

Statement of Basis of the Federal Operating Permit

TransMontaigne Operating Company L.P.

Site Name: Southwest Terminal
Area Name: Southwest Terminal
Physical Location: 10150 Highway 48
Nearest City: Brownsville
County: Cameron

Permit Number: O3921
Project Type: Initial Issuance

Standard Industrial Classification (SIC) Code: 4226
SIC Name: Special Warehousing and Storage

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). An application for initial permit issuance has been submitted in accordance with 30 TAC § 122.201. 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 26, 2016

Operating Permit Basis of Determination

Permit Area Process Description

The TransMontaigne Operating Company L.P.'s Southwest Terminal is a petroleum and chemical bulk storage facility located in Cameron County, Brownsville, Texas. The terminal stores a variety of products (i.e., gasoline, condensate, distillate fuels, wax, lube oils, and other lower vapor pressure products). The products are brought in via truck, railcar, ship/barge, and pipeline. The product is stored in fixed roof, internal floating roof, and external floating roof petroleum storage tanks. Gasoline is loaded out by truck and ship, with vapors being processed by a flare and John Zink marine vapor combustion unit, respectively. Gasoline is also authorized to be loaded out via rail with emissions controlled by a vapor combustion unit. Emissions generated from the loading of gasoline on to trucks are controlled by a 35 mg/l flare. Emissions generated from the loading of gasoline onto barges are controlled by a 10 mg/l marine vapor combustion unit. Emissions from the truck, rail, and marine loading of distillate and other lower-vapor pressure products are not controlled. The terminal also has several boilers and hot oil heaters to facilitate these operations. Other operations at the terminal can include rail car to tank truck loading operations and site remediation activities.

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
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Reading State of Texas's Federal Operating Permit

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

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

- General Terms and Conditions
- Special Terms and Conditions
 - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
 - Additional Monitoring Requirements
 - New Source Review Authorization Requirements
 - Compliance Requirements
 - Protection of Stratosphere Ozone
 - Permit Location
 - Permit Shield (30 TAC § 122.148)

- Attachments
 - Applicable Requirements Summary
 - Unit Summary
 - Applicable Requirements Summary
 - Additional Monitoring Requirements
 - Permit Shield
 - New Source Review Authorization References
 - Compliance Plan
 - Alternative Requirements
- Appendix A
 - Acronym list

General Terms and Conditions

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

Special Terms and Conditions

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

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

Attachments

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

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

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is

operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

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

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

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

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

Appendix A

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

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

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed either 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.A for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due

to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

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 are 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)	No
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	No
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

Insignificant Activities

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

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

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

Determination of Applicable Requirements

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

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at www.tceq.texas.gov/permitting/air/nav/air_supportsys.html. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*
GRP-TK-A	40 CFR Part 60, Subpart Kb	60kb-0001	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal
GRP-TK-A	40 CFR Part 60, Subpart Kb	60Kb-0002	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.5 psia but less than 0.75 psia Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal
GRP-TK-A	40 CFR Part 60, Subpart Kb	60Kb-0003	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal
GRP-TK-A2	40 CFR Part 63, Subpart BBBBBB	63BBBBBB	Facility Type = Bulk gasoline terminal
GRP-TK-C	40 CFR Part 60, Subpart Ka	60Ka-001	Product Stored = Petroleum liquid (other than petroleum or condensate) Storage Capacity = Capacity is greater than 40,000 gallons (151,416 liters) True Vapor Pressure = TVP is greater than or equal to 1.5 but less than or equal to 11.1 psia Storage Vessel Description = Pontoon-type or double-deck-type external floating roof (EFR) with mechanical shoe primary seal Reid Vapor Pressure = Reid vapor pressure is greater than or equal to 1.0 psia Maximum True Vapor Pressure = Maximum true vapor pressure is greater than 1.0 psia
GRP-TK-C	40 CFR Part 60, Subpart Ka	60Ka-003	Product Stored = Petroleum liquid (other than petroleum or condensate) Storage Capacity = Capacity is greater than 40,000 gallons (151,416 liters) True Vapor Pressure = TVP is less than 1.5 psia Storage Vessel Description = Pontoon-type or double-deck-type external floating roof (EFR) with mechanical shoe primary seal Reid Vapor Pressure = Reid vapor pressure is less than 1.0 psia Maximum True Vapor Pressure = Maximum true vapor pressure is less than or equal to 1.0 psia
GRP-TK-C	40 CFR Part 63, Subpart BBBBBB	63BBBBBB	Facility Type = Bulk gasoline terminal
GRP-TK-D	40 CFR Part 60, Subpart Ka	60Ka-002	Product Stored = Petroleum liquid (other than petroleum or condensate) Storage Capacity = Capacity is greater than 40,000 gallons (151,416 liters) True Vapor Pressure = TVP is greater than or equal to 1.5 but less than or equal to 11.1 psia Storage Vessel Description = Fixed roof with an internal floating-type cover Reid Vapor Pressure = Reid vapor pressure is greater than or equal to 1.0 psia Maximum True Vapor Pressure = Maximum true vapor pressure is greater than 1.0 psia

