Renee Lyle

From: PUBCOMMENT-OCC
Sent: Friday, September 29, 2023 10:43 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-APD
Subject: FW: Public comment on Permit Number 19168
Attachments: 2023.9.28_EPA Comments Formosa PSD .pdf

From: ehrhart.jonathan@epa.gov <ehrhart.jonathan@epa.gov>
Sent: Thursday, September 28, 2023 4:30 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 19168

REGULATED ENTY NAME FORMOSA POINT COMFORT PLANT

RN NUMBER: RN100218973

PERMIT NUMBER: 19168

DOCKET NUMBER:

COUNTY: CALHOUN

PRINCIPAL NAME: FORMOSA PLASTICS CORPORATION TEXAS

CN NUMBER: CN600130017

NAME: Jon Ehrhart

EMAIL: ehrhart.jonathan@epa.gov

COMPANY: U.S. Environmental Protection Agency, Region 6

ADDRESS: 1201 ELM ST Suite 500
DALLAS TX 75270-2102

PHONE: 2146652295

FAX:

COMMENTS: Please see attached comments on Amendment of Permit Nos. 140763, PSDTX1500M1, and GHGPSDTX46M1; 19871, PSDTX1236M1, and GHGPSDTX221; 91780, PSDTX1240M1, and GHGPSDTX223; 19200, PSDTX1237M1, and GHGPSDTX218; 19168, PSDTX1226M1, and GHGPSDTX224; 107518, PSDTX1383M2, and GHGPSDTX48M1; 20203, PSDTX1224M1, and GHGPSDTX222; 40157, PSDTX1222M1, and GHGPSDTX225; 19201, PSDTX1232M1, and GHGPSDTX219.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

September 28, 2023

Ms. Laurie Gharis, Chief Clerk
Office of the Chief Clerk
Texas Commission on Environmental Quality (MC 105)
P.O. Box 13087
Austin, TX 78711-3087

Re: Clean Air Act (CAA) New Source Review (NSR) Permits for the Formosa Plastics Corporation Texas, Point Comfort Chemical Complex (Formosa Plant), located in Calhoun County, Texas – Amendment of Permit Nos. 140763, PSDTX1500M1 and GHGPSDTX46M1; 19871, PSDTX1236M1 and GHGPSDTX221; 91780, PSDTX1240M1 and GHGPSDTX223; 19200, PSDTX1237M1 and GHGPSDTX218; 19168, PSDTX1226M1 and GHGPSDTX224; 107518, PSDTX1383M2 and GHGPSDTX48M1; 20203, PSDTX1224M1 and GHGPSDTX222; 40157, PSDTX1222M1 and GHGPSDTX225; 19201, PSDTX1232M1 and GHGPSDTX219.

Dear Ms. Gharis:

On July 26, 2023, the United States Environmental Protection Agency (EPA) received notice of the preliminary permit decisions by the Texas Commission on Environmental Quality (TCEQ) for the nine above-listed NSR permit amendments regarding the "Flare Improvement Project" at the Formosa Plant. We understand that the public notice period (re-notice) for all of the permit amendments was published on August 23, 2023, in the Port Lavaca Wave and on September 18, 2023, in the Revista de Victoria. The comment period ends on October 18, 2023, pursuant to 30 TAC 55.152(a). As part of EPA's oversight responsibilities, we have enclosed our concerns related to the above-referenced permitting actions currently being taken by TCEQ.

We are committed to working with you to ensure that the final permits for the Formosa Plant are consistent with applicable NSR requirements, the EPA-approved Texas air permitting program, and all requirements of federal law. If you have questions or wish to discuss this further, please feel free to contact Jon Ehrhart at (214) 665-2295. Thank you for your cooperation.

Sincerely,

CYNTHIA KALERI

Digitally signed by CYNTHIA KALERI
DN: c=US, o=U.S. Government, ou=Environmental Protection Agency, cn=CYNTHIA KALERI, 0.9.2342.19200300.100.1.1=68001003655411
Date: 2023.09.28 16:12:19 -05'00'

Cynthia J. Kaleri
Air Permits Section Manager

Enclosure

ENCLOSURE

EPA Comments on Multiple TCEQ New Source Review (NSR) Permit Amendments for "Flare Improvement Project" at the *Formosa Plastics Corporation Texas, Point Comfort Chemical Complex*

The following comments pertain to TCEQ Permit Amendment Nos. 140763, PSDTX1500M1 and GHGPSDTX46M1; 19871, PSDTX1236M1 and GHGPSDTX221; 91780, PSDTX1240M1 and GHGPSDTX223; 19200, PSDTX1237M1 and GHGPSDTX218; 19168, PSDTX1226M1 and GHGPSDTX224; 107518, PSDTX1383M2 and GHGPSDTX48M1; 20203, PSDTX1224M1 and GHGPSDTX222; 40157, PSDTX1222M1 and GHGPSDTX225; 19201, PSDTX1232M1 and GHGPSDTX219.

