



**INVISTA**™

**CERTIFIED MAIL -- 9405503699300209165998  
RETURN RECEIPT REQUESTED**

**INVISTA S.à r.l.**  
Victoria Site  
P. O. Box 2626  
Victoria, TX 77902-2626

361.572.1111  
www.invista.com

December 10, 2015

Ms. Melanie Magee  
United States Environmental Protection Agency, Region 6  
1445 Ross Avenue, Suite 1200 (Mail Code: 6MM)  
Dallas, Texas 75202-2733

**RE: Request for Rescission of Permit No. PSD-TX-812-GHG**  
INVISTA S.à r.l. – Victoria, TX  
West Powerhouse Facility  
RN102663671; CN602582231

RECEIVED  
15 DEC 14 PM 4: 13  
AIR PERMITS SECTION  
6PD-R

Dear Ms. Magee:

Pursuant to 40 C.F.R. § 52.21(w)(2)(iii), INVISTA S.à r.l. (INVISTA) is hereby requesting that United States Environmental Protection Agency, Region 6 (EPA) rescind Permit PSD-TX-812-GHG, which was issued to INVISTA on May 14, 2013, for the INVISTA Victoria Site West Powerhouse Facility (WPH) Boiler Numbers 1, 2, 3 and 4 Refurbishment Project. Included with this request is a copy of the amendment to Texas Commission on Environmental Quality (TCEQ) Permit No. 812 issued by TCEQ for the WPH Boilers Refurbishment Project along with TCEQ's Source Analysis & Technical Review. (See Attachments 1 and 2, respectively).

According to 40 C.F.R. § 52.21(w)(2)(iii), a permit holder may request that EPA rescind a prevention of significant deterioration (PSD) permit if it was issued for a modification that was classified as a major modification solely on the basis of an increase in emissions of greenhouse gases (GHGs).

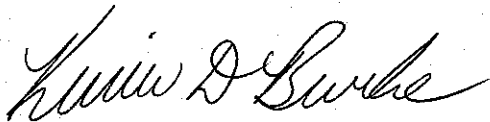
As documented in TCEQ's Source Analysis and Technical Review for the amendment of TCEQ Permit 812 (See Attachment 2) and Special Condition No. 24 of the permit (See Attachment 1), the refurbishment and addition of emission controls did not result in significant emissions increases of nitrogen oxides (NOx), volatile organic

compounds (VOC), carbon monoxide (CO), particulate matter (PM) or sulfur dioxide (SO<sub>2</sub>) and, thus, did not constitute a major modification for any non-GHG pollutant. Therefore, the project was subject to TCEQ's minor new source review permitting program and authorized through a minor amendment to TCEQ Permit No. 812. Accordingly, PSD Permit No. PSD-TX-812-GHG is no longer required.

I hereby certify that Permit PSD-TX-812-GHG is not being used, or planned to be used, for any regulatory compliance or enforcement purposes, and that the information contained in this request is factual and correct.

If you have any questions or comments, please contact Lance Thomasson at (361) 572-2317 or [lance.e.thomasson@invista.com](mailto:lance.e.thomasson@invista.com).

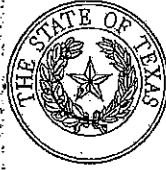
Sincerely,

A handwritten signature in cursive script that reads "Kevin D. Burke".

Kevin D. Burke  
Victoria Site Manager

KDB/let

Bryan W. Shaw, Ph.D., *Chairman*  
Carlos Rubinstein, *Commissioner*  
Toby Baker, *Commissioner*  
Zak Covar, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY  
*Protecting Texas by Reducing and Preventing Pollution*

April 26, 2013

MR STEPHEN W HARVILL  
PLANT MANAGER  
INVISTA SARL  
PO BOX 2626  
VICTORIA TX 77902-2626

Re: Permit Amendment Application  
Permit Number: 812  
Victoria West Powerhouse  
Victoria, Victoria County  
Regulated Entity Number: RN102663671  
Customer Reference Number: CN602582231  
Account Number: VC-0008-Q

Dear Mr. Harvill:

This is in response to your letter received April 30, 2012 and your Form PI-1 (General Application for Air Preconstruction Permits and Amendments) concerning the proposed amendment to Permit Number 812. We understand that you propose to add Selective Non-Catalytic Reduction (SNCR) and low NOx burners to all four of the West Powerhouse boilers (this will be a phased project occurring through 2017); modify the boilers, including retubing, rebuilding, and other improvements and modernization; revise waste fuel flow rates and associated allowable emission rates, to ensure adequate operational flexibility; and make physical changes to the fuel piping system. Also, this will acknowledge that your application for the above-referenced amendment is technically complete as of February 20, 2013.

As indicated in Title 30 Texas Administrative Code § 116.116(b) and § 116.160 [30 TAC § 116.116(b) and § 116.160], and based on our review, Permit Number 812 is hereby amended. In addition, with this permitting action, Permit by Rule Registration Number 93789 has been voided. This information will be incorporated into the existing permit file. Enclosed are revised special conditions pages, a maximum allowable emission rates (MAERT) table, and a new permit face to replace those currently attached to your permit. We appreciate your careful review of the special conditions of the permit and assuring that all requirements are consistently met.

Planned maintenance, startup, and shutdown emissions have been previously reviewed, authorized, and included in the MAERT. Any other maintenance activities are not authorized by this permit and will need to obtain a separate authorization.

Mr. Stephen W Harvill

Page 2

April 26, 2013

Re: Permit Number: 812

This amendment will be automatically void upon the occurrence of any of the following, as indicated in 30 TAC § 116.120(a):

1. Failure to begin construction of the changes authorized by this amendment within 18 months from the date of this authorization.
2. Discontinuance of construction of the changes authorized by this amendment for a period of 18 consecutive months or more.
3. Failure to complete the changes authorized by this amendment within a reasonable time.

Upon request, the executive director may grant extensions as allowed in 30 TAC § 116.120(b).

You may file a **motion to overturn** with the Chief Clerk. A motion to overturn is a request for the commission to review the executive director's decision. Any motion must explain why the commission should review the executive director's decision. According to 30 TAC § 50.139, an action by the executive director is not affected by a motion to overturn filed under this section unless expressly ordered by the commission.

A motion to overturn must be received by the Chief Clerk within 23 days after the date of this letter. An original and 11 copies of a motion must be filed with the Chief Clerk in person, or by mail to the Chief Clerk's address on the attached mailing list. On the same day the motion is transmitted to the Chief Clerk, please provide copies to the applicant, the executive director's attorney, and the Public Interest Counsel at the addresses listed on the attached mailing list. If a motion to overturn is not acted on by the commission within 45 days after the date of this letter, then the motion shall be deemed overruled.

You may also request **judicial review** of the executive director's approval. According to Texas Health and Safety Code § 382.032, a person affected by the executive director's approval must file a petition appealing the executive director's approval in Travis County district court within 30 days after the **effective date of the approval**. Even if you request judicial review, you still must exhaust your administrative remedies, which includes filing a motion to overturn in accordance with the previous paragraphs.

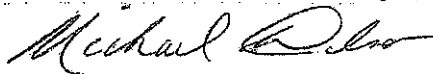
Your cooperation in this matter is appreciated. If you need further information or have any questions, please contact Mr. Sean O'Brien at (512) 239-1137 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Mr. Stephen W Harvill  
Page 3  
April 26, 2013

Re: Permit Number: 812

This action is taken under authority delegated by the Executive Director of the TCEQ.

Sincerely,



Michael Wilson, P.E., Director  
Air Permits Division  
Office of Air  
Texas Commission on Environmental Quality

MPW/so

Enclosures

cc: Air Section Manager, Region 14 - Corpus Christi

Project Number: 177295

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY  
AIR QUALITY PERMIT



*A Permit Is Hereby Issued To*  
**INVISTA S.a r.l.**  
*Authorizing the Construction and Operation of*  
**Victoria West Powerhouse**  
*Located at Victoria, Victoria County, Texas*  
Latitude 28° 40' 41" Longitude 96° 57' 17"

Permit: 812

Amendment Date : April 26, 2013

Renewal Date: July 29, 2020

  
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 116.116 (30 TAC 116.116)]
- 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(a), (b) and (c)]
- 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)(iii)]
- 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; comply with any additional recordkeeping requirements specified in special conditions attached to 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)]
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 for upsets and maintenance 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, regulations, 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 a condition of "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.**

Special Conditions  
Permit Number 812

**Emission Standards, Fuel Specifications, and Work Practices**

1. This permit authorizes emissions only from those emission points listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates," and the facilities covered by this permit are authorized to emit subject to the emission rate limits on that table and other operating requirements specified in the Special Conditions.

Special Condition Nos. 2 through 13 apply to the normal operations of the sources covered under this permit. Special Condition Nos. 14 through 23 apply to the Planned Maintenance, Start-up, and Shutdown activities authorized by this permit.

