

Statement of Basis of the Federal Operating Permit

Equistar Chemicals, LP

Site/Area Name: Equistar Victoria Plant
Physical location: 2699 Old Bloomington Rd N
Nearest City: Victoria
County: Victoria

Permit Number: O1308
Project Type: Minor Revision

Standard Industrial Classification (SIC) Code: 2821
SIC Name: Plastics Materials

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 7, 2014

Operating Permit Basis of Determination

Description of Revisions

Equistar submitted a minor revision application on February 7, 2014 to update the issuance date of NSR Permit 811B. NSR Permit No. 811B was amended on January 30, 2014 to correct the representation for three tanks.

Permit Area Process Description

The Equistar Victoria Plant produces HDPE polymers and copolymers containing ethylene, and a second monomer such as octene.

Hexane is used as a carrier solvent and toluene is used as an additive solvent. The main process operations in the production of HDPE include pumping and compression of raw materials, reaction, separation, and raw material recovery and distillation. The raw materials are first purified and then mixed and reacted, before the product HDPE is separated, formed, cleansed, stored, and transported offsite via railcar. Much of the bulk materials are recovered, via separation processes, from the HDPE product. Subsequent distillation processes recover the individual raw materials which are recycled to the “front-end” of the process.

Purge streams from the pumping and compression and the raw material recovery and distillation sections are sent to the nearby DuPont facility boilers, where they are used as boiler fuel. The primary purpose of these purge streams is to remove impurities that would otherwise accumulate in the system. Other waste streams containing VOC are routed to the flare.

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, HAPS
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Reading State of Texas’s Federal Operating Permit

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

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

- General Terms and Conditions

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

General Terms and Conditions

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

Special Terms and Conditions

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

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

Attachments

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

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

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

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

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

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

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

Appendix A

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

Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit’s Applicable Requirement Summary. This is consistent with EPA’s White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995,

that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

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

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

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

Federal Regulatory Applicability Determinations

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

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	No
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	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*
340	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-1	Brake HP = Stationary RICE with a brake hp greater than or equal to 250 hp and less than 300 hp. Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002. Service Type = Emergency use. Stationary RICE Type = Compression ignition engine
1	30 TAC Chapter 115, Storage of VOCs	115B-1	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using an internal floating roof (IFR) True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 25,000 gallons but less than or equal to 40,000 gallons
1	40 CFR Part 60, Subpart K	60K-1	Construction/Modification Date = After March 8, 1974 and on or before May 19, 1978 Storage Capacity = Capacity is 40,000 gallons (151,416 liters) or less
1	40 CFR Part 63, Subpart FFFF	63FFFF-TK1	Emission Standard = HAP vapor pressure is < 76.6 and the unit is complying with 40 CFR Part 63, subpart WW per § 63.2470(a)-Table 4.1.b.i. WW Tank Control = An internal floating roof is operated and maintained per 40 CFR § 63.1062(a)(1). Notification = The referencing subpart does not require notification of initial startup. Unslotted Guide Pole = The tank uses an unslotted guide pole. Wiper or Seal = The wiper or seal of the unslotted guide pole is at or above the pole wiper. Seal Configuration = Liquid-mounted seal.
19	30 TAC Chapter 115, Storage of VOCs	R5112-3	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
19	40 CFR Part 60, Subpart Kb	60KB-1	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 19,800 gallons (75,000 liters) but less than 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 2.2 psia
2202701016	30 TAC Chapter 115, Storage of VOCs	R5112-4	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons
2232701330	30 TAC Chapter 115, Storage of	R512-3	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.

