

Statement of Basis of the Federal Operating Permit

Crown Cork & Seal USA, Inc.

Site Name: Crown Cork & Seal Co USA Inc
Area Name: Crown Beverage Packaging Conroe
Physical Location: 2501 N Frazier St
Nearest City: Conroe
County: Montgomery

Permit Number: O1036
Project Type: Renewal

The North American Industry Classification System (NAICS) Code: 332431
NAICS Name: Metal Can Manufacturing

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). Per 30 TAC §§ 122.241 and 243, the permit holder has submitted an application under § 122.134 for permit renewal. This document may include the following information:

- A description of the facility/area process description;
- A basis for applying permit shields;
- A list of the federal regulatory applicability determinations;
- A table listing the determination of applicable requirements;
- A list of the New Source Review Requirements;
- The rationale for periodic monitoring methods selected;
- The rationale for compliance assurance methods selected;
- A compliance status; and
- A list of available unit attribute forms.

Prepared on: May 28, 2021

Operating Permit Basis of Determination

Permit Area Process Description

The facility currently operates three two-piece beverage can manufacturing lines with a swing decorator installed as a fourth decorator with an oven that operates in the same manner as the existing three lines but relegates an existing decorator to a standby function when in operation. Only three lines (3 of 4 decorators) are physically able to produce cans at any given time. Completed two-piece cans are made by forming a single piece aluminum can body and attaching an end to it. End manufacturing is not conducted at this facility.

Beverage can body fabrication involves a draw and iron (D&I) process, after which various coatings are applied and cured. In total, the D&I process involves multiple steps and certain unit operations are shared by more than one line. For example, one can washer will accommodate the can bodies produced by all of the bodymakers on all production lines with one existing smaller washer on standby, and one inside bake oven handles all of the cans from the lacquer spray machines on Lines 1 and 2 while the other shorter IBO oven handles line 3 curing.

The can forming steps begins when a rolled aluminum coil of sheet metal is uncoiled and a copper lubricant (a synthetic lubricant) is spread on the sheet with a roll applicator. The lubricated sheet is fed into a copper press, which stamps out shallow aluminum cups that are approximately 3.75-inch in diameter by 1.5 inches tall. The scrap aluminum left over from the punch press patterns is collected, bailed, and sent for recycling at a secondary aluminum smelter. The copper lubricant has almost no volatility at the temperature in which the process operates, thus negligible evaporative loss occurs and this step is considered to be a trivial emission source.

Cups from the initial can forming step are continuously fed through an extrusion process (bodymakers that draws the can to a smaller diameter (2.75 inches) and irons the walls to the appropriate length (approximately 5 inches). This draw & iron process is facilitated by application of a drawing lubricant aqueous solution, which aids in the reshaping process (lubricating and cooling the aluminum can, and bodymaker dies). This drawing lubricant is a synthetic lubricant that is used in an approximately 3% aqueous solution. Similar to the copper lubricant, the bodymaker synthetic lubricant has negligible volatility at the temperature and aqueous solution concentration in which it is used. Therefore, the bodymakers are also considered to be a trivial emission source.

At the exit of the bodymaker, excess aluminum is trimmed from the top of the can body to level the uneven edge and obtain the desired height of the cans. This trimming operation is completed with a knife-like cutting tool that slices off approximately 1/4-inch of excess aluminum. The can is still enveloped in drawing lubricant, therefore, the de minimis amount of aluminum fines created in this operation are carried away and then filtered from the drawing lubricant. Accordingly, no particulate matter emissions are created by this process step.

Once formed, the can bodies are processed in a can washer to remove any drawing lubricant solution, slightly etch the aluminum surface, and then apply a proprietary surfactant surface treatment (containing no VOC) that improves adhesion of the coatings. The can washer is a multi-stage process where these dilute acid wash and surface treatment aqueous solutions are sprayed on the cans via a series of nozzles within enclosed sections of the washer. Water rinse stages, including a final rinse with deionized water, follow the acidic washes and surfactant surface treatment stages. There are two washers in the plant, the main washer can wash enough cans for the entire plant while the smaller washer can only handle roughly two production lines. The main washer is used exclusively and the standby washer is only put into use if any issues or maintenance is required for the main washer. All heat for the washers is provided by two small on demand boilers at less than 2 MM BTU/hr heat input each.

