

**Texas Commission on Environmental Quality**  
**Form OP-UA17**  
**Distillation Unit Attributes**

**General:**

This form is used to provide a description and data pertaining to all distillation units with potentially applicable requirements associated with a particular account number and application. Each table number, along with the possibility of a corresponding letter (i.e., Table 1a, Table 1b), corresponds to a certain state or federal rule. If the rule on the table is not potentially applicable to a distillation unit, then it should be left blank and need not be submitted with the application. If the codes entered by the applicant show negative applicability to the rule or sections of the rule represented on the table, then the applicant need not complete the remainder of the table(s) that corresponds to the rule. Further instruction as to which questions should be answered and which questions should not be answered are located in the “Specific” section of the instruction text. The following is included in this form:

**Table 1a - 1b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), Subpart NNN: Standards of Performance for Volatile Organic Compound (VOC) Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations**

The application area name from Form OP-1 entitled, “Site Information Summary” must appear in the header of each page for the purpose of identification for the initial submittal. The date of the initial form submittal must also be included and should be consistent throughout the application (MM/DD/YYYY). Leave the permit number blank for the initial form submittal. If this form is included as part of the permit revision process, enter the permit number assigned by the TCEQ, the area name (from Form OP-1), and the date of the revision submittal.

The Texas Commission on Environmental Quality (TCEQ) requires that a Core Data Form be submitted on all incoming registrations unless all of the following are met: the Regulated Entity and Customer Reference Numbers have been issued by the TCEQ and no core data information has changed. The Central Registry, a common record area of the TCEQ which maintains information about TCEQ customers and regulated activities, such as company names, addresses, and telephone numbers. This information is commonly referred as “core data.” The Central Registry provides the regulated community with a central access point within the agency to check core data and make changes when necessary. When core data about a facility is moved to the Central Registry, two new identification numbers are assigned: The Customer Reference (CN) number and the Regulated Entity (RN) number. The Core Data Form is required if facility records are not yet part of the Central Registry or if core data for a facility has changed. If this is the initial registration, permit, or license for a facility site, then the Core Data Form must be completed and submitted with application or registration forms. If amending, modifying, or otherwise updating an existing record for a facility site, the Core Data Form is not required, unless any core data information has changed. To review additional information regarding the Central Registry, go to the TCEQ website at [www.tceq.texas.gov/permitting/central\\_registry](http://www.tceq.texas.gov/permitting/central_registry).

Unit attribute questions that do not require a response from all applicants are preceded by qualification criteria in the instructions. If the unit does not meet the qualification criteria, a response to the question is not required. Anytime a response is not required based on the qualification criteria, leave the space on the form blank. Notwithstanding any qualification criteria in the form instructions or information provided in other TCEQ guidance, the applicant may leave an attribute question blank (or indicate “N/A” for “Not Applicable”) if the attribute is not needed for the applicable requirement determinations of a regulation for a unit.

In some situations, the applicant has the option of selecting alternate requirements, limitations, and/or practices for a unit. Note that these alternate requirements, limitations, and/or practices must have the required approval from the TCEQ Executive Director and/or the U.S. Environmental Protection Agency (EPA) Administrator before the federal operating permit application is submitted.

**Specific:**

**Table 1a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), Subpart NNN: Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Processing Distillation Operations**

**Unit ID No.:**

Enter the identification number (ID No.) for the distillation unit (maximum 10 characters) as listed on Form OP-SUM (Individual Unit Summary).

**SOP Index No.:**

Site operating permit (SOP) applicants should indicate the SOP index number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP index numbers, please go to the TCEQ website at [www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/additional\\_fop\\_guidance.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/additional_fop_guidance.pdf).

**Subpart NNN Chemicals:**

Enter "YES" if the distillation unit produces any chemical listed in 40 CFR § 60.667 as a product, co-product, by-product, or intermediate. Otherwise, enter "NO."

▼ Continue only if "Subpart NNN Chemicals" is "YES."

**Construction/Modification Date:**

Select one of the following options for date of commencement of the most recent construction, modification, or reconstruction. Enter the code on the form.

Code	Description
83-	On or before December 30, 1983
83+	After December 30, 1983

▼ Continue only if "Construction/Modification Date" is "83+."

**Vent Type:**

Select one of the following options for the vent type. Enter the code on the form.

Code	Description
NOVRS	Distillation unit not discharging vent stream into a vapor recovery system
VRS	A single distillation unit discharging vent stream into a vapor recovery system
2+VRS	Two or more distillation units discharging vent stream into a common vapor recovery system
NONE	None of the above

▼ Continue only if "Vent Type" is "NOVRS," "VRS," or "2+VRS."

**Distillation Unit Type:**

Select one of the following options for distillation unit type. Enter the code on the form.

Code	Description
CTBA	Distillation unit operating as a part of a process unit which produces coal tar or beverage alcohols
NOVOC	Distillation unit operating as a part of a process unit which does not use, contain, or produce VOC
60DDD	Distillation unit subject to 40 CFR Part 60, Subpart DDD
BATCH	Distillation unit that is designed and operated as a batch operation
NONE	None of the above

▼ **Continue only if “Distillation Unit Type” is “NONE.”**

**Total Design Capacity:**

Select one of the following options for the total design capacity for all of the chemicals produced within the unit.

