

Celanese Ltd.
P.O. Box 509
Bay City, TX 77404-0509



*Submitted Electronically via
State of Texas Environmental Electronic Reporting System (STEERS)*

August 22, 2025

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

**Re: Site Operating Permit No. O1628 Minor Revision Application
Celanese Ltd., Bay City Plant
Customer Reference Number: CN600130850
Regulated Entity Number: RN100258060**

To Whom It May Concern:

Celanese Ltd., Bay City Plant (Celanese) is submitting a revision to Site Operating Permit No. O1628. This minor permit revision meets the criteria outlined in 30 TAC §122.215 and the application includes all the information required by 30 TAC §122.216.

Celanese seeks to update the following in the Title V Permit:

- 1) Incorporate renewed and amended New Source Review (NSR) Permit No. 4449 (TCEQ Project 371017) issued on 8/8/25 into Title V Permit O1628; and
- 2) Incorporate amended NSR Permit No. 4196 (TCEQ Project 375576) issued on 4/25/25 into Title V Permit O1628.

There are no regulatory changes associated with these NSR actions. The following forms are included in this submittal:

- OP-2: Application for Permit Revision/Renewal; and
- OP-REQ1: Application Area-Wide Applicability, Page 89.

If you have any questions about this submittal, please contact me at (979) 216-0375 or via email at jennifer.ashcraft@celanese.com.

Sincerely,

Jennifer Ashcraft
Environmental Manager
Celanese Ltd. Bay City Plant

Attachments

cc: Air Section Manager, TCEQ Region 12, 5425 Polk St, Ste H, Houston TX 77023-1452
Electronic Submittal to R12APDMail@tceq.texas.gov

EPA Region 6
Electronic Submittal to R6AirPermitsTX@epa.gov

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

| | | | |
|--|--------------------------------|--|---|
| Date: | August 2025 | | |
| Permit No.: | O1628 | | |
| Regulated Entity No.: | RN100258060 | | |
| Company / Area Name: | Celanese Ltd. / Bay City Plant | | |
| For Submissions to EPA | | | |
| Has a 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 a change in regulations.) | | | | | | | |
| Indicate all pollutants for which the site is a major source based on the site's potential to emit after the change is operated: | | | | | | | |
| <input checked="" type="checkbox"/> | VOC | <input 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 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: | August 2025 |
| Permit No.: | O1628 |
| Regulated Entity No.: | RN100258060 |
| Company / Area Name: | Celanese Ltd. |

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

| Revision No. | Revision Code | Unit/Group/Process | | | NSR Authorization | Description of Changes and Provisional Terms and Conditions |
|--------------|---------------|--------------------|----------|-----------------|-------------------|---|
| | | New Unit | ID No. | Applicable Form | | |
| 1 | MS-A | No | Sitewide | OP-REQ1 | 4449 | Incorporate NSR Permit 4449 Renewal / Amendment (TCEQ Project 371017) into Title V Permit O1628. There are no regulatory applicability changes associated with this change. |
| 2 | MS-A | No | Sitewide | OP-REQ1 | 4196 | Incorporate NSR Permit 4196 Amendment (TCEQ Project 375576) issued on 4/25/25 into Title V Permit O1628. There are no regulatory applicability changes associated with this change. |
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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. |
|-------------|------------|----------------------|
| August 2025 | O1628 | RN100258060 |

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 |
|-------------------|---------------|-------------------|---------------|-------------------|---------------|
| 4449 | 08/08/2025 | | | | |
| 4196 | 04/25/2025 | | | | |
| | | | | | |
| | | | | | |

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

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

| PBR No. | Version No./Date | PBR No. | Version No./Date | PBR No. | Version No./Date |
|---------|------------------|---------|------------------|---------|------------------|
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- ◆ **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 |
|------------|---------------|------------|---------------|------------|---------------|
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Texas Commission on Environmental Quality

