

# Statement of Basis of the Federal Operating Permit

DCP Operating Company, LP

Site Name: Sherhan Gas Plant  
Physical Location: 15150 County Road 9  
Nearest City: Gruver  
County: Hansford

Permit Number: O2569  
Project Type: Renewal

The North American Industry Classification System (NAICS) Code: 211130  
NAICS Name: Natural Gas Extraction

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: July 31, 2025

## **Operating Permit Basis of Determination**

### **Permit Area Process Description**

The Sherhan gas plant operates as a booster station/treater. The facility receives natural gas from the surrounding oil and gas fields to treat for the removal of carbon dioxide (CO<sub>2</sub>) and hydrogen sulfide (H<sub>2</sub>S) before it is compressed and sent by pipeline to a downstream natural gas processing plant.

Inlet field gas arrives through separate pipelines to individual inlet receivers (N-Line, M-Line, H-Line, V-Line Como, Carthage, Deep Gas and Hansford). The receivers separate the inlet gas from the condensate and water streams. The liquid streams are routed from the receivers to three (3) spherical storage tanks operating under pressure. The condensate to be stabilized consists of existing condensate stored in the spherical storage tanks plus a new sweet condensate stream to be unloaded from pressurized trucks into the spheres. Water from the spherical storage is sent to three (3)-phase separators (Y2 separators). In the three (3)-phase separators (Y2 separators), water is drained to two (2) 30,000 gallon storage tanks (EPNs: TK-1212 and TK-1213), and any condensate is pumped back to the spherical storage tanks to be sent to the stabilizer. Vapors from the three (3)-phase separators (Y2 separators) are compressed by A-Line Compressor (EPN: ENG-42) and routed to the inlet. The water in the 30,000 gallon storage tanks is sent to the onsite disposal well. Any hydrocarbon that enters the water storage tanks is skimmed and sent to the oil skimmer tank (EPN: TK-1214) and removed by truck (EPN: L-4). Liquids from the compressor interstage scrubbers are routed to the Pressure Drain Tank V-1209. Vapors from the Pressure Drain Tank are compressed by the A-Line Compressor (EPN: ENG 42) to the inlet, water is drained to the two (2) 30,000 gallon storage tanks, and any oil is sent to the Pressure Drain Slop Tank (EPN: TK-1210), which is an atmospheric storage tank, and removed by truck (EPN: L-2).

The stabilized condensate is stored in three (3) 30,000-gallon atmospheric storage tanks. The vents from the atmospheric storage tanks are controlled by using redundant VRUs with control efficiencies of 100% and 0% downtime. The vapor captured by the VRUs is routed to the facility inlet to be processed in a similar manner to the vapor from the stabilizer. The liquids from the atmospheric storage tanks are loaded out to trucks for shipment offsite. The loading vapors from the trucks are vapor balanced back to the atmospheric storage tanks to be controlled by the VRUs. Uncaptured fugitive losses from truck loading are emitted to the atmosphere (EPN: L-5).

Gas streams from the Hansford inlet receivers are routed to inlet compression consisting of four (4) reciprocal internal combustion engines (RICE): EPNs ENG-31A, ENG-32A, ENG-33A, and ENG-38B. The A-Line Inlet consists of one (1) RICE: EPN ENG-42. The vapor from the stabilizer is sent to the facility inlet downstream of the A-line compressor and upstream of the Hansford Compressors to combine with the existing inlet gas. Following inlet compression, the gas is routed through the tube bundle in the WSAC (EPN: WSAC-1) to be cooled prior to entering the existing gas amine treating unit where CO<sub>2</sub> and H<sub>2</sub>S are removed. In the amine contactor, lean amine enters the top of the tower and descends through multiple trays designed to slow the downward flow of the amine through the tower. The gas enters the tower from the bottom and flows upward through the lean amine solution. The rich amine (saturated with CO<sub>2</sub> and H<sub>2</sub>S) exits the bottom of the contactor and is routed to the amine regenerator. The regenerator is heated with hot oil produced from two (2) hot oil waste heat recovery units in the Solar exhaust stacks which strips the H<sub>2</sub>S and CO<sub>2</sub>, converting the rich to lean amine (regeneration) and returned to the process. The acid gas from the regeneration is routed to the flare (EPN: FLR-1) for destruction.

