

# Statement of Basis of the Federal Operating Permit

OCI Beaumont LLC

Site Name: OCI Beaumont  
Physical Location: 5470 Twin City Highway  
Nearest City: Nederland  
County: Jefferson

Permit Number: O1645  
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: September 29, 2015

## Operating Permit Basis of Determination

### Permit Area Process Description

The processes include: methanol reforming, methanol synthesis, methanol and ammonia interaction and the ammonia plant. The methanol manufacturing process begins with natural gas. Natural gas (methane) is passed through nickel molybdate/zinc oxide bed to desulfurize the natural gas. This forms hydrogen, carbon monoxide and carbon dioxide. The heat generated in the reformer is also used to produce steam for use in the plant. Emissions from fuel combustion are emitted through the reformer stacks. The process gas leaving the reformer is then cooled and combined with by-product carbon dioxide. The combined gases are cooled, compressed in the process gas compressor and sent to the synthesis section as make-up gas.

The synthesis of methanol occurs in two vessels, called methanol reactors, in the presence of a copper based catalyst. The synthesis gas is a mixture of recycle gas from the methanol reactor circulation loop and fresh makeup gas from the primary reformer. When the ammonia plant is not operating, the purge gas is routed to the primary reformer fuel gas system and burned as supplementary fuel gas. The methanol product shore tanks vent to a water scrubber system. The shore tank scrubber operates intermittently as necessary to control shore tank venting. The effluent from the scrubber is returned to the refining process.

### FOPs at Site

The “application area” consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: None

### Major Source Pollutants

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

Major Pollutants	VOC, NO <sub>x</sub> , HAPs, CO, GHG
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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
- Appendix B
  - Copies of major NSR authorizations

### 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.

## Appendix B

Copies of major NSR authorizations applicable to the units covered by this permit have been included in this Appendix, to ensure that all interested persons can access those authorizations.

**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.

**Stationary Vents subject to 30 TAC Chapter 111 not addressed in the Special Terms and Conditions**

All other stationary vents subject to 30 TAC Chapter 111 not covered in the Special Terms and Conditions are listed in the permit’s Applicable Requirement Summary. The basis for the applicability determinations for these vents are listed in the Determination of Applicable Requirements table.

**Federal Regulatory Applicability Determinations**

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

<b>Regulatory Program</b>	<b>Applicability (Yes/No)</b>
Prevention of Significant Deterioration (PSD)	Yes
Nonattainment New Source Review (NNSR)	No

Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	No
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*	Changes and Exceptions to DSS**
MET-PMP274	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-1	<p>HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.</p> <p>Brake HP = Stationary RICE with a brake hp greater than or equal to 250 hp and less than 300 hp.</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.</p> <p>Service Type = Emergency use where the RICE does not operate or is not contractually obligated to be available for more than 15 hours per calendar year as specified in 40 CFR §63.6640(f)(2)(ii)-(iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii).</p> <p>Stationary RICE Type = Compression ignition engine</p>	None
CRTK	30 TAC Chapter 115, Storage of VOCs	115TK-5	<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 and vapor recovery system</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> <p>Control Device Type = Other vapor recovery unit</p>	<p><u>Standard</u> - § 115.112(a), § 115.112(a)(1), § 115.112(a)(3) were added for the control of VOC from an external roof or internal roof storage tank.</p> <p><u>Monitoring/Testing</u> - § 115.1115(a), § 115.1115(a)(6), § 115.116(a), § 115.116(a)(1), § 115.117, § 115.117(1), § 115.117(2), § 115.117(5), § 115.117(6), § 115.117(8), § 115.117(11), § 115.117(12), § 115.118(a)(5), § 115.118(a)(7) were added as monitoring/testing requirements and approved test methods for a vapor control system</p> <p><u>Recordkeeping</u> - § 115.118(a), § 115.118(a)(4), § 115.118(a)(4)(F), § 115.118(a)(5) were added as record keeping requirements specific to the application area</p>
CRTK	40 CFR Part 63, Subpart G	63G-TK4	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>Closed Vent System = Closed vent system is routing emissions to a process or fuel gas system, or is subject to § 63.148 of Subpart G</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>Hard Piping = The closed vent system is constructed of hard piping.</p> <p>Bypass Lines = Closed vent system has by-pass lines that are sealed with a carseal or lock and key mechanism</p> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Control Device Type = Control device other than a flare, thermal incinerator, boiler, process heater, enclosed combustion device meeting residence time and temperature requirements, carbon adsorber, condenser or hazardous waste incinerator.</p> <p>Emission Control Type = Closed vent system (CVS) and control device (fixed roof)</p> <p>Control Device Design = The control device was not installed on or before December 31, 1992 or was not designed to reduce inlet emissions of total organic hazardous air pollutants by greater than or equal to 90% and less than 95%.</p> <p>Design Evaluation Submitted = A design evaluation of the emission control system was submitted to demonstrate compliance with 40 CFR § 63.119(e).</p>	<p><u>Related Standard</u> - [G]§63.148(d), §63.148(e) were deleted because they are included in the Special Terms and Conditions</p> <p><u>Monitoring/Testing</u> - §63.148(b)(1), [G]§63.148(c), §63.148(f)(2), §63.148(f)(3), [G]§63.148(g), [G]§63.148(h), were deleted because they are included in the Special Terms and Conditions</p> <p><u>Recordkeeping</u> - [G]§63.148(g), [G]§63.148(h), §63.148(i)(1) §63.148(i)(2), §63.148(i)(3)(ii), [G]§63.148(i)(4), §63.148(i)(5), §63.148(i)(6), §63.152(a), §63.152(a)(1), §63.152(a)(3), §63.152(a)(4), §63.152(a)(5), were deleted because they are included in the Special Terms and Conditions</p> <p><u>Reporting</u> - [G]§63.148(j), §63.151(a)(7), [G]§63.151(b) [G]§63.151(j), §63.152(a)(1), §63.152(a)(3), §63.152(a)(4), §63.152(a)(5), §63.152(b), [G]§63.152(b)(1), [G]§63.152(b)(2), §63.152(b)(4), §63.152(c)(1), [G]§63.152(c)(2), §63.152(c)(4)(ii), [G]§63.152(c)(6) were deleted because they are included in the Special Terms and Conditions</p>

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
CRTK	40 CFR Part 63, Subpart G	63G-TK5	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>Closed Vent System = Closed vent system is routing emissions to a process or fuel gas system, or is subject to § 63.148 of Subpart G</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>Hard Piping = The closed vent system is constructed of hard piping.</p> <p>Bypass Lines = Closed vent system has by-pass lines that are sealed with a carseal or lock and key mechanism</p> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Emission Control Type = Emissions routed to a process</p>	None
MET-TFL50	30 TAC Chapter 115, Storage of VOCs	115TK-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank 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>	<p><u>Related Standard</u> – §115.112(a)(2)(D) was deleted because the internal floating roof (IFR) does not have a roof drain</p> <p><u>Monitoring/Testing</u> - §115.117(1), §115.117(2), §115.117(5), §115.117(6), §115.117(7), §115.117(11), §115.117(12), were deleted because these test methods do not apply</p>
MET-TFL50	40 CFR Part 63, Subpart G	63G-TK1	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>Seal Type = Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the floating roof</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Emission Control Type = Internal floating roof</p>	<p><u>Recordkeeping</u> - §63.152(a)(1), §63.152(a)(3), §63.152(a)(4), §63.152(a)(5) were deleted because they are included in the special terms and conditions</p> <p><u>Reporting</u> – §63.151(a)(7), [G]§63.151(b), [G]§63.151(j), §63.152(a)(1), §63.152(a)(3), §63.152(a)(4), §63.152(a)(5), §63.152(b), [G]§63.152(b)(1), [G]§63.152(b)(4) were deleted because they are included in the special terms and conditions</p>
MET-TFX46	30 TAC Chapter 115, Storage of VOCs	115TK-2	<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>	<p><u>Monitoring/Testing</u> - §115.117(2), §115.117(5), §115.117(6), §115.117(11), §115.117(12), were deleted because these test methods do not apply</p>
MET-TFX46	40 CFR Part 63, Subpart G	63G-TK5	<p>MACT Subpart F/G Applicability = The unit is a Group 2 vessel.</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.</p>	None

