From: eric.quiat@powereng.com Sent: Monday, July 8, 2024 10:17 AM

To: Carolyn Maus

Cc: Tammy Lasater / FPC Environmental; LeAnn M. Usoff/FTEHSF;

azli.hassan@powereng.com

Subject: RE: Working Draft Permit -- FOP O4212/Project 35951, Formosa Plastics

Corporation, Texas/Formosa Point Comfort Plant

Attachments: TCEQ-OP-CRO1 Certification by Responsible Official-07.05.2024.pdf

Carolyn,

The final WDP looks good to us.

The signed OP-CRO1 form is attached. Please let us know if you need anything else from us in getting this processed.

Regards,

ERIC QUIAT, P.E. PROJECT MANAGER

512-579-3823 512-496-7655 cell

POWER Engineers, Inc.

www.powereng.com [linkprotect.cudasvc.com]



From: Carolyn Maus <carolyn.maus@tceq.texas.gov>

Sent: Friday, June 28, 2024 9:57 AM

To: Quiat, Eric <eric.quiat@powereng.com>

Cc: Tammy Lasater / FPC Environmental <tlasater@ftpc.fpcusa.com>; LeAnn M. Usoff/FTEHSF

<<u>LeAnnU@ftpc.fpcusa.com</u>>; Hassan, Azli <azli.hassan@powereng.com>

Subject: [EXTERNAL] RE: Working Draft Permit -- FOP O4212/Project 35951, Formosa Plastics

Corporation, Texas/Formosa Point Comfort Plant

CAUTION: This Email is from an EXTERNAL source. STOP. THINK before you CLICK links or OPEN attachments.

Hi Eric,

Thanks for your patience for me to get this back to you all. Please see the attached revised WDP. I have implemented the following comments:

1) Changed unit ID 3U-NH3TK to 3TTB-02A and updated unit name.

Form OP-CRO1 Certification by Responsible Official Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. Identifying Information							
RN: 100218973	CN: 600130017		Account	No.: CB0038	Q		
Permit No.: O4212		Project No.: 3:	5951				
Area Name: Utilities 3 Plant		Company Nan	ne: Formosa Plast	ics Corporatio	n, Texas		
II. Certification Type (Please mark t	the appropriate b	oox)					
Responsible Official		Duly Aut	horized Represen	tative			
III. Submittal Type (Please mark the	appropriate box)	(Only one resp	oonse can be acce	pted per form,)		
SOP/TOP Initial Permit Application	□ Update	e to Permit App	lication				
GOP Initial Permit Application	Permit	Revision, Ren	ewal, or Reopenir	ng			
Other:							
IV. Certification of Truth							
This certification does not extend to information which is designated by the TCEQ as information for reference only. I,							
Time Period: From11/0	06/2023	to	07/01/	2024			
	art Date		End	Date			
Specific Dates:	Date 2	Date 3	Date 4	Date 5	Date 6		
Signature: Mike Rivet	Digitally signed by Mike Rivet DN: cn=Mike Rivet, o=FPCTX, ou=C email=mikerivet@ftpc.fpcusa.com, Date: 2024.07.05 12:47:46 -05'00'	GMO, c=US	Signature Date:	07/05/2024			
Title: Assistant Vice President/Site Man	ager						

From: eric.quiat@powereng.com Sent: Friday, June 28, 2024 3:42 PM

To: Carolyn Maus

Cc: Tammy Lasater / FPC Environmental; LeAnn M. Usoff/FTEHSF;

azli.hassan@powereng.com

Subject: RE: Working Draft Permit -- FOP O4212/Project 35951, Formosa Plastics

Corporation, Texas/Formosa Point Comfort Plant

Thanks Carolyn. We will review and get back with you.

ERIC QUIAT, P.E. PROJECT MANAGER

512-579-3823 512-496-7655 cell

POWER Engineers, Inc.

www.powereng.com [linkprotect.cudasvc.com]



From: Carolyn Maus < carolyn.maus@tceq.texas.gov>

Sent: Friday, June 28, 2024 9:57 AM

To: Quiat, Eric < eric.quiat@powereng.com>

Cc: Tammy Lasater / FPC Environmental <<u>tlasater@ftpc.fpcusa.com</u>>; LeAnn M. Usoff/FTEHSF

<LeAnnU@ftpc.fpcusa.com>; Hassan, Azli <azli.hassan@powereng.com>

Subject: [EXTERNAL] RE: Working Draft Permit -- FOP O4212/Project 35951, Formosa Plastics

Corporation, Texas/Formosa Point Comfort Plant

CAUTION: This Email is from an EXTERNAL source. STOP. THINK before you CLICK links or OPEN attachments.

Hi Eric,

Thanks for your patience for me to get this back to you all. Please see the attached revised WDP. I have implemented the following comments:

- 1) Changed unit ID 3U-NH3TK to 3TTB-02A and updated unit name.
- Switched the two unit names for 3U-TTW13A and 3U-TTW13B.