After the gas leaves the amine treater, the gas is compressed by the two (2) Solar turbines and routed through the tube bundle in the WSAC to be cooled prior to entering the mole sieve dehydration unit where water fractions are removed. The mole sieve is regenerated using a slipstream of dry gas, which is heated by an exchanger using heat from the hot oil from the Waste Heat recovery units on the stacks of the two (2) Solar turbines, which then passes through the saturated bed, drying the bed. The saturated hot gas is then recombined upstream of the mole sieve to be dried.

After the gas is dried, the gas is sent to the pipeline for further processing by a downstream facility.

### **FOPs at Site**

The "application area" consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: None

## Major Source Pollutants

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

Major Pollutants	VOC, SO <sub>2</sub> , NO <sub>x</sub> , CO
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## Reading State of Texas's Federal Operating Permit

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

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

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

### General Terms and Conditions

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

### Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on an OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction

authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

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

## Attachments

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

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

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

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

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

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

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

## Appendix A

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

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

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number

of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirements Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

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

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

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

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

#### **Stationary Vents subject to 30 TAC Chapter 111 not addressed in the Special Terms and Conditions**

All other stationary vents subject to 30 TAC Chapter 111 not covered in the Special Terms and Conditions are listed in the permit's Applicable Requirements Summary. The basis for the applicability determinations for these vents are listed in the Determination of Applicable Requirements table.

#### **Federal Regulatory Applicability Determinations**

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

<b>Regulatory Program</b>	<b>Applicability (Yes/No)</b>
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

Regulatory Program	Applicability (Yes/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 <sub>2</sub> 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](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](http://www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html).

