

Statement of Basis of the Federal Operating Permit

BASF TOTAL Petrochemicals, LLC

Site/Area Name: C4 Olefins Complex
Physical location: Gate 98, Intersection of Highway 73 and Highway 366
Nearest City: Port Arthur
County: Jefferson

Permit Number: O2629
Project Type: Minor Revision

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

- A description of the facility/area process description;
- A description of the revision project;
- A basis for applying permit shields;
- A list of the federal regulatory applicability determinations;
- A table listing the determination of applicable requirements;
- A list of the New Source Review Requirements;
- The rationale for periodic monitoring methods selected;
- The rationale for compliance assurance methods selected;
- A compliance status; and
- A list of available unit attribute forms.

Prepared on: May 1, 2014

Operating Permit Basis of Determination

Description of Revisions

BASF TOTAL Petrochemicals, LLC/C4 Olefins Complex, an organic chemical manufacturing facility, holds a federal operating permit (FOP) which was renewed on 4/12/2011. A minor revision was received by the TCEQ on 2/10/2014 to update 40 CFR Part 60, Subpart Db applicable requirements for boiler X-9835. The following changes were made to the permit content as a result of the minor revision:

- 40 CFR Part 60, Subpart Db applicable requirements for unit X-9835 were updated and incorporated into the FOP.
- Pre-existing 30 TAC Chapter 115, Storage of VOCs permit shields for units D-5272, D-5279X & Z-9811 were rescinded because the basis for each permit shield is no longer valid due to rule change. The permit shields were based on the true vapor pressure of each tank being less than 1.5 psia, which requires recordkeeping.

Permit Area Process Description

Mixed C4 feed stream is received from crude C4 pipeline feed pipeline/storage sphere. 1,3-butadiene is extracted from the mixed C4 stream by the Butadiene (BD) Unit, processed by distillation and extraction to separate the stream into products and byproducts which then stored or routed to the Inalk Unit for further processing via polymerization to produce alkylates (iso-octanes). The alkylate products are further purified before shipping offsite.

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: O2551

Major Source Pollutants

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

Major Pollutants	VOC, PM, NO _x , HAPs, CO, GHG
------------------	--

Reading State of Texas’s Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as “applicable requirements”) that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions

- Special Terms and Conditions
 - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
 - Additional Monitoring Requirements
 - New Source Review Authorization Requirements
 - Compliance Requirements
 - Protection of Stratosphere Ozone
 - Permit Location
 - Permit Shield (30 TAC § 122.148)
- Attachments
 - Applicable Requirements Summary
 - Unit Summary
 - Applicable Requirements Summary
 - Additional Monitoring Requirements
 - Permit Shield
 - New Source Review Authorization References
 - Compliance Plan
 - Alternative Requirements
- Appendix A
 - Acronym list

General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ₁ and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the “index number,” detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

Stationary Vents subject to 30 TAC Chapter 111

Stationary vents subject to 30 TAC Chapter 111 are listed in the permit’s Applicable Requirement Summary. The basis for the applicability determinations for these vents 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:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	Yes
Nonattainment New Source Review (NNSR)	Yes
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	Yes
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	Yes
CAIR (Clean Air Interstate Rule)	No

Basis for Applying Permit Shields

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

Insignificant Activities

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

1. Office activities such as photocopying, blueprint copying, and photographic processes.
2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
4. Outdoor barbecue pits, campfires, and fireplaces.
5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.

7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
9. Vehicle exhaust from maintenance or repair shops.
10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
15. Well cellars.
16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
18. Equipment used exclusively for the melting or application of wax.
19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
20. Shell core and shell mold manufacturing machines.
21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
22. Equipment used for inspection of metal products.
23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
25. Battery recharging areas.
26. Brazing, soldering, or welding equipment.

Determination of Applicable Requirements

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html.

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. 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**
TK-9811	30 TAC Chapter 115, Storage of VOCs	R5112-B	<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 vapor recovery system (VRS)</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 = Flare</p>	
TK-9811	40 CFR Part 63, Subpart G	63G-1	<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 subject to § 63.172 of Subpart H</p> <p>NESHAP Subpart Y Applicability = The unit is subject to 40 CFR Part 61, Subpart Y.</p> <p>NSPS Subpart Kb Applicability = The unit is subject to 40 CFR Part 60, Subpart Kb.</p> <p>Bypass Lines = Closed vent system has no by-pass lines.</p> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is greater than or equal to 11.11 psi (76.6 kPa)</p> <p>Control Device Type = Flare</p> <p>Emission Control Type = Closed vent system (CVS) and control device (fixed roof)</p> <p>Design Evaluation Submitted = Results of a performance test was submitted to demonstrate compliance with 40 CFR § 63.119(e).</p>	<p>The following citations are site-specific:</p> <p>§ 63.120(e)</p> <p>§ 63.120(e)(1)</p> <p>§ 63.120(e)(4)</p> <p>§ 63.122(a)</p> <p>§ 63.122(a)(1)</p> <p>§ 63.148(k)</p>
P-10	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-A	<p>30 TAC CHAPTER 115 (REG V) 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) [REG V] = No alternate control requirements are being utilized.</p> <p>PRODUCT TRANSFERRED = Volatile organic compounds other than liquefied petroleum gas and gasoline.</p> <p>TRANSFER TYPE = Only loading.</p> <p>TRUE VAPOR PRESSURE [REG V] = True vapor pressure less than 0.5 psia.</p>	
P-11	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-B	<p>30 TAC CHAPTER 115 (REG V) 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) [REG V] = No alternate control requirements are being utilized.</p> <p>PRODUCT TRANSFERRED = Volatile organic compounds other than liquefied petroleum gas and gasoline.</p> <p>TRANSFER TYPE = Only loading.</p> <p>TRUE VAPOR PRESSURE [REG V] = True vapor pressure greater than or equal to 0.5 psia.</p> <p>DAILY THROUGHPUT [REG V] = Loading less than 20,000 gallons per day.</p>	
X-9835	40 CFR Part 60, Subpart Db	60Db-A	<p>40 CFR 60 (NSPS) SUBPART DB FUEL TYPE #1 = Natural gas.</p> <p>CONSTRUCTION/MODIFICATION DATE = Constructed or reconstructed after July 9, 1997, and on or before February 28, 2005.</p> <p>40 CFR 60 (NSPS) SUBPART DB HEAT INPUT CAPACITY = Heat input capacity is greater than 100 MMBtu/hr</p>	<p>The following citations are site-specific:</p> <p>Related Standard</p> <p>§ 60.44b(l)</p>

