

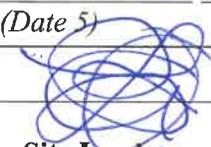
Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program
Texas Commission on Environmental Quality

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: 100221589	
CN: 600269617	
Account No.: HG-0459-J	
Permit No.: O1581	
Project No.: 37474	
Area Name: Blending, Storage, and Loading	
Company Name: The Lubrizol Corporation	
II. Certification Type <i>(Please mark appropriate box)</i>	
<input type="checkbox"/> Responsible Official Representative	<input checked="" type="checkbox"/> Duly Authorized Representative
III. Submittal Type <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>	
<input type="checkbox"/> SOP/TOP Initial Permit Application	<input type="checkbox"/> Permit Revision, Renewal, or Reopening
<input type="checkbox"/> GOP Initial Permit Application	<input checked="" type="checkbox"/> Update to Permit Application
<input type="checkbox"/> Other: _____	

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			
This certification does not extend to information which is designated by TCEQ as information for reference only.			
I, <u>Julio Rodriguez</u>		certify that I am the <u>DAR</u>	
<i>(Certifier Name printed or typed)</i>		<i>(RO or DAR)</i>	
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:			
<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>			
Time Period: From <u>01/06/2025</u>		to <u>01/07/2026</u>	
<i>(Start Date)</i>		<i>(End Date)</i>	
Specific Dates: _____			
<i>(Date 1)</i>		<i>(Date 2)</i>	
<i>(Date 3)</i>		<i>(Date 4)</i>	
<i>(Date 5)</i>		<i>(Date 6)</i>	
Signature: 		Signature Date: <u>01/09/2026</u>	
Title: <u>Site Leader</u>			

From: [Li, Debbie](#)
To: [Emily Knodell](#)
Cc: [tammy.hartmann@tricordconsulting.com](#); [Txenv](#)
Subject: RE: Working Draft Permit -- FOP O1581/Project 37474, The Lubrizol Corporation/Deer Park Plant
Date: Tuesday, January 13, 2026 2:18:18 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[Signed OP-CRO1 1.9.2026.pdf](#)

Emily,

Attached is the signed OP-CRO1 form, certifying the recent changes made to the application. The original signed hard copy will be sent via mail. Please find below the updated technical contact information for FOP O15181.

Technical Contact:
<Name> **Debbie Li**
<Title> **Environmental Engineer**
<Company> **The Lubrizol Corporation**
<Address> **#41 Tidal Road, Deer Park, TX 77536**
Phone: **(832) 260-7504**
Email: **TXENV@Lubrizol.com**

Debbie

From: Emily Knodell <Emily.Knodell@tceq.texas.gov>
Sent: Wednesday, January 7, 2026 3:26 PM
To: Li, Debbie <Debbie.Li@Lubrizol.com>
Cc: tammy.hartmann@tricordconsulting.com; Txenv <TXENV@Lubrizol.com>
Subject: [EXTERNAL] RE: Working Draft Permit -- FOP O1581/Project 37474, The Lubrizol Corporation/Deer Park Plant

Good afternoon Ms. Li,

Thank you for your review and approval of the draft. I am now preparing this project for management review. Please resolve the following items by **01/14/2026**.

1. **Contact Info:** Please provide information as listed below for the Technical Contact/Permit Consultant, I believe the information we have for the technical contact is outdated (we still have Eyad Elzaibak listed). This will be for my project files, and the technical contact will also be the public notice contact.

Technical Contact:
<Name>
<Title>
<Company>
<Address>
Phone: <Phone>
Email: <Email>

Permit Consultant:
<Name>
<Title>
<Company>
<Address>
Phone: <Phone>
Email: <Email>

2. **Form OP-CRO1:** At this time, I would like to ask for the form OP-CRO1 certifying the changes made to the application. Please fill out the Time Period from January 6, 2025 to January 7, 2026. Please send me an electronic copy and the original, signed hardcopy. Alternatively, in lieu of the OP-CRO1, you can submit this email thread and attachments as an update to the application through STEERS (preferred method). 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. STEERS does not accept the Outlook ".msg" file type, but it does take PDFs.

Let me know if you have any questions.

Best Regards,

Emily L. Knodell
Permit Reviewer
TCEQ – APD – OP Section (Title V)
(512) 239-3107



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

From: Li, Debbie <Debbie.Li@Lubrizol.com>
Sent: Monday, January 5, 2026 9:12 AM

From: [Li, Debbie](#)
To: [Emily Knodell](#)
Cc: [tammy.hartmann@tricordconsulting.com](#); [Txenv](#)
Subject: RE: Working Draft Permit -- FOP 01581/Project 37474, The Lubrizol Corporation/Deer Park Plant
Date: Monday, January 5, 2026 9:11:58 AM
Attachments: [image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)

Emily,

We have no further comments/changes to the Working Draft Permit for O1581/Project 37474. Thank you.

Debbie

From: Emily Knodell <Emily.Knodell@tceq.texas.gov>
Sent: Tuesday, December 23, 2025 1:22 PM
To: Li, Debbie <Debbie.Li@Lubrizol.com>
Cc: [tammy.hartmann@tricordconsulting.com](#); [Txenv](#) <TXENV@Lubrizol.com>
Subject: [EXTERNAL] RE: Working Draft Permit -- FOP 01581/Project 37474, The Lubrizol Corporation/Deer Park Plant

Good afternoon Ms. Li,

I discussed this with my management, and they allowed me to add the compliance schedule back into the draft permit. It should now match exactly with what's in the effective permit.

Please review the revised permit and approve it by **01/05/2025**.

Since this is a follow-up review to the previously submitted and reviewed WDP, only comments concerning changes since the last WDP may be considered by TCEQ. Any comments outside the scope of the most recent changes should be submitted as a separate project.

Let me know if you have any questions. Wishing you a wonderful Holiday Season!

Best Regards,

Emily L. Knodell
Permit Reviewer
TCEQ – APD – OP Section (Title V)
(512) 239-3107



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

From: Li, Debbie <Debbie.Li@Lubrizol.com>
Sent: Friday, November 14, 2025 11:44 AM
To: Emily Knodell <Emily.Knodell@tceq.texas.gov>
Cc: [tammy.hartmann@tricordconsulting.com](#); [Txenv](#) <TXENV@Lubrizol.com>
Subject: RE: Working Draft Permit -- FOP 01581/Project 37474, The Lubrizol Corporation/Deer Park Plant

Emily,

Lubrizol respectfully requests to retain the compliance schedule as presented in WDP #1 provided on 10/14/2025, as the Corrective Action Plan has not yet been completed and the audit remains ongoing.

