

## APPENDIX T BPA RACT Review

In response to a request by EPA, TCEQ reviewed the point source inventory to confirm that all major sources are covered by RACT rules. The commission reviewed its rules for control of VOC emissions in 30 TAC Chapter 115 and confirmed that, with the exception of the batch process rules and the shipbuilding and ship repair rules, there are no exemptions for sources that would be considered major with a major source level of 50 tpy. The commission is adopting changes to the batch process, ship building, and ship repair rules to change the exemption level to 50 tpy. The rules in Chapter 117 regarding control of NO<sub>x</sub> emissions define a major source in the Beaumont-Port Arthur area as a source emitting 50 tpy or greater.

The following tables present the point source emission inventory (EI) for 2002. The accounts have been sorted in descending order of VOC emissions and NO<sub>x</sub> emissions in tpy.

Any site with actual emissions greater than 100 tpy would have been considered a major source prior to redesignation of the BPA as a serious nonattainment area with respect to the 1-hour standard. Because the EI reports actual emissions, there may be sites with actual emissions less than 100 tpy that have a potential to emit 100 tpy or more. Thus, these sources were also considered as major sources prior to the redesignation. There may also be sites with actual emissions less than 50 tpy that have potential to emit 50 tpy or more. The commission has reviewed the Title V database to determine whether a Title V permit has been issued or whether an application for a Title V permit has been submitted for the account. If a Title V permit exists, it was assumed that the site has potential to emit (PTE) 100 tpy or more of VOC and is covered by appropriate RACT (unless the site is major for another pollutant but not VOC). If no application had been submitted, it was assumed that the account is not a major source at the 50 tpy level. EPA did not request review of sources with potential to emit less than 50 tpy.

The review indicates only nine sites might be classified as major sources at the 50 tpy definition that were not already considered major at the 100 tpy definition. One of these sites would be covered by RACT under the change to the shipbuilding and ship repair rules. The other sites are covered by appropriate RACT rules.

Because the NO<sub>x</sub> RACT rules in Chapter 117 already apply to any site with potential to emit 50 tpy or more NO<sub>x</sub>, the NO<sub>x</sub> sources have not been assigned to categories for evaluation. Any site that has 50 tpy or more of NO<sub>x</sub> is already covered by RACT rules.