

INEOS Olefins & Polymers USA

INEOS Olefins & Polymers USA
A Division of INEOS USA LLC
Chocolate Bayou Works
Two Miles South of FM 2917 on FM 2004
P.O. Box 1488
Alvin, Texas 77512
Tel: (281) 581-3201
Fax: (281) 581-3423
www.ineos-op.com

July 7, 2015

CERTIFIED MAIL No.: 7004 1160 0004 0966 4622
RETURN RECEIPT REQUESTED

Ms. Melanie Magee
United States Environmental Protection Agency, Region 6
Compliance and Enforcement Division
1445 Ross Avenue (6EN)
Dallas, TX 75202

RE: INEOS USA LLC - Chocolate Bayou Plant, Alvin, Texas
Permit PSD-TX-97769-GHG, Request for Rescission

Dear Ms. Magee:

EPA Region 6 issued permit PSD-TX-97769-GHG on October 5, 2012, authorizing the construction of a new furnace (Emission Point Number DDB-105). This included two additional emission points comprised of a Decoke Stack (DDF-106) and fugitive components (FUG-ADDF).

The construction of these emissions points required a "Step 2" permit under the Prevention of Significant Deterioration (PSD) rules in place at the time. The modification of the existing INEOS Chocolate Bayou stationary source did not meet any PSD triggers for other pollutants.

Enclosed is a copy of the issued minor New Source Review (NSR) permit from the state of Texas. The TCEQ NSR permit uses the same Emission Point Number designations as the EPA PSD permit. The Maximum Allowable Emission Rates Table shows that emissions of NO₂, CO, SO₂, PM₁₀, and PM_{2.5} are all below the respective PSD triggers.

INEOS is requesting a rescission of permit PSD-TX-97769-GHG in accordance with 40 CFR 52.21(w)(2)(iii), because this permit was a major modification solely on the basis of the greenhouse gas emissions increase.

RECEIVED
15 JUL 29 PM 3: 17
AIR PERMITS SECTION
6PD-R

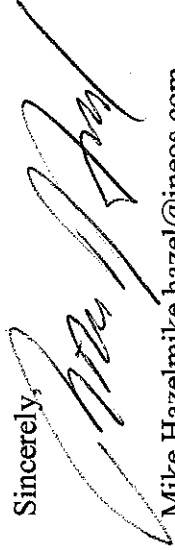
INEOS Olefins & Polymers USA

July 7, 2015
Page 2

I hereby certify that the GHG PSD permit issued by EPA Region 6 is not being used, or planned to be used, for any other regulatory or compliance and enforcement purposes, and the information contained in the rescission submittal is factual and correct.

Please contact Dan Lutz at (713) 737-9300 or Daniel.Lutz@ineos.com if you have any additional questions.

Sincerely,



Mike Hazel mike.hazel@ineos.com

DL/nfs

Enclosure: copy of Texas New Source Review permit 97769



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY AIR QUALITY PERMIT



*A PERMIT IS HEREBY ISSUED TO
INEOS USA LLC
No 2 Olefins Unit
LOCATED AT Alvin, Brazoria County, Texas
LATITUDE 29° 13' 28" LONGITUDE 95° 11' 51"*