The can washer stages that spray acidic or surface treatment aqueous solutions are not directly vented to atmosphere. One of the water rinse stages is ventilated, but this exhaust only contains water vapor, and possibly minute amounts of acid fume. The acidic wash solutions contain less than 10% sulfuric acid and less than 0.1% hydrofluoric acid; therefore, the partial pressures of acid fumes from these solutions are negligible. The surface treatment raw material contains 5% to 10% proprietary surfactant and is used in a 3.5% solution strength, so the total surfactant concentration is less than 0.4% by weight. Accordingly, the washing, rinsing and surface treatment stages of the can washer are considered trivial

emission sources. Immediately after the washer, the cans pass through a natural gas-fired dryer. Products of combustion from the dryer burners are vented to atmosphere. The cans exiting the dryer section as "bright cans" and are then conveyed to the rim coater for application of a UV varnish to the bottom rim of the can prior to the decoration process step.

Bright cans from the washer are conveyed to a bottom rim coater where a UV rim varnish is applied with a roll coater. The rim varnish is cured with ultra-violet lamps before the cans proceed to the printing mandrel on the decorator. Most of the organic materials in the rim varnish cross link in the UV curing step and are transformed into the cured coating film on the bottom rim. The VOC emission rate of this UV coating is less than 0.2 lbs/gal. The exterior label and decoration are applied in the first section of the decorators. Inks are transferred from an ink well to a series of rollers and then applied to a rubber printing blanket roll. This printing blanket roll and the cans rotate on a mandrel at the same speed in opposite directions to print the individual color on to the can, which forms the exterior label. Up to 8 colors can be applied by the decorator's printing station. Hundreds of printing inks are applied over the course of the year, but they all have a very similar resin chemistry and composition, with the VOC consisting of glycol ether compounds. Overvarnish is roll coated directly over the inks to provide a protective coating over the printed can label. This is a wet-on-wet coating application operation, with no curing step between the printing and overvarnish application stations on the decorator. Decorated cans are then immediately transferred to a pin chain conveyer and fed to a curing oven. The exhaust from this pin oven is directed to the VOC control device, i.e. the newly installed regenerative thermal oxidizer (RTO). Once the ink and varnish has cured in the printing pin ovens, the cans are ready for the interior coating. The same overvarnish is used for all can production at the site. This is a water-based coating that is received and stored in bulk tanks. No solvents are added to the overvarnish prior to use. If any viscosity adjustment is required, it is accomplished by adding water to the coating, which has no affect emissions and will not change the VOC content of the overvarnish. The current overvarnish VOC content meets both the federal NSPS and state RACT limits applicable to beverage can exterior coatings. These coatings are additionally compliant with 30 TAC 115 before control.

Decorated cans from the pin oven are conveyed into a bank of lacquer spray machines (LSMs) that apply the inside spray coating to the interior of the can. The function of this inside spray coating is to eliminate any contact between the beverage and the aluminum. The inside spray coating is applied with high precision airless spray nozzles positioned within the spinning can. This application technique yields a very high transfer efficiency, which based on a supplier data, is in excess of 94%. The minor amount of overspray generated in this process step is pulled into a ventilation duct under high velocity (over 100 fpm) that directs it to a baghouse to remove dried coating droplets before directing it to the RTO. Very high overspray collection efficiency is achieved by this system, which based on a Crown PM test in another facility, was approximately 97% total capture efficiency before baghouse. Coated cans are conveyed from the LSMs to an in-feed table at the inside bake oven (IBO) where they proceed through this tunnel style oven on an open mesh conveyor to cure the interior coating. The IBO oven exhaust and certain portions of the conveyor system between the LSMs and IBO are vented to the RTO for VOC control.

The same inside spray coating is used for all can production at the site. This is a water-based coating that is received and stored in bulk tanks. No solvents are added to the inside spray prior to use. If any viscosity adjustment is required, it is accomplished by adding water to the coating, which has no affect emissions and will not change the VOC content of the inside spray. The inside spray coating VOC content meets both the federal NSPS and state RACT limits applicable to beverage can interior coatings. These coatings are additionally compliant with 30 TAC 115 before control.

