

From: Ryan Mayces <ryan.mayces@trinityconsultants.com>
Sent: Monday, October 20, 2025 4:23 PM
To: Kyle Murray
Cc: Bobbi Briggs
Subject: FW: Working Draft Permit -- FOP O2655/Project 37740 American Acryl, L.P. / American Acryl Bayport Complex
Attachments: OP-REQ1 (9_24)_Page 89.pdf; Major NSR Summary Table (9_22).xlsx

Follow Up Flag: Follow up
Flag Status: Flagged

Ryan Mayces
Principal Consultant

Phone: 281-513-1936
Email: ryan.mayces@trinityconsultants.com



Major NSR Summary Table

Permit Numbers: 37979 and N009				Issuance Date: October 16, 2025			
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rate		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hr	TPY (4)	Spec. Cond./ Appl. Info.	Spec. Cond./ Appl. Info.	Spec. Cond./ Appl. Info.
BOIL-Y1801	30-Barg Boiler	NOx	1.99	8.72	3, 21, 25, 27, 33, 42	3, 25, 27, 33, 42	3, 25, 27
		SO2	2.79	12.21			
		CO	13.93	30.51			
		PM	2.06	9.01			
		PM10	2.06	9.01			
		PM2.5	2.06	9.01			
		VOC	1.09	4.79			
		NH3	0.92	4.01			
	Boiler startup	NOx (8)	20.00	-			
		CO (8)	41.79	-			
CTWR-1701	Cooling Tower	PM	0.12	0.53	26	26	26
		PM10	0.12	0.53			
		PM2.5	0.12	0.53			
		VOC	1.26	5.52			
LOAD-FUG	Tank Truck Loading Losses	VOC	0.08	0.02	13, 14	13, 14	13, 14
		Organic HAPs	0.08	0.02			
OSBL-FUG	Fugitives (4)	VOC	0.73	3.20	3, 23, 24	3, 23, 24	3, 23, 24
		HAPs	0.49	2.12			
		NH3	0.01	0.06			
THOX-Y1907	OSBL Thermal Oxidizer	NOx	1.00	4.38	19, 25, 28, 33, 42	19, 25, 28, 33, 42	19, 25, 28
		SO2	3.46	15.16			
		CO	1.10	4.82			
		PM	1.23	5.39			
		PM10	1.23	5.39			
		PM2.5	1.23	5.39			
		VOC	5.96	0.62			

		Organic HAPs	1.73	0.11			
	OSBL Thermal Oxidizer Startup	NOx (8)	3.00	-			
		CO (8)	3.30	-			
FIRE-PUMPS	Firewater Pumps	NOx	23.25	2.56			
		CO	5.01	0.55			
		SO2	1.54	0.17			
		PM	1.65	0.18	5	5	5
		PM10	1.65	0.18			
		PM2.5	1.65	0.18			
		VOC	1.89	0.21			
DIESEL-TNK	Diesel Fuel Storage Tanks	VOC	0.02	<0.01	37	37	
GAS-TK	Gasoline Storage Tank	VOC	3.91	0.02	37	37	
DIESEL-TK2	Diesel Storage Tank	VOC	0.70	0.02	37	37	
LUBE-TK	Lube Oil Storage Tank	VOC	0.14	0.01	37	37	
TK-1703	Tank 1703	VOC	0.09	<0.01	37	37	
AA-FUG	AA Fugitives (4)	Total VOC (5)	2.14	9.37			
		Total HAPs	1.72	7.56			
		Hydrazine Hydrate	0.15	0.65	3, 23, 24	3, 23, 24	3, 23, 24
		NH3	0.01	0.01			
		CO	0.01	0.01			
THOX-Y1170 And SK-1186	AA Thermal Oxidizer & HRSG Stacks (6)	Total VOC (5)	5.90	23.02			
		Total HAPs	1.72	6.51			
		NOx	13.51	35.04			
		SO2	2.20	9.62			
		CO	8.85	32.28	19, 25, 28, 33	19, 25, 28, 29, 33	19, 25, 28
		PM	3.00	10.51			
		PM10	3.00	10.51			
		PM2.5	3.00	10.51			
		NH3	0.27	1.17			
	AA Thermal Oxidizer & HRSG Stacks Startup (6)	NOx (8)	40.53	-	33, 42	33, 42	33, 42
		CO (8)	47.61	-			
AA-MATL	Material Handling	PM	0.78	0.06			
		PM10	0.78	0.06			