1. **Destruction and Removal Efficiency (DRE) Assumptions Associated with Formosa's Existing Elevated Flares and New Enclosed Ground Flares - Monitoring and Operating Limits to Ensure Compliance with the Hourly and Annual VOC Limits for the Plant's Flares**

As stated in all nine NSR permit applications associated with the Flare Improvement Project (collectively, the "applications"), Formosa has identified that "The sole purpose of the Flare Improvement Project is to achieve compliance with the EPA residual Risk and Technology Review (RTR) regulatory requirements pursuant to recently-promulgated MON and EMACT RTR rulemakings."[1] To that end, EPA understands that Formosa is seeking to amend its air permit authorizations to authorize and install four new non-assisted Enclosed Ground Flares (EPNs: EGF-1, EGF-2, EGF-3, EGF-4) and enhance the existing steam-assisted elevated flare systems (EPNs: 1018, 1067, and OL3-FLRA/B/C). TCEQ's Preliminary Determination Summary (PDS) identifies that annual project emissions for VOC, NOx, and CO are 522 TPY, 291 TPY, and 1,444 TPY respectively – all of which result in Prevention of Significant Deterioration (PSD) review. According to the applications, Formosa is proposing to establish annual emissions caps such that waste gas streams from multiple process areas at the chemical complex are authorized to route to any of the EGFs and/or elevated flares.

All of the above-listed draft NSR permits are proposed to incorporate additional operational and monitoring requirements for flares. For example, the draft NSR Permit No. 19168/PSDTX1236M1 includes Special Conditions 13.a-g which identifies, in part, that the proposed enclosed ground flares and existing elevated flares shall be designed to meet the 40 CFR § 63.670 specifications for minimum combustion zone net heating value (CZNHV), maximum tip velocity, and other various operating and monitoring requirements as required for flares subject to the Ethylene Production MACT final rule (40 CFR part 63, subpart YY).[2] According to the November 29, 2021, amendment applications associated with the Flare Improvement Project, Formosa seeks to continue the attribution of a 99% VOC DRE assumption for C1-C3 VOCs, and 98% DRE for C4+ VOC compounds for its existing steam-assisted flares (EPNs: 1018, 1067, OL3-FLRA/B/C) when estimating lb/hr emission rates and the combined elevated/ground flare TPY emission caps. For the new enclosed ground flares (EPNs: EPNs: EGF-1, EGF-2, EGF-3, EGF-4), Formosa seeks to utilize similar VOC DRE assumptions.

EPA requests that TCEQ provide technical rationale with respect to how the agency determined the appropriateness of the VOC DRE assumptions in these case-by-case NSR permit reviews. TCEQ's acceptance of such destruction efficiencies should be accompanied by supporting technical justification

---

1 *See* Permit No. 19168 (Project 336052), Olefins Plant Permit Amendment Application, Formosa Plastics Corporation, Texas (November 29, 2021) at 4; *See also,* Formosa Permit Amendment Applications for Permit Nos. 19200 (336051), 19201 (336056), 19871 (336049), 20203 (336054), 91780 (336050), 107518 (336053), 140763 (336048), and 401571 (336055) (November 29, 2021) at 4.

2 Similar permit terms are proposed by TCEQ in the eight other concurrent permit amendment actions associated with the Flare Improvement Project.

in the permitting record. Here, EPA could not readily identify any such justification outside of TCEQ's determination that the elevated and enclosed ground flares meet Tier 1 BACT for flares, allowing for the attribution of 99/98% DRE depending on the number of carbon atoms present in the waste gas.

Formosa has asserted and TCEQ has accepted the following VOC DRE assumptions for the enclosed ground flares associated with the Flare Improvement Project.

