

Statement of Basis of the Federal Operating Permit

ExxonMobil Oil Corporation

Site/Area Name: Mobil Beaumont Polyethylene Plant - Low Pressure Unit

Physical location: PO Box 2295

Nearest City: Beaumont

County: Jefferson

Permit Number: O2277

Project Type: Minor Revision

Standard Industrial Classification (SIC) Code: 2821

SIC Name: Plastics Materials

This Statement of Basis sets forth the legal and factual basis for the draft changes to the permit conditions resulting from the minor revision project in accordance with 30 TAC §122.201(a)(4). The applicant has submitted an application for a minor permit revision per §§ 122.215-217. This document may include the following information:

- A description of the facility/area process description;
- A description of the revision project;
- 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.

Revised on: November 21, 2013

Operating Permit Basis of Determination

Description of Revisions

ExxonMobil has requested to revise their Federal Operating Permit (FOP) to update their SRIC engine (M-4799) requirements for MACT ZZZZ and NSPS IIII applicability and 30 TAC Chapter 115 (Storage of VOCs) requirements for several storage tanks (GRPLPTANK1, 612-D4718, 612-D4723, 612-D4725, 612-D4749, 612-D4752, 612-D4754, 612-D4758, and 612-F5959) due to a recent rule revision. The revision also removed permit shields from 30 TAC Chapter 115 (Storage of VOCs) for GRPLPTANK1 and 612-F5959.

Permit Area Process Description

The major sections of the Beaumont Polyethylene Plant - Low Pressure Unit follow:

Raw Materials (Storage, Processing, and Preparation) and Catalyst Preparation:

Fresh ethylene feed is received via pipeline and is purified on-site. Comonomer is received in trucks or railcars, purified, and transferred to storage tanks. During regeneration of the purification beds, regeneration gas (other than air) is vented to the flare. Any venting during comonomer unloading is sent to the flare.

Different catalyst preparation methods are used to produce a variety of catalyst grades on-site and the catalyst may be activated on-site. During activation, the dehydrator vent is passed through a filter and a water scrubber and sent to the flare or atmosphere. Wastewater sludge from the scrubber is collected and transported off-site. The catalyst is transferred to storage after activation. Finished catalyst from the catalyst storage vessels is transferred to catalyst feeders for use in the LP production process. Off-specification catalyst from the catalyst preparation area is sent to waste storage for disposal.

Reaction:

Fresh and recycled ethylene, comonomers and other reactants, catalyst and sometimes seed resin are fed into the gas-phase fluidized bed reactors. Unreacted gas is compressed and recycled to the reactor. Seal leakage from the compressor is collected and sent to a separator. The separator vents to the flare and the oil is disposed.

A resin/gas mixture is withdrawn from the reactors and is routed to the product discharge system where gas is separated and returned to the reactors. Resin is transferred to the product purge vessels. Nitrogen is blown through the purge vessels to remove residual hydrocarbons from the resin. The purge gas is sent to comonomer recovery, and/or the flare. In the recovery units, recovered liquids are recycled back to the reactors and non-condensables are sent to the flare or partially recovered by adsorption.

Product Finishing:

Product finishing consists of:

- The purging of resin to remove residual hydrocarbons (as discussed above).
- The conveying of purged resin through particle screeners to booster stations and silos.
- The unloading of compounding additives from hopper cars, sacks or drums into silos or feed hoppers.
- The extrusion, pelletizing, and drying of the finished product.

Additives and resin are transferred into in-line blenders in the compounding area where the additive/resin mixture is extruded, pelletized underwater, separated via dewatering box/spin dryer, and conveyed to product silos. The additive/resin mixture can also be sent directly to the product silos for sale as a granular product. The conveying air/nitrogen used in product finishing is vented to the atmosphere through filters.

Product Storage:

Pellets are conveyed from the product silos to the prefill bins, and gravity fed into railcars. The particulate emissions from loading of railcars are controlled by dust collecting filters. The conveying air is vented to the atmosphere through filters or cyclone separators.

Material Recovery:

The Material Recovery Process section includes the equipment that recovers unreacted or by-product materials from any process section for return to the process line, off-site purification or treatment, or sale. There are no uncontrolled VOC vents to the atmosphere in this process section at the Low Pressure Plant.

Process Vents:

Several atmospheric process vents are located throughout the process at the Low Pressure Plant.

Utilities:

Three boilers supply steam to the Low Pressure polyethylene process where necessary. The combustion devices included in this application are not used as control devices. A cooling tower (F-701) supplies cooling water to the process. One flare (721) is air assisted, and the LRGO flare (858) is a pressure assisted flare.

Miscellaneous and Maintenance:

Solvents are used at the plant for maintenance/degreasing purposes. There are two degreasers and the Low Pressure plant. One SRIC Engine is used as an emergency diesel generator and it is operated less than 850 hours per year.

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: O1243

Major Source Pollutants

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

Major Pollutants	VOC, NOX, HAPS, CO
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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

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.

