

## Texas Commission on Environmental Quality

Title V Existing

1636

### Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	ARKEMA BEAUMONT PLANT
County	JEFFERSON
Latitude (N) (##.#####)	30.059166
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.	CHRISTY HOLLIER(ARKEMA INC... )
Organization Name	ARKEMA INC
Prefix	MS
First	CHRISTY
Middle	
Last	HOLLIER
Suffix	
Credentials	
Title	ENVIRONMENTAL SPECIALIST
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 1427
Routing (such as Mail Code, Dept., or Attn:)	
City	BEAUMONT
State	TX
ZIP	77704
Phone (###-###-####)	4099515361
Extension	
Alternate Phone (###-###-####)	

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

E-mail

christy.hollier@arkema.com

## Title V General Information - Existing

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1) Permit Type:	SOP
2) Permit Latitude Coordinate:	30 Deg 3 Min 33 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?	Update
4.1. Select the permit/project number for which this update should be applied.	1636-37813
5) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	No

## Title V Attachments Existing

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Attach OP-1 (Site Information Summary)

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

Attach OP-ACPS (Application Compliance Plan and Schedule)

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

[File Properties]

File Name	<a href=/ePermitsExternal/faces/file?fileId=301112>OP-REQ1 pg 83.pdf</a>
Hash	B726BC4B5A500B2546C57C883C73F8F054C5765A57B500F29DC5941AB19A9A33
MIME-Type	application/pdf

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

[File Properties]

File Name	<a href=/ePermitsExternal/faces/file?fileId=301113>OP-REQ2.pdf</a>
Hash	361347C8C0C5C8EBE04943A26C68D47A8CDA5743DEDEC2E18CE3407CB1FF8387
MIME-Type	application/pdf

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)

[File Properties]

File Name	<a href=/ePermitsExternal/faces/file?fileId=301114>OP-MON (2025-1029 0930).pdf</a>
Hash	4ADA68512C5B9A718B610EB85D13731BCC317E1F559ACABAC1F7B144A8433499
MIME-Type	application/pdf

Attach OP-UA (Unit Attribute) Forms

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

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name	<a href="/ePermitsExternal/faces/file?fileId=301115">Major NSR Summary Table - O1636 Arkema Inc (Minor 37813)V2 (2025-1120)_HQ.docx</a>
Hash	0522F9CBFB755C3663DBFD6AD04454C0648691C62B1BF571732D24209B09526E
MIME-Type	application/vnd.openxmlformats-officedocument.wordprocessingml.document

[File Properties]

File Name	<a href="/ePermitsExternal/faces/file?fileId=301116">Major NSR Summary Table 865A (2025-0306).docx</a>
Hash	618125FAE6FBFE94CDE5865CDA16E15E84406781C3527EE87C5CDBB6DBF3ECC5
MIME-Type	application/vnd.openxmlformats-officedocument.wordprocessingml.document

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

## 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:	12.144.25.170
Signature Date:	2025-12-16

Signature Hash: DEE63371ED2A941CA5C3C23443746A4B9F85BA6EBC1264B951E68A1F0ED64276  
Form Hash Code at  
time of Signature: 6649DAA7D7BB5A1EBAEE74BD2F8FA280FEF3D3FF20898A2D088857A5065A3591

## Submission

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Reference Number:	The application reference number is 864653
Submitted by:	The application was submitted by ER090639/Nicholas R Ferraco
Submitted Timestamp:	The application was submitted on 2025-12-16 at 16:36:48 CST
Submitted From:	The application was submitted from IP address 12.144.25.170
Confirmation Number:	The confirmation number is 714870
Steers Version:	The STEERS version is 6.93
Permit Number:	The permit number is 1636

## Additional Information

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Application Creator: This account was created by Heriberto Quintanilla

**From:** [Eddie Quintanilla](#)  
**To:** [Liam Lin](#)  
**Cc:** [Pete Buckman](#); [HOLLIER Christy](#)  
**Subject:** RE: Working Draft Permit -- FOP O1636/Project 37813, Arkema Inc/Beaumont Facility  
**Date:** Monday, December 1, 2025 3:54:15 PM

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Hey Liam!

