

From: Mark Meyer
Sent: Monday, November 17, 2025 9:44 AM
To: Stuart L. Keil, P.E.
Cc: 'John Richard Branom [JBR]'; 'Michael Mayo [MTMA]'; 'Stuart L. Keil, P.E.'
Subject: RE: Working Draft Permit - Topsoe, Inc. Minor Revision (Project 37785, Permit O1217)

Good morning,

You are welcome and thank you for the quick response. I will proceed.

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: Stuart L. Keil, P.E. <keil@flash.net>
Sent: Monday, November 17, 2025 9:05 AM
To: Mark Meyer <Mark.Meyer@tceq.texas.gov>
Cc: 'John Richard Branom [JBR]' <jbr@topsoe.com>; 'Michael Mayo [MTMA]' <MTMA@topsoe.com>; 'Stuart L. Keil, P.E.' <stuartlkeil@gmail.com>
Subject: Re: Working Draft Permit - Topsoe, Inc. Minor Revision (Project 37785, Permit O1217)

Mark, thanks for the opportunity to review the draft permit that incorporates the two revision requests identified as Projects 37785 and 38113. Topsoe accepts the draft permit.

Please proceed with the permit issuance and thanks for your help in these matters.

On 11/12/2025 3:07 PM, Mark Meyer wrote:

Good afternoon,

Please see the slightly revised Working Draft Permit (v1a) attached. This version also includes the March 19, 2025 issuance letter for AMOC No. 232, in addition to the "corrected" letter dated April 2, 2025.

Please use this version (1a) for your review.

I apologize for the inconvenience.

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: Wednesday, November 12, 2025 11:10 AM

To: Stuart L. Keil, P.E. [<keil@flash.net>](mailto:keil@flash.net)

Cc: John Richard Branom [JBR] [<jbr@topsoe.com>](mailto:jbr@topsoe.com); Michael Mayo [MTMA] [<MTMA@topsoe.com>](mailto:MTMA@topsoe.com); Stuart L. Keil, P.E. [<stuartlkeil@gmail.com>](mailto:stuartlkeil@gmail.com)

Subject: Working Draft Permit - Topsoe, Inc. Minor Revision (Project 37785, Permit O1217)

Good morning,

As the pending amendment to New Source Review (NSR) No. 9203 was issued 11/7/2025, I have now completed the technical review of the submitted minor revision application for SOP No. O1217 (Project 37785). Accordingly, attached is the Working Draft Permit (WDP) for your review and approval, and/or comments.

As a reminder, the minor revision project (38113) submitted 5/2/2025, was consolidated into Project 37785, and those related changes are indicated in this WDP.

Please review the WDP and provide your approval and/or comments at your earliest opportunity, but please no later than COB on Wednesday, 11/19/2025.

As always, 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: Thursday, July 31, 2025 4:04 PM
To: Stuart L. Keil, P.E.
Cc: John Richard Branom [JBR]; Michael Mayo [MTMA]; Stuart L. Keil, P.E.
Subject: RE: Consolidate Projects 37785 and 38113 for Topsoe, Inc. SOP O1217?

Mr. Keil,

You are welcome.

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: Stuart L. Keil, P.E. <keil@flash.net>
Sent: Thursday, July 31, 2025 4:00 PM
To: Mark Meyer <Mark.Meyer@tceq.texas.gov>
Cc: John Richard Branom [JBR] <jbr@topsoe.com>; Michael Mayo [MTMA] <MTMA@topsoe.com>; Stuart L. Keil, P.E. <stuartlkeil@gmail.com>
Subject: Re: Consolidate Projects 37785 and 38113 for Topsoe, Inc. SOP O1217?

Mark, thanks for your suggestion.

Please feel free to combine the two minor revisions.

Thanks.

On 7/31/2025 3:23 PM, Mark Meyer wrote:

Good afternoon,

A minor revision application (Project 37785) was submitted March 12, 2025 requesting the issuance date for NSR No. 9203 be updated in the Title V permit to reflect the new issuance date per the amendment (NSR Project No. 390144) submitted March 13, 2025 for NSR No. 9203 once issued.

A second minor revision application (Project 38113) was submitted May 2, 2023 requesting to incorporate the recent issued (March 19, 2025) revision of NSR AMOC No. 232 (NSR Project No.388573).

While the two projects can continue as separate actions, they could and should be consolidated into one project. Do you provide your approval for consolidating these two minor revision applications?

As the AMOC revision has been issued, we would still be awaiting the issuance of the amendment for NSR No. 9203 (Project 390144).

Other than providing your potential approval via response to this email, no further action would be required on your part.

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
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

From: Stuart L. Keil, P.E. <keil@flash.net>
Sent: Thursday, June 5, 2025 12:17 PM
To: Mark Meyer
Cc: 'John Richard Branom [JBR]'; Michael Mayo [MTMA]; 'Stuart Keil. P.E.'
Subject: Re: SOP Minor Revision Application for Topsoe, Inc./Topsoe Bayport Facility (Project 38113, Permit O1217)

Mark, thanks for your note.

