

Statement of Basis of the Federal Operating Permit

Municipal Solid Waste Landfill

General Operating Permit

Permit Number 517

Standard Industrial Classification (SIC) Code:

4953 Refuse Systems

Operating Permit Basis of Determination

Description of the Project

The Texas Commission on Environmental Quality (TCEQ) executive director issues a revised and renewed Municipal Solid Waste Landfill (MSWL) General Operating Permit (GOP) Number 517. The MSWL GOP is issued by the TCEQ executive director under the requirements in Title 30 Texas Administrative Code (30 TAC) Chapter 122, Subchapter F (General Operating Permits). The GOP contains revisions resulting from new and amended federal and state rules, which will be applicable requirements under the Federal Operating Permit Program. The GOP also contains revisions to correct typographical errors and update language for administrative preferences. The specific revisions are described in the section, Description of the General Operating Permit Revisions. This GOP fulfills the obligation to renew the corresponding MSWL GOP Number 517 every five years as required by 30 TAC § 122.501 (General Operating Permits).

Description of the General Operating Permit Procedural Requirements

The procedural requirements for the issuance of a GOP by the executive director are in 30 TAC Chapter 122, Subchapter F (General Operating Permits). The requirements include a 30-day public comment period, a notice and comment hearing, an affected state review, and a 45-day United States Environmental Protection Agency (EPA) review. Once issued, the GOP will be subject to a 60-day public petition period, during which the public may petition EPA to object to the GOP.

On September 6, 2019, an opportunity for public comment on the draft GOP was published in the *Texas Register*, on the TCEQ Air Permits Division (APD) web page at www.tceq.texas.gov/permitting/air/nav/titlev_news.html, and in newspapers of the largest general circulation in the Austin, Dallas, and Houston metropolitan areas. The comment period was from September 6, 2019, through October 7, 2019, and offered the public an opportunity to review and submit comments on the draft GOP. A notice and comment hearing was held in Austin on October 7, 2019. Simultaneous with the public comment period, affected states (Arkansas, Colorado, Kansas, Louisiana, New Mexico, and Oklahoma) had the opportunity to comment on the draft GOP. Comments were received and those comments are addressed in the Response to Comments section of this document.

Following the public comment period, the EPA 45-day review period began on November 12, 2019, and ended on December 27, 2019. During this time, the EPA had the opportunity to comment on and object to the proposed GOP issuance. No EPA objections or comments were received.

From the date of issuance, February 24, 2020, the GOP is subject to public petition for 60 days, as specified in 30 TAC § 122.360 (Public Petition). Any person affected by a decision of the executive director to issue the GOP may petition the EPA to make an objection. Petitions shall be based only on objections to the GOP that are raised with reasonable specificity during the public comment period, unless the petitioner demonstrates in the petition to the EPA that it was not possible to have raised the objections within the public comment period, or that the grounds for the objection arose after the public comment period. The petition shall identify all objections. A copy of the petition shall be provided to the executive director by the petitioner. Petitions must be filed with the EPA on or before April 24, 2020. After receiving the petition, the EPA may object to the issuance of the GOP only if it is not in compliance with the applicable requirements or the requirements of 30 TAC Chapter 122 (Federal Operating Permits Program). The executive director shall have 90 days from the receipt of an EPA objection to resolve any objection and, if necessary, terminate or revise the GOP.

Applications for an authorization to operate (ATO) under a GOP are reviewed by the executive director to ensure that the site qualifies for the GOP. Individual GOP applications are not subject to public notice, affected state review, EPA review, and public petition requirements, because these procedural requirements occur during the development of the GOPs by the executive director. After the application review process is complete, the executive director approves ATOs under a GOP without further public notice.

Description of the Facility

TCEQ issues GOP Number 517 for use by Title V major and minor source landfills engaged in the collection and disposal of nonhazardous waste. Minor source landfills which are subject to Title 40 Code of Federal Regulation (40 CFR) Part 60, Subpart WWW (Standards of Performance for Municipal Solid Waste Landfills); 40 CFR Part 60, Subpart XXX (Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification After July 17, 2014); 40 CFR Part 63, Subpart AAAA (National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills), or 30 TAC Chapter 113, Subchapter D, Division 1 (Municipal Solid Waste Landfills) are required to be permitted under a Title V permit and may apply to operate under GOP Number 517. The 40 CFR Part 60, Subpart XXX, was added due to the EPA promulgating new regulations for standards of performance for municipal solid waste landfills that commenced construction, reconstruction, or modification after July 17, 2014; and municipal solid waste landfills operating under this GOP are subject to these regulations.

For thresholds by which sources are classified as major, see our Texas State Implementation Plan web page at www.tceq.texas.gov/airquality/sip. Different thresholds apply to different sites, based on the attainment status of the county in which the site is located.

Description of the General Operating Permit Revisions

The GOP includes updates to punctuation, acronyms, numbering, title references, and typographical errors throughout the documents and may not be specifically listed.

Section (b):

- 517(b)(8)(D)(ii), 30 TAC §106.103 (Air Conditioning and Ventilation Systems), was amended and removed from the list as a PBR that must be complied with under this GOP. This PBR was repealed and the emissions covered under this PBR were added to the de minimis list. Emissions covered under the 30 TAC § 116.119 (De Minimis Facilities or Sources) are not historically specified in this GOP; therefore, air conditioning and ventilation systems are not referenced in this GOP.
- 517(b)(8)(F) and subsequent clauses were moved to 517(b)(8)(G), and current 517(b)(8)(G) and subsequent clauses were re-lettered to 517(b)(8)(F) and subsequent clauses. This is to create consistency and clarity in formatting in the GOP for PBRs and standard permits.
- 517(b)(8)(G)(iii), 30 TAC § 116.621 (Municipal Solid Waste Landfill), was removed from the list of standard permits that must be complied with under this GOP. This section was replaced by the standard permit in 30 TAC Chapter 330, Subchapter U (Standard Air Permits for Municipal Solid Waste Landfill Facilities and Transfer Stations), that authorizes air emissions from landfills and landfill support activities. The reference to 30 TAC Chapter 330, Subchapter U, is listed in 517(b)(8)(G)(viii), new 517(b)(8)(F)(vi), and therefore, does not need to be added to the GOP.
- 517(b)(8)(G)(v) and (vi), new (b)(8)(F)(iv), was amended to "Air Quality Standard Permit for Electric Generating Units" to clarify that the East Texas region and the West Texas region are not separate standard permits. The Air Quality Standard Permit for Electric Generating Units includes requirements specific to the East Texas region and West Texas region that are detailed in the Air Quality Standard Permit for Electric Generating Units.
- 517(b)(9)(A)(iv) was amended to reference periodic monitoring (PM) rather than compliance assurance monitoring (CAM). Stationary vents subject to the opacity emission limits in 30 TAC Chapter 111, Subchapter A, Visible Emissions and Particulate Matter, are not subject to CAM; however, stationary vents subject to the opacity emission limits in 30 TAC Chapter 111, Subchapter A, are subject to PM. 517(b)(9)(A)(iv) was also amended to clarify that this regulation applies to individual vents identified in the application.
- 517(b)(9)(J)(vi) was amended to include the reference to 30 TAC § 111.217 (Requirements for Certified and Insured Prescribed Burn Managers). This section was promulgated in 2017 to include prescribed burning when conducted under the direction of a Certified and Insured Prescribed Burn Manager who are certified by the Prescribed Burning Board of the Texas Department of Agriculture.
- 517(b)(10)(D) was amended to remove the reference to the publication of notice in the *Texas Register*

of the State Plan for compliance requirements. The reference was amended to accurately refer permit holders to the compliance requirements in 30 TAC § 113.2301 (When must I comply?).