Summary of November 29, 2021, Application Representations Claiming 99% VOC DRE for Enclosed Ground Flares

Permit & Project No.	Application Area Contribution	Operation	DRE Assumptions	DRE Reference
19168 (336052)	Olefins I/II/FRACII	Routine	99% (C2-C3) 98% (C4+)	TCEQ Flare Guidance
	Olefins I/II	MSS	98.93%	MSS Maximum hourly stream, expected DRE
	FRACII	MSS	98%	TCEQ Flare Guidance
107518 (336053)	OL3 and PDH Plant	Routine	99% (C2-C3) 98% (C4+)	TCEQ Flare Guidance
	OL3	MSS	98.96%	Expected SU/SD Stream Composition
	PDH	MSS	98.88%	Expected SU/SD Stream Composition
19200 (336051)	PPI Plant	Routine	99% (C2-C3) 98% (C4+)	TCEQ Flare Guidance
	PPI Plant	MSS	98.5%	PPI Waste gas DRE
91780 (336050)	PPII Plant	Routine	99% (C2-C3) 98% (C4+)	TCEQ Flare Guidance
	PPII Plant	MSS	99%	PP2 Waste gas DRE (propylene)
19201 (336056)	HDPEI Plant	Routine	99% (C2-C3) 98% (C4+)	TCEQ Flare Guidance
	HDPEI Plant	MSS	98%	TCEQ Flare Guidance
20203 (336054)	LLDPE Plant	Routine	99% (C2-C3) 98% (C4+)	TCEQ Flare Guidance
	LLDPE Plant	MSS	98%	TCEQ Flare Guidance
140763 (336048)	UT3 Plant	Routine	99% (C2-C3) 98% (C4+)	TCEQ Flare Guidance

As listed above, Formosa identifies various references as the source and/or basis for claiming these destruction efficiencies – e.g., TCEQ's flare guidance, expected DRE, and expected stream composition. EPA notes that in addition to the new enclosed ground flares, the elevated steam-assisted flares associated with the project appear to similarly rely on the same flare guidance to claim a 99% VOC DRE for C1-C3 compounds.[3] In apparent agreement with Formosa's attribution of 99% DRE for C1-C3 compounds for all flares, TCEQ states in the control technology review section of the Preliminary Determination Summary that the olefins elevated flares and enclosed ground flares are designed to meet

3 *See, e.g.*, Permit No. 19168 (Project 256588), Agency Review Document – WCC Content ID Number 5589659 (February 26, 2021) at 916, 965, and 966.

the requirements of 60.18, the Ethylene MACT rule, and to achieve destruction efficiency of 99% for compounds up to three carbons and 98% for compounds with greater than three carbons.

With respect to the reference to TCEQ's flare guidance as the basis for the DRE assumptions for the steam-assisted elevated and non-assisted ground flares, it is EPA's understanding that this guidance contains commission-accepted flare destruction efficiencies that allow applicants to claim and apply an assumption of 99% VOC DRE for compounds with three carbons or less and 98% DRE for compounds with greater than 4 carbon atoms when in compliance with 40 CFR 60.18. *See* TCEQ, Air Permits Division NSR Emission Calculations, Attachment A – Flare Factors at 8 (March 2021); *See also* TCEQ 2022 Emissions Inventory Guidelines, RG-360/22, Table A-8 at 143 (January 2023). EPA understands that this guidance is based, in part, on EPA flare studies conducted in the early 1980's.[4] EPA is generally concerned by TCEQ's apparent reliance on flare studies conducted by EPA in the early 1980's as the primary basis for assuming 99% DRE for all flares. As TCEQ is aware, such studies have been expanded by more recent studies that were utilized to support of the development of the Refinery MACT and Ethylene Production MACT. For a list of studies, refer to the technical report titled Parameters for Properly Designed and Operated Flares, in Docket ID No. EPA-HQ-OAR-2010-0682-0191.

EPA has not explicitly identified monitoring or operating requirements within the Ethylene Production MACT rulemaking (which directly applies the petroleum refinery rule flare requirements with clarifications) that can ensure compliant flares will continuously achieve 99% VOC DRE. When in continuous compliance with these regulations, sources can ensure a 98% destruction efficiency to conform with the EMACT standards. However, these regulations were not designed to ensure compliance with 99% DRE for steam-assisted, air-assisted, or non-assisted flares. As EPA explained in its final rule for petroleum refineries:

> Based on the results of all of our analyses, the EPA is finalizing a single minimum NHVcz operating limit for flares subject to the Petroleum Refinery MACT standards of 270 BTU/scf during any 15-minute period. The agency believes, given the results from the various data analyses conducted, that this operating limit is appropriate, reasonable and will ensure that refinery flares meet *98-percent destruction efficiency* at all times when operated in concert with the other suite of requirements refinery flares need to achieve (e.g., flare tip velocity requirements, visible emissions requirements, and continuously lit pilot flame requirements).

