

Gulf Coast Growth Ventures LLC  
P.O. Box 367  
Gregory, TX 78359-0367



**ELECTRONIC SUBMISSION  
TCEQ STEERS DATABASE**

March 21, 2025

MC 161, Permits Administrative Review Section  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, TX 78711-3087

**Re: PBRs §106.262  
MEG Unit Fugitive Increases MOCs 2286749 and 2291316  
Gulf Coast Growth Ventures LLC  
Customer Reference Number – CN605632439  
Regulated Entity Number – RN109753731  
Permit Numbers – NSR 146425, PSDTX1518, GHGPSDTX170, Title V O4169**

On behalf of Gulf Coast Growth Ventures LLC, enclosed is the submission to authorize the increase in fugitive emissions by adding new equipment pursuant to Permits by Rule 30 TAC §106.262.

This PBR submittal satisfies the notification requirements as set forth in 30 TAC §106.262(a)(3), as follows:

- Attachment 1 – Overall Facility Information - Project Information
- Attachment 2 – Process Description
- Attachment 3 – Summary of Emissions
- Attachment 4 – Emission Calculations – CONFIDENTIAL BUSINESS INFORMATION
- Attachment 5 – Facility Maps / Process Flow Diagram
- Attachment 6 – Application Forms
- Attachment 7 – Miscellaneous Discussions

If you have any questions about this notification, please contact Jim Stoos at (409) 658-2134 or via email at [jim.a.stoos1@exxonmobil.com](mailto:jim.a.stoos1@exxonmobil.com).

Sincerely,

[Signed electronically via STEERS]

Brady Fontenot  
Environmental Section Supervisor  
Gulf Coast Growth Ventures LLC  
Attachments

## Attachment 1 – Overall Facility Information - Project Information

Table 1 provides overall facility information. Attachment 5 shows the general site location, area map, facility plot plan and a process flow diagram.

Table 1 Overall Facility Information

Criteria	General Information
Applicant:	Gulf Coast Growth Ventures LLC (GCGV)
RN Number:	RN109753731
CN Number:	CN605632439
Facility Name:	Gulf Coast Growth Ventures LLC (GCGV)
Facility Location:	Gregory, Texas
County:	San Patricio County
Street Address:	4589 FM 2986, Gregory, Texas 78359
Mailing Address:	Post Office Box 367, Gregory, Texas 78359-0367
NSR Permit Number:	146425
PSD Permit Number:	PSDTX1518
GHG Permit Number:	GHGPSDTX170
Title V Permit Number:	O4169

Gulf Coast Growth Ventures LLC (GCGV) implemented and/or will implement projects that will increase fugitive emissions. The project scopes are listed below as well as in the “Project List” tab of the TCEQ 261 / 262 Project Workbook.

The purpose of this document is to demonstrate the changes meet the requirements of 30 TAC §106.262. Additionally, this document demonstrates the changes comply with all applicable rules and regulations of the Texas Clean Air Act (TCAA).

GCGV is installing the following MOCs.

MOC# 2286749 adds fugitive components (EPN SITE\_FUG formerly G\_FUG) to the MEG Unit to allow for easier removal and maintenance of control valves. There will be no impact on production rate or upstream / downstream impacts. These components will be installed during a planned outage and the changes can be made with no other emission increases including MSS emissions.

MOC# 2291316 adds fugitive components (EPN SITE\_FUG formerly G\_FUG) to the MEG Unit to improve analyzer performance by adding a pump to assist the routing of a sample stream back to process. There will be no impact on production rate or upstream / downstream impacts. These components will be installed during a planned outage and the changes can be made with no other emission increases including MSS emissions.

These MOCs will also meet the following requirements:

- Emissions stay at or below current permit limits. No increases in actual maximum hourly emissions. No increases in 2-year baseline actual emissions (BAE).
- No Changes to Best Available Control Technology (BACT), Impacts, or other representations.
- This project does not trigger major New Source Review (NSR) permitting.
- Certified registration is included with this application.

The changes in these projects will have no impacts on process operations, including upstream and downstream operations. The changes in these projects will be installed (or have been installed) using hot tapping or during already planned equipment outages; therefore, no increase in planned maintenance, startup, and shutdown (MSS) activities are expected from these Projects. Based upon the information provided above, Table 2 summarizes emission sources affected by this PBR registration.

Table 2 Affected Sources from Projects

Emission Point Number	Permit Number	Emission Source Description
SITE_FUG	New Source Review (NSR) Permit 146425	Sitewide Fugitives (including Olefins Unit, Glycol Unit, Utilities, EPE and CPE)

Attachment 5 Facility Plot Plan shows the location of the fugitive components [the MEG Unit areas]. Attachment 5 also includes a simplified process flow diagram.

## **Attachment 2 – Process Description**

GCGV located at 4589 FM 2986, Gregory, TX, manufacturing complex includes the following production units and/or support facilities:

### **Olefins Production Unit,**

The olefins production unit produces ethylene and other products from ethane, which is supplied by pipeline.

### **Polyethylene Production Unit(s),**

Two polyethylene production units produce polyethylene from ethylene, which is either manufactured on site and/or supplied by pipeline.

### **Glycol Production Unit,**

The glycol production unit produces mono ethylene glycol from ethylene, which is either manufactured on site and/or supplied by pipeline.

### **Associated Utilities and Infrastructure Facilities, and,**

The various production units use common utilities and infrastructure facilities to support operations, such as steam, tankage, cooling water, wastewater treatment, backup power generation, etc.

A process flow diagram of the overall site is included as part of Attachment 5.

**Customer Reference Number: CN605632439**  
**Regulated Entity Number: RN109753731**

[illegible]

**Attachment 4 – Emission Calculations**  
**CONFIDENTIAL BUSINESS INFORMATION**

The emission calculations are considered “CONFIDENTIAL BUSINESS INFORMATION”, and GCGV is submitting this portion of the authorization under a separate cover. The information indicated as “CONFIDENTIAL BUSINESS INFORMATION” should be treated as such pursuant to Texas Clean Air Act §382.041(a) and the Texas Public Information Act Chapter 552. Any request for portions of this authorization that are marked as “CONFIDENTIAL BUSINESS INFORMATION” must be submitted in writing, pursuant to the Public Information Act, to the TCEQ Public Information Coordinator, MC-197, P. O. Box 13087, Austin, Texas 78711-3087.