Unit ID	Regulation	Index Number	Basis of Determination*
GRP-TK-D	40 CFR Part 60, Subpart Ka	60Ka-004	Product Stored = Petroleum liquid (other than petroleum or condensate) Storage Capacity = Capacity is greater than 40,000 gallons (151,416 liters) True Vapor Pressure = TVP is less than 1.5 psia Storage Vessel Description = Fixed roof with an internal floating-type cover Reid Vapor Pressure = Reid vapor pressure is less than 1.0 psia Maximum True Vapor Pressure = Maximum true vapor pressure is less than or equal to 1.0 psia
GRP-TK-D	40 CFR Part 63, Subpart BBBBBB	63BBBBBB	Facility Type = Bulk gasoline terminal
GRP-TK-E	40 CFR Part 60, Subpart Kb	60Kb-0001	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal
GRP-TK-E	40 CFR Part 60, Subpart Kb	60Kb-0002	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.5 psia but less than 0.75 psia Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal
GRP-TK-E	40 CFR Part 60, Subpart Kb	60Kb-0003	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal
GRP-TK-E	40 CFR Part 63, Subpart BBBBBB	63BBBBBB	Facility Type = Bulk gasoline terminal
GRP-TK-E2	40 CFR Part 60, Subpart Kb	60Kb-0001	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal
GRP-TK-E2	40 CFR Part 60, Subpart Kb	60Kb-0002	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.5 psia but less than 0.75 psia Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal
GRP-TK-E2	40 CFR Part 60, Subpart Kb	60Kb-0003	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal
GRP-TK-E2	40 CFR Part 60,	60Kb-0004	Product Stored = Volatile organic liquid

