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Memo

To: ExxonMobil Chemical Company Baytown Olefins Plant Permit File (NSR-8-1-20)

From: Aimee Wilson

Date: August 29, 2013

Subject: Meeting with ExxonMobil and their Counsel

On August 29, 2013, EPA and the applicant had a meeting to discuss technical details relating to comments from Sierra Club during the public notice and comment period for the ExxonMobil Baytown Olefins Plant. The meeting was held at the applicant's request. Attendees were:

EPA: Jeff Robinson, Brian Tomasovic, Aimee Wilson

Winstead PC (applicant's counsel): Rebecca Rentz

ExxonMobil (applicant): Ben Hurst

The meeting started off with a discussion on the possibility of submitting information by ExxonMobil that provided their perspective on the public comments. EPA responded that the applicant could submit material in response to the public comments received by EPA, but that EPA is responsible for developing responses to the comments and that we were not asking them to respond to the public comments. ExxonMobil representatives indicated that they would be convening among themselves after the meeting to decide the format in which they want to provide information to EPA that presents their perspective on the comment. We indicated that any new material submitted would become a part of the permitting record.

The applicant then wanted to discuss the comments from Sierra Club individually.

Comment A of the Sierra Club letter was discussed first. ExxonMobil stated Sierra Club incorrectly calculated the lb of CO₂/lb of ethylene for the Baytown Olefins Plant and that they would be willing to provide the calculation. The applicant also stated that the Baytown facility should not be compared to INEOS since the INEOS facility has a flare and was adding only 1 furnace to their existing plant instead of 8 furnaces like ExxonMobil Baytown.

Comment B was then discussed. ExxonMobil stated that Sierra Club incorrectly calculated the specific energy consumption (SEC) for the Baytown Olefins Plant. The applicant stated that using application data would result in a value that may not be the same as the actual operating parameters of the plant once constructed. The applicant also stated they do not think SEC is an appropriate metric for comparing facilities. The applicant also stated that the October 2012 response to EPA contains all the data needed to show that the plant design is energy efficient. ExxonMobil also stated they had reviewed the document "Energy Efficiency Improvement and Cost Saving Opportunities for the Petrochemical Industry", June 2008, Lawrence Berkley Lab

Report LBNL-964E. The applicant stated they could provide a document identifying which measures they are implementing at the Baytown Olefins Plant.

Comment C regarding Carbon Capture and Storage was discussed briefly. ExxonMobil stated they had not prepared anything to discuss. EPA stated they had a question on the \$735,400,000 value given in the October 2012 response on page 23. EPA asked that ExxonMobil provide clarification information on this number as it was presented in the permit application.. EPA also stated that ExxonMobil may want to consider providing information on the project cost without CCS.

Comment D was discussed. EPA stated that a review of the application may be needed to ensure downstream units are affected units. . EPA would also look at other permits issued in Region 6 that discussed “affected” units.

Comment E was briefly discussed. EPA stated that a an additional review of leakless technology may be needed by EPA.

ExxonMobil stated they were not prepared to discuss Comment F.

Comment G was only briefly discussed. ExxonMobil stated that the information submitted following their review of the draft permit and SOB clearly stated their position on the operating conditions that were revised and no longer matched the initial application.