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.(iv) 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)	No
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**
M-4799	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-1	Brake HP = Stationary RICE with a brake hp greater than or equal to 300 hp and less than or equal to 500 hp. Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006. Service Type = Emergency use. Installation Date = The emergency use stationary RICE was installed on or after June 12, 2006. Stationary RICE Type = Compression ignition engine	Modified RRT determined attributes to clarify which specific exemption the SRIC engine qualifies for.
M-4799	40 CFR Part 60, Subpart IIII	60IIII-1	Brake HP+ Stationary RICE with a brake hp equal to 400 hp Construction/Reconstruction Date=2007 model year Stationary RICE Type = Compression ignition engine Service Type=Emergency use Cylinder Displacement <10 liter per cylinder Voltage or frequency deviations=No	Manually determined 40 CFR Part 60, Subpart IIII applicabilities using applicant supplied attributes
612-D4718	30 TAC Chapter 115, Storage of VOCs	R5112-0097	Today's Date = Today's date is before March 1, 2013. 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 vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 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 Control Device Type = Flare	Modified RRT to clarify initial design verification testing requirements for flare.
612-D4723	30 TAC Chapter 115, Storage of VOCs	R5112-0097	Today's Date = Today's date is before March 1, 2013. 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 vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 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 Control Device Type = Flare	Modified RRT to clarify initial design verification testing requirements for flare.
612-D4725	30 TAC Chapter 115, Storage of VOCs	R5112-0097	Today's Date = Today's date is before March 1, 2013. 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 vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 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	Modified RRT to clarify initial design verification testing requirements for flare.

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
612-D4749	30 TAC Chapter 115, Storage of VOCs	R5112-0132	<p>Control Device Type = Flare</p> <p>Today's Date = Today's date is before March 1, 2013.</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 vapor recovery system (VRS)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p> <p>Control Device Type = Flare</p>	Modified RRT to clarify initial design verification testing requirements for flare.
612-D4749	40 CFR Part 60, Subpart Kb	60Kb-0081	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 11.1 psia</p> <p>Storage Vessel Description = Closed vent system (CVS) with a flare used as the control device (fixed roof)</p>	
612-D4752	30 TAC Chapter 115, Storage of VOCs	R5112-0097	<p>Today's Date = Today's date is before March 1, 2013.</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 vapor recovery system (VRS)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 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> <p>Control Device Type = Flare</p>	Modified RRT to clarify initial design verification testing requirements for flare.
612-D4754	30 TAC Chapter 115, Storage of VOCs	R5112-0097	<p>Today's Date = Today's date is before March 1, 2013.</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 vapor recovery system (VRS)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 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> <p>Control Device Type = Flare</p>	Modified RRT to clarify initial design verification testing requirements for flare.
612-D4758	30 TAC Chapter 115, Storage of VOCs	R5112-0132	<p>Today's Date = Today's date is before March 1, 2013.</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 vapor recovery system (VRS)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p>	Modified RRT to clarify initial design verification testing requirements for flare.