PBRs §106.262  
MEG Unit Fugitive Increases MOCs 2286749 and 2291316  
Gulf Coast Growth Ventures LLC

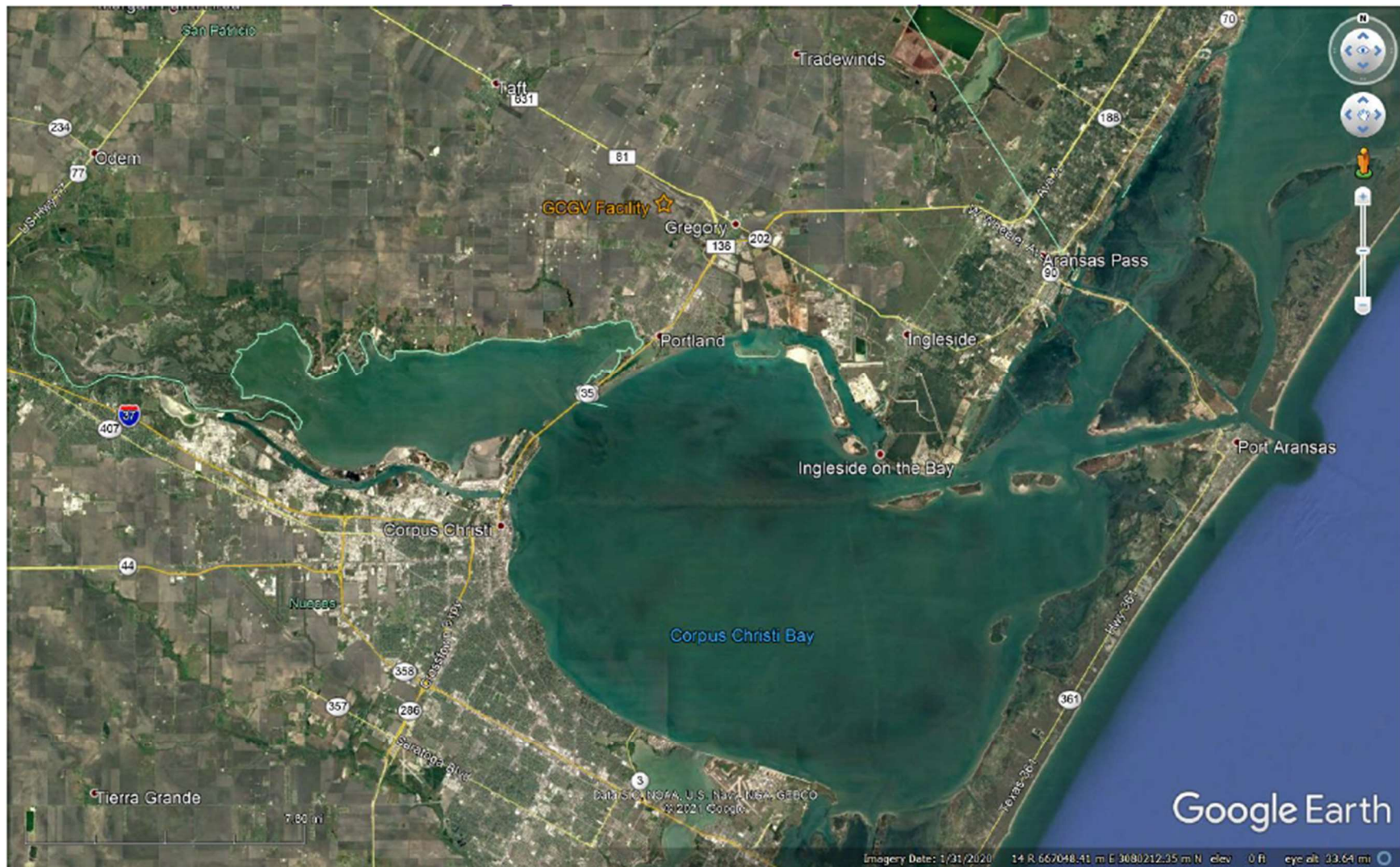
Customer Reference Number: CN605632439  
Regulated Entity Number: RN109753731

## **Attachment 5 – Facility Maps / Process Flow Diagram**

- General Site Location Map
- Area Map
- Facility Plot Plan
- Process Flow Diagram for Overall Facility



## General Site Location Map



### Note(s):

- The location of Gulf Coast Growth Ventures LLC (GCGV) [RN109753731] is depicted by an [orange star](#) in this figure.



## Area Map

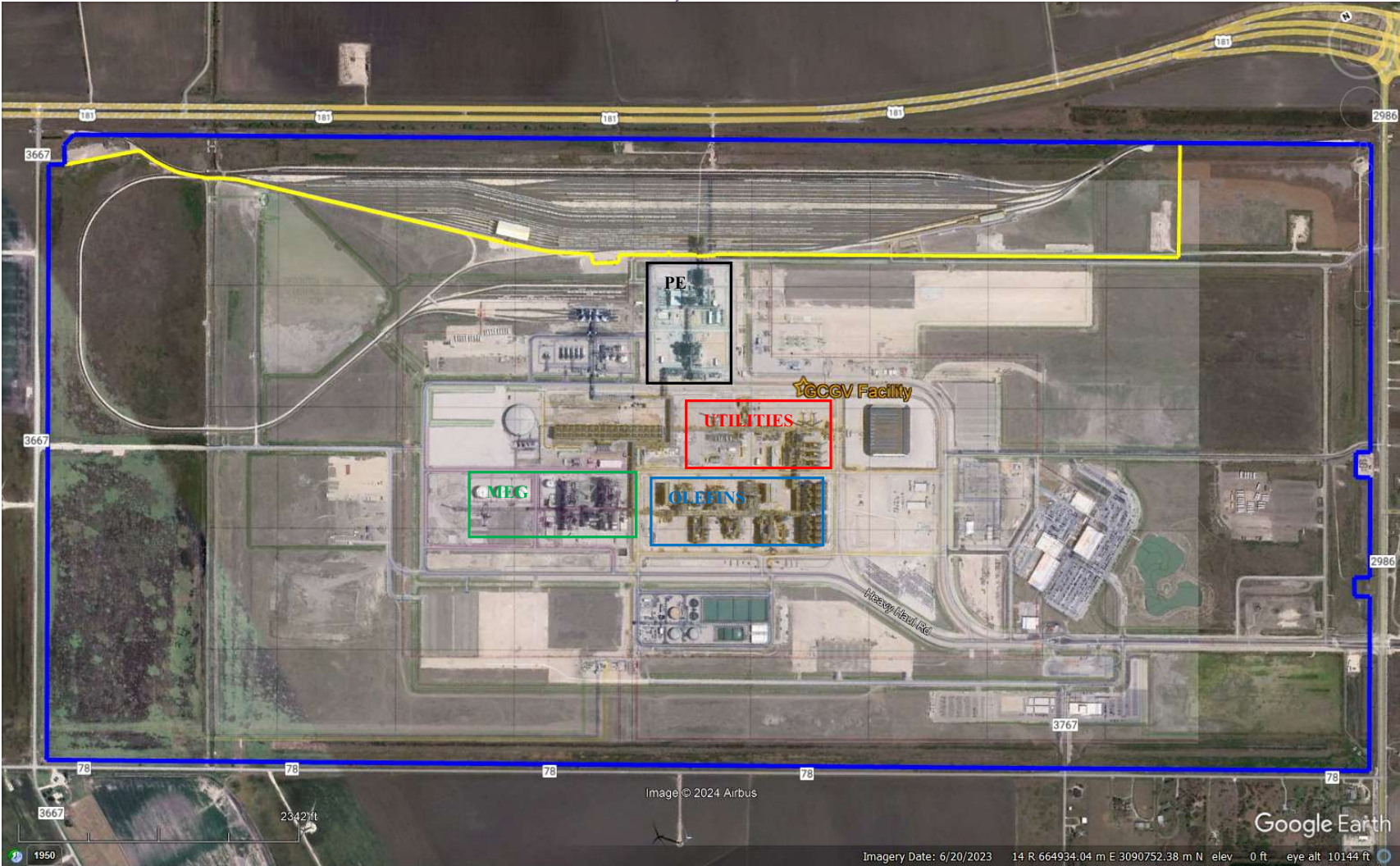


Note(s):

