

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program
Texas Commission on Environmental Quality

All initial issuance, revision, renewal, and reopening permit application submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. Identifying Information
RN: 106155849
CN: 603315953
Account No.: HGA1450
Permit No.: O3759
Project No.: 35475
Area Name: PVA Plant
Company Name: Kuraray America, Inc.
II. Certification Type <i>(Please mark appropriate box)</i>
<input checked="" type="checkbox"/> Responsible Official Representative <input type="checkbox"/> Duly Authorized Representative
III. Submittal Type <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>
<input type="checkbox"/> SOP/TOP Initial Permit Application <input type="checkbox"/> Permit Revision, Renewal, or Reopening
<input type="checkbox"/> GOP Initial Permit Application <input checked="" type="checkbox"/> Update to Permit Application
<input type="checkbox"/> Other: _____

AIR PERMITS DIVISION

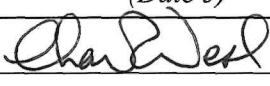
FEB 05 2025

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Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program
Texas Commission on Environmental Quality

All initial issuance, revision, and renewal permit application submittals requiring certification must be accompanied by this form. Updates to acid rain or CSAPR (other than public notice verification materials) must be certified prior to authorization of public notice for the draft permit.

IV. Certification of Truth			
This certification does not extend to information which is designated by TCEQ as information for reference only.			
I, <u>Charles Neal</u> certify that I am the <u>RO</u>			
<i>(Certifier Name printed or typed)</i>		<i>(RO or DAR)</i>	
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:			
<i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>			
Time Period: <u>8/4/2023</u> to <u>01/31/2025</u>			
<i>(Start Date)</i>		<i>(End Date)</i>	
Specific Dates: _____			
<i>(Date 1)</i>		<i>(Date 2)</i>	
<i>(Date 3)</i>		<i>(Date 4)</i>	
<i>(Date 5)</i>		<i>(Date 6)</i>	
Signature: <u></u>		Signature Date: <u>1/31/2025</u>	
Title: <u>General Manager</u>			

From: [Hervey, Carolyn](#)
To: [Vasant Chaphekar](#)
Cc: [Megan Yao](#); [Reza, Jennifer](#)
Subject: Re: [External]RE: WDP review -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant
Date: Friday, January 31, 2025 2:47:08 PM
Attachments: [image001.png](#)
[image.png](#)
[OP-CRO1 \(O3759-Project No. 35475\)\(01-31-2025\).pdf](#)

Good Afternoon Mr. Vasant!

As requested, attached is an electronic copy of the signed OP-CRO1 form reflecting the start date of 08/04/2023 and the end date of 01/31/2025. I will send mail the hardcopy of this form to you today. Please confirm this is your mailing address: *P. O. Box 13087 (MC 163), Austin, TX 78711*. Let me know if you have any questions and/or need any additional information. Thank you!

Regards,

Carolyn Hervey



HSES Environmental Air Specialist

Kuraray America Inc.

12342 Strang Road

LaPorte, Texas 77571

Office: (832) 568-8328

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From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Sent: Thursday, January 30, 2025 9:31 AM

To: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>

Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>

Subject: RE: [External]RE: WDP review -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Carolyn,

During QA/QC review, it was noted that permit shields for units T-061, T-920, and V-606 from MACT FFFF were granted incorrectly and need to be deleted. While it is true that the Group 2 wastewater streams don't get the control requirements that Group 1 does, there are still limited requirements for them (e.g., determining group status and some recordkeeping/reporting requirements). These requirements are listed in Special Term and Condition 13 in O3759 permit. Attached is revised WDP (version 01302025) which deletes the previously granted permit shields.

Please submit (via STEERS) an OP-CRO1 form signed by your RO or DAR for authorization of all information submitted by you for the time period starting 08/04/2023 (date your application was received by TCEQ) and ending 0X/XX/2025 (date your RO or DAR has signed the OP-CRO1 form). This authorization is needed to certify new info received and changes made to your application. If you do not plan to send the OP-CRO1 form via STEERS you will need to send me the original/signed version of the OP-CRO1 form by mail (preferably via overnight mail with tracking number) and send me a pdf version by email.

Let me know if you have any comments/questions.

Thanks,

Vasant

From: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>

Sent: Tuesday, January 21, 2025 2:27 PM

To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>

Subject: Re: [External]RE: WDP review -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Mr. Vasant,

This information is correct. Mr. Charles E. Neal is the RO and the site currently does not have an assigned DAR. Thank you!

Regards,

Carolyn Hervey

From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Sent: Tuesday, January 21, 2025 1:42 PM

To: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>

Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>

Subject: RE: [External]RE: WDP review -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Carolyn,

Just wanted to let you know that currently the site has Mr. Charles E Neal as the RO but there is no one assigned as a DAR for the site. Let me know if this information needs to be updated.

Thanks,

Vasant

From: Vasant Chaphekar

Sent: Tuesday, January 21, 2025 9:37 AM

To: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>

Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>

Subject: RE: [External]RE: WDP review -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Carolyn,

It is my assumption that (per Jennifer's email dated Oct 15, 2024) you -- Carolyn Hervey -- will replace Jennifer as the technical contact for this project. For documentation purpose, I would like to request that you submit revised OP-1 form (section VII on page 3 and section XI on page 5) to make change the official.

Thanks,

Vasant

From: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>

Sent: Tuesday, January 21, 2025 9:12 AM

To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>

Subject: Re: [External]RE: WDP review -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Good Morning Mr. Vasant!

Thank you for the follow up. Please revise the statement to reflect "Further information may also be obtained for Kuraray America, Inc. by calling Ms. Carolyn Hervey at (832) 568-8328." Let me know if you have any additional questions and/or need any more information. Thanks again!

Regards,

Carolyn Hervey

The logo for Kuraray, featuring the word "kuraray" in a stylized, lowercase, blue font.

HSES Environmental Air Specialist

Kuraray America Inc.

12342 Strang Road

LaPorte, Texas 77571

Office: (832) 568-8328

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From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Sent: Tuesday, January 21, 2025 9:00 AM

To: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>

Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>

Subject: RE: [External]RE: WDP review -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Good morning Carolyn,

I am preparing the public notice (PN) documentation package for FOP O3759. The public notice itself contains a statement "Further information may also be obtained for Kuraray America, Inc. by calling Ms. Jennifer Reza at (281) 549-9479". Please confirm this statement is correct/accurate or needs to be revised. That is, point of contact for the public to obtain more information about the permit/project requested by Kuraray is Ms. Jennifer Reza at (281) 549-9479.

Thanks,
Vasant

From: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>

Sent: Monday, January 6, 2025 9:25 AM

To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>

Subject: Re: [External]RE: WDP review -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Good Morning Mr. Vasant!

Thank you for the update! I will definitely contact you if I have any additional questions and/or need any further assistance.

Regards,

Carolyn Hervey

The logo for Kuraray, featuring the word "kuraray" in a stylized, lowercase, blue font.

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From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Sent: Monday, January 6, 2025 9:00 AM
To: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>
Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: RE: [External]RE: WDP review -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Good morning Carolyn,

I have noted that you do not have any additional comments on the WDP (version 12202024). I will proceed with the next steps in permit processing –

- 1) I will prepare a public notice (PN) documentation package, which includes PN letter and links to a statement of basis (SOB) and the SOP draft (WDP) documents.
- 2) This package will go through an internal review (QA/QC, team leader and TCEQ management review).
- 3) Changes may be made to the WDP during the internal review process and/or additional info may be required. If WDP is substantially changed you will have an opportunity to comment on the changes. Changes made to the WDP may require submittal of additional info (e.g., forms, etc.) via STEERS.
- 4) When advised, you will need to submit (via STEERS) an OP-CRO1 form signed by your RO or DAR for authorization of all information submitted by you for the time period starting 08/04/2023 (date your application was received by TCEQ) and ending 0X/XX/2025 (date your RO or DAR has signed the OP-CRO1 form). This authorization is needed to certify new info received and changes made to your application. Please do not send the OP-CRO1 form via STEERS until advised.

Let me know if you have any questions.

Thanks,
Vasant

From: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>
Sent: Saturday, January 4, 2025 12:20 PM
To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>

Subject: Re: [External]RE: WDP review -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hello Mr. Vasant!

Happy New Year! My apologies for the delay in sending this e-mail as requested. Per your request, Kuraray America Inc. (Kuraray) do not have any further comments regarding the WDP. Please let me know if you have any questions and/or need any additional information. Thank you!

Regards,

Carolyn Hervey



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LaPorte, Texas 77571

Office: (832) 568-8328

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From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Sent: Friday, December 20, 2024 2:39 PM

To: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>

Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>

Subject: [External]RE: WDP review -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Carolyn,

I have incorporated the suggested changes and a revised copy of the Working Draft Permit (WDP) (version 12202024) is attached for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided. Since this is a follow-up review to the previously submitted and reviewed WDP, only comments concerning changes since the last WDP may be considered by TCEQ.

Please submit a written response by Friday, January 3, 2025, even if you are not making any comments

on the content of the WDP.

Please review the second portion of the “SOP Technical Review Fact Sheet” located at http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf. This guidance contains important information regarding WDP review and comment procedures.

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified application information, including application updates supporting the WDP comments, is required. After final review of the WDP, additional changes supported by application updates may require certification. I will advise you of these changes at a later date. Also, prior to transmittal of the Public Notice related documents, a duly signed OP-CRO1 form may be required which includes the specific dates or time-period of all submitted application documentation that was not previously certified. I will advise you of sending the OP-CRO1 form prior to sending the Public Notice related documents.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1.

Please notify me when any updates have been submitted via STEERS.

As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at R6AirPermitsTX@epa.gov and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at [Where to Submit FOP Applications and Permit-Related Documents](#).

Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,
Vasant

From: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>

Sent: Thursday, December 19, 2024 12:16 PM

To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>

Subject: Re: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Mr. Vasant,

Per your e-mail received on 12/04/2024 regarding the Working Draft Permit (WDP) for Title V Permit O 3759 (Project No. 35475), the following are Kuraray America Inc.'s (Kuraray) responses to your remaining inquiry regarding the WDP:

3) Please review NSR authorization for all units (pages 102-105) and check if they are valid. Some units such as TOTES, T-918 appear to be authorized by a PBR that may need a registration (Registered PBR). If any changes are made, it may affect OP-PBRSUP table.

Kuraray's Response: Please refer to the attachment which includes an updated OP-PBRSUP and OP-SUMR for the totes. As stated within the previous response sent on 12/17/2024, T-918 previously authorized under PBR Registration No. 147158 was consolidated into

NSR 96510 during the NSR renewal and amendment in 2022. The OP-SUMR for T-918 was provided in the response on 12/17/2024 as well.

As for the periodic monitoring requirements for the scrubbers within the WDP, Kuraray has no further comments and accepts the scrubbers PM requirements as stated.

Feel free to contact me if you have any additional questions and/or need any more information. Thank you again!

Regards,
Carolyn Hervey



HSES Environmental Air Specialist
Kuraray America Inc.
12342 Strang Road
LaPorte, Texas 77571
Office: (832) 568-8328

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From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Sent: Wednesday, December 4, 2024 2:17 PM

To: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>

Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>

Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Carolyn,

Thx for your prompt response. I have conducted a technical review of your renewal application for your Title V Permit (O3759/Project 35475 Kuraray America, Inc./PVOH Plant). An electronic copy of a Working Draft Permit (WDP) is attached for your review/comments. The WDP contains TCEQ's determination of the applicable state/federal requirements based on the information submitted in your application, and any updates provided thereafter. Appreciate if you would acknowledge receipt of this email.

Please review the WDP (version 12042024) and submit any comments by COB, Thursday, 12/19/2024 or earlier. You must submit a written response by this deadline, even if you are not making any comments on the content of the WDP. *Please note that the WDP includes several changes/assumptions/requests for information which are listed below.* Along with your WDP comments please provide an itemized response to each item listed.

Please note the following:

1) The OP-PBRSUP dated 11/04/2024 is missing Table A – please submit a revised and

complete OP-PBRSUP table dated 11/04/2024 which contains all tables A through D. If a table (such as Table C) contains no units or PBRs include it with the notation "Not Applicable".

2) To facilitate data entry, tank units EPN12TK, EPN13TK, PORTTK, V-021, V-022, V-023, V-024 for which a permit shield has been requested have been grouped. Let me know if you disagree with the grouping.

3) Please review NSR authorization for all units (pages 102-105) and check if they are valid. Some units such as TOTES, T-918 appear to be authorized by a PBR that may need a registration (Registered PBR). If any changes are made, it may affect OP-PBRSUP table.

Please review the "SOP Technical Review Fact Sheet" located at

https://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf.

This guidance contains important information regarding WDP review and comment procedures.

Note that a Certification by Responsible Official (Form OP-CRO1) for any as yet uncertified submittals, including the WDP response, is required to be submitted (via STEERS or as a hard copy). I will advise you at a later date regarding the specifics of the OP-CRO1 form submittal.

Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,
Vasant

From: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>

Sent: Wednesday, December 4, 2024 11:35 AM

To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>

Subject: Re: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Good Morning Mr. Vasant!

Per your e-mail inquiry received yesterday, (12/3/2024), Kuraray America Inc. (Kuraray) provides the following responses:

1. Item 1- Please confirm if ABRASIVE unit is authorized only under NSR 96510 or only under PBR 106.454 or under both. Suggest you submit a revised OP-SUMR to document the NSR/PBR authorizations.

Kuraray's Response: ABRASIVE unit was only authorized under PBR 106.452. The facility does not have blasting activities onsite; therefore, Kuraray is requesting not to include ABRASIVE unit in the SOP and to remove PBR 106.452 from the SOP. This was reflected in the OP-REQ1 submitted on 11/5/2024. Additionally, the OP-SUMR submitted on 4/24/2024 for ABRASIVE unit needs to be removed.

2. Item 7- OP-MON (submitted as an attachment to your email dated 11/05/2024) appears to include PMG-LF-V-052 as a standard PM option which is not supported by TCEQ. Please refer to periodicmon.pdf for list of valid PM options for monitoring VOCs which is the pollutant being monitored under Ch 115.412(1) main standard. Please re-submit OP-MON form.

Kuraray's Response: The PM option is PM-V-052. Please see the attached updated OP-MON.

Please confirm your receipt of this e-mail response. Feel free to contact me if you have any additional questions and/or need more information. Thank you!

Regards,
Carolyn Hervey



HSES Environmental Air Specialist
Kuraray America Inc.
12342 Strang Road
LaPorte, Texas 77571
Office: (832) 568-8328

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From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Sent: Tuesday, December 3, 2024 9:36 AM
To: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>
Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: RE: [External]RE: Project status -- 03759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Carolyn,
Re: item 7 perhaps you intended to list PM-V-052 as the standard PM option on the OP-MON form (instead of PMG-LF-V-052). Please confirm.
Thanks,
Vasant

From: Vasant Chaphekar
Sent: Tuesday, December 3, 2024 9:31 AM
To: 'Hervey, Carolyn' <Carolyn.Hervey@kuraray.com>
Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: RE: [External]RE: Project status -- 03759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Carolyn,
Below are follow up questions (in blue) to your responses on items 1 and 7. Appreciate your response by close of business on Friday, 12/6/2024.
Thanks,
Vasant

From: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>
Sent: Tuesday, November 5, 2024 11:22 AM
To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: Re: [External]RE: Project status -- 03759/Project 35475 Kuraray America, Inc./PVOH Plant

Good Morning Mr. Vasant!

My apologies you did not receive this information yesterday. It was sent; however, I am currently traveling for work and do not have stable network connections, so there is a delay in my e-mails being sent. So, I'm resending to ensure your receipt. Thank you!

Regards,
Carolyn Hervey



HSES Environmental Air Specialist
Kuraray America Inc.
12342 Strang Road
LaPorte, Texas 77571
Office: (832) 568-8328

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Good Morning Mr. Vasant!

Per your e-mail request received on October 23rd, 2024, Kuraray America Inc. (Kuraray) provides the following responses to your inquiries:

1) ABRASIVE unit appears to have multiple/inconsistent authorizations: OP-2 Table 2, rev 1 shows it is authorized under NSR 96510, OP-SUMR Table 1 dated 4/24/24 shows authorization only under PBR 106.454, and OP-PBR SUP Table B dated 4/24/24, page 2, ABRASIVE unit is authorized under PBR 106.452 09/04/2000. Please resolve all inconsistencies and re-submit OP-SUMR and OP-PBR SUP tables.

Kuraray's Response: The facility does not have blasting activities onsite. Kuraray requests to remove PBR 106.452/09/04/2000 from O3759. Please see the updated OP-PBR SUP Table B and updated Page 88 of OP-REQ1 in the attachment.

Question: Please confirm if ABRASIVE unit is authorized only under NSR 96510 or only under PBR 106.454 or under both. Suggest you submit a revised OP-SUMR to document the NSR/PBR authorizations.

2) OP-REQ1 form, page 87, change issuance date for NSR 96510 from 7/24/2023 to 8/9/2024 (per project 362638). Please submit revised OP-REQ1 page.

Kuraray's Response: Please see the updated OP-REQ1 Page 87 in the attachment.

3) Are FUGITIVES unit listed on UA12 form different than FUGITIVES units listed in OP-PBR SUP and authorized under PBR 147877 and 172343?

Kuraray's Response: FUGITIVES on OP-UA12 is the same unit as the one listed on OP-PBR SUP. PBR 147877 authorizes the fugitive components associated with the third dryer added to the site and is incorporated into NSR 95610 by reference. PBR 172343

authorizes annual fugitive changes and will be incorporated into NSR 96510 at the next amendment or renewal.

4) Please submit an OP-SUMR form to document ALL units listed in Tables A, B and D of OP-PBRSUP that are not currently listed in the SOP renewal application (a list of units and their NSR/PBR authorization included in a draft version of the WDP is attached). For example, PLTMSS, PLTRPL, PLTREF, CTLLOADING, FOAMTK, C3111SCRUB, etc. appear to be missing from the attached Excel file. If these units have other state or federal applicable requirements, please submit applicable OP-UA forms. For units that are listed on the attached spread sheet and in the OP-PBRSUP form, e.g., FUGITIVES, EMGEN, please confirm all NSR/PBR authorizations are correctly listed.

Kuraray's Response: Please see attached OP-SUMR and OP-PBRSUP. Items 1 to 3 on OP-2 address the applicability for these units.

5) For FUGITIVES unit, OP-UA1, subject to MON requirements under MACT FFFF please make sure you have submitted the following forms (as applicable) to determine MACT FFFF requirements: UA60, UA58, UA52, UA45, UA15, UA14, UA13.

Kuraray's Response: Kuraray has submitted applicable forms OP-UA3, OP-UA4, OP-UA13, OP-UA15, and OP-UA60 with the renewal application dated Aug 4, 2023. All MACT FFFF applicability has been represented in the permit and any subsequent application submittals.

6) GRPTKG1ABS will be deleted since it has only 1 unit T-912, UA3. To restore the group, you will need to include at least 2 units.

Kuraray's Response: Kuraray agrees to remove the group ID GRPTKG1ABS from the permit.

7) Periodic Monitoring (PM) is required for DEGREASE unit subject to 30 TAC Ch 115. Please submit OP-MON form to demonstrate compliance with Ch 115.412(1) main standard.

Kuraray's Response: Kuraray is submitting the updated OP-UA16 and OP-MON in the attachment.

Question: OP-MON (submitted as an attachment to your email dated 11/05/2024) appears to include PMG-LF-V-052 as a standard PM option which is not supported by TCEQ. Please refer to [periodicmon.pdf](#) for list of valid PM options for monitoring VOCs which is the pollutant being monitored under Ch 115.412(1) main standard. Please re-submit OP-MON form.

8) FL-051 unit, UA7, pages 5 and 6, HRVOC Vent Gas, NO codes for alternative monitoring approach and Modifications to Testing/Monitoring are interpreted as OTHER, NONE code respectively. Please confirm.

Kuraray's Response: Please see attached OP-UA7 – Updated Page 5.

Please confirm your receipt of this e-mail response. Feel free to contact me if you have any additional questions and/or need more information. Thank you!

Regards,
Carolyn Hervey

kuraray

HSES Environmental Air Specialist
Kuraray America Inc.
12342 Strang Road
LaPorte, Texas 77571
Office: (832) 568-8328

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From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Sent: Wednesday, October 23, 2024 3:35 PM

To: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>

Cc: Megan Yao <myao@spiritehv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>

Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Carolyn,

I have conducted a technical review of your renewal application for your Title V Permit (O3759/Project 35475 Kuraray America, Inc./PVOH Plant). Please provide the following information required to generate a working draft of the permit (WDP):

- 1) ABRASIVE unit appears to have multiple/inconsistent authorizations: OP-2 Table 2, rev 1 shows it is authorized under NSR 96510, OP-SUMR Table 1 dated 4/24/24 shows authorization only under PBR 106.454, and OP-PBRSUP Table B dated 4/24/24, page 2, ABRASIVE unit is authorized under PBR 106.452 09/04/2000. Please resolve all inconsistencies and re-submit OP-SUMR and OP-PBRSUP tables.
- 2) OP-REQ1 form, page 87, change issuance date for NSR 96510 from 7/24/2023 to 8/9/2024 (per project 362638). Please submit revised OP-REQ1 page.
- 3) Are FUGITIVES unit listed on UA12 form different than FUGITIVES units listed in OP-PBRSUP and authorized under PBR 147877 and 172343?
- 4) Please submit an OP-SUMR form to document ALL units listed in Tables A, B and D of OP-PBRSUP that are not currently listed in the SOP renewal application (a list of units and their NSR/PBR authorization included in a draft version of the WDP is attached). For example, PLTMSS, PLTRPL, PLTREF, CTLLOADING, FOAMTK, C3111SCRUB, etc. appear to be missing from the attached Excel file. If these units have other state or federal applicable requirements, please submit applicable OP-UA forms. For units that are listed on the attached spread sheet and in the OP-PBRSUP form, e.g., FUGITIVES, EMGEN, please confirm all NSR/PBR authorizations are correctly listed.
- 5) For FUGITIVES unit, OP-UA1, subject to MON requirements under MACT FFFF please make sure you have submitted the following forms (as applicable) to determine MACT FFFF requirements: UA60, UA58, UA52, UA45, UA15, UA14, UA13,
- 6) GRPTKG TABS will be deleted since it has only 1 unit T-912, UA3. To restore the group, you will need to include at least 2 units.
- 7) Periodic Monitoring (PM) is required for DEGREASE unit subject to 30 TAC Ch 115. Please submit OP-MON form to demonstrate compliance with Ch 115.412(1) main standard.
- 8) FL-051 unit, UA7, pages 5 and 6, HRVOC Vent Gas, NO codes for alternative monitoring approach and Modifications to Testing/Monitoring are interpreted as OTHER, NONE code respectively. Please confirm.

Contact me if you have any questions. Appreciate your itemized response by Monday,

November 4, 2024, or earlier.

Thank you for your cooperation.

Sincerely,
Vasant

From: Reza, Jennifer <Jennifer.Reza@kuraray.com>
Sent: Tuesday, October 15, 2024 3:08 PM
To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Cc: Megan Yao <myao@spiritenv.com>; Hervey, Carolyn <Carolyn.Hervey@kuraray.com>
Subject: Re: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Vasant,

The records that I thought I owed you had actually already been submitted. I see that Megan has already reached out to you for an update so we will wait to hear back from you as to what information you still need.

Additionally, Carolyn Hervey will be the primary contact for Kuraray moving forward. I am including her on this email.

Thank you,

Jenn Reza

Office: 281-549-9479
Mobile: 281-786-7155

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From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Sent: Tuesday, October 15, 2024 2:57 PM
To: Reza, Jennifer <Jennifer.Reza@kuraray.com>
Cc: Megan Yao <myao@spiritenv.com>
Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Jenn,

Thx for your email. Re: submittal of records – I have noted that you are planning to submit them soon. No problem. As mentioned in my email, if we need to talk, we should do so via a Teams call/meeting.
Vasant

From: Reza, Jennifer <Jennifer.Reza@kuraray.com>
Sent: Tuesday, October 15, 2024 2:51 PM
To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Cc: Megan Yao <myao@spiritenv.com>
Subject: Re: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Vasant,

I was the one calling. I wanted to touch base with you. I have moved out of our environmental department and am realizing that I forgot to follow up on this project. I believe that you are still waiting on submittal of some records. I think at the time my attention was split between several things and I thought the submittal was in the FTPS not STEERS. I am working with the DAR to get the documents officially submitted right now.

I appreciate your patience.

Thank you,

Jenn Reza

Office: 281-549-9479
Mobile: 281-786-7155

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From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Sent: Tuesday, October 15, 2024 2:46 PM
To: Megan Yao <myao@spiritenv.com>
Cc: Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Megan,
I got a call from Kuraray (Ph 281-786-7155) a few minutes ago but I could not connect with the caller. Do you know who may be calling? It would be best to talk via a Teams call.
Thanks,
Vasant

From: Megan Yao <myao@spiritenv.com>
Sent: Tuesday, October 8, 2024 2:03 PM
To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Mr. Chaphekar,

Thank you for your response!

Megan Yao

Associate Project Manager

DIRECT 281-664-2837 | **MOBILE** 832-603-7982

myao@spiritenv.com



From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Sent: Tuesday, October 8, 2024 1:20 PM

To: Megan Yao <myao@spiritenv.com>

Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Megan,

Thx for your email. Project status – working on resolving errors in the application to generate a working draft permit (WDP). As an example, FL-051 unit, UA7, pages 5 and 6, HRVOC Vent Gas, NO codes for alternative monitoring approach and Modifications to Testing/Monitoring appear to be invalid. Next step - I will send you a complete list of missing (or incorrect) codes, or other info required to generate the WDP.

Vasant

From: Megan Yao <myao@spiritenv.com>

Sent: Tuesday, October 8, 2024 10:50 AM

To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Good morning Mr. Chaphekar,

Could you please give us an update on the status of O3759 renewal (Project No. 35475)? Thank you,

Megan Yao

Associate Project Manager

DIRECT 281-664-2837 | **MOBILE** 832-603-7982

myao@spiritenv.com



From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Sent: Thursday, April 25, 2024 10:54 AM

To: Megan Yao <myao@spiritenv.com>

Cc: Reza, Jennifer <Jennifer.Reza@kuraray.com>; Robert Osborn <rosborn@spiritenv.com>

Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Rec'd. Thx.

From: Megan Yao <myao@spiritenv.com>
Sent: Wednesday, April 24, 2024 8:21 PM
To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Cc: Reza, Jennifer <Jennifer.Reza@kuraray.com>; Robert Osborn <rosborn@spiritenv.com>
Subject: RE: [External]RE: Project status -- 03759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Mr. Chaphekar, Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Please see the responses in bold embedded in the email below and the updated forms. Thank you,
Megan

From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Sent: Thursday, April 18, 2024 11:19 AM
To: Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: [External]RE: Project status -- 03759/Project 35475 Kuraray America, Inc./PVOH Plant

Correction

PBR's 106.433, 106.452 are listed in *current permit* but not in OP-PBRSUP. Please revise applicable forms to maintain consistency.

From: Vasant Chaphekar
Sent: Thursday, April 18, 2024 11:18 AM
To: 'Jennifer.reza@kuraray.com' <Jennifer.reza@kuraray.com>
Subject: Project status -- 03759/Project 35475 Kuraray America, Inc./PVOH Plant

Good morning Ms. Reza,

Above referenced project has been reassigned to me. Going forward, I will be processing your application for renewal of your Title V permit (03759/Project 35475 Kuraray America, Inc./PVOH Plant). Please address all correspondence pertaining to this permit application, including e-mails and updates, to me at the address below, and use the Permit Project reference numbers shown above in the subject line to facilitate tracking. Recommend that all parties on this distribution list use (reply to) the same 'thread' of e-mail rather than create a new one so that at the end of the project we have a complete documentation of all project related e-mails. Any project related email communication sent to me without the subject header "03759/Project 35475 Kuraray America, Inc./PVOH Plant" may result in delays.

To facilitate timely communication, I would appreciate if you would acknowledge receipt of all e-mail's, especially if any action is required. If additional or missing information is required, you will typically be requested to submit it by a 'due date' (that is determined by me based on the amount and complexity of info requested, time allocated to complete this project, and my project loading). If you have any questions or concerns regarding the due date, please contact me asap.

As an initial request, please submit the following info as soon as practical:

1. In OP-REQ1, NSR permit 95610 issuance date is shown as 09/17/2012 which appears to be

incorrect. Should be 09/15/2022?

Kuraray's response: Please see attached updated OP-REQ1 Page 87 with the updated issuance date for NSR 96510. The NSR renewal and amendment application was completed 7/24/2023 (Project #347692).

2. Current FOP includes a compliance schedule. Please confirm this schedule is no longer required based on OP-ACPS form. Correct?

Kuraray's response: The current Title V permit is effective June 2022 and does not contain a compliance schedule. These schedules were removed during the 2022 significant revision (Project # 32814).

3. PBR's 106.433, 106.452 are listed in OP-REQ1 but not in OP-PBRSUP. Please revise applicable forms to maintain consistency.

Kuraray's response: Kuraray requests to remove PBR 106.433 from the permit because the site does not have a surface coating facility. Please see attached updated OP-REQ1 Page 88, updated OP-PBRSUP, and OP-SUMR associated with PBR 106.452.

Please be advised that all federal operating permit (Title V) correspondence from TCEQ, including final actions, for this project will be sent via e-mail.

If you have any questions or concerns on any of these items or think you need to do any additional updates, let me know and we can discuss further.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1. This form will be requested at a later date.

If you choose to submit your application updates through STEERS, please notify me when these updates have been submitted.

I plan to conduct an in-depth technical review of your application and may contact you again to request additional information. Please contact me if you have any questions regarding the project schedule, or any other details regarding your application or permit. I look forward to working with you on this project.

Sincerely,

Vasant Chaphekar, P.E.

Technical Specialist, Air Permits Division
Texas Commission on Environmental Quality
P.O. Box 13087, MC 163
Austin, TX 78711
Ph: (512) 239-1341
Fax: (512) 239-1400
Vasant.Chaphekar@tceq.texas.gov
[Take our customer satisfaction survey at www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

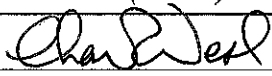
Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program
Texas Commission on Environmental Quality

All initial issuance, revision, renewal, and reopening permit application submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. Identifying Information	
RN: 106155849	
CN: 603315953	
Account No.: HGA1450	
Permit No.: O3759	
Project No.: 35475	
Area Name: PVA Plant	
Company Name: Kuraray America, Inc.	
II. Certification Type <i>(Please mark appropriate box)</i>	
<input type="checkbox"/> Responsible Official Representative	<input checked="" type="checkbox"/> Duly Authorized Representative
III. Submittal Type <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>	
<input type="checkbox"/> SOP/TOP Initial Permit Application	<input type="checkbox"/> Permit Revision, Renewal, or Reopening
<input type="checkbox"/> GOP Initial Permit Application	<input checked="" type="checkbox"/> Update to Permit Application
<input type="checkbox"/> Other: _____	

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program
Texas Commission on Environmental Quality

All initial issuance, revision, and renewal permit application submittals requiring certification must be accompanied by this form. Updates to acid rain or CSAPR (other than public notice verification materials) must be certified prior to authorization of public notice for the draft permit.

IV. Certification of Truth			
This certification does not extend to information which is designated by TCEQ as information for reference only.			
I, <u>Charles Neal</u> certify that I am the <u>RO</u>			
<i>(Certifier Name printed or typed)</i>		<i>(RO or DAR)</i>	
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:			
<i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>			
Time Period: <u>8/4/2023</u> to <u>01/31/2025</u>			
<i>(Start Date)</i>		<i>(End Date)</i>	
Specific Dates: _____			
<i>(Date 1)</i>		<i>(Date 2)</i>	
<i>(Date 3)</i>		<i>(Date 4)</i>	
<i>(Date 5)</i>		<i>(Date 6)</i>	
Signature: <u></u>		Signature Date: <u>1/31/2025</u>	
Title: <u>General Manager</u>			

From: [Hervey, Carolyn](#)
To: [Vasant Chaphekar](#)
Cc: [Megan Yao](#); [Reza, Jennifer](#)
Subject: Re: [External]RE: WDP review -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant
Date: Monday, January 6, 2025 9:24:50 AM
Attachments: [image001.png](#)
[image.png](#)

Good Morning Mr. Vasant!

Thank you for the update! I will definitely contact you if I have any additional questions and/or need any further assistance.

Regards,

Carolyn Hervey



HSES Environmental Air Specialist

Kuraray America Inc.

12342 Strang Road

LaPorte, Texas 77571

Office: (832) 568-8328

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From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Sent: Monday, January 6, 2025 9:00 AM
To: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>
Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: RE: [External]RE: WDP review -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Good morning Carolyn,

I have noted that you do not have any additional comments on the WDP (version 12202024). I will proceed with the next steps in permit processing –

- 1) I will prepare a public notice (PN) documentation package, which includes PN letter and links to a statement of basis (SOB) and the SOP draft (WDP) documents.
- 2) This package will go through an internal review (QA/QC, team leader and TCEQ management review).
- 3) Changes may be made to the WDP during the internal review process and/or additional info may be required. If WDP is substantially changed you will have an opportunity to comment on the changes. Changes made to the WDP may require submittal of additional info (e.g., forms, etc.) via STEERS.
- 4) When advised, you will need to submit (via STEERS) an OP-CRO1 form signed by your RO or DAR for authorization of all information submitted by you for the time period starting 08/04/2023 (date your application was received by TCEQ) and ending 0X/XX/2025 (date your RO or DAR has signed the OP-CRO1 form). This authorization is needed to certify new info received and changes made to your application. Please do not send the OP-CRO1 form via STEERS until advised.

Let me know if you have any questions.

Thanks,
Vasant

From: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>
Sent: Saturday, January 4, 2025 12:20 PM
To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: Re: [External]RE: WDP review -- 03759/Project 35475 Kuraray America, Inc./PVOH Plant

Hello Mr. Vasant!

Happy New Year! My apologies for the delay in sending this e-mail as requested. Per your request, Kuraray America Inc. (Kuraray) do not have any further comments regarding the WDP. Please let me know if you have any questions and/or need any additional information. Thank you!

Regards,

Carolyn Hervey

The logo for Kuraray, featuring the word "kuraray" in a stylized, lowercase, blue font.

HSES Environmental Air Specialist

Kuraray America Inc.

12342 Strang Road

LaPorte, Texas 77571

Office: (832) 568-8328

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From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Sent: Friday, December 20, 2024 2:39 PM

To: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>

Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>

Subject: [External]RE: WDP review -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Carolyn,

I have incorporated the suggested changes and a revised copy of the Working Draft Permit (WDP) (version 12202024) is attached for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided. Since this is a follow-up review to the previously submitted and reviewed WDP, only comments concerning changes since the last WDP may be considered by TCEQ.

Please submit a written response by Friday, January 3, 2025, even if you are not making any comments on the content of the WDP.

Please review the second portion of the "SOP Technical Review Fact Sheet" located at http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf. This guidance contains important information regarding WDP review and comment procedures.

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified application information, including application updates supporting the WDP comments, is required. After final review of the WDP, additional changes supported by application updates may require certification. I will advise you of these changes at a later date. Also, prior to transmittal of the Public Notice related documents, a duly signed OP-CRO1 form may be required which includes the specific dates or time-period of all submitted application documentation that was not previously certified. I will advise you of sending the OP-CRO1 form prior to sending the Public Notice related documents.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1.

Please notify me when any updates have been submitted via STEERS.

As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at R6AirPermitsTX@epa.gov and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at [Where to Submit FOP Applications and Permit-Related Documents](#).

Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,
Vasant

From: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>
Sent: Thursday, December 19, 2024 12:16 PM
To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: Re: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Mr. Vasant,

Per your e-mail received on 12/04/2024 regarding the Working Draft Permit (WDP) for Title V Permit O 3759 (Project No. 35475), the following are Kuraray America Inc.'s (Kuraray) responses to your remaining inquiry regarding the WDP:

3) Please review NSR authorization for all units (pages 102-105) and check if they are valid. Some units such as TOTES, T-918 appear to be authorized by a PBR that may need a registration (Registered PBR). If any changes are made, it may affect OP-PBRSUP table.

Kuraray's Response: Please refer to the attachment which includes an updated OP-PBRSUP and OP-SUMR for the totes. As stated within the previous response sent on 12/17/2024, T-918 previously authorized under PBR Registration No. 147158 was consolidated into NSR 96510 during the NSR renewal and amendment in 2022. The OP-SUMR for T-918 was provided in the response on 12/17/2024 as well.

As for the periodic monitoring requirements for the scrubbers within the WDP, Kuraray has no further comments and accepts the scrubbers PM requirements as stated.

Feel free to contact me if you have any additional questions and/or need any more information. Thank you again!

Regards,
Carolyn Hervey

kuraray

HSES Environmental Air Specialist
Kuraray America Inc.

12342 Strang Road
LaPorte, Texas 77571
Office: (832) 568-8328

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From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Sent: Wednesday, December 4, 2024 2:17 PM
To: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>
Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Carolyn,

Thx for your prompt response. I have conducted a technical review of your renewal application for your Title V Permit (O3759/Project 35475 Kuraray America, Inc./PVOH Plant). An electronic copy of a Working Draft Permit (WDP) is attached for your review/comments. The WDP contains TCEQ's determination of the applicable state/federal requirements based on the information submitted in your application, and any updates provided thereafter. Appreciate if you would acknowledge receipt of this email.

Please review the WDP (version 12042024) and submit any comments by COB, Thursday, 12/19/2024 or earlier. You must submit a written response by this deadline, even if you are not making any comments on the content of the WDP. *Please note that the WDP includes several changes/assumptions/requests for information which are listed below.* Along with your WDP comments please provide an itemized response to each item listed.

Please note the following:

- 1) The OP-PBR SUP dated 11/04/2024 is missing Table A – please submit a revised and complete OP-PBR SUP table dated 11/04/2024 which contains all tables A through D. If a table (such as Table C) contains no units or PBRs include it with the notation “Not Applicable”.
- 2) To facilitate data entry, tank units EPN12TK, EPN13TK, PORTTK, V-021, V-022, V-023, V-024 for which a permit shield has been requested have been grouped. Let me know if you disagree with the grouping.
- 3) Please review NSR authorization for all units (pages 102-105) and check if they are valid. Some units such as TOTES, T-918 appear to be authorized by a PBR that may need a registration (Registered PBR). If any changes are made, it may affect OP-PBR SUP table.

Please review the "SOP Technical Review Fact Sheet" located at https://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf. This guidance contains important information regarding WDP review and comment procedures. Note that a Certification by Responsible Official (Form OP-CRO1) for any as yet uncertified submittals, including the WDP response, is required to be submitted (via STEERS or as a hard

copy). I will advise you at a later date regarding the specifics of the OP-CRO1 form submittal. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,
Vasant

From: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>
Sent: Wednesday, December 4, 2024 11:35 AM
To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: Re: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Good Morning Mr. Vasant!

Per your e-mail inquiry received yesterday, (12/3/2024), Kuraray America Inc. (Kuraray) provides the following responses:

1. Item 1- Please confirm if ABRASIVE unit is authorized only under NSR 96510 or only under PBR 106.454 or under both. Suggest you submit a revised OP-SUMR to document the NSR/PBR authorizations.
Kuraray's Response: ABRASIVE unit was only authorized under PBR 106.452. The facility does not have blasting activities onsite; therefore, Kuraray is requesting not to include ABRASIVE unit in the SOP and to remove PBR 106.452 from the SOP. This was reflected in the OP-REQ1 submitted on 11/5/2024. Additionally, the OP-SUMR submitted on 4/24/2024 for ABRASIVE unit needs to be removed.
2. Item 7- OP-MON (submitted as an attachment to your email dated 11/05/2024) appears to include PMG-LF-V-052 as a standard PM option which is not supported by TCEQ. Please refer to periodicmon.pdf for list of valid PM options for monitoring VOCs which is the pollutant being monitored under Ch 115.412(1) main standard. Please re-submit OP-MON form.
Kuraray's Response: The PM option is PM-V-052. Please see the attached updated OP-MON.

Please confirm your receipt of this e-mail response. Feel free to contact me if you have any additional questions and/or need more information. Thank you!

Regards,
Carolyn Hervey



HSES Environmental Air Specialist
Kuraray America Inc.
12342 Strang Road
LaPorte, Texas 77571
Office: (832) 568-8328

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From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Sent: Tuesday, December 3, 2024 9:36 AM
To: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>
Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Carolyn,
Re: item 7 perhaps you intended to list PM-V-052 as the standard PM option on the OP-MON form (instead of PMG-LF-V-052). Please confirm.
Thanks,
Vasant

From: Vasant Chaphekar
Sent: Tuesday, December 3, 2024 9:31 AM
To: 'Hervey, Carolyn' <Carolyn.Hervey@kuraray.com>
Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Carolyn,
Below are follow up questions (in blue) to your responses on items 1 and 7. Appreciate your response by close of business on Friday, 12/6/2024.
Thanks,
Vasant

From: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>
Sent: Tuesday, November 5, 2024 11:22 AM
To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: Re: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Good Morning Mr. Vasant!

My apologies you did not receive this information yesterday. It was sent; however, I am currently traveling for work and do not have stable network connections, so there is a delay in my e-mails being sent. So, I'm resending to ensure your receipt. Thank you!

Regards,
Carolyn Hervey

HSES Environmental Air Specialist
Kuraray America Inc.
12342 Strang Road
LaPorte, Texas 77571
Office: (832) 568-8328

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Good Morning Mr. Vasant!

Per your e-mail request received on October 23rd, 2024, Kuraray America Inc. (Kuraray) provides the following responses to your inquiries:

1) ABRASIVE unit appears to have multiple/inconsistent authorizations: OP-2 Table 2, rev 1 shows it is authorized under NSR 96510, OP-SUMR Table 1 dated 4/24/24 shows authorization only under PBR 106.454, and OP-PBRSUP Table B dated 4/24/24, page 2, ABRASIVE unit is authorized under PBR 106.452 09/04/2000. Please resolve all inconsistencies and re-submit OP-SUMR and OP-PBRSUP tables.

