

# Statement of Basis of the Federal Operating Permit

Skeeter Products, Inc.

Site Name: Skeeter Products  
Area Name: Skeeter Products  
Physical Location: 1 Skeeter Rd  
Nearest City: Kilgore  
County: Gregg

Permit Number: O4737  
Project Type: Initial Issuance

The North American Industry Classification System (NAICS) Code: 336612  
NAICS Name: Boat Building

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). An application for initial permit issuance has been submitted in accordance with 30 TAC § 122.201. 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 17, 2025

## **Operating Permit Basis of Determination**

### **Permit Area Process Description**

Fiberglass Boats are manufactured in a step-wise process beginning with the boat hull mold preparation through the final trim and accessory installation at the Skeeter facility. The process begins with development of a mold to manufacture multiple copies of a specific boat design. Steel and aluminum trailers are manufactured using welding equipment and coated in enclosed booths within the trailer plant. A detailed description of each phase of the boat manufacturing process is as follows:

#### **1.1 Hull and Deck Fabrication**

The boats are essentially built from the outside in. Molds are prepared by applying a specialized paste wax to the mold to act as a release agent. The prepared deck and hull molds are then stationed in their respective gelcoat spray booths for application of an exterior clear gelcoat, followed by a base color gelcoat resin, and finally various contrasting color gelcoats. Skeeter uses air-assisted airless application equipment and controlled spray techniques as outlined in the CFA Controlled Spray Handbook for production gelcoating operations.

After gelcoating, the molds are wheeled to the laminating area where fiberglass and resin are applied to provide structural support to the outer gelcoat "skin". In the first step of the lamination process, flowchoppers are used to apply resin mixed with chopped fiberglass. Flowchoppers are used for chop and wetout operations to minimize styrene emissions. The resulting surface is smoothed with hand rollers and additional resin is added, where necessary, with wetout guns or with rollers (hand lay-up). The next lamination step is the addition of fiberglass cloth and mat by hand. The fiberglass is saturated with resin using rollers, brushes, or flowchoppers.

In the laminating area, several smaller components such as hatch lids are manufactured using Vacuum Resin Transfer Molding (VRTM). This type of laminating meets the definition for closed molding operations as defined in 40 CFR §63.5779. This manufacturing process is recognized as a low-emitting best available control technique for laminating operations.

Composite transoms, purchased from an off-site supplier, are placed in the hull section. Other wood products, heavy felt, and polyester resin putty may also be added for structural support, depending on the boat design. A plywood or pre-manufactured composite base is added to the deck section. Live wells, rod boxes, gas tanks and other features are secured to the deck. Strips of fiberglass and resin are used to secure or mold transoms, stringers, wood bases, and other features to the fiberglass shell. A polyisocyanate foam is then injected or sprayed to areas of the deck and hull sections for flotation. Foam insulation is added to the outside of live wells and coolers attached to the deck.

Emissions from gelcoat operations include VOC, Styrene, and MMA and are represented as materials are used from FIN GCUNIT01-GCUNIT04 and GCUNIT14 from their respective EPNs: GCB01-GCB04 and GCB14.

Emissions from lamination include VOC and Styrene. Emissions are assumed equally distributed between FINs LAM05-LAM13 and their respective EPNs: LU05-LU13.

#### **1.2 Trim and Finishing**

After lamination, the boat deck and hulls are removed from the molds and wheeled to one of two grinding booths where excess resin and fiberglass lip is cut and ground off the finished sections using hand-held tools. The grinding booths are filtered and the exhaust returns inside the building. A white gelcoat is manually applied by brush to some interior areas of the hull and deck. A black lacquer paint is applied to give a splatter type appearance to the surface. In addition, small cans of black spray paint are used for touch up and darkening of interior areas in the boat. After trimming, the hull and deck are fitted together and secured at all contact points with resin or putty along the outside seam, as well as being fastened together with rivets or screws. Small spray guns are used in the finishing area to touch up scratches.

Carpet is then installed on the boat's deck. Contact cement is applied to the carpet backing and the deck with an air assisted airless sprayer to glue the carpet in place. The boat is then wheeled to the final assembly area where trim, decals, seats, and electronics are installed to finish out the boat.