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

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

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

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

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

## **Operational Flexibility**

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



requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

### Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
EMER ENG	40 CFR Part 60, Subpart IIII	60IIII-002	<p>Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification after 07/11/2005.</p> <p>Exemptions = The CI ICE is not exempt due to national security, testing at an engine test cell/stand or as a temporary replacement.</p> <p>Service = CI ICE is an emergency engine.</p> <p>Commencing = CI ICE was newly constructed after 07/11/2005</p> <p>Manufacture Date = Date of manufacture was after 04/01/2006.</p> <p>Diesel = Diesel fuel is used.</p> <p>Displacement = Displacement is less than 10 liters per cylinder and engine is a constant-speed engine.</p> <p>Model Year = CI ICE was manufactured in model year 2012.</p> <p>Kilowatts = Power rating greater than or equal to 130 KW and less than or equal to 368 KW.</p> <p>AECD = The CI ICE is not equipped with auxiliary emission control devices (AECDs) pursuant to the requirements of 40 CFR 1039.665</p> <p>Standard = The emergency CI ICE does not meet the Tier 1, 2, 3, or 4 standards applicable to non-emergency engines (for the same KW and model year)</p> <p>Compliance Option = The CI ICE and control device is installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions.</p>	
EMER ENG	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-004	<p>HAP Source = The site is an area source of hazardous air pollutants as defined in 40 CFR § 63.2</p> <p>Brake HP = Stationary RICE with a brake HP greater than or equal to 300 HP and less than or equal to 500 HP.</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006.</p>	
ENG 31A	40 CFR Part 60, Subpart JJJJ	60JJJJ-001	<p>Construction/Reconstruction/Modification Date = The stationary spark ignition (SI) internal combustion engine (ICE) commenced construction, reconstruction or modification prior to June 12, 2006.</p>	
ENG 31A	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-001	<p>HAP Source = The site is an area source of hazardous air pollutants as defined in 40 CFR § 63.2</p> <p>Brake HP = Stationary RICE with a brake HP greater than 500 HP.</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.</p> <p>Nonindustrial Emergency Engine = Stationary RICE is not defined in 40 CFR §63.6675 as a residential emergency RICE, a commercial emergency RICE, or an institutional emergency RICE.</p> <p>Service Type = Normal use.</p> <p>Stationary RICE Type = Remote 4 stroke spark ignited rich burn engine.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Different Schedule = Schedule specified in Subpart ZZZZ for submission of reports applies.</p> <p>Emission Limitation = Reducing formaldehyde emission by 76% or greater</p> <p>Performance Test = A performance test has been previously conducted that meets the conditions in 40 CFR § 63.6610(d)(1)-(5).</p> <p>Control Technique = Non-selective catalytic reduction</p> <p>Operating Limits = Using the control techniques approved in Subpart ZZZZ</p> <p>Monitoring System = Continuous parameter monitoring system</p>	
ENG 32A	40 CFR Part 60, Subpart JJJJ	60JJJJ-001	Construction/Reconstruction/Modification Date = The stationary spark ignition (SI) internal combustion engine (ICE) commenced construction, reconstruction or modification prior to June 12, 2006.	
ENG 32A	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-001	<p>HAP Source = The site is an area source of hazardous air pollutants as defined in 40 CFR § 63.2</p> <p>Brake HP = Stationary RICE with a brake HP greater than 500 HP.</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.</p> <p>Nonindustrial Emergency Engine = Stationary RICE is not defined in 40 CFR §63.6675 as a residential emergency RICE, a commercial emergency RICE, or an institutional emergency RICE.</p> <p>Service Type = Normal use.</p> <p>Stationary RICE Type = Remote 4 stroke spark ignited rich burn engine.</p> <p>Manufacture Date = The stationary RICE was manufactured prior to January 1, 2008.</p> <p>Different Schedule = Schedule specified in Subpart ZZZZ for submission of reports applies.</p> <p>Emission Limitation = Reducing formaldehyde emission by 76% or greater</p> <p>Performance Test = A performance test has been previously conducted that meets the conditions in 40 CFR § 63.6610(d)(1)-(5).</p> <p>Control Technique = Non-selective catalytic reduction</p> <p>Monitoring System = Continuous parameter monitoring system</p>	
ENG 33A	40 CFR Part 60, Subpart JJJJ	60JJJJ-001	Construction/Reconstruction/Modification Date = The stationary spark ignition (SI) internal combustion engine (ICE) commenced construction, reconstruction or modification prior to June 12, 2006.	
