

# Statement of Basis of the Federal Operating Permit

LCY Elastomers LP

Site/Area Name: LCY Elastomers LP  
Physical location: 4803 Decker Drive  
Nearest City: Baytown  
County: Harris

Permit Number: O1756  
Project Type: Minor Revision

Standard Industrial Classification (SIC) Code: 2822  
SIC Name: Synthetic Rubber (Vulcanizable Elastomers)

This Statement of Basis sets forth the legal and factual basis for the draft changes to the permit conditions resulting from the minor revision project in accordance with 30 TAC §122.201(a)(4). The applicant has submitted an application for a minor permit revision per §§ 122.215-217. This document may include the following information:

- A description of the facility/area process description;
- A description of the revision project;
- 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: June 3, 2014

## **Operating Permit Basis of Determination**

### **Description of Revisions**

Special Terms & Conditions have been updated. Many vents have been grouped into GRP-VENTS<sub>1</sub> & GRP-VENTS<sub>2</sub> with applicability under 30 TAC Chapter 111 (Visible Emissions) being added. Existing applicability under 30 TAC Chapter 115 (Vent Gas Control) has been updated for many units. Existing applicability under 30 TAC Chapter 115 (HRVOC Vent Gas) has been updated for many units. Existing applicability under 30 TAC Chapter 115 (HRVOC Fugitive Emissions) has been updated for unit FE-1. Existing applicability under 30 TAC Chapter 115 (HRVOC Cooling Towers) has been updated for unit H-7624. Existing applicability under 30 TAC Chapter 115 (Loading and Unloading of VOC) has been updated for unit LOADING. Existing applicability under 30 TAC Chapter 115 (Degreasing Processes) has been updated for unit DEGREASER. Existing applicability under 30 TAC Chapter 115 (Storage of VOCs) has been updated for many units. Existing applicability under 30 TAC Chapter 117, Subchapter B has been updated for several units. Applicability under 40 CFR 63 Subpart ZZZZ has been added to several engines. Periodic Monitoring has been added to GRP-DECANTERS. Turbine VE-11 has had additional Periodic Monitoring added to already existing monitoring. Deviation limits for all Periodic Monitoring/Compliance Assurance Monitoring have been updated and/or corrected. NSR Authorizations have been reviewed and updated.

### **Permit Area Process Description**

LCY Elastomers produces two types of thermoplastic elastomers (TPE): Styrene-butadiene-styrene (SBS) and styrene-isoprene-styrene (SIS). A TPE is a rubbery plastic or a plastic rubber that exhibits the best properties of both families of polymers, but unlike natural rubber, does not require vulcanization to achieve physical strength. The main product applications are adhesives, roofing material, asphalt modification, and highly specialized molded and extruded products. Each of the component chemicals are listed in NSPS NNN, §60.667 list of affected chemicals, however the facility uses these as raw materials, which are stored off-site on property owned and operated by Texas Petrochemicals Corporation (TPC).

#### Physical plant

Steam is generated on-site in two natural gas-fired boilers and a heat recovery steam generator (HSRG). Process wastewater effluents go through preliminary treatment before being pumped to the local publicly owned treatment works (POTW). Non-process stormwater is collected in a pond and pumped into the city storm sewer system. Electricity is generated on-site using a Solar Taurus combustion turbine generating approximately 4.6 MW (1.3 MM Btu/hr) of electrical power. Backup power is produced by a natural gas fired generator and Houston Lighting & Power (HL&P). Two diesel-driven fire pumps supply power for the fire protection system.

#### Raw Materials

The co-monomers, styrene, butadiene, and isoprene are purified by removing water which is a contaminant to the process. Other raw materials are the reaction solvent, coupling agents, activators, initiators, surfactants, antioxidants, extenders, and release agents. The initiators are pyrophoric and react violently with water. Emissions from the initiators are vented through a seal pot to the atmosphere.

#### Reactor

In the initial reaction step, solvent, activator, and initiator are pumped into the reactor. Batch-wise addition of the co-monomers is the next reaction step. The concentrated initiator causes the co-monomers to polymerize very quickly. The final step in the reactor process is the addition of small amounts of coupling agent to partially cross-link the polymer chains.

#### Blending

When the desired molecular weight has been achieved, the polymer solution flows to the blend tanks. Each blend tank has the capacity to hold 8 reactor batches. Blending batches together enhances product uniformity

and provides a surge interface between the reactors, which operate in batch mode, and the steam stripper, which operates in continuous mode.

#### Steam Stripping

Countercurrent steam strippers remove the solvent from the polymer solution leaving an aqueous solution of polymer crumb (TPE). Any residual initiator reacts with an overwhelming volume of water. At this point the slurry is essentially free of volatile organic materials, except for solvent in the hot water. The stripper overheads, consisting of stripped solvent and steam, are condensed and decanted to recover solvent. The decanted water receives a final steam stripping to remove any recoverable solvent before being biotreated. The wet solvent is recycled back to the solvent drying column for re-use.