Kuraray's Response: The facility does not have blasting activities onsite. Kuraray requests to remove PBR 106.452/09/04/2000 from O3759. Please see the updated OP-PBRSUP Table B and updated Page 88 of OP-REQ1 in the attachment.

Question: Please confirm if ABRASIVE unit is authorized only under NSR 96510 or only under PBR 106.454 or under both. Suggest you submit a revised OP-SUMR to document the NSR/PBR authorizations.

2) OP-REQ1 form, page 87, change issuance date for NSR 96510 from 7/24/2023 to 8/9/2024 (per project 362638). Please submit revised OP-REQ1 page.

Kuraray's Response: Please see the updated OP-REQ1 Page 87 in the attachment.

3) Are FUGITIVES unit listed on UA12 form different than FUGITIVES units listed in OP-PBRSUP and authorized under PBR 147877 and 172343?

Kuraray's Response: FUGITIVES on OP-UA12 is the same unit as the one listed on OP-PBRSUP. PBR 147877 authorizes the fugitive components associated with the third dryer added to the site and is incorporated into NSR 95610 by reference. PBR 172343 authorizes annual fugitive changes and will be incorporated into NSR 96510 at the next amendment or renewal.

4) Please submit an OP-SUMR form to document ALL units listed in Tables A, B and D of OP-PBRSUP that are not currently listed in the SOP renewal application (a list of units and their NSR/PBR authorization included in a draft version of the WDP is attached). For example, PLTMSS, PLTRPL, PLTREF, CTLLOADING, FOAMTK, C3111SCRUB, etc. appear to be missing from the attached Excel file. If these units have other state or federal applicable requirements, please submit applicable OP-UA forms. For units that are listed on the attached spread sheet and in the OP-PBRSUP form, e.g., FUGITIVES, EMGEN, please confirm all NSR/PBR authorizations are correctly listed.

Kuraray's Response: Please see attached OP-SUMR and OP-PBRSUP. Items 1 to 3 on OP-2 address the applicability for these units.

5) For FUGITIVES unit, OP-UA1, subject to MON requirements under MACT FFFF please

make sure you have submitted the following forms (as applicable) to determine MACT FFFF requirements: UA60, UA58, UA52, UA45, UA15, UA14, UA13.

Kuraray's Response: Kuraray has submitted applicable forms OP-UA3, OP-UA4, OP-UA13, OP-UA15, and OP-UA60 with the renewal application dated Aug 4, 2023. All MACT FFFF applicability has been represented in the permit and any subsequent application submittals.

6) GRPTKGTABS will be deleted since it has only 1 unit T-912, UA3. To restore the group, you will need to include at least 2 units.

Kuraray's Response: Kuraray agrees to remove the group ID GRPTKGTABS from the permit.

7) Periodic Monitoring (PM) is required for DEGREASE unit subject to 30 TAC Ch 115. Please submit OP-MON form to demonstrate compliance with Ch 115.412(1) main standard.

Kuraray's Response: Kuraray is submitting the updated OP-UA16 and OP-MON in the attachment.

Question: OP-MON (submitted as an attachment to your email dated 11/05/2024) appears to include PMG-LF-V-052 as a standard PM option which is not supported by TCEQ. Please refer to [periodicmon.pdf](#) for list of valid PM options for monitoring VOCs which is the pollutant being monitored under Ch 115.412(1) main standard. Please re-submit OP-MON form.

8) FL-051 unit, UA7, pages 5 and 6, HRVOC Vent Gas, NO codes for alternative monitoring approach and Modifications to Testing/Monitoring are interpreted as OTHER, NONE code respectively. Please confirm.

Kuraray's Response: Please see attached OP-UA7 – Updated Page 5.

Please confirm your receipt of this e-mail response. Feel free to contact me if you have any additional questions and/or need more information. Thank you!

Regards,
Carolyn Hervey

kuraray

HSES Environmental Air Specialist
Kuraray America Inc.
12342 Strang Road
LaPorte, Texas 77571
Office: (832) 568-8328

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From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Sent: Wednesday, October 23, 2024 3:35 PM

To: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>

Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>

Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Carolyn,

I have conducted a technical review of your renewal application for your Title V Permit (O3759/Project 35475 Kuraray America, Inc./PVOH Plant). Please provide the following information required to generate a working draft of the permit (WDP):

- 1) ABRASIVE unit appears to have multiple/inconsistent authorizations: OP-2 Table 2, rev 1 shows it is authorized under NSR 96510, OP-SUMR Table 1 dated 4/24/24 shows authorization only under PBR 106.454, and OP-PBRSUP Table B dated 4/24/24, page 2, ABRASIVE unit is authorized under PBR 106.452 09/04/2000. Please resolve all inconsistencies and re-submit OP-SUMR and OP-PBRSUP tables.
- 2) OP-REQ1 form, page 87, change issuance date for NSR 96510 from 7/24/2023 to 8/9/2024 (per project 362638). Please submit revised OP-REQ1 page.
- 3) Are FUGITIVES unit listed on UA12 form different than FUGITIVES units listed in OP-PBRSUP and authorized under PBR 147877 and 172343?
- 4) Please submit an OP-SUMR form to document ALL units listed in Tables A, B and D of OP-PBRSUP that are not currently listed in the SOP renewal application (a list of units and their NSR/PBR authorization included in a draft version of the WDP is attached). For example, PLTMSS, PLTRPL, PLTREF, CTLLOADING, FOAMTK, C3111SCRUB, etc. appear to be missing from the attached Excel file. If these units have other state or federal applicable requirements, please submit applicable OP-UA forms. For units that are listed on the attached spread sheet and in the OP-PBRSUP form, e.g., FUGITIVES, EMGEN, please confirm all NSR/PBR authorizations are correctly listed.
- 5) For FUGITIVES unit, OP-UA1, subject to MON requirements under MACT FFFF please make sure you have submitted the following forms (as applicable) to determine MACT FFFF requirements: UA60, UA58, UA52, UA45, UA15, UA14, UA13,
- 6) GRPTKG TABS will be deleted since it has only 1 unit T-912, UA3. To restore the group, you will need to include at least 2 units.
- 7) Periodic Monitoring (PM) is required for DEGREASE unit subject to 30 TAC Ch 115. Please submit OP-MON form to demonstrate compliance with Ch 115.412(1) main standard.
- 8) FL-051 unit, UA7, pages 5 and 6, HRVOC Vent Gas, NO codes for alternative monitoring approach and Modifications to Testing/Monitoring are interpreted as OTHER, NONE code respectively. Please confirm.

Contact me if you have any questions. Appreciate your itemized response by Monday, November 4, 2024, or earlier.

Thank you for your cooperation.

Sincerely,
Vasant

From: Reza, Jennifer <Jennifer.Reza@kuraray.com>

Sent: Tuesday, October 15, 2024 3:08 PM

To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Cc: Megan Yao <myao@spiritenv.com>; Hervey, Carolyn <Carolyn.Hervey@kuraray.com>

Subject: Re: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Vasant,

The records that I thought I owed you had actually already been submitted. I see that Megan has already reached out to you for an update so we will wait to hear back from you as to what information you still need.

Additionally, Carolyn Hervey will be the primary contact for Kuraray moving forward. I am including her on this email.

Thank you,

Jenn Reza

Office: 281-549-9479

Mobile: 281-786-7155

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From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Sent: Tuesday, October 15, 2024 2:57 PM

To: Reza, Jennifer <Jennifer.Reza@kuraray.com>

Cc: Megan Yao <myao@spiritenv.com>

Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Jenn,

Thx for your email. Re: submittal of records – I have noted that you are planning to submit them soon. No problem. As mentioned in my email, if we need to talk, we should do so via a Teams call/meeting.
Vasant

From: Reza, Jennifer <Jennifer.Reza@kuraray.com>

Sent: Tuesday, October 15, 2024 2:51 PM

To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Cc: Megan Yao <myao@spiritenv.com>

Subject: Re: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Vasant,

I was the one calling. I wanted to touch base with you. I have moved out of our environmental department and am realizing that I forgot to follow up on this project. I believe that you are still waiting on submittal of some records. I think at the time my attention was split between several things and I thought the submittal was in the FTPS not STEERS. I am working with the DAR to get the documents officially submitted right now.

I appreciate your patience.

Thank you,

Jenn Reza

Office: 281-549-9479

Mobile: 281-786-7155

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From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Sent: Tuesday, October 15, 2024 2:46 PM

To: Megan Yao <myao@spiritenv.com>

Cc: Reza, Jennifer <Jennifer.Reza@kuraray.com>

Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Megan,

I got a call from Kuraray (Ph 281-786-7155) a few minutes ago but I could not connect with the caller. Do you know who may be calling? It would be best to talk via a Teams call.

Thanks,

Vasant

From: Megan Yao <myao@spiritenv.com>

Sent: Tuesday, October 8, 2024 2:03 PM

To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Mr. Chaphekar,

Thank you for your response!

Megan Yao

Associate Project Manager

DIRECT 281-664-2837 | **MOBILE** 832-603-7982

myao@spiritenv.com



From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Sent: Tuesday, October 8, 2024 1:20 PM

To: Megan Yao <myao@spiritenv.com>

Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Megan,

Thx for your email. Project status – working on resolving errors in the application to generate a working draft permit (WDP). As an example, FL-051 unit, UA7, pages 5 and 6, HRVOC Vent Gas, NO codes for alternative monitoring approach and Modifications to Testing/Monitoring appear to be invalid. Next step - I will send you a complete list of missing (or incorrect) codes, or other info required to generate the WDP.

Vasant

From: Megan Yao <myao@spiritenv.com>

Sent: Tuesday, October 8, 2024 10:50 AM

To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Good morning Mr. Chaphekar,

Could you please give us an update on the status of O3759 renewal (Project No. 35475)? Thank you,

Megan Yao

Associate Project Manager

DIRECT 281-664-2837 | **MOBILE** 832-603-7982

myao@spiritenv.com



From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Sent: Thursday, April 25, 2024 10:54 AM

To: Megan Yao <myao@spiritenv.com>

Cc: Reza, Jennifer <Jennifer.Reza@kuraray.com>; Robert Osborn <rosborn@spiritenv.com>

Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Rec'd. Thx.

From: Megan Yao <myao@spiritenv.com>

Sent: Wednesday, April 24, 2024 8:21 PM

To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Cc: Reza, Jennifer <Jennifer.Reza@kuraray.com>; Robert Osborn <rosborn@spiritenv.com>

Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Mr. Chaphekar, Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Please see the responses in bold embedded in the email below and the updated forms. Thank you,
Megan

From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Sent: Thursday, April 18, 2024 11:19 AM

To: Reza, Jennifer <Jennifer.Reza@kuraray.com>

Subject: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Correction

PBR's 106.433, 106.452 are listed in *current permit* but not in OP-PBRSUP. Please revise applicable forms to maintain consistency.

From: Vasant Chaphekar

Sent: Thursday, April 18, 2024 11:18 AM

To: 'Jennifer.reza@kuraray.com' <Jennifer.reza@kuraray.com>

Subject: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Good morning Ms. Reza,

Above referenced project has been reassigned to me. Going forward, I will be processing your application for renewal of your Title V permit (O3759/Project 35475 Kuraray America, Inc./PVOH Plant). Please address all correspondence pertaining to this permit application, including e-mails and updates, to me at the address below, and use the Permit Project reference numbers shown above in the subject line to facilitate tracking. Recommend that all parties on this distribution list use (reply to) the same 'thread' of e-mail rather than create a new one so that at the end of the project we have a complete documentation of all project related e-mails. Any project related email communication sent to me without the subject header "O3759/Project 35475 Kuraray America, Inc./PVOH Plant" may result in delays.

To facilitate timely communication, I would appreciate if you would acknowledge receipt of all e-mail's, especially if any action is required. If additional or missing information is required, you will typically be requested to submit it by a 'due date' (that is determined by me based on the amount and complexity of info requested, time allocated to complete this project, and my project loading). If you have any questions or concerns regarding the due date, please contact me asap.

As an initial request, please submit the following info as soon as practical:

1. In OP-REQ1, NSR permit 95610 issuance date is shown as 09/17/2012 which appears to be incorrect. Should be 09/15/2022?

Kuraray's response: Please see attached updated OP-REQ1 Page 87 with the updated issuance date for NSR 96510. The NSR renewal and amendment application was completed 7/24/2023 (Project #347692).

2. Current FOP includes a compliance schedule. Please confirm this schedule is no longer required based on OP-ACPS form. Correct?

Kuraray's response: The current Title V permit is effective June 2022 and does not contain a compliance schedule. These schedules were removed during the 2022 significant revision (Project # 32814).

3. PBR's 106.433, 106.452 are listed in OP-REQ1 but not in OP-PBRSUP. Please revise applicable

forms to maintain consistency.

Kuraray's response: Kuraray requests to remove PBR 106.433 from the permit because the site does not have a surface coating facility. Please see attached updated OP-REQ1 Page 88, updated OP-PBRSUP, and OP-SUMR associated with PBR 106.452.

Please be advised that all federal operating permit (Title V) correspondence from TCEQ, including final actions, for this project will be sent via e-mail.

If you have any questions or concerns on any of these items or think you need to do any additional updates, let me know and we can discuss further.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1. This form will be requested at a later date.

If you choose to submit your application updates through STEERS, please notify me when these updates have been submitted.

I plan to conduct an in-depth technical review of your application and may contact you again to request additional information. Please contact me if you have any questions regarding the project schedule, or any other details regarding your application or permit. I look forward to working with you on this project.

Sincerely,

Vasant Chaphekar, P.E.

Technical Specialist, Air Permits Division
Texas Commission on Environmental Quality
P.O. Box 13087, MC 163
Austin, TX 78711
Ph: (512) 239-1341
Fax: (512) 239-1400

Vasant.Chaphekar@tceq.texas.gov

[Take our customer satisfaction survey at www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

From: [Hervey, Carolyn](#)
To: [Vasant Chaphekar](#)
Cc: [Megan Yao](#); [Reza, Jennifer](#)
Subject: Re: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant
Date: Thursday, December 19, 2024 12:16:28 PM
Attachments: [image001.png](#)
[image.png](#)
[O3759\(Project 35475\) - OP-PBRSUP Final OP-SUMR 12.19.2024.pdf](#)

Mr. Vasant,

Per your e-mail received on 12/04/2024 regarding the Working Draft Permit (WDP) for Title V Permit O 3759 (Project No. 35475), the following are Kuraray America Inc.'s (Kuraray) responses to your remaining inquiry regarding the WDP:

3) Please review NSR authorization for all units (pages 102-105) and check if they are valid. Some units such as TOTES, T-918 appear to be authorized by a PBR that may need a registration (Registered PBR). If any changes are made, it may affect OP-PBRSUP table.

Kuraray's Response: Please refer to the attachment which includes an updated OP-PBRSUP and OP-SUMR for the totes. As stated within the previous response sent on 12/17/2024, T-918 previously authorized under PBR Registration No. 147158 was consolidated into NSR 96510 during the NSR renewal and amendment in 2022. The OP-SUMR for T-918 was provided in the response on 12/17/2024 as well.

As for the periodic monitoring requirements for the scrubbers within the WDP, Kuraray has no further comments and accepts the scrubbers PM requirements as stated.

Feel free to contact me if you have any additional questions and/or need any more information. Thank you again!

Regards,
Carolyn Hervey



HSES Environmental Air Specialist
Kuraray America Inc.
12342 Strang Road
LaPorte, Texas 77571
Office: (832) 568-8328

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From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Sent: Wednesday, December 4, 2024 2:17 PM
To: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>
Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Carolyn,

Thx for your prompt response. I have conducted a technical review of your renewal application for your Title V Permit (O3759/Project 35475 Kuraray America, Inc./PVOH Plant). An electronic copy of a Working Draft Permit (WDP) is attached for your review/comments. The WDP contains TCEQ's determination of the applicable state/federal requirements based on the information submitted in your application, and any updates provided thereafter. Appreciate if you would acknowledge receipt of this email.

Please review the WDP (version 12042024) and submit any comments by COB, Thursday, 12/19/2024 or earlier. You must submit a written response by this deadline, even if you are not making any comments on the content of the WDP. *Please note that the WDP includes several changes/assumptions/requests for information which are listed below.* Along with your WDP comments please provide an itemized response to each item listed.

Please note the following:

- 1) The OP-PBRSUP dated 11/04/2024 is missing Table A – please submit a revised and complete OP-PBRSUP table dated 11/04/2024 which contains all tables A through D. If a table (such as Table C) contains no units or PBRs include it with the notation “Not Applicable”.
- 2) To facilitate data entry, tank units EPN12TK, EPN13TK, PORTTK, V-021, V-022, V-023, V-024 for which a permit shield has been requested have been grouped. Let me know if you disagree with the grouping.
- 3) Please review NSR authorization for all units (pages 102-105) and check if they are valid. Some units such as TOTES, T-918 appear to be authorized by a PBR that may need a registration (Registered PBR). If any changes are made, it may affect OP-PBRSUP table.

Please review the "SOP Technical Review Fact Sheet" located at https://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf. This guidance contains important information regarding WDP review and comment procedures. Note that a Certification by Responsible Official (Form OP-CRO1) for any as yet uncertified submittals, including the WDP response, is required to be submitted (via STEERS or as a hard copy). I will advise you at a later date regarding the specifics of the OP-CRO1 form submittal. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,
Vasant

From: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>
Sent: Wednesday, December 4, 2024 11:35 AM
To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>

Subject: Re: [External]RE: Project status -- 03759/Project 35475 Kuraray America, Inc./PVOH Plant

Good Morning Mr. Vasant!

Per your e-mail inquiry received yesterday, (12/3/2024), Kuraray America Inc. (Kuraray) provides the following responses:

1. Item 1- Please confirm if ABRASIVE unit is authorized only under NSR 96510 or only under PBR 106.454 or under both. Suggest you submit a revised OP-SUMR to document the NSR/PBR authorizations.

Kuraray's Response: ABRASIVE unit was only authorized under PBR 106.452. The facility does not have blasting activities onsite; therefore, Kuraray is requesting not to include ABRASIVE unit in the SOP and to remove PBR 106.452 from the SOP. This was reflected in the OP-REQ1 submitted on 11/5/2024. Additionally, the OP-SUMR submitted on 4/24/2024 for ABRASIVE unit needs to be removed.

2. Item 7- OP-MON (submitted as an attachment to your email dated 11/05/2024) appears to include PMG-LF-V-052 as a standard PM option which is not supported by TCEQ. Please refer to periodicmon.pdf for list of valid PM options for monitoring VOCs which is the pollutant being monitored under Ch 115.412(1) main standard. Please re-submit OP-MON form.

Kuraray's Response: The PM option is PM-V-052. Please see the attached updated OP-MON.

Please confirm your receipt of this e-mail response. Feel free to contact me if you have any additional questions and/or need more information. Thank you!

Regards,

Carolyn Hervey

kuraray

HSES Environmental Air Specialist

Kuraray America Inc.

12342 Strang Road

LaPorte, Texas 77571

Office: (832) 568-8328

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From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Sent: Tuesday, December 3, 2024 9:36 AM

To: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>

Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>

Subject: RE: [External]RE: Project status -- 03759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Carolyn,

Re: item 7 perhaps you intended to list PM-V-052 as the standard PM option on the OP-MON form (instead of

PMG-LF-V-052). Please confirm.
Thanks,
Vasant

From: Vasant Chaphekar
Sent: Tuesday, December 3, 2024 9:31 AM
To: 'Hervey, Carolyn' <Carolyn.Hervey@kuraray.com>
Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Carolyn,
Below are follow up questions (in blue) to your responses on items 1 and 7. Appreciate your response by close of business on Friday, 12/6/2024.
Thanks,
Vasant

From: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>
Sent: Tuesday, November 5, 2024 11:22 AM
To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: Re: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Good Morning Mr. Vasant!

My apologies you did not receive this information yesterday. It was sent; however, I am currently traveling for work and do not have stable network connections, so there is a delay in my e-mails being sent. So, I'm resending to ensure your receipt. Thank you!

Regards,
Carolyn Hervey

HSES Environmental Air Specialist
Kuraray America Inc.
12342 Strang Road
LaPorte, Texas 77571
Office: (832) 568-8328

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Good Morning Mr. Vasant!

Per your e-mail request received on October 23rd, 2024, Kuraray America Inc. (Kuraray) provides the following responses to your inquiries:

1) ABRASIVE unit appears to have multiple/inconsistent authorizations: OP-2 Table 2, rev 1 shows it is authorized under NSR 96510, OP-SUMR Table 1 dated 4/24/24 shows authorization only under PBR 106.454, and OP-PBRSUP Table B dated 4/24/24, page 2, ABRASIVE unit is authorized under PBR 106.452 09/04/2000. Please resolve all inconsistencies and re-submit OP-SUMR and OP-PBRSUP tables.

Kuraray's Response: The facility does not have blasting activities onsite. Kuraray requests to remove PBR 106.452/09/04/2000 from O3759. Please see the updated OP-PBRSUP Table B and updated Page 88 of OP-REQ1 in the attachment.

Question: Please confirm if ABRASIVE unit is authorized only under NSR 96510 or only under PBR 106.454 or under both. Suggest you submit a revised OP-SUMR to document the NSR/PBR authorizations.

2) OP-REQ1 form, page 87, change issuance date for NSR 96510 from 7/24/2023 to 8/9/2024 (per project 362638). Please submit revised OP-REQ1 page.

Kuraray's Response: Please see the updated OP-REQ1 Page 87 in the attachment.

3) Are FUGITIVES unit listed on UA12 form different than FUGITIVES units listed in OP-PBRSUP and authorized under PBR 147877 and 172343?

Kuraray's Response: FUGITIVES on OP-UA12 is the same unit as the one listed on OP-PBRSUP. PBR 147877 authorizes the fugitive components associated with the third dryer added to the site and is incorporated into NSR 95610 by reference. PBR 172343 authorizes annual fugitive changes and will be incorporated into NSR 96510 at the next amendment or renewal.

4) Please submit an OP-SUMR form to document ALL units listed in Tables A, B and D of OP-PBRSUP that are not currently listed in the SOP renewal application (a list of units and their NSR/PBR authorization included in a draft version of the WDP is attached). For example, PLTMSS, PLTRPL, PLTREF, CTLOADING, FOAMTK, C3111SCRUB, etc. appear to be missing from the attached Excel file. If these units have other state or federal applicable requirements, please submit applicable OP-UA forms. For units that are listed on the attached spread sheet and in the OP-PBRSUP form, e.g., FUGITIVES, EMGEN, please confirm all NSR/PBR authorizations are correctly listed.

Kuraray's Response: Please see attached OP-SUMR and OP-PBRSUP. Items 1 to 3 on OP-2 address the applicability for these units.

5) For FUGITIVES unit, OP-UA1, subject to MON requirements under MACT FFFF please make sure you have submitted the following forms (as applicable) to determine MACT FFFF requirements: UA60, UA58, UA52, UA45, UA15, UA14, UA13.

Kuraray's Response: Kuraray has submitted applicable forms OP-UA3, OP-UA4, OP-UA13, OP-UA15, and OP-UA60 with the renewal application dated Aug 4, 2023. All MACT FFFF applicability has been represented in the permit and any subsequent application submittals.

6) GRPTKG1ABS will be deleted since it has only 1 unit T-912, UA3. To restore the group, you will need to include at least 2 units.

Kuraray's Response: Kuraray agrees to remove the group ID GRPTKG1ABS from the permit.

7) Periodic Monitoring (PM) is required for DEGREASE unit subject to 30 TAC Ch 115. Please submit OP-MON form to demonstrate compliance with Ch 115.412(1) main standard.

Kuraray's Response: Kuraray is submitting the updated OP-UA16 and OP-MON in the attachment.

Question: OP-MON (submitted as an attachment to your email dated 11/05/2024) appears to include PMG-LF-V-052 as a standard PM option which is not supported by TCEQ. Please refer to [periodicmon.pdf](#) for list of valid PM options for monitoring VOCs which is the pollutant being monitored under Ch 115.412(1) main standard. Please re-submit OP-MON form.

8) FL-051 unit, UA7, pages 5 and 6, HRVOC Vent Gas, NO codes for alternative monitoring approach and Modifications to Testing/Monitoring are interpreted as OTHER, NONE code respectively. Please confirm.

Kuraray's Response: Please see attached OP-UA7 – Updated Page 5.

Please confirm your receipt of this e-mail response. Feel free to contact me if you have any additional questions and/or need more information. Thank you!

Regards,
Carolyn Hervey


HSES Environmental Air Specialist
Kuraray America Inc.
12342 Strang Road
LaPorte, Texas 77571
Office: (832) 568-8328

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From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Sent: Wednesday, October 23, 2024 3:35 PM
To: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>
Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Carolyn,

I have conducted a technical review of your renewal application for your Title V Permit (O3759/Project 35475 Kuraray America, Inc./PVOH Plant). Please provide the following information required to generate a working draft of the permit (WDP):

- 1) ABRASIVE unit appears to have multiple/inconsistent authorizations: OP-2 Table 2, rev 1 shows it is authorized under NSR 96510, OP-SUMR Table 1 dated 4/24/24 shows authorization only under PBR 106.454, and OP-PBRSUP Table B dated 4/24/24, page 2, ABRASIVE unit is authorized under PBR 106.452 09/04/2000. Please resolve all inconsistencies and re-submit OP-SUMR and OP-PBRSUP tables.
- 2) OP-REQ1 form, page 87, change issuance date for NSR 96510 from 7/24/2023 to 8/9/2024 (per project 362638). Please submit revised OP-REQ1 page.
- 3) Are FUGITIVES unit listed on UA12 form different than FUGITIVES units listed in OP-PBRSUP and authorized under PBR 147877 and 172343?
- 4) Please submit an OP-SUMR form to document ALL units listed in Tables A, B and D of OP-PBRSUP that are not currently listed in the SOP renewal application (a list of units and their NSR/PBR authorization included in a draft version of the WDP is attached). For example, PLTMSS, PLTRPL, PLTREF, CTLLOADING, FOAMTK, C3111SCRUB, etc. appear to be missing from the attached Excel file. If these units have other state or federal applicable requirements, please submit applicable OP-UA forms. For units that are listed on the attached spread sheet and in the OP-PBRSUP form, e.g., FUGITIVES, EMGEN, please confirm all NSR/PBR authorizations are correctly listed.
- 5) For FUGITIVES unit, OP-UA1, subject to MON requirements under MACT FFFF please make sure you have submitted the following forms (as applicable) to determine MACT FFFF requirements: UA60, UA58, UA52, UA45, UA15, UA14, UA13,
- 6) GRPTKGTABS will be deleted since it has only 1 unit T-912, UA3. To restore the group, you will need to include at least 2 units.
- 7) Periodic Monitoring (PM) is required for DEGREASE unit subject to 30 TAC Ch 115. Please submit OP-MON form to demonstrate compliance with Ch 115.412(1) main standard.
- 8) FL-051 unit, UA7, pages 5 and 6, HRVOC Vent Gas, NO codes for alternative monitoring approach

and Modifications to Testing/Monitoring are interpreted as OTHER, NONE code respectively. Please confirm.

Contact me if you have any questions. Appreciate your itemized response by Monday, November 4, 2024, or earlier.

Thank you for your cooperation.

Sincerely,
Vasant

From: Reza, Jennifer <Jennifer.Reza@kuraray.com>
Sent: Tuesday, October 15, 2024 3:08 PM
To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Cc: Megan Yao <myao@spiritenv.com>; Hervey, Carolyn <Carolyn.Hervey@kuraray.com>
Subject: Re: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Vasant,

The records that I thought I owed you had actually already been submitted. I see that Megan has already reached out to you for an update so we will wait to hear back from you as to what information you still need.

Additionally, Carolyn Hervey will be the primary contact for Kuraray moving forward. I am including her on this email.

Thank you,

Jenn Reza

Office: 281-549-9479
Mobile: 281-786-7155

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From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Sent: Tuesday, October 15, 2024 2:57 PM
To: Reza, Jennifer <Jennifer.Reza@kuraray.com>
Cc: Megan Yao <myao@spiritenv.com>
Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Jenn,
Thx for your email. Re: submittal of records – I have noted that you are planning to submit them soon. No problem. As mentioned in my email, if we need to talk, we should do so via a Teams call/meeting.
Vasant

From: Reza, Jennifer <Jennifer.Reza@kuraray.com>

Sent: Tuesday, October 15, 2024 2:51 PM

To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Cc: Megan Yao <myao@spiritenv.com>

Subject: Re: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Vasant,

I was the one calling. I wanted to touch base with you. I have moved out of our environmental department and am realizing that I forgot to follow up on this project. I believe that you are still waiting on submittal of some records. I think at the time my attention was split between several things and I thought the submittal was in the FTPS not STEERS. I am working with the DAR to get the documents officially submitted right now.

I appreciate your patience.

Thank you,

Jenn Reza

Office: 281-549-9479

Mobile: 281-786-7155

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From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Sent: Tuesday, October 15, 2024 2:46 PM

To: Megan Yao <myao@spiritenv.com>

Cc: Reza, Jennifer <Jennifer.Reza@kuraray.com>

Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Megan,

I got a call from Kuraray (Ph 281-786-7155) a few minutes ago but I could not connect with the caller. Do you know who may be calling? It would be best to talk via a Teams call.

Thanks,

Vasant

From: Megan Yao <myao@spiritenv.com>

Sent: Tuesday, October 8, 2024 2:03 PM

To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Mr. Chaphekar,

Thank you for your response!

Megan Yao

Associate Project Manager

DIRECT 281-664-2837 | **MOBILE** 832-603-7982

myao@spiritenv.com



From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Sent: Tuesday, October 8, 2024 1:20 PM

To: Megan Yao <myao@spiritenv.com>

Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Megan,

Thx for your email. Project status – working on resolving errors in the application to generate a working draft permit (WDP). As an example, FL-051 unit, UA7, pages 5 and 6, HRVOC Vent Gas, NO codes for alternative monitoring approach and Modifications to Testing/Monitoring appear to be invalid. Next step - I will send you a complete list of missing (or incorrect) codes, or other info required to generate the WDP.

Vasant

From: Megan Yao <myao@spiritenv.com>

Sent: Tuesday, October 8, 2024 10:50 AM

To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Good morning Mr. Chaphekar,

Could you please give us an update on the status of O3759 renewal (Project No. 35475)? Thank you,

Megan Yao

Associate Project Manager

DIRECT 281-664-2837 | **MOBILE** 832-603-7982

myao@spiritenv.com



From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Sent: Thursday, April 25, 2024 10:54 AM

To: Megan Yao <myao@spiritenv.com>

Cc: Reza, Jennifer <Jennifer.Reza@kuraray.com>; Robert Osborn <rosborn@spiritenv.com>

Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Rec'd. Thx.

From: Megan Yao <myao@spiritenv.com>

Sent: Wednesday, April 24, 2024 8:21 PM

To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Cc: Reza, Jennifer <Jennifer.Reza@kuraray.com>; Robert Osborn <rosborn@spiritenv.com>

Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Mr. Chaphekar, Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Please see the responses in bold embedded in the email below and the updated forms. Thank you,
Megan

From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Sent: Thursday, April 18, 2024 11:19 AM

To: Reza, Jennifer <Jennifer.Reza@kuraray.com>

Subject: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Correction

PBR's 106.433, 106.452 are listed in *current permit* but not in OP-PBR SUP. Please revise applicable forms to maintain consistency.

From: Vasant Chaphekar

Sent: Thursday, April 18, 2024 11:18 AM

To: 'Jennifer.reza@kuraray.com' <Jennifer.reza@kuraray.com>

Subject: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Good morning Ms. Reza,

Above referenced project has been reassigned to me. Going forward, I will be processing your application for renewal of your Title V permit (O3759/Project 35475 Kuraray America, Inc./PVOH Plant). Please address all correspondence pertaining to this permit application, including e-mails and updates, to me at the address below, and use the Permit Project reference numbers shown above in the subject line to facilitate tracking. Recommend that all parties on this distribution list use (reply to) the same 'thread' of e-mail rather than create a new one so that at the end of the project we have a complete documentation of all project related e-mails. Any project related email communication sent to me without the subject header "O3759/Project 35475 Kuraray America, Inc./PVOH Plant" may result in delays.

To facilitate timely communication, I would appreciate if you would acknowledge receipt of all e-mail's, especially if any action is required. If additional or missing information is required, you will typically be requested to submit it by a 'due date' (that is determined by me based on the amount and complexity of info requested, time allocated to complete this project, and my project loading). If you have any questions or concerns regarding the due date, please contact me asap.

As an initial request, please submit the following info as soon as practical:

1. In OP-REQ1, NSR permit 95610 issuance date is shown as 09/17/2012 which appears to be incorrect. Should be 09/15/2022?

Kuraray's response: Please see attached updated OP-REQ1 Page 87 with the updated issuance date for NSR 96510. The NSR renewal and amendment application was completed 7/24/2023 (Project #347692).

2. Current FOP includes a compliance schedule. Please confirm this schedule is no longer required based on OP-ACPS form. Correct?

Kuraray's response: The current Title V permit is effective June 2022 and does not contain a compliance schedule. These schedules were removed during the 2022 significant revision (Project #32814).

3. PBR's 106.433, 106.452 are listed in OP-REQ1 but not in OP-PBR SUP. Please revise applicable forms to maintain consistency.

Kuraray's response: Kuraray requests to remove PBR 106.433 from the permit because the site does not have a surface coating facility. Please see attached updated OP-REQ1 Page 88, updated OP-PBR SUP, and OP-SUMR associated with PBR 106.452.

Please be advised that all federal operating permit (Title V) correspondence from TCEQ, including final actions, for this project will be sent via e-mail.

If you have any questions or concerns on any of these items or think you need to do any additional updates, let me know and we can discuss further.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1. This form will be requested at a later date.

If you choose to submit your application updates through STEERS, please notify me when these updates have been submitted.

I plan to conduct an in-depth technical review of your application and may contact you again to request additional information. Please contact me if you have any questions regarding the project schedule, or any other details regarding your application or permit. I look forward to working with you on this project.

Sincerely,

Vasant Chaphekar, P.E.

Technical Specialist, Air Permits Division

Texas Commission on Environmental Quality

P.O. Box 13087, MC 163

Austin, TX 78711

Ph: (512) 239-1341

Fax: (512) 239-1400

Vasant.Chaphekar@tceq.texas.gov

[Take our customer satisfaction survey at www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR
[Table 1](#)

Date		Permit No.	Regulated Entity No.
12/17/2024		O3759	RN106155849

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description147877	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Title I Authorizations
		C3111HDR	OP-UA15	Scrubber C311-1 Vent Header		96510 106.262/11/01/2003 [147877]	
		T-918	OP-UA3	PVAC Paste Tank		106.261/11/01/2003; 106.262/11/01/2003 96510	

Form OP-REQ2
Negative Applicable/Superseded Requirement Determinations
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
12/17/2024	O3759	RN106155849

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
	3	T-061	OP-UA3	40 CFR Part 63, Subpart FFFF	63.2485(c)	Wastewater stream is Group 2 under MON. Wastewater streams only contain compounds listed in Table 9 of 40CFR Part 63, Subpart FFFF. The combined total annual average concentration of compounds is less than 30,000 ppmw.
	3	V-606	OP-UA3	40 CFR Part 63, Subpart FFFF	63.2485(c)	Wastewater stream is Group 2 under MON. Wastewater streams only contain compounds listed in Table 9 of 40CFR Part 63, Subpart FFFF. The combined total annual average concentration of compounds is less than 30,000 ppmw.
	3	T-920	OP-UA3	40 CFR Part 63, Subpart FFFF	63.2485(c)	Wastewater stream is Group 2 under MON. Wastewater streams only contain compounds listed in Table 9 of 40CFR Part 63, Subpart FFFF. The combined total annual average concentration of compounds is less than 30,000 ppmw.

Permit By Rule Supplemental Table (Page 1)

Table A: Registered Permits by Rule (30 TAC Chapter 106) for the Application Area

Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
12/17/2024	O3759	RN106155849

Unit ID No.	Registration No.	PBR No.	Registration Date
C3111SCRUB	147877	106.262	9/14/2017
C3111HDR	147877	106.262	9/14/2017
FUGITIVES	147877	106.262	9/14/2017
FUGITIVES	172343	106.261 106.262	4/27/2023

Permit By Rule Supplemental Table (Page 2)

Table B: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for the Application Area

Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
12/17/2024	O3759	RN106155849

Unit ID No.	PBR No.	Version No./Date
PLTMSS	106.263	11/1/2001
PLTRPL	106.264	09/04/2000
PLTREF	106.373	09/04/2000
DEGREASE	106.454	11/01/2001
CLLOADING	106.472	09/04/2000
DIESELULD	106.473	09/04/2000
FOAMTK	106.476	09/04/2000
V-021	106.478	09/04/2000
V-022	106.478	09/04/2000
V-023	106.478	09/04/2000
V-024	106.478	09/04/2000
EPN12TK	106.478	09/04/2000
EPN13TK	106.478	09/04/2000
PORTTK	106.478	09/04/2000
EMGEN	106.511	09/04/2000
TOTES	106.472 106.478	09/04/2000 09/04/2000

Permit By Rule Supplemental Table (Page 3)
Table C: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for Insignificant Sources for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
12/17/2024	O3759	RN106155849

PBR No.	Version No./Date
Not Applicable	

Permit By Rule Supplemental Table (Page 4)

Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area

Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
12/17/2024	O3759	RN106155849

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
C3111SCRUB	106.262	147877	Monitor the liquid flow rate once per week. The option to monitor the liquid flow rate, liquid supply pressure, and the liquid flow rate and gas flow rate are provided as monitoring options because monitoring these parameters can indicate malfunctions in the liquid pumping equipment, blockage of pipes or spray nozzles. Monitor the outlet water temperature hourly. The scrubbers were designed to operate at a maximum outlet scrubbing liquid temperature of 90°F.
FUGITIVES	106.262 106.262	147877 11/1/2003	Each component in the process unit must be monitored according to the requirements of Subchapter D, Division 3 of Ch. 115. A component is considered repaired: for all other components, when the component is demonstrated to no longer have a leak after adjustments or alterations to the component by the normal monitoring method required under Ch. 115 Subchapter H.
FUGITIVES	106.261 106.262 106.261	172343 11/1/2003	Each component in the process unit must be monitored according to the requirements of Subchapter D, Division 3 of Ch. 115. A component is considered repaired: for all other components, when the component is demonstrated to no longer have a leak after adjustments or alterations to the component by the normal monitoring method required under Ch. 115 Subchapter H.
PLTMSS	106.263	11/1/2001	Keep records of: (1) the type and reason for the activity or facility construction; (2) the processes and equipment involved; (3) the date, time, and duration of the activity or facility operation; and (4) the air contaminants and amounts which are emitted as a result of the activity or facility operation.
PLTRPL	106.264	09/04/2000	There will be no increase in capacity, production rate, or throughput as a result of the replacement.

Permit By Rule Supplemental Table (Page 4)

Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area

Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
12/17/2024	O3759	RN106155849

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
PLTREF	106.373	09/04/2000	Keep all required records at the site to demonstrate compliance.
DEGREASE	106.454	11/01/2001	On a monthly basis, records shall be kept of total solvent makeup (gross usage minus waste disposal).
CTLOADING	106.472	09/04/2000	No visible emissions occur. Keep all required records at the site to demonstrate compliance.
DIESELTK	106.473	09/04/2000	Maintain daily record of the following: The identification number of each tank-truck tank for which annual leak testing is required under §115.214(a)(1)(C) or (b)(1)(C); The quantity of VOC loaded into each transport vessel; The date of the last leak testing of each tank-truck tank as required by §115.214(a)(1)(C) or (b)(1)(C); A record of the type and vapor pressure of each VOC transferred (excluding gasoline).
FOAMTK	106.476	09/04/2000	Continuously monitor one or more operational parameters sufficient to demonstrate proper functioning of the control device to design specifications.
V-021	106.478	09/04/2000	Keep all required records at the site to demonstrate compliance.
V-022	106.478	09/04/2000	Keep all required records at the site to demonstrate compliance.
V-023	106.478	09/04/2000	Keep all required records at the site to demonstrate compliance.
V-024	106.478	09/04/2000	Keep all required records at the site to demonstrate compliance.
EPN12TK	106.478	09/04/2000	Keep all required records at the site to demonstrate compliance.

Permit By Rule Supplemental Table (Page 4)

Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area

Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
12/17/2024	O3759	RN106155849

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
EPN13TK	106.478	09/04/2000	Keep all required records at the site to demonstrate compliance.
PORTTK	106.478	09/04/2000	Keep all required records at the site to demonstrate compliance.
EMGEN	106.511	09/04/2000	Maintain records of annual operating hours of the engine.
C3111HDR	106.262	09/14/2017	Keep all required records at the site to demonstrate compliance.
TOTES	106.472 106.478	09/04/2000 09/04/2000	Keep all required records at the site to demonstrate compliance.

From: [Hervey, Carolyn](#)
To: [Vasant Chaphekar](#)
Cc: [Megan Yao](#); [Reza, Jennifer](#)
Subject: Re: [External]RE: Project status -- Q3759/Project 35475 Kuraray America, Inc./PVOH Plant
Date: Tuesday, December 17, 2024 5:01:50 PM
Attachments: [image001.png](#)
[image.png](#)
[Q3759\(Project 35475\) - OP-PBRSUP Final OP-SUMR 12.17.2024.doc](#)
[WDP Review - OP-REQ2 12.17.24.pdf](#)

Mr. Vasant,

Per your e-mail received on 12/04/2024 regarding the Working Draft Permit (WDP) for Title V Permit O 3759 (Project No. 35475), the following are Kuraray America Inc.'s (Kuraray) responses to your inquiries and comments regarding the WDP:

1) The OP-PBRSUP dated 11/04/2024 is missing Table A – please submit a revised and complete OP-PBRSUP table dated 11/04/2024 which contains all tables A through D. If a table (such as Table C) contains no units or PBRs include it with the notation “Not Applicable”.

Kuraray's Response: Please see the attached OP-PBRSUP.

2) To facilitate data entry, tank units EPN12TK, EPN13TK, PORTTK, V-021, V-022, V-023, V-024 for which a permit shield has been requested have been grouped. Let me know if you disagree with the grouping.

