From:	BTPEnvironmental <btpenvironmental@basf.com></btpenvironmental@basf.com>
Sent:	Tuesday, May 6, 2025 2:48 PM
То:	Kyle Murray; Tammy Villarreal
Cc:	Lois McQuade; Theresa Hulvey; Jacob Benfield
Subject:	RE: [EXT] Working Draft Permit FOP O2551/Project 36831, BASF
	TOTALEnergies Petrochemicals, LLC

Kyle,

We finished our review. We offer no additional comments. I believe would should be ready to proceed to towards public notice.

Thank you,

Jacob Benfield, P.E.

Sr. Environmental & Sustainability Specialist

Mobile: +1.915.433.8774, Email: <u>jacob.benfield@basf.com</u> or <u>btpenvironmental@basf.com</u> Postal Address: BASF TotalEngeries Petrochemicals LLC, P.O. Box 2506, Port Arthur, TX 77643, USA



We create chemistry

BASF Corporation

- We take ownership of our safety culture.
- We share and implement best practices.
- We are empowered to stop

From: Kyle Murray <<u>Kyle.Murray@tceq.texas.gov</u>>
Sent: Friday, May 2, 2025 1:57 PM
To: Tammy Villarreal <<u>TVillarreal@clara-vista.com</u>>
Cc: BTPEnvironmental <<u>BTPEnvironmental@basf.com</u>>; Lois McQuade <<u>LMcQuade@clara-vista.com</u>>;
Theresa Hulvey <<u>thulvey@clara-vista.com</u>>; Jacob Benfield <<u>jacob.benfield@basf.com</u>>
Subject: RE: [EXT] Working Draft Permit -- FOP O2551/Project 36831, BASF TOTALEnergies
Petrochemicals, LLC

Good afternoon all,

I have attached the revised WDP that now incorporates requirements for control device X-8501 and your additional comments from our previous correspondence. Please take the time to review the document and provide me with any further comments you may have by **Friday, May 9th.** If you have no comments, please indicate your approval and we will proceed towards public notice. Thank you and have a great weekend!

Sincerely,

Kyle J. Murray

Permit Reviewer OA/Air Permits Division/OP Section Texas Commission on Environmental Quality MC 163, P.O. Box 13087 Austin, TX 78711-3087 kyle.murray@tceq.texas.gov

Phone: (512) 239-1279 Fax: (512) 239-1400



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

From:	Tammy Villarreal <tvillarreal@clara-vista.com></tvillarreal@clara-vista.com>
Sent:	Friday, April 25, 2025 10:11 AM
То:	Kyle Murray
Cc:	BTPEnvironmental; Lois McQuade; Theresa Hulvey; Tammy Villarreal;
	jacob.benfield@basf.com
Subject:	RE: [EXT] Working Draft Permit FOP O2551/Project 36831, BASF
	TOTALEnergies Petrochemicals, LLC
Attachments:	OP Cro Signed 2025 4 24pdf.pdf; UA12 Tables 4a and 4b.pdf

Good morning Mr. Murray,

On behalf of BASF TotalEnergies Petrochemicals, LLC (BTP), we are submitting a signed OP-CRO1 form as well as pages 32 and 33 of the OP-UA12 form (Tables 4a and 4b) so NSPS VV requirements for control device X-8501 can be associated with Unit IDs F-1 and F-4.

In addition, we have the following comments on the draft permit received on April 10, 2025.

- 1. Please change 'Nafta' to 'NAFTA' on the first page of the permit, after "AUTHORIZING THE OPERATION OF"
- 2. We noticed that the BTP's Working Draft Permit request #1a noted in the November 5, 2024 response to you and ultimately included in the November 6, 2024 WDP, was omitted from this version of the WDP. Please add the following to the New Source Review Authorization Reference Table:
 - Add a "*" to GHGPSDTX3 and a footnote that reads "*For reference, EPA Issued Permit PSD-TX-903-GHG has been assigned TCEQ permit number GHGPSDTX3." (BTP's existing TV Permit has this reference.)

Thanks,

Tammy **Tammy Villarreal, P.E.** Clara Vista Environmental, LLC (281) 728-4093

Fugitive Emission Unit Attributes Form OP-UA12 (Page 32) Federal Operating Permit Program Table 4a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60) Subpart VV: Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006

Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.		
4/24/25	0-2551	RN100216977		

Unit ID No.	SOP Index No.	Produces Chemicals	Affected Facility	Construction/ Modification Date	Compliance Option	Design Capacity	Produces Heavy Liquid Chemicals	Beverage Alcohol Production
F-1	60VV-ALL	YES	YES	81-06	60VV	1000+	NO	NO
F-4	60VV-ALL	YES	YES	81-06	60VV	1000+	NO	NO

Texas Commission on Environmental Quality Fugitive Emission Unit Attributes Form OP-UA12 (Page 33) Federal Operating Permit Program Table 4b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

Subpart VV: Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006

Date	Permit No.	Regulated Entity No.		
4/24/25	0-2551	RN100216977		

		Title 40 CFR	Part 60, Subpart	VV Fugitive Unit	Components			
		Any Component				Pumps		
Unit ID No.	SOP Index No.	Equipment in VOC Service	Vacuum Service	VOC Service	Light Liquid Service	EEL	EEL ID No.	Complying with § 60.482-2
F-1	60VV-ALL	YES	NO	NO	YES	NO		YES
F-4	60VV-ALL	YES	NO	NO	YES	NO		YES

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: 100216977					
CN: 604166967					
Account No.: JE-0843-F					
Permit No.: O-2551					
Project No.: 36831					
Area Name: Ethylene/Propylene Cracker and Coger	neration				
Company Name: BASF TOTALEnergies Petrochem	icals LLC				
II. Certification Type (Please mark appropria	te box)				
Responsible Official Representative	Duly Authorized Representative				
III. Submittal Type (Please mark appropriate b	box) (Only one response can be accepted per form)				
SOP/TOP Initial Permit Application					
GOP Initial Permit Application	Update to Permit Application				
Other:					

Page ____ of __

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

All initial issuance, revision, and renewal permit application submittals requiring certification must be accompanied by this form. Updates to acid rain or CSAPR (other than public notice verification materials) must be certified prior to authorization of public notice for the draft permit.

IV. Certification of Truth		7. Certification of Truth								
This certification does not extend to	information which is design:	ated by TCEQ as in	formation for reference only.							
I, John Lycan	certify that I am the	e <u>RO</u>								
(Certifier Name printe	(Certifier Name printed or typed) (RO or DAR)									
the time period or on the specific date(Note: Enter Either a Time Period or Sp	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 <u>01/18/2024</u>	to 04/23/2025									
	(Start Date)		(End Date)							
Specific Dates:										
(Date 1)	(Date 2)	(Date 3)	(Date 4)							
		~								
(Date 5)		(Date 6)								
Signature:										
Title: Vice President Port Arthur Site										

Page ____ of ____

Fugitive Emission Unit Attributes Form OP-UA12 (Page 32) Federal Operating Permit Program Table 4a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60) Subpart VV: Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006 Texas Commission on Environmental Quality

Permit No.	Regulated Entity No.
0-2551	RN100216977

Unit ID No.	SOP Index No.	Produces Chemicals	Affected Facility	Construction/ Modification Date	Compliance Option	Design Capacity	Produces Heavy Liquid Chemicals	Beverage Alcohol Production
F-1	60VV-ALL	YES	YES	81-06	60VV	1000+	NO	NO
F-4	60VV-ALL	YES	YES	81-06	60VV	1000+	NO	NO
		14						
					K			

TCEQ-10045 (APD-ID 27v6, Revised 02/25) OP-UA12 This form is for use by facilities subject to air quality permit requirements and may be revised periodically. (Title V Release 07/23)

Page ____ of ____

Texas Commission on Environmental Quality Fugitive Emission Unit Attributes Form OP-UA12 (Page 33) Federal Operating Permit Program Table 4b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60) Subpart VV: Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006

Date	Permit No.	Regulated Entity No.
4/23/25	0-2551	RN100216977

		Title 40 CFR	Part 60, Subpart	VV Fugitive Unit	Components			
		Any Component			Pumps			
Unit ID No.	SOP Index No.	Equipment in VOC Service	Vacuum Service	VOC Service	Light Liquid Service	EEL	EEL ID No.	Complying with § 60.482-2
F-1	60VV-ALL	YES	NO	NO	YES	NO		YES
F-4	60VV-ALL	YES	NO	NO	YES	NO		YES
	1							
19181								
					6			

TCEQ-10045 (APD-ID 27v6, Revised 02/25) OP-UA12 This form is for use by facilities subject to air quality permit requirements and may be revised periodically. (Title V Release 07/23)

Page _____ of _____

From: Kyle Murray Sent: Wednesday, April 16, 2025 10:47 AM To: Lois McQuade Cc: Theresa Hulvey Subject: RE: [EXT] Working Draft Permit -- FOP O2551/Project 36831, BASF TOTALEnergies Petrochemicals, LLC

Good morning,

Just a follow-up email recapping our meeting this morning: Pages 41-42 (Table 4j) were filled out correctly. However, we need some of the general applicability questions to be filled out as well in order to pick up the closed vent and control device requirements currently missing from your permit. Normally the "ALL" index number does not need for these questions to be filled out, but if adding the control device and closed vent requirements, it is needed due to the way our logic system works.

Please fill out the questions on Page 32 of the OP-UA12 (Table 4a) and the Equipment in VOC Service question on Page 33 (Table 4b) for both Unit IDs (F-1 and F-4). The current index number "60VV-ALL" will still be used.

Please complete this by **Friday, April 25th,** and feel free to reach out if you have any further questions. Thank you!

Sincerely,

Kyle J. Murray

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC 163, P.O. Box 13087

Austin, TX 78711-3087

kyle.murray@tceq.texas.gov

Phone: (512) 239-1279

Fax: (512) 239-1400



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

From: Lois McQuade <LMcQuade@clara-vista.com>
Sent: Tuesday, April 15, 2025 3:01 PM
To: Kyle Murray <Kyle.Murray@tceq.texas.gov>
Cc: Theresa Hulvey <thulvey@clara-vista.com>
Subject: RE: [EXT] Working Draft Permit -- FOP O2551/Project 36831, BASF TOTALEnergies
Petrochemicals, LLC

Kyle

10 am tomorrow works good for us. I'll send out a teams meeting notice.

Lois

From: Kyle Murray <<u>Kyle.Murray@tceq.texas.gov</u>> Sent: Tuesday, April 15, 2025 2:30 PM To: Lois McQuade <<u>LMcQuade@clara-vista.com</u>>; Tammy Villarreal <<u>TVillarreal@clara-vista.com</u>> Cc: BTPEnvironmental <<u>BTPEnvironmental@basf.com</u>>; jacob.benfield@basf.com; Theresa Hulvey <<u>thulvey@clara-vista.com</u>> Subject: RE: [EXT] Working Draft Permit -- FOP O2551/Project 36831, BASF TOTALEnergies Petrochemicals, LLC

Good afternoon Lois,

Apologies for missing your call, it has been a busy morning. I will look into why these requirements are missing (or potentially missing) and we can have a call discussing this tomorrow. I have availability from 10:00 am to 12:00 or from 1:30 to 2:30 pm. Let me know what works for you. Thank you!

Sincerely,

Kyle J. Murray

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC 163, P.O. Box 13087

Austin, TX 78711-3087

Phone: (512) 239-1279

Fax: (512) 239-1400

How are we doing? Fill out our online customer satisfaction survey at <u>www.tceq.texas.gov/customersurvey</u>

From: Lois McQuade <LMcQuade@clara-vista.com> Sent: Tuesday, April 15, 2025 12:07 PM To: Kyle Murray <Kyle.Murray@tceq.texas.gov>; Tammy Villarreal <<u>TVillarreal@clara-vista.com</u>> Cc: BTPEnvironmental <BTPEnvironmental@basf.com>; jacob.benfield@basf.com; Theresa Hulvey <<u>thulvey@clara-vista.com</u>>

Subject: RE: [EXT] Working Draft Permit -- FOP O2551/Project 36831, BASF TOTALEnergies Petrochemicals, LLC

Kyle,

In regards to the phone message I left earlier today, the following is the previously submitted draft permit comment that we still have for the draft permit (FOP O2551/Project 36831):

• BTP submitted an updated OP-UA12 form for F-1 and F-4 on March 19, 2025. Pages 41 and 42 of the OP-UA12 form lists control device X-8501 for both Unit ID F-1 and F-4. How is this represented in the Title V permit? – Applicable Requirements should now be updated according to the new UA Form data for these units.

The referenced UA12 pages required that we identify our flare control, Flare ID X-8501. However for Chapter NSPS VV, we do not see any corresponding flare control requirements and we are wondering if there are any citations such as 60.482-10 missing from the Title V permit.

It may be easier to discuss our question/comment on a phone call. Please let us know whey you may be available for a quick call. Tomorrow, Wednesday, is fairly open for us.

Thank You,

Lois McQuade

Clara Vista Environmental, LLC

(832) 829-5662

From: Kyle Murray <<u>Kyle.Murray@tceq.texas.gov</u>>
Sent: Thursday, April 10, 2025 3:12 PM
To: Tammy Villarreal <<u>TVillarreal@clara-vista.com</u>>
Cc: BTPEnvironmental <<u>BTPEnvironmental@basf.com</u>>; jacob.benfield@basf.com; Theresa Hulvey
<<u>thulvey@clara-vista.com</u>>; Lois McQuade <<u>LMcQuade@clara-vista.com</u>>

Subject: RE: [EXT] Working Draft Permit -- FOP O2551/Project 36831, BASF TOTALEnergies Petrochemicals, LLC

Good afternoon all,

Thank you for the updates and your comments. Please see attached revised WDP and my notes in green regarding updates below. Please review the revised WDP and provide me with any further comments you may have by **Thursday, April 17**th. If you have no comments, please indicate your approval and we will proceed towards public notice. Thank you!

Sincerely,

Kyle J. Murray

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC 163, P.O. Box 13087

Austin, TX 78711-3087

kyle.murray@tceq.texas.gov

Phone: (512) 239-1279

Fax: (512) 239-1400

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

From: Tammy Villarreal <<u>TVillarreal@clara-vista.com</u>> Sent: Monday, April 7, 2025 8:21 AM To: Kyle Murray <<u>Kyle.Murray@tceq.texas.gov</u>> Cc: BTPEnvironmental <<u>BTPEnvironmental@basf.com</u>>; jacob.benfield@basf.com; Theresa H<u>ulvey <thulvey@clara-vista.com</u>>; Tammy Vill<u>arreal <TVillarreal@clara-vi</u>sta.com>; Lois McQuade <<u>LMcQuade@clara-vista.com</u>> Subject: FW(: [EXT] Working Draft Permit ______ FOR_025E1 (Project 26821_______ RASE TOTAL Energies

Subject: FW: [EXT] Working Draft Permit -- FOP O2551/Project 36831, BASF TOTALEnergies Petrochemicals, LLC

Good morning Mr. Murray,

On behalf of BASF TotalEnergies Petrochemicals, LLC (BTP), we have the following comments/questions on the draft permit received on March 31, 2025.

- Corrected Forms OP-2 and OP-SUMR are attached. Incorporated new PBR authorizations
- BTP submitted an updated OP-UA12 form for F-1 and F-4 on March 19, 2025. Pages 41 and 42 of the OP-UA12 form lists control device X-8501 for both Unit ID F-1 and F-4. How is this represented in the Title V permit? Applicable Requirements should now be updated according to the new UA Form data for these units.
- Special Terms and Conditions (STC) number 22 and 23, on Page 10, of the draft permit appears to be duplicates. STC number 22 is detailed and is missing the requirements, while STC number 23 appears to be a boilerplate language with no specific details. Updated
- It doesn't appear that updates to the Major NSR Table submitted on March 19, 2025, were included in the draft permit. We are resubmitting the mark-ups in the attached word document. Updates are presented via red line strikeout. Apologies, but I did not include the updated table in the last revised WDP I sent you. It is now updated.

Please let us know if you have any questions.

Best Regards,

Tammy Villarreal, P.E.

Clara Vista Environmental, LLC

(281) 728-4093

From:	Tammy Villarreal <tvillarreal@clara-vista.com></tvillarreal@clara-vista.com>
Sent:	Monday, April 7, 2025 8:21 AM
То:	Kyle Murray
Cc:	BTPEnvironmental; jacob.benfield@basf.com; Theresa Hulvey; Tammy Villarreal; Lois McQuade
Subject:	FW: [EXT] Working Draft Permit FOP O2551/Project 36831, BASF TOTALEnergies Petrochemicals, LLC
Attachments:	OP-2 OP-SUMR_04012025.pdf; Major NSR Summary Table.docx
Follow Up Flag: Flag Status:	Follow up Completed

Good morning Mr. Murray,

On behalf of BASF TotalEnergies Petrochemicals, LLC (BTP), we have the following comments/questions on the draft permit received on March 31, 2025.

- Corrected Forms OP-2 and OP-SUMR are attached.
- BTP submitted an updated OP-UA12 form for F-1 and F-4 on March 19, 2025. Pages 41 and 42 of the OP-UA12 form lists control device X-8501 for both Unit ID F-1 and F-4. How is this represented in the Title V permit?
- Special Terms and Conditions (STC) number 22 and 23, on Page 10, of the draft permit appears to be duplicates. STC number 22 is detailed and is missing the requirements, while STC number 23 appears to be a boilerplate language with no specific details.
- It doesn't appear that updates to the Major NSR Table submitted on March 19, 2025, were included in the draft permit. We are resubmitting the mark-ups in the attached word document. Updates are presented via red line strikeout.

Please let us know if you have any questions.

Best Regards, **Tammy Villarreal, P.E.** Clara Vista Environmental, LLC (281) 728-4093

Date:	4/1/2025
Permit No:	O-2551
Regulated Entity No.:	100216977
Company Name :	BASF TOTALEnergies Petrochemicals LLC

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

Revision	Revision		Unit/Group Proce	ess		
No.	Code	New Unit	ID No.	Applicable Form	NSR Authorization	Description of Chang
1	MS-C	No	N/A	OP-REQ1	N/A	Provide updated Form OP-REQ1.
2	MS-C	No	See OP-PBRSUP	See OP-PBRSUP	See OP-PBRSUP	Submittal of OP-PBRSUP
3	MS-C	No	N/A		36644	Incorporate the Permit 36644 alt permit.
4	ADMIN-G	No	N/A		36644	Incorporate the Alternative Meth 28, 2023, into the Title V operation
5	MS-C	No	N-15	OP-2 UA-15	36644, PSDTX903M5, N007M1	Add new scenario for existing pro 115 applicability for sending a pro approved AMOC.
6	MS-C	No	N-15A	OP-2 UA-15	36644, PSDTX903M5, N007M1	Add new scenario for existing pro 115 applicability for sending a pro approved AMOC.
7	MS-C	No	HONWWTP	OP-2	36644, PSDTX903M5, N007M1	Omit Group 1 MACT G wastewate only MACT G requirements. (Sou
8	MS-C	No	T-8201	OP-2	36644, PSDTX903M5, N007M1	Omit Group 1 MACT G wastewate only MACT G requirements. (Sou
9	SIG-B	OP-2	OP-2	36644, PSDTX903M5, N007M1	Omit NSPS NNN requirements. T 40 CFR Part 63, Subpart YY.	
9	210-8	No	T-5702	OP-REQ2	30044, PSD1X903WIS, N007WI1	Add negative applicability to 40 C
10	SIG-B	No	R-2501X	OP-2	36644, PSDTX903M5, N007M1	Omit NSPS RRR requirements. Th NSPS RRR and is not considered a HONWWTP which is a wastewate
10	510 5		11 2001/1	OP-REQ2		Subpart YY and 40 CFR Part 63, Su
11	ADMIN-A	No	TK-9601R	OP-2	36644, PSDTX903M5, N007M1	Add negative applicability for 40 Update Unit ID to coincide with fa 9601R.
12	ADMIN-A	No	D-3730X	OP-2	36644, PSDTX903M5, N007M1	Update Unit ID to coincide with fa
13	MS-C	No	B-7240	OP-2 OP-UA6	36644, PSDTX903M5, N007M1	Add 40 CFR 63 Subpart DDDDD de DDDDD.
14	MS-C	No	B-7280	OP-2 OP-UA6	36644, GHGPSDTX3, PSDTX903M5, N007M1	Add 40 CFR 63 Subpart DDDDD do DDDDD.
15	MS-C	No	B-7290	OP-2 OP-UA6	36644, GHGPSDTX3, PSDTX903M5, N007M1	Add 40 CFR 63 Subpart DDDDD d DDDDD.

ges and Provisional Terms and Conditions

Iteration dated June 14, 2023, into the Title V operation

thod of Control (AMOC) Plan, AMOC No. 220 dated April tion permit.

process vents N-15 and N-15A and add 30 TAC Chapter process vent stream to a flare that requires a recently

process vents N-15 and N-15A and add 30 TAC Chapter process vent stream to a flare that requires a recently

ater requirements. The source is subject to site-wide ource is Group 2.)

ater requirements. The source is subject to site-wide ource is Group 2.)

The source is subject to 40 CFR Part 63, Subpart G and

CFR Part 60, Subpart NNN.

The reactor does not produce any products listed in d a process vent. The source is a part of Unit ID ater treatment system that is subject to 40 CFR Part 63, Subpart G.

0 CFR Part 60, Subpart RRR. facility records. Replace Unit ID TK-9601 with TK-

facility records. Replace Unit ID D-3780X with D-3730X.

detailed rules to B-7240 for compliance with 63 Subpart

detailed rules to B-7280 for compliance with 63 Subpart

detailed rules to B-7290 for compliance with 63 Subpart

Date:	4/1/2025
Permit No:	O-2551
Regulated Entity No.:	100216977
Company Name :	BASF TOTALEnergies Petrochemicals LLC

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

Revision	Revision		Unit/Group Pro	cess		
No.	Code	New Unit	ID No.	Applicable Form	NSR Authorization	Description of Chang
16	MS-C	No	N-12	OP-2 OP-UA6 OP-UA5	36644, PSDTX903M5, N007M1	Add 40 CFR 63 Subpart DDDDD d DDDDD.
17	MS-C	No	N-13	OP-2 OP-UA6 OP-UA5	36644, PSDTX903M5, N007M1	Add 40 CFR 63 Subpart DDDDD de DDDDD.
18	SIG-B	No	TK-2501B	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Add negative 40 CFR Part 60, Sub
19	SIG-B	No	TK-2501	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Add negative 40 CFR Part 60, Sub
20	MS-C	No	X-8502	OP-2	36644, PSDTX903M5, N007M1	Remove scenarios associated wit
21	MS-C	Yes	T270596	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORG applicability as GRPINORGSV.
22	MS-C	Yes	TK-7401	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORG applicability as GRPINORGSV.
23	MS-C	Yes	TK-7601	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORG applicability as GRPINORGSV.
24	MS-C	Yes	TK-2493	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORG applicability as GRPINORGSV.
25	MS-C	Yes	TK-2491	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORG applicability as GRPINORGSV.
26	MS-C	Yes	TK-9604	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORG applicability as GRPINORGSV.
27	MS-C	Yes	TK-9801	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORG applicability as GRPINORGSV.
28	MS-C	Yes	TK-5273	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPSV1K. as GRPSV1K.
29	MS-C	Yes	ТК-5273Х	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPSV1K. as GRPSV1K.
30	MS-C	Yes	TK-5510	OP-2 OP-SUMR	36644, PSDTX903M5, N007M1	Add storage vessel to GRPSV1K. as GRPSV1K.
31	MS-C	Yes	T233674	OP-2 OP-SUMR	106.371/09/04/2000	Add storage vessel to GRPSV1K. as GRPSV1K.
32	MS-C	Yes	T233676	OP-2 OP-SUMR	106.371/09/04/2000	Add storage vessel to GRPSV1K. as GRPSV1K.
33	MS-C	Yes	T113596	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPSV1K. as GRPSV1K.
34	MS-C	Yes	T131632	OP-2 OP-SUMR	106.371/09/04/2000	Add storage vessel to GRPSV1K. as GRPSV1K.

iges and Provisional Terms and Conditions detailed rules to N-12 for compliance with 63 Subpart detailed rules to N-13 for compliance with 63 Subpart ubpart Kb applicability. ubpart Kb applicability. vith SOP Index No. 60A-1 and 60A-2 GSV. Unit ID T270596 has the same regulatory RGSV. Unit ID TK-7401 has the same regulatory GSV. Unit ID TK-7601 has the same regulatory GSV. Unit ID TK-2493 has the same regulatory GSV. Unit ID TK-2491 has the same regulatory GSV. Unit ID TK-9604 has the same regulatory GSV. Unit ID TK-9801 has the same regulatory . Unit ID TK-5273 has the same regulatory applicability . Unit ID TK-5273X has the same regulatory applicability . Unit ID TK-5510 has the same regulatory applicability . Unit ID T233674 has the same regulatory applicability . Unit ID T233676 has the same regulatory applicability . Unit ID T131632 has the same regulatory applicability . Unit ID T131632 has the same regulatory applicability

Date:	4/1/2025
Permit No:	O-2551
Regulated Entity No.:	100216977
Company Name :	BASF TOTALEnergies Petrochemicals LLC

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

Revision	Revision		Unit/Group Proc	ess		
No.	Code	New Unit	ID No.	Applicable Form	NSR Authorization	Description of Change
35	MS-C	Yes	T280047	OP-2 OP-SUMR	106.371/09/04/2000	Add storage vessel to GRPSV1K. as GRPSV1K.
36	SIG-B	Yes	ТК-1501	OP-2 OP-SUMR OP-UA3 OP-REQ2	106.472/09/04/2000	Add TK-1501 to Title V permit as 23146). Add negative 40 CFR Par
37	SIG-B	Yes	ТК-2210	OP-2 OP-SUMR OP-UA3 OP-REQ2	36644, PSDTX903M5, N007M1	Add storage vessel. Provide unit 40 CFR Part 60, Subpart Kb applic
38	SIG-B	Yes	ТК-2620	OP-2 OP-SUMR OP-UA3 OP-REQ2	106.472/09/04/2000	Add storage vessel. Provide unit 40 CFR Part 60, Subpart Kb applic
39	SIG-B	Yes	ТК-4020	OP-2 OP-SUMR OP-UA3 OP-REQ2	106.472/09/04/2000	Add storage vessel. Provide unit 40 CFR Part 60, Subpart Kb applic
40	SIG-B	Yes	T241176	OP-2 OP-SUMR OP-UA3 OP-REQ2	106.472/09/04/2000	Add storage vessel. Provide unit 40 CFR Part 60, Subpart Kb applic
41	ADMIN-A	No	GRPSV1K	OP-2 OP-REQ2		Update negative NSPS Kb langua MACT YY and Chapter 115 remain
42	ADMIN-A	No	D-8001R	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Update negative NSPS Kb languag
43	ADMIN-A	No	DSL-TK	OP-2 OP-REQ2	106.473/09/04/2000	Update negative NSPS Kb langua
44	ADMIN-A	No	ТК-2210Х	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Update negative NSPS Kb langua
45	ADMIN-A	No	тк-3110Х	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Update negative NSPS Kb languag
46	ADMIN-A 722v26, revised 03/22)	No	тк-3710Х	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Update negative NSPS Kb languag

This form is for use by facilities subject to air quality permit requirements and may be revised periodically. (Title V revised 03/10)

ges and Provisional Terms and Conditions
. Unit ID T280047 has the same regulatory applicability
s submitted via Op-Notify on 07/08/2015 (Project No.

art 60, Subpart Kb applicability.

it attribute information on Form OP-UA3. Add negative licability.

it attribute information on Form OP-UA3. Add negative licability.

it attribute information on Form OP-UA3. Add negative licability.

it attribute information on Form OP-UA3. Add negative licability.

lage to current language. Negative applicability for ain the same.

lage to current language.

Date:	4/1/2025
Permit No:	O-2551
Regulated Entity No.:	100216977
Company Name :	BASF TOTALEnergies Petrochemicals LLC

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

Revision	Revision		Unit/Group Pro	cess		
No.	Code	New Unit	ID No.	Applicable Form	NSR Authorization	Description of Change
47	ADMIN-A	No	ТК-7403Х	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Update negative NSPS Kb language
48	ADMIN-A	No	ТК-9603Х	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Update negative NSPS Kb language
49	SIG-B	No	X-8501	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Update negative NSPS A language.
50	MS-A	No	F-1	OP-2 OP-SUMR	36644, PSDTX903M5, N007M1 160345 (106.261) 160348 (106.261/106.262) 167920 (106.261/106.262) 169666 (106.261) 172347 (106.261) 106.261/11/01/2003[160345] 106.261/11/01/2003[160348] 106.262/11/01/2003[167920] 106.262/11/01/2003[167920] 106.261/11/01/2003[169666] 106.261/11/01/2003[172347]	Add PBR Registration numbers for
51	MS-A	No	F-4	OP-2 OP-SUMR	36644, PSDTX903M5, N007M1 160348 (106.261/106.262) 106.261/11/01/2003[160348] 106.262/11/01/2003[160348]	Add PBR Registration numbers for
52	MS-A	No	N-15	OP-2 OP-SUMR	36644, PSDTX903M5, N007M1 160348 (106.261/106.262) 170435 (106.261) 106.261/11/01/2003[160348] 106.262/11/01/2003[160348] 106.261/11/01/2003[170435]	Add PBR Registration numbers for
53	MS-A	No	N-15A	OP-2 OP-SUMR	36644, PSDTX903M5, N007M1 160348 (106.261/106.262) 170435 (106.261) 106.261/11/01/2003[160348] 106.262/11/01/2003[160348] 106.261/11/01/2003[170435]	Add PBR Registration numbers for

ges and Provisional Terms and Conditions
age to current language.
age to current language.
ge.
ōor Unit ID
or Unit ID
ör Unit ID
or Unit ID

Date:	4/1/2025
Permit No:	O-2551
Regulated Entity No.:	100216977
Company Name :	BASF TOTALEnergies Petrochemicals LLC

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

Revision	Revision		Unit/Group Process			
No.	Code	New Unit	nit ID No. Applicable Form		NSR Authorization	Description of Chang
				OP-2		
54	MS-C	No	F-1	OP-SUMR	36644, PSDTX903M5, N007M1	Remove 30 TAC Chapter 115, Fu
				OP-REQ2		
				OP-2		
55	MS-C	No	F-4	OP-SUMR	36644, PSDTX903M5, N007M1	Remove 30 TAC Chapter 115, Fu
				OP-REQ2		

nges and Provisional Terms and Conditions

ugitives Pet Ref B Counties Permit Shield.

ugitives Pet Ref B Counties Permit Shield.

Date:	Permit No.	Regulated Entity No.		
4/1/2025	O-2551	100216977		

Unit /	Unit / Process		Unit/P	rocess		Preconstruction Authorizations	
Process AI	ss Revision No. ID No. Applicable Form		Name/ Description	САМ	30 TAC Chapter 116/ 30 TAC Chapter 106	Title I	
А	21	T270596	OP-2 OP-SUMR	Optisperse HP7414 Tank		106.472/09/04/2000	
А	22	TK-7401	OP-2 OP-SUMR	Potable Water Tank		106.472/09/04/2000	
А	23	TK-7601	OP-2 OP-SUMR	Potable Water Head Tank	Tank 106.472/09/04/2000		
А	24	TK-2493	OP-2 OP-SUMR	20Y15 Antifoulant Tank		106.472/09/04/2000	
А	25	TK-2491	OP-2 OP-SUMR	20Y15 Antifoulant Tank		106.472/09/04/2000	
А	26	TK-9604	OP-2 OP-SUMR	Phosphate Injection Tank	Phosphate Injection Tank		
А	27	TK-9801	OP-2 OP-SUMR	C4 Clarified Water Tank		106.472/09/04/2000	
А	28	TK-5273	OP-2 OP-SUMR	Antifoam Agent Porta-Feed		106.472/09/04/2000	
А	29	TK-5273X	OP-2 OP-SUMR	Antifoam Agent Porta-Feed		106.472/09/04/2000	
A	30	TK-5510	OP-2 OP-SUMR	Lube Oil Reservoir		36644	PSDTX903M5, N007M1
А	31	T233674	OP-2 OP-SUMR	20Y114 Antifoulant Tank		106.371/09/04/2000	

TCEQ-10344 (APDG 5767v7, Revised 05/20) OP-SUMR This form is for use by facilities subject to air quality permit requirements and may be revised periodically.

Date:	Permit No.	Regulated Entity No.		
4/1/2025	O-2551	100216977		

Unit /	Unit / Process		Unit/P	rocess		Preconstruction Authoriz	zations
Process AI	Revision No.	ID No.	Applicable Form	Name/ Description	САМ	30 TAC Chapter 116/ 30 TAC Chapter 106	Title I
А	32	T233676	OP-2 OP-SUMR	20Y14 Tank		106.371/09/04/2000	
А	33	T113596	OP-2 OP-SUMR	Petroflo 4H3 Tank	106.472/09/04/2000		
А	34	T131632	OP-2 OP-SUMR	Spectrus NX1100 Tank		106.371/09/04/2000	
А	35	T280047	OP-2 OP-SUMR	CT Biodispersant Tank		106.371/09/04/2000	
A	36	TK-1501	OP-2 OP-SUMR OP-UA3 OP-REQ2	Chemical Injection Tank		106.472/09/04/2000	
А	37	TK-2210	OP-2 OP-SUMR OP-UA3 OP-REQ2	Lube Oil Reservoir		36644	PSDTX903M5, N007M1

Date:	Permit No.	Regulated Entity No.		
4/1/2025	O-2551	100216977		

Unit /	Unit / Process		Unit/P	Preconstruction Authoriza	tions		
Process AI	Revision No.	ID No.	Applicable Form	Name/ Description	CAM	30 TAC Chapter 116/ 30 TAC Chapter 106	Title I
А	38	TK-2620	OP-2 OP-SUMR OP-UA3 OP-REQ2	20Y104 Poly Inhibitor Tank		106.472/09/04/2000	
А	39	TK-4020	OP-2 OP-SUMR OP-UA3 OP-REQ2	20Y104 Poly Inhibitor Tank		106.472/09/04/2000	
A	40	T241176	OP-2 OP-SUMR OP-UA3 OP-REQ2	20Y120 Poly Inhibitor Tank, 20%		106.472/09/04/2000	
A	50	F-1	OP-2 OP-SUMR	Fugitives		36644, PSDTX903M5, N007M1 160345 (106.261) 160348 (106.261/106.262) 167920 (106.261/106.262) 169666 (106.261) 172347 (106.261) 106.261/11/01/2003[160345] 106.261/11/01/2003[160348] 106.262/11/01/2003[167920] 106.262/11/01/2003[167920] 106.261/11/01/2003[169666] 106.261/11/01/2003[172347]	
А	51	F-4	OP-2 OP-SUMR	Benzene Extraction Equipment Leaks		36644, PSDTX903M5, N007M1 160348 (106.261/106.262) 106.261/11/01/2003[160348] 106.262/11/01/2003[160348]	
А	52	N-15	OP-2 OP-SUMR	Ground Flare		36644, PSDTX903M5, N007M1 160348 (106.261/106.262) 170435 (106.261) 106.261/11/01/2003[160348] 106.262/11/01/2003[160348] 106.261/11/01/2003[170435]	

Date:	Permit No.	Regulated Entity No.		
4/1/2025	O-2551	100216977		

Unit /	Unit / Process		Unit/P	Preconstruction Authorizations			
Process AI	Revision No.	ID No.	Applicable Form	Name/ Description CA		30 TAC Chapter 116/ 30 TAC Chapter 106	Title I
А	53	N-15A	OP-2 OP-SUMR	Enclosed Flare Vent Header		36644, PSDTX903M5, N007M1 160348 (106.261/106.262) 170435 (106.261) 106.261/11/01/2003[160348] 106.262/11/01/2003[160348] 106.261/11/01/2003[170435]	

Appendix B

Permit Numbers	:: 36644, PSDTX903M5 and	N007M1	Issuance Date: 08/10/2023				
Emission Point		Air	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
No. (1)	Source Name (2)	Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		NO _x (7) (10)	48.32	-			
		NO _x (7)	24.16	79.37			
		SO ₂ (7)	2.21	4.83		20, 21 , 29, 30, <u>34, 3</u> 5, 36, 38, 43	29, 30, <u>34, </u> 38
		CO (7) (11)	46.50	-			
N-1	Recycle Ethane Cracking Furnace H-0100	CO (7)	23.25	101.85	20 <u>, 22,</u> 28, 29, 30, 34		
		PM (7)	1.51	6.61			
		PM ₁₀ (7)	1.51	6.61			
		PM _{2.5} (7)	1.51	6.61			
		VOC (7)	0.57	2.51			
		NO _x (7) (10)	70.68	-		20, -21 , 29, 30, <u>34,</u> 35, 36, 38, 43	
		NO _x (7)	35.34	116.08			
		SO ₂ (7)	3.22	7.07			
N-2	Fresh Feed Cracking Furnace H-0200	CO (7) (11)	68.02	-	20, 21 <u>22</u> , 28, 29, 30, 34		29, 30, <u>34,</u> 38
		CO (7)	34.01	148.97	-		
		PM (7)	2.21	9.67	1		
		PM ₁₀ (7)	2.21	9.67			

Permit Numbers: 36644, PSDTX903M5 and N007M1					Issuance Date: 08/10/2023			
Emission Point No. (1)		Air	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements	
	Source Name (2)	Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information	
		PM _{2.5} (7)	2.21	9.67				
		VOC (7)	0.84	3.68	-			
		NO _x (7) (10)	70.68	-				
		NO _x (7)	35.34	116.08	-			
		SO ₂ (7)	3.22	7.07				
		CO (7) (11)	68.02	-	-			
N-3	Fresh Feed Cracking Furnace H-0300	CO (7)	34.01	148.97	20, <u>22,</u> 28, 29, 30, 34	20, -21, 29, 30, <u>34, </u> 35, 36, 38, 43	29, 30, <u>34, </u> 38	
		PM (7)	2.21	9.67				
		PM ₁₀ (7)	2.21	9.67				
		PM _{2.5} (7)	2.21	9.67				
		VOC (7)	0.84	3.68	-			
		NO _x (7) (10)	70.68	-				
		NO _x (7)	35.34	116.08				
N-4	Fresh Feed Cracking Furnace H-0400	SO ₂ (7)	3.22	7.07	20, <u>22,</u> 28, 29, 30, 34	20, 21, 29, 30, <u>34,</u> 35, 36, 38, 43	29, 30, <u>34,</u> 38	
		CO (7) (11)	68.02	-		50, 50, 45		
		CO (7)	34.01	148.97				

Permit Numbers	s: 36644, PSDTX903M5 an	d N007M1	Issuance Date: 08/10/2023				
Emission Point No. (1)		Air	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
	Source Name (2)	Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		PM (7)	2.21	9.67			
		PM ₁₀ (7)	2.21	9.67	_		
		PM _{2.5} (7)	2.21	9.67	_		
		VOC (7)	0.84	3.68	_		
		NO _x (7) (10)	70.68	-		20, 21, 29, 30, <u>34,</u> 35, 36, 38, 43	29, 30, <u>34, </u> 38
		NO _x (7)	35.34	116.08			
		SO ₂ (7)	3.22	7.07			
		CO (7) (11)	68.02	-			
N-5	Fresh Feed Cracking Furnace H-0500	CO (7)	34.01	148.97	20, <u>22,</u> 28, 29, 30, 34		
		PM (7)	2.21	9.67	_		
		PM ₁₀ (7)	2.21	9.67	_		
		PM _{2.5} (7)	2.21	9.67	_		
		VOC (7)	0.84	3.68	_		
		NO _x (7) (10)	70.68	-			
N-6	Fresh Feed Cracking Furnace H-0600	NO _x (7)	35.34	116.08	20, <u>22,</u> 28, 29, 30, 34	20, 21, 29, 30, <u>34,</u> 35, 36, 38, 43	29, 30, <u>34,</u> 38
		SO ₂ (7)	3.22	7.07			

Permit Numbers	s: 36644, PSDTX903M5 an	d N007M1	Issuance Date: 08/10/2023				
Emission Point No. (1)	Source Name (2)	Air	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
		Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		CO (7) (11)	68.02	-			
		CO (7)	34.01	148.97	-		
		PM (7)	2.21	9.67	-		
		PM ₁₀ (7)	2.21	9.67	-		
		PM _{2.5} (7)	2.21	9.67	-		
		VOC (7)	0.84	3.68	-		
		NO _x (7) (10)	70.68	-			29, 30, <u>34, </u> 38
		NO _x (7)	35.34	116.08			
		SO ₂ (7)	3.22	7.07	-		
		CO (7) (11)	68.02	-	-		
N-7	Fresh Feed Cracking Furnace H-0700	CO (7)	34.01	148.97	20, <u>22,</u> 28, 29, 30, 34	20, 21, 29, 30, <u>34,</u> 35, 36, 38, 43	
		PM (7)	2.21	9.67			
		PM ₁₀ (7)	2.21	9.67			
		PM _{2.5} (7)	2.21	9.67	-		
		VOC (7)	0.84	3.68			
N-8		NO _x (7) (10)	70.68	-	20, <u>22,</u> 28, 29, 30, 34		29, 30, <u>34, </u> 38

Permit Numbers	s: 36644, PSDTX903M5 ar	d N007M1	Issuance Date: 08/10/2023				
Emission Point No. (1)	Source Name (2)	Air	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
		Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Applicatior Information
		NO _x (7)	35.34	116.08			
		SO ₂ (7)	3.22	7.07	_		
		CO (7) (11)	68.02	-	_	20, 21, 29, 30, <u>34, </u> 35, 36, 38, 43	
	Fresh Feed Cracking	CO (7)	34.01	148.97	_		
	Furnace H-0800	PM (7)	2.21	9.67			
		PM ₁₀ (7)	2.21	9.67			
		PM _{2.5} (7)	2.21	9.67			
		VOC (7)	0.84	3.68			
		NO _x (7) (10)	48.75	-			
		NO _x (7)	12.19	21.35	_		
		SO ₂ (7)	5.60	24.53	_		
	Fresh Feed Cracking Furnace H-0900	CO (7) (11)	34.13	-	<u>17,</u> 20, 21,22, -28, 29,	<u>17,</u> 20, 21, 29, 30, <u>32,</u>	
N-9	(487.5 MMBtu/hr maximum)	CO (7)	17.06	74.73	<u>30, 32,</u> 34	<u>34,</u> 35, 36, 38, 43 , 45	29, 30, <u>32,</u> 34, 38
		PM (7)	3.63	15.91			
		PM ₁₀ (7)	3.63	15.91			
		PM _{2.5} (7)	3.63	15.91	1		

Permit Numbers	s: 36644, PSDTX903M5 and	N007M1	Issuance Date: 08/10/2023				
Emission Point No. (1)		Air	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
		Source Name (2)	Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information
		VOC (7)	2.63	11.51			
		NH ₃	1.98	8.68			
		NO _x (7) (10)	49.80	-			29, 30, <u>32,</u> 34, 38
		NO _x (7)	12.45	21.81	<u>17, 20, 22, 28, 29, 30,</u>	<u>17,</u> 20, 21, 29, 30, <u>32,</u> <u>34,</u> 35, 36, 38, 43	
		SO ₂ (7)	4.48	8.72			
		CO (7) (11)	69.72	-			
	Fresh Feed Cracking	CO (7)	17.43	76.34			
N-16	Furnace H-1000 (498 MMBtu/hr maximum)	PM (7)	2.49	10.91	<u>32,</u> 34		
		PM ₁₀ (7)	2.49	10.91			
		PM _{2.5} (7)	2.49	10.91			
		VOC (7)	2.69	11.76			
		NH₃	1.98	8.68	1		
	Catalyst Regeneration	VOC (7)	15.83	0.08			
N-10	Effluent	со	373.33	1.89		GC- 7	
N-11		СО	161.43	135.57		GC-7	

Permit Numbers	: 36644, PSDTX903M5 and	N007M1	Issuance Date: 08/10/2023				
Emission Point No. (1)	Source Name (2)	Air	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
		Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
	Reactor Regeneration Effluent (Startup, Shutdown, and Maintenance)	VOC (7)	0.13	0.11			
		NO _x (7)	5.01	13.71			
	DP Reactor Feed Heater	SO ₂ (7)	0.44	0.95	<u>6,</u> 20, <u>22,</u> 28, 29	<u>6. </u> 20, 29, 35	<u>6, </u> 29
		CO (7)	4.40	12.26			
N-12		PM (7)	0.38	1.64			
IN-12		PM ₁₀ (7)	0.38	1.64			
		PM _{2.5} (7)	0.38	1.64			
		VOC (7)	0.17	0.74			
	DP Reactor Feed Heater Startup Emission Rate	CO (7)	14.50	1.74	<u>6,</u> 20, <u>22,</u> 28, 29 <u>, 45, 55</u>	<u>6,</u> 20, 29, 35 <u>, 45, 55</u>	<u>6,</u> 29
		NO _x (7)	1.73	1.42			
		SO ₂ (7)	0.14	0.10	<u>6, 20, 22,</u> 28 , 29	<u>6, 20, 29, 35</u>	<u>6,29</u>
N-13	DP Reactor Regeneration Heater	CO (7)	2.37	3.13			
		PM (7)	0.13	0.17			
		PM ₁₀ (7)	0.13	0.17			

Permit Numbers	s: 36644, PSDTX903M5 an	d N007M1	Issuance Date: 08/10/2023				
Emission Point No. (1)	Source Name (2)	Air	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
		Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Applicatior Information
		PM _{2.5} (7)	0.13	0.17			
		VOC (7)	0.06	0.08	_		
		NOx	13.60	-			
		SO ₂	1.24	-	-		
		СО	15.60	-	_		
N-14	Auxiliary Boiler	PM	1.58	-	<u>4, 6, </u> 20, 21, <u>22,</u> 28, 29, 30, 34	<u>4, 6.</u> 20, 21, 29, 30, 34, 35, 36, 38	<u>4, 6,</u> 29, 30, 34, 38
		PM10	1.58	-			
		PM _{2.5}	1.58	-			
		VOC	1.58	-	_		
		NO _x	17.65	-			+
		SO ₂	4.53	-	_		
	GTG HRSG Unit 1	СО	89.51	-	_		
N-20A	GE Frame 6B, 310.4 MMBtu/hr Duct Burner	PM	5.55	-	<u>15, 17,</u> 28, 29, 30, 31, 32, 33, 34	<u>17,</u> 29, 30, 31, <u>32,</u> 33, 34, 35, 36, 38	29, 30, <u>32,</u> 34, 38
	(with SCR)	PM10	5.55	-		2 ., 00, 00, 00	
		PM _{2.5}	5.55	-			
		VOC	4.09	-	1		

Permit Numbers	s: 36644, PSDTX903M5 an	d N007M1	Issuance Date: 08/10/2023				
Emission Point No. (1)	Source Name (2)	Air	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
		Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Applicatior Information
		NH₃	7.61	28.20			
		NO _x	17.65	-			
		SO ₂	4.53	-		<u>17,</u> 29, 30, 31, <u>32,</u> 33, 34, 35, 36, 38	29, 30, <u>32, </u> 34, 38
	GTG HRSG Unit 2 GE Frame 6B, 310.4 MMBtu/hr Duct Burner (with SCR)	СО	89.51	-	<u>15, 17, </u> 28, 29, 30,-31, <u>32,</u> 33, 34		
		PM	5.55	-			
N-20B		PM10	5.55	-			
		PM _{2.5}	5.55	-			
		VOC	4.09	-			
		NH ₃	7.61	28.20			
Em	ission Point Nos. N-14, N	-20A, and N-20B a	re subject to tl	he following o	combined annual emissio	n caps for the specified	pollutants:
		NOx	-	102.96			
		SO ₂	-	8.27			
N-14, N-20A, and N-20B	Annual Emission Caps	СО	-	349.85	<u>15, 17, 28, 29, 3</u> 0, 31, <u>32,</u> 33, 34	<u>17, 29, </u> 30, 31, <u>32, </u> -33, 34, <u>35, </u> 36, 38	<u>29, </u> 30, <u>32, </u> 34, 38
		PM	-	46.78			
		PM ₁₀	-	46.78			

Permit Numbers	: 36644, PSDTX903M5 and	N007M1	Issuance Date: 08/10/2023				
Emission Point No. (1)		Air	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
	Source Name (2)	Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		PM _{2.5}	-	46.78			
		VOC	-	32.17	-		
	Emission Point Nos. N-15	and N-15A are s	ubject to the fo	llowing comb	bined annual emission ca	ps for the specified pollu	utants:
		VOC (7)	631.15	170.37			
	Flare System Emission Limits Applicable During Routine Operations Exclusive of Planned Turnarounds	NO _x (7)	252.70	45.57	4, <u>5, </u> 6, 13, 14, 37, <u>44,</u> 56	4, <u>5,</u> 6, 13, 14, 15, <u>35,</u> 37, <u>44,</u> 56	
		CO (7)	1046.49	176.01			4, <u>5, 6, 13</u>
		SO ₂ (7)	0.56	1.32			
		H ₂ S	<0.01	<0.01			
		VOC (7)	6788.14	169.10			
N-15 and N-15A	Flare System Emission	NO _x (7)	1068.91	35.83			
	Limits Applicable MSS Activities, Including	CO (7)	5276.94	174.20	4, <u>5,</u> 6, 13, 14, 37, <u>44,</u> 56	4, <u>5, </u> 6, 13, 14, <u>35, </u> 37, <u>44, 56</u>	4, <u>5, 6, 13</u>
	Planned Major and Minor Plant Turnarounds	SO ₂ (7)	17.12	1.46			
		H ₂ S	0.19	0.02			
		VOC (7) (15)	2778.73	-		4, <u>5,</u> 6, 13, 14, <u>35,</u> 37, <u>44,</u> 56	
	Acetylene Converter Swaps	NO _x (7) (15)	364.76	-	4, <u>5,</u> 6, 13, 14, 37, <u>44,</u> 56		4, <u>5, </u> 6 <u>, 13</u>
		CO (7) (15)	2634.43	-			

Permit Numbers	s: 36644, PSDTX903M5 and	I N007M1	Issuance Date: 08/10/2023				
Emission Point	Source Name (2)	Air	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
No. (1)		Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
	Flare System Emission Limits Applicable to all Operations	VOC	-	241.07			
		CO (7)	3,360.00	204.09			
	Decoking Drum	PM (7)	78.73	3.98			
N-18		PM ₁₀ (7)	78.73	3.98	- <u>22</u>		
		PM _{2.5} (7)	78.73	3.98			
		NO _x (7)	0.24	0.89		6, 19<u>18,</u> 29, 30, 35, 38<u>.</u> 44	
		SO ₂ (7)	0.08	0.28			6, 29, 30, 38
		CO (7)	0.21	0.78	_		
N-19	Thermal Oxidizer	PM (7)	0.04	0.13	6, 19<u>18</u>, 28, 29, 30<u>, 44</u>		
		PM ₁₀ (7)	0.04	0.13	_		
		PM _{2.5} (7)	0.04	0.13			
		VOC (7)	0.03	0.14			
		NO _x (7)	15.81	1.23			
N-21A	Fire Pump Diesel Engine (6)	SO ₂ (7)	1.05	0.08		GC- 7	
		CO (7)	3.41	0.27			

