



**Texas Commission on Environmental Quality  
Form OP-UA62 - Instructions  
Glycol Dehydration Unit Attributes**

**General:**

This form is used to provide a description and data pertaining to all emission points, stationary vents, distillation operation vents and process vents with potentially applicable requirements associated with a particular account number and application. Each table number, along with the possibility of a corresponding letter (i.e., Table 1a, Table 1b), corresponds to a certain state or federal rule. If the rule on the table is not potentially applicable to an emission point, stationary vent, distillation operation vent and/or process vent, then it should be left blank and need not be submitted with the application. If the codes entered by the applicant show negative applicability to the rule or sections of the rule represented on the table, then the applicant need not complete the remainder of the table(s) that corresponds to the rule. Further instruction as to which questions should be answered and which questions should not be answered are located in the “Specific” section of the instruction text. The following is included in this form:

**Tables 1a - 1b:** Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)  
Subpart HH: National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities

The Texas Commission on Environmental Quality (TCEQ) primary account number (XX-XXXX-X) and the application area name from Form OP-1 (Site Information Summary) must appear in the header of each page for the purpose of identification for the initial submittal. The date of the initial form submittal must also be included and should be consistent throughout the application (MM/DD/YYYY). **Leave the permit number blank for the initial form submittal.** If this form is included as part of the permit revision process, enter the permit number assigned by the TCEQ, the area name (from Form OP-1), the date of the revision submittal, and the account number.

Unit attribute questions that do not require a response from all applicants are preceded by qualification criteria in the instructions. If the unit does not meet the qualification criteria, a response to the question is not required. **Anytime a response is not required based on the qualification criteria, leave the space on the form blank.**

**Notwithstanding any qualification criteria in the form instructions or information provided in other TCEQ guidance, the applicant may leave an attribute question blank (or indicate “N/A” for “Not Applicable”) if the attribute is not needed for the applicable requirement determinations of a regulation for a unit.**

In some situations, the applicant has the option of selecting alternate requirements, limitations, and/or practices for a unit. Note that these alternate requirements, limitations, and/or practices must have the required approval from the TCEQ Executive Director and/or the U.S. Environmental Protection Agency (EPA) Administrator before the federal operating permit application is submitted.

The TCEQ requires that a Core Data Form be submitted on all incoming registrations unless a Regulated Entity and Customer Reference Number has been issued by the TCEQ and no core data information has changed. If a Regulated Entity or Customer Number has been issued, then the number must be noted on the request or applicable form. For more information regarding the Core Data Form, call (512) 239-5175 or go to the TCEQ Web site at [www.tceq.state.tx.us/permitting/central\\_registry/guidance.html](http://www.tceq.state.tx.us/permitting/central_registry/guidance.html).

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**Specific:**

**Table 1a:** Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)  
**Subpart HH: National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities**

*Complete Tables 1a - 1b only for glycol dehydration unit process vents located at oil and natural gas production facilities which meet the criteria specified in 40 CFR § 63.760(a)(1) and either 40 CFR § 63.760(a)(2) or (a)(3), but not meeting an exemption specified in 40 CFR § 63.760(e).*

**EMISSION POINT ID NO.:** Enter the identification number (ID No.) for the glycol dehydration unit process vent (maximum 10 characters) as listed on Form OP-SUM.

**SOP/GOP INDEX NO.:** Site operating permit (SOP) applicants should indicate the SOP index number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). General operating permit (GOP) applicants should indicate the appropriate GOP index number in this column from the applicable GOP table (SSS-FF-XXX). Applicants should complete all applicable GOP attribute information before determining the GOP index number. For additional information relating to SOP and GOP index numbers please refer to the TCEQ guidance document entitled “Federal Operating Permit Application Guidance Document.”

**ALTERNATE MEANS OF EMISSION LIMITATION (AMEL):** Enter “YES” if the EPA Administrator has approved an AMEL in accordance with 40 CFR § 63.777. Otherwise, enter “NO.”

**AMEL ID NO.:** If an AMEL has been approved, then enter the corresponding AMEL unique identifier (maximum 10 characters) for each unit. If the unique identifier is unavailable then enter the date of the AMEL approval letter. The unique identifier and/or the date of the approval letter is contained in the compliance file under the appropriate account number. Otherwise, leave this column blank.