80 Fed. Reg. 75211 (December 1, 2015) (emphasis added).

The EPA similarly explained in its proposed rulemaking for the Ethylene Production MACT:

> The Agency believes, given the results from the various data analyses conducted for the Petroleum Refinery Sector Rule, that this NHVcz operating limit promulgated for flares used in the Petroleum Refinery Sector source category is also appropriate, reasonable, and will ensure flares used as APCDs [air pollution control devices] in the Ethylene Production source category *meet 98-percent destruction efficiency* at all times when operated in concert with the other proposed suite of requirements that flares need to comply with (*e.g.,* continuously lit pilot flame requirements, visible emissions requirements, and flare tip velocity requirements) (see the memoranda titled *Petroleum Refinery Sector Rule: Operating Limits for Flares* and *Flare*

4 *See e.g.*, Evaluation of the Efficiency of Industrial Flares: Test Results, EPA-600/2-84-095 (May 1984); Evaluation of the Efficiency of Industrial Flares: Flare Head Design and Gas Composition, EPA-600/2-85-106 (September 1985); Evaluation of the Efficiency of Industrial Flares: H_2S Gas Mixtures and Pilot Assisted Flares, EPA-600/2-86-080 (September 1986).

> *Control Option Impacts for Final Refinery Sector Rule* in Docket ID Nos. EPA-HQ-OAR-2010-0682-0206 and EPA-HQ-OAR-2010-0682-0748, respectively).

84 Fed. Reg. 54298 (October 9, 2019) (emphasis added).

Formosa acknowledges in all of its November 29, 2021, amendment applications that the Ethylene Production MACT and MON RTR requires enhanced flare stream monitoring requirements that exceed TCEQ's VOC Tier I BACT monitoring specifications for flares.[5] However, as identified above, the referenced enhanced monitoring contained in the Ethylene Production MACT was designed to ensure that flares that operate in accordance with such requirements can be assumed to achieve 98% DRE. As EPA further stated in its proposed rulemaking for the EMACT:

> [w]hile the Agency is proposing new operating requirements for flares used as controls in this source category to ensure at least *98-percent* control given that more recent studies have shown that some flares are operating less efficiently than 98-percent control (see section IV.A.1 of this preamble), for purposes of the MACT-allowable risk analysis, we are required to evaluate whether it is necessary to tighten the existing MACT standard and subsequent level of performance a flare is expected to achieve. Thus, weighing all of these factors for flares, we believe that the actual emission levels are a reasonable estimation of the MACT-allowable emissions levels where the performance standards allow the use of a flare as an APCD (e.g., storage vessels, ethylene process vents, equipment leaks, transfer racks, and waste operations).

84 Fed. Reg. 54286 (October 10, 2019) (emphasis added).

TCEQ's technical basis is unclear for authorizing VOC DRE assumptions beyond what the EMACT can ensure through a Tier I VOC BACT determination, which generally relies on the work practices and operational requirements outlined in the 40 CFR § 60.18 general flare requirements. As discussed at length throughout the Petroleum Refinery MACT and Ethylene Production MACT rulemakings, EPA has found that compliance with General Provisions at 40 CFR §§ 60.18(b) and 63.11(b) are inadequate to ensure proper performance of flares at refineries and other petrochemical facilities (including ethylene production units), particularly when either assist steam or assist air is used. See 84 Fed. Reg. 54294 (October 9, 2019) and 79 Fed. Reg 36905 (June 30, 2014).[6] TCEQ's continued acceptance of specific destruction efficiencies should be accompanied by supporting rationale in the permitting record. EPA could not identify any such technical justification outside of TCEQ's determination that the elevated and enclosed ground flares meet Tier 1 BACT for flares, allowing for the attribution of 99/98% DRE depending on the number of carbon atoms present in the waste gas.

As evidenced by the emission calculation representations associated with just the 4,674 lb/hr and 8,612 lb/hr VOC MSS emission caps for the elevated and ground flares in NSR Permit No. 19168, the majority of which appears to be estimated as ethylene emissions, the result of reducing the assumed

---

5 *See e.g.*, Permit No. 19168 (Project 336052), Olefins Plant Permit Amendment Application, Formosa Plastics Corporation, Texas (November 29, 2021) at 37 ("The new EMACT and MON RTR regulations require monitoring of stream flows to flare systems. . . These enhanced flare stream monitoring requirements exceed TCEQ's VOC Tier I BACT monitoring specifications for flares.")