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
TFX-33	30 TAC Chapter 115, Storage of VOCs	115TK-3	<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 and vapor recovery system</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> <p>Control Device Type = Other vapor recovery unit</p>	<p><u>Monitoring/Testing</u> – [G]§115.117 was added</p> <p><u>Monitoring/Testing</u> – §115.117(1), §115.117(2), §115.117(5), §115.117(6), §115.117(8), §115.117(11), §115.117(12) were deleted because of the group notation above</p>
TFX-33	40 CFR Part 63, Subpart G	63G-TK2	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>Closed Vent System = Closed vent system is routing emissions to a process or fuel gas system, or is subject to § 63.148 of Subpart G</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>Hard Piping = The closed vent system is constructed of hard piping.</p> <p>Bypass Lines = Closed vent system has by-pass lines that are sealed with a carseal or lock and key mechanism</p> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Control Device Type = Control device other than a flare, thermal incinerator, boiler, process heater, enclosed combustion device meeting residence time and temperature requirements, carbon adsorber, condenser or hazardous waste incinerator.</p> <p>Emission Control Type = Closed vent system (CVS) and control device (fixed roof)</p> <p>Control Device Design = The control device was not installed on or before December 31, 1992 or was not designed to reduce inlet emissions of total organic hazardous air pollutants by greater than or equal to 90% and less than 95%.</p> <p>Design Evaluation Submitted = A design evaluation of the emission control system was submitted to demonstrate compliance with 40 CFR § 63.119(e).</p>	<p><u>Related Standard</u> – §63.148(d), §63.148(d)(1), §63.148(d)(2) were added as leak inspection requirements for closed vent systems &amp; control device</p> <p><u>Related Standard</u> – [G]§63.148(d), §63.148(e) were deleted because they are not applicable</p> <p><u>Monitoring/Testing</u> – §63.148(b)(1)(ii), [G]§63.148(c) §63.148(f)(2), §63.148(g), §63.148(g)(2), §63.148(h), §63.148(h)(2) were deleted because they are not applicable</p> <p><u>Recordkeeping</u> – §63.148(g)(2), §63.148(h)(2) §63.148(i)(1), §63.148(i)(2), §63.148(i)(3)(ii), [G]§63.148(i)(4), §63.148(i)(5), §63.148(i)(6), [G]§63.152(a) were deleted because they are not applicable</p> <p><u>Reporting</u> – [G]§63.152(c)(6) was added.</p> <p><u>Reporting</u> – §63.148(j), §63.148(j)(3), §63.151(a)(7), [G]§63.151(b), [G]§63.151(j), [G]§63.152(a), §63.152(b), [G]§63.152(b)(1), §63.152(b)(4) were deleted because they are not applicable</p>
TFX-34	30 TAC Chapter 115, Storage of VOCs	115TK-4	<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 and vapor recovery system</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> <p>Control Device Type = Other vapor recovery unit</p>	<p><u>Monitoring/Testing</u> – [G]§115.117 was added</p> <p><u>Monitoring/Testing</u> – §115.117(1), §115.117(2), §115.117(5), §115.117(6), §115.117(8), §115.117(11), §115.117(12) were deleted because of the group notation above</p>
TFX-34	40 CFR Part 63, Subpart G	63G-TK3	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>Closed Vent System = Closed vent system is routing emissions to a process or fuel gas system, or is subject to § 63.148 of Subpart G</p>	<p><u>Related Standard</u> – §63.148(d), §63.148(d)(1), §63.148(d)(2) were added as leak inspection requirements for closed vent systems &amp; control device</p> <p><u>Related Standard</u> – [G]§63.148(d), §63.148(e) were</p>

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>Hard Piping = The closed vent system is constructed of hard piping.</p> <p>Bypass Lines = Closed vent system has by-pass lines that are sealed with a carseal or lock and key mechanism</p> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Control Device Type = Control device other than a flare, thermal incinerator, boiler, process heater, enclosed combustion device meeting residence time and temperature requirements, carbon adsorber, condenser or hazardous waste incinerator.</p> <p>Emission Control Type = Closed vent system (CVS) and control device (fixed roof)</p> <p>Control Device Design = The control device was not installed on or before December 31, 1992 or was not designed to reduce inlet emissions of total organic hazardous air pollutants by greater than or equal to 90% and less than 95%.</p> <p>Design Evaluation Submitted = A design evaluation of the emission control system was submitted to demonstrate compliance with 40 CFR § 63.119(e).</p>	<p>deleted because they are not applicable</p> <p><u>Monitoring/Testing</u> – §63.148(b)(1)(ii), [G]§63.148(c) §63.148(f)(2), §63.148(g), §63.148(g)(2), §63.148(h), §63.148(h)(2) were deleted because they are not applicable</p> <p><u>Recordkeeping</u> – §63.148(g)(2), §63.148(h)(2) §63.148(i)(1), §63.148(i)(2), §63.148(i)(3)(ii), [G]§63.148(i)(4), §63.148(i)(5), §63.148(i)(6), [G]§63.152(a) were deleted because they are not applicable</p> <p><u>Reporting</u> – [G]§63.152(c)(6) was added.</p> <p><u>Reporting</u> – §63.148(j), §63.148(j)(3), §63.151(a)(7), [G]§63.151(b), [G]§63.151(j), [G]§63.152(a), §63.152(b), [G]§63.152(b)(1), §63.152(b)(4) were deleted because they are not applicable</p>
TVT3	30 TAC Chapter 115, Storage of VOCs	115TK-6	<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>	<p><u>Standard</u> - § 115.111(a) was added as an exemption for VOC storage tank with true vapor pressure &lt; 1.5 psia</p> <p><u>Monitoring/Testing</u> – [G] § 115.117 was deleted because it does not apply.</p> <p><u>Recordkeeping</u> § 115.118(a) was added as a requirement specific to the application area</p> <p><u>Recordkeeping</u> - § 115.118(a)(5) and § 115.118(a)(7) were deleted because they do not apply</p>
DOCK	40 CFR Part 63, Subpart Y	63Y-1	<p>CEMS = Continuous emissions monitoring system (CEMS) is not being used.</p> <p>Subpart Y Facility Type = New onshore loading terminal (located onshore or less than 0.5 miles from shore).</p> <p>Ballasting Operations = Operations other than or in addition to ballasting operations are performed at the facility.</p> <p>Vapor Balancing System = Emissions are not reduced by a vapor balancing system.</p> <p>Documenting Vapor Tightness = Electing to comply with the emissions reporting requirements in 40 CFR § 63.567(b)(5)(i).</p> <p>Vapor Pressure = Vapor pressure is greater than or equal to 10.3 kilopascals (1.5 psia) at standard conditions, 20° C and 760 mm Hg.</p> <p>Subpart BB Applicability = Marine vessel loading operations are not subject to and complying with 40 CFR Part 61, Subpart BB.</p> <p>Subpart Y Control Device Type = Flare.</p> <p>HAP Impurities Only = Marine vessel loading operations at loading berths transfer liquids containing organic hazardous air pollutants other than as impurities.</p> <p>Alternate Monitoring = Complying with the control device specific monitoring procedures in 40 CFR § 63.564.</p> <p>Alternate Test Procedure = Complying with the test procedures in 40 CFR § 63.565.</p>	<p><u>Related Standard</u> – [G]§63.563(a)(1), §63.563(a)(2), §63.563(a)(3), §63.563(a)(4)(iv) were deleted because they are included in the Special Terms and Conditions</p> <p><u>Monitoring/Testing</u> - §63.563(b), §63.563(b)(1), §63.564(b)(3), §63.563(b)(5), §63.563(b)(10), [G]§63.563(c), §63.564(a)(2) §63.564(a)(3), §63.564(a)(4), §63.564(b)(3), §63.564(c), §63.564(d), §63.564(f), §63.564(j), [G]§63.565(b), §63.565(c), §63.565(l) were deleted because they are included in the Special Terms and Conditions</p> <p><u>Recordkeeping</u> - §63.564(b)(3), §63.564(d), §63.564(f) §63.565(c), §63.565(l), §63.567(f), §63.567(g), §63.567(g)(2), §63.567(j)(2), §63.567(j)(4), [G]§63.567(k), were deleted because they are included in the Special Terms and Conditions</p> <p><u>Reporting</u> - §63.567(b)(5), §63.567(d), [G]§63.567(e), §63.567(f), §63.567(j)(3) were deleted because they are included in the Special Terms and Conditions</p>

