

**Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary
Form OP-SUM Instructions**

General:

All units and processes addressed in the application for a permit under Title 30 Texas Administrative Code Chapter 122 (30 TAC Chapter 122) must be listed on this form. The term “unit” in these instructions has the meaning of “emission unit” as defined in 30 TAC Chapter 122. The term “process” refers to a collection of units or devices that have a physical relationship, or source cap, where a regulatory requirement is potentially applicable to the process as a whole.

The purpose of this form is to list individual units and processes addressed in the initial Federal Operating Permit (FOP) application and to provide identifying information and preconstruction authorizations. (Form OP-SUMR should be used for revisions and renewals.) This form is also used to designate members of groups.

The following units and processes are required to be listed:

- Units or processes with one or more potentially applicable requirements as indicated by a corresponding unit attribute (UA) form;
- Units or processes for which a permit shield for one or more potentially applicable requirements is being requested on Form OP-REQ2 (For details, see Form OP-REQ2, Negative Applicable Requirement Determinations); and
- Units or processes listed on Form OP-ACPS, Application Compliance Plan and Schedule.

Units or processes for which the only potentially applicable requirement is a New Source Review (NSR) authorization and no additional monitoring is required are not required to be listed on Form OP-SUM, except when required due to appearance on Form OP-ACPS.

Note: The NSR authorization(s) covering these units and processes must be identified in Section XII of Form OP-REQ1, Application Area-Wide Applicability Determinations and General Information.

The corresponding preconstruction authorization for each unit and process addressed in the application must also be listed on this form. For units or processes which were authorized to construct or modify under Permits by Rule (PBR), list all applicable PBR information. If a unit or process is authorized under more than one preconstruction authorization, then list all applicable preconstruction authorizations, including any Prevention of Significant Deterioration (PSD) and/or nonattainment permit(s).

Groups:

- A “group” is a collection of units or devices that have identical applicability (or non-applicability) determinations and may, or may not, have a physical relationship.
- Group members may have different 30 TAC Chapter 116 or 30 TAC Chapter 106 preconstruction authorizations.
- Groups may be used on UA forms only if all unit attributes are identical.
- Flares cannot be grouped.
- All groups must be mutually exclusive. Units cannot be listed in more than one group on a given UA form.
- Grouping is optional.
- Groups are assigned an ID No. by the applicant, which must begin with the prefix “GRP” followed by a maximum of seven characters (GRPXXXXXX).

Processes:

- A “process” is a quasi-unit representing a collection of units or devices that have a physical relationship and for which a regulatory requirement applies to the process as a whole.
Example: Title 40 Code of Federal Regulations Part 60, Subpart LLL (40 CFR Part 60, Subpart LLL) would apply to a process consisting of a sweetening unit, followed by a sulfur recovery unit. But it would not be appropriate to represent 40 CFR Part 60, Subpart LLL as applying to the individual member units, therefore the “process” is designated to represent this applicability.
- Individual units in a process do not need to be identified unless they have potentially applicable requirements unto themselves. Use multiple lines to identify such units.
- The Process ID must appear as an entry in the Unit ID No. column of Form OP-SUM, and a Name/Description and Preconstruction Authorization information must be provided.
- Processes are assigned an ID No. by the applicant, which must begin with the prefix “PRO” followed by seven or less characters (PROXXXXXXX).
- The UA forms that are applicable to processes will ask for the Process ID No., instead of the Unit ID No.

The Company Name and Area name (from Form OP-1, Section I and X, respectively) must appear in the header of each page for the purpose of identification. The date of submittal must also be included, and should be consistent throughout the application (MM/DD/YYYY). Any subsequent submittals must show the date of revision. Also, enter the Regulated Entity Reference Number (RNXXXXXXXX) and (FOP) Permit Number (OXXXX), if assigned.