The WDP is approved. FYI, we will be submitting the renewal application for this permit number this week, but we would like you to go ahead and move this project forward with the Public Announcement and keep it separate from the renewal, if possible.

Let me know if you need anything else,

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

Trinity Consultants  
9737 Great Hills Trail, Ste. 340, Austin, TX 78759  
Office: 737-284-0687

[heriberto.quintanilla@trinityconsultants.com](mailto:heriberto.quintanilla@trinityconsultants.com)

Trinity logo for email



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**From:** Liam Lin <Liam.Lin@tceq.texas.gov>  
**Sent:** Wednesday, November 26, 2025 11:46 AM  
**To:** Eddie Quintanilla <Heriberto.Quintanilla@trinityconsultants.com>  
**Cc:** Pete Buckman <pbuckman@trinityconsultants.com>; HOLLIER Christy <christy.hollier@arkema.com>  
**Subject:** RE: Working Draft Permit -- FOP O1636/Project 37813, Arkema Inc/Beaumont Facility

Good Morning Eddie,

I have attached an updated WDP and Major NSR Summary table for your review. Since this is a follow-up review to the previously submitted and reviewed WDP, only comments concerning changes since the last WDP may be considered by TCEQ. Any comments outside the scope of the most recent changes should be submitted as a separate project.

Please review the WDP and the major NSR summary table and submit to me any comments you have on the working draft permit by Noon on **December 4, 2025**. If you do not have any comments, please reply to this email with your approval of both documents.

Thank you for your cooperation in this matter. Happy Thanksgiving!

Sincerely,

*Liam Lin*

Permit Reviewer  
OA/Air Permits Division/OP Section  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Liam.Lin@tceq.texas.gov](mailto:Liam.Lin@tceq.texas.gov)

Phone: (512) 239-1278  
Fax: (512) 239-1400



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**From:** Eddie Quintanilla <[Heriberto.Quintanilla@trinityconsultants.com](mailto:Heriberto.Quintanilla@trinityconsultants.com)>  
**Sent:** Friday, November 21, 2025 2:51 PM  
**To:** Liam Lin <[Liam.Lin@tceq.texas.gov](mailto:Liam.Lin@tceq.texas.gov)>  
**Cc:** Pete Buckman <[pbuckman@trinityconsultants.com](mailto:pbuckman@trinityconsultants.com)>; HOLLIER Christy <[christy.hollier@arkema.com](mailto:christy.hollier@arkema.com)>  
**Subject:** RE: Working Draft Permit -- FOP O1636/Project 37813, Arkema Inc/Beaumont Facility

Hey Liam!

I have reviewed the WDP and have the following comments:

1. Permit is missing the issuance date.
2. Have the following grammar corrections to Special Term and Condition 1.E: Emission units subject to 40 CFR Part 63, Subparts ZZZZ and VVVVVV as identified in the attached Applicable Requirements Summary table are subject to 30 TAC Chapter 113, Subchapter C, § 113.1090 and § 113.1495, **respectively**, which incorporates the 40 CFR Part 63 Subparts by reference.
3. Special Term and Condition is missing for Periodic Monitoring. See attached a revised OP-REQ1 pg 83
4. Made some track changes to the Major NSR Summary Table. Some conditions were missing, so I re-added them

Let me know if you have any questions. Happy Thanksgiving!