		PM2.5	0.78	0.06			
DEGREASE-1	Degreaser	VOC	0.01	0.01			
WASH-PAD	Wash Pad	VOC	0.26	0.12			
		Organic HAPs	0.26	0.12			
AA-MNTC	Maintenance Activities	Total VOC	19.47	1.09	33, 34, 35, 36, 37, 38, 39, 40	33, 34, 35, 36, 37, 38, 39, 40	
		NOx	0.04	0.01			
		CO	0.04	0.01			

Footnotes:

- (1) Emission point identification - either specific equipment designation or emission point number (EPN) from plot plan.
- (2) Specific point source name. For fugitive sources use area name or fugitive source name.
- (3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1.
NH3 - ammonia
NOx - total oxides of nitrogen
SO2 - sulfur dioxide
PM - total particulate matter, suspended in the atmosphere, including PM10 and PM2.5
PM10 - particulate matter equal to or less than 10 microns in diameter, including PM2.5
PM2.5 - particulate matter equal to or less than 2.5 microns in diameter
CO - carbon monoxide
HAP - hazardous air pollutants
- (4) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.
- (5) The total VOC emissions include propylene and organic HAPs.
- (6) Emissions represent total combined emission rates from EPNs THOX-Y1170 and SK1186.
- (7) Compliance with annual emission limits (tons per year) is based on a 12-month rolling period.
- (8) Annual emissions from MSS activities (startup) are included in annual limits for the respective production EPNs.

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.
10/20/2025	O2655	RN101379287

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
37979	10/16/2025				

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

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

PBR No.	Version No./Date	PBR No.	Version No./Date	PBR No.	Version No./Date
106.261	11/01/2003				
106.262	11/01/2003				
106.433	09/04/2000				

- ◆ **J. Municipal Solid Waste and Industrial Hazardous Waste Permits with an Air Addendum**

Permit No.	Issuance Date	Permit No.	Issuance Date	Permit No.	Issuance Date

From: Kyle Murray <Kyle.Murray@tceq.texas.gov>

Sent: Thursday, October 9, 2025 2:22 PM

To: Ryan Mayces <ryan.mayces@trinityconsultants.com>

Cc: Bobbi Briggs <Bobbi.Briggs@americanacryl.com>

Subject: RE: Working Draft Permit -- FOP O2655/Project 37740 American Acryl, L.P. / American Acryl Bayport Complex

Good afternoon all,

I see that the pending amendment has been completed on 08/15/2025. There is an additional pending amendment for the same NSR authorization No. 37979. I am not sure we will have time to incorporate this further action as we need to move forward with the project timeline.

Please provide me with the updated Major NSR Summary Table (Word Document) as well as an updated page 89 of the OP-REQ1 (Section XII.H) for the issuance date of NSR Authorization No. 37979. Please provide a response by **Friday, October 17th** or sooner if possible. Thank you!

Sincerely,

Kyle J. Murray

Permit Reviewer

OA/Air Permits Division/OP Section
Texas Commission on Environmental Quality
MC 163, P.O. Box 13087
Austin, TX 78711-3087
kyle.murray@tceq.texas.gov

Phone: (512) 239-1279

Fax: (512) 239-1400



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

From: Ryan Mayces <ryan.mayces@trinityconsultants.com>

Sent: Friday, July 11, 2025 11:48 AM

To: Kyle Murray <Kyle.Murray@tceq.texas.gov>

Cc: Bobbi Briggs <Bobbi.Briggs@americanacryl.com>

Subject: RE: Working Draft Permit -- FOP 02655/Project 37740 American Acryl, L.P. / American Acryl Bayport Complex

Kyle,

Our response to your email dated June 19th are below.