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Vent Stream By-Pass = There are valves that could route displaced vapors to the atmosphere.</p> <p>Bypass Flow Indicator = Visual inspection of seal or closure mechanism.</p>	
GRPTVLOAD1	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-1	<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 = Loading and unloading.</p> <p>True Vapor Pressure = True vapor pressure less than 0.5 psia.</p>	None
GRPTVLOAD2	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-2	<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>	None
GRPTVLOAD3	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-3	<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 = Loading and unloading.</p> <p>True Vapor Pressure = True vapor pressure greater than or equal to 0.5 psia.</p> <p>Daily Throughput = Loading less than 20,000 gallons per day.</p>	None
MEOHTRK	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-4	<p>Chapter 115 Control Device Type = No control device.</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 = Not 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 = Loading greater than or equal to 20,000 gallons per day.</p>	None

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
MEOHTRK	40 CFR Part 63, Subpart G	63G-LD1	<p>Control Options = Vapor balance system.</p> <p>Transfer Rack Type = Group 1 transfer rack (as defined in 40 CFR § 63.111).</p> <p>Vapor Balancing System = A vapor balancing system is being used to reduce emissions of organic hazardous air pollutants.</p> <p>Bypass Lines = The vent system does not contain by-pass lines that could divert a vent stream flow away from the control device.</p> <p>Closed Vent System = Closed vent system is routing emissions to a process or fuel gas system or is subject to § 63.148 of Subpart G.</p> <p>Hard Piping = The closed vent system is constructed of hard piping.</p>	<p><u>Related Standard</u> – §63.126(b) was added as a requirement to reduce HAPs for Group 1 transfer rack using vapor balancing system</p> <p><u>Related Standard</u> – §63.126(e) was added as a loading requirement for Group 1 transfer rack</p> <p><u>Related Standard</u> – [G]§63.126(d)(3) was deleted because the vent stream is not halogenated</p> <p><u>Related Standard</u> – [G]§63.148(d), §63.148(e) were deleted because they are in the Special Terms and Conditions</p> <p><u>Monitoring/Testing</u> - §63.128(c), §63.128(c)(4) were added as exemption for Group 1 transfer rack performance test when using vapor balancing system</p> <p><u>Monitoring/Testing</u> - §63.148(b), §63.148(b)(1) were added as inspection requirements for vapor collection system or closed vent system</p> <p><u>Monitoring/Testing</u> – [G]§63.126(d)(3) was deleted because the vent stream is not halogenated</p> <p><u>Monitoring/Testing</u> - §63.148(b)(1)(ii), [G]§63.148(c), [G]§63.148(g), §63.148(g)(1), §63.148(g)(2), §63.148(h)(2), §63.152(g)(1)(i), [G]§63.152(g)(1)(ii), §63.152(g)(1)(iii), §63.152(g)(1)(iv), [G]§63.152(g)(1)(v) were deleted because they are in the Special Terms and Conditions</p> <p><u>Recordkeeping</u> - §63.129(a)(1) was deleted because the vent streams are not halogenated, the emissions are not routed to a fuel gas system, and a flare, scrubber or control device is not being used</p> <p><u>Recordkeeping</u> - §63.148(g)(2), §63.148(h)(2), §63.148(i)(1) §63.148(i)(2), [G]§63.148(i)(4), §63.148(i)(5), §63.148(i)(6), [G]§63.152(a), [G]§63.152(f), §63.152(g)(1), §63.152(g)(1)(i), [G]§63.152(g)(1)(ii), §63.152(g)(1)(iii), §63.152(g)(1)(iv), [G]§63.152(g)(1)(v), [G]§63.152(g)(1)(vi), §63.152(g)(2), §63.152(g)(2)(i), §63.152(g)(2)(ii), §63.152(g)(2)(iii) were deleted because they are in the Special Terms and Conditions</p> <p><u>Reporting</u> - §63.129(a)(2), §63.129(a)(3), §63.130(d)(1), §63.130(d)(2) were deleted because the vent streams are not halogenated, and a flare, scrubber or control device is not being used</p> <p><u>Reporting</u> - §63.148(j), [G]§63.151(b) [G]§63.151(j), [G]§63.152(a), §63.152(b), [G]§63.152(b)(1), [G]§63.152(b)(2), §63.152(c)(2)(i), [G]§63.152(c)(2)(ii), §63.152(c)(2)(iii), §63.152(c)(3), §63.152(c)(3)(i), §63.152(c)(3)(ii), §63.152(c)(6)[G], §63.152(g)(1), §63.152(g)(2)(i), §63.152(g)(2)(ii) were deleted because they are included in the Special Terms and Conditions</p>
HR401	30 TAC Chapter	117-4	Unit Type = Process heater	None

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
	117, Subchapter B		Maximum Rated Capacity = MRC is less than 40 MMBtu/hr. RACT Date Placed in Service = On or before November 15, 1992	
HR402	30 TAC Chapter 117, Subchapter B	117-5	Unit Type = Process heater Maximum Rated Capacity = MRC is less than 40 MMBtu/hr. RACT Date Placed in Service = On or before November 15, 1992	None
HTR324	30 TAC Chapter 117, Subchapter B	117-3	Unit Type = Process heater Maximum Rated Capacity = MRC is less than 40 MMBtu/hr. RACT Date Placed in Service = On or after the final compliance date specified in 30 TAC §§ 117.9000, 117.9010 or 117.9020(1). Functionally Identical Replacement = Unit is not a functionally identical replacement.	<u>Main Standard</u> - § 117.103(a)(1) was added as exemption for any new unit placed in service after November 15, 1992. <u>Reporting</u> - § 117.154(a), § 117.154(a)(5) were added as requirements specific to the application area
AMMFLARE	30 TAC Chapter 111, Visible Emissions	111FL-1	Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.	None
AMMFLARE	40 CFR Part 63, Subpart A	63A-1	Required Under 40 CFR Part 63 = Flare is not required by a Subpart under 40 CFR Part 63.	None
ATK2FLR	30 TAC Chapter 111, Visible Emissions	R111-F-1	Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions. Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.	None
FL-42	30 TAC Chapter 111, Visible Emissions	111FL-5	Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.	None
FLARE	30 TAC Chapter 111, Visible Emissions	111FL-2	Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.	None
FLARE	40 CFR Part 63, Subpart A	63A-2	Required Under 40 CFR Part 63 = Flare is not required by a Subpart under 40 CFR Part 63.	None
MVCS FLARE	30 TAC Chapter 111, Visible Emissions	111FL-4	Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.	None
MVCS FLARE	40 CFR Part 63, Subpart A	63A-4	Required Under 40 CFR Part 63 = Flare is required by a Subpart under 40 CFR Part 63. 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). Flare Assist Type = Air assisted	None
TKFLARE	30 TAC Chapter 111, Visible	111FL-3	Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. Emergency/Upset Conditions Only = Flare is used under conditions other than emergency	None