Title V Existing

1628

Site Information (Regulated Entity)

| | |
|---|-------------------------|
| What is the name of the permit area to be authorized? | BAY CITY PLANT |
| Does the site have a physical address? | Yes |
| Physical Address | |
| Number and Street | 2001 FM 3057 |
| City | BAY CITY |
| State | TX |
| ZIP | 77414 |
| County | MATAGORDA |
| Latitude (N) (##.#####) | 28.861666 |
| Longitude (W) (-###.#####) | 96.019444 |
| 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)? | RN100258060 |
| What is the name of the Regulated Entity (RE)? | CELANESE BAY CITY PLANT |
| Does the RE site have a physical address? | Yes |
| Physical Address | |
| Number and Street | 2001 FM 3057 |
| City | BAY CITY |
| State | TX |
| ZIP | 77414 |
| County | MATAGORDA |
| Latitude (N) (##.#####) | 28.5142 |
| Longitude (W) (-###.#####) | -96.011 |
| Facility NAICS Code | |
| What is the primary business of this entity? | ORGANIC CHEMICALS MNFG |

Customer (Applicant) Information

| | |
|--|----------------|
| How is this applicant associated with this site? | Owner Operator |
| What is the applicant's Customer Number (CN)? | CN600130850 |
| Type of Customer | Partnership |
| Full legal name of the applicant: | |
| Legal Name | Celanese Ltd. |
| Texas SOS Filing Number | 8495110 |
| Federal Tax ID | 752622526 |
| State Franchise Tax ID | 17526225267 |
| State Sales Tax ID | |
| Local Tax ID | |
| DUNS Number | 26040709 |
| Number of Employees | |
| Independently Owned and Operated? | Yes |

Responsible Official Contact

| | |
|--|---------------------|
| Person TCEQ should contact for questions about this application: | |
| Organization Name | CELANESE LTD |
| Prefix | MR |
| First | DONALD |
| Middle | |
| Last | BERTHELOT |
| Suffix | |
| Credentials | |
| Title | DIRECTOR PRODUCTION |
| Enter new address or copy one from list: | |
| Mailing Address | |
| Address Type | Domestic |
| Mailing Address (include Suite or Bldg. here, if applicable) | PO BOX 509 |
| Routing (such as Mail Code, Dept., or Attn:) | |
| City | BAY CITY |
| State | TX |
| ZIP | 77404 |

| | |
|--------------------------------|-------------------------------|
| Phone (###-###-####) | 9792160314 |
| Extension | |
| Alternate Phone (###-###-####) | |
| Fax (###-###-####) | 9792160381 |
| E-mail | donald.berthelot@celanese.com |

Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application

Select existing DAR contact or enter a new contact.

New Contact

Organization Name

CELANESE LTD

Prefix

MS

First

Jennifer

Middle

Last

Ashcraft

Suffix

Credentials

Title

Environmental 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 509

Routing (such as Mail Code, Dept., or Attn:)

City

BAY CITY

State

TX

Zip

77404

Phone (###-###-####)

9792160375

Extension

Alternate Phone (###-###-####)

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

9792160383

E-mail

Jennifer.Ashcraft@celanese.com

Technical Contact

Person TCEQ should contact for questions about this application:

| | |
|--|-------------------------------------|
| Select existing TC contact or enter a new contact. | JENNIFER ASHCRAFT(CELANESE LTD...) |
| Organization Name | CELANESE LTD |
| Prefix | MS |
| First | JENNIFER |
| Middle | |
| Last | ASHCRAFT |
| Suffix | |
| Credentials | |
| Title | ENVIRONMENTAL 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 509 |
| Routing (such as Mail Code, Dept., or Attn:) | |
| City | BAY CITY |
| State | TX |
| ZIP | 77404 |
| Phone (###-###-####) | 9792160375 |
| Extension | |
| Alternate Phone (###-###-####) | |
| Fax (###-###-####) | 9792160381 |
| E-mail | jennifer.ashcraft@celanese.com |

Title V General Information - Existing

| | |
|---|--------------------------------|
| 1) Permit Type: | SOP |
| 2) Permit Latitude Coordinate: | 28 Deg 51 Min 42 Sec |
| 3) Permit Longitude Coordinate: | 96 Deg 1 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) Who will electronically sign this Title V application? | Duly Authorized Representative |

6) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?

