

Statement of Basis of the Federal Operating Permit

Formosa Plastics Corporation, Texas

Site/Area Name: Ethylene Glycol Plant

Physical location: 201 Formosa Drive

Nearest City: Point Comfort

County: Calhoun

Permit Number: O1484

Project Type: Renewal

Standard Industrial Classification (SIC) Code: 2821

SIC Name: Plastics Materials

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 11, 2014

Revised on: April 30, 2014

Operating Permit Basis of Determination

Permit Area Process Description

The Ethylene Glycol Plant produces Monoethylene Glycol (MEG), Diethylene Glycol (DEG), Triethylene Glycol (TEG), and Polyethylene Glycol (PEG). Ethylene and oxygen are reacted to form ethylene oxide (EO), which is reacted with water to produce ethylene glycol. A series of evaporators, drying columns, and distillation columns are used to distill the glycols into MEG, DEG, TEG, and PEG products.

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: O1951, O1953, O1954, O1955, O1956, O1957, O1958, O3409, O3421

Major Source Pollutants

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

Major Pollutants	VOC, PM, NOX, HAPS, CO, GHG
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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
 - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
 - Additional Monitoring Requirements
 - New Source Review Authorization Requirements
 - Compliance Requirements
 - Protection of Stratosphere Ozone
 - Permit Location
 - Permit Shield (30 TAC § 122.148)
- Attachments
 - Applicable Requirements Summary
 - Unit Summary
 - Applicable Requirements Summary
 - Additional Monitoring Requirements

- Permit Shield
- New Source Review Authorization References
- Compliance Plan
- Alternative Requirements
- Appendix A
 - Acronym list
- Appendix B
 - Copies of major NSR authorizations

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 a 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 are 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.

Appendix B

Copies of major NSR authorizations applicable to the units covered by this permit have been included in this Appendix, to ensure that all interested persons can access those authorizations.

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) and constructed after January 31, 1972 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 Requirement 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.A 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.

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)	Yes
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)	Yes
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
CAIR (Clean Air Interstate Rule)	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

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:

1. Office activities such as photocopying, blueprint copying, and photographic processes.
2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
4. Outdoor barbecue pits, campfires, and fireplaces.
5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
7. 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.
8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
9. Vehicle exhaust from maintenance or repair shops.
10. 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).
11. 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.
12. 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.
13. 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.
14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
15. Well cellars.
16. 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.
17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
18. Equipment used exclusively for the melting or application of wax.
19. 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.
20. Shell core and shell mold manufacturing machines.
21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
22. Equipment used for inspection of metal products.
23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.

24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
25. Battery recharging areas.
26. Brazing, soldering, or welding equipment.

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 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. 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 www.tceq.texas.gov/permitting/air/nav/air_supportsys.html. 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* Changes and Exceptions to DSS**
EP615	30 TAC Chapter 115, Storage of VOCs	R5111	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a submerged fill pipe True Vapor Pressure = True vapor pressure is less than 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 25,000 gallons
EP615	40 CFR Part 60, Subpart Kb	60Kb-1	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia
EP630A	30 TAC Chapter 115, Storage of VOCs	R5112-NEG	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a submerged fill pipe True Vapor Pressure = True vapor pressure is less than 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 25,000 gallons
EP630A	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 subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.
EP630B	30 TAC Chapter 115, Storage of VOCs	R5112-NEG	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a submerged fill pipe True Vapor Pressure = True vapor pressure is less than 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 25,000 gallons
EP630B	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 subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is subject to 40 CFR Part 60, Subpart Kb.
EP630C	30 TAC Chapter 115, Storage of VOCs	R5112-NEG	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a submerged fill pipe True Vapor Pressure = True vapor pressure is less than 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 25,000 gallons
EP630C	40 CFR Part 63,	63G-1	MACT Subpart F/G Applicability = The unit is a Group 2 vessel.

