

Statement of Basis of the Federal Operating Permit

Celanese Ltd.

Site Name: Celanese Bay City Plant
Area Name: Bay City Plant
Physical Location: 2001 FM 3057
Nearest City: Bay City
County: Matagorda

Permit Number: O1628
Project Type: Renewal

The North American Industry Classification System (NAICS) Code: 325199
NAICS Name: All Other Basic Organic Chemical Manufacturing

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: April 30, 2024

Operating Permit Basis of Determination

Permit Area Process Description

The plant is comprised of the following sections:

Utilities Unit

The main activities undertaken in the Utilities Unit consist of the following:

1. Process water treatment and steam production
2. Cooling tower operations
3. Synthesis gas and hydrogen production for use by process units
4. Waste stream collection, treatment, & destruction
5. Storage of fuels for dispensing operations for site equipment and vehicles

Vinyl Acetate Manufacturing:

The manufacturing of vinyl acetate involves four process steps:

1. A vapor phase reaction occurs in which ethylene, oxygen, and acetic acid are fed into a reactor which produces the raw vinyl acetate.
2. After the reaction occurs, the heavy ends are removed and sent to an acetic acid vaporizer. The vapors are sent to a distillation column in which acetic acid is removed and stored while the remaining heavy ends are sent to the utility's boilers.
3. Excess CO₂ is removed from the reaction by use of a CO₂ scrubber and absorber. The CO₂ is removed in order to maintain the proper ethylene concentration in the reactor feed.
4. Purification of the raw vinyl acetate occurs by feeding raw vinyl acetate into an azeotrope column. Ethyl acetate drops to the bottom of the column and is sent to the utility's boilers. The light ends (top of the column) is sent through a series of columns to remove impurities and water. The final product is stored in a series of tanks. An additive (hydroquinone) is placed into the storage tanks to prevent the Vinyl Acetate from polymerizing.

Shipping Unit

Unloading:

The shipping unit is responsible for unloading raw materials from barges, tank cars, and tank trucks. The unloading of the raw materials used in the Vinyl acetate and Butanol / Propanol products are controlled. The vapors of these raw materials are sent to knockout pots. Overhead streams from the pots are sent to another knockout pot with the overhead stream being sent to barge dock incinerator. The bottoms streams are all combined and sent to a neutral effluent treatment or the Bay City Site boilers.

Loading:

The shipping unit is also responsible for loading product to barges, tank cars, or tank trucks. Loading of all chemical products is controlled by knockout pots and incineration. Vapors from the tank cars are controlled by knockout pots and a flare.

Wash Rack:

Residual contents are removed from tank cars prior to the loading of the cars. Displaced vapors and wash waters are sent to a knockout pot the vapor is then sent to a flare and any wastewater stream is sent to neutral effluent treatment.

Butanol Production:

Butyraldehyde is produced through the rhodium-catalyst hydroformylation of propylene with synthesis gas and H₂. Propylene, synthesis gas and hydrogen enter the oxo section where they react to form crude butyraldehyde. A series of purification columns separate crude butyraldehyde, catalyst, and unreacted propylene. The catalyst and propylene recycle back to the oxo section for further processing. A small gas purge is sent to the Bay City Site boilers or the ethylene flare to control inert gases. The crude butyraldehyde produced in the oxo section undergoes further purification into sales grade n-butyraldehyde. Additional crude butyraldehyde provides feedstock for the butanol section. This crude reacts with H₂ in the presence of a catalyst to form crude butanol. The process routes excess H₂ and inert gases to the site boilers and the ethylene flare. A series of purification columns rectifies the crude butanol into n-butanol and i-butanol product. Waste streams produced during the purification step route to the site boilers for energy recovery.

Propanol Production:

Propionaldehyde is produced by the reaction of synthesis gas and hydrogen. Ethylene, synthesis gas, and H₂ enter the oxo section where they react to form propionaldehyde. A series of purification columns separate propionaldehyde from unreacted ethylene and synthesis gas. The ethylene and synthesis gas recycles back to the oxo section for further processing. A small gas purge is sent to the Bay City Site boilers or the ethylene flare to control inert gases. The propionaldehyde produced in the oxo section provides feedstock for the propanol section. In this section propionaldehyde reacts with H₂ in the presence of a catalyst to form crude propanol. The process routes excess H₂ and inert gases to the site boilers and the ethylene flare. A series of purification columns rectifies the crude propanol into specification grade product. Waste streams produced during the purification step route to the site boilers for energy recovery.

SFA & POX Units:

The SFA unit manufactures heptanoic acid, heptanal, nonanoic acid, and nonanal. The POX unit manufactures synthetic gas and crude hydrogen for use by other process units at the site.

Fatty Acid Production:

The SFA unit operates on a campaign basis to produce heptanoic acid and nonanoic acids. The SFA process consists of three major steps:

1. Production of Aldehydes
2. Oxidation of aldehydes from olefin feedstocks
3. Purification of crude acid

Oxo Reaction:

Olefin raw materials are sparged with synthesis gas from the POX unit in the Oxo reactor. The reaction occurs in the presence of a catalyst. A crude aldehyde and catalyst solution is also introduced to speed up the reaction. The produced crude aldehyde is then removed from the reactor solution in a vacuum flasher column. Finally, any unconverted olefin and light ends are removed in a subsequent aldehyde purification column.

Secondary Oxidation:

Purified aldehydes are then sent to the secondary oxidation section. The purified aldehydes are sparged with oxygen in the primary and secondary HOOP reactors to produce crude heptanoic or nonanoic acids.

Purification & Emissions:

The crude acids are sent through a series of distillation columns for purification.

Acetate Unit:

The Acetate Unit operates on a campaign basis to produce propyl acetate, i-acetate, and n-butyl acetate (acetate esters) from propanol, i-butanol & n-butanol, and acetic acid. The process consists of three major steps:

1. Production of acetate esters from the reaction of acetic acid and alcohol
2. Removal of organics from the water of reaction utilizing distillation columns
3. Further purification of step 2 involving distillation columns

Effluent water generated from the process is sent for neutralization treatment. Vent gases from the process are sent to either the boilers or the ethylene flare. The final products are stored in multiple tanks prior to loading and 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, 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 an 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 is 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) 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 Requirements 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 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.