As the final manufacturing step, the top section of the can is necked down to a smaller diameter and flanged to prepare the can to receive the end (lid). The necker machines decrease the diameter of the open end of the can by forcing it through a series of successive dies (one type on each machine). The spin flanger machines form the can shoulder into a smooth, slightly concave transition between the neck and can body and then turns the neck back to create a mating surface for the can end during packaging of the beverage. A Necker lubricant is used in this process, but this material has no VOC as it is comprised of a paraffin wax material. The supplier of this lubricant reports negligible volatility of this material. Therefore, the necker/flanger operation is also considered to be a trivial emission source. Quality control, packaging, and shipping operations follow the manufacturing process.

FOPs at Site

The "application area" consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site,

then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: None

Major Source Pollutants

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	VOC
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Reading State of Texas's Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as "applicable requirements") that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
 - o Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
 - o Additional Monitoring Requirements
 - o New Source Review Authorization Requirements
 - o Compliance Requirements
 - o Protection of Stratosphere Ozone
 - o Permit Location
 - o Permit Shield (30 TAC § 122.148)
- Attachments
 - o Applicable Requirements Summary
 - * Unit Summary
 - * Applicable Requirements Summary
 - o Additional Monitoring Requirements
 - o Permit Shield
 - o New Source Review Authorization References
 - o Compliance Plan
 - o Alternative Requirements
- Appendix A
 - o Acronym list

General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on an OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the "index number," detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table is based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3 for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

Federal Regulatory Applicability Determinations

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	No
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes

40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	No
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	No
CSAPR (Cross-State Air Pollution Rule)	No
Federal Implementation Plan for Regional Haze (Texas SO ₂ Trading Program)	No

Basis for Applying Permit Shields

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

Insignificant Activities and Emission Units

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

De Minimis Sources

1. Sources identified in the "De Minimis Facilities or Sources" list maintained by TCEQ. The list is available at https://www.tceq.texas.gov/permitting/air/newsourcereview/de_minimis.html.

Miscellaneous Sources

2. Office activities such as photocopying, blueprint copying, and photographic processes.
3. Outdoor barbecue pits, campfires, and fireplaces.
4. Storage and handling of sealed portable containers, cylinders, or sealed drums.
5. Vehicle exhaust from maintenance or repair shops.
6. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
7. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
8. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
9. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
10. Well cellars.

11. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
12. Equipment used exclusively for the melting or application of wax.
13. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
14. Battery recharging areas.

Sources Authorized by 30 TAC Chapter 106, Permits by Rule

15. Sources authorized by §106.102: Combustion units designed and used exclusively for comfort heating purposes employing liquid petroleum gas, natural gas, solid wood, or distillate fuel oil.
16. Sources authorized by §106.122: Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
17. Sources authorized by §106.141: Batch mixers with rated capacity of 27 cubic feet or less for mixing cement, sand, aggregate, lime, gypsum, additives, and/or water to produce concrete, grout, stucco, mortar, or other similar products.
18. Sources authorized by §106.143: Wet sand and gravel production facilities that obtain material from subterranean and subaqueous beds where the deposits of sand and gravel are consolidated granular materials resulting from natural disintegration of rock and stone and have a production rate of 500 tons per hour or less.
19. Sources authorized by §106.148: Railcar or truck unloading of wet sand, gravel, aggregate, coal, lignite, and scrap iron or scrap steel (but not including metal ores, metal oxides, battery parts, or fine dry materials) into trucks or other railcars for transportation to other locations.
20. Sources authorized by §106.149: Sand and gravel production facilities that obtain material from deposits of sand and gravel consisting of natural disintegration of rock and stone, provided that crushing or breaking operations are not used and no blasting is conducted to obtain the material.
21. Sources authorized by §106.161: Animal feeding operations which confine animals in numbers specified and any associated on-site feed handling and/or feed millings operations, not including caged laying and caged pullet operations.
22. Sources authorized by §106.162: Livestock auction sales facilities.
23. Sources authorized by §106.163: All animal racing facilities, domestic animal shelters, zoos, and their associated confinement areas, stables, feeding areas, and waste collection and treatment facilities, other than incineration units.
24. Sources authorized by §106.229: Equipment used exclusively for the dyeing or stripping of textiles.
25. Sources authorized by §106.241: Any facility where animals or poultry are slaughtered and prepared for human consumption provided that waste products such as blood, offal, and feathers are stored in such a manner as to prevent the creation of a nuisance condition and these waste products are removed from the premises daily or stored under refrigeration.
26. Sources authorized by §106.242: Equipment used in eating establishments for the purpose of preparing food for human consumption.
27. Sources authorized by §106.243: Smokehouses in which the maximum horizontal inside cross-sectional area does not exceed 100 square feet.
28. Sources authorized by §106.244: Ovens, mixers, blenders, barbecue pits, and cookers if the products are edible and intended for human consumption.
29. Sources authorized by §106.266: Vacuum cleaning systems used exclusively for industrial, commercial, or residential housekeeping purposes.
30. Sources authorized by §106.301: Aqueous fertilizer storage tanks.
31. Sources authorized by §106.313: All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
32. Sources authorized by §106.316: Equipment used for inspection of metal products.
33. Sources authorized by §106.317: Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
34. Sources authorized by §106.318: Die casting machines.
35. Sources authorized by §106.319: Foundry sand mold forming equipment to which no heat is applied.

