Taminco Pace Plant – Summary of Emission Unit (EU) Updates for 1130004-018-AV

EU No.	Current EU Description	Revised or New EU Description	Remove/ Retire EU	Add EU	Update EU Desc	Emission Factor Update/ Other	Reason/Explanation for EU Update
001	Riley Stoker Boiler					√	Emission factor updates for NOx from natural gas firing, PM and metals for waste oil, and VOC/HAP for process gas firing. In addition, reconciliation of maximum fuel firing rates.
003	B & W Boiler					√	VOC/HAP emission factor updates for process gas firing. In addition, reconciliation of maximum fuel firing rates.
005	Amines Plants Flare					√	VOC/HAP emission factor updates for process gas firing.
006	Methylamines No. 1 Plant Gas-Fired Heater						No Updates Proposed
007	Higher Amines Plant Gas-Fired Heater						No Updates Proposed
028	Methanol Loading Scrubber		√				Methanol is no longer loaded from this facility; therefore please remove/retire this EU.
029	Three Methanol Storage Tanks	Methylamines Plants Nos. 1 and 4 Group 1 HON Storage Tanks			√		The methanol storage tanks are assigned to the Methylamines plants chemical manufacturing process unit (CMPU) under HON. The Group 1 Tanks are the methanol storage tanks: TK-53401B, TK-53405, and TK-53407
031	Methanol Storage HON Equipment Leaks		√				HON Equipment leak requirements are consolidated for each CMPU. Since the methanol storage tanks are part of the Methylamines CMPU, these requirements are already included in EU #036. Therefore, please remove/retire this EU.
033	Methylamines Plant No. 4 Process Vents						No Updates Proposed

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034	Methylamines Plant No. 4 Wastewater					√	Please note that current EUs for individual plant wastewater are for regulatory purposes only and emissions from all wastewater have been included under proposed EU#075 (Wastewater Treatment Plant Fugitives). The wastewater stream covered under HON includes the #4 Dehydration Column Bottoms.
035	Methylamines Plant No. 4 HON Maintenance Wastewater					√	The facility is proposing an updated estimate of emissions during clearing methanol equipment for mechanical work from the No. 4 Plant.
036	Methylamines Plant No. 4 HON Equipment Leaks	Methylamines Plants Nos. 1 and 4 HON Equipment Leaks			√	√	HON Equipment leak requirements are consolidated for each CMPU. Since the methanol storage tank and Nos. 1 and 4 Methylamines plants are part of the Methylamines CMPU, the regulatory requirements are requested to be consolidated in EU #036. Note that we are also requesting to consolidate all fugitive equipment leaks emissions in EU#062.
037	Methylamines Plant No. 4 VOC Equipment Leaks					√	We request to consolidate all fugitive equipment leaks emissions in EU#062
046	Sitewide HON Heat Exchangers					√	Based on the revised HON analysis, the following heat exchangers could have 5% or more HAP: E-671119, E-67119, and E-67037.
047	Methanol Storage HON Maintenance Wastewater					√	The facility is proposing an updated estimate of emissions during clearing methanol equipment for mechanical work from the methanol storage area.
048	Methanol Storage Sample Points	Methylamines Plants Sample Points			√		Change the name since the methanol storage tanks are now part of the Methylamines Plant CMPU.
049	Methylamines Plant No. 1 Process Vents						No Updates Proposed

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050	Methylamines Plant No. 1 Wastewater					√	Please note that current EUs for individual plant wastewater are for regulatory purposes only and emissions from all wastewater have been included under proposed EU#075 (Wastewater Treatment Plant Fugitives).
051	Methylamines Plant No. 1 HON Maintenance Wastewater					√	The facility is proposing an updated estimate of emissions during clearing methanol equipment for mechanical work from the methanol storage area.
052	Methylamines Plant No. 1 HON Equipment Leaks		√				HON Equipment leak requirements are consolidated for each CMPU. Since the methanol storage tank and Nos. 1 and 4 Methylamines plants are part of the Methylamines CMPU, these requirements are requested to be consolidated in EU #036. Therefore, please remove/retire this EU.
053	Methylamines Plants Nos. 1 and 4 HON Group 2 Storage Tank	Methylamines Plants Nos. 1 and 4 HON Group 2 Storage Tanks		√		√	Based on the revised HON analysis, the following tanks are Group 2 tanks: D-68127, D-68146, and D-67116O, and D-67134B.
054	Methylamines Plant No. 1 NSPS Storage Tanks						No updates proposed. Current Permit includes the following tanks: D-67204E, D-67216A, and D-67216B.
055	72” Batch Distillation Column Process Vents					√	This unit is subject to MON, but not subject to HON.
056	72” Batch Distillation Column HON Maintenance Wastewater	72” Batch Distillation Column MON Maintenance Wastewater			√	√	This unit is subject to MON, but not subject to HON. In addition, the facility is proposing an updated estimate of emissions during clearing equipment for mechanical work.