Unit ID	Regulation	Index Number	Basis of Determination*
	VOCs		Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons Control Device Type = Flare
2232701330	40 CFR Part 60, Subpart Kb	60-KB-1	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 19,800 gallons (75,000 liters) but less than 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 2.2 psia
2232701334	30 TAC Chapter 115, Storage of VOCs	R5112-5	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons Control Device Type = Flare
2232701334	40 CFR Part 60, Subpart Kb	60-KB-5	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 19,800 gallons (75,000 liters) but less than 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 2.2 psia but less than 4.0 psia Storage Vessel Description = Closed vent system (CVS) with a flare used as the control device (fixed roof)
2A	30 TAC Chapter 115, Storage of VOCs	115B-1	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using an internal floating roof (IFR) True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
2A	40 CFR Part 60, Subpart K	60K-1	Construction/Modification Date = After March 8, 1974 and on or before May 19, 1978 Storage Capacity = Capacity is 40,000 gallons (151,416 liters) or less
2A	40 CFR Part 63, Subpart FFFF	63FFFF-TK1	Emission Standard = HAP vapor pressure is < 76.6 and the unit is complying with 40 CFR Part 63, subpart WW per § 63.2470(a)-Table 4.1.b.i. WW Tank Control = An internal floating roof is operated and maintained per 40 CFR § 63.1062(a)(1). Notification = The referencing subpart does not require notification of initial startup. Unslotted Guide Pole = The tank uses an unslotted guide pole. Wiper or Seal = The wiper or seal of the unslotted guide pole is at or above the pole wiper. Seal Configuration = Liquid-mounted seal.
2B	30 TAC Chapter 115, Storage of	115B-1	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable

Unit ID	Regulation	Index Number	Basis of Determination*
	VOCs		control requirements or exemption criteria. Tank Description = Tank using an internal floating roof (IFR) True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
2B	40 CFR Part 60, Subpart K	60K-1	Construction/Modification Date = After March 8, 1974 and on or before May 19, 1978 Storage Capacity = Capacity is 40,000 gallons (151,416 liters) or less
2B	40 CFR Part 63, Subpart FFFF	63FFFF-TK1	Emission Standard = HAP vapor pressure is < 76.6 and the unit is complying with 40 CFR Part 63, subpart WW per § 63.2470(a)-Table 4.1.b.i. WW Tank Control = An internal floating roof is operated and maintained per 40 CFR § 63.1062(a)(1). Notification = The referencing subpart does not require notification of initial startup. Unslotted Guide Pole = The tank uses an unslotted guide pole. Wiper or Seal = The wiper or seal of the unslotted guide pole is at or above the pole wiper. Seal Configuration = Liquid-mounted seal.
3	30 TAC Chapter 115, Storage of VOCs	R5112-3	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
3	40 CFR Part 60, Subpart K	60K-1	Construction/Modification Date = After March 8, 1974 and on or before May 19, 1978 Storage Capacity = Capacity is 40,000 gallons (151,416 liters) or less
4	30 TAC Chapter 115, Storage of VOCs	R5112-3	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
4	40 CFR Part 60, Subpart K	60K-1	Construction/Modification Date = After March 8, 1974 and on or before May 19, 1978 Storage Capacity = Capacity is 40,000 gallons (151,416 liters) or less
400A	30 TAC Chapter 115, Storage of VOCs	R5112-3	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
400A	40 CFR Part 60,	60KB-2	Product Stored = Petroleum liquid (other than petroleum or condensate)

Unit ID	Regulation	Index Number	Basis of Determination*
	Subpart Kb		Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)
400B	30 TAC Chapter 115, Storage of VOCs	R5112-4	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons
400B	40 CFR Part 60, Subpart Kb	60KB-2	Product Stored = Petroleum liquid (other than petroleum or condensate) Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)
400C	30 TAC Chapter 115, Storage of VOCs	R5112-5	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = Gasoline from a storage container in motor vehicle fuel dispensing service (as defined in 30 TAC Chapter 115) Storage Capacity = Capacity is less than 25,000 gallons
400C	40 CFR Part 60, Subpart Kb	60KB-3	Product Stored = Product stored at a gasoline service station
410A	30 TAC Chapter 115, Storage of VOCs	R5112-3	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
410A	40 CFR Part 60, Subpart Kb	60-KB-4	Product Stored = Volatile organic liquid Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)
410B	30 TAC Chapter 115, Storage of VOCs	R5112-3	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
410B	40 CFR Part 60, Subpart Kb	60-KB-4	Product Stored = Volatile organic liquid Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)
PRGH2OTNK	30 TAC Chapter 115, Storage of VOCs	R5112-6	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 25,000 gallons but less than or equal to 40,000 gallons
PRGH2OTNK	40 CFR Part 60,	60K-1	Construction/Modification Date = After March 8, 1974 and on or before May 19, 1978

