



May 9, 2022

EPA Headquarters
Via CEDRI

**Re: Notice of Compliance Status
40 CFR 63 Subpart YY (EMACT)
Equistar Chemicals, LP
La Porte Plant – Olefins Unit
La Porte, Harris County
Regulated Entity Number: RN100210319
Customer Reference Number: CN600124705**

To Whom it May Concern:

This Notice of Compliance Status (NOCS) is being submitted as required by Alternative Means of Compliance (AMOC) No. 162 for the QE-1Olefins Process Unit at the Equistar Chemicals La Porte Complex owned and operated by Equistar Chemicals, LP (Equistar). This NOCS is required by 40 Code of Federal Registry 63.1110(a)(4), AMOC 162 and as referenced by the US EPA Consent Decree (Case 4:21-cv-03359 Document 2-1 Effective on 1/19/2022).

The Main Flare (EPN QE8050B) and ARU Flare (EPN: QE3050B) began compliance with EMACT and AMOC 162 on 1/19/2022, the effective date of the Consent Decree. See below for design and compliance information associated with each flare.

EPN	Description	Subpart to Comply With	Design	Compliance Date
QE8050B	Main Flare	Subpart YY	Steam Assisted	1/19/2022
QE3050B	ARU Flare	Subpart YY	Steam Assisted	1/19/2022

See appendices for information associated with the Method 22 observation performed, including the final report, observation period, visible emissions readings, heat content, flow rate, exit velocity and any periods where the pilot flame was absent as required by 40 CFR 63.1100(d)(iv).

Equistar Chemical, LP
1515 Miller Cut-Off Road
La Porte, TX 77571
P.O. Drawer D (77536-1900)

Tel 713.209.7000
Fax 713.209.1440
lyondellbasell.com



If you have any questions or need additional information, contact me at 713.767.1028.

Sincerely,

DocuSigned by:
Talia Sanchez
Talia Sanchez

Environmental Engineer – La Port Complex

Enclosures

Cc:

Texas Commission on Environmental Quality
Office of Air
Air Permits Division, MC-163
Attn : Jesse Chacon
P.O. Box 13087
Austin, Texas 78711-3087
Email: Jesse.Chacon@tceq.texas.gov

Director
Harris County
Pollution Control Services
101 South Richey Ste H
Pasadena, Texas 77506-1023
Email: latrice.babin@pcs.hctx.net


Texas Commission on Environmental Quality
Region 12
Attn : Joseph Doby, Air Section Manager
5425 Polk St, Ste H
Houston TX 77023-1452
Email: Joseph.Doby@tceq.texas.gov,



Appendix A
OP-CRO1

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. Identifying Information		
RN: 100210319	CN: 600124705	Account No.: HG-0770-G
Permit No.: O-2223	Project No.: NA	
Area Name: Olefins Manufacturing Areas	Company Name: Equistar Chemicals, LP	
II. Certification Type <i>(Please mark the appropriate box)</i>		
<input checked="" type="checkbox"/> Responsible Official	<input type="checkbox"/> Duly Authorized Representative	
III. Submittal Type <i>(Please mark the appropriate box) (Only one response can be accepted per form)</i>		
<input type="checkbox"/> SOP/TOP Initial Permit Application	<input type="checkbox"/> Update to Permit Application	
<input type="checkbox"/> GOP Initial Permit Application	<input type="checkbox"/> Permit Revision, Renewal, or Reopening	
<input checked="" type="checkbox"/> Other: <u>EMACT and AMOC 162 Notice of Compliance Status</u>		
IV. Certification of Truth		
This certification does not extend to information which is designated by the TCEQ as information for reference only.		
I, <u>Stephen G. Goff</u> certify that I am the <u>RO</u> <i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i>		
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:		
<i>Note: Enter Either a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>		
Time Period: From _____ to _____ <i>Start Date</i> <i>End Date</i>		
Specific Dates: <u>5/9/2022</u> _____ <i>Date 1</i> <i>Date 2</i> <i>Date 3</i> <i>Date 4</i> <i>Date 5</i> <i>Date 6</i>		
Signature:  _____ Signature Date: <u>5/9/2022</u>		
Title: <u>Plant Manager</u>		