The one requested change that I did not make is to add language to the basis of determination for the Chapter 115 permit shield for 3TTB-02A. There are several reasons. First, changes to permit shields cannot be made during a minor revision. Second, the existing wording fully establishes that the tank is exempt so additional details are unnecessary. Third, if we were to include additional details, they would need to demonstrate some additional way that the tank is exempt. The point that the tank operates above atmospheric pressure and is not an atmospheric tank does not

correspond to an additional facet of negative applicability. If the tank was in a covered county storing VOC, say for example subject to 115.112(e)(1), the tank would either have to be controlled according to the table in that citation or maintain working pressure, and we would have included the working pressure stipulation as a requirement in the Special Terms and Conditions. It would not be eligible for a shield on that basis. As a result of these reasons, the basis of determination will remain the same.

I will begin preparing the file for public announcement. The only remaining item I need is certification for the WDP comments. Please do one of the following options by **Monday, July 8, 2024**:

- 1) Send me an OP-CRO1. You can use the Time Period or Specific Date option on the form as long as the date of 05/07/2024 is covered. You may email me a scan, but please follow up with the wet ink original in the mail afterwards.
- 2) Submit the WDP comments in STEERS (you can upload the 05/07/2024 email and WDP with your tracked changes/comments as attachments). It will be certified via the submittal process by having the RO or DAR sign and submit.

If you have any questions, please let me know.

Sincerely,

Carolyn Maus, P.E.
Air Permits Division
Texas Commission on Environmental Quality
P.O. Box 13087, MC 163
Austin, TX 78711
Phone: (E13) 230, 6304

Phone: (512) 239-6204 Fax: (512) 239-1400

How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey [links.govdelivery.com]

From: eric.quiat@powereng.com Sent: Tuesday, May 7, 2024 4:17 PM

To: Carolyn Maus

Cc: Tammy Lasater / FPC Environmental; LeAnn M. Usoff/FTEHSF;

azli.hassan@powereng.com

Subject: RE: Working Draft Permit -- FOP O4212/Project 35951, Formosa Plastics

Corporation, Texas/Formosa Point Comfort Plant

Attachments: WDP 04212 - comments for TCEQ.docx

Carolyn,

Please find comments on the WDP attached.

Thank you,

ERIC QUIAT, P.E. PROJECT MANAGER

512-579-3823 512-496-7655 cell

POWER Engineers, Inc.

www.powereng.com [linkprotect.cudasvc.com]





From: Carolyn Maus <carolyn.maus@tceq.texas.gov>

Sent: Tuesday, April 30, 2024 10:18 AM To: Quiat, Eric <eric.quiat@powereng.com>

Cc: Tammy Lasater / FPC Environmental <tlasater@ftpc.fpcusa.com>; LeAnn M. Usoff/FTEHSF

<LeAnnU@ftpc.fpcusa.com>; Hassan, Azli <azli.hassan@powereng.com>

Subject: [EXTERNAL] RE: Working Draft Permit -- FOP O4212/Project 35951, Formosa Plastics

Corporation, Texas/Formosa Point Comfort Plant

FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO Formosa Plastics Corporation, Texas

AUTHORIZING THE OPERATION OF Formosa Point Comfort Complex Utilities 3 (UT3) Plant Petrochemical Manufacturing

LOCATED AT

Jackson County, Texas Latitude 28° 41′ 20″ Longitude 96° 32′ 50″ Regulated Entity Number: RN100218973

This permit is issued in accordance with and subject to the Texas Clean Air Act (TCAA), Chapter 382 of the Texas Health and Safety Code and Title 30 Texas Administrative Code Chapter 122 (30 TAC Chapter 122), Federal Operating Permits. Under 30 TAC Chapter 122, this permit constitutes the permit holder's authority to operate the site and emission units listed in this permit. Operations of the site and emission units listed in this permit are subject to all additional rules or amended rules and orders of the Commission pursuant to the TCAA.

This permit does not relieve the permit holder from the responsibility of obtaining New Source Review authorization for new, modified, or existing facilities in accordance with 30 TAC Chapter 116, Control of Air Pollution by Permits for New Construction or Modification.

The site and emission units authorized by this permit shall be operated in accordance with 30 TAC Chapter 122, the general terms and conditions, special terms and conditions, and attachments contained herein.

This permit shall expire five years from the date of issuance. The renewal requirements specified in 30 TAC § 122.241 must be satisfied in order to renew the authorization to operate the site and emission units

Permit No:	04212	issuance Date: _	August 19, 2021	
			_	
For the	Commission			

Permit Shield

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit / Group / Process ID No.	Group / Inclusive Units	Regulation	Basis of Determination
3TTB-02A3U-NH3TK	N/A	30 TAC Chapter 115, Storage of VOCs	Unit is a storage vessel and operates above atmospheric pressure and is not an atmospheric storage tank. Further, it is not located in a covered county and unit does not store VOC's.
3U-TTB-04	N/A	30 TAC Chapter 115, Storage of VOCs	Unit is not located in a covered county and unit does not store VOC's.
3U-TTB-05	N/A	30 TAC Chapter 115, Storage of VOCs	Unit is not located in a covered county and unit does not store VOC's.
3U-TTB-06	N/A	30 TAC Chapter 115, Storage of VOCs	Unit is not located in a covered county and unit does not store VOC's.
3U-TTW13A	N/A	30 TAC Chapter 115, Storage of VOCs	Unit is not located in a covered county and unit does not store VOC's.
3U-TTW13B	N/A	30 TAC Chapter 115, Storage of VOCs	Unit is not located in a covered county and unit does not store VOC's.
3U-TTW12	N/A	30 TAC Chapter 115, Storage of VOCs	Unit is not located in a covered county and unit does not store VOC's.
UT3-GRPLOVT	3U-7ALOVT, 3U-7BLOVT, 3U- STLOVT	30 TAC Chapter 115, Vent Gas Controls	Unit is not located in a covered county.
UT3-GRPNGVT	3U-7ANGVT, 3U-7BNGVT	30 TAC Chapter 115, Vent Gas Controls	Unit is not located in a covered county.

