

## Plain Language Summary for New Source Review (NSR) Amendment 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 America LLC (KSA) (CN606031466) has submitted an “as built” permit amendment application to modify TCEQ Permit Number 169454. The Bluebonnet Project (RN111523023) will produce/manufacture Tertiary Amine (TA) products at 5103 Underwood Road, Pasadena, Harris County, TX.

This “as built” amendment will authorize the TA Plant. The plant will catalytically react raw materials to produce TA products. These products will be 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.

Pollutant	Permitted Emissions (tons per year)	Emissions Added/Removed (tons per year)	Total Proposed Emissions (tons per year)
VOC	14.19	6.69	20.88
NOx	1.24	- 0.09	1.15
CO	3.28	- 0.12	3.16
PM <sub>10</sub>	0.63	0.14	0.77
PM <sub>2.5</sub>	0.63	0.14	0.77
SO <sub>2</sub>	0.33	0.91	1.24
Ammonia	0.24	- 0.03	0.21
Formaldehyde	0.01	0.0	0.01
Other Miscellaneous HAPs	0.40	- 0.03	0.37

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 NOx from the Hot Oil Boiler. Two package steam boilers will utilize ultra-Low NOx burners (ULNBs). The two small cooling water towers 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. In addition to this LDAR program, the site will implement 28CNTA for connectors. Finally, the three emergency-use engines (two diesel-fired fire water pumps and one natural gas-fired electric generator) will be EPA-certified to minimally emit combustion pollutants.