



Permit By Rule §106.261 Annual Registration for LPG Unit

Prepared For
Texas Commission on Environmental Quality

On behalf of
Energy Transfer Nederland Terminal, LLC



March 2025

Project No. P4431

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1 INTRODUCTION

Energy Transfer Nederland Terminal, LLC (Energy Transfer) is submitting this annual Permit by Rule (PBR) registration for the Liquefied Natural Gas (LPG) Unit of the Nederland Terminal in Jefferson County, Texas as required by Title 30 of the Texas Administrative Code (30 TAC) §106.261 (Facilities – Emission Limitations).

Energy Transfer used PBR §106.261 to authorize emissions from small project modifications in Calendar Year (CY) 2024. Emissions from each project were below the PBR §106.261(a)(7) threshold of five (5) tons per year (tpy) emissions increase. A brief description of each project is included in Section 2. None of the project changes resulted in a production or capacity increase, and there were no upstream or downstream impacts.

1.1 Facility Information

Energy Transfer owns and operates the LPG Unit at the Nederland Terminal, a for-hire terminal that handles various LPG products such as ethane, propane, and butane, located in Jefferson County, Texas. The facility is located at 2300 North Twin City Hwy, Nederland, Texas, 77627. The LPG Unit at the Nederland Terminal is identified by the TCEQ Customer Number CN605971894, the TCEQ Regulated Entity Number RN111476404 and by the TCEQ Account Number JEA041N. The Nederland LPG Terminal is considered a major source for volatile organic compounds (VOC) and hazardous air pollutants (HAP) as defined in 30 TAC §122.10. The sources represented in this annual PBR are associated with New Source Review (NSR) Permit No. 160710.

1.2 Purpose of Submittal

This application is submitted to authorize equipment leak fugitive emissions from various projects completed at the LPG Unit during Calendar Year (CY) 2024. In accordance with 30 TAC §106.261(7)(B), this submittal is made by March 31 of the following year (2025). This PBR registration is submitted to authorize the fugitive emissions associated with new piping components only. No other increases in allowable emission rates are requested as part of this PBR registration.

1.3 Application Contents

The following materials are included in this registration application to provide support for the authorization:

- The project description and evaluation of major new source applicability are included in **Section 2**;
- A discussion of the emission calculations is included in **Section 3**;
- A discussion of PBR applicability is included in **Section 4**;
- A Form PI-7-CERT, and PBR applicability checklists are included in **Appendix A**; and
- Emission calculations are provided in **Appendix B**.

2 PROJECT DESCRIPTION

2.1 Fugitive Component Additions

One (1) minor project completed in 2024 at the LPG Unit was authorized under 30 TAC §106.261. This project required the addition of new piping components (i.e., fugitive emission sources). Detailed information on the project is shown in the following table.

Project Name	Project Description
Project 1	Addition of fugitive components due to maintenance work at the LPG unit.

2.2 Evaluation of Major New Source Review Applicability

The total VOC emissions increase for the project is less than 25 tpy, which satisfies the limitations of 30 TAC §106.4.

As specified in 30 TAC §106.4(a)(2), a project cannot be authorized under a PBR if it is subject to either of the following two types of Major NSR requirements:

- **Non-attainment NSR (NNSR):** The Nederland LPG Terminal is located in Jefferson County, which is classified as attainment/unclassifiable for all criteria pollutants. Therefore, this project is not subject to NNSR rule requirements.
- **Prevention of Significant Deterioration (PSD):** The Nederland LPG Terminal is located in Jefferson County, which is classified as attainment/unclassifiable for all criteria pollutants. The proposed emissions increase for VOCs for this projects is 0.70 tpy; therefore, a contemporaneous netting review is not required, and a PSD review is not triggered.

3 EMISSION CALCULATION METHODOLOGIES

Fugitive emission rate calculations are based on the TCEQ Air Permit Technical Guidance for Chemical Sources: Fugitive Guidance (June 2018). The Synthetic Organic Chemical Manufacturing Industry (SOCMI) without Ethylene emission factors were used in the calculations. Emission control credits were based on the 28VHP monitoring program. Additionally, Energy Transfer Nederland LPG Terminal takes advantage of the weekly audible, visual and olfactory (AVO) inspections for flanges/connectors. This allows for a 30% control of flanges and connectors. Detailed calculations are provided in **Appendix B**.

4 PBR APPLICABILITY

4.1 General PBR Requirements (§106.4)

Adopted to be effective November 15, 1996; amended to be effective April 17, 2014.

