

Permit by Rule (PBR) Registration Technical Review

Company:	Tradebe Environmental Services, LLC	Registration No.:	180071
Nearest City:	La Porte	Project No.:	393332
County:	Harris	Project Type:	Initial
Project Reviewer:	Grace King	Regulated Entity No.:	RN112206966
Unit Name:	Tradebe Environmental Services	Customer Reference No.:	CN605523802
PBR No(s).:	106.263	Project Received Date:	May 5, 2025
Physical Location:	200 S 16th St Ste 200		

Project Overview / Process Description

Tradebe Environmental Services, LLC owns and operates the Tradebe Environmental Services site located in Harris, County. Tradebe owns and operates a mobile fuel gas combustion device (FGCD) that is primarily used for temporary maintenance activities at refineries and chemical plants.

The temporary maintenance activity involves cleaning storage tanks, process unit vessels, and piping at petroleum refineries at various petroleum facilities located in the State of Texas. The cleaning process will involve the use of portable thermal oxidizer for the destruction of volatile organic compounds (VOCs) during degassing. The portable Thermal Oxidizer Unit (TOU) is used for the degassing of the fuel or chemical storage tanks.

No emissions are being authorized from the thermal oxidizer with this project. The owner of the site where the thermal oxidizer will utilized will need to authorize emissions from the unit as part of their MSS operations.

Permit by Rule Requirements - 30 TAC Chapter 106

General Requirements

Registration Fee Reference No.:	Application fee: 765202 / 582EA000666596
Is this registration certified?	No
Is planned MSS included in the registration?	Yes
Are there affected NSR or Title V authorizations for the project?	No
Are there any upstream or downstream affects associated with this registration?	No
Are associated upstream/downstream emissions either included in the registration OR within current permitted limits with no changes to underlying air authorizations for the applicable units regarding BACT, health and environmental impacts, or other representations.	NA
Are emissions for each PBR authorized facility less than the § 106.4(a)(1) limits?	Yes
Are total emissions from all sitewide PBR authorized facilities less than the § 106.4(a)(4) limits, OR has the site been subject to public notice requirements?	Yes, sitewide emissions are less than 106.4 limits
Are there permit limits on using PBRs at the site?	No
Is the facility subject to the NO _x Mass Cap and Trade Program?	No, NOX emissions associated with this project.
Is the facility in compliance with all other applicable rules and regulations?	Yes
Notes:	

Federal Applicability

Does this project trigger a PSD or Nonattainment review?	No
Does the Major NSR applicability analysis include all associated upstream and/or downstream emissions?	NA
Are there any applicable standards under NSPS, NESHAP, or NESHAP for source categories (MACT)?	No
Notes:	

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Permit by Rule Requirements - Compliance Demonstrations

PBR 106.263 Routine Maintenance, Startup and Shutdown of Facilities, and Temporary Maintenance Facilities

(a) This section authorizes routine maintenance, start-up and shutdown of facilities, and specific temporary maintenance facilities except as specified in subsection (b) of this section.

(b) NA, No emissions associated with the facilities and/or processes defined in subsection (b) are authorized with this registration.

(c) The following activities and facilities are authorized under this section:

(3) temporary maintenance facilities which are constructed in conjunction with maintenance activities. Temporary maintenance facilities include only the following:

(D) flares, vapor combustors, catalytic oxidizers, thermal oxidizers, carbon adsorption units, and other control devices used to control vent gases released during the degassing of immovable, fixed process vessels, storage vessels, and associated piping to atmospheric pressure, plus cleaning apparatus that will have or cause emissions;

(d) NA, the facility is a temporary maintenance facility.

(e) In addition to the emission limits in subsection (f) of this section, specific temporary maintenance facilities as listed in subsection (c)(3) of this section must meet the following additional requirements:

(1) flares or vapor combustors must meet the requirements of §106.492(1) and (2)(C) of this title (relating to Flares);

(2) catalytic oxidizers must meet the requirements of §106.533(5)(C) of this title (relating to Water and Soil Remediation);

(3) thermal oxidizers must meet the requirements of §106.493(2) and (3) of this title (relating to Direct Flame Incinerators);

(4) carbon adsorption systems must meet the requirements of §106.533(5)(D) of this title

(5) other control devices used to control vents caused by the degassing of process vessels, storage vessels, and associated piping must have an overall vapor collection and destruction or removal efficiency of at least 90%;

(6) any temporary maintenance facility that cannot meet all applicable limitations of this section must obtain authorization under Chapter 116 of this title; and

(7) temporary maintenance facilities may not operate at a given location for longer than 180 consecutive days or the completion of a single project unless the facility is registered. If a single project requires more than 180 consecutive days to complete, the facilities must be registered using a PI-7 Form, along with documentation on the project. Registration and supporting documentation shall be submitted upon determining the length of the project will exceed 180 days, but no later than 180 days after the project begins

(f) All emissions covered by this section are limited to, collectively and cumulatively, less than any applicable emission limit under §106.4(a)(1) - (3) of this title (relating to Requirements for Permitting by Rule) in any rolling 12-month period.

(g) All required records will be maintained at the facility.

Notes:

Compliance History and Site Review

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

May 27, 2025

Site rating / classification: **N/A**

Company rating / classification:

Unclassified

Has any action occurred on the basis of the compliance history or rating?

No

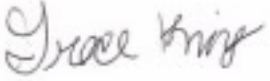
Emission Summary

EPN / Emission Source	VOC		NOx		CO		PM ₁₀		PM _{2.5}		SO ₂		Other	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
No emissions are being authorized with this project.														
TOTAL EMISSIONS (TPY):	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MAXIMUM OPERATING SCHEDULE: Hours/Year														8,760

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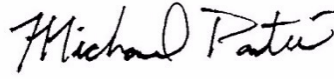
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06/18/2025

Ms. Grace King
Permit Reviewer
Rule Registration Section

Date



06/19/2025

Michael Partee, Manager
Rule Registrations Section
Air Permits Division

Date