

SPECIAL CONDITIONS

Permit Number 5215A

EMISSION STANDARDS

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

FEDERAL APPLICABILITY

2. These facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations in Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60) on Standards of Performance for New Source Performance Standards (NSPS) promulgated for the following:
 - A. Equipment Leaks of Volatile Organic Compounds (VOC) in Synthetic Organic Chemical Manufacturing Industry (SOCMI) Processes, Subparts A and VV.
 - B. The VOC Emissions from SOCMI Distillation Operations, Subparts A and NNN.
 - C. The VOC Emissions from SOCMI Reactor Processes, Subparts A and RRR.
3. These facilities shall comply with all applicable requirements of the EPA regulations in 40 CFR Part 61 on National Emission Standards for Hazardous Air Pollutants (NESHAPS) promulgated for the following:
 - A. Equipment Leaks (Fugitive Emission Sources) of Benzene, Subparts A and J.
 - B. Equipment Leaks (Fugitive Emission Sources), Subparts A and V.
 - C. Benzene Waste Operations, Subparts A and FF.
4. These facilities shall comply with all applicable requirement of Title 30 Texas Administrative Code (30 TAC) ' ' 113.110, 113.120, and 113.130 including the referenced requirements contained in the EPA regulations of NESHAPS for Source Categories promulgated for the SOCMI for Subparts F - SOCMI Manufacturing; G - Process Vents, Storage Vessels, Transfer Operations, and Wastewater; and H - Equipment Leaks.

OPERATIONAL PRACTICES

5. The Heater designated as Emission Point No. (EPN) E-02-1746 shall comply with all applicable requirements of EPA regulations on Standards of Performance for New Stationary Sources promulgated for Petroleum Refineries in 40 CFR Part 60, Subparts A and J. The heater when burning refinery fuel gas is subject to the continuous emission monitoring (CEM) requirements of 40 CFR Part 60, Subpart J. The CEM shall be placed at any location upstream of each combustion unit so long as the CEM accurately reflects the hydrogen sulfide concentration of the refinery fuel gas being burned. The CEM may be found at the neighboring petroleum refinery that supplies refinery fuel gas to this permitted facility.
6. The Heater identified as EPN E-02-1746 shall emit no more than 0.03 pound nitrogen oxide/MMBtu when firing pipeline-quality sweet natural gas, refinery fuel gas, V-710 off-gas, and 1544 demethanizer off-gas. Heater-fired duty is limited to a maximum of 78.3 MMBtu per hour. Natural gas fired in this heater is limited to 8,760 hours per rolling 12 months. Refinery fuel gas, V-710 off-gas and 1544 demethanizer off gas fired in this heater is limited to a total of 1,752 hours per rolling 12 months. Records shall be kept at the plant site demonstrating compliance with this special condition; and the records shall include hours per month when each fuel type is fired in this heater.
7. Truck loading operations are limited to the liquids identified below at the rates indicated.

<u>Liquid</u>	<u>Gallons per Hour</u>	<u>Gallons/rolling 12 months</u>
Cumene	12,000	10,080,000

All truck tank loading shall be by submerged filling and rolling 12-month throughput records shall be maintained and updated at least once every six months.

All lines and connectors shall be visually inspected for any defects prior to hookup. Lines and connectors that are visibly damaged shall be removed from service. Operations shall cease immediately upon detection of any liquid leaking from the lines or connections.

Each tank truck shall pass vapor-tight testing once every 12 months using the methods described in 40 CFR Part 60, Subpart XX.

LEAK DETECTION AND REPAIR PROGRAM

8. Piping, Valves, Flanges, Pumps, Connectors and Compressors in VOC Service - 28VHP

- A. These conditions shall not apply (1) where the VOC have an aggregate partial pressure or vapor pressure of less than 0.044 pound per square inch, absolute at 68°F or (2) operating pressure is at least 5 kilopascals (0.725 pound per square inch) below ambient pressure. Equipment excluded from this condition shall be identified in a list to be made available upon request.
- B. Construction of new and reworked piping, valves, pump systems, and compressor systems shall conform to applicable American National Standards Institute, American Petroleum Institute, American Society of Mechanical Engineers, or equivalent codes.
- C. New and reworked underground process pipelines shall contain no buried valves such that fugitive emission monitoring is rendered impractical.
- 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. Non-accessible valves, as defined by 30 TAC Chapter 115, shall be identified in a list to be made available upon request.
- E. New and reworked piping connections shall be welded or flanged. Screwed connections are permissible only on piping smaller than two-inch diameter. No later than the next scheduled quarterly monitoring after initial installation or replacement, all new or reworked connections shall be gas-tested or hydraulically-tested at no less than normal operating pressure and adjustments 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 a cap, blind flange, plug, or a second valve. Except during sampling, the second valve shall be closed.

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- 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. 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.

An approved gas analyzer shall conform to requirements listed in 40 CFR ' 60.485(a)-(b).

Replaced 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 and compressor seals shall be monitored with an approved gas analyzer at least quarterly or be equipped with a shaft sealing system that prevents or detects emissions of VOC from the seal. Seal systems designed and operated to prevent emissions or seals equipped with an automatic seal failure detection and alarm system need not be monitored. These seal systems may include (but are not limited to) dual pump seals with barrier fluid at higher pressure than process pressure, seals degassing to vent control systems kept in good working order, or seals equipped with an automatic seal failure detection and alarm system. Submerged pumps or sealless pumps (including, but not limited to, diaphragm, canned, or magnetic-driven pumps) may be used to satisfy the requirements of this condition and need not be monitored.
- H. Damaged or leaking valves or connectors found to be emitting VOC in excess of 500 parts per million by volume (ppmv) or found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. Damaged or leaking pump and compressor 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.
- I. Every reasonable effort shall be made to repair a leaking component, as specified in this paragraph, within 15 days after the leak is found. If the repair of a component would require a unit shutdown, 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. At the discretion of the TCEQ Executive Director or his designated representative, early unit shutdown or other appropriate action may be required based on the number and severity of tagged leaks awaiting shutdown.

- J. The results of the required fugitive instrument monitoring and maintenance program shall be made available to the TCEQ Executive Director or his designated representative upon request. Records shall indicate appropriate dates, test methods, instrument readings, repair results, justification for delay of repairs, and corrective actions taken for all components. Records of physical inspections are not required unless a leak is detected.
- K. Alternative monitoring frequency schedules of 30 TAC ' ' 115.352 through 115.359 or National Emission Standards for Organic Hazardous Air Pollutants, 40 CFR Part 63, Subpart H, may be used in lieu of Items F through G of this condition.
- L. Compliance with the requirements of this condition does not assure compliance with requirements of 30 TAC Chapter 115, an applicable NSPS, or an applicable NESHAPS and does not constitute approval of alternative standards for these regulations.

9. Instrument Connectors and Flanges Monitoring - Annual 28 CNTA

In addition to the weekly physical inspection required by Item E of Special Condition No. 8, all connectors and flanges in gas/vapor and light liquid service shall be monitored annually with an approved gas analyzer in accordance with Items F through J of Special Condition No. 8. Alternative monitoring frequency schedules ("skip options") of 40 CFR Part 63, Subpart H, National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks, may be used in lieu of the monitoring frequency required by this permit condition. Compliance with this condition does not assure compliance with requirements of applicable state or federal regulations and does not constitute approval of alternative standards for these regulations.

RECORDKEEPING

- 10. Records required by these special conditions shall be maintained for at least two years and shall be readily available to TCEQ personnel upon request.

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Dated May 5, 2009