6 EPA made similar findings for flares in the April 6, 2023, proposed amendments to the New Source Performance Standards for the Synthetic Organic Chemical Manufacturing Industry (SOCMI) and the National Emission Standards for Hazardous Air Pollutants that apply to the SOCMI (commonly known as the Hazardous Organic NESHAP or "HON") and Group I and II Polymers and Resins Industries. *See* 88 Fed. Reg. 25147 (April 25, 2023)

destruction efficiency for C2-C3 compounds from 99% to 98% would materially increase the potential estimated emission rates for these flares. Thus, EPA requests additional supporting justification on the following items.

a. Beyond pointing to the operating requirements outlined in the Ethylene Production MACT, EPA requests that TCEQ explain in detail (for each type of flare) what monitoring and/or operating limits/assumptions the commission relied on to authorize 99% DRE, whether compliance with these assumptions is practically enforceable, and what data the commission reviewed to ensure that the proposed operating limits can ensure that both the assisted and non-assisted flares will continuously achieve 99% VOC DRE in practice. According to the application and draft permit, both the elevated and enclosed ground flares associated with the flare improvement project are required to maintain the minimum flare combustion zone net heating value (CZNHV) specified in 40 CFR § 63.670(e).[7] If TCEQ is relying on the combustibility of vent gas and/or vent gas and assist media mixture in excess of this minimum heating value to claim 99% VOC DRE for all waste streams, EPA encourages TCEQ to disclose such a determination, make the minimum Btu values enforceable limitations in the permit, and provide supporting rationale for the applied operating limits.

b. To the extent that TCEQ relies on its own flare guidance to determine the appropriateness of the DRE assumptions, EPA R6 requests that TCEQ explain in detail what technical information it reviewed to approve 99% DRE for both the new enclosed ground flares and modified elevated flares that ensures they will continuously achieve the represented destruction deficiency and that actual emissions will be below permitted limits. To the extent that TCEQ expanded its evaluation beyond acceptance of its own agency-approved DRE assumptions, EPA requests that TCEQ explain its evaluation of technical documentation of Formosa's proposed flares when the agency determined, as stated in the PDS, that both the elevated and ground flares are designed to achieve 99% C1-C3 DRE. In addition, to the extent that TCEQ relied on any project-specific vendor engineering assessments, testing, or guarantees for the flares, EPA requests that TCEQ provide such information and explain how it impacted TCEQ's decision to authorize 99% DRE for each type of flare.

c. Lastly, absent specific technical rationale supporting the current DRE assumptions, TCEQ should re-evaluate whether additional requirements (e.g., minimum NHVcz limit > 270 Btu/scf) are necessary to ensure 99% DRE as represented for both the steam-assisted elevated flares and non-assisted EGFs. In addition to providing more robust supporting rationale, TCEQ should ensure that any final permits include monitoring, recordkeeping, and operational limits that are sufficient to ensure continuous compliance and practical enforceability with the assumed flare DRE and resulting emission limitations.

2. Destruction and Remove Efficiency Assumptions Not Specified

Although the applications identify a range of assumed DRE's for each type of flare, these application representations do not appear to be incorporated by reference or plainly stated on the face of all NSR

---

7 In addition, EPA R6 understands that flare limit-compliance will rely on CPMS pursuant to 40 CFR § 63.671. *See* Permit No. 19168 (Project 336052), Olefins Plant Permit Amendment Application, Formosa Plastics Corporation, Texas (November 29, 2021) at 35 ("[T]he new EGF flare systems are not physically designed to accommodate stack testing of the flare flue gas stream. Therefore, no additional stack testing will be required as a result of the current project.")

permits associated with this action. It appears that the DRE assumptions are being relied upon to calculate the emissions from the flares. For the allowable emission limitations to be federally enforceable in accordance with 40 CFR § 51.166(b)(16), in addition to adequate monitoring, recordkeeping, and reporting, the assumed destruction efficiencies should be included in the permit as an enforceable permit condition. EPA appreciates that Special Condition 5 of draft NSR Permit 19200/PSDTX1237M1 identifies that each flare shall operate with no less than 98 percent efficiency in the removal of organic compounds with over three carbons and 99 percent efficiency for compounds with three or less carbons. However, EPA requests that TCEQ ensure all other NSR permits associated with the flare improvement project that authorize elevated and enclosed ground flares similarly incorporate the approved destruction efficiencies.