- 517(b)(12)(A)(iv) was amended to update the reference from 30 TAC § 115.225(1) - (4) (Testing Requirements) to 30 TAC § 115.225(1) - (3). The subsection in 30 TAC § 115.225 (Testing Requirements) was amended to update current test procedures and require all affected gasoline dispensing facilities be subject to requirements of 40 CFR § 63.11120 (What testing and monitoring requirements must I meet?).
- 517(b)(12)(C)(iv), (b)(12)(E)(iv), and (b)(12)(F)(iv) were amended to update the reference from 30 TAC § 115.226(2)(C) (Recordkeeping Requirements) to 30 TAC § 115.226(2)(B). The rule in 30 TAC § 115.226(C) was amended to combine subparagraphs (B) and (C) to reflect that the recordkeeping requirements would become uniform in the counties listed as the Stage II vapor control requirements were repealed. The requirement to keep the records for gasoline throughput for each calendar month was updated to clarify that the records shall be kept for the previous 24 months.
- 517(b)(18)(M) was amended to update the reference for 30 TAC § 115.546(a)(4) (Recordkeeping and Notification Requirements) from "for recordkeeping of testing of control devices used to comply with 30 TAC § 115.542(a)(1)" to "for recordkeeping of control efficiency demonstration required in § 115.544(c), and the results of any testing conducted in accordance with the provisions specified in § 115.545." This reference was updated to accurately reflect the paragraph in 30 TAC 115.546(a)(4) that was amended to clarify what information the commission expects to be included in the records of any testing conducted in accordance with the approved test methods in § 115.545.
- 517(b)(26)(C) was amended to update the reference from 30 TAC § 117.2045(g)(1) (Recordkeeping and Reporting Requirements) to 30 TAC § 117.2045(c). The rule, 30 TAC § 117.2045, was amended to specify operation record requirements.
- 517(b)(33) was amended to remove the references to 40 CFR Part 63, Subpart JJJJJJ (National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources) and 30 TAC §113.1435 (Industrial, Commercial, and Institutional Boilers Area Sources (40 Code of Federal Regulations Part 63, Subpart JJJJJJ)). The standards in 40 CFR Part 63, Subpart JJJJJJ, do not apply to gas-fired units. This term was amended because the requirements in 40 CFR 63, Subpart JJJJJJ are not applicable to this GOP because boilers in GOP(a)(4) are restricted to burn only natural gas or landfill gas.
- 517(b)(37)(F)(iv) was amended for consistency when using "relating to" for applicable references.
- 517(b)(39)(E) was amended to remove 30 TAC § 101.358 (Emission Monitoring and Compliance Demonstration) because this section was repealed. The provisions previously in 30 TAC § 101.358 were adopted in 30 TAC § 101.354 (Allowance Deductions) which is referenced in 517(b)(39)(C) and therefore, is not added to the list of requirements.
- 517(b)(41)(D) was amended to remove the reference to 30 TAC § 101.303(g) (Emission Reduction Credit Generation and Certification) and update the reference to 30 TAC § 101.302(i) (General Provisions). The language in 30 TAC § 101.303(g) was updated and moved to 30 TAC § 101.302(i).

Section (c) of this GOP contains permit tables that provide a codification of applicable requirements, including regulatory monitoring, testing, recordkeeping, and reporting requirements, for units covered by the GOP.

Additional information relating to permit tables may be found in the APD guidance document "How to Read a General Operating Permit" located at

www.tceq.texas.gov/assets/public/permitting/air/Title_V/General/howto_gops.pdf.

The applicable requirements codified in section (c) of the draft GOP Number 517 are revised due to newly promulgated or amended regulations, or corrections.

Permit holders operating under an index number in a permit table that is revised may need to update their applications if applicability determinations and the determination of basis affecting the emission units change.

The tables are updated for consistency with the existing decision support system.

The following permit titles were amended to more accurately reflect titles references:

- 517(c)(5), 517(c)(10), 517(c)(14), 517(c)(17), 517(c)(22), 517(c)(23), 517(c)(26), 517(c)(27), 517(c)(28), 517(c)(35), 517(c)(36), 517(c)(49), and 517(c)(50) were amended to accurately include Brazoria as an applicable area. The amendment to the titles is "Houston/Galveston/Brazoria" rather than "Houston/Galveston."
- 517(c)(11) is "Stationary Vents affected by 30 TAC Chapter 115, Subchapter B, Division 2 and located in Nueces or Victoria County" rather than "Stationary Vents affected by 30 TAC Chapter 115, Subchapter B, Division 2 and located in Gregg, Nueces, or Victoria County."
- 517(c)(28) is "Surface Coating Processes affected by 30 TAC Chapter 115, Subchapter E, Division 2 (Surface Coating Processes) and located in Gregg, Nueces, or Victoria County" rather than "Surface Coating Processes affected by 30 TAC Chapter 115, Subchapter E, Division 2 and located in Gregg, Nueces, or Victoria County."
- 517(c)(45) is "Boilers affected by 40 CFR Part 63, Subpart DDDDD" rather than "Boilers and Process Heaters affected by 40 CFR Part 63, Subpart DDDDD."
- 517(c)(53) is "Stationary Spark Ignition Internal Combustion Engines affected by 40 CFR Part 60, Subpart JJJJ" rather than "Compression Ignited Internal Combustion Engines affected by 40 CFR Part 60, Subpart IIII."
- 517(c)(54) is "Stationary Compression Ignition Internal Combustion Engines affected by 40 CFR Part 60, Subpart IIII" rather than "Compression Ignited Internal Combustion Engines affected by 40 CFR Part 60, Subpart JJJJ."
- 517(c)(57) is "Boilers and Process Heaters affected by 40 CFR Part 63, Subpart JJJJJJ" rather than "Boilers affected by 40 CFR Part 63, Subpart JJJJJJ."
- 517(c)(59) is "Surface Coating Processes affected by 30 TAC Chapter 115, Subchapter E, Division 5 (Control Requirement for Surface Coating Processes) and located in the Houston/Galveston/Brazoria and Dallas/Fort Worth" rather than "Surface Coating Processes affected by 30 TAC Chapter 115, Subchapter E, Division 2 (Surface Coating Processes) and located in the Houston/Galveston and Dallas/Fort Worth."

No previously existing permit tables were removed from the GOP.

