### Statement of Basis of the Federal Operating Permit

OQ Chemicals Bishop, LLC

Site Name: Bishop Plant Physical Location: 5738 County Road 4 Nearest City: Bishop County: Nueces

> Permit Number: O2009 Project Type: Renewal

The North American Industry Classification System (NAICS) Code: 325199
NAICS Name: All Other Basic Organic Chemical Manufacturing

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

A description of the facility/area process description;

A basis for applying permit shields;

A list of the federal regulatory applicability determinations;

A table listing the determination of applicable requirements;

A list of the New Source Review Requirements;

The rationale for periodic monitoring methods selected;

The rationale for compliance assurance methods selected;

A compliance status; and

A list of available unit attribute forms.

Prepared on: April 25, 2025

## Operating Permit Basis of Determination

#### **Permit Area Process Description**

<u>POLYOL UNITS</u>: These units consist of four manufacturing processes: Trimethylolpropane (TMP), Pentaerythritol (PE), 1,3-Butylene Glycol (1,3-BG), and Sodium Formate Recovery Unit (SFRU).

The Trimethylolpropane Unit produces TMP by reacting formaldehyde, butyraldehyde, and sodium hydroxide together. The production of TMP goes through three units: reaction area, extraction area, and finishing area. Molten liquid TMP is stored in a bulk storage tank or flaked as a solid for shipment to customers.

In the Pentaerythritol Unit, formaldehyde, acetaldehyde, and sodium hydroxide are mixed together to cause a reaction to produce several grades of PE and Sodium Formate. The product solution is forwarded to a separation process. The PE solution is then crystallized, purified, and re-crystallized before the product is dried and sent to the packaging area for storage in the Polyol Warehouse.

In the BG unit, Acetaldol is formed through reaction of Acetaldehyde with Sodium Hydroxide. Acetaldol is then reacted with Pyrophoric Catalyst and high pressure Hydrogen to produce BG. BG is stored in a bulk storage tank for shipment to customers.

The Sodium Formate Recovery Unit (SFRU) is classified as a Non-Hazardous Unit. The unit processes AML, a Pentaerythritol (PE) byproduct, through an evaporation and a crystallization process whereby Sodium Formate is crystallized, centrifuged, dried, and conveyed for storage and transportation. Centrate, a waste product of the SFRU process, is blended with other sodium salt waste streams from the plant and sold as Pentaform Plus or Centrate.

#### **FOPs at Site**

The "application area" consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: None

#### **Major Source Pollutants**

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

Major Pollutants	HAPS

#### **Reading State of Texas's Federal Operating Permit**

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

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

- General Terms and Conditions
- Special Terms and Conditions
  - o Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting

- Additional Monitoring Requirements
- o New Source Review Authorization Requirements
- o Compliance Requirements
- o Protection of Stratosphere Ozone
- o Permit Location
- o Permit Shield (30 TAC § 122.148)
- Attachments
  - Applicable Requirements Summary
    - \* Unit Summary
    - \* Applicable Requirements Summary
  - o Additional Monitoring Requirements
  - o Permit Shield
  - o New Source Review Authorization References
  - o Compliance Plan
  - o Alternative Requirements
- Appendix A
  - o Acronym list

#### General Terms and Conditions

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

#### **Special Terms and Conditions**

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

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

#### Attachments

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

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

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify

monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

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

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

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

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

#### Appendix A

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

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

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

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

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

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

The applicant opted to comply with the more stringent 20% opacity standard under 30 TAC § 111.111(a)(1)(B) for all stationary vents that are subject to the 30% opacity standard under 30 TAC § 111.111(a)(1)(A).

#### **Federal Regulatory Applicability Determinations**

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

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	No
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	No
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	Yes
CSAPR (Cross-State Air Pollution Rule)	No
Federal Implementation Plan for Regional Haze (Texas SO <sub>2</sub> Trading Program)	No

#### **Basis for Applying Permit Shields**

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

#### **Insignificant Activities and Emission Units**

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

#### De Minimis Sources

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

#### Miscellaneous Sources

- 2. Office activities such as photocopying, blueprint copying, and photographic processes.
- 3. Outdoor barbecue pits, campfires, and fireplaces.
- 4. Storage and handling of sealed portable containers, cylinders, or sealed drums.
- 5. Vehicle exhaust from maintenance or repair shops.
- 6. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
- 7. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
- 8. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
- 9. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
- 10. Well cellars.
- 11. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
- 12. Equipment used exclusively for the melting or application of wax.
- 13. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
- 14. Battery recharging areas.

#### Sources Authorized by 30 TAC Chapter 106, Permits by Rule

- 15. Sources authorized by §106.102: Combustion units designed and used exclusively for comfort heating purposes employing liquid petroleum gas, natural gas, solid wood, or distillate fuel oil.
- 16. Sources authorized by §106.122: Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
- 17. Sources authorized by §106.141: Batch mixers with rated capacity of 27 cubic feet or less for mixing cement, sand, aggregate, lime, gypsum, additives, and/or water to produce concrete, grout, stucco, mortar, or other similar products.
- 18. Sources authorized by §106.143: Wet sand and gravel production facilities that obtain material from subterranean and subaqueous beds where the deposits of sand and gravel are consolidated granular materials resulting from natural disintegration of rock and stone and have a production rate of 500 tons per hour or less.
- 19. Sources authorized by §106.148: Railcar or truck unloading of wet sand, gravel, aggregate, coal, lignite, and scrap iron or scrap steel (but not including metal ores, metal oxides, battery parts, or fine dry materials) into trucks or other railcars for transportation to other locations.
- 20. Sources authorized by §106.149: Sand and gravel production facilities that obtain material from deposits of sand and gravel consisting of natural disintegration of rock and stone, provided that crushing or breaking operations are not used and no blasting is conducted to obtain the material.
- 21. Sources authorized by §106.161: Animal feeding operations which confine animals in numbers specified and any associated on-site feed handling and/or feed millings operations, not including caged laying and caged pullet operations.
- 22. Sources authorized by §106.162: Livestock auction sales facilities.
- 23. Sources authorized by §106.163: All animal racing facilities, domestic animal shelters, zoos, and their associated confinement areas, stables, feeding areas, and waste collection and treatment facilities, other than incineration units.
- 24. Sources authorized by §106.229: Equipment used exclusively for the dyeing or stripping of textiles.
- 25. Sources authorized by §106.241: Any facility where animals or poultry are slaughtered and prepared for human consumption provided that waste products such as blood, offal, and feathers are stored in such a manner as to prevent the creation of a nuisance condition and these waste products are removed from the premises daily or stored under refrigeration.
- 26. Sources authorized by §106.242: Equipment used in eating establishments for the purpose of preparing food for human consumption.
- 27. Sources authorized by §106.243: Smokehouses in which the maximum horizontal inside cross-sectional area does not exceed 100 square feet.
- 28. Sources authorized by §106.244: Ovens, mixers, blenders, barbecue pits, and cookers if the products are edible and intended for human consumption.

- 29. Sources authorized by §106.266: Vacuum cleaning systems used exclusively for industrial, commercial, or residential housekeeping purposes.
- 30. Sources authorized by §106.301: Aqueous fertilizer storage tanks.
- 31. Sources authorized by §106.313: All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
- 32. Sources authorized by §106.316: Equipment used for inspection of metal products.
- 33. Sources authorized by §106.317: Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
- 34. Sources authorized by §106.318: Die casting machines.
- 35. Sources authorized by §106.319: Foundry sand mold forming equipment to which no heat is applied.
- 36. Sources authorized by §106.331: Equipment used exclusively to package pharmaceuticals and cosmetics or to coat pharmaceutical tablets.
- 37. Sources authorized by §106.333: Equipment used exclusively for the mixing and blending of materials at ambient temperature to make water-based adhesives.
- 38. Sources authorized by §106.372: Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
- 39. Sources authorized by §106.391: Presses used for the curing of rubber products and plastic products.
- 40. Sources authorized by §106.394: Equipment used for compression molding and injection molding of plastics.
- 41. Sources authorized by §106.414: Equipment used exclusively for the packaging of lubricants or greases.
- 42. Sources authorized by §106.415: Laundry dryers, extractors, and tumblers used for fabrics cleaned with water solutions of bleach or detergents.
- 43. Sources authorized by §106.431: Equipment used exclusively to mill or grind coatings and molding compounds where all materials charged are in paste form.
- 44. Sources authorized by §106.432: Containers, reservoirs, or tanks used exclusively for dipping operations for coating objects with oils, waxes, or greases where no organic solvents, diluents, or thinners are used; or dipping operations for applying coatings of natural or synthetic resins which contain no organic solvents.
- 45. Sources authorized by §106.451: Blast cleaning equipment using a suspension of abrasives in water.
- 46. Sources authorized by §106.453: Equipment used for washing or drying products fabricated from metal or glass, provided no volatile organic materials are used in the process and no oil or solid fuel is burned.
- 47. Sources authorized by §106.471: Equipment used exclusively to store or hold dry natural gas.
- 48. Sources authorized by §106.531: Sewage treatment facilities, excluding combustion or incineration equipment, land farms, or grease trap waste handling or treatment facilities.