#### Finishing

In the finishing step a variety of mechanical and thermal devices dewater and dry the polymer crumb. These devices include shaker screens, settling tanks, dryer/expellers, heaters, and dryers. The heat for thermal sources is provided by steam sources. The dried polymer crumb is then milled, cooled, and packaged for shipment in bags or bulk containers. The product is shipped by truck or rail to end users.

#### **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	NOx
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#### **Reading State of Texas’ 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**

All stationary vents subject to 30 TAC Chapter 111 are listed in the permit's Applicable Requirement Summary. The basis for the applicability determinations for these vents is 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

### Basis for Applying Permit Shields

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

### 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](http://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](http://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*	Changes and Exceptions to DSS**
EMERGEN	30 TAC Chapter 117, Subchapter B	R117-1	Horsepower Rating = GOP 150+ hp Type of Service = Used exclusively in emergency situations [claiming the emergency service exemption under 30 TAC §§ 117.103(a)(6)(D), 117.203(a)(6)(D), 117.303(a)(6)(D) or 117.403(a)(7)(D)] Fuel Fired = Natural gas	
EMERGEN	40 CFR Part 60, Subpart JJJJ	60JJJJ-1	Construction/Reconstruction/Modification Date = The stationary spark ignition (SI) internal combustion engine (ICE) commenced construction, reconstruction or modification prior to June 12, 2006.	
EMERGEN	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-1	Brake HP = Stationary RICE with a brake hp less than 100 hp. Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002. Nonindustrial Emergency Engine = Stationary RICE is not defined as a residential emergency RICE, a commercial emergency RICE, or an institutional emergency RICE. Service Type = Emergency use. Stationary RICE Type = 4 stroke spark ignited lean burn engine.	The citations for this rule were determined from the basis of determination provided (i.e. the unit attributes that the applicant should provide when no form exists) and an analysis of the rule text.
P-7632A	30 TAC Chapter 117, Subchapter B	R117-1	Horsepower Rating = GOP 150+ hp Type of Service = Used exclusively in emergency situations [claiming the emergency service exemption under 30 TAC §§ 117.103(a)(6)(D), 117.203(a)(6)(D), 117.303(a)(6)(D) or 117.403(a)(7)(D)] Fuel Fired = Petroleum-based diesel fuel	
P-7632A	40 CFR Part 60, Subpart IIII	60IIII-1	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification on or before July 11, 2005.	
P-7632A	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-1	Brake HP = Stationary RICE with a brake hp greater than or equal to 100 and less than 250 hp. Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002. Nonindustrial Emergency Engine = Stationary RICE is not defined as a residential emergency RICE, a commercial emergency RICE, or an institutional emergency RICE. Service Type = Emergency use. Stationary RICE Type = Compression ignition engine	The citations for this rule were determined from the basis of determination provided (i.e. the unit attributes that the applicant should provide when no form exists) and an analysis of the rule text.
P-7632B	30 TAC Chapter 117, Subchapter B	R117-1	Horsepower Rating = GOP 150+ hp Type of Service = Used exclusively in emergency situations [claiming the emergency service exemption under 30 TAC §§ 117.103(a)(6)(D), 117.203(a)(6)(D), 117.303(a)(6)(D) or 117.403(a)(7)(D)] Fuel Fired = Petroleum-based diesel fuel	
P-7632B	40 CFR Part 60, Subpart IIII	60IIII-1	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification on or before July 11, 2005.	
P-7632B	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-1	Brake HP = Stationary RICE with a brake hp greater than or equal to 100 and less than 250 hp. Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002. Nonindustrial Emergency Engine = Stationary RICE is not defined as a residential emergency RICE, a commercial emergency RICE, or an institutional emergency RICE. Service Type = Emergency use. Stationary RICE Type = Compression ignition engine	The citations for this rule were determined from the basis of determination provided (i.e. the unit attributes that the applicant should provide when no form exists) and an analysis of the rule text.

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
TK-7210	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>	
TK-7210	40 CFR Part 60, Subpart Kb	60Kb-1	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 19,800 gallons (75,000 liters) but less than 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is less than 2.2 psia</p>	
V-7103	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>	
V-7103	40 CFR Part 60, Subpart Kb	60Kb-1	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is less than 2.2 psia</p>	
V-7141	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = Other than crude oil, condensate, or VOC</p>	
V-7141	40 CFR Part 60, Subpart Kb	60Kb-1	<p>Product Stored = Stored product other than volatile organic liquid or petroleum liquid</p>	
V-7621	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>	

