

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
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Erin E. Chancellor, *Interim Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

MR FRANK MICHAEL NEWMAN
PLANT MANAGER
OXBOW CALCINING LLC
3901 COKE DOCK RD
PORT ARTHUR TX 77640-0178

Re: Permit Renewal
Permit Number: 45622
Expiration Date:
Oxbow Calcining LLC
Petroleum Coke Calcining Plant
Port Arthur, Jefferson County
Regulated Entity Number: RN100209287
Customer Reference Number: CN602552424

Dear Mr. Newman:

Oxbow Calcining LLC has requested to renew Permit Number 45622. This letter serves as notice that your application for the above-referenced permit is technically complete as of January 6, 2023.

In accordance with Title 30 Texas Administrative Code Section 116.314(a), Permit Number 45622 is hereby renewed. Since you certified there were no changes to your existing permit, it is renewed as written and will be in effect for ten years from the date this renewal was issued. Please attach this letter and new general conditions to your permit.

If you need further information or have any questions, please contact Ms. Kristyn Jacher at (512) 239-1241 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

Enclosure

cc: Air Section Manager, Region 10 - Beaumont

Project Number: 350830

**Texas Commission on Environmental Quality
Air Quality Permit**

A Permit Is Hereby Issued To
Oxbow Calcining LLC
Authorizing the Continued Operation of
Petroleum Coke Calcining Plant
Located at Port Arthur, Jefferson County, Texas
Latitude 29.83555 Longitude -93.962704

Permit: 45622

Issuance Date: _____

Expiration Date: _____

For the Commission

1. **Facilities** covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code (TAC) Section 116.116 (30 TAC § 116.116)] ¹
2. **Voiding of Permit.** A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of the date of issuance, discontinues construction for more than 18 months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant an 18-month extension. Before the extension is granted the permit may be subject to revision based on best available control technology, lowest achievable emission rate, and netting or offsets as applicable. One additional extension of up to 18 months may be granted if the permit holder demonstrates that emissions from the facility will comply with all rules and regulations of the commission, the intent of the Texas Clean Air Act (TCAA), including protection of the public's health and physical property; and (b)(1) the permit holder is a party to litigation not of the permit holder's initiation regarding the issuance of the permit; or (b)(2) the permit holder has spent, or committed to spend, at least 10 percent of the estimated total cost of the project up to a maximum of \$5 million. A permit holder granted an extension under subsection (b)(1) of this section may receive one subsequent extension if the permit holder meets the conditions of subsection (b)(2) of this section. [30 TAC § 116.120]
3. **Construction Progress.** Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC § 116.115(b)(2)(A)]
4. **Start-up Notification.** The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program). [30 TAC § 116.115(b)(2)(B)]
5. **Sampling Requirements.** If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC § 116.115(b)(2)(C)]
6. **Equivalency of Methods.** The permit holder must demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the permit. [30 TAC § 116.115(b)(2)(D)]
7. **Recordkeeping.** The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and operating hours;

keep all required records in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction in a timely manner; comply with any additional recordkeeping requirements specified in special conditions in the permit; and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC § 116.115(b)(2)(E)]

8. **Maximum Allowable Emission Rates.** The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources-- Maximum Allowable Emission Rates." [30 TAC § 116.115(b)(2)(F)]¹
9. **Maintenance of Emission Control.** The permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. The permit holder shall provide notification in accordance with 30 TAC §101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC § 116.115(b)(2)(G)]
10. **Compliance with Rules.** Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC § 116.115(b)(2)(H)]
11. **This** permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC § 116.110(e)]
12. **There** may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC § 116.115(c)]
13. **Emissions** from this facility must not cause or contribute to "air pollution" as defined in Texas Health and Safety Code (THSC) §382.003(3) or violate THSC § 382.085. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.
14. **The** permit holder shall comply with all the requirements of this permit. Emissions that exceed the limits of this permit are not authorized and are violations of this permit.¹

¹ Please be advised that the requirements of this provision of the general conditions may not be applicable to greenhouse gas emissions.

Common Acronyms in Air Permits

°C = Temperature in degrees Celsius	GLC _{max} = maximum (predicted) ground-level concentration
°F = Temperature in degrees Fahrenheit	gpm = gallon per minute
°K = Temperature in degrees Kelvin	gr/1000scf = grain per 1000 standard cubic feet
µg = microgram	gr/dscf = grain per dry standard cubic feet
µg/m ³ = microgram per cubic meter	H ₂ CO = formaldehyde
acfm = actual cubic feet per minute	H ₂ S = hydrogen sulfide
AMOC = alternate means of control	H ₂ SO ₄ = sulfuric acid
AOS = alternative operating scenario	HAP = hazardous air pollutant as listed in § 112(b) of the Federal Clean Air Act or Title 40 Code of Federal Regulations Part 63, Subpart C
AP-42 = Air Pollutant Emission Factors, 5th edition	HC = hydrocarbons
APD = Air Permits Division	HCl = hydrochloric acid, hydrogen chloride
API = American Petroleum Institute	Hg = mercury
APWL = air pollutant watch list	HGB = Houston/Galveston/Brazoria
BPA = Beaumont/ Port Arthur	hp = horsepower
BACT = best available control technology	hr = hour
BAE = baseline actual emissions	IFR = internal floating roof tank
bbl = barrel	in H ₂ O = inches of water
bbl/day = barrel per day	in Hg = inches of mercury
bhp = brake horsepower	IR = infrared
BMP = best management practices	ISC3 = Industrial Source Complex, a dispersion model
Btu = British thermal unit	ISCST3 = Industrial Source Complex Short-Term, a dispersion model
Btu/scf = British thermal unit per standard cubic foot or feet	K = Kelvin; extension of the degree Celsius scaled-down to absolute zero
CAA = Clean Air Act	LACT = lease automatic custody transfer
CAM = compliance-assurance monitoring	LAER = lowest achievable emission rate
CEMS = continuous emissions monitoring systems	lb = pound
cfm = cubic feet (per) minute	lb/day = pound per day
CFR = Code of Federal Regulations	lb/hr = pound per hour
CN = customer ID number	lb/MMBtu = pound per million British thermal units
CNG = compressed natural gas	LDAR = Leak Detection and Repair (Requirements)
CO = carbon monoxide	LNG = liquefied natural gas
COMS = continuous opacity monitoring system	LPG = liquefied petroleum gas
CPMS = continuous parametric monitoring system	LT/D = long ton per day
DFW = Dallas/ Fort Worth (Metroplex)	m = meter
DE = destruction efficiency	m ³ = cubic meter
DRE = destruction and removal efficiency	m/sec = meters per second
dscf = dry standard cubic foot or feet	MACT = maximum achievable control technology
dscfm = dry standard cubic foot or feet per minute	MAERT = Maximum Allowable Emission Rate Table
ED = (TCEQ) Executive Director	MERA = Modeling and Effects Review Applicability
EF = emissions factor	mg = milligram
EFR = external floating roof tank	mg/g = milligram per gram
EGU = electric generating unit	mL = milliliter
EI = Emissions Inventory	MMBtu = million British thermal units
ELP = El Paso	MMBtu/hr = million British thermal units per hour
EPA = (United States) Environmental Protection Agency	MSDS = material safety data sheet
EPN = emission point number	MSS = maintenance, startup, and shutdown
ESL = effects screening level	MW = megawatt
ESP = electrostatic precipitator	NAAQS = National Ambient Air Quality Standards
FCAA = Federal Clean Air Act	NESHAP = National Emission Standards for Hazardous Air Pollutants
FCCU = fluid catalytic cracking unit	NGL = natural gas liquids
FID = flame ionization detector	NNSR = nonattainment new source review
FIN = facility identification number	NO _x = total oxides of nitrogen
ft = foot or feet	NSPS = New Source Performance Standards
ft/sec = foot or feet per second	
g = gram	
gal/wk = gallon per week	
gal/yr = gallon per year	
GLC = ground level concentration	