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057	72” Batch Distillation Column HON Equipment Leaks	Higher Amines and 72” Batch Distillation Column MON Equipment Leaks			√	√	This unit is subject to MON, but not subject to HON. Also, the Higher Amines Plant (#2) is Subject to MON. As MON Equipment leak requirements are consolidated for each CMPU and the Nos. 2 and 3 Plants are part of the same CMPU, the equipment leak requirements are requested to be consolidated in EU #057. Note also that we are requesting to consolidate all fugitive equipment leaks emissions in EU#062.
058	72” Batch Distillation Column HON Group 2 Storage Tanks	Higher Amines and 72” Batch Distillation MON Group 2 Storage Tanks			√	√	This unit is subject to MON, but not subject to HON. Also, the Higher Amines Plant (#2) is Subject to MON. As MON storage tank requirements are consolidated for each CMPU and the Nos. 2 and 3 Plants are part of the same CMPU, the equipment storage tank requirements are requested to be consolidated in EU #058. The Group 2 tanks for Nos. 2 and 3 Plants include: D-68110A, D-68110B, D-68142
059	72” Batch Distillation Column Wastewater					√	Please note that current EUs for individual plant wastewater are for regulatory purposes only and emissions from all wastewater have been included under proposed EU#75 (Wastewater Treatment Plant Fugitives).
060	Methylamines Plant No. 4 Gas-Fired Heater						No Updates Proposed
062	Facility-Wide Non-regulated Fugitives	Facilitywide Equipment Leak Fugitives			√	√	We are clarifying that this EU includes facility-wide equipment leak fugitives and have updated the emission calculation to include facilitywide equipment leaks.
063	Cooling Towers (7) (that do not use chromium-based water treatment chemicals)	Cooling Towers (4) (that do not use chromium-based water treatment chemicals)			√		Taminco Pace Plant operates four (4) cooling towers that are in service and that do not use chromium-based water treatment chemicals. CT-67102, CT-67103, CT-67038, and CT-32000.

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064	Vents		√				The facility no longer operates the Condensate Stripper Vent and Low Concentrator Vent to Barometric Condenser and requests to retire this EU. Therefore, please remove/retire this EU.
065	Storage Tanks		√				Request to remove/retire this EU as all product tanks are vented to the flare and all other tanks are insignificant.
066	72" Batch Distillation Column Group 2 Transfer Rack	Higher Amines and 72" Batch Distillation Column Group 2 MON Transfer Rack			√	√	This unit is subject to MON, but not subject to HON. Also, the Higher Amines Plant (#2) is Subject to MON. As this loading rack is shared between the Nos. 2 and 3 Plants it is requested to consolidate into one EU #066.
067	Higher Amines Plant Equipment Leaks		√				Based on reevaluation of the Amyl Amines project, we believe that the there was an error assigning NSPS Subpart VV applicability to the Higher amines plant. NSPS VV does not apply and we request that this EU be removed/retired.
070		Higher Amines Plant Process Vents		√		√	Based on the revised regulatory analysis, the Higher Amines Plant is subject to MON.
071		Higher Amines Plant MON Maintenance Wastewater		√		√	Based on the revised regulatory analysis, the Higher Amines Plant is subject to MON. Emissions are proposed,
072		Higher Amines Plant MON Wastewater		√		√	Based on the revised regulatory analysis, the Higher Amines Plant is subject to MON. Please note that current EUs for individual plant wastewater are for regulatory purposes only and emissions from all wastewater have been included under proposed EU#075 (Wastewater Treatment Plant Fugitives).
073		Higher Amines and 72" Batch Column MON Group 1 Storage Tanks		√			Based on the revised MON analysis, the following tanks are Group 1 tanks: D-67116K, D-68102, D-68103, D-68106A, D-68106B, D-68109, D-68113, D-69101A, D-69101B, D-69101C, D-69101D, D-69102

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074		Sitewide MON Heat Exchangers		√			Based on the revised MON analysis, the following heat exchanger could have 5% or more HAP: E-69101
075		Wastewater Treatment Plant Fugitives		√		√	Consolidating individual regulated and non-regulated wastewater streams into one source. Used WATER9 Model and site-specific configuration and liquid concentration data.