

From: Hayes, Oakley B FPLJ <OHayes@olin.com>
Sent: Tuesday, January 20, 2026 8:45 AM
To: Mark Meyer
Subject: Re: SOP Minor Application - Blue Cube/Epoxy Products & FMTO (Project 37526, Permit O2207)

Thank you for all your work on this!

From: Mark Meyer <Mark.Meyer@tceq.texas.gov>
Sent: Tuesday, January 20, 2026 8:32 AM
To: Hayes, Oakley B FPLJ <OHayes@olin.com>
Subject: RE: SOP Minor Application - Blue Cube/Epoxy Products & FMTO (Project 37526, Permit O2207)

<< THIS EMAIL ORIGINATED FROM OUTSIDE OF OLIN >>

Good morning,

Excellent. Thank you. I will submit the project to QAQC and advise once it is approved.

Mark Meyer
Air Permits Division - Operating Permits
Texas Commission on Environmental Quality
512.239.0445
[How is our customer service? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

From: Hayes, Oakley B FPLJ <OHayes@olin.com>
Sent: Tuesday, January 20, 2026 8:11 AM
To: Mark Meyer <Mark.Meyer@tceq.texas.gov>
Subject: Re: SOP Minor Application - Blue Cube/Epoxy Products & FMTO (Project 37526, Permit O2207)

Good morning sir,

I have reviewed the WDP and do not have any comments

From: Hayes, Oakley B FPLJ <OHayes@olin.com>
Sent: Monday, January 19, 2026 8:14 AM
To: Mark Meyer <Mark.Meyer@tceq.texas.gov>
Subject: Re: SOP Minor Application - Blue Cube/Epoxy Products & FMTO (Project 37526, Permit O2207)

Thank you, sir! I will get on reviewing this and will provide any comments by the due date.

From: Mark Meyer <Mark.Meyer@tceq.texas.gov>
Sent: Thursday, January 15, 2026 4:15 PM
To: Hayes, Oakley B FPLJ <OHayes@olin.com>
Subject: RE: SOP Minor Application - Blue Cube/Epoxy Products & FMTO (Project 37526, Permit O2207)

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Good afternoon,

Attached, please find v2 of the WDP which should address the comments and updates provided on both 5/21/2025 and 10/8/2025. Please review and provide your approval and/or comments at your earliest opportunity, but please no later than Friday, January 23rd. This review should allow for a much more streamlined effort since the focus should be just on the comments and updates related to the "cancellation" of the planned changes associated with standard permit 177431.

Thank you for your patience and understanding on the delay in providing this updated WDP.

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

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

How is our customer service? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Hayes, Oakley B FPLJ <OHayes@olin.com>
Sent: Wednesday, October 8, 2025 10:07 AM
To: Mark Meyer <Mark.Meyer@tceq.texas.gov>
Subject: RE: SOP Minor Application - Blue Cube/Epoxy Products & FMTO (Project 37526, Permit O2207)

Thank you sir!

From: Mark Meyer <Mark.Meyer@tceq.texas.gov>
Sent: Wednesday, October 8, 2025 10:05 AM
To: Hayes, Oakley B FPLJ <OHayes@olin.com>
Subject: RE: SOP Minor Application - Blue Cube/Epoxy Products & FMTO (Project 37526, Permit O2207)

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Mr. Hayes,

I received the update this morning – thank you.

I will review, process as needed and advise should I have any questions.

Thank you again.

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

How is our customer service? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Mark Meyer
Sent: Thursday, October 2, 2025 10:37 AM
To: Hayes, Oakley B FPLJ <OHayes@olin.com>
Subject: RE: SOP Minor Application - Blue Cube/Epoxy Products & FMTO (Project 37526, Permit O2207)

Thank you for the quick response. Appreciated. Next week sounds great!

Please keep in mind that a new RO must be identified via the OP-CRO2, and new DARs via the OP-DEL. Both forms must be submitted via STEERS and are permit specific.

Good luck!

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

How is our customer service? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Hayes, Oakley B FPLJ <OHayes@olin.com>
Sent: Thursday, October 2, 2025 9:15 AM
To: Mark Meyer <Mark.Meyer@tceq.texas.gov>
Subject: RE: SOP Minor Application - Blue Cube/Epoxy Products & FMTO (Project 37526, Permit O2207)

Good morning sir,

I am working on the application now. I am targeting early next week for the submittal. We are having some leadership turnover here so the people that would normally sign the OP-CRO and submit in STEERS are no longer able to do so. I will just need to track down whoever they are putting in those roles and get them to sign!

From: Mark Meyer <Mark.Meyer@tceq.texas.gov>
Sent: Thursday, October 2, 2025 8:43 AM
To: Hayes, Oakley B FPLJ <OHayes@olin.com>
Subject: RE: SOP Minor Application - Blue Cube/Epoxy Products & FMTO (Project 37526, Permit O2207)

<< THIS EMAIL ORIGINATED FROM OUTSIDE OF OLIN >>

Mr. Hayes,

Do you have a target date for the submittal of the updated package?

Thank you, sir.

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

How is our customer service? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Mark Meyer
Sent: Wednesday, October 1, 2025 10:04 AM
To: Hayes, Oakley B FPLJ <OHayes@olin.com>
Subject: RE: SOP Minor Application - Blue Cube/Epoxy Products & FMTO (Project 37526, Permit O2207)

Good morning,

You are welcome. Sounds good.

Please remember that the updated package will need to also be sent to EPA and the Region.

Thank you.

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

How is our customer service? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Hayes, Oakley B FPLJ <OHayes@olin.com>
Sent: Wednesday, October 1, 2025 8:47 AM
To: Mark Meyer <Mark.Meyer@tceq.texas.gov>
Subject: RE: SOP Minor Application - Blue Cube/Epoxy Products & FMTO (Project 37526, Permit O2207)

Thank you, sir! I will get to work on the updated strikethrough package and will submit that via STEERS asap. The only thing that will be changing is I will be removing the reference to the standard permit that we were using to authorize the scrubber. We will be voiding that standard permit.

