TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 22, 2020

MR DAVID CONSTANT
ENVIRONMENTAL MANAGER
PERFORMANCE MATERIALS NA INC
PO BOX 1089
ORANGE TX 77631-1089

Re: Declaration of Administrative Completeness Permit Application
Permit Number: 160845
Performance Materials NA, Inc.
Sabine River Plant
Orange, Orange County
Customer Reference Number: CN605593805
Regulated Entity Number: RN100542711

Dear Mr. Constant:

The Texas Commission on Environmental Quality (TCEQ) has declared the above-referenced application, received on April 2, 2020, administratively complete on April 22, 2020.

You are now required to publish notice of your proposed activity. To help you meet the regulatory requirements associated with this notice, we have included the following items:

- Notices for Newspaper Publication (Examples A and B)
- Sign Posting Example (Example C)
- Public Notice Checklist
- Instructions for Public Notice
- Affidavit of Publication for Air Permitting (Form TCEQ-20533) and
- Alternative Language Affidavit of Publication for Air Permitting (Form TCEQ-20534)
- Web link to download Public Notice Verification Form (refer to Public Notice Instructions)
- Notification List

Please note that it is very important that you follow all directions in the enclosed instructions. If you do not, you may be required to republish the notice. Some common errors are the unauthorized changing of notice wording or font, omission of air contaminants, and inaccurate plant site location information represented in the application. Additional information can be found at www.tceq.texas.gov/permitting/air/bilingual/how1_2_pn.html or **if you have any questions, please contact us before you proceed with publication.**

A "Public Notice Checklist" is enclosed which notes the time limitations for each step of the public notice process. **The processing of your application may be delayed if these time limitations are not met (i.e.; submitting proof of publication of the notice within 10 business days after publication, affidavits of publication within 30 calendar days after the date of publication, and public notice verification form within 10 business days after the end of the designated comment period).** This checklist should be used as a tool in conjunction with the enclosed, detailed instructions.

Re: Permit: 160845

If you do not comply with **all** requirements described in the instructions, the TCEQ cannot continue processing the application and may take other actions. Please note that as your application undergoes the technical review, we may request additional information.

If you have any questions regarding publication requirements, please contact the Office of the Chief Clerk at (512) 239-3300. If you have any other questions, please contact Mr. Steven Piper at (512) 239-1589.

Sincerely,

Johnny D. Bowers, Team Leader
Air Permits Initial Review Team
Air Permits Division
Texas Commission on Environmental Quality

Enclosures

cc: Air Section Manager, Region 10 - Beaumont
Air Permits Section Chief, New Source Review Section (6PD-R), U.S. Environmental Protection Agency, Region 6, Dallas

Project Number: 314461

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

EXAMPLE A

NOTICE OF RECEIPT OF APPLICATION AND INTENT TO OBTAIN AIR PERMIT

PROPOSED AIR QUALITY PERMIT NUMBER 160845

APPLICATION Performance Materials NA, Inc., has applied to the Texas Commission on Environmental Quality (TCEQ) for:
Issuance of Permit 160845

This application would authorize construction of a Hazardous Waste Incinerator within their Sabine River Operations located at 3055 Farm-Market Road 1006, Orange, Orange County, Texas 77630. 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. http://www.tceq.texas.gov/assets/public/hb610/index.html?lat=30.056111&lng=-93.753888&zoom=13&type=r. The facility will emit the following contaminants: carbon monoxide, hazardous air pollutants, sulfuric acid mist, reduce sulfur, hydrogen sulfide, fluorides, nitrogen oxides, organic compounds, particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less, lead and sulfur dioxide.

This application was submitted to the TCEQ on April 2, 2020. The application will be available for viewing and copying at the TCEQ central office, the TCEQ Beaumont regional office, and www.dow.com/TX-permits ,beginning the first day of publication of this notice. The facility's compliance file, if any exists, is available for public review in the Beaumont regional office of the TCEQ.

The executive director has determined the application is administratively complete and will conduct a technical review of the application.

PUBLIC COMMENT/PUBLIC MEETING You may submit public comments, or request a public meeting or a contested case hearing to the Office of the Chief Clerk at the address below. The TCEQ will consider all public comments in developing a final decision on the application. After the deadline for public comments, the executive director will prepare a response to all public comments.

The purpose of a public meeting is to provide the opportunity to submit comments or ask questions about the application. A public meeting about the application will be held 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.

After technical review of the application is complete, the executive director may prepare a draft permit and will issue a preliminary decision on the application. Notice of Application and Preliminary Decision for an Air Quality Permit will then be published and mailed to those who made comments, submitted hearing requests or are on the mailing list for this application. That notice will contain the final deadline for submitting public comments.

OPPORTUNITY FOR A CONTESTED CASE HEARING You may request a contested case hearing. A contested case hearing is a legal proceeding similar to a civil trial in state district court. A contested case hearing will only be granted based on disputed issues of fact that are relevant and material to the Commission's decision. Further, the Commission will only grant a hearing on those issues submitted during the public comment period and not withdrawn. **The deadline to submit a request for a contested case hearing is 30 days after newspaper notice is published. If a request is timely filed, the deadline for requesting a contested case hearing will be extended to 30 days after the mailing of the response to comments.**

A person who may be affected by emissions of air contaminants from the facility is entitled to request a hearing. If requesting a contested case hearing, you must submit the following: (1) your name (or for a group or

association, an official representative), mailing address, and 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 an 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.

If a hearing request is timely filed, following the close of all applicable comment and request periods, the Executive Director will forward the application and any requests for contested case hearing to the Commissioners for their consideration at a scheduled Commission meeting. 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. **If a hearing is granted, the subject of a hearing will be limited to disputed issues of fact or mixed questions of fact and law relating to relevant and material air quality concerns submitted during the comment period.** Issues such as property values, noise, traffic safety, and zoning are outside of the Commission's jurisdiction to address in this proceeding.

MAILING LIST In addition to submitting public comments, you may ask to be placed on a mailing list to receive future public notices for this specific application by sending a written 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/, 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 Performance Materials NA, Inc., P.O. Box 1089, Orange, Texas 77631-1089 or by calling Ms. Cheryl Steves, Environmental Manager at (979) 238-5832.

Notice Issuance Date: April 22, 2020

April 1, 2020

Electronic submittal via ePermits

Mr. Johnny Bowers
Texas Commission on Environmental Quality (TCEQ)
Air Permits Initial Review Team (APIRT), MC-161

Performance Materials NA, Inc. CN605593805
Sabine River Operations, RN100542711
Hazardous Waste Incinerator New Permit

Dear Mr. Bowers,

Performance Materials, NA (a wholly owned subsidiary of Dow Chemical) is requesting a new permit be created for an existing hazardous waste incinerator located at the Sabine River site in Orange Texas. The incinerator is currently authorized in NSR 9629 with the Cogeneration unit. This application is the initial application for a new permit for the incinerator and should be coordinated with the application to amend NSR 9629, which is being submitted at the same time as this application. Both applications are submitted via ePermits in STEERS.

Details of this request are discussed in the remainder of this submittal. For future correspondence I can be contacted at (979) 238-5832 or via email at clsteves@dow.com.

Respectfully,

Cheryl Steves
Environmental Manager,
The Dow Chemical Company

Enclosure/cls

cc
D. Constant
A. Jorgensen
S. Barger

Project Overview

Performance Materials is requesting a new permit be created for the Hazardous Waste Incinerator. In June 2011, NSR 9629 was amended to incorporate air emissions from the incinerator that were previously authorized in Hazardous Waste Permit 50230 at the request of TCEQ (project 137897).

This project will move the incinerator and related emission points into a new, stand-alone NSR permit for the incinerator. The Cogeneration unit and associated emission points will remain in NSR 9629. As part of the project, certain special conditions will move to the new permit as they are only applicable to the incinerator, special conditions related to the cogeneration unit will remain in NSR 9629, and some special conditions will need to appear in both permits as they are general in nature.

The remainder of this document will detail the changes necessary to complete the request to move the incinerator and associated emission points into a new NSR permit.

- Attachment I contains a redlined version of the current NSR permit showing which permit conditions should be moved to the incinerator air permit.
- Attachment II contains a redlined version of the current NSR permit showing the EPNs that need to be moved to the incinerator air permit.

Special Conditions

The following table depicts the conditions that require transfer and duplication from this permit, NSR 9629, into the new permit.

In addition, some minor edits are necessary for existing conditions in NSR 9629.

Special Condition No.	Remains in NSR 9629	Include in New Permit for Incinerator	Comments
1	yes	yes	
2	yes	yes	
3	yes	no	This condition references federal regulations that only apply to the cogeneration unit
4	yes	yes	
5	yes	no	
6	yes	no	
7	yes	no	
8	yes	no	
9	yes	no	
10	yes	no	
11	yes	no	
12	yes	no	
13	yes	no	
14	no	yes	
15	no	yes	
16	no	yes	
17	no	yes	
18	no	yes	
19	no	yes	
20	no	yes	
21	no	yes	
22	no	yes	
23	no	yes	
24	no	yes	
25	no	yes	
26	no	yes	
27	no	yes	
28	no	yes	
29	no	yes	
30	yes	yes	

Special Condition No.	Remains in NSR 9629	Include in New Permit for Incinerator	Comments
31	yes	yes	This condition will need slight changes to wording to remove references to the Cogen Unit in the incinerator permit and to remove references to the Incinerator in the Cogen Unit permit.
32	yes	yes	
33	yes	yes	
34	yes	yes	
35	yes	yes	
36	yes	yes	
37	yes	yes	
38	yes	yes	Was this condition present in the Cogen permit when MSS was added (prior to addition of incinerator)?

