Texas Commission on Environmental Quality

Title V Existing

3963

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	NATGASOLINE METHANOL PLANT
Does the site have a physical address?	No
Because there is no physical address, describe how to locate this site:	2366 Sulphur Plant Road
City	Beaumont
State	TX
ZIP	77705
County	JEFFERSON
Latitude (N) (##.######)	30.012222
Longitude (W) (-###.######)	94.036388
Primary SIC Code	2869
Secondary SIC Code	
Primary NAICS Code	325199
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN106586795
What is the name of the Regulated Entity (RE)?	BEAUMONT GAS TO GASOLINE PLANT
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	2366 SULPHUR PLANT RD
City	BEAUMONT
State	TX
ZIP	77705
County	JEFFERSON
Latitude (N) (##.######)	30.03143
Longitude (W) (-###.######)	-94.05388
Facility NAICS Code	
What is the primary business of this entity?	CHEMICAL MANUFACTURING

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN604256412
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Natgasoline LLC
Texas SOS Filing Number	801689918
Federal Tax ID	680682889
State Franchise Tax ID	32049571162
State Sales Tax ID	

Local Tax ID	
DUNS Number	79934278
Number of Employees	101-250
Independently Owned and Operated?	No

Responsible Official Contact

Person TCEQ should contact for questions about this application:	
Organization Name	NATGASOLINE LLC
Prefix	MR
First	ROBERT
Middle	
Last	WIESS
Suffix	
Credentials	
Title	COMPLIANCE MANAGER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	2366 SULPHUR PLANT RD
Routing (such as Mail Code, Dept., or Attn:)	
City	BEAUMONT
State	TX
ZIP	77705
Phone (###-###-####)	4093444900
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	robert.wiess@natgasoline.com

Technical Contact

Person TCEQ should contact for questions about this application:	
Select existing TC contact or enter a new contact.	New Contact
Organization Name	Natgasoline LLC
Prefix	MR
First	Scott
Middle	
Last	Kolb
Suffix	
Credentials	
Title	Senior Environmental Engineer
Enter new address or copy one from list:	Responsible Official Contact
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	2366 SULPHUR PLANT RD

Routing (such as Mail Code, Dept., or Attn:)	
City	BEAUMONT
State	TX
ZIP	77705
Phone (###-###-####)	4093444932
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	scott.kolb@natgasoline.com

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	30 Deg 0 Min 44 Sec
3) Permit Longitude Coordinate:	94 Deg 2 Min 11 Sec
4) Is this submittal a new application or an update to an existing application?	Update
4.1. Select the permit/project number for which this update should be applied.	3963-36358
5) 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 Void Request Form

Attach any other necessary information needed to complete the permit.

[File Properties]	
File Name	Form OP-ACPS (8.13.2025).pdf
Hash	0C1A5EA518C4993B818284F2AB183208887F281B34504A0A5D20F51E2C0183E6
MIME-Type	application/pdf
[File Properties]	
File Name	Updated OP-CRO1 Form Signed 8_13_2025.pdf
Hash	AF8459E8EB67F7F0B345669E6B02C0A9D9A2CC7D950C11432F4A422AEAC1C987
MIME-Type	application/pdf

An additional space to attach any other necessary information needed to complete the permit.

Certification

I certify that I am the Responsible Official 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 Robert G Wiess JR, the owner of the STEERS account ER113976.
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 enforcemer 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 3963.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEC

OWNER OPERATOR Signature: Robert G Wiess JR OWNER OPERATOR

Account Number:	ER113976
Signature IP Address:	38.140.215.210
Signature Date:	2025-08-14
Signature Hash:	331ED44272C45FC87793895AE009D6A3917FD27E59AE1AAB5DA55AF9D442817E
Form Hash Code at time of Signature:	D66D04720538B7FF967CAF127738CC52EF137FA2B61AF3B09B69CC7BF76BFA46

Submission

Reference Number:	The application reference number is 808783
Submitted by:	The application was submitted by ER113976/Robert G Wiess JR
Submitted Timestamp:	The application was submitted on 2025-08-14 at 16:15:10 CDT

Submitted From:	The application was submitted from IP address 38.140.215.210
Confirmation Number:	The confirmation number is 671476
Steers Version:	The STEERS version is 6.92
Permit Number:	The permit number is 3963

Additional Information

Application Creator: This account was created by Jordan S Hollier

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: RN106586795	
CN: CN604256412	
Account No.: JEA035H	
Permit No.: O3963	
Project No.: 36358	
Area Name: Methanol Plant	
Company Name: Natgasoline LLC	
II. Certification Type *(Please mark appropriate box)*	
☒ Responsible Official Representative	☐ Duly Authorized Representative
III. Submittal Type *(Please mark appropriate box) (Only one response can be accepted per form)*	
☐ SOP/TOP Initial Permit Application	☐ Permit Revision, Renewal, or Reopening
☐ GOP Initial Permit Application	☒ Update to Permit Application
☐ 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, Robert Wiess certify that I am the RO

(Certifier Name printed or typed) *(RO or DAR)*

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:
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).

Time Period: From _____ to _____

(Start Date) *(End Date)*

Specific Dates: 04/03/2025 05/01/2025 _____ _____

(Date 1) *(Date 2)* *(Date 3)* *(Date 4)*

_____ _____

(Date 5) *(Date 6)*

Signature: [signature] Signature Date: 8/13/25

Title: Compliance Manager

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 08/13/2025	**Regulated Entity No.: RN106586795**	**Permit No.: O3963**
Company Name: Natgasoline LLC		**Area Name: Methanol 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**	
The *Responsible Official* 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.		
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?	☒ YES ☐ NO
2.	Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	☒ YES ☐ NO
3.	If the response to Item B.2, above, is "Yes," indicate the total number of Part 2 attachments included in this submittal. *(For reference only)*	4
*	*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.* *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.*	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 08/13/2025	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): B-01001 Reformer

SOP Index No.:

Pollutant: NH_3

Applicable Requirement

Citation	Text Description
NSR Permit 107764, SC 6C	Limit shall not exceed 10 PPMVD NH_3
	corrected to 3% O2 on an hourly average

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
SC 17 CEMS monitoring	Process data analysis	Semi-annual deviation report (SDR) for reporting period 1/1/2024 to 6/30/2024, Item 3

3. Non-compliance Situation Description

NH_3 emissions exceeded 10 PPMVD in reformer stack

4. Corrective Action Plan Description

Natgasoline Operations will revise existing operator training and standard operating procedures to expand the NOx operating window to include a slight increase in allowable NOx emissions and as a result reduce NH3 injection.

5. List of Activities/Milestones to Implement the Corrective Action Plan

Based on our new permit limits for NOx energy (0.015 lb/mmbtu), in the near term Natgasoline Operations will revise existing operator training and standard operating procedures to expand the NOx operating window to include a slight increase in allowable NOx emissions and as a result reduce NH3 injection. It is believed that with optimization, both limits can be met. With the prior NOx energy permit limits, it was a challenge to maintain NOx in compliance without at least some periodic exceedance on ammonia emissions. Estimated implementation date of Q3 2025.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 08/13/2025	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOV of 1/12/2024	03/04/2024
7. Progress Report Submission Schedule	
Progress reports will be submitted semiannually as part of the semiannual deviation report until corrective	
actions are complete or compliance is achieved.	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 08/13/2025	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): B-01001 Reformer

SOP Index No.:

Pollutant: NH_3

Applicable Requirement

Citation	Text Description
NSR Permit 107764 MAERT	Permitted emissions

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
MAERT exceedance	lb/hr limit	Semi-annual deviation report (SDR) for reporting period 1/1/2024 to 6/30/2024, Item 4

3. Non-compliance Situation Description

Permit exceedance in lb/hr

4. Corrective Action Plan Description

Natgasoline Operations will revise existing operator training and standard operating procedures to expand the NOx operating window to include a slight increase in allowable NOx emissions and as a result reduce NH3 injection.

5. List of Activities/Milestones to Implement the Corrective Action Plan

Based on our new permit limits for NOx energy (0.015 lb/mmbtu), Natgasoline Operations will revise existing operator training and standard operating procedures to expand the NOx operating window to include a slight increase in allowable NOx emissions and as a result reduce NH3 injection. It is believed that with optimization, both limits can be met. With the prior NOx energy permit limits, it was a challenge to maintain NOx in compliance without at least some periodic exceedance on ammonia emissions.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 08/13/2025	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOV of 1/12/2024	03/04/2024
7. Progress Report Submission Schedule	
Progress reports will be submitted semiannually as part of the semiannual deviation report until corrective	
actions are complete or compliance is achieved.	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 08/13/2025	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): B-01001 Reformer

SOP Index No.:

Pollutant: N/A

Applicable Requirement

Citation	Text Description
NSR Permit 107764, SC 8C	The percent of natural gas, on an hourly basis, shall not
	exceed the maximum percent of natural gas established
	during performance testing

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
NSR Permit 107764, SC 8C	Natural gas percentage	Semi-annual deviation report (SDR) for reporting period 1/1/2024 to 6/30/2024, Item 6

3. Non-compliance Situation Description

Reformer operated above the maximum total natural gas established through performance testing.

4. Corrective Action Plan Description

Natgasoline has a performance test tentatively scheduled for the first quarter of 2025 to reestablish the maximum percent of natural gas operating condition.

5. List of Activities/Milestones to Implement the Corrective Action Plan

Reestablish the maximum percent of natural gas through a tentatively scheduled performance test in 2025.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 08/13/2025	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOE of 1/12/2024	03/04/2024
7. Progress Report Submission Schedule	
Progress reports will be submitted semiannually as part of the semiannual deviation report until corrective	
actions are complete or compliance is achieved.	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 08/13/2025	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): B-14001 Aux Boiler

SOP Index No.:

Pollutant: $PM_{2.5}$

Applicable Requirement

Citation	Text Description
NSR Permit 107764 MAERT	Permitted emissions

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
MAERT exceedance	lb/hr limit	Semi-annual deviation report (SDR) for reporting period 1/1/2024 to 6/30/2024, Item 14

3. Non-compliance Situation Description

PM 2.5 lb/hr emissions exceeded maximum allowable emission rate during normal operating conditions as per MAERT Table.

4. Corrective Action Plan Description

The previous performance test did not speciate PM2.5 from PM. The emissions from PM2.5 were assumed to be equal to PM10. Natgasoline will conduct a new performance test in the first quarter of 2025 to speciate PM.

5. List of Activities/Milestones to Implement the Corrective Action Plan

Reestablish the PM2.5 emissions limit through a tentatively scheduled performance test in 2025.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 08/13/2025	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC	Area Name: Methanol Plant	

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**

7. Progress Report Submission Schedule
Progress reports will be submitted semiannually as part of the semiannual deviation report until corrective actions are complete or compliance is achieved.

From:	John Walker
To:	"David Lemoine"; "Jordan Hollier"
Cc:	"Robert Wiess"; "Scott Kolb"; "Philip Curwick"
Subject:	RE: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant
Date:	Wednesday, August 13, 2025 12:09:00 PM
Attachments:	20250225-06_Form OP-ACPS (2.14.2025).pdf image001.jpg image002.png

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Good Afternoon,

In addition to the requested OP-CRO1, please submit the following information:

1. The Form OP-ACPS submitted in STEERS on 02/25/2025 needs to be updated. I have attached what was submitted for reference.

   Section 7. of the Form, the "Progress Report Submission Schedule", needs to include additional language. Currentl, each Application Compliance Plan and Schedule in section 7 states "September 2025" and this language has been determined to be insufficient.

   I am recommending you use the following language: "Progress reports will be submitted semiannually as part of the semiannual deviation report until corrective actions are complete or compliance is achieved."

   Please provide the updated OP-ACPS for the required units with the necessary updates.

2. We spoke on the phone regarding Form OP-CRO1 and you were able to find the appropriate Form OP-CRO1. Provided I receive the updated Form OP-CRO1 and OP-ACPS in STEERS by **08/14/2025**, the PNAP will be issued on 08/15/2025.

Please let me know if you have any questions.

Thank you for your cooperation.
Sincerely,
John Walker
Team Leader
OA/Air Permits Division/OP Section
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087
John.Walker@tceq.texas.gov

Phone: (512) 239-1277



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

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From: John Walker
Sent: Wednesday, August 13, 2025 11:03 AM
To: David Lemoine ; Jordan Hollier
Cc: Robert Wiess ; Scott Kolb ; Philip Curwick
Subject: RE: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant

Good Morning,

Please hold off on submitting the corrected Form OP-CRO1. There is one deficiency in regard to the Compliance Plan and Schedules identified by my section manger. I will get with you shortly with a request for what exactly is required to correct the deficiency.

When I notify you of the deficiency, you should be able to provide the corrected information and the requested OP-CRO1, at the same time in a STEERS update.

Sincerely,

John Walker (x1277)
Team Leader – Title V

From: David Lemoine <dlemoine@compliance-sg.com>
Sent: Wednesday, August 13, 2025 10:13 AM
To: John Walker <John.Walker@tceq.texas.gov>; Jordan Hollier <jhollier@compliance-sg.com>
Cc: Robert Wiess <Robert.Wiess@natgasoline.com>; Scott Kolb <scott.kolb@natgasoline.com>; Philip Curwick <pcurwick@compliance-sg.com>
Subject: RE: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant

John,
The most recent version of the OP-CRO1 form does not include a check box in section 2 for the "Responsible Official" only "Designated Representative". We can use the older version if you would like. Please give us call or email to discuss.
Thank you,
David C. Lemoine

From: John Walker <John.Walker@tceq.texas.gov>
Sent: Wednesday, August 13, 2025 9:59 AM
To: Jordan Hollier <jhollier@compliance-sg.com>
Cc: Robert Wiess <Robert.Wiess@natgasoline.com>; Scott Kolb <scott.kolb@natgasoline.com>; David Lemoine <dlemoine@compliance-sg.com>; Philip Curwick <pcurwick@compliance-sg.com>
Subject: RE: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant

Good Morning,

I reviewed the Form OP-CRO1 submitted. It seems that page 2 of Form OP-CRO1 for Acid Rain Requirements was signed and submitted which identified Mr. Wiess as a "Designated Representative" (DR) on section II of the form. Form OP-CRO1 will need to be resubmitted.

Form OP-CRO1 Page 1 should be submitted instead identifying Mr. Wiess as the "Responsible Official Representative" (RO) in Section II.

Please submit the corrected Form OP-CRO1 as soon as possible but no later than **08/14/2025.**

Please let me know if you have any questions.

Sincerely,

John Walker
Team Leader
OA/Air Permits Division/OP Section
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087
John.Walker@tceq.texas.gov
Phone: (512) 239-1277



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

---

From: Jordan Hollier <jhollier@compliance-sg.com>
Sent: Wednesday, August 13, 2025 8:58 AM
To: John Walker <John.Walker@tceq.texas.gov>
Cc: Robert Wiess <Robert.Wiess@natgasoline.com>; Scott Kolb <scott.kolb@natgasoline.com>; David Lemoine <dlemoine@compliance-sg.com>; Philip Curwick <pcurwick@compliance-sg.com>
Subject: RE: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant

John,
Please see the attached signed OP-CRO1 certifying the updates from 04/03/2025 and 05/01/2025 . The form has been submitted on STEERS.
Thank you,

Jordan Hollier
Compliance Solutions Group
16851 Jefferson Highway, Suite 6D
Baton Rouge, LA 70817
Phone: (225) 754-0405

From: John Walker <John.Walker@tceq.texas.gov>
Sent: Monday, August 11, 2025 6:57 PM
To: David Lemoine <dlemoine@compliance-sg.com>; Philip Curwick <pcurwick@compliance-sg.com>
Cc: Robert Wiess <Robert.Wiess@natgasoline.com>; Scott Kolb <scott.kolb@natgasoline.com>; Jordan Hollier <jhollier@compliance-sg.com>
Subject: RE: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant

Good evening,

Please submit the following requested information as soon as possible but no later than **08/14/2025:**

1. Please submit Form OP-CRO1 to certify application update(s) and WDP approval. The specific dates of 04/03/2025 and 05/01/2025 should be used and the Submittal Type should be marked: Update to Permit Application.

   The STEERS updates I received on 04/03/2025 and 05/01/2025 were not certified. These STEERS updates were signed and submitted by Mr. Miguel Martinez who was not designated as the Responsible Official (RO) at the time.

   The project is currently with my Section Manager for review of the issuance of the Public Notice Authorization Package (PNAP). Provided no deficiencies are found and I receive the requested Form OP-CRO1 by 08/14/2025, the Public Notice Authorization Package will be issued on 08/15/2025.

If you have any questions, please contact me.

Thank you for your cooperation.

Sincerely,
John Walker
Team Leader
OA/Air Permits Division/OP Section
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087
John.Walker@tceq.texas.gov
Phone: (512) 239-1277

How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: David Lemoine <dlemoine@compliance-sg.com>
Sent: Wednesday, August 6, 2025 7:51 AM
To: John Walker <John.Walker@tceq.texas.gov>; Philip Curwick <pcurwick@compliance-sg.com>
Cc: Robert Wiess <Robert.Wiess@natgasoline.com>; Scott Kolb <scott.kolb@natgasoline.com>; Jordan Hollier <jhollier@compliance-sg.com>
Subject: RE: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant

Good morning John,

The AMOC was submitted as an alternate analyzer method (Tunable Diode Laser Ammonia analyzer) to demonstrate compliance for the Reformer (EPN B-01001) and Auxiliary Boiler (B-14001) which are each equipped with selective catalytic reduction (SCR) to control NOx emissions and resulting in collateral NH3 “slip” emissions.