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Control Device Type = Flare	
612-D4758	40 CFR Part 60, Subpart Kb	60Kb-0081	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 greater than or equal to 11.1 psia Storage Vessel Description = Closed vent system (CVS) with a flare used as the control device (fixed roof)	
612-F5959	30 TAC Chapter 115, Storage of VOCs	R5112-0006	Today's Date = Today's date is before March 1, 2013. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 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	
863	30 TAC Chapter 115, Storage of VOCs	R5112-0019	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 an internal floating roof (IFR) True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 40,000 gallons	
863	40 CFR Part 60, Subpart Kb	60Kb-0068	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 greater than or equal to 0.75 psia but less than 11.1 psia Storage Vessel Description = Fixed roof with an internal floating roof using two seals mounted one above the other to form a continuous closure	
GRPLPTANK1	30 TAC Chapter 115, Storage of VOCs	R5112-0006	Today's Date = Today's date is before March 1, 2013. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 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	
721	40 CFR Part 60, Subpart A	60A-001	SUBJECT TO 40 CFR 60.18 = Flare is subject to 40 CFR § 60.18. ADHERING TO HEAT CONTENT SPECIFICATIONS = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4). FLARE ASSIST TYPE [NSPS A, NESHAP A, AND/OR MACT A] = Air-assisted	
721	40 CFR Part 63, Subpart A	63A-001	REQUIRED UNDER 40 CFR 63 = Flare is required by a Subpart under 40 CFR Part 63. HEAT CONTENT SPECIFICATION = Adhering to the heat content specifications in 40 CFR § 63.11(b)(6)(ii) and the maximum tip velocity specifications in 40 CFR § 63.11(b)(7) or 40 CFR § 63.11(b)(8).	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			FLARE ASSIST TYPE = Air assisted	
858	40 CFR Part 63, Subpart A	63A-002	<p>REQUIRED UNDER 40 CFR 63 = Flare is required by a Subpart under 40 CFR Part 63.</p> <p>HEAT CONTENT SPECIFICATION = Adhering to the heat content specifications in 40 CFR § 63.11(b)(6)(ii) and the maximum tip velocity specifications in 40 CFR § 63.11(b)(7) or 40 CFR § 63.11(b)(8).</p> <p>FLARE ASSIST TYPE = Non-assisted</p> <p>FLARE EXIT VELOCITY = Flare exit velocity is less than 60 ft/s (18.3 m/sec)</p>	
LPFUG	30 TAC Chapter 115, Pet. Refinery & Petrochemicals	R5352-ALL	SOP/GOP Index No. = Owner/Operator assumes VOC fugitive control requirements for all components subject to 30 TAC Chapter 115, Subchapter D, Division 3 with no alternate control or control device.	
LPFUG	40 CFR Part 60, Subpart DDD	60DDD-ALL	<p>FLANGES AND OTHER CONNECTORS (ANY SERVICE) [NSPS DDD] = FLANGES OR CONNECTORS IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>FLARE = USING A FLARE FOR CONTROL</p> <p>MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE</p> <p>OPEN-ENDED VALVES OR LINES (ANY SERVICE) [NSPS DDD] = OPEN-ENDED VALVES OR LINES IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>PRESSURE RELIEF DEVICES IN GAS/VAPOR SERVICE [NSPS DDD] = PRESSURE RELIEF DEVICES IN GAS/VAPOR SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>PUMPS IN LIGHT LIQUID SERVICE [NSPS DDD] = PUMPS IN LIGHT LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE [NSPS DDD] = VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>VAPOR RECOVERY SYSTEM = USING A VAPOR RECOVERY SYSTEM FOR CONTROL</p> <p>CONTINUOUS PROCESS [NSPS DDD] = THE AFFECTED FACILITY IS A CONTINUOUS PROCESS</p> <p>EEL = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>EQUIVALENT EMISSION LIMITATION (EEL)--FLANGES AND OTHER CONNECTORS [NSPS DDD] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>EQUIVALENT EMISSION LIMITATION (EEL)--PUMPS LIGHT LIQUID SERVICE [NSPS DDD] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>40 