Statement of Basis of the Federal Operating Permit

Eastman Chemical Company

Site Name: Eastman Chemical Company Texas Operations
Area Name: C3 - Texanol
Physical Location: 300 Kodak Blvd
Nearest City: Longview
County: Harrison

Permit Number: O1977
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: September 22, 2026

Operating Permit
Basis of Determination

Permit Area Process Description

The application area includes five plants: the Texanol Plant, the Mixed Esters Plant, the Nitriles/Ketone Plant, the Butyric Acid Plant and the Propionic Acid Plant.

The Texanol Plant manufactures C8 - C16 alcohols and esters from butyraldehydes, butyric acids and butanols. The process steps are raw materials storage, reaction, separation, and product storage. Emission units include reactors, process tanks, distillation units and storage tanks. There are also fugitive equipment leaks, heat exchanger leaks and wastewater emissions. The emissions generated are volatile organic compounds (VOCs).

The Mixed Esters Plant manufactures ethyl acetate, isobutyl acetate, and isobutyl isobutyrate from acetaldehyde, ethanol, and butyraldehydes. The major process steps are raw materials storage, reaction, separation and product storage. Emission units include reactors, process tanks, distillation units and storage tanks. There are fugitive equipment leaks, heat exchanger leaks and wastewater emissions. The emissions generated are VOC, hazardous air pollutants (HAPs) and chlorine.

The Nitriles/Ketones Plant produces butyronitriles from butyric acids and ammonia; or alternately it produces ketones from acetic, butyric and other organic acids. The major process steps are raw materials storage, reaction, separation and product storage. Emission units are reactors, process heaters, process tanks, distillation units and storage tanks. There are fugitive equipment leaks, heat exchanger leaks and wastewater emissions. The control devices are a scrubber and a flare. The emissions generated are VOCs, ammonia (NH3), particulate matter (PM), carbon monoxide (CO), sulfur oxides (SOx), and nitrogen oxides (NOx).

The Butyric Acid Plant manufactures butyric acid from butyraldehyde and oxygen. Process steps include reaction, separation and product storage. The emission units are reactors, process tanks, distillation units and storage tanks. There are fugitive equipment leaks, heat exchanger leaks and wastewater emissions. The control devices are a scrubber and a catalytic oxidizer. The emissions generated are VOCs, PM, CO, SOx, and NOx.

The Propionic Acid Plant makes propionic acid from propionaldehyde and oxygen. The process includes reaction, separation and product storage. Emissions are from reactors, distillation units, process tanks and storage tanks. There are fugitive equipment leaks, heat exchanger leaks and wastewater emissions. The control devices are a scrubber and a catalytic oxidizer. The emissions generated are VOCs, HAPs, PM, CO, SOx, and NOx.

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: O1436, O1968, O1970, O1971, O1973, O1974, O1975, O1976, O1979, O1981, O1982

Major Source Pollutants

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

Major Pollutants	VOC, SO2, PM, NOX, HAPS, CO

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 an 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)	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	No
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.