From: Mark Meyer <Mark.Meyer@tceq.texas.gov>
Sent: Tuesday, September 30, 2025 3:44 PM
To: Hayes, Oakley B FPLJ <OHayes@olin.com>
Subject: RE: SOP Minor Application - Blue Cube/Epoxy Products & FMTO (Project 37526, Permit O2207)

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Good afternoon,

I would suggest we have two methods to address the "changes":

1. "Re-submit" the entire package using the "strikethrough" feature to indicate all of the items that are no longer pertinent/related/applicable; or
2. Submit an entire new complete package which includes reference to only the desired changes that are to be made.
 - a. As part of this submittal, include a cover letter requesting the previous submittal (submitted/dated 12/26/2024) be "ignored/disregarded" and this newly submitted package replaces the previous submittal and be used exclusively for this minor revision project.

Please let me know if you have any question or would like to discuss via a phone conversation.

Thank you, sir.

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

How is our customer service? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Hayes, Oakley B FPLJ <OHayes@olin.com>
Sent: Monday, September 29, 2025 10:29 AM
To: Mark Meyer <Mark.Meyer@tceq.texas.gov>
Subject: RE: SOP Minor Application - Blue Cube/Epoxy Products & FMTO (Project 37526, Permit O2207)

Good morning sir,

I hope you enjoyed your weekend. I have a question for you regarding this application. The business has decided to cancel the replacement of the T-157 scrubber (B62E2SV157). That replacement was the majority of this submittal, but not everything. My question is, what do we need to do to revert back to our previous representation?

As always, your assistance is greatly appreciated!

From: Mark Meyer <Mark.Meyer@tceq.texas.gov>

Sent: Monday, June 2, 2025 5:33 PM

To: Hayes, Oakley B FPLJ <OHayes@olin.com>

Subject: RE: SOP Minor Application - Blue Cube/Epoxy Products & FMTO (Project 37526, Permit O2207)

<< THIS EMAIL ORIGINATED FROM OUTSIDE OF OLIN >>

Good afternoon,

Received – thank you.

I will proceed and advise on the CRO1 at the proper time.

Thank you.

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

How is our customer service? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Hayes, Oakley B FPLJ <OHayes@olin.com>

Sent: Wednesday, May 21, 2025 3:28 PM

To: Mark Meyer <Mark.Meyer@tceq.texas.gov>

Subject: RE: SOP Minor Application - Blue Cube/Epoxy Products & FMTO (Project 37526, Permit O2207)

Hello Mr. Meyer,

I reviewed the draft permit and did not have any comments or concerns.

Attached, please find the requested information. As we discussed, Blue Cube will wait until you request the final OP-CRO1 to submit one that covers the entire working period for this permit action. The attached OP-REQ1 page 89 includes the standard permit authorization 177431. For the periodic monitoring, Blue Cube is electing to monitor the liquid flow rate and gas flow rate. A minimum liquid-to-gas ratio has been established and is monitored, consistent with PM Option Number PM-V-039.

As always, if any more information is needed, or if there are any questions, please let me know. And if we don't talk before the holiday, enjoy the long weekend!

Thank you

From: Mark Meyer <Mark.Meyer@tceq.texas.gov>
Sent: Monday, May 12, 2025 9:30 AM
To: Hayes, Oakley B FPLJ <OHayes@olin.com>
Subject: RE: SOP Minor Application - Blue Cube/Epoxy Products & FMTO (Project 37526, Permit O2207)

<< THIS EMAIL ORIGINATED FROM OUTSIDE OF OLIN >>

Good morning,

Good deal. Thank you. Appreciated.

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

How is our customer service? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Hayes, Oakley B FPLJ <OHayes@olin.com>
Sent: Monday, May 12, 2025 9:28 AM
To: Mark Meyer <Mark.Meyer@tceq.texas.gov>
Subject: RE: SOP Minor Application - Blue Cube/Epoxy Products & FMTO (Project 37526, Permit O2207)

Good morning sir,

Received. I will get rolling on all of this and will let you know if I have any questions.

From: Mark Meyer <Mark.Meyer@tceq.texas.gov>
Sent: Sunday, May 11, 2025 6:30 PM
To: Hayes, Oakley B FPLJ <OHayes@olin.com>
Subject: RE: SOP Minor Application - Blue Cube/Epoxy Products & FMTO (Project 37526, Permit O2207)

<< THIS EMAIL ORIGINATED FROM OUTSIDE OF OLIN >>

Good evening,

I have completed the technical review of the minor revision application submitted for Blue Cube Operations LLC and the Epoxy Products & FMTO facility (Project 37526, Permit O2207).

Attached, please find the Working Draft Permit (WDP) for your review and approval, and/or comments. During the preparation of the WDP, the following items surfaced which require additional information:

1. Please be sure to either mail the hard-copy original of the OP-CRO1 submitted 2/10/2025 or submit the "package" provided via STEERS.
2. Please submit an updated OP-REQ1 page 89 to include the new Standard Permit authorization No. 177431, issued 10/15/2024.
3. Please submit an OP-MONM to indicate the applicable Periodic Monitoring for the new unit B62E2SV157, associated with 30 TAC Chapter 115, Vent Gas Controls, Index No. R5121-01, Main Standard § 115.122(a)(1), for Pollutant VOC. I would guess Periodic Monitoring should be submitted for both Indicators Liquid Inlet Temperature and also Liquid Flow Rate. I have included two "dummy tables" in the WDP (pages 303, 304) as space holders for convenience.

Please review and provide the requested items, and your approval and/or comments to the WDP at your earliest opportunity, but please no later than COB 5/23/2025.

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

Thank you.