Permit Numbers	s: 36644, PSDTX903M5 and	I N007M1			Issuance Date: 08/10/2023			
Emission Point	Source Name (2)	Air Contaminant Name (3)	Emissio	n Rates	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements	
No. (1)			lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information	
		PM (7)	1.12	0.09				
		PM ₁₀ (7)	1.12	0.09				
		PM _{2.5} (7)	1.12	0.09				
		VOC (7)	1.26	0.10				
		NO _x (7)	15.81	1.23				
		SO ₂ (7)	1.05	0.08				
		CO (7)	3.41	0.27				
N-21B	Fire Pump Diesel Engine (6)	PM (7)	1.12	0.09		GC- 7		
		PM ₁₀ (7)	1.12	0.09				
		PM _{2.5} (7)	1.12	0.09				
		VOC (7)	1.26	0.10				
		VOC <u>(5)</u>	0.03	<0.01				
N-22	Carbon Bed Adsorber	Benzene	0.03	<0.01	<u>5, </u> 6, 20 19	<u>5, 6, 2019</u>	<u>5,</u> 6	
N-23	Ammonia Scrubber	NH ₃	0.12	0.51	<u>16</u> 17	<u>16</u> 17		
	Boiler B-7280 (425.4	VOC (7)	1.70	6.66	<u>4, 6, 17, 20, 21, 22, 28,</u>	<u>4, 6, 17, 20,</u> 21, 29, 30, <u>32,</u> 35, 36, 38	<u>4, 6,</u> 29, 30, <u>32,</u> 38	
N-24A	MMBtu/hr)	NO _x (Routine)	4.25	16.64	29, 30, 32			

Permit Numbers	s: 36644, PSDTX903M5 ar	nd N007M1			Issuance Date: 08/10/20	023	
Emission Point		Air	Emissio	n Rates	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
No. (1)	Source Name (2)	Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		NO _x (Startup) <u>(17)</u>	17.02	1.23			
		CO (7)	14.89	18.31			
		SO ₂	7.91	16.67	_		
		PM (7)	2.13	8.32	_		
		PM ₁₀ (7)	2.13	8.32	_		
		PM _{2.5} (7)	2.13	8.32	_		
		NH ₃	1.87	7.33	_		
		VOC (7)	1.70	6.66			
		NO _x (Routine)	4.25	16.64	_		
		NO _x (Startup) <u>(17)</u>	17.02	1.23	-		
N-24B	Boiler B-7290 (425.4	CO (7)	14.89	18.31	<u>4, 6, 17, 20, </u> 21, <u>22,</u> 28,	<u>4, 6, 17, 20, </u> 21, 29, 30,	<u>4, 6. 29, 30, 32, </u> 38
11-240	MMBtu/hr)	SO ₂	7.91	16.67	29, 30, 32	<u>32,</u> 35, 36, 38	<u>4, 0.</u> 23, 30, <u>32,</u> 30
		PM (7)	2.13	8.32			
		PM ₁₀ (7)	2.13	8.32	1		
		PM _{2.5} (7)	2.13	8.32	1		

Permit Numbers	s: 36644, PSDTX903M5 and	N007M1			Issuance Date: 08/10/2023			
Emission Point		Air	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements	
No. (1)	Source Name (2)	Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information	
		NH ₃	1.87	7.33				
N-24A and N-24B	Annual Cap - Boilers B- 7280 and B-7290	SO ₂	-	23.42	<u>4, 6, 17, 20, </u> 21, <u>22,</u> 28, 29 <u>, 30, 32</u>	<u>4, 6, 17, 20, </u> 21, 22, <u>29,</u> <u>30, 32, 35, </u> 36 <u>, 38</u>	<u>4, 6, </u> 29 <u>, 30, 32, 38</u>	
N-1 through N- 9, N-14, N-15, N-15A, N-16, N-19, N-20A, and N-20B	Fresh Feed Cracking Furnaces, Auxiliary Boiler, Flare System, Cogeneration Facility, and Thermal Oxidizer (9)	Mercury (9)	0.63	0.04	44 <u>42</u>	36, <u>42</u>44		
TK-2501	IFR Spent Caustic	VOC (7)	0.31	(16)	4 <u>, 5,</u> 6, 10 <u>, 50</u>	4 <u>, 5,</u> 6, 10 <u>, 50</u>	4, <u>5,</u> 6 , 10	
TK-2501B	Tank TK-2501B	VOC	0.41	(16)	4 <u>, 5, </u> 6, 10 <u>, 50</u>	4 <u>, 5, </u> 6, 10 <u>, 50</u>	4 <u>, 5,</u> 6, 10	
Tank TK- 2501/TK-2501B Annual Cap	Spent Caustic Tank Cap	VOC	-	0.44	4 <u>, 5, </u> 6, 10 <u>, 50</u>	4 <u>, 5, </u> 6, 10 <u>, 50</u>	4 , <u>5,</u> 6 , 10	
TK-8001	IFR WW Equalization	VOC (7)	0.39	0.62	6, 10	6, 10	6, 10	
TK-8101	EFR Contaminated Storm water	VOC (7)	0.51	0.47	10	10	10	
TK 7700		H ₂ SO ₄	0.01	0.01	10.54	40	40	
TK-7702	Sulfuric Acid Tank	SO ₃	0.01	0.01	- 10 <u>, 51</u>	10	10	
TK1701	Tank TK1701	VOC	4.58	0.01	10	10	10	
TK1702	Tank TK1702	VOC	1.65	0.01	10	10	10	
TK1703	Tank TK1703	VOC	1.12<u>1.20</u>	0.01	10	10	10	

Permit Numbers	:: 36644, PSDTX903M5 and	N007M1			Issuance Date: 08/10/2023			
Emission Point	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements	
No. (1)			lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information	
TK1704	Tank TK1704	VOC	1.55<u>1.61</u>	0.01<u>0.03</u>	10	10	10	
TK-CWT	Water Treatment Chemicals Storage	VOC	0.75	0.01	10	10	10	
F-1	Fugitives (12)	VOC (7)	11.96	52.41	4, 6, 9, 10, <u>48,</u> 4 9	4, 6, 9, <u>48,</u> 49 , 50	4, 6	
		PM (7)	1.19	4.60				
	Cooling Tower System	PM ₁₀ (7)	0.88	3.41	4, 6, 9, 10, 24, 25, 26, 49	4 , 6 , 9, 24, 25, 26, <u>27,</u> 49 , 50	4, 6, 24, 25, 26, 27	
F-2 and F-2A		PM _{2.5} (7)	<0.01	0.01				
		VOC (5) (7)	23.53	42.45				
		Benzene	0.46	1.77				
	Benzene/Toluene Process	VOC (7)	0.71	3.12				
F-4	Fugitives (12)	H ₂ S	0.01	0.02	4, 6, 9, <u>48,</u> 49	4, 6, 9, 48, <u>49 50</u>	4, 6	
F-5	C4 Huntsman Pipeline Fugitives (12)	VOC	0.01	0.05	4 , 6, 9, <u>48,</u> 49	4 , 6, 9, <u>48,</u> 49 , 50	4, 6, 9	
FUG-AMM	Ammonia Fugitives	NH ₃	0.05	0.20	7 <u>, 17, 48, 49</u>	7 <u>, 17, 48, 49</u>		
		VOC	< 0.01	< 0.01		36		
AH-98002	Analyzer Vent	SO ₂	< 0.01	< 0.01				
AH-009A	Analyzer Vent	VOC	< 0.01	< 0.01		36		

Permit Numbers	s: 36644, PSDTX903M5 and	N007M1			Issuance Date: 08/10/20)23	
Emission Point		Air Contaminant Name (3)	Emissio	n Rates	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
No. (1)	Source Name (2)		lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
AH-009B	Analyzer Vent	VOC	< 0.01	< 0.01		36	
AH-007	Analyzer Vent	VOC	< 0.01	< 0.01		36	
		F	LANNED TUR	NAROUND AI	ND MSS CAPs:		
		VOC	16.03	4.61			
	Turnaround CAP (Non- Flare)	PM	0.30	1.03	<u>45, 46, 47.</u> 48, 49 <u>, -</u> 51, <u>52, 53, 5558</u>	45, <u>46, 47,</u> 48, 49, 51 , <u>52, 53, </u> 58, GC-7	
TA CAP		PM ₁₀	0.02	0.06			
		PM _{2.5}	<0.01	0.01			
		VOC	19.12	4.76			
1100.0		PM	0.74	1.02	45, 46, <u>47, 48,</u> 49, 51,	44, 45, 46, <u>47, 48.</u> 49,	
MSS Cap	MSS CAP (Non-Flare)	PM ₁₀	0.24	0.06	<u>52, 53, 5558</u>	51, <u>52, 53</u>, <u>55,</u> 58	
		PM _{2.5}	0.03	0.01			
	Recycle Ethane Cracking	NOx	48.32	(13)	55		
N-1 Furna	Furnace H-0100 Startup	со	93.02	(13)	- <u>55</u>	44, 4 5, 5 4 <u>, 55</u>	
NO	Fresh Feed Cracking	NOx	70.68	(13)	55		
N-2	Furnace H-0200 Startup	СО	136.04	(13)	<u>55</u>	45, 5 4 <u>55</u>	

Permit Numbers	:: 36644, PSDTX903M5 and	1 N007M1				Issuance Date: 08/10/2023				
Emission Point		Air	Emissi	on Rates		Monitoring and Testing Requirements		Recordkeeping Requirements		Reporting Requirements
No. (1)	Source Name (2)	Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Applicati Information	ion	Special Condition/Applica Information	ition	Special Condition/Application Information
	Fresh Feed Cracking	NO _x	70.68	(13)	5	5	45,	54<u>, 55</u>		•
N-3	Furnace H-0300 Startup	со	136.04	(13)						
	Fresh Feed Cracking	NOx	70.68	(13)						
N-4	Furnace H-0400 Startup	со	136.04	(13)		<u>55</u>		45, 54<u>, 55</u>		
	Fresh Feed Cracking	NOx	70.68	(13)		55		45, 54 , 55		
	Furnace H-0500 Startup	СО	136.04	(13)		<u> </u>		40, 84<u>, 55</u>		
	Fresh Feed Cracking	NOx	70.68	(13)		<u>55</u>				
N-6	Furnace H-0600 Startup	СО	136.04	(13)				45, 5 4 <u>, 55</u>		
N 7	Fresh Feed Cracking H-	NO _x	70.68	(13)						
N-7	0700 Startup	СО	136.04	(13)		<u>55</u>		45, 54<u>, 55</u>		
	Fresh Feed Cracking H-	NOx	70.68	(13)						
N-8	0800 Startup	СО	136.04	(13)		<u>55</u>		45, 5 4 <u>, 55</u>		
	Fresh Feed Cracking H-	NOx	48.75	(13)						
N-9	0900 Startup	СО	34.13	(13)		<u>55</u>		45, <u>-5</u> 4 <u>, 55</u>		
N 40	Fresh Feed Cracking H-	NOx	49.80	(13)						
N-16	1900 Startup	СО	69.72	(13)		<u>55</u>		45, 54<u>, 55</u>		

Permit Numbers	: 36644, PSDTX903M5 and	N007M1			Issuance Date: 08/10/2023			
Emission Point		Air	Emissio	n Rates	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements	
No. (1)	Source Name (2)	Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information	
	DP Reactor Feed Heater	NO _x	15.02	(13)				
N-12	Startup	СО	14.52	(13)	<u>55</u>	45, 54<u>, 55</u>		
	DP Reactor Regeneration	NOx	3.45	(13)				
N-13	Heater	СО	4.74	(13)	<u>55</u>	45, 54<u>, 55</u>		
	A sublicas Deiles Otestus	NOx	27.12	(13)	55	45,- 5 4 <u>, 55</u>		
N-14	Auxiliary Boiler Startup	СО	31.19	(13)	<u>55</u>			
		NOx	123.53	(13)		45, <u>55, 5</u> 4		
N-20A	GTG HRSG Unit 1 Startup	СО	716.12	(13)	<u>55</u>			
		NO _x	123.53	(13)				
N-20B	GTG HRSG Unit 2 Startup	СО	716.12	(13)	<u>55</u>	45, 54<u>, 55</u>		
		NOx	17.02	(13)	55			
N-24A	Boiler B-7280 Startup	СО	29.78	(13)	<u>55</u>	45, 54<u>, 55</u>		
		NOx	17.02	(13)	55			
N-24B	N-24B Boiler B-7290 Startup		29.78	(13)	<u>55</u>	45, 5 4 <u>, 55</u>		
	Cogen Starting Engine Unit	VOC	0.01<u>0.50</u>	0.01<u>0.02</u>	50.00	50.00		
GTGENG-1	#20A (14)	NO _x	16.48	0.79	59 , 63	59 , 63		

Permit Numbers	s: 36644, PSDTX903M5 and	N007M1			Issuance Date: 08/10/20)23	
Emission Point No. (1) Source Name (2)		Air	Emission	Rates	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
	Source Name (2)	Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		СО	5.17	0.25			
		SO ₂	0.01	0.01			
		PM	0.71	0.03			
		PM10	0.71	0.03			
		PM _{2.5}	0.71	0.03			
		VOC	0.01<u>0.50</u>	0.01<u>0.02</u>			
		NOx	16.48	0.79			
		СО	5.17	0.25			
GTGENG-2	Cogen Starting Engine Unit #20B (14)	SO ₂	0.01	0.01	<u>59 63</u>	<u>59 63</u>	
		PM	0.71	0.03			
		PM10	0.71	0.03			
		PM _{2.5}	0.71	0.03			

(1) (2) (3)

Emission point identification - either specific equipment designation or EPN from plot plan. Specific point source name. For fugitive sources, use area name or fugitive source name. VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1 CO - carbon monoxide

NOx - total oxides of nitrogen SO2 - sulfur dioxide

SO3 - sulfur trioxide

PM - total particulate matter (PM), suspended in the atmosphere, including PM10 and PM2.5, as represented

PM10 - total PM equal to or less than 10 microns in diameter, including PM2.5, as represented

PM2.5 - PM equal to or less than 2.5 microns in diameter

H2S - hydrogen sulfide

H2SO4 - sulfuric acid

NH3 - ammonia

- (4) Compliance with annual emission limits (tons per year) is based on a 12-month rolling period.
- (5) The VOC emission rate is for total VOC, including benzene.
- (6) Emissions from the fire pump diesel engines are based on 156 hours per year operation. Non-emergency fire pump operations shall only occur between the hours of 8:00 a.m. and 5:00 p.m. (one engine at any one time.)
- (7) These emissions are permitted under PSD or Nonattainment review in addition to State.
- (8) Reserved.
- (9) Mercury shall be calculated and expressed as elemental mercury in any form or phase and shall include the mercury contained in any compound.
- (10) Emissions from startups and spikes in the short-term rate are authorized at this rate for up to 150 total hours in any 12-month period during which emissions from one or more furnaces (EPNs N-1 through N-8, N-9, and N-16) exceed the routine lbs/hr emission limit. Annual emissions are included in the rates of normal operations.
- (11) Emissions from startups and spikes in the short-term rate are authorized at this rate for up to 876 total hours in any 12-month period. Annual emissions are included in the rates of normal operations.
- (12) Emission rate is an estimate and compliance is demonstrated by meeting the requirements of the applicable special conditions and permit application representations.
- (13) Annual emission rates are included in each EPN's respective routine emission rates.
- (14) Each engine is authorized to operate for up to 96 total hours in any 12-month period.
- (15) Annual emissions are included in the Flare Systems' annual Emission Limits.
- (16) Annual emissions are included in the Caustic Tank Cap Annual Emission Limits.
- (17) Emissions from startups in the short-term rate are authorized at this rate for up to 144 hours per 12-month rolling period.

Permit Num	ber: GHGPSD	ТХЗ			Issuance Date: 08/24/2012					
Emission	Emission		Air Contaminant	Emissi	on Rates	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements		
Unit ID	Point No.	Source Name	Name	TPY ⁽²⁾	TPY CO_{2e} (2,3)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information		
			CO ₂	255,735						
H-1000	N-16	Ethylene Cracking	CH4	14.2	256,914	III.A.3-4, III.B.1.a,b,g, i,j, III.C.1-4, IV.A.1, 6,	III.A.3-4, III.B.1.c-g, j, IV.A.1.a-f, IV.A.3-9	I.D.1-2, IV.A.6, V.C		
		Furnace	N ₂ O	2.8		V.A-B				
		Two Steam	CO ₂	420,095						
B-7280 and B-7290	N-24A & N-24B	Package Boilers ⁽⁴⁾	CH4	22.0	421,399	III.A.3-4, III.B.2.g-h, III.C.1-4, IV.A.1, 6, V.A-B	III.A.3-4, III.B.2.a,b, IV.A.1.a-e, IV.A.3-9	I.D.1-2, IV.A.6, V.C		
			N ₂ O	4.4		V.A-D				
		Auxiliary Gas	CO ₂	117,786						
DB-1 (or GTG1-DB)	N-20A	Turbine Duct Burner	CH4	6.5	118,329	III.A.3-4, III.B.3.f,g, III.C.1-4, IV.A-B,	III.A.3-4, III.B.3.a, IV.A.1.a-e, IV.A.3-9	I.D.1-2, IV.A.6, V.C		
			N ₂ O	1.3		IV.A.1, 6, V.A-B				
		Auxiliary Gas	CO ₂	117,786						
DB-2 (or GTG2-DB)	N-20B	Turbine Duct Burner	CH4	6.5	118,329	III.C.1-4, IV.A-B,	III.A.3-4, III.B.3.a, IV.A.1.a-e, IV.A.3-9	I.D.1-2, IV.A.6, V.C		
			N ₂ O	1.3		IV.A.1, 6, V.A-B				
D-1801	N-18	Decoking Drum (10 th Furnace Operations Only)	CO ₂	571	571	III.B.1.f, IV.A.1	IV.A.1.a,f, IV.A.3-9	I.D.1-2, IV.A.6		

Permit Numb	per: GHGPSD	ГХЗ			Issuance Date: 08/24/2012					
Emission Unit ID	Emission Point No.		Air Contaminant	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements		
		Source Name	Name	TPY ⁽²⁾	TPY CO_{2e} (2,3)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information		
P-FUG	F-1	Fugitives (10 th Furnace Project Only)	CH4	N/A	N/A	III.B.4.a, IV.A.1,	IV.A.1.a, e, IV.A.2, IV.A.3-6, 9	IV.A.6		
HFC-FUG	F-5	HFC-Containing Equipment (10 th Furnace Project Only)	HFCs	N/A	N/A	N/A	III.B.5.b, IV.A.1.a, IV.A.3-6, 9	IV.A.6		

(1) (2) Compliance with the annual emission limits (tons per year) is based on a 365-day total, rolled daily. The TPY emission limits specified in this table are not to be exceeded for this facility and include emissions only from the facility during all operations and include MSS activities.

Global Warming Potentials (GWP): $CH_4 = 21$, $N_20 = 310$

(3) (4) The steam package boilers have a combined annual refinery fuel gas (RFG) firing limit equivalent to one boiler firing RFG at capacity for 8,760 hrs. per year. From: Kyle Murray <Kyle.Murray@tceq.texas.gov>
Sent: Monday, March 31, 2025 9:37 AM
To: Tammy Villarreal <TVillarreal@clara-vista.com>
Cc: BTPEnvironmental <BTPEnvironmental@basf.com>; Theresa Hulvey <thulvey@clara-vista.com>; Lois
McQuade <LMcQuade@clara-vista.com>; Jacob Benfield <jacob.benfield@basf.com>
Subject: RE: [EXT] Working Draft Permit -- FOP 02551/Project 36831, BASF TOTALEnergies
Petrochemicals, LLC

My apologies. Here is the attached WDP.

Sincerely,

Kyle J. Murray

Permit Reviewer OA/Air Permits Division/OP Section Texas Commission on Environmental Quality MC 163, P.O. Box 13087 Austin, TX 78711-3087 kyle.murray@tceq.texas.gov

Phone: (512) 239-1279 Fax: (512) 239-1400



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

From: Tammy Villarreal <<u>TVillarreal@clara-vista.com</u>>
Sent: Monday, March 31, 2025 9:33 AM
To: Kyle Murray <<u>Kyle.Murray@tceq.texas.gov</u>>
Cc: BTPEnvironmental <<u>BTPEnvironmental@basf.com</u>>; Theresa Hulvey <<u>thulvey@clara-vista.com</u>>; Lois
McQuade <<u>LMcQuade@clara-vista.com</u>>; Jacob Benfield <<u>jacob.benfield@basf.com</u>>; Subject: RE: [EXT] Working Draft Permit -- FOP O2551/Project 36831, BASF TOTALEnergies
Petrochemicals, LLC

Good morning Mr. Murray,

Thanks for the feedback and we will make the correction. I think you meant to include the WDP but nothing was attached to your email. Please send the WDP. Thanks, Tammy

Tammy Villarreal, P.E. Clara Vista Environmental, LLC (281) 728-4093 From: Kyle Murray <Kyle.Murray@tceq.texas.gov>
Sent: Monday, March 31, 2025 6:30 AM
To: Tammy Villarreal <TVillarreal@clara-vista.com>
Cc: BTPEnvironmental <BTPEnvironmental@basf.com>; Theresa Hulvey <thulvey@clara-vista.com>; Lois
McQuade <LMcQuade@clara-vista.com>; Jacob Benfield <jacob.benfield@basf.com>
Subject: RE: [EXT] Working Draft Permit -- FOP O2551/Project 36831, BASF TOTALEnergies
Petrochemicals, LLC

Good morning Ms. Villarreal,

I have reviewed the documents and updated your permit according to your responses on 03/04 and 03/10. I did find one minor issue with the updates to the OP-SUMR, however. For the added Unit IDs F-1, F-4, N-15, and N-15A, please add the effective version date (not the date in which it was registered) that you are complying with for each PBR. It is correct to include the registration number, but the effective dates for each PBR will need to be updated. (For example, 106.261/11/01/2003[160345], the version date is used here instead of the PBR registration date) The effective dates of PBRs can be found here: Home - Rules & Meetings

Please address the item above, review the revised WDP, and provide me with any further comments you may have by **Tuesday, April 8th.** If you have no comments, please indicate your approval and we will proceed towards public notice. Thank you!

Sincerely,

Kyle J. Murray

Permit Reviewer OA/Air Permits Division/OP Section Texas Commission on Environmental Quality MC 163, P.O. Box 13087 Austin, TX 78711-3087 kyle.murray@tceq.texas.gov

Phone: (512) 239-1279 Fax: (512) 239-1400



How are we doing? Fill out our online customer satisfaction survey at <u>www.tceq.texas.gov/customersurvey</u>

From:	Tammy Villarreal <tvillarreal@clara-vista.com></tvillarreal@clara-vista.com>
Sent:	Wednesday, March 19, 2025 4:52 PM
То:	Kyle Murray
Cc:	BTPEnvironmental; Theresa Hulvey; Lois McQuade; Tammy Villarreal; jacob.benfield@basf.com
Subject:	RE: [EXT] Working Draft Permit FOP O2551/Project 36831, BASF TOTALEnergies Petrochemicals, LLC
Attachments:	BTP Forms Submittal 3-19-2025.pdf; WDP - O2551 BASF TOTALEnergies Petrochemicals, LLC (Renewal, 36831)_Major NSR markup.docx

Good afternoon Mr. Murray,

On behalf of BASF TotalEnergies Petrochemicals, LLC (BTP), please find our responses below and corresponding attachments in answer to your emailed questions regarding the pending renewal for Operating Title V Permit No. 02551. The signed OP-CRO1 will be mailed at a later date but we have included a PDF of it for completeness. Please feel free to contact Jacob Benfield at BTP or myself if you should have any additional questions.

Best Regards, Tammy

Tammy Villarreal, P.E.

Clara Vista Environmental, LLC (281) 728-4093

Permit Numbers	s: 36644, PSDTX903M5 and	N007M1	Issuance Date: 08/10/2023				
Emission Point	Source Name (2)	Air	Emissio	on Rates	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
No. (1)		Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		NO _x (7) (10)	48.32	-			
		NO _x (7)	24.16	79.37			
		SO ₂ (7)	2.21	4.83	20 <u>, 22,</u> 28, 29, 30, 34	20, 21 , 29, 30, <u>34,</u> 35, 36, 38, 43	29, 30, <u>34, </u> 38
N-1 Recycle Ethane Cra		CO (7) (11)	46.50	-			
	Recycle Ethane Cracking Furnace H-0100	CO (7)	23.25	101.85			
		PM (7)	1.51	6.61		00,00,10	
		PM ₁₀ (7)	1.51	6.61			
		PM _{2.5} (7)	1.51	6.61			
		VOC (7)	0.57	2.51			
		NO _x (7) (10)	70.68	-			
		NO _x (7)	35.34	116.08			
		SO ₂ (7)	3.22	7.07			
N-2	Fresh Feed Cracking Furnace H-0200	CO (7) (11)	68.02	-	20, 21 <u>22</u> , 28, 29, 30, 34	20, -21 , 29, 30, <u>34,</u> 35, 36, 38, 43	29, 30, <u>34, </u> 38
		CO (7)	34.01	148.97			
		PM (7)	2.21	9.67			
		PM ₁₀ (7)	2.21	9.67	1		

Permit Numbers	s: 36644, PSDTX903M5 an	d N007M1			Issuance Date: 08/10/2023			
Emission Point		Air	Emissio	on Rates	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements	
No. (1)	Source Name (2)	Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information	
		NO _x (Startup) <u>(17)</u>	17.02	1.23				
		CO (7)	14.89	18.31				
		SO ₂	7.91	16.67				
		PM (7)	2.13	8.32	-			
		PM ₁₀ (7)	2.13	8.32	-			
		PM _{2.5} (7)	2.13	8.32	-			
		NH ₃	1.87	7.33				
		VOC (7)	1.70	6.66				
		NO _x (Routine)	4.25	16.64	-			
		NO _x (Startup) <u>(17)</u>	17.02	1.23	-			
N-24B	Boiler B-7290 (425.4	CO (7)	14.89	18.31	<u>4, 6, 17, 20, </u> 21, <u>22, </u> 28,	<u>4, 6, 17, 20, </u> 21, 29, 30,	<u>4, 6. 29, 30, 32, </u> 38	
MMBtu/	MMBtu/hr)	SO ₂	7.91	16.67	29, 30, 32	<u>32,</u> 35, 36, 38	<u>4, 0.</u> 29, 30, <u>32,</u> 30	
		PM (7)	2.13	8.32				
		PM ₁₀ (7)	2.13	8.32	-			
		PM _{2.5} (7)	2.13	8.32	-			

Permit Numbers	s: 36644, PSDTX903M5 an	d N007M1	Issuance Date: 08/10/2023				
Emission Point No. (1)	Source Name (2)	Air	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
		Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		PM _{2.5} (7)	2.21	9.67			
		VOC (7)	0.84	3.68	_		
		NO _x (7) (10)	70.68	-			
		NO _x (7)	35.34	116.08	 20, <u>22, </u> 28, 29, 30, 34		29, 30, <u>34, </u> 38
	Fresh Feed Cracking Furnace H-0300	SO ₂ (7)	3.22	7.07			
		CO (7) (11)	68.02	-			
N-3		CO (7)	34.01	148.97		20, 21, 29, 30, <u>34,</u> 35, 36, 38, 43	
		PM (7)	2.21	9.67			
		PM ₁₀ (7)	2.21	9.67	_		
		PM _{2.5} (7)	2.21	9.67	_		
		VOC (7)	0.84	3.68	_		
		NO _x (7) (10)	70.68	-			
		NO _x (7)	35.34	116.08	1		
N-4	Fresh Feed Cracking Furnace H-0400	SO ₂ (7)	3.22	7.07	20, <u>22,</u> 28, 29, 30, 34	20, 21, 29, 30, <u>34, </u> 35, 36, 38, 43	29, 30, <u>34, </u> 38
		CO (7) (11)	68.02	-		30, 00, 10	20, 00, <u>01,</u> 00
		CO (7)	34.01	148.97	-		

Permit Numbers	s: 36644, PSDTX903M5 an	d N007M1			Issuance Date: 08/10/2023			
Emission Point	Source Name (2)	Air	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements	
No. (1)		Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information	
		PM (7)	2.21	9.67				
		PM ₁₀ (7)	2.21	9.67	-			
		PM _{2.5} (7)	2.21	9.67	-			
		VOC (7)	0.84	3.68	-			
		NO _x (7) (10)	70.68	-	_		29, 30, <u>34,</u> 38	
		NO _x (7)	35.34	116.08				
		SO ₂ (7)	3.22	7.07				
		CO (7) (11)	68.02	-		20, 21, 29, 30, <u>34,</u> 35, 36, 38, 43		
N-5	Fresh Feed Cracking Furnace H-0500	CO (7)	34.01	148.97	20, <u>22, </u> 28, 29, 30, 34			
		PM (7)	2.21	9.67	-			
		PM ₁₀ (7)	2.21	9.67	-			
		PM _{2.5} (7)	2.21	9.67	-			
		VOC (7)	0.84	3.68	-			
		NO _x (7) (10)	70.68	-				
N-6	Fresh Feed Cracking Furnace H-0600	NO _x (7)	35.34	116.08	20, <u>22, </u> 28, 29, 30, 34	20, 21, 29, 30, <u>34,</u> 35, 36, 38, 43	5, 29, 30, <u>34, </u> 38	
		SO ₂ (7)	3.22	7.07				

Permit Numbers	: 36644, PSDTX903M5 an	d N007M1	Issuance Date: 08/10/2023				
Emission Point No. (1)	Source Name (2)	Air	Emissio	on Rates	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
		Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		CO (7) (11)	68.02	-			
		CO (7)	34.01	148.97	_		
		PM (7)	2.21	9.67	_		
		PM ₁₀ (7)	2.21	9.67	_		
		PM _{2.5} (7)	2.21	9.67	_		
		VOC (7)	0.84	3.68	_		
		NO _x (7) (10)	70.68	-	-		
		NO _x (7)	35.34	116.08			
		SO ₂ (7)	3.22	7.07			
		CO (7) (11)	68.02	-			
N-7	Fresh Feed Cracking Furnace H-0700	CO (7)	34.01	148.97	20, <u>22, </u> 28, 29, 30, 34	20, 21, 29, 30, <u>34, </u> 35, 36, 38, 43	29, 30, <u>34, </u> 38
		PM (7)	2.21	9.67			
		PM ₁₀ (7)	2.21	9.67			
		PM _{2.5} (7)	2.21	9.67	-		
		VOC (7)	0.84	3.68			
N-8		NO _x (7) (10)	70.68	-	20, <u>22,</u> 28, 29, 30, 34		29, 30, <u>34, </u> 38

Permit Numbers	s: 36644, PSDTX903M5 ar	d N007M1	Issuance Date: 08/10/2023				
Emission Point	Source Name (2)	Air	Emissio	on Rates	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
No. (1)		Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		NO _x (7)	35.34	116.08			
		SO ₂ (7)	3.22	7.07	-		
		CO (7) (11)	68.02	-	_		
	Fresh Feed Cracking	CO (7)	34.01	148.97	_	20, 21, 29, 30, <u>34,</u> 35, 36, 38, 43	
	Furnace H-0800	PM (7)	2.21	9.67	_		
		PM ₁₀ (7)	2.21	9.67	-		
		PM _{2.5} (7)	2.21	9.67			
		VOC (7)	0.84	3.68	_		
		NO _x (7) (10)	48.75	-			
		NO _x (7)	12.19	21.35	_		
		SO ₂ (7)	5.60	24.53	_		
	Fresh Feed Cracking Furnace H-0900	CO (7) (11)	34.13	-	<u>17,</u> 20, 21, 22, -28, 29,	<u>17,</u> 20, 21, 29, 30, <u>32,</u>	
N-9 (4	(487.5 MMBtu/hr maximum)	CO (7)	17.06	74.73	<u>30, 32,</u> 34	<u>34,</u> 35, 36, 38, 43 , 45	29, 30, <u>32,</u> 34, 38
		PM (7)	3.63	15.91			
		PM ₁₀ (7)	3.63	15.91	-		
		PM _{2.5} (7)	3.63	15.91	1		

Permit Numbers	:: 36644, PSDTX903M5 and	N007M1	Issuance Date: 08/10/2023				
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 Condition/Application Information	Special Condition/Application Information
		VOC (7)	2.63	11.51			
		NH ₃	1.98	8.68	-		
		NO _x (7) (10)	49.80	-			
	NO _x (7)	12.45	21.81				
		SO ₂ (7)	4.48	8.72	<u>17, 20, 22, 28, 29, 30,</u>	<u>17,</u> 20, 21, 29, 30, <u>32,</u> <u>34,</u> 35, 36, 38, 43	29, 30, <u>32, </u> 34, 38
		CO (7) (11)	69.72	-			
	Fresh Feed Cracking	CO (7)	17.43	76.34			
N-16	Furnace H-1000 (498 MMBtu/hr maximum)	PM (7)	2.49	10.91	<u>32,</u> 34		
		PM ₁₀ (7)	2.49	10.91			
		PM _{2.5} (7)	2.49	10.91	-		
		VOC (7)	2.69	11.76			
		NH ₃	1.98	8.68			
Catalyst Regeneration	Catalyst Regeneration	VOC (7)	15.83	0.08			
N-10	Effluent	со	373.33	1.89		GC- 7	
N-11		со	161.43	135.57		GC- 7	

Permit Numbers	:: 36644, PSDTX903M5 and	N007M1	Issuance Date: 08/10/2023				
Emission Point No. (1)	Source Name (2)	Air	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
		Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
	Reactor Regeneration Effluent (Startup, Shutdown, and Maintenance)	VOC (7)	0.13	0.11			
		NO _x (7)	5.01	13.71			
		SO ₂ (7)	0.44	0.95		<u>6, 20, 29, 35</u>	<u>6, </u> 29
	DP Reactor Feed Heater	CO (7)	4.40	12.26			
N-12		PM (7)	0.38	1.64	<u>6, </u> 20, <u>22, </u> 28, 29		
IN-12		PM ₁₀ (7)	0.38	1.64			
		PM _{2.5} (7)	0.38	1.64			
		VOC (7)	0.17	0.74			
	DP Reactor Feed Heater Startup Emission Rate	CO (7)	14.50	1.74	<u>6,</u> 20, <u>22,</u> 28, 29 <u>, 45, 55</u>	<u>6,</u> 20,29,35 <u>,45,55</u>	<u>6,</u> 29
		NO _x (7)	1.73	1.42			
		SO ₂ (7)	0.14	0.10			
N-13	DP Reactor Regeneration Heater	CO (7)	2.37	3.13	<u>6, 20, 22, </u> 28, 29	<u>6, 20, 29, 35</u>	<u>6,29</u>
		PM (7)	0.13	0.17			
		PM ₁₀ (7)	0.13	0.17	1		

Permit Numbers	s: 36644, PSDTX903M5 an	d N007M1	Issuance Date: 08/10/2023				
Emission Point No. (1)		Air	Emissio	on Rates	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
	Source Name (2)	Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		PM _{2.5} (7)	0.13	0.17			
		VOC (7)	0.06	0.08	_		
		NOx	13.60	-			
		SO ₂	1.24	-	<u>4, 6, 20, 21, 22,</u> 28, 29, 30, 34	<u>4, 6.</u> 20, 21, 29, 30, 34, 35, 36, 38	<u>4. 6. </u> 29, 30, 34, 38
	Auxiliary Boiler	СО	15.60	-			
N-14		PM	1.58	-			
		PM10	1.58	-			
		PM _{2.5}	1.58	-			
		VOC	1.58	-			
		NO _x	17.65	-			
		SO ₂	4.53	-			
	GTG HRSG Unit 1	со	89.51	-			
N-20A	GE Frame 6B, 310.4 MMBtu/hr Duct Burner	PM	5.55	-	<u>15, 17,</u> 28, 29, 30, 31, 32, 33, 34	<u>17,</u> 29, 30, 31, <u>32,</u> 33, 34, 35, 36, 38	29, 30, <u>32, </u> 34, 38
	(with SCR)	PM ₁₀	5.55	-			
		PM _{2.5}	5.55	-	1		
		VOC	4.09	-	1		

Permit Numbers	s: 36644, PSDTX903M5 an	d N007M1	Issuance Date: 08/10/20	Issuance Date: 08/10/2023			
Emission Point No. (1)		Air	Emissio	n Rates	Monitoring and Testing RequirementsRecordkeeping Requirements		Reporting Requirements
	Source Name (2)	Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Applicatior Information
		NH ₃	7.61	28.20			
		NOx	17.65	-			
		SO ₂	4.53	-	<u>15, 17, 28, 29, 30,-31,</u> <u>32,</u> 33, 34		
		СО	89.51	-		<u>17,</u> 29, 30, 31, <u>32,</u> 33, 34, 35, 36, 38	29, 30, <u>32,</u> 34, 38
	GTG HRSG Unit 2 GE Frame 6B, 310.4 MMBtu/hr Duct Burner (with SCR)	PM	5.55	-			
N-20B		PM10	5.55	-			
		PM _{2.5}	5.55	-			
		VOC	4.09	-			
		NH ₃	7.61	28.20			
Em	ission Point Nos. N-14, N-		re subject to th	-	ombined annual emissio	n caps for the specified p	pollutants:
		NOx	-	102.96	_		
		SO ₂	-	8.27			
N-14, N-20A, and N-20B	Annual Emission Caps	со	-	349.85	<u>15, 17, 28, 29, </u> 30, 31, <u>32,</u> 33, 34	<u>17, 29, </u> 30, 31, <u>32,</u> -33, 34, <u>35, </u> 36, 38	<u>29, </u> 30, <u>32, </u> 34, 38
		PM	-	46.78		, <u></u> ,,	
		PM10	-	46.78]		

Permit Numbers	: 36644, PSDTX903M5 and	N007M1	Issuance Date: 08/10/20)23			
Emission Point No. (1)	Source Name (2)	Air	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
		Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Applicatior Information
		PM _{2.5}	-	46.78			
		VOC	-	32.17	-		
	Emission Point Nos. N-15	and N-15A are s	ubject to the fo	llowing comb	bined annual emission ca	ps for the specified pollu	itants:
		VOC (7)	631.15	170.37			
	Flare System Emission	NO _x (7)	252.70	45.57	-	4 <u>, 5,</u> 6, 13, 14, 15, <u>35,</u> 37, <u>44, </u>56	
	Limits Applicable During Routine Operations Exclusive of Planned Turnarounds	CO (7)	1046.49	176.01	4, <u>5,</u> 6, 13, 14, 37, <u>44,</u> 56		4, <u>5, 6, 13</u>
		SO ₂ (7)	0.56	1.32			
		H ₂ S	<0.01	<0.01			
		VOC (7)	6788.14	169.10			
N-15 and N-15A	Flare System Emission	NO _x (7)	1068.91	35.83			
	Limits Applicable MSS Activities, Including	CO (7)	5276.94	174.20	4, <u>5,</u> 6, 13, 14, 37, <u>44,</u> 56	4, <u>5, </u> 6, 13, 14, <u>35, </u> 37, <u>44,-</u> 56	4, <u>5, 6, 13</u>
	Planned Major and Minor Plant Turnarounds	SO ₂ (7)	17.12	1.46		<u>,</u>	
		H ₂ S	0.19	0.02			
		VOC (7) (15)	2778.73	-			
	Acetylene Converter Swaps	NO _x (7) (15)	364.76	-	4, <u>5,</u> 6, 13, 14, 37, <u>44,</u> 56	4, <u>5,</u> 6, 13, 14, <u>35,</u> 37, <u>44,</u> 56	4, <u>5, 6, 13</u>
		CO (7) (15)	2634.43	-			

Permit Numbers	s: 36644, PSDTX903M5 and	I N007M1	Issuance Date: 08/10/2023				
Emission Point	Source Name (2)	Air	Emissio	n Rates	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
No. (1)		Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
	Flare System Emission Limits Applicable to all Operations	VOC	-	241.07			
		CO (7)	3,360.00	204.09			
N 40		PM (7)	78.73	3.98			
N-18 Decoking Drum	Decoking Drum	PM ₁₀ (7)	78.73	3.98	- <u>22</u>		
		PM _{2.5} (7)	78.73	3.98			
		NO _x (7)	0.24	0.89	-		
		SO ₂ (7)	0.08	0.28			
		CO (7)	0.21	0.78			
N-19	Thermal Oxidizer	PM (7)	0.04	0.13	6, 19<u>18</u>, 28, 29, 30<u>, 44</u>	6, 19<u>18</u>, 29, 30, 35, 38<u>,</u> <u>44</u>	6, 29, 30, 38
		PM ₁₀ (7)	0.04	0.13			
		PM _{2.5} (7)	0.04	0.13			
		VOC (7)	0.03	0.14	1		
		NO _x (7)	15.81	1.23			
N-21A	Fire Pump Diesel Engine (6)	SO ₂ (7)	1.05	0.08		GC- 7	
		CO (7)	3.41	0.27			

Permit Numbers	s: 36644, PSDTX903M5 and	I N007M1			Issuance Date: 08/10/2023			
Emission Point No. (1)		Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements	
	Source Name (2)		lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information	
		PM (7)	1.12	0.09				
		PM ₁₀ (7)	1.12	0.09				
		PM _{2.5} (7)	1.12	0.09				
		VOC (7)	1.26	0.10				
		NO _x (7)	15.81	1.23				
		SO ₂ (7)	1.05	0.08				
		CO (7)	3.41	0.27				
N-21B	Fire Pump Diesel Engine (6)	PM (7)	1.12	0.09	-	GC -7		
		PM ₁₀ (7)	1.12	0.09				
		PM _{2.5} (7)	1.12	0.09				
		VOC (7)	1.26	0.10				
		VOC <u>(5)</u>	0.03	<0.01	5 0 00/0	5 0 0010		
N-22	Carbon Bed Adsorber	Benzene	0.03	<0.01	- <u>5, </u> 6, 20 <u>19</u>	<u>5, 6, 2019</u>	<u>5,</u> 6	
N-23	Ammonia Scrubber	NH ₃	0.12	0.51	<u>16</u> 17	<u>16</u> 17		
N 044	Boiler B-7280 (425.4 MMBtu/hr)	VOC (7)	1.70	6.66	<u>4, 6, 17, 20, 21, 22, 28,</u>	, <u>4, 6. 17, 20, </u> 21, 29, 30, <u>32, 3</u> 5, 36, 38), <u>4, 6, </u> 29, 30, <u>32,</u> 38	
N-24A		NO _x (Routine)	4.25	16.64	<u>4, 6, 17, 20,</u> 21, <u>22,</u> 28, 29, 30, 32			

Permit Numbers	:: 36644, PSDTX903M5 and	N007M1	Issuance Date: 08/10/2023				
Emission Point		Air	Emissio	n Rates	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
No. (1)	Source Name (2)	Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		NH ₃	1.87	7.33			
N-24A and N-24B	Annual Cap - Boilers B- 7280 and B-7290	SO ₂	-	23.42	<u>4, 6, 17, 20, </u> 21, <u>22,</u> 28, 29 <u>, 30, 32</u>	<u>4, 6, 17, 20, </u> 21 , 22, <u>29,</u> <u>30, 32, 35,</u> 36 , <u>38</u>	<u>4, 6, 29, 30, 32, 38</u>
N-1 through N- 9, N-14, N-15, N-15A, N-16, N-19, N-20A, and N-20B	Fresh Feed Cracking Furnaces, Auxiliary Boiler, Flare System, Cogeneration Facility, and Thermal Oxidizer (9)	Mercury (9)	0.63	0.04	44 <u>42</u>	36, <u>42</u>44	
TK-2501	IFR Spent Caustic	VOC (7)	0.31	(16)	4 <u>, 5,</u> 6, 10 <u>, 50</u>	4 <u>, 5, </u> 6, 10 <u>, 50</u>	4 <u>, 5,</u> 6, 10
TK-2501B	Tank TK-2501B	VOC	0.41	(16)	4 <u>, 5, </u> 6, 10 <u>, 50</u>	4 <u>, 5, </u> 6, 10 <u>, 50</u>	4 <u>, 5,</u> 6, 10
Tank TK- 2501/TK-2501B Annual Cap	Spent Caustic Tank Cap	VOC	-	0.44	4 <u>, 5, </u> 6, 10 <u>, 50</u>	4 <u>, 5, </u> 6, 10 <u>, 50</u>	4 <u>, 5, </u> 6, 10
TK-8001	IFR WW Equalization	VOC (7)	0.39	0.62	6, 10	6, 10	6, 10
TK-8101	EFR Contaminated Storm water	VOC (7)	0.51	0.47	10	10	10
TK 7700		H ₂ SO ₄	0.01	0.01	10.54	10	40
TK-7702	Sulfuric Acid Tank	SO ₃	0.01	0.01	- 10 <u>, 51</u>	10	10
TK1701	Tank TK1701	VOC	4.58	0.01	10	10	10
TK1702	Tank TK1702	VOC	1.65	0.01	10	10	10
TK1703	Tank TK1703	VOC	1.12<u>1.20</u>	0.01	10	10	10

Permit Numbers	:: 36644, PSDTX903M5 and	N007M1	Issuance Date: 08/10/2023				
Emission Point		Air	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
No. (1)	Source Name (2)	Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
TK1704	Tank TK1704	VOC	1.55<u>1.61</u>	0.01<u>0.03</u>	10	10	10
TK-CWT	Water Treatment Chemicals Storage	VOC	0.75	0.01	10	10	10
F-1	Fugitives (12)	VOC (7)	11.96	52.41	4, 6, 9, 10, <u>48,</u> 4 9	4, 6, 9, <u>48,</u> 49 , 50	4, 6
	Cooling Tower System	PM (7)	1.19	4.60	4,-6, 9, 10, 24, 25, 26, 49	4 , 6 , 9, 24, 25, 26, <u>27,</u> 49 , 50	4 , 6 , 24, 25, 26, 27
		PM ₁₀ (7)	0.88	3.41			
F-2 and F-2A		PM _{2.5} (7)	<0.01	0.01			
		VOC (5) (7)	23.53	42.45			
		Benzene	0.46	1.77			
	Benzene/Toluene Process	VOC (7)	0.71	3.12	4, 6, 9, <u>48,</u> 49	4, 6, 9, 48, <u>49 50</u>	4, 6
F-4	Fugitives (12)	H₂S	0.01	0.02			
F-5	C4 Huntsman Pipeline Fugitives (12)	VOC	0.01	0.05	4 , 6, 9, <u>48, </u> 49	4 , 6, 9, <u>48,</u> 49 , 50	4, 6, 9
FUG-AMM	Ammonia Fugitives	NH ₃	0.05	0.20	7 <u>, 17, 48, 49</u>	7 <u>, 17, 48, 49</u>	
		VOC	< 0.01	< 0.01		36	
AH-98002	Analyzer Vent	SO ₂	< 0.01	< 0.01			
AH-009A	Analyzer Vent	VOC	< 0.01	< 0.01		36	

Permit Numbers	s: 36644, PSDTX903M5 and	N007M1			Issuance Date: 08/10/20)23	
Emission Point No. (1)		Air	Emissio	n Rates	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
	Source Name (2)	Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Applicatior Information
AH-009B	Analyzer Vent	VOC	< 0.01	< 0.01		36	
AH-007	Analyzer Vent	VOC	< 0.01	< 0.01		36	
		F	PLANNED TUR	NAROUND AI	ND MSS CAPs:		
	Turnaround CAP (Non- Flare)	VOC	16.03	4.61	<u>45, 46, 47. </u> 48 , 49 , <u>-</u> 51 , <u>52, 53, 5558</u>	45, <u>46, 47, </u> 48, 49, 5 4, <u>52, 53, </u> 58, GC-7	
		PM	0.30	1.03			
TA CAP		PM ₁₀	0.02	0.06			
		PM _{2.5}	<0.01	0.01			
		VOC	19.12	4.76		44, 45, 46, <u>47, 48.</u> 49, 51, <u>52, 53</u>,55, 58	
M00.0		PM	0.74	1.02	45, 46, <u>47, 48,</u> 49, 51,		
MSS Cap	MSS CAP (Non-Flare)	PM ₁₀	0.24	0.06	<u>52, 53, 5558</u>		
		PM _{2.5}	0.03	0.01			
N-1	Recycle Ethane Cracking	NOx	48.32	(13)	55	44 45 54 55	
IN- I	Furnace H-0100 Startup	СО	93.02	(13)	- <u>55</u>	44 , 4 5, 5 4 <u>, 55</u>	
N-2	Fresh Feed Cracking	NOx	70.68	(13)	55	45 5455	
IN-Z	Furnace H-0200 Startup	СО	136.04	(13)	<u>55</u>	45, 5 4 <u>55</u>	

Permit Numbers	:: 36644, PSDTX903M5 and	I N007M1	Issuance Date: 08/10/2023					
Emission Point No. (1)		Air	Emissi	ion Rates		Monitoring and Testing Requirement	nts Recordkeeping Requirements	Reporting Requirements
	Source Name (2)	Contaminant Name (3)	lbs/hour	TPY (4	•)	Special Condition/Applicati Information	Special on Condition/Application Information	Special on Condition/Application Information
	Fresh Feed Cracking	NO _x	70.68	(13)	<u>5</u> 8	5	45, 5 4 <u>, 55</u>	
N-3	Furnace H-0300 Startup	СО	136.04	(13)		·		
	Fresh Feed Cracking	NOx	70.68	(13)			45 54 55	
N-4	Furnace H-0400 Startup	со	136.04	(13)		<u>55</u>	45, 54<u>, 55</u>	
N-5	Fresh Feed Cracking Furnace H-0500 Startup	NOx	70.68	(13)		<u>55</u>		
IN-5		со	136.04	(13)			45, 5 4 <u>, 55</u>	
NO	Fresh Feed Cracking Furnace H-0600 Startup	NOx	70.68	(13)		<u>55</u>		
N-6		СО	136.04	(13)			45, 5 4 <u>, 55</u>	
N 7	Fresh Feed Cracking H-	NO _x	70.68	(13)				
N-7	0700 Startup	со	136.04	(13)		<u>55</u>	45, 54<u>, 55</u>	
NO	Fresh Feed Cracking H-	NOx	70.68	(13)				
N-8	0800 Startup	со	136.04	(13)		<u>55</u>	45, 5 4 <u>, 55</u>	
NO	Fresh Feed Cracking H-	NOx	48.75	(13)		<i></i>		
N-9	0900 Startup	СО	34.13	(13)		<u>55</u>	45, <u>-</u> 54 <u>, 55</u>	
N 40	Fresh Feed Cracking H-	NOx	49.80	(13)				
N-16	1900 Startup	СО	69.72	(13)		<u>55</u>	45 , 5 4 <u>, 55</u>	

Permit Numbers	: 36644, PSDTX903M5 and	N007M1	Issuance Date: 08/10/2023				
Emission Point		Air	Emissio	n Rates	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
No. (1)	Source Name (2)	Contaminant Name (3)	lbs/hour	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
	DP Reactor Feed Heater	NO _x	15.02	(13)			
N-12	Startup	СО	14.52	(13)	<u>55</u>	45, 54<u>, 55</u>	
	DP Reactor Regeneration	NOx	3.45	(13)			
N-13	Heater	СО	4.74	(13)	<u>55</u>	45, 5 4 <u>, 55</u>	
	Auxiliary Boiler Startup	NOx	27.12	(13)	55	45 , 5 4 <u>, 55</u>	
N-14		СО	31.19	(13)			
	GTG HRSG Unit 1 Startup	NOx	123.53	(13)	<u>55</u>	45, <u>55, 5</u> 4	
N-20A		СО	716.12	(13)			
		NO _x	123.53	(13)	<u>55</u>	45 , 5 4 <u>, 55</u>	
N-20B	GTG HRSG Unit 2 Startup	СО	716.12	(13)			
		NOx	17.02	(13)			
N-24A	Boiler B-7280 Startup	СО	29.78	(13)	<u>55</u>	45, 5 4 <u>, 55</u>	
		NOx	17.02	(13)			
N-24B	Boiler B-7290 Startup	СО	29.78	(13)	<u>55</u>	45, 5 4 <u>, 55</u>	
	Cogen Starting Engine Unit	VOC	0.01<u>0.50</u>	0.01<u>0.02</u>	59 , 63	59 , 63	
GTGENG-1	#20A (14)	NO _x	16.48	0.79			

Permit Numbers	s: 36644, PSDTX903M5 and	N007M1	Issuance Date: 08/10/2023				
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 Condition/Application Information	Special Condition/Application Information
		СО	5.17	0.25			
		SO ₂	0.01	0.01			
		PM	0.71	0.03			
		PM10	0.71	0.03			
		PM _{2.5}	0.71	0.03			
		VOC	0.01<u>0.50</u>	0.01<u>0.02</u>			
		NOx	16.48	0.79	•	<u>59</u> 6 3	
		СО	5.17	0.25			
GTGENG-2	Cogen Starting Engine Unit #20B (14)	SO ₂	0.01	0.01	<u>59 63</u>		
	#20D (14)	PM	0.71	0.03			
		PM ₁₀	0.71	0.03			
		PM _{2.5}	0.71	0.03			

(1) (2) (3)

Emission point identification - either specific equipment designation or EPN from plot plan. Specific point source name. For fugitive sources, use area name or fugitive source name. VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1 CO - carbon monoxide

NOx - total oxides of nitrogen SO2 - sulfur dioxide

SO3 - sulfur trioxide

PM - total particulate matter (PM), suspended in the atmosphere, including PM10 and PM2.5, as represented

PM10 - total PM equal to or less than 10 microns in diameter, including PM2.5, as represented

PM2.5 - PM equal to or less than 2.5 microns in diameter

H2S - hydrogen sulfide

H2SO4 - sulfuric acid

NH3 - ammonia

- (4) Compliance with annual emission limits (tons per year) is based on a 12-month rolling period.
- (5) The VOC emission rate is for total VOC, including benzene.
- (6) Emissions from the fire pump diesel engines are based on 156 hours per year operation. Non-emergency fire pump operations shall only occur between the hours of 8:00 a.m. and 5:00 p.m. (one engine at any one time.)
- (7) These emissions are permitted under PSD or Nonattainment review in addition to State.
- (8) Reserved.
- (9) Mercury shall be calculated and expressed as elemental mercury in any form or phase and shall include the mercury contained in any compound.
- (10) Emissions from startups and spikes in the short-term rate are authorized at this rate for up to 150 total hours in any 12-month period during which emissions from one or more furnaces (EPNs N-1 through N-8, N-9, and N-16) exceed the routine lbs/hr emission limit. Annual emissions are included in the rates of normal operations.
- (11) Emissions from startups and spikes in the short-term rate are authorized at this rate for up to 876 total hours in any 12-month period. Annual emissions are included in the rates of normal operations.
- (12) Emission rate is an estimate and compliance is demonstrated by meeting the requirements of the applicable special conditions and permit application representations.
- (13) Annual emission rates are included in each EPN's respective routine emission rates.
- (14) Each engine is authorized to operate for up to 96 total hours in any 12-month period.
- (15) Annual emissions are included in the Flare Systems' annual Emission Limits.
- (16) Annual emissions are included in the Caustic Tank Cap Annual Emission Limits.
- (17) Emissions from startups in the short-term rate are authorized at this rate for up to 144 hours per 12-month rolling period.

