

**From:** Mark Meyer  
**Sent:** Monday, January 13, 2025 5:16 PM  
**To:** Stuart L. Keil, P.E.  
**Cc:** John Branom; Michael Mayo [MTMA]; Stuart Keil. P.E.  
**Subject:** RE: STEERS Title V Application Submittal (Update)

Good evening,

Received and all information acknowledged, including the explanation of the NO<sub>x</sub> major source status and the STEERS submittal. Appreciated.

I will submit the project for QAQC and then submit for the Public Announcement package issuance.

You are welcome and thank you.

Mark Meyer  
Air Permits Division - Operating Permits  
Texas Commission on Environmental Quality  
512.239.0445

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**From:** Stuart L. Keil, P.E. <keil@flash.net>  
**Sent:** Monday, January 13, 2025 5:01 PM  
**To:** Mark Meyer <Mark.Meyer@tceq.texas.gov>  
**Cc:** R6AirPermitsTX <R6AirPermitsTX@epa.gov>; Dr. Latrice Babin <latrice.babin@pcs.hctx.net>; Air Permits <Air\_Permits@pcs.hctx.net>; Martha O'Daniel <modaniel@pasadenatx.gov>; John Branom <JBR@topsoe.com>; Michael Mayo [MTMA] <MTMA@topsoe.com>; Stuart Keil. P.E. <stuartlkeil@gmail.com>  
**Subject:** Re: STEERS Title V Application Submittal (Update)

Mark, thank you for the opportunity to review the draft permit conditions. Topsoe accepts these conditions as proposed.

A STEERS package with the updated Form OP-REQ1 page 89 was submitted today, as indicated by the email below. Also, a Form OP-CRO1 was provided, which is a slight duplication of the STEERS certification.

A copy of record for the submittal is attached.

You had asked about the recent determination of the site as a major source for NO<sub>x</sub>. That determination occurred as a result of the recent re-designation of the nonattainment status for the HGB area. Since the site has a potential of about 34 tons/yr on NO<sub>x</sub>, it now exceeds the current 25 tons/yr major source threshold.

Thanks for your help in finalizing this permit process.

On 1/13/2025 2:13 PM, [steers@tceq.texas.gov](mailto:steers@tceq.texas.gov) wrote:

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

Your application was successfully submitted and received by the TCEQ at 01/13/2025 02:13 PM.

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 745011.

The Area ID for this submittal is 1217.

The Project ID for this submittal is 37149.

The STEERS confirmation number for this submittal is 618386.

The hash code for this submittal is  
51135A0FC180EC5D2C7E5D93E7288D736085C9F1D12A116731400E3DDF39E047.

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 e-mail at [airperm@tceq.texas.gov](mailto:airperm@tceq.texas.gov).

**From:** Mark Meyer  
**Sent:** Monday, January 6, 2025 7:04 PM  
**To:** keil@flash.net; stuartkeil@gmail.com  
**Cc:** John Richard Branom [JBR]  
**Subject:** RE: SOP Minor Revision Application for Topsoe, Inc. and the HTI Bayport Facility (Project 37149, Permit O1217)  
**Attachments:** WDP - O1217 Topsoe, Inc. (Minor, 37149)\_To Applicant v1\_01062025.docx

Good evening,

I have completed the technical review of the submitted minor revision application for Topsoe, Inc. and the HTI Bayport Facility (Project 37149, Permit O1217). Attached, please find the Working Draft Permit (WDP) for your review and approval, and/or comments.

The only change should be the indicated issuance date of NSR 9203, which is now 11/15/2024.

Please review and provide the following at your earliest opportunity, but please no later than COB on Tuesday, 1/14/2025:

1. Your approval and/or comments to the attached WDP;
2. An OP-0REQ1 page 89 (per the most recent version dated 09/24) indicating the current issuance dates of NSR Nos. 9203 (11/15/2024) and 21178 (4/19/2023); and
3. If there are no comments that will require changes to the WDP, a final OP-CRO1 certifying the OP-REQ1 submittal.

From previous projects, it is understood that submittal of the requested OP-REQ1 page 89 via STEERS will constitute your approval of the WDP.

Please advise upon submittal of the STEERS action so that I can ensure I receive the info in a timely manner.

Upon receipt of the STEERS submittal, I will finalize the public announcement package and route for issuance.

Please do not hesitate to contact me should you have any questions.

Thank you.