Specific:**Table 1**

Unit/Process ID No.: Each unit or process must be assigned an identification number. (Maximum 10 characters)

- For emission **units and processes** with potentially applicable requirements, enter the Facility ID Nos. (FINs) as listed in the TCEQ State of Texas Air Reporting System (STARS);
- For emission **points** with potentially applicable requirements, enter the emission point numbers (EPNs) as listed in the STARS; or
- If the FIN or EPN currently does not exist in the STARS, then a new ID No. that is consistent with the existing numbering system must be provided by the applicant.
- If a unit is included in the application strictly as a result of its appearance on Form OP-ACPS, then follow the instructions for Form OP-ACPS when selecting an appropriate ID No.
- Unit/Process ID Nos. cannot begin with “GRP” (the character sequence reserved for Group ID Nos.), and must begin with “PRO” when a Process ID No. is required.

Note: Due to differences between the TCEQ Air Permits Division and TCEQ Industrial Emissions Assessment Section, identification numbers for fugitive sources designated for 30 TAC Chapter 122 purposes may be different than those used for STARS purposes.

If there is no difference between the fugitive area defined for 30 TAC Chapter 122 purposes and the fugitive area used for STARS purposes, enter the fugitive ID No. as listed in the STARS.

If a difference exists because new fugitive areas have been created for 30 TAC Chapter 122 purposes, or if the fugitive area has not been assigned an ID No. in the STARS, then a new ID No. that is consistent with the existing numbering system must be provided by the applicant.

Applicable Form: Enter the number of the UA form which contains the specific information regarding the corresponding emission unit, emission point, or process.

- List the Unit Attribute (UA) form number corresponding to the type of unit or process (OP-UA XX), e.g. “OP-UA7” for a flare. The UA form number should be listed unless one of the following conditions below is met. If a Unit ID No. appears on multiple unit attribute forms, the Unit ID should be repeated on this form, which each unit attribute form listed once as the Applicable Form.
See www.tceq.texas.gov/permitting/air/nav/air_ua_forms.html for a list of UA forms.
- If the unit is included in the application strictly as a result of its appearance on Form OP-ACPS (Application Compliance Plan and Schedule), **and** the unit does not appear on any UA form, “OP-ACPS” may be entered as the Applicable Form. If the unit is included in the application strictly as a result of a negative applicability determination, **and** the unit does not appear on any UA form for positive or negative determinations, “OP-REQ2” may be entered as the Applicable Form. If the unit appears on any unit attribute form, do not list OP-REQ2 as an Applicable Form.

Note: The Applicable Form is used to designate the Unit Type that will appear in the Unit Summary of the FOP. Also, each combination of Unit/Process ID No. and Applicable Form is considered a distinct unit or process within the FOP. For example, UNITX/OP-UA6 and UNITX/OP-UA15 are considered distinct units in the application and must be addressed separately in application updates, revisions, or renewals.

Unit/Process Name/Description: Each unit or process must be given a name or description that distinguishes it from other units as much as practicable. The Unit/Process Name/Description should clearly indicate the type of unit. If possible, please avoid using generic descriptions, such as “Tank” or “Boiler,” for multiple units.
(Maximum 50 characters)

- Enter a text name or description for the unit or process from the STARS whenever possible.
- If no STARS name currently exists, a new name that is consistent with the existing naming convention must be provided by the applicant.

CAM: (*For reference only*): Indicate if the unit is subject to 40 CFR Part 64 by placing an “X” in the “CAM” column next to the unit. Please refer to 40 CFR Part 64 to determine applicability. *Certification by the Responsible Official (RO) pursuant to 30 TAC § 122.165 does not extend to the information which is designated on forms as “For reference only.”*

Preconstruction Authorizations: At least one preconstruction authorization must be indicated for each unit; however, a unit may have multiple authorizations. *All preconstruction authorizations listed on this form must also be identified on Form OP-REQ1.*

30 TAC Chapter 116/30 TAC Chapter 106: List all 30 TAC Chapter 116 or 30 TAC Chapter 106 preconstruction authorizations under which the unit or process is operating. Use additional lines to list multiple authorizations.

Permit Number: Enter the TCEQ NSR permit number(s) (XXXXX), for example, 12345. This includes special permits and standard permit registrations. Do not enter PSD permits and nonattainment permits.

Permit by Rule (*previously called Standard Exemption*): For each PBR claimed or registered under 30 TAC Chapter 106, and each standard exemption claimed or registered previously under 30 TAC Chapter 116, enter the number and effective date in the appropriate format shown below.