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>(29 MW) but less than or equal to 250 MMBtu/hr (73 MW).</p> <p>60.42B(K)(4) ALTERNATIVE = The requirements of § 60.42b(k)(1) are used.</p> <p>PM MONITORING TYPE = No particulate monitoring.</p> <p>40 CFR 60 (NSPS) SUBPART DA CORRESPONDING APPLICABILITIES [NSPS DB] = The affected facility does not meet applicability requirements of 40 CFR Part 60, Subpart Da.</p> <p>OPACITY MONITORING TYPE = No particulate (opacity) monitoring.</p> <p>40 CFR 60 (NSPS) SUBPART DB CHANGES TO EXISTING AFFECTED FACILITY = No change has been made to the existing steam generating unit, which was not previously subject to 40 CFR Part 60, Subpart Db, for the sole purpose of combusting gases containing totally reduced sulfur as defined under 40 CFR § 60.281.</p> <p>NOX MONITORING TYPE = Continuous emission monitoring system.</p> <p>ELECTRICAL OR MECHANICAL OUTPUT = 10% or less of the annual output is electrical or mechanical.</p> <p>SO₂ MONITORING TYPE = No SO₂ monitoring.</p> <p>SUBPART EA, EB OR AAAA = The affected facility does not meet applicability requirements of and is subject to 40 CFR Part 60, Subpart Ea, Eb or AAAA.</p> <p>SUBPART J CORRESPONDING APPLICABILITIES = The affected facility does not meet applicability requirements of 40 CFR Part 60, Subpart J.</p> <p>SUBPART E CORRESPONDING APPLICABILITIES = The affected facility does not meet applicability requirements of 40 CFR Part 60, Subpart E.</p> <p>SUBPART KKKK = The affected facility is not a heat recovery steam generator associated with combined cycle gas turbines and that meets applicability requirements of and is subject to 40 CFR Part 60, Subpart KKKK.</p> <p>TECHNOLOGY TYPE = None.</p> <p>ACF OPTION - SO₂ = Other ACF or no ACF.</p> <p>SUBPART CB OR BBBB = The affected facility is not covered by an EPA approved State or Federal section 111(d)/129 plan implementing 40 CFR Part 60, Subpart Cb or BBBB emission guidelines.</p> <p>UNIT TYPE = OTHER UNIT TYPE</p> <p>ACF OPTION - PM = Other ACF or no ACF.</p> <p>HEAT RELEASE RATE = Natural gas oil with a heat release rate greater than 70 MBtu/hr/ft³.</p> <p>60.49DA(N) ALTERNATIVE = The facility is not using the § 60.49Da(n) alternative.</p> <p>ACF OPTION - NOX = Other ACF or no ACF.</p> <p>60.49DA(M) ALTERNATIVE = The facility is not using the § 60.49Da(m) alternative.</p>	<p>Reporting</p> <p>§ 60.49b(h)(2)</p> <p>§ 60.49b(h)(2)(ii)</p>
X-9817A	30 TAC Chapter 111, Visible Emissions	R1111-A	<p>ACID GASES ONLY [REG I] = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1.</p> <p>EMERGENCY/UPSET CONDITIONS ONLY [REG I] = Flare is used under conditions other than emergency or upset conditions.</p> <p>ALTERNATE OPACITY LIMITATION [REG I] = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p>	
X-9817B	30 TAC Chapter 111, Visible Emissions	R1111-A	<p>ACID GASES ONLY [REG I] = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1.</p> <p>EMERGENCY/UPSET CONDITIONS ONLY [REG I] = Flare is used under conditions other than emergency or upset conditions.</p> <p>ALTERNATE OPACITY LIMITATION [REG I] = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
X-9817B	40 CFR Part 63, Subpart A	63A-1	<p>REQUIRED UNDER 40 CFR 63 = Flare is required by a Subpart under 40 CFR Part 63.</p> <p>HEAT CONTENT SPECIFICATION = Adhering to the heat content specifications in 40 CFR § 63.11(b)(6)(ii) and the maximum tip velocity specifications in 40 CFR § 63.11(b)(7) or 40 CFR § 63.11(b)(8).</p> <p>FLARE ASSIST TYPE = Steam assisted</p> <p>FLARE EXIT VELOCITY = Flare exit velocity is less than 60 ft/s (18.3 m/sec)</p>	<p>The following citation is site-specific:</p> <p>§ 63.11(b)(6)</p>
ALKFUG	30 TAC Chapter 115, Pet. Refinery & Petrochemicals	R5352-A	<p>COMPRESSOR SEALS/VOC SERVICE [REG V] = YES</p> <p>FLANGES = YES</p> <p>OPEN-ENDED VALVES ANDLINES = YES</p> <p>PRESSURE RELIEF VALVES IN GASEOUS VOC SERVICE [REG V] = YES</p> <p>PROCESS DRAINS/VOC SERVICE [REG V] = YES</p> <p>PUMP SEALS IN VOC SERVICE [REG V] = YES</p> <p>RUPTURE DISKS = RELIEF VALVES EQUIPPED WITH A RUPTURE DISK OR VENTING TO A CONTROL DEVICE ARE IN USE.</p> <p>Title 30 TAC § 115.352 Applicable = Site is a petroleum refinery, synthetic organic chemical, polymer resin or methyl tert-butyl ether (MTBE) manufacturing process or a natural gas/gasoline processing operation as defined in 30 TAC 115.10.</p> <p>VALVES OTHER THAN PRESSURE RELIEF OR OPEN-ENDED/VOC SERVICE [REG V] = YES</p> <p>ACR = NO</p> <p>ACR FOR FLANGES = NO</p> <p>ALTERNATE CONTROL REQUIREMENT (ACR)-- VALVES [REG V] = NO</p> <p>ALTERNATE CONTROL REQUIREMENT (ACR)--COMPRESSOR SEALS [REG V] = NO</p> <p>ALTERNATE CONTROL REQUIREMENT (ACR)--PRESSURE RELIEF VALVES [REG V] = NO</p> <p>ALTERNATE CONTROL REQUIREMENT (ACR)--PROCESS DRAINS [REG V] = NO</p> <p>ALTERNATE CONTROL REQUIREMENT (ACR)--PUMP SEALS [REG V] = NO</p> <p>INSTRUMENTATION SYSTEMS = FUGITIVE UNIT HAS INSTRUMENTATION SYSTEMS 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 CONNECTON SYSTEMS = FUGITIVE UNIT HAS SAMPLING CONNECTION SYSTEMS THAT MEET 40 CFR § 63.169</p> <p>WEIGHT PERCENT VOC IN PROCESS FLUID [REG V] = PROCESS FLUID CONTAINS AT LEAST 10% VOC BY WEIGHT (PETROLEUM REFINERY, SYNTHETIC ORGANIC CHEMICAL, POLYMER RESIN OR MTBE MANUFACTURING PROCESSES)</p> <p>COMPLYING WITH §115.352(1) = YES</p> <p>COMPLYING W/ 30 TAC 115.352(1)--PROCESS DRAINS = YES</p> <p>RECIPROCATING COMPRESSORS OR POSITIVE DISPLACEMENT PUMPS [REG V] = NO RECIPROCATING COMPRESSORS OR POSITIVE DISPLACEMENT PUMPS USED IN NATURAL GAS/GASOLINE PROCESSING OPERATIONS</p> <p>TVP LESS THAN OR EQUAL TO 0.002 PSIA = FUGITIVE UNIT HAS COMPONENTS THAT CONTACT A PROCESS FLUID CONTAINING A PROCESS FLUID CONTAINING VOC HAVING A TRUE VAPOR PRESSURE OF 0.002 PSIA OR LESS</p>	<p>The following citations are site-specific:</p> <p>§ 115.354(1)(B)</p> <p>§ 115.354(1)(C)</p> <p>§ 115.354(10)</p> <p>§ 115.357(6)</p> <p>§ 115.357(9)</p> <p>§ 115.357(9)(A)</p> <p>§ 115.357(13)</p>