Mark Meyer  
Air Permits Division - Operating Permits  
Texas Commission on Environmental Quality  
512.239.0445

How is our customer service? Fill out our online customer satisfaction survey at [www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

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**From:** Mark Meyer  
**Sent:** Monday, January 6, 2025 4:59 PM  
**To:** 'keil@flash.net' <keil@flash.net>; 'stuartkeil@gmail.com' <stuartkeil@gmail.com>  
**Cc:** 'John Richard Branom [JBR]' <JBR@topsoe.com>  
**Subject:** SOP Minor Revision Application for Topsoe, Inc. and the HTI Bayport Facility (Project 37149, Permit O1217)

Good evening,

I have been assigned the submitted SOP Minor Revision application for Topsoe, Inc. and the HTI Bayport Facility (Permit O1217). The application has been assigned Project No. 37149 and was submitted via STEERS on 9/16/2024 as a new application.

Per the submittal information and documentation, the only change is updating the issuance date of NSR No. 9203 per the recent amendment which was issued 11/15/2024 (Project 379849).

As I finalize the Working Draft Permit (WDP) to send for your review and approval, I did notice the submitted OP-2 indicates the site is now major for NO<sub>x</sub>. In all of the most recent Title V actions, the site was no longer major for any pollutants due to changes at the site. Please confirm the site is now major for NO<sub>x</sub> and advise on the timeframe of when this change occurred.

I expect to have the WDP provided within the next week.

As always, I look forward to working with you during the review process. Please do not hesitate to contact me at any time should you have any questions.

Thank you.

Mark Meyer  
Air Permits Division - Operating Permits  
Texas Commission on Environmental Quality  
P.O. Box 13087, MC 163  
Austin, TX 78711-3087  
512.239.0445  
[mark.meyer@tceq.texas.gov](mailto:mark.meyer@tceq.texas.gov)

Please consider whether it is necessary to print this e-mail



How is our customer service? Fill out our online customer satisfaction survey at [www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

**Texas Commission on Environmental Quality**

Title V Existing

1217

**Site Information (Regulated Entity)**

What is the name of the permit area to be authorized?	HTI BAYPORT
Does the site have a physical address?	Yes
Physical Address	
Number and Street	10010 BAYPORT BLVD
City	PASADENA
State	TX
ZIP	77507
County	HARRIS
Latitude (N) (##.#####)	29.610555
Longitude (W) (-###.#####)	95.059166
Primary SIC Code	2819
Secondary SIC Code	
Primary NAICS Code	325188
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN101211498
What is the name of the Regulated Entity (RE)?	HALDOR TOPSOE
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	10010 BAYPORT BLVD
City	PASADENA
State	TX
ZIP	77507
County	HARRIS
Latitude (N) (##.#####)	29.610555
Longitude (W) (-###.#####)	-95.059166
Facility NAICS Code	
What is the primary business of this entity?	CATALYST MANUFACTURING

**Customer (Applicant) Information**

How is this applicant associated with this	Owner Operator
--	----------------

site?

What is the applicant's Customer Number (CN)?

CN600132435

Type of Customer

Corporation

Full legal name of the applicant:

Legal Name

Topsoe, Inc.

Texas SOS Filing Number

51721100

Federal Tax ID

131943844

State Franchise Tax ID

11319438443

State Sales Tax ID

Local Tax ID

DUNS Number

77874162

Number of Employees

101-250

Independently Owned and Operated?

## Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name

TOPSOE INC

Prefix

MR

First

JULIO

Middle

Last

HOLGADO

Suffix

Credentials

Title

PLANT MANAGER

Enter new address or copy one from list:

Mailing Address

Address Type

Domestic

Mailing Address (include Suite or Bldg. here, if applicable)

10010 BAYPORT BLVD

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

City

PASADENA

State

TX

ZIP

77507

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

2812285212

Extension

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

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

2812285209

E-mail

jul@topsoe.com

## Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact. JOHN BRANOM(TOPSOE INC... )

Organization Name TOPSOE INC

Prefix MR

First JOHN

Middle

Last BRANOM

Suffix

Credentials

Title SENIOR EHS ADVISOR

Enter new address or copy one from list:

Mailing Address

Address Type Domestic

Mailing Address (include Suite or Bldg. here, if applicable) 10010 BAYPORT BLVD

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

City PASADENA

State TX

ZIP 77507

Phone (###-###-####) 2812285227

Extension

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

Fax (###-###-####) 2812285209

E-mail jbr@topsoe.com

## Title V General Information - Existing

1) Permit Type: SOP

2) Permit Latitude Coordinate: 29 Deg 36 Min 38 Sec

3) Permit Longitude Coordinate: 95 Deg 3 Min 33 Sec

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

4.1. Select the permit/project number for which this update should be applied. 1217-37149

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

## Title V Attachments Existing

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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)