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

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Trinity logo for email

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**From:** Liam Lin <[Liam.Lin@tceq.texas.gov](mailto:Liam.Lin@tceq.texas.gov)>

**Sent:** Monday, November 17, 2025 3:23 PM

**To:** Eddie Quintanilla <[Heriberto.Quintanilla@trinityconsultants.com](mailto:Heriberto.Quintanilla@trinityconsultants.com)>

**Cc:** HOLLIER Christy <[christy.hollier@arkema.com](mailto:christy.hollier@arkema.com)>; Pete Buckman <[pbuckman@trinityconsultants.com](mailto:pbuckman@trinityconsultants.com)>

**Subject:** RE: Working Draft Permit -- FOP O1636/Project 37813, Arkema Inc/Beaumont Facility

Good Afternoon Eddie,

I have conducted a technical review of *revision* application for *Arkema Inc, Beaumont Facility*. An electronic copy of the Working Draft Permit (WDP) is attached for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided.

1. Major NSR Summary Table – I have included an updated Major NSR Summary Table for your review. According to the Major NSR Summary Table Instructions, Special Condition should be listed by Emission Points (EP) and not on a pollutant-by-pollutant basis. I have consolidated the Special Condition numbers and listed it by EP. Please review the Major NSR Summary table and provide any comments by the deadline. If you do not have any comments, please reply to this email with your approval of the table.
2. OP-REQ2 – Unfortunately, since this is a minor revision application, we cannot approve the permit shields at this time, please re-request the permit shields in the next significant revision or renewal.
3. OP-MON – For Unit ID DMDS-TK only 60Kb-1 requires Periodic Monitoring, 60Kb-2 does not require OP-MON. We will disregard the OP-MON Submittal for 60Kb-2, no further action is needed.

Please review the WDP and submit to me any comments you have on the working draft permit by Close of Business, **November 24, 2025**.

Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

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

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified

application information, including application updates supporting the WDP comments, is required. After final review of the WDP, additional changes supported by application updates may require certification. I will advise you of these changes at a later date. Prior to transmittal of the Public Notice/Announcement Authorization Package, a duly signed OP-CRO1 form may be required which includes the specific dates or time-period of all submitted application documentation that was not previously certified. I will advise you of this requirement prior to sending the Public Notice/Announcement Authorization.

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

Please notify me when these updates have been submitted.

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

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

Thank you for your cooperation.

Sincerely,

*Liam Lin*

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

[Liam.Lin@tceq.texas.gov](mailto:Liam.Lin@tceq.texas.gov)

Phone: (512) 239-1278

Fax: (512) 239-1400



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**From:** Eddie Quintanilla <Heriberto.Quintanilla@trinityconsultants.com>  
**Sent:** Wednesday, October 29, 2025 3:34 PM  
**To:** Liam Lin <Liam.Lin@tceq.texas.gov>  
**Cc:** HOLLIER Christy <christy.hollier@arkema.com>; Pete Buckman <pbuckman@trinityconsultants.com>  
**Subject:** RE: Technical Review -- FOP O1636/Project 37813, Arkema Inc/Beaumont Facility

Good afternoon Liam!

Good to hear from you!

On behalf of Arkema, see our responses below in red. Also, see attached the updated documents pertaining our responses. Let me know if you need anything else

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

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Office: 737-284-0687  
[heriberto.quintanilla@trinityconsultants.com](mailto:heriberto.quintanilla@trinityconsultants.com)



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**From:** Liam Lin <Liam.Lin@tceq.texas.gov>  
**Sent:** Friday, October 24, 2025 8:37 AM  
**To:** Eddie Quintanilla <heriberto.quintanilla@trinityconsultants.com>  
**Cc:** [christy.hollier@arkema.com](mailto:christy.hollier@arkema.com)  
**Subject:** RE: Technical Review -- FOP O1636/Project 37813, Arkema Inc/Beaumont Facility

Good Afternoon Heriberto ,

There are a few issues with the application which are listed below.