Permit Number: GHGPSDTX3						Issuance Date: 08/24/2012				
Emission	Emission		Air Contaminant	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements		
Unit ID	Point No.	Source Name	Name	TPY ⁽²⁾	TPY CO_{2e} (2,3)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information		
			CO ₂	255,735						
H-1000	N-16	Ethylene Cracking	CH₄	14.2	256,914	III.A.3-4, III.B.1.a,b,g, i,j, III.C.1-4, IV.A.1, 6, V.A-B	III.A.3-4, III.B.1.c-g, j, IV.A.1.a-f, IV.A.3-9	I.D.1-2, IV.A.6, V.C		
		Furnace	N ₂ O	2.8						
		DUIGI3	CO ₂	420,095	421,399	III.A.3-4, III.B.2.g-h, III.C.1-4, IV.A.1, 6, V.A-B				
B-7280 and B-7290	N-24A & N-24B		CH ₄	22.0			III.A.3-4, III.B.2.a,b, IV.A.1.a-e, IV.A.3-9	I.D.1-2, IV.A.6, V.C		
			N ₂ O	4.4						
		Auxiliary Gas Turbine Duct Burner	CO ₂	117,786	118,329	III.A.3-4, III.B.3.f,g, III.C.1-4, IV.A-B, IV.A.1, 6, V.A-B	III.A.3-4, III.B.3.a, IV.A.1.a-e, IV.A.3-9	I.D.1-2, IV.A.6, V.C		
DB-1 (or GTG1-DB)	N-20A		CH₄	6.5						
			N ₂ O	1.3						
		Auxiliary Gas	CO ₂	117,786			III.A.3-4, III.B.3.a, IV.A.1.a-e, IV.A.3-9	I.D.1-2, IV.A.6, V.C		
DB-2 (or GTG2-DB)	N-20B	Turbine Duct Burner	CH ₄	6.5	118,329	III.A.3-4, III.B.3.f,g, III.C.1-4, IV.A-B, IV.A.1, 6, V.A-B				
			N ₂ O	1.3	1	ТV.А. I, 0, V.А-В				
D-1801	N-18	Decoking Drum (10 th Furnace Operations Only)	CO ₂	571	571	III.B.1.f, IV.A.1	IV.A.1.a,f, IV.A.3-9	I.D.1-2, IV.A.6		

Permit Numb	per: GHGPSD	ГХЗ			Issuance Date: 08/24/2012				
Emission Unit ID	Emission Point No.	Source Name	Air Contaminant	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements	
			Name	TPY ⁽²⁾	TPY CO_{2e} (2,3)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information	
P-FUG	F-1	Fugitives (10 th Furnace Project Only)	CH4	N/A	N/A	III.B.4.a, IV.A.1,	IV.A.1.a, e, IV.A.2, IV.A.3-6, 9	IV.A.6	
HFC-FUG	F-5	HFC-Containing Equipment (10 th Furnace Project Only)	HFCs	N/A	N/A	N/A	III.B.5.b, IV.A.1.a, IV.A.3-6, 9	IV.A.6	

Compliance with the annual emission limits (tons per year) is based on a 365-day total, rolled daily. The TPY emission limits specified in this table are not to be exceeded for this facility and include emissions only from the facility during all operations and include (1) (2) MSS activities.

Global Warming Potentials (GWP): $CH_4 = 21$, $N_20 = 310$

(3) (4) The steam package boilers have a combined annual refinery fuel gas (RFG) firing limit equivalent to one boiler firing RFG at capacity for 8,760 hrs. per year.

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

S. P. POP CRICKS

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: 100216977						
CN: 604166967						
Account No.: JE-0843-F						
Permit No.: O-2551						
Project No.: 36831						
Area Name: Ethylene/Propylene Cracker and Coge	neration					
Company Name: BASF TOTAL Petrochemicals Ll	LC					
II. Certification Type (Please mark appropria	ate box)					
Responsible Official Representative	Duly Authorized Representative					
III. Submittal Type (Please mark appropriate	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						
Other:						

Page ____ of ____

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

All initial issuance, revision, and renewal permit application submittals requiring certification must be accompanied by this form. Updates to acid rain or CSAPR (other than public notice verification materials) must be certified prior to authorization of public notice for the draft permit.

IV. Certificat	ion of Truth				
This certification	does not extend to infe	ormation which is desi	gnated by TCEQ as in	formation for reference only.	
I, John Lycan		certify that I am	the RO		
	Certifier Name printed o			(RO or DAR)	
the time period or Note: Enter Either	on the specific date(s) b	below, are true, accurate <i>ific Date(s) for each cer</i>	, and complete:	and information dated during nust be completed. The	
Time Period: From		to03/19/2025			
		(Start Date)		(End Date)	
Specific Dates:					
	(Date 1)	(Date 2)	(Date 3)	(Date 4)	
\cap	(Date 5)		(Date 6)		
Signature:	Signature Date: <u>3/19/2025</u>				
Title: <u>Vice Presi</u> k	dent Port Arthur Site				

Federal Operating Permit Program Site Information Summary Form OP-1 (Page 3) Texas Commission on Environmental Quality (Updated 03/19/2025)

VII. Technical Contact Identifying Information (Complete if different from RO.)					
Technical Contact Name Prefix: (Mr. Mrs. Ms. Dr.)					
Technical Contact Full Name: Jacob Benfield					
Technical Contact Title: Sr. Environmental & Sustainability Specialist					
Employer Name: BASF Corporation					
Mailing Address: P.O. Box 2506					
City: Port Arthur					
State: TX					
ZIP Code: 77643					
Territory:					
Country: USA					
Foreign Postal Code:					
Internal Mail Code:					
Telephone No.: 915-433-8774					
Fax No.:					
Email: jacob.benfield@basf.com					
VIII. Reference Only Requirements (For reference only.)					
A. State Senator: Senator Robert Nichols (District 3)					
B. State Representative: Rep. Manuel Christian (District 22)					
C. Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)?	XES 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 5) Texas Commission on Environmental Quality (Updated 03/19/2025)

X.	Application Area Information (continued)						
G.	Latitude (nearest second): 29° 57' 10"						
Н.	Longitude (nearest second): 93° 53' 6"						
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?						
J.	Indicate the estimated number of emission units in the application area: 97 from NSR authorization references						
K.	Are there any emission units in the application area subject to the Acid Rain Program?						
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: Port Arthur Public Library						
B.	Physical Address: 4615 9th Avenue						
City:	Port Arthur						
ZIP (Code: 77642						
C.	Contact Person (Someone who will answer questions from the public during the public notice period):						
Cont	act Name Prefix: (Mr. Mrs. Ms. Dr.):						
Cont	act Person Full Name: Jacob Benfield						
Cont	Contact Mailing Address: P.O. Box 2506						
City:	Port Arthur						
State	State: TX						
ZIP (ZIP Code: 77643						
Terri	Territory:						
Country: USA							
Forei	Foreign Postal Code:						
Intern	nal Mail Code:						
Telep	phone No.: 915-433-8774						

Date:	11/05/2024
Permit No:	0-2551
Regulated Entity No.:	100216977
Company Name :	BASF TOTALEnergies Petrochemicals LLC

Revision	Revision	Unit/Group Process				
No.	Code	New Unit	ID No.	Applicable Form	NSR Authorization	Description of Changes and Provisional Terms and Conditions
1	MS-C	No	N/A	OP-REQ1	N/A	Provide updated Form OP-REQ1.
2	MS-C	No	See OP-PBRSUP	See OP-PBRSUP	See OP-PBRSUP	Submittal of OP-PBRSUP
3	MS-C	No	N/A		36644	Incorporate the Permit 36644 alteration dated June 14, 2023, into the Title V operation permit.
4	ADMIN-G	No	N/A		36644	Incorporate the Alternative Method of Control (AMOC) Plan, AMOC No. 220 dated April 28, 2023, into the Title V operation permit.
5	MS-C	No	N-15	OP-2 UA-15	36644, PSDTX903M5, N007M1	Add new scenario for existing process vents N-15 and N-15A and add 30 TAC Chapter 115 applicability for sending a process vent stream to a flare that requires a recently approved AMOC.
6	MS-C	No	N-15A	OP-2 UA-15	36644, PSDTX903M5, N007M1	Add new scenario for existing process vents N-15 and N-15A and add 30 TAC Chapter 115 applicability for sending a process vent stream to a flare that requires a recently approved AMOC.
7	MS-C	No	HONWWTP	OP-2	36644, PSDTX903M5, N007M1	Omit Group 1 MACT G wastewater requirements. The source is subject to site-wide only MACT G requirements. (Source is Group 2.)
8	MS-C	No	T-8201	OP-2	36644, PSDTX903M5, N007M1	Omit Group 1 MACT G wastewater requirements. The source is subject to site-wide only MACT G requirements. (Source is Group 2.)
9	SIG-B	No	T-5702	OP-2	36644. PSDTX903M5. N007M1	Omit NSPS NNN requirements. The source is subject to 40 CFR Part 63, Subpart G and 40 CFR Part 63, Subpart YY.
_				OP-REQ2		Add negative applicability to 40 CFR Part 60, Subpart NNN.
10	SIG-B	No	R-2501X	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Omit NSPS RRR requirements. The reactor does not produce any products listed in NSPS RRR and is not considered a process vent. The source is a part of Unit ID HONWWTP which is a wastewater treatment system that is subject to 40 CFR Part 63, Subpart YY and 40 CFR Part 63, Subpart G.
						Add negative applicability for 40 CFR Part 60, Subpart RRR.
11	ADMIN-A	No	TK-9601R	OP-2	36644, PSDTX903M5, N007M1	Update Unit ID to coincide with facility records. Replace Unit ID TK-9601 with TK-9601R.
12	ADMIN-A	No	D-3730X	OP-2	36644, PSDTX903M5, N007M1	Update Unit ID to coincide with facility records. Replace Unit ID D-3780X with D-3730X.
13	MS-C	No	B-7240	OP-2 OP-UA6	36644, PSDTX903M5, N007M1	Add 40 CFR 63 Subpart DDDDD detailed rules to B-7240 for compliance with 63 Subpart DDDDD.
14	MS-C	No	B-7280	OP-2 OP-UA6	36644, GHGPSDTX3, PSDTX903M5, N007M1	Add 40 CFR 63 Subpart DDDDD detailed rules to B-7280 for compliance with 63 Subpart DDDDD.
15	MS-C	No	B-7290	OP-2 OP-UA6	36644, GHGPSDTX3, PSDTX903M5, N007M1	Add 40 CFR 63 Subpart DDDDD detailed rules to B-7290 for compliance with 63 Subpart DDDDD.

Date:	11/05/2024
Permit No:	0-2551
Regulated Entity No.:	100216977
Company Name :	BASF TOTALEnergies Petrochemicals LLC

Revision	Revision		Unit/Group Proc	ess		
No.	Code	New Unit	ID No.	Applicable Form	NSR Authorization	Description of Changes and Provisional Terms and Conditions
16	MS-C	No	N-12	OP-2 OP-UA6 OP-UA5	36644, PSDTX903M5, N007M1	Add 40 CFR 63 Subpart DDDDD detailed rules to N-12 for compliance with 63 Subpart DDDDD.
17	MS-C	No	N-13	OP-2 OP-UA6 OP-UA5	36644, PSDTX903M5, N007M1	Add 40 CFR 63 Subpart DDDDD detailed rules to N-13 for compliance with 63 Subpart DDDDD.
18	SIG-B	No	TK-2501B	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Add negative 40 CFR Part 60, Subpart Kb applicability.
19	SIG-B	No	TK-2501	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Add negative 40 CFR Part 60, Subpart Kb applicability.
20	MS-C	No	X-8502	OP-2	36644, PSDTX903M5, N007M1	Remove scenarios associated with SOP Index No. 60A-1 and 60A-2
21	MS-C	Yes	T270596	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORGSV. Unit ID T270596 has the same regulatory applicability as GRPINORGSV.
22	MS-C	Yes	TK-7401	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORGSV. Unit ID TK-7401 has the same regulatory applicability as GRPINORGSV.
23	MS-C	Yes	TK-7601	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORGSV. Unit ID TK-7601 has the same regulatory applicability as GRPINORGSV.
24	MS-C	Yes	TK-2493	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORGSV. Unit ID TK-2493 has the same regulatory applicability as GRPINORGSV.
25	MS-C	Yes	TK-2491	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORGSV. Unit ID TK-2491 has the same regulatory applicability as GRPINORGSV.
26	MS-C	Yes	TK-9604	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORGSV. Unit ID TK-9604 has the same regulatory applicability as GRPINORGSV.
27	MS-C	Yes	TK-9801	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORGSV. Unit ID TK-9801 has the same regulatory applicability as GRPINORGSV.
28	MS-C	Yes	TK-5273	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPSV1K. Unit ID TK-5273 has the same regulatory applicability as GRPSV1K.
29	MS-C	Yes	TK-5273X	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPSV1K. Unit ID TK-5273X has the same regulatory applicability as GRPSV1K.
30	MS-C	Yes	TK-5510	OP-2 OP-SUMR	36644, PSDTX903M5, N007M1	Add storage vessel to GRPSV1K. Unit ID TK-5510 has the same regulatory applicability as GRPSV1K.
31	MS-C	Yes	T233674	OP-2 OP-SUMR	106.371/09/04/2000	Add storage vessel to GRPSV1K. Unit ID T233674 has the same regulatory applicability as GRPSV1K.
32	MS-C	Yes	T233676	OP-2 OP-SUMR	106.371/09/04/2000	Add storage vessel to GRPSV1K. Unit ID T233676 has the same regulatory applicability as GRPSV1K.
33	MS-C	Yes	T113596	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPSV1K. Unit ID T131632 has the same regulatory applicability as GRPSV1K.
34	MS-C	Yes	T131632	OP-2 OP-SUMR	106.371/09/04/2000	Add storage vessel to GRPSV1K. Unit ID T131632 has the same regulatory applicability as GRPSV1K.

Date:	11/05/2024
Permit No:	0-2551
Regulated Entity No.:	100216977
Company Name :	BASF TOTALEnergies Petrochemicals LLC

Revision	Revision		Unit/Group Proc	ess		
No.	Code	New Unit	ID No.	Applicable Form	NSR Authorization	Description of Changes and Provisional Terms and Conditions
35	MS-C	Yes	T280047	OP-2 OP-SUMR	106.371/09/04/2000	Add storage vessel to GRPSV1K. Unit ID T280047 has the same regulatory applicability as GRPSV1K.
36	SIG-B	Yes	тк-1501	OP-2 OP-SUMR OP-UA3 OP-REQ2	106.472/09/04/2000	Add TK-1501 to Title V permit as submitted via Op-Notify on 07/08/2015 (Project No. 23146). Add negative 40 CFR Part 60, Subpart Kb applicability.
37	SIG-B	Yes	ТК-2210	OP-2 OP-SUMR OP-UA3 OP-REQ2	36644, PSDTX903M5, N007M1	Add storage vessel. Provide unit attribute information on Form OP-UA3. Add negative 40 CFR Part 60, Subpart Kb applicability.
38	SIG-B	Yes	тк-2620	OP-2 OP-SUMR OP-UA3 OP-REQ2	106.472/09/04/2000	Add storage vessel. Provide unit attribute information on Form OP-UA3. Add negative 40 CFR Part 60, Subpart Kb applicability.
39	SIG-B	Yes	тк-4020	OP-2 OP-SUMR OP-UA3 OP-REQ2	106.472/09/04/2000	Add storage vessel. Provide unit attribute information on Form OP-UA3. Add negative 40 CFR Part 60, Subpart Kb applicability.
40	SIG-B	Yes	T241176	OP-2 OP-SUMR OP-UA3 OP-REQ2	106.472/09/04/2000	Add storage vessel. Provide unit attribute information on Form OP-UA3. Add negative 40 CFR Part 60, Subpart Kb applicability.
41	ADMIN-A	No	GRPSV1K	OP-2 OP-REQ2		Update negative NSPS Kb language to current language. Negative applicability for MACT YY and Chapter 115 remain the same.
42	ADMIN-A	No	D-8001R	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Update negative NSPS Kb language to current language.
43	ADMIN-A	No	DSL-TK	OP-2 OP-REQ2	106.473/09/04/2000	Update negative NSPS Kb language to current language.
44	ADMIN-A	No	TK-2210X	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Update negative NSPS Kb language to current language.
45	ADMIN-A	No	TK-3110X	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Update negative NSPS Kb language to current language.
46	ADMIN-A	No	TK-3710X	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Update negative NSPS Kb language to current language.

Date:	11/05/2024
Permit No:	0-2551
Regulated Entity No.:	100216977
Company Name :	BASF TOTALEnergies Petrochemicals LLC

Revision	Revision	Unit/Group Process				
No.	Code	New Unit	ID No.	Applicable Form	NSR Authorization	Description of Changes and Provisional Terms and Conditions
47	ADMIN-A	No	ТК-7403Х	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Update negative NSPS Kb language to current language.
48	ADMIN-A	No	ТК-9603Х	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Update negative NSPS Kb language to current language.
49	ADMIN-A SIG-B	No	X-8501	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Update negative NSPS A language.
50	ADMIN A MS-A	No	F-1	OP-2 OP-SUMR	36644, PSDTX903M5, N007M1 160345 (106.261) 160348 (106.261/106.262) 167920 (106.261/106.262) 169666 (106.261) 172347 (106.261)	Add PBR Registration numbers for Unit ID
51	ADMIN-A MS-A	No	F-4	OP-2 OP-SUMR	36644, PSDTX903M5, N007M1 160348 (106.261/106.262)	Add PBR Registration numbers for Unit ID
52	ADMIN-A MS-A	No	N-15	OP-2 OP-SUMR	36644, PSDTX903M5, N007M1 160348 (106.261/106.262) 170435 (106.261)	Add PBR Registration numbers for Unit ID
53	ADMIN-A MS-A	No	N-15A	OP-2 OP-SUMR	36644, PSDTX903M5, N007M1 160348 (106.261/106.262) 170435 (106.261)	Add PBR Registration numbers for Unit ID
54	ADMIN-A MS-C	No	F-1	OP-2 OP-SUMR OP-REQ2	36644, PSDTX903M5, N007M1	Remove 30 TAC Chapter 115, Fugitives Pet Ref B Counties Permit Shield.
55	ADMIN A MS-C	No	F-4	OP-2 OP-SUMR OP-REQ2	36644, PSDTX903M5, N007M1	Remove 30 TAC Chapter 115, Fugitives Pet Ref B Counties Permit Shield.
56						
57						
58						
59						
60						

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

1	Date	Permit No.	Regulated Entity No.
	3/19/2025	O-2551	100216977

	Revision	Unit/C	Group/Process	Potentially Applicable	Negative	Negative Applicability/Superseded Requirement
Unit AI	No.	ID No.	Applicable Form	Regulatory Name	Applicability/Superseded Requirement Citation	Reason
А	9	T-5702	OP-2 OP-REQ2	NSPS NNN	§63.110(d)(4)	Group 1 process vent subject to 40 CFR Part 63, Subpart G and 40 CFR Part 60, Subpart NNN, must comply with 40 CFR, Part 63, Subpart G.
А	10	R-2501X	OP-2 OP-REQ2	NSPS RRR	60.700(a)	The source does not produce any products listed in NSPS RRR. In addition, this source is not a process vent, but rather a wastewater treatment vent subject to 40 CFR 63, Part YY as it is part of Unit ID HONWWTP.
А	18	TK-2501B	OP-2 OP-REQ2	NSPS Kb	§60.110b(b)	This source has a capacity greater than 39,890 gallons (151 m^3) and stores a liquid with a maximum true vapor pressure less than 0.5 psia (3.5 kPa).
A	19	TK-2501	OP-2 OP-REQ2	NSPS Kb	§60.110b(b)	This source has a capacity greater than 39,890 gallons (151 m^3) and stores a liquid with a maximum true vapor pressure less than 0.5 psia (3.5 kPa).
A	36	TK-1501	OP-2 OP-SUMR OP-UA3 OP-REQ2	NSPS Kb	§60.110b(a)	This source has a capacity of less than 19,800 gallons (75 m ³).
А	37	TK-2210	OP-2 OP-SUMR OP-UA3 OP-REQ2	NSPS Kb	§60.110b(a)	This source has a capacity of less than 19,800 gallons (75 m^3).

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

Date	Permit No.	Regulated Entity No.
3/19/2025	O-2551	100216977

	Revision No.	Unit/Group/Process		Potentially Applicable	Negative	Negative Applicability/Superseded Requirement
Unit AI		ID No.	Applicable Form	Regulatory Name	Applicability/Superseded Requirement Citation	Reason
А	38	TK-2620	OP-2 OP-SUMR OP-UA3 OP-REQ2	NSPS Kb	§60.110b(a)	This source has a capacity of less than 19,800 gallons (75 m^3).
A	39	TK-4020	OP-2 OP-SUMR OP-UA3 OP-REQ2	NSPS Kb	§60.110b(a)	This source has a capacity of less than 19,800 gallons (75 m^3).
A	40	T241176	OP-2 OP-SUMR OP-UA3 OP-REQ2	NSPS Kb	§60.110b(a)	This source has a capacity of less than 19,800 gallons (75 m^3).
D	41	GRPSV1K	OP-2 OP-REQ2	NSPS Kb	§60.110b(a)	Capacity of storage vessel is less than 10,600 gallons.
А	41	GRPSV1K	OP-2 OP-REQ2	NSPS Kb	§60.110b(a)	The storage vessels have a capacity of less than 19,800 gallons (75 m3).
D	42	D-8001R	OP-2 OP-REQ2	NSPS Kb	§60.110b(a)	Capacity of storage vessel is less than 10,600 gallons.
А	42	D-8001R	OP-2 OP-REQ2	NSPS Kb	§60.110b(a)	The storage vessel has a capacity of less than 19,800 gallons (75 m3).
D	43	DSL-TK	OP-2 OP-REQ2	NSPS Kb	§60.110b(a)	Capacity of storage vessel is less than 10,600 gallons.
А	43	DSL-TK	OP-2 OP-REQ2	NSPS Kb	§60.110b(a)	The storage vessel has a capacity of less than 19,800 gallons (75 m3).
D	44	TK-2210X	OP-2 OP-REQ2	NSPS Kb	§60.110b(a)	Capacity of storage vessel is less than 10,600 gallons.
A	44	TK-2210X	OP-2 OP-REQ2	NSPS Kb	§60.110b(a)	The storage vessel has a capacity of less than 19,800 gallons (75 m3).

TCEQ-10017 (APD-ID156v2.0, Revised 07/22) Form OP-REQ2 - Negative Applicable/Superseded Requirement Determinations

This form for use by facilities subject to air quality permit requirements and may be revised periodically (Title V Release 10/07)

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

Date	Permit No.	Regulated Entity No.
3/19/2025	O-2551	100216977

	Revision	Unit/Group/Process		Potentially Applicable	Negative	Negative Applicability/Superseded Requirement Reason	
Unit AI	No.	ID No. Applicable Form		Regulatory Name	Applicability/Superseded Requirement Citation		
D	45	ТК-3110Х	OP-2 OP-REQ2	NSPS Kb	§60.110b(a)	Capacity of storage vessel is less than 10,600 gallons.	
А	45	ТК-3110Х	OP-2 OP-REQ2	NSPS Kb	§60.110b(a)	The storage vessel has a capacity of less than 19,800 gallons (75 m3).	
D	46	ТК-3710Х	OP-2 OP-REQ2	NSPS Kb	§60.110b(a)	Capacity of storage vessel is less than 10,600 gallons.	
А	46	TK-3710X	OP-2 OP-REQ2	NSPS Kb	§60.110b(a)	The storage vessel has a capacity of less than 19,800 gallons (75 m3).	
D	47	ТК-7403Х	OP-2 OP-REQ2	NSPS Kb	§60.110b(a)	Capacity of storage vessel is less than 10,600 gallons.	
A	47	TK-7403X	OP-2 OP-REQ2	NSPS Kb	§60.110b(a)	The storage vessel has a capacity of less than 19,800 gallons (75 m3).	
D	48	TK-9603X	OP-2 OP-REQ2	NSPS Kb	§60.110b(a)	Capacity of storage vessel is less than 10,600 gallons.	
А	48	TK-9603X	OP-2 OP-REQ2	NSPS Kb	§60.110b(a)	The storage vessel has a capacity of less than 19,800 gallons (75 m3).	
D	49	X-8501	OP-2 OP-REQ2	NSPS A	§60.18	Removed NSPS A permit shield: Flare does not control a source subject another subpart of 40 CFR Part 60.	
А	49	X-8501	OP-2 OP-REQ2	NSPS A	\$63.1100(g)(7) §63.1100(g)(7)(i)	MACT YY flare requirements are applicable and therefore in accordance with 63.1100(g)(7)(i), MACT YY flare requirements supersede NSPS A requirements.	
D	54	F-1	OP-2 OP-SUMR OP-REQ2	Chapter 115	30 TAC Chapter 115, Subchapter D, Division 2 (Fugitives Pet Ref B Counties)	Remove 30 TAC Chapter 115, Fugitives Pet Ref B Counties Permit Shield: The process unit is not located in Gregg, Nueces, or Victoria County.	
D EQ-10017 (APD	55 ID156v2.0, Revised 07/	F-4 22) Form OP-REQ2 - Negative Appl	OP-2 OP-SUMR icable/Superseded ନିର୍ଦ୍ଦିଧାନିନିଜିନି Determinations	Chapter 115	30 TAC Chapter 115, Subchapter D, Division 2 (Fugitives Pet Ref B Counties)	Remove 30 TAC Chapter 115, Fugitives Pet Ref B Counties Permit Shield: The process unit is not located in Gregg, Nueces, or Victoria County.	

This form for use by facilities subject to air quality permit requirements and

may be revised periodically (Title V Release 10/07)

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.		
3/19/2025	O-2551	100216977		

Unit /	Unit / Process		Unit/P	rocess		Preconstruction Authoriz	zations
Process AI	Revision No.	ID No.	Applicable Form	Name/ Description	САМ	30 TAC Chapter 116/ 30 TAC Chapter 106	Title I
А	21	T270596	OP-2 OP-SUMR	Optisperse HP7414 Tank		106.472/09/04/2000	
А	22	TK-7401	OP-2 OP-SUMR	Potable Water Tank		106.472/09/04/2000	
А	23	TK-7601	OP-2 OP-SUMR	Potable Water Head Tank		106.472/09/04/2000	
А	24	TK-2493	OP-2 OP-SUMR	20Y15 Antifoulant Tank		106.472/09/04/2000	
А	25	TK-2491	OP-2 OP-SUMR	20Y15 Antifoulant Tank		106.472/09/04/2000	
А	26	TK-9604	OP-2 OP-SUMR	Phosphate Injection Tank		106.472/09/04/2000	
А	27	TK-9801	OP-2 OP-SUMR	C4 Clarified Water Tank		106.472/09/04/2000	
А	28	TK-5273	OP-2 OP-SUMR	Antifoam Agent Porta-Feed		106.472/09/04/2000	
А	29	TK-5273X	OP-2 OP-SUMR	Antifoam Agent Porta-Feed		106.472/09/04/2000	
A	30	TK-5510	OP-2 OP-SUMR	Lube Oil Reservoir		36644	PSDTX903M5, N007M1
А	31	T233674	OP-2 OP-SUMR	20Y114 Antifoulant Tank		106.371/09/04/2000	

TCEQ-10344 (APDG 5767v7, Revised 05/20) OP-SUMR This form is for use by facilities subject to air quality permit requirements and may be revised periodically.

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.		
3/19/2025	O-2551	100216977		

Unit /	Unit / Process		Unit/P	rocess		Preconstruction Authoriz	ations
Process AI	Revision No.	ID No.	Applicable Form	Name/ Description	САМ	30 TAC Chapter 116/ 30 TAC Chapter 106	Title I
A	32	T233676	OP-2 OP-SUMR	20Y14 Tank		106.371/09/04/2000	
A	33	T113596	OP-2 OP-SUMR	Petroflo 4H3 Tank		106.472/09/04/2000	
А	34	T131632	OP-2 OP-SUMR	Spectrus NX1100 Tank		106.371/09/04/2000	
А	35	T280047	OP-2 OP-SUMR	CT Biodispersant Tank		106.371/09/04/2000	
A	36	TK-1501	OP-2 OP-SUMR OP-UA3 OP-REQ2	Chemical Injection Tank		106.472/09/04/2000	
А	37	TK-2210	OP-2 OP-SUMR OP-UA3 OP-REQ2	Lube Oil Reservoir		36644	PSDTX903M5, N007M1

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.		
3/19/2025	O-2551	100216977		

Unit /	Unit / Process		Unit/P	Preconstruction Authorizations			
Process AI	Revision No.	ID No.	Applicable Form	Name/ Description	САМ	30 TAC Chapter 116/ 30 TAC Chapter 106	Title I
А	38	TK-2620	OP-2 OP-SUMR OP-UA3 OP-REQ2	20Y104 Poly Inhibitor Tank		106.472/09/04/2000	
А	39	TK-4020	OP-2 OP-SUMR OP-UA3 OP-REQ2	20Y104 Poly Inhibitor Tank		106.472/09/04/2000	
A	40	T241176	OP-2 OP-SUMR OP-UA3 OP-REQ2	20Y120 Poly Inhibitor Tank, 20%		106.472/09/04/2000	
A	50	F-1	OP-2 OP-SUMR	Fugitives		36644, PSDTX903M5, N007M1 160345 (106.261) 160348 (106.261/106.262) 167920 (106.261/106.262) 169666 (106.261) 172347 (106.261)	
А	51	F-4	OP-2 OP-SUMR	Benzene Extraction Equipment Leaks		36644, PSDTX903M5, N007M1 160348 (106.261/106.262)	
А	52	N-15	OP-2 OP-SUMR	Ground Flare		36644, PSDTX903M5, N007M1 160348 (106.261/106.262) 170435 (106.261)	
А	53	N-15A	OP-2 OP-SUMR	Enclosed Flare Vent Header		36644, PSDTX903M5, N007M1 160348 (106.261/106.262) 170435 (106.261)	

Fugitive Emission Unit Attributes Form OP-UA12 (Page 11) Federal Operating Permit Program Table 2a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115) Subchapter D: Fugitive Emission Control in Petroleum Refining, Natural Gas/Gasoline Processing, and Petrochemical Processes in Ozone Nonattainment Areas Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
3/19/2025	0-2551	RN100216977

Unit ID No.	SOP/GOP Index No.	Title 30 TAC § 115.352 Applicable	< 250 Components at Site	Weight Percent VOC	Reciprocating Compressors or Positive Displacement Pumps
F-1	R5352-ALL				
F-4	R5352-ALL				

Fugitive Emission Unit Attributes Form OP-UA12 (Page 21) Federal Operating Permit Program Table 2k: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115) Subchapter D: Fugitive Emission Control in Petroleum Refining, Natural Gas/Gasoline Processing, and Petrochemical Processes in Ozone Nonattainment Areas Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
3/19/2025	0-2551	RN100216977

Unit ID No.	SOP Index No.	Components Utilizing Alternative Work Practice in § 115.358	Title 30 TAC § 115.358 Fugitive Unit Description
F-1	R5352-ALL	No	Equipment leaks in hot and cold section.
F-4	R5352-ALL	No	Equipment leaks in benzene/toluene extraction unit.

TCEQ-10045 (APD-ID 27v5.0, Revised 07/23) OP-UA12 This form is for use by facilities subject to air quality permit requirements and may be revised periodically. (Title V Release 07/23)

Fugitive Emission Unit Attributes Form OP-UA12 (Page 32) Federal Operating Permit Program Table 4a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60) Subpart VV: Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006

Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
3/19/2025	0-2551	RN100216977

Unit ID No.	SOP Index No.	Produces Chemicals	Affected Facility	Construction/ Modification Date	Compliance Option	Design Capacity	Produces Heavy Liquid Chemicals	Beverage Alcohol Production
F-1	60VV-ALL							
F-4	60VV-ALL							

Т

Fugitive Emission Unit Attributes

Form OP-UA12 (Page 41)

Federal Operating Permit Program

Table 4j: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

Subpart VV: Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which

Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006

Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
3/19/2025	0-2551	RN100216977

	1	Title 40 CFR Part 60,	Subpart VV Fugitive	Unit Components	(continued)	
			Closed Vent System	and Control Device		
Unit ID No.	SOP Index No.	Flare	EEL	EEL ID No.	Complying with 60.482-10	Control Device ID.
F-1	60VV-ALL	Yes	No		Yes	X-8501
F-4	60VV-ALL	Yes	No		Yes	X-8501

Fugitive Emission Unit Attributes Form OP-UA12 (Page 42) Federal Operating Permit Program Table 4k: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60) Subpart VV: Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006

Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
3/19/2025	0-2551	RN100216977

		Title 40 CFR Part 60,	Subpart VV Fugitive Unit	Components (continued)	
			Closed Vent System and	Control Devices	
Unit ID. No.	SOP Index No.	CVS(or Vapor Collection System)	EEL	EEL ID No.	Complying with 60.482-10
F-1	60VV-ALL	Yes	No		Yes
F-4	60VV-ALL	Yes	No		Yes

Fugitive Emission Unit Attributes Form OP-UA12 (Page 43) Federal Operating Permit Program Table 41: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60) Subpart VV: Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006 Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
3/19/2025	0-2551	RN100216977

		Title 40 CFR Part 60, Subpart VV Fugitive Unit Components (continued)
Unit ID No.	SOP Index No.	Title 40 CFR Part 60, Subpart VV Fugitive Unit Description
F-1	60VV-ALL	Equipment leaks in hot and cold section
F-4	60VV-ALL	Equipment leaks in benzene / toluene extraction unit.

From: Kyle Murray <Kyle.Murray@tceq.texas.gov>
Sent: Monday, March 10, 2025 2:10 PM
To: Tammy Villarreal <TVillarreal@clara-vista.com>
Cc: Jacob Benfield <jacob.benfield@basf.com>; BTPEnvironmental <BTPEnvironmental@basf.com>;
Theresa Hulvey <thulvey@clara-vista.com>
Subject: RE: [EXT] Working Draft Permit -- FOP 02551/Project 36831, BASF TOTALEnergies
Petrochemicals, LLC

Good afternoon all,

I apologize for the oversight, but there was one item I neglected to include in my previous email. Please take some additional time if needed and address the following item in your response. You may have until **Thursday, March 20**th.

• **OP-PBRSUP / OP-SUMR -** Table A of the OP-PBRSUP lists multiple registered PBRs. Four of the listed units (F-1, F-4, N-15, and N-15A) are also in the permit. However, the permit does not list the PBRs or the PBR registration numbers for these units. Please provide these units on the OP-SUMR with all preconstruction authorizations listed. In other words, please list the PBRs and registration numbers in addition to the other NSR permits for these units on an updated OP-SUMR.

Response: BTP is including a revised OP-2 and OP-SUMR forms with this submittal. Updates are presented via red line strikeout.

Thank you for your continued assistance with this project. Please reach out if you have any questions.

Sincerely,

Kyle J. Murray

Permit Reviewer OA/Air Permits Division/OP Section Texas Commission on Environmental Quality MC 163, P.O. Box 13087 Austin, TX 78711-3087 kyle.murray@tceq.texas.gov

Phone: (512) 239-1279 Fax: (512) 239-1400



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey From: Kyle Murray
Sent: Tuesday, March 4, 2025 9:00 AM
To: Tammy Villarreal <<u>TVillarreal@clara-vista.com</u>>
Cc: Jacob Benfield <<u>jacob.benfield@basf.com</u>>; BTPEnvironmental <<u>BTPEnvironmental@basf.com</u>>;
Theresa Hulvey <<u>thulvey@clara-vista.com</u>>
Subject: RE: [EXT] Working Draft Permit -- FOP O2551/Project 36831, BASF TOTALEnergies
Petrochemicals, LLC

Good morning all,

In a final review before public notice, my technical specialist identified some additional issues regarding your application. Please address the following items by **Friday, March 14**th.

 Major NSR Summary Table – Although the changes in the 08/10/2023 alteration (revision) of NSR 36644/PSDTX903M5/N007M1 did not impact the MAERT information or the Special Conditions numbers that need to be referenced in the Major NSR Summary Table, that is not the only action that occurred since the last Title V project. There was another NSR amendment issued 06/23/2022 in which there were changes to the allowable emissions for a few units in the MAERT (GTGENG-1, GTGENG-2, TK1703, and TK1704). Please update those spots on a copy of the table and confirm no other updates are needed.

Response: A marked-up version of the Major NSR Summary Table is included with this response. Updates are presented via redline/strikeout.

2. Form OP-1

- a. It was indicated in previous correspondence that Mr. Darren Lanthier was no longer with BASF and that Mr. Jacob Benfield would serve as the technical contact from the provided OP-1. An updated public notice contact is still needed. Please provide an updated Page 5, Section XI. (Public Notice), indicating the new public notice contact.
- b. In the last renewal, the applicant indicated they *were* subject to bilingual notice (with Spanish as the alternative language). The OP-1 in this project says you are not. Please confirm that this is accurate and update the OP-1 if bilingual notice is needed.

Response: Revised versions of OP-1, pages 3 and 5, are included with this response.

3. Form OP-UA12 – Unit IDs F-1 and F-4: These two units are missing some requirements for certain fugitive components under Chapter 115, Pet. Refinery and Petrochemicals (Subchapter D, Division 3). They may also be missing some requirements for certain fugitive components under NSPS VV. It appears the last time those UA tables were submitted was in the initial issuance project about 20 years ago. Since then, we have updated the form for these rules several times due to rule amendments/RRT updates, so now there is some missing data that we need to determine requirements for some components. Please fill out Tables 2a-2k and Tables 4a-4I of the UA-12 for these units.

Response: Updated UA12 tables for Unit IDs F-1 and F-4 are included with this response. For these tables, we determined that the following index numbers R5352-ALL and 60VV-ALL are appropriate for 30 TAC Chapter 115 and NSPS VV respectively as in accordance with OP-UA12 instructions, BTP chooses to "imply that all requirements other than closed vent system and control device requirements" in the regulation apply to the fugitive unit. Attributes for closed vent systems and control devices are addressed in each of the Chapter 115 and NSPS VV unit attribute forms.

4. Permit Shields

a. **NSPS A for Unit ID X-8501 -** This shield indicates that this flare is not being used to control any sources subject to a Part 60 subpart. However, for fugitive units F-1 and F-4, their existing unit attributes for NSPS VV indicate that a flare is used, and X-8501 is the flare ID listed. If that unit attribute data is accurate, then what the permit shield states is not true, and the shield will need to be removed from the permit. Please verify.

Response: We agree with your finding. However, we also determined that another negative applicability determination is appropriate to show that NSPS A does not apply. We confirmed that MACT YY flare requirements are applicable and therefore in accordance with 63.1100(g)(7)(i), MACT YY flare requirements supersede NSPS A requirements. For reference the rule language of 63.1100(g)(7)(i) is:

Overlap of this subpart YY with other regulations for flares for the ethylene production source category.

(i) Beginning no later than the compliance dates specified in § 63.1102(c), flares that are subject to 40 CFR 60.18 or § 63.11 and used as a control device for an emission point subject to the requirements in Table 7 to § 63.1103(e) are required to comply only with § 63.1103(e)(4). At any time before the compliance dates specified in § 63.1102(c), flares that are subject to 40 CFR 60.18 or § 63.11 and elect to comply with § 63.1103(e)(4) are required to comply only with § 63.1103(e)(4).

b. 30 TAC Chapter 115 Fugitives (Subchapter B, Division 2) for Unit IDs F-1 and F-4 – These two units have existing permit shields based on location (not being in affected county). There is no operational change that would make the units subject to the rule. Additionally, these units have requirements for the other division that does apply to your county (Subchapter B, Division 3) so that also removes any suggestion that Division 2 could apply. Because of this we are requesting to remove these shields. Please confirm if this is acceptable.

Response: Your findings are correct. *BTP is subject to 30 TAC Chapter 115, Subchapter D, Division 3, for Units IDs F-1 and F-4. BTP agrees with the removal of the permit shield associated with 30 TAC Chapter 115, Subchapter D, Division 2. Revised OP-2 and OP-REQ2 forms for fugitive ID's F-1 and F-4 are included with this submittal. Updates are presented via red line/strikeout.*

Please let me know if you have any questions about any of these items and thank you for your continued assistance!

Sincerely,

Kyle J. Murray

Permit Reviewer OA/Air Permits Division/OP Section Texas Commission on Environmental Quality MC 163, P.O. Box 13087 Austin, TX 78711-3087

kyle.murray@tceq.texas.gov

Phone: (512) 239-1279 Fax: (512) 239-1400



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

From: Sent: To: Cc: Subject:	Tammy Villarreal <tvillarreal@clara-vista.com> Friday, November 8, 2024 10:23 AM Kyle Murray Jacob Benfield; BTPEnvironmental; Theresa Hulvey; Tammy Villarreal RE: [EXT] Working Draft Permit FOP O2551/Project 36831, BASF TOTALEnergies Petrochemicals, LLC</tvillarreal@clara-vista.com>
Follow Up Flag:	Follow up
Flag Status:	Completed

Good morning Mr. Murray,

On behalf of BASF TotalEnergies Petrochemicals, LLC (BTP), BTP accepts and approves the draft permit language provided on 11/6/2024. Please let us know if you need anything else to continue the permit review process.

Regards, Tammy

Tammy Villarreal, P.E.

Clara Vista Environmental, LLC (281) 728-4093

From: Kyle Murray <<u>Kyle.Murray@tceq.texas.gov</u>> Sent: Wednesday, November 6, 2024 11:09 AM To: Tammy Villarreal <<u>TVillarreal@clara-vista.com</u>> Cc: Jacob Benfield <<u>jacob.benfield@basf.com</u>>; BTPEnvironmental <<u>BTPEnvironmental@basf.com</u>>; Theresa Hulvey <<u>thulvey@clara-vista.com</u>> Subject: RE: [EXT] Working Draft Permit -- FOP O2551/Project 36831, BASF TOTALEnergies Petrochemicals, LLC

Good morning Ms. Villarreal,

I have implemented the revisions addressed in your response and attached the revised WDP. Changes to the document are as follows:

- 1. Added conditions upon which the MPGF system is approved.
- 2. Added footnote for GHGPSDTX3 reflected in the New Source Review Authorization Reference Table, page 83.
- 3. Added PBRs 106.227/09/04/2000, 106.511/09/04/2000, and 106.532/09/04/2000 to the NSR Reference Table.
- 4. Updated authorizations for Unit ID TK-2501B.

Please review the revised WDP and submit to me any additional comments by **Tuesday**, **November 12th or sooner if possible.** If you have no further comments on the WDP, please indicate your approval so we can continue with the application process. Thank you!

Sincerely,

Kyle J. Murray

Permit Reviewer OA/Air Permits Division/OP Section Texas Commission on Environmental Quality MC 163, P.O. Box 13087 Austin, TX 78711-3087 kyle.murray@tceq.texas.gov

Phone: (512) 239-1279 Fax: (512) 239-1400

<

How are we doing? Fill out our online customer satisfaction survey at <u>www.tceq.texas.gov/customersurvey</u>

From:	Tammy Villarreal <tvillarreal@clara-vista.com></tvillarreal@clara-vista.com>
Sent:	Tuesday, November 5, 2024 5:24 PM
То:	Kyle Murray
Cc:	Jacob Benfield; BTPEnvironmental; Theresa Hulvey; Tammy Villarreal
Subject:	RE: [EXT] Working Draft Permit FOP O2551/Project 36831, BASF TOTALEnergies Petrochemicals, LLC
Attachments:	WDP-O2551 BTP Renewal, 36831 - Nov 2024 Responses.pdf

Hello Mr. Murray:

On behalf of BASF TotalEnergies Petrochemicals, LLC (BTP), please find the response to your email dated October 17, 2024. We appreciate the extension in time for this submittal. With this response, we are also including signed OP-CRO1 to certify this submittal. Please feel free to contact Mr. Jacob Benfield at BTP if additional information is required.

Best regards, Tammy **Tammy Villarreal, P.E.** Clara Vista Environmental, LLC (281) 728-4093



November 5, 2024

SUBMITTED VIA EMAIL

Mr. Kyle Murray Operating Permits Section, Air Permits Division, MC 163 Texas Commission on Environmental Quality (TCEQ) P.O. Box 13087 Austin, TX 78711-3087

Subject: Title V Permit O2551 Renewal/Revision - Updates to Application TCEQ Project No. 36831 BASF TOTALEnergies Petrochemicals LLC NAFTA Regional Olefins Complex Port Arthur, Jefferson County RN100216977, CN604166967

Dear Mr. Murray:

BASF TOTALEnergies Petrochemicals LLC (BTP) is submitting responses to the questions/comments associated with the Working Draft Permit (WDP) received via email on October 17, 2024. The WDP is associated with the renewal/revision of Federal Operating Permit O2551, which authorizes the operation of the BTP NAFTA Regional Olefins Complex located in Port Arthur, Jefferson County, Texas.

If there are any questions related to this submittal, please contact Mr. Jacob Benfield, P.E. at (915) 433-8774 or via e-mail at jacob.benfield@basf.com.

Sincerely, John Lycan

Vice President, Port Arthur Site BASF TOTALEnergies Petrochemicals, LLC

CC: Sarah Kirksey, TCEQ Region 10, Air Section Manager R6AirPermitsTX@epa.gov

Enclosures



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.

			Contraction of the second s					
I. IDENTIFYING INFORMAT	TION							
RN: 100216977	CN: 604166967		Account No.: JE-0843-F					
Permit No.: O-02551		Project No.: 3683	Project No.: 36831					
Area Name: Ethylene/Propylene Crack Cogeneration	ter and	Company Name: BASF TOTAL Petrochemicals LLC						
I. CERTIFICATION TYPE (Please mark the appropriate box)								
\boxtimes Responsible Official		Duly Authoriz	ed Representative					
III. SUBMITTAL TYPE (Please)	nark the approp	oriate box) (Only or	e response can be acce	pted per form)				
SOP/TOP Initial Permit Application	on 🛛 Updat	e to Permit Applica	tion					
GOP Initial Permit Application	🗌 Permi	t Revision, Renewa	l, or Reopening					
Other:								
IV. CERTIFICATION OF TRUT	Ή							
This certification does not exter information for reference only.		ion which is desi	gnated by the TCEQ	as				
I, <u>John Lycan</u> (Certifier Name printed	or typed)	certify that I	am the <u>RO</u> (RO or D.	AR)				
and that, based on information and l dated during the time period or on t				nformation				
Note: Enter EITHER a Time Period completed. The certification is not v				ıst be				
Time Period: From	to							
Si	art Date	End Date						
Specific Dates: <u>11/5/2024</u> Date 1	Date 2	Date 3 Date	4 Date5	Date 6				
Signature:	m	Signa	ture Date: <u>11/5/20</u> 2	24				
Title:Vice President Port Arthur S	ite							
TCEQ-10009 (Revised 09/12) OP-CRO1 This form for use by facilities subject to air and may be revised periodically (APDG 583		irements		Page of				

Below are responses to questions on the application for Federal Operating Permit O2551:

Request 5 – Granted permit shield for NSPS RRR for unit ID R-2501X

a. We have updated the negative language for this unit to "*The source does not produce any products listed in NSPS RRR*". The following text has been removed as it raised confusion as to whether the rule was potentially applicable: "In addition, this source is *not a process vent, but rather a wastewater treatment vent subject to 40 CFR 63, Part YY as it is part of Unit ID HONWWTP.*" Please confirm this is acceptable.

<u>Response</u> - The language used for the permit shield for NSPS RRR for unit ID R-2501X, "The source does not produce any products listed in NSPS RRR", is acceptable to BTP.

Request 6 - The monitoring requirements of the AMOC are sufficient to satisfy the Periodic Monitoring and an OP-MON is not needed. However, please provide me with the conditions upon which the MPGF system is approved as referenced in the approval letter.

<u>Response</u> – The conditions upon which the MPGF system is approved as referenced in the approval letter are found in AMOC-220 and are attached to this response.

Working Draft Permit - A working draft permit was provided via email dated 10/17/2024.

<u>Response</u> – A thorough review of the working draft permit has been completed and BTP is requesting a few updates.

