

# Statement of Basis of the Federal Operating Permit

Chevron Phillips Chemical Company, LP

Site Name: Chevron Phillips Chemical Cedar Bayou Plant

Area Name: Polyethylene Unit (PEU 1796)

Physical Location: 9500 Interstate 10 E

Nearest City: Baytown

County: Harris

Permit Number: O3247

Project Type: Renewal

Standard Industrial Classification (SIC) Code: 2869

SIC Name: Industrial Organic Chemicals

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). Per 30 TAC §§ 122.241 and 243, the permit holder has submitted an application under § 122.134 for permit renewal. This document may include the following information:

- A description of the facility/area process description;
- 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: December 17, 2015

## Operating Permit Basis of Determination

### Permit Area Process Description

The Polyethylene Unit (PEU 1976) uses British Petroleum technology to produce linear low-density polyethylene (LLDPE) and high-density polyethylene (HDPE) by using two fluid bed reactors, two compounding lines, and a common catalyst preparation unit. Reagents used in the preparation of the polymerization catalyst are stored in nitrogen pressurized vessels that are vented through scrubbers containing mineral oil to control emissions. The catalyst used in the polymerization reaction is prepared via a proprietary process. Olefin feedstocks (ethylene, butene, and hexene), along with pentane, hydrogen and nitrogen, are treated to remove impurities in fixed bed treaters/absorbers. The hexane-based solvent used in various areas of the process is recycled to this section for purification and reuse. Internal floating roof tanks are used to store fresh hexane and slop hydrocarbons. The polymerization area includes the fluid bed reactors and recycle gas compressors that are vented to either a relief system or a Vapor Recovery System. Multiple stages of stripping with nitrogen are used in the powder degassing system to reduce the residual hydrocarbon vapors to extremely low levels and also deactivate the catalyst. A very low concentration of hydrocarbon vapor exits the degasser and is routed to the catalytic incinerator. Purge streams from Polymerization and Powder Degassing are processed in the Vapor Recovery Section to reclaim condensable olefins and solvent. Non-condensable solvents are sent to the Ethylene Unit (EU 1592) as feed or to the relief system and flared. A compression/refrigeration unit is used to reclaim condensable hydrocarbons purged from the Powder Degassing Section and the Polymerization Section. Non-condensable vapors in stream 207A are normally sent to the Ethylene Unit (EU-1592) as feed or to the relief system and flared. Polymer powder is air-conveyed to the extruder feed silos where it is mixed with other additives and then extruded and pelletized. Air used in the conveyors is vented through bag filters to control emissions. The Polymer pellets are stored in silos prior to loading into railcars.

### 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: O2113, O2114, O2115, O2370

### Major Source Pollutants

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	VOC, PM, NOX, HAPS, CO
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### Reading State of Texas’s 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, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions**

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by

30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit’s Applicable Requirement Summary. This is consistent with EPA’s White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3.A. for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

### **Federal Regulatory Applicability Determinations**

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

<b>Regulatory Program</b>	<b>Applicability (Yes/No)</b>
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)	Yes
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*
EMG-591	30 TAC Chapter 117, Subchapter B	R7ICI-01	Type of Service = Existing diesel fuel-fired engine, located in the Houston/Galveston/Brazoria ozone nonattainment area, operated less than 100 hours/year, on a rolling 12-month average that has not been modified, reconstructed or relocated on or after October 1, 2001
TK-561	30 TAC Chapter 115, Storage of VOCs	R5112-01	<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 using an internal floating roof (IFR)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 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-561	40 CFR Part 60, Subpart Kb	60Kb-01	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 2.2 psia but less than 4.0 psia</p> <p>Storage Vessel Description = Fixed roof with an internal floating roof using a liquid-mounted seal</p>
TK-561	40 CFR Part 63, Subpart FFFF	63FFFF-1	<p>Emission Standard = HAP vapor pressure is &lt; 76.6 and the unit is complying with 40 CFR Part 63, subpart WW per § 63.2470(a)-Table 4.1.b.i.</p> <p>WW Tank Control = An internal floating roof is operated and maintained per 40 CFR § 63.1062(a)(1).</p> <p>Notification = The referencing subpart requires notification of initial startup.</p> <p>Unslotted Guide Pole = The tank uses an unslotted guide pole.</p> <p>Seal Configuration = Mechanical shoe seal.</p>
TK-760	30 TAC Chapter 115, Storage of VOCs	R5112-01	<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 using an internal floating roof (IFR)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p>
TK-760	40 CFR Part 60, Subpart Kb	60Kb-01	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia</p> <p>Storage Vessel Description = Fixed roof with an internal floating roof using a liquid-mounted seal</p>
TK-760	40 CFR Part 63, Subpart FFFF	63FFFF-01	<p>Emission Standard = HAP vapor pressure is &lt; 76.6 and the unit is complying with 40 CFR Part 63, subpart WW per § 63.2470(a)-Table 4.1.b.i.</p> <p>WW Tank Control = An internal floating roof is operated and maintained per 40 CFR § 63.1062(a)(1).</p> <p>Notification = The referencing subpart requires notification of initial startup.</p> <p>Unslotted Guide Pole = The tank uses an unslotted guide pole.</p> <p>Seal Configuration = Liquid-mounted seal.</p>