Commented [QE1]: TCEQ - please update the unit ID for this row.

Commented [QE2]: TCEQ - we would like to add this language to the basis of determination for this entry.

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New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
3U-7A	UT3 NO. 1 GAS TURBINE	140763, GHGPSDTX46, PSDTX1500
3U-7ALOVT	UT3 NO. 1 GAS TURBINE LUBE OIL VENT	140763, GHGPSDTX46, PSDTX1500
3U-7ANGVT	UT3 NO. 1 GAS TURBINE NATURAL GAS VENT	140763, GHGPSDTX46, PSDTX1500
3U-7B	UT3 NO. 2 GAS TURBINE	140763, GHGPSDTX46, PSDTX1500
3U-7BLOVT	UT3 NO. 2 GAS TURBINE LUBE OIL VENT	140763, GHGPSDTX46, PSDTX1500
3U-7BNGVT	UT3 NO. 2 GAS TURBINE NATURAL GAS VENT	140763, GHGPSDTX46, PSDTX1500
3TTB-02A 3U-NH3TK	UT3 AQUEOUS AMMONIA TANK STORAGE VESSEL	140763, GHGPSDTX46, PSDTX1500
3U-STLOVT	UT3 STEAM TURBINE LUBE OIL VENT	140763, GHGPSDTX46, PSDTX1500
3U-TTB-04	UT3 AMINE TANK	106.472/09/04/2000
3U-TTB-05	UT3 DEHA TANK	106.472/09/04/2000
3U-TTB-06	UT3 PHOSPHATE TANK	106.472/09/04/2000
3U-TTW13A	UT3 DISPERSANT TANK UT3 CORROSION INHIBITOR TANK	106.472/09/04/2000
3U-TTW13B	UT3 DISPERSANT TANK UT3 CORROSION INHIBITOR TANK	106.472/09/04/2000
3U-TTW12	UT3 SULFURIC ACID TANK	140763, GHGPSDTX46, PSDTX1500

^{**}This column may include Permit by Rule (PBR) numbers and version dates, PBR Registration numbers in brackets, Standard Permit Registration numbers, Minor NSR permit numbers, and Major NSR permit numbers.

Commented [QE3]: TCEQ - please update the Unit ID and description for this item.

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Commented [QE4]: TCEQ, the names for these two tanks need to be switched.

From: Carolyn Maus

Sent: Tuesday, April 30, 2024 11:18 AM

To: eric.quiat@powereng.com

Cc: Tammy Lasater / FPC Environmental; LeAnn M. Usoff/FTEHSF;

azli.hassan@powereng.com

Subject: RE: Working Draft Permit -- FOP O4212/Project 35951, Formosa Plastics

Corporation, Texas/Formosa Point Comfort Plant

Hi Eric,

Yes, that would be fine. I will make a note to look for your response on 5/8.

Sincerely,

Carolyn Maus, P.E.
Air Permits Division
Texas Commission on Environmental Quality
P.O. Box 13087, MC 163
Austin, TX 78711
Phone: (513) 230, 6304

Phone: (512) 239-6204 Fax: (512) 239-1300



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at www.tceq.texas.gov/customersurvey

From: eric.quiat@powereng.com <eric.quiat@powereng.com>

Sent: Tuesday, April 30, 2024 10:44 AM

To: Carolyn Maus < carolyn.maus@tceq.texas.gov>

Cc: Tammy Lasater / FPC Environmental <<u>tlasater@ftpc.fpcusa.com</u>>; LeAnn M. Usoff/FTEHSF

<LeAnnU@ftpc.fpcusa.com>; azli.hassan@powereng.com

Subject: RE: Working Draft Permit -- FOP O4212/Project 35951, Formosa Plastics Corporation,

Texas/Formosa Point Comfort Plant

Carolyn,

Good morning. We are currently reviewing the WDP you provided in the email below. May we have a few additional days to respond to you on the WDP with any comments? We anticipate that we can supply comments to you by next Wednesday 5/8. Thank you and please let us know if this will work for you.

Regards,

ERIC QUIAT, P.E. PROJECT MANAGER

512-579-3823 512-496-7655 cell

POWER Engineers, Inc.

www.powereng.com [linkprotect.cudasvc.com]





From: Carolyn Maus <carolyn.maus@tceq.texas.gov>

Sent: Friday, April 19, 2024 12:41 PM

To: LeAnn M. Usoff/FTEHSF < LeAnnU@ftpc.fpcusa.com>

Subject: Working Draft Permit -- FOP 04212/Project 35951, Formosa Plastics Corporation,

Texas/Formosa Point Comfort Plant

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- IT/Management Cente

Good afternoon,

I have conducted a technical review of the minor revision application for Formosa Plastics Corporation, Texas, Formosa Point Comfort Plant, Utilities 3 (UT3) Plant. An electronic copy of the Working Draft Permit (WDP) is attached for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided. Changes made are as follows:

- Updated issuance dates for GHGPSDTX46, PSDTX1500, and 140763 to 06/22/2023. (Please note that since 140763 and PSDTX1500 are in the same document, the same issuance date will always be listed for both in the Title V permit, even if a particular NSR action did not involve a PSD modification. That is just our standard format for referencing.)
- 2) Updated Major NSR Summary Tables based on the revised versions from the application. The only further change I made is for the row for 3U-TTW12 in the 140763/PSDTX1500 table. For NSR permit conditions, we do not reference subparagraphs but just use the term number, so you will see 14 listed instead of 14.C. (The GHG permit is an exception since that was originally not issued by TCEQ so all the condition numbering is a different format, and we maintain that.)