PAL = plant-wide applicability limit
PBR = Permit(s) by Rule
PCP = pollution control project
PEMS = predictive emission monitoring system
PID = photo ionization detector
PM = periodic monitoring
PM = total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented
PM_{2.5} = particulate matter equal to or less than 2.5 microns in diameter
PM₁₀ = total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented
POC = products of combustion
ppb = parts per billion
ppm = parts per million
ppmv = parts per million (by) volume
psia = pounds (per) square inch, absolute
psig = pounds (per) square inch, gage
PTE = potential to emit
RA = relative accuracy
RATA = relative accuracy test audit
RM = reference method
RVP = Reid vapor pressure
scf = standard cubic foot or feet
scfm = standard cubic foot or feet (per) minute
SCR = selective catalytic reduction
SIL = significant impact levels
SNCR = selective non-catalytic reduction
SO₂ = sulfur dioxide
SOCMI = synthetic organic chemical manufacturing industry
SRU = sulfur recovery unit
TAC = Texas Administrative Code
TCAA = Texas Clean Air Act
TCEQ = Texas Commission on Environmental Quality
TD = Toxicology Division
TLV = threshold limit value
TMDL = total maximum daily load
tpd = tons per day
tpy = tons per year
TVP = true vapor pressure
VOC = volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
VRU = vapor recovery unit or system

Emission Sources - Maximum Allowable Emission Rates

Permit Number 45622

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (8)	
			lbs/hour	TPY (5)
KS2	Kiln No. 2 Stack	CO	14.46	63.33
		HCl	6.38	24.83
		HF	1.52	6.66
		NO _x	61.81	238.22
		Pb (6)	0.13	0.55
		PM	73.54	283.20
		PM ₁₀	29.14	112.06
		PM _{2.5}	29.14	112.06
		SO ₂ (4)	727.31	2353.83
		SO ₃ (6)	8.78	28.83
	VOC	0.29	1.13	
KS3	Kiln No. 3 Stack	CO	24.79	108.57
		HCl	10.94	42.56
		HF	2.61	11.42
		NO _x	105.95	408.38
		Pb (6)	0.22	0.95
		PM	126.27	486.38
		PM ₁₀	50.15	193.00
		PM _{2.5}	50.15	193.00
		SO ₂ (4)	1131.28	3716.60
		SO ₃ (6)	15.05	49.43
	VOC	0.50	1.94	
KS4	Kiln No. 4 Stack	CO	24.79	108.57
		HCl	10.94	42.56

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (8)	
			lbs/hour	TPY (5)
		HF	2.61	11.42
		NO _x	105.95	408.38
		Pb (6)	0.22	0.95
		PM	126.86	488.97
		PM ₁₀	50.74	195.59
		PM _{2.5}	50.74	195.59
		SO ₂ (4)	1131.38	3716.60
		SO ₃ (6)	15.05	49.43
		VOC	0.50	1.94
KS5	Kiln No. 5 Stack	CO	251.10	1100.00
		HCl	15.80	61.74
		HF	3.76	16.49
		NO _x	164.40	720.00
		Pb (6)	0.31	1.37
		PM	86.87	380.49
		PM ₁₀	42.55	186.33
		PM _{2.5}	42.55	186.33
		SO ₂ (4)	1170.00	5120.00
		SO ₃ (6)	15.60	68.33
VOC	0.50	2.50		
CLR3DC	Cooler No. 3 Baghouse Stack	CO	5.61	24.55
		HCl	1.29	5.66
		HF	0.01	0.03
		NO _x	1.29	5.64
		PM	0.59	2.59
		PM ₁₀	0.59	2.59
		PM _{2.5}	0.59	2.59

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (8)	
			lbs/hour	TPY (5)
		SO ₂	1.39	6.08
		SO ₃	0.10	0.45
CLR5DC	Cooler No. 5 Baghouse Stack	CO	11.37	49.79
		HCl	2.62	11.47
		HF	0.02	0.07
		NO _x	2.61	11.43
		PM	1.49	6.53
		PM ₁₀	1.49	6.53
		PM _{2.5}	1.49	6.53
		SO ₂	2.82	12.33
		SO ₃	0.21	0.91
MTLHDL	Material Handling (Raw and Calcined Coke Conveying) (7)	PM	72.19	46.94
		PM ₁₀	2.05	1.59
		PM _{2.5}	0.44	0.32
MTLLOAD	Raw Coke Loading Operations (Railcar and Truck Loading with Front-End Loader) (7)	PM	1.15	0.93
		PM ₁₀	0.14	0.11
		PM _{2.5}	0.01	0.01
MTLUNLOAD	Raw Coke Unloading Operations (Raw Petcoke Barge and Ship Crane Unloading, Railcar Unloading, and Truck Unloading)	PM	5.79	4.27
		PM ₁₀	0.69	0.46
		PM _{2.5}	0.11	0.08
PA-PILES	Process Area Short- Term Piles (7)	PM	0.13	0.57
		PM ₁₀	0.01	0.06
		PM _{2.5}	0.01	0.01
SP	Stockpiles (Raw and Calcined) (7)	PM	6.73	27.78
		PM ₁₀	0.74	3.22
		PM _{2.5}	0.12	0.52
5C2DC		PM	0.02	0.09

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (8)	
			lbs/hour	TPY (5)
	Conveyor 5C2 Insertable Dust Collector Vent	PM ₁₀	0.02	0.09
		PM _{2.5}	0.01	0.02
C25DC	Conveyor 25 Insertable Dust Collector Vent	PM	0.02	0.09
		PM ₁₀	0.02	0.09
		PM _{2.5}	0.02	0.07
C31DC	Conveyor 31 Insertable Dust Collector Vent	PM	0.02	0.09
		PM ₁₀	0.02	0.09
		PM _{2.5}	0.01	0.02
C35-HV	C35 Hi-Vac Unit Dust Collector Vent	PM	0.04	0.15
		PM ₁₀	0.04	0.15
		PM _{2.5}	0.01	0.05
C36DC	Conveyor C36 Insertable Dust Collector Vent	PM	0.04	0.18
		PM ₁₀	0.04	0.18
		PM _{2.5}	0.02	0.09
C-37	C36/37 Conveyor Transfer Chute Dust Collector Vent	PM	0.17	0.74
		PM ₁₀	0.17	0.74
		PM _{2.5}	0.02	0.09
C-38	C37/38 Conveyor Transfer Point Dust Collector Vent	PM	0.17	0.76
		PM ₁₀	0.17	0.76
		PM _{2.5}	0.02	0.09
C&S DTBV	C and S Daytank Bin Vent	PM	0.07	0.31
		PM ₁₀	0.07	0.31
		PM _{2.5}	0.01	0.05
CS-1	Calcine Silo No. 1 Bin Vent	PM	0.84	3.69
		PM ₁₀	0.84	3.69
		PM _{2.5}	0.02	0.09
CS-2		PM	0.70	3.08

