Texas Commission on Environmental Quality

Title V Existing

4166

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	PE3 PLANT
Does the site have a physical address?	No
Because there is no physical address, describe how to locate this site:	201 Formosa Drive
City	Point Comfort
State	TX
ZIP	77978
County	CALHOUN
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?	Owner Operator
What is the applicant's Customer Number (CN)?	CN600130017
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Formosa Plastics Corporation, Texas
Texas SOS Filing Number	5107506
Federal Tax ID	222355464
State Franchise Tax ID	12223554648
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	JAY
Middle	
Last	SU
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 applicable)	9 PEACH TREE HILL RD
Routing (such as Mail Code, Dept., or Attn:)	
City	LIVINGSTON
State	NJ
ZIP	07039
Phone (###-###-####)	9737167188
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	

Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application	
Select existing DAR contact or enter a new contact.	MIKE RIVET(FORMOSA PLASTIC...)
Organization Name	FORMOSA PLASTICS CORPORATION TEXAS
Prefix	MR
First	MIKE
Middle	
Last	RIVET
Suffix	
Credentials	
Title	ASSISTANT VICE PRESIDENT/GENERAL MANAGER
Enter new address or copy one from list	
Mailing Address	
Address Type	Domestic

Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 700
Routing (such as Mail Code, Dept., or Attn:)	
City	POINT COMFORT
State	TX
Zip	77978
Phone (###-###-####)	3619877000
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	tlasater@ftpc.fpcusa.com

Technical Contact

Person TCEQ should contact for questions about this application:	
Select existing TC contact or enter a new contact.	LEANN USOFF(FORMOSA PLASTIC...)
Organization Name	FORMOSA PLASTICS CORPORATION TEXAS
Prefix	MS
First	LEANN
Middle	
Last	USOFF
Suffix	
Credentials	
Title	ASSISTANT MANAGER OF AIR PERMITTING
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 700
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:	SOP
2) Permit Latitude Coordinate:	28 Deg 41 Min 20 Sec
3) Permit Longitude Coordinate:	96 Deg 32 Min 50 Sec
4) Is this submittal a new application or an update to an existing application?	Update
4.1. Select the permit/project number for which this update should be applied.	4166-36614

5) Who will electronically sign this Title V application?	Duly Authorized Representative
6) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

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

Attach OP-ACPS (Application Compliance Plan and Schedule)

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 Void Request Form

Attach any other necessary information needed to complete the permit.

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

[File Properties]

File Name	PE3+Title+V+(O4166)+Permit+Significant+Revision+OP-CR01+Certification+of+Changes-05.09.2025.signed.pdf
Hash	43DD8C1205D2FA64C49A363DE33883197F28C4C2484403ACD2C35A5E8D1E18C8
MIME-Type	application/pdf

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 4166.
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:	2025-05-09
Signature Hash:	C4BBB84F08B181D4753B0774F9A4B2D9B05E24A405130574886B4284547F9FC7
Form Hash Code at time of Signature:	39D92B4E8900AF326C393C3B23273FF9C236119855770B56FEBC2D50FBFE4102

Submission

Reference Number:	The application reference number is 783348
Submitted by:	The application was submitted by ER093335/Mike Rivet
Submitted Timestamp:	The application was submitted on 2025-05-09 at 17:09:48 CDT
Submitted From:	The application was submitted from IP address 172.108.196.196
Confirmation Number:	The confirmation number is 652271
Steers Version:	The STEERS version is 6.91
Permit Number:	The permit number is 4166

Additional Information

Application Creator: This account was created by Eric Quiat

Formosa Plastics®

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

May 9, 2025

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
TCEQ Air Quality Account Number: CB-0038-Q
Customer Reference Number: CN600130017
Regulated Entity Number: RN100218973
PE3 Plant Title V Permit Number O4166 Permit Renewal Application

To Whom It May Concern:

Pursuant to 30 TAC §122.241, Formosa Plastics Corporation, Texas (FPC TX) hereby submits certification of changes to the permit renewal application for the High Density Polyethylene 3 (PE3) Plant Title V Operating Permit Number O4166 at our Calhoun County, Point Comfort complex.

Please find attached the attached OP-CRO1 form certifying the changes from May 03, 2024 through May 01, 2025.

Should you have any questions, please contact Mrs. LeAnn Usoff at LeAnnU@ftpc.fpcusa.com.

Sincerely,

Mike Rivet
Assistant Vice President / General Manager
Formosa Plastics Corporation, Texas

Enclosures

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)

EPA Region VI Office
Electronic Delivery: R6AirPermitsTX@epa.gov

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program
Texas Commission on Environmental Quality

All initial issuance, revision, renewal, and reopening permit application 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.: CB0038Q	
Permit No.: O4166	
Project No.: 36614	
Area Name: PE3 Plant	
Company Name: Formosa Plastics Corporation, Texas	
II. Certification Type *(Please mark appropriate box)*	
☐ Responsible Official Representative	☒ Duly Authorized Representative
III. Submittal Type *(Please mark appropriate box) (Only one response can be accepted per form)*	
☐ SOP/TOP Initial Permit Application	☐ Permit Revision, Renewal, or Reopening
☐ GOP Initial Permit Application	☒ Update to Permit Application
☐ Other:	

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program
Texas Commission on Environmental Quality

IV. Certification of Truth

This certification does not extend to information which is designated by TCEQ as information for reference only.

I, Mike Rivet certify that I am the Duly Authorized Representative (DAR)

(Certifier Name printed or typed) *(RO or DAR)*

and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:
Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).

Time Period: From 05/03/2024 to 05/01/2025

(Start Date) *(End Date)*

Specific Dates: _____ _____ _____ _____

(Date 1) *(Date 2)* *(Date 3)* *(Date 4)*

_____ _____

(Date 5) *(Date 6)*

Signature: Signed in STEERS Signature Date: _____

Title: _____

From: eric.quiat@powereng.com
To: Jasmine Yuan
Cc: sally.carroll@powereng.com; LeAnn M. Usoff/FTEHSF
Subject: RE: Technical Review - O4166 Formosa Plastics Corporation, Texas (Significant, 36614)
Date: Tuesday, April 1, 2025 10:41:55 AM

Thank you Jasmine. Please let us know when your team leader/management review is complete and we can then prepare the OP-CRO1 form. Its usually best in case any changes come up from TCEQ final management review.

ERIC QUIAT, P.E.
Sr. Project Manager

512.579.3823
512.496.7655 cell

POWER Engineers
Member of WSP
www.powereng.com

From: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>
Sent: Tuesday, April 1, 2025 9:35 AM
To: Quiat, Eric <eric.quiat@powereng.com>
Cc: Carroll, Sally <sally.carroll@powereng.com>; LeAnn M. Usoff/FTEHSF <LeAnnU@ftpc.fpcusa.com>
Subject: [EXTERNAL] RE: Technical Review - O4166 Formosa Plastics Corporation, Texas (Significant, 36614)

The remaining steps are self QAQC, peer QAQC, team leader review, manager/director review.
You can submit OP-CRO1 to certify now or wait until peer QAQC review.
Jasmine

From: eric.quiat@powereng.com <eric.quiat@powereng.com>
Sent: Tuesday, April 1, 2025 8:23 AM
To: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>
Cc: sally.carroll@powereng.com; LeAnn M. Usoff/FTEHSF <LeAnnU@ftpc.fpcusa.com>
Subject: RE: Technical Review - O4166 Formosa Plastics Corporation, Texas (Significant, 36614)

Jasmine,

The final WDP looks good to proceed with. Is your management done with their review? Shall we prepare a final OP-CRO1 to certify all changes since the application? Is so, please confirm the date range that we should use.

Thank you,

ERIC QUIAT, P.E.
Sr. Project Manager

512.579.3823
512.496.7655 cell

POWER Engineers
Member of WSP
www.powereng.com

[hubs.ly]

From: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>
Sent: Friday, March 28, 2025 7:03 PM
To: Quiat, Eric <eric.quiat@powereng.com>
Cc: Carroll, Sally <sally.carroll@powereng.com>; LeAnn M. Usoff/FTEHSF <LeAnnU@ftpc.fpcusa.com>
Subject: [EXTERNAL] RE: Technical Review - O4166 Formosa Plastics Corporation, Texas (Significant, 36614)

Eric
I removed the term "** See Alternative Requirement" from PE3-12 ARS table.
The final draft is attached for your final approval.
Please respond to this email at your earliest convenience.
Thank you!
Jasmine Yuan

From: eric.quiat@powereng.com <eric.quiat@powereng.com>
Sent: Tuesday, March 25, 2025 2:21 PM
To: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>
Cc: sally.carroll@powereng.com; LeAnn M. Usoff/FTEHSF <LeAnnU@ftpc.fpcusa.com>
Subject: RE: Technical Review - O4166 Formosa Plastics Corporation, Texas (Significant, 36614)

Jasmine,

This combination of projects was indeed discussed last year and we need to continue to keep these as separate projects. Formosa would like the significant revision moved forward as soon as possible, as the start of operation of the NSR-authorized project requires this significant revision to be processed and issued. Please keep them separate and let us know what the schedule looks like for the final public notice package for the significant revision.

ERIC QUIAT, P.E.
Sr. Project Manager

512.579.3823
512.496.7655 cell

POWER Engineers
Member of WSP
www.powereng.com

[hubs.ly]

From: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>

Sent: Tuesday, March 25, 2025 1:02 PM
To: Quiat, Eric <eric.quiat@powereng.com>
Cc: Carroll, Sally <sally.carroll@powereng.com>; LeAnn M. Usoff/FTEHSF <LeAnnU@ftpc.fpcusa.com>
Subject: [EXTERNAL] RE: Technical Review - O4166 Formosa Plastics Corporation, Texas (Significant, 36614)

Hi Eric
I saw your have a renewal application for O4166, Project 37541.
Do you want I combine the renewal into this significant revision?
This significant revision will turn into renewal.
Or you want I work it separately?
Jasmine

From: eric.quiat@powereng.com <eric.quiat@powereng.com>
Sent: Tuesday, March 4, 2025 8:19 AM
To: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>
Cc: sally.carroll@powereng.com; LeAnn M. Usoff/FTEHSF <LeAnnU@ftpc.fpcusa.com>
Subject: RE: Technical Review - O4166 Formosa Plastics Corporation, Texas (Significant, 36614)

Jasmine,

We have just one comment on the revised draft SOP: please remove the "**See Alternative requirement" text that was added on the Chapter 111 regulation for the cooling tower. The justification is that the alternative requirement (AMOC 66) cites VOC sampling methods and is not related to visible emissions, so this reference to the alternative requirements needs to be removed from the Chapter 111 section. The reference to the cooling tower periodic monitoring can stay.

If you can remove that, send us a final draft we can approve and then provide you with a final OP-CRO1 certification form after you confirm that the TCEQ technical review, including management review is complete.

ERIC QUIAT, P.E.
Sr. Project Manager

512.579.3823
512.496.7655 cell

POWER Engineers
Member of WSP
www.powereng.com

[hubs.ly]

From: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>
Sent: Friday, February 28, 2025 9:41 AM
To: Quiat, Eric <eric.quiat@powereng.com>
Cc: Carroll, Sally <sally.carroll@powereng.com>; LeAnn M. Usoff/FTEHSF <LeAnnU@ftpc.fpcusa.com>
Subject: [EXTERNAL] RE: Technical Review - O4166 Formosa Plastics Corporation, Texas (Significant, 36614)

See attached.
The "** See alternative requirement" is added to cooling tower though I don't see the permit O4166 and PE3-12 in the AMOC.
Please confirm the draft by March 7.
Jasmine

From: eric.quiat@powereng.com <eric.quiat@powereng.com>
Sent: Tuesday, February 25, 2025 2:52 PM
To: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>
Cc: sally.carroll@powereng.com; LeAnn M. Usoff/FTEHSF <LeAnnU@ftpc.fpcusa.com>
Subject: RE: Technical Review - O4166 Formosa Plastics Corporation, Texas (Significant, 36614)

Jasmine,

On Item 1, please include AMOC 66 (attached) with the Title V permit as it is still relevant. A page 79 of the OP-REQ1 form is also attached as you requested.

On items 2 and 3 below, we agree that you can leave the draft permit as-is based on your reasoning. Please proceed with your version of the draft permit on these citations.

On item 4, thank you for including these permit shields. Formosa's Point Comfort site actually spans across two counties: Calhoun and Jackson. Calhoun is covered in Chapter 115 and Jackson is not, so it is important to distinguish between the two locations for applicability at Formosa's site.

On Item 5, the permit issuance date of 9/22/2023 is correct, please proceed with that date as you have it in the draft permit.

On item 6, Page 83 of the OP-REQ1 form is attached with this question addressed.

Please let us know if you need anything else. We will stand ready to review the revised draft permit when it is available.

Thank you,

ERIC QUIAT, P.E.
Sr. Project Manager

512.579.3823
512.496.7655 cell

POWER Engineers
Member of WSP
www.powereng.com [linkprotect.cudasvc.com]

[linkprotect.cudasvc.com]

From: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>
Sent: Wednesday, February 19, 2025 10:35 AM

From: eric.quiat@powereng.com
Sent: Tuesday, February 25, 2025 2:52 PM
To: Jasmine Yuan
Cc: sally.carroll@powereng.com; LeAnn M. Usoff/FTEHSF
Subject: RE: Technical Review - O4166 Formosa Plastics Corporation, Texas (Significant, 36614)
Attachments: AMOC No. 66 from Polyethylene Permit O1957-05.30.19 with Memo.pdf; OP-REQ1 page 79.pdf; OP-REQ1 page 83.pdf

Jasmine,

On Item 1, please include AMOC 66 (attached) with the Title V permit as it is still relevant. A page 79 of the OP-REQ1 form is also attached as you requested.

On items 2 and 3 below, we agree that you can leave the draft permit as-is based on your reasoning. Please proceed with your version of the draft permit on these citations.

On item 4, thank you for including these permit shields. Formosa's Point Comfort site actually spans across two counties: Calhoun and Jackson. Calhoun is covered in Chapter 115 and Jackson is not, so it is important to distinguish between the two locations for applicability at Formosa's site.

On Item 5, the permit issuance date of 9/22/2023 is correct, please proceed with that date as you have it in the draft permit.

On item 6, Page 83 of the OP-REQ1 form is attached with this question addressed.

Please let us know if you need anything else. We will stand ready to review the revised draft permit when it is available.

Thank you,

ERIC QUIAT, P.E.
Sr. Project Manager

512.579.3823
512.496.7655 cell

POWER Engineers
Member of WSP
www.powereng.com [linkprotect.cudasvc.com]

[linkprotect.cudasvc.com]

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 14, 2016

MR RICK CRABTREE
ASSISTANT GENERAL MANAGER
FORMOSA PLASTICS CORPORATION TEXAS
PO BOX 700
POINT COMFORT TX 77978-0700

Re: Alternative Method of Compliance (AMOC) No. 66
Alternative Monitoring For Cooling Towers
Formosa Point Comfort Plant
Regulated Entity Number: RN100218973
Customer Reference Number: CN600130017
Associated Permit Numbers: 7699, 19166, 19167, 19168, 19198, 19199, 19200, 19201, 20203, 40157, 76044, 76305, 91780, 107518, 107520, 127838, 128752, HAP10, PSDTX1053, PSDTX1058, PSDTX1222, PSDTX1224, PSDTX1226, PSDTX1232, PSDTX1234, PSDTX1237, PSDTX1238, PSDTX1240, PSDTX1383, PSDTX1384, PSDTX226M7, PSDTX760M9, O1484, O1951, O1953, O1954, O1956, O1957, O1958, O3409, and O3421

Dear Mr. Crabtree:

This correspondence is in response to Formosa Plastics Corporation, Texas's (Formosa's) request for Alternative Monitoring for all cooling towers (CT) at the Formosa Point Comfort Plant. The AMOC is used to comply with requirements for sampling and analysis of VOCs in cooling tower feed water and makeup water.

We understand that Formosa is requesting **clarification and confirmation of the alternative VOC sampling procedure for all authorized CT at the site installed on similar product processes (see Attachment 1). This alternative method was previously approved for Formosa on** December 2, 1992, January 11, 1996, and August 1997.

The alternative VOC sampling (referenced in historical correspondence as FPC TX VOC IN WATER AND WASTEWATER) is equivalent to Test Method 8020A. The method is detailed in Attachment 2 and should provide representative concentrations of non-methane hydrocarbons to comply with the above-referenced permits. This alternative method does not apply to any requirements that may in 40 Code of Federal Regulations Part 60, New Source Performance Standards (NSPS), 40 Code of Federal Regulations Part 61, National Emission Standards for Hazardous Air Pollutants (NESHAP), or 40 Code of Federal Regulations Part 63, Maximum Achievable Control Technology (MACT) Standards for Hazardous Air Pollutants.

Re: AMOC #66

The Texas Commission on Environmental Quality (TCEQ) Executive Director has made a final decision to approve your AMOC request. You are reminded that approval of any AMOC shall not abrogate the Executive Director or Administrator's authority under the Act or in any way prohibit later canceling the AMOC.

This AMOC approval may supersede certain requirements or representations in Permit Nos. 7699, 19166, 19167, 19168, 19198, 19199, 19200, 19201, 20203, 40157, 76044, 76305, 91780, 107518, 107520, 127838, 128752, HAP10, PSDTX1053, PSDTX1058, PSDTX1222, PSDTX1224, PSDTX1226, PSDTX1232, PSDTX1234, PSDTX1237, PSDTX1238, PSDTX1240, PSDTX1383, PSDTX1384, PSDTX226M7, and PSDTX760M9. To ensure effective and consistent enforceability, we request that Formosa incorporate this AMOC into the permit(s) through submittal of alteration(s) no later than 90 days after this approval, if not already included.

This approval may also change applicable requirements for the site, which are identified in the site operating permits (SOP) O1484, O1951, O1953, O1954, O1956, O1957, O1958, O3409, and O3421. The TCEQ recommends the submittal of a SOP administrative revision if any changes are necessary. Changes meeting the criteria for an administrative revision can be operated before issuance of the revision if a complete application is submitted to the TCEQ and this information is maintained with the SOP records at the site.

If you need further information or have any questions, please contact Ms. Anne Inman, P.E. at (512) 239-1276 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

This action is taken under authority delegated by the Executive Director of the TCEQ.

Sincerely,

Michael Wilson, P.E., Director
Air Permits Division
Office of Air
Texas Commission on Environmental Quality

cc: Air Permits Section Chief, New Source Review Section (6PD-R), U.S. Environmental Protection Agency, Region 6, Dallas

Project Number: 255806

bcc: Air Section Manager, Region 14 - Corpus Christi
Rebecca Partee, Manager, Chemical Section, Air Permits Division, OA: MC-163

Attachment 1 – Summary of Cooling Towers and Authorizations				
Permit Nos.	**Type of Process**	**Plant**	**EPNs**	**Previous Approval**
19166, HAP10, PSDTX760M9, O1951	Inorganic	Utilities Plant	Not identified on MAERT	12/2/1992
19167, O1953	Inorganic	Caustic Chlorine Plant	Not identified on MAERT (shares with EDC-CT)	1/11/1996
76044, PSDTX1053, O3421	Inorganic	Pet Coke / Coal Fired Generation	CT-1 through CT-12	N/A
19168, PSDTX1226, O1958	Organic Olefins	Olefins I Olefins II GHU PPU FRACII	1010 1064 8801U FRACII-CT	N/A
107518, PSDTX1383 SOP PENDING	Organic Olefins	Olefins III PDH	OL3-CTWR PDH-CWTR	N/A
19201, PSDTX1232 O1957	Organic Polyolefins	HDPE I	PO-CT	1/11/1996
40157, PSDTX1222 O1957	Organic Polyolefins	HDPE II	PP2-CT	N/A
20203, PSDTX1224 O1957	Organic Polyolefins	LLDPE	LL-CT	12/2/1992
107520, PSDTX1384 SOP PENDING	Organic Polyolefins	LDPE	LD-CT	N/A
19200, PSDTX1237, O1956	Organic Polyolefins	Polypropylene I Plant (PP I)	PO-CT PP1-CT	1/11/1996
91780, PSDTX1240 O1956	Organic Polyolefins	PP II	PP20CT	N/A
127838 SOP PENDING	Organic Polyolefins	HDPE 3	PE3-12	N/A
19199, PSDTX1238 O1953	Organic Other	Ethylene Dichloride (EDC)	2C-C1 2C-C2 EDC-CT	
7699, PSDTX226M7 O1954	Organic Other	EDC Cracking, VCM, PVC	999 VW-C02 VW-C11	12/2/1992
19198, PSDTX1234 O1484	Organic Other	Ethylene Glycol (EG)	EG-CT	8/1997
128752 SOP PENDING	Organic Other	EG 2	EG2-CT	N/A
76305, PSDTX1058 O3409	Organic Other	Specialty PVC	CT-01	N/A

Attachment 2

VOC in Water and Wastewater by TACB-VOC Method Procedure

LABORATORY STANDARD OPERATING PROCEDURES

VOC IN WATER AND WASTEWATER BY TACB-VOC METHOD

Revision Number 5

1.0 PURPOSE *

In an effort to maintain Quality, Efficiency, Safety, and Environmental Responsibility, this procedure has been developed for L.S. & Q.A. Department Operation.

2.0 SCOPE *

This method is for the analysis of water and wastewater samples containing volatile organic compounds (VOC) and non-methane hydrocarbons (NMHC). It is intended for analyzing treated and un-treated water and wastewater streams permitted in FPC expansion complex.
This method can be used to quantitate volatile organic compounds that have boiling points less than 200°C and are insoluble or slightly soluble in water.

3.0 ORGANIZATIONS AFFECTED

This procedure affects operation within the L.S. & Q.A. Department and any other department that may request this analysis.

4.0 RESPONSIBILITIES

Personnel	Responsibility
Management/Supervision	Responsible for development and implementation of the procedure, training material, and training of subordinates
QA/QC	Responsible for auditing the performance of the procedure.
Lab Technician	Responsible for knowing and performing analysis per procedure.

5.0 DEFINITIONS

VOC *Volatile Organic Compounds (VOC)* are organic compounds that have boiling points approximately less than 200°C.

6.0 KEY POINTS

Not applicable.

7.0 POLICIES *

This procedure has been developed to insure adherence to FPC Quality, Environmental, Health, and Safety Policies, FPC Corporate Total Quality Management Policies, L.S. & Q.A. Department Quality Management Plan and L.S. & Q.A. Department Quality Assurance Project Plan.

8.0 GUIDELINES

Summary

Volatile organic compounds (VOC) are extracted from sample by purge and trap techniques. Stripped sample components are swept to the gas chromatograph inlet where the individual components are detected using a flame ionization detector. The resultant peaks are summed and quantitated against external calibration curve constructed using benzene as a standard.

GC FID

Interferences

Major contaminate peaks are volatile materials in the laboratory and impurities in the inert purging gas carrier gas. A trip blank prepared from organic-free regent water and carried through the sampling and handling protocol can serve as a check for any possible contamination of sample.

Safety Considerations

The use of proper gloves, safety glasses, and PRC should be exercised when using reagents. Exercise caution when working with glassware. Wipe any spills, clean area immediately and dispose of properly. Avoid skin or eye contact, inhalation or ingestion. Do not operate instrument without all protective equipment in place.

Sample Collection and Storage

- Water sample are collected in 40mL vial with a Teflon-lined septum and an open top screw-cap. Two vials per sampling event must be collected at a minimum per sample point. The containers must be filled in such manner that no air bubbles pass through the sample as the container is being filled. Should bubbling occur, the sample must be poured out and the vial refilled. Seal the vial so that no air bubbles are entrapped in it.
- Due to differing solubility and diffusion properties of gases in liquid matrices at different temperatures, it is possible for the sample to generate some headspace during storage. This headspace will appear in the form of micro-bubbles, and should not invalidate a sample for volatile analysis.
- The presence of a macro-bubble , generally indicates either improper sampling technique or a source of gas evolution within the sample, Studies conducted by the USEPA (BMSL-Ci, unpublished data) indicate that "pea-sized" bubbles (i.e. diameter < ¼ in.) did not adversely affect volatiles data. These bubbles were generally encountered in wastewater samples, which are more susceptible to variations in gas solubility than are groundwater samples.

7.0 POLICIES *

This procedure has been developed to insure adherence to FPC Quality, Environmental, Health, and Safety Policies, FPC Corporate Total Quality Management Policies, L.S. & Q.A. Department Quality Management Plan and L.S. & Q.A. Department Quality Assurance Project Plan.

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QC Requirements

QC	DESCRIPTION	FREQUENCY	CRITERIA	CORRECTIVE ACTION
MB	Method blank; Organic-free reagent water	1/10 sample	< 20 ppb Which is the amount of the lowest std.	Investigate system contamination; correct the problem and reanalyze the samples.
ICV	Initial Calibration verification. Benzene: 100 ppb.	1/10 sample	20% deviation from actual value. (80 ppb-120 ppb)	Check instrument malfunction. Correct the instrument problem and reanalyze. Perform initial calibration after the third failure.

Calculations

Deviation(%)

$$D = \frac{|X - T|}{T} \times 100$$

Where, D = percent deviation
X = the observed value for the measurement
T = "actual" value for the measurement

Precision and Accuracy

None

Reporting

1. Analytical reporting limit is 20 ppb (ug/L).
2. All verified results must be entered in LIMS and/or the appropriate non-routine log sheet upon completion.
3. For the purpose of reporting to applicable agencies, preliminary results from LIMS may be used to prevent greater than 48hr delay in reporting time.

9.0 PROCEDURES*

9.1 *Standard Preparation*

9.1.2 Calibration Standards

Fill 40 mL VOA vials with reagent water, taking care not to trap any air in the vial. Add the Calibration Standard (AS-E0004) to the vial using a clean microsyringe basing on following list to prepare the calibration standards:

	Stock solution
Blank	0.0 uL
20 ppb	0.8 uL
50 ppb	2.0 uL
100 ppb	4.0 uL
250 ppb	10.0 uL
500 ppb	20.0 uL
1000 ppb	40.0 uL

9.1.3 Initial Calibration Verification Standard: Upon opening the certified benzene standard (e.g. M502-01-10X), transfer to a 1 mL reaction vial and cap with a syringe valve. This standard may be good up to 6 months, but should be replaced if ICV fails. Fill a 40 mL VOA vial with Reagent water, taking care not to trap any air in the vial. Add 2.0 uL to the vial using a clean microsyringe for a 100 ppb std.

9.1.4 All standard preparation activities must be logged in the standards logbook.

9.2 *Instrument Setup*

9.2.1 GC/PID is configured as follows:

Inlet

Mode: split	Gas: Helium
Heater:	250 °C
Pressure:	6.9 psi
Total Flow:	102 mL/min
Split ratio:	9:1
Split Flow:	90 mL/min

Column

Mode:	Const Pressure
Pressure:	6.9 psi
Flow:	10.0 mL/min
Average Velocity:	66 cm/sec.

Oven:
Setpoint: 50 °C

Oven Maximum: 300 °C
Equilibration: 0.5 min

Oven Ramp	°C/min	Next °C	Hold min	Run time
Initial		50	2.00	2.00
Ramp 1	20.00	250	9.00	16.00
Post Run		50	0	16.00

Detector:

Heater:	280 °C
H2 flow	40.0 mL/min
Air Flow	450 ml/min
Makeup Flow (He):	25.0 mL/min
Flame:	On

9.2.2 Purge-and-Trap (OI 4560):

Purge flow	35 mL/min
Purge	11 min at 25 °C
Desorb	2 min at 180 °C
Bake	10 min at 185 °C
Transfer line	100 °C
Valve	100 °C
Sample size	5 mL
Drypurge	1min

9.3 ***Re- Calibration***

9.3.1 Recalibration is recommended once a year or when new ICV fails 20% recovery. Prior to re-calibration, GC and samplers must be baked out. Raise the GC oven temp to 250°C and bake for at least 30 min. It is also necessary to cycle the purge-and-trap through one bake cycle to ensure that there are no contaminates present in the trap. After 30 min lower GC temp to 50°C.

9.3.2 Prepare the calibration standards as outlined in 9.1.2 just prior to analysis. Load the standard vials in the correct slots of the autosampler and prepare following re-calibration sequence in the **Method and Run control window** of the Chemstation Software. Start the sequence by following steps from 9.4.4 to 9.4.9.

Re-calibration sequence:

Line	Vial	Sample Name	Method Name	Inj/Vial	Sample Type	Cal Level	Update RF	Update RT
1	1	MB (Blank)	TACB-VOC	1	Sample			
2	1	20 ppb	TACB-VOC	1	Calibration	1	Replace	No Update
3	1	50 ppb	TACB-VOC	1	Calibration	2	Replace	No Update
4	1	100 ppb	TACB-VOC	1	Calibration	3	Replace	Replace
5	1	250 ppb	TACB-VOC	1	Calibration	4	Replace	No Update
6	1	500 ppb	TACB-VOC	1	Calibration	5	Replace	No Update
6	1	1000 ppb	TACB-VOC	1	Calibration	6	Replace	No Update

9.3.3 In the **data analysis window** of the Chemstation Software, load the chromatogram for the blank (reagent water). Check to see that there are no contamination peaks. For some low level analysis, a small peak will show at the beginning of the run. This is due to a pressure change on column when the sampler injects. If a calibration exists, the run should read less than two times the lower analytical limit for the analysis.