[File Properties]

File Name	<a href="/ePermitsExternal/faces/file?fileId=234149">OP_REQ1_Topsoe Form OP-REQ1 page 89 011325.pdf</a>
Hash	CAFC18B82779E241609BFA89FE50BFAABBC8A319976E5CEBF1EC0EB0DCAEE2F8
MIME-Type	application/pdf

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	<a href="/ePermitsExternal/faces/file?fileId=234148">Topsoe Form OP-CRO1</a>
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	011325.pdf</a>
Hash	CC28C5DD4AB8F0F58E0F62D31D88C6770A8291CB8D4F25DA776ED551E41EF8C1
MIME-Type	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 Julio Holgado, the owner of the STEERS account ER097301.
- 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 1217.
- 9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEQ.

OWNER OPERATOR Signature: Julio Holgado OWNER OPERATOR

Account Number:	ER097301
Signature IP Address:	155.190.8.7
Signature Date:	2025-01-13
Signature Hash:	1FCBC71CAE48F48761A31DFEFCF744BB4504D35613BC8AB8E7D01D4BC2DC50BF
Form Hash Code at time of Signature:	51135A0FC180EC5D2C7E5D93E7288D736085C9F1D12A116731400E3DDF39E047

Submission

Reference Number:	The application reference number is 745011
Submitted by:	The application was submitted by ER097301/ Julio Holgado
Submitted Timestamp:	The application was submitted on 2025-01-13 at 14:13:21 CST
Submitted From:	The application was submitted from IP address 155.190.8.7

Confirmation Number:

The confirmation number is 618386

Steers Version:

The STEERS version is 6.85

Permit Number:

The permit number is 1217

## Additional Information

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Application Creator: This account was created by Stuart L Keil

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**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.

<b>I. Identifying Information</b>		
RN: 101211498	CN: 600132435	Account No.: HG-0903-L
Permit No.: O1217	Project No.: 37149	
Area Name: HTI Bayport	Company Name: Topsoe, Inc.	
<b>II. Certification Type</b> <i>(Please mark the appropriate box)</i>		
<input checked="" type="checkbox"/> Responsible Official		<input type="checkbox"/> Duly Authorized Representative
<b>III. Submittal Type</b> <i>(Please mark the appropriate box) (Only one response can be accepted per form)</i>		
<input type="checkbox"/> SOP/TOP Initial Permit Application		<input type="checkbox"/> Update to Permit Application
<input type="checkbox"/> GOP Initial Permit Application		<input checked="" type="checkbox"/> Permit Revision, Renewal, or Reopening
<input type="checkbox"/> Other: _____		
<b>IV. Certification of Truth</b>		
<p><b>This certification does not extend to information which is designated by the TCEQ as information for reference only.</b></p> <p>I, <u>Julio C. Holgado</u> certify that I am the <u>RO</u> <i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i></p> <p>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:</p> <p><i>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).</i></p> <p>Time Period: From _____ to _____ <span style="margin-left: 150px;"><i>Start Date</i></span><span style="margin-left: 150px;"><i>End Date</i></span></p> <p>Specific Dates: <u>01/13/2025</u> _____ <span style="margin-left: 40px;"><i>Date 1</i></span><span style="margin-left: 40px;"><i>Date 2</i></span><span style="margin-left: 40px;"><i>Date 3</i></span><span style="margin-left: 40px;"><i>Date 4</i></span><span style="margin-left: 40px;"><i>Date 5</i></span><span style="margin-left: 40px;"><i>Date 6</i></span></p>		
Signature: <u>Julio C. Holgado</u> Signature Date: <u>01/13/2025</u>		
Title: <u>Plant Manager</u>		

**Application Area-Wide Applicability Determinations and General Information**  
**Form OP-REQ1 (Page 89)**  
**Federal Operating Permit Program**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
01/13/2025	O1217	101211498

For SOP applications, answer ALL questions unless otherwise directed.