<b>Unit ID</b>	<b>Regulation</b>	<b>Index Number</b>	<b>Basis of Determination*</b>
VE-025-0	30 TAC Chapter 115, Storage of VOCs	R5112-01	<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 using a submerged fill pipe</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 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>
VE-026-0	30 TAC Chapter 115, Storage of VOCs	R5112-01	<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 using a submerged fill pipe</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 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>
VE-041-0	30 TAC Chapter 115, Storage of VOCs	R5112-01	<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 using a submerged fill pipe</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 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>
VE-042-0	30 TAC Chapter 115, Storage of VOCs	R5111	<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>
VE-043-0	30 TAC Chapter 115, Storage of VOCs	R5111	<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>
LOAD	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-01	<p>Chapter 115 Control Device Type = Vapor control system with a flare.</p> <p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Vapor Tight = All liquid and vapor lines are equipped with fittings which make vapor-tight connections that close automatically when disconnected.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline.</p> <p>Transfer Type = Only loading.</p> <p>True Vapor Pressure = True vapor pressure greater than or equal to 0.5 psia.</p> <p>Daily Throughput = Daily throughput not determined since 30 TAC § 115.217(a)(2)(A) or 30 TAC § 115.217(b)(3)(A) exemption is not utilized.</p> <p>Control Options = Vapor control system that maintains a control efficiency of at least 90%.</p>
LOAD	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-02	<p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline.</p> <p>Transfer Type = Only loading.</p> <p>True Vapor Pressure = True vapor pressure less than 0.5 psia.</p>
UNLOAD	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-01	<p>Chapter 115 Control Device Type = Vapor control system with a flare.</p> <p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Vapor Tight = All liquid and vapor lines are equipped with fittings which make vapor-tight connections that close automatically when disconnected.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline.</p> <p>Transfer Type = Only unloading.</p> <p>True Vapor Pressure = True vapor pressure greater than or equal to 0.5 psia.</p> <p>Daily Throughput = Daily throughput not determined since 30 TAC § 115.217(a)(2)(A) or 30 TAC § 115.217(b)(3)(A) exemption is not utilized.</p> <p>Control Options = Vapor control system that maintains a control efficiency of at least 90%.</p>
UNLOAD	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-02	<p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline.</p> <p>Transfer Type = Only unloading.</p> <p>True Vapor Pressure = True vapor pressure less than 0.5 psia.</p>
FS-541	30 TAC Chapter 111, Visible Emissions	R1111-01	<p>Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1.</p> <p>Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.</p>
FS-541	30 TAC Chapter 115, HRVOC Vent Gas	R5722-01	<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>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>§115.725(e) Requirements = Flare is complying with the requirements of § 115.725(d).</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>Multi-Purpose Usage = Flare is used for abatement of emissions from scheduled or undcheduled maintenance, startup or shutdown activities AND as an emergency flare.</p> <p>Flow Rate = Flow rate of the gas routed to the flare is determined using the requirements of § 115.725(d)(1).</p> <p>Alternative Monitoring = No alternative monitoring and test methods are used.</p> <p>Physical Seal = Flare is equipped with a flow monitor or indicator.</p> <p>Minor Modificaiton = 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>
FS-541	40 CFR Part 60, Subpart A	60A-01	<p>Subject to 40 CFR § 60.18 = Flare is subject to 40 CFR § 60.18.</p> <p>Adhering to Heat Content Specifications = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4).</p> <p>Flare Assist Type = Steam-assisted</p> <p>Flare Exit Velocity = Flare exit velocity is less than 60 ft/s (18.3 m/sec)</p>
FS-541	40 CFR Part 60, Subpart A	60A-02	<p>Subject to 40 CFR § 60.18 = Flare is subject to 40 CFR § 60.18.</p> <p>Adhering to Heat Content Specifications = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4).</p> <p>Flare Assist Type = Steam-assisted</p> <p>Flare Exit Velocity = Flare exit velocity is greater than or equal to 60 ft/s (18.3 m/sec) but less than 400 ft/s (122 m/sec).</p> <p>Heating Value of Gas = Heating value is greater than 1000 Btu/scf (37.3 MJ/scm)</p>
FS-541	40 CFR Part 60, Subpart A	60A-03	<p>Subject to 40 CFR § 60.18 = Flare is subject to 40 CFR § 60.18.</p> <p>Adhering to Heat Content Specifications = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4).</p> <p>Flare Assist Type = Steam-assisted</p> <p>Flare Exit Velocity = Flare exit velocity is greater than or equal to 60 ft/s (18.3 m/sec) but less than 400 ft/s (122 m/sec).</p> <p>Heating Value of Gas = Heating value is less than or equal to 1000 Btu/scf (37.3 MJ/scm).</p>
FS-541	40 CFR Part 63, Subpart A	63A-01	<p>Required Under 40 CFR Part 63 = Flare is required by a Subpart under 40 CFR Part 63.</p> <p>Heat Content Specification = Adhering to the heat content specifications in 40 CFR § 63.11(b)(6)(ii) and the maximum tip velocity specifications in 40 CFR § 63.11(b)(7) or 40 CFR § 63.11(b)(8).</p> <p>Flare Assist Type = Steam assisted</p> <p>Flare Exit Velocity = Flare exit velocity is less than 60 ft/s (18.3 m/sec)</p>
FS-541	40 CFR Part 63, Subpart A	63A-02	<p>Required Under 40 CFR Part 63 = Flare is required by a Subpart under 40 CFR Part 63.</p> <p>Heat Content Specification = Adhering to the heat content specifications in 40 CFR § 63.11(b)(6)(ii) and the maximum tip velocity specifications in 40 CFR § 63.11(b)(7) or 40 CFR § 63.11(b)(8).</p> <p>Flare Assist Type = Steam assisted</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Flare Exit Velocity = Flare exit velocity is greater than or equal to 60 ft/s (18.3 m/sec) but less than 400 ft/s (122 m/sec).</p> <p>Heating Value of Gas = Heating value is greater than 1000 Btu/scf (37.3 MJ/scm).</p>
FS-541	40 CFR Part 63, Subpart A	63A-03	<p>Required Under 40 CFR Part 63 = Flare is required by a Subpart under 40 CFR Part 63.</p> <p>Heat Content Specification = Adhering to the heat content specifications in 40 CFR § 63.11(b)(6)(ii) and the maximum tip velocity specifications in 40 CFR § 63.11(b)(7) or 40 CFR § 63.11(b)(8).</p> <p>Flare Assist Type = Steam assisted</p> <p>Flare Exit Velocity = Flare exit velocity is greater than or equal to 60 ft/s (18.3 m/sec) but less than 400 ft/s (122 m/sec).</p> <p>Heating Value of Gas = Heating value is less than or equal to 1000 Btu/scf (37.3 MJ/scm).</p>
1796-12A	30 TAC Chapter 115, HRVOC Fugitive Emissions	R5780-ALL	<p>Agitators = The fugitive unit does not contain agitators.</p> <p>Compressor Seals = The fugitive unit contains 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 does not contain 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>Weight Percent HRVOC = All components contact only a process fluid that contains at least 5.0% HRVOC by weight on an annual average basis.</p> <p>Bypass Line Valves = The fugitive unit does not contain bypass line valves.</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>
