

# Statement of Basis of the Federal Operating Permit

Johns Manville

Site Name: Cleburne Plant  
Physical Location: 200 W Industrial Blvd  
Nearest City: Cleburne  
County: Johnson

Permit Number: O1677  
Project Type: Renewal

Standard Industrial Classification (SIC) Code: 3296  
SIC Name: Mineral Wool

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

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

Prepared on: June 16, 2016

## Operating Permit Basis of Determination

### Permit Area Process Description

Four types of fiberglass production are utilized at the Cleburne facility:

**I. E-Glass Production** - Raw materials are fed into the E-glass line by means of a batch feeder. The materials are blended and melted before being pulled into strands. The strands are conditioned (cooled slowly) and cut to the desired lengths before being packaged and shipped to customers.

**II. Marble Production** - Raw materials are fed into the Marble Production process via batch feeder, blended and melted before being formed into marbles. The marbles are cooled before being sent to other facility processes or shipped off-site.

**III. Pot and Marble Fiberglass Production** - Marbles from the previous process are re-melted and pulled into fibers. The fibers are cooled and formed into a fiberglass mat before being packaged.

**IV. HERM Fiberglass Manufacturing Process** - Raw materials are blended and fed into the furnaces of the Horizontal Electric Rotary Melt (HERM) process. Fibers are pulled directly from the furnaces and spun into a wool fiberglass mat. The fiberglass mat is formed into the desired thickness before being cut and packaged for shipping.

### 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, PM, NOX, HAPS, CO
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### Reading State of Texas’s Federal Operating Permit

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

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

- General Terms and Conditions
- Special Terms and Conditions
  - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
  - Additional Monitoring Requirements
  - New Source Review Authorization Requirements
  - Compliance Requirements
  - Protection of Stratosphere Ozone
  - Permit Location
  - Permit Shield (30 TAC § 122.148)

- Attachments
  - Applicable Requirements Summary
    - Unit Summary
    - Applicable Requirements Summary
  - Additional Monitoring Requirements
  - Permit Shield
  - New Source Review Authorization References
  - Compliance Plan
  - Alternative Requirements
- Appendix A
  - Acronym list
- Appendix B
  - Copies of major NSR authorizations

## General Terms and Conditions

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

## Special Terms and Conditions

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

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

## Attachments

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

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

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When

necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

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

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

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

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

#### Appendix A

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

#### Appendix B

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

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

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed either before or 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.(iv) 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)	Yes
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	No
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	Yes
CAIR (Clean Air Interstate Rule)	No

**Basis for Applying Permit Shields**

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

**Insignificant Activities**

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

1. Office activities such as photocopying, blueprint copying, and photographic processes.
2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
4. Outdoor barbecue pits, campfires, and fireplaces.
5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
9. Vehicle exhaust from maintenance or repair shops.
10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
15. Well cellars.
16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
18. Equipment used exclusively for the melting or application of wax.
19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
20. Shell core and shell mold manufacturing machines.
21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
22. Equipment used for inspection of metal products.
23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
25. Battery recharging areas.
26. Brazing, soldering, or welding equipment.

### **Determination of Applicable Requirements**

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

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at [www.tceq.texas.gov/permitting/air/nav/air\\_supportsys.html](http://www.tceq.texas.gov/permitting/air/nav/air_supportsys.html). The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

#### Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

## Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
F902	40 CFR Part 63, Subchapter NNN	63NNN-902	MANUFACTURES WOOL FIBERGLASS INSULATION [MACT NNN] = FACILITY IS AN EXISTING GLASS MELTING FURNACE CONTROL DEVICE [MACT NNN] = ELECTROSTATIC PRECIPITATOR (ESP)	The rule citations were determined from an analysis of the rule text and the basis of determination.
F91A	40 CFR Part 63, Subchapter NNN	63NNN-F91A	MANUFACTURES WOOL FIBERGLASS INSULATION [MACT NNN] = FACILITY IS AN EXISTING GLASS MELTING FURNACE CONTROL DEVICE [MACT NNN] = BAGHOUSE	The rule citations were determined from an analysis of the rule text and the basis of determination.
F91B	40 CFR Part 63, Subchapter NNN	63NNN-F91B	MANUFACTURES WOOL FIBERGLASS INSULATION [MACT NNN] = FACILITY IS AN EXISTING GLASS MELTING FURNACE CONTROL DEVICE [MACT NNN] = BAGHOUSE	The rule citations were determined from an analysis of the rule text and the basis of determination.
PRO-LINE91	40 CFR Part 63, Subchapter JJJJ	63JJJJ	PAPER/WEB COATING OPERATION = FACILITY IS MAJOR FOR 112(B)HAPS, ALTHOUGH WEB COATING OPERATION USES NO 112(B)HAP MATERIALS. CONTROL DEVICE [MACT JJJJ] = NOT REQUIRED (RECORDKEEPING ONLY)	The rule citations were determined from an analysis of the rule text and the basis of determination.
GEN1	30 TAC Chapter 117, Subchapter B	R7400	Horsepower Rating = Horsepower rating is 50 hp or greater Type of Service = Existing diesel fuel-fired engine, located in the Dallas/Fort Worth Eight-Hour ozone nonattainment area, operated less than 100 hours/year, on a rolling 12-month average that has not been modified, reconstructed or relocated on or after June 1, 2007	
GEN1	40 CFR Part 60, Subpart IIII	60IIII	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification on or before July 11, 2005.	
GEN1	40 CFR Part 63, Subpart ZZZZ	63ZZZZ	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2. Brake HP = Stationary RICE with a brake HP greater than 500 HP. Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002. Service Type = Emergency use where the RICE does not operate or is not contractually obligated to be available for more than 15 hours per calendar year as specified in 40 CFR §63.6640(f)(2)(ii)-(iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii).	
GEN2	30 TAC Chapter 117, Subchapter B	R7400	Horsepower Rating = Horsepower rating is 50 hp or greater Type of Service = Existing diesel fuel-fired engine, located in the Dallas/Fort Worth Eight-Hour ozone nonattainment area, operated less than 100 hours/year, on a rolling 12-month average that has not been modified, reconstructed or relocated on or after June 1, 2007	
GEN2	40 CFR Part 60, Subpart IIII	60IIII	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification on or before July 11, 2005.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
GEN2	40 CFR Part 63, Subpart ZZZZ	63ZZZZ	<p>HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.</p> <p>Brake HP = Stationary RICE with a brake HP greater than 500 HP.</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.</p> <p>Service Type = Emergency use where the RICE does not operate or is not contractually obligated to be available for more than 15 hours per calendar year as specified in 40 CFR §63.6640(f)(2)(ii)-(iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii).</p>	
GRPSMALL	30 TAC Chapter 115, Storage of VOCs	R5112	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is less than or equal to 1,000 gallons</p>	
GRPTANK	30 TAC Chapter 115, Storage of VOCs	R5112	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p> <p>Potential to Emit = The uncontrolled VOC emissions from the individual tank, or from the aggregate of storage tanks in a tank battery, is less than 50 tons per year.</p>	