9.3.4 Open the calibration file and check to see that there are only two significant peaks. The first peak will be the solvent or methanol peak. The peaks should be sharp with minimum tailing. If there are more than two peaks, the calibration stock or reagent water is contaminated. Correct this condition and begin the calibration again.

9.3.5 Once the calibration files are integrated, the results must be assembled in a linear calibration curve. Display the calibration curve and check that the fit is at least $R^2 > 0.990$. Calculate a new area reject from the Calibration curve plot "AREA= number value x amount + 0" (the number value is the slope of the calibration curve. The amount is 20). Enter this new area into the integration events table in the value line for each cal.

9.3.6 Calibration should be set to calculate uncalibrated peaks using compound benzene. The parameters should sum all the individual peak areas of chromatogram.

9.4 *Sample Analysis*

9.4.1 *Composite Sample*: A volumetric composite is performed by combining the chilled (4°C) samples collected during a weeklong sampling event in a chilled jar that is surrounded by ice. This must be performed quickly to prevent loss of volatile component. The sample is mixed and transferred to 40mL VOA.

Note: The volumetric composite may not reflect the true emissions over a week long period due to fluctuations in flow rate of the stream to be tested.

9.4.2 For grab samples, directly use the vial that the sample was received in.

9.4.3 Load the samples in the autosampler racks noting their positions.

9.4.4 Bring up the window **P & T 6890C (online): Method & Run control** by Click **Start / Program/HP Chemstation /Instrument online** if it is not opened on the computer monitor.

9.4.5 Click **Sequence/Load Sequence** to load an existing sequence.

9.4.6 Click **Sequence/Sequence Parameter** to change the **Subdirectory** to today's date.

9.4.7 Click **Sequence/Sequence Table** to edit the sequence at the data station.
Enter the sample information in a sequence file located in the data station. Be sure that the vial positions correspond with vial locations and the correct method is chosen for the analysis

Following sequence table is an example:

Line	Vial	Sample Name	Method Name	Inj/Vial	Sample Type
1	1	MB(Blank)	TACB-VOC	1	Sample
2	1	ICV	TACB-VOC	1	Sample
3	1	OL1 CWR 2/5	TACB-VOC	1	Sample
4	1	OL1 CWR 2/5	TACB-VOC	1	Sample
5	1	OL2 CWR 2/08	TACB-VOC	1	Sample
6	1	OL2 CWR 2/08	TACB-VOC	1	Sample
7	1	OHU CWR 2/5	TACB-VOC	1	Sample
8	1	OHU CWR 2/5	TACB-VOC	1	Sample
9	1	T971 2/1-2/7	TACB-VOC	1	Sample
10	1	3T971 2/1-2/7	TACB-VOC	1	Sample
11	1	CWTP 2/1-2/7	TACB-VOC	1	Sample
12	1	LLDPE CWR 2/5	TACB-VOC	1	Sample
13	1	MB	TACB-VOC	1	Sample
14	1	ICV	TACB-VOC	1	Sample
15	1	Sample A	TACB-VOC	1	Sample
16	1	Sample B	TACB-VOC	1	Sample

Note: Method blank and calibration verification need be run every 10 samples.

9.4.8 Press **Run Sequence** button. Now system is ready and waiting for Purge-and-trap device to start.

9.4.9 Purge-and-trap device preparation:
(1) Push **SPL** Button on the front panel, the window will show: **L551** start: end:
(2) Set the start and end positions that need match with actual sample position and run sequence, use **Arrow ON** button and **OFF** button to switch between start and end, then use keypad to key in position number.

(3) Press Enter key, then press Clear button, then press Start button to run the sequence.

9.4.10 Once data have been generated, check that the chromatograms have been integrated correctly. Samples that are 10 % out of the analytical range for the determination must be diluted and re-analyzed using the appropriate methodology (See table 1).

10.0 TRAINING REQUIREMENTS *

Personnel who perform this analysis will be required to complete the following training requirements:

Period	Requirement
Initial	SOP Training, Test, and Job Qualification
Annual Refresher and Procedure Revision	SOP Training and Test
Audit Finding	SOP Training, Test, and Job Qualification

11.0 FLOWCHART

Not applicable

12.0 REFERENCES

1. "Guidelines for preparation of Policies, Guidelines, and Procedures," FPC TQM Manual.
2. Test Method for Evaluating Solid Waste (SW-846), "Determinative Chromatographic Separations," Revision 3, March 2003, Method 8000C.
3. Test Method for Evaluating Solid Waste (SW-846), "purge and Trap for Aqueous Samples," Revision 3, May 2003, Method 5030C.
4. Test Method for Evaluating Solid Waste (SW-846), "Organic Analytes," Revision 4, February 2007, Chapter Four, Section I, (for sample storage)

13.0 RECORD RETENTION PERIOD

Records produced using this procedure will be retained for a period of no less than 5 years.

14.0 ATTACHMENTS

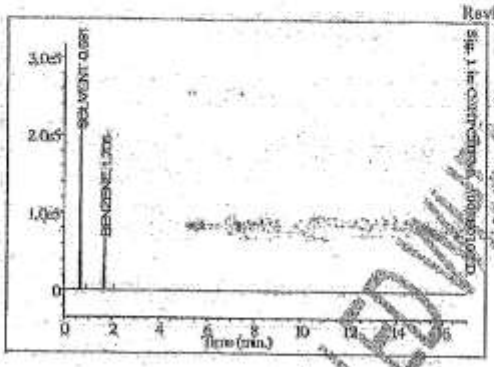
Table 1
Figure 1: Chromatogram of Calibration Standard and sample run
Attachment 1: TNRCC Approval Letter.

TABLE 1. Examples of sample dilution

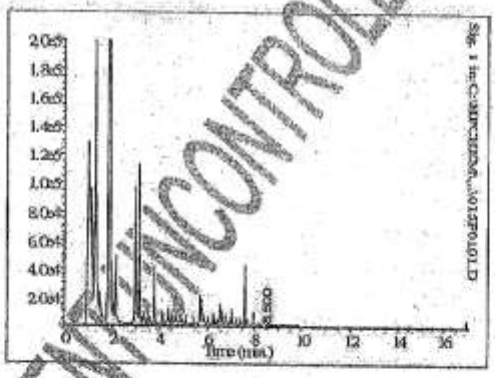
Add the required amount of high concentration sample to a 50 mL volumetric flask, and then bring level to exact 50 mL with organic-free reagent water.

Dilution factor	High concentration sample	Total volume
30000	1.67 µL	50 mL
20000	2.5 µL	50 mL
10000	5 µL	50 mL
5000	10 µL	50 mL
4000	12.5 µL	50 mL
3000	16.7 µL	50 mL
2000	25 µL	50 mL
1000	50 µL	50 mL
500	100 µL	50 mL
400	125 µL	50 mL
300	167 µL	50 mL
200	250 µL	50 mL
100	500 µL	50 mL
90	556 µL	50 mL
80	625 µL	50 mL
70	714 µL	50 mL
60	833 µL	50 mL
50	1 ml	50 mL
40	1.25 mL	50 mL
30	1.67 mL	50 mL
20	2.5 mL	50 mL
10	5 mL	50 mL
5	10 mL	50 mL
2	25 mL	50 mL

Figure 1: Sample Chromatogram
Calibration Standard Run



Sample Run



Attachment 1: TNRCC Approval Letter

The next page is a copy of the approval letter from the TNRCC.

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 83)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/20/2025	O4166	RN100218973

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

XI.	**Miscellaneous (continued)**		
	J.	**Title 30 TAC Chapter 101, Subchapter H (continued)**	
♦	4.	The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area where the facilities have a collective uncontrolled design capacity to emit 10 tpy or more of NO_X. *If the response to Question XI.J.4 is "Yes," go to Question XI.J.6.*	☐ Yes ☐ No
♦	5.	The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area where the facilities previously had a collective uncontrolled design capacity to emit 10 tpy or more of NO_X and is subject to 101.351(c).	☐ Yes ☐ No
	6.	The application area includes an electric generating facility permitted under 30 TAC Chapter 116, Subchapter I.	☐ Yes ☐ No
♦	7.	The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area and the site has a potential to emit more than 10 tpy of highly reactive volatile organic compounds (HRVOC) from facilities covered under 30 TAC Chapter 115, Subchapter H, Divisions 1 and 2.	☐ Yes ☐ No
♦	8.	The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area, the site has a potential to emit 10 tpy or less of HRVOC from covered facilities and the applicant is opting to comply with the requirements of 30 TAC Chapter 101, Subchapter H, Division 6, Highly Reactive VOC Emissions Cap and Trade Program.	☐ Yes ☐ No
	K.	**Periodic Monitoring**	
♦	1.	The applicant or permit holder is submitting at least one periodic monitoring proposal described on Form OP-MON in this application. *If the response to Question XI.K.1 is "Yes," go to Section XI.L.*	☒ Yes ☐ No
♦	2.	The permit currently contains at least one periodic monitoring requirement. *If the responses to Questions XI.K.1 and XI.K.2 are both "No," go to Section XI.L.*	☐ Yes ☐ No
♦	3.	All periodic monitoring requirements are being removed from the permit with this application.	☐ Yes ☐ No

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 79)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/20/2025	O4166	RN100218973

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

XI.	**Miscellaneous (continued)**		
	B.	**Forms**	
♦	1.	The application area contains units that are potentially subject to a regulation for which the TCEQ has not developed a unit attribute form. *If the response to Question XI.B.1 is "No" or "N/A," go to Section XI.C.*	☐ Yes ☐ No ☐ N/A
♦	2.	Provide the Part and Subpart designation for the federal rule(s) or the Chapter, Subchapter, and Division designation for the State regulation(s) in the space provided below.	
	C.	**Emission Limitation Certifications**	
♦	1.	The application area includes units for which federally enforceable emission limitations have been established by certification.	☐ Yes ☐ No
	D.	**Alternative Means of Control, Alternative Emission Limitation or Standard, or Equivalent Requirements**	
	1.	The application area is located at a site that is subject to a site-specific requirement of the state implementation plan (SIP).	☐ Yes ☒ No
	2.	The application area includes units located at the site that are subject to a site-specific requirement of the SIP.	☐ Yes ☒ No
	3.	The application area includes units which demonstrate compliance by using an alternative means of control, alternative emission limitation or standard or equivalent requirements approved by the EPA Administrator. *If the response to Question XI.D.3 is "Yes," please include a copy of the approval document with the application.*	☐ Yes ☒ No
	4.	The application area includes units which demonstrate compliance by using an alternative means of control, alternative emission limitation or standard or equivalent requirements approved by the TCEQ Executive Director. *If the response to Question XI.D.4 is "Yes," please include a copy of the approval document with the application.*	☒ Yes ☐ No

From: Jasmine Yuan
Sent: Wednesday, February 19, 2025 11:35 AM
To: eric.quiat@powereng.com
Cc: LeAnn M. Usoff/FTEHSF; sally.carroll@powereng.com
Subject: RE: Technical Review - O4166 Formosa Plastics Corporation, Texas (Significant, 36614)

Hello Eric
I looked into your comments and feel we are circling back to previous manual edits/build questions. See my feedback to your comments.
1, You requested AMOC. The AMOC is for 08/2023-08/2024. It is not relevant anymore. **So AMOC is not needed**. Moreover, you did not submit OP-REQ1 AMOC section to indicate site has TCEQ approved AMOC. If applicant insists to have AMOC in permit, you need to submit OP-REQ1 of AMOC section. I will update the permit draft to have the term and attachment.
2, On permit draft page 13, you asked keep 2420(e) and more others apply. I believe it is 2520(e). When we responded to your manual change request in December, we replied as this:

- I did not approve replacing the more specific subparagraphs of reporting 63.2520(e) with a grouped citation. Our rule analysis already separates the subparagraphs. In this case, grouping does not serve to make permit clearer and increases chances of error if it needs to be re-entered in the future since it requires adjusting so many citations.

First, we want to reduce manual changes as much as possible. So, even if every single portion of 63.2520(e) applied, that would be extra work for us to delete all the sub-citations and replace with a grouped citation, for no technical benefit. (And that could potentially have to be re-done in future projects.) But secondly, we need to figure out what is correct here. There are a few portions of 63.2520(e) that are in the RRT but that this unit does not pick up. If those particular citations are some of what is needed, then that means that UA answers need to change to indicate those apply. Then furthermore, there are multiple citations that are new in rule amendments that are not yet in the RRT. However, some of those would be listed against other unit types rather than the general process unit, so we want to make sure if those citations are needed that they are being included for the proper units.

3, On page 18 of permit draft, you requested to use 63.2450(k) instead of (k)(8). For this issue, we responded previously as follows

- I also approved the addition of 63.2450(k)(8) to standards and monitoring/testing since it references 63.2450(e)(4), which provides clarification about which portions of referenced citations from MACT SS apply or do not apply.
- I did not approve adding grouped [G]63.2450(k) to standards because most of the group is monitoring or recordkeeping. The portion needed is (k)(8) which is being added.

In RRT, the K series are included. If you think some of citations were not picked up, the reason could be your UA attributes not leading to correct citations. You may need to revise your attributes.

To sum up, for item 2 and 3, you need to tell us what citations you want, then we will re-evaluate and decide either change UA attributes, or do manual edits to add those citations.

4, I will add the permit shields of vent gas control for units VNTHEX-02, VENTPE3-15. Friendly reminder: Permit shield based on location should not be granted. The permit shield should be based on operation, for example, the tank not storing VOC, is shield from 115 VOC storage. But for location, it is never change, shield does not make sense. During the renewal, the permit shields will be re-evaluated.

5, In your application page 63, the major nsr summary table has issuance date of 05/03/2024. I do not see this version in our system. The latest authorization is still 09/22/2023.

6, Please send me OP-REQ1 Section XI.k to show PM answer updated.

Please respond to this email by 02/28/2025 or sooner.
Thank you!
Jasmine Yuan

From: eric.quiat@powereng.com <eric.quiat@powereng.com>
Sent: Friday, January 31, 2025 10:31 AM
To: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>
Cc: LeAnn M. Usoff/FTEHSF <LeAnnU@ftpc.fpcusa.com>; sally.carroll@powereng.com
Subject: RE: Technical Review - O4166 Formosa Plastics Corporation, Texas (Significant, 36614)

Jasmine,

Markups and comments on the draft SOP are attached. A revised OP-UA15 Table 13e is also attached with the cde for 1257A1 changed to “No”.
I see that we did not provide section XI. K of the OP-REQ1 form with the application. Are you requesting that we populate that section?

Regards,

ERIC QUIAT, P.E.
SR. PROJECT MANAGER

512-579-3823
512-496-7655 cell

POWER Engineers, Inc.
www.powereng.com [linkprotect.cudasvc.com]

[linkprotect.cudasvc.com]

From: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>
Sent: Thursday, January 16, 2025 2:34 PM
To: Quiat, Eric <eric.quiat@powereng.com>
Cc: LeAnn M. Usoff/FTEHSF <LeAnnU@ftpc.fpcusa.com>; Carroll, Sally <sally.carroll@powereng.com>

From: eric.quiat@powereng.com
Sent: Friday, January 31, 2025 10:31 AM
To: Jasmine Yuan
Cc: LeAnn M. Usoff/FTEHSF; sally.carroll@powereng.com
Subject: RE: Technical Review - O4166 Formosa Plastics Corporation, Texas (Significant, 36614)
Attachments: SOP - O4166 markup for TCEQ.docx; OP-UA15 Tbl13e 1-31-25.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Jasmine,

Markups and comments on the draft SOP are attached. A revised OP-UA15 Table 13e is also attached with the cde for 1257A1 changed to "No".
I see that we did not provide section XI. K of the OP-REQ1 form with the application. Are you requesting that we populate that section?

Regards,

ERIC QUIAT, P.E.
SR. PROJECT MANAGER

512-579-3823
512-496-7655 cell

POWER Engineers, Inc.
www.powereng.com [linkprotect.cudasvc.com]

[linkprotect.cudasvc.com]

From: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>
Sent: Thursday, January 16, 2025 2:34 PM
To: Quiat, Eric <eric.quiat@powereng.com>
Cc: LeAnn M. Usoff/FTEHSF <LeAnnU@ftpc.fpcusa.com>; Carroll, Sally <sally.carroll@powereng.com>
Subject: [EXTERNAL] RE: Technical Review - O4166 Formosa Plastics Corporation, Texas (Significant, 36614)

Hello
I updated the permit draft based on your inputs.
However,
1, UA15 in your attachment, page 36, Table 13e, code for 1257Al should be No, not NONE.

FEDERAL OPERATING PERMIT

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

AUTHORIZING THE OPERATION OF
Formosa Point Comfort Plant
PEe3 Plant
Petrochemical Manufacturing

LOCATED AT
Calhoun 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: O4166 Issuance Date: _____

_____
For the Commission

Commented [EQ1]: Capitalize

(v) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)

Risk Management Plan

15. For processes subject to 40 CFR Part 68 and specified in 40 CFR § 68.10, the permit holder shall comply with the requirements of the Accidental Release Prevention Provisions in 40 CFR Part 68. The permit holder shall submit to the appropriate agency either a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR § 68.10(a), or as part of the compliance certification submitted under this permit, a certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of a risk management plan.

Protection of Stratospheric Ozone

16. Permit holders at a site subject to Title VI of the FCAA Amendments shall meet the following requirements for protection of stratospheric ozone:

A. Any on site servicing, maintenance, and repair on refrigeration and nonmotor vehicle air-conditioning appliances using ozone-depleting refrigerants or non-exempt substitutes shall be conducted in accordance with 40 CFR Part 82, Subpart F. Permit holders shall ensure that repairs on or refrigerant removal from refrigeration and nonmotor vehicle air-conditioning appliances using ozone-depleting refrigerants are performed only by properly certified technicians using certified equipment. Records shall be maintained as required by 40 CFR Part 82, Subpart F.

Permit Location

17. The permit holder shall maintain a copy of this permit and records related to requirements listed in this permit on site.

Permit Shield (30 TAC § 122.148)

18. A permit shield is granted for the emission units, groups, or processes specified in the attached "Permit Shield." Compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements listed in the attachment "Permit Shield." Permit shield provisions shall not be modified by the executive director until notification is provided to the permit holder. No later than 90 days after notification of a change in a determination made by the executive director, the permit holder shall apply for the appropriate permit revision to reflect the new determination. Provisional terms are not eligible for this permit shield. Any term or condition, under a permit shield, shall not be protected by the permit shield if it is replaced by a provisional term or condition or the basis of the term and condition changes.

Commented [EQ2]: TCEQ -
The AMOC will need to be attached. It was provided in the application.

Also, it seems like we need to add a new condition to address the AMOC:

Alternative Requirements
18. The permit holder shall comply with the approved alternative means of control (AMOC); alternative monitoring, recordkeeping, or reporting requirements; or requirements determined to be equivalent to an otherwise applicable requirement contained in the Alternative Requirements attachment of this permit. Units complying with an approved alternative requirement have reference to the approval in the Applicable Requirements summary listing for the unit. The permit holder shall maintain the original documentation, from the TCEQ Executive Director, demonstrating the method or limitation utilized. Documentation shall be maintained and made available in accordance with 30 TAC § 122.144.

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
GRP-VENT	EU	60DDD-2	VOC/TOC	40 CFR Part 60, Subpart DDD	§ 60.560(g)	Vent streams emitting continuous emissions with uncontrolled annual emissions of < 1.6 Mg/yr (1.76 Tons/yr) or with weight % TOC of < 0.10 % from facilities as specified, exempted from §60.562-1(a)(1).	[G]§ 60.564(d)	§ 60.565(a) § 60.565(a)(10) § 60.565(h)	§ 60.565(a) § 60.565(a)(10) § 60.565(k) § 60.565(k)(6) § 60.565(k)(7)
GRP-VENT	EU	60DDD-3	VOC/TOC	40 CFR Part 60, Subpart DDD	§ 60.560(g)	Vent streams emitting continuous emissions with uncontrolled annual emissions of < 1.6 Mg/yr (1.76 Tons/yr) or with weight % TOC of < 0.10 % from facilities as specified, exempted from §60.562-1(a)(1).	[G]§ 60.564(d)	§ 60.565(a) § 60.565(a)(10) § 60.565(h)	§ 60.565(a) § 60.565(a)(10) § 60.565(k) § 60.565(k)(6) § 60.565(k)(7)
PE3 UNIT	PRO	63FFFF-1	112(B) HAPS	40 CFR Part 63, Subpart FFFF	§ 63.2440(a) § 63.2450(a)(2) § 63.2450(c)(2) [G]§ 63.2450(e)(4) § 63.2450(l) § 63.2450(r) § 63.2450(u) [G]§ 63.2450(v)	This subpart applies to each miscellaneous organic chemical manufacturing affected source.	§ 63.2445(d) § 63.2450(g)(6) § 63.2450(g)(7) [G]§ 63.2450(v)	§ 63.2525 § 63.2525(a) [G]§ 63.2525(b) § 63.2525(j) [G]§ 63.2525(l) [G]§ 63.2525(m) § 63.2525(n) [G]§ 63.2525(p)	§ 63.2435(d) § 63.2445(c) § 63.2450(g)(5) § 63.2450(m) § 63.2450(m)(1) § 63.2450(m)(2) § 63.2515(a) § 63.2515(b)(2) § 63.2515(c) § 63.2520(a) § 63.2520(a)-Table 11.1 § 63.2520(a)-Table 11.2 § 63.2520(a)-Table 11.3 [G]§ 63.2520(b) [G]§ 63.2520(c) [G]§ 63.2520(d) § 63.2520(e) ~~§ 63.2520(e)(1)~~ ~~[G]§ 63.2520(e)(10)~~ ~~[G]§ 63.2520(e)(14)~~

Commented [EQ3]: TCEQ - keep 2420(e) and remove the others below. More than just these others could apply

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
									~~§ 63.2520(e)(2)~~ ~~§ 63.2520(e)(3)~~ ~~§ 63.2520(e)(4)~~ ~~§ 63.2520(e)(5)~~ ~~§ 63.2520(e)(5)(i)~~ ~~[G]§ 63.2520(e)(5)(ii)~~ ~~[G]§ 63.2520(e)(5)(iii)~~ ~~§ 63.2520(e)(6)~~ ~~§ 63.2520(e)(7)~~ ~~§ 63.2520(e)(9)~~ § 63.2520(f) § 63.2520(g)
PE3-10	CD	R1111-1	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(4)(A)	Visible emissions from a process gas flare shall not be permitted for more than five minutes in any two-hour period. Non-excessive upset events are subject to the provisions under §101.222(b).	§ 111.111(a)(4)(A)(i) § 111.111(a)(4)(A)(ii)	§ 111.111(a)(4)(A)(ii)	None
PE3-10	CD	60A-1	Opacity	40 CFR Part 60, Subpart A	§ 60.18(b) § 60.18(c)(1) § 60.18(c)(2) § 60.18(c)(3)(ii) § 60.18(c)(4)(iii) § 60.18(c)(6) § 60.18(e)	Flares shall comply with paragraphs (c)-(f) of § 60.18.	§ 60.18(d) § 60.18(f)(1) § 60.18(f)(2) § 60.18(f)(3) § 60.18(f)(4) § 60.18(f)(5)	None	None
PE3-10	CD	63A-1	Opacity	40 CFR Part 63, Subpart A	§ 63.11(b)(4) § 63.11(b)(1) § 63.11(b)(2) § 63.11(b)(3) § 63.11(b)(5) § 63.11(b)(6)(ii) § 63.11(b)(7)(iii)	Flares shall be designed and operated with no visible emissions, except for periods of a total of 5 minutes or less during any 2 consecutive hrs. Test Method 22 in App. A of part 60 of this chapter shall be used.	§ 63.11(b)(4) § 63.11(b)(5) § 63.11(b)(7)(i)	None	None
PE3-10	CD	63FFFF-4	Opacity	40 CFR Part 63,	§ 63.670(c)	Visible emissions. The	§ 63.670(b)	[G]§ 63.670(h)	[G]§ 63.670(h)

Commented [JY4]: You used to have 63FFFF-1. I changed it to 63FFFF-4 to match the other unit.

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
				Subpart CC	§ 63.670 § 63.670(b) § 63.670(d) § 63.670(d)(2) § 63.670(e) § 63.670(o) [G]§ 63.670(o)(1) [G]§ 63.670(o)(2) [G]§ 63.670(o)(3) [G]§ 63.670(o)(4) [G]§ 63.670(o)(5) § 63.670(o)(6) [G]§ 63.670(o)(7) [G]§ 63.671(c)	owner or operator shall specify the smokeless design capacity of each flare and operate with no visible emissions, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours, when regulated material is routed to the flare and the flare vent gas flow rate is less than the smokeless design capacity of the flare. The owner or operator shall monitor for visible emissions from the flare as specified in §63.670(h).	§ 63.670(c) § 63.670(d)(2) § 63.670(e) § 63.670(g) [G]§ 63.670(h) [G]§ 63.670(i) [G]§ 63.670(j) [G]§ 63.670(k) [G]§ 63.670(l) [G]§ 63.670(m) [G]§ 63.671(a) [G]§ 63.671(b) [G]§ 63.671(c) [G]§ 63.671(d) [G]§ 63.671(e)	[G]§ 63.670(i) [G]§ 63.670(j) [G]§ 63.670(o)(1) [G]§ 63.670(o)(5) § 63.670(o)(6) § 63.670(p) [G]§ 63.671(a) [G]§ 63.671(b)	[G]§ 63.670(j) [G]§ 63.670(l) [G]§ 63.670(o)(2) § 63.670(q)
PE3-10	EU	63FFFF-4	112(B) HAPS	40 CFR Part 63, Subpart FFFF	[G]§ 63.2450(e)(5) [G]§ 63.2450(k) [G]§ 63.670	For any flare that is used to reduce organic HAP emissions from an MCPU, comply with the requirements of §63.2450(e)(5).	[G]§ 63.2450(e)(5) § 63.2450(k)(8) [G]§ 63.670 [G]§ 63.671	§ 63.2450(e)(5)(xii) § 63.2450(k)(7) [G]§ 63.2525(m)	§ 63.2450(e)(5)(iv) § 63.2450(e)(5)(xi) § 63.2520(a)-Table 11.1 § 63.2520(a)-Table 11.2 § 63.2520(a)-Table 11.3 § 63.2520(d)(3) [G]§ 63.2520(e)(11)
PE3-12	EP	R1111-2	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(1)(C) § 111.111(a)(1)(E)	Visible emissions from any stationary vent shall not exceed an opacity of 15% averaged over a six minute period for any source with a total flow rate of at least 100,000 acfm unless a CEMS is installed.	[G]§ 111.111(a)(1)(F) ** See Periodic Monitoring Summary	None	None
PE3-13	EU	60DDD-4	VOC/TOC	40 CFR Part 60, Subpart DDD	§ 63.2535(h) § 63.2535(h)	For equipment subject to 40 CFR Part 63, Subpart FFFF that is also subject to 40 CFR Part 60, Subpart DDD, the permit holder may elect to apply 40 CFR Part 63,	§ 63.2535(h)	§ 63.2535(h)	§ 63.2535(h)

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
						with 40 CFR Part 60, Subpart DDD.			
VENTPE3-10	EP	63FFFF-1	112(B) HAPS	40 CFR Part 63, Subpart FFFF	§ 63.2455(a)-Table 1.1.a.ii § 63.11(b) § 63.2450(b) [G]§ 63.2450(e)(5) [G]§ 63.2450(e)(6) § 63.2450(k)(8) § 63.2455(a) § 63.2455(b) § 63.2455(b)(1) [G]§ 63.670 § 63.982(b) § 63.983(a)(1) § 63.983(a)(2) § 63.983(d)(1) § 63.983(d)(1)(i) [G]§ 63.983(d)(2) § 63.983(d)(3) § 63.987(a) § 63.987(b)(1) § 63.987(b)(3) [G]§ 63.997(c)(1) § 63.997(c)(3)	For each Group 1continuous process vent, the owner or operator must reduce emissions of total organic HAP by venting emissions through a closed vent system to a flare.	[G]§ 63.115(d)(2)(v) § 63.115(d)(3)(iii) [G]§ 63.2450(e)(5) [G]§ 63.2450(e)(6) § 63.2450(k)(8) [G]§ 63.670 [G]§ 63.671 § 63.983(b) [G]§ 63.983(b)(1) [G]§ 63.983(b)(2) [G]§ 63.983(b)(3) [G]§ 63.983(c)(1) § 63.983(c)(2) § 63.983(c)(3) § 63.983(d)(1) § 63.983(d)(1)(ii) [G]§ 63.987(b)(3)(i) § 63.987(b)(3)(ii) § 63.987(b)(3)(iii) § 63.987(b)(3)(iv) § 63.987(c) § 63.997(a) [G]§ 63.997(c)(1) § 63.997(c)(2) § 63.997(c)(3) § 63.997(c)(3)(i) § 63.997(c)(3)(ii)	§ 63.2450(e)(5)(xii) § 63.2450(f)(2) § 63.2450(f)(2)(i) § 63.2450(f)(2)(ii) § 63.2450(k)(7) [G]§ 63.2525(m) § 63.2525(n) § 63.983(b) [G]§ 63.983(d)(2) § 63.987(b)(1) § 63.987(c) § 63.998(a)(1) [G]§ 63.998(a)(1)(i) § 63.998(a)(1)(ii) § 63.998(a)(1)(iii)(A) § 63.998(a)(1)(iii)(B) [G]§ 63.998(b)(1) [G]§ 63.998(b)(2) [G]§ 63.998(b)(3) [G]§ 63.998(b)(5) [G]§ 63.998(d)(1) § 63.998(d)(3)(i) § 63.998(d)(3)(ii) § 63.998(d)(5)	§ 63.2450(e)(5)(iv) § 63.2450(e)(5)(xi) § 63.2450(f)(2)(ii) § 63.2450(q) § 63.2520(a)-Table 11.1 § 63.2520(a)-Table 11.2 § 63.2520(a)-Table 11.3 § 63.2520(d)(3) [G]§ 63.2520(e)(11) § 63.2520(e)(12) § 63.987(b)(1) § 63.997(c)(3) § 63.998(a)(1)(iii)(A) [G]§ 63.998(b)(3) [G]§ 63.999(a)(1) [G]§ 63.999(a)(2) § 63.999(b)(5) § 63.999(c)(1) § 63.999(c)(2)(i) § 63.999(c)(3) § 63.999(c)(6) [G]§ 63.999(c)(6)(i) § 63.999(c)(6)(iv) [G]§ 63.999(d)(1) [G]§ 63.999(d)(2)
VENTPE3-15	EU	60DDD-1	VOC/TOC	40 CFR Part 60, Subpart DDD	§ 63.2535(h)	For equipment subject to 40 CFR Part 63, Subpart FFFF that is also subject to 40 CFR Part 60, Subpart DDD, the permit holder may elect to apply 40 CFR Part 63, Subpart FFFF to all such equipment. Compliance as described in §63.2535(h)	§ 63.2535(h)	§ 63.2535(h)	§ 63.2535(h)