The applicant opted to comply with the more stringent 20% opacity standard under 30 TAC § 111.111(a)(1)(B) for all stationary vents that are subject to the 30% opacity standard under 30 TAC § 111.111(a)(1)(A).

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

Regulatory Program	Applicability (Yes/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
CSAPR (Cross-State Air Pollution Rule)	No
Federal Implementation Plan for Regional Haze (Texas SO ₂ Trading Program)	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 and Emission Units

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:

De Minimis Sources

1. Sources identified in the "De Minimis Facilities or Sources" list maintained by TCEQ. The list is available at https://www.tceq.texas.gov/permitting/air/newsourcereview/de_minimis.html.

Miscellaneous Sources

2. Office activities such as photocopying, blueprint copying, and photographic processes.
3. Outdoor barbecue pits, campfires, and fireplaces.
4. Storage and handling of sealed portable containers, cylinders, or sealed drums.
5. Vehicle exhaust from maintenance or repair shops.
6. 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).
7. 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.
8. 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.
9. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
10. Well cellars.
11. 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.
12. Equipment used exclusively for the melting or application of wax.

13. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
14. Battery recharging areas.

Sources Authorized by 30 TAC Chapter 106, Permits by Rule

15. Sources authorized by §106.102: Combustion units designed and used exclusively for comfort heating purposes employing liquid petroleum gas, natural gas, solid wood, or distillate fuel oil.
16. Sources authorized by §106.122: 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.
17. Sources authorized by §106.141: Batch mixers with rated capacity of 27 cubic feet or less for mixing cement, sand, aggregate, lime, gypsum, additives, and/or water to produce concrete, grout, stucco, mortar, or other similar products.
18. Sources authorized by §106.143: Wet sand and gravel production facilities that obtain material from subterranean and subaqueous beds where the deposits of sand and gravel are consolidated granular materials resulting from natural disintegration of rock and stone and have a production rate of 500 tons per hour or less.
19. Sources authorized by §106.148: Railcar or truck unloading of wet sand, gravel, aggregate, coal, lignite, and scrap iron or scrap steel (but not including metal ores, metal oxides, battery parts, or fine dry materials) into trucks or other railcars for transportation to other locations.
20. Sources authorized by §106.149: Sand and gravel production facilities that obtain material from deposits of sand and gravel consisting of natural disintegration of rock and stone, provided that crushing or breaking operations are not used, and no blasting is conducted to obtain the material.
21. Sources authorized by §106.161: Animal feeding operations which confine animals in numbers specified and any associated on-site feed handling and/or feed millings operations, not including caged laying and caged pullet operations.
22. Sources authorized by §106.162: Livestock auction sales facilities.
23. Sources authorized by §106.163: All animal racing facilities, domestic animal shelters, zoos, and their associated confinement areas, stables, feeding areas, and waste collection and treatment facilities, other than incineration units.
24. Sources authorized by §106.229: Equipment used exclusively for the dyeing or stripping of textiles.
25. Sources authorized by §106.241: Any facility where animals or poultry are slaughtered and prepared for human consumption provided that waste products such as blood, offal, and feathers are stored in such a manner as to prevent the creation of a nuisance condition and these waste products are removed from the premises daily or stored under refrigeration.
26. Sources authorized by §106.242: Equipment used in eating establishments for the purpose of preparing food for human consumption.
27. Sources authorized by §106.243: Smokehouses in which the maximum horizontal inside cross-sectional area does not exceed 100 square feet.
28. Sources authorized by §106.244: Ovens, mixers, blenders, barbecue pits, and cookers if the products are edible and intended for human consumption.
29. Sources authorized by §106.266: Vacuum cleaning systems used exclusively for industrial, commercial, or residential housekeeping purposes.
30. Sources authorized by §106.301: Aqueous fertilizer storage tanks.
31. Sources authorized by §106.313: 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.
32. Sources authorized by §106.316: Equipment used for inspection of metal products.
33. Sources authorized by §106.317: Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
34. Sources authorized by §106.318: Die casting machines.
35. Sources authorized by §106.319: Foundry sand mold forming equipment to which no heat is applied.
36. Sources authorized by §106.331: Equipment used exclusively to package pharmaceuticals and cosmetics or to coat pharmaceutical tablets.
37. Sources authorized by §106.333: Equipment used exclusively for the mixing and blending of materials at ambient temperature to make water-based adhesives.
38. Sources authorized by §106.372: 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.
39. Sources authorized by §106.391: Presses used for the curing of rubber products and plastic products.
40. Sources authorized by §106.394: Equipment used for compression molding and injection molding of plastics.

41. Sources authorized by §106.414: Equipment used exclusively for the packaging of lubricants or greases.
42. Sources authorized by §106.415: Laundry dryers, extractors, and tumblers used for fabrics cleaned with water solutions of bleach or detergents.
43. Sources authorized by §106.431: Equipment used exclusively to mill or grind coatings and molding compounds where all materials charged are in paste form.
44. Sources authorized by §106.432: Containers, reservoirs, or tanks used exclusively for dipping operations for coating objects with oils, waxes, or greases where no organic solvents, diluents, or thinners are used; or dipping operations for applying coatings of natural or synthetic resins which contain no organic solvents.
45. Sources authorized by §106.451: Blast cleaning equipment using a suspension of abrasives in water.
46. Sources authorized by §106.453: Equipment used for washing or drying products fabricated from metal or glass, provided no volatile organic materials are used in the process and no oil or solid fuel is burned.
47. Sources authorized by §106.471: Equipment used exclusively to store or hold dry natural gas.
48. Sources authorized by §106.531: Sewage treatment facilities, excluding combustion or incineration equipment, land farms, or grease trap waste handling or treatment facilities.