Unit ID	Regulation	Index Number	Basis of Determination*
	Subpart K		Storage Capacity = Capacity is 40,000 gallons (151,416 liters) or less
305	40 CFR Part 63, Subpart FFFF	63FFFF-1	Emission Standard = A flare is being used per § 63.2475(a) - Table 5.1.b. Designated Hal = The emission stream is not designated as halogenated. Determined Hal = The emission stream is determined to be nonhalogenated. Prior Eval = The data from a prior evaluation or assessment is used. Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure. Bypass Line = The CVS does not contain any bypass line that could divert the vent stream away from the control device.
310	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-3	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline. Transfer Type = Only loading. True Vapor Pressure = True vapor pressure is less than 1.5 psia.
310	40 CFR Part 63, Subpart FFFF	63FFFF-1	Emission Standard = A flare is being used per § 63.2475(a) - Table 5.1.b. Designated Hal = The emission stream is not designated as halogenated. Determined Hal = The emission stream is determined to be nonhalogenated. Prior Eval = The data from a prior evaluation or assessment is used. Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure. Bypass Line = The CVS does not contain any bypass line that could divert the vent stream away from the control device.
GRP-MONLDG	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-3	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline. Transfer Type = Only loading. True Vapor Pressure = True vapor pressure is less than 1.5 psia.
GRP-MONLDG	40 CFR Part 63, Subpart FFFF	63FFFF-1	Emission Standard = A flare is being used per § 63.2475(a) - Table 5.1.b. Designated Hal = The emission stream is not designated as halogenated. Determined Hal = The emission stream is determined to be nonhalogenated. Prior Eval = The data from a prior evaluation or assessment is used. Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure. Bypass Line = The CVS does not contain any bypass line that could divert the vent stream away from the control device.
L-DIESELV	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-1	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline. Transfer Type = Loading and unloading.

Unit ID	Regulation	Index Number	Basis of Determination*
			True Vapor Pressure = True vapor pressure is less than 1.5 psia.
L-GAS	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-2	Chapter 115 Facility Type = Motor vehicle fuel dispensing facility
12	30 TAC Chapter 111, Visible Emissions	R1111-1	Acid Gases Only [REG I] = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. Emergency/Upset Conditions Only [REG I] = Flare is used under conditions other than emergency or upset conditions. Alternate Opacity Limitation [REG I] = Not complying with an alternate opacity limit under 30 TAC § 111.113.
12	40 CFR Part 60, Subpart A	60A-1	Subject To 40 CFR 60.18 = Flare is not subject to 40 CFR § 60.18.
12	40 CFR Part 60, Subpart A	60A-2	Subject To 40 CFR 60.18 = Flare is subject to 40 CFR § 60.18. Adhering To Heat Content Specifications = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4). Flare Assist Type [NSPS A, NESHAP A, AND/OR MACT A] = Steam-assisted Flare Exit Velocity [NSPS A, NESHAP A, AND/OR MACT A] = Flare exit velocity is less than 60 ft/s (18.3 m/sec)
12	40 CFR Part 60, Subpart A	60A-3	Subject To 40 CFR 60.18 = Flare is subject to 40 CFR § 60.18. Adhering To Heat Content Specifications = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4). Flare Assist Type [NSPS A, NESHAP A, AND/OR MACT A] = Steam-assisted Flare Exit Velocity [NSPS A, NESHAP A, AND/OR MACT A] = Flare exit velocity is greater than or equal to 60 ft/s (18.3 m/sec) but less than 400 ft/s (122 m/sec). Heating Value Of Gas [NSPS A, NESHAP A, AND/OR MACT A] = Heating value is less than or equal to 1000 Btu/scf (37.3 MJ/scm).
12	40 CFR Part 60, Subpart A	60A-4	Subject To 40 CFR 60.18 = Flare is subject to 40 CFR § 60.18. Adhering To Heat Content Specifications = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4). Flare Assist Type [NSPS A, NESHAP A, AND/OR MACT A] = Steam-assisted Flare Exit Velocity [NSPS A, NESHAP A, AND/OR MACT A] = Flare exit velocity is greater than or equal to 60 ft/s (18.3 m/sec) but less than 400 ft/s (122 m/sec). Heating Value Of Gas [NSPS A, NESHAP A, AND/OR MACT A] = Heating value is greater than 1000 Btu/scf (37.3 MJ/scm)
12	40 CFR Part 63, Subpart A	63FFFF-FLR1	Required Under 40 CFR 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 = Steam assisted Flare Exit Velocity = Flare exit velocity is less than 60 ft/s (18.3 m/sec) Heating Value Of Gas = Heating value is less than or equal to 1000 Btu/scf (37.3 MJ/scm).
12	40 CFR Part 63, Subpart A	63FFFF-FLR2	Required Under 40 CFR 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 = Steam assisted