CFR 60 (NSPS) SUBPART DDD CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE = AFTER SEPTEMBER 30, 1987 AND ON/BEFORE JANUARY 10, 1989</p> <p>COMPLYING WITH § 60.482-2 = YES</p> <p>COMPLYING WITH § 60.482-6 = YES</p> <p>COMPLYING WITH § 60.482-7 = YES</p> <p>COMPLYING WITH § 60.482-8 = YES</p> <p>COMPLYING WITH §60.482-10 = YES</p> <p>40 CFR 60 (NSPS) SUBPART DDD DESIGN CAPACITY = FACILITY HAS DESIGN CAPACITY TO PRODUCE GREATER THAN OR EQUAL TO 1,000 MEGAGRAMS PER YEAR</p> <p>CLOSED VENT SYSTEMS AND CONTROL DEVICES (ANY SERVICE) [NSPS DDD] = CLOSED VENT SYSTEM AND CONTROL DEVICES IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>COMPLYING WITH § 60.482-8 = YES</p> <p>COMPRESSORS (ANY SERVICE) [NSPS DDD] = COMPRESSORS IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>PUMPS IN HEAVY LIQUID SERVICE [NSPS DDD] = PUMPS IN HEAVY LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>VALVES IN HEAVY LIQUID SERVICE [NSPS DDD] = VALVES IN HEAVY LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>ENCLOSED COMBUSTION DEV. = USING AN ENCLOSED COMBUSTION DEVICE FOR CONTROL</p> <p>EQUIPMENT IN VACUUM SERVICE = YES</p> <p>EQUIVALENT EMISSION LIMITATION (EEL)--COMPRESSORS [NSPS DDD] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>EQUIVALENT EMISSION LIMITATION (EEL)--PUMPS HEAVY LIQUID SERVICE [NSPS DDD] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>SAMPLING CONNECTION SYSTEMS (ANY SERVICE) [NSPS DDD] = SAMPLING CONNECTION SYSTEMS IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>EEL = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>EQUIVALENT EMISSION LIMITATION (EEL)--SAMPLING CONNECTION SYSTEMS [NSPS DDD] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>COMPLYING WITH § 60.482-3 = YES</p> <p>COMPLYING WITH § 60.482-8 = YES</p> <p>COMPLYING WITH §60.482-10 = YES</p> <p>COMPLYING WITH § 60.482-5 = YES</p> <p>COMPLYING WITH §60.482-10 = YES</p>	
721V	30 TAC Chapter 115, Vent Gas Controls	R5121-8	<p>Alternate Control Requirement = Alternate control is not used.</p> <p>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.</p> <p>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.</p> <p>Control Device Type = Smokeless flare</p> <p>Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.</p>	
858V	30 TAC Chapter 115, Vent Gas Controls	R5121-8	<p>Alternate Control Requirement = Alternate control is not used.</p> <p>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.</p> <p>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.</p> <p>Control Device Type = Smokeless flare</p> <p>Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			specifically classified under the rule.	
GRPLPVENT4	30 TAC Chapter 115, Vent Gas Controls	R5121-4	<p>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.</p> <p>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.</p> <p>Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>	
GRPLPVENT6	30 TAC Chapter 115, Vent Gas Controls	R5121-4	<p>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.</p> <p>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.</p> <p>Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>	
GRPLPVENT8	30 TAC Chapter 115, Vent Gas Controls	R5121-4	<p>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.</p> <p>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.</p> <p>Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>	
GRPLPVENT9	30 TAC Chapter 115, Vent Gas Controls	R5121-4	<p>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.</p> <p>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.</p> <p>Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.	
LINE 45	40 CFR Part 63, Subpart FFFF	63FFFF-G1CPV	Emission Standard = Alternate emission limit as provided in 40 CFR § 63.2505(a)(1).	
LINE 60	40 CFR Part 63, Subpart FFFF	63FFFF-G1CPV	Emission Standard = Alternate emission limit as provided in 40 CFR § 63.2505(a)(1).	