Commented [EQ5]: TCEQ - this should be 2450(k), since more than just (k)(8) apply

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
						will constitute compliance with 40 CFR Part 60, Subpart DDD.			
VENTPE3-15	EP	63FFFF-1	112(B) HAPS	40 CFR Part 63, Subpart FFFF	§ 63.2455(a)-Table 1.1.a.ii § 63.11(b) § 63.2450(b) [G]§ 63.2450(e)(5) [G]§ 63.2450(e)(6) § 63.2450(k)(8) § 63.2455(a) § 63.2455(b) § 63.2455(b)(1) [G]§ 63.670 § 63.982(b) § 63.983(a)(1) § 63.983(a)(2) § 63.983(d)(1) § 63.983(d)(1)(i) [G]§ 63.983(d)(2) § 63.983(d)(3) § 63.987(a) § 63.987(b)(1) § 63.987(b)(3) [G]§ 63.997(c)(1) § 63.997(c)(3)	For each Group 1 continuous process vent, the owner or operator must reduce emissions of total organic HAP by venting emissions through a closed vent system to a flare.	[G]§ 63.115(d)(2)(v) § 63.115(d)(3)(iii) [G]§ 63.2450(e)(5) [G]§ 63.2450(e)(6) § 63.2450(k)(8) [G]§ 63.670 [G]§ 63.671 § 63.983(b) [G]§ 63.983(b)(1) [G]§ 63.983(b)(2) [G]§ 63.983(b)(3) [G]§ 63.983(c)(1) § 63.983(c)(2) § 63.983(c)(3) § 63.983(d)(1) § 63.983(d)(1)(ii) [G]§ 63.987(b)(3)(i) § 63.987(b)(3)(ii) § 63.987(b)(3)(iii) § 63.987(b)(3)(iv) § 63.987(c) § 63.997(a) [G]§ 63.997(c)(1) § 63.997(c)(2) § 63.997(c)(3) § 63.997(c)(3)(i) § 63.997(c)(3)(ii)	§ 63.2450(e)(5)(xii) § 63.2450(f)(2) § 63.2450(f)(2)(i) § 63.2450(f)(2)(ii) § 63.2450(k)(7) [G]§ 63.2525(m) § 63.2525(n) § 63.983(b) [G]§ 63.983(d)(2) § 63.987(b)(1) § 63.987(c) § 63.998(a)(1) [G]§ 63.998(a)(1)(i) § 63.998(a)(1)(ii) § 63.998(a)(1)(iii)(A) § 63.998(a)(1)(iii)(B) [G]§ 63.998(b)(1) [G]§ 63.998(b)(2) [G]§ 63.998(b)(3) [G]§ 63.998(b)(5) [G]§ 63.998(d)(1) § 63.998(d)(3)(i) § 63.998(d)(3)(ii) § 63.998(d)(5)	§ 63.2450(e)(5)(iv) § 63.2450(e)(5)(xi) § 63.2450(f)(2)(ii) § 63.2450(q) § 63.2520(a)-Table 11.1 § 63.2520(a)-Table 11.2 § 63.2520(a)-Table 11.3 § 63.2520(d)(3) [G]§ 63.2520(e)(11) § 63.2520(e)(12) § 63.987(b)(1) § 63.997(c)(3) § 63.998(a)(1)(iii)(A) [G]§ 63.998(b)(3) [G]§ 63.999(a)(1) [G]§ 63.999(a)(2) § 63.999(b)(5) § 63.999(c)(1) § 63.999(c)(2)(i) § 63.999(c)(3) § 63.999(c)(6) [G]§ 63.999(c)(6)(i) § 63.999(c)(6)(iv) [G]§ 63.999(d)(1) [G]§ 63.999(d)(2)
VNTHEX-02	EU	60DDD-1	VOC/TOC	40 CFR Part 60, Subpart DDD	§ 63.2535(h)	For equipment subject to 40 CFR Part 63, Subpart FFFF that is also subject to 40 CFR Part 60, Subpart DDD, the permit holder may elect to apply 40 CFR Part 63, Subpart FFFF to all such equipment. Compliance as	§ 63.2535(h)	§ 63.2535(h)	§ 63.2535(h)

Commented [EQ6]: TCEQ - this should be 2450(k), since more than just (k)(8) apply

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
PE3-SVD	N/A	40 CFR Part 63, Subpart FFFF	Storage vessel degassing requirements do not apply because there are no Group 1 storage tanks, as defined in § 63.2550 and specified in MON Table 4 Item 1.
VENTPE3-10	N/A	30 TAC Chapter 115, Vent Gas Controls	Jackson County is not a listed county in 30 TAC 115.122 control requirements for vent gas control. Jackson County is not subject to vent gas control requirements for VOC.
VNTPE3-11A	N/A	30 TAC Chapter 115, Vent Gas Controls	Jackson county is not a listed county in 30 TAC 115.122 control requirements for vent gas controls. Jackson county is not subject to vent gas controls requirements for VOC.
VNTPE3-11B	N/A	30 TAC Chapter 115, Vent Gas Controls	Jackson county is not a listed county in 30 TAC 115.122 control requirements for vent gas controls. Jackson county is not subject to vent gas controls requirements for VOC.

Commented [EQ7]: A few OP-REQ2 entries were not included. VNTHEX-02, VENTPE3-15. Please add these

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 36)
Federal Operating Permit Program
Table 13e: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart FFFF: National Emission Standards for Hazardous Air Pollutants:
Miscellaneous Organic Chemical Manufacturing - Continuous Process Vents
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
1/31/2025	O4166	RN100218973

Emission Point ID No.	SOP Index No.	Designated GRP1	Small Device	1257A1	1257A1 Device Type	1257A1 Device ID	Alt 63SS Mon Parameters	Alt 63SS Mon ID	CEMS	SS Device Type	SS Device ID
VNTHEX-02	63FFFF-2	YES	YES	NO			NO		NO	INCIN	HEX-02

From: Jasmine Yuan
Sent: Thursday, January 16, 2025 3:34 PM
To: eric.quiat@powereng.com
Cc: LeAnn M. Usoff/FTEHSF; sally.carroll@powereng.com
Subject: RE: Technical Review - O4166 Formosa Plastics Corporation, Texas (Significant, 36614)
Attachments: SOP - O4166 Formosa Plastics Corporation, Texas (Significant, 36614).docx

Hello
I updated the permit draft based on your inputs.
However,
1, UA15 in your attachment, page 36, Table 13e, code for 1257Al should be No, not NONE.
2, OP-REQ1 page 83, question XI.K1 should be answered Yes so that the PM term will be autogenerated.

I have conducted a technical review for this project. 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.

Please review the WDP and submit to me any comments you have on the working draft permit and above mentioned revised forms by *Due 01/31/2025 or sooner.*

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. 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.

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,
Jasmine Yuan

From: eric.quiat@powereng.com
Sent: Wednesday, January 8, 2025 2:30 PM
To: Jasmine Yuan
Cc: LeAnn M. Usoff/FTEHSF; sally.carroll@powereng.com
Subject: RE: Technical Review - O4166 Formosa Plastics Corporation, Texas (Significant, 36614)
Attachments: OP-UA15 1-7-25.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Jasmine,

In response to items 7 and 8 of your email request below please see responses added below each item in Green text with the relevant attachment included.

Regards,

ERIC QUIAT, P.E.
SR. PROJECT MANAGER

512-579-3823
512-496-7655 cell

POWER Engineers, Inc.
www.powereng.com [linkprotect.cudasvc.com]

[linkprotect.cudasvc.com]

From: Quiat, Eric
Sent: Thursday, December 19, 2024 12:24 PM
To: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>
Cc: Carroll, Sally <sally.carroll@powereng.com>; LeAnn M. Usoff/FTEHSF <LeAnnU@ftpc.fpcusa.com>
Subject: RE: Technical Review - O4166 Formosa Plastics Corporation, Texas (Significant, 36614)

Jasmine,

Thank you for the detailed reply and request below. We are starting to complete your request now but will need to coordinate with the correct people before we can approve final responses, including UA forms, to send to you. Several responses in Green are provided below on your items, so hopefully these are helpful.

With several folks out for the holidays we will likely be planning to get back to you after that time (early January) on any remaining responses. Please let us know if you have any questions.

ERIC QUIAT, P.E.
SR. PROJECT MANAGER

512-579-3823
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From: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>
Sent: Tuesday, December 17, 2024 1:56 PM
To: Quiat, Eric <eric.quiat@powereng.com>
Cc: LeAnn M. Usoff/FTEHSF <LeAnnU@ftpc.fpcusa.com>; Carroll, Sally <sally.carroll@powereng.com>
Subject: [EXTERNAL] RE: Technical Review - O4166 Formosa Plastics Corporation, Texas (Significant, 36614)

Sorry I did not make it clear in my last email.
Please respond to the following questions. I need your answers to decide how to enter the citations manually.
1, Unit PE3 Unit: You have existing index 63FFFF-1. But you have new index 63FFFF-5 in application. Which index number you want to use? Are the manual edits on based on the existing Index?

2, Unit PE3-13: Are you opting to comply with MACT H or MACT UU (these are two compliance options allowed by MACT FFFF)? The textual description and the table 6 citation will be different depending on which you choose.

FPC TX will be following MACT UU for equipment leak fugitives.

3, Units PE3-15: In current permit, you have index 63FFFF-4 under MACT CC regulation. I am going to add new index 63FFFF-1 for manual build though you provided index 63FFFF-4 on OP-REQ3.

The current SOP has index no. 63FFFF-1 for process vents controlled by a flare. Our OP-REQ3 provided in the permit application is consistent with the existing permit in that it uses this index no. for process vents controlled by flare.

Index no. 63FFFF-4 in our permit application is for the flare control device requirements themselves and should be assigned to the flare Unit IDs as shown in our OP-REQ3.

4, Unit PE3-BL: The citations requested for these bypass line requirements were approved since they are from the August 12, 2020 amendment that is not yet included in the DSS. However, these citations will not be listed on their own and the PE3-BL ID should not exist. Instead, these citations

should just go in row of any emission source whose CVS/CD has a bypass (for example, this is how we included MACT SS bypass citations that were previously

referenced). Please let me know which of the other unit IDs need these citations to be added. Depending on which units, these will either be part of that other unit's manual build, or part of the manual changes.

The closed vent systems are associated with the following vent streams routed to control devices: VENTPE3-10, VENTPE3-15, VNTPE3-11A, VNTPE3-11B, and VNTHEX-02. So, the Bypass line requirements can be added to these Unit IDs.

5, Unit PE3-MV: We have approved the citations requested for these maintenance vent requirements since they are from the August 12, 2020 amendment that is not yet included in the DSS. However, I am not sure about the vents. Is this intended to represent multiple maintenance vents or one. If one, then the row is ok as is. If multiple, please identify each one with a separate ID but you can then place the units in a group. Or alternatively, if these are representing multiple maintenance vents and they are too numerous to separately identify, you could also choose to just add these citations to the general process unit PE3 UNIT instead of having a separate row.

This unit ID was intended to cover the myriad of numerous maintenance vents. These citations can be added to Unit ID for the process: PE3 UNIT as you proposed.

6, Unit PE3-PRD: The pressure relief devices are just one of the many fugitive components. Rather than this separate ID, these citations should just be added to the manual build for the fugitive unit PE3-13, replacing the high-level requirements. Do you really wants to have an entirely separate fugitive unit for just these pressure relief devices?

These requirements can go under the PE3-13 grouping for relief devices as you described.

7, Unit VENTPE3-15: Please provide NSPS DDD attributes on UA-28 and MACT FFFF on UA 15. The manual build/change will be done on those forms.

An OP-UA15 form is provided with tables populated for MACT FFFF. Please note that the OP-UA28 form only addresses applicable NSPS DDD control requirements and would produce a list of detailed NSPS DDD citations that in fact, do not apply. We experienced this issue during the original O4166 permit application and technical review. So, an OP-UA28 form for NSPS DDD is not being provided and we would like the same MON MACT overlap language listed that is in the current SOP 60DDD-1 index numbers in the current SOP.

8, Unit VNTHEX-02: please provide UA15 for MACT FFFF, and NSPS DDD on UA28. I will make changes on it.

An OP-UA15 form is provided with tables populated for MACT FFFF. Please note that the OP-UA28 form only addresses applicable NSPS DDD control requirements and would produce a list of detailed NSPS DDD citations that in fact, do not apply. We experienced this issue during the original O4166 permit application and technical review. So, an OP-UA28 form for NSPS DDD is not being provided and we would like the same MON MACT overlap language listed that is in the current SOP 60DDD-1 index numbers in the current SOP.

Please respond by this Friday and I will try to send you the working draft before Christmas.

Thank you!
Jasmine

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 32)
Federal Operating Permit Program
Table 13a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart FFFF: National Emission Standards for Hazardous Air Pollutants:
Miscellaneous Organic Chemical Manufacturing - Continuous Process Vents
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
1/7/2025	O4166	RN100218973

Emission Point ID No.	SOP Index No.	Emission Standard	Comb Device	95% Scrubber	PERF Test	Negative Pressure	Bypass Line
VENTPE3-15	63FFFF-1	BLWFLR					
VNTHEX-02	63FFFF-2	CDPMV					

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 35)
Federal Operating Permit Program
Table 13d: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart FFFF: National Emission Standards for Hazardous Air Pollutants:
Miscellaneous Organic Chemical Manufacturing - Continuous Process Vents
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
1/7/2025	O4166	RN100218973

Emission Point ID No.	SOP Index No.	Designated GRP1	Designated HAL	Determined HAL	Prior Eval	Assessment Waiver	Assessment Waiver ID	Negative Pressure	Bypass Line
VENTPE3-15	63FFFF-1	YES	NO	NO	NO	NO		NO	NONE

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 36)
Federal Operating Permit Program
Table 13e: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart FFFF: National Emission Standards for Hazardous Air Pollutants:
Miscellaneous Organic Chemical Manufacturing - Continuous Process Vents
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
1/7/2025	O4166	RN100218973

Emission Point ID No.	SOP Index No.	Designated GRP1	Small Device	1257A1	1257A1 Device Type	1257A1 Device ID	Alt 63SS Mon Parameters	Alt 63SS Mon ID	CEMS	SS Device Type	SS Device ID
VNTHEX-02	63FFFF-2	YES	YES	NONE			NO		NO	INCIN	HEX-02

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 37)
Federal Operating Permit Program
Table 13f: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart FFFF: National Emission Standards for Hazardous Air Pollutants:
Miscellaneous Organic Chemical Manufacturing - Continuous Process Vents
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
1/7/2025	O4166	RN100218973

Emission Point ID No.	SOP Index No.	Meets 63.988(b)(2)	Water	Designated HAL	Determined HAL
VNTHEX-02	63FFFF-2	NO		NO	NO

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 38)
Federal Operating Permit Program
Table 13g: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart FFFF: National Emission Standards for Hazardous Air Pollutants:
Miscellaneous Organic Chemical Manufacturing - Continuous Process Vents
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
1/7/2025	O4166	RN100218973

Emission Point ID No.	SOP Index No.	HAL Device Type	HAL Device ID	Prior Eval	Assessment Waiver	Assessment Waiver ID	Formaldehyde	Negative Pressure	Bypass Line
VNTHEX-02	63FFFF-2	NONE		NO	NO		NO	NO	NONE

From: eric.quiat@powereng.com
Sent: Wednesday, July 31, 2024 11:49 AM
To: Jasmine Yuan
Cc: LeAnn M. Usoff/FTEHSF; sally.carroll@powereng.com
Subject: RE: Technical Review - O4166 Formosa Plastics Corporation, Texas (Significant, 36614)
Attachments: OP-2 7-19-24.docx; OP-SUMR 7-19-24.docx; OP-UA15 7-19-24.docx; OP-MON 7-19-24.docx; Major NSR Summary Table Permit 127838 7-19-24.docx; OP-REQ3.xlsx

Jasmine,

Below please find responses to each of your items in green text. Associated attachments are provided to this email response.

Thank you!

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From: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>
Sent: Wednesday, July 17, 2024 11:11 AM
To: Quiat, Eric <eric.quiat@powereng.com>
Cc: Carroll, Sally <sally.carroll@powereng.com>; LeAnn M. Usoff/FTEHSF <LeAnnU@ftpc.fpcusa.com>
Subject: [EXTERNAL] RE: Technical Review - O4166 Formosa Plastics Corporation, Texas (Significant, 36614)

Hi Eric,
I got lost when I was checking your OP-REQ3. Can you please send me the word document of OP-REQ3 (it is better to have MRRT on the same page with related standards)?

FPC TX response: Attached please find the native XLS file of OP-REQ3. The detailed nature of the regulatory citations being added necessitated an XLS format rather than a Word document.

I tried to figure out which are new requested manual builds, which are existing manual build updates. Some unit have new Index of MACT FFFF, in addition of current index number 63FFFF-1. I would appreciate your clarification on this MACT FFFF manual build requests.

FPC TX response: Items on the OP-REQ3 form are manual entries from our understanding as these specific regulatory citations are not yet available in TCEQ's UA forms and supporting RRTs.

For NSPS DDD, will you be able to use UA28 to add NSPS DDD, then we can do manual edits on top of it? or do you prefer to use UA1 for NSPS DDD requirements?

FPC TX response: The OP-UA28 form does not have an option to indicate that MON MACT (63FFFF) Group 1 requirements are followed instead of NSPS DDD, so the OP-UA28 form cannot be used for the overlap provision. We understand the OP-REQ3 is the form to list these specific requirements (overlap provision). This is how the NSPS DDD requirements in the existing SOP were developed.

Below are the deficiency items I found during the review

1. Four permit shields for 30 TAC Chapter 115, Vent Gas for units PE3-15, VENTPE3-15, VNTHEX-02, and VENTPE3-10 were requested based on being located in Jackson County. We are aiming to streamline our permit shield review and focus on rules that are truly potentially applicable, and so since changing location is not an operational parameter that the applicant could vary for their units, location-based shields are unnecessary. Please consider not to have it in permit. For the existing permit shields based on location, we'd like to remove these either this project or next renewal.

   FPC TX response: FPC TX would like to keep these permit shields in this permit. While we understand TCEQ's reasoning, the FPC TX Point Comfort complex spans both Calhoun and Jackson counties, so for some process units and Title V permits located in Calhoun County, there are applicable Chapter 115 requirements. FPC TX would like to make it clear for units that are not located in Calhoun county (i.e., those in Jackson County) that these Chapter 115 requirements do not apply.

   Because of the Point Comfort Complex's unique scenario of being in both counties, we would like to keep these location-based permit shields.

2. The units PE3-15 and PE3-10 on UA7 for MACT CC use index number 63FFFF-4 instead of 63CC. Is this a mistake or intentional decision?

   FPC TX response: MACT CC is not applicable, only the specific flare requirements of MACT CC apply as referenced by the Applicable MON MACT (63FFFF) regulation. Therefore, listing the SOP index no. for the applicable 63FFFF regulation is correct.

3. Why does the Major NSR Summary Table have issuance date 05/03/2024. It does not match OP-REQ1 page 87. If that is the recent authorization, please send me the permit face, MRT, CND. I cannot find it in our system.

   FPC TX response: the issuance date should be 9/22/2023. A revised Major NSR summary table with the corrected date is attached.

4. Please revise this name to cut 6 characters. It is too long to fit our system. The name/description has maximum 50 characters limit.

A	11	PE3-SVD	OP-REQ2	Storage Vessel Degassing (SVD) Requirements Post MON RTR		127838	PSDTX1588M1
	12	VENTPE3-10	OP-REQ3	Vent to Flare		127838	PSDTX1588M1

FPC TX response: A revised OP-SUMR form is attached with changes to the PE3-SVD name/description field to be less than 50 characters.

In addition, FPC TX would like to add periodic monitoring for the cooling tower for Chapter 111 visible emission requirements consistent with other SOPs that FPC TX has (with cooling towers) at its Point Comfort Complex. An OP-MON, OP-UA15 and updated OP-2 form requesting the periodic monitoring addition are also attached with this update.

My next step is to sort out all manual build/edits and send them to our technical specialist Ms. Carolyn Maus to review.
It usually takes her a month to approve or give comments. Then I will pass her comments to you and see if you agree or not.

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.

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 [tceq.texas.gov].

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 [tceq.texas.gov]. 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.
Jasmine Yuan

From: eric.quiat@powereng.com <eric.quiat@powereng.com>
Sent: Wednesday, July 17, 2024 9:17 AM
To: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>
Cc: sally.carroll@powereng.com; LeAnn M. Usoff/FTEHSF <LeAnnU@ftpc.fpcusa.com>
Subject: RE: FPC TX permit O4166

Jasmine,

Good morning. Can you provide an update on the status of the significant revision application (tceq project 36614) review?

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PROJECT MANAGER

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From: Quiat, Eric
Sent: Monday, June 17, 2024 9:19 AM
To: Jasmine.Yuan@tceq.texas.gov
Cc: LeAnn M. Usoff/FTEHSF <LeAnnU@ftpc.fpcusa.com>; Carroll, Sally <sally.carroll@powereng.com>
Subject: FPC TX permit O4166

Jasmine,

Thanks for speaking to me last week. At this time the renewal will be kept separate from the significant revision project you are working (i.e., a separate renewal application will be submitted). I just wanted to give you a brief update to let you know so this will not affect your review.

Thank you,

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Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 1)
Federal Operating Permit Program
Table 1a: Title 30 Texas Administrative Code Chapter 111 (30 TAC Chapter 111)
Subchapter A: Visible Emissions
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
07/19/2024	O4166	RN100218973

Emission Point ID No.	SOP/GOP Index No.	Alternate Opacity Limitation	AOL ID No.	Vent Source	Opacity Monitoring System	Construction Date	Effluent Flow Rate
PE3-12	R1111-2	NO		OTHER	NONE	72+	100+

Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR
Table 1

Date	Permit No.	Regulated Entity No.
07/19/2024	O4166	RN100218973

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
	1	PE3-13	OP-REQ3	Fugitives		127838	PSDTX1588M1
A	2	PE3-15	OP-UA7	Enclosed Ground Flare		127838	PSDTX1588M1
A	3	VENTPE3-15	OP-REQ3	Vent to Enclosed Ground Flare		127838	PSDTX1588M1
A	4	VNTHEX-02	OP-REQ3	Vent to Hexene Plant Thermal Oxidizer		127838	PSDTX1588M1
	5	PE3-12	~~OP-SUMR~~OP-MON OP-UA15	Cooling Tower		127838	PSDTX1588M1
	6	PE3-10	OP-UA7	Flare		127838	PSDTX1588M1
	7	PE3 UNIT	OP-REQ3	MCPU PE3 Process		127838	PSDTX1588M1
A	8	PE3-PRD	OP-REQ3	Pressure Relief Device (PRD) Requirements Post MON RTR		127838	PSDTX1588M1
A	9	PE3-MV	OP-REQ3	Maintenance Vent (MV) Requirements Post MON RTR		127838	PSDTX1588M1

Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR
Table 1

Date	Permit No.	Regulated Entity No.
07/19/2024	O4166	RN100218973

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
A	10	PE3-BL	OP-REQ3	Bypass Line (BL) Requirements Post MON RTR		127838	PSDTX1588M1
A	11	PE3-SVD	OP-REQ2	Storage Vessel Degassing (SVD) Requirements		127838	PSDTX1588M1
	12	VENTPE3-10	OP-REQ3	Vent to Flare		127838	PSDTX1588M1
	13	PE3 HTXCHG	OP-REQ2	Heat Exchange Systems (Cooling Water System)		127838	PSDTX1588M1

Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program

Table 1a: Additions

Date: 5/3/2024	**Regulated Entity No.:** RN100218973	**Permit No.:** O4166
Company Name: Formosa Plastics Corporation, Texas	**Area Name:** PE3 Plant	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
1	PE3-13	OP-REQ3	63FFFF-3	HAPS	MACT FFFF	§63.2480(a) §63.2480(b) MON Table 6
2	PE3-15	OP-UA7	R1111-1	PM (Opacity)	Chapter 111	§111.111(a)(4)(A)|1
2	PE3-15	OP-UA7	60A-1	PM (Opacity)	NSPS A	§60.18(b) §60.18(c)(1) §60.18(c)(2) §60.18(c)(3)(ii) §60.18(c)(4)(iii) §60.18(c)(6) §60.18(e)
2	PE3-15	OP-UA7	63A-1	PM (Opacity)	MACT A	§63.11(b)(4) §63.11(b)(1) §63.11(b)(2) §63.11(b)(3) §63.11(b)(5) §63.11(b)(6)(ii) §63.11(b)(7)(iii)
2	PE3-15	OP-UA7	63FFFF-4	HAPS	MACT FFFF	[G]§63.2450(e)(5) [G]§63.2450(k) [G]§63.670
3	VENTPE3-15	OP-REQ3	60DDD-1	VOC/TOC	NSPS DDD	See 40 CFR 63 FFFF requirements.

Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program

Table 1a: Additions

Date:	5/3/2024	**Regulated Entity No.:**	RN100218973	**Permit No.:**	O4166
Company Name:	Formosa Plastics Corporation, Texas	**Area Name:**	PE3 Plant		

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
3	VENTPE3-15	OP-REQ3	63FFFF-1	HAPS	MACT FFFF	§63.2455(a)-Table 1.1.a.ii §63.11(b) §63.2450(b) §63.2455(a) §63.2455(b) §63.2455(b)(1) §63.982(b) §63.983(a)(1) §63.983(a)(2)
3	VENTPE3-15	OP-REQ3	63FFFF-1 (Continued)	HAPS	MACT FFFF	§63.983(d)(1) §63.983(d)(1)(i) [G]§63.983(d)(2) §63.983(d)(3) §63.987(a) §63.987(b)(1) §63.987(b)(3) [G]§63.997(c)(1) §63.997(c)(3) [G]§63.2450(e)(5) [G]§63.2450(k) [G]§63.670
3	VENTPE3-15	OP-REQ3	63FFFF-1	VOC/TOC	MACT FFFF	§63.2535(h)
4	VNTHEX-02	OP-REQ3	60DDD-1	VOC/TOC	NSPS DDD	See 40 CFR 63 FFFF requirements.

Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program

Table 1a: Additions

Date:	5/3/2024	**Regulated Entity No.:**	RN100218973	**Permit No.:**	O4166
Company Name:	Formosa Plastics Corporation, Texas	**Area Name:**	PE3 Plant		

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
4	VNTHEX-02	OP-REQ3	63FFFF-2	HAPS	MACT FFFF	§63.2455(a)-Table 1.1.a.i §63.2450(b) §63.2450(i)(1) §63.2450(i)(2) §63.2455(a) §63.2455(b) §63.2455(b)(1) §63.982(c) §63.982(c)(2)
4	VNTHEX-02	OP-REQ3	63FFFF-2 (Continued)	HAPS	MACT FFFF	§63.983(a)(1) §63.983(a)(2) §63.983(d)(1) §63.983(d)(1)(i) [G]§63.983(d)(2) §63.983(d)(3) §63.988(a)(1) §63.988(a)(2) §63.996(c)(1)
4	VNTHEX-02	OP-REQ3	63FFFF-2 (Continued)	HAPS	MACT FFFF	§63.996(c)(2) §63.996(c)(2)(i) §63.996(c)(3) §63.996(c)(4) §63.996(c)(5) §63.996(c)(6) [G]§63.997(c)(1) §63.997(c)(3) [G]§63.997(d)

Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program

Table 1a: Additions

Date:	5/3/2024	**Regulated Entity No.:**	RN100218973	**Permit No.:**	O4166
Company Name:	Formosa Plastics Corporation, Texas	**Area Name:**	PE3 Plant		

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
4	VNTHEX-02	OP-REQ3	63FFFF-2	VOC/TOC	MACT FFFF	§63.2535(h)
6	PE3-10	OP-UA7	60A-1	PM (Opacity)	NSPS A	§60.18(b) §60.18(c)(1) §60.18(c)(2) §60.18(c)(3)(ii) §60.18(c)(4)(iii) §60.18(c)(6) §60.18(e)
6	PE3-10	OP-UA7	63A-1	PM (Opacity)	MACT A	§63.11(b)(4) §63.11(b)(1) §63.11(b)(2) §63.11(b)(3) §63.11(b)(5) §63.11(b)(6)(ii) §63.11(b)(7)(iii)
6	PE3-10	OP-UA7	63FFFF-4	HAPS	MACT FFFF	[G]§63.2450(e)(5) [G]§63.2450(k) [G]§63.670 As per AMOC No. 224 issued by TCEQ on July 13, 2023, the effective date for SOP Index No. 63FFFF-5 requirements is August 12, 2024.
7	PE3 UNIT	OP-REQ3	63FFFF-5	HAPS	MACT FFFF	§63.2440(a) §63.2450(a)(2) and MON Tables 1 and 6 §64.2450(c)(2) §63.2450(e)(4) §63.2450(h) §63.2450(l) §63.2450(r) §63.2450(u) §63.2455(a) and MON Table 1 §63.2480(a) and MON Table 6

Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program

Table 1a: Additions

Date: 5/3/2024	**Regulated Entity No.:** RN100218973	**Permit No.:** O4166
Company Name: Formosa Plastics Corporation, Texas	**Area Name:** PE3 Plant	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
8	PE3-PRD	OP-REQ3	63FFFF-8	HAPS	MACT FFFF	§63.2480(e)(4)(i) §63.2480(e)(4)(ii)
9	PE3-MV	OP-REQ3	63FFFF-6	HAPS	MACT FFFF	[G]§63.2450(v)
10	PE3-BL	OP-REQ3	63FFFF-7	HAPS	MACT FFFF	§63.2450(e)(6)
12	VENTPE3-10	OP-REQ3	63FFFF-1	HAPS	MACT FFFF	§63.2455(a)-Table 1.1.a.ii §63.11(b) §63.2450(b) §63.2455(a) §63.2455(b) §63.2455(b)(1) §63.982(b) §63.983(a)(1) §63.983(a)(2)
12	VENTPE3-10	OP-REQ3	63FFFF-1 (Continued)	HAPS	MACT FFFF	§63.983(d)(1) §63.983(d)(1)(i) [G]§63.983(d)(2) §63.983(d)(3) §63.987(a) §63.987(b)(1) §63.987(b)(3) [G]§63.997(c)(1) §63.997(c)(3) [G]§63.2450(e)(5) [G]§63.2450(k) [G]§63.670

Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program

Table 1b: Additions

Date:	5/3/2024	**Regulated Entity No.:**	RN100218973	**Permit No.:**	O4166
Company Name:	Formosa Plastics Corporation, Texas	**Area Name:**	PE3 Plant		

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
1	PE3-13	63FFFF-3	HAPS	§63.2480(a) §63.2480(b) MON Table 6	§63.2525(a) MON Table 6	§63.2520(a) MON Table 11 §63.2520(e)
2	PE3-15	R1111-1	PM (Opacity)	§111.111(a)(4)(A)(i) §111.111(a)(4)(A)(ii)	§111.111(a)(4)(A)(ii)	None
2	PE3-15	60A-1	PM (Opacity)	§60.18(d) §60.18(f)(1) §60.18(f)(2) §60.18(f)(3) §60.18(f)(4) §60.18(f)(5)	None	None
2	PE3-15	63A-1	PM (Opacity)	§63.11(b)(4) §63.11(b)(5) §63.11(b)(7)(i)	None	None
2	PE3-15	63FFFF-4	HAPS	[G]§63.2450(e)(5) §63.2450(k)(8) [G]§63.670 [G]§63.671	§63.2450(e)(5)(xii) §63.2450(k)(7) [G]§63.2525(m) §63.670(o)(6) §63.670(p)	§63.2450(e)(5)(iv) and (xi) §63.2520(d)(3) [G]§63.2520(e)(11) §63.670(q) MON Table 11
3	VENTPE3-15	60DDD-1	VOC/TOC	See 40 CFR 63 FFFF requirements.	See 40 CFR 63 FFFF requirements.	See 40 CFR 63 FFFF requirements.

Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program

Table 1b: Additions

Date:	5/3/2024	**Regulated Entity No.:**	RN100218973	**Permit No.:**	O4166
Company Name:	Formosa Plastics Corporation, Texas	**Area Name:**	PE3 Plant		

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
3	VENTPE3-15	63FFFF-1	HAPS	[G]§63.115(d)(2)(v) §63.115(d)(3)(iii) §63.983(b) [G]§63.983(b)(1) [G]§63.983(b)(2) [G]§63.983(b)(3) [G]§63.983(c)(1) §63.983(c)(2) §63.983(c)(3) §63.983(d)(1) §63.983(d)(1)(ii)	§63.2450(f)(2) §63.2450(f)(2)(i) §63.2450(f)(2)(ii) §63.983(b) [G]§63.983(d)(2) §63.987(b)(1) §63.987(c) §63.998(a)(1) [G]§63.998(a)(1)(i) §63.998(a)(1)(ii)	§63.2450(f)(2)(ii) §63.2450(q) §63.987(b)(1) §63.997(c)(3) §63.998(a)(1)(iii)(A) [G]§63.998(b)(3) [G]§63.999(a)(1) [G]§63.999(a)(2) §63.999(b)(5)
3	VENTPE3-15	63FFFF-1 (Continued)	HAPS	[G]§63.987(b)(3)(i) §63.987(b)(3)(ii) §63.987(b)(3)(iii) §63.987(b)(3)(iv) §63.987(c) §63.997(a) [G]§63.997(c)(1) §63.997(c)(2) §63.997(c)(3) §63.997(c)(3)(i) §63.997(c)(3)(ii) [G]§63.2450(e)(5) §63.2450(k)(8) [G]§63.670 [G]§63.671	§63.998(a)(1)(iii)(A) §63.998(a)(1)(iii)(B) [G]§63.998(b)(1) [G]§63.998(b)(2) [G]§63.998(b)(3) [G]§63.998(b)(5) [G]§63.998(d)(1) §63.998(d)(3)(i) §63.998(d)(3)(ii) §63.998(d)(5) §63.2450(e)(5)(xii) §63.2450(k)(7) [G]§63.2525(m) §63.670(o)(6) §63.670(p)	§63.999(c)(1) §63.999(c)(2)(i) §63.999(c)(3) §63.999(c)(6) [G]§63.999(c)(6)(i) §63.999(c)(6)(iv) [G]§63.999(d)(1) [G]§63.999(d)(2) §63.2450(e)(5)(iv) and (xi) §63.2520(d)(3) [G]§63.2520(e)(11) §63.670(q) MON Table 11
3	VENTPE3-15	63FFFF-1	VOC/TOC	§63.2535(h)	§63.2535(h)	§63.2535(h)
4	VNTHEX-02	60DDD-1	VOC/TOC	See 40 CFR 63 FFFF requirements.	See 40 CFR 63 FFFF requirements.	See 40 CFR 63 FFFF requirements.

Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program

Table 1b: Additions

Date:	5/3/2024	**Regulated Entity No.:**	RN100218973	**Permit No.:**	O4166
Company Name:	Formosa Plastics Corporation, Texas	**Area Name:**	PE3 Plant		

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
4	VNTHEX-02	63FFFF-2	HAPS	[G]§63.115(d)(2)(v) §63.115(d)(3)(iii) §63.2450(g) §63.2450(g)(1) §63.2450(g)(2) [G]§63.2450(g)(3) §63.2450(g)(4) §63.2450(k)(6) §63.983(b) [G]§63.983(b)(1) [G]§63.983(b)(2) [G]§63.983(b)(3) [G]§63.983(c)(1) §63.983(c)(2)	§63.2450(k)(6) §63.2525(g) §63.2525(h) §63.983(b) [G]§63.983(d)(2) §63.988(b)(1) §63.996(c)(2)(ii) §63.998(a)(2)(i)	§63.2450(q) §63.988(b)(1) §63.996(b)(2) §63.996(c)(6) §63.997(c)(3) §63.998(a)(2)(ii)(A)
4	VNTHEX-02	63FFFF-2 (Continued)	HAPS	§63.983(c)(3) §63.983(d)(1) §63.983(d)(1)(ii) §63.988(b)(1) §63.988(c)(1) §63.996(b)(1) §63.996(b)(1)(i) §63.996(b)(2) §63.997(a) [G]§63.997(c)(1) §63.997(c)(2) §63.997(c)(3) §63.997(c)(3)(iii) [G]§63.997(d)	§63.998(a)(2)(ii)(A) §63.998(a)(2)(ii)(B)(1) §63.998(a)(2)(ii)(B)(4) [G]§63.998(b)(1) [G]§63.998(b)(2) [G]§63.998(b)(3) [G]§63.998(b)(5)	[G]§63.998(b)(3) [G]§63.999(a)(1) [G]§63.999(a)(2) [G]§63.999(b)(3) §63.999(b)(5)
4	VNTHEX-02	63FFFF-2 (Continued)	HAPS	§63.997(e) §63.997(e)(1)(i) [G]§63.997(e)(1)(iv) [G]§63.997(e)(1)(v) §63.997(e)(2) §63.997(e)(2)(i) §63.997(e)(2)(i)(B) §63.997(e)(2)(ii) §63.997(e)(2)(iii) §63.997(e)(2)(iii)(A) [G]§63.997(e)(2)(iii)(B) [G]§63.997(e)(2)(iii)(C) [G]§63.997(e)(2)(iii)(D) [G]§63.997(e)(2)(iii)(E)	[G]§63.998(c)(1) §63.998(c)(2)(iii) §63.998(c)(3)(iii) [G]§63.998(d)(1) §63.998(d)(3)(i) §63.998(d)(3)(ii) §63.998(d)(5)	§63.999(c)(1) §63.999(c)(2)(i) §63.999(c)(6) [G]§63.999(c)(6)(i) §63.999(c)(6)(iv) MON Table 11

Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program

Table 1b: Additions

Date:	5/3/2024	**Regulated Entity No.:**	RN100218973	**Permit No.:**	O4166
Company Name:	Formosa Plastics Corporation, Texas	**Area Name:**	PE3 Plant		

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
4	VNTHEX-02	63FFFF-2	VOC/TOC	§63.2535(h)	§63.2535(h)	§63.2535(h)
6	PE3-10	60A-1	PM (Opacity)	§60.18(d) §60.18(f)(1) §60.18(f)(2) §60.18(f)(3) §60.18(f)(4) §60.18(f)(5)	None	None
6	PE3-10	63A-1	PM (Opacity)	§63.11(b)(4) §63.11(b)(5) §63.11(b)(7)(i)	None	None
6	PE3-10	63FFFF-4	HAPS	[G]§63.2450(e)(5) §63.2450(k)(8) [G]§63.670 [G]§63.671 As per AMOC No. 224 issued by TCEQ on July 13, 2023, the effective date for SOP Index No. 63FFFF-5 requirements is August 12, 2024.	§63.2450(e)(5)(xii) §63.2450(k)(7) [G]§63.2525(m) §63.670(o)(6) §63.670(p) As per AMOC No. 224 issued by TCEQ on July 13, 2023, the effective date for SOP Index No. 63FFFF-5 requirements is August 12, 2024.	§63.2450(e)(5)(iv) and (xi) §63.2520(d)(3) [G]§63.2520(e)(11) §63.670(q) MON Table 11 As per AMOC No. 224 issued by TCEQ on July 13, 2023, the effective date for SOP Index No. 63FFFF-5 requirements is August 12, 2024.
7	PE3 UNIT	63FFFF-5	HAPS	§63.2450(g)(6) §63.2450(g)(7) §63.2450(i)(3) §63.2450(j)(5)(ii)	[G]§63.2450(j)(6) §63.2485(o) §63.2525(a) [G]§63.2525(b) §63.2525(j) [G]§63.2525(l) [G]§63.2525(m) §63.2525(n)	§63.2445(c) §63.2450(g)(5) [G]§63.2450(m) §63.2515(a) §63.2515(b)(2) §63.2515(c) §63.2520(a) §63.2520(b)(3) §63.2520(b)(4) [G]§63.2520(c) §63.2520(d)(2)(ii) [G]§63.2520(d)(5) [G]§63.2520(e) §63.2520(f) §63.2520(g) §63.2520(h) §63.2520(i) MON Table 11

Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program

Table 1b: Additions

Date:	5/3/2024	**Regulated Entity No.:**	RN100218973	**Permit No.:**	O4166
Company Name:	Formosa Plastics Corporation, Texas	**Area Name:**	PE3 Plant		

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
8	PE3-PRD	63FFFF-8	HAPS			
9	PE3-MV	63FFFF-6	HAPS	[G]§63.2450(v)	[G]§63.2525(p)	[G]§63.2520(e)(14) MON Table 11
10	PE3-BL	63FFFF-7	HAPS	§63.2450(e)(6)	§63.2525(n)	§63.2520(e)(12) MON Table 11
12	VENTPE3-10	63FFFF-1	HAPS	[G]§63.115(d)(2)(v) §63.115(d)(3)(iii) §63.983(b) [G]§63.983(b)(1) [G]§63.983(b)(2) [G]§63.983(b)(3) [G]§63.983(c)(1) §63.983(c)(2) §63.983(c)(3) §63.983(d)(1) §63.983(d)(1)(ii)	§63.2450(f)(2) §63.2450(f)(2)(i) §63.2450(f)(2)(ii) §63.983(b) [G]§63.983(d)(2) §63.987(b)(1) §63.987(c) §63.998(a)(1) [G]§63.998(a)(1)(i) §63.998(a)(1)(ii)	§63.2450(f)(2)(ii) §63.2450(q) §63.987(b)(1) §63.997(c)(3) §63.998(a)(1)(iii)(A) [G]§63.998(b)(3) [G]§63.999(a)(1) [G]§63.999(a)(2) §63.999(b)(5)
12	VENTPE3-10	63FFFF-1 (Continued)	HAPS	[G]§63.987(b)(3)(i) §63.987(b)(3)(ii) §63.987(b)(3)(iii) §63.987(b)(3)(iv) §63.987(c) §63.997(a) [G]§63.997(c)(1) §63.997(c)(2) §63.997(c)(3) §63.997(c)(3)(i) §63.997(c)(3)(ii) [G]§63.2450(e)(5) §63.2450(k)(8) [G]§63.670 [G]§63.671	§63.998(a)(1)(iii)(A) §63.998(a)(1)(iii)(B) [G]§63.998(b)(1) [G]§63.998(b)(2) [G]§63.998(b)(3) [G]§63.998(b)(5) [G]§63.998(d)(1) §63.998(d)(3)(i) §63.998(d)(3)(ii) §63.998(d)(5) §63.2450(e)(5)(xii) §63.2450(k)(7) [G]§63.2525(m) §63.670(o)(6) §63.670(p)	§63.999(c)(1) §63.999(c)(2)(i) §63.999(c)(3) §63.999(c)(6) [G]§63.999(c)(6)(i) §63.999(c)(6)(iv) [G]§63.999(d)(1) [G]§63.999(d)(2) §63.2450(e)(5)(iv) and (xi) §63.2520(d)(3) [G]§63.2520(e)(11) §63.670(q) MON Table 11

Texas Commission on Environmental Quality
Monitoring Requirements
Form OP-MON (Page 3)
Federal Operating Permit Program
Table 1c: CAM/PM Case-By-Case Additions

I. Identifying Information		
Account No.: CB-0038-Q	RN No.: RN100218973	CN: CN600130017
Permit No: O4166	Project No.: 36614	
Area Name: PE3 Plant		
Company Name: Formosa Plastics Corporation, Texas		
II. Unit/Emission Point/Group/Process Information		
Revision No.: 5		
Unit/EPN/Group/Process ID No.: PE3-12		
Applicable Form: OP-UA15		
III. Applicable Regulatory Requirement		
Name: Chapter 111		
SOP/GOP Index No.: R1111-2		
Pollutant: PM (Opacity)		
Main Standard: §111.111(a)(1)(C)		
Monitoring Type: PM		
Unit Size:		
Deviation Limit: Opacity shall not exceed 15% averaged over a six-minute period for any source having a total flow rate greater than or equal to 100,000 acfm.		
IV. Control Device Information		
Control Device ID No.:		
Device Type:		
V. CAM Case-by-case		
Indicator:		
Minimum Frequency:		
Averaging Period:		
QA/QC Procedures:		
Verification Procedures:		
Representative Date:		
VI. Periodic Monitoring Case-by-case		
Indicator: Visible Emissions	Minimum Frequency: Annual	
Averaging Period: n/a		

I. Identifying Information

Periodic Monitoring Text:

Visible emissions observations shall be made and recorded. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 miles, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor.

If visible emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If the result of the Test Method 9 is opacity above the opacity limit in the applicable requirement, the permit holder shall report a deviation.

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

Date: 07/19/2024	
Permit No.: O4166	
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?	☒ 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	☒ YES ☐ NO
For GOP Revisions Only	☐ YES ☐ NO

III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)						
Indicate all pollutants for which the site is a major source based on the site's potential to emit: *(Check the appropriate box[es].)*						
☒ VOC	☒ NO_X	☒ SO_2	☒ PM_{10}	☒ CO	☐ Pb	☒ HAP
Other: GHGs						
IV. Reference Only Requirements *(For reference only)*						
Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)?					☒ YES ☐ NO ☐ N/A	
V. Delinquent Fees and Penalties						
Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.						

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

Date: 07/19/2024
Permit No.: O4166
Regulated Entity No.: RN100218973
Company Name: Formosa Plastics Corporation, Texas

Using the table below, provide a description of the revision.

Revision No.	Revision Code	Unit/Group		Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
1	SIG-D	NO	PE3-13	OP-REQ3	127838, PSDTX1588M1	Revise fugitive component counts (and emissions) for new piping. Some components subject to NSPS Subpart DDD and MON MACT Subpart FFFF.
2	SIG-D	YES	PE3-15	OP-UA7	127838, PSDTX1588M1	New unassisted enclosed ground flare (EGF) to control PE3 plant waste gas. EGF is subject to 30 TAC Chapter 111, NSPS Subpart A, and MACT Subparts A and FFFF.
3	SIG-D	YES	VENTPE3-15	OP-REQ3	127838, PSDTX1588M1	PE3 vent stream authorized for control by PE3-15 EGF, subject to NSPS Subpart DDD and MON MACT Subpart FFFF.

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

Date: 07/19/2024
Permit No.: O4166
Regulated Entity No.: RN100218973
Company Name: Formosa Plastics Corporation, Texas

Using the table below, provide a description of the revision.

Revision No.	Revision Code		Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
4	SIG-D	YES	VNTHEX-02	OP-REQ3	127838, PSDTX1588M1	PE3 vent stream authorized for control by HEX-02 thermal oxidizer located at Hexene Plant. Vent stream is subject to NSPS Subpart DDD and MON MACT Subpart FFFF.
5	SIG-D	NO	PE3-12	OP-MON OP-UA15	127838, PSDTX1588M1	Addition of one new cell to PE3 cooling tower, increasing emissions of PM, PM10, and VOC. Add periodic monitoring.
6	SIG-D	NO	PE3-10	OP-UA7	127838, PSDTX1588M1	Address new MON MACT Requirements in Subpart FFFF for PE3 elevated flare. Update citations for NSPS Subpart A and MACT Subpart A.
7	SIG-D	NO	PE3 UNIT	OP-REQ3	127838, PSDTX1588M1	Address new MON MACT Requirements in Subpart FFFF for PE3 CMPU.
8	SIG-D	YES	PE3-PRD	OP-REQ3	127838, PSDTX1588M1	Address pressure relief device MON MACT Subpart FFFF requirements for pressure relief devices routed to control device or process.

Form OP-2-Table 2
Texas Commission on Environmental Quality

Date: 07/19/2024
Permit No.: O4166
Regulated Entity No.: RN100218973
Company Name: Formosa Plastics Corporation, Texas

Using the table below, provide a description of the revision.

Revision No.	Revision Code	Unit/Group		Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
9	SIG-D	YES	PE3-MV	OP-REQ3	127838, PSDTX1588M1	Address maintenance vent MON MACT Subpart FFFF requirements.
10	SIG-D	YES	PE3-BL	OP-REQ3	127838, PSDTX1588M1	Address bypass line MON MACT Subpart FFFF requirements.
11	SIG-D	YES	PE3-SVD	OP-REQ2	127838, PSDTX1588M1	Address storage vessel degassing MON MACT Subpart FFFF permit shield.
12	SIG-D	NO	VENTPE3-10	OP-REQ3	127838, PSDTX1588M1	Update MON MACT Subpart FFFF citations, and add permit shield for Chapter 115, Vent Gas Control.
13	SIG-D	NO	PE3 HTXCHG	OP-REQ2	127838, PSDTX1588M1	Update permit shield for Post-MON RTR (MACT Subpart FFFF) changes.

Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 3
Texas Commission on Environmental Quality

Date: 07/19/2024		
Permit No.: O4166		
Regulated Entity No.: RN100218973		
Company Name: Formosa Plastics Corporation, Texas		
I.	**Significant Revision** *(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)*	
A.	Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322?	☒ YES ☐ NO
B.	Indicate the alternate language(s) in which public notice is required: Spanish	
C.	Will, there be a change in air pollutant emissions as a result of the significant revision?	☒ YES ☐ NO

Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 3
Texas Commission on Environmental Quality

Using the table below, indicate the air pollutant(s) that will be changing and include a brief description of the change in pollutant emissions for each pollutant:

Pollutant	Description of the Change in Pollutant Emissions
Carbon Monoxide (CO)	Increase in hourly and annual emissions
Nitrous Oxide (NOx)	Increase in hourly and annual emissions
Sulfur Dioxide (SO2)	Increase in hourly and annual emissions
Volatile Organic Compounds (VOC)	Increase in hourly and annual emissions
Particulate Matter (PM)	Increase in hourly and annual emissions
Particulate Matter (PM10)	Increase in hourly and annual emissions
Particulate Matter (PM2.5)	Increase in hourly and annual emissions
Chlorine Compounds (HOCl, HCl)	Represent as Chlorine Compounds rather than just HOCl

Major NSR Summary Table

Permit Numbers: 127838 and PSDTX1588M1					Issuance Date: 09/22/2023		
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)**	**Special Condition/Application Information**	**Special Cond/Application Information**	**Special Condition/Application Information**
PE3-01	Dry Catalyst Filter	PM	<0.01	<0.01	7, 24	7, 24, 30, 34	7
		PM_{10}	<0.01	<0.01			
		$PM_{2.5}$	<0.01	<0.01			
PE3-02A	Elutriator Cyclone A	PM	0.40	1.75	4, 8, 19, 20, 24	4, 8, 19, 20, 24, 34	4, 8, 19
		PM_{10}	0.13	0.56			
		$PM_{2.5}$	0.03	0.15			
		VOC	0.22	(6)			
PE3-02B	Elutriator Cyclone B	PM	0.40	1.75	4, 8, 19, 20, 24	4, 8, 19, 20, 24, 34	4, 8, 19
		PM_{10}	0.13	0.56			
		$PM_{2.5}$	0.03	0.15			
		VOC	0.22	(6)			
PE3-03	Powder Surge Hopper Filter	PM	0.01	0.03	4, 7, 24	4, 7, 24, 30, 34	4, 7
		PM_{10}	0.01	0.03			
		$PM_{2.5}$	0.01	0.03			
		VOC	0.15	0.66			
PE3-04	Powder Feeder Filter	PM	<0.01	0.02	4, 7, 24	4, 7, 24, 30, 34	4, 7
		PM_{10}	<0.01	0.02			
		$PM_{2.5}$	<0.01	0.02			
		VOC	0.10	0.44			

Major NSR Summary Table

Permit Numbers: 127838 and PSDTX1588M1					Issuance Date: 09/22/2023		
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)**	**Special Condition/Application Information**	**Special Cond/Application Information**	**Special Condition/Application Information**
PE3-05	Additive Hopper Filter	PM	0.01	0.02	7, 24	7, 24, 30, 34	7
		PM_{10}	0.01	0.02			
		$PM_{2.5}$	0.01	0.02			
PE3-06	Additive Feeder Filter	PM	<0.01	0.01	7, 24	7, 24, 30, 34	7
		PM_{10}	<0.01	0.01			
		$PM_{2.5}$	<0.01	0.01			
PE3-07	Pellet Dryer Cyclone	PM	0.62	2.73	4, 8, 19, 20, 24	4, 8, 19, 20, 24, 34	4, 8, 19
		PM_{10}	0.01	0.03			
		$PM_{2.5}$	<0.01	0.01			
		VOC	0.97	(6)			
PE3-08A	Product Silo A Filter	PM	0.33	0.73	4, 7, 19, 20, 24	4, 7, 19, 20, 24, 30, 34	4, 7, 19
		PM_{10}	0.33	0.73			
		$PM_{2.5}$	0.33	0.73			
		VOC	0.91	(6)			
PE3-08B	Product Silo B Filter	PM	0.33	0.73	4, 7, 19, 20, 24	4, 7, 19, 20, 24, 30, 34	4, 7, 19
		PM_{10}	0.33	0.73			
		$PM_{2.5}$	0.33	0.73			
		VOC	0.91	(6)			

Major NSR Summary Table

Permit Numbers: 127838 and PSDTX1588M1					Issuance Date: 09/22/2023		
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)**	**Special Condition/Application Information**	**Special Cond/Application Information**	**Special Condition/Application Information**
PE3-10, PE3-15	Elevated Flare or Enclosed Ground Flare Hourly CAP	CO (Elevated Flare Option)	58.52	-	3, 4, 10, 11, 25	3, 4, 10, 11, 25, 34	3, 4, 25
		NO_x (Elevated Flare Option)	11.36	-			
		CO (EGF Option)	92.00	-			
		NO_x (EGF Option)	23.27	-			
		SO_2	<0.01	-			
		VOC	148.05	-			
PE3-10, PE3-15	Elevated Flare or Enclosed Ground Flare Annual CAP	CO	-	7.49	3, 4, 10, 11, 25	3,4, 10,11, 25, 34	3,4, 25
		NO_x	-	2.64			
		SO_2	-	0.01			
		VOC	-	9.74			
PE3-11A, PE3-11B, HEX-02	Thermal Oxidizers A & B, Hexene Plant Thermal Oxidizer	NO_x	2.53	4.12	3, 4, 12, 13, 19, 24	3, 4, 12, 13, 19, 24, 34	3, 4, 12, 13, 19
		PM	0.31	0.51			
		PM_{10}	0.31	0.51			
		$PM_{2.5}$	0.31	0.51			
		CO	3.48	5.66			
		SO_2	0.02	0.01			
		VOC	0.93	2.30			

Major NSR Summary Table

Permit Numbers: 127838 and PSDTX1588M1					Issuance Date: 09/22/2023		
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)**	**Special Condition/Application Information**	**Special Cond/Application Information**	**Special Condition/Application Information**
PE3-12	PE3 Cooling Tower (5)	Chlorine Compounds	<0.01	<0.01	4, 18	4, 18, 34	4
		PM	1.53	4.29			
		PM_{10}	0.36	1.56			
		$PM_{2.5}$	<0.01	0.01			
		VOC	1.18	5.17			
PE3-13	Fugitives (5)	Cl_2	<0.01	0.02	3, 4, 14, 15, 16, 17	3, 4, 14, 15, 16, 17, 34	3, 4, 14
		VOC	12.03	52.68			
PE3-14	Extruder Feed Hopper Filter	PM	<0.01	0.01	4, 7, 24	4, 7, 24, 30, 34	4, 7
		PM_{10}	<0.01	0.01			
		$PM_{2.5}$	<0.01	0.01			
		VOC	0.03	0.15			
PE3-MAINT	PE3 Maintenance Fugitives	VOC	79.04	0.42	4, 26, 27, 28	4, 26, 27, 28, 29, 34	4
		PM	11.96	0.05			
		PM_{10}	6.52	<0.01			
		$PM_{2.5}$	6.52	<0.01			

Major NSR Summary Table

Permit Numbers: 127838 and PSDTX1588M1					Issuance Date: 09/22/2023		
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)**	**Special Condition/Application Information**	**Special Cond/Application Information**	**Special Condition/Application Information**
PE3-10, PE3-15, PE3-TEMP	PE3 Flare System or Temporary Control Device (PE3 MSS Contribution) Hourly CAP	VOC	506.36	-	4, 10, 11, 25, 26, 27, 28, 32, 33	4, 10, 11, 25, 26, 27, 28, 33, 34	4, 25
		NO_x (Elevated Flare Option)	49.04	-			
		CO (Elevated Flare Option)	278.85	-			
		NO_x (EGF Option)	99.51	-			
		CO (EGF Option)	437.51	-			
PE3-10, PE3-15, PE3-TEMP	PE3 Flare System or Temporary Control Device (PE3 MSS Contribution) Annual CAP	VOC	-	4.13	4, 10, 11, 25, 26, 27, 28, 32, 33	4, 10, 11, 25, 26, 27, 28, 33, 34	4, 25
		NO_x	-	2.24			
		CO	-	18.81			
PE3-CAP	Cap for Downstream Pellet Handling VOCs	VOC (6)	-	10.13	4, 5, 6, 9, 20, 21, 22, 23	4, 5, 6, 9, 20, 21, 22, 23, 34	4

(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
NO_x - total oxides of nitrogen
SO_2 - sulfur dioxide
PM - total particulate matter, suspended in the atmosphere, including PM_{10} and $PM_{2.5}$, as represented
PM_{10} - 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
Cl_2 - chlorine
Chlorine Compounds - hypochlorous acid and hydrogen chloride
EGF - Enclosed Ground Flare
(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.
(6) EPN PE3-CAP is representative of the annual cap for downstream pellet handling VOC emissions of the indicated EPNs.