- 1. New Source Review Authorization Reference Table, page 83
 - Add a "*" to GHGPSDTX3 and a footnote that reads "*For reference, EPA Issued Permit PSD-TX-903-GHG has been assigned TCEQ permit number GHGPSDTX3." (BTP's existing TV Permit has this reference.)
 - b. BTP provided a revised OP-REQ1 form with the October 8, 2024 response to add PBRs 106.227/09/04/2000, 106.511/09/04/2000, 106.532/09/04/2000. Shouldn't these PBRs be listed in this table?
- 2. Unit ID TK-2501B is authorized under 36644, PSDTX933M5, and N007M1. Updated OP-2 and OP-PBRSUP forms are being submitted with this response to correct the NSR authorization.

Please note that any updates to the previously submitted OP-2 and OP-PBRSUP forms are presented via redline strikeout in the versions submitted with this submittal.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



Alternative Method of Control (AMOC) Plan, AMOC No.: AMOC-220 BASF TOTALEnergies Petrochemicals LLC NAFTA Regional Olefins Complex Multi-Point Ground Flare (MPGF) System Port Arthur, Jefferson County Regulated Entity Number: RN100216977

- 1. This AMOC Plan Authorization shall apply at the BASF TOTALEnergies Petrochemicals LLC (BASF), Port Arthur Ethylene Plant located in Port Arthur, Jefferson County and identified by Regulated Entity Number RN100216977. Under Title 30 Texas Administrative Code (TAC) Section 115.910 (§ 115.910) this plan authorizes the pressureassisted stages of a multi-point ground flare (MPGF) for use during high-pressure emission events such as planned maintenance, start-ups and shut-downs (MSS) as well as unplanned emergency and upset situations.
- 2.A copy of the AMOC application and the AMOC Plan provisions must be kept on-site or at a centralized location and made available at the request of personnel from the TCEQ or any pollution control agency with jurisdiction. The AMOC application is defined by the application received January 27, 2023 and supporting documentation submitted through March 28, 2023.
- 3. This authorization is granted under § 115.910 for emissions sources regulated by 30 TAC Chapter 115, Subchapter B: General Volatile Organic Compound Sources, Division 2: Vent Gas Control.

This AMOC shall apply in lieu of the requirements in these state regulations, as applicable. Compliance with this AMOC is independent of BASF's obligation to comply with all other applicable requirements of 30 TAC Chapter 115, TCEQ permits and applicable state and federal law. Compliance with the requirements of this plan does not assure compliance with requirements of an applicable New Source Performance Standard, applicable National Emission Standard for Hazardous Air Pollutants, or an Alternative Means of Emission Limitation (AMEL) and does not constitute approval of alternative standards for these regulations.

- 4. In accordance with 30 TAC § 115.913(c), all representations submitted for this plan, as well as the provisions listed here, become conditions upon which this AMOC Plan is issued. It is unlawful to vary from the emission limits, control requirements, monitoring, testing, reporting or recordkeeping requirements of this Plan.
- 5. The high-pressure MPGF system identified as X-8501 (EPN N-15), authorized under Permit Nos. 36644, PSDTX903M5, PSDGHGTX903, N007M1 and O2551 are subject to this AMOC plan. The MPGF system is manufactured by Callidus and is 12 stages with 28 pilots. When the pressure-assisted burners exceed the tip velocity portions of §60.18, §63.11, and 30 TAC 115, the MPGF stages will be operated, and compliance demonstrated, when the requirements in paragraph 6 are met.
- 6. The HP stages and burners of the MPGF shall be designed with no assist air and may use steam-assist during the pressure-assisted operations in accordance with the following requirements when regulated materials are routed to the flare(s) for at least 15-mintues, to achieve 98 % destruction and removal efficiency (DRE) for organic compounds with four or more carbon atoms, and 99% DRE for organic compounds with three or less carbon atoms.
 - A. <u>Operating Requirements</u>: The net heating value of the flare vent gas combustion zone (NHV_{cz}) must be greater than or equal to 800 British thermal units per standard cubic foot (Btu/scf) and when using steam-assist, the net heating value dilution parameter (NHV_{dil}) must be maintained at or above 22 Btu/ft², demonstrated by continuously complying with a 15-minute block average according to the following:
 - (1) <u>Determination of Net Heating Values NHV_{cz}, NHV_{vg}, and NHVdil</u>.
 - a) The net heating value of the vent gas (NHV_{vg}) shall be determined following 40 CFR § 63.670(I)(5)(ii)(A)-(B).
 - b) The net heating value of the combustion zone gas (NHV $_{cz}$) shall be determined per 40 CFR § 63.670(m)(1).

- c) The net heating value dilution parameter (NHV_{dil}) as specified in 40 CFR § 63.670(n)(1). Different monitoring methods may be used to determine vent gas composition for different gaseous streams provided the composition or net heating value of all gas streams that contribute to the flare vent gas are determined following the options and applicable requirements in 40 CFR §§ 63.670(j) and 63.670(l).
- (2) <u>Maximum Flare Tip Velocity</u> (V_{tip}). Calculation of V_{tip} is not applicable to the HP MPGF burners consistent with 40 CFR § 63.1103(e)(4)(vii)(A).
- (3) <u>Flare Vent Gas Flow Rate Requirements</u>. Install, operate, calibrate, and maintain a monitoring system capable of continuously measuring calculating, and recording the cumulative volumetric flow rates in the flare header or headers that feed the flare, including any supplemental natural gas and/or assist steam used with the flare. The flow rate monitoring systems must comply with 40 CFR § 63.670(i), as applicable. The flow rate monitoring system must be able to correct for the temperature and pressure of the system and output parameters in standard conditions following § 63.670(i)(1).
- (4) <u>Monitoring Requirements.</u> The operator must follow the calibration and maintenance procedures according to Table 2 below and 40 CFR § 63.671(a), (c), (d), and (e) for all monitors.
- B. <u>Pilot Flame Requirements</u>: The HP MPGF shall be operated with a flame present at all times when regulated material is routed to a given stage of HP burners in compliance with and monitored following 40 CFR §§ 63.670(b) and (g), or 63.1103(e)(4)(vii)(D). The distance between any two burners in series on a stage is no more than 6 feet when measured from the center of one burner to the next burner. Each stage which uses cross-lighting must comply with 40 CFR §§ 63.1103(e)(4)(vii)(E) and 40 CFR § 63.999.
- C. <u>Visible Emission Requirements</u>: When any HP flare stage is receiving regulated materials, the MPGF shall be operated with no visible emissions except for periods not to exceed a total of 5 minutes during any 2 consecutive hours and meet 40 CFR § 63.670(c) and (h).
- D. <u>Pressure Monitor and Stage Valve Position Indicator Requirements</u>: Install and operate pressure monitor(s) on the main flare header, as well as a valve position indicator monitoring system for each staging valve following 63.1103(e)(4)(vii)(F).
- E. <u>Continuous Monitoring Requirements:</u> Follow the specifications, calibration, and maintenance procedures according to the following:
 - (1) General.
 - (a) At all times, all monitoring equipment must operate and be maintained in a manner consistent with 40 CFR §§ 60.11(d), 63.6(e)(1)(i), 63.671(a), and Table 13 of MACT CC with the TCEQ as the Administrator.
 - (b) Any monitor downtime must comply with 40 CFR §§ 63.671(a)(4) and 63.671(c). The monitors and analyzers shall operate as required by this section at least 95% of the time when the flare is operational, averaged over a rolling 12-month period.
 - (c) Unless otherwise specified, each measurement taken by the monitoring systems shall comply with 40 CFR §63.671(d).
 - (2) <u>Composition or Net Heating Values</u>. Install, operate, calibrate, and maintain a monitoring system which meets one or more of the following:
 - (a) A calorimeter capable of continuously measuring, calculating, and recording the net heating value, NHVvg, present in the flare vent gas according to 40 CFR § 63.670(j)(3). The monitor shall meet the accuracy and calibration requirements of Table 13 of MACT CC.
 - (b) A gas chromatograph or gas chromatograph / mass spectrograph system for the NHVvg as specified in 40 CFR § 63.670(j)(1) or (2). Component properties determinations must follow 40 CFR § 63.670(l)(1) and Table 12 of MACT CC. The system used to determine compositional analysis shall follow 40 CFR § 63.671(e).

- (c) An optional hydrogen monitoring system may be used if capable of meeting 40 CFR § 63.670(j)(4). The hydrogen analyzer must meet the accuracy and calibration requirements of Table 13 of MACT CC.
- (3) Flow Rates.
 - (a) Different flow monitoring methods may be used to measure different gaseous streams and assist media streams provided that 40 CFR §63.670(i) is followed. Any flow rate monitoring system must follow 40 CFR §63.670(i)(1).
 - (b) The measurement location must be selected following Table 13 of MACT CC.
 - (c) All flow monitors shall meet the accuracy and calibration requirements of Table 13 of MACT CC.
- (4) Pilots.
 - (a) The pilot flame continuous monitoring must meet 40 CFR § 63.670(b).
 - (b) Loss of pilot flame is determined by and must meet 40 CFR §§63.670(b) or as specified in 63.1103(e)(4)(vii)(D) and the recordkeeping must meet 40 CFR § 63.655(i)(9)(i).
 - (c) A video camera that meets 40 CFR §63.670(h)(2) may be used to demonstrate compliance.
- (5) <u>Pressure</u>. Any pressure monitor must meet the accuracy and calibration requirements of Table 13 of MACT CC.
- (6) <u>Temperature.</u> Any temperature monitor used for correction purposes must meet the accuracy and calibration requirements of Table 13 of MACT CC.
- F. <u>Recordkeeping Requirements:</u> Keep records according to 40 CFR § 63.655(i)(9) and sufficient records to demonstrate compliance with this Special Condition.
- G. <u>Emission Determinations</u>. Calculations of hourly and annual emissions to determine compliance with permit limitations and emission inventories shall be determined and recorded using the monitoring data collected pursuant to this Plan applying the parameters measured during each 15-minute block period and the emission factors and emissions methodology represented in the most recent permit application. To calculate CH₄, CO₂, and N₂O greenhouse gas emissions, use the methodology in 40 CFR § 98.233(n)(4) (7).

Date:	11/05/2024
Permit No:	0-2551
Regulated Entity No.:	100216977
Company Name :	BASF TOTALEnergies Petrochemicals LLC

Revision	Revision	Unit/Group Process				
No.	Code	New Unit	ID No.	Applicable Form	NSR Authorization	Description of Changes and Provisional Terms and Conditions
1	MS-C	No	N/A	OP-REQ1	N/A	Provide updated Form OP-REQ1.
2	MS-C	No	See OP-PBRSUP	See OP-PBRSUP	See OP-PBRSUP	Submittal of OP-PBRSUP
3	MS-C	No	N/A		36644	Incorporate the Permit 36644 alteration dated June 14, 2023, into the Title V operation permit.
4	ADMIN-G	No	N/A		36644	Incorporate the Alternative Method of Control (AMOC) Plan, AMOC No. 220 dated April 28, 2023, into the Title V operation permit.
5	MS-C	No	N-15	OP-2 UA-15	36644, PSDTX903M5, N007M1	Add new scenario for existing process vents N-15 and N-15A and add 30 TAC Chapter 115 applicability for sending a process vent stream to a flare that requires a recently approved AMOC.
6	MS-C	No	N-15A	OP-2 UA-15	36644, PSDTX903M5, N007M1	Add new scenario for existing process vents N-15 and N-15A and add 30 TAC Chapter 115 applicability for sending a process vent stream to a flare that requires a recently approved AMOC.
7	MS-C	No	HONWWTP	OP-2	36644, PSDTX903M5, N007M1	Omit Group 1 MACT G wastewater requirements. The source is subject to site-wide only MACT G requirements. (Source is Group 2.)
8	MS-C	No	T-8201	OP-2	36644, PSDTX903M5, N007M1	Omit Group 1 MACT G wastewater requirements. The source is subject to site-wide only MACT G requirements. (Source is Group 2.)
9	SIG-B	No	T-5702	OP-2	36644, PSDTX903M5, N007M1	Omit NSPS NNN requirements. The source is subject to 40 CFR Part 63, Subpart G and 40 CFR Part 63, Subpart YY.
				OP-REQ2		Add negative applicability to 40 CFR Part 60, Subpart NNN.
10	SIG-B	No	R-2501X	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Omit NSPS RRR requirements. The reactor does not produce any products listed in NSPS RRR and is not considered a process vent. The source is a part of Unit ID HONWWTP which is a wastewater treatment system that is subject to 40 CFR Part 63, Subpart YY and 40 CFR Part 63, Subpart G.
						Add negative applicability for 40 CFR Part 60, Subpart RRR.
11	ADMIN-A	No	TK-9601R	OP-2	36644, PSDTX903M5, N007M1	Update Unit ID to coincide with facility records. Replace Unit ID TK-9601 with TK-9601R.
12	ADMIN-A	No	D-3730X	OP-2	36644, PSDTX903M5, N007M1	Update Unit ID to coincide with facility records. Replace Unit ID D-3780X with D-3730X.
13	MS-C	No	B-7240	OP-2 OP-UA6	36644, PSDTX903M5, N007M1	Add 40 CFR 63 Subpart DDDDD detailed rules to B-7240 for compliance with 63 Subpart DDDDD.
14	MS-C	No	B-7280	OP-2 OP-UA6	36644, GHGPSDTX3, PSDTX903M5, N007M1	Add 40 CFR 63 Subpart DDDDD detailed rules to B-7280 for compliance with 63 Subpart DDDDD.
15	MS-C	No	B-7290	OP-2 OP-UA6	36644, GHGPSDTX3, PSDTX903M5, N007M1	Add 40 CFR 63 Subpart DDDDD detailed rules to B-7290 for compliance with 63 Subpart DDDDD.

Date:	11/05/2024
Permit No:	0-2551
Regulated Entity No.:	100216977
Company Name :	BASF TOTALEnergies Petrochemicals LLC

Revision	Revision	Unit/Group Process				
No.	Code	New Unit	ID No.	Applicable Form	NSR Authorization	Description of Changes and Provisional Terms and Conditions
16	MS-C	No	N-12	OP-2 OP-UA6 OP-UA5	36644, PSDTX903M5, N007M1	Add 40 CFR 63 Subpart DDDDD detailed rules to N-12 for compliance with 63 Subpart DDDDD.
17	MS-C	No	N-13	OP-2 OP-UA6 OP-UA5	36644, PSDTX903M5, N007M1	Add 40 CFR 63 Subpart DDDDD detailed rules to N-13 for compliance with 63 Subpart DDDDD.
18	SIG-B	No	ТК-2501В	OP-2 OP-REQ2	106.262/11/01/2003, 106.478/09/04/2000 36644, PSDTX903M5, N007M1	Add negative 40 CFR Part 60, Subpart Kb applicability.
19	SIG-B	No	TK-2501	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Add negative 40 CFR Part 60, Subpart Kb applicability.
20	MS-C	No	X-8502	OP-2	36644, PSDTX903M5, N007M1	Remove scenarios associated with SOP Index No. 60A-1 and 60A-2
21	MS-C	Yes	T270596	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORGSV. Unit ID T270596 has the same regulatory applicability as GRPINORGSV.
22	MS-C	Yes	TK-7401	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORGSV. Unit ID TK-7401 has the same regulatory applicability as GRPINORGSV.
23	MS-C	Yes	TK-7601	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORGSV. Unit ID TK-7601 has the same regulatory applicability as GRPINORGSV.
24	MS-C	Yes	TK-2493	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORGSV. Unit ID TK-2493 has the same regulatory applicability as GRPINORGSV.
25	MS-C	Yes	TK-2491	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORGSV. Unit ID TK-2491 has the same regulatory applicability as GRPINORGSV.
26	MS-C	Yes	TK-9604	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORGSV. Unit ID TK-9604 has the same regulatory applicability as GRPINORGSV.
27	MS-C	Yes	TK-9801	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORGSV. Unit ID TK-9801 has the same regulatory applicability as GRPINORGSV.
28	MS-C	Yes	TK-5273	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPSV1K. Unit ID TK-5273 has the same regulatory applicability as GRPSV1K.
29	MS-C	Yes	ТК-5273Х	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPSV1K. Unit ID TK-5273X has the same regulatory applicability as GRPSV1K.
30	MS-C	Yes	TK-5510	OP-2 OP-SUMR	36644, PSDTX903M5, N007M1	Add storage vessel to GRPSV1K. Unit ID TK-5510 has the same regulatory applicability as GRPSV1K.
31	MS-C	Yes	T233674	OP-2 OP-SUMR	106.371/09/04/2000	Add storage vessel to GRPSV1K. Unit ID T233674 has the same regulatory applicability as GRPSV1K.
32	MS-C	Yes	T233676	OP-2 OP-SUMR	106.371/09/04/2000	Add storage vessel to GRPSV1K. Unit ID T233676 has the same regulatory applicability as GRPSV1K.
33	MS-C	Yes	T113596	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPSV1K. Unit ID T131632 has the same regulatory applicability as GRPSV1K.
34	MS-C	Yes	T131632	OP-2 OP-SUMR	106.371/09/04/2000	Add storage vessel to GRPSV1K. Unit ID T131632 has the same regulatory applicability as GRPSV1K.

Date:	11/05/2024
Permit No:	0-2551
Regulated Entity No.:	100216977
Company Name :	BASF TOTALEnergies Petrochemicals LLC

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

Revision	Revision		Unit/Group Proc	ess		
No.	Code	New Unit	ID No.	Applicable Form	NSR Authorization	Description of Changes and Provisional Terms and Conditions
35	MS-C	Yes	T280047	OP-2 OP-SUMR	106.371/09/04/2000	Add storage vessel to GRPSV1K. Unit ID T280047 has the same regulatory applicability as GRPSV1K.
36	SIG-B	Yes	ТК-1501	OP-2 OP-SUMR OP-UA3 OP-REQ2	106.472/09/04/2000	Add TK-1501 to Title V permit as submitted via Op-Notify on 07/08/2015 (Project No. 23146). Add negative 40 CFR Part 60, Subpart Kb applicability.
37	SIG-B	Yes	ТК-2210	OP-2 OP-SUMR OP-UA3 OP-REQ2	36644, PSDTX903M5, N007M1	Add storage vessel. Provide unit attribute information on Form OP-UA3. Add negative 40 CFR Part 60, Subpart Kb applicability.
38	SIG-B	Yes	ТК-2620	OP-2 OP-SUMR OP-UA3 OP-REQ2	106.472/09/04/2000	Add storage vessel. Provide unit attribute information on Form OP-UA3. Add negative 40 CFR Part 60, Subpart Kb applicability.
39	SIG-B	Yes	ТК-4020	OP-2 OP-SUMR OP-UA3 OP-REQ2	106.472/09/04/2000	Add storage vessel. Provide unit attribute information on Form OP-UA3. Add negative 40 CFR Part 60, Subpart Kb applicability.
40	SIG-B	Yes	T241176	OP-2 OP-SUMR OP-UA3 OP-REQ2	106.472/09/04/2000	Add storage vessel. Provide unit attribute information on Form OP-UA3. Add negative 40 CFR Part 60, Subpart Kb applicability.
41	ADMIN-A	No	GRPSV1K	OP-2 OP-REQ2		Update negative NSPS Kb language to current language. Negative applicability for MACT YY and Chapter 115 remain the same.
42	ADMIN-A	No	D-8001R	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Update negative NSPS Kb language to current language.
43	ADMIN-A	No	DSL-TK	OP-2 OP-REQ2	106.473/09/04/2000	Update negative NSPS Kb language to current language.
44	ADMIN-A	No	TK-2210X	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Update negative NSPS Kb language to current language.
45	ADMIN-A	No	TK-3110X	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Update negative NSPS Kb language to current language.
46	ADMIN-A	No	ТК-3710Х	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Update negative NSPS Kb language to current language.

TCEQ-10059 (APDG 5722v26, revised 03/22) OP-2

This form is for use by facilities subject to air quality permit requirements and

may be revised periodically. (Title V revised 03/10)

Date:	11/05/2024
Permit No:	0-2551
Regulated Entity No.:	100216977
Company Name :	BASF TOTALEnergies Petrochemicals LLC

Revision	Revision	Unit/Group Process				
No.	Code	New Unit	ID No.	Applicable Form	NSR Authorization	Description of Changes and Provisional Terms and Conditions
47	ADMIN-A	No	ТК-7403Х	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Update negative NSPS Kb language to current language.
48	ADMIN-A	No	ТК-9603Х	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Update negative NSPS Kb language to current language.

Permit By Rule Supplemental Table (Page 1) Table A: Registered Permits by Rule (30 TAC Chapter 106) for the Application Area Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
11/05/2024	0-2551	RN100216977

Unit ID No.	Registration No.	PBR No.	Registration Date
F-1	160345	106.261	03/16/2020
F-1	160348	106.261 / 106.262	03/25/2020
F-4	160348	106.261 / 106.262	03/25/2020
АН-009А	160348	106.261 / 106.262	03/25/2020
N-15 and N-15A	160348	106.261 / 106.262	03/25/2020
AH-006	164240	106.261 / 106.262	03/09/2021
AH-008	164240	106.261 / 106.262	03/09/2021
AH-010	164240	106.261 / 106.262	03/09/2021
F-1	167920	106.261/106.262	3/11/2022
F-1	169666	106.261	8/3/2022, 03/22/2023, 09/07/2023

Permit By Rule Supplemental Table (Page 1) Table A: Registered Permits by Rule (30 TAC Chapter 106) for the Application Area Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
11/05/2024	O-2551	RN100216977

Unit ID No.	Registration No.	PBR No.	Registration Date
MSS CAP	169666	106.263	8/3/2022, 03/22/2023, 09/07/2023
N-15 / N-15A	170435	106.261	10/07/2022
F-1	172347	106.261	06/21/2023

Permit By Rule Supplemental Table (Page 2) Table B: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for the Application Area Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
11/05/2024	O-2551	RN100216977

Unit ID No.	PBR No.	Version No./Date
DSL-TK	106.473	9/4/2000
F-2A	106.371	9/4/2000
MOD18	106.454	9/4/2000
TK-1701	106.478	9/4/2000
TK-1702	106.472	9/4/2000
TK-1703	106.472	9/4/2000
TK-1704	106.478	9/4/2000
TK-2501B	106.262 106.478	11/1/2003 9/4/2000
T270596	106.472	9/4/2000
TK-7401	106.472	9/4/2000
TK-7601	106.472	9/4/2000

Permit By Rule Supplemental Table (Page 2) Table B: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for the Application Area Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
11/05/2024	O-2551	RN100216977

Unit ID No.	PBR No.	Version No./Date
TK-2493	106.472	9/4/2000
TK-2491	106.472	9/4/2000
TK-9604	106.472	9/4/2000
TK-9801	106.472	9/4/2000
ТК-5273	106.472	9/4/2000
TK-5273X	106.472	9/4/2000
T233674	106.371	9/4/2000
T233676	106.371	9/4/2000
T113596	106.472	9/4/2000
T131632	106.371	9/4/2000
T280047	106.371	9/4/2000

Permit By Rule Supplemental Table (Page 2) Table B: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for the Application Area Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
11/05/2024	O-2551	RN100216977

Unit ID No.	PBR No.	Version No./Date
TK-1501	106.472	9/4/2000
TK-2620	106.472	9/4/2000
TK-4020	106.472	9/4/2000
T241176	106.472	9/4/2000
SDBZWD	106.227	9/4/2000
TMPENG	106.511	9/4/2000
SWPD	106.532	9/4/2000
SWWP	106.532	9/4/2000

Permit By Rule Supplemental Table (Page 3) Table C: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for Insignificant Sources for the Application Area Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
11/05/2024	0-2551	RN100216977

PBR No.	Version No./Date
106.102	9/4/2000
106.316	9/4/2000

Date	Permit Number	Regulated Entity Number
11/05/2024	O-2551	RN100216977

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
F-1	106.261	160345	Components are monitored per the site's leak detection and repair program.
F-1	106.261 / 106.262	160348	Components are monitored per the site's leak detection and repair program.
F-4	106.261 / 106.262	160348	Components are monitored per the site's leak detection and repair program.
AH-009A	106.261 / 106.262	160348	Monthly emissions calculations using measured process conditions.
N-15 and N-15A	106.261 / 106.262	160348	Monthly emissions calculations using measured process conditions.
AH-006	106.261 / 106.262	164240	Monthly emissions calculations using measured process conditions.
AH-008	106.261 / 106.262	164240	Monthly emissions calculations using measured process conditions.
AH-010	106.261 / 106.262	164240	Monthly emissions calculations using measured process conditions.
F-1	106.261 / 106.262	167920	Components are monitored per the site's leak detection and repair program.
F-1	106.261	169666	Components are monitored per the site's leak detection and repair program.
MSS CAP	106.263	169666	Maintain a record of the maintenance activity and associated emissions.

Date	Permit Number	Regulated Entity Number
11/05/2024	O-2551	RN100216977

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
N-15 / N-15A	106.261	170435	Monthly emission calculations using measured process conditions.
F-1	106.261	172347	Components are monitored per the site's leak detection and repair program.
DSL-TK	106.473	9/4/2000	Maintain a record of the material stored, loading rate, tank capacity, monthly emissions.
F-2A	106.371	9/4/2000	Maintain a record of cooling tower circulation rate.
MOD18	106.454	9/4/2000	Maintain a record of solvent used and the total solvent makeup per year.
TK-1701	106.478	9/4/2000	Maintain a record of the material stored, maximum true vapor pressures and associated emission calculations.
TK-1702	106.472	9/4/2000	Maintain a record of the material stored.
TK-1703	106.472	9/4/2000	Maintain a record of the material stored.
TK-1704	106.478	9/4/2000	Maintain a record of the material stored, maximum true vapor pressures and associated emission calculations.
T K 2501B	106.262	11/1/2003	Monthly emission calculations using measured process conditions.
T K-2501B	106.478	9/4/2000	Maintain a record of the material stored, maximum true vapor pressures and associated emission calculations.

Date	Permit Number	Regulated Entity Number
11/05/2024	O-2551	RN100216977

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
T270596	106.472	9/4/2000	Maintain a record of the material stored.
TK-7401	106.472	9/4/2000	Maintain a record of the material stored.
TK-7601	106.472	9/4/2000	Maintain a record of the material stored.
TK-2493	106.472	9/4/2000	Maintain a record of the material stored.
TK-2491	106.472	9/4/2000	Maintain a record of the material stored.
TK-9604	106.472	9/4/2000	Maintain a record of the material stored.
TK-9801	106.472	9/4/2000	Maintain a record of the material stored.
TK-5273	106.472	9/4/2000	Maintain a record of the material stored.
TK-5273X	106.472	9/4/2000	Maintain a record of the material stored.
T233674	106.371	9/4/2000	Maintain a record of the use for the material stored.
T233676	106.371	9/4/2000	Maintain a record of the use for the material stored.
T113596	106.472	9/4/2000	Maintain a record of the material stored.
T131632	106.371	9/4/2000	Maintain a record of the use for the material stored.

Date	Permit Number	Regulated Entity Number
11/05/2024	O-2551	RN100216977

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
T280047	106.371	9/4/2000	Maintain a record of the use for the material stored.
TK-1501	106.472	9/4/2000	Maintain a record of the material stored.
TK-2620	106.472	9/4/2000	Maintain a record of the material stored.
TK-4020	106.472	9/4/2000	Maintain a record of the material stored.
T241176	106.472	9/4/2000	Maintain a record of the material stored.
SDBZWD	106.227	9/4/2000	Maintain a record of material used.
TMPENG	106.511	9/4/2000	Maintain records of hours of operation.
SWPD	106.532	9/4/2000	Maintain a record of the function of the wastewater treatment system.
SWWP	106.532	9/4/2000	Maintain a record of the function of the wastewater treatment system.

From:	Tammy Villarreal <tvillarreal@clara-vista.com></tvillarreal@clara-vista.com>
Sent:	Wednesday, October 30, 2024 12:10 PM
То:	Kyle Murray
Cc:	Jacob Benfield; BTPEnvironmental; Theresa Hulvey; Tammy Villarreal
Subject:	RE: [EXT] Working Draft Permit FOP O2551/Project 36831, BASF
	TOTALEnergies Petrochemicals, LLC
Attachments:	STEERS Title V Application Submittal (Update)

Hi Mr. Murray: Thanks for the extension!

As for the October 8th submittal via STEERS, this was not a new renewal application, but was intended to be the official response to your September 9th request for additional information. We had tied the October 8th STEERS submittal to the existing TCEQ Project Number (#36831) as shown in the attached STEERS confirmation email but it appears STEERS assumed it was new application. Please use the October 8th STEERS submittal as the RO certified response to your September 9th request for information. Thanks

Tammy

Tammy Villarreal, P.E.

Clara Vista Environmental, LLC (281) 728-4093

From: Kyle Murray <Kyle.Murray@tceq.texas.gov>
Sent: Wednesday, October 30, 2024 11:52 AM
To: Tammy Villarreal <TVillarreal@clara-vista.com>
Cc: Jacob Benfield <jacob.benfield@basf.com>; BTPEnvironmental <BTPEnvironmental@basf.com>;
Theresa Hulvey <thulvey@clara-vista.com>
Subject: RE: [EXT] Working Draft Permit -- FOP O2551/Project 36831, BASF TOTALEnergies
Petrochemicals, LLC

Good morning Ms. Villarreal,

This will not be an issue. You may have until November 8th to respond.

On a separate note, TCEQ received an additional renewal submission for FOP O2551 on October 8th. All documents in this new submission appear to be identical to the current renewal submission (pertaining to this email correspondence). Please let me know if there was meant to be updates associated with the submission or if it was submitted by mistake. Thank you!

Sincerely,

Kyle J. Murray

Permit Reviewer OA/Air Permits Division/OP Section

From:	steers@tceq.texas.gov
Sent:	Tuesday, October 8, 2024 10:42 AM
То:	Theresa Hulvey; john.lycan@basf.com; Tammy Villarreal
Subject:	STEERS Title V Application Submittal (Update)

This confirms the submittal of your Title V Existing Application to the TCEQ.

Your application was successfully submitted and received by the TCEQ at 10/08/2024 10:42 AM.

The submitted application will now be reviewed by the program area. You will be notified by the program area reviewing your application if more information is needed and of final action (approval or denial) of the application.

The Reference number for this submittal is 687236.

The Area ID for this submittal is 2551. The Project ID for this submittal is 36831. The STEERS confirmation number for this submittal is 569580. The hash code for this submittal is CC4610829D84DA2C1D08B8BEBB448395B50EA2057E7993E57DDA0D41D9D3B4A6.

You may access the copy of record (submitted application) from the submit log which is available by selecting Submissions from the Home page of STEERS https://www3.tceq.texas.gov/steers/.

If you have any questions, please contact the Air Permits division at 512-239-1250 or by email at airperm@tceq.texas.gov.

Best Regards,

Kyle J. Murray Environmental Permit Specialist (III) TCEQ – APD – OP Section (Title V) (512) 239-1279

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

Texas Commission on Environmental Quality MC 163, P.O. Box 13087 Austin, TX 78711-3087 kyle.murray@tceq.texas.gov

Phone: (512) 239-1279 Fax: (512) 239-1400



How are we doing? Fill out our online customer satisfaction survey at <u>www.tceq.texas.gov/customersurvey</u>

From: Tammy Villarreal <<u>TVillarreal@clara-vista.com</u>> Sent: Wednesday, October 30, 2024 11:31 AM To: Kyle Murray <<u>Kyle.Murray@tceq.texas.gov</u>> Cc: Jacob Benfield <<u>jacob.benfield@basf.com</u>>; BTPEnvironmental <<u>BTPEnvironmental@basf.com</u>>; Tammy Villarreal <<u>TVillarreal@clara-vista.com</u>>; Theresa Hulvey <<u>thulvey@clara-vista.com</u>> Subject: RE: [EXT] Working Draft Permit -- FOP O2551/Project 36831, BASF TOTALEnergies Petrochemicals, LLC

Hello Mr. Murray,

On behalf of BASF TotalEnergies Petrochemicals, LLC (BTP), I'm requesting an extension to respond to your request below. Both the plant manager (RO) and the technical contact are out of the office all this week and we are unable to finalize the response. If possible, we would like to request until November 8th to respond. This will give BTP time to get back into the office and review and submit the response. Thank you for your time.

Best regards, Tammy **Tammy Villarreal, P.E.** Clara Vista Environmental, LLC (281) 728-4093

From:	Kyle Murray
Sent:	Wednesday, October 23, 2024 9:10 AM
То:	Theresa Hulvey
Cc:	TVillarreal@clara-vista.com
Subject:	RE: [EXT] Working Draft Permit FOP O2551/Project 36831, BASF
	TOTALEnergies Petrochemicals, LLC

Good morning Theresa,

Thank you for reaching out. The guidance in the September 9th email is correct to follow. Since you have submitted the previous updates through STEERS then no further certification would be required. Unfortunately, these submitted documents can occasionally take some time to reach the permit reviewer as they have to be processed by management. Please disregard my request for an original OP-CRO1 in my previous email. I do appreciate the updated files sent via email as it allows me (and any future permit reviewer) to immediately continue work on the application. Let me know if you have any further questions.

Sincerely,

Kyle J. Murray

Permit Reviewer OA/Air Permits Division/OP Section Texas Commission on Environmental Quality MC 163, P.O. Box 13087 Austin, TX 78711-3087 kyle.murray@tceq.texas.gov

Phone: (512) 239-1279 Fax: (512) 239-1400



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

From: Theresa Hulvey <<u>thulvey@clara-vista.com</u>>
Sent: Wednesday, October 23, 2024 8:53 AM
To: Kyle Murray <<u>Kyle.Murray@tceq.texas.gov</u>>
Cc: Tammy Villarreal <<u>TVillarreal@clara-vista.com</u>>; Theresa Hulvey <<u>thulvey@clara-vista.com</u>>
Subject: Fw: [EXT] Working Draft Permit -- FOP O2551/Project 36831, BASF TOTALEnergies
Petrochemicals, LLC

Good morning Kyle,

We are trying to understand why your October 17th email requested an original signature OP-CRO1 form that lists the October 8th response as well as the date of the response to the latest revised WDP.

BTP submitted the response to the first revised WDP on October 8th via STEERS (Please see the attached email, which provides details of the submittal). It was our understanding that submittal of the response in STEERS did not require an OP-CRO1 form as the signature in STEERS takes the place of an original OP-CRO1 signature. We sent you an email that morning with the files that were uploaded into STEERS as a courtesy. We did this to let you know the response was submitted in a timely fashion and to inform you of the details of the response as we don't know the process of how STEERS uploads reach the correct permit reviewer. The email was not meant to be the 'official' response. We thought we were following the guidance noted in your September 9th email: "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."

We would like the option of submitting WDP responses via STEERS, but want to make sure all the required documentation is included with each upload.

Are OP-CRO1 forms needed when submitting WDP responses in STEERS? Is there a different reason as to why an original signed OP-CRO1 form might be needed for this application?

Thank you in advance for your help.

Regards,

Theresa Hulvey

Clara Vista Environmental, LLC

thulvey@clara-vista.com

From: Kyle Murray <Kyle.Murray@tceq.texas.gov>
Sent: Thursday, October 17, 2024 1:51 PM
To: Jacob Benfield <jacob.benfield@basf.com>
Cc: Tammy Villarreal <TVillarreal@clara-vista.com>
Subject: RE: [EXT] Working Draft Permit -- FOP O2551/Project 36831, BASF TOTALEnergies
Petrochemicals, LLC

Good afternoon Mr. Benfield,

I have implemented the revisions addressed in your response and attached a revised WDP. Changes to the document (1-4) and additional requests (5-6) are as follows:

- 1. Added MACT DDDDD requirements for unit IDs N-12 and N-13 based on your OP-UA5 submission.
- 2. Updated NSPS Kb negative applicability language for GRPSV1K and additional sources. Added Unit ID T280047 to GRPSV1K.
- 3. Updated NSPS NNN negative applicability citation and reasoning for unit ID T-5702.
- 4. Removed the individual unit IDs T-8201 and HONWWTP from the permit document as all requirements are contained in the Site-Wide Special Terms and Conditions.
- 5. Granted permit shield for NSPS RRR for unit ID R-2501X
 - a. We have updated the negative language for this unit to "The source does not produce any products listed in NSPS RRR". The following text has been removed as it raised confusion as to whether the rule was potentially applicable: "In addition, this source is not a process vent, but rather a wastewater treatment vent subject to 40 CFR 63, Part YY as it is part of Unit ID HONWWTP." Please confirm this is acceptable.
- 6. The monitoring requirements of the AMOC are sufficient to satisfy the Periodic Monitoring and an OP-MON is not needed. However, please provide me with the conditions upon which the MPGF system is approved as referenced in the approval letter.

Please review the revised WDP and submit to me any additional comments by **Thursday**, **October 31**st or sooner if possible. Thank you!

Additionally, please provide certification for the application updates submitted on 10/08/2024 with your response. You can list that on the specific date section of form OP-CRO1. Please also include certification for the date of your response to this email on the OP-CRO1. You can submit the form in STEERS, or you may email me a scanned copy followed by the original in the mail.

Sincerely,

Kyle J. Murray

Permit Reviewer OA/Air Permits Division/OP Section Texas Commission on Environmental Quality MC 163, P.O. Box 13087 Austin, TX 78711-3087 kyle.murray@tceq.texas.gov

Phone: (512) 239-1279 Fax: (512) 239-1400



How are we doing? Fill out our online customer satisfaction survey at <u>www.tceq.texas.gov/customersurvey</u>

From:	Tammy Villarreal <tvillarreal@clara-vista.com></tvillarreal@clara-vista.com>
Sent:	Tuesday, October 8, 2024 1:24 PM
То:	Kyle Murray
Cc:	Jacob Benfield; Lois McQuade; Theresa Hulvey; Tammy Villarreal
Subject:	RE: [EXT] Working Draft Permit FOP O2551/Project 36831, BASF
	TOTALEnergies Petrochemicals, LLC
Attachments:	WDP-O2551 BTP Renewal, 36831 - Sept 2024 Responses TCEQ EPA
	email.pdf

Dear Mr. Murray,

On behalf of BASF TOTALEnergies Petrochemicals, LLC (BTP), please find the attached response to your emailed questions below. The official response was submitted via STEERS this morning. Please feel free to contact Mr. Jacob Benfield at BTP if you should have any additional questions.

Best regards, Tammy

Tammy Villarreal, P.E. Clara Vista Environmental, LLC (281) 728-4093

Texas Commission on Environmental Quality

Title V Existing

2551

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	ETHYLENE / PROPYLENE CRACKER AND COGENERATION
Does the site have a physical address?	No
Because there is no physical address, describe how to locate this site:	Intx of Hwy 73 and Hwy 366 Gate 99
City	Port Arthur
State	ТХ
ZIP	77642
County	JEFFERSON
Latitude (N) (##.######)	29.952777
Longitude (W) (-###.######)	93.885
Primary SIC Code	2869
Secondary SIC Code	
Primary NAICS Code	325110
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN100216977
What is the name of the Regulated Entity (RE)?	BASF TOTAL FINA NAFTA REGION OLEFINS COMPLEX
Does the RE site have a physical address?	No
Because there is no physical address, describe how to locate this site:	ON SH 366 GATE 99 AT INTX N HIGHWAY 366 & HIGHWAY 73
City	PORT ARTHUR
State	ТХ
ZIP	77642
County	JEFFERSON
Latitude (N) (##.######)	29.903888
Longitude (W) (-###.######)	-94.055
Facility NAICS Code	
What is the primary business of this entity?	PETROCHEMICAL MANUFACTURING PLANT

Customer (Applicant) Information

How is this applicant associated with this site? What is the applicant's Customer Number (CN)? Type of Customer Full legal name of the applicant: Legal Name Texas SOS Filing Number Federal Tax ID State Franchise Tax ID State Sales Tax ID Owner Operator CN604166967

Corporation

Basf Totalenergies Petrochemicals Llc 801691640 223620488 12236204884 Local Tax ID DUNS Number Number of Employees Independently Owned and Operated?

Responsible Official Contact

Person TCEQ should contact for questions about this application: **Organization Name** Prefix First Middle Last Suffix Credentials Title Enter new address or copy one from list: Mailing Address Address Type Mailing Address (include Suite or Bldg. here, if applicable) Routing (such as Mail Code, Dept., or Attn:) City State ZIP Phone (###-####-#####) Extension Alternate Phone (###-#####) Fax (###-####-####) E-mail

Technical Contact

Address Type

Person TCEQ should contact for questions about this application: Select existing TC contact or enter a new contact. Organization Name Prefix First Middle Last Suffix Credentials Title Enter new address or copy one from list: Mailing Address BASF CORPORATION

LYCAN

JOHN

VICE PRESIDENT PORT ARTHUR SITE MANAGER

Domestic PO BOX 2506

PORT ARTHUR TX 77643 4099605224

4099601750 john.lycan@basf.com

New Contact

BASF Corporation MR Jacob

Benfield

Senior Environmental & Sustainability Specialist Responsible Official Contact

Domestic

78499192 251-500 Yes PO BOX 2506

PORT ARTHUR TX 77643 9154338774

jacob.benfield@basf.com

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	29 Deg 57 Min 10 Sec
3) Permit Longitude Coordinate:	93 Deg 53 Min 6 Sec
 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.	2551-36831
5) 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.

[File Properties]

File Name

WDP-O2551 BTP Renewal 36831 - September 2024 Responses.pdf

Hash MIME-Type 8388F47D3A27E7CF108FBE458F19A77BF67B95088A66629D9563A9495FBE9DA5

application/pdf

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

Certification

I certify that I am the Responsible Official 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 John Lycan, the owner of the STEERS account ER075915.
- 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 enforcement 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 2551.
- 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: John Lycan OWNER OPERATOR

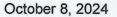
Account Number:	ER075915
Signature IP Address:	130.41.172.186
Signature Date:	2024-10-08
Signature Hash:	8B49C0B1E92A4B2BDCCECBBBBF5B90FB66C166A46F785936829EDAF1B9B98B7E
Form Hash Code at time of Signature:	CC4610829D84DA2C1D08B8BEBB448395B50EA2057E7993E57DDA0D41D9D3B4A6

Submission

Reference Number:	The application reference number is 687236
Submitted by:	The application was submitted by ER075915/John Lycan
Submitted Timestamp:	The application was submitted on 2024-10-08 at 10:42:06 CDT
Submitted From:	The application was submitted from IP address 130.41.172.186
Confirmation Number:	The confirmation number is 569580
Steers Version:	The STEERS version is 6.82

Additional Information

Application Creator: This account was created by Theresa C Hulvey



Via Overnight Delivery Mr. Kyle Murray Operating Permits Section, Air Permits Division, MC 163 Texas Commission on Environmental Quality (TCEQ) P.O. Box 13087 Austin, TX 78711-3087

Subject: Title V Permit O2551 Renewal/Revision - Updates to Application TCEQ Project No. 36831 BASF TOTALEnergies Petrochemicals LLC NAFTA Regional Olefins Complex Port Arthur, Jefferson County RN100216977, CN604166967

Dear Mr. Murray:

BASF TOTALEnergies Petrochemicals LLC (BTP) is submitting responses to the questions/comments associated with the Working Draft Permit (WDP) received via email on September 9, 2024. The WDP is associated with the renewal/revision of Federal Operating Permit O2551, which authorizes the operation of the BTP NAFTA Regional Olefins Complex located in Port Arthur, Jefferson County, Texas.

If there are any questions related to this submittal, please contact Mr. Jacob Benfield at (915) 433-8774 or via e-mail at jacob.benfield@basf.com.

Sincerely,

John Lycan Vice President, Port Arthur Site BASF TOTALEnergies Petrochemicals, LLC

CC: Sarah Kirksey, TCEQ Region 10, Air Section Manager R6AirPermitsTX@epa.gov

Enclosures

Below are responses to questions on the application for Federal Operating Permit O2551:

 Form OP-REQ1, Pages 85-86 – Question XII.B.1 was checked "Yes" indicating that a standard permit is used in the permit area. XII.B.2 was checked "Yes" indicating it was the pollution control project standard permit under 30 TAC 116.617. However, there are no active standard permit registrations listed in our NSR database for this site. Please remove the answers for XII.B.2-B.16, correct XII.B.1 to "No", and submit corrected pages. If you believe there is a standard permit in use, please provide an explanation and the standard permit registration number.

<u>Response</u> – OP-REQ1, Pages 85-86 are being re-submitted with this response.

2. Form OP-REQ1, Page 87

- a. NSR permit 36644 was listed in section XII.G, NSR Authorizations with FCAA §112(g) Requirements. This pertains to NSR permits that have case-by-case MACT requirements since a MACT has not been promulgated for the necessary source category. If the NSR permit does not contain that type of requirement, then it should be listed in section XII.H instead (since that addresses the remainder of 30 TAC Chapter 116 permits). Please confirm the proper section and submit a corrected page if needed.
- b. AMOC 220 was listed in section XII.H. AMOCs are not authorizations that should be listed on this form. Please remove AMOC 220 and submit a corrected page.

<u>Response</u> – OP-REQ1, Page 87 is being re-submitted with this response.

3. Form OP-PBRSUP – Table B | Form OP-REQ1 – Page 88

a. PBRs 106.227/09/04/2000, 106.511/09/04/2000, 106.532/09/04/2000 are listed in Table B of the OP-PBRSUP and are also required to be listed on Page 88 of the OP-REQ1. Please update and redate the OP-REQ1 and provide me with a copy of the corrected page.

<u>Response</u> – OP-REQ1, Page 88 is being re-submitted with this response.

4. Form OP-UA5 | Unit IDs N-12 & N-13 – Prior to the completion of our rule analysis for MACT DDDDD, these two units were entered on OP-UA5 in our database as a placeholder. I have added requirements based on the OP-UA6 in the application. Please verify whether units N-12 and N-13 are process heaters or boilers as defined by MACT DDDDD. If they are process heaters, please fill out the MACT DDDDD tables on OP-UA5 instead. If they are boilers, no further updates are needed.

<u>Response</u> – N-12 and N-13 are process heaters, therefore OP-UA5, Table 6a is being submitted with this response.

5. NSPS Kb Negative Applicability for Unit ID T280047 – For Revision No. 35 on the OP-2, Unit ID T280047 was requested to be added to GRPSV1K. However, this unit is listed on the OP-REQ2 with a negative applicability reason for 40 CFR Part 60, Subpart Kb of "This source has a capacity of less than 19,800 gallons (75 m3)". GRPSV1K already has an existing permit shield for NSPS Kb with a reason of "Capacity of storage vessel is less than 10,600 gallons." Since every group member must have identical information, please confirm if the NSPS Kb reason should be updated to the newer language and also confirm that the other two existing permit shields should be retained by the group. Instead of listing T280047 on OP-REQ2, please list GRPSV1K with all desired permit shields and provide the updated form.

<u>Response</u> – Unit ID T280047 should be included in GRPSV1K and the NSPS Kb negative applicability for the group should be updated to the new language, "The storage tanks have a capacity of less than 19,800 gallons (75 m³)."

The negative applicability for Chapter 115, Storage of VOCs and NSPS YY are correct and do not need to be changed.

An updated OP-REQ2 form is being submitted to update the NSPS Kb negative language for GRPSV1K and seven additional sources.

6. NSPS NNN Negative Applicability for Unit ID T-5702 – The negative applicability reason for NSPS NNN cites rule overlap with MACT G and with MACT YY. While it is not as common for multiple MACTs to apply to the same source, the shield has been tentatively granted. However, the existing permit only has MACT G requirements for this unit. Please confirm if MACT YY is needed as well by listing it on OP-UA1. Or, if only MACT G applies, please revise the negative applicability reason on the OP-REQ2 and provide the updated form.

<u>Response</u> – We agree that MACT YY is not applicable to Unit ID T-5702. An updated OP-REQ2 referencing only MACT G superseding NSPS NNN is being submitted.

7. NSPS RRR Negative Applicability for Unit ID R-2501X – A permit shield was requested for NSPS RRR since it does not produce products listed in NSPS RRR and is not a process vent but is a wastewater treatment vent subject to MACT YY (part of unit ID HONWWTP). NSPS RRR is not potentially applicable to a wastewater vent, and permit shields are only granted for potentially applicable rules (for example, if R-2501X was a reactor process vent in chemical production but just not the specified chemicals, a permit shield could be granted). Therefore, the permit shield has not been added. Please note this does not add any requirements. Let me know if you have questions.

<u>Response</u> – While the draft permit removes NSPS RRR regulatory requirements, the Emission Unit Name is 'Spent Caustic Reactor'. To avoid future confusion and the fact that it was once subject to NSPS RRR, we are asking to have a permit shield for NSPS RRR.

- 8. Form OP-UA58 Unit ID T-8201 There are discrepancies in the existing answer codes on Table 3c of OP-UA58 for MACT G. Please provide an updated OP-UA58 form with the corrections below, re-dated.
 - a. The form instructions indicate that Performance Tests should not be answered if the Control Device Type code is "FLARE". Please remove the answer for Performance Tests.
 - b. Please provide an answer for the Continuous Monitoring question. The form instructions do not mention that units with a Control Device Type code of "FLARE" should also answer this, but that is an error. This information is needed.

<u>Response</u> – Unit ID T-8201 is Group 2 MACT G, is only subject to Site-Wide Special Terms and Conditions, and OP-UA58 is not required to be submitted. Responses in the originally submitted OP-REQ1 Sections VIII.C.20 through VIII.C.23 are consistent with this determination.

9. Unit IDs N-15 & N-15A – For the new operating scenarios incorporating the recently approved AMOC for 30 TAC Chapter 115, Vent Gas Control, additional monitoring is required since the applicable citations do not include adequate monitoring or recordkeeping requirements. Please provide an OP-MON form identifying periodic monitoring for Unit ID N-15, Index No. R5121-AMOC and for Unit N-15A, Index No. R5121-AMOC.

<u>Response</u> – The monitoring requirements in the AMOC are sufficient to meet Periodic Monitoring and BTP will comply with the monitoring specified in the AMOC, therefore OP-MONs are not required.

10. Major NSR Summary Table – Please review the table for NSR 36644/PSDTX903M5/N007M1 and mark any updates needed based on the 08/10/2023 action.

<u>Response</u> – The Major NSR Summary Table does not require any updates as the 08/10/2023 action was an alteration with no changes in emissions and no changes to Special Conditions (SC) except for the addition of SC 13.G. Since the NSR Summary Table only lists high level SC numbers (ie. SC 13) there are no updates required.

Working Draft Permit - A working draft permit was provided via email dated 9/9/2024.

<u>Response</u> – As was discussed between our consultant, Clara Vista Environmental LLC and you on September 17th, BTP will conduct a more thorough detailed review of the working draft permit with the next version.

Please note that any updates to the previously submitted OP-2 and OP-REQ2 form are presented via redline strikeout in the versions submitted with this submittal. We are also submitting a revised OP-1, Page 3, to update the Technical Contact for the project.

Date:	09/30/2024		
Permit No.:	O-2551		
RN No.:	RN100216977		

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

Forn	Form OP-REQ1: Page 85						
XII.	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		

Date:	09/30/2024
Permit No.:	O-2551
RN No.:	RN100216977

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

Form	Form OP-REQ1: Page 86						
XII.	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. <i>If the response to XII.B.12 is "NO," go to Question XII.B.15.</i>	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. \Box YES \boxtimes NC					
	D.	Multiple Plant Permits					
		1. The application area includes at least one Multi-Plant Permit NSR authorization.					

