



41 Tidal Rd. PO Box 158
Deer Park, TX 77536-0158

*Submitted Electronically via
State of Texas Environmental Electronic Reporting System (STEERS)*

December 9, 2024

Texas Commission on Environmental Quality
Air Permits Initial Review Team (APIRT), MC 161
12100 Park 35 Circle, Building C, Third Floor
Austin, Texas 78753

**Subject: Title V Site Operating Permit O2191 Streamlined Revision Application
The Lubrizol Corporation, Deer Park Plant
TCEQ Account Number: HG-0459-J
RN100221589; CN600269617**

To Whom It May Concern:

The Lubrizol Corporation (Lubrizol) is submitting this minor revision application for Site Operating Permit (SOP) O2191 for the BL-4 System at the Deer Park Plant located in Deer Park, Texas.

In accordance with TCEQ's Site Operating Permit Revision Application Guidance Document, the application includes the following:

- Form OP-2 (Application for Permit Revision)

With the exception of the items documented in the following forms, all Unit IDs remain unchanged from the most current version of the permit:

- Form OP-SUMR (Individual Unit Summary for Revisions);
- Form OP-REQ1 Pg 89 (Application Area-Wide Applicability Determinations and General Information);
- Form OP-REQ3 (Applicable Requirements Summary); and
- Form OP-UA15 (Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes).

If you have any questions or require additional information regarding this submittal, please contact Debbie Li via email at TXENV@Lubrizol.com or via telephone at (832) 260-7504.

Sincerely,

A handwritten signature in black ink that reads "Nyx Black".

Nyx Black
Environmental Systems and Air Permitting Manager
The Lubrizol Corporation

Enclosures

cc: Latrice Babin, Ph.D., Director, Harris County Pollution Control Services Department, 101 S.
Richey St, Ste. H, Pasadena, Texas 77506-1023
CERTIFIED RECEIPT – 9589 0710 5270 2089 2839 68

TCEQ Region 12
Electronic Submittal to R12APDMail@tceq.texas.gov

EPA Region 6
Electronic Submittal to R6AirPermitsTX@epa.gov per Form OP-1 Instructions

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

Date:	12/09/2024		
Permit No.:	O2191		
Regulated Entity No.:	100221589		
Company / Area Name:	The Lubrizol Corporation / BL-4 System		
For Submissions to EPA			
Has a copy of this application been submitted (or is being submitted) to EPA?			<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
I. Application Type			
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			
II. Qualification Statement			
For SOP Revisions Only			<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
For GOP Revisions Only			<input type="checkbox"/> YES <input type="checkbox"/> 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 a change in regulations.)
Indicate all pollutants for which the site is a major source based on the site's potential to emit after the change is operated:
<input checked="" type="checkbox"/> VOC <input checked="" type="checkbox"/> NO _x <input checked="" type="checkbox"/> SO ₂ <input checked="" type="checkbox"/> PM ₁₀ <input checked="" type="checkbox"/> CO <input type="checkbox"/> Pb <input checked="" type="checkbox"/> HAP
Other:
IV. Reference Only Requirements (For reference only)
Has the applicant paid emissions fees for the most recent agency fiscal year (September 1-Aug <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
V. Delinquent Fees and Penalties
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.

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

Date:	12/09/2024
Permit No.:	O2191
Regulated Entity No.:	100221589
Company / Area Name:	The Lubrizol Corporation / BL-4 System

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

Revision No.	Revision Code	Unit/Group/Process			NSR Authorization	Description of Changes and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
1	MS-A	No	BL-4	OP-UA15	22046	Update NSR authorization to include NSR Permit No. 22046. Add new 30 TAC Chapter 115 operating scenarios as provided on OP-UA15.
2	MS-A	No	BL-5	OP-SUMR	22046	Update NSR authorization to include NSR Permit No. 22046. Additionally, add additional 30 TAC Chapter 115 operating scenarios as provided on OP-UA15.
3	MS-A	No	SS-32	OP-SUMR	22046	Update NSR authorization to include NSR Permit No. 22046.
4	MS-A	No	SS-33	OP-SUMR	22046	Update NSR authorization to include NSR Permit No. 22046.
5	MS-A	No	SS-34	OP-SUMR	22046	Update NSR authorization to include NSR Permit No. 22046.
6	MS-A	No	RA-2	OP-SUMR	22046	Update NSR authorization to include NSR Permit No. 22046.
7	MS-A	No	AG-5	OP-SUMR	22046	Update NSR authorization to include NSR Permit No. 22046.
8	MS-A	No	SITEWIDE	OP-REQ1	22046	Incorporate NSR Permit No. 22046 into FOP.
9	MS-A	No	SITEWIDE	OP-REQ1	22048	Incorporate latest issuance of NSR Permit No. 22048 into FOP (issued 9/23/2024).
10	MS-C	No	FI-07	OP-SUMR	-	Remove source from permit. It is being incorporated into FOP O1932.
11	MS-C	No	FR-002	OP-SUMR	-	Remove source from permit. It is being incorporated into FOP O1932.