Debbie

From: Emily Knodell <Emily.Knodell@tceq.texas.gov>
Sent: Friday, November 14, 2025 10:54 AM
To: Li, Debbie <Debbie.Li@Lubrizol.com>
Cc: [tammy.hartmann@tricordconsulting.com](#); [Txenv](#) <TXENV@Lubrizol.com>
Subject: [EXTERNAL] RE: Working Draft Permit -- FOP 01581/Project 37474, The Lubrizol Corporation/Deer Park Plant

Good morning Ms. Li,

I have looked into your request to update the language to indicate that the incinerator is in service. From looking at your effective permit, I can see the Compliance Schedule lists one milestone (shown below for ease of reference) that refers to dates that have already passed. In minor revision projects, we can only delete Compliance Plans or milestones and are not permitted to add anything to them. Based on your request from 10/14 and the supporting OP-ACPS you provided on 10/20; I have already removed the Compliance Schedule from the permit. Additionally, due to the fact that D-31 is in service and milestone #1 has been completed, this Compliance Schedule should no longer be in the permit because the information is outdated. If we were to reverse this change, we would need to change this project from a minor revision into a significant revision which will require public notice instead of public announcement. This means the project will run the risk of receiving public comments. Form OP-ACPS sent 10/20 has the correct information (B.1. answered "Yes" and B.2. answered "No"), while the one from 10/29 does not have the correct responses. I will default back to the one from 10/20 and this information is what will go into our database. I know you mentioned that Lubrizol wants the language to indicate that the incinerator is still in service. It is clear by looking at the draft permit (sent 10/28) that Unit ID D-31 is in service, as it is already included in the Unit Summary Table (Draft Page 22), Applicable Requirements Summary Table (Draft Page 82), Periodic Monitoring Summary Table (Draft Page

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

Date: 10/29/2025	Regulated Entity No.: RN100221589	Permit No.: O1581
Company Name: The Lubrizol Corporation		Area Name: Blending, Storage and Loading (BSL) Unit

Part 2

A. Compliance Schedule		
If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. <i>(See form instruction for details.)</i> If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.		
1. Specific Non-Compliance Situation		
Unit/Group/Process ID No.(s): D-31		
SOP Index No.: 60KB-0004		
Pollutant: VOC		
Applicable Requirement		
Citation	Text Description	
[G]§60.112b(a)(3)	A closed vent system operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background and visual inspections and control device designed and operated to reduce inlet VOC emissions by > 95 percent.	
2. Compliance Status Assessment Method and Records Location		
Citation	Text Description	Location of Records/Documentation
[G]§60.113b(c)(1)	Demonstration that control device will achieve required control efficiency during maximum loading conditions	Records not available
3. Non-compliance Situation Description		
Failed to have proper controls on storage tank		
4. Corrective Action Plan Description		
The site will install an incinerator to properly control storage tank VOC emissions		
5. List of Activities/Milestones to Implement the Corrective Action Plan		
Non-compliance of D-31 with NSPS Kb control requirements has been disclosed to TCEQ under Texas Audit Privilege Act Investigation No. 1532920 (approved 11/19/2018). Lubrizol submitted a New Source Review permit application to TCEQ in 1Q 2022 to authorize construction of an incinerator and back-up flare to meet the VOC control requirements of NSPS Kb. The permit amendment was issued on July 11, 2023. The actual date of initial startup of the incinerator occurred on October 4, 2025. Lubrizol is completing commissioning activities necessary to demonstrate the control efficiency of the control devices.		

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

Date: 10/29/2025	Regulated Entity No.: RN100221589	Permit No.: O1581
Company Name: The Lubrizol Corporation		Area Name: Blending, Storage and Loading (BSL) Unit

Part 2 (continued)

6. Previously Submitted Compliance Plan(s)	
Type of Action	Date Submitted
N/A	N/A
7. Progress Report Submission Schedule	
Next progress report to be submitted on/before 04/30/2026.	

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

Date: 10/29/2025	Regulated Entity No.: RN100221589	Permit No.: O1581
Company Name: The Lubrizol Corporation		Area Name: Blending, Storage and Loading (BSL) Unit

- 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

A. Compliance Plan — Future Activity Committal Statement	
<p>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.</p>	
B. 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?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> 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>	
<p>* For Site Operating Permits (SOPs), the complete application should be consulted for applicable requirements and their corresponding emission units when assessing compliance status. For General Operating Permits (GOPs), the application documentation, particularly Form OP-REQ1 should be consulted as well as the requirements contained in the appropriate General Permits portion of 30 TAC Chapter 122.</p> <p>Compliance should be assessed based, at a minimum, on the required monitoring, testing, record keeping, and/or reporting requirements, as appropriate, associated with the applicable requirement in question.</p>	

132-136), and New Source Review Authorization References by Emissions Unit Table (Draft Page 180). Please acknowledge that you have read and understood this message as well and let me know if you approve the Working Draft Permit (WDP) that I sent on 10/28.

Compliance Schedule

A. Compliance Schedule				
1. Specific Non-Compliance Situation				
Unit/Group/ Process ID. No(s).	SOP Index No.	Pollutant	Applicable Requirement	
			Citation	Text Description
D-31	60KB-0004	VOC	[G]§60.112b(a)(3)	A closed vent system operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background and visual inspections and control device designed and operated to reduce inlet VOC emissions by > 95 percent.
2. Compliance Status Assessment Method and Records Location				
Compliance Status Assessment Method			Location of Records/Documentation	
Citation	Text Description		Records not available.	
[G]§60.113b(c)(1)	Demonstration that control device will achieve required control efficiency during maximum loading conditions.			
3. Non-compliance Situation Description				
Failed to have proper controls on storage tank.				
4. Corrective Action Plan Description				
The site will install an incinerator to properly control storage tank VOC emissions.				
5. List of Activities/Milestones to Implement the Corrective Action Plan				
1	Non-compliance of D-31 with NSPS Kb control requirements has been disclosed to TCEQ under Texas Audit Privilege Act Investigation No. 1532920 (approved 11/19/2018). Lubrizol submitted a New Source Review permit application to TCEQ in 1Q 2022 to authorize construction of the incinerator and plans to install the incinerator by 4Q 2023.			
6. Previously Submitted Compliance Plan(s)	Type of Action		Date Submitted	
7. Progress Report Submission Schedule	Next progress report to be submitted on/before 08/24/2022 and every six months thereafter.			

Let me know if you have questions.

Best Regards,

Emily L. Knodell
Permit Reviewer
TCEQ – APD – OP Section (Title V)
(512) 239-3107

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

From: Li, Debbie <Debbie.Li@Lubrizol.com>
Sent: Wednesday, October 29, 2025 11:09 AM
To: Emily Knodell <Emily.Knodell@tceq.texas.gov>
Cc: tammy.hartmann@tricordconsulting.com; Txenv <TXENV@Lubrizol.com>
Subject: RE: Working Draft Permit -- FOP 01581/Project 37474, The Lubrizol Corporation/Deer Park Plant

Emily,

Rather than removing the compliance schedule from the permit, Lubrizol requests to update the language to indicate that the incinerator is in service. Please find the updated OP-ACPS form attached for your review.

Regards,

Debbie Li
Environmental Engineer

The Lubrizol Corporation
#41 Tidal Road, Deer Park, TX 77536
Office: (832) 260-7504 | Email: Debbie.Li@Lubrizol.com



From: Emily Knodell <Emily.Knodell@tceq.texas.gov>
Sent: Tuesday, October 28, 2025 11:11 AM
To: Li, Debbie <Debbie.Li@Lubrizol.com>; tammy.hartmann@tricordconsulting.com
Cc: Black, Nyx <Nyx.Black@Lubrizol.com>
Subject: [EXTERNAL] RE: Working Draft Permit -- FOP 01581/Project 37474, The Lubrizol Corporation/Deer Park Plant

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

Date: 10/20/2025	Regulated Entity No.: RN100221589	Permit No.: O1581
Company Name: The Lubrizol Corporation		Area Name: Blending, Storage and Loading (BSL) Unit

