

Texas Commission on Environmental Quality

Title V Existing

2285

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	SPECIALTIES UNIT
Does the site have a physical address?	Yes
Physical Address	
Number and Street	2500 N SOUTH ST
City	PASADENA
State	TX
ZIP	77503
County	HARRIS
Latitude (N) (##.#####)	29.738888
Longitude (W) (-###.#####)	95.168055
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)?	RN100218247
What is the name of the Regulated Entity (RE)?	KETJEN PASADENA PLANT
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	2500 N SOUTH ST
City	PASADENA
State	TX
ZIP	77503
County	HARRIS
Latitude (N) (##.#####)	29.738888
Longitude (W) (-###.#####)	-95.168055
Facility NAICS Code	
What is the primary business of this entity?	INDUSTRIAL CHEMICAL MFG

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN606211746
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Ketjen Limited Liability Company
Texas SOS Filing Number	804803653
Federal Tax ID	884253232
State Franchise Tax ID	32087070283
State Sales Tax ID	
Local Tax ID	
DUNS Number	119071852
Number of Employees	501+
Independently Owned and Operated?	No

Responsible Official Contact

Person TCEQ should contact for questions about this application:	
Organization Name	Ketjen Limited Liability Company
Prefix	MS
First	Lisa
Middle	
Last	Frugé
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 2500
Routing (such as Mail Code, Dept., or Attn:)	
City	PASADENA
State	TX
ZIP	77501

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

7137401166

Extension

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

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

E-mail

lisa.fruge@ketjen.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

CHRIS ARCENEUX(KETJEN LIMITED ...)

Organization Name

KETJEN LIMITED LIABILITY COMPANY

Prefix

MR

First

CHRIS

Middle

Last

ARCENEUX

Suffix

Credentials

Title

ENVIRONMENTAL PROFESSIONAL

Enter new address or copy one from list:

Mailing Address

Address Type

Domestic

Mailing Address (include Suite or Bldg. here, if applicable)

PO BOX 2500

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

City

PASADENA

State

TX

ZIP

77501

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

7137401160

Extension

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

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

E-mail

Chris.Arceneaux@Ketjen.com

Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

29 Deg 44 Min 20 Sec

3) Permit Longitude Coordinate:	95 Deg 10 Min 5 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

Ketjen
Title V O2285 Revision 2025-0916 signed.pdf

Hash

3E5FB61D0822A3AA9CA232D9CA4CD621A140044861EB08FF03195AD5FBB58A7C

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 Lisa Fruge, the owner of the STEERS account ER068673.
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 2285.
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: Lisa Fruge OWNER OPERATOR

Account Number:

ER068673

Signature IP Address:

12.196.187.18

Signature Date:

2025-09-17

Signature Hash:

61AFA8E28B9CC64E46F35915D8A98F82C63368924F23EB8DFC6A19EF4EDD6445

Form Hash Code at time of Signature:

49AD80A99F08BAC3771C4658DDDFC6FB7071AAADC223DE32CF28C4D1BCF7F0AA

Submission

Reference Number:

The application reference number is 818038

Submitted by:

The application was submitted by ER068673/Lisa Fruge

Submitted Timestamp:

The application was submitted on 2025-09-17 at 12:48:48 CDT

Submitted From:

The application was submitted from IP address 12.196.187.18

Confirmation Number:

The confirmation number is 678772

Steers Version:

The STEERS version is 6.92

Permit Number:

The permit number is 2285

Additional Information

Application Creator: This account was created by Chris A Arceneaux

September 16, 2025

Submitted via STEERS

Subject: Title V Revision
Title V Permit No. O-2285
Ketjen Pasadena Plant
CN606211746, RN100218247

To Whom it May Concern:

As required by 30 TAC §122.211, Ketjen submits this Title V Minor Permit Revision Application for FOP O-2285. The following changes are being requested:

1. Adding sitewide applicability to 40 CFR 61 Subpart FF (BWON).
2. Updating applicability for 30 TAC Chapter 115, Subchapter H (HRVOC vents).