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
	Emissions		or upset conditions.	
TKFLARE	40 CFR Part 63, Subpart A	63A-3	Required Under 40 CFR Part 63 = Flare is not required by a Subpart under 40 CFR Part 63.	None
AFUG322	30 TAC Chapter 115, Pet. Refinery & Petrochemicals	115FUG-1	Title 30 TAC § 115.352 Applicable = Site is not a petroleum refinery, synthetic organic chemical, polymer resin or methyl tert-butyl ether manufacturing process nor a natural gas/gasoline processing operation as defined in 30 TAC 115.10.	None
AFUG322	40 CFR Part 63, Subpart H	63H-FUG1	EQUIPMENT TYPE = FUGITIVE UNIT DOES NOT CONTAIN EQUIPMENT LISTED IN 40 CFR § 63.160(A) WHICH IS OPERATED IN ORGANIC HAZARDOUS AIR POLLUTANT SERVICE	None
MET/PRC247	30 TAC Chapter 115, Pet. Refinery & Petrochemicals	115FUG-2	<p>Agitators = The fugitive unit does not contain agitators.</p> <p>Compressor Seals = The fugitive unit contains compressor seals.</p> <p>Flanges = The fugitive unit contains flanges.</p> <p>Open-ended Valves = The fugitive unit contains open-ended valves.</p> <p>Pressure Relief Valves = The fugitive unit contains pressure relief valves.</p> <p>Process Drains = The fugitive unit does not have process drains.</p> <p>Pump Seals = The fugitive unit contains pump seals.</p> <p>Rupture Disks = The fugitive unit has no pressure relief valves equipped with rupture disks.</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>Valves (other than pressure relief and open-ended) = The fugitive unit contains valves other than pressure relief valves or open-ended valves or lines.</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 compressor seals or no alternate has been requested.</p> <p>Instrumentation Systems = The fugitive unit has instrumentation systems, as defined in 40 CFR § 63.161, that meet 40 CFR § 63.169.</p> <p>Less Than 250 Components at Site = Fugitive unit not located at site with less than 250 fugitive components.</p> <p>Sampling Connection Systems = The fugitive unit has sampling connection systems, as defined in 40 CFR § 63.161, that meet 40 CFR § 63.169.</p> <p>Weight Percent VOC = All components contact a process fluid that contains greater than or equal to 10% VOC by weight.</p> <p>50% by Volume = Compressors are not in hydrogen service or are in hydrogen service and the hydrogen content cannot be reasonably expected to always exceed 50% by volume.</p> <p>Complying with § 115.352(1) = Valves are complying with § 115.352(1).</p> <p>Complying With § 115.352(1) = Open-ended valves and lines are complying with § 115.352(1).</p> <p>Complying with 30 TAC § 115.352(1) = Flanges are complying with the requirements in 30 TAC § 115.352(1).</p> <p>Reciprocating Compressors Or Positive Displacement Pumps = The fugitive unit does not</p>	<p><u>Pressure relief valves with TVP &gt; 0.044 psia:</u>  <u>Related Standard</u> – §115.352(2), §115.352(2)(A), §115.352(2)(B), §115.352(3), §115.352(5), §115.352(7), §115.357(2), §115.357(6), §115.357(8), §115.357(9) were added as repair standard (VOC leak prevention)  <u>Monitoring/Testing</u> - §115.354(1), §115.354(2), §115.354(4), §115.354(5), §115.354(6), §115.354(9), §115.354(10), [G]§115.355 were added as inspection and monitoring requirements  <u>Recordkeeping</u> - §115.354(10), [G]§115.356(1), [G]§115.356(2), [G]§115.356(3), §115.356(5) were added as recordkeeping requirements</p> <p><u>Open-ended valves or lines with TVP &lt; or = 0.044 psia:</u>  <u>Related Standard</u> – §115.352(2), §115.352(2)(A), §115.352(2)(B), §115.352(3), §115.352(5), §115.352(7), §115.357(6), §115.357(8), were added as repair standard (VOC leak prevention)  <u>Monitoring/Testing</u> - §115.354(1), §115.354(1)(B) §115.354(1)(C), §115.354(2), §115.354(5), §115.354(6), §115.354(9), [G]§115.355, §115.357(1) were added as inspection and monitoring requirements  <u>Recordkeeping</u> - §115.352(7), [G]§115.356(1), [G]§115.356(2), [G]§115.356(3), §115.356(5) were added as recordkeeping requirements</p> <p><u>Open-ended valves or lines with TVP &gt; 0.044 psia:</u>  <u>Related Standard</u> – §115.352(2), §115.352(2)(A), §115.352(2)(B), §115.352(3), §115.352(4), §115.352(5), §115.352(7), §115.352(9), §115.352(12), §115.357(8), were added as repair standard (VOC leak prevention)  <u>Monitoring/Testing</u> - §115.354(1), §115.354(2), §115.354(5), §115.354(6), §115.354(9), §115.354(10), [G]§115.355 were added as inspection and monitoring requirements  <u>Recordkeeping</u> - §115.352(7), §115.354(10), [G]§115.356(1), [G]§115.356(2), [G]§115.356(3), §115.356(5) were added as recordkeeping requirements</p>

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>have reciprocating compressors or positive displacement pumps used in natural gas/gasoline processing operations.</p> <p>Shaft Seal System = Pump seals are not equipped with a shaft seal system that prevents or detects emission of VOC from the seal.</p> <p>TVP 0.002 PSIA or Less = The fugitive unit has components or systems that contact a process fluid containing VOC having a true vapor pressure less than or equal to 0.002 psia at 68 degrees Fahrenheit.</p> <p>Shaft Seal System = Compressors are not equipped with a shaft sealing system that prevents or detects emission of VOC from the seal.</p> <p>TVP of Process Fluid VOC &lt;= 0.044 psia at 68° F = No pressure relief valves contact a process fluid with a TVP of less than or equal to 0.044 psia at 68° F.</p> <p>TVP of Process Fluid VOC &lt;= 0.044 psia at 68° F = Valves contact a process fluid with a TVP less than or equal to 0.044 psia at 68° F.</p> <p>TVP of Process Fluid VOC &lt;= 0.044 PSIA AT 68□° F = Flanges do not contact a process fluid containing VOC having a true vapor pressures less than or equal to 0.044 psia at 68 degrees Fahrenheit.</p> <p>TVP of Process Fluid VOC &lt;= 0.044 PSIA AT 68□° F = Pump seals contact a process fluid containing VOC having a true vapor 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 &lt;= 0.044 PSIA AT 68□° F = Compressor seals do not contact a process fluid containing VOC having a true vapor pressures less than or equal to 0.044 psia at 68 degrees Fahrenheit.</p> <p>TVP of Process Fluid VOC &gt; 0.044 psia at 68° F = Pressure relief valves contact a process fluid with a TVP &gt; 0.044 psia at 68° F.</p> <p>TVP of Process Fluid VOC &gt; 0.044 PSIA AT 68° F = Open-ended valves 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>	<p><u>Valves with TVP &lt; or = 0.044 psia:</u>  <u>Related Standard</u> – §115.352(2), §115.352(2)(A), §115.352(2)(B), §115.352(3), §115.352(4), §115.352(5), §115.352(6), §115.352(7), §115.357(1), §115.357(8), §115.357(9), were added as repair standard (VOC leak prevention)  <u>Monitoring/Testing</u> - §115.354(1), §115.354(1)(B) §115.354(1)(C), §115.354(2), §115.352(C), §115.354(9), [G]§115.355, §115.357(1) were added as inspection and monitoring requirements  <u>Recordkeeping</u> - §115.352(7), §115.354(10), [G]§115.356(1), [G]§115.356(2), [G]§115.356(3), §115.356(5) were added as recordkeeping requirements</p> <p><u>Valves with TVP &gt; 0.044 psia:</u>  <u>Related Standard</u> – §115.352(2), §115.352(2)(A), §115.352(2)(B), §115.352(3), §115.352(4), §115.352(5), §115.352(6), §115.352(7), §115.352(9), §115.357(8), §115.357(12) were added as repair standard (VOC leak prevention)  <u>Monitoring/Testing</u> - §115.354(1), §115.354(2), §115.354(5), §115.354(6), §115.354(9), §115.354(10), [G]§115.355 were added as inspection and monitoring requirements  <u>Recordkeeping</u> - §115.352(7), [G]§115.356(1), [G]§115.356(2), [G]§115.356(3), §115.356(5) were added as recordkeeping requirements</p> <p><u>Flanges with TVP &gt; 0.044 psia:</u>  <u>Related Standard</u> – §115.352(2), §115.352(2)(A), §115.352(3), §115.352(5), §115.352(7), §115.357(8), §115.357(12) were added as repair standard (VOC leak prevention)  <u>Monitoring/Testing</u> - §115.354(1), §115.354(1)(C), §115.354(3), §115.354(5), §115.354(6), §115.354(9), §115.354(10), §115.354(11), [G]§115.355 were added as inspection and monitoring requirements  <u>Recordkeeping</u> - §115.352(7), §115.354(10), [G]§115.356(1), [G]§115.356(2), §115.356(3), §115.356(3)(A), §115.356(3)(B) §115.356(5) were added as recordkeeping requirements</p> <p><u>Compressor seals with TVP &gt; 0.044 psia:</u>  <u>Related Standard</u> – §115.352(2), §115.352(2)(A), §115.352(3), §115.352(5), §115.352(7) were added as repair standard (VOC leak prevention)  <u>Monitoring/Testing</u> - §115.354(1), §115.354(1)(B), §115.354(1)(C), §115.354(2), §115.354(2)(A) §115.354(5), §115.354(6), §115.354(9), §115.354(10), [G]§115.355 were added as inspection and monitoring requirements  <u>Recordkeeping</u> - §115.352(7), §115.354(10), [G]§115.356(1), [G]§115.356(2), §115.356(3), §115.356(3)(A), §115.356(3)(B) §115.356(5) were</p>