1. OP-MON
  - a. Form OP-MON is required for Unit ID. DMDS-TK, SOP Index numbers 60Kb-1, and 60Kb-2, for regulation 40 CFR Part 60, Subpart Kb. **See attached the form OP-MON for DMDS-TK, index numbers 60Kb-1 and 2**
2. Form OP-REQ2 **See attached the revised OP-REQ2**
  - a. Unit ID. X-7489, 40 CFR Part 60, Subpart D – For the negative applicability citation you put §60.40(a), please specify if the citation should be §60.40(a)1 “fossil- fuel-fired steam generating unit” or §60.40(a)2 “fossil-fuel and wood - residue fired steam generating unit” **the citation should be §60.40(a)1**
  - b. Unit ID. X-7489, 40 CFR Part 60, Subpart Dc – You listed the negative

**Texas Commission on Environmental Quality  
Monitoring Requirements  
Form OP-MON (Page 1)  
Federal Operating Permit Program  
Table 1a: CAM/PM Additions**

<b>I. Identifying Information</b>		
Account No.:	RN No.: <b>RN100216373</b>	CN: <b>CN600124044</b>
Permit No.: <b>O1636</b>	Project No.: <b>37813</b>	
Area Name: <b>Beaumont Facility Chemical Manufacturing</b>		
Company Name: <b>Arkema, Inc.</b>		
<b>II. Unit/Emission Point/Group/Process Information</b>		
Revision No.:		
Unit/EPN/Group/Process ID No.: <b>DMDS-TK</b>		
Applicable Form: <b>OP-UA3</b>		
<b>III. Applicable Regulatory Requirement</b>		
Name: <b>40 CFR Part 60, Subpart Kb</b>		
SOP/GOP Index No.: <b>60Kb-1</b>		
Pollutant: <b>VOC</b>		
Main Standard: <b>[G]§60.112b(a)(3)</b>		
<b>IV. Title V Monitoring Information</b>		
Monitoring Type: <b>PM</b>		
Unit Size:		
CAM/PM Option No.: <b>PM-V-007</b>		
Deviation Limit: <b>It is a deviation if the combustion temperature &lt; 1380°F</b>		
CAM/PM Option No.:		
Deviation Limit:		
<b>V. Control Device Information</b>		
Control Device ID No.: <b>INCIN</b>		
Control Device Type: <b>DIRFLM</b>		

**Texas Commission on Environmental Quality  
Monitoring Requirements  
Form OP-MON (Page 2)  
Federal Operating Permit Program**

**Table 1a: CAM/PM Additions**

<b>I. Identifying Information</b>		
Account No.:	RN No.: <b>RN100216373</b>	CN: <b>CN600124044</b>
Permit No.: <b>O1636</b>	Project No.: <b>37813</b>	
Area Name: <b>Beaumont Facility Chemical Manufacturing</b>		
Company Name: <b>Arkema, Inc.</b>		
<b>II. Unit/Emission Point/Group/Process Information</b>		
Revision No.:		
Unit/EPN/Group/Process ID No.: <b>DMDS-TK</b>		
Applicable Form: <b>OP-UA3</b>		
<b>III. Applicable Regulatory Requirement</b>		
Name: <b>40 CFR Part 60, Subpart Kb</b>		
SOP/GOP Index No.: <b>60Kb-2</b>		
Pollutant: <b>VOC</b>		
Main Standard: <b>[G]§60.112b(a)(3)</b>		
<b>IV. Title V Monitoring Information</b>		
Monitoring Type: <b>PM</b>		
Unit Size:		
CAM/PM Option No.: <b>PM-V-003</b>		
Deviation Limit: <b>No pilot flame</b>		
CAM/PM Option No.:		
Deviation Limit:		
<b>V. Control Device Information</b>		
Control Device ID No.: <b>FLARE</b>		
Control Device Type: <b>FLARE</b>		

**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)(1)	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	§60.40c(a)	Boiler generates steam using electricity and therefore does not meet the definition of steam generating unit per §60.41c.