36. Sources authorized by §106.331: Equipment used exclusively to package pharmaceuticals and cosmetics or to coat pharmaceutical tablets.
37. Sources authorized by §106.333: Equipment used exclusively for the mixing and blending of materials at ambient temperature to make water-based adhesives.
38. Sources authorized by §106.372: Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
39. Sources authorized by §106.391: Presses used for the curing of rubber products and plastic products.
40. Sources authorized by §106.394: Equipment used for compression molding and injection molding of plastics.
41. Sources authorized by §106.414: Equipment used exclusively for the packaging of lubricants or greases.
42. Sources authorized by §106.415: Laundry dryers, extractors, and tumblers used for fabrics cleaned with water solutions of bleach or detergents.
43. Sources authorized by §106.431: Equipment used exclusively to mill or grind coatings and molding compounds where all materials charged are in paste form.
44. Sources authorized by §106.432: Containers, reservoirs, or tanks used exclusively for dipping operations for coating objects with oils, waxes, or greases where no organic solvents, diluents, or thinners are used; or dipping operations for applying coatings of natural or synthetic resins which contain no organic solvents.
45. Sources authorized by §106.451: Blast cleaning equipment using a suspension of abrasives in water.
46. Sources authorized by §106.453: Equipment used for washing or drying products fabricated from metal or glass, provided no volatile organic materials are used in the process and no oil or solid fuel is burned.
47. Sources authorized by §106.471: Equipment used exclusively to store or hold dry natural gas.
48. Sources authorized by §106.531: Sewage treatment facilities, excluding combustion or incineration equipment, land farms, or grease trap waste handling or treatment facilities.

Determination of Applicable Requirements

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at www.tceq.texas.gov/permitting/air/nav/air_supportsys.html. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or, in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*
PUMP ENGINE	40 CFR Part 60, Subpart IIII	60IIII	<p>Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification after 07/11/2005.</p> <p>Exemptions = The CI ICE is not exempt due to national security, testing at an engine test cell/stand or as a temporary replacement.</p> <p>Service = CI ICE is a fire-pump engine, an emergency engine certified to National Fire Protection Association requirements.</p> <p>Commencing = CI ICE was newly constructed after 07/11/2005.</p> <p>Manufacture Date = Date of manufacture was after 07/01/2006.</p> <p>Diesel = Diesel fuel is used.</p> <p>Displacement = Displacement is less than 10 liters per cylinder.</p> <p>Model Year = CI ICE was manufactured in model year 2017 or later.</p> <p>Kilowatts = Power rating is greater than or equal to 37 KW and less than 75 KW.</p> <p>Standards = The emergency CI ICE meets the standards applicable to non-emergency engines.</p> <p>Compliance Option = The CI ICE and control device is installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions.</p>
PUMP ENGINE	40 CFR Part 63, Subpart ZZZZ	63ZZZZ	<p>HAP Source = The site is an area source of hazardous air pollutants as defined in 40 CFR § 63.2</p> <p>Brake HP = Stationary RICE with a brake HP less than 100 HP.</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006.</p>
T-1	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p> <p>Construction Date = On or after May 12, 1973</p> <p>Tank Description = Tank using a submerged fill pipe</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p>
T-1	40 CFR Part 60, Subpart Kb	60Kb-1	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)</p>
T-2	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p> <p>Construction Date = On or after May 12, 1973</p> <p>Tank Description = Tank using a submerged fill pipe</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p>