Format	PBR/standard exemption claimed or registered date
106.XXX/MM/DD/YYYY	Authorized on or after March 14, 1997 (except 106.181 is on or after December 27, 1996)
XXX/MM/DD/YYYY	Authorized prior to March 14, 1997

XXX = 30 TAC Chapter 116 standard exemption number or 30 TAC Chapter 106 PBR number.
MM/DD/YYYY = Effective date of the Standard Exemption or PBR in effect at the time claimed or granted.

Information on Chapter 116 version dates is available at www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html.
 Information on Chapter 106 version dates is available at www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html.

Examples: Standard exemptions and PBRs would be reflected in Form OP-SUM as follows:

Authorization	Std. Ex./PBR No.	Date Authorized	Format
Authorized on or after November 15, 1996	106.473	July 25, 1997	106.473/03/14/1997
Authorized prior to November 15, 1996	53	October 20, 1990	53/09/12/1989

Please note that prior to March 14, 1997, a standard exemption list was incorporated by reference into 30 TAC Chapter 116 and each standard exemption had an assigned number, e.g., 112. Each standard exemption now resides in a section of 30 TAC Chapter 106 (e.g., 30 TAC § 106.148) and now is referred to as a PBR. (Standard exemptions were readopted under the PBR designation on March 14, 1997.) Information regarding PBRs may be found on the TCEQ website at www.tceq.texas.gov/permitting/air/nav/air_pbr.html.

The applicant has the option of claiming a newer and more stringent version of the standard exemption or PBR if the original applicable version of the standard exemption or PBR cannot easily be determined. As an example of a standard exemption authorized before March 14, 1997, Standard Exemption No. 6 had an effective date of August 30, 1988. It was then amended with a new effective date of July 20, 1992. The standard exemption identifier for a compressor engine constructed in 1993 and registered under Standard Exemption No. 6 would be represented as 6/07/20/1992.

As an example of a PBR authorized on or after November 15, 1996, Standard Exemption No. 6 had an effective date of June 7, 1996. It was then amended and moved to 30 TAC § 106.512 with an effective date of March 14, 1997. The PBR identifier for a compressor engine constructed in 1998 and registered under 30 TAC § 106.512 would be represented as 106.512/03/14/1997.

Title I: List all Title I preconstruction authorizations (PSD and nonattainment permits) for which the unit is operating. Use multiple lines to list all authorizations. The format of the entry is based on the types of authorization, below. *Title I authorizations should only be listed for units addressed by the PSD or nonattainment permits.*

Prevention of Significant Deterioration (PSD) Permit: Enter the PSD permit number (PSDTXXXX), for example, PSDTX123. If the PSD permit has been modified, include the “M” suffix (PSDTXXXXMXX), for example, PSDTX123M5.

Nonattainment Permit: Enter each nonattainment permit number (NXXX), for example, N123. If the nonattainment permit has been modified, include the “M” suffix (NXXXMXX), for example, N123M5.

Group ID No.: If applicable, enter the unique identification number for the group which includes this unit (GRPXXXXXXXX). If the unit is not a member of a group, leave this column blank. (See general instructions, above, for information regarding requirements for grouping units in FOP applications.)

Examples: The following examples are intended as guidance on completion of columns on Form OP-SUM for various situations. It should be assumed that units in these examples meet all criteria for inclusion in the application, and appear on UA forms. Criteria for grouping are also assumed to be satisfied.

- Two boilers and their associated stack with flow rates greater than 100,000 acfm:

FIN	EPN	Facility Name	Point Name
B-1	B-1-STK	BOILER 1	BOILER 1 STACK
B-2	B-2-STK	BOILER 2	BOILER 2 STACK

- A floating roof tank that is part of a polymer manufacturing process (process identification number PRO-POLY), which also has additional applicable requirements unto itself:

FIN	EPN	Facility Name	Point Name
T-3	T-3	TANK 3	TANK 3

- A process fugitive area:

FIN	EPN	Facility Name	Point Name
FUG-1	FUG-1	FUGITIVES	FUGITIVES

The units, groups, and processes would be reflected in Form OP-SUM as follows (*CAM and Preconstruction Authorizations are not shown*):

