

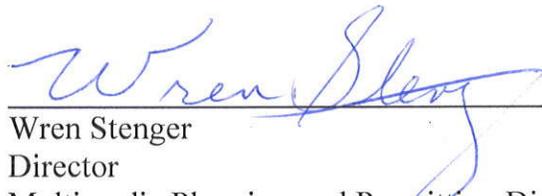
BEFORE THE ENVIRONMENTAL APPEALS BOARD
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.

_____))
In re:))
ExxonMobil Chemical Company)) Appeal No. PSD 13-11
Baytown Olefins Plant))
_____))
PSD Permit No. PSD-TX-102982-GHG))
_____))

CERTIFIED INDEX TO THE ADMINISTRATIVE RECORD

I, Wren Stenger, am the Director of the Multimedia Planning and Permitting Division for U.S. EPA Region 6 ("Region 6"). I hereby certify to the best of my knowledge that the attached index lists the documents that constitute the administrative record required by 40 CFR § 124.18 for the final Greenhouse Gas Prevention of Significant Deterioration permit issued by Region 6 to ExxonMobil Chemical Company Baytown Olefins Plant which is the subject of the above-captioned petition for review.

In witness whereof, I have signed my name this 6th day of January, 2014 at Dallas, Texas.



Wren Stenger
Director
Multimedia Planning and Permitting Division
EPA Region 6, Dallas, Texas

United States Environmental Protection Agency

Administrative Record Index – December 2013

ExxonMobil Baytown Olefins Plant (EMBOP)

PSD Permit (PSD-TX-102982-GHG)

Index #	Record Section or Item	Date of Item
I. PSD Permit Application and Related Documents		
I.01	Letter from ExxonMobil Chemical Company (ExxonMobil) (Jeffrey Kovacs) to EPA (Jeff Robinson) initially submitting GHG PSD Application	05/21/2012
I.02	Letter from EPA (Carl Edlund) to ExxonMobil (Jeffrey Kovacs) with determination of application incompleteness	06/29/2012
I.03	Letter from ExxonMobil (Jeffrey Kovacs) to EPA (Carl Edlund) responding to determination of application incompleteness and providing additional information	10/16/2012
I.04	Email from EPA (Erica LeDoux) to Zephyr (Larry Moon) requesting additional information	11/13/2012
I.05	Email from ExxonMobil (Benjamin Hurst) to EPA (Erica LeDoux) providing additional information by an email attachment	11/14/2012
I.06	Email from EPA (Aimee Wilson) to ExxonMobil (Benjamin Hurst) requesting additional information	01/29/2013
I.07	Email from ExxonMobil (Benjamin Hurst) to EPA (Aimee Wilson) providing additional information by an email attachment	01/31/2013
I.08	Email from EPA (Aimee Wilson) to ExxonMobil (Benjamin Hurst) requesting information on the firing rate of the furnaces and duct burners	02/04/2013
I.09	Email from ExxonMobil (Benjamin Hurst) to EPA (Aimee Wilson) providing additional information on the firing rates of the furnaces and duct burners	02/04/2013
I.10	Email from EPA (Aimee Wilson) to ExxonMobil (Gary Robbins) requesting additional information	02/06/2013
I.11	Email from ExxonMobil (Gary Robbins) to EPA (Aimee Wilson) providing additional information in an email attachment	02/07/2013
I.12	Email from ExxonMobil (Gary Robbins) to EPA (Aimee Wilson) providing additional information on Carbon Capture and Sequestration	02/08/2013
I.13	Email from ExxonMobil (Benjamin Hurst) to EPA (Aimee Wilson) providing application process diagram in an email attachment	02/14/2013
I.14	Email from ExxonMobil (Benjamin Hurst) to EPA (Aimee Wilson) providing additional information in an email attachment	05/03/2013
I.15	Letter from EPA (Carl Edlund) to ExxonMobil (Jeff Kovacs) determining the application for the Baytown Olefins Plant to be complete	06/29/2013
I.16	Email from ExxonMobil (Benjamin Hurst) to EPA (Aimee Wilson) providing additional information in an email attachment	09/02/2013
I.17	Email from ExxonMobil (Benjamin Hurst) to EPA (Aimee Wilson) providing additional information in an email attachment	09/06/2013
I.18	Email from ExxonMobil (Benjamin Hurst) to EPA (Jeff Robinson) providing additional information in an email attachment	09/20/2013
I.19	Email from ExxonMobil (Benjamin Hurst) to EPA (Aimee Wilson) providing additional information in an email attachment	09/27/2013
I.20	Email from Zephyr (Larry Moon) to EPA (Aimee Wilson) correcting and clarifying the annual startup emissions for the GE7FA turbine	10/29/2013
II. Biological Assessment and Cultural Report and Related Documents		
II.01	Letter from ExxonMobil (Gary Robbins) to EPA (Jeff Robinson) initially submitting a draft Biological Assessment and draft Cultural Resources Report	12/14/2012