LINE4	40 CFR Part 63, Subpart FFFF	63FFFF-G2CPV	Emission Standard = Alternate emission limit as provided in 40 CFR § 63.2505(a)(1).	
LINE44	40 CFR Part 63, Subpart FFFF	63FFFF-G1CPV	Emission Standard = Alternate emission limit as provided in 40 CFR § 63.2505(a)(1).	
PROLPMR	40 CFR Part 60, Subpart DDD	60DDD-CVCF	<p>CONTROL OF CONTINUOUS EMISSIONS [NSPS DDD] = ALL CONTINUOUS EMISSIONS ARE CONTROLLED IN AN EXISTING CONTROL DEVICE (AS DEFINED IN 40 CFR 60.561)</p> <p>MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE</p> <p>POLYOLEFIN PRODUCTION [NSPS DDD] = NO POLYOLEFIN OR ONLY ONE POLYOLEFIN IS PRODUCED</p> <p>CONTINUOUS CONTROL DEVICE [NSPS DDD] = FLARE</p> <p>CONTINUOUS PROCESS [NSPS DDD] = AFFECTED FACILITY PROCESS IS CONTINUOUS</p> <p>PROCESS EMISSIONS [NSPS DDD] = INDIVIDUAL VENT GAS STREAMS EMIT CONTINUOUS EMISSIONS</p> <p>CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS DDD] = AFTER JANUARY 10 1989</p> <p>UNCONTROLLED ANNUAL EMISSIONS [NSPS DDD] = UNCONTROLLED ANNUAL EMISSIONS GREATER THAN OR EQUAL TO 1.6 MEGAGRAMS/YEAR (1.76 TONS/YEAR)</p> <p>ANNUAL EMISSIONS ENTERING CONTROL DEVICE [NSPS DDD] = ANNUAL EMISSIONS ENTERING CONTROL DEVICE GREATER THAN OR EQUAL TO CALCULATED THRESHOLD EMISSIONS (CTE) LEVELS CALCULATED IN 'TABLE 3'</p> <p>EXPERIMENTAL PROCESS LINE [NSPS DDD] = AFFECTED FACILITY IS NOT AN EXPERIMENTAL PROCESS LINE</p> <p>WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS [NSPS DDD] = WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS GREATER THAN OR EQUAL TO 0.10%</p>	
PROLPMR	40 CFR Part 60, Subpart DDD	60DDD-IVCF	<p>EMERGENCY VENT [NSPS DDD] = EMISSIONS ARE NOT AN EMERGENCY VENT STREAM FROM A NEW MODIFIED OR RECONSTRUCTED FACILITY</p> <p>MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE</p> <p>POLYOLEFIN PRODUCTION [NSPS DDD] = NO POLYOLEFIN OR ONLY ONE POLYOLEFIN IS PRODUCED</p> <p>CONTINUOUS PROCESS [NSPS DDD] = AFFECTED FACILITY PROCESS IS CONTINUOUS</p> <p>EXISTING CONTROL DEVICE [NSPS DDD] = VENT STREAM IS CONTROLLED IN AN EXISTING CONTROL DEVICE (AS DEFINED IN 40 CFR 60.561) WHICH HAS NOT BEEN RECONSTRUCTED REPLACED OR ITS OPERATING CONDITIONS MODIFIED AS A RESULT OF STATE OR LOCAL REGULATIONS</p> <p>PROCESS EMISSIONS [NSPS DDD] = INDIVIDUAL VENT GAS STREAMS EMIT INTERMITTENT EMISSIONS</p> <p>CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS DDD] = AFTER JANUARY 10 1989</p> <p>EXPERIMENTAL PROCESS LINE [NSPS DDD] = AFFECTED FACILITY IS NOT AN EXPERIMENTAL PROCESS LINE</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
PROLPPF4AB	40 CFR Part 60, Subpart DDD	60DDD-CVCF	<p>CONTROL OF CONTINUOUS EMISSIONS [NSPS DDD] = ALL CONTINUOUS EMISSIONS ARE CONTROLLED IN AN EXISTING CONTROL DEVICE (AS DEFINED IN 40 CFR 60.561)</p> <p>MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE</p> <p>POLYOLEFIN PRODUCTION [NSPS DDD] = NO POLYOLEFIN OR ONLY ONE POLYOLEFIN IS PRODUCED</p> <p>CONTINUOUS CONTROL DEVICE [NSPS DDD] = FLARE</p> <p>CONTINUOUS PROCESS [NSPS DDD] = AFFECTED FACILITY PROCESS IS CONTINUOUS</p> <p>PROCESS EMISSIONS [NSPS DDD] = INDIVIDUAL VENT GAS STREAMS EMIT CONTINUOUS EMISSIONS</p> <p>CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS DDD] = AFTER JANUARY 10 1989</p> <p>UNCONTROLLED ANNUAL EMISSIONS [NSPS DDD] = UNCONTROLLED ANNUAL EMISSIONS GREATER THAN OR EQUAL TO 1.6 MEGAGRAMS/YEAR (1.76 TONS/YEAR)</p> <p>ANNUAL EMISSIONS ENTERING CONTROL DEVICE [NSPS DDD] = ANNUAL EMISSIONS ENTERING CONTROL DEVICE GREATER THAN OR EQUAL TO CALCULATED THRESHOLD EMISSIONS (CTE) LEVELS CALCULATED IN 'TABLE 3'</p> <p>EXPERIMENTAL PROCESS LINE [NSPS DDD] = AFFECTED FACILITY IS NOT AN EXPERIMENTAL PROCESS LINE</p> <p>WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS [NSPS DDD] = WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS GREATER THAN OR EQUAL TO 0.10%</p>	