Unit/Process ID No.	Applicable Form	Unit Name/Description	Group ID No.
B-1	OP-UA6	Boiler 1	GRP-BOILER
B-1-STK	OP-UA15	Boiler 1 Stack	GRP-STACK
B-2	OP-UA6	Boiler 2	GRP-BOILER
B-2-STK	OP-UA15	Boiler 2 Stack	GRP-STACK
PRO-POLY	OP-UA28	Polymer Manufacturing Process	
T-3	OP-UA3	Tank 3	
FUG-1	OP-UA12	Process Fugitives	

Table 2

Complete Table 2 only for Affected Sources that are subject to the following Program(s): Acid Rain and/or Cross-State Air Pollution Rule (CSAPR), and/or Texas SO₂ Trading Program.

General:

The Acid Rain Program Permit Requirements, as defined in 30 TAC Chapter 122, Subchapter E, require that the Designated Representative (DR) or Alternate Designated Representative (ADR) submit a permit application for each facility (affected source) with an affected unit. A complete permit application is binding on the owners and operators of the affected source and is enforceable in the absence of a permit until the permitting authority either issues a permit to the

source or disapproves the application. The responsibilities of the Designated Representative and Alternate Designated Representative of a CSAPR source, as defined in 40 CFR Part 97 (CSAPR NO_x and SO₂ Trading Programs), require that each submission under an applicable CSAPR Trading Program shall be made, signed, and certified by the Designated Representative or Alternate Designated Representative for each CSAPR source and CSAPR unit for which the submission is made.

Any reference in these instructions to the Designated Representative (DR) means the Acid Rain Designated Representative and/or the CSAPR Designated Representative, as applicable. Any reference to the Alternate Designated Representative (ADR) means the Alternate Acid Rain Designated Representative and/or the Alternate CSAPR Designated Representative, as applicable. As reflected in this form, the Acid Rain Designated Representative and the CSAPR Designated Representative for a facility (source) must be the same individual, and the Alternate Acid Rain Designated Representative and the Alternate CSAPR Designated Representative for a source must be the same individual, if such a source has units subject to the Acid Rain and CSAPR Programs.

Affected Source Plant Code: A plant code is a 4 or 5 digit number assigned by the Department of Energy (DOE) Energy Information Administration (EIA) to plants that generate electricity. For older plants, “plant code” is synonymous with “ORISPL” and “facility” codes. If the plant generates electricity but no plant code has been assigned, or if there is uncertainty regarding what the plant code is, send an email to the EIA at EIA-860@eia.gov. For plants that do not produce electricity, use the plant identifier assigned by EPA (beginning with “88”). If the plant does not produce electricity and has not been assigned a plant identifier, contact Laurel DeSantis at desantis.laurel@epa.gov.

Specific:

Unit ID No.: Each affected unit must be assigned an identification number (maximum 10 characters). The identification number listed on Table 2 must be the same as the identification number listed on Table 1 of this form for the same unit.

Note: There may be differences between the Unit ID No. on the OP-SUM and unit names from other sources such as EPA COR, EIA (ORIS), TCEQ SIP lists, etc. However, the Unit ID No. utilized for OP-SUM, Table 2 must be consistent with those given on the OP-SUM, Table 1.

Applicable Form: Enter the number of the applicable UA form used on the first table of the OP-SUM for the corresponding Unit ID No. If there is no applicable form listed on the first table of the OP-SUM for the corresponding Unit ID, enter OP-UA1.

COR Unit ID No.: Enter the unit identification number (maximum 10 characters) that is listed on the EPA Certificate of Representation (COR).

Acid Rain: Enter “YES,” for an affected unit subject to the Acid Rain Program (ARP). Otherwise, enter “NO.”

ARP Status: Select one of the following options that describe the ARP status for that unit. Enter the code on the form.

Code	Description
EU	An existing affected unit with an existing Acid Rain permit
NEW	A new affected unit that does not have an existing Acid Rain permit (Applicant must also submit Form OP-AR1.)
RENEW	An existing affected unit with an existing Acid Rain permit for which the applicant is applying for a renewal (Applicant must also submit Form OP-AR1.)
NEXM	Applying for a new unit exemption under 40 CFR 72.7 (Applicant must also submit required additional information in a separate cover letter.)
REXM	Applying for a retired unit exemption under 40 CFR 72.8 (Applicant must also submit required additional information in a separate cover letter.)
OPT	A unit that is not an affected unit requiring an Acid Rain permit but applicant is electing to become an affected unit as an "OPT-IN" in the Acid Rain program under 40 CFR Part 74 (Applicant must also submit required additional information in a separate cover letter.)