MSS Attachment Tables

	Remains in NSR 9629	Include in New Permit for Incinerator	Comments
Attachment A	yes	yes	
Attachment B	yes	yes	
Attachment C	yes	yes	see next page for changes

Attachment C MSS Activity Summary

Facilities	Description	Emissions Activity	EPN	Action
Turbine EPN PG-14	Start-up and shutdown of turbine	vent to atmosphere	PG-14MSS	Remains with NSR 9629
Vacuum Trucks	Remove liquids from storage tanks	vent to atmosphere	VAC-LOAD	Remains with NSR 9629
Fixed Roof Storage Tanks	Storage Tank Draining and Degassing for cleaning and inspections	vent to atmosphere	TANK-DEGAS	Remains with NSR 9629
Fixed Roof Storage Tanks	Storage Tank Draining and Degassing for cleaning and inspections	vent to control	INC-MAINT	Moves to Incinerator Permit
Cogeneration units	Natural gas venting	vent to atmosphere	FUEL-VENT	Remains with NSR 9629
Compressor Systems	Online water washing (desooting) activities	vent to atmosphere	ONLINE-WASH	Remains with NSR 9629
Turbine EPN PG-14	Turbine lube demister venting	vent to atmosphere	OILMIST	Remains with NSR 9629
Liquid process lines	Draining and Degassing for inspections and maintenance	vent to atmosphere	LINE-PURGE	Moves to Incinerator Permit
Incinerator	Refractory Replacement and Curing	vent to atmosphere	REFR-REPL	Moves to Incinerator Permit
see Attachment A	miscellaneous low emitting activities	see Attachment A	FUG-MAINT	Moves to Incinerator Permit

MAERT Changes

NSR 9629 includes emission points and allowables for the Cogeneration Unit and Incinerator. The following table summarizes those EPNs (and allowables) that need to remain in NSR 9629 and those that should be moved to the MAERT for the new permit.

EPN	Remains in NSR 9629	Include in New Permit for Incinerator	Comments
PG-14	yes	no	
LUBEOIL-TK	yes	no	
BLDG-SUMP	yes	no	
WASH-SUMP	yes	no	
DECANT-OIL	yes	no	
INC-001	no	yes	
INC-002	no	yes	
INC-CT01	no	yes	
INC-FWD	no	yes	
INC-LOAD	no	yes	
INC-SAMPLE	no	yes	
INC-SP	no	yes	
INC-SCB	no	yes	
INC-CSCB	no	yes	
INC-TFCB	no	yes	
INC-REPAC	no	yes	
PG-14MSS	yes	no	
INC-MAINT	no	yes	
INC-ASH	no	yes	
INC-SLAG	no	yes	
VAC-LOAD	yes	no	
VAC-UNLOAD	no	yes	
TANK-DEGAS	yes	no	
FUEL-VENT	yes	no	
ONLINE-WASH	yes	no	
OILMIST	yes	no	
FUG-MAINT	no	yes	
LINE-PURGE	no	yes	
REFR-REPL	no	yes	
TANK-VENT	no	yes	
INC-TRANS	no	yes	
INC-ADD	no	yes	

ATTACHMENT I

New Permit Proposed Special Conditions

Special Conditions
Permit Number TBD

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

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 GG, Standards of Performance for Stationary Gas Turbines

   C. Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units

Emissions Limitations and Operating Requirements

4. A copy of this permit shall be kept at the plant site and made available at the request of personnel from the Texas Commission on Environmental Quality (TCEQ) or any air pollution control agency. In addition, the holder of this permit shall maintain on file a cross reference between permit emission point numbers (EPNs) and equipment identification numbers currently on the turbine and duct burner.

5. Fuel fired in the Gas Turbine (EPN PG-14) operated under this permit is limited to pipeline-quality natural gas containing no more than 0.25 grain of hydrogen sulfide and 3.7 grains of sulfur per 100 dry standard cubic feet. Fuel fired in the Duct Burner (EPN PG-14) operated under this permit is limited to pipeline-quality natural gas as previously defined and off-gas from the cyclohexane oxidation process. The duct burner will only fire volatile organic compounds off-gas when both of the cogeneration units, authorized under Permit Number 40496, are unavailable. Use of any other fuel will require prior authorization from the TCEQ.

6. The duct burner shall be limited to a maximum firing rate of no more than 200 million British thermal units per hour (MMBtu/hr) fuel higher heating value (HHV), and emissions shall not exceed 0.12 pound (lb) nitrogen oxides (NO_x)/MMBtu and 9.02 lb carbon monoxide (CO)/MMBtu heat input (HHV).

7. Opacity of emissions from the Cogeneration Train (EPN PG-14) must not exceed 5 percent averaged over a six-minute period except during periods of start-up or shutdown.

8. Emission concentrations of NO_x and CO in the stack gases from the cogeneration train shall not exceed the following block one-hour average concentration limits (except as specified in Special Condition No. 11 and during periods of MSS):

   A. Gas turbine firing only:

      NO_x 42 parts per million by volume, dry (ppmvd)

      CO 10 ppmvd

   B. Gas turbine firing and duct burner firing:

      NO_x 42 ppmvd

CO 500 ppmvd

The NO_x emission limits are expressed on a dry basis at 15 percent oxygen (O_2). Measured concentrations at the exhaust stack shall be expressed accordingly.

Initial Demonstration of Compliance

9. The holder of this permit 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 Cogeneration Train (EPN PG-14). Sampling must be conducted in accordance with the appropriate procedures of the TCEQ Sampling Procedures Manual and in accordance with EPA Reference Method 9 for opacity (consisting of 30 six-minute readings as provided in 40 CFR § 60.11[b]); Reference Method 10 for the concentration of CO; and Reference Method 20 for the concentrations of NO_x and O_2.

The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense.

A. The TCEQ Beaumont Regional Office shall be contacted as soon as testing is scheduled but not less than 45 days prior to sampling to schedule a pretest meeting.

The notice shall include:

(1) 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) Method for determining turbine load both before and after sampling.

(7) A test plan to develop, during the initial testing, the relationship between

(a) The steam-to-fuel injection rate and the NO_x emission rate from the turbine.

(b) The turbine load and the CO hourly emissions rate.

The purpose of the pretest meeting is to review and formalize the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, to identify each operating parameter which is significant to maintaining emission compliance, and to review the format procedures for submitting the test reports.

A written proposed description of any deviation from sampling procedures specified in permit conditions or TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Director shall approve or disapprove of any deviation from specified sampling procedures. Requests to waive testing for any pollutant specified in Paragraph B of this condition shall be submitted to the TCEQ Air Permits Division. Test waivers and alternate/equivalent procedure proposals for New Source Performance Standards testing which must have EPA approval shall be submitted to the TCEQ Regional Office. Any equivalent test procedures or any test waivers must be approved by the TCEQ prior to the date required in Special Condition No. 9D for conducting the tests.

B. Air contaminants emitted from the Cogeneration Train (EPN PG-14) to be tested for include (but are not limited to): NO_x, CO, O_2, and opacity. The NO_x, CO, and O_2 shall be sampled concurrently while the turbine is firing at 80 percent load and 100 percent load with the duct

burner unfired for the atmospheric conditions occurring during the test. The 100 percent load is defined as base load with primary NO_x steam injected at the turbine burners only. Opacity shall be determined both with the turbine firing alone and with the turbine and duct burner firing together. The NO_x and CO concentrations shall be corrected and reported according to Special Condition Nos. 1, 6, and 8. This testing will be used to demonstrate initial compliance with Special Condition Nos. 1, 6, and 8.

C. Duct burner emissions shall be determined as follows: NO_x and CO shall be determined at the cogeneration train exhaust while the duct burner is firing at the maximum feasible rate, and the turbine is operating at maximum firing rate for the ambient conditions occurring during the test. The difference between these emissions and those measured with the turbine firing alone shall determine the emissions from the duct burner.

D. Sampling of the facility shall occur within 60 days after achieving maximum production rates but no later than 180 days after the initial start-up of the duct burner modification. Requests for additional time to perform sampling shall be submitted to the TCEQ Regional Office. Additional time to comply with the applicable requirements of 40 CFR Part 60 requires EPA approval, and requests shall be submitted to the TCEQ Regional Office.

E. Three copies of the final sampling report shall be forwarded to the TCEQ within 45 days after sampling is completed. Sampling reports shall comply with the attached conditions of Chapter 14 of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows:

One copy to the TCEQ Austin Office of Air, Air Permits Division.

One copy to the TCEQ Beaumont Regional Office.

The report shall include the following:

(1) A copy of the correlation of steam-to-fuel injection ratios to NO_x concentrations which will be used to demonstrate compliance with the turbine NO_x concentration limitations of Special Condition Nos. 1 and 8.

(2) A copy of the correlation of turbine load to CO concentrations to demonstrate compliance with the turbine CO emissions limitations of Special Condition Nos. 1 and 8.

Continuous Demonstration of Compliance

10. The holder of this permit shall install, calibrate, maintain, and operate a continuous monitoring system to monitor and record the natural gas consumption and the ratio of steam-to-fuel being fired in the turbine. The system shall be accurate to ±5.0 percent and the system shall be approved by the Executive Director of the TCEQ prior to conducting the initial compliance demonstration required under Special Condition No. 9.

11. After the demonstration of initial compliance required in Special Condition No. 9, the steam-to-fuel ratio monitoring required in Special Condition No. 10 shall constitute the method for demonstrating continuous compliance with the turbine NO_x emission limitations of Special Conditions Nos. 1 and 8. When primary NO_x steam is lost or reduced, the facility will use augmentation steam, if available, to control NO_x emissions. When augmentation steam is used to control NO_x emissions, the facility will be required to comply with a NO_x emission limit of 96 ppmv (which corresponds to 375 lb/hr). If augmentation steam is not available, the facility will report the upset as required by Title 30 Texas Administrative Code § 101.6 (30 TAC § 101.6).

Recordkeeping Requirements

12. The following information shall be recorded and maintained by the holder of this permit for a period of five years and shall be made available on request to representatives of the TCEQ, EPA, or any local air pollution control program having jurisdiction:

    A. A copy of the most recent version of this permit.

    B. The results of all fuel sampling conducted pursuant to Special Condition No. 5.

    C. The results of all stack tests conducted pursuant to Special Condition No. 9.

    D. Written records of the occurrence and duration of any turbine or duct burner malfunctions which may cause emissions in excess of the permitted allowables and the actions taken to correct the malfunction.