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
				<p>added as recordkeeping requirements  <u>Pump seals with TVP &gt; 0.044 psia:</u>  <u>Related Standard</u> – §115.352(2), §115.352(2)(A), [G]§115.352(2)(C), §115.352(3), §115.352(5), §115.352(7) §115.357(6) were added as repair standard (VOC leak prevention)  <u>Monitoring/Testing</u> - §115.354(1), §115.354(1)(B), §115.354(1)(C), §115.354(2), §115.354(5), §115.354(6), §115.354(9), §115.354(10), [G]§115.355 were added as inspection and monitoring requirements  <u>Recordkeeping</u> - §115.352(7), §115.354(10), G]§115.356(1), [G]§115.356(2), §115.356(3), §115.356(3)(A), §115.356(3)(B) §115.356(5) were added as recordkeeping requirements</p>
MET/PRC247	40 CFR Part 63, Subpart H	63H-FUG2	<p>ANY (CLOSED VENT SYSTEMS) = COMPONENT PRESENT  ANY (OPEN-ENDED VALVES OR LINES) = COMPONENT PRESENT  BYPASS LINES = FUGITIVE UNIT CONTAINS ANY CLOSED-VENT SYSTEMS CONTAINING BY-PASS LINES THAT COULD DIVERT A VENT STREAM AWAY FROM THE CONTROL DEVICE AND TO THE ATMOSPHERE  ENCLOSED-VENTED PROCESS UNIT AMEL = UNIT DOES NOT CONTAIN A TOTALLY ENCLOSED VENTED PROCESS UNIT COMPLYING WITH AN ALTERNATE MEANS OF EMISSION LIMITATION IN § 63.179  EQUIPMENT TYPE = FUGITIVE UNIT CONTAINS EQUIPMENT LISTED IN 40 CFR § 63.160(A) WHICH IS OPERATED IN ORGANIC HAZARDOUS AIR POLLUTANT SERVICE  GAS/VAPOR OR LIGHT LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT  LIGHT LIQUID SERVICE (PUMPS) = COMPONENT PRESENT  HEAVY LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT  HEAVY LIQUID SERVICE (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT  HEAVY LIQUID SERVICE (PUMPS) = COMPONENT NOT PRESENT  NON RESEARCH AND DEVELOPMENT/BATCH PROCESSES = FUGITIVE UNIT CONTAINS PROCESSES OTHER THAN RESEARCH AND DEVELOPMENT FACILITIES AND BENCH-SCALE BATCH PROCESSES  RECOVERY OR RECAPTURE DEVICES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT  UNSAFE TO INSPECT = FUGITIVE UNIT CONTAINS ANY CLOSED-VENT SYSTEM WITH PARTS DESIGNATED AS UNSAFE TO INSPECT  ANY (INSTRUMENTATION SYSTEMS) = COMPONENT PRESENT  BATCH PROCESS AMEL = UNIT DOES NOT CONTAIN A BATCH PROCESS UNIT COMPLYING WITH AN ALTERNATE MEANS OF EMISSION LIMITATION IN § 63.178  DIFFICULT TO INSPECT = FUGITIVE UNIT CONTAINS ANY CLOSED-VENT SYSTEM WITH PARTS DESIGNATED AS DIFFICULT TO INSPECT  GAS/VAPOR OR LIGHT LIQUID SERVICE (VALVES) = COMPONENT PRESENT  QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR PUMPS</p>	<p><u>Standard</u> - § 63.165(a), [G]§ 63.165(b), § 63.165(c), § 63.166(a) § 63.166(b)(1), § 63.166(b)(2), § 63.166(c), [G]§ 63.174(a), § 63.174(b), § 63.174(b)(1), [G]§ 63.174(b)(3), [G]§ 63.174(c), § 63.174(d), [G]§ 63.174(f), [G]§ 63.174(g), [G]§ 63.174(h), § 63.174(i), § 63.174(i)(2), [G]§ 63.174(j) were added as standards for pressure relief devices in gas/vapor service, sampling connection systems, connectors in gas/vapor service and in light liquid service  <u>Monitoring/Testing</u> - §63.164(d), §[G]63.164(e), §63.164(f), §63.164(h) § 63.165(a), [G]§ 63.165(b), § 63.165(c), [G]§ 63.174(a), § 63.174(b), § 63.174(b)(1), [G]§ 63.174(b)(3), [G]§ 63.174(c), [G]§ 63.174(f), [G]§ 63.174(g), [G]§ 63.174(h), § 63.174(i) § 63.174(i)(2), [G]§ 63.174(j) were added as monitoring &amp; testing requirements for the fugitive components  <u>Recordkeeping</u> - §63.181(b), [G]§63.181(b)(1), §63.181(b)(1)(i), §63.181(b)(1)(iii), §63.181(b)(2)(i), §63.181(b)(2)(iii), §63.181(b)(3)(i), §63.181(b)(4), §63.181(d)(1), §63.181(d)(2), §63.181(d)(3), §63.181(d)(4), [G]§63.181(d)(5), §63.181(d)(6), §63.181(d)(9), [G]§63.182(b)(6) were added as recordkeeping requirements for the fugitive components  <u>Reporting</u> - §63.182(a), §63.182(a)(1), §63.182(a)(2), §63.182(a)(3), §63.182(b), [G]§63.182(b)(1), §63.182(b)(2), §63.182(b)(2)(i), §63.182(d), §63.182(d)(1), §63.182(d)(2), §63.182(d)(2)(v), §63.182(d)(2)(vi), §63.182(d)(2)(ix), §63.182(d)(2)(xi), §63.182(d)(2)(xiii), §63.182(d)(2)(xiv), §63.182(d)(2)(xvi), §63.182(d)(4) were added as reporting requirements for the fugitive components</p>