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

How is our customer service? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Mark Meyer
Sent: Monday, February 24, 2025 7:55 AM
To: Hayes, Oakley B FPLJ <OHayes@olin.com>
Subject: RE: SOP Minor Application - Blue Cube/Epoxy Products & FMTO (Project 37526, Permit O2207)

Good morning,

Received – thank you! No worries at all. I appreciate the quick response.

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

How is our customer service? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Hayes, Oakley B FPLJ <OHayes@olin.com>
Sent: Monday, February 24, 2025 7:22 AM
To: Mark Meyer <Mark.Meyer@tceq.texas.gov>
Subject: RE: SOP Minor Application - Blue Cube/Epoxy Products & FMTO (Project 37526, Permit O2207)

Good morning sir,

Apologies! I am not sure what happened when I printed that the first time. Please find the re-printed page 21 attached. If there is anything else that you need, please let me know.

From: Mark Meyer <Mark.Meyer@tceq.texas.gov>
Sent: Saturday, February 22, 2025 11:52 AM
To: Hayes, Oakley B FPLJ <OHayes@olin.com>
Subject: RE: SOP Minor Application - Blue Cube/Epoxy Products & FMTO (Project 37526, Permit O2207)

<< THIS EMAIL ORIGINATED FROM OUTSIDE OF OLIN >>

Good afternoon,

Please note that page 21 of the submittal (Table 1a of the OP-REQ3) is “cut-off” and the entire table is not shown. Please resubmit page 21 so that the entire table is viewable.

You may provide only page 21 as the rest of the pages in the document are fine.

Thank you.

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

How is our customer service? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Mark Meyer
Sent: Monday, February 10, 2025 10:55 AM
To: Hayes, Oakley B FPLJ <OHayes@olin.com>
Subject: RE: SOP Minor Application - Blue Cube/Epoxy Products & FMTO (Project 37526, Permit O2207)

Good morning,

Received – thank you.

I will review and advise should I have any questions or need additional information.

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

How is our customer service? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Hayes, Oakley B FPLJ <OHayes@olin.com>
Sent: Monday, February 10, 2025 10:49 AM
To: Mark Meyer <Mark.Meyer@tceq.texas.gov>
Subject: RE: SOP Minor Application - Blue Cube/Epoxy Products & FMTO (Project 37526, Permit O2207)

Good morning sir,

I hope you enjoyed your weekend! Please find the requested information attached. If there is anything else that you need, please let me know.

From: Mark Meyer <Mark.Meyer@tceq.texas.gov>
Sent: Wednesday, February 5, 2025 4:17 PM
To: Hayes, Oakley B FPLJ <OHayes@olin.com>
Subject: RE: SOP Minor Application - Blue Cube/Epoxy Products & FMTO (Project 37526, Permit O2207)

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You are welcome and thank you.

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

How is our customer service? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Hayes, Oakley B FPLJ <OHayes@olin.com>
Sent: Wednesday, February 5, 2025 11:44 AM

To: Mark Meyer <Mark.Meyer@tceq.texas.gov>; Abney, Gretchen B FPLJ <GBAbney@olin.com>
Subject: RE: SOP Minor Application - Blue Cube/Epoxy Products & FMTO (Project 37526, Permit O2207)

Thank you, sir. I will get on this and get you a response asap!

From: Mark Meyer <Mark.Meyer@tceq.texas.gov>
Sent: Wednesday, February 5, 2025 6:23 AM
To: Hayes, Oakley B FPLJ <OHayes@olin.com>; Abney, Gretchen B FPLJ <GBAbney@olin.com>
Subject: RE: SOP Minor Application - Blue Cube/Epoxy Products & FMTO (Project 37526, Permit O2207)

<< THIS EMAIL ORIGINATED FROM OUTSIDE OF OLIN >>

Good morning,

Yes, the email and requests are still valid.

Thank you for checking.

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

How is our customer service? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Hayes, Oakley B FPLJ <OHayes@olin.com>
Sent: Monday, February 3, 2025 8:32 AM
To: Mark Meyer <Mark.Meyer@tceq.texas.gov>; Abney, Gretchen B FPLJ <GBAbney@olin.com>
Subject: RE: SOP Minor Application - Blue Cube/Epoxy Products & FMTO (Project 37526, Permit O2207)

Good morning Mr. Meyer,

I just wanted to double check with you and make sure that your request in the email below is still valid. I saw that you had tried to recall the message.

From: Mark Meyer <Mark.Meyer@tceq.texas.gov>
Sent: Saturday, February 1, 2025 4:24 PM
To: Abney, Gretchen B FPLJ <GBAbney@olin.com>
Cc: Hayes, Oakley B FPLJ <OHayes@olin.com>
Subject: SOP Minor Application - Blue Cube/Epoxy Products & FMTO (Project 37526, Permit O2207)

<< THIS EMAIL ORIGINATED FROM OUTSIDE OF OLIN >>

Good afternoon,

I have been assigned the minor revision application submitted for Blue Cube Operations LLC and the Epoxy Products & FMTO facility, operating under Site Operating Permit (SOP) O2207. The application was submitted via STEERS December 26, 2024. The application has been assigned Project No. 37526.

For your information and consideration, EPA has, on occasion, objected to Title V permits based one or more of the following:

- NSR permit and PBR monitoring sufficiency –please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient.
- Reference to confidential business information (CBI) in NSR permits and PBR submittals.
- 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.
- 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 provide any updates, please let me know and we can discuss further.

Please submit an updated OP-2 and OP-SUMR to correctly identify the revisions being requested with this application. Unit B62E2SV157 does not currently exist in the permit, so it will be a new unit and must be both indicated and addressed as such in this application. Also, each unit if undergoing a change with this application, must be listed individually and each change identified individually as a change. The submitted OP-SUMR is basically good except that each “row” must be its own Revision No., and not all identified as Revision No. 1.

While it does seem that only changes associated with the five units other than unit B62E2SV157, currently grouped as “Revision No. 1” are updates to the preconstruction authorizations, each unit still must be listed individually as its own Revision No.