N/A

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

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

[File Properties]

File Name

[OP-2.pdf](/ePermitsExternal/faces/file?fileId=277281)

Hash

4661529975A5E1D707377927F15A97303D0673519D304F28B3A4C3F44AC941C3

MIME-Type

application/pdf

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

[File Properties]

File Name

[OP-REQ1.pdf](/ePermitsExternal/faces/file?fileId=277282)

Hash

4103AFCDF9599411FF1F04C3774CDB8EE09739DB2A28F080726E5AE1F5BB6A31

MIME-Type

application/pdf

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

Celanese
O1628 Minor Revision.pdf

Hash

098C14A954B22DE4C4B820D19B2CFC3E271F222A342FFB4F7A41875E3F6BBF47

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 Duly Authorized Representative 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 Donald A Berthelot, the owner of the STEERS account ER084362.
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 1628.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEQ.

OWNER OPERATOR Signature: Donald A Berthelot OWNER OPERATOR

Account Number:

ER084362

Signature IP Address:

170.85.11.14

Signature Date:

2025-08-28

Signature Hash:

265670ECD9D3D5D9187F34A82840A2303E2F1249B964BDCF4BFAD9EF89F3192A

Form Hash Code at time of Signature:

A000FD8EC5A2B5D8C0399BF8BF3D4816AC02B705DAE69735005F5C4B28C8D13B

Submission

Reference Number:

The application reference number is 811090

Submitted by:

The application was submitted by ER084362/Donald A Berthelot

Submitted Timestamp:

The application was submitted on 2025-08-28 at 17:17:26 CDT

Submitted From:

The application was submitted from IP address 170.85.102.81

Confirmation Number:

The confirmation number is 674687

Steers Version:

The STEERS version is 6.92

Permit Number:

The permit number is 1628

Additional Information

Application Creator: This account was created by Meenu Pillai

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

| | | | |
|--|--------------------------------|--|---|
| Date: | August 2025 | | |
| Permit No.: | O1628 | | |
| Regulated Entity No.: | RN100258060 | | |
| Company / Area Name: | Celanese Ltd. / Bay City Plant | | |
| For Submissions to EPA | | | |
| Has a 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 a change in regulations.) | | | | | | | |
| Indicate all pollutants for which the site is a major source based on the site's potential to emit after the change is operated: | | | | | | | |
| <input checked="" type="checkbox"/> | VOC | <input 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 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: | August 2025 |
| Permit No.: | O1628 |
| Regulated Entity No.: | RN100258060 |
| Company / Area Name: | Celanese Ltd. |

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

| Revision No. | Revision Code | Unit/Group/Process | | | NSR Authorization | Description of Changes and Provisional Terms and Conditions |
|--------------|---------------|--------------------|----------|-----------------|-------------------|---|
| | | New Unit | ID No. | Applicable Form | | |
| 1 | MS-A | No | Sitewide | OP-REQ1 | 4449 | Incorporate NSR Permit 4449 Renewal / Amendment (TCEQ Project 371017) into Title V Permit O1628. There are no regulatory applicability changes associated with this change. |
| 2 | MS-A | No | Sitewide | OP-REQ1 | 4196 | Incorporate NSR Permit 4196 Amendment (TCEQ Project 375576) issued on 4/25/25 into Title V Permit O1628. There are no regulatory applicability changes associated with this change. |
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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. |
|-------------|------------|----------------------|
| August 2025 | O1628 | RN100258060 |

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 |
|-------------------|---------------|-------------------|---------------|-------------------|---------------|
| 4449 | 08/08/2025 | | | | |
| 4196 | 04/25/2025 | | | | |
| | | | | | |
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- ◆ **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 |
|---------|------------------|---------|------------------|---------|------------------|
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- ◆ **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 |
|------------|---------------|------------|---------------|------------|---------------|
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