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ExxonMobil Baytown Olefins Plant (EMBOP)

PSD Permit (PSD-TX-102982-GHG)

Index #	Record Section or Item	Date of Item
II.02	Email from Raven Environmental (Carrie Ross) to EPA (Alfred Dumauual) providing a list of contacts for Non-Federal Representative Letters	01/11/2013
II.03	Letter from ExxonMobil (Gary Robbins) to EPA (Jeff Robinson) providing a supplement to the initial Biological Assessment	02/22/2013
II.04	Email from ExxonMobil (Gary Robbins) to EPA (Alfred Dumauual) providing updated list of persons needing a Non-Federal Representative Letter	03/01/2013
II.05	Email from ExxonMobil (Gary Robbins) to EPA (Alfred Dumauual) submitting Final Cultural Resources Report	04/08/2013
II.06	Letter from EPA (Jeff Robinson) to 27 Tribes with historical interests in Texas providing National Historic Preservation Act Section 106 consultation opportunity	04/09/2013
II.07	Letter from The Delaware Nation (Tamara Fourkiller) to EPA (Jeff Robinson) indicating the tribe does not have any comments nor do they request consultation	04/22/2013
II.08	Letter from ExxonMobil (Jeff Kovacs) to EPA (Jeff Robinson) providing an update to the Biological Assessment	05/10/2013
II.09	Email from ExxonMobil (Gary Robbins) to EPA (Alfred Dumauual) providing information on wastewater	04/18/2013
II.10	Final Biological Assessment	05/20/2013
II.11	Final Essential Fish Habitat Assessment	05/21/2013
II.12	Letter from EPA (Jeff Robinson) to Texas Historical Commission (Mark Wolfe) requesting concurrence on affect determination under the National Historic Preservation Act (NHPA)	06/21/2013
II.13	Response from Texas Historical Commission (William Martin) to EPA (Jeff Robinson) concurring on the no affect determination	07/11/2013
III. GHG PSD Proposed Permit and Related Documents		
III.01	Copy of notice from Baytown Sun newspaper – Publication of Public Notice	06/07/2013
III.02	Proposed Permit	06/07/2013
III.03	Statement of Basis	06/07/2013
III.04	Public Notice	06/07/2013
III.05	Notice of hearing cancelation posted at http://yosemite.epa.gov/r6/Apermit.nsf/AirP (last accessed on 12/16/2013)	07/03/2013
IV. Public Comments and Related Documents		
IV.01	Email from Sierra Club (Travis Ritchie) to EPA (Aimee Wilson) submitting comments on the draft permit for ExxonMobil Baytown Olefins Plant including link to download 22 supporting documents	07/08/2013
IV.02	Email from EPA (Aimee Wilson) to ExxonMobil (Benjamin Hurst) informing them that comments were received during the comment period	07/09/2013
V. Final PSD Permit and Related Documents		
V.01	Final GHG PSD Permit	11/25/2013
V.02	Response to Public Comments	11/25/2013
V.03	Transmittal Letter	11/25/2013
V.04	Final PSD Permit Notice	11/25/2013
V.05	Email to Sierra Club announcing permit decision	11/25/2013
VI. Other Correspondence and Miscellaneous Documents		
VI.01	“PSD and Title V Permitting Guidance for Greenhouse Gases”, EPA-457/B-11-001, March 2011. http://www.epa.gov/nsr/ghgdocs/ghgpermittingguidance.pdf	