Determination of Applicable Requirements

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

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

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

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

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

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

Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable

requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
110V1211	30 TAC Chapter 115, Storage of VOCs	R5112-IFR	<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 greater than 25,000 gallons</p> <p>Tank Description = Tank using an internal floating roof without slotted sampling and gauge pipes</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia but less than 11 psia</p>	
110V1211	40 CFR Part 60, Subpart Kb	60KB-IFR	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 39,890 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia</p> <p>Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal</p>	
110V1323	40 CFR Part 60, Subpart Kb	60KB-MID-EX	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 19,813 gallons but less than 39,890 gallons (capacity is greater than 75,000 liters but less than or equal to 151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is less than 2.2 psia</p>	
251CV812	30 TAC Chapter 115, Storage of VOCs	R5112-IFR	<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 greater than 25,000 gallons</p> <p>Tank Description = Tank using an internal floating roof without slotted sampling and gauge pipes</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia but less than 11 psia</p>	
251CV812	40 CFR Part 63, Subpart G	63G-TANK-IFR-D	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Emission Control Type = Internal floating roof</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Seal Type = Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the floating roof	
GRP63GTK	30 TAC Chapter 115, Storage of VOCs	R5112-CVS	<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 greater than 25,000 gallons</p> <p>Tank Description = Tank using a submerged fill pipe and vapor recovery system</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 11 psia</p>	
GRP63GTK	40 CFR Part 63, Subpart G	63G-TANK-FLR	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is greater than or equal to 11.11 psi (76.6 kPa)</p> <p>Emission Control Type = Closed vent system (CVS) and control device (fixed roof)</p> <p>Closed Vent System = Closed vent system is subject to § 63.172 of Subpart H.</p> <p>Bypass Lines = Closed vent system has no by-pass lines.</p> <p>Control Device Type = Flare</p> <p>Control Device Design = The control device was not installed on or before December 31, 1992 or was not designed to reduce inlet emissions of total organic hazardous air pollutants by greater than or equal to 90% and less than 95%.</p>	
GRPMACTT NK	30 TAC Chapter 115, Storage of VOCs	R5112-IFR	<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 greater than 25,000 gallons</p> <p>Tank Description = Tank using an internal floating roof without slotted sampling and gauge pipes</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia but less than 11 psia</p>	
GRPMACTT NK	40 CFR Part 63, Subpart G	63G-TANK-IFR-M	<p>MACT Subpart F/G Applicability = The unit is a Group 1 vessel (as defined in Table 5 for existing sources or Table 6 for new sources of 40 CFR 63, Subpart G).</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>Maximum TVP = Maximum true vapor pressure of the total organic HAP in the liquid is less than 11.11 psi (76.6 kPa)</p> <p>Emission Control Type = Internal floating roof</p> <p>Seal Type = Metallic shoe seal (as defined in 40 CFR § 63.111)</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
GRPMEDTN K	30 TAC Chapter 115, Storage of VOCs	R5112-SMALL	<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 greater than 1,000 gallons but less than or equal to 25,000 gallons</p> <p>Construction Date = Before May 12, 1973</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia but less than 11 psia</p>	
251DBL	40 CFR Part 63, Subpart Y	63Y	<p>Subpart Y Facility Type = Existing onshore loading terminal (located onshore or less than 0.5 miles from shore).</p> <p>Ballasting Operations = Operations other than or in addition to ballasting operations are performed at the facility.</p> <p>Vapor Pressure = Vapor pressure is greater than or equal to 10.3 kilopascals (1.5 psia) at standard conditions, 20° C and 760 mm Hg.</p> <p>Subpart BB Applicability = Marine vessel loading operations are not subject to and complying with 40 CFR Part 61, Subpart BB.</p> <p>Material Loaded = Material other than crude oil or gasoline.</p> <p>HAP Impurities Only = Marine vessel loading operations at loading berths transfer liquids containing organic hazardous air pollutants other than as impurities.</p> <p>Source Emissions = Source with emissions less than 10 and 25 tons.</p>	
251DTC	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-CVS	<p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.</p> <p>Transfer Type = Loading and unloading.</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia.</p> <p>Daily Throughput = Daily throughput not determined since 30 TAC § 115.217(a)(2)(A) or 30 TAC § 115.217(b)(3)(A) exemption is not utilized.</p> <p>Control Options = Vapor control system that maintains a control efficiency of at least 90%.</p> <p>Chapter 115 Control Device Type = Vapor control system with a flare; or a vapor combustor considered to be a flare</p> <p>Vapor Tight = Not all liquid and vapor lines are equipped with fittings which make vapor-tight connections that close automatically when disconnected.</p>	<p>--Affected Pollutant - VOC:</p> <p><u>Recordkeeping</u> - § 115.216(3)(A)(i) & § 115.216(3)(A)(iii) were deleted because these only apply to tank trucks and this is a railcar.</p>
251DTC	40 CFR Part 63, Subpart EEEE	63EEEE-1	Existing Source = Source is an existing source	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Transfer Operation = Transfer rack both loads and unloads organic liquids</p> <p>Transfer Volume = Less than 800,000 gallons of organic containing liquids are transferred by the organic loading distribution facility annually.</p> <p>Weight Percent HAP = Liquids transferred contain 98 percent by weight or greater HAP</p>	
251DTC	40 CFR Part 63, Subpart G	63-RACK-FLR	<p>Transfer Rack Type = Group 1 transfer rack (as defined in 40 CFR § 63.111).</p> <p>Closed Vent System = Closed vent system is subject to § 63.172 of Subpart H.</p> <p>Vapor Balancing System = A vapor balancing system is not being used to reduce emissions of organic hazardous air pollutants.</p> <p>Emissions Routing = Emissions of organic hazardous air pollutants are not routed to a fuel gas system nor to a process where the organic hazardous air pollutants meet one or more of the ends specified in 40 CFR § 63.126(b)(4)(i) - (iv).</p> <p>Bypass Lines = The vent system does not contain by-pass lines that could divert a vent stream flow away from the control device.</p> <p>Halogenated Emissions = There are no halogenated emission streams from the transfer rack.</p> <p>Control Device = Flare.</p>	<p>--Affected Pollutant - 112(B) HAPS:</p> <p><u>Monitoring/Testing</u> - § 63.152(g)(1)(i), [G]§ 63.152(g)(1)(ii), § 63.152(g)(1)(iii), § 63.152(g)(1)(iv), [G]§ 63.152(g)(1)(v) were deleted because 63.152(g) allows the applicant to use (g)(1)-(2) as alternatives to monitoring/recordkeeping provisions listed elsewhere in the rule.</p> <p><u>Recordkeeping</u> - § 63.152(g)(1), § 63.152(g)(1)(i), [G]§ 63.152(g)(1)(ii), § 63.152(g)(1)(iii), § 63.152(g)(1)(iv), [G]§ 63.152(g)(1)(v), [G]§ 63.152(g)(1)(vi), § 63.152(g)(2), § 63.152(g)(2)(i), § 63.152(g)(2)(ii), § 63.152(g)(2)(iii) were deleted because 63.152(g) allows the applicant to use (g)(1)-(2) as alternatives to monitoring/recordkeeping provisions listed elsewhere in the rule.</p> <p><u>Reporting</u> - § 63.152(g)(1), § 63.152(g)(2)(i), § 63.152(g)(2)(ii) were deleted because 63.152(g) allows the applicant to use (g)(1)-(2) as alternatives to monitoring/recordkeeping provisions listed elsewhere in the rule.</p>