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>TVP LESS THAN OR EQUAL TO 0.044 PSIA AT 68 DEGREES F--PROCESS DRAINS [REG V] = PROCESS FLUID HAS A TRUE VAPOR PRESSURE (TVP) LESS THAN OR EQUAL TO 0.044 PSIA AT 68 DEGREES FAHRENHEIT</p> <p>TVP OF PROCESS FLUID LESS THAN OR EQUAL TO 0.044 PSIA = YES</p> <p>TVP OF PROCESS FLUID VOC <= 0.044 PSI @ 68° = YES</p> <p>TVP OR PROCESS FLUID LESS THAN OR EQUAL TO 0.044 PSIA = YES</p> <p>REMAINING SEALS COMPLY WITH 115.352(1)--PUMP SEALS [REG V] = YES</p> <p>TVP GREATER THAN 0.044 PSIA AT 68 DEGREES F--PROCESS DRAINS [REG V] = PROCESS FLUID HAS A TRUE VAPOR PRESSURE (TVP) LESS THAN OR EQUAL TO 0.044 PSIA AT 68 DEGREES FAHRENHEIT</p> <p>TVP OF PROCESS FLUID > 0.044 PSIA = YES</p> <p>TVP OF PROCESS FLUID LESS THAN OR EQUAL TO 0.044 PSIA = YES</p> <p>TVP OF PROCESS FLUID VOC > 0.044 PSIA @ 68° F = YES</p> <p>Complying With § 115.352(1) = YES</p>	
ALKFUG	40 CFR Part 60, Subpart VV	60VV-A	<p>CLOSED VENT (OR VAPOR COLLECTION) SYSTEM [NSPS VV] = YES</p> <p>CLOSED-VENT SYSTEM (CVS) WITH ENCLOSED COMBUSTION DEVICE [NSPS VV] = NO CLOSED VENT SYSTEM WITH ENCLOSED COMBUSTION DEVICE AS CONTROL DEVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT.</p> <p>CLOSED-VENT SYSTEM (CVS) WITH FLARE AS CONTROL DEVICE [NSPS VV] = CLOSED VENT SYSTEM WITH FLARE AS CONTROL DEVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT.</p> <p>CLOSED-VENT SYSTEM (CVS) WITH VAPOR RECOVERY SYSTEM [NSPS VV] = CLOSED VENT SYSTEM WITH VAPOR RECOVERY SYSTEM AS CONTROL DEVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT.</p> <p>COMPRESSORS (ANY SERVICE) [NSPS VV] = COMPRESSORS IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT.</p> <p>EQUIPMENT IN VACUUM SERVICE [NSPS VV] = NO EQUIPMENT IN VACUUM SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT.</p> <p>OPEN-ENDED VALVES OR LINES (ANY SERVICE) [NSPS VV] = NO OPEN-ENDED VALVES OR LINES IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT.</p> <p>PRODUCES CHEMICALS LISTED IN 40 CFR 60.489 = PRODUCES AS INTERMEDIATE OR FINAL PRODUCT ONE OR MORE CHEMICALS LISTED IN 40 CFR 60.489</p> <p>VALVES HEAVY LIQUID SERVICE [NSPS VV] = NO VALVES IN HEAVY LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT.</p> <p>AFFECTED FACILITY AS DEFINED IN 40 CFR 60.480(A)(2) = FACILITY IS AN AFFECTED FACILITY AS DEFINED IN 40 CFR 60.480(A)(2)</p> <p>EQUIVALENT EMISSION LIMITATION (EEL) UNDER 40 CFR 60.482-1(C) = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>EQUIVALENT EMISSION LIMITATION (EEL)--COMPRESSORS [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>EQUIVALENT EMISSION LIMITATION (EEL)--CVS/FLARE [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>EQUIVALENT EMISSION LIMITATION (EEL)--CVS/VAPOR RECOVERY SYSTEM [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p>	<p>The following citation is site-specific:</p> <p>[G]§ 60.485(e)</p>