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (8)	
			lbs/hour	TPY (5)
	Calcine Silo No. 2 Bin Vent	PM ₁₀	0.70	3.08
		PM _{2.5}	0.01	0.05
CS-3	Calcine Silo No. 3 Bin Vent	PM	0.70	3.08
		PM ₁₀	0.70	3.08
		PM _{2.5}	0.01	0.05
CS-4	Calcine Silo No. 4 Bin Vent	PM	0.49	2.16
		PM ₁₀	0.49	2.16
		PM _{2.5}	0.01	0.05
CS-CC	Main Calcine Material Handling System Dust Collector (Airtrol Dust Collector) Vent	PM	2.56	11.22
		PM ₁₀	2.56	11.22
		PM _{2.5}	0.06	0.34
CS-DV	T1/T2 Pneumatic Conveying System Dust Collector Vent	PM	0.33	1.43
		PM ₁₀	0.33	1.43
		PM _{2.5}	0.01	0.05
L6DC	Conveyor L6 Insertable Dust Collector Vent	PM	0.02	0.09
		PM ₁₀	0.02	0.09
		PM _{2.5}	0.02	0.09
L6ADC	Conveyor L6A Insertable Dust Collector Vent	PM	0.02	0.09
		PM ₁₀	0.02	0.09
		PM _{2.5}	0.02	0.09
L25ADC	Conveyor L25A Insertable Dust Collector Vent	PM	0.02	0.09
		PM ₁₀	0.02	0.09
		PM _{2.5}	0.02	0.09
L44DC	Conveyor L44 Insertable Dust Collector Vent	PM	0.04	0.18
		PM ₁₀	0.04	0.18
		PM _{2.5}	0.02	0.09
L45DC		PM	0.02	0.09

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (8)	
			lbs/hour	TPY (5)
	Conveyor L45 Insertable Dust Collector Vent	PM ₁₀	0.02	0.09
		PM _{2.5}	0.02	0.09
L30-DC	Conveyor L30 Dust Collector Vent	PM	0.02	0.09
		PM ₁₀	0.02	0.09
		PM _{2.5}	0.02	0.09
RD-DC2	Kiln RD Building Hi-Vac Dust Collector Vent	PM	0.07	0.08
		PM ₁₀	0.07	0.08
		PM _{2.5}	0.07	0.08
SL-1	Ship Loading Dock Area Dust Collector (L44 Dust Collector) Vent	PM	0.91	4.00
		PM ₁₀	0.91	4.00
		PM _{2.5}	0.09	0.06
SL1-DCL	Ship Loader DCL Spout Dust Collector Vent	PM	0.042	0.185
		PM ₁₀	0.042	0.185
		PM _{2.5}	0.004	0.019
SL1-T1	Ship Loader Transfer No. 1 (L44/L1) Dust Collector Vent	PM	0.09	0.38
		PM ₁₀	0.09	0.38
		PM _{2.5}	0.09	0.18
SL1-T2	Ship Loader Transfer No. 2 (L1/L2) Dust Collector Vent	PM	0.09	0.38
		PM ₁₀	0.09	0.38
		PM _{2.5}	0.09	0.09
SL1-T3	Ship Loader Transfer No. 3 (L2/L3) Dust Collector Vent	PM	0.02	0.09
		PM ₁₀	0.02	0.09
		PM _{2.5}	<0.01	0.01
SL-PIT-DC	Total Ship Loading Pit Dust Collector Stack 1 and Stack 2 Vent	PM	0.28	0.62
		PM ₁₀	0.28	0.62
		PM _{2.5}	0.09	0.02
SR-DC		PM	0.06	0.11

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (8)	
			lbs/hour	TPY (5)
	Sample Prep Building Dust Collector Vent	PM ₁₀	0.06	0.11
		PM _{2.5}	0.06	0.11
S1DC1	Silo 1 Insertable Dust Collector 1 Vent	PM	0.02	0.09
		PM ₁₀	0.02	0.09
		PM _{2.5}	0.02	0.02
S1DC2	Silo 1 Insertable Dust Collector 2 Vent	PM	0.02	0.09
		PM ₁₀	0.02	0.09
		PM _{2.5}	0.02	0.02
S1DC3	Silo 1 Insertable Dust Collector 3 Vent	PM	0.02	0.09
		PM ₁₀	0.02	0.09
		PM _{2.5}	0.02	0.02
S1DC4	Silo 1 Insertable Dust Collector 4 Vent	PM	0.02	0.09
		PM ₁₀	0.02	0.09
		PM _{2.5}	0.02	0.02
S2DC1	Silo 2 Insertable Dust Collector 1 Vent	PM	0.02	0.09
		PM ₁₀	0.02	0.09
		PM _{2.5}	0.02	0.03
S2DC2	Silo 2 Insertable Dust Collector 2 Vent	PM	0.02	0.09
		PM ₁₀	0.02	0.09
		PM _{2.5}	0.02	0.03
S2DC3	Silo 2 Insertable Dust Collector 3 Vent	PM	0.02	0.09
		PM ₁₀	0.02	0.09
		PM _{2.5}	0.02	0.03
S3DC1	Silo 3 Insertable Dust Collector 1 Vent	PM	0.02	0.09
		PM ₁₀	0.02	0.09
		PM _{2.5}	0.02	0.03
S3DC2		PM	0.02	0.09

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (8)	
			lbs/hour	TPY (5)
	Silo 3 Insertable Dust Collector 2 Vent	PM ₁₀	0.02	0.09
		PM _{2.5}	0.02	0.03
S3DC3	Silo 3 Insertable Dust Collector 3 Vent	PM	0.02	0.09
		PM ₁₀	0.02	0.09
		PM _{2.5}	0.02	0.03
S4DC1	Silo 4 Insertable Dust Collector 1 Vent	PM	0.02	0.09
		PM ₁₀	0.02	0.09
		PM _{2.5}	0.02	0.05
S4DCL44	Silo 4 Insertable Dust Collector at L44 Vent	PM	0.02	0.09
		PM ₁₀	0.02	0.09
		PM _{2.5}	0.02	0.05
MSS-FUG	Heavy Material Handling (7)(8)	PM	1.03	0.02
		PM ₁₀	0.49	0.01
		PM _{2.5}	0.07	0.01
	Refractory Removal (7)(8)	PM	1.35	0.12
		PM ₁₀	0.64	0.06
		PM _{2.5}	0.10	0.01
	Dust Collector Maintenance (7)(8)	PM	0.01	0.01
		PM ₁₀	0.01	0.01
		PM _{2.5}	0.01	0.01
	Vacuum Truck Solids Loading (7)(8)	PM	0.43	0.63
		PM ₁₀	0.15	0.22
		PM _{2.5}	0.02	0.03
Vacuum Truck Liquids Loading (7)(8)	VOC	0.08	0.01	

(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
HCl - hydrogen chloride
HF - hydrogen fluoride

Emission Sources - Maximum Allowable Emission Rates

- NO_x - total oxides of nitrogen
 - Pb - lead
 - PM - total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented
 - PM₁₀ - total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented
 - PM_{2.5} - particulate matter equal to or less than 2.5 microns in diameter
 - SO₂ - sulfur dioxide
 - SO₃ - sulfur trioxide
 - VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
- (4) The hourly emission rate for SO₂ shall be the limit for stack testing purposes. The hourly emission rate for reporting SO₂ compliance with the permit shall be based on a 7-day rolling average from a 24-hour composite analysis of the blended raw feed sulfur content. The annual emission rate for reporting SO₂ compliance with the permit shall be based on a calendar year.
- (5) Compliance with annual emission limits (tons per year) is based on a 12-month rolling period.
- (6) Emitted as PM and included in the PM and PM₁₀ emission rate.
- (7) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.
- (8) Planned startup and shutdown emissions are included. Maintenance activities, except as specified in Special Condition No. 37, are not authorized by this permit and will need separate authorization, unless the activity can meet the conditions of 30 TAC § 116.119.

Date: October 31, 2022

Permit Renewal Certification Option/Abbreviated Review Source Analysis & Technical Review

Company	Oxbow Calcining, LLC	Permit Number	45622
City	Port Arthur	Project Number	350830
County	Jefferson	Regulated Entity Number	RN100209287
Project Type	Renewal	Customer Reference Number	CN602552424
Project Reviewer	Kristyn Jacher	Received Date	November 30, 2022
Site Name	Petroleum Coke Calcining Plant		

Project Overview

Oxbow Calcining, LLC is requesting a renewal of their permit which authorizes air contaminants emitted from their Petroleum Coke Calcining Plant.