2. A copy of the permit amendment application submitted April 30, 2012, including supplemental information submitted, shall be kept at the plant site and made available at the request of personnel from the Texas Commission on Environmental Quality (TCEQ) or any air pollution control agency having jurisdiction. **(4/13)**
3. Opacity of emissions from the Emission Point Nos. (EPNs) 15STK-005 and 15STK-006 must not exceed 20 percent averaged over a six-minute period, except for those periods described in the Title 30 Texas Administrative Code (30 TAC) § 111.111(a)(1)(E). Opacity shall be monitored, by a certified observer, for at least one, six minute period in accordance with Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), Appendix A, Test Method 9 once per month. As an alternative, opacity may be monitored using the existing continuous opacity monitoring system (COMS) installed in accordance with 40 CFR Part 60 Appendix B Performance Specification 1.
4. Fuel used in the Adipic (West) Powerhouse (APH) boilers (EPNs 15STK-005 and 15STK-006) shall be limited to liquid and gaseous waste fuels identified in the confidential section of the April 30, 2012 permit amendment application. The firing rate of wastes is limited to the representations in the confidential section of the April 30, 2012, permit amendment application. Pipeline-quality sweet natural gas shall be used in a quantity no greater than what is necessary to obtain maximum heat input as represented in the April 30, 2012, permit amendment application, and any TCEQ approved updates. **(4/13)**

Other material may be added to the above fuels as needed on a short-term basis (i.e., "spiked") to accomplish required stack testing. The TCEQ Regional Office shall be notified at least seven (7) days before any test involving spiking. The use of any other fuel shall require prior approval from the TCEQ.

5. The facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency regulations as follows:
  - A. Title 40 CFR Part 60, Subparts A and D on Standards of Performance for New Stationary Sources promulgated for Fossil Fuel Fired Steam Generators. This applies to Boiler No. 4 only.



B. The following subparts of 40 CFR Part 61:

- (1) A, General Provisions;
- (2) FF, National Emission Standard For Benzene Waste Operations.

C. The following subparts of 40 CFR Part 63:

- (1) A, General Provisions;
- (2) H, National Emission Standards For Organic Hazardous Air Pollutants For Equipment Leaks;
- (3) FFFF, National Emission Standards For Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing; and
- (4) EEE, National Emission Standards For Hazardous Air Pollutants From Hazardous Waste Combustors.

6. Compliance with the particulate matter (PM) emissions limit shall be based upon the combined total for APH Boilers (EPNs 15STK-005 and 15STK 006). The PM emissions will be calculated from the ash analysis and volumes of liquid waste fuels fired. Records of waste stream flows and ash analysis will be maintained. An ash analysis will be performed for all liquid waste streams burned in the boilers quarterly.

**Continuous Demonstration of Compliance**

7. The holder of this permit shall install, calibrate, maintain, and operate a continuous emission monitoring system (CEMS) to measure and record the concentrations of nitrogen oxides (NO<sub>x</sub>) and nitrous oxide (N<sub>2</sub>O) in the Catalytic Abater Stack (EPN 15 CAT-001) and a CEMS to measure and record the concentrations of NO<sub>x</sub> in each Powerhouse Boiler Stack (EPNs 15STK-005 and 15STK-006, each stack shared by a boiler pair or in the duct exiting each boiler). In addition, the holder of this permit shall comply with the following: **(4/13)**
- A. The CEMS shall meet the design and performance specifications, pass the field tests, and meet the installation requirements and data analysis and reporting requirements specified in the applicable Performance Specifications in 40 CFR Part 60, Appendix B.
  - B. The system shall be zeroed and spanned daily and corrective action taken when the 24-hour span drift exceeds two times the amounts specified in 40 CFR Part 60, Appendix B. Each gaseous monitor shall be quality-assured at least quarterly using cylinder gas audits (CGAs). The CGA method to be used is contained in 40 CFR Part 60, Appendix F, Procedure 1.
  - C. The gaseous monitoring data shall be reduced to hourly average concentrations at least once every day, using a minimum of four equally-spaced data points from each one-hour period. At least 23 hourly averages shall be generated per day. The tons per year (TPY) and pounds per hour (PPH) emissions are to be computed on a monthly basis for TPY and a daily basis for pph as a minimum

using calculated flue gas volume for each boiler and measured concentration of pollutants from the CEMS systems.

- D. All CGA exceedances greater than  $\pm 15$  percent accuracy and any unscheduled CEMS downtime lasting four hours or more shall be reported in written form to the TCEQ Regional Office within 24 hours of detection, and necessary corrective action shall be taken. Scheduled repair or replacement work on the CEMS resulting in downtime is exempt from this notification requirement. Supplemental stack concentration measurements may be required at the discretion of the TCEQ Regional Director.
8. Oxygen ( $O_2$ ) and carbon monoxide (CO) concentrations shall be measured in the duct exiting each boiler using CEMS. The CO and  $O_2$  CEMS shall be certified for use by meeting the design and performance specifications and passing the field tests in 40 CFR Part 266, Appendix IX, § 2.0. The  $O_2$  concentrations shall be quantified, recorded, and reported as percent by volume on a dry basis. The CO concentrations shall be quantified, recorded, and reported as parts per million (ppm) by volume. The CO monitoring data shall be reduced to hourly average concentrations at least once every day, using a minimum of four equally-spaced data points from each one-hour period. At least 23 hourly averages shall be generated per day. The TPY and PPH emissions of CO are to be computed on a monthly basis for TPY and a daily basis for pph as a minimum using calculated flue gas volume for each boiler and measured concentration of pollutants from the CEMS systems.
9. The CEMS for CO and  $O_2$  shall be zeroed and spanned daily for each monitoring range on those days when the Boiler Nos. 1, 2, 3, and 4 are in service. Corrective action shall be taken when the 24-hour span drift exceeds two times the amount specified in 40 CFR Part 266, Appendix IX. Each calendar quarter, monitor accuracy shall be certified using a calibration error test as described in 40 CFR Part 266, § 2.1.6.3. Reference method testing can be substituted for CGAs if preferred by the permitted as allowed by 40 CFR Part 266, Appendix IX, § 2.1.10.3. Corrective action shall be taken when the CGA or reference method testing exceeds  $\pm 5$  percent of span as defined in 40 CFR Part 266, Appendix IX, § 2.1.4.7. The CO and  $O_2$  CEMS shall operate at a minimum of 90 percent uptime, based on a 24-hour period. Any unscheduled CEMS downtime lasting four hours or more shall be reported in written form to the TCEQ Regional Office within 24 hours of detection, and necessary corrective action shall be taken. Scheduled repair or replacement work on the CEMS resulting in downtime is exempt from this notification requirement.
10. At least once annually (during the second calendar quarter of each year), conduct the Performance Specification Test (PST) as required by the 40 CFR Part 266, Appendix IX, § 2.1.10.4. These tests shall be conducted using all applicable sections of 40 CFR Part 266, Appendix IX, and all applicable test methods found in 40 CFR Part 60, Appendix A. A relative accuracy test, a calibration error test, a response time test, and a calibration drift test shall be conducted during the PST period in accordance with 40 CFR Part 266, Appendix IX, § 2.1.5. Test results shall be reported and forwarded to the TCEQ Corpus Christi Regional Office no later than 60 days after the last day of testing.

**Piping, Valves, Connectors, Pumps, Agitators, and Compressors - 28VHP**

11. Except as may be provided for in the special conditions of this permit, the following requirements apply to the above-referenced equipment:

- A. These conditions shall not apply (1) where the volatile organic compounds (VOC) have an aggregate partial pressure or vapor pressure of less than 0.044 pound per square inch, absolute (psia) at 68°F or (2) operating pressure is at least 5 kilopascals (0.725 psi) below ambient pressure; or (3) to components in pipeline quality natural gas service. Equipment excluded from this condition shall be identified in a list or by one of the methods described below to be made readily available upon request.

The exempted components may be identified by one or more of the following methods:

- (1) piping and instrumentation diagram (PID);
  - (2) a written or electronic database;
  - (3) color coding;
  - (4) a form of weatherproof identification; or
  - (5) designation of exempted process unit boundaries.
- B. Construction of new and reworked piping, valves, pump systems, and compressor systems shall conform to applicable American National Standards Institute (ANSI), American Petroleum Institute (API), American Society of Mechanical Engineers (ASME), or equivalent codes.
- C. New and reworked underground process pipelines shall contain no buried valves such that fugitive emission monitoring is rendered impractical. New and reworked buried connectors shall be welded.
- D. To the extent that good engineering practice will permit, new and reworked valves and piping connections shall be so located to be reasonably accessible for leak-checking during plant operation. Difficult-to-monitor and unsafe-to-monitor valves, as defined by Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115), shall be identified in a list to be made readily available upon request. The difficult-to-monitor and unsafe-to-monitor valves may be identified by one or more of the methods described in Subparagraph A above. If an unsafe to monitor component is not considered safe to monitor within a calendar year, then it shall be monitored as soon as possible during safe to monitor times. A difficult to monitor component for which quarterly monitoring is specified may instead be monitored annually.
- E. New and reworked piping connections shall be welded or flanged. Screwed connections are permissible only on piping smaller than two-inch diameter. Gas or hydraulic testing of the new and reworked piping connections at no less than operating pressure shall be performed prior to returning the components to service or they shall be monitored for leaks using an approved gas analyzer within

15 days of the components being returned to service. Adjustments shall be made as necessary to obtain leak-free performance. Connectors shall be inspected by visual, audible, and/or olfactory means at least weekly by operating personnel walk-through.