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>PUMPS IN LIGHT LIQUID SERVICE [NSPS VV] = PUMPS IN LIGHT LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT.</p> <p>40 CFR 60 (NSPS) SUBPART VV CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE = AFTER JANUARY 5, 1981</p> <p>EQUIVALENT EMISSION LIMITATION (EEL)--PUMPS LIGHT LIQUID SERVICE [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>40 CFR 60 SUBPART VV DESIGN CAPACITY = SITE WITH DESIGN CAPACITY GREATER THAN OR EQUAL TO 1,000 MEGAGRAMS PER YEAR</p> <p>COMPLYING W/ 40 CFR 60.482-10--CLOSED VENT SYSTEM W/ FLARE [NSPS VV] = COMPLYING WITH 40 CFR 60.482-10</p> <p>COMPLYING W/ 40 CFR 60.482-10--CLOSED VENT SYSTEM W/ VAPOR RECOVERY SYS [NSPS VV] = COMPLYING WITH 40 CFR 60.482-10</p> <p>COMPLYING W/ 40 CFR 60.482-3--COMPRESSORS [NSPS VV] = COMPLYING WITH 40 CFR 60.482-3</p> <p>COMPLYING WITH 60.482-10 (NSPS VV) = YES</p> <p>COMPLYING W/ 40 CFR 60.482-2--PUMPS LIGHT LIQUID SERVICE [NSPS VV] = COMPLYING WITH 40 CFR 60.482-2</p> <p>FLANGES AND OTHER CONNECTORS (ANY SERVICE) [NSPS VV] = FLANGES OR CONNECTORS IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT.</p> <p>PRESSURE RELIEF DEVICES GAS/VAPOR SERVICE [NSPS VV] = PRESSURE RELIEF DEVICES IN GAS/VAPOR SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT.</p> <p>PRODUCES HEAVY LIQUID CHEMICALS FROM HEAVY LIQUID FEED/RAW MATERIAL [NSPS VV] = THE FACILITY PRODUCES OTHER THAN HEAVY LIQUID CHEMICALS ONLY FROM HEAVY LIQUID FEED OR RAW MATERIALS</p> <p>SAMPLING CONNECTION SYSTEMS (ANY SERVICE) [NSPS VV] = SAMPLING CONNECTION SYSTEMS IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT.</p> <p>VALVES GAS/VAPOR OR LIGHT LIQUID SERVICE [NSPS VV] = VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT.</p> <p>BEVERAGE ALCOHOL PRODUCTION [NSPS VV] = THE FACILITY DOES NOT PRODUCE BEVERAGE ALCOHOL</p> <p>COMPLY WITH §60.482-4(A)-(B) = YES</p> <p>EQUIVALENT EMISSION LIMITATION (EEL)--FLANGES/CONNECTORS [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>EQUIVALENT EMISSION LIMITATION (EEL)--SAMPLING CONNECTION SYSTEMS [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>EQUIVALENT EMISSION LIMITATION (EEL)--VALVES GAS/VAPOR, LIGHT LIQUID SVC [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL).</p> <p>PUMPS IN HEAVY LIQUID SERVICE [NSPS VV] = NO PUMPS IN HEAVY LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT.</p> <p>CONTAINS EQUIPMENT DESIGNED TO OPERATE IN VOC SERVICE [NSPS VV] = FACILITY CONTAINS EQUIPMENT DESIGNED TO OPERATE IN VOC SERVICE</p> <p>COMPLYING W/ 40 CFR 60.482-5--SAMPLING CONNECTION SYSTEMS [NSPS VV] = COMPLYING WITH 40 CFR 60.482-5</p> <p>COMPLYING W/ 40 CFR 60.482-7--VALVES GAS/VAPOR OR LIGHT LIQUID SERVICE [NSPS VV] = COMPLYING WITH 40 CFR 60.482-7</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			COMPLYING W/ 40 CFR 60.482-8--FLANGES AND OTHER CONNECTORS [NSPS VV] = COMPLYING WITH 40 CFR 60.482-8	
BDECVS	40 CFR Part 63, Subpart H	63H-2	<p>ANY (CLOSED VENT SYSTEMS) = COMPONENT PRESENT</p> <p>ANY (OPEN-ENDED VALVES OR LINES) = COMPONENT NOT PRESENT</p> <p>BYPASS LINES = FUGITIVE UNIT WITH A CLOSED-VENT SYSTEM DOES NOT 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 (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 = FOR A FUGITIVE UNIT THAT CONTAINS ANY CLOSED-VENT SYSTEM, THERE ARE NO PARTS DESIGNATED AS UNSAFE TO INSPECT</p> <p>ANY (INSTRUMENTATION SYSTEMS) = COMPONENT NOT 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 NOT 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>EMPLOYEE NUMBER = THE CORPORATION EMPLOYS 100 OR MORE PERSONS</p> <p>ENCLOSED COMBUSTION DEVICES (CLOSED VENT 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 NOT PRESENT</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 PRESENT</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (CONNECTORS) = COMPONENT NOT PRESENT</p> <p>GENERAL AMEL = UNIT IS NOT COMPLYING WITH AN ALTERNATE MEANS OF EMISSION LIMITATION UNDER § 63.177</p>	<p>The following citations are site-specific:</p> <p>§ 63.162(a)</p> <p>[G]§ 63.162(f)</p> <p>[G]§ 63.162(g)</p> <p>§ 63.162(h)</p> <p>§ 63.164(h)</p> <p>§ 63.166(b)(1)</p> <p>§ 63.166(b)(2)</p> <p>§ 63.166(b)(3)</p> <p>§ 63.6625(f)</p> <p>§ 63.166(c)</p> <p>§ 63.180(a)</p> <p>[G]§ 63.181(i)</p>