<b>Unit ID</b>	<b>Regulation</b>	<b>Index Number</b>	<b>Basis of Determination*</b>	<b>Changes and Exceptions to DSS**</b>
V-7621	40 CFR Part 60, Subpart Kb	60Kb-1	Product Stored = Volatile organic liquid Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)	
V-7701	30 TAC Chapter 115, Storage of VOCs	R115-1	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = Other than crude oil, condensate, or VOC	
V-7701	40 CFR Part 60, Subpart Kb	60Kb-1	Product Stored = Stored product other than volatile organic liquid or petroleum liquid	
V-7702	30 TAC Chapter 115, Storage of VOCs	R115-1	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons	
V-7702	40 CFR Part 60, Subpart Kb	60Kb-1	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 2.2 psia	
V-7831	30 TAC Chapter 115, Storage of VOCs	R115-1	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons Control Device Type = Other vapor destruction unit	
V-7831	30 TAC Chapter 115, Storage of VOCs	R115-2	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons Control Device Type = Flare	
V-7831	40 CFR Part 60, Subpart Kb	60Kb-1	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			(75,000 liters) Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 2.2 psia but less than 4.0 psia	
V-7832	30 TAC Chapter 115, Storage of VOCs	R115-1	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons Control Device Type = Other vapor destruction unit	
V-7832	30 TAC Chapter 115, Storage of VOCs	R115-2	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons Control Device Type = Flare	
V-7832	40 CFR Part 60, Subpart Kb	60Kb-1	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters) Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 4.0 psia but less than 11.1 psia	
LOADING	30 TAC Chapter 115, Loading and Unloading of VOC	R115-1	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline. Transfer Type = Loading and unloading. True Vapor Pressure = True vapor pressure greater than or equal to 0.5 psia. Daily Throughput = Loading less than 20,000 gallons per day.	
GRPBOIL AB	30 TAC Chapter 117, Subchapter B	R117-1	NOX EMISSION LIMITATION = Title 30 TAC § 117.310(d)(3) [relating to mass emissions cap and trade in 30 TAC Chapter 101, Subchapter H, Division 3 and Emission Specifications for Attainment Demonstration]. UNIT TYPE = Other industrial, commercial, or institutional boiler. MAXIMUM RATED CAPACITY = MRC is greater than or equal to 40 MMBtu/hr but less than 100 MMBtu/hr. NOX MONITORING SYSTEM = Maximum emission rate testing. FUEL FLOW MONITORING = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.140(a), 117.340(a) or 117.440(a). CO EMISSION LIMITATION = Title 30 TAC § 117.310(c)(1) 400 ppmv option.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>CO MONITORING SYSTEM = Monitored by method other than CEMS or PEMS.</p> <p>EGF SYSTEM CAP UNIT = The unit is not used as an electric generating facility to generate electricity for sale to the electric grid.</p> <p>INSTITUTIONAL, COMMERCIAL, INDUSTRIAL SOURCES FUEL TYPE #1 [REG VII] = Gaseous fuel other than natural gas landfill gas or renewable non-fossil fuel gases.</p> <p>NOX EMISSION LIMIT AVERAGE = Emission limit in pounds/hour on a block one-hour average.</p> <p>NOX REDUCTIONS = No NO<sub>x</sub> reduction.</p> <p>ANNUAL HEAT INPUT/INSTITUTIONAL, COMMERCIAL, INDUSTRIAL SOURCES [REG VII] = Annual heat input is greater than 2.8(10<sup>11</sup>) Btu/yr, based on rolling 12-month average.</p>	
GRPBOIL AB	40 CFR Part 60, Subpart Dc	60Dc-1	<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>SO<sub>2</sub> INLET MONITORING TYPE = No SO<sub>2</sub> 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>SO<sub>2</sub> OUTLET MONITORING TYPE = No SO<sub>2</sub> monitoring.</p> <p>HEAT INPUT CAPACITY = Heat input capacity is greater than or equal to 30 MMBtu/hr (8.7 MW) but less than or equal to 75 MMBtu/hr (22 MW).</p> <p>TECHNOLOGY TYPE = Other conventional technology.</p> <p>D-SERIES FUEL TYPE = Natural gas.</p> <p>ACF OPTION - SO<sub>2</sub> = Other ACF or no ACF.</p> <p>ACF OPTION - PM = Other ACF or no ACF.</p> <p>30% COAL DUCT BURNER = The facility does not combust coal in a duct burner as part of a combined cycle system; or more than 30% of the heat is from combustion of coal and less than 70% is from exhaust gases entering the duct burner.</p>	<p><b>(SO<sub>2</sub>, PM, and Opacity Requirements)</b></p> <p>Recordkeeping citations §60.48c(g)(2)-(3) have been removed. Applicant is only complying with §60.48c(g)(1).</p> <p>Reporting citation [G]§60.48c(a) has been removed and ungrouped. Since §60.48c(a)(2) references annual capacity factors, and does not apply, only §60.48c(a), (a)(1), and (a)(3) have been added.</p>