applicability citation as §60.41c however, based on your reasoning, I believe the citation should be §60.40c(a), please update form OP-REQ2. **We agree, the citation has been revised to §60.40c(a)**

3. I have attached the updated Major NSR Summary table for your review. Please utilize the track change mode on word to make any changes or corrections to the table. If you do not have any comments regarding the Major NSR Summary table, please reply to this email with "We have no comments on the major NSR Summary Table". **The Major NSR Summary table has the correct data, but shouldn't the rows and units have the same order as the MAERT? See attached our updated Major NSR Summary table with track changes**

Please review the Major NSR Summary table and submit the updated forms through STEERS by Noon on **October 31, 2025**. Please notify me via email once this step is completed.

Sincerely,

*Liam Lin*

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

[Liam.Lin@tceq.texas.gov](mailto:Liam.Lin@tceq.texas.gov)

Phone: (512) 239-1278

Fax: (512) 239-1400



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---

**From:** Liam Lin

**Sent:** Friday, April 11, 2025 10:07 AM

**To:** [heriberto.quintanilla@trinityconsultants.com](mailto:heriberto.quintanilla@trinityconsultants.com)

**Cc:** [christy.hollier@arkema.com](mailto:christy.hollier@arkema.com)

**Subject:** Technical Review -- FOP O1636/Project 37813, Arkema Inc/Beaumont Facility

Good Morning Mr. Quintanilla,

I have been assigned to the Federal Operating Permit (FOP) revision application of Permit No. O1636 for Arkema. This application has been assigned Project No. 37813.

Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

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

Please notify me when these updates have been submitted.

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

Please review the “SOP Technical Review Fact Sheet” located at [http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_factsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf). This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

*Liam Lin*

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

[Liam.Lin@tceq.texas.gov](mailto:Liam.Lin@tceq.texas.gov)

Phone: (512) 239-1278

Fax: (512) 239-1400



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## 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:	
Mailing Address	Responsible Official Contact
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

<a href=/ePermitsExternal/faces/file?fileId=244773>Arkema SOP O1636 Minor Revision Application FINAL.pdf</a>

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

## 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

---



9737 Great Hills Trail, Suite 340, Austin, TX 78759 / P 713-955-1230 / F (713) 955-1201 / [trinityconsultants.com](http://trinityconsultants.com)

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](mailto: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 O1636**

**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



## **TABLE OF CONTENTS**

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<b>1. PROJECT INFORMATION</b>	<b>1-1</b>
<b>2. ADMINISTRATIVE FORMS</b>	<b>2-1</b>
<b>3. UNIT ATTRIBUTE FORMS</b>	<b>3-1</b>
<b>4. APPLICABLE REQUIREMENTS SUMMARY FORMS</b>	<b>4-1</b>
<b>5. MAJOR NSR SUMMARY TABLE</b>	<b>5-2</b>

## 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		
<b>I. Application Type</b>													
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												
<b>II. Qualification Statement</b>													
For SOP Revisions Only								X	YES		NO		
For GOP Revisions Only									YES		NO		
<b>III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)</b>													
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 <sub>x</sub>	X	SO <sub>2</sub>		PM <sub>10</sub>	X	CO		Pb		HAPs
Other:													
<b>IV. Reference Only Requirements (For reference only)</b>													
Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)?								X	YES		NO		N/A
<b>V. Delinquent Fees and Penalties</b>													
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**

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

<b>Unit ID No.</b>	<b>SOP/GOP Index No.</b>	<b>Product Stored</b>	<b>Storage Capacity</b>	<b>WW Tank Control</b>	<b>Maximum TVP</b>	<b>Storage Vessel Description</b>	<b>AMEL ID No.</b>	<b>Guidepole</b>	<b>Reid Vapor Pressure</b>	<b>Control Device ID No.</b>
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**

