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March 11, 2025

Texas Commission on Environmental Quality
Air Permits Initial Review Team (APIRT), MC 161
12100 Park 35 Circle
Building C, Third Floor
Austin, TX 78753

*RE: Application for Minor Revision
Title V Permit O1636
Arkema, Inc.
Beaumont Facility Chemical Manufacturing
CN600124044/RN100216373*

Dear APIRT:

On behalf of Arkema, Inc., Trinity Consultants is hereby submitting this application for a minor revision of Site Operating Permit No. O1636 for the Beaumont Facility Chemical Manufacturing in Jefferson County, TX.

If you have any questions or require additional information, please feel free to contact me at 737-284-0687 or heriberto.quintanilla@trinityconsultants.com.

Sincerely,

TRINITY CONSULTANTS

Heriberto "Eddie" Quintanilla, P.E.
Staff Consultant

Attachments

cc: Mr. Nicholas Ferraco, Plant Manager, Arkema, Inc., Beaumont, TX (email)
Ms. Sarah Kirksey, Air Section Manager, TCEQ Region 10, Beaumont, TX
EPA, Region 6. (R6AirPermitsTX@epa.gov)

HEADQUARTERS

12700 Park Central Dr, Ste 2100, Dallas, TX 75251 / P 800.229.6655 / P 972.661.8100 / F 972.385.9203

MINOR REVISION APPLICATION

Site Operating Permit 01636

Arkema, Inc. /
Beaumont Facility Chemical Manufacturing
CN600124044
RN100216373

Prepared By:

Heriberto Quintanilla, P.E. – Consultant

TRINITY CONSULTANTS

9737 Great Hills Trail
Suite 340
Austin, TX 78759

March 2025



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1. PROJECT INFORMATION

Arkema, Inc. (Arkema) owns and operates the Beaumont Facility Chemical Manufacturing in Jefferson County, Texas. Facilities at the site are operated under Site Operating Permit (SOP) O1636. The purpose of this application is to revise the SOP.

As part of this minor revision application, the following revisions are being requested:

- ▶ Incorporate the new dimethyl sulfide (DMDS) line and storage tank, which are authorized by NSR permit 865A/PSDTX1016M1.
- ▶ Add the new DMDS units with their applicable requirements, as detailed in the OP-SUMR and OP-UA forms.
- ▶ The Major NSR Summary Table is being updated to reflect the latest amendment to the NSR Permit No. 865A/PSDTX1016M1. Amendment/Renewal NSR project no. 387396 is still pending and isn't expected to be issued prior to submittal of the renewal application. Therefore, this amendment/renewal project is not incorporated at this time. The Major NSR Summary Table has been included at the end of this application and it's changes reflected using the "track changes" feature. A Word document is available upon request.

2. ADMINISTRATIVE FORMS

This section contains the following forms and information:

- ▶ OP-2 – Application for Permit Revision/Renewal
- ▶ OP-SUMR – Individual Unit Summary for Revisions

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

Date:	03/11/2025														
Permit No.:	O1636														
Regulated Entity No.:	RN100216373														
Company Name:	Arkema Inc.														
For Submissions to EPA															
Has an electronic copy of this application been submitted (or is being submitted) to EPA?										X	YES		NO		
I. Application Type															
Indicate the type of application:															
	Renewal														
X	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										X	YES		NO		
For GOP Revisions Only											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:															
<i>(Check the appropriate box[es].)</i>															
	VOC		NO _x	X	SO ₂		PM ₁₀	X	CO		Pb		HAPs		
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)?										X	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:	03/11/2025
Permit No.:	01636
Regulated Entity No.:	RN100216373
Company Name:	Arkema Inc.

Using the table below, provide a description of the 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	N/A	N/A	OP-REQ1	865A, PSDTX1016M1	Incorporate the new dimethyl sulfide (DMDS) line and storage tank, which are authorized by NSR permit 865A/PSDTX1016M1
2	MS-C	Yes	DMDS-TK, DMDS-LOADR, DMDS-LOADT, DMDS-LOADI, DMDS-CT, DMDS-FUG, X-7489	Various	865A, PSDTX1016M1	Add the new DMDS units with their applicable requirements, as detailed in the OP-SUMR and OP-UA forms.

Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR
Table 1

Date	Permit No.	Regulated Entity No.
03/11/2025	01636	RN100216373

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/30 TAC Chapter 106	Preconstruction Authorizations Title I
A	2	DMDS-TK	OP-UA03	DMDS Storage Tank		865A	PSDTX1016M1
A	2	DMDS-LOADR	OP-UA04	DMDS Railcar Loading		865A	PSDTX1016M1
A	2	DMDS-LOADT	OP-UA04	DMDS Truck Loading		865A	PSDTX1016M1
A	2	DMDS-LOADI	OP-UA04	DMDS Isocontainer loading		865A	PSDTX1016M1
A	2	DMDS-CT	OP-REQ2	DMDS Cooling Tower		865A	PSDTX1016M1
A	2	DMDS-FUG	OP-REQ2	DMDS Fugitives		865A	PSDTX1016M1
A	2	X-7489	OP-UA06	DMDS Boiler		865A	PSDTX1016M1

Texas Commission on Environmental Quality
Federal Operating Program
Individual Unit Summary for Revisions
Form OP-SUMR
Table 2

Date	Permit No.	Regulated Entity No.
03/11/2025	01636	RN100216373

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.
2	DMDS-LOADR	OP-UA04	A	GRP-DMDS-LOAD
2	DMDS-LOADT	OP-UA04	A	GRP-DMDS-LOAD
2	DMDS-LOADI	OP-UA04	A	GRP-DMDS-LOAD

3. UNIT ATTRIBUTE FORMS

This section contains the following Unit Attribute Forms:

- ▶ OP-UA03 – Storage Tank Vessel Attributes
- ▶ OP-UA04 – Loading/Unloading Operations Attributes
- ▶ OP-UA06 – Boiler/Steam Generator/Steam Generating Unit Attributes

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

Date	Permit No.	Regulated Entity No.
03/11/2025	01636	RN100216373

Unit ID No.	SOP/GOP Index No.	Product Stored	Storage Capacity	WW Tank Control	Maximum TVP	Storage Vessel Description	AMEL ID No.	Guidepole	Reid Vapor Pressure	Control Device ID No.
DMDS-TK	60Kb-1	VOL	40K+	NONE	0.75-11.1	CVS-CD				INCIN
DMDS-TK	60Kb-2	VOL	40K+	NONE	0.75-11.1	CVS-FL				FLARE

Storage Tank/Vessel Attributes
Form OP-UA3 (Page 4)
Federal Operating Permit Program
Table 4a: 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter B: Storage of Volatile Organic Compounds (VOCs)
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
03/11/2025	01636	RN100216373

Unit ID No.	SOP/GOP Index No.	Alternate Control Requirement	ACR ID No.	Product Stored	Storage Capacity	Throughput	Potential to Emit	Uncontrolled Emissions
DMDS-TK	R5112-1	NO		VOC1	A40K+			

Storage Tank/Vessel Attributes
Form OP-UA3 (Page 5)
Federal Operating Permit Program
Table 4b: 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter B: Storage of Volatile Organic Compounds (VOCs)
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
03/11/2025	01636	RN100216373

Unit ID No.	SOP/GOP Index No.	Construction Date	Tank Description	True Vapor Pressure	Primary Seal	Secondary Seal	Control Device Type	Control Device ID No.
DMDS-TK	R5112-1		NONE1	1-				

Texas Commission on Environmental Quality
Loading/Unloading Operations Attributes
Form OP-UA04 (Page 1)

Federal Operating Permit Program

Table 1a: 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)

Subchapter C: Loading and Unloading of Volatile Organic Compounds

Date	Permit No.	Regulated Entity No.
03/11/2025	01636	RN100216373

Unit ID No.	SOP/GOP Index No.	Chapter 115 Facility Type	Alternate Control Requirement (ACR)	ACR ID No.	Product Transferred	Transfer Type	True Vapor Pressure	Daily Throughput	Control Options
GRP-DMDS-LOAD	R5211-1	OTHER	NONE		VOC1	LOAD	0.5+	20K+	BAL

Texas Commission on Environmental Quality
Loading/Unloading Operations Attributes
Form OP-UA04 (Page 2)

Federal Operating Permit Program

Table 1b: 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)

Subchapter C: Loading and Unloading of Volatile Organic Compounds

Date	Permit No.	Regulated Entity No.
03/11/2025	01636	RN100216373

Unit ID No.	SOP/GOP Index No.	Chapter 115 Control Device Type	Chapter 115 Control Device ID No.	Vapor-Tight	Vapor Space Holding Tank	Marine Terminal Exemptions	VOC Flash Point	Uncontrolled VOC Emissions
GRP-DMDS-LOAD	R5211-1			NO				

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 1)
Federal Operating Permit Program
Table 1a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart D: Standards of Performance for Fossil Fuel-Fired Steam Generators
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
03/11/2025	01636	RN100216373

Unit ID No.	SOP Index No.	Construction/Modification Date	Covered Under Subpart Da or KKKK	Changes to Existing Affected Facility	Heat Input Rate	Alternate 42C	PM CEMS	Opacity Monitoring	Gas/Liquids Fuel	Fuels with 0.33 % or Less Sulfur	Specific Site
X-7489	60D-1	78+	NO	NO	250-						