The currently submitted OP-2 for Revision No. 2, for unit OC3U3CT201 appears to be fine. However, it does need to be added to the OP-SUMR.

Please do not hesitate to contact me at any time should you have any questions or concerns.

I look forward to working with you during the review process.

Thank you.

Mark Meyer
Air Permits Division - Operating Permits
Texas Commission on Environmental Quality
P.O. Box 13087, MC 163
Austin, TX 78711-3087
512.239.0445

mark.meyer@tceq.texas.gov

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



How is our customer service? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

Texas Commission on Environmental Quality

Title V Existing

2207

Site Information (Regulated Entity)

What is the name of the permit area to be authorized? EPOXY PRODUCTS & FMTO

Does the site have a physical address? Yes

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? Yes

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 (CN)? CN604930784

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

I certify that the full legal name of the entity applying for this permit has been provided and is legally authorized to do business in Texas. Yes

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 applicable) 604 HIGHWAY 332

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

City LAKE JACKSON

State TX

ZIP 77566

Phone (###-###-####) 9795293249

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 contact. MARGARITO CRUZ(BLUE CUBE OPERA...)

Organization Name BLUE CUBE OPERATIONS LLC

Prefix MR

First MARGARITO

Middle

Last CRUZ

Suffix JR

Credentials

Title SITE LEVERAGED EHS LEADER MULTI MEDIA

Enter new address or copy one from list

Mailing Address

Address Type Domestic

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

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

City LAKE JACKSON

State TX

Zip 77566

Phone (###-###-####) 9795293080

Extension

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

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

E-mail mcruz3@olin.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact. New Contact

Organization Name Blue Cube Operations LLC

Prefix MR

First Oakley

Middle

Last Hayes

Suffix

Credentials

Title Air Permit Writer

Enter new address or copy one from list:

Mailing Address

Address Type Domestic

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

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 Sec
- 3) Permit Longitude Coordinate: 95 Deg 21 Min 10 Sec
- 4) Is this submittal a new application or an update to an existing application? Update
- 4.1. Select the permit/project number for which this update should be applied. 2207-37526
- 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-ACPS (Application Compliance Plan and Schedule)

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

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

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

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name Updated_BCO T5 O2207 Minor REV Application_10-7-2025.pdf

Hash 58D0B53530E7445884391038FC29DCD7929B1FD245F2034B8FFE477F60A2F17A

MIME-Type application/pdf

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

Certification

I certify that I am the 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.

I am Margarito Cruz JR, the owner of the STEERS account ER060414.

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

I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.

I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.

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

I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.

I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.

I am knowingly and intentionally signing Title V Existing 2207.

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

OWNER OPERATOR Signature: Margarito Cruz JR OWNER OPERATOR

Account Number: ER060414

Signature IP Address: 163.116.253.41

Signature Date: 2025-10-08

Signature Hash:

AFC168B8C78CA39B5163778FF4C59C51538EA5F33D9332126D657EE1CC2D8D8B

Form Hash Code at time of Signature:

970024CBB3BD15A8125D0F45CC6FD90B6390CD0664260122354CC5227C456A3F

Submission

Reference Number: The application reference number is 824380

Submitted by: The application was submitted by ER060414/Margarito Cruz JR

Submitted Timestamp: The application was submitted on 2025-10-08 at 08:32:16 CDT

Submitted From: The application was submitted from IP address 163.116.253.41
Confirmation Number: The confirmation number is 683577
Steers Version: The STEERS version is 6.93
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

October 7, 2025

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 Mr. Meyer:

Blue Cube Operations LLC (Blue Cube) applied for a Title V Minor Revision in compliance with 30 TAC §122.219-221, for Federal Operating Permit No. O2207, Epoxy Products & FMTO on December 26, 2024. The application was assigned Project No. 37526. This package is an update to that project. Replacement of the T-157 scrubber has been cancelled. Blue Cube will void the Standard Permit that authorized the equipment replacement. That NSR authorization number will need to be removed from the Title V permit, as indicated in this submittal. Changes are indicated by strikethrough and blue text.

The attachments to this submittal are as follows:

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

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:	Lauren Proper	VLProper1@olin.com

Blue Cube Operations LLC

Permit O2207 Epoxy Products & FMTO

Site Operating Permit Minor Revision Application

October 7, 2025

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.: 37526	
Area Name: Epoxy Products & FMTO	
Company Name: Blue Cube Operations LLC	
II. Certification Type <i>(Please mark appropriate box)</i>	
<input checked="" type="checkbox"/> Responsible Official Representative	<input 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.
<p>I, <u>Matthew Stewart</u> certify that I am the <u>RO</u> <i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i></p> <p>and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete: <i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i></p>
<p>Time Period: From _____ to _____ <i>(Start Date)</i> <i>(End Date)</i></p>
<p>Specific Dates: <u>October 7, 2025</u> _____ <i>(Date 1)</i> <i>(Date 2)</i> <i>(Date 3)</i> <i>(Date 4)</i></p>
<p>_____ _____ <i>(Date 5)</i> <i>(Date 6)</i></p>
<p>Signature:  _____ Signature Date: <u>10/7/2025</u></p>
<p>Title: <u>Freeport Site Leader</u></p>

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

Date: October 7, 2025	
Permit No.: O2207	
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? <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 change in regulations.)						
Indicate all pollutants for which the site is a major source based on the site's potential to emit: <i>(Check the appropriate box[es].)</i>						
<input checked="" type="checkbox"/> VOC	<input checked="" type="checkbox"/> NO _x	<input checked="" type="checkbox"/> SO ₂	<input checked="" type="checkbox"/> PM ₁₀	<input checked="" type="checkbox"/> CO	<input type="checkbox"/> Pb	<input checked="" type="checkbox"/> HAP
Other:						
IV. Reference Only Requirements (For reference only)						
Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)?					<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 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: October 7, 2025
Permit No.: O2207
Regulated Entity No.: RN108772245
Company Name: Blue Cube Operations LLC