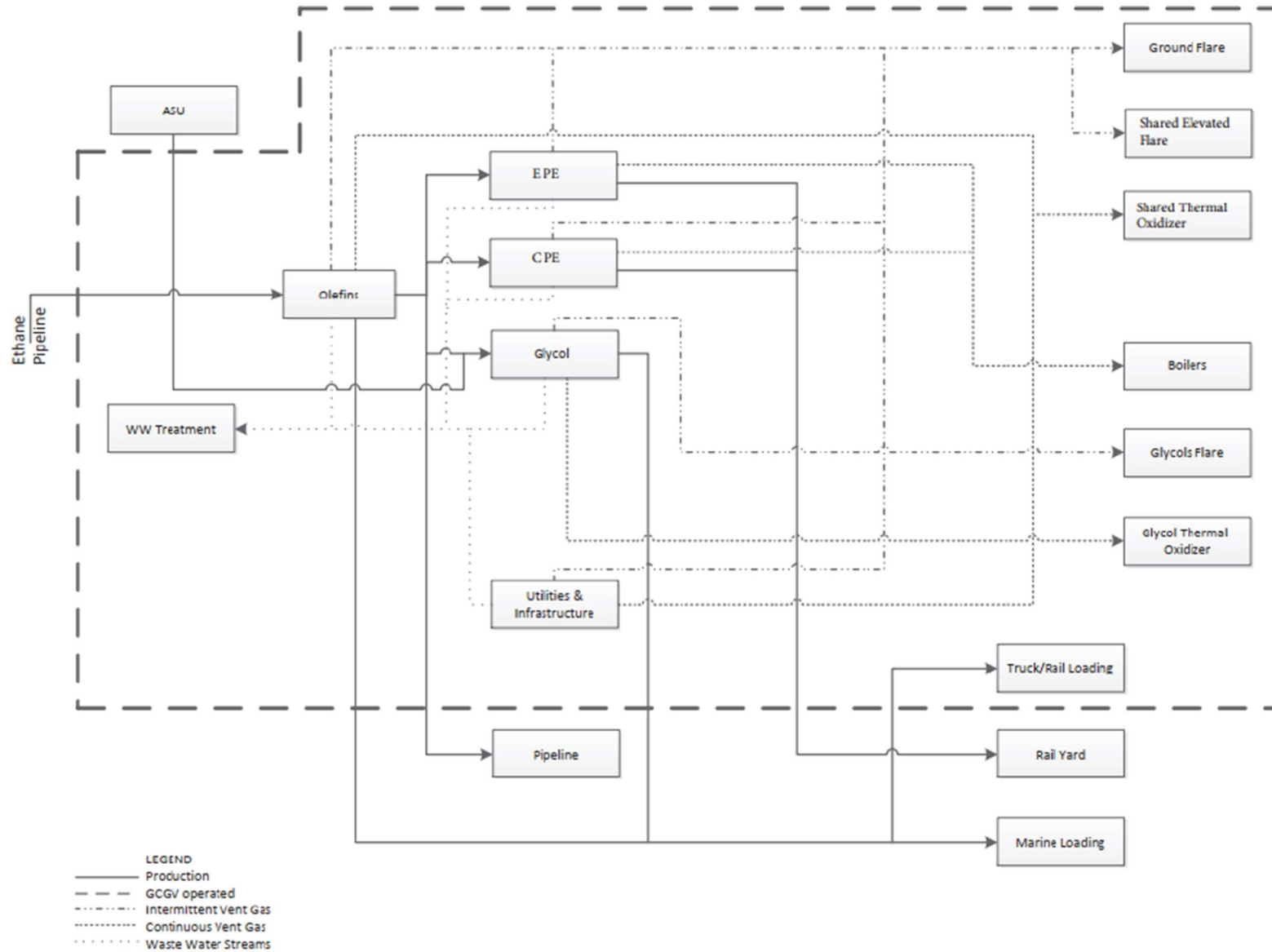
- The location of Gulf Coast Growth Ventures LLC (GCGV) [RNI09753731] is depicted by an orange star in this figure.
- The property line for the GCGV facility is depicted by a blue line in this figure.
  - On November 15, 2019, GCGV transferred operations of the railyard transfer facility to Savage Gulf Rail, LLC [CN605722222], which is depicted by a yellow line in this figure. Both GCGV [RNI09753731] and Savage Gulf Rail, LLC [CN605722222] share an external fenceline and security procedures.
- 3,000 feet from the property line for the GCGV facility is depicted by a white line in this figure.



Facility Plot Plan



# Process Flow Diagram



**PBRs §106.262**  
**MEG Unit Fugitive Increases MOCs 2286749 and 2291316**  
**Gulf Coast Growth Ventures LLC**

**Customer Reference Number: CN605632439**  
**Regulated Entity Number: RN109753731**

## **Attachment 6 – Application Forms**

- **PI-7-CERT**
- **Permit by Rule §106.4 Checklist**
- **Permit by Rule §106.262 Checklist**

**Certification and Registration for Permits by Rule**  
**Form PI-7-CERT**  
**Page 1**  
**Texas Commission on Environmental Quality**

<b>I. Registrant Information</b>
A. Company or Other Legal Customer Name: Gulf Coast Growth Ventures LLC (GCGV)
Company Official Contact Information ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Other _____)
Name: Brady Fontenot
Title: GCGV Environmental Section Supervisor
Mailing Address: P. O. Box 367
City: Gregory
State: Texas
ZIP Code: 78359
Phone: 225-200-3091
Fax:
Email Address: Brady.J.Fontenot@ExxonMobil.com
<i>All PBR registration responses will be sent via email.</i>
A. Technical Contact Information ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Other _____)
Name: Robert H. St John
Title: Senior Environmental Advisor
Company Name: Gulf Coast Growth Ventures LLC
Mailing Address: P. O. Box 367
City: Gregory
State: Texas
ZIP Code: 78359
Phone Number: 361-413-9405
Fax Number:
Email Address: robert.h.stjohn@exxonmobil.com

**Certification and Registration for Permits by Rule**  
**Form PI-7-CERT**  
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<b>II. Facility and Site Information</b>
A. Name and Type of Facility
Facility Name: Gulf Coast Growth Ventures LLC (GCGV)
Facility Type: <input checked="" type="checkbox"/> Permanent <input type="checkbox"/> Temporary
For portable units, please provide the serial number of the equipment being authorized below.
Serial No(s):
B. Facility Location Information
Street Address: 4589 FM 2986
If there is no street address, provide written driving directions to the site and provide the closest city or town, county, and ZIP code for the site (attach description if additional space is needed).
City: Gregory
County: San Patricio
ZIP Code: 78359-0367
C. TCEQ Core Data Form
Is the Core Data Form (TCEQ Form Number 10400) attached? <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
If "NO," provide customer reference number (CN) and regulated entity number (RN) below.
Customer Reference Number (CN): CN605632439
Regulated Entity Number (RN): RN109753731
D. TCEQ Account Identification Number (if known):
E. Type of Action
<input checked="" type="checkbox"/> Initial Application <input type="checkbox"/> Change to Registration
For Change to Registration provide the Registration Number:
F. PBR number(s) claimed under 30 TAC Chapter 106
(List all the individual rule number(s) that are being claimed.)
106.262
106.
106.
106.

