



EPA Review of 6/30/10 TCEQ Response to Objection (RTO) on Ticona Polymers Inc., Co-gen & 2/10/12 Draft Title V Permit With PSD Emission Limit Table - Title V Permit No. O2013

Stephanie Kordzi to: Kim Strong

03/23/2012 03:28 PM

Cc: Jesse Chacon, Jeffrey Robinson, Joshua Olszewski

Bcc: Stephanie Kordzi

From: Stephanie Kordzi/R6/USEPA/US

To: "Kim Strong" <Kim.Strong@tceq.texas.gov>

Cc: Jesse Chacon <Jesse.Chacon@tceq.texas.gov>, Jeffrey Robinson/R6/USEPA/US, Joshua Olszewski/R6/USEPA/US@EPA

Bcc: Stephanie Kordzi/R6/USEPA/US@EPA

Hi Kim,

On November 20, 2009, the Environmental Protection Agency (EPA) objected to the proposed Title V permit for Ticona Polymers, Inc. Co-Gen. On June 30, 2010, we received the Texas Commission on Environmental Quality (TCEQ) Executive Director's Response to EPA's Objection (RTO), proposed permit, and associated Statement of Basis (SOB). TCEQ provided an updated draft Title V permit with an emission limit table on February 10, 2012. We have reviewed the RTO and the 2/10/12 Ticona draft permit with PSD Emission Limit Table, PSDTX725 for Title V Permit No. O2013.

We have two comments regarding the emission limit table listed below. These comments are consistent with our letter of 3/21/12, to TCEQ regarding the Title V pilot project (attached). We request these comments be addressed prior to Title V permit issuance. We believe Ticona should move forward with the permit process.



Ltr to TCEQ on IBR Pilot Project 3-21-12.pdf

Regarding Objection 1 (Objection to the incorporation by reference of PSD Permit PSDTX725):

- Add a column that includes the applicable Permit Number and its effective/modified date (as applicable to the listed emission limit) to the emission limit table for each emission point.
- Ensure Unit ID numbers are consistent.

The EPA has no further comments on Objections 2 (Objection to Incorporation of Permit No. 8442 into the Title V permit - Ticona submitted a response to the QF objection with lookback information); 3 (Objection to Recordkeeping Provision); or 4 (Objection to Special Condition 3).

Please note that EPA may review the issued permit if it receives a public petition pursuant to 40 CFR § 70.8(d). We are committed to working with the TCEQ to ensure that permits address all applicable requirements, including the Texas State Implementation Plan, and are consistent with the federally-approved Texas Title V air permitting program. If you have questions or wish to discuss this further, please contact Jeff Robinson, Chief, Air Permits Section at (214) 665-6435, or myself at (214) 665-7520. Thank you.

Stephanie Kordzi
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"Kim Strong"

Stephanie, The contact for Ticona Ploymers e-m...

03/19/2012 08:56:58 AM

From: "Kim Strong" <Kim.Strong@tceq.texas.gov>
To: Stephanie Kordzi/R6/USEPA/US@EPA
Date: 03/19/2012 08:56 AM
Subject: Fwd: RE: Re: Ticona Polymers Qualified Facility Review

Stephanie,

The contact for Ticona Ploymers e-mailed me last week while I was out wanting to know if we had heard anything from EPA. I just thought I would pass it along & see if you had an update.

Thanks,
Kim

>>> "Joyner, Edward (Buddy), Celanese/US" <Buddy.Joyner@celanese.com>
3/15/2012 9:58 AM >>>
Good morning Kim, have you gotten any word back from the EPA?

-----Original Message-----

From: Kim Strong [mailto:Kim.Strong@tceq.texas.gov]
Sent: Thursday, February 09, 2012 1:26 PM
To: Joyner, Edward (Buddy), Celanese/US
Subject: RE: Re: Ticona Polymers Qualified Facility Review

Here is the SOP with the table included. I am going to send this back to EPA. Do you have any other comments?