- 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

A. Compliance Plan — Future Activity Committal Statement	
<p>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.</p>	
B. 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?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> 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>	
<p>* For Site Operating Permits (SOPs), the complete application should be consulted for applicable requirements and their corresponding emission units when assessing compliance status. For General Operating Permits (GOPs), the application documentation, particularly Form OP-REQ1 should be consulted as well as the requirements contained in the appropriate General Permits portion of 30 TAC Chapter 122.</p> <p>Compliance should be assessed based, at a minimum, on the required monitoring, testing, record keeping, and/or reporting requirements, as appropriate, associated with the applicable requirement in question.</p>	

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

I. Identifying Information					
Account No.:	HG-0459-J	RN No.:	RN100221589	CN:	CN600269617
Permit No.:	O1581	Project No.:	33388		
Area Name:	Blending, Storage and Loading (BSL) Unit				
Company Name:	The Lubrizol Corporation				
II. Unit/Emission Point/Group/Process Information					
Revision No.:	50				
Unit/EPN/Group/Process ID No.:	D-31				
Applicable Form:	OP-UA3				
III. Applicable Regulatory Requirement					
Name:	40 CFR 60 Subpart Kb				
SOP/GOP Index No.:	60KB-0004				
Pollutant:	VOC				
Main Standard:	§60.112b(a)(3)(i)				
IV. Title V Monitoring Information					
Monitoring Type:	PM				
Unit Size:					
CAM/PM Option No.:	PM-V-058				
Deviation Limit:	No detectable emissions as indicated by an instrument reading of less than 500 ppm above background				
CAM/PM Option No.:	PM-V-059				
Deviation Limit:	Defects, such as cracks, holes, gaps, loose connections, or broken or missing covers or other closure devices, that could result in air emissions.				
V. Control Device Information					
Control Device ID No.:	H-001 TO-1				
Control Device Type:	DIRFLM				

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

I. Identifying Information			
Account No.:	HG-0459-J	RN No.: RN100221589	CN: CN600269617
Permit No.:	O1581	Project No.:	33388
Area Name:	Blending, Storage and Loading (BSL) Unit		
Company Name:	The Lubrizol Corporation		
II. Unit/Emission Point/Group/Process Information			
Revision No.:	50		
Unit/EPN/Group/Process ID No.:	D-31		
Applicable Form:	OP-UA3		
III. Applicable Regulatory Requirement			
Name:	40 CFR 60 Subpart Kb		
SOP/GOP Index No.:	60KB-0004		
Pollutant:	VOC		
Main Standard:	§60.112b(a)(3)(ii)		
IV. Title V Monitoring Information			
Monitoring Type:	PM		
Unit Size:	SM		
CAM/PM Option No.:	PM-V-007		
Deviation Limit:	Maintain combustion temperature above 1500 deg F in the combustion chamber or immediately downstream of the combustion chamber.		
CAM/PM Option No.:			
Deviation Limit:			
V. Control Device Information			
Control Device ID No.:	H-001	TO-1	
Control Device Type:	DIRFLM		

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

I. Identifying Information			
Account No.:	HG-0459-J	RN No.: RN100221589	CN: CN600269617
Permit No.:	O1581	Project No.:	37474
Area Name:	Blending, Storage and Loading (BSL) Unit		
Company Name:	The Lubrizol Corporation		
II. Unit/Emission Point/Group/Process Information			
Revision No.:	1		
Unit/EPN/Group/Process ID No.:	D-31		
Applicable Form:	OP-UA3		
III. Applicable Regulatory Requirement			
Name:	40 CFR 60 Subpart Kb		
SOP/GOP Index No.:	60KB-0005a		
Pollutant:	VOC		
Main Standard:	§60.112b(a)(3)(i)		
IV. Title V Monitoring Information			
Monitoring Type:	PM		
Unit Size:			
CAM/PM Option No.:	PM-V-058		
Deviation Limit:	No detectable emissions as indicated by an instrument reading of less than 500 ppm above background		
CAM/PM Option No.:	PM-V-059		
Deviation Limit:	Defects, such as cracks, holes, gaps, loose connections, or broken or missing covers or other closure devices, that could result in air emissions.		
V. Control Device Information			
Control Device ID No.:	FR-001 FR-3		
Control Device Type:	FLARE		

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

I. Identifying Information			
Account No.:	HG-0459-J	RN No.: RN100221589	CN: CN600269617
Permit No.:	O1581	Project No.:	37474
Area Name:	Blending, Storage and Loading (BSL) Unit		
Company Name:	The Lubrizol Corporation		
II. Unit/Emission Point/Group/Process Information			
Revision No.:	1		
Unit/EPN/Group/Process ID No.:	D-31		
Applicable Form:	OP-UA3		
III. Applicable Regulatory Requirement			
Name:	40 CFR 60 Subpart Kb		
SOP/GOP Index No.:	60KB-0005a		
Pollutant:	VOC		
Main Standard:	§60.112b(a)(3)(ii)		
IV. Title V Monitoring Information			
Monitoring Type:	PM		
Unit Size:			
CAM/PM Option No.:	PM-V-003		
Deviation Limit:	Monitoring data which indicates the lack of a pilot flame shall be considered a deviation.		
CAM/PM Option No.:			
Deviation Limit:			
V. Control Device Information			
Control Device ID No.:	FR-001 FR-3		
Control Device Type:	FLARE		

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	O1581	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	05/08/2025				
669	10/16/2025				

- ◆ **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

Good morning Ms. Li,

Please find an electronic copy of the Working Draft Permit (WDP) attached for your review. This WDP contains the requested updates as summarized below:

Summary of Changes:

- Updated control device IDs according to OP-MONS provided 10/20 (Draft, pages 132-136).
- Updated New Source Review Authorization References according to OP-REQ1 (Page 89) provided 10/20 (Draft page 174).
- Removed Compliance Schedule.

Please review the WDP and submit to me any comments you have by **November 4, 2025**.

You may notice a few items highlighted in **green** inside the draft. These just help me keep track of any changes made and will be removed when the project is ready for management review.

Since this is a follow-up review to the previously submitted and reviewed WDP, only comments concerning changes since the last WDP may be considered by TCEQ. Any comments outside the scope of the most recent changes should be submitted as a separate project.

Let me know if you have any questions.

Best Regards,

Emily L. Knodell
Permit Reviewer
TCEQ – APD – OP Section (Title V)
(512) 239-3107



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

From: Emily Knodell
Sent: Monday, October 20, 2025 1:29 PM
To: Li, Debbie <Debbie.Li@Lubrizol.com>; tammy.hartmann@tricordconsulting.com
Cc: Black, Nyx <Nyx.Black@Lubrizol.com>
Subject: RE: Working Draft Permit -- FOP O1581/Project 37474, The Lubrizol Corporation/Deer Park Plant

Received, thank you!

Emily L. Knodell
Permit Reviewer
TCEQ – APD – OP Section (Title V)
(512) 239-3107



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

From: Li, Debbie <Debbie.Li@Lubrizol.com>
Sent: Monday, October 20, 2025 11:34 AM
To: Emily Knodell <Emily.Knodell@tceq.texas.gov>; tammy.hartmann@tricordconsulting.com
Cc: Black, Nyx <Nyx.Black@Lubrizol.com>
Subject: RE: Working Draft Permit -- FOP O1581/Project 37474, The Lubrizol Corporation/Deer Park Plant

Emily,

Attached are the updated forms as requested. Please note that the issuance date for NSR permit 669 has also been updated in form OP-REQ1.