From: Jasmine Yuan
Sent: Wednesday, July 17, 2024 12:11 PM
To: eric.quiat@powereng.com
Cc: sally.carroll@powereng.com; LeAnn M. Usoff/FTEHSF
Subject: RE: Technical Review - O4166 Formosa Plastics Corporation, Texas (Significant, 36614)

Hi Eric,
I got lost when I was checking your OP-REQ3. Can you please send me the word document of OP-REQ3 (it is better to have MRRT on the same page with related standards)?
I tried to figure out which are new requested manual builds, which are existing manual build updates. Some unit have new Index of MACT FFFF, in addition of current index number 63FFFF-1.
I would appreciate your clarification on this MACT FFFF manual build requests.

For NSPS DDD, will you be able to use UA28 to add NSPS DDD, then we can do manual edits on top of it? or do you prefer to use UA1 for NSPS DDD requirements?

Below are the deficiency items I found during the review

1. Four permit shields for 30 TAC Chapter 115, Vent Gas for units PE3-15, VENTPE3-15, VNTHEX-02, and VENTPE3-10 were requested based on being located in Jackson County. We are aiming to streamline our permit shield review and focus on rules that are truly potentially applicable, and so since changing location is not an operational parameter that the applicant could vary for their units, location-based shields are unnecessary. Please consider not to have it in permit. For the existing permit shields based on location, we'd like to remove these either this project or next renewal.
2. The units PE3-15 and PE3-10 on UA7 for MACT CC use index number 63FFFF-4 instead of 63CC. Is this a mistake or intentional decision?
3. Why does the Major NSR Summary Table have issuance date 05/03/2024. It does not match OP-REQ1 page 87. If that is the recent authorization, please send me the permit face, MRT, CND. I cannot find it in our system.
4. Please revise this name to cut 6 characters. It is too long to fit our system. The name/description has maximum 50 characters limit.

A	11	PE3-SVD	OP-REQ2	Storage Vessel Degassing (SVD) Requirements Post MON RTR		127838	PSDTX1588M1
	12	VENTPE3-10	OP-REQ3	Vent to Flare		127838	PSDTX1588M1

My next step is to sort out all manual build/edits and send them to our technical specialist Ms. Carolyn Maus to review.
It usually takes her a month to approve or give comments. Then I will pass her comments to you and see if you agree or not.

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.

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.

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.
Jasmine Yuan

From: eric.quiat@powereng.com <eric.quiat@powereng.com>
Sent: Wednesday, July 17, 2024 9:17 AM
To: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>
Cc: sally.carroll@powereng.com; LeAnn M. Usoff/FTEHSF <LeAnnU@ftpc.fpcusa.com>
Subject: RE: FPC TX permit O4166

Jasmine,

Good morning. Can you provide an update on the status of the significant revision application (tceq project 36614) review?

ERIC QUIAT, P.E.
PROJECT MANAGER

512-579-3823

512-496-7655 cell

POWER Engineers, Inc.
www.powereng.com [linkprotect.cudasvc.com]

[linkprotect.cudasvc.com]

From: Quiat, Eric
Sent: Monday, June 17, 2024 9:19 AM
To: Jasmine.Yuan@tceq.texas.gov
Cc: LeAnn M. Usoff/FTEHSF <LeAnnU@ftpc.fpcusa.com>; Carroll, Sally <sally.carroll@powereng.com>
Subject: FPC TX permit O4166

Jasmine,

Thanks for speaking to me last week. At this time the renewal will be kept separate from the significant revision project you are working (i.e., a separate renewal application will be submitted). I just wanted to give you a brief update to let you know so this will not affect your review.

Thank you,

ERIC QUIAT, P.E.
PROJECT MANAGER

512-579-3823
512-496-7655 cell

POWER Engineers, Inc.
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Texas Commission on Environmental Quality

Title V Existing

4166

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	PE3 PLANT
Does the site have a physical address?	No
Because there is no physical address, describe how to locate this site:	201 Formosa Drive
City	Point Comfort
State	TX
ZIP	77978
County	CALHOUN
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?	Owner Operator
What is the applicant's Customer Number (CN)?	CN600130017
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Formosa Plastics Corporation, Texas
Texas SOS Filing Number	5107506
Federal Tax ID	222355464
State Franchise Tax ID	12223554648
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 applicable)	9 PEACH TREE HILL RD
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 contact.	MIKE RIVET(FORMOSA PLASTIC...)
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 applicable)	PO BOX 700
Routing (such as Mail Code, Dept., or Attn:)	
City	POINT COMFORT
State	TX
Zip	77978
Phone (###-###-####)	3619877000
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	mikerivet@ftpc.fpcusa.com

Technical Contact

Person TCEQ should contact for questions about this application:	
Select existing TC contact or enter a new contact.	New Contact
Organization Name	Formosa Plastics Corporation Texas
Prefix	MS
First	LeAnn
Middle	
Last	Usoff
Suffix	
Credentials	
Title	Air Permitting Assistant Manager
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 700
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:	SOP
2) Permit Latitude Coordinate:	28 Deg 41 Min 20 Sec
3) Permit Longitude Coordinate:	96 Deg 32 Min 50 Sec
4) Is this submittal a new application or an update to an existing application?	New Application
4.1. What type of permitting action are you applying for?	Administrative Action
5) Who will electronically sign this Title V application?	Duly Authorized Representative

6) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

[File Properties]

File Name	OP-DEL MIke R Title Chg - 06.20.2024.pdf
Hash	DE790593D5858DF4D63E09D221CE4E40C3B33BB9E9DA4367EB023DD550BE3426
MIME-Type	application/pdf

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 4166.
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:	24.116.223.222
Signature Date:	2024-06-25

Signature Hash:	1D96686854B12E0F5FA241401E07955B06BD2257800F82BF7A872089D866131A
Form Hash Code at time of Signature:	68CEB05F06675B13436FFFDDFC3856E934555CE52914CEF11FBBDB01A10E8299

Submission

Reference Number:	The application reference number is 658785
Submitted by:	The application was submitted by ER093335/Mike Rivet
Submitted Timestamp:	The application was submitted on 2024-06-25 at 08:24:46 CDT
Submitted From:	The application was submitted from IP address 24.116.223.222
Confirmation Number:	The confirmation number is 547526
Steers Version:	The STEERS version is 6.77
Permit Number:	The permit number is 4166

Additional Information

Application Creator: This account was created by Eric Quiat

Texas Commission on Environmental Quality
Form OP-DEL
Delegation of Responsible Official Information
Federal Operating Permit Program

A Responsible Official (RO) may choose to delegate signature authority to a Duly Authorized Representative (DAR). Such delegation may be made to an individual that has responsibility for the overall operation of one or more manufacturing, production, or operating facilities applying for, or subject to, a federal operating permit. **Send this completed form to the TCEQ Central Office to the attention of the Air Permits Division.** Signature stamps can be accepted in place of an original signature. Faxes, photocopies, and electronic submittals can be accepted in place of an original Form OP-DEL; however, a follow-up submittal of the original Form OP-DEL is requested

I. Identifying Information		
Account No.: CB0038Q	RN: 100218973	CN: 600130017
Permit No.: O1484	Area Name: Ethylene Glycol Plant	
Company Name: Formosa Plastics Corporation, Texas		
II. Duly Authorized Representative Information		
Action Type: ☐ New DAR Identification	☒ Administrative Information Change	
Conventional Title: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)		
Name: Mike Rivet		
Title: Assistant Vice President/Site Manager	Delegation Effective Date:	
Telephone No.: 361-987-7000	Fax No.:	
Company Name: Formosa Plastics Corporation, Texas		
Mailing Address: P.O. Box 700		
City: Point Comfort	State: TX	ZIP Code: 77978
E-mail Address: tlasater@ftpc.fpcusa.com		
III. Certification of Truth, Accuracy, and Completeness		
I, Mike Rivet ,certify that, based on *(Name printed or typed: RO for New DAR Identification; RO or DAR for Administrative Information Change)* information and belief formed after reasonable inquiry, the statements, and information stated above are true, accurate, and complete. *(RO signature required for New DAR Identification only; DAR signature required for any Action Type)* Responsible Official Signature:_____ Date:_____ Duly Authorized Representative Signature: M2Rivet Date: 6/20/2024		
IV. Removal of Duly Authorized Representative(s)		
The following should be removed as Duly Authorized Representative(s): _____ Effective Date:_____ *(Name(s) printed or typed)* Responsible Official Signature:_____ Date:_____		

Texas Commission on Environmental Quality
Form OP-DEL
Delegation of Responsible Official Information
Federal Operating Permit Program
(Extension)

V. Additional Identifying Information					
Account No.:	CB0038Q	RN:	100218973	CN:	600130017
Permit No.:	O1951	Area Name:	Utilities Plant and Technicial and Maintenance Depts		
Account No.:	CB0038Q	RN:	100218973	CN:	600130017
Permit No.:	O1953	Area Name:	Caustic/Chlorine and EDC Plants		
Account No.:	CB0038Q	RN:	100218973	CN:	600130017
Permit No.:	O1954	Area Name:	EDC Cracking, VCM & PVC Processing Facility		
Account No.:	CB0038Q	RN:	100218973	CN:	600130017
Permit No.:	O1955	Area Name:	Traffic Facilities		
Account No.:	CB0038Q	RN:	100218973	CN:	600130017
Permit No.:	O1956	Area Name:	Polypropylene Plant		
Account No.:	CB0038Q	RN:	100218973	CN:	600130017
Permit No.:	O1957	Area Name:	Polyethylene Plant		
Account No.:	CB0038Q	RN:	100218973	CN:	600130017
Permit No.:	O1958	Area Name:	Olefins Plant		
Account No.:	CB0038Q	RN:	100218973	CN:	600130017
Permit No.:	O3409	Area Name:	Specialty PVC Plant		
Account No.:	CB0038Q	RN:	100218973	CN:	600130017
Permit No.:	O3421	Area Name:	Formosa Plastics Energy/Steam Generating Facility		
Account No.:	CB0038Q	RN:	100218973	CN:	600130017
Permit No.:	O4165	Area Name:	Olefins 3 & Propane Dehydrogenation (PDH) Plant		
Account No.:	CB0038Q	RN:	100218973	CN:	600130017
Permit No.:	O4166	Area Name:	PE3 Plant		
Account No.:	CB0038Q	RN:	100218973	CN:	600130017
Permit No.:	O4212	Area Name:	Utilities 3 (UT3) Plant		
Account No.:	CB0038Q	RN:	100218973	CN:	600130017
Permit No.:	O4286	Area Name:	LDPE Plant		

Reset Form

Texas Commission on Environmental Quality
Form OP-DEL
Delegation of Responsible Official Information
Federal Operating Permit Program
(Extension)

V. Additional Identifying Information			
Account No.: CB0038Q	RN: 100218973		CN: 600130017
Permit No.: O4293		Area Name: Ethylene Glycol 2 (EG2) Plant	
Account No.:	RN:		CN:
Permit No.:		Area Name:	
Account No.:	RN:		CN:
Permit No.:		Area Name:	
Account No.:	RN:		CN:
Permit No.:		Area Name:	
Account No.:	RN:		CN:
Permit No.:		Area Name:	
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Permit No.:		Area Name:	
Account No.:	RN:		CN:
Permit No.:		Area Name:	
Account No.:	RN:		CN:
Permit No.:		Area Name:	

Reset Form

From: Jasmine Yuan
Sent: Tuesday, June 11, 2024 10:00 AM
To: eric.quiat@powereng.com
Subject: RE: Revision application for permit O4166

Hello Eric,
I am assigned to your significant revision O4166, Project 36614.
I called you just now and it went to voicemail. I will try later again.
Jasmine

From: eric.quiat@powereng.com <eric.quiat@powereng.com>
Sent: Tuesday, June 11, 2024 9:43 AM
To: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>
Subject: Revision application for permit O4166

Jasmine,

Please give me a call I would like to discuss the renewal of this permit in addition to the revision application.

ERIC QUIAT, P.E.
PROJECT MANAGER

512-579-3823
512-496-7655 cell

POWER Engineers, Inc.
www.powereng.com [linkprotect.cudasvc.com]

[linkprotect.cudasvc.com]

From: Jasmine Yuan
Sent: Tuesday, June 11, 2024 9:57 AM
To: Rhyan Stone; Elizabeth Moorhead
Subject: RE: Project 36614

Thank you! Resolved.

From: Rhyan Stone <Rhyan.Stone@tceq.texas.gov>
Sent: Tuesday, June 11, 2024 9:44 AM
To: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>; Elizabeth Moorhead <elizabeth.moorhead@tceq.texas.gov>
Subject: Project 36614

Good morning,

I just received a call from the consultant working on Significant Revision Project 36614 for Formosa. He plans to reach out to Jasmine to request rolling in their renewal with the significant revision.

Thanks,
Rhyan

Rhyan S. Stone
Team Leader
Operating Permits Section
Air Permits Division
Texas Commission on Environmental Quality
P.O. Box 13087, MC 163
Austin, TX 78711
Phone: (512) 239 -1293

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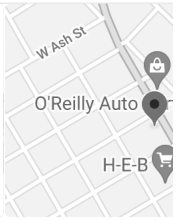
Fontana Regional Library
https://fontanalib.org › jackson

Jackson County Public Library - Sylva, NC



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Public library	Senior citizen center	County government office	Public library

About this data

From: eNotice TCEQ
To: Lois.Kolkhorst@senate.texas.gov; JM.lozano@house.texas.gov
Subject: TCEQ Notice - Permit Number O4166
Date: Monday, May 6, 2024 11:13:25 AM
Attachments: TCEQ Notice - O4166_36614.pdf

This email is being sent to electronically transmit an official document issued by the Office of Air of the Texas Commission on Environmental Quality.

This email is being sent to you because either (a) you filed a document with the Office of the Chief Clerk that made you part of the official mailing list for the above referenced matter, or (b) notice to you is legally required. As authorized by Texas Water Code 5.128, this electronic transmittal is replacing the previous practice of hard copy distribution. Amendments to Texas Government Code 552.137 prompted a change to the agency's privacy policy regarding confidentiality of certain email addresses. The revised privacy policy can be viewed at http://www.tceq.state.tx.us/help/policies/electronic_info_policy.html.

Questions regarding this email may be submitted either by replying directly to this email or by calling Mr. Jesse Chacon, P.E. with the Air Permits Division at (512) 239-5759.

The attached document is provided in an Adobe Acrobat .pdf format. If you cannot display the attachment, you may need to visit the Adobe web site (http://get.adobe.com/reader) to download the free Adobe Acrobat Reader software.

Calhoun County

Congressman Michael Cloud
U.S. Congressional District 27

Representative J. M. Lozano
Texas House District 43

Senator Lois W. Kolkhorst
Texas Senate District 18

Mr. LJ Francis
State Board of Education District 2

Senator John Cornyn
U.S. Senate

Senator Ted Cruz
U.S. Senate

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Website for **Calhoun County** Public **Library**, located in Port Lavaca, Texas, and branch **libraries** located in Seadrift, Point Comfort and Port O'Connor.
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Quickly find the contact information and hours of operation for each **library** location on this page! Main Location – Port Lavaca. (361) 552-READ (7323)

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Calhoun County Public **Library** proudly serves the community of **Calhoun County** which includes Port Lavaca, Seadrift, Point Comfort, and Port O'Connor.
Rating: 5 · 15 votes

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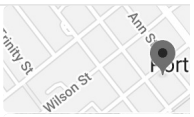
Public Library of Anniston-Calhoun County
https://www.publiclibrary.cc

Public Library of Anniston-Calhoun County



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Phone: (361) 552-7323

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Calhoun County Library - Hours & Location

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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

May 6, 2024

THE HONORABLE LOIS KOLKHORST
TEXAS SENATE
PO BOX 12068
AUSTIN TX 78711-2068

Re: Accepted Federal Operating Permit Significant Revision Application
Project Number: 36614
Permit Number: O4166
Formosa Plastics Corporation, Texas
Pe3 Plant
Point Comfort, Calhoun County
Regulated Entity Number: RN100218973
Customer Reference Number: CN600130017

Dear Senator Kolkhorst:

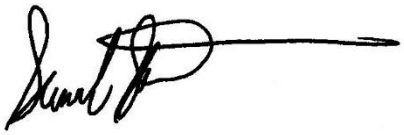
This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) significant revision application for a site located in your district. As part of this permitting process, the applicant is required to publish a formal newspaper public notice. The notice will inform the public of their right to make comments or request a public hearing. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. https://gisweb.tceq.texas.gov/LocationMapper/?marker=-96.547222,28.688888&level=13.

The FOP program regulates both new and existing major sources of emissions. The goal of the program is to improve air quality in Texas through increased compliance by codifying existing applicable regulatory requirements into the FOP. The FOP provides the applicant authorization to operate the equipment at the site. The FOP identifies and codifies air emission requirements (known as applicable requirements) that apply to the emission units at the site. The FOP does not authorize construction of emission units or emissions from those units. The New Source Review (NSR) permit is the mechanism for these authorizations.

Re: Accepted Federal Operating Permit Significant Revision Application

This letter is being sent to you for information only and no action is required. If you need further information, please contact me at (512) 239-1250.

Sincerely,



Samuel Short, Deputy Director
Air Permits Division
Office of Air
Texas Commission on Environmental Quality

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

May 6, 2024

THE HONORABLE JOSE M LOZANO
TEXAS HOUSE OF REPRESENTATIVES
PO BOX 2910
AUSTIN TX 78768-2910

Re: Accepted Federal Operating Permit Significant Revision Application
Project Number: 36614
Permit Number: O4166
Formosa Plastics Corporation, Texas
Pe3 Plant
Point Comfort, Calhoun County
Regulated Entity Number: RN100218973
Customer Reference Number: CN600130017

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https://gisweb.tceq.texas.gov/LocationMapper/?marker=-96.547222,28.688888&level=13.

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This letter is being sent to you for information only and no action is required. If you need further information, please contact me at (512) 239-1250.

Sincerely,

Samuel Short, Deputy Director
Air Permits Division
Office of Air
Texas Commission on Environmental Quality

From: Johnny Bowers
To: Richard Suniga
Subject: FW: STEERS Title V Application Submittal (New Application)
Date: Friday, May 3, 2024 8:53:25 AM

Please process. Thanks!

-----Original Message-----
From: steers@tceq.texas.gov <steers@tceq.texas.gov>
Sent: Thursday, May 2, 2024 3:11 PM
To: RFCAIR14 <rfcair14@tceq.texas.gov>; TVAPPS <tvapps@tceq.texas.gov>
Subject: STEERS Title V Application Submittal (New Application)

The TV-E application has been successfully submitted by KEN MOUNGER. The submittal was received at 05/02/2024 03:11 PM.

The Reference number for this submittal is 649895

The confirmation number for this submittal is 538243.
The Area ID for this submittal is 4166.
The Project ID for this submittal is 36614.
The hash code for this submittal is 3BE9EE6035FD258E17021AD150A06C6066C35B8FA1F46B6E370EB3295EA5EE3F.

You may access the original application submittal and the notice of final action documents from the COR Viewer which is available at https://ida.tceq.texas.gov/steersstaff/index.cfm?fuseaction=openadmin.submitlog&newsearch=yes.

If you have any questions, please contact the STEERS Help Line at 512-239-6925 or by e-mail at steers@tceq.texas.gov.

Formosa Plastics®

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

May 3, 2024

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
PE3 Plant Title V SOP Significant Revision Application
TCEQ Air Quality Project Number: TBA
TCEQ Title V Permit Number: O4166
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) significant revision application for the PE3 Plant located in Point Comfort, Jackson County, Texas. The enclosed application satisfies the requirements for SOP revisions under 30 TAC Chapter 122.

The enclosed application includes the following forms: OP-CRO1, OP-1, OP-2, OP-SUMR, OP-REQ1, OP-REQ2, OP-REQ3, OP-UA7, and Public Involvement Plan forms.

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

Digitally signed by Mike Rivet
DN: cn=Mike Rivet, o=FPCTX, ou=GMO, email=mikerivet@ftpc.fpcusa.com, c=US
Date: 2024.05.02 08:39:02 -05'00'

Mike Rivet
Executive Director/Site Manager
Formosa Plastics Corporation, Texas

Enclosure

Formosa Plastics®

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

CC: Electronic Delivery via STEERS
Air Program Manager, Region 14
Texas Commission on Environmental Quality
500 North Shoreline Blvd, Ste 500
Corpus Christi, Texas 78401-0318
(Copy of the Application)

Electronic Delivery: R6AirPermitsTX@epa.gov
EPA Region 6

May 2024

SIGNIFICANT REVISION APPLICATION FOR PE3 PLANT TITLE V SITE OPERATING PERMIT (SOP)

Formosa Plastics Corporation, Texas
Polyethylene 3 (PE3) Plant
Point Comfort, Texas

Customer Reference No. CN600130017
Regulated Entity No. RN100218973

Submitted To:
Texas Commission on Environmental Quality
Air Division
P.O. Box 13087
Austin, Texas 78711-3087

PROJECT NUMBER:
0179542.05.01

POWER ENGINEERS

TABLE OF CONTENTS

APPENDICES:

1.0 INTRODUCTION

Formosa Plastics Corporation, Texas (FPC TX) currently operates a number of chemical plants at their chemical complex near Point Comfort, in Calhoun and Jackson Counties, Texas. FPC TX's PE3 Plant in Jackson County, Texas is currently authorized by Air Quality Permit Nos. 127838, PSDTX1588M1, and Title V Site Operating Permit (SOP) No. O4166.

FPC TX is submitting this Title V SOP significant revision application to reflect changes from the amendment to the PE3 Plant NSR Permit 127838 and PSD Permit PSDTX1588M1 issued on September 22, 2023. Other revision requests are detailed further in Section 1.1 below. This application contains the following updated information required by the SOP application procedures specified in 30 TAC 122.220 as well as additional supporting information:

- Site location map and plot plan with emission units designated;
- Description of the processes and associated process flow diagrams;
- General and administrative forms OP-CRO1, OP-1, OP-2, and OP-SUMR *(Appendix A)*;
- Potentially applicable requirements forms OP-REQ1, OP-REQ2, and OP-REQ3 *(Appendix B);*
- Unit attribute form OP-UA7 *(Appendix C);*
- Major NSR Summary Table *(Appendix D);*
- Public Involvement Plan form *(Appendix E);* and
- Alternative Method of Compliance (AMOC) No. 224 *(Appendix F)*

Sections 2.0, 3.0, and 4.0 of this application include site descriptive information such as the site location map, plot plan, and process information. Section 5.0 and the related appendices include the necessary TCEQ application forms as well as other information listed above.

1.1 Summary of SOP Revisions

The PE3 Plant NSR Permit 127838 was recently amended to address changes at the PE3 Plant associated with the construction of a new Hexene Plant (under separate NSR Permit No. 170552 and PSDTX1610). Jackson County is designated as attainment/unclassifiable for all criteria pollutants. The PE3 Plant NSR Permit 127838 amendment application was subject to PSD review for VOC; therefore, a modification to the PSD permit was also issued, PSDTX1588M1.

FPC TX is submitting this Title V significant revision application to address the PE3 Plant NSR amendment as well as update a few other items. The following revisions to the SOP are being requested:

- Address NSR Permit 127838 permit amendment changes including:
    - Addition of new unassisted enclosed ground flare (EGF) (ID No: PE3-15)
    - Revise fugitive component counts for new piping (ID No: PE3-13)
    - Authorize vent streams to new EGF or the Hexene Plant thermal oxidizer (EPN: HEX-02). The Hexene Plant thermal oxidizer is permitted in a separate NSR Permit No. 170552.
    - Addition of one new cell to the PE3 cooling tower (ID No: PE3-12)
- Address 40 CFR Part 63 Subpart FFFF (MON MACT) regulation updates

- Update 40 CFR Part 60 Subpart A and 40 CFR Part 63 Subpart A citations for the existing elevated flare (ID No: PE3-10)
- Address specific applicable citations for 40 CFR Part 63 Subpart FFFF for the fugitives (ID No: PE3-13)
- Update MON MACT Subpart FFFF citations and add a permit shield for Chapter 115, Vent Gas Control for the vent streams to the existing elevated flare (ID No: VENTPE3-10)
- Incorporate AMOC No. 224
- Update Technical Contact in OP-1

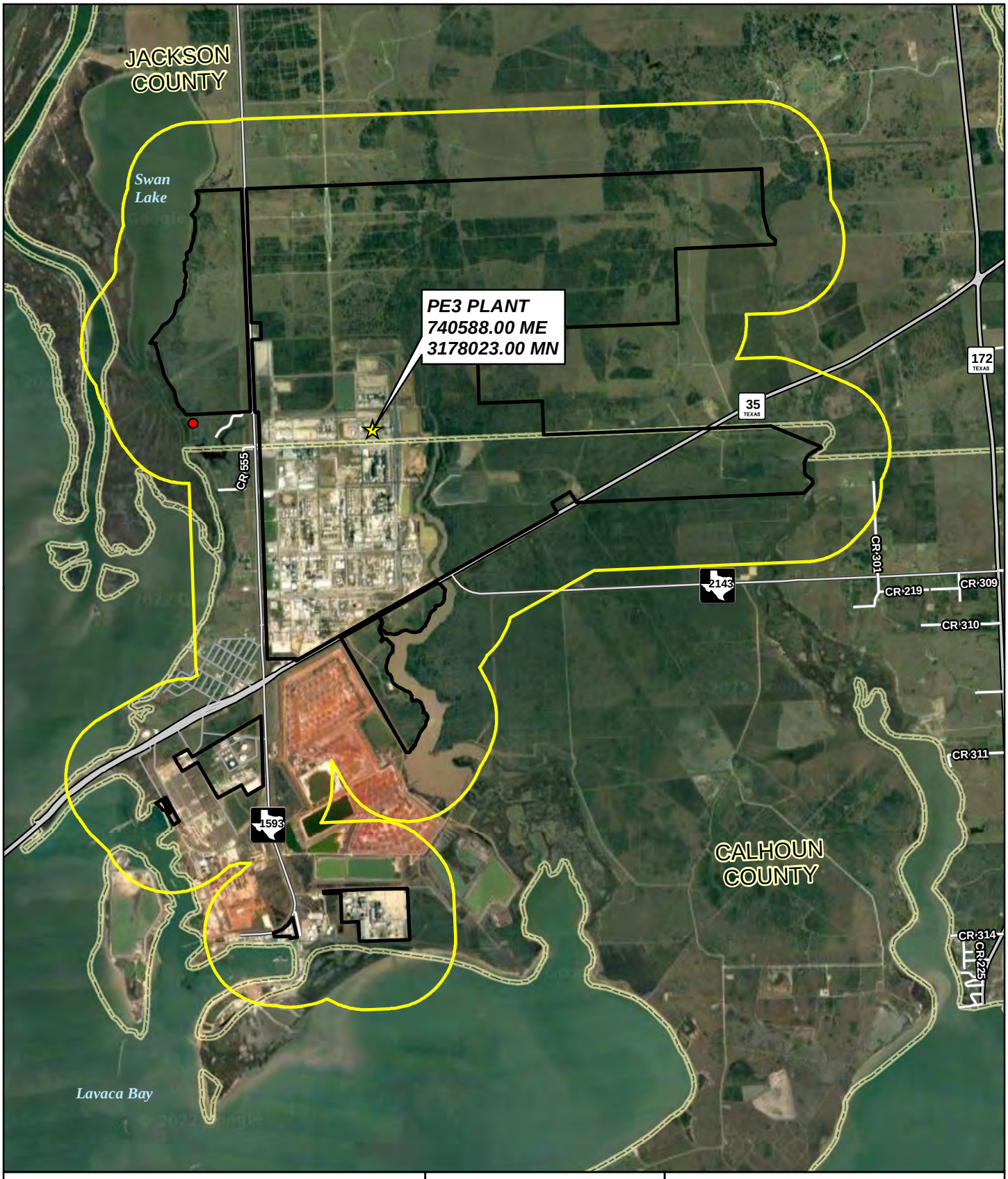
1.2 Incorporation of AMOC

As specified at 40 CFR 63.2445(g), the original MON MACT RTR compliance deadline for affected MCPU flare control devices is August 12, 2023. However, FPC TX has applied for and received from TCEQ a one-year compliance extension, until August 12, 2024, for certain flare-related MON RTR provisions. This compliance extension is provided in Appendix F in the form of a TCEQ-approved Alternative Method of Compliance (AMOC) No. 224, dated July 13, 2023. FPC TX is proposing to incorporate this AMOC into SOP O4166 with this significant SOP revision.

2.0 SITE LOCATION

The PE3 Plant is located at the FPC TX Point Comfort Site, which is immediately east of Farm Road 1593, west of Cox Creek, and north of State Highway 35. The PE3 Plant is located in Jackson County.

A scaled area map and overall plot plan for the FPC TX Complex that shows the location of the PE3 Plant is included in this section.