Unit ID	Regulation	Index Number	Basis of Determination* Changes and Exceptions to DSS**
	Subpart G		NESHAP Subpart Y Applicability = The unit is subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is subject to 40 CFR Part 60, Subpart Kb.
EP725A	30 TAC Chapter 115, Storage of VOCs	R5112-NEG	Construction Date = On or after May 12, 1973 Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a submerged fill pipe True Vapor Pressure = True vapor pressure is less than 1.5 psia 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
EP725A	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 subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is subject to 40 CFR Part 60, Subpart Kb.
EP725B	30 TAC Chapter 115, Storage of VOCs	R5112-NEG	Construction Date = On or after May 12, 1973 Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a submerged fill pipe True Vapor Pressure = True vapor pressure is less than 1.5 psia 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
EP725B	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 subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is subject to 40 CFR Part 60, Subpart Kb.
EP730A	30 TAC Chapter 115, Storage of VOCs	R5112-NEG	Construction Date = On or after May 12, 1973 Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a submerged fill pipe True Vapor Pressure = True vapor pressure is less than 1.5 psia 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
EP730A	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 subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is subject to 40 CFR Part 60, Subpart Kb.
EP730B	30 TAC Chapter 115, Storage of VOCs	R5112-NEG	Construction Date = On or after May 12, 1973 Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a submerged fill pipe

Unit ID	Regulation	Index Number	Basis of Determination* Changes and Exceptions to DSS**
			<p>True Vapor Pressure = True vapor pressure is less than 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
EP730B	40 CFR Part 63, Subpart G	63G-1	<p>MACT Subpart F/G Applicability = The unit is a Group 2 vessel.</p> <p>NESHAP Subpart Y Applicability = The unit is subject to 40 CFR Part 61, Subpart Y.</p> <p>NSPS Subpart Kb Applicability = The unit is subject to 40 CFR Part 60, Subpart Kb.</p>
EP740	30 TAC Chapter 115, Storage of VOCs	R5112-NEG	<p>Construction Date = On or after May 12, 1973</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe</p> <p>True Vapor Pressure = True vapor pressure is less than 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
EP740	40 CFR Part 63, Subpart G	63G-1	<p>MACT Subpart F/G Applicability = The unit is a Group 2 vessel.</p> <p>NESHAP Subpart Y Applicability = The unit is subject to 40 CFR Part 61, Subpart Y.</p> <p>NSPS Subpart Kb Applicability = The unit is subject to 40 CFR Part 60, Subpart Kb.</p>
EP750	30 TAC Chapter 115, Storage of VOCs	R5111	<p>Construction Date = On or after May 12, 1973</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe</p> <p>True Vapor Pressure = True vapor pressure is less than 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
EP750	40 CFR Part 63, Subpart G	63G-1	<p>MACT Subpart F/G Applicability = The unit is a Group 2 vessel.</p> <p>NESHAP Subpart Y Applicability = The unit is subject to 40 CFR Part 61, Subpart Y.</p> <p>NSPS Subpart Kb Applicability = The unit is subject to 40 CFR Part 60, Subpart Kb.</p>
PEG CG LOAD	30 TAC Chapter 115, Loading and Unloading of VOC	R5217-1	<p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Gasoline</p> <p>Transfer Type = Only unloading.</p> <p>True Vapor Pressure = True vapor pressure is less than 1.5 psia.</p>
PEG CG LOAD	40 CFR Part 63, Subpart G	63G-2	<p>Transfer Rack Type = Group 2 transfer rack (as defined in 40 CFR § 63.111).</p> <p>Subject to Subpart BB = The transfer rack is not subject to 40 CFR Part 61, Subpart BB.</p>