Kuraray's Response: Kuraray agrees with the grouping.

3) Please review NSR authorization for all units (pages 102-105) and check if they are valid. Some units such as TOTES, T-918 appear to be authorized by a PBR that may need a registration (Registered PBR). If any changes are made, it may affect OP-PBRSUP table.

Kuraray's Response: Please see the OP-SUMR for these units. T-918 previously authorized under PBR Registration No. 147158 was consolidated into NSR 96510 during the NSR renewal and amendment in 2022. We continue to look into the NSR authorizations for Unit ID TOTES and will respond by 12/19/2024.

Kuraray has the following comment for the WDP:

- Three wastewater units T-061, T-920, and V-606 are not Group 1 under MON. Please remove the three units with SOP Index No. 63FFFF-1 from the Unit Summary and the Applicable Requirements Summary of the WDP. Kuraray requests to add 63FFFF permit shields to these units. Please see attached OP-REQ2 for the three units.
- We've identified differences in the periodic monitoring summaries for the absorbers within the WDP and the current permit. We would like to schedule a call tomorrow to further discuss the PM summary. At your earliest convenience, please provide your availability tomorrow.

We look forward to hearing from you soon regarding our request for a meeting. Additionally, feel free to contact me if you have any questions and/or need any additional information. Thank you!

Regards,
Carolyn Hervey

HSES Environmental Air Specialist
Kuraray America Inc.
12342 Strang Road

LaPorte, Texas 77571
Office: (832) 568-8328

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From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Sent: Wednesday, December 4, 2024 2:17 PM
To: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>
Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Carolyn,

Thx for your prompt response. I have conducted a technical review of your renewal application for your Title V Permit (O3759/Project 35475 Kuraray America, Inc./PVOH Plant). An electronic copy of a Working Draft Permit (WDP) is attached for your review/comments. The WDP contains TCEQ's determination of the applicable state/federal requirements based on the information submitted in your application, and any updates provided thereafter. Appreciate if you would acknowledge receipt of this email.

Please review the WDP (version 12042024) and submit any comments by COB, Thursday, 12/19/2024 or earlier. You must submit a written response by this deadline, even if you are not making any comments on the content of the WDP. *Please note that the WDP includes several changes/assumptions/requests for information which are listed below.* Along with your WDP comments please provide an itemized response to each item listed.

Please note the following:

- 1) The OP-PBR SUP dated 11/04/2024 is missing Table A – please submit a revised and complete OP-PBR SUP table dated 11/04/2024 which contains all tables A through D. If a table (such as Table C) contains no units or PBRs include it with the notation “Not Applicable”.
- 2) To facilitate data entry, tank units EPN12TK, EPN13TK, PORTTK, V-021, V-022, V-023, V-024 for which a permit shield has been requested have been grouped. Let me know if you disagree with the grouping.
- 3) Please review NSR authorization for all units (pages 102-105) and check if they are valid. Some units such as TOTES, T-918 appear to be authorized by a PBR that may need a registration (Registered PBR). If any changes are made, it may affect OP-PBR SUP table.

Please review the "SOP Technical Review Fact Sheet" located at https://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf. This guidance contains important information regarding WDP review and comment procedures.

Note that a Certification by Responsible Official (Form OP-CRO1) for any as yet uncertified submittals, including the WDP response, is required to be submitted (via STEERS or as a hard copy). I will advise you at a later date regarding the specifics of the OP-CRO1 form submittal. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,
Vasant

From: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>
Sent: Wednesday, December 4, 2024 11:35 AM
To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: Re: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Good Morning Mr. Vasant!

Per your e-mail inquiry received yesterday, (12/3/2024), Kuraray America Inc. (Kuraray) provides the following responses:

1. Item 1- Please confirm if ABRASIVE unit is authorized only under NSR 96510 or only under PBR 106.454 or under both. Suggest you submit a revised OP-SUMR to document the NSR/PBR authorizations.

Kuraray's Response: ABRASIVE unit was only authorized under PBR 106.452. The facility does not have blasting activities onsite; therefore, Kuraray is requesting not to include ABRASIVE unit in the SOP and to remove PBR 106.452 from the SOP. This was reflected in the OP-REQ1 submitted on 11/5/2024. Additionally, the OP-SUMR submitted on 4/24/2024 for ABRASIVE unit needs to be removed.

2. Item 7- OP-MON (submitted as an attachment to your email dated 11/05/2024) appears to include PMG-LF-V-052 as a standard PM option which is not supported by TCEQ. Please refer to periodicmon.pdf for list of valid PM options for monitoring VOCs which is the pollutant being monitored under Ch 115.412(1) main standard. Please re-submit OP-MON form.

Kuraray's Response: The PM option is PM-V-052. Please see the attached updated OP-MON.

Please confirm your receipt of this e-mail response. Feel free to contact me if you have any additional questions and/or need more information. Thank you!

Regards,
Carolyn Hervey

HSES Environmental Air Specialist
Kuraray America Inc.
12342 Strang Road
LaPorte, Texas 77571

Office: (832) 568-8328

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From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Sent: Tuesday, December 3, 2024 9:36 AM
To: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>
Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Carolyn,
Re: item 7 perhaps you intended to list PM-V-052 as the standard PM option on the OP-MON form (instead of PMG-LF-V-052). Please confirm.
Thanks,
Vasant

From: Vasant Chaphekar
Sent: Tuesday, December 3, 2024 9:31 AM
To: 'Hervey, Carolyn' <Carolyn.Hervey@kuraray.com>
Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Carolyn,
Below are follow up questions (in blue) to your responses on items 1 and 7. Appreciate your response by close of business on Friday, 12/6/2024.
Thanks,
Vasant

From: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>
Sent: Tuesday, November 5, 2024 11:22 AM
To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: Re: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Good Morning Mr. Vasant!

My apologies you did not receive this information yesterday. It was sent; however, I am currently traveling for work and do not have stable network connections, so there is a delay in my e-mails being sent. So, I'm resending to ensure your receipt. Thank you!

Regards,
Carolyn Hervey

HSES Environmental Air Specialist
Kuraray America Inc.
12342 Strang Road
LaPorte, Texas 77571
Office: (832) 568-8328

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Good Morning Mr. Vasant!

Per your e-mail request received on October 23rd, 2024, Kuraray America Inc. (Kuraray) provides the following responses to your inquiries:

1) ABRASIVE unit appears to have multiple/inconsistent authorizations: OP-2 Table 2, rev 1 shows it is authorized under NSR 96510, OP-SUMR Table 1 dated 4/24/24 shows authorization only under PBR 106.454, and OP-PBRSUP Table B dated 4/24/24, page 2, ABRASIVE unit is authorized under PBR 106.452 09/04/2000. Please resolve all inconsistencies and re-submit OP-SUMR and OP-PBRSUP tables.

Kuraray's Response: The facility does not have blasting activities onsite. Kuraray requests to remove PBR 106.452/09/04/2000 from O3759. Please see the updated OP-PBRSUP Table B and updated Page 88 of OP-REQ1 in the attachment.

Question: Please confirm if ABRASIVE unit is authorized only under NSR 96510 or only under PBR 106.454 or under both. Suggest you submit a revised OP-SUMR to document the NSR/PBR authorizations.

2) OP-REQ1 form, page 87, change issuance date for NSR 96510 from 7/24/2023 to 8/9/2024 (per project 362638). Please submit revised OP-REQ1 page.

Kuraray's Response: Please see the updated OP-REQ1 Page 87 in the attachment.

3) Are FUGITIVES unit listed on UA12 form different than FUGITIVES units listed in OP-PBRSUP and authorized under PBR 147877 and 172343?

Kuraray's Response: FUGITIVES on OP-UA12 is the same unit as the one listed on OP-PBRSUP. PBR 147877 authorizes the fugitive components associated with the third dryer added to the site and is incorporated into NSR 95610 by reference. PBR 172343 authorizes annual fugitive changes and will be incorporated into NSR 96510 at the next amendment or renewal.

4) Please submit an OP-SUMR form to document ALL units listed in Tables A, B and D of OP-PBRSUP that are not currently listed in the SOP renewal application (a list of units and their NSR/PBR authorization included in a draft version of the WDP is attached). For example, PLTMSS, PLTRPL, PLTREF, CTLOADING, FOAMTK, C3111SCRUB, etc. appear to be missing from the attached Excel file. If these units have other state or federal applicable requirements, please submit applicable OP-UA forms. For units that are listed on the attached spread sheet and in the OP-PBRSUP form, e.g., FUGITIVES, EMGEN, please confirm all NSR/PBR authorizations are correctly listed.

Kuraray's Response: Please see attached OP-SUMR and OP-PBRSUP. Items 1 to 3 on OP-2 address the applicability for these units.

5) For FUGITIVES unit, OP-UA1, subject to MON requirements under MACT FFFF please make sure you have submitted the following forms (as applicable) to determine MACT FFFF requirements: UA60, UA58, UA52, UA45, UA15, UA14, UA13.

Kuraray's Response: Kuraray has submitted applicable forms OP-UA3, OP-UA4, OP-UA13, OP-UA15, and OP-UA60 with the renewal application dated Aug 4, 2023. All MACT FFFF applicability has been represented in the permit and any subsequent application submittals.

6) GRPTKGTABS will be deleted since it has only 1 unit T-912, UA3. To restore the group, you will need to include at least 2 units.

Kuraray's Response: Kuraray agrees to remove the group ID GRPTKG1ABS from the permit.

7) Periodic Monitoring (PM) is required for DEGREASE unit subject to 30 TAC Ch 115. Please submit OP-MON form to demonstrate compliance with Ch 115.412(1) main standard.

Kuraray's Response: Kuraray is submitting the updated OP-UA16 and OP-MON in the attachment.

Question: OP-MON (submitted as an attachment to your email dated 11/05/2024) appears to include PMG-LF-V-052 as a standard PM option which is not supported by TCEQ. Please refer to [periodicmon.pdf](#) for list of valid PM options for monitoring VOCs which is the pollutant being monitored under Ch 115.412(1) main standard. Please re-submit OP-MON form.

8) FL-051 unit, UA7, pages 5 and 6, HRVOC Vent Gas, NO codes for alternative monitoring approach and Modifications to Testing/Monitoring are interpreted as OTHER, NONE code respectively. Please confirm.

Kuraray's Response: Please see attached OP-UA7 – Updated Page 5.

Please confirm your receipt of this e-mail response. Feel free to contact me if you have any additional questions and/or need more information. Thank you!

Regards,

Carolyn Hervey

kuraray

HSES Environmental Air Specialist

Kuraray America Inc.

12342 Strang Road

LaPorte, Texas 77571

Office: (832) 568-8328

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From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Sent: Wednesday, October 23, 2024 3:35 PM

To: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>

Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>

Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Carolyn,

I have conducted a technical review of your renewal application for your Title V Permit (O3759/Project 35475 Kuraray America, Inc./PVOH Plant). Please provide the following information required to generate a working draft of the permit (WDP):

- 1) ABRASIVE unit appears to have multiple/inconsistent authorizations: OP-2 Table 2, rev 1 shows it is authorized under NSR 96510, OP-SUMR Table 1 dated 4/24/24 shows authorization only under PBR 106.454, and OP-PBRSUP Table B dated 4/24/24, page 2, ABRASIVE unit is authorized under PBR 106.452 09/04/2000. Please resolve all inconsistencies and re-submit OP-SUMR and OP-PBRSUP tables.
- 2) OP-REQ1 form, page 87, change issuance date for NSR 96510 from 7/24/2023 to 8/9/2024 (per project

362638). Please submit revised OP-REQ1 page.

3) Are FUGITIVES unit listed on UA12 form different than FUGITIVES units listed in OP-PBRSUP and authorized under PBR 147877 and 172343?

4) Please submit an OP-SUMR form to document ALL units listed in Tables A, B and D of OP-PBRSUP that are not currently listed in the SOP renewal application (a list of units and their NSR/PBR authorization included in a draft version of the WDP is attached). For example, PLTMSS, PLTRPL, PLTREF, CTLLOADING, FOAMTK, C3111SCRUB, etc. appear to be missing from the attached Excel file. If these units have other state or federal applicable requirements, please submit applicable OP-UA forms. For units that are listed on the attached spread sheet and in the OP-PBRSUP form, e.g., FUGITIVES, EMGEN, please confirm all NSR/PBR authorizations are correctly listed.

5) For FUGITIVES unit, OP-UA1, subject to MON requirements under MACT FFFF please make sure you have submitted the following forms (as applicable) to determine MACT FFFF requirements: UA60, UA58, UA52, UA45, UA15, UA14, UA13,

6) GRPTKGTABS will be deleted since it has only 1 unit T-912, UA3. To restore the group, you will need to include at least 2 units.

7) Periodic Monitoring (PM) is required for DEGREASE unit subject to 30 TAC Ch 115. Please submit OP-MON form to demonstrate compliance with Ch 115.412(1) main standard.

8) FL-051 unit, UA7, pages 5 and 6, HRVOC Vent Gas, NO codes for alternative monitoring approach and Modifications to Testing/Monitoring are interpreted as OTHER, NONE code respectively. Please confirm.

Contact me if you have any questions. Appreciate your itemized response by Monday, November 4, 2024, or earlier.

Thank you for your cooperation.

Sincerely,
Vasant

From: Reza, Jennifer <Jennifer.Reza@kuraray.com>

Sent: Tuesday, October 15, 2024 3:08 PM

To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Cc: Megan Yao <myao@spiritenv.com>; Hervey, Carolyn <Carolyn.Hervey@kuraray.com>

Subject: Re: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Vasant,

The records that I thought I owed you had actually already been submitted. I see that Megan has already reached out to you for an update so we will wait to hear back from you as to what information you still need.

Additionally, Carolyn Hervey will be the primary contact for Kuraray moving forward. I am including her on this email.

Thank you,

Jenn Reza

Office: 281-549-9479

Mobile: 281-786-7155

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From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Sent: Tuesday, October 15, 2024 2:57 PM
To: Reza, Jennifer <Jennifer.Reza@kuraray.com>
Cc: Megan Yao <myao@spiritenv.com>
Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Jenn,
Thx for your email. Re: submittal of records – I have noted that you are planning to submit them soon. No problem. As mentioned in my email, if we need to talk, we should do so via a Teams call/meeting.
Vasant

From: Reza, Jennifer <Jennifer.Reza@kuraray.com>
Sent: Tuesday, October 15, 2024 2:51 PM
To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Cc: Megan Yao <myao@spiritenv.com>
Subject: Re: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Vasant,

I was the one calling. I wanted to touch base with you. I have moved out of our environmental department and am realizing that I forgot to follow up on this project. I believe that you are still waiting on submittal of some records. I think at the time my attention was split between several things and I thought the submittal was in the FTPS not STEERS. I am working with the DAR to get the documents officially submitted right now.

I appreciate your patience.

Thank you,

Jenn Reza

Office: 281-549-9479
Mobile: 281-786-7155

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From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Sent: Tuesday, October 15, 2024 2:46 PM
To: Megan Yao <myao@spiritenv.com>
Cc: Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Megan,
I got a call from Kuraray (Ph 281-786-7155) a few minutes ago but I could not connect with the caller. Do you

know who may be calling? It would be best to talk via a Teams call.
Thanks,
Vasant

From: Megan Yao <myao@spiritenv.com>
Sent: Tuesday, October 8, 2024 2:03 PM
To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Mr. Chaphekar,

Thank you for your response!

Megan Yao

Associate Project Manager
DIRECT 281-664-2837 | **MOBILE** 832-603-7982
myao@spiritenv.com



From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Sent: Tuesday, October 8, 2024 1:20 PM
To: Megan Yao <myao@spiritenv.com>
Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Megan,
Thx for your email. Project status – working on resolving errors in the application to generate a working draft permit (WDP). As an example, FL-051 unit, UA7, pages 5 and 6, HRVOC Vent Gas, NO codes for alternative monitoring approach and Modifications to Testing/Monitoring appear to be invalid. Next step - I will send you a complete list of missing (or incorrect) codes, or other info required to generate the WDP.
Vasant

From: Megan Yao <myao@spiritenv.com>
Sent: Tuesday, October 8, 2024 10:50 AM
To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Good morning Mr. Chaphekar,
Could you please give us an update on the status of O3759 renewal (Project No. 35475)? Thank you,

Megan Yao

Associate Project Manager
DIRECT 281-664-2837 | **MOBILE** 832-603-7982
myao@spiritenv.com



From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Sent: Thursday, April 25, 2024 10:54 AM
To: Megan Yao <myao@spiritenv.com>

Cc: Reza, Jennifer <Jennifer.Reza@kuraray.com>; Robert Osborn <rosborn@spiritenv.com>
Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Rec'd. Thx.

From: Megan Yao <myao@spiritenv.com>
Sent: Wednesday, April 24, 2024 8:21 PM
To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Cc: Reza, Jennifer <Jennifer.Reza@kuraray.com>; Robert Osborn <rosborn@spiritenv.com>
Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Mr. Chaphekar, Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Please see the responses in bold embedded in the email below and the updated forms. Thank you,
Megan

From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Sent: Thursday, April 18, 2024 11:19 AM
To: Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Correction
PBR's 106.433, 106.452 are listed in *current permit* but not in OP-PBRSUP. Please revise applicable forms to maintain consistency.

From: Vasant Chaphekar
Sent: Thursday, April 18, 2024 11:18 AM
To: 'Jennifer.reza@kuraray.com' <Jennifer.reza@kuraray.com>
Subject: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Good morning Ms. Reza,

Above referenced project has been reassigned to me. Going forward, I will be processing your application for renewal of your Title V permit (O3759/Project 35475 Kuraray America, Inc./PVOH Plant). Please address all correspondence pertaining to this permit application, including e-mails and updates, to me at the address below, and use the Permit Project reference numbers shown above in the subject line to facilitate tracking. Recommend that all parties on this distribution list use (reply to) the same 'thread' of e-mail rather than create a new one so that at the end of the project we have a complete documentation of all project related e-mails. Any project related email communication sent to me without the subject header "O3759/Project 35475 Kuraray America, Inc./PVOH Plant" may result in delays.

To facilitate timely communication, I would appreciate if you would acknowledge receipt of all e-mail's, especially if any action is required. If additional or missing information is required, you will typically be requested to submit it by a 'due date' (that is determined by me based on the amount and complexity of info requested, time allocated to complete this project, and my project loading). If you have any questions or concerns regarding the due date, please contact me asap.

As an initial request, please submit the following info as soon as practical:

1. In OP-REQ1, NSR permit 95610 issuance date is shown as 09/17/2012 which appears to be incorrect. Should be 09/15/2022?

Kuraray's response: Please see attached updated OP-REQ1 Page 87 with the updated issuance date for NSR 96510. The NSR renewal and amendment application was completed 7/24/2023 (Project #347692).

2. Current FOP includes a compliance schedule. Please confirm this schedule is no longer required based on OP-ACPS form. Correct?

Kuraray's response: The current Title V permit is effective June 2022 and does not contain a compliance schedule. These schedules were removed during the 2022 significant revision (Project # 32814).

3. PBR's 106.433, 106.452 are listed in OP-REQ1 but not in OP-PBRSUP. Please revise applicable forms to maintain consistency.

Kuraray's response: Kuraray requests to remove PBR 106.433 from the permit because the site does not have a surface coating facility. Please see attached updated OP-REQ1 Page 88, updated OP-PBRSUP, and OP-SUMR associated with PBR 106.452.

Please be advised that all federal operating permit (Title V) correspondence from TCEQ, including final actions, for this project will be sent via e-mail.

If you have any questions or concerns on any of these items or think you need to do any additional updates, let me know and we can discuss further.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1. This form will be requested at a later date.

If you choose to submit your application updates through STEERS, please notify me when these updates have been submitted.

I plan to conduct an in-depth technical review of your application and may contact you again to request additional information. Please contact me if you have any questions regarding the project schedule, or any other details regarding your application or permit. I look forward to working with you on this project.

Sincerely,

Vasant Chaphekar, P.E.

Technical Specialist, Air Permits Division
Texas Commission on Environmental Quality
P.O. Box 13087, MC 163
Austin, TX 78711
Ph: (512) 239-1341
Fax: (512) 239-1400
Vasant.Chaphekar@tceq.texas.gov
[Take our customer satisfaction survey at www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

From: [Hervey, Carolyn](#)
To: [Vasant Chaphekar](#)
Cc: [Megan Yao](#); [Reza, Jennifer](#)
Subject: Re: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant
Date: Wednesday, December 4, 2024 11:35:36 AM
Attachments: [image001.png](#)
[image.png](#)
[OP-MON_Rev \(Rev. 12-3-2024\).pdf](#)

Good Morning Mr. Vasant!

Per your e-mail inquiry received yesterday, (12/3/2024), Kuraray America Inc. (Kuraray) provides the following responses:

1. Item 1- Please confirm if ABRASIVE unit is authorized only under NSR 96510 or only under PBR 106.454 or under both. Suggest you submit a revised OP-SUMR to document the NSR/PBR authorizations.

Kuraray's Response: ABRASIVE unit was only authorized under PBR 106.452. The facility does not have blasting activities onsite; therefore, Kuraray is requesting not to include ABRASIVE unit in the SOP and to remove PBR 106.452 from the SOP. This was reflected in the OP-REQ1 submitted on 11/5/2024. Additionally, the OP-SUMR submitted on 4/24/2024 for ABRASIVE unit needs to be removed.

2. Item 7- OP-MON (submitted as an attachment to your email dated 11/05/2024) appears to include PMG-LF-V-052 as a standard PM option which is not supported by TCEQ. Please refer to periodicmon.pdf for list of valid PM options for monitoring VOCs which is the pollutant being monitored under Ch 115.412(1) main standard. Please re-submit OP-MON form.

Kuraray's Response: The PM option is PM-V-052. Please see the attached updated OP-MON.

Please confirm your receipt of this e-mail response. Feel free to contact me if you have any additional questions and/or need more information. Thank you!

Regards,
Carolyn Hervey



HSES Environmental Air Specialist
Kuraray America Inc.
12342 Strang Road
LaPorte, Texas 77571
Office: (832) 568-8328

CONFIDENTIALITY NOTICE: This communication may contain proprietary, confidential

and/or privileged information. It is for the sole use of the intended recipient(s) and any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this communication in error, please notify the sender and promptly delete this communication from your system, including any attachments and copies. Unless explicitly stated to the contrary, this e-mail does not constitute an offer or an acceptance of an offer, or a consent to the use of any contact information for direct marketing purposes or transfer of data to third parties.

From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Sent: Tuesday, December 3, 2024 9:36 AM
To: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>
Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Carolyn,

Re: item 7 perhaps you intended to list PM-V-052 as the standard PM option on the OP-MON form (instead of PMG-LF-V-052). Please confirm.

Thanks,

Vasant

From: Vasant Chaphekar
Sent: Tuesday, December 3, 2024 9:31 AM
To: 'Hervey, Carolyn' <Carolyn.Hervey@kuraray.com>
Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Carolyn,

Below are follow up questions (in blue) to your responses on items 1 and 7. Appreciate your response by close of business on Friday, 12/6/2024.

Thanks,

Vasant

From: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>
Sent: Tuesday, November 5, 2024 11:22 AM
To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: Re: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Good Morning Mr. Vasant!

My apologies you did not receive this information yesterday. It was sent; however, I am currently traveling for work and do not have stable network connections, so there is a delay in my e-mails being sent. So, I'm resending to ensure your receipt.

Thank you!

Regards,

Carolyn Hervey

kuraray

HSES Environmental Air Specialist

Kuraray America Inc.

12342 Strang Road

LaPorte, Texas 77571

Office: (832) 568-8328

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Good Morning Mr. Vasant!

Per your e-mail request received on October 23rd, 2024, Kuraray America Inc. (Kuraray) provides the following responses to your inquiries:

1) ABRASIVE unit appears to have multiple/inconsistent authorizations: OP-2 Table 2, rev 1 shows it is authorized under NSR 96510, OP-SUMR Table 1 dated 4/24/24 shows authorization only under PBR 106.454, and OP-PBRSUP Table B dated 4/24/24, page 2, ABRASIVE unit is authorized under PBR 106.452 09/04/2000. Please resolve all inconsistencies and re-submit OP-SUMR and OP-PBRSUP tables.

Kuraray's Response: The facility does not have blasting activities onsite. Kuraray requests to remove PBR 106.452/09/04/2000 from O3759. Please see the updated OP-PBRSUP Table B and updated Page 88 of OP-REQ1 in the attachment.

Question: Please confirm if ABRASIVE unit is authorized only under NSR 96510 or only under PBR 106.454 or under both. Suggest you submit a revised OP-SUMR to document the NSR/PBR authorizations.

2) OP-REQ1 form, page 87, change issuance date for NSR 96510 from 7/24/2023 to 8/9/2024 (per project 362638). Please submit revised OP-REQ1 page.

Kuraray's Response: Please see the updated OP-REQ1 Page 87 in the

attachment.

3) Are FUGITIVES unit listed on UA12 form different than FUGITIVES units listed in OP-PBRSUP and authorized under PBR 147877 and 172343?

Kuraray's Response: FUGITIVES on OP-UA12 is the same unit as the one listed on OP-PBRSUP. PBR 147877 authorizes the fugitive components associated with the third dryer added to the site and is incorporated into NSR 95610 by reference. PBR 172343 authorizes annual fugitive changes and will be incorporated into NSR 96510 at the next amendment or renewal.

4) Please submit an OP-SUMR form to document ALL units listed in Tables A, B and D of OP-PBRSUP that are not currently listed in the SOP renewal application (a list of units and their NSR/PBR authorization included in a draft version of the WDP is attached). For example, PLTMSS, PLTRPL, PLTREF, CTLLOADING, FOAMTK, C3111SCRUB, etc. appear to be missing from the attached Excel file. If these units have other state or federal applicable requirements, please submit applicable OP-UA forms. For units that are listed on the attached spread sheet and in the OP-PBRSUP form, e.g., FUGITIVES, EMGEN, please confirm all NSR/PBR authorizations are correctly listed.

Kuraray's Response: Please see attached OP-SUMR and OP-PBRSUP. Items 1 to 3 on OP-2 address the applicability for these units.

5) For FUGITIVES unit, OP-UA1, subject to MON requirements under MACT FFFF please make sure you have submitted the following forms (as applicable) to determine MACT FFFF requirements: UA60, UA58, UA52, UA45, UA15, UA14, UA13.

Kuraray's Response: Kuraray has submitted applicable forms OP-UA3, OP-UA4, OP-UA13, OP-UA15, and OP-UA60 with the renewal application dated Aug 4, 2023. All MACT FFFF applicability has been represented in the permit and any subsequent application submittals.

6) GRPTKG1ABS will be deleted since it has only 1 unit T-912, UA3. To restore the group, you will need to include at least 2 units.

Kuraray's Response: Kuraray agrees to remove the group ID GRPTKG1ABS from the permit.

7) Periodic Monitoring (PM) is required for DEGREASE unit subject to 30 TAC Ch 115. Please submit OP-MON form to demonstrate compliance with Ch 115.412(1) main standard.

Kuraray's Response: Kuraray is submitting the updated OP-UA16 and OP-MON in the attachment.

Question: OP-MON (submitted as an attachment to your email dated 11/05/2024) appears to include PMG-LF-V-052 as a standard PM option which is not supported by TCEQ. Please refer to [periodicmon.pdf](#) for list of valid PM options for monitoring VOCs which is the pollutant being monitored under Ch 115.412(1) main standard. Please re-submit OP-MON form.

8) FL-051 unit, UA7, pages 5 and 6, HRVOC Vent Gas, NO codes for alternative monitoring approach and Modifications to Testing/Monitoring are interpreted as OTHER, NONE code respectively. Please confirm.

Kuraray's Response: Please see attached OP-UA7 – Updated Page 5.

Please confirm your receipt of this e-mail response. Feel free to contact me if you have any additional questions and/or need more information. Thank you!

Regards,

Carolyn Hervey

kuraray

HSES Environmental Air Specialist

Kuraray America Inc.

12342 Strang Road

LaPorte, Texas 77571

Office: (832) 568-8328

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From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Sent: Wednesday, October 23, 2024 3:35 PM

To: Hervey, Carolyn <Carolyn.Hervey@kuraray.com>

Cc: Megan Yao <myao@spiritenv.com>; Reza, Jennifer <Jennifer.Reza@kuraray.com>

Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Carolyn,

I have conducted a technical review of your renewal application for your Title V Permit (O3759/Project 35475 Kuraray America, Inc./PVOH Plant). Please provide the following information required to generate a working draft of the permit (WDP):

1) ABRASIVE unit appears to have multiple/inconsistent authorizations: OP-2 Table 2, rev 1 shows it is authorized under NSR 96510, OP-SUMR Table 1 dated 4/24/24 shows authorization only under PBR 106.454, and OP-PBRSUP Table B dated 4/24/24, page 2, ABRASIVE unit is authorized under PBR 106.452 09/04/2000. Please resolve all inconsistencies and re-submit OP-SUMR and OP-PBRSUP tables.

2) OP-REQ1 form, page 87, change issuance date for NSR 96510 from 7/24/2023 to 8/9/2024 (per project 362638). Please submit revised OP-REQ1 page.

3) Are FUGITIVES unit listed on UA12 form different than FUGITIVES units listed in OP-PBRSUP and authorized under PBR 147877 and 172343?

- 4) Please submit an OP-SUMR form to document ALL units listed in Tables A, B and D of OP-PBRSUP that are not currently listed in the SOP renewal application (a list of units and their NSR/PBR authorization included in a draft version of the WDP is attached). For example, PLTMSS, PLTRPL, PLTREF, CTLLOADING, FOAMTK, C3111SCRUB, etc. appear to be missing from the attached Excel file. If these units have other state or federal applicable requirements, please submit applicable OP-UA forms. For units that are listed on the attached spread sheet and in the OP-PBRSUP form, e.g., FUGITIVES, EMGEN, please confirm all NSR/PBR authorizations are correctly listed.
- 5) For FUGITIVES unit, OP-UA1, subject to MON requirements under MACT FFFF please make sure you have submitted the following forms (as applicable) to determine MACT FFFF requirements: UA60, UA58, UA52, UA45, UA15, UA14, UA13,
- 6) GRPTKGTABS will be deleted since it has only 1 unit T-912, UA3. To restore the group, you will need to include at least 2 units.
- 7) Periodic Monitoring (PM) is required for DEGREASE unit subject to 30 TAC Ch 115. Please submit OP-MON form to demonstrate compliance with Ch 115.412(1) main standard.
- 8) FL-051 unit, UA7, pages 5 and 6, HRVOC Vent Gas, NO codes for alternative monitoring approach and Modifications to Testing/Monitoring are interpreted as OTHER, NONE code respectively. Please confirm.

Contact me if you have any questions. Appreciate your itemized response by Monday, November 4, 2024, or earlier.

Thank you for your cooperation.

Sincerely,
Vasant

From: Reza, Jennifer <Jennifer.Reza@kuraray.com>
Sent: Tuesday, October 15, 2024 3:08 PM
To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Cc: Megan Yao <myao@spiritenv.com>; Hervey, Carolyn <Carolyn.Hervey@kuraray.com>
Subject: Re: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Vasant,

The records that I thought I owed you had actually already been submitted. I see that Megan has already reached out to you for an update so we will wait to hear back from you as to what information you still need.

Additionally, Carolyn Hervey will be the primary contact for Kuraray moving forward. I am including her on this email.

Thank you,

Jenn Reza

Office: 281-549-9479
Mobile: 281-786-7155

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From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Sent: Tuesday, October 15, 2024 2:57 PM

To: Reza, Jennifer <Jennifer.Reza@kuraray.com>

Cc: Megan Yao <myao@spiritenv.com>

Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Jenn,

Thx for your email. Re: submittal of records – I have noted that you are planning to submit them soon. No problem. As mentioned in my email, if we need to talk, we should do so via a Teams call/meeting.

Vasant

From: Reza, Jennifer <Jennifer.Reza@kuraray.com>

Sent: Tuesday, October 15, 2024 2:51 PM

To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>

Cc: Megan Yao <myao@spiritenv.com>

Subject: Re: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Vasant,

I was the one calling. I wanted to touch base with you. I have moved out of our environmental department and am realizing that I forgot to follow up on this project. I believe that you are still waiting on submittal of some records. I think at the time my attention was split between several things and I thought the submittal was in the FTPS not STEERS. I am working with the DAR to get the documents officially submitted right now.

I appreciate your patience.

Thank you,

Jenn Reza

Office: 281-549-9479

Mobile: 281-786-7155

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From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Sent: Tuesday, October 15, 2024 2:46 PM
To: Megan Yao <myao@spiritenv.com>
Cc: Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Megan,
I got a call from Kuraray (Ph 281-786-7155) a few minutes ago but I could not connect with the caller. Do you know who may be calling? It would be best to talk via a Teams call.
Thanks,
Vasant

From: Megan Yao <myao@spiritenv.com>
Sent: Tuesday, October 8, 2024 2:03 PM
To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Mr. Chaphekar,

Thank you for your response!

Megan Yao

Associate Project Manager
DIRECT 281-664-2837 | **MOBILE** 832-603-7982
myao@spiritenv.com



From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Sent: Tuesday, October 8, 2024 1:20 PM
To: Megan Yao <myao@spiritenv.com>
Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Megan,
Thx for your email. Project status – working on resolving errors in the application to generate a working draft permit (WDP). As an example, FL-051 unit, UA7, pages 5 and 6, HRVOC Vent Gas, NO codes for alternative monitoring approach and Modifications to Testing/Monitoring appear to be invalid. Next step - I will send you a complete list of missing (or incorrect) codes, or other info required to generate the WDP.
Vasant

From: Megan Yao <myao@spiritenv.com>
Sent: Tuesday, October 8, 2024 10:50 AM
To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Good morning Mr. Chaphekar,
Could you please give us an update on the status of O3759 renewal (Project No. 35475)?
Thank you,

Megan Yao

Associate Project Manager
DIRECT 281-664-2837 | **MOBILE** 832-603-7982
myao@spiritenv.com



From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Sent: Thursday, April 25, 2024 10:54 AM
To: Megan Yao <myao@spiritenv.com>
Cc: Reza, Jennifer <Jennifer.Reza@kuraray.com>; Robert Osborn <rosborn@spiritenv.com>
Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Rec'd. Thx.

From: Megan Yao <myao@spiritenv.com>
Sent: Wednesday, April 24, 2024 8:21 PM
To: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Cc: Reza, Jennifer <Jennifer.Reza@kuraray.com>; Robert Osborn <rosborn@spiritenv.com>
Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Hi Mr. Chaphekar, Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Please see the responses in bold embedded in the email below and the updated forms. Thank you,
Megan

From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Sent: Thursday, April 18, 2024 11:19 AM
To: Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Correction

PBR's 106.433, 106.452 are listed in *current permit* but not in OP-PBRSUP. Please revise applicable forms to maintain consistency.

From: Vasant Chaphekar

Sent: Thursday, April 18, 2024 11:18 AM

To: 'Jennifer.reza@kuraray.com' <Jennifer.reza@kuraray.com>

Subject: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Good morning Ms. Reza,

Above referenced project has been reassigned to me. Going forward, I will be processing your application for renewal of your Title V permit (O3759/Project 35475 Kuraray America, Inc./PVOH Plant). Please address all correspondence pertaining to this permit application, including e-mails and updates, to me at the address below, and use the Permit Project reference numbers shown above in the subject line to facilitate tracking. Recommend that all parties on this distribution list use (reply to) the same 'thread' of e-mail rather than create a new one so that at the end of the project we have a complete documentation of all project related e-mails. Any project related email communication sent to me without the subject header "O3759/Project 35475 Kuraray America, Inc./PVOH Plant" may result in delays.

To facilitate timely communication, I would appreciate if you would acknowledge receipt of all e-mail's, especially if any action is required. If additional or missing information is required, you will typically be requested to submit it by a 'due date' (that is determined by me based on the amount and complexity of info requested, time allocated to complete this project, and my project loading). If you have any questions or concerns regarding the due date, please contact me asap.

As an initial request, please submit the following info as soon as practical:

1. In OP-REQ1, NSR permit 95610 issuance date is shown as 09/17/2012 which appears to be incorrect. Should be 09/15/2022?

Kuraray's response: Please see attached updated OP-REQ1 Page 87 with the updated issuance date for NSR 96510. The NSR renewal and amendment application was completed 7/24/2023 (Project #347692).

2. Current FOP includes a compliance schedule. Please confirm this schedule is no longer required based on OP-ACPS form. Correct?

Kuraray's response: The current Title V permit is effective June 2022 and does not contain a compliance schedule. These schedules were removed during the 2022 significant revision (Project # 32814).

3. PBR's 106.433, 106.452 are listed in OP-REQ1 but not in OP-PBR SUP. Please revise applicable forms to maintain consistency.

Kuraray's response: Kuraray requests to remove PBR 106.433 from the permit because the site does not have a surface coating facility. Please see attached updated OP-REQ1 Page 88, updated OP-PBR SUP, and OP-SUMR associated with PBR 106.452.

Please be advised that all federal operating permit (Title V) correspondence from TCEQ, including final actions, for this project will be sent via e-mail.

If you have any questions or concerns on any of these items or think you need to do any additional updates, let me know and we can discuss further.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1. This form will be requested at a later date.

If you choose to submit your application updates through STEERS, please notify me when these updates have been submitted.

I plan to conduct an in-depth technical review of your application and may contact you again to request additional information. Please contact me if you have any questions regarding the project schedule, or any other details regarding your application or permit. I look forward to working with you on this project.

Sincerely,

Vasant Chaphekar, P.E.

Technical Specialist, Air Permits Division

Texas Commission on Environmental Quality

P.O. Box 13087, MC 163

Austin, TX 78711

Ph: (512) 239-1341

Fax: (512) 239-1400

Vasant.Chaphekar@tceq.texas.gov

Take our customer satisfaction survey at www.tceq.texas.gov/customersurvey

**Texas Commission on Environmental Quality
Monitoring Requirements
Form OP-MON (Page 1)
Federal Operating Permit Program
Table 1a: CAM/PM Additions**

I. Identifying Information		
Account No.:	RN No.: RN106155849	CN: CN603315953
Permit No: O3759		Project No.: 35475
Area Name: PVA Plant		
Company Name: Kuraray America, Inc.		
II. Unit/Emission Point/Group/Process Information		
Revision No.:		
Unit/EPN/Group/Process ID No.: DEGREASE		
Applicable Form: OP-UA16		
III. Applicable Regulatory Requirement		
Name: 30 TAC Chapter 115, Subchapter E		
SOP/GOP Index No.: R5412-1		
Pollutant: VOC		
Main Standard: §115.412(a)(1)		
IV. Title V Monitoring Information		
Monitoring Type: PM		
Unit Size:		
CAM/PM Option No.: PM-V-052		
Deviation Limit:		
CAM/PM Option No.:		
Deviation Limit: Monitoring data which indicates the cold cleaner is not in compliance with the application requirements of 30 TAC §115.412(a)(1)(A) – (F).		
V. Control Device Information		
Control Device ID No.: N/A		
Control Device Type: N/A		

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 2
Texas Commission on Environmental Quality**

Date: 11/04/2024
Permit No.: O3759
Regulated Entity No.: RN106155849
Company Name: Kuraray America, Inc.

Using the table below, provide a description of the revision.

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
1	MS-A	YES	C3111SCRUB PLTMSS PLTRPL PLTREF	OP-SUMR	106.262/11/01/2003[147877] 106.263/11/01/2001 106 .264/09/04/2000 106.373/09/04/2000	Kuraray is resubmitting the OP-SUMR form to for the listed sources. These sources do not have unit specific applicable requirements.
2	SIG-A	YES	CLLOADING DIESELULD	OP-REQ2 OP-UA4	106.472/09/04/2000 106.473/09/04/2000	Kuraray is resubmitting the OP-SUMR form for the loading & unloading sources. Kuraray is also submitting OP-REQ2 to add permit shield of Ch. 115 Subchapter C of CLLOADING, and submitting OP-UA4 for DIESELDD .
3	SIG-A	YES	FOAMTK V-021 V-022 V-023 V-024 EPN12TK EPN13TK PORTTK	OP-REQ2	96510	Kuraray is resubmitting the OP-SUMR form for the storage tanks. Kuraray is also submitting OP-REQ2 to add permit shield of Ch. 115 Subchapter B for the listed tanks.
4	SIG-A	NO	DEGREASE	OP-UA16	106.454/11/01/2001	Kuraray is submitting updated OP-UA16 and OP-MON.
5	MS-A	YES	MULTIPLE	OP-PBRSUP	PBRs	Kuraray is resubmitting OP-PBRSUP Table B.