Please review the WDP and submit to me any comments you have on the working draft permit by <u>May 3, 2024</u>. Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

Please review the second portion of the "SOP Technical Review Fact Sheet" located at http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title V/sop wdp factsheet. pdf [linkprotect.cudasvc.com]. This guidance contains important information regarding WDP review and comment procedures.

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified application information, including application updates supporting the WDP comments, is required. After final review of the WDP, additional changes supported by application updates may require certification. I will advise you of these changes at a later date. Prior to transmittal of the Public Notice/Announcement Authorization Package, a duly signed OP-CRO1 form may be required which includes the specific dates or time-period of all submitted application documentation that was not previously certified. I will advise you of this requirement prior to sending the Public Notice/Announcement Authorization.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1.

Please notify me when these updates have been submitted.

As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at R6AirPermitsTX@epa.gov and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at Where to Submit FOP Applications and Permit-Related Documents [linkprotect.cudasvc.com].

Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

Carolyn Maus, P.E.
Air Permits Division
Texas Commission on Environmental Quality
P.O. Box 13087, MC 163
Austin, TX 78711
Phone: (512) 239-6204

Phone: (512) 239-6204 Fax: (512) 239-1400

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From: Carolyn Maus <carolyn.maus@tceq.texas.gov>

Sent: Thursday, December 21, 2023 8:35 PM

To: LeAnn M. Usoff/FTEHSF

Subject: Technical Review -- FOP O4212/Project 35951, Formosa Plastics Corporation,

Texas/Utilities 3 (UT3) Plant

Good evening,

I have been assigned to the Federal Operating Permit (FOP) minor revision application of Permit No. O4212 for Formosa Plastics Corporation, Texas, Utilities 3 (UT3) Plant. This application has been assigned Project No. 35951. Please address all correspondence pertaining to this permit application, including any updates, to me at the address in my email signature, and use both the Permit and Project reference numbers above to facilitate tracking. I will be conducting a technical review of the application and will request any updates or corrections from you if needed.

In addition, I wanted to let you know that EPA has, on occasion, objected to Title V permits based on the following:

- a. NSR permit and PBR monitoring sufficiency –please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient.
- b. Reference to confidential business information (CBI) in NSR permits and PBR submittals.
- c. High level terms in the SOP Applicable Requirement Summary Table. The high level terms are sometimes used in SOPs when unit attribute forms have not yet been updated due to regulatory amendments.
- d. Accuracy of PBR information provided on the supplemental table and in the permit please refer to Forms OP-PBRSUP and OP-REQ1 Instructions.

If you have any questions or concerns on any of these items or think you need to do any additional updates, let me know and we can discuss further.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1. This form will be requested at a later date.

If you choose to submit your application updates through STEERS, please notify me when these updates have been submitted.

Please review the "SOP Technical Review Fact Sheet" located at http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title V/sop wdp_factsheet.pdf. This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

Carolyn Maus, P.E.
Air Permits Division
Texas Commission on Environmental Quality
P.O. Box 13087, MC 163
Austin, TX 78711

Phone: (512) 239-6204 Fax: (512) 239-1400

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Texas Commission on Environmental Quality

Title V Existing 4212

Site Information (Regulated Entity)

What is the name of the permit area to be UTILITIES 3 (UT3) PLANT

authorized?

 County
 JACKSON

 Latitude (N) (##.#####)
 28.688888

 Longitude (W) (-###.#####)
 96.547222

 Primary SIC Code
 2821

Secondary SIC Code

Primary NAICS Code 325110

Secondary NAICS Code

Regulated Entity Site Information

What is the Regulated Entity's Number (RN)? RN100218973

What is the name of the Regulated Entity (RE)? FORMOSA POINT COMFORT PLANT

Does the RE site have a physical address?

Yes

Physical Address

Number and Street 201 FORMOSA DR
City POINT COMFORT

 State
 TX

 ZIP
 77978

 County
 CALHOUN

 Latitude (N) (##.######)
 28.6888

 Longitude (W) (-###.######)
 -96.5472

Facility NAICS Code

What is the primary business of this entity? INDUSTRIAL CHEMICAL MANUFACTURING

PLANT

Customer (Applicant) Information

How is this applicant associated with this site?

What is the applicant's Customer Number

CN600130017

(CN)?

