From: Bass, Monique (MN)
To: Magee, Melanie
Cc: Williams, Linda Me
Subject: RE: Rohm And Haas GHG Application Submittal
Date: Thursday, September 26, 2013 5:03:59 PM

Melanie,

The TCEQ is in the process of issuing the public notice package for this permit application as we have completed an initial draft permit review. Included below is a section of the text that was provided within the TCEQ's review regarding PSD applicability. Let me know if you need additional information.

I. Emissions

Emission sources for the proposed project consist of the two boilers and equipment fugitives. The site is located in a nonattainment (NA) county and is an existing major source. The project results in emission increases in NO_x, carbon monoxide (CO), particulate matter, including particulate matter 10 microns in diameter or less and 2.5 microns in diameter or less ($PM/PM_{10}/PM_{2.5}$), sulfur dioxide (SO_2), and sulfuric acid (H_2SO_4); therefore, a Prevention of Significant Deterioration (PSD) and NA major modification significance analysis was required. After netting, the NO_x, VOC, and SO_2 were below the PSD and NA major modification triggers; therefore, neither a PSD nor a NA review was required for these pollutants. The CO and $PM/PM_{10}/PM_{2.5}$ were above the PSD major modification triggers; therefore, a PSD review is required for these pollutants.

II. Federal Applicability

The RH Texas Deer Park Energy Center is located in Harris County which is a severe non-attainment county. The site is currently considered to be a named major stationary source with respect to the PSD program. The new project will have the potential to emit emissions greater than the major modification significance level for the pollutants identified below. The following charts illustrate the annual project emissions for each pollutant and whether this project triggers a PSD or NA review. These totals include MSS emissions.

Thank you,

Monique Bass
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From: Magee, Melanie [mailto:Magee.Melanie@epa.gov]
Sent: Thursday, September 26, 2013 9:25 AM
To: Williams, Linda Me; Bass, Monique (MN)
Subject: RE: Rohm And Haas GHG Application Submittal

Monique and Linda:

I was double checking the status of the TCEQ permit associated with the Rohm and Haas, Boiler House project and noticed on TCEQ's website the project is listed as PSD (see attached pdf)? I

understand from your response you submitted a NNSR netting analysis and NSR permit application to TCEQ? Could you help me understand the permitting status of your Non-GHG emissions associated with this project? This will be used in the applicability section of the Statement of Basis.

Thanks, Melanie

Melanie Magee
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