**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.
12/09/2024	O2191	100221589

Unit/ Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
	1	BL-4	OP-UA15	PROCESS VESSEL		22048 22046	
	2	BL-5	OP-UA15	PROCESS VESSEL		22048 22046	
	3	SS-32	OP-SUMR	STORAGE TANK		22048 22046	
	4	SS-33	OP-SUMR	STORAGE TANK		22048 22046	
	5	SS-34	OP-SUMR	STORAGE TANK		22048 22046	
	6	RA-2	OP-SUMR	STORAGE TANK		22048 22046	
	7	AG-5	OP-SUMR	STORAGE TANK		22048 22046	
D	10	FI-07	OP-SUMR	THERMAL OXIDIZER		22048	
D	11	FR-002	OP-SUMR	EMERGENCY FLARE		106.492/09/04/2000 [171233]	

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.
12/09/2024	O2191	RN100221589

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
22046	TBD				
22048	9/23/2024				

- ◆ **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

- ◆ **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

Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program
Table 1a: Additions

Date:	12/09/2024	Regulated Entity No.: 100221589	Permit No.: O2191
Company Name:	The Lubrizol Corporation	Area Name:	BL-4 System

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
1	BL-4	OP-UA15	R5121-0002	VOC	30 TAC Chapter 115, Vent Gas Controls	§115.122(a)(1) §115.121(a)(1) §115.122(a)(1)(A)
1	BL-4	OP-UA15	R5121-0005	VOC	30 TAC Chapter 115, Vent Gas Controls	§115.121(a)(1) §115.122(a)(1) §115.122(a)(1)(B) §60.18
2	BL-5	OP-UA15	R5121-0002	VOC	30 TAC Chapter 115, Vent Gas Controls	§115.122(a)(1) §115.121(a)(1) §115.122(a)(1)(A)
2	BL-5	OP-UA15	R5121-0005	VOC	30 TAC Chapter 115, Vent Gas Controls	§115.121(a)(1) §115.122(a)(1) §115.122(a)(1)(B) §60.18

Applicable Requirements Summary
Form OP-REQ3 (Page 2)
Federal Operating Permit Program
Table 1b: Additions

Date: 12/09/2024	Regulated Entity No.: 100221589	Permit No.: O2191
Company Name: The Lubrizol Corporation	Area Name: BL-4 System	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
1	BL-4	R5121-0002	VOC	[G]§115.125 §115.126(1) §115.126(1)(A) §115.126(1)(A)(i) §115.126(2)	§115.126 §115.126(1) §115.126(1)(A) §115.126(1)(A)(i) §115.126(2)	None
1	BL-4	R5121-0005	VOC	[G]§115.125 §115.126(1) §115.126(1)(B) §115.126(2)	§115.126 §115.126(1) §115.126(1)(B) §115.126(2)	None
2	BL-5	R5121-0002	VOC	[G]§115.125 §115.126(1) §115.126(1)(A) §115.126(1)(A)(i) §115.126(2)	§115.126 §115.126(1) §115.126(1)(A) §115.126(1)(A)(i) §115.126(2)	None
2	BL-5	R5121-0005	VOC	[G]§115.125 §115.126(1) §115.126(1)(B) §115.126(2)	§115.126 §115.126(1) §115.126(1)(B) §115.126(2)	None

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.:
12/09/2024	O2191	100221589

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
BL-4	R5121-0002	NO	NO	REGVAPPL				
BL-4	R5121-0005	NO	NO	REGVAPPL				
BL-5	R5121-0002	NO	NO	REGVAPPL				
BL-5	R5121-0005	NO	NO	REGVAPPL				

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.:
12/09/2024	O2191	100221589

