

Texas Commission on Environmental Quality

Title V Existing

1373

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	BAYPORT EO PLANT
Does the site have a physical address?	Yes
Physical Address	
Number and Street	5761 UNDERWOOD RD
City	PASADENA
State	TX
ZIP	77507
County	HARRIS
Latitude (N) (##.#####)	29.628611
Longitude (W) (-###.#####)	95.086111
Primary SIC Code	2860
Secondary SIC Code	
Primary NAICS Code	325199
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN102926920
What is the name of the Regulated Entity (RE)?	BAYPORT EO PLANT
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	5761 UNDERWOOD RD
City	PASADENA
State	TX
ZIP	77507
County	HARRIS
Latitude (N) (##.#####)	29.634722
Longitude (W) (-###.#####)	-95.086111
Facility NAICS Code	
What is the primary business of this entity?	INDUSTRIAL CHEMICAL MANUFACTURING PLANT

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN602805236
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	INEOS Americas LLC
Texas SOS Filing Number	800318204
Federal Tax ID	721383712
State Franchise Tax ID	17213837127

State Sales Tax ID	
Local Tax ID	
DUNS Number	9356563
Number of Employees	501+
Independently Owned and Operated?	Yes

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	INEOS USA LLC
Prefix	MR
First	KEVIN
Middle	
Last	MCGOVERN
Suffix	
Credentials	
Title	SITE MANAGER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	5761 UNDERWOOD RD
Routing (such as Mail Code, Dept., or Attn:)	
City	PASADENA
State	TX
ZIP	77507
Phone (###-###-####)	2815354228
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	kevin.mcgovern@ineos.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	INEOS Americas LLC
Prefix	MR
First	Robert
Middle	Malcolm
Last	Vogel
Suffix	
Credentials	
Title	Environmental Engineer
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic

Mailing Address (include Suite or Bldg. here, if applicable)	5761 UNDERWOOD RD
Routing (such as Mail Code, Dept., or Attn:)	
City	PASADENA
State	TX
ZIP	77507
Phone (###-###-####)	2258928296
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	robert.vogel@ineos.com

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	29 Deg 37 Min 43 Sec
3) Permit Longitude Coordinate:	95 Deg 5 Min 10 Sec
4) Is this submittal a new application or an update to an existing application?	New Application
4.1. What type of permitting action are you applying for?	Streamlined Revision
4.1.1. Are there any permits that should be voided upon issuance of this permit application through permit conversion?	No
4.1.2. Are there any permits that should be voided upon issuance of this permit application through permit consolidation?	No
5) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)	
[File Properties]	
File Name	OP_1_INEOS Title V Minor Revision 2025-0821.pdf
Hash	CDEBEFAE669BC02562848CFF0E49F3D72B9C4FD9A87D7D9A089AE5792628C80F
MIME-Type	application/pdf

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-PBR SUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

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

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach any other necessary information needed to complete the permit.

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

Expedite Title V

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

No

Certification

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

1. I am Kevin Mcgovern, the owner of the STEERS account ER104838.
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 1373.
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: Kevin Mcgovern OWNER OPERATOR

Account Number: ER104838

Signature IP Address: 155.190.8.7

Signature Date: 2025-08-28

Signature Hash: F7925D35166504480DF83CD9D0345290F8E71BD5184B230DE7CC843A195FBC51

Form Hash Code at time of Signature: 047253EC57231726248A6BF3F776AD8D97FB9E35D6A4FF4837102AB103E97B8A

Submission

Reference Number:

The application reference number is 812827

Submitted by:

The application was submitted by
ER104838/Kevin McGovern

Submitted Timestamp:

The application was submitted on 2025-08-28
at 16:05:57 CDT

Submitted From:

The application was submitted from IP address
155.190.8.7

Confirmation Number:

The confirmation number is 674664

Steers Version:

The STEERS version is 6.92

Permit Number:

The permit number is 1373

Additional Information

Application Creator: This account was created by Robert M Vogel

STREAMLINED MINOR REVISION APPLICATION

Site Operating Permit 01373

**INEOS AMERICAS LLC
Bayport EO Plant
CN602805236
RN102926920**

Prepared By:

Hao Zhang – Managing Consultant
Lillian Rodriguez - Consultant

TRINITY CONSULTANTS

1800 West Loop South
Suite 1000
Houston, TX 77027
(713) 552-1371

August 2025

Project 254402.0375



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1. PROJECT INFORMATION

INEOS AMERICAS LLC owns and operates an Ethylene Oxide plant (Bayport EO Plant), located in the Bayport Industrial Park at 5761 Underwood Road in Pasadena, Harris County, Texas. Facilities at the site are operated under Site Operating Permit (SOP) O1373. The Bayport EO Plant has been assigned TCEQ Air Quality Account No. HG-1996-R. The purpose of this application is to implement a minor revision to the SOP.