#### **Determination of Applicable Requirements**

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

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

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

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

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

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

#### Operational Flexibility

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

#### **Determination of Applicable Requirements**

Unit ID	Regulation	Index Number	Basis of Determination*
126V2474	30 TAC Chapter 115, Storage of VOCs	115B-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
			Product Stored = VOC other than crude oil or condensate
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
			Tank Description = Tank using an internal floating roof (IFR)
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia
126V3075	30 TAC Chapter 115, Storage of VOCs	115B-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
			Product Stored = VOC other than crude oil or condensate
			Storage Capacity = Capacity is greater than 40,000 gallons
			Tank Description = Tank does not require emission controls
			True Vapor Pressure = True vapor pressure is less than 1.0 psia
126V3075	40 CFR Part 63, Subpart	63G-1	MACT Subpart F/G Applicability = The unit is a Group 2 vessel.
	G		NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.
			NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.
126V3076	30 TAC Chapter 115, Storage of VOCs	115B-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
			Product Stored = VOC other than crude oil or condensate
			Storage Capacity = Capacity is greater than 25,000 gallons but less than or equal to 40,000 gallons
			Tank Description = Tank does not require emission controls
			True Vapor Pressure = True vapor pressure is less than 1.0 psia
126V883	30 TAC Chapter 115, Storage of VOCs	115B-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
			Product Stored = VOC other than crude oil or condensate
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
			Tank Description = Tank using a vapor recovery system (VRS)
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia
			Control Device Type = Direct-flame incinerator
126V883	30 TAC Chapter 115, Storage of VOCs	115B-2	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
			Product Stored = VOC other than crude oil or condensate
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
			Tank Description = Tank using a vapor recovery system (VRS)

			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia
			Control Device Type = Flare
126V883	30 TAC Chapter 115, Storage of VOCs	115B-3	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
			Product Stored = VOC other than crude oil or condensate
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
			Tank Description = Tank using a vapor recovery system (VRS)
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia
			Control Device Type = Other control device
126V883	40 CFR Part 63, Subpart	63G-1	MACT Subpart F/G Applicability = The unit is a Group 2 vessel.
	G		NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.
			NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.
126V892	30 TAC Chapter 115, Storage of VOCs	115B-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
			Product Stored = VOC other than crude oil or condensate
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
			Tank Description = Tank does not require emission controls
			True Vapor Pressure = True vapor pressure is less than 1.0 psia
126V892	40 CFR Part 63, Subpart	63G-1	MACT Subpart F/G Applicability = The unit is a Group 2 vessel.
	G		NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.
			NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.
126V90127	30 TAC Chapter 115, Storage of VOCs	115B-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
			Product Stored = VOC other than crude oil or condensate
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
			Tank Description = Tank does not require emission controls
			True Vapor Pressure = True vapor pressure is less than 1.0 psia
126V90127	40 CFR Part 63, Subpart	63G-1	MACT Subpart F/G Applicability = The unit is a Group 2 vessel.
	G		NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.
			NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.
129V1274	30 TAC Chapter 115, Storage of VOCs	115B-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
			Product Stored = VOC other than crude oil or condensate
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
			Tank Description = Tank using an internal floating roof (IFR)

			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia
129V2612	30 TAC Chapter 115, Storage of VOCs	115B-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
			Product Stored = VOC other than crude oil or condensate
			Storage Capacity = Capacity is less than or equal to 1,000 gallons
129V2977	30 TAC Chapter 115, Storage of VOCs	115B-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
			Product Stored = VOC other than crude oil or condensate
			Storage Capacity = Capacity is greater than 40,000 gallons
			Tank Description = Tank using a vapor recovery system (VRS)
			True Vapor Pressure = True vapor pressure is less than 1.0 psia
129V2977	40 CFR Part 63, Subpart	63G-1	MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).
			NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.
			Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is greater than or equal to 11.11 psi (76.6 kPa)
			Emission Control Type = Closed vent system (CVS) and control device (fixed roof)
			Closed Vent System = Closed vent system is routing emissions to a process or fuel gas system, or is subject to § 63.148 of Subpart G.
			Hard Piping = The closed vent system is constructed of hard piping.
			Bypass Lines = Closed vent system has no by-pass lines.
			Control Device Type = Control device other than a flare, thermal incinerator, boiler, process heater, enclosed combustion device meeting residence time and temperature requirements, carbon adsorber, condenser or hazardous waste incinerator.
			Control Device Design = The control device was not installed on or before December 31, 1992 or was not designed to reduce inlet emissions of total organic hazardous air pollutants by greater than or equal to 90% and less than 95%.
			Design Evaluation Submitted = Results of a performance test was submitted to demonstrate compliance with 40 CFR § 63.119(e).
129V747	30 TAC Chapter 115, Storage of VOCs	115B-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
			Product Stored = VOC other than crude oil or condensate
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
			Tank Description = Tank does not require emission controls
			True Vapor Pressure = True vapor pressure is less than 1.0 psia
129V747	40 CFR Part 60, Subpart	60Kb-1	Product Stored = Volatile organic liquid
	Kb		Storage Capacity = Capacity is greater than or equal to 10,600 gallons but less than 19,813 gallons (capacity is greater than 40,000 liters but less than or equal to 75,000 liters)
129V755	30 TAC Chapter 115,	115B-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
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	Storage of VOCs		Product Stored = VOC other than crude oil or condensate
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
			Tank Description = Tank using a submerged fill pipe
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia
129V762	30 TAC Chapter 115, Storage of VOCs	115B-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
			Product Stored = VOC other than crude oil or condensate
			Storage Capacity = Capacity is less than or equal to 1,000 gallons
			Tank Description = Tank does not require emission controls
			True Vapor Pressure = True vapor pressure is less than 1.0 psia
130V-304	30 TAC Chapter 115, Storage of VOCs	115B-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
			Product Stored = VOC other than crude oil or condensate
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
			Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized
			Tank Description = Tank using a submerged fill pipe
			True Vapor Pressure = True vapor pressure is less than 1.0 psia
130V-304	40 CFR Part 60, Subpart Kb	ubpart 60Kb-1	Product Stored = Volatile organic liquid
			Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)
			Maximum True Vapor Pressure = True vapor pressure is less than 2.2 psia
GRP-TANKS1	30 TAC Chapter 115, Storage of VOCs	115B-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
			Product Stored = VOC other than crude oil or condensate
			Storage Capacity = Capacity is greater than 40,000 gallons
			Tank Description = Tank using a vapor recovery system (VRS)
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia
			Control Device Type = Direct-flame incinerator
GRP-TANKS1	30 TAC Chapter 115, Storage of VOCs	115B-2	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
			Product Stored = VOC other than crude oil or condensate
			Storage Capacity = Capacity is greater than 40,000 gallons
			Tank Description = Tank using a vapor recovery system (VRS)
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia
			Control Device Type = Flare
GRP-TANKS1	30 TAC Chapter 115, Storage of VOCs	115B-3	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.

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			Product Stored = VOC other than crude oil or condensate
			Storage Capacity = Capacity is greater than 40,000 gallons
			Tank Description = Tank using a vapor recovery system (VRS)
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia
			Control Device Type = Other control device
GRP-TANKS2	30 TAC Chapter 115, Storage of VOCs	115B-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
			Product Stored = VOC other than crude oil or condensate
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
			Tank Description = Tank using a vapor recovery system (VRS)
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia
			Control Device Type = Direct-flame incinerator
GRP-TANKS2	30 TAC Chapter 115, Storage of VOCs	115B-2	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
			Product Stored = VOC other than crude oil or condensate
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
			Tank Description = Tank using a vapor recovery system (VRS)
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia
			Control Device Type = Flare
GRP-TANKS2	30 TAC Chapter 115, Storage of VOCs	115B-3	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
			Product Stored = VOC other than crude oil or condensate
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
			Tank Description = Tank using a vapor recovery system (VRS)
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia
			Control Device Type = Other control device
GRP-TANKS2	40 CFR Part 63, Subpart	63G-1	MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).
			NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.
			Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is greater than or equal to 11.11 psi (76.6 kPa)
			Emission Control Type = Closed vent system (CVS) and control device (fixed roof)
			Closed Vent System = Closed vent system is routing emissions to a process or fuel gas system, or is subject to § 63.148 of Subpart G.
			Hard Piping = The closed vent system is constructed of hard piping.
			Bypass Lines = Closed vent system has no by-pass lines.
			Control Device Type = Boiler or process heater with a design heat input capacity greater than or equal to 44 MW
			Control Device Design = The control device was not installed on or before December 31, 1992 or was not designed to

