

Statement of Basis of the Federal Operating Permit

Ascend Performance Materials Inc.

Site/Area Name: Distribution

Physical location: FM 2917 approximately 8 miles south of the intersection of TX Hwy. 35 and F.M. 2917

Nearest City: Alvin

County: Brazoria

Permit Number: O2323

Project Type: Prior Approval Requested Revision

Standard Industrial Classification (SIC) Code: 2869

SIC Name: Industrial Organic Chemicals

This Statement of Basis sets forth the legal and factual basis for the draft changes to the permit conditions resulting from the prior approval requested 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.

Prepared on: November 1, 2013

Operating Permit Basis of Determination

Description of Revisions

Ascend submitted a minor revision application on June 20, 2013 to incorporate the changes to New Source Review Permit No. 38998 for the permitting of maintenance, startup, and shutdown emissions. NSR Permit No. 38998 was amended on January 6, 2011 to authorize the MSS activities. At the request of the permit reviewer, the applicant provided the issuance date for several NSR authorizations. The rest of the FOP remains unaffected and includes Site-wide Terms and Conditions, which were identified using information provided by the applicant in Form OP-REQ1, and Unit Specific Terms and Conditions, which were identified using information provided by the applicant in various forms (Forms OP-SUM, OP-REQ2, OP-REQ3, and various Unit Attribute tables) from previous permit actions.

Permit Area Process Description

The raw materials (feedstock) are fed from storage tanks to the production units (AN-2, -3, and -7) which in turn send AN to product storage tank. The AN unit also produces off-spec AN, crude AN, and recycle water, whose respective storage tanks are controlled by absorbers. Wastewater from the AN production units is stored in two tanks.

Two wastewater streams generated by the AN production units are stored in four tanks: two for each wastewater stream. One set of wastewater tanks vent back to the production unit for destruction in a waste heat boiler. The other set of wastewater tanks is vented to the atmosphere.

Finally, AN is sent off-site via barge or railcar. VOC fugitive emissions associated with piping components (valves, flanges, pumps, etc.) in the tank storage areas are included in this permit.

Each loadout facility's emissions are controlled by incinerators. The vapor collection system for the marine loading is conducted under negative pressure. Nitrogen is added to the vapor stream just after barge recovery to meet the specifications of the incinerators. Vapor recovery is utilized at the railcar loading facility as well, though not operated under negative pressure.

In additions to the AN loading, the barge loading equipment is also used for handling products from an adjacent Equistar plant. Emissions associated with the barge loading of Equistar products are included in this application. These products are as follows: benzene, MTBE, PYgas, toluene, UDEX Raffinate (Raffi), ethylbenzene, DCPD and drip oil.

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: O1258, O2317, O2318, O2321, O2322, O2324, O2325

Major Source Pollutants

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

Major Pollutants	HAPS
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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)(A) and (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 before January 31, 1972 which are limited, over a six-minute average, to 30% opacity as required by 30 TAC § 111.111(a)(1)(A). 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)(A) to verify compliance with the 30% opacity limit and Special Term and Condition 3.B. 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 30% opacity standard of 30 TAC § 111.111(a)(1)(A) and 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)(A) and 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)	Yes
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*
332Z13	30 TAC Chapter 117, Subchapter B	R7300-1	<p>Horsepower Rating = GOP 150+ hp</p> <p>RACT Date Placed in Service = After June 9, 1993 and on or after the final compliance date specified in 30 TAC §§ 117.9000, 117.9010 or 117.9020</p> <p>Functionally Identical Replacement = Unit is not a functionally identical replacement</p> <p>Type of Service = New, modified, reconstructed or relocated diesel fuel-fired engine, placed into service on or after October 1, 2001, located in the Houston/Galveston/Brazoria ozone nonattainment area, operated less than 100 hours/year, on a rolling 12-month average</p>
T320T301-1	30 TAC Chapter 115, Storage of VOCs	R5112-22	<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 an internal floating roof (IFR)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Primary Seal = Liquid-mounted foam</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Secondary Seal = Secondary seal not determined since 30 TAC §§ 115.117(a)(4) or 115.117(b)(4) exemption is not utilized</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p>
T320T301-1	40 CFR Part 63, Subpart G	63G-18	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>Seal Type = Liquid-mounted seal (as defined in 40 CFR § 63.111)</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> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Emission Control Type = Internal floating roof</p>
T320T301-2	30 TAC Chapter 115, Storage of VOCs	R5112-23	<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 an internal floating roof (IFR)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Primary Seal = Liquid-mounted foam</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Secondary Seal = Secondary seal not determined since 30 TAC §§ 115.117(a)(4) or 115.117(b)(4) exemption is not utilized</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p>
T320T301-2	40 CFR Part 63, Subpart G	63G-19	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>Seal Type = Liquid-mounted seal (as defined in 40 CFR § 63.111)</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> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Emission Control Type = Internal floating roof</p>

