

Amber OLAH

From: Don CLAUSON
Sent: Friday, March 27, 2020 12:49 PM
To: 'Jasmine Yuan'
Cc: Lorentine SAVOY; Damian FRYOUX; Eric MILLER
Subject: RE: Technical Review -- FOP O4161/Project 29330, Bayport Polymers LLC

Follow Up Flag: Follow up
Flag Status: Flagged

We have gone through the draft Title V Permit and only have a few comments. First, Special Condition 4 kind of surprised us. We are not sure we are subject to §115, Subchapter B and suspect we may have checked a wrong box in the application. Can you please help us determine what we submitted that drove the addition to this special condition.

Thanks you for adding Special Condition 21 in regard to referencing the MPGF AMOC. The copy of the draft permit you sent us only has the first few pages of the AMOC. Do you plan to attach the entire AMOC to the end of the final application? If not could you please reference the AMOC number and issuance date in Special Condition 21? One last thing, starting on Page 33 of the draft permit, we suggest you add "See AMOC 113" to the Monitoring and Testing Requirements for XF-4601 and XF4601VENT.

I am a little concerned with Special Condition 10. Not that it shouldn't be in the permit, but rather if the project group is aware of it. I have forwarded it to multiple people to review but have not heard back. I will continue pushing the concern and hope to hear back from everyone soon. Please proceed with the current language, but do not be surprised if I submit comments regarding this condition before the end of the process.

We have no additional comments at this time. Thanks again for allowing us a few extra weeks to look the draft permit over. These are truly unusual times.

Don Clauson
Environmental Coordinator

REFINING & CHEMICALS

HSSE

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From: Jasmine Yuan [mailto:Jasmine.Yuan@tceq.texas.gov]
Sent: Thursday, February 27, 2020 2:23 PM
To: Don CLAUSON <don.clauson@total.com>
Cc: Lorentine SAVOY <lorentine.savoy@total.com>; Damian FRYOUX <damiian.fryoux@total.com>; Eric MILLER

<eric.miller@total.com>

Subject: RE: Technical Review -- FOP O4161/Project 29330, Bayport Polymers LLC

Hello Don,

Our tech spec Alfredo Mendoza approved the case by case CAM for the thermal oxidizer and the ground flare. We basically use the language you proposed. However, we twisted some a little bit. You will see the changes in yellow highlights at the permit CAM/PM section. Please review the permit draft and provide your comments within 14 days.

Thanks!

Sincerely,

Jasmine Yuan

Operating Permits Section

Air Permits Division

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

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How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Don CLAUSON <don.clauson@total.com>

Sent: Monday, February 24, 2020 1:24 PM

To: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>

Cc: Lorentine SAVOY <lorentine.savoy@total.com>; Damian FRYOUX <damian.fryoux@total.com>; Eric MILLER <eric.miller@total.com>

Subject: RE: Technical Review -- FOP O4161/Project 29330, Bayport Polymers LLC

Please see my response in red text.

From: Jasmine Yuan [<mailto:Jasmine.Yuan@tceq.texas.gov>]

Sent: Friday, February 21, 2020 4:17 PM

To: Don CLAUSON <don.clauson@total.com>

Cc: Lorentine SAVOY <lorentine.savoy@total.com>; John David MURPHY <john-david.murphy@total.com>; Trisha Froemming (tfroem@buell-consulting.com) <tfroem@buell-consulting.com>; Eric MILLER <eric.miller@total.com>; Damian FRYOUX <damian.fryoux@total.com>

Subject: RE: Technical Review -- FOP O4161/Project 29330, Bayport Polymers LLC

Hello Don,

First, I understand you want to have ground flare XF-4601 AMOC in the Title V permit. I will do that for sure. The AMOC Term 2 (a)(b)(c) are consistent with the CAM-FL-001 option, saying a flame present all times. Therefore, I am going to use the CAM-FL-001 for the ground flare CAM option.