Debbie

From: Emily Knodell <Emily.Knodell@tceq.texas.gov>
Sent: Thursday, October 16, 2025 3:19 PM
To: Li, Debbie <Debbie.Li@Lubrizol.com>; tammy.hartmann@tricordconsulting.com
Cc: Black, Nyx <Nyx.Black@Lubrizol.com>
Subject: [EXTERNAL] RE: Working Draft Permit -- FOP O1581/Project 37474, The Lubrizol Corporation/Deer Park Plant

Good afternoon Ms. Li,

Thank you for your review of the WDP and providing comments. Please provide the following forms by **10/22/2025** so that I can incorporate your comments into the draft.



Periodic Monitoring Summary

Unit/Group/Process Information	
ID No.: <u>D-31</u>	
Control Device ID No.: <u>H-004_TO-1</u>	Control Device Type: <u>Thermal</u> incinerator (direct flame incinerator/regenerative thermal oxidizer)
Applicable Regulatory Requirement	
Name: <u>40</u> CFR Part 60, Subpart Kb	SOP Index No.: <u>60</u> KB-0004
Pollutant: VOC	Main Standard: <u>[G]</u> § 60.112b(a)(3)
Monitoring Information	
Indicator: <u>Combustion</u> Temperature / Exhaust Gas Temperature	
Minimum Frequency: <u>Once</u> per week	
Averaging Period: <u>N/A</u>	
Deviation Limit: <u>Maintain</u> combustion temperature above 1500 °F in the combustion chamber or immediately downstream of the combustion chamber.	
Periodic Monitoring Text: <u>Measure</u> and record the combustion temperature in the combustion chamber or immediately downstream of the combustion chamber. The monitoring instrumentation shall be maintained, calibrated and operated in accordance with manufacturer's specifications or other written procedures. Any monitoring data below the minimum limit shall be considered and reported as a deviation.	



Periodic Monitoring Summary

Unit/Group/Process Information	
ID No.: <u>D-31</u>	
Control Device ID No.: <u>H-004TO-1</u>	Control Device Type: <u>Thermal</u> incinerator (direct flame incinerator/regenerative thermal oxidizer)
Applicable Regulatory Requirement	
Name: <u>40</u> CFR Part 60, Subpart Kb	SOP Index No.: <u>60</u> KB-0004
Pollutant: VOC	Main Standard: <u>[G]</u> § 60.112b(a)(3)
Monitoring Information	
Indicator: VOC Concentration	
Minimum Frequency: <u>Once</u> per year	
Averaging Period: <u>N/A</u>	
Deviation Limit: <u>No</u> detectable emissions as indicated by an instrument reading of less than 500 ppm above background.	
Periodic Monitoring Text: <u>Measure</u> and record fugitive emissions from the vapor collection system in accordance with part 60, appendix A, method 21.	

Periodic Monitoring Summary

Unit/Group/Process Information	
ID No.: <u>D-31</u>	
Control Device ID No.: <u>H-004TO-1</u>	Control Device Type: <u>Thermal</u> incinerator (direct flame incinerator/regenerative thermal oxidizer)
Applicable Regulatory Requirement	
Name: <u>40</u> CFR Part 60, Subpart Kb	SOP Index No.: <u>60KB-0004</u>
Pollutant: VOC	Main Standard: <u>[G]</u> § 60.112b(a)(3)
Monitoring Information	
Indicator: Visual Inspection	
Minimum Frequency: <u>Once</u> per year	
Averaging Period: <u>N/A</u>	
Deviation Limit: <u>Defects</u> , such as cracks, holes, gaps, loose connections, or broken or missing covers or other closure devices, that could result in air emissions.	
Periodic Monitoring Text: <u>Visually</u> inspect all components of the vapor collection system for defects, such as cracks, holes, gaps, loose connections, or broken or missing covers or other closure devices, that could result in air emissions.	

Periodic Monitoring Summary

Unit/Group/Process Information	
ID No.: <u>D-31</u>	
Control Device ID No.: <u>FR-3004</u>	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: <u>40</u> CFR Part 60, Subpart Kb	SOP Index No.: <u>60</u> KB-0005a
Pollutant: VOC	Main Standard: <u>[G]</u> § 60.112b(a)(3)
Monitoring Information	
Indicator: VOC Concentration	
Minimum Frequency: <u>Once</u> per year	
Averaging Period: <u>N/A</u>	
Deviation Limit: <u>No</u> detectable emissions as indicated by an instrument reading of less than 500 ppm above background.	
Periodic Monitoring Text: <u>Measure</u> and record fugitive emissions from the vapor collection system in accordance with part 60, appendix A, method 21.	

Periodic Monitoring Summary

Unit/Group/Process Information	
ID No.: <u>D-31</u>	
Control Device ID No.: <u>FR-3004</u>	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: <u>40</u> CFR Part 60, Subpart Kb	SOP Index No.: <u>60KB-0005a</u>
Pollutant: VOC	Main Standard: <u>[G]</u> § 60.112b(a)(3)
Monitoring Information	
Indicator: Visual Inspection	
Minimum Frequency: <u>Once</u> per year	
Averaging Period: <u>N/A</u>	
Deviation Limit: <u>Defects</u> , such as cracks, holes, gaps, loose connections, or broken or missing covers or other closure devices, that could result in air emissions.	
Periodic Monitoring Text: <u>Visually</u> inspect all components of the vapor collection system for defects, such as cracks, holes, gaps, loose connections, or broken or missing covers or other closure devices, that could result in air emissions.	

New Source Review Authorization References

The New Source Review authorizations listed in the table below are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 669	Issuance Date: <u>09/30/2024</u>
Authorization No.: 22046	Issuance Date: 07/11/2023 <u>05/08/2025</u>
Authorization No.: 122494	Issuance Date: <u>10/01/2014</u>
Authorization No.: 131877	Issuance Date: <u>05/26/2015</u>
Authorization No.: 159943	Issuance Date: <u>02/14/2020</u>
Authorization No.: 162907	Issuance Date: <u>10/27/2020</u>
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.261	Version No./Date: <u>11/01/2003</u>
Number: 106.262	Version No./Date: <u>11/01/2003</u>
Number: 106.263	Version No./Date: <u>11/01/2001</u>
Number: 106.472	Version No./Date: <u>09/04/2000</u>

Compliance Schedule



Li, Debbie



Remove the compliance schedule, as D-31 is now controlled by the new incinerator TO-1 or the back-up flare FR-3.

Reply

A. Compliance Schedule				
1. Specific Non-Compliance Situation				
Unit/Group/ Process ID. No(s).	SOP Index No.	Pollutant	Applicable Requirement	
			Citation	Text Description
D-31	60KB-0004	VOC	[G]§60.112b(a)(3)	A closed vent system operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background and visual inspections and control device designed and operated to reduce inlet VOC emissions by > 95 percent.
2. Compliance Status Assessment Method and Records Location				
Compliance Status Assessment Method			Location of Records/Documentation	
Citation	Text Description			
[G]§60.113b(c)(1)	Demonstration that control device will achieve required control efficiency during maximum loading conditions.		Records <u>not</u> available.	
3. Non-compliance Situation Description				
Failed to have proper controls on storage tank.				
4. Corrective Action Plan Description				
The site will install an incinerator to properly control storage tank VOC emissions.				
5. List of Activities/Milestones to Implement the Corrective Action Plan				
1	Non-compliance of D-31 with NSPS Kb control requirements has been disclosed to TCEQ under Texas Audit Privilege Act Investigation No. 1532920 (approved 11/19/2018). Lubrizol submitted a New Source Review permit application to TCEQ in 1Q 2022 to authorize construction of the incinerator and plans to install the incinerator by 4Q 2023.			
6. Previously Submitted Compliance Plan(s)		Type of Action		Date Submitted
		N/A		N/A
7. Progress Report Submission Schedule		Next progress report to be submitted on/before 08/24/2022 and every six months thereafter.		