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

<b>Unit ID No.</b>	<b>SOP/GOP Index No.</b>	<b>Alternate Control Requirement</b>	<b>ACR ID No.</b>	<b>Product Stored</b>	<b>Storage Capacity</b>	<b>Throughput</b>	<b>Potential to Emit</b>	<b>Uncontrolled Emissions</b>
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](http://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](http://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**

<b>Date:</b> 03/11/2025	<b>Regulated Entity No.:</b> RN100216373	<b>Permit No.:</b> O1636
<b>Company Name:</b> Arkema Inc.	<b>Area Name:</b> 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**

<b>Date:</b> 03/11/2025	<b>Regulated Entity No.:</b> RN100216373	<b>Permit No.:</b> O1636
<b>Company Name:</b> Arkema Inc.	<b>Area Name:</b> 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

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Major NSR Summary Table

Permit Numbers: 865A and PSDTX1016M1					Issuance Date: <del>November 6, 2019</del> <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>PM<sub>10</sub></u>	<u>0.89</u>	<u>3.90</u>		<u>5</u>	
		<u>PM<sub>2.5</sub></u>	<u>0.89</u>	<u>3.90</u>		<u>5</u>	
		<u>SO<sub>2</sub></u>	<u>139.00</u>	<u>78.00</u>	<u>13, 12</u>	<u>5, 13, 12</u>	<u>13</u>
		<u>NO<sub>x</sub></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>H<sub>2</sub>S</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>PM<sub>10</sub></u>	<u>5.71</u>	<u>25.01</u>		<u>5</u>	
		<u>PM<sub>2.5</sub></u>	<u>5.71</u>	<u>25.01</u>		<u>5</u>	
		<u>SO<sub>2</sub> (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>SO<sub>2</sub> (MSS)</u>	<u>100.00</u>		<u>14, 12</u>	<u>6, 5, 9, 14, 12</u>	<u>14</u>
		<u>NO<sub>x</sub></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>SO<sub>2</sub></u>	<u>0.02</u>	<u>0.02</u>	<u>21</u>	<u>21</u>	
		<u>H<sub>2</sub>S</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>SO<sub>2</sub></u>	<u>0.06</u>	<u>0.06</u>	<u>21</u>	<u>21</u>	