3. Enforceability of Multiple lb/hr and tpy Emission Caps for Common Enclosed Ground Flares and Elevated Flares

Permit terms and conditions must be considered federally enforceable as required by 40 CFR § 52.21(b)(17). To be federally enforceable, the permit must contain the method to determine compliance including appropriate monitoring, record keeping, and reporting for the time period of the limitation (hourly and annually). All emission limits must be indicated precisely for each emission point or operation. The permit should state how compliance with each limitation will be determined, and include, but is not limited to, the test method(s) approved for demonstrating compliance.

Each of the PSD permits at review contains operating conditions and emission limitations for the elevated flares (1018, 1067, OL3-FLRA, OL3-FLRB, and OL3-FLRC) and enclosed ground flares (EGF-1, EGF-2, EGF-3, EGF-4). In addition, each of these PSD permits establish short term emission limitations and annual emission caps for the flares for routine operation - seven of which establish an annual emission cap for maintenance, startup, and shutdown emissions. As shown in the table below, the result is that the flares covered by these PSD permits appear to have 18 individual and distinct emission caps. For example, 91780 / PSDTX1240M1 identifies the maximum MSS VOC lb/hr limit for EPN EGF-1 at 717.49 lb/hr while permit 107518 / PSDTX1383M2 imposes a maximum MSS VOC lb/hr limit of 5,372 lb/hr for the same flare. As a practical matter, EPA requests that TCEQ explain in detail how Formosa is able to determine, at any given time, which plant or combination of process areas are contributing to each individual flare and how compliance with each distinct limit is independently determined and ensured.

Summary of Draft PSD Permit MAERT Emission Rates for Flares

Flare Group*	Routine or MSS	Permit No.	lb/hr VOC	TPY VOC
Elevated	Routine – Olefins 1	19168	3.04	-
Elevated	MSS – Olefins 1	19168	8,603.67	-
EGF	Routine– Olefins 1	19168	3.04	-
EGF	MSS – Olefins 1	19168	4,674	-
Elevated and EGF	Routine – Olefins 1	19168	-	13.37
Elevated	Routine – Olefins 2 and FRACII	19168	1.89	-
Elevated	MSS – Olefins 2 and FRACII	19168	13,684.37	-
EGF	Routine – Olefins 2 and FRACII	19168	1.89	-
EGF	MSS – Olefins 2 and FRACII	19168	4,674	-
Elevated and EGF	MSS – Olefins 1, Olefins 2 and FRACII	19168	-	552.98
Elevated and EGF	Routine – Olefins 2 and FRACII	19168	-	8.35
Elevated and EGF	Routine	140763	15.02	0.01
Elevated and EGF	Routine	107518	34.08	95.14
EGF	MSS	107518	5,372	-
Elevated	MSS	107518	5,057.15	-

Elevated and EGF	MSS	107518	-	321.37
Elevated	Routine	19200	12.47	-
EGF	Routine	19200	12.45	-
Elevated and EGF	MSS	19200	949.97	39.05
Elevated and EGF	Routine	19200	-	18.48
Elevated and EGF	Routine	19201	13.74	36.10
Elevated and EGF	MSS	19201	243.20	16.70
Elevated	Routine	19871	0.11	-
EGF	Routine	19871	0.10	-
Elevated and EGF	Routine	19871	-	0.06
Elevated and EGF	Routine	20203	65.07	6.39
Elevated and EGF	MSS	20203	1303.70	14.93
Elevated	Routine	40157	4.75	-
EGF	Routine	40157	4.55	-
Elevated and EGF	Routine	40157	-	20.81
Elevated and EGF	MSS	40157	699.88	7.72
Elevated	Routine	91780	15.16	-
EGF	Routine	91780	15.13	-
Elevated	Product Transition	91780	116.28	-
EGF	Product Transition	91780	116.27	-
Elevated	MSS	91780	718.09	-
EGF	MSS	91780	717.49	-
Elevated and EGF	Routine	91780	-	10.83
Elevated and EGF	Product Transition	91780	-	6.58
Elevated and EGF	MSS	91780	-	22.06

* Elevated Flare refers to the grouping of EPNs 1018, 1067, OL3-FLRA, OL3-FLRB, and OL3-FLRC; and EGF refers to the grouping of EPNs EGF-1, EGF-2, EGF-3, and EGF-4.

6

TCEQ Registration Form

February 2, 2023

Formosa Plastics Corporation Texas
Proposed Amendment to Permit Nos. 140763 et al.