1796-12A	30 TAC Chapter 115, Pet. Refinery & Petrochemicals	R5352-ALL	<p>SOP/GOP Index No. = Owner/Operator assumes VOC fugitive control requirements for all components subject to 30 TAC Chapter 115, Subchapter D, Division 3 with no alternate control or control device.</p> <p>Compressor Seals = The fugitive unit contains compressor seals.</p> <p>Pressure Relief Valves = The fugitive unit contains pressure relief valves.</p> <p>Process Drains = The fugitive unit has process drains.</p> <p>Pump Seals = The fugitive unit contains pump seals.</p> <p>Title 30 TAC § 115.352 Applicable = Site is a petroleum refinery, synthetic organic chemical, polymer resin or methyl tert-butyl ether manufacturing process or a natural gas/gasoline processing operation as defined in 30 TAC 115.10.</p> <p>Alternate Control Requirement = The TCEQ Executive Director has not approved an alternate method for demonstrating and documenting continuous compliance with an alternate control requirement or exemption criteria for process drains or no alternate has been requested.</p> <p>Less Than 250 Components at Site = Fugitive unit not located at site with less than 250 fugitive components.</p> <p>Weight Percent VOC = All components contact a process fluid that contains greater than or equal to 10% VOC by weight.</p> <p>Complying with 30 TAC § 115.352(1) = Process drains are complying with the requirements in 30 TAC § 115.352(1).</p> <p>Reciprocating Compressors Or Positive Displacement Pumps = The fugitive unit has reciprocating compressors or positive displacement pumps used in natural gas/gasoline processing operations.</p> <p>TVP of Process Fluid VOC &lt;= 0.044 PSIA AT 68° F = Process drains contact a process fluid containing VOC having a true vapor</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>pressures less than or equal to 0.044 psia at 68 degrees Fahrenheit.</p> <p>Complying with 30 TAC § 115.352(1) = Pump seals are complying with the requirements in 30 TAC § 115.352(1).</p> <p>TVP of Process Fluid VOC &gt; 0.044 PSIA AT 68° F = Process drains contact a process fluid containing VOC having a TVP greater than 0.044 psia at 68 degrees Fahrenheit.</p> <p>Complying With § 115.352(1) = Compressor seals are complying with the requirements in 30 TAC § 115.352(1).</p>
1796-12A	40 CFR Part 60, Subpart DDD	60DDD-ALL	<p>SOP Index No. = Owner of operator assumes fugitive control requirements for all components in VOC service subject to 40 CFR Part 60, Subpart DDD with no alternate control or control device.</p> <p>FLANGES AND OTHER CONNECTORS (ANY SERVICE) [NSPS DDD] = FLANGES OR CONNECTORS IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>FLARE = USING A FLARE FOR CONTROL</p> <p>MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE</p> <p>OPEN-ENDED VALVES OR LINES (ANY SERVICE) [NSPS DDD] = OPEN-ENDED VALVES OR LINES IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>PRESSURE RELIEF DEVICES IN GAS/VAPOR SERVICE [NSPS DDD] = PRESSURE RELIEF DEVICES IN GAS/VAPOR SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>PUMPS IN LIGHT LIQUID SERVICE [NSPS DDD] = PUMPS IN LIGHT LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE [NSPS DDD] = VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>VAPOR RECOVERY SYSTEM = NOT USING A VAPOR RECOVERY SYSTEM FOR CONTROL</p> <p>CONTINUOUS PROCESS [NSPS DDD] = THE AFFECTED FACILITY IS A CONTINUOUS PROCESS</p> <p>EQUIVALENT EMISSION LIMITATION (EEL)--FLANGES AND OTHER CONNECTORS [NSPS DDD] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>EQUIVALENT EMISSION LIMITATION (EEL)--OPEN-ENDED VALVES OR LINES [NSPS DDD] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>EQUIVALENT EMISSION LIMITATION (EEL)--PUMPS LIGHT LIQUID SERVICE [NSPS DDD] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>40 CFR 60 (NSPS) SUBPART DDD CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE = AFTER JANUARY 10, 1989</p> <p>COMPLYING WITH § 60.482-2 = YES</p> <p>COMPLYING WITH § 60.482-6 = YES</p> <p>COMPLYING WITH § 60.482-7 = YES</p> <p>COMPLYING WITH § 60.482-8 = YES</p> <p>COMPLYING WITH §60.482-10 = YES</p> <p>CLOSED VENT SYSTEMS AND CONTROL DEVICES (ANY SERVICE) [NSPS DDD] = CLOSED VENT SYSTEM AND CONTROL DEVICES IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>COMPLYING WITH § 60.482-8 = YES</p> <p>COMPRESSORS (ANY SERVICE) [NSPS DDD] = COMPRESSORS IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>PUMPS IN HEAVY LIQUID SERVICE [NSPS DDD] = PUMPS IN HEAVY LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>VALVES IN HEAVY LIQUID SERVICE [NSPS DDD] = VALVES IN HEAVY LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS)</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>ENCLOSED COMBUSTION DEV. = NOT USING AN ENCLOSED COMBUSTION DEVICE FOR CONTROL</p> <p>EQUIVALENT EMISSION LIMITATION (EEL)-[NSPS DDD] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>EQUIVALENT EMISSION LIMITATION (EEL)--COMPRESSORS [NSPS DDD] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>EQUIVALENT EMISSION LIMITATION (EEL)--PUMPS HEAVY LIQUID SERVICE [NSPS DDD] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>EQUIVALENT EMISSION LIMITATION (EEL)--VALVES HEAVY LIQUID SERVICE [NSPS DDD] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>SAMPLING CONNECTION SYSTEMS (ANY SERVICE) [NSPS DDD] = SAMPLING CONNECTION SYSTEMS IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT.</p> <p>EQUIVALENT EMISSION LIMITATION (EEL)--SAMPLING CONNECTION SYSTEMS [NSPS DDD] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>COMPLYING WITH § 60.482-3 = YES</p> <p>COMPLYING WITH § 60.482-8 = YES</p> <p>COMPLYING WITH §60.482-10 = YES</p> <p>COMPLYING WITH § 60.482-5 = YES</p>
1796-12A	40 CFR Part 63, Subpart FFFF	63FFFF-01	Existing Source = Fugitive unit contains equipment in an existing Miscellaneous Chemical Processing Unit.
E-531	30 TAC Chapter 115, HRVOC Cooling Towers	R5760	<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 = Alternative monitoring and testing methods approved by the executive director as allowed in § 115.764(f) are being used.</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 use the maximum potential flow rate based on the manufacturer's pump performance data in accordance with §115.764(e)(1).</p> <p>Total Strippalbe 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>
G-544	30 TAC Chapter 115, Water Separation	R5131-01	<p>Alternate Control Requirement = 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 = Any single or multiple compartment VOC water separator which separates materials having a true vapor pressure less than 0.5 psia (3.4 kPa) obtained from any equipment.</p>
1796-19A	30 TAC Chapter 115, HRVOC Vent Gas	R5722-01	<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>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Vent Gas Stream Control = Vent gas stream is uncontrolled.</p> <p>Process Knowledge = Process knowledge and engineering calculations 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 = Continuous emissions monitoring system in lieu of testing requirements in § 115.725(a).</p>
1796-19A	30 TAC Chapter 115, Vent Gas Controls	R5121-01	<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 = Vent gas stream is emitted from a liquid phase slurry high-density polyethylene manufacturing process.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is greater than 100 pounds (45.4 kg).</p> <p>VOC Concentration = VOC concentration is less than 408 ppmv.</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>
1796-19A	30 TAC Chapter 115, Vent Gas Controls	R5121-02	<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 = Vent gas stream is emitted from a liquid phase slurry high-density polyethylene manufacturing process.</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 = VOC concentration is less than 408 ppmv.</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>
1796-19A	40 CFR Part 63, Subpart FFFF	63FFFF-01	<p>Designated Grp1 = The emission stream is determined to be Group 1.</p> <p>Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1).</p> <p>Recovery Device = The TRE index is maintained without a recovery device.</p>
1796-19B	30 TAC Chapter 115, HRVOC Vent Gas	R5722-01	<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 uncontrolled.</p> <p>Process Knowledge = Process knowledge and engineering calculations 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 = Continuous emissions monitoring system in lieu of testing requirements in § 115.725(a).</p>
1796-19B	30 TAC Chapter 115, Vent Gas Controls	R5121-01	<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>