**Certification and Registration for Permits by Rule  
Form PI-7-CERT  
Page 3  
Texas Commission on Environmental Quality**

<b>II. Facility and Site Information</b> <i>(continued)</i>
<b>G. Historical Standard Exemption or PBR</b>
Are you claiming a historical standard exemption or PBR? <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
If "YES," enter rule number(s) and associated effective date in the spaces provided below.
Rule Number: <span style="float: right;">Effective Date:</span>
Rule Number: <span style="float: right;">Effective Date:</span>
<b>H. Previous Standard Exemption or PBR Registration Number</b>
Is this authorization for a change to an existing facility previously authorized under a standard exemption or PBR? <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
If "YES," enter previous standard exemption number(s) and PBR registration number(s) and associated effective dates in the spaces provided below.
Standard Exemption and PBR Registration Number:
Effective Date:
<b>I. Other Facilities at this Site Authorized by Standard Exemption, PBR, or Standard Permit</b>
Are there any other facilities at this site that are authorized by an Air Standard Exemption, PBR, or Standard Permit? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>
If "YES," enter standard exemption number(s), PBR registration number(s), and Standard Permit registration number(s), and associated effective date in the spaces provided below.
167159 [12/13/2021]; 172265 [05/12/2023], 175529 [03/05/2024], 175871 [04/12/2024],
176781 [07/03/2024], 176812 [07/08/2024], 177270 [8/23/2024], 177545 [10/15/2024], 178095 [12/3/2024]
178433 [11/27/24], 178646 [12/19/2024], 178822 [1/15/2025]
<b>J. Other Air Preconstruction Permits</b>
Are there any other air preconstruction permits at this site? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>
If "YES," enter permit number(s) in the spaces provided below.
146425, PSDTX1518, GHGPSDTX170
<b>K. Affected Air Preconstruction Permits</b>
Does the PBR being claimed directly affect any permitted facility? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>



**Certification and Registration for Permits by Rule**  
**Form PI-7-CERT**  
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<b>II. Facility and Site Information</b> <i>(continued)</i>
If "YES," enter the permit number(s) in the spaces provided below.
146425, PSDTX1518, GHGPSDTX170
<b>L. Federal Operating Permit (FOP) Requirements</b> (30 TAC Chapter 122 Applicability)
1. Is this facility located at a site that is required to obtain an FOP pursuant to 30 TAC Chapter 122? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> To Be Determined</span>
If the site currently has an existing FOP, enter the permit number: O4169
Check the requirements of 30 TAC Chapter 122 that will be triggered if this certification is accepted. <i>(check all that apply)</i>
<input type="checkbox"/> Initial Application for a FOP <input type="checkbox"/> Significant Revision for an SOP <input type="checkbox"/> Minor Revision for an SOP
<input type="checkbox"/> Operational Flexibility/Off Permit Notification for an SOP <input type="checkbox"/> Revision for a GOP
<input type="checkbox"/> To be Determined <input checked="" type="checkbox"/> None
2. Identify the type(s) of FOP issued and/or FOP application(s) submitted/pending for the site. <i>(check all that apply)</i>
<input checked="" type="checkbox"/> SOP <input type="checkbox"/> GOP <input type="checkbox"/> GOP application/revision (submitted or under APD review)
<input type="checkbox"/> N/A <input checked="" type="checkbox"/> SOP application/revision (submitted or under APD review)
<b>III. Fee Information</b> <i>(See Section VII. for address to send fee or go to <a href="http://www.tceq.texas.gov/epay">www.tceq.texas.gov/epay</a> to pay online.)</i>
<b>A. Fee Requirements</b>
Is a fee required per Title 30 TAC § 106.50? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>
If "NO," specify the exception. There are three exceptions to paying a PBR fee. <i>(check all that apply)</i>
1. Registration is solely to establish a federally enforceable emission limit. <span style="float: right;"><input type="checkbox"/></span>
2. Registration is within six months of an initial PBR review, and it is addressing deficiencies, administrative changes, or other allowed changes. <span style="float: right;"><input type="checkbox"/></span>
3. Registration is for a remediation project (30 TAC § 106.533). <span style="float: right;"><input type="checkbox"/></span>
<b>B. Fee Amount</b>
1. A \$100 fee is required if <i>any</i> of the answers in III.B.1 are "YES."
This business has less than 100 employees. <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
This business has less than \$6 million dollars in annual gross receipts. <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
This registration is submitted by a governmental entity with a population of less than 10,000. <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
This registration is submitted by a non-profit organization. <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>

**Certification and Registration for Permits by Rule**  
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<b>III. Fee Information</b> (See Section VII. for address to send fee or go to <a href="http://www.tceq.texas.gov/epay">www.tceq.texas.gov/epay</a> to pay online.) (continued)	
2. A \$450 fee is required for all other registrations	
A. Payment Information	
Check/money order/transaction or voucher number:	
Individual or company name on check:	
Fee Amount: \$450	
Was the fee paid online? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>	
<b>IV. Technical Information Including State and Federal Regulatory Requirements</b> <b>Check the appropriate box to indicate what is included in your submittal.</b> <b>NOTE:</b> Any technical or essential information needed to confirm that facilities are meeting the requirements of the PBR must be provided. Not providing key information could result in a deficiency of the project.	
A. PBR requirements (Checklists are optional; however, your review will go faster if you provide applicable checklists.)	
Did you demonstrate that the general requirements in 30 TAC § 106.4 are met? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>	
Did you demonstrate that the individual requirements of the specific PBR are met? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>	
B. Confidential Information Included (If confidential information is submitted with this registration, all confidential pages must be properly marked "CONFIDENTIAL.") <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>	
C. Process Flow Diagram: <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>	
D. Process Description: <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>	
E. Maximum Emissions Data and Calculations: <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>	
<b>Note:</b> If the facilities listed in this registration are subject to the Mass Emissions Cap & Trade program under <b>30 TAC Chapter 101, Subchapter H, Division 3</b> , the owner/operator of these facilities must possess NO <sub>x</sub> allowances equivalent to the actual NO <sub>x</sub> emissions from these facilities.	
F. Is this certification being submitted to certify the emissions for the entire site? <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>	
If "NO," include a summary of the specific facilities and emissions being certified.	
G. Table 1(a) (Form 10153) Emission Point Summary: <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>	
H. Distances from Property Line and Nearest Off-Property Structure	
Distance from this facility's emission release point to the nearest property line: 1948	feet
Distance from this facility's emission release point to the nearest off-property structure: 1948	feet

**Certification and Registration for Permits by Rule**  
**Form PI-7-CERT**  
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**IV. Technical Information Including State and Federal Regulatory Requirements**

**Check the appropriate box to indicate what is included in your submittal.**

**NOTE:** Any technical or essential information needed to confirm that facilities are meeting the requirements of the PBR must be provided. Not providing key information could result in a deficiency of the project.