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			reduce inlet emissions of total organic hazardous air pollutants by greater than or equal to 90% and less than 95%.
GRP-TANKS3	30 TAC Chapter 115, Storage of VOCs	115B-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.  Product Stored = VOC other than crude oil or condensate  Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons  Tank Description = Tank using a vapor recovery system (VRS)  True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia  Control Device Type = Direct-flame incinerator
GRP-TANKS3	30 TAC Chapter 115, Storage of VOCs	115B-2	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.  Product Stored = VOC other than crude oil or condensate  Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons  Tank Description = Tank using a vapor recovery system (VRS)  True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia  Control Device Type = Flare
GRP-TANKS3	30 TAC Chapter 115, Storage of VOCs	115B-3	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.  Product Stored = VOC other than crude oil or condensate  Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons  Tank Description = Tank using a vapor recovery system (VRS)  True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia  Control Device Type = Other control device
GRP-TANKS4	30 TAC Chapter 115, Storage of VOCs	115B-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.  Product Stored = VOC other than crude oil or condensate  Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons  Tank Description = Tank does not require emission controls  True Vapor Pressure = True vapor pressure is less than 1.0 psia
GRP-TANKS4	40 CFR Part 60, Subpart Kb	60Kb-1	Product Stored = Volatile organic liquid  Storage Capacity = Capacity is greater than or equal to 10,600 gallons but less than 19,813 gallons (capacity is greater than 40,000 liters but less than or equal to 75,000 liters)
GRP-TANKS7	30 TAC Chapter 115, Storage of VOCs	115B-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.  Product Stored = VOC other than crude oil or condensate  Storage Capacity = Capacity is greater than 40,000 gallons  Tank Description = Tank does not require emission controls

			True Vapor Pressure = True vapor pressure is less than 1.0 psia
GRP-TANKS8	30 TAC Chapter 115, Storage of VOCs	115B-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.  Product Stored = VOC other than crude oil or condensate  Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons  Tank Description = Tank does not require emission controls  True Vapor Pressure = True vapor pressure is less than 1.0 psia
GRP-TANKS8	40 CFR Part 63, Subpart G	63G-1	MACT Subpart F/G Applicability = The unit is a Group 2 vessel.  NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.  NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.
129UNLOAD	30 TAC Chapter 115, Loading and Unloading of VOC	115C-1	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.  Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.  Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.  Transfer Type = Only unloading.  True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia.  Vapor Tight = All liquid and vapor lines are equipped with fittings which make vapor-tight connections that close automatically when disconnected.
129UNLOAD	30 TAC Chapter 115, Loading and Unloading of VOC	115C-2	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.  Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.  Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.  Transfer Type = Only unloading.  True Vapor Pressure = True vapor pressure is less than 1.5 psia.
130ACHRAIL	30 TAC Chapter 115, Loading and Unloading of VOC	115C-1	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.  Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.  Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.  Transfer Type = Only unloading.  True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia.  Vapor Tight = All liquid and vapor lines are equipped with fittings which make vapor-tight connections that close automatically when disconnected.
GRP-LOAD	30 TAC Chapter 115, Loading and Unloading of VOC	115/147499	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.  Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.

			Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.  Transfer Type = Only loading.
			True Vapor Pressure = True vapor pressure is less than 1.5 psia.
126FILTER	40 CFR Part 60, Subpart VVa	60VVa126FILTER	Produces Chemicals = The facility produces, as an intermediate or final product, one or more of the chemicals listed in 40 CFR § 60.489a.
			Affected Facility = The facility is an affected facility as defined in 40 CFR § 60.480a(a)(2).
			Construction/Modification Date = After November 7, 2006.
			Compliance Option = Choosing to comply with the provisions of 40 CFR Part 63, Subpart H.
126FUG	40 CFR Part 60, Subpart	60VV-1	Produces Chemicals = The fugitive unit is part of a facility that produces as an intermediate or final product one or more of the chemicals listed in 40 CFR § 60.489.
			Affected Facility = The fugitive unit is part of a facility that is an affected facility as defined in 40 CFR § 60.480(a)(2).
			Construction/Modification Date = On or before January 5, 1981.
			Vacuum Service = The fugitive unit does not contain equipment in vacuum service.
			Pumps in Light Liquid Service = The fugitive unit contains pumps in light liquid service.
			Equivalent Emission Limitation = No equivalent emission limitation is used for pumps in light liquid service.
			Complying with 40 CFR § 60.482-2 = Pumps in light liquid service are complying with § 60.482-2.
			Compressors = The fugitive unit does not contain compressors.
			Pressure Relief Devices in Gas/Vapor Service = The fugitive unit does not contain pressure relief devices in gas/vapor service.
			Sampling Connection Systems = The fugitive unit does not contain sampling connection systems.
			Valves in Gas/Vapor or Light Liquid Service = The fugitive unit does not contain valves in gas/vapor or light liquid service.
			Equivalent Emission Limitation = No equivalent emission limitation is used for valves in gas/vapor or light liquid service.
			Complying with 40 CFR § 60.482-7 = Valves in gas/vapor or light liquid service are complying with § 60.482-7.
			Pumps in Heavy Liquid Service = The fugitive unit does not contain pumps in heavy liquid service.
			Equivalent Emission Limitation = No equivalent emission limitation is used for pumps in heavy liquid service.
			Valves in Heavy Liquid Service = The fugitive unit does not contain valves in heavy liquid service.
			Flanges and Other Connectors = The fugitive unit does not contain flanges and other connectors.
			Equivalent Emission Limitation = No equivalent emission limitation is used for flanges and other connectors.
			Complying with 40 CFR § 60.482-8 = No flanges and other connectors are complying with § 60.482-8.
			Vapor Recovery System = The fugitive unit does not contain vapor recovery systems.
			Equivalent Emission Limitation = No equivalent emission limitation is used for vapor recovery systems.
			Complying with 40 CFR § 60.482-10 = No vapor recovery systems are complying with § 60.482-10.
			Enclosed Combustion Device = The fugitive unit does not contain enclosed combustion devices.
			Equivalent Emission Limitation = No equivalent emission limitation is used for enclosed combustion devices.
			Complying with 40 CFR § 60.482-10 = No enclosed combustion devices are complying with § 60.482-10.
			Flare = The fugitive unit does not contain flares.
			Equivalent Emission Limitation = No equivalent emission limitation is used for flares.

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			Complying with 40 CFR § 60.482-10 = No flares are complying with § 60.482-10.  Closed Vent (or Vapor Collection) Systems = The fugitive unit does not contain closed vent or vapor collection systems.  Equivalent Emission Limitation = No equivalent emission limitation is used for closed vent or vapor collection systems.  Complying with 40 CFR § 60.482-10 = No closed vent or vapor collection systems are complying with § 60.482-10.
126FUG	40 CFR Part 60, Subpart VVa	60VVa-1	Produces Chemicals = The facility produces, as an intermediate or final product, one or more of the chemicals listed in 40 CFR § 60.489a.  Affected Facility = The facility is an affected facility as defined in 40 CFR § 60.480a(a)(2).  Construction/Modification Date = After November 7, 2006.  Compliance Option = Choosing to comply with the provisions of 40 CFR Part 63, Subpart H.
126FUG	40 CFR Part 61, Subpart V	61V-1	Vacuum Service = The fugitive unit does not contain components in vacuum service.  VHAP Service = The fugitive unit does not contain pumps in VHAP service.  Pumps = The fugitive unit does not contain pumps in VHAP service.  AMEL = No alternate method of emission limitation is used for pumps.  Compressors = The fugitive unit does not contain compressors in VHAP service.  AMEL = No alternate method of emission limitation is used for compressors.  Pressure Relief Devices in Gas/Vapor Service = The fugitive unit does not contain pressure relief devices in gas/vapor VHAP service.  AMEL = No alternate method of emission limitation is used for pressure relief devices in gas/vapor service.  Pressure Relief Devices in Liquid Service = The fugitive unit does not contain pressure relief devices in liquid VHAP service.  AMEL = No alternate method of emission limitation is used for pressure relief devices in liquid service.  Sampling Connection Systems = The fugitive unit does not contain sampling connection systems in VHAP service.  AMEL = No alternate method of emission limitation is used for sampling connection systems in VHAP service.  AMEL = No alternate method of emission limitation is used for open-ended valves or lines in VHAP service.  AMEL = No alternate method of emission limitation is used for open-ended valves or lines in VHAP service.  AMEL = No alternate method of emission limitation is used for valves.  Flanges and Other Connectors = The fugitive unit does not contain flanges and other connectors in VHAP service.  AMEL = No alternate method of emission limitation is used for flanges and other connectors.  Product Accumulator Vessels = The fugitive unit does not contain product accumulator vessels.  AMEL = No alternate method of emission limitation is used for product accumulator vessels.  Vapor Recovery System = The fugitive unit does not contain vapor recovery systems in VHAP service.  AMEL = No alternate method of emission limitation is used for vapor recovery systems in VHAP service.  AMEL = No alternate
			AMEL = No alternate method of emission limitation is used for vapor recovery systems.  Enclosed Combustion Device = The fugitive unit does not contain enclosed combustion devices in VHAP service.  AMEL = No alternate method of emission limitation is used for enclosed combustion devices.  Flare = The fugitive unit does not contain flares.