Texas Commission on Environmental Quality
Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1
Federal Operating Permit Program

(a) Form OP-REQ1: Page 87			
XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)			
E. PSD Permits and PSD Major Pollutants			
PSD Permit No.:	Issuance Date:	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
If PSD Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html .			
F. Nonattainment (NA) Permits and NA Major Pollutants			
NA Permit No.:	Issuance Date:	Pollutant(s):	
NA Permit No.:	Issuance Date:	Pollutant(s):	
NA Permit No.:	Issuance Date:	Pollutant(s):	
NA Permit No.:	Issuance Date:	Pollutant(s):	
If NA Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html .			
G. NSR Authorizations with FCAA § 112(g) Requirements			
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
H. Title 30 TAC Chapter 116 Permits, Special Permits, Standard Permits, Other Authorizations (Other Than Permits By Rule, PSD Permits, NA Permits) for the Application Area			
Authorization No.: 95610	Issuance Date: 08/09/2024	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:

Texas Commission on Environmental Quality
Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1
Federal Operating Permit Program

(b) Form OP-REQ1: Page 88	
XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)	
I. Permits by Rule (30 TAC Chapter 106) for the Application Area	
<i>A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.</i>	
PBR No.: 106.261	Version No./Date: 11/1/2003
PBR No.: 106.262	Version No./Date: 11/1/2003
PBR No.: 106.263	Version No./Date: 11/1/2001
PBR No.: 106.264	Version No./Date: 9/4/2000
PBR No.: 106.373	Version No./Date: 9/4/2000
PBR No.: 106.454	Version No./Date: 11/1/2001
PBR No.: 106.472	Version No./Date: 9/4/2000
PBR No.: 106.473	Version No./Date: 9/4/2000
PBR No.: 106.476	Version No./Date: 9/4/2000
PBR No.: 106.478	Version No./Date: 9/4/2000
PBR No.: 106.511	Version No./Date: 9/4/2000
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
J. Municipal Solid Waste and Industrial Hazardous Waste Permits With an Air Addendum	
Permit No.:	Issuance Date:
Permit No.:	Issuance Date:
Permit No.:	Issuance Date:
Permit No.:	Issuance Date:

Form OP-REQ2
Negative Applicable/Superseded Requirement Determinations
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
11/04/2024	O3759	RN106155849

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
A	2	CLLOADING	OP-PBRSUP	30 TAC Ch. 115 Subchapter C	115.10	The loading operation does not involve VOCs.
A	3	FOAMTK	OP-PBRSUP	30 TAC Ch. 115 Subchapter C	115.110(a)	Storage tank does not storage volatile organic compounds.
A	3	FOAMTK	OP-PBRSUP	NSPS Kb	60.110b(a)	Storage tank does not store volatile organic liquids.
A	3	V-021	OP-PBRSUP	30 TAC Ch. 115 Subchapter C	115.111(a)(8)	Storage tank has a capacity of less than 1,000 gallons.
A	3	V-021	OP-PBRSUP	NSPS Kb	60.110b(a)	Storage tank has a capacity of less than 19,800 gallons.
A	3	V-022	OP-PBRSUP	30 TAC Ch. 115 Subchapter C	115.111(a)(8)	Storage tank has a capacity of less than 1,000 gallons.
A	3	V-022	OP-PBRSUP	NSPS Kb	60.110b(a)	Storage tank has a capacity of less than 19,800 gallons.
A	3	V-023	OP-PBRSUP	30 TAC Ch. 115 Subchapter C	115.111(a)(8)	Storage tank has a capacity of less than 1,000 gallons.
A	3	V-023	OP-PBRSUP	NSPS Kb	60.110b(a)	Storage tank has a capacity of less than 19,800 gallons.
A	3	V-024	OP-PBRSUP	30 TAC Ch. 115 Subchapter C	115.111(a)(8)	Storage tank has a capacity of less than 1,000 gallons.
A	3	V-024	OP-PBRSUP	NSPS Kb	60.110b(a)	Storage tank has a capacity of less than 19,800 gallons.

Form OP-REQ2
Negative Applicable/Superseded Requirement Determinations
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
11/04/2024	O3759	RN106155849

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
A	3	EPN12TK	OP-PBRSUP	30 TAC Ch. 115 Subchapter C	115.111(a)(8)	Storage tank has a capacity of less than 1,000 gallons.
A	3	EPN12TK	OP-PBRSUP	NSPS Kb	60.110b(a)	Storage tank has a capacity of less than 19,800 gallons.
A	3	EPN13TK	OP-PBRSUP	30 TAC Ch. 115 Subchapter C	115.111(a)(8)	Storage tank has a capacity of less than 1,000 gallons.
A	3	EPN13TK	OP-PBRSUP	NSPS Kb	60.110b(a)	Storage tank has a capacity of less than 19,800 gallons.
A	3	PORTTK	OP-PBRSUP	30 TAC Ch. 115 Subchapter C	115.111(a)(8)	Storage tank has a capacity of less than 1,000 gallons.
A	3	PORTTK	OP-PBRSUP	NSPS Kb	60.110b(a)	Storage tank has a capacity of less than 19,800 gallons.

**Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR**

Table 1

Date	Permit No.	Regulated Entity No.
11/04/2024	O3759	RN106155849

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description147877	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
		C3111HDR	OP-UA15	Scrubber C311-1 Vent Header		96510 106.262/11/01/2003	
		FUGITIVES	OP-UA12	PVOH Fugitives		96510 106.262/11/01/2003 [147877] 106.261/11/01/2003 106.262/11/01/2003 [172343]	
		EMGEN	OP-UA2	Emergency Generator		96510 106.511/09/04/2000	
		DEGREASE	OP-UA16	Degreasing Unit		106.454/11/01/2001	
A	1	C3111SCRUB	OP-PBR SUP	Scrubber C311-1 Vent Header		106.262/11/01/2003[147877]	
A	1	PLTMSS	OP-PBR SUP	Plant MSS		106.263/11/01/2001	
A	1	PLTRPL	OP-PBR SUP	Replacement of Facility		106.264/09/04/2000	
A	1	PLTREF	OP-PBR SUP	Catalyst Refrigeration		106.373/09/04/2000	
A	2	CLLOADING	OP-PBR SUP	Inorganics Loading		106.472/09/04/2000	
A	2	DIESELULD	OP-PBR SUP	Diesel Unloading		106.473/09/04/2000	

**Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR**

Table 1

Date	Permit No.	Regulated Entity No.
11/04/2024	O3759	RN106155849

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description147877	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
A	3	FOAMTK	OP-REQ2	Firefighting Foam Tank		106.476/09/04/2000	
A	3	V-021	OP-REQ2	Phosphate Tank		106.478/09/04/2000	
A	3	V-022	OP-REQ2	Dispersant Tank		106.478/09/04/2000	
A	3	V-023	OP-REQ2	Sodium Hypochlorite Tank		106.478/09/04/2000	
A	3	V-024	OP-REQ2	Sulfuric Acid Tank		106.478/09/04/2000	
A	3	EPN12TK	OP-REQ2	Diesel Tank for Emergency Generator EPN12		106.478/09/04/2000	
A	3	EPN13TK	OP-REQ2	Diesel Tank for Emergency Generator EPN13		106.478/09/04/2000	
A	3	PORTTK	OP-REQ2	Portable Diesel Tank		106.478/09/04/2000	

Loading/Unloading Operations Attributes

Form OP-UA4 (Page 1)

Federal Operating Permit Program

Table 1a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)

Subchapter C: Loading and Unloading of Volatile Organic Compounds

Texas Commission on Environmental Quality

Date	Permit No.:	Regulated Entity No.
11/04/2024	O3759	RN106155849

Unit ID No.	SOP/GOP Index No.	Chapter 115 Facility Type	Alternate Control Requirement (ACR)	ACR ID No.	Product Transferred	Transfer Type	True Vapor Pressure	Daily Throughput	Control Options
DIESELULD	R5212-3	OTHER	NONE		VOC1	UNLOAD	0.5-		

Texas Commission on Environmental Quality
Flare Attributes
Form OP-UA7 (Page 5)
Federal Operating Permit Program
Table 5a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter H, Division 1: Highly-Reactive Volatile Organic Compounds-Vent Gas Control

Date	Permit No.:	Regulated Entity No.
11/04/2024	O3759	RN106155849

Unit ID No.	SOP Index No.	Out of Service	Total Gas Stream	Gas Stream Concentration	Exempt Date	Alternative Monitoring Approach	Modifications to Testing/Monitoring	Modifications to Testing/Monitoring ID No.	Flare Type
FL-051	R5722-1	NO	YES	YES		<i>OTHER</i>	<i>NONE</i>		MULTI

Solvent Degreasing Machine Attributes
Form OP-UA16 (Page 1) Federal Operating Permit Program
Table 1: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115) Subchapter E: Solvent Using Processes
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
11/04/2024	O3759	RN106155849

Unit ID No.	SOP/GOP Index No.	Solvent Degreasing Machine Type	Alternate Control Requirement (ACR)	Alternate Control Requirement ID No.	Solvent Sprayed	Solvent Vapor Pressure	Solvent Heated	Parts Larger Than Drainage	Drainage Area	Disposal in Enclosed Containers	Solvent/Air Interface Area	Emission Control Combinations
DEGREASE	R5115-1	COLD	NO		<i>NO</i>	0.6-	NO	NO	16-	YES		

Permit By Rule Supplemental Table (Page 2)

Table B: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for the Application Area

Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
11/04/2023	O3759	RN106155849

Unit ID No.	PBR No.	Version No./Date
PLTMSS	106.263	11/1/2001
PLTRPL	106.264	09/04/2000
PLTREF	106.373	09/04/2000
DEGREASE	106.454	11/01/2001
CLLOADING	106.472	09/04/2000
DIESELULD	106.473	09/04/2000
FOAMTK	106.476	09/04/2000
V-021	106.478	09/04/2000
V-022	106.478	09/04/2000
V-023	106.478	09/04/2000
V-024	106.478	09/04/2000
EPN12TK	106.478	09/04/2000
EPN13TK	106.478	09/04/2000
PORTTK	106.478	09/04/2000
EMGEN	106.511	09/04/2000

Texas Commission on Environmental Quality
Monitoring Requirements
Form OP-MON (Page 1)
Federal Operating Permit Program
Table 1a: CAM/PM Additions

I. Identifying Information		
Account No.:	RN No.: RN106155849	CN: CN603315953
Permit No: O3759		Project No.: 35475
Area Name: PVA Plant		
Company Name: Kuraray America, Inc.		
II. Unit/Emission Point/Group/Process Information		
Revision No.:		
Unit/EPN/Group/Process ID No.: DEGREASE		
Applicable Form: OP-UA16		
III. Applicable Regulatory Requirement		
Name: 30 TAC Chapter 115, Subchapter E		
SOP/GOP Index No.: R5412-1		
Pollutant: VOC		
Main Standard: §115.412(a)(1)		
IV. Title V Monitoring Information		
Monitoring Type: PM		
Unit Size:		
CAM/PM Option No.: PMG-LF-V-052		
Deviation Limit:		
CAM/PM Option No.:		
Deviation Limit: Monitoring data which indicates the cold cleaner is not in compliance with the application requirements of 30 TAC §115.412(a)(1)(A) – (F).		
V. Control Device Information		
Control Device ID No.: N/A		
Control Device Type: N/A		

From: [Megan Yao](#)
To: [Vasant Chaphekar](#)
Cc: [Reza, Jennifer](#); [Robert Osborn](#)
Subject: RE: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant
Date: Wednesday, April 24, 2024 8:21:42 PM
Attachments: [O3759\(Project 35475\) Updated Forms 4.24.2024.pdf](#)

Hi Mr. Chaphekar,

Please see the responses in bold embedded in the email below and the updated forms. Thank you,

Megan

From: Vasant Chaphekar <vasant.chaphekar@tceq.texas.gov>
Sent: Thursday, April 18, 2024 11:19 AM
To: Reza, Jennifer <Jennifer.Reza@kuraray.com>
Subject: [External]RE: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Correction

PBR's 106.433, 106.452 are listed in *current permit* but not in OP-PBRSUP. Please revise applicable forms to maintain consistency.

From: Vasant Chaphekar
Sent: Thursday, April 18, 2024 11:18 AM
To: 'Jennifer.reza@kuraray.com' <Jennifer.reza@kuraray.com>
Subject: Project status -- O3759/Project 35475 Kuraray America, Inc./PVOH Plant

Good morning Ms. Reza,

Above referenced project has been reassigned to me. Going forward, I will be processing your application for renewal of your Title V permit (O3759/Project 35475 Kuraray America, Inc./PVOH Plant). Please address all correspondence pertaining to this permit application, including e-mails and updates, to me at the address below, and use the Permit Project reference numbers shown above in the subject line to facilitate tracking. Recommend that all parties on this distribution list use (reply to) the same 'thread' of e-mail rather than create a new one so that at the end of the project we have a complete documentation of all project related e-mails. Any project related email communication sent to me without the subject header "O3759/Project 35475 Kuraray America, Inc./PVOH Plant" may result in delays.

To facilitate timely communication, I would appreciate if you would acknowledge receipt of all e-mail's, especially if any action is required. If additional or missing information is required, you will typically be requested to submit it by a 'due date' (that is determined by me based on the amount and complexity of info requested, time allocated to complete this project, and my project loading). If you have any questions or concerns regarding the due date, please contact me asap.

As an initial request, please submit the following info as soon as practical:

1. In OP-REQ1, NSR permit 95610 issuance date is shown as 09/17/2012 which appears to be incorrect. Should be 09/15/2022?

Kuraray's response: Please see attached updated OP-REQ1 Page 87 with the updated issuance date for NSR 96510. The NSR renewal and amendment application was completed 7/24/2023 (Project #347692).

2. Current FOP includes a compliance schedule. Please confirm this schedule is no longer required based on OP-ACPS form. Correct?

Kuraray's response: The current Title V permit is effective June 2022 and does not contain a compliance schedule. These schedules were removed during the 2022 significant revision (Project # 32814).

3. PBR's 106.433, 106.452 are listed in OP-REQ1 but not in OP-PBRSUP. Please revise applicable forms to maintain consistency.

Kuraray's response: Kuraray requests to remove PBR 106.433 from the permit because the site does not have a surface coating facility. Please see attached updated OP-REQ1 Page 88, updated OP-PBRSUP, and OP-SUMR associated with PBR 106.452.

Please be advised that all federal operating permit (Title V) correspondence from TCEQ, including final actions, for this project will be sent via e-mail.

If you have any questions or concerns on any of these items or think you need to do any additional updates, let me know and we can discuss further.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1. This form will be requested at a later date.

If you choose to submit your application updates through STEERS, please notify me when these updates have been submitted.

I plan to conduct an in-depth technical review of your application and may contact you again to request additional information. Please contact me if you have any questions regarding the project schedule, or any other details regarding your application or permit. I look forward to working with you on this project.

Sincerely,
Vasant Chaphekar, P.E.
Technical Specialist, Air Permits Division

Texas Commission on Environmental Quality

P.O. Box 13087, MC 163

Austin, TX 78711

Ph: (512) 239-1341

Fax: (512) 239-1400

Vasant.Chaphekar@tceq.texas.gov

Take our customer satisfaction survey at www.tceq.texas.gov/customersurvey

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 2
Texas Commission on Environmental Quality**

Date: 04/24/2024
Permit No.: 03759
Regulated Entity No.: RN106155849
Company Name: Kuraray America, Inc.

Using the table below, provide a description of the revision.

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
1	MS-A	NO	ABRASIVE	OP-SUMR	96510	Kuraray is submitting the OP-SUMR form to add the abrasive cleaning source ABRASIVE to the permit.
2	MS-A	NO	Multiple	OP-PBRSUP	Multiple	Kurary is resubmitting the OP-PBRSUP.

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 3
Texas Commission on Environmental Quality**

Date: 04/24/2024	
Permit No.: 03759	
Regulated Entity No.: RN106155849	
Company Name: Kuraray America, Inc.	
I. Significant Revision <i>(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)</i>	
A. Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
B. Indicate the alternate language(s) in which public notice is required: Spanish	
C. Will, there be a change in air pollutant emissions as a result of the significant revision?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

Texas Commission on Environmental Quality
Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1
Federal Operating Permit Program

(a) Form OP-REQ1: Page 87			
XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)			
E. PSD Permits and PSD Major Pollutants			
PSD Permit No.:	Issuance Date:	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
If PSD Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html .			
F. Nonattainment (NA) Permits and NA Major Pollutants			
NA Permit No.:	Issuance Date:	Pollutant(s):	
NA Permit No.:	Issuance Date:	Pollutant(s):	
NA Permit No.:	Issuance Date:	Pollutant(s):	
NA Permit No.:	Issuance Date:	Pollutant(s):	
If NA Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html .			
G. NSR Authorizations with FCAA § 112(g) Requirements			
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
H. Title 30 TAC Chapter 116 Permits, Special Permits, Standard Permits, Other Authorizations (Other Than Permits By Rule, PSD Permits, NA Permits) for the Application Area			
Authorization No.: 96510	Issuance Date: 07/24/2023	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:

Texas Commission on Environmental Quality
Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1
Federal Operating Permit Program

(b) Form OP-REQ1: Page 88	
XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)	
I. Permits by Rule (30 TAC Chapter 106) for the Application Area	
<i>A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.</i>	
PBR No.: 106.261	Version No./Date: 11/1/2003
PBR No.: 106.262	Version No./Date: 11/1/2003
PBR No.: 106.263	Version No./Date: 11/1/2001
PBR No.: 106.264	Version No./Date: 9/4/2000
PBR No.: 106.373	Version No./Date: 9/4/2000
PBR No.: 106.452	Version No./Date: 9/4/2000
PBR No.: 106.454	Version No./Date: 11/1/2001
PBR No.: 106.472	Version No./Date: 9/4/2000
PBR No.: 106.473	Version No./Date: 9/4/2000
PBR No.: 106.476	Version No./Date: 9/4/2000
PBR No.: 106.478	Version No./Date: 9/4/2000
PBR No.: 106.511	Version No./Date: 9/4/2000
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
J. Municipal Solid Waste and Industrial Hazardous Waste Permits With an Air Addendum	
Permit No.:	Issuance Date:
Permit No.:	Issuance Date:
Permit No.:	Issuance Date:
Permit No.:	Issuance Date:

**Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR**

Table 1

Date	Permit No.	Regulated Entity No.
04/24/2024	O3759	RN106155849

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description147877	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
A	I	ABRASIVE	OP-PBRSUP	Abrasive Cleaning		106.454/11/01/2001	

Permit By Rule Supplemental Table (Page 1)

Table A: Registered Permits by Rule (30 TAC Chapter 106) for the Application Area

Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
04/24/2024	O3759	RN106155849

Unit ID No.	Registration No.	PBR No.	Registration Date
C3111SCRUB	147877	106.262	9/14/2017
FUGITIVES	147877	106.262	9/14/2017
FUGITIVES	172343	106.261 106.262	4/27/2023

Permit By Rule Supplemental Table (Page 2)

Table B: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for the Application Area

Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
04/24/2024	O3759	RN106155849

Unit ID No.	PBR No.	Version No./Date
FUGITIVES	106.261	11/1/2003
FUGITIVES	106.262	11/1/2003
PLTMSS	106.263	11/1/2001
PLTRPL	106.264	09/04/2000
PLTREF	106.373	09/04/2000
DEGREASE	106.454	11/01/2001
CTLOADING	106.472	09/04/2000
DIESELTK	106.473	09/04/2000
FOAMTK	106.476	09/04/2000
V-021	106.478	09/04/2000
V-022	106.478	09/04/2000
V-023	106.478	09/04/2000
V-024	106.478	09/04/2000
EPN12TK	106.478	09/04/2000
EPN13TK	106.478	09/04/2000
PORTTK	106.478	09/04/2000
EMGEN	106.511	09/04/2000
ABRASIVE	106.452	09/04/2000

Permit By Rule Supplemental Table (Page 4)

Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area

Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
04/24/2024	O3759	RN106155849

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
C3111SCRUB	106.262	147877	Monitor the liquid flow rate once per week. The option to monitor the liquid flow rate, liquid supply pressure, and the liquid flow rate and gas flow rate are provided as monitoring options because monitoring these parameters can indicate malfunctions in the liquid pumping equipment, blockage of pipes or spray nozzles. Monitor the outlet water temperature hourly. The scrubbers were designed to operate at a maximum outlet scrubbing liquid temperature of 90°F.
FUGITIVES	106.262 106.262	147877 11/1/2003	Each component in the process unit must be monitored according to the requirements of Subchapter D, Division 3 of Ch. 115. A component is considered repaired: for all other components, when the component is demonstrated to no longer have a leak after adjustments or alterations to the component by the normal monitoring method required under Ch. 115 Subchapter H.
FUGITIVES	106.261 106.262 106.261	172343 11/1/2003	Each component in the process unit must be monitored according to the requirements of Subchapter D, Division 3 of Ch. 115. A component is considered repaired: for all other components, when the component is demonstrated to no longer have a leak after adjustments or alterations to the component by the normal monitoring method required under Ch. 115 Subchapter H.
PLTMSS	106.263	11/1/2001	Keep records of: (1) the type and reason for the activity or facility construction; (2) the processes and equipment involved; (3) the date, time, and duration of the activity or facility operation; and (4) the air contaminants and amounts which are emitted as a result of the activity or facility operation.
PLTRPL	106.264	09/04/2000	There will be no increase in capacity, production rate, or throughput as a result of the replacement.

Permit By Rule Supplemental Table (Page 4)

Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area

Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
04/24/2024	O3759	RN106155849

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
PLTREF	106.373	09/04/2000	Keep all required records at the site to demonstrate compliance.
DEGREASE	106.454	11/01/2001	On a monthly basis, records shall be kept of total solvent makeup (gross usage minus waste disposal).
CTLOADING	106.472	09/04/2000	No visible emissions occur. Keep all required records at the site to demonstrate compliance.
DIESELTK	106.473	09/04/2000	Maintain daily record of the following: The identification number of each tank-truck tank for which annual leak testing is required under §115.214(a)(1)(C) or (b)(1)(C); The quantity of VOC loaded into each transport vessel; The date of the last leak testing of each tank-truck tank as required by §115.214(a)(1)(C) or (b)(1)(C); A record of the type and vapor pressure of each VOC transferred (excluding gasoline).
FOAMTK	106.476	09/04/2000	Continuously monitor one or more operational parameters sufficient to demonstrate proper functioning of the control device to design specifications.
V-021	106.478	09/04/2000	Keep all required records at the site to demonstrate compliance.
V-022	106.478	09/04/2000	Keep all required records at the site to demonstrate compliance.
V-023	106.478	09/04/2000	Keep all required records at the site to demonstrate compliance.
V-024	106.478	09/04/2000	Keep all required records at the site to demonstrate compliance.
EPN12TK	106.478	09/04/2000	Keep all required records at the site to demonstrate compliance.

Permit By Rule Supplemental Table (Page 4)

Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area

Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
04/24/2024	O3759	RN106155849

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
EPN13TK	106.478	09/04/2000	Keep all required records at the site to demonstrate compliance.
PORTTK	106.478	09/04/2000	Keep all required records at the site to demonstrate compliance.
EMGEN	106.511	09/04/2000	Maintain records of annual operating hours of the engine.
ABRASIVE	106.452	09/04/2000	Enclosed abrasive cleaning: no visible fugitive emissions from the facility. Outside blast cleaning: records shall be maintained of perating hours and abrasive material usage.

Carolyn Thomas

From: eNotice TCEQ
Sent: Monday, August 7, 2023 10:22 AM
To: 'mayes.middleton@senate.texas.gov'; 'Dennis.paul@house.texas.gov'
Subject: TCEQ Notice - Permit Number O3759
Attachments: TCEQ Notice - O3759_35475.pdf

This email is being sent to electronically transmit an official document issued by the Office of Air of the Texas Commission on Environmental Quality.

This email is being sent to you because either (a) you filed a document with the Office of the Chief Clerk that made you part of the official mailing list for the above referenced matter, or (b) notice to you is legally required. As authorized by Texas Water Code 5.128, this electronic transmittal is replacing the previous practice of hard copy distribution. Amendments to Texas Government Code 552.137 prompted a change to the agency's privacy policy regarding confidentiality of certain email addresses. The revised privacy policy can be viewed at http://www.tceq.state.tx.us/help/policies/electronic_info_policy.html.

Questions regarding this email may be submitted either by replying directly to this email or by calling Mr. Jesse Chacon, P.E. with the Air Permits Division at (512) 239-5759.

The attached document is provided in an Adobe Acrobat .pdf format. If you cannot display the attachment, you may need to visit the Adobe web site (<http://get.adobe.com/reader>) to download the free Adobe Acrobat Reader software.

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Kelly Keel, *Interim Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 7, 2023

THE HONORABLE MAYES MIDDLETON
TEXAS SENATE
PO BOX 12068
AUSTIN TX 78711-2068

Re: Accepted Federal Operating Permit Renewal Application
Project Number: 35475
Permit Number: O3759
Kuraray America, Inc.
Pvoh Plant
La Porte, Harris County
Regulated Entity Number: RN106155849
Customer Reference Number: CN603315953

Dear Senator Middleton:

This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) renewal application for a site located in your district. As part of this permitting process, the applicant is required to publish a formal newspaper public notice. The notice will inform the public of their right to make comments or request a public hearing. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. <https://gisweb.tceq.texas.gov/LocationMapper/?marker=-95.043611,29.642777&level=13>.

The FOP program regulates both new and existing major sources of emissions. The goal of the program is to improve air quality in Texas through increased compliance by codifying existing applicable regulatory requirements into the FOP. The FOP provides the applicant authorization to operate the equipment at the site. The FOP identifies and codifies air emission requirements (known as applicable requirements) that apply to the emission units at the site. The FOP does not authorize construction of emission units or emissions from those units. The New Source Review (NSR) permit is the mechanism for these authorizations.

The Honorable Mayes Middleton
Page 2
August 7, 2023

Re: Accepted Federal Operating Permit Renewal Application

This letter is being sent to you for information only and no action is required. If you need further information, please contact me at (512) 239-1250.

Sincerely,

A handwritten signature in black ink, appearing to read "Samuel Short", followed by a long horizontal line extending to the right.

Samuel Short, Deputy Director
Air Permits Division
Office of Air
Texas Commission on Environmental Quality

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Kelly Keel, *Interim Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 7, 2023

THE HONORABLE DENNIS PAUL
TEXAS HOUSE OF REPRESENTATIVES
PO BOX 2910
AUSTIN TX 78768-2910

Re: Accepted Federal Operating Permit Renewal Application
Project Number: 35475
Permit Number: O3759
Kuraray America, Inc.
Pvoh Plant
La Porte, Harris County
Regulated Entity Number: RN106155849
Customer Reference Number: CN603315953

Dear Representative Paul:

This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) renewal application for a site located in your district. As part of this permitting process, the applicant is required to publish a formal newspaper public notice. The notice will inform the public of their right to make comments or request a public hearing. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. <https://gisweb.tceq.texas.gov/LocationMapper/?marker=-95.043611,29.642777&level=13>.

The FOP program regulates both new and existing major sources of emissions. The goal of the program is to improve air quality in Texas through increased compliance by codifying existing applicable regulatory requirements into the FOP. The FOP provides the applicant authorization to operate the equipment at the site.

This letter is being sent to you for information only and no action is required. If you need further information, please contact me at (512) 239-1250.

Sincerely,

A handwritten signature in black ink, appearing to read "Samuel Short", followed by a long horizontal line.

Samuel Short, Deputy Director
Air Permits Division
Office of Air
Texas Commission on Environmental Quality

Carolyn Thomas

From: Johnny Bowers
Sent: Monday, August 7, 2023 8:04 AM
To: Carolyn Thomas
Subject: FW: STEERS Title V Application Submittal (New Application)

Please process. Thanks!

-----Original Message-----

From: steers@tceq.texas.gov <steers@tceq.texas.gov>
Sent: Friday, August 4, 2023 3:39 PM
To: RFCAIR12 <RFCAIR12@tceq.texas.gov>; air_permits@pcs.hctx.net; TVAPPS <tvapps@tceq.texas.gov>
Subject: STEERS Title V Application Submittal (New Application)

The TV-E application has been successfully submitted by CHARLES NEAL. The submittal was received at 08/04/2023 03:38 PM.

The Reference number for this submittal is 583728

The confirmation number for this submittal is 483231.

The Area ID for this submittal is 3759.

The Project ID for this submittal is 35475.

The hash code for this submittal is 3BB3A53E670FD127828DEDD98A8312C9139AD7B34C5CF699AE55BB5BC4F2EE75.

You may access the original application submittal and the notice of final action documents from the COR Viewer which is available at <https://ida.tceq.texas.gov/steersstaff/index.cfm?fuseaction=openadmin.submitlog&newsearch=yes>.

If you have any questions, please contact the STEERS Help Line at 512-239-6925 or by e-mail at steers@tceq.texas.gov.

Texas Commission on Environmental Quality

Title V Existing

3759

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	PVOH PLANT
County	HARRIS
Latitude (N) (##.#####)	29.642777
Longitude (W) (-###.#####)	95.043611
Primary SIC Code	0
Secondary SIC Code	
Primary NAICS Code	325211
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN106155849
What is the name of the Regulated Entity (RE)?	PVA PLANT
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	13100 BAY AREA BLVD
City	LA PORTE
State	TX
ZIP	77571
County	HARRIS
Latitude (N) (##.#####)	
Longitude (W) (-###.#####)	
Facility NAICS Code	
What is the primary business of this entity?	

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN603315953
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Kuraray America, Inc.
Texas SOS Filing Number	13289806
Federal Tax ID	
State Franchise Tax ID	11341199955
State Sales Tax ID	
Local Tax ID	
DUNS Number	948095245
Number of Employees	101-250
Independently Owned and Operated?	Yes

Responsible Official Contact

Person TCEQ should contact for questions about this application:	
Organization Name	KURARAY AMERICA INC
Prefix	MR
First	CHARLES
Middle	
Last	NEAL
Suffix	
Credentials	
Title	GENERAL MANAGER PVOH BUSINESS UNIT
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic

Mailing Address (include Suite or Bldg. here, if applicable)	11500 BAY AREA BLVD
Routing (such as Mail Code, Dept., or Attn:)	
City	PASADENA
State	TX
ZIP	77507
Phone (###-###-####)	8325688331
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	Charles.Neal@kuraray.com

Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application

Select existing DAR contact or enter a new contact.

Organization Name	NELSON RODRIGUEZ-GARCIA(KURARAY AMERICA...)
Prefix	KURARAY AMERICA INC
First	MR
Middle	NELSON
Last	
Suffix	RODRIGUEZ-GARCIA
Credentials	
Title	PLANT MANAGER

Enter new address or copy one from list

Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	13100 BAY ARE BLVD
Routing (such as Mail Code, Dept., or Attn:)	
City	LA PORTE

State	TX
Zip	77571
Phone (###-###-####)	8325688303
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	Nelson.Rodriguez-Garcia@kuraray.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

Organization Name	JENNIFER REZA(KURARAY AMERICA...)
Prefix	KURARAY AMERICA INC
First	MRS
Middle	JENNIFER
Last	REZA
Suffix	
Credentials	
Title	SR HSE SPECIALIST
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	11500 BAY AREA BLVD
Routing (such as Mail Code, Dept., or Attn:)	
City	PASADENA
State	TX
ZIP	77507
Phone (###-###-####)	2815499479

Extension

Alternate Phone (###-###-####)

Fax (###-###-####)

E-mail

Jennifer.reza@kuraray.com

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	29 Deg 38 Min 34 Sec
3) Permit Longitude Coordinate:	95 Deg 2 Min 37 Sec
4) Is this submittal a new application or an update to an existing application?	New Application
4.1. What type of permitting action are you applying for?	Renewal
4.1.1. Are there any permits that should be voided upon issuance of this permit application through permit conversion?	No
4.1.2. Are there any permits that should be voided upon issuance of this permit application through permit consolidation?	No
5) Who will electronically sign this Title V application?	Duly Authorized Representative
6) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

Attach OP-2 (Application for Permit Revision/Renewal)

Attach OP-ACPS (Application Compliance Plan and Schedule)

Attach OP-REQ1 (Application Area-Wide Applicability Determinations and General Information)

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

If applicable, attach OP-AR1 (Acid Rain Permit Application)

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name	_O3759 Renewal Application Final 8-4-23 to STEERS.pdf
Hash	635A725CB9F6A9EBF4DB35DADED07FD6ACFCA19E3BAC431682F62FB6FA7A85EF
MIME-Type	application/pdf

An additional space to attach any other necessary information needed to complete the permit.

Expedite Title V

1) Per Texas Health and Safety Code, Section 382.05155,
does the applicant want to expedite the processing of this
application?

No

Certification

I certify that I am the Duly Authorized Representative for this application and that, based on information and belief formed after reasonable inquiry, the statements and information on this form are true, accurate, and complete.

1. I am Nelson Rodriguez-Garcia, the owner of the STEERS account ER083192.
2. I have the authority to sign this data on behalf of the applicant named above.
3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
8. I am knowingly and intentionally signing Title V Existing 3759.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEQ.

OWNER OPERATOR Signature: Nelson Rodriguez-Garcia OWNER OPERATOR

Account Number:	ER083192
Signature IP Address:	216.81.46.100
Signature Date:	2023-08-04
Signature Hash:	55E0D137EDFDF5D6D7715FE650D2C0770A0FB0DBE95D202C10FFC1E8203ED0EC
Form Hash Code at time of Signature:	3BB3A53E670FD127828DEDD98A8312C9139AD7B34C5CF699AE55BB5BC4F2EE75

Submission

Reference Number:	The application reference number is 583728
Submitted by:	The application was submitted by ER083192/Nelson Rodriguez-Garcia
Submitted Timestamp:	The application was submitted on 2023-08-04 at 15:38:44

Submitted From:

CDT

The application was submitted from IP address
216.81.46.100

Confirmation Number:

The confirmation number is 483231

Steers Version:

The STEERS version is 6.68

Permit Number:

The permit number is 3759

Additional Information

Application Creator: This account was created by Meng Yao



August 4, 2023

**Texas Commission on Environmental Quality
Air Permits Initial Review Team ("APIRT")
Mail Code 161
12100 Park 35 Circle, Building C, Third Floor
Austin, Texas 78753**

**RE: Title V Permit Number O3759
Permit Renewal Application
Kuraray America, Inc. (CN603315953)
PVA Plant (RN106155849)**

Dear Sir or Madam,

On behalf of Kuraray America, Inc. ("Kuraray"), Spirit Environmental, LLC ("Spirit") is submitting the enclosed permit renewal application for Title V Federal Operating Permit ("FOP") O3759.

If you have any questions or comments regarding this submittal, please contact Ms. Jennifer Reza at (281) 549-9479 or via email at Jennifer.Reza@kuraray.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Katharina Engelland'.

Katharina Engelland
Associate Project Manager

Enclosures

cc: TCEQ Region 12
Attention: Air Section Manager
5425 Polk St, Ste. H
Houston, Texas 77023-1452
VIA STEERS

EPA Region 6
VIA Email: R6AirPermitsTX@epa.gov

Harris County
Dr. Latrice Babin
Executive Director
Harris County Pollution Control
101 South Richey, Suite H
Pasadena, Texas 77506
VIA STEERS

OFFICE: 281-664-2490
FAX: 281-664-2491

20465 State Highway 249, Suite 300
Houston, TX 77070

spiritenv.com



FOP O3759 Renewal Application

Kuraray Poly Vinyl Alcohol Plant

Harris County, Texas

August 2023

PREPARED FOR:

Kuraray America, Inc.

TCEQ PROJECT: TBA

SPIRIT PROJECT: 23241.00A

FOR SPIRIT ENVIRONMENTAL:

A handwritten signature in black ink, appearing to read 'Meagan Hale'.

Meagan Hale

A handwritten signature in black ink, appearing to read 'Katharina Engelland'.

Katharina Engelland

A handwritten signature in black ink, appearing to read 'Megan Yao'.

Megan Yao

OFFICE: 281-664-2490

FAX: 281-664-2491

20465 State Highway 249, Suite 300
Houston, TX 77070

spiritenv.com

Table of Contents

1.0	Introduction	1-1
1.1	Facility Contact Information	1-2
1.2	Federal Attainment/Major Source Status	1-3
2.0	Title V Renewal and Revision Forms	2-1
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2.2	Technical Forms	2-1

1.0 Introduction

Kuraray America, Inc. ("Kuraray") (CN603315953) is submitting an application for the Kuraray Poly Vinyl Alcohol Plant ("The Site") (RN106155849) to renew their Title V Federal Operating Permit ("FOP") Number ("No.") O3759, which is a Site Operating Permit ("SOP").

The Site is located in Harris County, which has been designated as a severe nonattainment area for ozone and ozone precursors (including volatile organic compounds ["VOCs"] and nitrogen oxides ["NO_x"]).

The current SOP is set to expire February 6, 2024. In order to avoid expiration of the existing permit and maintain compliance at the site, Kuraray is submitting this SOP renewal application by the renewal deadline of August 6, 2023. Per Title 30 of the Texas Administrative Code ("30 TAC") §122.133(2), Kuraray is required to submit a permit renewal application at least six (6) months, but no earlier than 18 months, prior to the expiration date of the existing Title V permit.

The following revisions are being requested:

- The wastewater streams have combined total annual average concentration of compounds less than 30,000 ppmw and therefore are Group 2 streams under 40CFR Part 63, Subpart FFFF. This revision is represented in the OP-REQ1.
- Three wastewater storage tanks T-061, V-606, and T-920 are not subject to 40 CFR Part 63 Subpart FFFF Group 1 wastewater requirements. OP-REQ2 is being submitted for the three tanks.
- OP-SUMR is being submitted to update the NSR authorization numbers for several units.

Section 2.0 of this document contains a list of all forms included in this renewal application.

1.1 Facility Contact Information

Registrant:	Kuraray America, Inc. 13100 Bay Area Boulevard Pasadena, TX 77507
Official Contact:	Mr. Charles Neal Title: Plant Manager Phone: (832) 568-8331 Email: Charles.Neal@kuraray.com
Responsible Official:	Mr. Charles Neal Title: General Manager of the PVOH Business
Facility Operations:	Kuraray Poly Vinyl Alcohol Plant
Permit Number:	O3759
Regulated Entity Number:	RN106155849
Customer Reference Number:	CN603315953
City:	Pasadena, TX
County:	Harris
Technical Contact Information:	Kuraray America, Inc. 13100 Bay Area Boulevard Pasadena, TX 77507 Phone: (281) 549-9479 E-mail: Jennifer.Reza@kuraray.com Contact: Ms. Jennifer Reza Senior HSE Specialist

1.2 Federal Attainment/Major Source Status

Company Name	Kuraray America, Inc.				
Facility Name	Kuraray Poly Vinyl Alcohol Plant				
County	Harris County				
NAAQS Pollutant	Nonattainment Status of the County	Federal Clean Air Act Title V		Prevention of Significant Deterioration ("PSD")	
		30 TAC §122.10 Major Source Threshold (tpy)	Major or Minor?	40 CFR §52.21(b)(1)(i) Major Source Threshold (tpy)	Major or Minor?
VOC	Severe	25	Minor	<i>Nonattainment</i>	--
NO _x	Severe	25	Minor	<i>Nonattainment</i>	--
CO	Attainment	100	Minor	250	Minor
PM	Attainment	100	Minor	250	Minor
SO ₂	Attainment	100	Minor	250	Minor
Lead	Attainment	100	Minor	250	Minor
Single HAP	--	10	MAJOR	--	--
Aggregate HAPs	--	25	MAJOR	--	--
Any other	Attainment	100	Minor	250	Minor
Title V Federal Operating Permit Required?			Yes		
Title V Federal Operating Permit Number			O3759		
PSD Permit Required?				No	
PSD Permit Number				--	

2.0 Title V Renewal and Revision Forms

This section contains all forms necessary to renew the existing FOP O3759 for The Site. The following lists outline the included forms.

2.1 Administrative Forms

- OP-1, Site Information Summary
- OP-2, Application for Permit Revision/Renewal
- OP-CRO1
- OP-ACPS, Application Compliance Plan and Schedule

2.2 Technical Forms

- OP-REQ1, Area-Wide Applicability Determinations and General Information
- OP-REQ2, Negative Applicable/Superseded Requirement Determinations
- OP-SUMR, Individual Unit Summary for Revisions
- OP-UA Forms
- OP-PBRSUP, Permits By Rule Supplemental Table

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 1)
Texas Commission on Environmental Quality**

Please print or type all information. Direct any questions regarding this application form to the Air Permits Division at (512) 239-1250 or to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division (MC 163), P.O. Box 13087, Austin, Texas 78711-3087.