▼ **Continue Only if “Alternate Means of Emission Limitation” is “NO”.**

**ANNUAL AVERAGE FLOWRATE:** Select one of the following options for the actual annual average flowrate of natural gas to the glycol dehydration unit, as determined by the procedures specified in 40 CFR § 63.772(b)(1). Enter the code on the form.

| <u>Code</u> | <u>Description</u>  |
|-------------|---|
| 85-         | Less than 85,000 standard cubic meters per day                |
| 85+         | Greater than or equal to 85,000 standard cubic meters per day |

▼ **Continue Only if “Average Annual Flowrate” is “85+”.**

**AVERAGE BENZENE EMISSIONS:** Select one of the following options for the actual average emissions of benzene from the glycol dehydration unit process vent, as determined by the procedures specified in 40 CFR § 63.772(b)(2). Enter the code on the form.

| <u>Code</u> | <u>Description</u>                              |
|-------------|---|
| 90-         | Less than 0.90 megagram per year                |
| 90+         | Greater than or equal to 0.90 megagram per year |

▼ **Continue Only if “Average Benzene Emissions” is “90+”.**

**PROCESS VENT CONTROL:** Select one of the following options to indicate the method used to control emissions from the glycol dehydration unit process vent, in accordance with 40 CFR § 63.765. Enter the code on the form.

| <u>Code</u> | <u>Description</u>  |
|-------------|---|
| PNGL        | Process vent is connected to a process natural gas line [40 CFR § 63.765(c)(1)]   |
| CD-CVS      | Process vent is connected to a control device or a combination of control devices through a closed-vent system [40 CFR § 63.765(b)(1)(i)]   |
| B90         | Process vent is connected to a control device or a combination of control devices through a closed-vent system and the outlet benzene emissions from the control device(s) are reduced to a level less than 0.90 megagrams per year [40 CFR § 63.765(b)(1)(ii)] |
| MOD         | Total hazardous air pollutant (HAP) emissions to the atmosphere are reduced by 95% through process modifications alone ( <i>For SOP applications only</i> ) [40 CFR § 63.765(c)(2)]   |
| COMB        | Total HAP emissions to the atmosphere are reduced by 95% through a combination of process modifications and one or more control devices ( <i>For SOP applications only</i> )  |

▼ **Continue Only if “Process Vent Control” is “CD-CVS”, “B90”, or “COMB.”**

**BYPASS DEVICE:** Enter “YES” if the closed-vent system contains one or more bypass devices that could be used to divert all or a portion of the gases, vapors, or fumes from entering the control device. Otherwise, enter “NO.”

★ **Complete “Flow Indicator” only if “Bypass Device” is “YES.”**

**FLOW INDICATOR:** Enter “YES” if a flow indicator is installed at the inlet to the bypass device. Otherwise, enter “NO.”

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**Table 1b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)  
Subpart HH: National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas  
Production Facilities**

**EMISSION POINT ID NO.:** Enter the identification number (ID No.) for the glycol dehydration unit process vent (maximum 10 characters) as listed on Form OP-SUM.

**SOP/GOP INDEX NO.:** Site operating permit (SOP) applicants should indicate the SOP index number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). General operating permit (GOP) applicants should indicate the appropriate GOP index number in this column from the applicable GOP table (SSS-FF-XXX). Applicants should complete all applicable GOP attribute information before determining the GOP index number. For additional information relating to SOP and GOP index numbers please refer to the TCEQ guidance document entitled “Federal Operating Permit Application Guidance Document.”

**SEALED CLOSED VENT SYSTEM:** Enter “YES” if the closed-vent system contains joints, seams, or other connections that are permanently or semi-permanently sealed (e.g., a welded joint between two sections of hard piping or a bolted and gasketed ducting flange). Otherwise, enter “NO.”

**UNSAFE TO INSPECT:** Enter “YES” if any parts of the closed-vent system are designated as unsafe to inspect, as described in 40 CFR § 63.773(c)(5)(i) - (ii). Otherwise, enter “NO.”

**DIFFICULT TO INSPECT:** Enter “YES” if any parts of the closed-vent system are designated as difficult to inspect, as described in 40 CFR § 63.773(c)(6)(i) - (ii). Otherwise, enter “NO.”

**CONTROL DEVICE TYPE:** Select one of the following options for the type of control device. Enter the code on the form.

Enclosed Combustion Devices:

| <u>Code</u> | <u>Description</u>          |
|-------------|-----------------------------|
| THERM       | Thermal vapor incinerator   |
| CATA        | Catalytic vapor incinerator |
| BPH         | Boiler or process heater    |

Vapor Recovery Devices:

| <u>Code</u> | <u>Description</u>                      |
|-------------|---|
| COND        | Condenser                               |
| RCADS       | Regenerable carbon adsorption system    |
| NCADS       | Nonregenerable carbon adsorption system |

Other Control Device:

| <u>Code</u> | <u>Description</u> |
|-------------|--------------------|
| FLARE       | Flare              |

**CONTROL DEVICE ID NO.:** If applicable, enter the identification number for the control device to which tank emissions are routed (maximum 10 characters). This number should be consistent with the identification number listed on the Form OP-SUM (Individual Unit Summary).

▼ Do Not Continue if “Control Device Type” is “FLARE.”

★ Complete “Control Device Operation” only if “Process Vent Control” is “CD-CVS” and “Control Device Type” is “THERM”, “CATA”, or “BPH.”