Each open-ended valve or line shall be equipped with an appropriately sized cap, blind flange, plug, or a second valve to seal the line. Except during sampling or other such periods where flow through the valve(s) is necessary for maintenance, both valves shall be closed. If the removal of a component for repair or replacement results in an open ended line or valve, it is exempt from the requirement to install a cap, blind flange, plug, or second valve for 24 hours. If the repair or replacement is not completed within 24 hours, the line or valve must have a cap, blind flange, plug, or second valve installed.

- F. Accessible valves shall be monitored by leak checking for fugitive emissions at least quarterly using an approved gas analyzer. Sealless/leakless valves (including, but not limited to, welded bonnet bellows and diaphragm valves) and relief valves equipped with a rupture disc upstream or venting to a control device are not required to be monitored. For valves equipped with rupture discs, a pressure-sensing device shall be installed between the relief valve and rupture disc to monitor disc integrity. All leaking discs shall be replaced at the earliest opportunity but no later than the next process shutdown.

A check of the reading of the pressure-sensing device to verify disc integrity shall be performed weekly and recorded in the unit log.

The gas analyzer shall conform to requirements listed in Method 21 of 40 CFR Part 60, Appendix A. The gas analyzer shall be calibrated with methane. In addition, the response factor of the instrument for a specific VOC of interest shall be determined and meet the requirements of Section 8 of Method 21. If a mixture of VOCs is being monitored, the response factor shall be calculated for the average composition of the process fluid. If a response factor less than 10 cannot be achieved using methane, then the instrument may be calibrated with one of the VOC to be measured or any other VOC so long as the instrument has a response factor of less than 10 for each of the VOC to be measured.

Replacements for leaking components shall be re-monitored within 15 days of being placed back into VOC service.

- G. Except as may be provided for in the special conditions of this permit, all pump, compressor, and agitator seals shall be monitored with an approved gas analyzer at least quarterly or be equipped with a shaft sealing system that prevents or detects emissions of VOC from the seal. Seal systems designed and operated to prevent emissions or seals equipped with an automatic seal failure detection and alarm system need not be monitored. These seal systems may include (but are not limited to) dual pump seals with barrier fluid at higher pressure than process pressure, seals degassing to vent control systems kept in good working order, or seals equipped with an automatic seal failure detection and alarm system. Submerged pumps or sealless pumps (including, but not limited to, diaphragm,

canned, or magnetic-driven pumps) may be used to satisfy the requirements of this condition and need not be monitored.

- H. Damaged or leaking valves or connectors found to be emitting VOC in excess of 500 parts per million by volume (ppmv) or found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. Damaged or leaking pump, compressor, and agitator seals found to be emitting VOC in excess of 2,000 ppmv or found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. A first attempt to repair the leak must be made within 5 days. Records of the first attempt to repair shall be maintained.
- I. Every reasonable effort shall be made to repair a leaking component, as specified in this paragraph, within 15 days after the leak is found. If the repair of a component would require a unit shutdown that would create more emissions than the repair would eliminate, the repair may be delayed until the next scheduled shutdown. All leaking components which cannot be repaired until a scheduled shutdown shall be identified for such repair by tagging within 15 days of the detection of the leak. A listing of all components that qualify for delay of repair shall be maintained on a delay of repair list. The cumulative daily emissions from all components on the delay of repair list shall be estimated by multiplying by 24 the mass emission rate for each component calculated in accordance with the instructions in 30 TAC § 115.782(c)(1)(B)(i)(II). The calculations of the cumulative daily emissions from all components on the delay of repair list shall be updated within ten days of when the latest leaking component is added to the delay of repair list. When the cumulative daily emission rate of all components on the delay of repair list times the number of days until the next scheduled unit shutdown is equal to or exceeds the total emissions from a unit shutdown as calculated in accordance with 30 TAC § 115.782(c)(1)(B)(i)(I), the TCEQ Regional Manager, and any local programs shall be notified and may require early unit shutdown or other appropriate action based on the number and severity of tagged leaks awaiting shutdown. This notification shall be made within 15 days of making this determination.
- J. Records of repairs shall include date of repairs, repair results, justification for delay of repairs, and corrective actions taken for all components. Records of instrument monitoring shall indicate dates and times, test methods, and instrument readings. Records of physical inspections shall be noted in the operator's log or equivalent.
- K. Alternative monitoring frequency schedules of 30 TAC §§ 115.352 and 115.359 or National Emission Standards for Organic Hazardous Air Pollutants, 40 CFR Part 63, Subpart H, may be used in lieu of Items F through G of this condition.
- L. Compliance with the requirements of this condition does not assure compliance with requirements of 30 TAC Chapter 115, an applicable New Source Performance Standard (NSPS), or an applicable National Emission Standard for

Hazardous Air Pollutants (NESHAPS) and does not constitute approval of alternative standards for these regulations.

### **HCl Scrubber Vessel (9/11)**

12. The water flow to the HCl Scrubber shall be monitored and the monitored results recorded as follows:
  - A. During the unloading of HCl trailers, the minimum water flow to the HCl Scrubber shall be 2 gallons per minute (gpm). Scrubber flow rate shall be recorded within 15 minutes of commencing the unloading operation.
  - B. At all other times the HCl tank is in service, the minimum water flow to the HCl Scrubber shall be 2 gpm. During periods in which trailer unloading is not occurring, the scrubber flow rate shall be recorded at least once per day.

### **Recordkeeping Requirements**

13. The following records shall be made available to representatives of the TCEQ or any pollution control program having jurisdiction upon request. These records shall be kept for five years after the data are obtained. **(4/13)**
  - A. Average hourly NO<sub>x</sub> and CO concentration (ppm) and 30-day rolling average emissions (pph) to demonstrate compliance with Special Condition No. 1 for 15STK 005 and 15STK 006. Average hourly NO<sub>x</sub> and N<sub>2</sub>O concentration (ppm) and 30-day rolling average emissions (pph) to demonstrate compliance with Special Condition No. 1 for 15CAT-001. These records shall be used to show compliance with the MAERT.
  - B. Calculated NO<sub>x</sub> and CO annual emissions (TPY) on a rolling 12-month basis to demonstrate compliance with Special Condition No. 1 for 15STK-005 and 15STK-006. Calculated NO<sub>x</sub> and N<sub>2</sub>O annual emissions (TPY) on a rolling 12 month basis to demonstrate compliance with Special Condition No. 1 for 15CAT-001. These records shall be used to show compliance with the MAERT.
  - C. Fuel usage limitations and waste firing rate limitation will be documented by maintaining records of integrated fuel flow to each boiler, totaled monthly to demonstrate compliance with Special Condition Nos. 1 and 4.
  - D. Records of the total of all liquid waste fuels fired on a monthly basis and computed PM emissions on a rolling 12-month average (TPY) for EPN 15STK-005 and EPN 15STK-006 pursuant to Special Condition No. 6.
  - E. Records of CEMS data including, raw data files of concentrations measured, calibration checks and adjustments, and records of maintenance performed pursuant to Special Condition Nos. 7, 8, 9, 10 and 25. Any CEMS failure in excess of 4 hours shall be reported in written form within 24 hours to the TCEQ Regional Office.
  - F. Applicable records required by the Resource Conservation and Recovery Act may be used to satisfy recordkeeping required by this permit.

- G. Records of opacity observations performed or monitoring data to demonstrate compliance with Special Condition No. 3.
- H. Records of HCl Scrubber flow rates as required by Special Condition No. 12.
- I. Any additional records necessary to demonstrate compliance with the maximum allowable emission rates table including adequate data (measured or calculated) to show the emissions cap for the boilers is met. (4/13)

#### **Planned Maintenance Start-Up and Shutdown**

14. This permit authorizes the emissions from planned maintenance, startup, and shutdown (MSS) activities summarized in the MSS Activity Summary (Attachment C) attached to this permit. (6/11)

This permit authorizes emissions from temporary facilities used to support planned MSS activities at permanent site facilities: frac tanks, containers, vacuum trucks, portable control devices, and controlled recovery systems. Emissions from temporary facilities are authorized provided the temporary facility (a) does not remain on the plant site for more than 12 consecutive months; (b) is used solely to support planned MSS activities at the permanent site facilities listed in this permit, and (c) does not operate as a replacement for an existing authorized facility.