I agree that the method for monitoring ammonia emissions for demonstrating compliance did not change. We have always utilized the CEMs but the analyzer for measuring ammonia was changed from Chemiluminescence Detection (CLD) extractive technology NOx analyzer to a TDL. The TDL is a direct read ammonia analyzer vs. difference between total NH3/NOx and the unconverted NOx (as measured by the NOx analyzer). This method is referred to as the NOx Differential calculation technique.

Attached for your review is the AMOC approval letter.

Please give us a call if we need to discuss further at 225 754-0405.

Thank you,

David C. Lemoine

Compliance Solutions Group

From: John Walker <John.Walker@tceq.texas.gov>
Sent: Tuesday, August 5, 2025 6:01 PM
To: David Lemoine <dlemoine@compliance-sg.com>; Philip Curwick <pcurwick@compliance-sg.com>
Cc: Robert Wiess <Robert.Wiess@natgasoline.com>; Scott Kolb <scott.kolb@natgasoline.com>; Jordan Hollier <jhollier@compliance-sg.com>
Subject: RE: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant

Good Afternoon,

Please provide the requested information below as soon as possible but no later than **08/08/2025:**

1. Alternative Method of Compliance (AMOC) No. 215 was included in the Working Draft Permit as an Alternative Requirement. AMOC 215 authorizes an alternative ammonia (NH_3) monitoring method for compliance with 30 TAC Chapter 117 (NH_3) compliance requirements for Unit IDs B-01001 and B-14001. However, Unit IDs B-01001 and B-14001 are not subject to 30 TAC Chapter 117 as documented in the Working Draft Permit. In fact, these units have permit shields for 30 TAC Chapter

117 in the working draft permit and were provided on Forms OP-UA5 and OP-UA6, respectively, with unit attributes that lead to non-applicability of 30 TAC Chapter 117.

It's not clear to me why AMOC 215 is included as an alternative requirement for these units for 30 TAC Chapter 117 when they are not subject to 30 TAC Chapter 117. It seems the unit attribute data is correct and that based on the age of the site, that 30 TAC Chapter 117 does not apply.

I tried looking for the application for AMOC 215 but I cannot find it in the TCEQ database. Reading the AMOC, it states that it should have been incorporated into NSR 107764 and PSDTX1340 but I see no language regarding the alternative monitoring method in the conditions for NSR 107764/PSDTX1340. I looked through the latest application of NSR 107764 and PSDTX1340 and I see that the language for the alternative monitoring method was requested but I cannot seem to find any emails in the agency review files in regard to why it was not added.

Should AMOC 215 be included in the draft permit? Please let me know if a phone call would be better to discuss this information further.

Thank you for your cooperation.

Sincerely,

John Walker
Team Leader
OA/Air Permits Division/OP Section
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087
John.Walker@tceq.texas.gov
Phone: (512) 239-1277



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

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From: Jordan Hollier <jhollier@compliance-sg.com>
Sent: Monday, July 21, 2025 8:02 AM
To: John Walker John.Walker@tceq.texas.govan
Cc: Robert Wiess <Robert.Wiess@natgasoline.com>; David Lemoine <dlemoine@compliance-sg.com>; Philip Curwick <pcurwick@compliance-sg.com>; Scott Kolb <scott.kolb@natgasoline.com>
Subject: RE: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant

Good morning John,

The update to OP-REQ1 has been completed and submitted on STEERS. I have also attached the submittal here for your convenience.

Thank you,

Jordan Hollier
Compliance Solutions Group
16851 Jefferson Highway, Suite 6D
Baton Rouge, LA 70817
Phone: (225) 754-0405



From: John Walker <John.Walker@tceq.texas.gov>
Sent: Tuesday, July 15, 2025 5:12 PM
To: David Lemoine <dlemoine@compliance-sg.com>; Philip Curwick <pcurwick@compliance-sg.com>
Cc: Miguel Martinez <miguel.martinez@natgasoline.com>; Larry Richard <Larry.Richard@natgasoline.com>; Robert Wiess <Robert.Wiess@natgasoline.com>; David Lemoine <dlemoine@compliance-sg.com>; Jordan Hollier <jhollier@compliance-sg.com>
Subject: RE: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant

Good Afternoon,

The project has gone through QAQC review and a few deficiencies were identified. Please submit the requested information below as soon as possible but no later than **07/18/2025:**

1. On Form OP-REQ1 Page 87, NSR Permit 107764 was provided in Section XII. G. for NSR Authorization with FCAA § 112(g) requirements. Can you confirm that NSR 107764 has FCAA § 112(g) requirements. Should NSR Permit 107764 be documented in Section XII. E. for NSR authorizations instead?

2. Form OP-REQ1 Page 85 Section XII. B. 2 was answered YES indicating the application area includes at least one “State Pollution Control Project” Air Quality Standard Permit NSR authorization under 30 TAC § 116.617 however, Standard Permit Registration 174371 is a non-rule Air Quality Standard Permit for Pollution Control Projects NSR authorization.

   Should Section XII. B. Question 2 be NO and Question XII. B. 3 be YES. Please confirm. I think Question XII. B. 3 should be YES but I am not sure about Question XII. B. 2.

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 these updates have been submitted.

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,
John Walker
Permit Reviewer
OA/Air Permits Division/OP Section
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087
John.Walker@tceq.texas.gov
Phone: (512) 239-1277



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

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From: Jordan Hollier <jhollier@compliance-sg.com>
Sent: Thursday, May 1, 2025 1:33 PM
To: John Walker <John.Walker@tceq.texas.gov>
Cc: Miguel Martinez <miguel.martinez@natgasoline.com>; Larry Richard <Larry.Richard@natgasoline.com>; Robert Wiess <Robert.Wiess@natgasoline.com>; David Lemoine <dlemoine@compliance-sg.com>
Subject: RE: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant

John,
Written response to the working draft permit has been submitted on STEERS. The submittal is also attached to this email.
Thank you,
Jordan Hollier
Compliance Solutions Group
16851 Jefferson Highway, Suite 6D
Baton Rouge, LA 70817

Phone: (225) 754-0405



From: John Walker <John.Walker@tceq.texas.gov>
Sent: Tuesday, April 22, 2025 4:47 PM
To: David Lemoine <dlemoine@compliance-sg.com>
Cc: Miguel Martinez <miguel.martinez@natgasoline.com>; Larry Richard <Larry.Richard@natgasoline.com>; Robert Wiess <Robert.Wiess@natgasoline.com>; David Lemoine <dlemoine@compliance-sg.com>; Jordan Hollier <jhollier@compliance-sg.com>
Subject: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant

Good Afternoon,

I have conducted a technical review of the renewal application for Natgasoline LLC, Methanol Plant. An electronic copy of the Working Draft Permit (WDP) 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.

Please review the WDP and submit to me any comments you have on the working draft permit by **05/06/2025**. Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP. S*ince 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. Any comments outside the scope of the most recent changes should be submitted as a separate project.*

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. Prior to transmittal of the Public Notice/Announcement Authorization Package, 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 this requirement prior to sending the Public Notice/Announcement Authorization.

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 these updates have been submitted.

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,

John Walker
Permit Reviewer
OA/Air Permits Division/OP Section
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087
John.Walker@tceq.texas.gov
Phone: (512) 239-1277



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: John Walker
To: David Lemoine; Philip Curwick
Cc: Robert Wiess; Scott Kolb; Jordan Hollier
Subject: RE: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant
Date: Monday, August 11, 2025 6:56:00 PM

Good evening,

Please submit the following requested information as soon as possible but no later than **08/14/2025:**

1. Please submit Form OP-CRO1 to certify application update(s) and WDP approval. The specific dates of 04/03/2025 and 05/01/2025 should be used and the Submittal Type should be marked: Update to Permit Application.

   The STEERS updates I received on 04/03/2025 and 05/01/2025 were not certified. These STEERS updates were signed and submitted by Mr. Miguel Martinez who was not designated as the Responsible Official (RO) at the time.

   The project is currently with my Section Manager for review of the issuance of the Public Notice Authorization Package (PNAP). Provided no deficiencies are found and I receive the requested Form OP-CRO1 by 08/14/2025, the Public Notice Authorization Package will be issued on 08/15/2025.

If you have any questions, please contact me.

Thank you for your cooperation.

Sincerely,

John Walker
Team Leader
OA/Air Permits Division/OP Section
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087
John.Walker@tceq.texas.gov

Phone: (512) 239-1277

How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

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From: David Lemoine <dlemoine@compliance-sg.com>
Sent: Wednesday, August 6, 2025 7:51 AM
To: John Walker <John.Walker@tceq.texas.gov>; Philip Curwick <pcurwick@compliance-sg.com>
Cc: Robert Wiess <Robert.Wiess@natgasoline.com>; Scott Kolb <scott.kolb@natgasoline.com>; Jordan Hollier <jhollier@compliance-sg.com>
Subject: RE: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant

Good morning John,

The AMOC was submitted as an alternate analyzer method (Tunable Diode Laser Ammonia analyzer) to demonstrate compliance for the Reformer (EPN B-01001) and Auxiliary Boiler (B-14001) which are each equipped with selective catalytic reduction (SCR) to control NOx emissions and resulting in collateral NH3 “slip” emissions.

I agree that the method for monitoring ammonia emissions for demonstrating compliance did not change. We have always utilized the CEMs but the analyzer for measuring ammonia was changed from Chemiluminescence Detection (CLD) extractive technology NOx analyzer to a TDL. The TDL is a direct read ammonia analyzer vs. difference between total NH3/NOx and the unconverted NOx (as measured by the NOx analyzer). This method is referred to as the NOx Differential calculation technique.

Attached for your review is the AMOC approval letter.

Please give us a call if we need to discuss further at 225 754-0405.

Thank you,

David C. Lemoine
Compliance Solutions Group

From: John Walker <John.Walker@tceq.texas.gov>
Sent: Tuesday, August 5, 2025 6:01 PM
To: David Lemoine <dlemoine@compliance-sg.com>; Philip Curwick <pcurwick@compliance-sg.com>

Cc: Robert Wiess <Robert.Wiess@natgasoline.com>; Scott Kolb <scott.kolb@natgasoline.com>; Jordan Hollier <jhollier@compliance-sg.com>
Subject: RE: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant

Good Afternoon,

Please provide the requested information below as soon as possible but no later than **08/08/2025:**

1. Alternative Method of Compliance (AMOC) No. 215 was included in the Working Draft Permit as an Alternative Requirement. AMOC 215 authorizes an alternative ammonia (NH_3) monitoring method for compliance with 30 TAC Chapter 117 (NH_3) compliance requirements for Unit IDs B-01001 and B-14001. However, Unit IDs B-01001 and B-14001 are not subject to 30 TAC Chapter 117 as documented in the Working Draft Permit. In fact, these units have permit shields for 30 TAC Chapter 117 in the working draft permit and were provided on Forms OP-UA5 and OP-UA6, respectively, with unit attributes that lead to non-applicability of 30 TAC Chapter 117.

   It's not clear to me why AMOC 215 is included as an alternative requirement for these units for 30 TAC Chapter 117 when they are not subject to 30 TAC Chapter 117. It seems the unit attribute data is correct and that based on the age of the site, that 30 TAC Chapter 117 does not apply.

   I tried looking for the application for AMOC 215 but I cannot find it in the TCEQ database. Reading the AMOC, it states that it should have been incorporated into NSR 107764 and PSDTX1340 but I see no language regarding the alternative monitoring method in the conditions for NSR 107764/PSDTX1340. I looked through the latest application of NSR 107764 and PSDTX1340 and I see that the language for the alternative monitoring method was requested but I cannot seem to find any emails in the agency review files in regard to why it was not added.

   Should AMOC 215 be included in the draft permit? Please let me know if a phone call would be better to discuss this information further.

Thank you for your cooperation.

Sincerely,

John Walker
Team Leader
OA/Air Permits Division/OP Section
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087
John.Walker@tceq.texas.gov

Phone: (512) 239-1277



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at www.tceq.texas.gov/customersurvey

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natgasoline

July 17, 2025

Sent via STEERS

Mr. John Walker
Permit Reviewer
OA/Air Permits Division/OP Section
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087

RE: Response to QAQC Review from TCEQ via Email on July 15, 2025
Title V Federal Operating Permit No. O3963, Project 36358
Natgasoline LLC; Beaumont Methanol Plant
Beaumont, Jefferson County
RN106586795 and CN604256412

Dear Mr. Walker,

This letter and associated enclosure are being submitted in response to your deficiencies emailed July 15, 2025 regarding the Natgasoline Title V draft permit. See below the responses to the two items from your information request:

1. *On Form OP-REQ1 Page 87, NSR Permit 107764 was provided in Section XII. G. for NSR Authorization with FCAA § 112(g) requirements. Can you confirm that NSR 107764 has FCAA § 112(g) requirements. Should NSR Permit 107764 be documented in Section XII. E. for NSR authorizations instead?*

   Response: NSR Permit 107764 does not have FCAA § 112(g) requirements. This permit reference has been removed from Section XII. G and is now documented in Section XII. 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.

2. *Form OP-REQ1 Page 85 Section XII. B. 2 was answered YES indicating the application area includes at least one "State Pollution Control Project" Air Quality Standard Permit NSR authorization under 30 TAC § 116.617 however, Standard Permit Registration 174371 is a non-rule Air Quality Standard Permit for Pollution Control Projects NSR authorization.*

   Should Section XII. B. Question 2 be NO and Question XII. B. 3 be YES. Please confirm. I think Question XII. B. 3 should be YES but I am not sure about Question XII. B. 2.

   Response: The response to Section XII. B. Question 2 has been updated to NO and the response to Question XII. B. 3 has been updated to YES. Natgasoline only has the non-rule Air Quality Standard Permit for Pollution Control Projects NSR authorization Standard Permit Registration 174371.

2366 Sulphur Plant Rd.
P.O. Box 20339 (77720)
Beaumont, TX 77705
T/ 409 344 4900

If you have any questions concerning this response, please contact me at (409) 344-4900 or by email at robert.wiess@natgasoline.com.

Sincerely,

Robert Wiess
Compliance Manager

Enclosure
OP-REQ1 Pages 85 and 87

cc: w/ encl.

TCEQ Region 10 via email
paul.blanton@tceq.texas.gov

EPA Region 6 via CDX
Compliance and Emissions Data Reporting Interface (CEDRI)

Date:	7/16/2025
Permit No.:	O3963
RN No.:	106586795

For SOP applications, answer ALL questions unless otherwise directed.
♦ *For GOP applications, answer ONLY these questions unless otherwise directed.*

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. RN174371 *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.*	☒YES ☐NO
♦	2.	The application area includes at least one "State Pollution Control Project" Air Quality Standard Permit NSR authorization under 30 TAC § 116.617.	☐YES ☒NO
♦	3.	The application area includes at least one non-rule Air Quality Standard Permit for Pollution Control Projects NSR authorization.	☒YES ☐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.	☐YES ☒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.	☐YES ☒NO
♦	6.	The application area includes at least one "Municipal Solid Waste Landfill" Air Quality Standard Permit NSR authorization under 30 TAC § 116.621.	☐YES ☒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.	☐YES ☒NO
	8.	The application area includes at least one "Concrete Batch Plant" Air Quality Standard Permit NSR authorization.	☐YES ☒NO
♦	9.	The application area includes at least one "Concrete Batch Plant with Enhanced Controls" Air Quality Standard Permit NSR authorization.	☐YES ☒NO
♦	10.	The application area includes at least one "Hot Mix Asphalt Plant" Air Quality Standard Permit NSR authorization.	☐YES ☒NO

Date:	7/16/2025
Permit No.:	O3963
RN No.:	106586795

For SOP applications, answer ALL questions unless otherwise directed.
♦ *For GOP applications, answer ONLY these questions unless otherwise directed.*

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.: PSDTX1340	Issuance Date: 08/09/2024	Pollutant(s): VOC, NOX, CO, PM, PM10
PSD Permit No.: GHGPSDTX54	Issuance Date: 08/09/2024	Pollutant(s): GHG
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.: 174371	Issuance Date: 11/14/2023	Authorization No.:	Issuance Date:
Authorization No.: 107764	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:

Form OP-CRO2
Change of Responsible Official Information
Federal Operating Permit Program

The Texas Commission on Environmental Quality (TCEQ) shall be notified of a new appointment or administrative information change (e.g., address, phone number, title) for a Responsible Official (RO), Designated Representative (DR), or Alternate Designated Representative (ADR) in the next submittal. **Send this completed form to the TCEQ Central Office to the attention of the Air Permits Division.** This form satisfies the requirements for notification (a revised Certificate of Representation must also be submitted to the U.S. Environmental Protection agency for changes in the DR and ADR). *After the initial submittal, if there is a change of Duly Authorized Representative (DAR) appointment or administrative information changes for the DAR, include a revised Form OP-DEL (Delegation of Responsible Official) with the next submittal to the TCEQ.*

I. Identifying Information		
Account No.: JEA035H	RN: 06586795	CN: 604256412
Permit No.: FOP O3963	Area Name: Methanol Plant	
Company Name: Natgasoline LLC		
II. Change Type		
Action Type:	☒ New Appointment	☐ Administrative Information Change
Contact Type *(only one response can be accepted per form)*:		
☒ Responsible Official	☐ Designated Representative	☐ Alternate Designated Representative
III. Responsible Official/Designated Representative/Alternate Designated Representative Information		
Conventional Title: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)		
Name: Robert Wiess		
Title: Compliance Manager	Appointment Effective Date: April 15, 2025	
Telephone No.: (409) 344-4900	Fax No.: N/A	
Company Name: Natgasoline LLC		
Mailing Address: 2366 Sulphur Plant Road		
City: Beaumont	State: TX	ZIP Code: 77705
E-mail Address: robert.wiess@natgasoline.com		
IV. Certification of Truth, Accuracy, and Completeness		

This certification does not extend to information, which is designated by the TCEQ as information for reference only.