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
OX016WW3	40 CFR Part 63, Subpart G	63G-0005	Unit Type = Emission unit is a Group 1 Wastewater stream that is sent via hard piping to a treatment process (unit PROD20DSS included in FOP O1982).	The Main Standard, Related Standards, Monitoring/Testing, Recordkeeping, and Reporting rule citations were determined from an analysis of the rule text and the basis of determination.
OX011ES3	40 CFR Part 63, Subpart DDDDD	63DDDDD-0001	Commence = Source is existing (commenced construction or reconstruction on or before June 4, 2010) Table Applicability = The unit is designed to burn Gas 1 fuel AND has no continuous oxygen trim AND has heat input equal to or less than 5 MMBtu/hr	
OX011ES4	40 CFR Part 63, Subpart DDDDD	63DDDDD-0001	Commence = Source is existing (commenced construction or reconstruction on or before June 4, 2010) Table Applicability = The unit is designed to burn Gas 1 fuel AND has no continuous oxygen trim AND has heat input equal to or less than 5 MMBtu/hr	
OX011ES5	40 CFR Part 63, Subpart DDDDD	63DDDDD-0001	Commence = Source is existing (commenced construction or reconstruction on or before June 4, 2010) Table Applicability = The unit is designed to burn Gas 1 fuel AND has no continuous oxygen trim AND has heat input equal to or less than 5 MMBtu/hr	
OX011FL1C	30 TAC Chapter 111, Visible Emissions	R1111-0001	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. Construction Date = Newest source routing emissions to the flare began construction after January 31, 1972.	
OX011FL1C	40 CFR Part 60, Subpart A	60A-0001	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 = Non-assisted Flare Exit Velocity = Flare exit velocity is less than 60 ft/s (18.3 m/sec)	
OX048FL1	30 TAC Chapter 111, Visible Emissions	R1111-0002	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.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Construction Date = Newest source routing emissions to the flare began construction after January 31, 1972.	
OX011FG3	40 CFR Part 60, Subpart VV	60VV-0005	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. Beverage Alcohol Production = The facility does not produce only beverage alcohol. Equipment in VOC Service = The fugitive unit contains equipment designed to operate in VOC service. Vacuum Service = The fugitive unit does not contain equipment in vacuum service. VOC Service = Fugitive unit does not contain equipment designed to operate in VOC service less than 300 hours per year. Pumps in Light Liquid Service = The fugitive unit contains pumps in light liquid service. Equivalent Emission Limitation = No equivalent emission limitation is used for pumps in light liquid service. Complying with 40 CFR § 60.482-2 = Pumps in light liquid service are complying with § 60.482-2. Compressors = The fugitive unit does not contain compressors. Pressure Relief Devices in Gas/Vapor Service = The fugitive unit contains pressure relief devices in gas/vapor service. Sampling Connection Systems = The fugitive unit contains sampling connection systems. Equivalent Emission Limitation = No equivalent emission limitation is used for sampling connection systems. Complying with 40 CFR § 60.482-5 = Sampling connection systems are complying with § 60.482-5. Open-ended Valves or Lines = The fugitive unit contains open-ended valves or lines. Equivalent Emission Limitation = No equivalent emission limitation is used for open-ended valves or lines. Complying with 40 CFR § 60.482-6 = Open-ended valves or lines are complying with § 60.482-6. Valves in Gas/Vapor or Light Liquid Service = The fugitive unit contains valves in gas/vapor or light liquid service. 2.0% = The fugitive unit is not complying with an allowable percentage of valves leaking equal to or less than 2.0%.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Equivalent Emission Limitation = No equivalent emission limitation is used for valves in gas/vapor or light liquid service. Complying with 40 CFR § 60.482-7 = Valves in gas/vapor or light liquid service are complying with § 60.482-7. Pumps in Heavy Liquid Service = The fugitive unit contains pumps in heavy liquid service. Equivalent Emission Limitation = No equivalent emission limitation is used for pumps in heavy liquid service. Complying with 40 CFR § 60.482-8 = Pumps in heavy liquid service are complying with § 60.482-8. Valves in Heavy Liquid Service = The fugitive unit contains valves in heavy liquid service. Equivalent Emission Limitation = No equivalent emission limitation is used for valves in heavy liquid service. Complying with 40 CFR § 60.482-8 = Valves in heavy liquid service are complying with § 60.482-8. Pressure Relief Devices in Heavy or Light Liquid Service = Fugitive unit contains pressure relief devices in heavy or light liquid service. Equivalent Emission Limitation = No equivalent emission limitation is used for pressure relief devices in heavy or light liquid service. 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. Flanges and Other Connectors = The fugitive unit contains flanges and other connectors. Equivalent Emission Limitation = No equivalent emission limitation is used for flanges and other connectors. Complying with 40 CFR § 60.482-8 = Flanges and other connectors are complying with § 60.482-8. Vapor Recovery System = The fugitive unit does not contain vapor recovery systems. Enclosed Combustion Device = The fugitive unit does not contain enclosed combustion devices. Flare = The fugitive unit does not contain flares. Closed Vent (or Vapor Collection) Systems = The fugitive unit does not contain closed vent or vapor collection systems.	
OX015FG2	40 CFR Part 63, Subpart FFFF	63FFFF-0002	Existing Source = Fugitive unit contains equipment in an existing Miscellaneous Chemical Processing Unit.	
OX016FG1	40 CFR Part 60, Subpart VV	60VV-0006	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.	