Attachment A identifies the inherently low emitting MSS activities that may be performed at the plant. Emissions from activities identified in Attachment A shall be considered to be equal to the potential to emit represented in the permit application. The estimated emissions from the activities listed in Attachment A must be revalidated annually. This revalidation shall consist of the estimated emissions for each type of activity and the basis for that emission estimate.

Routine maintenance activities, as identified in Attachment B may be tracked through the work orders or equivalent. Emissions from activities identified in Attachment B shall be calculated using the number of work orders or equivalent that month and the emissions associated with that activity identified in the permit application.

Attachment C is a summary of all MSS activities including those on Attachments A and B. MSS activities and associated emissions identified in Attachment C that are not identified in Attachments A or B shall be recorded and include at least the following information:

- A. the process unit at which emissions from the MSS activity occurred, including the emission point number and common name of the process unit;
- B. the type of planned MSS activity and the reason for the planned activity;
- C. the common name and the facility identification number, if applicable, of the facilities at which the MSS activity and emissions occurred;
- D. the date and time of the MSS activity and its duration;
- E. the estimated quantity of each air contaminant, or mixture of air contaminants, emitted with the data and methods used to determine it. The emissions shall be

estimated using the methods identified in the permit application, consistent with good engineering practice.

All MSS emissions shall be summed monthly and the rolling 12-month emissions shall be updated on a monthly basis.

This permit does not authorize MSS activities which are not represented in this permit or in the permit application, form PI-1, dated January 4, 2008. This permit does not authorize emission events, upset emissions, emissions from MSS activities that occur as a result of upsets, or emissions from any unscheduled or unplanned MSS activity.

15. Process units and facilities, with the exception of those identified in Special Conditions 18 and 19 and Attachment A shall be depressurized, emptied, degassed, and placed in service in accordance with the following requirements. **(6/11)**
  - A. The process equipment shall be depressurized to a control device or a controlled recovery system prior to venting to atmosphere, degassing, or draining liquid. Equipment that only contains material that is liquid with VOC partial pressure less than 0.50 psi at the normal process temperature and 95°F may be opened to atmosphere and drained in accordance with paragraph C of this special condition. The vapor pressure at 95°F may be used if the actual temperature of the liquid is verified to be less than 95°F and the temperature is recorded.
  - B. If mixed phase materials must be removed from process equipment, the cleared material shall be routed to a knockout drum or equivalent to allow for managed initial phase separation. If the VOC partial pressure is greater than 0.50 psi at either the normal process temperature or 95°F, any vents in the system must be routed to a control device or a controlled recovery system. The vapor pressure at 95°F may be used if the actual temperature of the liquid is verified to be less than 95°F and the temperature is recorded. Control must remain in place until degassing has been completed or the system is no longer vented to atmosphere.
  - C. All liquids from process equipment or storage vessels must be removed to the maximum extent practical prior to opening equipment to commence degassing and/or maintenance. Liquids must be drained into a closed vessel or closed liquid recovery system unless prevented by the physical configuration of the equipment. If it is necessary to drain liquid into an open pan or sump, the liquid must be covered or transferred to a covered vessel within one hour of being drained.
  - D. If the VOC partial pressure is greater than 0.50 psi at the normal process temperature or 95°F, facilities shall be degassed using good engineering practice to ensure air contaminants are removed from the system through the control device or controlled recovery system to the extent allowed by process equipment or storage vessel design. The vapor pressure at 95°F may be used if the actual temperature of the liquid is verified to be less than 95°F and the temperature is recorded. The facilities to be degassed shall not be vented directly to atmosphere, except as necessary to establish isolation of the work area or to monitor VOC concentration following controlled depressurization. The venting shall be



minimized to the maximum extent practicable and actions taken recorded. The control device or recovery system utilized shall be recorded with the estimated emissions from controlled and uncontrolled degassing calculated using the methods that were used to determine allowable emissions for the permit application.

- (1) For MSS activities identified in Attachment B, the following option may be used in lieu of 2 below. The facilities being prepared for maintenance shall not be vented directly to atmosphere until the VOC concentration has been verified to be less than 10 percent of the lower explosive limit (LEL) per the site safety procedures.
  - (2) The locations and/or identifiers where the purge gas or steam enters the process equipment or storage vessel and the exit points for the exhaust gases shall be recorded (process flow diagrams [PFDs] or piping and instrumentation diagrams [P&IDs] may be used to demonstrate compliance with the requirement). If the process equipment is purged with a gas, two system volumes of purge gas must have passed through the control device or controlled recovery system before the vent stream may be sampled to verify acceptable VOC concentration prior to uncontrolled venting. The VOC sampling and analysis shall be performed using an instrument meeting the requirements of Special Condition 16. The sampling point shall be upstream of the inlet to the control device or controlled recovery system. The sample ports and the collection system must be designed and operated such that there is no air leakage into the sample probe or the collection system downstream of the process equipment or vessel being purged. If there is not a connection (such as a sample, vent, or drain valve) available from which a representative sample may be obtained, a sample may be taken upon entry into the system after degassing has been completed. The facilities shall be degassed to a control device or controlled recovery system until the VOC concentration is less than 10,000 ppmv or 10 percent of the LEL. Documented site procedures used to de-inventory equipment to a control device for safety purposes (i.e., hot work or vessel entry procedures) that achieve at least the same level of purging may be used in lieu of the above.
- E. Gases and vapors with VOC partial pressure greater than 0.50 psi may be vented directly to atmosphere if all the following criteria are met:
- (1) It is not technically practicable to depressurize or degas, as applicable, into the process.
  - (2) There is not an available connection to a plant control system (flare).
  - (3) There is no more than 50 lb of air contaminant to be vented to atmosphere during shutdown or startup, as applicable.

All instances of venting directly to atmosphere per Special Condition 15E must be documented when occurring as part of any MSS activity. The emissions associated with venting without control must be included in the work order or equivalent for those planned MSS activities identified in Attachment B.

16. Air contaminant concentration shall be measured using an instrument/detector meeting one set of requirements specified below. (6/11)

A. VOC concentration shall be measured using an instrument meeting all the requirements specified in EPA Method 21 (40 CFR 60, Appendix A) with the following exceptions:

(1) The instrument shall be calibrated within 24 hours of use with a calibration gas such that the response factor of the VOC (or mixture of VOCs) to be monitored shall be less than 2.0. The calibration gas and the gas to be measured, and its approximate response factor shall be recorded.

If the RF of the VOC (or mixture of VOCs) to be monitored is greater than 2.0, the VOC concentration shall be determined as follows:

$$\text{VOC Concentration} = \text{Concentration as read from the instrument} * \text{RF}$$

In no case should a calibration gas be used such that the RF of the VOC (or mixture of VOCs) to be monitored is greater than 5.0.

(2) Sampling shall be performed as directed by this permit in lieu of section 8.3 of Method 21. During sampling, data recording shall not begin until after two times the instrument response time. The date and time shall be recorded, and VOC concentration shall be monitored for at least 5 minutes, recording VOC concentration each minute. As an alternative the VOC concentration may be monitored over a five-minute period with an instrument designed to continuously measure concentration and record the highest concentration read. The highest measured VOC concentration shall be recorded and shall not exceed the specified VOC concentration limit prior to uncontrolled venting.

(3) If a TVA-1000 series Flame Ionization Detector (FID) analyzer or equivalent calibrated with methane is used to determine the VOC concentration, a measured concentration of 34,000 ppmv may be considered equivalent to 10,000 ppmv as VOC.

B. Colorimetric gas detector tubes may be used to determine air contaminant concentrations if they are used in accordance with the following requirements.

(1) The air contaminant concentration measured as defined in (3) is less than 80 percent of the range of the tube and is at least 20 percent of the maximum range of the tube.

(2) The tube is used in accordance with the manufacturer's guidelines.

(3) At least 2 samples taken at least 5 minutes apart must satisfy the following prior to uncontrolled venting:

measured contaminant concentration (ppmv) < release concentration.

Where the release concentration is:

10,000 \* mole fraction of the total air contaminants present that can be detected by the tube.

The mole fraction may be estimated based on process knowledge. The release concentration and basis for its determination shall be recorded.

Records shall be maintained of the tube type, range, measured concentrations, and time the samples were taken.

C. Lower explosive limit measured with a lower explosive limit detector.

- (1) The detector shall be calibrated monthly with a certified pentane gas standard at 25% of the lower explosive limit (LEL) for pentane. Records of the calibration date/time and calibration result (pass/fail) shall be maintained.
- (2) A functionality test shall be performed on each detector within 24 hours of use with a certified gas standard at 25% of the LEL for pentane. The LEL monitor shall read no lower than 90% of the calibration gas certified value. Records, including the date/time and test results, shall be maintained.
- (3) A certified methane gas standard equivalent to 25% of the LEL for pentane may be used for calibration and functionality tests provided that the LEL response is within 95% of that for pentane.