Ketjen is requesting this revision as part of a corrective action for an internal audit performed under the Texas Audit Privilege Act (Investigation No. 19233367). The following forms are being submitted via STEERS: OP-2, OP-REQ1 (page 30), OP-UA15, and OP-REQ3.

If you need any additional information, please contact me at 713-740-1160 or by email at Chris.Arceneaux@ketjen.com.

Sincerely,

Ketjen LLC



Chris Arceneaux
Environmental Professional

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

Date: 9/16/2025	
Permit No.: O-2285	
Regulated Entity No.: RN100218247	
Company Name: Ketjen LLC	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? ☒ YES ☐ NO	
I. Application Type	
Indicate the type of application:	
☐ Renewal	
☒ Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
☐ Significant Revision	
☐ Revision Requesting Prior Approval	
☐ Administrative Revision	
☐ Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only ☒ YES ☐ NO	
For GOP Revisions Only ☐ YES ☐ 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:
(Check the appropriate box[es].)

☒ VOC ☒ NO_x ☐ SO₂ ☐ PM₁₀ ☒ CO ☐ Pb ☐ 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)? ☒ YES ☐ NO ☐ N/A

V. Delinquent Fees and Penalties

Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.

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

Date: 9/16/2025
Permit No.: O-2285
Regulated Entity No.: RN100218247
Company Name: Ketjen LLC

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	ADMIN-C	No	Sitewide	OP-REQ1		Add sitewide applicability to 40 CFR 61 Subpart FF.
2	MS-C	No	G-G-5	OP-UA15		Adding Chapter 115, Subchapter H (HRVOC) applicability.
3	MS-C	No	G-G-6	OP-UA15		Adding Chapter 115, Subchapter H (HRVOC) applicability.
4	MS-C	No	G-G-7	OP-UA15		Adding Chapter 115, Subchapter H (HRVOC) applicability.
5	MS-C	No	T-G-6	OP-UA15		Adding Chapter 115, Subchapter H (HRVOC) applicability.
6	MS-C	No	T-G-7	OP-UA15		Adding Chapter 115, Subchapter H (HRVOC) applicability.
7	MS-C	No	T-H-8	OP-UA15		Adding Chapter 115, Subchapter H (HRVOC) applicability.
8	MS-C	No	T-K-6	OP-UA15		Updating Chapter 115, Subchapter H (HRVOC) applicability.
9	MS-C	No	T-K-8	OP-UA15		Adding Chapter 115, Subchapter H (HRVOC) applicability.

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

Date: 9/16/2025	
Permit No.: O-2285	
Regulated Entity No.: RN100218247	
Company Name: Ketjen Pasadena Plant	
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? ☐ YES ☐ 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? ☐ YES ☐ 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
N/A	N/A

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 30)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
9/16/2025	O-2285	RN100218247

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

VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)	
G. Subpart BB - National Emission Standard for Benzene Emissions from Benzene Transfer Operations (continued)	
3. The application area includes benzene transfer operations at railcar loading racks.	☐ Yes ☐ No
4. The application area includes benzene transfer operations at tank-truck loading racks.	☐ Yes ☐ No
H. Subpart FF - National Emission Standard for Benzene Waste Operations	
Applicability	
1. The application area includes a chemical manufacturing plant, coke by-product recovery plant, or petroleum refinery facility as defined in § 61.341.	☒ Yes ☐ No
2. The application area is located at a hazardous waste treatment, storage, and disposal (TSD) facility site as described in 40 CFR § 61.340(b). <i>If the responses to Questions VII.H.1 and VII.H.2 are both "No," go to Section VIII.</i>	☐ Yes ☒ No
3. The application area is located at a site that has no benzene onsite in wastes, products, byproducts, or intermediates. <i>If the response to Question VII.H.3 is "Yes," go to Section VIII.</i>	☐ Yes ☒ No
4. The application area is located at a site having a total annual benzene quantity from facility waste less than 1 megagram per year (Mg/yr). <i>If the response to Question VII.H.4 is "Yes," go to Section VIII</i>	☒ Yes ☐ No
5. The application area is located at a site having a total annual benzene quantity from facility waste greater than or equal to 1 Mg/yr but less than 10 Mg/yr. <i>If the response to Question VII.H.5 is "Yes," go to Section VIII.</i>	☐ Yes ☐ No