    E. Records of the following shall be made and maintained on a two-year rolling retention basis to show compliance with hourly and annual NO_x and CO emission rates:

        (1) Records of the hours of operation, fuel type, and firing rate of the duct burner and calculations of predicted hourly NO_x and CO emissions from the duct burner contribution.

        (2) Records of hours of operation, firing rate, and the turbine load and the predicted turbine CO emissions. These predictions will be derived from the CO versus turbine load chart developed during initial performance testing.

        (3) Records of the turbine steam-to-fuel ratio.

Reporting Requirements

13. The holder of this permit shall submit semiannual reports as described in 30 TAC § 117.145(d) for both the continuous emissions monitoring system and steam-to-fuel ratio monitoring system.

    A. In addition to 30 TAC §117.145(d), non-complying emissions of NO_x are each one hour period during which the calculated emissions of NO_x from the duct burner exceed those specified in Special Condition Nos. 1, 6, and 8.

    B. Non-complying emissions of CO are defined as each one-hour period of operation, except during start-up or shutdown, during which the calculated emissions of CO exceed the emission limitations of Special Condition Nos. 1, 6, and 8. Calculated turbine emissions for demonstration of compliance with Special Condition Nos. 1 and 8 shall be obtained using the relationship of CO emissions to turbine load determined pursuant to Special Condition No. 9. Calculated duct burner emissions for demonstration of compliance with Special Condition Nos. 1, 6, and 8 shall be based on the cyane oxidation off-gas CO content and a 50 percent destruction and removal efficiency. Non-complying emission reports for this pollutant shall be submitted along with reports for NO_x.

    C. Non-complying emissions of sulfur dioxide (SO_2) are defined as any sample of fuel which is found to contain sulfur in excess of the limits of Special Condition No. 5, or which indicates exceedance of the SO_2 limitation required in Special Condition No. 1, based on 100 percent conversion of the sulfur in the fuel to SO_2. Non-complying emission reports for this pollutant shall be submitted along with reports for NO_x.

Hazardous Waste Incinerator

14. These facility units shall be operated in compliance with all applicable requirements relating to air quality in the resource Conservation and Recovery Act (RCRA) and the rules promulgated there under, and in Title 30 Texas Administrative Code (30 TAC) Chapter 335, subchapter F (relating to Permitting Standards for Owners and Operators of Hazardous Waste Storage, Processing, and Disposal Facilities), promulgated by the Texas Commission on Environmental Quality (TCEQ) pursuant to the Solid Waste Disposal Act of the Texas Health and Safety Code, Chapter 361.

15. The facilities operated under this permit shall comply with all applicable requirements of the U.S Environmental Protection Agency (EPA) regulations on Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities in Title 40 Code of Federal regulations Part 264 (40 CFR Part 264), Subparts A and O where applicable.

16. The facilities operated under this permit shall comply with all applicable requirements of the EPA regulations for the following:

    A. 40 CFR Part 60, Subpart A - General Provisions;

    B. 40 CFR Part 61, Subpart A - General Provisions:

    C. 40 CFR Part 61, Subpart C - National Emission Standard for Beryllium;

    D. 40 CFR Part 61, Subpart E - National Emission Standard for Mercury;

    E. 40 CFR Part 61, Subpart F - National Emission Standard for Vinyl Chloride;

    F. 40 CFR Part 61, Subpart M - National Emission Standard for Asbestos;

    G. 40 CFR Part 61, Subpart V - National Emission Standard for Equipment Leaks (Fugitive Emission Sources);

    H. 40 CFR Part 61, Subpart FF - National Emission Standard for Benzene Waste Operations;

    I. 40 CFR Part 63, Subpart A - General Provisions;

    J. 40 CFR Part 63, Subpart DD - National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations;

    K. 40 CFR Part 63, Subpart EEE - National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors.

17. If the carbon monoxide CEMS detects a response that results in a one-minute average at or above the 3,000 ppmv span limit while burning hazardous waste, the one-minute average must either be recorded as 10,000 ppmv and used in the calculation of the hourly rolling average or an automatic waste feed cutoff shall occur and the hazardous waste feed shall not be restarted until rolling average below 100 ppmv is re-established with a sixty one-minute readings subsequent to the automatic waste feed cutoff. If a 10,000 ppmv span analyzer is used, the actual reading shall be used in the calculation of the hourly rolling average.

Incinerator Performance and Testing Requirements

18. The permittee will conduct analysis of the waste feed and sampling in accordance with the Feedstream Analysis Plan (initially submitted as part of the Comprehensive Performance Test Plan, as amended per 40 CFR 63, Subpart EEE). All emissions sampling, testing, and procedures to establish proof of performance shall be documented in the Comprehensive Performance Test Plan, the Confirmatory Test Plan, and submitted to the Executive director of the TCEQ. The TCEQ Executive Director, or designated representative, shall be afforded the opportunity to observe all such testing. The permit holder is responsible for providing sampling and analysis at his expense.

19. The permittee may conduct additional shakedown and testing in accordance with a test plan or Trial Burn Plan approved by the Executive Director. The permittee may conduct 720 hours of additional shakedown prior to conducting the tests. The results from the additional testing shall be used for the purpose of determining compliance with the performance standards of 40 CFR 264.343 (if applicable) or 40 CFR Part 63, Subpart EEE. After the approved testing is completed, the incinerator shall be operated in accordance with the operating conditions in effect prior to the commencement of the testing. The permittee may request a permit amendment pursuant to 30 TAC 116.116 to incorporate the new operating conditions demonstrated by the trial burn results.

20. Exhaust emissions shall be monitored as described in the Comprehensive Test Plan, Confirmatory Test Plan, or other testing as described by 40 CFR 63, Subpart EEE, at a frequency determined by 40 CFR 63, Subpart EEE.

    A. The permittee shall submit an original and four copies of a stack test plan to the TCEQ Executive Director at least 60 days prior to sampling and analysis. At a minimum, the test plan shall include the following, prepared in accordance with USEPA guidance:

21. A Sampling and Analysis Plan (SAP) describing the parameters to me tested, monitored and/or analyzed; and

22. A Quality Assurance Project Plan.

    A. Air contaminants emitted from the Hazardous Waste Incinerator (EPN INC-001) to be tested by the Comprehensive Test include (but are not limited to) particulate matter (PM) including particulate matter equal to or less than 10 microns in diameter (PM_{10}) as required by 40 CFR 63 Subpart EEE.

    B. The facility being sampled shall operate while waste feed is being introduced 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.

    C. The Waste Section of the appropriate TCEQ regional office shall be contacted a minimum of 60 days prior to sampling to schedule a pretest meeting.

    D. An original and four copies of the final sampling report shall be forwarded to the Executive Director within 90 days after receipt of the sampling results, unless the Executive Director or designate issues an extension per 40 CFR 63, Subpart EEE.

23. The permittee shall maintain and operate the hazardous waste incinerator (EPN INC-001) so that when operated in accordance with the operating conditions specified in this permit will meet the following performance standards:

    A. A destruction and removal efficiency (DRE) of 99.99 percent for each principle organic hazardous constituent in each waste feed.

    B. Emissions of particulate matter not to exceed 34 mg/dscf corrected to 7% oxygen.

    C. Visible emissions, not including uncombined water, shall not exceed an opacity of 5 percent averaged over a six-minute period, except that visible emission during the cleaning of a firebox, soot blowing, equipment changes, and ash removal may exceed this opacity for a

period aggregating not more than 6 minutes in any 60 consecutive minutes nor more than 6 hours in any 10-day period.

D. In addition to the requirements specified in this permit, the incinerator system shall operate in accordance with all applicable conditions of Industrial Solid Waste Management Permit Number HW-50230. Any deviation from or modification to Permit Number HW-50230 which would result in a change or increase in air emissions or may conflict with a condition of this permit shall require notification to the Air Permits Division of the Texas Commission on Environmental Quality (TCEQ) prior to the deviation and may require a modification to this permit.

E. Throughout normal operations, the holder of this permit shall conduct sufficient waste analysis in accordance with the Waste Analysis Plan (WAP) and Feed Stream Analysis Plan (FSAP) required by Industrial Solid Waste Management Permit Number HW-50230 and the Hazardous Waste Combustor (HWC) MACT Notice of Compliance. Compliance with the most recently approved WAP and FSAP, as applicable, will be necessary for demonstrating continuous compliance with the feed rate limits and emissions authorized in this permit.

Incinerator Continuous Demonstration of Compliance

24. The permit holder shall install, calibrate, and maintain a continuous emission monitoring system (CEMS) to measure and record the in-stack concentrations of NO_x, CO, and oxygen from the incinerator stack (EPN INC-001).

A. The CEMS shall meet the design and performance specifications, pass the field tests, and meet the installation requirements and data analysis and reporting requirements specified in the applicable Performance Specifications Nos. 1 through 10, 40 CFR Part 60, Appendix B and 40 CFR Part 266, Appendix IX, Section 2.1.

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. 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 the permit allowable emission rate table in lb/hr at least once every day as follows:

The measured hourly average concentration from the CEMS shall be multiplied by the exhaust gas flow rate as measured by a differential pressure averaging pitot tube flow meter to determine the hourly emission rate.

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 hazardous waste incinerator 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 it does not exceed 5 percent of the time (in minutes) that the hazardous waste incinerator 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.

Fugitives
Piping, Valves, Connectors, Pumps, Agitators and Compressors, in contact with VOC - Intensive Directed Maintenance – 28MID

25. Except as may be provided for in the Special Conditions of this permit, the following requirements apply to the above-referenced equipment (EPN INC-002):

A. The requirements of paragraphs F and G shall not apply (1) where the volatile organic compounds (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 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, agitators, 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 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 by the end of the 72 hours period following the creation of the open ended line and monthly thereafter with an approved gas analyzer and the results recorded. For turnarounds and all other situations, leaks are indicated by readings of 500 ppmv and must be repaired within 24 hours or a cap, blind flange, plug, or second valve must be installed on the line or valve.

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

A check of the reading of the pressure-sensing device to verify disc integrity shall be performed 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.

An approved 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.

