

US EPA ARCHIVE DOCUMENT

**Unofficial Redline/Sstrikeout**

The following is an administrative change for the *Occidental Chemical Corporation, Ingleside Chemical Plant (PSD-TX-1292-GHG) Prevention of Significant Deterioration Permit, Final Permit Conditions.*

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Section II titled “Annual Facility Emission Limits” has been modified to reflect the change in Global Warming Potentials as published on November 29, 2013 in the Federal Register (78 FR 71904) and is effective for all permits issued on or after January 1, 2014. The methane value was increased from 21 to 25 (times more potent than CO<sub>2</sub>), the N<sub>2</sub>O value was decreased from 310 to 298 and the SF<sub>6</sub> value decreased from 23,900 to 22,800.

Table 1. Facility Emission Limits was revised as shown below.

**Table 1. Facility Emission Limits<sup>1</sup>**

FIN	EPN	Description	GHG Mass Basis		TPY CO <sub>2</sub> e <sup>2,3</sup>	BACT Requirements
				TPY <sup>2</sup>		
NGL-1	NGL-1	Thermal Oxidizer	CO <sub>2</sub>	41,450	<del>41,577</del> 41,579	Minimum firebox temperature of 1,400 °F with Flue gas exhaust < 550°F on a 365-day rolling average basis. See permit condition III.A.1.h. - i.
			CH <sub>4</sub>	1.6		
			N <sub>2</sub> O	0.3		
NGL-2	NGL-2	Thermal Oxidizer	CO <sub>2</sub>	41,450	<del>41,577</del> 41,579	Minimum firebox temperature of 1,400 °F with Flue gas exhaust < 550°F on a 365-day rolling average basis. See permit condition III.A.1.h. - i.
			CH <sub>4</sub>	1.6		
			N <sub>2</sub> O	0.3		
NGL-3	NGL-3	NGL Emergency Flare	CO <sub>2</sub>	1,000	1,000	Flare will meet the requirements of 40 CFR 60.18. See permit condition III.A.2.g.
			CH <sub>4</sub>	No Numerical Limit Established <sup>4</sup>		
			N <sub>2</sub> O	No Numerical Limit Established <sup>4</sup>		
NGL-4	NGL-4	NGL Cooling Tower	CO <sub>2</sub>	208	208	Monitor the feed water and make-up water. See permit condition III.A.3.b. through d.
NGL-5	NGL-5	NGL Process Area Fugitives	CO <sub>2</sub>	No Numerical Limit Established <sup>5</sup>	No Numerical Limit Established <sup>5</sup>	Implementation of LDAR Program. See permit condition III.A.4.c.
			CH <sub>4</sub>	No Numerical Limit Established <sup>5</sup>		
NGL-10	NGL-10	Emergency Generator Engine	CO <sub>2</sub>	34	34	Good combustion practices. See permit conditions III.A.5.b. and III.A.5.d - f.
			CH <sub>4</sub>	No Numerical Limit Established <sup>4</sup>		
			N <sub>2</sub> O	No Numerical Limit Established <sup>4</sup>		
NGL-11 NGL-12 NGL-13 NGL-14	NGL-11 NGL-12 NGL-13 NGL-14	Firewater Pump Engines	CO <sub>2</sub>	16 <sup>6</sup>	64 <sup>6</sup>	Good combustion practices. See permit conditions III.A.5.c. through f.
CH <sub>4</sub>	No Numerical Limit Established <sup>4,6</sup>					
N <sub>2</sub> O	No Numerical Limit Established <sup>4,6</sup>					
<b>Totals<sup>7</sup></b>			CO <sub>2</sub>	<b>84,206</b>	<b>CO<sub>2</sub>e</b> <b>84,468</b> <b>84,473</b>	
			CH <sub>4</sub>	<b>3.6</b>		
			N <sub>2</sub> O	<b>0.6</b>		

1. Compliance with the annual emission limits (tons per year) is based on a 12-month rolling basis.
2. 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, including MSS activities.
3. Global Warming Potentials (GWP): CH<sub>4</sub> = ~~24~~ 25, N<sub>2</sub>O = ~~340~~ 298
4. No numerical limit is established as the estimated emissions are less than 0.01 TPY with appropriate rounding. The emission limit will be a design/work practice standard as specified in the permit.
5. Fugitive process emissions from EPN NGL-5 are estimated to be 0.43 TPY CO<sub>2</sub>, 0.36 TPY of CH<sub>4</sub> and 9.4 TPY CO<sub>2</sub>e. The emission limit will be a design/work practice standard as specified in the permit.
6. The GHG mass basis TPY value is for each firewater pump engine. The CO<sub>2</sub>e TPY limit is for all 4 combined.
7. The total emissions for CH<sub>4</sub> and CO<sub>2</sub>e include the PTE for process fugitive emissions of CH<sub>4</sub>. These totals are given for informational purposes only and do not constitute emission limits.

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