Code	Description
1-	Less than 1 gigagram per year
1+	Greater than or equal to 1 gigagram per year

▼ **Do not continue only if “Total Design Capacity” is “1-.”**

**Vent Stream Flow Rate:**

Select one of the following options for the vent stream flow rate. Enter the code on the form.

Code	Description
8-	Flow rate less than 0.008 scm/min
8+	Flow rate greater than or equal to 0.008 scm/min

▼ **Do not continue only if “Vent Stream Flowrate” is “8-.”**

**Table 1b:** Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), Subpart NNN: Standards of Performance for Volatile Organic Compound (VOC) Emissions from Synthetic Organic Chemical Processing Distillation Operations

**Unit ID No.:**

Enter the identification number (ID No.) for the distillation unit (maximum 10 characters) as listed on Form OP-SUM (Individual Unit Summary).

**SOP Index No.:**

Site operating permit (SOP) applicants should indicate the SOP index number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP index numbers, please go to the TCEQ website at [www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/additional\\_fop\\_guidance.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/additional_fop_guidance.pdf).

**Total Resource Effectiveness:**

Select one of the following options for the total resource effectiveness (TRE) index value. Enter the code on the form.

Code	Description
8-A	TRE index value less than 8.0 from halogenated vent stream
8-B	TRE index value less than or equal to 8.0 not from halogenated vent stream
8+A	TRE index value greater than 8.0 from halogenated vent stream
8+B	TRE index value greater than 8.0 not from halogenated vent stream

*Note: TRE index is defined in 40 CFR § 60.661.*

▼ **Continue only if “Total Resource Effectiveness” is “8-A” or “8-B.”**

**TOC Reduction:**

Enter “YES” if compliance is achieved by reducing total organic compounds (TOC) emissions (less methane and ethane) by 98 weight-percent or to a TOC (less methane and ethane) concentration of 20 ppmv dry basis corrected to 3 percent oxygen using a VOC emissions control device. Otherwise, enter “NO.” Note: Flares complying with § 60.662(b) or Recovery Devices complying with § 60.662(c) **must** answer “NO.”

**Subpart NNN Control Device:**

Select one of the following options for the control or recovery device type as it pertains to 40 CFR Part 60, Subpart NNN. Enter the code on the form.

Code	Description
FLARE	Flare used to comply with 40 CFR § 60.662(b)

Control Devices used to comply with 40 CFR § 60.662(a)

Code	Description
THERIN	Thermal incinerator
CATINC	Catalytic incinerator
BPH44-	Boiler or process heater design heat input capacity less than 44 MW (150 MMBtu/hr)
BPH44+	Boiler or process heater design heat input capacity greater than or equal to 44 MW (150 MMBtu/hr)
ADALT-CD	EPA Administrator approved demonstration of compliance with 40 CFR § 60.662(a) other than 40 CFR § 60.663(a), (b), (c), or (d)

Recovery Devices used to comply with 40 CFR § 60.662(c)

Code	Description
CADS	Carbon adsorption system
ABSORB	Absorber
COND	Condenser
ADALT-RD	EPA Administrator approved demonstration of compliance with 40 CFR § 60.662(c) other than 40 CFR § 60.663(a), (b), (c), or (d)

**ACT ID No.:**

If “Control Device Type” is “ADALT,” enter the corresponding alternate control technology (ACT) unique identifier for each unit or process (maximum 10 characters). If the unique identifier is unavailable, then enter the date of the ACT approval letter. The unique identifier and/or the date of the approval letter is contained in the compliance file under the appropriate account number. Otherwise, leave this column blank.

**Subpart NNN Control Device ID No.:**

Enter the identification number (ID No.) for the control device to which emissions are routed (maximum 10 characters). This number should be consistent with the number listed on Form OP-SUM.

**Emission Point ID No(s).:**

Enter the identification number (ID No.) of the emission point(s) to which the unit routes emissions (maximum 10 characters). The number(s) should be consistent with the unit identification number listed on Form OP-SUM. If the unit is routing to two emissions points, use both columns. If the unit is routing to more than two emission points, use additional rows.

▼ **Complete “Organic Monitoring Device” only if “Subpart NNN Control Device” is “CADS,” “ABSORB,” or “COND.”**

**Organic Monitoring Device:**

Enter “YES” if an organic monitoring device is used to demonstrate compliance with the TRE index value limit specified under § 60.662(c). Otherwise, enter “NO.”

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**Distillation Unit Attributes**

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**Federal Operating Permit Program**

**Table 1a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**

**Subpart NNN: Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations**

<b>Date:</b>	
<b>Permit No.:</b>	
<b>Regulated Entity No.:</b>	

<b>Unit ID No.</b>	<b>SOP Index No.</b>	<b>Subpart NNN Chemicals</b>	<b>Construction/Modification Date</b>	<b>Vent Type</b>	<b>Distillation Unit Type</b>	<b>Total Design Capacity</b>	<b>Vent Stream Flow Rate</b>

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**Federal Operating Permit Program**

**Table 1b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**

**Subpart NNN: Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations**

<b>Date:</b>	
<b>Permit No.:</b>	
<b>Regulated Entity No.:</b>	

Unit ID No.	SOP Index No.	Total Resource Effectiveness	TOC Reduction	Subpart NNN Control Device	ACT ID No.	Subpart NNN Control Device ID No.	Emission Point ID No(s).	Organic Monitoring Device