(a) *To qualify for a permit by rule, the following general requirements must be met.*

- (1) *Total actual emissions authorized under permit by rule from the facility shall not exceed the following limits, as applicable:*
 - (A) *250 tons per year (tpy) of carbon monoxide (CO) or nitrogen oxides (NO_x);*
 - (B) *25 tpy of volatile organic compounds (VOC), sulfur dioxide (SO₂), or inhalable particulate matter (PM);*
 - (C) *15 tpy of particulate matter with diameters of 10 microns or less (PM₁₀);*
 - (D) *10 tpy of particulate matter with diameters of 2.5 microns or less (PM_{2.5}); or*
 - (E) *25 tpy of any other air contaminant except:*
 - (F) *water, nitrogen, ethane, hydrogen, and oxygen; and*
 - (G) *notwithstanding any provision in any specific permit by rule to the contrary, greenhouse gases as defined in §101.1 of this title (relating to Definitions).*

The proposed emissions to be authorized under PBR are below the specified levels.

- (2) *Any facility or group of facilities, which constitutes a new major stationary source, as defined in §116.12 of this title (relating to Nonattainment and Prevention of Significant Deterioration Review Definitions), or any modification which constitutes a major modification, as defined in §116.12 of this title, under the new source review requirements of the Federal Clean Air Act (FCAA), Part D (Nonattainment) as amended by the FCAA Amendments of 1990, and regulations promulgated thereunder, must meet the permitting requirements of Chapter 116, Subchapter B of this title (relating to New Source Review Permits) and cannot qualify for a permit by rule under this chapter. Persons claiming a permit by rule under this chapter should see the requirements of §116.150 of this title (relating to New Major Source or Major Modification in Ozone Nonattainment Areas) to ensure that any applicable netting requirements have been satisfied.*

The proposed project is not a new major stationary source or a major modification as defined in 30 TAC §116.12.

- (3) *Any facility or group of facilities, which constitutes a new major stationary source, as defined in 40 Code of Federal Regulations (CFR) §52.21, or any change which constitutes a major modification, as defined in 40 CFR §52.21, under the new source review requirements of the FCAA, Part C (Prevention of Significant Deterioration) as amended by the FCAA Amendments of 1990, and regulations promulgated thereunder because of emissions of air contaminants other than greenhouse gases, must meet the permitting requirements of Chapter 116, Subchapter B of this title and cannot qualify for a permit by rule under this chapter. Notwithstanding any provision in any specific permit by rule to the contrary, a new major stationary source or major*

modification which is subject to Chapter 116, Subchapter B, Division 6 of this title due solely to emissions of greenhouse gases may use a permit by rule under this chapter for air contaminants that are not greenhouse gases. However, facilities or projects which require a prevention of significant deterioration permit due to emissions of greenhouse gases may not commence construction or operation until the prevention of significant deterioration permit is issued.

The proposed project is not a major modification as defined in 30 TAC §116.12 or 40 CFR §52.21.

- (4) *Unless at least one facility at an account has been subject to public notification and comment as required in Chapter 116, Subchapter B or Subchapter D of this title (relating to New Source Review Permits or Permit Renewals), total actual emissions from all facilities permitted by rule at an account shall not exceed 250 tpy of CO or NO_x; or 25 tpy of VOC or SO₂ or PM₁₀; or 15 tpy of PM_{2.5}; or 25 tpy of any other air contaminant except water, nitrogen, ethane, hydrogen, oxygen, and GHGs (as specified in §106.2 of this title (relating to Applicability)).*

At least one facility at this account has been subject to public notification and comment as required in Chapter 116.

- (5) *Construction or modification of a facility commenced on or after the effective date of a revision of this section or the effective date of a revision to a specific permit by rule in this chapter must meet the revised requirements to qualify for a permit by rule.*

The proposed project is covered by permits by rule under 30 TAC §106 that are effective at the time the changes are implemented.

- (6) *A facility shall comply with all applicable provisions of the FCAA, §111 (Federal New Source Performance Standards) and §112 (Hazardous Air Pollutants), and the new source review requirements of the FCAA, Part C and Part D and regulations promulgated thereunder.*

Energy Transfer Nederland LPG Terminal will comply with all applicable requirements listed above.

- (7) *There are no permits under the same commission account number that contain a condition or conditions precluding the use of a permit by rule under this chapter.*

There are no permits under the same commission account number that preclude the use of a PBR.

- (8) *The proposed facility or group of facilities shall obtain allowances for NO_x if they are subject to Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program).*

The facilities authorized in this PBR are not subject to the Mass Emissions Cap and Trade Program.

