

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



## EXAMPLE A

### NOTICE OF APPLICATION AND PRELIMINARY DECISION FOR AIR QUALITY PERMITS

#### PROPOSED AIR QUALITY PERMIT NUMBERS 174275, PSDTX1628, AND GHGPSDTX234

**APPLICATION AND PRELIMINARY DECISION.** Ingleside Clean Ammonia Partners, LLC, 915 North Eldridge Parkway Suite 1100, Houston, Texas 77079-2703, has applied to the Texas Commission on Environmental Quality (TCEQ) for issuance of proposed State Air Quality Permit 174275, issuance of Prevention of Significant Deterioration (PSD) Air Quality Permit PSDTX1628, and issuance of Greenhouse Gas (GHG) PSD Air Quality Permit GHGPSDTX234 for emissions of GHGs, which would authorize construction of the Blue Ammonia Production Trains 1 and 2 located at 1450 Lexington Boulevard, Ingleside, San Patricio County, Texas 78362. This application was processed in an expedited manner, as allowed by the commission's rules in 30 Texas Administrative Code, Chapter 101, Subchapter J. **AVISO DE IDIOMA ALTERNATIVO.** El aviso de idioma alternativo en español está disponible en <https://www.tceq.texas.gov/permitting/air/newsourcereview/airpermits-pendingpermit-apps>.

The proposed facility will emit the following air contaminants in a significant amount: carbon monoxide, nitrogen oxides, and particulate matter including particulate matter with diameters of 2.5 microns or less. In addition, the facility will emit the following air contaminants: hazardous air pollutants, organic compounds, sulfur dioxide, particulate matter including particulate matter with diameters of 10 microns or less, ammonia, and hydrogen sulfide.

The degree of PSD increment predicted to be consumed by the proposed facility and other increment-consuming sources in the area is as follows:

#### Nitrogen Dioxide

Maximum Averaging Time	Maximum Increment Consumed ( $\mu\text{g}/\text{m}^3$ )	Allowable Increment ( $\mu\text{g}/\text{m}^3$ )
Annual	11	25

#### PM<sub>2.5</sub>

Maximum Averaging Time	Maximum Increment Consumed ( $\mu\text{g}/\text{m}^3$ )	Allowable Increment ( $\mu\text{g}/\text{m}^3$ )
24-hour	8.47	9
Annual	0.41	4

This application was submitted to the TCEQ on October 12, 2023. The executive director has determined that the emissions of air contaminants from the proposed facility which are subject to PSD review will not violate any state or federal air quality regulations and will not have any significant adverse impact on soils, vegetation, or visibility. All air contaminants have been evaluated, and "best available control technology" will be used for the control of these contaminants.

The executive director has completed the technical review of the application and prepared a draft permit which, if approved, would establish the conditions under which the facility must operate. The permit application, executive director's preliminary decision, draft permit, and the executive director's preliminary determination summary and executive director's air quality analysis, will be available for viewing and copying at the TCEQ central office, the TCEQ Corpus Christi regional office, and at the Sinton Public Library, 1000 North Pirate Boulevard, Sinton, San Patricio County, Texas,

beginning the first day of publication of this notice. The facility's compliance file, if any exists, is available for public review at the TCEQ Corpus Christi Regional Office, 500 North Shoreline Boulevard, Suite 500, Corpus Christi, Texas.

**INFORMATION AVAILABLE ONLINE.** These documents are accessible through the Commission's Web site at [www.tceq.texas.gov/goto/cid](http://www.tceq.texas.gov/goto/cid): the executive director's preliminary decision which includes the draft permit, the executive director's preliminary determination summary, air quality analysis, and, once available, the executive director's response to comments and the final decision on this application. Access the Commissioners' Integrated Database (CID) using the above link and enter the permit number for this application. The public location mentioned above provides public access to the internet. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. <https://gisweb.tceq.texas.gov/LocationMapper/?marker=-97.205227,27.824941&level=13>.

**PUBLIC COMMENT/PUBLIC MEETING.** You may submit public comments or request a public meeting to the Office of the Chief Clerk at the address below. The purpose of a public meeting is to provide the opportunity to submit comment or to ask questions about the application. The TCEQ will hold a public meeting if the executive director determines that there is a significant degree of public interest in the application, if requested by an interested person, or if requested by a local legislator. A public meeting is not a contested case hearing. You may submit additional written public comments within 30 days of the date of newspaper publication of this notice in the manner set forth in the AGENCY CONTACTS AND INFORMATION paragraph below.

After the deadline for public comment, the executive director will consider the comments and prepare a response to all relevant and material or significant public comment. The response to comments, along with the executive director's decision on the application, will be mailed to everyone who submitted public comments or is on a mailing list for this application. The mailing will also provide instructions for requesting a contested case hearing or reconsideration of the executive director's decision.

**OPPORTUNITY FOR A CONTESTED CASE HEARING.** You may request a contested case hearing regarding the portions of the application for State Air Quality Permit Number 174275 and for PSD Air Quality Permit Number PSDTX1628. There is no opportunity to request a contested case hearing regarding the portion of the application for GHG PSD Air Quality Permit Number GHGPSDTX234. A contested case hearing is a legal proceeding similar to a civil trial in a state district court. A person who may be affected by emissions of air contaminants, other than GHGs, from the facility is entitled to request a hearing. A contested case hearing request must include the following: (1) your name (or for a group or association, an official representative), mailing address, daytime phone number; (2) applicant's name and permit number; (3) the statement "I/we request a contested case hearing;" (4) a specific description of how you would be adversely affected by the application and air emissions from the facility in a way not common to the general public; (5) the location and distance of your property relative to the facility; (6) a description of how you use the property which may be impacted by the facility; and (7) a list of all disputed issues of fact that you submit during the comment period. If the request is made by a group or association, one or more members who have standing to request a hearing must be identified by name and physical address. The interests the group or association seeks to protect must also be identified. You may also submit your proposed adjustments to the application/permit which would satisfy your concerns. Requests for a contested case hearing must be submitted in writing within 30 days following this notice to the Office of the Chief Clerk, at the address provided in the information section below.

A contested case hearing will only be granted based on disputed issues of fact or mixed questions of fact and law that are relevant and material to the Commission's decisions on the application. The Commission may only grant a request for a contested case hearing on issues the requestor submitted in their timely comments that were not subsequently withdrawn. Issues that are not submitted in public comments may not be considered during a hearing.

**EXECUTIVE DIRECTOR ACTION.** The executive director may issue final approval of the application for the portion of the application for GHG PSD Air Quality Permit GHGPSDTX234. If a timely contested case hearing request is not received or if all timely contested case hearing requests are withdrawn regarding State Air Quality Permit Number 174275 and for PSD Air Quality Permit Number PSDTX1628, the executive director may issue final approval of the application. The response to comments, along with the executive director's decision on the application will be mailed to everyone who submitted public comments or is on a mailing list for this application, and will be posted electronically to the CID. If any timely hearing requests are received and not withdrawn, the executive director will not issue final approval of the State Air Quality Permit Number 174275 and for PSD Air Quality Permit Number PSDTX1628 and will forward the application and requests to the Commissioners for their consideration at a scheduled commission meeting.

**MAILING LIST.** You may ask to be placed on a mailing list to obtain additional information on this application by sending a request to the Office of the Chief Clerk at the address below.

**AGENCY CONTACTS AND INFORMATION.** Public comments and requests must be submitted either electronically at [www14.tceq.texas.gov/epic/eComment/](http://www14.tceq.texas.gov/epic/eComment/), or in writing to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087. Please be aware that any contact information you provide, including your name, phone number, email address and physical address will become part of the agency's public record. For more information about this permit application or the permitting process, please call the Public Education Program toll free at 1-800-687-4040. Si desea información en Español, puede llamar al 1-800-687-4040.

Further information may also be obtained from Ingleside Clean Ammonia Partners LLC at the address stated above or by calling Mr. Clayton Curtis, Director Regulatory Affairs USGC Terminals, Enbridge, Inc., at (855) 385-6645.

Notice Issuance Date: August 26, 2024

## Special Conditions

Permit Numbers 174275, PSDTX1628, and GHGPSDTX234

1. This permit covers only those sources of emissions listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates" (MAERT), and those sources are limited to the emission limits and other conditions specified in that table.
2. Non-fugitive emissions from relief valves, safety valves, or rupture discs of gases containing volatile organic compounds (VOC) at a concentration of greater than 1 percent are not authorized by this permit unless authorized on the MAERT. Any releases directly to atmosphere from relief valves, safety valves, or rupture discs of gases containing VOC at a concentration greater than 1 weight percent are not consistent with good practice for minimizing emissions.

### Federal Applicability

3. These facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations on Standards of Performance for New Stationary Sources promulgated in Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60):
  - A. Subpart A, General Provisions.
  - B. Subpart Db, Industrial-Commercial-Institutional Steam Generating Units.
  - C. Subpart IIII, Stationary Compression Ignition Internal Combustion Engines.
4. These facilities shall comply with all applicable requirements of EPA regulations on National Emission Standards for Hazardous Air Pollutants in 40 CFR Part 61:
  - A. Subpart A, General Provisions.
  - B. Subpart FF, Benzene Waste Operations.
5. These facilities shall comply with all applicable requirements of EPA regulations on National Emission Standards for Hazardous Air Pollutants for Source Categories in 40 CFR Part 63:
  - A. Subpart A, General Provisions.
  - B. Subpart ZZZZ, Stationary Reciprocating Internal Combustion Engines.

### Boiler

6. The following requirements shall apply to the auxiliary boiler (EPN BLR-AUX1):
  - A. Except where provided otherwise in paragraph **Error! Reference source not found.** of this Special Condition, emissions of NO<sub>x</sub> and CO the auxiliary boiler shall not exceed the following values:

Pollutant	Emission Limit	Averaging Period
NO <sub>x</sub>	0.010 lb/MMBtu	1-hr
CO	50 ppmvd	1-hr

The concentration of a pollutant in the exhaust of the boiler shall be evaluated on a dry basis, corrected to 3% oxygen.

- B. Compliance with the NO<sub>x</sub> and CO emission limits of paragraph A shall be demonstrated through use of CEMS in accordance with Special Condition Nos. 25 and 26.
- C. The auxiliary boiler is exempt from NO<sub>x</sub> and CO operating requirements specified in paragraph A until the date on which the initial performance test is completed or required to be completed, whichever comes first, in accordance with Special Condition No. 27, provided the emission rates for this facility as authorized in this permit's maximum allowable emission rates table are not exceeded.

This exemption also applies during planned startup and shutdown if the following criteria are satisfied:

- (1) The emission rates for this facility as authorized in this permit's maximum allowable emission rates table 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.
- (3) The time it takes to complete the shutdown does not exceed 4 hours.

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.

### Heaters

- 7. The following requirements shall apply to the Fired Process Heater 1 (EPN H-201), the Steam Superheater 1 (EPN H-201), the Fired Process Heater 2 (EPN H-203), and the Steam Superheater 2 (EPN H-203):

- A. Except where provided otherwise in paragraph D of this Special Condition, emissions of NO<sub>x</sub>, CO, and NH<sub>3</sub> from each heater shall not exceed the following values.

Pollutant	Emission Limit	Averaging Period
NO <sub>x</sub>	0.010 lb/MMBtu	1-hr
CO	50 ppmvd	1-hr
NH <sub>3</sub>	10 ppmvd	1-hr

The concentration of a pollutant in the exhaust of a process heater shall be evaluated on a dry basis, corrected to 3% oxygen.

- B. Compliance with the NO<sub>x</sub> and CO emission limits of paragraph A shall be demonstrated through use of CEMS in accordance with Special Condition Nos. 25 and 26.
- C. Compliance with the NH<sub>3</sub> emission limits of paragraph A shall be continuously demonstrated through use of a CEMS in accordance with Special Condition Nos. 25 and 26.
- D. The heaters are exempt from NO<sub>x</sub> and CO operating requirements specified in paragraph A until the date on which the initial performance test is completed or required to be completed, whichever comes first, in accordance with Special Condition No. 27, provided the emission rates for this facility as authorized in this permit's maximum allowable emission rates table are not exceeded.

This exemption also applies during planned startup and shutdown if the following criteria are satisfied:

- (1) The emission rates for these facilities as authorized in this permit's maximum allowable emission rates table 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.
- (3) The time it takes to complete the shutdown does not exceed 4 hours.

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.

8. The following requirements shall apply to the Startup Heater 1 (EPN H-590) and the Startup Heater 2 (EPN H-591):

- A. Emissions of NO<sub>x</sub> and CO from each heater shall not exceed the following values.

Pollutant	Emission Limit	Averaging Period
NO <sub>x</sub>	0.010 lb/MMBtu	1-hr
CO	50 ppmvd	1-hr

The concentration of a pollutant in the exhaust of a heater shall be evaluated on a dry basis, corrected to 3% oxygen.

- B. Compliance with the NO<sub>x</sub> and CO emission limits of paragraph A shall be demonstrated through the stack tests performed per Special Condition No. 27. Compliance with the corresponding NO<sub>x</sub> and CO mass emission rates will be demonstrated for each unit operating day by multiplying the stack test results by the fuel use recorded in accordance with Special Condition No. 23 and the heat content of the fuel as established by Special Condition No. 24.
- C. The heaters are each limited to 48 hours of operation per year.

### Flares

9. The flares (EPNs FL-1, FL-2, FL-3, FL-4, and FL-5) shall be designed and operated in accordance with the following requirements:

- A. The flare systems shall be designed such that the combined assist natural gas and waste stream to each flare meets the 40 CFR § 60.18 specifications of minimum heating value and maximum tip velocity at all times when emissions may be vented to them.

The heating value and velocity requirements shall be satisfied during operations authorized by this permit. Flare testing per 40 CFR § 60.18(f) may be requested by the appropriate regional office to demonstrate compliance with these requirements.

