

# Statement of Basis of the Federal Operating Permit

OXEA Corporation

Site Name: Bay City Plant  
Physical Location: 2001 FM 3057  
Nearest City: Bay City  
County: Matagorda

Permit Number: O2943  
Project Type: Renewal

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 permit conditions in accordance with 30 TAC §122.201(a)(4). Per 30 TAC §§ 122.241 and 243, the permit holder has submitted an application under § 122.134 for permit renewal. This document may include the following information:

- A description of the facility/area process description;
- A basis for applying permit shields;
- A list of the federal regulatory applicability determinations;
- A table listing the determination of applicable requirements;
- A list of the New Source Review Requirements;
- The rationale for periodic monitoring methods selected;
- The rationale for compliance assurance methods selected;
- A compliance status; and
- A list of available unit attribute forms.

Prepared on: October 27, 2016

## **Operating Permit Basis of Determination**

### **Permit Area Process Description**

#### **Butanol Production:**

Butyraldehyde is produced through the rhodium-catalyst hydroformylation of propylene with synthesis gas and H<sub>2</sub>. Propylene, synthesis gas and hydrogen enter the oxo section where they react to form crude butyraldehyde. A series of purification columns separate crude butyraldehyde, catalyst, and unreacted propylene. The catalyst and propylene recycle back to the oxo section for further processing. A small gas purge is sent to the Bay City Site boilers or the ethylene flare to control inert gases. The crude butyraldehyde produced in the oxo section undergoes further purification into sales grade n-butyraldehyde. Additional crude butyraldehyde provides feedstock for the butanol section. This crude reacts with H<sub>2</sub> in the presence of a catalyst to form crude butanol. The process routes excess H<sub>2</sub> and inert gases to the site boilers and the ethylene flare. A series of purification columns rectifies the crude butanol into n-butanol and i-butanol product. Waste streams produced during the purification step route to the site boilers for energy recovery.

#### **Propanol Production:**

Propionaldehyde is produced by the reaction of synthesis gas and hydrogen. Ethylene, synthesis gas, and H<sub>2</sub> enter the oxo section where they react to form propionaldehyde. A series of purification columns separates propionaldehyde from unreacted ethylene and synthesis gas. The ethylene and synthesis gas recycle back to the oxo section for further processing. A small gas purge is sent to the Bay City Site boilers or the ethylene flare to control inert gases. The propionaldehyde produced in the oxo section provides feedstock for the propanol section. In this section propionaldehyde reacts with H<sub>2</sub> in the presence of a catalyst to form crude propanol. The process routes excess H<sub>2</sub> and inert gases to the site boilers and the ethylene flare. A series of purification columns rectifies the crude propanol into specification grade product. Waste streams produced during the purification step route to the site boilers for energy recovery.

#### **SFA & POX Units:**

The SFA unit manufactures heptanoic acid, heptanal, nonanoic acid, and nonanal. The POX unit manufactures synthetic gas and crude hydrogen for use by other process units at the site.

#### Fatty Acid Production:

The SFA unit operates on a campaign basis to produce heptanoic acid and nonanoic acids. The SFA process consists of three major steps:

1. Production of Aldehydes
2. Oxidation of aldehydes from olefin feedstocks
3. Purification of crude acid

#### Oxo Reaction:

Olefin raw materials are sparged with synthesis gas from the POX unit in the Oxo reactor. The reaction occurs in the presence of a catalyst. A crude aldehyde and catalyst solution is also introduced to speed up the reaction. The produced crude aldehyde is then removed from the reactor solution in a vacuum flasher column. Finally, any unconverted olefin and light ends are removed in a subsequent aldehyde purification column.

#### Secondary Oxidation:

Purified aldehydes are then sent to the secondary oxidation section. The purified aldehydes are sparged with oxygen in the primary and secondary HOOP reactors to produce crude heptanoic or nonanoic acids.

#### Purification & Emissions:

The crude acids are sent through a series of distillation columns for purification.

#### **Acetate Unit:**

The Acetate Unit operates on a campaign basis to produce propyl acetate, i-acetate, and n-butylacetate (acetate esters) from propanol, i-butanol & n-butanol, and acetic acid. The process consists of three major steps:

1. Production of acetate esters from the reaction of acetic acid and alcohol
2. Removal of organics from the water of reaction utilizing distillation columns
3. Further purification of step 2 involving distillation columns

Effluent water generated from the process is sent for neutralization treatment. Vent gases from the process are sent to either the boilers or the ethylene flare. The final products are stored in multiple tanks prior to loading and shipping.

### 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: None

### 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’ Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as “applicable requirements”) that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
  - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
  - Additional Monitoring Requirements
  - New Source Review Authorization Requirements
  - Compliance Requirements
  - Protection of Stratosphere Ozone
  - Permit Location
  - Permit Shield (30 TAC § 122.148)
- Attachments
  - Applicable Requirements Summary
    - Unit Summary
    - Applicable Requirements Summary
  - Additional Monitoring Requirements
  - Permit Shield
  - New Source Review Authorization References
  - Compliance Plan
  - Alternative Requirements
- Appendix A
  - Acronym list
- Appendix B
  - Copies of major NSR authorizations

## General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

## Special Terms and Conditions

**Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting.** The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

**Other conditions.** The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

## Attachments

**Applicable Requirements Summary.** The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the "index number," detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

**Additional Monitoring Requirement.** The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

**Permit Shield.** A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

#### Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

#### Appendix B

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

#### **Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions**

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed before or 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 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.

**Stationary Vents subject to 30 TAC Chapter 111 not addressed in the Special Terms and Conditions**

All other stationary vents subject to 30 TAC Chapter 111 not covered in the Special Terms and Conditions are listed in the permit’s Applicable Requirement Summary. The basis for the applicability determinations for these vents is listed in the Determination of Applicable Requirements table.

**Federal Regulatory Applicability Determinations**

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	Yes
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	Yes
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	Yes
CAIR (Clean Air Interstate Rule)	No

**Basis for Applying Permit Shields**

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the “Permit Shield” attachment of the permit.

**Insignificant Activities**

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

1. Office activities such as photocopying, blueprint copying, and photographic processes.
2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
4. Outdoor barbecue pits, campfires, and fireplaces.

5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
9. Vehicle exhaust from maintenance or repair shops.
10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
15. Well cellars.
16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
18. Equipment used exclusively for the melting or application of wax.
19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
20. Shell core and shell mold manufacturing machines.
21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
22. Equipment used for inspection of metal products.
23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
25. Battery recharging areas.
26. Brazing, soldering, or welding equipment.

### **Determination of Applicable Requirements**

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at [www.tceq.texas.gov/permitting/air/nav/air\\_all\\_ua\\_forms.html](http://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](http://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**