Scheduled Maintenance, Startup, and Shutdown (MSS) emissions are required to be authorized. Currently, these emissions are authorized as follows:

- Authorized in the existing permit

The company certifies that there are no changes required to the permit and has chosen the Renewal Certification Option. Neither the permit special conditions nor the maximum allowable emission rates table (MAERT) have been changed. An updated permit face document has been prepared.

Compliance History Evaluation - 30 TAC Chapter 60 Rules

A compliance history report was reviewed on:	January 6, 2023
Site rating & classification:	1.26 / Satisfactory
Company rating & classification:	1.26 / Satisfactory

Public Notice Information

Requirement	Date
Legislator letters mailed	12/5/2022
Date 1 st notice published	12/21/2022
Publication Name: The Port Arthur News	
Pollutants: Carbon monoxide, hazardous air pollutants, nitrogen oxides, organic compounds, particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less, lead and sulfur dioxide	
Date 1 st notice Alternate Language published	12/15/2022
Publication Name (Alternate Language): El Perico	
1 st public notice tearsheet(s) received	12/22/2022
1 st public notice affidavit(s) received	12/22/2022
1 st public notice certification of sign posting/application availability received	1/6/2023
Renewals with no increases, no new contaminants, and a satisfactory compliance history do not require 2nd public notice per 30 TAC 39.419(e)(1)	

Permit Renewal Certification Option/Abbreviated Review
Source Analysis & Technical Review

Permit No. 45622
Page 2

Regulated Entity No. RN100209287

Renewal Requirements

Requirement

Date of permit expiration: **6/04/2023**

Date written notice of review was mailed: **5/24/2022**

Is the facility being operated in accordance with all requirements and conditions of the existing permit, including representations in the application for permit to construct and subsequent amendments, and any previously granted renewal, unless otherwise authorized for a qualified facility? **Yes**

Permit Renewal Fee: \$10,000.00



3/1/2023

Project Reviewer
Kristyn Jacher

Date

Team Leader
Joe Nicosia

Date



Compliance History Report

Compliance History Report for CN602552424, RN100209287, Rating Year 2022 which includes Compliance History (CH) components from September 1, 2017, through August 31, 2022.

Customer, Respondent, or Owner/Operator:	CN602552424, Oxbow Calcining LLC	Classification: SATISFACTORY	Rating: 1.26
Regulated Entity:	RN100209287, OXBOW CALCINING	Classification: SATISFACTORY	Rating: 1.26
Complexity Points:	17	Repeat Violator: NO	
CH Group:	14 - Other		
Location:	3901 COKE DOCK RD PORT ARTHUR, TX 77640, JEFFERSON COUNTY		
TCEQ Region:	REGION 10 - BEAUMONT		

ID Number(s):

AIR OPERATING PERMITS ACCOUNT NUMBER JE0040F

AIR NEW SOURCE PERMITS PERMIT 45622

AIR NEW SOURCE PERMITS AFS NUM 4824500023

AIR NEW SOURCE PERMITS REGISTRATION 111704

WASTEWATER PERMIT WQ0001994000

AIR EMISSIONS INVENTORY ACCOUNT NUMBER JE0040F

INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXD008094153

AIR OPERATING PERMITS PERMIT 1493

AIR NEW SOURCE PERMITS ACCOUNT NUMBER JE0040F

AIR NEW SOURCE PERMITS REGISTRATION 111706

PETROLEUM STORAGE TANK REGISTRATION REGISTRATION 72418

WASTEWATER EPA ID TX0068781

POLLUTION PREVENTION PLANNING ID NUMBER P07300

INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE REGISTRATION # (SWR) 30128

Compliance History Period: September 01, 2017 to August 31, 2022 **Rating Year:** 2022 **Rating Date:** 09/01/2022

Date Compliance History Report Prepared: October 30, 2023

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: November 30, 2017 to November 30, 2022

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.

Name: TCEQ Staff Member

Phone: (512) 239-1000

Site and Owner/Operator History:

- 1) Has the site been in existence and/or operation for the full five year compliance period? YES
- 2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO

Components (Multimedia) for the Site Are Listed in Sections A - J

A. Final Orders, court judgments, and consent decrees:

1 Effective Date: 08/19/2019 ADMINORDER 2018-1687-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.21
 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)(i)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Condition 13 PERMIT
 General Terms and Conditions OP
 Special Condition 25 OP
 Special Terms and Conditions 8 OP

Description: Failure to prevent air emissions from exceeding the NAAQS 75 ppb 1-hour SO2 average.

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

D. The approval dates of investigations (CCEDS Inv. Track. No.):

Item 1	December 12, 2017	(1468672)
Item 2	January 15, 2018	(1475383)
Item 3	February 12, 2018	(1487579)
Item 4	March 16, 2018	(1491257)
Item 5	April 10, 2018	(1494508)
Item 6	April 24, 2018	(1481415)
Item 7	May 15, 2018	(1501455)
Item 8	June 13, 2018	(1508546)
Item 9	July 10, 2018	(1496887)
Item 10	July 16, 2018	(1514876)
Item 11	July 25, 2018	(1503976)
Item 12	August 17, 2018	(1520930)
Item 13	September 14, 2018	(1528111)
Item 14	October 01, 2018	(1518248)
Item 15	October 12, 2018	(1534454)
Item 16	November 15, 2018	(1542288)
Item 17	November 20, 2018	(1526428)
Item 18	December 14, 2018	(1546056)
Item 19	January 17, 2019	(1562205)
Item 21	February 19, 2019	(1562203)
Item 22	March 18, 2019	(1562204)
Item 23	April 15, 2019	(1572654)
Item 24	May 17, 2019	(1584917)
Item 25	June 11, 2019	(1584918)
Item 26	July 03, 2019	(1556221)
Item 27	July 11, 2019	(1594004)
Item 28	August 13, 2019	(1600325)
Item 29	September 17, 2019	(1607217)
Item 30	September 23, 2019	(1597603)
Item 31	October 16, 2019	(1614069)
Item 32	November 20, 2019	(1619880)
Item 33	December 13, 2019	(1627241)
Item 34	January 11, 2020	(1634876)
Item 35	February 19, 2020	(1641493)
Item 36	March 11, 2020	(1648002)
Item 37	April 03, 2020	(1639134)
Item 38	April 15, 2020	(1654353)
Item 39	April 24, 2020	(1644673)
Item 40	May 12, 2020	(1660918)
Item 41	June 15, 2020	(1667451)
Item 42	July 20, 2020	(1659844)
Item 45	August 13, 2020	(1681175)
Item 46	September 14, 2020	(1687744)
Item 47	September 23, 2020	(1670823)
Item 48	October 12, 2020	(1694090)
Item 49	November 16, 2020	(1714927)
Item 50	December 15, 2020	(1714928)
Item 51	January 07, 2021	(1686367)
Item 52	January 14, 2021	(1714929)
Item 53	February 16, 2021	(1727992)
Item 54	March 12, 2021	(1727993)

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

Special Conditions

Permit Number 45622

Emission Standards

1. This permit authorizes those sources of emissions listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates," and those sources are limited to the emission rates and other conditions specified in the table. In addition, this permit authorizes all emissions from planned startup and shutdown activities associated with facilities or groups of facilities that are authorized by this permit. **(9/13)**

Fuel Specifications

2. Fuel for rotary Kilns No. 2 (Emission Point Number [EPN] KS2), No. 3 (EPN KS3), No. 4 (EPN KS4) and No. 5 (EPN KS5) shall be pipeline quality sweet natural gas. Use of any other fuel will require prior approval of the Executive Director of the Texas Commission on Environmental Quality (TCEQ). **(11/11)**
3. Upon request by the Executive Director of the TCEQ or the TCEQ Regional Director, or any local air pollution control program having jurisdiction, the holder of this permit shall provide a sample, and/or an analysis of the fuels used in these facilities or shall allow air pollution control program representatives to obtain a sample for analysis. **(7/07)**