T-2	40 CFR Part 60, Subpart Kb	60Kb-1	Product Stored = Volatile organic liquid Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)
T-3	30 TAC Chapter 115, Storage of VOCs	R115-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons Construction Date = On or after May 12, 1973 Tank Description = Tank using a submerged fill pipe True Vapor Pressure = True vapor pressure is less than 1.0 psia
T-3	40 CFR Part 60, Subpart Kb	60Kb-1	Product Stored = Volatile organic liquid Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)
T4	30 TAC Chapter 115, Storage of VOCs	R115-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = Other than crude oil, condensate, or VOC Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
T4	40 CFR Part 60, Subpart Kb	60Kb	Product Stored = Waste mixture of indeterminate or variable composition Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)
T5	30 TAC Chapter 115, Storage of VOCs	R115-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = Other than crude oil, condensate, or VOC Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
T5	40 CFR Part 60, Subpart Kb	60Kb	Product Stored = Petroleum liquid (other than petroleum or condensate) Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)
T6	30 TAC Chapter 115, Storage of VOCs	R115-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = Other than crude oil, condensate, or VOC Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
T6	40 CFR Part 60, Subpart Kb	60Kb	Product Stored = Petroleum liquid (other than petroleum or condensate) Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)
T7	30 TAC Chapter 115, Storage of VOCs	R115-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = Other than crude oil, condensate, or VOC Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons

T7	40 CFR Part 60, Subpart Kb	60Kb	Product Stored = Stored product other than volatile organic liquid or petroleum liquid Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)
T8	30 TAC Chapter 115, Storage of VOCs	R115-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = Other than crude oil, condensate, or VOC Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
T8	40 CFR Part 60, Subpart Kb	60Kb	Product Stored = Stored product other than volatile organic liquid or petroleum liquid Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)
SOL-1	30 TAC Chapter 115, Degreasing Processes	R5412-1	Solvent Degreasing Machine Type = Cold solvent cleaning machine. Alternate Control Requirement = The TCEQ Executive Director has not approved an alternative control requirement as allowed under 30 TAC § 115.413 or not alternative has been requested. Solvent Sprayed = A solvent is sprayed. Solvent Vapor Pressure = Solvent vapor pressure is less than or equal to 0.6 psia as measured at 100 degrees Fahrenheit. Solvent Heated = The solvent is heated to a temperature greater than 120 degrees Fahrenheit. Parts Larger than Drainage = No cleaned parts for which the machine is authorized to clean are larger than the internal drainage facility of the machine. Drainage Area = Area is greater than or equal to 16 square inches. Disposal in Enclosed Containers = Waste solvent is properly disposed of in enclosed containers.
GRP-DECO	30 TAC Chapter 115, Surface Coating Operations	R5421	Alternative Compliance Method = No alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria has been approved by the TCEQ Executive Director under 30 TAC § 115.423(2), § 115.423(3)(A) or § 115.423(4). Facility Operations = Can coating VOC Emission Rate = Other uncontrolled emission rates. Vapor Recovery = No vapor recovery system is used to control emissions.
GRP-DECO	40 CFR Part 60, Subpart WW	60WW	Construction/Modification Date = After November 26, 1980. Facility Operations = Over varnish operations are carried out. Capture System/Control Device = Capture system and control device destroys VOC by using a thermal incinerator.
GRP-LSM	30 TAC Chapter 115, Surface Coating Operations	R5421	Alternative Compliance Method = No alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria has been approved by the TCEQ Executive Director under 30 TAC § 115.423(2), § 115.423(3)(A) or § 115.423(4). Facility Operations = Can coating VOC Emission Rate = Other uncontrolled emission rates. Vapor Recovery = No vapor recovery system is used to control emissions.
GRP-LSM	40 CFR Part 60, Subpart WW	60WW	Construction/Modification Date = After November 26, 1980. Facility Operations = Two-piece can inside spray coating operations are carried out. Capture System/Control Device = Capture system and control device destroys VOC by using a thermal incinerator.