<b>Unit ID</b>	<b>Regulation</b>	<b>Index Number</b>	<b>Basis of Determination*</b>	<b>Changes and Exceptions to DSS**</b>
251CV1263	30 TAC Chapter 115, Storage of VOCs	115B-1	<p>Today's Date = Today's date is March 1, 2013 or later.</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 does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 25,000 gallons</p>	
251CV1263	40 CFR Part 60, Subpart Kb	60Kb-1	<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 0.5 psia but less than 0.75 psia</p> <p>Storage Vessel Description = Emission controls not required (fixed roof)</p>	
302V763	30 TAC Chapter 115, Storage of VOCs	115B-1	<p>Construction Date = On or after May 12, 1973</p> <p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia but less than 11 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>	
GRP-TANKS1	30 TAC Chapter 115, Storage of VOCs	115B-1	<p>Construction Date = Before May 12, 1973</p> <p>Today's Date = Today's date is March 1, 2013 or later.</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 does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia but less than 11 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>	
GRP-TANKS10	30 TAC Chapter 115, Storage of VOCs	115B-1	<p>Today's Date = Today's date is March 1, 2013 or later.</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>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is less than or equal to 1,000 gallons</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
GRP-TANKS10	40 CFR Part 60, Subpart Kb	60Kb-1	Product Stored = Volatile organic liquid Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)	
GRP-TANKS11	30 TAC Chapter 115, Storage of VOCs	115B-1	Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized Today's Date = Today's date is March 1, 2013 or later. 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 1.5 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	
GRP-TANKS2	30 TAC Chapter 115, Storage of VOCs	115B-1	Construction Date = On or after May 12, 1973 Today's Date = Today's date is March 1, 2013 or later. 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 but less than 11 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	
GRP-TANKS2	30 TAC Chapter 115, Storage of VOCs	115B-2	Construction Date = On or after May 12, 1973 Today's Date = Today's date is March 1, 2013 or later. 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 but less than 11 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 = Other vapor recovery unit	
GRP-TANKS4	30 TAC Chapter 115, Storage of VOCs	115B-1	Today's Date = Today's date is March 1, 2013 or later. 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 without slotted sampling and gauge pipes True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia but less than 11 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 25,000 gallons	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
GRP-TANKS5	30 TAC Chapter 115, Storage of VOCs	115B-1	<p>Construction Date = On or after May 12, 1973</p> <p>Today's Date = Today's date is March 1, 2013 or later.</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 an internal floating roof without slotted sampling and gauge pipes</p> <p>True Vapor Pressure = True vapor pressure is less than 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>	
GRP-TANKS6	30 TAC Chapter 115, Storage of VOCs	115B-1	<p>Today's Date = Today's date is March 1, 2013 or later.</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 does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 25,000 gallons</p>	
GRP-TANKS6	40 CFR Part 60, Subpart Kb	60Kb-1	<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 less than 0.5 psia</p>	
GRP-TANKS7	30 TAC Chapter 115, Storage of VOCs	115B-1	<p>Construction Date = On or after May 12, 1973</p> <p>Today's Date = Today's date is March 1, 2013 or later.</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 an internal floating roof without slotted sampling and gauge pipes</p> <p>True Vapor Pressure = True vapor pressure is less than 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 25,000 gallons</p>	
GRP-TANKS7	40 CFR Part 60, Subpart Kb	60Kb-1	<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 0.75 psia but less than 11.1 psia</p> <p>Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal</p>	
GRP-TANKS8	30 TAC Chapter 115, Storage of VOCs	115B-1	<p>Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized</p> <p>Today's Date = Today's date is March 1, 2013 or later.</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 does not require emission controls</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>True Vapor Pressure = True vapor pressure is less than 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>	
GRP-TANKS8	40 CFR Part 60, Subpart Kb	60Kb-1	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)</p>	
GRP-TANKS9	30 TAC Chapter 115, Storage of VOCs	115B-1	<p>Construction Date = Date not determined since 30 TAC § 115.117(c)(3) exemption is not utilized</p> <p>Today's Date = Today's date is March 1, 2013 or later.</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 does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>	
999DTLGAS	30 TAC Chapter 115, Loading and Unloading of VOC	115C-1	Chapter 115 Facility Type = Motor vehicle fuel dispensing facility	
GRP-LOAD	30 TAC Chapter 115, Loading and Unloading of VOC	115C-1	<p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.</p> <p>Transfer Type = Only loading.</p> <p>True Vapor Pressure = True vapor pressure is less than 1.5 psia.</p>	
302M3069	40 CFR Part 60, Subpart Db	60Db-1	<p>60.42b(k)(2) Low Sulfur Exemption = The § 60.42b(k)(2) exemption does not apply.</p> <p>Construction/Modification Date = Constructed or reconstructed after February 28, 2005.</p> <p>D-Series Fuel Type #1 = Natural gas.</p> <p>Heat Input Capacity = Heat input capacity is greater than 250 MMBtu/hr (73 MW).</p> <p>PM Monitoring Type = No particulate monitoring.</p> <p>Opacity Monitoring Type = No particulate (opacity) monitoring.</p> <p>Subpart Da = The affected facility does not meet applicability requirements of 40 CFR Part 60, Subpart Da.</p> <p>Changes to Existing Affected Facility = No change has been made to the existing steam generating unit, which was not previously subject to 40 CFR Part 60, Subpart Db, for the sole purpose of combusting gases containing totally reduced sulfur as defined under 40 CFR § 60.281.</p> <p>NOx Monitoring Type = No NO<sub>x</sub> monitoring.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Electrical or Mechanical Output = 10% or less of the annual output is electrical or mechanical.</p> <p>SO2 Monitoring Type = As-fired sampling.</p> <p>Subpart Ea, Eb or AAAA = The affected facility does not meet applicability requirements of and is subject to 40 CFR Part 60, Subpart Ea, Eb or AAAA.</p> <p>Subpart J = The affected facility does not meet applicability requirements of 40 CFR Part 60, Subpart J.</p> <p>Subpart E = The affected facility does not meet applicability requirements of 40 CFR Part 60, Subpart E.</p> <p>Subpart KKKK = The affected facility is not a heat recovery steam generator associated with combined cycle gas turbines and that meets applicability requirements of and is subject to 40 CFR Part 60, Subpart KKKK.</p> <p>Technology Type = None.</p> <p>ACF Option - SO2 = Other ACF or no ACF.</p> <p>Subpart Cb or BBBB = The affected facility is not covered by an EPA approved State or Federal section 111(d)/129 plan implementing 40 CFR Part 60, Subpart Cb or BBBB emission guidelines.</p> <p>Unit Type = OTHER UNIT TYPE</p> <p>ACF Option - PM = Other ACF or no ACF.</p> <p>Heat Release Rate = Natural gas oil with a heat release rate greater than 70 MBtu/hr/ft<sup>3</sup>.</p> <p>60.49Da(n) Alternative = The facility is not using the § 60.49Da(n) alternative.</p> <p>ACF Option - NOx = Other ACF or no ACF.</p> <p>60.49Da(m) Alternative = The facility is not using the § 60.49Da(m) alternative.</p>	
302M3069	40 CFR Part 60, Subpart Db	60Db-2	<p>60.42b(k)(2) Low Sulfur Exemption = The § 60.42b(k)(2) exemption does not apply.</p> <p>Alternate Emission Limit (AEL) = The facility combusts byproduct/waste with either natural gas or oil and did not petition the EPA Administrator to establish a NO<sub>x</sub> emission limit that applies specifically when the byproduct/waste is combusted.</p> <p>Construction/Modification Date = Constructed or reconstructed after February 28, 2005.</p> <p>D-Series Fuel Type #1 = Byproduct/waste.</p> <p>Heat Input Capacity = Heat input capacity is greater than 250 MMBtu/hr (73 MW).</p> <p>PM Monitoring Type = No particulate monitoring.</p> <p>Opacity Monitoring Type = No particulate (opacity) monitoring.</p> <p>Subpart Da = The affected facility does not meet applicability requirements of 40 CFR Part 60, Subpart Da.</p> <p>Changes to Existing Affected Facility = No change has been made to the existing steam generating unit, which was not previously subject to 40 CFR Part 60, Subpart Db, for the sole purpose of combusting gases containing totally reduced sulfur as defined under 40 CFR § 60.281.</p> <p>NOx Monitoring Type = No NO<sub>x</sub> monitoring.</p> <p>Electrical or Mechanical Output = 10% or less of the annual output is electrical or mechanical.</p> <p>SO2 Monitoring Type = As-fired sampling.</p> <p>Subpart Ea, Eb or AAAA = The affected facility does not meet applicability requirements of and is</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>subject to 40 CFR Part 60, Subpart Ea, Eb or AAAA.</p> <p>Subpart J = The affected facility does not meet applicability requirements of 40 CFR Part 60, Subpart J.</p> <p>Subpart E = The affected facility does not meet applicability requirements of 40 CFR Part 60, Subpart E.</p> <p>Subpart KKKK = The affected facility is not a heat recovery steam generator associated with combined cycle gas turbines and that meets applicability requirements of and is subject to 40 CFR Part 60, Subpart KKKK.</p> <p>Technology Type = None.</p> <p>ACF Option - SO2 = Other ACF or no ACF.</p> <p>Subpart Cb or BBBB = The affected facility is not covered by an EPA approved State or Federal section 111(d)/129 plan implementing 40 CFR Part 60, Subpart Cb or BBBB emission guidelines.</p> <p>Unit Type = OTHER UNIT TYPE</p> <p>ACF Option - PM = Other ACF or no ACF.</p> <p>Heat Release Rate = Natural gas oil with a heat release rate greater than 70 MBtu/hr/ft<sup>3</sup>.</p> <p>60.49Da(n) Alternative = The facility is not using the § 60.49Da(n) alternative.</p> <p>ACF Option - NOx = Other ACF or no ACF.</p> <p>60.49Da(m) Alternative = The facility is not using the § 60.49Da(m) alternative.</p>	
302M3069	40 CFR Part 63, Subpart DDDDD	63DDDDD-1	Construction/Reconstruction Date = Construction or reconstruction began on or before June 4, 2010.	
