

SPECIAL CONDITIONS

Permit Number 19296

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

Federal Applicability

2. This facility shall comply with all applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations:
 - A. In Standards of Performance for New Stationary Sources, Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), promulgated for Equipment Leaks of volatile organic compounds (VOC) in the Synthetic Organic Chemicals Manufacturing Industry and Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations, Subparts A, VV and NNN.
 - B. In the Consolidated Federal Air Rule, 40 CFR Part 65, promulgated for Process Vents and Closed Vent Systems, Control Devices, and Routing to a Fuel Gas System or a Process, Subparts A, D and G.

Emission Standards and Operating Specifications

3. The permit holder shall install and operate a totalizing fuel flow meter to measure the gas fuel usage for each process combustion unit and fuel usage for each shall be recorded monthly. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or at least annually, whichever is more frequent, and shall be accurate to within 5 percent. The measurements missed shall be estimated using engineering judgment and the methods used recorded.
4. Fuel for combustion units at the site shall be limited to pipeline-quality, sweet natural gas containing no more than 0.05 grain total sulfur per dry standard cubic feet. A copy of specifications for the purchased natural gas shall be kept on-site. Upon request by the Executive Director of the Texas Commission on Environmental Quality (TCEQ), the holder of this permit shall provide a sample and/or analysis of the fuel used at the site.

Boilers

5. Boilers Nos. 1, 2 and 3, Emission Point Numbers (EPNs) 3, BLR-21 and BLR-22, shall meet the following requirements:
 - A. Boiler No. 1 shall be limited to an hourly maximum firing rate of 95 MMBtu and Boiler Nos. 2 and 3 shall be limited to a maximum hourly firing rate of 81 MMBtu each, based on the higher heating value (HHV) of the fuel. Total annual firing for Boilers 1, 2, and 3 combined shall be limited to 1,200,000 MMBtu/yr.
 - B. Opacity of emissions from Boiler Nos. 1, 2, and 3 shall not exceed 5 percent averaged over a six-minute period, except during startup and shutdown.

- C. Boiler Nos. 2 and 3 shall not exceed:
- (1) 0.035 lb. NO_x/MMBtu on an hourly average;
 - (2) 100 ppmvd CO corrected to 3 percent oxygen on an hourly average.

Cooling Tower System

6. The VOCs associated with cooling tower water shall be monitored monthly with an approved air stripping system or equivalent; such as total organic carbon water analyses on the cooling tower water return line. The appropriate equipment shall be maintained so as to minimize fugitive VOC emissions from the cooling tower. Faulty equipment shall be repaired at the earliest opportunity, but no later than the next scheduled shutdown of the process unit in which the leak occurs. The results of the monitoring and maintenance efforts shall be recorded.
7. The cooling tower, EPN 7, shall be operated and monitored in accordance with the following:
- A. The cooling tower shall maintain drift eliminators having manufacturer's design assurance of 0.005% drift or less. Drifts eliminators shall be maintained and inspected during plant turnarounds and conduct an annual external visual inspection. The permit holder shall maintain records of all inspections and repairs.
 - B. Total dissolved solids (TDS) shall not exceed 5500 parts per million by weight (ppmw). Dissolved solids in the cooling water drift are considered to be emitted as PM, PM₁₀, and PM_{2.5} as represented in the permit application calculations.
 - C. Cooling towers shall be analyzed for particulate emissions using one of the following methods:
 - (1) Cooling water shall be sampled at least once per day for total dissolved solids (TDS); or
 - (2) TDS monitoring may be reduced to weekly if conductivity is monitored daily and TDS is calculated using a ratio of TDS-to-conductivity (in ppmw per μ mho/cm or ppmw/siemens). The ratio of TDS-to-conductivity shall be determined by concurrently monitoring TDS and conductivity on a weekly basis. The permit holder may use the average of two consecutive TDS-to-conductivity ratios to calculate daily TDS; or
 - (3) TDS monitoring may be reduced to quarterly if conductivity is monitored daily and TDS is calculated using a correlation factor established for each cooling tower. The correlation factor shall be the average of nine consecutive weekly TDS-to-conductivity ratios determined using C(2) above provided the highest ratio is not more than 10% larger than the smallest ratio.
 - (4) The permit holder shall validate the TDS-to-conductivity correlation factor once each calendar quarter. If the ratio of concurrently sampled TDS and conductivity is more than 10% higher or lower than the established factor, the permit holder shall increase TDS monitoring to weekly until a new correlation factor can be established.
 - D. Cooling water sampling shall be representative of the cooling tower feed water and shall be conducted using approved methods.