Unit ID	Regulation	Index Number	Basis of Determination*
			Flare Exit Velocity = Flare exit velocity is less than 60 ft/s (18.3 m/sec) Heating Value Of Gas = Heating value is greater than 1000 Btu/scf (37.3 MJ/scm).
12	40 CFR Part 63, Subpart A	63FFFF-FLR3	Required Under 40 CFR 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 = Steam assisted Flare Exit Velocity = Flare exit velocity is greater than or equal to 60 ft/s (18.3 m/sec) but less than 400 ft/s (122 m/sec). Heating Value Of Gas = Heating value is greater than 1000 Btu/scf (37.3 MJ/scm).
12	40 CFR Part 63, Subpart A	63FFFF-FLR4	Required Under 40 CFR 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 = Steam assisted Flare Exit Velocity = Flare exit velocity is greater than or equal to 60 ft/s (18.3 m/sec) but less than 400 ft/s (122 m/sec). Heating Value Of Gas = Heating value is greater than 1000 Btu/scf (37.3 MJ/scm).
14	40 CFR Part 60, Subpart DDD	60DDD-1	Manufactured Product [NSPS DDD] = Polypropylene or polyethylene Continuous Process [NSPS DDD] = The affected facility is a continuous process 40 CFR 60 (NSPS) Subpart DDD Construction/Modification (Reconstruction) Date = On/before september 30, 1987
14	40 CFR Part 63, Subpart FFFF	63FFFF	Existing Source = Fugitive unit contains equipment in an existing Miscellaneous Chemical Processing Unit.
14DDD	40 CFR Part 63, Subpart FFFF	63FFFF	Existing Source = Fugitive unit contains equipment in an existing Miscellaneous Chemical Processing Unit.
ADDMELT	40 CFR Part 60, Subpart DDD	60DDD-2	Manufactured Product [NSPS DDD] = Polypropylene or polyethylene Continuous Process [NSPS DDD] = The affected facility is not a continuous process
MONHESYS	40 CFR Part 63, Subpart FFFF	63FFFF-CTW01	Monitoring = The cooling water is being monitored for the presence of HAPs or other representative substances that would indicate a leak.
GRP-SUMP	30 TAC Chapter 115, Water Separation	R5131-2	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. EXEMPTION FROM CONTROL REQUIREMENTS OF 115.132 [REG V] = Any single or multiple compartment VOC water separator which separates less than 200 gallons (757 liters) a day of materials containing VOC obtained from any equipment.
GRP-WATER	30 TAC Chapter 115, Water Separation	R5131-1	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. Exemption From Control Requirements of 115.132 [Reg V] = Any single or multiple compartment VOC water separator which is designed solely to capture stormwater, spills, or exterior surface cleanup waters and is fully covered.
11	30 TAC Chapter 115, Vent Gas Controls	R5121-2	Chapter 115 Division = The vent stream originates from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. 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. Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration = VOC concentration is less than 30,000 ppmv.</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>
GRP-007	30 TAC Chapter 115, Vent Gas Controls	R5121-2	<p>Chapter 115 Division = The vent stream originates from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration = VOC concentration is less than 30,000 ppmv.</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>
GRP-009	30 TAC Chapter 115, Vent Gas Controls	R5121-2	<p>Chapter 115 Division = The vent stream originates from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration = VOC concentration is less than 30,000 ppmv.</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>
GRP-016	30 TAC Chapter 115, Vent Gas Controls	R5121-2	<p>Chapter 115 Division = The vent stream originates from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration = VOC concentration is less than 30,000 ppmv.</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>
