

Bryan W. Shaw, Ph.D., P.E., *Chairman*  
Toby Baker, *Commissioner*  
Jon Niermann, *Commissioner*  
Richard A. Hyde, P.E., *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

April 22, 2016

Mr. Ron Curry  
Regional Administrator  
U.S. Environmental Protection Agency, Region 6  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Subject: List of Texas sites identified for sulfur dioxide air quality characterization

Dear Mr. Curry:

On January 15, 2016, the Texas Commission on Environmental Quality (TCEQ) submitted a list of sulfur dioxide (SO<sub>2</sub>) emissions sources in Texas identified for further evaluation and air quality characterization, as directed by the 2010 SO<sub>2</sub> National Ambient Air Quality Standard (NAAQS) "Data Requirements Rule" (DRR) of August 2015. The ExxonMobil Refining and Supply Company's Baytown Refinery in Harris County was included on this list due to its reported 2,204 tons of SO<sub>2</sub> emissions in 2014. Our letter also informed you that the company had submitted data to the TCEQ indicating 1,452 tons of SO<sub>2</sub> emissions in 2015. The TCEQ has completed the quality assurance review of the 2015 estimated emissions data provided and can confirm that 1,452 tons of SO<sub>2</sub> emissions for 2015 will be the facility's emissions inventory value. Because the Baytown Refinery's most recent SO<sub>2</sub> emissions fall below the 2,000 tons per year (tpy) emissions threshold set in that SO<sub>2</sub> DRR, the TCEQ requests removal of this facility from the list of sites identified per the DRR requirement.

ExxonMobil has also provided documentation of previous year's emissions data showing why it is reasonable to anticipate that future yearly SO<sub>2</sub> emissions for this facility will stay below the 2,000 tpy threshold. The information ExxonMobil provided indicates that the unusually high SO<sub>2</sub> emissions reported in 2013 and 2014 resulted from the process of returning TK-1026 Sour Water Tank (tank 1026) bottoms material to the process to recover hydrocarbons. However, the data from those two years does not accurately reflect typical historical, current, or projected future SO<sub>2</sub> emissions at the Baytown Refinery. ExxonMobil had reported between 1,100 and 1,700 tpy of SO<sub>2</sub> emissions from 1998 to 2012. The company also evaluated its five-year projection for tank cleaning activities, as well as its potential to clean any tanks with similar content

Ron Curry  
Page 2  
April 22, 2016

to tank 1026, and determined that there are no tanks currently scheduled for cleaning that contain tank 1026 or similar material that may contain sulfur levels that will significantly impact its SO<sub>2</sub> emissions. Further, ExxonMobil stated that they have no plans to resume processing tank bottoms materials, as its current use of improved tank cleaning techniques have minimized residual tank bottoms material. Based on current projections and information, ExxonMobil anticipates sustaining its 2015 level of SO<sub>2</sub> emissions in the coming years.

The TCEQ respectfully requests removal of the Baytown Refinery from the list of Texas facilities identified for further evaluation per the DRR with the understanding that the United States Environmental Protection Agency (EPA) could later add the company back to the list should its emissions exceed the 2,000 tpy threshold in the future. If you have questions, please contact me at 512-239-1725 ([David.Brymer@tceq.texas.gov](mailto:David.Brymer@tceq.texas.gov)), or Steve Hagle at 512-239-1295 ([Steve.Hagle@tceq.texas.gov](mailto:Steve.Hagle@tceq.texas.gov)).

Sincerely,

A handwritten signature in black ink, appearing to read "David Brymer", with a stylized flourish extending to the right.

David Brymer, Director  
Air Quality Division  
Texas Commission on Environmental Quality

cc: Steve Hagle, P.E., Deputy Director, TCEQ Office of Air  
Mark Hansen, EPA R6