Emissions from trimming includes PM, PM2.5, and PM10 and is assumed equally distributed between FINs TRIM01 and TRIM02 and emitted equally from EPNs LU05- LU13.

Emissions from surface coating operations in the lamination area includes VOC, ES(Acetone), PM, PM2.5, and PM10. These emissions are represented in the EI from FIN COAT1 and emitted equally from EPNs LU05-LU13.

Emissions from adhesive application in the lamination area includes VOC. These emissions are represented as equally distributed from FINs ADH01 and ADH02 and equally emitted from EPNs LU05-LU13.

### 1.3 Gelcoat and Laminate Mixing

Gelcoat resin and lamination resin mixing occurs near the respective application areas. Components are mixed at the point of application using a plural component delivery system. A small amount of manual mixing occurs in the lamination area for reinforcing composite strakes. Emissions from gelcoat mixing operations are fugitive into the gelcoat and lamination areas of the manufacturing building.

### 1.4 Chemical Storage

Unsaturated polyester resin is stored in two eight-foot diameter vertical tanks in the chemical storage room located east of the manufacturing floor. The tanks vent to the atmosphere through separate two inch gooseneck vent pipes. Capacities of these tanks were verified at approximately 5,000 gal. each. These two tanks are the original tanks that were represented and subsequently placed into service as a result of the initial application for NSR Permit No. 23270.

Polyurethane foam components are stored in pressurized portable tanks which are not vented. Contact cement used from gluing upholstery is stored in large portable containers ("tote" tanks).

Emissions from resin storage tanks include Styrene(VOC) and are represented in the EI from FINs VNTR01 and VNTR02 and are emitted from EPNs VNTR01 and VNTR02.

### 1.5 Upholstery Shop

A section of the administrative building is used for sewing upholstery and boat covers. Chemical usage in the upholstery shop is minor and infrequent, and is generally limited to inks used to silkscreen logos onto upholstered items.

Emissions from adhesive application within the upholstery shop include VOC. These emissions are represented in the EI from FIN ADH03 and are emitted from EPN ADH03.

### 1.6 Woodshop

Skeeter cuts plywood in the woodshop to make miscellaneous support products. Skeeter purchases most of the support material pre-cut, therefore the woodshop throughput is low and sporadic. Woodshop equipment consists of small, hand-held skill saws, table saws, and band saws which do not have or need a central dust collection system. Sawdust settles on the woodshop floor and is periodically swept up.

### 1.7 Warranty Repair

Repair work (rework and warranty repair) is performed in the warranty repair area. Work typically involves filling cracks or chips in a boat's deck or hull with resin and touching up with pigmented and clear gelcoats. Resin application is usually done by hand while gelcoat is spray applied. Once the gelcoat is cured, hand tools are used to grind and polish the repair.

Emissions from warranty repair work includes VOC, Styrene, and MMA. These emissions are represented in the EI from FIN FUG04 and emitted from EPN FUG04.

### 1.8 Research and Development

Research and Development (R&D) is responsible for development and testing of new boat designs. R&D makes "plugs" (full scale models of deck and hull designs) from which molds are made. R&D uses putties and pastes (e.g., unsaturated polyester resins and fillers) to build plugs. Grinding, sanding, and polishing produces a finished plug which can be used to make molds. The deck and hull molds are produced by building up tooling gelcoat and laminate over a plug. The gelcoat

is spray-applied while the laminate resin is a hand lay-up operation. It is important to note that research and development activities are exempt from the requirements of MACT VVVV under §63.5683(d).

Emissions from R&D operations include VOC, Styrene, and MMA. These emissions are represented in the EI from FIN RD01 and emitted from EPN RD01.

## 1.9 Cleanup Procedures

All application equipment is cleaned in the gelcoating booths. Aquawash, an acetone replacement which is a non-hazardous, aqueous based detergent, is used to clean rollers and other hand held equipment. The spent cleaner is collected in containers for disposal and properly managed as a universal waste. One solvent based degreasing unit is located near the gelcoat booths and is used intermittently to clean miscellaneous application equipment.

Citrus Cleaner, a non-volatile dibasic ester, is used on rags to clean paint and adhesive residue from boat finishes. Particulate matter (which consists of resin/fiberglass grinding dust and cured resin) collected on filters or removed from baffle boxes are collected and disposed of at an authorized facility. Solid wastes also include the floor sweep which is periodically collected for disposal.