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

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Equivalent Emission Limitation = No equivalent emission limitation is used for valves in heavy liquid service. Complying with 40 CFR § 60.482-8 = Valves in heavy liquid service are complying with § 60.482-8. Pressure Relief Devices in Heavy or Light Liquid Service = Fugitive unit contains pressure relief devices in heavy or light liquid service. Equivalent Emission Limitation = No equivalent emission limitation is used for pressure relief devices in heavy or light liquid service. 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. Flanges and Other Connectors = The fugitive unit contains flanges and other connectors. Equivalent Emission Limitation = No equivalent emission limitation is used for flanges and other connectors. Complying with 40 CFR § 60.482-8 = Flanges and other connectors are complying with § 60.482-8. Vapor Recovery System = The fugitive unit does not contain vapor recovery systems. Enclosed Combustion Device = The fugitive unit does not contain enclosed combustion devices. Flare = The fugitive unit does not contain flares. Closed Vent (or Vapor Collection) Systems = The fugitive unit does not contain closed vent or vapor collection systems.	
OX016FG3	40 CFR Part 60, Subpart VV	60VV-0007	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. Beverage Alcohol Production = The facility does not produce only beverage alcohol. Equipment in VOC Service = The fugitive unit contains equipment designed to operate in VOC service. Vacuum Service = The fugitive unit does not contain equipment in vacuum service. VOC Service = Fugitive unit does not contain equipment designed to operate in VOC service less than 300 hours per year. Pumps in Light Liquid Service = The fugitive unit contains pumps in light liquid service. Equivalent Emission Limitation = No equivalent emission limitation is used for pumps in light liquid service.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Complying with 40 CFR § 60.482-2 = Pumps in light liquid service are complying with § 60.482-2. Compressors = The fugitive unit does not contain compressors. Pressure Relief Devices in Gas/Vapor Service = The fugitive unit contains pressure relief devices in gas/vapor service. Sampling Connection Systems = The fugitive unit contains sampling connection systems. Equivalent Emission Limitation = No equivalent emission limitation is used for sampling connection systems. Complying with 40 CFR § 60.482-5 = Sampling connection systems are complying with § 60.482-5. Open-ended Valves or Lines = The fugitive unit contains open-ended valves or lines. Equivalent Emission Limitation = No equivalent emission limitation is used for open-ended valves or lines. Complying with 40 CFR § 60.482-6 = Open-ended valves or lines are complying with § 60.482-6. Valves in Gas/Vapor or Light Liquid Service = The fugitive unit contains valves in gas/vapor or light liquid service. 2.0% = The fugitive unit is not complying with an allowable percentage of valves leaking equal to or less than 2.0%. Equivalent Emission Limitation = No equivalent emission limitation is used for valves in gas/vapor or light liquid service. Complying with 40 CFR § 60.482-7 = Valves in gas/vapor or light liquid service are complying with § 60.482-7. Pumps in Heavy Liquid Service = The fugitive unit does not contain pumps in heavy liquid service. Valves in Heavy Liquid Service = The fugitive unit does not contain valves in heavy liquid service. Pressure Relief Devices in Heavy or Light Liquid Service = Fugitive unit does not contain pressure relief devices in heavy or light liquid service. Flanges and Other Connectors = The fugitive unit contains flanges and other connectors. Equivalent Emission Limitation = No equivalent emission limitation is used for flanges and other connectors. Complying with 40 CFR § 60.482-8 = Flanges and other connectors are complying with § 60.482-8. Vapor Recovery System = The fugitive unit does not contain vapor recovery systems. Enclosed Combustion Device = The fugitive unit does not contain enclosed combustion devices. Flare = The fugitive unit does not contain flares. Closed Vent (or Vapor Collection) Systems = The fugitive unit does not contain closed vent or vapor collection systems.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
OX016FG3	40 CFR Part 63, Subpart H	63H-0007	Equipment Type = Fugitive unit contains equipment listed in 40 CFR § 63.160(a) which is operated in organic hazardous air pollutant service. Non-Research and Development/Batch Processes = Fugitive unit contains processes other than research and development facilities and bench-scale batch processes. Vacuum Service = Not all of the equipment in the fugitive unit is in vacuum service. Less than 300 Operating Hours = The fugitive unit does not contain any equipment in organic Hazardous Air Pollutant (HAP) service that is intended to operate less than 300 hours per calendar year. Heavy Liquid Service = None of the equipment in organic HAP service that is intended to operate less than 300 hours per calendar year is in heavy liquid service. AMEL = Fugitive unit source owner/operator is not electing to comply with an alternative means of emission limitation (AMEL). Light Liquid Service (Pumps) = Component present. Heavy Liquid Service (Pumps) = Component not present. Any (Compressors) = Component not present. Gas Vapor Service (Pressure Relief Devices) = Component present. Liquid Service (Pressure Relief Devices) = Component present. Heavy Liquid Service (Pressure Relief Devices) = Component not present. Any (Sampling Connection Systems) = Component present. Heavy Liquid Service (Sampling Connection Systems) = Component not present. Any (Open-ended Valves or Lines) = Component present. Heavy Liquid Service (Open-ended Valves or Lines) = Component not present. Gas/Vapor or Light Liquid Service (Valves) = Component present. Heavy Liquid Service (Valves) = Component not present. Gas/Vapor or Light Liquid Service (Connectors) = Component present. Heavy Liquid Service (Connectors) = Component not present. Gas/Vapor or Light Liquid Service (Agitators) = Component not present. Heavy Liquid Service (Agitators) = Component not present. Any (Instrumentation Systems) = Component present. Heavy Liquid Service (Instrumentation Systems = Component not present. Any (Surge Control Vessels or Bottoms Receivers) = Component present. Heavy Liquid Service (Surge Control Vessels or Bottoms Receivers) = Component not present. Any (Closed-Vent Systems) = Component not present. Recovery or Recapture Devices (Closed-Vent Systems) = Component not present. Enclosed Combustion Devices (Closed-Vent Systems) = Component not present. Flares (Closed-Vent Systems) = Component not present.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Unsafe to Inspect = For a fugitive unit that contains any closed-vent system, there are no parts designated as unsafe to inspect. Difficult to Inspect = Fugitive unit contains any closed-vent system with parts designated as difficult to inspect. Employee Number = The corporation employs 100 or more persons.	
OX011R1	40 CFR Part 63, Subpart FFFF	63FFFF-0005	Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1). Recovery Device = The TRE index is maintained without a recovery device.	
OX011R2	40 CFR Part 63, Subpart FFFF	63FFFF-0005	Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1). Recovery Device = The TRE index is maintained without a recovery device.	
OX011R3	40 CFR Part 63, Subpart FFFF	63FFFF-0005	Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1). Recovery Device = The TRE index is maintained without a recovery device.	
OX011SB2	40 CFR Part 63, Subpart FFFF	63FFFF-0005	Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1). Recovery Device = The TRE index is maintained without a recovery device.	
OX015D1	40 CFR Part 63, Subpart FFFF	63FFFF-0005	Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1). Recovery Device = The TRE index is maintained without a recovery device.	
OX015D2	40 CFR Part 63, Subpart FFFF	63FFFF-0005	Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1). Recovery Device = The TRE index is maintained without a recovery device.	
OX015D503	40 CFR Part 63, Subpart FFFF	63FFFF-0005	Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1). Recovery Device = The TRE index is maintained without a recovery device.	
OX015D513	40 CFR Part 63, Subpart FFFF	63FFFF-0005	Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1). Recovery Device = The TRE index is maintained without a recovery device.	