- (b) *No person shall circumvent by artificial limitations the requirements of §116.110 of this title (relating to Applicability).*

Energy Transfer Nederland LPG Terminal will not circumvent the requirements of 30 TAC §116.110.

- (c) *The emissions from the facility shall comply with all rules and regulations of the commission and with the intent of the Texas Clean Air Act (TCAA), including protection of health and property of the public, and all emissions control equipment shall be maintained in good condition and operated properly during operation of the facility.*

Energy Transfer Nederland LPG Terminal will comply with all applicable requirements above.

- (d) *Facilities permitted by rule under this chapter are not exempted from any permits or registrations required by local air pollution control agencies. Any such requirements must be in accordance with Texas Health and Safety Code, §382.113 and any other applicable law.*

The proposed project is not subject to any additional local air pollution control agency permitting or registration requirements.

4.2 Recordkeeping Requirements (§106.8)

Adopted to be effective November 1, 2001.

- (a) *Owners or operators of facilities and sources that are de minimis as designated in §116.119 of this title (relating to De Minimis Facilities or Sources) are not subject to this section.*

The facility and sources affected by the proposed project are not considered de minimis.

- (b) *Owners or operators of facilities operating under a permit by rule (PBR) in Subchapter C of this chapter (relating to Domestic and Comfort Heating and Cooling) or under those PBRs that only name the type of facility and impose no other conditions in the PBR itself do not need to comply with specific recordkeeping requirements of subsection (c) of this section. A list of these PBRs will be available through the commission's Austin central office, regional offices, and the commission's website. Upon request from the commission or any air pollution control program having jurisdiction, claimants must provide information that would demonstrate compliance with §106.4 of this title (relating to Requirements for Permitting by Rule), or the general requirements, if any, in effect at the time of the claim, and the PBR under which the facility is authorized.*

The PBRs claimed are not specified in the above requirement.

- (c) *Owners or operators of all other facilities authorized to be constructed and operate under a PBR must retain records as follows:*

- (1) *maintain a copy of each PBR and the applicable general conditions of §106.4 of this title or the general requirements, if any, in effect at the time of the claim under which the facility is operating. The PBR and general requirements claimed should be the version in effect at the time of construction or installation or changes to an existing facility, whichever is most recent. The PBR holder may elect to comply with a more recent version of the applicable PBR and general requirements;*

A copy of the PBRs claimed will be maintained in Energy Transfer Nederland LPG Terminal's files.

- (2) *maintain records containing sufficient information to demonstrate compliance with the following:*

- (A) *all applicable general requirements of §106.4 of this title or the general requirements, if any, in effect at the time of the claim; and*

Compliance with the requirements of §106.4 are addressed in Section 4.1.

- (B) *all applicable PBR conditions;*

Compliance with the requirements of §106.261 is addressed in Section 4.3.

- (3) *keep all required records at the facility site. If, however, the facility normally operates unattended, records must be maintained at an office within Texas having day-to-day operational control of the plant site;*

All records will be maintained at the facility for a period of at least 5 years.

- (4) *make the records available in a reviewable format at the request of personnel from the commission or any air pollution control program having jurisdiction;*

The required records will be maintained in Energy Transfer Nederland LPG Terminal's environmental files and made available for review upon the request of the TCEQ.

- (5) *beginning April 1, 2002, keep records to support a compliance demonstration for any consecutive 12-month period. Unless specifically required by a PBR, records regarding the quantity of air contaminants emitted by a facility to demonstrate compliance with §106.4 of this title prior to April 1, 2002 are not required under this section; and*

All required records will be maintained to demonstrate compliance for any consecutive 12-month period.

- (6) *for facilities located at sites designated as major in accordance with §122.10(13) of this title (relating to General Definitions) or subject to or potentially subject to any applicable federal requirement, retain all records demonstrating compliance for at least five years. For facilities located at all other sites, all records demonstrating compliance must be retained for at least two years. These record retention requirements supersede any retention conditions of an individual PBR.*

All required records will be retained for at least five years.

4.3 Specific PBR Requirements (§106.261)

Adopted to be effective March 14, 1997; amended to be effective November 1, 2003.

(a) Except as specified under subsection (b) of this section, facilities, or physical or operational changes to a facility, are permitted by rule provided that all of the following conditions of this section are satisfied.

- (1) The facilities or changes shall be 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.*

The fugitive area is located at least 100 feet from the property line.