17. This condition applies only to piping and components subject to leak detection and repair monitoring requirements identified in other NSR permits. Each open-ended valve or line shall be equipped with an appropriately sized cap, blind flange, plug, or a second valve to seal the line. Except during sampling, both valves shall be closed. If the removal of a component for repair or replacement results in an open ended line or valve, it is exempt from the requirement to install a cap, blind flange, plug, or second valve for 72 hours. If the repair or replacement is not completed within 72 hours, the permit holder must complete either of the following actions within that time period; (6/11)

- A. a cap, blind flange, plug, or second valve must be installed on the line or valve; or
- B. the open-ended valve or line shall be monitored once for leaks above background for a plant or unit turnaround lasting up to 45 days with an approved gas analyzer and the results recorded. For all other situations, the open-ended valve or line shall be monitored once by the end of the 72 hours period following the creation of the open ended line and monthly thereafter with an approved gas analyzer and the results recorded. For turnarounds and all other situations, leaks are indicated by readings of 500 ppmv and must be repaired within 24 hours or a cap, blind flange, plug, or second valve must be installed on the line or valve.

18. Fixed roof storage tanks are subject to the following requirements: (6/11)

- A. The tank shall not be opened or ventilated without control, to minimize air circulation in the tank vapor space, except as allowed by (1) or (2) below, until one of the criteria in part B of this condition is satisfied.
  - (1) One manway may be opened to allow access to the tank to remove or de-volatilize the remaining liquid. Other manways or access points may be opened as necessary to remove or de-volatilize the remaining liquid. Wind

barriers shall be installed at all open manways and access points to minimize air flow through the tank.

- (2) Access points shall be closed when not in use.
- B. The tank may be opened without restriction and ventilated without control, after all standing liquid has been removed from the tank or the liquid remaining in the tank has a VOC partial pressure less than 0.02 psia. These criteria shall be demonstrated in any one of the following ways.
- (1) Low VOC partial pressure liquid that is soluble with the liquid previously stored may be added to the tank to lower the VOC partial pressure of the liquid mixture remaining in the tank to less than 0.02 psia. This liquid shall be added during tank degassing if practicable. The estimated volume of liquid remaining in the drained tank and the volume and type of liquid added shall be recorded. The liquid VOC partial pressure may be estimated based on this information and engineering calculations.
  - (2) If water is added or sprayed into the tank to remove standing VOC, one of the following must be demonstrated:
    - (a) Take a representative sample of the liquid remaining in the tank and verify no visible sheen using the static sheen test from 40 CFR 435 Subpart A Appendix 1.
    - (b) Take a representative sample of the liquid remaining in the tank and verify hexane soluble VOC concentration is less than 1000 ppmw using EPA method 1664 (may also use 8260B or 5030 with 8015 from SW-846).
    - (c) Stop ventilation and close the tank for at least 24 hours. When the tank manway is opened after this period, verify VOC concentration is less than 1000 ppmv through the procedure in Special Condition 16.
  - (3) No standing liquid verified through visual inspection.

The permit holder shall maintain records to document the method used to release the tank.

- C. If the ventilation of the vapor space is controlled, the emission control system shall meet the following requirements:
- (1) Any gas or vapor removed from the tank vapor space must be routed to a control device or a controlled recovery system and controlled degassing must be maintained until the VOC concentration is less than 10,000 ppmv or 10 percent of the LEL. The locations and identifiers of vents other than permanent roof fittings and seals, control device or controlled recovery system, and controlled exhaust stream shall be recorded. There shall be no other gas/vapor flow out of the vapor space when degassing to the control device or controlled recovery system.

- (2) The tank shall be vented using good engineering practice to ensure air contaminants are flushed out of the tank through the control device or controlled recovery system to the extent allowed by the storage tank design.
- (3) A volume of purge gas equivalent to twice the volume of the tank vapor space must have passed through the control device or into a controlled recovery system, before the vent stream may be sampled to verify acceptable VOC concentration. The measurement of purge gas volume shall not include any make-up air introduced into the control device or recovery system. The VOC sampling and analysis shall be performed as specified in Special Condition 16.
- (4) The sampling point shall be upstream of the inlet to the control device or controlled recovery system. The sample ports and the collection system must be designed and operated such that there is no air leakage into the sample probe or the collection system downstream of the process equipment or vessel being purged.
- (5) Degassing must be performed every 24 hours unless there is no standing liquid in the tank or the VOC partial pressure of the remaining liquid in the tank is less than 0.15 psia.

D. Records shall be maintained as follows:

- (1) For the purpose of estimating emissions, the date, time, and other information specified for each of the following events:
  - (a) start and completion of controlled degassing, and total volumetric flow,
  - (b) all standing liquid was removed from the tank or any transfers of low VOC partial pressure liquid to or from the tank including volumes and vapor pressures to reduce tank liquid VOC partial pressure to  $<0.02$  psi, and
  - (c) if there is liquid in the tank, VOC partial pressure of liquid, start and completion of uncontrolled degassing, and total volumetric flow.
- (2) The estimated quantity of each air contaminant, or mixture of air contaminants, emitted in the events listed in D1 of this condition, with the data and methods used to determine it.

E. Each fixed roof tank containing liquid with a VOC partial pressure which is less than 0.02 psia at the maximum stored liquid temperature may be opened without restriction and ventilated without control, and shall be subject to the following:

- (1) Parts A, B, C, and D of this condition do not apply.
- (2) The permit holder shall maintain a record which includes:
  - (a) tank identification number, name of the material stored, and VOC vapor pressure, in psia, at the maximum stored liquid temperature, and
  - (b) estimated quantity of each air contaminant, or mixture of air contaminants, emitted during MSS activities, with the data and methods used to determine it. The emissions shall be calculated using the methods described in Section 7.1.3.2 of AP-42 "Compilation of Air Pollution

Emission Factors, Chapter 7 - Storage of Organic Liquids" dated November 2006 and the permit application.

19. The following requirements apply to frac, or temporary, tanks and vessels used in support of MSS activities. **(6/11)**
  - A. The exterior surfaces of these tanks/vessels that are exposed to the sun shall be white or aluminum effective May 1, 2013. This requirement does not apply to tanks/vessels that only vent to atmosphere when being filled, sampled, gauged, or when materials are removed.
  - B. These tanks/vessels must be covered and equipped with fill pipes that discharge within 6 inches of the tank/vessel bottom.
  - C. These requirements do not apply to vessels storing less than 450 gallons of liquid that are closed such that the vessel does not vent to atmosphere when being filled, sampled, gauged, or when materials are removed.
  - D. The permit holder shall maintain an emissions record which includes calculated emissions of VOC from all frac tanks during the previous calendar month and the past consecutive 12 month period. The record shall include tank identification number, dates put into and removed from service, control method used, tank capacity and volume of liquid stored in gallons, name of the material stored, VOC molecular weight, and VOC partial pressure at the estimated monthly average material temperature in psia. Filling emissions for tanks shall be calculated using the TCEQ publication titled "Technical Guidance Package for Chemical Sources - Loading Operations" and standing emissions determined using: the TCEQ publication titled "Technical Guidance Package for Chemical Sources - Storage Tanks."
  - E. If the tank/vessel is used to store liquid with VOC partial pressure less than 0.10 psi at 95°F, records may be limited to the days the tank is in service and the liquid stored. Emissions may be estimated based upon the potential to emit as identified in the permit application.
20. Additional occurrences of MSS activities authorized by this permit may be authorized under permit by rule only if conducted in compliance with this permit's procedures, emission controls, monitoring, and recordkeeping requirements applicable to the activity. **(6/11)**
21. All permanent facilities must comply with all operating requirements, limits, and representations in the permits identified in Attachment C during planned startup and shutdown unless alternate requirements and limits are identified in this permit. Alternate requirements for emissions from routine emission points are identified below. **(6/11)**
  - A. Combustion units, with the exception of flares, at this site are exempt from NO<sub>x</sub> and CO operating requirements identified in special conditions in other NSR permits during planned startup and shutdown if the following criteria are satisfied.