**I. Project Status**

Has the company implemented the project or waiting on a response from TCEQ?

☒ Implemented ☐ Waiting

**J. Projected Start of Construction and Projected Start of Operation Dates:**

Projected Start of Construction (provide date): TBD

Projected Start of Operation (provide date): TBD

**V. Delinquent Fees**

This form **will not be processed** until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ is paid in accordance with the Delinquent Fee and Penalty Protocol. For more information regarding Delinquent Fees and Penalties, go to the TCEQ website at: [www.tceq.texas.gov/agency/financial/fees/delin/index.html](http://www.tceq.texas.gov/agency/financial/fees/delin/index.html).

**VI. Signature For Registration and Certification**

The signature below confirms that I have knowledge of the facts included in this application and that these facts are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which this application is made will not in any way violate any provision of the Texas Water Code (TWC), Chapter 7; the Texas Health and Safety Code, Chapter 382, the Texas Clean Air Act (TCAA); the air quality rules of the Texas Commission on Environmental Quality; or any local governmental ordinance or resolution enacted pursuant to the TCAA. I further state that I understand my signature indicates that this application meets all applicable nonattainment, prevention of significant deterioration, or major source of hazardous air pollutant permitting requirements. The signature further signifies awareness that intentionally or knowingly making or causing to be made false material statements or representations in the application is a criminal offense subject to criminal penalties.

Name (printed):

*Brady Fenterot*

Signature (original signature required)

*Brady Fenterot*

Date:

*March 18, 2025*

**Certification and Registration for Permits by Rule  
Form PI-7-CERT  
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**VII. Submitting Copies of the Certification and Registration**

**Copies must be sent as listed below.**

**Processing delays may occur if copies are not sent as noted.**

Who	Where	What
Air Permits Initial Review Team (APIRT)	Regular, Certified, Priority Mail MC 161, P.O. Box 13087 Austin, Texas 78711-3087 Hand Delivery, Overnight Mail MC 161, 12100 Park 35 Circle, Building C, Third Floor Austin, Texas 78753	Originals Form PI-7-CERT, Core Data Form, and all attachments. Not required if using ePermits <sup>1</sup> .
Revenue Section, TCEQ	Regular, Certified, Priority Mail MC 214, P.O. Box 13088 Austin, Texas 78711-3088 Hand Delivery, Overnight Mail MC 214, 12100 Park 35 Circle, Building A, Third Floor Austin, Texas 78753	Original Money Order or Check, Copy of Form PI-7-CERT, and Core Data Form. Not required if fee was paid using ePay <sup>2</sup> .
Appropriate TCEQ Regional Office	To find your Regional Office address, go to the TCEQ website at <a href="http://www.tceq.texas.gov/agency/directory/region">www.tceq.texas.gov/agency/directory/region</a> , or call (512) 239-1250.	Copy of Form PI-7-CERT, Core Data Form, and all attachments. Not required if using ePermits <sup>1</sup>
Appropriate Local Air Pollution Control Program(s)	To Find your local or Regional Air Pollution Control Programs go to the TCEQ, APD website at <a href="http://www.tceq.texas.gov/permitting/air/local_programs.html">www.tceq.texas.gov/permitting/air/local_programs.html</a> , or call (512)-239-1250	Copy of Form PI-7-CERT, Core Data Form, and all attachments.

<sup>1</sup> ePermits located at [www3.tceq.texas.gov/steers/](http://www3.tceq.texas.gov/steers/)

<sup>2</sup> ePay located at [www.tceq.texas.gov/epay](http://www.tceq.texas.gov/epay)

**Texas Commission on Environmental Quality**  
**Permit by Rule Applicability Checklist**  
**Title 30 Texas Administrative Code § 106.4**

The following checklist was developed by the Texas Commission on Environmental Quality (TCEQ), **Air Permits Division**, to assist applicants in determining whether or not a facility meets all of the applicable requirements. Before claiming a specific Permit by Rule (PBR), a facility must first meet all of the requirements of **Title 30 Texas Administrative Code § 106.4** (30 TAC § 106.4), "Requirements for Permitting by Rule." Only then can the applicant proceed with addressing requirements of the specific Permit by Rule being claimed.

The use of this checklist is not mandatory; however, it is the responsibility of each applicant to show how a facility being claimed under a PBR meets the general requirements of 30 TAC § 106.4 and also the specific requirements of the PBR being claimed. If all PBR requirements cannot be met, a facility will not be allowed to operate under the PBR and an application for a construction permit may be required under 30 TAC § 116.110(a).

Registration of a facility under a PBR can be performed by completing **Form PI-7** (Registration for Permits by Rule) or **Form PI-7-CERT** (Certification and Registration for Permits by Rule). The appropriate checklist should accompany the registration form. Check the most appropriate answer and include any additional information in the spaces provided. If additional space is needed, please include an extra page and reference the question number. The PBR forms, tables, checklists, and guidance documents are available from the TCEQ, Air Permits Division website at: [www.tceq.texas.gov/permitting/air/nav/air\\_pbr.html](http://www.tceq.texas.gov/permitting/air/nav/air_pbr.html).

1. 30 TAC § 106.4(a)(1) and (4): Emission Limits	Answer
List emissions in tpy for <b>each</b> facility (add additional pages or table if needed):	
Are the SO <sub>2</sub> , PM <sub>10</sub> , VOC, or other air contaminant emissions claimed for <b>each</b> facility in this PBR submittal less than 25 tpy?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Are the NO <sub>x</sub> and CO emissions claimed for each facility in this PBR submittal less than 250 tpy?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
<i>If the answer to both is "Yes," continue to the question below. If the answer to either question is "No," a <b>PBR cannot be claimed</b>.</i>	
Has any facility at the property had public notice and opportunity for comment under 30 TAC Section 116 for a regular permit or permit renewal? (This does not include public notice for voluntary emission reduction permits, grandfathered existing facility permits, or federal operating permits.)	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
<i>If "Yes," skip to Section 2. If "No," continue to the questions below.</i>	
If the site has had no public notice, please answer the following:	
Are the SO <sub>2</sub> , PM <sub>10</sub> , VOC, or other emissions claimed for <b>all</b> facilities in this PBR submittal less than 25 tpy?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are the NO <sub>x</sub> and CO emissions claimed for all facilities in this PBR submittal less than 250 tpy?	<input type="checkbox"/> YES <input type="checkbox"/> NO
<i>If the answer to both questions is "Yes," continue to Section 2.</i>	
<i>If the answer to either question is "No," a <b>PBR cannot be claimed</b>. A permit will be required under Chapter 116.</i>	

**Texas Commission on Environmental Quality**  
**Permit by Rule Applicability Checklist**  
**Title 30 Texas Administrative Code § 106.4**