251DTL	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-CVS	<p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.</p> <p>Transfer Type = Loading and unloading.</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia.</p> <p>Daily Throughput = Daily throughput not determined since 30 TAC § 115.217(a)(2)(A) or 30 TAC § 115.217(b)(3)(A) exemption is not utilized.</p> <p>Control Options = Vapor control system that maintains a control efficiency of at least 90%.</p> <p>Chapter 115 Control Device Type = Vapor control system with a flare; or a vapor combustor considered to be a flare</p> <p>Vapor Tight = Not all liquid and vapor lines are equipped with fittings which make vapor-tight connections that close automatically when disconnected.</p>	
251DTL	40 CFR Part 63, Subpart EEEE	63EEEE-1	<p>Existing Source = Source is an existing source</p> <p>Transfer Operation = Transfer rack both loads and unloads organic liquids</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Transfer Volume = Less than 800,000 gallons of organic containing liquids are transferred by the organic loading distribution facility annually. Weight Percent HAP = Liquids transferred contain 98 percent by weight or greater HAP	
251DTL	40 CFR Part 63, Subpart G	63G-RACK-GRP2	Transfer Rack Type = Group 2 transfer rack (as defined in 40 CFR § 63.111). Subject to Subpart BB = The transfer rack is not subject to 40 CFR Part 61, Subpart BB.	
251DM1205	30 TAC Chapter 111, Visible Emissions	R1111-FLARE	Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions. Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.	
251DM1205	40 CFR Part 60, Subpart A	60A-AIR	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)(i)-(iii) or (c)(5). Flare Assist Type = Air-assisted	
251DM1205	40 CFR Part 63, Subpart A	63A-AIR	Required Under 40 CFR Part 63 = Flare is required by a Subpart under 40 CFR Part 63. Heat Content Specification = Adhering to the heat content specifications in 40 CFR § 63.11(b)(6)(ii) and the maximum tip velocity specifications in 40 CFR § 63.11(b)(7) or 40 CFR § 63.11(b)(8). Flare Assist Type = Air assisted	
110F	40 CFR Part 63, Subpart H	63H-ALL	SOP Index No. = Owner/Operator assumes fugitive control requirements for all components in VOC or VHAP service subject to 40 CFR Part 63, Subpart H with no alternated control or control device.	
251AF	40 CFR Part 60, Subpart VV	60VV-ALL	SOP Index No. = Owner or operator assumes fugitive unit control requirements for all components in VOC service subject to 40 CFR Part 60, Subpart VV with no alternate control or control devices. Produces Chemicals = The fugitive unit is part of a facility that produces as an intermediate or final product one or more of the chemicals listed in 40 CFR § 60.489. Affected Facility = The fugitive unit is part of a facility that is an affected facility as defined in 40 CFR § 60.480(a)(2). Construction/Modification Date = After January 5, 1981 and on or before November 7, 2006. Compliance Option = Choosing to comply with the provisions of 40 CFR Part 60, Subpart VV. Design Capacity = Site with a design capacity is greater than or equal to 1,000 Mg/yr. Produces Heavy Liquid Chemicals = The facility produces chemicals other than or in addition to heavy liquid chemicals only from heavy liquid feed or raw materials.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Beverage Alcohol Production = The facility does not produce only beverage alcohol.</p> <p>Equipment in VOC Service = The fugitive unit contains equipment designed to operate in VOC service.</p> <p>Vacuum Service = The fugitive unit does not contain equipment in vacuum service.</p> <p>VOC Service = Fugitive unit does not contain equipment designed to operate in VOC service less than 300 hours per year.</p> <p>Pumps in Light Liquid Service = The fugitive unit contains pumps in light liquid service.</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for pumps in light liquid service.</p> <p>Complying with 40 CFR § 60.482-2 = Pumps in light liquid service are complying with § 60.482-2.</p> <p>Compressors = The fugitive unit contains compressors.</p> <p>Sampling Connection Systems = The fugitive unit contains sampling connection systems.</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for sampling connection systems.</p> <p>Complying with 40 CFR § 60.482-5 = Sampling connection systems are complying with § 60.482-5.</p> <p>Open-ended Valves or Lines = The fugitive unit contains open-ended valves or lines.</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for open-ended valves or lines.</p> <p>Complying with 40 CFR § 60.482-6 = Open-ended valves or lines are complying with § 60.482-6.</p> <p>Valves in Gas/Vapor or Light Liquid Service = The fugitive unit contains valves in gas/vapor or light liquid service.</p> <p>2.0% = The fugitive unit is not complying with an allowable percentage of valves leaking equal to or less than 2.0%.</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for valves in gas/vapor or light liquid service.</p> <p>Complying with 40 CFR § 60.482-7 = Valves in gas/vapor or light liquid service are complying with § 60.482-7.</p> <p>Pumps in Heavy Liquid Service = The fugitive unit contains pumps in heavy liquid service.</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for pumps in heavy liquid service.</p> <p>Complying with 40 CFR § 60.482-8 = Pumps in heavy liquid service are complying with § 60.482-8.</p> <p>Valves in Heavy Liquid Service = The fugitive unit contains valves in heavy liquid service.</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for valves in heavy liquid service.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Complying with 40 CFR § 60.482-8 = Valves in heavy liquid service are complying with § 60.482-8.</p> <p>Pressure Relief Devices in Heavy or Light Liquid Service = Fugitive unit contains pressure relief devices in heavy or light liquid service.</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for pressure relief devices in heavy or light liquid service.</p> <p>Complying with 40 CFR § 60.482-8 = Pressure relief devices in heavy or light liquid service are complying with the requirements of § 60.482-8.</p> <p>Flanges and Other Connectors = The fugitive unit contains flanges and other connectors.</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for flanges and other connectors.</p> <p>Complying with 40 CFR § 60.482-8 = Flanges and other connectors are complying with § 60.482-8.</p> <p>Vapor Recovery System = The fugitive unit does not contain vapor recovery systems.</p> <p>Enclosed Combustion Device = The fugitive unit does not contain enclosed combustion devices.</p> <p>Flare = The fugitive unit contains flares.</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for flares.</p> <p>Complying with 40 CFR § 60.482-10 = Flares are complying with § 60.482-10.</p> <p>Closed Vent (or Vapor Collection) Systems = The fugitive unit contains closed vent or vapor collection systems.</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for closed vent or vapor collection systems.</p> <p>Complying with 40 CFR § 60.482-10 = Closed vent or vapor collection systems are complying with § 60.482-10.</p>	
251AF	40 CFR Part 63, Subpart H	63H-ALL	SOP Index No. = Owner/Operator assumes fugitive control requirements for all components in VOC or VHAP service subject to 40 CFR Part 63, Subpart H with no alternated control or control device.	
251DTC	40 CFR Part 63, Subpart EEEE	63EEEE-1	Component Service Hours = Pumps, valves or sampling connections at the Organic Loading Distribution Facility operate in organic HAP service 300 hours/yr or more.	
251DTL	40 CFR Part 63, Subpart EEEE	63EEEE-1	Component Service Hours = Pumps, valves or sampling connections at the Organic Loading Distribution Facility operate in organic HAP service 300 hours/yr or more.	