- (1) The maximum allowable emission rates in the permit authorizing the facility are not exceeded.
  - (2) The startup period does not exceed 8 hours in duration and the firing rate does not exceed 75 percent of the design firing rate. The time it takes to complete the shutdown does not exceed 4 hours.
  - (3) Control devices are started and operating properly when venting a waste gas stream.
- B. A record shall be maintained indicating that the start and end times of each of the activities identified above occur and documentation that the requirements for each have been satisfied.
22. With the exception of the MAERT emission limits, the MSS permit conditions become effective 180 days after this permit has been issued. During this period, monitoring and recordkeeping shall satisfy the requirements of Special Condition 14.A through 14.D. Emissions shall be estimated using good engineering practice and methods to provide reasonably accurate representations for emissions. The basis used for determining the quantity of air contaminants to be emitted shall be recorded. The permit holder may maintain abbreviated records of emissions from Attachment A and B activities as allowed in Special Condition 14 rather than documenting all the information required by Special Condition 14 parts A through D. **(6/11)**
23. Planned maintenance activities must be conducted in a manner consistent with good practice for minimizing emissions, including the use of air pollution control equipment, practices and processes. All reasonable and practical efforts to comply with Special Conditions 14 through 23 must be used when conducting the planned maintenance activity, until the commission determines that the efforts are unreasonable or impractical, or that the activity is an unplanned maintenance activity. **(6/11)**

#### **2013 NO<sub>x</sub> Reduction Project**

24. As required by the US EPA Consent Decree, effective July 28, 2009, and incorporated in the Texas Compliance Agreement, effective April 13, 2010 ("Consent Decree"), INVISTA shall install and commence Continuous Operation of SNCR technology, on one of Boilers 1, 2, 3, or 4 by no later than December 31, 2013, and on one of the remaining boilers 1-4 by no later than December 31, 2015 and on the remaining boilers 1-4 by no later than December 31, 2016. Further, INVISTA shall comply with the following: **(4/13)**
- A. Immediately after the installation of SNCR on each boiler, INVISTA shall begin a 180-day period of optimizing the performance of the SNCR for that boiler (the "SNCR Optimization Period").
  - B. Following the SNCR Optimization Period, INVISTA shall submit an emission report (the "Initial SNCR Emissions Report") to EPA as required by Paragraph 21 of the Consent Decree, including proposed operating parameter limits and proposed NO<sub>x</sub> emission limits for each boiler ("Proposed Limits"). Immediately

following submission of the Initial SNCR Emissions Report to EPA, INVISTA shall comply with the Proposed Limits.

- C. No later than 30 days after submittal of the Initial SNCR Emission Report referenced in B above to EPA, the permit holder shall submit a request to TCEQ to alter or amend this permit, as appropriate, to incorporate the Proposed Limits contained in the initial SNCR Emission Report.
- D. EPA will set the final NO<sub>x</sub> emission limits and operating parameters ("Final Limits") for each boiler based on INVISTA's Initial SNCR Emissions Report. INVISTA shall comply with the Proposed Limits immediately following submission of the Initial SNCR Emissions Report. INVISTA shall comply with the Final Limits (1) no later than thirty (30) days following INVISTA's receipt of notice from EPA regarding the Final Limits or (2) upon the issuance of an alteration or amendment to this permit incorporating the final limits, if necessary, from the TCEQ, whichever is earlier.
25. In addition to the requirements in Special Condition 24, INVISTA shall install and begin operating a continuous ammonia monitor on each stack (EPNs 15STK-005 and EPNs 15STK-006 or in the duct exiting each boiler) within 30 days of commencing operation of the SNCR on one of the boilers sharing the stack or in the duct exiting that boiler. The monitor shall be operated according to manufacturer's direction including appropriate calibrations and inspections which shall occur at least annually. The permit holder shall identify the monitor and describe its operation and maintenance in the update required by Special Condition 24.
- The ammonia concentration as measured by the continuous ammonia monitor shall not exceed 10 parts per million by volume dry (ppmvd) at 3% oxygen on a 24 hour rolling average excluding the first hour of Selective Non-catalytic Reduction (SNCR) startups. **(4/13)**
26. Maintenance of the SNCR system that requires shutdown of SNCR is authorized while the boiler(s) is operating provided allowable emissions limits on the MAERT are not exceeded. Maintenance on the SNCR may also be performed while the boiler is not operating. Records shall be kept of the date, time, and duration of each event. Additional conditions regarding maintenance, start-up, and shutdown such as duration may be added after submission of the update required by Special Condition 24.C. **(4/13)**



27. The modifications addressed in the amendment application originally submitted April 30, 2012 were determined not to be subject to major new source review by identifying projected actual emission rates for the facilities potentially affected by the project. Actual emissions from those facilities shall be monitored or calculated, recorded and reports made in accordance 30 TAC § 116.127 for the time period specified in 30 TAC § 116.127(b)(1). (4/13)

Dated April 26, 2013

Permit 812  
Attachment A  
Inherently low Emitting Activities

Activity	VOC Emissions
Soap and other aqueous based cleaners	X
Cleaning sight glasses	X
Management of sludge from pits, ponds, sumps, and water conveyances	X
Aerosol Cans	X
Calibration of analytical equipment	X
Replacement of analyzer filters and screens	X
Maintenance on water treatment systems (cooling, boiler, potable)	X
Instrumentation/analyzer maintenance/calibration	X
Meter proving	X

Dated June 6, 2011

Permit 812  
Attachment B  
Routine MSS Activities

EPN	EPN Description	Activity
15 FUG-MSS	MSS Fugitive Emissions	15TFX-022 Tank Opening for Maintenance, Vacuum Breaker and Conservation Vent
15FUG-MSS	Fugitive MSS Emissions	LPSOG & HPSOG Double Block & Bleed at Boiler
15FUG-MSS	Fugitive MSS Emissions	Boiler 3 DCC Vent from Double Block & Bleed at Boiler Burners
15FUG-MSS	Fugitive MSS Emissions	Boiler 4 DCC Vent from Double Block & Bleed at Boiler Burners
15FUG-MSS	Fugitive MSS Emissions	Clearing Pumps, Lines, and Valves
15FUG-MSS	Fugitive MSS Emissions	NVR Filter Maintenance and Change-outs
15FUG-MSS	Fugitive MSS Emissions	15TFX-021 Tank Openings, Vacuum Breaker and Conservation Vent

Dated June 6, 2011

Permit 812  
Attachment C  
MSS Activity Summary

<b>EPN</b>	<b>EPN Description</b>	<b>Activity</b>
15STK-005	Stack for Boilers 1 & 2	Boilers 1 & 2 Start-Up and Sootblowing
15STK-006	Stack for Boilers 3 & 4	Boilers 3 & 4 Start-Up and Sootblowing
15FUG-MSS	Inherently Low Emitting Activities	See Attachment A
15FUG-MSS	Routine MSS Activities	See Attachment B

Dated June 6, 2011

Emission Sources - Maximum Allowable Emission Rates

Permit Number 812

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	
			lbs/hour	TPY (4)
15STK-005 and 15STK-006  Combined Limit (5)(8)	Boiler No. 1 Boiler No. 2 Boiler No. 3 Boiler No. 4	NO <sub>x</sub>	4,658.0	3,809.0
		CO	260	111.23
		CO (MSS)(7)	210.00	1.84
		SO <sub>2</sub>	20.86	37.06
		PM	104.3	196.9
		PM (MSS)(6)	146.63	0.53
		PM (MSS)(7)	146.82	0.57
		PM <sub>10</sub>	104.3	196.9
		PM <sub>10</sub> (MSS)(6)	146.63	0.53
		PM <sub>10</sub> (MSS)(7)	146.82	0.57
		PM <sub>2.5</sub>	104.3	196.9
		PM <sub>2.5</sub> (MSS)(6)	146.63	0.53
		PM <sub>2.5</sub> (MSS)(7)	146.82	0.57
		VOC	3.37	8.15
		N <sub>2</sub> O	743.85	287.24
HCl	105.8	226.0		
NH <sub>3</sub> (11)	10.75	45.50		

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
15STK-005 and 15STK-006	Boiler No. 1 Boiler No. 2 Boiler No. 3 Boiler No. 4	NO <sub>x</sub>	2,831.30	1,853.34
		CO	260.02	111.23
Combined Limit (5)(9)		CO (MSS)(7)	210.00	1.84
		SO <sub>2</sub>	20.86	37.06
		PM	90.94	110.86
		PM (MSS)(6)	146.63	0.53
		PM (MSS)(7)	146.82	0.57
		PM <sub>10</sub>	90.94	110.86
		PM <sub>10</sub> (MSS)(6)	146.63	0.53
		PM <sub>10</sub> (MSS)(7)	146.82	0.57
		PM <sub>2.5</sub>	90.94	110.86
		PM <sub>2.5</sub> (MSS)(6)	146.63	0.53
		PM <sub>2.5</sub> (MSS)(7)	146.82	0.57
		VOC	3.37	8.15
		N <sub>2</sub> O	743.85	287.24
		HCl	98.98	110.50
		NH <sub>3</sub> (11)	10.75	45.50