1. **Form OP-MON:** Please send revised OP-MONs which list the new control device ID. It is helpful to strike out the old information using the strikethrough feature in MS Word and type the new text right next to it.
2. **Form OP-REQ1 (Page 89):** Please send a revised Form OP-REQ1 (Page 89) which lists the 05/08/2025 date in place of "TBD" for NSR 22046. Only page 89 of the OP-REQ1 is needed to make this update.

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	O1581	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, N.A Permits) for the Application Area**

Authorization No.	Issuance Date	Authorization No.	Issuance Date	Authorization No.	Issuance Date
22046	TBD				
669	9/30/2024				

- **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.

3. **Form OP-ACPS:** Please send an updated Form OP-ACPS to indicate the units are now in compliance.

Let me know if you have any questions. Thank you!

Best Regards,

Emily L. Knodell
Permit Reviewer
TCEQ – APD – OP Section (Title V)
(512) 239-3107

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

From: Li, Debbie <Debbie.Li@Lubrizol.com>
Sent: Tuesday, October 14, 2025 12:31 PM
To: Emily Knodell <Emily.Knodell@tceq.texas.gov>; tammy.hartmann@tricordconsulting.com
Cc: Black, Nyx <Nyx.Black@Lubrizol.com>
Subject: RE: Working Draft Permit -- FOP O1581/Project 37474, The Lubrizol Corporation/Deer Park Plant

Emily,

Please review our comments below regarding O1582 WDP#1 and refer to the attached document for details:

1. **Periodic Monitoring Summary:**
 - o Change the control Device ID No from "H-001" to "TO-1" and change from "FR-001" to "FR-3"
2. **New Source Review Authorization References Table:**
 - o Update the NSR permit 22046 issuance date from "07/11/2023" to "05/08/2025"
3. **Compliance Schedule:**
 - o Remove the compliance schedule, as D-31 is now controlled by the new incinerator TO-1 or the back-up flare FR-3.

Regards,

Debbie Li
Environmental Engineer

The Lubrizol Corporation
#41 Tidal Road, Deer Park, TX 77536
Office: (832) 260-7504 | Email: Debbie.Li@Lubrizol.com



From: Emily Knodell <Emily.Knodell@tceq.texas.gov>
Sent: Thursday, October 2, 2025 8:48 AM
To: tammy.hartmann@tricordconsulting.com
Cc: Li, Debbie <Debbie.Li@Lubrizol.com>
Subject: [EXTERNAL] Working Draft Permit -- FOP O1581/Project 37474, The Lubrizol Corporation/Deer Park Plant

Good morning Ms. Debbie Li and Ms. Tammy Hartmann

I have conducted a technical review of *revision* application for *The Lubrizol Corporation/Deer Park Plant*. An electronic copy of the Working Draft Permit (WDP) is attached for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided.

Please review the WDP and submit to me any comments you have by **October 31, 2025**.

Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

Please review the second portion of the "SOP Technical Review Fact Sheet" located at http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf. This guidance contains important information regarding WDP review and comment procedures.

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

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

Please notify me when these updates have been submitted.

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

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

Thank you for your cooperation.

Sincerely,

Emily L. Knodell
Permit Reviewer
TCEQ – APD – OP Section (Title V)
(512) 239-3107



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

From: Emily Knodell
Sent: Tuesday, August 19, 2025 2:36 PM
To: Tammy Hartmann <tammy.hartmann@tricordconsulting.com>
Cc: Li, Debbie <Debbie.Li@lubrizol.com>
Subject: RE: Technical Review -- FOP O1581/Project 37474, The Lubrizol Corporation/Deer Park Plant

Understood. Thank you.

Emily L. Knodell
Permit Reviewer
TCEQ – APD – OP Section (Title V)
(512) 239-3107



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

From: Tammy Hartmann <tammy.hartmann@tricordconsulting.com>
Sent: Tuesday, August 19, 2025 2:29 PM
To: Emily Knodell <Emily.Knodell@tceq.texas.gov>
Cc: Li, Debbie <Debbie.Li@lubrizol.com>; Tammy Hartmann <tammy.hartmann@tricordconsulting.com>
Subject: RE: Technical Review -- FOP O1581/Project 37474, The Lubrizol Corporation/Deer Park Plant

Good afternoon Emily,

It is our intention to add the one new citation (§63.2450(u)) to the standard. All other citations will remain the same.

Sincerely,

Tammy Hartmann

TRICORD CONSULTING, LLC

945 McKinney St., Ste 389
 Houston, TX 77002
 Cell: (832) 512-7657
 E-mail: tammy.hartmann@tricordconsulting.com
 Web: www.TRICORDconsulting.com

From: Emily Knodell <Emily.Knodell@tceq.texas.gov>
Sent: Tuesday, August 19, 2025 2:21 PM
To: Tammy Hartmann <tammy.hartmann@tricordconsulting.com>
Cc: Li, Debbie <Debbie.Li@lubrizol.com>
Subject: RE: Technical Review -- FOP O1581/Project 37474, The Lubrizol Corporation/Deer Park Plant

Good afternoon Ms. Debbie Li and Ms. Tammy Hartmann,

I just had a few questions on Form OP-REQ3 Table 2b: Deletions. Please provide a response by **08/26/2025**.

- Form OP-REQ3:** For Unit ID PROMONBSLMCPU, I wanted to make sure that it is your intention to add Applicable Regulatory Requirement Standard(s) citation §63.2450(u) because I see it in both the "Additions" Table 1a and "Deletions" Table 2a in the OP-REQ3 sent on 02/12. I do see in the OP-2 that you mentioned "one new citation is being added to the Standard as a result of the MON RTR rule change effective 08/12/2023. Citation added is shown in bold text in OP-REQ3 Table 1". I just want to make sure that this is the only change you are requesting for this unit and that adding it is what you would like to do. Also, it looks like the Recordkeeping Requirements and Reporting Requirements are nearly identical in Form OP-REQ3 (Page 4) Table 2b Deletions as shown below, was this intentional to include these on the Deletions Table?

**Applicable Requirements Summary
 Form OP-REQ3 (Page 4)
 Federal Operating Permit Program
 Table 2b: Deletions**

Date: 12/09/2024 updated 2/12/2025		Regulated Entity No.: 100221589		Permit No.: O1581			
Company Name: The Lubrizol Corporation		Area Name: Blending, Storage, and Loading					
Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
10	PROMONBSLMCPU	63FFFF-MCPU3	112(B) HAPS	§63.2445(d)	§63.2525 §63.2525(a) [G]§63.2525(b) §63.2525(c) §63.2525(f) §63.2525(g)	§63.2435(d); §63.2445(c); §63.2450(g)(5); §63.2450(m); §63.2450(m)(1); §63.2450(m)(2); §63.2515(a); §63.2515(b)(1); §63.2515(c); §63.2520(a); [G]§63.2520(b); [G]§63.2520(c); [G]§63.2520(d); §63.2520(e); §63.2520(e)(1); [G]§63.2520(e)(10); §63.2520(e)(2); §63.2520(e)(3); §63.2520(e)(4); §63.2520(e)(5); §63.2520(e)(5)(i); [G]§63.2520(e)(5)(ii); [G]§63.2520(e)(5)(iii); §63.2520(e)(6); §63.2520(e)(7); §63.2520(e)(9)	§63.2435(d) §63.2445(c) §63.2450(g)(5) §63.2450(m) §63.2450(m)(1) §63.2450(m)(2) §63.2460(c)(1) §63.2515(a) §63.2515(b)(1) §63.2515(c) §63.2520(a) [G]§63.2520(b) [G]§63.2520(c) [G]§63.2520(d) §63.2520(e) §63.2520(e)(1) §63.2520(e)(2) §63.2520(e)(3) §63.2520(e)(4) §63.2520(e)(5) §63.2520(e)(5)(i) [G]§63.2520(e)(5)(ii) [G]§63.2520(e)(5)(iii) §63.2520(e)(6) §63.2520(e)(7) §63.2520(e)(9) [G]§63.2520(e)(10)

TCEQ 10018 (APDG 5939v2, Revised 06/15) OP-REQ3 - Applicable Requirements Summary
 This form is for use by sources subject to air quality permit requirements and may be revised periodically. (Title V Release 11/08)

Let me know if you have any questions. Thank you!