The only concern I have is simply stating that "a flame shall be present at all times" is not very descriptive and could create confusion for both Operators and TCEQ Staff. As discussed in the AMOC, this flare will have 11 stages and 304 burners. Each stage will have 2 pilots. The AMOC requires that at least 1 pilot in each of the 11 stages must operate with a flame present at all times. Operations could interpret "a flame present at all times" as meaning only one pilot in the flare needs to be present at all times. In other words, as long as one of the pilots in the flare is lit, the flare is in compliance. On the other hand, the statement "a flame shall be present at all times" could be interpreted by the TCEQ to suggest each of the 304 burners must have a flame present at all times. Both of these interpretations are incorrect. I believe the CAM requirement is meant to add value to assuring compliance and should avoid future confusion. I suggest that it be made clear that CAM will require each of the 11 stages shall have two pilots and that at least one pilot be lit at all times.

Secondly, the second PM frequency for group furnace is weekly, which satisfies your need. **Thanks**

The third CAM has the deviation limit of temperature. Do you know the temperature yet? Can you give me an minimum estimate, such as 1400F, or 1300F? I need to send to our technical specialist for his review.

As directed by NSR Permit 122353 Special Condition 15, until the initial performance test is completed, the fire box temperature shall be maintained above 1,400 °F. During the performance test, the actual firebox temperature shall be recorded and will become the final fire box temperature limit (providing exhaust gas is less than 10 ppmvd @ 3% O₂ or 99.9% during the test).

Thanks,
Jasmine Yuan
5122396090

From: Don CLAUSON <don.clauson@total.com>
Sent: Thursday, February 20, 2020 9:32 AM
To: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>
Cc: Lorentine SAVOY <lorentine.savoy@total.com>; John David MURPHY <john-david.murphy@total.com>; Trisha Froemming (<tfroem@buell-consulting.com>) <tfroem@buell-consulting.com>; Eric MILLER <eric.miller@total.com>; Damian FRYOUX <damian.fryoux@total.com>
Subject: RE: Technical Review -- FOP O4161/Project 29330, Bayport Polymers LLC

I have responded to each of your comments below in red text. We are also working on a response to your 11-Feb-2020 email and will respond by 25-Feb-2020 as requested. Please let me know if you have any questions.

Don Clauson
Environmental Coordinator

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Don

From: Jasmine Yuan [<mailto:Jasmine.Yuan@tceq.texas.gov>]
Sent: Monday, February 10, 2020 4:11 PM
To: Don CLAUSON <don.clauson@total.com>
Cc: Eric MILLER <eric.miller@total.com>; Damian FRYOUX <damian.fryoux@total.com>; Lorentine SAVOY <lorentine.savoy@total.com>
Subject: RE: Technical Review -- FOP O4161/Project 29330, Bayport Polymers LLC

Hello Don,

I have reviewed your responses. Everything looks good.

Regarding the CAM/PM, I have discussed it with our technical specialist Alfredo Mendoza. We suggest you should use the cam/pm options listed in the guidance, instead of case by case (you need to provide justification for using case by case. However, you did not provide justification).

Because your proposed case by case is very similar to the options in our guidance. I am providing the option details below. Please review and confirm it is okay to use the suggested options.

Otherwise, you will need to provide your case by case option justifications, and minimum frequency. Then, I will ask our tech spec to review.

1. Device ID: XF-4601, CAM Case by Case. The proposal does not look like case by case. It should be CAM Option No. CAM-FL-001. The Minimum frequency should be continuous per the flare pilot flame monitoring and NSPS 60.18.

Compliance Assurance Monitoring Option

INDICATOR MONITORED	SIZE	MONITORING SPECIFICATIONS AND PROCEDURES
CONTROL DEVICE: FLARE		
1. Pilot Flame	Small/ Large	Monitor the presence of a flare pilot flame using a thermocouple or other equivalent device to detect the presence of a flame or using an alarm that uses a thermocouple or other equivalent device to detect the absence of a flame. Maintain records of alarm events and duration of alarm events. Each monitoring device shall be accurate to within manufacturer's recommendations. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or other written procedure that provide an adequate assurance that the device is calibrated accurately. <u>Deviation Limit:</u> No pilot flame.