Unit ID	Regulation	Index Number	Basis of Determination*
T320T301-3	30 TAC Chapter 115, Storage of VOCs	R5112-24	<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 an internal floating roof (IFR)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Primary Seal = Liquid-mounted foam</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Secondary Seal = Secondary seal not determined since 30 TAC §§ 115.117(a)(4) or 115.117(b)(4) exemption is not utilized</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p>
T320T301-3	40 CFR Part 63, Subpart G	63G-20	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>Seal Type = Liquid-mounted seal (as defined in 40 CFR § 63.111)</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> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Emission Control Type = Internal floating roof</p>
T320T302	30 TAC Chapter 115, Storage of VOCs	R5112-25	<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 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>
T320T302	40 CFR Part 63, Subpart G	63G-21	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>Closed Vent System = Closed vent system is routing emissions to a process or fuel gas system, or is subject to § 63.148 of Subpart G</p> <p>NESHAP Subpart Y Applicability = The unit is subject to 40 CFR Part 61, Subpart Y.</p> <p>Hard Piping = The closed vent system is constructed of hard piping.</p> <p>Bypass Lines = Closed vent system has by-pass lines that are sealed with a carseal or lock and key mechanism</p> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Control Device Type = Control device other than a flare, thermal incinerator, boiler, process heater, enclosed combustion device meeting residence time and temperature requirements, carbon adsorber, condenser or hazardous waste incinerator.</p> <p>Emission Control Type = Closed vent system (CVS) and control device (fixed roof)</p> <p>Control Device Design = The control device was not installed on or before December 31, 1992 or was not designed to reduce inlet emissions of total organic hazardous air pollutants by greater than or equal to 90% and less than 95%.</p> <p>Design Evaluation Submitted = A design evaluation of the emission control system was submitted to demonstrate compliance with 40 CFR § 63.119(e).</p>
T320T302	40 CFR Part 63, Subpart G	63G-21a	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>Closed Vent System = Closed vent system is routing emissions to a process or fuel gas system, or is subject to § 63.148 of Subpart G</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>NESHAP Subpart Y Applicability = The unit is subject to 40 CFR Part 61, Subpart Y.</p> <p>Hard Piping = The closed vent system is constructed of hard piping.</p> <p>Bypass Lines = Closed vent system has by-pass lines that are sealed with a carseal or lock and key mechanism</p> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Control Device Type = Control device other than a flare, thermal incinerator, boiler, process heater, enclosed combustion device meeting residence time and temperature requirements, carbon adsorber, condenser or hazardous waste incinerator.</p> <p>Emission Control Type = Closed vent system (CVS) and control device (fixed roof)</p> <p>Control Device Design = The control device was not installed on or before December 31, 1992 or was not designed to reduce inlet emissions of total organic hazardous air pollutants by greater than or equal to 90% and less than 95%.</p> <p>Design Evaluation Submitted = A design evaluation of the emission control system was submitted to demonstrate compliance with 40 CFR § 63.119(e).</p>
T320T311-1	30 TAC Chapter 115, Storage of VOCs	R5112-26	<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 an internal floating roof (IFR)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Primary Seal = Liquid-mounted foam</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Secondary Seal = Secondary seal not determined since 30 TAC §§ 115.117(a)(4) or 115.117(b)(4) exemption is not utilized</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p>
T320T311-1	40 CFR Part 63, Subpart G	63G-22	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>Seal Type = Liquid-mounted seal (as defined in 40 CFR § 63.111)</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> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Emission Control Type = Internal floating roof</p>
T320T311-2	30 TAC Chapter 115, Storage of VOCs	R5112-27	<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 an internal floating roof (IFR)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Primary Seal = Liquid-mounted foam</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Secondary Seal = Secondary seal not determined since 30 TAC §§ 115.117(a)(4) or 115.117(b)(4) exemption is not utilized</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p>
T320T311-2	40 CFR Part 63, Subpart G	63G-23	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>Seal Type = Liquid-mounted seal (as defined in 40 CFR § 63.111)</p> <p>NESHAP Subpart Y Applicability = The unit is subject to 40 CFR Part 61, Subpart Y.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>NSPS Subpart Kb Applicability = The unit is subject to 40 CFR Part 60, Subpart Kb.</p> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Emission Control Type = Internal floating roof</p>
T320T311-3	30 TAC Chapter 115, Storage of VOCs	R5112-28	<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 an internal floating roof (IFR)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Primary Seal = Liquid-mounted foam</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Secondary Seal = Secondary seal not determined since 30 TAC §§ 115.117(a)(4) or 115.117(b)(4) exemption is not utilized</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p>
T320T311-3	40 CFR Part 63, Subpart G	63G-24	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>Seal Type = Liquid-mounted seal (as defined in 40 CFR § 63.111)</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> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Emission Control Type = Internal floating roof</p>
T320T312	30 TAC Chapter 115, Storage of VOCs	R5112-29	<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 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>
T320T312	40 CFR Part 63, Subpart G	63G-25	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>Closed Vent System = Closed vent system is routing emissions to a process or fuel gas system, or is subject to § 63.148 of Subpart G</p> <p>NESHAP Subpart Y Applicability = The unit is subject to 40 CFR Part 61, Subpart Y.</p> <p>Hard Piping = The closed vent system is constructed of hard piping.</p> <p>Bypass Lines = Closed vent system has by-pass lines that are sealed with a carseal or lock and key mechanism</p> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Control Device Type = Control device other than a flare, thermal incinerator, boiler, process heater, enclosed combustion device meeting residence time and temperature requirements, carbon adsorber, condenser or hazardous waste incinerator.</p> <p>Emission Control Type = Closed vent system (CVS) and control device (fixed roof)</p> <p>Control Device Design = The control device was not installed on or before December 31, 1992 or was not designed to reduce inlet emissions of total organic hazardous air pollutants by greater than or equal to 90% and less than 95%.</p> <p>Design Evaluation Submitted = A design evaluation of the emission control system was submitted to demonstrate compliance with 40 CFR § 63.119(e).</p>

