

Permit by Rule (PBR) Registration Technical Review

Company:	Gulf Coast Growth Ventures LLC	Registration No.:	178095
Nearest City:	Gregory	Project No.:	382685
County:	San Patricio	Project Type:	Initial
Project Reviewer:	Chelsea Davis	Regulated Entity No.:	RN109753731
Unit Name:	Gulf Coast Growth Ventures Project	Customer Reference No.:	CN605632439
PBR No(s).:	106.433	Project Received Date:	October 31, 2024
Physical Location:	4589 Fm 2986		

Project Overview / Process Description

Gulf Coast Growth Ventures LLC (GCGV) owns and operates the chemical manufacturing facility near Gregory, Texas under various permits including NSR 146425 and Title V O4169.

With this project GCGV proposes to authorize an outdoor surface coating operation at the facility under PBR 106.433.

Surface coating at Emission Point Number (EPN) COATING will use mechanical means utilizing propellants are used to apply coatings to items such as valves, vessels, and piping. If needed, GCGV will utilize a separate authorization (30 TAC 106.263) for surface coating on immovable fixed structures within the rest of the facility's boundary.

This project will be incorporated into NSR 146425 at next amendment or renewal.

Permit by Rule Requirements - 30 TAC Chapter 106

General Requirements

Registration Fee Reference No.:	Application fee: 728727 / 582EA000632230
Is this registration certified?	Yes
Is planned MSS included in the registration?	No
Are there affected NSR or Title V authorizations for the project?	Yes
<i>NSR and/or Title V authorizations:</i>	NSR 146125 and Title O-4169
Are there any upstream or downstream affects associated with this registration?	No
Are associated upstream/downstream emissions either included in the registration OR within current permitted limits with no changes to underlying air authorizations for the applicable units regarding BACT, health and environmental impacts, or other representations.	NA
Are emissions for each PBR authorized facility less than the § 106.4(a)(1) limits?	Yes
Are total emissions from all sitewide PBR authorized facilities less than the § 106.4(a)(4) limits, OR has the site been subject to public notice requirements? Site subject to public notice under NSR 146125	Yes
Are there permit limits on using PBRs at the site?	No
Is the facility in compliance with all other applicable rules and regulations?	Yes
Notes:	

Federal Applicability

Does this project trigger a PSD or Nonattainment review?	No
Does the Major NSR applicability analysis include all associated upstream and/or downstream emissions?	NA
Are there any applicable standards under NSPS, NESHAP, or NESHAP for source categories (MACT)?	Yes
If Yes, list applicable subparts:	NSPS A, Db, VVa, DDD, NNN, RRR, IIII; MACT A, F, G, H, SS, XX, YY, EEEE, ZZZZ, DDDDD; NESHAP A, J, FF

Permit by Rule (PBR) Registration

Registration No. 178095
Page 2

Project No. 382685

Permit by Rule Requirements - Compliance Demonstrations

PBR 106.433 Surface Coat Facility

Surface coating or stripping facilities, excluding vehicle repair and refinishing shops, shall meet the following conditions of this section to be permitted by rule.

- (1) No metalizing, spraying molten metal onto a surface to form a coating, occurring on site. However, this section does cover the use of coatings which contain metallic pigments.
- (2) GCGV will follow good housekeeping procedures as required in subparagraphs (A-C) of this paragraph.
- (3) N/A, no drying or curing ovens used on site.
- (4) No add-on control equipment shall be used to meet the emissions limits of this section. The total uncontrolled emissions from the coating materials (as applied) and cleanup solvents shall not exceed the following for all operations:
 - (4)(A) Annual emissions: 25 tpy of VOC (**Actual: 1.74 tpy**) and 10 tpy of exempt solvents (**Actual: 0.00 tpy**).
 - (4)(B) Hourly emissions: 30 lb/hr of VOC (**Actual: 14.00 lb/hr**) and 5.0 lb/hr of exempt solvents (**Actual 0.00 lb/hr**).
 - (4)(C) Emissions > 0.25 lb/hr of VOC and/or exempt solvents, the facility will meet paragraphs (5)-(9) of this section.
- (5) Opacity of visible emissions will not exceed 5.0% as determined by US EPA Method 9 averaged over a six-minute period.
- (6) N/A, surface coating operations are performed in indoor operations meeting 106.433(7)
- (7) For surface coating operations that are performed outdoors or in a non-enclosed work area, or for indoor operations that do not meet the conditions of paragraph (6) of this section, the following conditions apply.
 - (7)(A) No more than 6 lb/hr of VOC emissions (**Actual: <6.00 lb/hr VOC**), averaged over any five-hour period, 500 pounds per week (**Actual: 400.0 lb/week VOC**) shall be emitted at any time for all operations authorized by this paragraph.
 - (7)(B) N/A no coatings applied contain more than 0.1% by weight of chromates, lead, cadmium, selenium, strontium, or cobalt.
 - (7)(C) Coating operations conducted \geq 50 feet from the property line (**Actual: 2340 ft**) and \geq 250 feet (**Actual: 2578 ft**) from any receptor.
 - (7)(D) Before construction of the facility begins, written site approval shall be received from the appropriate regional office of the commission or any local program having jurisdiction.
- (8) GCGV will maintain records indicated in subparagraphs (A-D) will be maintained at the plant site for the most recent 24 months and be made immediately available to the commission or any pollution control agency with jurisdiction.
- (9) Before construction begins, the facility shall be registered with the commission using Form **PI-7-CERT**.

Notes:

Compliance History and Site Review

In accordance with 30 TAC Chapter 60, a compliance history report was reviewed on: **November 4, 2024**

Site rating / classification: **0.25 / Satisfactory** Company rating / classification: **0.25 / Satisfactory**

Has any action occurred on the basis of the compliance history or rating? **No**

Did the Regional Office provide site approval and confirm distances? **Yes**

Reviewed by: **John Pearce – Region 14** Date: **November 8, 2024**

Emission Summary

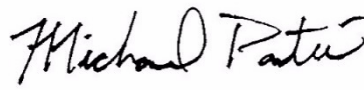
EPN / Emission Source	VOC		NOx		PM		PM ₁₀		PM _{2.5}		SO ₂		Other	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
COATING/ Surface Coating Operations	14.00	1.74			1.75	0.22	1.75	0.22	1.75	0.22				
TOTAL EMISSIONS (TPY):	--	1.74			--	0.22	--	0.22	--	0.22				
MAXIMUM OPERATING SCHEDULE:			Hours/Day			Days/Week			Weeks/Year			Hours/Year		8,760



Chelsea Davis
Reviewer- Rule Registration Section

December 3, 2024

Date



Michael Partee
Manager - Rule Registrations Section

December 3, 2024

Date