

INSTRUCTIONS
Texas Natural Resource Conservation Commission
Form OP-UA56
Vinyl Chloride Process Attributes

General:

This form is used to provide a description and data pertaining to all vinyl chloride processes 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 vinyl chloride process, 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:

Tables 1a - 1c: Title 40 Code of Federal Regulations Part 61 (40 CFR Part 61)
Subpart F: National Emission Standard for Vinyl Chloride

The Texas Commission on Environmental Quality (TCEQ) primary account number (XX-XXXX-X) and the application area name from Form OP-1 (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), the date of the revision submittal, and the account number.

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 (FOP) application is submitted.

Specific:

Table 1a: Title 40 Code of Federal Regulations Part 61 (40 CFR Part 61)
Subpart F: National Emission Standard for Vinyl Chloride

PROCESS ID NO.: Enter the identification number (ID No.) for the vinyl chloride process (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 refer to the TCEQ guidance document entitled “Federal Operating Permit Application Guidance Document.”

PRODUCT PRODUCED: Select one of the following options that describes the type of material produced. Enter the code on the form.

| <u>Code</u> | <u>Description</u> |
|-------------|---|
| EDC | Ethylene dichloride by reaction of oxygen and hydrogen chloride with ethylene |
| VINYL | Vinyl chloride by any process |
| POLY | One or more polymers containing any fraction of polymerized vinyl chloride |

EEP: Enter “YES” if the EPA Administrator has approved equivalent equipment or procedures (EEP). Otherwise, enter “NO”.

EEP ID NO.: If an EEP has been approved, then enter the corresponding EEP unique identifier for each unit or process. If the unique identifier is unavailable, then enter the date of the EEP approval letter. The unique identifier and/or the date of the approval letter are contained in the Compliance File under the appropriate account number. Otherwise, leave this column blank.

– Continue only if “EEP” is “NO”.

i Complete “Oxychlorination Reactor” and “Ethylene Dichloride Purification” only if “Product Produced” is “EDC”.

OXYCHLORINATION REACTOR: Enter “YES” if the process contains an oxychlorination reactor. Otherwise, enter “NO”.

ETHYLENEDICHLORIDE PURIFICATION: Enter “YES” if the process contains equipment used in ethylene dichloride purification. Otherwise, enter “NO”.

i Complete “Research and Development” only if “Product Produced” is “POLY”.

RESEARCH AND DEVELOPMENT: Enter “YES” if the process is used in research and development. Otherwise, enter “NO”.

i Complete “Reactor Capacity” only if “Research and Development” is “YES”.

REACTOR CAPACITY: Select one of the following options that describes the capacity of the reactor. Enter the code on the form.

| <u>Code</u> | <u>Description</u> |
|-------------|--|
| 19- | The reactor used to polymerize the vinyl chloride processed in the equipment has a capacity less than or equal to 0.19 m ³ (50 gallons) |
| 19-417 | The reactor used to polymerize the vinyl chloride processed in the equipment has a capacity greater than 0.19 m ³ (50 gallons) but less than or equal to 4.17 m ³ (1100 gallons) |
| 417+ | The reactor used to polymerize the vinyl chloride processed in the equipment has a capacity greater than 4.17 m ³ (1100 gallons) |

i Do not continue if “Reactor Capacity” is “19-”.

**Table 1b: Title 40 Code of Federal Regulations Part 61 (40 CFR Part 61)
Subpart F: National Emission Standard for Vinyl Chloride**

PROCESS ID NO.: Enter the identification number (ID No.) for the vinyl chloride process (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 refer to the TCEQ guidance document entitled “Federal Operating Permit Application Guidance Document.”

EXISTING SOURCE: Enter “YES” if the source is an existing source. Otherwise, enter “NO”.

i Complete “Initial Startup” only if “Existing Source” is “NO”.

INITIAL STARTUP: Enter “YES” if the initial startup date of the new source preceded the effective date. Otherwise, enter “NO”.

REACTOR: Enter “YES” if the process includes a reactor. Otherwise, enter “NO”.

STRIPPER: Enter “YES” if the process includes a stripper. Otherwise, enter “NO”.

MONOMER RECOVERY SYSTEM: Enter “YES” if the process includes a monomer recovery system. Otherwise, enter “NO”.

PRECEDING STRIPPER: Enter “YES” if mixing, weighing, or holding containers precede a stripper (or reactor if the process has no stripper). Otherwise, enter “NO”.

– Continue only if “Research and Development” is “NO” or if “Reactor Capacity” is “417+”.

**Table 1c: Title 40 Code of Federal Regulations Part 61 (40 CFR Part 61)
Subpart F: National Emission Standard for Vinyl Chloride**

PROCESS ID NO.: Enter the identification number (ID No.) for the vinyl chloride process (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 refer to the TCEQ guidance document entitled “Federal Operating Permit Application Guidance Document.”

BULK RESIN REACTOR: Enter “YES” if the process includes a bulk resin reactor or a nonbulk resin reactor not used as a stripper. Otherwise, enter “NO”.

NONBULK RESIN REACTOR: Enter “YES if the process includes a nonbulk resin reactor used as a stripper. Otherwise, enter “NO”.

i Complete “Complying with § 60.64(f)” only if “Nonbulk Resin Reactor” is “YES”.

COMPLYING WITH § 61.64(f): Enter “YES” if the owner or operator chooses to comply with 40 CFR § 61.64(f) in lieu of 40 CFR § 61.64(a)(2) and 40 CFR § 61.64(e)(1). Otherwise, enter “NO”.

STRIPPING OPERATION TO ATTAIN § 61.64(e): Enter “YES” if a stripping operation is used to attain the emission level prescribed in 40 CFR § 61.64(e). Otherwise, enter “NO”.

BATCH STRIPPING: Enter “YES” if batch stripping is used. Otherwise, enter “NO”.

TECHNOLOGY: Enter “YES” if technology other than, or in addition to, a stripping operation is used to control vinyl chloride emissions. Otherwise, enter “NO”.