2. <b>30 TAC § 106.4(a)(2): Nonattainment Check</b>	Answer
Are the facilities to be claimed under this PBR located in a designated ozone nonattainment county?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<i>If "Yes," please indicate which county by checking the appropriate box to the right.</i>	
(Moderate) - Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, and Waller counties:	<input type="checkbox"/> HGB
(Moderate) - Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, Tarrant, and Wise counties:	<input type="checkbox"/> DFW
<i>If "Yes," to any of the above, continue to the next question. If "No," continue to Section 3.</i>	
Does this project trigger a nonattainment review?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Is the project's potential to emit (PTE) for emissions of VOC or NO <sub>x</sub> increasing by 100 tpy or more?	<input type="checkbox"/> YES <input type="checkbox"/> NO
<i>PTE is the maximum capacity of a stationary source to emit any air pollutant under its worst-case physical and operational design unless limited by a permit, rules, or made federally enforceable by a certification.</i>	
Is the site an existing major nonattainment site and are the emissions of VOC or NO <sub>x</sub> increasing by 40 tpy or more?	<input type="checkbox"/> YES <input type="checkbox"/> NO
<i>If needed, attach contemporaneous netting calculations per nonattainment guidance.</i>	
Additional information can be found at: <a href="http://www.tceq.texas.gov/permitting/air/forms/newsource/tables/nsr_table8.html">www.tceq.texas.gov/permitting/air/forms/newsource/tables/nsr_table8.html</a> and <a href="http://www.tceq.texas.gov/permitting/air/nav/air_docs_newsource.html">www.tceq.texas.gov/permitting/air/nav/air_docs_newsource.html</a>	
<i>If "Yes," to any of the above, the project is a major source or a major modification and a <b>PBR may not be used</b>. A Nonattainment Permit review must be completed to authorize this project. If "No," continue to Section 3.</i>	
3. <b>30 TAC § 106.4(a)(3): Prevention of Significant Deterioration (PSD) check</b>	
Does this project trigger a review under PSD rules?	
To determine the answer, review the information below:	
Are emissions of any regulated criteria pollutant increasing by 100 tpy of any criteria pollutant at a named source?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Are emissions of any criteria pollutant increasing by 250 tpy of any criteria pollutant at an unnamed source?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Are emissions increasing above significance levels at an existing major site?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
PSD information can be found at: <a href="http://www.tceq.texas.gov/assets/public/permitting/air/Forms/NewSourceReview/Tables/10173tbl.pdf">www.tceq.texas.gov/assets/public/permitting/air/Forms/NewSourceReview/Tables/10173tbl.pdf</a> and <a href="http://www.tceq.texas.gov/permitting/air/nav/air_docs_newsource.html">www.tceq.texas.gov/permitting/air/nav/air_docs_newsource.html</a>	
<i>If "Yes," to any of the above, a <b>PBR may not be used</b>. A PSD Permit review must be completed to authorize the project.</i>	
<i>If "No," continue to Section 4.</i>	

**Texas Commission on Environmental Quality**  
**Permit by Rule Applicability Checklist**  
**Title 30 Texas Administrative Code § 106.4**

4. <b>30 TAC § 106.4(a)(6): Federal Requirements</b>	Answer
Will all facilities under this PBR meet applicable requirements of Title 40 Code of Federal Regulations (40 CFR) Part 60, New Source Performance Standards (NSPS)?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> NA
If "Yes," which Subparts are applicable? ( <i>answer below.</i> )	
VVa	
Will all facilities under this PBR meet applicable requirements of 40 CFR Part 63, Hazardous Air Pollutants Maximum Achievable Control Technology (MACT) standards?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> NA
If "Yes," which Subparts are applicable? ( <i>answer below.</i> )	
A, UU, YY , H	
Will all facilities under this PBR meet applicable requirements of 40 CFR Part 61, National Emissions Standards for Hazardous Air Pollutants (NESHAPs)?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> NA
If "Yes," which Subparts are applicable? ( <i>answer below.</i> )	
FF	
<i>If "Yes" to any of the above, please attach a discussion of how the facilities will meet any applicable standards.</i>	
5. <b>30 TAC § 106.4(a)(7): PBR prohibition check</b>	
Are there any air permits at the site containing conditions which prohibit or restrict the use of PBRs?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<i>If "Yes," PBRs may not be used or their use must meet the restrictions of the permit. A new permit or permit amendment may be required.</i>	
List permit number(s):	
6. <b>30 TAC § 106.4(a)(8): NO<sub>x</sub> Cap and Trade</b>	
Is the facility located in Harris, Brazoria, Chambers, Fort Bend, Galveston, Liberty, Montgomery, or Waller County?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<i>If "Yes," answer the question below.</i>	
<i>If "No," continue to Section 7.</i>	
Will the proposed facility or group of facilities obtain required allowances for NO <sub>x</sub> if they are subject to 30 TAC Chapter 101, Subchapter H, Division 3 (relating to the Mass Emissions Cap and Trade Program)?	<input type="checkbox"/> YES <input type="checkbox"/> NO

**Texas Commission on Environmental Quality**  
**Permit by Rule Applicability Checklist**  
**Title 30 Texas Administrative Code § 106.4**

<b>7. Highly Reactive Volatile Organic Compounds (HRVOC) check</b>		
Is the facility located in Harris County?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
<i>If "Yes," answer the next question. If "No," skip to the box below.</i>		
Will the project be constructed after June 1, 2006?	<input type="checkbox"/> YES <input type="checkbox"/> NO	
<i>If "Yes," answer the next question.</i>		
<i>If "No," skip to the box below.</i>		
Will one or more of the following HRVOC be emitted as a part of this project?	<input type="checkbox"/> YES <input type="checkbox"/> NO	
<i>If "Yes," complete the information below:</i>		
<b>Information</b>	<b>lb/hr</b>	<b>tpy</b>
▶ 1,3-butadiene		
▶ all isomers of butene (e.g., isobutene [2-methylpropene or isobutylene])		
▶ alpha-butylene (ethylethylene)		
▶ beta-butylene (dimethylethylene, including both cis- and trans-isomers)		
▶ ethylene		
▶ propylene		
Is the facility located in Brazoria, Chambers, Fort Bend, Galveston, Liberty, Montgomery, or Waller County?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
<i>If "Yes," answer the next question. If "No," the checklist is complete.</i>		
Will the project be constructed after June 1, 2006?	<input type="checkbox"/> YES <input type="checkbox"/> NO	
<i>If "Yes," answer the next question. If "No," the checklist is complete.</i>		
Will one or more of the following HRVOC be emitted as a part of this project?	<input type="checkbox"/> YES <input type="checkbox"/> NO	
<i>If "Yes," complete the information below:</i>		
<b>Information</b>	<b>lb/hr</b>	<b>tpy</b>
▶ ethylene		
▶ propylene		



**Title 30 Texas Administrative Code § 106.262**  
**Permit by Rule (PBR) Checklist**  
**Facilities (Emission and Distance Limitations)**  
**Texas Commission on Environmental Quality**

The following checklist is designed to help you confirm that you meet Title 30 Texas Administrative Code § 106.262 (30 TAC § 106.262) requirements. If you do not meet all the requirements, you may alter the project design or operation in such a way that all the requirements of the PBR are met or you may obtain a construction permit. The PBR forms, tables, checklists, and guidance documents are available from the Texas Commission on Environmental Quality (TCEQ), Air Permits Division website at, [www.tceq.texas.gov/nav/permits/air\\_permits.html](http://www.tceq.texas.gov/nav/permits/air_permits.html).