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT HEAVY LIQUID SERVICE (CONNECTORS) = COMPONENT NOT PRESENT HEAVY LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT ANY (SAMPLING CONNECTION SYSTEMS) = COMPONENT NOT PRESENT UNITS WITHOUT AMEL = ALL FUGITIVE UNIT EQUIPMENT OR PROCESS UNITS ARE COMPLYING WITH AN ALTERNATE MEANS OF EMISSION LIMITATION.	
BDEFUG	30 TAC Chapter 115, Pet. Refinery & Petrochemicals	R5352-A	COMPRESSOR SEALS/VOC SERVICE [REG V] = YES FLANGES = YES OPEN-ENDED VALVES ANDLINES = YES PRESSURE RELIEF VALVES IN GASEOUS VOC SERVICE [REG V] = YES PROCESS DRAINS/VOC SERVICE [REG V] = YES PUMP SEALS IN VOC SERVICE [REG V] = YES RUPTURE DISKS = RELIEF VALVES EQUIPPED WITH A RUPTURE DISK OR VENTING TO A CONTROL DEVICE ARE IN USE. Title 30 TAC § 115.352 Applicable = Site is a petroleum refinery, synthetic organic chemical, polymer resin or methyl tert-butyl ether (MTBE) manufacturing process or a natural gas/gasoline processing operation as defined in 30 TAC 115.10. VALVES OTHER THAN PRESSURE RELIEF OR OPEN-ENDED/VOC SERVICE [REG V] = YES ACR = NO ACR FOR FLANGES = NO ALTERNATE CONTROL REQUIREMENT (ACR)-- VALVES [REG V] = NO ALTERNATE CONTROL REQUIREMENT (ACR)--COMPRESSOR SEALS [REG V] = NO ALTERNATE CONTROL REQUIREMENT (ACR)--PRESSURE RELIEF VALVES [REG V] = NO ALTERNATE CONTROL REQUIREMENT (ACR)--PROCESS DRAINS [REG V] = NO ALTERNATE CONTROL REQUIREMENT (ACR)--PUMP SEALS [REG V] = NO INSTRUMENTATION SYSTEMS = FUGITIVE UNIT HAS INSTRUMENTATION SYSTEMS THAT MEET 40 CFR § 63.169 Less Than 250 Components at Site = Fugitive unit not located at site with less than 250 fugitive components. SAMPLING CONNECTION SYSTEMS = FUGITIVE UNIT HAS SAMPLING CONNECTION SYSTEMS THAT MEET 40 CFR § 63.169 WEIGHT PERCENT VOC IN PROCESS FLUID [REG V] = PROCESS FLUID CONTAINS AT LEAST 10% VOC BY WEIGHT (PETROLEUM REFINERY, SYNTHETIC ORGANIC CHEMICAL, POLYMER RESIN OR MTBE MANUFACTURING PROCESSES) COMPLYING WITH §115.352(1) = YES COMPLYING W/ 30 TAC 115.352(1)--PROCESS DRAINS = YES RECIPROCATING COMPRESSORS OR POSITIVE DISPLACEMENT PUMPS [REG V] = NO RECIPROCATING COMPRESSORS OR POSITIVE DISPLACEMENT PUMPS USED IN NATURAL GAS/GASOLINE PROCESSING OPERATIONS TVP LESS THAN OR EQUAL TO 0.002 PSIA = FUGITIVE UNIT HAS COMPONENTS THAT CONTACT A PROCESS FLUID CONTAINING A PROCESS FLUID CONTAINING VOC HAVING A TRUE VAPOR PRESSURE	The following citations are site-specific: § 115.354(1)(B) § 115.354(1)(C) § 115.354(10) § 115.357(6) § 115.357(9) § 115.357(9)(A) § 115.357(13)

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>OF 0.002 PSIA OR LESS</p> <p>TVP LESS THAN OR EQUAL TO 0.044 PSIA AT 68 DEGREES F--PROCESS DRAINS [REG V] = PROCESS FLUID HAS A TRUE VAPOR PRESSURE (TVP) LESS THAN OR EQUAL TO 0.044 PSIA AT 68 DEGREES FAHRENHEIT</p> <p>TVP OF PROCESS FLUID LESS THAN OR EQUAL TO 0.044 PSIA = YES</p> <p>TVP OF PROCESS FLUID VOC <= 0.044 PSI @ 68° = YES</p> <p>TVP OR PROCESS FLUID LESS THAN OR EQUAL TO 0.044 PSIA = YES</p> <p>REMAINING SEALS COMPLY WITH 115.352(1)--PUMP SEALS [REG V] = YES</p> <p>TVP GREATER THAN 0.044 PSIA AT 68 DEGREES F--PROCESS DRAINS [REG V] = PROCESS FLUID HAS A TRUE VAPOR PRESSURE (TVP) LESS THAN OR EQUAL TO 0.044 PSIA AT 68 DEGREES FAHRENHEIT</p> <p>TVP OF PROCESS FLUID > 0.044 PSIA = YES</p> <p>TVP OF PROCESS FLUID LESS THAN OR EQUAL TO 0.044 PSIA = YES</p> <p>TVP OF PROCESS FLUID VOC > 0.044 PSIA @ 68° F = YES</p> <p>Complying With § 115.352(1) = YES</p>	
BDEFUG	40 CFR Part 63, Subpart H	63H-1	<p>ANY (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>ANY (OPEN-ENDED VALVES OR LINES) = COMPONENT PRESENT</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 PRESENT</p> <p>HEAVY LIQUID SERVICE (OPEN-ENDED VALVES OR LINES) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (PUMPS) = COMPONENT 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>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>GAS/VAPOR OR LIGHT LIQUID SERVICE (VALVES) = COMPONENT PRESENT</p> <p>QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR PUMPS</p> <p>VACUUM SERVICE = NOT ALL OF THE EQUIPMENT IN THE FUGITIVE UNIT IS IN VACUUM SERVICE</p> <p>ANY (COMPRESSORS) = COMPONENT PRESENT</p> <p>EMPLOYEE NUMBER = THE CORPORATION EMPLOYS 100 OR MORE PERSONS</p> <p>HEAVY LIQUID SERVICE (INSTRUMENTATION SYSTEMS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (VALVES) = COMPONENT 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>The following citations are site-specific:</p> <p>§ 63.162(a)</p> <p>[G]§ 63.162(f)</p> <p>[G]§ 63.162(g)</p> <p>§ 63.162(h)</p> <p>§ 63.164(h)</p> <p>§ 63.166(b)(1)</p> <p>§ 63.166(b)(2)</p> <p>§ 63.166(b)(3)</p> <p>§ 63.6625(f)</p> <p>§ 63.166(c)</p> <p>§ 63.180(a)</p> <p>[G]§ 63.181(i)</p>