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 6)
Federal Operating Permit Program
Table 3a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Db: Standards of Performance for Industrial-Commercial Steam Generating Units
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
03/11/2025	01636	RN100216373

Unit ID No.	SOP Index No.	Construction/Modification Date	Heat Input Capacity	Subpart Da	Changes to Existing Affected Facility	Subpart Ea, Eb, or AAAA	Subpart KKKK	Subpart Cb or BBBB
X-7489	60DB-1	05+CR	100-					

**Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 13)**

Federal Operating Permit Program

Table 5a: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)

**Subpart B: Combustion Control at Major Industrial, Commercial and
Institutional Sources in Ozone Nonattainment Areas**

Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
03/11/2025	01636	RN100216373

Unit ID No.	SOP Index No.	Unit Type	MRC	RACT Date Placed in Service	Functionally Identical Replacement	Fuel Type	Fuel Type	Fuel Type	Annual Heat Input
X-7489	R7100-1	ICIB	40-						

4. APPLICABLE REQUIREMENTS SUMMARY FORMS

This section contains the following forms and information:

- ▶ Form OP-REQ1 pages 88 and 89 – Application Area-Wide Applicability Determinations and General Information
- ▶ Form OP-REQ2 – Negative Applicable Requirement Determinations
- ▶ Form OP-REQ3 – Applicable Requirements Summary

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.
03/11/2025	O1636	RN100216373

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):
PSDTX1016M1	05/02/2023				

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):

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.
03/11/2025	O1636	RN100216373

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
865A	05/02/2023				

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

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

PBR No.	Version No./Date	PBR No.	Version No./Date	PBR No.	Version No./Date
106.261	11/01/2003				
106.262	11/01/2003				
106.452	09/04/2000				
106.454	11/01/2001				
106.511	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

Form OP-REQ2
Negative Applicable/Superseded Requirement Determinations
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
03/11/2025	01636	RN100216373

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability Reason
A	2	DMDS-CT	OP-REQ2	40 CFR Part 63, Subpart Q	§63.400(a)	The site is not a major source of HAPs, and was not a major source at the time of applicability.
A	2	DMDS-FUG	OP-REQ2	30 TAC Chapter 115, Pet. Refinery & Petrochemicals	§115.352	The process unit doesn't meet the definition of a synthetic organic chemicals manufacturing industry, as defined in §115.10.
A	2	DMDS-FUG	OP-REQ2	40 CFR Part 60, Subpart VVa	§60.489a	The process unit doesn't meet the definition of a synthetic organic chemicals manufacturing industry, as defined in §115.10.
A	2	X-7489	OP-UA06	30 TAC Chapter 112, Sulfur Compounds	§112.8(a), §112.9(a)	Boiler does not fire solid or liquid fuel.
A	2	X-7489	OP-UA06	30 TAC Chapter 117, Subchapter B	§117.103(a)(2)	Boiler is less than 40 MMBtu/hr and is located in Beaumont/Port Arthur area.
A	2	X-7489	OP-UA06	30 TAC Chapter 117, Utility Electric Generation	§117.1000(a)	Boiler is not used for electric power generation.
A	2	X-7489	OP-UA06	40 CFR Part 60, Subpart D	§60.40(a)	Boiler heat input is less than 250 MMBtu/hr.
A	2	X-7489	OP-UA06	40 CFR Part 60, Subpart Da	§60.40Da(a)(1)	Boiler heat input is less than 250 MMBtu/hr.
A	2	X-7489	OP-UA06	40 CFR Part 60, Subpart Db	§60.40b(a)	Boiler heat input is less than 100 MMBtu/hr.
A	2	X-7489	OP-UA06	40 CFR Part 60, Subpart Dc	§60.41c	Boiler generates steam using electricity and therefore does not meet the definition of steam generating unit per §60.41c.

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

Table 1a: Additions

Date: 03/11/2025	Regulated Entity No.: RN100216373	Permit No.: 01636
Company Name: Arkema Inc.	Area Name: Beaumont Facility Chemical Manufacturing	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	DMDS-TK	OP-UA03	R5112-1	VOC	30 TAC Chapter 115, Storage of VOCs	§115.111(a)(1)
2	DMDS-TK	OP-UA03	60Kb-1	VOC	40 CFR Part 60, Subpart Kb	[G]§60.112b(a)(3)
2	DMDS-TK	OP-UA03	60Kb-2	VOC	40 CFR Part 60, Subpart Kb	[G]§60.112b(a)(3) §60.18
2	GRP-DMDS-LOAD	OP-UA04	R5211-1	VOC	30 TAC Chapter 115, Loading and Unloading of VOCs	§115.212(a)(1) §115.212(a)(1)(B) §115.212(a)(3)(A) §115.212(a)(3)(A)(ii) §115.212(a)(3)(B) [G]§115.212(a)(3)(C), (a)(3)(E) §115.214(a)(1)(B), (a)(1)(C)