The following new permit tables were added in the GOP:

- 517(c)(61) - Nonmetallic Mineral Processing Plants affected by 40 CFR Part 60, Subpart OOO (Standards of Performance for Nonmetallic Mineral Processing Plants). Municipal solid waste sites with portable facilities may be potentially subject to this subpart. Therefore, this table is added to the GOP.
- 517(c)(62) - Process heaters affected by 40 CFR Part 63, Subpart DDDDD (National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters). Boilers and process heaters are both included in table 517(c)(45). The unit types, boilers and process heaters, are on different OP-UA forms. Therefore, boilers remain on table 517(c)(45) and a new table 517(c)(62) for process heaters was added.
- 517(c)(63) - Municipal Solid Waste Landfills affected by 40 CFR Part 60, Subpart XXX (Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification After July 17, 2014). The EPA promulgated, 40 CFR Part 60, Subpart XXX, which is applicable to municipal solid waste sites. Therefore, table 517(c)(63) was added.

The following permit tables, found in Section (c) of GOP 517, were updated in response to public comment, and a more detailed explanation is included in the Response to Comments section:

- Table of contents, hyperlinks; Table 23: § 115.C.1 (Load-Unload); Table 24: § 115.C.1 (Load-Unload); Table 25: § 115.E.1 (Degreasing); Table 45: MACT DDDDD (Boilers); Table 52: § 117.B.4 (D Engines); Table 58: § 115.E.6 (Indust. Solvent); Table 59: §115.E.5 (Coating); and Table 63: NSPS XXX Landfills.

Periodic Monitoring

Section (f) includes the periodic monitoring applicability criteria and additional monitoring requirements.

Section (g) contains the Periodic Monitoring (PM) Option Tables. The executive director has made an effort to include all possible periodic monitoring options from the "Periodic Monitoring Guidance Document" appropriate for an MSWL site. The guidance is available on the website:

www.tceq.texas.gov/permitting/air/guidance/titlev/tv_fop_guidance.html.

The following changes were made to PM Option Tables (g):

- PM options PMG-LF-V-001, PMG-LF-V-020, PMG-LF-V-049, PMG-LF-V-050, and PMG-LF-V-014 were amended to correct the references from "40 CFR Part 60, Appendix A, Method 21" to "40 CFR Part 60, Appendix A-7, Method 21." When listed, the appropriate sections of Test Method 21 (Sections 3.0, 6.0, 8.0, 9.0, and 10.0) were amended to reflect the current version.
- PM option PM-V-053 was amended to PM option PMG-LF-V-062 to make it consistent with the PM numbering scheme in the GOP.
- For PM options PMG-LF-V-062 (previous PM-V-053) and PMG-LF-V-006 in the Periodic Monitoring Requirement the word "should" was amended and replaced with "shall." This amendment makes the requirements consistent with enforceable permit language as the word "should" suggests that the requirement is optional.
- For PM options PMG-LF-V-005, PMG-LF-V-043, PMG-LF-V-045, PMG-LF-V-047, PMG-LF-V-060, PMG-LF-N-035, PMG-LF-N-037, PMG-LF-N-039, PMG-LF-N-041, PMG-LF-N-044, PMG-LF-N-046, PMG-LF-N-048, and PMG-LF-N-050 in the Indicator Monitored column were amended to include ", and:". This is to clarify that the monitoring option is paired with the immediately following option. For example, monitoring fuel consumption once per week (PMG-LF-N-035) and monitoring NO_x concentration once every two years (PMG-LF-N-036) are both required for providing a reasonable assurance of compliance for an emission unit (such as an engine) using a catalytic converter for NO_x control.
- The periodic monitoring text for options PMG-LF-N-036 and PMG-LF-N-038 was amended to correct the stack testing citation from §117.211(e) to 30 TAC §117.8000(b) - (d) (Stack Testing Requirements). When 30 TAC § 117.211(e) was repealed, the testing methods were transferred to 30 TAC § 117.8000(b) - (d).
- New periodic monitoring option PMG-LF-S-001 was added for boilers and heaters authorized by 30 TAC § 106.181 (Used-Oil Combustion Units) burning used oil that are subject to SO₂ emission limits in 30 TAC Chapter 112 (Control of Air Pollution from Sulfur Compounds). Previously, the GOP did not include SO₂ monitoring options for periodic monitoring requirements as indicated in GOP permit table 517(c)(30) index numbers 517-30-001 through 517-30-004. This monitoring option requires records to be maintained showing that only authorized fuels, as specified in 30 TAC § 106.181, are being burned in the unit and emission calculations to provide an assurance that the SO₂ emission limit in 30 TAC Chapter 112 is not exceeded.
- New periodic monitoring option PMG-LF-S-002 was added for other liquid fired units that are subject to SO₂ emission limits in 30 TAC Chapter 112. Previously, the GOP did not include SO₂ monitoring options for periodic monitoring requirements as indicated in GOP permit table 517(c)(30) index numbers 517-30-001 through 517-30-004. This option is added for any miscellaneous liquid fired unit that may not be covered under 30 TAC § 106.181 and utilizes the same requirements from the periodic monitoring guidance document for Site Operating Permits (SOPs). The monitoring requirements requires quarterly fuel sampling for recording the sulfur content of the fuel which can be used and emission calculations to establish that the SO₂ emission limit in 30 TAC Chapter 112 is not exceeded.
- The table title for PM option PMG-LF-S-002 was amended to "Emission Units firing liquid fuel" for clarification on the specific types of emission units applicable to this option. Option PMG-LF-S-002 was designed for liquid fuel-fired heaters subject to SO₂ emission limits in 30 TAC Chapter 112, Control of

Sulfur Compounds, that require periodic monitoring as indicated in GOP Index Numbers 517-30-001, 517-30-002, 517-30-003, and 517-30-004 in the GOP 517 requirement tables.

All index numbers and their correlating applicable requirements in the GOP tables have been evaluated to determine if they provide sufficient periodic monitoring. Index numbers determined to have insufficient periodic monitoring were identified by placing the words "Periodic Monitoring" in the monitoring and testing column of its set of applicable requirements.