Unit ID	Regulation	Index Number	Basis of Determination*
T320T312	40 CFR Part 63, Subpart G	63G-25a	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>Closed Vent System = Closed vent system is routing emissions to a process or fuel gas system, or is subject to § 63.148 of Subpart G</p> <p>NESHAP Subpart Y Applicability = The unit is subject to 40 CFR Part 61, Subpart Y.</p> <p>Hard Piping = The closed vent system is constructed of hard piping.</p> <p>Bypass Lines = Closed vent system has by-pass lines that are sealed with a carseal or lock and key mechanism</p> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Control Device Type = Control device other than a flare, thermal incinerator, boiler, process heater, enclosed combustion device meeting residence time and temperature requirements, carbon adsorber, condenser or hazardous waste incinerator.</p> <p>Emission Control Type = Closed vent system (CVS) and control device (fixed roof)</p> <p>Control Device Design = The control device was not installed on or before December 31, 1992 or was not designed to reduce inlet emissions of total organic hazardous air pollutants by greater than or equal to 90% and less than 95%.</p> <p>Design Evaluation Submitted = A design evaluation of the emission control system was submitted to demonstrate compliance with 40 CFR § 63.119(e).</p>
T320T315	30 TAC Chapter 115, Storage of VOCs	R5112-30	<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 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>
T320T315	40 CFR Part 63, Subpart G	63G-26	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>Closed Vent System = Closed vent system is routing emissions to a process or fuel gas system, or is subject to § 63.148 of Subpart G</p> <p>NESHAP Subpart Y Applicability = The unit is subject to 40 CFR Part 61, Subpart Y.</p> <p>Hard Piping = The closed vent system is constructed of hard piping.</p> <p>Bypass Lines = Closed vent system has by-pass lines that are sealed with a carseal or lock and key mechanism</p> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Control Device Type = Control device other than a flare, thermal incinerator, boiler, process heater, enclosed combustion device meeting residence time and temperature requirements, carbon adsorber, condenser or hazardous waste incinerator.</p> <p>Emission Control Type = Closed vent system (CVS) and control device (fixed roof)</p> <p>Control Device Design = The control device was installed on or before December 31, 1992 and was designed to reduce inlet emissions of total organic hazardous air pollutants by greater than or equal to 90% and less than 95%.</p> <p>Design Evaluation Submitted = Results of a performance test was submitted to demonstrate compliance with 40 CFR § 63.119(e).</p>
T320T315	40 CFR Part 63, Subpart G	63G-26a	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>Closed Vent System = Closed vent system is routing emissions to a process or fuel gas system, or is subject to § 63.148 of Subpart G</p> <p>NESHAP Subpart Y Applicability = The unit is subject to 40 CFR Part 61, Subpart Y.</p> <p>Hard Piping = The closed vent system is constructed of hard piping.</p> <p>Bypass Lines = Closed vent system has by-pass lines that are sealed with a carseal or lock and key mechanism</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Control Device Type = Control device other than a flare, thermal incinerator, boiler, process heater, enclosed combustion device meeting residence time and temperature requirements, carbon adsorber, condenser or hazardous waste incinerator.</p> <p>Emission Control Type = Closed vent system (CVS) and control device (fixed roof)</p> <p>Control Device Design = The control device was installed on or before December 31, 1992 and was designed to reduce inlet emissions of total organic hazardous air pollutants by greater than or equal to 90% and less than 95%.</p> <p>Design Evaluation Submitted = Results of a performance test was submitted to demonstrate compliance with 40 CFR § 63.119(e).</p>
T320T831	30 TAC Chapter 115, Storage of VOCs	R5112-34	<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 an internal floating roof (IFR)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Primary Seal = Liquid-mounted liquid filled</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Secondary Seal = Secondary seal not determined since 30 TAC §§ 115.117(a)(4) or 115.117(b)(4) exemption is not utilized</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p>
T320T831	40 CFR Part 63, Subpart G	63G-27	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>Seal Type = Liquid-mounted seal (as defined in 40 CFR § 63.111)</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> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Emission Control Type = Internal floating roof</p>