- (1) The analysis method for TDS shall be EPA Method 160.1, ASTM D5907, and SM 2540 C [SM - 19th edition of Standard Methods for Examination of Water]. Water samples should be capped upon collection, and transferred to a laboratory area for analysis.
 - (2) The analysis method for conductivity shall be ASTM D1125-14 Test Method A (field or routine laboratory testing), ASTM D1125-14 Test Method B (continuous monitor), EPA Method 2510-B, EPA Method 120.1 or Method 8160. The analysis may be conducted at the sample site or with a calibrated process conductivity meter. If a conductivity meter is used, it shall be calibrated at least annually. Documentation of the method and any associated calibration records shall be maintained.
 - (3) Alternate sampling and analysis methods may be used to comply with D(1) and D(2) with written approval from the TCEQ Regional Director.
 - (4) Records of all instrument calibrations and test results and process measurements used for the emission calculations shall be retained.
- E. Emission rates of PM, PM10 and PM2.5 shall be calculated using the measured TDS and the ratio or correlation of TDS to conductivity measurements, the design drift rate and the daily maximum and average actual cooling water circulation rate for the short term and annual average rates. Alternately, the design maximum circulation rate may be used for all calculations. Emission records shall be updated monthly.

Flare

8. The flare, EPN 5, shall be designed and operated in accordance with the following requirements:
 - A. The flare systems shall be designed such that the combined assist natural gas and waste stream to each flare meets the 40 CFR § 60.18 specifications of minimum heating value and maximum tip velocity under normal and maintenance flow conditions.

The heating value and velocity requirements shall be satisfied during operations authorized by this permit. Flare testing per 40 CFR § 60.18(f) may be requested by the appropriate regional office to demonstrate compliance with these requirements.
 - B. The flare shall be operated with a flame present at all times and/or have a constant pilot flame. The pilot flame shall be continuously monitored by a thermocouple or an infrared monitor. The time, date, and duration of any loss of pilot flame shall be recorded. Each monitoring device shall be accurate to, and shall be calibrated at a frequency in accordance with, the manufacturer's specifications.
 - C. The flare shall be operated with no visible emissions except periods not to exceed a total of five minutes during any two consecutive hours. This shall be ensured by the use of air assist to the flare.
 - D. The permit holder shall install a continuous flow monitor and composition analyzer that provide a record of the vent stream flow, composition and Btu content to the flare. The flow monitor sensor and analyzer sample points shall be installed in the vent stream as near as possible to the flare inlet such that the total vent stream to the flare is measured and

analyzed. Readings shall be taken at least once every 15 minutes and the average hourly values of the flow and composition shall be recorded each hour.

The monitors shall be calibrated on an annual basis to meet the following accuracy specifications: the flow monitor shall be ± 5.0 percent, temperature monitor shall be ± 2.0 percent at absolute temperature, and pressure monitor shall be ± 5.0 mm Hg.

The monitors and analyzers shall operate as required by this section at least 95 percent of the time when the flare is operational, averaged over a rolling 12-month period. Flared gas net heating value and actual exit velocity determined in accordance with 40 CFR § 60.18(f)(4) shall be recorded at least once every 15 minutes.

Sulfur Recovery Unit

9. The site shall monitor and record the H₂S in the incoming gas to be processed and shall not accept gas that exceeds 100 ppmv H₂S.
10. The permit holder shall record the dates and times the sulfur recovery process exhaust gas is directed to the flare, the Sulfurox unit is bypassed (amine system exhaust routed directly to the flare), and when the systems are restored to a normal operating line-up. The time period the Sulfurox unit or incinerator is bypassed and directed to the flare shall be minimized and shall not exceed 876 hours in any rolling 12-month period.
11. The Sulfur Recovery Incinerator, EPN 4, shall always maintain the exhaust above 1400°F and 3% O₂ when waste gas is directed to the incinerator, unless alternate limitations are established through stack testing. The temperature and oxygen shall be monitored and recorded with records of when waste gas is fed into the incinerator.