It is important to note that the option numbers listed may not be in sequential order. This is because these monitoring options are those included in the "Periodic Monitoring Guidance Document" and not all of those were necessary in this GOP. Permit holders must review the applications for each of their sites and determine if an application for additional periodic monitoring is required. The following permit tables contain index numbers, which will require additional periodic monitoring:

- 517(c)(1) - Stationary Gas Turbines affected by 40 CFR Part 60, Subpart GG (Standards of Performance for Stationary Gas Turbines).
- 517(c)(2) - Storage Vessels affected by 40 CFR Part 60, Subpart K (Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978).
- 517(c)(3) - Storage Vessels affected by 40 CFR Part 60, Subpart Ka (Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984).
- 517(c)(4) - Storage Vessels affected by 40 CFR Part 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984).
- 517(c)(5) - Storage Vessels affected by 30 TAC Chapter 115, Subchapter B, Division 1 (Storage of Volatile Organic Compounds) and located in Houston/Galveston/Brazoria, Beaumont-Port Arthur ozone nonattainment area, Dallas/Fort Worth, or El Paso area.
- 517(c)(6) - Storage Vessels affected by 30 TAC Chapter 115, Subchapter B, Division 1 and located in Gregg, Nueces, or Victoria County.
- 517(c)(7) - Storage Vessels affected by 30 TAC Chapter 115, Subchapter B, Division 1 and located in Aransas, Bexar, Calhoun, Matagorda, San Patricio, or Travis County.
- 517(c)(10) - Stationary Vents affected by 30 TAC Chapter 115, Subchapter B, Division 2 (Vent Gas Control) and located in the Houston/Galveston/Brazoria, Beaumont/Port Arthur, Dallas/Fort Worth ozone nonattainment area, or the El Paso area.
- 517(c)(11) - Stationary Vents affected by 30 TAC Chapter 115, Subchapter B, Division 2 and located in Nueces or Victoria County.
- 517(c)(12) - Stationary Vents affected by 30 TAC Chapter 115, Subchapter B, Division 2 and located in Aransas, Bexar, Calhoun, Matagorda, San Patricio, or Travis County.
- 517(c)(13) - Incinerators affected by 40 CFR Part 60, Subpart E (Standards of Performance for Incinerators).
- 517(c)(14) - VOC Water Separators affected by 30 TAC Chapter 115, Subchapter B, Division 3 (Water Separation) in the Houston/Galveston/Brazoria, Beaumont/Port Arthur, Dallas/Fort Worth ozone nonattainment area, or the El Paso area.
- 517(c)(15) - VOC Water Separators affected by 30 TAC Chapter 115, Subchapter B, Division 3 and located in Gregg, Nueces, or Victoria County.
- 517(c)(16) - VOC Water Separators affected by 30 TAC Chapter 115, Subchapter B, Division 3 and located in Aransas, Bexar, Calhoun, Matagorda, San Patricio, or Travis County.
- 517(c)(17) - Cold Cleaning Degreasing Operations affected by 30 TAC Chapter 115, Subchapter E,

Division 1 (Degreasing Processes) in the Houston/Galveston/Brazoria, Beaumont/Port Arthur, Dallas/Fort Worth ozone nonattainment area or the El Paso area and in Bexar, Comal, Guadalupe, Wilson, Bastrop, Caldwell, Hays, Travis, and Williamson Counties.

- 517(c)(19) - Municipal Solid Waste Landfills affected by 40 CFR 61, Subpart M (National Emission Standards for Asbestos).
- 517(c)(25) - Cold Cleaning Degreasing Operations affected by 30 TAC Chapter 115, Subchapter E, Division 1 and located in Gregg, Nueces, or Victoria County.
- 517(c)(30) - Liquid Fuel-Fired Heaters affected by 30 TAC Chapter 112 (Control of Air Pollution from Sulfur Compounds).
- 517(c)(56) - Stationary Vents affected by 30 TAC Chapter 111, Subchapter A, Division 1 (Visible Emissions).

Compliance Assurance Monitoring

Section (d) includes compliance assurance monitoring (CAM) applicability criteria and section (e) contains the CAM option tables. The executive director has made an effort to include all possible pre-approved CAM options from the "Compliance Assurance Monitoring Guidance Document" appropriate for a MSWL site. The guidance is available on the website: www.tceq.texas.gov/permitting/air/guidance/titlev/tv_fop_guidance.html.

The following changes were made to the Compliance Assurance Monitoring Option Tables (e):

- CAM options CMG-LF-VO-001, CMG-LF-CA-009, and CMG-LF-CA-012 were amended to correct the references from "40 CFR Part 60, Appendix A, Method 21" to "40 CFR Part 60, Appendix A-7, Method 21." When listed, the appropriate sections of Test Method 21 (Sections 3.0, 6.0, 8.0, 9.0, and 10.0) were also amended to reflect the current version.
- For CAM options CMG-LF-FL-004, CMG-LF-FL-006, CMG-LF-TI-001, CMG-LF-TI-002, CMG-LF-VC-001, CMG-LF-VC-002, CMG-LF-CI-001, CMG-LF-CI-002, CMG-LF-SG-001, CMG-LF-SG-002, CMG-LF-RC-001, CMG-LF-RC-002, CMG-LF-SC-001, CMG-LF-SC-003, CMG-LF-SC-005, CMG-LF-SC-007, CMG-LF-SC-009, CMG-LF-SC-011, CMG-LF-SC-026, CMG-LF-SC-028, CMG-LF-SN-01, CMG-LF-SN-03, CMG-LF-SN-05, CMG-LF-SN-07, CMG-LF-SN-09, CMG-LF-SN-11, CMG-LF-CC-001, CMG-LF-CC-003, CMG-LF-CC-005, CMG-LF-CC-007, CMG-LF-CC-009, CMG-LF-CC-011, CMG-LF-CC-013, CMG-LF-CC-015, CMG-LF-CC-017, CMG-LF-CC-019, CMG-LF-CC-021, CMG-LF-CC-023, CMG-LF-CC-025, CMG-LF-CC-026, CMG-LF-CC-027, CMG-LF-CC-028, CMG-LF-CC-042, CMG-LF-CC-044, CMG-LF-CC-045, CMG-LF-CC-047, CMG-LF-CC-049, CMG-LF-CC-051, CMG-LF-CC-053, CMG-LF-CC-055, CMG-LF-CC-057, CMG-LF-CC-059, CMG-LF-CC-061, and CMG-LF-CC-063 in the Monitoring Specifications and Procedures the word "should" was amended and replaced with "shall." This amendment is to make the requirements consistent with enforceable permit language as the word "should" suggests that the requirement is optional.
- For CAM options CMG-LF-FL-003, CMG-LF-FL-005, CMG-LF-CA-001, CMG-LF-CA-003, CMG-LF-CA-005, CMG-LF-CA-007, CMG-LF-SC-001, CMG-LF-SC-003, CMG-LF-SC-005, CMG-LF-SC-007, CMG-LF-SC-009, CMG-LF-SC-011, CMG-LF-SC-013, CMG-LF-SC-015, CMG-LF-SC-017, CMG-LF-SC-019, CMG-LF-SC-021, CMG-LF-SC-023, CMG-LF-SC-025, CMG-LF-SC-027, CMG-LF-SN-01, CMG-LF-SN-03, CMG-LF-SN-05, CMG-LF-SN-07, CMG-LF-SN-09, CMG-LF-SN-11, CMG-LF-SI-001, CMG-LF-SI-003, CMG-LF-CC-001, CMG-LF-CC-003, CMG-LF-CC-005, CMG-LF-CC-007, CMG-LF-CC-009, CMG-LF-CC-011, CMG-LF-CC-013, CMG-LF-CC-015, CMG-LF-CC-017, CMG-LF-CC-019, CMG-LF-CC-021, CMG-LF-CC-023, CMG-LF-CC-025, CMG-LF-CC-027, CMG-LF-CC-029, CMG-LF-CC-031, CMG-LF-CC-033, CMG-LF-CC-035, CMG-LF-CC-037, CMG-LF-CC-039, CMG-LF-CC-041, CMG-LF-CC-043, CMG-LF-CC-045, CMG-LF-CC-047, CMG-LF-CC-049, CMG-LF-CC-051, CMG-LF-CC-053, CMG-LF-CC-055, CMG-LF-CC-057, CMG-LF-CC-059, CMG-LF-CC-061, CMG-LF-CC-063, CMG-LF-CC-065, CMG-LF-CC-067, CMG-LF-CC-069, CMG-LF-CC-071, CMG-LF-CC-073, and CMG-LF-CC-075 the Indicator Monitored column was amended to include ", and:". This is to clarify that the monitoring option is paired with the immediately following option. For example, monitoring inlet gas temperature once per day (CMG-LF-CC-001) and monitoring NO_x concentration once every two years

(CMG-LF-CC-002) are both required for providing a reasonable assurance of compliance for an emission unit (such as an engine) using a catalytic converter for NO_x control.