Type of Customer Corporation

Full legal name of the applicant:

Legal Name Formosa Plastics Corporation, Texas

Texas SOS Filing Number5107506Federal Tax ID222355464State Franchise Tax ID12223554648

State Sales Tax ID

Local Tax ID

DUNS Number 106238165

Number of Employees 501+

Independently Owned and Operated? Yes

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name FORMOSA PLASTICS CORPORATION

TEXAS

Prefix MR First KEN

Middle

Last MOUNGER

Suffix

Credentials

Title EXECUTIVE VICE PRESIDENT

Enter new address or copy one from list:

Mailing Address

Address Type Domestic

Mailing Address (include Suite or Bldg. here, if 9 PEACH TREE HILL RD

applicable)

Routing (such as Mail Code, Dept., or Attn:)

City LIVINGSTON

State NJ ZIP 07039

Phone (###-###) 9737167205

Extension

Alternate Phone (###-###-)

Fax (###-###) 9739948005

E-mail TammyL@fdde.fpcusa.com

Duly Authorized Representative Contact

Person TCEQ should contact for questions

about this application

Select existing DAR contact or enter a new MIKE RIVET(FORMOSA PLASTIC...)

contact.

Organization Name FORMOSA PLASTICS CORPORATION

TEXAS

Prefix MR
First MIKE

Middle

Last RIVET

Suffix Credentials

Title EXECUTIVE DIRECTOR SITE MANAGER

Enter new address or copy one from list

Mailing Address

Address Type Domestic

Mailing Address (include Suite or Bldg. here, if PO BOX 700

applicable)

Routing (such as Mail Code, Dept., or Attn:)

City POINT COMFORT

State TX
Zip 77978

Phone (###-###-###)

Extension

Alternate Phone (###-###-)

Fax (###-###-###)

E-mail

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

Organization Name

Prefix
First

Middle

Last Usoff

Suffix Credentials

Title Assistant Manager of Air Permitting

Enter new address or copy one from list: Duly Authorized Representative Contact

Address

Domestic

SOP

No

28 Deg 41 Min 20 Sec

PO BOX 700

3619877000

New Contact

MS

LeAnn

mikerivet@ftpc.fpcusa.com

Formosa Plastics Corporation Texas

Mailing Address

Address Type
Mailing Address (include Suite or Bldg. here, if

applicable)

Routing (such as Mail Code, Dept., or Attn:)

City

POINT COMFORT

State TX ZIP 77978

Phone (###-###) 3619209401

Extension

Alternate Phone (###-###-###)

Fax (###-###-###)

E-mail leannu@ftpc.fpcusa.com

Title V General Information - Existing

1) Permit Type:

2) Permit Latitude Coordinate:

3) Permit Longitude Coordinate: 96 Deg 32 Min 50 Sec

4) Is this submittal a new application or an New Application update to an existing application?

4.1. What type of permitting action are you Streamlined Revision

applying for?

4.1.1. Are there any permits that should be

voided upon issuance of this permit application through permit conversion?

4.1.2. Are there any permits that should be voided upon issuance of this permit application

through permit consolidation?

5) Who will electronically sign this Title V Duly Authorized Representative application?

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

Attach OP-2 (Application for Permit Revision/Renewal)

[File Properties]

File Name

OP_2_Final UT3 Title V Minor Rev App 11-6-23.pdf=/a>

Hash

A56095D958B74A9A6C3A046BC88202CEB28885C32E46640ECD323CFD67FE42CF

MIME-Type

application/pdf

Attach OP-REQ1 (Application Area-Wide Applicability Determinations and General Information)

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

If applicable, attach OP-AR1 (Acid Rain Permit Application)

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach any other necessary information needed to complete the permit.

An additional space to attach any other necessary information needed to complete the permit.

Expedite Title V

1) Per Texas Health and Safety Code, Section 382.05155, does the applicant want to expedite the processing of this application?

No

Certification

I certify that I am the Duly Authorized Representative for this application and that, based on information and belief formed after reasonable inquiry, the statements and information on this form are true, accurate, and complete.

- 1. I am Mike Rivet, the owner of the STEERS account ER093335.
- 2. I have the authority to sign this data on behalf of the applicant named above.
- 3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
- 4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
- 5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
- 6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcemer of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
- 7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
- 8. I am knowingly and intentionally signing Title V Existing 4212.
- 9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEC

OWNER OPERATOR Signature: Mike Rivet OWNER OPERATOR

Account Number: ER093335
Signature IP Address: 172.108.196.196
Signature Date: 2023-11-07

 Signature Hash:
 9F4614222A5B6368E68AE9C9B5DD5994435A2EC6A7D72565FCA14D101EB6C11C

 Form Hash Code at time of Signature:
 096962B184B248CFE99A9C1A722EFB636FDB3BAA2E580D43DAC4DB359FF3AC08

Submission

Reference Number: The application reference number is 603130

Submitted by: The application was submitted by

ER093335/Mike Rivet

Submitted Timestamp: The application was submitted on 2023-11-07

at 15:38:02 CST

Submitted From: The application was submitted from IP address

172.108.196.196

Confirmation Number: The confirmation number is 499217

Steers Version:The STEERS version is 6.70Permit Number:The permit number is 4212

Additional Information

Application Creator: This account was created by Eric Quiat



Formosa Plastics Corporation, Texas

201 Formosa Drive • P.O. Box 700 Point Comfort, TX 77978 Telephone: (361) 987-7000

November 6, 2023

Electronic Delivery via STEERS

Texas Commission on Environmental Quality Air Permits Initial Review Team (APIRT) (MC-161) P. O. Box 13087 Austin, Texas 78711-3087