GRP-017	30 TAC Chapter 115, Vent Gas Controls	R5121-2	<p>Chapter 115 Division = The vent stream originates from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration = VOC concentration is less than 30,000 ppmv.</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
GRP-165	30 TAC Chapter 115, Vent Gas Controls	R5121-2	<p>Chapter 115 Division = The vent stream originates from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration = VOC concentration is less than 30,000 ppmv.</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>
GRP-200	30 TAC Chapter 115, Vent Gas Controls	R5121-2	<p>Chapter 115 Division = The vent stream originates from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration = VOC concentration is less than 30,000 ppmv.</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>
GRP-205	30 TAC Chapter 115, Vent Gas Controls	R5121-2	<p>Chapter 115 Division = The vent stream originates from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration = VOC concentration is less than 30,000 ppmv.</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>
GRP-210	30 TAC Chapter 115, Vent Gas Controls	R5121-2	<p>Chapter 115 Division = The vent stream originates from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration = VOC concentration is less than 30,000 ppmv.</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>
GRP-220	30 TAC Chapter 115, Vent Gas Controls	R5121-2	<p>Chapter 115 Division = The vent stream originates 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>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration = VOC concentration is less than 30,000 ppmv.</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>
GRP-230	30 TAC Chapter 115, Vent Gas Controls	R5121-2	<p>Chapter 115 Division = The vent stream originates from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration = VOC concentration is less than 30,000 ppmv.</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>
GRP-ATM1	30 TAC Chapter 115, Vent Gas Controls	R5121-2	<p>Chapter 115 Division = The vent stream originates from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration = VOC concentration is less than 30,000 ppmv.</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>
GRP-ATM2	30 TAC Chapter 115, Vent Gas Controls	R5121-2	<p>Chapter 115 Division = The vent stream originates from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration = VOC concentration is less than 30,000 ppmv.</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>
GRP-ATM3	30 TAC Chapter 115, Vent Gas Controls	R5121-2	<p>Chapter 115 Division = The vent stream originates from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration = VOC concentration is less than 30,000 ppmv.</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.
GRP-ATM4	30 TAC Chapter 115, Vent Gas Controls	R5121-2	<p>Chapter 115 Division = The vent stream originates from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration = VOC concentration is less than 30,000 ppmv.</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>
GRP-FVNTB1	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 originates from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Control Device Type = Smokeless flare</p> <p>Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.</p>
GRP-FVNTC1	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 originates from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Control Device Type = Smokeless flare</p> <p>Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.</p>
GRP-FVNTC1	40 CFR Part 63, Subpart FFFF	63FFFF-CVNT1	<p>Designated Grp1 = The emission stream is designated as Group 1.</p> <p>Emission Standard = The TRE index is not maintained above the threshold (5.0 for a new source and 1.9 for an existing source) and a flare is being used for control.</p> <p>Designated Hal = The emission stream is not designated as halogenated.</p> <p>Determined Hal = The emission stream is determined to be non-halogenated.</p> <p>Prior Eval = The data from a prior evaluation or assessment is used.</p> <p>Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.</p> <p>Bypass Line = The closed vent system contains no bypass line.</p>