322H4	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-2	<p>30 TAC CHAPTER 115 (REG V) CONTROL DEVICE TYPE = Vapor control system with a direct flame incinerator.</p> <p>30 TAC CHAPTER 115 (REG V) FACILITY TYPE = Marine terminal</p> <p>ALTERNATE CONTROL REQUIREMENT (ACR) [REG V] = No alternate control requirements are being utilized.</p> <p>PRODUCT TRANSFERRED = Volatile organic compounds other than liquefied petroleum gas and gasoline.</p> <p>MARINE TERMINAL EXEMPTIONS = The marine terminal is not claiming one or more of the exemptions in 30 TAC § 115.217(a)(5)(B).</p> <p>TRANSFER TYPE = Loading and unloading.</p> <p>TRUE VAPOR PRESSURE [REG V] = True vapor pressure greater than or equal to 0.5 psia.</p> <p>DAILY THROUGHPUT [REG V] = Daily throughput not determined since 30 TAC § 115.217(a)(2)(B), (b)(3)(B), (a)(2)(A), and (b)(3)(A) exemptions do not apply to marine terminals or gasoline terminals.</p> <p>CONTROL OPTIONS = Vapor control system that maintains a control efficiency of at least 90%.</p>
322H4	40 CFR Part 61, Subpart BB	656	<p>NEGATIVE APPLICABILITY [NESHAP BB] = The loading rack loads materials other than benzene-laden waste, gasoline, crude oil, natural gas liquids, petroleum distillates or benzene-laden liquid from a coke by-product plant.</p> <p>BENZENE BY WEIGHT [NESHAP BB] = Concentration of benzene by weight in the liquid which is loaded is greater than or equal to 70% benzene by weight.</p> <p>ANNUAL AMOUNT LOADED [NESHAP BB] = Annual amount loaded is greater than or equal to 1.3 million liters (343,424 gallons).</p> <p>LOADING LOCATION [NESHAP BB] = Marine loading only.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			40 CFR 61 (NESHAP) BB CONTROL DEVICE TYPE = Incinerator other than a catalytic incinerator. INTERMITTENT CONTROL DEVICE [NESHAP BB] = The control device operates intermittently. DIVERTED GAS STREAM [NESHAP BB] = The vent gas stream cannot be diverted from the control device.
322H4	40 CFR Part 63, Subpart Y	63Y-1	SUBPART Y FACILITY TYPE = Existing onshore loading terminal (located onshore or less than 0.5 miles from shore). BALLASTING OPERATIONS = Operations other than or in addition to ballasting operations are performed at the facility. VAPOR PRESSURE = Vapor pressure is greater than or equal to 10.3 kilopascals (1.5 psia) at standard conditions, 20° C and 760 mm Hg. SUBPART BB APPLICABILITY = Marine vessel loading operations are not subject to and complying with 40 CFR Part 61, Subpart BB. MATERIAL LOADED = Material other than crude oil or gasoline. HAP IMPURITIES ONLY = Marine vessel loading operations at loading berths transfer liquids containing organic hazardous air pollutants other than as impurities. SOURCE EMISSIONS = Source with emissions less than 10 and 25 tons.
323THRML0D	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-1	30 TAC CHAPTER 115 (REG V) FACILITY TYPE = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. ALTERNATE CONTROL REQUIREMENT (ACR) [REG V] = No alternate control requirements are being utilized. PRODUCT TRANSFERRED = Volatile organic compounds other than liquefied petroleum gas and gasoline. TRANSFER TYPE = Loading and unloading. TRUE VAPOR PRESSURE [REG V] = True vapor pressure less than 0.5 psia.
323Z1	30 TAC Chapter 111, Visible Emissions	R1111-1	ACID GASES ONLY [REG I] = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. EMERGENCY/UPSET CONDITIONS ONLY [REG I] = Flare is used under conditions other than emergency or upset conditions.
323Z1	40 CFR Part 60, Subpart A	60A-1	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] = Steam-assisted FLARE EXIT VELOCITY [NSPS A, NESHAP A, AND/OR MACT A] = Flare exit velocity is less than 60 ft/s (18.3 m/sec)
323Z1	40 CFR Part 63, Subpart A	63A-1	REQUIRED UNDER 40 CFR 63 = Flare is not required by a Subpart under 40 CFR Part 63.
320FNH3PRO	30 TAC Chapter 115, HRVOC Fugitive Emissions	R5780-ALL	OWNER/OPERATOR ASSUMES HRVOC FUGITIVE CONTROL REQUIREMENTS FOR ALL COMPONENTS SUBJECT TO 30 TAC Chapter 115, HRVOC Fugitive Emissions WITH NO ALTERNATE CONTROL OR CONTROL DEVICE
320FNH3PRO	30 TAC Chapter 115, Pet. Refinery & Petrochemicals	R5352-ALL	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.
320FNH3PRO	40 CFR Part 63, Subpart H	63H-ALL	Owner/Operator assumes fugitive control requirements for all components in VOC or VHAP service subject to 40 CFR Part 63, Subpart H with no alternated control or control device.
GRPFUG1	30 TAC Chapter 115, Pet. Refinery & Petrochemicals	R5352-ALL	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.