**Applicable Requirements Summary
Form OP-REQ3 (Page 2)
Federal Operating Permit Program**

Table 1b: Additions

Date: 03/11/2025	Regulated Entity No.: RN100216373	Permit No.: 01636
Company Name: Arkema Inc.	Area Name: Beaumont Facility Chemical Manufacturing	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	DMDS-TK	R5112-1	VOC	[G]§115.117	§115.118(a)(1), (a)(5), (a)(7)	None
2	DMDS-TK	60Kb-1	VOC	[G]§60.113b(c)(1) §60.113b(c)(2) §60.116b(a)-(b) §60.116b(e), (e)(1), [G](e)(3) [G]§60.485(b)	§60.115b, [G](c) §60.116b(a)-(b)	[G]§60.113b(c)(1) §60.115b
2	DMDS-TK	60Kb-2	VOC	§60.113b(d) §60.116b(a)-(b) §60.116b(e), (e)(1), [G](e)(3) [G]§60.485(b)	§60.115b, (d)(2) §60.116b(a)-(b)	§60.115b, (d)(1), (d)(3)
2	GRP-DMDS-LOAD	R5211-1	VOC	§115.212(a)(3)(B) §115.214(a)(1)(A) §115.214(a)(1)(A)(i)-(iii) §115.215, (1), [G](2), (4), (9), (10)	§115.216, (2), (3)(A), (3)(A)(i) §115.216(3)(A)(ii), (3)(A)(iii) §115.216(3)(B)	None

5. MAJOR NSR SUMMARY TABLE

Major NSR Summary Table

Permit Numbers: 865A and PSDTX1016M1					Issuance Date: November 6, 2019 <u>May 2, 2023</u>		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
<u>INCIN</u>	<u>Incinerator - Total</u>	<u>PM</u>	<u>0.89</u>	<u>3.90</u>		<u>5</u>	
		<u>PM₁₀</u>	<u>0.89</u>	<u>3.90</u>		<u>5</u>	
		<u>PM_{2.5}</u>	<u>0.89</u>	<u>3.90</u>		<u>5</u>	
		<u>SO₂</u>	<u>139.00</u>	<u>78.00</u>	<u>13, 12</u>	<u>5, 13, 12</u>	<u>13</u>
		<u>NO_x</u>	<u>1.57</u>	<u>6.87</u>	<u>3, 12</u>	<u>3, 5, 12</u>	<u>3</u>
		<u>CO</u>	<u>2.03</u>	<u>8.90</u>	<u>3, 13, 12</u>	<u>3, 5, 13, 12</u>	<u>3, 13</u>
		<u>VOC</u>	<u>0.37</u>	<u>1.48</u>	<u>13, 12</u>	<u>5, 13, 12</u>	<u>13</u>
		<u>H₂S</u>	<u>0.10</u>	<u>0.42</u>	<u>13</u>	<u>5, 13</u>	<u>13</u>
		<u>TRS</u>	<u>0.36</u>	<u>1.43</u>	<u>13, 12</u>	<u>5, 13, 12</u>	<u>13</u>
<u>SULFOX-TO</u>	<u>Thermal Oxidizer 1</u>	<u>PM</u>	<u>5.71</u>	<u>25.01</u>		<u>5</u>	
		<u>PM₁₀</u>	<u>5.71</u>	<u>25.01</u>		<u>5</u>	
		<u>PM_{2.5}</u>	<u>5.71</u>	<u>25.01</u>		<u>5</u>	
		<u>SO₂ (Normal Operations)</u>	<u>23.66</u>	<u>13.93</u>	<u>14, 12</u>	<u>6, 5, 9, 14, 12</u>	<u>14</u>
		<u>SO₂ (MSS)</u>	<u>100.00</u>		<u>14, 12</u>	<u>6, 5, 9, 14, 12</u>	<u>14</u>
		<u>NO_x</u>	<u>16.16</u>	<u>70.66</u>	<u>14, 12</u>	<u>5, 14, 12</u>	<u>14</u>
		<u>CO</u>	<u>32.70</u>	<u>70.52</u>	<u>14, 12</u>	<u>5, 14, 12</u>	<u>14</u>
		<u>VOC</u>	<u>6.66</u>	<u>15.26</u>	<u>14, 35</u>	<u>6, 5, 14, 13, 35</u>	
		<u>TRS</u>	<u>0.02</u>	<u>0.01</u>	<u>35</u>	<u>6, 5, 35</u>	
<u>S-1</u>	<u>Sulfur Storage Tank</u>	<u>SO₂</u>	<u>0.02</u>	<u>0.02</u>	<u>21</u>	<u>21</u>	
		<u>H₂S</u>	<u>0.03</u>	<u>0.02</u>	<u>21</u>	<u>21</u>	
		<u>TRS</u>	<u>0.03</u>	<u>0.02</u>	<u>21</u>	<u>21</u>	
		<u>SO₂</u>	<u>0.06</u>	<u>0.06</u>	<u>21</u>	<u>21</u>	