For additional assistance with your application, including resources to help calculate your emissions, please visit the Small Business and Local Government Assistance (SBLGA) webpage at the following link: [www.TexasEnviroHelp.org](http://www.TexasEnviroHelp.org)

Check the Most Appropriate Answer	
Is a description or checklist of how this claim meets the general requirements for the use of PBRs in 30 TAC § 106.4 attached?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
a Does this project represent a physical or operational change to an NSR permitted facility in which the result of the project is an increase in <i>only</i> annual emissions with no impact to the current authorized hourly emission rate? <sup>1</sup>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
b1. Is this claim for construction of a facility authorized in another section of this chapter or for which a standard permit is in effect? <i>If "YES," this PBR cannot be used to authorize emissions from the project.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
b2. Is this claim for any change to any facility authorized under another section of this chapter or authorized under a standard permit? <i>If "YES," this PBR cannot be used to authorize emissions from the project.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
c. Is the facility authorized under another section of this chapter or under a standard permit? <i>If "YES," subsection (a)(2) and (3) of this section may be used to qualify the use of other chemicals at the facility.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
a1. Are facilities or changes located at least 100 feet from any recreational area or residence or other structure not occupied or used solely by the owner or operator of the facilities or the owner of the property upon which the facilities are located?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
a2. Are new or increased emissions, including fugitives, emitted in a quantity less than five tons per year or in a quantity less than E as determined by using the equation $E=L/K$ ? <sup>2</sup> See Table 262 Figures 1 and 2. <i>If "YES," the notification shall include the 106.261 and 106.262 Workbook, a description of the project, calculations for all emissions being claimed under this PBR:</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Chemical:	
L value:	
D:	
K:	

<sup>1</sup> Project emission increases associated with a change to a facility that only result in an annual emissions increase can be authorized as part of the PBR claim if the following information is met: 1) the hourly emissions stay at or below current authorized emission limits; 2) there is not a change to any underlying air authorizations for the applicable units associated with BACT or health and environmental impacts; and 3) this claim is certified via PI-7-CERT. The annual emission increases associated with the PBR claim may not circumvent major new source review requirements under 30 TAC Chapter 116.

<sup>2</sup>Any upstream and/or downstream actual emission increases that result from a project for which this PBR is claimed need to be authorized appropriately. Any associated upstream and/or downstream emissions authorized as part of the PBR claim will need to be included as part of the total new or increased emissions, unless: 1) these emissions stay at or below current authorized emission limits; 2) there is not a change to any underlying air authorizations for the applicable units associated with BACT, health and environmental impacts, or other representations (i.e. construction plans, operating procedures, throughputs, maximum emission rates, etc.); and 3) this claim is certified via PI-7 CERT. Notwithstanding the exclusion of any upstream and/or downstream emissions under this PBR claim, the total of all emission increases, including upstream and/or downstream actual emission increases, are required to be part of the PBR registration to determine major new source review applicability under Title 30 TAC Chapter 116. The emission increases associated with the PBR claim and all upstream and/or downstream actual emission increases may not circumvent major new source review requirements under 30 TAC Chapter 116.

**Title 30 Texas Administrative Code § 106.262**  
**Permit by Rule (PBR) Checklist**  
**Facilities (Emission and Distance Limitations)**  
**Texas Commission on Environmental Quality**

Check the Most Appropriate Answer	
a3. Is this checklist attached to a Form PI-7 within ten days following the installation or modification of the facilities? <i>If "YES," the notification shall include the 106.261 and 106.262 Workbook, a description of the project, calculations, and data identifying specific chemical names, L values, and a description of pollution control equipment, if any.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
a4. Are one or more of the following chemicals is handled for this registration?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
(Check all that apply) <i>If "YES," answer the following four questions.</i>	
<input type="checkbox"/> acrolein <span style="margin-left: 100px;"><input type="checkbox"/> diazomethane</span>	<input type="checkbox"/> hydrogen sulfide <span style="margin-left: 100px;"><input type="checkbox"/> ozone</span>
<input type="checkbox"/> allyl chloride <span style="margin-left: 100px;"><input type="checkbox"/> diborane</span>	<input type="checkbox"/> ketene <span style="margin-left: 100px;"><input type="checkbox"/> pentaborne</span>
<input type="checkbox"/> ammonia (anhydrous) <span style="margin-left: 100px;"><input type="checkbox"/> diglycidyl ether</span>	<input type="checkbox"/> methylamine <span style="margin-left: 100px;"><input type="checkbox"/> perchloromethyl mercaptan</span>
<input type="checkbox"/> arsine <span style="margin-left: 100px;"><input type="checkbox"/> dimethylhydrazine</span>	<input type="checkbox"/> methyl bromide <span style="margin-left: 100px;"><input type="checkbox"/> perchloryl fluoride</span>
<input type="checkbox"/> boron trifluoride <span style="margin-left: 100px;"><input type="checkbox"/> ethyleneimine</span>	<input type="checkbox"/> methyl hydrazine <span style="margin-left: 100px;"><input type="checkbox"/> phosgene</span>
<input type="checkbox"/> bromine <span style="margin-left: 100px;"><input type="checkbox"/> ethyl mercaptan</span>	<input type="checkbox"/> methyl isocyanate <span style="margin-left: 100px;"><input type="checkbox"/> phosphine</span>
<input type="checkbox"/> carbon disulfide <span style="margin-left: 100px;"><input type="checkbox"/> fluorine</span>	<input type="checkbox"/> methyl mercaptan <span style="margin-left: 100px;"><input type="checkbox"/> phosphorus trichloride</span>
<input type="checkbox"/> chlorine <span style="margin-left: 100px;"><input type="checkbox"/> formaldehyde (anhydrous)</span>	<input type="checkbox"/> nickel carbonyl <span style="margin-left: 100px;"><input type="checkbox"/> selenium</span>
<input type="checkbox"/> chlorine dioxide <span style="margin-left: 100px;"><input type="checkbox"/> hydrogen bromide</span>	<input type="checkbox"/> nitric acid <span style="margin-left: 100px;"><input type="checkbox"/> hexafluoride stibine</span>
<input type="checkbox"/> chlorine trifluoride <span style="margin-left: 100px;"><input type="checkbox"/> hydrogen chloride</span>	<input type="checkbox"/> nitric oxide <span style="margin-left: 100px;"><input type="checkbox"/> liquefied sulfur dioxide</span>
<input type="checkbox"/> chloroacetaldehyde <span style="margin-left: 100px;"><input type="checkbox"/> hydrogen cyanide</span>	<input type="checkbox"/> nitrogen dioxide <span style="margin-left: 100px;"><input type="checkbox"/> sulfur pentafluoride</span>
<input type="checkbox"/> chloropicrin <span style="margin-left: 100px;"><input type="checkbox"/> hydrogen fluoride</span>	<input type="checkbox"/> oxygen difluoride <span style="margin-left: 100px;"><input type="checkbox"/> tellurium hexafluoride</span>
<input type="checkbox"/> chloroprene <span style="margin-left: 100px;"><input type="checkbox"/> hydrogen selenide</span>	