- (2) Total new or increased emissions, including fugitives, shall not exceed 6.0 pounds per hour (lb/hr) and ten tons per year of the following materials: acetylene, argon, butane, crude oil, refinery petroleum fractions (except for pyrolysis naphthas and pyrolysis gasoline) containing less than ten volume percent benzene, carbon monoxide, cyclohexane, cyclohexene, cyclopentane, ethyl acetate, ethanol, ethyl ether, ethylene, fluorocarbons Numbers 11, 12, 13, 14, 21, 22, 23, 113, 114, 115, and 116, helium, isohexane, isopropyl alcohol, methyl acetylene, methyl chloroform, methyl cyclohexane, neon, nonane, oxides of nitrogen, propane, propyl alcohol, propylene, propyl ether, sulfur dioxide, alumina, calcium carbonate, calcium silicate, cellulose fiber, cement dust, emery dust, glycerin mist, gypsum, iron oxide dust, kaolin, limestone, magnesite, marble, pentaerythritol, plaster of paris, silicon, silicon carbide, starch, sucrose, zinc stearate, or zinc oxide.*

Emissions of propane will be less than 6.0 lb/hr and 10 tpy. This project does not include increases from any other listed pollutants.

- (3) Total new or increased emissions, including fugitives, shall not exceed 1.0 lb/hr of any chemical having a limit value (L) greater than 200 milligrams per cubic meter (mg/m³) as listed and referenced in Table 262 of §106.262 of this title (relating to Facilities (Emission and Distance Limitations)) or of any other chemical not listed or referenced in Table 262. Emissions of a chemical with a limit value of less than 200 mg/m³ are not allowed under this section.*

This project does not include increases from any pollutant listed in Table 262. All chemicals authorized by this PBR are included under 106.261(a)(2).

- (4) For physical changes or modifications to existing facilities, there shall be no changes to or additions of any air pollution abatement equipment.*

This project does not include any changes to or additions of any air pollution abatement equipment.

- (5) *Visible emissions, except uncombined water, to the atmosphere from any point or fugitive source shall not exceed 5.0% opacity in any six-minute period.*

There are no visible emissions associated with this project.

- (6) *For emission increases of five tons per year or greater, notification must be provided using Form PI-7 within ten days following the installation or modification of the facilities. The notification shall include a description of the project, calculations, data identifying specific chemical names, limit values, and a description of pollution control equipment, if any.*
- (7) *For emission increases of less than five tons per year, notification must be provided using either:*
- (A) *Form PI-7 within ten days following the installation or modification of the facilities. The notification shall include a description of the project, calculations, data identifying specific chemical names, limit values, and a description of pollution control equipment, if any; or*
- (B) *Form PI-7 by March 31 of the following year summarizing all uses of this permit by rule in the previous calendar year. This annual notification shall include a description of the project, calculations, data identifying specific chemical names, limit values, and a description of pollution control equipment, if any.*

Energy Transfer Nederland LPG Terminal is submitting within the required timeframe for emission increases less than five tons per year.

(b) The following are not authorized under this section:

- (1) *construction of a facility authorized in another section of this chapter or for which a standard permit is in effect; and*
- (2) *any change to any facility authorized under another section of this chapter or authorized under a standard permit.*

The equipment associated with this project is not covered under another section of Chapter 106 nor by a standard permit.

APPENDIX A: APPLICATION FORMS AND TABLES

The following attachments are included in this appendix:

- Table 1(a) Emission Point Summary;
- Form PI-7-CERT;
- §106.4 General Checklist; and
- Permit by Rule §106.261/262 TCEQ Workbook.

**Texas Commission on Environmental Quality
Table 1(a) Emission Point Summary
Air Contaminant Data (Page 1)**

Date:	March 2025
Permit No.:	TBD
Regulated Entity No.:	RN111476404
Area Name:	Energy Transfer Nederland LPG Terminal
Customer Reference No.:	CN605971894

Review of application and issuance of permits will be expedited by supplying all necessary information requested on the Table

EPN	FIN	Name	Component or Air Contaminant Name	Air Contaminant Emission Rate lb/hr	Air Contaminant Emission Rate TPY
1-FUG	1-FUG	Fugitive Emissions	VOC	0.16	0.70