Item 1 – The pending amendment will only impact the emission rate limits for AAFUG. However, the amendment should be issued soon and we would like to wait until issuance so that the NSR table is up to date.

Item 2 – There are no additional updates required until the MAERT is reissued.

Item 3 – Attached is a word version of the AMOC.

Ryan Mayces

Principal Consultant

Phone: 281-513-1936

Email: ryan.mayces@trinityconsultants.com



From: Kyle Murray <Kyle.Murray@tceq.texas.gov>

Sent: Thursday, June 19, 2025 10:01 AM

To: Bobbi Briggs <Bobbi.Briggs@americanacryl.com>

Subject: Working Draft Permit -- FOP O2655/Project 37740 American Acryl, L.P. / American Acryl Bayport Complex

Good morning Ms. Briggs,

I have conducted a technical review of the minor revision application for American Acryl, L.P. / American Acryl Bayport Complex. An electronic copy of the Working Draft Permit (WDP) is attached for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided. Please review the WDP and submit to me any comments you have on the working draft permit by **Friday, July 11th** or sooner if time allows. There are also some discrepancies that need to be addressed with your response to the WDP listed below.

1. **Form OP-REQ1 - Section XII.H – Authorization No. 37979** – This NSR Authorization has a pending Amendment action as of 11/18/2024. If this action will lead to changes/updates to the Major NSR Summary Table in the WDP and/or you would like to incorporate those updates into this revision, we may have to wait for the status to become completed before moving forward. Please let me know.
2. **Major NSR Summary Table** – Please review the NSR Major Summary Table in the WDP and make any necessary updates associated with the most recent renewal date of NSR Authorization 37979/N009 (10/31/2024). I have updated the Emission Rates on the Table according to the most recent MAERT, but please review this and the Special Conditions, making any updates in tracked changes mode so I can review them. Alternatively, please confirm there are no further updates needed if that is the case.
3. **Alternative Monitoring Requirements (AMOC)** – I was not able to include the AMOC approval letter in this copy of the WDP due to formatting issues. Please provide me with a Word copy of these documents (if possible) and I will add them to the WDP.

Let me know if you have any questions or comments about the items above and I would be happy to help.

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

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified application information, including application updates supporting the WDP comments, is required. After final review of the WDP, additional changes supported by application updates may require certification. I will advise you of these changes at a later date. Prior to transmittal of the Public Notice/Announcement Authorization Package, a duly signed

OP-CRO1 form may be required which includes the specific dates or time-period of all submitted application documentation that was not previously certified. I will advise you of this requirement prior to sending the Public Notice/Announcement Authorization.

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

Please notify me when these updates have been submitted.

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

Please let me know if you have any questions or comments and I would be happy to help. Thank you!

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

Sincerely,

Kyle J. Murray

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC 163, P.O. Box 13087

Austin, TX 78711-3087

kyle.murray@tceq.texas.gov

Phone: (512) 239-1279

Fax: (512) 239-1400



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

From: Kyle Murray
Sent: Wednesday, April 9, 2025 2:48 PM
To: bobbi.briggs@americanacryl.com
Subject: Technical Review -- FOP O2655/Project 37740, American Acryl, L.P. / American Acryl Bayport Complex

Good afternoon Ms. Briggs,

I have been assigned to the Federal Operating Permit (FOP) revision application of Permit No. O2655 for American Acryl, L.P., American Acryl Bayport Complex. This application has been assigned Project No. 37740. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

In addition, I wanted to let you know that EPA has, on occasion, objected to Title V permits based on the following:

- a. NSR permit and PBR monitoring sufficiency –please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient.
- b. Reference to confidential business information (CBI) in NSR permits and PBR submittals.
- c. High level terms in the SOP Applicable Requirement Summary Table. The high-level terms are sometimes used in SOPs when unit attribute forms have not yet been updated due to regulatory amendments.
- d. Accuracy of PBR information provided on the supplemental table and in the permit – please refer to Forms OP-PBRSUP and OP-REQ1 Instructions.