Opacity and Visible Emission Limits

4. Opacity of emissions from Kilns No. 2, No. 3 and No. 4 Stacks when venting through EPNs KS2, KS3 and KS4 shall be limited to 15 percent, except for those periods described in Title 30 Texas Administrative Code (30TAC) Chapters 101.201 and 101.211. Determination of compliance with the foregoing requirements for EPNs KS2, KS3 and KS4 (hot stacks) shall be made by first observing for visible emission for EPNs KS2, KS3, and KS4 using the U.S. Environmental Protection Agency (EPA) Title 40 Code of Federal Regulations (CFR) Part 60, Appendix A, Test Method (TM) 22 on a daily basis during hot stack operation. If visible emissions are observed from the emission point, opacity shall be determined using the EPA 40 CFR part 60, Appendix A, TM 9. Contributions from uncombined water vapor shall not be included in determining compliance with this condition. **(10/19)**
5. Opacity of emissions from Kiln No. 5 Stack, when venting through EPN KS5, shall be limited to 15 percent, except for those periods described in 30TAC Chapters 101.201 and 101.211. Determination of compliance with the foregoing requirements for EPN KS5 (the hot stack) shall be made by first observing for visible emissions on a daily basis during hot stack operation. If visible emissions are observed from the emission point, opacity shall be determined using the EPA 40 CFR Part 60, Appendix A, TM 9. Contributions from uncombined water vapor shall not be included in determining compliance with this condition. **(10/19)**
6. Opacity of emissions from Kiln RD Building Hi-Vac Dust Collector Vent (EPN RD-DC2), Sample Prep Building Dust Collector Vent (EPN SR-DC), C and S Daytank Bin Vent (EPN C&S DTBV), Ship Loader DCL Spout Dust Collector Vent (EPN SL1-DCL), Ship Loader Transfer No. 1 (L44/L1) Dust Collector Vent (EPN SL1-T1), Ship Loader Transfer No. 2 (L1/L2) Dust Collector Vent (EPN SL1-T2), Ship Loader Transfer No. 3 (L2/L3) Dust Collector Vent (EPN SL1-T3), Ship Loading Dock Area Dust Collector (L44 Dust Collector) Vent (EPN SL-1), C36/37 Conveyor Transfer Chute Dust Collector Vent (EPN C-37), C37/38 Conveyor Transfer Point Dust Collector Vent (EPN C-38),

T1/T2 Pneumatic Conveying System Dust Collector Vent (EPN CS-DV), Calcine Silo No. 1 Bin Vent (EPN CS-1), Calcine Silo No. 2 Bin Vent (EPN CS-2), Calcine Silo No. 3 Bin Vent (EPN CS-3), Calcine Silo No. 4 Bin Vent (EPN CS-4), Main Calcine Material Handling System Dust Collector (Airtrol Dust Collector) Vent (EPN CS-CC), C35 Hi-Vac Unit Dust Collector Vent (EPN C35-HV), Total Ship Loading Pit Dust Collector Stack 1 and Stack 2 Vent (EPNs SL-PIT-DC), Silo 1 Insertable Dust Collector 1 Vent (EPN S1DC1), Silo 1 Insertable Dust Collector 2 Vent (EPN S1DC2), Silo 1 Insertable Dust Collector 3 Vent (EPN S1DC3), Silo 1 Insertable Dust Collector 4 Vent (EPN S1DC4), Silo 2 Insertable Dust Collector 1 Vent (EPN S2DC1), Silo 2 Insertable Dust Collector 2 Vent (EPN S2DC2), Silo 2 Insertable Dust Collector 3 Vent (EPN S2DC3), Silo 3 Insertable Dust Collector 1 Vent (EPN S3DC1), Silo 3 Insertable Dust Collector 2 Vent (EPN S3DC2), Silo 3 Insertable Dust Collector 3 Vent (EPN S3DC3), Silo 4 Insertable Dust Collector 1 Vent (EPN S4DC1), Silo 4 Insertable Dust Collector at L44 Vent (EPN S4DCL44), Conveyor 25 Insertable Dust Collector Vent (EPN C25DC), Conveyor L25A Insertable Dust Collector Vent (EPN L25ADC), Conveyor 31 Insertable Dust Collector Vent (EPN C31DC), Conveyor 5C2 Insertable Dust Collector Vent (EPN 5C2DC), Conveyor L44 Insertable Dust Collector Vent (EPN L44DC), Conveyor L6 Insertable Dust Collector Vent (EPN L6DC), Conveyor L6A Insertable Dust Collector Vent (EPN L6ADC), Conveyor L45 Insertable Dust Collector Vent (EPN L45DC), Conveyor L30 Dust Collector Vent (EPN L30-DC), Conveyor C36 Insertable Dust Collector Vent (EPN C36DC), Cooler No. 3 Baghouse Stack (EPN CLR3DC), and Cooler No. 5 Baghouse Stack (EPN CLR5DC) shall be limited to 5 percent, except for those periods described in 30TAC Chapters 101.201 and 101.211. Determination of compliance with this requirement shall be made by first observing for visible emissions during normal plant operations. Observations shall be made at least 15 feet away from the emission point whenever possible. If it is not physically possible to make the observations at least 15 feet away from the emission point, then the observation will be made as far away from the emission point as possible. Observations will not be made more than 0.25 mile from the emission point. If visible emissions are observed from the emission point, opacity shall be determined using the EPA 40 CFR Part 60, Appendix A, TM 9. Contributions from uncombined water vapor shall not be included in determining compliance with this condition. Determination of compliance with this requirement shall be performed and the results recorded quarterly. **(10/22)**

7. There shall be no visible fugitive emissions leaving the property from any of the process areas or raw materials storage areas. Observations for visible emissions shall be performed and recorded quarterly. The visible emissions determination shall be made during normal plant operations. Observations shall be made on the downwind property line for a minimum of six minutes. If visible emissions are observed, an evaluation must be accomplished in accordance with the EPA 40 CFR Part 60, Appendix A, TM 22, using the criteria that visible emissions shall not exceed a cumulative 30 seconds in duration in any six-minute period. If visible emissions exceed the TM 22 criteria, corrective action to eliminate the source of excessive visible emissions shall be taken promptly and documented within 24 business hours of first observing the visible emissions. **(6/13)**

Operational Limits and Work Practices

8. The additive listed in the "CONFIDENTIAL" addendum having an approval date of November 21, 2011, is authorized for use and the usage rate shall not exceed the quantities shown. **(11/11)**
9. Kiln throughput is limited to the following maximum hourly and annual usage rates of raw petroleum cokes and blended sulfur content: **(11/11)**

Raw Petroleum
Coke Usage

Raw Petroleum
Coke Usage

	Tons/hour	Tons/year	Sulfur Percent
Kiln No. 2	21	183,960	4.5
Kiln No. 3	36	315,360	4.0
Kiln No. 4	36	315,360	4.0
Kiln No. 5	52	455,520	4.0

A higher blended sulfur content shall be allowed provided the permitted emission rates are not exceeded.

10. Sitewide operations for unloading petroleum coke.

- A. Raw coke from barges, ships, railcars and trucks shall not exceed 2,100 tons per hour (tph) and 1,200,000 tons per year (tpy).