OX015D514	40 CFR Part 63, Subpart FFFF	63FFFF-0005	Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1). Recovery Device = The TRE index is maintained without a recovery device.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
OX015R1	40 CFR Part 63, Subpart FFFF	63FFFF-0005	Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1). Recovery Device = The TRE index is maintained without a recovery device.	
OX015R501	40 CFR Part 63, Subpart FFFF	63FFFF-0005	Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1). Recovery Device = The TRE index is maintained without a recovery device.	
OX015R503	40 CFR Part 63, Subpart FFFF	63FFFF-0005	Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1). Recovery Device = The TRE index is maintained without a recovery device.	
OX015R508	40 CFR Part 63, Subpart FFFF	63FFFF-0005	Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1). Recovery Device = The TRE index is maintained without a recovery device.	
OX015R509	40 CFR Part 63, Subpart FFFF	63FFFF-0005	Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1). Recovery Device = The TRE index is maintained without a recovery device.	
OX015RT507	40 CFR Part 63, Subpart FFFF	63FFFF-0005	Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1). Recovery Device = The TRE index is maintained without a recovery device.	
OX015RT508	40 CFR Part 63, Subpart FFFF	63FFFF-0005	Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1). Recovery Device = The TRE index is maintained without a recovery device.	
OX015RT584	40 CFR Part 63, Subpart FFFF	63FFFF-0005	Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1). Recovery Device = The TRE index is maintained without a recovery device.	
OX016D17	40 CFR Part 63, Subpart FFFF	63FFFF-0005	Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1). Recovery Device = The TRE index is maintained without a recovery device.	
OX016D19	40 CFR Part 63, Subpart FFFF	63FFFF-0005	Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1). Recovery Device = The TRE index is maintained without a recovery device.	
OX016D22	40 CFR Part 63, Subpart FFFF	63FFFF-0005	Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1).	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Recovery Device = The TRE index is maintained without a recovery device.	
OX016D25	40 CFR Part 63, Subpart FFFF	63FFFF-0005	Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1). Recovery Device = The TRE index is maintained without a recovery device.	
OX016D26	40 CFR Part 63, Subpart FFFF	63FFFF-0005	Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1). Recovery Device = The TRE index is maintained without a recovery device.	
OX016D28	40 CFR Part 63, Subpart FFFF	63FFFF-0005	Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1). Recovery Device = The TRE index is maintained without a recovery device.	
OX016D300	40 CFR Part 63, Subpart G	63G-0001	Overlap = Title 40 CFR Part 60, Subpart NNN Group 1 = The process vent meets the definition of a Group 1 process vent. Electing Control = Electing to control the process vent to the levels required in 40 CFR § 63.113(a)(2) without calculating the TRE index value Control Device = Catalytic incinerator. Halogenated = Vent stream is not halogenated. Performance Test = A performance test was conducted for determining compliance with a regulation promulgated by the EPA using the same methods specified in Subpart G and either no process changes have been made, or the results reliably indicate compliance. Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used. Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118. By-pass Lines = The vent system contains by-pass lines that can divert the vent stream from the control device. Flow Indicator = A flow indicator is installed and operated at the entrance of the by-pass line.	
OX016D301	40 CFR Part 63, Subpart G	63G-0002	Overlap = Title 40 CFR Part 60, Subpart NNN Group 1 = The process vent meets the definition of a Group 1 process vent. Electing Control = Electing to control the process vent to the levels required in 40 CFR § 63.113(a)(2) without calculating the TRE index value Control Device = Catalytic incinerator. Halogenated = Vent stream is not halogenated. Performance Test = A performance test was conducted for determining compliance with a regulation promulgated by the EPA using the same methods specified in Subpart G and either no process changes have been made, or the results reliably indicate compliance.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used. Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118. By-pass Lines = The vent system contains by-pass lines that can divert the vent stream from the control device. Flow Indicator = A flow indicator is installed and operated at the entrance of the by-pass line.	
OX016D302	40 CFR Part 63, Subpart G	63G-0003	Overlap = Title 40 CFR Part 60, Subpart NNN Group 1 = The process vent meets the definition of a Group 1 process vent. Electing Control = Electing to control the process vent to the levels required in 40 CFR § 63.113(a)(2) without calculating the TRE index value Control Device = Catalytic incinerator. Halogenated = Vent stream is not halogenated. Performance Test = A performance test was conducted for determining compliance with a regulation promulgated by the EPA using the same methods specified in Subpart G and either no process changes have been made, or the results reliably indicate compliance. Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used. Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118. By-pass Lines = The vent system contains by-pass lines that can divert the vent stream from the control device. Flow Indicator = A flow indicator is installed and operated at the entrance of the by-pass line.	
OX016R2	40 CFR Part 63, Subpart FFFF	63FFFF-0005	Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1). Recovery Device = The TRE index is maintained without a recovery device.	
OX016R300	40 CFR Part 63, Subpart G	63G-0004	Overlap = Title 40 CFR Part 60, Subpart III Group 1 = The process vent meets the definition of a Group 1 process vent. Electing Control = Electing to control the process vent to the levels required in 40 CFR § 63.113(a)(2) without calculating the TRE index value Control Device = Catalytic incinerator. Halogenated = Vent stream is not halogenated. Performance Test = A performance test was conducted for determining compliance with a regulation promulgated by the EPA using the same methods specified in Subpart G and either no process changes have been made, or the results reliably indicate compliance. Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118. By-pass Lines = The vent system contains by-pass lines that can divert the vent stream from the control device. Flow Indicator = A flow indicator is installed and operated at the entrance of the by-pass line.	
OX016R6	40 CFR Part 63, Subpart FFFF	63FFFF-0005	Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1). Recovery Device = The TRE index is maintained without a recovery device.	
OX011D1	40 CFR Part 60, Subpart NNN	60NNN-0005	Subpart NNN Chemicals = The distillation unit produces any chemical listed in 40 CFR § 60.667 as a product, co-product, by-product, or intermediate. Construction/Modification Date = After December 30, 1983, and on or Before April 25, 2023 Vent Type = Two or more distillation units discharging vent stream into a common vapor recovery system. Distillation Unit Type = Does not qualify for any exemption under § 60.660(c)(1)-(3). Total Design Capacity = 1 gigagram per year or greater. Vent Stream Flow Rate = Flow rate greater than or equal to 0.008 scm/min. Total Resource Effectiveness = TRE index value less than 8.0 not from a halogenated vent stream. TOC Reduction = Compliance is achieved through use of a flare or recovery device. Subpart NNN Control Device = Flare.	
OX011D4	40 CFR Part 60, Subpart NNN	60NNN-0013	Subpart NNN Chemicals = The distillation unit produces any chemical listed in 40 CFR § 60.667 as a product, co-product, by-product, or intermediate. Construction/Modification Date = After December 30, 1983, and on or Before April 25, 2023 Vent Type = Two or more distillation units discharging vent stream into a common vapor recovery system. Distillation Unit Type = Does not qualify for any exemption under § 60.660(c)(1)-(3). Total Design Capacity = 1 gigagram per year or greater. Vent Stream Flow Rate = Flow rate less than 0.008 scm/min.	