If you have any questions or concerns on any of these items or think you need to do any additional updates, let me know and we can discuss further.

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

Please notify me when these updates have been submitted.

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

Please review the “SOP Technical Review Fact Sheet” located at http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_facsheet.pdf. This guidance contains important information regarding the review process and

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

Thank you for your cooperation.

Sincerely,

Kyle J. Murray

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC 163, P.O. Box 13087

Austin, TX 78711-3087

kyle.murray@tceq.texas.gov

Phone: (512) 239-1279

Fax: (512) 239-1400



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Texas Commission on Environmental Quality

Title V Existing

2655

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	AMERICAN ACRYL BAYPORT COMPLEX
Does the site have a physical address?	Yes
Physical Address	
Number and Street	4631 OLD HIGHWAY 146
City	PASADENA
State	TX
ZIP	77507
County	HARRIS
Latitude (N) (##.#####)	29.600833
Longitude (W) (-###.#####)	95.019722
Primary SIC Code	2869
Secondary SIC Code	
Primary NAICS Code	325211
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN101379287
What is the name of the Regulated Entity (RE)?	AMERICAN ACRYL PASADENA
Does the RE site have a physical address?	No
Because there is no physical address, describe how to locate this site:	PLANT LOCATED AT THE SOUTHEAST CORNER OF PORT ROAD AND OLD HIGHWAY 146 IN THE BAYPORT INDUSTRIAL PARK IN THE CITY OF PASADENA TX
City	PASADENA
State	TX
ZIP	77507
County	HARRIS
Latitude (N) (##.#####)	29.601111
Longitude (W) (-###.#####)	-95.019444
Facility NAICS Code	
What is the primary business of this entity?	ORGANIC CHEMICALS

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN600731756
Type of Customer	Other
Full legal name of the applicant:	
Legal Name	American Acryl L.P.
Texas SOS Filing Number	10542011
Federal Tax ID	232943745

State Franchise Tax ID	12329437458
State Sales Tax ID	
Local Tax ID	
DUNS Number	17166575
Number of Employees	21-100
Independently Owned and Operated?	

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	AMERICAN ACRYL LP
Prefix	MR
First	FREDERICK
Middle	
Last	BROWN
Suffix	
Credentials	
Title	GENERAL MANAGER

Enter new address or copy one from list:

Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	4631 OLD HIGHWAY 146
Routing (such as Mail Code, Dept., or Attn:)	STE B
City	PASADENA
State	TX
ZIP	77507
Phone (###-###-####)	2819092611
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	2819092601
E-mail	rick.brown@americanacryl.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

Organization Name	BOBBI BRIGGS(AMERICAN ACRYL ...)
Prefix	AMERICAN ACRYL LP
First	MR
Middle	BOBBI
Last	BRIGGS
Suffix	
Credentials	
Title	ENVIRONMENTAL SPECIALIST

Enter new address or copy one from list:

Mailing Address	
Address Type	Domestic

Mailing Address (include Suite or Bldg. here, if applicable)	4631 OLD HIGHWAY 146
Routing (such as Mail Code, Dept., or Attn:)	STE B
City	PASADENA
State	TX
ZIP	77507
Phone (###-###-####)	2819092651
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	2819092601
E-mail	bobbi.briggs@americanacryl.com

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	29 Deg 36 Min 3 Sec
3) Permit Longitude Coordinate:	95 Deg 1 Min 11 Sec
4) Is this submittal a new application or an update to an existing application?	New Application
4.1. What type of permitting action are you applying for?	Streamlined Revision
4.1.1. Are there any permits that should be voided upon issuance of this permit application through permit conversion?	No
4.1.2. Are there any permits that should be voided upon issuance of this permit application through permit consolidation?	No
5) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

Attach OP-2 (Application for Permit Revision/Renewal)

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

FINAL Permit O2655 Minor Revision 2025-0305.pdf

Hash

271776751EB11613FF48700635720140585C106BEDC47F3CF6C344610F39B37D

MIME-Type

application/pdf

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

Expedite Title V

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

No

Certification

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

1. I am Frederick Brown IV, the owner of the STEERS account ER054968.
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 2655.
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: Frederick Brown IV OWNER OPERATOR