- B. The flare shall be operated with a flame present at all times and/or have a constant pilot flame. The pilot flame shall be continuously monitored by a thermocouple, infrared monitor, or ultraviolet monitor. The time, date, and duration of any loss of pilot flame shall be recorded. Each monitoring device shall be accurate to, and shall be calibrated at a frequency in accordance with, the manufacturer's specifications.
- C. The flare shall be operated with no visible emissions except periods not to exceed a total of five minutes during any two consecutive hours. This shall be ensured by the use of air assist to the flare.

- D. The permit holder shall install a continuous flow monitor and calorimeter that provide a record of the vent stream flow and composition (total VOC or NH<sub>3</sub>, or Btu content) to the flare. The flow monitor sensor and analyzer sample points shall be installed in the vent stream as near as possible to the flare inlet such that the total vent stream to the flare is measured and analyzed. Readings shall be taken at least once every 15 minutes and the average hourly values of the flow and Btu content shall be recorded each hour.

The monitors shall be calibrated or have a calibration check performed on an annual basis to meet the following accuracy specifications: the flow monitor shall be  $\pm 5.0\%$ , temperature monitor shall be  $\pm 2.0\%$  at absolute temperature, and pressure monitor shall be  $\pm 5.0$  mm Hg.

The calorimeter shall be calibrated, installed, operated, and maintained, in accordance with manufacturer recommendations, to continuously measure and record the net heating value of the gas sent to the flare, in British thermal units/standard cubic foot of the gas.

The monitors and analyzers shall operate as required by this section at least 95% of the time when the flare is operational, averaged over a rolling 12 month period. Flared gas net heating value and actual exit velocity determined in accordance with 40 CFR §§60.18(f)(3) and 60.18(f)(4) shall be recorded at least once every hour.

### Fuel Gas

10. Combustion units are subject to the following requirements for fuel sulfur:

- A. The process heaters (EPNs H-201 and H-203) and steam superheaters (FINs/EPNs H-202/H-201 and H-204/H-203) shall be fired with natural gas and/or process gas.
- B. The assist gas and pilot gas for the flares (EPNs FL-1, FL-2, FL-3, FL-4, and FL-5) shall be natural gas.
- C. The auxiliary boiler (EPN BLR-AUX1) shall be fired with natural gas and/or high-hydrogen fuel gas.
- D. Natural gas and plant fuel gas shall have a total sulfur content not to exceed 0.2 grains per 100 dscf on a rolling 12-month average.
- E. Compliance with the requirements of paragraph D of this Special Condition shall be verified through sampling of fuel gas at least semi-annually. Fuel gas streams identified in paragraph D may be sampled individually, or a representative sample of blended fuel gas may be taken from the fuel gas header.

For natural gas, tariff sheets documenting the sulfur content of the fuel may be retained in lieu of performing sampling.

### Visible Emissions

11. Opacity of emissions from each boiler, process and startup heater, and emergency engine authorized by this permit shall not exceed 5 percent averaged over any six minute period.

Opacity shall be determined by EPA Test Method 9 during the initial compliance testing and at least once per year thereafter. In lieu of performing a required opacity test, the permit holder may verify that there are no visible emissions as determined by EPA Test Method 22.

**Compliance Assurance Monitoring**

12. The following requirements apply to capture systems for the flares (EPNs FL-1, FL-2, FL-3, FL-4, and FL-5).
- A. Either conduct a once a month visual, audible, and/or olfactory inspection of the capture system to verify there are no leaking components in the capture system; or verify the capture system is leak-free by inspecting in accordance with 40 CFR Part 60, Appendix A, Test Method 21 once a year. Leaks shall be indicated by an instrument reading greater than or equal to 500 ppmv above background.
  - B. If there is a bypass for the control device, comply with either of the following requirements:
    - (1) Install a flow indicator that records and verifies zero flow at least once every fifteen minutes immediately downstream of each valve that if opened would allow a vent stream to bypass the control device and be emitted, either directly or indirectly, to the atmosphere; or
    - (2) Once a month, inspect the valves, verifying that the position of the valves and the condition of the car seals that prevent flow out the bypass.

A bypass does not include authorized analyzer vents, highpoint bleeder vents, low point drains, or rupture discs upstream of pressure relief valves if the pressure between the disc and relief valve is monitored and recorded at least weekly. A deviation shall be reported if the monitoring or inspections indicate bypass of the control device when it is required to be in service per this permit.
  - C. The date and results of each inspection performed pursuant to paragraphs A and B above shall be recorded. If the results of any inspection are not satisfactory, the deficiencies shall be recorded, and the permit holder shall promptly take necessary corrective action, recording each action with the date completed.

**Storage Tanks**

13. Storage tank throughput and service shall be limited to the following:

Tank Identifier	Service	Fill Rate (gallons/hour)	Rolling 12 Month Throughput (gallons)
TK-1	Diesel	7,680	7,686
TK-2	Diesel	7,680	7,686
TK-3A	Methyl diethanolamine (MDEA)	768,810	839,118
TK-3B	MDEA	768,810	839,118
TK-4A	MDEA	50,190	2,585,016
TK-4B	MDEA	50,190	2,585,016
TK-5A	MDEA	18,018	155,106
TK-5B	MDEA	18,018	155,106



TK-WW1	Wastewater	17,820	129,999,996
TK-WW2	Wastewater	17,820	129,999,996
TK-WW3	Wastewater	319,440	2,736,006
TK-SW1	Contact Storm Water	319,440	338,000

14. Storage tanks are subject to the following requirements:

- A. Except for labels, logos, etc. not to exceed 15 percent of the tank total surface area, uninsulated tank exterior surfaces exposed to the sun shall be white or unpainted aluminum. Storage tanks must be equipped with permanent submerged fill pipes.
- B. Tanks T-801, T-802, T-803, and T-804 shall be limited to the storage of ammonia, and shall operate with a boil off gas (BOG) system to compress, condense, and return vapors to the tanks. For tank MSS, these tanks will be routed to and controlled by the ammonia storage flare (EPN FL-3).
- C. The permit holder shall maintain an emissions record which includes calculated emissions of VOC and NH<sub>3</sub> from all atmospheric storage tanks during the previous calendar month and the past consecutive 12 month period. The record shall include tank identification number, control method used, tank capacity in gallons, name of the material stored, VOC molecular weight, stored material's monthly average temperature in degrees Fahrenheit, VOC or NH<sub>3</sub> partial vapor pressure at the monthly average material temperature of the stored material in pounds per square inch (psi), absolute (psia), material throughput for the previous month and year-to-date. Records of stored material's monthly average temperature are not required to be kept for unheated tanks which receive liquids that are at or below ambient temperatures.  
  
Emissions from tanks shall be calculated using the methods that were used to determine the MAERT limits in the permit application PI-1 dated October 12, 2023. Sample calculations from the application shall be attached to a copy of this permit at the plant site.
- D. The holder of this permit shall maintain the temperature of the liquid and pressure in Tanks T-801, T-802, T-803, and T-804 between -28°F and -23.8°F, and 0.5-1.0 psi, gauge (psig), respectively. The tank temperature and pressure shall be continuously monitored, and the temperature and pressure shall be recorded daily and during tank filling.

The temperature monitor shall be calibrated on an annual basis to meet an accuracy specification of ±0.75 percent of the temperature being measured expressed in degrees Celsius or ± 2.5°C. Up to 5 percent invalid or missing monitoring data is acceptable on a rolling 12 month basis provided it is only generated when the monitor is broken down, out-of-control (producing inaccurate data); being repaired, having maintenance performed, or being calibrated. The data availability shall be calculated as the total tank operating hours for which quality assured data was recorded divided by the total tank hours in service. Invalid data generated due to other reasons is not allowed. The measurements missed shall be estimated using engineering judgement and the methods used recorded.

**Cooling Towers**

- 15. The cooling towers' (EPNs CTWR1 and CTWR2) water shall be monitored monthly for NH<sub>3</sub> with an air stripping system meeting the requirements of the TCEQ Sampling Procedures Manual,

Appendix P (dated January 2003 or a later edition) or an approved equivalent sampling method approved for NH<sub>3</sub>. The results of the monitoring, cooling water flow rate and maintenance activities on the cooling water system shall be recorded. The monitoring results and cooling water hourly mass flow rate shall be used to determine cooling tower hourly NH<sub>3</sub> emissions. The rolling 12 month cooling water emission rate shall be recorded on a monthly basis and be determined by summing the NH<sub>3</sub> emissions between NH<sub>3</sub> monitoring periods over the rolling 12 month period. The emissions between NH<sub>3</sub> monitoring periods shall be obtained by multiplying the total cooling water mass flow between cooling water monitoring periods by the higher of the two NH<sub>3</sub> monitored results.

16. The cooling towers (EPNs CTWR1 and CTWR2) shall be operated and monitored in accordance with the following:
- A. The cooling towers shall each be equipped with drift eliminators having manufacturer's design assurance of 0.0005% drift or less. Drift eliminators shall be maintained and inspected at least annually. The permit holder shall maintain records of all inspections and repairs.
  - B. Total dissolved solids (TDS) shall not exceed 43,750 parts per million by weight (ppmw) on an hourly average and 36,000 ppmw on an annual average. Dissolved solids in the cooling water drift are considered to be emitted as PM, PM<sub>10</sub>, and PM<sub>2.5</sub> as represented in the permit application calculations.
  - C. Cooling towers shall be analyzed for particulate emissions using one of the following methods:
    - (1) Cooling water shall be sampled at least once per day for total dissolved solids (TDS); or
    - (2) TDS monitoring may be reduced to weekly if conductivity is monitored daily and TDS is calculated using a ratio of TDS-to-conductivity (in ppmw per  $\mu\text{mho/cm}$  or ppmw/siemens). The ratio of TDS-to-conductivity shall be determined by concurrently monitoring TDS and conductivity on a weekly basis. The permit holder may use the average of two consecutive TDS-to-conductivity ratios to calculate daily TDS; or
    - (3) TDS monitoring may be reduced to quarterly if conductivity is monitored daily and TDS is calculated using a correlation factor established for each cooling tower. The correlation factor shall be the average of nine consecutive weekly TDS-to-conductivity ratios determined using C(2) above provided the highest ratio is not more than 10% larger than the smallest ratio.
    - (4) The permit holder shall validate the TDS-to-conductivity correlation factor once each calendar quarter. If the ratio of concurrently sampled TDS and conductivity is more than 10% higher or lower than the established factor, the permit holder shall increase TDS monitoring to weekly until a new correlation factor can be established.
  - D. A sample of cooling tower water shall be taken from the circulated water stream(s) entering the cooling tower. The analysis shall be conducted using the approved methods below:
    - (1) The analysis method for TDS shall be EPA Method 160.1, ASTM D5907, or SM 2540 C [SM - 19th edition of Standard Methods for Examination of Water]. Water samples should be capped upon collection, and transferred to a laboratory area for analysis.
    - (2) The analysis method for conductivity shall be either ASTM D1125-14 Test Method A (field or routine laboratory testing) or ASTM D1125-14 Test Method B (continuous monitor). The analysis may be conducted at the sample site or with a calibrated

process conductivity meter. If a conductivity meter is used, it shall be calibrated at least annually. Documentation of the method and any associated calibration records shall be maintained.

- (3) Alternate sampling and analysis methods may be used to comply with D(1) and D(2) with written approval from the TCEQ Regional Director. If approved by the TCEQ Regional Director, the permit holder shall submit a permit application to incorporate the alternative sampling and analysis method into the permit within 2 months of the date of written approval.
  - (4) Records of all instrument calibrations and test results and process measurements used for the emission calculations shall be retained.
- E. Emission rates of PM, PM<sub>10</sub> and PM<sub>2.5</sub> shall be calculated using the measured TDS and the ratio or correlation of TDS to conductivity measurements, the design drift rate and the daily maximum and average actual cooling water circulation rate for the short term and annual average rates. Alternately, the design maximum circulation rate may be used for all calculations. Emission records shall be updated monthly.
- F. The actual cooling water circulation rate shall be measured at least hourly. Measurements shall be reduced to an hourly average and recorded for use in emission calculation.

#### **Wastewater Treatment**

17. Process wastewater shall be immediately directed to a covered system. All lift stations, manholes, junction boxes, conveyances, and any other wastewater facilities shall be covered to minimize emissions.
18. The daily total wastewater flow into the wastewater treatment plant shall be monitored and recorded. The rolling 12 month wastewater flow shall be totaled on a monthly basis.

#### **Emergency Engines**

19. The following requirements apply to the emergency generators (EPNs EG-1 and EG-2) and the emergency firewater pumps (EPNs FW-PUMP1, FW-PUMP2, and FW-PUMP3):
  - A. Fuel for each engine shall be limited to ultra-low sulfur diesel (ULSD) containing no more than 15 ppmw total sulfur.
  - B. Each engine shall be limited to 100 hours per year during non-emergency situations, as defined at 40 CFR § 63.6640(f).
  - C. Each engine shall be equipped with a non-resettable hour meter.
  - D. The emergency generator shall satisfy the Tier 2 exhaust emission standards specified at Appendix I to 40 CFR Part 1039.
  - E. Each firewater pump shall satisfy the Tier 3 exhaust emission standards specified at Appendix I to 40 CFR Part 1039.
  - F. Compliance with the emission limits of paragraph D and E of this Special Condition shall be demonstrated by retaining a copy of the manufacturers' certificate of conformity.

## Fugitives

### ***Piping, Valves, Connectors, Pumps, Agitators, and Compressors – 28VHP***

20. The following requirements apply to piping, valves, connectors, pumps, agitators, and compressors containing or in contact with fluids that could reasonably be expected to contain greater than or equal to 10 weight percent VOC at any time.