RE: Formosa Plastics Corporation, Texas

Utilities 3 (UT3) Plant Title V SOP Minor Revision Application

TCEQ Air Quality Project Number: TBA TCEQ Title V Permit Number: 04212

Customer Reference Number: CN600130017 Regulated Entity Number: RN100218973 TCEQ Air Quality Account Number CB0038Q

To Whom It May Concern:

Formosa Plastics Corporation, Texas (FPC TX) is submitting the enclosed Title V Site Operating Permit (SOP) minor revision application for the Utilities 3 (UT3) Plant located in Point Comfort, Calhoun and Jackson Counties, Texas. The enclosed permit application incorporates the UT3 Plant's NSR permit no. 140763 and GHGPSDTX46 amendments issued on June 22, 2023.

The enclosed application includes the following forms: OP-CRO1, OP-2, OP-REQ1 (page 87), and Major NSR Summary Tables.

Should you have any questions, please contact Ms. LeAnn Usoff at leannu@ftpc.fpcusa.com or by telephone at (361) 920-9401.

Sincerely.

Mike Rivet

Executive Director/Site Manager Formosa Plastics Corporation, Texas

Enclosure

CC: Electronic Delivery via STEERS
Air Program Manager, Region 14
Texas Commission on Environmental Quality
NRC Building, Ste. 1200
6300 Ocean Drive, Unit 5839
Corpus Christi, Texas 78412-5839
(Copy of the Application)

Electronic Delivery: R6AirPermitsTX@epa.gov

EPA Region 6

OP-CR01

Form OP-CRO1 Certification by Responsible Official Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I.	Identifying Information							
RN: 1	100218973	CN: 600130017			Account No.: CB00380	Q		
Permi	it No.: 04212		Project No.:	TBA				
Area	Name: Utilities 3 Plant		Company Na	ame: Form	nosa Plastics Corporatio	on, Texas		
II.	Certification Type (Please mark	the appropriate l	oox)					
☐ Re	☐ Responsible Official ☐ Duly Authorized Representative							
III.	Submittal Type (Please mark the	e appropriate box) (Only one re	esponse ca	n be accepted perform,			
	OP/TOP Initial Permit Application	☐ Updat	e to Permit A	pplication				
☐ GOP Initial Permit Application ☐ Permit Revision, Renewal, or Reopening								
☐ O1	Other:							
IV.	Certification of Truth							
This only.	certification does not extend to in			-		for reference		
I, Mik	ke Rivet		certif	fy that I an	n the DAR			
	(Certifier Name printed or	r typed)			(RO or DA	1 <i>R</i>)		
	nat, based on information and believe me period or on the specific date(s)			•	tements and information	dated during		
	Enter Either a Time Period OR Sication is not valid without docume		r each certifi	cation. Thi	is section must be comp	leted. The		
Time	Period: From	art Date	to					
	St	art Date			End Date			
Specif	fic Dates: 11/03/2023							
	Date 1	Date 2	Date 3	Date 4	Date 5	Date 6		
Signat	ture: _(signed in STEERS)			Signatu	re Date:			
Title:	Executive Director/Site Manager							

Federal Operating Permit Program Application for Permit Revision/Renewal Form OP-2-Table 1 Texas Commission on Environmental Quality

Date: 11/03/2023	
Permit No.: O4212	
Regulated Entity No.: RN100218973	
Company Name: Formosa Plastics Corporation, Texas	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA?	X YES NO
I. Application Type	
Indicate the type of application:	
Renewal	
☒ Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
Significant Revision	
Revision Requesting Prior Approval	
Administrative Revision	
Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only	X YES NO
For GOP Revisions Only	YES NO

Federal Operating Permit Program Application for Permit Revision/Renewal Form OP-2-Table 1 (continued) Texas Commission on Environmental Quality

III.	Major Source Pollutants (Com	plete this section if the	permit revision is due to	o a change at the site o	r change in regulations.))
	e all pollutants for which the site the appropriate box[es].)	is a major source based of	on the site's potential to en	mit:		
X VO	C \boxtimes NO_X	\boxtimes SO ₂	\triangleright PM ₁₀	⊠ CO	Pb	⋈ HAP
Other:	GHGs					
IV.	Reference Only Requirements	(For reference only)				
Has th	e applicant paid emissions fees	for the most recent ag	gency fiscal year (Septer	mber 1 - August 31)?	X	YES NO N/A
V.	Delinquent Fees and Penalties					
	: This form will not be proces TCEQ are paid in accordance v	1		wed to the TCEQ or t	he Office of the Attorne	ey General on behalf

OP-REQ1

Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 Federal Operating Permit Program

Date:	11/03/2023
Permit No.:	O4212
RN No.:	RN100218973

For SOP applications, answer ALL questions unless otherwise directed.

For GOP applications, answer ONLY these questions unless otherwise directed.

