

Tony Lentini  
Manager, Safety & Environmental  
DELTA TUBULAR PROCESSING  
9393 Sheldon Road  
Houston, Texas 77049

Re: Natural Gas-Fired Furnaces  
Houston, Harris County

Dear Tony Lentini:

This is in response to your letter dated May 15, 1995 and the additional information you submitted in support of exempting the furnaces at your facility on Sheldon Road, Houston, Harris County. We understand there are 16 furnaces at your facility: one rated at 36.0 million British thermal unit per hour (MMBtu/hr) (Emission Point No. [EPN] 1), two at 7.95 MMBtu/hr (EPNs 4 and 5), and thirteen at 2.38 MMBtu/hr (EPN 2). After evaluation of this information and review of past Standard Exemption Lists, we have determined that the furnaces, with the exception of EPN 1, are exempt from permit procedures under Standard Exemption No. 7 as published in the October 19, 1979 Standard Exemption List.

This exemption authorizes combustion units with a rated fuel consumption less than 10,000 standard cubic feet (scf) of gas per hour. Per the process information you have provided, all but one of the furnaces meet this criteria. EPN 1 is described as a heating furnace with a total maximum capacity of 36.0 MMBtu/hr. Assuming a fuel heating value of 1,000 Btu per scf, this equates to a gas flowrate of 36,000 scf. Therefore, we cannot confirm the eligibility of this furnace to claim exemption status.

A copy of the exemption in effect October 19, 1979 is enclosed. You must operate in accordance with the requirements of the enclosed standard exemption. If the rated gas flowrate of EPN 1 is in fact less than 10,000 scf per hour, then no further action is required on your part. Otherwise, you may require a permit or, at minimum, the furnace may have to meet the requirements of the current Standard Exemption No. 7 (copy enclosed).

You are reminded that regardless of whether a permit is required, these facilities must be in compliance with all air quality Rules and Regulations of the TNRCC and of the

U.S. Environmental Protection Agency (EPA) at all times.

If you have any questions concerning this exemption, please contact Mr. Angel Tomasino of our New Source Review Program at (512) 239-1593.

Sincerely,

James E. Crocker, P.E.  
Manager, Combustion Section  
New Source Review Program (MC-162)

cc: Ms. Karen Kilpatrick, Air Program Manager, Houston  
Mr. Rob Barrett, Director, Harris County Pollution  
Control Department, Pasadena