- A. The requirements of paragraphs F and G shall not apply (1) where the VOC has an aggregate partial pressure or vapor pressure of less than 0.044 psia at 68°F or (2) operating pressure is at least 5 kilopascals (0.725 psi) below ambient pressure. 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:

- piping and instrumentation diagram (PID);
  - a written or electronic database or electronic file;
  - color coding;
  - a form of weatherproof identification; or
  - 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 Paragraph 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, both valves shall be

closed. If the isolation of equipment for hot work or 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;

- (1) a cap, blind flange, plug, or second valve must be installed on the line or valve;  
or
- (2) 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 within the 72-hour 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.

- 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. If a relief valve is equipped with rupture disc, a pressure-sensing device shall be installed between the relief valve and rupture disc to monitor disc integrity.

A check of the reading of the pressure-sensing device to verify disc integrity shall be performed at least quarterly and recorded in the unit log or equivalent. Pressure-sensing devices that are continuously monitored with alarms are exempt from recordkeeping requirements specified in this paragraph. All leaking discs shall be replaced at the earliest opportunity but no later than the next process shutdown.

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. A calculated average is not required when all of the compounds in the mixture have a response factor less than 10 using methane. 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 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 and a record of the attempt shall be maintained.
- I. A leaking component shall be repaired as soon as practicable, but no later than 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 shut down as calculated in accordance with 30 TAC 115.782 (c)(1)(B)(i)(I) or 500 pounds, whichever is greater, the TCEQ Regional Manager and any local programs shall be notified and the TCEQ Executive Director may require early unit shut down 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. The instrument monitoring record shall include the time that monitoring took place for no less than 95% of the instrument readings recorded. Records of physical inspections shall be noted in the operator's log or equivalent.
- K. Alternative monitoring frequency schedules of 30 TAC 115.352 - 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 and 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.

**28CNTQ (Connectors Inspected Quarterly)**

- 21. In addition to the weekly physical inspection required by Special Condition 20.E, all accessible connectors in gas/vapor and light liquid service shall be monitored quarterly with an approved gas analyzer in accordance with Items 20.F thru 20.J of Special Condition No. 20.

- A. Allowance for reduced monitoring frequencies.
- (1) The frequency of monitoring may be reduced from quarterly to semiannually if the percent of connectors leaking for two consecutive quarterly monitoring periods is less than 0.5 percent.
  - (2) The frequency of monitoring may be reduced from semiannually to annually if the percent of connectors leaking for two consecutive semiannual monitoring periods is less than 0.5 percent.
- B. If the percent of connectors leaking for any semiannual or annual monitoring period is 0.5 percent or greater, the facility shall revert to quarterly monitoring until the facility again qualifies for the alternative monitoring schedules previously outlined in this paragraph. The percent of connectors leaking used in paragraph A shall be determined using the following formula:

$$\frac{C_i + C_s}{C_t} \times 100 = C_p$$

Where:

- $C_i$  = the number of connectors found leaking by the end of the monitoring period, either by Method 21 or sight, sound, and smell.
- $C_s$  = the number of connectors for which repair has been delayed and are listed on the facility shutdown log.
- $C_t$  = the total number of connectors in the facility subject to the monitoring requirements, as of the last day of the monitoring period, not including nonaccessible and unsafe-to-monitor connectors.
- $C_p$  = the percentage of leaking connectors for the monitoring period.

***Piping, Valves, Pumps, and Compressors in Contact with Ammonia – 28AVO***

22. Except as may be provided for in the Special Conditions of this permit, the following requirements apply to the above-referenced equipment:
- A. Audio, olfactory, and visual checks for leaks within the operating area shall be made twice per shift.
  - B. As soon as possible, but no later than one hour upon detection of a leak, plant personnel shall take at least one of the following actions:
    - (1) Isolate the leak.
    - (2) Commence repair or replacement of the leaking component.
    - (3) Use a leak collection/containment system to prevent the leak until repair or replacement can be made if immediate repair is not possible.

Date and time of each inspection shall be noted in the operator's log or equivalent. Records shall be maintained at the plant site of all repairs and replacements made due to leaks. These records shall be made available to representatives of the Texas Commission on Environmental Quality (TCEQ) upon request.

### Continuous Determination of Compliance

23. The permit holder shall install and operate a fuel flow meter to measure the gas fuel usage for each device listed in Special Condition Nos. 6 through 8. The monitored data shall be reduced to an hourly average flow rate at least once each day, using a minimum of four equally-spaced data points from each one-hour period. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or at least annually, whichever is more frequent, and shall be accurate to within 5 percent. In lieu of monitoring fuel flow, the permit holder may monitor stack exhaust flow using the flow monitoring specifications of 40 CFR Part 60, Appendix B, Performance Specification 6 or 40 CFR Part 75, Appendix A.

Up to 5 percent invalid or missing monitoring data is acceptable on a rolling 12 month basis provided it is only generated when the monitor is broken down, out-of-control (producing inaccurate data); being repaired, having maintenance performed, or being calibrated. The data availability shall be calculated as the total measured hours for which quality assured data was recorded divided by the total equipment hours in service. Invalid data generated due to other reasons is not allowed. The measurements missed shall be estimated using engineering judgement and the methods used recorded.

24. The permit holder shall install and operate an analyzer which continuously monitors the heat content of fuel supplied to each device listed in Special Condition Nos. 6 through 8. For sources which receive fuel from a common fuel gas header, a single analyzer may be installed in the fuel gas header.
25. The permit holder shall install, calibrate, and maintain a continuous emission monitoring system (CEMS) to measure and record the in-stack concentration of O<sub>2</sub>, CO, NO<sub>x</sub>, and NH<sub>3</sub> from the auxiliary boiler and heaters, as applicable, as required by Special Condition Nos. 6 through 7.
26. Each CEMS required under this permit shall satisfy the following requirements:
- A. The CEMS shall meet the design and performance specifications, pass the field tests, and meet the installation requirements and the data analysis and reporting requirements specified in the applicable Performance Specification Nos. 1 through 9, Title 40 Code of Federal Regulation Part 60 (40 CFR Part 60), Appendix B. If there are no applicable performance specifications in 40 CFR Part 60, Appendix B, contact the TCEQ Office of Air, Air Permits Division for requirements to be met.
  - B. Subparagraph (1) below applies to sources subject to the quality-assurance requirements of 40 CFR Part 60, Appendix F; section 2 applies to all other sources:
    - (1) The permit holder shall assure that the CEMS meets the applicable quality-assurance requirements specified in 40 CFR Part 60, Appendix F, Procedure 1. Relative accuracy exceedances, as specified in 40 CFR Part 60, Appendix F, Section 5.2.3 and any CEMS downtime shall be reported to the appropriate TCEQ Regional Manager, and necessary corrective action shall be taken. Supplemental stack concentration measurements may be required at the discretion of the appropriate TCEQ Regional Manager.
    - (2) 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 the applicable Performance Specification Nos. 1 through 9, 40 CFR Part 60, Appendix B, or as specified by the TCEQ if not specified in Appendix B. Zero and span is not required on



weekends and plant holidays if instrument technicians are not normally scheduled on those days.

Each monitor shall be quality-assured at least quarterly using Cylinder Gas Audits (CGA) in accordance with 40 CFR Part 60, Appendix F, Procedure 1, Section 5.1.2, with the following exception: a relative accuracy test audit (RATA) is not required once every four quarters (i.e., four successive quarterly CGA may be conducted). An equivalent quality-assurance method approved by the TCEQ may also be used. Successive quarterly audits shall occur no closer than two months.

All CGA exceedances of +15 percent accuracy indicate that the CEMS is out of control.

- C. The 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. The individual average concentrations shall be reduced to units of ppmvd, lb/MMBtu, and/or lb/hr, as applicable at least once every week as follows:
- (1) The measured 1-hr average concentration (in units of ppmvd) from the CEMS shall be converted to a dry basis and corrected to the reference oxygen concentration.
  - (2) The converted concentration, corrected for oxygen, shall be converted to an emissions factor (in units of lb/MMBtu) by using an appropriate F-factor determined as specified in EPA Method 19, Equation 19-13, determined using the measured hydrogen content of the fuel gas.
  - (3) The emission rate (in units of lb/hr) shall be determined by multiplying the emission factor by the fuel flow rate and fuel heat content measured as required under Special Condition Nos. 23 and 0.
  - (4) In case the permit holder elects to monitor stack exhaust flow, the emission rate (in units of lb/hr) shall be determined by multiplying the measured concentration (converted and corrected as needed) by the exhaust flow rate; and the emission factor (in units of lb/MMBtu) shall be determined by dividing the emission rate by the monitored fuel flow rate, using fuel flow rate and fuel heat content data measured as required under Special Condition Nos. 23 and 0.
- D. All monitoring data and quality-assurance data shall be maintained by the source. The data from the CEMS may, at the discretion of the TCEQ, be used to determine compliance with the conditions of this permit.
- E. The appropriate TCEQ Regional Office shall be notified at least 30 days prior to any required RATA in order to provide them the opportunity to observe the testing.
- F. Quality-assured (or valid) data must be generated when the source generating emissions is operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration is exempted provided it does not exceed 5 percent of the time (in minutes) that the source generating emissions operated over the previous rolling 12-month period. The measurements missed shall be estimated using engineering judgment and the methods used recorded. Options to increase system reliability to an acceptable value, including a redundant CEMS, may be required by the TCEQ Regional Manager.

### Initial Determination of Compliance

27. The permit holder shall perform stack sampling and other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the auxiliary boiler and heaters identified in Special Condition Nos. 6-8 to demonstrate compliance with Special Condition Nos. 1, 6, 7, and 8. The permit holder is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense. Sampling shall be conducted in accordance with the appropriate procedures of the TCEQ Sampling Procedures Manual and the U.S. EPA Reference Methods.

Requests to waive testing for any pollutant specified in this condition shall be submitted to the TCEQ Office of Air, Air Permits Division. Test waivers and alternate/equivalent procedure proposals for Title 40 Code of Federal Regulation Part 60 (40 CFR Part 60) testing which must have EPA approval shall be submitted to the TCEQ Regional Director.

- A. The appropriate TCEQ Regional Office shall be notified not less than 45 days prior to sampling. The notice shall include:

- (1) Proposed date for pretest meeting.
- (2) Date sampling will occur.
- (3) Name of firm conducting sampling.
- (4) Type of sampling equipment to be used.
- (5) Method or procedure to be used in sampling.
- (6) Description of any proposed deviation from the sampling procedures specified in this permit or TCEQ/EPA sampling procedures.
- (7) Procedure/parameters to be used to determine worst case emissions.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for the test reports. The TCEQ Regional Director must approve any deviation from specified sampling procedures.

- B. Air contaminants to be tested for include (but are not limited to) CO, NO<sub>x</sub>, and NH<sub>3</sub> if the tested source is subject to a limit for that air contaminant.
- C. Sampling shall occur within 60 days after achieving the maximum operating rate for the facility being sampled, but no later than 180 days after initial start-up of the facility (or increase in production, as appropriate) and at such other times as may be required by the TCEQ Executive Director. Requests for additional time to perform sampling shall be submitted to the appropriate regional office.
- D. Firing rate and any other primary operating parameters that affect the emission rate shall be monitored and recorded during the stack test. Any additional parameters shall be determined at the pretest meeting and shall be stated in the sampling report. Permit conditions and parameter limits may be waived during stack testing performed under this condition if the proposed condition/parameter range is identified in the test notice specified in paragraph A and accepted by the TCEQ Regional Office. Permit allowable emissions and emission control requirements are not waived and still apply during stack testing periods.

During subsequent operations, if the firing rate is greater than that recorded during the test period, stack sampling shall be performed at the new operating conditions within 120 days, except if each individual stack test result from the last successful stack test demonstrated that the actual emissions are less than 80% of the MAERT emission limits, then subsequent operations may include up to a 5% increase in the firing rate for the heater without requiring stack sampling at the new operating conditions unless required by the regional office. This sampling may be waived by the TCEQ Air Section Manager for the region.

- E. Copies of the final sampling report shall be forwarded to the offices below within 60 days after sampling is completed. Sampling reports shall comply with the attached provisions entitled "Chapter 14, Contents of Sampling Reports" of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows:
  - One copy to the appropriate TCEQ Regional Office.
  - One copy to each local air pollution control program.
- F. Sampling ports and platform(s) shall be incorporated into the design of (source stack and EPN) according to the specifications set forth in the attachment entitled "Chapter 2, Guidelines for Stack Sampling Facilities" of the TCEQ Sampling Procedures Manual. Alternate sampling facility designs must be submitted for approval to the TCEQ Regional Director.

#### **Planned Maintenance, Startup, and Shutdown**

- 28. This permit authorizes the planned maintenance, startup, and shutdown (MSS) activities summarized in the MSS Activity Summary (Special Condition No. 29.C).

Special Condition No. 29.A identifies the inherently low emitting MSS activities that may be performed at the plant as part of plant operation. Emissions from activities identified in Special Condition No. 29.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 Special Condition No. 29.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.

The performance of each planned MSS activity not identified in Special Condition No. 29.A and the emissions associated with it 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.
- 29. All MSS emissions shall be summed monthly and the rolling 12-month emissions shall be updated on a monthly basis. This permit authorizes emissions from the following temporary facilities used to

support planned MSS activities at permanent site facilities: frac tanks, containers, and vacuum trucks. 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 Special Condition, and (c) does not operate as a replacement for an existing authorized facility.

Planned startup and shutdown emissions due to the activities identified in this Special Condition are authorized from the facilities and temporary equipment and control devices identified in the Special Conditions of the permit.