			control devices.
126FUG	40 CFR Part 63, Subpart	63H-1	EQUIPMENT TYPE = FUGITIVE UNIT CONTAINS EQUIPMENT LISTED IN 40 CFR § 63.160(A) WHICH IS OPERATED IN ORGANIC HAZARDOUS AIR POLLUTANT SERVICE
			NON RESEARCH AND DEVELOPMENT/BATCH PROCESSES = FUGITIVE UNIT CONTAINS PROCESSES OTHER THAN RESEARCH AND DEVELOPMENT FACILITIES AND BENCH-SCALE BATCH PROCESSES
			VACUUM SERVICE = NOT ALL OF THE EQUIPMENT IN THE FUGITIVE UNIT IS IN VACUUM SERVICE
			LESS THAN 300 OPERATING HOURS = THE FUGITIVE UNIT DOES NOT CONTAIN ANY EQUIPMENT IN ORGANIC HAZARDOUS AIR POLLUTANT (HAP) SERVICE THAT IS INTENDED TO OPERATE LESS THAN 300 HOURS PER CALENDAR YEAR
			AMEL = FUGITIVE UNIT SOURCE OWNER/OPERATOR IS NOT ELECTING TO COMPLY WITH AN ALTERNATIVE MEANS OF EMISSION LIMITATION (AMEL)
			LIGHT LIQUID SERVICE (PUMPS) = COMPONENT PRESENT
			HEAVY LIQUID SERVICE (PUMPS) = COMPONENT NOT PRESENT
			QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR PUMPS
			ANY (COMPRESSORS) = COMPONENT NOT PRESENT
			GAS VAPOR SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT
			LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT
			HEAVY LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT
			ANY (SAMPLING CONNECTION SYSTEMS) = COMPONENT NOT PRESENT
			HEAVY LIQUID SERVICE (SAMPLING CONNECTION SYSTEMS) = COMPONENT NOT PRESENT
			ANY (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT
			HEAVY LIQUID SERVICE (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT
			GAS/VAPOR OR LIGHT LIQUID SERVICE (VALVES) = COMPONENT PRESENT
			HEAVY LIQUID SERVICE (VALVES) = COMPONENT NOT PRESENT
			QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR VALVES
			GAS/VAPOR OR LIGHT LIQUID SERVICE (CONNECTORS) = COMPONENT PRESENT
			HEAVY LIQUID SERVICE (CONNECTORS) = COMPONENT NOT PRESENT
			GAS/VAPOR OR LIGHT LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT
			HEAVY LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT
			ANY (INSTRUMENTATION SYSTEMS) = COMPONENT NOT PRESENT
			HEAVY LIQUID SERVICE (INSTRUMENTATION SYSTEMS = COMPONENT NOT PRESENT
			ANY (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT
			HEAVY LIQUID SERVICE (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT
			ANY (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT
			BYPASS LINES = FUGITIVE UNIT WITH A CLOSED-VENT SYSTEM DOES NOT CONTAIN A BY-PASS LINE THAT COULD DIVERT A VENT STREAM AWAY FROM THE CONTROL DEVICE AND TO THE ATMOSPHERE
			UNSAFE TO INSPECT = FUGITIVE UNIT CONTAINS ANY CLOSED-VENT SYSTEM WITH PARTS DESIGNATED AS UNSAFE TO INSPECT
			DIFFICULT TO INSPECT = FUGITIVE UNIT CONTAINS ANY CLOSED-VENT SYSTEM WITH PARTS DESIGNATED AS DIFFICULT TO INSPECT

			EMPLOYEE NUMBER = THE CORPORATION EMPLOYS 100 OR MORE PERSONS
130FUG	40 CFR Part 60, Subpart VV	60VV-1	Produces Chemicals = The fugitive unit is not part of a facility that produces as an intermediate or final product one or more of the chemicals listed in 40 CFR § 60.489.
			Affected Facility = The fugitive unit is not part of a facility that is an affected facility as defined in 40 CFR § 60.480(a)(2).
			Construction/Modification Date = On or before January 5, 1981.
130FUG	40 CFR Part 61, Subpart	61V-1	Vacuum Service = The fugitive unit does not contain components in vacuum service.
	V		VHAP Service = The fugitive unit contains no components in VHAP service.
			Pumps = The fugitive unit does not contain pumps in VHAP service.
			AMEL = No alternate method of emission limitation is used for pumps.
			Compressors = The fugitive unit does not contain compressors in VHAP service.
			AMEL = No alternate method of emission limitation is used for compressors.
			Pressure Relief Devices in Gas/Vapor Service = The fugitive unit does not contain pressure relief devices in gas/vapor VHAP service.
			AMEL = No alternate method of emission limitation is used for pressure relief devices in gas/vapor service.
			Pressure Relief Devices in Liquid Service = The fugitive unit does not contain pressure relief devices in liquid VHAP service.
			AMEL = No alternate method of emission limitation is used for pressure relief devices in liquid service.
			Sampling Connection Systems = The fugitive unit does not contain sampling connection systems in VHAP service.
			AMEL = No alternate method of emission limitation is used for sampling connection systems.
			Open-ended Valves or Lines = The fugitive unit does not contain open-ended valves or lines in VHAP service.
			AMEL = No alternate method of emission limitation is used for open-ended valves or lines.
			Valves = The fugitive unit does not contain valves in VHAP service.
			AMEL = No alternate method of emission limitation is used for valves.
			Flanges and Other Connectors = The fugitive unit does not contain flanges and other connectors in VHAP service.
			AMEL = No alternate method of emission limitation is used for flanges and other connectors.
			Product Accumulator Vessels = The fugitive unit does not contain product accumulator vessels.
			AMEL = No alternate method of emission limitation is used for product accumulator vessels.
			Vapor Recovery System = The fugitive unit does not contain vapor recovery systems in VHAP service.
			AMEL = No alternate method of emission limitation is used for vapor recovery systems.
			Enclosed Combustion Device = The fugitive unit does not contain enclosed combustion devices in VHAP service.
			AMEL = No alternate method of emission limitation is used for enclosed combustion devices.
			Flare = The fugitive unit does not contain flares.
			AMEL = No alternate method of emission limitation is used for flares.
			AMEL (Closed-Vent Systems) = No alternate method of emission limitation is used for closed vent systems or other control devices.
130FUG	40 CFR Part 63, Subpart	63H-1	EQUIPMENT TYPE = FUGITIVE UNIT DOES NOT CONTAIN EQUIPMENT LISTED IN 40 CFR § 63.160(A) WHICH IS OPERATED IN ORGANIC HAZARDOUS AIR POLLUTANT SERVICE
			NON RESEARCH AND DEVELOPMENT/BATCH PROCESSES = FUGITIVE UNIT CONTAINS ONLY PROCESSES

FOR RESEARCH AND DEVELOPMENT FACILITIES AND BENCH-SCALE BATCH PROCESSES VACUUM SERVICE = NOT ALL OF THE EQUIPMENT IN THE FUGITIVE UNIT IS IN VACUUM SERVICE LESS THAN 300 OPERATING HOURS = THE FUGITIVE UNIT DOES NOT CONTAIN ANY EQUIPMENT IN ORGANIC HAZARDOUS AIR POLLUTANT (HAP) SERVICE THAT IS INTENDED TO OPERATE LESS THAN 300 HOURS PER CALENDAR YEAR AMEL = FUGITIVE UNIT SOURCE OWNER/OPERATOR IS NOT ELECTING TO COMPLY WITH AN ALTERNATIVE MEANS OF EMISSION LIMITATION (AMEL) ENCLOSED-VENTED PROCESS UNIT AMEL = UNIT DOES NOT CONTAIN A TOTALLY ENCLOSED VENTED PROCESS UNIT COMPLYING WITH AN ALTERNATE MEANS OF EMISSION LIMITATION IN § 63.179 HEAVY LIQUID SERVICE = ENCLOSED VENTED PROCESS UNIT DOES NOT CONTAIN EQUIPEMENT IN HEAVY LIOUID SERVICE BATCH PROCESS AMEL = UNIT DOES NOT CONTAIN A BATCH PROCESS UNIT COMPLYING WITH AN ALTERNATE MEANS OF EMISSION LIMITATION IN § 63.178 GENERAL AMEL = UNIT IS NOT COMPLYING WITH AN ALTERNATE MEANS OF EMISSION LIMITATION UNDER § 63.177 LIGHT LIQUID SERVICE (PUMPS) = COMPONENT NOT PRESENT HEAVY LIQUID SERVICE (PUMPS) = COMPONENT NOT PRESENT QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR PUMPS ANY (COMPRESSORS) = COMPONENT NOT PRESENT GAS VAPOR SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT HEAVY LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT ANY (SAMPLING CONNECTION SYSTEMS) = COMPONENT NOT PRESENT HEAVY LIQUID SERVICE (SAMPLING CONNECTION SYSTEMS) = COMPONENT NOT PRESENT ANY (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT HEAVY LIQUID SERVICE (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT GAS/VAPOR OR LIGHT LIQUID SERVICE (VALVES) = COMPONENT NOT PRESENT HEAVY LIQUID SERVICE (VALVES) = COMPONENT NOT PRESENT QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR VALVES GAS/VAPOR OR LIGHT LIQUID SERVICE (CONNECTORS) = COMPONENT NOT PRESENT HEAVY LIQUID SERVICE (CONNECTORS) = COMPONENT NOT PRESENT GAS/VAPOR OR LIGHT LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT HEAVY LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT ANY (INSTRUMENTATION SYSTEMS) = COMPONENT NOT PRESENT HEAVY LIQUID SERVICE (INSTRUMENTATION SYSTEMS = COMPONENT NOT PRESENT ANY (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT HEAVY LIQUID SERVICE (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT **PRESENT** ANY (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT RECOVERY OR RECAPTURE DEVICES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT ENCLOSED COMBUSTION DEVICES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT

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			FLARES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT
			BYPASS LINES = FUGITIVE UNIT WITH A CLOSED-VENT SYSTEM DOES NOT CONTAIN A BY-PASS LINE THAT COULD DIVERT A VENT STREAM AWAY FROM THE CONTROL DEVICE AND TO THE ATMOSPHERE
			UNSAFE TO INSPECT = FOR A FUGITIVE UNIT THAT CONTAINS ANY CLOSED-VENT SYSTEM, THERE ARE NO PARTS DESIGNATED AS UNSAFE TO INSPECT
			DIFFICULT TO INSPECT = FOR A FUGITIVE UNIT THAT CONTAINS ANY CLOSED-VENT SYSTEM, THERE ARE NO PARTS DESIGNATED AS DIFFICULT TO INSPECT
FUG	40 CFR Part 60, Subpart VVa	60VVaFUG	Produces Chemicals = The facility produces, as an intermediate or final product, one or more of the chemicals listed in 4C CFR § 60.489a.
			Affected Facility = The facility is an affected facility as defined in 40 CFR § 60.480a(a)(2).
			Construction/Modification Date = After November 7, 2006.
			Compliance Option = Choosing to comply with the provisions of 40 CFR Part 63, Subpart H.
GRP-FUGS	40 CFR Part 60, Subpart	60VV-1	Produces Chemicals = The fugitive unit is part of a facility that produces as an intermediate or final product one or more of the chemicals listed in 40 CFR § 60.489.
			Affected Facility = The fugitive unit is part of a facility that is an affected facility as defined in 40 CFR § 60.480(a)(2).
			Construction/Modification Date = On or before January 5, 1981.
GRP-FUGS	40 CFR Part 61, Subpart	61V-1	Vacuum Service = The fugitive unit does not contain components in vacuum service.
	V		VHAP Service = The fugitive unit contains no components in VHAP service.
			Pumps = The fugitive unit does not contain pumps in VHAP service.
			AMEL = No alternate method of emission limitation is used for pumps.
			Compressors = The fugitive unit does not contain compressors in VHAP service.
			AMEL = No alternate method of emission limitation is used for compressors.
			Pressure Relief Devices in Gas/Vapor Service = The fugitive unit does not contain pressure relief devices in gas/vapor VHAP service.
			AMEL = No alternate method of emission limitation is used for pressure relief devices in gas/vapor service.
			Pressure Relief Devices in Liquid Service = The fugitive unit does not contain pressure relief devices in liquid VHAP service.
			AMEL = No alternate method of emission limitation is used for pressure relief devices in liquid service.
			Sampling Connection Systems = The fugitive unit does not contain sampling connection systems in VHAP service.
			AMEL = No alternate method of emission limitation is used for sampling connection systems.
			Open-ended Valves or Lines = The fugitive unit does not contain open-ended valves or lines in VHAP service.
			AMEL = No alternate method of emission limitation is used for open-ended valves or lines.
			Valves = The fugitive unit does not contain valves in VHAP service.
			AMEL = No alternate method of emission limitation is used for valves.
			Flanges and Other Connectors = The fugitive unit does not contain flanges and other connectors in VHAP service.
			AMEL = No alternate method of emission limitation is used for flanges and other connectors.
			Product Accumulator Vessels = The fugitive unit does not contain product accumulator vessels.
			AMEL = No alternate method of emission limitation is used for product accumulator vessels.
			Vapor Recovery System = The fugitive unit does not contain vapor recovery systems in VHAP service.

			AMEL = No alternate method of emission limitation is used for vapor recovery systems.
			Enclosed Combustion Device = The fugitive unit does not contain enclosed combustion devices in VHAP service.
			AMEL = No alternate method of emission limitation is used for enclosed combustion devices.
			Flare = The fugitive unit does not contain flares.
			AMEL = No alternate method of emission limitation is used for flares.
			AMEL (Closed-Vent Systems) = No alternate method of emission limitation is used for closed vent systems or other control devices.
GRP-FUGS	40 CFR Part 63, Subpart H	63H-1	EQUIPMENT TYPE = FUGITIVE UNIT CONTAINS EQUIPMENT LISTED IN 40 CFR § 63.160(A) WHICH IS OPERATED IN ORGANIC HAZARDOUS AIR POLLUTANT SERVICE
			NON RESEARCH AND DEVELOPMENT/BATCH PROCESSES = FUGITIVE UNIT CONTAINS PROCESSES OTHER THAN RESEARCH AND DEVELOPMENT FACILITIES AND BENCH-SCALE BATCH PROCESSES
			VACUUM SERVICE = NOT ALL OF THE EQUIPMENT IN THE FUGITIVE UNIT IS IN VACUUM SERVICE
			LESS THAN 300 OPERATING HOURS = THE FUGITIVE UNIT DOES NOT CONTAIN ANY EQUIPMENT IN ORGANIC HAZARDOUS AIR POLLUTANT (HAP) SERVICE THAT IS INTENDED TO OPERATE LESS THAN 300 HOURS PER CALENDAR YEAR
			AMEL = FUGITIVE UNIT SOURCE OWNER/OPERATOR IS NOT ELECTING TO COMPLY WITH AN ALTERNATIVE MEANS OF EMISSION LIMITATION (AMEL)
			LIGHT LIQUID SERVICE (PUMPS) = COMPONENT PRESENT
			HEAVY LIQUID SERVICE (PUMPS) = COMPONENT NOT PRESENT
			QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR PUMPS
			ANY (COMPRESSORS) = COMPONENT NOT PRESENT
			GAS VAPOR SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT
			LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT
			HEAVY LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT
			ANY (SAMPLING CONNECTION SYSTEMS) = COMPONENT NOT PRESENT
			HEAVY LIQUID SERVICE (SAMPLING CONNECTION SYSTEMS) = COMPONENT NOT PRESENT
			ANY (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT
			HEAVY LIQUID SERVICE (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT
			GAS/VAPOR OR LIGHT LIQUID SERVICE (VALVES) = COMPONENT PRESENT
			HEAVY LIQUID SERVICE (VALVES) = COMPONENT NOT PRESENT
			QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR VALVES
			GAS/VAPOR OR LIGHT LIQUID SERVICE (CONNECTORS) = COMPONENT PRESENT
			HEAVY LIQUID SERVICE (CONNECTORS) = COMPONENT NOT PRESENT
			GAS/VAPOR OR LIGHT LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT
			HEAVY LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT
			ANY (INSTRUMENTATION SYSTEMS) = COMPONENT NOT PRESENT
			HEAVY LIQUID SERVICE (INSTRUMENTATION SYSTEMS = COMPONENT NOT PRESENT
			ANY (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT
			HEAVY LIQUID SERVICE (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT

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			ANY (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT
			BYPASS LINES = FUGITIVE UNIT WITH A CLOSED-VENT SYSTEM DOES NOT CONTAIN A BY-PASS LINE THAT COULD DIVERT A VENT STREAM AWAY FROM THE CONTROL DEVICE AND TO THE ATMOSPHERE
			UNSAFE TO INSPECT = FUGITIVE UNIT CONTAINS ANY CLOSED-VENT SYSTEM WITH PARTS DESIGNATED AS UNSAFE TO INSPECT
			DIFFICULT TO INSPECT = FUGITIVE UNIT CONTAINS ANY CLOSED-VENT SYSTEM WITH PARTS DESIGNATED AS DIFFICULT TO INSPECT
			EMPLOYEE NUMBER = THE CORPORATION EMPLOYS 100 OR MORE PERSONS
130CT110	40 CFR Part 63, Subpart Q	63Q-1	Used Compounds Containing Chromium on or After September 8, 1994 = The industrial process cooling tower has not used compounds containing chromium on or after September 8, 1994.
CT106A	40 CFR Part 63, Subpart Q	63Q-1	Used Compounds Containing Chromium on or After September 8, 1994 = The industrial process cooling tower has not used compounds containing chromium on or after September 8, 1994.
CT106B	40 CFR Part 63, Subpart Q	63Q-1	Used Compounds Containing Chromium on or After September 8, 1994 = The industrial process cooling tower has not used compounds containing chromium on or after September 8, 1994.
CT106C	40 CFR Part 63, Subpart Q	63Q-1	Used Compounds Containing Chromium on or After September 8, 1994 = The industrial process cooling tower has not used compounds containing chromium on or after September 8, 1994.
126T223	40 CFR Part 63, Subpart	63G-1	Overlap = Title 40 CFR Part 60, Subpart NNN
	G		Group 1 = The process vent meets the definition of a Group 1 process vent.
			Control Device = Condenser used as a recapture device.
			Halogenated = Vent stream is not halogenated.
			Performance Test = No previous performance test was conducted.
			Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.
			Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.
			By-pass Lines = The vent system does not contain by-pass lines that can divert the vent stream from the control device.
GRP-VENT	30 TAC Chapter 115, Vent Gas Controls	115B-1	Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.
			Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.
			Vent Type = Vent gas stream emissions of the specified classes of VOCs including aldehydes, alcohols, aromatics, ethers, olefins, peroxides, amines, acids, esters, ketones, sulfides, and branched chain hydrocarbons (C8 and above).
			Alternate Control Requirement = Alternate control is not used.
			Control Device Type = Direct flame incinerator in which the vent gas stream is burned at a temperature or at least 1300° F (704 C).
GRP-VENT	30 TAC Chapter 115, Vent Gas Controls	115B-2	Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.
			Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control
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			device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.
			Vent Type = Vent gas stream emissions of the specified classes of VOCs including aldehydes, alcohols, aromatics, ethers, olefins, peroxides, amines, acids, esters, ketones, sulfides, and branched chain hydrocarbons (C8 and above).
			Alternate Control Requirement = Alternate control is not used.
			Control Device Type = Smokeless flare
GRP-VENT	30 TAC Chapter 115, Vent Gas Controls	115B-3	Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.
			Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.
			Vent Type = Vent gas stream emissions of the specified classes of VOCs including aldehydes, alcohols, aromatics, ethers, olefins, peroxides, amines, acids, esters, ketones, sulfides, and branched chain hydrocarbons (C8 and above).
			Alternate Control Requirement = Alternate control is not used.
			Control Device Type = Other vapor control/recovery system, as defined in 30 TAC § 115.10
GRP-DISTILL1	40 CFR Part 60, Subpart NNN	60NNN-1	Subpart NNN Chemicals = The distillation unit produces any chemical listed in 40 CFR § 60.667 as a product, co-product, by-product, or intermediate.
			Construction/Modification Date = On or before December 30, 1983.
GRP-DISTILL2	40 CFR Part 60, Subpart	60NNN-1	Subpart NNN Chemicals = The distillation unit does not produce any chemical listed in 40 CFR § 60.667 as a product, co-product, by-product, or intermediate.
126V3006	40 CFR Part 60, Subpart RRR	60RRR-1	Chemicals Listed in 40 CFR § 60.707 = The affected facility is part of a process unit that produces chemicals listed in 40 CFR § 60.707 as a product, co-product, by product, or intermediate.
			Construction/Modification Date = After June 29, 1990.
			Affected Facility Type = Combination of a reactor process and the recovery system into which its vent stream is discharged.
			Subject to Title 40 CFR Part 60, Subpart DDD = The reactor process is not subject to the provisions of Title 40 CFR Part 60, Subpart DDD.
			Subject to Title 40 CFR Part 60, Subpart NNN = The vent stream is not routed to a distillation unit subject to Title 40 CFR Part 60, Subpart NNN or has other releases to the air than from a pressure relief valve.
			TRE Index Value = TRE index value is greater than 8.0.
			TRE for Halogenated Vent Stream = TRE index value is being calculated for a nonhalogenated vent stream.
130HE-1708	40 CFR Part 60, Subpart RRR	60RRR-1	Chemicals Listed in 40 CFR § 60.707 = The affected facility is part of a process unit that produces chemicals listed in 40 CFR § 60.707 as a product, co-product, by product, or intermediate.
			Construction/Modification Date = On or before June 29, 1990.
130HE-2606	40 CFR Part 60, Subpart RRR	60RRR-1	Chemicals Listed in 40 CFR § 60.707 = The affected facility is part of a process unit that produces chemicals listed in 40 CFR § 60.707 as a product, co-product, by product, or intermediate.
			Construction/Modification Date = On or before June 29, 1990.
130T-203	40 CFR Part 60, Subpart RRR	60RRR-1	Chemicals Listed in 40 CFR § 60.707 = The affected facility is part of a process unit that produces chemicals listed in 40 CFR § 60.707 as a product, co-product, by product, or intermediate.
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			Construction/Modification Date = On or before June 29, 1990.
130T-271	40 CFR Part 60, Subpart RRR	60RRR-1	Chemicals Listed in 40 CFR § 60.707 = The affected facility is part of a process unit that produces chemicals listed in 40 CFR § 60.707 as a product, co-product, by product, or intermediate.  Construction/Modification Date = On or before June 29, 1990.
130V-1296	40 CFR Part 60, Subpart RRR	60RRR-1	Chemicals Listed in 40 CFR § 60.707 = The affected facility is part of a process unit that produces chemicals listed in 40 CFR § 60.707 as a product, co-product, by product, or intermediate.  Construction/Modification Date = On or before June 29, 1990.
130V-2615	40 CFR Part 60, Subpart RRR	60RRR-1	Chemicals Listed in 40 CFR § 60.707 = The affected facility is part of a process unit that produces chemicals listed in 40 CFR § 60.707 as a product, co-product, by product, or intermediate.  Construction/Modification Date = On or before June 29, 1990.
GRP-REACTORS	40 CFR Part 60, Subpart RRR	60RRR-1	Chemicals Listed in 40 CFR § 60.707 = The affected facility is not part of a process unit that produces chemicals listed in 40 CFR § 60.707 as a product, co-product, by product, or intermediate.
GRP-PROCESS	40 CFR Part 63, Subpart F	63F-1	Applicable Chemicals = The chemical manufacturing process unit manufactures, as a primary product, one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or 40 CFR § 63.100(b)(1)(ii).
			Table 2 HAP = The chemical manufacturing process unit uses as a reactant or manufactures, as a product or co-product, one or more of the organic hazardous air pollutants in Table 2.
			Alternate Means of Emission Limitation = No alternative means of emission limitation has been approved by the EPA Administrator to achieve a reduction in organic HAP emission or no alternate has been requested.
			Heat Exchange System = No heat exchange system is utilized.
			Cooling Water Pressure = The heat exchange system is not operated with the minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side.
			Intervening Cooling Fluid = There is no intervening cooling fluid containing less than 5 percent by weight of total HAPs listed in Table 4 of 40 CFR Part 63, Subpart F, between the process and cooling water.
			Table 4 HAP Content = The recirculating heat exchange system is used exclusively to cool process fluids that contain less than 5 percent by weight of total HAPs listed in Table 4 of title 40 CFR Part 63, Subpart F.
			NPDES Permit = The once-through heat exchange system is not subject to NPDES permit with an allowable discharge limit of 1 part per million or less above influent concentration or 10 percent or less above influent concentration.
			Meets 40 CFR 63.104(a)(4)(i)-(iv) = The once-through heat exchange system is not subject to an NPDES permit that meets 40 CFR § 63.104(a)(4)(i) - (iv).
			Table 9 HAP Content = The once-through heat exchange system is used exclusively to cool process fluids that contain less than 5 percent by weight of total HAPs listed in Table 9 of 40 CFR Part 63, Subpart G.
			Cooling Water Monitored = The cooling water is being monitored for the presence of one or more HAPs or other representative substances whose presence in cooling water indicates a leak.

<sup>\* -</sup> The "unit attributes" or operating conditions that determine what requirements apply

#### **NSR Versus Title V FOP**

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

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

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

#### **New Source Review Requirements**

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

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

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

www.tceq.texas.gov/permitting/air/nav/air\_status\_permits.html

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

#### **New Source Review Authorization References**

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits by Rule, PSD Permits, or NA Permits) for the Application Area.		
Authorization No.: 19340	Issuance Date: 06/14/2017	
Authorization No.: 24875	Issuance Date: 03/11/2024	
Authorization No.: 29966	Issuance Date: 08/30/2019	
Authorization No.: 83848	Issuance Date: 12/13/2019	
Permits by Rule (30 TAC Chapter 106) for the Application Area		
Number: 106.261	Version No./Date: 11/01/2003	
Number: 106.262	Version No./Date: 11/01/2003	
Number: 106.263	Version No./Date: 11/01/2001	
Number: 106.472	Version No./Date: 09/04/2000	
Number: 106.476	Version No./Date: 09/04/2000	
Number: 106.478	Version No./Date: 09/04/2000	

#### **Permits by Rule**

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

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

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

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

The application, or a previously submitted application, contains a PBR Supplemental Table. This table provides supplemental information for all PBR authorizations at the site or application area, including PBRs that are not listed on the OP-REQ1 form. PBRs that are not listed on the OP-REQ1 form authorize emission units that the TCEQ has determined are insignificant sources of emissions (IEUs). PBRs are enforceable through permit condition number 16. The EPA gives States broad discretion in prescribing monitoring, recordkeeping, and reporting for generally applicable requirements that cover insignificant emission units. (see EPA White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program). Federal regulations specifically identify recordkeeping as an appropriate level of monitoring necessary to assure compliance with the requirements applicable to an emissions unit. Permitting authorities have the best sense of where it is appropriate to conclude that periodic monitoring is not necessary for IEUs, when state program rules already provide sufficient monitoring for these units.