I. Company Identifying Information
A. Company Name: Kuraray America, Inc.
B. Customer Reference Number (CN): CN603315953
C. Submittal Date (mm/dd/yyyy): 08/04/2023
II. Site Information
A. Site Name: PVA Plant
B. Regulated Entity Reference Number (RN): RN106155849
C. Indicate affected state(s) required to review permit application: <i>(Check the appropriate box[es].)</i>
<input type="checkbox"/> AR <input type="checkbox"/> CO <input type="checkbox"/> KS <input type="checkbox"/> LA <input type="checkbox"/> NM <input type="checkbox"/> OK <input checked="" type="checkbox"/> N/A
D. Indicate all pollutants for which the site is a major source based on the site's potential to emit: <i>(Check the appropriate box[es].)</i>
<input type="checkbox"/> VOC <input type="checkbox"/> NO _x <input type="checkbox"/> SO ₂ <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> CO <input type="checkbox"/> Pb <input checked="" type="checkbox"/> HAPS
Other:
E. Is the site a non-major source subject to the Federal Operating Permit Program? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
F. Is the site within a local program area jurisdiction? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
G. Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
H. Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:
III. Permit Type
A. Type of Permit Requested: <i>(Select only one response)</i>
<input checked="" type="checkbox"/> Site Operating Permit (SOP) <input type="checkbox"/> Temporary Operating Permit (TOP) <input type="checkbox"/> General Operating Permit (GOP)

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 2)
Texas Commission on Environmental Quality**

IV. Initial Application Information <i>(Complete for Initial Issuance Applications Only.)</i>
A. Is this submittal an abbreviated or a full application? <input type="checkbox"/> Abbreviated <input type="checkbox"/> Full
B. If this is a full application, is the submittal a follow-up to an abbreviated application? <input type="checkbox"/> YES <input type="checkbox"/> NO
C. If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit? <input type="checkbox"/> YES <input type="checkbox"/> NO
D. Has an electronic copy of this application been submitted (or is being submitted) to EPA? (Refer to the form instructions for additional information.) <input type="checkbox"/> YES <input type="checkbox"/> NO
V. Confidential Information
A. Is confidential information submitted in conjunction with this application? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
VI. Responsible Official (RO) Identifying Information
RO Name Prefix: (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
RO Full Name: Charles Neal
RO Title: General Manager of the PVOH Business
Employer Name: Kuraray America, Inc.
Mailing Address: 13100 Bay Area Boulevard
City: Pasadena
State: Texas
ZIP Code: 77507
Territory:
Country: United States
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (832) 568-8331
Fax No.:
Email: Charles.Neal@kuraray.com

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 3)
Texas Commission on Environmental Quality**

VII. Technical Contact Identifying Information <i>(Complete if different from RO.)</i>
Technical Contact Name Prefix: (<input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input checked="" type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Technical Contact Full Name: Jennifer Reza
Technical Contact Title: Senior HSE Specialist
Employer Name: Kuraray America, Inc.
Mailing Address: 11500 Bay Area Boulevard
City: Pasadena
State: Texas
ZIP Code: 77507
Territory:
Country: United States
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (281) 549-9479
Fax No.:
Email: Jennifer.Reza@kuraray.com
VIII. Reference Only Requirements <i>(For reference only.)</i>
A. State Senator: Mayes Middleton
B. State Representative: Dennis Paul
C. Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
D. Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
E. Indicate the alternate language(s) in which public notice is required: Spanish

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 4)
Texas Commission on Environmental Quality**

IX. Off-Site Permit Request <i>(Optional for applicants requesting to hold the FOP and records at an off-site location.)</i>
A. Office/Facility Name:
B. Physical Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
C. Physical Location:
D. Contact Name Prefix: (<input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Contact Full Name:
E. Telephone No.:
X. Application Area Information
A. Area Name: PVOH Plant
B. Physical Address: 13100 Bay Area Boulevard
City: Pasadena
State: Texas
ZIP Code: 77507
C. Physical Location:
D. Nearest City:
E. State:
F. ZIP Code:

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 5)
Texas Commission on Environmental Quality**

X. Application Area Information <i>(continued)</i>
G. Latitude (nearest second): 029:38:34
H. Longitude (nearest second): 095:02:37
I. Are there any emission units that were not in compliance with the applicable requirements identified in the application at the time of application submittal? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
J. Indicate the estimated number of emission units in the application area: 60
K. Are there any emission units in the application area subject to the Acid Rain Program? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
XI. Public Notice <i>(Complete this section for SOP Applications and Acid Rain Permit Applications only.)</i>
A. Name of a public place to view application and draft permit: La Porte Public Library
B. Physical Address: 600 South Broadway Street
City: La Porte
ZIP Code: 77571
C. Contact Person (Someone who will answer questions from the public during the public notice period):
Contact Name Prefix: (<input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input checked="" type="checkbox"/> Ms. <input type="checkbox"/> Dr.):
Contact Person Full Name: Jennifer Reza
Contact Mailing Address: 11500 Bay Area Boulevard
City: Pasadena
State: Texas
ZIP Code: 77507
Territory:
Country: United States
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (281) 549-9479

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1
Texas Commission on Environmental Quality**

Date: 08/04/2023	
Permit No.: O3759	
Regulated Entity No.: RN106155849	
Company Name: Kuraray America, Inc.	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
I. Application Type	
Indicate the type of application:	
<input checked="" type="checkbox"/> Renewal	
<input type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
<input checked="" type="checkbox"/> Significant Revision	
<input type="checkbox"/> Revision Requesting Prior Approval	
<input type="checkbox"/> Administrative Revision	
<input type="checkbox"/> Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
For GOP Revisions Only	<input type="checkbox"/> YES <input type="checkbox"/> NO

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1 (continued)
Texas Commission on Environmental Quality**

III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)
Indicate all pollutants for which the site is a major source based on the site's potential to emit: (Check the appropriate box[es].)
<input type="checkbox"/> VOC <input type="checkbox"/> NO _x <input type="checkbox"/> SO ₂ <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> CO <input type="checkbox"/> Pb <input checked="" type="checkbox"/> HAP
Other:
IV. Reference Only Requirements (For reference only)
Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
V. Delinquent Fees and Penalties
Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 2
Texas Commission on Environmental Quality**

Date: 08/04/2023
Permit No.: O3759
Regulated Entity No.: RN106155849
Company Name: Kuraray America, Inc.

Using the table below, provide a description of the revision.

Revision No.	Revision Code		Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
1	MS-C	NO	Multiple	OP-UAs	96510	Kuraray is submitting the applicable OP-UA forms which have been updated since the last application.
2	MS-A	NO	C3111HDR FUGITIVES EMGEN	OP-SUMR	96510	Kuraray is submitting the OP-SUMR form to update the NSR authorizations for the listed sources.
3	SIG-A	NO	T-061 V-606 T-920	OP-UA3	96510	Wastewater streams only contain compounds listed in Table 9 of 40CFR Part 63, Subpart FFFF. The combined total annual average concentration of compounds is less than 30,000 ppmw and therefore the wastewater is Group 2 under 40CFR Part 63, Subpart FFFF. The three wastewater storage tanks are not subject to MON Group 1 wastewater requirements. The attributes on OP-UA3 Table 22s have been struckthrough.
4	SIG-A	YES	DEGREASE	OP-UA16	106.454	Kuraray is adding the degreasing unit to O3759. OP-UA16 is submitted to address Ch. 115 applicability.

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 3
Texas Commission on Environmental Quality**

Date: 08/04/2023	
Permit No.: O3759	
Regulated Entity No.: RN106155849	
Company Name: Kuraray America, Inc.	
I. Significant Revision <i>(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)</i>	
A.	Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
B.	Indicate the alternate language(s) in which public notice is required: Spanish
C.	Will, there be a change in air pollutant emissions as a result of the significant revision? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. Identifying Information		
RN: RN106155849	CN: CN603315953	Account No.:
Permit No.: O3759	Project No.: TBA	
Area Name: PVOH Plant	Company Name: Kuraray America, Inc.	
II. Certification Type <i>(Please mark the appropriate box)</i>		
<input type="checkbox"/> Responsible Official	<input checked="" type="checkbox"/> Duly Authorized Representative	
III. Submittal Type <i>(Please mark the appropriate box) (Only one response can be accepted per form)</i>		
<input type="checkbox"/> SOP/TOP Initial Permit Application	<input type="checkbox"/> Update to Permit Application	
<input type="checkbox"/> GOP Initial Permit Application	<input checked="" type="checkbox"/> Permit Revision, Renewal, or Reopening	
<input type="checkbox"/> Other: _____		
IV. Certification of Truth		
<p>This certification does not extend to information which is designated by the TCEQ as information for reference only.</p> <p>I, <u>Nelson Rodriguez-Garcia</u> certify that I am the <u>DAR</u> <i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i></p> <p>and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:</p> <p><i>Note: Enter Either a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i></p> <p>Time Period: From _____ to _____ <i>Start Date</i> <i>End Date</i></p> <p>Specific Dates: <u>August 4, 2023</u> _____ <i>Date 1</i> <i>Date 2</i> <i>Date 3</i> <i>Date 4</i> <i>Date 5</i> <i>Date 6</i></p>		
Signature: _____ Signature Date: _____		
Title: <u>Plant Manager</u>		

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 08/04/2023	Regulated Entity No.: RN106155849	Permit No.: O3759
Company Name: Kuraray America, Inc.		Area Name: PVOH Plant

- Part 1 of this form must be submitted with all initial FOP applications and renewal applications.
- The Responsible Official must use Form OP-CRO1 (Certification by Responsible Official) to certify information contained in this form in accordance with 30 TAC § 122.132(d)(8).

Part 1

A. Compliance Plan — Future Activity Committal Statement	
<p>The <i>Responsible Official</i> commits, utilizing reasonable effort, to the following: As the responsible official it is my intent that all emission units shall continue to be in compliance with all applicable requirements they are currently in compliance with, and all emission units shall be in compliance by the compliance dates with any applicable requirements that become effective during the permit term.</p>	
B. Compliance Certification - Statement for Units in Compliance* (Indicate response by entering an "X" in the appropriate column)	
1. With the exception of those emission units listed in the Compliance Schedule section of this form (Part 2, below), and based, at minimum, on the compliance method specified in the associated applicable requirements, are all emission units addressed in this application in compliance with all their respective applicable requirements as identified in this application?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. If the response to Item B.2, above, is "Yes," indicate the total number of Part 2 attachments included in this submittal. <i>(For reference only)</i>	
<p><small>* For Site Operating Permits (SOPs), the complete application should be consulted for applicable requirements and their corresponding emission units when assessing compliance status. For General Operating Permits (GOPs), the application documentation, particularly Form OP-REQ1 should be consulted as well as the requirements contained in the appropriate General Permits portion of 30 TAC Chapter 122.</small></p> <p><i>Compliance should be assessed based, at a minimum, on the required monitoring, testing, record keeping, and/or reporting requirements, as appropriate, associated with the applicable requirement in question.</i></p>	

Texas Commission on Environmental Quality
Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1
Federal Operating Permit Program

Date:	08/04/2023
Permit No.:	O3759
RN No.:	RN106155849

For SOP applications, answer ALL questions unless otherwise directed.

◆ *For GOP applications, answer ONLY these questions unless otherwise directed.*

(a) Form OP-REQ1: Page 1	
I. Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter	
A. Visible Emissions	
1. The application area includes stationary vents constructed on or before January 31, 1972.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes stationary vents constructed after January 31, 1972. <i>If the responses to Questions I.A.1 and I.A.2 are both "NO," go to Question I.A.6.</i> <i>If the response to Question I.A.1 is "NO" and the response to Question I.A.2 is "YES," go to Question I.A.4.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area is opting to comply with the requirements for stationary vents constructed after January 31, 1972 for vents in the application area constructed on or before January 31, 1972.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. All stationary vents are addressed on a unit specific basis.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
5. Test Method 9 (40 CFR Part 60, Appendix A, Method 9 - Visual Determination of the Opacity of Emissions from Stationary Sources) is used to determine opacity of emissions in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
6. The application area includes structures subject to 30 TAC § 111.111(a)(7)(A).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
7. The application area includes sources, other than those specified in 30 TAC § 111.111(a)(1), (4), or (7), subject to 30 TAC § 111.111(a)(8)(A).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
8. Emissions from units in the application area include contributions from uncombined water.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
9. The application area is located in the City of El Paso, including Fort Bliss Military Reservation, and includes solid fuel heating devices subject to 30 TAC § 111.111(c).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A

Texas Commission on Environmental Quality
Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1
Federal Operating Permit Program

Date:	08/04/2023
Permit No.:	O3759
RN No.:	RN106155849

For SOP applications, answer ALL questions unless otherwise directed.

◆ *For GOP applications, answer ONLY these questions unless otherwise directed.*

(b) Form OP-REQ1: Page 2	
I. Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter (continued)	
B. Materials Handling, Construction, Roads, Streets, Alleys, and Parking Lots	
1. Items a - d determines applicability of any of these requirements based on geographical location.	
a.	The application area is located within the City of El Paso. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
b.	The application area is located within the Fort Bliss Military Reservation, except areas specified in 30 TAC § 111.141. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
c.	The application area is located in the portion of Harris County inside the loop formed by Beltway 8. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
d.	The application area is located in the area of Nueces County outlined in Group II state implementation plan (SIP) for inhalable particulate matter adopted by the TCEQ on May 13, 1988. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<i>If there is any "YES" response to Questions I.B.1.a - d, answers Questions I.B.2.a - d. If all responses to Questions I.B.1.a-d are "NO," go to Section I.C.</i>	
2. Items a - d determine the specific applicability of these requirements.	
a.	The application area is subject to 30 TAC § 111.143. <input type="checkbox"/> YES <input type="checkbox"/> NO
b.	The application area is subject to 30 TAC § 111.145. <input type="checkbox"/> YES <input type="checkbox"/> NO
c.	The application area is subject to 30 TAC § 111.147. <input type="checkbox"/> YES <input type="checkbox"/> NO
d.	The application area is subject to 30 TAC § 111.149. <input type="checkbox"/> YES <input type="checkbox"/> NO
C. Emissions Limits on Nonagricultural Processes	
1.	The application area includes a nonagricultural process subject to 30 TAC § 111.151. <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2.	The application area includes a vent from a nonagricultural process that is subject to additional monitoring requirements. <i>If the response to Question I.C.2 is "NO," go to Question I.C.4.</i> <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3.	All vents from nonagricultural process in the application area are subject to additional monitoring requirements. <input type="checkbox"/> YES <input type="checkbox"/> NO

Texas Commission on Environmental Quality
Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1
Federal Operating Permit Program

Date:	08/04/2023
Permit No.:	O3759
RN No.:	RN106155849

For SOP applications, answer ALL questions unless otherwise directed.

◆ *For GOP applications, answer ONLY these questions unless otherwise directed.*

(c) Form OP-REQ1: Page 3	
I. Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter (continued)	
C. Emissions Limits on Nonagricultural Processes (continued)	
4. The application area includes oil or gas fuel-fired steam generators subject to 30 TAC §§ 111.153(a) and 111.153(c).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
5. The application area includes oil or gas fuel-fired steam generators that are subject to additional monitoring requirements. <i>If the response to Question I.C.5 is "NO," go to Question I.C.7.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
6. All oil or gas fuel-fired steam generators in the application area are subject to additional monitoring requirements.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes solid fossil fuel-fired steam generators subject to 30 TAC §§ 111.153(a) and 111.153(b).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
8. The application area includes solid fossil fuel-fired steam generators that are subject to additional monitoring requirements. <i>If the response to Question I.C.8 is "NO," go to Section I.D.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
9. All solid fossil fuel-fired steam generators in the application area are subject to additional monitoring requirements.	<input type="checkbox"/> YES <input type="checkbox"/> NO
D. Emissions Limits on Agricultural Processes	
1. The application area includes agricultural processes subject to 30 TAC § 111.171.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
E. Outdoor Burning	
1. Outdoor burning is conducted in the application area. <i>If the response to Question I.E.1 is "NO," go to Section II.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. Fire training is conducted in the application area and subject to the exception provided in 30 TAC § 111.205.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. Fires for recreation, ceremony, cooking, and warmth are used in the application area and subject to the exception provided in 30 TAC § 111.207.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. Disposal fires are used in the application area and subject to the exception provided in 30 TAC § 111.209.	<input type="checkbox"/> YES <input type="checkbox"/> NO

Texas Commission on Environmental Quality
Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1
Federal Operating Permit Program

Date:	08/04/2023
Permit No.:	O3759
RN No.:	RN106155849

For SOP applications, answer ALL questions unless otherwise directed.

◆ *For GOP applications, answer ONLY these questions unless otherwise directed.*

(d) Form OP-REQ1: Page 4		
I. Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter (continued)		
E. Outdoor Burning (continued)		
5.	Prescribed burning is used in the application area and subject to the exception provided in 30 TAC § 111.211.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6.	Hydrocarbon burning is used in the application area and subject to the exception provided in 30 TAC § 111.213.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7.	The application area has received the TCEQ Executive Director approval of otherwise prohibited outdoor burning according to 30 TAC § 111.215.	<input type="checkbox"/> YES <input type="checkbox"/> NO
II. Title 30 TAC Chapter 112 - Control of Air Pollution from Sulfur Compounds		
A. Temporary Fuel Shortage Plan Requirements		
1.	The application area includes units that are potentially subject to the temporary fuel shortage plan requirements of 30 TAC §§ 112.15 - 112.18.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds		
A. Applicability		
1.	The application area is located in the Houston/Galveston/Brazoria area, Beaumont/Port Arthur area, Dallas/Fort Worth area, El Paso area, or a covered attainment county as defined by 30 TAC § 115.10. <i>See instructions for inclusive counties. If the response to Question III.A.1 is "NO," go to Section IV.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
B. Storage of Volatile Organic Compounds		
1.	The application area includes storage tanks, reservoirs, or other containers capable of maintaining working pressure sufficient at all times to prevent any VOC vapor or gas loss to the atmosphere.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

Texas Commission on Environmental Quality
Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1
Federal Operating Permit Program

Date:	08/04/2023
Permit No.:	O3759
RN No.:	RN106155849

For SOP applications, answer ALL questions unless otherwise directed.

◆ *For GOP applications, answer ONLY these questions unless otherwise directed.*

(e) Form OP-REQ1: Page 5	
III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)	
C. Industrial Wastewater	
1. The application area includes affected VOC wastewater streams of an affected source category, as defined in 30 TAC § 115.140. <i>If the response to Question III.C.1 is "NO" or "N/A," go to Section III.D.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area is located at a petroleum refinery in the Beaumont/Port Arthur or Houston/Galveston/Brazoria area. <i>If the response to Question III.C.2 is "YES" and the refinery is in the Beaumont/Port Arthur area, go to Section III.D.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area is complying with the provisions of 40 CFR Part 63, Subpart G, as an alternative to complying with this division (relating to Industrial Wastewater). <i>If the response to Question III.C.3 is "YES," go to Section III.D.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
4. The application area is located at a plant with an annual VOC loading in wastewater, as determined in accordance with 30 TAC § 115.148, less than or equal to 10 Mg (11.03 tons). <i>If the response to Question III.C.4 is "YES," go to Section III.D.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
5. The application area includes wastewater drains, junction boxes, lift stations, or weirs that are subject to the control requirements of 30 TAC § 115.142(1).	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes wastewater drains, junction boxes, lift stations, or weirs that handle streams chosen for exemption under 30 TAC § 115.147(2).	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes wastewater drains, junction boxes, lift stations, or weirs that have an executive director approved exemption under 30 TAC § 115.147(4).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
D. Loading and Unloading of VOCs	
1. The application area includes VOC loading operations.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area includes VOC transport vessel unloading operations. <i>For GOP applications, if the responses to Questions III.D.1 - D.2 are "NO," go to Section III.E.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

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(f) Form OP-REQ1: Page 6	
III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)	
D. Loading and Unloading of VOCs (continued)	
3. Transfer operations at motor vehicle fuel dispensing facilities are the only VOC transfer operations conducted in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
E. Filling of Gasoline Storage Vessels (Stage I) for Motor Vehicle Fuel Dispensing Facilities	
1. The application area includes one or more motor vehicle fuel dispensing facilities and gasoline is transferred from a tank-truck tank into a stationary storage container. <i>If the response to Question III.E.1 is "NO," go to Section III.F.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. Transfers to stationary storage containers used exclusively for the fueling of agricultural implements are the only transfer operations conducted at facilities in the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. All transfers at facilities in the application area are made into stationary storage containers with internal floating roofs, external floating roofs, or their equivalent. <i>If the response to Question III.E.2 and/or E.3 is "YES," go to Section III.F.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area is located in a covered attainment county as defined in 30 TAC § 115.10. <i>If the response to Question III.E.4 is "NO," go to Question III.E.9.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. Stationary gasoline storage containers with a nominal capacity less than or equal to 1,000 gallons are located at the facility.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. Stationary gasoline storage containers with a nominal capacity greater than 1,000 gallons are located at the facility.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. At facilities located in covered attainment counties other than Bastrop, Bexar, Caldwell, Comal, Guadalupe, Hays, Travis, Williamson, or Wilson County, transfers are made to stationary storage tanks greater than 1000 gallons located at a facility which has dispensed less than 100,000 gallons of gasoline in a calendar month after October 31, 2014. <i>If the response to Question III.E.7 is "YES," go to Section III.F.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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(g) Form OP-REQ1: Page 7	
III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)	
E. Filling of Gasoline Storage Vessels (Stage I) for Motor Vehicle Fuel Dispensing Facilities (continued)	
8.	At facilities located in Bastrop, Bexar, Caldwell, Comal, Guadalupe, Hays, Travis, Williamson, or Wilson County, transfers are made to stationary storage tanks greater than 1000 gallons located at a facility which has dispensed no more than 25,000 gallons of gasoline in a calendar month after December 31, 2004. <i>If the response to Question III.E.8 is "YES," go to Section III.F.</i>
	<input type="checkbox"/> YES <input type="checkbox"/> NO
9.	Transfers are made to stationary storage tanks located at a motor vehicle fuel dispensing facility which has dispensed no more than 10,000 gallons of gasoline in any calendar month after January 1, 1991 and for which construction began prior to November 15, 1992.
	<input type="checkbox"/> YES <input type="checkbox"/> NO
10.	Transfers are made to stationary storage tanks located at a motor vehicle fuel dispensing facility which has dispensed more than 10,000 gallons of gasoline in any calendar month after January 1, 1991 and for which construction began prior to November 15, 1992.
	<input type="checkbox"/> YES <input type="checkbox"/> NO
11.	Transfers are made to stationary storage tanks located at a motor vehicle fuel dispensing facility which commenced construction on or after November 15, 1992.
	<input type="checkbox"/> YES <input type="checkbox"/> NO
12.	At facilities located in Ellis, Johnson, Kaufman, Parker, or Rockwall County, transfers are made to stationary storage tanks located at a facility which has dispensed at least 10,000 gallons of gasoline but less than 125,000 gallons of gasoline in a calendar month after April 30, 2005.
	<input type="checkbox"/> YES <input type="checkbox"/> NO
F. Control of VOC Leaks from Transport Vessels (Complete this section for GOP applications for GOPs 511, 512, 513 and 514 only)	
1.	Tank-truck tanks are filled with, or emptied of, gasoline at a facility that is subject to 30 TAC § 115.214(a)(1)(C) or 115.224(2) within the application area.
	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A

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(h) Form OP-REQ1: Page 8	
III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)	
F. Control of VOC Leaks from Transport Vessels (Complete this section for GOP applications for GOPs 511, 512, 513 and 514 only) (continued)	
2. Tank-truck tanks are filled with non-gasoline VOCs having a TVP greater than or equal to 0.5 psia under actual storage conditions at a facility subject to 30 TAC § 115.214(a)(1)(C) within the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
3. Tank-truck tanks are filled with, or emptied of, gasoline at a facility that is subject to 30 TAC § 115.214(b)(1)(C) or 115.224(2) within the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
G. Control of Vehicle Refueling Emissions (Stage II) at Motor Vehicle Fuel Dispensing Facilities	
1. The application area includes one or more motor vehicle fuel dispensing facilities and gasoline is transferred from a stationary storage container into motor vehicle fuel tanks. <i>If the response to Question III.G.1 is "NO" or "N/A," go to Section III.H.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area includes facilities that began construction on or after November 15, 1992 and prior to May 16, 2012.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes facilities that began construction prior to November 15, 1992. <i>If the responses to Questions III.G.2 and Question III.G.3 are both "NO," go to Section III.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes only facilities that have a monthly throughput of less than 10,000 gallons of gasoline.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The decommissioning of all Stage II vapor recovery control equipment located in the application area has been completed and the decommissioning notice submitted.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A

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(i) Form OP-REQ1: Page 9	
III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)	
H. Control Of Reid Vapor Pressure (RVP) of Gasoline	
1. The application area includes stationary tanks, reservoirs, or other containers holding gasoline that may ultimately be used in a motor vehicle in El Paso County. <i>If the response to Question III.H.1 is "NO" or "N/A," go to Section III.I.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
2. The application area includes stationary tanks, reservoirs, or other containers holding gasoline that will be used exclusively for the fueling of agricultural implements.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes a motor vehicle fuel dispensing facility.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes stationary tanks, reservoirs, or other containers holding gasoline and having a nominal capacity of 500 gallons or less.	<input type="checkbox"/> YES <input type="checkbox"/> NO
I. Process Unit Turnaround and Vacuum-Producing Systems in Petroleum Refineries	
1. The application area is located at a petroleum refinery.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
J. Surface Coating Processes (Complete this section for GOP applications only.)	
1. Surface coating operations (other than those performed on equipment located on-site and in-place) that meet the exemption specified in 30 TAC § 115.427(3)(A) or 115.427(7) are performed in the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A

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(j) Form OP-REQ1: Page 10	
III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)	
K. Cutback Asphalt	
1. Conventional cutback asphalt containing VOC solvents for the paving of roadways, driveways, or parking lots, is used or specified for use in the application area by a state, municipal, or county agency. <i>If the response to Question III.K.1 is "N/A," go to Section III.L.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The use, application, sale, or offering for sale of conventional cutback asphalt containing VOC solvents for the paving of roadways, driveways, or parking lots occurs in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
3. Asphalt emulsion is used or produced within the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
4. The application area is using an alternate control requirement as specified in 30 TAC § 115.513. <i>If the response to Question III.K.4 is "NO," go to Section III.L.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
5. The application area uses, applies, sells, or offers for sale asphalt concrete, made with cutback asphalt, that meets the exemption specified in 30 TAC § 115.517(1).	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area uses, applies, sells, or offers for sale cutback asphalt that is used solely as a penetrating prime coat.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The applicant using cutback asphalt is a state, municipal, or county agency.	<input type="checkbox"/> YES <input type="checkbox"/> NO
L. Degassing of Storage Tanks, Transport Vessels and Marine Vessels	
1. The application area includes degassing operations for stationary, marine, and/or transport vessels. <i>If the response to Question III.L.1 is "NO" or "N/A," go to Section III.M.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
2. Degassing of only ocean-going, self-propelled VOC marine vessels is performed in the application area. <i>If the response to Question III.L.2 is "YES," go to Section III.M.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A

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(k) Form OP-REQ1: Page 11	
III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)	
L. Degassing of Storage Tanks, Transport Vessels and Marine Vessels (continued)	
3. Degassing of stationary VOC storage vessels with a nominal storage capacity of 1,000,000 gallons or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
4. Degassing of stationary VOC storage vessels with a nominal storage capacity of 250,000 gallons or more, or a nominal storage capacity of 75,000 gallons and storing materials with a true vapor pressure greater than 2.6 psia, and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
5. Degassing of VOC transport vessels with a nominal storage capacity of 8,000 gallons or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
6. Degassing of VOC marine vessels with a nominal storage capacity of 10,000 barrels (420,000 gallons) or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
7. Degassing of VOC marine vessels with a nominal storage capacity of 10,000 barrels (420,000 gallons) and a vapor space partial pressure \geq 0.5 psia that have sustained damage as specified in 30 TAC § 115.547(5) is performed in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
M. Petroleum Dry Cleaning Systems	
1. The application area contains one or more petroleum dry cleaning facilities that use petroleum based solvents.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A

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(I) Form OP-REQ1: Page 12	
III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)	
N. Vent Gas Control (Highly-reactive volatile organic compounds (HRVOC))	
1. The application area includes one or more vent gas streams containing HRVOC.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area includes one or more flares that emit or have the potential to emit HRVOC. <i>If the responses to Questions III.N.1 and III.N.2 are both "NO" or "N/A," go to Section III.O. If the response to Question III.N.1 is "YES," continue with Question III.N.3.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
3. All vent streams in the application area that are routed to a flare contain less than 5.0% HRVOC by weight at all times.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
4. All vent streams in the application area that are not routed to a flare contain less than 100 ppmv HRVOC at all times. <i>If the responses to Questions III.N.3 and III.N.4 are both "NO," go to Section III.O.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
5. The application area contains pressure relief valves that are not controlled by a flare.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area has at least one vent stream which has no potential to emit HRVOC.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area has vent streams from a source described in 30 TAC § 115.727(c)(3)(A) - (H).	<input type="checkbox"/> YES <input type="checkbox"/> NO
O. Cooling Tower Heat Exchange Systems (HRVOC)	
1. The application area includes one or more cooling tower heat exchange systems that emit or have the potential to emit HRVOC.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A

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(m) Form OP-REQ1: Page 13	
IV. Title 30 TAC Chapter 117 - Control of Air Pollution from Nitrogen Compounds	
A. Applicability	
1. The application area is located in the Houston/Galveston/Brazoria, Beaumont/Port Arthur, or Dallas/Fort Worth Eight-Hour area. <i>For SOP applications, if the response to Question IV.A.1 is "YES," complete Sections IV.B - IV.F and IV.H.</i> <i>For GOP applications for GOPs 511, 512, 513, or 514, if the response to Question IV.A.1 is "YES," go to Section IV.F.</i> <i>For GOP applications for GOP 517, if the response to Question IV.A.1 is "YES," complete Sections IV.C and IV.F.</i> <i>For GOP applications, if the response to Question IV.A.1 is "NO," go to Section VI.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area is located in Bexar, Comal, Ellis, Hays, or McLennan County and includes a cement kiln. <i>If the response to Question IV.A.2 is "YES," go to Question IV.H.1.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes a utility electric generator in an east or central Texas county. <i>See instructions for a list of counties included.</i> <i>If the response to Question IV.A.3 is "YES," go to Question IV.G.1.</i> <i>If the responses to Questions IV.A.1 - 3 are all "NO," go to Question IV.H.1.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
B. Utility Electric Generation in Ozone Nonattainment Areas	
1. The application area includes units specified in 30 TAC §§ 117.1000, 117.1200, or 117.1300. <i>If the response to Question IV.B.1 is "NO," go to Question IV.C.1.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area is complying with a System Cap in 30 TAC §§ 117.1020 or 117.1220.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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(n) Form OP-REQ1: Page 14	
IV. Title 30 TAC Chapter 117 - Control of Air Pollution from Nitrogen Compounds (continued)	
C. Commercial, Institutional, and Industrial Sources in Ozone Nonattainment Areas	
1. The application area is located at a site subject to 30 TAC Chapter 117, Subchapter B and includes units specified in 30 TAC §§ 117.100, 117.300, or 117.400. <i>For SOP applications, if the response to Question IV.C.1 is "NO," go to Question IV.D.1. For GOP applications for GOP 517, if the response to Question IV.C.1 is "NO," go to Section IV.F.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area is located at a site that was a major source of NO _x before November 15, 1992.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
3. The application area includes an electric generating facility required to comply with the System Cap in 30 TAC § 117.320.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
D. Adipic Acid Manufacturing	
1. The application area is located at, or part of, an adipic acid production unit.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
E. Nitric Acid Manufacturing - Ozone Nonattainment Areas	
1. The application area is located at, or part of, a nitric acid production unit.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
F. Combustion Control at Minor Sources in Ozone Nonattainment Areas - Boilers, Process Heaters, Stationary Engines and Gas Turbines	
1. The application area is located at a site that is a minor source of NO _x in the Houston/Galveston/Brazoria or Dallas/Fort Worth Eight-Hour areas (except for Wise County). <i>For SOP applications, if the response to Question IV.F.1 is "NO," go to Question IV.G.1. For GOP applications, if the response to Question IV.F.1 is "NO," go to Section VI.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area is located in the Houston/Galveston/Brazoria area and has units that qualify for an exemption under 30 TAC § 117.2003(a).	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area is located in the Houston/Galveston/Brazoria area and has units that qualify for an exemption under 30 TAC § 117.2003(b).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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(o) Form OP-REQ1: Page 15		
IV. Title 30 TAC Chapter 117 - Control of Air Pollution from Nitrogen Compounds (continued)		
F. Combustion Control at Minor Sources in Ozone Nonattainment Areas - Boilers, Process Heaters, Stationary Engines and Gas Turbines (continued)		
4.	The application area is located in the Dallas/Fort Worth Eight-Hour area (except for Wise County) and has units that qualify for an exemption under 30 TAC § 117.2103.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
5.	The application area has units subject to the emission specifications under 30 TAC §§ 117.2010 or 30 TAC § 117.2110.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
6.	The application area has a unit that has been approved for alternative case specific specifications (ACSS) in 30 TAC § 117.2025 or 30 TAC § 117.2125. <i>If the response to Question IV.F.6 is "NO," go to Section IV.G.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
7.	An ACSS for carbon monoxide (CO) has been approved?	<input type="checkbox"/> YES <input type="checkbox"/> NO
8.	An ACSS for ammonia (NH ₃) has been approved?	<input type="checkbox"/> YES <input type="checkbox"/> NO
9.	Provide the Permit Number(s) and authorization/issuance date(s) of the NSR project(s) that incorporates an ACSS below.	
G. Utility Electric Generation in East and Central Texas		
1.	The application area includes utility electric power boilers and/or stationary gas turbines (including duct burners used in turbine exhaust ducts) that were placed into service before December 31, 1995. <i>If the response to Question IV.G.1 is "NO," go to Question IV.H.1.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2.	The application area is complying with the System Cap in 30 TAC § 117.3020.	<input type="checkbox"/> YES <input type="checkbox"/> NO
H. Multi-Region Combustion Control - Water Heaters, Small Boilers, and Process Heaters		
1.	The application area includes a manufacturer, distributor, retailer or installer of natural gas fired water heaters, boilers or process heaters with a maximum rated capacity of 2.0 MMBtu/hr or less. <i>If the response to question IV.H.1 is "NO," go to Section V.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2.	All water heaters, boilers or process heaters manufactured, distributed, retailed or installed qualify for an exemption under 30 TAC § 117.3203.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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(p) Form OP-REQ1: Page 16	
V. Title 40 Code of Federal Regulations Part 59 (40 CFR Part 59) - National Volatile Organic Compound Emission Standards for Consumer and Commercial Products	
A. Subpart B - National Volatile Organic Compound Emission Standards for Automobile Refinish Coatings	
1. The application area manufactures automobile refinishing coatings or coating components and sells or distributes these coatings or coating components in the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area imports automobile refinishing coatings or coating components, manufactured on or after January 11, 1999, and sells or distributes these coatings or coating components in the United States. <i>If the responses to Questions V.A.1 and V.A.2 are both "NO," go to Section V.B.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. All automobile refinishing coatings or coating components manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR § 59.100(c)(1) - (6).	<input type="checkbox"/> YES <input type="checkbox"/> NO
B. Subpart C - National Volatile Organic Compound Emission Standards for Consumer Products	
1. The application area manufactures consumer products for sale or distribution in the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area imports consumer products manufactured on or after December 10, 1998 and sells or distributes these consumer products in the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area is a distributor of consumer products whose name appears on the label of one or more of the products. <i>If the responses to Questions V.B.1 - V.B.3 are all "NO," go to Section V.C.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
4. All consumer products manufactured, imported, or distributed by the application area meet one or more of the exemptions specified in 40 CFR § 59.201(c)(1) - (7).	<input type="checkbox"/> YES <input type="checkbox"/> NO

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(q) Form OP-REQ1: Page 17	
V. Title 40 Code of Federal Regulations Part 59 (40 CFR Part 59) - National Volatile Organic Compound Emission Standards for Consumer and Commercial Products (continued)	
C. Subpart D - National Volatile Organic Compound Emission Standards for Architectural Coatings	
1. The application area manufactures or imports architectural coatings for sale or distribution in the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area manufactures or imports architectural coatings that are registered under the Federal Insecticide, Fungicide, and Rodenticide Act. <i>If the responses to Questions V.C.1-2 are both "NO," go to Section V.D.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. All architectural coatings manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR §59.400(c)(1)-(5).	<input type="checkbox"/> YES <input type="checkbox"/> NO
D. Subpart E - National Volatile Organic Compound Emission Standards for Aerosol Coatings	
1. The application area manufactures or imports aerosol coating products for sale or distribution in the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area is a distributor of aerosol coatings for resale or distribution in the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
E. Subpart F - Control of Evaporative Emissions From New and In-Use Portable Fuel Containers	
1. The application area manufactures or imports portable fuel containers for sale or distribution in the United States. <i>If the response to Question V.E.1 is "NO," go to Section VI.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. All portable fuel containers manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR § 59.605(a) - (c).	<input type="checkbox"/> YES <input type="checkbox"/> NO
VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards	
A. Applicability	
1. The application area includes a unit(s) that is subject to one or more 40 CFR Part 60 subparts. <i>If the response to Question VI.A.1 is "NO," go to Section VII.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

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(r) Form OP-REQ1: Page 18	
VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)	
B. Subpart Y - Standards of Performance for Coal Preparation and Processing Plants	
1. The application area is located at a coal preparation and processing plant. <i>If the response to Question VI.B.1 is "NO," go to Section VI.C.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The coal preparation and processing plant has a design capacity greater than 200 tons per day (tpd). <i>If the response to Question VI.B.2 is "NO," go to Section VI.C.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The plant has an option to enforceably limit its operating level to less than 200 tpd and is choosing this option. <i>If the response to Question VI.B.3 is "YES," go to Section VI.C.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The plant contains an open storage pile, as defined in § 60.251, as an affected facility. <i>If the response to Question VI.B.4 is "NO," go to Section VI.C.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The open storage pile was constructed, reconstructed or modified after May 27, 2009.	<input type="checkbox"/> YES <input type="checkbox"/> NO
C. Subpart GG - Standards of Performance for Stationary Gas Turbines (GOP applicants only)	
1. The application area includes one or more stationary gas turbines that have a heat input at peak load greater than or equal to 10 MMBtu/hr (10.7GJ/hr), based on the lower heating value of the fuel fired. <i>If the response to Question VI.C.1 is "NO" or "N/A," go to Section VI.D.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
2. One or more of the affected facilities were constructed, modified, or reconstructed after October 3, 1977 and prior to February 19, 2005. <i>If the response to Question VI.C.2 is "NO," go to Section VI.D.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. One or more stationary gas turbines in the application area are using a previously approved alternative fuel monitoring schedule as specified in 40 CFR § 60.334(h)(4).	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The exemption specified in 40 CFR § 60.332(e) is being utilized for one or more stationary gas turbines in the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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(s) Form OP-REQ1: Page 19	
VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)	
C. Subpart GG - Standards of Performance for Stationary Gas Turbines (GOP applicants only) (continued)	
5.	<div style="display: flex; justify-content: space-between;"> <div style="width: 80%;"> <p>One or more stationary gas turbines subject to 40 CFR Part 60, Subpart GG in the application area is injected with water or steam for the control of nitrogen oxides.</p> </div> <div style="width: 15%;"> <input type="checkbox"/> YES <input type="checkbox"/> NO </div> </div>
D. Subpart XX - Standards of Performance for Bulk Gasoline Terminals	
1.	<div style="display: flex; justify-content: space-between;"> <div style="width: 80%;"> <p>The application area includes bulk gasoline terminal loading racks. <i>If the response to Question VI.D.1 is "NO," go to Section VI.E.</i></p> </div> <div style="width: 15%;"> <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A </div> </div>
2.	<div style="display: flex; justify-content: space-between;"> <div style="width: 80%;"> <p>One or more of the loading racks were constructed or modified after December 17, 1980, and are not subject to 40 CFR Part 63, Subpart CC.</p> </div> <div style="width: 15%;"> <input type="checkbox"/> YES <input type="checkbox"/> NO </div> </div>
E. Subpart LLL - Standards of Performance for Onshore Natural Gas Processing: Sulfur Dioxide (SO₂) Emissions	
1.	<div style="display: flex; justify-content: space-between;"> <div style="width: 80%;"> <p>The application area includes affected facilities identified in 40 CFR § 60.640(a) that process natural gas (onshore). <i>For SOP applications, if the response to Question VI.E.1 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.1 is "NO" or "N/A," go to Section VI.H.</i></p> </div> <div style="width: 15%;"> <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO </div> </div>
2.	<div style="display: flex; justify-content: space-between;"> <div style="width: 80%;"> <p>The affected facilities commenced construction or modification after January 20, 1984 and on or before August 23, 2011. <i>For SOP applications, if the response to Question VI.E.2 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.2 is "NO," go to Section VI.H.</i></p> </div> <div style="width: 15%;"> <input type="checkbox"/> YES <input type="checkbox"/> NO </div> </div>
3.	<div style="display: flex; justify-content: space-between;"> <div style="width: 80%;"> <p>The application area includes a gas sweetening unit with a design capacity greater than or equal to 2 long tons per day (LTPD) of hydrogen sulfide but operates at less than 2 LTPD. <i>For SOP applications, if the response to Question VI.E.3 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.3 is "NO," go to Section VI.H.</i></p> </div> <div style="width: 15%;"> <input type="checkbox"/> YES <input type="checkbox"/> NO </div> </div>

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(t) Form OP-REQ1: Page 20	
VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)	
E. Subpart LLL - Standards of Performance for Onshore Natural Gas Processing: Sulfur Dioxide (SO₂) Emissions (continued)	
4.	Federally enforceable operating limits have been established in the preconstruction authorization limiting the gas sweetening unit to less than 2 LTPD. <i>For SOP applications, if the response to Question VI.E.4. is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.4. is "NO," go to Section VI.H.</i>
	<input type="checkbox"/> YES <input type="checkbox"/> NO
5.	Please provide the Unit ID(s) for the gas sweetening unit(s) that have established federally enforceable operating limits in the space provided below.
F. Subpart OOO - Standards of Performance for Nonmetallic Mineral Processing Plants	
1.	The application area includes affected facilities identified in 40 CFR § 60.670(a)(1) that are located at a fixed or portable nonmetallic mineral processing plant. <i>If the response to Question VI.F.1 is "NO," go to Section VI.G.</i>
	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2.	Affected facilities identified in 40 CFR § 60.670(a)(1) and located in the application area are subject to 40 CFR Part 60, Subpart OOO.
	<input type="checkbox"/> YES <input type="checkbox"/> NO
G. Subpart QQQ - Standards of Performance for VOC Emissions from Petroleum Refinery Wastewater Systems	
1.	The application area is located at a petroleum refinery and includes one or more of the affected facilities identified in 40 CFR § 60.690(a)(2) - (4) for which construction, modification, or reconstruction was commenced after May 4, 1987. <i>If the response to Question VI.G.1 is "NO," go to Section VI.H.</i>
	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2.	The application area includes storm water sewer systems.
	<input type="checkbox"/> YES <input type="checkbox"/> NO