OX011D5	40 CFR Part 60, Subpart NNN	60NNN-0005	Subpart NNN Chemicals = The distillation unit produces any chemical listed in 40 CFR § 60.667 as a product, co-product, by-product, or intermediate. Construction/Modification Date = After December 30, 1983, and on or Before April 25, 2023 Vent Type = Two or more distillation units discharging vent stream into a common vapor recovery system. Distillation Unit Type = Does not qualify for any exemption under § 60.660(c)(1)-(3). Total Design Capacity = 1 gigagram per year or greater. Vent Stream Flow Rate = Flow rate greater than or equal to 0.008 scm/min.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Total Resource Effectiveness = TRE index value less than 8.0 not from a halogenated vent stream. TOC Reduction = Compliance is achieved through use of a flare or recovery device. Subpart NNN Control Device = Flare.	
OX011D6	40 CFR Part 60, Subpart NNN	60NNN-0005	Subpart NNN Chemicals = The distillation unit produces any chemical listed in 40 CFR § 60.667 as a product, co-product, by-product, or intermediate. Construction/Modification Date = After December 30, 1983, and on or Before April 25, 2023 Vent Type = Two or more distillation units discharging vent stream into a common vapor recovery system. Distillation Unit Type = Does not qualify for any exemption under § 60.660(c)(1)-(3). Total Design Capacity = 1 gigagram per year or greater. Vent Stream Flow Rate = Flow rate greater than or equal to 0.008 scm/min. Total Resource Effectiveness = TRE index value less than 8.0 not from a halogenated vent stream. TOC Reduction = Compliance is achieved through use of a flare or recovery device. Subpart NNN Control Device = Flare.	
OX011R1	40 CFR Part 60, Subpart RRR	60RRR-0005	Chemicals Listed in 40 CFR § 60.707 = The affected facility is part of a process unit that produces chemicals listed in 40 CFR § 60.707 as a product, co-product, by product, or intermediate. Construction/Modification Date = After June 29, 1990 and on or before April 25, 2023 Affected Facility Type = Combination of two or more reactor processes and the common recovery system into which their vent streams are discharged. Subject to Title 40 CFR Part 60, Subpart DDD = The reactor process is not subject to the provisions of Title 40 CFR Part 60, Subpart DDD. Subject to Title 40 CFR Part 60, Subpart NNN = The vent stream is not routed to a distillation unit subject to Title 40 CFR Part 60, Subpart NNN or has other releases to the air than from a pressure relief valve. TRE Index Value = TRE index value is less than or equal to 8.0 or a TRE index value is not calculated or claimed for exemption 40 CFR § 60.700(c)(2). TRE for Halogenated Vent Stream = TRE index value is being calculated for a nonhalogenated vent stream. Total Design Capacity = Total design capacity is 1 gigagram per year (1,100 tons per year) or greater. Vent Stream Flow Rate = Vent stream flow rate is 0.011 scm/min or greater, or value is not measured. TOC Exemption = No TOC concentration exemption. Control Device = Flare that meets the requirements of 40 CFR § 60.18 Bypass Line = There is a bypass line valve that could divert the vent stream around the control device and directly to the atmosphere.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Bypass Line Valve Secured = The bypass line valve is monitored with a flow indicator.	
OX011R2	40 CFR Part 60, Subpart RRR	60RRR-0005	Chemicals Listed in 40 CFR § 60.707 = The affected facility is part of a process unit that produces chemicals listed in 40 CFR § 60.707 as a product, co-product, by product, or intermediate. Construction/Modification Date = After June 29, 1990 and on or before April 25, 2023 Affected Facility Type = Combination of two or more reactor processes and the common recovery system into which their vent streams are discharged. Subject to Title 40 CFR Part 60, Subpart DDD = The reactor process is not subject to the provisions of Title 40 CFR Part 60, Subpart DDD. Subject to Title 40 CFR Part 60, Subpart NNN = The vent stream is not routed to a distillation unit subject to Title 40 CFR Part 60, Subpart NNN or has other releases to the air than from a pressure relief valve. TRE Index Value = TRE index value is less than or equal to 8.0 or a TRE index value is not calculated or claimed for exemption 40 CFR § 60.700(c)(2). TRE for Halogenated Vent Stream = TRE index value is being calculated for a nonhalogenated vent stream. Total Design Capacity = Total design capacity is 1 gigagram per year (1,100 tons per year) or greater. Vent Stream Flow Rate = Vent stream flow rate is 0.011 scm/min or greater, or value is not measured. TOC Exemption = No TOC concentration exemption. Control Device = Flare that meets the requirements of 40 CFR § 60.18 Bypass Line = There is a bypass line valve that could divert the vent stream around the control device and directly to the atmosphere. Bypass Line Valve Secured = The bypass line valve is monitored with a flow indicator.	
OX011R3	40 CFR Part 60, Subpart RRR	60RRR-0005	Chemicals Listed in 40 CFR § 60.707 = The affected facility is part of a process unit that produces chemicals listed in 40 CFR § 60.707 as a product, co-product, by product, or intermediate. Construction/Modification Date = After June 29, 1990 and on or before April 25, 2023 Affected Facility Type = Combination of two or more reactor processes and the common recovery system into which their vent streams are discharged. Subject to Title 40 CFR Part 60, Subpart DDD = The reactor process is not subject to the provisions of Title 40 CFR Part 60, Subpart DDD. Subject to Title 40 CFR Part 60, Subpart NNN = The vent stream is not routed to a distillation unit subject to Title 40 CFR Part 60, Subpart NNN or has other releases to the air than from a pressure relief valve. TRE Index Value = TRE index value is less than or equal to 8.0 or a TRE index value is not calculated or claimed for exemption 40 CFR § 60.700(c)(2). TRE for Halogenated Vent Stream = TRE index value is being calculated for a nonhalogenated vent stream.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Total Design Capacity = Total design capacity is 1 gigagram per year (1,100 tons per year) or greater. Vent Stream Flow Rate = Vent stream flow rate is 0.011 scm/min or greater, or value is not measured. TOC Exemption = No TOC concentration exemption. Control Device = Flare that meets the requirements of 40 CFR § 60.18 Bypass Line = There is a bypass line valve that could divert the vent stream around the control device and directly to the atmosphere. Bypass Line Valve Secured = The bypass line valve is monitored with a flow indicator.	
OX016R3	40 CFR Part 60, Subpart III	60III-0001	Construction/Modification Date = After October 21, 1983 and on or before April 25, 2023 Affected Facility = Combination of two or more air oxidation reactors and common recovery systems into which their vent streams are discharged. TRE Index Value = TRE index value is not calculated or claimed for exemption in 40 CFR § 60.610(c). Control Device = Catalytic incinerator is used to comply with TOC emission limits.	
OX016R5	40 CFR Part 60, Subpart III	60III-0001	Construction/Modification Date = After October 21, 1983 and on or before April 25, 2023 Affected Facility = Combination of two or more air oxidation reactors and common recovery systems into which their vent streams are discharged. TRE Index Value = TRE index value is not calculated or claimed for exemption in 40 CFR § 60.610(c). Control Device = Catalytic incinerator is used to comply with TOC emission limits.	
PROBUTAC	40 CFR Part 63, Subpart FFFF	63FFFF-0001	Ammonium Sulfate = The MCPU does not include the manufacture of ammonium sulfate as a by-product, or the slurry entering the by-product manufacturing process contains 50 parts per million by weight (ppmw) HAP or less or 10 ppmw benzene or less. Other Operations = The MCPU includes operations other than those listed in § 63.2435(c). 63.100 CMPU = The MCPU is not a CMPU defined in § 63.100. G2/<1000 lb/yr = The process does not include Group 2 batch process vents and/or uncontrolled hydrogen halide and halogen HAP emissions from the sum of all batch and continuous process vents less than 1,000 lb/yr. Startup 2003 = The affected source startup was before November 10, 2003. Shared Batch Vent = The MCPU does not include a batch process vent that also is part of a CMPU as defined in subparts F and G of this part 63. PUG = The MCPU is not part of a process unit group (PUG). Startup 2002 = The affected source initial startup was before April 4, 2002. PP Alt = The MCPU is complying with the emission limitations and work practice standards contained in Tables 1 through 7. >=1000 Lb/Yr = The process has uncontrolled hydrogen halide and halogen HAP emissions from process vents less than 1,000 lb/yr	Added Related Standard § 63.2450(u) to address new requirement based on rule amendment dated 8/12/2020.