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>VACUUM SERVICE = NOT ALL OF THE EQUIPMENT IN THE FUGITIVE UNIT IS IN VACUUM SERVICE</p> <p>ANY (COMPRESSORS) = COMPONENT PRESENT</p> <p>ENCLOSED COMBUSTION DEVICES (CLOSED VENT SYSTEMS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (INSTRUMENTATION SYSTEMS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (VALVES) = COMPONENT NOT PRESENT</p> <p>LESS THAN 300 OPERATING HOURS = THE FUGITIVE UNIT CONTAINS ANY EQUIPMENT IN ORGANIC HAZARDOUS AIR POLLUTANT (HAP) SERVICE THAT IS INTENDED TO OPERATE LESS THAN 300 HOURS PER CALENDAR YEAR</p> <p>ANY (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT PRESENT</p> <p>GAS VAPOR SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE = NONE OF THE EQUIPMENT IN ORGANIC HAP SERVICE THAT IS INTENDED TO OPERATE LESS THAN 300 HOURS PER CALENDAR YEAR IS IN HEAVY LIQUID SERVICE</p> <p>QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR VALVES</p> <p>AMEL = FUGITIVE UNIT SOURCE OWNER/OPERATOR IS NOT ELECTING TO COMPLY WITH AN ALTERNATIVE MEANS OF EMISSION LIMITATION (AMEL)</p> <p>FLARES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (CONNECTORS) = COMPONENT PRESENT</p> <p>GENERAL AMEL = UNIT IS NOT COMPLYING WITH AN ALTERNATE MEANS OF EMISSION LIMITATION UNDER § 63.177</p> <p>HEAVY LIQUID SERVICE (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT</p> <p>LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (CONNECTORS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT</p> <p>ANY (SAMPLING CONNECTION SYSTEMS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (SAMPLING CONNECTION SYSTEMS) = COMPONENT NOT PRESENT</p> <p>UNITS WITHOUT AMEL = FUGITIVE UNIT EQUIPMENT OR PROCESS UNITS ARE NOT COMPLYING WITH AN ALTERNATE MEANS OF EMISSION LIMITATION.</p>	
MVCSFUG	30 TAC Chapter 115, Pet. Refinery & Petrochemicals	115FUG-3	<p>Agitators = The fugitive unit does not contain agitators.</p> <p>Compressor Seals = The fugitive unit does not contain compressor seals.</p> <p>Flanges = The fugitive unit contains flanges.</p> <p>Open-ended Valves = The fugitive unit contains open-ended valves.</p> <p>Pressure Relief Valves = The fugitive unit contains pressure relief valves.</p>	<p><u>Related Standard</u> – §115.357(12) was deleted because it is not in the rules and regulation</p> <p><u>Monitoring/Testing</u> – §115.354(1)(B), §115.354(1)(C), §115.354(2)(C) were added as requirements for difficult-to-monitor components, unsafe-to-monitor components &amp; accessible valves (VOC leak)</p> <p><u>Monitoring/Testing</u> – [G]§115.354(7) deleted because they are not applicable</p>

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Process Drains = The fugitive unit does not have process drains.</p> <p>Pump Seals = The fugitive unit does not contain pump seals.</p> <p>Rupture Disks = The fugitive unit has no pressure relief valves equipped with rupture disks.</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>Valves (other than pressure relief and open-ended) = The fugitive unit contains valves other than pressure relief valves or open-ended valves or lines.</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 valves or no alternate has been requested.</p> <p>Instrumentation Systems = The fugitive unit has instrumentation systems, as defined in 40 CFR § 63.161, that meet 40 CFR § 63.169.</p> <p>Less Than 250 Components at Site = Fugitive unit not located at site with less than 250 fugitive components.</p> <p>Sampling Connection Systems = The fugitive unit has sampling connection systems, as defined in 40 CFR § 63.161, that meet 40 CFR § 63.169.</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 § 115.352(1) = Valves are complying with § 115.352(1).</p> <p>Complying With § 115.352(1) = Open-ended valves and lines are complying with § 115.352(1).</p> <p>Complying with 30 TAC § 115.352(1) = Flanges are complying with the requirements in 30 TAC § 115.352(1).</p> <p>Reciprocating Compressors Or Positive Displacement Pumps = The fugitive unit does not have reciprocating compressors or positive displacement pumps used in natural gas/gasoline processing operations.</p> <p>TVP 0.002 PSIA or Less = The fugitive unit does not have components or systems that contact a process fluid containing VOC having a true vapor pressure less than or equal to 0.002 psia at 68 degrees Fahrenheit.</p> <p>TVP of Process Fluid VOC &lt;= 0.044 psia at 68° F = No pressure relief valves contact a process fluid with a TVP of less than or equal to 0.044 psia at 68° F.</p> <p>TVP of Process Fluid VOC &lt;= 0.044 PSIA AT 68□° F = Open-ended valves or lines do not contact a process fluid containing VOC having a true vapor pressures less than or equal to 0.044 psia at 68 degrees Fahrenheit.</p> <p>TVP of Process Fluid VOC &gt; 0.044 psia at 68° F = Pressure relief valves contact a process fluid with a TVP &gt; 0.044 psia at 68° F.</p> <p>TVP of Process Fluid VOC &gt; 0.044 PSIA AT 68° F = Open-ended valves contact a process fluid containing VOC having a TVP greater than 0.044 psia at 68 degrees Fahrenheit.</p>	<p><u>Recordkeeping</u> – [G]§115.356(3) was added as a requirement for valves</p> <p><u>Recordkeeping</u> – §115.356, §115.356(3), §115.356(3)(A), §115.356(3)(B), [G]§115.356(3)(C) were deleted because of the group notation above</p> <p><u>Reporting</u> – [G]§115.354(7) deleted because it is not applicable</p>
MVCSFUG	40 CFR Part 63, Subpart H	63H-FUG3	<p>ANY (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>ANY (OPEN-ENDED VALVES OR LINES) = COMPONENT PRESENT</p> <p>BYPASS LINES = FUGITIVE UNIT WITH A CLOSED-VENT SYSTEM DOES NOT</p>	<p><u>Sampling connection systems</u> : <u>Related Standard</u> – §63.166(b)(1), §63.166(b)(2) were added as standards for sampling connection systems with purges</p>

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>CONTAIN A BY-PASS LINE THAT COULD DIVERT A VENT STREAM AWAY FROM THE CONTROL DEVICE AND TO THE ATMOSPHERE</p> <p>ENCLOSED-VENTED PROCESS UNIT AMEL = UNIT DOES NOT CONTAIN A TOTALLY ENCLOSED VENTED PROCESS UNIT COMPLYING WITH AN ALTERNATE MEANS OF EMISSION LIMITATION IN § 63.179</p> <p>EQUIPMENT TYPE = FUGITIVE UNIT CONTAINS EQUIPMENT LISTED IN 40 CFR § 63.160(A) WHICH IS OPERATED IN ORGANIC HAZARDOUS AIR POLLUTANT SERVICE</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>LIGHT LIQUID SERVICE (PUMPS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (PUMPS) = COMPONENT NOT PRESENT</p> <p>NON RESEARCH AND DEVELOPMENT/BATCH PROCESSES = FUGITIVE UNIT CONTAINS PROCESSES OTHER THAN RESEARCH AND DEVELOPMENT FACILITIES AND BENCH-SCALE BATCH PROCESSES</p> <p>RECOVERY OR RECAPTURE DEVICES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>UNSAFE TO INSPECT = FUGITIVE UNIT CONTAINS ANY CLOSED-VENT SYSTEM WITH PARTS DESIGNATED AS UNSAFE TO INSPECT</p> <p>ANY (INSTRUMENTATION SYSTEMS) = COMPONENT PRESENT</p> <p>BATCH PROCESS AMEL = UNIT DOES NOT CONTAIN A BATCH PROCESS UNIT COMPLYING WITH AN ALTERNATE MEANS OF EMISSION LIMITATION IN § 63.178</p> <p>DIFFICULT TO INSPECT = FUGITIVE UNIT CONTAINS ANY CLOSED-VENT SYSTEM WITH PARTS DESIGNATED AS DIFFICULT TO INSPECT</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (VALVES) = COMPONENT PRESENT</p> <p>VACUUM SERVICE = NOT ALL OF THE EQUIPMENT IN THE FUGITIVE UNIT IS IN VACUUM SERVICE</p> <p>ANY (COMPRESSORS) = COMPONENT NOT PRESENT</p> <p>ENCLOSED COMBUSTION DEVICES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (INSTRUMENTATION SYSTEMS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (VALVES) = COMPONENT NOT PRESENT</p> <p>LESS THAN 300 OPERATING HOURS = THE FUGITIVE UNIT DOES NOT CONTAIN ANY EQUIPMENT IN ORGANIC HAZARDOUS AIR POLLUTANT (HAP) SERVICE THAT IS INTENDED TO OPERATE LESS THAN 300 HOURS PER CALENDAR YEAR</p> <p>ANY (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT</p> <p>GAS VAPOR SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE = NONE OF THE EQUIPMENT IN ORGANIC HAP SERVICE THAT IS INTENDED TO OPERATE LESS THAN 300 HOURS PER CALENDAR YEAR IS IN HEAVY LIQUID SERVICE</p>	<p><u>Related Standard</u> – §63.166(c) was added as standard for sampling connection systems without purges</p> <p><u>Recordkeeping</u> – §63.181(b)(1), §63.181(b)(1)(i), §63.181(b)(1)(iii) were added as a requirements for sampling connectors</p> <p><u>Recordkeeping</u> – §63.181(c) was deleted because it is not applicable</p> <p><u>Reporting</u> – §63.182(a), §63.182(a)(1), §63.182(a)(2), §63.182(a)(3), §63.182(d)(1), §63.182(d)(4) were added as requirements for sampling connectors</p> <p><u>Reporting</u> – [G]§63.182(a)(3), [G]§63.182(d) were deleted because they are not applicable</p> <p><u>Connectors in gas/vapor service &amp; in light liquid service:</u></p> <p><u>Recordkeeping</u> – §63.181(d) was added as a requirement for connectors in gas/vapor service &amp; in light liquid service (leak detection &amp; repair)</p> <p><u>Open-ended valves or lines:</u></p> <p><u>Recordkeeping</u> – §63.181(b), §63.181(b)(1) were added as a requirements for open-ended valves or lines</p> <p><u>Recordkeeping</u> – [G]§63.181(b) was deleted because it is not applicable</p>