Unit ID	Regulation	Index Number	Basis of Determination* Changes and Exceptions to DSS**
EP910	40 CFR Part 60, Subpart D	60D	<p>Construction/Modification Date = After September 18, 1978.</p> <p>Covered Under Subpart Da = The steam generating unit is not covered under 40 CFR Part 60, Subpart Da.</p> <p>Changes to Existing Affected Facility = No change has been made to the existing fossil fuel-fired steam generating unit.</p> <p>Heat Input Rate = Heat input rate is less than or equal to 250 MMBtu/hr (73 MW).</p>
EP910	40 CFR Part 60, Subpart Db	60Db	<p>Construction/Modification Date = On or after November 25, 1986, and on or before July 9, 1997.</p> <p>Heat Input Capacity = Heat input capacity is less than or equal to 100 MMBtu/hr (29 MW).</p> <p>Subpart Da = The affected facility does not meet applicability requirements of 40 CFR Part 60, Subpart Da.</p> <p>Changes to Existing Affected Facility = No change has been made to the existing steam generating unit, which was not previously subject to 40 CFR Part 60, Subpart Db, for the sole purpose of combusting gases containing totally reduced sulfur as defined under 40 CFR § 60.281.</p>
EP910	40 CFR Part 60, Subpart Dc	60Dc-1	<p>CONSTRUCTION/MODIFICATION DATE = After June 9, 1989 but on or before February 28, 2005.</p> <p>PM MONITORING TYPE = No particulate monitoring.</p> <p>MAXIMUM DESIGN HEAT INPUT CAPACITY = Maximum design heat input capacity is greater than or equal to 10 MMBtu/hr (2.9 MW) but less than or equal to 100 MMBtu (29 MW).</p> <p>SO₂ INLET MONITORING TYPE = No SO₂ monitoring.</p> <p>OTHER SUBPARTS = The facility is not covered under 40 CFR Part 60, Subparts AAAA or KKKK, or under an approved State or Federal section 111(d)/129 plan implementing 40 CFR Part 60, Subpart BBBB.</p> <p>SO₂ OUTLET MONITORING TYPE = No SO₂ monitoring.</p> <p>HEAT INPUT CAPACITY = Heat input capacity is greater than 10 MMBtu/hr (2.9 MW) but less than 30 MMBtu/hr (8.7 MW).</p> <p>TECHNOLOGY TYPE = None.</p> <p>D-SERIES FUEL TYPE = Natural gas.</p> <p>ACF OPTION - SO₂ = Other ACF or no ACF.</p> <p>ACF OPTION - PM = Other ACF or no ACF.</p> <p>30% COAL DUCT BURNER = The facility does not combust coal in a duct burner as part of a combined cycle system; or more than 30% of the heat is from combustion of coal and less than 70% is from exhaust gases entering the duct burner.</p>
EGFUG1	40 CFR Part 63, Subpart H	63H-1	<p>ANY (CLOSED VENT SYSTEMS) = COMPONENT PRESENT</p> <p>ANY (OPEN-ENDED VALVES OR LINES) = COMPONENT PRESENT</p> <p>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</p> <p>EQUIPMENT TYPE = FUGITIVE UNIT CONTAINS EQUIPMENT LISTED IN 40 CFR § 63.160(A) WHICH IS OPERATED IN ORGANIC HAZARDOUS AIR POLLUTANT SERVICE</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>LIGHT LIQUID SERVICE (PUMPS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (PUMPS) = COMPONENT PRESENT</p> <p>NON RESEARCH AND DEVELOPMENT/BATCH PROCESSES = FUGITIVE UNIT CONTAINS PROCESSES OTHER THAN RESEARCH AND DEVELOPMENT FACILITIES AND BENCH-SCALE BATCH PROCESSES</p>