Date:	09/30/2024	
Permit No.:	O-2551	
RN No.:	RN100216977	

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

Form OP-REQ1: Page	87				
XII. NSR Authorizatio	ons (Attach	additional sheets if no	ecessary	for sections E-J)	
E. PSD Permit	s and PSD I	Major Pollutants			
PSD Permit No.: GHGPS	DTX3*	Issuance Date: 08/24	/2012	Pollutant(s): GHG	
PSD Permit No.: PSDTX	903M5	Issuance Date: 08/10	/2023	Pollutant(s): VOC, I	NOx, CO, PM, HAPS
PSD Permit No.:		Issuance Date:		Pollutant(s):	
PSD Permit No.:		Issuance Date:		Pollutant(s):	
If PSD Permits are held Technical Forms headin					try Table located under the <u>stml</u> .
F. Nonattainm	ent (NA) Pe	ermits and NA Major	Polluta	nts	
NA Permit No.: N007M1		Issuance Date: 08/10/	/2023	Pollutant(s): VOC, N	NOx
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 fo Technical Forms heading					y Table located under the <u>stml</u> .
G. NSR Autho	rizations wi	th FCAA § 112(g) Re	quireme	nts	
NSR Permit No.:	Issuand	e Date:	NSR Permit No.: Issuance Date:		Issuance Date:
NSR Permit No.:	Issuand	e Date:	NSR Pe	ermit No.:	Issuance Date:
NSR Permit No.:	Issuand	e Date:	NSR Pe	ermit No.:	Issuance Date:
NSR Permit No.: Issuanc		e Date:	NSR Permit No.:		Issuance Date:
	-	16 Permits, Special I y Rule, PSD Permits,	· · · · ·		Other Authorizations ation Area
Authorization No.: 36644 Issuance		ce Date: 08/10/2023 Authori		ization No.:	Issuance Date:
Authorization No.: Issuance D		e Date:	Authori	zation No.:	Issuance Date:
Authorization No.: Issuance Dat		e Date:	Authorization No.:		Issuance Date:
Authorization No.:	e Date:	Authori	ization No.:	Issuance Date:	

*For reference, EPA Issued Permit PSD-TX-903-GHG has been assigned TCEQ permit number GHGPSDTX3.

Date:	09/30/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 88

XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)

• I. Permits by Rule (30 TAC Chapter 106) for the Application Area

A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.

FOF application is available in the instructions.			
PBR No.: 106.261	Version No./Date: 09/04/2000		
PBR No.: 106.261	Version No./Date: 11/1/2003		
PBR No.: 106.262	Version No./Date: 9/4/2000		
PBR No.: 106.262	Version No./Date: 11/1/2003		
PBR No.: 106.263	Version No./Date: 11/1/2001		
PBR No.: 106.371	Version No./Date: 9/4/2000		
PBR No.: 106.454	Version No./Date: 9/4/2000		
PBR No.: 106.472	Version No./Date: 9/4/2000		
PBR No.: 106.473	Version No./Date: 9/4/2000		
PBR No.: 106.478	Version No./Date: 9/4/2000		
PBR No.: 106.227	Version No./Date: 9/4/2000		
PBR No.: 106.511	Version No./Date: 9/4/2000		
PBR No.: 106.532	Version No./Date: 9/4/2000		
PBR No.:	Version No./Date:		
PBR No.:	Version No./Date:		
PBR No.:	Version No./Date:		
♦ J. Municipal Solid Waste and Industrial Hazardous Waste Permits With an Air Addendum			
Permit No.:	Issuance Date:		
Permit No.:	Issuance Date:		
Permit No.:	Issuance Date:		
Permit No.:	Issuance Date:		

Process Heater/Furnace Attributes Form OP-UA5 (Page 10) Federal Operating Permit Program Table 6a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63) Subchapter DDDDD: Industrial, Commercial, and Institutional Process Heaters Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.	
09/30/2024	O-2551	RN100216977	

Unit ID No.	SOP/GOP Index No.	Commence	Table Applicability	HCl Emission	HCI-CMS
N-12	63DDDDD	EXIST	T3.3G1		
N-13	63DDDDD	EXIST	T3.3G1		

Date:	09/30/2024
Permit No:	0-2551
Regulated Entity No.:	100216977
Company Name :	BASF TOTALEnergies Petrochemicals LLC

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

Revision	Revision		Unit/Group Proc	ess		
No.	Code	New Unit	ID No.	Applicable Form	NSR Authorization	Description of Changes and Provisional Terms and Conditions
1	MS-C	No	N/A	OP-REQ1	N/A	Provide updated Form OP-REQ1.
2	MS-C	No	See OP-PBRSUP	See OP-PBRSUP	See OP-PBRSUP	Submittal of OP-PBRSUP
3	MS-C	No	N/A		36644	Incorporate the Permit 36644 alteration dated June 14, 2023, into the Title V operation permit.
4	ADMIN-G	No	N/A		36644	Incorporate the Alternative Method of Control (AMOC) Plan, AMOC No. 220 dated April 28, 2023, into the Title V operation permit.
5	MS-C	No	N-15	OP-2 UA-15	36644, PSDTX903M5, N007M1	Add new scenario for existing process vents N-15 and N-15A and add 30 TAC Chapter 115 applicability for sending a process vent stream to a flare that requires a recently approved AMOC.
6	MS-C	No	N-15A	OP-2 UA-15	36644, PSDTX903M5, N007M1	Add new scenario for existing process vents N-15 and N-15A and add 30 TAC Chapter 115 applicability for sending a process vent stream to a flare that requires a recently approved AMOC.
7	MS-C	No	HONWWTP	OP-2	36644, PSDTX903M5, N007M1	Omit Group 1 MACT G wastewater requirements. The source is subject to site-wide only MACT G requirements. (Source is Group 2.)
8	MS-C	No	T-8201	OP-2	36644, PSDTX903M5, N007M1	Omit Group 1 MACT G wastewater requirements. The source is subject to site-wide only MACT G requirements. (Source is Group 2.)
9	SIG-B	No	T-5702	OP-2	36644, PSDTX903M5, N007M1	Omit NSPS NNN requirements. The source is subject to 40 CFR Part 63, Subpart G and 40 CFR Part 63, Subpart YY.
				OP-REQ2		Add negative applicability to 40 CFR Part 60, Subpart NNN.
10	SIG-B	No	R-2501X	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Omit NSPS RRR requirements. The reactor does not produce any products listed in NSPS RRR and is not considered a process vent. The source is a part of Unit ID HONWWTP which is a wastewater treatment system that is subject to 40 CFR Part 63, Subpart YY and 40 CFR Part 63, Subpart G.
						Add negative applicability for 40 CFR Part 60, Subpart RRR.
11	ADMIN-A	No	TK-9601R	OP-2	36644, PSDTX903M5, N007M1	Update Unit ID to coincide with facility records. Replace Unit ID TK-9601 with TK-9601R.
12	ADMIN-A	No	D-3730X	OP-2	36644, PSDTX903M5, N007M1	Update Unit ID to coincide with facility records. Replace Unit ID D-3780X with D-3730X.
13	MS-C	No	B-7240	OP-2 OP-UA6	36644, PSDTX903M5, N007M1	Add 40 CFR 63 Subpart DDDDD detailed rules to B-7240 for compliance with 63 Subpart DDDDD.
14	MS-C	No	B-7280	OP-2 OP-UA6	36644, GHGPSDTX3, PSDTX903M5, N007M1	Add 40 CFR 63 Subpart DDDDD detailed rules to B-7280 for compliance with 63 Subpart DDDDD.
15	MS-C	No	B-7290	OP-2 OP-UA6	36644, GHGPSDTX3, PSDTX903M5, N007M1	Add 40 CFR 63 Subpart DDDDD detailed rules to B-7290 for compliance with 63 Subpart DDDDD.

Date:	09/30/2024
Permit No:	0-2551
Regulated Entity No.:	100216977
Company Name :	BASF TOTALEnergies Petrochemicals LLC

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

Revision	Revision	Unit/Group Process				
No.	Code	New Unit	ID No.	Applicable Form	NSR Authorization	Description of Changes and Provisional Terms and Conditions
16	MS-C	No	N-12	OP-2 OP-UA6 OP-UA5	36644, PSDTX903M5, N007M1	Add 40 CFR 63 Subpart DDDDD detailed rules to N-12 for compliance with 63 Subpart DDDDD.
17	MS-C	No	N-13	OP-2 OP-UA6 OP-UA5	36644, PSDTX903M5, N007M1	Add 40 CFR 63 Subpart DDDDD detailed rules to N-13 for compliance with 63 Subpart DDDDD.
18	SIG-B	No	TK-2501B	OP-2 OP-REQ2	106.262/11/01/2003, 106.478/09/04/2000	Add negative 40 CFR Part 60, Subpart Kb applicability.
19	SIG-B	No	TK-2501	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Add negative 40 CFR Part 60, Subpart Kb applicability.
20	MS-C	No	X-8502	OP-2	36644, PSDTX903M5, N007M1	Remove scenarios associated with SOP Index No. 60A-1 and 60A-2
21	MS-C	Yes	T270596	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORGSV. Unit ID T270596 has the same regulatory applicability as GRPINORGSV.
22	MS-C	Yes	TK-7401	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORGSV. Unit ID TK-7401 has the same regulatory applicability as GRPINORGSV.
23	MS-C	Yes	TK-7601	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORGSV. Unit ID TK-7601 has the same regulatory applicability as GRPINORGSV.
24	MS-C	Yes	TK-2493	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORGSV. Unit ID TK-2493 has the same regulatory applicability as GRPINORGSV.
25	MS-C	Yes	TK-2491	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORGSV. Unit ID TK-2491 has the same regulatory applicability as GRPINORGSV.
26	MS-C	Yes	TK-9604	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORGSV. Unit ID TK-9604 has the same regulatory applicability as GRPINORGSV.
27	MS-C	Yes	TK-9801	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORGSV. Unit ID TK-9801 has the same regulatory applicability as GRPINORGSV.
28	MS-C	Yes	TK-5273	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPSV1K. Unit ID TK-5273 has the same regulatory applicability as GRPSV1K.
29	MS-C	Yes	TK-5273X	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPSV1K. Unit ID TK-5273X has the same regulatory applicability as GRPSV1K.
30	MS-C	Yes	TK-5510	OP-2 OP-SUMR	36644, PSDTX903M5, N007M1	Add storage vessel to GRPSV1K. Unit ID TK-5510 has the same regulatory applicability as GRPSV1K.
31	MS-C	Yes	T233674	OP-2 OP-SUMR	106.371/09/04/2000	Add storage vessel to GRPSV1K. Unit ID T233674 has the same regulatory applicability as GRPSV1K.
32	MS-C	Yes	T233676	OP-2 OP-SUMR	106.371/09/04/2000	Add storage vessel to GRPSV1K. Unit ID T233676 has the same regulatory applicability as GRPSV1K.
33	MS-C	Yes	T113596	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPSV1K. Unit ID T131632 has the same regulatory applicability as GRPSV1K.
34	MS-C	Yes	T131632	OP-2 OP-SUMR	106.371/09/04/2000	Add storage vessel to GRPSV1K. Unit ID T131632 has the same regulatory applicability as GRPSV1K.

Date:	09/30/2024
Permit No:	0-2551
Regulated Entity No.:	100216977
Company Name :	BASF TOTALEnergies Petrochemicals LLC

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

Revision	Revision		Unit/Group Pro	cess		
No.	Code	New Unit	ID No.	Applicable Form	NSR Authorization	Description of Changes and Provisional Terms and Conditions
35	MS-C	Yes	T280047	OP-2 OP-SUMR	106.371/09/04/2000	Add storage vessel to GRPSV1K. Unit ID T280047 has the same regulatory applicabilit as GRPSV1K.
36	SIG-B	Yes	TK-1501	OP-2 OP-SUMR OP-UA3 OP-REQ2	106.472/09/04/2000	Add TK-1501 to Title V permit as submitted via Op-Notify on 07/08/2015 (Project No. 23146). Add negative 40 CFR Part 60, Subpart Kb applicability.
37	SIG-B	Yes	TK-2210	OP-2 OP-SUMR OP-UA3 OP-REQ2	36644, PSDTX903M5, N007M1	Add storage vessel. Provide unit attribute information on Form OP-UA3. Add negativ 40 CFR Part 60, Subpart Kb applicability.
38	SIG-B	Yes	ТК-2620	OP-2 OP-SUMR OP-UA3 OP-REQ2	106.472/09/04/2000	Add storage vessel. Provide unit attribute information on Form OP-UA3. Add negati 40 CFR Part 60, Subpart Kb applicability.
39	SIG-B	Yes	ТК-4020	OP-2 OP-SUMR OP-UA3 OP-REQ2	106.472/09/04/2000	Add storage vessel. Provide unit attribute information on Form OP-UA3. Add negati 40 CFR Part 60, Subpart Kb applicability.
40	SIG-B	Yes	T241176	OP-2 OP-SUMR OP-UA3 OP-REQ2	106.472/09/04/2000	Add storage vessel. Provide unit attribute information on Form OP-UA3. Add negati 40 CFR Part 60, Subpart Kb applicability.
41	ADMIN-A	No	GRPSV1K	OP-2 OP-REQ2		Update negative NSPS Kb language to current language. Negative applicability for M YY and Chapter 115 remain the same.
42	ADMIN-A	No	D-8001R	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Update negative NSPS Kb language to current language.
43	ADMIN-A	No	DSL-TK	OP-2 OP-REQ2	106.473/09/04/2000	Update negative NSPS Kb language to current language.
44	ADMIN-A	No	TK-2210X	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Update negative NSPS Kb language to current language.
45	ADMIN-A	No	TK-3110X	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Update negative NSPS Kb language to current language.
46	ADMIN-A	No	TK-3710X	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Update negative NSPS Kb language to current language.

This form is for use by facilities subject to air quality permit requirements and

may be revised periodically. (Title V revised 03/10)

Date:	09/30/2024
Permit No:	0-2551
Regulated Entity No.:	100216977
Company Name :	BASF TOTALEnergies Petrochemicals LLC

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

Revision	Revision	Unit/Group Process				
No.	Code	New Unit	ID No.	Applicable Form	NSR Authorization	Description of Changes and Provisional Terms and Conditions
47	ADMIN-A	Νο	TK-7403X	OP-2	36644, PSDTX903M5, N007M1	Update negative NSPS Kb language to current language.
47	ADIVIIN-A	NO	11-74037	OP-REQ2	30044, P3D1X903103, 10071011	opuare negative NSFS to language to current language.
48	ADMIN-A	No	TK-9603X	OP-2	36644, PSDTX903M5, N007M1	Update negative NSPS Kb language to current language.
40	ADIVIIN-A	NO	11-50037	OP-REQ2	50044, F3DTX505W3, N007W1	opuate negative ivses to language to current language.

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

Date	Permit No.	Regulated Entity No.
9/30/2024	O-2551	100216977

	Revision	Unit/Group/Process		Potentially Applicable	Negative	Negative Applicability/Superseded Requirement
Unit AI	No.	ID No.	Applicable Form	Regulatory Name	Applicability/Superseded Requirement Citation	Reason
А	9	T-5702	OP-2 OP-REQ2	NSPS NNN		Group 1 process vent subject to 40 CFR Part 63, Subpart G and 40 CFR Part 60, Subpart NNN, must comply with 40 CFR, Part 63, Subpart G. Process Vent subject to MACT YY and NSPS NNN are required to comply- with process vent requirements of MACT YY
A	10	R-2501X	OP-2 OP-REQ2	NSPS RRR	60.700(a)	The source does not produce any products listed in NSPS RRR. In addition, this source is not a process vent, but rather a wastewater treatment vent subject to 40 CFR 63, Part YY as it is part of Unit ID HONWWTP.
A	18	TK-2501B	OP-2 OP-REQ2	NSPS Kb	660 1100(n)	This source has a capacity greater than 39,890 gallons (151 m ³) and stores a liquid with a maximum true vapor pressure less than 0.5 psia (3.5 kPa).
A	19	TK-2501	OP-2 OP-REQ2	NSPS Kb	960 1100(0)	This source has a capacity greater than 39,890 gallons (151 m ³) and stores a liquid with a maximum true vapor pressure less than 0.5 psia (3.5 kPa).
A	35	T280047	OP 2 OP SUMR	NSPS Kb	5 60.110b(a)	This source has a capacity of less than 19,800 gallons (75 m3).
A	36	TK-1501	OP-2 OP-SUMR OP-UA3 OP-REQ2	NSPS Kb	§60.110b(a)	This source has a capacity of less than 19,800 gallons (75 m^3).
A	37	ТК-2210	OP-2 OP-SUMR OP-UA3 OP-REQ2	NSPS Kb	§60.110b(a)	This source has a capacity of less than 19,800 gallons (75 m^3).

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

Date	Permit No.	Regulated Entity No.
9/30/2024	O-2551	100216977

	Revision No.	Unit/Group/Process		Potentially Applicable	Negative	Negative Applicability/Superseded Requirement
Unit AI		ID No.	Applicable Form	Regulatory Name	Applicability/Superseded Requirement Citation	Reason
A	38	TK-2620	OP-2 OP-SUMR OP-UA3 OP-REQ2	NSPS Kb	§60.110b(a)	This source has a capacity of less than 19,800 gallons (75 m ³).
A	39	ТК-4020	OP-2 OP-SUMR OP-UA3 OP-REQ2	NSPS Kb	§60.110b(a)	This source has a capacity of less than 19,800 gallons (75 m ³).
A	40	T241176	OP-2 OP-SUMR OP-UA3 OP-REQ2	NSPS Kb	§60.110b(a)	This source has a capacity of less than 19,800 gallons (75 m ³).
D	41	GRPSV1K	OP-2 OP-REQ2	NSPS Kb	§60.110b(a)	Capacity of storage vessel is less than 10,600 gallons.
A	41	GRPSV1K	OP-2 OP-REQ2	NSPS Kb	§60.110b(a)	The storage vessels have a capacity of less than 19,800 gallons (75 m3).
D	42	D-8001R	OP-2 OP-REQ2	NSPS Kb	§60.110b(a)	Capacity of storage vessel is less than 10,600 gallons.
A	42	D-8001R	OP-2 OP-REQ2	NSPS Kb	§60.110b(a)	The storage vessel has a capacity of less than 19,800 gallons (75 m3).
D	43	DSL-TK	OP-2 OP-REQ2	NSPS Kb	§60.110b(a)	Capacity of storage vessel is less than 10,600 gallons.
A	43	DSL-TK	OP-2 OP-REQ2	NSPS Kb	§60.110b(a)	The storage vessel has a capacity of less than 19,800 gallons (75 m3).
D	44	TK-2210X	OP-2 OP-REQ2	NSPS Kb	§60.110b(a)	Capacity of storage vessel is less than 10,600 gallons.
his form for use	44 -ID156v2.0, Revised 07 by facilities subject to a riodically (Title V Releas	ir quality permit requirements and	OP-2 able/Superseded Requirement Determinations	NSPS Kb	§60.110b(a)	The storage vessel has a capacity of less than 19,800 gallons (75 m3).

may be revised periodically (Title V Release 10/07)

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

Date	Permit No.	Regulated Entity No.
9/30/2024	O-2551	100216977

	Revision No.	Unit/Group/Process		Potentially Applicable	Negative	Negative Applicability/Superseded Requirement
Unit AI		ID No.	Applicable Form	Regulatory Name	Applicability/Superseded Requirement Citation	Reason
D	45	TK-3110X	OP-2	NSPS Kb	§60.110b(a)	Capacity of storage vessel is less than 10,600 gallons.
U	45	TK-3110X	OP-REQ2	NSP3 KU	900.110b(a)	capacity of storage vesser is less than 10,000 ganons.
•	45	7/ 21402	OP-2		SC0 110b/a)	The starses used has a constitute flags then 10,000 cellars (75 m2)
A	45	TK-3110X	OP-REQ2	NSPS Kb	§60.110b(a)	The storage vessel has a capacity of less than 19,800 gallons (75 m3).
			OP-2		§60.110b(a)	Capacity of storage vessel is less than 10,600 gallons.
D	46	ТК-3710Х	OP-REQ2	NSPS Kb		
		TK-3710X	OP-2	NSPS Kb	§60.110b(a)	The storage vessel has a capacity of less than 19,800 gallons (75 m3).
A	46		OP-REQ2			
		17 TK-7403X	OP-2	NSPS Kb	§60.110b(a)	Capacity of storage vessel is less than 10,600 gallons.
D	47		OP-REQ2			
		47 TK-7403X	OP-2			
A	47		OP-REQ2	NSPS Kb	§60.110b(a)	The storage vessel has a capacity of less than 19,800 gallons (75 m3).
		48 TK-9603X	OP-2	NSPS Kb	§60.110b(a)	Capacity of storage vessel is less than 10,600 gallons.
D	48		OP-REQ2			
A			OP-2			
	48	TK-9603X	OP-REQ2	NSPS Kb	§60.110b(a)	The storage vessel has a capacity of less than 19,800 gallons (75 m3).

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: (X Mr. Ars. Mrs. Dr.)				
Technical Contact Full Name: Jacob Benfield				
Technical Contact Title: Sr. Environmental & Sustainability Specialist				
Employer Name: BASF Corporation				
Mailing Address: P.O. Box 2506				
City: Port Arthur				
State: TX				
ZIP Code: 77643				
Territory:				
Country: USA				
Foreign Postal Code:				
Internal Mail Code:				
Telephone No.: 915-433-8774				
Fax No.:				
Email: jacob.benfield@basf.com				
VIII. Reference Only Requirements (For reference only.)				
A. State Senator: Senator Robert Nichols (District 3)				
B. State Representative: Rep. Manuel Christian (District 22)				
C. Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)?				
D. Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? \Box YES \boxtimes NO				
E. Indicate the alternate language(s) in which public notice is required:				

From: Kyle Murray <<u>Kyle.Murray@tceq.texas.gov</u>>
Sent: Monday, September 9, 2024 2:50 PM
To: Jacob Benfield <<u>jacob.benfield@basf.com</u>>
Subject: [EXT] Working Draft Permit -- FOP O2551/Project 36831, BASF TOTALEnergies Petrochemicals,
LLC

Good afternoon Mr. Benfield,

I have conducted a technical review of the renewal application for BASF TOTALEnergies Petrochemicals, LLC. 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 by **Wednesday, October 9th.**

In addition, upon further evaluation of your federal operating permit application, we have identified some potential discrepancies that need to be addressed to finalize the permit. Please submit responses to the following items in concurrence with your WDP comments.

1. Form OP-REQ1, Pages 85-86 – Question XII.B.1 was checked "Yes" indicating that a standard permit is used in the permit area. XII.B.2 was checked "Yes" indicating it was the pollution control project standard permit under 30 TAC 116.617. However, there are no active standard permit registrations listed in our NSR database for this site. Please remove the answers for XII.B.2-B.16, correct XII.B.1 to "No", and submit corrected pages. If you believe there is a standard permit in use, please provide an explanation and the standard permit registration number.

2. Form OP-REQ1, Page 87

- a. NSR permit 36644 was listed in section XII.G, NSR Authorizations with FCAA \$112(g) Requirements. This pertains to NSR permits that have case-by-case MACT requirements since a MACT has not been promulgated for the necessary source category. If the NSR permit does not contain that type of requirement, then it should be listed in section XII.H instead (since that addresses the remainder of 30 TAC Chapter 116 permits). Please confirm the proper section and submit a corrected page if needed.
- b. AMOC 220 was listed in section XII.H. AMOCs are not authorizations that should be listed on this form. Please remove AMOC 220 and submit a corrected page.

3. Form OP-PBRSUP – Table B | Form OP-REQ1 – Page 88

- a. PBRs 106.227/09/04/2000, 106.511/09/04/2000, 106.532/09/04/2000 are listed in Table B of the OP-PBRSUP and are also required to be listed on Page 88 of the OP-REQ1. Please update and redate the OP-REQ1 and provide me with a copy of the corrected page.
- 4. Form OP-UA5 | Unit IDs N-12 & N-13 Prior to the completion of our rule analysis for MACT DDDDD, these two units were entered on OP-UA5 in our database as a placeholder. I have added requirements based on the OP-UA6 in the application. Please verify whether units N-12 and N-13 are process heaters or boilers as defined by MACT DDDDD. If they are process heaters, please fill out the MACT DDDDD tables on OP-UA5 instead. If they are boilers, no further updates are needed.
- 5. NSPS Kb Negative Applicability for Unit ID T280047 For Revision No. 35 on the OP-2, Unit ID T280047 was requested to be added to GRPSV1K. However, this unit is listed on the OP-REQ2 with a negative applicability reason for 40 CFR Part 60, Subpart Kb of "This source has a capacity of less than 19,800 gallons (75 m³)". GRPSV1K already has an existing permit shield for NSPS Kb with a reason of "Capacity of storage vessel is less than 10,600 gallons." Since every group member must have identical information, please confirm if the NSPS Kb reason should be updated to the newer language and also confirm that the other two existing permit shields should be retained by the group. Instead of listing T280047 on OP-REQ2, please list GRPSV1K with all desired permit shields and provide the updated form.
- 6. NSPS NNN Negative Applicability for Unit ID T-5702 The negative applicability reason for NSPS NNN cites rule overlap with MACT G and with MACT YY. While it is not as common for multiple MACTs to apply to the same source, the shield has

been tentatively granted. However, the existing permit only has MACT G requirements for this unit. Please confirm if MACT YY is needed as well by listing it on OP-UA1. Or, if only MACT G applies, please revise the negative applicability reason on the OP-REQ2 and provide the updated form.

- 7. NSPS RRR Negative Applicability for Unit ID R-2501X A permit shield was requested for NSPS RRR since it does not produce products listed in NSPS RRR and is not a process vent but is a wastewater treatment vent subject to MACT YY (part of unit ID HONWWTP). NSPS RRR is not potentially applicable to a wastewater vent, and permit shields are only granted for potentially applicable rules (for example, if R-2501X was a reactor process vent in chemical production but just not the specified chemicals, a permit shield could be granted). Therefore, the permit shield has not been added. Please note this does not add any requirements. Let me know if you have questions.
- 8. Form OP-UA58 Unit ID T-8201 There are discrepancies in the existing answer codes on Table 3c of OP-UA58 for MACT G. Please provide an updated OP-UA58 form with the corrections below, re-dated.
 - a. The form instructions indicate that Performance Tests should not be answered if the Control Device Type code is "FLARE". Please remove the answer for Performance Tests.
 - b. Please provide an answer for the Continuous Monitoring question. The form instructions do not mention that units with a Control Device Type code of "FLARE" should also answer this, but that is an error. This information is needed.
- 9. Unit IDs N-15 & N-15A For the new operating scenarios incorporating the recently approved AMOC for 30 TAC Chapter 115, Vent Gas Control, additional monitoring is required since the applicable citations do not include adequate monitoring or recordkeeping requirements. Please provide an OP-MON form identifying periodic monitoring for Unit ID N-15, Index No. R5121-AMOC and for Unit N-15A, Index No. R5121-AMOC.
- **10. Major NSR Summary Table** Please review the table for NSR 36644/PSDTX903M5/N007M1 and mark any updates needed based on the 08/10/2023 action.

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 <u>R6AirPermitsTX@epa.gov</u> and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at <u>Where to Submit FOP</u> <u>Applications and Permit-Related Documents</u>.

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,

Kyle J. Murray

Permit Reviewer OA/Air Permits Division/OP Section Texas Commission on Environmental Quality MC 163, P.O. Box 13087 Austin, TX 78711-3087 kyle.murray@tceq.texas.gov

Phone: (512) 239-1279 Fax: (512) 239-1400

> How are we doing? Fill out our online customer satisfaction survey at <u>www.tceq.texas.gov/customersurvey</u>

From:	John B Lycan <john.lycan@basf.com></john.lycan@basf.com>
Sent:	Friday, July 19, 2024 2:24 AM
То:	Kyle Murray
Cc:	Nina Hendrickx; Angela R Hodgkinson
Subject:	Re: [EXT] FW: Technical Review FOP O2551/Project No. 36831, BASF
	TOTALEnergies Petrochemicals LLC, Ethylene/Propylene Cracker and
	Cogeneration

Hi Kyle,

Not sure what happened with Nina email, I am CC ing her in this note. Darren Lanthier has elected to take another position outside the company. Angela can make sure the right people are involved.

Thank you for reaching out.

John

From: Kyle Murray <<u>Kyle.Murray@tceq.texas.gov</u>>
Sent: Thursday, July 18, 2024 6:28 PM
To: John B Lycan <<u>john.lycan@basf.com</u>>
Subject: [EXT] FW: Technical Review -- FOP O2551/Project No. 36831, BASF TOTALEnergies
Petrochemicals LLC, Ethylene/Propylene Cracker and Cogeneration

You don't often get email from kyle.murray@tceq.texas.gov. Learn why this is important

Good morning Mr. Lycan,

I have been assigned to this FOP renewal application and have started the technical review process. I reached out to the DAR on file, Nina Hendrickx - <u>nina.hendrickx@basf.com</u>, and the technical contact listed in the application, Darren Lanthier - <u>darren.lanthier@basf.com</u>, and had both emails bounce back. Are these still valid contacts or is there a newly designated technical contact I can communicate with for this project?

Sincerely,

Kyle J. Murray

Permit Reviewer OA/Air Permits Division/OP Section Texas Commission on Environmental Quality MC 163, P.O. Box 13087 Austin, TX 78711-3087 kyle.murray@tceq.texas.gov Phone: (512) 239-1279 Fax: (512) 239-1400



How are we doing? Fill out our online customer satisfaction survey at <u>www.tceq.texas.gov/customersurvey</u>

From: Kyle Murray
Sent: Thursday, July 18, 2024 11:07 AM
To: <u>nina.hendrikx@basf.com</u>; <u>BTPEnvironmental@basf.com</u>
Subject: FW: Technical Review -- FOP 02551/Project No. 36831, BASF TOTALEnergies Petrochemicals LLC, Ethylene/Propylene Cracker and Cogeneration

Good morning,

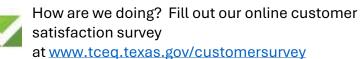
I reached out to the technical contact, Darren Lanthier / <u>darren.lanthier@basf.com</u>, listed on this project application and had the email bounce back. Is Mr. Lanthier still a valid contact or has a new technical contact been designated for this project?

Sincerely,

Kyle J. Murray

Permit Reviewer OA/Air Permits Division/OP Section Texas Commission on Environmental Quality MC 163, P.O. Box 13087 Austin, TX 78711-3087 kyle.murray@tceq.texas.gov

Phone: (512) 239-1279 Fax: (512) 239-1400



From: Kyle Murray Sent: Thursday, July 18, 2024 8:48 AM

To: darren.lanthier@basf.com

Subject: Technical Review -- FOP O2551/Project No. 36831, BASF TOTALEnergies Petrochemicals LLC, Ethylene/Propylene Cracker and Cogeneration

Good morning Mr. Lanthier,

I have been assigned to the Federal Operating Permit (FOP) renewal application of Permit No. O2551 for BASF TOTALEnergies Petrochemicals LLC, NAFTA Regional Olefins Complex, Ethylene / Propylene Cracker and Cogeneration. This application has been assigned Project No. 36831. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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 <u>R6AirPermitsTX@epa.gov</u> and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at <u>Where to Submit FOP</u> <u>Applications and Permit-Related Documents</u>.

Optional: Request any information that may have been noted as deficient or out-of-date during a preliminary project review (e.g. OP-1 with current contact data, current OP-REQ1, etc.), and include a deadline.

Please review the "SOP Technical Review Fact Sheet" located

at <u>http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title V/sop wdp fac</u> <u>tsheet.pdf</u>. This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit. Thank you for your cooperation. Sincerely,

Kyle J. Murray

Permit Reviewer **OA/Air Permits Division/OP Section** Texas Commission on Environmental Quality MC 163, P.O. Box 13087 Austin, TX 78711-3087 kyle.murray@tceq.texas.gov

Phone: (512) 239-1279 (512) 239-1400 Fax:



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

From:	Jacob Benfield <jacob.benfield@basf.com></jacob.benfield@basf.com>
Sent:	Thursday, July 18, 2024 1:24 PM
То:	Kyle Murray; nina.hendrikx@basf.com
Subject:	RE: [EXT] FW: Technical Review FOP O2551/Project No. 36831, BASF
	TOTALEnergies Petrochemicals LLC, Ethylene/Propylene Cracker and
	Cogeneration

Kyle,

Darren is no longer with us. You can contact me.

Jacob Benfield, P.E. Sr. Environmental & Sustainability Specialist

Mobile: +1.915.433.8774, Email: <u>jacob.benfield@basf.com</u> or <u>btpenvironmental@basf.com</u> Postal Address: BASF TotalEngeries Petrochemicals LLC, P.O. Box 2506, Port Arthur, TX 77643, USA



We create chemistry

BASF Corporation

- We take ownership of our safety culture.
- We share and implement best practices.
- We are empowered to stop

From: Kyle Murray <Kyle.Murray@tceq.texas.gov>
Sent: Thursday, July 18, 2024 11:07 AM
To: nina.hendrikx@basf.com; BTPEnvironmental <BTPEnvironmental@basf.com>
Subject: [EXT] FW: Technical Review -- FOP O2551/Project No. 36831, BASF TOTALEnergies
Petrochemicals LLC, Ethylene/Propylene Cracker and Cogeneration

You don't often get email from kyle.murray@tceq.texas.gov. Learn why this is important

Good morning,

I reached out to the technical contact, Darren Lanthier / <u>darren.lanthier@basf.com</u>, listed on this project application and had the email bounce back. Is Mr. Lanthier still a valid contact or has a new technical contact been designated for this project?

Sincerely,

Kyle J. Murray

Permit Reviewer OA/Air Permits Division/OP Section Texas Commission on Environmental Quality MC 163, P.O. Box 13087 Austin, TX 78711-3087 kyle.murray@tceq.texas.gov

Phone: (512) 239-1279 Fax: (512) 239-1400

> How are we doing? Fill out our online customer satisfaction survey at <u>www.tceq.texas.gov/customersurvey</u>

From: Kyle Murray
Sent: Thursday, July 18, 2024 8:48 AM
To: darren.lanthier@basf.com
Subject: Technical Review -- FOP 02551/Project No. 36831, BASF TOTALEnergies Petrochemicals LLC, Ethylene/Propylene Cracker and Cogeneration

Good morning Mr. Lanthier,

I have been assigned to the Federal Operating Permit (FOP) renewal application of Permit No. O2551 for BASF TOTALEnergies Petrochemicals LLC, NAFTA Regional Olefins Complex, Ethylene / Propylene Cracker and Cogeneration. This application has been assigned Project No. 36831. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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 <u>R6AirPermitsTX@epa.gov</u> and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at <u>Where to Submit FOP</u> <u>Applications and Permit-Related Documents</u>.

Optional: Request any information that may have been noted as deficient or out-of-date during a preliminary project review (e.g. OP-1 with current contact data, current OP-REQ1, etc.), and include a deadline.

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

Thank you for your cooperation.

Sincerely,

Kyle J. Murray

Permit Reviewer OA/Air Permits Division/OP Section Texas Commission on Environmental Quality MC 163, P.O. Box 13087 Austin, TX 78711-3087 kyle.murray@tceq.texas.gov Phone: (512) 239-1279 Fax: (512) 239-1400

> How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

Jon Niermann, *Chairman* Bobby Janecka, *Commissioner* Catarina R. Gonzales, *Commissioner* Kelly Keel, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 3, 2024

THE HONORABLE ROBERT NICHOLS TEXAS SENATE PO BOX 12068 AUSTIN TX 78711-2068

Re: Accepted Federal Operating Permit Renewal Application Project Number: 36831 Permit Number: 02551 BASF TOTALEnergies Petrochemicals LLC Ethylene / Propylene Cracker And Cogeneration Port Arthur, Jefferson County Regulated Entity Number: RN100216977 Customer Reference Number: CN604166967

Dear Senator Nichols:

This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) renewal 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=-93.885,29.952777&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.

P.O. Box 13087 • Austin, Texas 78711-3087 • 512-239-1000 • tceq.texas.gov

The Honorable Robert Nichols Page 2 July 3, 2024

Re: Accepted Federal Operating Permit Renewal 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

Jon Niermann, *Chairman* Bobby Janecka, *Commissioner* Catarina R. Gonzales, *Commissioner* Kelly Keel, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 3, 2024

THE HONORABLE CHRISTIAN MANUEL TEXAS HOUSE OF REPRESENTATIVES PO BOX 2910 AUSTIN TX 78768-2910

Re: Accepted Federal Operating Permit Renewal Application Project Number: 36831 Permit Number: 02551 BASF TOTALEnergies Petrochemicals LLC Ethylene / Propylene Cracker And Cogeneration Port Arthur, Jefferson County Regulated Entity Number: RN100216977 Customer Reference Number: CN604166967

Dear Representative Manuel:

This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) renewal 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=-93.885,29.952777&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.

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

P.O. Box 13087 • Austin, Texas 78711-3087 • 512-239-1000 • tceq.texas.gov

Texas Commission on Environmental Quality

Title V Existing

2551

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	ETHYLENE / PROPYLENE CRACKER AND COGENERATION
Does the site have a physical address?	No
Because there is no physical address, describe how to locate this site:	Gate 99, Intersection of Hwy 73 and Hwy 366
City	Port Arthur
State	ТХ
ZIP	77643
County	JEFFERSON
Latitude (N) (##.#####)	29.952777
Longitude (W) (-###.######)	93.885
Primary SIC Code	2869
Secondary SIC Code	
Primary NAICS Code	325110
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN100216977
What is the name of the Regulated Entity (RE)?	BASF TOTAL FINA NAFTA REGION OLEFINS COMPLEX
Does the RE site have a physical address?	No
Because there is no physical address, describe how to locate this site:	ON SH 366 GATE 99 AT INTX N HIGHWAY 366 & HIGHWAY 73
City	PORT ARTHUR
State	ТХ
ZIP	77642
County	JEFFERSON
Latitude (N) (##.#####)	29.903888
Longitude (W) (-###.#######)	-94.055
Facility NAICS Code	
What is the primary business of this entity?	PETROCHEMICAL MANUFACTURING PLANT

Customer (Applicant) Information

How is this applicant associated with this site? What is the applicant's Customer Number (CN)? Type of Customer Full legal name of the applicant: Legal Name Texas SOS Filing Number Federal Tax ID State Franchise Tax ID State Sales Tax ID Owner Operator CN604166967

Corporation

Basf Totalenergies Petrochemicals Llc 801691640 223620488 12236204884

78499192
251-500
Yes

Responsible Official Contact

Person TCEQ should contact for questions about this application: **Organization Name** BASF TOTALENERGIES PETROCHEMICALS LLC Prefix MR First JOHN Middle Last LYCAN Suffix Credentials VICE PRESIDENT PORT ARTHUR SITE Title Enter new address or copy one from list: Mailing Address Domestic Address Type Mailing Address (include Suite or Bldg. here, if PO BOX 2506 applicable) Routing (such as Mail Code, Dept., or Attn:) City PORT ARTHUR State ТΧ ZIP 77643 Phone (###-####) 4099605224 Extension Alternate Phone (###-#####) Fax (###-###-####) 4099601750 E-mail john.lycan@basf.com

Technical Contact

Person TCEQ should contact for questions about this application: Select existing TC contact or enter a new contact. **Organization Name** Prefix First Middle Last Suffix Credentials Title Enter new address or copy one from list: Mailing Address Address Type Mailing Address (include Suite or Bldg. here, if

New Contact

BASF TOTALEnergies Petrochemicals LLC MR Darren Keith Lanthier

Environmental Specialist Responsible Official Contact

Domestic PO BOX 2506

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	29 Deg 57 Min 10 Sec
3) Permit Longitude Coordinate:	93 Deg 53 Min 6 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?	Renewal
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) 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

PORT ARTHUR TX 77643 4099193492 4099605033

BTPEnvironmental@basf.com

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.

 [File Properties]

 File Name
 <a href=/ePermitsExternal/faces/file?</td>

 fileId=178651>BTP TV Renewal and Revision

 Application.pdf

 Hash
 07D92BEFCCAC1619390F59BBF70F39874B035F78C4D923A33B48EF6697AC398D

 MIME-Type
 application/pdf

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

Expedite Title V

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

Certification

I certify that I am the Responsible Official 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 John Lycan, the owner of the STEERS account ER075915.
- 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.

No

- 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 enforcement 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 2551.
- 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: John Lycan OWNER OPERATOR

Account Number:	ER075915
Signature IP Address:	130.41.172.186
Signature Date:	2024-01-18
Signature Hash:	8B49C0B1E92A4B2BDCCECBBBBF5B90FB66C166A46F785936829EDAF1B9B98B7E
Form Hash Code at time of Signature:	5D9A65B6EA51DEB6FFD97E869015D76F78F41D1EB4ACE218202019244EA8C1B1

Submission

Reference Number: Submitted by:

Submitted Timestamp:

Submitted From:

Confirmation Number: Steers Version: Permit Number:

Additional Information

The application reference number is 617603

The application was submitted by ER075915/John Lycan

The application was submitted on 2024-01-18 at 12:59:33 CST

The application was submitted from IP address 130.41.172.186 $\,$

The confirmation number is 511137

The STEERS version is 6.73

The permit number is 2551

Application Creator: This account was created by David C Smalley

BASF TotalEnergies Petrochemicals LLC

A Joint Venture of



January 17, 2024

SUMBITTED VIA STEERS

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

Subject: Title V Permit O2551 Renewal/Revision Application BASF TOTALEnergies Petrochemicals LLC NAFTA Regional Olefins Complex Port Arthur, Jefferson County RN100216977, CN604166967

Dear Mr Chacon:

BASF TOTALEnergies Petrochemicals LLC (BTP) is submitting the attached application for the renewal/revision of Federal Operating Permit O2551, which authorizes the operation of the BTP NAFTA Regional Olefins Complex located in Port Arthur, Jefferson County, Texas.

If there are any questions related to this submittal, please contact Darren Lanthier at (409) 919-3492 or via e-mail at BTPEnvironmental@basf.com.

Sincerely. John Lycan

Vice President, Port Arthur Site BASF TOTALEnergies Petrochemicals, LLC

CC: Sarah Kirksey, TCEQ Region 10, Air Section Manager R6AirPermitsTX@epa.gov

Enclosures

P.O. Box 2506, Port Arthur, Texas 77643 (409) 960-5000

Application for Renewal and Revision of Federal Operating Permit No. O2551

BASF TotalEnergies Petrochemical LLC

A Joint Venture of





NAFTA Regional Olefins Complex P.O. Box 2506 Port Arthur, TX 77643

Customer Number: CN604166967 Regulated Entity Number: RN100216977 TCEQ Account Number: JE-0843-F



January 2024

TABLE OF CONTENTS

I.	Intr	oduction	1
II.	Des	cription of Changes	2
III.	Adn	ninistrative Forms	3
	1.	OP-CRO1: Certification by Responsible Official	4
	2.	OP-ACPS: Application Compliance Plan and Schedule	5
	3.	OP-1: Site Information Summary	6
	4.	OP-2: Application for Permit Revision/Renewal	13
	5.	OP-SUMR: Individual Unit Summary for Revisions	19
IV.	Uni	t Attribute Forms	24
	1.	OP-UA3: Storage Tank/Vessel Attributes	25
	2.	OP-UA6: Boiler/Steam Generator/Steam Generating Unit Attributes	27
	3.	OP-UA15: Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes	
V.	Арр	blicability Forms	30
	1.	OP-REQ1: Application Area-wide Applicability Determinations and General Information	31
	2.	OP-REQ2: Negative Applicable Requirement Determinations	.119
VI.	New	v Source Review Form	.121
	1.	OP-PBRSUP: Permit By Rule Supplemental Table	.122

Appendix - TCEQ Approval of Alternative Method of Control (AMOC) No. 220

I. Introduction

BASF TOTALEnergies Petrochemicals LLC (BTP) operates the BTP Ethylene/Propylene Cracker and Cogeneration facility in Port Arthur, Texas. Operation of the Ethylene/Propylene Cracker and Cogeneration facility is authorized by Federal Operating Permit (FOP) No. O-2551, which was initially issued on November 3, 2004, and was last renewed on July 25, 2019. Two subsequent revisions were approved on January 27, 2021 (Project 30530) and February 22, 2022 (Project 32745).

The purpose of this Title V permit application is for the Renewal and Revision of Permit Number O-2551. BTP is submitting the renewal application prior to the January 25, 2024, deadline for FOP O-2551 which will expire on July 25, 2024. In addition, BTP is also submitting a revision application for this permit.

II. Description of Changes

Revision 1 – Form OP-REQ1 has been updated since the last revision of FOP No. O-2551. Therefore, the most recent version of this form has been provided per TCEQ guidance.

Revision 2 – Form OP-PBRSUP is being submitted for the first time, per TCEQ guidance.

Revision 3 – Permit 36644 was altered on June 14, 2023, and is to be included in FOP No. O-2551.

Revision 4 – An Alternative Method of Control (AMOC) Plan, AMOC No. 220 was approved by the TCEQ on April 28, 2023, and is to be included in FOP No. O-2551.

Revisions 5 and 6 – Adds a new scenario for N-15 and N-15A as it relates to AMOC No. 220.

Revisions 7 and 8 – Omits Group 1 MACT G requirements for HONWWTP and T-8201 as the sources are subject to sitewide only MACT G requirements.

Revision 9 – Removes NSPS NNN requirements for T-5702 as source is subject to MACT G and MACT YY. Negative applicability for NSPS NNN is being added.

Revisions 10 – Removes NSPS RRR requirements for R-2501X as it does not produce a product listed under NSPS RRR and it is not considered a process vent. Negative applicability for NSPS RRR is being added.

Revisions 11 and 12 – Updates Unit IDs to coincide with facility records.

Revisions 13 through 17 – Form OP-UA6 is provided to add detailed rules to sources subject to 40 CFR 63, Subpart DDDDD.

Revisions 18 and 19 – Form OP-REQ2 is provided to add negative applicability to NSPS Kb to sources.

Revision 20 – Removes scenarios associated with X-8502.

Revisions 21 through 27 – Adds sources to GRPINORGSV.

Revisions 28 through 35 – Adds sources to GRPSV1K.

Revisions 36 through 40 – Form OP-UA3 is provided to add tanks to FOP O-2551. OP-REQ2 is provided to add negative applicability to NSPS Kb.

III. Administrative Forms

The following Administrative Forms are included in this application:

- 1. OP-CRO1: CERTIFICATION BY RESPONSIBLE OFFICIAL
- 2. OP-ACPS: APPLICATION COMPLIANCE PLAN AND SCHEDULE
- 3. OP-1: SITE INFORMATION SUMMARY
- 4. OP-2: APPLICATION FOR PERMIT REVISION/RENEWAL
- 5. OP-SUMR: INDIVIDUAL UNIT SUMMARY FOR REVISIONS

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.

N: 604166967 nd	Project No.:	Account No.: JE-0843-F		
nd	Project No.:			
nd				
	Company Name: BA	Company Name: BASF TOTALEnergies Petrochemicals LLC		
appropriate b	nox)			
	Duly Authorize	ed Representative		
propriate box,) (Only one response	can be accepted per form)		
Updat	e to Permit Application	on		
🛛 Permit	Revision, Renewal,	or Reopening		
This certification does not extend to information which is designated by the TCEQ as information for reference only. I, John Lycan certify that I am the RO (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).				
	to			
Date		End Date		
ate 2	Date 3 Date	4 Date 5 Date 6		
ger	Signa	ature Date: <u>Jan 17, 2024</u>		
	appropriate box, propriate box, Update Permit rmation which rmed after rea low, are true, a ific Date(s). Date	appropriate box) Duly Authoriz propriate box) (Only one response Update to Permit Applicati Permit Revision, Renewal, Treation which is designated by the certify that I feed) Treed after reasonable inquiry, the solution date (s). rmed after reasonable inquiry, the solution date (s). to Date Date 2 Date 3 Date 2		

TCEQ-10009 (APDG 5836v6, Revised 08/18) OP-CRO1 This form is for use by facilities subject to air quality permit requirements and may be revised periodically. (Title V Release 08/18)

Texas Commission on Environmental Quality Form OP-ACPS Application Compliance Plan and Schedule

Date: 01/17/2024	Regulated Entity No.: 100216	977	Permit No.: O-2551
Company Name: BASF TotalEnergies Petrochemical		Area Na Cogene	

- Part 1 of this form must be submitted with all initial FOP applications and renewal applications.
- The Responsible Official must use Form OP-CRO1 (Certification by Responsible Official) to certify information contained in this form in accordance with 30 TAC § 122.132(d)(8).

Part 1

А.	Compliance Plan — Future Activity Committal Statement		
As th appli	The <i>Responsible Official</i> commits, utilizing reasonable effort, to the following: As the responsible official it is my intent that all emission units shall continue to be in compliance with all applicable requirements they are currently in compliance with, and all emission units shall be in compliance by the compliance dates with any applicable requirements that become effective during the permit term.		
В.	Compliance Certification - Statement for Units in Compliance* (Indicate response by entering an "X" in the appropriate column)		
1.	With the exception of those emission units listed in the Compliance Schedule section of this form (Part 2, below), and based, at minimum, on the compliance method specified in the associated applicable requirements, are all emission units addressed in this application in compliance with all their respective applicable requirements as identified in this application?	🛛 YES 🗌 NO	
2.	Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	🗌 YES 🖾 NO	
3.	If the response to Item B.2, above, is "Yes," indicate the total number of Part 2 attachments included in this submittal. <i>(For reference only)</i>		
*	For Site Operating Permits (SOPs), the complete application should be consulted for ap requirements and their corresponding emission units when assessing compliance status For General Operating Permits (GOPs), the application documentation, particularly For should be consulted as well as the requirements contained in the appropriate General F 30 TAC Chapter 122.	s. m OP-REQ1	
	Compliance should be assessed based, at a minimum, on the required monitoring, test keeping, and/or reporting requirements, as appropriate, associated with the applicable i question.	•	

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: BASF TOTALEnergies Petrochemicals LLC
B .	Customer Reference Number (CN): CN 604166967
C.	Submittal Date (mm/dd/yyyy): 01/17/2024
II.	Site Information
A.	Site Name: NAFTA Regional Olefins Complex
B .	Regulated Entity Reference Number (RN): RN100216977
C.	Indicate affected state(s) required to review permit application: (Check the appropriate box[es].)
A	$R \square CO \square KS \square LA \square NM \square OK \square N/A$
D.	Indicate all pollutants for which the site is a major source based on the site's potential to emit: <i>(Check the appropriate box[es].)</i>
×ν	$OC \qquad \boxtimes NO_X \qquad \square SO_2 \qquad \boxtimes PM_{10} \qquad \boxtimes CO \qquad \square Pb \qquad \boxtimes HAPS$
Other	r: GHG
E.	Is the site a non-major source subject to the Federal Operating Permit Program?
F.	Is the site within a local program area jurisdiction? \Box YES \boxtimes NO
G.	Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63?
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)
$\boxtimes S$	ite 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.)	?	
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		
ROl	Name Prefix: (X Mr. Mrs. Ms. Dr.)		
RO I	Full Name: John Lycan		
RO 1	Title: Vice President Port Arthur Site Manager		
Emp	loyer Name: BASF Corporation		
Mail	ing Address: P.O. Box 2506		
City	City: Port Arthur		
State	: Texas		
ZIP	ZIP Code: 77643-2506		
Terri	Territory:		
Cour	ntry: USA		
Fore	ign Postal Code:		
Inter	nal Mail Code:		
Tele	phone No.: 409-960-5224		
Fax 1	No.: 409-960-1750		
Ema	il: john.lycan@basf.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: (X Mr. Arr. Mrs. Mrs. Dr.)
Technical Contact Full Name: Darren Lanthier
Technical Contact Title: Environmental
Employer Name: BASF Corporation
Mailing Address: P.O. Box 2506
City: Port Arthur
State: TX
ZIP Code: 77643
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 409-919-3492
Fax No.:
Email: darren.lanthier@basf.com
VIII. Reference Only Requirements (For reference only.)
A. State Senator: Senator Robert Nichols (District 3)
B. State Representative: Rep. Manuel Christian (District 22)
C. Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)?
D. Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? \Box YES \boxtimes NO
E. Indicate the alternate language(s) in which public notice is required:

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 C	Code:
Territ	tory:
Coun	try:
Forei	gn Postal Code:
C.	Physical Location:
D.	Contact Name Prefix: (Mr. Mrs. Ms. Dr.)
Conta	act Full Name:
Е.	Telephone No.:
X.	Application Area Information
A.	Area Name: Ethylene / Propylene Cracker and Cogeneration
B.	Physical Address: Intersection of Hwy 73 and Hwy 366, Gate 99
City:	Port Arthur
State:	: TX
ZIP C	Code: 77642
C.	Physical Location: Intersection of Hwy 73 and Hwy 366, Gate 99
D.	Nearest City: Port Arthur
Е.	State: TX
F.	ZIP Code: 77643

TCEQ 10002 (APD ID 251v1, revised 09/23) OP-1 This form is for use by sources subject to air quality permit requirements and may be revised periodically.