Permit Numbers: 865A and PSDTX1016M1					Issuance Date: November 6, 2019 May 2, 2023		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
<u>S-3</u>	<u>Sulfur Truck</u>	<u>H₂S</u>	<u>0.02</u>	<u>0.02</u>	<u>21</u>	<u>21</u>	
		<u>TRS</u>	<u>0.02</u>	<u>0.02</u>	<u>21</u>	<u>21</u>	
<u>F-1</u>	<u>H₂S Plant Fugitives (8)</u>	<u>VOC</u>	<u>< 0.01</u>	<u>0.02</u>	<u>3, 30, 33</u>	<u>3, 5, 30, 33</u>	<u>3</u>
		<u>H₂S</u>	<u>< 0.01</u>	<u>< 0.01</u>	<u>33</u>	<u>5, 33</u>	
		<u>TRS</u>	<u>< 0.01</u>	<u>0.02</u>	<u>33</u>	<u>5, 33</u>	
<u>BMT-1M</u>	<u>Train 1 – MeSH Production Fugitives (8)</u>	<u>VOC</u>	<u>0.19</u>	<u>0.85</u>	<u>3, 30, 33</u>	<u>3, 5, 30, 33</u>	<u>3</u>
		<u>H₂S</u>	<u>0.02</u>	<u>0.07</u>	<u>33</u>	<u>5, 33</u>	
		<u>TRS</u>	<u>0.16</u>	<u>0.72</u>	<u>33</u>	<u>5, 33</u>	
<u>BMT-2M</u>	<u>Train 2 – MeSH Production Fugitives (8)</u>	<u>VOC</u>	<u>0.06</u>	<u>0.25</u>	<u>3, 30, 33</u>	<u>3, 5, 30, 33</u>	<u>3</u>
		<u>H₂S</u>	<u>0.02</u>	<u>0.10</u>	<u>33</u>	<u>5, 33</u>	
		<u>TRS</u>	<u>0.04</u>	<u>0.17</u>	<u>33</u>	<u>5, 33</u>	
<u>ACRO-Fug</u>	<u>Acrolein Process Fugitives (8)</u>	<u>VOC</u>	<u>0.35</u>	<u>1.52</u>	<u>3, 31, 32, 36, 39</u>	<u>3, 31, 32, 36, 39</u>	<u>3</u>
		<u>H₂S</u>	<u>< 0.01</u>	<u>< 0.01</u>	<u>31, 32</u>	<u>31, 32</u>	
		<u>TRS</u>	<u>< 0.01</u>	<u>< 0.01</u>	<u>31, 32</u>	<u>31, 32</u>	
<u>MMP-Fug</u>	<u>MMP Process Area Fugitives (8)</u>	<u>VOC</u>	<u>0.17</u>	<u>0.73</u>	<u>3, 33</u>	<u>3, 5, 33</u>	<u>3</u>
		<u>TRS</u>	<u>0.08</u>	<u>0.35</u>	<u>33</u>	<u>5, 33</u>	
Column Main	Acrolein Unit Column/Filter	VOC	0.01	0.01			
D307	Methanol Tank	VOC	2.32	0.22	3, 19	3, 18, 19	3
	Methanol Tank (MSS)	VOC (9)	3.08	1.86	3, 4349	3, 18, 4349	3
D2307	Methanol Tank	VOC	2.32	0.22	3, 19	3, 18, 19	3
	Methanol Tank (MSS)	VOC (9)	3.08	1.86	3, 4349	3, 18, 4349	3
D398	Gasoline Tank	VOC	4.56	0.22			
D215	Diesel Tank	VOC	0.02	0.01			
D399	Diesel Tank	VOC	0.02	0.01			