PRO-001	30 TAC Chapter 115, Surface Coating Operations	R5421-1	<p>Alternative Compliance Method = No alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria has been approved by the TCEQ Executive Director under 30 TAC § 115.423(2), § 115.423(3)(A) or § 115.423(4).</p> <p>Facility Operations = Can coating</p> <p>VOC Emission Rate = Other uncontrolled emission rates.</p> <p>Vapor Recovery = No vapor recovery system is used to control emissions.</p>
PRO-001	40 CFR Part 60, Subpart WW	60WW-1	<p>Construction/Modification Date = After November 26, 1980.</p> <p>Facility Operations = Over varnish operations are carried out.</p> <p>Capture System/Control Device = Capture system and control device destroys VOC by using a thermal incinerator.</p>
PRO-001	40 CFR Part 60, Subpart WW	60WW-2	<p>Construction/Modification Date = After November 26, 1980.</p> <p>Facility Operations = Two-piece can inside spray coating operations are carried out.</p> <p>Capture System/Control Device = No capture system and control device is used by the affected facility.</p>
PRO-001	40 CFR Part 60, Subpart WW	60WW-3	<p>Construction/Modification Date = After November 26, 1980.</p> <p>Facility Operations = Coating operations other than exterior base coat, exterior clear base coat, over-varnish and two-piece can inside spray coat operations are carried out.</p> <p>Capture System/Control Device = No capture system and control device is used by the affected facility.</p>
PRO-002	30 TAC Chapter 115, Surface Coating Operations	R5421-2	<p>Alternative Compliance Method = No alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria has been approved by the TCEQ Executive Director under 30 TAC § 115.423(2), § 115.423(3)(A) or § 115.423(4).</p> <p>Facility Operations = Can coating</p> <p>VOC Emission Rate = Other uncontrolled emission rates.</p> <p>Vapor Recovery = No vapor recovery system is used to control emissions.</p>
PRO-002	40 CFR Part 60, Subpart WW	60WW-4	<p>Construction/Modification Date = After November 26, 1980.</p> <p>Facility Operations = Over varnish operations are carried out.</p> <p>Capture System/Control Device = Capture system and control device destroys VOC by using a thermal incinerator.</p>
PRO-002	40 CFR Part 60, Subpart WW	60WW-5	<p>Construction/Modification Date = After November 26, 1980.</p> <p>Facility Operations = Two-piece can inside spray coating operations are carried out.</p> <p>Capture System/Control Device = No capture system and control device is used by the affected facility.</p>
PRO-003	30 TAC Chapter 115, Surface Coating Operations	R5421-3	<p>Alternative Compliance Method = No alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria has been approved by the TCEQ Executive Director under 30 TAC § 115.423(2), § 115.423(3)(A) or § 115.423(4).</p> <p>Facility Operations = Can coating</p> <p>VOC Emission Rate = Other uncontrolled emission rates.</p> <p>Vapor Recovery = No vapor recovery system is used to control emissions.</p>

PRO-003	40 CFR Part 60, Subpart WW	60WW-6	<p>Construction/Modification Date = After November 26, 1980.</p> <p>Facility Operations = Over varnish operations are carried out.</p> <p>Capture System/Control Device = Capture system and control device destroys VOC by using a thermal incinerator.</p>
PRO-003	40 CFR Part 60, Subpart WW	60WW-7	<p>Construction/Modification Date = After November 26, 1980.</p> <p>Facility Operations = Two-piece can inside spray coating operations are carried out.</p> <p>Capture System/Control Device = No capture system and control device is used by the affected facility.</p>

* - The "unit attributes" or operating conditions that determine what requirements apply

NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit (FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOPs are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. In addition, many of the permits are accessible online through the link provided below. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. Permit by Rule (PBR) registrations submitted by permittees are also available online through the link provided below. The following table specifies the PBRs that apply to the site.

The status of air permits, applications, and PBR registrations may be found by performing the appropriate search of the databases located at the following website:

www.tceq.texas.gov/permitting/air/nav/air_status_permits.html

Details on how to search the databases are available in the **Obtaining Permit Documents** section below.

New Source Review Authorization References

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits by Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 153679	Issuance Date: 10/29/2018
Authorization No.: 75271	Issuance Date: 07/19/2017
Permits by Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.183	Version No./Date: 09/04/2000

Permits by Rule

The TCEQ has interpreted the emission limits prescribed in 30 TAC §106.4(a) as both emission thresholds and default emission limits. The emission limits in 30 TAC §106.4(a) are all considered applicable to each facility as a threshold matter to ensure that the owner/operator qualifies for the PBR authorization. Those same emission limits are also the default emission limits if the specific PBR does not further limit emissions or there is no lower, certified emission limit claimed by the owner/operator.