Unit ID	Regulation	Index Number	Basis of Determination* Changes and Exceptions to DSS**
			RECOVERY OR RECAPTURE DEVICES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT UNSAFE TO INSPECT = FOR A FUGITIVE UNIT THAT CONTAINS ANY CLOSED-VENT SYSTEM, THERE ARE NO PARTS DESIGNATED AS UNSAFE TO INSPECT ANY (INSTRUMENTATION SYSTEMS) = COMPONENT PRESENT DIFFICULT TO INSPECT = FOR A FUGITIVE UNIT THAT CONTAINS ANY CLOSED-VENT SYSTEM, THERE ARE NO PARTS DESIGNATED AS DIFFICULT TO INSPECT GAS/VAPOR OR LIGHT LIQUID SERVICE (VALVES) = COMPONENT PRESENT QIP = UNIT OPTS TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR PUMPS VACUUM SERVICE = NOT ALL OF THE EQUIPMENT IN THE FUGITIVE UNIT IS IN VACUUM SERVICE ANY (COMPRESSORS) = COMPONENT PRESENT EMPLOYEE NUMBER = THE CORPORATION EMPLOYS 100 OR MORE PERSONS ENCLOSED COMBUSTION DEVICES (CLOSED VENT SYSTEMS) = COMPONENT PRESENT HEAVY LIQUID SERVICE (INSTRUMENTATION SYSTEMS) = COMPONENT NOT PRESENT HEAVY LIQUID SERVICE (VALVES) = COMPONENT PRESENT 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 ANY (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT PRESENT GAS VAPOR SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT QIP = UNIT OPTS TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR VALVES AMEL = FUGITIVE UNIT SOURCE OWNER/OPERATOR IS NOT ELECTING TO COMPLY WITH AN ALTERNATIVE MEANS OF EMISSION LIMITATION (AMEL) FLARES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT GAS/VAPOR OR LIGHT LIQUID SERVICE (CONNECTORS) = COMPONENT PRESENT HEAVY LIQUID SERVICE (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT HEAVY LIQUID SERVICE (CONNECTORS) = COMPONENT PRESENT HEAVY LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT ANY (SAMPLING CONNECTION SYSTEMS) = COMPONENT PRESENT HEAVY LIQUID SERVICE (SAMPLING CONNECTION SYSTEMS) = COMPONENT NOT PRESENT
EG-CT	40 CFR Part 63, Subpart Q	63Q	USED CHROMIUM COMPOUNDS AFTER SEPT. 8 1994 (MACT Q) = The industrial process cooling tower has not used compounds containing chromium on or after September 8, 1994.
EP221	30 TAC Chapter 115, Vent Gas Controls	R5121-1	Alternate Control Requirement = Alternate control is not used. 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. Control Device Type = Direct flame incinerator in which the vent gas stream is burned at a temperature or at least 1300° F (704 C). Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.

Unit ID	Regulation	Index Number	Basis of Determination* Changes and Exceptions to DSS**
			<p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration = VOC concentration is less than 30,000 ppmv.</p>
EP910	30 TAC Chapter 115, Vent Gas Controls	R5121-2	<p>Alternate Control Requirement = Alternate control is not used. 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. Control Device Type = Direct flame incinerator in which the vent gas stream is burned at a temperature or at least 1300° F (704 C). Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene. Combined 24-Hour VOC Weight = Combined VOC weight is greater than 100 pounds (45.4 kg). VOC Concentration = VOC concentration is greater than or equal to 30,000 ppmv.</p>
EP910	40 CFR Part 63, Subpart G	63G-3	<p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used. Control Device = Thermal incinerator. Overlap = Title 40 CFR Part 63, Subpart G only Group 1 = The process vent meets the definition of a Group 1 process vent. Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118. Halogenated = Vent stream is not halogenated. TRE for Halogenated Vent Stream = The total resource effectiveness (TRE) index value is not being calculated for a halogenated vent stream. By-pass Lines = The vent system contains by-pass lines that can divert the vent stream from the control device. Flow Indicator = A flow indicator is installed and operated at the entrance of the by-pass line. Performance Test = A performance test was conducted for determining compliance with a regulation promulgated by the EPA using the same methods specified in Subpart G and either no process changes have been made, or the results reliably indicate compliance.</p>
RTO221	30 TAC Chapter 115, Vent Gas Controls	R5121-3	<p>Alternate Control Requirement = Alternate control is not used. 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. Control Device Type = Direct flame incinerator in which the vent gas stream is burned at a temperature or at least 1300° F (704 C). Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene. Combined 24-Hour VOC Weight = Combined VOC weight is greater than 100 pounds (45.4 kg). VOC Concentration = VOC concentration is less than 30,000 ppmv.</p>
GC-537	40 CFR Part 60, Subpart NNN	60NNN-1	<p>40 CFR 60 (NSPS) SUBPART NNN CHEMICALS = DISTILLATION UNIT PRODUCES ANY CHEMICAL LISTED IN 40 CFR § 60.667 AS A PRODUCT, CO-PRODUCT, BY-PRODUCT, OR INTERMEDIATE TOTAL RESOURCE EFFECTIVENESS (TRE) [NSPS NNN] = < OR EQUAL TO 8.0 FROM HALOGENATED VENT STREAM CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS NNN] = AFTER DECEMBER 30, 1983 TOTAL ORGANIC COMPOUNDS (TOC) REDUCTION = COMPLIANCE IS ACHIEVED THROUGH THE USE OF A NON-FLARE COMBUSTION</p>