Permit Numbers: 865A and PSDTX1016M1					Issuance Date: November 6, 2019 May 2, 2023		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
D3191A	Diesel Tank	VOC	0.02	0.01			
D3191B	Diesel Tank	VOC	0.02	0.01			
D8540	Caustic Tank	NaOH	0.01	0.01			
FLARE	Flare Limits both routine and MSS operation (5)(6)	CO	193.54	74.35	11	5, 11	
		H₂S	24.08	2.82	11	5, 11	
		H₂SO₄	7.21	31.57	11	5, 11	
		H₂SO₄ (5)	29.18		11	5, 11	
		NOx	22.56	8.67	11	5, 11	
		SO₂	625.00	448.96	11	5, 13, 11	
		SO₂ (5)	3065.51		11	5, 13, 11	
		TRS	37.52 37.87	8.84	11, 34 34	5, 11, 34 34	
		TRS (5)	92.52		11, 34 34	5, 11, 34 34	
		VOC	49.38	6.63	3, 11, 34 34	3, 5, 13, 11, 34 34	3
		VOC (5)	70.32		3, 11, 34 34	3, 5, 13, 11, 34 34	3
<u>H401/H402</u>	<u>Sulfur Heater 401 & Methane Heater 402 (7)</u>	<u>CO</u>	<u>1.32</u>	<u>5.77</u>			
		<u>NOx</u>	<u>1.61</u>	<u>7.04</u>	<u>3</u>	<u>3</u>	<u>3</u>
		<u>PM</u>	<u>0.11</u>	<u>0.52</u>			
		<u>PM₁₀</u>	<u>0.11</u>	<u>0.52</u>			
		<u>PM_{2.5}</u>	<u>0.11</u>	<u>0.52</u>			
		<u>SO₂</u>	<u>0.01</u>	<u>0.05</u>	<u>8.3</u>	<u>8.3</u>	<u>3</u>
		<u>VOC</u>	<u>0.09</u>	<u>0.38</u>			
<u>H501/H502</u>	<u>Sulfur Heater 501 & Methane Heater 502 (7)</u>	<u>CO</u>	<u>1.32</u>	<u>5.77</u>			
		<u>NOx</u>	<u>1.61</u>	<u>7.04</u>	<u>3</u>	<u>3</u>	<u>3</u>
		<u>PM</u>	<u>0.11</u>	<u>0.52</u>			

Permit Numbers: 865A and PSDTX1016M1					Issuance Date: November 6, 2019 May 2, 2023		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		PM ₁₀	0.11	0.52			
		PM _{2.5}	0.11	0.52			
		SO ₂	0.01	0.05	8, 3	8, 3	3
		VOC	0.09	0.38			
SULFOX-CT	Sulfox Cooling Tower	PM	0.04	0.18			
		PM ₁₀	0.04	0.18			
		PM _{2.5}	0.04	0.18			
		VOC	0.43	1.89	3, 26	3, 26	3
SULFOX-INH	Bag Filter	PM	0.08	0.01			
		PM ₁₀	0.08	0.01			
		PM _{2.5}	0.08	0.01			
BMT-1E/T	Train 1 – EtSH or TBM Production Fugitives (8)	VOC	0.07	0.31	3, 30, 33	3, 5, 30, 33	3
		H ₂ S	< 0.01	0.01	33	5, 33	
		TRS	< 0.01	0.01	33	5, 33	
STORAGE	Storage Tanks Fugitives (8)	VOC	0.21	0.93	3, 30, 33, 49	3, 5, 30, 33, 49	3, 49
		TRS	0.18	0.80	33, 49	5, 33, 49	49
SulfoxChlr	Sulfox Chiller System (8)	HCFC	0.01	0.01	3	3	3
H202	Heat Transfer Fluid Heater (31 MMBtu/hr)	CO	2.59	11.32			
		NOx	3.08	13.48	3	3	3
		PM/PM _{2.5} /PM ₁₀	0.23	1.02			
		PM ₁₀	0.23	1.02			
		PM _{2.5}	0.23	1.02			
		SO ₂ SO ₂	0.02	0.08	8, 3	8, 3	3
		VOC	0.17	0.74			

Permit Numbers: 865A and PSDTX1016M1					Issuance Date: November 6, 2019 May 2, 2023		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
H401/H402	Sulfur Heater 401 & Methane Heater 402 (7)	CO	1.32	5.77			
		NOx	1.61	7.04	3	3	3
		PM/PM2.5/PM10	0.11	0.52			
		SO2	0.01	0.05	8, 3	8, 3	3
		VOC	0.09	0.38			
H2202	Heat Transfer Fluid Heater (31 MMBtu/hr)	CO	2.59	11.32			
		NOx	3.08	13.48	3	3	3
		PM/PM2.5/PM10	0.23	1.02			
		PM10	0.23	1.02			
		PM2.5	0.23	1.02			
		SO2/SO2	0.02	0.08	8, 3	8, 3	3
		VOC	0.17	0.74			
INCIN	Incinerator—Total	CO	2.03	8.90	3, 13, 12	3, 5, 13, 12	3, 13
		H2S	0.10	0.42	13	5, 13	13
		NOx	1.57	6.87	3, 12	3, 5, 12	3
		PM/PM2.5/PM10	0.89	3.90		5	
		SO2	139.00	78.00	13, 12	5, 13, 12	13
		VOC	0.37	1.48	13, 32	5, 13, 32	13
		TRS	0.36	1.43	13, 32	5, 13, 32	13
S-1	Sulfur Storage Tank	H2S	0.03	0.02	24	24	
		SO2	0.02	0.02	24	24	
		TRS	0.03	0.02	24	24	
S-3	Sulfur Truck	H2S	0.02	0.02	24	24	
		SO2	0.064	0.064	24	24	