1. **Facilities covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code § 116.116 (30 TAC § 116.116)]**
2. **Voiding of Permit. A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of the date of issuance; discontinues construction for more than 18 months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant an 18-month extension. Before the extension is granted the permit may be subject to revision based on best available control technology, lowest achievable emission rate, and netting or offsets as applicable. One additional extension of up to 18 months may be granted if the permit holder demonstrates that emissions from the facility will comply with all rules and regulations of the commission, the intent of the Texas Clean Air Act (TCAA), including protection of the public's health and physical property; and (b)(1) the permit holder is a party to litigation not of the permit holder's initiation regarding the issuance of the permit; or (b)(2) the permit holder has spent, or committed to spend, at least 10 percent of the estimated total cost of the project up to a maximum of \$5 million. A permit holder granted an extension under subsection (b)(1) of this section may receive one subsequent extension if the permit holder meets the conditions of subsection (b)(2) of this section. [30 TAC § 116.120(a), (b) and (c)]**
3. **Construction Progress. Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC § 116.115(b)(2)(A)]**
4. **Start-up Notification. The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify to the Chief Engineer's Office the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 c this title (relating to Mass Emissions Cap and Trade Program).**
5. **Sampling Requirements. If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC § 116.115(b)(2)(C)]**
6. **Equivalency of Methods. The permit holder must demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the permit. [30 TAC § 116.115(b)(2)(D)]**
7. **Recordkeeping. The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and operating hours; keep all required records in a file at the plant site. If, however, the facility normally operates unattended, record shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction; comply with any additional recordkeeping requirements specified in special conditions attached to the permit, and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC § 116.115(b)(2)(E)]**
8. **Maximum Allowable Emission Rates. The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources--Maximum Allowable Emission Rates." [30 TAC § 116.115(b)(2)(F)]**
9. **Maintenance of Emission Control. The permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. The permit holder shall provide notification for upsets and maintenance in accordance with §§ 101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC § 116.115(b)(2)(G)]**
10. **Compliance with Rules. Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules, regulations, and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC § 116.115(b)(2)(H)]**
11. **This permit may be appealed pursuant to 30 TAC § 50.139.**
12. **This permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC § 116.110(e)]**
13. **There may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC § 116.115(e)]**
14. **Emissions from this facility must not cause or contribute to a condition of "air pollution" as defined in TCAA § 382.003(3) or violate TCAA § 382.085, as codified in the Texas Health and Safety Code. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.**

PERMIT 27769

For the Commission

Date: September 26, 2012

Special Conditions

Permit Numbers 97769

Emission and Operational Limitations

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

Fugitive Monitoring

3. Piping, Valves, Connectors, Pumps, Agitators, and Compressors - 28VHP

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

- A. The requirements of paragraphs F and G shall not apply (1) where the Volatile Organic Compound (VOC) has an aggregate partial pressure or vapor pressure of less than 0.044 pounds per square inch, absolute (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:

- (1) piping and instrumentation diagram (PID);
- (2) a written or electronic database or electronic file;
- (3) color coding;
- (4) a form of weatherproof identification; or
- (5) designation of exempted process unit boundaries.

- B. Construction of new and reworked piping, valves, pump systems, and compressor systems shall conform to applicable American National

Standards Institute (ANSI), American Petroleum Institute (API), American Society of Mechanical Engineers (ASME), or equivalent codes.

- C. New and reworked underground process pipelines shall contain no buried valves such that fugitive emission monitoring is rendered impractical. New and reworked buried connectors shall be welded.
- D. To the extent that good engineering practice will permit, new and reworked valves and piping connections shall be so located to be reasonably accessible for leak-checking during plant operation. Difficult-to-monitor and unsafe-to-monitor valves, as defined by Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115), shall be identified in a list to be made readily available upon request. The difficult-to-monitor and unsafe-to-monitor valves may be identified by one or more of the methods described in Subparagraph A above. If an unsafe-to-monitor component is not considered safe to monitor within a calendar year, then it shall be monitored as soon as possible during safe-to-monitor times. A difficult-to-monitor component for which quarterly monitoring is specified may instead be monitored annually.
- E. New and reworked piping connections shall be welded or flanged. Screwed connections are permissible only on piping smaller than two-inch diameter. Gas or hydraulic testing of the new and reworked piping connections at no less than operating pressure shall be performed prior to returning the components to service or they shall be monitored for leaks using an approved gas analyzer within 15 days of the components being returned to service. Adjustments shall be made as necessary to obtain leak-free performance. Connectors shall be inspected by visual, audible, and/or olfactory means at least weekly by operating personnel walk-through.
- Each open-ended valve or line shall be equipped with an appropriately sized cap, blind flange, plug, or a second valve to seal the line. Except during sampling, 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 an automatic seal failure detection and alarm system need not be monitored. These seal systems may include (but are not limited to) dual pump seals with barrier fluid at higher pressure than process pressure, seals degassing to vent control systems kept in good working order, or seals equipped with an automatic seal failure detection and alarm system. Submerged pumps or sealless pumps (including, but not limited to, diaphragm, canned, or magnetic-driven pumps) may be used to satisfy the requirements of this condition and need not be monitored.
- H. Damaged or leaking valves or connectors found to be emitting VOC in excess of 500 parts per million by volume (ppmv) or found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. Damaged or leaking pump, compressor, and agitator seals found to be emitting VOC in excess of 2,000 ppmv or found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. A first attempt to repair the leak must be made within 5 days 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 shutdown as calculated in accordance with 30 TAC 115.782 (c)(1)(B)(i)(I), the TCEQ Regional Manager and any local programs shall be notified and may require early unit shutdown or other appropriate action based on the

number and severity of tagged leaks awaiting shutdown. This notification shall be made within 15 days of making this determination.