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			New Source = The MCPU is an existing affected source. Batch Process Vents = The source does not include batch process vents.	
PROESTER	40 CFR Part 63, Subpart FFFF	63FFFF-0001	Ammonium Sulfate = The MCPU does not include the manufacture of ammonium sulfate as a by-product, or the slurry entering the by-product manufacturing process contains 50 parts per million by weight (ppmw) HAP or less or 10 ppmw benzene or less. Other Operations = The MCPU includes operations other than those listed in § 63.2435(c). 63.100 CMPU = The MCPU is not a CMPU defined in § 63.100. G2/<1000 lb/yr = The process does not include Group 2 batch process vents and/or uncontrolled hydrogen halide and halogen HAP emissions from the sum of all batch and continuous process vents less than 1,000 lb/yr. Startup 2003 = The affected source startup was before November 10, 2003. Shared Batch Vent = The MCPU does not include a batch process vent that also is part of a CMPU as defined in subparts F and G of this part 63. PUG = The MCPU is not part of a process unit group (PUG). Startup 2002 = The affected source initial startup was before April 4, 2002. PP Alt = The MCPU is complying with the emission limitations and work practice standards contained in Tables 1 through 7. >=1000 Lb/Yr = The process has uncontrolled hydrogen halide and halogen HAP emissions from process vents less than 1,000 lb/yr New Source = The MCPU is an existing affected source. Batch Process Vents = The source does not include batch process vents.	Added Related Standard § 63.2450(u) to address new requirement based on rule amendment dated 8/12/2020.
PRONITKET	40 CFR Part 63, Subpart FFFF	63FFFF-0001	Ammonium Sulfate = The MCPU does not include the manufacture of ammonium sulfate as a by-product, or the slurry entering the by-product manufacturing process contains 50 parts per million by weight (ppmw) HAP or less or 10 ppmw benzene or less. Other Operations = The MCPU includes operations other than those listed in § 63.2435(c). 63.100 CMPU = The MCPU is not a CMPU defined in § 63.100. G2/<1000 lb/yr = The process does not include Group 2 batch process vents and/or uncontrolled hydrogen halide and halogen HAP emissions from the sum of all batch and continuous process vents less than 1,000 lb/yr. Startup 2003 = The affected source startup was before November 10, 2003. Shared Batch Vent = The MCPU does not include a batch process vent that also is part of a CMPU as defined in subparts F and G of this part 63. PUG = The MCPU is not part of a process unit group (PUG). Startup 2002 = The affected source initial startup was before April 4, 2002. PP Alt = The MCPU is complying with the emission limitations and work practice standards contained in Tables 1 through 7. >=1000 Lb/Yr = The process has uncontrolled hydrogen halide and halogen HAP emissions from process vents less than 1,000 lb/yr New Source = The MCPU is an existing affected source.	Added Related Standard § 63.2450(u) to address new requirement based on rule amendment dated 8/12/2020.