A directed maintenance program shall consist of the repair and maintenance of components assisted simultaneously by the use of an approved gas analyzer such that a minimum concentration of leaking VOC is obtained for each component being maintained. A first attempt to repair the leak must be made within 5 days. Records of the first attempt to repair shall be maintained. Replaced components shall be re-monitored within 15 days of being placed back into VOC service.

G. All new and replacement pumps, compressors, and agitators shall be equipped with a shaft sealing system that prevents or detects emissions of VOC from the seal. These seal systems need not be monitored and 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.

All other pump, compressor, and agitator seals shall be monitored with an approved gas analyzer at least quarterly.

H. Damaged or leaking valves, connectors, compressor seals, pump seals, and agitator seals 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. 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. 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.

I. In lieu of the monitoring frequency specified in paragraph F, valves in gas and light liquid service may be monitored on a semiannual basis if the percent of valves leaking for two consecutive quarterly monitoring periods is less than 0.5 percent.

Valves in gas and light liquid service may be monitored on an annual basis if the percent of valves leaking for two consecutive semiannual monitoring periods is less than 0.5 percent.

If the percent of valves 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.

J. The percent of valves leaking used in paragraph I shall be determined using the following formula:

(Vl + Vs) x 100/Vt = Vp

Where:

Vl = the number of valves found leaking by the end of the monitoring period, either by Method 21 or sight, sound, and smell.

Vs = the number of valves for which repair has been delayed and are listed on the facility shutdown log.

Vt = the total number of valves in the facility subject to the monitoring requirements, as of the last day of the monitoring period, not including nonaccessible and unsafe-to-monitor valves.

Vp = the percentage of leaking valves for the monitoring period.

K. 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.

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, or an applicable National Emission Standard for Hazardous Air Pollutants and does not constitute approval of alternative standards for these regulations.

Incinerator Sampling

26. Incinerator sampling (EPN INC-SAMPLE) are limited to the sample type identified below.

Sample Type	Samples per Hour	Samples per Year
Drums	96	35,040
Trucks-normal	16	10,714
Trucks-rear	-	312
Tanks	13	683
Pipeline	1	365

All rolling 12 month sampling frequency records shall be updated on a monthly basis for each sample type.

Incinerator Container Transfers

27. All vents from the receiving containers shall be routed to carbon cannisters.

28. The permit holder shall maintain and update a monthly emissions record which includes calculated emissions of VOC from waste transferring (EPN INC-TRANS) over the previous rolling 12 month

period. The record shall include the type of containers, control method used, numbers of transferring, name of the waste, gas molecular weight, gas temperature in degrees Fahrenheit, gas vapor pressure at the liquid temperature in psia, gas throughput for the previous month and rolling 12 months to date.

Incinerator Container Additives

29. The permit holder shall maintain and update a monthly emissions record which includes calculated emissions of particulate matter from adding additives (EPN INC-ADD) over the previous rolling 12 month period. The record shall include the name of additives, numbers of batch in a year, numbers of batch in an hour, and weight of additives for the previous month and rolling 12 months to date.

Maintenance, Start-up and Shutdown

30. Planned maintenance, startup, and shutdown (MSS) emissions due to the activities identified in Special Condition No. 31 are authorized provided the facilities and emissions are compliant with the MAERT and special conditions. This permit authorizes emissions from the following temporary facilities used to support planned MSS activities at permanent site facilities: frac tanks, containers, vacuum trucks, and controlled recovery systems. Emissions from temporary facilities are authorized provided the temporary facility (a) does not remain on the plant site for more than 12 consecutive months, (b) is used solely to support planned MSS activities at the permanent site, and (c) does not operate as a replacement for an existing authorized facility.

31. This permit authorizes emissions for the planned MSS activities summarized in the MSS Activity Summary (Attachment C) attached to this permit.

    Attachment A identifies the inherently low emitting MSS activities that may be performed at the ~~DuPont Cogen Unit and the~~ Hazardous Waste Incinerator. Emissions from activities identified in Attachment A shall be considered to be equal to the potential to emit represented in the permit renewal dated May 24, 2013 and subsequent changes notes through June 2019. The estimated emissions from the activities listed in permit renewal dated May 24, 2013 and subsequent changes notes through June 2019, Attachment A must be revalidated annually. This revalidation shall consist of the estimated emissions for each type of activity and the basis for that emission estimate.

    Routine maintenance activities, as identified in Attachment B may be tracked through the work orders or equivalent. Emissions from activities identified in Attachment B shall be calculated using the number of work orders or equivalent that month and the emissions associated with that activity identified in the permit renewal dated May 24, 2013 and subsequent changes notes through June 2019.

    The performance of each planned MSS activity not identified in Attachments A or B and the emissions associated with it shall be recorded and include at least the following information:

    A. the process unit 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 on which the MSS activity occurred;

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 renewal dated May 24, 2013 and subsequent changes notes through June 2019, consistent with good engineering practice.

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

32. Process units and facilities, with the exception of those identified in Special Condition No. 35 and Attachment A, 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 while degassing is occurring.

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 are or to monitor VOC concentration following controlled depressurization. The venting shall be minimized to the maximum extent practicable and action taken recorded, the control device or recovery system utilized shall be recorded with the estimated emissions from controlled and uncontrolled degassing calculated using the methods that were used to determine allowable emissions for the permit application.

(1) For MSS activities identified in Attachment B, the following option may be used in lieu of (2) below. The facilities being prepared for maintenance shall not be vented directly to atmosphere until the VOC concentration has been verified to be less than 10 percent of the lower explosive limit (LEL) per the site safety procedures.

(2) The locations and/or identifiers where the purge gas or steam enters the process equipment or storage vessel and the exit points for the exhaust gases shall be recorded. 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 33. 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.

E. Gases and vapors with VOC partial pressure greater than 0.50 psi may be vented directly to atmosphere if all the following criteria are met:

(1) It is not technically practicable to depressurize or degas, as applicable, into the process.

(2) There is not an available connection to a plant control system.

(3) There is no more than 50 lb of air contaminant to be vented to atmosphere during shutdown or startup, as applicable.

All instances of venting directly to atmosphere per Special Condition 31.E must be documented when occurring as part of any MSS activity. The emissions associated with venting without control must be included in the work order or equivalent for those MSS activities identified in Attachment B.

33. Air contaminant concentration 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

(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.

(1) 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.

(2) A functionality test shall be performed on each detector within 24 hours of use with a certified gas standard at 25% of the LEL for pentane. The LEL monitor shall read no lower than 90% of the calibration gas certified value. Records, including the date/time and test results, shall be maintained.

(3) A certified methane gas standard equivalent to 25% of the LEL for pentane may be used for calibration and functionality tests provided that the LEL response is within 95% of that for pentane.

(4) If an MSA Sirius multigas, Altair 5, or other meter using a catalytic bead sensor technology is used to measure LEL, a certified pentane gas standard at 58% of the LEL for pentane or certified methane gas standard equivalent to 58% of the LEL for pentane may be used for calibration and functionality testing in lieu of the 25% gas standard specified in paragraphs C1, C2, and C3 of this condition.

34. 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;

A. a cap, blind flange, plug, or second valve must be installed on the line or valve; or

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

35. Fixed-roof storage tanks shall not be opened or ventilated without control, except as allowed by subparagraph A below, until one of the criteria in subparagraph B of this condition is satisfied. If the ventilation of the vapor space is controlled, the emission control system shall meet the requirements of subparagraph C of this condition. Records shall be maintained per subparagraph D of this condition.

    A. Minimize air circulation in the tank vapor space.

        (1) One man-way may be opened to allow access to the tank to remove or de-volatize the remaining liquid. Other man-ways or access points may be opened as necessary to remove or de-volatize the remaining liquid. Wind barriers shall be installed at all open man-ways 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 TVP less than 0.02 psia. These criteria shall be demonstrated in any one of the following ways:

        (1) A low VOC TVP 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 the 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 Part 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 1,000 ppmv using EPA Method 1664 (may also use 8260B or 5030 with 8015 from SW-846).

            (c) Stop ventilation and close the tank for at least 24 hours. When the tank man-way is opened after this period, verify VOC concentration is less than 1,000 ppmv through the procedure in Special Condition No. 33.

        (3) No standing liquid verified through visual inspection.

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

    C. Controlled degassing of the vapor space shall be completed as follows:

        (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. The locations and identifiers of vents, control device or controlled recovery system, and controlled exhaust stream shall be recorded. A vacuum or negative pressure in the vapor space shall be maintained during the 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 volume measurement 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. 33.

(4) The sampling point shall be upstream of the inlet to the control device or controlled recovery system. The sample ports and the collection system must be designed and operated such that there is no air leakage into the sample probe or the collection system downstream of the process equipment or vessel being purged.

(5) If ventilation is to be maintained with emission control, the VOC concentration shall be recorded once an hour.

Degassing must be performed every 24 hours unless there is no standing liquid in the tank or the VOC TVP of the remaining liquid in the tank is less than 0.15 psia.

D. For the purpose of estimating emissions, the date, time, and other information specified for each of the following events:

(1) start and completion of controlled degassing, and volumetric flow,

(2) all standing liquid was remove from the tank or any transfers of low VOC TVP 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 with the data and methods used to determine it.

36. 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 Nos. 33.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 Nos. 36.A through 36.D do not apply.

37. 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.

38. All permanent facilities authorized in this permit must comply with all operating requirements, limits, and representations in the permits as specified in the special conditions during planned startup and shutdown unless alternate requirements for emissions from routine emission points are identified below:

~~A. Combustion units, with the exception of flares, at this site are exempt from NO_x and CO operating requirements identified in special conditions in other NSR permits during planned startup and shutdown if the following criteria are satisfied.~~

~~(1) The maximum allowable emission rates in the permit authorizing the facility are not exceeded.~~

~~(2) The startup period does not exceed 42.5 hours in duration and the firing rate does not exceed 75 percent of the design firing rate. The time it takes to complete the shutdown does not exceed 33 hours.~~

(3) ~~Control devices are started and operating properly when venting a waste gas stream~~.

