### **Texas Commission on Environmental Quality**

Title V Existing 2207

**EPOXY PRODUCTS (1)** 

## Site Information (Regulated Entity)

What is the name of the permit area to be

authorized?

Does the site have a physical address?

Physical Address

Number and Street 2301 N BRAZOSPORT BLVD

City FREEPORT

 State
 TX

 ZIP
 77541

 County
 BRAZORIA

 Latitude (N) (##.#####)
 28.9825

 Longitude (W) (-###.#####)
 95.352777

 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)? RN108772245

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

BLUE CUBE OPERATIONS

Does the RE site have a physical address?

Physical Address

Number and Street 2301 N BRAZOSPORT BLVD

City FREEPORT

 State
 TX

 ZIP
 77541

 County
 BRAZORIA

 Latitude (N) (##.#####)
 28.986666

 Longitude (W) (-###.######)
 -95.379166

Facility NAICS Code

What is the primary business of this entity? CHEMICAL MANUFACTURING

## Customer (Applicant) Information

How is this applicant associated with this site?

Owner Operator
What is the applicant's Customer Number

CN604930784

(CN)?

Type of Customer Corporation

Full legal name of the applicant:

Legal Name Blue Cube Operations LLC

 Texas SOS Filing Number
 802203371

 Federal Tax ID
 131872319

 State Franchise Tax ID
 32056817540

State Sales Tax ID

Local Tax ID

DUNS Number 79829795

Number of Employees 501+

Independently Owned and Operated? No

## Responsible Official Contact

Person TCEQ should contact for questions

about this application:

Organization Name BLUE CUBE OPERATIONS LLC

Prefix MR

First MATTHEW

Middle

Last STEWART

Suffix

Credentials

Title FREEPORT SITE LEADER

Enter new address or copy one from list:

Mailing Address

Address Type Domestic

Mailing Address (include Suite or Bldg. here, if 604 HIGHWAY 332

applicable)

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

City LAKE JACKSON

State TX ZIP 77566

Phone (###-###)

Extension

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

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

E-mail fbclehs@olin.com

## **Duly Authorized Representative Contact**

Person TCEQ should contact for questions

about this application

Select existing DAR contact or enter a new GRETCHEN ABNEY(BLUE CUBE OPERA...)

9795293249

contact.

Organization Name BLUE CUBE OPERATIONS LLC

Prefix MS

First GRETCHEN

Middle

Last ABNEY

Suffix

Credentials

Title SITE ENVIRONMENTAL LEADER

Enter new address or copy one from list

Mailing Address

Address Type Domestic

Mailing Address (include Suite or Bldg. here, if 604 HIGHWAY 332

applicable)

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

City LAKE JACKSON

State TX Zip 77566

Phone (###-####) 9795293050

Extension

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

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

E-mail gbabney@olin.com

#### **Technical Contact**

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new New Contact

contact.

Organization Name Blue Cube Operations LLC

Prefix MR
First Oakley

Middle

Last Hayes

Suffix Credentials

Title Air Permit Manager

Enter new address or copy one from list:

Mailing Address

Address Type Domestic

Mailing Address (include Suite or Bldg. here, if 604 HIGHWAY 332

applicable)

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

City LAKE JACKSON

 State
 TX

 ZIP
 77566

 Phone (###-####)
 9795293365

Extension

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

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

E-mail OHayes@Olin.com

## Title V General Information - Existing

1) Permit Type: SOP

2) Permit Latitude Coordinate:28 Deg 58 Min 57 Sec3) Permit Longitude Coordinate:95 Deg 21 Min 10 Sec

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

4.1. What type of permitting action are you Streamlined Revision

applying for?
4.1.1. Are there any permits that should be

No

voided upon issuance of this permit application through permit conversion?

4.1.2. Are there any permits that should be voided upon issuance of this permit application through permit consolidation?

5) Who will electronically sign this Title V application?

6) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?