I, Robert Wiess, certify that, based on information
(Name printed or typed)

and belief formed after Reasonable inquiry, the statements and information stated above are true, accurate, and complete.

Signature: Robert Wiess Signature Date: 5/15/25

Texas Commission on Environmental Quality

Title V Existing

3963

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	NATGASOLINE METHANOL PLANT
Does the site have a physical address?	No
Because there is no physical address, describe how to locate this site:	2366 Sulphur Plant Road
City	Beaumont
State	TX
ZIP	77705
County	JEFFERSON
Latitude (N) (##.######)	30.012222
Longitude (W) (-###.######)	94.036388
Primary SIC Code	2869
Secondary SIC Code	
Primary NAICS Code	325199
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN106586795
What is the name of the Regulated Entity (RE)?	BEAUMONT GAS TO GASOLINE PLANT
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	2366 SULPHUR PLANT RD
City	BEAUMONT
State	TX
ZIP	77705
County	JEFFERSON
Latitude (N) (##.######)	30.03143
Longitude (W) (-###.######)	-94.05388
Facility NAICS Code	
What is the primary business of this entity?	CHEMICAL MANUFACTURING

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN604256412
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Natgasoline LLC
Texas SOS Filing Number	801689918
Federal Tax ID	680682889
State Franchise Tax ID	32049571162
State Sales Tax ID	

Local Tax ID	
DUNS Number	79934278
Number of Employees	101-250
Independently Owned and Operated?	No

Responsible Official Contact

Person TCEQ should contact for questions about this application:	
Organization Name	Natgasoline LLC
Prefix	MR
First	Robert
Middle	G
Last	Wiess
Suffix	JR
Credentials	
Title	Compliance Manager
Enter new address or copy one from list:	RE Physical Address
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	2366 SULPHUR PLANT RD
Routing (such as Mail Code, Dept., or Attn:)	
City	BEAUMONT
State	TX
ZIP	77705
Phone (###-###-####)	4093443424
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	robert.wiess@natgasoline.com

Technical Contact

Person TCEQ should contact for questions about this application:	
Select existing TC contact or enter a new contact.	New Contact
Organization Name	Compliance Solutions Group
Prefix	MR
First	Philip
Middle	
Last	Curwick
Suffix	
Credentials	
Title	Project Engineer
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	16851 JEFFERSON HWY STE 6D

Routing (such as Mail Code, Dept., or Attn:)	
City	BATON ROUGE
State	LA
ZIP	70817
Phone (###-###-####)	2257540405
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	pcurwick@compliance-sg.com

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	30 Deg 0 Min 44 Sec
3) Permit Longitude Coordinate:	94 Deg 2 Min 11 Sec
4) Is this submittal a new application or an update to an existing application?	Update
4.1. Select the permit/project number for which this update should be applied.	3963-36358
5) 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)

[File Properties]

File Name	OP_REQ1_Form OP-REQ1 Page 85 and 87 (7.16.25).pdf
Hash	021AE410394D5B441A0F0B8D3CA637A10C62FCDD2720B067326E478E5D1DD789
MIME-Type	application/pdf

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)

[File Properties]

File Name	OP_CRO2_05.19.25 Natgasoline OP-CR02.pdf
Hash	B0B5F0914FF58B923C2EC8C6E456F318B8749488B417D84DBBB90042BEDB7300
MIME-Type	application/pdf

Attach OP-DEL (Delegation of Responsible Official)

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name	NatgasTitle V Update Signed Cover Letter 7.16.2025.pdf
Hash	8C813C2FF8CAD4860DF9EBAF54912512E274BDE05F60919B0026ABD7C0FF430B
MIME-Type	application/pdf

An additional space to attach any other necessary information needed to complete the permit.

Certification

I certify that I am the Responsible Official 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 Robert G Wiess JR, the owner of the STEERS account ER113976.
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 enforcemer 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 3963.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEC

OWNER OPERATOR Signature: Robert G Wiess JR OWNER OPERATOR

Account Number:	ER113976
Signature IP Address:	97.77.44.5
Signature Date:	2025-07-21
Signature Hash:	331ED44272C45FC87793895AE009D6A3917FD27E59AE1AAB5DA55AF9D442817E
Form Hash Code at time of Signature:	D408BF96D89EAEC2902F6E2D6C7EF50EFE7357A1C86828D79472A09A7E7FD64C

Submission

Reference Number:	The application reference number is 787470
Submitted by:	The application was submitted by ER113976/Robert G Wiess JR
Submitted Timestamp:	The application was submitted on 2025-07-21 at 07:53:54 CDT
Submitted From:	The application was submitted from IP address 97.77.44.5
Confirmation Number:	The confirmation number is 665650
Steers Version:	The STEERS version is 6.92
Permit Number:	The permit number is 3963

Additional Information

Application Creator: This account was created by Charles M Munley JR

From:	Jordan Hollier <jhollier@compliance-sg.com>
Sent:	Monday, July 21, 2025 8:02 AM
To:	John Walker
Cc:	Robert Wiess; David Lemoine; Philip Curwick; Scott Kolb
Subject:	RE: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant
Attachments:	Form OP-REQ1 Page 85 and 87 (7.16.25).pdf; NatgasTitle V Update Signed Cover Letter 7.16.2025.pdf
Follow Up Flag:	Follow up
Flag Status:	Flagged

Good morning John,

The update to OP-REQ1 has been completed and submitted on STEERS. I have also attached the submittal here for your convenience.

Thank you,

Jordan Hollier
Compliance Solutions Group
16851 Jefferson Highway, Suite 6D
Baton Rouge, LA 70817
Phone: (225) 754-0405



From: Philip Curwick <pcurwick@compliance-sg.com>
Sent: Wednesday, July 16, 2025 5:29 AM
To: John Walker
Cc: robert.wiess@natgasoline.com; nazudeen.mohammed@natgasoline.com; David Lemoine; Jordan Hollier
Subject: RE: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant

Thank you, John. We will address these issues as soon as possible and submit the updated application information through STEERS.

Philip Curwick
Compliance Solutions Group
Baton Rouge, LA
225-754-0405 Office

From: John Walker <John.Walker@tceq.texas.gov>
Sent: Tuesday, July 15, 2025 5:12 PM
To: David Lemoine <dlemoine@compliance-sg.com>; Philip Curwick <pcurwick@compliance-sg.com>
Cc: Miguel Martinez <miguel.martinez@natgasoline.com>; Larry Richard <Larry.Richard@natgasoline.com>; Robert Wiess <Robert.Wiess@natgasoline.com>; David Lemoine <dlemoine@compliance-sg.com>; Jordan Hollier <jhollier@compliance-sg.com>
Subject: RE: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant

Good Afternoon,

The project has gone through QAQC review and a few deficiencies were identified. Please submit the requested information below as soon as possible but no later than **07/18/2025:**

1. On Form OP-REQ1 Page 87, NSR Permit 107764 was provided in Section XII. G. for NSR Authorization with FCAA § 112(g) requirements. Can you confirm that NSR 107764 has FCAA § 112(g) requirements. Should NSR Permit 107764 be documented in Section XII. E. for NSR authorizations instead?

2. Form OP-REQ1 Page 85 Section XII. B. 2 was answered YES indicating the application area includes at least one “State Pollution Control Project” Air Quality Standard Permit NSR authorization under 30 TAC § 116.617 however, Standard Permit Registration 174371 is a non-rule Air Quality Standard Permit for Pollution Control Projects NSR authorization.

   Should Section XII. B. Question 2 be NO and Question XII. B. 3 be YES. Please confirm. I think Question XII. B. 3 should be YES but I am not sure about Question XII. B. 2.

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 these updates have been submitted.

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,

John Walker
Permit Reviewer
OA/Air Permits Division/OP Section
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087
John.Walker@tceq.texas.gov

Phone: (512) 239-1277



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Philip Curwick <pcurwick@compliance-sg.com>
Sent: Tuesday, June 24, 2025 7:51 AM
To: John Walker
Subject: RE: Title V Renewal Permit Status - FOP O3963/Project 36358 Natgasoline LLC, Methanol Plant

Thank you, John.

We are looking forward to getting this finalized.

Philip Curwick
Compliance Solutions Group

From: John Walker <John.Walker@tceq.texas.gov>
Sent: Monday, June 23, 2025 4:51 PM
To: Philip Curwick <pcurwick@compliance-sg.com>
Subject: RE: Title V Renewal Permit Status - FOP O3963/Project 36358 Natgasoline LLC, Methanol Plant

Good Afternoon,

APIRT updated the RO information from Form OP-CRO2 today. I am planning to submit this project to internal QA/QC review tomorrow. If no deficiencies are found in QA/QC review, the project will then go to team leader review for issuance of the Public Notice Authorization Package.

If you have any other questions, please let me know.

Sincerely,

John Walker
Permit Reviewer
OA/Air Permits Division/OP Section
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087
John.Walker@tceq.texas.gov

Phone: (512) 239-1277



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

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From: Philip Curwick <pcurwick@compliance-sg.com>
Sent: Tuesday, June 17, 2025 10:21 AM
To: John Walker <John.Walker@tceq.texas.gov>
Subject: FW: Title V Renewal Permit Status - FOP O3963/Project 36358 Natgasoline LLC, Methanol Plant

John,

Has everything been clicked over in terms of the OP-CR02 in regard to the Title V permitting process? Also, can you update us in terms of the progress of the final Draft on the Title V?

Thanks,

Philip Curwick
Compliance Solutions Group

From: Philip Curwick <pcurwick@compliance-sg.com>
Sent: Tuesday, May 27, 2025 11:13 AM
To: John Walker
Subject: RE: Title V Renewal Permit Status - FOP O3963/Project 36358 Natgasoline LLC, Methanol Plant

John,

Thanks for the information. The revised/updated OP-CRO2 was uploaded into the Title V App under STEERS. I will get it certified so it will click over.

Thanks,

Phil

From: John Walker <John.Walker@tceq.texas.gov>
Sent: Tuesday, May 27, 2025 10:08 AM
To: Philip Curwick <pcurwick@compliance-sg.com>
Subject: RE: Title V Renewal Permit Status - FOP O3963/Project 36358 Natgasoline LLC, Methanol Plant

Good Morning Philip,

I am waiting for APIRT to process the OP-CRO2 submitted to me on 05/19/2025. Your 05/19/2025 email states the OP-CRO2 was submitted in STEERS but I do not see it. Can you please confirm that the OP-CRO2 was submitted in STEERS.

The permit/application still needs to go through internal QA/QC review and Team Leader review before the Public Notice Authorization Package (PNAP) can be issued. Once this OP-CRO2 is processed, I will be able to submit the project for review.

Please let me know if you have any additional questions.

Sincerely,

John Walker
Permit Reviewer
OA/Air Permits Division/OP Section
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087
John.Walker@tceq.texas.gov

Phone: (512) 239-1277



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Philip Curwick <pcurwick@compliance-sg.com>
Sent: Tuesday, May 27, 2025 9:55 AM
To: John Walker <John.Walker@tceq.texas.gov>
Subject: Title V Renewal Permit Status - FOP O3963/Project 36358 Natgasoline LLC, Methanol Plant

John,

Can you give us an update on the status of finalizing the Draft Title V Air Permit for Natgasoline in Beaumont Texas.

Thank You,

Philip Curwick
Compliance Solutions Group

From: Philip Curwick <pcurwick@compliance-sg.com>
Sent: Monday, May 19, 2025 1:08 PM
To: John Walker
Cc: robert.wiess@natgasoline.com; David Lemoine; scott.kolb@natgasoline.com
Subject: Updated OP-CRO2 Form - Natgasoline Beaumont Methanol Plant
Attachments: 05.19.25 Natgasoline OP-CR02.pdf

Follow Up Flag: Follow up
Flag Status: Completed

John,

Please find attached the updated OP-CRO2 Form for the Natgasoline Beaumont Methanol Plant. A copy of the form has also been submitted through STEERS and CDX-CEDRI for those records.

Additionally, please note that Robert Wiess should now be designated as the Responsible Official for this matter. Kindly direct any correspondence regarding the pending Title V permit renewal to him.

Let me know if you need any further information.

Best regards,

Philip Curwick
Compliance Solutions Group
Baton Rouge, LA

225-754-0405 (Office)
225-620-3075 (Cell)

Form OP-CRO2
Change of Responsible Official Information
Federal Operating Permit Program

The Texas Commission on Environmental Quality (TCEQ) shall be notified of a new appointment or administrative information change (e.g., address, phone number, title) for a Responsible Official (RO), Designated Representative (DR), or Alternate Designated Representative (ADR) in the next submittal. **Send this completed form to the TCEQ Central Office to the attention of the Air Permits Division.** This form satisfies the requirements for notification (a revised Certificate of Representation must also be submitted to the U.S. Environmental Protection agency for changes in the DR and ADR). *After the initial submittal, if there is a change of Duly Authorized Representative (DAR) appointment or administrative information changes for the DAR, include a revised Form OP-DEL (Delegation of Responsible Official) with the next submittal to the TCEQ.*

I. Identifying Information		
Account No.: JEA035H	RN: 06586795	CN: 604256412
Permit No.: FOP O3963	Area Name: Methanol Plant	
Company Name: Natgasoline LLC		
II. Change Type		
Action Type:	☒ New Appointment	☐ Administrative Information Change
Contact Type *(only one response can be accepted per form)*:		
☒ Responsible Official	☐ Designated Representative	☐ Alternate Designated Representative
III. Responsible Official/Designated Representative/Alternate Designated Representative Information		
Conventional Title: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)		
Name: Robert Wiess		
Title: Compliance Manager	Appointment Effective Date: April 15, 2025	
Telephone No.: (409) 344-4900	Fax No.: N/A	
Company Name: Natgasoline LLC		
Mailing Address: 2366 Sulphur Plant Road		
City: Beaumont	State: TX	ZIP Code: 77705
E-mail Address: robert.wiess@natgasoline.com		
IV. Certification of Truth, Accuracy, and Completeness		

This certification does not extend to information, which is designated by the TCEQ as information for reference only.

I, Robert Wiess, certify that, based on information
(Name printed or typed)

and belief formed after Reasonable inquiry, the statements and information stated above are true, accurate, and complete.

Signature: Robert Wiess Signature Date: 5/15/25

natgasoline

May 1, 2025

Sent via STEERS

Mr. John Walker
Permit Reviewer
OA/Air Permits Division/OP Section
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087

RE: Response to Working Draft Permit Received from TCEQ via Email on April 22, 2025
Title V Federal Operating Permit No. O3963, Project 36358
Natgasoline LLC; Beaumont Methanol Plant
Beaumont, Jefferson County
RN106586795 and CN604256412

Dear Mr. Walker:

This letter is being submitted in response to the Working Draft Permit (FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant) received via email on April 22, 2025. Based on our review, Natgasoline has no further comments regarding the Title V working draft permit.

If you have any questions concerning this response, please contact me at (409) 344-4974 or by email at miguel.martinez@natgasoline.com.

