

## Plain Language Summary for New Source Review (NSR) Initial Application for Air New Source Review Permit Number 169454

*The following summary is provided for this pending air permit application being reviewed by the Texas Commission on Environmental Quality as required by 30 Texas Administrative Code Chapter 39. The information provided in this summary may change during the technical review of the application and are not federal enforceable representations of the permit application.*

Kao Specialties Americas LLC (KSA) (CN606031466) has submitted an application for initial permit number 169454. The Pasadena Facility (RN111523023) will produce/manufacture TA Products at 5103 Underwood Road, Pasadena, Harris County.

This permit will authorize the TA Plant that will catalytically react raw materials to produce TA products. These products are used for home care detergent or industrial microbicide, household industrial cleaners, agrochemicals, and wood preservatives. KSA has listed in the application the pollutants and amounts that will be emitted for each facility. Below is the total amount for each pollutant that is proposed to be emitted each year for all the facilities.

<b>Pollutant</b>	<b>Proposed Emissions (tons per year)</b>
VOC	14.19
NO <sub>x</sub>	1.24
CO	3.28
PM <sub>10</sub>	0.63
PM <sub>2.5</sub>	0.63
SO <sub>2</sub>	0.33
Ammonia	0.24
Formaldehyde	0.01
Other Miscellaneous HAPs	0.40

The TA Plant will employ emissions controls to minimize pollutant emissions to the air. Controls will include a Hot Oil Boiler (to combust VOC-laden waste gas) and an associated Selective Catalytic Reduction (SCR) unit to control emissions of combustion NO<sub>x</sub> from the Hot Oil Boiler. 2 package steam boilers will utilize ultra-Low NO<sub>x</sub> burners (ULNBs). The cooling water tower will be controlled for VOC via monthly monitoring and for PM<sub>10</sub>/PM<sub>2.5</sub> via a drift eliminator. The site will implement TCEQ's 28VHP LDAR monitoring program to control fugitive emissions from process pipeline leaks. Finally, the 4 emergency use engines (2 diesel-fired fire water pumps and 2 natural gas-fired electric generators) will be EPA-certified to minimally emit combustion pollutants.