ENG 33A	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-001	<p>HAP Source = The site is an area source of hazardous air pollutants as defined in 40 CFR § 63.2</p> <p>Brake HP = Stationary RICE with a brake HP greater than 500 HP.</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Nonindustrial Emergency Engine = Stationary RICE is not defined in 40 CFR §63.6675 as a residential emergency RICE, a commercial emergency RICE, or an institutional emergency RICE.</p> <p>Service Type = Normal use.</p> <p>Stationary RICE Type = Remote 4 stroke spark ignited rich burn engine.</p> <p>Manufacture Date = The stationary RICE was manufactured prior to January 1, 2008.</p> <p>Different Schedule = Schedule specified in Subpart ZZZZ for submission of reports applies.</p> <p>Emission Limitation = Reducing formaldehyde emission by 76% or greater</p> <p>Crankcase = The stationary CI RICE is not equipped with a closed crankcase ventilation system.</p> <p>Performance Test = A performance test has been previously conducted that meets the conditions in 40 CFR § 63.6610(d)(1)-(5).</p> <p>Control Technique = Non-selective catalytic reduction</p> <p>Operating Limits = Using the control techniques approved in Subpart ZZZZ</p> <p>Monitoring System = Continuous parameter monitoring system</p>	
ENG 38B	40 CFR Part 60, Subpart JJJJ	60JJJJ-001	Construction/Reconstruction/Modification Date = The stationary spark ignition (SI) internal combustion engine (ICE) commenced construction, reconstruction or modification prior to June 12, 2006.	
ENG 38B	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-001	<p>HAP Source = The site is an area source of hazardous air pollutants as defined in 40 CFR § 63.2</p> <p>Brake HP = Stationary RICE with a brake HP greater than 500 HP.</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.</p> <p>Nonindustrial Emergency Engine = Stationary RICE is not defined in 40 CFR §63.6675 as a residential emergency RICE, a commercial emergency RICE, or an institutional emergency RICE.</p> <p>Service Type = Normal use.</p> <p>Stationary RICE Type = Remote 4 stroke spark ignited rich burn engine.</p> <p>Different Schedule = Schedule specified in Subpart ZZZZ for submission of reports applies.</p> <p>Emission Limitation = Reducing formaldehyde emission by 76% or greater</p> <p>Performance Test = A performance test has been previously conducted that meets the conditions in 40 CFR § 63.6610(d)(1)-(5).</p> <p>Control Technique = Non-selective catalytic reduction</p> <p>Operating Limits = Using the control techniques approved in Subpart ZZZZ</p> <p>Monitoring System = Continuous parameter monitoring system</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
ENG 42	40 CFR Part 60, Subpart JJJJ	60JJJJ-001	Construction/Reconstruction/Modification Date = The stationary spark ignition (SI) internal combustion engine (ICE) commenced construction, reconstruction or modification prior to June 12, 2006.	
ENG 42	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-003	<p>HAP Source = The site is an area source of hazardous air pollutants as defined in 40 CFR § 63.2</p> <p>Brake HP = Stationary RICE with a brake HP greater than or equal to 300 HP and less than or equal to 500 HP.</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.</p> <p>Nonindustrial Emergency Engine = Stationary RICE is not defined in 40 CFR §63.6675 as a residential emergency RICE, a commercial emergency RICE, or an institutional emergency RICE.</p> <p>Service Type = Normal use.</p> <p>Stationary RICE Type = 4 stroke spark ignited lean burn engine.</p> <p>Different Schedule = Schedule specified in Subpart ZZZZ for submission of reports applies.</p> <p>Emission Limitation = Limiting the concentration of carbon monoxide in the stationary RICE exhaust.</p> <p>Performance Test = No previous performance test used, a performance test is conducted to demonstrate initial compliance</p> <p>Control Technique = Oxidation catalyst</p> <p>Monitoring System = Continuous emission monitoring system</p>	
EGTK-1	40 CFR Part 60, Subpart Kb	60Kb-003	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 10,600 gallons but less than 19,813 gallons (capacity is greater than 40,000 liters but less than or equal to 75,000 liters)</p>	
TK-1210	40 CFR Part 60, Subpart Kb	60KB-007	<p>Product Stored = Petroleum (other than crude oil) or condensate stored, processed, and/or treated prior to custody transfer</p> <p>Storage Capacity = Capacity is less than or equal to 420,000 gallons (1,589,874 liters)</p>	
TK-1210	40 CFR Part 60, Subpart OOOO	60OOOO-001	<p>Construction/Modification Date = After 8/23/2011 and on/before 9/18/2015</p> <p>Compliance Subject to Another Subpart = Storage vessel is not subject to 40 CFR Part 60, Subpart Kb or 40 CFR Part 63, Subparts G, CC, HH, or WW.</p> <p>Potential to Emit = Potential to emit is less than 6 tpy of VOC</p>	
TK-837	40 CFR Part 60, Subpart OOOOb	60OOOOOb-0001	Construction/Reconstruction/Modification Date = After December 6, 2022	The rule citations were determined from an analysis of the rule text and the basis of determination.
TK-838	40 CFR Part 60, Subpart OOOOb	60OOOOOb-0001	Construction/Reconstruction/Modification Date = After December 6, 2022	The rule citations were determined from an analysis of the rule text and the basis of determination.