TK-LFC1	40 CFR Part 60, Subpart Kb	60Kb-LFC	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)</p>	
TK-LFC2	40 CFR Part 60, Subpart Kb	60Kb-LFC	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)</p>	
F901	30 TAC Chapter 117, Subchapter B	R7400	<p>Fuel Flow Monitoring = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.340(a) or 117.440(a).</p> <p>Unit Type = Mineral wool-type fiberglass non-regenerative gas-fired furnace</p> <p>CO Emission Limitation = Title 30 TAC § 117.410(d)(1)</p> <p>Maximum Rate Capacity = MRC is greater than 40 MMBtu/hr but less than 100 MMBtu/hr</p> <p>CO Monitoring System = Emissions are monitored using a method other than a CEMS or PEMS.</p> <p>NOx Emission Limitation = Title 30 TAC § 117.410(b)(8) or (b)(10)</p> <p>NOx Emission Limit Basis = Emission limit in lb/hr (or ppm by volume at 15% oxygen, dry basis) on a block one-hour average</p> <p>NOx Reduction = No NO<sub>x</sub> control method</p> <p>NOx Monitoring System = Maximum emission rate testing [in accordance with 30 TAC § 117.8000]</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
F902	30 TAC Chapter 117, Subchapter B	R7400	<p>Fuel Flow Monitoring = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.340(a) or 117.440(a).</p> <p>Unit Type = Mineral wool-type fiberglass non-regenerative gas-fired furnace</p> <p>CO Emission Limitation = Title 30 TAC § 117.410(d)(1)</p> <p>Maximum Rate Capacity = MRC is greater than 20 MMBtu/hr but less than 40 MMBtu/hr</p> <p>CO Monitoring System = Emissions are monitored using a method other than a CEMS or PEMS.</p> <p>NOx Emission Limitation = Title 30 TAC § 117.410(b)(8) or (b)(10)</p> <p>NOx Emission Limit Basis = Emission limit in lb/hr (or ppm by volume at 15% oxygen, dry basis) on a block one-hour average</p> <p>NOx Reduction = No NO<sub>x</sub> control method</p> <p>NOx Monitoring System = Maximum emission rate testing [in accordance with 30 TAC § 117.8000]</p>	
FHFUG	30 TAC Chapter 117, Subchapter B	R7400	<p>Fuel Flow Monitoring = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.340(a) or 117.440(a).</p> <p>Unit Type = Mineral wool-type fiberglass non-regenerative gas-fired furnace</p> <p>CO Emission Limitation = Title 30 TAC § 117.410(d)(1)</p> <p>Maximum Rate Capacity = MRC is greater than 2 MMBtu/hr but less than 20 MMBtu/hr</p> <p>CO Monitoring System = Emissions are monitored using a method other than a CEMS or PEMS.</p> <p>NOx Emission Limitation = Title 30 TAC § 117.410(b)(8) or (b)(10)</p> <p>NOx Emission Limit Basis = Emission limit in lb/hr (or ppm by volume at 15% oxygen, dry basis) on a block one-hour average</p> <p>NOx Reduction = No NO<sub>x</sub> control method</p> <p>NOx Monitoring System = Maximum emission rate testing [in accordance with 30 TAC § 117.8000]</p>	
FHFUG2	30 TAC Chapter 117, Subchapter B	R7400	<p>Unit Type = Mineral wool-type fiberglass non-regenerative gas-fired furnace</p> <p>Maximum Rate Capacity = MRC is less than or equal to 2 MMBtu/hr</p>	
GRP-COOL	40 CFR Part 63, Subpart Q	63Q-COOL	Used Compounds Containing Chromium on or After September 8, 1994 = The industrial process cooling tower has not used compounds containing chromium on or after September 8, 1994.	
16	30 TAC Chapter 115, Vent Gas Controls	R5121	<p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
17	30 TAC Chapter 115, Vent Gas Controls	R5121	<p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>	
18	30 TAC Chapter 115, Vent Gas Controls	R5121	<p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>	
19	30 TAC Chapter 115, Vent Gas Controls	R5121	<p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