- CAM option CMG-LF-SC-027 was amended to specify that the indicator monitored is Catalytic Bed Pressure Drop rather than only Catalytic. This amendment adds clarity and is apparent from the monitoring text that this applies to pressure drop across the catalyst bed and is consistent with other option in the CMG-LF-SC series.

Origin of Monitoring Options

The CAM and periodic monitoring options developed by the executive director are based on federal and state regulations, historical New Source Review (NSR) permits, and EPA guidance and training.

Federal Regulatory Applicability Determinations

The following chart summarizes the applicability of the principal air pollution regulatory programs that may apply to areas permitted under GOP Number 517.

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	No
Nonattainment NSR	No
State NSR	Yes
40 CFR Part 60	Yes
40 CFR Part 61 ¹	Yes
40 CFR Part 63	Yes
Title IV	No
Title V	Yes
Title VI	Yes

The permit tables include the applicability determinations for the emission units based on the index number(s) and all relevant units' attribute information. Each combination of unit attributes information 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 (UA) Forms may be viewed at www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html.

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. 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 (APD) has developed the GOP permit tables for determining applicability of state and federal regulations based on the unit attribute information.

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. Each permit table can be interpreted as a series of paths for determining

¹ National Emission Standards for Hazardous Air Pollutants

applicable regulatory requirements and monitoring, reporting, recordkeeping, and testing requirements. Starting on the left side of a permit table, proceed down the first column to the attribute describing the unit. After finding the correct attribute, move directly to the right and into the next attribute column. This move will provide a subset of attributes based on the previous attribute. Choose the correct attribute from this subset and, again, move directly to the right, into the next attribute column, and choose the next correct attribute subset.

Continue this process until the index number and corresponding applicable requirements, unique to the attribute path, are reached. The index number will be entered on the UA form next to the corresponding unit identification number.

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.

New Source Review Requirements

NSR authorizations are incorporated by reference in the GOP application and are enforceable under it.

The GOP Number 517 only covers sites containing emission units authorized by Permits by Rule (PBR) and Standard Permits and codified into this GOP. The PBR codified into the GOP Number 517 include:

- 30 TAC § 106.102 (Comfort Heating);
- 30 TAC § 106.142 (Rock Crushers);
- 30 TAC § 106.148 (Material Unloading);
- 30 TAC § 106.181 (Used-Oil Combustion Units);
- 30 TAC § 106.183 (Boilers, Heaters, and Other Combustion Devices);
- 30 TAC § 106.227 (Soldering, Brazing, Welding);
- 30 TAC § 106.244 (Ovens, Barbecue Pits, and Cookers);
- 30 TAC § 106.261 (Facilities (Emission Limitations));
- 30 TAC § 106.262 (Facilities (Emission and Distance Limitations));
- 30 TAC § 106.263 (Routine Maintenance, Start-up and Shutdown of Facilities, and Temporary Maintenance Facilities);
- 30 TAC § 106.264 (Replacements of Facilities);
- 30 TAC § 106.265 (Hand-held and Manually Operated Machines);
- 30 TAC § 106.266 (Vacuum Cleaning Systems);
- 30 TAC § 106.411 (Steam or Dry Cleaning Equipment);
- 30 TAC § 106.412 (Fuel Dispensing);
- 30 TAC § 106.433 (Surface Coat Facility);
- 30 TAC § 106.436 (Auto Body Refinishing Facility);
- 30 TAC § 106.451 (Wet Blast Cleaning)
- 30 TAC § 106.452 (Dry Abrasive Cleaning);
- 30 TAC § 106.454 (Degreasing Units);
- 30 TAC § 106.472 (Organic and Inorganic Liquid Loading and Unloading);

- 30 TAC § 106.473 (Organic Liquid Loading and Unloading);
- 30 TAC § 106.476 (Pressurized Tanks or Tanks Vented to Control);
- 30 TAC § 106.478 (Storage Tank and Change of Service);
- 30 TAC § 106.491 (Dual-Chamber Incinerators);
- 30 TAC § 106.492 (Flares);
- 30 TAC § 106.496 (Air Curtain Incinerators);
- 30 TAC § 106.511 (Portable and Emergency Engines and Turbines);
- 30 TAC § 106.512 (Stationary Engines and Turbines);
- 30 TAC § 106.533 (Remediation); and
- 30 TAC § 106.534 (Municipal Solid Waste Landfills and Transfer Stations).

The standard permits codified into the GOP Number 517 include:

- Air Quality Standard Permit for Air Quality Pollution Control Projects;
- 30 TAC § 116.617 (State Pollution Control Project Standard Permit);
- Air Quality Standard Permit for Temporary Rock and Concrete Crushers;
- Air Quality Standard Permit for Electric Generating Units;
- Air Quality Standard Permit for Boilers; and
- 30 TAC Chapter 330, Subchapter U (Standard Air Permits for Municipal Solid Waste Landfill Facilities and Transfer Stations).

Compliance Status

All owners and operators operating under a GOP must report all units in compliance at the time of initial issuance of the authorization to operate (ATO) and at a renewal of the ATO. After an initial ATO is issued, the owner or operator must certify compliance with the terms and conditions of the permit for at least every 12-month period following the initial issuance of the ATO. Annual compliance certifications should be submitted to the executive director and the EPA administrator no later than 30 days after the end of the certification period.

Additionally, the owner or operator shall report, in writing, all instances of deviations, the probable cause of the deviations, and any corrective actions or preventative measures taken for the deviations for each emission unit covered by a GOP. A deviation report should be submitted for at least each six-month period after permit issuance or at the frequency required by an applicable requirement, which requires more frequent reporting. However, no report is required if no deviations occurred over the six-month reporting period. The deviation reports should be submitted no later than 30 days after the end of each reporting period. Reports submitted under 30 TAC § 101.201 (Emissions Event Reporting and Recordkeeping Requirements), and 30 TAC § 101.211 (Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements) do not substitute for deviation reports. Annual compliance certification and deviation reporting forms were developed and are maintained by the TCEQ Office of Compliance and Enforcement. These forms are available at www.tceq.texas.gov/cqi-bin/comm_exec/forms.pl

Owners or operators needing information regarding annual compliance certifications or deviation reports should contact the TCEQ Office of Compliance and Enforcement, Program Support Section, at (512) 239-0400 or the Small Business and Local Government Assistance program at 1-800-447-2827.