Unit ID	Regulation	Index Number	Basis of Determination*
	Subpart Kb		Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia Storage Vessel Description = Emission controls not required (fixed roof)
GRP-TK-E2	40 CFR Part 63, Subpart BBBBBB	63BBBBBB	Facility Type = Bulk gasoline terminal
TANK 2100	40 CFR Part 60, Subpart K	60K-0001	Construction/Modification Date = After June 11, 1973 And on or before March 8, 1974 Storage Capacity = Capacity is greater than 65,000 gallons (246,052 liters) Product Stored = Petroleum liquid (other than petroleum or condensate) True Vapor Pressure = True vapor pressure is at least 1.5 psia and less than 11.1 psia Storage Vessel Description = Floating roof (internal or external) Reid Vapor Pressure = Reid vapor pressure at least 1.0 psia Estimated True Vapor Pressure = Estimated true vapor pressure is greater than 1.0 psia
TANK 2100	40 CFR Part 60, Subpart K	60K-0002	Construction/Modification Date = After June 11, 1973 And on or before March 8, 1974 Storage Capacity = Capacity is greater than 65,000 gallons (246,052 liters) Product Stored = Petroleum liquid (other than petroleum or condensate) True Vapor Pressure = True vapor pressure is less than 1.5 psia Storage Vessel Description = Emission controls not required Reid Vapor Pressure = Reid vapor pressure is less than 1.0 psia Maximum True Vapor Pressure = Maximum true vapor pressure is 1.0 psia or less
TANK 2100	40 CFR Part 60, Subpart K	60K-0003	Construction/Modification Date = After June 11, 1973 And on or before March 8, 1974 Storage Capacity = Capacity is greater than 65,000 gallons (246,052 liters) Product Stored = Petroleum liquid (other than petroleum or condensate) True Vapor Pressure = True vapor pressure is less than 1.5 psia Storage Vessel Description = Floating roof (internal or external) Reid Vapor Pressure = Reid vapor pressure is less than 1.0 psia Maximum True Vapor Pressure = Maximum true vapor pressure is 1.0 psia or less
LR-1	40 CFR Part 60, Subpart XX	60XX-0001	Construction/Modification Date = After December 17, 1980 Component Replacement = The replacement of components was not commenced before August 8, 1983 in order to comply with any standard adopted by a state or political subdivision thereof. Existing Vapor Processing System = The facility is equipped with an existing vapor processing system. Flare = The facility is using a flare, as defined in 40 CFR § 60.501, to control vapor emissions. Vapor Processing System Type = Intermittent combustion vapor processing system.
LR-1	40 CFR Part 63, Subpart BBBBBB	63BBBBBB	Facility Type = Bulk gasoline terminal