20	30 TAC Chapter 115, Vent Gas Controls	R512	<p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is greater than 100 pounds (45.4 kg).</p> <p>VOC Concentration = VOC concentration is less than 612 ppmv.</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>	
PRO-LINE92	30 TAC Chapter 115, Vent Gas Controls	R5121	<p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>	
PRO-LINE93	30 TAC Chapter 115, Vent Gas Controls	R5121	<p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
PRO-LINE90	30 TAC Chapter 115, Surface Coating Operations	R5421	Alternative Compliance Method = No alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria has been approved by the TCEQ Executive Director or no such alternate has been requested.  Facility Operations = Fabric coating.  VOC Emission Rate = All surface coating operations on a property, when uncontrolled, emit a combined weight of less than 100 lb/24-hr period of VOC and approval per 30 TAC § 115.427(a)(3)(B) has been received.	
PRO-LINE91	30 TAC Chapter 115, Surface Coating Operations	R5421	Alternative Compliance Method = No alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria has been approved by the TCEQ Executive Director or no such alternate has been requested.  Facility Operations = Paper coating.  VOC Emission Rate = All surface coating operations on a property, when uncontrolled, emit a combined weight of less than 100 lb/24-hr period of VOC and approval per 30 TAC § 115.427(a)(3)(B) has been received.	
PRO-LINE97	30 TAC Chapter 115, Surface Coating Operations	R5421	Alternative Compliance Method = No alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria has been approved by the TCEQ Executive Director or no such alternate has been requested.  Facility Operations = Fabric coating.  VOC Emission Rate = All surface coating operations on a property, when uncontrolled, emit a combined weight of less than 100 lb/24-hr period of VOC and approval per 30 TAC § 115.427(a)(3)(B) has been received.	
PRO-LINE91	40 CFR Part 60, Subpart PPP	60PPP	Manufactures Rotary Spin Wool Fiberglass Insulation = The facility is a rotary spin wool fiberglass insulation manufacturing line.  Construction/Modification Date = After February 7, 1984.  Control Device = Wet scrubber.	
PRO-LINE92	40 CFR Part 60, Subpart PPP	63PPP	Manufactures Rotary Spin Wool Fiberglass Insulation = The facility is not a rotary spin wool fiberglass insulation manufacturing line.	
PRO-LINE93	40 CFR Part 60, Subpart PPP	63PPP	Manufactures Rotary Spin Wool Fiberglass Insulation = The facility is not a rotary spin wool fiberglass insulation manufacturing line.	
F901	40 CFR Part 60, Subpart CC	60CC	Facility Type = Glass melting furnace as defined in 40 CFR Part 60, Subpart CC with a design capacity of 4550 kg/day or greater.  Construction/Modification Date = After June 15, 1979.  Modified Process = The affected facility is not a modified process glass melting furnace.  Simultaneous Firing = The furnace fires only gaseous fuel or only liquid fuel.  Complying with § 60.292 = Choosing to comply with the provisions of 40 CFR § 60.292.	
F902	40 CFR Part 60, Subpart CC	60CC	Facility Type = Glass melting furnace as defined in 40 CFR Part 60, Subpart CC with a design capacity of 4550 kg/day or greater.  Construction/Modification Date = On or before June 15, 1979.	
F91A	40 CFR Part 60, Subpart CC	60CC	Facility Type = All electric melter.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
F91B	40 CFR Part 60, Subpart CC	60CC	Facility Type = All electric melter.	
90OVEN	30 TAC Chapter 117, Subchapter B	R7400	Unit Type = Oven or heater Maximum Rated Capacity = MRC is 5 MMBtu/hr or less Fuel Fired = The oven, heater, or dryer is fired with natural gas.	