**Title 30 Texas Administrative Code § 106.262**  
**Permit by Rule (PBR) Checklist**  
**Facilities (Emission and Distance Limitations)**  
**Texas Commission on Environmental Quality**

Check the Most Appropriate Answer	
Are all facilities are located at least 300 feet from the nearest property line and 600 feet from any off-plant receptor?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Are the cumulative amount of any of the following chemicals resulting from one or more authorizations under this section (but not including permit authorizations) less than or equal to 500 pounds on the plant property?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Are all listed chemicals handled only in unheated containers operated in compliance with the United States Department of Transportation regulation (49 Code of Federal Regulation, Parts 171-178)?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
a5. Are there any changes to or additions of any existing air pollution abatement equipment?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
a6. Will there be any visible emissions, except uncombined water, emitted to the atmosphere from any point or fugitive source in amounts greater than 5.0% opacity in any six-minute period?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A

D (feet)	K	Value Description
100	326	E=maximum allowable hourly emission, and never to exceed 6 pounds per hour.
200	200	
300	139	
400	104	
600	65	
700	54	
800	46	K=value from the table on this page. (interpolate intermediate values)
900	39	
1,000	34	
2,000	14	D=distance to the nearest off-plant receptor
3,000 or more	8	

**Table 262**  
**Limit Values (L) for use with Exemptions from Permitting § 106.262**

The values are not to be interpreted as acceptable health affects values relative to the issuance of any permits under Chapter 116 of this title (relating to Control of Air Pollution by Permits for new Construction or Modification).

Compound	Limit (L) Milligrams Per Cubic Meter
Acetone	590.
Acetaldehyde	9.
Acetone	4.
Acetonitrile	34.
Acetylene	2662.
N-Amyl Acetate	2.7
Sec-Amyl Acetate	1.1
Benzene	3.
Beryllium and Compounds	0.0005
Boron Trifluoride, as HF	0.5
Butyl Alcohol,	76.
Butyl Acrylate	19.
Butyl Chromate	0.01
Butyl Glycidyl Ether	30.
Butyl Mercaptain	0.3
Butyraldehyde	1.4
Butyric Acid	1.8
Butyronitrile	22.
Carbon Tetrachloride	12.
Chloroform	10.
Chlorophenol	0.2
Chloroprene	3.6
Chromic Acid	0.01
Chromium Metal, Chromium II and III Compounds	0.1
Chromium VI Compounds	0.01
Coal Tar Pitch Volatiles	0.1
Creosote	0.1
Cresol	0.5
Cumene	50.
Dicyclopentadiene	3.1
Diethylaminoethanol	5.5

**Table 262**  
**Limit Values (L) for use with Exemptions from Permitting § 106.262**

The values are not to be interpreted as acceptable health affects values relative to the issuance of any permits under Chapter 116 of this title (relating to Control of Air Pollution by Permits for new Construction or Modification).

Compound	Limit (L) Milligrams Per Cubic Meter
Diisobutyl Ketone	63.9
Dimethyl Aniline	6.4
Dioxane	3.6
Dipropylamine	8.4
Ethyl Acrylate	0.5
Ethylene Dibromide	0.38
Ethylene Glycol	26.
Ethylene Glycol Dinitrate	0.1
Ethylidene 2-norbornene, 5	7.
Ethyl Mercaptan	0.08
Ethyl Sulfide	1.6
Glycolonitrile	5.
Halothane	16.
Heptane	350.
Hexanediamine, 1, 6	0.32
Hydrogen Chloride	1.
Hydrogen Fluoride	0.5
Hydrogen Sulfide	1.1
Isoamyl Acetate	133.
Isoamyl Alcohol	15.
Isobutyronitrile	22.
Kepone	0.001
Kerosene	100.
Malononitrile	8.
Mesityl Oxide	40.
Methyl Acrylate	5.8
Methyl Amyl Ketone	9.4
Methyl-T-Butyl Ether	45.
Methyl Butyl Ketone	4.
Methyl Disulfide	2.2

**Table 262**  
**Limit Values (L) for use with Exemptions from Permitting § 106.262**

The values are not to be interpreted as acceptable health affects values relative to the issuance of any permits under Chapter 116 of this title (relating to Control of Air Pollution by Permits for new Construction or Modification).

Compound	Limit (L) Milligrams Per Cubic Meter
Methylenebis (2-chloroaniline) (MOCA)	0.003
Methylene Chloride	26.
Methyl Isoamyl Ketone	5.6
Methyl Mercaptan	0.2
Merthyl Methacrylate	34.
Methyl Propyl Ketone	530.
Methyl Sulfide	0.3
Mineral Spirits	350.
Naphtha	350.
Nickel, Inorganic Compounds	0.015
Nitroglycerine	0.1
Nitropropane	5.
Octane	350.
Parathion	0.05
Pentane	350.
Perchloroethylene	33.5
Petroleum Ether	350.
Phenyl Mercaptan	0.4
Propionitrile	14.
Propyl Acetate	62.6
Propylene Oxide	20.
Propyl Mercaptan	0.23
Silica-amorphous-precipitated, silica gel	4.
Silicon Carbide	4.

**Table 262**  
**Limit Values (L) for use with Exemptions from Permitting § 106.262**

The values are not to be interpreted as acceptable health affects values relative to the issuance of any permits under Chapter 116 of this title (relating to Control of Air Pollution by Permits for new Construction or Modification).

Compound	Limit (L) Milligrams Per Cubic Meter
Stoddard Solvent	350.
Styrene	21.
Succionitrile	20.0
Tolidin	0.02
Trichloroethylene	135.
Trinethylamine	0.1
Valeric Acid	0.34
Vinyl Acetate	15.0
Vinyl Chloride	2.0

**Note:** The time weighted average (TWA) threshold Limit Value (TLV) published by the American Conference of Governmental Industrial Hygienists (ACGIH), in its TLVs and BEIs guide (1997 Edition) shall be used for compounds not included in the table. The Short-Term Exposure Level (STEL) or Ceiling Limit (annotated with a "C") published by the ACGIH shall be used for compounds that do not have a published TWA TLV. This section cannot be used if the compound is not listed in the table or does not have a published TWA TLV, STEL, or Ceiling Limit in the ACGIH TLVs and BEIs guide.

## **Attachment 7 – Miscellaneous Discussions**

### **Federal Requirement Discussion**

The new equipment associated with this registration will be regulated via 40 CFR 60 Subpart VVa, 40 CFR 61 Subpart FF and 40 CFR 63 Subparts A, H, UU, YY and FFFF; therefore, the components will be incorporated into the facility's existing fugitive monitoring program, as applicable.

### **TCEQ Pollutant Watch List Discussion**

GCGV and Gregory, TX area are not currently included on the TCEQ Air Pollutant Watch List.

### **MSS Emission Discussion**

A Maintenance, Start-Up and Shut Down (MSS) Permit is maintained by GCGV which allows for a predetermined amount of emissions to be released during times of planned maintenance, startup and shutdown of process equipment. Any MSS emissions for the projects included in this report are the result of planned MSS activities and will not exceed or require an increase of the authorized MSS limits due to the installation of these projects.

The generation of MSS emissions to free and clear equipment to facilitate the installation of new fugitive equipment has been authorized under NSR Permit 146425.