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

X.	Application Area Information <i>(continued)</i>					
G.	Latitude (nearest second): 29° 57' 10"					
H.	Longitude (nearest second): 93° 53' 6"					
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?					
J.	Indicate the estimated number of emission units in the application area: 97 from NSR authorization references					
K.	Are there any emission units in the application area subject to the Acid Rain Program?					
XI.	Public Notice (Complete this section for SOP Applications and Acid Rain Permit Applications only.)					
А.	Name of a public place to view application and draft permit: Port Arthur Public Library					
B.	Physical Address: 4615 9 th Avenue					
City:	Port Arthur					
ZIP C	Code: 77642					
C.	Contact Person (Someone who will answer questions from the public during the public notice period):					
Conta	act Name Prefix: (X Mr. Ars. Mrs. Ms. Dr.):					
Conta	Contact Person Full Name: Darren Lanthier					
Conta	Contact Mailing Address: P.O. Box 2506					
City:	City: Port Arthur					
State:	ate: TX					
ZIP C	ZIP Code: 77643					
Territory:						
Country: USA						
Forei	Foreign Postal Code:					
Interr	al Mail Code:					
Telep	hone No.: 409-919-3492					

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:

Federal Operating Permit Program Site Information Summary Form OP-1 (Page 7) Texas Commission on Environmental Quality

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: 01/17/2024						
Permit No.: O-2551						
Regulated Entity No.: RN100216977						
Company Name: BASF TOTALEnergies Petrochemicals LLC						
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	X Renewal					
Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)						
Significant Revision	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].)							
⊠ vo	DC	\boxtimes NO _X	\Box SO ₂	$\square PM_{10}$	🖂 CO	D Pb	🖂 HAP	
Other:	GHG							
IV.	Reference On	ly Requirements	(For reference only)					
Has tl	Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)? XES 🗌 NO 🗌 N/A							
V.	7. Delinquent Fees and Penalties							
		1	sed until all delinquent with the Delinquent Fea	1	wed to the TCEQ or the	e Office of the Attorne	y General on behalf	

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

Date:	01/17/2024
Permit No:	0-2551
Regulated Entity No.:	100216977
Company Name :	BASF TOTALEnergies Petrochemicals LLC

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

Revision	Revision	Unit/Group Process				
No.	Code	New Unit	ID No.	Applicable Form	NSR Authorization	Description of Changes and Provisional Terms and Conditions
1	MS-C	No	N/A	OP-REQ1	N/A	Provide updated Form OP-REQ1.
2	MS-C	No	See OP-PBRSUP	See OP-PBRSUP	See OP-PBRSUP	Submittal of OP-PBRSUP
3	MS-C	No	N/A		36644	Incorporate the Permit 36644 alteration dated June 14, 2023, into the Title V operation permit.
4	ADMIN-G	No	N/A		36644	Incorporate the Alternative Method of Control (AMOC) Plan, AMOC No. 220 dated April 28, 2023, into the Title V operation permit.
5	MS-C	No	N-15	OP-2 UA-15	36644, PSDTX903M5, N007M1	Add new scenario for existing process vents N-15 and N-15A and add 30 TAC Chapter 115 applicability for sending a process vent stream to a flare that requires a recently approved AMOC.
6	MS-C	No	N-15A	OP-2 UA-15	36644, PSDTX903M5, N007M1	Add new scenario for existing process vents N-15 and N-15A and add 30 TAC Chapter 115 applicability for sending a process vent stream to a flare that requires a recently approved AMOC.
7	MS-C	No	HONWWTP	OP-2	36644, PSDTX903M5, N007M1	Omit Group 1 MACT G wastewater requirements. The source is subject to site-wide only MACT G requirements. (Source is Group 2.)
8	MS-C	No	T-8201	OP-2	36644, PSDTX903M5, N007M1	Omit Group 1 MACT G wastewater requirements. The source is subject to site-wide only MACT G requirements. (Source is Group 2.)
9	SIG-B	No	T-5702	OP-2	36644, PSDTX903M5, N007M1	Omit NSPS NNN requirements. The source is subject to 40 CFR Part 63, Subpart G and 40 CFR Part 63, Subpart YY.
				OP-REQ2		Add negative applicability to 40 CFR Part 60, Subpart NNN.
10	SIG-B	No	R-2501X	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Omit NSPS RRR requirements. The reactor does not produce any products listed in NSPS RRR and is not considered a process vent. The source is a part of Unit ID HONWWTP which is a wastewater treatment system that is subject to 40 CFR Part 63, Subpart YY and 40 CFR Part 63, Subpart G.
						Add negative applicability for 40 CFR Part 60, Subpart RRR.
11	ADMIN-A	No	TK-9601R	OP-2	36644, PSDTX903M5, N007M1	Update Unit ID to coincide with facility records. Replace Unit ID TK-9601 with TK- 9601R.
12	ADMIN-A	No	D-3730X	OP-2	36644, PSDTX903M5, N007M1	Update Unit ID to coincide with facility records. Replace Unit ID D-3780X with D- 3730X.
13	MS-C	No	B-7240	OP-2 OP-UA6	36644, PSDTX903M5, N007M1	Add 40 CFR 63 Subpart DDDDD detailed rules to B-7240 for compliance with 63 Subpart DDDDD.
14	MS-C	No	B-7280	OP-2 OP-UA6	36644, GHGPSDTX3, PSDTX903M5, N007M1	Add 40 CFR 63 Subpart DDDDD detailed rules to B-7280 for compliance with 63 Subpart DDDDD.
15	MS-C	No	B-7290	OP-2 OP-UA6	36644, GHGPSDTX3, PSDTX903M5, N007M1	Add 40 CFR 63 Subpart DDDDD detailed rules to B-7290 for compliance with 63 Subpart DDDDD.

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

Date:	01/17/2024
Permit No:	0-2551
Regulated Entity No.:	100216977
Company Name :	BASF TOTALEnergies Petrochemicals LLC

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

Revision	Revision	Unit/Group Process				
No.	Code	New Unit	ID No.	Applicable Form	NSR Authorization	Description of Changes and Provisional Terms and Conditions
16	MS-C	No	N-12	OP-2 OP-UA6	36644, PSDTX903M5, N007M1	Add 40 CFR 63 Subpart DDDDD detailed rules to N-12 for compliance with 63 Subpart DDDDD.
17	MS-C	No	N-13	OP-2 OP-UA6	36644, PSDTX903M5, N007M1	Add 40 CFR 63 Subpart DDDDD detailed rules to N-13 for compliance with 63 Subpart DDDDD.
18	SIG-B	No	TK-2501B	OP-2 OP-REQ2	106.262/11/01/2003, 106.478/09/04/2000	Add negative 40 CFR Part 60, Subpart Kb applicability.
19	SIG-B	No	TK-2501	OP-2 OP-REQ2	36644, PSDTX903M5, N007M1	Add negative 40 CFR Part 60, Subpart Kb applicability.
20	MS-C	No	X-8502	OP-2	36644, PSDTX903M5, N007M1	Remove scenarios associated with SOP Index No. 60A-1 and 60A-2
21	MS-C	Yes	T270596	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORGSV. Unit ID T270596 has the same regulatory applicability as GRPINORGSV.
22	MS-C	Yes	TK-7401	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORGSV. Unit ID TK-7401 has the same regulatory applicability as GRPINORGSV.
23	MS-C	Yes	TK-7601	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORGSV. Unit ID TK-7601 has the same regulatory applicability as GRPINORGSV.
24	MS-C	Yes	TK-2493	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORGSV. Unit ID TK-2493 has the same regulatory applicability as GRPINORGSV.
25	MS-C	Yes	TK-2491	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORGSV. Unit ID TK-2491 has the same regulatory applicability as GRPINORGSV.
26	MS-C	Yes	TK-9604	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORGSV. Unit ID TK-9604 has the same regulatory applicability as GRPINORGSV.
27	MS-C	Yes	TK-9801	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPINORGSV. Unit ID TK-9801 has the same regulatory applicability as GRPINORGSV.
28	MS-C	Yes	TK-5273	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPSV1K. Unit ID TK-5273 has the same regulatory applicability as GRPSV1K.
29	MS-C	Yes	TK-5273X	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPSV1K. Unit ID TK-5273X has the same regulatory applicability as GRPSV1K.
30	MS-C	Yes	TK-5510	OP-2 OP-SUMR	36644, PSDTX903M5, N007M1	Add storage vessel to GRPSV1K. Unit ID TK-5510 has the same regulatory applicability as GRPSV1K.
31	MS-C	Yes	T233674	OP-2 OP-SUMR	106.371/09/04/2000	Add storage vessel to GRPSV1K. Unit ID T233674 has the same regulatory applicability as GRPSV1K.
32	MS-C	Yes	T233676	OP-2 OP-SUMR	106.371/09/04/2000	Add storage vessel to GRPSV1K. Unit ID T233676 has the same regulatory applicability as GRPSV1K.
33	MS-C	Yes	T113596	OP-2 OP-SUMR	106.472/09/04/2000	Add storage vessel to GRPSV1K. Unit ID T131632 has the same regulatory applicability as GRPSV1K.
34	MS-C	Yes	T131632	OP-2 OP-SUMR	106.371/09/04/2000	Add storage vessel to GRPSV1K. Unit ID T131632 has the same regulatory applicability as GRPSV1K.

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

Date:	01/17/2024
Permit No:	0-2551
Regulated Entity No.:	100216977
Company Name :	BASF TOTALEnergies Petrochemicals LLC

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

Revision	Revision		Unit/Group Proc	ess		
No.	Code	New Unit	ID No.	Applicable Form	NSR Authorization	Description of Changes and Provisional Terms and Conditions
35	MS-C	Yes	T280047	OP-2 OP-SUMR	106.371/09/04/2000	Add storage vessel to GRPSV1K. Unit ID T280047 has the same regulatory applicability as GRPSV1K.
36	SIG-B	Yes	ТК-1501	OP-2 OP-SUMR OP-UA3 OP-REQ2	106.472/09/04/2000	Add TK-1501 to Title V permit as submitted via Op-Notify on 07/08/2015 (Project No. 23146). Add negative 40 CFR Part 60, Subpart Kb applicability.
37	SIG-B	Yes	ТК-2210	OP-2 OP-SUMR OP-UA3 OP-REQ2	36644, PSDTX903M5, N007M1	Add storage vessel. Provide unit attribute information on Form OP-UA3. Add negative 40 CFR Part 60, Subpart Kb applicability.
38	SIG-B	Yes	ТК-2620	OP-2 OP-SUMR OP-UA3 OP-REQ2	106.472/09/04/2000	Add storage vessel. Provide unit attribute information on Form OP-UA3. Add negative 40 CFR Part 60, Subpart Kb applicability.
39	SIG-B	Yes	ТК-4020	OP-2 OP-SUMR OP-UA3 OP-REQ2	106.472/09/04/2000	Add storage vessel. Provide unit attribute information on Form OP-UA3. Add negative 40 CFR Part 60, Subpart Kb applicability.
40	SIG-B	Yes	T241176	OP-2 OP-SUMR OP-UA3 OP-REQ2	106.472/09/04/2000	Add storage vessel. Provide unit attribute information on Form OP-UA3. Add negative 40 CFR Part 60, Subpart Kb applicability.

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

Date	:	01/17/2024						
Pern	nit No:	0-2551						
Regu	ilated Entity No.:	100216977	100216977					
Com	pany Name :	BASF TOTALEnergies Petrochemicals LLC						
I.	SIGNIFICANT	REVISION (Complete this section if you are submitting a significant revision application or a renew	val application that includes a significant revision.)					
А.	Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322?							
B.	Indicate the alternate language(s) in which public notice is required:							
C.	C. Will there be a change in air pollutant emissions as a result of the significant revision?							

Date:	Permit No.	Regulated Entity No.	
01/17/2024	O-2551	100216977	

Unit /	Unit / Process		Unit/P	rocess		Preconstruction Auth	Preconstruction Authorizations	
Process AI	Revision No.	ID No.	Applicable Form	Name/ Description	САМ	30 TAC Chapter 116/30 TAC Chapter 106	Title I	
А	21	T270596	OP-2 OP-SUMR	Optisperse HP7414 Tank		106.472/09/04/2000		
А	22	TK-7401	OP-2 OP-SUMR	Potable Water Tank		106.472/09/04/2000		
А	23	TK-7601	OP-2 OP-SUMR	Potable Water Head Tank		106.472/09/04/2000		
А	24	TK-2493	OP-2 OP-SUMR	20Y15 Antifoulant Tank		106.472/09/04/2000		
А	25	TK-2491	OP-2 OP-SUMR	20Y15 Antifoulant Tank		106.472/09/04/2000		
А	26	TK-9604	OP-2 OP-SUMR	Phosphate Injection Tank		106.472/09/04/2000		
А	27	TK-9801	OP-2 OP-SUMR	C4 Clarified Water Tank		106.472/09/04/2000		
А	28	TK-5273	OP-2 OP-SUMR	Antifoam Agent Porta-Feed		106.472/09/04/2000		
А	29	TK-5273X	OP-2 OP-SUMR	Antifoam Agent Porta-Feed		106.472/09/04/2000		
A	30	TK-5510	OP-2 OP-SUMR	Lube Oil Reservoir		36644	PSDTX903M5, N007M1	

Date:	Permit No.	Regulated Entity No.	
01/17/2024	O-2551	100216977	

Unit /	Unit / Process		Unit/P	rocess		Preconstruction Auth	orizations
Process AI	Revision No.	ID No.	Applicable Form	Name/ Description	CAM	30 TAC Chapter 116/ 30 TAC Chapter 106	Title I
A	31	T233674	OP-2 OP-SUMR	20Y114 Antifoulant Tank		106.371/09/04/2000	
А	32	T233676	OP-2 OP-SUMR	20Y14 Tank		106.371/09/04/2000	
А	33	T113596	OP-2 OP-SUMR	Petroflo 4H3 Tank		106.472/09/04/2000	
А	34	T131632	OP-2 OP-SUMR	Spectrus NX1100 Tank	Spectrus NX1100 Tank		
А	35	T280047	OP-2 OP-SUMR	CT Biodispersant Tank	CT Biodispersant Tank		
А	36	TK-1501	OP-2 OP-SUMR OP-UA3 OP-REQ2	Chemical Injection Tank		106.472/09/04/2000	
А	37	TK-2210	OP-2 OP-SUMR OP-UA3 OP-REQ2	Lube Oil Reservoir		36644	PSDTX903M5, N007M1

Date:	Permit No.	Regulated Entity No.	
01/17/2024	O-2551	100216977	

Unit /	Unit / Process		Unit/P	rocess		Preconstruction Author	orizations
Process AI	Revision No.	ID No.	Applicable Form	Name/ Description	CAM	30 TAC Chapter 116/ 30 TAC Chapter 106	Title I
AI						TAC Chapter 100	
А	38	TK-2620	OP-2 OP-SUMR OP-UA3	20Y104 Poly Inhibitor Tank		106.472/09/04/2000	
			OP-REQ2				
А	39	TK-4020	OP-2 OP-SUMR OP-UA3	20Y104 Poly Inhibitor Tank		106.472/09/04/2000	
			OP-REQ2				
А	40	T241176	OP-2 OP-SUMR OP-UA3	20Y120 Poly Inhibitor Tank, 20%		106.472/09/04/2000	
			OP-REQ2				

Date	Permit No.	Regulated Entity No.
1/17/2024	O-2551	100216977

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.
21	T270596	OP-2 OP-SUMR	A	GRPINORGSV
22	TK-7401	OP-2 OP-SUMR	A	GRPINORGSV
23	TK-7601	OP-2 OP-SUMR	A	GRPINORGSV
24	TK-2493	OP-2 OP-SUMR	A	GRPINORGSV
25	TK-2491	OP-2 OP-SUMR	A	GRPINORGSV
26	TK-9604	OP-2 OP-SUMR	A	GRPINORGSV
27	TK-9801	OP-2 OP-SUMR	A	GRPINORGSV

Date	Permit No.	Regulated Entity No.
1/17/2024	O-2551	100216977

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.
28	TK-5273	OP-2 OP-SUMR	A	GRPSV1K
29	ТК-5273Х	OP-2 OP-SUMR	A	GRPSV1K
30	TK-5510	OP-2 OP-SUMR	A	GRPSV1K
31	T233674	OP-2 OP-SUMR	A	GRPSV1K
32	T233676	OP-2 OP-SUMR	A	GRPSV1K
33	T113596	OP-2 OP-SUMR	A	GRPSV1K
34	T131632	OP-2 OP-SUMR	A	GRPSV1K
35	T280047	OP-2 OP-SUMR	A	GRPSV1K

IV. Unit Attribute Forms

The following unit attribute forms are included in this section:

- 1. OP-UA3: STORAGE TANK/VESSEL ATTRIBUTES
- 2. OP-UA6: BOILER/STEAM GENERATOR/STEAM GENERATING UNIT ATTRIBUTES
- 3. OP-UA15: EMISSION POINT/STATIONARY VENT/DISTILLATION OPERATION VENT/PROCESS VENT ATTRIBUTES

Storage Tank/Vessel Attributes Form OP-UA3 (Page 4) Federal Operating Permit Program Table 4a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115) Subchapter B: Storage of Volatile Organic Compounds (VOCs) Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.	
01/17/2024	0-2551	RN-100216977	

Unit ID No.	SOP/GOP Index No.	Alternate Control Requirement	ACR ID No.	Product Stored	Storage Capacity	Throughput	Potential to Emit	Uncontrolled Emissions
TK-1501	R5112	No		VOC1	A1K-25K			
TK-2210	R5112	No		VOC1	A1K-25K			
TK-2620	R5112	No		VOC1	A1K-25K			
TK-4020	R5112	No		VOC1	A1K-25K			
T241176	R5112	No		VOC1	A1K-25K			

Storage Tank/Vessel Attributes Form OP-UA3 (Page 5) Federal Operating Permit Program Table 4b: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115) Subchapter B: Storage of Volatile Organic Compounds (VOCs) Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.	
01/17/2024	0-2551	RN-100216977	

Unit ID No.	SOP/GOP Index No.	Construction Date	Tank Description	True Vapor Pressure	Primary Seal	Secondary Seal	Control Device Type	Control Device ID No.
TK-1501	R5112		NONE1	1-				
TK-2210	R5112		NONE1	1-				
TK-2620	R5112		NONE1	1-				
TK-4020	R5112		NONE1	1-				
T241176	R5112		NONE1	1-				

Boiler/Steam Generator/Steam Generating Unit Attributes Form OP-UA6 (Page 37) Federal Operating Permit Program Table 14a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63) Subpart DDDDD: Industrial, Commercial, and Institutional Boilers Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.	
01/17/2024	O-2551	RN100216977	

Unit ID No.	SOP/GOP Index No.	Commence	Table Applicability	HCl Emission	HCI-CMS
B-7240	63DDDDD	EXIST	T3.3G1		
B-7280	63DDDDD	EXIST	T3.3G1		
B-7290	63DDDDD	EXIST	T3.3G1		
N-12	63DDDDD	EXIST	T3.3G1		
N-13	63DDDDD	EXIST	T3.3G1		

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes Form OP-UA15 (Page 3) Federal Operating Permit Program Table 2a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115) Subchapter B: Vent Gas Control Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.	
01/17/2024	0-2551	RN100216977	

Emission Point ID No.	SOP/GOP Index No.	Chapter 115 Division	Combustion Exhaust	Vent Type	Total Uncontrolled VOC Weight	Combined 24-Hour VOC Weight	VOC Concentration	VOC Concentration or Emission Rate at Maximum Operating Conditions
N-15	R5121-AMOC	NO	NO	REGVAPPL				NO
N-15A	R5121-AMOC	NO	NO	REGVAPPL				NO

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes Form OP-UA15 (Page 4) Federal Operating Permit Program Table 2b: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115) Subchapter B: Vent Gas Control Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
01/17/2024	0-2551	RN100216977

Emission Point ID No.	SOP Index No.	Alternate Control Requirement	ACR ID No.	Control Device Type	Control Device ID No.
N-15	R5121-AMOC	ALTED	AMOC No. 220		
N-15A	R5121-AMOC	ALTED	AMOC No. 220		

V. Applicability Forms

The following applicability forms are included in this section:

- 1. OP-REQ1: APPLICATION AREA-WIDE APPLICABILITY DETERMINATIONS AND GENERAL INFORMATION
- 2. OP-REQ2: NEGATIVE APPLICABLE REQUIREMENT DETERMINATIONS

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	Form OP-REQ1: Page 1							
I.	Title	30 T A	AC Chapter 111 - Control of Air Pollution from Visible Emissions and Particu	late Matt	er			
	А.	Visik						
•		1.	The application area includes stationary vents constructed on or before January 31, 1972.	YES	NO			
•		2.	The application area includes stationary vents constructed after January 31, 1972.	XYES	NO			
			<i>If the responses to Questions I.A.1 and I.A.2 are both "NO," go to Question I.A.6.</i> <i>If the response to Question I.A.1 is "NO" and the response to Question I.A.2 is "YES," go to Question I.A.4.</i>					
•		3.	The application area is opting to comply with the requirements for stationary vents constructed after January 31, 1972 for vents in the application area constructed on or before January 31, 1972.	YES	NO			
٠		4.	All stationary vents are addressed on a unit specific basis.	YES	NO			
•		5.	Test Method 9 (40 CFR Part 60, Appendix A, Method 9 - Visual Determination of the Opacity of Emissions from Stationary Sources) is used to determine opacity of emissions in the application area.	YES	NO			
٠		6.	The application area includes structures subject to 30 TAC § 111.111(a)(7)(A).	YES	×NO			
•		7.	The application area includes sources, other than those specified in 30 TAC § 111.111(a)(1), (4), or (7), subject to 30 TAC § 111.111(a)(8)(A).	YES	XNO			
•		8.	Emissions from units in the application area include contributions from uncombined water.	XYES	NO			
•		9.	The application area is located in the City of El Paso, including Fort Bliss Military Reservation, and includes solid fuel heating devices subject to 30 TAC § 111.111(c).	YES	⊠NO □N/A			

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

For	m OP-	REQ	1: Pag	re 2		
I.		e 30 T Itinue		hapter 111 - Control of Air Pollution from Visible Emissions and Particu	late Matt	ter
	B.	Mat	terials	Handling, Construction, Roads, Streets, Alleys, and Parking Lots		
		1.	Item	as a - d determines applicability of any of these requirements based on geogra	phical loc	ation.
٠			a.	The application area is located within the City of El Paso.	YES	XNO
•			b.	The application area is located within the Fort Bliss Military Reservation, except areas specified in 30 TAC § 111.141.	YES	XNO
•			c.	The application area is located in the portion of Harris County inside the loop formed by Beltway 8.	YES	XNO
•			d.	The application area is located in the area of Nueces County outlined in Group II state implementation plan (SIP) for inhalable particulate matter adopted by the TCEQ on May 13, 1988.	YES	XNO
			a - d. If al	l responses		
		2.	Item	as a - d determine the specific applicability of these requirements.		
٠			a.	The application area is subject to 30 TAC § 111.143.	YES	NO
٠			b.	The application area is subject to 30 TAC § 111.145.	YES	NO
٠			c.	The application area is subject to 30 TAC § 111.147.	YES	NO
٠			d.	The application area is subject to 30 TAC § 111.149.	YES	NO
	C.	Emi	issions	E Limits on Nonagricultural Processes	1	
•		1.		application area includes a nonagricultural process subject to 30 TAC 1.151.	XYES	NO
		 The application area includes a vent from a nonagricultural process that is subject to additional monitoring requirements. If the response to Question I.C.2 is "NO," go to Question I.C.4. 				XNO
		3.		vents from nonagricultural process in the application area are subject to tional monitoring requirements.	YES	NO

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	Form OP-REQ1: Page 3						
I.		Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter (continued)					
	C.	Emissions Limits on Nonagricultural Processes (continued)					
		4.	The application area includes oil or gas fuel-fired steam generators subject to 30 TAC §§ 111.153(a) and 111.153(c).	YES	NO		
		5.	The application area includes oil or gas fuel-fired steam generators that are subject to additional monitoring requirements. <i>If the response to Question I.C.5 is "NO," go to Question I.C.7.</i>	YES	NO		
		6.	All oil or gas fuel-fired steam generators in the application area are subject to additional monitoring requirements.	YES	NO		
		7.	The application area includes solid fossil fuel-fired steam generators subject to 30 TAC §§ 111.153(a) and 111.153(b).	YES	XNO		
		8.	The application area includes solid fossil fuel-fired steam generators that are subject to additional monitoring requirements. <i>If the response to Question I.C.8 is "NO," go to Section I.D.</i>	YES	NO		
		9.	All solid fossil fuel-fired steam generators in the application area are subject to additional monitoring requirements.	YES	NO		
	D.	Emi	ssions Limits on Agricultural Processes				
		1.	The application area includes agricultural processes subject to 30 TAC § 111.171.	YES	XNO		
	Е.	Out	door Burning				
•		1.	Outdoor burning is conducted in the application area. If the response to Question I.E.1 is "NO," go to Section II.	XYES	NO		
•		2.	Fire training is conducted in the application area and subject to the exception provided in 30 TAC § 111.205.	YES	XNO		
•		3.	Fires for recreation, ceremony, cooking, and warmth are used in the application area and subject to the exception provided in 30 TAC § 111.207.	YES	NO		
•		4.	Disposal fires are used in the application area and subject to the exception provided in 30 TAC § 111.209.	YES	XNO		

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Fori	n OP-J	REQ1	Form OP-REQ1: Page 4					
I.	Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter (continued)							
	E. Outdoor Burning (continued)							
•		5.	Prescribed burning is used in the application area and subject to the exception provided in 30 TAC § 111.211.	YES	XNO			
•		6.	Hydrocarbon burning is used in the application area and subject to the exception provided in 30 TAC § 111.213.	YES	NO			
•		7.	The application area has received the TCEQ Executive Director approval of otherwise prohibited outdoor burning according to 30 TAC § 111.215.	YES	NO			
II.	Title	30 T	AC Chapter 112 - Control of Air Pollution from Sulfur Compounds					
	А.	Tem	porary Fuel Shortage Plan Requirements					
		1.	The application area includes units that are potentially subject to the temporary fuel shortage plan requirements of 30 TAC §§ 112.15 - 112.18.	YES	XNO			
III.	Title	30 T	AC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds					
	А.	App	licability					
•		1.	The application area is located in the Houston/Galveston/Brazoria area, Beaumont/Port Arthur area, Dallas/Fort Worth area, El Paso area, or a covered attainment county as defined by 30 TAC § 115.10. See instructions for inclusive counties. If the response to Question III.A.1 is "NO," go to Section IV.	YES	□NO			
	B. Storage of Volatile Organic Compounds							
•		1.	The application area includes storage tanks, reservoirs, or other containers capable of maintaining working pressure sufficient at all times to prevent any VOC vapor or gas loss to the atmosphere.	XYES	NO			

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

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

Form	Form OP-REQ1: Page 5						
III.	I. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)						
	C.	Indu					
		1.	The application area includes affected VOC wastewater streams of an affected source category, as defined in 30 TAC § 115.140. <i>If the response to Question III.C.1 is "NO" or "N/A," go to Section III.D.</i>	XYES	□NO □N/A		
		2.	The application area is located at a petroleum refinery in the Beaumont/Port Arthur or Houston/Galveston/Brazoria area. <i>If the response to Question III.C.2 is "YES" and the refinery is in the</i> <i>Beaumont/Port Arthur area, go to Section III.D.</i>	YES	NO		
	 3. The application area is complying with the provisions of 40 CFR Part 63, Subpart G, as an alternative to complying with this division (relating to Industrial Wastewater). If the response to Question III.C.3 is "YES," go to Section III.D. 		YES	NO			
		4.	The application area is located at a plant with an annual VOC loading in wastewater, as determined in accordance with 30 TAC § 115.148, less than or equal to 10 Mg (11.03 tons). If the response to Question III.C.4 is "YES," go to Section III.D.	YES	NO		
		5.	The application area includes wastewater drains, junction boxes, lift stations, or weirs that are subject to the control requirements of 30 TAC § 115.142(1).	YES	NO		
		6.	The application area includes wastewater drains, junction boxes, lift stations, or weirs that handle streams chosen for exemption under 30 TAC § 115.147(2).	X YES	NO		
		7.	The application area includes wastewater drains, junction boxes, lift stations, or weirs that have an executive director approved exemption under 30 TAC § 115.147(4).	YES	NO		
	D. Loading and Unloading of VOCs						
٠		1.	The application area includes VOC loading operations.	X YES	NO		
•		2.	The application area includes VOC transport vessel unloading operations. For GOP applications, if the responses to Questions III.D.1 - D.2 are "NO," go to Section III.E.	XYES .	□NO		

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

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

Form	Form OP-REQ1: Page 6					
III.	Title	30 T	AC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds	(continue	d)	
	D.	Load				
•		3.	Transfer operations at motor vehicle fuel dispensing facilities are the only VOC transfer operations conducted in the application area.	YES	NO	
	Е.	Filli	ng of Gasoline Storage Vessels (Stage I) for Motor Vehicle Fuel Dispensing Fac	cilities		
•		1.	The application area includes one or more motor vehicle fuel dispensing facilities and gasoline is transferred from a tank-truck tank into a stationary storage container. If the response to Question III.E.1 is "NO," go to Section III.F.	YES	⊠NO	
•		2.	Transfers to stationary storage containers used exclusively for the fueling of agricultural implements are the only transfer operations conducted at facilities in the application area.	YES	□NO	
•		3.	All transfers at facilities in the application area are made into stationary storage containers with internal floating roofs, external floating roofs, or their equivalent. If the response to Question III.E.2 and/or E.3 is "YES," go to Section III.F.	YES	NO	
•		4.	The application area is located in a covered attainment county as defined in 30 TAC § 115.10. <i>If the response to Question III.E.4 is "NO," go to Question III.E.9.</i>	YES	□NO	
•		5.	Stationary gasoline storage containers with a nominal capacity less than or equal to 1,000 gallons are located at the facility.	YES	NO	
•		6.	Stationary gasoline storage containers with a nominal capacity greater than 1,000 gallons are located at the facility.	YES	NO	
•		7.	At facilities located in covered attainment counties other than Bastrop, Bexar, Caldwell, Comal, Guadalupe, Hays, Travis, Williamson, or Wilson County, transfers are made to stationary storage tanks greater than 1000 gallons located at a facility which has dispensed less than 100,000 gallons of gasoline in a calendar month after October 31, 2014. <i>If the response to Question III.E.7 is "YES," go to Section III.F.</i>	YES	NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	Form OP-REQ1: Page 7						
III.	Title	Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)					
	E.	Fillir	ng of Gasoline Storage Vessels (Stage I) for Motor Vehicle Fuel Dispensing Fac	cilities (co	ntinued)		
•		8.	At facilities located in Bastrop, Bexar, Caldwell, Comal, Guadalupe, Hays, Travis, Williamson, or Wilson County, transfers are made to stationary storage tanks greater than 1000 gallons located at a facility which has dispensed no more than 25,000 gallons of gasoline in a calendar month after December 31, 2004. <i>If the response to Question III.E.8 is "YES," go to Section III.F.</i>	YES	NO		
•		9.	Transfers are made to stationary storage tanks located at a motor vehicle fuel dispensing facility which has dispensed no more than 10,000 gallons of gasoline in any calendar month after January 1, 1991 and for which construction began prior to November 15, 1992.	YES	NO		
•		10.	Transfers are made to stationary storage tanks located at a motor vehicle fuel dispensing facility which has dispensed more than 10,000 gallons of gasoline in any calendar month after January 1, 1991 and for which construction began prior to November 15, 1992.	YES	NO		
•		11.	Transfers are made to stationary storage tanks located at a motor vehicle fuel dispensing facility which commenced construction on or after November 15, 1992.	YES	NO		
•		12.	At facilities located in Ellis, Johnson, Kaufman, Parker, or Rockwall County, transfers are made to stationary storage tanks located at a facility which has dispensed at least 10,000 gallons of gasoline but less than 125,000 gallons of gasoline in a calendar month after April 30, 2005.	YES	NO		
	F. Control of VOC Leaks from Transport Vessels (Complete this section for GOP applications for GOPs 511, 512, 513 and 514 only)						
•		1.	Tank-truck tanks are filled with, or emptied of, gasoline at a facility that is subject to 30 TAC § $115.214(a)(1)(C)$ or $115.224(2)$ within the application area.	YES	□NO □N/A		

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	Form OP-REQ1: Page 8					
III.	Title	e 30 T.	AC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds	(continue	ed)	
	F. Control of VOC Leaks from Transport Vessels (Complete this section for GOP applications for GO 511, 512, 513 and 514 only) (continued)					
•		2.	Tank-truck tanks are filled with non-gasoline VOCs having a TVP greater than or equal to 0.5 psia under actual storage conditions at a facility subject to $30 \text{ TAC } $ 115.214(a)(1)(C) within the application area.	□ YES	□NO □N/A	
*		3.	Tank-truck tanks are filled with, or emptied of, gasoline at a facility that is subject to 30 TAC 115.214(b)(1)(C) or 115.224(2) within the application area.	YES	□NO □N/A	
	G.	Con	trol of Vehicle Refueling Emissions (Stage II) at Motor Vehicle Fuel Dispensing	g Facilitio	es	
•		1.	The application area includes one or more motor vehicle fuel dispensing facilities and gasoline is transferred from a stationary storage container into motor vehicle fuel tanks. <i>If the response to Question III.G.1 is "NO" or "N/A," go to Section III.H.</i>	YES	×NO N/A	
•		2.	The application area includes facilities that began construction on or after November 15, 1992 and prior to May 16, 2012.	YES	NO	
•		3.	The application area includes facilities that began construction prior to November 15, 1992. <i>If the responses to Questions III.G.2 and Question III.G.3 are both "NO," go to</i> <i>Section III.H.</i>	YES	NO	
•		4.	The application area includes only facilities that have a monthly throughput of less than 10,000 gallons of gasoline.	YES	NO	
•		5.	The decommissioning of all Stage II vapor recovery control equipment located in the application area has been completed and the decommissioning notice submitted.	YES	□NO □N/A	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	Form OP-REQ1: Page 9					
III.	Titl	itle 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)				
	H.	I. Control Of Reid Vapor Pressure (RVP) of Gasoline				
•		1.	The application area includes stationary tanks, reservoirs, or other containers holding gasoline that may ultimately be used in a motor vehicle in El Paso County. If the response to Question III.H.1 is "NO" or "N/A," go to Section III.I.	YES	□NO ⊠N/A	
•		2.	The application area includes stationary tanks, reservoirs, or other containers holding gasoline that will be used exclusively for the fueling of agricultural implements.	YES	□NO	
٠		3.	The application area includes a motor vehicle fuel dispensing facility.	YES	NO	
•		4.	The application area includes stationary tanks, reservoirs, or other containers holding gasoline and having a nominal capacity of 500 gallons or less.	YES	NO	
	I.	Proc	ess Unit Turnaround and Vacuum-Producing Systems in Petroleum Refineries	8		
		1.	The application area is located at a petroleum refinery.	YES	XNO	
	J.	Surface Coating Processes (Complete this section for GOP applications only.)				
•		1.	Surface coating operations (other than those performed on equipment located on- site and in-place) that meet the exemption specified in 30 TAC § 115.427(3)(A) or 115.427(7) are performed in the application area.	YES	□NO □N/A	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

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

Form	Form OP-REQ1: Page 10						
III.	Title	ele 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)					
	K.	Cutback Asphalt					
		1.	Conventional cutback asphalt containing VOC solvents for the paving of roadways, driveways, or parking lots, is used or specified for use in the application area by a state, municipal, or county agency. If the response to Question III.K.1 is "N/A," go to Section III.L.	YES	XNO N/A		
		2.	The use, application, sale, or offering for sale of conventional cutback asphalt containing VOC solvents for the paving of roadways, driveways, or parking lots occurs in the application area.	YES	□NO □N/A		
		3.	Asphalt emulsion is used or produced within the application area.	YES	NO		
		4.	The application area is using an alternate control requirement as specified in 30 TAC § 115.513. <i>If the response to Question III.K.4 is "NO," go to Section III.L.</i>	YES	□NO		
		5.	The application area uses, applies, sells, or offers for sale asphalt concrete, made with cutback asphalt, that meets the exemption specified in 30 TAC § 115.517(1).	YES	NO		
		6.	The application area uses, applies, sells, or offers for sale cutback asphalt that is used solely as a penetrating prime coat.	YES	NO		
		7.	The applicant using cutback asphalt is a state, municipal, or county agency.	YES	NO		
	L.	Dega	ssing of Storage Tanks, Transport Vessels and Marine Vessels				
•		1.	The application area includes degassing operations for stationary, marine, and/or transport vessels. If the response to Question III.L.1 is "NO" or "N/A," go to Section III.M.	X YES	□NO □N/A		
•		2.	Degassing of only ocean-going, self-propelled VOC marine vessels is performed in the application area. <i>If the response to Question III.L.2 is "YES," go to Section III.M.</i>	YES	⊠NO □N/A		

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	Form OP-REQ1: Page 11						
III.	. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)						
	L.	Dega	assing of Storage Tanks, Transport Vessels and Marine Vessels (continued)				
•		3.	Degassing of stationary VOC storage vessels with a nominal storage capacity of 1,000,000 gallons or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	YES	⊠NO □N/A		
•		4.	Degassing of stationary VOC storage vessels with a nominal storage capacity of 250,000 gallons or more, or a nominal storage capacity of 75,000 gallons and storing materials with a true vapor pressure greater than 2.6 psia, and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	YES	XNO N/A		
*		5.	Degassing of VOC transport vessels with a nominal storage capacity of 8,000 gallons or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	YES	XNO		
•		6.	Degassing of VOC marine vessels with a nominal storage capacity of 10,000 barrels (420,000 gallons) or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	YES	□NO ▼N/A		
*		7.	Degassing of VOC marine vessels with a nominal storage capacity of 10,000 barrels (420,000 gallons) and a vapor space partial pressure ≥ 0.5 psia that have sustained damage as specified in 30 TAC § 115.547(5) is performed in the application area.	YES	□NO ⊠N/A		
	M. Petroleum Dry Cleaning Systems						
		1.	The application area contains one or more petroleum dry cleaning facilities that use petroleum based solvents.	YES	□NO ▼N/A		

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	Form OP-REQ1: Page 12					
III.	Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)					
	N. Vent Gas Control (Highly-reactive volatile organic compounds (HRVOC)					
		1.	The application area includes one or more vent gas streams containing HRVOC.	YES	□NO ▼N/A	
		2.	The application area includes one or more flares that emit or have the potential to emit HRVOC. If the responses to Questions III.N.1 and III.N.2 are both "NO" or "N/A," go to Section III.O. If the response to Question III.N.1 is "YES," continue with Question III.N.3.	YES	□NO ▼N/A	
		3.	All vent streams in the application area that are routed to a flare contain less than 5.0% HRVOC by weight at all times.	YES	NO	
		4.	All vent streams in the application area that are not routed to a flare contain less than 100 ppmv HRVOC at all times. If the responses to Questions III.N.3 and III.N.4 are both "NO," go to Section III.O.	YES	NO	
		5.	The application area contains pressure relief valves that are not controlled by a flare.	YES	NO	
		6.	The application area has at least one vent stream which has no potential to emit HRVOC.	YES	NO	
		7.	The application area has vent streams from a source described in 30 TAC § 115.727(c)(3)(A) - (H).	YES	NO	
	0.	Cool	ing Tower Heat Exchange Systems (HRVOC)			
		1.	The application area includes one or more cooling tower heat exchange systems that emit or have the potential to emit HRVOC.	YES	□NO ⊠N/A	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

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

Form	Form OP-REQ1: Page 13						
IV.	Title 30 TAC Chapter 117 - Control of Air Pollution from Nitrogen Compounds						
	A.	Appl	icability				
•		1.	The application area is located in the Houston/Galveston/Brazoria, Beaumont/Port Arthur, or Dallas/Fort Worth Eight-Hour area. For SOP applications, if the response to Question IV.A.1 is "YES," complete Sections IV.B - IV.F and IV.H. For GOP applications for GOPs 511, 512, 513, or 514, if the response to Question IV.A.1 is "YES," go to Section IV.F. For GOP applications for GOP 517, if the response to Question IV.A.1 is "YES," complete Sections IV.C and IV.F. For GOP applications, if the response to Question IV.A.1 is "NO," go to Section VI.	ĭ¥YES	□NO		
		2.	The application area is located in Bexar, Comal, Ellis, Hays, or McLennan County and includes a cement kiln. <i>If the response to Question IV.A.2 is "YES," go to Question IV.H.1.</i>	YES	⊠ NO		
		3.	The application area includes a utility electric generator in an east or central Texas county. See instructions for a list of counties included. If the response to Question IV.A.3 is "YES," go to Question IV.G.1. If the responses to Questions IV.A.1 - 3 are all "NO," go to Question IV.H.1.	YES	NO		
	B.	Utilit	y Electric Generation in Ozone Nonattainment Areas				
		1.	The application area includes units specified in 30 TAC §§ 117.1000, 117.1200, or 117.1300. If the response to Question IV.B.1 is "NO," go to Question IV.C.1.	YES	⊠NO		
		2.	The application area is complying with a System Cap in 30 TAC §§ 117.1020 or 117.1220.	YES	□NO		

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	Form OP-REQ1: Page 14						
IV.	Title	30 T	AC Chapter 117 - Control of Air Pollution from Nitrogen Compounds (continu	ied)			
	C.	Commercial, Institutional, and Industrial Sources in Ozone Nonattainment Areas					
•		1.	The application area is located at a site subject to 30 TAC Chapter 117, Subchapter B and includes units specified in 30 TAC §§ 117.100, 117.300, or 117.400. For SOP applications, if the response to Question IV.C.1 is "NO," go to Question IV.D.1. For GOP applications for GOP 517, if the response to Question IV.C.1 is "NO," go to Section IV.F.	XYES 🛛	□NO		
•		2.	The application area is located at a site that was a major source of NO_X before November 15, 1992.	YES	⊠NO □N/A		
•		3.	The application area includes an electric generating facility required to comply with the System Cap in 30 TAC § 117.320.	YES	XNO		
	D.	Adip	bic Acid Manufacturing				
		1.	The application area is located at, or part of, an adipic acid production unit.	YES	⊠NO □N/A		
	E.	Nitri	ic Acid Manufacturing - Ozone Nonattainment Areas	•			
		1.	The application area is located at, or part of, a nitric acid production unit.	YES	⊠NO □N/A		
	F.		bustion Control at Minor Sources in Ozone Nonattainment Areas - Boilers, Pr Jonary Engines and Gas Turbines	cocess He	aters,		
•		1.	The application area is located at a site that is a minor source of NO _X in the Houston/Galveston/Brazoria or Dallas/Fort Worth Eight-Hour areas (except for Wise County). For SOP applications, if the response to Question IV.F.1 is "NO," go to Question IV.G.1. For GOP applications, if the response to Question IV.F.1 is "NO," go to Section VI.	YES	NO		
•		2.	The application area is located in the Houston/Galveston/Brazoria area and has units that qualify for an exemption under 30 TAC § 117.2003(a).	YES	NO		
•		3.	The application area is located in the Houston/Galveston/Brazoria area and has units that qualify for an exemption under 30 TAC § 117.2003(b).	YES	NO		

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-REQ1: Page 15					
IV.	V. Title 30 TAC Chapter 117 - Control of Air Pollution from Nitrogen Compounds (continued)				
	F. Combustion Control at Minor Sources in Ozone Nonattainment Areas - Boilers, Process Hea Stationary Engines and Gas Turbines (continued)				
•		4.	The application area is located in the Dallas/Fort Worth Eight-Hour area (except for Wise County) and has units that qualify for an exemption under 30 TAC § 117.2103.	YES NO	
•		5.	The application area has units subject to the emission specifications under 30 TAC §§ 117.2010 or 30 TAC § 117.2110.	YES NO	
		6.	The application area has a unit that has been approved for alternative case specific specifications (ACSS) in 30 TAC § 117.2025 or 30 TAC § 117.2125. <i>If the response to Question IV.F.6 is "NO," go to Section IV.G.</i>	UYES NO	
		7.	An ACSS for carbon monoxide (CO) has been approved?	□YES □NO	
		8.	An ACSS for ammonia (NH ₃) has been approved?	UYES NO	
		9.	Provide the Permit Number(s) and authorization/issuance date(s) of the NSR proje incorporates an ACSS below.	ect(s) that	
	G. Utility Electric Generation in East and Central Texas				
		1.	The application area includes utility electric power boilers and/or stationary gas turbines (including duct burners used in turbine exhaust ducts) that were placed into service before December 31, 1995. If the response to Question IV.G.1 is "NO," go to Question IV.H.1.	UYES XNO	
		2.	The application area is complying with the System Cap in 30 TAC § 117.3020.	YES NO	
	H. Multi-Region Combustion Control - Water Heaters, Small Boilers, and Process Heaters				
		1.	The application area includes a manufacturer, distributor, retailer or installer of natural gas fired water heaters, boilers or process heaters with a maximum rated capacity of 2.0 MMBtu/hr or less. If the response to question IV.H.1 is "NO," go to Section V.	□YES ⊠NO	
		2.	All water heaters, boilers or process heaters manufactured, distributed, retailed or installed qualify for an exemption under 30 TAC § 117.3203.	YES NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	n OP-l	REQ1	: Page 16			
V.		itle 40 Code of Federal Regulations Part 59 (40 CFR Part 59) - National Volatile Organic Compound mission Standards for Consumer and Commercial Products				
	А.	Subr Coat	bile Refir	ıish		
		1.	The application area manufactures automobile refinish coatings or coating components and sells or distributes these coatings or coating components in the United States.	YES	XNO	
		2.	The application area imports automobile refinish coatings or coating components, manufactured on or after January 11, 1999, and sells or distributes these coatings or coating components in the United States. <i>If the responses to Questions V.A.1 and V.A.2 are both "NO," go to Section V.B.</i>	YES	XNO	
		3.	All automobile refinish coatings or coating components manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR § $59.100(c)(1) - (6)$.	YES	NO	
	B.	Subp	oart C - National Volatile Organic Compound Emission Standards for Consun	ner Produ	icts	
		1.	The application area manufactures consumer products for sale or distribution in the United States.	YES	XNO	
		2.	The application area imports consumer products manufactured on or after December 10, 1998 and sells or distributes these consumer products in the United States.	YES	NO	
		3.	The application area is a distributor of consumer products whose name appears on the label of one or more of the products. <i>If the responses to Questions V.B.1 - V.B.3 are all "NO," go to Section V.C.</i>	YES	NO	
		4.	All consumer products manufactured, imported, or distributed by the application area meet one or more of the exemptions specified in 40 CFR § $59.201(c)(1) - (7)$.	YES	NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	Form OP-REQ1: Page 17					
V.			ode of Federal Regulations Part 59 (40 CFR Part 59) - National Volatile Organ Standards for Consumer and Commercial Products (continued)	ic Compo	ound	
	C.	C. Subpart D - National Volatile Organic Compound Emission Standards for Architectural Coatings				
		1.	The application area manufactures or imports architectural coatings for sale or distribution in the United States.	YES	XNO	
		2.	The application area manufactures or imports architectural coatings that are registered under the Federal Insecticide, Fungicide, and Rodenticide Act. <i>If the responses to Questions V.C.1-2 are both "NO," go to Section V.D.</i>	YES	XNO	
		3.	All architectural coatings manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR §59.400(c)(1)-(5).	YES	NO	
	D.	Subj	part E - National Volatile Organic Compound Emission Standards for Aerosol	Coatings		
		1.	The application area manufactures or imports aerosol coating products for sale or distribution in the United States.	YES	XNO	
		2.	The application area is a distributor of aerosol coatings for resale or distribution in the United States.	YES	XNO	
	E.	Subj	part F - Control of Evaporative Emissions From New and In-Use Portable Fue	l Contain	ers	
		1.	The application area manufactures or imports portable fuel containers for sale or distribution in the United States. If the response to Question V.E.1 is "NO," go to Section VI.	YES	NO	
		2.	All portable fuel containers manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR § 59.605(a) - (c).	YES	NO	
VI.	Title	40 C	ode of Federal Regulations Part 60 - New Source Performance Standards			
	A.	. Applicability				
•		1.	The application area includes a unit(s) that is subject to one or more 40 CFR Part 60 subparts. If the response to Question VI.A.1 is "NO," go to Section VII.	XYES	NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	Form OP-REQ1: Page 18					
VI.	Title	40 Co	ode of Federal Regulations Part 60 - New Source Performance Standards (cont	tinued)		
	B.	Subp	5			
		1.	The application area is located at a coal preparation and processing plant. If the response to Question VI.B.1 is "NO," go to Section VI.C.	YES	XNO	
		2.	The coal preparation and processing plant has a design capacity greater than 200 tons per day (tpd). If the response to Question VI.B.2 is "NO," go to Section VI.C.	YES	NO	
		3.	The plant has an option to enforceably limit its operating level to less than 200 tpd and is choosing this option. If the response to Question VI.B.3 is "YES," go to Section VI.C.	YES	NO	
		4.	The plant contains an open storage pile, as defined in § 60.251, as an affected facility. If the response to Question VI.B.4 is "NO," go to Section VI.C.	YES	NO	
		5.	The open storage pile was constructed, reconstructed or modified after May 27, 2009.	YES	NO	
	C.	Subp	oart GG - Standards of Performance for Stationary Gas Turbines (GOP applic	ants only	r)	
•		1.	The application area includes one or more stationary gas turbines that have a heat input at peak load greater than or equal to 10 MMBtu/hr (10.7GJ/hr), based on the lower heating value of the fuel fired. If the response to Question VI.C.1 is "NO" or "N/A," go to Section VI.D.	YES	□NO ▼N/A	
*		2.	One or more of the affected facilities were constructed, modified, or reconstructed after October 3, 1977 and prior to February 19, 2005. <i>If the response to Question VI.C.2 is "NO," go to Section VI.D.</i>	YES	NO	
•		3.	One or more stationary gas turbines in the application area are using a previously approved alternative fuel monitoring schedule as specified in 40 CFR § 60.334(h)(4).	YES	NO	
*		4.	The exemption specified in 40 CFR § 60.332(e) is being utilized for one or more stationary gas turbines in the application area.	YES	NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	n OP-	REQ1	: Page 19		
VI.	Title	40 C	ode of Federal Regulations Part 60 - New Source Performance Standards (cont	tinued)	
	C.	_	part GG - Standards of Performance for Stationary Gas Turbines (GOP applic tinued)	cants only	7)
•		5.	One or more stationary gas turbines subject to 40 CFR Part 60, Subpart GG in the application area is injected with water or steam for the control of nitrogen oxides.	YES	□NO
	D.	Subj	part XX - Standards of Performance for Bulk Gasoline Terminals		
		1.	The application area includes bulk gasoline terminal loading racks. If the response to Question VI.D.1 is "NO," go to Section VI.E.	YES	⊠NO □N/A
		2.	One or more of the loading racks were constructed or modified after December 17, 1980, and are not subject to 40 CFR Part 63, Subpart CC.	YES	NO
	E.		oart LLL - Standards of Performance for Onshore Natural Gas Processing: Su ssions	lfur Diox	tide (SO ₂)
*		1.	The application area includes affected facilities identified in 40 CFR § 60.640(a) that process natural gas (onshore). For SOP applications, if the response to Question VI.E.1 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.1 is "NO" or "N/A," go to Section VI.H.	YES	NO
•		2.	The affected facilities commenced construction or modification after January 20, 1984 and on or before August 23, 2011. For SOP applications, if the response to Question VI.E.2 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.2 is "NO," go to Section VI.H.	YES	NO
•		3.	The application area includes a gas sweetening unit with a design capacity greater than or equal to 2 long tons per day (LTPD) of hydrogen sulfide but operates at less than 2 LTPD. For SOP applications, if the response to Question VI.E.3 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.3 is "NO," go to Section VI.H.	YES	NO

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	Form OP-REQ1: Page 20						
VI.	Title	e 40 C	e 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)				
	E.		part LLL - Standards of Performance for Onshore Natural Gas Processing: Su ssions (continued)	llfur Diox	tide (SO ₂)		
•		4.	 Federally enforceable operating limits have been established in the preconstruction authorization limiting the gas sweetening unit to less than 2 LTPD. For SOP applications, if the response to Question VI.E.4. is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.4. is "NO," go to Section VI.H. 	YES	□NO		
•	5. Please provide the Unit ID(s) for the gas sweetening unit(s) that have established federally enforceal operating limits in the space provided below.				enforceable		
	F.	Sub	part OOO - Standards of Performance for Nonmetallic Mineral Processing Pla	nts			
		1.	The application area includes affected facilities identified in 40 CFR § 60.670(a)(1) that are located at a fixed or portable nonmetallic mineral processing plant. If the response to Question VI.F.1 is "NO," go to Section VI.G.	YES	NO		
		2.	Affected facilities identified in 40 CFR § 60.670(a)(1) and located in the application area are subject to 40 CFR Part 60, Subpart OOO.	YES	NO		
	G.	G. Subpart QQQ - Standards of Performance for VOC Emissions from Petroleum Refinery Wastewater Systems					
		1.	The application area is located at a petroleum refinery and includes one or more of the affected facilities identified in 40 CFR § 60.690(a)(2) - (4) for which construction, modification, or reconstruction was commenced after May 4, 1987. <i>If the response to Question VI.G.1 is "NO," go to Section VI.H.</i>	YES	NO		
		2.	The application area includes storm water sewer systems.	YES	NO		

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	Form OP-REQ1: Page 21						
VI.	Title	40 Co	ode of Federal Regulations Part 60 - New Source Performance Standards (cont	tinued)			
	G.		oart QQQ - Standards of Performance for VOC Emissions from Petroleum Re ems (continued)	finery W	astewater		
		3.	The application area includes ancillary equipment which is physically separate from the wastewater system and does not come in contact with or store oily wastewater.	YES	□NO		
		4.	The application area includes non-contact cooling water systems.	YES	NO		
		5.	The application area includes individual drain systems. If the response to Question VI.G.5 is "NO," go to Section VI.H.	YES	NO		
		6.	The application area includes one or more individual drain systems that meet the exemption specified in 40 CFR § 60.692-2(d).	YES	NO		
		7.	The application area includes completely closed drain systems.	YES	NO		
	H. Subpart AAAA - Standards of Performance for Small Municipal Waste Incineration Units for Construction Commenced After August 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 6, 2004						
•		1.	The application area includes at least one small municipal waste incineration unit, other than an air curtain incinerator. <i>If the response to Question VI.H.1. is "N/A," go to Section VI.I. If the response</i> <i>to Question VI.H.1 is "NO," go to Question VI.H.4.</i>	YES	XNO N/A		
•		2.	The application area includes at least one small municipal waste incineration unit, other than an air curtain incinerator, constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006.	YES	NO		
•		3.	The application area includes at least one small municipal waste incineration unit, other than an air curtain incinerator, constructed before August 30, 1999 and not modified or reconstructed on or after June 6, 2006.	YES	NO		
•		4.	The application area includes at least one air curtain incinerator. If the response to Question VI.H.4 is "NO," go to Section VI.I.	YES	NO		

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	Form OP-REQ1: Page 22							
VI.	Title	e 40 Co	ode of Federal Regulations Part 60 - New Source Performance Standards (cont	tinued)				
	H.	Subpart AAAA - Standards of Performance for Small Municipal Waste Incineration Units for Which Construction Commenced After August 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 6, 2004 (continued)						
•		5.	5. The application area includes at least one air curtain incinerator constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006. <i>If the response to Question VI.H.5 is "NO," go to Question VI.H.7.</i>					
•		6. All air curtain incinerators constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006 combust only yard waste.			NO			
•		7. The application area includes at least one air curtain incinerator constructed before August 30, 1999 and not modified or reconstructed on or after June 6, 2006.		YES	NO			
•		8.	YES	NO				
	I.	Subpart CCCC - Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction Commenced After November 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 1, 2001						
•		1.	YES	⊠NO □N/A				
•		Question VI.1.1 is "NO," go to Question VI.1.4. 2. The application area includes at least one commercial or industrial solid waste incineration unit, other than an air curtain incinerator, constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001.						