Unit ID	Regulation	Index Number	Basis of Determination*
			<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 = Vent gas stream is emitted from a liquid phase slurry high-density polyethylene manufacturing process.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is greater than 100 pounds (45.4 kg).</p> <p>VOC Concentration = VOC concentration is less than 408 ppmv.</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>
1796-19B	30 TAC Chapter 115, Vent Gas Controls	R5121-02	<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 = Vent gas stream is emitted from a liquid phase slurry high-density polyethylene manufacturing process.</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 = VOC concentration is less than 408 ppmv.</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>
1796-19B	40 CFR Part 63, Subpart FFFF	63FFFF-01	<p>Designated Grp1 = The emission stream is determined to be Group 1.</p> <p>Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1).</p> <p>Recovery Device = The TRE index is maintained without a recovery device.</p>
FS541VENTS	30 TAC Chapter 115, HRVOC Vent Gas	R5722-01	<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>
FS541VENTS	30 TAC Chapter 115, Vent Gas Controls	R5121-01	<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 = Smokeless flare</p> <p>Vent Type = Vent gas stream is emitted from a liquid phase slurry high-density polyethylene manufacturing process.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is greater than 100 pounds (45.4 kg).</p> <p>VOC Concentration = VOC concentration is greater than or equal to 408 ppmv.</p>
FS541VENTS	30 TAC Chapter 115, Vent Gas Controls	R5121-02	<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>Total Design Capacity = Total design capacity is greater than or equal to 1,100 tons per year for all chemicals produced within that unit.</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>Flow Rate or VOC Concentration = Flow rate is greater than or equal to 0.011 scm/min or the VOC concentration is greater than or</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>equal to 500 ppmv.</p> <p>40 CFR 60 Subpart NNN Requirements = The distillation unit vent gas stream satisfies neither of the following requirements of 40 CFR Part 60, Subpart NNN: TRE index value is greater than 8.0; or TRE index value is greater than 1.0 without the use of VOC emission control devices.</p> <p>Control Device Type = Smokeless flare</p> <p>Vent Type = Vent gas stream emissions of ethylene associated with the formation, handling, and storage of solidified low-density polyethylene in which more than 1.1 pounds of ethylene per 1,000 pounds of product are emitted.</p> <p>40 CFR 60 Subpart RRR Requirements = The reactor process vent gas stream satisfies neither of the following requirements of 40 CFR Part 60, Subpart RRR: TRE index value is greater than 8.0; or TRE index value is greater than 1.0 without the use of VOC emission control devices.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is greater than 100 pounds (45.4 kg).</p> <p>VOC Concentration = VOC concentration is greater than or equal to 612 ppmv.</p>
FS541VENTS	40 CFR Part 63, Subpart FFFF	63FFFF-01	<p>Designated Grp1 = The emission stream is designated as Group 1.</p> <p>Emission Standard = The TRE index is not maintained above the threshold (5.0 for a new source and 1.9 for an existing source) and a flare is being used for control.</p> <p>Designated Hal = The emission stream is not designated as halogenated.</p> <p>Determined Hal = The emission stream is determined to be non-halogenated.</p> <p>Prior Eval = The data from a prior evaluation or assessment is used.</p> <p>Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.</p> <p>Bypass Line = Bypass line valves are secured in the closed position with a car-seal or lock-and-key configuration.</p>
FS541VENTS	40 CFR Part 63, Subpart FFFF	63FFFF-02	<p>Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1).</p> <p>Recovery Device = The TRE index is maintained without a recovery device.</p>
FS541VENTS	40 CFR Part 63, Subpart FFFF	63FFFF-BPV	<p>Comb Device = A combustion control device is being used.</p> <p>95% Scrubber = The combustion device is not followed by a scrubber or is followed by a scrubber AND the 95% reduction efficiency requirement is not met.</p> <p>Perf Test = A performance test is not conducted.</p> <p>Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.</p> <p>Bypass Line = Bypass line valves are secured in the closed position with a car-seal or lock-and-key configuration.</p>
GRPPFINISH	30 TAC Chapter 115, HRVOC Vent Gas	R5722-01	<p>HRVOC Concentration = The vent gas stream has a HRVOC concentration less than 100 ppmv at all 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>Exempt Date = The vent gas stream is not exempt.</p>
GRPPFINISH	30 TAC Chapter 115, Vent Gas Controls	R5121-01	<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>Vent Type = Vent gas stream is emitted from a liquid phase slurry high-density polyethylene manufacturing process.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is greater than 100 pounds (45.4 kg).</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>VOC Concentration = VOC concentration is less than 408 ppmv.</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>
GRPPFINISH	30 TAC Chapter 115, Vent Gas Controls	R5121-02	<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 = Vent gas stream is emitted from a liquid phase slurry high-density polyethylene manufacturing process.</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 = VOC concentration is less than 408 ppmv.</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>
GRPPFINISH	30 TAC Chapter 115, Vent Gas Controls	R5121-03	<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 = Vent gas stream emissions of ethylene associated with the formation, handling, and storage of solidified low-density polyethylene in which more than 1.1 pounds of ethylene per 1,000 pounds of product are emitted.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is greater than 100 pounds (45.4 kg).</p> <p>VOC Concentration = VOC concentration is less than 612 ppmv.</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>