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR VALVES</p> <p>AMEL = FUGITIVE UNIT SOURCE OWNER/OPERATOR IS NOT ELECTING TO COMPLY WITH AN ALTERNATIVE MEANS OF EMISSION LIMITATION (AMEL)</p> <p>FLARES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (CONNECTORS) = COMPONENT PRESENT</p> <p>GENERAL AMEL = UNIT IS NOT COMPLYING WITH AN ALTERNATE MEANS OF EMISSION LIMITATION UNDER § 63.177</p> <p>LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (CONNECTORS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT</p> <p>ANY (SAMPLING CONNECTION SYSTEMS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (SAMPLING CONNECTION SYSTEMS) = COMPONENT NOT PRESENT</p> <p>UNITS WITHOUT AMEL = FUGITIVE UNIT EQUIPMENT OR PROCESS UNITS ARE NOT COMPLYING WITH AN ALTERNATE MEANS OF EMISSION LIMITATION.</p>	
OWS325	30 TAC Chapter 115, Water Separation	115WS-1	<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>	<p><u>Related Standard</u> – §115.137(a)(2) was added as an exemption for VOC water separator</p> <p><u>Monitoring/Testing</u> – §115.135(a)(5) was added for the determination of TVP at actual storage temperature</p> <p><u>Monitoring/Testing</u> – [G]§115.135(a)(5) was deleted because it is not applicable</p>
GRPMETPR	30 TAC Chapter 115, Vent Gas Controls	R5121-1	<p>Alternate Control Requirement = Alternate control is not used.</p> <p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Control Device Type = Direct flame incinerator in which the vent gas stream is burned at a temperature or at least 1300° F (704 C).</p> <p>Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.</p>	None
HR401	30 TAC Chapter 111, Visible Emissions	R1111-2	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p>	<p><u>Related Standard</u> – §111.111(a)(1)(G) was added as a requirement for opacity readers.</p>

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Construction Date = On or before January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.</p>	
HR402	30 TAC Chapter 111, Visible Emissions	R1111-3	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = On or before January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.</p>	<p><u>Related Standard</u> – §111.111(a)(1)(G) was added as a requirement for opacity readers.</p>
HTR-324	30 TAC Chapter 111, Visible Emissions	111-3	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = On or before January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.</p>	<p><u>Related Standard</u> – §111.111(a)(1)(G) was added as a requirement for opacity readers.</p>
MET-COM48	30 TAC Chapter 111, Visible Emissions	111-6	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is from colorless VOCs, non-fuming liquids, or other sources that are not capable of producing visible emissions. Periodic monitoring to demonstrate compliance is not required.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = On or before January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.</p>	None
MET-STK44	30 TAC Chapter 111, Visible Emissions	111-1	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is from colorless VOCs, non-fuming liquids, or other sources that are not capable of producing visible emissions. Periodic monitoring to demonstrate compliance is not required.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p>	None

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Construction Date = On or before January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.</p>	
STK-41	30 TAC Chapter 111, Visible Emissions	111-2	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = After January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is at least 100,000 actual cubic feet per minute.</p>	<p><u>Related Standard</u> – §111.111(a)(1)(G) was added as a requirement for opacity readers.</p>
MET/PRC246	40 CFR Part 63, Subpart F	63F-2	<p>Applicable Chemicals = The chemical manufacturing process unit manufactures, as a primary product, one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or 40 CFR § 63.100(b)(1)(ii).</p> <p>Intervening Cooling Fluid = There is no intervening cooling fluid containing less than 5 percent by weight of total HAPs listed in Table 4 of 40 CFR Part 63, Subpart F, between the process and cooling water.</p> <p>Table 2 HAP = The chemical manufacturing process unit uses as a reactant or manufactures, as a product or co-product, one or more of the organic hazardous air pollutants in Table 2.</p> <p>Table 4 HAP Content = The recirculating heat exchange system is used exclusively to cool process fluids that contain less than 5 percent by weight of total HAPs listed in Table 4 of title 40 CFR Part 63, Subpart F.</p> <p>Alternate Means of Emission Limitation = No alternative means of emission limitation has been approved by the EPA Administrator to achieve a reduction in organic HAP emission or no alternate has been requested.</p> <p>Heat Exchange System = A heat exchange system is utilized.</p> <p>Cooling Water Pressure = The heat exchange system is not operated with the minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side.</p>	<p><u>Main Standard</u> – §63.104(a) was added as standard for cooling tower or heat exchange system</p> <p><u>Main Standard</u> – §63.100(b) was deleted because it is a wastewater rule in the special terms and conditions</p> <p><u>Related Standard</u> – §63.104(d), §63.104(e) were added as repair standard for leak detection in heat exchange system</p> <p><u>Related Standard</u> – §63.102(a), §63.102(c), §63.105(d) were deleted because they are wastewater requirements in the special terms and conditions</p> <p><u>Monitoring/Testing</u> - §63.104(b), §63.104(b)(1), §63.104(b)(2)(i), §63.104(b)(3), §63.104(b)(4), §63.104(b)(4)(i), §63.104(b)(4)(iii), §63.104(b)(5), §63.104(b)(6) were added as monitoring requirements for cooling towers</p> <p><u>Monitoring/Testing</u> - §63.103(b)(1), §63.103(b)(3), §63.104(b)(4), [G]§63.103(b)(5), §63.103(b)(6) §63.104(b)(4)(i), §63.104(b)(4)(iii), §63.104(b)(5), §63.104(b)(6) were deleted because they are wastewater requirements included in the special terms and conditions</p> <p><u>Recordkeeping</u> – [G]§63.104(e)(2), [G]§63.104(f)(1) were added as recordkeeping requirements for cooling towers</p> <p><u>Recordkeeping</u> – [G]§63.103(e), [G]§63.105(b), §63.105(c), §63.105(e) were deleted because they are wastewater requirements included in the special terms and conditions</p> <p><u>Reporting</u> – [G]§63.104(f)(2) was added as reporting requirement for cooling towers</p> <p><u>Reporting</u> - §§63.103(b)(2), [G]§63.103(b)(5), [G]§63.103(d) were deleted because they are wastewater requirements included in the special terms and conditions</p>
PRO-MEOH	40 CFR Part 63,	63F-1	Applicable Chemicals = The chemical manufacturing process unit manufactures, as a	None