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>ANY (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT</p> <p>GAS VAPOR SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT</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>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 PRESENT</p> <p>HEAVY LIQUID SERVICE (CONNECTORS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT</p> <p>ANY (SAMPLING CONNECTION SYSTEMS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (SAMPLING CONNECTION SYSTEMS) = COMPONENT PRESENT</p> <p>UNITS WITHOUT AMEL = FUGITIVE UNIT EQUIPMENT OR PROCESS UNITS ARE NOT COMPLYING WITH AN ALTERNATE MEANS OF EMISSION LIMITATION.</p>	
D-5237	30 TAC Chapter 115, Water Separation	R5131-B	<p>ALTERNATE CONTROL REQUIREMENT (ACR) [REG V] = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910.</p> <p>EXEMPTION FROM CONTROL REQUIREMENTS OF 115.132 [REG V] = 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>	
D-5251	30 TAC Chapter 115, Water Separation	R5131-B	<p>ALTERNATE CONTROL REQUIREMENT (ACR) [REG V] = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910.</p> <p>EXEMPTION FROM CONTROL REQUIREMENTS OF 115.132 [REG V] = 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>	
D-5293	30 TAC Chapter 115, Water Separation	R5131-B	<p>ALTERNATE CONTROL REQUIREMENT (ACR) [REG V] = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910.</p> <p>EXEMPTION FROM CONTROL REQUIREMENTS OF 115.132 [REG V] = 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>	
D-5402	30 TAC Chapter 115, Water Separation	R5131-B	<p>ALTERNATE CONTROL REQUIREMENT (ACR) [REG V] = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910.</p> <p>EXEMPTION FROM CONTROL REQUIREMENTS OF 115.132 [REG V] = 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>	
BLR	30 TAC Chapter 111, Visible Emissions	R1111-B	<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>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Construction Date = After January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.</p>	
P-6	30 TAC Chapter 115, Vent Gas Controls	R5121-B	<p>Alternate Control Requirement = Alternate control is not used.</p> <p>Control Device Type = Smokeless flare</p> <p>Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is greater than 100 pounds (45.4 kg).</p>	
P-7	30 TAC Chapter 115, Vent Gas Controls	R5121-B	<p>Alternate Control Requirement = Alternate control is not used.</p> <p>Control Device Type = Smokeless flare</p> <p>Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is greater than 100 pounds (45.4 kg).</p>	
T-5401	40 CFR Part 60, Subpart NNN	60NNN-A	<p>40 CFR 60 (NSPS) SUBPART NNN CHEMICALS = DISTILLATION UNIT PRODUCES ANY CHEMICAL LISTED IN 40 CFR § 60.667 AS A PRODUCT, CO-PRODUCT, BY-PRODUCT, OR INTERMEDIATE</p> <p>TOTAL RESOURCE EFFECTIVENESS (TRE) [NSPS NNN] = < OR EQUAL TO 8.0 NOT FROM HALOGENATED VENT STREAM</p> <p>CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS NNN] = AFTER DECEMBER 30, 1983</p> <p>TOTAL ORGANIC COMPOUNDS (TOC) REDUCTION = COMPLIANCE IS ACHIEVED THROUGH THE USE OF A FLARE OR RECOVERY DEVICE</p> <p>40 CFR 60 (NSPS) SUBPART NNN CONTROL DEVICE = BOILER/PROCESS HEATER < 44 MW</p> <p>VENT TYPE [NSPS NNN] = DISCHARGING TO A VRS</p> <p>DISTILLATION UNIT TYPE (NSPS NNN) = DOES NOT QUALIFY FOR ANY EXEMPTION IN § 60.660(C)(1)-(3)</p> <p>TOTAL DESIGN CAPACITY [NSPS NNN] = > OR EQUAL TO 1 GGRAM/YR</p> <p>VENT STREAM FLOW RATE [NSPS NNN] = > OR EQUAL TO 0.008 SCM/MIN</p>	<p>The following citation is site-specific:</p> <p>§ 60.662</p>
R-5281	40 CFR Part 60, Subpart RRR	60RRR-A	<p>CHEMICALS LISTED IN §60.707 = AFFECTED FACILITY IS PART OF A PROCESS UNIT THAT PRODUCES ANY CHEMICALS LISTED IN 40 CFR § 60.707 AS A PRODUCT, CO-PRODUCT, BY PRODUCT, OR INTERMEDIATE</p> <p>SECONDARY FUEL = VENT STREAM INTRODUCED WITH COMBUSTION AIR OR AS SECONDARY FUEL</p> <p>TOTAL DESIGN CAPACITY = TOTAL DESIGN CAPACITY IS GREATER THAN OR EQUAL TO 1 GIGAGRAM PER YEAR (1,100 TONS PER YEAR)</p> <p>BYPASS LINE = BYPASS LINE THAT CAN DIVERT VENT STREAM AROUND THE CONTROL DEVICE</p> <p>CONSTRUCTION/MODIFICATION DATE = AFTER JUNE 29, 1990</p> <p>VENT STREAM FLOW RATE = VENT STREAM FLOW RATE IS GREATER THAN OR EQUAL TO 0.011 SCM/MIN OR VALUE IS NOT MEASURED</p> <p>AFFECTED FACILITY TYPE = COMBINATION OF A REACTOR PROCESS AND THE RECOVERY SYSTEM INTO WHICH ITS VENT STREAM IS DISCHARGED</p> <p>BYPASS LINE VALVE SECURED = FLOW INDICATOR USED</p> <p>TOC EXEMPTION = NO TOC CONCENTRATION EXEMPTION</p> <p>CONTROL DEVICE = BOILER OR PROCESS HEATER WITH A DESIGN HEAT INPUT LESS THAN 44 MW</p> <p>SUBJECT TO TITLE 40 CFR PART 60 SUBPART DDD = NO</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>SUBJECT TO TITLE 40 CFR PART 60 SUBPART NNN = NO</p> <p>TRE INDEX VALUE = TRE INDEX VALUE IS LESS THAN OR EQUAL TO 8.0, OR A TRE INDEX VALUE IS NOT CALCULATED OR CLAIMED FOR EXEMPTION § 60.700(C)(2)</p> <p>TRE FOR HALOGENATED VENT STREAM = NO</p>	
R-5402A	40 CFR Part 60, Subpart RRR	60RRR-C	<p>CHEMICALS LISTED IN §60.707 = AFFECTED FACILITY IS PART OF A PROCESS UNIT THAT PRODUCES ANY CHEMICALS LISTED IN 40 CFR § 60.707 AS A PRODUCT, CO-PRODUCT, BY PRODUCT, OR INTERMEDIATE</p> <p>TOTAL DESIGN CAPACITY = TOTAL DESIGN CAPACITY IS GREATER THAN OR EQUAL TO 1 GIGAGRAM PER YEAR (1,100 TONS PER YEAR)</p> <p>CONSTRUCTION/MODIFICATION DATE = AFTER JUNE 29, 1990</p> <p>VENT STREAM FLOW RATE = VENT STREAM FLOW RATE IS GREATER THAN OR EQUAL TO 0.011 SCM/MIN OR VALUE IS NOT MEASURED</p> <p>AFFECTED FACILITY TYPE = COMBINATION OF A REACTOR PROCESS AND THE RECOVERY SYSTEM INTO WHICH ITS VENT STREAM IS DISCHARGED</p> <p>SUBJECT TO TITLE 40 CFR PART 60 SUBPART DDD = NO</p> <p>SUBJECT TO TITLE 40 CFR PART 60 SUBPART NNN = YES</p> <p>TRE INDEX VALUE = TRE INDEX VALUE IS LESS THAN OR EQUAL TO 8.0, OR A TRE INDEX VALUE IS NOT CALCULATED OR CLAIMED FOR EXEMPTION § 60.700(C)(2)</p> <p>TRE FOR HALOGENATED VENT STREAM = NO</p>	
R-5402B	40 CFR Part 60, Subpart RRR	60RRR-C	<p>CHEMICALS LISTED IN §60.707 = AFFECTED FACILITY IS PART OF A PROCESS UNIT THAT PRODUCES ANY CHEMICALS LISTED IN 40 CFR § 60.707 AS A PRODUCT, CO-PRODUCT, BY PRODUCT, OR INTERMEDIATE</p> <p>TOTAL DESIGN CAPACITY = TOTAL DESIGN CAPACITY IS GREATER THAN OR EQUAL TO 1 GIGAGRAM PER YEAR (1,100 TONS PER YEAR)</p> <p>CONSTRUCTION/MODIFICATION DATE = AFTER JUNE 29, 1990</p> <p>VENT STREAM FLOW RATE = VENT STREAM FLOW RATE IS GREATER THAN OR EQUAL TO 0.011 SCM/MIN OR VALUE IS NOT MEASURED</p> <p>AFFECTED FACILITY TYPE = COMBINATION OF A REACTOR PROCESS AND THE RECOVERY SYSTEM INTO WHICH ITS VENT STREAM IS DISCHARGED</p> <p>SUBJECT TO TITLE 40 CFR PART 60 SUBPART DDD = NO</p> <p>SUBJECT TO TITLE 40 CFR PART 60 SUBPART NNN = YES</p> <p>TRE INDEX VALUE = TRE INDEX VALUE IS LESS THAN OR EQUAL TO 8.0, OR A TRE INDEX VALUE IS NOT CALCULATED OR CLAIMED FOR EXEMPTION § 60.700(C)(2)</p> <p>TRE FOR HALOGENATED VENT STREAM = NO</p>	
PRO-BDE	40 CFR Part 63, Subpart F	63F-1	<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 NOT AN 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 (HAPS) IN TABLE 2</p> <p>Table 4 HAP Content = A RECIRCULATING HEAT EXCHANGE SYSTEM IS NOT USED TO COOL PROCESS</p>	<p>The following citations are site-specific:</p> <p>§ 63.103(a)</p> <p>§ 63.103(b)</p> <p>§ 63.103(c)</p>