302M3077	40 CFR Part 60, Subpart Db	60Db-1	<p>60.42b(k)(2) Low Sulfur Exemption = The § 60.42b(k)(2) exemption applies.</p> <p>Construction/Modification Date = Constructed or reconstructed after February 28, 2005.</p> <p>D-Series Fuel Type #1 = Natural gas.</p> <p>Heat Input Capacity = Heat input capacity is greater than 100 MMBtu/hr (29 MW) but less than or equal to 250 MMBtu/hr (73 MW).</p> <p>PM Monitoring Type = No particulate monitoring.</p> <p>Opacity Monitoring Type = No particulate (opacity) monitoring.</p> <p>Subpart Da = The affected facility does not meet applicability requirements of 40 CFR Part 60, Subpart Da.</p> <p>Changes to Existing Affected Facility = No change has been made to the existing steam generating unit, which was not previously subject to 40 CFR Part 60, Subpart Db, for the sole purpose of combusting gases containing totally reduced sulfur as defined under 40 CFR § 60.281.</p> <p>NOx Monitoring Type = No NO<sub>x</sub> monitoring.</p> <p>Subpart D = The affected facility does not meet the applicability requirements of 40 CFR Part 60, Subpart D.</p> <p>Electrical or Mechanical Output = 10% or less of the annual output is electrical or mechanical.</p> <p>SO2 Monitoring Type = Fuel certification (maintaining receipts per § 60.49b(r)(1)).</p> <p>Subpart Ea, Eb or AAAA = The affected facility does not meet applicability requirements of and is subject to 40 CFR Part 60, Subpart Ea, Eb or AAAA.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Subpart J = The affected facility does not meet applicability requirements of 40 CFR Part 60, Subpart J.</p> <p>Subpart E = The affected facility does not meet applicability requirements of 40 CFR Part 60, Subpart E.</p> <p>Subpart KKKK = The affected facility is not a heat recovery steam generator associated with combined cycle gas turbines and that meets applicability requirements of and is subject to 40 CFR Part 60, Subpart KKKK.</p> <p>Technology Type = None.</p> <p>ACF Option - SO<sub>2</sub> = Other ACF or no ACF.</p> <p>Subpart Cb or BBBB = The affected facility is not covered by an EPA approved State or Federal section 111(d)/129 plan implementing 40 CFR Part 60, Subpart Cb or BBBB emission guidelines.</p> <p>Unit Type = OTHER UNIT TYPE</p> <p>ACF Option - PM = Other ACF or no ACF.</p> <p>Heat Release Rate = Natural gas oil with a heat release rate greater than 70 MBtu/hr/ft<sup>3</sup>.</p> <p>60.49Da(n) Alternative = The facility is not using the § 60.49Da(n) alternative.</p> <p>ACF Option - NO<sub>x</sub> = Other ACF or no ACF.</p> <p>60.49Da(m) Alternative = The facility is not using the § 60.49Da(m) alternative.</p>	
302M3077	40 CFR Part 60, Subpart Db	60Db-2	<p>60.42b(k)(2) Low Sulfur Exemption = The § 60.42b(k)(2) exemption applies.</p> <p>Construction/Modification Date = Constructed or reconstructed after February 28, 2005.</p> <p>D-Series Fuel Type #1 = Natural gas.</p> <p>D-Series Fuel Type #2 = Gaseous fossil fuel other than natural gas and coal-derived synthetic fuel meeting the definition of natural gas.</p> <p>Heat Input Capacity = Heat input capacity is greater than 100 MMBtu/hr (29 MW) but less than or equal to 250 MMBtu/hr (73 MW).</p> <p>PM Monitoring Type = No particulate monitoring.</p> <p>Opacity Monitoring Type = No particulate (opacity) monitoring.</p> <p>Subpart Da = The affected facility does not meet applicability requirements of 40 CFR Part 60, Subpart Da.</p> <p>Changes to Existing Affected Facility = No change has been made to the existing steam generating unit, which was not previously subject to 40 CFR Part 60, Subpart Db, for the sole purpose of combusting gases containing totally reduced sulfur as defined under 40 CFR § 60.281.</p> <p>NO<sub>x</sub> Monitoring Type = No NO<sub>x</sub> monitoring.</p> <p>Subpart D = The affected facility does not meet the applicability requirements of 40 CFR Part 60, Subpart D.</p> <p>Electrical or Mechanical Output = 10% or less of the annual output is electrical or mechanical.</p> <p>SO<sub>2</sub> Monitoring Type = Fuel certification (maintaining receipts per § 60.49b(r)(1)).</p> <p>Subpart Ea, Eb or AAAA = The affected facility does not meet applicability requirements of and is subject to 40 CFR Part 60, Subpart Ea, Eb or AAAA.</p> <p>Subpart J = The affected facility does not meet applicability requirements of 40 CFR Part 60, Subpart J.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Subpart E = The affected facility does not meet applicability requirements of 40 CFR Part 60, Subpart E.</p> <p>Subpart KKKK = The affected facility is not a heat recovery steam generator associated with combined cycle gas turbines and that meets applicability requirements of and is subject to 40 CFR Part 60, Subpart KKKK.</p> <p>Technology Type = None.</p> <p>ACF Option - SO<sub>2</sub> = Other ACF or no ACF.</p> <p>Subpart Cb or BBBB = The affected facility is not covered by an EPA approved State or Federal section 111(d)/129 plan implementing 40 CFR Part 60, Subpart Cb or BBBB emission guidelines.</p> <p>Unit Type = OTHER UNIT TYPE</p> <p>ACF Option - PM = Other ACF or no ACF.</p> <p>Heat Release Rate = Natural gas oil with a heat release rate greater than 70 MBtu/hr/ft<sup>3</sup>.</p> <p>60.49Da(n) Alternative = The facility is not using the § 60.49Da(n) alternative.</p> <p>ACF Option - NO<sub>x</sub> = Other ACF or no ACF.</p> <p>60.49Da(m) Alternative = The facility is not using the § 60.49Da(m) alternative.</p>	
302M3077	40 CFR Part 60, Subpart Db	60Db-3	<p>60.42b(k)(2) Low Sulfur Exemption = The § 60.42b(k)(2) exemption applies.</p> <p>Construction/Modification Date = Constructed or reconstructed after February 28, 2005.</p> <p>D-Series Fuel Type #1 = Natural gas.</p> <p>D-Series Fuel Type #2 = Gaseous fossil fuel other than natural gas and coal-derived synthetic fuel meeting the definition of natural gas.</p> <p>Heat Input Capacity = Heat input capacity is greater than 100 MMBtu/hr (29 MW) but less than or equal to 250 MMBtu/hr (73 MW).</p> <p>PM Monitoring Type = No particulate monitoring.</p> <p>D-Series Fuel Type #3 = Hazardous waste.</p> <p>Opacity Monitoring Type = No particulate (opacity) monitoring.</p> <p>Subpart Da = The affected facility does not meet applicability requirements of 40 CFR Part 60, Subpart Da.</p> <p>Changes to Existing Affected Facility = No change has been made to the existing steam generating unit, which was not previously subject to 40 CFR Part 60, Subpart Db, for the sole purpose of combusting gases containing totally reduced sulfur as defined under 40 CFR § 60.281.</p> <p>NO<sub>x</sub> Monitoring Type = No NO<sub>x</sub> monitoring.</p> <p>Subpart D = The affected facility does not meet the applicability requirements of 40 CFR Part 60, Subpart D.</p> <p>Electrical or Mechanical Output = 10% or less of the annual output is electrical or mechanical.</p> <p>SO<sub>2</sub> Monitoring Type = Fuel certification (maintaining receipts per § 60.49b(r)(1)).</p> <p>Subpart Ea, Eb or AAAAA = The affected facility does not meet applicability requirements of and is subject to 40 CFR Part 60, Subpart Ea, Eb or AAAAA.</p> <p>Subpart J = The affected facility does not meet applicability requirements of 40 CFR Part 60, Subpart J.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Subpart E = The affected facility does not meet applicability requirements of 40 CFR Part 60, Subpart E.</p> <p>Subpart KKKK = The affected facility is not a heat recovery steam generator associated with combined cycle gas turbines and that meets applicability requirements of and is subject to 40 CFR Part 60, Subpart KKKK.</p> <p>Technology Type = None.</p> <p>ACF Option - SO2 = Other ACF or no ACF.</p> <p>Subpart Cb or BBBB = The affected facility is not covered by an EPA approved State or Federal section 111(d)/129 plan implementing 40 CFR Part 60, Subpart Cb or BBBB emission guidelines.</p> <p>Unit Type = OTHER UNIT TYPE</p> <p>ACF Option - PM = Other ACF or no ACF.</p> <p>Heat Release Rate = Natural gas oil with a heat release rate greater than 70 MBtu/hr/ft<sup>3</sup>.</p> <p>60.49Da(n) Alternative = The facility is not using the § 60.49Da(n) alternative.</p> <p>ACF Option - NOx = Other ACF or no ACF.</p> <p>60.49Da(m) Alternative = The facility is not using the § 60.49Da(m) alternative.</p>	
302M3077	40 CFR Part 63, Subpart EEE	63EEE-1	<p>ALT Metals = In lieu of complying with the particulate matter standards, you elect to comply with the alternative metal emission control requirement.</p> <p>Type Fuel = Boiler burns liquid fuel.</p> <p>Existing Source = The boiler is a new source (construction or reconstruction commenced after April 20, 2004).</p> <p>Met Feedrate = Feedrate levels are established as 12-hour rolling average limit for semivolatile and low volatile metals.</p> <p>Area Source = The boiler is a major source as defined under §63.2.</p> <p>CO/THC Standard = Complying with the CO standard in § 63.1216(a)(5)(i) or (b)(5)(i); or § 63.1217(a)(5)(i) or (b)(5)(i).</p> <p>Baghouse = The boiler is not equipped with a baghouse.</p> <p>Dioxin/Furan Standard = Complying with the CO standard in § 63.1217(a)(1)(ii) or (b)(1)(ii).</p> <p>Dioxin-Listed = The boiler does not burn the dioxin-listed hazardous wastes F020, F021, F022, F023, F026, or F027.</p> <p>Heating Value = The hazardous waste as-fired heating value is 10,000 Btu/lb or greater.</p> <p>DRE Previous Test = DRE testing during the comprehensive initial performance testing is used to document conformance with the DRE standard.</p>	<p>The following citations under 40 CFR 63 Subpart EEE that pertain to control devices that OXEA is not and will never use have been removed.</p> <p>Affected Pollutant - Dioxins/Furans: Deleted Related Standards [G]§ 63.1209(k)(7) [G]§ 63.1209(k)(8) [G]§ 63.1209(k)(9)</p> <p>Affected Pollutant - Total Chlorine: Deleted Related Standards [G]§ 63.1209(o)(3) § 63.1209(o)(4)</p>
302M331	40 CFR Part 60, Subpart Db	60Db-1	Construction/Modification Date = On or before June 19, 1984.	
302M331	40 CFR Part 63, Subpart EEE	63EEE-1	<p>ALT Metals = In lieu of complying with the particulate matter standards, you elect to comply with the alternative metal emission control requirement.</p> <p>Type Fuel = Boiler burns liquid fuel.</p> <p>Existing Source = The boiler is an existing source (construction or reconstruction commenced on or</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>before April 20, 2004).</p> <p>Met Feedrate = Feedrate levels are established as 12-hour rolling average limit for semivolatile and low volatile metals.</p> <p>Area Source = The boiler is a major source as defined under §63.2.</p> <p>CO/THC Standard = Complying with the CO standard in § 63.1216(a)(5)(i) or (b)(5)(i); or § 63.1217(a)(5)(i) or (b)(5)(i).</p> <p>Baghouse = The boiler is not equipped with a baghouse.</p> <p>Dioxin-Listed = The boiler does not burn the dioxin-listed hazardous wastes F020, F021, F022, F023, F026, or F027.</p> <p>DRE Previous Test = Previous testing was used to document conformance with the DRE standard.</p> <p>Hg Feedrate = Feedrate levels are established as 12-hour rolling average limit for Hg.</p>	
302M460	40 CFR Part 60, Subpart D	60D-1	Construction/Modification Date = On or before August 17, 1971.	
302M460	40 CFR Part 63, Subpart DDDDD	63DDDDD-1	Construction/Reconstruction Date = Construction or reconstruction began on or before June 4, 2010.	
303M1239	30 TAC Chapter 111, Visible Emissions	111A-1	<p>Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1.</p> <p>Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.</p> <p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p>	
303M1239	40 CFR Part 60, Subpart A	60A-1	<p>Subject to 40 CFR § 60.18 = Flare is subject to 40 CFR § 60.18.</p> <p>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).</p> <p>Flare Assist Type = Steam-assisted</p> <p>Flare Exit Velocity = Flare exit velocity is greater than or equal to 60 ft/s (18.3 m/sec) but less than 400 ft/s (122 m/sec).</p> <p>Heating Value of Gas = Heating value is less than or equal to 1000 Btu/scf (37.3 MJ/scm).</p>	
303M1239	40 CFR Part 63, Subpart A	63A-1	<p>Required Under 40 CFR Part 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 = Steam assisted</p> <p>Flare Exit Velocity = Flare exit velocity is greater than or equal to 60 ft/s (18.3 m/sec) but less than 400 ft/s (122 m/sec).</p> <p>Heating Value of Gas = Heating value is less than or equal to 1000 Btu/scf (37.3 MJ/scm).</p>	