Unit ID	Regulation	Index Number	Basis of Determination* Changes and Exceptions to DSS**
			DEVICE. 40 CFR 60 (NSPS) SUBPART NNN CONTROL DEVICE = THERMAL INCINERATOR VENT TYPE [NSPS NNN] = NOT DISCHARGING A VENT STREAM TO A VRS DISTILLATION UNIT TYPE (NSPS NNN) = DOES NOT QUALIFY FOR ANY EXEMPTION IN § 60.660(C)(1)-(3) TOTAL DESIGN CAPACITY [NSPS NNN] = > OR EQUAL TO 1 GGRAM/YR VENT STREAM FLOW RATE [NSPS NNN] = > OR EQUAL TO 0.008 SCM/MIN
GC-610	40 CFR Part 60, Subpart NNN	60NNN-1	40 CFR 60 (NSPS) SUBPART NNN CHEMICALS = DISTILLATION UNIT PRODUCES ANY CHEMICAL LISTED IN 40 CFR § 60.667 AS A PRODUCT, CO-PRODUCT, BY-PRODUCT, OR INTERMEDIATE TOTAL RESOURCE EFFECTIVENESS (TRE) [NSPS NNN] = < OR EQUAL TO 8.0 FROM HALOGENATED VENT STREAM CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS NNN] = AFTER DECEMBER 30, 1983 TOTAL ORGANIC COMPOUNDS (TOC) REDUCTION = COMPLIANCE IS ACHIEVED THROUGH THE USE OF A NON-FLARE COMBUSTION DEVICE. 40 CFR 60 (NSPS) SUBPART NNN CONTROL DEVICE = THERMAL INCINERATOR VENT TYPE [NSPS NNN] = NOT DISCHARGING A VENT STREAM TO A VRS DISTILLATION UNIT TYPE (NSPS NNN) = DOES NOT QUALIFY FOR ANY EXEMPTION IN § 60.660(C)(1)-(3) TOTAL DESIGN CAPACITY [NSPS NNN] = > OR EQUAL TO 1 GGRAM/YR VENT STREAM FLOW RATE [NSPS NNN] = > OR EQUAL TO 0.008 SCM/MIN
GC-620	40 CFR Part 60, Subpart NNN	60NNN-1	40 CFR 60 (NSPS) SUBPART NNN CHEMICALS = DISTILLATION UNIT PRODUCES ANY CHEMICAL LISTED IN 40 CFR § 60.667 AS A PRODUCT, CO-PRODUCT, BY-PRODUCT, OR INTERMEDIATE TOTAL RESOURCE EFFECTIVENESS (TRE) [NSPS NNN] = < OR EQUAL TO 8.0 FROM HALOGENATED VENT STREAM CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS NNN] = AFTER DECEMBER 30, 1983 TOTAL ORGANIC COMPOUNDS (TOC) REDUCTION = COMPLIANCE IS ACHIEVED THROUGH THE USE OF A NON-FLARE COMBUSTION DEVICE. 40 CFR 60 (NSPS) SUBPART NNN CONTROL DEVICE = THERMAL INCINERATOR VENT TYPE [NSPS NNN] = NOT DISCHARGING A VENT STREAM TO A VRS DISTILLATION UNIT TYPE (NSPS NNN) = DOES NOT QUALIFY FOR ANY EXEMPTION IN § 60.660(C)(1)-(3) TOTAL DESIGN CAPACITY [NSPS NNN] = > OR EQUAL TO 1 GGRAM/YR VENT STREAM FLOW RATE [NSPS NNN] = > OR EQUAL TO 0.008 SCM/MIN
GC-630	40 CFR Part 60, Subpart NNN	60NNN-1	40 CFR 60 (NSPS) SUBPART NNN CHEMICALS = DISTILLATION UNIT PRODUCES ANY CHEMICAL LISTED IN 40 CFR § 60.667 AS A PRODUCT, CO-PRODUCT, BY-PRODUCT, OR INTERMEDIATE TOTAL RESOURCE EFFECTIVENESS (TRE) [NSPS NNN] = < OR EQUAL TO 8.0 FROM HALOGENATED VENT STREAM CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS NNN] = AFTER DECEMBER 30, 1983 TOTAL ORGANIC COMPOUNDS (TOC) REDUCTION = COMPLIANCE IS ACHIEVED THROUGH THE USE OF A NON-FLARE COMBUSTION DEVICE. 40 CFR 60 (NSPS) SUBPART NNN CONTROL DEVICE = THERMAL INCINERATOR VENT TYPE [NSPS NNN] = NOT DISCHARGING A VENT STREAM TO A VRS DISTILLATION UNIT TYPE (NSPS NNN) = DOES NOT QUALIFY FOR ANY EXEMPTION IN § 60.660(C)(1)-(3)