A. Inherently low emitting maintenance activities

- Aerosol cans
- Instrumentation/analyzer maintenance
- Meter proving
- Maintenance on water treatment systems
- Soap and other aqueous based cleaners

B. Routine maintenance activities

- Pump repair and replacement
- Fugitive component (valve, pipe, flange) repair and replacement

C. MSS Activity Summary

Facility	Activity	EPN
All facilities	Depressurize, purge, and drain equipment following shutdown	MSS-ATM
Fixed roof storage tanks	Ventilation, cleaning and inspection	MSS-TANK
Vacuum trucks	Operate vacuum truck	MSS-ATM
Frac Tanks	Operate frac tank	MSS-ATM
Inherently low emitting activities	See paragraph A	MSS-ATM
Routine maintenance activities	See paragraph B	MSS-ATM

30. Process units and facilities, with the exception of those identified in Special Condition Nos. 29.A, 32, and 34 shall be depressurized, emptied, degassed, and placed in service in accordance with the following requirements.

- 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 Special Condition No. 29.29.C, 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 No. 31. 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 sample shall be taken from inside the vessel so as to minimize any air or dilution from the entry point. 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.

31. For compliance with Special Condition Nos. 30, 32, and 33, air contaminant concentration in the vapor space shall be measured using an instrument/detector meeting one set of requirements specified below.
- 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 (RF) 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 (RF) 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:  
VOC Concentration = Concentration as read from the instrument\*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.
- 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.

The detector shall be calibrated within 30 days of use 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.

- (1) 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.
- (2) 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.

32. Fixed roof storage tanks are subject to the following requirements:

- A. The tank shall not be opened or ventilated without control, unless the air circulation in the tank vapor space is minimized and meets the requirements of (1) and (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 (8260B or 5030 with 8015 from SW-846 may also be used).
    - (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 No. 31.
  - (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 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 vapor space 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 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 No. 31.
  - (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.
- D. The following records shall be maintained:
- (1) start and completion of controlled degassing, and total volumetric flow,
  - (2) 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,
  - (3) if there is liquid in the tank, VOC partial pressure of liquid, start and completion of uncontrolled degassing, and total volumetric flow,
  - (4) the estimated quantity of each air contaminant, or mixture of air contaminants, emitted between events (1) and (3) with the data and methods used to determine it. The emissions associated with degassing activities shall be calculated using the methods described in Section 7.1.3.4 of AP-42 "Compilation of Air Pollution Emission Factors, Chapter 7 - Storage of Organic Liquids" dated June 2020 and the permit application.
33. The following requirements apply to vacuum and air mover truck operations to support planned MSS at this site:
- A. Prior to initial use, identify any liquid in the truck. Record the liquid level and document the VOC partial pressure. After each liquid transfer, identify the liquid, the volume transferred, and its VOC partial pressure.
  - B. If vacuum pumps or blowers are operated when liquid is in or being transferred to the truck, the following requirements apply:



- (1) If the VOC partial pressure of the liquid in or being transferred to the truck is greater than 0.50 psi at 95°F, the vacuum/blower exhaust shall be routed to a control device or a controlled recovery system.
  - (2) Equip fill line intake with a “duckbill” or equivalent attachment if the hose end cannot be submerged in the liquid being collected.
  - (3) A daily record containing the information identified below is required for each vacuum truck in operation at the site each day.
    - (a) For each liquid transfer made with the vacuum operating, record the duration of any periods when air may have been entrained with the liquid transfer. The reason for operating in this manner and whether a “duckbill” or equivalent was used shall be recorded. Short, incidental periods, such as those necessary to walk from the truck to the fill line intake, do not need to be documented.
    - (b) If the vacuum truck exhaust is controlled with a control device other than an engine or oxidizer, VOC exhaust concentration upon commencing each transfer, at the end of each transfer, and at least every hour during each transfer shall be recorded, measured using an instrument meeting the requirements of Special Condition No. 31.A or B.
  - C. Record the volume in the vacuum truck at the end of the day, or the volume unloaded, as applicable.
  - D. The permit holder shall determine the vacuum truck emissions each month using the daily vacuum truck records and the calculation methods utilized in the permit application. If records of the volume of liquid transferred for each pick-up are not maintained, the emissions shall be determined using the physical properties of the liquid vacuumed with the greatest potential emissions. Rolling 12 month vacuum truck emissions shall also be determined on a monthly basis.
  - E. If the VOC partial pressure of all the liquids vacuumed into the truck is less than 0.10 psi, this shall be recorded when the truck is unloaded or leaves the plant site and the emissions may be estimated as the maximum potential to emit for a truck in that service as documented in the permit application. The recordkeeping requirements in Special Condition 33.A through 33.D do not apply.
34. The following requirements apply to frac, or temporary, tanks and vessels used in support of MSS activities.
- A. The exterior surfaces of these tanks/vessels that are exposed to the sun shall be white or aluminum. This requirement does not apply to tanks/vessels that only vent to atmosphere when being filled, sampled, gauged, or when removing material.
  - 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 except when filling, sampling, gauging, or when removing material.
  - 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. This record must be updated by the last day of the month following. 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.
35. 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.
36. All permanent facilities must comply with all operating requirements, limits, and representations in the permits during planned startup and shutdown unless alternate requirements and limits are identified in this permit.
37. Control devices required by this permit for emissions from planned MSS activities are limited to the following:

Facility	EPN
Front End Flare 1	FL-1
Back End Flare 1	FL-2
Storage Flare	FL-3
Front End Flare 2	FL-4
Back End Flare 2	FL-5

The plant flare system is required to be operated in accordance with Special Condition No. 9.

#### **Disaster Prevention and Mitigation**

38. The holder of this permit shall comply with EPA regulations on Chemical Accident Prevention Provisions promulgated in 40 CFR Part 68. The Risk Management Plan (RMP) shall be submitted to the TCEQ Office of Air, Air Permits Division prior to the date this site first exceeds a threshold quantity of ammonia.

#### **Greenhouse Gas Emissions**

39. Permit holders must keep records sufficient to demonstrate compliance with 30 Texas Administrative Code § 116.164. If construction, a physical change or a change in method of operation results in Prevention of Significant Deterioration (PSD) review for criteria pollutants, then records shall be maintained that are sufficient to demonstrate the amount of emissions of GHGs from the source as a result of such construction, physical change or change in method of operation

does not require authorization under 30 TAC §116.164(a). If there is construction, a physical change or a change in the method of operation that will result in a net emission increase of 75,000 tpy or more CO<sub>2e</sub> greenhouse gas emissions are subject to PSD review.

40. Monitoring, quality assurance/quality control requirements, emission calculation methodologies, record keeping, and reporting requirements related to Greenhouse Gas (GHG) emissions shall adhere to the applicable requirements in 40 CFR Part 98 and in this permit.
41. Permittee shall calculate the CO<sub>2e</sub> emissions on a 12-month rolling basis, based on the procedures and Global Warming Potentials (GWP) contained in Greenhouse Gas Regulations, 40 CFR Part 98, Subpart A, Table A-1.
42. Records of emissions of GHG, and how they were determined, in compliance with Special Condition Nos. 39, 40, and 41 must be maintained by the holder of this permit in a form suitable for inspection for a period of five years after collection and must be made available upon request to representatives of the TCEQ, EPA, or any local air pollution control program having jurisdiction.

#### **Recordkeeping**

43. The records required by these special conditions shall be maintained in either hard copy or electronic format and shall be maintained for at least five years rather than the two-year period specified in General Condition No. 7. These records shall be made immediately available at the request of personnel from the TCEQ or any air pollution control agency with jurisdiction.

Date: \_\_\_\_\_ TBD \_\_\_\_\_

Emission Sources - Maximum Allowable Emission Rates

Permit Numbers 174275 and PSDTX1628

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)
BLR-AUX1	Auxiliary Boiler	VOC	1.01	0.75
		NO <sub>x</sub>	1.88	1.72
		CO	5.91	5.40
		PM	1.40	0.47
		PM <sub>10</sub>	1.40	0.47
		PM <sub>2.5</sub>	1.40	0.47
		SO <sub>2</sub>	0.11	0.10
H-201	Fired Process Heater 1	VOC	1.15	5.05
		NO <sub>x</sub>	4.40	12.87
		CO	9.81	42.97
		PM	1.31	2.36
		PM <sub>10</sub>	1.31	2.36
		PM <sub>2.5</sub>	1.31	2.36
		SO <sub>2</sub>	0.17	0.75
		NH <sub>3</sub>	1.13	4.94
H-201	Steam Superheater 1	VOC	1.71	7.48
		NO <sub>x</sub>	6.51	19.06
		CO	14.53	63.65
		PM	1.94	3.50
		PM <sub>10</sub>	1.94	3.50
		PM <sub>2.5</sub>	1.94	3.50
		SO <sub>2</sub>	0.26	1.12
		NH <sub>3</sub>	1.67	7.31

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
H-201	Train 1 Heaters Cap	VOC	2.86	12.53
		NO <sub>x</sub>	10.91	31.93
		CO	24.34	106.62
		PM	3.25	5.86
		PM <sub>10</sub>	3.25	5.86
		PM <sub>2.5</sub>	3.25	5.86
		SO <sub>2</sub>	0.43	1.87
		NH <sub>3</sub>	2.80	12.25
H-203	Fired Process Heater 2	VOC	1.15	5.05
		NO <sub>x</sub>	4.40	12.87
		CO	9.81	42.97
		PM	1.31	2.36
		PM <sub>10</sub>	1.31	2.36
		PM <sub>2.5</sub>	1.31	2.36
		SO <sub>2</sub>	0.17	0.75
		NH <sub>3</sub>	1.13	4.94
H-203	Steam Superheater 2	VOC	1.71	7.48
		NO <sub>x</sub>	6.51	19.06
		CO	14.53	63.65
		PM	1.94	3.50
		PM <sub>10</sub>	1.94	3.50
		PM <sub>2.5</sub>	1.94	3.50
		SO <sub>2</sub>	0.26	1.12
		NH <sub>3</sub>	1.67	7.31
H-203	Train 2 Heaters Cap	VOC	2.86	12.53
		NO <sub>x</sub>	10.91	31.93
		CO	24.34	106.62

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
		PM	3.25	5.86
		PM <sub>10</sub>	3.25	5.86
		PM <sub>2.5</sub>	3.25	5.86
		SO <sub>2</sub>	0.43	1.87
		NH <sub>3</sub>	2.80	12.25
H-590	Startup Heater 1	VOC	0.63	<0.01
		NO <sub>x</sub>	1.16	<0.01
		CO	3.68	0.01
		PM	0.86	<0.01
		PM <sub>10</sub>	0.86	<0.01
		PM <sub>2.5</sub>	0.86	<0.01
		SO <sub>2</sub>	0.07	<0.01
H-591	Startup Heater 2	VOC	0.63	<0.01
		NO <sub>x</sub>	1.16	<0.01
		CO	3.68	0.01
		PM	0.86	<0.01
		PM <sub>10</sub>	0.86	<0.01
		PM <sub>2.5</sub>	0.86	<0.01
		SO <sub>2</sub>	0.07	<0.01
FW-PUMP1	Diesel Fire Water Pump	VOC	4.41	0.22
		NO <sub>x</sub>	4.41	0.22
		CO	3.86	0.19
		PM	0.22	0.01
		PM <sub>10</sub>	0.22	0.01
		PM <sub>2.5</sub>	0.22	0.01
		SO <sub>2</sub>	<0.01	<0.01

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
FW-PUMP2	Diesel Fire Water Pump	VOC	4.41	0.22
		NO <sub>x</sub>	4.41	0.22
		CO	3.86	0.19
		PM	0.22	0.01
		PM <sub>10</sub>	0.22	0.01
		PM <sub>2.5</sub>	0.22	0.01
		SO <sub>2</sub>	<0.01	<0.01
FW-PUMP3	Diesel Fire Water Pump	VOC	4.41	0.22
		NO <sub>x</sub>	4.41	0.22
		CO	3.86	0.19
		PM	0.22	0.01
		PM <sub>10</sub>	0.22	0.01
		PM <sub>2.5</sub>	0.22	0.01
		SO <sub>2</sub>	<0.01	<0.01
EG-1	Diesel Emergency Generator 1	VOC	42.33	2.12
		NO <sub>x</sub>	42.33	2.12
		CO	23.15	1.16
		PM	1.32	0.07
		PM <sub>10</sub>	1.32	0.07
		PM <sub>2.5</sub>	1.32	0.07
		SO <sub>2</sub>	0.02	<0.01
EG-2	Diesel Emergency Generator 2	VOC	42.33	2.12
		NO <sub>x</sub>	42.33	2.12
		CO	23.15	1.16
		PM	1.32	0.07
		PM <sub>10</sub>	1.32	0.07
		PM <sub>2.5</sub>	1.32	0.07

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
		SO <sub>2</sub>	0.02	<0.01
FL-1	Front End Flare 1 - Pilot	VOC	0.01	0.04
		NO <sub>x</sub>	0.10	0.43
		CO	0.85	3.71
		SO <sub>2</sub>	<0.01	<0.01
FL-1	Front End Flare 1 - SU/SD	VOC	190.19	0.97
		NO <sub>x</sub>	386.18	3.97
		CO	3,194.74	24.80
		NH <sub>3</sub>	238.77	0.96
FL-1	Front End Flare 1	VOC	190.20	1.01
		NO <sub>x</sub>	386.28	4.40
		CO	3,195.59	28.51
		SO <sub>2</sub>	<0.01	<0.01
		NH <sub>3</sub>	238.77	0.96
FL-2	Back End Flare 1 - Pilot	VOC	0.01	0.04
		NO <sub>x</sub>	0.10	0.43
		CO	0.85	3.71
		SO <sub>2</sub>	<0.01	<0.01
FL-2	Back End Flare 1 - SU/SD	VOC	3.53	0.01
		NO <sub>x</sub>	21.68	0.09
		CO	36.87	0.15
		NH <sub>3</sub>	19.98	0.09
FL-2	Back End Flare 1	VOC	3.54	0.05
		NO <sub>x</sub>	21.78	0.52
		CO	37.72	3.86
		SO <sub>2</sub>	<0.01	<0.01
		NH <sub>3</sub>	19.98	0.09



Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
FL-3	Storage Flare - Pilot	VOC	0.01	0.03
		NO <sub>x</sub>	0.07	0.32
		CO	0.64	2.78
		SO <sub>2</sub>	<0.01	<0.01
FL-3	Storage Flare - SU/SD	NO <sub>x</sub>	53.55	9.48
		NH <sub>3</sub>	97.00	17.17
FL-3	Storage Flare	VOC	0.01	0.03
		NO <sub>x</sub>	53.62	9.80
		CO	0.64	2.78
		SO <sub>2</sub>	<0.01	<0.01
		NH <sub>3</sub>	97.00	17.17
FL-4	Front End Flare 2 - Pilot	VOC	0.01	0.04
		NO <sub>x</sub>	0.10	0.43
		CO	0.85	3.71
		SO <sub>2</sub>	<0.01	<0.01
FL-4	Front End Flare 2 - SU/SD	VOC	190.19	0.97
		NO <sub>x</sub>	386.18	3.97
		CO	3,194.74	24.80
		NH <sub>3</sub>	238.77	0.96
FL-4	Front End Flare 2	VOC	190.20	1.01
		NO <sub>x</sub>	386.28	4.40
		CO	3,195.59	28.51
		SO <sub>2</sub>	<0.01	<0.01
		NH <sub>3</sub>	238.77	0.96
FL-5	Back End Flare 2 - Pilot	VOC	0.01	0.04
		NO <sub>x</sub>	0.10	0.43
		CO	0.85	3.71

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
		SO <sub>2</sub>	<0.01	<0.01
FL-5	Back End Flare 2 - SU/SD	VOC	3.53	0.01
		NO <sub>x</sub>	21.68	0.09
		CO	36.87	0.15
		NH <sub>3</sub>	19.98	0.09
FL-5	Back End Flare 2	VOC	3.54	0.05
		NO <sub>x</sub>	21.78	0.52
		CO	37.72	3.86
		SO <sub>2</sub>	<0.01	<0.01
		NH <sub>3</sub>	19.98	0.09
CTWR1	Cooling Tower 1	PM	27.97	85.67
		PM <sub>10</sub>	0.12	0.36
		PM <sub>2.5</sub>	< 0.01	< 0.01
		NH <sub>3</sub>	1.96	8.58
CTWR2	Cooling Tower 2	PM	27.97	85.67
		PM <sub>10</sub>	0.12	0.36
		PM <sub>2.5</sub>	< 0.01	< 0.01
		NH <sub>3</sub>	1.96	8.58
TK-1	Diesel Storage Tank	VOC	0.28	<0.01
TK-2	Diesel Storage Tank	VOC	0.28	<0.01
TK-3A	MDEA Storage Tank 1	VOC	0.78	<0.01
TK-3B	MDEA Storage Tank 2	VOC	0.78	<0.01
TK-4A	MDEA Solution Prep Tank 1	VOC	0.05	<0.01
TK-4B	MDEA Solution Prep Tank 2	VOC	0.05	<0.01
TK-5A	MDEA Solution Drain Tank 1	VOC	0.02	<0.01
TK-5B	MDEA Solution Drain Tank 2	VOC	0.02	<0.01
TK-WW1	WW Equalization Tank	VOC	<0.01	<0.01

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
		NH <sub>3</sub>	0.01	<0.01
TK-WW2	WW Neutralization Tank	VOC	<0.01	<0.01
		NH <sub>3</sub>	0.01	<0.01
TK-WW3	Off-Spec Wastewater Tank	VOC	0.01	<0.01
		NH <sub>3</sub>	0.23	<0.01
TK-SW1	Contact Storm Water Tank	VOC	0.01	<0.01
		NH <sub>3</sub>	0.11	<0.01
VTCO2-1	Low Flow CO2 Vent 1	CO	0.03	0.12
VTCO2-2	High Flow CO2 Vent 1 (Provisional)	CO	5.68	12.27
VTCO2-2	High Flow CO2 Vent 1	CO	5.68	6.16
VTCO2-3	Low Flow CO2 Vent 2	CO	0.03	0.12
VTCO2-4	High Flow CO2 Vent 2 (Provisional)	CO	5.68	12.27
VTCO2-4	High Flow CO2 Vent 2	CO	5.68	6.16
FUG	Equipment Leak Fugitives (5)	VOC	0.08	0.34
		CO	2.20	9.62
		NH <sub>3</sub>	1.22	5.35
		H <sub>2</sub> S	0.20	0.87
MSS-TANK	MSS - Fixed Roof Tank Degassing	VOC	0.29	<0.01
MSS-ATM	MSS - Small Equipment Vapors	VOC	0.46	<0.01
		NH <sub>3</sub>	0.24	<0.01
MSS-ATM	MSS - Equipment Draining	VOC	0.03	<0.01
MSS-ATM	MSS - Large Equipment Vapors	VOC	5.67	0.02
		NH <sub>3</sub>	0.25	<0.01
MSS-ATM	MSS - Air Mover and Vacuum Truck	VOC	0.23	<0.01
MSS-ATM	MSS - Frac Tank Breathing and Working	VOC	0.05	0.01
MSS-ATM	Miscellaneous Inherently Low Emitting Maintenance Activities	VOC	4.60	0.29
		NH <sub>3</sub>	0.44	0.01

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
MSS-ATM	Uncontrolled MSS Emission Cap	VOC	11.04	0.33
		NH <sub>3</sub>	0.93	0.01

- (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
- NH<sub>3</sub> - ammonia
- (4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.
- (5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.

Date: TBD

Emission Sources - Maximum Allowable Emission Rates

Permit Number GHGPSDTX234

This table lists the maximum allowable emission rates of greenhouse gas (GHG) emissions, as defined in Title 30 Texas Administrative Code § 101.1, for all sources of GHG air contaminants on the applicant's property that are authorized 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 authorized by this permit.

Air Contaminants Data

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates
			TPY (4)
BLR-AUX1	Auxiliary Boiler	CO <sub>2</sub> (5)	20,109.24
		CH <sub>4</sub> (5)	0.38
		N <sub>2</sub> O (5)	0.04
		CO <sub>2</sub> e	20,130.00
H-201	Fired Process Heater 1	CO <sub>2</sub> (5)	150,121.62
		CH <sub>4</sub> (5)	2.83
		N <sub>2</sub> O (5)	0.28
		CO <sub>2</sub> e	150,276.66
H-201	Steam Superheater 1	CO <sub>2</sub> (5)	222,364.44
		CH <sub>4</sub> (5)	4.19
		N <sub>2</sub> O (5)	0.42
		CO <sub>2</sub> e	222,594.10
H-201	Train 1 Heaters Cap	CO <sub>2</sub> (5)	372,486.06
		CH <sub>4</sub> (5)	7.02
		N <sub>2</sub> O (5)	0.70
		CO <sub>2</sub> e	372,870.76
H-203	Fired Process Heater 2	CO <sub>2</sub> (5)	150,121.62
		CH <sub>4</sub> (5)	2.83
		N <sub>2</sub> O (5)	0.28
		CO <sub>2</sub> e	150,276.66
H-203	Steam Superheater 2	CO <sub>2</sub> (5)	222,364.44
		CH <sub>4</sub> (5)	4.19
		N <sub>2</sub> O (5)	0.42
		CO <sub>2</sub> e	222,594.10
H-203	Train 2 Heaters Cap	CO <sub>2</sub> (5)	372,486.06
		CH <sub>4</sub> (5)	7.02

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates
			TPY (4)
		N <sub>2</sub> O (5)	0.70
		CO <sub>2</sub> e	372,870.76
H-590	Startup Heater 1	CO <sub>2</sub> (5)	54.28
		CH <sub>4</sub> (5)	0.00102
		N <sub>2</sub> O (5)	0.0001
		CO <sub>2</sub> e	54.33
H-591	Startup Heater 2	CO <sub>2</sub> (5)	54.28
		CH <sub>4</sub> (5)	0.00102
		N <sub>2</sub> O (5)	0.0001
		CO <sub>2</sub> e	54.33
FW-PUMP1	Diesel Fire Water Pump	CO <sub>2</sub> (5)	9.98
		CH <sub>4</sub> (5)	0.00019
		N <sub>2</sub> O (5)	0.00002
		CO <sub>2</sub> e	9.99
FW-PUMP2	Diesel Fire Water Pump	CO <sub>2</sub> (5)	9.98
		CH <sub>4</sub> (5)	0.00019
		N <sub>2</sub> O (5)	0.00002
		CO <sub>2</sub> e	9.99
FW-PUMP3	Diesel Fire Water Pump	CO <sub>2</sub> (5)	9.98
		CH <sub>4</sub> (5)	0.00019
		N <sub>2</sub> O (5)	0.00002
		CO <sub>2</sub> e	9.99
EG-1	Diesel Emergency Generator 1	CO <sub>2</sub> (5)	59.87
		CH <sub>4</sub> (5)	0.00113
		N <sub>2</sub> O (5)	0.00011
		CO <sub>2</sub> e	59.93
EG-2	Diesel Emergency Generator 2	CO <sub>2</sub> (5)	59.87
		CH <sub>4</sub> (5)	0.00113
		N <sub>2</sub> O (5)	0.00011
		CO <sub>2</sub> e	59.93

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates
			TPY (4)
FL-1	Front End Flare 1 - Pilot	CO <sub>2</sub> (5)	885.72
		CH <sub>4</sub> (5)	0.02
		N <sub>2</sub> O (5)	0.00167
		CO <sub>2</sub> e	886.63
FL-1	Front End Flare 1 - SU/SD	CO <sub>2</sub> (5)	7,119.07
		CH <sub>4</sub> (5)	0.27
		N <sub>2</sub> O (5)	0.07
		CO <sub>2</sub> e	7,147.90
FL-1	Front End Flare 1 (Pilot + SU/SD)	CO <sub>2</sub> (5)	8,004.79
		CH <sub>4</sub> (5)	0.29
		N <sub>2</sub> O (5)	0.07
		CO <sub>2</sub> e	8,034.53
FL-2	Back End Flare 1 - Pilot	CO <sub>2</sub> (5)	885.72
		CH <sub>4</sub> (5)	0.02
		N <sub>2</sub> O (5)	0.00167
		CO <sub>2</sub> e	886.63
FL-2	Back End Flare 1 - SU/SD	CO <sub>2</sub> (5)	32.31
		CH <sub>4</sub> (5)	0.00164
		N <sub>2</sub> O (5)	0.00033
		CO <sub>2</sub> e	32.40
FL-2	Back End Flare 1 (Pilot + SU/SD)	CO <sub>2</sub> (5)	918.03
		CH <sub>4</sub> (5)	0.02
		N <sub>2</sub> O (5)	0.002
		CO <sub>2</sub> e	919.03
FL-3	Storage Flare - Pilot	CO <sub>2</sub> (5)	664.29
		CH <sub>4</sub> (5)	0.01
		N <sub>2</sub> O (5)	0.00125
		CO <sub>2</sub> e	664.97
FL-4	Front End Flare 2 - Pilot	CO <sub>2</sub> (5)	885.72
		CH <sub>4</sub> (5)	0.02

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates
			TPY (4)
		N <sub>2</sub> O (5)	0.00167
		CO <sub>2</sub> e	886.63
FL-4	Front End Flare 2 - SU/SD	CO <sub>2</sub> (5)	7,119.07
		CH <sub>4</sub> (5)	0.27
		N <sub>2</sub> O (5)	0.07
		CO <sub>2</sub> e	7,147.90
FL-4	Front End Flare 2 (Pilot + SU/SD)	CO <sub>2</sub> (5)	8,004.79
		CH <sub>4</sub> (5)	0.29
		N <sub>2</sub> O (5)	0.07
		CO <sub>2</sub> e	8,034.53
FL-5	Back End Flare 2 - Pilot	CO <sub>2</sub> (5)	885.72
		CH <sub>4</sub> (5)	0.02
		N <sub>2</sub> O (5)	0.00167
		CO <sub>2</sub> e	886.63
FL-5	Back End Flare 2 - SU/SD	CO <sub>2</sub> (5)	32.31
		CH <sub>4</sub> (5)	0.00164
		N <sub>2</sub> O (5)	0.00033
		CO <sub>2</sub> e	32.40
FL-5	Back End Flare 2 (Pilot + SU/SD)	CO <sub>2</sub> (5)	918.03
		CH <sub>4</sub> (5)	0.02
		N <sub>2</sub> O (5)	0.002
		CO <sub>2</sub> e	919.03
VTCO2-1	Low Flow CO <sub>2</sub> Vent 1	CO <sub>2</sub> (5)	13,003.35
		CH <sub>4</sub> (5)	0.19
		CO <sub>2</sub> e	13,007.98
VTCO2-2	High Flow CO <sub>2</sub> Vent 1 (Provisional)	CO <sub>2</sub> (5)	1,282,029.03
		CH <sub>4</sub> (5)	18.27
		CO <sub>2</sub> e	1,282,485.81
VTCO2-2	High Flow CO <sub>2</sub> Vent 1	CO <sub>2</sub> (5)	643,388.64
		CH <sub>4</sub> (5)	9.17



Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates
			TPY (4)
		CO <sub>2</sub> e	643,617.88
VTCO2-3	Low Flow CO2 Vent 2	CO <sub>2</sub> (5)	13,003.35
		CH <sub>4</sub> (5)	0.19
		CO <sub>2</sub> e	13,007.98
VTCO2-4	High Flow CO2 Vent 2 (Provisional)	CO <sub>2</sub> (5)	1,282,029.03
		CH <sub>4</sub> (5)	18.27
		CO <sub>2</sub> e	1,282,485.81
VTCO2-4	High Flow CO2 Vent 2	CO <sub>2</sub> (5)	643,388.64
		CH <sub>4</sub> (5)	9.17
		CO <sub>2</sub> e	643,617.88
FUG	Equipment Leak Fugitives	CO <sub>2</sub> (5)	13.26
		CH <sub>4</sub> (5)	16.56
		CO <sub>2</sub> e	427.28

- (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) CO<sub>2</sub> - carbon dioxide  
N<sub>2</sub>O - nitrous oxide  
CH<sub>4</sub> - methane  
HFCs - hydrofluorocarbons  
PFCs - perfluorocarbons  
SF<sub>6</sub> - sulfur hexafluoride  
CO<sub>2</sub>e - carbon dioxide equivalents based on the following Global Warming Potentials (1/2015):  
CO<sub>2</sub> (1), N<sub>2</sub>O (298), CH<sub>4</sub> (25), SF<sub>6</sub> (22,800), HFC (various), PFC (various)
- (4) Compliance with annual emission limits (tons per year) is based on a 12-month rolling period. These rates include emissions from maintenance, startup, and shutdown.
- (5) Emission rate is given for informational purposes only and does not constitute enforceable limit.