B. The refractory curing process shall not exceed 61 hours in duration.

C. A record shall be maintained indicating the start and end time of the refractory curing process identified above.

Date: February 18, 2020

Attachment A
Permit 9629

INHERENTLY LOW EMITTING ACTIVITIES

Activity	Emissions				
	VOC	NO_x	CO	SO_2	PM
Calibration of analytical equipment	x	x	x	x	
Quarterly Compressor testing	x				
Instrumentation/analyzer maintenance	x				

Date: February 18, 2020

Attachment B
Permit 9629

ROUTINE MAINTENANCE ACTIVITIES

Pump Inspection/Cleaning/Repair/Replacement

Fugitive component (valve, pipe, flange) Inspection/Cleaning/Repair/Replacement

Compressor Inspection/Cleaning/Repair/Replacement

Heat Exchanger Inspection/Cleaning/Repair/Replacement

Inline filter Inspection/Cleaning/Repair/Replacement

Date: February 18, 2020

Attachment C
Permit 9629

MSS ACTIVITY SUMMARY

Facilities	Description	Emissions Activity	EPN
~~Turbine EPN PG-14~~	~~Start-up and shutdown of turbine~~	~~vent to atmosphere~~	~~PG-14MSS~~
~~Vacuum Trucks~~	~~Remove liquids from storage tanks~~	~~vent to atmosphere~~	~~VAC-LOAD~~
~~Fixed Roof Storage Tanks~~	~~Storage Tank Draining and Degassing for cleaning and inspections~~	~~vent to atmosphere~~	~~TANK-DEGAS~~
Fixed Roof Storage Tanks	Storage Tank Draining and Degassing for cleaning and inspections	vent to control	INC-MAINT
~~Cogeneration units~~	~~Natural gas venting~~	~~vent to atmosphere~~	~~FUEL-VENT~~
~~Compressor Systems~~	~~Online water washing (desooting) activities~~	~~vent to atmosphere~~	~~ONLINE-WASH~~
~~Turbine EPN PG-14~~	~~Turbine lube demister venting~~	~~vent to atmosphere~~	~~OILMIST~~
Liquid process lines	Draining and Degassing for inspections and maintenance	vent to atmosphere	LINE-PURGE
Incinerator	Refractory Replacement and Curing	vent to atmosphere	REFR-REPL
see Attachment A	miscellaneous low emitting activities	see Attachment A	FUG-MAINT

Date: February 18, 2020

ATTACHMENT II

New Permit Proposed MAERT

Emission Sources - Maximum Allowable Emission Rates
Permit Number TBD

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)
INC-001	Incinerator Stack	NO_x	229.00	1003.00
		CO	143.87	63.70
		SO_2	10.00	43.80
		PM	8.60	37.60
		PM_{10}	8.60	37.60
		$PM_{2.5}$	8.60	37.60
		VOC	2.50	10.95
		HCl	10.00	43.80
		Lead	0.02	0.10
		Beryllium	<0.01	<0.01
		Mercury	<0.01	0.01
		Fluorides (HF)	0.67	2.95
		Sulfuric Acid Mist	0.54	2.35
		Reduced Sulfur (H_2S)	0.53	2.33
		Vinyl Chloride	0.17	0.75
		Asbestos	<0.01	<0.01
INC-002	Incinerator Area Fugitives (5)	VOC	2.20	9.64
INC-CT01	Incinerator Cooling Tower	PM	1.47	3.85
		PM_{10}	1.47	3.85
		$PM_{2.5}$	1.47	3.85
INC-FWD	Incinerator Front Wall Drum	PM	1.32	0.02
		PM_{10}	1.32	0.02
		$PM_{2.5}$	1.32	0.02
INC-LOAD	Incinerator Area Loading/Unloading	VOC	12.58	2.00
INC-SAMPLE	Incinerator Sampling	VOC	0.99	0.77
INC-SP	Incinerator Seal Pots	VOC	0.07	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)
INC-SCB	Incinerator Sample Bay Carbon Bed	VOC	1.50	0.35
INC-CSCB	Incinerator Container Storage Carbon Bed	VOC	3.01	0.69
INC-TFCB	Incinerator Tank Farm Carbon Bed	VOC	3.01	0.18
INC-REPAC	Incinerator Repackaging	VOC	3.48	1.34
MAINTENANCE START-UP, AND SHUTDOWN EMISSIONS				
INC-MAINT	Incinerator Maintenance	VOC	36.71	2.02
		PM	107.38	2.93
		PM_{10}	107.38	2.93
		$PM_{2.5}$	107.38	2.93
	The firing of natural gas auxiliary fuel during start-up period	NO_x	11.36	3.14
		CO	5.02	1.39
		VOC	0.33	0.09
		SO_2	<0.01	<0.01
	The firing of natural gas auxiliary fuel during shutdown period	NO_x	13.23	2.84
		CO	5.85	1.25
		VOC	0.38	0.08
		SO_2	<0.01	<0.01
INC-ASH	Incinerator Ash Management	PM	0.78	0.02
		PM_{10}	0.78	0.02
		$PM_{2.5}$	0.78	0.02
INC-SLAG	Incinerator Slag Management	PM	93.50	4.61
		PM_{10}	93.50	4.61
		$PM_{2.5}$	93.50	4.61

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
VAC-UNLOAD	Vacuum Unloading	VOC	2.05	0.58
FUG-MAINT	Fugitive Maintenance	VOC	0.12	0.80
LINE-PURGE	Liquid Line Purging	VOC	3.75	3.32
REFR-REPL	Refractory Replacement	NO_x	3.51	0.11
		CO	1.49	0.05
		SO_2	0.02	<0.01
		VOC	0.21	0.01
		PM	0.78	0.01
		PM_{10}	0.52	0.01
		$PM_{2.5}$	0.52	0.01
TANK-VENT	TANK-VENT	VOC	0.14	<0.01
INC-TRANS	INC-TRANS	VOC	0.03	<0.01
INC-ADD	INC-ADD	PM	0.09	0.01
		PM_{10}	0.09	0.01
		$PM_{2.5}$	0.09	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_x - total oxides of nitrogen
SO_2 - sulfur dioxide
PM - total particulate matter, suspended in the atmosphere, including PM_{10} and $PM_{2.5}$, as represented
PM_{10} - 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
(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: February 18, 2020

I. Applicant Information	
I acknowledge that I am submitting an authorized TCEQ application workbook and any necessary attachments. Except for inputting the requested data and adjusting row height and column width, I have not changed the TCEQ application workbook in any way, including but not limited to changing formulas, formatting, content, or protections.	I agree

A. Company Information

Company or Legal Name:	Performance Materials NA, Inc.

Permits are issued to either the facility owner or operator, commonly referred to as the applicant or permit holder. List the legal name of the company, corporation, partnership, or person who is applying for the permit. We will verify the legal name with the Texas Secretary of State at (512) 463-5555 or at:

https://www.sos.state.tx.us

Texas Secretary of State Charter/Registration Number (if given):	

B. Company Official Contact Information: must not be a consultant

Prefix (Mr., Ms., Dr., etc.):	Mr.
First Name:	David
Last Name:	Constant
Title:	Environmental Manager
Mailing Address:	P.O. Box 1089
Address Line 2:	
City:	Orange
State:	Texas
ZIP Code:	77631-1089
Telephone Number:	409-886-6580
Fax Number:	
Email Address:	David.Constant@dow.com

C. Technical Contact Information: This person must have the authority to make binding agreements and representations on behalf of the applicant and may be a consultant. **Additional technical contact(s) can be provided in a cover letter.**

Prefix (Mr., Ms., Dr., etc.):	Ms.
First Name:	Cheryl
Last Name:	Steves
Title:	Environmental Manager
Company or Legal Name:	Performance Materials NA, Inc.
Mailing Address:	332 SH332E
Address Line 2:	TXINN-APB
City:	Lake Jackson
State:	Texas
ZIP Code:	77566
Telephone Number:	979-238-5832
Fax Number:	
Email Address:	clsteves@dow.com

D. Assigned Numbers

The CN and RN below are assigned when a Core Data Form is initially submitted to the Central Registry. The RN is also assigned if the agency has conducted an investigation or if the agency has issued an enforcement action. If these numbers have not yet been assigned, leave these questions blank and include a Core Data Form with your application submittal. See Section VI.B. below for additional information.

Enter the CN. The CN is a unique number given to each business, governmental body, association, individual, or other entity that owns, operates, is responsible for, or is affiliated with a regulated entity.	CN605593805

Enter the RN. The RN is a unique agency assigned number given to each person, organization, place, or thing that is of environmental interest to us and where regulated activities will occur. The RN replaces existing air account numbers. The RN for portable units is assigned to the unit itself, and that same RN should be used when applying for authorization at a different location.	RN100542711

II. Delinquent Fees and Penalties	
Does the applicant have unpaid delinquent fees and/or penalties owed to the TCEQ? This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and Penalty Protocol. For more information regarding Delinquent Fees and Penalties, go to the TCEQ Web site at: https://www.tceq.texas.gov/agency/financial/fees/delin	No

III. Permit Information

A. Permit and Action Type (multiple may be selected, leave no blanks)

Additional information regarding the different NSR authorizations can be found at:
https://www.tceq.texas.gov/permitting/air/guidance/authorize.html

Select from the drop-down the type of action being requested for each permit type. **If that permit type does not apply, you MUST select "Not applicable".**

Provide all assigned permit numbers relevant for the project. Leave blank if the permit number has not yet been assigned.