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

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
1	MS-C		B62E2FU1	OP-SUMR	177431 104092	<p>Blue Cube authorized the replacement of the T-157 Scrubber with Pollution Control Project 177431. That project is now being voided. The scrubber controls multiple sources in VOC service. This change the replacement of the T-157 Scrubber does not trigger a change in the regulatory applicability of the associated equipment.</p> <p>Please remove the reference to NSR 177431 update the Preconstruction Authorization for this source to include NSR 177431 based on the attached OP-SUMR.</p>

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

Date: October 7, 2025
Permit No.: O2207
Regulated Entity No.: RN108772245
Company Name: Blue Cube Operations LLC

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

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
2	MS-C		B62E2LR3	OP-SUMR	177431 104092	<p>Blue Cube authorized the replacement of the T-157 Scrubber with Pollution Control Project 177431. That project is now being voided. The scrubber controls multiple sources in VOC service. This change The replacement of the T-157 Scrubber does not trigger a change in the regulatory applicability of the associated equipment.</p> <p>Please remove the reference to NSR 177431 update the Preconstruction Authorization for this source to include NSR 177431 based on the attached OP-SUMR.</p>

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

Date: October 7, 2025
Permit No.: O2207
Regulated Entity No.: RN108772245
Company Name: Blue Cube Operations LLC

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

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
3	MS-C		B62E2ST101	OP-SUMR	177431 104092	<p>Blue Cube authorized the replacement of the T-157 Scrubber with Pollution Control Project 177431. That project is now being voided. The scrubber controls multiple sources in VOC service. This change The replacement of the T-157 Scrubber does not trigger a change in the regulatory applicability of the associated equipment.</p> <p>Please remove the reference to NSR 177431 update the Preconstruction Authorization for this source to include NSR 177431 based on the attached OP-SUMR.</p>

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

Date: October 7, 2025
Permit No.: O2207
Regulated Entity No.: RN108772245
Company Name: Blue Cube Operations LLC

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

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
4	MS-C		B62E2ST102	OP-SUMR	177431 104092	<p>Blue Cube authorized the replacement of the T-157 Scrubber with Pollution Control Project 177431. That project is now being voided. The scrubber controls multiple sources in VOC service. This change The replacement of the T-157 Scrubber does not trigger a change in the regulatory applicability of the associated equipment.</p> <p>Please remove the reference to NSR 177431 update the Preconstruction Authorization for this source to include NSR 177431 based on the attached OP-SUMR.</p>

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

Date: October 7, 2025
Permit No.: O2207
Regulated Entity No.: RN108772245
Company Name: Blue Cube Operations LLC

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

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
5	MS-C		B62E2ST195	OP-SUMR	177431 104092	<p>Blue Cube authorized the replacement of the T-157 Scrubber with Pollution Control Project 177431. That project is now being voided. The scrubber controls multiple sources in VOC service. This change The replacement of the T-157 Scrubber does not trigger a change in the regulatory applicability of the associated equipment.</p> <p>Please remove the reference to NSR 177431 update the Preconstruction Authorization for this source to include NSR 177431 based on the attached OP-SUMR.</p>

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

Date: October 7, 2025
Permit No.: O2207
Regulated Entity No.: RN108772245
Company Name: Blue Cube Operations LLC

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

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
6	MS-C	YES	<i>B62E2SV157</i>	OP-SUMR OP-UA15	177431 104092	<p>Blue Cube authorized the replacement of the T-157 Scrubber with Pollution Control Project 177431. That project is now being voided. The scrubber controls multiple sources in VOC service. This change The replacement of the T-157 Scrubber does not trigger a change in the regulatory applicability of the associated equipment.</p> <p>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</p> <p>Please remove the reference to NSR 177431 update the Preconstruction Authorization for this source to include NSR 177431 based on the attached OP-SUMR.</p>

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

Date: October 7, 2025
Permit No.: O2207
Regulated Entity No.: RN108772245
Company Name: Blue Cube Operations LLC

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

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
7	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 10/31/2024. 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.
October 7, 2025	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]	
	2	B62E2LR3	OP-UA4	ORGANIC SOLVENT LOADING		104092, 177431 106.261/11/01/2003, 106.262/11/01/2003[173596]	
	3	B62E2ST101	OP-UA3	D-101 PHENOL STORAGE TANK D-101		104092 177431	
	4	B62E2ST102	OP-UA3	D-102 ACETONE STORAGE TANK D-102		104092 177431	
	5	B62E2ST195	OP-UA3	D-195 MIBK RCRA TANK		104092 177431	
A	6	<i>B62E2SV157</i>	<i>OP-UA15</i>	<i>EPOXY 2 T-157 SCRUBBER</i>		<i>104092</i> <i>177431</i>	

**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.
October 7, 2025	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
	7	OC3U3CT201	OP-UA13	COOLING TOWER CT-201		3434	

**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.
October 7, 2025	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
<i>B62E2SV157</i>	<i>63G-01</i>	<i>NO</i>					

**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.
October 7, 2025	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.	Issuance Date	Authorization No.	Issuance Date	Authorization No.	Issuance Date
3434	10/31/2019 10/30/2024				
177431	10/15/2024				
104092	12/18/2023				

- ◆ **I. Permits by Rule (30 TAC Chapter 106) for the Application Area**

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

PBR No.	Version No./Date	PBR No.	Version No./Date	PBR No.	Version No./Date

- ◆ **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
Federal Operating Permit Program
Table 1a: Additions**