Best Regards,

Emily L. Knodell
 Permit Reviewer
 TCEQ – APD – OP Section (Title V)
 (512) 239-3107

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

From: Emily Knodell
Sent: Thursday, February 13, 2025 3:01 PM
To: Tammy Hartmann <tammy.hartmann@tricordconsulting.com>
Cc: Li, Debbie <Debbie.Li@lubrizol.com>
Subject: RE: Technical Review -- FOP O1581/Project 37474, The Lubrizol Corporation/Deer Park Plant

Received, thank you!

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

Date:	12/09/2024 <i>updated 2/12/2025</i>
Permit No.:	O1581
Regulated Entity No.:	100221589
Company / Area Name:	The Lubrizol Corporation / Blending, Storage, and Loading

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		
9	MS-C	No	BSL-FUG	OP-REQ3 OP-UA1	669	Remove existing 'high level' 40 CFR 63 Subpart FFFF applicability per OP-REQ3 Table 2 Add citation-level 40 CFR 63 Subpart FFFF applicability per OP-REQ3 Table 1 and OP-UA1 (the MON UA forms have not been updated since the MON RTR rule revision; therefore OP-UA1 and OP-REQ3 Table 1 are being submitted to incorporate specific citations).
10	MS-C	No	PROMONBSLMCPU	OP-REQ3 OP-UA60	669	Remove existing 40 CFR Part 63, Subpart FFFF applicability per OP-REQ3 Table 2 Add updated 40 CFR Part 63, Subpart FFFF applicability per OP-UA60 Table 5 with modification shown in OP-REQ3 Table 1 (one new citation is being added to the Standard as a result of the MON RTR rule change effective 8/12/2023). Citation added is shown in bold text in OP-REQ3 Table 1.

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

I. Identifying Information			
Account No.:	HG-0459-J	RN No.: RN100221589	CN: CN600269617
Permit No.:	O1581	Project No.:	37474
Area Name:	Blending, Storage and Loading (BSL) Unit		
Company Name:	The Lubrizol Corporation		
II. Unit/Emission Point/Group/Process Information			
Revision No.:	1		
Unit/EPN/Group/Process ID No.:	D-31		
Applicable Form:	OP-UA3		
III. Applicable Regulatory Requirement			
Name:	40 CFR 60 Subpart Kb		
SOP/GOP Index No.:	60KB-0005a		
Pollutant:	VOC		
Main Standard:	§60.112b(a)(3)(i)		
IV. Title V Monitoring Information			
Monitoring Type:	PM		
Unit Size:			
CAM/PM Option No.:	PM-V-058		
Deviation Limit:	No detectable emissions as indicated by an instrument reading of less than 500 ppm above background		
CAM/PM Option No.:	PM-V-059		
Deviation Limit:	Defects, such as cracks, holes, gaps, loose connections, or broken or missing covers or other closure devices, that could result in air emissions.		
V. Control Device Information			
Control Device ID No.:	FR-001		
Control Device Type:	FLARE		

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

I. Identifying Information			
Account No.:	HG-0459-J	RN No.: RN100221589	CN: CN600269617
Permit No.:	O1581	Project No.:	37474
Area Name:	Blending, Storage and Loading (BSL) Unit		
Company Name:	The Lubrizol Corporation		
II. Unit/Emission Point/Group/Process Information			
Revision No.:	1		
Unit/EPN/Group/Process ID No.:	D-31		
Applicable Form:	OP-UA3		
III. Applicable Regulatory Requirement			
Name:	40 CFR 60 Subpart Kb		
SOP/GOP Index No.:	60KB-0005a		
Pollutant:	VOC		
Main Standard:	§60.112b(a)(3)(ii)		
IV. Title V Monitoring Information			
Monitoring Type:	PM		
Unit Size:			
CAM/PM Option No.:	PM-V-003		
Deviation Limit:	Monitoring data which indicates the lack of a pilot flame shall be considered a deviation.		
CAM/PM Option No.:			
Deviation Limit:			
V. Control Device Information			
Control Device ID No.:	FR-001		
Control Device Type:	FLARE		

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

Date:	12/09/2024 updated 2/12/2025	Regulated Entity No:	100221589	Permit No.:	O1581
Company Name:	The Lubrizol Corporation	Area Name:	Blending, Storage, and Loading		

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)
9	BSL-FUG	OP-UA1	63FFFF-FUG1	112(B) HAPS	40 CFR Part 63, Subpart FFFF	§63.2480 - Table 6.1.a.i. [G]§63.2480(b) §63.2480(d) §63.2480(f)(4)-(8)

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

Date:	12/09/2024 updated 2/12/2025	Regulated Entity No:	100221589	Permit No.:	O1581
Company Name:	The Lubrizol Corporation	Area Name:	Blending, Storage, and Loading		

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)
10	PROMONBSLMCPU	OP-UA60	63FFFF-MCPU3	112(B) HAPS	40 CFR Part 63, Subpart FFFF	§63.2440(a) §63.2450(a) §63.2450(l) §63.2450(u)

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

Date:	12/09/2024 updated 2/12/2025	Regulated Entity No	100221589	Permit No.:	O1581
Company Name:	The Lubrizol Corporation	Area Name:	Blending, Storage, and Loading		

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
9	BSL-FUG	63FFFF-FUG1	112(B) HAPS	[G]§63.1023	[G]§63.1038	[G]§63.1039

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

Date: 12/09/2024 updated 2/12/2025	Regulated Entity No 100221589	Permit No.: O1581
Company Name: The Lubrizol Corporation	Area Name: Blending, Storage, and Loading	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
10	PROMONBSLMCPU	63FFFF-MCPU3	112(B) HAPS	§63.2445(d)	§63.2525 §63.2525(a) [G]§63.2525(b) §63.2525(c) §63.2525(f) §63.2525(j)	§63.2435(d); §63.2445(c); §63.2450(g)(5); §63.2450(m); §63.2450(m)(1); §63.2450(m)(2); §63.2515(a); §63.2515(b)(1); §63.2515(c); §63.2520(a); [G]§63.2520(b); [G]§63.2520(c); [G]§63.2520(d); §63.2520(e); §63.2520(e)(1); [G]§63.2520(e)(10); §63.2520(e)(2); §63.2520(e)(3); §63.2520(e)(4); §63.2520(e)(5); §63.2520(e)(5)(i); [G]§63.2520(e)(5)(ii); [G]§63.2520(e)(5)(iii); §63.2520(e)(6); §63.2520(e)(7); §63.2520(e)(9)

