



Air Products LLC
1435 Pasadena Fwy
Pasadena, TX 77506

April 1, 2021

Matthew Ray
Air Permits Division
Texas Commission on Environmental Quality (TCEQ)
Air Permits Division **MC-163**
P.O. Box 13087
Austin, Texas 78711

AIR PRODUCTS LLC - PASADENA PLANT, RN: 100221324
AIR PERMIT APPLICATION (PROJECT 323012)
STEAM METHANE REFORMER UNIT (PERMIT 27773)

Mr. Matthew Ray:

The purpose of this submittal is to comment on the draft permit for Pasadena NSR Permit 27773 sent on March 25, 2021. We submit the following comments. For convenience, we have highlighted any suggested modifications to special condition.

If you have any questions concerning this submittal, please contact me at (281) 478-3172, grovertb@airproducts.com.

Thank you,

A handwritten signature in black ink that reads "Linda M. Williams".

Linda M. Williams (AECOM Project Manager; linda.me.williams@aecom.com)
On Behalf of Tammy Grover
Lead Environmental Engineer
Air Products LLC
North America Industrial Gases Environmental Team

**Air Products LLC – Steam Methane Reformer Unit
NSR Permit No. 27773 Amendment Response
April 1, 2021**



Prepared for:

*Air Products LLC
1435 Pasadena Fwy
Pasadena, TX 77506*

*Texas Commission on
Environmental Quality Account
Number: HG-0011-L*

*Customer Reference Number:
CN602299257*

*Regulated Entity Number:
RN1002221324*

Prepared by:

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Comments on Draft Permit Sent March 25, 2021

Draft Maximum Emission Rate Table (MAERT)

Air Products has no comments on the updated Maximum Emission Rate Table.

Special Condition 11

We respectfully request that the requirement proposed in Special Condition 22 in the draft permit be included in the existing Special Condition 11 which contains requirements for the EPN SMR-SVENT. Please see the change made below in yellow.

11. *A continuous flow monitor shall provide a record of the vent stream flow from EPN SMR-SVENT. Readings shall be taken at least once every 15 minutes and the average hourly values of the flow shall be recorded each hour. The permit holder shall sample the vent stream annually for VOC and ammonia content.*

The monitor shall be calibrated or have a calibration check performed on an annual basis to insure that the monitor is within $\pm 5.0\%$ accuracy.

The monitor shall operate as required by this section at least 95% of the time when the reformer is operational, averaged over a rolling 12 month period.

Records of the hourly and annual steam flow rate from EPN SMR-SVENT are to be kept to ensure compliance with the emission limits set forth in the MAERT.

Special Condition 22

We respectfully request that the requirement proposed in Special Condition 22 in the draft permit be included in the existing Special Condition 11 which contains requirements for the EPN SMR-SVENT. As a result, please remove draft Special Condition 22. Please see the change made below in yellow.

~~22. *Records of the hourly and annual steam flow rate from EPN SMR-SVENT are to be kept to ensure compliance with the emission limits set forth in the MAERT.*~~

22. *All records required by the conditions of this permit shall be maintained on-site for a minimum of five years after the data are obtained. These records shall be made available to representatives of the TCEQ or any local pollution control program having jurisdiction upon request.*