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	Form OP-REQ1: Page 23							
VI.	Title	e 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)						
	I. Subpart CCCC - Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction Commenced After November 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 1, 2001 (continued)							
•		3.	The application area includes at least one commercial or industrial solid waste incineration unit, other than an air curtain incinerator, constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001.	YES	□NO			
*		4.	The application area includes at least one air curtain incinerator. If the response to Question VI.I.4 is "NO," go to Section VI.J.	YES	NO			
•		5.	The application area includes at least one air curtain incinerator, constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001. <i>If the response to Question VI.I.5 is "NO," go to VI.I.7.</i>	YES	NO			
•		6.	All air curtain incinerators constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	YES	NO			
•		7.	The application area includes at least one air curtain incinerator, constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001.	YES	NO			
•		8.	All air curtain incinerators constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	YES	NO			

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	Form OP-REQ1: Page 24								
VI.	Title	40 Co	40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)						
	J.	5. Subpart EEEE - Standards of Performance for Other Solid Waste Incineration Units for Which Construction Commenced After December 9, 2004 or for Which Modification or Reconstruction Commenced on or After June 16, 2006							
•		1.	The application area includes at least one very small municipal waste incineration unit or institutional incineration unit, other than an air curtain incinerator. If the response to Question VI.J.1 is "N/A," go to Section VI.K. If the response to Question VI.J.4.	YES	XNO N/A				
•		2.	The application area includes at least one very small municipal waste incineration unit, other than an air curtain incinerator, constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006.	YES	□NO				
•		3.	The application area includes at least one very small municipal waste incineration unit, other than an air curtain incinerator, constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006.	YES	□NO				
*		4.	The application area includes at least one air curtain incinerator. If the response to Question VI.J.4 is "NO," go to Section VI.K.	YES	XNO				
•		5.	The application area includes at least one air curtain incinerator constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006. <i>If the response to Question VI.J.5 is "NO," go to Question VI.J.7.</i>	YES	NO				
•		6.	All air curtain incinerators constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	YES	NO				
•		7.	The application area includes at least one air curtain incinerator constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006.	YES	NO				

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Forn	Form OP-REQ1: Page 25							
VI.	Title	40 C	ode of Federal Regulations Part 60 - New Source Performance Standards (NSP	'S) (contii	nued)			
	J.	Subpart EEEE - Standards of Performance for Other Solid Waste Incineration Units for Which Construction Commenced After December 9, 2004 or for Which Modification or Reconstruction Commenced on or After June 16, 2006 (continued)						
•		8. All air curtain incinerators constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.						
•		9.	The air curtain incinerator is located at an institutional facility and is a distinct operating unit of the institutional facility that generated the waste.	YES	NO			
•		YES	NO					
	К.		part OOOO - Standards of Performance for Crude Oil and Natural Gas Produ Ismission and Distribution	ction,				
•		1.	The application area includes one or more of the onshore affected facilities listed in 40 CFR § 60.5365(a)-(g) that are subject to 40 CFR Part 60, Subpart OOOO.	YES	NO			
VII.	Title	40 C	ode of Federal Regulations Part 61 - National Emission Standards for Hazardo	us Air Po	ollutants			
	A.	Арр	licability					
*		1.	The application area includes a unit(s) that is subject to one or more 40 CFR Part 61 subparts. If the response to Question VII.A.1 is "NO" or "N/A," go to Section VIII.	× YES	□NO □N/A			
	B.	Subj	part F - National Emission Standard for Vinyl Chloride					
		YES	NO					
	C.	_	part J - National Emission Standard for Benzene Emissions for Equipment Lea ssion Sources) of Benzene (Complete this section for GOP applications only)	ıks				
•		1.	The application area includes equipment in benzene service.	YES	□NO □N/A			

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Forn	Form OP-REQ1: Page 26							
VII.		e 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants htinued)						
	D.	-	Subpart L - National Emission Standard for Benzene Emissions from Coke By-Proc Plants					
		1.	UYES 🗙]NO				
		2. The application area includes equipment in benzene service as determined by 40 CFR § 61.137(b).						
		YES]NO					
	E.	Subp	oart M - National Emission Standard for Asbestos					
		Applicability						
		1.	The application area includes sources, operations, or activities specified in 40 CFR §§ 61.143, 61.144, 61.146, 61.147, 61.148, or 61.155. <i>If the response to Question VII.E.1 is "NO," go to Section VII.F.</i>	TYES 🗵]NO			
		Road	lway Construction					
		2.	The application area includes roadways constructed or maintained with asbestos tailings or asbestos-containing waste material.	YES]NO			
		Man	ufacturing Commercial Asbestos					
		3.	The application area includes a manufacturing operation using commercial asbestos. If the response to Question VII.E.3 is "NO," go to Question VII.E.4.	YES]NO			
			TYES T					
		a. Visible emissions are discharged to outside air from the manufacturing operation]NO			
			YES]NO				

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Forn	Form OP-REQ1: Page 27							
VII.	Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)							
	E. Subpart M - National Emission Standard for Asbestos (continued)							
	Manufacturing Commercial Asbestos (continued)							
			c.	Asbestos-containing waste material is processed into non-friable forms.	YES	NO		
			d.	Asbestos-containing waste material is adequately wetted.	YES	NO		
			e.	Alternative filtering equipment is being used that has received EPA approval.	YES	NO		
			f.	A high efficiency particulate air (HEPA) filter is being used that is certified to be at least 99.97% efficient for 0.3 micron particles	YES	NO		
			g.	The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.	YES	NO		
		Asbe	stos Sj	pray Application				
		4.	are sp	application area includes operations in which asbestos-containing materials pray applied. <i>e response to Question VII.E.4 is "NO," go to Question VII.E.5.</i>	YES	□NO		
			a. <i>If the</i>	Asbestos fibers are encapsulated with a bituminous or resinous binder during spraying and are not friable after drying. e response to Question VII.E.4.a is "YES," go to Question VII.E.5.	YES	□NO		
			b.	Spray-on applications on buildings, structures, pipes, and conduits do not use material containing more than 1% asbestos.	YES	NO		
			c.	An alternative emission control and waste treatment method is being used that has received prior EPA approval.	YES	□NO		

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	Form OP-REQ1: Page 28							
VII.		itle 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants ontinued)						
	E. Subpart M - National Emission Standard for Asbestos (continued)							
		Asbes	stos Sj	pray Application (continued)				
			d.	Asbestos-containing waste material is processed into non-friable forms.	YES	NO		
			e.	Asbestos-containing waste material is adequately wetted.	YES	NO		
			f.	Alternative filtering equipment is being used that has received EPA approval.	YES	NO		
			g.	A HEPA filter is being used that is certified to be at least 99.97% efficient for 0.3 micron particles.	YES	NO		
			h.	The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.	YES	NO		
		Fabr	icatin	g Commercial Asbestos				
		5.		application area includes a fabricating operation using commercial asbestos. <i>e response to Question VII.E.5 is "NO," go to Question VII.E.6.</i>	YES	□NO		
			a.	Visible emissions are discharged to outside air from the manufacturing operation.	YES	NO		
			b.	An alternative emission control and waste treatment method is being used that has received prior EPA approval.	YES	NO		
			c.	Asbestos-containing waste material is processed into non-friable forms.	YES	NO		
			d.	Asbestos-containing waste material is adequately wetted.	YES	NO		
			e.	Alternative filtering equipment is being used that has received EPA approval.	YES	NO		

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	Form OP-REQ1: Page 29								
VII.		e 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants tinued)							
	E.	Subp	Subpart M - National Emission Standard for Asbestos (continued)						
		Fabr	ricating	g Commercial Asbestos (continued)					
			f.	A HEPA filter is being used that is certified to be at least 99.97% efficient for 0.3 micron particles.	YES	NO			
			g.	The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.	YES	NO			
		Non-	-spraye	ed Asbestos Insulation					
		6.	insula	application area includes insulating materials (other than spray applied ating materials) that are either molded and friable or wet-applied and friable drying.	YES	□NO			
		Asbe	estos C	onversion					
		7.	conta	application area includes operations that convert regulated asbestos- uning material and asbestos-containing waste material into nonasbestos estos-free) material.	YES	□NO			
	F.			- National Emission Standard for Inorganic Arsenic Emissions from Ars rsenic Production Facilities	senic Trio	oxide and			
		1.	arsen	application area is located at a metallic arsenic production plant or at an ic trioxide plant that processes low-grade arsenic bearing materials by a ing condensation process.	YES	NO			
	G.	. Subpart BB - National Emission Standard for Benzene Emissions from Benzene Transfer Operations							
		1.	termi	application area is located at a benzene production facility and/or bulk nal. <i>response to Question VII.G.1 is "NO," go to Section VII.H.</i>	YES	NO			
		2.		application area includes benzene transfer operations at marine vessel ng racks.	YES	NO			

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	Form OP-REQ1: Page 30							
VII.		le 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants ntinued)						
	G.	Subpart BB - National Emission Standard for Benzene Emissions from Benzene Transfer Operations (continued)						
		3.	YES	NO				
		4.	The application area includes benzene transfer operations at tank-truck loading racks.	YES	NO			
	H.	Subj	part FF - National Emission Standard for Benzene Waste Operations					
		Appl	licability					
		1.	The application area includes a chemical manufacturing plant, coke by-product recovery plant, or petroleum refinery facility as defined in § 61.341.	× YES	□NO			
			The application area is located at a hazardous waste treatment, storage, and disposal (TSD) facility site as described in 40 CFR § 61.340(b). <i>If the responses to Questions VII.H.1 and VII.H.2 are both "NO," go to Section VIII.</i>	☐YES	⊠NO			
		3.	The application area is located at a site that has no benzene onsite in wastes, products, byproducts, or intermediates. If the response to Question VII.H.3 is "YES," go to Section VIII.	YES	NO			
	4.		The application area is located at a site having a total annual benzene quantity from facility waste less than 1 megagram per year (Mg/yr). <i>If the response to Question VII.H.4 is "YES," go to Section VIII</i>	YES	NO			
		5.	The application area is located at a site having a total annual benzene quantity from facility waste greater than or equal to 1 Mg/yr but less than 10 Mg/yr. <i>If the response to Question VII.H.5 is "YES," go to Section VIII.</i>	YES	NO			

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	Form OP-REQ1: Page 31							
VII.		e 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants atinued)						
	H.	Subpart FF - National Emission Standard for Benzene Waste Operations (continued)						
		Appl	icability (continued)					
		6.	The flow-weighted annual average benzene concentration of each waste stream at the site is based on documentation.	X YES	NO			
		7.	The application area has waste streams with flow-weighted annual average water content of 10% or greater.	XYES	NO			
		Wast	te Stream Exemptions					
		8.	The application area has waste streams that meet the exemption specified in 40 CFR § $61.342(c)(2)$ (the flow-weighted annual average benzene concentration is less than 10 ppmw).	XYES X	□NO			
		9.	The application area has waste streams that meet the exemption specified in 40 CFR § $61.342(c)(3)$ because process wastewater has a flow rate less than 0.02 liters per minute or an annual wastewater quantity less than 10 Mg/yr.	XYES	□NO			
		10.	The application area has waste streams that meet the exemption specified in 40 CFR § $61.342(c)(3)$ because the total annual benzene quantity is less than or equal to 2 Mg/yr.	YES	NO			
		11.	The application area transfers waste off-site for treatment by another facility.	XYES X	NO			
		12.	The application area is complying with 40 CFR § 61.342(d).	YES	XNO			
		13.	The application area is complying with 40 CFR § 61.342(e). If the response to Question VII.H.13 is "NO," go to Question VII.H.15.	XYES 🛛	NO			
		14.	The application area has facility waste with a flow weighted annual average water content of less than 10%.	YES	NO			

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	Form OP-REQ1: Page 32							
VII.		e 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants ntinued)						
	H.	. Subpart FF - National Emission Standard for Benzene Waste Operations (continued)						
		Cont	tainer Requirements					
		15.	The application area has containers, as defined in 40 CFR § 61.341, that receive non-exempt benzene waste. <i>If the response to Question VII.H.15 is "NO," go to Question VII.H.18.</i>	XYES	NO			
		16.	The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers. <i>If the response to Question VII.H.16 is "YES," go to Question VII.H.18.</i>	YES	XNO			
		17.	Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	YES	NO			
		Indiv	vidual Drain Systems					
		18.	The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage non-exempt benzene waste. If the response to Question VII.H.18 is "NO," go to Question VII.H.25.	XYES	NO			
		19.	The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. <i>If the response to Question VII.H.19 is "YES," go to Question VII.H.25.</i>	YES	NO			
		20.	The application area has individual drain systems complying with 40 CFR § 61.346(a). <i>If the response to Question VII.H.20 is "NO," go to Question VII.H.22.</i>	X YES	NO			
		21.	Covers and closed-vent systems used for individual drain systems operate such that the individual drain system is maintained at a pressure less than atmospheric pressure.	YES	NO			

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	Form OP-REQ1: Page 33						
VII.		le 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants ntinued)					
	H.	Subp	part FF - National Emission Standard for Benzene Waste Operations (continue	ed)			
		Indiv	vidual Drain Systems (continued)				
		22.	The application area has individual drain systems complying with 40 CFR § 61.346(b).	YES	NO		
			If the response to Question VII.H.22 is "NO," go to Question VII.H.25.				
		23.	Junction boxes in the individual drain systems are equipped with a system to prevent the flow of organic vapors from the junction box vent pipe to the atmosphere during normal operation.	YES	□NO		
		24.	Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device.	YES	□NO		
		Rem	ediation Activities				
		25.	Remediation activities take place at the application area subject to 40 CFR Part 61, Subpart FF.	YES	NO		
VIII.			ode of Federal Regulations Part 63 - National Emission Standards for Hazardo c Categories	ous Air Po	ollutants		
	A.	App	licability				
*		1.	The application area includes a unit(s) that is subject to one or more 40 CFR Part 63 subparts other than subparts made applicable by reference under subparts in 40 CFR Part 60, 61 or 63. See instructions for 40 CFR Part 63 subparts made applicable only by reference.	XYES	NO		
	B.	Subpart F - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry					
		1.	The application area is located at a plant site that is a major source as defined in the Federal Clean Air Act § 112(a). <i>If the response to Question VIII.B.1 is "NO," go to Section VIII.D.</i>	XYES (NO		

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-1	Form OP-REQ1: Page 34					
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)					
В.		Subpart F - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry (continued)				
	2.	The application area is located at a site that includes at least one chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii). <i>If the response to Question VIII.B.2 is "NO," go to Section VIII.D.</i>	XYES (NO		
	3.	The application area is located at a site that includes at least one chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii) and uses as a reactant or manufactures as a product, or co-product, one or more of the organic hazardous air pollutants listed in table 2 of 40 CFR Part 63, Subpart F.	YES	NO		
	4.	The application area includes a chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § $63.100(b)(1)(i)$ or $(b)(1)(ii)$ and uses as a reactant or manufactures as a product, or co-product, one or more of the organic hazardous air pollutants listed in table 2 of 40 CFR Part 63, Subpart F.	YES	NO		
	5.	The application area includes a chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii) and does <u>not</u> use as a reactant or manufacture as a product, or co-product, one or more of the organic hazardous air pollutants listed in table 2 of 40 CFR Part 63, Subpart F. <i>If the response to Questions VIII.B.3, B.4 and B.5 are all "NO," go to</i> <i>Section VIII.D.</i>	YES	XNO		

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-	Form OP-REQ1: Page 35					
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)					
C.	Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater					
	Appl	icability				
	1.	The application area is located at a site that is subject to 40 CFR 63, Subpart F and the application area includes process vents, storage vessels, transfer racks, or waste streams associated with a chemical manufacturing process subject to 40 CFR 63, Subpart F. <i>If the response to Question VIII.C.1 is "NO," go to Section VIII.D.</i>	XYES	□NO		
	2.	The application area includes fixed roofs, covers, and/or enclosures that are required to comply with 40 CFR § 63.148.	XYES	NO		
	3.	The application area includes vapor collection systems or closed-vent systems that are required to comply with 40 CFR § 63.148. <i>If the response to Question VIII.C.3 is "NO," go to Question VIII.C.8.</i>	XYES	□NO		
	4.	The application area includes vapor collection systems or closed-vent systems that are constructed of hard-piping.	XYES	NO		
	5.	The application area includes vapor collection systems or closed-vent systems that contain bypass lines that could divert a vent stream away from a control device and to the atmosphere. <i>If the response to Question VIII.C.5 is "NO," go to Question VIII.C.8.</i>	YES	XNO		
	Vapor Collection and Closed Vent Systems					
	6.	Flow indicators are installed, calibrated, maintained, and operated at the entrances to bypass lines in the application area.	YES	NO		
	7.	Bypass lines in the application area are secured in the closed position with a car- seal or a lock-and-key type configuration.	YES	NO		

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-	Form OP-REQ1: Page 36				
		ode of Federal Regulations Part 63 - National Emission Standards for Hazardo categories (continued)	ous Air Po	ollutants	
C.	Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)				
	Relo	ading or Cleaning of Railcars, Tank Trucks, or Barges			
	8.	The application area includes reloading and/or cleaning of railcars, tank trucks, or barges that deliver HAPs to a storage tank. If the response to Question VIII.C.8 is "NO," go to Question VIII.C.11.	YES	NO	
	9.	The application area includes operations that are complying with § $63.119(g)(6)$ through the use of a closed-vent system with a control device used to reduce inlet emissions of HAPs by at least 95 percent by weight or greater.	YES	□NO	
	10.	The application area includes operations that are complying with § $63.119(g)(6)$ through the use of a vapor balancing system.	YES	NO	
	Tran	esfer Racks	•		
	11.	The application area includes Group 1 transfer racks that load organic HAPs.	YES	XNO	
	Proc	ess Wastewater Streams			
	12.	The application area includes process wastewater streams. If the response to Question VIII.C.12 is "NO," go to Question VIII.C.34.	X YES	□NO	
	13.	The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Part 61, Subpart FF. <i>If the response to Question VIII.C.13 is "NO," go to Question VIII.C.15.</i>	XYES	□NO	
	14.	The application area includes process wastewater streams that are complying with 40 CFR §§ $63.110(e)(1)(i)$ and $(e)(1)(ii)$.	X YES	NO	
	15.	The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Part 61, Subpart F. <i>If the response to Question VIII.C.15 is "NO," go to Question VIII.C.17.</i>	YES	NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-	Form OP-REQ1: Page 37				
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)				
C.	C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)				
	Proc	ess Wastewater Streams (continued)			
	16.	The application area includes process wastewater streams utilizing the compliance option specified in 40 CFR § $63.110(f)(4)(ii)$.	YES	NO	
	17.	The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Parts 260 through 272. <i>If the response to Question VIII.C.17 is "NO," go to Question VIII.C.20.</i>	YES	NO	
	18.	The application area includes process wastewater streams complying with 40 CFR § $63.110(e)(2)(i)$.	YES	NO	
	19.	The application are includes process wastewater streams complying with $40 \text{ CFR } \S 63.110(e)(2)(ii).$	YES	NO	
	20.	The application area includes process wastewater streams, located at existing sources, that are designated as Group 1; are required to be treated as Group 1 under 40 CFR § 63.110; or are determined to be Group 1 for Table 9 compounds.	YES	NO	
	21.	The application area includes process wastewater streams, located at existing sources that are Group 2.	XYES	NO	
	22.	The application area includes process wastewater streams, located at new sources, that are designated as Group 1; required to be treated as Group 1 under 40 CFR § 63.110; or are determined to be Group 1 for Table 8 or Table 9 compounds.	YES	NO	
	23.	The application area includes process wastewater streams, located at new sources that are Group 2 for both Table 8 and Table 9 compounds.	YES	NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-R	Form OP-REQ1: Page 38				
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)				
C.	Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)				
	Proc	ess Wastewater Streams (continued)			
	24.	All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. If the response to Question VIII.C.24 is "YES," go to Question VIII.C.34.	YES	NO	
	25.	The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.C.25 is "NO," go to Question VIII.C.27.</i>	YES	⊠NO	
	26.	The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	YES	□NO	
	27.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	YES	NO	
	28.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.C.27 - VIII.C.28 are both "NO," go to</i> <i>Question VIII.C.30.</i>	YES	NO	
	29.	The application area includes waste management units that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	YES	□NO	
	30.	The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	XYES 🛛	NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-	Form OP-REQ1: Page 39				
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)					
C.	Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)				
	Drai	ns			
	31.	The application area includes individual drain systems that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream. If the response to Question VIII.C.31 is "NO," go to Question VIII.C.34.	YES	NO	
	32.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	YES	□NO	
	33.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	YES	NO	
	34.	The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of a chemical manufacturing process unit that meets the criteria of 40 CFR § 63.100(b). <i>If the response to Question VIII.C.34 is "NO," go to Question VIII.C.39.</i>	YES	NO	
	35.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes (that are part of a chemical manufacturing process unit) that meet the criteria listed in 40 CFR § 63.149(d). <i>If the response to Question VIII.C.35 is "NO," go to Question VIII.C.39.</i>	YES	NO	
	36.	The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds listed in 40 CFR Part 63 Subpart G, Table 9, at any flow rate.	YES	NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-	Form OP-REQ1: Page 40				
		ode of Federal Regulations Part 63 - National Emission Standards for Hazardo e Categories (continued)	ous Air Po	ollutants	
C.	Org	Subpart G-National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operation, and Wastewater (continued)			
	Drai	ins (continued)			
	37.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds listed in 40 CFR Part 63 Subpart G, Table 9, at an annual average flow rate greater than or equal to 10 liters per minute.	YES	NO	
	38.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of a chemical manufacturing process unit that is subject to the new source requirements of 40 CFR § $63.100(1)(1)$ or $(1)(2)$; and the equipment conveys water with a total annual average concentration greater than or equal to 10 parts per million by weight of compounds listed in 40 CFR Part 63 Subpart G, Table 8, at an average annual flow rate greater than or equal to 0.02 liter per minute.	YES	NO	
	Gas	Streams			
	39.	The application area includes gas streams meeting the characteristics of 40 CFR § 63.107(b) - (h) or the criteria of 40 CFR § 63.113(i) and are transferred to a control device not owned or operated by the applicant.	YES	⊠NO	
	40.	The applicant is unable to comply with 40 CFR §§ $63.113 - 63.118$ for one or more reasons described in 40 CFR § $63.100(q)(1)$, (3), or (5).	YES	NO	
D.	Subpart N - National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks			tive	
	1.	The application area includes chromium electroplating or chromium anodizing tanks located at hard chromium electroplating, decorative chromium electroplating, and/or chromium anodizing operations.	YES	NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-	REQ1	: Page 41				
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)					
E.	Subj	part O - Ethylene Oxide Emissions Standards for Sterilization Facilities				
	 The application area includes sterilization facilities where ethylene oxide is used in the sterilization or fumigation of materials. If the response to Question VIII.E.1 is "NO," go to Section VIII.F. 					
	2.	Sterilization facilities located in the application area are subject to 40 CFR Part 63, Subpart O. <i>If the response to Question VIII.E.2 is "NO," go to Section VIII.F.</i>	YES	□NO		
	3.	The sterilization source has used less than 1 ton (907 kg) of ethylene oxide within all consecutive 12-month periods after December 6, 1996.	YES	NO		
	4.	The sterilization source has used less than 10 tons (9070 kg) of ethylene oxide within all consecutive 12-month periods after December 6, 1996.	YES	NO		
F.	Subj	part Q - National Emission Standards for Industrial Process Cooling Towers				
	1.	The application area includes industrial process cooling towers. If the response to Question VIII.F.1 is "NO," go to Section VIII.G.	XYES	□NO		
	2.	Chromium-based water treatment chemicals have been used on or after September 8, 1994.	YES	XNO		
G.		part R - National Emission Standards for Gasoline Distribution Facilities (Bull ninals and Pipeline Breakout Stations)	k Gasolin	e		
	1.	The application area includes a bulk gasoline terminal.	YES	×NO		
	2.	The application area includes a pipeline breakout station. If the responses to Questions VIII.G.1 and VIII.G.2 are both "NO," go to Section VIII.H.	YES	XNO		
	3.	The bulk gasoline terminal or pipeline breakout station is located within a contiguous area and under common control with another bulk gasoline terminal or a pipeline breakout station. If the response to Question VIII.G.3 is "YES," go to Question VIII.G.10.	YES	NO		

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-	Form OP-REQ1: Page 42				
		ode of Federal Regulations Part 63 - National Emission Standards for Hazardo categories (continued)	ous Air Po	ollutants	
G.	G. Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Ga Terminals and Pipeline Breakout Stations) (continued)				
	4.	The bulk gasoline terminal or pipeline breakout station is located within a contiguous area and under common control with sources, other than bulk gasoline terminals or pipeline breakout stations that emit or have the potential to emit HAPs.	YES	NO	
		If the response to Question VIII.G.4 is "YES," go to Question VIII.G.10.			
	5.	An emissions screening factor was calculated for the bulk gasoline terminal or pipeline breakout station.	YES	□NO	
		If the response to Question VIII.G.5 is "NO," go to Question VIII.G.10.			
	6.	The value 0.04(OE) is less than 5% of the value of the bulk gasoline terminal emissions screening factor (ET) or the pipeline breakout station emissions screening factor (Ep). If the response to Question VIII.G.6 is "NO," go to Question VIII.G.10.	YES	□NO	
	7.	Emissions screening factor less than 0.5 (ET or EP < 0.5). If the response to Question VIII.G.7 is "YES," go to Section VIII.H.	YES	NO	
	8.	Emissions screening factor greater than or equal to 0.5, but less than $1.0 (0.5 \le \text{ET or EP} < 1.0)$. If the response to Question VIII.G.8 is "YES," go to Section VIII.H.	YES	□NO	
	9.	Emissions screening factor greater than or equal to 1.0 (ET or EP \ge 1.0). <i>If the response to Question VIII.G.9 is "YES," go to Question VIII.G.11.</i>	YES	NO	
	10.	The site at which the application area is located is a major source of HAP. If the response to Question VIII.G.10 is "NO," go to Section VIII.H.	YES	□NO	
	11.	The application area is using an alternative leak monitoring program as described in 40 CFR § $63.424(f)$.	YES	NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-1	Form OP-REQ1: Page 43				
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)				
Н.	Subpart S - National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry				
	1.	The application area includes processes that produce pulp, paper, or paperboard and are located at a plant site that is a major source of HAPs as defined in 40 CFR § 63.2.	YES	NO	
		If the response to Question VIII.H.1 is "NO," go to Section VIII.I.			
	2.	The application area uses processes and materials specified in 40 CFR § $63.440(a)(1) - (3)$.	YES	NO	
		If the response to Question VIII.H.2 is "NO," go to Section VIII.I.			
	3.	The application area includes one or more sources subject to 40 CFR Part 63, Subpart S that are existing sources.	YES	NO	
		If the response to Question VIII.H.3 is "NO," go to Section VIII.I.			
	4.	The application area includes one or more kraft pulping systems that are existing sources.	YES	□NO	
	5.	The application area includes one or more dissolving-grade bleaching systems that are existing sources at a kraft or sulfite pulping mill.	YES	NO	
	6.	The application area includes bleaching systems that are existing sources and are complying with the Voluntary Advanced Technology Incentives Program for Effluent Limitation Guidelines in 40 CFR § 430.24. <i>If the response to Question VIII.H.6 is "NO," go to Section VIII.I.</i>	YES	NO	
	7.	The application area includes bleaching systems that are complying with 40 CFR § $63.440(d)(3)(i)$.	YES	NO	
	8.	The application area includes bleaching systems that are complying with 40 CFR § 63.440(d)(3)(ii).	YES	NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	OP-I	REQ1:	Page 44			
11	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)					
	I.	Subp	oart T - National Emission Standards for Halogenated Solvent Cleaning			
		1.	The application area includes an individual batch vapor, in-line vapor, in-line cold, and/or batch cold solvent cleaning machine that uses a hazardous air pollutant (HAP) solvent, or any combination of halogenated HAP solvents, in a total concentration greater than 5% by weight, as a cleaning and/or drying agent.	YES	NO	
		2.	The application area is located at a major source and includes solvent cleaning machines, qualifying as affected facilities, that use perchloroethylene, trichloroethylene or methylene chloride.	YES	NO	
		3.	The application area is located at an area source and includes solvent cleaning machines, other than cold batch cleaning machines, that use perchloroethylene, trichloroethylene or methylene chloride.	YES	NO	
	J.	-	oart U - National Emission Standards for Hazardous Air Pollutant Emissions: Resins	Group 1	Polymers	
		1.	The application area includes elastomer product process units and/or wastewater streams and wastewater operations that are associated with elastomer product process units. If the response to Question VIII.J.1 is "NO," go to Section VIII.K.	YES	NO	
		2.	Elastomer product process units and/or wastewater streams and wastewater operations located in the application area are subject to 40 CFR Part 63, Subpart U. <i>If the response to Question VIII.J.2 is "NO," go to Section VIII.K.</i>	YES	NO	
		3.	The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 for organic HAPs as defined in 40 CFR § 63.482.	YES	□NO	
		4.	The application area includes process wastewater streams that are Group 2 for organic HAPs as defined in 40 CFR § 63.482.	YES	NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-	Form OP-REQ1: Page 45				
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)				
J.	J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins (continued)				
	5.	All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.J.5 is "YES," go to Question VIII.J.15.</i>	YES	NO	
	6.	The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.J.6 is "NO," go to Question VIII.J.8.</i>	YES	NO	
	7.	The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	YES	NO	
	8.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	YES	NO	
	9.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.J.8 - VIII.J.9 are both "NO," go to Question</i> <i>VIII.J.11.</i>	YES	NO	
	10.	The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	YES	NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-	Form OP-REQ1: Page 46				
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)				
J.	Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins (continued)				
	Cont	ainers			
	11.	The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	YES	NO	
	Drai	ns			
	12.	The application area includes individual drain systems that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. If the response to Question VIII.J.12 is "NO," go to Question VIII.J.15.	YES	NO	
	13.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	YES	NO	
	14.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	YES	NO	
	15.	The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of an elastomer product process unit. <i>If the response to Question VIII.J.15 is "NO," go to Section VIII.K.</i>	YES	NO	
	16.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that meet the criteria listed in 40 CFR § 63.149(d) and § 63.501(a)(12). <i>If the response to Question VIII.J.16 is "NO," go to Section VIII.K.</i>	YES	NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-	Form OP-REQ1: Page 47				
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)				
J.	Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins (continued)				
	Drai	ns (continued)			
	17.	The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.482, at any flow rate.	YES	NO	
	18.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.482, at an annual average flow rate greater than or equal to 10 liters per minute.	YES	NO	
	19.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of an elastomer product process unit that is a new affected source or part of a new affected source and the equipment conveys water with a total annual average concentration greater than or equal to 10 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.482, at an average annual flow rate greater than or equal to 0.02 liter per minute.	YES	□NO	
К.	K. Subpart W - National Emission Standards for Hazardous Air Pollutants for Epoxy Resins Production and Non-nylon Polyamides Production				
	1.	The manufacture of basic liquid epoxy resins (BLR) and/or manufacture of wet strength resins (WSR) is conducted in the application area. <i>If the response to Question VIII.K.1 is "NO" or "N/A," go to Section VIII.L.</i>	YES	⊠NO □N/A	
	2.	The application area includes a BLR and/or WSR research and development facility.	YES	□NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-	REQ1	: Page 48		
		ode of Federal Regulations Part 63 - National Emission Standards for Hazardo e Categories (continued)	ous Air Po	ollutants
L.	Subpart X - National Emission Standards for Hazardous Air Pollutants from Secondary Lead Smelting			
	1.	The application area includes one or more of the affected sources in 40 CFR § 63.541(a) that are located at a secondary lead smelter. If the response to Question VIII.L.1 is "NO" or "N/A," go to Section VIII.M.	YES	⊠NO □N/A
	2.	The application area is using and approved alternate to the requirements of § 63.545(c)(1)-(5) for control of fugitive dust emission sources.	YES	NO
М.	Subpart Y - National Emission Standards for Marine Tank Vessel Loading Operations			
	1.	The application area includes marine tank vessel loading operations that are specified in 40 CFR § 63.560 and located at an affected source as defined in 40 CFR § 63.561.	YES	NO
N.	Sub	part CC - National Emission Standards for Hazardous Air Pollutants from Pet	roleum F	Refineries
	App	licability		
	1.	The application area includes petroleum refining process units and/or related emission points that are specified in 40 CFR § $63.640(c)(1) - (c)(7)$. <i>If the response to Question VIII.N.1 is "NO," go to Section VIII.O.</i>	YES	NO
	2.	All petroleum refining process units/and or related emission points within the application area are specified in 40 CFR § 63.640(g)(1) - (g)(7). <i>If the response to Question VIII.N.2 is "YES," go to Section VIII.O.</i>	YES	NO

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-H	REQ1.	: Page 49			
		ode of Federal Regulations Part 63 - National Emission Standards for Hazardo Categories (continued)	us Air Po	ollutants	
N.	Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries (continued)				
	Appl	icability (continued)			
	3.	The application area is located at a plant site that is a major source as defined in the Federal Clean Air Act § 112(a). <i>If the response to Question VIII.N.3 is "NO," go to Section VIII.O.</i>	YES	□NO	
	4.	The application area is located at a plant site which emits or has equipment containing/contacting one or more of the HAPs listed in table 1 of 40 CFR Part 63, Subpart CC. If the response to Question VIII.N.4 is "NO," go to Section VIII.O.	YES	NO	
	5.	The application area includes Group 1 wastewater streams that are not conveyed, stored, or treated in a wastewater stream management unit that also receives streams subject to the provisions of 40 CFR §§ 63.133 - 63.147 of Subpart G wastewater provisions section.	YES	NO	
	6.	The application area includes Group 2 wastewater streams that are not conveyed, stored, or treated in a wastewater stream management unit that also receives streams subject to the provisions of 40 CFR §§ 63.133 - 63.147 of Subpart G wastewater provisions section.	YES	NO	
	7.	The application area includes Group 1 or Group 2 wastewater streams that are conveyed, stored, or treated in a wastewater stream management unit that also receives streams subject to the provisions of 40 CFR §§ 63.133 - 63.147 of Subpart G wastewater provisions section. <i>If the response to Question VIII.N.7 is "NO," go to Section VIII.O.</i>	YES	NO	
	8.	The application area includes Group 1 or Group 2 wastewater streams that are complying with 40 CFR § 63.640(o)(2)(i).	YES	□NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-	Form OP-REQ1: Page 50					
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)					
N.		Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries (continued)				
	Appl	licability (continued)				
	9.	The application area includes Group 1 or Group 2 wastewater streams that are complying with 40 CFR § 63.640(o)(2)(ii). <i>If the response to Question VIII.N.9 is "NO," go to Section VIII.O.</i>	YES	□NO		
	10.	The application area includes Group 2 wastewater streams or organic streams whose benzene emissions are subject to control through the use of one or more treatment processes or waste management units under the provisions of 40 CFR Part 61, Subpart FF on or after December 31, 1992.	YES	NO		
	Con	tainers, Drains, and other Appurtenances				
	11.	The application area includes containers that are subject to the requirements of 40 CFR § 63.135 as a result of complying with 40 CFR § $63.640(o)(2)(ii)$.	YES	NO		
	12.	The application area includes individual drain systems that are subject to the requirements of 40 CFR § 63.136 as a result of complying with 40 CFR § 63.640(o)(2)(ii).	YES	□NO		
0.	Subj	part DD - National Emission Standards for Off-site Waste and Recovery Opera	ations			
	1.	The application area receives material that meets the criteria for off-site material as specified in 40 CFR § 63.680(b)(1). If the response to Question VIII.O.1 is "NO" or "N/A," go to Section VIII.P	YES	⊠NO □N/A		
	2.	Materials specified in 40 CFR § 63.680(b)(2) are received at the application area.	YES	NO		
	3.	The application area has a waste management operation receiving off-site material and is regulated under 40 CFR Part 264 or Part 265.	YES	□NO		

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-	REQ1.	: Page 51		
		ode of Federal Regulations Part 63 - National Emission Standards for Hazardo Categories (continued)	ous Air Po	ollutants
0.	Subp	oart DD - National Emission Standards for Off-site Waste and Recovery Opera	ations (co	ntinued)
	4.	The application area has a waste management operation treating wastewater which is an off-site material and is exempted under 40 CFR §§ $264.1(g)(6)$ or $265.1(c)(10)$.	YES	NO
	5.	The application area has an operation subject to Clean Water Act, § 402 or § 307(b) but is not owned by a "state" or "municipality."	YES	NO
	6.	The predominant activity in the application area is the treatment of wastewater received from off-site.	YES	NO
	7.	The application area has a recovery operation that recycles or reprocesses hazardous waste which is an off-site material and is exempted under 40 CFR §§ 264.1(g)(2) or 265.1(c)(6).	YES	NO
	8.	The application area has a recovery operation that recycles or reprocesses used solvent which is an off-site material and is not part of a chemical, petroleum, or other manufacturing process that is required to use air emission controls by another subpart of 40 CFR Part 63 or Part 61.	YES	NO
	9.	The application area has a recovery operation that re-refines or reprocesses used oil which is an off-site material and is regulated under 40 CFR Part 279, Subpart F (Standards for Used Oil Processors and Refiners).	YES	NO
	10.	The application area is located at a site where the total annual quantity of HAPs in the off-site material is less than 1 megagram per year. <i>If the response to Question VIII.O.10 is "YES," go to Section VIII.P.</i>	YES	□NO

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-	Form OP-REQ1: Page 52				
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)				
0.	Subp	oart DD - National Emission Standards for Off-site Waste and Recovery Opera	ations (co	ntinued)	
	11.	The application area receives offsite materials with average VOHAP concentration less than 500 ppmw at the point of delivery that are not combined with materials having a VOHAP concentration of 500 ppmw or greater. <i>If the response to Question VIII.O.11 is "NO," go to Question VIII.O.14.</i>	YES	NO	
	12.	VOHAP concentration is determined by direct measurement.	YES	NO	
	13.	VOHAP concentration is based on knowledge of the off-site material.	YES	NO	
	14.	The application area includes an equipment component that is a pump, compressor, and agitator, pressure relief device, sampling connection system, open-ended valve or line, valve, connector or instrumentation system. <i>If the response to Question VIII.O.14 is "NO," go to Question VIII.O.17.</i>	YES	NO	
	15.	An equipment component in the application area contains or contacts off-site material with a HAP concentration greater than or equal to 10% by weight.	YES	NO	
	16.	An equipment component in the application area is intended to operate 300 hours or more during a 12-month period.	YES	NO	
	17.	The application area includes containers that manage non-exempt off-site material.	YES	NO	
	18.	The application area includes individual drain systems that manage non-exempt off-site materials.	YES	NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form O	Form OP-REQ1: Page 53					
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)					
P.	. Subj	part GG - National Emission Standards for Aerospace Manufacturing and Rev	vork Faci	lities		
	1.	The application area includes facilities that manufacture or rework commercial, civil, or military aerospace vehicles or components. If the response to Question VIII.P.1 is "NO" or "N/A," go to Section VIII.Q.	YES	⊠NO □N/A		
	2.	The application area includes one or more of the affected sources specified in 40 CFR § $63.741(c)(1) - (7)$.	YES	NO		
Q		part HH - National Emission Standards for Hazardous Air Pollutants From Oi luction Facilities.	l and Nat	ural Gas		
•	1.	The application area contains facilities that process, upgrade or store hydrocarbon liquids that are located at oil and natural gas production facilities prior to the point of custody transfer.	YES	NO		
•	2.	The application area contains facilities that process, upgrade or store natural gas prior to the point at which natural gas enters the natural gas transmission and storage source category or is delivered to a final end user. For SOP applications, if the responses to Questions VIII.Q.1 and VIII.Q.2 are both "NO," go to Section VIII.R. For GOP applications, if the responses to Questions VIII.Q.1 and VIII.Q.2 are both "NO," go to Section VIII.Z.	YES	NO		
•	3.	The application area contains only facilities that exclusively process, store or transfer black oil as defined in § 63.761. For SOP applications, if the response to Question VIII.Q.3 is "YES," go to Section VIII.R. For GOP applications, if the response to Question VIII.Q.3 is "YES," go to Section VIII.Z.	YES	NO		
•	4.	The application area is located at a site that is a major source of HAP. If the response to Question VIII.Q.4 is "NO," go to Question VIII.Q.6.	YES	NO		

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	Form OP-REQ1: Page 54					
VIII.	III. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)					
	Q.		part - HH - National Emission Standards for Hazardous Air Pollutants From (uction Facilities (continued)	Dil and Na	atural Gas	
•		5.	The application area contains only a facility, prior to the point of custody transfer, with facility-wide actual annual average natural gas throughput less than 18.4 thousand standard cubic meters (649,789.9 ft ³) per day and a facility- wide actual annual average hydrocarbon liquid throughput less than 39,700 liters (10,487.6 gallons) per day. <i>For SOP applications, if the response to Question VIII.Q.5 is "YES," go to</i> <i>Section VIII.R.</i> <i>For GOP applications, if the response to Question VIII.Q.5 is "YES," go to</i> <i>Section VIII.Z.</i> <i>For all applications, if the response to Question VIII.Q.5 is "NO," go to</i> <i>Question VIII.Q.9.</i>	YES	□NO	
•		6.	The application area includes a triethylene glycol (TEG) dehydration unit. For SOP applications, f the answer to Question VIII.Q.6 is "NO," go to Section VIII.R. For GOP applications, if the response to Question VIII.Q.6 is "NO," go to Section VIII.Z.	YES	NO	
•		7.	The application area is located at a site that is within the boundaries of UA plus offset or a UC, as defined in 40 CFR § 63.761.	YES	NO	
•		8.	The site has actual emissions of 5 tons per year or more of a single HAP, or 12.5 tons per year or more of a combination of HAP.	YES	NO	
•		9.	Emissions for major source determination are being estimated based on the maximum natural gas or hydrocarbon liquid throughput as calculated in § 63.760(a)(1)(i)-(iii).	YES	□NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	Form OP-REQ1: Page 55					
VIII.	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)					
	R.	Subp	part II - National Emission Standards for Shipbuilding and Ship Repair (Surfa	ce Coatir	ıg)	
		YES	NO			
		2.	Shipbuilding or ship repair operations located in the application area are subject to 40 CFR Part 63, Subpart II.	YES	NO	
	S.	Subp	part JJ - National Emission Standards for Wood Furniture Manufacturing Op	erations		
		1.	The application area includes wood furniture manufacturing operations and/or wood furniture component manufacturing operations. If the response to Question VIII.S.1 is "NO" or "N/A," go to Section VIII.T.	YES	×NO N/A	
		2.	The application area meets the definition of an "incidental wood manufacturer" as defined in 40 CFR § 63.801.	YES	NO	
	T.	Subp	part KK - National Emission Standards for the Printing and Publishing Indust	ry		
		1.	The application area includes publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses.	YES	NO N/A	
	U.	Subp	part PP - National Emission Standards for Containers			
		1.	The application area includes containers for which another 40 CFR Part 60, 61, or 63 subpart references the use of 40 CFR Part 63, Subpart PP for the control of air emissions. If the response to Question VIII.U.1 is "NO," go to Section VIII.V.	YES	NO	
		2.	The application area includes containers using Container Level 1 controls.	YES	NO	
		3.	The application area includes containers using Container Level 2 controls.	YES	NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-REQ1: Page 56						
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)					
-	U.	Subp	oart PP - National Emission Standards for Containers (continued)			
		4.	The application area includes containers using Container Level 3 controls.	YES	NO	
,	V.	Subp	oart RR - National Emission Standards for Individual Drain Systems			
		1.	The application area includes individual drain systems for which another 40 CFR Part 60, 61, or 63 subpart references the use of 40 CFR Part 63, Subpart RR for the control of air emissions.	YES	XNO	
	W.		oart YY - National Emission Standards for Hazardous Air Pollutants for Source eric Maximum Achievable Control Technology Standards	ce Catego	ories -	
		1.	The application area includes an acetal resins production process unit; an acrylic and modacrylic fiber production process unit complying with 40 CFR § 63.1103(b)(3)(i); or an existing polycarbonate production process.	YES	NO	
		2.	The application area includes process wastewater streams generated from an acetal resins production process unit; an acrylic and modacrylic fiber production process unit complying with 40 CFR § 63.1103(b)(3)(i); or an existing polycarbonate production process. If the responses to Questions VIII.W.1 and VIII.W.2 are both "NO," go to	YES	NO	
			Question VIII.W.20.			
		3.	The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 under the requirements of 40 CFR § 63.132(c).	YES	NO	
		4.	The application area includes process wastewater streams that are determined to be Group 2 under the requirements of 40 CFR § 63.132(c).	YES	NO	
		5.	All Group 1 wastewater streams at the site are determined to have a total source mass flow rate of less than 1 MG/yr.	YES	NO	
		6.	The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.W.6 is "NO," go to Question VIII.W.8.</i>	YES	□NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-	Form OP-REQ1: Page 57					
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)					
W.		part YY - National Emission Standards for Hazardous Air Pollutants for Sour eric Maximum Achievable Control Technology Standards (continued)	ce Catego	ories -		
	7.	The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	YES	NO		
	8.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	YES	NO		
	9.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.W.8 and W.9 are both "NO," go to Question</i> <i>VIII.W.11.</i>	YES	NO		
	10.	The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	YES	NO		
	11.	The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	YES	NO		
	12.	The application area includes individual drain systems that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. If the response to Question VIII.W.12 is "NO," go to Question VIII.W.15.	YES	NO		
	13.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of covers and, if vented, closed vent systems and control devices.	YES	NO		
	14.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	YES	NO		

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP	Form OP-REQ1: Page 58					
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)					
W.		Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)				
	15. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of an acetal resins production process unit; an acrylic and modacrylic fiber production process unit complying with 40 CFR § 63.1103(b)(3)(i); or an existing polycarbonate production process unit. <i>If the response to Question VIII.W.15 is "NO," go to Question VIII.W.20.</i>					
	 16. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that meet the criteria listed in 40 CFR § 63.1106(c)(1) - (3). <i>If the response to Question VIII.W.16 is "NO," go to Question VIII.W.20.</i> 		YES	□NO		
	17.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds meeting the definition of organic HAP in Table 9 to 40 CFR Part 60, Subpart G, at any flow rate.	YES	NO		
	18.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds meeting the definition of organic HAP in Table 9 to 40 CFR Part 60, Subpart G, at an annual average flow rate greater than or equal to 10 liters per minute.	YES	NO		