PLEASE PRINT

Name: Kris Leabo

Mailing Address: 912 Nueces

Physical Address (if different): _____

City/State: Port Lavaca TX **Zip:** 77979

This information is subject to public disclosure under the Texas Public Information Act*

Email: kris.lightyear@gmail.com

Phone Number: ( )

- Are you here today representing a municipality, legislator, agency, or group? ☐ Yes ☒ No

  If yes, which one? _____

☐ **Please add me to the mailing list.**

☒ **I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.**

☐ **I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.**

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

From:	PUBCOMMENT-OCC
To:	PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-APD
Subject:	FW: State Air Quality Permits 140763, 19871, 91780,19200,19168, 107518, 20203, 40157, 19201
Date:	Friday, February 3, 2023 2:07:18 PM

From: CHIEFCLK <chiefclk@tceq.texas.gov>
Sent: Friday, February 3, 2023 10:31 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: State Air Quality Permits 140763, 19871, 91780,19200,19168, 107518, 20203, 40157, 19201

Laurie Gharis
Office of the Chief Clerk
Texas Commission on Environmental Quality
Office Phone: 512-239-1835
Cell Phone: 512-739-4582

How is our customer service? Fill out our online customer satisfaction survey at:
www.tceq.texas.gov/customersurvey

From: Sandra McKenzie <sandra@hardymckenzie.com>
Sent: Thursday, February 2, 2023 6:27 PM
To: CHIEFCLK <chiefclk@tceq.texas.gov>
Cc: wilsonalamobay@aol.com
Subject: State Air Quality Permits 140763, 19871, 91780,19200,19168, 107518, 20203, 40157, 19201

TO CHIEF CLERK AND TO WHOM IT MAY CONCERN, TCEQ.TEXAS.GOV

Please accept this email as my objection to your granting permits allowing Formosa Plastic to increase emissions.

Further, it is my strong recommendation that if the permits are granted, that the government require funds be set aside by the company to pay for surprise, unscheduled independent monitoring and independent stationary monitoring of toxic emissions, including but not limited to EDC and VCM. The monitoring should be performed by independent third party experts selected by TCEQ, Sierra Club and/or Audubon and/or organizations involved in protecting public health and the environment.

Funding should be set aside by Formosa to pay for independent monitoring of emissions as well as particles of incomplete combustion and flaring. The monitoring could include in person sampling and

testing as well as video, audio monitoring. Further the company should be required to conduct appropriate human and animal testing to determine whether emissions have caused health effects to the human and animal pullulations.

The tests results and methods should be made available to the public so as to verify that the methods and analysis meets scientific standards.

Independent monitoring is required and requested due to Formosa's history of violating the environmental laws of the United States and the State of Texas.

Sandra L. Hardy McKenzie
HARDY MCKENZIE LAW
Attorney at Law
sandra@hardymckenzie.com
205 S. Main
Victoria, Texas 77901
(361) 570-8299 (main)
(361) 570-8297 (fax)

From:	PUBCOMMENT-OCC
To:	PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-APD
Subject:	FW: State Air Quality Permits 140763, 19871, 91780,19200,19168, 107518, 20203, 40157, 19201
Date:	Friday, February 3, 2023 2:08:32 PM

From: CHIEFCLK <chiefclk@tceq.texas.gov>
Sent: Friday, February 3, 2023 10:32 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: State Air Quality Permits 140763, 19871, 91780,19200,19168, 107518, 20203, 40157, 19201

Laurie Gharis
Office of the Chief Clerk
Texas Commission on Environmental Quality
Office Phone: 512-239-1835
Cell Phone: 512-739-4582

How is our customer service? Fill out our online customer satisfaction survey at:
www.tceq.texas.gov/customersurvey

From: Sandra McKenzie <sandra@hardymckenzie.com>
Sent: Thursday, February 2, 2023 6:34 PM
To: CHIEFCLK <chiefclk@tceq.texas.gov>
Cc: wilsonalamobay@aol.com
Subject: RE: State Air Quality Permits 140763, 19871, 91780,19200,19168, 107518, 20203, 40157, 19201

I also recommend and request that the independent monitoring requested by evaluated and approved by Diane Wilson or an organization she approves, such as River Keepers.

I am a resident of Victoria, Texas.

Sandra Hardy McKenzie

From: Sandra McKenzie
Sent: Thursday, February 02, 2023 6:30 PM
To: 'chiefclk@tceq.texas.gov' <chiefclk@tceq.texas.gov>
Cc: 'wilsonalamobay@aol.com' <wilsonalamobay@aol.com>
Subject: State Air Quality Permits 140763, 19871, 91780,19200,19168, 107518, 20203, 40157, 19201

TO CHIEF CLERK AND TO WHOM IT MAY CONCERN, TCEQ.TEXAS.GOV

Please accept this email as my objection to your granting permits allowing Formosa Plastic to increase emissions.