Sincerely,

Natgasoline LLC

Miguel A. Martinez
Environmental Manager

Texas Commission on Environmental Quality

Title V Existing

3963

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	NATGASOLINE METHANOL PLANT
Does the site have a physical address?	No
Because there is no physical address, describe how to locate this site:	2366 Sulphur Plant Road
City	Beaumont
State	TX
ZIP	77705
County	JEFFERSON
Latitude (N) (##.######)	30.012222
Longitude (W) (-###.######)	94.036388
Primary SIC Code	2869
Secondary SIC Code	
Primary NAICS Code	325199
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN106586795
What is the name of the Regulated Entity (RE)?	BEAUMONT GAS TO GASOLINE PLANT
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	2366 SULPHUR PLANT RD
City	BEAUMONT
State	TX
ZIP	77705
County	JEFFERSON
Latitude (N) (##.######)	30.03143
Longitude (W) (-###.######)	-94.05388
Facility NAICS Code	
What is the primary business of this entity?	CHEMICAL MANUFACTURING

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN604256412
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Natgasoline LLC
Texas SOS Filing Number	801689918
Federal Tax ID	680682889
State Franchise Tax ID	32049571162
State Sales Tax ID	

Local Tax ID	
DUNS Number	79934278
Number of Employees	101-250
Independently Owned and Operated?	No

Responsible Official Contact

Person TCEQ should contact for questions about this application:	
Organization Name	NATGASOLINE LLC
Prefix	MR
First	LARRY
Middle	
Last	RICHARD
Suffix	
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)	PO BOX 20339
Routing (such as Mail Code, Dept., or Attn:)	
City	BEAUMONT
State	TX
ZIP	77720
Phone (###-###-####)	4093444900
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	larry.richard@natgasoline.com

Technical Contact

Person TCEQ should contact for questions about this application:	
Select existing TC contact or enter a new contact.	MIGUEL MARTINEZ(NATGASOLINE LLC...)
Organization Name	NATGASOLINE LLC
Prefix	MR
First	MIGUEL
Middle	
Last	MARTINEZ
Suffix	
Credentials	
Title	ENVIRONMENTAL MANAGER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 20339

Routing (such as Mail Code, Dept., or Attn:)	
City	BEAUMONT
State	TX
ZIP	77720
Phone (###-###-####)	4093444974
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	miguel.martinez@natgasoline.com

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	30 Deg 0 Min 44 Sec
3) Permit Longitude Coordinate:	94 Deg 2 Min 11 Sec
4) Is this submittal a new application or an update to an existing application?	Update
4.1. Select the permit/project number for which this update should be applied.	3963-36358
5) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	N/A

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 Void Request Form

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name	Title V Response Signed.pdf
Hash	B29D124C0465937ED8A140170589DFC6C62145267C9A3E3EE4CF2CB0247F531C
MIME-Type	application/pdf

An additional space to attach any other necessary information needed to complete the permit.

Certification

I certify that I am the Responsible Official 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 Miguel A Martinez, the owner of the STEERS account ER084792.
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 enforcemer 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 3963.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEC

OWNER OPERATOR Signature: Miguel A Martinez OWNER OPERATOR

Account Number:	ER084792
Signature IP Address:	97.77.44.5
Signature Date:	2025-05-01
Signature Hash:	7A6FD67D2392DC16A265E96D0827A2D5A4E245F7C5D3DBD3BAF34BB25CC8C68D
Form Hash Code at time of Signature:	B94F7EC3F6F1209834C87358FB7F13230B3CC4AD41FB128557676C6813988FC2

Submission

Reference Number:	The application reference number is 783126
Submitted by:	The application was submitted by ER084792/Miguel A Martinez
Submitted Timestamp:	The application was submitted on 2025-05-01 at 13:18:11 CDT
Submitted From:	The application was submitted from IP address 97.77.44.5
Confirmation Number:	The confirmation number is 650417
Steers Version:	The STEERS version is 6.90
Permit Number:	The permit number is 3963

Additional Information

Application Creator: This account was created by Charles M Munley JR

From: Jordan Hollier <jhollier@compliance-sg.com>
Sent: Thursday, May 1, 2025 1:33 PM
To: John Walker
Cc: Miguel Martinez; Larry Richard; Robert Wiess; David Lemoine
Subject: RE: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant
Attachments: Title V Response Signed.pdf

Follow Up Flag: Follow up
Flag Status: Completed

John,

Written response to the working draft permit has been submitted on STEERS. The submittal is also attached to this email.

Thank you,

Jordan Hollier
Compliance Solutions Group
16851 Jefferson Highway, Suite 6D
Baton Rouge, LA 70817
Phone: (225) 754-0405



natgasoline

May 1, 2025

Sent via STEERS

Mr. John Walker
Permit Reviewer
OA/Air Permits Division/OP Section
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087

RE: Response to Working Draft Permit Received from TCEQ via Email on April 22, 2025
Title V Federal Operating Permit No. O3963, Project 36358
Natgasoline LLC; Beaumont Methanol Plant
Beaumont, Jefferson County
RN106586795 and CN604256412

Dear Mr. Walker:

This letter is being submitted in response to the Working Draft Permit (FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant) received via email on April 22, 2025. Based on our review, Natgasoline has no further comments regarding the Title V working draft permit.

If you have any questions concerning this response, please contact me at (409) 344-4974 or by email at miguel.martinez@natgasoline.com.

Sincerely,

Natgasoline LLC

Miguel A. Martinez
Environmental Manager

From: David Lemoine <dlemoine@compliance-sg.com>
Sent: Thursday, April 24, 2025 7:17 AM
To: John Walker
Cc: Miguel Martinez; Larry Richard; Robert Wiess; Jordan Hollier
Subject: RE: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant

John,

Thank you for working through draft permit. We will provide comments as appropriate.

Thanks again,
David

From: John Walker <John.Walker@tceq.texas.gov>
Sent: Tuesday, April 22, 2025 4:47 PM
To: David Lemoine <dlemoine@compliance-sg.com>
Cc: Miguel Martinez <miguel.martinez@natgasoline.com>; Larry Richard <Larry.Richard@natgasoline.com>; Robert Wiess <Robert.Wiess@natgasoline.com>; David Lemoine <dlemoine@compliance-sg.com>; Jordan Hollier <jhollier@compliance-sg.com>
Subject: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant

Good Afternoon,

I have conducted a technical review of the renewal application for Natgasoline LLC, Methanol Plant. An electronic copy of the Working Draft Permit (WDP) 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.

Please review the WDP and submit to me any comments you have on the working draft permit by **05/06/2025**. Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP. S*ince 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. Any comments outside the scope of the most recent changes should be submitted as a separate project.*

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. Prior

to transmittal of the Public Notice/Announcement Authorization Package, 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 this requirement prior to sending the Public Notice/Announcement Authorization.

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 these updates have been submitted.

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,

John Walker
Permit Reviewer
OA/Air Permits Division/OP Section
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087
John.Walker@tceq.texas.gov

Phone: (512) 239-1277



How are we doing? Fill out our online customer satisfaction survey
at www.tceq.texas.gov/customersurvey

From: David Lemoine <dlemoine@compliance-sg.com>
Sent: Tuesday, April 22, 2025 8:54 AM
To: John Walker
Subject: RE: NatGas Title V updated forms uploaded to STEERS- Permit No. O3963, Project 36358

John,

Thanks for the update and we look forward to the second draft permit review.

David

From: John Walker <John.Walker@tceq.texas.gov>
Sent: Tuesday, April 22, 2025 8:36 AM
To: David Lemoine <dlemoine@compliance-sg.com>
Subject: RE: NatGas Title V updated forms uploaded to STEERS- Permit No. O3963, Project 36358

Good Morning David,

I am working on a response right now. You should receive it before noon.

Sincerely,

John Walker (x1277)
Permit Reviewer – Title V

From: David Lemoine <dlemoine@compliance-sg.com>
Sent: Monday, April 21, 2025 10:48 AM
To: John Walker <John.Walker@tceq.texas.gov>
Subject: NatGas Title V updated forms uploaded to STEERS- Permit No. O3963, Project 36358

John,

Just wanted to make my weekly check/status on the Natgasoline Title V draft permit?

I hope you guys had a good Easter!

Thank you,

David C. Lemoine
Compliance Solutions Group

From: Jordan Hollier <jhollier@compliance-sg.com>
Sent: Friday, April 4, 2025 7:44 AM
To: John Walker
Cc: Miguel Martinez; Larry Richard; Robert Wiess; David Lemoine
Subject: RE: NatGas Title V updated forms uploaded to STEERS- Permit No. O3963, Project 36358
Attachments: Signed Cover Letter Plus Major NSR Summary Table_GHGPSDTX54 (4_2_2025).pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Good Morning John,

Our response to your information request has been submitted on STEERS. Out of courtesy, the submittal is also attached to this email.

Please let me know if you have any questions.

Thank you,

Jordan Hollier
Compliance Solutions Group
16851 Jefferson Highway, Suite 6D
Baton Rouge, LA 70817
Phone: (225) 754-0405



natgasoline

April 2, 2025

Sent via STEERS

Mr. John Walker
Permit Reviewer
OA/Air Permits Division/OP Section
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087

RE: Response to Information Request Received from TCEQ via Email on March 31, 2025
Title V Federal Operating Permit No. O3963, Project 36358
Natgasoline LLC; Beaumont Methanol Plant
Beaumont, Jefferson County
RN106586795 and CN604256412

Dear Mr. Walker,

This letter and associated enclosure are being submitted in response to your questions emailed March 31, 2025 regarding the Natgasoline Title V draft permit. See below the responses to the two items from your information request:

1. *The Major NSR Summary Tables for NSR 107764/PSDTX1340 and GHGPSDTX54 were in the Working Draft Permit (WDP) sent on 02/07/2025. The NSR 107764/PSDTX1340 Major NSR Summary Table reflects changes provided on 10/24/2024. However, a Major NSR Summary Table was not provided for GHGPSDTX54. I created a new one based on the 08/09/2024 issuance. Please review it and add the necessary information to the Monitoring and Testing, Recordkeeping, and Reporting Columns.*

   I have attached a copy of the Major NSR Summary Table for GHGPSDTX54 that upon completion I will put into the WDP.

   Response: Please find the attached Major NSR Summary Table for GHGPSDTX54. The necessary information for the Monitoring and Testing, Recordkeeping, and Reporting columns has been provided.

2. *The Form OP-PBRSUP and Form OP-REQ1 Page 88 submitted on 01/16/2024 seem to be missing information from previous submittals. Please provide an updated Form OP-PBRSUP and Form OP-REQ1 Page 88 for PBR Information. This is important as Permit Term 15 references the submittal date of Form OP-PBRSUP, so all information should be included in the submittal referenced in the permit term. I will update the submittal date referenced in the permit term when I received the updated Forms.*

2366 Sulphur Plant Rd.
P.O. Box 20339 (77720)
Beaumont, TX 77705
T/ 409 344 4900

Please review the PBR Information in the WDP and ensure that Form OP-REQ1 Page 88, Form OP-PBRSUP, and the New Source Review Authorization References and New Source Review Authorization References by Emissions Unit Tables in the WDP have consistent information.

There may be units on Form OP-PBRSUP that are not documented in the Title V permit (due to having no Title V requirements) however, any unit authorized by a PBR or any PBR in the New Source Review Authorization References table in the Title V permit, in most cases, should be documented on Form OP-PBRSUP and OP-REQ1 Page 88.

Response: The Form OP-PBRSUP and Form OP-REQ1 Page 88 submitted on 01/16/2025 comprise all PBRs for the facility. The working draft permit pages 52 and 53 include PBRs that are no longer applicable to the facility. The following PBRs should be removed from Draft Page 52:

- 106.227 Soldering, Brazing, Welding
- 106.263 Routine Maintenance, Startup and Shutdown of Facilities, and Temporary Maintenance Facilities
- 106.265 Hand-held and Manually Operated Machines
- 106.371 Cooling-Water Units
- 106.452 Dry Abrasive Cleaning

From the New Source Review Authorization References by Emission Unit Table on Draft Permit Page 53, Units F-07502, F-07503, F-07504, and F-07505 under PBR 106.472 should be removed. These units have been deleted using forms OP-2 and OP-SUMR submitted on February 14, 2025.

If you have any questions concerning this response, please contact me at (409) 344-4974 or by email at miguel.martinez@natgasoline.com.

Sincerely,

Natgasoline LLC

Miguel A. Martinez
Environmental Manager

Enclosure
Major NSR Summary Table for GHGPSDTX54

Major NSR Summary Table

Permit Number: GHGPSDTX54					Issuance Date: 8/9/2024		
Emission Point No.	Source Name	Air Contaminant Name	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hr	TPY (2,3)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
B-01001	Reformer	CO_2		718,860	III.A.1 III.B IV.A V	III.A.1 III.B	IV.A V VI
		CH_4		12.94			
		N_2O		1.29			
		CO_2e		718, 874			
B-14001	Auxiliary Boiler	CO_2		357,225	III.A.2 IV.A V	III.A.2	IV.A V VI
		CH_4		6.74			
		N_2O		0.67			
		CO_2e		357,534			
S-10001	Flare Pilot & Normal Operation	CO_2		22,688.88	III.A.3 IV.A	III.A.3 IV.A	IV.A VI
		CH_4		38.22			
		N_2O		0.04			
		CO_2e		23,655.77			
S-10001 (MSS)	Flare MSS Vents	CO_2		36.788.81	III.A.4 IV.A	III.A.4 III.A.3 IV.A	IV.A VI
		CH_4		30.39			
		N_2O		0.06			

Major NSR Summary Table

Permit Number: GHGPSDTX54					Issuance Date: 8/9/2024		
Emission Point No.	**Source Name**	**Air Contaminant Name**	**Emission Rates**		**Monitoring and Testing Requirements**	**Recordkeeping Requirements**	**Reporting Requirements**
			lbs/hr	**TPY (2,3)**	**Special Condition/Application Information**	**Special Condition/Application Information**	**Special Condition/Application Information**
		CO_2e		37,656.27			
FUG-MEOH	MeOH Fugitives	CH_4	No Numerical limit is established (4)		III.A.5	III.A.5	IV.A VI
H-EMG	Emergency Generator	CO_2		139	III.A.6 IV.A	III.A.6 IV.A	IV.A VI
		CH_4		0.01			
		N_2O		<0.01			
		CO_2e		140			
H-FWP1 H-FWP2	Firewater Pump Engines	CO_2		139	III.A.6 IV.A	III.A.6 IV.A	IV.A VI
		CH_4		0.01			
		N_2O		<0.01			
		CO_2e		140			
T-06001	Cooling Tower	CO_2		-	III.A.7 IV.A	III.A.7 IV.A	
		CH_4		34.65			
		N_2O		-			
		CO_2e		866			
Totals (5)		CO_2		1,136,281.69			

Major NSR Summary Table

Permit Number: GHGPSDTX54					Issuance Date: 8/9/2024		
Emission Point No.	Source Name	Air Contaminant Name	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hr	TPY (2,3)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		CH_4		122.97			
		N_2O		2.09			
		CO_2e		1,139,006.04			

1. Compliance with the annual emission limits (TPY) is based on a 12-month rolling basis.
2. The TPY emission limits specified in this table are not to be exceeded for this facility and include emissions from the facility during all operations, including MSS activities.
3. Global Warming Potentials (GWP): Methane (CH_4) = 25, Nitrous Oxide (N_2O) = 298
4. Fugitive process emissions from EPN FUG-MEOH are estimated to be 10.91 TPY of CH_4 and 273 TPY CO_2e. In lieu of an emission limit, the emissions will be limited by implementing an LDAR monitoring program.
5. The total emissions for CH_4 and Carbon dioxide equivalent (CO_2e) include the Potential to Emit (PTE) for process fugitive emissions of CH_4. These totals are given for informational purposes only and do not constitute emission limits.

natgasoline

April 2, 2025

Sent via STEERS

Mr. John Walker
Permit Reviewer
OA/Air Permits Division/OP Section
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087

RE: Response to Information Request Received from TCEQ via Email on March 31, 2025
Title V Federal Operating Permit No. O3963, Project 36358
Natgasoline LLC; Beaumont Methanol Plant
Beaumont, Jefferson County
RN106586795 and CN604256412

Dear Mr. Walker,

This letter and associated enclosure are being submitted in response to your questions emailed March 31, 2025 regarding the Natgasoline Title V draft permit. See below the responses to the two items from your information request:

1. *The Major NSR Summary Tables for NSR 107764/PSDTX1340 and GHGPSDTX54 were in the Working Draft Permit (WDP) sent on 02/07/2025. The NSR 107764/PSDTX1340 Major NSR Summary Table reflects changes provided on 10/24/2024. However, a Major NSR Summary Table was not provided for GHGPSDTX54. I created a new one based on the 08/09/2024 issuance. Please review it and add the necessary information to the Monitoring and Testing, Recordkeeping, and Reporting Columns.*

   I have attached a copy of the Major NSR Summary Table for GHGPSDTX54 that upon completion I will put into the WDP.

   Response: Please find the attached Major NSR Summary Table for GHGPSDTX54. The necessary information for the Monitoring and Testing, Recordkeeping, and Reporting columns has been provided.

2. *The Form OP-PBRSUP and Form OP-REQ1 Page 88 submitted on 01/16/2024 seem to be missing information from previous submittals. Please provide an updated Form OP-PBRSUP and Form OP-REQ1 Page 88 for PBR Information. This is important as Permit Term 15 references the submittal date of Form OP-PBRSUP, so all information should be included in the submittal referenced in the permit term. I will update the submittal date referenced in the permit term when I received the updated Forms.*

2366 Sulphur Plant Rd.
P.O. Box 20339 (77720)
Beaumont, TX 77705
T/ 409 344 4900

Please review the PBR Information in the WDP and ensure that Form OP-REQ1 Page 88, Form OP-PBRSUP, and the New Source Review Authorization References and New Source Review Authorization References by Emissions Unit Tables in the WDP have consistent information.

There may be units on Form OP-PBRSUP that are not documented in the Title V permit (due to having no Title V requirements) however, any unit authorized by a PBR or any PBR in the New Source Review Authorization References table in the Title V permit, in most cases, should be documented on Form OP-PBRSUP and OP-REQ1 Page 88.