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15
Federal Operating Permit Program
Texas Commission on Environmental Quality

Table 12a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter H, Division 1: Highly-Reactive Volatile Organic Compounds-Vent Gas Control

Emission Point ID No.	SOP Index No.	HRVOC Concentration	Max Flow Rate	Exempt Date	Vent Gas Stream Control
G-G-5	R5720-05	NO	YES	NO	
G-G-6	R5720-03	NO	NO		UNCON
G-G-7	R5720-03	NO	NO		UNCON
T-G-6	R5720-03	NO	NO		UNCON
T-G-7	R5720-03	NO	NO		UNCON
T-H-8	R5720-03	NO	NO		UNCON
T-K-6	R5720-03	NO	NO		UNCON
T-K-6	R5720-07	YES	NO		
T-K-8	R5720-06	YES	YES	NO	

[Go to the Table of Contents](#)

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15
Federal Operating Permit Program
Texas Commission on Environmental Quality

Table 12b: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter H, Division 1: Highly-Reactive Volatile Organic Compounds-Vent Gas Control

Emission Point ID No.	SOP Index No.	AM	AM ID No.	Minor Modification	Minor Modification ID No.	Process Knowledge	Waived Testing	Testing Requirements
G-G-6	R5720-03	NO		NO		YES	NO	725A
G-G-7	R5720-03	NO		NO		YES	NO	725A
T-G-6	R5720-03	NO		NO		YES	NO	725A
T-G-7	R5720-03	NO		NO		YES	NO	725A
T-H-8	R5720-03	NO		NO		YES	NO	725A
T-K-6	R5720-03	NO		NO		YES	NO	725A

[Go to the Table of Contents](#)

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

Table 1a: Additions

Date: 9/16/2025	Regulated Entity No.: RN100218247	Permit No.: O-2285
Company Name: Ketjen LLC	Area Name: Specialties Unit	

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	G-G-5	OP-UA15	R5720-05	VOC	Chapter 115	115.727(c)(2)
3	G-G-6	OP-UA15	R5720-03	VOC	Chapter 115	115.722(c)(1) 115.722(c)(3), 115.725(a)(1)(A)-(C), 115.725(a)(3), [G]115.725(a)(4), [G]115.725(l), 115.725(n), [G]115.726(a)(2)
4	G-G-7	OP-UA15	R5720-03	VOC	Chapter 115	115.722(c)(1) 115.722(c)(3), 115.725(a)(1)(A)-(C), 115.725(a)(3), [G]115.725(a)(4), [G]115.725(l), 115.725(n), [G]115.726(a)(2)
5	T-G-6	OP-UA15	R5720-03	VOC	Chapter 115	115.722(c)(1) 115.722(c)(3), 115.725(a)(1)(A)-(C), 115.725(a)(3), [G]115.725(a)(4), [G]115.725(l), 115.725(n), [G]115.726(a)(2)
6	T-G-7	OP-UA15	R5720-03	VOC	Chapter 115	115.722(c)(1) 115.722(c)(3), 115.725(a)(1)(A)-(C), 115.725(a)(3), [G]115.725(a)(4), [G]115.725(l), 115.725(n), [G]115.726(a)(2)
7	T-H-8	OP-UA15	R5720-03	VOC	Chapter 115	115.722(c)(1) 115.722(c)(3), 115.725(a)(1)(A)-(C), 115.725(a)(3), [G]115.725(a)(4), [G]115.725(l), 115.725(n), [G]115.726(a)(2)