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

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

- ◆ **H. Title 30 TAC Chapter 116 Permits, Special Permits, Standard Permits, Other Authorizations (Other Than Permits By Rule, PSD Permits, NA Permits) for the Application Area**

Authorization No.	Issuance Date	Authorization No.	Issuance Date	Authorization No.	Issuance Date
9203	11/15/2024				
21178	04/19/2023				

- ◆ **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.*

PBR No.	Version No./Date	PBR No.	Version No./Date	PBR No.	Version No./Date
106.144	09/04/2000	106.472	09/04/2000		
106.227	09/04/2000	106.511	09/04/2000		
106.261	11/01/2003	106.532	09/04/2000		
106.262	11/01/2003				
106.263	11/01/2001				
106.265	09/04/2000				
106.371	09/04/2000				
106.412	09/04/2000				

- ◆ **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

Texas Commission on Environmental Quality

Title V Existing

1217

Site Information (Regulated Entity)

What is the name of the permit area to be authorized? HTI BAYPORT

Does the site have a physical address? Yes

Physical Address

Number and Street 10010 BAYPORT BLVD

City PASADENA

State TX

ZIP 77507

County HARRIS

Latitude (N) (##.#####) 29.610555

Longitude (W) (-###.#####) 95.059166

Primary SIC Code 2819

Secondary SIC Code

Primary NAICS Code 325188

Secondary NAICS Code

Regulated Entity Site Information

What is the Regulated Entity's Number (RN)? RN101211498

What is the name of the Regulated Entity (RE)? HALDOR TOPSOE

Does the RE site have a physical address? Yes

Physical Address

Number and Street 10010 BAYPORT BLVD

City PASADENA

State TX

ZIP 77507

County HARRIS

Latitude (N) (##.#####) 29.610555

Longitude (W) (-###.#####) -95.059166

Facility NAICS Code

What is the primary business of this entity? CATALYST MANUFACTURING

Customer (Applicant) Information

How is this applicant associated with this site? Owner Operator

What is the applicant's Customer Number (CN)? CN600132435

Type of Customer Corporation

Full legal name of the applicant:

Legal Name Topsoe, Inc.

Texas SOS Filing Number 51721100  
Federal Tax ID 131943844  
State Franchise Tax ID 11319438443  
State Sales Tax ID  
Local Tax ID  
DUNS Number 77874162  
Number of Employees 101-250  
Independently Owned and Operated?

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name TOPSOE INC

Prefix MR

First JULIO

Middle

Last HOLGADO

Suffix

Credentials

Title PLANT MANAGER

Enter new address or copy one from list:

Mailing Address

Address Type Domestic

Mailing Address (include Suite or Bldg. here, if applicable) 10010 BAYPORT BLVD

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

City PASADENA

State TX

ZIP 77507

Phone (###-###-####) 2812285212

Extension

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

Fax (###-###-####) 2812285209

E-mail jul@topsoe.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact. JOHN BRANOM(TOPSOE INC... )

Organization Name TOPSOE INC

Prefix MR

First JOHN

Middle

Last BRANOM

Suffix

Credentials

Title SENIOR EHS ADVISOR

Enter new address or copy one from list:

Mailing Address

Address Type Domestic

Mailing Address (include Suite or Bldg. here, if applicable) 10010 BAYPORT BLVD

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

City PASADENA

State TX

ZIP 77507

Phone (###-###-####) 2812285227

Extension

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

Fax (###-###-####) 2812285209

E-mail jbr@topsoe.com

#### Title V General Information - Existing

1) Permit Type: SOP

2) Permit Latitude Coordinate: 29 Deg 36 Min 38 Sec

3) Permit Longitude Coordinate: 95 Deg 3 Min 33 Sec

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

4.1. Select the permit/project number for which this update should be applied. 1217-37149

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)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=234149>OP\_REQ1\_Topsoe Form OP-REQ1  
page 89 011325.pdf</a>

Hash CAF8C18B82779E241609BFA89FE50BFAABBC8A319976E5CEBF1EC0EB0DCAEE2F8

MIME-Type application/pdf

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            <a href=/ePermitsExternal/faces/file?fileId=234148>Topsoe Form OP-CRO1  
011325.pdf</a>

Hash                CC28C5DD4AB8F0F58E0F62D31D88C6770A8291CB8D4F25DA776ED551E41EF8C1

MIME-Type            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.

I am Julio Holgado, the owner of the STEERS account ER097301.

I have the authority to sign this data on behalf of the applicant named above.

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.

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.

I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.



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.

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.

I am knowingly and intentionally signing Title V Existing 1217.

My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEQ.