GRP-FVNTMV	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 originates from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Control Device Type = Smokeless flare</p> <p>Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
GRP-FVNTRD	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 originates from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Control Device Type = Smokeless flare</p> <p>Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.</p>
GRP-FVNTRV	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 originates from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Control Device Type = Smokeless flare</p> <p>Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.</p>
CSC1-D1	30 TAC Chapter 115, Degreasing Processes	115-CSC1	<p>30 TAC Chapter 115 (Reg V) Solvent Degreasing Machine Type = When uncontrolled, can emit a combined weight of VOC less than 550 pounds in any consecutive 24-hr period only in Gregg Nueces or Victoria counties & claiming exemption § 115.417(b)(3)</p> <p>Alternate Control Requirement (ACR) [Reg V] = Executive Director has not approved an alternate control requirement as allowed under 30 TAC 115.413.</p>
PRO-PAINT	30 TAC Chapter 115, Surface Coating Operations	R5421-1	<p>Alternate Compliance Method [Reg V] = Alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria has not been approved</p> <p>30 TAC Chapter 115 (Reg V) Facility Operations = Other metal parts and products coating</p> <p>VOC Emission Rate [Reg V] = Uncontrolled emissions of less than 550 pounds VOC per 24-hour period</p>
PRO-BATCH1	40 CFR Part 63, Subpart FFFF	63FFFF-BVNT1	<p>Designated Grp1 = The emission stream is designated as Group 1.</p> <p>Designated HAL = The emission stream is not designated as halogenated.</p> <p>Determined HAL = The emission stream is determined not to be halogenated.</p> <p>Vent Emission Control = Reduce uncontrolled organic HAP emissions from all batch process vents within the process by venting through a closed-vent system to a flare per Table 2.1.c.</p> <p>Prior Eval = The data from a prior evaluation or assessment is used.</p> <p>Negative Pressure = The closed vent system is operated and maintained at atmospheric pressure.</p> <p>Bypass Line = The closed vent system does not contain a bypass line that could divert the vent stream away from the control device.</p>
PRO-GRP-009	40 CFR Part 63, Subpart FFFF	63FFFF-BVNT1	<p>Designated Grp1 = The emission stream is designated as Group 1.</p> <p>Designated HAL = The emission stream is not designated as halogenated.</p> <p>Determined HAL = The emission stream is determined not to be halogenated.</p> <p>Vent Emission Control = Reduce uncontrolled organic HAP emissions from all batch process vents within the process by venting through a closed-vent system to a flare per Table 2.1.c.</p> <p>Prior Eval = The data from a prior evaluation or assessment is used.</p> <p>Negative Pressure = The closed vent system is operated and maintained at atmospheric pressure.</p> <p>Bypass Line = The closed vent system does not contain a bypass line that could divert the vent stream away from the control device.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