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
	Subpart F		<p>primary product, one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or 40 CFR § 63.100(b)(1)(ii).</p> <p>Intervening Cooling Fluid = There is no intervening cooling fluid containing less than 5 percent by weight of total HAPs listed in Table 4 of 40 CFR Part 63, Subpart F, between the process and cooling water.</p> <p>Table 2 HAP = The chemical manufacturing process unit uses as a reactant or manufactures, as a product or co-product, one or more of the organic hazardous air pollutants in Table 2.</p> <p>Table 4 HAP Content = The recirculating heat exchange system is not used exclusively to cool process fluids that contain less than 5 percent by weight of total HAPs listed in Table 4 of title 40 CFR Part 63, Subpart F.</p> <p>Alternate Means of Emission Limitation = No alternative means of emission limitation has been approved by the EPA Administrator to achieve a reduction in organic HAP emission or no alternate has been requested.</p> <p>NPDES Permit = The once-through heat exchange system is not subject to NPDES permit with an allowable discharge limit of 1 part per million or less above influent concentration or 10 percent or less above influent concentration.</p> <p>Meets 40 CFR 63.104(a)(4)(i)-(iv) = The once-through heat exchange system is not subject to an NPDES permit that meets 40 CFR § 63.104(a)(4)(i) - (iv).</p> <p>Heat Exchange System = No heat exchange system is utilized.</p> <p>Table 9 HAP Content = The once-through heat exchange system is not used exclusively to cool process fluids that contain less than 5 percent by weight of total HAPs listed in Table 9 of 40 CFR Part 63, Subpart G.</p> <p>Cooling Water Monitored = The cooling water is being monitored for the presence of one or more HAPs or other representative substances whose presence in cooling water indicates a leak.</p>	

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

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

## NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

## New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. The following table specifies the permits by rule that apply to the site. All current permits by rule are contained in Chapter 106. Outdated 30 TAC Chapter 106 permits by rule may be viewed at the following Web site:

[www.tceq.texas.gov/permitting/air/permitbyrule/historical\\_rules/old106list/index106.html](http://www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html)

Outdated Standard Exemption lists may be viewed at the following Web site:

[www.tceq.texas.gov/permitting/air/permitbyrule/historical\\_rules/oldselist/se\\_index.html](http://www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html)

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>Prevention of Significant Deterioration (PSD) Permits</b>	
PSD Permit No.: PSDTX1334	Issuance Date: 03/20/2015
PSD Permit No.: PSDTX1334GHG	Issuance Date: 08/01/2014
<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.: 901	Issuance Date: 03/20/2015
<b>Permits By Rule (30 TAC Chapter 106) for the Application Area</b>	
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.371	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: 106.492	Version No./Date: 09/04/2000
Number: 106.532	Version No./Date: 09/04/2000
Number: 51	Version No./Date: 06/07/1996
Number: 61	Version No./Date: 06/07/1996

## 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 sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the “Maximum Allowable Emission Rate Table”, or “MAERT” for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

### **Monitoring Sufficiency**

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit’s compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

### **Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected**

#### **Periodic Monitoring:**

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

<b>Unit/Group/Process Information</b>	
ID No.: GRPMETPR	
Control Device ID No.: RFM41N	Control Device Type: Steam Generating Unit (Boiler)/Process Heater (Design heat input is greater than or equal to 44MW)

Control Device ID No.: RFM41S	Control Device Type: Steam Generating Unit (Boiler)/Process Heater (Design heat input is greater than or equal to 44MW)
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R5121-1
Pollutant: VOC	Main Standard: § 115.121(a)(1)
<b>Monitoring Information</b>	
Indicator: Period of Operation	
Minimum Frequency: n/a	
Averaging Period: n/a	
Deviation Limit: All periods that are not recorded	
<p><b>Basis of monitoring:</b>  A common way to control VOC emissions is to route emissions to a boiler or process heater with a design heat input capacity of 44 MW or greater with minimum temperatures of 1100 °C and residence times greater than one second. Boilers and process heaters with the stated design have demonstrated to meet 98% reduction efficiency; therefore, it is only necessary to document the period of operation of the control equipment. Additionally, in the October, 21, 1983 preamble to 40 CFR Part 60, Subpart III, (48 FR 48945), the EPA determined that installing a steam generating unit, with a design heat input capacity of 44 MW or greater, to control VOC emissions, is an acceptable means of demonstrating compliance with 40 CFR Part 60, Subpart III and waived the requirement for a performance test on such devices. Monitoring the period of operation of a boiler/process heater greater than 44 MW is commonly required in federal rules, including: 40 CFR Part 60, Subparts III and NNN; 40 CFR Part 61, Subpart BB; 40 CFR Part 63, Subpart G.</p>	

<b>Unit/Group/Process Information</b>	
ID No.: HR401	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111-2
Pollutant: OPACITY	Main Standard: § 111.111(a)(1)(A)
<b>Monitoring Information</b>	
Indicator: Visible Emissions	
Minimum Frequency: once per calendar quarter	
Averaging Period: n/a	
Deviation Limit: It is a deviation if visible emissions are observed, or if Test Method 9 is performed and opacity is greater than 30%.	
<p>Basis of monitoring:  The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations. The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

<b>Unit/Group/Process Information</b>	
ID No.: HR402	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111-3
Pollutant: OPACITY	Main Standard: § 111.111(a)(1)(A)
<b>Monitoring Information</b>	
Indicator: Visible Emissions	
Minimum Frequency: once per calendar quarter	
Averaging Period: n/a	
Deviation Limit: It is a deviation if visible emissions are observed, or if Test Method 9 is performed and opacity is greater than 30%.	
<p>Basis of monitoring:  The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations. The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

<b>Unit/Group/Process Information</b>	
ID No.: HTR-324	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: 111-3
Pollutant: OPACITY	Main Standard: § 111.111(a)(1)(A)
<b>Monitoring Information</b>	
Indicator: Visible Emissions	
Minimum Frequency: once per calendar quarter	
Averaging Period: n/a	
Deviation Limit: It is a deviation if visible emissions are observed, or if Test Method 9 is performed and opacity is greater than 30%.	
<p>Basis of monitoring:  The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations. The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

<b>Unit/Group/Process Information</b>	
ID No.: MET-TFX46	
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.: 115TK-2
Pollutant: VOC	Main Standard: § 115.112(a)(1)
<b>Monitoring Information</b>	
Indicator: Liquid level	
Minimum Frequency: Once per day	
Averaging Period: n/a	
Deviation Limit: It shall be considered and reported as a deviation anytime the liquid level falls below the fill pipe level.	
<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.: MET-TFX46	
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.: 115TK-2
Pollutant: VOC	Main Standard: § 115.112(a)(1)
<b>Monitoring Information</b>	
Indicator: Structural Integrity of the pipe	
Minimum Frequency: Emptied and degassed	
Averaging Period: n/a	
Deviation Limit: It shall be considered and reported as a deviation if the repairs are not completed prior to refilling the storage vessel.	
<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.: STK-41	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: 111-2
Pollutant: OPACITY	Main Standard: § 111.111(a)(1)(C)
<b>Monitoring Information</b>	
Indicator: Fuel Type	
Minimum Frequency: Annually or at any time an alternate fuel is used	
Averaging Period: n/a	
Deviation Limit: It is a deviation if an alternate fuel is fired alone or in combination with natural gas for a period > 24 consecutive hours; or visible emissions are present during the firing of alternate fuel for a period > 7 consecutive days; or opacity > 15% .	
<p>Basis of monitoring:</p> <p>Industry has demonstrated through performance tests and historical data that opacity and particulate matter standards are consistently met when combustion units fire natural gas only. If the emission unit fires a different fuel for more than 24 hours, the permit holder may elect to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

**Compliance Review**

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on August 27, 2015.

Site rating: 5.95 / Satisfactory Company rating: 5.95 / 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? .....No

2. Is a compliance plan and schedule included in the permit?.....No

**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 Semichemical 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