

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS TX 75202-2733

SEP 13 2011

Mr. Daniel Lutz  
Environmental Compliance Advisor  
INEOS USA LLC  
P.O. Box 1488  
Alvin, TX 77512-1488

RE: INEOS USA LLC, Application for a Greenhouse Gas Prevention of Significant Deterioration Permit

Dear Mr. Lutz:

This letter is in response to your application dated July 28, 2011, and received by this office on August 1, 2011, for a Greenhouse Gas Prevention of Significant Deterioration permit. After our initial review of the above application and all supporting information, we have determined that it is incomplete and additional information is necessary in order to begin the processing of the application. Enclosed is a list of the information required.

Upon a completeness determination, the next step is for the U.S. Environmental Protection Agency (EPA) to develop a preliminary determination and draft permit. As we develop our preliminary determination, it may be necessary for the EPA to request additional clarifying or supporting information. If the supporting information substantially changes the original scope of the permit application, an amendment or new application may be required.

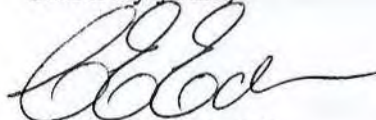
Additionally, in a letter dated August 10, 2011, the EPA requested a substantiation of the confidentiality claims submitted with your permit application dated July 28, 2011. In the referenced letter, the EPA has requested that you provide a justification to support your confidentiality claim. Please be aware that the failure to submit your confidentiality justification may be regarded as a waiver of your confidentiality of your claim, and the EPA may release the information per 40 CFR Part 2, Subpart B.

Although not required as part of our completeness determination, the EPA may not issue a permit without determining that there will be no effects on endangered species or until it has completed consultation under Section 7 of the Endangered Species Act. In addition, the EPA must undergo consultation pursuant to Section 106 of the National Historic Preservation Act. To expedite these consultations, the EPA requests that permit applicants provide a Biological

Assessment and a cultural resources report covering the project and action area. So that the EPA may issue a permit at the earliest possible time and within the timeframes required by statute, we request that you submit this information as early as possible in the process.

If you have any questions concerning the review of your application, please contact Melanie Magee of my staff at (214) 665-7161.

Sincerely yours,



Carl E. Edlund, P.E.

Director

Multimedia Planning and  
Permitting Division

cc: Mr. Richard Hyde, P.E.  
Deputy Director, Office of Permitting and Registration  
Texas Commission on Environmental Quality  
Mr. Steve Hagle, P.E.  
Director, Air Permits Division  
Texas Commission on Environmental Quality



## ENCLOSURE

### EPA Completeness Comments on the INEOS USA LLC Greenhouse Gas Permit Application Dated July 28, 2011

1. The permit application provides a brief explanation of why Carbon Capture and Sequestration was determined to not be a “technically, economically, or commercially viable control option for this project.” Please provide additional information to support this analysis, i.e., a detailed cost analysis for capture, transport and storage.
2. The permit application provides a short-term pound per hour limitation for the emission units in Table 1(a). However, it is not clear if the short term limits are intended as a Best Available Control Technology (BACT) limit that will be met at all times, including start-up and shutdown. Please provide us with a verification that the emission limitations provided in Table 1(a) are being proposed by INEOS as a BACT limitation for all emission unit operation scenarios.
3. For the cracking furnace, the application proposes undefined design standards and general work practice limitations (i.e., “INEOS will select energy-efficient technologies which result in fewer overall emission of all air pollutants per unit of energy produced.”) Please indicate what is meant by “energy-efficient technologies.” For the Decoking BACT discussion, the permit application noted that you plan to minimize the number and duration of decoking and the decoking is proposed to be performed periodically to improve heat transfer through the coils. Please provide additional information to clarify when decoking will be performed, including time, duration limitations, and the technical basis supporting this information in your application.
4. Please provide performance benchmarking data or any other technical support information for the new furnace unit that details the best engineering design and latest technology to ensure energy efficiency as noted on page 14.
5. On page 19 of the application, the Texas Commission on Environmental Quality’s (TCEQ) 28LAER is proposed to be used to control Greenhouse Gas fugitive emissions. For the permitting record, please provide additional information related to the TCEQ’s 28LAER and the technical basis/justification to propose its use.
6. On page 19 of the permit application, an impact analysis discussion is provided. However, Section 52.21(o), Additional Impact Analyses, requires an applicant to provide an analysis of the impairment to the soils and vegetation that would occur as a result of the modification. Please provide the assessment you are providing to the TCEQ.