- J. Records of repairs shall include date of repairs, repair results, justification for delay of repairs, and corrective actions taken for all components. Records of instrument monitoring shall indicate dates and times, test methods, and instrument readings. 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 through G of this condition.
 - L. Compliance with the requirements of this condition does not assure compliance with requirements of 30 TAC Chapter 115, an applicable New Source Performance Standard (NSPS), or an applicable National Emission Standard for Hazardous Air Pollutants (NESHAPS) and does not constitute approval of alternative standards for these regulations.
4. Piping, Valves, Pumps, and Compressors in Ammonia (NH₃) Service
- A. Audio, olfactory, and visual checks for NH₃ leaks within the operating area shall be made once a shift.
 - B. Immediately, but no later than one hour upon detection of a leak, plant personnel shall take 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.

Pyrolysis Furnaces

5. The pyrolysis furnace associated with the Ethylene Cracker Project shall not exceed the firing rates (HHV) and emission factors as listed below except during de-coking and hot-standby as described in C through E of this condition:

EPN (FIN)	Description	Heat Input (MMBTU/hr)	Contaminant	Emission Factor
DDB-105	Furnace No. 105	495	NO _x	0.03 lb/MMBtu (hourly) 0.01 lb/MMBtu (annual)
			CO	0.044 lb/MMBtu
			PM ₁₀	6 lb/MMscf
			PM _{2.5}	3.4 lb/MMscf

A. Fuel for Furnace No. 105 shall include:

- (1) Pipeline-quality sweet natural gas containing no more than 0.25 grain hydrogen sulfide and 5 grains total sulfur per 100 dry standard cubic feet;
 - (2) Process fuel
- B. The fuel flow rate (lb/hr) of the fuel fired in the cracking furnace shall be continuously monitored and recorded. The heat input (MMBtu/hr, upper heating value basis) shall be calculated and the results recorded. A rolling 12-month annual average and the one-hour maximum firing rates shall be recorded. The upper heating value of the fuel fired in the furnace shall be determined at least daily to demonstrate compliance with the firing rates shown. Records of the annual average and one-hour maximum firing rates shall be maintained at the plant site for a period of five years and made available to representatives of the TCEQ upon request.
- C. Furnace No. 105 (DDB-105) may operate in hot standby mode 300 hours per year. Hot standby is defined as 70 percent or less of the maximum firing rate listed above when the furnace effluent is lined up normally (i.e., not lined up to the decoke stack). During hot standby operation for Furnace No. 105, the heat-based emission limits (lb/MMBtu) for NO_x and CO as stated above do not apply to these emission points. However, the lb/hr and ton per year (TPY) emission rate limits stated on the MAERT may not be exceeded for any unit under any operating condition. The

holder of this permit shall maintain monthly records and a cumulative 12-month total of the hours each unit is operated in hot standby mode.