We look forward to working with you on this project.

On 6/3/2025 5:22 PM, Mark Meyer wrote:

Good evening,

I have been assigned the submitted SOP minor revision application for Topsoe, Inc. and the Topsoe Bayport Facility (Permit O1217). The application has been assigned Project No. 38113 and was submitted via STEERS on May 2, 2025.

As I am sure you are aware, this SOP Minor Revision application will not be able to be processed until:

1. The pending renewal for SOP No. O1217 (Project 36880), submitted July 16, 2024, is issued;
2. The pending minor revision for SOP No. O1217 (Project 37785), submitted March 12, 2025, is issued; and
3. The pending amendment to NSR No. 9203 (Project 390144) is issued.

As a reminder, please note the EPA has, on occasion, objected to Title V permits based on the following:

1. NSR permit and PBR monitoring sufficiency – please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient;
2. Reference to confidential business information (CBI) in NSR permits and PBR submittals;
3. 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 developed or updated due to regulatory amendments; and
4. Accuracy of PBR information provided on the OP-PBRSUP 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 please let me know and we can discuss.

I will certainly contact you should I have any questions or require additional information during the review process. That said, please do not hesitate to contact me at any time should you have any questions.

As always, 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

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

From: Stuart L. Keil, P.E. <keil@flash.net>
Sent: Monday, March 31, 2025 8:19 AM
To: Mark Meyer
Cc: John Richard Branom [JBR]; 'Stuart Keil. P.E.'
Subject: Re: SOP Minor Revision Application for Topsoe, Inc. and the HTI Bayport Facility (Project 37785, Permit O1217)

Mark, that all sounds good. Thanks for the notice.

On 3/30/2025 6:13 PM, Mark Meyer wrote:

Good evening,

I have been assigned the submitted SOP minor revision application for Topsoe, Inc. and the HTI Bayport Facility (Permit O1217). The application has been assigned Project No. 37785 and was submitted via STEERS on 3/12/2025.

As I am sure you are aware, the SOP renewal application will not be able to be processed and go to public announcement until:

1. The pending amendment to NSR No. 9203 (Project 390144), submitted 3/13/2025, is issued; and
2. The pending SOP renewal application (Project 36880) is issued.

A quick review of the submittal seems to indicate the only requested change with this revision is updating the issuance date of NSR No. 9203, per the pending amendment (Project 390144) once it is issued.

In addition, please note the EPA has, on occasion, objected to Title V permits based on the following:

1. NSR permit and PBR monitoring sufficiency – please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient;
2. Reference to confidential business information (CBI) in NSR permits and PBR submittals;
3. 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 developed or updated due to regulatory amendments; and
4. Accuracy of PBR information provided on the OP-PBRSUP 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 please let me know and we can discuss.

I will certainly contact you should I have any questions or require additional information during the review process. That said, please do not hesitate to contact me at any time should you have any questions.

As always, 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

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**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: Topsoe, Inc.
B. Customer Reference Number (CN): CN 600132435
C. Submittal Date (mm/dd/yyyy): 05/02/2025
II. Site Information
A. Site Name: Topsoe Bayport
B. Regulated Entity Reference Number (RN): RN 101211498
C. Indicate affected state(s) required to review permit application: <i>(Check the appropriate box[es].)</i>
<input type="checkbox"/> AR <input type="checkbox"/> CO <input type="checkbox"/> KS <input type="checkbox"/> LA <input type="checkbox"/> NM <input type="checkbox"/> OK <input checked="" type="checkbox"/> 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>
<input type="checkbox"/> VOC <input checked="" type="checkbox"/> NO _x <input type="checkbox"/> SO ₂ <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> CO <input type="checkbox"/> Pb <input type="checkbox"/> HAPS
Other:
E. Is the site a non-major source subject to the Federal Operating Permit Program? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
F. Is the site within a local program area jurisdiction? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
G. Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? <input type="checkbox"/> YES <input checked="" type="checkbox"/> 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>
<input checked="" type="checkbox"/> Site Operating Permit (SOP) <input type="checkbox"/> Temporary Operating Permit (TOP) <input type="checkbox"/> 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? <input type="checkbox"/> Abbreviated <input type="checkbox"/> Full
B. If this is a full application, is the submittal a follow-up to an abbreviated application? <input type="checkbox"/> YES <input type="checkbox"/> NO
C. If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit? <input type="checkbox"/> YES <input type="checkbox"/> 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.) <input type="checkbox"/> YES <input type="checkbox"/> NO
E. Has the required Public Involvement Plan been included with this application? <input type="checkbox"/> YES <input type="checkbox"/> NO
V. Confidential Information
A. Is confidential information submitted in conjunction with this application? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
VI. Responsible Official (RO) Identifying Information
RO Name Prefix: (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
RO Full Name: Julio Holgado
RO Title: Plant Manager
Employer Name: Topsoe, Inc.
Mailing Address: 10010 Bayport Blvd.
City: Pasadena
State: TX
ZIP Code: 77507
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 281-228-5212
Fax No.: 281-228-5209
Email: JUL@topsoe.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: (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Technical Contact Full Name: John R. Branom
Technical Contact Title: Senior EHS Advisor
Employer Name: Topspe, Inc.
Mailing Address: 10010 Bayport Blvd.
City: Pasadena
State: TX
ZIP Code: 77507
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 281-228-5227
Fax No.: 281-228-5209
Email: JBR@topsoe.com
VIII. Reference Only Requirements <i>(For reference only.)</i>
A. State Senator: Mayes Middleton, District 11
B. State Representative: Dennis Paul, District 129
C. Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
D. Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? <input checked="" type="checkbox"/> YES <input type="checkbox"/> 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: (<input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Contact Full Name:
E. Telephone No.:
X. Application Area Information
A. Area Name: Topsoe Bayport
B. Physical Address: 10010 Bayport Road
City: Pasadena
State: TX
ZIP Code: 77507
C. Physical Location:
D. Nearest City: Pasadena
E. State: TX
F. ZIP Code: 77507