H-7901	30 TAC Chapter 111, Visible Emissions	R111-1	<p>ACID GASES ONLY [REG I] = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1.</p> <p>EMERGENCY/UPSET CONDITIONS ONLY [REG I] = Flare is used under conditions other than emergency or upset conditions.</p>	
H-7901	30 TAC Chapter 115, HRVOC Vent Gas	R115-1	<p>MONITORING REQUIREMENTS = Flare is complying with the continuous monitoring requirements of § 115.725(d).</p> <p>OUT OF SERVICE = Flare was not permanently out of service by April 1, 2006.</p> <p>TOTAL GAS STREAM = Flare receives a total gas stream with greater than 100 ppmv HRVOC at some time.</p> <p>GAS STREAM CONCENTRATION = Flare receives a gas stream containing 5% or greater HRVOC by weight at some time.</p> <p>ALTERNATIVE MONITORING = No alternative monitoring and test methods are used.</p> <p>MINOR MODIFICATION = No minor modifications to the monitoring and test methods are used.</p> <p>TANK SERVICE = Flare is not in dedicated service for storage tanks with 95% or greater of an individual HRVOC.</p> <p>FLARE TYPE = Flare is in multi-purpose service.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
H-7902	30 TAC Chapter 111, Visible Emissions	R111-1	ACID GASES ONLY [REG I] = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. EMERGENCY/UPSET CONDITIONS ONLY [REG I] = Flare is used under conditions other than emergency or upset conditions.	
H-7902	30 TAC Chapter 115, HRVOC Vent Gas	R115-1	MONITORING REQUIREMENTS = Flare is complying with the continuous monitoring requirements of § 115.725(d). OUT OF SERVICE = Flare was not permanently out of service by April 1, 2006. TOTAL GAS STREAM = Flare receives a total gas stream with greater than 100 ppmv HRVOC at some time. GAS STREAM CONCENTRATION = Flare receives a gas stream containing 5% or greater HRVOC by weight at some time. ALTERNATIVE MONITORING = No alternative monitoring and test methods are used. MINOR MODIFICATION = No minor modifications to the monitoring and test methods are used. TANK SERVICE = Flare is not in dedicated service for storage tanks with 95% or greater of an individual HRVOC. FLARE TYPE = Flare is in multi-purpose service.	
VE-11	30 TAC Chapter 117, Subchapter B	R117-1	FUEL FLOW MONITORING = Fuel flow is with a totalizing fuel flow meter per 30 TAC §§ 117.140(a), 117.340(a) or 117.440(a). MEGAWATT RATING = MR is greater than or equal to 1 MW and less than 10 MW and unit is not an opt-in unit. CO EMISSION LIMITATION = Title 30 TAC § 117.310(c)(1). EGF SYSTEM CAP UNIT = The engine is not used as an electric generating facility to generate electricity for sale to the electric grid. AVERAGING METHOD = Complying with the applicable emission limits using a block one-hour average. CO MONITORING SYSTEM = Monitoring other than CEMS, PEMS or steam/fuel or water/fuel ratio monitoring. NOX REDUCTIONS/INSTITUTIONAL, COMMERCIAL, INDUSTRIAL SOURCES [REG VII] = No NO <sub>x</sub> reduction. SERVICE TYPE/INSTITUTIONAL, COMMERCIAL, INDUSTRIAL SOURCES [REG VII] = Stationary gas turbine. NOX EMISSION LIMITATION = Title 30 TAC §§ 117.310(d)(3) and 117.310(a)(10) or 117.310(a)(11). NOX MONITORING SYSTEM = Maximum emission rate testing. 23C-OPTION = Rate measured by hourly emission rate testing per § 117.123(c)(1)(C) or § 117.423(c)(1)(C).	
VE-11	40 CFR Part 60, Subpart GG	60GG-1	DUCT BURNER = The turbine is part of a combined cycle turbine system not equipped with supplemental heat (duct burner). NITROGEN OXIDES (NOX) CONTROL METHOD [NSPS GG] = No NO <sub>x</sub> control method is used. PEAK LOAD HEAT INPUT [NSPS GG] = Heat Input is greater or equal to 10 MMBtu/hr (10.7 GJ/hr) and less than or equal to 100 MMBtu/hr (107.2 GJ/hr). CONSTRUCTION/MODIFICATION DATE [NSPS GG] = On or after October 3, 1982 and before July 8, 2004. NOX ALLOWANCE = The owner or operator is not electing to use a NO <sub>x</sub> allowance in determining emission limits in 40 CFR § 60.332(a). NOX MONITORING METHOD = No continuous monitoring system is used. SULFUR CONTENT [NSPS GG] = Compliance is demonstrated by determining the sulfur content of the fuel. TURBINE CYCLE = Unit recovers heat from the gas turbine exhaust to heat water or generate steam. 40 CFR 60 (NSPS) SUBPART GG SERVICE TYPE = Type of service other than research and development, emergency, military or electrical utility generation.	<b>(SO<sub>2</sub> Requirements only)</b> Monitoring/Testing citation [G]§60.334(h)(3) has been removed and ungrouped. Since §60.334(h)(3)(ii) references representative fuel sampling, and does not apply, only §60.334(h)(3) and (h)(3)(i) have been added.