GRPPFINISH	30 TAC Chapter 115, Vent Gas Controls	R5121-04	<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 = Vent gas stream emissions of ethylene associated with the formation, handling, and storage of solidified low-density polyethylene in which more than 1.1 pounds of ethylene per 1,000 pounds of product are emitted.</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 = VOC concentration is less than 612 ppmv.</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>
H549VENTS	30 TAC Chapter 115, Vent Gas Controls	R5121-01	<p>Alternate Control Requirement = Alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria and demonstrating substantially equivalent reduction efficiencies approved by the TCEQ Executive Director.</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</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Control Device Type = Chiller or catalytic incinerator.</p> <p>Vent Type = Vent gas stream is emitted from a liquid phase slurry high-density polyethylene manufacturing process.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is greater than 100 pounds (45.4 kg).</p> <p>VOC Concentration = VOC concentration is greater than or equal to 408 ppmv.</p>
H549VENTS	30 TAC Chapter 115, Vent Gas Controls	R5121-02	<p>Alternate Control Requirement = Alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria and demonstrating substantially equivalent reduction efficiencies approved by the TCEQ Executive Director.</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 = Chiller or catalytic incinerator.</p> <p>Vent Type = Vent gas stream emissions of ethylene associated with the formation, handling, and storage of solidified low-density polyethylene in which more than 1.1 pounds of ethylene per 1,000 pounds of product are emitted.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is greater than 100 pounds (45.4 kg).</p> <p>VOC Concentration = VOC concentration is greater than or equal to 612 ppmv.</p>
H549VENTS	30 TAC Chapter 115, Vent Gas Controls	R5121-03	<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 = Smokeless flare</p> <p>Vent Type = Vent gas stream is emitted from a liquid phase slurry high-density polyethylene manufacturing process.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is greater than 100 pounds (45.4 kg).</p> <p>VOC Concentration = VOC concentration is greater than or equal to 408 ppmv.</p>
H549VENTS	30 TAC Chapter 115, Vent Gas Controls	R5121-04	<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 = Smokeless flare</p> <p>Vent Type = Vent gas stream emissions of ethylene associated with the formation, handling, and storage of solidified low-density polyethylene in which more than 1.1 pounds of ethylene per 1,000 pounds of product are emitted.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is greater than 100 pounds (45.4 kg).</p> <p>VOC Concentration = VOC concentration is greater than or equal to 612 ppmv.</p>
H549VENTS	40 CFR Part 63, Subpart FFFF	63FFFF-01	<p>Designated Grp1 = The emission stream is designated as Group 1.</p> <p>Emission Standard = The TRE index is not maintained above the threshold (5.0 for a new source and 1.9 for an existing source) and a non-flare CD is being used to meet 98% reduction per § 63.2455(a) - Table 1.1.a.i.</p> <p>Hal Device Type = No halogen scrubber or other halogen reduction device is used.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Meets 63.988(b)(2) = The control device does not meet the criteria in § 63.985(b)(2).</p> <p>Small Device = A small control device (defined in § 63.2550) is not being used.</p> <p>Designated Hal = The emission stream is not designated as halogenated.</p> <p>Prior Eval = The data from a prior evaluation or assessment is not used.</p> <p>Assessment Waiver = The Administrator has not granted a waiver of compliance assessment or no waiver is requested.</p> <p>Determined Hal = The emission stream is determined to be non-halogenated.</p> <p>Alt 63SS Mon Parameters = Alternate monitoring parameters or requirements have been approved by the Administrator.</p> <p>Formaldehyde = The stream does not contain formaldehyde.</p> <p>Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.</p> <p>Bypass Line = No bypass lines.</p> <p>SS Device Type = Catalytic incinerator.</p>
H549VENTS	40 CFR Part 63, Subpart FFFF	63FFFF-02	<p>Designated Grp1 = The emission stream is designated as Group 1.</p> <p>Emission Standard = The TRE index is not maintained above the threshold (5.0 for a new source and 1.9 for an existing source) and a non-flare CD is being used to meet a ppmv standard per § 63.2455(a) - Table 1.1.a.i.</p> <p>Hal Device Type = No halogen scrubber or other halogen reduction device is used.</p> <p>Meets 63.988(b)(2) = The control device does not meet the criteria in § 63.985(b)(2).</p> <p>Small Device = A small control device (defined in § 63.2550) is not being used.</p> <p>Designated Hal = The emission stream is not designated as halogenated.</p> <p>Prior Eval = The data from a prior evaluation or assessment is not used.</p> <p>Assessment Waiver = The Administrator has not granted a waiver of compliance assessment or no waiver is requested.</p> <p>Determined Hal = The emission stream is determined to be non-halogenated.</p> <p>Alt 63SS Mon Parameters = Alternate monitoring parameters or requirements have been approved by the Administrator.</p> <p>Formaldehyde = The stream does not contain formaldehyde.</p> <p>Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.</p> <p>Bypass Line = No bypass lines.</p> <p>SS Device Type = Catalytic incinerator.</p>
H549VENTS	40 CFR Part 63, Subpart FFFF	63FFFF-03	<p>Designated Grp1 = The emission stream is designated as Group 1.</p> <p>Emission Standard = The TRE index is not maintained above the threshold (5.0 for a new source and 1.9 for an existing source) and a flare is being used for control.</p> <p>Designated Hal = The emission stream is not designated as halogenated.</p> <p>Determined Hal = The emission stream is determined to be non-halogenated.</p> <p>Prior Eval = The data from a prior evaluation or assessment is used.</p> <p>Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.</p> <p>Bypass Line = Bypass line valves are secured in the closed position with a car-seal or lock-and-key configuration.</p>