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 5)
Texas Commission on Environmental Quality**

X. Application Area Information (continued)
G. Latitude (nearest second): 29° 36' 38"
H. Longitude (nearest second): 95° 03' 33"
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? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
J. Indicate the estimated number of emission units in the application area: 52
K. Are there any emission units in the application area subject to the Acid Rain Program? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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: Pasadena Public Library
B. Physical Address: 1201 Jeff Ginn Memorial Drive
City: Pasadena
ZIP Code: 77506
C. Contact Person (Someone who will answer questions from the public during the public notice period):
Contact Name Prefix: (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.):
Contact Person Full Name: John R. Branom
Contact Mailing Address: 10010 Bayport Road
City: Pasadena
State: TX
ZIP Code: 77507
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 281-228-5227

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 6)
Texas Commission on Environmental Quality**

XII. 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 Attorney General on behalf of the 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: (<input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> 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)
Texas Commission on Environmental Quality**

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:

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

Date:	05/02/2025							
Permit No.:	O1217							
Regulated Entity No.:	101211498							
Company Name:	Topsoe, Inc.							
For Submissions to EPA								
Has a copy of this application been submitted (or is being submitted) to EPA?								■ YES □ 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 The referenced changes qualify for the marked revision type.								■ YES □ NO
For GOP Revisions Only The permitted area continues to qualify for a GOP.								□ YES □ NO
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 after the change is operated:								
Pollutant	VOC	NO_x	SO₂	PM₁₀	CO	Pb	HAPs	Other
Major at the site (YES/NO):	NO	YES	NO	NO	NO	NO	NO	
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 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.								

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

Date:	05/02/2025					
Permit No.:	O1217					
Regulated Entity No.:	101211498					
Company Name:	Topsoe, Inc.					
I. Description of Revision						
Revision No.	Revision Code	Unit/Group Process			NSR Authorization	Description of change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
1	MS-C	NO	H-9310	NA	9203	<p>New Source Review (NSR) Permit No. 9203 is being modified to incorporate a recently revised alternative method of compliance (AMOC) by NSR Project No. 390144. This AMOC was initially incorporated in the Title V permit on July 12, 2024 by Project No. 36074. The recently approved AMOC simply updates the previous AMOC based on stack test results.</p> <p>The affected source is the new TK3 Hot Water System Burner, Unit ID No. H-9310. This AMOC was needed because a single exhaust, the TK3 DeNOx Unit, includes one Rule 117 affected source, the hot water burner, and multiple non-Rule 117 sources. These sources pertain to the new TK3 catalyst manufacturing facilities that recently began operations.</p> <p>Accompanying this application is a copy of the revised AMOC approved on March 19, 2025, which needs to be incorporated in the Title V permit. Also, the permit issuance date will need to be updated in the Title V permit's New Source Review Authorization References Table after NSR Project No. 390144 is finalized.</p>
2	ADMIN-B	NO	NA	OP-1	NA	Topsoe requests that the Area Name and the Site Name for the permit be changed from "HTI Bayport" to "Topsoe Bayport." An updated Form OP-1 is being provided.
3	ADMIN-B	NO	NA	Core Data Form	NA	Topsoe requests that the Regulated Entity Name for the permit be changed from "Haldor Topsoe, Inc." to "Topsoe, Inc." An updated Core Data Form is being provided. The instructions for the form indicate that only the items that change need to be identified, which in this case is only the Regulated Entity Name.

TCEQ-10059 (v26, revised 10/200) OP-2

This form is for use by facilities subject to air quality permit requirements and may be revised periodically. (Title V release 03/10)



TCEQ Core Data Form

For detailed instructions on completing this form, please read the Core Data Form Instructions or call 512-239-5175.