Unit ID	Regulation	Index Number	Basis of Determination*
LR-7	40 CFR Part 60, Subpart XX	60XX-0001	<p>Construction/Modification Date = After December 17, 1980</p> <p>Component Replacement = The replacement of components was not commenced before August 8, 1983 in order to comply with any standard adopted by a state or political subdivision thereof.</p> <p>Existing Vapor Processing System = The facility is equipped with an existing vapor processing system.</p> <p>Flare = The facility is using a flare, as defined in 40 CFR § 60.501, to control vapor emissions.</p> <p>Vapor Processing System Type = Intermittent combustion vapor processing system.</p>
LR-7	40 CFR Part 63, Subpart BBBBBB	63BBBBBB	<p>Facility Type = Bulk gasoline terminal</p>
N-26	40 CFR Part 60, Subpart XX	60XX-0001	<p>Construction/Modification Date = After December 17, 1980</p> <p>Component Replacement = The replacement of components was not commenced before August 8, 1983 in order to comply with any standard adopted by a state or political subdivision thereof.</p> <p>Existing Vapor Processing System = The facility is equipped with an existing vapor processing system.</p> <p>Flare = The facility is using a flare, as defined in 40 CFR § 60.501, to control vapor emissions.</p> <p>Vapor Processing System Type = Intermittent combustion vapor processing system.</p>
N-26	40 CFR Part 63, Subpart BBBBBB	63BBBBBB	<p>Facility Type = Bulk gasoline terminal</p>
OD-5	40 CFR Part 63, Subpart Y	63Y-0001	<p>Subpart Y Facility Type = New onshore loading terminal (located onshore or less than 0.5 miles from shore).</p> <p>Ballasting Operations = Operations other than or in addition to ballasting operations are performed at the facility.</p> <p>Vapor Balancing System = Emissions are not reduced by a vapor balancing system.</p> <p>Documenting Vapor Tightness = Electing to comply with the vapor tightness documentation in 40 CFR 63.567(b)(5)(ii).</p> <p>Vapor Pressure = Vapor pressure is greater than or equal to 10.3 kilopascals (1.5 psia) at standard conditions, 20° C and 760 mm Hg.</p> <p>Subpart BB Applicability = Marine vessel loading operations are not subject to and complying with 40 CFR Part 61, Subpart BB.</p> <p>Subpart Y Control Device Type = Combustion device other than flare or boiler.</p> <p>Material Loaded = Gasoline.</p> <p>HAP Impurities Only = Marine vessel loading operations at loading berths transfer liquids containing organic hazardous air pollutants other than as impurities.</p> <p>Performance Test = Baseline temperature from manufacturer.</p> <p>Alternate Monitoring = Complying with the control device specific monitoring procedures in 40 CFR § 63.564.</p> <p>Source Emissions = Source with emissions less than 10 and 25 tons.</p> <p>Alternate Test Procedure = Complying with the test procedures in 40 CFR § 63.565.</p> <p>Throughput = Source with throughput of 10 M barrels or 200 M barrels.</p> <p>Vent Stream By-Pass = There are no valves that could route displaced vapors to the atmosphere.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
GRP-BL-A	40 CFR Part 60, Subpart Dc	60Dc-0001	<p>Construction/Modification Date = On or before June 9, 1989.</p> <p>Maximum Design Heat Input Capacity = Maximum design heat input capacity is greater than or equal to 10 MMBtu/hr (2.9 MW) but less than or equal to 100 MMBtu (29 MW).</p> <p>Other Subparts = The facility is not covered under 40 CFR Part 60, Subparts AAAA or KKKK, or under an approved State or Federal section 111(d)/129 plan implementing 40 CFR Part 60, Subpart BBBB.</p> <p>Heat Input Capacity = Heat input capacity is greater than 10 MMBtu/hr (2.9 MW) but less than 30 MMBtu/hr (8.7 MW).</p> <p>D-Series Fuel Type = Natural gas.</p> <p>ACF Option - SO2 = Other ACF or no ACF.</p> <p>ACF Option - PM = Other ACF or no ACF.</p>
GRP-BL-C	40 CFR Part 60, Subpart Dc	60Dc-0002	<p>Construction/Modification Date = After June 9, 1989 but on or before February 28, 2005.</p> <p>PM Monitoring Type = No particulate monitoring.</p> <p>Maximum Design Heat Input Capacity = Maximum design heat input capacity is greater than or equal to 10 MMBtu/hr (2.9 MW) but less than or equal to 100 MMBtu (29 MW).</p> <p>SO2 Inlet Monitoring Type = No SO₂ monitoring.</p> <p>Other Subparts = The facility is not covered under 40 CFR Part 60, Subparts AAAA or KKKK, or under an approved State or Federal section 111(d)/129 plan implementing 40 CFR Part 60, Subpart BBBB.</p> <p>SO2 Outlet Monitoring Type = No SO₂ monitoring.</p> <p>Heat Input Capacity = Heat input capacity is greater than 10 MMBtu/hr (2.9 MW) but less than 30 MMBtu/hr (8.7 MW).</p> <p>Technology Type = None.</p> <p>D-Series Fuel Type = Natural gas.</p> <p>47C-Option = COMS exemption § 60.47c(e) for a facility not using post-combustion technology (except a wet scrubber), burns only gaseous fuels or fuel oils that contain no more than 0.5 % by weight sulfur, and emissions of CO are 0.15 lb/MMBtu average.</p> <p>ACF Option - SO2 = Other ACF or no ACF.</p> <p>ACF Option - PM = Other ACF or no ACF.</p>
FLARE 1A	40 CFR Part 60, Subpart A	60XX-0001	<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 requirements in 40 CFR § 60.18(c)(3)(i).</p>
FLARE 1A	40 CFR Part 63, Subpart A	63BBBBBB-0001	<p>Required Under 40 CFR Part 63 = Flare is not required by a Subpart under 40 CFR Part 63.</p>
FLARE 7A	40 CFR Part 60, Subpart A	60XX-0002	<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 = Non-assisted</p> <p>Flare Exit Velocity = Flare exit velocity is less than 60 ft/s (18.3 m/sec)</p>
FLARE 7A	40 CFR Part 63, Subpart A	63BBBBBB-0002	<p>Required Under 40 CFR Part 63 = Flare is not required by a Subpart under 40 CFR Part 63.</p>
MARINE VCU	40 CFR Part 63, Subpart A	63Y-0001	<p>Required Under 40 CFR Part 63 = Flare is not required by a Subpart under 40 CFR Part 63.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
RAIL VCU	40 CFR Part 60, Subpart A	60XX-0003	Subject to 40 CFR § 60.18 = Flare is subject to 40 CFR § 60.18. Adhering to Heat Content Specifications = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4). Flare Assist Type = Non-assisted Flare Exit Velocity = Flare exit velocity is less than 60 ft/s (18.3 m/sec)
RAIL VCU	40 CFR Part 63, Subpart A	63BBBBBB-0003	Required Under 40 CFR Part 63 = Flare is not required by a Subpart under 40 CFR Part 63.
GRP-FUG	40 CFR Part 63, Subpart BBBBBB	63BBBBBB	Facility Type = Bulk gasoline terminal Equipment Components = Equipment components are present
LR-1 FUG	40 CFR Part 63, Subpart BBBBBB	63BBBBBB	Facility Type = Bulk gasoline terminal Equipment Components = Equipment components are present
LR-7 FUG	40 CFR Part 63, Subpart BBBBBB	63BBBBBB	Facility Type = Bulk gasoline terminal Equipment Components = Equipment components are present
N-26 FUG	40 CFR Part 63, Subpart BBBBBB	63BBBBBB	Facility Type = Bulk gasoline terminal Equipment Components = Equipment components are present
BLR-1	30 TAC Chapter 111, Visible Emissions	R1111-0001	Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113. 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. 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). Construction Date = After January 31, 1972 Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.
BLR-2	30 TAC Chapter 111, Visible Emissions	R1111-0001	Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113. 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. 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). Construction Date = On or before January 31, 1972 Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.