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(u) Form OP-REQ1: Page 21	
VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)	
G. Subpart QQQ - Standards of Performance for VOC Emissions from Petroleum Refinery Wastewater Systems (continued)	
3. The application area includes ancillary equipment which is physically separate from the wastewater system and does not come in contact with or store oily wastewater.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes non-contact cooling water systems.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes individual drain systems. <i>If the response to Question VI.G.5 is "NO," go to Section VI.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes one or more individual drain systems that meet the exemption specified in 40 CFR § 60.692-2(d).	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes completely closed drain systems.	<input type="checkbox"/> YES <input type="checkbox"/> NO
H. Subpart AAAA - Standards of Performance for Small Municipal Waste Incineration Units for Which Construction Commenced After August 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 6, 2004	
1. The application area includes at least one small municipal waste incineration unit, other than an air curtain incinerator. <i>If the response to Question VI.H.1. is "N/A," go to Section VI.I. If the response to Question VI.H.1 is "NO," go to Question VI.H.4.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area includes at least one small municipal waste incineration unit, other than an air curtain incinerator, constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes at least one small municipal waste incineration unit, other than an air curtain incinerator, constructed before August 30, 1999 and not modified or reconstructed on or after June 6, 2006.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes at least one air curtain incinerator. <i>If the response to Question VI.H.4 is "NO," go to Section VI.I.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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(v) Form OP-REQ1: Page 22		
VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)		
H. Subpart AAAA - Standards of Performance for Small Municipal Waste Incineration Units for Which Construction Commenced After August 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 6, 2004 (continued)		
5.	The application area includes at least one air curtain incinerator constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006. <i>If the response to Question VI.H.5 is "NO," go to Question VI.H.7.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
6.	All air curtain incinerators constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006 combust only yard waste.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7.	The application area includes at least one air curtain incinerator constructed before August 30, 1999 and not modified or reconstructed on or after June 6, 2006.	<input type="checkbox"/> YES <input type="checkbox"/> NO
8.	All air curtain incinerators constructed before August 30, 1999 and not modified or reconstructed on or after June 6, 2006 combust only yard waste.	<input type="checkbox"/> YES <input type="checkbox"/> NO
I. Subpart CCCC - Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction Commenced After November 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 1, 2001		
1.	The application area includes at least one commercial or industrial solid waste incineration unit, other than an air curtain incinerator. <i>If the response to Question VI.I.1 is "N/A," go to Section VI.J. If the response to Question VI.I.1 is "NO," go to Question VI.I.4.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2.	The application area includes at least one commercial or industrial solid waste incineration unit, other than an air curtain incinerator, constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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(w) Form OP-REQ1: Page 23	
VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)	
I. Subpart CCCC - Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction Commenced After November 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 1, 2001 (continued)	
3.	The application area includes at least one commercial or industrial solid waste incineration unit, other than an air curtain incinerator, constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001. <input type="checkbox"/> YES <input type="checkbox"/> NO
4.	The application area includes at least one air curtain incinerator. <i>If the response to Question VI.I.4 is "NO," go to Section VI.J.</i> <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
5.	The application area includes at least one air curtain incinerator, constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001. <i>If the response to Question VI.I.5 is "NO," go to VI.I.7.</i> <input type="checkbox"/> YES <input type="checkbox"/> NO
6.	All air curtain incinerators constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001 combust only wood waste, clean lumber, or yard waste or a mixture of these materials. <input type="checkbox"/> YES <input type="checkbox"/> NO
7.	The application area includes at least one air curtain incinerator, constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001. <input type="checkbox"/> YES <input type="checkbox"/> NO
8.	All air curtain incinerators constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001 combust only wood waste, clean lumber, or yard waste or a mixture of these materials. <input type="checkbox"/> YES <input type="checkbox"/> NO

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(x) Form OP-REQ1: Page 24	
VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)	
J. Subpart EEEE - Standards of Performance for Other Solid Waste Incineration Units for Which Construction Commenced After December 9, 2004 or for Which Modification or Reconstruction Commenced on or After June 16, 2006	
1. The application area includes at least one very small municipal waste incineration unit or institutional incineration unit, other than an air curtain incinerator. <i>If the response to Question VI.J.1 is "N/A," go to Section VI.K. If the response to Question VI.J.1 is "NO," go to Question VI.J.4.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area includes at least one very small municipal waste incineration unit, other than an air curtain incinerator, constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes at least one very small municipal waste incineration unit, other than an air curtain incinerator, constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes at least one air curtain incinerator. <i>If the response to Question VI.J.4 is "NO," go to Section VI.K.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
5. The application area includes at least one air curtain incinerator constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006. <i>If the response to Question VI.J.5 is "NO," go to Question VI.J.7.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. All air curtain incinerators constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes at least one air curtain incinerator constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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(y) Form OP-REQ1: Page 25	
VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (NSPS) (continued)	
J. Subpart EEEE - Standards of Performance for Other Solid Waste Incineration Units for Which Construction Commenced After December 9, 2004 or for Which Modification or Reconstruction Commenced on or After June 16, 2006 (continued)	
8.	All air curtain incinerators constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.
<input type="checkbox"/> YES <input type="checkbox"/> NO	
9.	The air curtain incinerator is located at an institutional facility and is a distinct operating unit of the institutional facility that generated the waste.
<input type="checkbox"/> YES <input type="checkbox"/> NO	
10.	The air curtain incinerator burns less than 35 tons per day of wood waste, clean lumber, or yard waste or a mixture of these materials.
<input type="checkbox"/> YES <input type="checkbox"/> NO	
K. Subpart OOOO - Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution	
1.	The application area includes one or more of the onshore affected facilities listed in 40 CFR § 60.5365(a)-(g) that are subject to 40 CFR Part 60, Subpart OOOO.
<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants	
A. Applicability	
1.	The application area includes a unit(s) that is subject to one or more 40 CFR Part 61 subparts. <i>If the response to Question VII.A.1 is "NO" or "N/A," go to Section VIII.</i>
<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	
B. Subpart F - National Emission Standard for Vinyl Chloride	
1.	The application area is located at a plant which produces ethylene dichloride by reaction of oxygen and hydrogen chloride with ethylene, vinyl chloride by any process, and/or one or more polymers containing any fraction of polymerized vinyl chloride.
<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
C. Subpart J - National Emission Standard for Benzene Emissions for Equipment Leaks (Fugitive Emission Sources) of Benzene (Complete this section for GOP applications only)	
1.	The application area includes equipment in benzene service.
<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A	

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(z) Form OP-REQ1: Page 26	
VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)	
D. Subpart L - National Emission Standard for Benzene Emissions from Coke By-Product Recovery Plants	
1. The application area is located at a coke by-product recovery plant and includes one or more of the affected sources identified in 40 CFR § 61.130(a) - (b). <i>If the response to Question VII.D.1 is "NO," go to Section VII.E.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes equipment in benzene service as determined by 40 CFR § 61.137(b).	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area has elected to comply with the provisions of 40 CFR § 61.243-1 and 40 CFR § 61.243-2.	<input type="checkbox"/> YES <input type="checkbox"/> NO
E. Subpart M - National Emission Standard for Asbestos	
Applicability	
1. The application area includes sources, operations, or activities specified in 40 CFR §§ 61.143, 61.144, 61.146, 61.147, 61.148, or 61.155. <i>If the response to Question VII.E.1 is "NO," go to Section VII.F.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Roadway Construction	
2. The application area includes roadways constructed or maintained with asbestos tailings or asbestos-containing waste material.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Manufacturing Commercial Asbestos	
3. The application area includes a manufacturing operation using commercial asbestos. <i>If the response to Question VII.E.3 is "NO," go to Question VII.E.4.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
a. Visible emissions are discharged to outside air from the manufacturing operation	<input type="checkbox"/> YES <input type="checkbox"/> NO
b. An alternative emission control and waste treatment method is being used that has received prior U.S. Environmental Protection Agency (EPA) approval.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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(aa) Form OP-REQ1: Page 27	
VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)	
E. Subpart M - National Emission Standard for Asbestos (continued)	
<i>Manufacturing Commercial Asbestos (continued)</i>	
c. Asbestos-containing waste material is processed into non-friable forms.	<input type="checkbox"/> YES <input type="checkbox"/> NO
d. Asbestos-containing waste material is adequately wetted.	<input type="checkbox"/> YES <input type="checkbox"/> NO
e. Alternative filtering equipment is being used that has received EPA approval.	<input type="checkbox"/> YES <input type="checkbox"/> NO
f. A high efficiency particulate air (HEPA) filter is being used that is certified to be at least 99.97% efficient for 0.3 micron particles	<input type="checkbox"/> YES <input type="checkbox"/> NO
g. The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<i>Asbestos Spray Application</i>	
4. The application area includes operations in which asbestos-containing materials are spray applied. <i>If the response to Question VII.E.4 is "NO," go to Question VII.E.5.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
a. Asbestos fibers are encapsulated with a bituminous or resinous binder during spraying and are not friable after drying. <i>If the response to Question VII.E.4.a is "YES," go to Question VII.E.5.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
b. Spray-on applications on buildings, structures, pipes, and conduits do not use material containing more than 1% asbestos.	<input type="checkbox"/> YES <input type="checkbox"/> NO
c. An alternative emission control and waste treatment method is being used that has received prior EPA approval.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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(bb) Form OP-REQ1: Page 28	
VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)	
E. Subpart M - National Emission Standard for Asbestos (continued)	
<i>Asbestos Spray Application (continued)</i>	
d. Asbestos-containing waste material is processed into non-friable forms.	<input type="checkbox"/> YES <input type="checkbox"/> NO
e. Asbestos-containing waste material is adequately wetted.	<input type="checkbox"/> YES <input type="checkbox"/> NO
f. Alternative filtering equipment is being used that has received EPA approval.	<input type="checkbox"/> YES <input type="checkbox"/> NO
g. A HEPA filter is being used that is certified to be at least 99.97% efficient for 0.3 micron particles.	<input type="checkbox"/> YES <input type="checkbox"/> NO
h. The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<i>Fabricating Commercial Asbestos</i>	
5. The application area includes a fabricating operation using commercial asbestos. <i>If the response to Question VII.E.5 is "NO," go to Question VII.E.6.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
a. Visible emissions are discharged to outside air from the manufacturing operation.	<input type="checkbox"/> YES <input type="checkbox"/> NO
b. An alternative emission control and waste treatment method is being used that has received prior EPA approval.	<input type="checkbox"/> YES <input type="checkbox"/> NO
c. Asbestos-containing waste material is processed into non-friable forms.	<input type="checkbox"/> YES <input type="checkbox"/> NO
d. Asbestos-containing waste material is adequately wetted.	<input type="checkbox"/> YES <input type="checkbox"/> NO
e. Alternative filtering equipment is being used that has received EPA approval.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)	
E. Subpart M - National Emission Standard for Asbestos (continued)	
<i>Fabricating Commercial Asbestos (continued)</i>	
f. A HEPA filter is being used that is certified to be at least 99.97% efficient for 0.3 micron particles.	<input type="checkbox"/> YES <input type="checkbox"/> NO
g. The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<i>Non-sprayed Asbestos Insulation</i>	
6. The application area includes insulating materials (other than spray applied insulating materials) that are either molded and friable or wet-applied and friable after drying.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<i>Asbestos Conversion</i>	
7. The application area includes operations that convert regulated asbestos-containing material and asbestos-containing waste material into nonasbestos (asbestos-free) material.	<input type="checkbox"/> YES <input type="checkbox"/> NO
F. Subpart P - National Emission Standard for Inorganic Arsenic Emissions from Arsenic Trioxide and Metallic Arsenic Production Facilities	
1. The application area is located at a metallic arsenic production plant or at an arsenic trioxide plant that processes low-grade arsenic bearing materials by a roasting condensation process.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
G. Subpart BB - National Emission Standard for Benzene Emissions from Benzene Transfer Operations	
1. The application area is located at a benzene production facility and/or bulk terminal. <i>If the response to Question VII.G.1 is "NO," go to Section VII.H.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes benzene transfer operations at marine vessel loading racks.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)	
G. Subpart BB - National Emission Standard for Benzene Emissions from Benzene Transfer Operations (continued)	
3. The application area includes benzene transfer operations at railcar loading racks.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes benzene transfer operations at tank-truck loading racks.	<input type="checkbox"/> YES <input type="checkbox"/> NO
H. Subpart FF - National Emission Standard for Benzene Waste Operations	
<i>Applicability</i>	
1. The application area includes a chemical manufacturing plant, coke by-product recovery plant, or petroleum refinery facility as defined in § 61.341.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area is located at a hazardous waste treatment, storage, and disposal (TSD) facility site as described in 40 CFR § 61.340(b). <i>If the responses to Questions VII.H.1 and VII.H.2 are both "NO," go to Section VIII.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area is located at a site that has no benzene onsite in wastes, products, byproducts, or intermediates. <i>If the response to Question VII.H.3 is "YES," go to Section VIII.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area is located at a site having a total annual benzene quantity from facility waste less than 1 megagram per year (Mg/yr). <i>If the response to Question VII.H.4 is "YES," go to Section VIII</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area is located at a site having a total annual benzene quantity from facility waste greater than or equal to 1 Mg/yr but less than 10 Mg/yr. <i>If the response to Question VII.H.5 is "YES," go to Section VIII.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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(ee) Form OP-REQ1: Page 31	
VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)	
H. Subpart FF - National Emission Standard for Benzene Waste Operations (continued)	
Applicability (continued)	
6. The flow-weighted annual average benzene concentration of each waste stream at the site is based on documentation.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area has waste streams with flow-weighted annual average water content of 10% or greater.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Waste Stream Exemptions	
8. The application area has waste streams that meet the exemption specified in 40 CFR § 61.342(c)(2) (the flow-weighted annual average benzene concentration is less than 10 ppmw).	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. The application area has waste streams that meet the exemption specified in 40 CFR § 61.342(c)(3) because process wastewater has a flow rate less than 0.02 liters per minute or an annual wastewater quantity less than 10 Mg/yr.	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The application area has waste streams that meet the exemption specified in 40 CFR § 61.342(c)(3) because the total annual benzene quantity is less than or equal to 2 Mg/yr.	<input type="checkbox"/> YES <input type="checkbox"/> NO
11. The application area transfers waste off-site for treatment by another facility.	<input type="checkbox"/> YES <input type="checkbox"/> NO
12. The application area is complying with 40 CFR § 61.342(d).	<input type="checkbox"/> YES <input type="checkbox"/> NO
13. The application area is complying with 40 CFR § 61.342(e). <i>If the response to Question VII.H.13 is "NO," go to Question VII.H.15.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
14. The application area has facility waste with a flow weighted annual average water content of less than 10%.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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(ff) Form OP-REQ1: Page 32	
VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)	
H. Subpart FF - National Emission Standard for Benzene Waste Operations (continued)	
Container Requirements	
15. The application area has containers, as defined in 40 CFR § 61.341, that receive non-exempt benzene waste. <i>If the response to Question VII.H.15 is "NO," go to Question VII.H.18.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
16. The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers. <i>If the response to Question VII.H.16 is "YES," go to Question VII.H.18.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
17. Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Individual Drain Systems	
18. The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage non-exempt benzene waste. <i>If the response to Question VII.H.18 is "NO," go to Question VII.H.25.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
19. The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. <i>If the response to Question VII.H.19 is "YES," go to Question VII.H.25.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
20. The application area has individual drain systems complying with 40 CFR § 61.346(a). <i>If the response to Question VII.H.20 is "NO," go to Question VII.H.22.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
21. Covers and closed-vent systems used for individual drain systems operate such that the individual drain system is maintained at a pressure less than atmospheric pressure.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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(gg) Form OP-REQ1: Page 33	
VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)	
H. Subpart FF - National Emission Standard for Benzene Waste Operations (continued)	
Individual Drain Systems (continued)	
22. The application area has individual drain systems complying with 40 CFR § 61.346(b). <i>If the response to Question VII.H.22 is "NO," go to Question VII.H.25.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
23. Junction boxes in the individual drain systems are equipped with a system to prevent the flow of organic vapors from the junction box vent pipe to the atmosphere during normal operation.	<input type="checkbox"/> YES <input type="checkbox"/> NO
24. Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Remediation Activities	
25. Remediation activities take place at the application area subject to 40 CFR Part 61, Subpart FF.	<input type="checkbox"/> YES <input type="checkbox"/> NO
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories	
A. Applicability	
1. The application area includes a unit(s) that is subject to one or more 40 CFR Part 63 subparts other than subparts made applicable by reference under subparts in 40 CFR Part 60, 61 or 63. <i>See instructions for 40 CFR Part 63 subparts made applicable only by reference.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
B. Subpart F - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry	
1. The application area is located at a plant site that is a major source as defined in the Federal Clean Air Act § 112(a). <i>If the response to Question VIII.B.1 is "NO," go to Section VIII.D.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

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(hh) Form OP-REQ1: Page 34	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
B. Subpart F - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry (continued)	
2. The application area is located at a site that includes at least one chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii). <i>If the response to Question VIII.B.2 is "NO," go to Section VIII.D.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area is located at a site that includes at least one chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii) and uses as a reactant or manufactures as a product, or co-product, one or more of the organic hazardous air pollutants listed in table 2 of 40 CFR Part 63, Subpart F.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes a chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii) and uses as a reactant or manufactures as a product, or co-product, one or more of the organic hazardous air pollutants listed in table 2 of 40 CFR Part 63, Subpart F.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes a chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii) and does <u>not</u> use as a reactant or manufacture as a product, or co-product, one or more of the organic hazardous air pollutants listed in table 2 of 40 CFR Part 63, Subpart F. <i>If the response to Questions VIII.B.3, B.4 and B.5 are all "NO," go to Section VIII.D.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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(ii) Form OP-REQ1: Page 35	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater	
Applicability	
1. The application area is located at a site that is subject to 40 CFR 63, Subpart F and the application area includes process vents, storage vessels, transfer racks, or waste streams associated with a chemical manufacturing process subject to 40 CFR 63, Subpart F. <i>If the response to Question VIII.C.1 is "NO," go to Section VIII.D.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area includes fixed roofs, covers, and/or enclosures that are required to comply with 40 CFR § 63.148.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes vapor collection systems or closed-vent systems that are required to comply with 40 CFR § 63.148. <i>If the response to Question VIII.C.3 is "NO," go to Question VIII.C.8.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes vapor collection systems or closed-vent systems that are constructed of hard-piping.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes vapor collection systems or closed-vent systems that contain bypass lines that could divert a vent stream away from a control device and to the atmosphere. <i>If the response to Question VIII.C.5 is "NO," go to Question VIII.C.8.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
Vapor Collection and Closed Vent Systems	
6. Flow indicators are installed, calibrated, maintained, and operated at the entrances to bypass lines in the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. Bypass lines in the application area are secured in the closed position with a car-seal or a lock-and-key type configuration.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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(jj) Form OP-REQ1: Page 36	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)	
<i>Reloading or Cleaning of Railcars, Tank Trucks, or Barges</i>	
8. The application area includes reloading and/or cleaning of railcars, tank trucks, or barges that deliver HAPs to a storage tank. <i>If the response to Question VIII.C.8 is "NO," go to Question VIII.C.11.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. The application area includes operations that are complying with § 63.119(g)(6) through the use of a closed-vent system with a control device used to reduce inlet emissions of HAPs by at least 95 percent by weight or greater.	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The application area includes operations that are complying with § 63.119(g)(6) through the use of a vapor balancing system.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<i>Transfer Racks</i>	
11. The application area includes Group 1 transfer racks that load organic HAPs.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<i>Process Wastewater Streams</i>	
12. The application area includes process wastewater streams. <i>If the response to Question VIII.C.12 is "NO," go to Question VIII.C.34.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
13. The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Part 61, Subpart FF. <i>If the response to Question VIII.C.13 is "NO," go to Question VIII.C.15.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
14. The application area includes process wastewater streams that are complying with 40 CFR §§ 63.110(e)(1)(i) and (e)(1)(ii).	<input type="checkbox"/> YES <input type="checkbox"/> NO
15. The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Part 61, Subpart F. <i>If the response to Question VIII.C.15 is "NO," go to Question VIII.C.17.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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(kk) Form OP-REQ1: Page 37	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)	
<i>Process Wastewater Streams (continued)</i>	
16. The application area includes process wastewater streams utilizing the compliance option specified in 40 CFR § 63.110(f)(4)(ii).	<input type="checkbox"/> YES <input type="checkbox"/> NO
17. The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Parts 260 through 272. <i>If the response to Question VIII.C.17 is "NO," go to Question VIII.C.20.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
18. The application area includes process wastewater streams complying with 40 CFR § 63.110(e)(2)(i).	<input type="checkbox"/> YES <input type="checkbox"/> NO
19. The application are includes process wastewater streams complying with 40 CFR § 63.110(e)(2)(ii).	<input type="checkbox"/> YES <input type="checkbox"/> NO
20. The application area includes process wastewater streams, located at existing sources, that are designated as Group 1; are required to be treated as Group 1 under 40 CFR § 63.110; or are determined to be Group 1 for Table 9 compounds.	<input type="checkbox"/> YES <input type="checkbox"/> NO
21. The application area includes process wastewater streams, located at existing sources that are Group 2.	<input type="checkbox"/> YES <input type="checkbox"/> NO
22. The application area includes process wastewater streams, located at new sources, that are designated as Group 1; required to be treated as Group 1 under 40 CFR § 63.110; or are determined to be Group 1 for Table 8 or Table 9 compounds.	<input type="checkbox"/> YES <input type="checkbox"/> NO
23. The application area includes process wastewater streams, located at new sources that are Group 2 for both Table 8 and Table 9 compounds.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)	
Process Wastewater Streams (continued)	
24. All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.C.24 is "YES," go to Question VIII.C.34.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
25. The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.C.25 is "NO," go to Question VIII.C.27.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
26. The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	<input type="checkbox"/> YES <input type="checkbox"/> NO
27. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	<input type="checkbox"/> YES <input type="checkbox"/> NO
28. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.C.27 - VIII.C.28 are both "NO," go to Question VIII.C.30.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
29. The application area includes waste management units that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	<input type="checkbox"/> YES <input type="checkbox"/> NO
30. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)	
<i>Drains</i>	
31. The application area includes individual drain systems that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream. <i>If the response to Question VIII.C.31 is "NO," go to Question VIII.C.34.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
32. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	<input type="checkbox"/> YES <input type="checkbox"/> NO
33. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	<input type="checkbox"/> YES <input type="checkbox"/> NO
34. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of a chemical manufacturing process unit that meets the criteria of 40 CFR § 63.100(b). <i>If the response to Question VIII.C.34 is "NO," go to Question VIII.C.39.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
35. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes (that are part of a chemical manufacturing process unit) that meet the criteria listed in 40 CFR § 63.149(d). <i>If the response to Question VIII.C.35 is "NO," go to Question VIII.C.39.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
36. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds listed in 40 CFR Part 63 Subpart G, Table 9, at any flow rate.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
C. Subpart G-National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operation, and Wastewater (continued)	
Drains (continued)	
37. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds listed in 40 CFR Part 63 Subpart G, Table 9, at an annual average flow rate greater than or equal to 10 liters per minute.	<input type="checkbox"/> YES <input type="checkbox"/> NO
38. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of a chemical manufacturing process unit that is subject to the new source requirements of 40 CFR § 63.100(l)(1) or (l)(2); and the equipment conveys water with a total annual average concentration greater than or equal to 10 parts per million by weight of compounds listed in 40 CFR Part 63 Subpart G, Table 8, at an average annual flow rate greater than or equal to 0.02 liter per minute.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Gas Streams	
39. The application area includes gas streams meeting the characteristics of 40 CFR § 63.107(b) - (h) or the criteria of 40 CFR § 63.113(i) and are transferred to a control device not owned or operated by the applicant.	<input type="checkbox"/> YES <input type="checkbox"/> NO
40. The applicant is unable to comply with 40 CFR §§ 63.113 - 63.118 for one or more reasons described in 40 CFR § 63.100(q)(1), (3), or (5).	<input type="checkbox"/> YES <input type="checkbox"/> NO
D. Subpart N - National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks	
1. The application area includes chromium electroplating or chromium anodizing tanks located at hard chromium electroplating, decorative chromium electroplating, and/or chromium anodizing operations.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
E. Subpart O - Ethylene Oxide Emissions Standards for Sterilization Facilities	
1. The application area includes sterilization facilities where ethylene oxide is used in the sterilization or fumigation of materials. <i>If the response to Question VIII.E.1 is "NO," go to Section VIII.F.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. Sterilization facilities located in the application area are subject to 40 CFR Part 63, Subpart O. <i>If the response to Question VIII.E.2 is "NO," go to Section VIII.F.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The sterilization source has used less than 1 ton (907 kg) of ethylene oxide within all consecutive 12-month periods after December 6, 1996.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The sterilization source has used less than 10 tons (9070 kg) of ethylene oxide within all consecutive 12-month periods after December 6, 1996.	<input type="checkbox"/> YES <input type="checkbox"/> NO
F. Subpart Q - National Emission Standards for Industrial Process Cooling Towers	
1. The application area includes industrial process cooling towers. <i>If the response to Question VIII.F.1 is "NO," go to Section VIII.G.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. Chromium-based water treatment chemicals have been used on or after September 8, 1994.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
G. Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)	
1. The application area includes a bulk gasoline terminal.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes a pipeline breakout station. <i>If the responses to Questions VIII.G.1 and VIII.G.2 are both "NO," go to Section VIII.H.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The bulk gasoline terminal or pipeline breakout station is located within a contiguous area and under common control with another bulk gasoline terminal or a pipeline breakout station. <i>If the response to Question VIII.G.3 is "YES," go to Question VIII.G.10.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
G. Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) (continued)	
4. The bulk gasoline terminal or pipeline breakout station is located within a contiguous area and under common control with sources, other than bulk gasoline terminals or pipeline breakout stations that emit or have the potential to emit HAPs. <i>If the response to Question VIII.G.4 is "YES," go to Question VIII.G.10.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. An emissions screening factor was calculated for the bulk gasoline terminal or pipeline breakout station. <i>If the response to Question VIII.G.5 is "NO," go to Question VIII.G.10.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The value 0.04(OE) is less than 5% of the value of the bulk gasoline terminal emissions screening factor (ET) or the pipeline breakout station emissions screening factor (Ep). <i>If the response to Question VIII.G.6 is "NO," go to Question VIII.G.10.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. Emissions screening factor less than 0.5 (ET or EP < 0.5). <i>If the response to Question VIII.G.7 is "YES," go to Section VIII.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. Emissions screening factor greater than or equal to 0.5, but less than 1.0 (0.5 ≤ ET or EP < 1.0). <i>If the response to Question VIII.G.8 is "YES," go to Section VIII.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. Emissions screening factor greater than or equal to 1.0 (ET or EP ≥ 1.0). <i>If the response to Question VIII.G.9 is "YES," go to Question VIII.G.11.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The site at which the application area is located is a major source of HAP. <i>If the response to Question VIII.G.10 is "NO," go to Section VIII.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
11. The application area is using an alternative leak monitoring program as described in 40 CFR § 63.424(f).	<input type="checkbox"/> YES <input type="checkbox"/> NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
H. Subpart S - National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry	
1. The application area includes processes that produce pulp, paper, or paperboard and are located at a plant site that is a major source of HAPs as defined in 40 CFR § 63.2. <i>If the response to Question VIII.H.1 is "NO," go to Section VIII.I.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area uses processes and materials specified in 40 CFR § 63.440(a)(1) - (3). <i>If the response to Question VIII.H.2 is "NO," go to Section VIII.I.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes one or more sources subject to 40 CFR Part 63, Subpart S that are existing sources. <i>If the response to Question VIII.H.3 is "NO," go to Section VIII.I.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes one or more kraft pulping systems that are existing sources.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes one or more dissolving-grade bleaching systems that are existing sources at a kraft or sulfite pulping mill.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes bleaching systems that are existing sources and are complying with the Voluntary Advanced Technology Incentives Program for Effluent Limitation Guidelines in 40 CFR § 430.24. <i>If the response to Question VIII.H.6 is "NO," go to Section VIII.I.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes bleaching systems that are complying with 40 CFR § 63.440(d)(3)(i).	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. The application area includes bleaching systems that are complying with 40 CFR § 63.440(d)(3)(ii).	<input type="checkbox"/> YES <input type="checkbox"/> NO

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(rr) Form OP-REQ1: Page 44	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
I. Subpart T - National Emission Standards for Halogenated Solvent Cleaning	
1. The application area includes an individual batch vapor, in-line vapor, in-line cold, and/or batch cold solvent cleaning machine that uses a hazardous air pollutant (HAP) solvent, or any combination of halogenated HAP solvents, in a total concentration greater than 5% by weight, as a cleaning and/or drying agent.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area is located at a major source and includes solvent cleaning machines, qualifying as affected facilities, that use perchloroethylene, trichloroethylene or methylene chloride.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area is located at an area source and includes solvent cleaning machines, other than cold batch cleaning machines, that use perchloroethylene, trichloroethylene or methylene chloride.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins	
1. The application area includes elastomer product process units and/or wastewater streams and wastewater operations that are associated with elastomer product process units. <i>If the response to Question VIII.J.1 is "NO," go to Section VIII.K.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. Elastomer product process units and/or wastewater streams and wastewater operations located in the application area are subject to 40 CFR Part 63, Subpart U. <i>If the response to Question VIII.J.2 is "NO," go to Section VIII.K.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 for organic HAPs as defined in 40 CFR § 63.482.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes process wastewater streams that are Group 2 for organic HAPs as defined in 40 CFR § 63.482.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins (continued)	
5. All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.J.5 is "YES," go to Question VIII.J.15.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.J.6 is "NO," go to Question VIII.J.8.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.J.8 - VIII.J.9 are both "NO," go to Question VIII.J.11.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins (continued)	
Containers	
11. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Drains	
12. The application area includes individual drain systems that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. <i>If the response to Question VIII.J.12 is "NO," go to Question VIII.J.15.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
13. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	<input type="checkbox"/> YES <input type="checkbox"/> NO
14. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	<input type="checkbox"/> YES <input type="checkbox"/> NO
15. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of an elastomer product process unit. <i>If the response to Question VIII.J.15 is "NO," go to Section VIII.K.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
16. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that meet the criteria listed in 40 CFR § 63.149(d) and § 63.501(a)(12). <i>If the response to Question VIII.J.16 is "NO," go to Section VIII.K.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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(uu) Form OP-REQ1: Page 47	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins (continued)	
Drains (continued)	
17. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.482, at any flow rate.	<input type="checkbox"/> YES <input type="checkbox"/> NO
18. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.482, at an annual average flow rate greater than or equal to 10 liters per minute.	<input type="checkbox"/> YES <input type="checkbox"/> NO
19. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of an elastomer product process unit that is a new affected source or part of a new affected source and the equipment conveys water with a total annual average concentration greater than or equal to 10 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.482, at an average annual flow rate greater than or equal to 0.02 liter per minute.	<input type="checkbox"/> YES <input type="checkbox"/> NO
K. Subpart W - National Emission Standards for Hazardous Air Pollutants for Epoxy Resins Production and Non-nylon Polyamides Production	
1. The manufacture of basic liquid epoxy resins (BLR) and/or manufacture of wet strength resins (WSR) is conducted in the application area. <i>If the response to Question VIII.K.1 is "NO" or "N/A," go to Section VIII.L.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area includes a BLR and/or WSR research and development facility.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
L. Subpart X - National Emission Standards for Hazardous Air Pollutants from Secondary Lead Smelting	
1. The application area includes one or more of the affected sources in 40 CFR § 63.541(a) that are located at a secondary lead smelter. <i>If the response to Question VIII.L.1 is "NO" or "N/A," go to Section VIII.M.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area is using and approved alternate to the requirements of § 63.545(c)(1)-(5) for control of fugitive dust emission sources.	<input type="checkbox"/> YES <input type="checkbox"/> NO
M. Subpart Y - National Emission Standards for Marine Tank Vessel Loading Operations	
1. The application area includes marine tank vessel loading operations that are specified in 40 CFR § 63.560 and located at an affected source as defined in 40 CFR § 63.561.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
N. Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries	
Applicability	
1. The application area includes petroleum refining process units and/or related emission points that are specified in 40 CFR § 63.640(c)(1) - (c)(7). <i>If the response to Question VIII.N.1 is "NO," go to Section VIII.O.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. All petroleum refining process units/and or related emission points within the application area are specified in 40 CFR § 63.640(g)(1) - (g)(7). <i>If the response to Question VIII.N.2 is "YES," go to Section VIII.O.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
N. Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries (continued)	
Applicability (continued)	
3. The application area is located at a plant site that is a major source as defined in the Federal Clean Air Act § 112(a). <i>If the response to Question VIII.N.3 is "NO," go to Section VIII.O.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area is located at a plant site which emits or has equipment containing/contacting one or more of the HAPs listed in table 1 of 40 CFR Part 63, Subpart CC. <i>If the response to Question VIII.N.4 is "NO," go to Section VIII.O.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes Group 1 wastewater streams that are not conveyed, stored, or treated in a wastewater stream management unit that also receives streams subject to the provisions of 40 CFR §§ 63.133 - 63.147 of Subpart G wastewater provisions section.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes Group 2 wastewater streams that are not conveyed, stored, or treated in a wastewater stream management unit that also receives streams subject to the provisions of 40 CFR §§ 63.133 - 63.147 of Subpart G wastewater provisions section.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes Group 1 or Group 2 wastewater streams that are conveyed, stored, or treated in a wastewater stream management unit that also receives streams subject to the provisions of 40 CFR §§ 63.133 - 63.147 of Subpart G wastewater provisions section. <i>If the response to Question VIII.N.7 is "NO," go to Section VIII.O.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. The application area includes Group 1 or Group 2 wastewater streams that are complying with 40 CFR § 63.640(o)(2)(i).	<input type="checkbox"/> YES <input type="checkbox"/> NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
N. Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries (continued)	
Applicability (continued)	
9. The application area includes Group 1 or Group 2 wastewater streams that are complying with 40 CFR § 63.640(o)(2)(ii). <i>If the response to Question VIII.N.9 is "NO," go to Section VIII.O.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The application area includes Group 2 wastewater streams or organic streams whose benzene emissions are subject to control through the use of one or more treatment processes or waste management units under the provisions of 40 CFR Part 61, Subpart FF on or after December 31, 1992.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Containers, Drains, and other Appurtenances	
11. The application area includes containers that are subject to the requirements of 40 CFR § 63.135 as a result of complying with 40 CFR § 63.640(o)(2)(ii).	<input type="checkbox"/> YES <input type="checkbox"/> NO
12. The application area includes individual drain systems that are subject to the requirements of 40 CFR § 63.136 as a result of complying with 40 CFR § 63.640(o)(2)(ii).	<input type="checkbox"/> YES <input type="checkbox"/> NO
O. Subpart DD - National Emission Standards for Off-site Waste and Recovery Operations	
1. The application area receives material that meets the criteria for off-site material as specified in 40 CFR § 63.680(b)(1). <i>If the response to Question VIII.O.1 is "NO" or "N/A," go to Section VIII.P</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. Materials specified in 40 CFR § 63.680(b)(2) are received at the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area has a waste management operation receiving off-site material and is regulated under 40 CFR Part 264 or Part 265.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
O. Subpart DD - National Emission Standards for Off-site Waste and Recovery Operations (continued)	
4. The application area has a waste management operation treating wastewater which is an off-site material and is exempted under 40 CFR §§ 264.1(g)(6) or 265.1(c)(10).	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area has an operation subject to Clean Water Act, § 402 or § 307(b) but is not owned by a "state" or "municipality."	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The predominant activity in the application area is the treatment of wastewater received from off-site.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area has a recovery operation that recycles or reprocesses hazardous waste which is an off-site material and is exempted under 40 CFR §§ 264.1(g)(2) or 265.1(c)(6).	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. The application area has a recovery operation that recycles or reprocesses used solvent which is an off-site material and is not part of a chemical, petroleum, or other manufacturing process that is required to use air emission controls by another subpart of 40 CFR Part 63 or Part 61.	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. The application area has a recovery operation that re-refines or reprocesses used oil which is an off-site material and is regulated under 40 CFR Part 279, Subpart F (Standards for Used Oil Processors and Refiners).	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The application area is located at a site where the total annual quantity of HAPs in the off-site material is less than 1 megagram per year. <i>If the response to Question VIII.O.10 is "YES," go to Section VIII.P.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
O. Subpart DD - National Emission Standards for Off-site Waste and Recovery Operations (continued)	
11. The application area receives offsite materials with average VOHAP concentration less than 500 ppmw at the point of delivery that are not combined with materials having a VOHAP concentration of 500 ppmw or greater. <i>If the response to Question VIII.O.11 is "NO," go to Question VIII.O.14.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
12. VOHAP concentration is determined by direct measurement.	<input type="checkbox"/> YES <input type="checkbox"/> NO
13. VOHAP concentration is based on knowledge of the off-site material.	<input type="checkbox"/> YES <input type="checkbox"/> NO
14. The application area includes an equipment component that is a pump, compressor, and agitator, pressure relief device, sampling connection system, open-ended valve or line, valve, connector or instrumentation system. <i>If the response to Question VIII.O.14 is "NO," go to Question VIII.O.17.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
15. An equipment component in the application area contains or contacts off-site material with a HAP concentration greater than or equal to 10% by weight.	<input type="checkbox"/> YES <input type="checkbox"/> NO
16. An equipment component in the application area is intended to operate 300 hours or more during a 12-month period.	<input type="checkbox"/> YES <input type="checkbox"/> NO
17. The application area includes containers that manage non-exempt off-site material.	<input type="checkbox"/> YES <input type="checkbox"/> NO
18. The application area includes individual drain systems that manage non-exempt off-site materials.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
P. Subpart GG - National Emission Standards for Aerospace Manufacturing and Rework Facilities	
1. The application area includes facilities that manufacture or rework commercial, civil, or military aerospace vehicles or components. <i>If the response to Question VIII.P.1 is "NO" or "N/A," go to Section VIII.Q.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area includes one or more of the affected sources specified in 40 CFR § 63.741(c)(1) - (7).	<input type="checkbox"/> YES <input type="checkbox"/> NO
Q. Subpart HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities.	
1. The application area contains facilities that process, upgrade or store hydrocarbon liquids that are located at oil and natural gas production facilities prior to the point of custody transfer.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area contains facilities that process, upgrade or store natural gas prior to the point at which natural gas enters the natural gas transmission and storage source category or is delivered to a final end user. <i>For SOP applications, if the responses to Questions VIII.Q.1 and VIII.Q.2 are both "NO," go to Section VIII.R.</i> <i>For GOP applications, if the responses to Questions VIII.Q.1 and VIII.Q.2 are both "NO," go to Section VIII.Z.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area contains only facilities that exclusively process, store or transfer black oil as defined in § 63.761. <i>For SOP applications, if the response to Question VIII.Q.3 is "YES," go to Section VIII.R.</i> <i>For GOP applications, if the response to Question VIII.Q.3 is "YES," go to Section VIII.Z.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area is located at a site that is a major source of HAP. <i>If the response to Question VIII.Q.4 is "NO," go to Question VIII.Q.6.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
Q. Subpart - HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities (continued)	
5.	<p>The application area contains only a facility, prior to the point of custody transfer, with facility-wide actual annual average natural gas throughput less than 18.4 thousand standard cubic meters (649,789.9 ft³) per day and a facility-wide actual annual average hydrocarbon liquid throughput less than 39,700 liters (10,487.6 gallons) per day.</p> <p><i>For SOP applications, if the response to Question VIII.Q.5 is "YES," go to Section VIII.R.</i></p> <p><i>For GOP applications, if the response to Question VIII.Q.5 is "YES," go to Section VIII.Z.</i></p> <p><i>For all applications, if the response to Question VIII.Q.5 is "NO," go to Question VIII.Q.9.</i></p>
6.	<p>The application area includes a triethylene glycol (TEG) dehydration unit.</p> <p><i>For SOP applications, if the answer to Question VIII.Q.6 is "NO," go to Section VIII.R. For GOP applications, if the response to Question VIII.Q.6 is "NO," go to Section VIII.Z.</i></p>
7.	<p>The application area is located at a site that is within the boundaries of UA plus offset or a UC, as defined in 40 CFR § 63.761.</p>
8.	<p>The site has actual emissions of 5 tons per year or more of a single HAP, or 12.5 tons per year or more of a combination of HAP.</p>
9.	<p>Emissions for major source determination are being estimated based on the maximum natural gas or hydrocarbon liquid throughput as calculated in § 63.760(a)(1)(i)-(iii).</p>