Account Number:

ER054968

Signature IP Address:

134.238.167.197

Signature Date:

2025-03-05

Signature Hash:

63C91F2C0FCE35E1D841F05449B360EEDB5156692C855382820876BD0B5A825D

Form Hash Code at time of Signature:

B58362F6C47514F5C7AA8361F246EEF2A64888D11C1988FA3D6C875CE2A0EDDA

Submission

Reference Number:

The application reference number is 745229

Submitted by:

The application was submitted by
ER054968/Frederick Brown IV

Submitted Timestamp:

The application was submitted on 2025-03-05
at 13:59:37 CST

Submitted From:

The application was submitted from IP address
134.238.167.197

Confirmation Number:

The confirmation number is 637152

Steers Version:

The STEERS version is 6.88

Permit Number:

The permit number is 2655

Additional Information

Application Creator: This account was created by Amber M Vice

March 5, 2025

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

Submitted via STEERS

Re: American Acryl, L.P.
SOP Number O2655 – Minor Revision Application
Bayport Complex
Pasadena, Harris County
Regulated Entity No. RN101379287
Customer Reference No. CN600731756

Attn APIRT:

This letter and attachments are being submitted pursuant to the requirements of §122.216 to revise the above-referenced permit for the American Acryl, L.P., Bayport Complex, located in Pasadena, Texas. There are no changes to the area map, plot plan, and process description and therefore that information is not included.

The relevant forms included in this minor revision are:

- Form OP-1 - Site Information Summary
- Form OP-2 - Application for Permit Revision/Renewal
- Form OP-REQ1 - Application Area-Wide Applicability Determinations & General Information

Please contact Ms. Bobbi Briggs at (281) 909-2651, if you have any questions or require any additional information concerning this submittal.

Sincerely,

Frederick Brown, IV
General Manager

FB/av

Attachments

cc: United States Environmental Protection Agency Region 6, R6AirPermitsTX@epa.gov
TCEQ Region 12, Air Permits Division, Houston, w/attachments
Director, Harris County Pollution Control Services, Pasadena,
w/attachments
Chief Health Inspector, Health Department – City of Pasadena, Pasadena,
w/attachments
Ms. Ryan S. Mayces, Trinity Consultants, Houston, w/attachments

SOP MINOR REVISION APPLICATION

Permit No. 02655

AMERICANACRYL

**American Acryl, L.P. (CN600731756)
American Acryl Bayport Complex (RN101379287)
Pasadena, Harris County, Texas**

Prepared By:

**Jennifer Arreola – Managing Consultant
Ryan S. Mayces – Principal Consultant**

TRINITY CONSULTANTS INC

Certificate of Registration No. F-5764

1800 W Loop S, Suite 1000
Houston, TX 77027

trinityconsultants.com

March 5, 2025

Project 244402.0068



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1. GENERAL AND ADMINISTRATIVE FORMS

- Form OP-1 - Site Information Summary
- Form OP-2 - Application for Permit Revision/Renewal

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 1)
Texas Commission on Environmental Quality**

Please print or type all information. Direct any questions regarding this application form to the Air Permits Division at (512) 239-1250 or to the Texas Commission on Environmental Quality, Office of Air, Air-Permits Division (MC 163), P.O. Box 13087, Austin, Texas 78711-3087.

I. Company Identifying Information
A. Company Name: American Acryl, L.P.
B. Customer Reference Number (CN): CN600731756
C. Submittal Date (mm/dd/yyyy): 03/05/2025
II. Site Information
A. Site Name: American Acryl Bayport Complex
B. Regulated Entity Reference Number (RN): RN101379287
C. Indicate affected state(s) required to review permit application: <i>(Check the appropriate box[es].)</i>
☐ AR ☐ CO ☐ KS ☐ LA ☐ NM ☐ OK ☒ N/A
D. 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>
☒ VOC ☒ NO _x ☐ SO ₂ ☐ PM ₁₀ ☐ CO ☐ Pb ☐ HAPS
Other:
E. Is the site a non-major source subject to the Federal Operating Permit Program? ☐ Yes ☒ No
F. Is the site within a local program area jurisdiction? ☒ Yes ☐ No
G. Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? ☐ Yes ☒ No
H. Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:
III. Permit Type
A. Type of Permit Requested: <i>(Select only one response)</i>
☒ Site Operating Permit (SOP) ☐ Temporary Operating Permit (TOP) ☐ General Operating Permit (GOP)