110T22	30 TAC Chapter 115, Vent Gas Controls	R5121-LOWLBS	<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>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Vent Type = Vent gas stream emissions of the specified classes of VOCs including aldehydes, alcohols, aromatics, ethers, olefins, peroxides, amines, acids, esters, ketones, sulfides, and branched chain hydrocarbons (C8 and above).</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 greater than or equal to 30,000 ppmv.</p>	
110T22	40 CFR Part 63, Subpart G	63G-VENT-GRP2	<p>Overlap = Title 40 CFR Part 63, Subpart G only</p> <p>Group 1 = The process vent is a Group 2 process vent.</p> <p>HAP Concentration = HAP concentration is less than to 50 ppm.</p> <p>Flow Rate = Flow rate is not needed to determine applicability.</p> <p>Electing Control = Not electing to control the process vent to the levels required in 40 CFR § 63.113(a)(1) or (a)(2).</p> <p>Control Device = Control or recapture device other than those specified in 40 CFR § 63.114(a) and (b) or in 40 CFR Part 60, Subparts III, NNN or RRR.</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>TRE for Halogenated Vent Stream = The total resource effectiveness (TRE) index value is not being calculated for a halogenated vent stream.</p> <p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>By-pass Lines = The vent system does not contain by-pass lines that can divert the vent stream from the control device.</p>	<p>-- Affected Pollutant - 112(B) HAPS:</p> <p><u>Monitoring/Testing</u> - [G]§ 63.115(f) was deleted because 63.152(g) allows the applicant to use (g)(1)-(2) as alternatives to monitoring/recordkeeping provisions listed elsewhere in the rule.</p>
110T30	40 CFR Part 63, Subpart G	63G-VENT-GRP2	<p>Overlap = Title 40 CFR Part 63, Subpart G only</p> <p>Group 1 = The process vent is a Group 2 process vent.</p> <p>HAP Concentration = HAP concentration is less than to 50 ppm.</p> <p>Flow Rate = Flow rate is not needed to determine applicability.</p> <p>Electing Control = Not electing to control the process vent to the levels required in 40 CFR § 63.113(a)(1) or (a)(2).</p> <p>Control Device = Control or recapture device other than those specified in 40 CFR § 63.114(a) and (b) or in 40 CFR Part 60, Subparts III, NNN or RRR.</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>TRE for Halogenated Vent Stream = The total resource effectiveness (TRE) index value is not being calculated for a halogenated vent stream.</p> <p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>By-pass Lines = The vent system does not contain by-pass lines that can divert the vent stream from the control device.</p>	<p>-- Affected Pollutant - 112(B) HAPS:</p> <p><u>Monitoring/Testing</u> - [G]§ 63.115(f) was deleted because 63.152(g) allows the applicant to use (g)(1)-(2) as alternatives to monitoring/recordkeeping provisions listed elsewhere in the rule.</p>
110T33	40 CFR Part 63, Subpart G	63G-VENT-BLR	<p>Overlap = Title 40 CFR Part 60, Subpart NNN</p> <p>Group 1 = The process vent meets the definition of a Group 1 process vent.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>HAP Concentration = HAP concentration is not needed to determine applicability.</p> <p>Flow Rate = Flow rate is not needed to determine applicability.</p> <p>Control Device = Boiler or process heater with a design heat input capacity of greater than 44 MW.</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>TRE for Halogenated Vent Stream = The total resource effectiveness (TRE) index value is not being calculated for a halogenated vent stream.</p> <p>Performance Test = No previous performance test was conducted.</p> <p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>By-pass Lines = The vent system contains by-pass lines that can divert the vent stream from the control device.</p> <p>Flow Indicator = A flow indicator is installed and operated at the entrance of the by-pass line.</p>	<p>-- Affected Pollutant - 112(B) HAPS:</p> <p><u>Monitoring/Testing</u> - [G]§ 63.115(f) was deleted because 63.152(g) allows the applicant to use (g)(1)-(2) as alternatives to monitoring/recordkeeping provisions listed elsewhere in the rule.</p>
110T33	40 CFR Part 63, Subpart G	63G-VENT-FLR	<p>Overlap = Title 40 CFR Part 60, Subpart NNN</p> <p>Group 1 = The process vent meets the definition of a Group 1 process vent.</p> <p>Control Device = Flare</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>Performance Test = No previous performance test was conducted.</p> <p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>By-pass Lines = The vent system contains by-pass lines that can divert the vent stream from the control device.</p> <p>Flow Indicator = A flow indicator is installed and operated at the entrance of the by-pass line.</p>	<p>-- Affected Pollutant - 112(B) HAPS:</p> <p><u>Monitoring/Testing</u> - [G]§ 63.115(f) was deleted because 63.152(g) allows the applicant to use (g)(1)-(2) as alternatives to monitoring/recordkeeping provisions listed elsewhere in the rule.</p>
110V803	30 TAC Chapter 115, Vent Gas Controls	R5121-FLR	<p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Vent gas stream emissions of the specified classes of VOCs including aldehydes, alcohols, aromatics, ethers, olefins, peroxides, amines, acids, esters, ketones, sulfides, and branched chain hydrocarbons (C8 and above).</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is greater than 100 pounds (45.4 kg).</p> <p>VOC Concentration = VOC concentration is greater than or equal to 30,000 ppmv.</p> <p>VOC Concentration or Emission Rate at Maximum Operating Conditions = Either the VOC concentration or emission rate is greater than the applicable exemption limit at maximum actual operating conditions or the alternate recordkeeping requirements of 30 TAC § 115.126(4) are not being selected.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Alternate Control Requirement = Alternate control is not used.</p> <p>Control Device Type = Smokeless flare</p>	
110V803	40 CFR Part 63, Subpart G	63G-VENT-FLR	<p>Overlap = Title 40 CFR Part 60, Subpart NNN</p> <p>Group 1 = The process vent meets the definition of a Group 1 process vent.</p> <p>Control Device = Flare</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>Performance Test = No previous performance test was conducted.</p> <p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.</p> <p>By-pass Lines = The vent system does not contain by-pass lines that can divert the vent stream from the control device.</p>	<p>-- Affected Pollutant - 112(B) HAPS:</p> <p><u>Monitoring/Testing</u> - [G]§ 63.115(f) was deleted because 63.152(g) allows the applicant to use (g)(1)-(2) as alternatives to monitoring/recordkeeping provisions listed elsewhere in the rule.</p>
251V1272	30 TAC Chapter 115, Vent Gas Controls	R5121-BLR	<p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Vent gas stream emissions of the specified classes of VOCs including aldehydes, alcohols, aromatics, ethers, olefins, peroxides, amines, acids, esters, ketones, sulfides, and branched chain hydrocarbons (C8 and above).</p> <p>Alternate Control Requirement = Alternate control is not used.</p> <p>Control Device Type = Direct flame incinerator in which the vent gas stream is burned at a temperature or at least 1300° F (704 C).</p>	
251V838	30 TAC Chapter 115, Vent Gas Controls	R5121-FLR	<p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Vent gas stream emissions of the specified classes of VOCs including aldehydes, alcohols, aromatics, ethers, olefins, peroxides, amines, acids, esters, ketones, sulfides, and branched chain hydrocarbons (C8 and above).</p> <p>Alternate Control Requirement = Alternate control is not used.</p> <p>Control Device Type = Smokeless flare</p>	
GRPNNNCL MS	40 CFR Part 63, Subpart G	63G-NNN-BLR	<p>Overlap = Title 40 CFR Part 60, Subpart NNN</p> <p>Group 1 = The process vent meets the definition of a Group 1 process vent.</p>	<p>-- Affected Pollutant - 112(B) HAPS:</p>