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
TK-839	40 CFR Part 60, Subpart OOOOb	60OOOOb-0001	Construction/Reconstruction/Modification Date = After December 6, 2022	The rule citations were determined from an analysis of the rule text and the basis of determination.
TK-DIESEL	40 CFR Part 60, Subpart Kb	60Kb-009	Product Stored = Petroleum liquid (other than petroleum or condensate) Storage Capacity = Capacity is greater than or equal to 10,600 gallons but less than 19,813 gallons (capacity is greater than 40,000 liters but less than or equal to 75,000 liters)	
TK-GASOLINE	40 CFR Part 60, Subpart Kb	60Kb-010	Product Stored = Petroleum liquid (other than petroleum or condensate) Storage Capacity = Capacity is greater than or equal to 10,600 gallons but less than 19,813 gallons (capacity is greater than 40,000 liters but less than or equal to 75,000 liters)	
TK-GASOLINE	40 CFR Part 63, Subpart CCCCCC	63CCCCC-001	Monthly Throughput = The Gasoline Dispensing Facility has a monthly throughput of 10,000 gallons of gasoline or more but less than 100,000 gallons. Capacity = The gasoline storage tank has a capacity of greater than 2000 gallons. Fill Pipe = It can be demonstrated that the liquid level in the gasoline storage tank is always above the entire opening of the fill pipe. Submerged Fill = Prior to 01/10/2008 the gasoline storage tank was operating in compliance with an enforceable rule or permit that requires submerged fill as specified in §63.11117(b).	
FLR-1	30 TAC Chapter 111, Visible Emissions	R1111-0001	Acid Gases Only = Flare is used only as an acid gas flare as defined in 30 TAC § 101.1. 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.	
FLR-1	40 CFR Part 60, Subpart A	60A-001	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)	
FLR-1	40 CFR Part 63, Subpart A	63A-001	Required Under 40 CFR Part 63 = Flare is not required by a Subpart under 40 CFR Part 63.	
AMINE TREATER	30 TAC Chapter 112, Sulfur Compounds	112-01	Sulfur Recovery Plant = The gas sweetening unit is not using sulfur recovery.	
AMINE TREATER	40 CFR Part 60, Subpart LLL	60LLL-01	Onshore = The sweetening unit is located onshore at a gas processing plant. Construction Date = After January 20, 1984 and on or before August 23, 2011.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Acid Gas Vented = Acid gas is vented (acid gas is not completely reinjected into oil- or gas-bearing strata or is otherwise released into the atmosphere [burning is considered to be a release into the atmosphere]).</p> <p>Design Capacity = Design capacity is less than 2 long tons/day.</p>	
AMINE TREATER	40 CFR Part 60, Subpart OOOO	60OOOO-002	Construction/Modification Date = Before 8/23/2011	
AMINE TREATER	40 CFR Part 60, Subpart OOOOa	60OOOOa-001	Construction/Modification Date = On or before September 18, 2015	
ENG 36B	40 CFR Part 60, Subpart KKKK	60KKKK-01	<p>Unit Type = Combined Heat and Power Combustion Turbine</p> <p>Construction/Modification Date = Turbine was modified after February 18, 2005.</p> <p>Heat Input = Turbine has a heat input at peak load of at least 10 MMBtu per hour but less than 50 MMBtu per hour.</p> <p>Subject to Da = The combustion turbine is not located at an integrated gasification combined cycle electric utility steam generating unit subject to Subpart Da of Part 60.</p> <p>Service Type = Service other than emergency service, as defined in § 60.4420(i), or research and development.</p> <p>NOx Standard = The output-based NO<sub>x</sub> emission standard in Table 1 is being used.</p> <p>Fuel Type = 100% natural gas.</p> <p>75% of Peak = The combustion turbine does not operate at less than 75% of peak load or at temperatures less than zero degrees F.</p> <p>Turbine Use = Turbine is used for mechanical drive.</p> <p>NOx Control = NO<sub>x</sub> emissions are not being controlled by steam or water injection.</p> <p>NOx Monitoring = Compliance is demonstrated with annual performance tests.</p> <p>Common Steam Header = A steam header is not utilized.</p> <p>Duct Burner = The heat recovery system does not include a duct burner.</p> <p>Location = The turbine is not located in a noncontinental area nor in a continental area for which the Administrator has determined does not have access to natural gas and that the removal of sulfur compounds would do more environmental harm than benefit.</p> <p>SO<sub>2</sub> Standard = The heat input based SO<sub>2</sub> emission standard in § 60.4330(a)(2) or (a)(3) is being used.</p> <p>Fuel Monitoring = All fuels used are demonstrated not to exceed the potential emissions standard in § 60.4365.</p> <p>Fuel Quality = Fuel is demonstrated not to exceed emission standard by representative fuel sampling data.</p> <p>Performance Test = Sulfur content of the fuel combusted in the turbine is being periodically determined.</p>	
ENG 37B	40 CFR Part 60, Subpart KKKK	60KKKK-01	<p>Unit Type = Combined Heat and Power Combustion Turbine</p> <p>Construction/Modification Date = Turbine was modified after February 18, 2005.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Heat Input = Turbine has a heat input at peak load of at least 10 MMBtu per hour but less than 50 MMBtu per hour.</p> <p>Subject to Da = The combustion turbine is not located at an integrated gasification combined cycle electric utility steam generating unit subject to Subpart Da of Part 60.</p> <p>Service Type = Service other than emergency service, as defined in § 60.4420(i), or research and development.</p> <p>NOx Standard = The output-based NO<sub>x</sub> emission standard in Table 1 is being used.</p> <p>Fuel Type = 100% natural gas.</p> <p>75% of Peak = The combustion turbine does not operate at less than 75% of peak load or at temperatures less than zero degrees F.</p> <p>Turbine Use = Turbine is used for mechanical drive.</p> <p>NOx Control = NO<sub>x</sub> emissions are not being controlled by steam or water injection.</p> <p>NOx Monitoring = Compliance is demonstrated with annual performance tests.</p> <p>Common Steam Header = A steam header is not utilized.</p> <p>Duct Burner = The heat recovery system does not include a duct burner.</p> <p>Location = The turbine is not located in a noncontinental area nor in a continental area for which the Administrator has determined does not have access to natural gas and that the removal of sulfur compounds would do more environmental harm than benefit.</p> <p>SO<sub>2</sub> Standard = The heat input based SO<sub>2</sub> emission standard in § 60.4330(a)(2) or (a)(3) is being used.</p> <p>Fuel Monitoring = All fuels used are demonstrated not to exceed the potential emissions standard in § 60.4365.</p> <p>Fuel Quality = Fuel is demonstrated not to exceed emission standard by representative fuel sampling data.</p> <p>Performance Test = Sulfur content of the fuel combusted in the turbine is being periodically determined.</p>	
ENG 6	40 CFR Part 60, Subpart GG	60GG-001	<p>Peak Load Heat Input = Heat Input is greater or equal to 10 MMBtu/hr (10.7 GJ/hr) and less than or equal to 100 MMBtu/hr (107.2 GJ/hr).</p> <p>Construction/Modification Date = On or before October 3, 1977.</p>	
FUG	40 CFR Part 60, Subpart KKK	60KKK-001	Facility Type = Facility neither a compressor nor an affected facility as defined in 60.630(a)(3).	
FUG-VHP	40 CFR Part 60, Subpart KKK	60KKK-02	Facility Type = Facility neither a compressor nor an affected facility as defined in 60.630(a)(3).	
VRUCOMP1	40 CFR Part 60, Subpart OOOOb	60OOOOOb-0003	<p>Construction/Reconstruction/Modification Date = After December 6, 2022</p> <p>Affected Facility Type = Centrifugal compressor</p>	The rule citations were determined from an analysis of the rule text and the basis of determination.
VRUCOMP2	40 CFR Part 60, Subpart OOOOb	60OOOOOb-0003	<p>Construction/Reconstruction/Modification Date = After December 6, 2022</p> <p>Affected Facility Type = Centrifugal compressor</p>	The rule citations were determined from an analysis of the rule text and the basis of determination.



Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
PROC-1	30 TAC Chapter 111, Visible Emissions	111A-001	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = On or before January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.</p>	

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

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

## NSR Versus Title V FOP

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

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

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

## New Source Review Requirements

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

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. Permit by Rule (PBR) registrations submitted by permittees are also available online through the link provided below. The following table specifies the PBRs that apply to the site.

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

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

<b>Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits by Rule, PSD Permits, or NA Permits) for the Application Area.</b>	
Authorization No.: 73394	Issuance Date: 06/04/2024
Authorization No.: 81696	Issuance Date: 01/12/2017
<b>Permits by Rule (30 TAC Chapter 106) for the Application Area</b>	
Number: 106.352	Version No./Date: 11/22/2012
Number: 106.359	Version No./Date: 09/10/2013
Number: 106.371	Version No./Date: 09/04/2000
Number: 106.472	Version No./Date: 09/04/2000
Number: 106.473	Version No./Date: 09/04/2000
Number: 106.511	Version No./Date: 09/04/2000
Number: 106.512	Version No./Date: 06/13/2001
Number: 66	Version No./Date: 11/05/1986
Number: 82	Version No./Date: 05/05/1976

#### **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 9. The EPA gives States broad discretion in prescribing monitoring, recordkeeping, and reporting for generally applicable requirements that cover insignificant emission units. (see EPA *White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program*). Federal regulations specifically identify recordkeeping as an appropriate level of monitoring necessary to assure compliance with the requirements applicable to an emissions unit. Permitting authorities have the best sense of where it is appropriate to conclude that periodic monitoring is not necessary for IEUs, when state program rules already provide sufficient monitoring for these units.

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

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

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

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

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

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

### **Monitoring Sufficiency**

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

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

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

**Periodic Monitoring:**

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

Unit/Group/Process Information	
ID No.: FLR-1	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111-0001
Pollutant: Opacity	Main Standard: § 111.111(a)(4)(A)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: once per calendar quarter	
Averaging Period: n/a	
Deviation Limit: Visible emissions greater than 20%	
Basis of monitoring: The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations. The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.	

Unit/Group/Process Information	
ID No.: PROC-1	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: 111A-001
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(A)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: once per calendar quarter	
Averaging Period: n/a	
Deviation Limit: Visible emissions shall not exceed 30% opacity averaged over a six-minute period.	
Basis of monitoring: The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations. The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.	

## 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](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](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](http://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](http://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](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 February 19, 2025.

Site rating: 0.00 / High Company rating: 1.32 / 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