Response: The Form OP-PBRSUP and Form OP-REQ1 Page 88 submitted on 01/16/2025 comprise all PBRs for the facility. The working draft permit pages 52 and 53 include PBRs that are no longer applicable to the facility. The following PBRs should be removed from Draft Page 52:

- 106.227 Soldering, Brazing, Welding
- 106.263 Routine Maintenance, Startup and Shutdown of Facilities, and Temporary Maintenance Facilities
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From the New Source Review Authorization References by Emission Unit Table on Draft Permit Page 53, Units F-07502, F-07503, F-07504, and F-07505 under PBR 106.472 should be removed. These units have been deleted using forms OP-2 and OP-SUMR submitted on February 14, 2025.

If you have any questions concerning this response, please contact me at (409) 344-4974 or by email at miguel.martinez@natgasoline.com.

Sincerely,

Natgasoline LLC

Miguel A. Martinez
Environmental Manager

Enclosure
Major NSR Summary Table for GHGPSDTX54

Major NSR Summary Table

Permit Number: GHGPSDTX54					Issuance Date: 8/9/2024		
Emission Point No.	**Source Name**	**Air Contaminant Name**	**Emission Rates**		**Monitoring and Testing Requirements**	**Recordkeeping Requirements**	**Reporting Requirements**
			lbs/hr	**TPY (2,3)**	**Special Condition/Application Information**	**Special Condition/Application Information**	**Special Condition/Application Information**
B-01001	Reformer	CO_2		718,860	III.A.1 III.B IV.A V	III.A.1 III.B	IV.A V VI
		CH_4		12.94			
		N_2O		1.29			
		CO_2e		718, 874			
B-14001	Auxiliary Boiler	CO_2		357,225	III.A.2 IV.A V	III.A.2	IV.A V VI
		CH_4		6.74			
		N_2O		0.67			
		CO_2e		357,534			
S-10001	Flare Pilot & Normal Operation	CO_2		22,688.88	III.A.3 IV.A	III.A.3 IV.A	IV.A VI
		CH_4		38.22			
		N_2O		0.04			
		CO_2e		23,655.77			
S-10001 (MSS)	Flare MSS Vents	CO_2		36.788.81	III.A.4 IV.A	III.A.4 III.A.3 IV.A	IV.A VI
		CH_4		30.39			
		N_2O		0.06			

Major NSR Summary Table

Permit Number: GHGPSDTX54					Issuance Date: 8/9/2024		
Emission Point No.	**Source Name**	**Air Contaminant Name**	**Emission Rates**		**Monitoring and Testing Requirements**	**Recordkeeping Requirements**	**Reporting Requirements**
			lbs/hr	**TPY (2,3)**	**Special Condition/Application Information**	**Special Condition/Application Information**	**Special Condition/Application Information**
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FUG-MEOH	MeOH Fugitives	CH_4	No Numerical limit is established (4)		III.A.5	III.A.5	IV.A VI
H-EMG	Emergency Generator	CO_2		139	III.A.6 IV.A	III.A.6 IV.A	IV.A VI
		CH_4		0.01			
		N_2O		<0.01			
		CO_2e		140			
H-FWP1 H-FWP2	Firewater Pump Engines	CO_2		139	III.A.6 IV.A	III.A.6 IV.A	IV.A VI
		CH_4		0.01			
		N_2O		<0.01			
		CO_2e		140			
T-06001	Cooling Tower	CO_2		-	III.A.7 IV.A	III.A.7 IV.A	
		CH_4		34.65			
		N_2O		-			
		CO_2e		866			
Totals (5)		CO_2		1,136,281.69			

Major NSR Summary Table

Permit Number: GHGPSDTX54					Issuance Date: 8/9/2024		
Emission Point No.	Source Name	Air Contaminant Name	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hr	TPY (2,3)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		CH_4		122.97			
		N_2O		2.09			
		CO_2e		1,139,006.04			

1. Compliance with the annual emission limits (TPY) is based on a 12-month rolling basis.
2. The TPY emission limits specified in this table are not to be exceeded for this facility and include emissions from the facility during all operations, including MSS activities.
3. Global Warming Potentials (GWP): Methane (CH_4) = 25, Nitrous Oxide (N_2O) = 298
4. Fugitive process emissions from EPN FUG-MEOH are estimated to be 10.91 TPY of CH_4 and 273 TPY CO_2e. In lieu of an emission limit, the emissions will be limited by implementing an LDAR monitoring program.
5. The total emissions for CH_4 and Carbon dioxide equivalent (CO_2e) include the Potential to Emit (PTE) for process fugitive emissions of CH_4. These totals are given for informational purposes only and do not constitute emission limits.

Texas Commission on Environmental Quality

Title V Existing

3963

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	NATGASOLINE METHANOL PLANT
Does the site have a physical address?	No
Because there is no physical address, describe how to locate this site:	2366 Sulphur Plant Road
City	Beaumont
State	TX
ZIP	77705
County	JEFFERSON
Latitude (N) (##.######)	30.012222
Longitude (W) (-###.######)	94.036388
Primary SIC Code	2869
Secondary SIC Code	
Primary NAICS Code	325199
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN106586795
What is the name of the Regulated Entity (RE)?	BEAUMONT GAS TO GASOLINE PLANT
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	2366 SULPHUR PLANT RD
City	BEAUMONT
State	TX
ZIP	77705
County	JEFFERSON
Latitude (N) (##.######)	30.03143
Longitude (W) (-###.######)	-94.05388
Facility NAICS Code	
What is the primary business of this entity?	CHEMICAL MANUFACTURING

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN604256412
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Natgasoline LLC
Texas SOS Filing Number	801689918
Federal Tax ID	680682889
State Franchise Tax ID	32049571162
State Sales Tax ID	

Local Tax ID	
DUNS Number	79934278
Number of Employees	101-250
Independently Owned and Operated?	No
I certify that the full legal name of the entity applying for this permit has been provided and is legally authorized to do business in Texas.	Yes

Responsible Official Contact

Person TCEQ should contact for questions about this application:	
Organization Name	NATGASOLINE LLC
Prefix	MR
First	LARRY
Middle	
Last	RICHARD
Suffix	
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)	PO BOX 20339
Routing (such as Mail Code, Dept., or Attn:)	
City	BEAUMONT
State	TX
ZIP	77720
Phone (###-###-####)	4093444900
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	larry.richard@natgasoline.com

Technical Contact

Person TCEQ should contact for questions about this application:	
Select existing TC contact or enter a new contact.	MIGUEL MARTINEZ(NATGASOLINE LLC...)
Organization Name	NATGASOLINE LLC
Prefix	MR
First	MIGUEL
Middle	
Last	MARTINEZ
Suffix	
Credentials	
Title	ENVIRONMENTAL MANAGER
Enter new address or copy one from list:	
Mailing Address	

Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 20339
Routing (such as Mail Code, Dept., or Attn:)	
City	BEAUMONT
State	TX
ZIP	77720
Phone (###-###-####)	4093444974
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	miguel.martinez@natgasoline.com

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	30 Deg 0 Min 44 Sec
3) Permit Longitude Coordinate:	94 Deg 2 Min 11 Sec
4) Is this submittal a new application or an update to an existing application?	Update
4.1. Select the permit/project number for which this update should be applied.	3963-36358
5) 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 Void Request Form

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name	Signed Cover Letter Plus Major NSR Summary Table_GHGPSDTX54 (4_2_2025).pdf
Hash	1CB54C16581FF13B32B95C3030EFA9C032DBA235264D85096D40ED02C87FBC0E
MIME-Type	application/pdf

An additional space to attach any other necessary information needed to complete the permit.

Certification

I certify that I am the Responsible Official 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 Miguel A Martinez, the owner of the STEERS account ER084792.
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 enforcemer 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 3963.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEC

OWNER OPERATOR Signature: Miguel A Martinez OWNER OPERATOR

Account Number:	ER084792
Signature IP Address:	97.77.44.5
Signature Date:	2025-04-03
Signature Hash:	7A6FD67D2392DC16A265E96D0827A2D5A4E245F7C5D3DBD3BAF34BB25CC8C68D
Form Hash Code at time of Signature:	4E5B75ACC92C83FCA39E02607BEE33307D7DA1BFD626071202E3D848271EDC08

Submission

Reference Number:	The application reference number is 775389
Submitted by:	The application was submitted by ER084792/Miguel A Martinez
Submitted Timestamp:	The application was submitted on 2025-04-03 at 08:48:24 CDT
Submitted From:	The application was submitted from IP address 97.77.44.5

Confirmation Number:	The confirmation number is 643862
Steers Version:	The STEERS version is 6.89
Permit Number:	The permit number is 3963

Additional Information

Application Creator: This account was created by Charles M Munley JR

From: Jordan Hollier <jhollier@compliance-sg.com>
Sent: Monday, March 31, 2025 11:23 AM
To: John Walker
Cc: David Lemoine; Marty Munley
Subject: RE: NatGas Title V updated forms uploaded to STEERS- Permit No. O3963, Project 36358

Follow Up Flag: Follow up
Flag Status: Completed

John,

Please give us a call at our office to discuss this information request. We need more clarification on what you are looking for regarding the PBR information in the second item.

Please reach us at (225) 754-0405.

Thank you,

Jordan Hollier

From: David Lemoine <dlemoine@compliance-sg.com>
Sent: Monday, March 31, 2025 10:35 AM
To: John Walker
Cc: larry.richard@natgasoline.com; Robert.Wiess@natgasoline.com; miguel.martinez@natgasoline.com
Subject: RE: NatGas Title V updated forms uploaded to STEERS- Permit No. O3963, Project 36358

Follow Up Flag: Follow up
Flag Status: Completed

John,

We will review your comments and give you a call or email if we have any questions or clarifications.

Thank you,

David C. Lemoine
Compliance Solutions Group

From: John Walker
Sent: Monday, March 31, 2025 10:15 AM
To: David Lemoine
Cc: larry.richard@natgasoline.com; Robert.Wiess@natgasoline.com; miguel.martinez@natgasoline.com
Subject: RE: NatGas Title V updated forms uploaded to STEERS- Permit No. O3963, Project 36358

Good Morning,

I reviewed the provided updates but there are two items missing from my 02/07/2025 request for information. I have listed them below. Please provide the requested information as soon as possible but no later than **04/04/2025:**

1. The Major NSR Summary Tables for NSR 107764/PSDTX1340 and GHGPSDTX54 were in the Working Draft Permit (WDP) sent on 02/07/2025. The NSR 107764/PSDTX1340 Major NSR Summary Table reflects changes provided on 10/24/2024. However, a Major NSR Summary Table was not provided for GHGPSDTX54. I created a new one based on the 08/09/2024 issuance. Please review it and add the necessary information to the Monitoring and Testing, Recordkeeping, and Reporting Columns.

   I have attached a copy of the Major NSR Summary Table for GHGPSDTX54 that upon completion I will put into the WDP.

   The Major NSR Summary Table Instructions can be found here: Permitting Tools and Guidance for Site Operating Permits - Texas Commission on Environmental Quality - www.tceq.texas.gov

2. The Form OP-PBRSUP and Form OP-REQ1 Page 88 submitted on 01/16/2024 seem to be missing information from previous submittals. Please provide an updated Form OP-PBRSUP and Form OP-REQ1 Page 88 for PBR Information. This is important as Permit Term 15 references the submittal date of Form OP-PBRSUP, so all information should be included in the submittal referenced in the permit term. I will update the submittal date referenced in the permit term when I received the updated Forms.

   Please review the PBR Information in the WDP and ensure that Form OP-REQ1 Page 88, Form OP-PBRSUP, and the New Source Review Authorization References and New Source Review Authorization References by Emissions Unit Tables in the WDP have consistent information.

   There may be units on Form OP-PBRSUP that are not documented in the Title V permit (due to having no Title V requirements) however, any unit authorized by a PBR or any PBR in the New Source Review Authorization References table in the Title V permit, in most cases, should be documented on Form OP-PBRSUP and OP-REQ1 Page 88.

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 these updates have been submitted.

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,

John Walker
Permit Reviewer
OA/Air Permits Division/OP Section
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087
John.Walker@tceq.texas.gov

Phone: (512) 239-1277



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: David Lemoine <dlemoine@compliance-sg.com>
Sent: Tuesday, March 25, 2025 3:06 PM
To: John Walker
Subject: FW: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant

John,

Wanted to follow-up on the Title V permit for Natgasoline. You have any update on status?

Thanks

David C. Lemoine
Compliance Solutions Group

From: John Walker
Sent: Tuesday, March 18, 2025 8:52 AM
To: David Lemoine
Subject: RE: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant

Good Morning David,

I received your phone call. I am aiming to get you a response by this Friday. Sorry for the delay.

Sincerely,

John Walker
Permit Reviewer
OA/Air Permits Division/OP Section
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087
John.Walker@tceq.texas.gov

Phone: (512) 239-1277



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

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From: David Lemoine <dlemoine@compliance-sg.com>
Sent: Tuesday, March 18, 2025 8:18 AM
To: John Walker <John.Walker@tceq.texas.gov>
Subject: Re: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant

John,

I just wanted to check in on the Natgasoline Title V draft permit and see how things were coming along.

Thank you,

David C. Lemoine
Compliance Solutions Group

Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1
Texas Commission on Environmental Quality

Date: 02/14/2025	
Permit No.: O3963	
Regulated Entity No.: RN106586795	
Company Name: Natgasoline LLC	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA?	☒ YES ☐ NO
I. Application Type	
Indicate the type of application:	
☒ Renewal	
☐ Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
☐ Significant Revision	
☐ Revision Requesting Prior Approval	
☐ Administrative Revision	
☐ Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only	☒ YES ☐ NO
For GOP Revisions Only	☐ YES ☐ 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].)*						
☐ VOC	☒ NO_X	☐ SO_2	☐ PM_{10}	☒ CO	☐ Pb	☒ 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)?				☒ YES	☐ NO	☐ 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: 2/14/2025
Permit No.: O3963
Regulated Entity No.: RN106586795
Company Name: Natgasoline LLC

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	ADMIN-G	NO	B-01001, B-14001	OP-UA06 OP-UA01 OP-UA05	107764	AMOC for ammonia analyzer on stacks
2	SIG-C	NO	TK-03007	OP-UA3	107764	Natgasoline removed EPN No. TK-03007 in the renewal and modification to the NSR Permit 107764. The NSR permit was issued on August 9, 2024. TK-03007 is reclassified as a process vessel and throughput, fill rate, and hours of operation requirements have been removed.

3	SIG-C	NO	F-10001	NONE	107764	Under the Flare Design and Operations in the NSR, the Natgasoline permit removed the condition requiring the 1:4 ratio of supplemental gas to waste gas. The Methanol Flare is bound by SC.11.A, which references 40 CFR 60.18 and requires that the vent gas to the flare is maintained above the 200 BTU/scf for un-assisted flares. This 1:4 requirement significantly increases flare emissions. These increased emissions associated with combustion go against our MAERT limits, as well as requires reporting of these excessive emissions under various emission reporting requirements.
4	SIG-C	NO	D-04001	NONE	107764	During Methanol Plant shutdowns, the methanol storage tank emissions may be routed to a temporary VCU, in accordance with the Natgasoline Standard Permit 174371. The NSR permit authorized that the 13 gpm minimum scrubber flow requirement will not apply during this period. In addition, Natgasoline added this activity to the MSS Activity Summary Table - Attachment A in the NSR Permit.
5	SIG-C	NO	F-07502	OP-UA3		Delete diesel tank F-07502
6	SIG-C	NO	F-07503	OP-UA3		Delete diesel tank F-07503
7	SIG-C	NO	F-07504	OP-UA3		Delete diesel tank F-07504
8	SIG-C	NO	F-07505	OP-UA3		Delete diesel tank F-07505
9	SIG-C	NO	F-07501	OP-UA3		Diesel tank F-07501 is to be removed from GRP-TKDSL11

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

Date: 2/14/2025		
Permit No.: O3963		
Regulated Entity No.: RN106586795		
Company Name: Natgasoline LLC		
I.	**Significant Revision** *(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)*	
A.	Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322?	☒ YES ☐ 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?	☐ YES ☒ NO

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

Using the table below, indicate the air pollutant(s) that will be changing and include a brief description of the change in pollutant emissions for each pollutant:

Pollutant	Description of the Change in Pollutant Emissions

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.
2/14/2025	O3963	RN106586795

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
D	2	TK-03007	OP-UA3	Slop Tank		107764	PSDTX1340 GHGPSDTX54
D	5	F-07502	OP-UA3	Diesel Tank		106.472/09/04/2000	
D	6	F-07503	OP-UA3	Diesel Tank		106.472/09/04/2000	
D	7	F-07504	OP-UA3	Diesel Tank		106.472/09/04/2000	
D	8	F-07505	OP-UA3	Diesel Tank		106.472/09/04/2000	

Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR
Table 2

Date	Permit No.	Regulated Entity No.
2/14/2025	O3963	RN106586795

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.
5	F-07502	UA-3	D	GRP-TKDSL2
6	F-07503	UA-3	D	GRP-TKDSL2
7	F-07504	UA-3	D	GRP-TKDSL2
8	F-07505	UA-3	D	GRP-TKDSL1
9	F-07501	UA-3	D	GRP-TKDSL1

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 02/14/2025	**Regulated Entity No.: RN106586795**	**Permit No.: O3963**
Company Name: Natgasoline LLC		**Area Name: Methanol 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**	
The *Responsible Official* 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.		
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?	☒ YES ☐ NO
2.	Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	☒ YES ☐ NO
3.	If the response to Item B.2, above, is "Yes," indicate the total number of Part 2 attachments included in this submittal. *(For reference only)*	4
*	*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.* *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.*	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 02/14/2025	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): B-01001 Reformer

SOP Index No.:

Pollutant: NH_3

Applicable Requirement

Citation	Text Description
NSR Permit 107764, SC 6C	Limit shall not exceed 10 PPMVD NH_3
	corrected to 3% O2 on an hourly average

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
SC 17 CEMS monitoring	Process data analysis	Semi-annual deviation report (SDR) for reporting period 1/1/2024 to 6/30/2024, Item 3

3. Non-compliance Situation Description

NH_3 emissions exceeded 10 PPMVD in reformer stack

4. Corrective Action Plan Description

Natgasoline Operations will revise existing operator training and standard operating procedures to expand the NOx operating window to include a slight increase in allowable NOx emissions and as a result reduce NH3 injection.