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>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 = AN ALTERNATIVE MEANS OF EMISSION LIMITATION IS NOT USED TO ACHIEVE A REDUCTION IN ORGANIC HAP EMISSION</p> <p>NPDES Permit = HEAT EXCHANGE SYSTEM IS NOT SUBJECT TO A NPDES PERMIT WITH ALLOWABLE DISCHARGE LIMIT</p> <p>Meets 40 CFR 63.104(a)(4)(i)-(iv) = HEAT EXCHANGER NOT REQUIRED TO MEET THIS CITATION</p> <p>Heat Exchange System = A HEAT EXCHANGE SYSTEM IS USED</p> <p>Table 9 HAP Content = ONCE-THROUGH HEAT EXCHANGE SYSTEM IS NOT USED 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 = 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> <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>	

* - 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

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

Prevention of Significant Deterioration (PSD) Permits	
PSD Permit No.: PSDTX950	Issuance Date: 02/08/2013
Nonattainment (NA) Permits	
NA Permit No.: No18	Issuance Date: 02/08/2013
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.	
Authorization No.: 41945	Issuance Date: 02/08/2013
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.262	Version No./Date: 11/01/2003
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.472	Version No./Date: 09/04/2000

Emission Units and Emission Points

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sandblasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

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

Monitoring Sufficiency

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

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

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

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:

Unit/Group/Process Information	
ID No.: BLR	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111-B
Pollutant: OPACITY	Main Standard: § 111.111(a)(1)(B)
Monitoring Information	
Indicator: Visible emissions	
Minimum Frequency: Quarterly	
Averaging Period: n/a	
Deviation Limit: It is a deviation if opacity exceeds 20%.	