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Control Device = Boiler or process heater with a design heat input capacity of greater than 44 MW.</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>Performance Test = No previous performance test was conducted.</p> <p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.</p> <p>By-pass Lines = The vent system contains by-pass lines that can divert the vent stream from the control device.</p> <p>Flow Indicator = A flow indicator is installed and operated at the entrance of the by-pass line.</p>	<p><u>Monitoring/Testing</u> - [G]§ 63.115(f) was deleted because 63.152(g) allows the applicant to use (g)(1)-(2) as alternatives to monitoring/recordkeeping provisions listed elsewhere in the rule.</p>
GRPNNNCL MS	40 CFR Part 63, Subpart G	63G-NNN-FLR	<p>Overlap = Title 40 CFR Part 60, Subpart NNN</p> <p>Group 1 = The process vent meets the definition of a Group 1 process vent.</p> <p>Control Device = Flare</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>Performance Test = No previous performance test was conducted.</p> <p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.</p> <p>By-pass Lines = The vent system contains by-pass lines that can divert the vent stream from the control device.</p> <p>Flow Indicator = A flow indicator is installed and operated at the entrance of the by-pass line.</p>	<p>-- Affected Pollutant - 112(B) HAPS:</p> <p><u>Monitoring/Testing</u> - [G]§ 63.115(f) was deleted because 63.152(g) allows the applicant to use (g)(1)-(2) as alternatives to monitoring/recordkeeping provisions listed elsewhere in the rule.</p>
PROVA	40 CFR Part 63, Subpart F	63F	<p>Applicable Chemicals = The chemical manufacturing process unit manufactures, as a primary product, one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or 40 CFR § 63.100(b)(1)(ii).</p> <p>Table 2 HAP = The chemical manufacturing process unit uses as a reactant or manufactures, as a product or co-product, one or more of the organic hazardous air pollutants in Table 2.</p> <p>Alternate Means of Emission Limitation = No alternative means of emission limitation has been approved by the EPA Administrator to achieve a reduction in organic HAP emission or no alternate has been requested.</p> <p>Heat Exchange System = A heat exchange system is utilized.</p> <p>Cooling Water Pressure = The heat exchange system is not operated with the minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side.</p> <p>Intervening Cooling Fluid = There is no intervening cooling fluid containing less than 5 percent by weight of total HAPs listed in Table 4 of 40 CFR Part 63, Subpart F, between the process and cooling water.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Table 4 HAP Content = The recirculating heat exchange system is not used exclusively to cool process fluids that contain less than 5 percent by weight of total HAPs listed in Table 4 of title 40 CFR Part 63, Subpart F.</p> <p>NPDES Permit = The once-through heat exchange system is not subject to NPDES permit with an allowable discharge limit of 1 part per million or less above influent concentration or 10 percent or less above influent concentration.</p> <p>Meets 40 CFR 63.104(a)(4)(i)-(iv) = The once-through heat exchange system is not subject to an NPDES permit that meets 40 CFR § 63.104(a)(4)(i) - (iv).</p> <p>Table 9 HAP Content = The once-through heat exchange system is not used exclusively to cool process fluids that contain less than 5 percent by weight of total HAPs listed in Table 9 of 40 CFR Part 63, Subpart G.</p> <p>Cooling Water Monitored = The cooling water is being monitored for the presence of one or more HAPs or other representative substances whose presence in cooling water indicates a leak.</p>	