Unit ID	Regulation	Index Number	Basis of Determination* Changes and Exceptions to DSS**
			TOTAL DESIGN CAPACITY [NSPS NNN] = > OR EQUAL TO 1 GGRAM/YR VENT STREAM FLOW RATE [NSPS NNN] = > OR EQUAL TO 0.008 SCM/MIN
GC-710	40 CFR Part 60, Subpart NNN	60NNN-1	40 CFR 60 (NSPS) SUBPART NNN CHEMICALS = DISTILLATION UNIT PRODUCES ANY CHEMICAL LISTED IN 40 CFR § 60.667 AS A PRODUCT, CO-PRODUCT, BY-PRODUCT, OR INTERMEDIATE TOTAL RESOURCE EFFECTIVENESS (TRE) [NSPS NNN] = < OR EQUAL TO 8.0 FROM HALOGENATED VENT STREAM CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS NNN] = AFTER DECEMBER 30, 1983 TOTAL ORGANIC COMPOUNDS (TOC) REDUCTION = COMPLIANCE IS ACHIEVED THROUGH THE USE OF A NON-FLARE COMBUSTION DEVICE. 40 CFR 60 (NSPS) SUBPART NNN CONTROL DEVICE = THERMAL INCINERATOR VENT TYPE [NSPS NNN] = NOT DISCHARGING A VENT STREAM TO A VRS DISTILLATION UNIT TYPE (NSPS NNN) = DOES NOT QUALIFY FOR ANY EXEMPTION IN § 60.660(C)(1)-(3) TOTAL DESIGN CAPACITY [NSPS NNN] = > OR EQUAL TO 1 GGRAM/YR VENT STREAM FLOW RATE [NSPS NNN] = > OR EQUAL TO 0.008 SCM/MIN
GC-720	40 CFR Part 60, Subpart NNN	60NNN-1	40 CFR 60 (NSPS) SUBPART NNN CHEMICALS = DISTILLATION UNIT PRODUCES ANY CHEMICAL LISTED IN 40 CFR § 60.667 AS A PRODUCT, CO-PRODUCT, BY-PRODUCT, OR INTERMEDIATE TOTAL RESOURCE EFFECTIVENESS (TRE) [NSPS NNN] = < OR EQUAL TO 8.0 FROM HALOGENATED VENT STREAM CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS NNN] = AFTER DECEMBER 30, 1983 TOTAL ORGANIC COMPOUNDS (TOC) REDUCTION = COMPLIANCE IS ACHIEVED THROUGH THE USE OF A NON-FLARE COMBUSTION DEVICE. 40 CFR 60 (NSPS) SUBPART NNN CONTROL DEVICE = THERMAL INCINERATOR VENT TYPE [NSPS NNN] = NOT DISCHARGING A VENT STREAM TO A VRS DISTILLATION UNIT TYPE (NSPS NNN) = DOES NOT QUALIFY FOR ANY EXEMPTION IN § 60.660(C)(1)-(3) TOTAL DESIGN CAPACITY [NSPS NNN] = > OR EQUAL TO 1 GGRAM/YR VENT STREAM FLOW RATE [NSPS NNN] = > OR EQUAL TO 0.008 SCM/MIN
GRP-RRR	40 CFR Part 60, Subpart RRR	60RRR-1	CHEMICALS LISTED IN §60.707 = AFFECTED FACILITY IS PART OF A PROCESS UNIT THAT PRODUCES ANY CHEMICALS LISTED IN 40 CFR § 60.707 AS A PRODUCT, CO-PRODUCT, BY PRODUCT, OR INTERMEDIATE SECONDARY FUEL = VENT STREAM INTRODUCED WITH THE PRIMARY FUEL TOTAL DESIGN CAPACITY = TOTAL DESIGN CAPACITY IS GREATER THAN OR EQUAL TO 1 GIGAGRAM PER YEAR (1,100 TONS PER YEAR) BYPASS LINE = NO BYPASS LINE CONSTRUCTION/MODIFICATION DATE = AFTER JUNE 29, 1990 VENT STREAM FLOW RATE = VENT STREAM FLOW RATE IS GREATER THAN OR EQUAL TO 0.011 SCM/MIN OR VALUE IS NOT MEASURED AFFECTED FACILITY TYPE = FACILITY CANNOT BE CLASSIFIED IN ANY OF THE ABOVE CATAGORIES BYPASS LINE VALVE SECURED = FLOW INDICATOR USED TOC EXEMPTION = NO TOC CONCENTRATION EXEMPTION CONTROL DEVICE = INCINERATOR OTHER THAN A CATALYTIC INCINERATOR USED AS THE CONTROL DEVICE RECOVERY DEVICE = RECOVERY DEVICE OTHER THAN AN ABSORBER, CONDENSER, OR CARBON ADSORBER IS USED AS THE FINAL