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP	Form OP-REQ1: Page 59					
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)					
W.	-	oart YY - National Emission Standards for Hazardous Air Pollutants for Source eric Maximum Achievable Control Technology Standards (continued)	ce Catego	ories -		
	19.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of an acrylic resins or acrylic and modacrylic fiber production process unit that is part of a new affected source or is a new affected source and the equipment conveys water with a total annual average concentration greater than or equal to 10 ppmw of compounds meeting the definition of organic HAP in Table 9 to 40 CFR Part 60, Subpart G, at an average annual flow rate greater than or equal to 0.02 liter per minute.	YES	□NO		
	20.	The application area includes an ethylene production process unit.	X YES	□NO □N/A		
	21.	The application area includes waste streams generated from an ethylene production process unit. If the responses to Questions VIII.W.20 and VIII.W.21 are both "NO" or "N/A," go to Question VIII.W.54.	X YES	□NO □N/A		
	22.	The waste stream(s) contains at least one of the chemicals listed in 40 CFR § 63.1103(e), Table 7(g)(1). <i>If the response to Question VIII.W.22 is "NO," go to Question VIII.W.54.</i>	YES	□NO		
	23.	Waste stream(s) are transferred off-site for treatment. <i>If the response to Question VIII.W.23 is "NO," go to Question VIII.W.25.</i>	YES	NO		
	24.	The application area has waste management units that treat or manage waste stream(s) prior to transfer off-site for treatment. If the response to Question VIII.W.24 is "NO," go to Question VIII.W.54.	YES	NO		

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-	Form OP-REQ1: Page 60					
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)					
W.		Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)				
	25.	The total annual benzene quantity from waste at the site is less than 10 Mg/yr as determined according to $40 \text{ CFR} $ § $61.342(a)$.	YES	NO		
	26.	The application area contains at least one waste stream that is a continuous butadiene waste stream as defined in 40 CFR § 63.1082(b). <i>If the response to Question VIII.W.26 is "NO," go to Question VIII.W.43.</i>	YES	NO		
	27.	The waste stream(s) contains at least 10 ppmw 1, 3-butadiene at a flow rate of 0.02 liters per minute or is designated for control. If the response to Question VIII.W.27 is "NO," go to Question VIII.W.43.	YES	NO		
	28.	The control requirements of 40 CFR Part 63, Subpart G for process wastewater as specified in 40 CFR § 63.1095(a)(2) are selected for control of the waste stream(s). <i>If the response to Question VIII.W.28 is "NO," go to Question VIII.W.33.</i>	YES	NO		
	29.	The application area includes containers that receive, manage, or treat a continuous butadiene waste stream.	YES	NO		
	30.	The application area includes individual drain systems that receive, manage, or treat a continuous butadiene waste stream. If the response to Question VIII.W.30 is "NO," go to Question VIII.W.43.	YES	NO		
	31.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	YES	NO		

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-	Form OP-REQ1: Page 61				
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)				
W.	Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)				
	32. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs. <i>If the response to Question VIII.W.32 is required, go to Question VIII.W.43.</i>				
	 33. The application area has containers, as defined in 40 CFR § 61.341, that receive a continuous butadiene waste stream. <i>If the response to Question VIII.W.33 is "NO," go to Question VIII.W.36.</i> 34. The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers. <i>If the response to Question VIII.W.34 is "YES," go to Question VIII.W.36.</i> 		YES	NO	
			YES	NO	
	35.	Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	YES	NO	
	36.	The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage a continuous butadiene waste stream. <i>If the response to Question VIII.W.36 is "NO," go to Question VIII.W.43.</i>	YES	NO	
	37.	The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. <i>If the response to Question VIII.W.37 is "YES," go to Question VIII.W.43.</i>	YES	NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-	Form OP-REQ1: Page 62				
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)				
W.	Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)				
	 38. The application area has individual drain systems complying with 40 CFR § 61.346(a). If the response to Question VIII.W.38 is "NO," go to Question VIII.W.40. 				
	39.	Covers and closed-vent systems used for individual drain systems operate such that the individual drain system is maintained at a pressure less than atmospheric pressure.	YES	□NO	
	40.	The application area has individual drain systems complying with 40 CFR § 61.346(b). If the response to Question VIII.W.40 is "NO," go to Question VIII.W.43.	YES	NO	
	41.	Junction boxes in the individual drain systems are equipped with a system to prevent the flow of organic vapors from the junction box vent pipe to the atmosphere during normal operation.	YES	NO	
	42.	Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device.	YES	NO	
	43.	The application area has at least one waste stream that contains benzene. If the response to Question VIII.W.43 is "NO," go to Question VIII.W.54.	X YES	NO	
	44.	The application area has containers, as defined in 40 CFR § 61.341, that receive a waste stream containing benzene. <i>If the response to Question VIII.W.44 is "NO," go to Question VIII.W.47.</i>	X YES	NO	
	45.	The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers. If the response to Question VIII.W.45 is "YES," go to Question VIII.W.47.	YES	XNO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	Form OP-REQ1: Page 63					
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)					
	W.	Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)				
		46.	Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	YES	NO	
		47.	The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage a waste stream containing benzene. <i>If the response to Question VIII.W.47 is "NO," go to Question VIII.W.54.</i>	⊠ YES	NO	
		48.	The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. <i>If the response to Question VIII.W.48 is "YES," go to Question VIII.W.54.</i>	YES	NO	
		49.	The application area has individual drain systems complying with 40 CFR § 61.346(a). If the response to Question VIII.W.49 is "NO," go to Question VIII.W.51.	XYES	NO	
		50.	Covers and closed-vent systems used for individual drain systems operate such that the individual drain system is maintained at a pressure less than atmospheric pressure.	YES	NO	
		51.	The application area has individual drain systems complying with 40 CFR § 61.346(b). If the response to Question VIII.W.51 is "NO," go to Question VIII.W.54.	YES	NO	
		52.	Junction boxes in the individual drain systems are equipped with a system to prevent the flow of organic vapors from the junction box vent pipe to the atmosphere during normal operation.	YES	NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP	Form OP-REQ1: Page 64					
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)					
W.		Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)				
	53.	Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device.	YES	NO		
	54.	The application area contains a cyanide chemicals manufacturing process. If the response to Question VIII.W.54 is "NO," go to Section VIII.X.	YES	NO		
	55.	The cyanide chemicals manufacturing process generates maintenance wastewater containing hydrogen cyanide or acetonitrile.	YES	NO		
X.	X. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins			IV		
	1.	The application area includes thermoplastic product process units, and/or their associated affected sources specified in 40 CFR § 63.1310(a)(1) - (5), that are subject to 40 CFR Part 63, Subpart JJJ. If the response to Question VIII.X.1 is "NO," go to Section VIII.Y.	YES	NO		
	2.	The application area includes thermoplastic product process units and/or wastewater streams and wastewater operations that are associated with thermoplastic product process units. <i>If the response to Question VIII.X.2 is "NO," go to Section VIII.Y.</i>	YES	NO		
	3.	All process wastewater streams generated or managed in the application area are from sources producing polystyrene. If the response to Question VIII.X.3 is "YES," go to Section VIII.Y.	YES	NO		
	4.	All process wastewater streams generated or managed in the application area are from sources producing ASA/AMSAN. <i>If the response to Question VIII.X.4 is "YES," go to Section VIII.Y.</i>	YES	□NO		

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-	Form OP-REQ1: Page 65				
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)				
X.	Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins (continued)				
	5.	The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 for organic HAPs as defined in 40 CFR § 63.1312.	YES	□NO	
	6.	The application area includes process wastewater streams, located at existing sources, that are Group 2 for organic HAPs as defined in 40 CFR § 63.1312.	YES	NO	
	7.	The application area includes process wastewater streams, located at new sources, that are Group 2 for organic HAPs as defined in 40 CFR § 63.1312.	YES	NO	
	8.	All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. If the response to Question VIII.X.8 is "YES," go to Question VIII.X.18.	YES	NO	
	9.	The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.X.9 is "NO," go to Question VIII.X.11.</i>	YES	NO	
	10.	The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	YES	NO	
	11.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	YES	NO	
	12.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.X.11 - VIII.X.12 are both "NO," go to Question VIII.X.14.</i>	YES	NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-	Form OP-REQ1: Page 66				
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)				
X.	Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins (continued)				
	13.	The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	YES []NO	
	Cont	tainers			
	14.	The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	YES []NO	
	Drains				
	 15. The application area includes individual drain systems that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. If the response to Question VIII.X.15 is "NO," go to Question VIII.X.18. 		YES []NO	
	16.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	YES []NO	
	17.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	YES [NO	
	18.	The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of an thermoplastic product process unit. <i>If the response to Question VIII.X.18 is "NO," go to Section VIII.Y.</i>	YES]NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-	Form OP-REQ1: Page 67					
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)					
Х.	-	Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins (continued)				
	Drai	ns (continued)				
	19.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that meet the criteria listed in 40 CFR § 63.149(d) and § 63.1330(b)(12). <i>If the response to Question VIII.X.19 is "NO," go to Section VIII.Y.</i>	YES	NO		
	20.	The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.1312, at any flow rate.	YES	NO		
	21.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.1312, at an annual average flow rate greater than or equal to 10 liters per minute.	YES	NO		
	22.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of an thermoplastic product process unit that is a new affected source or part of a new affected source and the equipment conveys water with a total annual average concentration greater than or equal to 10 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.1312, at an average annual flow rate greater than or equal to 0.02 liter per minute	YES	NO		

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	Form OP-REQ1: Page 68					
VIII	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)					
	Y.	-	oart UUU - National Emission Standards for Hazardous Air Pollutants for Pet lytic Cracking Units, Catalytic reforming Units, and Sulfur Recovery Units.	roleum R	efineries:	
		1.	The application area is subject to 40 CFR Part 63, Subpart UUU - National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic reforming Units, and Sulfur Recovery Units.	YES	NO	
	Z.		oart AAAA - National Emission Standards for Hazardous Air Pollutants for M te (MSW) Landfills.	lunicipal	Solid	
•		1.	The application area is subject to 40 CFR Part 63, Subpart AAAA - National Emission Standards for Hazardous Air Pollutants for Municipal Solid Waste Landfills.	YES	NO	
	AA.	-	part FFFF - National Emission Standards for Hazardous Air Pollutants for Mi anic Chemical Production and Processes (MON)	scellaneo	us	
	 The application area is located at a site that includes process units that manufacture as a primary product one or more of the chemicals listed in 40 CFR § 63.2435(b)(1). 			YES	NO	
		2.	The application area is located at a plant site that is a major source as defined in FCAA 112(a).	XYES	NO	
		3.	The application area is located at a site that includes miscellaneous chemical manufacturing process units (MCPU) that process, use or generate one or more of the organic hazardous air pollutants listed in § 112(b) of the Clean Air Act or hydrogen halide and halogen HAP. If the response to Question VIII.AA.1, AA.2 or AA.3 is "NO," go to Section VIII.BB.	YES	NO	
		4.	The application area includes process vents, storage vessels, transfer racks, or waste streams associated with a miscellaneous chemical manufacturing process subject to 40 CFR 63, Subpart FFFF. <i>If the response to Question VIII.AA.4 is "NO," go to Section VIII.BB.</i>	YES	NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-	Form OP-REQ1: Page 69				
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)				
AA.		part FFFF - National Emission Standards for Hazardous Air Pollutants for Mi anic Chemical Production and Processes (MON) (continued)	scellaneo	us	
	5.	The application area includes process wastewater streams. If the response to Question VIII.AA.5 is "NO," go to Question VIII.AA.18.	YES	□NO	
	6.	The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 for compounds listed in Table 8 of 40 CFR Part 63, Subpart G or Table 8 and Table 9, as appropriate, of 40 CFR Part 63, Subpart FFFF.	YES	NO	
	7.	The application area includes process wastewater streams that are Group 2 for compounds listed in Table 8 or Table 8 and Table 9, as appropriate, of 40 CFR Part 63, Subpart FFFF.	YES	NO	
	8.	All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. If the response to Question VIII.AA.8 is "YES," go to Section VIII.AA.22.	YES	NO	
	9.	The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.AA.9 is "NO," go to Question VIII.AA.11.</i>	YES	NO	
	10.	The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	YES	NO	
	11.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	YES	NO	
	12.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.AA.11 and VIII.AA.12 are both "NO," go to Question VIII.AA.18.</i>	YES	NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-REQ1: Page 70						
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)					
AA.	AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)					
	13.	Group 1 wastewater streams are transferred to an offsite treatment facility meeting the requirements of 40 CFR § 63.138(h). <i>If the response to Question VIII.AA.13 is "NO," go to Question VIII.AA.15.</i>	YES	NO		
	14.	The option to document in the notification of compliance status report that the wastewater will be treated in a facility meeting the requirements of 40 CFR § 63.138(h) is elected.	YES	NO		
	15.	Group 1 wastewater streams or residuals with a total annual average concentration of compounds in Table 8 of 40 CFR Part 63, Subpart FFFF less than 50 ppmw are transferred offsite. <i>If the response to Question VIII.AA.15 is "NO," go to Question VIII.AA.17.</i>	YES	NO		
	16.	The transferor is demonstrating that less than 5 percent of the HAP in Table 9 of 40 CFR Part 63, Subpart FFFF is emitted from waste management units up to the activated sludge unit.	YES	NO		
	17.	The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	YES	NO		
	18.	The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	YES	NO		
	19.	The application area includes individual drain systems that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream. If the response to Question VIII.AA.19 is "NO," go to Question VIII.AA.22.	YES	NO		
	20.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	YES	□NO		

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP	Form OP-REQ1: Page 71					
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)					
AA	AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscella Organic Chemical Production and Processes (MON) (continued)					
	21.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	YES	NO		
	22.	The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of a chemical manufacturing process unit that meets the criteria of 40 CFR § 63.100(b). <i>If the response to Question VIII.AA.22 is "NO," go to Section VIII.BB.</i>	YES	NO		
	23.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes (that are part of a miscellaneous chemical manufacturing process unit) that meet the criteria listed in 40 CFR § 63.149(d). If the response to Question VIII.AA.23 is "NO," go to Section VIII.BB.	YES	NO		
	24.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration of compounds in table 8 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 10,000 ppmw at any flow rate, and the total annual load of compounds in table 8 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 200 lb/yr.	YES	NO		
	25.	The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration of compounds in table 8 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 1,000 ppmw, and the annual average flow rate is greater than or equal to 1 liter per minute.	YES	NO		
	26.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of a chemical manufacturing process unit that is subject to the new source requirements of 40 CFR § 63.2445(a); and the equipment conveys water with a combined total annual average concentration of compounds in tables 8 and 9 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 30,000 ppmw, and the combined total annual load of compounds in tables 8 and 9 to this subpart is greater than or equal to 1 tpy.	YES	NO		

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	Form OP-REQ1: Page 72					
VIII.	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)					
	AA.	AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)				
	BB.	Subpart GGGG - National Emission Standards for Hazardous Air Pollutants for: Solvent Extractions for Vegetable Oil Production.				
		1.	The application area includes a vegetable oil production process that: is by itself a major source of HAP emissions or, is collocated within a plant site with other sources that are individually or collectively a major source of HAP emissions.	YES	NO	
	CC.	Subp	oart GGGGG - National Emission Standards for Hazardous Air Pollutants: Si	te Remed	iation	
	1. The application area includes a facility at which a site remediation is conducted. <i>If the answer to Question VIII.CC.1 is "NO," go to Section VIII.DD.</i>		YES	NO		
		2.	The application area is located at a site that is a major source of HAP. If the answer to Question VIII.CC.2 is "NO," go to Section VIII.DD.	YES	NO	
 § 63.7881(b)(1) through (6). <i>If the answer to Question VIII.CC.3 is "YES," go to Section VIII.DD.</i> 4. Prior to beginning site remediation activities it was determined that the t quantity of HAP listed in Table 1 of Subpart GGGGG that will be removed uring all site remediations will be less than 1 Mg/yr. 		YES	NO			
	Prior to beginning site remediation activities it was determined that the total quantity of HAP listed in Table 1 of Subpart GGGGG that will be removed during all site remediations will be less than 1 Mg/yr. If the answer to Question VIII.CC.4 is "YES," go to Section VIII.DD.	YES	NO			
		5.	The site remediation will be completed within 30 consecutive calendar days.	YES	NO	
	(6.	No site remediation will exceed 30 consecutive calendar days. If the answer to Question VIII.CC.6 is "YES," go to Section VIII.DD.	YES	NO	
		7.	Site remediation materials subject to 40 CFR Part 63, Subpart GGGGG are transferred from the application area to an off-site facility.	YES	NO	
		8.	All site remediation materials subject to 40 CFR Part 63, Subpart GGGGG are transferred from the application area to an off-site facility. <i>If the answer to Question VIII.CC.8 is "YES," go to Section VIII.DD.</i>	YES	NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-REQ1: Page 73						
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)						
CC.	C. Subpart GGGGG - National Emission Standards for Hazardous Air Pollutants: Site Remediation (continued)					
	9.	The application area includes containers that manage site remediation materials subject to 40 CFR Part 63, Subpart GGGGG. If the response to Question VIII.CC.9 is "NO," go to Question VIII.CC.14.	YES	NO		
	10.	The application area includes containers using Container Level 1 controls as specified in 40 CFR § 63.922(b).	YES	NO		
	11.	The application area includes containers with a capacity greater than 0.46 m^3 that meet the requirements of 40 CFR § 63.7900(b)(3)(i) and (ii).	YES	NO		
	12.	The application area includes containers using Container Level 2 controls as specified in 40 CFR § 63.923(b).	YES	NO		
	13.	The application area includes containers using Container Level 3 controls as specified in 40 CFR § 63.924(b).	YES	NO		
	14.	The application area includes individual drain systems complying with the requirements of 40 CFR § 63.962.	YES	NO		
DD.		oart YYYYY - National Emission Standards for Hazardous Air Pollutants for Arc Furnace Steelmaking Facilities	Area/Sou	rces:		
	1.	The application area includes an electric arc furnace (EAF) steelmaking facility, and the site is an area source of hazardous air pollutant (HAP) emissions. <i>If the response to Question VIII.DD.1 is "NO," go to Section VIII.EE.</i>	YES	NO		
	2.	The EAF steelmaking facility is a research and development facility. <i>If the response to Question VIII.DD.2 is "YES," go to Section VIII.EE.</i>	YES	NO		
	3.	Metallic scrap is utilized in the EAF.	YES	NO		
	4.	Scrap containing motor vehicle scrap is utilized in the EAF.	YES	NO		
	5.	Scrap not containing motor vehicle scrap is utilized in the EAF.	YES	NO		

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form OP-REQ1: Page 74						
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)					
EE.	EE. Subpart BBBBBB - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities					
	1.	The application area is located at a site that is an area source of HAPs. If the answer to Question EE.1 is "NO," go to Section VIII.FF.	YES	XNO		
	2.	The application area includes a pipeline breakout station, as defined in 40 CFR Part 63, Subpart BBBBBB, not subject to the control requirements of 40 CFR Part 63, Subpart R.	YES	NO		
	3.	The application area includes a pipeline pumping station as defined in 40 CFR Part 63, Subpart BBBBBB.	YES	□NO		
	4.	The application area includes a bulk gasoline plant as defined in 40 CFR Part 63, Subpart BBBBBB. <i>If the answer to Question VIII.EE.4 is "NO," go to Question VIII.EE.6.</i>	YES	NO		
	5.	The bulk gasoline plant was operating, prior to January 10, 2010, in compliance with an enforceable State, local or tribal rule or permit that requires submerged fill as specified in 40 CFR § 63.11086(a).	YES	□NO		
	6.	The application area includes a bulk gasoline terminal, as defined in 40 CFR Part 63, Subpart BBBBBB, not subject to the control requirements of 40 CFR Part 63, Subpart R or Subpart CC. <i>If the answer to Question VIII.EE.6 is "NO," go to Section VIII.FF.</i>	YES	NO		
	7.	The bulk gasoline terminal has throughput of less than 250,000 gallons per day. <i>If the answer to Question VIII.EE.7 is "YES," go to Section VIII.FF.</i>	YES	NO		
	8.	The bulk gasoline terminal loads gasoline into gasoline cargo tanks other than railcar cargo tanks.	YES	NO		
	9.	The bulk gasoline terminal loads gasoline into railcar cargo tanks. If the answer to Question VIII.EE.9 is "NO," go to Section VIII.FF.	YES	□NO		
	10.	The bulk gasoline terminal loads gasoline into railcar cargo tanks which do not collect vapors from a vapor balance system.	YES	NO		

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Forn	Form OP-REQ1: Page 75					
VIII.	7III. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)					
	EE.	E. Subpart BBBBBB - National Emission Standards for Hazardous Air Pollutants for Source Category Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities (continued)				
		11.	The bulk gasoline terminal loads gasoline into railcar cargo tanks which collect vapors from a vapor balance system and that system complies with a Federal, State, local, tribal rule or permit.	YES	NO	
	FF.		part CCCCCC - National Emission Standards for Hazardous Air Pollutants fo pline Dispensing Facilities	r Source	Category:	
•		1.	The application area is located at a site that is an area source of hazardous air pollutants. If the answer to Question VIII.FF.1 is "NO," go to Section VIII.GG.	YES	NO	
•		2.	The application area includes at least one gasoline dispensing facility as defined in 40 CFR § 63.11132. If the answer to Question VIII.FF.2 is "NO," go to Section VIII.GG.	YES	NO	
•		3.	The application area includes at least one gasoline dispensing facility with a monthly throughput of less than 10,000 gallons.	YES	NO	
•		4.	The application area includes at least one gasoline dispensing facility where gasoline is dispensed from a fixed gasoline storage tank into a portable gasoline tank for the on-site delivery and subsequent dispensing into other gasoline-fueled equipment.	YES	NO	
	GG.	Rece	ently Promulgated 40 CFR Part 63 Subparts			
•		1.	The application area is subject to one or more promulgated 40 CFR Part 63 subparts not addressed on this form. If the response to Question VIII.GG.1 is "NO," go to Section IX. A list of promulgated 40 CFR Part 63 subparts not otherwise addressed on OP-REQ1 is included in the instructions.	XYES	NO	
♦ Sut	opart X	2. (X, Su	Provide the Subpart designation (i.e. Subpart EEE) in the space provided below.	<u>.</u>		

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

Form	Form OP-REQ1: Page 76					
IX.	Title	Title 40 Code of Federal Regulations Part 68 (40 CFR Part 68) - Chemical Accident Prevention Provisions				
	A.	Applicability				
•		1.	The application area contains processes subject to 40 CFR Part 68, Chemical Accident Prevention Provisions, and specified in 40 CFR § 68.10.	X YES	NO	
X.	Title	40 Co	ode of Federal Regulations Part 82 (40 CFR Part 82) - Protection of Stratosphe	eric Ozon	e	
	А.	Subp	part A - Production and Consumption Controls			
•		1.	The application area is located at a site that produces, transforms, destroys, imports, or exports a controlled substance or product.	YES	⊠NO □N/A	
	B.	Subp	oart B - Servicing of Motor Vehicle Air Conditioners			
*		1.	Servicing, maintenance, and/or repair of fleet vehicle air conditioning systems using ozone-depleting refrigerants is conducted in the application area.	YES	NO	
	C.		oart C - Ban on Nonessential Products Containing Class I Substances and Ban lucts Containing or Manufactured with Class II Substances	on Nones	ssential	
*		1.	The application area sells or distributes one or more nonessential products (which release a Class I or Class II substance) that are subject to 40 CFR Part 82, Subpart C.	YES	⊠NO □N/A	
	D.	Subp	oart D - Federal Procurement			
•		1.	The application area is owned/operated by a department, agency, or instrumentality of the United States.	YES	⊠NO □N/A	
	E.	Subp	oart E - The Labeling of Products Using Ozone Depleting Substances			
•		1.	The application area includes containers in which a Class I or Class II substance is stored or transported prior to the sale of the Class I or Class II substance to the ultimate consumer.	YES	⊠NO □N/A	
*		2.	The application area is a manufacturer, importer, wholesaler, distributor, or retailer of products containing a Class I or Class II substance.	YES	XNO □N/A	
•		3.	The application area is a manufacturer, importer, wholesaler, distributor, or retailer of products manufactured with a process that uses a Class I or Class II substance.	YES	⊠NO □N/A	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For SOP applications, answer ALL questions unless otherwise directed.

Form	Form OP-REQ1: Page 77					
X.		e 40 Co tinued	ode of Federal Regulations Part 82 (40 CFR Part 82) - Protection of Stratosphe	eric Ozon	e	
	F.	. Subpart F - Recycling and Emissions Reduction				
•		1.	Servicing, maintenance, and/or repair on refrigeration and non-motor vehicle air condition appliances using ozone-depleting refrigerants or non-exempt substitutes is conducted in the application area.	XYES	NO	
•		2.	Disposal of appliances (including motor vehicle air conditioners) or refrigerant or non-exempt substitute reclamation occurs in the application area.	YES	⊠NO □N/A	
•		3.	The application area manufactures appliances or refrigerant recycling and recovery equipment.	YES	NO N/A	
	G.	Subp	oart G - Significant New Alternatives Policy Program			
•		1.	The application area manufactures, formulates, or creates chemicals, product substitutes, or alternative manufacturing processes that are intended for use as a replacement for a Class I or Class II compound. <i>If the response to Question X.G.1 is "NO" or "N/A," go to Section X.H.</i>	YES	NO N/A	
•		2.	All substitutes produced by the application area meet one or more of the exemptions in 40 CFR § $82.176(b)(1) - (7)$.	YES	□NO □N/A	
	H.	Subp	oart H -Halon Emissions Reduction			
•		1.	Testing, servicing, maintaining, repairing, or disposing of equipment containing halons is conducted in the application area.	YES	⊠NO □N/A	
•		2.	Disposal of halons or manufacturing of halon blends is conducted in the application area.	YES	NO N/A	
XI.	Mise	cellane	ous			
	A.	Requ	uirements Reference Tables (RRT) and Flowcharts			
		1.	The application area contains units that are potentially subject to a regulation for which the TCEQ has not developed an RRT and flowchart.	XYES	NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

For	Form OP-REQ1: Page 78					
XI.	Misc	cellaneous (continued)				
	B.	For	ns			
•		1.	The application area contains units that are potentially subject to a regulation for which the TCEQ has not developed a unit attribute form. <i>If the response to Question XI.B.1 is "NO" or "N/A," go to Section XI.C.</i>	⊠YES	□NO □N/A	
•		2.	Provide the Part and Subpart designation for the federal rule(s) or the Chapter, Su Division designation for the State regulation(s) in the space provided below.	bchapter,	and	
40 C	FR 63,	Subp	art XX and Subpart YY			
	C.	Emi	ssion Limitation Certifications			
•		1.	The application area includes units for which federally enforceable emission limitations have been established by certification.	XYES 🛛	□NO	
	D.		rnative Means of Control, Alternative Emission Limitation or Standard, or Eq uirements	uivalent		
		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	XNO	
		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. <i>If the response to Question XI.D.4 is "YES," please include a copy of the approval document with the application.</i>	XYES 🛛	NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

Form	Form OP-REQ1: Page 79						
XI.	Misc	iscellaneous (continued)					
	E.						
		1.	The application area includes emission units subject to the Acid Rain Program (ARP), including the Opt-In Program.	YES	NO		
		2.	The application area includes emission units qualifying for the new unit exemption under 40 CFR § 72.7.	YES	NO		
		3.	The application area includes emission units qualifying for the retired unit exemption under 40 CFR § 72.8.	YES	NO		
	F.		FR Part 97, Subpart EEEEE - Cross-State Air Pollution Rule (CSAPR) NO _X (up 2 Trading Program	Ozone Sea	ason		
		1.	The application area includes emission units subject to the requirements of the CSAPR NO _X Ozone Season Group 2 Trading Program. If the response to Question XI.F.1 is "NO," go to Question XI.F.7.	YES	NO		
		2.	The application area includes units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart H for NO _X and heat input.	YES	NO		
		3.	The application area includes gas or oil-fired units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart H for NO_X , and the monitoring requirements of 40 CFR Part 75, Appendix D for heat input.	YES	□NO		
		4.	The application area includes gas or oil-fired peaking units that are complying with the monitoring requirements of 40 CFR Part 75, Appendix E for NO _X , and the monitoring requirements of 40 CFR Part 75, Appendix D for heat input.	YES	□NO		
		5.	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 NO_X and heat input.	YES	□NO		
		6.	The application area includes units that are complying with EPA-approved alternative monitoring system requirements of 40 CFR Part 75, Subpart E for NO_X and heat input.	YES	□NO		
		7.	The application area includes emission units that qualify for the CSAPR NO _X Ozone Season Group 2 retired unit exemption.	YES	NO		

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

Form	Form OP-REQ1: Page 80					
XI.	Misc	Miscellaneous (continued)				
	G.					
		1.	The application area includes emission units complying with the requirements of the Texas SO ₂ Trading Program.	YES	NO	
			If the response to Question XI.G.1 is "NO," go to Question XI.G.6.			
		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.	Perm	it 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.	XYES	NO	

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

Form	Form OP-REQ1: Page 81						
XI.	Misc	cellane	cous (continued)				
	I.	GOP	• Type (Complete this section for GOP applications only)				
•		1.	The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under GOP No. 511 - Oil and Gas General Operating Permit for Brazoria, Chambers, Collin, Dallas, Denton, El Paso, Ellis, Fort Bend, Galveston, Hardin, Harris, Jefferson, Johnson, Kaufman, Liberty, Montgomery, Orange, Parker, Rockwall, Tarrant, Waller, and Wise Counties.	YES	□NO		
•		2.	The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under GOP No. 512 - Oil and Gas General Operating Permit for Gregg, Nueces, and Victoria Counties.	YES	NO		
•		3.	The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under GOP No. 513 - Oil and Gas General Operating Permit for Aransas, Bexar, Calhoun, Matagorda, San Patricio, and Travis Counties.	YES	NO		
•		4.	The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under GOP No. 514 - Oil and Gas General Operating Permit for All Texas Counties Except Aransas, Bexar, Brazoria, Calhoun, Chambers, Collin, Dallas, Denton, El Paso, Ellis, Fort Bend, Galveston, Gregg, Hardin, Harris, Jefferson, Johnson, Kaufman, Liberty, Matagorda, Montgomery, Nueces, Orange, Parker, Rockwall, San Patricio, Tarrant, Travis, Victoria, Waller, and Wise County.	YES	NO		
•		5.	The application area is applying for initial issuance, revision, or renewal of a solid waste landfill general operating permit under GOP No. 517 - Municipal Solid Waste Landfill general operating permit.	YES	NO		
	J.	Title	30 TAC Chapter 101, Subchapter H				
•		1.	The application area is located in a nonattainment area. If the response to Question XI.J.1 is "NO," go to question XI.J.3.	YES	XNO		
•		2.	The applicant has or will generate emission reductions to be credited in the TCEQ Emissions Banking and Trading Program.	YES	□NO □N/A		
•		3.	The applicant has or will generate discrete emission reductions to be credited in the TCEQ Emissions Banking and Trading Program.	YES	⊠NO □N/A		

Date:	01/17/2024		
Permit No.:	O-2551		
RN No.:	RN100216977		

Form	Form OP-REQ1: Page 82					
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 .	YES	NO	
•		5.	The application area includes an electric generating facility permitted under 30 TAC Chapter 116, Subchapter I.	YES	⊠NO	
•		6.	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	
•		7.	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.	Perio	odic Monitoring	•		
•		1.	The applicant or permit holder is submitting at least one periodic monitoring proposal described on Form OP-MON in this application.	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.	XYES	□NO	
•		3.	All periodic monitoring requirements are being removed from the permit with this application.	YES	XNO	

Date:	01/17/2024		
Permit No.:	O-2551		
RN No.:	RN100216977		

Form	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. <i>If the response to Question XI.L.1 is "NO," go to Section XI.M.</i>	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.	XYES	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 sub implementation plan and schedule in the space below.	mitting a	CAM	
•		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). <i>If the response to Question XI.L.8 is "YES," go to Section XI.M.</i>	YES	⊠NO	

Date:	01/17/2024		
Permit No.:	O-2551		
RN No.:	RN100216977		

Form	Form OP-REQ1: Page 84						
XI.	Misc	Miscellaneous (continued)					
	L.	Com	pliance Assurance Monitoring (continued)				
•		9.	At least one of the CAM proposals as described by question XI.L.3 or XI.L.4 addresses particulate matter, and the emission unit has a capture system as defined in 40 CFR §64.1.	⊠YES	NO		
•		10.	At least one of the CAM proposals as described by question XI.L.3 or XI.L.4 addresses VOC, and the emission unit has a capture system as defined in 40 CFR §64.1.	XYES X	□NO		
•		11.	At least one of the CAM proposals as described by question XI.L.3 or XI.L.4 addresses a regulated pollutant other than particulate matter or VOC, and the emission unit has a capture system as defined in 40 CFR §64.1.	YES	NO		
•		12.	The control device in the CAM proposal as described by question XI.L.3 or XI.L.4 has a bypass.	YES	NO		
	М.	Title	30 TAC Chapter 113, Subchapter D, Division 5 - Emission Guidelines and Co	mpliance	Times		
•		1.	The application area includes at least one air curtain incinerator that commenced construction on or before December 9, 2004. If the response to Question XI.M.1 is "NO," or "N/A," go to Section XII.	YES	⊠NO □N/A		
•		2.	All air curtain incinerators constructed on or before December 9, 2004 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	YES	NO		
XII.	New	Sourc	ee Review (NSR) Authorizations	•			
	A.	Was	te Permits with Air Addendum				
•		1.	The application area includes a Municipal Solid Waste Permit or an Industrial Hazardous Waste with an Air Addendum. If the response to XII.A.1 is "YES," include the waste permit numbers and issuance date in Section XII.J.	YES	NO		

Date:	01/17/2024		
Permit No.:	O-2551		
RN No.:	RN100216977		

Forn	Form OP-REQ1: Page 85						
XII.	II. 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	XYES	NO		
•		2.	Section XII.H and answer XII.B.2 - B.16 as appropriate. 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	XNO		
•		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	XNO		
		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		

Date:	01/17/2024		
Permit No.:	O-2551		
RN No.:	RN100216977		

Form	Form OP-REQ1: Page 86						
XII.	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. <i>If the response to XII.B.12 is "NO," go to Question XII.B.15.</i>	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	МNО		
	D.	Mult	tiple Plant Permits				
		1.	The application area includes at least one Multi-Plant Permit NSR authorization.	YES	NO		

Date:	01/17/2024		
Permit No.:	O-2551		
RN No.:	RN100216977		

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

Form OP-REQ1: Page 87							
XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)							
E. PSD Permits and PSD Major Pollutants							
PSD Permit No.: GHGPSDTX3	* Issuance Date: 08/24/	Issuance Date: 08/24/2012 Polluta					
PSD Permit No.: PSDTX903M5	5 Issuance Date: 08/10/	/2023	Pollutant(s): VOC, NC	Dx, CO, PM, HAPS			
PSD Permit No.:	Issuance Date:		Pollutant(s):				
PSD Permit No.:	Issuance Date:		Pollutant(s):				
If PSD Permits are held for the Technical Forms heading at: y							
F. Nonattainment (N	NA) Permits and NA Major	Pollutan	its				
NA Permit No.: N007M1	Issuance Date: 08/10/	/2023	Pollutant(s): VOC, NC)x			
NA Permit No.:	Issuance Date:		Pollutant(s):				
NA Permit No.:	Issuance Date:	Issuance Date:		Pollutant(s):			
NA Permit No.:	Issuance Date:	Issuance Date:		Pollutant(s):			
If NA Permits are held for the a Technical Forms heading at:							
G. NSR Authorizatio	ons with FCAA § 112(g) Red	quiremen	nts				
NSR Permit No.: 36644	Issuance Date: 08/10/2023	NSR Per	rmit No.:	Issuance Date:			
NSR Permit No.:	Issuance Date:	NSR Per	rmit No.:	Issuance Date:			
NSR Permit No.:	Issuance Date:	NSR Per	rmit No.:	Issuance Date:			
NSR Permit No.:	Issuance Date:	NSR Permit No.:		Issuance Date:			
	apter 116 Permits, Special P mits By Rule, PSD Permits,						
Authorization No.: AMOC 220+	Issuance Date: 04/28/2023	Authoriz	zation No.:	Issuance Date:			
Authorization No.:	Issuance Date:	Authoriz	zation No.:	Issuance Date:			
Authorization No.:	Issuance Date:	Authoriz	zation No.:	Issuance Date:			
Authorization No.:	Issuance Date:	Authoriz	zation No.:	Issuance Date:			

*For reference, EPA Issued Permit PSD-TX-903-GHG has been assigned TCEQ permit number GHGPSDTX3.

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

Date:	01/17/2024
Permit No.:	O-2551
RN No.:	RN100216977

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

Form OP-REQ1: Page 88				
XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)				
♦ I. Permits by Rule (30 TAC	I. Permits by Rule (30 TAC Chapter 106) for the Application Area			
A list of selected Permits by Rule (prev FOP application is available in the ins	iously referred to as standard exemptions) that are required to be listed in the tructions.			
PBR No.: 106.261	Version No./Date: 09/04/2000			
PBR No.: 106.261	Version No./Date: 11/1/2003			
PBR No.: 106.262	Version No./Date: 9/4/2000			
PBR No.: 106.262	Version No./Date: 11/1/2003			
PBR No.: 106.263	Version No./Date: 11/1/2001			
PBR No.: 106.371	Version No./Date: 9/4/2000			
PBR No.: 106.454	Version No./Date: 9/4/2000			
PBR No.: 106.472	Version No./Date: 9/4/2000			
PBR No.: 106.473	Version No./Date: 9/4/2000			
PBR No.: 106.478	Version No./Date: 9/4/2000			
PBR No.:	Version No./Date:			
PBR No.:	Version No./Date:			
PBR No.:	Version No./Date:			
PBR No.:	Version No./Date:			
PBR No.:	Version No./Date:			
PBR No.:	Version No./Date:			
J. Municipal Solid Waste and Industrial Hazardous Waste Permits With an Air Addendum				
Permit No.:	Issuance Date:			
Permit No.:	Issuance Date:			
Permit No.:	Issuance Date:			
Permit No.:	Issuance Date:			

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

Date	Permit No.	Regulated Entity No.
1/17/2024	O-2551	100216977

	Revision	Unit/C	Group/Process	Potentially Applicable	Negative	Negative Applicability/Superseded
Unit AI	No.	ID No.	Applicable Form	Regulatory Name	Applicability/Superseded Requirement Citation	Requirement Reason
А	9	T-5702	OP-2 OP-REQ2	NSPS NNN	§63.110(d)(4) §63.1100(g)(2)(ii)	Group 1 process vent subject to 40 CFR Part 63, Subpart G and 40 CFR Part 60, Subpart NNN, must comply with 40 CFR, Part 63, Subpart G. Process Vent subject to MACT YY and NSPS NNN are required to comply with process vent requirements of MACT YY.
A	10	R-2501X	OP-2 OP-REQ2	NSPS RRR	60.700(a)	The source does not produce any products listed in NSPS RRR. In addition, this source is not a process vent, but rather a wastewater treatment vent subject to 40 CFR 63, Part YY as it is part of Unit ID HONWWTP.
А	18	TK-2501B	OP-2 OP-REQ2	NSPS Kb	\$60.110b(b)	This source has a capacity greater than 39,890 gallons (151 m ³) and stores a liquid with a maximum true vapor pressure less than 0.5 psia (3.5 kPa).
А	19	TK-2501	OP-2 OP-REQ2	NSPS Kb	§60.110b(b)	This source has a capacity greater than 39,890 gallons (151 m ³) and stores a liquid with a maximum true vapor pressure less than 0.5 psia (3.5 kPa).
A	35	T280047	OP-2 OP-SUMR	NSPS Kb	§60.110b(a)	This source has a capacity of less than 19,800 gallons (75 m^3).
A	36	TK-1501	OP-2 OP-SUMR OP-UA3 OP-REQ2	NSPS Kb	§60.110b(a)	This source has a capacity of less than 19,800 gallons (75 m ³).
A	37	TK-2210	OP-2 OP-SUMR OP-UA3 OP-REQ2	NSPS Kb	§60.110b(a)	This source has a capacity of less than 19,800 gallons (75 m ³).

TCEQ-10017 (APD-ID156v2.0, Revised 07/22) Form OP-REQ2 - Negative Applicable/Superseded Requirement Determinations This form for use by facilities subject to air quality permit requirements and

may be revised periodically (Title V Release 10/07)

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

Date	Permit No.	Regulated Entity No.
1/17/2024	O-2551	100216977

	Revision	Unit/C	Group/Process	Potentially Applicable	Negative	Negative Applicability/Superseded
Unit AI	No.	ID No.	Applicable Form	Regulatory Name	Applicability/Superseded Requirement Citation	Requirement Reason
A	38	ТК-2620	OP-2 OP-SUMR OP-UA3 OP-REQ2	NSPS Kb	§60.110b(a)	This source has a capacity of less than 19,800 gallons (75 m ³).
A	39	ТК-4020	OP-2 OP-SUMR OP-UA3 OP-REQ2	NSPS Kb	§60.110b(a)	This source has a capacity of less than 19,800 gallons (75 m ³).
A	40	T241176	OP-2 OP-SUMR OP-UA3 OP-REQ2	NSPS Kb	§60.110b(a)	This source has a capacity of less than 19,800 gallons (75 m ³).

VI. New Source Review Form

The following form is required to summarize any Permit By Rule authorizations:

1. OP-PBRSUP: PERMIT BY RULE SUPPLEMENTAL TABLE

Permit By Rule Supplemental Table (Page 1) Table A: Registered Permits by Rule (30 TAC Chapter 106) for the Application Area Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
01/17/2024	0-2551	RN100216977

Unit ID No.	Registration No.	PBR No.	Registration Date
F-1	160345	106.261	03/16/2020
F-1	160348	106.261 / 106.262	03/25/2020
F-4	160348	106.261 / 106.262	03/25/2020
AH-009A	160348	106.261 / 106.262	03/25/2020
N-15 and N-15A	160348	106.261 / 106.262	03/25/2020
AH-006	164240	106.261 / 106.262	03/09/2021
AH-008	164240	106.261 / 106.262	03/09/2021
AH-010	164240	106.261 / 106.262	03/09/2021
F-1	167920	106.261/106.262	3/11/2022
F-1	169666	106.261	8/3/2022, 03/22/2023, 09/07/2023

Permit By Rule Supplemental Table (Page 1) Table A: Registered Permits by Rule (30 TAC Chapter 106) for the Application Area Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
01/17/2024	O-2551	RN100216977

Unit ID No.	Registration No.	PBR No.	Registration Date
MSS CAP	169666	106.263	8/3/2022, 03/22/2023, 09/07/2023
N-15 / N-15A	170435	106.261	10/07/2022
F-1	172347	106.261	06/21/2023

Permit By Rule Supplemental Table (Page 2) Table B: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for the Application Area Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
01/17/2024	O-2551	RN100216977

Unit ID No.	PBR No.	Version No./Date
DSL-TK	106.473	9/4/2000
F-2A	106.371	9/4/2000
MOD18	106.454	9/4/2000
TK-1701	106.478	9/4/2000
TK-1702	106.472	9/4/2000
TK-1703	106.472	9/4/2000
TK-1704	106.478	9/4/2000
TK-2501B	106.262 106.478	11/1/2003 9/4/2000
T270596	106.472	9/4/2000
TK-7401	106.472	9/4/2000
TK-7601	106.472	9/4/2000

Permit By Rule Supplemental Table (Page 2) Table B: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for the Application Area Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
01/17/2024	O-2551	RN100216977

Unit ID No.	PBR No.	Version No./Date
TK-2493	106.472	9/4/2000
TK-2491	106.472	9/4/2000
TK-9604	106.472	9/4/2000
TK-9801	106.472	9/4/2000
TK-5273	106.472	9/4/2000
ТК-5273Х	106.472	9/4/2000
T233674	106.371	9/4/2000
T233676	106.371	9/4/2000
T113596	106.472	9/4/2000
T131632	106.371	9/4/2000
T280047	106.371	9/4/2000

Permit By Rule Supplemental Table (Page 2) Table B: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for the Application Area Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
01/17/2024	O-2551	RN100216977

Unit ID No.	PBR No.	Version No./Date
TK-1501	106.472	9/4/2000
TK-2620	106.472	9/4/2000
TK-4020	106.472	9/4/2000
T241176	106.472	9/4/2000
SDBZWD	106.227	9/4/2000
TMPENG	106.511	9/4/2000
SWPD	106.532	9/4/2000
SWWP	106.532	9/4/2000

Permit By Rule Supplemental Table (Page 3) Table C: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for Insignificant Sources for the Application Area Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
01/17/2024	0-2551	RN100216977

PBR No.	Version No./Date
106.102	9/4/2000
106.316	9/4/2000

Date	Permit Number	Regulated Entity Number
01/17/2024	O-2551	RN100216977

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
F-1	106.261	160345	Components are monitored per the site's leak detection and repair program.
F-1	106.261 / 106.262	160348	Components are monitored per the site's leak detection and repair program.
F-4	106.261 / 106.262	160348	Components are monitored per the site's leak detection and repair program.
АН-009А	106.261 / 106.262	160348	Monthly emissions calculations using measured process conditions.
N-15 and N-15A	106.261 / 106.262	160348	Monthly emissions calculations using measured process conditions.
АН-006	106.261 / 106.262	164240	Monthly emissions calculations using measured process conditions.
AH-008	106.261 / 106.262	164240	Monthly emissions calculations using measured process conditions.
AH-010	106.261 / 106.262	164240	Monthly emissions calculations using measured process conditions.
F-1	106.261 / 106.262	167920	Components are monitored per the site's leak detection and repair program.
F-1	106.261	169666	Components are monitored per the site's leak detection and repair program.
MSS CAP	106.263	169666	Maintain a record of the maintenance activity and associated emissions.

Date	Permit Number	Regulated Entity Number
01/17/2024	0-2551	RN100216977

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
N-15 / N-15A	106.261	170435	Monthly emission calculations using measured process conditions.
F-1	106.261	172347	Components are monitored per the site's leak detection and repair program.
DSL-TK	106.473	9/4/2000	Maintain a record of the material stored, loading rate, tank capacity, monthly emissions.
F-2A	106.371	9/4/2000	Maintain a record of cooling tower circulation rate.
MOD18	106.454	9/4/2000	Maintain a record of solvent used and the total solvent makeup per year.
TK-1701	106.478	9/4/2000	Maintain a record of the material stored, maximum true vapor pressures and associated emission calculations.
TK-1702	106.472	9/4/2000	Maintain a record of the material stored.
TK-1703	106.472	9/4/2000	Maintain a record of the material stored.
TK-1704	106.478	9/4/2000	Maintain a record of the material stored, maximum true vapor pressures and associated emission calculations.
TK-2501B	106.262	11/1/2003	Monthly emission calculations using measured process conditions.
TK-2501B	106.478	9/4/2000	Maintain a record of the material stored, maximum true vapor pressures and associated emission calculations.

Date	Permit Number	Regulated Entity Number
01/17/2024	O-2551	RN100216977

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
T270596	106.472	9/4/2000	Maintain a record of the material stored.
TK-7401	106.472	9/4/2000	Maintain a record of the material stored.
TK-7601	106.472	9/4/2000	Maintain a record of the material stored.
TK-2493	106.472	9/4/2000	Maintain a record of the material stored.
TK-2491	106.472	9/4/2000	Maintain a record of the material stored.
TK-9604	106.472	9/4/2000	Maintain a record of the material stored.
TK-9801	106.472	9/4/2000	Maintain a record of the material stored.
TK-5273	106.472	9/4/2000	Maintain a record of the material stored.
TK-5273X	106.472	9/4/2000	Maintain a record of the material stored.
T233674	106.371	9/4/2000	Maintain a record of the use for the material stored.
T233676	106.371	9/4/2000	Maintain a record of the use for the material stored.
T113596	106.472	9/4/2000	Maintain a record of the material stored.
T131632	106.371	9/4/2000	Maintain a record of the use for the material stored.

Date	Permit Number	Regulated Entity Number
01/17/2024	O-2551	RN100216977

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
T280047	106.371	9/4/2000	Maintain a record of the use for the material stored.
TK-1501	106.472	9/4/2000	Maintain a record of the material stored.
TK-2620	106.472	9/4/2000	Maintain a record of the material stored.
TK-4020	106.472	9/4/2000	Maintain a record of the material stored.
T241176	106.472	9/4/2000	Maintain a record of the material stored.
SDBZWD	106.227	9/4/2000	Maintain a record of material used.
TMPENG	106.511	9/4/2000	Maintain records of hours of operation.
SWPD	106.532	9/4/2000	Maintain a record of the function of the wastewater treatment system.
SWWP	106.532	9/4/2000	Maintain a record of the function of the wastewater treatment system.

APPENDIX

Jon Niermann, *Chairman* Emily Lindley, *Commissioner* Bobby Janecka, *Commissioner* Erin E. Chancellor, *Interim Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

RETURN RECEIPT REQUESTED

April 28, 2023

MR JOHN LYCAN VICE PRESIDENT PORT ARTHUR SITE BASF TOTALENERGIES PETROCHEMICALS LLC PO BOX 2506 PORT ARTHUR TX 77643-2506

Re: Alternative Method of Control (AMOC) No. 220 Multipoint Ground Flare Chapter 115 Alternative Control Regulated Entity Number: RN100216977 Customer Reference Number: CN604166967 Associated Permit Numbers: 36644, PSDTX903M5, PSDGHGTX903, N007M1 and O2551

Dear Mr. Lycan:

This correspondence is in response to BASF TOTALEnergies Petrochemicals LLC's (BASF's) January 27, 2023 request to use a high-pressure multipoint ground flare (MPGF) to control emissions from streams regulated under 30 TAC Chapter 115 Subchapter B: Division 2 Vent Gas Control and Division 6: Batch Processes through the AMOC process in §§ 115.910-916.

The MPGF system provides safe control of hydrocarbon vapor streams that may result from upsets and emergency events or planned maintenance, startup and shutdown (MSS) activities. We also understand the high-pressure operations of the MPGF will not meet the tip velocity requirements of 40 CFR §60.18. Based on the review of the information submitted, performance testing demonstrates proper flare operation, cross-lighting, flame stability, smokeless operation, and greater than 98% destruction rate effectiveness (DRE) is expected for the high-pressure operations of the MPGF system.

The Texas Commission on Environmental Quality (TCEQ) Executive Director has made a final decision to approve your AMOC request. The conditions upon which the MPGF system is approved are attached to this correspondence. Please maintain these conditions along with all related records.

The TCEQ has been delegated authority to enforce the above cited standards and is authorized to approve this AMOC. 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 in accordance with 30 TAC Chapter 115.

This AMOC approval may supersede certain requirements or representations in Permit Nos. 36644, PSDTX903M5, PSDGHGTX903, N007M1. To ensure effective and consistent enforceability, we request that BASF 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) O2551. 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.

P.O. Box 13087 • Austin, Texas 78711-3087 • 512-239-1000 • tceq.texas.gov

April 28, 2023 Page 2 MR JOHN LYCAN

Re: Permit Numbers: 79052, GHGPSDTX3, N018M2, PSDTX903M5, and O2551

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.

Sincerely,

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

cc: Air Section Manager, Region 10 - Beaumont

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: 353029