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

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

#### **Emission Units and Emission Points**

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

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

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

#### **Monitoring Sufficiency**

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

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

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

#### **Periodic Monitoring:**

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

Unit/Group/Process Information			
ID No.: 126V2474			
Control Device ID No.: N/A Control Device Type: N/A			
Applicable Regulatory Requirement			
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: 115B-1		
Pollutant: VOC	Main Standard: § 115.112(b)(1)		
Monitoring Information			
Indicator: Internal Floating Roof			
Minimum Frequency: annually			
Averaging Period: n/a			
Deviation Limit: Any defects detected shall be considered and reported as a deviation.			

Basis of monitoring: Visual inspections of the external or internal floating roof to ensure: that the roof is floating on the surface of the VOC and not on the leg supports, liquid has not accumulated on the external floating roof, the seals are not detached, and there are no holes or tears in the seal fabric; provides an assurance of compliance that it is operating in accordance with its design to meet the required control efficiency. Visually inspecting the external floating roof or the internal floating roof is commonly required in federal and state rules, including: 40 CFR Part 60, Subpart Kb; 40 CFR Part 61, Subpart Y; and 30 TAC Chapter 115, Subchapter B, Division 1: Storage of VOCs. Measuring and recording the accumulated area of gaps if the tank is equipped with primary seals is commonly required in federal and state rules, including: 40 CFR Part 60, Subpart Kb; 40 CFR Part 61, Subpart Y; 40 CFR 63 Subparts VV, DD, and MMM; and 30 TAC Chapter 115, Subchapter B, Division 1: Storage of VOCs.

Unit/Group/Process Information		
ID No.: 126V883		
Control Device ID No.: MO3  Control Device Type: Thermal incinerator (direct flame incinerator/regenerative thermal oxidizer)		
Applicable Regulatory Requirement		
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: 115B-1	
Pollutant: VOC	Main Standard: § 115.112(b)(1)	

Indicator: Combustion Temperature / Exhaust Gas Temperature

Minimum Frequency: Once per week

Averaging Period: n/a

Deviation Limit: Minimum combustion temperature shall not be below 1300 degrees F.

Basis of monitoring: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.

Unit/Group/Process Information	
ID No.: 126V883	
Control Device ID No.: 310 B12	Control Device Type: Steam generating unit (boiler)/process heater (design heat input is greater than or equal to 44 megawatts)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: 115B-3
Pollutant: VOC	Main Standard: § 115.112(b)(1)
Monitoring Information	

Indicator: Period of Operation

Minimum Frequency: n/a

Averaging Period: n/a

Deviation Limit: Record periods of operation. If the boiler is not operational when the storage tank is being vented to the boiler, a deviation shall be reported.

Basis of monitoring: A common way to control VOC emissions is to route emissions to a boiler or process heater with a design heat input capacity of 44 MW or greater with minimum temperatures of 1100 °C and residence times greater than one second. Boilers and process heaters with the stated design have demonstrated to meet 98% reduction efficiency; therefore, it is only necessary to document the period of operation of the control equipment. Additionally, in the October, 21, 1983 preamble to 40 CFR Part 60, Subpart III, (48 FR 48945), the EPA determined that installing a steam generating unit, with a design heat input capacity of 44 MW or greater, to control VOC emissions, is an acceptable means of demonstrating compliance with 40 CFR Part 60, Subpart III and waived the requirement for a performance test on such devices. Monitoring the period of operation of a boiler/process heater greater than 44 MW is commonly required in federal rules, including: 40 CFR Part 60, Subparts III and NNN; 40 CFR Part 61, Subpart BB; 40 CFR Part 63, Subpart G.

# Unit/Group/Process Information ID No.: 129V1274 Control Device ID No.: N/A Applicable Regulatory Requirement Name: 30 TAC Chapter 115, Storage of VOCs Pollutant: VOC Main Standard: § 115.112(b)(1)

#### **Monitoring Information**

Indicator: Internal Floating Roof
Minimum Frequency: annually

Averaging Period: n/a

Deviation Limit: Any defects detected shall be considered and reported as a deviation.

Basis of monitoring: Visual inspections of the external or internal floating roof to ensure: that the roof is floating on the surface of the VOC and not on the leg supports, liquid has not accumulated on the external floating roof, the seals are not detached, and there are no holes or tears in the seal fabric; provides an assurance of compliance that it is operating in accordance with its design to meet the required control efficiency. Visually inspecting the external floating roof or the internal floating roof is commonly required in federal and state rules, including: 40 CFR Part 60, Subpart Kb; 40 CFR Part 61, Subchapter B, Division 1: Storage of VOCs. Measuring and recording the accumulated area of gaps if the tank is equipped with primary seals is commonly required in federal and state rules, including: 40 CFR Part 60, Subpart Kb; 40 CFR Part 61, Subpart Y; 40 CFR 63 Subparts VV, DD, and MMM; and 30 TAC Chapter 115, Subchapter B, Division 1: Storage of VOCs.

## Unit/Group/Process Information ID No.: 129V755 Control Device ID No.: N/A Applicable Regulatory Requirement Name: 30 TAC Chapter 115, Storage of VOCs Pollutant: VOC Main Standard: § 115.112(b)(1)

#### **Monitoring Information**

Indicator: Liquid Level

Minimum Frequency: At the end of each unloading operation

Averaging Period: n/a

Deviation Limit: It shall be considered and reported as a deviation anytime the liquid volume falls below the liquid volume at the fill pipe.

Basis of monitoring: The periodic monitoring option provided for emission units using a submerged fill pipe is location of the submerged fill pipe and structural integrity of the pipe. The location and the integrity of the pipe ensure that loading operations are controlled to prevent splash fill and reduce generated vapors; therefore, less emissions are released to the atmosphere.

Unit/Group/Process Information		
ID No.: 129V755		
Control Device ID No.: N/A Control Device Type: N/A		
Applicable Regulatory Requirement		
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: 115B-1	
Pollutant: VOC	Main Standard: § 115.112(b)(1)	

Indicator: Structural Integrity of the Pipe

Minimum Frequency: Emptied and degassed

Averaging Period: n/a

Deviation Limit: It shall be considered and reported as a deviation if the repairs are not completed prior to refilling the storage vessel.

Basis of monitoring: The periodic monitoring option provided for emission units using a submerged fill pipe is location of the submerged fill pipe and structural integrity of the pipe. The location and the integrity of the pipe ensure that loading operations are controlled to prevent splash fill and reduce generated vapors; therefore, less emissions are released to the atmosphere.

Unit/Group/Process Information	
ID No.: GRP-TANKS1	
Control Device ID No.: MO3	Control Device Type: Thermal incinerator (direct flame incinerator/regenerative thermal oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: 115B-1
Pollutant: VOC	Main Standard: § 115.112(b)(1)

Indicator: Combustion Temperature / Exhaust Gas Temperature

Minimum Frequency: Once per week

Averaging Period: n/a

Deviation Limit: Minimum combustion temperature shall not be below 1300 degrees F.

Basis of monitoring: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.

Unit/Group/Process Information	
ID No.: GRP-TANKS1	
Control Device ID No.: 310 B12	Control Device Type: Steam generating unit (boiler)/process heater (design heat input is greater than or equal to 44 megawatts)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: 115B-3
Pollutant: VOC	Main Standard: § 115.112(b)(1)
Monitoring Information	

Indicator: Period of Operation

Minimum Frequency: n/a

Averaging Period: n/a

Deviation Limit: Record all periods of operation. If the boiler is non-operational during periods when it is receiving vent gas, it shall be reported as a deviation.

Basis of monitoring: A common way to control VOC emissions is to route emissions to a boiler or process heater with a design heat input capacity of 44 MW or greater with minimum temperatures of 1100 °C and residence times greater than one second. Boilers and process heaters with the stated design have demonstrated to meet 98% reduction efficiency; therefore, it is only necessary to document the period of operation of the control equipment. Additionally, in the October, 21, 1983 preamble to 40 CFR Part 60, Subpart III, (48 FR 48945), the EPA determined that installing a steam generating unit, with a design heat input capacity of 44 MW or greater, to control VOC emissions, is an acceptable means of demonstrating compliance with 40 CFR Part 60, Subpart III and waived the requirement for a performance test on such devices. Monitoring the period of operation of a boiler/process heater greater than 44 MW is commonly required in federal rules, including: 40 CFR Part 60, Subparts III and NNN; 40 CFR Part 61, Subpart BB; 40 CFR Part 63, Subpart G.