OWNER OPERATOR Signature: Julio Holgado OWNER OPERATOR

Account Number: ER097301

Signature IP Address: 155.190.8.7

Signature Date: 2025-01-13

Signature Hash:

1FCBC71CAE48F48761A31DFEFCF744BB4504D35613BC8AB8E7D01D4BC2DC50BF

Form Hash Code at time of Signature:

51135A0FC180EC5D2C7E5D93E7288D736085C9F1D12A116731400E3DDF39E047

#### Submission

Reference Number: The application reference number is 745011

Submitted by: The application was submitted by ER097301/Julio Holgado

Submitted Timestamp: The application was submitted on 2025-01-13 at 14:13:21 CST

Submitted From: The application was submitted from IP address 155.190.8.7

Confirmation Number: The confirmation number is 618386

Steers Version: The STEERS version is 6.85

Permit Number: The permit number is 1217

#### Additional Information

Application Creator: This account was created by Stuart L Keil

**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.

<b>I. Identifying Information</b>		
RN: 101211498	CN: 600132435	Account No.: HG-0903-L
Permit No.: O1217	Project No.: 37149	
Area Name: HTI Bayport	Company Name: Topsoe, Inc.	
<b>II. Certification Type</b> <i>(Please mark the appropriate box)</i>		
<input checked="" type="checkbox"/> Responsible Official		<input type="checkbox"/> Duly Authorized Representative
<b>III. Submittal Type</b> <i>(Please mark the appropriate box) (Only one response can be accepted per form)</i>		
<input type="checkbox"/> SOP/TOP Initial Permit Application		<input type="checkbox"/> Update to Permit Application
<input type="checkbox"/> GOP Initial Permit Application		<input checked="" type="checkbox"/> Permit Revision, Renewal, or Reopening
<input type="checkbox"/> Other: _____		
<b>IV. Certification of Truth</b>		
<p><b>This certification does not extend to information which is designated by the TCEQ as information for reference only.</b></p> <p>I, <u>Julio C. Holgado</u> certify that I am the <u>RO</u> <i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i></p> <p>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:</p> <p><i>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).</i></p> <p>Time Period: From _____ to _____ <span style="margin-left: 150px;"><i>Start Date</i></span><span style="margin-left: 150px;"><i>End Date</i></span></p> <p>Specific Dates: <u>01/13/2025</u> _____ <span style="margin-left: 40px;"><i>Date 1</i></span><span style="margin-left: 40px;"><i>Date 2</i></span><span style="margin-left: 40px;"><i>Date 3</i></span><span style="margin-left: 40px;"><i>Date 4</i></span><span style="margin-left: 40px;"><i>Date 5</i></span><span style="margin-left: 40px;"><i>Date 6</i></span></p>		
Signature: <u>Julio C. Holgado</u> Signature Date: <u>01/13/2025</u>		
Title: <u>Plant Manager</u>		

**Application Area-Wide Applicability Determinations and General Information**  
**Form OP-REQ1 (Page 89)**  
**Federal Operating Permit Program**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
01/13/2025	O1217	101211498

For SOP applications, answer ALL questions unless otherwise directed.

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

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

- ◆ **H. Title 30 TAC Chapter 116 Permits, Special Permits, Standard Permits, Other Authorizations (Other Than Permits By Rule, PSD Permits, NA Permits) for the Application Area**

Authorization No.	Issuance Date	Authorization No.	Issuance Date	Authorization No.	Issuance Date
9203	11/15/2024				
21178	04/19/2023				

- ◆ **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.*

PBR No.	Version No./Date	PBR No.	Version No./Date	PBR No.	Version No./Date
106.144	09/04/2000	106.472	09/04/2000		
106.227	09/04/2000	106.511	09/04/2000		
106.261	11/01/2003	106.532	09/04/2000		
106.262	11/01/2003				
106.263	11/01/2001				
106.265	09/04/2000				
106.371	09/04/2000				
106.412	09/04/2000				

- ◆ **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

## Texas Commission on Environmental Quality

Title V Existing

1217

### Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	HTI BAYPORT
Does the site have a physical address?	Yes
Physical Address	
Number and Street	10010 BAYPORT BLVD
City	PASADENA
State	TX
ZIP	77507
County	HARRIS
Latitude (N) (##.#####)	29.610555
Longitude (W) (-###.#####)	95.059166
Primary SIC Code	2819
Secondary SIC Code	
Primary NAICS Code	325188
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN101211498
What is the name of the Regulated Entity (RE)?	HALDOR TOPSOE
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	10010 BAYPORT BLVD
City	PASADENA
State	TX
ZIP	77507
County	HARRIS
Latitude (N) (##.#####)	29.610555
Longitude (W) (-###.#####)	-95.059166
Facility NAICS Code	
What is the primary business of this entity?	CATALYST MANUFACTURING

### Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN600132435
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Topsoe, Inc.
Texas SOS Filing Number	51721100
Federal Tax ID	131943844
State Franchise Tax ID	11319438443
State Sales Tax ID	

Local Tax ID	
DUNS Number	77874162
Number of Employees	101-250
Independently Owned and Operated?	

## Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	TOPSOE INC
Prefix	MR
First	JULIO
Middle	
Last	HOLGADO
Suffix	
Credentials	
Title	PLANT MANAGER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	10010 BAYPORT BLVD
Routing (such as Mail Code, Dept., or Attn:)	
City	PASADENA
State	TX
ZIP	77507
Phone (###-###-####)	2812285212
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	2812285209
E-mail	jul@topsoe.com

## Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.	JOHN BRANOM(TOPSOE INC... )
Organization Name	TOPSOE INC
Prefix	MR
First	JOHN
Middle	
Last	BRANOM
Suffix	
Credentials	
Title	SENIOR EHS ADVISOR
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	10010 BAYPORT BLVD

Routing (such as Mail Code, Dept., or Attn:)	
City	PASADENA
State	TX
ZIP	77507
Phone (###-###-####)	2812285227
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	2812285209
E-mail	jbr@topsoe.com

## Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	29 Deg 36 Min 38 Sec
3) Permit Longitude Coordinate:	95 Deg 3 Min 33 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?	Streamlined Revision
4.1.1. Are there any permits that should be voided upon issuance of this permit application through permit conversion?	No
4.1.2. Are there any permits that should be voided upon issuance of this permit application through permit consolidation?	No
5) 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)	
[File Properties]	
File Name	<a href=/ePermitsExternal/faces/file?fileId=216046>OP_2_Topsoe Form OP-2 091624.pdf</a>
Hash	0AA0291D35086483ADA8D5ECB954B8587C016FE0BE4E2F5D4D1AA02B2C9907AC
MIME-Type	application/pdf
Attach OP-REQ1 (Application Area-Wide Applicability Determinations and General Information)	
Attach OP-REQ2 (Negative Applicable Requirement Determinations)	
Attach OP-REQ3 (Applicable Requirements Summary)	
Attach OP-PBR SUP (Permits by Rule Supplemental Table)	
Attach OP-SUMR (Individual Unit Summary for Revisions)	
Attach OP-MON (Monitoring Requirements)	

Attach OP-UA (Unit Attribute) Forms

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

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach any other necessary information needed to complete the permit.

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

Expedite Title V

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

No

Certification

I certify that I am the 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 Julio Holgado, the owner of the STEERS account ER097301.
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 1217.
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: Julio Holgado OWNER OPERATOR

Account Number:ER097301

Signature IP Address:155.190.37.7

Signature Date:2024-09-16

Signature Hash:1FCBC71CAE48F48761A31DFEFCF744BB4504D35613BC8AB8E7D01D4BC2DC50BF

Form Hash Code at time of Signature:38896F9586CC8890D18BA827E9CD61D24DC36DFE01E6BB4CADA12302A0E40C4E

Submission

Reference Number:

The application reference number is 679703

Submitted by:

The application was submitted by  
ER097301/Julio Holgado

Submitted Timestamp:

The application was submitted on 2024-09-16 at 09:30:16 CDT

Submitted From:

The application was submitted from IP address 155.190.37.7

Confirmation Number:

The confirmation number is 563383

Steers Version:

The STEERS version is 6.82

Permit Number:

The permit number is 1217

## Additional Information

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Application Creator: This account was created by Stuart L Keil

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

<b>Date:</b>	09/16/2024							
<b>Permit No.:</b>	O1217							
<b>Regulated Entity No.:</b>	101211498							
<b>Company Name:</b>	Topsoe, Inc.							
<b>For Submissions to EPA</b>								
Has a copy of this application been submitted (or is being submitted) to EPA?								■ YES □ NO
<b>I. Application Type</b>								
Indicate the type of application:								
<input type="checkbox"/> Renewal <input checked="" type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.) <input type="checkbox"/> Significant Revision <input type="checkbox"/> Revision Requesting Prior Approval <input type="checkbox"/> Administrative Revision <input type="checkbox"/> Response to Reopening								
<b>II. Qualification Statement</b>								
For SOP Revisions Only The referenced changes qualify for the marked revision type.								■ YES □ NO
For GOP Revisions Only The permitted area continues to qualify for a GOP.								□ YES □ NO
<b>III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)</b>								
Indicate all pollutants for which the site is a major source based on the site's potential to emit after the change is operated:								
<b>Pollutant</b>	<b>VOC</b>	<b>NO<sub>x</sub></b>	<b>SO<sub>2</sub></b>	<b>PM<sub>10</sub></b>	<b>CO</b>	<b>Pb</b>	<b>HAPs</b>	<b>Other</b>
Major at the site (YES/NO):	NO	YES	NO	NO	NO	NO	NO	
<b>IV. Reference Only Requirements (For reference only)</b>								
Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)?								■ YES □ NO □ N/A
<b>V. Delinquent Fees and Penalties</b>								
Notice: This form will not be processed until all delinquent fees and/or penalties owed the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.								