Unit ID	Regulation	Index Number	Basis of Determination*
GRPFUG1	40 CFR Part 63, Subpart H	63H-ALL	Owner/Operator assumes fugitive control requirements for all components in VOC or VHAP service subject to 40 CFR Part 63, Subpart H with no alternated control or control device.
320Z322	40 CFR Part 63, Subpart G	63G-29	<p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>Control Device = Absorber used as a recapture device.</p> <p>Overlap = Title 40 CFR Part 63, Subpart G only</p> <p>Group 1 = The process vent meets the definition of a Group 1 process vent.</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>Regulation = Owners or operator is required to comply only with the requirements of 40 CFR Part 63, Subpart G.</p> <p>By-pass Lines = The vent system does not contain by-pass lines that can divert the vent stream from the control device.</p> <p>Performance Test = No previous performance test was conducted.</p>
322H4	30 TAC Chapter 117, Subchapter B	R7ICI	<p>CO EMISSION LIMITATION = Complying with 30 TAC § 117.310(c)(1)</p> <p>NOX EMISSION LIMITATION = Complying with 30 TAC § 117.310(a)(16)</p>

* - 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.: PSDTX910	Issuance Date: 01/06/2011
Nonattainment (NA) Permits	
NA Permit No.: NO11	Issuance Date: 01/06/2011
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.: 38998	Issuance Date: 01/06/2011
Authorization No.: 39171	Issuance Date: 03/30/2009
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: 106.476	Version No./Date: 09/04/2000
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.

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

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.: 322H4	
Control Device ID No.: 322H4	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Loading and Unloading of VOC	SOP Index No.: R5211-2
Pollutant: VOC	Main Standard: § 115.212(a)(6)(A)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: once per day	
Averaging Period: n/a*	
Deviation Limit: Temperature > 1500F	
Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.	