92TRNPOT	30 TAC Chapter 117, Subchapter B	R7400	Unit Type = Oven or heater Maximum Rated Capacity = MRC is 5 MMBtu/hr or less Fuel Fired = The oven, heater, or dryer is fired with natural gas.	
9701	30 TAC Chapter 117, Subchapter B	R7400	Unit Type = Curing oven used for the production of mineral wool-type or textile type fiberglass. Maximum Rated Capacity = MRC is 5 MMBtu/hr or less	
9702	30 TAC Chapter 117, Subchapter B	R7400	Unit Type = Curing oven used for the production of mineral wool-type or textile type fiberglass. Maximum Rated Capacity = MRC is 5 MMBtu/hr or less	
DRYTUNFUG	30 TAC Chapter 117, Subchapter B	R7400	Unit Type = Oven or heater Maximum Rated Capacity = MRC is 5 MMBtu/hr or less Fuel Fired = The oven, heater, or dryer is fired with natural gas.	
FG92-CF	30 TAC Chapter 117, Subchapter B	R7400	Fuel Flow Monitoring = Fuel flow is with a totalizing fuel flow meter per 30 TAC §§ 117.340(a) or 117.440(a). Unit Type = Kiln, dryer or oven such as fiberglass forming oven or heater used exclusively for comfort heat in area of occupancy that are not regulated by the rule. CO Emission Limitation = Complying with 30 TAC § 117.410(d)(1) CO Monitoring System = Sampling CO with a portable analyzer under 30 TAC § 117.8120(2).	
FG92-CO	30 TAC Chapter 117, Subchapter B	R7400	Unit Type = Curing oven used for the production of mineral wool-type or textile type fiberglass. Maximum Rated Capacity = MRC is 5 MMBtu/hr or less	
FG93-CF	30 TAC Chapter 117, Subchapter B	R7400	Fuel Flow Monitoring = Fuel flow is with a totalizing fuel flow meter per 30 TAC §§ 117.340(a) or 117.440(a). Unit Type = Kiln, dryer or oven such as fiberglass forming oven or heater used exclusively for comfort heat in area of occupancy that are not regulated by the rule. CO Emission Limitation = Complying with 30 TAC § 117.410(d)(1) CO Monitoring System = Sampling CO with a portable analyzer under 30 TAC § 117.8120(2).	
FG93-CO	30 TAC Chapter 117, Subchapter B	R7400	Unit Type = Curing oven used for the production of mineral wool-type or textile type fiberglass. Maximum Rated Capacity = MRC is 5 MMBtu/hr or less	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
FH-EAST	30 TAC Chapter 117, Subchapter B	R7400	Unit Type = Oven or heater Maximum Rated Capacity = MRC is 5 MMBtu/hr or less Fuel Fired = The oven, heater, or dryer is fired with natural gas.	
FH-WEST	30 TAC Chapter 117, Subchapter B	R7400	Unit Type = Oven or heater Maximum Rated Capacity = MRC is 5 MMBtu/hr or less Fuel Fired = The oven, heater, or dryer is fired with natural gas.	
FMFUG	30 TAC Chapter 117, Subchapter B	R7400	Unit Type = Oven or heater Maximum Rated Capacity = MRC is 5 MMBtu/hr or less Fuel Fired = The oven, heater, or dryer is fired with natural gas.	
HEAT1	30 TAC Chapter 117, Subchapter B	R7400	Unit Type = Oven or heater Maximum Rated Capacity = MRC is 5 MMBtu/hr or less Fuel Fired = The oven, heater, or dryer is fired with natural gas.	
LHT	30 TAC Chapter 117, Subchapter B	R7400	Unit Type = Oven or heater Maximum Rated Capacity = MRC is 5 MMBtu/hr or less Fuel Fired = The oven, heater, or dryer is fired with natural gas.	
MARBLELEHR	30 TAC Chapter 117, Subchapter B	R7400	Unit Type = Oven or heater Maximum Rated Capacity = MRC is 5 MMBtu/hr or less Fuel Fired = The oven, heater, or dryer is fired with natural gas.	
PRO-LINE91	30 TAC Chapter 117, Subchapter B	R7400	Unit Type = Curing oven used for the production of mineral wool-type or textile type fiberglass. Maximum Rated Capacity = MRC is 5 MMBtu/hr or less	
RNGBRNR	30 TAC Chapter 117, Subchapter B	R7400	Unit Type = Curing oven used for the production of mineral wool-type or textile type fiberglass. Maximum Rated Capacity = MRC is greater than 5 MMBtu/hr but less than 100 MMBtu/hr. N-Bound = The curing oven uses nitrogen-bound chemical additives.	