Form OP-REQ1: Page 87						
XII. NSR Authorizations (Attach a	dditional sheets if ne	cessary	for sections E-J)		
E. PSD Permits an	d PSD N	Aajor Pollutants				
PSD Permit No.: PSDTX1500 Issuance Date: 04/17/2017 Pollutant(s): VOC, CO, NOx, PM, PM ₁₀ , PM _{2.5}						
PSD Permit No.: GHGPSDTX	46	Issuance Date: 06/22/2	2023	Pollutant(s): CO2e (G	HGs)	
PSD Permit No.:		Issuance Date:		Pollutant(s):		
PSD Permit No.:		Issuance Date:		Pollutant(s):		
If PSD Permits are held for th Technical Forms heading at:						
F. Nonattainment	(NA) Pe	rmits and NA Major	Pollutar	nts		
NA Permit No.:		Issuance Date:		Pollutant(s):		
NA Permit No.:		Issuance Date:		Pollutant(s):		
NA Permit No.:		Issuance Date:		Pollutant(s):		
NA Permit No.:		Issuance Date:		Pollutant(s):		
If NA Permits are held for the Technical Forms heading at:						
G. NSR Authorizat	ions wit	h FCAA § 112(g) Red	quireme	nts		
NSR Permit No.: 140763	Issuanc	e Date: 06/22/2023	NSR Pe	ermit No.:	Issuance Date:	
NSR Permit No.:	Issuanc	e Date:	NSR Pe	ermit No.:	Issuance Date:	
NSR Permit No.:	Issuanc	e Date:	NSR Pe	ermit No.:	Issuance Date:	
NSR Permit No.:	Issuanc	e Date:	NSR Pe	ermit No.:	Issuance Date:	
		16 Permits, Special P Rule, PSD Permits,				
Authorization No.:	Issuanc	e Date:	Authori	zation No.:	Issuance Date:	
Authorization No.:	Issuanc	e Date:	Authori	zation No.:	Issuance Date:	
Authorization No.:	Issuanc	e Date:	Authori	zation No.:	Issuance Date:	
Authorization No.:	Issuanc	e Date:	Authori	zation No.:	Issuance Date:	

MAJOR NSR SUMMARY TABLES

Major NSR Summary Table

Permits Numbers: G	HGPSDTX46				Issuance Date: 06/22/2023		
Emission Point No.	Source Name	GHG Mas	s Basis	TPY CO2e ³	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
		Air Contaminant Name	TPY ^{2,4}	111 CO26	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.
3U-7A	Combined-cycle CT No. 1/HRSG	N ₂ O	1		III.A.2, 3, 5, 6, 9, 10, 12,	III.A.2, 3, 5, 6, 10, 12, 13,	III.B.3, III.E.3,
		CH4	10	549,150	III.B.1, 3, 4, 5, III.E.1, 2, 3, IV.1, 7, V.A, B, C, D, E, F,	14, 15, III.E.1, 3, IV.1, 3,	IV.5, V.B, V.C,
		CO_2	548,583		G, H, I	4, 5, 8, V.A, B, C, D, F	V.D
3U-7ANGVT	Turbine No. 1 Startup Natural Gas	CH4	<1	13	III.D, IV.1, 3, 7	IV.1, 3, 4, 5, 8	IV.5
	Purges	CO ₂	<1	13	111.15, 14.11, 3, 7	17.1, 3, 4, 3, 0	
3U-7B	Combined-cycle CT No. 2/HRSG	N ₂ O	1		III.A.2, 3, 5, 6, 9, 10, 12, III.B.1, 3, 4, 5, III.E.1, 2, 3,	III.A.2, 3, 5, 6, 10, 12, 13,	III.B.3, III.E.3,
		CH4	10	549,150	IV.1, 7, V.A, B, C, D, E, F,	14, 15, III.E.1, 3, IV.1, 3,	
		CO_2	548,583		G, H, I	4, 5, 8, V.A, B, C, D, F	
3U-7BNGVT	Turbine No. 2 Startup Natural Gas	CH4	<1	13	III.D, IV.1, 3, 7	IV.1, 3, 4, 5, 8	IV.5
	Purges	CO_2	<1		III.D, 1V.1, 3, 7	17.1, 3, 1, 3, 0	14.5
OL3-FLRA	Flare Waste Gas Combustion	N_2O	<1	<1	IV.1, 7	IV.1, 3, 4, 5, 8	IV.5
OL3-FLRB		CH4	<1				
		CO_2	<1				
3U-NGFUG	Natural Gas Fugitives ⁵	CH4	<1	80	III.C.1, IV.1, 2, 7	III.C.2, IV.2, 3, 4, 5, 8	IV.5
		CO_2	3	80	III.C.1, 1V.1, 2, 7	III.C.2, 1V.2, 3, 4, 3, 8	14.5
3U-MSS	Natural gas purges during small equipment and fugitive	CH ₄	<1	7	IV.1, 7	IV.1, 3, 4, 5, 8	IV.5
	component repair, replacement, and maintenance ⁵	CO_2	<1		, ,		-
		N ₂ O	2	1,098,412			
	Totals ⁶	CH ₄	24				
		CO_2	1,097,194				

- 1. Compliance with the annual emission limits (tons per year) is based on a 12-month rolling total.
- 2. The tpy GHG Mass Basis values are for informational purposes only and do not constitute an emission limit.
- 3. The tpy emission limits specified in this table are not to be exceeded for this facility and include emissions from the facility during all operations and include MSS activities.
- 4. Global Warming Potentials (GWP): $CH_4 = 25$, $N_2O = 298$,
- 5. Fugitive process emissions totals are for informational purposes only and do not constitute an emission limit. The emission limit will be a design/work practice as specified in the permit.
- 6. The total emissions include the PTE for fugitive emissions. Totals are given for informational purposes only and do not constitute emission limits.