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Batch Process Vents = The source does not include batch process vents.	
PROPROPAC	40 CFR Part 63, Subpart F	63F-0005	CMPU = Meets all the criteria specified in § 63.100(b)(1)-(3) Heat Exchange System = Heat exchange system's cooling water is monitored for the presence of one or more organic HAP whose presence indicates a leak Flare = A flare is not used to reduce organic HAP emissions	
PROTEXAN	40 CFR Part 63, Subpart FFFF	63FFFF-0001	Ammonium Sulfate = The MCPU does not include the manufacture of ammonium sulfate as a by-product, or the slurry entering the by-product manufacturing process contains 50 parts per million by weight (ppmw) HAP or less or 10 ppmw benzene or less. Other Operations = The MCPU includes operations other than those listed in § 63.2435(c). 63.100 CMPU = The MCPU is not a CMPU defined in § 63.100. G2/<1000 lb/yr = The process does not include Group 2 batch process vents and/or uncontrolled hydrogen halide and halogen HAP emissions from the sum of all batch and continuous process vents less than 1,000 lb/yr. Startup 2003 = The affected source startup was before November 10, 2003. Shared Batch Vent = The MCPU does not include a batch process vent that also is part of a CMPU as defined in subparts F and G of this part 63. PUG = The MCPU is not part of a process unit group (PUG). Startup 2002 = The affected source initial startup was before April 4, 2002. PP Alt = The MCPU is complying with the emission limitations and work practice standards contained in Tables 1 through 7. >=1000 Lb/Yr = The process has uncontrolled hydrogen halide and halogen HAP emissions from process vents less than 1,000 lb/yr New Source = The MCPU is an existing affected source. Batch Process Vents = The source does not include batch process vents.	Added Related Standard § 63.2450(u) to address new requirement based on rule amendment dated 8/12/2020.