Permit Numbers: 865A and PSDTX1016M1					Issuance Date: November 6, 2019 May 2, 2023		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		TRS	0.02	0.02	24	24	
SULFOX-CT	Sulfox Cooling Tower	PM/PM2.5/PM10	0.04	0.18			
		VOC	0.43	1.89	3, 25	3, 25	3
SULFOX-INH	Bag Filter	PM/PM2.5/PM10	0.08	0.04			
SULFOX-TO	Thermal Oxidizer	CO	32.70	70.52	14, 12	5, 14, 12	14
		NOx	16.16	70.66	14, 12	5, 14, 12	14
		PM/PM2.5/PM10	5.74	25.04		5	
		SO2 (Normal Operations)	23.66	13.93	14, 12	6, 5, 9, 14, 12	14
		SO2 (MSS)	100.00		14, 12	6, 5, 9, 14, 12	14
		TRS	0.02	0.04	32	6, 5, 32	
		VOC	6.66	15.26	14, 32	6, 5, 14, 13, 32	
X-426A	Steam Boiler (15.8 MMBtu/hr)	CO	1.33	5.81			
		NOx	2.05	9.00	3	3	3
		PM/PM2.5/PM10	0.12	0.53			
		PM10	0.12	0.53			
		PM2.5	0.12	0.53			
		SO2 SO2	0.01	0.04	8, 3	8, 3	3
		VOC	0.09	0.38			
X-426B	Steam Boiler (15.8 MMBtu/hr)	CO	1.33	5.81			
		NOx	2.05	9.00	3	3	3
		PM	0.12	0.53			
		PM10	0.12	0.53			
		PM2.5	0.12	0.53			
		SO2	0.01	0.04	8, 3	8, 3	3

TCEQ-20648 (APD-ID164v1.0, Revised 09/22) Major NSR Summary Table

This form is for use by facilities subject to air quality permit requirements and may be revised periodically.

Permit Numbers: 865A and PSDTX1016M1					Issuance Date: November 6, 2019 May 2, 2023		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		VOC	0.09	0.38			
DMDS-LOADT	DMDS Truck Loading – Uncaptured Emissions	VOC	0.39	<0.01		25	
		TRS	0.39	<0.01		25	
DMDS-CT	DMDS Cooling Tower	PM	0.01	0.04	28	28	
		PM ₁₀	0.01	0.03	28	28	
		PM _{2.5}	<0.01	<0.01	28	28	
		VOC	0.04	0.18	27, 28	27, 28	
DMDS-FUG	DMDS Fugitives (8)	VOC	0.22	0.98	33	5, 33	
		H ₂ S	0.03	0.13	33	33	
		TRS	0.33	0.08	33	33	
ACRO-Fug	Acrolein Process Fugitives (5)	VOC	0.35	1.52	3, 28, 29, 33, 36	3, 28, 29, 33, 36	3
		H ₂ S	0.04	0.04	28, 29	28, 29	
		TRS	0.04	0.04	28, 29	28, 29	
BMT-1E/T	Train 1 — EtSH or TBM Production Fugitives (8)	H ₂ S	0.04	0.04	30	5, 30	
		TRS	0.04	0.04	30	5, 30	
		VOC	0.07	0.34	3, 27, 30	3, 5, 27, 30	3
BMT-1M	Train 1 — MeSH Production Fugitives (8)	H ₂ S	0.02	0.07	30	5, 30	
		TRS	0.16	0.72	30	5, 30	
		VOC	0.19	0.85	3, 27, 30	3, 5, 27, 30	3
BMT-2M	Train 2 — MeSH Production Fugitives (8)	H ₂ S	0.02	0.10	30	5, 30	
		TRS	0.04	0.17	30	5, 30	
		VOC	0.06	0.25	3, 27, 30	3, 5, 27, 30	3
F-4	H ₂ S Plant Process Fugitives (8)	H ₂ S	0.04	0.04	30	5, 30	
		TRS	0.04	0.02	30	5, 30	

Permit Numbers: 865A and PSDTX1016M1					Issuance Date: November 6, 2019 May 2, 2023		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		VOC	0.01	0.02	3, 27, 30	3, 5, 27, 30	3
MMP-Fug	MMP Process Area Fugitives (8)	VOC	0.17	0.73	3, 30	3, 5, 30	3
		TRS	0.08	0.35	30	5, 30	
STORAGE	Storage Tanks Fugitives (8)	TRS	0.18	0.80	30, 43	5, 30, 43	43
		VOC	0.24	0.93	3, 27, 30, 43	3, 5, 27, 30, 43	3, 43
SulfoxChlr	Sulfox Chiller System (8)	HCFC	0.01	0.01	3	3	3