Permit Type	**Action Type Requested (do not leave blank)**	**Permit Number (if assigned)**
Minor NSR (can be a Title V major source): *Not applicable, Initial, Amendment, Renewal, Renewal Certification, Renewal/Amendment, Relocation/Alteration, Change of Location, Alteration, Extension to Start of Construction*	Initial	
Special Permit: *Not applicable, Amendment, Renewal, Renewal Certification, Renewal/Amendment, Alteration, Extension to Start of Construction*	Not applicable	
De Minimis: *Not applicable, Initial*	Not applicable	
Flexible: *Not applicable, Initial, Amendment, Renewal, Renewal Certification, Renewal/Amendment, Alteration, Extension to Start of Construction*	Not applicable	
PSD: *Not applicable, Initial, Major Modification*	Not applicable	
Nonattainment: *Not applicable, Initial, Major Modification*	Not applicable	
HAP Major Source [FCAA § 112(g)]: *Not applicable, Initial, Major Modification*	Not applicable	
PAL: *Not applicable, Initial, Amendment, Renewal, Renewal/Amendment, Alteration*	Not applicable	
GHG PSD: *Not applicable, Initial, Major Modification, Voluntary Update*	Not applicable	

B. MSS Activities	
How are/will MSS activities for sources associated with this project be authorized?	Combination (list below)
List the permit number, registration number, and/or PBR number.	106.263 and previously NSR 9629
C. Consolidating NSR Permits	
Will this permit be consolidated into another NSR permit with this action?	No
Will NSR permits be consolidated into this permit with this action?	No
D. Incorporation of Standard Permits, Standard Exemptions, and/or Permits By Rule (PBR)	
To ensure protectiveness, previously issued authorizations (standard permits, standard exemptions, or PBRs) including those for MSS, are incorporated into a permit either by consolidation or by reference. At the time of renewal and/or amendment, consolidation (in some cases) may be voluntary and referencing is mandatory. More guidance regarding incorporation can be found in 30 TAC § 116.116(d)(2), 30 TAC § 116.615(3) and in this memo: https://www.tceq.texas.gov/assets/public/permitting/air/memos/pbr_spc06.pdf	
Are there any standard permits, standard exemptions, or PBRs to be incorporated by reference?	No
Are there any PBR, standard exemptions, or standard permits associated to be incorporated by consolidation? **Note:** Emission calculations, a BACT analysis, and an impacts analysis must be attached to this application at the time of submittal for any authorization to be incorporated by consolidation.	No
E. Associated Federal Operating Permits	
Is this facility located at a site required to obtain a **site operating permit (SOP)** or **general operating permit (GOP)?**	Yes
Is a **SOP** or **GOP** review pending for this source, area, or site?	No

If required to obtain a **SOP** or **GOP**, list all associated permit number(s). If no associated permit number has been assigned yet, enter "TBD":	O1896

IV. Facility Location and General Information	
A. Location	
County: Enter the county where the facility is physically located.	Orange
TCEQ Region	Region 10
County attainment status as of Sept. 23, 2019	attainment or unclassified for all pollutants
Street Address:	3055 FM 1006
City: If the address is not located in a city, then enter the city or town closest to the facility, even if it is not in the same county as the facility.	Orange
ZIP Code: Include the ZIP Code of the physical facility site, not the ZIP Code of the applicant's mailing address.	77631-1089
Site Location Description: If there is no street address, provide written driving directions to the site. Identify the location by distance and direction from well-known landmarks such as major highway intersections.	
Use USGS maps, county maps prepared by the Texas Department of Transportation, or an online software application such as Google Earth to find the latitude and longitude.	
Latitude (in degrees, minutes, and nearest second (DDD:MM:SS)) for the street address or the destination point of the driving directions. Latitude is the angular distance of a location north of the equator and will always be between 25 and 37 degrees north (N) in Texas.	030:03:22
Longitude (in degrees, minutes, and nearest second (DDD:MM:SS)) for the street address or the destination point of the driving directions. Longitude is the angular distance of a location west of the prime meridian and will always be between 93 and 107 degrees west (W) in Texas.	093:45:14
Is this a project for a lead smelter, concrete crushing facility, and/or a hazardous waste management facility?	No
B. General Information	
Site Name:	Sabine River Operations
Area Name: Must indicate the general type of operation, process, equipment or facility. Include numerical designations, if appropriate. Examples are Sulfuric Acid Plant and No. 5 Steam Boiler. Vague names such as Chemical Plant are not acceptable.	Hazardous Waste Incinerator
Are there any schools located within 3,000 feet of the site boundary?	No
C. Portable Facility	
Permanent or portable facility?	Permanent
D. Industry Type	
Principal Company Product/Business:	Hazardous Waste Treatment and Disposal

A list of SIC codes can be found at: https://www.naics.com/sic-codes-industry-drilldown/	
Principal SIC code:	4953
NAICS codes and conversions between NAICS and SIC Codes are available at: https://www.census.gov/eos/www/naics/	
Principal NAICS code:	562211

E. State Senator and Representative for this site

This information can be found at (note, the website is not compatible to Internet Explorer): https://wrm.capitol.texas.gov/	
State Senator:	Robert Nichols
District:	3
State Representative:	Dade Phelan
District:	21

V. Project Information

A. Description

Provide a brief description of the project that is requested. (Limited to 500 characters).	Initial permit to transfer emission sources/emission points associated with the hazardous waste incinerator into a new, stand-alone permit. The incinerator is currently authorized in NSR 9629 with a cogeneration unit. This is the second of the required two permit applications; a subsequent amendment application is being submitted to remove the sources from NSR 9629

B. Project Timing

Authorization must be obtained for many projects before beginning construction. Construction is broadly interpreted as anything other than site clearance or site preparation. Enter the date as "Month Date, Year" (e.g. July 4, 1776).

Projected Start of Construction:	none - no construction
Projected Start of Operation:	none - no changes requested

C. Enforcement Projects

Is this application in response to, or related to, an agency investigation, notice of violation, or enforcement action?	No

D. Operating Schedule

Will sources in this project be authorized to operate 8760 hours per year?	Yes

VI. Application Materials

All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. (30 TAC § 116.116)

A. Confidential Application Materials

Is confidential information submitted with this application?	No

B. Is the Core Data Form (Form 10400) attached? No

https://www.tceq.texas.gov/assets/public/permitting/centralregistry/10400.docx

C. Is a current area map attached?	N/A
D. Is a plot plan attached?	N/A
E. Is a process flow diagram attached?	N/A
F. Is a process description attached?	N/A
G. Are detailed calculations attached? Calculations must be provided for each source with new or changing emission rates. For example, a new source, changing emission factors, decreasing emissions, consolidated sources, etc. You do not need to submit calculations for sources which are not changing emission rates with this project. Please note: the preferred format is an electronic workbook (such as Excel) with all formulas viewable for review. It can be emailed with the submittal of this application workbook.	N/A
H. Is a material balance (Table 2, Form 10155) attached?	N/A
I. Is a list of MSS activities attached?	N/A
J. Is a discussion of state regulatory requirements attached, addressing 30 TAC Chapters 101, 111, 112, 113, 115, and 117?	N/A
K. Are all other required tables, calculations, and descriptions attached?	N/A

VII. Signature	
The owner or operator of the facility must apply for authority to construct. The appropriate company official (owner, plant manager, president, vice president, or environmental director) must sign all copies of the application. The applicant's consultant cannot sign the application. **Important Note: Signatures must be original in ink, not reproduced by photocopy, fax, or other means, and must be received before any permit is issued.**	
The signature below confirms that I have knowledge of the facts included in this application and that these facts are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which application is made will not in any way violate any provision of the Texas Water Code (TWC), Chapter 7; the Texas Health and Safety Code, Chapter 382; the Texas Clean Air Act (TCAA); the air quality rules of the Texas Commission on Environmental Quality; or any local governmental ordinance or resolution enacted pursuant to the TCAA. I further state that I understand my signature indicates that this application meets all applicable nonattainment, prevention of significant deterioration, or major source of hazardous air pollutant permitting requirements. The signature further signifies awareness that intentionally or knowingly making or causing to be made false material statements or representations in the application is a criminal offense subject to criminal penalties.	
Name:	Cheryl Steves
Signature:	
Original signature is required.	
Date:	

I. Additional Questions for Specific NSR Minor Permit Actions

E. Concrete Batch Plants

Is this a project for a concrete batch plant?	No

VIII. Federal Regulatory Questions	
Indicate if any of the following requirements apply to the proposed facility. Note that some federal regulations apply to minor sources. Enter all applicable Subparts.	
A. Title 40 CFR Part 60	
Do NSPS subpart(s) apply to a facility in this application?	Yes
List applicable subparts you will demonstrate compliance with (e.g. Subpart M)	Subpart A
B. Title 40 CFR Part 61	
Do NESHAP subpart(s) apply to a facility in this application?	Yes
List applicable subparts you will demonstrate compliance with (e.g. Subpart BB)	Subparts A, C, E, F, M, V, FF
C. Title 40 CFR Part 63	
Do MACT subpart(s) apply to a facility in this application?	Yes

List applicable subparts you will demonstrate compliance with (e.g. Subpart VVVV)	Subparts A, DD, EEE

IX. Emissions Review

A. Impacts Analysis

Any change that results in an increase in off-property concentrations of air contaminants requires an air quality impacts demonstration. Information regarding the air quality impacts demonstration must be provided with the application and show compliance with all state and federal requirements. Detailed requirements for the information necessary to make the demonstration are listed on the Impacts sheet of this workbook.

Does this project require an impacts analysis?	No

B. Disaster Review

If the proposed facility will handle sufficient quantities of certain chemicals which, if released accidentally, would cause off-property impacts that could be immediately dangerous to life and health, a disaster review analysis may be required as part of the application. Contact the appropriate NSR permitting section for assistance at (512) 239-1250. Additional Guidance can be found at:

https://www.tceq.texas.gov/assets/public/permitting/air/Guidance/NewSourceReview/disrev-factsheet.pdf

Does this application involve any air contaminants for which a disaster review is required?	No

C. Air Pollutant Watch List

Certain areas of the state have concentrations of specific pollutants that are of concern. The TCEQ has designated these portions of the state as watch list areas. Location of a facility in a watch list area could result in additional restrictions on emissions of the affected air pollutant(s) or additional permit requirements. The location of the areas and pollutants of interest can be found at:

https://www.tceq.texas.gov/toxicology/apwl/apwl.html

Is the proposed facility located in a watch list area?	No

D. Mass Emissions Cap and Trade

Is this facility located at a site within the Houston/Galveston nonattainment area (Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, and Waller Counties)?	No

Texas Commission on Environmental Quality
Form PI-1 General Application
Unit Types - Emission Rates

Date: April 2, 2020
Permit #: 160845
Company: Performance Materials NA, Inc.