306M2107	30 TAC Chapter 111, Visible Emissions	111A-1	<p>Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1.</p> <p>Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.</p> <p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
306M2107	40 CFR Part 60, Subpart A	60A-1	Subject to 40 CFR § 60.18 = Flare is not subject to 40 CFR § 60.18.	
306M2107	40 CFR Part 63, Subpart A	63A-1	Required Under 40 CFR Part 63 = Flare is not required by a Subpart under 40 CFR Part 63.	
108F	40 CFR Part 60, Subpart VV	60VV-1	<p>Produces Chemicals = The fugitive unit is part of a facility that produces as an intermediate or final product one or more of the chemicals listed in 40 CFR § 60.489.</p> <p>Affected Facility = The fugitive unit is part of a facility that is an affected facility as defined in 40 CFR § 60.480(a)(2).</p> <p>Construction/Modification Date = On or before January 5, 1981.</p>	
FUGITIVES	40 CFR Part 60, Subpart VV	60VV-1	<p>Closed Vent (or Vapor Collection) Systems = The fugitive unit contains closed vent or vapor collection systems.</p> <p>Compressors = The fugitive unit contains compressors.</p> <p>Enclosed Combustion Device = The fugitive unit contains enclosed combustion devices.</p> <p>Equipment in VOC Service = The fugitive unit contains equipment designed to operate in VOC service.</p> <p>Flare = The fugitive unit contains flares.</p> <p>Produces Chemicals = The fugitive unit is part of a facility that produces as an intermediate or final product one or more of the chemicals listed in 40 CFR § 60.489.</p> <p>Pumps in Heavy Liquid Service = The fugitive unit does not contain pumps in heavy liquid service.</p> <p>Sampling Connection Systems = The fugitive unit contains sampling connection systems.</p> <p>Valves in Gas/Vapor or Light Liquid Service = The fugitive unit contains valves in gas/vapor or light liquid service.</p> <p>Vapor Recovery System = The fugitive unit does not contain vapor recovery systems.</p> <p>2.0% = The fugitive unit is not complying with an allowable percentage of valves leaking equal to or less than 2.0%.</p> <p>Affected Facility = The fugitive unit is part of a facility that is an affected facility as defined in 40 CFR § 60.480(a)(2).</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for compressors.</p> <p>Vacuum Service = The fugitive unit does not contain equipment in vacuum service.</p> <p>Construction/Modification Date = After January 5, 1981 and on or before November 7, 2006.</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for valves in gas/vapor or light liquid service.</p> <p>Compliance Option = Choosing to comply with the provisions of 40 CFR Part 60, Subpart VV.</p> <p>Complying with 40 CFR § 60.482-10 = Enclosed combustion devices are complying with § 60.482-10.</p> <p>Complying with 40 CFR § 60.482-3 = Compressors are complying with § 60.482-3.</p> <p>Complying with 40 CFR § 60.482-5 = Sampling connection systems are complying with § 60.482-5.</p> <p>Complying with 40 CFR § 60.482-8 = No pumps in heavy liquid service are complying with § 60.482-8.</p> <p>Pumps in Light Liquid Service = The fugitive unit contains pumps in light liquid service.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Complying with 40 CFR § 60.482-7 = Valves in gas/vapor or light liquid service are complying with § 60.482-7.</p> <p>Design Capacity = Site with a design capacity is greater than or equal to 1,000 Mg/yr.</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for pumps in light liquid service.</p> <p>Flanges and Other Connectors = The fugitive unit contains flanges and other connectors.</p> <p>Open-ended Valves or Lines = The fugitive unit contains open-ended valves or lines.</p> <p>Pressure Relief Devices in Gas/Vapor Service = The fugitive unit contains pressure relief devices in gas/vapor service.</p> <p>Valves in Heavy Liquid Service = The fugitive unit does not contain valves in heavy liquid service.</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for open-ended valves or lines.</p> <p>Produces Heavy Liquid Chemicals = The facility produces chemicals other than or in addition to heavy liquid chemicals only from heavy liquid feed or raw materials.</p> <p>Beverage Alcohol Production = The facility does not produce only beverage alcohol.</p> <p>Complying with 40 CFR § 60.482-2 = Pumps in light liquid service are complying with § 60.482-2.</p> <p>Complying with 40 CFR § 60.482-6 = Open-ended valves or lines are complying with § 60.482-6.</p> <p>Complying with 40 CFR § 60.482-8 = Flanges and other connectors are complying with § 60.482-8.</p>	
FUGITIVES	40 CFR Part 60, Subpart VVa	60VVa-1	<p>Compressors = Fugitive unit contains compressors.</p> <p>CVS = Fugitive unit does not contain closed vent systems.</p> <p>Enclosed Combustion Device = Fugitive unit does not contain an enclosed combustion device.</p> <p>Flare = Fugitive unit does not contain flares.</p> <p>Pressure Relief Devices in Heavy or Light Liquid Service = Fugitive unit contains pressure relief devices in heavy or light liquid service.</p> <p>Produces Chemicals = The facility produces, as an intermediate or final product, one or more of the chemicals listed in 40 CFR § 60.489a.</p> <p>Pumps in Heavy Liquid Service = Fugitive unit does not contain pumps in heavy liquid service.</p> <p>Pumps in Light Liquid Service = Fugitive unit contains pumps in light liquid service.</p> <p>Sampling Connection Systems = Fugitive unit does not contain sampling connection systems.</p> <p>Valves in Gas/Vapor or Light Liquid Service = Fugitive unit contains valves in gas/vapor or light liquid service.</p> <p>Vapor Recovery System = Fugitive unit does not contain vapor recovery system.</p> <p>2.0 % = The owner or operator is not electing to comply with an allowable percentage of valves leaking equal to or less than 2.0%.</p> <p>Affected Facility = The facility is an affected facility as defined in 40 CFR § 60.480a(a)(2).</p> <p>EEL = No equivalent emission limitation is used for pumps in light liquid service.</p> <p>Construction/Modification Date = After November 7, 2006.</p> <p>EEL = No equivalent emission limitation is used for valves in gas/vapor or light liquid service.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Compliance Option = Choosing to comply with the provisions of 40 CFR Part 60, Subpart VVa.</p> <p>Complying with 60.482-2a = Pumps in light liquid service are complying with the requirements of § 60.482-2a.</p> <p>Complying with 60.482-3a = Compressors are complying with the requirements of § 60.482-3a.</p> <p>Complying with 60.482-8a = Pressure relief devices in heavy or light liquid service are complying with the requirements of § 60.482-8a.</p> <p>Complying with 60.482-7a = Valves in gas/vapor or light liquid service are complying with the requirements of § 60.482-7a.</p> <p>Connectors in Heavy Liquid Service = Fugitive unit contains connectors in heavy liquid service.</p> <p>Design Capacity = Site with a design capacity greater than or equal to 1,000 Mg/yr.</p> <p>Open-Ended Valves = Fugitive unit does not contain open-ended valves.</p> <p>Pressure Relief Devices in Gas/Vapor Service = Fugitive unit contains pressure relief devices in gas/vapor service.</p> <p>Valves in Heavy Liquid Service = Fugitive unit contains valves in heavy liquid service.</p> <p>EEL = No equivalent emission limitation is used for connectors in heavy liquid service.</p> <p>Facility Type = Facility does not qualify for one of the exemptions in § 60.480a(d).</p> <p>Complying with 60.482-8a = Connectors in heavy liquid service are complying with the requirements of § 60.482-8a.</p>	
FUGITIVES	40 CFR Part 63, Subpart FFFF	63FFFF-1	Existing Source = Fugitive unit contains equipment in a new Miscellaneous Chemical Processing Unit.	
FUGITIVES	40 CFR Part 63, Subpart H	63H-1	<p>ANY (CLOSED VENT SYSTEMS) = COMPONENT PRESENT</p> <p>ANY (OPEN-ENDED VALVES OR LINES) = COMPONENT PRESENT</p> <p>BYPASS LINES = FUGITIVE UNIT CONTAINS ANY CLOSED-VENT SYSTEMS CONTAINING BY-PASS LINES THAT COULD DIVERT A VENT STREAM AWAY FROM THE CONTROL DEVICE AND TO THE ATMOSPHERE</p> <p>ENCLOSED-VENTED PROCESS UNIT AMEL = UNIT DOES NOT CONTAIN A TOTALLY ENCLOSED VENTED PROCESS UNIT COMPLYING WITH AN ALTERNATE MEANS OF EMISSION LIMITATION IN § 63.179</p> <p>EQUIPMENT TYPE = FUGITIVE UNIT CONTAINS EQUIPMENT LISTED IN 40 CFR § 63.160(A) WHICH IS OPERATED IN ORGANIC HAZARDOUS AIR POLLUTANT SERVICE</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>LIGHT LIQUID SERVICE (PUMPS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (PUMPS) = COMPONENT NOT PRESENT</p> <p>NON RESEARCH AND DEVELOPMENT/BATCH PROCESSES = FUGITIVE UNIT CONTAINS PROCESSES OTHER THAN RESEARCH AND DEVELOPMENT FACILITIES AND BENCH-SCALE BATCH PROCESSES</p> <p>RECOVERY OR RECAPTURE DEVICES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>UNSAFE TO INSPECT = FUGITIVE UNIT CONTAINS ANY CLOSED-VENT SYSTEM WITH PARTS</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>DESIGNATED AS UNSAFE TO INSPECT</p> <p>ANY (INSTRUMENTATION SYSTEMS) = COMPONENT PRESENT</p> <p>BATCH PROCESS AMEL = UNIT DOES NOT CONTAIN A BATCH PROCESS UNIT COMPLYING WITH AN ALTERNATE MEANS OF EMISSION LIMITATION IN § 63.178</p> <p>DIFFICULT TO INSPECT = FUGITIVE UNIT CONTAINS ANY CLOSED-VENT SYSTEM WITH PARTS DESIGNATED AS DIFFICULT TO INSPECT</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (VALVES) = COMPONENT PRESENT</p> <p>QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR PUMPS</p> <p>VACUUM SERVICE = NOT ALL OF THE EQUIPMENT IN THE FUGITIVE UNIT IS IN VACUUM SERVICE</p> <p>ANY (COMPRESSORS) = COMPONENT NOT PRESENT</p> <p>EMPLOYEE NUMBER = THE CORPORATION EMPLOYS 100 OR MORE PERSONS</p> <p>ENCLOSED COMBUSTION DEVICES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (INSTRUMENTATION SYSTEMS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (VALVES) = COMPONENT NOT PRESENT</p> <p>LESS THAN 300 OPERATING HOURS = THE FUGITIVE UNIT CONTAINS ANY EQUIPMENT IN ORGANIC HAZARDOUS AIR POLLUTANT (HAP) SERVICE THAT IS INTENDED TO OPERATE LESS THAN 300 HOURS PER CALENDAR YEAR</p> <p>ANY (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT PRESENT</p> <p>GAS VAPOR SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE = NONE OF THE EQUIPMENT IN ORGANIC HAP SERVICE THAT IS INTENDED TO OPERATE LESS THAN 300 HOURS PER CALENDAR YEAR IS IN HEAVY LIQUID SERVICE</p> <p>QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR VALVES</p> <p>AMEL = FUGITIVE UNIT SOURCE OWNER/OPERATOR IS NOT ELECTING TO COMPLY WITH AN ALTERNATIVE MEANS OF EMISSION LIMITATION (AMEL)</p> <p>FLARES (CLOSED VENT SYSTEMS) = COMPONENT PRESENT</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (CONNECTORS) = COMPONENT PRESENT</p> <p>GENERAL AMEL = UNIT IS NOT COMPLYING WITH AN ALTERNATE MEANS OF EMISSION LIMITATION UNDER § 63.177</p> <p>HEAVY LIQUID SERVICE (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT</p> <p>LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (CONNECTORS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT</p> <p>ANY (SAMPLING CONNECTION SYSTEMS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (SAMPLING CONNECTION SYSTEMS) = COMPONENT NOT PRESENT</p> <p>UNITS WITHOUT AMEL = FUGITIVE UNIT EQUIPMENT OR PROCESS UNITS ARE NOT COMPLYING WITH AN ALTERNATE MEANS OF EMISSION LIMITATION.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
