Texas Commission on Environmental Quality Federal Operating Permit Program Individual Unit Summary for Revisions Form OP-SUMR Instructions

General:

This form is used for federal operating permit (FOP) revision and renewal applications only. FOP revision and renewal applications must include Form OP-2 (Application for Permit Revision/Renewal), at a minimum.

As a general procedure, when applying for a FOP revision or renewal, only the changes that are the subject of the revision need to be addressed in this form. For the preconstruction authorization section, only include information for the new or changed preconstruction authorization numbers.

The term "unit" in these instructions have the meaning of "emission unit" as defined in Title 30 Texas Administrative Code Chapter 122 (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. Additional information on process is discussed on Form OP-SUM. Units and processes must be identified when they are to be added to or removed from the permit, or when they are to be added to or removed from a group.

For information regarding units, groups and processes that must be addressed in an application and information regarding preconstruction authorizations, refer to Form OP-SUM (Individual Unit Summary), the Unit Attribute (UA) forms (which are located at www.tceq.texas.gov/permitting/air/nav/air all ua forms.html), or the TCEQ guidance document located at www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title V/additional for guidance.pdf.

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 (RNXXXXXXXXX) and (FOP) Permit Number (OXXXX).

Specific:

Table 1

Complete Table 1 if the revision is adding a new emission unit, emission point, or process or deleting an existing emission unit, emission point, or process. Table 2 is not required unless the revision includes an emission unit, emission point, or process being added to or deleted from a group.

Deleting a unit on this form will also serve to delete the unit from a group as well as delete any associated requirements in the Applicable Requirements Summary in the issued permit. These deletions will not need to be represented on Form OP-REO3 (Applicable Requirements Summary).

Unit/Process

Action Indicator (AI):

Enter "A" if the emission unit, emission point, or process indicated is an addition to the existing permit. Enter "D" if the existing emission unit, emission point, or process indicated is being deleted from the permit. If an emission unit, emission point, or process is not being added/deleted from the permit, leave blank.

Revision No.:

Enter the revision number identified on Form OP-2, Table 2. This number will link the specified change to the appropriate permit revision.

ID No.:

For emission units, processes, or emission points with potentially applicable requirements that are being added to the permit, enter the facility identification numbers (FINs) or emission point numbers (EPNs) as listed in the TCEQ State of Texas Air Reporting System (STARS). If the FIN or EPN currently does not exist in the STARS, then a new identification number (ID No.) that is consistent with the existing numbering system must be provided by the applicant. For existing units, enter the ID No. that is currently identified in the issued federal operating permit.

Note: The ID Nos. listed in the "ID No." column <u>cannot</u> begin with "GRP," the character sequence reserved for group ID Nos.

Applicable Form:

Enter the number of the UA form which contains the specific information regarding the corresponding emission unit, emission point, or process (i.e., for flares, enter OP-UA7 entitled "Flare Attributes"). See www.tceq.texas.gov/permitting/air/nav/air all ua forms.html for a list of UA forms. Enter the UA Form number if the UA form is used in conjunction with Form OP-REQ2 for negative applicability or if the emission unit, emission point, or process has positive applicability in addition to the negative applicability. Enter "OP-REQ2" if all of the following are true:

- 1. negative applicability is shown through the use of Form OP-REQ2;
- 2. no unit attribute information is used to substantiate the negative applicability; and
- 3. the emission unit, emission point, or process has no positive applicability.

The applicable form entered on Form OP-REQ2 must match the applicable form entered on Form OP-SUMR for the emission unit, emission point, or process.

Name/Description:

For emission units, emission points, or processes being added to the permit, enter a text name or description for the unit from the STARS whenever possible (maximum 50 characters). If no STARS name currently exists, a new name that is consistent with the existing naming convention must be provided by the applicant.

★ Complete "CAM" only if the revision incorporates requirements for 40 CFR Part 64, Compliance Assurance Monitoring (CAM).