Permit primary industry (must be selected for workbook to function)	Combustion

Action Requested (only 1 action per FIN)	Include these emissions in annual (tpy) summary?	Facility ID Number (FIN)	Emission Point Number (EPN)	Source Name	Pollutant	Current Short-Term (lb/hr)	Current Long-Term (tpy)	Consolidated Current Short-Term (lb/hr)	Consolidated Current Long-Term (tpy)	Proposed Short-Term (lb/hr)	Proposed Long-Term (tpy)	Short-Term Difference (lb/hr)	Long-Term Difference (tpy)	Unit Type (Used for reviewing BACT and Monitoring Requirements)	Unit Type Notes (only if "other" unit type in Column O)
Not New/Modified	No		INC-001	Incinerator stack	NOx	229	1003			229	1003	0	0	Incinerator: Hazardous Waste	
					CO	143.87	63.7			143.87	63.7	0	0		
					SO2	10	43.8			10	43.8	0	0		
					PM	8.6	37.6			8.6	37.6	0	0		
					PM10	8.6	37.6			8.6	37.6	0	0		
					PM2.5	8.6	37.6			8.6	37.6	0	0		
					VOC	2.5	10.95			2.5	10.95	0	0		
					HCl	10	43.8			10	43.8	0	0		
					Pb	0.02	0.1			0.02	0.1	0	0		
					Beryllium	<0.01	<0.01			<0.01	<0.01	0	0		
					Mercury	<0.01	0.01			<0.01	0.01	0	0		
					Fluorides (HF)	0.67	2.95			0.67	2.95	0	0		
					Sulfuric Acid Mist	0.54	2.35			0.54	2.35	0	0		
					Reduced Sulfur (H2S)	0.53	2.33			0.53	2.33	0	0		
					Vinyl chloride	0.17	0.75			0.17	0.75	0	0		
					Asbestos	<0.01	<0.01			<0.01	<0.01	0	0		
Not New/Modified	No		INC-002	Incinerator area fugitives	VOC	2.2	9.64			2.2	9.64	0	0	Fugitives: Piping and Equipment Leak	
Not New/Modified	No		INC-CT01	Incinerator cooling tower	PM	1.47	3.85			1.47	3.85	0	0	Cooling Tower	
					PM10	1.47	3.85			1.47	3.85	0	0		
					PM2.5	1.47	3.85			1.47	3.85	0	0		
Not New/Modified	No		INC-FWD	Incinerator front wall drum	PM	1.32	0.02			1.32	0.02	0	0	Other	
					PM10	1.32	0.02			1.32	0.02	0	0		
					PM2.5	1.32	0.02			1.32	0.02	0	0		
Not New/Modified	No		INC-LOAD	Incinerator Area Loading/Unloading	VOC	12.58	2			12.58	2	0	0	Other	
Not New/Modified	No		INC-SAMPLE	Incinerator sampling	VOC	0.99	0.77			0.99	0.77	0	0	Other	
Not New/Modified	No		INC-SP	Incinerator seal pots	VOC	0.07	0.01			0.07	0.01	0	0	Other	
Not New/Modified	No		INC-SCB	Incinerator sample bay carbon bed	VOC	1.5	0.35			1.5	0.35	0	0	Other	
Not New/Modified	No		INC-CSCB	Incinerator container storage carbon bed	VOC	3.01	0.69			3.01	0.69	0	0	Other	
Not New/Modified	No		INC-TFCB	Incinerator tank farm carbon bed	VOC	3.01	0.18			3.01	0.18	0	0	Other	
Not New/Modified	No		INC-REPAC	Incinerator repackaging	VOC	3.48	1.34			3.48	1.34	0	0	Other	
Not New/Modified	No		INC-MAINT	Incinerator maintenance	VOC	36.71	2.02			36.71	2.02	0	0	Other	
					PM	107.38	2.93			107.38	2.93	0	0		
					PM10	107.38	2.93			107.38	2.93	0	0		
					PM2.5	107.38	2.93			107.38	2.93	0	0		
				The firing of natural gas auxiliary fuel during startup period	NOx	11.36	3.14			11.36	3.14	0	0	Other	
					CO	5.02	1.39			5.02	1.39	0	0		
					VOC	0.33	0.09			0.33	0.09	0	0		
					SO2	<0.01	<0.01			<0.01	<0.01	0	0		
				The firing of natural gas auxiliary fuel during shutdown period	NOX	13.23	2.84			13.23	2.84	0	0	Other	
					CO	5.85	1.25			5.85	1.25	0	0		
					VOC	0.38	0.08			0.38	0.08	0	0		
					SO2	<0.01	<0.01			<0.01	<0.01	0	0		
Not New/Modified	No		INC-ASH	Incinerator ash management	PM	0.78	0.02			0.78	0.02	0	0	Other	
					PM10	0.78	0.02			0.78	0.02	0	0		
					PM2.5	0.78	0.02			0.78	0.02	0	0		
Not New/Modified	No		INC-SLAG	Incinerator slag management	PM	93.5	4.61			93.5	4.61	0	0	Other	
					PM10	93.5	4.61			93.5	4.61	0	0		
					PM2.5	93.5	4.61			93.5	4.61	0	0		
Not New/Modified	No		VAC-UNLOAD	Vacuum unloading	VOC	2.05	0.58			2.05	0.58	0	0	Other	
Not New/Modified	No		REFR-REPL	Refractory replacement	NOx	3.51	0.11			3.51	0.11	0	0	Other	
					CO	1.49	0.05			1.49	0.05	0	0		
					SO2	0.02	<0.01			0.02	<0.01	0	0		
					VOC	0.21	0.01			0.21	0.01	0	0		
					PM	0.78	0.01			0.78	0.01	0	0		
					PM10	0.52	0.01			0.52	0.01	0	0		
					PM2.5	0.52	0.01			0.52	0.01	0	0		
					VOC	0.21	0.01			0.21	0.01	0	0		
Not New/Modified	No		TANK-VENT	TANK-VENT	VOC	0.14	<0.01			0.14	<0.01	0	0		
Not New/Modified	No		INC-TRANS	INC-TRANS	VOC	0.03	<0.01			0.03	<0.01	0	0		
Not New/Modified	No		INC-ADD	INC-ADD	PM	0.09	0.01			0.09	0.01	0	0		
					PM10	0.09	0.01			0.09	0.01	0	0		
					PM2.5	0.09	0.01			0.09	0.01	0	0		
												0	0		
												0	0		
												0	0		
												0	0		

Texas Commission on Environmental Quality
Form PI-1 General Application
Stack Parameters

Date: April 2, 2020
Permit #: 160845
Company: Performance Materials NA, Inc.

Emission Point Discharge Parameters												
EPN	Included in EMEW?	UTM Coordinates Zone	East (Meters)	North (Meters)	Building Height (ft)	Height Above Ground (ft)	Stack Exit Diameter (ft)	Velocity (FPS)	Temperature (°F)	Fugitives - Length (ft)	Fugitives - Width (ft)	Fugitives - Axis Degrees
INC-001	No	15	427240	3325062		175	4	106.1	160			
INC-002	No	15	427243	3324975						267	139	60.2
INC-CT01	No	15	427223	3325033		20	12.4					
INC-FWD	No	15	427143	3325014						35	25	60.2
INC-LOAD	No	15	427221	0324925						98.12	57.24	60.2
INC-SAMPLE	No	15	427197	3324955						23.3	70	60.2
INC-SP	No	15	427265	3324956		2	1.2	TBD	Ambient			
INC-SCB	No	15	427223	3324916		32	0.67	28	Ambient			
INC-CSCB	No	15	427157	3324951		30	0.5	35	Ambient			
INC-TFCB	No	15	427231	3324946		30	0.67	2.5	Ambient			
INC-REPAC	No	15	427185	3324920						76.72	73.52	60.2
INC-MAINT	No	15	427146	3325025						293	300	60.2
The firing of natural gas auxiliary fuel during startup period	No	15	427146	3325025	40	75	18	55	340			
The firing of natural gas auxiliary fuel during shutdown period	No	15	427146	3325025	40	75	18	55	340			
INC-ASH	No	15	427218	3324997						51.58	31.08	60.2
INC-SLAG	No	15	427194	3324982						26.8	23.5	60.2
VAC-UNLOAD	No	15										
REFR-REPL	No	15	427144	3325025						100	297	60.2
TANK-VENT	No	15	427201	3324992						80	15.95	59.7
INC-TRANS	No	15	426845	3324683						267	139	60.2
INC-ADD	No	15	427198	3324956						23.3	70	60.2

I. Public Notice Applicability	
A. Application Type	
Is this an application for an initial permit?	Yes
B. Project Increases and Public Notice Thresholds (for Initial and Amendment Projects)	

Pollutant			**Proposed Long-Term (tpy)**			
VOC			0.00			
PM			0.00			
PM_{10}			0.00			
$PM_{2.5}$			0.00			
NO_x			0.00			
CO			0.00			
SO_2			0.00			
Pb			0.00			
HCl			0			
Beryllium			0			
Mercury			0			
Fluorides (HF)			0			
Sulfuric Acid Mist			0			
Reduced Sulfur (H2S)			0			
Vinyl chloride			0			
Asbestos			0			

* Notice is required for PM, PM10, and PM2.5 if one of these pollutants is above the threshold.

** Notice of a GHG action is determined by action type. Initial and major modification always require notice. Voluntary updates require a consolidated notice if there is a change to BACT. Project emission increases of CO2e (CO2 equivalent) are not relevant for determining public notice of GHG permit actions.

C. Is public notice required for this project as represented in this workbook? If no, proceed to Section III Small Business Classification. Note: public notice applicability for this project may change throughout the technical review.	Yes
D. Are any HAPs to be authorized/re-authorized with this project? The category "HAPs" must be specifically listed in the public notice if the project authorizes (reauthorizes for renewals) any HAP pollutants.	Yes

II. Public Notice Information

Complete this section if public notice is required (determined in the above section) or if you are not sure if public notice is required.

