

From: [Jonathan Walling](#)
To: [REDACTED]
Cc: [Solmer Stine, Julie S](#); [Holloway, Don](#); [Crawford, Gerald W](#); [OCE](#)
Subject: Bayport Polymers DLX Stack Testing Extension Request
Date: Thursday, April 16, 2020 9:31:44 AM
Attachments: [image001.png](#)
[Mar2020 DLX Stack Testing Extension Request.pdf](#)

Good morning, Ms. Allison:

The TCEQ will exercise enforcement discretion for Equistar Chemicals, LP – Bayport Polymers Plant to extend stack and vent testing, required by 30 TAC 115.725(a)(5), for EPNs 152, 154, 153, D-2501, S-2501, V-2507 and vent 153. This enforcement discretion is valid until June 20, 2020. The testing shall be in accordance with the appropriate EPA methods and conducted and as soon as practicable before this date, as conditions allow. Should an extension beyond this date be needed, please re-submit your request.

Regulated entities must maintain records adequate to document activities related to any noncompliance under enforcement discretion, including details of the regulated entity's best efforts to comply.

Regards,

Jonathan Walling, Area Director
Coastal & East Texas Area Director
Texas Commission on Environmental Quality

From: Allison, Jolanda R <[REDACTED]>
Sent: Thursday, April 9, 2020 3:05 PM
To: OCE <OCE@tceq.texas.gov>; Ramiro Garcia <ramiro.garcia@tceq.texas.gov>
Cc: Solmer Stine, Julie S <[REDACTED]> Holloway, Don <[REDACTED]> Crawford, Gerald W <[REDACTED]>
Subject: Bayport Polymers DLX Stack Testing Extension Request

Equistar Chemicals, LP – Bayport Polymers Plant (Equistar) is requesting to extend the date to conduct the stack testing of the D-Line/DLX process unit to establish the quantity of air contaminants and compliance demonstration with the HRVOC rule [30 TAC 115.725(a)(6)(B)] at increased production rates. See the attached letter sent to the TCEQ Region 12 office. This extension request is due to the COVID-19 pandemic and the limited internal and external resources required to conduct this testing. In addition, the plant is operating at low production rates for inventory control. Equistar is requesting until July 20, 2020 to conduct this testing assuming that normal operations and work schedules are allowed to resume by that time. Should resources become available and operating rates return to levels necessary to perform the testing earlier, Equistar will make our best efforts to perform the testing as soon as feasible.

Please feel free to contact me if you have any questions or concerns regarding this matter. Thank you for your consideration!

Jolanda Allison
Principal Environmental Engineer

Bayport Complex
10801 Choate Rd.
Pasadena, TX 77507
Office: (281)291-1163
Mobile: (281)804-0919



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March 30, 2020

Air Section Manager
Texas Commission on Environmental Quality (TCEQ) – Region 12
5425 Polk St., Ste. H
Houston, Texas 77023-1452
Certified Mail Receipt No. 7017 3380 0000 7557 6090

Re: Extension Request for DLX Stack Testing
Equistar Chemicals, LP - Bayport Polymers Plant
Regulated Entity No. RN100216761
Customer Reference No. CN600124705
TCEQ Account No. HG-0323-M

Dear Sir or Madam:

Equistar Chemicals, LP – Bayport Polymers Plant (Equistar) is submitting a request to extend the date by 90 days to conduct the stack testing of the Bulk Plant D-Line/DLX process unit. Equistar submitted the initial stack test notification via letter dated February 19, 2020 with a testing date after April 4, 2020. This extension request is based on the limited access of internal and third-party resources (i.e. Alliance Source Testing) needed to conduct the testing due to the COVID-19 pandemic.

The emission sources will be tested to establish the air contaminants and quantities emitted to the atmosphere along with demonstrating compliance with the HRVOC regulation. The stack testing will occur no earlier than May 15, 2020 and no later than July 20, 2020. A follow up communication will be provided when the specific testing dates are determined based on the production schedule and the schedule for Alliance Source Testing.

Attached is a listing of expected testing sources. The final listing of the testing points as well as the specific vendor test plan will be submitted in April 2020.

Please feel free to contact Jolanda Allison via email at [REDACTED] or phone at (281) 291-1163 if you have any questions regarding this submittal.

Sincerely,

Gerald Crawford
Environmental Manager
LyondellBasell Bayport Complex

Equistar Chemicals, LP
12001 Bay Area Blvd
Pasadena, Texas 77507

Tel +1 281 604 3800
Fax +1 281 604 3430
lyondellbasell.com

cc: Director
Harris County Pollution Control Services Department
101 S. Richey, Suite H
Pasadena, TX 77506
Certified Mail Receipt No. 7017 3380 0000 7557 6106

Environmental Department Files

Preliminary 2020 DLX Stack Testing Scope

1.0 General Scope

Stack testing will be conducted to establish the air contaminants and quantities emitted to the atmosphere along with demonstrating compliance with the HRVOC regulation. Testing will be conducted on vents downstream of the polymer process dryer for the D-Line/DLX process unit.

To the extent our production schedules allow, Equistar intends to conduct the testing during maximum product production rates and products which could potentially contain the highest concentration of emissions at each applicable vent. Please note, however, that this testing may occur at different times due to production schedules and unit operations.

2.0 Summary of Emission Sources to be Tested

The following EPNs (emission point numbers) will be tested using EPA Methods 1, 2, 3, 4, 18, and 25A for HRVOC and VOC emissions:

- EPN: 152 – DLX Centralized Vent System Bagfilter (S-2580)
- EPN: 154 – DLX Pellet Railcar Loading Bagfilter (F-4842)

The following EPNs will be tested using EPA Methods 1, 2, 3, 4, 5, 18, and 25A for PM, HRVOC, and VOC emissions:

- EPN: 153 – DLX Pellet Silos (D-4801, D-4802 and D-4803)
- EPN : D-2501– DLX Pellet Spin Dryer
- EPN : S-2501 – DLX Classifier
- EPN: V-2507 – DLX Production Hopper

3.0 Identical Vents

The following vents are identical and at least 50% will be tested.

EPN: 153 – DLX Pellet Silos (D-4801, D-4802, and D-4803)

Downstream of the DLX extruder are three (3) pellet storage silos. The DLX pellets are routed to one (1) of the three (3) silos prior to loading into a railcar. Only one (1) silo can be filled at a time and each silo is equipped with an atmospheric vent. All three (3) silos are of identical design and receive product from the same source. Two (2) of the three (3) pellet silos will be tested.