CSAPR: Enter "YES," if the unit is subject to the requirements of 40 CFR Part 97, Subpart EEEEE (CSAPR NO_x Ozone Season Group 2 Trading Program). Otherwise, enter "NO."

CSAPR Monitoring: Select one of the following options that describe the CSAPR NO_x Ozone Season Group 2 monitoring for that unit. Enter the code on the form.

Code	Description
CEMS	A unit that is complying with the CEMS requirements of 40 CFR Part 75, Subpart H for NO _x and heat input.
CEMSD	A gas or oil fired unit that is complying with the CEMS requirements of 40 CFR Part 75, Subpart H for NO _x , and with the monitoring requirements of 40 CFR Part 75, Appendix D for heat input.
PEAK	A gas or oil fired peaking unit that is complying with the monitoring requirements of 40 CFR Part 75, Appendix E for NO _x , and with the monitoring requirements of 40 CFR Part 75, Appendix D for heat input.
LME	A gas or oil fired unit that is complying with the Low Mass Emissions monitoring requirements of 40 CFR § 75.19 for NO _x and heat input.
ALTMON	A unit that is complying with EPA-approved alternative monitoring system requirements of 40 CFR Part 75, Subpart E for NO _x and heat input.
REXM	Applying for a retired unit exemption under 40 CFR Part 97, Subpart EEEEE (CSAPR NO _x Ozone Season Group 2 Trading Program) (Applicant must also submit required additional information in a separate cover letter).

Texas SO₂: Enter "YES," if the unit is complying with the requirements of 40 CFR Part 97, Subpart FFFFF (Texas SO₂ Trading Program). Otherwise, enter "NO."

Texas SO₂ Monitoring: Select one of the following options that describe the Texas SO₂ monitoring for that unit. Enter the code on the form.

Code	Description
CEMS	A unit that is complying with the CEMS requirements of 40 CFR Part 75, Subpart B for SO ₂ and 40 CFR Part 75, Subpart H for heat input.
CEMSD	A gas or oil fired unit that is complying with the monitoring requirements of 40 CFR Part 75, Appendix D for SO ₂ and heat input.
LME	A gas or oil fired unit that is complying with the Low Mass Emissions monitoring requirements of 40 CFR § 75.19 for SO ₂ and heat input.
ALTMON	A unit that is complying with EPA-approved alternative monitoring system requirements of 40 CFR Part 75, Subpart E for SO ₂ and heat input.
REXM	Applying for a retired unit exemption under 40 CFR Part 97, Subpart FFFFF (Texas SO ₂ Trading Program) (Applicant must also submit required additional information in a separate cover letter.)

OP-SUM Instructions

COR: Enter “YES,” to indicate that the applicant has submitted the COR to the EPA for the Acid Rain and CSAPR programs, as applicable, and has included a copy of the required COR to the TCEQ with this submittal. (Providing the required COR copy to TCEQ authorizes the DR (or ADR) to sign Form OP-CRO1, page 2, to certify Acid Rain and CSAPR program application submittals.)

Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary
Form OP-SUM
Table 1

Date:	Regulated Entity No.:	Permit No.:
Company Name:		Area Name:

Unit/Process ID No.	Applicable Form	Unit Name/Description	CAM	Preconstruction Authorizations 30 TAC Chapter 116/30 TAC Chapter 106	Preconstruction Authorizations Title I	Group ID No.

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Federal Operating Permit Program
Individual Unit Summary
Form OP-SUM**

Table 2: Acid Rain, Cross-State Air Pollution Rule (CSAPR), and Texas SO₂ Trading Program

Date:	Regulated Entity No.:	Permit No.:
Company Name:	Area Name:	Affected Source Plant Code:

Unit ID No.	Applicable Form	COR Unit ID No.	Acid Rain	ARP Status	CSAPR	CSAPR Monitoring	Texas SO ₂	Texas SO ₂ Monitoring	COR