5. List of Activities/Milestones to Implement the Corrective Action Plan

Based on our new permit limits for NOx energy (0.015 lb/mmbtu), in the near term Natgasoline Operations will revise existing operator training and standard operating procedures to expand the NOx operating window to include a slight increase in allowable NOx emissions and as a result reduce NH3 injection. It is believed that with optimization, both limits can be met. With the prior NOx energy permit limits, it was a challenge to maintain NOx in compliance without at least some periodic exceedance on ammonia emissions. Estimated implementation date of Q3 2025.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 02/14/2025	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOV of 1/12/2024	03/04/2024
7. Progress Report Submission Schedule	
September 2025	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 02/14/2025	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): B-01001 Reformer

SOP Index No.:

Pollutant: NH_3

Applicable Requirement

Citation	Text Description
NSR Permit 107764 MAERT	Permitted emissions

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
MAERT exceedance	lb/hr limit	Semi-annual deviation report (SDR) for reporting period 1/1/2024 to 6/30/2024, Item 4

3. Non-compliance Situation Description

Permit exceedance in lb/hr

4. Corrective Action Plan Description

Natgasoline Operations will revise existing operator training and standard operating procedures to expand the NOx operating window to include a slight increase in allowable NOx emissions and as a result reduce NH3 injection.

5. List of Activities/Milestones to Implement the Corrective Action Plan

Based on our new permit limits for NOx energy (0.015 lb/mmbtu), Natgasoline Operations will revise existing operator training and standard operating procedures to expand the NOx operating window to include a slight increase in allowable NOx emissions and as a result reduce NH3 injection. It is believed that with optimization, both limits can be met. With the prior NOx energy permit limits, it was a challenge to maintain NOx in compliance without at least some periodic exceedance on ammonia emissions.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 02/14/2025	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOV of 1/12/2024	03/04/2024
7. Progress Report Submission Schedule	
September 2025	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 02/14/2025	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): B-01001 Reformer

SOP Index No.:

Pollutant: N/A

Applicable Requirement

Citation	Text Description
NSR Permit 107764, SC 8C	The percent of natural gas, on an hourly basis, shall not
	exceed the maximum percent of natural gas established
	during performance testing

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
NSR Permit 107764, SC 8C	Natural gas percentage	Semi-annual deviation report (SDR) for reporting period 1/1/2024 to 6/30/2024, Item 6

3. Non-compliance Situation Description

Reformer operated above the maximum total natural gas established through performance testing.

4. Corrective Action Plan Description

Natgasoline has a performance test tentatively scheduled for the first quarter of 2025 to reestablish the maximum percent of natural gas operating condition.

5. List of Activities/Milestones to Implement the Corrective Action Plan

Reestablish the maximum percent of natural gas through a tentatively scheduled performance test in 2025.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 02/14/2025	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOE of 1/12/2024	03/04/2024
7. Progress Report Submission Schedule	
September 2025	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 02/14/2025	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): B-14001 Aux Boiler

SOP Index No.:

Pollutant: $PM_{2.5}$

Applicable Requirement

Citation	Text Description
NSR Permit 107764 MAERT	Permitted emissions

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
MAERT exceedance	lb/hr limit	Semi-annual deviation report (SDR) for reporting period 1/1/2024 to 6/30/2024, Item 14

3. Non-compliance Situation Description

PM 2.5 lb/hr emissions exceeded maximum allowable emission rate during normal operating conditions as per MAERT Table.

4. Corrective Action Plan Description

The previous performance test did not speciate PM2.5 from PM. The emissions from PM2.5 were assumed to be equal to PM10. Natgasoline will conduct a new performance test in the first quarter of 2025 to speciate PM.

5. List of Activities/Milestones to Implement the Corrective Action Plan

Reestablish the PM2.5 emissions limit through a tentatively scheduled performance test in 2025.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 02/14/2025	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
7. Progress Report Submission Schedule	
September 2025	

Texas Commission on Environmental Quality
Miscellaneous Unit Attributes
Form OP-UA1 (Page 1)
Federal Operating Permit Program

Date:	**2/14/2025**
Permit No.:	**O3963**
Regulated Entity No.:	**RN106586795**

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

Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 1)
Federal Operating Permit Program
Table 1a: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)
Subchapter B: Combustion Control at Major Industrial, Commercial, and Institutional Sources in Ozone Nonattainment Areas
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	Horsepower Rating	RACT Date Placed in Service	Functionally Identical Replacement	Type of Service	Fuel Fired	Engine Type	ESAD Date Placed in Service	Diesel HP Rating
H-EMG	**TAC117-01**	**300+**	**FCD+**						
H-FWP1	**TAC117-02**	**300+**	**FCD+**						
H-FWP2	**TAC117-03**	**300+**	**FCD+**						

Stationary Reciprocating Internal Combustion Engine Attributes
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.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	HAP Source	Brake HP	Construction/ Reconstruction Date	Nonindustrial Emergency Engine	Service Type	Stationary RICE Type
H-EMG	**63ZZZZ**	**MAJOR**	**500+**	**06+**		**EMER-A**	
H-FWP1	**63ZZZZ**	**MAJOR**	**500+**	**06+**		**EMER-A**	
H-FWP2	**63ZZZZ**	**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.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	Applicability Date	Exemptions	Service	Commencing	Manufacture Date
H-EMG	**60IIII**	**2005+**	**NONE**	**EMERG**	**CON**	**0406+**
H-FWP1	**60IIII**	**2005+**	**NONE**	**FIRE**	**CON**	**0706+**
H-FWP2	**60IIII**	**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.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	Diesel	AES No.	Displacement	Generator Set	Model Year	Install Date
H-EMG	**60IIII**	**DIESEL**		**10-**		**2014**	
H-FWP1	**60IIII**	**DIESEL**		**10-**		**2014**	
H-FWP2	**60IIII**	**DIESEL**		**10-**		**2014**	

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.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	Kilowatts	Filter	AECD	Standard	Compliance Option	PM Compliance	Options
H-EMG	**60IIII**	**E560-2237**		**YES**	**YES**	**MANU YES**		
H-FWP1	**60IIII**	**F560+**			**YES**	**MANU YES**		
H-FWP2	**60IIII**	**F560+**			**YES**	**MANU YES**		

Process Heater/Furnace Attributes
Form OP-UA5 (Page 1)
Federal Operating Permit Program
Table 1a: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)
Subchapter B: Combustion Control at Major Industrial, Commercial, and Institutional Sources in Ozone Nonattainment Areas, Process Heaters
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	Unit Type	Maximum Rated Capacity	RACT Date Placed in Service	Functionally Identical Replacement	Fuel Type(s)			Annual Heat Input	NOx Emission Limitation	Opt-In Unit	23C-Option
B-01001	R7103	PRHTR	200+	FCD+								

Process Heater/Furnace Attributes
Form OP-UA5 (Page 10)
Federal Operating Permit Program
Table 6a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subchapter DDDDD: Industrial, Commercial, and Institutional Process Heaters
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	Commence	Table Applicability	HCl Emission	HCl-CMS
B-01001	63DDDDD	NEW	T3.1TS		

Process Heater/Furnace Attributes
Form OP-UA5 (Page 1)
Federal Operating Permit Program
Table 1a: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)
Subchapter B: Combustion Control at Major Industrial, Commercial, and Institutional Sources in Ozone Nonattainment Areas, Process Heaters
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	Unit Type	Maximum Rated Capacity	RACT Date Placed in Service	Functionally Identical Replacement	Fuel Type(s)			Annual Heat Input	NOx Emission Limitation	Opt-In Unit	23C-Option
B-01001	R7103	PRHTR	200+	FCD+								

Process Heater/Furnace Attributes
Form OP-UA5 (Page 10)
Federal Operating Permit Program
Table 6a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subchapter DDDDD: Industrial, Commercial, and Institutional Process Heaters
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	Commence	Table Applicability	HCl Emission	HCl-CMS
B-01001	63DDDDD	NEW	T3.1TS		

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 6)
Federal Operating Permit Program
Table 3a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP Index No.	Construction/ Modification Date	Heat Input Capacity	Subpart Da	Changes to Existing Affected Facility	Subpart Ea, Eb, AAAA, or CCCC	Subpart KKKK	Subpart Cb or BBBB	Temporary Boiler
B-14001	60DB	05+CR	250+	NO	NO	NO	NO	NO	NO
B-01002	60DB	05+CR	250+	NO	NO	NO	NO	NO	NO

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 7)
Federal Operating Permit Program
Table 3b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP Index No.	D-Series Fuel Type	D-Series Fuel Type	D-Series Fuel Type	Subpart D	Additional Applicability Requirement	ACF Option SO_2	ACF Option PM	ACF Option NO_X
B-14001	60DB	NG	GFF			NONE	OTHR	OTHR	OTHR
B-01002	60DB	NG	GFF			NONE	OTHR	OTHR	OTHR

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 8)
Federal Operating Permit Program
Table 3c: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP Index No.	60.42b (k)(2) Low Sulfur Exemption	60.42b (k)(4) Alternative	Post-Combustion Control	60.43b(h)(2) Alternative	Electrical or Mechanical Output	Output Based Limit	60.49 Da(n) Alternative	60.49 Da(m) Alternative
B-14001	60DB	YES				NO		NO	NO
B-01002	60DB	YES				NO		NO	NO

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 9)
Federal Operating Permit Program
Table 3d: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP Index No.	Residual Oil Sampling	Monitoring Type PM	Monitoring Type PM (Opacity)	Monitoring Type NO_X	Monitoring Type SO_2	Technology Type	Unit Type	Heat Release Rate	Heat Input Gas/Oil	Heat Input Wood	Fuel Heat Input
B-14001	60DB		NONE	NONE	CEM	FLSMP	NONE	OTHR	NGHIGH			
B-01002	60DB		NONE	NONE	CEM	FLSMP	NONE	OTHR	NGHIGH			

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 13)
Federal Operating Permit Program
Table 5a: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)
Subpart B: Combustion Control at Major Industrial, Commercial and Institutional Sources in Ozone Nonattainment Areas
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP Index No.	Unit Type	MRC	RACT Date Placed in Service	Functionally Identical Replacement	Fuel Type	Fuel Type	Fuel Type	Annual Heat Input
B-14001	R7103	ICIB	250+	FCD+					
B-01002	R7103	ICIB	250+	FCD+					

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 37)
Federal Operating Permit Program
Table 14a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart DDDDD: Industrial, Commercial, and Institutional Boilers
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	Commence	Table Applicability	HCl Emission	HCl-CMS
B-14001	63DDDDD-01	NEW	T3.1TS		

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 6)
Federal Operating Permit Program
Table 3a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP Index No.	Construction/ Modification Date	Heat Input Capacity	Subpart Da	Changes to Existing Affected Facility	Subpart Ea, Eb, AAAA, or CCCC	Subpart KKKK	Subpart Cb or BBBB	Temporary Boiler
B-14001	60DB	05+CR	250+	NO	NO	NO	NO	NO	NO
B-01002	60DB	05+CR	250+	NO	NO	NO	NO	NO	NO

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 7)
Federal Operating Permit Program
Table 3b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP Index No.	D-Series Fuel Type	D-Series Fuel Type	D-Series Fuel Type	Subpart D	Additional Applicability Requirement	ACF Option SO_2	ACF Option PM	ACF Option NO_X
B-14001	60DB	NG	GFF			NONE	OTHR	OTHR	OTHR
B-01002	60DB	NG	GFF			NONE	OTHR	OTHR	OTHR

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 8)
Federal Operating Permit Program
Table 3c: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP Index No.	60.42b (k)(2) Low Sulfur Exemption	60.42b (k)(4) Alternative	Post-Combustion Control	60.43b(h)(2) Alternative	Electrical or Mechanical Output	Output Based Limit	60.49 Da(n) Alternative	60.49 Da(m) Alternative
B-14001	60DB	YES				NO		NO	NO
B-01002	60DB	YES				NO		NO	NO

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 9)
Federal Operating Permit Program
Table 3d: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP Index No.	Residual Oil Sampling	Monitoring Type PM	Monitoring Type PM (Opacity)	Monitoring Type NO_X	Monitoring Type SO_2	Technology Type	Unit Type	Heat Release Rate	Heat Input Gas/Oil	Heat Input Wood	Fuel Heat Input
B-14001	60DB		NONE	NONE	CEM	FLSMP	NONE	OTHR	NGHIGH			
B-01002	60DB		NONE	NONE	CEM	FLSMP	NONE	OTHR	NGHIGH			

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 13)
Federal Operating Permit Program
Table 5a: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)
Subpart B: Combustion Control at Major Industrial, Commercial and Institutional Sources in Ozone Nonattainment Areas
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP Index No.	Unit Type	MRC	RACT Date Placed in Service	Functionally Identical Replacement	Fuel Type	Fuel Type	Fuel Type	Annual Heat Input
B-14001	R7103	ICIB	250+	FCD+					
B-01002	R7103	ICIB	250+	FCD+					

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 37)
Federal Operating Permit Program
Table 14a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart DDDDD: Industrial, Commercial, and Institutional Boilers
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	Commence	Table Applicability	HCl Emission	HCl-CMS
B-14001	63DDDDD-01	NEW	T3.1TS		

Texas Commission on Environmental Quality

Title V Existing

3963

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	NATGASOLINE METHANOL PLANT
Does the site have a physical address?	No
Because there is no physical address, describe how to locate this site:	2366 Sulphur Plant Road
City	Beaumont
State	TX
ZIP	77705
County	JEFFERSON
Latitude (N) (##.######)	30.012222
Longitude (W) (-###.######)	94.036388
Primary SIC Code	2869
Secondary SIC Code	
Primary NAICS Code	325199
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN106586795
What is the name of the Regulated Entity (RE)?	BEAUMONT GAS TO GASOLINE PLANT
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	2366 SULPHUR PLANT RD
City	BEAUMONT
State	TX
ZIP	77705
County	JEFFERSON
Latitude (N) (##.######)	30.03143
Longitude (W) (-###.######)	-94.05388
Facility NAICS Code	
What is the primary business of this entity?	CHEMICAL MANUFACTURING

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN604256412
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Natgasoline LLC
Texas SOS Filing Number	801689918
Federal Tax ID	680682889
State Franchise Tax ID	32049571162
State Sales Tax ID	

Local Tax ID	
DUNS Number	79934278
Number of Employees	101-250
Independently Owned and Operated?	No

Responsible Official Contact

Person TCEQ should contact for questions about this application:	
Organization Name	NATGASOLINE LLC
Prefix	MR
First	LARRY
Middle	
Last	RICHARD
Suffix	
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)	PO BOX 20339
Routing (such as Mail Code, Dept., or Attn:)	
City	BEAUMONT
State	TX
ZIP	77720
Phone (###-###-####)	4093444900
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	larry.richard@natgasoline.com

Technical Contact

Person TCEQ should contact for questions about this application:	
Select existing TC contact or enter a new contact.	MIGUEL MARTINEZ(NATGASOLINE LLC...)
Organization Name	NATGASOLINE LLC
Prefix	MR
First	MIGUEL
Middle	
Last	MARTINEZ
Suffix	
Credentials	
Title	ENVIRONMENTAL MANAGER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 20339

Routing (such as Mail Code, Dept., or Attn:)	
City	BEAUMONT
State	TX
ZIP	77720
Phone (###-###-####)	4093444974
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	miguel.martinez@natgasoline.com

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	30 Deg 0 Min 44 Sec
3) Permit Longitude Coordinate:	94 Deg 2 Min 11 Sec
4) Is this submittal a new application or an update to an existing application?	Update
4.1. Select the permit/project number for which this update should be applied.	3963-36358
5) 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)

[File Properties]

File Name	OP_2_Form OP-2 (2.14.25).pdf
Hash	7490CF40171DF920CF2784860F902981F6885C53BBAA62B023639BB8045B98EC
MIME-Type	application/pdf

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)

[File Properties]

File Name	OP_SUMR_Form OP-SUMR (2.14.25).pdf
Hash	4555554C2D4B96445CB9A037ED565337BAA9DF698B60D36DEDE83DDA32581BB7
MIME-Type	application/pdf

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

[File Properties]

File Name	Form OP-UA1 (2.14.2025).pdf
Hash	C4D1F35DEE844D76F75E8F4203FB17C2E234F685EA34BA130A8872EDEEAAB82D
MIME-Type	application/pdf

[File Properties]

File Name	Form OP-UA2 (2.14.25).pdf
Hash	06A31052D75446373A59E90EE3258C951D7D2D20C9A57EDAD5AC977C0A8300E1
MIME-Type	application/pdf

[File Properties]

File Name	Form OP-UA5 (2.14.25).pdf
Hash	BB481EAB92FA9BD55A5DA4336AA3BADE7D07207623C39AFA500DAF13A0B51F1D
MIME-Type	application/pdf

[File Properties]

File Name	Form OP-UA6 (2.14.2025).pdf
Hash	18698F64DC2EC8A82305690162514002F97B868E72545357908891F5B28DE62E
MIME-Type	application/pdf

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 Void Request Form

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name	Form OP-ACPS (2.14.2025).pdf
Hash	BD36814F973979AEEC23A1F1015D3DD3D9546837338FA9990BCFDBC8F2C9EB49
MIME-Type	application/pdf

An additional space to attach any other necessary information needed to complete the permit.