Further, it is my strong recommendation that if the permits are granted, that the government require funds be set aside by the company to pay for surprise, unscheduled independent monitoring and independent stationary monitoring of toxic emissions, including but not limited to EDC and VCM. The monitoring should be performed by independent third party experts selected by TCEQ, Sierra Club and/or Audubon and/or organizations involved in protecting public health and the environment.

Funding should be set aside by Formosa to pay for independent monitoring of emissions as well as particles of incomplete combustion and flaring. The monitoring could include in person sampling and testing as well as video, audio monitoring. Further the company should be required to conduct appropriate human and animal testing to determine whether emissions have caused health effects to the human and animal pullulations.

The tests results and methods should be made available to the public so as to verify that the methods and analysis meets scientific standards.

Independent monitoring is required and requested due to Formosa's history of violating the environmental laws of the United States and the State of Texas.

Sandra L. Hardy McKenzie
HARDY MCKENZIE LAW
Attorney at Law
sandra@hardymckenzie.com
205 S. Main
Victoria, Texas 77901
(361) 570-8299 (main)
(361) 570-8297 (fax)

(1)

TCEQ Registration Form

February 2, 2023

Formosa Plastics Corporation Texas
Proposed Amendment to Permit Nos. 140763 et al.

PLEASE PRINT

Name: Robin Schneider

Mailing Address: POBox 42278

Physical Address (if different): _____

City/State: Austin TX **Zip:** 78704

This information is subject to public disclosure under the Texas Public Information Act*

Email: robin@texasenvironment.org

Phone Number: ( )

- Are you here today representing a municipality, legislator, agency, or group? ☒ Yes ☐ No

  If yes, which one? Texas Campaign for the Environment

☒ **Please add me to the mailing list.**

☒ **I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.**

☐ **I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.**

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

Misty Botello

From: PUBCOMMENT-OCC
Sent: Monday, August 21, 2023 3:44 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-APD
Subject: FW: Public comment on Permit Number 19201

PM

From: wilsonalamobay@aol.com <wilsonalamobay@aol.com>
Sent: Monday, August 21, 2023 12:09 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number 19201

REGULATED ENTY NAME FORMOSA POINT COMFORT PLANT

RN NUMBER: RN100218973

PERMIT NUMBER: 19201

DOCKET NUMBER:

COUNTY: CALHOUN

PRINCIPAL NAME: FORMOSA PLASTICS CORPORATION TEXAS

CN NUMBER: CN600130017

NAME: Diane Wilson

EMAIL: wilsonalamobay@aol.com

COMPANY: San Antonio Bay Estuarine Waterkeeper

ADDRESS: 600 RAMONA RD
SEADRIFT TX 77983-4203

PHONE: 3612182353

FAX:

COMMENTS: I am requesting a public meeting for this permit

(27)

TCEQ Registration Form

February 2, 2023

Formosa Plastics Corporation Texas
Proposed Amendment to Permit Nos. 140763 et al.

PLEASE PRINT

Name: Diane W. Wilson

Mailing Address: 6000 Ramada Rd

Physical Address (if different): See

City/State: Seadrift, Tex **Zip:** 77983

This information is subject to public disclosure under the Texas Public Information Act

Email: wilsonrlemoke@aol.com

Phone Number: (361) 218-2353

- Are you here today representing a municipality, legislator, agency, or group? ☐ Yes ☐ No

  If yes, which one? San Antonio Bay Estuarine Waterkeeper

☑ **Please add me to the mailing list.**

☐ **I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.**

☐ **I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.**

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.

(3)

TCEQ Registration Form

February 2, 2023

Formosa Plastics Corporation Texas
Proposed Amendment to Permit Nos. 140763 et al.

PLEASE PRINT

Name: Fredrick b Woodland

Mailing Address: 30790 -St HWy 172 Port Lavaca, TX 77979

Physical Address (if different): _____

City/State: Port Lavaca, TX 77979 **Zip:** 77979

This information is subject to public disclosure under the Texas Public Information Act

Email: flw@lavaca.net

Phone Number: (361) 920 1526

- Are you here today representing a municipality, legislator, agency, or group? ☐ Yes ☒ No

  If yes, which one? _____

☐ **Please add me to the mailing list.**

☑ **I wish to provide formal *ORAL COMMENTS* at tonight's public meeting.**

☐ **I wish to provide formal *WRITTEN COMMENTS* at tonight's public meeting.**

(Written comments may be submitted at any time during the meeting)

Please give this form to the person at the information table. Thank you.