Unit ID	Regulation	Index Number	Basis of Determination* Changes and Exceptions to DSS**
			RECOVERY DEVICE, APPROVED BY THE EPA ADMINISTRATOR SUBJECT TO TITLE 40 CFR PART 60 SUBPART DDD = NO SUBJECT TO TITLE 40 CFR PART 60 SUBPART NNN = YES TRE INDEX VALUE = TRE INDEX VALUE IS LESS THAN OR EQUAL TO 8.0, OR A TRE INDEX VALUE IS NOT CALCULATED OR CLAIMED FOR EXEMPTION § 60.700(C)(2) TRE FOR HALOGENATED VENT STREAM = YES
EG PLANT	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) Intervening Cooling Fluid = THERE IS NOT AN 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 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 (HAPS) IN TABLE 2 Table 4 HAP Content = A RECIRCULATING HEAT EXCHANGE SYSTEM IS NOT USED 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 Alternate Means of Emission Limitation = AN ALTERNATIVE MEANS OF EMISSION LIMITATION IS NOT USED TO ACHIEVE A REDUCTION IN ORGANIC HAP EMISSION NPDES Permit = HEAT EXCHANGE SYSTEM IS NOT SUBJECT TO A NPDES PERMIT WITH ALLOWABLE DISCHARGE LIMIT Meets 40 CFR 63.104(a)(4)(i)-(iv) = HEAT EXCHANGER NOT REQUIRED TO MEET THIS CITATION Heat Exchange System = A HEAT EXCHANGE SYSTEM IS USED Table 9 HAP Content = ONCE-THROUGH HEAT EXCHANGE SYSTEM IS NOT USED 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 = 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 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

* - 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 also 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.	FOP 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. 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. The following table specifies the permits by rule that apply to the site. All current permits by rule are contained in Chapter 106. Outdated 30 TAC Chapter 106 permits by rule may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html

Outdated Standard Exemption lists may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html

Prevention of Significant Deterioration (PSD) Permits	
PSD Permit No.: PSDTX1234	Issuance Date: 04/02/2013
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.: 19198	Issuance Date: 04/02/2013
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: 11/01/2003
Number: 106.264	Version No./Date: 09/04/2000
Number: 106.478	Version No./Date: 03/14/1997
Number: 106.511	Version No./Date: 09/04/2000

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 sandblasting 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.

Compliance Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on **April 11, 2014**.
2. The compliance history review evaluated the period from **February 4, 2008** to **April 11, 2014**.
Site rating: **7.65, Satisfactory** Company rating: **7.39, Satisfactory**
(High < 0.10; Satisfactory > 0.10 and < 55; Unsatisfactory > 55)
3. Has the permit changed on the basis of the compliance history or site/company rating?No

Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS?No
2. Is a compliance plan and schedule included in the permit?No

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-UA8 - Coal Preparation Plant Attributes
- OP-UA9 - Nonmetallic Mineral Process Plant 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 Semicheical Pulp Mill Attributes
OP-UA31 - Lead Smelting Attributes
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes
OP-UA33 - Metallic 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