Unit ID	Regulation	Index Number	Basis of Determination*
GRP-BL-C	30 TAC Chapter 111, Visible Emissions	R1111-0002	<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 less than 100,000 actual cubic feet per minute.</p>

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

NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. The following table specifies the permits by rule that apply to the site. All current permits by rule are contained in Chapter 106. Outdated 30 TAC Chapter 106 permits by rule may be viewed at the following Web site:

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

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

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

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

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 7195A	Issuance Date: 10/31/2014
Authorization No.: 82038	Issuance Date: 07/13/2007
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.183	Version No./Date: 09/04/2000
Number: 106.262	Version No./Date: 11/01/2003
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.472	Version No./Date: 09/04/2000
Number: 106.478	Version No./Date: 09/04/2000
Number: 106.492	Version No./Date: 09/04/2000

Emission Units and Emission Points

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a 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:

Unit/Group/Process Information	
ID No.: LR-1	
Control Device ID No.: FLARE 1A	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart XX	SOP Index No.: 60XX-0001
Pollutant: TOC	Main Standard: § 60.502(a)
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: n/a	
Deviation Limit: No pilot flame.	
Basis of CAM: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.	

Unit/Group/Process Information	
ID No.: LR-7	
Control Device ID No.: FLARE 7A	Control Device Type: FLARE
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart XX	SOP Index No.: 60XX-0001
Pollutant: TOC	Main Standard: § 60.502(a)
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: n/a	
Deviation Limit: No pilot flame.	
Basis of CAM: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.	

Unit/Group/Process Information	
ID No.: N-26	
Control Device ID No.: RAIL VCU	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart XX	SOP Index No.: 60XX-0001
Pollutant: TOC	Main Standard: § 60.502(a)
Monitoring Information	
Indicator: Inlet Flow Rate	
Minimum Frequency: four times per hour	
Averaging Period: one hour	
Deviation Limit: It shall be considered a deviation if the maximum inlet flowrate is greater than 2,540 scfm.	
Basis of CAM: A common way to monitor a flare is by measuring inlet flow rate and calculating the net heating value of emissions routed to the flare. If the flow rate is too high or if the net heating value is too low, the flare may not maintain a flame or properly combust emissions. Also, measuring the flow rate and net heating value is consistent with the calculation of the net heating value in 40 CFR Part 60, Subpart A. Utilizing the procedures in 40 CFR Part § 60.18(f)(3) to calculate the net heating value of the gaseous fuels is consistent with 40 CFR Part 60, Subpart A.	