EPN XF-4601 is a Multi-Point Ground Flare (MPGF) with 11 stages and a total of 304 burners. Each stage will have 2 pilots. When we submitted the Title V Permit Application you are currently reviewing, we had not yet received an Alternative Means of Control (AMOC) for this MPGF. The AMOC was approved by the TCEQ on 21-jun-2019. I have attached a copy of the AMOC to this email. Of particular importance, Condition 2(a) of the AMOC states that each of the 11 stages will be equipped with two pilots with at least 1 of the 2 pilots lit at all times. The AMOC is now an attachment to our NSR Permit. Would it be possible to make it an attachment to the Title V Permit also?

2. Group GRP-FURNCAP. The PM Option should be PM-P-033. This option is not in the guidance yet. We developed recently. Visible emissions, minimum frequency : once per week.

PM text: Visible emissions observations shall be made and recorded. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 miles, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer’s eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor.

If visible emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If the result of the Test Method 9 is opacity above the opacity limit in the applicable requirement, the permit holder shall report a deviation.

This is acceptable. Special Condition 13(A) of the NSR permit requires EPA Test Method 22 to be conducted on the Decoke Cyclone Stacks at least once per day. We will likely change our current procedures to require Operations to conduct Method 22 on the furnace stacks at the same time. If Operations observes visible emissions, they will mobilize a certified smoke reader to conduct EPA Method 9 to determine the opacity of the emissions. Even though we will likely perform daily Method 22 of the furnace stacks, can you please leave the requirement at weekly. This will keep us in compliance if we miss a day. Also, we are in the process of preparing an “as-built” permit amendment application and would like to add this requirement to the special conditions of the NSR permit. Operations tend to reach for the NSR permit as their primary compliance tool and it will be good to have the requirement in both permits.

3. Unit X3800 VENT. It should use CAM Option No. CAM-TI-002. Minimum frequency is 4 times per hour.

		recommendations, engineering calculations, and/or historical data.
	Small/ Large	<p>The monitoring device should be installed in the combustion chamber or immediate downstream of the combustion chamber. Each monitoring device shall be calibrated frequency in accordance with the manufacturer’s specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following:</p> <ul style="list-style-type: none"> • $\pm 0.75\%$ of the temperature being measured expressed in degrees Celsius; or • ± 2.5 degrees Celsius. <p><u>Deviation Limit:</u> A minimum combustion temperature shall be established using the appropriate of the following: the most recent performance test data, manufacturer’s recommendations, engineering calculations, and/or historical data.</p>

We accept monitoring the temperature four time per hour. However, we would like to maintain the requested case-by-case language for Emission Unit X3800 VENT. This language mirrors similar language for vapor control devices in Title V permits at other Baystar and Total facilities. Aligning this language will ensure system consistency across plants within the organization.

Please respond as soon as you can.
Thank you very much!
Sincerely,

Jasmine Yuan

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Texas Commission on Environmental Quality
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How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Don CLAUSON <don.clauson@total.com>
Sent: Wednesday, November 20, 2019 3:14 PM
To: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>
Cc: Eric MILLER <eric.miller@total.com>; Damian FRYOUX <damian.fryoux@total.com>; Lorentine SAVOY <lorentine.savoy@total.com>
Subject: RE: Technical Review -- FOP O4161/Project 29330, Bayport Polymers LLC

Hi Jasmine,

Please see your original email for a response to your questions. Also, attached is a pdf with the relevant supporting documents.

Please let Lorentine or myself know if you have any additional questions.

Don Clauson
Environmental Coordinator

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From: Jasmine Yuan [<mailto:Jasmine.Yuan@tceq.texas.gov>]
Sent: Tuesday, November 19, 2019 1:32 PM

To: Don CLAUSON <don.clauson@total.com>

Cc: Eric MILLER <eric.miller@total.com>; Damian FRYOUX <damian.fryoux@total.com>; Lorentine SAVOY <lorentine.savoy@total.com>

Subject: FW: Technical Review -- FOP O4161/Project 29330, Bayport Polymers LLC

Hello All,

Upon review of the above referenced application we have determined that the application is deficient and additional information to complete the permit review is needed.