GRP-FUGS	40 CFR Part 60, Subpart VV	60VV-1	<p>Produces Chemicals = The fugitive unit is part of a facility that produces as an intermediate or final product one or more of the chemicals listed in 40 CFR § 60.489.</p> <p>Affected Facility = The fugitive unit is not part of a facility that is an affected facility as defined in 40 CFR § 60.480(a)(2).</p>	
301M354	40 CFR Part 63, Subpart Q	63Q-1	Used Compounds Containing Chromium on or After September 8, 1994 = The industrial process cooling tower has not used compounds containing chromium on or after September 8, 1994.	
301M5264	40 CFR Part 63, Subpart Q	63Q-1	Used Compounds Containing Chromium on or After September 8, 1994 = The industrial process cooling tower has not used compounds containing chromium on or after September 8, 1994.	
GRP-SEPARATORS	30 TAC Chapter 115, Water Separation	115B-1	<p>Alternate Control Requirement = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910.</p> <p>Exemption = Water separator does not qualify for exemption.</p> <p>Emission Control Option = The compartment has all openings sealed and totally encloses the liquid contents with gauging and sampling devices that are vapor tight except when in use.</p>	
BLRVENT	30 TAC Chapter 115, Vent Gas Controls	115B-1	<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 = Direct flame incinerator in which the vent gas stream is burned at a temperature or at least 1300° F (704 C).</p> <p>Vent Type = Vent gas stream emissions of the specified classes of VOCs including aldehydes, alcohols, aromatics, ethers, olefins, peroxides, amines, acids, esters, ketones, sulfides, and branched chain hydrocarbons (C8 and above).</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is greater than 100 pounds (45.4 kg).</p> <p>VOC Concentration = VOC concentration is greater than or equal to 30,000 ppmv.</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = Either the VOC concentration or emission rate is greater than the applicable exemption limit at maximum actual operating conditions or the alternate recordkeeping requirements of 30 TAC § 115.126(4) are not being selected.</p>	
BLRVENT	40 CFR Part 63, Subpart FFFF	63FFFF-1	<p>Designated Grp1 = The emission stream is designated as Group 1.</p> <p>Emission Standard = The TRE index is not maintained above the threshold (5.0 for a new source and 1.9 for an existing source) and a non-flare CD is being used to meet 98% reduction per § 63.2455(a) - Table 1.1.a.i.</p> <p>Hal Device Type = No halogen scrubber or other halogen reduction device is used.</p> <p>Meets 63.988(b)(2) = The control device meets criteria in § 63.985(b)(2).</p> <p>Small Device = A small control device (defined in § 63.2550) is not being used.</p> <p>Designated Hal = The emission stream is not designated as halogenated.</p> <p>Prior Eval = The data from a prior evaluation or assessment is not used.</p> <p>Assessment Waiver = The Administrator has not granted a waiver of compliance assessment or no</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>waiver is requested.</p> <p>Determined Hal = The emission stream is determined to be non-halogenated.</p> <p>Alt 63SS Mon Parameters = Alternate monitoring parameters or requirements have not been approved by the Administrator or have not been requested.</p> <p>Formaldehyde = The stream does not contain formaldehyde.</p> <p>Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.</p> <p>Bypass Line = Bypass lines are monitored by flow indicators.</p> <p>CEMS = A CEMS is not used.</p> <p>SS Device Type = Boiler or process heater with a design heat input capacity equal to or greater than 44 megawatts (MW) or in which all vent streams are introduced with the primary fuel or are used as the primary fuel.</p>	
BLRVENT	40 CFR Part 63, Subpart G	63G-1	<p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>Control Device = Boiler or process heater with a design heat input capacity of greater than 44 MW.</p> <p>Overlap = Title 40 CFR Part 60, Subpart NNN</p> <p>Group 1 = The process vent meets the definition of a Group 1 process vent.</p> <p>Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>By-pass Lines = The vent system contains by-pass lines that can divert the vent stream from the control device.</p> <p>Flow Indicator = A flow indicator is installed and operated at the entrance of the by-pass line.</p> <p>Performance Test = A performance test was conducted for determining compliance with a regulation promulgated by the EPA using the same methods specified in Subpart G and either no process changes have been made, or the results reliably indicate compliance.</p>	
FLRVENT	30 TAC Chapter 115, Vent Gas Controls	115B-1	<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 = Vent gas stream emissions of the specified classes of VOCs including aldehydes, alcohols, aromatics, ethers, olefins, peroxides, amines, acids, esters, ketones, sulfides, and branched chain hydrocarbons (C8 and above).</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is greater than 100 pounds (45.4 kg).</p> <p>VOC Concentration = VOC concentration is greater than or equal to 30,000 ppmv.</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = Either the VOC concentration or emission rate is greater than the applicable exemption limit at maximum actual operating conditions</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			or the alternate recordkeeping requirements of 30 TAC § 115.126(4) are not being selected.	
FLRVENT	40 CFR Part 63, Subpart FFFF	63FFFF-1	<p>Designated Grp1 = The emission stream is designated as Group 1.</p> <p>Emission Standard = The TRE index is not maintained above the threshold (5.0 for a new source and 1.9 for an existing source) and a flare is being used for control.</p> <p>Designated Hal = The emission stream is not designated as halogenated.</p> <p>Determined Hal = The emission stream is determined to be non-halogenated.</p> <p>Prior Eval = The data from a prior evaluation or assessment is used.</p> <p>Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.</p> <p>Bypass Line = Bypass lines are monitored by flow indicators.</p>	
FLRVENT	40 CFR Part 63, Subpart G	63G-1	<p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>Control Device = Flare</p> <p>Overlap = Title 40 CFR Part 60, Subpart NNN</p> <p>Group 1 = The process vent meets the definition of a Group 1 process vent.</p> <p>Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>By-pass Lines = The vent system contains by-pass lines that can divert the vent stream from the control device.</p> <p>Flow Indicator = A flow indicator is installed and operated at the entrance of the by-pass line.</p>	
GRP-VENTS1	30 TAC Chapter 111, Visible Emissions	111A-1	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = On or before January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is at least 100,000 actual cubic feet per minute.</p>	
GRP-VENTS2	30 TAC Chapter 111, Visible Emissions	111A-1	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = After January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is at least 100,000 actual cubic feet per minute.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
GRP-DISTILL1	40 CFR Part 60, Subpart NNN	60NNN-1	<p>Subpart NNN Chemicals = The distillation unit produces any chemical listed in 40 CFR § 60.667 as a product, co-product, by-product, or intermediate.</p> <p>Total Resource Effectiveness = TRE index value less than 8.0 not from a halogenated vent stream.</p> <p>Construction/Modification Date = After December 30, 1983.</p> <p>TOC Reduction = Compliance is achieved by reducing total organic compound emissions (less methane and ethane) by 98 weight-percent or to a concentration of 20 ppmv dry basis corrected to 3 percent oxygen using a VOC emissions non-flare combustion control device.</p> <p>Subpart NNN Control Device = Boiler or process heater design heat input capacity greater than or equal to 44 MW (150 MMBtu/hr).</p> <p>Vent Type = A single distillation unit discharging vent stream into a vapor recovery system.</p> <p>Distillation Unit Type = Does not qualify for any exemption under § 60.660(c)(1)-(3).</p> <p>Total Design Capacity = 1 gigagram per year or greater.</p> <p>Vent Stream Flow Rate = Flow rate greater than or equal to 0.008 scm/min.</p>	<p>The following citations under 40 CFR 60 Subpart NNN pertaining to flow monitors have been removed since OXEA has received EPA approval to use monitoring provisions from 40 CFR 60 Subpart RRR instead.</p> <p>Affected pollutant - VOC</p> <p>§60.663(c)</p> <p>§60.633(c)(1)</p> <p>§60.665(d)</p> <p>§60.665(l)(2)</p>
GRP-DISTILL2	40 CFR Part 60, Subpart NNN	60NNN-1	<p>Subpart NNN Chemicals = The distillation unit does not produce any chemical listed in 40 CFR § 60.667 as a product, co-product, by-product, or intermediate.</p>	
GRP-DISTILL3	40 CFR Part 60, Subpart NNN	60NNN-1	<p>Subpart NNN Chemicals = The distillation unit produces any chemical listed in 40 CFR § 60.667 as a product, co-product, by-product, or intermediate.</p> <p>Construction/Modification Date = On or before December 30, 1983.</p>	
GRP-REACTORS1	40 CFR Part 60, Subpart RRR	60RRR-1	<p>Chemicals Listed in 40 CFR § 60.707 = The affected facility is part of a process unit that produces chemicals listed in 40 CFR § 60.707 as a product, co-product, by product, or intermediate.</p> <p>Secondary Fuel = The vent stream is introduced with the combustion air or as a secondary fuel.</p> <p>Total Design Capacity = Total design capacity is 1 gigagram per year (1,100 tons per year) or greater.</p> <p>Bypass Line = There is a bypass line valve that could divert the vent stream around the control device and directly to the atmosphere.</p> <p>Construction/Modification Date = After June 29, 1990.</p> <p>Vent Stream Flow Rate = Vent stream flow rate is 0.011 scm/min or greater, or value is not measured.</p> <p>Affected Facility Type = Combination of a reactor process and the recovery system into which its vent stream is discharged.</p> <p>Bypass Line Valve Secured = The bypass line valve is secured in the closed position with a car-seal or a lock-and-key type configuration.</p> <p>TOC Exemption = No TOC concentration exemption.</p> <p>Control Device = Boiler or process heater with design heat input of 44 MW (150MMBTU/hr) or greater.</p> <p>Subject to Title 40 CFR Part 60, Subpart DDD = The reactor process is not subject to the provisions of Title 40 CFR Part 60, Subpart DDD.</p> <p>Subject to Title 40 CFR Part 60, Subpart NNN = The vent stream is not routed to a distillation unit subject to Title 40 CFR Part 60, Subpart NNN or has other releases to the air than from a pressure relief valve.</p> <p>TRE Index Value = TRE index value is less than or equal to 8.0 or a TRE index value is not calculated or claimed for exemption 40 CFR § 60.700(c)(2).</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			TRE for Halogenated Vent Stream = TRE index value is being calculated for a nonhalogenated vent stream.	
GRP-REACTORS2	40 CFR Part 60, Subpart RRR	60RRR-1	Chemicals Listed in 40 CFR § 60.707 = The affected facility is part of a process unit that produces chemicals listed in 40 CFR § 60.707 as a product, co-product, by product, or intermediate. Construction/Modification Date = On or before June 29, 1990.	
GRP-REACTORS3	40 CFR Part 60, Subpart RRR	60RRR-1	Chemicals Listed in 40 CFR § 60.707 = The affected facility is not part of a process unit that produces chemicals listed in 40 CFR § 60.707 as a product, co-product, by product, or intermediate.	