EPN = Emission Point Number
FIN = Facility Identification Number

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

I. Registrant Information
A. Company or Other Legal Customer Name: Energy Transfer Nederland Terminal LLC
Company Official Contact Information (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Other _____)
Name: Greg S. Mesthos
Title: VP – Nederland Operations
Mailing Address: PO Box 758
City: Nederland
State: TX
ZIP Code: 77627
Phone: (409)-721-4404
Fax:
Email Address: Greg.Mesthos@energytransfer.com
<i>All PBR registration responses will be sent via email.</i>
A. Technical Contact Information (<input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input checked="" type="checkbox"/> Ms. <input type="checkbox"/> Other _____)
Name: Julie W. Birdsong
Title: Senior Specialist - Environmental
Company Name: Energy Transfer Nederland Terminal LLC
Mailing Address: PO Box 758
City: Nederland
State: TX
ZIP Code: 77627
Phone Number: (409) 721-4828
Fax Number:
Email Address: julie.birdsong@energytransfer.com

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II. Facility and Site Information
A. Name and Type of Facility
Facility Name: Nederland LPG Terminal
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: 2300 North Twin City Hwy
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: Nederland
County: Jefferson
ZIP Code: 77627
C. TCEQ Core Data Form
Is the Core Data Form (TCEQ Form Number 10400) attached? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
If "NO," provide customer reference number (CN) and regulated entity number (RN) below.
Customer Reference Number (CN): CN605971894
Regulated Entity Number (RN): RN111476404
D. TCEQ Account Identification Number (if known): JEA041N
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.)
106.261 Facilities (Emission Limitations)
106.
106.
106.

Certification and Registration for Permits by Rule
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II. Facility and Site Information <i>(continued)</i>
G. Historical Standard Exemption or PBR
Are you claiming a historical standard exemption or PBR? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
If "YES," enter rule number(s) and associated effective date in the spaces provided below.
Rule Number: Effective Date:
Rule Number: Effective Date:
H. Previous Standard Exemption or PBR Registration Number
Is this authorization for a change to an existing facility previously authorized under a standard exemption or PBR? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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:
I. Other Facilities at this Site Authorized by Standard Exemption, PBR, or Standard Permit
Are there any other facilities at this site that are authorized by an Air Standard Exemption, PBR, or Standard Permit? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
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.
Standard Exemption, PBR Registration, and Standard Permit Registration Number(s): 172371
Effective Date: 4/11/2023
Standard Exemption, PBR Registration, and Standard Permit Registration Number(s): 175827
Effective Date: 4/19/2024
Standard Exemption, PBR Registration, and Standard Permit Registration Number(s):
Effective Date:
J. Other Air Preconstruction Permits
Are there any other air preconstruction permits at this site? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
If "YES," enter permit number(s) in the spaces provided below.
160710
K. Affected Air Preconstruction Permits
Does the PBR being claimed directly affect any permitted facility? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

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II. Facility and Site Information <i>(continued)</i>
If "YES," enter the permit number(s) in the spaces provided below.
160710
L. Federal Operating Permit (FOP) Requirements (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? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> To Be Determined
If the site currently has an existing FOP, enter the permit number: 04508
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 checked="" type="checkbox"/> To be Determined <input 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 type="checkbox"/> SOP application/revision (submitted or under APD review)
III. Fee Information <i>(See Section VII. for address to send fee or go to www.tceq.texas.gov/epay to pay online.)</i>
A. Fee Requirements
Is a fee required per Title 30 TAC § 106.50? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
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. <input type="checkbox"/>
2. Registration is within six months of an initial PBR review, and it is addressing deficiencies, administrative changes, or other allowed changes. <input type="checkbox"/>
3. Registration is for a remediation project (30 TAC § 106.533). <input type="checkbox"/>
B. Fee Amount
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. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
This business has less than \$6 million dollars in annual gross receipts. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
This registration is submitted by a governmental entity with a population of less than 10,000. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
This registration is submitted by a non-profit organization. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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III. Fee Information (See Section VII. for address to send fee or go to www.tceq.texas.gov/epay 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: \$450.00
Was the fee paid online? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
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.
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? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Did you demonstrate that the individual requirements of the specific PBR are met? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
B. Confidential Information Included (If confidential information is submitted with this registration, all confidential pages must be properly marked "CONFIDENTIAL.") <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
C. Process Flow Diagram: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
D. Process Description: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
E. Maximum Emissions Data and Calculations: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Note: If the facilities listed in this registration are subject to the Mass Emissions Cap & Trade program under 30 TAC Chapter 101, Subchapter H, Division 3 , the owner/operator of these facilities must possess NO _x allowances equivalent to the actual NO _x emissions from these facilities.
F. Is this certification being submitted to certify the emissions for the entire site? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
If "NO," include a summary of the specific facilities and emissions being certified.
G. Table 1(a) (Form 10153) Emission Point Summary: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
H. Distances from Property Line and Nearest Off-Property Structure
Distance from this facility's emission release point to the nearest property line: >100 feet
Distance from this facility's emission release point to the nearest off-property structure: >100 feet

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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): **2024**

Projected Start of Operation (provide date): **2024**

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.