Date: October 7, 2025	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)
6	<i>B62E2SV157</i>	<i>OP-UA15</i>	<i>R5121-01</i>	<i>VOC</i>	<i>30 TAC 115, Vent Gas Control</i>	<i>§115.121(a)(2), §115.122(a)(2), §115.122(a)(2)(B)</i>
6	<i>B62E2SV157</i>	<i>OP-UA15</i>	<i>63G-01</i>	<i>112(b) HAPs</i>	<i>40 CFR 63, Subpart G</i>	<i>§63.113(e), [G]§63.115(f)</i>

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

Date: October 7, 2025	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
6	<i>B62E2SV157</i>	<i>R5121-01</i>	<i>VOC</i>	<i>[G]§115.125, §115.126(1), §115.126(1)(C), §115.126(2)</i>	<i>§115.126, §115.126(1), §115.126(1)(C), §115.126(2)</i>	<i>None</i>
6	<i>B62E2SV157</i>	<i>63G-01</i>	<i>112(b) HAPs</i>	<i>[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)</i>	<i>§63.117(b), [G]§63.118(c), [G]§63.152(a)</i>	<i>§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)(i), [G]§63.152(c)(2)(ii), §63.152(c)(2)(iii), §63.152(c)(4)(i), §63.152(c)(4)(ii), §63.152(c)(4)(iii)</i>

**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.: BL-A044-R	RN No.: RN108772245	CN: CN604930784
Permit No.: O2207	Project No.: 37526	
Area Name: Epoxy Products & FMTO		
Company Name: Blue Cube Operations LLC		
II. Unit/Emission Point/Group/Process Information		
Revision No.: N/A		
Unit/EPN/Group/Process ID No.: B62E2SV157		
Applicable Form: OP-UA15		
III. Applicable Regulatory Requirement		
Name: 30 TAC 115, Vent Gas Control		
SOP/GOP Index No.: R5121-01		
Pollutant: VOC		
Main Standard: 115.122(a)(1)		
IV. Title V Monitoring Information		
Monitoring Type: PM		
Unit Size:		
CAM/PM Option No.: PM-V-039		
Deviation Limit: Any monitoring data below the 66.0 L/G limit shall be considered and reported as a deviation.		
CAM/PM Option No.:		
Deviation Limit:		
V. Control Device Information		
Control Device ID No.: B62SV157		
Control Device Type: ABSOR2		

Texas Commission on Environmental Quality - Title V Existing - - 2207

Site Information (Regulated Entity)

What is the name of the permit area to be authorized? EPOXY PRODUCTS & FMTO

Does the site have a physical address? Yes

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? Yes

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 (CN)? CN604930784

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 applicable) 604 HIGHWAY 332

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

City LAKE JACKSON

State TX

ZIP 77566

Phone (###-###-####) 9795293249

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 contact. SONCIRAE LI(BLUE CUBE OPERA...)

Organization Name BLUE CUBE OPERATIONS LLC

Prefix MRS

First SONCIRAE

Middle

Last LI

Suffix

Credentials

Title EH&S DELIVERY LEADER

Enter new address or copy one from list

Mailing Address

Address Type Domestic

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

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

City LAKE JACKSON

State TX

Zip 77566

Phone (###-###-####) 9795293011

Extension

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

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

E-mail SMLi@olin.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact. New 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: Duly Authorized Representative Contact Address

Mailing Address

Address Type Domestic

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

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 Sec
- 3) Permit Longitude Coordinate: 95 Deg 21 Min 10 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? Administrative Action
- 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-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

[File Properties]

File Name OP_DEL_2025-04-02 Add Cruz as DAR remove Abney.pdf

Hash FD37F9E3403D22223071AE5155789B0A6E1FDD9DBA25E0B6069A29EEEF2BA9F6

MIME-Type application/pdf

Attach any other necessary information needed to complete the permit.

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

Expedite Title V

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

Certification

I certify that I am the 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.

I am Soncirae Li, the owner of the STEERS account ER020791.

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

I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.

I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.

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

I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.

I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.

I am knowingly and intentionally signing Title V Existing 2207.

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

OWNER OPERATOR Signature: Soncirae Li OWNER OPERATOR

Account Number: ER020791

Signature IP Address: 163.116.129.112

Signature Date: 2025-04-02

Signature Hash:

C95F66DABE9BEC06C2E726ED30BA7BB9BE07473E64E1CC3A62F941B30D2E5110

Form Hash Code at time of Signature:

56E472D6E283AC733F4DDD6C4994A2E29899FFDFB1B83AF4ED94095FD8E5293A

Submission

Reference Number: The application reference number is 775409

Submitted by: The application was submitted by ER020791/Soncirae Li

Submitted Timestamp: The application was submitted on 2025-04-02 at 13:15:28 CDT

Submitted From: The application was submitted from IP address 163.116.129.112

Confirmation Number: The confirmation number is 643664

Steers Version: The STEERS version is 6.89

Permit Number: The permit number is 2207

Additional Information

Application Creator: This account was created by Soncirae Li

Form OP-DEL
Delegation of Responsible Official Information
Federal Operating Permit Program
Texas Commission on Environmental Quality

I. Identifying Information
Account Number: BL-A044-R
Regulated Entity Number: RN 108772245
Customer Reference Number: CN 604930784
Permit Number: O1388
Area Name: GCO Freeport Operations
Company Name: Blue Cube Operations LLC (a wholly owned subsidiary of Olin Corporation)
II. Duly Authorized Representative Information
Action Type: <input checked="" type="checkbox"/> New DAR Identification <input type="checkbox"/> Administrative Information Change
Conventional Title: <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.
Name (Driver License/STEERS): Margarito Cruz Jr.
Title: Site Leveraged EHS Leader - Multi-Media
Delegation Effective Date: 04/02/2025
Telephone Number: 979-529-3080
Fax Number:
Company Name: Blue Cube Operations LLC
Mailing Address: 604 Texas Highway 332
City: Lake Jackson
State: Texas
ZIP Code: 77566
Email Address: mcruz3@olin.com

Form OP-DEL
Delegation of Responsible Official Information
Federal Operating Permit Program
Texas Commission on Environmental Quality