A. Contact Information

Enter the contact information for the **person responsible for publishing.** This is a designated representative who is responsible for ensuring public notice is properly published in the appropriate newspaper and signs are posted at the facility site. This person will be contacted directly when the TCEQ is ready to authorize public notice for the application.

Prefix (Mr., Ms., Dr., etc.):	Mr.
First Name:	David
Last Name:	Constant
Title:	Environmental Manager
Company Name:	Performance Materials NA, Inc.
Mailing Address:	P.O. Box 1089
Address Line 2:	

City:	Orange
State:	TX
ZIP Code:	77631-1089
Telephone Number:	409-886-6580
Fax Number:	
Email Address:	David.Constant@dow.com

Enter the contact information for the **Technical Contact.** This is the designated representative who will be listed in the public notice as a contact for additional information.

Prefix (Mr., Ms., Dr., etc.):	Ms.
First Name:	Cheryl
Last Name:	Steves
Title:	Environmental Manager
Company Name:	Dow Chemical
Mailing Address:	332 SH 332E, APB1B1
Address Line 2:	
City:	Lake Jackson
State:	TX
ZIP Code:	77566
Telephone Number:	979-238-5832
Fax Number:	
Email Address:	clsteves@dow.com

B. Public place

Place a copy of the full application (including all of this workbook and all attachments) at a public place in the county where the facilities are or will be located. You must state where in the county the application will be available for public review and comment. The location must be a public place and described in the notice. A public place is a location which is owned and operated by public funds (such as libraries, county courthouses, city halls) and cannot be a commercial enterprise. You are required to pre-arrange this availability with the public place indicated below. The application must remain available from the first day of publication through the designated comment period.

If this is an application for a PSD, nonattainment, or FCAA §112(g) permit, the public place must have internet access available for the public as required in 30 TAC § 39.411(f)(3).

If the application is submitted to the agency with information marked as Confidential, you are required to indicate which specific portions of the application are not being made available to the public. These portions of the application must be accompanied with the following statement: ***Any request for portions of this application that are marked as confidential must be submitted in writing, pursuant to the Public Information Act, to the TCEQ Public Information Coordinator, MC 197, P.O. Box 13087, Austin, Texas 78711-3087.***

Name of Public Place:	
Physical Address:	
Address Line 2:	www.dow.com/TX-permits
City:	
ZIP Code:	
County:	

Has the public place granted authorization to place the application for public viewing and copying?	Yes

C. Alternate Language Publication

In some cases, public notice in an alternate language is required. If an elementary or middle school nearest to the facility is in a school district required by the Texas Education Code to have a bilingual program, a bilingual notice will be required. If there is no bilingual program required in the school nearest the facility, but children who would normally attend those schools are eligible to attend bilingual programs elsewhere in the school district, the bilingual notice will also be required. If it is determined that alternate language notice is required, you are responsible for ensuring that the publication in the alternate language is complete and accurate in that language.

Is a bilingual program required by the Texas Education Code in the School District?	Yes
Are the children who attend either the elementary school or the middle school closest to your facility eligible to be enrolled in a bilingual program provided by the district?	Yes
If yes to either question above, list which language(s) are required by the bilingual program?	Spanish

III. Small Business Classification	
Complete this section to determine small business classification. If a small business requests a permit, agency rules (30 TAC § 39.603(f)(1)(A)) allow for alternative public notification requirements if all of the following criteria are met. If these requirements are met, public notice does not have to include publication of the prominent (12 square inch) newspaper notice.	
Does the company (including parent companies and subsidiary companies) have fewer than 100 employees or less than $6 million in annual gross receipts?	No
Small business classification:	**No**

Texas Commission on Environmental Quality
Form PI-1 General Application
Federal Applicability

Date: April 2, 2020
Permit #: 160845
Company: Performance Materials NA, Inc.

I. County Classification	
Does the project require retrospective review?	
If so, what is the issuance date of the project being revisited? (xx/xx/xx)	
If so, select the nonattainment classification of the county when the project being revisited was authorized.	
The workbook includes one retrospective review. If the project includes multiple, provide an attachment listing the additional issuance dates, classifications at the time of authorization, and offset data for each additional retrospective review in the project.	
County (completed for you from your response on the General sheet)	Orange
This project will be located in an area that is in attainment for ozone as of Sept. 23, 2019. Select from the drop-down list to the right if you would like the project to be reviewed under a different classification.	
Determination:	**This project will be located in an area that is in attainment or unclassified for all pollutants. Nonattainment review is not required.**

II. PSD and GHG PSD Applicability Summary			
Is netting required for the PSD analysis for this project?			**No**
Pollutant	**Project Increase**	**Threshold**	**PSD Review Required?**
CO	0	100	No
NO_x	0	40	No
PM	0	25	No
PM_{10}	0	15	No
$PM_{2.5}$	0	10	No
SO_2	0	40	No
Ozone (as VOC)	0	40	No
Ozone (as NOx)	0	40	No
Pb	0	0.6	No
H_2S	0	10	No
TRS	0	10	No
Reduced sulfur compounds (including H_2S)	0	10	No
H_2SO_4	0	7	No
Fluoride (excluding HF)	0	3	No
CO2e	0	75000	No

Texas Commission on Environmental Quality
Form PI-1 General Application
Fees

Date: April 2, 2020
Permit #: 160845
Company: Performance Materials NA, Inc.

I. General Information - Non-Renewal	
Is this project for new facilities controlled and operated directly by the federal government? (30 TAC § 116.141(b)(1) and 30 TAC § 116.163(a))	No
A fee of $75,000 shall be required if no estimate of capital project cost is included with the permit application. (30 TAC § 116.141(d)) Select "yes" here to use this option. Then skip sections II and III.	No
Select Application Type	Minor Application

II. Direct Costs - Non-Renewal	
Type of Cost	**Amount**
Process and control equipment not previously owned by the applicant and not currently authorized under this chapter.	$0.00
Auxiliary equipment, including exhaust hoods, ducting, fans, pumps, piping, conveyors, stacks, storage tanks, waste disposal facilities, and air pollution control equipment specifically needed to meet permit and regulation requirements.	$0.00
Freight charges.	$0.00
Site preparation, including demolition, construction of fences, outdoor lighting, road, and parking areas.	$0.00
Installation, including foundations, erection of supporting structures, enclosures or weather protection, insulation and painting, utilities and connections, process integration, and process control equipment.	$0.00
Auxiliary buildings, including materials storage, employee facilities, and changes to existing structures.	$0.00
Ambient air monitoring network.	$0.00
Sub-Total:	$0.00

III. Indirect Costs - Non-Renewal	
Type of Cost	**Amount**
Final engineering design and supervision, and administrative overhead.	$0.00
Construction expense, including construction liaison, securing local building permits, insurance, temporary construction facilities, and construction clean-up.	$0.00
Contractor's fee and overhead.	$0.00
Sub-Total:	$0.00

IV. Calculations - Non-Renewal
For GHG permits: A single PSD fee (calculated on the capital cost of the project per 30 TAC § 116.163) will be required for all of the associated permitting actions for a GHG PSD project. Other NSR permit fees related to the project that have already been remitted to the TCEQ can be subtracted when determining the appropriate fee to submit with the GHG PSD application. Identify these other fees in the GHG PSD permit application.

In signing the "General" sheet with this fee worksheet attached, I certify that the total estimated capital cost of the project as defined in 30 TAC §116.141 is equal to or less than the above figure. I further state that I have read and understand Texas Water Code § 7.179, which defines Criminal Offenses for certain violations, including intentionally or knowingly making, or causing to be made, false material statements or representations.

Estimated Capital Cost	Minor Application Fee	
Less than $300,000	$900 (minimum fee)	
$300,000 - $7,500,000	N/A	
$300,000 - $25,000,000	0.30% of capital cost	
Greater than $7,500,000	N/A	
Greater than $25,000,000	$75,000 (maximum fee)	

Your estimated capital cost:	**$0.00**	Minimum fee applies.
Permit Application Fee:		**$900.00**

VI. Total Fees

Note: fees can be paid together with one payment or as two separate payments.

Non-Renewal Fee	$900.00
Total	$900.00

VII. Payment Information

A. Payment One (required)

Was the fee paid online?	Yes
Enter the fee amount:	$ 900.00
Enter the check, money order, ePay Voucher, or other transaction number:	n/a
Enter the Company name as it appears on the check:	n/a - fee submitted via ePay

C. Total Paid	**$900.00**

VIII. Professional Engineer Seal Requirement	
Is the estimated capital cost of the project above $2 million?	No
Is the application required to be submitted under the seal of a Texas licensed P.E.? Note: an electronic PE seal is acceptable.	No

Texas Commission on Environmental Quality
Form PI-1 General Application
Materials

Date: April 2, 2020
Permit #: 160845
Company: Performance Materials NA, Inc.

Item	How submitted	Date submitted
A. Administrative Information		
Form PI-1 General Application	STEERS	04/02/2020
Hard copy of the General sheet with original (ink) signature	Not applicable	
Professional Engineer Seal	Not applicable	
B. General Information		
Copy of current permit (both Special Conditions and MAERT)		
Core Data Form		
Area map		
Plot plan		
Process description		
Process flow diagram		
List of MSS activities		
State regulatory requirements discussion	Not applicable	
C. Federal Applicability		
Summary and project emission increase determination - Tables 1F and 2F	Not applicable	
Netting analysis (if required) - Tables 3F and 4F as needed	Not applicable	
D. Technical Information		
BACT discussion, if additional details are attached	Not applicable	
Monitoring information, if additional details are attached	Not applicable	
Material Balance (if applicable)		
Calculations		
E. Impacts Analysis		
Qualitative impacts analysis	Not applicable	
MERA analysis	Not applicable	
Electronic Modeling Evaluation Workbook: SCREEN3	Not applicable	
Electronic Modeling Evaluation Workbook: NonSCREEN3	Not applicable	
PSD modeling protocol	Not applicable	
F. Additional Attachments		
HW_Incinerator_NewPermit 04-01-2020.pdf	STEERS	04/02/2020
New_Permit_proposed_COND.docx	STEERS	04/02/2020
New_Permit_proposed_MAERT.docx	STEERS	04/02/2020