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

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

NSR Versus Title V FOP

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

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

NSR Permit	Federal Operating Permit (FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and 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.	FOPs 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. In addition, many of the permits are accessible online through the link provided below. 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. Permit by Rule (PBR) registrations submitted by permittees are also available online through the link provided below. The following table specifies the PBRs that apply to the site.

The status of air permits, applications, and PBR registrations may be found by performing the appropriate search of the databases located at the following website:

www.tceq.texas.gov/permitting/air/nav/air_status_permits.html

Details on how to search the databases are available in the **Obtaining Permit Documents** section below.

New Source Review Authorization References

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.: 4196	Issuance Date: 12/29/2022
Authorization No.: 4449	Issuance Date: 06/28/2023
Permits by Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.183	Version No./Date: 06/18/1997
Number: 106.261	Version No./Date: 09/04/2000
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.262	Version No./Date: 03/14/1997
Number: 106.262	Version No./Date: 09/04/2000
Number: 106.262	Version No./Date: 11/01/2003
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.264	Version No./Date: 03/14/1997
Number: 106.371	Version No./Date: 09/04/2000
Number: 106.433	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: 03/14/1997
Number: 106.476	Version No./Date: 09/04/2000
Number: 106.478	Version No./Date: 03/14/1997
Number: 106.492	Version No./Date: 09/04/2000
Number: 106.511	Version No./Date: 09/04/2000
Number: 8	Version No./Date: 11/05/1986
Number: 14	Version No./Date: 11/05/1986
Number: 51	Version No./Date: 11/05/1986
Number: 51	Version No./Date: 08/30/1988
Number: 51	Version No./Date: 07/20/1992
Number: 51	Version No./Date: 06/07/1996
Number: 52	Version No./Date: 11/25/1985
Number: 53	Version No./Date: 09/12/1989
Number: 53	Version No./Date: 07/20/1992

New Source Review Authorization References

Number: 57	Version No./Date: 05/05/1976
Number: 58	Version No./Date: 01/08/1980
Number: 58	Version No./Date: 09/23/1982
Number: 61	Version No./Date: 08/30/1988
Number: 64	Version No./Date: 05/08/1972
Number: 76	Version No./Date: 05/04/1994
Number: 80	Version No./Date: 05/04/1994
Number: 86	Version No./Date: 06/07/1996
Number: 106	Version No./Date: 05/04/1994
Number: 106	Version No./Date: 04/05/1995
Number: 106	Version No./Date: 10/04/1995
Number: 106	Version No./Date: 06/07/1996
Number: 118	Version No./Date: 09/13/1993
Number: 118	Version No./Date: 05/04/1994
Number: 118	Version No./Date: 04/05/1995
Number: 118	Version No./Date: 10/04/1995
Number: 118	Version No./Date: 06/07/1996
Municipal Solid Waste and Industrial Hazardous Waste Permits with an Air Addendum	
Permit No.: 50153	

Permits by Rule

The TCEQ has interpreted the emission limits prescribed in 30 TAC §106.4(a) as both emission thresholds and default emission limits. The emission limits in 30 TAC §106.4(a) are all considered applicable to each facility as a threshold matter to ensure that the owner/operator qualifies for the PBR authorization. Those same emission limits are also the default emission limits if the specific PBR does not further limit emissions or there is no lower, certified emission limit claimed by the owner/operator.

This interpretation is consistent with how TCEQ has historically determined compliance with the emission limits prior to the addition of the “as applicable” language. The “as applicable” language was added in 2014 as part of changes to the sentence structure in a rulemaking that made other changes to address greenhouse gases and was not intended as a substantive rule change. This interpretation also provides for effective and practical enforcement of 30 TAC §106.4(a), since for the TCEQ to effectively enforce the emission limits in 30 TAC §106.4(a) as emission thresholds, all emission limits must apply. As provided by 30 TAC §106.4(a)(2) and (3), an owner/operator shall not claim a PBR authorization if the facility is subject to major New Source Review. The practical and legal effect of the language in 30 TAC § 106.4 is that if a facility does not emit a pollutant, then the potential to emit for that particular pollutant is zero, and thus, the facility is not authorized to emit the pollutant pursuant to the PBR.

The permit holder is required to keep records for demonstrating compliance with PBRs in accordance with 30 TAC § 106.8 for the following categories:

- As stated in 30 TAC § 106.8(a), the permit holder is not required to keep records for de minimis sources as designated in 30 TAC § 116.119.
- As stated in 30 TAC § 106.8(b) for PBRs on the insignificant activities list, the permit holder is required to provide information that would demonstrate compliance with the general requirements of 30 TAC § 106.4.

- As stated in 30 TAC § 106.8(c) for all other PBRs, the permit holder must maintain sufficient records to demonstrate compliance with the general requirements specified in 30 TAC § 106.4 and to demonstrate compliance with the emission limits and any specific conditions of the PBR as applicable.