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>FUEL TYPE FIRED = Natural gas meeting the definition in § 60.331(u).</p> <p>FUEL SUPPLY [NSPS GG] = Stationary gas turbine is supplied its fuel without intermediate bulk storage.</p> <p>FUEL MONITORING SCHEDULE = Fuel meets the definition of natural gas in 40 CFR § 60.331(u) and is not monitored.</p>	
FE-1	30 TAC Chapter 115, HRVOC Fugitive Emissions	R115-1	<p>Agitators = The fugitive unit contains agitators.</p> <p>Alternative Work Practice in § 115.358 = No components are complying with the alternative work practice requirements in 30 TAC § 115.358.</p> <p>Compressor Seals = The fugitive unit does not contain compressor seals.</p> <p>Open-ended Valves or Lines = The fugitive unit contains open-ended valves or lines.</p> <p>Process Drains = The fugitive unit contains process drains.</p> <p>Title 30 TAC §115.780 Applicable = The fugitive unit contains a defined process and Highly Reactive VOC.</p> <p>Valves (not pressure relief, open-ended or bypass line valves) = The fugitive unit contains valves other than pressure relief, open-ended or bypass line valves.</p> <p>ACR = No agitators are complying with an alternate control requirement.</p> <p>Less Than 250 Components at Site = The fugitive unit is located at a site with at least 250 fugitive components in VOC service.</p> <p>Weight Percent HRVOC = Components in the fugitive unit contact process fluids that contain less than 5.0% HRVOC by weight and process fluids that contain HRVOC at 5.0%, or greater, by weight on an annual average basis.</p> <p>Complying with § 115.781(b)(9) = No process drains are complying with the requirements of § 115.781(b)(9).</p> <p>Complying with § 115.781(b)(9) = Agitators are complying with the requirements of § 115.781(b)(9).</p> <p>Pumps with Shaft Seal System = Pumps are equipped with a shaft sealing system that prevents or detects emission of VOC from the seal.</p> <p>Bypass Line Valves = The fugitive unit does not contain bypass line valves.</p> <p>Compressors with Shaft Seal System = Compressors are equipped with a shaft sealing system that prevents or detects emission of VOC from the seal.</p> <p>Flanges or Other Connectors = The fugitive unit contains flanges or other connectors.</p> <p>Heat Exchanger Heads, etc. = The fugitive unit contains heat exchanger heads, sight glasses, meters, gauges, sampling connections, bolter manways, hatches, sump covers, junction vent boxes or covers and seals on VOC water separators.</p> <p>Pressure Relief Valves = The fugitive unit contains pressure relief valves.</p> <p>Pump Seals = The fugitive unit contains pump seals.</p> <p>ACR = No heat exchanger heads, sight glasses, meters, gauges, sampling connections, bolted manways, hatches, sump covers, junction box vents, or covers and seals on VOC water separators are complying with an alternate control requirement.</p> <p>Agitators with Shaft Seal System = Agitators are equipped with a shaft sealing system that prevents or detects emission of VOC from the seal.</p> <p>Complying with § 115.781(b)(9) = Heat exchanger heads, sight glasses, meters, gauges, sampling connections, bolted manways, hatches, sump covers, junction box vents, or covers and seals on VOC water separators are complying with the requirements of § 115.781(b)(9).</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
H-7624	30 TAC Chapter 115, HRVOC Cooling Towers	R115-1	<p>COOLING TOWER HEAT EXCHANGE SYSTEM EXEMPTIONS = The cooling tower heat exchange system does not qualify for an exemption.</p> <p>JACKETED REACTOR = The cooling tower heat exchange system is not in dedicated service to a jacketed reactor.</p> <p>ALTERNATIVE MONITORING = Complying with the specified monitoring in 30 TAC § 115.764.</p> <p>DESIGN CAPACITY = Design capacity to circulate 8000 gpm or greater.</p> <p>FINITE VOLUME SYSTEM = The cooling tower heat exchange system is complying with the requirements in § 115.764(a).</p> <p>MODIFIED MONITORING = NOT USING MINOR MODIFICATIONS TO THE MONITORING AND TESTING METHODS IN 30 TAC § 115.764.</p> <p>FLOW MONITORING/TESTING METHOD = Choosing to monitor cooling water flow rate at a location representative of the total flow rate to the cooling tower in accordance with § 115.764(g)(2).</p> <p>TOTAL STRIPPABLE VOC = The cooling tower heat exchange system is complying with the requirements of § 115.764(a).</p> <p>ON-LINE MONITOR = A continuous on-line monitor capable of providing total HRVOC and speciated HRVOCs in ppbw is being used.</p>	
GRP-DECANTERS	30 TAC Chapter 115, Water Separation	R115-1	<p>ALTERNATE CONTROL REQUIREMENT (ACR) [REG V] = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910.</p> <p>EXEMPTION FROM CONTROL REQUIREMENTS OF 115.132 [REG V] = Water separator does not qualify for exemption.</p> <p>EMISSION CONTROL OPTION [REG V] = Vapor recovery system which satisfies the provisions of 30 TAC § 115.131.</p> <p>CONTROL DEVICE [REG V] = Control device or vapor recovery system other than a chiller, carbon adsorber, or incinerator.</p>	
GRP-VENTS1	30 TAC Chapter 111, Visible Emissions	R111-1	<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 from colorless VOCs, non-fuming liquids, or other sources that are not capable of producing visible emissions. Periodic monitoring to demonstrate compliance is not required.</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>	