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): **Greg S. Mesthos**

Signature (original signature required)

Signed via STEERS

Date: Signed via STEERS

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.

1. 30 TAC § 106.4(a)(1) and (4): Emission Limits	Answer
List emissions in tpy for each facility (add additional pages or table if needed): See Table B-1	
Are the SO ₂ , PM ₁₀ , VOC, or other air contaminant emissions claimed for each facility in this PBR submittal less than 25 tpy?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Are the NO _x 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 PBR cannot be claimed.</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 ₂ , PM ₁₀ , VOC, or other emissions claimed for all facilities in this PBR submittal less than 25 tpy?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are the NO _x 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 PBR cannot be claimed. 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. 30 TAC § 106.4(a)(2): Nonattainment Check	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 _x 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 _x 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: www.tceq.texas.gov/permitting/air/forms/newsource/tables/nsr_table8.html and www.tceq.texas.gov/permitting/air/nav/air_docs_newsource.html	
<i>If "Yes," to any of the above, the project is a major source or a major modification and a PBR may not be used. A Nonattainment Permit review must be completed to authorize this project. If "No," continue to Section 3.</i>	
3. 30 TAC § 106.4(a)(3): Prevention of Significant Deterioration (PSD) check	
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: www.tceq.texas.gov/assets/public/permitting/air/Forms/NewSourceReview/Tables/10173tbl.pdf and www.tceq.texas.gov/permitting/air/nav/air_docs_newsource.html	
<i>If "Yes," to any of the above, a PBR may not be used. 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. 30 TAC § 106.4(a)(6): Federal Requirements	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 type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
If "Yes," which Subparts are applicable? (<i>answer below.</i>)	
Will all facilities under this PBR meet applicable requirements of 40 CFR Part 63, Hazardous Air Pollutants Maximum Achievable Control Technology (MACT) standards?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
If "Yes," which Subparts are applicable? (<i>answer below.</i>)	
Will all facilities under this PBR meet applicable requirements of 40 CFR Part 61, National Emissions Standards for Hazardous Air Pollutants (NESHAPs)?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
If "Yes," which Subparts are applicable? (<i>answer below.</i>)	
<i>If "Yes" to any of the above, please attach a discussion of how the facilities will meet any applicable standards.</i>	
5. 30 TAC § 106.4(a)(7): PBR prohibition check	
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. 30 TAC § 106.4(a)(8): NO_x Cap and Trade	
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 _x 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

7. Highly Reactive Volatile Organic Compounds (HRVOC) check		
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>		
Information	lb/hr	tpy
▶ 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>		
Information	lb/hr	tpy
▶ ethylene		
▶ propylene		

General Information

This sheet provides general rule information for both General Facility PBRs.

Instructions:

Please fill out all input / yellow cells unless marked optional. Attach the federal applicability review to the application for each project.
An optional supplemental information field has been provided at the end of this worksheet. This field should be used for demonstration of rule or policy compliance.

I. Project Information

Requested Information	Response
Company Name	Energy Transfer Nederland Terminal LLC
Site Description	Nederland LPG Terminal
General Project Description	Annual 261 PBR for fugitive piping components
I acknowledge that I am submitting an authorized TCEQ workbook and any necessary attachments. Except for inputting the requested data and adjusting row height, I have not changed the TCEQ application workbook in any way, including but not limited to changing formulas, formatting, content, or protections.	I agree
Please indicate which rule, or both, are applicable to this project:	\$106.261
Does this project authorize a new facility, modify a New Source Review (NSR) Case-by-Case existing permitted facility, or both?	Modify Existing
Is this site only authorized under Permits by Rule?	No
Is this located at a federal NSR major source (PSD or NNSR)?	Yes
Is there an associated NSR Case-by-Case permit?	Yes
Please enter the associated NSR permit(s):	160710

II. General Rule Requirements for \$106.261 and/or \$106.262

Requested Information	Response
Has a \$106.4 checklist or compliance demonstration been included in the documentation submitted to TCEQ?	Yes
Is this registration for construction of a facility authorized in another section of this chapter or for which a standard permit is in effect?	No
Is this registration for any change to any facility authorized under another section of this chapter or authorized under a standard permit?	No
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?	Yes
Are there any changes to or additions of any existing air pollution abatement equipment?	No
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?	No
Please include the following information for any pollution control equipment related to this registration: how the equipment operates, and the control efficiency achieved.	N/A

III. Associated Emission Increases

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 below current authorized emission thresholds; 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 or APD-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.