CONTROL DEVICE OPERATION: Select one of the following options for the operation of the enclosed combustion device. Enter the code on the form.

| <u>Code</u> | <u>Description</u>   |
|-------------|--|
| TOC/HAP95   | Reduces the mass content of either total organic compounds (TOC) or total hazardous air pollutants (HAP) in the gases vented to the device by greater than or equal to 95.0 weight percent |
| TOC/HAP20   | Reduces the concentration of either TOC or total HAP in the exhaust gases at the outlet to the device to a level less than or equal to 20 ppmv on a dry basis corrected to 3% oxygen       |
| MRTT        | Operates at a minimum residence time of 0.5 seconds at a minimum temperature of 760 <sup>0</sup> C   |

PERFORMANCE TEST/DESIGN ANALYSIS EXEMPTION: Select one of the following options to indicate the specific control device performance test/design analysis exemption being used. Enter the code on the form.

For Boilers and Process Heaters:

| <u>Code</u> | <u>Description</u>   |
|-------------|--|
| 44+         | Design heat input capacity is greater than or equal to 44 megawatts (MW) [40 CFR § 63.772(e)(1)(ii)]   |
| FUEL        | Vent stream is introduced into the boiler or process heater with the primary fuel or is used as the primary fuel [40 CFR § 63.772(e)(1)(iii)]  |
| HAZ1        | Burning hazardous waste, a final permit under 40 CFR Part 270 has been issued and complying with the requirements of 40 CFR Part 266, subpart H; or burning hazardous waste and compliance has been certified with the interim status requirements of 40 CFR Part 266, Subpart H ( <i>For SOP applications only</i> ) [40 CFR § 63.772(e)(1)(iv)]                            |
| SAME        | A performance test, which uses the same methods specified in 40 CFR § 63.772, was conducted for another regulation promulgated by the EPA and either no process changes have been made since the test, or the owner or operator can demonstrate that the results of the performance test reliably demonstrate compliance despite process changes [40 CFR § 63.772(e)(1)(vi)] |
| NONE        | None of the above exemptions are being utilized  |

For Thermal Vapor Incinerators:

| <u>Code</u> | <u>Description</u>   |
|-------------|--|
| HAZ2        | Control device is a hazardous waste incinerator for which the owner or operator has been issued a final permit under 40 CFR Part 270 and is complying with the requirements of 40 CFR Part 264, subpart O, or has certified compliance with the interim status requirements of 40 CFR Part 265, subpart O ( <i>For SOP applications only</i> ) [40 CFR § 63.772(e)(1)(v)]    |
| SAME        | A performance test, which uses the same methods specified in 40 CFR § 63.772, was conducted for another regulation promulgated by the EPA and either no process changes have been made since the test, or the owner or operator can demonstrate that the results of the performance test reliably demonstrate compliance despite process changes [40 CFR § 63.772(e)(1)(vi)] |
| NONE        | None of the above exemptions are being utilized  |

For Catalytic Vapor Incinerators:

| <u>Code</u> | <u>Description</u>   |
|-------------|--|
| SAME        | A performance test, which uses the same methods specified in 40 CFR § 63.772, was conducted for another regulation promulgated by the EPA and either no process changes have been made since the test, or the owner or operator can demonstrate that the results of the performance test reliably demonstrate compliance despite process changes [40 CFR § 63.772(e)(1)(vi)] |
| NONE        | None of the above exemptions are being utilized  |

For Condensers and Carbon Adsorption Systems:

| <u>Code</u> | <u>Description</u>   |
|-------------|--|
| SAME        | A performance test, which uses the same methods specified in 40 CFR § 63.772, was conducted for another regulation promulgated by the EPA and either no process changes have been made since the test, or the owner or operator can demonstrate that the results of the performance test reliably demonstrate compliance despite process changes [40 CFR § 63.772(e)(1)(vi)] |
| NONE        | The exemption specified in 40 CFR § 63.772(e)(1)(vi) is not being utilized   |

★ **Complete “Performance Test or Design Analysis” only if “Performance Test/Design Analysis Exemption” is “NONE.”**

PERFORMANCE TEST OR DESIGN ANALYSIS: Select one of the following options to indicate the method used to demonstrate the control device achieves its appropriate performance requirements specified in 40 CFR § 63.771(d)(1) or (e)(3). Enter the code on the form.

For Boilers, Process Heaters, Vapor Incinerators, and Carbon Adsorption Systems:

| <u>Code</u> | <u>Description</u> |
|-------------|--------------------|
| PT          | Performance test   |
| DA          | Design analysis    |

For Condensers:

| <u>Code</u> | <u>Description</u>  |
|-------------|---|
| PT          | Performance test  |
| DA          | Design analysis   |
| MOD         | Using the procedures documented in the GRI report entitled, “Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions” as inputs for the model GRI-GLYCalc™ , Version 3.0 or higher, to determine condenser performance |