The following question relating to CAM is for reference only. Certification by the Responsible Official (RO) pursuant to 30 TAC § 22.165 does not extend to the information which is designated on forms as "for reference only."

CAM:

Indicate if the unit is subject to CAM, by placing a "Y" in the box next to the unit. Please refer to 40 CFR Part 64 to determine applicability.

Note: For each new emission unit or emission point, at least one preconstruction authorization must be indicated; however, an emission unit or emission point may have multiple authorizations. Preconstruction authorizations listed on this form should 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, including PBR registration numbers, under which the unit or process is operating. Use additional lines to list multiple authorizations.

- 1. **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.
- 2. **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.

Note: If units authorized by PBRs are being added or deleted or PBR registration numbers are being added or deleted, these changes must also be identified on Form OP-PBRSUP.

Format PBR/Standard Exemption Claimed or Registered Date

106.XXX/MM/DD/YYYY[rrrr] Authorized on or after March 14, 1997 (except 106.181 is on or after

December 27, 1996)

XXX/MM/DD/YYYY[rrrr] Authorized prior to March 14, 1997

Format XXX = 30 TAC Chapter 116 standard exemption number or 30 TAC Chapter

106 PBR number.

MM/DD/YYYY = Standard exemption or PBR effective date, approval date, or modification completion date.

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.

[rrrr] = Registration number for the authorization. If multiple registration numbers apply, list them separated by commas. Examples: Standard exemptions and PBRs would be reflected in Form OP-SUMR as follows:

| Authorization | Std. Ex./PBR No. | Date Authorized | Format | |
|---------------------------------------|------------------|------------------|--------------------------------|--|
| Authorized on or after March 14, 1997 | 106.473 | July 25, 1997 | 106.473/03/14/1997[1010, 2020] | |
| Authorized prior to March 14, 1997 | 53 | October 20, 1990 | 53/09/12/1989[1010, 2020] | |

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). Standard exemptions moved into 30 TAC Chapter 106 on March 14, 1997. Each standard exemption now resides in a section of 30 TAC Chapter 106 (e.g., 30 TAC § 106.148) and is now referred to as a PBR. 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[rrrr], where [rrrr] is the registration number. As an example of a PBR authorized on or after March 14, 1997, 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[rrrr], where [rrrr] is the registration number.

Also, please note that as of August 1, 2020, PBR registration numbers are required to be submitted on this form.

Title I

List all Title I preconstruction authorization (PSD and nonattainment permits) for which the unit is operating. Use multiple lines to list all authorizations. If no Title I preconstruction authorizations apply to the unit, please leave this field blank.

- 1. **Prevention of Significant Deterioration (PSD) Permit:** Enter the PSD permit number (PSDTX*XXX*), for example, PSDTX123. If the PSD permit has been modified, include the "M" suffix (PSDTX*XXX*M*XX*), for example, PSDTX123M5.
- 2. **Nonattainment Permit:** Enter each nonattainment permit number (NXXXXX), for example, N123. If the nonattainment permit has been modified, include the "M" suffix (NXXXMXX), for example, N123M5.

Table 2

Complete Table 2 only if an emission unit, emission point, or process is being added to or deleted from a group.

Revision No.:

Enter the revision number identified on Form OP-2, Table 2. This number will link the specified change to the appropriate permit revision.

ID No.:

Enter the identification numbers (ID No.) as listed on Table 1 for the emission units, processes, or emission points. If Table 1 is not required, for emission units, processes, or emission points being added to the permit, enter the FINs or EPNs as listed in the STARS for emission units, processes, or emission points with potentially applicable requirements. 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. For existing units, enter the ID No. that is currently identified in the issued federal operating permit.

Note: The ID Nos. listed in the "ID No." column <u>cannot</u> begin with "GRP," the character sequence reserved for group ID Nos.