*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information	
ID No.: 323Z1	
Control Device ID No.: 323Z1	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112
Pollutant: VOC	Main Standard: § 115.112(a)(3)
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: n/a	
Deviation Limit: No pilot flame.	
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.: T320T302	
Control Device ID No.: 320Z322	Control Device Type: Absorber (Direct Absorption)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-25
Pollutant: VOC	Main Standard: § 115.112(a)(1)
Monitoring Information	
Indicator: Liquid Flow Rate	
Minimum Frequency: once per day	
Averaging Period: n/a*	
Deviation Limit: Minimum scrubber water flow = 5.8 gpm	
<p>Basis of CAM: These indicators are identified as the primary determinants of product recovery device operations. The key to control efficiency for an absorber is good contact between the exhaust gas and the absorbing liquid. Monitoring liquid flow rate, liquid supply pressure, and the liquid flow rate and gas flow rate are provided as monitoring options because monitoring these parameters can indicate malfunctions in the liquid pumping equipment, blockage of pipes or spray nozzles. Monitoring specific gravity and liquid VOC concentration is appropriate for direct absorption to indicate absorbing liquid saturation. Also monitoring liquid VOC concentration can indicate whether or not the absorbing liquid is actually absorbing the VOC, which can indicate that the control device is working properly. Monitoring outlet gas temperature can indicate the amount of VOC from the gas stream that can be absorbed by the scrubbing liquid. As the temperature increases the vapor pressure and energy level of the gas stream increases, raising the energy level of the absorbed molecules. At higher energy levels the absorbed molecules may have sufficient energy to overcome the attraction of the absorbing liquid. Therefore, absorbing liquids capture more air contaminants at low temperatures. Temperature is a good indicator of proper operation of the absorber. Therefore, monitoring combinations of these indicators, such as: outlet gas temperature and liquid flow rate; outlet gas temperature and liquid supply pressure; outlet gas temperature and specific gravity; liquid flow rate and liquid VOC concentration; liquid supply pressure and liquid VOC concentration; liquid flow rate and gas flow rate and liquid VOC concentration; liquid flow rate and specific gravity; liquid supply pressure and specific gravity; and liquid flow rate and gas flow rate and specific gravity, will help identify any potential problems with the control device. Specifically monitoring the scrubbing liquid flow or supply pressure and temperature is commonly required by and consistent with the May 1995 TCEQ guidance entitled "New Source Review Technical Guidance Package for Chemical Sources - Absorption Units". Also monitoring indicators to measure absorbing liquid saturation is commonly required in federal rules, including: 40 CFR Part 60, Subparts III, NNN, and RRR and 40 CFR Part 63, Subpart G.</p>	

*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information	
ID No.: T320T302	
Control Device ID No.: 320Z322	Control Device Type: Absorber (Direct Absorption)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-25
Pollutant: VOC	Main Standard: § 115.112(a)(1)
Monitoring Information	
Indicator: Scrubber Inlet Temperature	
Minimum Frequency: once per day	
Averaging Period: n/a*	
Deviation Limit: Maximum scrubber inlet temperature =60 F	
<p>Basis of CAM: These indicators are identified as the primary determinants of product recovery device operations. The key to control efficiency for an absorber is good contact between the exhaust gas and the absorbing liquid. Monitoring liquid flow rate, liquid supply pressure, and the liquid flow rate and gas flow rate are provided as monitoring options because monitoring these parameters can indicate malfunctions in the liquid pumping equipment, blockage of pipes or spray nozzles. Monitoring specific gravity and liquid VOC concentration is appropriate for direct absorption to indicate absorbing liquid saturation. Also monitoring liquid VOC concentration can indicate whether or not the absorbing liquid is actually absorbing the VOC, which can indicate that the control device is working properly. Monitoring outlet gas temperature can indicate the amount of VOC from the gas stream that can be absorbed by the scrubbing liquid. As the temperature increases the vapor pressure and energy level of the gas stream increases, raising the energy level of the absorbed molecules. At higher energy levels the absorbed molecules may have sufficient energy to overcome the attraction of the absorbing liquid. Therefore, absorbing liquids capture more air contaminants at low temperatures. Temperature is a good indicator of proper operation of the absorber. Therefore, monitoring combinations of these indicators, such as: outlet gas temperature and liquid flow rate; outlet gas temperature and liquid supply pressure; outlet gas temperature and specific gravity; liquid flow rate and liquid VOC concentration; liquid supply pressure and liquid VOC concentration; liquid flow rate and gas flow rate and liquid VOC concentration; liquid flow rate and specific gravity; liquid supply pressure and specific gravity; and liquid flow rate and gas flow rate and specific gravity, will help identify any potential problems with the control device. Specifically monitoring the scrubbing liquid flow or supply pressure and temperature is commonly required by and consistent with the May 1995 TCEQ guidance entitled "New Source Review Technical Guidance Package for Chemical Sources - Absorption Units". Also monitoring indicators to measure absorbing liquid saturation is commonly required in federal rules, including: 40 CFR Part 60, Subparts III, NNN, and RRR and 40 CFR Part 63, Subpart G.</p>	