PRO-GRP-FVNTB1	40 CFR Part 63, Subpart FFFF	63FFFF-BVNT1	<p>Designated Grp1 = The emission stream is designated as Group 1.</p> <p>Designated HAL = The emission stream is not designated as halogenated.</p> <p>Determined HAL = The emission stream is determined not to be halogenated.</p> <p>Vent Emission Control = Reduce uncontrolled organic HAP emissions from all batch process vents within the process by venting through a closed-vent system to a flare per Table 2.1.c.</p> <p>Prior Eval = The data from a prior evaluation or assessment is used.</p> <p>Negative Pressure = The closed vent system is operated and maintained at atmospheric pressure.</p> <p>Bypass Line = The closed vent system does not contain a bypass line that could divert the vent stream away from the control device.</p>
PRO-GRP-FVNTMV	40 CFR Part 63, Subpart FFFF	63FFFF-BVNT1	<p>Designated Grp1 = The emission stream is designated as Group 1.</p> <p>Designated HAL = The emission stream is not designated as halogenated.</p> <p>Determined HAL = The emission stream is determined not to be halogenated.</p> <p>Vent Emission Control = Reduce uncontrolled organic HAP emissions from all batch process vents within the process by venting through a closed-vent system to a flare per Table 2.1.c.</p> <p>Prior Eval = The data from a prior evaluation or assessment is used.</p> <p>Negative Pressure = The closed vent system is operated and maintained at atmospheric pressure.</p> <p>Bypass Line = The closed vent system does not contain a bypass line that could divert the vent stream away from the control device.</p>
PRO-POLY	40 CFR Part 63, Subpart FFFF	63FFFF-PRO1	<p>>1000 lb/yr = The process has uncontrolled hydrogen halide and halogen HAP emissions from process vents of less than 1,000 lb/yr.</p> <p>Ammonium Sulfate = The MCPU does not include the manufacture of ammonium sulfate as a by-product, or the slurry entering the by-product manufacturing process contains 50 parts per million by weight (ppmw) HAP or less or 10 ppmw benzene or less.</p> <p>Startup 2003 = The affected source startup was before November 10, 2003.</p> <p>Other Operations = The MCPU includes operations other than those listed in § 63.2435(c).</p> <p>Shared Batch Vent = The MCPU includes a batch process vent that also is part of a CMPU as defined in subparts F and G of this part 63.</p> <p>63.100 CMPU = The MCPU is a CMPU defined in § 63.100.</p> <p>New Source = The MCPU is an existing affected source.</p> <p>PUG = The MCPU is not part of a process unit group (PUG).</p> <p>Startup 2002 = The affected source initial startup was before April 4, 2002.</p> <p>PP Alt = The MCPU is complying with the emission limitations and work practice standards contained in Tables 1 through 7.</p> <p>Cont Proc = The MCPU process is continuous.</p> <p>Batch Process Vents = The source does not include batch process vents.</p>
PRO-POLY	40 CFR Part 63, Subpart FFFF	63FFFF-PRO2	<p>>1000 lb/yr = The process has uncontrolled hydrogen halide and halogen HAP emissions from process vents of less than 1,000 lb/yr.</p> <p>Ammonium Sulfate = The MCPU does not include the manufacture of ammonium sulfate as a by-product, or the slurry entering the by-product manufacturing process contains 50 parts per million by weight (ppmw) HAP or less or 10 ppmw benzene or less.</p> <p>Startup 2003 = The affected source startup was before November 10, 2003.</p> <p>Other Operations = The MCPU includes operations other than those listed in § 63.2435(c).</p> <p>Shared Batch Vent = The MCPU includes a batch process vent that also is part of a CMPU as defined in subparts F and G of this part 63.</p> <p>63.100 CMPU = The MCPU is a CMPU defined in § 63.100.</p> <p>New Source = The MCPU is an existing affected source.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>PUG = The MCPU is not part of a process unit group (PUG).</p> <p>Startup 2002 = The affected source initial startup was before April 4, 2002.</p> <p>PP Alt = The MCPU is complying with the emission limitations and work practice standards contained in Tables 1 through 7.</p> <p>Cont Proc = The MCPU process is not continuous.</p> <p>Batch Process Vents = The source includes batch process vents.</p>