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

<b>Date:</b>	09/16/2024					
<b>Permit No.:</b>	O1217					
<b>Regulated Entity No.:</b>	101211498					
<b>Company Name:</b>	Topsoe, Inc.					
<b>I. Description of Revision</b>						
Revision No.	Revision Code	New Unit	Unit/Group Process ID No.	Applicable Form	NSR Authorization	Description of change and Provisional Terms and Conditions
1	MS-A	NO	PRE-ST-28, ST-29	NA	9203	<p>New Source Review (NSR) Permit No. 9203 is being amended to allow for the addition of a new raw material in the manufacturing of the catalyst in the TK3 Plant.</p> <p>This proposed change does not affect any of the permitted facilities' unique attributes or require any other changes to the Title V permit's source requirements.</p> <p>The only permit revision needed is that the amended NSR permit's issuance date should be updated in the Title V permit's New Source Review Authorization References Table.</p>

Texas Commission on Environmental Quality

Title V Existing

1217

Site Information (Regulated Entity)

What is the name of the permit area to be authorized? HTI BAYPORT

Does the site have a physical address? Yes

Physical Address

Number and Street 10010 BAYPORT BLVD

City PASADENA

State TX

ZIP 77507

County HARRIS

Latitude (N) (##.#####) 29.610555

Longitude (W) (-###.#####) 95.059166

Primary SIC Code 2819

Secondary SIC Code

Primary NAICS Code 325188

Secondary NAICS Code

Regulated Entity Site Information

What is the Regulated Entity's Number (RN)? RN101211498

What is the name of the Regulated Entity (RE)? HALDOR TOPSOE

Does the RE site have a physical address? Yes

Physical Address

Number and Street 10010 BAYPORT BLVD

City PASADENA

State TX

ZIP 77507

County HARRIS

Latitude (N) (##.#####) 29.610555

Longitude (W) (-###.#####) -95.059166

Facility NAICS Code

What is the primary business of this entity? CATALYST MANUFACTURING

Customer (Applicant) Information

How is this applicant associated with this site? Owner Operator

What is the applicant's Customer Number (CN)? CN600132435

Type of Customer Corporation

Full legal name of the applicant:

Legal Name Topsoe, Inc.

Texas SOS Filing Number 51721100  
Federal Tax ID 131943844  
State Franchise Tax ID 11319438443  
State Sales Tax ID  
Local Tax ID  
DUNS Number 77874162  
Number of Employees 101-250  
Independently Owned and Operated?

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name TOPSOE INC

Prefix MR

First JULIO

Middle

Last HOLGADO

Suffix

Credentials

Title PLANT MANAGER

Enter new address or copy one from list:

Mailing Address

Address Type Domestic

Mailing Address (include Suite or Bldg. here, if applicable) 10010 BAYPORT BLVD

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

City PASADENA

State TX

ZIP 77507

Phone (###-###-####) 2812285212

Extension

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

Fax (###-###-####) 2812285209

E-mail jul@topsoe.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact. JOHN BRANOM(TOPSOE INC... )

Organization Name TOPSOE INC

Prefix MR

First JOHN

Middle

Last BRANOM

Suffix

Credentials

Title SENIOR EHS ADVISOR

Enter new address or copy one from list:

Mailing Address

Address Type Domestic

Mailing Address (include Suite or Bldg. here, if applicable) 10010 BAYPORT BLVD

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

City PASADENA

State TX

ZIP 77507

Phone (###-###-####) 2812285227

Extension

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

Fax (###-###-####) 2812285209

E-mail jbr@topsoe.com

#### Title V General Information - Existing

1) Permit Type: SOP

2) Permit Latitude Coordinate: 29 Deg 36 Min 38 Sec

3) Permit Longitude Coordinate: 95 Deg 3 Min 33 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? Streamlined Revision

4.1.1. Are there any permits that should be voided upon issuance of this permit application through permit conversion? No

4.1.2. Are there any permits that should be voided upon issuance of this permit application through permit consolidation? No

5) 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)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=216046>OP\_2\_Topsoe Form OP-2 091624.pdf</a>

Hash 0AA0291D35086483ADA8D5ECB954B8587C016FE0BE4E2F5D4D1AA02B2C9907AC

MIME-Type application/pdf

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

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

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

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach any other necessary information needed to complete the permit.

