

US EPA ARCHIVE DOCUMENT

Rohm and Haas Texas Incorporated, Deer Park
Boiler House Unit Expansion Project
Prevention of Significant Deterioration Permit of Greenhouse Gas Emissions
PSD-TX-1320-GHG

Summary of Revisions in Final Permit

U.S. Environmental Protection Agency, Region 6
January 29, 2014

Summary of the Formal Public Participation Process

The U.S. Environmental Protection Agency, Region 6 (EPA) proposed to issue a Prevention of Significant Deterioration (PSD) permit to Rohm and Haas Incorporated, Deer Park (Rohm and Haas), on December 26, 2013. The public comment period on the draft permit began on December 26, 2013 and closed on January 27, 2014. EPA announced the public comment period through a public notice published in the *Deer Park Broadcaster* on December 26, 2013 and on Region 6's website. EPA also notified agencies and municipalities on December 23, 2013 in accordance with 40 CFR Part 124.

Revisions in Final Permit

The following is a list of administrative and clarifying changes for the *Rohm and Haas Incorporated, Deer Park (PSD-TX-1320-GHG) Prevention of Significant Deterioration Permit, Final Permit Conditions*.

1. Cover Sheet

The cover sheet title "Prevention of Significant Deterioration Permit for Greenhouse Gas Emissions Issued Pursuant to the Requirements at 40 CFR § 52.21" has been modified to state the following:

In accordance with 40 CFR § 124.15(b)(3), this PSD Permit becomes effective 30 days after the service of notice of this final decision unless review is requested on the permit pursuant to 40 CFR § 124.19 immediately upon issuance of this final decision.

This administrative change is made as a result of not receiving any comment during the comment period related to this action.

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Section II. Annual Emission Limits

EPN	Description	GHG Mass Basis		TPY CO ₂ e ^{1,2}	BACT Requirements
			TPY ¹		
BH-2-5	Gas-Fired Steam Boiler	CO ₂	263,916.90	<u>264,131.87</u> 264,120.75	<ul style="list-style-type: none"> 117 lb CO₂/MMBtu on a 12-month rolling basis. See permit conditions III.A.2 and 4.
		CH ₄	3.95		
		N ₂ O	0.39		
BH-2-6	Gas-Fired Steam Boiler	CO ₂	263,916.90	<u>264,131.87</u> 264,120.75	<ul style="list-style-type: none"> 117 lb CO₂/MMBtu on a 12-month rolling basis. See permit conditions III.A.2 and 4.
		CH ₄	3.95		
		N ₂ O	0.39		

EPN	Description	GHG Mass Basis		TPY CO ₂ e ^{1,2}	BACT Requirements
			TPY ¹		
BLR-FUG2	Gas Piping Fugitive Emissions	CO ₂	No Numerical Limit Established ²	No Numerical Limit Established	Implementation of AVO program. See permit condition III.B.
		CH ₄	No Numerical Limit Established ²		
Totals³		CO ₂	527,883.95	528,334.89	
		CH ₄	10.74⁴		
		N ₂ O	0.78		

1. The TPY emission limits specified in this table are not to be exceeded for this facility and include emissions from the facility during all operations and include MSS activities.
2. Global Warming Potentials (GWP): CH₄ = 2125, N₂O = 310298. ~~On January 1, 2014, EPA anticipates the GWP for CH₄ will change from 21 to 25. This change will impact the CO₂e calculations and the currently proposed emission limits will be revised to reflect the new CH₄ GWP in the final permit.~~
3. Fugitive process emissions from EPN BLR-FUG2 are estimated to be 0.15 TPY of CO₂ and 2.84 TPY of CH₄. In lieu of an emission limit, the emissions will be limited by implementing a design/work practice standard as specified in the permit.
4. Total emissions include the PTE for fugitive emissions. Totals are given for informational purposes only and do not constitute emission limits.

On November 29, 2013, the Global Warming Potentials (GWP) contained in the Greenhouse Gas Regulations, 40 CFR Part 98, Subpart A, Table A-1 was revised for CH₄ and N₂O. The Annual Emission Limits are changed to reflect the revised GWP for CH₄ and N₂O.

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Section III.A.2.b

The Permittee shall calculate, on a daily basis, the amount of CO₂e emitted from each boiler in tons per year based on the measurement of the CO₂ CEMS and the procedures and Global Warming Potentials (GWP) contained in the Greenhouse Gas Regulations, 40 CFR Part 98, Subpart A, Table A-1, as published on November 29, 2013 (78 FR 71904) ~~October 30, 2009 (74 FR 56395)~~ for CH₄ and N₂O. Compliance shall be based on a 12-month rolling basis.

On November 29, 2013, the Global Warming Potentials (GWP) contained in the Greenhouse Gas Regulations, 40 CFR Part 98, Subpart A, Table A-1 was revised for CH₄ and N₂O. The Annual Emission Limits are changed to reflect the revised GWP for CH₄ and N₂O.

National Historic Preservation Act (NHPA)

On December 24, 2013, EPA sent a letter to the State Historic Preservation Officer (SHPO) requesting concurrence on EPA findings for Rohm and Haas' cultural survey. The SHPO sent a letter with concurrence to the EPA on January 27, 2014.