Unit/Group/Process Information	
ID No.: N-26	
Control Device ID No.: RAIL VCU	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart XX	SOP Index No.: 60XX-0001
Pollutant: TOC	Main Standard: § 60.502(a)
Monitoring Information	
Indicator: Net Heating Value	
Minimum Frequency: four times per hour	
Averaging Period: one hour	
Deviation Limit: It shall be considered a deviation if the minimum net heating value of gas is greater than 7.45 MJ/scm (200 BTU/scf) for a non-assisted flare, based on an exit velocity of 13.6 ft/sec.	
Basis of CAM: A common way to monitor a flare is by measuring inlet flow rate and calculating the net heating value of emissions routed to the flare. If the flow rate is too high or if the net heating value is too low, the flare may not maintain a flame or properly combust emissions. Also, measuring the flow rate and net heating value is consistent with the calculation of the net heating value in 40 CFR Part 60, Subpart A. Utilizing the procedures in 40 CFR Part § 60.18(f)(3) to calculate the net heating value of the gaseous fuels is consistent with 40 CFR Part 60, Subpart A.	

Periodic Monitoring:

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

Unit/Group/Process Information	
ID No.: BLR-1	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111-0001
Pollutant: PM (OPACITY)	Main Standard: § 111.111(a)(1)(B)
Monitoring Information	
Indicator: Fuel Type	
Minimum Frequency: Annually	
Averaging Period: n/a	
Deviation Limit: Use of alternate fuel.	
Basis of monitoring: Industry has demonstrated through performance tests and historical data that opacity and particulate matter standards are consistently met when combustion units fire natural gas only.	

Unit/Group/Process Information	
ID No.: BLR-2	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111-0001
Pollutant: PM (OPACITY)	Main Standard: § 111.111(a)(1)(A)
Monitoring Information	
Indicator: Fuel Type	
Minimum Frequency: Annually	
Averaging Period: n/a	
Deviation Limit: Use of alternate fuel.	
Basis of monitoring: Industry has demonstrated through performance tests and historical data that opacity and particulate matter standards are consistently met when combustion units fire natural gas only.	

Unit/Group/Process Information	
ID No.: GRP-BL-C	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111-0002
Pollutant: PM (OPACITY)	Main Standard: § 111.111(a)(1)(B)
Monitoring Information	
Indicator: Fuel Type	
Minimum Frequency: Annually	
Averaging Period: n/a	
Deviation Limit: Use of alternate fuel.	
Basis of monitoring: Industry has demonstrated through performance tests and historical data that opacity and particulate matter standards are consistently met when combustion units fire natural gas only.	

Unit/Group/Process Information	
ID No.: GRP-TK-D	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart Ka	SOP Index No.: 60Ka-002
Pollutant: VOC	Main Standard: § 60.112a(a)(2)
Monitoring Information	
Indicator: Internal Floating Roof	
Minimum Frequency: annually	
Averaging Period: n/a	
Deviation Limit: It shall be reported as a deviation if roof is not floating on the surface of the VOC, if liquid is on top of the IFR, if seals are detached, or if there are holes or tears in the seal fabric.	
<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>	

Unit/Group/Process Information	
ID No.: TANK 2100	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart K	SOP Index No.: 60K-0001
Pollutant: VOC	Main Standard: § 60.112(a)(1)
Monitoring Information	
Indicator: Internal Floating Roof	
Minimum Frequency: annually	
Averaging Period: n/a	
Deviation Limit: It shall be reported as a deviation if roof is not floating on the surface of the VOC, if liquid is on top of the IFR, if seals are detached, or if there are holes or tears in the seal fabric.	
<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>	

Compliance Review

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

Site rating: 0.25 / Satisfactory Company rating: 0.12 / 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? Yes

2. Is a compliance plan and schedule included in the permit? Yes

Permit reviewer notes:

NSR Permit 7195A amendment is under review requesting that storage tanks TNAK 1003 and TANK 1004 be included in either a fixed roof group or a floating roof group and that an emissions limit be established for each group rather than an emissions limit being established for each individual tank.

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