H549VENTS	40 CFR Part 63, Subpart FFFF	63FFFF-BPV	<p>Comb Device = A combustion control device is being used.</p> <p>95% Scrubber = The combustion device is not followed by a scrubber or is followed by a scrubber AND the 95% reduction efficiency requirement is not met.</p> <p>Perf Test = A performance test is not conducted.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.</p> <p>Bypass Line = No bypass lines.</p>
GRPFINISH	40 CFR Part 60, Subpart DDD	60DDD-05	<p>Control of Continuous Emissions = Vent gas stream emissions are not controlled with an existing control device (as defined in 40 CFR § 60.561).</p> <p>Manufactured Product = Polypropylene or polyethylene.</p> <p>Polyolefin Production = Only one polyolefin is produced or no polyolefin is produced.</p> <p>Continuous Process = The affected facility process is continuous.</p> <p>Process Emissions = Individual vent gas streams emit continuous emissions.</p> <p>Construction/Modification Date = After January 10, 1989.</p> <p>Uncontrolled Annual Emissions = Uncontrolled annual emissions are less than 1.6 Mg/yr (1.76 tpy).</p> <p>Experimental Process Line = the affected facility is a production process line.</p>
GRPFINISH	40 CFR Part 60, Subpart DDD	60DDD-06	<p>Control of Continuous Emissions = Vent gas stream emissions are not controlled with an existing control device (as defined in 40 CFR § 60.561).</p> <p>Manufactured Product = Polypropylene or polyethylene.</p> <p>Polyolefin Production = Only one polyolefin is produced or no polyolefin is produced.</p> <p>Continuous Process = The affected facility process is continuous.</p> <p>Process Emissions = Individual vent gas streams emit continuous emissions.</p> <p>Construction/Modification Date = After January 10, 1989.</p> <p>Experimental Process Line = the affected facility is a production process line.</p> <p>Weight Percent TOC = Weight percent of total organic compounds is less than 0.10%.</p>
GRPFINISH	40 CFR Part 60, Subpart DDD	60DDD-07	<p>Control of Continuous Emissions = Vent gas stream emissions are not controlled with an existing control device (as defined in 40 CFR § 60.561).</p> <p>Emergency Vent = Emissions are an emergency vent stream from a new, modified, or reconstructed facility.</p> <p>Manufactured Product = Polypropylene or polyethylene.</p> <p>Polyolefin Production = Only one polyolefin is produced or no polyolefin is produced.</p> <p>Continuous Process = The affected facility process is continuous.</p> <p>Process Emissions = Process contains vent gas streams, some of which are emitted continuously and some which are emitted intermittently.</p> <p>Construction/Modification Date = After January 10, 1989.</p> <p>Experimental Process Line = the affected facility is a production process line.</p>
PROPE1796	40 CFR Part 63, Subpart FFFF	63FFFF-01	<p>&gt;1000 lb/yr = The process has uncontrolled hydrogen halide and halogen HAP emissions from process vents of less than 1,000 lb/yr.</p> <p>Ammonium Sulfate = The MCPU does not include the manufacture of ammonium sulfate as a by-product, or the slurry entering the by-product manufacturing process contains 50 parts per million by weight (ppmw) HAP or less or 10 ppmw benzene or less.</p> <p>Startup 2003 = The affected source startup was before November 10, 2003.</p> <p>Other Operations = The MCPU includes operations other than those listed in § 63.2435(c).</p> <p>Shared Batch Vent = The MCPU does not include a batch process vent that also is part of a CMPU as defined in subparts F and G of this part 63.</p> <p>63.100 CMPU = The MCPU is not a CMPU defined in § 63.100.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>New Source = The MCPU is an existing affected source.</p> <p>PUG = The MCPU is not part of a process unit group (PUG).</p> <p>G2/&lt;1000 lb/yr = The process does not include Group 2 batch process vents and/or uncontrolled hydrogen halide and halogen HAP emissions from the sum of all batch and continuous process vents less than 1,000 lb/yr.</p> <p>Startup 2002 = The affected source initial startup was before April 4, 2002.</p> <p>PP Alt = The MCPU is complying with the emission limitations and work practice standards contained in Tables 1 through 7.</p> <p>Batch Process Vents = The source includes batch process vents.</p>
PROPE1796	40 CFR Part 63, Subpart FFFF	63FFFF-BATCH1	<p>Designated Grp1 = The emission stream is designated as Group 1.</p> <p>Designated HAL = The emission stream is not designated as halogenated.</p> <p>Determined HAL = The emission stream is determined not to be halogenated.</p> <p>Vent Emission Control = Reduce uncontrolled organic HAP emissions from all batch process vents within the process by venting through a closed-vent system to a flare per Table 2.1.c.</p> <p>Prior Eval = The data from a prior evaluation or assessment is used.</p> <p>Negative Pressure = The closed vent system is operated and maintained at atmospheric pressure.</p> <p>Bypass Line = Bypass line valves are secured in the closed position with a car-seal or lock-and-key configuration.</p>
PROPE1796	40 CFR Part 63, Subpart FFFF	63FFFF-BATCH2	<p>Designated Grp1 = The emission stream is designated as Group 1.</p> <p>HAL Device Type = No halogen scrubber or other halogen reduction device is used.</p> <p>Meets 63.988(b)(2) = The control device does not meet the criteria in § 63.988(b)(2).</p> <p>Small Device = A small control device (defined in § 63.2550) is not being used.</p> <p>Designated HAL = The emission stream is not designated as halogenated.</p> <p>Vent Emission Control = Reduce uncontrolled organic HAP emissions from all batch process vents within the process to an outlet concentration of 20 ppmv or less as TOC or total organic HAP by venting to any combination of control devices except a flare.</p> <p>Determined HAL = The emission stream is determined not to be halogenated.</p> <p>Prior Eval = The data from a prior evaluation or assessment is not used.</p> <p>Alt 63SS Mon Parameters = Alternate monitoring parameters or requirements have been approved by the Administrator.</p> <p>Assessment Waiver = The Administrator has not granted a waiver of compliance assessment or no waiver has been requested.</p> <p>Formaldehyde = The stream does not contain formaldehyde.</p> <p>Negative Pressure = The closed vent system is operated and maintained at atmospheric pressure.</p> <p>SS Device Type = Catalytic Incinerator.</p> <p>Bypass Line = No bypass lines.</p>