Please furnish the following information within 30 days or sooner.

1. UA-2, engines EMERGEN and GENERATOR, Table 1a Functionally identical replacement code should be YES or NO. The code you provided is FCD+, which is incorrect. Please double check and submit the updated forms by following the instruction. The UA2 instruction link is below

https://www.tceq.texas.gov/assets/public/permitting/air/Forms/Title_V/Unit_Attributes/10003.pdf

Response: The code "FCD+" belongs in the column entitled RACT Date Placed in Service. No additional form completion is necessary per the form instructions. An OP-UA2 has been attached noting this change.

2. UA12, the Unit ID you provided is 0. Please correct the form and submit the new one. Again on UA12, Page 37, the Index number is provided as 60VVa-ALL. However, the rule is not 60VVa. Should it be 60VV-ALL, or 60V-ALL? Please double check and submit updated forms, if necessary.

Response: Emission Unit ID no. SCFUG has been added to OP-UA12. A revised OP-UA12 has been attached. 40 CFR 60 Subpart VVa applies to sources in which construction, reconstruction, or modification commenced after November 7, 2006. Since the Ethane Cracker is a new unit, 40 CFR 60 Subpart VVa applies rather than 40 CFR 60 Subpart VV.

3. For the GRP-FURNCAP, the 111.111(a)(1) requires the PM or CAM monitoring. If the group does not meet CAM criteria and you do not have CAM associated with them, it is okay. The PM is still required due to the lack of the monitoring in the rules. Please select a PM option fitting your current monitoring plan and submit the OP-MON. The PM guidance link is provided below:

https://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/periodicmon.pdf

Response: Form OP-MON has been attached indicating which PM option has been included.

4. There are no attributes on the UA 3 Form provided in the application for Unit V-1291. Please submit the associated form if there are applicable requirements for the unit.

Response: A revised form OP-UA3 is attached. Form OP-REQ2 has also been attached for this emission unit.

5. Tank T-1202 and T-5672 do not contain sufficient and accurate attributes for the Index R5112. For instance, the code of tank description is missing. Please update the forms.

Response: A revised form OP-UA3 is attached.

6. OP-1 contains an invalid combination of affected states. It seems your site is within 50 miles of Louisiana. So please double check the OP-1 Section II.D. instruction. Update OP-1 by checking the states you may affect or checking N/A if there are not any.

Response: A revised form OP-1 is attached indicating that the site is located within 50 miles of Louisiana.

7. OP-1 Section I. E. question, please answer it by marking the major contaminants and submit the updated forms.

Response: A revised form OP-1 is attached indicating that the site is not a major source for SO2.

8. GHGPSDTX 114 was last updated on 10/09/2019, as shown in our system. NSR 122353 and PSD permit were last revised on 08/20/2019. Do you want to incorporate these most recent PC authorizations by updating the OP-REQ1 form? If so, please submit OP-REQ1, PCA pages 86, 87.

Response: Form OP-REQ1 is attached with the necessary updates to page 86 to reflect the most currently issued PCAs.

If you have questions, feel free to contact me.

Sincerely,

Jasmine Yuan

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Texas Commission on Environmental Quality
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From: Don CLAUSON <don.clauson@total.com>
Sent: Friday, November 8, 2019 8:52 AM
To: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>
Cc: Eric MILLER <eric.miller@total.com>; Damian FRYOUX <damian.fryoux@total.com>; Lorentine SAVOY <lorentine.savoy@total.com>
Subject: RE: Technical Review -- FOP O4161/Project 29330, Bayport Polymers LLC

Jasmine,

Please find attached a scanned copy of the OP-DEL for assigning Tommy Chavez as a DAR for the Bayport Polymers, LCC Port Arthur Ethane Cracker. The original signed document will be forwarded to the TCEQ via certified mail

Have a good weekend.