Certification

I certify that I am the Responsible Official 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 Larry Richard, the owner of the STEERS account ER103291.
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 enforcemer 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 3963.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEC

OWNER OPERATOR Signature: Larry Richard OWNER OPERATOR

Account Number:	ER103291
Signature IP Address:	38.104.61.226
Signature Date:	2025-02-25
Signature Hash:	85B1218A1685B74C1CF677E0344928F6F6782E4E9428C83BA571E980E1FC09D5
Form Hash Code at time of Signature:	2823C795A32FC6B5D7638CBDA0BD56ACDDABF9CF5E5CDC657FDFA56E8455E380

Submission

Reference Number:	The application reference number is 758189
Submitted by:	The application was submitted by ER103291/Larry Richard
Submitted Timestamp:	The application was submitted on 2025-02-25 at 08:35:22 CST
Submitted From:	The application was submitted from IP address 38.104.61.226
Confirmation Number:	The confirmation number is 633406
Steers Version:	The STEERS version is 6.87
Permit Number:	The permit number is 3963

Additional Information

Application Creator: This account was created by Charles M Munley JR

From: David Lemoine <dlemoine@compliance-sg.com>
Sent: Monday, February 24, 2025 9:26 AM
To: John Walker
Cc: larry.richard@natgasoline.com; Robert.Wiess@natgasoline.com; miguel.martinez@natgasoline.com
Subject: NatGas Title V updated forms uploaded to STEERS- Permit No. O3963, Project 36358
Attachments: Form OP-UA2 (2.14.25).pdf; Form OP-UA5 (2.14.25).pdf; Form OP-UA6 (2.14.2025).pdf; Form OP-2 (2.14.25).pdf; Form OP-ACPS (2.14.2025).pdf; Form OP-SUMR (2.14.25).pdf; Form OP-UA1 (2.14.2025).pdf

Follow Up Flag: Follow up
Flag Status: Completed

John,

As follow-up to our conversation, attached please find the updated "Unit Attribute" forms that have been uploaded into STEERs. As indicated during our call, Natgasoline had a TCEQ TPDES audit last week as well as had other site visitors that required full attendance of the envr. staff and Site Manager. Natgasoline, will formally certify and submit the updated forms via STEERs later in the week when the Site Manager is back on-site. In the meantime, please see the revised forms that have been revised and uploaded for your review.

Thanks again and we appreciate your assistance in this matter. If you have any questions, please give me a call of email.

David C. Lemoine
Compliance Solutions Group

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 6)
Federal Operating Permit Program
Table 3a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP Index No.	Construction/ Modification Date	Heat Input Capacity	Subpart Da	Changes to Existing Affected Facility	Subpart Ea, Eb, AAAA, or CCCC	Subpart KKKK	Subpart Cb or BBBB	Temporary Boiler
B-14001	60DB	05+CR	250+	NO	NO	NO	NO	NO	NO
B-01002	60DB	05+CR	250+	NO	NO	NO	NO	NO	NO

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 7)
Federal Operating Permit Program
Table 3b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP Index No.	D-Series Fuel Type	D-Series Fuel Type	D-Series Fuel Type	Subpart D	Additional Applicability Requirement	ACF Option SO_2	ACF Option PM	ACF Option NO_X
B-14001	60DB	NG	GFF			NONE	OTHR	OTHR	OTHR
B-01002	60DB	NG	GFF			NONE	OTHR	OTHR	OTHR

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 8)
Federal Operating Permit Program
Table 3c: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP Index No.	60.42b (k)(2) Low Sulfur Exemption	60.42b (k)(4) Alternative	Post-Combustion Control	60.43b(h)(2) Alternative	Electrical or Mechanical Output	Output Based Limit	60.49 Da(n) Alternative	60.49 Da(m) Alternative
B-14001	60DB	YES				NO		NO	NO
B-01002	60DB	YES				NO		NO	NO

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 9)
Federal Operating Permit Program
Table 3d: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP Index No.	Residual Oil Sampling	Monitoring Type PM	Monitoring Type PM (Opacity)	Monitoring Type NO_X	Monitoring Type SO_2	Technology Type	Unit Type	Heat Release Rate	Heat Input Gas/Oil	Heat Input Wood	Fuel Heat Input
B-14001	60DB		NONE	NONE	CEM	FLSMP	NONE	OTHR	NGHIGH			
B-01002	60DB		NONE	NONE	CEM	FLSMP	NONE	OTHR	NGHIGH			

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 13)
Federal Operating Permit Program
Table 5a: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)
Subpart B: Combustion Control at Major Industrial, Commercial and Institutional Sources in Ozone Nonattainment Areas
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP Index No.	Unit Type	MRC	RACT Date Placed in Service	Functionally Identical Replacement	Fuel Type	Fuel Type	Fuel Type	Annual Heat Input
B-14001	R7103	ICIB	250+	FCD+					
B-01002	R7103	ICIB	250+	FCD+					

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 37)
Federal Operating Permit Program
Table 14a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart DDDDD: Industrial, Commercial, and Institutional Boilers
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	Commence	Table Applicability	HCl Emission	HCl-CMS
B-14001	63DDDDD-01	NEW	T3.1TS		

Process Heater/Furnace Attributes
Form OP-UA5 (Page 1)
Federal Operating Permit Program
Table 1a: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)
Subchapter B: Combustion Control at Major Industrial, Commercial, and Institutional Sources in Ozone Nonattainment Areas, Process Heaters
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	Unit Type	Maximum Rated Capacity	RACT Date Placed in Service	Functionally Identical Replacement	Fuel Type(s)			Annual Heat Input	NOx Emission Limitation	Opt-In Unit	23C-Option
B-01001	R7103	PRHTR	200+	FCD+								

Process Heater/Furnace Attributes
Form OP-UA5 (Page 10)
Federal Operating Permit Program
Table 6a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subchapter DDDDD: Industrial, Commercial, and Institutional Process Heaters
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	Commence	Table Applicability	HCl Emission	HCl-CMS
B-01001	63DDDDD	NEW	T3.1TS		

Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 1)
Federal Operating Permit Program
Table 1a: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)
Subchapter B: Combustion Control at Major Industrial, Commercial, and Institutional Sources in Ozone Nonattainment Areas
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	Horsepower Rating	RACT Date Placed in Service	Functionally Identical Replacement	Type of Service	Fuel Fired	Engine Type	ESAD Date Placed in Service	Diesel HP Rating
H-EMG	**TAC117-01**	**300+**	**FCD+**						
H-FWP1	**TAC117-02**	**300+**	**FCD+**						
H-FWP2	**TAC117-03**	**300+**	**FCD+**						

Stationary Reciprocating Internal Combustion Engine Attributes
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.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	HAP Source	Brake HP	Construction/ Reconstruction Date	Nonindustrial Emergency Engine	Service Type	Stationary RICE Type
H-EMG	**63ZZZZ**	**MAJOR**	**500+**	**06+**		**EMER-A**	
H-FWP1	**63ZZZZ**	**MAJOR**	**500+**	**06+**		**EMER-A**	
H-FWP2	**63ZZZZ**	**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.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	Applicability Date	Exemptions	Service	Commencing	Manufacture Date
H-EMG	**60IIII**	**2005+**	**NONE**	**EMERG**	**CON**	**0406+**
H-FWP1	**60IIII**	**2005+**	**NONE**	**FIRE**	**CON**	**0706+**
H-FWP2	**60IIII**	**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.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	Diesel	AES No.	Displacement	Generator Set	Model Year	Install Date
H-EMG	**60IIII**	**DIESEL**		**10-**		**2014**	
H-FWP1	**60IIII**	**DIESEL**		**10-**		**2014**	
H-FWP2	**60IIII**	**DIESEL**		**10-**		**2014**	

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.
2/14/2025	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	Kilowatts	Filter	AECD	Standard	Compliance Option	PM Compliance	Options
H-EMG	**60IIII**	**E560-2237**		**YES**	**YES**	**MANU YES**		
H-FWP1	**60IIII**	**F560+**			**YES**	**MANU YES**		
H-FWP2	**60IIII**	**F560+**			**YES**	**MANU YES**		

Texas Commission on Environmental Quality
Miscellaneous Unit Attributes
Form OP-UA1 (Page 1)
Federal Operating Permit Program

Date:	**2/14/2025**
Permit No.:	**O3963**
Regulated Entity No.:	**RN106586795**

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

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.
2/14/2025	O3963	RN106586795

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
D	2	TK-03007	OP-UA3	Slop Tank		107764	PSDTX1340 GHGPSDTX54
D	5	F-07502	OP-UA3	Diesel Tank		106.472/09/04/2000	
D	6	F-07503	OP-UA3	Diesel Tank		106.472/09/04/2000	
D	7	F-07504	OP-UA3	Diesel Tank		106.472/09/04/2000	
D	8	F-07505	OP-UA3	Diesel Tank		106.472/09/04/2000	

Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR
Table 2

Date	Permit No.	Regulated Entity No.
2/14/2025	O3963	RN106586795

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.
5	F-07502	UA-3	D	GRP-TKDSL2
6	F-07503	UA-3	D	GRP-TKDSL2
7	F-07504	UA-3	D	GRP-TKDSL2
8	F-07505	UA-3	D	GRP-TKDSL1
9	F-07501	UA-3	D	GRP-TKDSL1

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 02/14/2025	**Regulated Entity No.: RN106586795**	**Permit No.: O3963**
Company Name: Natgasoline LLC		**Area Name: Methanol 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**	
The *Responsible Official* 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.		
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?	☒ YES ☐ NO
2.	Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	☒ YES ☐ NO
3.	If the response to Item B.2, above, is "Yes," indicate the total number of Part 2 attachments included in this submittal. *(For reference only)*	4
*	*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.* *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.*	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 02/14/2025	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): B-01001 Reformer

SOP Index No.:

Pollutant: NH_3

Applicable Requirement

Citation	Text Description
NSR Permit 107764, SC 6C	Limit shall not exceed 10 PPMVD NH_3
	corrected to 3% O2 on an hourly average

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
SC 17 CEMS monitoring	Process data analysis	Semi-annual deviation report (SDR) for reporting period 1/1/2024 to 6/30/2024, Item 3

3. Non-compliance Situation Description

NH_3 emissions exceeded 10 PPMVD in reformer stack

4. Corrective Action Plan Description

Natgasoline Operations will revise existing operator training and standard operating procedures to expand the NOx operating window to include a slight increase in allowable NOx emissions and as a result reduce NH3 injection.

5. List of Activities/Milestones to Implement the Corrective Action Plan

Based on our new permit limits for NOx energy (0.015 lb/mmbtu), in the near term Natgasoline Operations will revise existing operator training and standard operating procedures to expand the NOx operating window to include a slight increase in allowable NOx emissions and as a result reduce NH3 injection. It is believed that with optimization, both limits can be met. With the prior NOx energy permit limits, it was a challenge to maintain NOx in compliance without at least some periodic exceedance on ammonia emissions. Estimated implementation date of Q3 2025.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 02/14/2025	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOV of 1/12/2024	03/04/2024
7. Progress Report Submission Schedule	
September 2025	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 02/14/2025	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): B-01001 Reformer

SOP Index No.:

Pollutant: NH_3

Applicable Requirement

Citation	Text Description
NSR Permit 107764 MAERT	Permitted emissions

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
MAERT exceedance	lb/hr limit	Semi-annual deviation report (SDR) for reporting period 1/1/2024 to 6/30/2024, Item 4

3. Non-compliance Situation Description

Permit exceedance in lb/hr

4. Corrective Action Plan Description

Natgasoline Operations will revise existing operator training and standard operating procedures to expand the NOx operating window to include a slight increase in allowable NOx emissions and as a result reduce NH3 injection.

5. List of Activities/Milestones to Implement the Corrective Action Plan

Based on our new permit limits for NOx energy (0.015 lb/mmbtu), Natgasoline Operations will revise existing operator training and standard operating procedures to expand the NOx operating window to include a slight increase in allowable NOx emissions and as a result reduce NH3 injection. It is believed that with optimization, both limits can be met. With the prior NOx energy permit limits, it was a challenge to maintain NOx in compliance without at least some periodic exceedance on ammonia emissions.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 02/14/2025	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOV of 1/12/2024	03/04/2024
7. Progress Report Submission Schedule	
September 2025	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 02/14/2025	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): B-01001 Reformer

SOP Index No.:

Pollutant: N/A

Applicable Requirement

Citation	Text Description
NSR Permit 107764, SC 8C	The percent of natural gas, on an hourly basis, shall not
	exceed the maximum percent of natural gas established
	during performance testing

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
NSR Permit 107764, SC 8C	Natural gas percentage	Semi-annual deviation report (SDR) for reporting period 1/1/2024 to 6/30/2024, Item 6

3. Non-compliance Situation Description

Reformer operated above the maximum total natural gas established through performance testing.

4. Corrective Action Plan Description

Natgasoline has a performance test tentatively scheduled for the first quarter of 2025 to reestablish the maximum percent of natural gas operating condition.

5. List of Activities/Milestones to Implement the Corrective Action Plan

Reestablish the maximum percent of natural gas through a tentatively scheduled performance test in 2025.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 02/14/2025	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOE of 1/12/2024	03/04/2024
7. Progress Report Submission Schedule	
September 2025	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 02/14/2025	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): B-14001 Aux Boiler

SOP Index No.:

Pollutant: $PM_{2.5}$

Applicable Requirement

Citation	Text Description
NSR Permit 107764 MAERT	Permitted emissions

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
MAERT exceedance	lb/hr limit	Semi-annual deviation report (SDR) for reporting period 1/1/2024 to 6/30/2024, Item 14

3. Non-compliance Situation Description

PM 2.5 lb/hr emissions exceeded maximum allowable emission rate during normal operating conditions as per MAERT Table.

4. Corrective Action Plan Description

The previous performance test did not speciate PM2.5 from PM. The emissions from PM2.5 were assumed to be equal to PM10. Natgasoline will conduct a new performance test in the first quarter of 2025 to speciate PM.

5. List of Activities/Milestones to Implement the Corrective Action Plan

Reestablish the PM2.5 emissions limit through a tentatively scheduled performance test in 2025.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 02/14/2025	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
7. Progress Report Submission Schedule	
September 2025	

Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1
Texas Commission on Environmental Quality

Date: 02/14/2025	
Permit No.: O3963	
Regulated Entity No.: RN106586795	
Company Name: Natgasoline LLC	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA?	☒ YES ☐ NO
I. Application Type	
Indicate the type of application:	
☒ Renewal	
☐ Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
☐ Significant Revision	
☐ Revision Requesting Prior Approval	
☐ Administrative Revision	
☐ Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only	☒ YES ☐ NO
For GOP Revisions Only	☐ YES ☐ 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].)*						
☐ VOC	☒ NO_X	☐ SO_2	☐ PM_{10}	☒ CO	☐ Pb	☒ 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)?				☒ YES	☐ NO	☐ 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: 2/14/2025
Permit No.: O3963
Regulated Entity No.: RN106586795
Company Name: Natgasoline LLC

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	ADMIN-G	NO	B-01001, B-14001	OP-UA06 OP-UA01 OP-UA05	107764	AMOC for ammonia analyzer on stacks
2	SIG-C	NO	TK-03007	OP-UA3	107764	Natgasoline removed EPN No. TK-03007 in the renewal and modification to the NSR Permit 107764. The NSR permit was issued on August 9, 2024. TK-03007 is reclassified as a process vessel and throughput, fill rate, and hours of operation requirements have been removed.