Fugitives Piping, Valves, Connectors, Pumps, Agitators, and Compressors – 28VHP

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

- A. The requirements of paragraphs F and G shall not apply (1) where the VOC has an aggregate partial pressure or vapor pressure of less than 0.044 pounds per square inch, absolute (psia) at 68°F or (2) operating pressure is at least 5 kilopascals (0.725 psi) below ambient pressure. Equipment excluded from this condition shall be identified in a list or by one of the methods described below to be made readily available upon request.

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

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

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

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

- C. New and reworked underground process pipelines shall contain no buried valves such that fugitive emission monitoring is rendered impractical. New and reworked buried connectors shall be welded.
- D. To the extent that good engineering practice will permit, new and reworked valves and piping connections shall be so located to be reasonably accessible for leak-checking during plant operation. Difficult-to-monitor and unsafe-to-monitor valves, as defined by Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115), shall be identified in a list to be made readily available upon request. The difficult-to-monitor and unsafe-to-monitor valves may be identified by one or more of the methods described in Paragraph A above. If an unsafe to monitor component is not considered safe to monitor within a calendar year, then it shall be monitored as soon as possible during safe to monitor times. A difficult to monitor component for which quarterly monitoring is specified may instead be monitored annually.
- E. New and reworked piping connections shall be welded or flanged. Screwed connections are permissible only on piping smaller than two-inch diameter. Gas or hydraulic testing of the new and reworked piping connections at no less than operating pressure shall be performed prior to returning the components to service or they shall be monitored for leaks using an approved gas analyzer within 15 days of the components being returned to service. Adjustments shall be made as necessary to obtain leak-free performance. Connectors shall be inspected by visual, audible, and/or olfactory means at least weekly by operating personnel walk-through.

Each open-ended valve or line shall be equipped with an appropriately sized cap, blind flange, plug, or a second valve to seal the line. Except during sampling, both valves shall be closed. If the isolation of equipment for hot work or the removal of a component for repair or replacement results in an open ended line or valve, it is exempt from the requirement to install a cap, blind flange, plug, or second valve for 72 hours. If the repair or replacement is not completed within 72 hours, the permit holder must complete either of the following actions within that time period;

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

- F. Accessible valves shall be monitored by leak-checking for fugitive emissions at least quarterly using an approved gas analyzer. Sealless/leakless valves (including, but not limited to, welded bonnet bellows and diaphragm valves) and relief valves equipped with a rupture disc upstream or venting to a control device are not required to be monitored. If a relief valve is

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

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

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

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

- G. Except as may be provided for in the special conditions of this permit, all pump, compressor, and agitator seals shall be monitored with an approved gas analyzer at least quarterly or be equipped with a shaft sealing system that prevents or detects emissions of VOC from the seal. Seal systems designed and operated to prevent emissions or seals equipped with automatic seal failure detection and alarm system need not be monitored. These seal systems may include (but are not limited to) dual pump seals with barrier fluid at higher pressure than process pressure, seals degassing to vent control systems kept in good working order, or seals equipped with an automatic seal failure detection and alarm system. Submerged pumps or sealless pumps (including, but not limited to, diaphragm, canned, or magnetic-driven pumps) may be used to satisfy the requirements of this condition and need not be monitored.
- H. Damaged or leaking valves or connectors found to be emitting VOC in excess of 500 parts per million by volume (ppmv) or found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. Damaged or leaking pump, compressor, and agitator seals found to be emitting VOC in excess of 2,000 ppmv or found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. A first attempt to repair the leak must be made within 5 days and a record of the attempt shall be maintained.
- I. A leaking component shall be repaired as soon as practicable, but no later than 15 days after the leak is found. If the repair of a component would require a unit shutdown that would create more emissions than the repair would eliminate, the repair may be delayed until the next scheduled shutdown. All leaking components which cannot be repaired until a scheduled shutdown shall be identified for such repair by tagging within 15 days of the detection of the leak. A listing of all components that qualify for delay of repair shall be maintained on a delay of repair list. The cumulative daily emissions from all components on the delay of repair list shall be estimated by multiplying by 24 the mass emission rate for each component