III. Certification of Truth, Accuracy, and Completeness

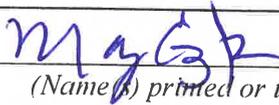
I, Matthew Stewart

(Name printed or typed: RO for New DAR Identification; RO or DAR for Administrative Information Change)

Certify that, based on information and belief formed after reasonable inquiry, the statements, and information stated above are true, accurate, and complete. *(RO signature required for New DAR Identification only; DAR signature required for any Action Type)*

Responsible Official Signature: 

Date: 4/2/25

Duly Authorized Representative Signature: 

(Name(s) printed or typed)

Date: 4/2/25

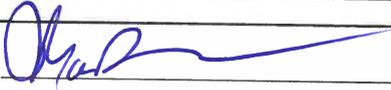
IV. Removal of Duly Authorized Representative(s)

The following should be removed as Duly Authorized Representative(s):

Gretchen Abney

(Name(s) printed or typed)

Effective Date: 4/2/25

Responsible Official Signature: 

Date: 04/02/2025

Form OP-DEL
Delegation of Responsible Official Information
Federal Operating Permit Program
(Extension)
Texas Commission on Environmental Quality

V. Additional Identifying Information	
Account Number:	BL-A044-R
Regulated Entity Number: RN	108772245
Customer Reference Number: CN	604930784
Permit Number:	O2202
Area Name:	Chlor-Alkali
Account Number:	BL-A044-R
Regulated Entity Number: RN	108772245
Customer Reference Number: CN	604930784
Permit Number:	O2204
Area Name:	EDC-VCM
Account Number:	BL-A044-R
Regulated Entity Number: RN	108772245
Customer Reference Number: CN	604930784
Permit Number:	O2207
Area Name:	Epoxy Products & FMTO
Account Number:	BL-A044-R
Responsible Official: RN	108772245
Customer Reference Number: CN	604930784
Permit Number:	O2208
Area Name:	Epoxy Intermediates
Account Number:	BL-A044-R
Regulated Entity Number: RN	108772245
Customer Reference Number: CN	604930784
Permit Number:	O2214
Area Name:	Power 3 & 6

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

Date: February 10, 2025	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)
6	<i>B62E2SV157</i>	<i>OP-UA15</i>	<i>R5121-01</i>	<i>VOC</i>	<i>30 TAC 115, Vent Gas Control</i>	<i>§115.121(a)(2), §115.122(a)(2), §115.122(a)(2)(B)</i>
6	<i>B62E2SV157</i>	<i>OP-UA15</i>	<i>63G-01</i>	<i>112(b) HAPs</i>	<i>40 CFR 63, Subpart G</i>	<i>§63.113(e), [G]§63.115(f)</i>



Blue Cube Operations LLC

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

February 10, 2025

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

February 10, 2025

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 <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 checked="" type="checkbox"/> Permit Revision, Renewal, or Reopening
<input type="checkbox"/> GOP Initial Permit Application	<input 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.
<p>I, <u>Gretchen Abney</u> certify that I am the <u>DAR</u> <i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i></p> <p>and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete: <i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i></p>
<p>Time Period: From _____ to _____ <i>(Start Date)</i> <i>(End Date)</i></p>
<p>Specific Dates: <u>February 10, 2025</u> _____ <i>(Date 1)</i> <i>(Date 2)</i> <i>(Date 3)</i> <i>(Date 4)</i></p> <p>_____ _____ <i>(Date 5)</i> <i>(Date 6)</i></p>
<p>Signature: <u></u> Signature Date: <u>2/10/2025</u></p>
<p>Title: <u>Site Leveraged EH&S Leader – Environmental</u></p>

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

Date: February 10, 2025	
Permit No.: O2207	
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? <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 change in regulations.)						
Indicate all pollutants for which the site is a major source based on the site's potential to emit: <i>(Check the appropriate box[es].)</i>						
<input checked="" type="checkbox"/> VOC	<input checked="" type="checkbox"/> NO _x	<input checked="" type="checkbox"/> SO ₂	<input checked="" type="checkbox"/> PM ₁₀	<input checked="" type="checkbox"/> CO	<input type="checkbox"/> Pb	<input checked="" type="checkbox"/> HAP
Other:						
IV. Reference Only Requirements (For reference only)						
Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)?					<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 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: February 10, 2025
Permit No.: O2207
Regulated Entity No.: RN108772245
Company Name: Blue Cube Operations LLC

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

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
1	MS-C		B62E2FU1	OP-SUMR	177431	<p>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.</p> <p>Please update the Preconstruction Authorization for this source to include NSR 177431 based on the attached OP-SUMR.</p>
2	MS-C		B62E2LR3	OP-SUMR	177431	<p>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.</p> <p>Please update the Preconstruction Authorization for this source to include NSR 177431 based on the attached OP-SUMR.</p>

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

Date: February 10, 2025
Permit No.: O2207
Regulated Entity No.: RN108772245
Company Name: Blue Cube Operations LLC

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

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
3	MS-C		B62E2ST101	OP-SUMR	177431	<p>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.</p> <p>Please update the Preconstruction Authorization for this source to include NSR 177431 based on the attached OP-SUMR.</p>
4	MS-C		B62E2ST102	OP-SUMR	177431	<p>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.</p> <p>Please update the Preconstruction Authorization for this source to include NSR 177431 based on the attached OP-SUMR.</p>

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

Date: February 10, 2025
Permit No.: O2207
Regulated Entity No.: RN108772245
Company Name: Blue Cube Operations LLC

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

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
5	MS-C		B62E2ST195	OP-SUMR	177431	<p>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.</p> <p>Please update the Preconstruction Authorization for this source to include NSR 177431 based on the attached OP-SUMR.</p>

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

Date: February 10, 2025
Permit No.: O2207
Regulated Entity No.: RN108772245
Company Name: Blue Cube Operations LLC