\* - 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 vs. 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](http://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](http://www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html)

The status of air permits and applications and a link to the Air Permits Remote Document Server is located at the following Web site:

[www.tceq.texas.gov/permitting/air/nav/air\\_status\\_permits.html](http://www.tceq.texas.gov/permitting/air/nav/air_status_permits.html)

<b>Prevention of Significant Deterioration (PSD) Permits</b>	
PSD Permit No.: PSDTX1400	Issuance Date: 01/22/2016
<b>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.</b>	
Authorization No.: 118403	Issuance Date: 01/22/2016
Authorization No.: 2175	Issuance Date: 01/26/2015
Authorization No.: 25299	Issuance Date: 02/05/2016
Authorization No.: 5546	Issuance Date: 04/29/2016
Authorization No.: 6105	Issuance Date: 07/22/2016
<b>Permits By Rule (30 TAC Chapter 106) for the Application Area</b>	
Number: 106.183	Version No./Date: 09/04/2000
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: 106.264	Version No./Date: 09/04/2000
Number: 106.371	Version No./Date: 09/04/2000
Number: 106.373	Version No./Date: 09/04/2000
Number: 106.433	Version No./Date: 09/04/2000
Number: 106.452	Version No./Date: 09/04/2000
Number: 106.454	Version No./Date: 11/01/2001
Number: 106.472	Version No./Date: 03/14/1997
Number: 106.472	Version No./Date: 09/04/2000
Number: 106.473	Version No./Date: 09/04/2000
Number: 106.475	Version No./Date: 09/04/2000
Number: 106.476	Version No./Date: 09/04/2000