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

## 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)

The status of air permits and applications and a link to the Air Permits Remote Document Server is located at the following Web site:

[www.tceq.texas.gov/permitting/air/nav/air\\_status\\_permits.html](http://www.tceq.texas.gov/permitting/air/nav/air_status_permits.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.: 19027	Issuance Date: 10/21/2015
Authorization No.: 83791	Issuance Date: 12/06/2012
<b>Permits By Rule (30 TAC Chapter 106) for the Application Area</b>	
Number: 106.122	Version No./Date: 09/04/2000
Number: 106.261	Version No./Date: 09/04/2000
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.262	Version No./Date: 09/04/2000
Number: 106.262	Version No./Date: 11/01/2003
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.264	Version No./Date: 09/04/2000
Number: 106.393	Version No./Date: 09/04/2000
Number: 106.452	Version No./Date: 09/04/2000
Number: 106.454	Version No./Date: 09/04/2000
Number: 106.472	Version No./Date: 09/04/2000
Number: 106.473	Version No./Date: 09/04/2000
Number: 106.476	Version No./Date: 09/04/2000
Number: 106.478	Version No./Date: 09/04/2000

Number: 106.492	Version No./Date: 09/04/2000
Number: 106.511	Version No./Date: 09/04/2000
Number: 106.512	Version No./Date: 09/04/2000
Number: 106.532	Version No./Date: 09/04/2000

**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**

**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.: FS541VENTS	
Control Device ID No.: FS-541	Control Device Type: Flare
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R5121-02
Pollutant: VOC	Main Standard: § 115.121(a)(1)
<b>Monitoring Information</b>	
Indicator: Pilot Flame	
Minimum Frequency: Hourly	
Averaging Period: N/A	
Deviation Limit: Absence of pilot flame. If all monitoring devices indicate absence of pilot flame, it should be confirmed visually. If pilot flame is absent, as indicated by both monitoring devices and visual indication, it should be considered a deviation.	
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.: FS541VENTS	
Control Device ID No.: FS-541	Control Device Type: Fabric Filter
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R5121-01
Pollutant: VOC	Main Standard: § 115.121(a)(2)
<b>Monitoring Information</b>	
Indicator: Pilot Flame	
Minimum Frequency: Hourly	
Averaging Period: N/A	
Deviation Limit: Absence of pilot flame. If all monitoring devices indicate absence of pilot flame, it should be confirmed visually. If pilot flame is absent, as indicated by both monitoring devices and visual indication, it should be considered a deviation.	
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.: H549VENTS	
Control Device ID No.: FS-541	Control Device Type: Flare
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R5121-04
Pollutant: VOC	Main Standard: § 115.121(a)(1)
<b>Monitoring Information</b>	
Indicator: Pilot Flame	
Minimum Frequency: Four times an hour	
Averaging Period: Once an hour	
Deviation Limit: Absence of pilot flame. If all monitoring devices indicate absence of pilot flame, it should be confirmed visually. If pilot flame is absent, as indicated by both monitoring devices and visual indication, it should be considered a deviation.	
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.: H549VENTS	
Control Device ID No.: FS-541	Control Device Type: Flare
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R5121-03
Pollutant: VOC	Main Standard: § 115.121(a)(2)
<b>Monitoring Information</b>	
Indicator: Pilot Flame	
Minimum Frequency: Four times an hour	
Averaging Period: Once per hour	
Deviation Limit: Absence of pilot flame. If all monitoring devices indicate absence of pilot flame, it should be confirmed visually. If pilot flame is absent, as indicated by both monitoring devices and visual indication, it should be considered a deviation.	
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.: H549VENTS	
Control Device ID No.: H-549	Control Device Type: Catalytic Incinerator
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R5121-01
Pollutant: VOC	Main Standard: § 115.123(a)(1)
<b>Monitoring Information</b>	
Indicator: Temperature or VOC	
Minimum Frequency: Hourly	
Averaging Period: N/A	
Deviation Limit: Inlet temperature less than temperature established during last performance test or an exhaust VOC at or less than 20 ppmvd, except during, start-up, shutdown, and product campaign changes.	
<p>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 inlet and outlet gas temperature across the catalyst bed of a catalytic incinerator. These minimum temperatures must be maintained in order for the proper destruction efficiency. Operation below the minimum temperatures will result in incomplete combustion and a loss in the VOC destruction efficiency of the catalytic incinerator. Monitoring the catalyst bed inlet and outlet temperature is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts DD, EE and HH; and 30 TAC Chapter 115.</p>	

<b>Unit/Group/Process Information</b>	
ID No.: H549VENTS	
Control Device ID No.: H-549	Control Device Type: Catalytic Incinerator
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R5121-02
Pollutant: VOC	Main Standard: § 115.123(a)(1)
<b>Monitoring Information</b>	
Indicator: Temperature or VOC	
Minimum Frequency: Hourly	
Averaging Period: N/A	
Deviation Limit: Inlet temperature less than temperature established during last performance test or an exhaust VOC at or less than 20 ppmvd, except during, start-up, shutdown, and product campaign changes.	
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 inlet and outlet gas temperature across the catalyst bed of a catalytic incinerator. These minimum temperatures must be maintained in order for the proper destruction efficiency. Operation below the minimum temperatures will result in incomplete combustion and a loss in the VOC destruction efficiency of the catalytic incinerator. Monitoring the catalyst bed inlet and outlet temperature is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts DD, EE and HH; and 30 TAC Chapter 115.	