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

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

## NSR Versus Title V FOP

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

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

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

## New Source Review Requirements

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

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

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

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

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

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

[www.tceq.texas.gov/permitting/air/nav/air\\_status\\_permits.html](http://www.tceq.texas.gov/permitting/air/nav/air_status_permits.html)

<b>Prevention of Significant Deterioration (PSD) Permits</b>	
PSD Permit No.: PSDTX1025M1	Issuance Date: 06/08/2015
<b>Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.</b>	
Authorization No.: 130233	Issuance Date: 02/23/2015
Authorization No.: 946A	Issuance Date: 06/08/2015
<b>Permits By Rule (30 TAC Chapter 106) for the Application Area</b>	
Number: 106.144	Version No./Date: 09/04/2000
Number: 106.183	Version No./Date: 09/04/2000
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.262	Version No./Date: 09/04/2000
Number: 106.262	Version No./Date: 11/01/2003
Number: 106.371	Version No./Date: 09/04/2000
Number: 106.418	Version No./Date: 09/04/2000
Number: 106.433	Version No./Date: 09/04/2000
Number: 106.454	Version No./Date: 09/04/2000
Number: 106.472	Version No./Date: 09/04/2000
Number: 106.473	Version No./Date: 09/04/2000
Number: 106.476	Version No./Date: 09/04/2000
Number: 106.478	Version No./Date: 09/04/2000
Number: 106.511	Version No./Date: 09/04/2000
Number: 106.532	Version No./Date: 09/04/2000
Number: 51	Version No./Date: 09/12/1989

### **Emission Units and Emission Points**

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in

the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

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

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

**Monitoring Sufficiency**

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

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

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

**Compliance Assurance Monitoring (CAM):**

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

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

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

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

<b>Unit/Group/Process Information</b>	
ID No.: F901	
Control Device ID No.: 15A	Control Device Type: Wet or Dry Electrostatic Precipitator

<b>Applicable Regulatory Requirement</b>	
Name: 40 CFR Part 60, Subpart CC	SOP Index No.: 60CC
Pollutant: PM	Main Standard: § 60.292(a)(1)
<b>Monitoring Information</b>	
Indicator: Secondary Voltage	
Minimum Frequency: once per day	
Averaging Period: n/a*	
Deviation Limit: 2 fields operational: minimum secondary voltage for both fields = 36kV. 3 fields operational: one field minimum secondary voltage = 36kV; two remaining minimum secondary voltage = 30kV.	
Basis of CAM: The option to monitor the secondary voltage is provided since maintaining a minimum secondary voltage will help ensure proper operation of each field in order to remove particulate emissions.	

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

<b>Unit/Group/Process Information</b>	
ID No.: F901	
Control Device ID No.: 15A	Control Device Type: Wet or Dry Electrostatic Precipitator
<b>Applicable Regulatory Requirement</b>	
Name: 40 CFR Part 60, Subpart CC	SOP Index No.: 60CC
Pollutant: PM	Main Standard: § 60.292(a)(1)
<b>Monitoring Information</b>	
Indicator: Secondary Current	
Minimum Frequency: once per day	
Averaging Period: n/a*	
Deviation Limit: 2 fields operational: secondary current for both fields between 36mA and 690mA. 3 fields operational: secondary current between 170mA and 690mA.	
Basis of CAM: The option to monitor the secondary current is provided since a high or low current may be indicative of several problems including high or low resistivity, misalignment, component failure, insulator leakage, etc.	