Number: 106.478	Version No./Date: 09/04/2000
Number: 106.492	Version No./Date: 09/04/2000
Number: 106.511	Version No./Date: 09/04/2000
Number: 106.512	Version No./Date: 06/13/2001
Number: 106.532	Version No./Date: 09/04/2000
Number: 8	Version No./Date: 11/05/1986
Number: 14	Version No./Date: 11/05/1986
Number: 51	Version No./Date: 07/20/1992
Number: 52	Version No./Date: 11/25/1985
Number: 53	Version No./Date: 07/20/1992
Number: 58	Version No./Date: 01/08/1980
Number: 58	Version No./Date: 09/23/1982
Number: 61	Version No./Date: 08/30/1988
Number: 64	Version No./Date: 09/23/1982
Number: 106	Version No./Date: 04/05/1995
<b>Municipal Solid Waste and Industrial Hazardous Waste Permits With an Air Addendum</b>	
Permit No.: 50398	

### **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 sand-blasting 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:

<b>Unit/Group/Process Information</b>	
ID No.: BLRVENT	
Control Device ID No.: 302M460	Control Device Type: Steam Generating Unit (Boiler)/Process Heater (Design heat input is greater than or equal to 44MW)
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: 115B-1
Pollutant: VOC	Main Standard: § 115.122(c)(1)
<b>Monitoring Information</b>	
Indicator: Period of Operation	
Minimum Frequency: n/a	
Averaging Period: n/a	
Deviation Limit: All periods of operation that are not recorded.	
Basis of CAM: A common way to control VOC emissions is to route emissions to a boiler or process heater with a design heat input capacity of 44 MW or greater with minimum temperatures of 1100 °C and residence times greater than one second. Boilers and process heaters with the stated design have demonstrated to meet 98% reduction efficiency; therefore, it is only necessary to document the period of operation of the control equipment. Additionally, in the October, 21, 1983 preamble to 40 CFR Part 60, Subpart III, (48 FR 48945), the EPA determined that installing a steam generating unit, with a design heat input capacity of 44 MW or greater, to control VOC emissions, is an acceptable means of demonstrating compliance with 40 CFR Part 60, Subpart III and waived the requirement for a performance test on such devices. Monitoring the period of operation of a boiler/process heater greater than 44 MW is commonly required in federal rules, including: 40 CFR Part 60, Subparts III and NNN; 40 CFR Part 61, Subpart BB; 40 CFR Part 63, Subpart G.	

<b>Unit/Group/Process Information</b>	
ID No.: FLRVENT	
Control Device ID No.: 303M1239	Control Device Type: Flare
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: 115B-1
Pollutant: VOC	Main Standard: § 115.122(c)(1)
<b>Monitoring Information</b>	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: n/a	
Deviation Limit: Absence of 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.	

**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:

<b>Unit/Group/Process Information</b>	
ID No.: 302V763	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: 115B-1
Pollutant: VOC	Main Standard: § 115.112(c)(1)
<b>Monitoring Information</b>	
Indicator: Structural Integrity of the Pipe	
Minimum Frequency: Emptied and degassed	
Averaging Period: n/a	
Deviation Limit: Repairs not completed prior to refilling the storage vessel.	
Basis of monitoring: The periodic monitoring option provided for emission units using a submerged fill pipe is location of the submerged fill pipe and structural integrity of the pipe. The location and the integrity of the pipe ensure that loading operations are controlled to prevent splash fill and reduce generated vapors; therefore, less emissions are released to the atmosphere. This approach was included as an option by the EPA in the "Periodic Monitoring Technical Reference Document" (April 1999) to monitor VOC sources.	