PROLPPF4AB	40 CFR Part 60, Subpart DDD	60DDD-CVU1	<p>CONTROL OF CONTINUOUS EMISSIONS [NSPS DDD] = ALL VENT GAS STREAMS ARE UNCONTROLLED</p> <p>MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE</p> <p>POLYOLEFIN PRODUCTION [NSPS DDD] = NO POLYOLEFIN OR ONLY ONE POLYOLEFIN IS PRODUCED</p> <p>CONTINUOUS PROCESS [NSPS DDD] = AFFECTED FACILITY PROCESS IS CONTINUOUS</p> <p>PROCESS EMISSIONS [NSPS DDD] = INDIVIDUAL VENT GAS STREAMS EMIT CONTINUOUS EMISSIONS</p> <p>CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS DDD] = AFTER JANUARY 10 1989</p> <p>UNCONTROLLED ANNUAL EMISSIONS [NSPS DDD] = UNCONTROLLED ANNUAL EMISSIONS LESS THAN 1.6 MEGAGRAMS/YEAR (1.76 TONS/YEAR)</p> <p>EXPERIMENTAL PROCESS LINE [NSPS DDD] = AFFECTED FACILITY IS NOT AN EXPERIMENTAL PROCESS LINE</p> <p>WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS [NSPS DDD] = WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS GREATER THAN OR EQUAL TO 0.10%</p>	
PROLPPF4AB	40 CFR Part 60, Subpart DDD	60DDD-CVU2	<p>CONTROL OF CONTINUOUS EMISSIONS [NSPS DDD] = ALL VENT GAS STREAMS ARE UNCONTROLLED</p> <p>MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE</p> <p>POLYOLEFIN PRODUCTION [NSPS DDD] = NO POLYOLEFIN OR ONLY ONE POLYOLEFIN IS PRODUCED</p> <p>CONTINUOUS PROCESS [NSPS DDD] = AFFECTED FACILITY PROCESS IS CONTINUOUS</p> <p>PROCESS EMISSIONS [NSPS DDD] = INDIVIDUAL VENT GAS STREAMS EMIT CONTINUOUS EMISSIONS</p> <p>CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS DDD] = AFTER JANUARY 10 1989</p> <p>UNCONTROLLED ANNUAL EMISSIONS [NSPS DDD] = UNCONTROLLED ANNUAL EMISSIONS GREATER THAN OR EQUAL TO 1.6 MEGAGRAMS/YEAR (1.76 TONS/YEAR)</p> <p>EXPERIMENTAL PROCESS LINE [NSPS DDD] = AFFECTED FACILITY IS NOT AN EXPERIMENTAL PROCESS LINE</p> <p>WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS [NSPS DDD] = WEIGHT PERCENT TOTAL ORGANIC</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			COMPOUNDS GREATER THAN OR EQUAL TO 0.10% 'TABLE 3' CONTROL REQUIREMENTS [NSPS DDD] = CALCULATIONS FROM 'TABLE 3' DO NOT REQUIRE CONTROLS	
PROLPRMP	40 CFR Part 60, Subpart DDD	60DDD-CVCF	CONTROL OF CONTINUOUS EMISSIONS [NSPS DDD] = ALL CONTINUOUS EMISSIONS ARE CONTROLLED IN AN EXISTING CONTROL DEVICE (AS DEFINED IN 40 CFR 60.561) MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE POLYOLEFIN PRODUCTION [NSPS DDD] = NO POLYOLEFIN OR ONLY ONE POLYOLEFIN IS PRODUCED CONTINUOUS CONTROL DEVICE [NSPS DDD] = FLARE CONTINUOUS PROCESS [NSPS DDD] = AFFECTED FACILITY PROCESS IS CONTINUOUS PROCESS EMISSIONS [NSPS DDD] = INDIVIDUAL VENT GAS STREAMS EMIT CONTINUOUS EMISSIONS CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS DDD] = AFTER SEPTEMBER 30 1987 AND ON/BEFORE JANUARY 10 1989 UNCONTROLLED ANNUAL EMISSIONS [NSPS DDD] = UNCONTROLLED ANNUAL EMISSIONS GREATER THAN OR EQUAL TO 1.6 MEGAGRAMS/YEAR (1.76 TONS/YEAR) ANNUAL EMISSIONS ENTERING CONTROL DEVICE [NSPS DDD] = ANNUAL EMISSIONS ENTERING CONTROL DEVICE GREATER THAN OR EQUAL TO CALCULATED THRESHOLD EMISSIONS (CTE) LEVELS CALCULATED IN 'TABLE 3' EXPERIMENTAL PROCESS LINE [NSPS DDD] = AFFECTED FACILITY IS NOT AN EXPERIMENTAL PROCESS LINE WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS [NSPS DDD] = WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS GREATER THAN OR EQUAL TO 0.10% MODIFIED AFTER APPLICATION DATE [NSPS DDD] = AFFECTED FACILITY MODIFIED OR RECONSTRUCTED AFTER APPLICAILITY DATE 'TABLE 2' THRESHOLD EMISSION RATES [NSPS DDD] = UNCONTROLLED EMISSION RATE GREATER THAN TO UNCONTROLLED THRESHOLD EMISSION RATES IN 'TABLE 2' OF 40 CFR 60.560	