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

**Periodic Monitoring:**

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

<b>Unit/Group/Process Information</b>	
ID No.: PRO-LINE91	
Control Device ID No.: 16	Control Device Type: Wet Scrubber
Control Device ID No.: 17	Control Device Type: Wet Scrubber
Control Device ID No.: 18	Control Device Type: Wet Scrubber
Control Device ID No.: 19	Control Device Type: Wet Scrubber
Control Device ID No.: 20	Control Device Type: Wet Scrubber
<b>Applicable Regulatory Requirement</b>	
Name: 40 CFR Part 60, Subpart PPP	SOP Index No.: 60PPP
Pollutant: PM	Main Standard: 60.682
<b>Monitoring Information</b>	
Indicator: Pressure Drop	
Minimum Frequency: Once per week	
Averaging Period: n/a*	
Deviation Limit: Minimum pressure drop (16, 17, 18, 19) = 4.66 inches; minimum pressure drop (20) = 12.86 inches	
Basis of monitoring: A common way to control particulate emissions is by use of a wet scrubber. The option to monitor pressure drop and liquid flow rate may indicate malfunctions in the liquid pumping equipment, blockage of pipes or spray nozzles or the need to adjust the variable throat opening (if applicable). This type monitoring for wet scrubbers is commonly required in federal rules including 40 CFR Part 60, Subparts Y, HH, LL, NN, OOO, and PPP.	

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

<b>Unit/Group/Process Information</b>	
ID No.: PRO-LINE91	
Control Device ID No.: 16	Control Device Type: Wet Scrubber
Control Device ID No.: 17	Control Device Type: Wet Scrubber
Control Device ID No.: 18	Control Device Type: Wet Scrubber
Control Device ID No.: 19	Control Device Type: Wet Scrubber
Control Device ID No.: 20	Control Device Type: Wet Scrubber
<b>Applicable Regulatory Requirement</b>	
Name: 40 CFR Part 60, Subpart PPP	SOP Index No.: 60PPP
Pollutant: PM	Main Standard: 60.682
<b>Monitoring Information</b>	
Indicator: Liquid Flow Rate	
Minimum Frequency: Once per week	
Averaging Period: n/a*	
Deviation Limit: Minimum liquid flow rate = 375 gpm	
<p>Basis of monitoring:  A common way to control particulate emissions is by use of a wet scrubber. The option to monitor pressure drop and liquid flow rate may indicate malfunctions in the liquid pumping equipment, blockage of pipes or spray nozzles or the need to adjust the variable throat opening (if applicable). This type monitoring for wet scrubbers is commonly required in federal rules including 40 CFR Part 60, Subparts Y, HH, LL, NN, OOO, and PPP.</p>	

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

**Compliance Review**

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on June 16, 2016.

Site rating: 0.80 / Satisfactory Company rating: 0.80 / Satisfactory

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

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

**Site/Permit Area Compliance Status Review**

1. Were there any out-of-compliance units listed on Form OP-ACPS? .....No

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

**Available Unit Attribute Forms**

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

OP-UA47 - Ship Building and Ship Repair Unit Attributes  
OP-UA48 - Air Oxidation Unit Process Attributes  
OP-UA49 - Vacuum-Producing System Attributes  
OP-UA50 - Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes  
OP-UA51 - Dryer/Kiln/Oven Attributes  
OP-UA52 - Closed Vent Systems and Control Devices  
OP-UA53 - Beryllium Processing Attributes  
OP-UA54 - Mercury Chlor-Alkali Cell Attributes  
OP-UA55 - Transfer System Attributes  
OP-UA56 - Vinyl Chloride Process Attributes  
OP-UA57 - Cleaning/Depainting Operation Attributes  
OP-UA58 - Treatment Process Attributes  
OP-UA59 - Coke By-Product Recovery Plant Attributes  
OP-UA60 - Chemical Manufacturing Process Unit Attributes  
OP-UA61 - Pulp, Paper, or Paperboard Producing Process Attributes  
OP-UA62 - Glycol Dehydration Unit Attributes  
OP-UA63 - Vegetable Oil Production Attributes