Legend

- Property Boundary
- PE3 Plant
- Nearest Receptor
- 3000' Radius

0 0.5 1
Miles

TEXAS
Project Location

FORMOSA PLASTICS CORPORATION

AREA MAP

POINT COMFORT, CALHOUN COUNTY, TEXAS

POWER ENGINEERS

Date: 8/31/2022

Path: astfs1:\Formosa Plastics\Phase V FPC Expn\GIS

3.0 PLOT PLAN

A detailed plot plan of the PE3 Plant is provided in this section of the application. Emission points are identified on the detailed plot plan.

FORMOSA PLASTICS CORPORATION, TEXAS

PLOT PLAN

POLYETHYLENE 3 (PE3) PLANT
POINT COMFORT, TEXAS

BENCHMARK:
UTM Zone 14
740,705 mE
3,178,188 mN

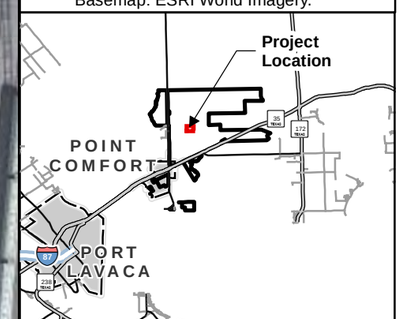
BENCHMARK:
740,450 mE
3,177,993 mN

PE3-10
PE3-15
PE3-12
PE3-11B
PE3-11A
PE3-08A
PE3-08B
PE3-04
PE3-02A
PE3-02B
PE3-07
PE3-01
PE3-03
PE3-14
PE3-05
PE3-06
PE3-13
PE3-TEMP

Legend

- Point Source
- Area Source
- Area Source
- Property Boundary

Basemap: ESRI World Imagery.



0 100 200
Feet

POWER ENGINEERS

Date: 9/14/2022

Path: H:\Formosa Plastics\159263 PE3 As-built NSR amend\GIS\Apps

4.0 PROCESS DESCRIPTION AND FLOW DIAGRAM

This section describes the PE3 Plant in FPC TX's Point Comfort Complex. The PE3 Plant produces different grades of polyethylene product. The process utilizes a low pressure, gas phase polymerization process. This process includes raw material purification, polymerization, powder degassing, pellet extrusion, resin handling, cooling tower, vent collecting system, and storage tanks. The major sections of the PE3 Plant are described below in detail. The following discussion refers to stream numbers listed on the process flow diagram, which is included at the end of this section.

Raw Material Purification

Raw materials are received either from neighboring units or from outside of the Complex. Raw materials (1-butene, 1-hexene, isopentane) pass through stripping columns and treating beds to remove dissolved gas, water and other impurities (Stream 1), and then are injected into the reactor. Gaseous raw materials (ethylene, hydrogen, and nitrogen) pass through treating beds to remove trace amounts of impurities before entering the reactor (Stream 2). A single regeneration system is shared among the raw material purification beds.

Polymerization

This process utilizes both dry, sand-like catalyst and slurry type catalyst. Dry catalyst is periodically transferred by nitrogen from a dry catalyst bin to dry catalyst feeders (Stream 3). Nitrogen is released to atmosphere through a filter (FIN/EPN: PE3-01). Accumulated catalyst powder inside the filter is periodically removed for reuse or transferred off-site.

Slurry catalyst is received in cylinders. Nitrogen is used to push slurry catalyst into buffer tanks (Stream 4) from which the slurry catalyst is then pumped to the reactor (Stream 5).

A metal alkyl, which serves as a co-catalyst in the manufacture of certain grades of PE resin, is received in cylinders. Nitrogen is used to push the metal alkyl to the feed pot (Stream 6). From the feed pot, the metal alkyl is injected into the reactor (Stream 7). The metal alkyl is highly reactive with water. For safety reasons, the vents in the metal alkyl system are routed to a seal pot filled with mineral oil where any of the metal alkyl in these vents is expected to be absorbed. The pressure safety valve on top of the seal pot is equipped with a rupture disc which, in case of an emergency and for safety reasons, discharges directly to the atmosphere at a safe location.

Before introducing reactants into the reactor, a closed loop nitrogen conveying system is used to transfer polyethylene powder from seed bed silos to the reactor (Stream 17) to establish an initial fluidizing state in the reactor for startup.

Ethylene, comonomer (1-butene and 1-hexene) and hydrogen are then fed into the reactor. In the presence of catalyst, polymerization occurs inside the fluidized bed reactor. Circulating gas passes through a cycle gas cooler (Streams 9 and 10) providing a mechanism to remove heat from the reaction. Inside the cycle gas cooler, the shell side contains cooling water and the tube side contains cycle gas (under high pressure). In the unlikely event of a catastrophic tube failure, the cycle gas would cause the shell side to rapidly over pressure. To relieve this pressure and for safety reasons, a relief valve equipped with a rupture disc is installed on the cooler to relieve the pressure as quickly as possible and preserve vessel integrity in the unlikely event of a heat exchanger tube rupture. A large amount of water and hydrocarbon would be released to the atmosphere in this event. Because of the large quantity of water, it would be impractical to vent this release to the flare header. In the unusual circumstance that a tube failure occurs

and the rupture disk and relief valve vent, the relief valve vents to a safe location and the process is immediately shut down.

Powder Degassing

Polyethylene powder is discharged from the reactor to product chambers (Stream 11), then into the powder purge bin (Stream 12). Nitrogen is supplied to the powder purge bin to remove residual VOC. The powder purge bin is equipped with a rupture disc which, in case of an emergency and for safety reasons, discharges directly to the atmosphere at a safe location. If this emergency vent stream was routed to flare, powder could plug the flare line, resulting in unsafe conditions.

The entrained gas and the purge nitrogen vent through a filter at the top of the powder purge bin and to a vent recovery system (Stream 13) used to recover comonomer. In the recovery system, the gas stream is compressed and condensed. Condensed comonomer is pumped back to the reactor (Stream 14). Compressed gas is used to convey powder from product chambers to the powder purge bin (Stream 15).

After the product purge bin, powder is dropped by gravity (Stream 16) to an enclosed powder sieve to separate oversized material. From the sieve, powder is dropped to a powder surge hopper equipped with a filter (FIN/EPN: PE3-03). Remaining gas is vented to atmosphere after the filter.

From the powder surge hopper, powder can be dropped to the powder feeder by gravity (Stream 8); transferred to seed bed silos (Stream 17A) or transferred to reactor during startup (Stream 17) by a pneumatic conveying system. This pneumatic system adopts a closed nitrogen loop design instead of an open-air system to eliminate particulate emission. Nitrogen from the bag filters on top of seed bed silos returns back to the suction side of the blowers (Stream 18).

Powder in seed bed silos is stored until the next reactor startup. As already described in the "Polymerization" section, powder is transferred to the reactor for initial startup using the same loop nitrogen conveying system (Streams 17 and 19).

Pellet Extrusion

Powder from the surge hopper is dropped to a powder feeder by gravity and thence to the extruder. The vent from the powder feeder (Stream 20) is equipped with a bagfilter (FIN/EPN: PE3-04).

A variety of additives are fed into the extruder as well. Additives are first loaded into additive hoppers, then dropped to additive feeders, then fed to the extruder. Additive hoppers are under nitrogen purge to prevent degradation. Vents from the additive hoppers are collected (Stream 21) and filtered before being discharged to atmosphere (FIN/EPN: PE3-05). A special additive, called "Anti-block", is stored in an Anti-block hopper.

While feeders are periodically refilled, the vents from the feeders must be vented to a system with very low back pressure so that the feeding accuracy is not affected. Therefore, all the vent streams from feeders (Stream 22) are routed to another bagfilter (FIN/EPN: PE3-06).

Polyethylene powder and additives are mixed in the screw conveyor then fed to the extruder feed hopper (Stream 23). This extruder feed hopper is controlled by a bagfilter as well (FIN/EPN: PE3-14).

Polymer and additives are conveyed, mixed, and melted in the extruder. Melted polymer is pushed through a die plate to form polymer strands. The strands are then cut into pellets in an underwater cutting box. A water circulation pump lifts the pellets with water to the agglomerate remover (Stream 25), where

clumps and the majority of the water are separated from the pellets. Water returns back to the water tank (Stream 26). The pellets are further dried in the pellet dryer. The pellet dryer spins to create centrifugal force that strips water off the pellets surface without the need for a heating media. An exhaust fan downstream of the dryer introduces ambient air into the pellet dryer. During the drying process, polyethylene particles may be entrained in the air and VOC may evolve. The air stream (Stream 24) containing high moisture content and trace amount of VOC and particulate matter is vented to atmosphere through a cyclone (FIN/EPN: PE3-07).

Resin Handling

After pellet drying, pellets are conveyed by air into product silos (Stream 27). Before the product is sent to the loading station, each silo is self-blended with air (Streams 28 and 29) for a certain time. The conveying or blending air passes through bagfilters before venting to the atmosphere (FIN/EPN: PE3-08A, PE3-08B).

From the product silos, pellets are again air-transferred (Stream 30) to two loading station elutriators. Exhausts from the elutriators are controlled by cyclones (FIN/EPN: PE3-02A, PE3-02B). Pellets are then transferred by air from the elutriators to rail cars.

Cooling Tower

One cooling tower (FIN/EPN: PE3-12) provides process cooling water to the PE3 Plant and new Hexene Plant (permitted under separate NSR and PSD permits). This cooling tower consists of several counter-flow type cells with mechanical draft. Gaseous chlorine is used as a biocide.

Process Vent Collection and Control System

All vent streams containing VOCs, except those described above, are collected in the vent collection system and routed to a control device (thermal oxidizer or flare) for control.

This current system consists of a high-pressure header (Stream 31) routed to a flare (FIN/EPN: PE3-10) and a low-pressure header (Stream 32) routed to two thermal oxidizers (FIN/EPN: PE3-11A, PE3-11B). In future operations the PE3 high pressure vent stream can be routed to the PE3 Plant flare system, which includes either the new EGF (EPN: PE3-15) and/or the existing elevated flare (EPN: PE3-10). In future operations the PE3 low pressure vent stream can be routed to either (1) the PE3 Plant flare system which includes the new EGF (EPN: PE3-15) and/or the existing elevated flare (EPN: PE3-10), (2) the existing PE3 thermal oxidizers (EPNs: PE3-11A, PE3-11B), and/or (3) the new Hexene Plant's thermal oxidizer (EPN: HEX-02).

The high-pressure header accommodates high volume, high pressure or emergency vents. Those streams include reactor blowdown and safety relief valve discharges, and large equipment purge vents during MSS activities. The high-pressure header is discharged to the flare system (EPNs: PE3-10, PE3-15), with 99% (C1-C3) / 98% (C4+) VOC control.

The low-pressure header accommodates low volume, low pressure, and continuous vents. The low-pressure header is typically discharged to thermal oxidizers for 99.9% control of VOC. Natural gas (Stream 33) is added to the thermal oxidizers to maintain controlled temperature if the heating value of the waste gas is too low. As mentioned above, in future operations, the PE3 low pressure vent stream has the option of being routed to either (1) the PE3 Plant flare system which includes the new EGF (EPN: PE3-15) and/or the existing elevated flare (EPN: PE3-10), (2) the existing PE3 thermal oxidizers (EPNs: PE3-11A, PE3-11B), and/or (3) the new Hexene Plant's thermal oxidizer (EPN: HEX-02).

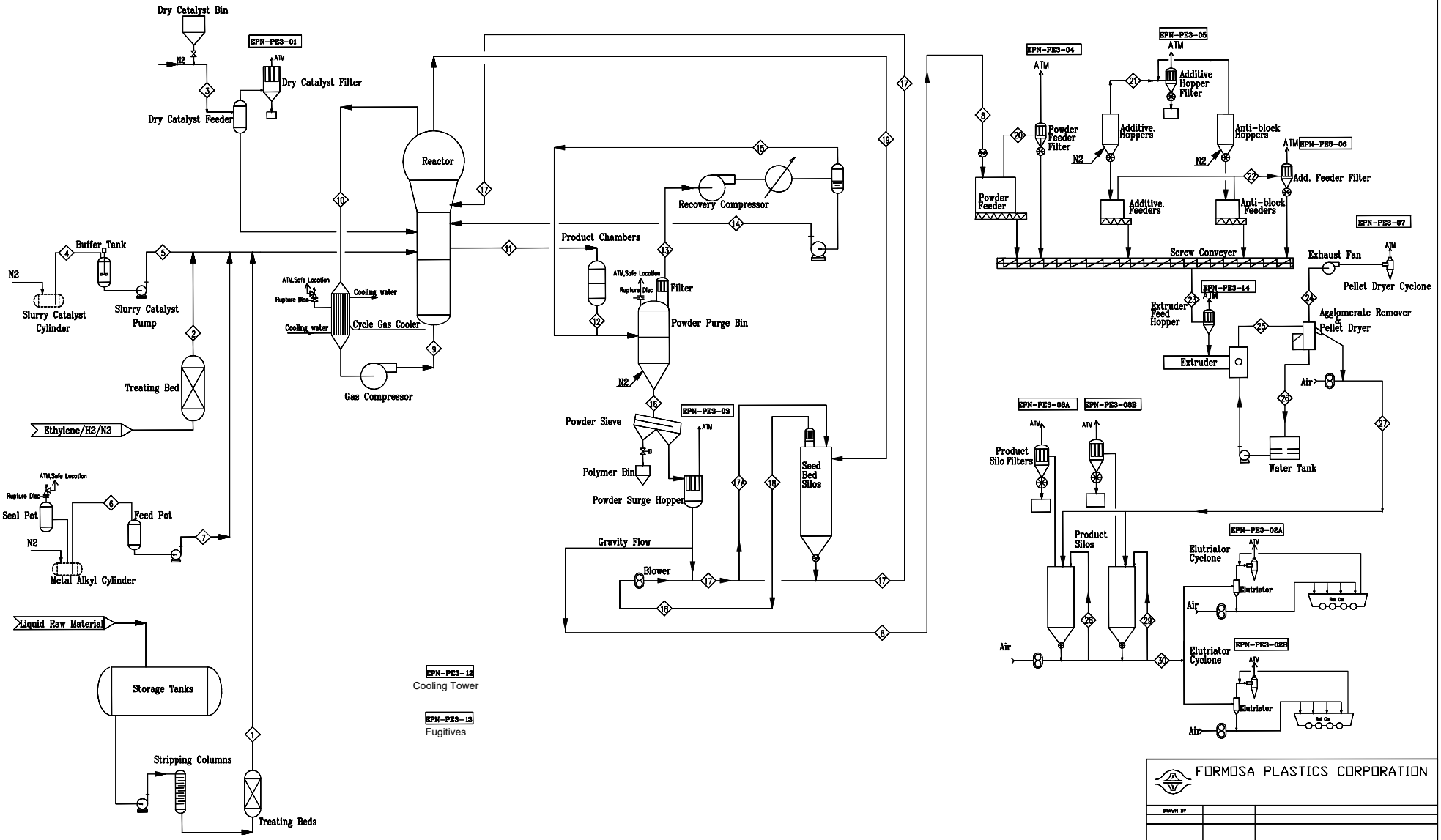
As part of the Hexene Plant expansion, a new unassisted EGF (EPN: PE3-15) is being added at PE3 to operate in parallel with the existing PE3 elevated flare (EPN: PE3-10). The main purposes of the new EGF is to increase the design capacity, including the smokeless design capacity, of the PE3 flare system in order to help control waste gas emissions from the new Hexene Plant. These flare changes are being designed to comply with MON RTR flare requirements.

FPC TX will have the flexibility to route PE3 Plant waste gas from the high-pressure header to the PE3 Plant flare system, which includes the new EGF (EPN: PE3-15) and the existing elevated flare (EPN: PE3-10). PE3 Plant waste gas from the low-pressure header can be routed to either:

1. the PE3 Plant flare system (new EGF EPN: PE3-15 and/or the existing elevated flare EPN PE3-10), and/or,
2. the existing PE3 thermal oxidizers (EPNs: PE3-11A, PE3-11B), and/or,
3. the new Hexene Plant's thermal oxidizer (EPN: HEX-02).

Storage Tanks

Butene, isopentane, and hexene are stored in pressurized storage tanks.



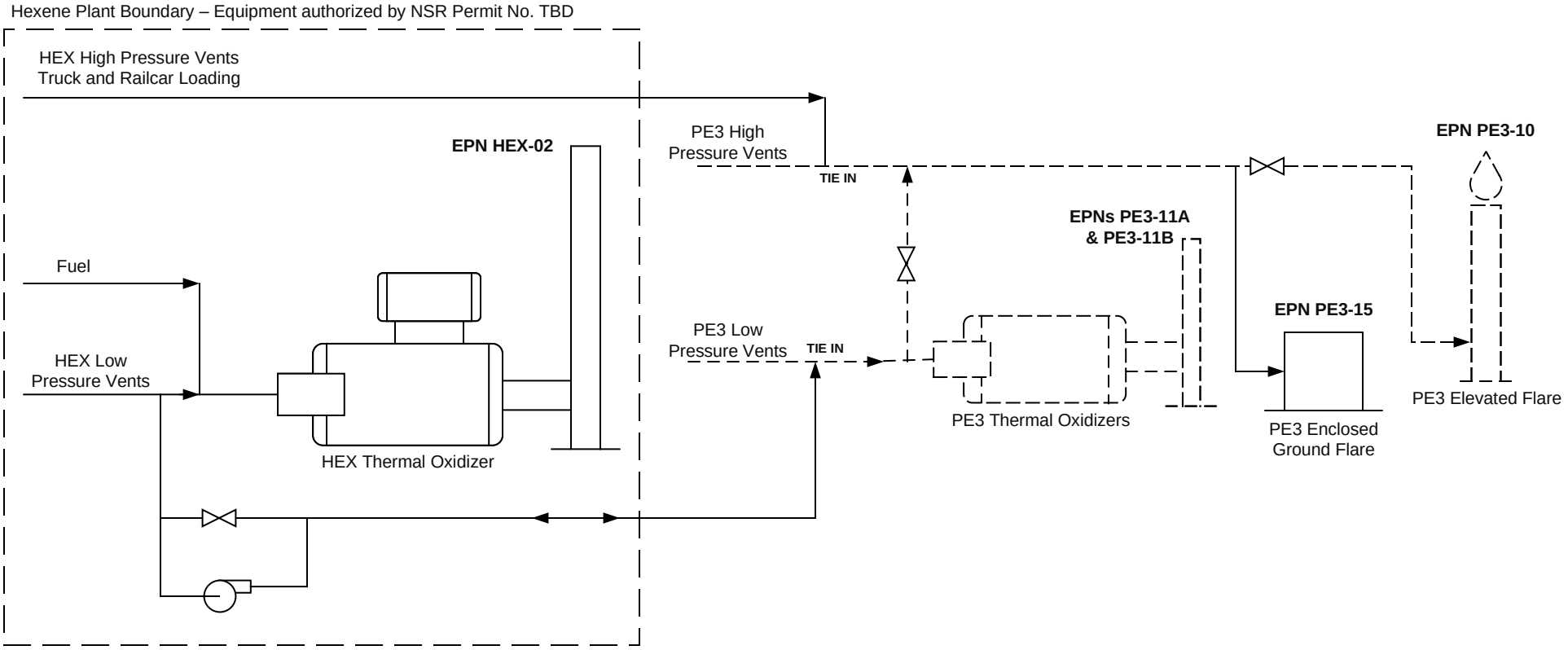
FORMOSA PLASTICS CORPORATION

DRAWN BY

DRAWING DESCRIPTION:

FORMOSA PLASTICS TEXAS

NEW PE LINE PROCESS FLOW DIAGRAM



	PROCESS FLOW DIAGRAM			
POWER ENGINEERS	PE3 Plant – Vent Control System Formosa Plastics Corporation, Texas Page 1 of 1			
	Drafted By: C. Kuhn	**Reviewed By:** J. Parkes	**Project No.:** 179542	**Date:** 09/01/2022

5.0 TITLE V APPLICATION FORMS

General and Administrative Forms
Appendix A of this application includes the general and administrative forms and supporting information required by the SOP significant revision process, 30 TAC 122.220. These forms and other data include the following:

- OP-CRO1 (Certification by Responsible Official);
- OP-1 (Site Information Summary);
- OP-2 (Application for Permit Revision/Renewal); and
- OP-SUMR (Individual Unit Summary for Revisions).

Potentially Applicable Requirements Forms
The emissions units at the PE3 Plant are subject to site-wide applicable requirements as well as unit specific applicability and non-applicability determinations. The following forms are included in Appendix B detailing these requirements:

- Select portions of Form OP-REQ1 (Application Area-Wide Applicability Determinations and General Information);
- OP-REQ2 (Negative Applicable Requirement Determinations); and
- OP-REQ3 (Applicable Requirements Summary).

Unit Attribute Form
Appendix C includes the OP-UA7 (Flare Attributes) unit attribute form.

Major NSR Summary Table
Appendix D includes the updated Major NSR Summary Table.

Public Involvement Plan Form
Appendix E includes the Public Involvement Plan form.

APPENDIX A GENERAL AND ADMINISTRATIVE FORMS

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: RN100218973	CN: CN600130017	Account No.: CB-0038-Q
Permit No.: O4166	Project No.: TBA	
Area Name: PE3 Plant	Company Name: Formosa Plastics Corporation, Texas	

II. Certification Type *(Please mark the appropriate box)*

☐ Responsible Official ☒ Duly Authorized Representative

III. Submittal Type *(Please mark the appropriate box) (Only one response can be accepted per form)*

☐ SOP/TOP Initial Permit Application ☐ Update to Permit Application

☐ GOP Initial Permit Application ☒ Permit Revision, Renewal, or Reopening

☐ Other: _____

IV. Certification of Truth

This certification does not extend to information which is designated by the TCEQ as information for reference only.

I, Mike Rivet certify that I am the DAR
(Certifier Name printed or typed) *(RO or DAR)*

and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:

Note: Enter Either a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).

Time Period: From _____ to _____
Start Date *End Date*

Specific Dates: 05/03/2024 _____ _____ _____ _____ _____
Date 1 *Date 2* *Date 3* *Date 4* *Date 5* *Date 6*

Signature: (Signed in STEERS) Signature Date: _____

Title: Executive Director/Site Manager

Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 1)
Texas Commission on Environmental Quality

Please print or type all information. Direct any questions regarding this application form to the Air Permits Division at (512) 239-1250 or to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division (MC 163), P.O. Box 13087, Austin, Texas 78711-3087.

I.	**Company Identifying Information**
A.	Company Name: Formosa Plastics Corporation, Texas
B.	Customer Reference Number (CN): **CN600130017**
C.	Submittal Date *(mm/dd/yyyy):* 05/03/2024
II.	**Site Information**
A.	Site Name: Formosa Point Comfort Plant
B.	Regulated Entity Reference Number (RN): **RN100218973**
C.	Indicate affected state(s) required to review permit application: *(Check the appropriate box[es].)*
☐ AR ☐ CO ☐ KS ☐ LA ☐ NM ☐ OK ☒ N/A	
D.	Indicate all pollutants for which the site is a major source based on the site's potential to emit: *(Check the appropriate box[es].)*
☒ VOC ☒ NO_X ☒ SO_2 ☒ PM_{10} ☒ CO ☐ Pb ☒ HAPS	
Other: GHGs	
E.	Is the site a non-major source subject to the Federal Operating Permit Program? ☐ YES ☒ NO
F.	Is the site within a local program area jurisdiction? ☐ YES ☒ NO
G.	Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? ☐ YES ☒ NO
H.	Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:
III.	**Permit Type**
A.	Type of Permit Requested: *(Select only one response)*
☒ Site Operating Permit (SOP) ☐ Temporary Operating Permit (TOP) ☐ General Operating Permit (GOP)	

Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 2)
Texas Commission on Environmental Quality

IV.	**Initial Application Information** *(Complete for Initial Issuance Applications Only.)*	
A.	Is this submittal an abbreviated or a full application?	☐ Abbreviated ☐ Full
B.	If this is a full application, is the submittal a follow-up to an abbreviated application?	☐ YES ☐ NO
C.	If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit?	☐ YES ☐ NO
D.	Has an electronic copy of this application been submitted (or is being submitted) to EPA? (Refer to the form instructions for additional information.)	☐ YES ☐ NO
E.	Has the required Public Involvement Plan been included with this application?	☐ YES ☐ NO
V.	**Confidential Information**	
A.	Is confidential information submitted in conjunction with this application?	☐ YES ☒ NO
VI.	**Responsible Official (RO) Identifying Information**	
RO Name Prefix: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)		
RO Full Name: Mounger, Ken		
RO Title: Executive Vice President		
Employer Name: Formosa Plastics Corporation, Texas		
Mailing Address: 9 Peach Tree Hill Road		
City: Livingston		
State: New Jersey		
ZIP Code: 07039		
Territory:		
Country: USA		
Foreign Postal Code:		
Internal Mail Code:		
Telephone No.: (973) 716-7205		
Fax No.: (973) 994-8005		
Email: TammyL@ftpc.fpcusa.com		

Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 3)
Texas Commission on Environmental Quality

VII. Technical Contact Identifying Information *(Complete if different from RO.)*	
Technical Contact Name Prefix: (☐ Mr. ☐ Mrs. ☒ Ms. ☐ Dr.)	
Technical Contact Full Name: Usoff, LeAnn	
Technical Contact Title: Assistant Manager of Air Permitting	
Employer Name: Formosa Plastics Corporation, Texas	
Mailing Address: P.O. Box 700	
City: Point Comfort	
State: Texas	
ZIP Code: 77978	
Territory:	
Country: USA	
Foreign Postal Code:	
Internal Mail Code:	
Telephone No.: (361)-920-9401	
Fax No.:	
Email: LeAnnU@ftpc.fpcusa.com	
VIII. Reference Only Requirements *(For reference only.)*	
A. State Senator: Joan Huffman	
B. State Representative: Geanie W. Morrison	
C. Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)?	☒ YES ☐ NO ☐ N/A
D. Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322?	☒ YES ☐ NO
E. Indicate the alternate language(s) in which public notice is required: Spanish	

Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 4)
Texas Commission on Environmental Quality

IX.	**Off-Site Permit Request** *(Optional for applicants requesting to hold the FOP and records at an off-site location.)*
A.	Office/Facility Name:
B.	Physical Address:
City:	
State:	
ZIP Code:	
Territory:	
Country:	
Foreign Postal Code:	
C.	Physical Location:
D.	Contact Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
Contact Full Name:	
E.	Telephone No.:
X.	**Application Area Information**
A.	Area Name: PE3 Plant
B.	Physical Address: 201 Formosa Drive
City: Point Comfort	
State: Texas	
ZIP Code: 77978	
C.	Physical Location:
D.	Nearest City:
E.	State:
F.	ZIP Code:

Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 5)
Texas Commission on Environmental Quality

X.	**Application Area Information *(continued)***
G.	Latitude (nearest second): 28° 41’ 20”
H.	Longitude (nearest second): -96°32’50”
I.	Are there any emission units that were not in compliance with the applicable requirements identified in the application at the time of application submittal? ☐ YES ☒ NO
J.	Indicate the estimated number of emission units in the application area: 20
K.	Are there any emission units in the application area subject to the Acid Rain Program? ☐ YES ☒ NO
XI.	**Public Notice** *(Complete this section for SOP Applications and Acid Rain Permit Applications only.)*
A.	Name of a public place to view application and draft permit: Calhoun County Library / Jackson County Memorial Library
B.	Physical Address: 200 W Mahan Street / 411 N. Wells Street
City: Port Lavaca / Edna	
ZIP Code: 77979 / 77957	
C.	Contact Person (Someone who will answer questions from the public during the public notice period):
Contact Name Prefix: (☐ Mr. ☐ Mrs. ☒ Ms. ☐ Dr.):	
Contact Person Full Name: Usoff, LeAnn	
Contact Mailing Address: P.O. Box 700	
City: Point Comfort	
State: Texas	
ZIP Code: 77978	
Territory:	
Country:	
Foreign Postal Code:	
Internal Mail Code:	
Telephone No.: (361)-920-9401	

Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 6)
Texas Commission on Environmental Quality

XII. Delinquent Fees and Penalties
Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of Attorney General on behalf of the TCEQ are paid in accordance with the "Delinquent Fee and Penalty Protocol."
Complete Sections XIII and XIV for Acid Rain Permit and CSAPR applications only. Please include a copy of the Certificate of Representation submitted to EPA.
XIII. Designated Representative (DR) Identifying Information
DR Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
DR Full Name:
DR Title:
Employer Name:
Mailing Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.:
Fax No.:
Email:

Complete Sections XIII and XIV for Acid Rain Permit and CSAPR applications only. Please include a copy of the Certificate of Representation submitted to EPA.
XIV. Alternate Designated Representative (ADR) Identifying Information
ADR Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
ADR Full Name:
ADR Title:
Employer Name:
Mailing Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.:
Fax No.:
Email:

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

Date: 05/03/2024	
Permit No.: O4166	
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?	☒ 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	☒ 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 (Complete this section if the permit revision is due to a change at the site or change in regulations.)						
Indicate all pollutants for which the site is a major source based on the site's potential to emit: *(Check the appropriate box[es].)*						
☒ VOC	☒ NO_X	☒ SO_2	☒ PM_{10}	☒ CO	☐ Pb	☒ HAP
Other: GHGs						
IV. Reference Only Requirements *(For reference only)*						
Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)?					☒ YES ☐ NO ☐ N/A	
V. Delinquent Fees and Penalties						
Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.						