SECTION I: General Information

1. Reason for Submission (If other is checked please describe in space provided.)		
<input type="checkbox"/> New Permit, Registration or Authorization (Core Data Form should be submitted with the program application.)		
<input type="checkbox"/> Renewal (Core Data Form should be submitted with the renewal form)		<input checked="" type="checkbox"/> Other
2. Customer Reference Number (if issued)	Follow this link to search for CN or RN numbers in Central Registry**	3. Regulated Entity Reference Number (if issued)
CN 600132435		RN 101211498

SECTION II: Customer Information

4. General Customer Information		5. Effective Date for Customer Information Updates (mm/dd/yyyy)			
<input type="checkbox"/> New Customer <input type="checkbox"/> Update to Customer Information <input type="checkbox"/> Change in Regulated Entity Ownership					
<input type="checkbox"/> Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts)					
<i>The Customer Name submitted here may be updated automatically based on what is current and active with the Texas Secretary of State (SOS) or Texas Comptroller of Public Accounts (CPA).</i>					
6. Customer Legal Name (If an individual, print last name first: eg: Doe, John)			If new Customer, enter previous Customer below:		
7. TX SOS/CPA Filing Number		8. TX State Tax ID (11 digits)		9. Federal Tax ID (9 digits)	
				10. DUNS Number (if applicable)	
11. Type of Customer:		<input type="checkbox"/> Corporation		<input type="checkbox"/> Individual	
Government: <input type="checkbox"/> City <input type="checkbox"/> County <input type="checkbox"/> Federal <input type="checkbox"/> Local <input type="checkbox"/> State <input type="checkbox"/> Other		<input type="checkbox"/> Sole Proprietorship		Partnership: <input type="checkbox"/> General <input type="checkbox"/> Limited	
12. Number of Employees		13. Independently Owned and Operated?			
<input type="checkbox"/> 0-20 <input type="checkbox"/> 21-100 <input type="checkbox"/> 101-250 <input type="checkbox"/> 251-500 <input type="checkbox"/> 501 and higher		<input type="checkbox"/> Yes <input type="checkbox"/> No			
14. Customer Role (Proposed or Actual) – as it relates to the Regulated Entity listed on this form. Please check one of the following					
<input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Owner & Operator <input type="checkbox"/> Other:					
<input type="checkbox"/> Occupational Licensee <input type="checkbox"/> Responsible Party <input type="checkbox"/> VCP/BSA Applicant					
15. Mailing Address:					
City State ZIP ZIP + 4					
16. Country Mailing Information (if outside USA)			17. E-Mail Address (if applicable)		
18. Telephone Number		19. Extension or Code		20. Fax Number (if applicable)	

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SECTION III: Regulated Entity Information

21. General Regulated Entity Information <i>(If 'New Regulated Entity' is selected, a new permit application is also required.)</i> <input type="checkbox"/> New Regulated Entity <input checked="" type="checkbox"/> Update to Regulated Entity Name <input type="checkbox"/> Update to Regulated Entity Information																								
<i>The Regulated Entity Name submitted may be updated, in order to meet TCEQ Core Data Standards (removal of organizational endings such as Inc, LP, or LLC).</i>																								
22. Regulated Entity Name <i>(Enter name of the site where the regulated action is taking place.)</i> Topsoe, Inc.																								
23. Street Address of the Regulated Entity: <i>(No PO Boxes)</i>		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%; height: 25px;"></td> <td style="width: 15%; height: 25px;"></td> <td style="width: 15%; height: 25px;"></td> <td style="width: 15%; height: 25px;"></td> <td style="width: 15%; height: 25px;"></td> <td style="width: 15%; height: 25px;"></td> <td style="width: 15%; height: 25px;"></td> <td style="width: 15%; height: 25px;"></td> </tr> <tr> <td style="text-align: center; font-size: small;">City</td> <td></td> <td style="text-align: center; font-size: small;">State</td> <td></td> <td style="text-align: center; font-size: small;">ZIP</td> <td></td> <td style="text-align: center; font-size: small;">ZIP + 4</td> <td></td> </tr> </table>															City		State		ZIP		ZIP + 4	
City		State		ZIP		ZIP + 4																		
24. County																								

If no Street Address is provided, fields 25-28 are required.

25. Description to Physical Location:																								
26. Nearest City				State		Nearest ZIP Code																		
<i>Latitude/Longitude are required and may be added/updated to meet TCEQ Core Data Standards. (Geocoding of the Physical Address may be used to supply coordinates where none have been provided or to gain accuracy).</i>																								
27. Latitude (N) In Decimal:						28. Longitude (W) In Decimal:																		
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds																			
29. Primary SIC Code (4 digits)		30. Secondary SIC Code (4 digits)		31. Primary NAICS Code (5 or 6 digits)		32. Secondary NAICS Code (5 or 6 digits)																		
33. What is the Primary Business of this entity? <i>(Do not repeat the SIC or NAICS description.)</i> 																								
34. Mailing Address:		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%; height: 25px;"></td> <td style="width: 15%; height: 25px;"></td> <td style="width: 15%; height: 25px;"></td> <td style="width: 15%; height: 25px;"></td> <td style="width: 15%; height: 25px;"></td> <td style="width: 15%; height: 25px;"></td> <td style="width: 15%; height: 25px;"></td> <td style="width: 15%; height: 25px;"></td> </tr> <tr> <td style="text-align: center; font-size: small;">City</td> <td></td> <td style="text-align: center; font-size: small;">State</td> <td></td> <td style="text-align: center; font-size: small;">ZIP</td> <td></td> <td style="text-align: center; font-size: small;">ZIP + 4</td> <td></td> </tr> </table>															City		State		ZIP		ZIP + 4	
City		State		ZIP		ZIP + 4																		
35. E-Mail Address:																								
36. Telephone Number			37. Extension or Code			38. Fax Number <i>(if applicable)</i>																		
() -						() -																		