PROLPRMP	40 CFR Part 60, Subpart DDD	60DDD-IVCF	EMERGENCY VENT [NSPS DDD] = EMISSIONS ARE NOT AN EMERGENCY VENT STREAM FROM A NEW MODIFIED OR RECONSTRUCTED FACILITY MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE POLYOLEFIN PRODUCTION [NSPS DDD] = NO POLYOLEFIN OR ONLY ONE POLYOLEFIN IS PRODUCED CONTINUOUS PROCESS [NSPS DDD] = AFFECTED FACILITY PROCESS IS CONTINUOUS EXISTING CONTROL DEVICE [NSPS DDD] = VENT STREAM IS CONTROLLED NOT IN AN EXISTING CONTROL DEVICE (AS DEFINED IN 40 CFR 60.561) WHICH HAS NOT BEEN RECONSTRUCTED REPLACED OR ITS OPERATING CONDITIONS MODIFIED AS A RESULT OF STATE OR LOCAL REGULATIONS PROCESS EMISSIONS [NSPS DDD] = INDIVIDUAL VENT GAS STREAMS EMIT INTERMITTENT EMISSIONS CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS DDD] = AFTER SEPTEMBER 30 1987 AND ON/BEFORE JANUARY 10 1989 INTERMITTENT CONTROL DEVICE [NSPS DDD] = FLARE EXPERIMENTAL PROCESS LINE [NSPS DDD] = AFFECTED FACILITY IS NOT AN EXPERIMENTAL PROCESS LINE MODIFIED AFTER APPLICATION DATE [NSPS DDD] = AFFECTED FACILITY MODIFIED OR RECONSTRUCTED AFTER APPLICAILITY DATE 'TABLE 2' THRESHOLD EMISSION RATES [NSPS DDD] = UNCONTROLLED EMISSION RATE GREATER	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
PROLPRMP	40 CFR Part 60, Subpart DDD	6oDDD-IVU	<p>THAN TO UNCONTROLLED THRESHOLD EMISSION RATES IN "TABLE 2" OF 40 CFR 60.560</p> <p>MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE POLYOLEFIN PRODUCTION [NSPS DDD] = NO POLYOLEFIN OR ONLY ONE POLYOLEFIN IS PRODUCED CONTINUOUS PROCESS [NSPS DDD] = AFFECTED FACILITY PROCESS IS CONTINUOUS CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS DDD] = AFTER SEPTEMBER 30 1987 AND ON/BEFORE JANUARY 10 1989 EXPERIMENTAL PROCESS LINE [NSPS DDD] = AFFECTED FACILITY IS NOT AN EXPERIMENTAL PROCESS LINE MODIFIED AFTER APPLICATION DATE [NSPS DDD] = AFFECTED FACILITY MODIFIED OR RECONSTRUCTED AFTER APPLICAILITY DATE "TABLE 2" THRESHOLD EMISSION RATES [NSPS DDD] = UNCONTROLLED EMISSION RATE LESS THAN OR EQUAL TO UNCONTROLLED THRESHOLD EMISSION RATES IN "TABLE 2" OF 40 CFR 60.560</p>	
PROLPRX6o	40 CFR Part 60, Subpart DDD	6oDDD-EV	<p>EMERGENCY VENT [NSPS DDD] = EMISSIONS ARE AN EMERGENCY VENT STREAM FROM A NEW MODIFIED OR RECONSTRUCTED FACILITY MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE POLYOLEFIN PRODUCTION [NSPS DDD] = NO POLYOLEFIN OR ONLY ONE POLYOLEFIN IS PRODUCED CONTINUOUS PROCESS [NSPS DDD] = AFFECTED FACILITY PROCESS IS CONTINUOUS</p> <p>PROCESS EMISSIONS [NSPS DDD] = INDIVIDUAL VENT GAS STREAMS EMIT INTERMITTENT EMISSIONS CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS DDD] = AFTER SEPTEMBER 30 1987 AND ON/BEFORE JANUARY 10 1989 EXPERIMENTAL PROCESS LINE [NSPS DDD] = AFFECTED FACILITY IS NOT AN EXPERIMENTAL PROCESS LINE MODIFIED AFTER APPLICATION DATE [NSPS DDD] = AFFECTED FACILITY MODIFIED OR RECONSTRUCTED AFTER APPLICAILITY DATE "TABLE 2" THRESHOLD EMISSION RATES [NSPS DDD] = UNCONTROLLED EMISSION RATE LESS THAN OR EQUAL TO UNCONTROLLED THRESHOLD EMISSION RATES IN "TABLE 2" OF 40 CFR 60.560</p>	
PROLPRX6o	40 CFR Part 60, Subpart DDD	6oDDD-IVCF	<p>EMERGENCY VENT [NSPS DDD] = EMISSIONS ARE NOT AN EMERGENCY VENT STREAM FROM A NEW MODIFIED OR RECONSTRUCTED FACILITY MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE POLYOLEFIN PRODUCTION [NSPS DDD] = NO POLYOLEFIN OR ONLY ONE POLYOLEFIN IS PRODUCED CONTINUOUS PROCESS [NSPS DDD] = AFFECTED FACILITY PROCESS IS CONTINUOUS</p> <p>EXISTING CONTROL DEVICE [NSPS DDD] = VENT STREAM IS CONTROLLED NOT IN AN EXISTING CONTROL DEVICE (AS DEFINED IN 40 CFR 60.561) WHICH HAS NOT BEEN RECONSTRUCTED REPLACED OR ITS OPERATING CONDITIONS MODIFIED AS A RESULT OF STATE OR LOCAL REGULATIONS PROCESS EMISSIONS [NSPS DDD] = INDIVIDUAL VENT GAS STREAMS EMIT INTERMITTENT EMISSIONS CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS DDD] = AFTER SEPTEMBER 30 1987 AND ON/BEFORE JANUARY 10 1989 INTERMITTENT CONTROL DEVICE [NSPS DDD] = FLARE EXPERIMENTAL PROCESS LINE [NSPS DDD] = AFFECTED FACILITY IS NOT AN EXPERIMENTAL PROCESS LINE</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			MODIFIED AFTER APPLICATION DATE [NSPS DDD] = AFFECTED FACILITY MODIFIED OR RECONSTRUCTED AFTER APPLICAILITY DATE 'TABLE 2' THRESHOLD EMISSION RATES [NSPS DDD] = UNCONTROLLED EMISSION RATE GREATER THAN TO UNCONTROLLED THRESHOLD EMISSION RATES IN 'TABLE 2' OF 40 CFR 60.560	