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 2)
Texas Commission on Environmental Quality**

IV. Initial Application Information <i>(Complete for Initial Issuance Applications Only.)</i>
A. Is this submittal an abbreviated or a full application? ☐ Abbreviated ☐ Full
B. If this is a full application, is the submittal a follow-up to an abbreviated application? ☐ Yes ☐ No
C. If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit? ☐ Yes ☐ No
D. Has an electronic copy of this application been submitted (or is being submitted) to EPA? (Refer to the form instructions for additional information.) ☐ Yes ☐ No
E. Has the required Public Involvement Plan been included with this application? ☐ Yes ☐ No
V. Confidential Information
A. Is confidential information submitted in conjunction with this application? ☐ Yes ☒ No
VI. Responsible Official (RO) Identifying Information
RO Name Prefix: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
RO Full Name: Frederick Brown, IV
RO Title: General Manager
Employer Name: American Acryl, L.P.
Mailing Address: 4631 Old Highway 146, Suite B
City: Pasadena
State: TX
ZIP Code: 77507
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (281) 909-2611
Fax No.: (281) 909-2601
Email: rick.brown@americanacryl.com

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 3)
Texas Commission on Environmental Quality**

VII. Technical Contact Identifying Information <i>(Complete if different from RO.)</i>
Technical Contact Name Prefix: (☐ Mr. ☐ Mrs. ☒ Ms. ☐ Dr.)
Technical Contact Full Name: Bobbi Briggs
Technical Contact Title: Environmental Specialist
Employer Name: American Acryl, L.P.
Mailing Address: 4631 Old Highway 146, Suite B
City: Pasadena
State: TX
ZIP Code: 77507
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (281) 909-2651
Fax No.: (281) 909-2601
Email: bobbi.briggs@americanacryl.com
VIII. Reference Only Requirements <i>(For reference only.)</i>
A. State Senator: Mayes Middleton
B. State Representative: Dennis Paul
C. Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? ☒ Yes ☐ No ☐ N/A
D. Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? ☒ Yes ☐ No
E. Indicate the alternate language(s) in which public notice is required: Spanish

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 4)
Texas Commission on Environmental Quality**

IX. Off-Site Permit Request <i>(Optional for applicants requesting to hold the FOP and records at an off-site location.)</i>
A. Office/Facility Name:
B. Physical Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
C. Physical Location:
D. Contact Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
Contact Full Name:
E. Telephone No.:
X. Application Area Information
A. Area Name: American Acryl, L.P.
B. Physical Address: 4631 Old Highway 146
City: Seabrook
State: TX
ZIP Code: 77586
C. Physical Location: 4631 Old Highway 146
D. Nearest City: Seabrook
E. State: TX
F. ZIP Code: 77586

**Federal Operating Permit Program
Site Information Summary
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Texas Commission on Environmental Quality**

X. Application Area Information (continued)
G. Latitude (nearest second): 29° 36' 3"
H. Longitude (nearest second): 95° 1' 11"
I. Are there any emission units that were not in compliance with the applicable requirements identified in the application at the time of application submittal? ☐ Yes ☒ No
J. Indicate the estimated number of emission units in the application area: 17
K. Are there any emission units in the application area subject to the Acid Rain Program? ☐ Yes ☒ No
L. Affected Source Plant Code (or ORIS/Facility Code):
XI. Public Notice (Complete this section for SOP Applications and Acid Rain Permit Applications only.)
A. Name of a public place to view application and draft permit: La Porte Branch Library
B. Physical Address: 600 S. Broadway
City: La Porte
ZIP Code: 77571
C. Contact Person (Someone who will answer questions from the public during the public notice period):
Contact Name Prefix: (☐ Mr. ☐ Mrs. ☒ Ms. ☐ Dr.):
Contact Person Full Name: Bobbi Briggs
Contact Mailing Address: 4631 Old Highway 146, Suite B
City: Pasadena
State: TX
ZIP Code: 77507
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (281) 909-2651