Requested Information	Response
Is this project related to physical or operational changes to facilities authorized under an NSR Case-by-Case permit?	Yes
Please explain how all actual emission increases are authorized appropriately:	There are no upstream or downstream emission increases, only increases due to new piping components. There will be no change to underlying air authorizations associated with BACT, health, or environmental impacts, or other representations for the applicable units. This claim is certified via PI-7 CERT. The total of all emission increases for each project is included in this PBR registration.

IV. Hours of Operation

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 thresholds; 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.

Requested Information	Response
Does this project include only annual increases for permitted facilities?	No

V. Federal Applicability

Complete separate federal permitting application materials to determine applicability of Nonattainment (NA) and Prevention of Significant Deterioration (PSD) applicability, including netting if applicable. Include this analysis in your permit application.

Requested Information	Response
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Please select the county that this project is located in.	Jefferson
County attainment status as of November 4, 2022:	unclassifiable/attainment
If applicable, is this facility located within the portion of the county that is in nonattainment?	No

PSD Applicability Summary

Requested Information	Response
Is this a named source?	No
Is netting required for the PSD Analysis for this project?	No

Pollutant	Project Increase (TPY)	Threshold (TPY)	PSD Review Required?
CO			
NO _x			
PM			
PM ₁₀			
PM _{2.5}			
SO ₂			
Ozone (as VOC)	0.7	40	No
Ozone (as NO _x)			
Pb			
H ₂ S			
TRS			
Reduced sulfur compounds (including H ₂ S)			
H ₂ SO ₄			
Fluoride (excluding HF)			
CO ₂ e			
Determination:			

Determination:			

Supplemental Information (Optional)

--

[Click here to go to the \\$106.261 Checklist sheet.](#)

This sheet provides compliance demonstration and emission thresholds for 30 TAC §106.261.

Instructions:

Please fill out all input / yellow cells unless marked optional. Also, please note that emissions must be fully speciated and cannot have general categories listed (e.g.

I. General Information

Are emission increases being authorized under §106.261 five tons per year or greater?

No

The company may submit a notification by March 31 of the following year summarizing all uses of this permit by rule in the previous calendar year.

Is this project an annual notification?

Yes

II. §106.261(a)(2)

Are there new or increased emissions listed under §106.261(a)(2), including fugitives, less than or equal to 6.0 pounds per hour (lb/hr) and ten tons per year?

Yes

Please select chemical and enter emission rates:

[illegible]

III. §106.261(a)(3)

Are there new or increased emissions, including fugitives, less than or equal to 1.0 lb/hr of any chemical having a limit value (L) greater than 200 milligrams per cubic meter (mg/m³) as listed and referenced in Table 262 of 30 TAC § 106.262 relating to Facilities (Emission and Distance Limitations)?

Are there new or increased emissions, including fugitives, less than or equal to 1.0 lb/hr of any chemical not listed or referenced in Table 262?

Please enter the chemical name, L value (for chemicals listed in table 262), and emission rates:

If there is no L value available for the chemical, then leave the L value blank.

[illegible]

[Click here to go to the §106.262 Checklist sheet.](#)

This sheet provides the emissions summary from chemicals authorized under §106.261 and/or §106.262.

If the company is representing a different method to demonstrate compliance, please include a note next to the applicable chemical and attach additional sheets to the application.

[illegible][illegible][illegible][illegible]

The emission point summary table provided here is optional.

Please fill out the Emission Point Summary Table for the project emissions, including all emissions and rules being registered. Additional rows can be added if needed.

[illegible]

Hours/Day	24	Days/Week	7	Weeks/Year	52	Hours/Year	8760	
-----------	----	-----------	---	------------	----	------------	------	--

Week 25	Week 26	Week 27	Week 28	Week 29	Week 30	Week 31	Week 32

APPENDIX B: EMISSION CALCULATIONS

The following attachments are included in this appendix:

- Table B-1 Emissions Summary; and
- Table B-2 Detailed Fugitive Emission Calculations.