8	T-K-6	OP-UA15	R5720-03	VOC	Chapter 115	115.722(c)(1) 115.722(c)(3), 115.725(a)(1)(A)-(C), 115.725(a)(3), [G]115.725(a)(4), [G]115.725(l), 115.725(n), [G]115.726(a)(2)
8	T-K-6	OP-UA15	R5720-07	VOC	Chapter 115	115.727(c)(2)
9	T-K-8	OP-UA15	R5720-06	VOC	Chapter 115	115.727(c)(2)

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

Table 1b: Additions

Date: 9/16/2025	Regulated Entity No.: RN100218247	Permit No.: O-2285
Company Name: Ketjen LLC	Area Name: Specialties Unit	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	G-G-5	R5720-05	VOC	None	115.726(e)(3)(A), 115.726(j)(2)	None
3	G-G-6	R5720-03	VOC	115.725(a), 115.725(a)(1)(A)-(C), 115.725(a)(3), 115.725(a)(3)(B), [G]115.725(a)(4), 115.725(a)(5),	115.726(b)(1), 115.726(b)(2)-(3), [G]115.726(h), 115.726(i) 115.726(j)(1), 115.726(j)(2)	115.725(a)(5), [G]115.725(a)(4), 115.725(n), [G]115.726(a)(2)
4	G-G-7	R5720-03	VOC	115.725(a), 115.725(a)(1)(A)-(C), 115.725(a)(3), 115.725(a)(3)(B), [G]115.725(a)(4), 115.725(a)(5),	115.726(b)(1), 115.726(b)(2)-(3), [G]115.726(h), 115.726(i) 115.726(j)(1), 115.726(j)(2)	115.725(a)(5), [G]115.725(a)(4), 115.725(n), [G]115.726(a)(2)
5	T-G-6	R5720-03	VOC	115.725(a), 115.725(a)(1)(A)-(C), 115.725(a)(3), 115.725(a)(3)(B), [G]115.725(a)(4), 115.725(a)(5),	115.726(b)(1), 115.726(b)(2)-(3), [G]115.726(h), 115.726(i) 115.726(j)(1), 115.726(j)(2)	115.725(a)(5), [G]115.725(a)(4), 115.725(n), [G]115.726(a)(2)

6	T-G-7	R5720-03	VOC	115.725(a), 115.725(a)(1)(A)-(C), 115.725(a)(3), 115.725(a)(3)(B), [G]115.725(a)(4), 115.725(a)(5),	115.726(b)(1), 115.726(b)(2)-(3), [G]115.726(h), 115.726(i) 115.726(j)(1), 115.726(j)(2)	115.725(a)(5), [G]115.725(a)(4), 115.725(n), [G]115.726(a)(2)
7	T-H-8	R5720-03	VOC	115.725(a), 115.725(a)(1)(A)-(C), 115.725(a)(3), 115.725(a)(3)(B), [G]115.725(a)(4), 115.725(a)(5),	115.726(b)(1), 115.726(b)(2)-(3), [G]115.726(h), 115.726(i) 115.726(j)(1), 115.726(j)(2)	115.725(a)(5), [G]115.725(a)(4), 115.725(n), [G]115.726(a)(2)
8	T-K-6	R5720-03	VOC	115.725(a), 115.725(a)(1)(A)-(C), 115.725(a)(3), 115.725(a)(3)(B), [G]115.725(a)(4), 115.725(a)(5),	115.726(b)(1), 115.726(b)(2)-(3), [G]115.726(h), 115.726(i) 115.726(j)(1), 115.726(j)(2)	115.725(a)(5), [G]115.725(a)(4), 115.725(n), [G]115.726(a)(2)
8	T-K-6	R5720-07	VOC	None	115.726(e)(3)(A), 115.726(j)(2)	None
9	T-K-8	R5720-06	VOC	None	115.726(e)(3)(A), 115.726(j)(2)	None