Don Clauson
Environmental Coordinator

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From: Jasmine Yuan [<mailto:Jasmine.Yuan@tceq.texas.gov>]
Sent: Monday, November 04, 2019 11:27 AM
To: Don CLAUSON <don.clauson@total.com>; Ethan SNELL <ethan.snell@baystar.com>; Lorentine.Savory@baystar.com;
Lorentine.Savory@total.com
Cc: Eric MILLER <eric.miller@total.com>
Subject: RE: Technical Review -- FOP O4161/Project 29330, Bayport Polymers LLC

Hello Don,

How are you? I remember you and others. It was 2013 or 2014 Spring. Mat, Beth, Cheryl, and myself visited your site. Thank you again for your gracious hospitality: professionalism, knowledge, and lunch ☺. Mat is now working for Toyota in Dallas.

Right now, we have Mr. Riffer as RO in TCEQ system. I do not know why it was entered like that. Therefore, you need to submit OP-CRO2 to change the RO to Ms. [Chamberlain](#). Then, let her sign OP-DEL to reassign Mr. Riffer as DAR again.

Please email me the major NSR summary table at your convenient time. No rush. I will need it at the end of the review.

I am glad I can help y'all with this project.

Sincerely,

Jasmine Yuan

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How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Don CLAUSON <don.clauson@total.com>
Sent: Monday, November 4, 2019 11:15 AM
To: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>; Ethan SNELL <ethan.snell@baystar.com>; Lorentine.Savory@baystar.com; Lorentine.Savory@total.com
Cc: Eric MILLER <eric.miller@total.com>
Subject: RE: Technical Review -- FOP O4161/Project 29330, Bayport Polymers LLC

Good Morning Jasmine,

I believe we met a few years ago when you visited the La Port Polypropylene Plant with a group of TCEQ permit writers. It will be good finally working with you.

The RO for Bayport Polymers is Diane Chamberlain. Her office is located at the Bayport Polymers Site in Pasadena, Texas. She has been, and will continue to be the RO for the Bayport Polymer, LCC Site. Ryan Riffer is the Operations Manager at the Total Petrochemicals and Refining, USA, Inc. Port Arthur Refinery (PAR). Because of the proximity to the refinery, Total will operate the Bayport Polymers LCC, Port Arthur Ethane Cracker. At the time of the original application submittal, Mr. Riffer was acting as the refinery's Plant Manager and he was assigned by Diane Chamberlain as a DAR for the Ethane Cracker. Since the time we submitted the original application, Mr. Tommy Chavez was hired as the new plant manager. He should also be assigned by Diane Chamberlain as a DAR. It is Total's understanding that Diane Chamberlain can assign multiple DARs. If this is correct, we will likely keep Ryan Riffer as a DAR, as well as add Tommy Chavez as the primary DAR. Mr. Riffer will remain a DAR to backup Mr. Chavez.

Can you please check to make sure Diane Chamberlain is the current RO for the site?

The NAICS Code for the site is: 325110. The official name of the site is Bayport Polymers, LCC, Port Arthur Ethane Cracker.

Once again, I am looking forward to assisting you in your review of the application.

Don Clauson
Environmental Coordinator

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From: Jasmine Yuan [<mailto:Jasmine.Yuan@tceq.texas.gov>]
Sent: Monday, November 04, 2019 10:43 AM
To: Don CLAUSON <don.clauson@total.com>; Ethan SNELL <ethan.snell@baystar.com>; Loretine.Savory@baystar.com;
Loretine.Savory@total.com
Subject: Technical Review -- FOP O4161/Project 29330, Bayport Polymers LLC

Good Morning,

I have been assigned to the Federal Operating Permit (FOP) initial issuance permit application of Permit No. O4161 for Bayport Polymers LLC. This application has been assigned Project No. 29330. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

After a quick review, I have several questions.

Who are the RO and DAR now? If I am understanding correct, you will need to fill OP-CRO2 to change RO from Mr. Riffer to Ms. Diane Chamberlain. Then, Ms. Chamberlain will assign Mr. Riffer as DAR by submitting OP-DEL.

Second, please email me the major NSR summary table in word document so that I can edit on it.

Third, what is the NAICS code and name for the site?

Please submit the above requested forms and table within 14 days, due 11/18/2019.

Thank you for your cooperation.

Sincerely,

Jasmine Yuan

Operating Permits Section

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