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	lbpy (4)
15CAT-001	Catalytic Abater	NO <sub>x</sub>	394.00	501.00
		CO	89.60	42.80
		PM	0.40	1.00
		PM <sub>10</sub>	0.40	1.00
		PM <sub>2.5</sub>	0.40	1.00
		VOC	31.30	36.10
		N <sub>2</sub> O	4,998.11	7,887.29
15STK-005	Non-volatile Residue Tank	NH <sub>3</sub>	9.90	9.90
		VOC	2.37	0.10
15FUG	Fugitives (10)	NO <sub>x</sub>	0.13	0.59
		CO	1.08	4.72
		VOC	1.83	5.16
		N <sub>2</sub> O	2.37	10.37
		NH <sub>3</sub>	0.01	0.02
15TFX-022	HCl Tank	HCl	0.17	0.10
15LTR-023	HCl Trailer Unload	HCl	0.30	0.10
15CAD-001	Distillate Dumpster	VOC	0.01	0.10
15TFX-024	Lube Oil Dumpster	VOC	0.05	0.10
15TFX-025	Lube Oil Dumpster	VOC	0.02	0.10
15FUG-MSS	West Powerhouse Area Miscellaneous Fugitive MSS (10)	CO	0.56	0.01
		VOC	0.14	0.01
		HCl	2.36	0.01

Emission Sources - Maximum Allowable Emission Rates

- (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) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1  
NO<sub>x</sub> - total oxides of nitrogen  
SO<sub>2</sub> - sulfur dioxide  
PM - total particulate matter, suspended in the atmosphere, including PM<sub>10</sub> and PM<sub>2.5</sub>, as represented  
PM<sub>10</sub> - total particulate matter equal to or less than 10 microns in diameter, including PM<sub>2.5</sub>, as represented  
PM<sub>2.5</sub> - particulate matter equal to or less than 2.5 microns in diameter  
CO - carbon monoxide  
HCl - hydrogen chloride  
N<sub>2</sub>O - nitrous oxide  
NH<sub>3</sub> - ammonia
- (4) Compliance with annual emission rates is based on a 12-month rolling period. Annual emission rates for each source include planned SS emissions.
- (5) Planned maintenance, startup, and shutdown (MSS) lbs/hour emissions for all pollutants are authorized even if not specifically identified as MSS. During any clock hour that includes one or more minutes of planned MSS, that pollutant's maximum hourly emission rate shall apply during that clock hour.
- (6) This MSS rate is applicable to Boilers Nos. 1 and 2, (EPN 15STK-005).
- (7) This MSS rate is applicable to Boilers Nos. 3 and 4, (EPN 15STK-006).
- (8) These emission rates are effective prior to continuous operation of the SNCRs on all four boilers, but not later than January 1, 2017. Start of continuous operation of SNCR is defined as the 30<sup>th</sup> day of SNCR operation following initial start-up of the SNCR system.
- (9) These emission rates are effective after continuous operation of the SNCRs on all four boilers begins, but no later than January 1, 2017.
- (10) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.
- (11) The NH<sub>3</sub> lb/hr maximum allowable emission rates are based on a 24-hour rolling average.

Date: April 26, 2013



## Permit Amendment Source Analysis & Technical Review

Company	INVISTA S.a r.l.	Permit Number	812
City	Victoria	Project Number	177295
County	Victoria	Account Number	VC-0008-Q
Project Type	Amend	Regulated Entity Number	RN102663671
Project Reviewer	Mr. Sean O'Brien	Customer Reference Number	CN602582231
Site Name	Victoria West Powerhouse		

### Project Overview

Invista proposes the following:

1. add Selective Non-Catalytic Reduction (SNCR) and low NOx burners to all four of the West Powerhouse boilers (this will be a phased project occurring through 2017);
2. modify the boilers, including retubing, rebuilding, and other improvements and modernization; and
3. revise some waste fuel flow rates and associated allowable emission rates, to ensure adequate operational flexibility. Also, physical changes to the fuel piping system will occur.

Item 1 was due to a Consent Decree with EPA and Compliance Agreement with TCEQ.

### Emission Summary

Air Contaminant	Current Allowable Emission Rates (tpy)	Proposed Allowable Emission Rates (tpy)	Change in Allowable Emission Rates (tpy)
PM	199.0	112.96	-86.04
PM <sub>10</sub>	199.0	112.96	-86.04
PM <sub>2.5</sub>	199.0	112.96	-86.04
VOC	48.91	49.82	0.91
NO <sub>x</sub>	3809.46	2354.93	-1454.53
CO	82.93	160.6	77.67
SO <sub>2</sub>	34.3	37.06	2.76
HCl	226.21	110.71	-115.50
N <sub>2</sub> O	8054	8184.9	130.9
NH <sub>3</sub>	10.4	55.42	45.02

### Compliance History Evaluation - 30 TAC Chapter 60 Rules

A compliance history report was reviewed on:	2/8/2013
Compliance period:	9/1/2007-8/31/2012
Site rating & classification:	8.48, Satisfactory
Company rating & classification:	8.85, Satisfactory
If the rating is 50<RATING<55, what was the outcome, if any, based on the findings in the formal report:	n/a
Has the permit changed on the basis of the compliance history or rating?	No

### Public Notice Information - 30 TAC Chapter 39 Rules

Rule Citation	Requirement
39.403	Is Public Notice Required? <span style="float: right;">Yes</span>
	Date Application Received: <span style="float: right;">April 30, 2012</span>
	Date Administratively Complete: <span style="float: right;">May 14, 2012</span>

## Permit Amendment Source Analysis & Technical Review

Permit No. 812  
Page 2

Regulated Entity No. RN102663671

Rule Citation	Requirement	
	Small Business Source?	No
	Date Leg Letters mailed:	May 14, 2012
39.603	Date Published:	5/25/2012
	Publication Name:	<i>The Victoria Advocate</i>
	Pollutants:	<b>carbon monoxide, nitrogen oxides, sulfur dioxide, nitrous oxide, hydrogen chloride, ammonia, particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less (including lead), and organic compounds</b>
	Date Affidavits/Copies Received:	6/1/2012
	Is bilingual notice required?	No, no program required
39.604	Public Comments Received?	No
	Hearing Requested?	No
	Meeting Request?	No
	Date Response to Comments sent to OCC:	n/a
	Consideration of Comments:	n/a
	Is 2nd Public Notice required?	Yes
39.419	Date 2nd Public Notice/Preliminary Decision Letter Mailed:	2/20/2013
39.413	Date Cnty Judge, Mayor, and COG letters mailed:	n/a
	Date Federal Land Manager letter mailed:	n/a
39.605	Date affected states letter mailed:	n/a
39.603	Date Published:	3/10/2013
	Publication Name:	<i>The Victoria Advocate</i>
	Pollutants:	<b>carbon monoxide, nitrogen oxides, sulfur dioxide, nitrous oxide, hydrogen chloride, ammonia, particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less (including lead), and organic compounds</b>
	Date Affidavits/Copies Received:	3/18/2013
	Is bilingual notice required?	No, no program required
	Date Certification of Sign Posting / Application Availability Received:	4/24/2013
	Public Comments Received?	No
	Meeting Request?	No
	Date Meeting Held:	n/a
	Hearing Request?	No
	Date Hearing Held:	n/a
	Request(s) withdrawn?	n/a
	Date Withdrawn:	n/a

## Permit Amendment Source Analysis & Technical Review

Permit No. 812  
Page 3

Regulated Entity No. RN102663671

Rule Citation	Requirement	
	Consideration of Comments:	n/a
39.421	Date RTC, Technical Review & Draft Permit Conditions sent to OCC:	n/a
	Request for Reconsideration Received?	n/a
	Final Action:	n/a
	Are letters Enclosed?	n/a

### Construction Permit & Amendment Requirements - 30 TAC Chapter 116 Rules

Rule Citation	Requirement	
116.111(a)(2)(G)	Is the facility expected to perform as represented in the application?	Yes
116.111(a)(2)(A)(i)	Are emissions from this facility expected to comply with all TCEQ air quality Rules & Regulations, and the intent of the Texas Clean Air Act?	Yes
116.111(a)(2)(B)	Emissions will be measured using the following method: <b>CEMS for NOx and CO, calculations based on measured process variables for other pollutants</b>	
	Comments on emission verification:	
116.111(a)(2)(D)	Subject to NSPS? Subparts <b>A &amp; D (Boiler 4 only)</b>	Yes
116.111(a)(2)(E)	Subject to NESHAP? Subparts <b>A &amp; FF</b>	Yes
116.111(a)(2)(F)	Subject to NESHAP (MACT) for source categories? Subparts <b>A &amp; H, EEE, FFFF</b>	Yes
116.111(a)(2)(H)	<b>Nonattainment review applicability:</b> Site is located in an attainment county.	

## Permit Amendment Source Analysis & Technical Review

Permit No. 812  
Page 4

Regulated Entity No. RN102663671

Rule Citation	Requirement
116.111(a)(2)(I)	<p><b>PSD review applicability:</b> The applicant chose to exclude certain emissions per 30 TAC 116.12(30)(A), the definition of project emissions increase, as described here. These emissions were based on liquid and gaseous waste feed rates. Invista showed that the highest monthly feed rate used to show what the boiler could accommodate was not abnormal, as indicated by the fact that there were many months in the past ten years during which the feed rate was near the highest rate.</p>

Given the complex nature of how the waste is generated by the chemical plant and the physical nature of the waste, viewing the fuel flow data on a monthly basis provides an adequate look at how the boiler could function over a full 12 months. If the boiler could not handle burning the waste or the chemical process could not produce the waste consistently, the monthly data would not reflect so many months of high generation and destruction. This demonstrates that the boiler could accommodate without modification much higher amounts of waste fuel than was actually burned on average during the highest consecutive 12-month period in the 24-month baseline period. So, an annualized maximum emission rate (based on waste feed rates) was calculated by dividing the highest monthly rate by the days in that month and then multiplying by 365 days/yr. The difference between this ability to handle (or emit) and the actual annual average feed rate (or emission rate) used to calculate a NOx emission rate of 477 tpy to be excluded from the project emissions increase as a 'capable of accommodating' amount.