*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information	
ID No.: T320T312	
Control Device ID No.: 320Z322	Control Device Type: Absorber (Direct Absorption)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-29
Pollutant: VOC	Main Standard: § 115.112(a)(1)
Monitoring Information	
Indicator: Liquid Flow Rate	
Minimum Frequency: once per day	
Averaging Period: n/a*	
Deviation Limit: Minimum liquid flow rate	
<p>Basis of CAM: These indicators are identified as the primary determinants of product recovery device operations. The key to control efficiency for an absorber is good contact between the exhaust gas and the absorbing liquid. Monitoring liquid flow rate, liquid supply pressure, and the liquid flow rate and gas flow rate are provided as monitoring options because monitoring these parameters can indicate malfunctions in the liquid pumping equipment, blockage of pipes or spray nozzles. Monitoring specific gravity and liquid VOC concentration is appropriate for direct absorption to indicate absorbing liquid saturation. Also monitoring liquid VOC concentration can indicate whether or not the absorbing liquid is actually absorbing the VOC, which can indicate that the control device is working properly. Monitoring outlet gas temperature can indicate the amount of VOC from the gas stream that can be absorbed by the scrubbing liquid. As the temperature increases the vapor pressure and energy level of the gas stream increases, raising the energy level of the absorbed molecules. At higher energy levels the absorbed molecules may have sufficient energy to overcome the attraction of the absorbing liquid. Therefore, absorbing liquids capture more air contaminants at low temperatures. Temperature is a good indicator of proper operation of the absorber. Therefore, monitoring combinations of these indicators, such as: outlet gas temperature and liquid flow rate; outlet gas temperature and liquid supply pressure; outlet gas temperature and specific gravity; liquid flow rate and liquid VOC concentration; liquid supply pressure and liquid VOC concentration; liquid flow rate and gas flow rate and liquid VOC concentration; liquid flow rate and specific gravity; liquid supply pressure and specific gravity; and liquid flow rate and gas flow rate and specific gravity, will help identify any potential problems with the control device. Specifically monitoring the scrubbing liquid flow or supply pressure and temperature is commonly required by and consistent with the May 1995 TCEQ guidance entitled "New Source Review Technical Guidance Package for Chemical Sources - Absorption Units". Also monitoring indicators to measure absorbing liquid saturation is commonly required in federal rules, including: 40 CFR Part 60, Subparts III, NNN, and RRR and 40 CFR Part 63, Subpart G.</p>	

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Unit/Group/Process Information	
ID No.: T320T312	
Control Device ID No.: 320Z322	Control Device Type: Absorber (Direct Absorption)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-29
Pollutant: VOC	Main Standard: § 115.112(a)(1)
Monitoring Information	
Indicator: Scrubber Inlet Temperature	
Minimum Frequency: once per day	
Averaging Period: n/a*	
Deviation Limit: Maximum scrubber inlet temperature = 60 F	
<p>Basis of CAM: These indicators are identified as the primary determinants of product recovery device operations. The key to control efficiency for an absorber is good contact between the exhaust gas and the absorbing liquid. Monitoring liquid flow rate, liquid supply pressure, and the liquid flow rate and gas flow rate are provided as monitoring options because monitoring these parameters can indicate malfunctions in the liquid pumping equipment, blockage of pipes or spray nozzles. Monitoring specific gravity and liquid VOC concentration is appropriate for direct absorption to indicate absorbing liquid saturation. Also monitoring liquid VOC concentration can indicate whether or not the absorbing liquid is actually absorbing the VOC, which can indicate that the control device is working properly. Monitoring outlet gas temperature can indicate the amount of VOC from the gas stream that can be absorbed by the scrubbing liquid. As the temperature increases the vapor pressure and energy level of the gas stream increases, raising the energy level of the absorbed molecules. At higher energy levels the absorbed molecules may have sufficient energy to overcome the attraction of the absorbing liquid. Therefore, absorbing liquids capture more air contaminants at low temperatures. Temperature is a good indicator of proper operation of the absorber. Therefore, monitoring combinations of these indicators, such as: outlet gas temperature and liquid flow rate; outlet gas temperature and liquid supply pressure; outlet gas temperature and specific gravity; liquid flow rate and liquid VOC concentration; liquid supply pressure and liquid VOC concentration; liquid flow rate and gas flow rate and liquid VOC concentration; liquid flow rate and specific gravity; liquid supply pressure and specific gravity; and liquid flow rate and gas flow rate and specific gravity, will help identify any potential problems with the control device. Specifically monitoring the scrubbing liquid flow or supply pressure and temperature is commonly required by and consistent with the May 1995 TCEQ guidance entitled "New Source Review Technical Guidance Package for Chemical Sources - Absorption Units". Also monitoring indicators to measure absorbing liquid saturation is commonly required in federal rules, including: 40 CFR Part 60, Subparts III, NNN, and RRR and 40 CFR Part 63, Subpart G.</p>	