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(ccc) Form OP-REQ1: Page 55	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
R. Subpart II - National Emission Standards for Shipbuilding and Ship Repair (Surface Coating)	
1. The application area includes shipbuilding or ship repair operations. <i>If the response to Question VIII.R.1 is "NO," go to Section VIII.S.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. Shipbuilding or ship repair operations located in the application area are subject to 40 CFR Part 63, Subpart II.	<input type="checkbox"/> YES <input type="checkbox"/> NO
S. Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations	
1. The application area includes wood furniture manufacturing operations and/or wood furniture component manufacturing operations. <i>If the response to Question VIII.S.1 is "NO" or "N/A," go to Section VIII.T.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area meets the definition of an "incidental wood manufacturer" as defined in 40 CFR § 63.801.	<input type="checkbox"/> YES <input type="checkbox"/> NO
T. Subpart KK - National Emission Standards for the Printing and Publishing Industry	
1. The application area includes publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
U. Subpart PP - National Emission Standards for Containers	
1. The application area includes containers for which another 40 CFR Part 60, 61, or 63 subpart references the use of 40 CFR Part 63, Subpart PP for the control of air emissions. <i>If the response to Question VIII.U.1 is "NO," go to Section VIII.V.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes containers using Container Level 1 controls.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes containers using Container Level 2 controls.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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(ddd) Form OP-REQ1: Page 56	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
U. Subpart PP - National Emission Standards for Containers (continued)	
4. The application area includes containers using Container Level 3 controls.	<input type="checkbox"/> YES <input type="checkbox"/> NO
V. Subpart RR - National Emission Standards for Individual Drain Systems	
1. The application area includes individual drain systems for which another 40 CFR Part 60, 61, or 63 subpart references the use of 40 CFR Part 63, Subpart RR for the control of air emissions.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards	
1. The application area includes an acetal resins production process unit; an acrylic and modacrylic fiber production process unit complying with 40 CFR § 63.1103(b)(3)(i); or an existing polycarbonate production process.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes process wastewater streams generated from an acetal resins production process unit; an acrylic and modacrylic fiber production process unit complying with 40 CFR § 63.1103(b)(3)(i); or an existing polycarbonate production process. <i>If the responses to Questions VIII.W.1 and VIII.W.2 are both "NO," go to Question VIII.W.20.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 under the requirements of 40 CFR § 63.132(c).	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes process wastewater streams that are determined to be Group 2 under the requirements of 40 CFR § 63.132(c).	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. All Group 1 wastewater streams at the site are determined to have a total source mass flow rate of less than 1 MG/yr.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.W.6 is "NO," go to Question VIII.W.8.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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(eee) Form OP-REQ1: Page 57	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)	
7. The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.W.8 and W.9 are both "NO," go to Question VIII.W.11.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	<input type="checkbox"/> YES <input type="checkbox"/> NO
11. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	<input type="checkbox"/> YES <input type="checkbox"/> NO
12. The application area includes individual drain systems that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. <i>If the response to Question VIII.W.12 is "NO," go to Question VIII.W.15.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
13. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of covers and, if vented, closed vent systems and control devices.	<input type="checkbox"/> YES <input type="checkbox"/> NO
14. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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(fff) Form OP-REQ1: Page 58	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)	
15. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of an acetal resins production process unit; an acrylic and modacrylic fiber production process unit complying with 40 CFR § 63.1103(b)(3)(i); or an existing polycarbonate production process unit. <i>If the response to Question VIII.W.15 is "NO," go to Question VIII.W.20.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
16. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that meet the criteria listed in 40 CFR § 63.1106(c)(1) - (3). <i>If the response to Question VIII.W.16 is "NO," go to Question VIII.W.20.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
17. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds meeting the definition of organic HAP in Table 9 to 40 CFR Part 60, Subpart G, at any flow rate.	<input type="checkbox"/> YES <input type="checkbox"/> NO
18. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds meeting the definition of organic HAP in Table 9 to 40 CFR Part 60, Subpart G, at an annual average flow rate greater than or equal to 10 liters per minute.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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(ggg) Form OP-REQ1: Page 59	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)	
19. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of an acrylic resins or acrylic and modacrylic fiber production process unit that is part of a new affected source or is a new affected source and the equipment conveys water with a total annual average concentration greater than or equal to 10 ppmw of compounds meeting the definition of organic HAP in Table 9 to 40 CFR Part 60, Subpart G, at an average annual flow rate greater than or equal to 0.02 liter per minute.	<input type="checkbox"/> YES <input type="checkbox"/> NO
20. The application area includes an ethylene production process unit.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
21. The application area includes waste streams generated from an ethylene production process unit. <i>If the responses to Questions VIII.W.20 and VIII.W.21 are both "NO" or "N/A," go to Question VIII.W.54.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
22. The waste stream(s) contains at least one of the chemicals listed in 40 CFR § 63.1103(e), Table 7(g)(1). <i>If the response to Question VIII.W.22 is "NO," go to Question VIII.W.54.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
23. Waste stream(s) are transferred off-site for treatment. <i>If the response to Question VIII.W.23 is "NO," go to Question VIII.W.25.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
24. The application area has waste management units that treat or manage waste stream(s) prior to transfer off-site for treatment. <i>If the response to Question VIII.W.24 is "NO," go to Question VIII.W.54.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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(hhh) Form OP-REQ1: Page 60	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)	
25. The total annual benzene quantity from waste at the site is less than 10 Mg/yr as determined according to 40 CFR § 61.342(a).	<input type="checkbox"/> YES <input type="checkbox"/> NO
26. The application area contains at least one waste stream that is a continuous butadiene waste stream as defined in 40 CFR § 63.1082(b). <i>If the response to Question VIII.W.26 is "NO," go to Question VIII.W.43.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
27. The waste stream(s) contains at least 10 ppmw 1, 3-butadiene at a flow rate of 0.02 liters per minute or is designated for control. <i>If the response to Question VIII.W.27 is "NO," go to Question VIII.W.43.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
28. The control requirements of 40 CFR Part 63, Subpart G for process wastewater as specified in 40 CFR § 63.1095(a)(2) are selected for control of the waste stream(s). <i>If the response to Question VIII.W.28 is "NO," go to Question VIII.W.33.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
29. The application area includes containers that receive, manage, or treat a continuous butadiene waste stream.	<input type="checkbox"/> YES <input type="checkbox"/> NO
30. The application area includes individual drain systems that receive, manage, or treat a continuous butadiene waste stream. <i>If the response to Question VIII.W.30 is "NO," go to Question VIII.W.43.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
31. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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(iii) Form OP-REQ1: Page 61	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)	
32. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs. <i>If the response to Question VIII.W.32 is required, go to Question VIII.W.43.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
33. The application area has containers, as defined in 40 CFR § 61.341, that receive a continuous butadiene waste stream. <i>If the response to Question VIII.W.33 is "NO," go to Question VIII.W.36.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
34. The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers. <i>If the response to Question VIII.W.34 is "YES," go to Question VIII.W.36.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
35. Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	<input type="checkbox"/> YES <input type="checkbox"/> NO
36. The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage a continuous butadiene waste stream. <i>If the response to Question VIII.W.36 is "NO," go to Question VIII.W.43.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
37. The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. <i>If the response to Question VIII.W.37 is "YES," go to Question VIII.W.43.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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(iii) Form OP-REQ1: Page 62	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)	
38. The application area has individual drain systems complying with 40 CFR § 61.346(a). <i>If the response to Question VIII.W.38 is "NO," go to Question VIII.W.40.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
39. Covers and closed-vent systems used for individual drain systems operate such that the individual drain system is maintained at a pressure less than atmospheric pressure.	<input type="checkbox"/> YES <input type="checkbox"/> NO
40. The application area has individual drain systems complying with 40 CFR § 61.346(b). <i>If the response to Question VIII.W.40 is "NO," go to Question VIII.W.43.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
41. Junction boxes in the individual drain systems are equipped with a system to prevent the flow of organic vapors from the junction box vent pipe to the atmosphere during normal operation.	<input type="checkbox"/> YES <input type="checkbox"/> NO
42. Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device.	<input type="checkbox"/> YES <input type="checkbox"/> NO
43. The application area has at least one waste stream that contains benzene. <i>If the response to Question VIII.W.43 is "NO," go to Question VIII.W.54.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
44. The application area has containers, as defined in 40 CFR § 61.341, that receive a waste stream containing benzene. <i>If the response to Question VIII.W.44 is "NO," go to Question VIII.W.47.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
45. The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers. <i>If the response to Question VIII.W.45 is "YES," go to Question VIII.W.47.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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(kkk) Form OP-REQ1: Page 63	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)	
46. Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	<input type="checkbox"/> YES <input type="checkbox"/> NO
47. The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage a waste stream containing benzene. <i>If the response to Question VIII.W.47 is "NO," go to Question VIII.W.54.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
48. The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. <i>If the response to Question VIII.W.48 is "YES," go to Question VIII.W.54.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
49. The application area has individual drain systems complying with 40 CFR § 61.346(a). <i>If the response to Question VIII.W.49 is "NO," go to Question VIII.W.51.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
50. Covers and closed-vent systems used for individual drain systems operate such that the individual drain system is maintained at a pressure less than atmospheric pressure.	<input type="checkbox"/> YES <input type="checkbox"/> NO
51. The application area has individual drain systems complying with 40 CFR § 61.346(b). <i>If the response to Question VIII.W.51 is "NO," go to Question VIII.W.54.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
52. Junction boxes in the individual drain systems are equipped with a system to prevent the flow of organic vapors from the junction box vent pipe to the atmosphere during normal operation.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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(III) Form OP-REQ1: Page 64	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)	
53. Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device.	<input type="checkbox"/> YES <input type="checkbox"/> NO
54. The application area contains a cyanide chemicals manufacturing process. <i>If the response to Question VIII.W.54 is "NO," go to Section VIII.X.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
55. The cyanide chemicals manufacturing process generates maintenance wastewater containing hydrogen cyanide or acetonitrile.	<input type="checkbox"/> YES <input type="checkbox"/> NO
X. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins	
1. The application area includes thermoplastic product process units, and/or their associated affected sources specified in 40 CFR § 63.1310(a)(1) - (5), that are subject to 40 CFR Part 63, Subpart JJJ. <i>If the response to Question VIII.X.1 is "NO," go to Section VIII.Y.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes thermoplastic product process units and/or wastewater streams and wastewater operations that are associated with thermoplastic product process units. <i>If the response to Question VIII.X.2 is "NO," go to Section VIII.Y.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. All process wastewater streams generated or managed in the application area are from sources producing polystyrene. <i>If the response to Question VIII.X.3 is "YES," go to Section VIII.Y.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. All process wastewater streams generated or managed in the application area are from sources producing ASA/AMSAN. <i>If the response to Question VIII.X.4 is "YES," go to Section VIII.Y.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
X. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins (continued)	
5. The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 for organic HAPs as defined in 40 CFR § 63.1312.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes process wastewater streams, located at existing sources, that are Group 2 for organic HAPs as defined in 40 CFR § 63.1312.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes process wastewater streams, located at new sources, that are Group 2 for organic HAPs as defined in 40 CFR § 63.1312.	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.X.8 is "YES," go to Question VIII.X.18.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.X.9 is "NO," go to Question VIII.X.11.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	<input type="checkbox"/> YES <input type="checkbox"/> NO
11. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	<input type="checkbox"/> YES <input type="checkbox"/> NO
12. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.X.11 - VIII.X.12 are both "NO," go to Question VIII.X.14.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
X. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins (continued)	
13. The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Containers	
14. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Drains	
15. The application area includes individual drain systems that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. <i>If the response to Question VIII.X.15 is "NO," go to Question VIII.X.18.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
16. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	<input type="checkbox"/> YES <input type="checkbox"/> NO
17. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	<input type="checkbox"/> YES <input type="checkbox"/> NO
18. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of an thermoplastic product process unit. <i>If the response to Question VIII.X.18 is "NO," go to Section VIII.Y.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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(ooo) Form OP-REQ1: Page 67	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
X. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins (continued)	
<i>Drains (continued)</i>	
19. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that meet the criteria listed in 40 CFR § 63.149(d) and § 63.1330(b)(12). <i>If the response to Question VIII.X.19 is "NO," go to Section VIII.Y.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
20. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.1312, at any flow rate.	<input type="checkbox"/> YES <input type="checkbox"/> NO
21. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.1312, at an annual average flow rate greater than or equal to 10 liters per minute.	<input type="checkbox"/> YES <input type="checkbox"/> NO
22. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of an thermoplastic product process unit that is a new affected source or part of a new affected source and the equipment conveys water with a total annual average concentration greater than or equal to 10 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.1312, at an average annual flow rate greater than or equal to 0.02 liter per minute	<input type="checkbox"/> YES <input type="checkbox"/> NO

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(ppp) Form OP-REQ1: Page 68	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
Y. Subpart UUU - National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic reforming Units, and Sulfur Recovery Units.	
1. The application area is subject to 40 CFR Part 63, Subpart UUU - National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic reforming Units, and Sulfur Recovery Units.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Z. Subpart AAAA - National Emission Standards for Hazardous Air Pollutants for Municipal Solid Waste (MSW) Landfills.	
1. The application area is subject to 40 CFR Part 63, Subpart AAAA - National Emission Standards for Hazardous Air Pollutants for Municipal Solid Waste Landfills.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON)	
1. The application area is located at a site that includes process units that manufacture as a primary product one or more of the chemicals listed in 40 CFR § 63.2435(b)(1).	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area is located at a plant site that is a major source as defined in FCAA § 112(a).	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area is located at a site that includes miscellaneous chemical manufacturing process units (MCPU) that process, use or generate one or more of the organic hazardous air pollutants listed in § 112(b) of the Clean Air Act or hydrogen halide and halogen HAP. <i>If the response to Question VIII.AA.1, AA.2 or AA.3 is "NO," go to Section VIII.BB.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes process vents, storage vessels, transfer racks, or waste streams associated with a miscellaneous chemical manufacturing process subject to 40 CFR 63, Subpart FFFF. <i>If the response to Question VIII.AA.4 is "NO," go to Section VIII.BB.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)	
5. The application area includes process wastewater streams. <i>If the response to Question VIII.AA.5 is "NO," go to Question VIII.AA.18.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 for compounds listed in Table 8 of 40 CFR Part 63, Subpart G or Table 8 and Table 9, as appropriate, of 40 CFR Part 63, Subpart FFFF.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
7. The application area includes process wastewater streams that are Group 2 for compounds listed in Table 8 or Table 8 and Table 9, as appropriate, of 40 CFR Part 63, Subpart FFFF.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
8. All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.AA.8 is "YES," go to Section VIII.AA.22.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
9. The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.AA.9 is "NO," go to Question VIII.AA.11.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
10. The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	<input type="checkbox"/> YES <input type="checkbox"/> NO
11. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
12. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.AA.11 and VIII.AA.12 are both "NO," go to Question VIII.AA.18.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)	
13. Group 1 wastewater streams are transferred to an offsite treatment facility meeting the requirements of 40 CFR § 63.138(h). <i>If the response to Question VIII.AA.13 is "NO," go to Question VIII.AA.15.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
14. The option to document in the notification of compliance status report that the wastewater will be treated in a facility meeting the requirements of 40 CFR § 63.138(h) is elected.	<input type="checkbox"/> YES <input type="checkbox"/> NO
15. Group 1 wastewater streams or residuals with a total annual average concentration of compounds in Table 8 of 40 CFR Part 63, Subpart FFFF less than 50 ppmw are transferred offsite. <i>If the response to Question VIII.AA.15 is "NO," go to Question VIII.AA.17.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
16. The transferor is demonstrating that less than 5 percent of the HAP in Table 9 of 40 CFR Part 63, Subpart FFFF is emitted from waste management units up to the activated sludge unit.	<input type="checkbox"/> YES <input type="checkbox"/> NO
17. The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	<input type="checkbox"/> YES <input type="checkbox"/> NO
18. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
19. The application area includes individual drain systems that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream. <i>If the response to Question VIII.AA.19 is "NO," go to Question VIII.AA.22.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
20. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)	
21. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	<input type="checkbox"/> YES <input type="checkbox"/> NO
22. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of a chemical manufacturing process unit that meets the criteria of 40 CFR § 63.100(b). <i>If the response to Question VIII.AA.22 is "NO," go to Section VIII.BB.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
23. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes (that are part of a miscellaneous chemical manufacturing process unit) that meet the criteria listed in 40 CFR § 63.149(d). <i>If the response to Question VIII.AA.23 is "NO," go to Section VIII.BB.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
24. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration of compounds in table 8 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 10,000 ppmw at any flow rate, and the total annual load of compounds in table 8 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 200 lb/yr.	<input type="checkbox"/> YES <input type="checkbox"/> NO
25. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration of compounds in table 8 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 1,000 ppmw, and the annual average flow rate is greater than or equal to 1 liter per minute.	<input type="checkbox"/> YES <input type="checkbox"/> NO
26. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of a chemical manufacturing process unit that is subject to the new source requirements of 40 CFR § 63.2445(a); and the equipment conveys water with a combined total annual average concentration of compounds in tables 8 and 9 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 30,000 ppmw, and the combined total annual load of compounds in tables 8 and 9 to this subpart is greater than or equal to 1 tpy.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)	
BB. Subpart GGGG - National Emission Standards for Hazardous Air Pollutants for: Solvent Extractions for Vegetable Oil Production.	
1. The application area includes a vegetable oil production process that: is by itself a major source of HAP emissions or, is collocated within a plant site with other sources that are individually or collectively a major source of HAP emissions.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
CC. Subpart GGGGG - National Emission Standards for Hazardous Air Pollutants: Site Remediation	
1. The application area includes a facility at which a site remediation is conducted. <i>If the answer to Question VIII.CC.1 is "NO," go to Section VIII.DD.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area is located at a site that is a major source of HAP. <i>If the answer to Question VIII.CC.2 is "NO," go to Section VIII.DD.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. All site remediation's qualify for one of the exemptions contained in 40 CFR § 63.7881(b)(1) through (6). <i>If the answer to Question VIII.CC.3 is "YES," go to Section VIII.DD.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. Prior to beginning site remediation activities it was determined that the total quantity of HAP listed in Table 1 of Subpart GGGGG that will be removed during all site remediations will be less than 1 Mg/yr. <i>If the answer to Question VIII.CC.4 is "YES," go to Section VIII.DD.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The site remediation will be completed within 30 consecutive calendar days.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. No site remediation will exceed 30 consecutive calendar days. <i>If the answer to Question VIII.CC.6 is "YES," go to Section VIII.DD.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. Site remediation materials subject to 40 CFR Part 63, Subpart GGGGG are transferred from the application area to an off-site facility.	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. All site remediation materials subject to 40 CFR Part 63, Subpart GGGGG are transferred from the application area to an off-site facility. <i>If the answer to Question VIII.CC.8 is "YES," go to Section VIII.DD.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
CC. Subpart GGGGG - National Emission Standards for Hazardous Air Pollutants: Site Remediation (continued)	
9. The application area includes containers that manage site remediation materials subject to 40 CFR Part 63, Subpart GGGGG. <i>If the response to Question VIII.CC.9 is "NO," go to Question VIII.CC.14.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The application area includes containers using Container Level 1 controls as specified in 40 CFR § 63.922(b).	<input type="checkbox"/> YES <input type="checkbox"/> NO
11. The application area includes containers with a capacity greater than 0.46 m ³ that meet the requirements of 40 CFR § 63.7900(b)(3)(i) and (ii).	<input type="checkbox"/> YES <input type="checkbox"/> NO
12. The application area includes containers using Container Level 2 controls as specified in 40 CFR § 63.923(b).	<input type="checkbox"/> YES <input type="checkbox"/> NO
13. The application area includes containers using Container Level 3 controls as specified in 40 CFR § 63.924(b).	<input type="checkbox"/> YES <input type="checkbox"/> NO
14. The application area includes individual drain systems complying with the requirements of 40 CFR § 63.962.	<input type="checkbox"/> YES <input type="checkbox"/> NO
DD. Subpart YYYYY - National Emission Standards for Hazardous Air Pollutants for Area/Sources: Electric Arc Furnace Steelmaking Facilities	
1. The application area includes an electric arc furnace (EAF) steelmaking facility, and the site is an area source of hazardous air pollutant (HAP) emissions. <i>If the response to Question VIII.DD.1 is "NO," go to Section VIII.EE.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The EAF steelmaking facility is a research and development facility. <i>If the response to Question VIII.DD.2 is "YES," go to Section VIII.EE.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. Metallic scrap is utilized in the EAF.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. Scrap containing motor vehicle scrap is utilized in the EAF.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. Scrap not containing motor vehicle scrap is utilized in the EAF.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
EE. Subpart BBBBBB - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities	
1. The application area is located at a site that is an area source of HAPs. <i>If the answer to Question EE.1 is "NO," go to Section VIII.FF.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes a pipeline breakout station, as defined in 40 CFR Part 63, Subpart BBBBBB, not subject to the control requirements of 40 CFR Part 63, Subpart R.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes a pipeline pumping station as defined in 40 CFR Part 63, Subpart BBBBBB.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes a bulk gasoline plant as defined in 40 CFR Part 63, Subpart BBBBBB. <i>If the answer to Question VIII.EE.4 is "NO," go to Question VIII.EE.6.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The bulk gasoline plant was operating, prior to January 10, 2010, in compliance with an enforceable State, local or tribal rule or permit that requires submerged fill as specified in 40 CFR § 63.11086(a).	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes a bulk gasoline terminal, as defined in 40 CFR Part 63, Subpart BBBBBB, not subject to the control requirements of 40 CFR Part 63, Subpart R or Subpart CC. <i>If the answer to Question VIII.EE.6 is "NO," go to Section VIII.FF.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The bulk gasoline terminal has throughput of less than 250,000 gallons per day. <i>If the answer to Question VIII.EE.7 is "YES," go to Section VIII.FF.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. The bulk gasoline terminal loads gasoline into gasoline cargo tanks other than railcar cargo tanks.	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. The bulk gasoline terminal loads gasoline into railcar cargo tanks. <i>If the answer to Question VIII.EE.9 is "NO," go to Section VIII.FF.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The bulk gasoline terminal loads gasoline into railcar cargo tanks which do not collect vapors from a vapor balance system.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
EE. Subpart BBBBBB - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities (continued)	
11. The bulk gasoline terminal loads gasoline into railcar cargo tanks which collect vapors from a vapor balance system and that system complies with a Federal, State, local, tribal rule or permit.	<input type="checkbox"/> YES <input type="checkbox"/> NO
FF. Subpart CCCCCC - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities	
1. The application area is located at a site that is an area source of hazardous air pollutants. <i>If the answer to Question VIII.FF.1 is "NO," go to Section VIII.GG.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes at least one gasoline dispensing facility as defined in 40 CFR § 63.11132. <i>If the answer to Question VIII.FF.2 is "NO," go to Section VIII.GG.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes at least one gasoline dispensing facility with a monthly throughput of less than 10,000 gallons.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes at least one gasoline dispensing facility where gasoline is dispensed from a fixed gasoline storage tank into a portable gasoline tank for the on-site delivery and subsequent dispensing into other gasoline-fueled equipment.	<input type="checkbox"/> YES <input type="checkbox"/> NO
GG. Recently Promulgated 40 CFR Part 63 Subparts	
1. The application area is subject to one or more promulgated 40 CFR Part 63 subparts not addressed on this form. <i>If the response to Question VIII.GG.1 is "NO," go to Section IX. A list of promulgated 40 CFR Part 63 subparts not otherwise addressed on OP-REQ1 is included in the instructions.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. Provide the Subpart designation (i.e. Subpart EEE) in the space provided below. FFFF, ZZZZ	

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IX. Title 40 Code of Federal Regulations Part 68 (40 CFR Part 68) - Chemical Accident Prevention Provisions	
A. Applicability	
1. The application area contains processes subject to 40 CFR Part 68, Chemical Accident Prevention Provisions, and specified in 40 CFR § 68.10.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
X. Title 40 Code of Federal Regulations Part 82 (40 CFR Part 82) - Protection of Stratospheric Ozone	
A. Subpart A - Production and Consumption Controls	
1. The application area is located at a site that produces, transforms, destroys, imports, or exports a controlled substance or product.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
B. Subpart B - Servicing of Motor Vehicle Air Conditioners	
1. Servicing, maintenance, and/or repair of fleet vehicle air conditioning systems using ozone-depleting refrigerants is conducted in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
C. Subpart C - Ban on Nonessential Products Containing Class I Substances and Ban on Nonessential Products Containing or Manufactured with Class II Substances	
1. The application area sells or distributes one or more nonessential products (which release a Class I or Class II substance) that are subject to 40 CFR Part 82, Subpart C.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
D. Subpart D - Federal Procurement	
1. The application area is owned/operated by a department, agency, or instrumentality of the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
E. Subpart E - The Labeling of Products Using Ozone Depleting Substances	
1. The application area includes containers in which a Class I or Class II substance is stored or transported prior to the sale of the Class I or Class II substance to the ultimate consumer.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area is a manufacturer, importer, wholesaler, distributor, or retailer of products containing a Class I or Class II substance.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
3. The application area is a manufacturer, importer, wholesaler, distributor, or retailer of products manufactured with a process that uses a Class I or Class II substance.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A

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X. Title 40 Code of Federal Regulations Part 82 (40 CFR Part 82) - Protection of Stratospheric Ozone (continued)	
F. Subpart F - Recycling and Emissions Reduction	
1. Servicing, maintenance, and/or repair on refrigeration and non-motor vehicle air condition appliances using ozone-depleting refrigerants or non-exempt substitutes is conducted in the application area.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. Disposal of appliances (including motor vehicle air conditioners) or refrigerant or non-exempt substitute reclamation occurs in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
3. The application area manufactures appliances or refrigerant recycling and recovery equipment.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
G. Subpart G - Significant New Alternatives Policy Program	
1. The application area manufactures, formulates, or creates chemicals, product substitutes, or alternative manufacturing processes that are intended for use as a replacement for a Class I or Class II compound. <i>If the response to Question X.G.1 is "NO" or "N/A," go to Section X.H.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. All substitutes produced by the application area meet one or more of the exemptions in 40 CFR § 82.176(b)(1) - (7).	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
H. Subpart H -Halon Emissions Reduction	
1. Testing, servicing, maintaining, repairing, or disposing of equipment containing halons is conducted in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. Disposal of halons or manufacturing of halon blends is conducted in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
XI. Miscellaneous	
A. Requirements Reference Tables (RRT) and Flowcharts	
1. The application area contains units that are potentially subject to a regulation for which the TCEQ has not developed an RRT and flowchart.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

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XI. Miscellaneous (continued)	
B. Forms	
1. The application area contains units that are potentially subject to a regulation for which the TCEQ has not developed a unit attribute form. <i>If the response to Question XI.B.1 is "NO" or "N/A," go to Section XI.C.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
2. Provide the Part and Subpart designation for the federal rule(s) or the Chapter, Subchapter, and Division designation for the State regulation(s) in the space provided below. <p style="text-align: center;">40 CFR Part 63, Subpart FFFF & ZZZZ; 40 CFR Part 60, Subpart A, VVa, & IIII</p>	
C. Emission Limitation Certifications	
1. The application area includes units for which federally enforceable emission limitations have been established by certification.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
D. Alternative Means of Control, Alternative Emission Limitation or Standard, or Equivalent Requirements	
1. The application area is located at a site that is subject to a site-specific requirement of the state implementation plan (SIP).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes units located at the site that are subject to a site-specific requirement of the SIP.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area includes units which demonstrate compliance by using an alternative means of control, alternative emission limitation or standard or equivalent requirements approved by the EPA Administrator. <i>If the response to Question XI.D.3 is "YES," please include a copy of the approval document with the application.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
4. The application area includes units which demonstrate compliance by using an alternative means of control, alternative emission limitation or standard or equivalent requirements approved by the TCEQ Executive Director. <i>If the response to Question XI.D.4 is "YES," please include a copy of the approval document with the application.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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For SOP applications, answer ALL questions unless otherwise directed.

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(aaaa) Form OP-REQ1: Page 79	
XI. Miscellaneous (continued)	
E. Title IV - Acid Rain Program	
1. The application area includes emission units subject to the Acid Rain Program (ARP), including the Opt-In Program.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes emission units qualifying for the new unit exemption under 40 CFR § 72.7.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area includes emission units qualifying for the retired unit exemption under 40 CFR § 72.8.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
F. 40 CFR Part 97, Subpart EEEEE - Cross-State Air Pollution Rule (CSAPR) NO_x Ozone Season Group 2 Trading Program	
1. The application area includes emission units subject to the requirements of the CSAPR NO _x Ozone Season Group 2 Trading Program. <i>If the response to Question XI.F.1 is "NO," go to Question XI.F.7.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart H for NO _x and heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes gas or oil-fired units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart H for NO _x , and the monitoring requirements of 40 CFR Part 75, Appendix D for heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes gas or oil-fired peaking units that are complying with the monitoring requirements of 40 CFR Part 75, Appendix E for NO _x , and the monitoring requirements of 40 CFR Part 75, Appendix D for heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes gas or oil-fired units that are complying with the Low Mass Emissions monitoring requirements of 40 CFR § 75.19 for NO _x and heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes units that are complying with EPA-approved alternative monitoring system requirements of 40 CFR Part 75, Subpart E for NO _x and heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes emission units that qualify for the CSAPR NO _x Ozone Season Group 2 retired unit exemption.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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(bbbb) Form OP-REQ1: Page 80	
XI. Miscellaneous (continued)	
G. 40 CFR Part 97, Subpart FFFFF - Texas SO₂ Trading Program	
1. The application area includes emission units complying with the requirements of the Texas SO ₂ Trading Program. <i>If the response to Question XI.G.1 is "NO," go to Question XI.G.6.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart B for SO ₂ and 40 CFR Part 75, Subpart H for heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes gas or oil-fired units that are complying with the monitoring requirements of 40 CFR Part 75, Appendix D for SO ₂ and heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes gas or oil-fired units that are complying with the Low Mass Emissions monitoring requirements of 40 CFR § 75.19 for SO ₂ and heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes units that are complying with EPA-approved alternative monitoring system requirements of 40 CFR Part 75, Subpart E for SO ₂ and heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes emission units that qualify for the Texas SO ₂ Trading Program retired unit exemption.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
H. Permit Shield (SOP Applicants Only)	
1. A permit shield for negative applicability entries on Form OP-REQ2 (Negative Applicable Requirement Determinations) is being requested or already exists in the permit.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

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(cccc) Form OP-REQ1: Page 81	
XI. Miscellaneous (continued)	
I. GOP Type (Complete this section for GOP applications only)	
1. The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under GOP No. 511 - Oil and Gas General Operating Permit for Brazoria, Chambers, Collin, Dallas, Denton, El Paso, Ellis, Fort Bend, Galveston, Hardin, Harris, Jefferson, Johnson, Kaufman, Liberty, Montgomery, Orange, Parker, Rockwall, Tarrant, Waller, and Wise Counties.	<input type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under GOP No. 512 - Oil and Gas General Operating Permit for Gregg, Nueces, and Victoria Counties.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under GOP No. 513 - Oil and Gas General Operating Permit for Aransas, Bexar, Calhoun, Matagorda, San Patricio, and Travis Counties.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under GOP No. 514 - Oil and Gas General Operating Permit for All Texas Counties Except Aransas, Bexar, Brazoria, Calhoun, Chambers, Collin, Dallas, Denton, El Paso, Ellis, Fort Bend, Galveston, Gregg, Hardin, Harris, Jefferson, Johnson, Kaufman, Liberty, Matagorda, Montgomery, Nueces, Orange, Parker, Rockwall, San Patricio, Tarrant, Travis, Victoria, Waller, and Wise County.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area is applying for initial issuance, revision, or renewal of a solid waste landfill general operating permit under GOP No. 517 - Municipal Solid Waste Landfill general operating permit.	<input type="checkbox"/> YES <input type="checkbox"/> NO
J. Title 30 TAC Chapter 101, Subchapter H	
1. The application area is located in a nonattainment area. <i>If the response to Question XI.J.1 is "NO," go to question XI.J.3.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. The applicant has or will generate emission reductions to be credited in the TCEQ Emissions Banking and Trading Program.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
3. The applicant has or will generate discrete emission reductions to be credited in the TCEQ Emissions Banking and Trading Program.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A

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(dddd) Form OP-REQ1: Page 82	
XI. Miscellaneous (continued)	
J. Title 30 TAC Chapter 101, Subchapter H (continued)	
4.	The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area where the facilities have a collective uncontrolled design capacity to emit 10 tpy or more of NO _x . <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
5.	The application area includes an electric generating facility permitted under 30 TAC Chapter 116, Subchapter I. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
6.	The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area and the site has a potential to emit more than 10 tpy of highly-reactive volatile organic compounds (HRVOC) from facilities covered under 30 TAC Chapter 115, Subchapter H, Divisions 1 and 2. <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
7.	The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area, the site has a potential to emit 10 tpy or less of HRVOC from covered facilities and the applicant is opting to comply with the requirements of 30 TAC Chapter 101, Subchapter H, Division 6, Highly Reactive VOC Emissions Cap and Trade Program. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
K. Periodic Monitoring	
1.	The applicant or permit holder is submitting at least one periodic monitoring proposal described on Form OP-MON in this application. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2.	The permit currently contains at least one periodic monitoring requirement. <i>If the responses to Questions XI.K.1 and XI.K.2 are both "NO," go to Section XI.L.</i> <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
3.	All periodic monitoring requirements are being removed from the permit with this application. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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(eeee) Form OP-REQ1: Page 83		
XI. Miscellaneous (continued)		
L. Compliance Assurance Monitoring		
1.	The application area includes at least one unit that does not meet the CAM exemptions in 40 CFR § 64.2(b) for all applicable requirements that it is subject to, and the unit has a pre-control device potential to emit greater than or equal to the amount in tons per year required in a site classified as a major source. <i>If the response to Question XI.L.1 is "NO," go to Section XI.M.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2.	The unit or units defined by XI.L.1 are using a control device to comply with an applicable requirement. <i>If the response to Question XI.L.2 is "NO," go to Section XI.M.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
3.	The permit holder has submitted a CAM proposal on Form OP-MON in a previous application.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
4.	The owner/operator or permit holder is submitting a CAM proposal on Form OP-MON according to the deadlines for submittals in 40 CFR § 64.5 in this application. <i>If the responses to Questions XI.L.3 and XI.L.4 are both "NO," go to Section XI.M.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
5.	The owner/operator or permit holder is submitting a CAM implementation plan and schedule to be incorporated as enforceable conditions in the permit.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
6.	Provide the unit identification numbers for the units for which the applicant is submitting a CAM implementation plan and schedule in the space below.	
7.	At least one unit defined by XI.L.1 and XI.L.2 is using a CEMS, COMS or PEMS meeting the requirements of 40 CFR § 64.3(d)(2).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
8.	All units defined by XI.L.1 and XI.L.2 are using a CEMS, COMS or PEMS meeting the requirements of 40 CFR § 64.3(d)(2). <i>If the response to Question XI.L.8 is "YES," go to Section XI.M.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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(ffff) Form OP-REQ1: Page 84		
XI. Miscellaneous (continued)		
L. Compliance Assurance Monitoring (continued)		
9.	At least one of the CAM proposals as described by question XI.L.3 or XI.L.4 addresses particulate matter, and the emission unit has a capture system as defined in 40 CFR §64.1.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
10.	At least one of the CAM proposals as described by question XI.L.3 or XI.L.4 addresses VOC, and the emission unit has a capture system as defined in 40 CFR §64.1.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
11.	At least one of the CAM proposals as described by question XI.L.3 or XI.L.4 addresses a regulated pollutant other than particulate matter or VOC, and the emission unit has a capture system as defined in 40 CFR §64.1.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
12.	The control device in the CAM proposal as described by question XI.L.3 or XI.L.4 has a bypass.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
M. Title 30 TAC Chapter 113, Subchapter D, Division 5 - Emission Guidelines and Compliance Times		
1.	The application area includes at least one air curtain incinerator that commenced construction on or before December 9, 2004. <i>If the response to Question XI.M.1 is "NO," or "N/A," go to Section XII.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
2.	All air curtain incinerators constructed on or before December 9, 2004 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	<input type="checkbox"/> YES <input type="checkbox"/> NO
XII. New Source Review (NSR) Authorizations		
A. Waste Permits with Air Addendum		
1.	The application area includes a Municipal Solid Waste Permit or an Industrial Hazardous Waste with an Air Addendum. <i>If the response to XII.A.1 is "YES," include the waste permit numbers and issuance date in Section XII.J.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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(gggg) Form OP-REQ1: Page 85		
XII. New Source Review (NSR) Authorizations (continued)		
B. Air Quality Standard Permits		
1.	The application area includes at least one Air Quality Standard Permit NSR authorization. <i>If the response to XII.B.1 is "NO," go to Section XII.C. If the response to XII.B.1 is "YES," be sure to include the standard permit's registration numbers in Section XII.H and answer XII.B.2 - B.16 as appropriate.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2.	The application area includes at least one "State Pollution Control Project" Air Quality Standard Permit NSR authorization under 30 TAC § 116.617.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3.	The application area includes at least one non-rule Air Quality Standard Permit for Pollution Control Projects NSR authorization.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
4.	The application area includes at least one "Installation and/or Modification of Oil and Gas Facilities" Air Quality Standard Permit NSR authorization under 30 TAC § 116.620.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
5.	The application area includes at least one non-rule Air Quality Standard Permit for Oil and Gas Handling and Production Facilities NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
6.	The application area includes at least one "Municipal Solid Waste Landfill" Air Quality Standard Permit NSR authorization under 30 TAC § 116.621.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
7.	The application area includes at least one "Municipal Solid Waste Landfill Facilities and Transfer Stations" Standard Permit authorization under 30 TAC Chapter 330, Subchapter U.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
8.	The application area includes at least one "Concrete Batch Plant" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
9.	The application area includes at least one "Concrete Batch Plant with Enhanced Controls" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
10.	The application area includes at least one "Hot Mix Asphalt Plant" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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(hhhh) Form OP-REQ1: Page 86	
XII. New Source Review (NSR) Authorizations (continued)	
B. Air Quality Standard Permits (continued)	
11. The application area includes at least one "Rock Crusher" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
12. The application area includes at least one "Electric Generating Unit" Air Quality Standard Permit NSR authorization. <i>If the response to XII.B.12 is "NO," go to Question XII.B.15.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
13. For purposes of "Electric Generating Unit" Air Quality Standard Permit, the application area is located in the East Texas Region.	<input type="checkbox"/> YES <input type="checkbox"/> NO
14. For purposes of "Electric Generating Unit" Air Quality Standard Permit, the application area is located in the West Texas Region.	<input type="checkbox"/> YES <input type="checkbox"/> NO
15. The application area includes at least one "Boiler" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
16. The application area includes at least one "Sawmill" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
C. Flexible Permits	
1. The application area includes at least one Flexible Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
D. Multiple Plant Permits	
1. The application area includes at least one Multi-Plant Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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(iii) Form OP-REQ1: Page 87			
XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)			
E. PSD Permits and PSD Major Pollutants			
PSD Permit No.:	Issuance Date:	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
<i>If PSD Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html.</i>			
F. Nonattainment (NA) Permits and NA Major Pollutants			
NA Permit No.:	Issuance Date:	Pollutant(s):	
NA Permit No.:	Issuance Date:	Pollutant(s):	
NA Permit No.:	Issuance Date:	Pollutant(s):	
NA Permit No.:	Issuance Date:	Pollutant(s):	
<i>If NA Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html.</i>			
G. NSR Authorizations with FCAA § 112(g) Requirements			
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
H. Title 30 TAC Chapter 116 Permits, Special Permits, Standard Permits, Other Authorizations (Other Than Permits By Rule, PSD Permits, NA Permits) for the Application Area			
Authorization No.: 95610	Issuance Date: 09/17/2012	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:

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(iii) Form OP-REQ1: Page 88	
XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)	
I. Permits by Rule (30 TAC Chapter 106) for the Application Area	
<i>A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.</i>	
PBR No.: 106.261	Version No./Date: 11/1/2003
PBR No.: 106.262	Version No./Date: 11/1/2003
PBR No.: 106.263	Version No./Date: 11/1/2001
PBR No.: 106.264	Version No./Date: 9/4/2000
PBR No.: 106.373	Version No./Date: 9/4/2000
PBR No.: 106.433	Version No./Date: 9/4/2000
PBR No.: 106.452	Version No./Date: 9/4/2000
PBR No.: 106.454	Version No./Date: 11/1/2001
PBR No.: 106.472	Version No./Date: 9/4/2000
PBR No.: 106.473	Version No./Date: 9/4/2000
PBR No.: 106.476	Version No./Date: 9/4/2000
PBR No.: 106.478	Version No./Date: 9/4/2000
PBR No.: 106.511	Version No./Date: 9/4/2000
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
J. Municipal Solid Waste and Industrial Hazardous Waste Permits With an Air Addendum	
Permit No.:	Issuance Date:
Permit No.:	Issuance Date:
Permit No.:	Issuance Date:
Permit No.:	Issuance Date:

Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR

[Table 1](#)

Date	Permit No.	Regulated Entity No.
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Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description147877	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
	2	C3111HDR	OP-UA15	Scrubber C311-1 Vent Header		96510 <i>106.262/11/01/2003</i>	
	2	FUGITIVES	OP-UA12	PVOH Fugitives		96510 <i>106.262/11/01/2003</i> <i>[147877]</i> <i>106.261/11/01/2003</i> <i>106.262/11/01/2003</i> <i>[172343]</i>	
	2	EMGEN	OP-UA2	Emergency Generator		96510 <i>106.511/09/04/2000</i>	
<i>A</i>	<i>4</i>	<i>DEGREASE</i>	<i>OP-UA16</i>	<i>Degreasing Unit</i>		<i>106.454/11/01/2001</i>	

Form OP-REQ2
Negative Applicable/Superseded Requirement Determinations
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
	3	T-061	OP-UA3	40 CFR Part 63, Subpart FFFF	63.2485(c)	Wastewater stream is Group 2 under MON. Wastewater streams only contain compounds listed in Table 9 of 40CFR Part 63, Subpart FFFF. The combined total annual average concentration of compounds is less than 30,000 ppmw.
	3	T-061	OP-UA3	40 CFR Part 63, Subpart FFFF	63.2485(c)	Wastewater stream is Group 2 under MON. Wastewater streams only contain compounds listed in Table 9 of 40CFR Part 63, Subpart FFFF. The combined total annual average concentration of compounds is less than 30,000 ppmw.
	3	T-061	OP-UA3	40 CFR Part 63, Subpart FFFF	63.2485(c)	Wastewater stream is Group 2 under MON. Wastewater streams only contain compounds listed in Table 9 of 40CFR Part 63, Subpart FFFF. The combined total annual average concentration of compounds is less than 30,000 ppmw.