Date: TBD

# TCEQ Interoffice Memorandum

## Preliminary Determination Summary

Ingleside Clean Ammonia Partners, LLC  
Permit Numbers 174275, PSDTX1628, and GHGPSDTX234

### I. Applicant

Ingleside Clean Ammonia Partners LLC  
915 North Eldridge Parkway, Suite 1100  
Houston, TX 77079-2703

### II. Project Location

Blue Ammonia Production Trains 1 and 2  
1450 Lexington Boulevard  
San Patricio County  
Ingleside, Texas 78362

### III. Project Description

Ingleside Clean Ammonia Partners, LLC (ICAP) proposes to construct the Ingleside Blue Ammonia (IBA) plant in Ingleside, San Patricio County. The IBA plant will be a blue ammonia production and storage operation, which will be comprised of two production trains with shared utilities, storage, and support systems. Maintenance, startup, and shutdown (MSS) emissions will be authorized under this permit.

### IV. Emissions

Air Contaminant	Proposed Allowable Emission Rates (tpy)
VOC	33.54
NO <sub>x</sub>	90.13
SO <sub>2</sub>	3.86
CO	323.47
PM	183.71
PM <sub>10</sub>	13.09
PM <sub>2.5</sub>	12.39
H <sub>2</sub> S	0.87
NH <sub>3</sub>	66.30
CO <sub>2</sub>	3,373,927.55
CH <sub>4</sub>	68.53
N <sub>2</sub> O	1.59
CO <sub>2</sub> Equivalents (CO <sub>2e</sub> )	3,376,116.96

CO<sub>2e</sub> - carbon dioxide equivalents based on global warming potentials of  
CH<sub>4</sub> = 25, N<sub>2</sub>O = 298, SF<sub>6</sub>=22,800.

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## V. Federal Applicability

The petrochemical complex is located in Jefferson County, which is classified as attainment for all criteria pollutants. The petrochemical complex is a named source, and has a potential to emit (PTE) in excess of 100 tpy for at least one pollutant. PSD review applies to the following pollutants for which the PTE exceeds an applicable significance threshold (40 CFR § 52.21(b)(23)(i)): VOC, NO<sub>x</sub>, CO, PM, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, and H<sub>2</sub>SO<sub>4</sub>. The PTE for H<sub>2</sub>S is less than the applicable significance thresholds, and PSD requirements do not apply for these pollutants. Finally, the petrochemical complex has a PTE in excess of 100 tpy (mass basis) and 75,000 tpy GHG (CO<sub>2e</sub> basis) for GHG. GHG are therefore subject to regulation (40 CFR § 52.21(b)(49)(iv)) and PSD BACT requirements apply to GHG.

The petrochemical complex is located in Jefferson County, which is classified as attainment for all criteria pollutants. Nonattainment review is not applicable.

## VI. Control Technology Review

Control technology is consistent with PSD BACT for PSD pollutants (VOC, NO<sub>x</sub>, CO, PM, PM<sub>10</sub>, PM<sub>2.5</sub>, and GHG) and state minor NSR BACT for SO<sub>2</sub> and H<sub>2</sub>S. A control technology review was conducted for all pollutants. The controls described in this section were determined to satisfy BACT requirements based on a review of recently issued permits from Texas and other states, and consideration of the RACT/BACT/LAER Clearinghouse (RBLC) data provided by the applicant. A more detailed description of the control technology review is included in the permit file.

### Boiler (EPN BLR-AUX1)

The auxiliary boiler will provide steam for use throughout the plant. The boiler will be fired with natural gas and/or hydrogen has a maximum design heat input of 188 MMBtu/hr. Emissions of NO<sub>x</sub> are minimized through the use of ultra-low NO<sub>x</sub> burners. The permit limits NO<sub>x</sub> emissions to 0.010 lb/MMBtu fuel fired (HHV basis) on a 1-hr average. Emissions of CO are limited to 50 ppmvd (3% O<sub>2</sub> basis) on a 1-hr average. Emissions of PM and VOC are limited through good combustion practices and the use of gaseous fuel. GHGs from the boiler will be limited through use of low carbon fuels and good combustion practices.

### Process Heaters (EPNs H-201 and H203)

The fired process heaters and steam superheaters will be fired with natural gas and/or process gas. Fired Process Heaters H-201 and H-203 will have a maximum design heat input of 293 MMBtu/hr. Steam superheaters H-203 and H-204 will have a maximum design heat input of 434 MMBtu/hr. Emissions of NO<sub>x</sub> are minimized through the use of low NO<sub>x</sub> burners and SCR. The permit limits NO<sub>x</sub> emissions to 0.010 lb/MMBtu fuel fired (HHV basis) on a 1-hr average. Emissions of CO are limited to 50 ppmvd (3% O<sub>2</sub> basis) on a 1-hr average. Emissions of PM and VOC are limited through good combustion practices and the use of gaseous fuel. GHGs from the heaters will be limited through use of low carbon fuels and good combustion practices.

### Startup Heaters (EPNs H-590 and H-591)

The startup heaters will be fired with pipeline quality natural gas and will have a maximum design heat input of 116 MMBtu/hr. Each heater will be limited to 48 hours of operation each year. Emissions of NO<sub>x</sub> are minimized through the use of ultra-low NO<sub>x</sub> burners. The permit limits NO<sub>x</sub> emissions to 0.010 lb/MMBtu fuel fired (HHV basis) on a 1-hr average. Emissions of CO are limited to 50 ppmvd (3% O<sub>2</sub> basis) on a 1-hr average. A CEMS is not required due to the limited number of operational hours. Emissions of PM and VOC are limited through good combustion practices and the use of gaseous fuel. GHGs from the boiler will be limited through use of low carbon fuels and good combustion practices.

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## Fire Water Pump (EPNs FW-PUMP1, FW-PUMP2, and FW-PUMP3)

The emergency firewater pumps must satisfy EPA Tier 3 (40 CFR § 1039) requirements. The engines will fire ultra-low sulfur diesel fuel, consisting of no more than 15 ppm sulfur by weight. The engines are limited to 100 hours per year of non-emergency operation and must have a non-resettable runtime meter. GHGs from the emergency engines will be limited through engine design and certification in accordance with CFR standards, and limited operational hours.

## Emergency Generators (EPNs EG-1 and EG-2)

The emergency generators are limited to those satisfying EPA Tier 2 (40 CFR § 1039) requirements. The engines will fire ultra-low sulfur diesel fuel, consisting of no more than 15 ppm sulfur by weight. The engines are each limited to 100 hours per year of non-emergency operation and must have a non-resettable runtime meter. GHGs from the emergency engines will be limited through engine design and certification in accordance with CFR standards, and limited operational hours.

## Cooling Towers (EPNs CTWR1 and CTWR2)

Process-to-water heat exchangers can generate emissions of VOC due to leaks in the heat exchanger, which are emitted at the cooling tower. The cooling towers are non-contact design. The permit requires weekly sampling of cooling water for ammonia. VOC is not present in the heat exchange system and not expected to be emitted. Corrective action must be taken if total strippable hydrocarbon content of the cooling water exceeds 0.08 ppmw equivalent, and delay of repair procedures cannot be used if the strippable hydrocarbon content exceeds 0.8 ppmw. Dissolved solids in the cooling water may also result in particulate emissions at the cooling towers. The permit requires that particulate emissions be minimized through the drift eliminators which are designed to limit total liquid drift to no greater than 0.0005%. Drift eliminators must be inspected regularly and must be repaired or replaced when defects are discovered.

## Flares (EPNs FL-1 and FL-4)

The front-end flares (EPNs FL-1 and FL-4) control the front-end hydrogen production and carbon capture areas of each process train. The permit requires continuous monitoring for waste gas volumetric flow, waste gas Btu content, presence of pilot flame, and visible emissions for the elevated flare. The flare must achieve a minimum destruction/removal efficiency (DRE) of 99% for hydrocarbons containing three carbon atoms or less and ammonia, and 98% for all other compounds. This is to be achieved through compliance with operating requirements at 40 CFR § 60.18. GHGs from the flares will be limited through use of low carbon fuels and good combustion practices.

## Flares (EPNs FL-2 and FL-5)

The back-end flares (EPNs FL-2 and FL-5) control the back-end ammonia synthesis area of each process train. The permit requires continuous monitoring for waste gas volumetric flow, waste gas Btu content, presence of pilot flame, and visible emissions for the elevated flare. The flare must achieve a minimum destruction/removal efficiency (DRE) of 99% for hydrocarbons containing three carbon atoms or less and ammonia, and 98% for all other compounds. This is to be achieved through compliance with operating requirements at 40 CFR § 60.18. SO<sub>2</sub> emissions are limited through use of low-sulfur fuel gas. The permit limits total sulfur in natural gas and plant fuel gas to 2 gr/100dscf. GHGs from the flares will be limited through use of low carbon fuels and good combustion practices.

## Flare (EPN FL-3)

The common flare (EPN FL-3) controls ammonia storage. The permit requires continuous monitoring for waste gas volumetric flow, waste gas Btu content, presence of pilot flame, and visible emissions for the elevated flare. The flare must achieve a minimum destruction/removal efficiency (DRE) of 99% for hydrocarbons containing three carbon atoms or less and ammonia, and 98% for all other compounds. This is to be achieved through compliance with operating requirements at 40 CFR § 60.18. GHGs from the flares will be limited through use of low carbon fuels and good combustion practices.

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## Diesel Storage Tank (EPNs TK-1 and TK-2)

TK-1 and TK-2 are fixed roof tank that will store diesel, which has a true vapor pressure of less than 0.5 psia. The tank is a fixed roof tank that will be painted white and equipped with submerge fill mechanism.

## MDEA Storage Tanks (EPNs TK-3A, TK-3B, TK-4A, TK-4B, TK-5A, and 5B)

The MDEA storage tanks are fixed roof tank that will store diesel, which has a true vapor pressure of less than 0.5 psia. The tank is a fixed roof tank that will be painted white and equipped with submerge fill mechanism.

## Wastewater Treatment (TK-WW1, TK-WW2, TK-WW3, and TK-SW1)

The uncontrolled wastewater emissions are less than 5 tpy. Wastewater will be directed to a covered collection and conveyance system, and hard-piped. Treatment will be performed inside fixed roof storage tanks and released to the outfall. The tanks will hold process wastewater or contact stormwater. The wastewater has a true vapor pressure of greater than 0.5 psia and will be stored in tanks less than 25,000 gallons. The tanks will be painted white and equipped with submerge fill mechanism.

## CO<sub>2</sub> Vent 1 and CO<sub>2</sub> Vent 2 (EPNs VTCO2-1, VTCO2-2, VTCO2-3, and VTCO2-4)

The concentration of CO in the vents is 25 ppm. No additional control is feasible given the low concentration of combustible material in the stream. GHGs are limited through a work practice of good operational practices to minimize the CO<sub>2</sub> emissions.

## Equipment Leak Fugitives (EPN FUG)

Fugitive emissions from piping components in VOC service will be monitored using the TCEQ 28VHP and 28CNTQ leak detection and repair (LDAR) programs. These LDAR programs require quarterly inspection of accessible valves, and pump, compressor and agitator seals in vapor and light liquid service using a portable hydrocarbon analyzer, with a leak definition of 500 ppmv VOC for valves, and 2000 ppmv VOC for pump, compressor and agitator seals. Flanges and other connectors must be monitored quarterly with a portable hydrocarbon analyzer, with a leak definition of 500 ppmv VOC. A first attempt must be made to repair leaks with 5 days, and repairs must be completed within 15 days. GHGs from equipment leak fugitives will be limited through compliance with the LDAR monitoring program.

## MSS activities

The permit specifies control requirements for vessel maintenance and cleaning activities. Process vessels must be degassed to an appropriate control device until the measured VOC concentration in the process vessel is verified to be less than 10,000 ppmv VOC. Process vessels containing no more than 50 lb VOC for which a connection to a control device is not available may be opened to the atmosphere without any prior control.

Degassing of process vessels may use the plant flare system or a temporary control device. Temporary control devices must meet the operational requirements specified in the permit.

A storage tank may not be opened to the atmosphere unless the tank has been degassed to control, and the residual VOC concentration in the tank is reduced to 5,000 ppmv or less. Once a tank is opened, measures must be taken to minimize emissions until all standing liquid is removed from the tank. For floating roof storage tanks storing liquids with a VOC vapor pressure of 0.5 psia or greater, the tank vapor space must be collected to a functioning closed vent system and control device any time the floating roof is landed on its supporting legs, except that control requirements are waived for up to 24 hours following emptying of the tank for inspection and maintenance.

Vacuum trucks must be equipped with a "duck bill" hose tip in order to minimize air entrainment into the truck's storage tank. The exhaust of the vacuum truck must be directed to a control device if the liquid being collected has a VOC vapor pressure in excess of 0.5 psia.