Emission Point ID No.	SOP Index No.	Alternate Control Requirement	ACR ID No.	Control Device Type	Control Device ID No.
BL-4	R5121-0002	NONE		DIRFLM	H-001 FI-07
BL-4	R5121-0005	NONE		FLARE	FR-001
BL-5	R5121-0002	NONE		DIRFLM	H-001 FI-07
BL-5	R5121-0005	NONE		FLARE	FR-001

Texas Commission on Environmental Quality

Title V Existing

2191

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	BL-4 SYSTEM
Does the site have a physical address?	Yes
Physical Address	
Number and Street	41 TIDAL RD
City	DEER PARK
State	TX
ZIP	77536
County	HARRIS
Latitude (N) (##.#####)	29.718055
Longitude (W) (-###.#####)	95.115833
Primary SIC Code	2869
Secondary SIC Code	
Primary NAICS Code	32519
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN100221589
What is the name of the Regulated Entity (RE)?	LUBRIZOL DEER PARK
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	41 TIDAL RD
City	DEER PARK
State	TX
ZIP	77536
County	HARRIS
Latitude (N) (##.#####)	29.720555
Longitude (W) (-###.#####)	-95.112777
Facility NAICS Code	
What is the primary business of this entity?	CHEMICAL PLANT MANUFACTURING

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN600269617
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	The Lubrizol Corporation
Texas SOS Filing Number	1368206
Federal Tax ID	201483715
State Franchise Tax ID	13403676003
State Sales Tax ID	

Local Tax ID	
DUNS Number	39049994
Number of Employees	501+
Independently Owned and Operated?	No

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	THE LUBRIZOL CORPORATION
Prefix	MR
First	LG
Middle	
Last	TACKETT
Suffix	
Credentials	
Title	SENIOR VICE PRESIDENT OPERATIONS
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 158
Routing (such as Mail Code, Dept., or Attn:)	
City	DEER PARK
State	TX
ZIP	77536
Phone (###-###-####)	4403471012
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	txenv@lubrizol.com

Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application

Select existing DAR contact or enter a new contact.	HECTOR ACOSTA(THE LUBRIZOL CO...)
Organization Name	THE LUBRIZOL CORPORATION
Prefix	MR
First	HECTOR
Middle	
Last	ACOSTA
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)	PO BOX 158

Routing (such as Mail Code, Dept., or Attn:)	
City	DEER PARK
State	TX
Zip	77536
Phone (###-###-####)	2814792851
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	txenv@lubrizol.com

Technical Contact

Person TCEQ should contact for questions about this application:	
Select existing TC contact or enter a new contact.	DEBBIE LI(THE LUBRIZOL CO...)
Organization Name	THE LUBRIZOL CORPORATION
Prefix	MS
First	DEBBIE
Middle	
Last	LI
Suffix	
Credentials	
Title	ENVIRONMENTAL ENGINEER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	41 TIDAL RD
Routing (such as Mail Code, Dept., or Attn:)	
City	DEER PARK
State	TX
ZIP	77536
Phone (###-###-####)	8322607504
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	TXENV@Lubrizol.com

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	29 Deg 43 Min 5 Sec
3) Permit Longitude Coordinate:	95 Deg 6 Min 57 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) Who will electronically sign this Title V application?	Duly Authorized Representative
6) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)		
Attach OP-2 (Application for Permit Revision/Renewal)		
Attach OP-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.		
[File Properties]		
File Name	2024_11_26 O2191 Revision Application.pdf	
Hash	90652B64A95119BE632FB9BE596B3B9DC2C3217AB87F09F884829A02604A85E0	
MIME-Type	application/pdf	

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
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Certification

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

- 1. I am Hector Acosta, the owner of the STEERS account ER093631.
- 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 2191.
- 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: Hector Acosta OWNER OPERATOR

Account Number:	ER093631
Signature IP Address:	134.238.168.45
Signature Date:	2024-12-09
Signature Hash:	B89EBE94DF2E6E1C33E47151605FCD206A4EF9DD55C2CD85EA5F4E3DD143F2B0
Form Hash Code at time of Signature:	BFAF2B7160E81685ED8407359460FB38FF679BDC794B5E228612271B236B024A

Submission

Reference Number:	The application reference number is 713033
Submitted by:	The application was submitted by ER093631/Hector Acosta
Submitted Timestamp:	The application was submitted on 2024-12-09 at 16:36:44 CST
Submitted From:	The application was submitted from IP address 134.238.168.45
Confirmation Number:	The confirmation number is 593250
Steers Version:	The STEERS version is 6.83
Permit Number:	The permit number is 2191

Additional Information

Application Creator: This account was created by Jie Q Li