The projected actual emissions for this project are 1,854 tpy. So, the project emissions increase is calculated as follows: Project Emissions Increase = projected actual emissions - baseline actual emissions - excluded emissions (capable of accommodating) or 1,854 tpy - 1339 tpy - 477 tpy = 38 tpy (less than significant level of 40 TPY for NOx). A similar analysis was performed for other criteria pollutants and resulted in a project increase less than significant. A condition has been placed in the permit referencing the records required to be generated by 30 TAC § 116.121 since projected actual and/or excluded emissions were relied upon. The boilers are monitored by a NOx CEMS which will provide accurate emissions data for these records.

For the above reasons, PSD is not applicable. This is summarized in the table below.

Pollutant	Projected Actual Emission Rate (PAE) (TPY)	Baseline Actual Emission Rate (BAE) (TPY)	Capable of Accommodating (COA) Exclusion (TPY)	Project Increase (PAE-BAE-COA) (TPY)	PSD Significance Level (TPY)
CO	117.80	19.11	5.98	92.71	100
NO <sub>x</sub>	1853.93	1339.38	477.28	37.27	40
SO <sub>2</sub>	37.06	9.56	6.81	20.68	40
PM	111.96	81.19	21.33	9.43	25
PM <sub>10</sub>	111.96	81.19	21.33	9.43	15
PM <sub>2.5</sub>	111.96	81.19	21.33	9.43	10
VOC	13.32	5.32	1.31	6.69	40
Pb	0.075	0.033	0.05	0.027	0.6

116.111(a)(2)(L)	Is Mass Emissions Cap and Trade applicable to the new or modified facilities?	No
	If yes, did the proposed facility, group of facilities, or account obtain allowances to operate:	n/a
116.140 - 141	Permit Fee: \$ 75,000	Fee certification: R226570

## Permit Amendment Source Analysis & Technical Review

Permit No. 812  
Page 5

Regulated Entity No. RN102663671

### Title V Applicability - 30 TAC Chapter 122 Rules

Rule Citation	Requirement	
122.10(13)(A)	Is the site a major source under FCAA Section 112(b)?	<b>Yes</b>
	Does the site emit 10 tons or more of any single HAP?	<b>Yes</b>
	Does the site emit 25 tons or more of a combination?	<b>Yes</b>
122.10(13)(C)	Does the site emit 100 tons or more of any air pollutant?	<b>Yes</b>
122.10(13)(D)	Is the site a non-attainment major source?	<b>No</b>
122.602	<b>Periodic Monitoring (PM) applicability:</b> Periodic monitoring consists of COMS for opacity, a CO CEMS, NH <sub>3</sub> continuous monitor, and flow rate meters for various fuels.	
122.604	<b>Compliance Assurance Monitoring (CAM) applicability:</b> After the SNCR installation, CAM will be applicable to the boilers. The boilers have a NO <sub>x</sub> CEMS.	

### Request for Comments

Received From	Program/Area Name	Reviewed By	Comments
Region:	14	Dianne McCoig	No objections

### Process/Project Description

INVISTA's Victoria Plant has two independent powerhouses which use liquid and gaseous process wastes and supplemental natural gas as boiler fuel. Four boilers (Numbers 1, 2, 3, and 4) are located in the West (Adipic) Power Area and two boilers (Numbers 7 and 8) are located in the East (Diamine) Power Area. All six boilers are tangentially fired, Combustion Engineering Model VU-60 boilers, and produce steam at a nominal pressure of 550 psig. Boilers 1, 2, 3, and 4 in the West Power Area currently operate under TCEQ Permit Number 812, and Boilers 7 and 8 in the East Power Area operate under TCEQ Permit Number 813.

This is an application to amend the West Powerhouse (WPH) permit to authorize the following changes to Boilers 1, 2, 3, and 4: 1) The addition of Selective Non-Catalytic Reduction (SNCR) and low-NO<sub>x</sub> burner control technology in each boiler; 2) Modifications to each boiler, including retubing, rebuilding, and other improvements and modernization; and 3) revisions to some waste fuel flow rates, and hence to the allowable emission rates, to ensure adequate operational flexibility. Installation of SNCR on Boilers 1, 2, 3, and 4 is required by a Consent Decree among INVISTA, the U.S. Environmental Protection Agency (U.S. EPA), the U.S. Department of Justice, and various state plaintiffs (not including Texas), entered on July 28, 2009 (the "Consent Decree"). Installation of SNCR is also required by a Compliance Agreement between INVISTA and the Texas Commission on Environmental Quality (TCEQ) entered on March 31, 2010 (the "Texas Compliance Agreement").

### Pollution Prevention, Sources, Controls and BACT- [30 TAC 116.111(a)(2)(C)]

The fuel mix in the boilers makes SNCR and SCR questionable as a potential control technology and hence was not considered technically practicable in the past. This demonstration project may change that; however, the BACT review considered only low-NO<sub>x</sub> burners as BACT. Therefore, the post-project allowables on the MAERT are based solely on low-NO<sub>x</sub> burners and keeping the project increase below PSD significance levels. If SNCR works and is economically reasonable, it will become BACT and the MAERT will be reduced further based on the optimization study. Given this, at the moment BACT for NO<sub>x</sub> is low-NO<sub>x</sub> burners until the SNCR demonstration project has been completed. Since these boilers will continue to fire the liquid fuels with catalyst poisons such as phosphorous, SCR is technically infeasible as shown by Invista in a pilot plant project completed a couple years ago. In any case, the post-project allowable are unaffected by the SNCR demonstration project and will be enforceable regardless of its success.

BACT for CO and VOC is good combustion practices. BACT for SO<sub>2</sub> and PM is no controls due to the relatively low concentrations of these pollutants in the exhaust gas stream which makes controls like baghouses ineffective.

## Permit Amendment Source Analysis & Technical Review

Permit No. 812  
Page 6

Regulated Entity No. RN102663671

PBR 93789 is being incorporated and voided. It authorized additional fugitive leak components. All fugitive leak components (other than those in natural gas service) in the permit are subject to 28VHP which is BACT.

### Impacts Evaluation - 30 TAC 116.111(a)(2)(J)

Was modeling conducted? <b>yes</b>	Type of Modeling: <b>SCREEN3</b>	
Will GLC of any air contaminant cause violation of NAAQS?		<b>No</b>
Is this a sensitive location with respect to nuisance?		<b>No</b>
[§116.111(a)(2)(A)(ii)] Is the site within 3000 feet of any school?		<b>No</b>
Additional site/land use information: rural/farmland		

### Summary of Modeling Results

Only pollutants that were increasing above current allowable were modeled. This was CO (1-hr and 8-hr) and SO<sub>2</sub> (annual) for criteria pollutants and N<sub>2</sub>O and NH<sub>3</sub> for non-criteria pollutants.

The impact of CO was less than 50 ug/m<sup>3</sup> which is well below the SIL of 2000 and 500 ug/m<sup>3</sup> for 1-hr and 8-hr NAAQS, respectively. The impact of SO<sub>2</sub> (annual), which will be revoked once EPA makes 1-hr SO<sub>2</sub> Nonattainment Designations, was 6.8 ug/m<sup>3</sup> which is above the SIL (1.0 ug/m<sup>3</sup>). The company previously modeled the only other significant source of SO<sub>2</sub> at the site (the East Powerhouse Boilers) and had a GLCmax of 0.8 ug/m<sup>3</sup>. The sum SO<sub>2</sub> annual impact including a background concentration of all the boilers is well below the NAAQS of 80 ug/m<sup>3</sup>.

The impacts of NH<sub>3</sub> and N<sub>2</sub>O were well below the ESL (~10% of the ESL) and the modeling represents the majority of these emissions at the site.

### Permit Concurrence and Related Authorization Actions

Is the applicant in agreement with special conditions?	<b>Yes</b>
Company representative(s):	<b>Pete Buckman</b>
Contacted Via:	<b>Email</b>
Date of contact:	<b>2/8/2013</b>
Other permit(s) or permits by rule affected by this action:	<b>Yes</b>
List permit and/or PBR number(s) and actions required or taken:	<b>Void PBR 93789</b>

Project Reviewer	Date	Team Leader/Section Manager/Backup	Date
------------------	------	------------------------------------	------