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## VII. Air Quality Analysis

The air quality analysis (AQA) is acceptable for all review types and pollutants. The results are summarized below.

### A. De Minimis Analysis

A De Minimis analysis was initially conducted to determine if a full impacts analysis would be required. The De Minimis analysis modeling results indicate that 24-hr and annual PM<sub>2.5</sub> (NAAQS and Increment) and 1-hr and annual NO<sub>2</sub> exceed the respective de minimis concentrations and require a full impacts analysis. The De Minimis analysis modeling results for 1-hr and 8-hr CO indicate that the project is below the respective de minimis concentrations and no further analysis is required.

The justification for selecting EPA's interim 1-hr NO<sub>2</sub> De Minimis level is based on the assumptions underlying EPA's development of the 1-hr NO<sub>2</sub> De Minimis level. As explained in EPA guidance memoranda<sup>1</sup>, EPA believes it is reasonable as an interim approach to use a De Minimis level that represents 4% of the 1-hr NO<sub>2</sub> NAAQS.

The PM<sub>2.5</sub> De Minimis levels are EPA recommended De Minimis levels. The use of EPA recommended De Minimis levels is sufficient to conclude that a proposed source will not cause or contribute to a violation of a PM<sub>2.5</sub> NAAQS or PM<sub>2.5</sub> PSD increments based on the analyses documented in EPA guidance and policy memoranda<sup>2</sup>.

While the De Minimis levels for both the NAAQS and increment are identical for PM<sub>2.5</sub> in the table below, the procedures to determine significance (that is, predicted concentrations to compare to the De Minimis levels) are different. This difference occurs because the NAAQS for PM<sub>2.5</sub> are statistically-based, but the corresponding increments are exceedance-based.

**Table 1. Modeling Results for PSD De Minimis Analysis in Micrograms Per Cubic Meter ( $\mu\text{g}/\text{m}^3$ )**

Pollutant	Averaging Time	GLCmax ( $\mu\text{g}/\text{m}^3$ )	De Minimis ( $\mu\text{g}/\text{m}^3$ )
PM <sub>2.5</sub> (NAAQS)	24-hr	4.1	1.2
PM <sub>2.5</sub> (NAAQS)	Annual	0.37	0.13
PM <sub>2.5</sub> (Increment)	24-hr	4.6	1.2
PM <sub>2.5</sub> (Increment)	Annual	0.39	0.13
NO <sub>2</sub>	1-hr	16	7.5
NO <sub>2</sub>	Annual	3	1
CO	1-hr	1237	2000

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<sup>1</sup> [www.tceq.texas.gov/assets/public/permitting/air/memos/guidance\\_1hr\\_no2naaqs.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/memos/guidance_1hr_no2naaqs.pdf)

<sup>2</sup> [www.tceq.texas.gov/permitting/air/modeling/epa-mod-guidance.html](http://www.tceq.texas.gov/permitting/air/modeling/epa-mod-guidance.html)

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Pollutant	Averaging Time	GLCmax ( $\mu\text{g}/\text{m}^3$ )	De Minimis ( $\mu\text{g}/\text{m}^3$ )
CO	8-hr	222	500

The 24-hr and annual  $\text{PM}_{2.5}$  (NAAQS) and 1-hr  $\text{NO}_2$  GLCmax are based on the highest five-year averages of the maximum predicted concentrations determined for each receptor. The GLCmax for all other pollutants and averaging times represent the maximum predicted concentrations over five years of meteorological data.

EPA intermittent guidance was relied on for the 1-hr  $\text{NO}_2$  PSD De Minimis analysis. Refer to the Modeling Emissions Inventory section for details.

To evaluate secondary  $\text{PM}_{2.5}$  impacts, the applicant provided an analysis based on a Tier 1 demonstration approach consistent with EPA's Guideline on Air Quality Models (GAQM). Specifically, the applicant used a Tier 1 demonstration tool developed by the EPA referred to as Modeled Emission Rates for Precursors (MERPs). The basic idea behind MERPs is to use technically credible air quality modeling to relate precursor emissions and peak secondary pollutants impacts from a source. Using data associated with the worst-case hypothetical source, the applicant estimated 24-hr and annual secondary  $\text{PM}_{2.5}$  concentrations of  $0.05 \mu\text{g}/\text{m}^3$  and  $0.002 \mu\text{g}/\text{m}^3$ , respectively. Since the combined direct and secondary 24-hr and annual  $\text{PM}_{2.5}$  impacts are above the De minimis levels, a full impacts analysis is required.

Since the project does not have a net emission increase of 100 tons per year (tpy) or more of volatile organic compounds or nitrogen oxides, an ambient ozone impacts analysis is not required.

## B. Air Quality Monitoring

The De Minimis analysis modeling results indicate that annual  $\text{NO}_2$  and 8-hr CO are below their respective monitoring significance level.

**Table 2. Modeling Results for PSD Monitoring Significance Levels**

Pollutant	Averaging Time	GLCmax ( $\mu\text{g}/\text{m}^3$ )	Significance ( $\mu\text{g}/\text{m}^3$ )
$\text{NO}_2$	Annual	3	14
CO	8-hr	211	575

The GLCmax for all pollutants and averaging times represent the maximum predicted concentrations over five years of meteorological data.

The applicant evaluated ambient  $\text{PM}_{2.5}$  monitoring data to satisfy the requirements for the pre-application air quality analysis.

Background concentrations for  $\text{PM}_{2.5}$  were obtained from EPA AIRS monitor 483550034 located at 5707 Up River Road, Corpus Christi, Nueces County. The applicant used a three-year average (2021-2023) of the 98<sup>th</sup> percentile of the annual distribution of the 24-hr concentrations for the 24-hr value ( $24 \mu\text{g}/\text{m}^3$ ). The applicant used a three-year average (2021-2023) of the annual mean concentrations for the annual value ( $8.5 \mu\text{g}/\text{m}^3$ ). The use of this monitor is reasonable based on a comparison of county-wide emissions, population, and a quantitative review of emissions sources in the surrounding area of the monitor site relative to the project site. This monitor was also used for the NAAQS analysis.

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## C. National Ambient Air Quality Standards (NAAQS) Analysis

The De Minimis analysis modeling results indicate that 24-hr and annual PM<sub>2.5</sub> and 1-hr and annual NO<sub>2</sub> exceed the respective de minimis concentration and require a full impacts analysis. The full NAAQS modeling results indicate the total predicted concentrations will not result in an exceedance of the NAAQS.

**Table 3. Total Concentrations for PSD NAAQS (Concentrations > De Minimis)**

Pollutant	Averaging Time	GLCmax (µg/m <sup>3</sup> )	Background (µg/m <sup>3</sup> )	Total Conc. = [Background + GLCmax] (µg/m <sup>3</sup> )	Standard (µg/m <sup>3</sup> )
PM <sub>2.5</sub>	24-hr	8	24	32	35
PM <sub>2.5</sub>	Annual	0.38	8.5	8.88	9
NO <sub>2</sub>	1-hr	103	59	162	188
NO <sub>2</sub>	Annual	11	12	23	100

The 24-hr PM<sub>2.5</sub> GLCmax is the highest five-year average of the 98<sup>th</sup> percentile of the annual distribution of predicted 24-hr concentrations determined for each receptor. The annual PM<sub>2.5</sub> GLCmax is the maximum five-year average of the annual concentrations determined for each receptor. The 1-hr NO<sub>2</sub> GLCmax is the high, eighth high concentration over five years of meteorological data. This is conservative. The annual NO<sub>2</sub> GLCmax is the maximum predicted concentration over five years of meteorological data.

EPA intermittent guidance was relied on for the 1-hr NO<sub>2</sub> PSD NAAQS analysis. Refer to the Modeling Emissions Inventory section for details.

Background concentrations for NO<sub>2</sub> were obtained from the EPA AIRS monitor 482450009 located at 1086 Vermont Ave., Beaumont, Jefferson County. The three-year average (2021-2023) of the 98<sup>th</sup> percentile of the annual distribution of the daily maximum 1-hr concentrations was used for the 1-hr value. The annual mean concentration from 2023 was used for the annual value. The use of this monitor is reasonable based on a comparison of county-wide emissions, population, and a quantitative review of emissions sources in the surrounding area of the monitor site relative to the project site.

As stated above, to evaluate secondary PM<sub>2.5</sub> impacts, the applicant provided an analysis based on a Tier 1 demonstration approach consistent with EPA's GAQM. Specifically, the applicant used a Tier 1 demonstration tool developed by EPA referred to as MERPs. Using data associated with the worst-case hypothetical source, the applicant estimated 24-hr and annual secondary PM<sub>2.5</sub> concentrations of 0.05 µg/m<sup>3</sup> and 0.002 µg/m<sup>3</sup>, respectively. When these estimates are added to the GLCmax listed in Table 3 above, the results are less than the NAAQS.

## D. Increment Analysis

The De Minimis analysis modeling results indicate that 24-hr and annual PM<sub>2.5</sub> and annual NO<sub>2</sub> exceed the respective de minimis concentrations and require a PSD increment analysis.



# TCEQ Interoffice Memorandum

**Table 4. Results for PSD Increment Analysis**

Pollutant	Averaging Time	GLCmax ( $\mu\text{g}/\text{m}^3$ )	Increment ( $\mu\text{g}/\text{m}^3$ )
PM <sub>2.5</sub>	24-hr	8.47	9
PM <sub>2.5</sub>	Annual	0.41	4
NO <sub>2</sub>	Annual	11	25

The GLCmax for 24-hr PM<sub>2.5</sub> is the maximum high, second high (H2H) predicted concentration across five years of meteorological data. For annual NO<sub>2</sub> and PM<sub>2.5</sub>, the GLCmax represents the maximum predicted concentrations over five years of meteorological data.

The GLCmax for 24-hr and annual PM<sub>2.5</sub> reported in the table above represent the total predicted concentrations associated with modeling the direct PM<sub>2.5</sub> emissions and the contributions associated with secondary PM<sub>2.5</sub> formation (discussed above in the NAAQS Analysis section).

## E. Additional Impacts Analysis

The applicant performed an Additional Impacts Analysis as part of the PSD AQA. The applicant conducted a growth analysis and determined that population will not significantly increase as a result of the proposed project. The applicant conducted a soils and vegetation analysis and determined that all evaluated criteria pollutant concentrations are below their respective secondary NAAQS. The applicant meets the Class II visibility analysis requirement by complying with the opacity requirements of 30 TAC Chapter 111. The Additional Impacts Analyses are reasonable and possible adverse impacts from this project are not expected.

ADMT evaluated predicted concentrations from the proposed project to determine if emissions could adversely affect a Class I area. The nearest Class I area, Big Bend National Park, is located approximately 500 kilometers (km) from the proposed site.

The predicted concentrations of PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>2</sub>, and SO<sub>2</sub> for all averaging times, are all less than de minimis levels at a distance of 2.3 km from the proposed sources in the direction the Big Bend National Park Class I area. The Big Bend National Park Class I area is an additional 497.7 km from the location where the predicted concentrations of PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>2</sub>, and SO<sub>2</sub> for all averaging times are less than de minimis. Therefore, emissions from the proposed project are not expected to adversely affect the Big Bend National Park Class I area.

## F. Minor Source NSR and Air Toxics Review

**Table 5. Project-Related Modeling Results for State Property Line**

Pollutant	Averaging Time	GLCmax ( $\mu\text{g}/\text{m}^3$ )	De Minimis ( $\mu\text{g}/\text{m}^3$ )
SO <sub>2</sub>	1-hr	1.46	20.42

# TCEQ Interoffice Memorandum

**Table 6. Site-wide Modeling Results for State Property Line**

Pollutant	Averaging Time	GLCmax ( $\mu\text{g}/\text{m}^3$ )	Standard ( $\mu\text{g}/\text{m}^3$ )
H <sub>2</sub> S	1-hr	9.49	108 (If property is residential, recreational, business, or commercial)

**Table 7. Modeling Results for Minor NSR De Minimis**

Pollutant	Averaging Time	GLCmax ( $\mu\text{g}/\text{m}^3$ )	De Minimis ( $\mu\text{g}/\text{m}^3$ )
SO <sub>2</sub>	1-hr	0.8	7.8
SO <sub>2</sub>	3-hr	0.2	25
PM <sub>10</sub>	24-hr	4	5

The GLCmax are the maximum predicted concentrations associated with one year of meteorological data.

EPA intermittent guidance was relied on for the 1-hr SO<sub>2</sub> De Minimis analysis. Refer to the Modeling Emissions Inventory section for details.

The justification for selecting EPA's interim 1-hr SO<sub>2</sub> De Minimis level was based on the assumptions underlying EPA's development of the 1-hr SO<sub>2</sub> De Minimis level. As explained in EPA guidance memoranda<sup>3</sup>, EPA believes it is reasonable as an interim approach to use a De Minimis level that represents 4% of the 1-hr SO<sub>2</sub> NAAQS.