<b>Unit/Group/Process Information</b>	
ID No.: 302V763	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: 115B-1
Pollutant: VOC	Main Standard: § 115.112(c)(1)
<b>Monitoring Information</b>	
Indicator: Liquid Level	
Minimum Frequency: At the end of each unloading operation	
Averaging Period: n/a	
Deviation Limit: Fill pipe not submerged.	
<p>Basis of monitoring:  The periodic monitoring option provided for emission units using a submerged fill pipe is location of the submerged fill pipe and structural integrity of the pipe. The location and the integrity of the pipe ensure that loading operations are controlled to prevent splash fill and reduce generated vapors; therefore, less emissions are released to the atmosphere. This approach was included as an option by the EPA in the "Periodic Monitoring Technical Reference Document" (April 1999) to monitor VOC sources.</p>	

<b>Unit/Group/Process Information</b>	
ID No.: GRP-SEPARATORS	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Water Separation	SOP Index No.: 115B-1
Pollutant: VOC	Main Standard: § 115.132(c)(1)
<b>Monitoring Information</b>	
Indicator: VOC Concentration	
Minimum Frequency: Annually	
Averaging Period: n/a*	
Deviation Limit: For potential leak interfaces other than a seal around a shaft that passes through a cover opening, maximum VOC concentration = 500 ppmv. For a seal around a shaft that passes through a cover opening, maximum VOC concentration = 1000 ppmv.	
<p>Basis of monitoring:  It is widely practiced and accepted to monitor the VOC concentration at the outlet of a control device by use of a portable analyzer with procedures such as EPA Test Method 25A or a VOC CEMS. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Outlet VOC concentration has been used as an indicator of VOC emissions in many federal rules including 40 CFR Part 60, Subpart III, 40 CFR Part 60, Subpart NNN, 40 CFR Part 60, Subpart RRR, 40 CFR Part 61, Subpart BB, 40 CFR Part 61, Subpart FF, 40 CFR Part 63, Subpart R, 40 CFR Part 63, Subpart DD, and 40 CFR Part 63, Subpart HH.</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.

<b>Unit/Group/Process Information</b>	
ID No.: GRP-SEPARATORS	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Water Separation	SOP Index No.: 115B-1
Pollutant: VOC	Main Standard: § 115.132(c)(1)
<b>Monitoring Information</b>	
Indicator: Visual Inspection	
Minimum Frequency: Monthly	
Averaging Period: n/a	
Deviation Limit: Any monitoring data that indicates a gap or crack in a sealed opening shall be considered and reported as a deviation.	
<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>	

<b>Unit/Group/Process Information</b>	
ID No.: GRP-TANKS2	
Control Device ID No.: 303M1239	Control Device Type: Flare
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: 115B-1
Pollutant: VOC	Main Standard: § 115.112(c)(1)
<b>Monitoring Information</b>	
Indicator: Pilot Flame	
Minimum Frequency: Once per hour	
Averaging Period: n/a	
Deviation Limit: Absence of pilot flame.	
<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>	

<b>Unit/Group/Process Information</b>	
ID No.: GRP-TANKS2	
Control Device ID No.: 302M3069	Control Device Type: Steam Generating Unit (Boiler)/Process Heater (Design heat input is greater than or equal to 44MW)
Control Device ID No.: 302M331	Control Device Type: Steam Generating Unit (Boiler)/Process Heater (Design heat input is greater than or equal to 44MW)
Control Device ID No.: 302M460	Control Device Type: Steam Generating Unit (Boiler)/Process Heater (Design heat input is greater than or equal to 44MW)
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: 115B-2
Pollutant: VOC	Main Standard: § 115.112(c)(1)
<b>Monitoring Information</b>	
Indicator: Period of Operation	
Minimum Frequency: n/a	
Averaging Period: n/a	
Deviation Limit: All periods that are not recorded shall be considered and reported as a deviation.	
<p>Basis of monitoring:  A common way to control VOC emissions is to route emissions to a boiler or process heater with a design heat input capacity of 44 MW or greater with minimum temperatures of 1100 °C and residence times greater than one second. Boilers and process heaters with the stated design have demonstrated to meet 98% reduction efficiency; therefore, it is only necessary to document the period of operation of the control equipment. Additionally, in the October, 21, 1983 preamble to 40 CFR Part 60, Subpart III, (48 FR 48945), the EPA determined that installing a steam generating unit, with a design heat input capacity of 44 MW or greater, to control VOC emissions, is an acceptable means of demonstrating compliance with 40 CFR Part 60, Subpart III and waived the requirement for a performance test on such devices. Monitoring the period of operation of a boiler/process heater greater than 44 MW is commonly required in federal rules, including: 40 CFR Part 60, Subparts III and NNN; 40 CFR Part 61, Subpart BB; 40 CFR Part 63, Subpart G.</p>	

<b>Unit/Group/Process Information</b>	
ID No.: GRP-TANKS4	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: 115B-1
Pollutant: VOC	Main Standard: § 115.112(c)(1)
<b>Monitoring Information</b>	
Indicator: Internal Floating Roof	
Minimum Frequency: annually	
Averaging Period: n/a	
Deviation Limit: Any monitoring data in which the roof is not floating on surface of the VOC, if liquid has accumulated on the external floating roof, seals are detached, or there are holes or tears in the seal fabric shall be considered and reported as a deviation.	
<p>Basis of monitoring:  The option to monitor VOC emissions by visually inspecting the external floating roof or the internal floating roof was included as an option by the EPA in the "Periodic Monitoring Technical Reference Document" (April 1999) to monitor VOC sources. If the external or internal floating roof is operating in accordance with its design it will meet its control efficiency. Visually inspecting the external floating roof or the internal floating roof is commonly required in federal and state rules, including: 40 CFR Part 60, Subpart Kb; 40 CFR Part 61, Subpart Y; and 30 TAC Chapter 115. Measuring and recording the accumulated area of gaps if the tank is equipped with primary seals is commonly required in federal and state rules, including: 40 CFR Part 60, Subpart Kb; 40 CFR Part 61, Subpart Y; 40 CFR 63 Subparts VV, DD, and MMM; and 30 TAC Chapter 115.</p>	

<b>Unit/Group/Process Information</b>	
ID No.: GRP-VENTS1	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: 111A-1
Pollutant: PM (OPACITY)	Main Standard: § 111.111(a)(1)(C)
<b>Monitoring Information</b>	
Indicator: Visible Emissions	
Minimum Frequency: once per week	
Averaging Period: n/a	
Deviation Limit: There shall be no visible emissions. If visible emissions are observed, the permit holder shall either report a deviation or perform Test Method 9 and opacity shall not exceed 15%.	
<p>Basis of monitoring:  The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations. The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

<b>Unit/Group/Process Information</b>	
ID No.: GRP-VENTS2	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: 111A-1
Pollutant: PM (OPACITY)	Main Standard: § 111.111(a)(1)(C)
<b>Monitoring Information</b>	
Indicator: Visible Emissions	
Minimum Frequency: once per week	
Averaging Period: n/a	
Deviation Limit: There shall be no visible emissions. If visible emissions are observed, the permit holder shall either report a deviation or perform Test Method 9 and opacity shall not exceed 15%.	
<p>Basis of monitoring:  The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations. The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

**Compliance Review**

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on 10/26/2016.

Site rating: 0.00 / High Company rating: 0.58 / Satisfactory

(High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55)

2. Has the permit changed on the basis of the compliance history or site/company rating? .....No

**Site/Permit Area Compliance Status Review**

1. Were there any out-of-compliance units listed on Form OP-ACPS? .....No

2. Is a compliance plan and schedule included in the permit? .....No

**Available Unit Attribute Forms**

- OP-UA1 - Miscellaneous and Generic Unit Attributes
- OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes
- OP-UA3 - Storage Tank/Vessel Attributes
- OP-UA4 - Loading/Unloading Operations Attributes
- OP-UA5 - Process Heater/Furnace Attributes
- OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes
- OP-UA7 - Flare Attributes
- OP-UA8 - Coal Preparation Plant Attributes
- OP-UA9 - Nonmetallic Mineral Process Plant Attributes
- OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes
- OP-UA11 - Stationary Turbine Attributes
- OP-UA12 - Fugitive Emission Unit Attributes
- OP-UA13 - Industrial Process Cooling Tower Attributes
- OP-UA14 - Water Separator Attributes
- OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes
- OP-UA16 - Solvent Degreasing Machine Attributes
- OP-UA17 - Distillation Unit Attributes
- OP-UA18 - Surface Coating Operations Attributes
- OP-UA19 - Wastewater Unit Attributes
- OP-UA20 - Asphalt Operations Attributes
- OP-UA21 - Grain Elevator Attributes
- OP-UA22 - Printing Attributes
- OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes
- OP-UA25 - Synthetic Fiber Production Attributes
- OP-UA26 - Electroplating and Anodizing Unit Attributes
- OP-UA27 - Nitric Acid Manufacturing Attributes
- OP-UA28 - Polymer Manufacturing Attributes
- OP-UA29 - Glass Manufacturing Unit Attributes
- OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical 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