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

Date: 05/03/2024
Permit No.: O4166
Regulated Entity No.: RN100218973
Company Name: Formosa Plastics Corporation, Texas

Using the table below, provide a description of the revision.

Revision No.	Revision Code	Unit/Group		Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
1	SIG-D	NO	PE3-13	OP-REQ3	127838, PSDTX1588M1	Revise fugitive component counts (and emissions) for new piping. Some components subject to NSPS Subpart DDD and MON MACT Subpart FFFF.
2	SIG-D	YES	PE3-15	OP-UA7	127838, PSDTX1588M1	New unassisted enclosed ground flare (EGF) to control PE3 plant waste gas. EGF is subject to 30 TAC Chapter 111, NSPS Subpart A, and MACT Subparts A and FFFF.
3	SIG-D	YES	VENTPE3-15	OP-REQ3	127838, PSDTX1588M1	PE3 vent stream authorized for control by PE3-15 EGF, subject to NSPS Subpart DDD and MON MACT Subpart FFFF.

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

Date: 05/03/2024
Permit No.: O4166
Regulated Entity No.: RN100218973
Company Name: Formosa Plastics Corporation, Texas

Using the table below, provide a description of the revision.

Revision No.	Revision Code		Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
4	SIG-D	YES	VNTHEX-02	OP-REQ3	127838, PSDTX1588M1	PE3 vent stream authorized for control by HEX-02 thermal oxidizer located at Hexene Plant. Vent stream is subject to NSPS Subpart DDD and MON MACT Subpart FFFF.
5	SIG-D	NO	PE3-12	OP-SUMR	127838, PSDTX1588M1	Addition of one new cell to PE3 cooling tower, increasing emissions of PM, PM10, and VOC
6	SIG-D	NO	PE3-10	OP-UA7	127838, PSDTX1588M1	Address new MON MACT Requirements in Subpart FFFF for PE3 elevated flare. Update citations for NSPS Subpart A and MACT Subpart A.
7	SIG-D	NO	PE3 UNIT	OP-REQ3	127838, PSDTX1588M1	Address new MON MACT Requirements in Subpart FFFF for PE3 CMPU.
8	SIG-D	YES	PE3-PRD	OP-REQ3	127838, PSDTX1588M1	Address pressure relief device MON MACT Subpart FFFF requirements for pressure relief devices routed to control device or process.

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

Date: 05/03/2024
Permit No.: O4166
Regulated Entity No.: RN100218973
Company Name: Formosa Plastics Corporation, Texas

Using the table below, provide a description of the revision.

Revision No.	Revision Code	Unit/Group		Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
9	SIG-D	YES	PE3-MV	OP-REQ3	127838, PSDTX1588M1	Address maintenance vent MON MACT Subpart FFFF requirements.
10	SIG-D	YES	PE3-BL	OP-REQ3	127838, PSDTX1588M1	Address bypass line MON MACT Subpart FFFF requirements.
11	SIG-D	YES	PE3-SVD	OP-REQ2	127838, PSDTX1588M1	Address storage vessel degassing MON MACT Subpart FFFF permit shield.
12	SIG-D	NO	VENTPE3-10	OP-REQ3	127838, PSDTX1588M1	Update MON MACT Subpart FFFF citations, and add permit shield for Chapter 115, Vent Gas Control.
13	SIG-D	NO	PE3 HTXCHG	OP-REQ2	127838, PSDTX1588M1	Update permit shield for Post-MON RTR (MACT Subpart FFFF) changes.

Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 3
Texas Commission on Environmental Quality

Date: 05/03/2024		
Permit No.: O4166		
Regulated Entity No.: RN100218973		
Company Name: Formosa Plastics Corporation, Texas		
I.	**Significant Revision** *(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)*	
A.	Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322?	☒ YES ☐ NO
B.	Indicate the alternate language(s) in which public notice is required: Spanish	
C.	Will, there be a change in air pollutant emissions as a result of the significant revision?	☒ YES ☐ NO

Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 3
Texas Commission on Environmental Quality

Using the table below, indicate the air pollutant(s) that will be changing and include a brief description of the change in pollutant emissions for each pollutant:

Pollutant	Description of the Change in Pollutant Emissions
Carbon Monoxide (CO)	Increase in hourly and annual emissions
Nitrous Oxide (NOx)	Increase in hourly and annual emissions
Sulfur Dioxide (SO2)	Increase in hourly and annual emissions
Volatile Organic Compounds (VOC)	Increase in hourly and annual emissions
Particulate Matter (PM)	Increase in hourly and annual emissions
Particulate Matter (PM10)	Increase in hourly and annual emissions
Particulate Matter (PM2.5)	Increase in hourly and annual emissions
Chlorine Compounds (HOCl, HCl)	Represent as Chlorine Compounds rather than just HOCl

Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR
Table 1

Date	Permit No.	Regulated Entity No.
05/03/2024	O4166	RN100218973

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
	1	PE3-13	OP-REQ3	Fugitives		127838	PSDTX1588M1
A	2	PE3-15	OP-UA7	Enclosed Ground Flare		127838	PSDTX1588M1
A	3	VENTPE3-15	OP-REQ3	Vent to Enclosed Ground Flare		127838	PSDTX1588M1
A	4	VNTHEX-02	OP-REQ3	Vent to Hexene Plant Thermal Oxidizer		127838	PSDTX1588M1
	5	PE3-12	OP-SUMR	Cooling Tower		127838	PSDTX1588M1
	6	PE3-10	OP-UA7	Flare		127838	PSDTX1588M1
	7	PE3 UNIT	OP-REQ3	MCPU PE3 Process		127838	PSDTX1588M1
A	8	PE3-PRD	OP-REQ3	Pressure Relief Device (PRD) Requirements Post MON RTR		127838	PSDTX1588M1
A	9	PE3-MV	OP-REQ3	Maintenance Vent (MV) Requirements Post MON RTR		127838	PSDTX1588M1

Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR
Table 1

Date	Permit No.	Regulated Entity No.
05/03/2024	O4166	RN100218973

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
A	10	PE3-BL	OP-REQ3	Bypass Line (BL) Requirements Post MON RTR		127838	PSDTX1588M1
A	11	PE3-SVD	OP-REQ2	Storage Vessel Degassing (SVD) Requirements Post MON RTR		127838	PSDTX1588M1
	12	VENTPE3-10	OP-REQ3	Vent to Flare		127838	PSDTX1588M1
	13	PE3 HTXCHG	OP-REQ2	Heat Exchange Systems (Cooling Water System)		127838	PSDTX1588M1

APPENDIX B POTENTIALLY APPLICABLE REQUIREMENTS FORMS

Form OP-REQ1: Page 80			
XI.	**Miscellaneous (continued)**		
	G.	**40 CFR Part 97, Subpart FFFFF - Texas SO_2 Trading Program**	
	1.	The application area includes emission units complying with the requirements of the Texas SO_2 Trading Program. *If the response to Question XI.G.1 is "NO," go to Question XI.G.6.*	☐YES ☐NO
	2.	The application area includes units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart B for SO_2 and 40 CFR Part 75, Subpart H for heat input.	☐YES ☐NO
	3.	The application area includes gas or oil-fired units that are complying with the monitoring requirements of 40 CFR Part 75, Appendix D for SO_2 and heat input.	☐YES ☐NO
	4.	The application area includes gas or oil-fired units that are complying with the Low Mass Emissions monitoring requirements of 40 CFR § 75.19 for SO_2 and heat input.	☐YES ☐NO
	5.	The application area includes units that are complying with EPA-approved alternative monitoring system requirements of 40 CFR Part 75, Subpart E for SO_2 and heat input.	☐YES ☐NO
	6.	The application area includes emission units that qualify for the Texas SO_2 Trading Program retired unit exemption.	☐YES ☐NO
	H.	**Permit Shield (SOP Applicants Only)**	
	1.	A permit shield for negative applicability entries on Form OP-REQ2 (Negative Applicable Requirement Determinations) is being requested or already exists in the permit.	☒YES ☐NO

Form OP-REQ1: Page 83				
XI.	**Miscellaneous (continued)**			
	L.	**Compliance Assurance Monitoring**		
♦		1.	The application area includes at least one unit that does not meet the CAM exemptions in 40 CFR § 64.2(b) for all applicable requirements that it is subject to, and the unit has a pre-control device potential to emit greater than or equal to the amount in tons per year required in a site classified as a major source. *If the response to Question XI.L.1 is "NO," go to Section XI.M.*	☐YES ☒NO
♦		2.	The unit or units defined by XI.L.1 are using a control device to comply with an applicable requirement. *If the response to Question XI.L.2 is "NO," go to Section XI.M.*	☐YES ☐NO
♦		3.	The permit holder has submitted a CAM proposal on Form OP-MON in a previous application.	☐YES ☐NO
♦		4.	The owner/operator or permit holder is submitting a CAM proposal on Form OP-MON according to the deadlines for submittals in 40 CFR § 64.5 in this application. *If the responses to Questions XI.L.3 and XI.L.4 are both "NO," go to Section XI.M.*	☐YES ☐NO
		5.	The owner/operator or permit holder is submitting a CAM implementation plan and schedule to be incorporated as enforceable conditions in the permit.	☐YES ☐NO
		6.	Provide the unit identification numbers for the units for which the applicant is submitting a CAM implementation plan and schedule in the space below.	
♦		7.	At least one unit defined by XI.L.1 and XI.L.2 is using a CEMS, COMS or PEMS meeting the requirements of 40 CFR § 64.3(d)(2).	☐YES ☐NO
♦		8.	All units defined by XI.L.1 and XI.L.2 are using a CEMS, COMS or PEMS meeting the requirements of 40 CFR § 64.3(d)(2). *If the response to Question XI.L.8 is "YES," go to Section XI.M.*	☐YES ☐NO

Form OP-REQ1: Page 85			
XII. New Source Review (NSR) Authorizations (continued)			
	B. Air Quality Standard Permits		
♦	1.	The application area includes at least one Air Quality Standard Permit NSR authorization. *If the response to XII.B.1 is "NO," go to Section XII.C. If the response to XII.B.1 is "YES," be sure to include the standard permit's registration numbers in Section XII.H and answer XII.B.2 - B.16 as appropriate.*	☒YES ☐NO
♦	2.	The application area includes at least one "State Pollution Control Project" Air Quality Standard Permit NSR authorization under 30 TAC § 116.617.	☐YES ☒NO
♦	3.	The application area includes at least one non-rule Air Quality Standard Permit for Pollution Control Projects NSR authorization.	☒YES ☐NO
♦	4.	The application area includes at least one "Installation and/or Modification of Oil and Gas Facilities" Air Quality Standard Permit NSR authorization under 30 TAC § 116.620.	☐YES ☒NO
♦	5.	The application area includes at least one non-rule Air Quality Standard Permit for Oil and Gas Handling and Production Facilities NSR authorization.	☐YES ☒NO
♦	6.	The application area includes at least one "Municipal Solid Waste Landfill" Air Quality Standard Permit NSR authorization under 30 TAC § 116.621.	☐YES ☒NO
♦	7.	The application area includes at least one "Municipal Solid Waste Landfill Facilities and Transfer Stations" Standard Permit authorization under 30 TAC Chapter 330, Subchapter U.	☐YES ☒NO
	8.	The application area includes at least one "Concrete Batch Plant" Air Quality Standard Permit NSR authorization.	☐YES ☒NO
♦	9.	The application area includes at least one "Concrete Batch Plant with Enhanced Controls" Air Quality Standard Permit NSR authorization.	☐YES ☒NO
♦	10.	The application area includes at least one "Hot Mix Asphalt Plant" Air Quality Standard Permit NSR authorization.	☐YES ☒NO

Form OP-REQ1: Page 86			
XII. New Source Review (NSR) Authorizations (continued)			
	B.	**Air Quality Standard Permits (continued)**	
♦	11.	The application area includes at least one "Rock Crusher" Air Quality Standard Permit NSR authorization.	☐YES ☒NO
♦	12.	The application area includes at least one "Electric Generating Unit" Air Quality Standard Permit NSR authorization. *If the response to XII.B.12 is "NO," go to Question XII.B.15.*	☐YES ☒NO
♦	13.	For purposes of "Electric Generating Unit" Air Quality Standard Permit, the application area is located in the East Texas Region.	☐YES ☐NO
♦	14.	For purposes of "Electric Generating Unit" Air Quality Standard Permit, the application area is located in the West Texas Region.	☐YES ☐NO
♦	15.	The application area includes at least one "Boiler" Air Quality Standard Permit NSR authorization.	☐YES ☒NO
♦	16.	The application area includes at least one "Sawmill" Air Quality Standard Permit NSR authorization.	☐YES ☒NO
	C.	**Flexible Permits**	
	1.	The application area includes at least one Flexible Permit NSR authorization.	☐YES ☐NO
	D.	**Multiple Plant Permits**	
	1.	The application area includes at least one Multi-Plant Permit NSR authorization.	☐YES ☐NO

Form OP-REQ1: Page 87			
XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)			
E. PSD Permits and PSD Major Pollutants			
PSD Permit No.: PSDTX1588M1	Issuance Date: 09/22/2023	Pollutant(s): VOC	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
If PSD Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html.			
F. Nonattainment (NA) Permits and NA Major Pollutants			
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 application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html.			
G. NSR Authorizations with FCAA § 112(g) Requirements			
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
♦ **H. Title 30 TAC Chapter 116 Permits, Special Permits, Standard Permits, Other Authorizations (Other Than Permits By Rule, PSD Permits, NA Permits) for the Application Area**			
Authorization No.: 127838	Issuance Date: 09/22/2023	Authorization No.: 172616	Issuance Date: 05/18/23
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:

Form OP-REQ2
Negative Applicable/Superseded Requirement Determinations
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
05/03/2024	O4166	RN100218973

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
A	2	PE3-15	OP-UA7	Chapter 115, Vent Gas Control	§ 115.122	Jackson County is not a listed county in 30 TAC 115.122 control requirements for vent gas control. Jackson County is not subject to vent gas control requirements for VOC.
A	3	VENTPE3-15	OP-REQ3	Chapter 115, Vent Gas Control	§ 115.122	Jackson County is not a listed county in 30 TAC 115.122 control requirements for vent gas control. Jackson County is not subject to vent gas control requirements for VOC.
A	4	VNTHEX-02	OP-REQ3	Chapter 115, Vent Gas Control	§ 115.122	Jackson County is not a listed county in 30 TAC 115.122 control requirements for vent gas control. Jackson County is not subject to vent gas control requirements for VOC.
A	11	PE3-SVD	OP-REQ2	MACT FFFF	§ 63.2470(f) MON Table 4 Item 1	Storage vessel degassing requirements do not apply because there are no Group 1 storage tanks, as defined in § 63.2550 and specified in MON Table 4 Item 1.

Form OP-REQ2
Negative Applicable/Superseded Requirement Determinations
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
05/03/2024	O4166	RN100218973

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
A	12	VENTPE3-10	OP-REQ3	Chapter 115, Vent Gas Control	§ 115.122	Jackson County is not a listed county in 30 TAC 115.122 control requirements for vent gas control. Jackson County is not subject to vent gas control requirements for VOC.
A	13	PE3 HTXCHG	OP-REQ2	MACT FFFF	§ 63.2550	Heat exchange systems (cooling water system) are not in organic HAP service, as defined in § 63.2550, as they are used to cool process fluids that contain less than 5 percent by weight of total organic HAP.
D	13	PE3 HTXCHG	OP-REQ2	MACT F	40 CFR 63, Subpart F, Table 4 and 63.104(a)(5)	Heat exchange systems (cooling water system) are used to cool process fluids that contain less than 5 percent by weight of Table 4 HAPs.

Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program

Table 1a: Additions

Date:	5/3/2024	**Regulated Entity No.:**	RN100218973	**Permit No.:**	O4166
Company Name:	Formosa Plastics Corporation, Texas	**Area Name:**	PE3 Plant		

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
1	PE3-13	OP-REQ3	63FFFF-3	HAPS	MACT FFFF	§63.2480(a) §63.2480(b) MON Table 6
2	PE3-15	OP-UA7	R1111-1	PM (Opacity)	Chapter 111	§111.111(a)(4)(A)|1
2	PE3-15	OP-UA7	60A-1	PM (Opacity)	NSPS A	§60.18(b) §60.18(c)(1) §60.18(c)(2) §60.18(c)(3)(ii) §60.18(c)(4)(iii) §60.18(c)(6) §60.18(e)
2	PE3-15	OP-UA7	63A-1	PM (Opacity)	MACT A	§63.11(b)(4) §63.11(b)(1) §63.11(b)(2) §63.11(b)(3) §63.11(b)(5) §63.11(b)(6)(ii) §63.11(b)(7)(iii)
2	PE3-15	OP-UA7	63FFFF-4	HAPS	MACT FFFF	[G]§63.2450(e)(5) [G]§63.2450(k) [G]§63.670
3	VENTPE3-15	OP-REQ3	60DDD-1	VOC/TOC	NSPS DDD	See 40 CFR 63 FFFF requirements.

Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program

Table 1a: Additions

Date:	5/3/2024	**Regulated Entity No.:**	RN100218973	**Permit No.:**	O4166
Company Name:	Formosa Plastics Corporation, Texas	**Area Name:**	PE3 Plant		

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
3	VENTPE3-15	OP-REQ3	63FFFF-1	HAPS	MACT FFFF	§63.2455(a)-Table 1.1.a.ii §63.11(b) §63.2450(b) §63.2455(a) §63.2455(b) §63.2455(b)(1) §63.982(b) §63.983(a)(1) §63.983(a)(2)
3	VENTPE3-15	OP-REQ3	63FFFF-1 (Continued)	HAPS	MACT FFFF	§63.983(d)(1) §63.983(d)(1)(i) [G]§63.983(d)(2) §63.983(d)(3) §63.987(a) §63.987(b)(1) §63.987(b)(3) [G]§63.997(c)(1) §63.997(c)(3) [G]§63.2450(e)(5) [G]§63.2450(k) [G]§63.670
3	VENTPE3-15	OP-REQ3	63FFFF-1	VOC/TOC	MACT FFFF	§63.2535(h)
4	VNTHEX-02	OP-REQ3	60DDD-1	VOC/TOC	NSPS DDD	See 40 CFR 63 FFFF requirements.

Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program

Table 1a: Additions

Date:	5/3/2024	**Regulated Entity No.:**	RN100218973	**Permit No.:**	O4166
Company Name:	Formosa Plastics Corporation, Texas	**Area Name:**	PE3 Plant		

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
4	VNTHEX-02	OP-REQ3	63FFFF-2	HAPS	MACT FFFF	§63.2455(a)-Table 1.1.a.i §63.2450(b) §63.2450(i)(1) §63.2450(i)(2) §63.2455(a) §63.2455(b) §63.2455(b)(1) §63.982(c) §63.982(c)(2)
4	VNTHEX-02	OP-REQ3	63FFFF-2 (Continued)	HAPS	MACT FFFF	§63.983(a)(1) §63.983(a)(2) §63.983(d)(1) §63.983(d)(1)(i) [G]§63.983(d)(2) §63.983(d)(3) §63.988(a)(1) §63.988(a)(2) §63.996(c)(1)
4	VNTHEX-02	OP-REQ3	63FFFF-2 (Continued)	HAPS	MACT FFFF	§63.996(c)(2) §63.996(c)(2)(i) §63.996(c)(3) §63.996(c)(4) §63.996(c)(5) §63.996(c)(6) [G]§63.997(c)(1) §63.997(c)(3) [G]§63.997(d)

Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program

Table 1a: Additions

Date:	5/3/2024	**Regulated Entity No.:**	RN100218973	**Permit No.:**	O4166
Company Name:	Formosa Plastics Corporation, Texas	**Area Name:**	PE3 Plant		

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
4	VNTHEX-02	OP-REQ3	63FFFF-2	VOC/TOC	MACT FFFF	§63.2535(h)
6	PE3-10	OP-UA7	60A-1	PM (Opacity)	NSPS A	§60.18(b) §60.18(c)(1) §60.18(c)(2) §60.18(c)(3)(ii) §60.18(c)(4)(iii) §60.18(c)(6) §60.18(e)
6	PE3-10	OP-UA7	63A-1	PM (Opacity)	MACT A	§63.11(b)(4) §63.11(b)(1) §63.11(b)(2) §63.11(b)(3) §63.11(b)(5) §63.11(b)(6)(ii) §63.11(b)(7)(iii)
6	PE3-10	OP-UA7	63FFFF-4	HAPS	MACT FFFF	[G]§63.2450(e)(5) [G]§63.2450(k) [G]§63.670 As per AMOC No. 224 issued by TCEQ on July 13, 2023, the effective date for SOP Index No. 63FFFF-5 requirements is August 12, 2024.
7	PE3 UNIT	OP-REQ3	63FFFF-5	HAPS	MACT FFFF	§63.2440(a) §63.2450(a)(2) and MON Tables 1 and 6 §64.2450(c)(2) §63.2450(e)(4) §63.2450(h) §63.2450(l) §63.2450(r) §63.2450(u) §63.2455(a) and MON Table 1 §63.2480(a) and MON Table 6

Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program

Table 1a: Additions

Date: 5/3/2024	**Regulated Entity No.:** RN100218973	**Permit No.:** O4166
Company Name: Formosa Plastics Corporation, Texas	**Area Name:** PE3 Plant	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
8	PE3-PRD	OP-REQ3	63FFFF-8	HAPS	MACT FFFF	§63.2480(e)(4)(i) §63.2480(e)(4)(ii)
9	PE3-MV	OP-REQ3	63FFFF-6	HAPS	MACT FFFF	[G]§63.2450(v)
10	PE3-BL	OP-REQ3	63FFFF-7	HAPS	MACT FFFF	§63.2450(e)(6)
12	VENTPE3-10	OP-REQ3	63FFFF-1	HAPS	MACT FFFF	§63.2455(a)-Table 1.1.a.ii §63.11(b) §63.2450(b) §63.2455(a) §63.2455(b) §63.2455(b)(1) §63.982(b) §63.983(a)(1) §63.983(a)(2)
12	VENTPE3-10	OP-REQ3	63FFFF-1 (Continued)	HAPS	MACT FFFF	§63.983(d)(1) §63.983(d)(1)(i) [G]§63.983(d)(2) §63.983(d)(3) §63.987(a) §63.987(b)(1) §63.987(b)(3) [G]§63.997(c)(1) §63.997(c)(3) [G]§63.2450(e)(5) [G]§63.2450(k) [G]§63.670

Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program

Table 1b: Additions

Date:	5/3/2024	**Regulated Entity No.:**	RN100218973	**Permit No.:**	O4166
Company Name:	Formosa Plastics Corporation, Texas	**Area Name:**	PE3 Plant		

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
1	PE3-13	63FFFF-3	HAPS	§63.2480(a) §63.2480(b) MON Table 6	§63.2525(a) MON Table 6	§63.2520(a) MON Table 11 §63.2520(e)
2	PE3-15	R1111-1	PM (Opacity)	§111.111(a)(4)(A)(i) §111.111(a)(4)(A)(ii)	§111.111(a)(4)(A)(ii)	None
2	PE3-15	60A-1	PM (Opacity)	§60.18(d) §60.18(f)(1) §60.18(f)(2) §60.18(f)(3) §60.18(f)(4) §60.18(f)(5)	None	None
2	PE3-15	63A-1	PM (Opacity)	§63.11(b)(4) §63.11(b)(5) §63.11(b)(7)(i)	None	None
2	PE3-15	63FFFF-4	HAPS	[G]§63.2450(e)(5) §63.2450(k)(8) [G]§63.670 [G]§63.671	§63.2450(e)(5)(xii) §63.2450(k)(7) [G]§63.2525(m) §63.670(o)(6) §63.670(p)	§63.2450(e)(5)(iv) and (xi) §63.2520(d)(3) [G]§63.2520(e)(11) §63.670(q) MON Table 11
3	VENTPE3-15	60DDD-1	VOC/TOC	See 40 CFR 63 FFFF requirements.	See 40 CFR 63 FFFF requirements.	See 40 CFR 63 FFFF requirements.

Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program

Table 1b: Additions

Date:	5/3/2024	**Regulated Entity No.:**	RN100218973	**Permit No.:**	O4166
Company Name:	Formosa Plastics Corporation, Texas	**Area Name:**	PE3 Plant		

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
3	VENTPE3-15	63FFFF-1	HAPS	[G]§63.115(d)(2)(v) §63.115(d)(3)(iii) §63.983(b) [G]§63.983(b)(1) [G]§63.983(b)(2) [G]§63.983(b)(3) [G]§63.983(c)(1) §63.983(c)(2) §63.983(c)(3) §63.983(d)(1) §63.983(d)(1)(ii)	§63.2450(f)(2) §63.2450(f)(2)(i) §63.2450(f)(2)(ii) §63.983(b) [G]§63.983(d)(2) §63.987(b)(1) §63.987(c) §63.998(a)(1) [G]§63.998(a)(1)(i) §63.998(a)(1)(ii)	§63.2450(f)(2)(ii) §63.2450(q) §63.987(b)(1) §63.997(c)(3) §63.998(a)(1)(iii)(A) [G]§63.998(b)(3) [G]§63.999(a)(1) [G]§63.999(a)(2) §63.999(b)(5)
3	VENTPE3-15	63FFFF-1 (Continued)	HAPS	[G]§63.987(b)(3)(i) §63.987(b)(3)(ii) §63.987(b)(3)(iii) §63.987(b)(3)(iv) §63.987(c) §63.997(a) [G]§63.997(c)(1) §63.997(c)(2) §63.997(c)(3) §63.997(c)(3)(i) §63.997(c)(3)(ii) [G]§63.2450(e)(5) §63.2450(k)(8) [G]§63.670 [G]§63.671	§63.998(a)(1)(iii)(A) §63.998(a)(1)(iii)(B) [G]§63.998(b)(1) [G]§63.998(b)(2) [G]§63.998(b)(3) [G]§63.998(b)(5) [G]§63.998(d)(1) §63.998(d)(3)(i) §63.998(d)(3)(ii) §63.998(d)(5) §63.2450(e)(5)(xii) §63.2450(k)(7) [G]§63.2525(m) §63.670(o)(6) §63.670(p)	§63.999(c)(1) §63.999(c)(2)(i) §63.999(c)(3) §63.999(c)(6) [G]§63.999(c)(6)(i) §63.999(c)(6)(iv) [G]§63.999(d)(1) [G]§63.999(d)(2) §63.2450(e)(5)(iv) and (xi) §63.2520(d)(3) [G]§63.2520(e)(11) §63.670(q) MON Table 11
3	VENTPE3-15	63FFFF-1	VOC/TOC	§63.2535(h)	§63.2535(h)	§63.2535(h)
4	VNTHEX-02	60DDD-1	VOC/TOC	See 40 CFR 63 FFFF requirements.	See 40 CFR 63 FFFF requirements.	See 40 CFR 63 FFFF requirements.

Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program

Table 1b: Additions

Date:	5/3/2024	**Regulated Entity No.:**	RN100218973	**Permit No.:**	O4166
Company Name:	Formosa Plastics Corporation, Texas	**Area Name:**	PE3 Plant		

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
4	VNTHEX-02	63FFFF-2	HAPS	[G]§63.115(d)(2)(v) §63.115(d)(3)(iii) §63.2450(g) §63.2450(g)(1) §63.2450(g)(2) [G]§63.2450(g)(3) §63.2450(g)(4) §63.2450(k)(6) §63.983(b) [G]§63.983(b)(1) [G]§63.983(b)(2) [G]§63.983(b)(3) [G]§63.983(c)(1) §63.983(c)(2)	§63.2450(k)(6) §63.2525(g) §63.2525(h) §63.983(b) [G]§63.983(d)(2) §63.988(b)(1) §63.996(c)(2)(ii) §63.998(a)(2)(i)	§63.2450(q) §63.988(b)(1) §63.996(b)(2) §63.996(c)(6) §63.997(c)(3) §63.998(a)(2)(ii)(A)
4	VNTHEX-02	63FFFF-2 (Continued)	HAPS	§63.983(c)(3) §63.983(d)(1) §63.983(d)(1)(ii) §63.988(b)(1) §63.988(c)(1) §63.996(b)(1) §63.996(b)(1)(i) §63.996(b)(2) §63.997(a) [G]§63.997(c)(1) §63.997(c)(2) §63.997(c)(3) §63.997(c)(3)(iii) [G]§63.997(d)	§63.998(a)(2)(ii)(A) §63.998(a)(2)(ii)(B)(1) §63.998(a)(2)(ii)(B)(4) [G]§63.998(b)(1) [G]§63.998(b)(2) [G]§63.998(b)(3) [G]§63.998(b)(5)	[G]§63.998(b)(3) [G]§63.999(a)(1) [G]§63.999(a)(2) [G]§63.999(b)(3) §63.999(b)(5)
4	VNTHEX-02	63FFFF-2 (Continued)	HAPS	§63.997(e) §63.997(e)(1)(i) [G]§63.997(e)(1)(iv) [G]§63.997(e)(1)(v) §63.997(e)(2) §63.997(e)(2)(i) §63.997(e)(2)(i)(B) §63.997(e)(2)(ii) §63.997(e)(2)(iii) §63.997(e)(2)(iii)(A) [G]§63.997(e)(2)(iii)(B) [G]§63.997(e)(2)(iii)(C) [G]§63.997(e)(2)(iii)(D) [G]§63.997(e)(2)(iii)(E)	[G]§63.998(c)(1) §63.998(c)(2)(iii) §63.998(c)(3)(iii) [G]§63.998(d)(1) §63.998(d)(3)(i) §63.998(d)(3)(ii) §63.998(d)(5)	§63.999(c)(1) §63.999(c)(2)(i) §63.999(c)(6) [G]§63.999(c)(6)(i) §63.999(c)(6)(iv) MON Table 11

Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program

Table 1b: Additions

Date:	5/3/2024	**Regulated Entity No.:**	RN100218973	**Permit No.:**	O4166
Company Name:	Formosa Plastics Corporation, Texas	**Area Name:**	PE3 Plant		

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
4	VNTHEX-02	63FFFF-2	VOC/TOC	§63.2535(h)	§63.2535(h)	§63.2535(h)
6	PE3-10	60A-1	PM (Opacity)	§60.18(d) §60.18(f)(1) §60.18(f)(2) §60.18(f)(3) §60.18(f)(4) §60.18(f)(5)	None	None
6	PE3-10	63A-1	PM (Opacity)	§63.11(b)(4) §63.11(b)(5) §63.11(b)(7)(i)	None	None
6	PE3-10	63FFFF-4	HAPS	[G]§63.2450(e)(5) §63.2450(k)(8) [G]§63.670 [G]§63.671 As per AMOC No. 224 issued by TCEQ on July 13, 2023, the effective date for SOP Index No. 63FFFF-5 requirements is August 12, 2024.	§63.2450(e)(5)(xii) §63.2450(k)(7) [G]§63.2525(m) §63.670(o)(6) §63.670(p) As per AMOC No. 224 issued by TCEQ on July 13, 2023, the effective date for SOP Index No. 63FFFF-5 requirements is August 12, 2024.	§63.2450(e)(5)(iv) and (xi) §63.2520(d)(3) [G]§63.2520(e)(11) §63.670(q) MON Table 11 As per AMOC No. 224 issued by TCEQ on July 13, 2023, the effective date for SOP Index No. 63FFFF-5 requirements is August 12, 2024.
7	PE3 UNIT	63FFFF-5	HAPS	§63.2450(g)(6) §63.2450(g)(7) §63.2450(i)(3) §63.2450(j)(5)(ii)	[G]§63.2450(j)(6) §63.2485(o) §63.2525(a) [G]§63.2525(b) §63.2525(j) [G]§63.2525(l) [G]§63.2525(m) §63.2525(n)	§63.2445(c) §63.2450(g)(5) [G]§63.2450(m) §63.2515(a) §63.2515(b)(2) §63.2515(c) §63.2520(a) §63.2520(b)(3) §63.2520(b)(4) [G]§63.2520(c) §63.2520(d)(2)(ii) [G]§63.2520(d)(5) [G]§63.2520(e) §63.2520(f) §63.2520(g) §63.2520(h) §63.2520(i) MON Table 11

Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program

Table 1b: Additions

Date:	5/3/2024	**Regulated Entity No.:**	RN100218973	**Permit No.:**	O4166
Company Name:	Formosa Plastics Corporation, Texas	**Area Name:**	PE3 Plant		

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
8	PE3-PRD	63FFFF-8	HAPS			
9	PE3-MV	63FFFF-6	HAPS	[G]§63.2450(v)	[G]§63.2525(p)	[G]§63.2520(e)(14) MON Table 11
10	PE3-BL	63FFFF-7	HAPS	§63.2450(e)(6)	§63.2525(n)	§63.2520(e)(12) MON Table 11
12	VENTPE3-10	63FFFF-1	HAPS	[G]§63.115(d)(2)(v) §63.115(d)(3)(iii) §63.983(b) [G]§63.983(b)(1) [G]§63.983(b)(2) [G]§63.983(b)(3) [G]§63.983(c)(1) §63.983(c)(2) §63.983(c)(3) §63.983(d)(1) §63.983(d)(1)(ii)	§63.2450(f)(2) §63.2450(f)(2)(i) §63.2450(f)(2)(ii) §63.983(b) [G]§63.983(d)(2) §63.987(b)(1) §63.987(c) §63.998(a)(1) [G]§63.998(a)(1)(i) §63.998(a)(1)(ii)	§63.2450(f)(2)(ii) §63.2450(q) §63.987(b)(1) §63.997(c)(3) §63.998(a)(1)(iii)(A) [G]§63.998(b)(3) [G]§63.999(a)(1) [G]§63.999(a)(2) §63.999(b)(5)
12	VENTPE3-10	63FFFF-1 (Continued)	HAPS	[G]§63.987(b)(3)(i) §63.987(b)(3)(ii) §63.987(b)(3)(iii) §63.987(b)(3)(iv) §63.987(c) §63.997(a) [G]§63.997(c)(1) §63.997(c)(2) §63.997(c)(3) §63.997(c)(3)(i) §63.997(c)(3)(ii) [G]§63.2450(e)(5) §63.2450(k)(8) [G]§63.670 [G]§63.671	§63.998(a)(1)(iii)(A) §63.998(a)(1)(iii)(B) [G]§63.998(b)(1) [G]§63.998(b)(2) [G]§63.998(b)(3) [G]§63.998(b)(5) [G]§63.998(d)(1) §63.998(d)(3)(i) §63.998(d)(3)(ii) §63.998(d)(5) §63.2450(e)(5)(xii) §63.2450(k)(7) [G]§63.2525(m) §63.670(o)(6) §63.670(p)	§63.999(c)(1) §63.999(c)(2)(i) §63.999(c)(3) §63.999(c)(6) [G]§63.999(c)(6)(i) §63.999(c)(6)(iv) [G]§63.999(d)(1) [G]§63.999(d)(2) §63.2450(e)(5)(iv) and (xi) §63.2520(d)(3) [G]§63.2520(e)(11) §63.670(q) MON Table 11

APPENDIX C UNIT ATTRIBUTE FORM

Texas Commission on Environmental Quality
Flare Attributes
Form OP-UA7 (Page 1)
Federal Operating Permit Program
Table 1: Title 30 Texas Administrative Code Chapter 111 (30 TAC Chapter 111)
Control of Air Pollution from Visible Emissions and Particulate Matter

Date	Permit No.:	Regulated Entity No.
05/03/2024	O4166	RN100218973

Unit ID No.	SOP/GOP Index No	Acid Gases Only	Emergency/Upset Conditions Only	Alternate Opacity Limitation (AOL)	AOL ID No.	Construction Date
PE3-15	R1111-1	NO	NO			

Texas Commission on Environmental Quality
Flare Attributes
Form OP-UA7 (Page 3)
Federal Operating Permit Program
Table 3: Title 40 Code of Federal Regulations Part 60 and 61 (40 CFR Part 60 and 40 CFR Part 61)
Subpart A: General Provisions of Standards of Performance for New Stationary Sources and National Emission Standards for Hazardous Air Pollutants

Date	Permit No.:	Regulated Entity No.
05/03/2024	O4166	RN100218973

Unit ID No.	SOP/GOP Index No.	Subject to 40 CFR §60.18	Adhering to Heat Content Specifications	Flare Assist Type	Flare Exit Velocity	Heating Value of Gas
PE3-15	60A-1	YES	YES	NONE	60-400	1000-
PE3-10	60A-1	YES	YES	STEAM	60-400	1000-

Texas Commission on Environmental Quality
Flare Attributes
Form OP-UA7 (Page 4)
Federal Operating Permit Program
Table 4: Title 40 Code of Federal Regulations Part 63
Subpart A: General Provisions of National Emission Standards for Hazardous Air Pollutants for Source Categories

Date	Permit No.:	Regulated Entity No.
05/03/2024	O4166	RN100218973

Unit ID No.	SOP/GOP Index No.	Required Under 40 CFR Part 63	Heat Content Specification	Flare Assist Type	Flare Exit Velocity	Heating Value of Gas
PE3-15	63A-1	YES	YES	NONE	60-400	1000-
PE3-10	63A-1	YES	YES	STEAM	60-400	1000-

Texas Commission on Environmental Quality
Flare Attributes
Form OP-UA7 (Page 7)
Federal Operating Permit Program
Table 6: Title Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart CC, National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries

Date	Permit No.:	Regulated Entity No.
05/03/2024	O4166	RN100218973

Unit ID No.	SOP Index No.	Flare Applicability	Operating Limits	AMEL ID No.	Flare Tip Velocity	Perimeter Assist Air
PE3-15	63FFFF-4	OTHER	REGOP		60-400	NONE
PE3-10	63FFFF-4	OTHER	REGOP		60-400	NONE

APPENDIX D MAJOR NSR SUMMARY TABLE

Major NSR Summary Table

Permit Numbers: 127838 and PSDTX1588M1					Issuance Date: 05/03/2024		
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)**	**Special Condition/Application Information**	**Special Cond/Application Information**	**Special Condition/Application Information**
PE3-01	Dry Catalyst Filter	PM	<0.01	<0.01	7, 24	7, 24, 30, 34	7
		PM_{10}	<0.01	<0.01			
		$PM_{2.5}$	<0.01	<0.01			
PE3-02A	Elutriator Cyclone A	PM	0.40	1.75	4, 8, 19, 20, 24	4, 8, 19, 20, 24, 34	4, 8, 19
		PM_{10}	0.13	0.56			
		$PM_{2.5}$	0.03	0.15			
		VOC	0.22	(6)			
PE3-02B	Elutriator Cyclone B	PM	0.40	1.75	4, 8, 19, 20, 24	4, 8, 19, 20, 24, 34	4, 8, 19
		PM_{10}	0.13	0.56			
		$PM_{2.5}$	0.03	0.15			
		VOC	0.22	(6)			
PE3-03	Powder Surge Hopper Filter	PM	0.01	0.03	4, 7, 24	4, 7, 24, 30, 34	4, 7
		PM_{10}	0.01	0.03			
		$PM_{2.5}$	0.01	0.03			
		VOC	0.15	0.66			
PE3-04	Powder Feeder Filter	PM	<0.01	0.02	4, 7, 24	4, 7, 24, 30, 34	4, 7
		PM_{10}	<0.01	0.02			
		$PM_{2.5}$	<0.01	0.02			
		VOC	0.10	0.44			

Major NSR Summary Table

Permit Numbers: 127838 and PSDTX1588M1					Issuance Date: 05/03/2024		
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)**	**Special Condition/Application Information**	**Special Cond/Application Information**	**Special Condition/Application Information**
PE3-05	Additive Hopper Filter	PM	0.01	0.02	7, 24	7, 24, 30, 34	7
		PM_{10}	0.01	0.02			
		$PM_{2.5}$	0.01	0.02			
PE3-06	Additive Feeder Filter	PM	<0.01	0.01	7, 24	7, 24, 30, 34	7
		PM_{10}	<0.01	0.01			
		$PM_{2.5}$	<0.01	0.01			
PE3-07	Pellet Dryer Cyclone	PM	0.62	2.73	4, 8, 19, 20, 24	4, 8, 19, 20, 24, 34	4, 8, 19
		PM_{10}	0.01	0.03			
		$PM_{2.5}$	<0.01	0.01			
		VOC	0.97	(6)			
PE3-08A	Product Silo A Filter	PM	0.33	0.73	4, 7, 19, 20, 24	4, 7, 19, 20, 24, 30, 34	4, 7, 19
		PM_{10}	0.33	0.73			
		$PM_{2.5}$	0.33	0.73			
		VOC	0.91	(6)			
PE3-08B	Product Silo B Filter	PM	0.33	0.73	4, 7, 19, 20, 24	4, 7, 19, 20, 24, 30, 34	4, 7, 19
		PM_{10}	0.33	0.73			
		$PM_{2.5}$	0.33	0.73			
		VOC	0.91	(6)			

Major NSR Summary Table

Permit Numbers: 127838 and PSDTX1588M1					Issuance Date: 05/03/2024		
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)**	**Special Condition/Application Information**	**Special Cond/Application Information**	**Special Condition/Application Information**
PE3-10, PE3-15	Elevated Flare or Enclosed Ground Flare Hourly CAP	CO (Elevated Flare Option)	58.52	-	3, 4, 10, 11, 25	3, 4, 10, 11, 25, 34	3, 4, 25
		NO_x (Elevated Flare Option)	11.36	-			
		CO (EGF Option)	92.00	-			
		NO_x (EGF Option)	23.27	-			
		SO_2	<0.01	-			
		VOC	148.05	-			
PE3-10, PE3-15	Elevated Flare or Enclosed Ground Flare Annual CAP	CO	-	7.49	3, 4, 10, 11, 25	3,4, 10,11, 25, 34	3,4, 25
		NO_x	-	2.64			
		SO_2	-	0.01			
		VOC	-	9.74			
PE3-11A, PE3-11B, HEX-02	Thermal Oxidizers A & B, Hexene Plant Thermal Oxidizer	NO_x	2.53	4.12	3, 4, 12, 13, 19, 24	3, 4, 12, 13, 19, 24, 34	3, 4, 12, 13, 19
		PM	0.31	0.51			
		PM_{10}	0.31	0.51			
		$PM_{2.5}$	0.31	0.51			
		CO	3.48	5.66			
		SO_2	0.02	0.01			
		VOC	0.93	2.30			

Major NSR Summary Table

Permit Numbers: 127838 and PSDTX1588M1					Issuance Date: 05/03/2024		
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)**	**Special Condition/Application Information**	**Special Cond/Application Information**	**Special Condition/Application Information**
PE3-12	PE3 Cooling Tower (5)	Chlorine Compounds	<0.01	<0.01	4, 18	4, 18, 34	4
		PM	1.53	4.29			
		PM_{10}	0.36	1.56			
		$PM_{2.5}$	<0.01	0.01			
		VOC	1.18	5.17			
PE3-13	Fugitives (5)	Cl_2	<0.01	0.02	3, 4, 14, 15, 16, 17	3, 4, 14, 15, 16, 17, 34	3, 4, 14
		VOC	12.03	52.68			
PE3-14	Extruder Feed Hopper Filter	PM	<0.01	0.01	4, 7, 24	4, 7, 24, 30, 34	4, 7
		PM_{10}	<0.01	0.01			
		$PM_{2.5}$	<0.01	0.01			
		VOC	0.03	0.15			
PE3-MAINT	PE3 Maintenance Fugitives	VOC	79.04	0.42	4, 26, 27, 28	4, 26, 27, 28, 29, 34	4
		PM	11.96	0.05			
		PM_{10}	6.52	<0.01			
		$PM_{2.5}$	6.52	<0.01			

Major NSR Summary Table

Permit Numbers: 127838 and PSDTX1588M1					Issuance Date: 05/03/2024		
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)**	**Special Condition/Application Information**	**Special Cond/Application Information**	**Special Condition/Application Information**
PE3-10, PE3-15, PE3-TEMP	PE3 Flare System or Temporary Control Device (PE3 MSS Contribution) Hourly CAP	VOC	506.36	-	4, 10, 11, 25, 26, 27, 28, 32, 33	4, 10, 11, 25, 26, 27, 28, 33, 34	4, 25
		NO_x (Elevated Flare Option)	49.04	-			
		CO (Elevated Flare Option)	278.85	-			
		NO_x (EGF Option)	99.51	-			
		CO (EGF Option)	437.51	-			
PE3-10, PE3-15, PE3-TEMP	PE3 Flare System or Temporary Control Device (PE3 MSS Contribution) Annual CAP	VOC	-	4.13	4, 10, 11, 25, 26, 27, 28, 32, 33	4, 10, 11, 25, 26, 27, 28, 33, 34	4, 25
		NO_x	-	2.24			
		CO	-	18.81			
PE3-CAP	Cap for Downstream Pellet Handling VOCs	VOC (6)	-	10.13	4, 5, 6, 9, 20, 21, 22, 23	4, 5, 6, 9, 20, 21, 22, 23, 34	4

(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
NO_x - total oxides of nitrogen
SO_2 - sulfur dioxide
PM - total particulate matter, suspended in the atmosphere, including PM_{10} and $PM_{2.5}$, as represented
PM_{10} - 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
Cl_2 - chlorine
Chlorine Compounds - hypochlorous acid and hydrogen chloride
EGF - Enclosed Ground Flare
(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.
(6) EPN PE3-CAP is representative of the annual cap for downstream pellet handling VOC emissions of the indicated EPNs.

APPENDIX E PUBLIC INVOLVEMENT PLAN FORM

Texas Commission on Environmental Quality

Public Involvement Plan Form for Permit and Registration Applications

The Public Involvement Plan is intended to provide applicants and the agency with information about how public outreach will be accomplished for certain types of applications in certain geographical areas of the state. It is intended to apply to new activities; major changes at existing plants, facilities, and processes; and to activities which are likely to have significant interest from the public. This preliminary screening is designed to identify applications that will benefit from an initial assessment of the need for enhanced public outreach.

All applicable sections of this form should be completed and submitted with the permit or registration application. For instructions on how to complete this form, see TCEQ-20960-inst.

Section 1. Preliminary Screening

☐ New Permit or Registration Application

☒ New Activity – modification, registration, amendment, facility, etc. (see instructions)

If neither of the above boxes are checked, completion of the form is not required and does not need to be submitted.

Section 2. Secondary Screening

☒ Requires public notice,

☐ Considered to have significant public interest, **and**

☐ Located within any of the following geographical locations:

- Austin
- Dallas
- Fort Worth
- Houston
- San Antonio
- West Texas
- Texas Panhandle
- Along the Texas/Mexico Border
- Other geographical locations should be decided on a case-by-case basis

If all the above boxes are not checked, a Public Involvement Plan is not necessary. Stop after Section 2 and submit the form.

☒ Public Involvement Plan not applicable to this application. Provide **brief** explanation.

The Title V revision is not expected to have significant public interest and the facility is not located within one of the geographical locations identified above.

Section 3. Application Information

Type of Application (check all that apply):

Air ☐ Initial ☐ Federal ☐ Amendment ☐ Standard Permit ☐ Title V

Waste ☐ Municipal Solid Waste ☐ Industrial and Hazardous Waste ☐ Scrap Tire
☐ Radioactive Material Licensing ☐ Underground Injection Control

Water Quality

☐ Texas Pollutant Discharge Elimination System (TPDES)

- ☐ Texas Land Application Permit (TLAP)
- ☐ State Only Concentrated Animal Feeding Operation (CAFO)
- ☐ Water Treatment Plant Residuals Disposal Permit

☐ Class B Biosolids Land Application Permit

☐ Domestic Septage Land Application Registration

Water Rights New Permit

☐ New Appropriation of Water

☐ New or existing reservoir

Amendment to an Existing Water Right

☐ Add a New Appropriation of Water

☐ Add a New or Existing Reservoir

☐ Major Amendment that could affect other water rights or the environment

Section 4. Plain Language Summary

Provide a brief description of planned activities.

Section 5. Community and Demographic Information

Community information can be found using EPA's EJ Screen, U.S. Census Bureau information, or generally available demographic tools.

Information gathered in this section can assist with the determination of whether alternative language notice is necessary. Please provide the following information.

(City)

(County)

(Census Tract)
Please indicate which of these three is the level used for gathering the following information.

☐ City ☐ County ☐ Census Tract

(a) Percent of people over 25 years of age who at least graduated from high school

(b) Per capita income for population near the specified location

(c) Percent of minority population and percent of population by race within the specified location

(d) Percent of Linguistically Isolated Households by language within the specified location

(e) Languages commonly spoken in area by percentage

(f) Community and/or Stakeholder Groups

(g) Historic public interest or involvement

Section 6. Planned Public Outreach Activities

(a) Is this application subject to the public participation requirements of Title 30 Texas Administrative Code (30 TAC) Chapter 39?

☐ Yes ☐ No

(b) If yes, do you intend at this time to provide public outreach other than what is required by rule?

☐ Yes ☐ No

If Yes, please describe.

If you answered "yes" that this application is subject to 30 TAC Chapter 39, answering the remaining questions in Section 6 is not required.

(c) Will you provide notice of this application in alternative languages?

☐ Yes ☐ No

Please refer to Section 5. If more than 5% of the population potentially affected by your application is Limited English Proficient, then you are required to provide notice in the alternative language.

If yes, how will you provide notice in alternative languages?

☐ Publish in alternative language newspaper

☐ Posted on Commissioner's Integrated Database Website

☐ Mailed by TCEQ's Office of the Chief Clerk

☐ Other (specify)

(d) Is there an opportunity for some type of public meeting, including after notice?

☐ Yes ☐ No

(e) If a public meeting is held, will a translator be provided if requested?

☐ Yes ☐ No

(f) Hard copies of the application will be available at the following (check all that apply):

☐ TCEQ Regional Office ☐ TCEQ Central Office

☐ Public Place (specify)

Section 7. Voluntary Submittal

For applicants voluntarily providing this Public Involvement Plan, who are not subject to formal public participation requirements.

Will you provide notice of this application, including notice in alternative languages?

☐ Yes ☐ No

What types of notice will be provided?

☐ Publish in alternative language newspaper

☐ Posted on Commissioner's Integrated Database Website

☐ Mailed by TCEQ's Office of the Chief Clerk

☐ Other (specify)

APPENDIX F ALTERNATIVE METHOD OF COMPLIANCE (AMOC) NO 224

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 13, 2023

MS TAMMY WACKER
CORPORATE AIR PERMITTING MANAGER
FORMOSA PLASTICS CORPORATION TEXAS
PO BOX 320
DELAWARE CITY DE 19706-0320

Re: Alternative Method of Compliance (AMOC) No. 224
LDPE and PE3 Unit Flares
MON MACT Extension
Regulated Entity Number: RN100218973
Customer Reference Number: CN600130017
Associated Permit Numbers: 107520, PSDTX1384, and O4286
127838, PSDTX1588, and O4166

Dear Ms. Wacker:

This correspondence is in response to Formosa Plastics Corporation, Texas's (FPC's) April 13, 2023 request for a one-year extension from certain requirements for the LDPE and PE3 Unit Flares to comply with 40 CFR 63, Subpart FFFF Miscellaneous Organic Chemical Manufacturing (MON) rules which has an effective date of August 13, 2023.

LDPE Unit Flare
We understand that the LDPE Unit flare (EPN PLANT-FLR4 in Permit Nos. 107520, PSDTX1384, and O4286) requires installation of a new flare tip to prevent/minimize visible emissions during upsets.

The flare tip will be replaced during the next unit turnaround scheduled for February 2024 and the flare will be in compliance no later than August 12, 2024.

In the interim, the following steps will be taken for the compliant operation of this flare:
- Comply with the 270 BTU/SCF Net Heating Value in the Combustion Zone (NHVcz), all flow measurements, and other details of the MON.
- Operate normally (i.e., no full shutdowns are planned) until the replacement flare tip project takes place.
- Operate with no visible emissions, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.
- If an unplanned operation occurs (such as a startup activity after a severe weather event (e.g., a tropical storm or freezing weather), power outage, or 3rd-party raw material shortage) that may cause excess visible emissions at the flare, the Unit will do its best to prevent or minimize any smoking.

PE3 Unit Flare
We also understand that the PE3 Unit flare (EPN PE3-10 in Permit Nos. 127838, PSDTX1588, and O4166) needs two flow meters (vent gas flow meter and steam flow meter) installed to be able to demonstrate that the Net Heating Value Combustion Zone (NHVcz) is at or above the 270 BTU/scf standard in all flow situations. Additionally, the company is proactively installing a new flare tip to prevent and minimize visible emission events during extreme upset events.

The flare tip and flow meters are expected to occur when either a temporary flare can be constructed and safely operated or the next scheduled unit turnaround in April 2024 (whichever occurs first). The flare will be in compliance no later than August 12, 2024.

Re: Permit Numbers: 107520, 127838, PSDTX1384, PSDTX1588, O4166, and O4286

To ensure future control assurance, during this shutdown the Unit will also tie the flare lines into the Enclosed Ground Flare (EGF) system at the site, which could then act as a permanent back-up flare system.

In the interim, the following relates to the compliant operation of this flare:

- The current thermal mass meter is calibrated to a composition consistent with normal operations, which are expected to occur a majority of the time;
- The current steam flow meter can measure normal conditions when venting to the flare requires a high steam flow rate. In the circumstance when shutting down, the high steam flow rate is no longer needed; there are minimal VOCs going to the flare and the Unit decreases the steam flow rate.
- Comply with the 270 BTU/scf Net Heating Value in the Combustion Zone (NHVcz) during normal operations (expected to occur more than 98% of the time).
- No full shutdowns are planned until the replacement flare tip project takes place and expects to operate with no visible emissions, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. If an unplanned operation occurs that may cause excess visible emissions at the flare, the Unit will do its best to prevent or minimize any smoking.

The Texas Commission on Environmental Quality (TCEQ) Executive Director has made a final decision to approve your AMOC request. The TCEQ has been delegated authority to enforce the above cited standards and is authorized to approve this AMOC following 40 CFR §63.6(i). You are reminded that approval of any AMOC shall not abrogate the Executive Director or Administrator's authority under the Act or in any way prohibit later canceling the AMOC. By copy of this letter, we are informing the Environmental Protection Agency, Region 6, of this decision as required by TCEQ's delegation of authority.

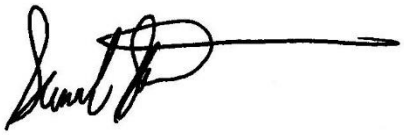
This AMOC approval may supersede certain requirements or representations in Permit Nos. 107520/PSDTX1384 and/or 127838/PSDTX1588. To ensure effective and consistent enforceability, we request that FPC incorporate this AMOC into the permit(s) through submittal of alteration(s) no later than 90 days after this approval.

This approval may also change applicable requirements for the site, which are identified in the site operating permit (SOP) O4166 and O4286. The TCEQ recommends the submittal of a SOP administrative revision if any changes are necessary. Changes meeting the criteria for an administrative revision can be operated before issuance of the revision if a complete application is submitted to the TCEQ and this information is maintained with the SOP records at the site.

If you need further information or have any questions, please contact Ms. Anne Inman, P.E. at (512) 239-1276 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Re: Permit Numbers: 107520, 127838, PSDTX1384, PSDTX1588, O4166, and O4286

Sincerely,



Samuel Short, Deputy Director
Air Permits Division
Office of Air
Texas Commission on Environmental Quality

cc: Air Section Manager, Region 14 - Corpus Christi
Jesse E. Chacon, P.E., Manager, Operating Permits Section, Air Permits Division, OA: MC-163
Becky Tsuchiya, Manager, Chemical New Source Review Permits Section, Air Permits Division, OA: MC-163
Air Permits Section Chief, New Source Review Section (6PD-R), U.S. Environmental Protection Agency, Region 6, Dallas

Project Number: 356348

Texas Commission on Environmental Quality

Title V Existing

4166

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	PE3 PLANT
County	CALHOUN
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?	Owner Operator
What is the applicant's Customer Number (CN)?	CN600130017
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Formosa Plastics Corporation, Texas
Texas SOS Filing Number	5107506
Federal Tax ID	222355464
State Franchise Tax ID	12223554648
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 applicable)	9 PEACH TREE HILL RD
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 contact.	MIKE RIVET(FORMOSA PLASTIC...)
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 applicable)	PO BOX 700
Routing (such as Mail Code, Dept., or Attn:)	
City	POINT COMFORT
State	TX
Zip	77978

Phone (###-###-####)	3619877000
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	mikerivet@ftpc.fpcusa.com

Technical Contact

Person TCEQ should contact for questions about this application:	
Select existing TC contact or enter a new contact.	New Contact
Organization Name	Formosa Plastics Corporation Texas
Prefix	MS
First	LeAnn
Middle	
Last	Usoff
Suffix	
Credentials	
Title	Assistant Manager of Air Permitting
Enter new address or copy one from list:	Duly Authorized Representative Contact Address
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 700
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:	SOP
2) Permit Latitude Coordinate:	28 Deg 41 Min 20 Sec
3) Permit Longitude Coordinate:	96 Deg 32 Min 50 Sec
4) Is this submittal a new application or an update to an existing application?	New Application
4.1. What type of permitting action are you applying for?	Significant Revision
4.1.1. Are there any permits that should be voided upon issuance of this permit application through permit conversion?	No
4.1.2. Are there any permits that should be voided upon issuance of this permit application through permit consolidation?	No
5) Who will electronically sign this Title V application?	Duly Authorized Representative

6) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

[File Properties]

File Name	OP_1_PE3+Title+V+(O4166)+Significant+Revision+Application-05.03.2024.signed.pdf
Hash	7525B13ABCD28C3AA4552E686148A0D79FB79F09A6468E8769DBE7879132698D
MIME-Type	application/pdf

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

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 4166.
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:	24.116.223.222
Signature Date:	2024-05-02
Signature Hash:	1D96686854B12E0F5FA241401E07955B06BD2257800F82BF7A872089D866131A
Form Hash Code at time of Signature:	3BE9EE6035FD258E17021AD150A06C6066C35B8FA1F46B6E370EB3295EA5EE3F

Submission

Reference Number:	The application reference number is 649895
Submitted by:	The application was submitted by ER093335/Mike Rivet
Submitted Timestamp:	The application was submitted on 2024-05-02 at 15:11:08 CDT
Submitted From:	The application was submitted from IP address 24.116.223.222
Confirmation Number:	The confirmation number is 538243
Steers Version:	The STEERS version is 6.74
Permit Number:	The permit number is 4166

Additional Information

Application Creator: This account was created by Sally Carroll