## 1.10 Trailer Construction

Steel and aluminum trailers are produced by forming raw steel and aluminum using metal benders and templates. Manual welding equipment is used to build each trailer from the ground up. Welding operations are permitted by Permit by Rule. After welding is complete aluminum trailers move on to the finishing line while steel trailers go through wet bead blasting for surface conditioning and then through a phosphate wash to prepare the surface for coatings. Both of these processes are covered by Permit by Rule.

## 1.11 Steel Trailer Coating

Each steel trailer gets a coat of a two part primer which is spray applied within the Primer Booth. The primer booth is totally enclosed and equipped with particulate filters. Primer application equipment is cleaned after each use to prevent equipment failure using a low VOC cleaning solution.

After primer, each trailer receives a textured coating, much like bedliner, called toughcoat. The toughcoat is applied in a totally enclosed booth. Particulate filters are utilized to capture PM from toughcoat application. Toughcoat applicators are cleaned after each use using the same low VOC cleaner.

Once the toughcoat has dried each trailer receives a small amount of pin striping paint and black enamel on the trailer tongue. These coatings are two-part gel-coat coatings which use an activator. These coatings are applied in a totally enclosed booth. This booth also employs particulate filters to capture any particulates from overspray. Application equipment is cleaned after each use with the same low VOC cleaner.

Cleaner is sprayed through application equipment into a bucket which is then reused to clean other sprayers until it is spent and sent to an appropriate disposal facility. Cleaner buckets are covered when not in use.

Emissions from trailer coating include VOC, PM, PM<sub>2.5</sub>, PM<sub>10</sub>, and ES. These emissions are represented in the EI from FIN TRLRCOAT at EPN EPN-001

## 1.12 Trailer Adhesive

Carpet is applied to each trailer as it is finished using the same HVLP application guns as are used in the boat plant. These applicators form large droplets and do not emit PM due to droplet size and stickiness of the glue. This process is permitted by rule.

Emissions from adhesive application in the trailer plant include VOC, Styrene, and Acetone(ES). These emissions are represented in the EI from FIN ADH at EPN EPN- 001.

## 1.13 Fender Molding

FRP fenders are built for each trailer using a closed molding process and controlled spray gelcoat technique. Pigmented gelcoat is applied to the fender mold via HVLP spray guns using controlled spray methods and within an enclosed booth.

After gelcoat application, resin is applied via VARTM (Vacuum Assisted Resin Transfer Molding), which is a closed molding process that uses pressure to distribute resin throughout the reinforcing fabric placed between to mold surfaces to either saturate the fabric or fill the mold cavity. VARTM is virtually a zero emit process. The fenders are allowed to completely dry before trimming occurs within the trim booth. Emissions from the spray and trimming operations are filtered by the fender spray and trim booths and ventilated to EPN 001 within the trailer plant. Fenders will then be removed, prepped, and installed on finished trailers within the trailer plant.

Emissions from fender construction include Styrene(VOC) from the gelcoat and resin applications and PM from trimming. These emissions are represented in the EI from FIN FENDER out of EPN EPN-001.

#### 1.14 Small Parts Production

Small parts are built in the small parts facility permitted in the 2023 issuance of NSR 23270. Small fiberglass parts are gelcoated in 2 gelcoat booths. From gelcoat, parts proceed to either the open mold or closed mold (RTM) lamination booth/area. After lamination is complete, parts are trimmed in the Small Parts trim booth. Any parts requiring repair or touchup are repaired in the gelcoat/lamination repair booth. Molds are maintained and lubricated in the mold maintenance booth inside the small parts building. The small parts building includes a single AST for open mold resin and two smaller ASTs for closed mold resin. Gelcoats are stored and mixed in the Small Parts Gelcoat room which is similar in design to the boat plant. Emission from all of these processes are discharged from a single stack deemed EPN SP01.

#### FOPs at Site

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

Additional FOPs: None

#### Major Source Pollutants

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

Major Pollutants	VOC, HAPS
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#### Reading State of Texas’s Federal Operating Permit

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

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

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

- Unit Summary
  - Applicable Requirements Summary
- Additional Monitoring Requirements
- Permit Shield
- New Source Review Authorization References
- Compliance Plan
- Alternative Requirements
- Appendix A
  - Acronym list

## General Terms and Conditions

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

## Special Terms and Conditions

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

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

## Attachments

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

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

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

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that

compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

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

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

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

#### Appendix A

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

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

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable 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.