- D. Total operating hours devoted to decoking the cracking furnaces shall not exceed 420 per rolling 12-month period. The holder of this permit shall maintain monthly records of the operating hours devoted to decoking. These records shall be maintained on-site for a period of five years and made available to representatives of the TCEQ upon request.
- E. The above heat specific factor requirements for NO_x (lb NO_x/MMBtu) are not applicable when the cracking furnace is in its decoking cycle; however, the NO_x mass emission rates specified in the MAERT shall not be exceeded when the cracking furnace is in its decoking cycle.
- F. The furnace shall be equipped with a Selective Catalytic Reduction (SCR) system for the control of NO_x emissions. The ammonia (NH₃) slip in the exhaust gas of Furnace No. 105 shall not exceed 20 ppmvd on an hourly basis and 10 ppmvd over a 24-hour period. The two limits shall be corrected to 3 percent O₂.
6. 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 Furnace Number 105 (EPN DDB-105) to demonstrate compliance with the emission factor for NO_x, CO, PM₁₀ and PM_{2.5}. 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 Texas Commission on Environmental Quality (TCEQ) Sampling Procedures Manual and the U.S. Environmental Protection Agency (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) Maximum furnace firing rate will be used to determine worst case emissions during the sampling period.
- B. 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.
- C. Air contaminants emitted from the Furnace Number 105 (EPN DDB-105) to be tested for include (but are not limited to) PM₁₀ and PM_{2.5}.
- D. Sampling shall occur within 60 days after achieving the maximum operating rate, but no later than 180 days after initial start-up of the facilities 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.
- E. The facility being sampled shall operate at maximum firing rate during stack emission testing. These conditions/parameters 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.
- F. During subsequent operations, if the firing rate is greater than 110% of that recorded during the test period as long as the new firing rate does not exceed 495 MMBTU/hr, stack sampling shall be performed at the new

operating conditions within 120 days. This sampling may be waived by the TCEQ Air Section Manager for the region.

G. 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.

7. If the emission factors for $PM_{1.0}$, and/or $PM_{2.5}$, are greater than those used in the initial permit application; an amendment will be submitted to correct these factors within 180 days of verifying the stack test results.

8. The permit holder shall install, calibrate, and maintain a continuous emission monitoring system (CEMS) to measure and record the in-stack concentration of NO_x , CO, and O_2 from Furnace No. 105.

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. Section 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, § 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 hourly period. The individual average concentrations shall be reduced to units of pounds per million BTU at least once every week as follows:
- D. The measured hourly average concentration from the CEMS shall be multiplied by the heat input rate recorded in accordance with Special Condition 5.B to determine the hourly emission rate.
- E. 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.
- F. 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.
- G. Quality-assured (or valid) data as described in Special Condition 8.C must be generated for each hour that Furnace No. 105 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 may be exempted

provided the total data loss period does not exceed 5 percent of the time that Furnace No. 105 operated over the previous rolling 12-month period. The measurements missed shall be estimated using engineering judgement 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.

9. The incoming natural gas shall be sampled quarterly to determine total sulfur. Test results from the fuel supplier may be used to satisfy this requirement.

Recordkeeping

10. Records required to show compliance with the following special conditions shall be kept:
 - A. Accessible valves shall be monitored quarterly as required by Special Condition (SC) 3-F.
 - B. Appropriate pump, compressor, and agitator seals shall be monitored with an approved gas analyzer at least quarterly per SC 3-G.
 - C. Audio, olfactory, and visual checks for NH_3 shall be made once a shift per SC 4-A.
 - D. The heating value of the fuel routed to Furnace No. 105 per SC5.B.
 - E. Total sulfur in the supplied fuel per SC 9.

Dated: September 26, 2012

Emission Sources - Maximum Allowable Emission Rates

Permit Number 97769

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)
DDB-105	Furnace No. 105	NOx	14.85	21.68
		CO	21.78	95.40
		VOC	3.55	15.53
		SO ₂	0.39	1.69
		NH ₃	4.77	10.45
		PM	2.84	12.43
		PM ₁₀	2.24	9.82
FUG-ADDF	Furnace No. 105 VOC Fugitives (5)	PM _{2.5}	1.28	5.59
		VOC	0.94	4.12
		NH ₃	0.02	0.10
		CO	103.46	2.48
		VOC	0.09	0.01
FUG-SCR2	Furnace No. 105 Ammonia Fugitives (5)	PM	2.29	0.05
		PM ₁₀	1.35	0.03
		PM _{2.5}	0.84	0.02
DDF-106	Furnace No. 105 Decoke Cyclone	VOC	0.09	0.01
		PM	2.29	0.05

Emission Sources - Maximum Allowable Emission Rates

- (1) Emission point identification - either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3) VOC
 - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
 - NO_x
 - total oxides of nitrogen
 - SO₂
 - sulfur dioxide
 - PM
 - total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented
 - PM₁₀
 - total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented
 - PM_{2.5}
 - particulate matter equal to or less than 2.5 microns in diameter
 - CO
 - carbon monoxide
 - NH₃
 - 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: September 26, 2012