calculated in accordance with the instructions in 30 TAC 115.782 (c)(1)(B)(i)(II). The calculations of the cumulative daily emissions from all components on the delay of repair list shall be updated within ten days of when the latest leaking component is added to the delay of repair list. When the cumulative daily emission rate of all components on the delay of repair list times the number of days until the next scheduled unit shutdown is equal to or exceeds the total emissions from a unit shut down as calculated in accordance with 30 TAC 115.782 (c)(1)(B)(i)(I) or 500 pounds, whichever is greater, the TCEQ Regional Manager and any local programs shall be notified and the TCEQ Executive Director may require early unit shut down or other appropriate action based on the number and severity of tagged leaks awaiting shutdown. This notification shall be made within 15 days of making this determination.

- J. Records of repairs shall include date of repairs, repair results, justification for delay of repairs, and corrective actions taken for all components. Records of instrument monitoring shall indicate dates and times, test methods, and instrument readings. The instrument monitoring record shall include the time that monitoring took place for no less than 95% of the instrument readings recorded. Records of physical inspections shall be noted in the operator's log or equivalent.
- K. Alternative monitoring frequency schedules of 30 TAC 115.352 - 115.359 or National Emission Standards for Organic Hazardous Air Pollutants, 40 CFR Part 63, Subpart H, may be used in lieu of Items G through H of this condition.
- L. Compliance with the requirements of this condition does not assure compliance with requirements of 30 TAC Chapter 115, an applicable New Source Performance Standard (NSPS), or an applicable National Emission Standard for Hazardous Air Pollutants (NESHAPS) and does not constitute approval of alternative standards for these regulations.

Maintenance, Startup and Shutdown

- 13. This permit authorizes the emissions from planned maintenance, startup, and shutdown (MSS) activities on all the facilities, piping and equipment at the site, including complete plant turnarounds as follows:
 - A. These activities include depressurization and purging the equipment to the plant flare EPN 5.
 - B. Maintenance includes cleaning, adjustment and repair of the equipment that may include opening the equipment to the atmosphere releasing residual air contaminants not depressurized or purged to the flare which are accounted in EPN DEGAS MSS for plant turnarounds and startup, and in EPN DEGAS for activities between turnarounds. The facilities and equipment shall be degassed and purged to the plant flare until the VOC concentration is less than 10,000 parts per million by volume (ppmv) or 10 % of the lower explosive limit (LEL).
 - C. Planned maintenance pigging includes opening the pig launcher or receiver to place or remove the pig, the equipment may not require purging to 10,000 ppmv or 10% of the LEL after controlled depressurizing. These emissions are accounted in EPN PIGVOC.

- D. Catalyst change outs during these planned maintenance activities after degassing to the flare opening emissions may have potential particulate emissions accounted in EPN CATCHANGE.
- E. Additionally, this permit authorizes emissions from temporary catalyst containers used to support planned MSS activities at permanent site facilities: Emissions from temporary facilities are authorized provided the temporary facility (a) does not remain on the plant site for more than 12 consecutive months, (b) is used solely to support planned MSS activities at the permanent site facilities, and (c) does not operate as a replacement for an existing authorized facility.
- F. The performance of each planned MSS activity and the emissions associated with it resulting in emissions directly to the atmosphere through EPNs 5, DEGAS, DEGAS MSS, CATCHANGE and PIGVOC shall be recorded and include at least the following information:
 - (1) the process unit at which emissions from the MSS activity occurred, including the emission point number and common name of the process unit;
 - (2) the type of planned MSS activity and the reason for the planned activity;
 - (3) the common name and the facility identification number, if applicable, of the facilities at which the MSS activity and emissions occurred;
 - (4) the date and time of the MSS activity and its duration;
 - (5) the estimated quantity of each air contaminant, or mixture of air contaminants, emitted with the data and methods used to determine it. The emissions shall be estimated using the methods identified in the permit application, consistent with good engineering practice.

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

- 14. 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

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

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

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

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

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

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

measured contaminant concentration (ppmv) < release concentration.

Where the release concentration is:

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

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

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

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

(1) The detector shall be calibrated within 30 days of use with a certified propane gas standard at 25% of the lower explosive limit (LEL) for propane. 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 propane. 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 propane may be used for calibration and functionality tests provided that the LEL response is within 95% of that for propane.