Barges and/or ships may be unloaded by clam shell either directly to trucks or to the unloading hopper. Simultaneous unloading to both trucks and the unloading hopper is not authorized. **(12/09)**

Raw petcoke may be reclaimed from stockpiles and dropped onto temporary storage piles by front-end loader and raw petcoke may be reclaimed from temporary storage piles and loaded onto barges and/or ships by clam shell. **(11/11)**

- B. Wet calcined coke and calcined coke unloaded from barges and ships shall not exceed the following limits: **(10/22)**

Wet calcined coke 600 tph and 30,000 tpy

Calcined coke 400 tph and 155,000 tpy

11. Sitewide loadout of calcined coke shall not exceed 720 tph and 1,200,000 tpy.

12. Emission limits for sulfur dioxide (SO₂) from Kilns 2, 3, 4, and 5 are based on a material balance calculation using a blended raw coke feed with a sulfur content of 3 percent. Raw feed coke with higher blended sulfur content may be used provided the emission limits are not exceeded. Verification of compliance with emission limits shall be based on the following equation:

$$SO_2 \text{ (lbs/hr)} = [\text{Raw Petcoke Feed Rate (tons per hour)} \times (1 - \% \text{ H}_2\text{O}) \times \text{sulfur content (\%)}] - [\text{Calcined Petcoke Production Rate (tons per hour)} \times \text{sulfur content (\%)}] \times 2000 \times 64/32 \times (1 - SO_3 \text{ Formation rate})(\%). \text{ (11/11)}$$

13. Emissions exhausting from the Kiln RD Building Hi-Vac (EPN RD-DC2), Sample Prep Building (EPN SR-DC), C and S Daytank Bin (EPN C&SDBTV), Ship Loader DCL Spout (EPN SL1-DCL), Ship Loader Transfer No. 1 (L44/L1) (EPN SL1-T1), Ship Loader Transfer No. 2 (L1/L2) (EPN SL1-T2), Ship Loader Transfer No. 3 (L2/L3) (EPN SL1-T3), Ship Loading Dock Area (EPN SL-1), C36/37 Conveyor Transfer Chute (EPN C-37), C37/38 Conveyor Transfer Point (EPN C-38), T1/T2 Pneumatic Conveying System (EPN CS-DV), Calcine Silo No. 1 Bin (EPN CS-1), Calcine Silo No. 2 Bin (EPN CS-2), Calcine Silo No. 3 Bin (EPN CS-3), Calcine Silo No. 4 Bin (EPN CS-4), Main Calcine Material Handling System (EPN CS-CC), and C35 Hi-Vac Unit (EPN C35-HV) shall be controlled by a fabric/cartridge filter capable of achieving an outlet grain loading not greater than 0.01 grains per dry standard cubic feet. Fabric/cartridge filter baghouses shall be properly installed

and in good working order to control particulate matter emissions from each facility listed in this special condition emitting particulate matter (PM), particulate matter less than 10 microns (PM₁₀), and particulate matter less than 2.5 microns (PM_{2.5}) when this equipment is in operation. **(3/19)**

14. Emissions exhausting from Total Ship Loading Pit (EPNs SL-PIT-DC), Silo 1 (EPNs S1DC1, S1DC2, EPN S1DC3, and S1DC4), Silo 2 (EPNs S2DC1, S2DC2, and S2DC3), Silo 3 (EPNs S3DC1, S3DC2, and S3DC3), Silo 4 (EPNs S4DC1 and S4DCL44), Conveyor 25 (EPN C25DC), Conveyor L25A (EPN L25ADC), Conveyor 31 (EPN C31DC), Conveyor 5C2 (EPN 5C2DC), Conveyor L44 (EPN L44DC), Conveyor L6 (EPN L6DC), Conveyor L6A (EPN L6ADC), Conveyor L45 (EPN L45DC), Conveyor L30 Dust Collector Vent (EPN L30-DC), and Conveyor C36 (EPN C36DC) shall be controlled by a fabric/cartridge filter capable of achieving an outlet grain loading not greater than 0.002 grains per dry standard cubic feet. Fabric/cartridge filter baghouses shall be properly installed and in good working order to control particulate matter emissions from each facility listed in this special condition emitting PM, PM₁₀, and PM_{2.5} when this equipment is in operation. **(10/22)**
15. Emissions exhausting from Cooler No. 3 (EPNs CLR3DC) and Cooler No. 5 (EPN CLR5DC) shall be controlled by a fabric/cartridge filter capable of achieving an outlet grain loading not greater than 0.003 grains per actual cubic feet. Fabric/cartridge filter baghouses shall be properly installed and in good working order to control particulate matter emissions from each facility listed in this special condition emitting PM, PM₁₀, and PM_{2.5} when this equipment is in operation. **(6/13)**
16. Emissions from transfer points 85b-85d, 90a-90b, 91a-91b, 93a-93b, 100a-100b, 101a-101b, 103a-103b, 124, 118a-118b, 119a-119b, 120, 121, 122a-122b, 123a-123b, 125, 155a-155b, 158a-158b, 159, 160a-160b, 161a-161b, 163a-163b, 165a-165b, 175a-175b, 176a-176b, 182, 184, 185, 186, 181, 129, 152, 153, 154, 147, 151, 141, 142, 136, 137, and 138; Ship Loading Pit 2; Silos 1, 2, 3, and 4; Conveyors L6A, C25, L25A, C31, 5C2, L44, L6, L45, and C36; and Cooler No. 2, 3, and 5 shall be exhausted to a fabric filter or cartridge filter dust collector. **(11/11)**
17. The fire crown burners and combustion chamber pre-heater burners for Kiln No. 3, fire crown burners and combustion chamber pre-heater burners for Kiln No.4 and fire crown burners and combustion chamber pre-heater burners for Kiln No. 5 may operate simultaneously during non-routine operations; however, combustion chamber pre-heater burners are limited to operation only during non-routine, including, but not limited to maintenance, standby and startup operations. **(11/11)**
18. Sitewide stockpiles for storage of raw pet coke shall not exceed 36.1 acres. **(4/09)**
19. Sitewide stockpiles for storage of calcined pet coke shall not exceed 5.5 acres. **(4/09)**
20. Water sprays shall be employed, as necessary, to control particulate matter emissions from the raw coke stockpiles. **(4/09)**
21. De-dust oil shall be used to control particulate matter emissions from the calcined coke stockpiles, except when unsafe conditions could potentially occur. **(4/09)**
22. Upon request by the Executive Director of the TCEQ or any local air pollution control program having jurisdiction, the holder of this permit shall provide a representative composite sample and/or a representative composite analysis of the raw petroleum coke feed utilized in this kiln or shall allow the TCEQ or air pollution control program representatives to obtain a representative composite

sample for analysis, provided the sample is taken in accordance with appropriate procedures for the calcined petroleum coke industry.

23. Raw coke unloading, loading, and transfer operations not controlled by a dust collector shall employ methods to include water sprays, or partial enclosure, or wet material to reduce particulate matter emissions to the atmosphere except for transfer points leading to the kilns. **(9/10)**
24. If this permitted facility or any portion of it exceeds any of the applicable allowable emission rates or other standards, the holder of this permit must take immediate corrective action to comply with the applicable standards and record the event. These actions may include (but are not limited to) reducing operating temperature, reducing throughput, and the installation of additional control equipment. These corrective actions shall not be considered complete until compliance with the allowable emission rates and/or other standards has been demonstrated. Demonstration may include testing. **(11/11)**
25. All hooding, duct, and collection systems shall be effective in capturing emissions from the intended equipment and in preventing fugitive emissions from the structure. The hooding and duct systems shall be maintained free of holes, cracks and other conditions that would reduce the collection efficiency of the emission capture system. Applicable equipment includes the cooler baghouses, dust collector housing, duct work to the dust collectors, and the duct work to the cooler baghouses. **(6/13)**

Initial Determination of Compliance

26. To demonstrate compliance with the MAERT and with emission performance levels as specified in the special conditions, the holder of this permit shall perform initial stack sampling of Kiln No. 2 (EPN KS2), Kiln No. 3 (EPNs KS3), Kiln No. 4 (EPNs KS4) and Kiln No. 5 (EPNs KS5) to establish the actual quantities of air contaminants being emitted into the atmosphere within 180 days of issuance of the November 2011 amendment. Unless otherwise specified by this condition, Sampling must be conducted in accordance with the TCEQ Sampling Procedures Manual or in accordance with the applicable EPA 40 CFR procedures. Any deviations from those procedures must be approved by the TCEQ Executive Director prior to sampling. With TCEQ Regional approval, this deadline may be adjusted, or previous kiln testing may be accepted for meeting the initial sampling requirement.