This interpretation is consistent with how TCEQ has historically determined compliance with the emission limits prior to the addition of the “as applicable” language. The “as applicable” language was added in 2014 as part of changes to the sentence structure in a rulemaking that made other changes to address greenhouse gases and was not intended as a substantive rule change. This interpretation also provides for effective and practical enforcement of 30 TAC §106.4(a), since for the TCEQ to effectively enforce the emission limits in 30 TAC §106.4(a) as emission thresholds, all emission limits must apply. As provided by 30 TAC §106.4(a)(2) and (3), an owner/operator shall not claim a PBR authorization if the facility is subject to major New Source Review. The practical and legal effect of the language in 30 TAC § 106.4 is that if a facility does not emit a pollutant, then the potential to emit for that particular pollutant is zero, and thus, the facility is not authorized to emit the pollutant pursuant to the PBR.

The permit holder is required to keep records for demonstrating compliance with PBRs in accordance with 30 TAC § 106.8 for the following categories:

- As stated in 30 TAC § 106.8(a), the permit holder is not required to keep records for de minimis sources as designated in 30 TAC § 116.119.
- As stated in 30 TAC § 106.8(b) for PBRs on the insignificant activities list, the permit holder is required to provide information that would demonstrate compliance with the general requirements of 30 TAC § 106.4.
- As stated in 30 TAC § 106.8(c) for all other PBRs, the permit holder must maintain sufficient records to demonstrate compliance with the general requirements specified in 30 TAC § 106.4 and to demonstrate compliance with the emission limits and any specific conditions of the PBR as applicable.

The application, or a previously submitted application, contains a PBR Supplemental Table. This table provides supplemental information for all PBR authorizations at the site or application area, including PBRs that are not listed on the OP-REQ1 form. PBRs that are not listed on the OP-REQ1 form authorize emission units that the TCEQ has determined are insignificant sources of emissions (IEUs). PBRs are enforceable through permit condition number 10. The EPA gives States broad discretion in prescribing monitoring, recordkeeping, and reporting for generally applicable

requirements that cover insignificant emission units. (see EPA *White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program*). Federal regulations specifically identify recordkeeping as an appropriate level of monitoring necessary to assure compliance with the requirements applicable to an emissions unit. Permitting authorities have the best sense of where it is appropriate to conclude that periodic monitoring is not necessary for IEUs, when state program rules already provide sufficient monitoring for these units.

In the case of IEUs in particular, the recordkeeping in 30 TAC §106.8 is sufficient because the units do not have the potential to violate emission limitations or other requirements under normal operating conditions. In particular, where the establishment of a regular program of monitoring would not significantly enhance the ability of the permit to assure compliance with the applicable requirement, the permitting authority can provide that the applicable requirement has monitoring sufficient to yield reliable data that is representative of the emission unit's compliance with the limitations. Therefore, for IEUs compliance with 30 TAC §106.8 is sufficient to meet federal monitoring requirements.

The PBR records may include, but are not limited to, production capacity and throughput, hours of operation, safety data sheets (SDS), chemical composition of raw materials, speciation of air contaminant data, engineering calculations, maintenance records, fugitive data, performance tests, capture/control device efficiencies, or parametric monitoring. The PBR records also satisfy the federal operating permit periodic monitoring requirements of 30 TAC § 122.142(c) as they are representative of the emission unit's compliance with 30 TAC Chapter 106.

Emission Units and Emission Points

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

Monitoring Sufficiency

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected

Periodic Monitoring:

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

Unit/Group/Process Information	
ID No.: SOL-1	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Degreasing Processes	SOP Index No.: R5412-1
Pollutant: VOC	Main Standard: § 115.412(1)
Monitoring Information	
Indicator: Visual Inspection	
Minimum Frequency: Monthly	
Averaging Period: n/a	
Deviation Limit: Any monitoring data which indicates that the cold cleaner is not in compliance with the applicable requirements of 30 TAC 115.412(1)(A)-(F) shall be considered and reported as a deviation.	
Basis of monitoring: The monitoring option to cover cold cleaner or the open-top vapor cleaner was included in the EPA "Periodic Monitoring Technical Reference Document" (April 1999) to monitor VOC sources. In addition to covering the cleaner records of monthly inspections of equipment is an effective way to ensure that the system is operating in accordance with its design.	