Applicable Form:

Enter the number of the UA form which contains the specific information regarding the corresponding emission unit, emission point, or process (i.e., for flares, enter OP-UA7 entitled "Flare Attributes"). See www.tceq.texas.gov/permitting/air/nav/air all ua forms.html for a list of UA forms. Enter "OP-ACPS," if the unit ID No. is entered on this form, strictly as a result of completing Form OP-ACPS and no UA form is submitted (see Form OP-ACPS instructions for additional guidance). Enter the UA form number if the UA form is used in conjunction with Form OP-REQ2 for negative applicability, or if the emission unit, emission point, or process has positive applicability in addition to the negative applicability. Enter "OP-REQ2" if all of the following are true:

- 1. negative applicability is shown through the use of Form OP-REQ2;
- 2. no unit attribute information is used to substantiate the negative applicability; and
- 3. the emission unit, emission point, or process has no positive applicability.

The applicable form entered on Form OP-REQ2 must match the applicable form entered on form OP-SUMR for the emission unit, emission point, or process.

Group AI:

Enter "A" if the emission unit, emission point, or process identified in the "ID No." column is being added to a group. Enter "D" if the existing emission unit, emission point, or process identified in the "ID No." column is being deleted from a group. If the revision item does not add or delete an emission unit, emission point, or process to or from a group, leave blank.

Group ID No.:

If applicable, enter the unique ID No. for the group (for purposes of completing the unit attribute and applicable requirement forms) in the appropriate format. If the revision item does not add or delete an emission unit, emission point or process to or from a group, leave blank.

Code Format Description

GRPXXXXXX Identification number of the group for which the unit is a member

(First three characters must be "GRP")

Table 3

Complete Table 3 only for Affected Sources that are subject to the following Program(s): Acid Rain, 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 facility (source) must be the same individual, if such a facility (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 facility 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 <u>EIA-860@eia.gov</u>. 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 <u>desantis.laurel@epa.gov</u>.

Specific:

Unit ID No.:

Each affected unit must be assigned an identification number (maximum 10 characters). The identification number listed on Table 3 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-SUMR and unit names from other sources such as EPA COR, EIA (ORIS), TCEQ SIP lists, etc. However, the Unit ID No. utilized for OP-SUMR, Table 3 must be consistent with those given on the OP-SUMR, Table 1.

Applicable Form:

Enter the number of the applicable UA form used on the first table of the OP-SUMR for the corresponding Unit ID No. If there is no applicable form listed on the first table of the OP-SUMR 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 existing Acid Rain and/or CAIR permits 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.) |
| | 1 |

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 |

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ALTMON A unit that is complying with EPA-approved alternative monitoring system requirements of

40 CFR Part 75, Subpart E for SO₂ and heat input.

REXM Applying for a retired unit exemption under 40 CFR Part 97, Subpart FFFFF (Texas SO₂ Trading

Program) (Applicant must also submit required additional information in a separate cover letter.)

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 for Revisions Form OP-SUMR Table 1

| Date | Permit No. | Regulated Entity No. | | |
|------|------------|----------------------|--|--|
| | | | | |

| Unit/Process AI | Unit/Process Revision No. | Unit/Process ID No. | Unit/Process Applicable Form | Unit/Process Name/ Description | Unit/Process CAM | Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106 | Preconstruction Authorizations Title I |
|--------------------|------------------------------|---------------------|------------------------------------|--------------------------------|---------------------|---|---|
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Texas Commission on Environmental Quality Federal Operating Permit Program Individual Unit Summary for Revisions Form OP-SUMR Table 2

| Date | Permit No. | Regulated Entity No. | | |
|------|------------|----------------------|--|--|
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| Revision No. | ID No. | Applicable Form | Group AI | Group ID No. |
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Texas Commission on Environmental Quality Federal Operating Permit Program Individual Unit Summary for Revisions Form OP-SUMR

Table 3: Acid Rain, Cross-State Air Pollution Rule (CSAPR), and Texas SO₂ Trading Program

| Date | Permit No. | Regulated Entity No. | | |
|------|------------|----------------------|--|--|
| | | | | |

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