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

NSR Versus Title V FOP

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

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

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

New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. The

Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

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

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html

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

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.: 811B	Issuance Date: 01/30/2014
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.103	Version No./Date: 09/04/2000
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.262	Version No./Date: 11/01/2003
Number: 106.263	Version No./Date: 09/04/2000
Number: 106.373	Version No./Date: 09/04/2000
Number: 106.433	Version No./Date: 03/14/1997
Number: 106.454	Version No./Date: 11/01/2001
Number: 106.472	Version No./Date: 09/04/2000
Number: 106.478	Version No./Date: 09/04/2000
Number: 51	Version No./Date: 09/12/1989
Number: 53	Version No./Date: 09/12/1989
Number: 111	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 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.: 1	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: 115B-1
Pollutant: VOC	Main Standard: § 115.112(b)(1)
Monitoring Information	
Indicator: Internal Floating Roof	
Minimum Frequency: annually	
Averaging Period: n/a	
Deviation Limit: Any monitoring data in which the roof is not floating on the surface of the VOC, if liquid has accumulated on the internal floating roof, the seals are detached, or if there are holes or tears in the seal fabric shall be reported as a deviation.	
<p>Basis of monitoring:</p> <p>The option to monitor VOC emissions by visually inspecting the external floating roof or the internal floating roof was included as an option by the EPA in the “Periodic Monitoring Technical Reference Document” (April 1999) to monitor VOC sources. If the external or internal floating roof is operating in accordance with its design it will meet its control efficiency. Visually inspecting the external floating roof or the internal floating roof is commonly required in federal and state rules, including: 40 CFR Part 60, Subpart Kb; 40 CFR Part 61, Subpart Y; and 30 TAC Chapter 115. Measuring and recording the accumulated area of gaps if the tank is equipped with primary seals is commonly required in federal and state rules, including: 40 CFR Part 60, Subpart Kb; 40 CFR Part 61, Subpart Y; 40 CFR 63 Subparts VV, DD, and MMM; and 30 TAC Chapter 115.</p>	

Unit/Group/Process Information	
ID No.: 2A	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: 115B-1
Pollutant: VOC	Main Standard: § 115.112(b)(1)
Monitoring Information	
Indicator: Internal Floating Roof	
Minimum Frequency: annually	
Averaging Period: n/a	
Deviation Limit: Any monitoring data in which the roof is not floating on the surface of the VOC, if liquid has accumulated on the internal floating roof, the seals are detached, or if there are holes or tears in the seal fabric shall be reported as a deviation.	
<p>Basis of monitoring:</p> <p>The option to monitor VOC emissions by visually inspecting the external floating roof or the internal floating roof was included as an option by the EPA in the “Periodic Monitoring Technical Reference Document” (April 1999) to monitor VOC sources. If the external or internal floating roof is operating in accordance with its design it will meet its control efficiency. Visually inspecting the external floating roof or the internal floating roof is commonly required in federal and state rules, including: 40 CFR Part 60, Subpart Kb; 40 CFR Part 61, Subpart Y; and 30 TAC Chapter 115. Measuring and recording the accumulated area of gaps if the tank is equipped with primary seals is commonly required in federal and state rules, including: 40 CFR Part 60, Subpart Kb; 40 CFR Part 61, Subpart Y; 40 CFR 63 Subparts VV, DD, and MMM; and 30 TAC Chapter 115.</p>	

Unit/Group/Process Information	
ID No.: 2B	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: 115B-1
Pollutant: VOC	Main Standard: § 115.112(b)(1)
Monitoring Information	
Indicator: Internal Floating Roof	
Minimum Frequency: annually	
Averaging Period: n/a	
Deviation Limit: Any monitoring data in which the roof is not floating on the surface of the VOC, if liquid has accumulated on the internal floating roof, the seals are detached, or if there are holes or tears in the seal fabric shall be reported as a deviation.	
<p>Basis of monitoring: The option to monitor VOC emissions by visually inspecting the external floating roof or the internal floating roof was included as an option by the EPA in the "Periodic Monitoring Technical Reference Document" (April 1999) to monitor VOC sources. If the external or internal floating roof is operating in accordance with its design it will meet its control efficiency. Visually inspecting the external floating roof or the internal floating roof is commonly required in federal and state rules, including: 40 CFR Part 60, Subpart Kb; 40 CFR Part 61, Subpart Y; and 30 TAC Chapter 115. Measuring and recording the accumulated area of gaps if the tank is equipped with primary seals is commonly required in federal and state rules, including: 40 CFR Part 60, Subpart Kb; 40 CFR Part 61, Subpart Y; 40 CFR 63 Subparts VV, DD, and MMM; and 30 TAC Chapter 115.</p>	

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