Permit Numbers: 865A and PSDTX1016M1					Issuance Date: <del>November 6, 2019</del> <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
S-3	Sulfur Truck	H <sub>2</sub> S	<u>0.02</u>	<u>0.02</u>	<u>21</u>	<u>21</u>	
		TRS	<u>0.02</u>	<u>0.02</u>	<u>21</u>	<u>21</u>	
F-1	H <sub>2</sub> S Plant Fugitives (8)	VOC	<u>&lt; 0.01</u>	<u>0.02</u>	<u>3, 30, 33</u>	<u>3, 5, 30, 33</u>	<u>3</u>
		H <sub>2</sub> S	<u>&lt; 0.01</u>	<u>&lt; 0.01</u>	<u>33</u>	<u>5, 33</u>	
		TRS	<u>&lt; 0.01</u>	<u>0.02</u>	<u>33</u>	<u>5, 33</u>	
BMT-1M	Train 1 – MeSH Production Fugitives (8)	VOC	<u>0.19</u>	<u>0.85</u>	<u>3, 30, 33</u>	<u>3, 5, 30, 33</u>	<u>3</u>
		H <sub>2</sub> S	<u>0.02</u>	<u>0.07</u>	<u>33</u>	<u>5, 33</u>	
		TRS	<u>0.16</u>	<u>0.72</u>	<u>33</u>	<u>5, 33</u>	
BMT-2M	Train 2 – MeSH Production Fugitives (8)	VOC	<u>0.06</u>	<u>0.25</u>	<u>3, 30, 33</u>	<u>3, 5, 30, 33</u>	<u>3</u>
		H <sub>2</sub> S	<u>0.02</u>	<u>0.10</u>	<u>33</u>	<u>5, 33</u>	
		TRS	<u>0.04</u>	<u>0.17</u>	<u>33</u>	<u>5, 33</u>	
ACRO-Fug	Acrolein Process Fugitives (8)	VOC	<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>
		H <sub>2</sub> S	<u>&lt; 0.01</u>	<u>&lt; 0.01</u>	<u>31, 32</u>	<u>31, 32</u>	
		TRS	<u>&lt; 0.01</u>	<u>&lt; 0.01</u>	<u>31, 32</u>	<u>31, 32</u>	
MMP-Fug	MMP Process Area Fugitives (8)	VOC	<u>0.17</u>	<u>0.73</u>	<u>3, 33</u>	<u>3, 5, 33</u>	<u>3</u>
		TRS	<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, <del>43</del> <u>49</u>	3, 18, <del>43</del> <u>49</u>	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, <del>43</del> <u>49</u>	3, 18, <del>43</del> <u>49</u>	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: <del>November 6, 2019</del> <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
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	
		<del>H<sub>2</sub>S</del>	24.08	2.82	11	5, 11	
		<del>H<sub>2</sub>SO<sub>4</sub></del>	7.21	31.57	11	5, 11	
		<del>H<sub>2</sub>SO<sub>4</sub></del> (5)	29.18		11	5, 11	
		NOx	22.56	8.67	11	5, 11	
		<del>SO<sub>2</sub></del>	625.00	448.96	11	5, 13, 11	
		<del>SO<sub>2</sub></del> (5)	3065.51		11	5, 13, 11	
		TRS	<del>37.52</del> <u>37.87</u>	8.84	11, <del>34</del> <u>34</u>	5, 11, <del>34</del> <u>34</u>	
		TRS (5)	92.52		11, <del>34</del> <u>34</u>	5, 11, <del>34</del> <u>34</u>	
		VOC	49.38	6.63	3, 11, <del>34</del> <u>34</u>	3, 5, 13, 11, <del>34</del> <u>34</u>	3
VOC (5)	70.32	3, 11, <del>34</del> <u>34</u>	3, 5, 13, 11, <del>34</del> <u>34</u>		3		
<u>H401/H402</u>	<u>Sulfur Heater 401 &amp; 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>PM<sub>10</sub></u>	<u>0.11</u>	<u>0.52</u>			
		<u>PM<sub>2.5</sub></u>	<u>0.11</u>	<u>0.52</u>			
		<u>SO<sub>2</sub></u>	<u>0.01</u>	<u>0.05</u>	<u>8.3</u>	<u>8.3</u>	<u>3</u>
<u>H501/H502</u>	<u>Sulfur Heater 501 &amp; 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: <del>November 6, 2019</del> <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>PM<sub>10</sub></u>	<u>0.11</u>	<u>0.52</u>			
		<u>PM<sub>2.5</sub></u>	<u>0.11</u>	<u>0.52</u>			
		<u>SO<sub>2</sub></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>SULFOX-CT</u>	<u>Sulfox Cooling Tower</u>	<u>PM</u>	<u>0.04</u>	<u>0.18</u>			
		<u>PM<sub>10</sub></u>	<u>0.04</u>	<u>0.18</u>			
		<u>PM<sub>2.5</sub></u>	<u>0.04</u>	<u>0.18</u>			
		<u>VOC</u>	<u>0.43</u>	<u>1.89</u>	<u>3, 26</u>	<u>3, 26</u>	<u>3</u>
<u>SULFOX-INH</u>	<u>Bag Filter</u>	<u>PM</u>	<u>0.08</u>	<u>0.01</u>			
		<u>PM<sub>10</sub></u>	<u>0.08</u>	<u>0.01</u>			
		<u>PM<sub>2.5</sub></u>	<u>0.08</u>	<u>0.01</u>			
<u>BMT-1E/T</u>	<u>Train 1 – EtSH or TBM Production Fugitives (8)</u>	<u>VOC</u>	<u>0.07</u>	<u>0.31</u>	<u>3, 30, 33</u>	<u>3, 5, 30, 33</u>	<u>3</u>
		<u>H<sub>2</sub>S</u>	<u>&lt; 0.01</u>	<u>0.01</u>	<u>33</u>	<u>5, 33</u>	
		<u>TRS</u>	<u>&lt; 0.01</u>	<u>0.01</u>	<u>33</u>	<u>5, 33</u>	
<u>STORAGE</u>	<u>Storage Tanks Fugitives (8)</u>	<u>VOC</u>	<u>0.21</u>	<u>0.93</u>	<u>3, 30, 33, 49</u>	<u>3, 5, 30, 33, 49</u>	<u>3, 49</u>
		<u>TRS</u>	<u>0.18</u>	<u>0.80</u>	<u>33, 49</u>	<u>5, 33, 49</u>	<u>49</u>
<u>SulfoxChlr</u>	<u>Sulfox Chiller System (8)</u>	<u>HCFC</u>	<u>0.01</u>	<u>0.01</u>	<u>3</u>	<u>3</u>	<u>3</u>
H202	Heat Transfer Fluid Heater (31 MMBtu/hr)	CO	2.59	11.32			
		NOx	3.08	13.48	3	3	3
		<del>PM/PM<sub>2.5</sub>/PM<sub>10</sub></del>	0.23	1.02			
		<u>PM<sub>10</sub></u>	<u>0.23</u>	<u>1.02</u>			
		<u>PM<sub>2.5</sub></u>	<u>0.23</u>	<u>1.02</u>			
		<u>SO<sub>2</sub>SO<sub>2</sub></u>	0.02	0.08	8, 3	8, 3	3
		VOC	0.17	0.74			