Available Unit Attribute Forms

The following is a list of unit attribute forms applicable to GOP Number 517 applications:

- 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-UA11 - Stationary Turbine Attributes
- OP-UA14 - Water Separator Attributes
- OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes
- OP-UA16 - Solvent Degreasing Machine Attributes
- OP-UA18 - Surface Coating Operations Attributes
- OP-UA35 - Incinerator Attributes
- OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes

Hearing and Commenters

The draft GOP was subject to a 30-day comment period from September 6, 2019 through October 7, 2019, during which time, any person was eligible to submit written comments on the draft GOP. A notice was published on September 6, 2019 and a hearing was held in Austin on October 7, 2019, at 2:00 p.m. in 201S, Building E of the TCEQ offices, located at 12100 Park 35 Circle. No attendees appeared at the hearing. Written public comments were received from Weaver Consultants Group, LLC during the public comment period and are responded to in the Response to Comments section.

Simultaneous with the public comment period, affected states (Arkansas, Colorado, Kansas, Louisiana, New Mexico, and Oklahoma) had the opportunity to comment on the draft GOP. No comments were received from affected states.

Following the public comment period, the GOP was subject to the EPA 45-day review period beginning on November 12, 2019, and ending on December 27, 2019. No EPA objections or comments were received.

Response to Comments

The Texas Commission on Environmental Quality (TCEQ) received the following written comments from Weaver Consultants Group, LLC during the public comment period.

Comment 1

The commenter stated that in the Statement of Basis, in the Periodic Monitoring Option Tables (g), and in the Compliance Assurance Monitoring Option Tables (e), the first bullet amending Method 21 to Appendix A-7, omits that Section 6.0 is also listed in the tables.

Response 1

The Executive Director (ED) agrees, and added Section 6.0 (relating to Equipment and Supplies which includes the VOC monitor instrument specifications) in reference to Test Method 21 in the Statement of Basis under the Periodic Monitoring (PM) section and under the Compliance Assurance Monitoring (CAM) section to be consistent with the changes that were made in the PM and CAM Option Tables. The Statement of Basis was updated as follows:

- PM options PMG-LF-V-001, PMG-LF-V-020, PMG-LF-V-049, PMG-LF-V-050, and PMG-LF-V-014 were amended to correct the references from "40 CFR Part 60, Appendix A, Method 21" to "40 CFR Part 60, Appendix A-7, Method 21." When listed, the appropriate sections of Test Method 21 (Sections 3.0, 6.0, 8.0, 9.0, and 10.0) were also amended to reflect the current version.
- CAM options CMG-LF-VO-001, CMG-LF-CA-009, and CMG-LF-CA-012 were amended to correct the references from "40 CFR Part 60, Appendix A, Method 21" to "40 CFR Part 60, Appendix A-7,

Method 21." When listed, the appropriate sections of Test Method 21 (Sections 3.0, 6.0, 8.0, 9.0, and 10.0) were also amended to reflect the current version.

Comment 2

The commenter stated that in the Statement of Basis, in the Periodic Monitoring Option Tables (g) in the fourth bullet "PM-LF-V-005" should be corrected to say "PMG-LF-V-005." The commenter also stated that in the CAM Option Tables (e), the second bullet "CMG-FL-SC-001" should be corrected to say "CMG-LF-SC-001."

Response 2

The ED agrees and corrected the typographical errors in the Statement of Basis referring to PM option PMG-LF-V-005 and CAM option CMG-LF-SC-001. The Statement of Basis was updated as follows:

- For PM options PMG-LF-V-005, PMG-LF-V-043, PMG-LF-V-045, PMG-LF-V-047, PMG-LF-V-060, PMG-LF-N-035, PMG-LF-N-037, PMG-LF-N-039, PMG-LF-N-041, PMG-LF-N-044, PMG-LF-N-046, PMG-LF-N-048, and PMG-LF-N-050 in the Indicator Monitored column were amended to include ", and:". This is to clarify that the monitoring option is paired with the immediately following option. For example, monitoring fuel consumption once per week (PMG-LF-N-035) and monitoring NOX concentration once every two years (PMG-LF-N-036) are both required for providing a reasonable assurance of compliance for an emission unit (such as an engine) using a catalytic converter for NOX control.
- For CAM options CMG-LF-FL-003, CMG-LF-FL-005, CMG-LF-CA-001, CMG-LF-CA-003, CMG-LF-CA-005, CMG-LF-CA-007, CMG-LF-SC-001, CMG-LF-SC-003, CMG-LF-SC-005, CMG-LF-SC-007, CMG-LF-SC-009, CMG-LF-SC-011, CMG-LF-SC-013, CMG-LF-SC-015, CMG-LF-SC-017, CMG-LF-SC-019, CMG-LF-SC-021, CMG-LF-SC-023, CMG-LF-SC-025, CMG-LF-SC-027, CMG-LF-SN-01, CMG-LF-SN-03, CMG-LF-SN-05, CMG-LF-SN-07, CMG-LF-SN-09, CMG-LF-SN-11, CMG-LF-SI-001, CMG-LF-SI-003, CMG-LF-CC-001, CMG-LF-CC-003, CMG-LF-CC-005, CMG-LF-CC-007, CMG-LF-CC-009, CMG-LF-CC-011, CMG-LF-CC-013, CMG-LF-CC-015, CMG-LF-CC-017, CMG-LF-CC-019, CMG-LF-CC-021, CMG-LF-CC-023, CMG-LF-CC-025, CMG-LF-CC-027, CMG-LF-CC-029, CMG-LF-CC-031, CMG-LF-CC-033, CMG-LF-CC-035, CMG-LF-CC-037, CMG-LF-CC-039, CMG-LF-CC-041, CMG-LF-CC-043, CMG-LF-CC-045, CMG-LF-CC-047, CMG-LF-CC-049, CMG-LF-CC-051, CMG-LF-CC-053, CMG-LF-CC-055, CMG-LF-CC-057, CMG-LF-CC-059, CMG-LF-CC-061, CMG-LF-CC-063, CMG-LF-CC-065, CMG-LF-CC-067, CMG-LF-CC-069, CMG-LF-CC-071, CMG-LF-CC-073, and CMG-LF-CC-075 the Indicator Monitored column was amended to include ", and:". This is to clarify that the monitoring option is paired with the immediately following option. For example, monitoring inlet gas temperature once per day (CMG-LF-CC-001) and monitoring NOX concentration once every two years (CMG-LF-CC-002) are both required for providing a reasonable assurance of compliance for an emission unit (such as an engine) using a catalytic converter for NOX control.

Comment 3

The commenter stated that in the terms, (a)(5) states "All combustion units....", while the intent is to clarify that any combustion units including boilers, process heaters, incinerators, and steam generators are subject to this rule, it may be construed as to include flares as well. The commenter requested the removal of the word "All."