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. 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.

Unit/Group/Process Information	
ID No.: TK-9811	
Control Device ID No.: X-9817B	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-B
Pollutant: VOC	Main Standard: § 115.112(a)(1)
Monitoring Information	
Indicator: Pilot flame	
Minimum Frequency: Once per hour	
Averaging Period: n/a	
Deviation Limit: Loss of all pilots on flare	
<p>Basis of monitoring: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.</p>	

Compliance Assurance Monitoring (CAM):

Compliance Assurance Monitoring (CAM) is a federal monitoring program established under Title 40 Code of Federal Regulations Part 64 (40 CFR Part 64).

Emission units are subject to CAM requirements if they meet the following criteria:

1. the emission unit is subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement;
2. the emission unit uses a control device to achieve compliance with the emission limitation or standard specified in the applicable requirement; and
3. the emission unit has the pre-control device potential to emit greater than or equal to the amount in tons per year for a site to be classified as a major source.

The following table(s) identify the emission unit(s) that are subject to CAM:

Unit/Group/Process Information	
ID No.: P-6	
Control Device ID No.: X-9817B	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R5121-B
Pollutant: VOC	Main Standard: § 115.121(a)(1)
Monitoring Information	
Indicator: Pilot flame	
Minimum Frequency: Continuously	
Averaging Period: n/a	
Deviation Limit: The absence of a pilot flame, after visual verification, is a deviation.	
Basis of CAM: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.	

Unit/Group/Process Information	
ID No.: P-7	
Control Device ID No.: X-9817A	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R5121-B
Pollutant: VOC	Main Standard: § 115.121(a)(1)
Monitoring Information	
Indicator: Pilot flame	
Minimum Frequency: Continuously	
Averaging Period: n/a	
Deviation Limit: The absence of a pilot flame, after visual verification, is a deviation.	
Basis of CAM: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.	

Available Unit Attribute Forms

OP-UA1 - Miscellaneous and Generic Unit Attributes
OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes
OP-UA3 - Storage Tank/Vessel Attributes
OP-UA4 - Loading/Unloading Operations Attributes
OP-UA5 - Process Heater/Furnace Attributes
OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes
OP-UA7 - Flare Attributes
OP-UA8 - Coal Preparation Plant Attributes
OP-UA9 - Nonmetallic Mineral Process Plant Attributes
OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes
OP-UA11 - Stationary Turbine Attributes
OP-UA12 - Fugitive Emission Unit Attributes
OP-UA13 - Industrial Process Cooling Tower Attributes
OP-UA14 - Water Separator Attributes
OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes
OP-UA16 - Solvent Degreasing Machine Attributes
OP-UA17 - Distillation Unit Attributes
OP-UA18 - Surface Coating Operations Attributes
OP-UA19 - Wastewater Unit Attributes
OP-UA20 - Asphalt Operations Attributes
OP-UA21 - Grain Elevator Attributes
OP-UA22 - Printing Attributes
OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes
OP-UA25 - Synthetic Fiber Production Attributes
OP-UA26 - Electroplating and Anodizing Unit Attributes
OP-UA27 - Nitric Acid Manufacturing Attributes
OP-UA28 - Polymer Manufacturing Attributes
OP-UA29 - Glass Manufacturing Unit Attributes
OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semicheical Pulp Mill Attributes
OP-UA31 - Lead Smelting Attributes
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes
OP-UA33 - Metallic Mineral Processing Plant Attributes
OP-UA34 - Pharmaceutical Manufacturing
OP-UA35 - Incinerator Attributes
OP-UA36 - Steel Plant Unit Attributes
OP-UA37 - Basic Oxygen Process Furnace Unit Attributes
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes
OP-UA39 - Sterilization Source Attributes
OP-UA40 - Ferroalloy Production Facility Attributes
OP-UA41 - Dry Cleaning Facility Attributes
OP-UA42 - Phosphate Fertilizer Manufacturing Attributes
OP-UA43 - Sulfuric Acid Production Attributes
OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes
OP-UA45 - Surface Impoundment Attributes
OP-UA46 - Epoxy Resins and Non-Nylon Polyamides Production Attributes
OP-UA47 - Ship Building and Ship Repair Unit Attributes
OP-UA48 - Air Oxidation Unit Process Attributes
OP-UA49 - Vacuum-Producing System Attributes
OP-UA50 - Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes

OP-UA51 - Dryer/Kiln/Oven Attributes
OP-UA52 - Closed Vent Systems and Control Devices
OP-UA53 - Beryllium Processing Attributes
OP-UA54 - Mercury Chlor-Alkali Cell Attributes
OP-UA55 - Transfer System Attributes
OP-UA56 - Vinyl Chloride Process Attributes
OP-UA57 - Cleaning/Depainting Operation Attributes
OP-UA58 - Treatment Process Attributes
OP-UA59 - Coke By-Product Recovery Plant Attributes
OP-UA60 - Chemical Manufacturing Process Unit Attributes
OP-UA61 - Pulp, Paper, or Paperboard Producing Process Attributes
OP-UA62 - Glycol Dehydration Unit Attributes
OP-UA63 - Vegetable Oil Production Attributes