Unit/Group/Process Information	
ID No.: GRP-TANKS2	
Control Device ID No.: MO3	Control Device Type: Thermal incinerator (direct flame incinerator/regenerative thermal oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: 115B-1
Pollutant: VOC	Main Standard: § 115.112(b)(1)

Indicator: Combustion Temperature / Exhaust Gas Temperature

Minimum Frequency: Once per week

Averaging Period: n/a

Deviation Limit: Minimum combustion temperature shall not be below 1300 degrees F.

Basis of monitoring: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.

Unit/Group/Process Information	
ID No.: GRP-TANKS2	
Control Device ID No.: 310 B12	Control Device Type: Steam generating unit (boiler)/process heater (design heat input is greater than or equal to 44 megawatts)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: 115B-3
Pollutant: VOC	Main Standard: § 115.112(b)(1)
Monitoring Information	

Indicator: Period of Operation

Minimum Frequency: n/a

Averaging Period: n/a

Deviation Limit: Record all periods of operation. If the boiler is non-operational during periods when it is receiving vent gas, it shall be reported as a deviation.

Basis of monitoring: A common way to control VOC emissions is to route emissions to a boiler or process heater with a design heat input capacity of 44 MW or greater with minimum temperatures of 1100 °C and residence times greater than one second. Boilers and process heaters with the stated design have demonstrated to meet 98% reduction efficiency; therefore, it is only necessary to document the period of operation of the control equipment. Additionally, in the October, 21, 1983 preamble to 40 CFR Part 60, Subpart III, (48 FR 48945), the EPA determined that installing a steam generating unit, with a design heat input capacity of 44 MW or greater, to control VOC emissions, is an acceptable means of demonstrating compliance with 40 CFR Part 60, Subpart III and waived the requirement for a performance test on such devices. Monitoring the period of operation of a boiler/process heater greater than 44 MW is commonly required in federal rules, including: 40 CFR Part 60, Subparts III and NNN; 40 CFR Part 61, Subpart BB; 40 CFR Part 63, Subpart G.

Unit/Group/Process Information	
ID No.: GRP-TANKS3	
Control Device ID No.: MO3	Control Device Type: Thermal incinerator (direct flame incinerator/regenerative thermal oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: 115B-1
Pollutant: VOC	Main Standard: § 115.112(b)(1)

Indicator: Combustion Temperature / Exhaust Gas Temperature

Minimum Frequency: Once per week

Averaging Period: n/a

Deviation Limit: Minimum combustion temperature shall not be below 1300 degrees F.

Basis of monitoring: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.

Unit/Group/Process Information	
ID No.: GRP-TANKS3	
Control Device ID No.: 310 B12	Control Device Type: Steam generating unit (boiler)/process heater (design heat input is greater than or equal to 44 megawatts)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: 115B-3
Pollutant: VOC	Main Standard: § 115.112(b)(1)
Monitoring Information	

Indicator: Period of Operation

Minimum Frequency: n/a

Averaging Period: n/a

Deviation Limit: Record all periods of operation. If the boiler is non-operational during periods when it is receiving vent gas, it shall be reported as a deviation.

Basis of monitoring: A common way to control VOC emissions is to route emissions to a boiler or process heater with a design heat input capacity of 44 MW or greater with minimum temperatures of 1100 °C and residence times greater than one second. Boilers and process heaters with the stated design have demonstrated to meet 98% reduction efficiency; therefore, it is only necessary to document the period of operation of the control equipment. Additionally, in the October, 21, 1983 preamble to 40 CFR Part 60, Subpart III, (48 FR 48945), the EPA determined that installing a steam generating unit, with a design heat input capacity of 44 MW or greater, to control VOC emissions, is an acceptable means of demonstrating compliance with 40 CFR Part 60, Subpart III and waived the requirement for a performance test on such devices. Monitoring the period of operation of a boiler/process heater greater than 44 MW is commonly required in federal rules, including: 40 CFR Part 60, Subparts III and NNN; 40 CFR Part 61, Subpart BB; 40 CFR Part 63, Subpart G.

Unit/Group/Process Information	
ID No.: GRP-VENT	
Control Device ID No.: MO3	Control Device Type: Thermal incinerator (direct flame incinerator/regenerative thermal oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: 115B-1
Pollutant: VOC	Main Standard: § 115.122(b)

Indicator: Combustion Temperature / Exhaust Gas Temperature

Minimum Frequency: Once per week

Averaging Period: n/a

Deviation Limit: Minimum combustion temperature shall not be below 1300 degrees F.

Basis of monitoring: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.

Unit/Group/Process Information	
ID No.: GRP-VENT	
Control Device ID No.: MS FLARE	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: 115B-2
Pollutant: VOC	Main Standard: § 115.122(b)

Indicator: Pilot Flame

Minimum Frequency: Once per hour

Averaging Period: n/a

Deviation Limit: The lack of a pilot flame when vent gas is being controlled by the flare shall be considered and reported as a deviation.

Basis of monitoring: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.

Unit/Group/Process Information	
ID No.: GRP-VENT	
Control Device ID No.: 310 B12	Control Device Type: Steam generating unit (boiler)/process heater (design heat input is greater than or equal to 44 megawatts)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: 115B-3
Pollutant: VOC	Main Standard: § 115.122(b)
Monitoring Information	

Indicator: Period of Operation

Minimum Frequency: n/a

Averaging Period: n/a

Deviation Limit: Record all periods of operation. If the boiler is non-operational during periods when it is receiving vent gas, it shall be reported as a deviation.

Basis of monitoring: A common way to control VOC emissions is to route emissions to a boiler or process heater with a design heat input capacity of 44 MW or greater with minimum temperatures of 1100 °C and residence times greater than one second. Boilers and process heaters with the stated design have demonstrated to meet 98% reduction efficiency; therefore, it is only necessary to document the period of operation of the control equipment. Additionally, in the October, 21, 1983 preamble to 40 CFR Part 60, Subpart III, (48 FR 48945), the EPA determined that installing a steam generating unit, with a design heat input capacity of 44 MW or greater, to control VOC emissions, is an acceptable means of demonstrating compliance with 40 CFR Part 60, Subpart III and waived the requirement for a performance test on such devices. Monitoring the period of operation of a boiler/process heater greater than 44 MW is commonly required in federal rules, including: 40 CFR Part 60, Subparts III and NNN; 40 CFR Part 61, Subpart BB; 40 CFR Part 63, Subpart G.

#### **Obtaining Permit Documents**

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

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

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

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

1.

www.tceq.texas.gov/permitting/air/permitbyrule/historical\_rules/old106list/index106.html 2.

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

www.tceq.texas.gov/permitting/air/permitbyrule/historical rules/oldselist/se index.html

Additional information concerning PBRs is available on the TCEQ website:

https://www.tceg.texas.gov/permitting/air/nav/air pbr.html

#### **Compliance Review**

- In accordance with 30 TAC Chapter 60, the compliance history was reviewed on <u>February 19, 2025.</u>
   Site rating: <u>0.33 / Satisfactory</u> Company rating: <u>0.33 / Satisfactory</u>
   (High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55)
- 2. Has the permit changed based on the compliance history or site/company rating?......No

#### Site/Permit Area Compliance Status Review

#### **Available Unit Attribute Forms**

- OP-UA1 Miscellaneous and Generic Unit Attributes
- OP-UA2 Stationary Reciprocating Internal Combustion Engine Attributes
- OP-UA3 Storage Tank/Vessel Attributes
- OP-UA4 Loading/Unloading Operations Attributes
- OP-UA5 Process Heater/Furnace Attributes
- OP-UA6 Boiler/Steam Generator/Steam Generating Unit Attributes
- OP-UA7 Flare Attributes
- OP-UA10 Gas Sweetening/Sulfur Recovery Unit Attributes
- **OP-UA11 Stationary Turbine Attributes**
- OP-UA12 Fugitive Emission Unit Attributes
- OP-UA13 Industrial Process Cooling Tower Attributes
- OP-UA14 Water Separator Attributes
- OP-UA15 Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes
- OP-UA16 Solvent Degreasing Machine Attributes
- OP-UA17 Distillation Unit Attributes
- OP-UA18 Surface Coating Operations Attributes
- OP-UA19 Wastewater Unit Attributes
- OP-UA20 Asphalt Operations Attributes
- OP-UA21 Grain Elevator Attributes
- OP-UA22 Printing Attributes
- OP-UA24 Wool Fiberglass Insulation Manufacturing Plant Attributes
- OP-UA25 Synthetic Fiber Production Attributes

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