39. TCEQ Programs and ID Numbers Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form. See the Core Data Form instructions for additional guidance.


<input type="checkbox"/> Dam Safety	<input type="checkbox"/> Districts	<input type="checkbox"/> Edwards Aquifer	<input type="checkbox"/> Emissions Inventory Air	<input type="checkbox"/> Industrial Hazardous Waste
<input type="checkbox"/> Municipal Solid Waste	<input type="checkbox"/> New Source Review Air	<input type="checkbox"/> OSSF	<input type="checkbox"/> Petroleum Storage Tank	<input type="checkbox"/> PWS
<input type="checkbox"/> Sludge	<input type="checkbox"/> Storm Water	<input type="checkbox"/> Title V Air	<input type="checkbox"/> Tires	<input type="checkbox"/> Used Oil
<input type="checkbox"/> Voluntary Cleanup	<input type="checkbox"/> Wastewater	<input type="checkbox"/> Wastewater Agriculture	<input type="checkbox"/> Water Rights	<input type="checkbox"/> Other:

SECTION IV: Preparer Information

40. Name:				41. Title:	
42. Telephone Number	43. Ext./Code	44. Fax Number	45. E-Mail Address		
() -		() -			

SECTION V: Authorized Signature

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 6 and/or as required for the updates to the ID numbers identified in field 39.

Company:	Topsoe, Inc.	Job Title:	Plant Manager	
Name (In Print):	Julio Charlemagne Holgado		Phone:	(281) 228 5212
Signature:			Date:	5/1/25

Brooke T. Paup, *Chairwoman*
Bobby Janecka, *Commissioner*
Catarina R. Gonzales, *Commissioner*
Kelly Keel, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 19, 2025

MR MICHAEL MAYO
SR MANAGER EHS
TOPSOE INC
10010 BAYPORT BLVD
PASADENA TX 77507-1412

Re: Alternative Method of Compliance (AMOC) No. 232
TK3 Catalyst Manufacturing Plant
Hot Water System §117 Alternative Compliance Demonstration
Regulated Entity Number: RN101211498
Customer Reference Number: CN600132435
Associated Permit Numbers: 9203 and O1217

Dear Mr. Mayo:

This correspondence is in response to Topsoe, Inc.'s (Topsoe's) January 30, 2025 follow-up to the February 21, 2024 Alternate Method of Compliance (AMOC) approval and required performance testing for the Hot Water System Heater in the TK3 Catalyst Manufacturing Plant. This AMOC provides an alternative compliance method for NO_x, CO, and NH₃ to comply with 30 TAC 117 Control of NO_x, Subchapter B Combustion control at major industrial, commercial, and institutional sources in ozone nonattainment areas, Division 3 Houston-Galveston-Brazoria Ozone Nonattainment Areas and Subchapter G, General Monitoring and Testing Requirements, Division 1 Compliance Stack Testing and Report Requirements as well as 30 TAC 101, Subchapter H Emissions Banking and Trading Program, Division 3 Mass Emissions Cap and Trade Program.

The performance testing report dated December 27, 2024 demonstrated initial compliance with NO_x, CO, and NH₃ state regulatory requirements applicable to the Hot Water Heater System (FIN HWSB-1).

The Texas Commission on Environmental Quality (TCEQ) Executive Director has made a decision to approve the compliance demonstration alternatives for NO_x, CO, and NH₃. Based on the results of the testing, the alternative methods to monitor on-going compliance of air contaminants are included in the attached AMOC Plan Conditions.

The AMOC approval may supersede certain requirements or representations in Permit Nos. 9203. To ensure effective and consistent enforceability, Topsoe is required to incorporate any completed and approved AMOC into the permit through submittal of an Alteration no later than 90 days after this action. This approval may also change applicable requirements for the site, which are identified in the site operating permit (SOP) O1217 and at that time, a submittal of a SOP Revision will be needed. Additionally, if approved, this AMOC is required to be attached to each annual MECT report.

March 19, 2025
Page 2
Mr. Michael Mayo

Re: Permit Number: 9203

If you need further information or have any questions, please contact Ms. Anne Inman, P.E. at (512) 239-1276 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

A handwritten signature in black ink, appearing to read 'Samuel Short', followed by a long horizontal line extending to the right.