* - 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.: 6777	Issuance Date: 08/08/2019
Authorization No.: 9631	Issuance Date: 08/15/2025
Authorization No.: 21832	Issuance Date: 08/05/2026
Authorization No.: 27941	Issuance Date: 01/30/2026
Authorization No.: 78809	Issuance Date: 03/22/2019
Authorization No.: 84724	Issuance Date: 07/29/2025
Authorization No.: 140089	Issuance Date: 06/23/2025
Permits by Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.262	Version No./Date: 11/01/2003
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.264	Version No./Date: 09/04/2000
Number: 106.472	Version No./Date: 09/04/2000
Number: 106.478	Version No./Date: 09/04/2000

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 14. 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

Compliance Assurance Monitoring (CAM):

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

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

1. the emission unit is subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement;

2. the emission unit uses a control device to achieve compliance with the emission limitation or standard specified in the applicable requirement; and

3. the emission unit has the pre-control device potential to emit greater than or equal to the amount in tons per year for a site to be classified as a major source.

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

Unit/Group/Process Information	
ID No.: OX016R3	
Control Device ID No.: 016CU1	Control Device Type: Catalytic incinerator
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart III	SOP Index No.: 60III-0001
Pollutant: VOC/TOC	Main Standard: § 60.612(a)
Monitoring Information	
Indicator: Cat-Ox Inlet Temperature	
Minimum Frequency: Continuously	
Averaging Period: 6 Minutes	
Deviation Limit: Inlet temperature to catalyst bed for catalytic oxidizer less than 530 degrees Fahrenheit when the unit is in operation except during periods of startup, shutdown, and maintenance.	
Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum inlet and outlet gas temperature across the catalyst bed of a catalytic incinerator. These minimum temperatures must be maintained in order for the proper destruction efficiency. Operation below the minimum temperatures will result in incomplete combustion and a loss in the VOC destruction efficiency of the catalytic incinerator. Monitoring the catalyst bed inlet and outlet temperature is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts DD, EE and HH; and 30 TAC Chapter 115.	

Unit/Group/Process Information	
ID No.: OX016R5	
Control Device ID No.: 016CU1	Control Device Type: Catalytic incinerator
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart III	SOP Index No.: 60III-0001
Pollutant: VOC/TOC	Main Standard: § 60.612(a)
Monitoring Information	
Indicator: Cat-Ox Inlet Temperature	
Minimum Frequency: Continuously	
Averaging Period: Six Minutes	
Deviation Limit: Inlet temperature to catalyst bed for catalytic oxidizer less than 530 degrees Fahrenheit when unit is in operation except during periods of startup, shutdown, and maintenance.	
Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum inlet and outlet gas temperature across the catalyst bed of a catalytic incinerator. These minimum temperatures must be maintained in order for the proper destruction efficiency. Operation below the minimum temperatures will result in incomplete combustion and a loss in the VOC destruction efficiency of the catalytic incinerator. Monitoring the catalyst bed inlet and outlet temperature is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts DD, EE and HH; and 30 TAC Chapter 115.	

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 October 24, 2024.
   Site rating: 3.51 / Satisfactory Company rating: 2.06 / 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