GRP-VENTS1	30 TAC Chapter 115, Vent Gas Controls	R115-1	<p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
GRP-VENTS2	30 TAC Chapter 111, Visible Emissions	R111-1	<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>	
GRP-VENTS2	30 TAC Chapter 115, Vent Gas Controls	R115-1	<p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>	
PRO-POLY	30 TAC Chapter 115, HRVOC Vent Gas	R115-HR1	<p>HRVOC Concentration = The vent gas stream has a HRVOC concentration of at least 100 ppmv at some times.</p> <p>Max Flow Rate = The vent gas stream has a maximum potential flow rate greater than 100 dry standard cubic feet per hour (ft<sup>3</sup>/hr).</p> <p>Vent Gas Stream Control = Vent gas stream is controlled by a flare.</p>	
PRO-POLY	30 TAC Chapter 115, HRVOC Vent Gas	R115-HR2	<p>Alternative Monitoring = Not using alternative monitoring and testing methods.</p> <p>HRVOC Concentration = The vent gas stream has a HRVOC concentration of at least 100 ppmv at some times.</p> <p>Max Flow Rate = The vent gas stream has a maximum potential flow rate greater than 100 dry standard cubic feet per hour (ft<sup>3</sup>/hr).</p> <p>Minor Modification = Not using any minor modification to the monitoring and testing methods of the rule.</p> <p>Vent Gas Stream Control = Vent gas stream is controlled by a control device other than a flare.</p> <p>Process Knowledge = Testing using the specified appropriate reference methods and procedures are used to determine HRVOC emissions during emission events and scheduled startup, shutdown, and maintenance activities.</p> <p>Waived Testing = The executive director has not waived testing for identical vents.</p> <p>Testing Requirements = Process knowledge to determine maximum potential HRVOC hourly emissions for analyzer vents, stream system vents, vent gas streams with no HRVOC except during emission event or degassing safety device in lieu of testing.</p>	
PRO-POLY	30 TAC Chapter 115, Vent Gas Controls	R115-1	<p>Alternate Control Requirement = Alternate control is not used.</p> <p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115,</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Subchapter B, Division 2.</p> <p>Control Device Type = Smokeless flare</p> <p>Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.</p>	
PRO-POLY	30 TAC Chapter 115, Vent Gas Controls	R115-2	<p>Alternate Control Requirement = Alternate control is not used.</p> <p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Control Device Type = Boiler in which the vent gas stream is burned at a temperature of at least 1300° F (704 C).</p> <p>Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.</p>	
VE-11 STACK	30 TAC Chapter 111, Visible Emissions	R111-1	<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>	
VE-4	30 TAC Chapter 111, Visible Emissions	R111-1	<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>	
VE-5	30 TAC Chapter 111, Visible Emissions	R111-1	<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>	
VE-8	30 TAC Chapter 111, Visible Emissions	R111-1	<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</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>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 at least 100,000 actual cubic feet per minute.</p>	
DEGREASER	30 TAC Chapter 115, Degreasing Processes	R115-1	<p>30 TAC CHAPTER 115 (REG V) SOLVENT DEGREASING MACHINE TYPE = COLD SOLVENT CLEANING MACHINE</p> <p>ALTERNATE CONTROL REQUIREMENT (ACR) [REG V] = EXECUTIVE DIRECTOR HAS NOT APPROVED AN ALTERNATE CONTROL REQUIREMENT AS ALLOWED UNDER 30 TAC 115.413.</p> <p>SOLVENT SPRAYED [REG V] = SOLVENT IS SPRAYED</p> <p>SOLVENT VAPOR PRESSURE [REG V] = LESS THAN OR EQUAL TO 0.6 PSIA AS MEASURED AT 100 DEGREES FAHRENHEIT [SOLVENT DEGREASING MACHINE TYPE = 'COLD' OR 'RRC-S']</p> <p>SOLVENT HEATED = SOLVENT NOT HEATED TO A TEMPERATURE GREATER THAN 120 DEGREES FAHRENHEIT</p> <p>PARTS LARGER THAN DRAINAGE [REG V] = SOME CLEANED PART FOR WHICH MACHINE IS AUTHORIZED IS NOT LARGER THAN INTERNAL DRAINAGE FACILITY OF MACHINE.</p> <p>DRAINAGE AREA [REG V] = AREA GREATER THAN OR EQUAL TO 16 SQUARE INCHES</p> <p>DISPOSAL IN ENCLOSED CONTAINERS [REG V] = WASTE SOLVENT PROPERLY DISPOSED OF IN ENCLOSED CONTAINERS</p>	<p>Related Standards §115.417(2) and §115.417(2)(A) have been manually added to correctly identify additional exemptions.</p>
PRO-PAINT	30 TAC Chapter 115, Surface Coating Operations	R115-1	<p>ALTERNATE COMPLIANCE METHOD [REG V] = ALTERNATE METHOD FOR DEMONSTRATING AND DOCUMENTING CONTINUOUS COMPLIANCE WITH APPLICABLE CONTROL REQUIREMENTS OR EXEMPTION CRITERIA HAS NOT BEEN APPROVED</p> <p>ALTERNATE REQUIREMENTS [REG V] = ALTERNATE REQUIREMENT TO 30 TAC 115.421(A)(9) OR 115.421(B)(8) HAS NOT BEEN APPROVED BY TCEQ EXECUTIVE DIRECTOR</p> <p>30 TAC CHAPTER 115 (REG V) FACILITY OPERATIONS = OTHER METAL PARTS AND PRODUCTS COATING</p> <p>MISCELLANEOUS COATING TYPE [REG V] = EXTREME PERFORMANCE COATING, INCLUDING CHEMICAL MILLING MASKS</p> <p>VOC EMISSION RATE [REG V] = OTHER UNCONTROLLED EMISSION RATES</p> <p>VAPOR RECOVERY [REG V] = NO VAPOR RECOVERY SYSTEM IS USED TO CONTROL EMISSIONS</p>	