Samuel Short, Deputy Director
Air Permits Division
Office of Air
Texas Commission on Environmental Quality

cc: Stuart Kiel, P.E., Primary , Keil Environmental Inc, Austin
Chief Health Inspector, Health Department, City of Pasadena, Pasadena
Director, Harris County, Pollution Control Services, Pasadena
Air Section Manager, Region 12 - Houston
Jesse E. Chacon, P.E., Manager, Operating Permits Section, Air Permits Division, OA: MC-163
Becky Tsuchiya, Manager, Chemical New Source Review Permits Section, Air Permits Division,
OA: MC-163

Project Number: 388573

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



Alternative Method of Control (AMOC) Plan, AMOC No.: AMOC232

Topsoe, Inc.

TK3 Catalyst Plant

Pasadena, Harris County

Regulated Entity Number: RN101211498

A. General Requirements

1. This AMOC Plan Authorization shall apply at the Topsoe, Inc., TK3 Catalyst Plant located in Pasadena, Harris County and identified by Regulated Entity Number RN101211498. Under Title 30 Texas Administrative Code (TAC) Section 117.325 (§ 117.325) this plan authorizes the alternate compliance demonstrations for the Hot Water Heater System.
2. A copy of the AMOC application, Test Report, and AMOC Plan provisions must be kept on-site or at a centralized location and made available at the request of personnel from the TCEQ or any pollution control agency with jurisdiction. The AMOC application is defined by the application initially received November 30, 2023, and supporting documentation submitted through January 31, 2025.
3. This authorization is granted under § 117.325 for emissions sources regulated by:
 - 30 TAC Chapter 117, Control of NO_x, Subchapter B Combustion Control at Major Industrial, Commercial, and Institutional Sources in Ozone Nonattainment Areas, Division 3 Houston-Galveston-Brazoria Ozone Nonattainment Areas;
 - 30 TAC Chapter 117, Control of NO_x, Subchapter G, General Monitoring and Testing Requirements, Division 1 Compliance Stack Testing and Report Requirements; and
 - 30 TAC Chapter 101 General Air Quality Rules, Subchapter H Emissions Banking and Trading, Division 3 Mass Emissions Cap and Trade Program.

This AMOC shall apply in lieu of the requirements in these state regulations, as applicable. Compliance with this AMOC is independent of Topsoe's obligation to comply with all other applicable requirements of 30 TAC Chapters 101 and 117, TCEQ permits, and applicable state and federal laws.

4. All representations submitted for this AMOC, as well as the provisions listed here, become conditions upon which this AMOC Plan is issued. It is unlawful to vary from the emission limits, control requirements, monitoring, testing, reporting or recordkeeping requirements of this Plan.

B. Specific Requirements

1. NO_x Performance Testing & MECT Annual Demonstration

- a. Following the procedures of NSR Permit No. 9203, Special Condition No. 21, an initial NO_x and O₂ performance test was performed with an alternative sample-port location of the Hot Water Heater exhaust prior to comingling with the other process streams or any control portion of the DeNO_x Unit on October 31-November 1, 2024. This testing was in addition to the DeNO_x exhaust stack testing required by NSR Permit No. 9203, Special Condition No. 21 [§§ 117.325(a) and 117.335(b)].
- b. The average measured NO_x concentration (ppmv) at this alternative sample location demonstrated that the Hot Water Heater uncontrolled exhaust concentration was 47.5 ppmvd @ 3% O₂ and is less than or equal to the NSR Permit No. 9203 Hot Water Heater burner representation of 70 ppmv (@ 3% O₂).

- c. The measured NOx concentration (ppmv) from the initial stack testing at the DeNOx outlet as required by NSR Permit No. 9203, Special Condition No. 21 and all associated operating parameters of the Hot Water Heater and DeNOx system are sufficient and demonstrate initial compliance [§ 117.355(b)].
- d. The heater's combustion settings determined during the initial tuning and performance testing shall be maintained at all times and any adjustments shall be documented. If any combustion parameter is adjusted greater than 10%, testing shall be repeated.
- e. The measured NOx outlet (47.5 ppmvd @ 3% O₂ or 0.0577 lb/MM Btu) shall be used in conjunction with actual annual fuel usage of the Hot Water Heater to meet the annual MECT allowance (0.3 tpy) [§§ 117.340(l)(2) and 117.340(a)]. A copy of the AMOC Approval and Plan shall be attached to each annual MECT report [§§ 101.352(b) and 101.354(b)(1)].