Response 3

The ED agrees with the commenter to remove the word "All." To improve clarity, the following changes were made to proposed term (a)(5) in the GOP 517, returning to original term (a)(4):

- "All" was removed from (a)(4).
- (a)(5) was modified to the original term (a)(4) of the GOP 517.
- References to process heaters and incinerators were removed from term (a)(4) to maintain consistency with GOP 517 Table 30 which permits liquid fuel use.
- Terms (a)(5) and (a)(6) in the GOP 517 were modified and returned to original terms in GOP 517. These terms were returned to the original language for the conditions for stationary gas turbines and electric generating facilities that supply electric power to the grid. These terms are appropriate for the

MSWL industry and maintain consistency with the terms in (a)(4) being returned to the original conditions.

Comment 4

The commenter stated that in the site-wide requirements, section (b)(8)(D) only lists certain Permits by Rule (PBRs) from 30 TAC for this GOP and requests clarification regarding other PBRs that may be claimed for this GOP.

Response 4

The ED agrees that GOP 517 only lists certain PBRs and only these may be claimed for this GOP. The PBRs that may be codified into this GOP are the specific ones listed in (b)(8)(D). Considering this, the ED is restoring the PBRs: 30 TAC § 106.102 (Comfort Heating), 30 TAC § 106.148 (Material Unloading), 30 TAC § 106.244 (Ovens, Barbecue Pits, and Cookers), 30 TAC § 106.266 (Vacuum Cleaning Systems), and 30 TAC § 106.451 (Wet Cleaning) to the list of PBRs in the terms (b)(8)(D) and the Statement of Basis in the New Source Review Requirements section. The PBRs specified are appropriate for the industry covered in this GOP. Based on public outreach and previous reviews of MSWL sites during the initial GOP 517 it was determined that these are facilities that could be located at an MSWL site. For example, 30 TAC § 106.433 could be used for coating or stripping operations to prevent corrosion of landfill equipment, such as waste disposal canisters and land moving equipment.

Comment 5

The commenter stated that in the GOP 517 section (c), Tables 22, 31, 38, and 52 do not have active hyperlinks.

Response 5

The ED agrees that the hyperlinks should be active for all the tables, and the hyperlinks were updated.

Comment 6

The commenter requested clarification regarding the vertical bar “|” in (c), Tables 59 and 62.

Response 6

To clarify, the ED uses the vertical bar notation “|” to distinguish between unique emission limits within one regulatory citation. The ED consistently applies this construction in the “Decision Support System for Air Operating Permits” as shown in the “Requirement Reference Tables” and when navigating the flowcharts. The initial page of the “Requirement Reference Tables” found in the “Decision Support System for Air Operating Permits” provides a Table of Contents for the “Requirement Reference Tables” and will provide clarity for applicants.

For example, the vertical bar notation “|” found in Table 59 in row 517-59-004 for §115.453(a)(1)(C) – Table 1|1 and § 115.453(a)(1)(C) – Table 1|2 is necessary because § 115.453(a)(1)(C) in Table 1 has unique emission limitations for “Baked” and “Air Dried” pounds of VOC per gallon of coating. The Table of Contents for these two citations are listed as:

- § 115.453(a)(1)(C) – Table 1|1 Miscellaneous metal parts baked coating limits in lbs. of VOC/gallon of coating, and
- § 115.453(a)(1)(C) – Table 1|2 Miscellaneous metal parts air-dried coating limits in lbs. of VOC/gallon of coating.

Comment 7

The commenter stated that for the GOP 517 section (c), Table1: NSPS GG (Turbines), under Regulatory Requirements (Exemptions), it states § 60.333(a) can be used. However, in the Proposed Terms, (a)(6)(D) says that this cannot be used. The commenter requested the tables and terms be consistent.

Response 7

The ED agrees that the GOP 517 section (c), tables should be consistent with the terms. The ED changed Term (a)(6) to allow the use of § 60.333(a) to comply with NSPS GG, returning to the original terms of (a)(5) of

the GOP. With the change, it is not necessary to revise Table 1. The ED did not revise Table 1 since both § 60.333(a) and (b) may be used.

Terms (a)(4), (a)(5), and (a)(6) were modified to the original terms in GOP 517. These terms were returned to the original language for the conditions for boilers and steam generators, stationary gas turbines, and electric generating facilities that supply electric power to the grid; are appropriate for the MSWL industry; and maintain consistency with the original conditions.

Comment 8

The commenter requested clarification for the GOP 517 section (c), Table 5: § 115.B.1 (Tanks) regarding what GOP index number should be used for storage tanks/vessels that store a product other than crude oil, condensate, or fuel.

Response 8

The ED recommends that the commenter utilize form OP-UA3, Table 4.a. instructions and GOP 517 Table (6) to determine what GOP Index numbers are appropriate for storage tanks/vessels at the site.

Comment 9

The commenter stated that for the GOP 517 section (c), Table 6: § 115.B.1 (Tanks), § 115.116(b)(1), (b)(2) (Testing Requirements) are listed as new Regulatory Requirements, but it is recommended that all § 115.116 requirements be moved to the Monitoring and Testing requirements column.

Response 9

The ED does not agree with the changes proposed. The Title V Operating Permit codifies the applicable requirements based on unit attributes into Standard, Monitoring/Testing, Recordkeeping and Reporting depending on the specification of the individual citation. While the ED acknowledges that the § 115.116 section head is titled "Testing Requirements," the subparagraphs § 115.116(b)(1) and (2) qualify as standards since they quantify an operating requirement.

Comment 10

The commenter stated that for the GOP 517 section (c), Table 23: § 115.C.1 (Load-Unload) needs a GOP Index number added to table for gasoline storage vessels at a motor vehicle fuel dispensing facilities (MVFDF).

Response 10

The ED agrees that an additional GOP Index number would provide clarity in Table 23 and Table 24, and has revised these tables. The ED agrees that the MVFDF are exempt from the requirements of 30 TAC Chapter 115, Subchapter C, Division 1.

Comment 11

The commenter stated that for the GOP 517 section (c), Table 25: § 115.E.1 (Degreasing) GOP Index No. 517-25-012 shows the regulatory requirement of §115.421 (for surface coating processes) and needs to be revised to § 115.412.

Response 11

The ED agrees to correct the typographical error. The regulatory requirements in Table 25 apply to 30 TAC Chapter 115, Subchapter E, Division 1 and not 30 TAC Chapter 115, Subchapter E, Division 2. The regulatory requirements for the GOP Index No. 517-25-012 were amended.

Comment 12

The commenter stated that for the GOP 517 section (c), Table 45: MACT DDDDD (Boilers) GOP Index Nos. 511-45-011 and 511-45-012 need to be revised to 517 index numbers.

Response 12

The ED agrees that the GOP Index numbers in Table 45 should reference the 517, Municipal Solid Waste Landfill. The GOP Index Nos. 511-45-011 and 511-45-012 were amended to correct the typographical error. In

addition, the GOP Index Nos. 511-62-011 and 511-62-012 in Table 62 were also amended to correct typographical errors.