Appendix B Flare Data During Method 22 Observation



Method 22 Data, EPN: QE8050B

Start	End	VE Accumulated Emission Time (min:sec)	NHVvg ^a (btu/scf)	Flow Rate (scfm)	Exit Velocity (fps)	NHVcz ^b (btu/scf)	Periods when pilot flame is absent
4/11/2022 10:00	4/11/2022 10:20	0	831	2,311	1.39	470	none
4/11/2022 10:25	4/11/2022 10:45	0	844	2,323	1.40	478	none
4/11/2022 10:50	4/11/2022 11:10	0	848	2,348	1.41	481	none
4/11/2022 11:15	4/11/2022 11:35	0	848	2,365	1.42	484	none
4/11/2022 11:40	4/11/2022 12:00	0	850	2,405	1.45	491	none
4/11/2022 12:05	4/11/2022 12:25	0	853	2,487	1.50	497	none
Average			846	2,373	1.43	483	

^a Net Heating Value of the vent gas

^b Net Heating Value of the combustion zone



Method 22 Data, EPN: QE3050B

Start	End	VE Accumulated Emission Time (min:sec)	Heat Content (btu/scf)	Flow Rate (scfm)	Exit Velocity (fps)	NHVcz (btu/scf)	Periods when pilot flame is absent
4/11/2022 10:00	4/11/2022 10:20	0	304	122	2.38	715	none
4/11/2022 10:25	4/11/2022 10:45	0	304	122	2.38	715	none
4/11/2022 10:50	4/11/2022 11:10	0	305	123	2.41	715	none
4/11/2022 11:15	4/11/2022 11:35	0	336	147	2.87	718	none
4/11/2022 11:40	4/11/2022 12:00	0	390	180	3.53	744	none
4/11/2022 12:05	4/11/2022 12:25	0	415	191	3.74	767	none
Average			343	147	2.89	729	



Appendix C
Method 22 Observation Notes



EPN:QE8050B Observation Notes

Fugitive or Smoke Emission Inspection			
Outdoor Location			
<i>Lyndell Brussell</i>			
Company	Equistar Chemicals, LP	Observer	Ryan Trant
Location	La Porte, Texas	Affiliation	Element
Company Rep.	Maria Anker	Date	4/11/2022
Sky Conditions	Partly Cloudly	Wind Direction	Southeast
Precipitation	None	Wind Speed	20-25 mph
Industry	Chemical Facility	Process Unit	Olefins-Main Flare
Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.			
Observations			
Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec	
10:00-10:20	20:00	0:00	
Break	5:00		
10:25-10:45	20:00	0:00	
Break	5:00		
10:50-11:10	20:00	0:00	
Break	5:00		
11:15-11:35	20:00	0:00	
Break	5:00		
11:40-12:00	20:00	0:00	
Break	5:00		
12:05-12:25	20:00	0:00	



EPN: QE3050B Observation Notes

Fugitive or Smoke Emission Inspection			
Outdoor Location			
<i>Lyndell Bassett</i>			
Company	Equistar Chemicals, LP	Observer	Ryan Trant
Location	La Porte, Texas	Affiliation	Element
Company Rep.	Maria Anker	Date	4/11/2022
Sky Conditions	Partly Cloudly	Wind Direction	Southeast
Precipitation	None	Wind Speed	20-25 mph
Industry	Chemical Facility	Process Unit	Olefins-ARU Flare
Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.			
Observations			
Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec	
10:00-10:20	20:00	0:00	
Break	5:00		
10:25-10:45	20:00	0:00	
Break	5:00		
10:50-11:10	20:00	0:00	
Break	5:00		
11:15-11:35	20:00	0:00	
Break	5:00		
11:40-12:00	20:00	0:00	
Break	5:00		
12:05-12:25	20:00	0:00	