Obtaining Permit Documents

The New Source Review Authorization References table in the FOP specifies all NSR authorizations that apply at the permit area covered by the FOP. Individual NSR permitting files are located in the TCEQ Central File Room (TCEQ Main Campus located at 12100 Park 35 Circle, Austin, Texas, 78753, Building E, Room 103). They can also be obtained electronically from TCEQ's Central File Room Online (<https://www.tceq.texas.gov/goto/cfr-online>). Guidance documents that describe how to search electronic records, including Permits by Rule (PBRs) or NSR permits incorporated by reference into an FOP, archived in the Central File Room server are available at https://www.tceq.texas.gov/permitting/air/nav/air_status_permits.html

All current PBRs are contained in Chapter 106 and can be viewed at the following website:

https://www.tceq.texas.gov/permitting/air/permitbyrule/air_pbr_index.html

Previous versions of 30 TAC Chapter 106 PBRs may be viewed at the following website:

1.

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html

2.

Historical Standard Exemption lists may be viewed at the following website:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html

Additional information concerning PBRs is available on the TCEQ website:

https://www.tceq.texas.gov/permitting/air/nav/air_pbr.html

Compliance Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on December 7, 2020.

Site rating: 18.85 / Satisfactory Company rating: 9.87 / Satisfactory

(*High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55*)

2. Has the permit changed on the basis of the compliance history or site/company rating?..... No

Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS?..... No

2. Is a compliance plan and schedule included in the permit?..... No

Available Unit Attribute Forms

OP-UA1 - Miscellaneous and Generic Unit Attributes

OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes

OP-UA3 - Storage Tank/Vessel Attributes

OP-UA4 - Loading/Unloading Operations Attributes

OP-UA5 - Process Heater/Furnace Attributes

OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes

OP-UA7 - Flare Attributes

OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes

OP-UA11 - Stationary Turbine Attributes

OP-UA12 - Fugitive Emission Unit Attributes

OP-UA13 - Industrial Process Cooling Tower Attributes

OP-UA14 - Water Separator Attributes

OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes

OP-UA16 - Solvent Degreasing Machine Attributes

OP-UA17 - Distillation Unit Attributes

OP-UA18 - Surface Coating Operations Attributes

OP-UA19 - Wastewater Unit Attributes

OP-UA20 - Asphalt Operations Attributes

OP-UA21 - Grain Elevator Attributes

OP-UA22 - Printing Attributes

OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes
OP-UA25 - Synthetic Fiber Production Attributes
OP-UA26 - Electroplating and Anodizing Unit Attributes
OP-UA27 - Nitric Acid Manufacturing Attributes
OP-UA28 - Polymer Manufacturing Attributes
OP-UA29 - Glass Manufacturing Unit Attributes
OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes
OP-UA31 - Lead Smelting Attributes
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes
OP-UA33 - Mineral Processing Plant Attributes
OP-UA34 - Pharmaceutical Manufacturing
OP-UA35 - Incinerator Attributes
OP-UA36 - Steel Plant Unit Attributes
OP-UA37 - Basic Oxygen Process Furnace Unit Attributes
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes
OP-UA39 - Sterilization Source Attributes
OP-UA40 - Ferroalloy Production Facility Attributes
OP-UA41 - Dry Cleaning Facility Attributes
OP-UA42 - Phosphate Fertilizer Manufacturing Attributes
OP-UA43 - Sulfuric Acid Production Attributes
OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes
OP-UA45 - Surface Impoundment Attributes
OP-UA46 - Epoxy Resins and Non-Nylon Polyamides Production Attributes
OP-UA47 - Ship Building and Ship Repair Unit Attributes
OP-UA48 - Air Oxidation Unit Process Attributes
OP-UA49 - Vacuum-Producing System Attributes
OP-UA50 - Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes
OP-UA51 - Dryer/Kiln/Oven Attributes
OP-UA52 - Closed Vent Systems and Control Devices
OP-UA53 - Beryllium Processing Attributes
OP-UA54 - Mercury Chlor-Alkali Cell Attributes
OP-UA55 - Transfer System Attributes
OP-UA56 - Vinyl Chloride Process Attributes
OP-UA57 - Cleaning/Depainting Operation Attributes
OP-UA58 - Treatment Process Attributes
OP-UA59 - Coke By-Product Recovery Plant Attributes
OP-UA60 - Chemical Manufacturing Process Unit Attributes
OP-UA61 - Pulp, Paper, or Paperboard Producing Process Attributes
OP-UA62 - Glycol Dehydration Unit Attributes
OP-UA63 - Vegetable Oil Production Attributes
OP-UA64 - Coal Preparation Plant Attributes