**Applicable Requirements Summary
Federal Operating Permit Program
Form OP-REQ3 (Page 3)
Table 2a: Deletions**

Date:	12/09/2024 updated 2/12/2025	Regulated Entity No. 100221589	Permit No.:	O1581
Company Name:	The Lubrizol Corporation	Area Name: Blending, Storage, and Loading		

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)
9	BSL-FUG	OP-UA1	63FFFF-FUG	112(B) HAPS	40 CFR Part 63, Subpart FFFF	<p>§63.2480(a) The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 63, Subpart FFFF</p>

**Applicable Requirements Summary
Federal Operating Permit Program
Form OP-REQ3 (Page 3)
Table 2a: Deletions**

Date: 12/09/2024 updated 2/12/2025	Regulated Entity No. 100221589	Permit No.: O1581
Company Name: The Lubrizol Corporation	Area Name: Blending, Storage, and Loading	

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)
10	PROMONBSLMCPU	OP-UA60	63FFFF-MCPU3	112(B) HAPS	40 CFR Part 63, Subpart FFFF	§63.2440(a) §63.2450(a) §63.2450(l) §63.2450(u)

**Applicable Requirements Summary
Form OP-REQ3 (Page 4)
Federal Operating Permit Program
Table 2b: Deletions**

Date:	12/09/2024 <i>updated 2/12/2025</i>	Regulated Entity No.:	100221589	Permit No.:	O1581	
Company Name:	The Lubrizol Corporation	Area Name:	Blending, Storage, and Loading			

Revision No.	Unit/Group/Process ID No.	Unit/Group/ Process Applicable Form	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
9	BSL-FUG	OP-UA1	63FFFF-FUG	112(B) HAPS	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 63, Subpart FFFF	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 63, Subpart FFFF	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 63, Subpart FFFF

Applicable Requirements Summary
Form OP-REQ3 (Page 4)
Federal Operating Permit Program
Table 2b: Deletions

Date:	12/09/2024 updated 2/12/2025	Regulated Entity No.:	100221589	Permit No.:	O1581	
Company Name:	The Lubrizol Corporation	Area Name:	Blending, Storage, and Loading			

Revision No.	Unit/Group/Process ID No.	Unit/Group/ Process Applicable Form	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
10	PROMONBSLMCPU	63FFFF-MCPU3	112(B) HAPS	§63.2445(d)	§63.2525 §63.2525(a) [G]§63.2525(b) §63.2525(c) §63.2525(f) §63.2525(j)	§63.2435(d); §63.2445(c); §63.2450(g)(5); §63.2450(m); §63.2450(m)(1); §63.2450(m)(2); §63.2515(a); §63.2515(b)(1); §63.2515(c); §63.2520(a); [G]§63.2520(b); [G]§63.2520(c); [G]§63.2520(d); §63.2520(e); §63.2520(e)(1); [G]§63.2520(e)(10); §63.2520(e)(2); §63.2520(e)(3); §63.2520(e)(4); §63.2520(e)(5); §63.2520(e)(5)(i); [G]§63.2520(e)(5)(ii); [G]§63.2520(e)(5)(iii); §63.2520(e)(6); §63.2520(e)(7); §63.2520(e)(9)	§63.2435(d) §63.2445(c) §63.2450(g)(5) §63.2450(m) §63.2450(m)(1) §63.2450(m)(2) §63.2460(c)(1) §63.2515(a) §63.2515(b)(1) §63.2515(c) §63.2520(a) [G]§63.2520(b) [G]§63.2520(c) [G]§63.2520(d) §63.2520(e) §63.2520(e)(1) §63.2520(e)(2) §63.2520(e)(3) §63.2520(e)(4) §63.2520(e)(5) §63.2520(e)(5)(i) [G]§63.2520(e)(5)(ii) [G]§63.2520(e)(5)(iii) §63.2520(e)(6) §63.2520(e)(7) §63.2520(e)(9) [G]§63.2520(e)(10)

**Texas Commission on Environmental Quality
Miscellaneous Unit Attributes
Form OP-UA1 (Page 1)
Federal Operating Permit Program**

Date:	12/09/2024 <i>updated 02/12/2025</i>
Permit No.:	O1581
Regulated Entity No.:	100221589

Unit ID No.	SOP/GOP Index No.	Unit Type	Date Constructed / Placed in Service	Functionally Identical Replacement	Maximum Rated Capacity	Technical Information and Unit Description
BSL-FUG	63FFFF-FUG1	EU				Add 40 CFR 63 Subpart FFFF citation-level applicability per OP-REQ3 Table 1 [this will replace the high level applicability being removed from the permit per OP-REQ3 Table 2]

**Chemical Manufacturing/Elastomer/Thermoplastic Process Unit Attributes
Form OP-UA60 (Page 8)
Federal Operating Permit Program**

**Table 5a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic
Chemical Manufacturing - MCPU Processes**

Date:	12/09/2024 <i>updated 2/12/2025</i>	Permit No.:	O1581	Regulated Entity No.:	100221589
Area Name:	Blending, Storage, and Loading			Customer Reference No.:	600269617

Process ID No.	SOP Index No.	Ammonium Sulfate	Other Operations	63.100 CMPU	G2/<1000 Lb/Yr	2525E1
PROMONBSLMCPU	63FFFF-MCPU3	NO	YES	NO	NO	

**Chemical Manufacturing/Elastomer/Thermoplastic Process Unit Attributes
Form OP-UA60 (Page 9)
Federal Operating Permit Program**

Table 5b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

**Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic
Chemical Manufacturing - MCPU Processes**

Date:	12/09/2024 updated 2/12/2025	Permit No.:	O1581	Regulated Entity No.:	100221589
Area Name:	Blending, Storage, and Loading	Customer Reference No.:	600269617		

Process ID No.	SOP Index No.	Startup 2003	Shared Batch Vent	PUG	Startup 2002	PP Alt	Cont Proc
PROMONBSLMCPU	63FFFF-MCPU3	YES	NO	NO	YES	NO	

**Chemical Manufacturing/Elastomer/Thermoplastic Process Unit Attributes
Form OP-UA60 (Page 10)
Federal Operating Permit Program**

**Table 5c: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic
Chemical Manufacturing - MCPU Processes**

Date:	12/09/2024 <i>updated 2/12/2025</i>	Permit No.:	O1581	Regulated Entity No.:	100221589
Area Name:	Blending, Storage, and Loading	Customer Reference No.:	600269617		

Process ID No.	SOP Index No.	>1000 Lb/Yr	Reduction	New Source	HAP Metals	Fabric Filter	Small CD	Design Eval	Batch Proc Vents
PROMONBSLMCPU	63FFFF-MCPU3	NO		NO					NO

Emily L. Knodell
Permit Reviewer
TCEQ – APD – OP Section (Title V)
(512) 239-3107



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From: Tammy Hartmann <tammy.hartmann@tricordconsulting.com>
Sent: Wednesday, February 12, 2025 1:39 PM
To: Emily Knodell <Emily.Knodell@tceq.texas.gov>
Cc: Li, Debbie <Debbie.Li@lubrizol.com>; Tammy Hartmann <tammy.hartmann@tricordconsulting.com>
Subject: RE: Technical Review -- FOP O1581/Project 37474, The Lubrizol Corporation/Deer Park Plant

Good afternoon Emily,

On behalf of Ms. Debbie Li at Lubrizol, please see the attached Form OP-MON per your request. In addition, Lubrizol is providing the attached updates to the minor revision application via Forms OP-2, OP-REQ3, OP-UA1 and OP-UA60. Please let us know if you have any questions or need additional information.