2. CO Performance Testing

- a. Following the procedures of NSR Permit No. 9203, Special Condition No. 21, an initial CO performance test was performed at an alternative sample-port location of the Hot Water Heater exhaust prior to comingling with the other process streams or any control portion of the DeNOx Unit. This testing was in addition to the CO testing at the exhaust of the DeNOx co-mingled exhaust stack as required by NSR Permit No. 9203, Special Condition No. 21 [§§ 117.325(a) and 117.335(b)].
- b. The measured CO concentration (ppmv) at the alternative sample location demonstrates that the Hot Water Heater uncontrolled exhaust concentration was 12.6 ppmvd @ 3% O₂ and is less than or equal to 400 ppmv corrected to 3% O₂ [§§ 117.335(b) and 117.310(c)(1)].
- c. The measured CO concentration (ppmv) from the initial stack testing at the DeNOx outlet as required by NSR Permit No. 9203, Special Condition No. 21 and all associated operating parameters of the Hot Water Heater and DeNOx system demonstrated initial compliance [§§ 117.335(b) and 117.310(c)(1)].
- d. On-going compliance requirements will be met by rechecking the CO concentrations when any DeNOx system exhaust NOx CEMS RATA are subsequently performed [§ 117.8120(2)(B)].

3. NH₃ Initial Performance Testing and Monitoring

- a. The NOx concentrations from the alternate location performance testing demonstrates compliance with § 117.310(c)(2) without reliance on any ammonia-based control system, therefore NH₃ monitoring under §117 is not required.

Texas Commission on Environmental Quality

Title V Existing

1217

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	HTI BAYPORT
Does the site have a physical address?	Yes
Physical Address	
Number and Street	10010 BAYPORT BLVD
City	PASADENA
State	TX
ZIP	77507
County	HARRIS
Latitude (N) (##.#####)	29.610555
Longitude (W) (-###.#####)	95.059166
Primary SIC Code	2819
Secondary SIC Code	
Primary NAICS Code	325188
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN101211498
What is the name of the Regulated Entity (RE)?	HALDOR TOPSOE
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	10010 BAYPORT BLVD
City	PASADENA
State	TX
ZIP	77507
County	HARRIS
Latitude (N) (##.#####)	29.610555
Longitude (W) (-###.#####)	-95.059166
Facility NAICS Code	
What is the primary business of this entity?	CATALYST MANUFACTURING

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN600132435
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Topsoe, Inc.
Texas SOS Filing Number	51721100
Federal Tax ID	131943844
State Franchise Tax ID	11319438443
State Sales Tax ID	

Local Tax ID	
DUNS Number	77874162
Number of Employees	101-250
Independently Owned and Operated?	

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	TOPSOE INC
Prefix	MR
First	JULIO
Middle	
Last	HOLGADO
Suffix	
Credentials	
Title	PLANT MANAGER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	10010 BAYPORT BLVD
Routing (such as Mail Code, Dept., or Attn:)	
City	PASADENA
State	TX
ZIP	77507
Phone (###-###-####)	2812285212
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	2812285209
E-mail	jul@topsoe.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.	JOHN BRANOM(TOPSOE INC...)
Organization Name	TOPSOE INC
Prefix	MR
First	JOHN
Middle	
Last	BRANOM
Suffix	
Credentials	
Title	SENIOR EHS ADVISOR
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	10010 BAYPORT BLVD

Routing (such as Mail Code, Dept., or Attn:)	
City	PASADENA
State	TX
ZIP	77507
Phone (###-###-####)	2812285227
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	2812285209
E-mail	jbr@topsoe.com

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	29 Deg 36 Min 38 Sec
3) Permit Longitude Coordinate:	95 Deg 3 Min 33 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)	
[File Properties]	
File Name	OP_1_Topsoe Form OP-1 050225.pdf
Hash	0C5286361827D913BEAFCE601BBBD88D3864529E2C239A14EC96F6957155CF24
MIME-Type	application/pdf
Attach OP-2 (Application for Permit Revision/Renewal)	
[File Properties]	
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Hash	E786A4046186B397D496AF7FF4C2FE2C8E2EF54B2DA452F9AF7C11EEB5A97BAC
MIME-Type	application/pdf
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	Topsoe Core Data Form 050125.pdf
Hash	09984D1E7AC7438B14C385B75A47342E69B3745F321AC8FF67A64ACE2A3CB759
MIME-Type	application/pdf

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

[File Properties]

File Name	TK3 AMOC 232 031925.pdf
Hash	508C4F80041117B88C00998C99AECC6ACA216B85FC9684664769B70E61421804
MIME-Type	application/pdf

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 Julio Holgado, the owner of the STEERS account ER097301.
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 1217.
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: Julio Holgado OWNER OPERATOR

Account Number:	ER097301
Signature IP Address:	155.190.8.4
Signature Date:	2025-05-02
Signature Hash:	1FCBC71CAE48F48761A31DFEFCF744BB4504D35613BC8AB8E7D01D4BC2DC50BF
Form Hash Code at time of Signature:	6B86778C97F3ADD2970855F02600823974ED02D165405DE88AA54BF8082D9CE0

Submission

Reference Number:	The application reference number is 777272
Submitted by:	The application was submitted by ER097301/Julio Holgado
Submitted Timestamp:	The application was submitted on 2025-05-02 at 13:06:55 CDT
Submitted From:	The application was submitted from IP address 155.190.8.4
Confirmation Number:	The confirmation number is 650642
Steers Version:	The STEERS version is 6.91
Permit Number:	The permit number is 1217