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

\*\* - Notes changes made to the automated results from the DSS, and a brief explanation why

## 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](http://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](http://www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html)

<b>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.</b>	
Authorization No.: 20311	Issuance Date: 01/13/2012
Authorization No.: 42213	Issuance Date: 04/12/2010
<b>Permits By Rule (30 TAC Chapter 106) for the Application Area</b>	
Number: 106.263	Version No./Date: 03/14/1997
Number: 106.263	Version No./Date: 09/04/2000
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.475	Version No./Date: 03/14/1997
Number: 5	Version No./Date: 07/20/1992
Number: 34	Version No./Date: 09/12/1989
Number: 51	Version No./Date: 07/20/1992
Number: 75	Version No./Date: 07/20/1992
Number: 107	Version No./Date: 07/20/1992

## 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 sandblasting 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  
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:

<b>Unit/Group/Process Information</b>	
ID No.: DEGREASER	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Degreasing Processes	SOP Index No.: R115-1
Pollutant: VOC	Main Standard: § 115.412(1)
<b>Monitoring Information</b>	
Indicator: Inspect equipment	
Minimum Frequency: Monthly	
Averaging Period: n/a	
Deviation Limit: Any monitoring data which indicates that the cold cleaner is not in compliance with the applicable requirements of 30 TAC §115.412(1)(A), (1)(C), (1)(D), and (1)(F) shall be considered and reported as a deviation.	
Basis of monitoring: The monitoring option to cover cold cleaner or the open-top vapor cleaner was included in the EPA “Periodic Monitoring Technical Reference Document” (April 1999) to monitor VOC sources. In addition to covering the cleaner, records of monthly inspections of equipment is an effective way to ensure that the system is operating in accordance with its design.	

<b>Unit/Group/Process Information</b>	
ID No.: GRP-DECANTERS	
Control Device ID No.: H-7902	Control Device Type: Flare
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Water Separation	SOP Index No.: R115-1
Pollutant: VOC	Main Standard: § 115.132(a)(3)
<b>Monitoring Information</b>	
Indicator: Pilot Flame	
Minimum Frequency: Once per hour	
Averaging Period: n/a	
Deviation Limit: Absence of pilot flame.	
<p>Basis of monitoring:  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.</p>	