**Table 8. Minor NSR Site-wide Modeling Results for Health Effects**

Pollutant	CAS#	Averaging Time	GLCmax ( $\mu\text{g}/\text{m}^3$ )	GLCmax Location	ESL ( $\mu\text{g}/\text{m}^3$ )
diesel engine exhaust	N/A	1-hr	38.19	NE Property Line	19
diesel engine exhaust	N/A	Annual	0.05	W Property Line	0.15
diesel fuel #2	68476-34-6	1-hr	4250	SE Property Line	1000
diesel fuel #2	68476-34-6	Annual	2	W Property Line	100
N-methyldiethanolamine	105-59-9	1-hr	62	122m E	96
ammonia	7664-41-7	1-hr	454	SE Property Line	180

<sup>3</sup> [www.epa.gov/sites/production/files/2015-07/documents/appwso2.pdf](http://www.epa.gov/sites/production/files/2015-07/documents/appwso2.pdf)  
Texas Commission on Environmental Quality

# TCEQ Interoffice Memorandum

Pollutant	CAS#	Averaging Time	GLCmax ( $\mu\text{g}/\text{m}^3$ )	GLCmax Location	ESL ( $\mu\text{g}/\text{m}^3$ )
ammonia	7664-41-7	Annual	2	SE Property Line	92
methanol	67-56-1	1-hr	2	40m W	3900
hydrogen cyanide	74-90-8	1-hr	0.002	1km N	20
n-butane	106-97-8	1-hr	576	NE Property Line	66000

**Table 9. Minor NSR Hours of Exceedance for Health Effects**

Pollutant	Averaging Time	1 X ESL GLCni	2 X ESL GLCmax	4 X ESL GLCmax
diesel engine exhaust	1-hr	20	1	0
diesel fuel #2	1-hr	38	10	1
ammonia	1-hr	16	2	0

The GLCmax locations are listed in Table 8 above. The locations are listed by their approximate distance and direction from the property line of the project site. Please note that the applicant evaluated the GLCmax as the GLCni.

## G. Greenhouse Gases

EPA has stated that unlike the criteria pollutants for which EPA has historically issued PSD permits, there is no National Ambient Air Quality Standard (NAAQS) for GHGs, including no PSD increment. The global climate-change inducing effects of GHG emissions, according to the “Endangerment and Cause or Contribute Finding”, are far-reaching and multi-dimensional (75 FR 66497). Climate change modeling and evaluations of risks and impacts are typically conducted for changes in emissions that are orders of magnitude larger than the emissions from individual projects that might be analyzed in PSD permit reviews. Quantifying the exact impacts attributable to a specific GHG source obtaining a permit in specific places and points would not be possible [EPA’s PSD and Title V Permitting Guidance for GHGs at 48]. Thus, EPA has concluded in other GHG PSD permitting actions it would not be meaningful to evaluate impacts of GHG emissions on a local community in the context of a single permit.

The TCEQ has determined that an air quality analysis would provide no meaningful data and has not required the applicant to perform one. As stated in the preamble to TCEQ’s adoption of the GHG PSD program, the impacts review for individual air contaminants will continue to be addressed, as applicable, in the state’s traditional minor and major NSR permits program per 30 TAC Chapter 116.

## VIII. Conclusion

As described above, the applicant has demonstrated that the project meets all applicable rules, regulations and requirements of the Texas and Federal Clean Air Acts. The Executive Director’s preliminary determination is that the permits should be issued.

# COMISIÓN DE CALIDAD AMBIENTAL DE TEXAS



## EJEMPLO A

### ANUNCIO DE SOLICITUD Y DECISIÓN PRELIMINAR PARA PERMISOS DE CALIDAD DEL AIRE

#### NÚMEROS DE PERMISOS DE CALIDAD DEL AIRE PROPUESTOS 174275, PSDTX1628 Y GHGPSDTX234

**SOLICITUD Y DECISIÓN PRELIMINAR.** Ingleside Clean Ammonia Partners, LLC, 915 North Eldridge Parkway Suite 1100, Houston, Texas 77079-2703, ha solicitado a la Comisión de Calidad Ambiental de Texas (TCEQ) la emisión de la propuesta de 174275 de Permiso Estatal de Calidad del Aire, la emisión del Permiso de Calidad del Aire para la Prevención del Deterioro Significativo (PSD) PSDTX1628 y la emisión del Permiso de Calidad del Aire PSD de Gases de Efecto Invernadero (GEI) GHGPSDTX234 para las emisiones de GEI, que autorizaría la construcción de los Trenes de Producción de Amoníaco Azul 1 y 2 ubicados en 1450 Lexington Boulevard, Ingleside, Condado de San Patricio, Texas 78362. Esta solicitud se procesó de manera expedita, según lo permitido por las reglas de la comisión en el Código Administrativo de Texas 30, Capítulo 101, Subcapítulo J. **AVISO DE IDIOMA ALTERNATIVO.** El aviso de idioma alternativo en español está disponible en <https://www.tceq.texas.gov/permitting/air/newsourcereview/airpermits-pendingpermit-apps>.

La instalación propuesta emitirá los siguientes contaminantes atmosféricos en una cantidad significativa: monóxido de carbono, óxidos de nitrógeno y material particulado, incluido el material particulado con diámetros de 2.5 micras o menos. Además, la instalación emitirá los siguientes contaminantes atmosféricos: contaminantes atmosféricos peligrosos, compuestos orgánicos, dióxido de azufre, material particulado, incluido el material particulado con diámetros de 10 micras o menos, amoníaco y sulfuro de hidrógeno.

El grado de incremento de la DSP que se prevé que consuman la instalación propuesta y otras fuentes consumidoras de incrementos-en la zona es el siguiente:

Dióxido de nitrógeno

Máximo Promedio Hora	Máximo Incremento Consumido ( $\mu\text{g}/\text{m}^3$ )	Permissible Incremento ( $\mu\text{g}/\text{m}^3$ )
Anual	11	25

PM<sub>2.5</sub>

Máximo Promedio Hora	Máximo Incremento Consumido ( $\mu\text{g}/\text{m}^3$ )	Permissible Incremento ( $\mu\text{g}/\text{m}^3$ )
24 horas	8.47	9
Anual	0.41	4

Esta solicitud se presentó a la TCEQ el 12 de octubre de 2023. El director ejecutivo ha determinado que las emisiones de contaminantes atmosféricos de la instalación propuesta que están sujetas a revisión de la PSD no violarán ninguna regulación estatal o federal de calidad del aire y no tendrán ningún impacto adverso significativo en los suelos, la vegetación o la visibilidad. Todos los contaminantes del aire han sido evaluados y se utilizará la "mejor tecnología de control disponible" para el control de estos contaminantes.

El director ejecutivo ha completado el examen técnico de la solicitud y ha preparado un proyecto de permiso que, de ser aprobado, establecería las condiciones en las que debe funcionar la instalación. La solicitud de permiso, la decisión

preliminar del director ejecutivo, el borrador del permiso y el resumen de la determinación preliminar del director ejecutivo y el análisis de la calidad del aire del director ejecutivo estarán disponibles para su visualización y copia en la oficina central de TCEQ, la oficina regional de TCEQ Corpus Christi y en la Biblioteca Pública de Sinton, 1000 North Pirate Boulevard, Sinton, Condado de San Patricio, Texas, a partir del primer día de publicación de este aviso. El expediente de cumplimiento de la instalación, si existe, está disponible para revisión pública en la Oficina Regional de TCEQ Corpus Christi, 500 North Shoreline Boulevard, Suite 500, Corpus Christi, Texas.

**INFORMACIÓN DISPONIBLE EN LÍNEA.** Estos documentos son accesibles a través del sitio web de la Comisión en [www.tceq.texas.gov/goto/cid](http://www.tceq.texas.gov/goto/cid): la decisión preliminar del director ejecutivo que incluye el borrador del permiso, el resumen de la determinación preliminar del director ejecutivo, el análisis de la calidad del aire y, una vez disponible, la respuesta del director ejecutivo a los comentarios y la decisión final sobre esta solicitud. Acceda a la Base de Datos Integrada de los Comisionados (CID) utilizando el enlace anterior e ingrese el número de permiso para esta solicitud. La ubicación pública mencionada anteriormente proporciona acceso público a internet. Este enlace a un mapa electrónico de la ubicación general del sitio o instalación se proporciona como una cortesía pública y no forma parte de la solicitud o aviso. Para conocer la ubicación exacta, consulte la aplicación. <https://gisweb.tceq.texas.gov/LocationMapper/?marker=-97.205227,27.824941&level=13>

**COMENTARIO PÚBLICO/REUNIÓN PÚBLICA.** Puede enviar comentarios públicos o solicitar una reunión pública a la Oficina del secretario Principal a la dirección que se indica a continuación. El propósito de una reunión pública es brindar la oportunidad de enviar comentarios o hacer preguntas sobre la solicitud. La TCEQ llevará a cabo una reunión pública si el director ejecutivo determina que existe un grado significativo de interés público en la solicitud, si lo solicita una persona interesada o si lo solicita un legislador local. Una reunión pública no es una audiencia de caso impugnado. **Puede presentar comentarios públicos adicionales por escrito dentro de los 30 días posteriores a la fecha de publicación de este aviso en el periódico de la manera establecida en el párrafo CONTACTOS E INFORMACIÓN DE LA AGENCIA a continuación.**

Después de la fecha límite para los comentarios públicos, el director ejecutivo considerará los comentarios y preparará una respuesta a todos los comentarios públicos relevantes y materiales o significativos. **La respuesta a los comentarios, junto con la decisión del director ejecutivo sobre la solicitud, se enviará por correo a todos los que presentaron comentarios públicos o están en una lista de correo para esta solicitud. El correo también proporcionará instrucciones para solicitar una audiencia de caso impugnado o la reconsideración de la decisión del director ejecutivo.**

**OPORTUNIDAD PARA UNA AUDIENCIA DE CASO IMPUGNADO.** Usted puede solicitar una audiencia de caso impugnado con respecto a las partes de la solicitud para el Permiso Estatal de Calidad del Aire Número 174275 y para el Permiso de Calidad del Aire PSD Número PSDTX1628. No hay oportunidad de solicitar una audiencia de caso impugnado con respecto a la parte de la solicitud para el Permiso de Calidad del Aire Número GHGSPDXTX234 de GHG PSD. Una audiencia de caso impugnado es un procedimiento legal similar a un juicio civil en un tribunal de distrito estatal. Una persona que pueda verse afectada por las emisiones de contaminantes atmosféricos, distintos de los GEI, de la instalación tiene derecho a solicitar una audiencia. Una solicitud de audiencia de caso impugnado debe incluir lo siguiente: (1) su nombre (o para un grupo o asociación, un representante oficial), dirección postal, número de teléfono durante el día; (2) nombre del solicitante y número de permiso; (3) la declaración "Solicito/solicitamos una audiencia de caso impugnado"; (4) una descripción específica de cómo se vería afectado negativamente por la aplicación y las emisiones atmosféricas de la instalación de una manera que no es común para el público en general; (5) la ubicación y distancia de su propiedad en relación con la instalación; (6) una descripción de cómo utiliza la propiedad que puede verse afectada por la instalación; y (7) una lista de todas las cuestiones de hecho en disputa que envíe durante el período de comentarios. Si la solicitud es hecha por un grupo o asociación, uno o más miembros que tengan capacidad para solicitar una audiencia deben ser identificados por nombre y dirección física. También se deben identificar los intereses que el grupo o asociación busca proteger. También puede presentar sus ajustes propuestos a la solicitud/permiso que satisfagan sus inquietudes. Las solicitudes para una audiencia de caso impugnado deben presentarse por escrito dentro de los 30 días posteriores a este aviso a la Oficina del secretario Principal, a la dirección proporcionada en la sección de información a continuación.

Solo se concederá una audiencia de caso impugnado sobre la base de cuestiones de hecho controvertidas o cuestiones mixtas de hecho y de derecho que sean relevantes y materiales para las decisiones de la Comisión sobre la solicitud. La Comisión solo puede conceder una solicitud de audiencia de caso impugnado sobre cuestiones que el solicitante

presentó en sus comentarios oportunos que no fueron retirados posteriormente. Los asuntos que no se presenten en los comentarios públicos no se pueden considerar durante una audiencia.

**ACCIÓN DEL DIRECTOR EJECUTIVO.** El director ejecutivo puede emitir la aprobación final de la solicitud para la parte de la solicitud para el Permiso de Calidad del Aire GHG PSD GHGPSDTX234. Si no se recibe una solicitud de audiencia de caso impugnado a tiempo o si se retiran todas las solicitudes de audiencia de caso impugnado oportunamente con respecto al Permiso Estatal de Calidad del Aire Número 174275 y para el Permiso de Calidad del Aire Número PSDTX1628 del PSD, el director ejecutivo puede emitir la aprobación final de la solicitud. La respuesta a los comentarios, junto con la decisión del director ejecutivo sobre la solicitud, se enviará por correo a todos los que presentaron comentarios públicos o están en una lista de correo para esta solicitud, y se publicarán electrónicamente al CID. Si se reciben solicitudes de audiencia oportunas y no se retiran, el director ejecutivo no emitirá la aprobación final del Permiso Estatal de Calidad del Aire Número 174275 y del Permiso de Calidad del Aire Número PSD TX1628 del PSD y enviará la solicitud y las solicitudes a los Comisionados para su consideración en una reunión programada de la comisión.

**LISTA DE CORREO.** Usted puede solicitar que lo incluyan en una lista de correo para obtener información adicional sobre esta solicitud enviando una solicitud a la Oficina del secretario Principal a la dirección que se indica a continuación.

**CONTACTOS E INFORMACIÓN DE LA AGENCIA.** Los comentarios públicos y las solicitudes deben presentarse electrónicamente en [www14.tceq.texas.gov/epic/eComment/](http://www14.tceq.texas.gov/epic/eComment/) o por escrito a la Comisión de Calidad Ambiental de Texas, Oficina del secretario Principal, MC-105, P.O. Box 13087, Austin, Texas 78711-3087. Tenga en cuenta que cualquier información de contacto que proporcione, incluido su nombre, número de teléfono, dirección de correo electrónico y dirección física, pasará a formar parte del registro público de la agencia. Para obtener más información sobre esta solicitud de permiso o el proceso de permisos, llame al número gratuito del Programa de Educación Pública al 1-800-687-4040. Si desea información en español, puede llamar al 1-800-687-4040.

También se puede obtener más información de Ingleside Clean Ammonia Partners LLC en la dirección indicada anteriormente o llamando al Sr. Clayton Curtis, director de Asuntos Regulatorios de USGC Terminals, Enbridge, Inc., al (855) 385-6645.

Fecha de emisión del aviso: 26 de agosto de 2024