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

- ▶ Per Compliance Schedule regarding Unit ID PAINTAREA, INEOS is submitting this Title V permit revision application to update applicable requirement of the painting and surface coating operations to comply with 30 TAC Chapter 115 requirement, including:
 - Removing existing permit shield for 30 TAC Chapter 115, Surface Coating Operations
 - Adding applicable requirement under 30 TAC Chapter 115, Surface Coating Operations
 - Removing existing exemption under 30 TAC Chapter 115, Subchapter E, Division 5
 - Including negative applicability of 30 TAC Chapter 115, Subchapter E, Division 5 for documentation purposes only
 - ◆ INEOS will request addition of permit shield for 30 TAC Chapter 115, Subchapter E, Division 5 in the next renewal/significant revision application.
- ▶ In addition, INEOS is requesting removal of the aforementioned Compliance Schedule upon approval of this permit revision application.

2. ADMINISTRATIVE FORMS

This section contains the following forms and information:

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

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

Date: 8/21/2025	
Permit No.: O1373	
Regulated Entity No.: RN102926920	
Company Name: INEOS AMERICAS LLC	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
I. Application Type	
Indicate the type of application:	
<input type="checkbox"/> Renewal	
<input checked="" type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
<input type="checkbox"/> Significant Revision	
<input type="checkbox"/> Revision Requesting Prior Approval	
<input type="checkbox"/> Administrative Revision	
<input type="checkbox"/> Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
For GOP Revisions Only	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)
Indicate all pollutants for which the site is a major source based on the site's potential to emit: <i>(Check the appropriate box[es].)</i>
<input checked="" type="checkbox"/> VOC <input checked="" type="checkbox"/> NO _x <input type="checkbox"/> SO ₂ <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> CO <input type="checkbox"/> Pb <input checked="" type="checkbox"/> HAP
Other:
IV. Reference Only Requirements (For reference only)
Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
V. Delinquent Fees and Penalties
Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.

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

Date: 8/21/2025
Permit No.: O1373
Regulated Entity No.: RN102926920
Company Name: INEOS AMERICAS LLC

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

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
1	MS-C	NO	PAINTAREA	OP-REQ2	106.433/09/04/2000[113031]	Remove current permit shield for 30 TAC Chapter 115, Surface Coating Operations
2	MS-C	NO	PAINTAREA	OP-REQ3 OP-UA18	106.433/09/04/2000[113031]	Add applicable 30 TAC Chapter 115, Surface Coating Operations requirements.
3	MS-C	NO	PAINTAREA	OP-REQ3	106.433/09/04/2000[113031]	Remove §115.451(a)(3) exemption.
		NO	PAINTAREA	OP-REQ2	106.433/09/04/2000[113031]	The Bayport EO Plant is not subject to 30 TAC Chapter 115, Subchapter E, Division 5. However, INEOS is not requesting a permit shield to be added as part of this application.

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

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

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

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

Pollutant	Description of the Change in Pollutant Emissions

Table 1

[illegible]

3. UNIT ATTRIBUTE FORMS

This section contains the following Unit Attribute Forms:

- ▶ OP-UA18 – Surface Coating Operations Attributes

**Surface Coating Operations Attributes
Form OP-UA18
Federal Operating Permit Program
Texas Commission on Environmental Quality**

General Information

Requested Information	Response
Date:	08/21/2025
Customer Reference No.:	CN602805236
Regulated Entity No.:	RN102926920
Permit No.:	O1373
Permit Area Name:	Bayport EO Plant
Permit Type:	SOP
Project Type:	Revision
Submission Type:	Existing Application Update
Project Number (if available):	
Form Information	TCEQ Entry Only
Title V Form Release Date:	11/2013
Form Number:	10024
APD ID Number:	53v1.0
Version Revised Date:	07/2025
	This form is for use by facilities subject to air quality permit requirements and may be revised periodically.