#### **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	No
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	No
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	Yes
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**
EQCLEAN	40 CFR Part 63, Subpart VVVV	63VVVV-1	Unit type = process Date constructed/placed in service = on/after compliance date - 117.540	The rule citations were determined from analysis of the rule text and the basis of determination.
GRP-ADHESIVE	40 CFR Part 63, Subpart VVVV	63VVVV-1	Unit type = process Date constructed/placed in service = on/after compliance date - 117.540	The rule citations were determined from analysis of the rule text and the basis of determination.
GRP-GELCOAT	40 CFR Part 63, Subpart VVVV	63VVVV-1	Unit type = process Date constructed/placed in service = on/after compliance date - 117.540	The rule citations were determined from analysis of the rule text and the basis of determination.
GRP-LAMINATE	40 CFR Part 63, Subpart VVVV	63VVVV-1	Unit type = process Date constructed/placed in service = on/after compliance date - 117.540	The rule citations were determined from analysis of the rule text and the basis of determination.
GRP-MIX	40 CFR Part 63, Subpart VVVV	63VVVV-1	Unit type = process Date constructed/placed in service = on/after compliance date - 117.540	The rule citations were determined from analysis of the rule text and the basis of determination.
GRP-TANKS	30 TAC Chapter 115, Storage of VOCs	63VVVV-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = Other than crude oil, condensate, or VOC	
GRP-LOAD	30 TAC Chapter 115, Loading and Unloading of VOC	115C-1	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline. Transfer Type = Only loading. True Vapor Pressure = True vapor pressure is less than 1.5 psia. Daily Throughput = Loading less than 20,000 gallons per day.	
GRP-COAT	30 TAC Chapter 115, Surface Coating Operations	115E-1	Alternative Compliance Method = No alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria has been approved by the TCEQ Executive Director under 30 TAC § 115.423(2), § 115.423(3)(A) or § 115.423(4). Facility Operations = Other miscellaneous metal parts and products coating. VOC Emission Rate = Other uncontrolled emission rates. Vapor Recovery = No vapor recovery system is used to control emissions. Alternate Requirements = No alternate requirement to 30 TAC § 115.421(8) has been approved by the TCEQ Executive Director.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Miscellaneous Coating Type = Coating type other than low-bake coatings, coating using air or forced air dryers, extreme performance and clear coat/interior protective coating for pails and drums.	

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

\*\* - Notes changes made to the automated results from the DSS

## 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.: 23270	Issuance Date: 03/03/2023
Authorization No.: 134155	Issuance Date: 12/14/2016
<b>Permits by Rule (30 TAC Chapter 106) for the Application Area</b>	
Number: 106.102	Version No./Date: 09/04/2000
Number: 106.103	Version No./Date: 09/04/2000
Number: 106.183	Version No./Date: 09/04/2000
Number: 106.227	Version No./Date: 09/04/2000
Number: 106.231	Version No./Date: 09/04/2000
Number: 106.262	Version No./Date: 11/01/2003
Number: 106.263	Version No./Date: 11/01/2003
Number: 106.265	Version No./Date: 09/04/2000
Number: 106.266	Version No./Date: 09/04/2000
Number: 106.375	Version No./Date: 09/04/2000
Number: 106.392	Version No./Date: 09/04/2000
Number: 106.432	Version No./Date: 09/04/2000
Number: 106.433	Version No./Date: 09/04/2000
Number: 106.452	Version No./Date: 09/04/2000
Number: 106.454	Version No./Date: 11/01/2001
Number: 106.476	Version No./Date: 09/04/2000
Number: 3	Version No./Date: 09/23/1982
Number: 13	Version No./Date: 05/04/1994
Number: 39	Version No./Date: 09/23/1982
Number: 68	Version No./Date: 07/20/1992
Number: 83	Version No./Date: 09/23/1982
Number: 105	Version No./Date: 05/04/1994

#### **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 6. 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.

### 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 April 16, 2025.

Site rating: 0.00 / High Company rating: 0.00 / High

(*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