<b>Unit/Group/Process Information</b>	
ID No.: GRP-DECANTERS	
Control Device ID No.: GRPBOIL AB	Control Device Type: Steam Generating Unit (Boiler)/Process Heater (Design heat input is less than 44MW)
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Water Separation	SOP Index No.: R115-1
Pollutant: VOC	Main Standard: § 115.132(a)(3)
<b>Monitoring Information</b>	
Indicator: Exhaust Gas Temperature	
Minimum Frequency: Once per week	
Averaging Period: n/a*	
Deviation Limit: Minimum exhaust gas temperature shall not be below 350 degrees F.	
<p>Basis of monitoring:  It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for boilers/process heaters. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of combustion temperature of a boiler/process heater is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, DD, and HH; and 30 TAC Chapter 115.</p>	

\*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

<b>Unit/Group/Process Information</b>	
ID Nos.: GRP-VENTS2, VE-4, VE-5, VE-11 STACK	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R111-1
Pollutant: OPACITY	Main Standard: § 111.111(a)(1)(B)
<b>Monitoring Information</b>	
Indicator: Visible Emissions	
Minimum Frequency: once per calendar quarter	
Averaging Period: n/a	
Deviation Limit: There shall be no visible emissions. If visible emissions are observed, the permit holder shall either report a deviation or perform Test Method 9 and opacity shall not exceed 20%.	
<p>Basis of monitoring:  The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations. The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

<b>Unit/Group/Process Information</b>	
ID No.: VE-8	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R111-1
Pollutant: OPACITY	Main Standard: § 111.111(a)(1)(C)
<b>Monitoring Information</b>	
Indicator: Visible Emissions	
Minimum Frequency: once per week	
Averaging Period: n/a	
Deviation Limit: There shall be no visible emissions. If visible emissions are observed, the permit holder shall either report a deviation or perform Test Method 9 and opacity shall not exceed 15%.	
<p>Basis of monitoring:  The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations. The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

<b>Unit/Group/Process Information</b>	
ID No.: VE-11	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 40 CFR Part 60, Subpart GG	SOP Index No.: 60GG-1
Pollutant: NO <sub>x</sub>	Main Standard: § 60.332(a)(2)
<b>Monitoring Information</b>	
Indicator: Fuel Consumption	
Minimum Frequency: once per week	
Averaging Period: n/a*	
Deviation Limit: Maximum fuel consumption limit shall not exceed 61.3 MMBtu/hr.	
<p>Basis of monitoring:  It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a correlation between fuel consumption and emission rates. In situations where such a correlation exists, measuring, calculating and recording the fuel consumption rate indicates whether the emission limitation or standard is being met.</p>	

\*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

<b>Unit/Group/Process Information</b>	
ID No.: VE-11	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 40 CFR Part 60, Subpart GG	SOP Index No.: 60GG-1
Pollutant: NO <sub>x</sub>	Main Standard: § 60.332(a)(2)
<b>Monitoring Information</b>	
Indicator: NO <sub>x</sub> concentration	
Minimum Frequency: Once per quarter	
Averaging Period: n/a*	
Deviation Limit: Maximum NO <sub>x</sub> concentration shall not exceed 186 ppmv.	
<p>Basis of monitoring:  It is widely practiced and accepted to calibrate and use a portable analyzer or NO<sub>x</sub> CEMS/PEMS to measure NO<sub>x</sub> concentration with procedures such as EPA Test Method 7. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Additionally, measuring the NO<sub>x</sub> concentration is provided as a monitoring option for any control device because an increase in NO<sub>x</sub> concentration may be indicative of the control device performance. Outlet NO<sub>x</sub> concentration has been used as an indicator in many federal and state rules.</p>	

**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:

<b>Unit/Group/Process Information</b>	
ID No.: PRO-POLY	
Control Device ID No.: H-7901	Control Device Type: Flare
Control Device ID No.: H-7902	Control Device Type: Flare
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R115-1
Pollutant: VOC	Main Standard: § 115.121(a)(1)
<b>Monitoring Information</b>	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: n/a	
Deviation Limit: Absence of all pilot flames. The presence of at least one pilot flame shall be considered sufficient to demonstrate compliance.	
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.	

<b>Unit/Group/Process Information</b>	
ID No.: PRO-POLY	
Control Device ID No.: H-7601A	Control Device Type: Steam Generating Unit (Boiler)/Process Heater (Design heat input is less than 44MW)
Control Device ID No.: H-7601B	Control Device Type: Steam Generating Unit (Boiler)/Process Heater (Design heat input is less than 44MW)
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R115-2
Pollutant: VOC	Main Standard: § 115.121(a)(1)
<b>Monitoring Information</b>	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: Once per day	
Averaging Period: n/a*	
Deviation Limit: Minimum combustion temperature/exhaust gas temperature shall not be below 350 degrees F.	
Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for boilers/process heaters. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of combustion temperature of a boiler/process heater is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, DD, and HH; and 30 TAC Chapter 115.	

\*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

### **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 Semicheical 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