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

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
6	MS-C	YES	<i>B62E2SV157</i>	OP-SUMR OP-UA15	177431	<p>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.</p> <p>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</p> <p>Please update the Preconstruction Authorization for these sources to include NSR 177431 based on the attached OP-SUMR.</p>

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

Date: February 10, 2025
Permit No.: O2207
Regulated Entity No.: RN108772245
Company Name: Blue Cube Operations LLC

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

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
7	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 10/31/2024. 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.
February 10, 2025	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]	
	2	B62E2LR3	OP-UA4	ORGANIC SOLVENT LOADING		104092, 177431 106.261/11/01/2003, 106.262/11/01/2003[173596]	
	3	B62E2ST101	OP-UA3	D-101 PHENOL STORAGE TANK D-101		104092 177431	
	4	B62E2ST102	OP-UA3	D-102 ACETONE STORAGE TANK D-102		104092 177431	
	5	B62E2ST195	OP-UA3	D-195 MIBK RCRA TANK		104092 177431	
A	6	B62E2SV157	OP-UA15	EPOXY 2 T-157 SCRUBBER		104092 177431	

**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.
February 10, 2025	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
	7	OC3U3CT201	OP-UA13	COOLING TOWER CT-201		3434	

**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.
February 10, 2025	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.	Issuance Date	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.	Issuance Date	Permit No.	Issuance Date	Permit No.	Issuance Date

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

Date: February 10, 2025	Regulated Entity No.: RN108772245	Permit No.: O22
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
6	<i>B62E2SV157</i>	<i>OP-UA15</i>	<i>R5121-01</i>	<i>VOC</i>	<i>30 TAC 115, Vent Gas Control</i>
6	<i>B62E2SV157</i>	<i>OP-UA15</i>	<i>63G-01</i>	<i>112(b) HAPs</i>	<i>40 CFR 63, Subpart G</i>

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

Date: February 10, 2025	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
6	<i>B62E2SV157</i>	<i>R5121-01</i>	<i>VOC</i>	<i>[G]§115.125, §115.126(1), §115.126(1)(C), §115.126(2)</i>	<i>§115.126, §115.126(1), §115.126(1)(C), §115.126(2)</i>	<i>None</i>
6	<i>B62E2SV157</i>	<i>63G-01</i>	<i>112(b) HAPs</i>	<i>[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)</i>	<i>§63.117(b), [G]§63.118(c), [G]§63.152(a)</i>	<i>§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)(i), [G]§63.152(c)(2)(ii), §63.152(c)(2)(iii), §63.152(c)(4)(i), §63.152(c)(4)(ii), §63.152(c)(4)(iii)</i>



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

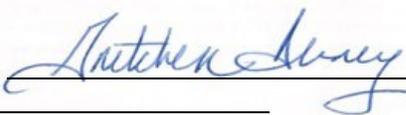
Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program
Texas Commission on Environmental Quality

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 <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 checked="" type="checkbox"/> Permit Revision, Renewal, or Reopening
<input type="checkbox"/> GOP Initial Permit Application	<input 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>Gretchen Abney</u> certify that I am the <u>DAR</u> <div style="display: flex; justify-content: space-between; width: 80%; margin: 0 auto;"> <i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i> </div>
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 _____ to _____ <div style="display: flex; justify-content: space-around; width: 80%; margin: 0 auto;"> <i>(Start Date)</i> <i>(End Date)</i> </div>
Specific Dates: <u>December 26, 2024</u> _____ <div style="display: flex; justify-content: space-around; width: 80%; margin: 0 auto;"> <i>(Date 1)</i> <i>(Date 2)</i> <i>(Date 3)</i> <i>(Date 4)</i> </div> <div style="display: flex; justify-content: space-around; width: 80%; margin: 0 auto; margin-top: 10px;"> <i>(Date 5)</i> <i>(Date 6)</i> </div>
Signature: <u></u> Signature Date: <u>12/26/2024</u>
Title: <u>Site Leveraged EH&S Leader – Environmental</u>

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

Date: December 26, 2024	
Permit No.: O2207	
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? <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 change in regulations.)

Indicate all pollutants for which the site is a major source based on the site's potential to emit:
 (Check the appropriate box[es].)

VOC NO_x SO₂ PM₁₀ CO Pb HAP

Other:

IV. Reference Only Requirements (For reference only)

Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)? YES NO N/A

V. 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.

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
1	MS-C	YES	B62E2FU1, B62E2LR3, B62E2ST101, B62E2ST102, B62E2ST195 <i>B62E2SV157</i>	OP-SUMR OP-UA15	177431	<p>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.</p> <p>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</p> <p>Please update the Preconstruction Authorization for these sources to include NSR 177431 based on the attached OP-SUMR.</p>

**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.

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
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	<i>B62E2SV157</i>	<i>OP-UA15</i>	<i>EPOXY 2 T-157 SCRUBBER</i>		<i>104092</i> <i>177431</i>	

**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
<i>B62E2SV157</i>	<i>63G-01</i>	<i>NO</i>					

**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.
December 26, 2024	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.	Issuance Date	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.	Issuance Date	Permit No.	Issuance Date	Permit No.	Issuance Date

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

**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	<i>B62E2SV157</i>	<i>R5121-01</i>	<i>VOC</i>	<i>[G]§115.125, §115.126(1), §115.126(1)(C), §115.126(2)</i>	<i>§115.126, §115.126(1), §115.126(1)(C), §115.126(2)</i>	<i>None</i>
1	<i>B62E2SV157</i>	<i>63G-01</i>	<i>112(b) HAPs</i>	<i>[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)</i>	<i>§63.117(b), [G]§63.118(c), [G]§63.152(a)</i>	<i>§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)(i), [G]§63.152(c)(2)(ii), §63.152(c)(2)(iii), §63.152(c)(4)(i), §63.152(c)(4)(ii), §63.152(c)(4)(iii)</i>