Major NSR Summary Table

Permits Numbers: 140763 and PSDTX1500					Issuance Date: 06/22/20	023	
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission	Rates	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.
3U-7A	UT3 No. 1 Gas	NO _x	9.69	50.74			
	Turbine	NO _x (MSS)	177.18	30.74			
		CO	11.79	78.16			
		CO (MSS)	434.17	/8.10			
		VOC	3.37	15.82			
		VOC (MSS)	37.22	13.82			
		SO ₂	0.93	3.67	2, 5, 6, 7, 11, 16, 17,	2, 6, 10, 16, 17 18, 20, 23, 24	2, 16, 17
		PM	4.03	17.38	19, 21		
		PM ₁₀	4.03	17.38			
		PM _{2.5}	4.03	17.38			
		NH ₃	17.93	72.09			
		NH ₃ (MSS)	50.00	73.08			
		H ₂ SO ₄	0.43	1.68			
		(NH ₄) ₂ SO ₄	0.58	2.27			
3U-7ALOVT	UT3 No. 1 Gas	VOC	0.01	0.04			
	Turbine Lube Oil Vent (5)	PM	0.01	0.04		23	
		PM_{10}	0.01	0.04			
		PM _{2.5}	0.01	0.04			
3U-7ANGVT	UT3 No. 1 Gas Turbine Natural Gas Vent (5)	VOC	0.66	0.02		23	
3U-CL2FUG	UT3 Chlorine Fugitives (5)	Cl ₂	0.01	0.02		23	
3U-7B	UT3 No. 2 Gas	NO _x	9.69	50.74		2, 6, 10, 16, 17, 18, 20, 23, 24	
	Turbine	NO _x (MSS)	177.18		2, 5, 6, 7, 11, 16, 17, 19, 21		2, 16, 17
		СО	11.79	78.16	19, 21		

TCEQ-20648 (APD-ID164v1.0, Revised 09/22) Major NSR Summary Table This form is for use by facilities subject to air quality permit requirements and may be revised periodically.

Permits Numbers: 140763	Issuance Date: 06/22/20	Issuance Date: 06/22/2023					
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission	Rates	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.
		CO (MSS)	434.17				
		VOC	3.37	15.82			
		VOC (MSS)	37.22	13.82			
		SO ₂	0.93	3.67			
		PM	4.03	17.38			
		PM ₁₀	4.03	17.38			
		PM _{2.5}	4.03	17.38			
		NH ₃	17.93	73.08			
		NH ₃ (MSS)	50.00	73.08			
		H ₂ SO ₄	0.43	1.68			
		(NH4)2SO4	0.58	2.27			
3U-7BLOVT	UT3 No. 2 Gas	VOC	0.01	0.04			
	Turbine Lube Oil Vent (5)	PM	0.01	0.04		23	
		PM ₁₀	0.01	0.04		23	
		PM _{2.5}	0.01	0.04			
3U-7BNGVT	UT3 No. 2 Gas Turbine Natural Gas Vent (5)	VOC	0.66	0.02		23	
3U-STLOVT	UT3 Steam Turbine	VOC	0.01	0.04			
	Lube Oil Vent (5)	PM	0.01	0.04		23	
		PM ₁₀	0.01	0.04			
		PM _{2.5}	0.01	0.04			
OL3-FLRA, OL3-FLRB	UT3 Contribution to	NO _x	2.00	0.01			
	the Olefins 3 Elevated Flare	СО	7.98	0.01		23	
		VOC	15.02	0.01			
3U-NGFUG	UT3 Natural Gas Fugitives (5)	VOC	0.12	0.51		23	

Permits Numbers: 140763 and PSDTX1500					Issuance Date: 06/22/2023		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission	Rates	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.
3U-NH3FUG	UT3 Aqueous Ammonia Fugitives (5)	NH ₃	0.02	0.08	13	23, 24	
3U-MSS	UT3 ILE Maintenance Fugitives (5)	NO _x	0.01	0.01	10	10, 23, 24	
		СО	0.01	0.01			
		VOC	1.00	0.01			
		VOC	27.83	0.14			
		PM	27.83	0.14			
		PM ₁₀	27.83	0.14			
		PM _{2.5}	47.96	0.05			
3U-W10	UT3 Cooling Tower	PM	0.86	2.40	22	22, 23	
		PM ₁₀	0.20	0.87			
		PM _{2.5}	0.01	0.01			
		HOCl	0.01	0.01			
3U-TTW12	UT3 Sulfuric Acid Tank	H ₂ SO ₄	0.01	0.01	14.C	14.C, 23	

- (1) Emission point identification either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3) VOC volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1

HOCl - hypochlorous acid

H₂SO₄ - sulfuric acid

NO_x - total oxides of nitrogen

SO₂ - sulfur dioxide

PM - total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented

PM_{2.5} - particulate matter equal to or less than 2.5 microns in diameter

CO - carbon monoxide

NH₃ - ammonia

 $(NH_4)_2SO_4$ - ammonium Sulfate Cl_2 - chlorine gas

- (4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.
- (5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.