Permit Numbers: 865A and PSDTX1016M1					Issuance Date: <del>November 6, 2019</del> <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
H401/H402	Sulfur Heater 401 & Methane Heater 402 (7)	CO	4.32	5.77			
		NOx	4.64	7.04	3	3	3
		PM/PM2.5/PM10	0.11	0.52			
		SO2	0.04	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
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	4.57	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-4	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	

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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: <del>November 6, 2019</del> <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
		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 <sub>10</sub>	0.01	0.03	28	28	
		PM <sub>2.5</sub>	<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 <sub>2</sub> 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 <sub>2</sub> 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 <sub>2</sub> S	0.04	0.04	30	5, 30	
		TRS	0.04	0.04	30	5, 30	
		VOC	0.07	0.31	3, 27, 30	3, 5, 27, 30	3
BMT-1M	Train 1 – MeSH Production Fugitives (8)	H <sub>2</sub> 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 <sub>2</sub> 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 <sub>2</sub> S Plant Process Fugitives (8)	H <sub>2</sub> S	0.04	0.04	30	5, 30	
		TRS	0.04	0.02	30	5, 30	

Permit Numbers: 865A and PSDTX1016M1					Issuance Date: <del>November 6, 2019</del> <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
		VOC	0.04	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	0.04	0.04	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<sub>x</sub> – total oxides of nitrogen
  - PM – total particulate matter, suspended in the atmosphere, including PM<sub>10</sub> and PM<sub>2.5</sub>
  - PM<sub>10</sub> – particulate matter equal to or less than 10 microns in diameter, including PM<sub>2.5</sub>
  - PM<sub>2.5</sub> – particulate matter equal to or less than 2.5 microns in diameter
  - SO<sub>2</sub> – sulfur dioxide
  - VOC – volatile organic compounds as defined in Title 30 Texas Administrative Code 101.1
  - NaOH – sodium hydroxide
  - H<sub>2</sub>SO<sub>4</sub> – sulfuric acid
  - H<sub>2</sub>S – hydrogen sulfide
  - TRS – total reduced sulfur, includes H<sub>2</sub>S and sulfur bearing VOC, excludes SO<sub>2</sub>
  - 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.