- (1) Emission point identification – either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3) CO – carbon monoxide
NO_x – total oxides of nitrogen
PM – total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}
PM₁₀ – particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}
PM_{2.5} – particulate matter equal to or less than 2.5 microns in diameter
SO₂ – sulfur dioxide
VOC – volatile organic compounds as defined in Title 30 Texas Administrative Code 101.1
NaOH – sodium hydroxide
H₂SO₄ – sulfuric acid
H₂S – hydrogen sulfide
TRS – total reduced sulfur, includes H₂S and sulfur bearing VOC, excludes SO₂
HCFC – hydrochlorofluorocarbons
- (4) Compliance with annual emission limits (tons per year) is based on a 12-month rolling period.
- (5) Allowable Flare short term rate during high flow events, limited to 100 hours per year.
- (6) Includes operation of the flare as backup control device for EPN SULFOX-TO when it is not operating and 416 hours per calendar year for EPN INCIN when it is not operating.
- (7) Common exhaust stack.
- (8) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.
- (9) Planned startup, shutdown and maintenance activity emissions.

Texas Commission on Environmental Quality

Title V Existing

1636

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	BEAUMONT FACILITY CHEMICAL MANUFACTURING
County	JEFFERSON
Latitude (N) (##.#####)	30.058055
Longitude (W) (-###.#####)	94.056944
Primary SIC Code	2869
Secondary SIC Code	
Primary NAICS Code	325199
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN100216373
What is the name of the Regulated Entity (RE)?	ARKEMA BEAUMONT PLANT
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	2810 GULF STATES RD
City	BEAUMONT
State	TX
ZIP	77704
County	JEFFERSON
Latitude (N) (##.#####)	30.058055
Longitude (W) (-###.#####)	-94.056944
Facility NAICS Code	
What is the primary business of this entity?	MERCAPTANS & SULFIDES

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN600124044
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Arkema Inc.
Texas SOS Filing Number	1221906
Federal Tax ID	230960890
State Franchise Tax ID	12309608904
State Sales Tax ID	
Local Tax ID	
DUNS Number	2290773
Number of Employees	501+
Independently Owned and Operated?	Yes

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	ARKEMA INC
Prefix	MR
First	NICHOLAS
Middle	
Last	FERRACO
Suffix	
Credentials	
Title	PLANT MANAGER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 1427
Routing (such as Mail Code, Dept., or Attn:)	
City	BEAUMONT
State	TX
ZIP	77704
Phone (###-###-####)	4099515232
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	nick.ferraco@sartomer.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.	New Contact
Organization Name	Arkema Inc
Prefix	MS
First	Christy
Middle	
Last	Hollier
Suffix	
Credentials	
Title	Environmental Specialist
Enter new address or copy one from list:	Responsible Official Contact
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	2810 GULF STATES ROAD
Routing (such as Mail Code, Dept., or Attn:)	
City	BEAUMONT
State	TX
ZIP	77701
Phone (###-###-####)	4099515361
Extension	
Alternate Phone (###-###-####)	

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

E-mail

christy.hollier@arkema.com

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	30 Deg 3 Min 29 Sec
3) Permit Longitude Coordinate:	94 Deg 3 Min 25 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

Arkema SOP O1636 Minor Revision Application FINAL.pdf

Hash	67825E6DAF144813546B51F358F4EA76008009FAFB4CDB40448D2FBF164A93E3
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
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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 Nicholas R Ferraco, the owner of the STEERS account ER090639.
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 1636.
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: Nicholas R Ferraco OWNER OPERATOR

Account Number:	ER090639
Signature IP Address:	165.1.200.66
Signature Date:	2025-03-13
Signature Hash:	DEE63371ED2A941CA5C3C23443746A4B9F85BA6EBC1264B951E68A1F0ED64276
Form Hash Code at time of Signature:	8E73E4EB4A58528E15DAFF6299645631F613F711A147951E88E329A4BB257BDF

Submission

Reference Number:	The application reference number is 768675
Submitted by:	The application was submitted by ER090639/Nicholas R Ferraco
Submitted Timestamp:	The application was submitted on 2025-03-13 at 13:39:32 CDT
Submitted From:	The application was submitted from IP address 165.1.200.66
Confirmation Number:	The confirmation number is 638918
Steers Version:	The STEERS version is 6.88
Permit Number:	The permit number is 1636

Additional Information

Application Creator: This account was created by Heriberto Quintanilla