Air contaminants to be tested for include particulate matter (PM), particulate matter equal to or less than 10 microns in diameter (PM₁₀), nitrogen oxide (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), sulfur trioxide (SO₃), hydrogen chloride (HCl), lead (Pb) and hydrogen fluoride (HF). Sampling to demonstrate compliance shall occur during normal kiln operations. Compounds that have previously undergone initial stack sampling will not require re-sampling to meet the initial sampling requirement. **(10/19)**

Demonstration of Continuous Compliance

27. Upon request by the TCEQ Executive Director or the TCEQ Regional Director having jurisdiction, that agency staff have documented visible emissions from any emission point exceeding the opacity limits specified in Special Condition No. 4, 5, 6 and/or 7 or upon request by the Executive Director of the TCEQ or any local air pollution control agency having jurisdiction, the holder of this permit shall conduct stack sampling and/or other testing as required to establish the actual pattern

and quantities of particulates being emitted into the atmosphere to demonstrate compliance with the MAERT and with emission performance levels as specified in the special conditions and/or otherwise prove satisfactory equipment performance. Sampling must be conducted in accordance with appropriate procedures of the TCEQ Sampling Procedures Manual and in accordance with the applicable EPA 40 CFR procedures. Any deviations from these procedures must be approved by the TCEQ Executive Director or the appropriate TCEQ Regional Director prior to conducting sampling.

Air contaminants to be tested shall be determined in coordination with the TCEQ Regional Manager. Sampling to demonstrate compliance shall occur during normal kiln operations. **(6/13)**

28. After initial demonstration of compliance, on-going stack sampling for nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), hydrogen chloride (HCl), and hydrogen fluoride shall be performed once annually during periods of normal operation, except, if after two years of stack sampling, the average of the two annual stack sampling results for a pollutant is less than 70 percent of the maximum allowable emission rate, then compliance stack sampling for such pollutant may be conducted once every three years. With TCEQ Regional Manager approval, annual testing may be limited to testing only one of the four kilns, with the non-tested kilns being tested in follow-on years. **(11/11)**

Sampling required by this special condition shall be conducted in accordance with the methods, procedures, and notification protocol specified in Sampling Requirements below.

29. The holder of this permit shall perform visible emissions observations for the Cooler No. 3 Baghouse (EPN CLR3DC) and Cooler No. 5 Baghouse (EPN CLR5DC). **(6/13)**

Daily visible emissions observations shall be made and recorded in accordance with the requirements specified in 40 CFR § 64.7(c). Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 miles, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor.

If visible emissions are observed, the permit holder shall determine the opacity, consistent with TM 9, as soon as practicable but no later than 24 hours after observing visible emissions. If a TM 9 is performed, the opacity limit is the corresponding opacity limit associated with the particulate matter standard in the permit specific condition. If the result of TM 9 is opacity above the corresponding opacity limit established in Special Condition No. 6, the permit holder shall report a deviation.

30. The holder of this permit may elect to collect monitoring data on a more frequent basis and average the data, consistent with the averaging times specified, for purposes of determining whether a deviation has occurred for the Cooler No. 3 Baghouse and Cooler No. 5 Baghouses and opacity readings for Kiln No. 2 Stack (EPN KS2), Kiln No. 3 Stack (KS3), Kiln No. 4 Stack (KS4), and Kiln No. 5 Stack (KS5). If the permit holder chooses to collect monitoring data on a more frequent basis and average the data, the additional data points must be collected on a regular basis. In no event

shall data be collected and used in particular instances in order to avoid reporting deviations. All monitoring data shall be collected in accordance with the requirements specified in 40 CFR § 64.7(c). **(10/19)**

31. The holder of this permit shall perform monthly inspections to verify proper operation of the capture system to verify there are no holes, cracks, and/or other conditions that would reduce the collection efficiency of the emission capture system as represented for the Cooler No. 3 Baghouse and Cooler No. 5 Baghouse. If the results of the inspections indicate that the capture system is not operating properly, the permit holder shall promptly take necessary corrective actions. The holder of this permit shall perform monthly inspections of the pyroscrubber systems to verify there are no conditions that result in emissions not being properly directed to the Kiln Hot Stacks (EPNs KS2, KS3, KS4, and KS5). If the results of the inspections indicate the systems are not properly directing emissions to each stack, the permit holder shall promptly take necessary corrective actions. **(10/19)**
32. Cooler No. 3 Baghouse, Cooler No. 5 Baghouse, Kiln No. 2 Pyroscrubber, Kiln No. 3 Pyroscrubber, Kiln No. 4 Pyroscrubber, and Kiln No. 5 Pyroscrubber shall not have a bypass. **(10/19)**

Sampling Requirements

33. Sampling shall be conducted in accordance with the appropriate procedures of the TCEQ Sampling Procedures Manual, or applicable EPA Methods in 40 CFR Part 60, Appendix A.
 - A. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at their own expense. Sampling ports and platform(s) shall be installed on the exhaust stack according to the specifications set forth in the attachment entitled "Chapter 2, Stack Sampling Facilities" prior to stack sampling. Alternate sampling facility designs may be submitted for approval by the TCEQ Regional Office with jurisdiction. **(6/13)**
 - B. The following test methods shall be used for determining compliance with permit emission limits for PM, PM₁₀, and SO₃ through stack testing:
 - (1) PM from kiln stacks - EPA Method 5 shall be used to determine the filterable component of total PM. EPA Method 202 dated December 21, 2010 shall be used to determine the condensable component of the total PM. **(10/19)**
 - (2) PM₁₀ from kiln stacks - PM₁₀ emissions from kiln stacks shall be determined by multiplying the total PM emissions measured pursuant to this special condition by the ratio of the PM₁₀ to PM permit allowable emissions from the maximum allowable emission rate table of the permit.
 - (3) SO₃ from kiln stacks - EPA Method 8 shall be used to determine the SO₃ emissions from kiln stacks. **(10/19)**Revisions to the foregoing methods including (but not limited to) incorporating changes from subsequent revisions to EPA Method 202 (OTM28) may be made by agreement between the permit holder and a representative of the TCEQ Executive Director. Such agreement may be reached during a pretest meeting prior to the stack testing. **(4/10)**
34. If testing is required, a pretest meeting concerning the required testing shall be held with personnel from the TCEQ before the required tests are performed. Air contaminants to be tested for will be defined and the TM to be used shall be determined at this pretest meeting.

- A. Sampling shall occur within 60 days of being informed that testing other than that set forth specifically in this permit is required.
- B. A pretest meeting shall be held with personnel from the TCEQ before the required tests are performed. The TCEQ Regional Office with jurisdiction shall be notified not less than 30 days prior to sampling to schedule a pretest meeting. The notice shall include: **(6/13)**
- (1) Date for pretest meeting;
 - (2) Date sampling will occur;
 - (3) Points or sources to be sampled;
 - (4) Name of firm conducting sampling;
 - (5) Type of sampling equipment to be used; and
 - (6) Method or procedure to be used in sampling.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test reports. The permit holder shall present at the pretest meeting the manner in which stack sampling will be executed in order to demonstrate compliance with emission.

- C. Alternate sampling methods and representative unit testing may be proposed by the permit holder. A written proposed description of any deviation from sampling procedures or emission sources specified in permit conditions or TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. Such a proposal must be approved by the TCEQ Regional Office with jurisdiction at least two weeks prior to sampling. **(6/13)**
- D. During stack sampling emission testing, the facilities shall operate at maximum represented kiln hourly feed rates. Primary operating parameters that enable determination of maximum hourly kiln feed rates shall be monitored and recorded during the stack test. These parameters are to be determined at the pretest meeting.