Additional Information

Application Creator: This account was created by Stuart L Keil

Texas Commission on Environmental Quality

Title V Existing

1217

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	HTI BAYPORT
Does the site have a physical address?	Yes
Physical Address	
Number and Street	10010 BAYPORT BLVD
City	PASADENA
State	TX
ZIP	77507
County	HARRIS
Latitude (N) (##.#####)	29.610555
Longitude (W) (-###.#####)	95.059166
Primary SIC Code	2819
Secondary SIC Code	
Primary NAICS Code	325188
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN101211498
What is the name of the Regulated Entity (RE)?	HALDOR TOPSOE
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	10010 BAYPORT BLVD
City	PASADENA
State	TX
ZIP	77507
County	HARRIS
Latitude (N) (##.#####)	29.610555
Longitude (W) (-###.#####)	-95.059166
Facility NAICS Code	
What is the primary business of this entity?	CATALYST MANUFACTURING

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN600132435
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Topsoe, Inc.
Texas SOS Filing Number	51721100
Federal Tax ID	131943844
State Franchise Tax ID	11319438443
State Sales Tax ID	

Local Tax ID	
DUNS Number	77874162
Number of Employees	101-250
Independently Owned and Operated?	

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	TOPSOE INC
Prefix	MR
First	JULIO
Middle	
Last	HOLGADO
Suffix	
Credentials	
Title	PLANT MANAGER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	10010 BAYPORT BLVD
Routing (such as Mail Code, Dept., or Attn:)	
City	PASADENA
State	TX
ZIP	77507
Phone (###-###-####)	2812285212
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	2812285209
E-mail	jul@topsoe.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.	JOHN BRANOM(TOPSOE INC...)
Organization Name	TOPSOE INC
Prefix	MR
First	JOHN
Middle	
Last	BRANOM
Suffix	
Credentials	
Title	SENIOR EHS ADVISOR
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	10010 BAYPORT BLVD

Routing (such as Mail Code, Dept., or Attn:)	
City	PASADENA
State	TX
ZIP	77507
Phone (###-###-####)	2812285227
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	2812285209
E-mail	jbr@topsoe.com

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	29 Deg 36 Min 38 Sec
3) Permit Longitude Coordinate:	95 Deg 3 Min 33 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)

[File Properties]

File Name

OP_2_Topsoe Form OP-2 030725.pdf

Hash

CC231ACD9A79BB1528D040A511ABF79768DD2ABFDBC062C4DDBA39C4F45E6584

MIME-Type

application/pdf

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-PBR SUP (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.

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 Julio Holgado, the owner of the STEERS account ER097301.
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 1217.
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: Julio Holgado OWNER OPERATOR

Account Number: ER097301

Signature IP Address: 155.190.8.6

Signature Date: 2025-03-12

Signature Hash: 1FCBC71CAE48F48761A31DFEFCF744BB4504D35613BC8AB8E7D01D4BC2DC50BF

Form Hash Code at time of Signature: 2C496F76F7A5CE2F703E5F86EF9DDC62DA73FE03A9496C4104A9AD0870A7AA18

Submission

Reference Number:

The application reference number is 768206

Submitted by:

The application was submitted by
ER097301/Julio Holgado

Submitted Timestamp:

The application was submitted on 2025-03-12 at 15:23:14 CDT

Submitted From:

The application was submitted from IP address 155.190.8.6

Confirmation Number:

The confirmation number is 638711

Steers Version:

The STEERS version is 6.88

Permit Number:

The permit number is 1217

Additional Information

Application Creator: This account was created by Stuart L Keil

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

Date:	03/12/2025							
Permit No.:	O1217							
Regulated Entity No.:	101211498							
Company Name:	Topsoe, Inc.							
For Submissions to EPA								
Has a copy of this application been submitted (or is being submitted) to EPA?								■ YES □ 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 The referenced changes qualify for the marked revision type.								■ YES □ NO
For GOP Revisions Only The permitted area continues to qualify for a GOP.								□ YES □ NO
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 after the change is operated:								
Pollutant	VOC	NO_x	SO₂	PM₁₀	CO	Pb	HAPs	Other
Major at the site (YES/NO):	NO	YES	NO	NO	NO	NO	NO	
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 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.								

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

Date:	03/12/2025					
Permit No.:	O1217					
Regulated Entity No.:	101211498					
Company Name:	Topsoe, Inc.					
I. Description of Revision						
Revision No.	Revision Code	Unit/Group Process			NSR Authorization	Description of change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
1	MS-A	NO	PRE-ST-28, ST-29	NA	9203	<p>New Source Review (NSR) Permit No. 9203 is being amended to authorize increased PM emissions from the TK3 DeNOx Unit, a smaller TK3 cooling tower than previously represented, and slight changes in several TK3 Plant stack parameters and locations.</p> <p>These proposed changes do not affect any of the permitted facilities' unique attributes or require any other changes to the Title V permit's requirements.</p> <p>The only permit revision needed is that the amended NSR permit's issuance date should be updated in the Title V permit's New Source Review Authorization References Table.</p>