

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Toby Baker, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

9489 0090 0027 6002 5171 60

June 21, 2019

RETURN RECEIPT REQUESTED ####

MRS DIANE CHAMBERLAIN
PRESIDENT MANAGING DIRECTOR
BAYPORT POLYMERS LLC
PO BOX 5010
LA PORTE TX 77572-5010

Re: Alternative Method of Control (AMOC) No. 113
Port Arthur Refinery Ethane Cracker
Multipoint Ground Flare
Regulated Entity Number: RN109845768
Customer Reference Number: CN605458397
Associated Permit Numbers: 122353, GHGPSDTX114, and PSDTX1426

Dear Mrs. Chamberlain:

This correspondence is in response to Bayport Polymers LLC's (Baystar's) December 3, 2018 request for a multipoint ground flare (MPGF) system at the Port Arthur Refinery site, Ethane Cracker project and use an AMOC to comply with applicable requirements of 30 Texas Administrative Code Chapter 115 (see Attachment A).

We understand the MPGF (EPN: XF-4601) is designed to provide safe control of gases vented from normal operations, planned maintenance, startup and shutdowns (MSS), and upsets. We also understand the high-pressure operations of the MPGF will not meet the tip velocity requirements of 40 CFR §60.18 at all times. Based on the review of the information submitted, performance testing demonstrates proper flare operation, cross-lighting, flame stability, smokeless operation, and greater than 98% destruction rate effectiveness (DRE) is expected for the high-pressure stages of the MPGF.

The Texas Commission on Environmental Quality (TCEQ) Executive Director has made a final decision to approve your AMOC request. The conditions upon which the MPGF is approved are attached to this correspondence. Please maintain these conditions along with all related records.

The TCEQ has been delegated authority to enforce the above cited standards and is authorized to approve this AMOC. You are reminded that approval of any AMOC shall not abrogate the Executive Director or Administrator's authority under the Act or in any way prohibit later canceling the AMOC. By copy of this letter we are informing the Environmental Protection Agency, Region 6, of this decision as required by TCEQ's delegation of authority.

This AMOC approval may supersede certain requirements or representations in Permit Nos. 122353, GHGPSDTX114, and PSDTX1426. To ensure effective and consistent enforceability, we request that Baystar incorporate this AMOC into the permits through submittal of alterations no later than 90 days after this approval.

June 21, 2019
Page 2
Mrs. Diane Chamberlain

Re: Permit Numbers: 122353, GHGPSDTX114, and PSDTX1426

If you need further information or have any questions, please contact Ms. Anne Inman, P.E. at (512) 239-1276 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Wilson", with a stylized flourish at the end.

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

Enclosures

cc: Mr. Don Clauson, Environmental Coordinator, Bayport Polymers
Air Section Manager, Region 10 - Beaumont
Rebecca Partee, Manager, Chemical New Source Review Permits Section, Air Permits Division, OA: MC-163

Project Number: 294330

Re: Permit Numbers: 122353, GHGPSDTX114, and PSDTX1426

Attachment A: Potential State and Federal Applicability

30 Texas Administrative Code (TAC) Chapter 115

- Subchapter B: General Volatile Organic Compound Sources
 - Division 2: Vent Gas Control, 115.122
 - Division 3: Water Separation
 - Division 4: Industrial Wastewater
- Subchapter C: Volatile Organic Compound Transfer Operations
 - Division 1: Loading and Unloading Of Volatile Organic Compounds
- Subchapter D: Petroleum Refining, Natural Gas Processing, and Petrochemical Processes.
 - Division 1: Process Unit Turnaround and Vacuum-Producing Systems in Petroleum Refineries
 - Division 3: Fugitive Emission Control in Petroleum Refining, Natural Gas/Gasoline Processing, And Petrochemical Processes in Ozone Nonattainment Areas
- Subchapter F: Miscellaneous Industrial Sources
 - Division 3: Degassing of Storage Tanks, Transport Vessels And Marine Vessels

Standards of Performance for New Stationary Sources (NSPS), 40 Code of Federal Regulations (CFR) Part 60:

- Subpart A, General Provisions.
- Subpart Kb, Volatile Organic Liquid Storage Vessels.
- Subpart VVa, Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry (SOCMI).
- Subpart NNN, VOC Emissions from SOCMI Distillation Operations.
- Subpart RRR, VOC Emissions from SOCME Reactor Processes.

National Emission Standards for Hazardous Air Pollutants (NESHAPs) in 40 CFR Part 61:

- Subpart A, General Provisions.
- Subpart J, Equipment Leaks of Benzene.
- Subpart V, Equipment Leaks.
- Subpart FF, Benzene Waste Operations.

Maximum Achievable Emission Limits (MACT) for NESHAP Sources in 40 CFR Part 63:

- Subpart A, General Provisions.
- Subpart UU, Equipment Leaks – Control Level 2 Standards.
- Subpart XX, Ethylene Manufacturing Process Units: Heat Exchange Systems and Waste Operations.
- Subpart YY, General Maximum Achievable Control Technology (MACT) Standards.
- Subpart EEEE, Organic Liquids Distribution (Non-Gasoline).