If the plant is unable to operate at the maximum represented kiln hourly feed rates during testing, then additional stack testing may be required when the hourly kiln feed rates exceed the previous stack test kiln hourly feed rate by +10 percent unless otherwise determined, in writing, by the TCEQ Executive Director. For compliance with this condition the feed rate will be determined by calculating a daily average from 24 one-hour feed rate readings. **(6/13)**

- E. Requests for additional time to perform sampling shall be submitted to the TCEQ Regional Office with jurisdiction. Additional time to comply with the applicable federal requirements requires EPA approval, and requests shall be submitted to the TCEQ Regional Office with jurisdiction. **(6/13)**
- F. The sampling report shall include the following:
- (1) Plant production rate in pounds of coke calcined per hour;
 - (2) The sulfur content of the raw coke;
 - (3) Fuel consumption rate in standard cubic feet per minute; and
 - (4) Any other pertinent parameters, as determined at the pretest meeting.

- G. One copy of the final sampling report shall be submitted within 60 days after sampling is completed. Sampling reports shall comply with the provisions of Chapter 14 of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows:

One copy to the TCEQ Regional Office with jurisdiction. **(4/10)**

- 35. If, as a result of stack sampling, compliance with the permitted emission rates cannot be demonstrated, the holder of this permit shall adjust any operating parameters so as to comply with all special conditions and the permitted emission rates. **(6/13)**
- 36. If the holder of this permit is required to adjust any operating parameters for compliance, then beginning no later than 60 days after the date of the test conducted, the holder of this permit shall submit to the TCEQ, on a monthly basis, a record of adjusted operating parameters and daily records of hourly kiln feed rates sufficient to demonstrate compliance with the permitted emission rates. Daily records of hourly kiln feed rates and operating parameters shall be distributed as follows: **(6/13)**

One copy to the TCEQ Regional Office with jurisdiction.
 One copy to the TCEQ Office of Air, Air Permits Division in Austin.

Upon written request from the permit holder, the TCEQ Executive Director may waive the recordkeeping requirements of this special condition, provided the permit holder demonstrates compliance through additional sampling with the emission rates and conditions of this permit.

Planned Maintenance, Startup, and Shutdown (MSS)

- 37. This permit authorizes emissions from Heavy Material Handling, Refractory Removal, Dust Collector Maintenance, Vacuum Truck Liquids Loading, and Vacuum Truck Solids Loading (EPN MSS FUG), listed on the maximum allowable emission rate table (MAERT) for the following planned MSS activities in a rolling twelve-month period. Planned MSS activities not listed in this special condition are not authorized by this permit. **(10/19)**

- A. Heavy material handling maintenance activities include cleaning each pyroscrubber settling chamber, each pyroscrubber combustion chamber, gunnite application (inside each kiln, each cooler, each pyroscrubber, each kiln stack), mixing of refractory material, and loading of refractory for disposal and are limited to the following throughputs.

Throughput (tons/hour)	Throughput (tons/year)	Abatement Method
15	250	Full Enclosure
15	250	Partial Enclosure
30	1800	Water Spray
Total: 60	Total: 2300	--

- B. Refractory removal maintenance activities include demolition of the refractory and removal of refractory for repairs or replacement and are limited to the following throughputs.

Throughput (tons/hour)	Throughput (tons/year)	Abatement Method
15	1800	Full Enclosure

Throughput (tons/hour)	Throughput (tons/year)	Abatement Method
15	1800	No Enclosure
Total: 30	Total: 3600	--

- C. Dust collector (also referred to as a baghouse or bag filter) maintenance activities included at the site are changing each bag filter and emptying and cleaning hopper(s). The maintenance activities shall be limited to a maximum of 5,000 dust collector replacements on a rolling twelve-month basis.
- D. Vacuum truck liquids loading includes capturing various liquids such as oils, diesel, water or a combination of these liquids. Vacuum truck liquids loading shall be limited up to a maximum of 15.00 barrels per rolling twelve-month basis. Vacuum truck solids loading includes capturing particulate matter such as dry pet coke and/or slurries when equipped with a particulate filter. Vacuum truck solids loading shall be limited up to a maximum of 2,920 hours per rolling twelve-month basis.

Recordkeeping Requirements

- 38. Records shall be maintained at this facility site and made available at the request of personnel from the TCEQ or any other air pollution control program having jurisdiction to demonstrate compliance with permit limitations. These records shall be totaled for each calendar month, retained for a rolling 60-month period, and include the following: **(11/22)**
 - A. Hourly and annual petroleum coke usage rates (including blended sulfur content) in tons;
 - B. Monthly record of the rolling 12-month petroleum coke usage rates (including blended sulfur content) in tons; **(11/22)**
 - C. Monthly records of hourly and rolling 12-month emission rates for lead (Pb) which shall be calculated by multiplying the hourly and 12-month rolling petroleum coke usage rates by the lead emission factor as set forth in Oxbow submittal dated November 3, 2022, in order to demonstrate compliance with the MAERT and the throughput limitations in Special Condition 9. The required data shall be kept with examples of the method for calculating the rates including units, conversion factors, assumptions, and the basis of the assumptions; **(11/22)**
 - D. Monthly records of hourly and rolling 12-month emission rates for Volatile Organic Compounds (VOCs) which shall be calculated by multiplying the hourly and 12-month rolling petroleum coke usage rates by the VOC emission factor as set forth in Oxbow submittal dated November 3, 2022, in order to demonstrate compliance with the MAERT and the throughput limitations in Special Condition 9. The required data shall be kept with examples of the method for calculating the rates including units, conversion and control factors, assumptions, and the basis of the assumptions; **(11/22)**
 - E. Seven-day rolling average blended raw feed sulfur content;
 - F. Seven-day rolling average SO₂ emission rate based on daily production in tons per hour;
 - G. Confidential Addendum dated November 21, 2011; **(11/11)**
 - H. Shutdown, malfunctions in the process, and malfunctions of any air pollution abatement equipment;

- I. Hourly additive usage based on a 30-day usage divided by hours operated during the 30-day period and the annual additive usage;
 - J. Records of site-wide unloading of raw coke and load-out of calcined coke in tons;
 - K. Observations for visible emissions and/or opacity determinations required by Special Condition No. 4, 5, 6 and 7 and actions taken; and **(9/10)**
 - L. Records of materials used that have the potential to emit HCl shall be kept in sufficient detail in order to allow all required emission rates to be fully and accurately calculated. Using this recorded data, a report shall be produced for the emission of HCl (in tons per year) over the previous 12 consecutive months. The required records shall be kept with examples of the method of data reduction including units, conversion factors, assumptions, and the basis of the assumptions. **(9/10)**
 - M. The description of the heavy material handling activities; and the estimated quantity of heavy material handled on an hourly and annual throughput basis in tons per time and the control method utilized; **(9/13)**
 - N. The description of the refractory removal activities; and the estimated quantity of refractory removed on an hourly and annual throughput basis in tons per time and the control method utilized; **(9/13)**
 - O. The number of dust collector replacements from baghouses on annual basis; and **(9/13)**
 - M. The description of the vacuum truck loading activities; the quantity of vacuum truck liquids loading in barrels summed on a rolling twelve-month basis; and the monthly and rolling twelve months hours of operation from vacuum truck solids loading. **(9/13)**
39. The following records shall be maintained at this facility site and made available at the request of personnel from the TCEQ or any other air pollution control program having jurisdiction. These records shall be retained for a rolling 60-month period: **(6/13)**
- A. All monitoring data and support information as specified in 30 TAC § 122.144; and
 - B. Inspections of capture systems and abatement devices shall be recorded as they occur.

Date: November 30, 2022