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

Expedite Title V

1) Per Texas Health and Safety Code, Section 382.05155, does the applicant want to expedite the processing of this application? ☐ No

Certification

I certify that I am the 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.

I am Julio Holgado, the owner of the STEERS account ER097301.

I have the authority to sign this data on behalf of the applicant named above.

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.

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.

I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.

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.

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.

I am knowingly and intentionally signing Title V Existing 1217.

My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEQ.

OWNER OPERATOR Signature: Julio Holgado OWNER OPERATOR

Account Number: ER097301

Signature IP Address: 155.190.37.7

Signature Date: 2024-09-16

Signature Hash:

1FCBC71CAE48F48761A31DFEFCF744BB4504D35613BC8AB8E7D01D4BC2DC50BF

Form Hash Code at time of Signature:

38896F9586CC8890D18BA827E9CD61D24DC36DFE01E6BB4CADA12302A0E40C4E

#### Submission

Reference Number: The application reference number is 679703

Submitted by: The application was submitted by ER097301/Julio Holgado

Submitted Timestamp: The application was submitted on 2024-09-16 at 09:30:16 CDT

Submitted From: The application was submitted from IP address 155.190.37.7

Confirmation Number: The confirmation number is 563383

Steers Version: The STEERS version is 6.82

Permit Number: The permit number is 1217

#### Additional Information

Application Creator: This account was created by Stuart L Keil

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

<b>Date:</b>	09/16/2024							
<b>Permit No.:</b>	O1217							
<b>Regulated Entity No.:</b>	101211498							
<b>Company Name:</b>	Topsoe, Inc.							
<b>For Submissions to EPA</b>								
Has a copy of this application been submitted (or is being submitted) to EPA?								■ YES □ NO
<b>I. Application Type</b>								
Indicate the type of application:								
<input type="checkbox"/> Renewal <input checked="" type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.) <input type="checkbox"/> Significant Revision <input type="checkbox"/> Revision Requesting Prior Approval <input type="checkbox"/> Administrative Revision <input type="checkbox"/> Response to Reopening								
<b>II. Qualification Statement</b>								
For SOP Revisions Only The referenced changes qualify for the marked revision type.								■ YES □ NO
For GOP Revisions Only The permitted area continues to qualify for a GOP.								□ YES □ NO
<b>III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)</b>								
Indicate all pollutants for which the site is a major source based on the site's potential to emit after the change is operated:								
<b>Pollutant</b>	<b>VOC</b>	<b>NO<sub>x</sub></b>	<b>SO<sub>2</sub></b>	<b>PM<sub>10</sub></b>	<b>CO</b>	<b>Pb</b>	<b>HAPs</b>	<b>Other</b>
Major at the site (YES/NO):	NO	YES	NO	NO	NO	NO	NO	
<b>IV. Reference Only Requirements (For reference only)</b>								
Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)?								■ YES □ NO □ N/A
<b>V. Delinquent Fees and Penalties</b>								
Notice: This form will not be processed until all delinquent fees and/or penalties owed the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.								



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

<b>Date:</b>	09/16/2024					
<b>Permit No.:</b>	O1217					
<b>Regulated Entity No.:</b>	101211498					
<b>Company Name:</b>	Topsoe, Inc.					
<b>I. Description of Revision</b>						
Revision No.	Revision Code	Unit/Group Process			NSR Authorization	Description of change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
1	MS-A	NO	PRE-ST-28, ST-29	NA	9203	<p>New Source Review (NSR) Permit No. 9203 is being amended to allow for the addition of a new raw material in the manufacturing of the catalyst in the TK3 Plant.</p> <p>This proposed change does not affect any of the permitted facilities' unique attributes or require any other changes to the Title V permit's source requirements.</p> <p>The only permit revision needed is that the amended NSR permit's issuance date should be updated in the Title V permit's New Source Review Authorization References Table.</p>