**Federal Operating Permit Program
Site Information Summary
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XII. Delinquent Fees and Penalties
Notice: This form will not be processed until all delinquent fees and/or penalties owed to TCEQ or the Office of Attorney General on behalf of TCEQ are paid in accordance with the "Delinquent Fee and Penalty Protocol."
Complete Sections XIII and XIV for Acid Rain Permit and CSAPR applications only. Please include a copy of the Certificate of Representation submitted to EPA.
XIII. Designated Representative (DR) Identifying Information
DR Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
DR Full Name:
DR Title:
Employer Name:
Mailing Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.:
Fax No.:
Email:

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 7)
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Complete Sections XIII and XIV for Acid Rain Permit and CSAPR applications only. Please include a copy of the Certificate of Representation submitted to EPA.

XIV. Alternate Designated Representative (ADR) Identifying Information

ADR Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)

ADR Full Name:

ADR Title:

Employer Name:

Mailing Address:

City:

State:

ZIP Code:

Territory:

Country:

Foreign Postal Code:

Internal Mail Code:

Telephone No.:

Fax No.:

Email:

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

Date: 03/05/2025	
Permit No.: O2655	
Regulated Entity No.: RN101379287	
Company Name: American Acryl, L.P.	
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.)

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: 03/05/2025
Permit No.: O2655
Regulated Entity No.: RN101379287
Company Name: American Acryl, L.P.

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	No	Various	OP-REQ1	37979	Updating NSR Permit No. 37979 issuance date.

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 3
Texas Commission on Environmental Quality**

Date: 03/05/2025	
Permit No.: O2655	
Regulated Entity No.: RN101379287	
Company Name: American Acryl, L.P.	
I. Significant Revision <i>(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)</i>	
A. Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322?	☐ YES ☐ NO
B. Indicate the alternate language(s) in which public notice is required:	
C. Will, there be a change in air pollutant emissions as a result of the significant revision?	☐ YES ☐ NO

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 3
Texas Commission on Environmental Quality**

Using the table below, indicate the air pollutant(s) that will be changing and include a brief description of the change in pollutant emissions for each pollutant:

Pollutant	Description of the Change in Pollutant Emissions

2. POTENTIALLY APPLICABLE REQUIREMENT INFORMATION

- Form OP-REQ1 - Application Area-Wide Applicability Determinations & General Information

Application Area-Wide Applicability Determinations and General Information**Form OP-REQ1 (Page 88)****Federal Operating Permit Program****Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
03/05/2025	O2655	RN101379287

For SOP applications, answer ALL questions unless otherwise directed.

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

XII. NSR Authorizations (Attach additional sheets if necessary for sections XII.E-J.)**E. PSD Permits and PSD Major Pollutants**

Permit No.	Issuance Date	Pollutant(s):	Permit No.	Issuance Date	Pollutant(s):

If PSD Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html.

F. Nonattainment (NA) Permits and NA Major Pollutants

Permit No.	Issuance Date	Pollutant(s):	Permit No.	Issuance Date	Pollutant(s):
N009	07/03/2000	NO _x , VOC			

If NA Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html.

G. NSR Authorizations with FCAA § 112(g) Requirements

NSR Permit No.	Issuance Date	NSR Permit No.	Issuance Date	NSR Permit No	Issuance Date

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.
03/05/2025	O2655	RN101379287

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
37979	10/31/2024				

- ◆ **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
106.261	11/01/2003				
106.262	11/01/2003				
106.433	09/04/2000				

- ◆ **J. Municipal Solid Waste and Industrial Hazardous Waste Permits with an Air Addendum**

Permit No.	Issuance Date	Permit No.	Issuance Date	Permit No.	Issuance Date