**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.: VE-025-0	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-01
Pollutant: VOC	Main Standard: § 115.112(e)(1)
<b>Monitoring Information</b>	
Indicator: Structural Integrity of the Pipe	
Minimum Frequency: Emptied and degassed	
Averaging Period: n/a	
Deviation Limit: If the structural integrity of the fill pipe is in question, repairs shall be made before the storage vessel is refilled	
Basis of monitoring: The periodic monitoring option provided for emission units using a submerged fill pipe is location of the submerged fill pipe and structural integrity of the pipe. The location and the integrity of the pipe ensure that loading operations are controlled to prevent splash fill and reduce generated vapors; therefore, less emissions are released to the atmosphere. This approach was included as an option by the EPA in the "Periodic Monitoring Technical Reference Document" (April 1999) to monitor VOC sources.	

<b>Unit/Group/Process Information</b>	
ID No.: VE-025-0	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-01
Pollutant: VOC	Main Standard: § 115.112(e)(1)
<b>Monitoring Information</b>	
Indicator: Liquid Level	
Minimum Frequency: At the end of each unloading operation	
Averaging Period: n/a	
Deviation Limit: Liquid level falls below level of submerged fill pipe	
<p>Basis of monitoring:  The periodic monitoring option provided for emission units using a submerged fill pipe is location of the submerged fill pipe and structural integrity of the pipe. The location and the integrity of the pipe ensure that loading operations are controlled to prevent splash fill and reduce generated vapors; therefore, less emissions are released to the atmosphere. This approach was included as an option by the EPA in the "Periodic Monitoring Technical Reference Document" (April 1999) to monitor VOC sources.</p>	

<b>Unit/Group/Process Information</b>	
ID No.: VE-026-0	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-01
Pollutant: VOC	Main Standard: § 115.112(e)(1)
<b>Monitoring Information</b>	
Indicator: Structural Integrity of the Pipe	
Minimum Frequency: Emptied and degassed	
Averaging Period: n/a	
Deviation Limit: If the structural integrity of the fill pipe is in question, repairs shall be made before the storage vessel is refilled	
<p>Basis of monitoring:  The periodic monitoring option provided for emission units using a submerged fill pipe is location of the submerged fill pipe and structural integrity of the pipe. The location and the integrity of the pipe ensure that loading operations are controlled to prevent splash fill and reduce generated vapors; therefore, less emissions are released to the atmosphere. This approach was included as an option by the EPA in the "Periodic Monitoring Technical Reference Document" (April 1999) to monitor VOC sources.</p>	

<b>Unit/Group/Process Information</b>	
ID No.: VE-026-0	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-01
Pollutant: VOC	Main Standard: § 115.112(e)(1)
<b>Monitoring Information</b>	
Indicator: Liquid Level	
Minimum Frequency: At the end of each unloading operation	
Averaging Period: n/a	
Deviation Limit: Liquid level falls below the level of the submerged fill pipe	
<p>Basis of monitoring:  The periodic monitoring option provided for emission units using a submerged fill pipe is location of the submerged fill pipe and structural integrity of the pipe. The location and the integrity of the pipe ensure that loading operations are controlled to prevent splash fill and reduce generated vapors; therefore, less emissions are released to the atmosphere. This approach was included as an option by the EPA in the "Periodic Monitoring Technical Reference Document" (April 1999) to monitor VOC sources.</p>	

<b>Unit/Group/Process Information</b>	
ID No.: VE-041-0	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-01
Pollutant: VOC	Main Standard: § 115.112(e)(1)
<b>Monitoring Information</b>	
Indicator: Structural Integrity of the Pipe	
Minimum Frequency: Emptied and degassed	
Averaging Period: n/a	
Deviation Limit: Inspect to determine the structural integrity of the fill pipe and record each time the storage vessel is emptied and degassed to ensure that it continues to meet the specifications in the above requirement. If the structural integrity of the *****	
<p>Basis of monitoring:  The periodic monitoring option provided for emission units using a submerged fill pipe is location of the submerged fill pipe and structural integrity of the pipe. The location and the integrity of the pipe ensure that loading operations are controlled to prevent splash fill and reduce generated vapors; therefore, less emissions are released to the atmosphere. This approach was included as an option by the EPA in the “Periodic Monitoring Technical Reference Document” (April 1999) to monitor VOC sources.</p>	

<b>Unit/Group/Process Information</b>	
ID No.: VE-041-0	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-01
Pollutant: VOC	Main Standard: § 115.112(e)(1)
<b>Monitoring Information</b>	
Indicator: Record of Tank Construction Specifications	
Minimum Frequency: n/a	
Averaging Period: n/a	
Deviation Limit: Keep a record of tank construction specs that show a fill pipe that extends from the top of a tank to have a max clearance of 6 inches from the bottom or, when the tank is loaded from the side, a discharge opening entirely submerged when the pipe ***	
<p>Basis of monitoring:  The periodic monitoring option provided for emission units using a submerged fill pipe is location of the submerged fill pipe and structural integrity of the pipe. The location and the integrity of the pipe ensure that loading operations are controlled to prevent splash fill and reduce generated vapors; therefore, less emissions are released to the atmosphere. This approach was included as an option by the EPA in the "Periodic Monitoring Technical Reference Document" (April 1999) to monitor VOC sources.</p>	

## Compliance Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on December 15, 2015.

Site rating: 5.69 / Satisfactory Company rating: 4.96 / Satisfactory

(High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55)

2. Has the permit changed on the basis of the compliance history or site/company rating? .....No

## Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS? .....Yes

2. Is a compliance plan and schedule included in the permit?.....Yes

### Permit reviewer notes:

A compliance plan and schedule was included in the permit for emission units 1796-19A and 1796-19B. These units had discrepancies between the test information and the permit authorizations. The application will amend the permit application to correct this. The compliance schedule was sent to the regional office and approved.

## 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