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Unit/Group/Process Information	
ID No.: T320T315	
Control Device ID No.: 320Z322	Control Device Type: Absorber (Direct Absorption)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-30
Pollutant: VOC	Main Standard: § 115.112(a)(1)
Monitoring Information	
Indicator: Liquid Flow Rate	
Minimum Frequency: once per day	
Averaging Period: n/a*	
Deviation Limit: Minimum liquid flow rate = 5.8 gpm	
<p>Basis of CAM: These indicators are identified as the primary determinants of product recovery device operations. The key to control efficiency for an absorber is good contact between the exhaust gas and the absorbing liquid. Monitoring liquid flow rate, liquid supply pressure, and the liquid flow rate and gas flow rate are provided as monitoring options because monitoring these parameters can indicate malfunctions in the liquid pumping equipment, blockage of pipes or spray nozzles. Monitoring specific gravity and liquid VOC concentration is appropriate for direct absorption to indicate absorbing liquid saturation. Also monitoring liquid VOC concentration can indicate whether or not the absorbing liquid is actually absorbing the VOC, which can indicate that the control device is working properly. Monitoring outlet gas temperature can indicate the amount of VOC from the gas stream that can be absorbed by the scrubbing liquid. As the temperature increases the vapor pressure and energy level of the gas stream increases, raising the energy level of the absorbed molecules. At higher energy levels the absorbed molecules may have sufficient energy to overcome the attraction of the absorbing liquid. Therefore, absorbing liquids capture more air contaminants at low temperatures. Temperature is a good indicator of proper operation of the absorber. Therefore, monitoring combinations of these indicators, such as: outlet gas temperature and liquid flow rate; outlet gas temperature and liquid supply pressure; outlet gas temperature and specific gravity; liquid flow rate and liquid VOC concentration; liquid supply pressure and liquid VOC concentration; liquid flow rate and gas flow rate and liquid VOC concentration; liquid flow rate and specific gravity; liquid supply pressure and specific gravity; and liquid flow rate and gas flow rate and specific gravity, will help identify any potential problems with the control device. Specifically monitoring the scrubbing liquid flow or supply pressure and temperature is commonly required by and consistent with the May 1995 TCEQ guidance entitled "New Source Review Technical Guidance Package for Chemical Sources - Absorption Units". Also monitoring indicators to measure absorbing liquid saturation is commonly required in federal rules, including: 40 CFR Part 60, Subparts III, NNN, and RRR and 40 CFR Part 63, Subpart G.</p>	

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Unit/Group/Process Information	
ID No.: T320T315	
Control Device ID No.: 320Z322	Control Device Type: Absorber (Direct Absorption)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-30
Pollutant: VOC	Main Standard: § 115.112(a)(1)
Monitoring Information	
Indicator: Scrubber Inlet Temperature	
Minimum Frequency: once per day	
Averaging Period: n/a*	
Deviation Limit: Maximum scrubber inlet temperature = 60F	
<p>Basis of CAM: These indicators are identified as the primary determinants of product recovery device operations. The key to control efficiency for an absorber is good contact between the exhaust gas and the absorbing liquid. Monitoring liquid flow rate, liquid supply pressure, and the liquid flow rate and gas flow rate are provided as monitoring options because monitoring these parameters can indicate malfunctions in the liquid pumping equipment, blockage of pipes or spray nozzles. Monitoring specific gravity and liquid VOC concentration is appropriate for direct absorption to indicate absorbing liquid saturation. Also monitoring liquid VOC concentration can indicate whether or not the absorbing liquid is actually absorbing the VOC, which can indicate that the control device is working properly. Monitoring outlet gas temperature can indicate the amount of VOC from the gas stream that can be absorbed by the scrubbing liquid. As the temperature increases the vapor pressure and energy level of the gas stream increases, raising the energy level of the absorbed molecules. At higher energy levels the absorbed molecules may have sufficient energy to overcome the attraction of the absorbing liquid. Therefore, absorbing liquids capture more air contaminants at low temperatures. Temperature is a good indicator of proper operation of the absorber. Therefore, monitoring combinations of these indicators, such as: outlet gas temperature and liquid flow rate; outlet gas temperature and liquid supply pressure; outlet gas temperature and specific gravity; liquid flow rate and liquid VOC concentration; liquid supply pressure and liquid VOC concentration; liquid flow rate and gas flow rate and liquid VOC concentration; liquid flow rate and specific gravity; liquid supply pressure and specific gravity; and liquid flow rate and gas flow rate and specific gravity, will help identify any potential problems with the control device. Specifically monitoring the scrubbing liquid flow or supply pressure and temperature is commonly required by and consistent with the May 1995 TCEQ guidance entitled "New Source Review Technical Guidance Package for Chemical Sources - Absorption Units". Also monitoring indicators to measure absorbing liquid saturation is commonly required in federal rules, including: 40 CFR Part 60, Subparts III, NNN, and RRR and 40 CFR Part 63, Subpart G.</p>	

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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