The application, or a previously submitted application, contains a PBR Supplemental Table. This table provides supplemental information for all PBR authorizations at the site or application area, including PBRs that are not listed on the OP-REQ1 form. PBRs that are not listed on the OP-REQ1 form authorize emission units that the TCEQ has determined are insignificant sources of emissions (IEUs). PBRs are enforceable through permit condition number 18. The EPA gives States broad discretion in prescribing monitoring, recordkeeping, and reporting for generally applicable requirements that cover insignificant emission units. (see EPA *White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program*). Federal regulations specifically identify recordkeeping as an appropriate level of monitoring necessary to assure compliance with the requirements applicable to an emissions unit. Permitting authorities have the best sense of where it is appropriate to conclude that periodic monitoring is not necessary for IEUs, when state program rules already provide sufficient monitoring for these units.

In the case of IEUs in particular, the recordkeeping in 30 TAC §106.8 is sufficient because the units do not have the potential to violate emission limitations or other requirements under normal operating conditions. In particular, where the establishment of a regular program of monitoring would not significantly enhance the ability of the permit to assure compliance with the applicable requirement, the permitting authority can provide that the applicable requirement has monitoring sufficient to yield reliable data that is representative of the emission unit's compliance with the limitations. Therefore, for IEUs compliance with 30 TAC §106.8 is sufficient to meet federal monitoring requirements.

The PBR records may include, but are not limited to, production capacity and throughput, hours of operation, safety data sheets (SDS), chemical composition of raw materials, speciation of air contaminant data, engineering calculations, maintenance records, fugitive data, performance tests, capture/control device efficiencies, or parametric monitoring. The PBR records also satisfy the federal operating permit periodic monitoring requirements of 30 TAC § 122.142(c) as they are representative of the emission unit's compliance with 30 TAC Chapter 106.

Emission Units and Emission Points

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

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

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

Monitoring Sufficiency

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

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

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

Periodic Monitoring:

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

Unit/Group/Process Information	
ID No.: 110V1211	
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.: R5112-IFR
Pollutant: VOC	Main Standard: § 115.112(c)(1)
Monitoring Information	
Indicator: Internal Floating Roof	
Minimum Frequency: annually	
Averaging Period: n/a	
Deviation Limit: Presence of defects listed in the Periodic Monitoring Text identified during inspection of internal floating roof	
Basis of monitoring: Visual inspections of the external or internal floating roof to ensure: that the roof is floating on the surface of the VOC and not on the leg supports, liquid has not accumulated on the external floating roof, the seals are not detached, and there are no holes or tears in the seal fabric; provides an assurance of compliance that it is operating in accordance with its design to meet the required 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, Subchapter B, Division 1: Storage of VOCs. 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, Subchapter B, Division 1: Storage of VOCs.	

Unit/Group/Process Information	
ID No.: 251CV812	
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.: R5112-IFR
Pollutant: VOC	Main Standard: § 115.112(c)(1)
Monitoring Information	
Indicator: Internal Floating Roof	
Minimum Frequency: annually	
Averaging Period: n/a	
Deviation Limit: Presence of defects listed in the Periodic Monitoring Text identified during inspection of internal floating roof	
<p>Basis of monitoring: Visual inspections of the external or internal floating roof to ensure: that the roof is floating on the surface of the VOC and not on the leg supports, liquid has not accumulated on the external floating roof, the seals are not detached, and there are no holes or tears in the seal fabric; provides an assurance of compliance that it is operating in accordance with its design to meet the required 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, Subchapter B, Division 1: Storage of VOCs. 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, Subchapter B, Division 1: Storage of VOCs.</p>	

Unit/Group/Process Information	
ID No.: GRP63GTK	
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.: R5112-CVS
Pollutant: VOC	Main Standard: § 115.112(c)(1)
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Once per hour	
Averaging Period: n/a	
Deviation Limit: Absence of flare pilot flame	
<p>Basis of monitoring: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.</p>	

Unit/Group/Process Information	
ID No.: GRPMACTTNK	
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.: R5112-IFR
Pollutant: VOC	Main Standard: § 115.112(c)(1)
Monitoring Information	
Indicator: Internal Floating Roof	
Minimum Frequency: annually	
Averaging Period: n/a	
Deviation Limit: Presence of defects listed in the Periodic Monitoring Text identified during inspection of internal floating roof	
Basis of monitoring: Visual inspections of the external or internal floating roof to ensure: that the roof is floating on the surface of the VOC and not on the leg supports, liquid has not accumulated on the external floating roof, the seals are not detached, and there are no holes or tears in the seal fabric; provides an assurance of compliance that it is operating in accordance with its design to meet the required 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, Subchapter B, Division 1: Storage of VOCs. 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, Subchapter B, Division 1: Storage of VOCs.	

Obtaining Permit Documents

The New Source Review Authorization References table in the FOP specifies all NSR authorizations that apply at the permit area covered by the FOP. Individual NSR permitting files are located in the TCEQ Central File Room (TCEQ Main Campus located at 12100 Park 35 Circle, Austin, Texas, 78753, Building E, Room 103). They can also be obtained electronically from TCEQ's Central File Room Online (<https://www.tceq.texas.gov/goto/cfr-online>). Guidance documents that describe how to search electronic records, including Permits by Rule (PBRs) or NSR permits incorporated by reference into an FOP, archived in the Central File Room server are available at https://www.tceq.texas.gov/permitting/air/nav/air_status_permits.html

All current PBRs are contained in Chapter 106 and can be viewed at the following website:

https://www.tceq.texas.gov/permitting/air/permitbyrule/air_pbr_index.html

Previous versions of 30 TAC Chapter 106 PBRs may be viewed at the following website:

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

Historical Standard Exemption lists may be viewed at the following website:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html

Additional information concerning PBRs is available on the TCEQ website:

https://www.tceq.texas.gov/permitting/air/nav/air_pbr.html

Compliance Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on March 22, 2024.

Site rating: 0.00 / High Company rating: 0.76 / 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-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 - 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
OP-UA64 - Coal Preparation Plant Attributes