* - The "unit attributes" or operating conditions that determine what requirements apply

** - Notes changes made to the automated results from the DSS, and a brief explanation why

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

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.: 8758	Issuance Date: 05/17/2013
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: 11/01/2001
Number: 106.433	Version No./Date: 09/04/2000
Number: 106.452	Version No./Date: 09/04/2000
Number: 83	Version No./Date: 01/11/1985

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.

Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected

Periodic Monitoring:

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

Unit/Group/Process Information	
ID No.: 612-D4718	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-0097
Pollutant: VOC	Main Standard: § 115.112(a)(1)
Monitoring Information	
Indicator: Pilot flame	
Minimum Frequency: Once per hour	
Averaging Period: N/A	
Deviation Limit: Loss of all pilots on flare	
Basis of monitoring: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.	

Unit/Group/Process Information	
ID No.: 612-D4723	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-0097
Pollutant: VOC	Main Standard: § 115.112(a)(1)
Monitoring Information	
Indicator: Pilot flame	
Minimum Frequency: Once per hour	
Averaging Period: N/A	
Deviation Limit: Loss of all pilots on flare	
<p>Basis of monitoring: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.</p>	

Unit/Group/Process Information	
ID No.: 612-D4725	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-0097
Pollutant: VOC	Main Standard: § 115.112(a)(1)
Monitoring Information	
Indicator: Pilot flame	
Minimum Frequency: Once per hour	
Averaging Period: N/A	
Deviation Limit: Loss of all pilots on flare	
<p>Basis of monitoring: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.</p>	

Unit/Group/Process Information	
ID No.: 612-D4749	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-0132
Pollutant: VOC	Main Standard: § 115.112(a)(1)
Monitoring Information	
Indicator: Pilot flame	
Minimum Frequency: Once per hour	
Averaging Period: N/A	
Deviation Limit: Loss of all pilots on flare	
<p>Basis of monitoring: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.</p>	

Unit/Group/Process Information	
ID No.: 612-D4749	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb-0081
Pollutant: VOC	Main Standard: § 60.112b(b)(1)
Monitoring Information	
Indicator: Indication of a leak in CVS components	
Minimum Frequency: Annually	
Averaging Period: n/a	
Deviation Limit: Failure to repair leaks as required.	
<p>Basis of monitoring: It is widely practiced and accepted to use work practice as a monitoring option to demonstrate compliance. Preventive maintenance and visual inspections of control equipment, as recommended by the manufacturer, conducted by the owner or operator can ensure that the unit is operating properly. The work practice requirements prescribe that preventive maintenance and/or visual inspections be performed and recorded in a log. This option assures that the owner or operator is adequately maintaining the control equipment.</p>	

Unit/Group/Process Information	
ID No.: 612-D4752	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-0097
Pollutant: VOC	Main Standard: § 115.112(a)(1)
Monitoring Information	
Indicator: Pilot flame	
Minimum Frequency: Once per hour	
Averaging Period: N/A	
Deviation Limit: Loss of all pilots on flare	
<p>Basis of monitoring: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.</p>	

Unit/Group/Process Information	
ID No.: 612-D4754	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-0097
Pollutant: VOC	Main Standard: § 115.112(a)(1)
Monitoring Information	
Indicator: Pilot flame	
Minimum Frequency: Once per hour	
Averaging Period: N/A	
Deviation Limit: Loss of all pilots of flare	
<p>Basis of monitoring: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.</p>	

Unit/Group/Process Information	
ID No.: 612-D4758	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-0132
Pollutant: VOC	Main Standard: § 115.112(a)(1)
Monitoring Information	
Indicator: Pilot flame	
Minimum Frequency: Once per hour	
Averaging Period: N/A	
Deviation Limit: Loss of all pilots on flare	
<p>Basis of monitoring: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.</p>	

Unit/Group/Process Information	
ID No.: 612-D4758	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb-0081
Pollutant: VOC	Main Standard: § 60.112b(b)(1)
Monitoring Information	
Indicator: Indication of a leak in CVS components	
Minimum Frequency: Annually	
Averaging Period: n/a	
Deviation Limit: Failure to repair leaks as required.	
<p>Basis of monitoring: It is widely practiced and accepted to use work practice as a monitoring option to demonstrate compliance. Preventive maintenance and visual inspections of control equipment, as recommended by the manufacturer, conducted by the owner or operator can ensure that the unit is operating properly. The work practice requirements prescribe that preventive maintenance and/or visual inspections be performed and recorded in a log. This option assures that the owner or operator is adequately maintaining the control equipment.</p>	

Compliance Assurance Monitoring (CAM):

Compliance Assurance Monitoring (CAM) is a federal monitoring program established under Title 40 Code of Federal Regulations Part 64 (40 CFR Part 64).

Emission units are subject to CAM requirements if they meet the following criteria:

1. the emission unit is subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement;
2. the emission unit uses a control device to achieve compliance with the emission limitation or standard specified in the applicable requirement; and
3. the emission unit has the pre-control device potential to emit greater than or equal to the amount in tons per year for a site to be classified as a major source.

The following table(s) identify the emission unit(s) that are subject to CAM:

Unit/Group/Process Information	
ID No.: 721V	
Control Device ID No.: 721	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R5121-8
Pollutant: VOC	Main Standard: § 115.121(a)(1)
Monitoring Information	
Indicator: Pilot flame	
Minimum Frequency: Continuous	
Averaging Period: N/A	
Deviation Limit: Loss of all pilots on flare	
Basis of CAM: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.	

Unit/Group/Process Information	
ID No.: 858V	
Control Device ID No.: 858	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R5121-8
Pollutant: VOC	Main Standard: § 115.121(a)(1)
Monitoring Information	
Indicator: Pilot flame	
Minimum Frequency: Continuous	
Averaging Period: N/A	
Deviation Limit: Loss of all pilots on flare	
Basis of CAM: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.	

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