No

**Duly Authorized Representative** 

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 <a href=/ePermitsExternal/faces/file?

fileId=231663>BCO T5 O2207 Minor REV

Application\_12-2024.docx</a>

Hash 3022AF6D8C16A147EEDF1196F9AEB3EB7EEAB08A1FF0B3D5F038A6D67D55AAFC

MIME-Type application/vnd.openxmlformats-

officedocument.wordprocessingml.document

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

## Expedite Title V

#### 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 Gretchen B Abney, the owner of the STEERS account ER004717.
- 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 2207.
- 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: Gretchen B Abney OWNER OPERATOR

Account Number: ER004717
Signature IP Address: 208.87.234.202
Signature Date: 2024-12-26

 Signature Hash:
 577FE8D93F4D88C362B66EF2C36FF5A854619433768A9843209AC46B45DA019B

 Form Hash Code at time of Signature:
 B9E9B17520D16A3752F5805F403737F282FCF9E9AB880AEAB875F4EBA6B98CB7

#### Submission

Reference Number: The application reference number is 737242

Submitted by: The application was submitted by ER004717/Gretchen B Abney

Submitted Timestamp: The application was submitted on 2024-12-26

at 14:45:03 CST

Submitted From: The application was submitted from IP address

208.87.234.202

Confirmation Number: The confirmation number is 609607
Steers Version: The STEERS version is 6.84

Permit Number: The permit number is 2207

#### Additional Information

Application Creator: This account was created by Oakley Hayes



#### Blue Cube Operations LLC

604 Texas Hwy 332 Lake Jackson, TX 77566 www.Olin.com

December 26, 2024

**STEERS Submittal** 

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

RE: Blue Cube Operations LLC: CN604930784; RN108772245 Epoxy Products & FMTO, O2207 Site Operating Permit Minor Revision Application

#### **Dear APIRT Team Leader:**

The purpose of this submittal is to apply for a Title V Minor Revision in compliance with 30 TAC §122.219-221, for Federal Operating Permit No. O2207, Epoxy Products & FMTO.

The attachments to this submittal are as follows:

- OP-CRO1
- OP-2
- OP-SUMR
- OP-UA15
- OP-REQ1, page 87
- OP-REQ3

For future correspondence regarding this permit application, please contact me at 979-529-3365 or via email at OHayes@Olin.com.

Sincerely,

## Oakley Hayes

Oakley Hayes, Air Permit Manager Blue Cube Operations LLC

XC:	EPA Region VI Administrator (6PD-R)	R6AirPermitsTX@epa.gov
	TCEQ, Region XII Air Section Manager	R12apdmail@tceq.texas.gov
	Director of Environmental Health	jodiev@brazoria-county.com
EMAIL:	Gretchen Abney	gbabney@olin.com

## **Blue Cube Operations LLC**

## Permit O2207 Epoxy Products & FMTO

## **Site Operating Permit Minor Revision Application**

**December 26, 2024** 

## 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: RN108772245	
CN: CN604930784	
Account No.: BL-A044-R	
Permit No.: O2207	
Project No.: TBD	
Area Name: Epoxy Products & FMTO	
Company Name: Blue Cube Operations LLC	
II. Certification Type (Please mark appropria	tte box)
Responsible Official Representative	Duly Authorized Representative
III. Submittal Type (Please mark appropriate	box) (Only one response can be accepted per form)
SOP/TOP Initial Permit Application	Permit Revision, Renewal, or Reopening
GOP Initial Permit Application	Update to Permit Application
Other:	

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

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 info	rmation which is des	signated by TCEQ a	as information for refe	rence only.		
I, Gretchen Abney	certify that	I am the	DAR			
(Certifier Name printed or	· typed)		(RO or DAR)			
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:  Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).						
Time Period: From	tı	0				
(S	Start Date)		(End Date)			
Specific Dates: December 26, 2024	<u> </u>					
(Date 1)	(Date 2)	(Date 3)	(Date 4)			
(Date 5)		(Date 6)				
Signature: Authority Signature Date: 12/26/2024						
Title: Site Leveraged EH&S Leader -	<b>Environmental</b>					