Table B-1
Emission Summary and PBR Emission Limit Demonstration

Permit By Rule §106.261 Annual Registration for Energy Transfer Nederland LPG Terminal

Table B-1a: Emission Summary Table

EPN	Description	Project	Pollutant	VOC?	Proposed Emissions	Proposed Emissions	Ref. Table
					(lb/hr)	(tpy)	
1-FUG	Fugitive Emissions	Project 1	Propane	Yes	0.16	0.70	B-2
			Total VOC	--	0.16	0.70	

Table B-1b: PBR Emission Limit Demonstration

Pollutant	PBR	Project	Proposed Emissions	Allowed Under PBR ⁽¹⁾	Proposed Emissions	Allowed Under PBR ⁽¹⁾	Meets PBR?
			(lb/hr)	(lb/hr)	(tpy)	(tpy)	
Propane	106.261	Project 1	0.16	6.00	0.70	10.00	Yes
Total VOC	106.4		0.16	--	0.70	25.00	Yes

Notes:

1) Emissions allowed under PBR are based on the following:

106.261(a)(2): Hourly emissions = 6 lb/hr; Annual emissions = 10 tpy.

106.4: 25 tpy for Volatile Organic Compounds (VOC) under 106.4(a)(1).

Table B-2
Detailed Fugitive Emission Calculations
Permit By Rule §106.261 Annual Registration for Energy Transfer Nederland LPG Terminal

FIN/EPN	1-FUG
Unit	LPG Unit
Material	Propane

Component Type	Service	Monitoring Program	Project 1			Project 1	
			Component Counts	Emission Factor ^(a) (lb/hr-component)	VOC Control Efficiency (%)	VOC Emissions (lb/hr)	VOC Emissions (tpy)
Valve	Gas/Vapor	28VHP	5	0.0089	97%	<0.01	0.01
Valve	LL	28VHP	92	0.0035	97%	0.0097	0.04
Flanges/connectors ²	Gas/Vapor	28VHP	15	0.0029	30%	0.03	0.13
Flanges/connectors ²	LL	28VHP	276	0.0005	30%	0.10	0.42
Open-ended Lines	All	28VHP	18	0.004	100%	-0-	-0-
Relief Valves	All	28VHP	3	0.2293	97%	0.02	0.09
Total						0.16	0.70

Sample Calculations: (Fugitive Emissions (Gas/Vapor Valves for SOCMI w/out Ethylene) used as an example)

Proposed Maximum Short Term Emission Rate

$$ER_h = \# \text{ of Components} * EF * (1 - \text{Control Efficiency (\%)}) / 100$$

$$ER_h = 92 \text{ components} * 0.0035 \text{ lb/hr-component} * (1 - 97 / 100) = 0.010 \text{ lb/hr}$$

Proposed Average Annual Emission Rate

$$ER_a = ER_h * 8,760 \text{ hr} / 2,000 \text{ lb}$$

$$ER_a = <0.01 \text{ lb/hr} * 8,760 \text{ hr} / 2,000 \text{ lb} = 0.04 \text{ tpy}$$

Notes:

1. Emission factors from Air Permit Technical Guidance Package for Chemical Sources - APDG 6422 (6/2018). SOCMI w/out Ethylene factors used.
2. Energy Transfer Nederland LPG Terminal takes advantage of the weekly audible, visual and olfactory (AVO) inspections for flanges/connectors. This allows for a 30% control of flanges and connectors.

The representations used in the emissions calculations are for purposes of calculating a potential to emit emission rate and are not intended to be considered limitations. Federal enforceability is established with compliance of overall emission rates.

Fugitive Emission Factors and Monitoring Credits

Component	Stream Type	Uncontrolled Emission Factor	Monitoring Program Emission Reduction Credits
	Stream Type	SOCMI w/o Ethylene	28VHP
Valve	Gas/Vapor	0.0089	0.97
Valve(DTM)	Gas/Vapor	0.0089	0.75
Valve	LL	0.0035	0.97
Valve(DTM)	LL	0.0035	0.75
Valve	HL	0.0007	0.3
Valve(DTM)	HL	0.0007	0.3
Flanges/Connectors	Gas/Vapor	0.0029	0.3
Flanges/Connectors2	LL	0.0005	0.3
Flanges/Connectors	HL	0.00007	0.3
Pumps/Agitators	LL	0.0386	0.85
PUmps	HL	0.0161	0.3
Compressors	Gas/Vapor	0.5027	0.85
Process Drains	ALL	0.07	0
Other	Gas/Vapor	N/A	--
Other	LL	N/A	--
Other	HL	N/A	--
Relief Valves	ALL	0.2293	0.97
Sampling Connections	ALL	0.033	0