Comment 13

The commenter stated that for the GOP 517 section (c), Table 52: § 117.B.4 (D Engines) MERT NOx Monitoring System GOP Index Nos. 517-52-019, 517-52-022, 517-52-025, 517-52-028, and 517-52-031 need to revise the § 117.410 citations similar to other rows because the rule has been renumbered. The commenter also noted that GOP Index No. 517-59-016 is the only MERT GOP index number with revised citations for § 117.410.

Response 13

The ED agrees and GOP Index numbers 517-52-019, 517-52-022, 517-52-025, 517-52-028, and 517-52-031 were amended to accurately reflect the § 117.410 citations due to the rule being renumbered.

Comment 14

The commenter stated that for the GOP 517 section (c), Table 52: § 117.B.4 (D Engines) Index No. 517-52-015 Monitoring and Testing requirement § 117.440(a)(2)(D) is listed after § 117[G](c)(3). To avoid confusion, the commenter recommended to move (a)(2)(D) after (a)(2)(C) so the regulatory references are chronological.

Response 14

The ED agrees that all the citations throughout the GOP should be in numerical and alphabetical order and has moved (a)(2)(D) after (a)(2)(C) so the regulatory references are chronological.

Comment 15

The commenter stated that for the GOP 517 section (c), Table 52: § 117.B.4 (D Engines) Index Nos. 517-52-018; 517-52-021, and 517-52-024 for engines with PEMs NOx Monitoring System list § 117.440(a)(2)(D) twice. The commenter recommended to remove one of them.

Response 15

The ED agrees that § 117.440(a)(2)(D) should not be listed twice, and the following GOP Index numbers 517-52-018, 517-52-021, and 517-52-024 were corrected and amended.

Comment 16

The commenter stated that for the GOP 517 section (c), Table 52: § 117.B.4 (D Engines) Index No. 517-52-027 (for PEMS) should remove § 117.440(k)(2).

Response 16

The ED agrees § 117.440(k)(2) is not applicable and removed § 117.440(k)(2) from GOP Index number 517-52-027.

Comment 17

The commenter stated that for the GOP 517 section (c), Table 58: § 115.E.6 Industrial Solvent for Compliance Demonstration "Achieving an overall control efficiency of 85% by mass using a vapor control system" the Recordkeeping Requirement § 115.468(a) refers to monitoring requirements and should be revised to § 115.468(b), which is the recordkeeping requirement.

Response 17

The ED partially agrees with the changes proposed. The citation § 115.468(a) has both a monitoring and recordkeeping component. The operational parameters of the required control device must be both measured and recorded to ensure proper function of the device. The ED has determined that § 115.468(b) is not a recordkeeping requirement. However, § 115.468(b)(4)-(5) are recordkeeping requirements for index numbers 517-58-008 through 517-058-015 and these requirements have been added

Comment 18

The commenter stated that for the GOP 517 section (c), Table 59: § 115.E.5 Coating there are two GOP Index Nos. for 517-59-014 and requested one of the index numbers be renumbered.

Response 18

The ED agrees that each GOP Index number should be specific to the unit attributes, and the GOP Index numbers 517-59-014 were revised. The previous index number of 517-59-014 for 90% control vapor for "Process is applying coatings in combination with a vapor control system AND applying coatings which meet the specified VOC emission limits on a pound of VOC per gallon of solids basis" was renumbered to 517-59-015.

Comment 19

The commenter asked that for the GOP 517 section (c), Table 63: NSPS XXX Landfills, Index No. 517-63-002: Reporting requirement § 60.767[G](j) be removed for this index number. The commenter stated that this rule does not apply to landfills with this GOP index number because they are not subject to § 60.765(a)(3)(iii) or (a)(5)(iii).

Response 19

The ED agrees that the reporting requirement [G]§ 60.767(j) is only applicable to the operating scenarios for which corrective action is required according to §§ 60.765(a)(3)(iii) or 60.765(a)(5)(iii). Therefore, the reporting requirement [G]§60.767(j) was removed from GOP Index Nos. 517-63-002, 517-63-003, 517-63-004 and 517-63-005.

Comment 20

The commenter asked that for the GOP 517 section (c), Table 63: NSPS XXX Landfills, Index No. 517-63-003: Reporting requirement § 60.767(c)(4) be removed from this requirement. The commenter stated that this rule does not apply to landfills with this GOP Index number because the landfills have a Tier 1 NMOC emission rate less than 34 Mg/yr.

Response 20

The ED agrees that the reporting requirement § 60.767(c)(4) is only applicable to the MSW landfills complying with § 60.762(b)(2) which refers to an emission limit of greater than 34 Mg /year. Therefore, the reporting requirement §60.767(c)(4) was removed from GOP Index No. 517-63-003, reporting requirements § 60.767(c)(4) and (c)(4)(i) were removed from GOP Index No. 517-63-004, and reporting requirements § 60.767(c)(4) and (c)(4)(i) were removed from GOP Index No. 517-63-005.

Comment 21

The commenter stated that for the GOP 517 Periodic Monitoring (g), PMG-LF-S-002 Table for SO₂ (p. 25) the "All Emission Units" labeled in the top left corner for the description of the table is not accurate. The commenter requested the table be revised indicate the type of units applicable to the periodic monitoring requirement (i.e., Liquid-fired fuel).

Response 21

The ED agrees and has amended the table title for PM option PMG-LF-S-002 to "Emission Units firing liquid fuel" for clarification on the specific types of emission units that this option may apply to. Option PMG-LF-S-002 was designed for liquid fuel-fired heaters subject to SO₂ emission limits in 30 TAC Chapter 112, Control of Sulfur Compounds, that require periodic monitoring as indicated in GOP Index Numbers 517-30-001, 517-30-002, 517-30-003, and 517-30-004 in the GOP 517 requirement tables.

Other Changes

During final preparation of the GOP 517 documents, the language was adjusted to reflect issuance instead of proposal and the following changes were made:

- The proposed new term (a)(4) regarding volatile organic compound water separators was removed. Adding this requirement to be consistent with another industry, oil and gas, was determined to not be adequate justification to include as a requirement for the MSWL industry.
- Table 64 § 117.B.3 (Incinerators) and Table 65 § 117.B.4 (Incinerators) were removed because the 30 TAC Chapter 117, incinerators at the MSWL sites permitted with GOP 517 do not need the 30 TAC Chapter 117 requirements. The MSWL Standard Permit does not allow for authorization to be claimed for incineration (not including flares or air curtain incinerators), other than that used to control landfill gas emissions, as defined in 40 Code of Federal Regulations Part 60, Subpart WWW. Also, PBRs 30 TAC § 106.181 (Used-Oil Combustion Units) limits combustion units in combination to 1 MMBtu (individual combustion units to .5 MMBtu); 30 TAC § 106.183 (Boilers, Heaters, and Other Combustion Devices) limits incinerators to 40 MMBtu; and 30 TAC § 106.491 (Dual-Chamber Incinerators) limits burning to only waste generated on site or illegal drugs confiscated by law enforcement agencies, and the manufacturers rated capacity must be 500 pound per hour or less.