**Texas Commission on Environmental Quality
Miscellaneous Unit Attributes
Form OP-UA1 (Page 1)
Federal Operating Permit Program**

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Unit ID No.	SOP/GOP Index No.	Unit Type	Date Constructed/Placed in Service	Functionally Identical Replacement	Maximum Rated Capacity	Technical Information and Unit Description
FUGITIVES	63FFFF-1	EP				Fugitives components applicable to MON (40 CFR Part 63, Subpart FFFF) equipment leak provisions

Form OP-UA2 (Page 4)

Federal Operating Permit Program

Table 2a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart ZZZZ: National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
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Unit ID No.	SOP/GOP Index No.	HAP Source	Brake HP	Construction/ Reconstruction Date	Nonindustrial Emergency Engine	Service Type	Stationary RICE Type
FIREPMP	63ZZZZ-2	MAJOR	300-500	06+		EMER-A	
EMGEN	63ZZZZ-1	MAJOR	500+	06+		EMER-A	

Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 10)
Federal Operating Permit Program
Table 5a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP/GOP Index No.	Applicability Date	Exemptions	Service	Commencing	Manufacture Date
FIREPMP	60IIII-1	2005+	NONE	FIRE	CON	0706+

Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 11)
Federal Operating Permit Program
Table 5b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP/GOP Index No.	Diesel	AES No.	Displacement	Generator Set	Model Year	Install Date
FIREPMP	60IIII-1	DIESEL		10-		2016	2016+

Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 12)
Federal Operating Permit Program
Table 5c: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP/GOP Index No.	Kilowatts	Filter	AECD	Standard	Compliance Option	PM Compliance	Options
FIREPMP	60IIII-1	F130-368			NO	MANU YES		

Storage Tank/Vessel Attributes
Form OP-UA3 (Page 4)
Federal Operating Permit Program
Table 4a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter B: Storage of Volatile Organic Compounds (VOCs)
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP/GOP Index No.	Alternate Control Requirement	ACR ID No.	Product Stored	Storage Capacity	Throughput	Potential to Emit	Uncontrolled Emissions
GRPTKHON1	R5112-1	NO		VOC1	A40K+			
GRPTKHON2	R5112-1	NO		VOC1	A1K-25K			
GRPTKHOAC	R5112-1	NO		VOC1	A40K+			
V-720	R5112-1	NO		VOC1	A40K+			
T-912	R5112-1	NO		VOC1	A40K+			

Storage Tank/Vessel Attributes
Form OP-UA3 (Page 5)
Federal Operating Permit Program
Table 4b: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter B: Storage of Volatile Organic Compounds (VOCs)
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP/GOP Index No.	Construction Date	Tank Description	True Vapor Pressure	Primary Seal	Secondary Seal	Control Device Type	Control Device ID No.
GRPTKHON1	R5112-1		VRS1	1.5+A			FLARE	FL-051
GRPTKHON2	R5112-1		VRS1	1.5+A			FLARE	FL-051
GRPTKHOAC	R5112-1		VRS1	1.5+A			OTHER	C901SCRUB, C706SCRUB
V-720	R5112-1		VRS1	1.5+A			OTHER	C901SCRUB, C706SCRUB
T-912	R5112-1		VRS1	1.5+A			OTHER	C061SCRUB, C901SCRUB, C706SCRUB

Storage Tank/Vessel Attributes

Form OP-UA3 (Page 51)

Federal Operating Permit Program

Table 21a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

**Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing, Storage Vessels
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Emission Standard	Comb Device	95% Scrubber	PERF Test	Negative Pressure	Bypass Line
GRPTKHON1	63FFFF-1	76+FLR					
GRPTKHON1	63FFFF-2	76+FLR					
GRPTKHON1	63FFFF-3	76+FLR					
GRPTKHON2	63FFFF-1	76+FLR					
GRPTKHON2	63FFFF-2	76+FLR					
GRPTKHON2	63FFFF-3	76+FLR					
GRPTKHOAC	63FFFF-1	76+FLR					
GRPTKHOAC	63FFFF-2	76+FLR					
GRPTKHOAC	63FFFF-3	76+FLR					
V-720	63FFFF-1	76+FLR					
V-720	63FFFF-2	76+FLR					
V-720	63FFFF-3	76+FLR					
T-912	63FFFF-1	76+CDPMV					

Storage Tank/Vessel Attributes

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Federal Operating Permit Program

Table 21c: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

**Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing, Storage Vessels
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Designated HAL	Determined HAL	Prior Eval	Assessment Waiver	Negative Pressure	Bypass Line
GRPTKHON1	63FFFF-1	NO	NO	NO	NO	NO	NONE
GRPTKHON1	63FFFF-2	NO	NO	NO	NO	NO	FLOWIND
GRPTKHON1	63FFFF-3	NO	NO	NO	NO	NO	CARSEAL
GRPTKHON2	63FFFF-1	NO	NO	NO	NO	NO	NONE
GRPTKHON2	63FFFF-2	NO	NO	NO	NO	NO	FLOWIND
GRPTKHON2	63FFFF-3	NO	NO	NO	NO	NO	CARSEAL
GRPTKHOAC	63FFFF-1	NO	NO	NO	NO	NO	NONE
GRPTKHOAC	63FFFF-2	NO	NO	NO	NO	NO	FLOWIND
GRPTKHOAC	63FFFF-3	NO	NO	NO	NO	NO	CARSEAL
V-720	63FFFF-1	NO	NO	NO	NO	NO	NONE
V-720	63FFFF-2	NO	NO	NO	NO	NO	FLOWIND
V-720	63FFFF-3	NO	NO	NO	NO	NO	CARSEAL

**Storage Tank/Vessel Attributes
Form OP-UA3 (Page 55)**

Federal Operating Permit Program

Table 21e: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

**Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing, Storage Vessels
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Alt 63SS Mon Parameters	CEMS	SS Device Type	Meets 63.988(b)(2)	Water	Designated HAL
T-912	63FFFF-1	NO	NO	ABS		YES	NO

Storage Tank/Vessel Attributes

Form OP-UA3 (Page 56)

Federal Operating Permit Program

Table 21f: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

**Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing, Storage Vessels
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Determined HAL	HAL Device Type	Prior Test	Test Waiver	Formaldehyde	Negative Pressure	Bypass Line
GRPTKHON1	63FFFF-1	NO	NONE	NO	NO	NO	NO	NONE
GRPTKHON1	63FFFF-2	NO	NONE	NO	NO	NO	NO	FLOWIND
GRPTKHON1	63FFFF-3	NO	NONE	NO	NO	NO	NO	CARSEAL
GRPTKHON2	63FFFF-1	NO	NONE	NO	NO	NO	NO	NONE
GRPTKHON2	63FFFF-2	NO	NONE	NO	NO	NO	NO	FLOWIND
GRPTKHON2	63FFFF-3	NO	NONE	NO	NO	NO	NO	CARSEAL
GRPTKHOAC	63FFFF-1	NO	NONE	NO	NO	NO	NO	NONE
GRPTKHOAC	63FFFF-2	NO	NONE	NO	NO	NO	NO	FLOWIND
GRPTKHOAC	63FFFF-3	NO	NONE	NO	NO	NO	NO	CARSEAL
T-912	63FFFF-1	NO	NONE	NO	NO	NO	NO	NONE

Storage Tank/Vessel Attributes

Form OP-UA3 (Page 57)

Federal Operating Permit Program

Table 22a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing, Wastewater
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Process Wastewater	Meets 40 CFR § 63.149(d)	Sparged	Emission Routing	Installed Before 12/31/92
T-061	63FFFF-1	YES				
V-606	63FFFF-1	YES				
T-920	63FFFF-1	YES				

Storage Tank/Vessel Attributes

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Federal Operating Permit Program

Table 22c: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

**Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing, Wastewater
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Wastewater Tank Usage	Wastewater Tank Properties	Emission Control Type	EEL ID No.	Closed Vent System	Bypass Lines
T-061	63FFFF-1	NO	OTHER	CVS/CD		SUBPTH	NONE
V-606	63FFFF-1	NO	75-				
T-920	63FFFF-1	NO	75-				

Storage Tank/Vessel Attributes

Form OP-UA3 (Page 60)

Federal Operating Permit Program

Table 22d: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

**Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing, Wastewater
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Combination of Control Devices	Control Devices	Control Device ID No.	Compliance With 40 CFR §63.139(c)(1)	Halogenated	Halogen Reduction	Alt 63G Mon Parameters	AMP ID No.
T-061	63FFFF-1	NO	SCRUB	C061SCRUB		NON		NO	

Storage Tank/Vessel Attributes

Form OP-UA3 (Page 61)

Federal Operating Permit Program

Table 22e: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

**Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing, Wastewater
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Regeneration	Performance Tests	2485(h)(3)	95% Performance Tests	Monitoring Options
T-061	63FFFF-1		NO			

**Texas Commission on Environmental Quality
Loading/Unloading Operations Attributes
Form OP-UA04 (Page 1)**

Federal Operating Permit Program

**Table 1a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter C: Loading and Unloading of Volatile Organic Compounds**

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP/GOP Index No.	Chapter 115 Facility Type	Alternate Control Requirement (ACR)	ACR ID No.	Product Transferred	Transfer Type	True Vapor Pressure	Daily Through-put	Control Options
LOADING	R5212-1	OTHER	NONE		VOC1	LOAD	0.5-		
LOADING	R5212-2	OTHER	NONE		VOC1	LOAD	0.5+	NCE2	BAL
UNLOADING	R5212-1	OTHER	NONE		VOC1	UNLOAD	0.5-		
UNLOADING	R5212-2	OTHER	NONE		VOC1	UNLOAD	0.5+	NCE2	BAL

**Texas Commission on Environmental Quality
Loading/Unloading Operations Attributes
Form OP-UA04 (Page 2)**

Federal Operating Permit Program

**Table 1b: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter C: Loading and Unloading of Volatile Organic Compounds**

Date	Permit No.:	Regulated Entity No.
08/04/2023	03759	RN106155849

Unit ID No.	SOP Index No.	Chapter 115 Control Device Type	Chapter 115 Control Device ID No.	Vapor-Tight	Vapor Space Holding Tank	Marine Terminal Exemptions	VOC Flash Point	Uncontrolled VOC Emissions
LOADING	R5212-1			NO				
LOADING	R5212-2	NONE		NO				
UNLOADING	R5212-2	NONE		NO				

**Texas Commission on Environmental Quality
Loading/Unloading Operations Attributes
Form OP-UA04 (Page 16)**

Federal Operating Permit Program

Table 9a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Emission Standard	Designated HAL	Determined HAL	Prior Eval	Assessment Waiver	Negative Pressure	Bypass Line
LOADING	63FFFF-1	NONE						
LOADING	63FFFF-2	VBAL						
UNLOADING	63FFFF-1	NONE						
UNLOADING	63FFFF-2	VBAL						

Texas Commission on Environmental Quality
Flare Attributes
Form OP-UA7 (Page 1)
Federal Operating Permit Program
Table 1: Title 30 Texas Administrative Code Chapter 111 (30 TAC Chapter 111)
Control of Air Pollution from Visible Emissions and Particulate Matter

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP/GOP Index No	Acid Gases Only	Emergency/Upset Conditions Only	Alternate Opacity Limitation (AOL)	AOL ID No.	Construction Date
FL-051	R1111-1	NO	NO			

Texas Commission on Environmental Quality

Flare Attributes

Form OP-UA7 (Page 3)

Federal Operating Permit Program

Table 3: Title 40 Code of Federal Regulations Part 60 and 61 (40 CFR Part 60 and 40 CFR Part 61)

Subpart A: General Provisions of Standards of Performance for New Stationary Sources and National Emission Standards for Hazardous Air Pollutants

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP/GOP Index No.	Subject to 40 CFR §60.18	Adhering to Heat Content Specifications	Flare Assist Type	Flare Exit Velocity	Heating Value of Gas
FL-051	60A-1	YES	YES	STEAM	60-	
FL-051	60A-2	YES	YES	STEAM	60-400	1000-
FL-051	60A-3	YES	YES	STEAM	60-400	1000+

Texas Commission on Environmental Quality

Flare Attributes

Form OP-UA7 (Page 4)

Federal Operating Permit Program

Table 4: Title 40 Code of Federal Regulations Part 63

Subpart A: General Provisions of National Emission Standards for Hazardous Air Pollutants for Source Categories

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP/GOP Index No.	Required Under 40 CFR Part 63	Heat Content Specification	Flare Assist Type	Flare Exit Velocity	Heating Value of Gas
FL-051	60A-1 63A-1	YES	YES	STEAM	60-	
FL-051	60A-2 63A-2	YES	YES	STEAM	60-400	1000-
FL-051	60A-3 63A-3	YES	YES	STEAM	60-400	1000+

Texas Commission on Environmental Quality
Flare Attributes
Form OP-UA7 (Page 5)
Federal Operating Permit Program
Table 5a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter H, Division 1: Highly-Reactive Volatile Organic Compounds-Vent Gas Control

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Out of Service	Total Gas Stream	Gas Stream Concentration	Exempt Date	Alternative Monitoring Approach	Modifications to Testing/Monitoring	Modifications to Testing/Monitoring ID No.	Flare Type
FL-051	R5722-1	NO	YES	YES		NO	NO		MULTI

Texas Commission on Environmental Quality
Flare Attributes
Form OP-UA7 (Page 6)
Federal Operating Permit Program
Table 5b: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter H, Division 1: Highly-Reactive Volatile Organic Compounds-Vent Gas Control

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Monitoring Requirements	§115.725(e) Requirements	Multi-Purpose Usage	Flow Rate	Physical Seal	Monitoring Option	§115.725(h)(4) Alternative	Tank Service
FL-051	R5722-1	YES							NO

Fugitive Emission Unit Attributes
Form OP-UA12 (Page 11)

Federal Operating Permit Program

Table 2a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)

Subchapter D: Fugitive Emission Control in Petroleum Refining, Natural Gas/Gasoline Processing, and Petrochemical Processes in Ozone
Nonattainment Areas
Texas Commission on Environmental Quality

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP/GOP Index No.	Title 30 TAC § 115.352 Applicable	• < 250 Components at Site	Weight Percent VOC	Reciprocating Compressors or Positive Displacement Pumps
FUGITIVES	R5352-ALL	PETCHEM	NO	10B	NO

Fugitive Emission Unit Attributes

Form OP-UA12 (Page 13)

Federal Operating Permit Program

Table 2c: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)

**Subchapter D: Fugitive Emission Control in Petroleum Refining, Natural Gas/Gasoline Processing, and Petrochemical Processes in Ozone
Nonattainment Areas
Texas Commission on Environmental Quality**

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Title 30 TAC			Chapter 115	Fugitive Unit	Components
		Process Drains	ACR	ACR ID No.	Complying with § 115.352(1)	TVP of Process Fluid VOC ≤ 0.044 psia at 68°F	TVP of Process Fluid VOC > 0.044 psia at 68°F
FUGITIVES	R5352-ALL		NO				

Fugitive Emission Unit Attributes

Form OP-UA12 (Page 14)

Federal Operating Permit Program

Table 2d: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)

**Subchapter D: Fugitive Emission Control in Petroleum Refining, Natural Gas/Gasoline Processing, and Petrochemical Processes in Ozone
Nonattainment Areas**

Texas Commission on Environmental Quality

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Title 30 TAC		Chapter 115	Fugitive Unit	Components	(continued)
		Pressure Relief Valves	ACR	ACR ID No.	<ul style="list-style-type: none"> Complying with §115.352(1) 	TVP of Process Fluid VOC ≤ 0.044 psia at 68° F	TVP of Process Fluid VOC > 0.044 psia at 68° F
FUGITIVES	R5352-ALL		NO				

**Fugitive Emission Unit Attributes
Form OP-UA12 (Page 15)**

Federal Operating Permit Program

Table 2e: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)

**Subchapter D: Fugitive Emission Control in Petroleum Refining, Natural Gas/Gasoline Processing, and Petrochemical Processes in Ozone
Nonattainment Areas
Texas Commission on Environmental Quality**

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Title 30 TAC	Chapter 115	Fugitive Unit	Components	(continued)
		Open-ended Valves and Lines	ACR	ACR ID No.	Complying with § 115.352(1)	TVP of Process Fluid VOC ≤ 0.044 psia at 68°F
FUGITIVES	R5352-ALL		NO			

Fugitive Emission Unit Attributes

Form OP-UA12 (Page 16)

Federal Operating Permit Program

Table 2f: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)

**Subchapter D: Fugitive Emission Control in Petroleum Refining, Natural Gas/Gasoline Processing, and Petrochemical Processes in Ozone
Nonattainment Areas
Texas Commission on Environmental Quality**

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Title 30 TAC	Chapter 115	Fugitive Unite	Components	(continued)	
		<ul style="list-style-type: none">Valves (other than pressure relief and open-ended)	ACR	ACR ID No.	Complying with § 115.352(1)	TVP of Process Fluid VOC ≤ 0.044 psia at 68°F	TVP of Process Fluid VOC > 0.044 psia at 68°F
FUGITIVES	R5352-ALL		NO				

Fugitive Emission Unit Attributes

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Federal Operating Permit Program

Table 2g: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)

**Subchapter D: Fugitive Emission Control in Petroleum Refining, Natural Gas/Gasoline Processing, and Petrochemical Processes in Ozone
Nonattainment Areas
Texas Commission on Environmental Quality**

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Title 30 TAC Chapter 115 Fugitive Unit Components (continued)					
		Flanges	ACR	ACR ID No.	Complying with § 115.352(1)	TVP of Process Fluid VOC ≤ 0.044 psia at 68°F	TVP of Process Fluid VOC > 0.044 psia at 68°F
FUGITIVES	R5352-ALL		NO				

**Fugitive Emission Unit Attributes
Form OP-UA12 (Page 18)**

Federal Operating Permit Program

**Table 2h: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter D: Fugitive Emission Control in Petroleum Refining, Natural Gas/Gasoline Processing,
and Petrochemical Processes in Ozone Nonattainment Areas
Texas Commission on Environmental Quality**

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Title 30 TAC Chapter 115 Fugitive Unit Components (continued)					
		Agitators	ACR	ACR ID No.	Complying with § 115.352(1)	TVP of Process Fluid VOC ≤ 0.044 psia at 68°F	TVP of Process Fluid VOC > 0.044 psia at 68°F
FUGITIVES	R5352-ALL		NO				

**Fugitive Emission Unit Attributes
Form OP-UA12 (Page 19)**

Federal Operating Permit Program

Table 2i: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)

**Subchapter D: Fugitive Emission Control in Petroleum Refining, Natural Gas/Gasoline Processing, and Petrochemical Processes in Ozone
Nonattainment Areas
Texas Commission on Environmental Quality**

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Title 30 TAC Chapter 115				Fugitive Unit	Components	(continued)	
		Compressor Seals	ACR	ACR ID No.	Complying with § 115.352(1)	Hydrogen Content to Exceed 50% by Volume	Shaft Seal System	TVP of Process Fluid VOC ≤ 0.044 psia at 68°F	TVP of Process Fluid VOC > 0.044 psia at 68°F
FUGITIVES	R5352-ALL		NO						

**Fugitive Emission Unit Attributes
Form OP-UA12 (Page 20)**

Federal Operating Permit Program

Table 2j: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)

**Subchapter D: Fugitive Emission Control in Petroleum Refining, Natural Gas/Gasoline Processing,
and Petrochemical Processes in Ozone Nonattainment Areas
Texas Commission on Environmental Quality**

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Title 30 TAC		Chapter 115		Fugitive Unit	Components (continued)	
		Pump Seals	ACR	ACR ID No.	Complying with § 115.352(1)	Shaft Seal System	TVP of Process Fluid VOC ≤ 0.044 psia at 68°F	TVP of Process Fluid VOC > 0.044 psia at 68°F
FUGITIVES	R5352-ALL		NO					

Fugitive Emission Unit Attributes

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Federal Operating Permit Program

Table 2k: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)

**Subchapter D: Fugitive Emission Control in Petroleum Refining, Natural Gas/Gasoline Processing, and Petrochemical Processes in Ozone
Nonattainment Areas**

Texas Commission on Environmental Quality

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Components Utilizing Alternative Work Practice in § 115.358	Title 30 TAC Chapter 115 Fugitive Unit Description
FUGITIVES	R5352-ALL		PVOH FUGITIVES

Fugitive Emission Unit Attributes
Form OP-UA12 (Page 138)
Federal Operating Permit Program
Table 16a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter H: Fugitive Emissions (HRVOC)
Texas Commission on Environmental Quality

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID. No.	SOP/GOP Index No.	Title 30 TAC § 115.780 Applicable	• Less Than 250 Components at Site	Weight Percent HRVOC	Title 30 TAC Chapter 115 Fugitive Unit Components		
					Pumps with Shaft Seal System	Compressors with Shaft Seal System	Agitators with Shaft Seal System
FUGITIVES	R5780-ALL	YES	NO	BOTH			

Fugitive Emission Unit Attributes
Form OP-UA12 (Page 139)
Federal Operating Permit Program
Table 16b: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter H: Fugitive Emissions (HRVOC)
Texas Commission on Environmental Quality

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP/GOP Index No.	Title 30 TAC	Chapter 115	Fugitive Unit	Components (continued)				
		Process Drains	ACR	ACR ID No.	Complying with § 115.781(b)(9)	Pressure Relief Valves	ACR	ACR ID No.	Complying with § 115.781(b)(9)
FUGITIVES	R5780-ALL		NO				NO		

Fugitive Emission Unit Attributes
Form OP-UA12 (Page 140)
Federal Operating Permit Program
Table 16c: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter H: Fugitive Emissions (HRVOC)
Texas Commission on Environmental Quality

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Title 30 TAC Chapter 115 Fugitive Unit Components (continued)							
		Open-ended Valves or Lines	ACR	ACR ID No.	Complying with § 115.781(b)(9)	Bypass Line Valves	ACR	ACR ID No.	Complying with § 115.781(b)(9)
FUGITIVES	R5780-ALL		NO				NO		

**Fugitive Emission Unit Attributes
Form OP-UA12 (Page 141)
Federal Operating Permit Program
Table 16d: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter H: Fugitive Emissions (HRVOC)
Texas Commission on Environmental Quality**

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Title 30 TAC Chapter 115 Fugitive Unit Components (continued)							
		Valves (other than pressure relief, open-ended, and bypass line)	ACR	ACR ID No.	Complying with § 115.781(b)(9)	Flanges or Other Connectors	ACR	ACR ID No.	Complying with § 115.781(b)(9)
FUGITIVES	R5780-ALL		NO				NO		

**Fugitive Emission Unit Attributes
Form OP-UA12 (Page 142)**

Federal Operating Permit Program

1. Table 16e: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)

Subchapter H: Fugitive Emissions (HRVOC)

Texas Commission on Environmental Quality

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Title 30 TAC Chapter 115 Fugitive Unit Components (continued)							
		Compressor Seals	ACR	ACR ID No.	Complying with § 115.781(b)(9)	Pump Seals	ACR	ACR ID No.	Complying with § 115.781(b)(9)
FUGITIVES	R5780-ALL		NO				NO		

Fugitive Emission Unit Attributes
Form OP-UA12 (Page 143)
Federal Operating Permit Program
Table 16f: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter H: Fugitive Emissions (HRVOC)
Texas Commission on Environmental Quality

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Title 30 TAC Chapter 115 Fugitive Unit Components (continued)							
		Agitators	ACR	• ACR ID No.	Complying with § 115.781(b)(9)	Heat Exchanger Heads, Sight Glasses, Meters, Gauges, Sampling Connections, Bolted Manways, Hatches, Sump Covers, Junction Box Vents, or Covers and Seals on VOC Water Separators	ACR	ACR ID No.	Complying with § 115.781(b)(9)
FUGITIVES	R5780-ALL		NO				NO		

Fugitive Emission Unit Attributes
Form OP-UA12 (Page 144)
Federal Operating Permit Program
Table 16g: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter H: Fugitive Emissions (HRVOC)
Texas Commission on Environmental Quality

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP/GOP Index No.	Alternative Work Practice in § 115.358	Title 30 TAC Chapter 115 Fugitive Unit Description
FUGITIVES	R5780-ALL		PVOH FUGITIVES

**Fugitive Emission Unit Attributes
Form OP-UA12 (Page 145)**

Federal Operating Permit Program

Table 17a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

**Subpart VVa: Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry
for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006
Texas Commission on Environmental Quality**

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Produces Chemicals	Affected Facility	• Construction/Modification Date	Compliance Option	Design Capacity	Facility Type
FUGITIVES	60VVA-ALL	YES	YES	06+	63H	1000+	OTHER

**Fugitive Emission Unit Attributes
Form OP-UA12 (Page 146)**

Federal Operating Permit Program

Table 17b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

**Subpart VVa: Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry
for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006
Texas Commission on Environmental Quality**

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Title 40 CFR Part 60, Subpart VVa Fugitive Unit Components			
		Pumps			
		Light Liquid Service	EEL	EEL ID No.	Complying with 60.482-2a
FUGITIVES	60VVA-ALL		NO		

Fugitive Emission Unit Attributes

Form OP-UA12 (Page 147)

Federal Operating Permit Program

Table 17c: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

**Subpart VVa: Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry
for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006**

Texas Commission on Environmental Quality

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Title 40 CFR Part 60, Subpart VVa Fugitive Unit Components (continued)				
		Compressor				Pressure Relief Devices
		Compressor	EEL	EEL ID No.	Complying with 60.482-3a	Gas/Vapor Service
FUGITIVES	60VVA-ALL		NO			

**Fugitive Emission Unit Attributes
Form OP-UA12 (Page 148)**

Federal Operating Permit Program

Table 17d: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

**Subpart VVa: Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry
for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006
Texas Commission on Environmental Quality**

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Title 40 CFR	Part VVa	Fugitive Unit	Components	(continued)			
		Sampling	Connection	System		Valves			
		Sampling Connection	EEL	EEL ID No.	Complying with 60.482-5a	Open-Ended	EEL	EEL ID No.	Complying with 60.482-6a
FUGITIVES	60VVA-ALL		NO				NO		

**Fugitive Emission Unit Attributes
Form OP-UA12 (Page 149)**

Federal Operating Permit Program

Table 17e: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

**Subpart VVa: Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry
for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006
Texas Commission on Environmental Quality**

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Title 40 CFR Part 60, Subpart VVa Fugitive Unit Components (continued)				
		Valves (continued)				
		Gas/Vapor or Light Liquid Service	2.0%	EEL	EEL ID No.	Complying with 60.482-7a
FUGITIVES	60VVA-ALL			NO		

Fugitive Emission Unit Attributes

Form OP-UA12 (Page 150)

Federal Operating Permit Program

Table 17f: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

**Subpart VVa: Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry
for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006**

Texas Commission on Environmental Quality

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Title 40 CFR Part 60, Subpart VVa Fugitive Unit Components (continued)							
		Pumps				Valves			
		Heavy Liquid Service	EEL	EEL ID No.	Complying with 60.482-8a	Heavy Liquid Service	EEL	EEL ID No.	Complying with 60.482-8a
FUGITIVES	60VVA-ALL		NO				NO		

**Fugitive Emission Unit Attributes
Form OP-UA12 (Page 151)**

Federal Operating Permit Program

Table 17g: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

**Subpart VVa: Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry
for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Title 40 CFR Part 60, Subpart VVa Fugitive Unit Components (continued)							
		Pressure Relief Devices				Connectors			
		Heavy or Light Liquid Service	EEL	EEL ID No.	Complying with 60.482-8a	Heavy Liquid Service	EEL	EEL ID No.	Complying with 60.482-8a
FUGITIVES	60VVA-ALL		NO				NO		

Fugitive Emission Unit Attributes

Form OP-UA12 (Page 152)

Federal Operating Permit Program

Table 17h: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

**Subpart VVa: Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry
for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006
Texas Commission on Environmental Quality**

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Title 40 CFR Part 60, Subpart VVa Fugitive Unit Components (continued)				
		Closed-Vent Systems and Control Devices				
		Vapor Recovery System	EEL	EEL ID No.	Complying with 60.482-10a	Control Device ID.
FUGITIVES	60VVA-ALL	NO				

Fugitive Emission Unit Attributes

Form OP-UA12 (Page 153)

Federal Operating Permit Program

Table 17i: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

**Subpart VVa: Standards of Performance For Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry
for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006
Texas Commission on Environmental Quality**

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Title 40 CFR Part 60, Subpart VVa Fugitive Unit Components (continued)				
		Closed Vent Systems and Control Devices (continued)				
		Enclosed Combustion Device	EEL	EEL ID No.	Complying With 60.482-10a	Control Device ID.
FUGITIVES	60VVA-ALL	NO				

**Fugitive Emission Unit Attributes
Form OP-UA12 (Page 154)**

Federal Operating Permit Program

Table 17j: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

**Subpart VVa: Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry
for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006
Texas Commission on Environmental Quality**

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Title 40 CFR Part 60, Subpart VVa Fugitive Unit Components (continued)				
		Control Devices				
		Flare	EEL	EEL ID No.	Complying with 60.482-10a	Control Device ID.
FUGITIVES	60VVA-ALL	NO				

Fugitive Emission Unit Attributes

Form OP-UA12 (Page 155)

Federal Operating Permit Program

2. Table 17k: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

**Subpart VVa: Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry
for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006**

Texas Commission on Environmental Quality

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Title 40 CFR Part 60, Subpart VVa Fugitive Unit Components (continued)				
		Control Devices				Connectors
		CVS	EEL	EEL ID No.	Complying with 60.482-10a	Gas/Vapor or Light Liquid Service
FUGITIVES	60VVA-ALL	NO				

Fugitive Emission Unit Attributes

Form OP-UA12 (Page 156)

Federal Operating Permit Program

Table 17I: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

**Subpart VVa: Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry
for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006**

Texas Commission on Environmental Quality

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Title 40 CFR Part 60, Subpart VVa Fugitive Unit Components (continued)
		Title 40 CFR Part 60, Subpart VVa Fugitive Unit Description
FUGITIVES	60VVA-ALL	PVOH FUGITIVES

**Texas Commission on Environmental Quality
Cooling Tower Attributes
Form OP-UA13 (Page 1)
Federal Operating Permit Program**

**Table 1: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart Q: National Emission Standards for Hazardous Air Pollutants (HAPs) for Industrial Process Cooling Towers**

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Used Compounds Containing Chromium on or After September 8, 1994	Initial Start-up Date
CTOWER	63Q	NO	

Texas Commission on Environmental Quality

Cooling Tower Attributes

Form OP-UA13 (Page 3)

Federal Operating Permit Program

Table 3a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)

Subchapter H, Division 2: Cooling Tower Heat Exchange Systems

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Cooling Tower Heat Exchange Systems Exemptions	Alternative Monitoring	Modified Monitoring	Approved Monitoring ID No.
CTOWER	R5767-1	NONE	NO	NO	
CTOWER	R5767-2	NONE	NO	NO	

Texas Commission on Environmental Quality

Cooling Tower Attributes

Form OP-UA13 (Page 4)

Federal Operating Permit Program

Table 3b: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)

Subchapter H, Division 2: Cooling Tower Heat Exchange Systems

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Jacketed Reactor	Design Capacity	Finite Volume System	Flow Monitoring/ Testing Method	Total Strippable VOC	On-Line Monitor
CTOWER	R5767-1	NO	8000+	NO	DATA	NO	NO
CTOWER	R5767-2	NO	8000+	NO	INLET	NO	NO

Texas Commission on Environmental Quality

Cooling Tower Attributes

Form OP-UA13 (Page 7)

Federal Operating Permit Program

Table 6: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing

Date	Permit No.:	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP Index No.	Monitoring
CTOWER	63FFFF-1	YES

**Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 3)**

Federal Operating Permit Program

Table 2a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)

Subchapter B: Vent Gas Control

Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
08/04/2023	O3759	RN106155849

Emission Point ID No.	SOP/GOP Index No.	Chapter 115 Division	Combustion Exhaust	Vent Type	Total Uncontrolled VOC Weight	Combined 24-Hour VOC Weight	VOC Concentration	VOC Concentration or Emission Rate at Maximum Operating Conditions
C3111HDR	R5121-1	NO	NO	REGVAPPL				
C5111HDR	R5121-1	NO	NO	REGVAPPL				
C706HDR	R5121-1	NO	NO	REGVAPPL				
FILVT	R5121-1	NO	NO	REGVAPPL		100-	612+	YES
ANLYZVT	R5121-1	NO	NO	REGVAPPL		100-	612+	YES
FL051HDR	R5121-1	NO	NO	DISTOPER				

**Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 4)**

Federal Operating Permit Program

Table 2b: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)

Subchapter B: Vent Gas Control

Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
08/04/2023	O3759	RN106155849

Emission Point ID No.	SOP Index No.	Alternate Control Requirement	ACR ID No.	Control Device Type	Control Device ID No.
C3111HDR	R5121-1	NONE		OTHER	C3111SCRUB, C3112SCRUB
C5111HDR	R5121-1	NONE		OTHER	C5111SCRUB
C706HDR	R5121-1	NONE		OTHER	C706SCRUB
FL051HDR	R5121-1	NONE		FLARE	FL-051

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 30)

Federal Operating Permit Program

Table 12a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter H, Division 1: Highly-Reactive Volatile Organic Compounds-Vent Gas Control
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
08/04/2023	O3759	RN106155849

Emission Point ID No.	SOP Index No.	HRVOC Concentration	Max Flow Rate	Exempt Date	Vent Gas Stream Control
FL051HDR	R5722-1	NO	YES	NO	

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 32)

Federal Operating Permit Program

Table 13a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart FFFF: National Emission Standards for Hazardous Air Pollutants:
Miscellaneous Organic Chemical Manufacturing - Continuous Process Vents
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
08/04/2023	O3759	RN106155849

Emission Point ID No.	SOP Index No.	Emission Standard	Comb Device	95% Scrubber	PERF Test	Negative Pressure	Bypass Line
C3111HDR	63FFFF-1	CDPMV					
C3111HDR	63FFFF-2	CD98					
C5111HDR	63FFFF-1	CDPMV					
C5111HDR	63FFFF-2	CD98					
C706HDR	63FFFF-1	CDPMV					
C706HDR	63FFFF-2	CD98					
FL051HDR	63FFFF-1	BLWFLR					
FL051HDR	63FFFF-2	BLWFLR					
FL051HDR	63FFFF-3	BLWFLR					

**Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 35)**

Federal Operating Permit Program

**Table 13d: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart FFFF: National Emission Standards for Hazardous Air Pollutants:
Miscellaneous Organic Chemical Manufacturing - Continuous Process Vents
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
08/04/2023	O3759	RN106155849

Emission Point ID No.	SOP Index No.	Designated GRP1	Designated HAL	Determined HAL	Prior Eval	Assessment Waiver	Assessment Waiver ID	Negative Pressure	Bypass Line
FL051HDR	63FFFF-1	YES	NO	NO	NO	NO		NO	NONE
FL051HDR	63FFFF-2	YES	NO	NO	NO	NO		NO	FLOWIND
FL051HDR	63FFFF-3	YES	NO	NO	NO	NO		NO	CARSEAL

**Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 36)**

Federal Operating Permit Program

**Table 13e: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart FFFF: National Emission Standards for Hazardous Air Pollutants:
Miscellaneous Organic Chemical Manufacturing - Continuous Process Vents
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
08/04/2023	O3759	RN106155849

Emission Point ID No.	SOP Index No.	Designated GRP1	Small Device	1257A1	1257A1 Device Type	1257A1 Device ID	Alt 63SS Mon Parameters	Alt 63SS Mon ID	CEMS	SS Device Type	SS Device ID
C3111HDR	63FFFF-1	YES	NO				NO		NO	ABS	C3111SCRUB, C3112SCRUB
C3111HDR	63FFFF-2	YES	NO				NO		NO	ABS	C3111SCRUB, C3112SCRUB
C5111HDR	63FFFF-1	YES	NO				NO		NO	ABS	C5111SCRUB
C5111HDR	63FFFF-2	YES	NO				NO		NO	ABS	C5111SCRUB
C706HDR	63FFFF-1	YES	NO				NO		NO	ABS	C706SCRUB
C706HDR	63FFFF-2	YES	NO				NO		NO	ABS	C706SCRUB

**Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 37)**

Federal Operating Permit Program

**Table 13f: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart FFFF: National Emission Standards for Hazardous Air Pollutants:
Miscellaneous Organic Chemical Manufacturing - Continuous Process Vents
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
08/04/2023	O3759	RN106155849

Emission Point ID No.	SOP Index No.	Meets 63.988(b)(2)	Water	Designated HAL	Determined HAL
C3111HDR	63FFFF-1		YES	NO	NO
C3111HDR	63FFFF-2		YES	NO	NO
C5111HDR	63FFFF-1		YES	NO	NO
C5111HDR	63FFFF-2		YES	NO	NO
C706HDR	63FFFF-1		YES	NO	NO
C706HDR	63FFFF-2		YES	NO	NO
FL051HDR	63FFFF-1			NO	NO
FL051HDR	63FFFF-2			NO	NO
FL051HDR	63FFFF-3			NO	NO

**Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 38)**

Federal Operating Permit Program

Table 13g: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

**Subpart FFFF: National Emission Standards for Hazardous Air Pollutants:
Miscellaneous Organic Chemical Manufacturing - Continuous Process Vents
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
08/04/2023	O3759	RN106155849

Emission Point ID No.	SOP Index No.	HAL Device Type	HAL Device ID	Prior Eval	Assessment Waiver	Assessment Waiver ID	Formaldehyde	Negative Pressure	Bypass Line
C3111HDR	63FFFF-1	NONE		NO	NO		NO	NO	NONE
C3111HDR	63FFFF-2	NONE		NO	NO		NO	NO	NONE
C5111HDR	63FFFF-1	NONE		NO	NO		NO	NO	NONE
C5111HDR	63FFFF-2	NONE		NO	NO		NO	NO	NONE
C706HDR	63FFFF-1	NONE		NO	NO		NO	NO	NONE
C706HDR	63FFFF-2	NONE		NO	NO		NO	NO	NONE
FL051HDR	63FFFF-1	NONE		NO	NO		NO	NO	NONE
FL051HDR	63FFFF-2	NONE		NO	NO		NO	NO	FLOWIND
FL051HDR	63FFFF-3	NONE		NO	NO		NO	NO	CARSEAL

Solvent Degreasing Machine Attributes
Form OP-UA16 (Page 1) Federal Operating Permit Program
Table 1: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115) Subchapter E: Solvent Using Processes
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
08/04/2023	O3759	RN106155849

Unit ID No.	SOP/GOP Index No.	Solvent Degreasing Machine Type	Alternate Control Requirement (ACR)	Alternate Control Requirement ID No.	Solvent Sprayed	Solvent Vapor Pressure	Solvent Heated	Parts Larger Than Drainage	Drainage Area	Disposal in Enclosed Containers	Solvent/Air Interface Area	Emission Control Combinations
<i>DEGREASE</i>	<i>R5115-1</i>	<i>COLD</i>	<i>NO</i>		<i>YES</i>	<i>0.6-</i>	<i>NO</i>	<i>NO</i>	<i>16-</i>	<i>YES</i>		

**Texas Commission on Environmental Quality
Wastewater Unit Attributes
Form OP-UA19 (Page 1)
Federal Operating Permit Program**

**Table 1a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter B: Industrial Wastewater**

Date: 08/04/2023	Permit No.: O3759	RN Number: RN106155849
Area Name: PVA Plant		CN Number: CN603315953

Unit ID No.	SOP Index No.	Petroleum Refinery	Alternate Control Requirement	ACR ID No.	90% Overall Control Option	Safety Hazard Exemption	Safety Hazard Exemption ID No.
V-606	R5142-1	NO	NO		NO	NO	
T-061	R5142-1	NO	NO		NO	NO	
T-920	R5142-1	NO	NO		NO	NO	

**Texas Commission on Environmental Quality
Wastewater Unit Attributes
Form OP-UA19 (Page 2)
Federal Operating Permit Program**

**Table 1b: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter B: Industrial Wastewater**

Date: 08/04/2023	Permit No.: O3759	RN Number: RN106155849
Area Name: PVA Plant		CN Number: CN603315953

Unit ID No.	SOP Index No.	Wastewater Component Type	Roof or Seal Type	Control Devices	Control Device ID No.	Monitoring Type
V-606	R5142-1	OTHER	NONE	OTHER	C706SCRUB	NO
T-061	R5142-1	OTHER	NONE	OTHER	C061SCRUB	NO
T-920	R5142-1	OTHER	NONE	FLARE	FL-051	NO

**Chemical Manufacturing/Elastomer/Thermoplastic Process Unit Attributes
Form OP-UA60 (Page 8)**

Federal Operating Permit Program

Table 5a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

**Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic
Chemical Manufacturing - MCPU Processes**

Date: 08/04/2023	Permit No.: O3759	Regulated Entity No.: RN106155849
Area Name: PVA Plant		Customer Reference No.: CN603315953

Process ID No.	SOP Index No.	Ammonium Sulfate	Other Operations	63.100 CMPU	G2/<1000 Lb/Yr	2525E1
PROPVOH	63FFFF-1	NO	YES	NO	NO	

**Chemical Manufacturing/Elastomer/Thermoplastic Process Unit Attributes
Form OP-UA60 (Page 9)**

Federal Operating Permit Program

Table 5b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

**Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic
Chemical Manufacturing - MCPU Processes**

Date: 08/04/2023	Permit No.: O3759	Regulated Entity No.: RN106155849
Area Name: PVA Plant		Customer Reference No.: CN603315953

Process ID No.	SOP Index No.	Startup 2003	Shared Batch Vent	PUG	Startup 2002	PP Alt	Cont Proc
PROPVOH	63FFFF-1	NO	NO	NO	NO		

**Chemical Manufacturing/Elastomer/Thermoplastic Process Unit Attributes
Form OP-UA60 (Page 10)**

Federal Operating Permit Program

Table 5c: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

**Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic
Chemical Manufacturing - MCPU Processes**

Date: 08/04/2023	Permit No.: O3759	Regulated Entity No.: RN106155849
Area Name: PVA Plant		Customer Reference No.: CN603315953

Process ID No.	SOP Index No.	>1000 Lb/Yr	Reduction	New Source	HAP Metals	Fabric Filter	Small CD	Design Eval	Batch Proc Vents
PROPVOH	63FFFF-1	NO		YES	NO				NO

Permit By Rule Supplemental Table (Page 1)

Table A: Registered Permits by Rule (30 TAC Chapter 106) for the Application Area

Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
08/04/2023	O3759	RN106155849

Unit ID No.	Registration No.	PBR No.	Registration Date
C3111SCRUB	147877	106.262	9/14/2017
FUGITIVES	147877	106.262	9/14/2017
FUGITIVES	172343	106.261 106.262	4/27/2023

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Table B: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for the Application Area

Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
08/04/2023	O3759	RN106155849

Unit ID No.	PBR No.	Version No./Date
FUGITIVES	106.261	11/1/2003
FUGITIVES	106.262	11/1/2003
PLTMSS	106.263	11/1/2001
PLTRPL	106.264	09/04/2000
PLTREF	106.373	09/04/2000
DEGREASE	106.454	11/01/2001
CTLOADING	106.472	09/04/2000
DIESELTK	106.473	09/04/2000
FOAMTK	106.476	09/04/2000
V-021	106.478	09/04/2000
V-022	106.478	09/04/2000
V-023	106.478	09/04/2000
V-024	106.478	09/04/2000
EPN12TK	106.478	09/04/2000
EPN13TK	106.478	09/04/2000
PORTTK	106.478	09/04/2000
EMGEN	106.511	09/04/2000

Permit By Rule Supplemental Table (Page 4)

Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area

Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
08/04/2023	O3759	RN106155849

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
C3111SCRUB	106.262	147877	Monitor the liquid flow rate once per week. The option to monitor the liquid flow rate, liquid supply pressure, and the liquid flow rate and gas flow rate are provided as monitoring options because monitoring these parameters can indicate malfunctions in the liquid pumping equipment, blockage of pipes or spray nozzles. Monitor the outlet water temperature hourly. The scrubbers were designed to operate at a maximum outlet scrubbing liquid temperature of 90°F.
FUGITIVES	106.262	147877	Each component in the process unit must be monitored according to the requirements of Subchapter D, Division 3 of Ch. 115. A component is considered repaired: for all other components, when the component is demonstrations to no longer have a leak after adjustments or alterations to the component by the normal monitoring method required under Ch. 115 Subchapter H.
FUGITIVES	106.261 106.262	172343	Each component in the process unit must be monitored according to the requirements of Subchapter D, Division 3 of Ch. 115. A component is considered repaired: for all other components, when the component is demonstrations to no longer have a leak after adjustments or alterations to the component by the normal monitoring method required under Ch. 115 Subchapter H.