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ExxonMobil Baytown Olefins Plant (EMBOP)

PSD Permit (PSD-TX-102982-GHG)

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VI.02	“Ethylene Production” Technip. http://www.technip.com/sites/default/files/technip/publications/attachments/Ethylene_October_2012_9.pdf	
VI.03	Williams Olefins, Geismar Ethylene Plant Expansion Project (Agency Interest Number 5565, activity number PER20110004). http://edms.deq.louisiana.gov/app/doc/querydef.aspx	
VI.04	“Energy Efficiency Improvement and Cost Savings Opportunities for the Petrochemical Industry”, Energy Star; 2008. http://www.energystar.gov/ia/business/industry/Petrochemical_Industry.pdf?28f1-c5cb	
VI.05	“New Source Review Workshop Manual” EPA; 1990. http://www.epa.gov/ttn/nsr/gen/wkshpman.pdf	
VI.06	“EPA Air Pollution Control Cost Manual”, EPA; January 2002. http://www.epa.gov/ttn/catc1/dir1/c_allchs.pdf	
VI.07	“Regulatory Impact Analysis for the Proposed Standards of Performance for Greenhouse Gas Emissions for New Stationary Sources: Electric Utility Generating Units” EPA; September 2013. http://www.epa.gov/ttnecas1/regdata/RIAs/EGUGHGNewSourceStandardsRIA.pdf	
VI.08	“Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act”, Federal Register; 74 FR 66496, December 15, 2009. http://www.gpo.gov/fdsys/pkg/FR-2009-12-15/pdf/E9-29537.pdf	
VI.09	“Cost and Performance Baseline for Fossil Energy Power Plants, Volume 1: Bituminous Coal and Natural Gas to Electricity”, NETL; November 2010, Rev September 2013. http://www.netl.doe.gov/energy-analyses/baseline_studies.html	
VI.10	Chevron Phillips Cedar Bayou GHG PSD Application Revision. http://www.epa.gov/earth1r6/6pd/air/pd-r/ghg/chevron_response031912.pdf	
VI.11	In Re Hillman Power Company, L.L.C. PSD Appeal Nos. 02-04, 02-05, and 02-06 Order Denying Review; July 31, 2002. http://www.epa.gov/eab/disk11/hillman.pdf	
VI.12	“Energy Efficiency and Innovative Emerging Technologies for Olefin Production” Tao Ren, et al; Utrecht University Department of Science, Technology and Society. http://www.umweltbundesamt.at/fileadmin/site/umweltthemen/industrie/IPPC_Konferenz/ren.pdf	
VI.13	“Energy Use and Energy Intensity of the U.S. Chemical Industry” Ernst Worrell, et al., Ernest Orlando Lawrence Berkley National Laboratory, Environmental Energy Technologies Division, April 2000. http://www.energystar.gov/ia/business/industry/industrial_LBNL-44314.pdf	
VI.14	“Olefins from Conventional and Heavy Feedstocks: Energy Use in Steam Cracking and Alternative Processes” Tao Ren, et al., June 2004.	
VI.15	Ethylene – Encyclopedia of Chemical Technology.	
VI.16	Memo of Meeting with ExxonMobil Representatives on July 24, 2013	
VI.17	Memo of Meeting with ExxonMobil Representatives on August 21, 2013	
VI.18	Memo of Meeting with ExxonMobil Representatives on August 28, 2013	
VI.19	Memo of Meeting with ExxonMobil Representatives on September 12, 2013	

CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of **EPA REGION 6'S CERTIFIED INDEX TO THE ADMINISTRATIVE RECORD** in the matter of ExxonMobil Chemical Company Baytown Olefins Plant, EAB Appeal No. PSD 13-11 to be served upon the persons listed below. Pursuant to 40 C.F.R. 124.19(i)(3), the parties reached an agreement to accept service by electronic means.

Dated: January 15, 2014

/S/ Joshua Olszewski

Joshua Olszewski

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