Sincerely,

Tammy Hartmann

TRICORD CONSULTING, LLC
945 McKinney St., Ste 389
Houston, TX 77002
Cell: (832) 512-7657
E-mail: tammy.hartmann@tricordconsulting.com
Web: www.TRICORDconsulting.com

From: Emily Knodell <Emily.Knodell@tceq.texas.gov>
Sent: Wednesday, February 5, 2025 3:32 PM
To: Txenv <TXENV@Lubrizol.com>
Subject: [EXTERNAL] RE: Technical Review -- FOP O1581/Project 37474, The Lubrizol Corporation/Deer Park Plant

Good afternoon Ms. Debbie Li,

During technical review, the following item was found. Please resolve by **02/12/2025**.

1. **Form OP-MON:** Additional periodic monitoring is required to be documented in the permit for Unit ID D-31, Index No. 60KB-0005a for Main Standard §60.112b(a)(3)[G] for pollutant VOC. Please submit Form OP-MON with the following periodic monitoring options (PM-V-058, PM-V-059) or case-by-case periodic monitoring. (I noticed that there is existing monitoring in the effective permit for Unit ID D-31, Index No. 60KB-0004 which was added during the last renewal project).

Please let me know if you have any questions. Thank you!

Best Regards,

Emily L. Knodell
Permit Reviewer
TCEQ – APD – OP Section (Title V)
(512) 239-3107

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From: [Emily Knodell](mailto:Emily.Knodell@Lubrizol.com)
To: TXENV@Lubrizol.com
Subject: Technical Review -- FOP 01581/Project 37474, The Lubrizol Corporation/Deer Park Plant
Date: Monday, January 6, 2025 9:54:02 AM

Good morning Ms. Debbie Li,

My name is Emily Knodell and I have been assigned to the Federal Operating Permit (FOP) *minor revision* application of Permit No. **01581** for *The Lubrizol Corporation/Deer Park Plant*. This application has been assigned Project No. **37474**. 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 R6AirPermitsTX@epa.gov and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at [Where to Submit FOP Applications and Permit-Related Documents](#).

Please review the “SOP Technical Review Fact Sheet” located at http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_f

[actsheet.pdf](#). This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

I would appreciate a quick confirmation that this email has reached you.

Thank you for your cooperation.

Sincerely,

Emily L. Knodell

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

emily.knodell@tceq.texas.gov

Phone: (512) 239-3107

Fax: (512) 239-1400



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Regards,

Emily Knodell (x3107)

Permit Reviewer – Title V

Texas Commission on Environmental Quality

Title V Existing

1581

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	BLENDING, STORAGE AND LOADING
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 (###-###-####)

2814792851

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.

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

New Contact

The Lubrizol Corporation

MISS

Debbie

Li

Environmental Engineer

Site Physical Address

Domestic

41 TIDAL RD

DEER PARK

TX

77536

8322607504

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

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Hash

9053040697AC30760D15454393705DEB7D0B7AEE43D958812912F93CE0886D28

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

Expedite Title V

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

No

Certification

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

1. I am 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 1581.
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: 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:	0D3D6A3CB3BA02DB1BEDAFD8C5C5E30AFC0CA8AEA71BD647FDB520CBA30FB21F

Submission

Reference Number:	The application reference number is 713006
Submitted by:	The application was submitted by ER093631/Hector Acosta
Submitted Timestamp:	The application was submitted on 2024-12-09 at 16:36:55 CST

Submitted From:

The application was submitted from IP address
134.238.168.45

Confirmation Number:

The confirmation number is 593252

Steers Version:

The STEERS version is 6.83

Permit Number:

The permit number is 1581

Additional Information

Application Creator: This account was created by Jie Q Li



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

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

December 09, 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 O1581 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) O1581 for the Blending, Storage, and Loading Unit 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-UA3 (Storage Tank 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,

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 51

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.:	O1581		
Regulated Entity No.:	100221589		
Company / Area Name:	The Lubrizol Corporation / Blending, Storage, and Loading		
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 reg
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 type="checkbox"/> VOC <input type="checkbox"/> NO _x <input type="checkbox"/> SO ₂ <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> CO <input type="checkbox"/> Pb <input 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.:	O1581
Regulated Entity No.:	100221589
Company / Area Name:	The Lubrizol Corporation / Blending, Storage, and Loading

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	D-31	OP-UA3	22046 159943	Update NSR authorizations to include NSR Permit No. 22046 and Standard Permit 159943. Add new NSPS Kb operating scenario as provided on OP-UA3.
2	MS-A	No	SA-6	OP-SUMR	22046	Update NSR authorization to include NSR Permit No. 22046.
3	MS-A	No	D-4	OP-SUMR	22046	Update NSR authorization to include NSR Permit No. 22046.
4	MS-A	No	D-62	OP-SUMR	22046	Update NSR authorization to include NSR Permit No. 22046.
5	MS-A	No	D-78	OP-SUMR	22046	Update NSR authorization to include NSR Permit No. 22046.
6	MS-A	No	D-82	OP-SUMR	22046	Update NSR authorization to include NSR Permit No. 22046.
7	MS-A	No	SITEWIDE	OP-REQ1	22046	Incorporate NSR Permit No. 22046 into the FOP.
8	MS-A	No	SITEWIDE	OP-REQ1	669	Incorporate the latest issuance of NSR Permit No. 669 (issued 9/30/2004) into the FOP.

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	O1581	100221589

Unit/Processes 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	D-31	OP-UA3	STORAGE TANK		669 22046 159943	
	2	SA-6	OP-SUMR	STORAGE TANK		106.472/09/04/2000 22046	
	3	D-4	OP-SUMR	STORAGE TANK		106.472/09/04/2000 22046	
	4	D-62	OP-SUMR	STORAGE TANK		122494, 106.472/09/04/2000 22046	
	5	D-78	OP-SUMR	STORAGE TANK		122494, 106.472/09/04/2000 22046	
	6	D-82	OP-SUMR	STORAGE TANK		122494, 106.472/09/04/2000 22046	

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	O1581	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				
669	9/30/2024				

- ◆ **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.: O1581
Company Name: The Lubrizol Corporation	Area Name: Blending, Storage, and Loading	

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	D-31	OP-UA03	60KB-0005a	VOL	40 CFR Part 60, Subpart Kb	[G]§60.112b(a)(3) §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.: O1581
Company Name: The Lubrizol Corporation	Area Name: Blending, Storage, and Loading	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
1	D-31	60KB-0005a	VOL	§60.113b(d) §60.116b(a) §60.116b(b) §60.116b(e) §60.116b(e)(1) [G]§60.116b(e)(3) [G]§60.485(b)	§60.115b §60.115b(d)(2) §60.116b(a) §60.116b(b)	§60.115b §60.115b(d)(1) §60.115b(d)(3)

Storage Tank/Vessel Attributes
Form OP-UA3 (Page 3)
Federal Operating Permit Program
Table 3: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Kb: Standards of Performance for Volatile Organic Liquid Storage Vessels
(Including Petroleum Liquid Storage Vessels)
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
12/09/2024	O1581	100221589

Unit ID No.	SOP/GOP Index No.	Product Stored	Storage Capacity	WW Tank Control	Maximum TVP	Storage Vessel Description	AMEL ID No.	Guidepole	Reid Vapor Pressure	Control Device ID No.
D-31	60KB-0005a	VOL	40K+	NONE	0.75-11.1	CVS-FL				FR-001