15. 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. The testing required by this special condition shall be used to determine compliance with the best available control technology limits of the Special Conditions and compliance with the MAERT. Sampling must be conducted in accordance with appropriate procedures of the TCEQ Sampling Procedures Manual and in accordance with EPA Reference Method (RM) 9 for opacity, RM 10 for CO, RM 7E for NO_x, RM 25A modified to exclude methane and ethane for the concentration of VOC (to measure total carbon as propane), and RM 3 for O₂ or equivalent methods. Sampling by means of one of the test methods specified in 40 CFR § 60.45(b) or any test method approved by the EPA and/or the TCEQ Executive Director, including methods to determine the sulfur content in fuels, shall be conducted to determine initial compliance with the sulfur dioxide (SO₂) limit of this permit.

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

- A. The nearest TCEQ 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.

Additional information shall be provided upon request. The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test reports.

A written proposed description of any deviation from sampling procedures specified in permit conditions or the 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 Special Condition No. 15B shall be submitted to the TCEQ Austin Office of Air, Air Permits Division. Test waivers and alternate or equivalent procedure proposals for New Source Performance Standards (NSPS) testing which must have the EPA approval shall be submitted to the TCEQ Regional Director.

- B. Air contaminants emitted from Boiler Nos. 2 and 3 to be tested for at a maximum firing rate include (but are not limited to) NO_x, CO, VOC, SO₂, O₂, and opacity. If Boiler Nos. 2 and 3 are unable to operate at a maximum firing rate during the test, then future operating loads shall be limited to the maximum firing rate. Additional stack testing may be required when operating at higher firing rates than those achieved during the initial compliance test.
- C. Air contaminants emitted from the SRU Incinerator (EPN 4) to be tested for include (but are not limited to) organic disulfides.
- D. Air contaminants emitted from No. 1 Boiler (EPN 3) to be tested for include (but are not limited to) NO_x and SO₂.

- E. Sampling ports and platforms shall be incorporated into the design of the boiler stacks according to the specifications set forth in the attachment entitled "Chapter 2, Stack Sampling Facilities." Alternate sampling facility designs may be submitted for approval by the Executive Director of the TCEQ.
- F. Sampling shall occur within 60 days after the facilities achieve maximum production but not later than 180 days after initial startup of the facilities and at such other times as may be required by the Executive Director of the TCEQ. Requests for additional time to perform stack sampling shall be submitted to the nearest TCEQ Regional Office.
- G. Sampling reports shall comply with the provisions of Chapter 14 of the TCEQ Sampling Procedures Manual. Copies of the final sampling report including the results of the Performance Specification Test shall be submitted within 60 days of the completion of the stack sampling to the following:

One to the TCEQ Corpus Christi Regional Office.
- H. Initial determination of compliance testing for the SRU Incinerator and No. 1 Boiler was completed in 1992. Initial determination of compliance testing for Boiler Nos. 2 and 3 was completed in August 2003. As such, no additional or new initial determination of compliance is required in this permit.

Off-Gas

- 16. Periods of off-gas production shall be limited to the extent practicable. Off-gas shall be burned in the flare, EPN 5, and the periods of off-gas combustion and emissions shall be recorded with the reasons for creation of the off-gas and corrective actions taken.

Air Products Source Emissions

- 17. Waste gas streams at the Air Products Site (RN105863914) requiring control are routed to the Markwest Facility Flare, EPN 5, for disposal with the consent of the permit holder. The activities that generate these waste gas streams are identified in Special Condition No.12 of Air Products Permit No. 87549. These activities include maintenance, startup and shutdown (MSS) related emissions.

Air Products shall provide the permit holder with records identifying each activity that resulted in emissions being routed to the flare and the estimated emissions associated with each activity on a monthly basis.

Permit by Rule Reference

- 18. The following sources and/or activities are authorized under a Permit by Rule (PBR) by Title 30 Texas Administrative Code Chapter 106 (30 TAC Chapter 106). These lists are not intended to be all inclusive and can be altered without modifications to this permit.

Authorization	Source or Activity
PBR No. 87501 (issued 3/3/2009)	Emergency Engine
30 TAC § 106.511 (claimed 10/2017)	Emergency Engine Replacement
30 TAC § 106.532 (claimed 09/2018)	Wastewater System update.

Dated: DRAFT February 2020

DRAFT