Table 8a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter E, Division 2: Surface Coating Processes

Process ID No.	SOP Index No.	Alternative Compliance Method (ACM)	ACM ID No.	Facility Operations	Maintenance Shop	VOC Emission Rate	Vapor Recovery	Control Device ID No.
PAINTAREA	115E-3	NO		MISM	2012-	OTHER	NONE	

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Surface Coating Operations Attributes
Form OP-UA18
Federal Operating Permit Program
Texas Commission on Environmental Quality

Table 8b: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter E, Division 2: Surface Coating Processes

Process ID No.	SOP Index No.	Alternative Requirements (AR)	AR ID No.	Miscellaneous Coating Type	Vehicle Refinishing Coating Type	Mirror Backing	Wood Coating Type
PAINTAREA	115E-3	NO		BAKE			

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4. APPLICABLE REQUIREMENTS SUMMARY FORMS

This section contains the following forms and information:

- ▶ Form OP-REQ1 – Application Area-Wide Applicability Determinations and General Information
- ▶ Form OP-REQ2 – Negative Applicable Requirements 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.
08/21/2025	O1373	RN102926920

For SOP applications, answer ALL questions unless otherwise directed.

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

XII. NSR Authorizations (Attach additional sheets if necessary for sections XII.E-J.)

E. PSD Permits and PSD Major Pollutants

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

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

F. Nonattainment (NA) Permits and NA Major Pollutants

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

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
6257E	06/24/2025				
6357F	01/04/2024				
83663	09/14/2020				
157440	08/21/2019				

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.
08/21/2025	O1373	RN102926920

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

- ◆ **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
15	05/12/1981	106.371	09/04/2000	106.478	09/04/2000
51	11/05/1986	106.373	09/04/2000	106.511	09/04/2000
53	11/05/1986	106.412	09/04/2000	106.512	06/13/2001
106.261	11/01/2003	106.433	09/04/2000	106.532	09/04/2000
106.262	11/01/2003	106.452	09/04/2000		
106.263	11/01/2001	106.454	09/04/2000		
106.264	09/04/2000	106.472	09/04/2000		
106.265	09/04/2000	106.473	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

**Surface Coating Operations Attributes
Federal Operating Permit Program
Texas Commission on Environmental Quality**

Form OP-REQ2 - Negative Applicable/Superseded Requirement Determinations

[illegible]

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

Table 1a: Additions

Date: 08/21/2025	Regulated Entity No.: RN102926920	Permit No.: O1373
Company Name: INEOS AMERICAS LLC	Area Name: Bayport EO Plant	

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	PAINTAREA	OP-UA18	115E-3	VOC	30 TAC Chapter 115, Surface Coating Operations	§115.421(8)(A) 5 [R]§115.421 [R]§115.421(8)(B) [R]§115.421(8)(C) [R]§115.426

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

Table 1b: Additions

Date: 08/21/2025	Regulated Entity No.: RN102926920	Permit No.: O1373
Company Name: INEOS AMERICAS LLC	Area Name: Bayport EO Plant	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	PAINTAREA	115E-3	VOC	[R]§115.424(a) [R]§115.424(b) [GR]§115.425(1) [R]§115.425(6) [GR]§115.426(1)	[R]§115.426 [GR]§115.426(1)	NONE

**Applicable Requirements Summary
Form OP-REQ3 (Page 3)
Federal Operating Permit Program**

Table 2a: Deletions

Date: 08/21/2025	Regulated Entity No.: RN102926920	Permit No.: O1373
Company Name: INEOS AMERICAS LLC	Area Name: Bayport EO Plant	

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)
3	PAINTAREA	OP-REQ3	115E-2	VOC	30 TAC Chapter 115, Subchapter E, Division 5	§ 115.451(a)(1) § 115.453(e) § 115.453(e)(1)

**Applicable Requirements Summary
Form OP-REQ3 (Page 4)
Federal Operating Permit Program
Table 2b: Deletions**

Date: 08/21/2025	Regulated Entity No.: RN102926920	Permit No.: O1373
Company Name: INEOS AMERICAS LLC	Area Name: Bayport EO Plant	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
3	PAINTAREA	OP-REQ2	115E-2	VOC	NONE	§ 115.458(b)(1) § 115.458(b)(2) § 115.458(b)(5) § 115.458(b)(7)	§ 115.453(e)(2)