## Federal Operating Permit Program Application for Permit Revision/Renewal Form OP-2-Table 1

Date: December 26, 2024	
Permit No.: <b>O2207</b>	
Regulated Entity No.: RN108772245	
Company Name: Blue Cube Operations LLC	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA?	⊠ YES □ NO
I. Application Type	
Indicate the type of application:	
Renewal	
Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
Significant Revision	
Revision Requesting Prior Approval	
Administrative Revision	
Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only	⊠ YES □ NO
For GOP Revisions Only	☐ YES ☐ NO

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

III.	Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)							
	all pollutants for which the site in the appropriate box[es].)	s a major source based of	on the site's potential to en	mit:				
⊠ VO	$\square$ NO <sub>X</sub>	$\sum$ SO <sub>2</sub>	$\bowtie$ PM <sub>10</sub>	⊠ CO	Pb	⊠ HAP		
Other:								
IV.	<b>Reference Only Requirements</b>	(For reference only)						
Has the	as the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)?							
V.	7. Delinquent Fees and Penalties							
	Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.							

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

Date: December 26, 2024

Permit No.: **O2207** 

Regulated Entity No.: RN108772245

Company Name: Blue Cube Operations LLC

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

			Unit/Group	Process		
Revision No.	Revision Code	New Unit	ID No.	Applicable Form	NSR Authorization	Description of Change and Provisional Terms and Conditions
1	MS-C	YES	B62E2FU1, B62E2LR3, B62E2ST101, B62E2ST102, B62E2ST195 B62E2SV157	OP-SUMR OP-UA15	177431	Blue Cube authorized the replacement of the T-157 Scrubber with Pollution Control Project 177431. The scrubber controls multiple sources in VOC service, The replacement of the T-157 Scrubber does not trigger a change in the regulatory applicability of the associated equipment.  For clarity and conciseness, Olin has determined that process vent applicability will best be represented at this downstream source, Unit ID B62E2SV157, rather than the individual sources. Please see the OP-UA15 for addition of 30 TAC Chapter 115 Vent Gas Control and 63 Subpart G Process Vent applicability  Please update the Preconstruction Authorization for these sources to include NSR 177431 based on the attached OP- SUMR.

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

Date: December 26, 2024

Permit No.: **O2207** 

Regulated Entity No.: RN108772245

Company Name: Blue Cube Operations LLC

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

			Unit/Group	Process		
Revision No.	Revision Code	New Unit	ID No.	Applicable Form	NSR Authorization	Description of Change and Provisional Terms and Conditions
2	MS-C	NO	OC3U3CT201	OP-REQ1	3434	Blue Cube authorized the replacement of an existing cooling tower damaged by a recent hurricane with an amendment to NSR 3434. The replacement of the tower did not revise the current regulatory applicability. The issuance date of NSR 3434 is being updated to 10/30/2024. Please see the attached OP-REQ1 section XII.H

# 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.
December 26, 2024	O2207	RN108772245

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	B62E2FU1	OP-UA12	EPOXY RESIN PROCESS AREA FUGITIVES		104092 177431 106.261/11/01/2003, 106.262/11/01/2003 [155547, 158982, 160380, 162999, 163049, 163536, 164,666, 165205, 166671, 167228, 167664, 168396, 168463, 169443, 170297, 171291, 171480, 172966, 173279 ]	
	1	B62E2LR3	OP-UA4	ORGANIC SOLVENT LOADING		104092, 177431 106.261/11/01/2003, 106.262/11/01/2003[173596]	
	1	B62E2ST101	OP-UA3	D-101 PHENOL STORAGE TANK D- 101		104092 177431	
	1	B62E2ST102	OP-UA3	D-102 ACETONE STORAGE TANK D-102		104092 177431	
	1	B62E2ST195	OP-UA3	D-195 MIBK RCRA TANK		104092 177431	
	1	B62E2SV157	OP-UA15	EPOXY 2 T-157 SCRUBBER		104092 177431	

## 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**

Date	Permit No.	Regulated Entity No.
<b>December 26, 2024</b>	O2207	RN108772245

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
B62E2SV157	R5121-01	NO	NO	DISTOPER				

## 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**

Date	Permit No.	Regulated Entity No.
<b>December 26, 2024</b>	O2207	RN108772245

Emission Point ID No.	SOP Index No.	Alternate Control Requirement	ACR ID No.	Control Device Type	Control Device ID No.
B62E2SV157	R5121-01	NONE		OTHER	B62SV157

## Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes Form OP-UA15 (Page 13)

## **Federal Operating Permit Program**

Table 6a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

## Subpart G: National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents

Date	Permit No.	Regulated Entity No.	
December 26, 2024	O2207	RN108772245	

Emission Point ID No.	SOP Index No.	Overlap	Group 1	Regulation	HAP Concentration	Flow Rate	Electing Control	NSPS TRE Index Value	MACT TRE Index Value	Plant Type
B62E2SV157	63G-01	NONE	NO		NCE	NCE	NOELECT		4+	

## Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes Form OP-UA15 (Page 14)

## **Federal Operating Permit Program**

Table 6b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

## Subpart G: National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.	
December 26, 2024	O2207	RN108772245	

Emission Point ID No.	SOP Index No.	<b>Control Device</b>	Control Device ID No.	Halogenated	TRE for Halogenated Vent Stream	Halogen Reduction Device	Installation Date	Performance Test
B62E2SV157	63G-01			NO				NO

## Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes Form OP-UA15 (Page 15)

## **Federal Operating Permit Program**

Table 6c: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

## Subpart G: National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
December 26, 2024	O2207	RN108772245

Emission Point ID No.	SOP Index No.	Alternate Monitoring Parameters (AMP)	AMP ID No.	Continuous Monitoring	Continuous Monitoring Alt ID No.	Bypass Lines	Flow Indicator
B62E2SV157	63G-01	NO NO					

## **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.
<b>December 26, 2024</b>	O2207	RN108772245

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.	<b>Issuance Date</b>	Authorization No.	Issuance Date	Authorization No.	Issuance Date
3434	10/31/2019 10/30/2024				

♦ 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.	<b>Issuance Date</b>	Permit No.	<b>Issuance Date</b>	Permit No.	<b>Issuance Date</b>

## Applicable Requirements Summary Form OP-REQ3 Federal Operating Permit Program

Table 1a: Additions

Date: December 26, 2024	Regulated Entity No.: RN108772245	Permit No.: O2207
Company Name: Blue Cube Operations LLC	Area Name: Epoxy Products & FMTO	

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	B62E2SV157	OP-UA15	R5121-01	VOC	30 TAC 115, Vent Gas Control	§115.121(a)(2), §115.122(a)(2), §115.122(a)(2)(B)
1	B62E2SV157	OP-UA15	63G-01	112(b) HAPs	40 CFR 63, Subpart G	§63.113(e), [G]§63.115(f)

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

Date: December 26, 2024	Regulated Entity No.: RN108772245	Permit No.: O2207		
Company Name: Blue Cube Operations LLC	Area Name: Epoxy Products & FMTO			

Revision No.	Unit/Group/ Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
1	B62E2SV157	R5121-01	VOC	[G]§115.125, §115.126(1), §115.126(1)(C), §115.126(2)	§115.126, §115.126(1), §115.126(1)(C), §115.126(2)	None
1	B62E2SV157	63G-01	112(b) HAPs	[G]§63.115(a), [G]63.115(b), [G]63.115(c), 63.115(d) [G]§63.115(d)(1), 63.115(d)(2), 63.115(d)(2)(i), [G]§63.115(d)(2)(ii), 63.115 (d)(2)(iii)-(iv), [G]§63.115(d)(2)(v), [G]63.115(d)(3), §63.115(e), 63.115(e)(1), [G]63.115(f)	§63.117(b), [G]§63.118(c), [G]§63.152(a)	\$63.115(e)(2), 63.117(b), [G]\$63.118(g), [G]\$63.118(h), [G]\$63.118(k), [G]\$63.151(b), \$63.151(e), [G]\$63.151(e)(1), \$63.151(e)(3), [G]\$63.151(j), [G]\$63.152(a), \$63.152(b), [G]\$63.152(b)(1), \$63.152(c)(1), \$63.152(c)(2), \$63.152(c)(2)(ii), [G]\$63.152(c)(2)(iii), \$63.152(c)(4)(ii), \$63.152(c)(4)(iii), \$63.152(c)(4)(iii)