3	SIG-C	NO	F-10001	NONE	107764	Under the Flare Design and Operations in the NSR, the Natgasoline permit removed the condition requiring the 1:4 ratio of supplemental gas to waste gas. The Methanol Flare is bound by SC.11.A, which references 40 CFR 60.18 and requires that the vent gas to the flare is maintained above the 200 BTU/scf for un-assisted flares. This 1:4 requirement significantly increases flare emissions. These increased emissions associated with combustion go against our MAERT limits, as well as requires reporting of these excessive emissions under various emission reporting requirements.
4	SIG-C	NO	D-04001	NONE	107764	During Methanol Plant shutdowns, the methanol storage tank emissions may be routed to a temporary VCU, in accordance with the Natgasoline Standard Permit 174371. The NSR permit authorized that the 13 gpm minimum scrubber flow requirement will not apply during this period. In addition, Natgasoline added this activity to the MSS Activity Summary Table - Attachment A in the NSR Permit.
5	SIG-C	NO	F-07502	OP-UA3		Delete diesel tank F-07502
6	SIG-C	NO	F-07503	OP-UA3		Delete diesel tank F-07503
7	SIG-C	NO	F-07504	OP-UA3		Delete diesel tank F-07504
8	SIG-C	NO	F-07505	OP-UA3		Delete diesel tank F-07505
9	SIG-C	NO	F-07501	OP-UA3		Diesel tank F-07501 is to be removed from GRP-TKDSL11

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

Date: 2/14/2025		
Permit No.: O3963		
Regulated Entity No.: RN106586795		
Company Name: Natgasoline LLC		
I.	**Significant Revision** *(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)*	
A.	Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322?	☒ YES ☐ 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?	☐ YES ☒ NO

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

Using the table below, indicate the air pollutant(s) that will be changing and include a brief description of the change in pollutant emissions for each pollutant:

Pollutant	Description of the Change in Pollutant Emissions

From:	John Walker
Sent:	Thursday, February 13, 2025 5:05 PM
To:	Jordan Hollier
Cc:	David Lemoine; Marty Munley
Subject:	RE: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant
Attachments:	Form OP-2 (2.13.25)_Jwalker comments.docx; Form OP-SUMR (2.13.25) (002)_Jwalker comments.docx

Good Afternoon,

I have some minor comments on the attached OP-2 and OP-SUMR, other than that they look good.

Please let me know if you have any additional questions.

Sincerely,

John Walker
Permit Reviewer
OA/Air Permits Division/OP Section
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087
John.Walker@tceq.texas.gov

Phone: (512) 239-1277



How are we doing? Fill out our online customer satisfaction survey at 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.
2/13/2025	O3963	RN106586795

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
D	2	TK-03007	OP-UA3	Slop Tank		107764	PSDTX1340 GHGPSDTX54
D	5	F-07502	OP-UA3	Diesel Tank		106.472/09/04/2000	
D	6	F-07503	OP-UA3	Diesel Tank		106.472/09/04/2000	
D	7	F-07504	OP-UA3	Diesel Tank		106.472/09/04/2000	
D	8	F-07505	OP-UA3	Diesel Tank		106.472/09/04/2000	

Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR
Table 2

Date	Permit No.	Regulated Entity No.
2/13/2025	O3963	RN106586795

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.
5	F-07502	UA-3		GRP-TKDSL2
6	F-07503	UA-3		GRP-TKDSL2
7	F-07504	UA-3		GRP-TKDSL2
8	F-07505	UA-3		GRP-TKDSL1
9	F-07501	UA-3		GRP-TKDSL1

Commented [JW1]: "D" should be added in this column to indicate a deletion from the group.

Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1
Texas Commission on Environmental Quality

Date: 10/23/2024	
Permit No.: O3963	
Regulated Entity No.: RN106586795	
Company Name: Natgasoline LLC	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA?	☒ YES ☐ NO
I. Application Type	
Indicate the type of application:	
☒ Renewal	
☐ Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
☐ Significant Revision	
☐ Revision Requesting Prior Approval	
☐ Administrative Revision	
☐ Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only	☒ YES ☐ NO
For GOP Revisions Only	☐ YES ☐ NO

Commented [JW1]: I would update the date for whenever this is submitted in STEERS.

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].)*						
☐ VOC	☒ NO_X	☐ SO_2	☐ PM_{10}	☒ CO	☐ Pb	☒ 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)?				☒ YES	☐ NO	☐ 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: 2/13/2025
Permit No.: O3963
Regulated Entity No.: RN106586795
Company Name: Natgasoline LLC

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	ADMIN-G	NO	B-01001, B-14001	OP-UA06 OP-UA01 OP-UA05	107764	AMOC for ammonia analyzer on stacks
2	SIG-C	NO	TK-03007	OP-UA3	107764	Natgasoline removed EPN No. TK-03007 in the renewal and modification to the NSR Permit 107764. The NSR permit was issued on August 9, 2024. TK-03007 is reclassified as a process vessel and throughput, fill rate, and hours of operation requirements have been removed.

3	SIG-C	NO	F-10001	NONE	107764	Under the Flare Design and Operations in the NSR, the Natgasoline permit removed the condition requiring the 1:4 ratio of supplemental gas to waste gas. The Methanol Flare is bound by SC.11.A, which references 40 CFR 60.18 and requires that the vent gas to the flare is maintained above the 200 BTU/scf for un-assisted flares. This 1:4 requirement significantly increases flare emissions. These increased emissions associated with combustion go against our MAERT limits, as well as requires reporting of these excessive emissions under various emission reporting requirements.
4	SIG-C	NO	D-04001	NONE	107764	During Methanol Plant shutdowns, the methanol storage tank emissions may be routed to a temporary VCU, in accordance with the Natgasoline Standard Permit 174371. The NSR permit authorized that the 13 gpm minimum scrubber flow requirement will not apply during this period. In addition, Natgasoline added this activity to the MSS Activity Summary Table - Attachment A in the NSR Permit.
5	SIG-C	NO	F-07502	OP-UA3		Delete diesel tank F-07502
6	SIG-C	NO	F-07503	OP-UA3		Delete diesel tank F-07503
7	SIG-C	NO	F-07504	OP-UA3		Delete diesel tank F-07504
8	SIG-C	NO	F-07505	OP-UA3		Delete diesel tank F-07505
9	SIG-C	NO	F-0701	OP-UA3		Diesel tank F-07501 is to be removed from GRP-TKDSL11

Commented [JW2]: This should be F-07501.

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

Date: 10/23/2024		
Permit No.: O3963		
Regulated Entity No.: RN106586795		
Company Name: Natgasoline LLC		
I.	**Significant Revision** *(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)*	
A.	Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322?	☒ YES ☐ 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?	☐ YES ☒ NO

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

Using the table below, indicate the air pollutant(s) that will be changing and include a brief description of the change in pollutant emissions for each pollutant:

Pollutant	Description of the Change in Pollutant Emissions

From: Jordan Hollier <jhollier@compliance-sg.com>
Sent: Thursday, February 13, 2025 4:37 PM
To: John Walker
Cc: David Lemoine; Marty Munley
Subject: RE: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant
Attachments: Form OP-2 (2.13.25).docx; Form OP-SUMR (2.13.25).docx

John,

Thank you for the quick response. To further clarify, please see the changes to OP-SUMR and OP-2.

OP-2 lists all revisions, deleting tanks F-07502, F-07503, F-07504, and F-07505, and the removal of F-07501 from GRP-TKDSL1. These revisions are again summarized in OP-SUMR Table 1 and Table 2.

Please let me know if this is what you are looking for.

Thank you,

Jordan

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.
2/13/2025	O3963	RN106586795

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
D	2	TK-03007	OP-UA3	Slop Tank		107764	PSDTX1340 GHGPSDTX54
D	5	F-07502	OP-UA3	Diesel Tank		106.472/09/04/2000	
D	6	F-07503	OP-UA3	Diesel Tank		106.472/09/04/2000	
D	7	F-07504	OP-UA3	Diesel Tank		106.472/09/04/2000	
D	8	F-07505	OP-UA3	Diesel Tank		106.472/09/04/2000	

Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR
Table 2

Date	Permit No.	Regulated Entity No.
2/13/2025	O3963	RN106586795

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.
5	F-07502	UA-3		GRP-TKDSL2
6	F-07503	UA-3		GRP-TKDSL2
7	F-07504	UA-3		GRP-TKDSL2
8	F-07505	UA-3		GRP-TKDSL1
9	F-07501	UA-3		GRP-TKDSL1

Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1
Texas Commission on Environmental Quality

Date: 10/23/2024	
Permit No.: O3963	
Regulated Entity No.: RN106586795	
Company Name: Natgasoline LLC	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA?	☒ YES ☐ NO
I. Application Type	
Indicate the type of application:	
☒ Renewal	
☐ Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
☐ Significant Revision	
☐ Revision Requesting Prior Approval	
☐ Administrative Revision	
☐ Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only	☒ YES ☐ NO
For GOP Revisions Only	☐ YES ☐ 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].)*						
☐ VOC	☒ NO_X	☐ SO_2	☐ PM_{10}	☒ CO	☐ Pb	☒ 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)?				☒ YES	☐ NO	☐ 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: 2/13/2025
Permit No.: O3963
Regulated Entity No.: RN106586795
Company Name: Natgasoline LLC

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	ADMIN-G	NO	B-01001, B-14001	OP-UA06 OP-UA01 OP-UA05	107764	AMOC for ammonia analyzer on stacks
2	SIG-C	NO	TK-03007	OP-UA3	107764	Natgasoline removed EPN No. TK-03007 in the renewal and modification to the NSR Permit 107764. The NSR permit was issued on August 9, 2024. TK-03007 is reclassified as a process vessel and throughput, fill rate, and hours of operation requirements have been removed.

3	SIG-C	NO	F-10001	NONE	107764	Under the Flare Design and Operations in the NSR, the Natgasoline permit removed the condition requiring the 1:4 ratio of supplemental gas to waste gas. The Methanol Flare is bound by SC.11.A, which references 40 CFR 60.18 and requires that the vent gas to the flare is maintained above the 200 BTU/scf for un-assisted flares. This 1:4 requirement significantly increases flare emissions. These increased emissions associated with combustion go against our MAERT limits, as well as requires reporting of these excessive emissions under various emission reporting requirements.
4	SIG-C	NO	D-04001	NONE	107764	During Methanol Plant shutdowns, the methanol storage tank emissions may be routed to a temporary VCU, in accordance with the Natgasoline Standard Permit 174371. The NSR permit authorized that the 13 gpm minimum scrubber flow requirement will not apply during this period. In addition, Natgasoline added this activity to the MSS Activity Summary Table - Attachment A in the NSR Permit.
5	SIG-C	NO	F-07502	OP-UA3		Delete diesel tank F-07502
6	SIG-C	NO	F-07503	OP-UA3		Delete diesel tank F-07503
7	SIG-C	NO	F-07504	OP-UA3		Delete diesel tank F-07504
8	SIG-C	NO	F-07505	OP-UA3		Delete diesel tank F-07505
9	SIG-C	NO	F-0701	OP-UA3		Diesel tank F-07501 is to be removed from GRP-TKDSL11

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

Date: 10/23/2024		
Permit No.: O3963		
Regulated Entity No.: RN106586795		
Company Name: Natgasoline LLC		
I.	**Significant Revision** *(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)*	
A.	Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322?	☒ YES ☐ 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?	☐ YES ☒ NO

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

Using the table below, indicate the air pollutant(s) that will be changing and include a brief description of the change in pollutant emissions for each pollutant:

Pollutant	Description of the Change in Pollutant Emissions

From: John Walker
Sent: Thursday, February 13, 2025 3:38 PM
To: 'Jordan Hollier'
Cc: Marty Munley; David Lemoine
Subject: RE: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant
Attachments: Form OP-SUMR (2.13.25)_JWalker comments.docx

Good Afternoon,

A group must have more than one unit with identical unit attributes. So, if Unit ID F-07505 is removed from the permit and there is no other unit in GRP-TKDSL1 but F-07501, GRP-TKDSL1 will be removed and Unit ID F-07501 will be documented by itself in the permit without a group.

Form OP-SUMR Table 1 is where the deletion of units should be documented. You should also add a corresponding revision item on Form OP-2 Table 2 stating you are deleting the desired units.

Please note that Form OP-SUMR Table 2 is where you would add/remove units from groups. If Unit ID F-07501 is going to remain in the permit by itself, please also document on Form OP-SUMR Table 2 that you are removing it from GRP-TKDSL1. You should also document the units you are removing from the permit that are being deleted from their groups on Form OP-SUMR Table 2 as well.

I have also added comments to your Form OP-SUMR to clarify some preconstruction authorization information.

Please let me know if you have additional questions.

Sincerely,

John Walker
Permit Reviewer
OA/Air Permits Division/OP Section
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087
John.Walker@tceq.texas.gov

Phone: (512) 239-1277



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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.
2/13/2025	O3963	RN106586795

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
D	2	TK-03007	OP-UA3	Slop Tank		107764	107764
D		F-07502	OP-UA3	Diesel Tank		107764	107764
D		F-07503	OP-UA3	Diesel Tank		107764	107764
D		F-07504	OP-UA3	Diesel Tank		107764	107764
D		F-07505	OP-UA3	Diesel Tank		107764	107764

Commented [JW1]: This should be PSDTX1340 and GHGPSDTX54 per previously submitted information.

Commented [JW2]: If you look at page 53 of the WDP, in the New Source Review Authorization References by Emissions Unit Table, you will see these units have PBR 106.472/09/04/2000 as the preconstruction authorization.

Preconstruction Authorizations Title I should be blank for F-07502 - F-07505.

Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR
Table 2

Date	Permit No.	Regulated Entity No.
2/21/2024	O3963	RN106586795

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.

From: Jordan Hollier <jhollier@compliance-sg.com>
Sent: Thursday, February 13, 2025 3:05 PM
To: John Walker
Cc: Marty Munley; David Lemoine
Subject: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant
Attachments: Form OP-SUMR (2.13.25).docx

John,

We need to delete diesel storage tanks F-07502, F-07503, F-07504, and F-07505 from the original permit. These tanks were never required for site operations.

Also, F-07505 is part of GRP-TKDSL1 along with F-07501. We want to keep F-07501. Is it possible to delete F-07505 from this group and leave the group intact in the permit?

Would OP-SUMR be the appropriate form to delete these tanks from the permit? See the attached form.

Please let me know.

Thank you,

Jordan Hollier
Compliance Solutions Group
16851 Jefferson Highway, Suite 6D
Baton Rouge, LA 70817
Phone: (225) 754-0405

COMPLIANCE SOLUTIONS CSG GROUP

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.
2/13/2025	O3963	RN106586795

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
D	2	TK-03007	OP-UA3	Slop Tank		107764	107764
D		F-07502	OP-UA3	Diesel Tank		107764	107764
D		F-07503	OP-UA3	Diesel Tank		107764	107764
D		F-07504	OP-UA3	Diesel Tank		107764	107764
D		F-07505	OP-UA3	Diesel Tank		107764	107764

Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR
Table 2

Date	Permit No.	Regulated Entity No.
2/21/2024	O3963	RN106586795

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.

From: David Lemoine <dlemoine@compliance-sg.com>
Sent: Wednesday, February 12, 2025 7:20 AM
To: John Walker
Cc: Jordan Hollier
Subject: RE: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant

John,

We are going through your comments and had a quick question regarding the PBRs. Please give me a call at 225 754-0405 when you have a chance.

Thanks

David C. Lemoine
Compliance Solutions Group

From: John Walker <John.Walker@tceq.texas.gov>
Sent: Friday, February 7, 2025 5:26 PM
To: David Lemoine <dlemoine@compliance-sg.com>
Cc: Jordan Hollier <jhollier@compliance-sg.com>; Marty Munley <mmunley@compliance-sg.com>; Miguel Martinez <Miguel.Martinez@natgasoline.com>; Philip Curwick <pcurwick@compliance-sg.com>
Subject: Working Draft Permit - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant

Good Afternoon,

I have conducted a technical review of the renewal application for Natgasoline LLC, Methanol Plant. An electronic copy of the Working Draft Permit (WDP) 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.

Please review the WDP and submit to me any comments you have on the working draft permit by **02/21/2025**. Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP. In addition, please provide the following requested information:

1. In regard to your most recent update, there are a few deficiencies I would like to identify on the UA Forms:

    a. On Form OP-UA2 Table 1a for 30 TAC Chapter 117 applicability, the SOP Index No. is missing for Unit IDs for H-EMG, H-FWP1, and H-FWP2. Previously you provided the SOP Index Nos. TAC117-01, TAC117-02, and TAC117-03, respectively. Please confirm these are the correct SOP Index Nos. The requirements are identified in the WDP.

    b. I requested Unit ID B-14001 SOP Index No. 63DDDDD-01 on Form OP-UA5 for MACT DDDDD applicability. This may have been in error. It may have been required on Form OP-UA6 as the unit was on the OP-UA6 for other rules.

I added the MACT DDDDD applicability based on what was provided from Form OP-UA5 to Form OP-UA6. Please confirm which UA Form Unit ID B-14001 should be on (OP-UA5 or OP-UA6). The requirements are identified in the WDP.

c. In your most recent update, Unit IDs B-01002FG, B-14001FG, and B-01001FG were provided on Form OP-UA1 for NSPS NNN and RRR. This is not required as the units are currently documented on the OP-UA17 (for NSPS NNN) and OP-UA48 (for NSPS RRR) with requirements that were manually built for compliance with Part 65. You may remove these units from OP-UA1 if you wish.

   You also provided Unit IDs B-01001 and B-14001 for MACT DDDDD applicability, but these units are documented on Form OP-UA5 and Form OP-UA6. They should be removed from Form OP-UA1. Please refer to comment 1.B. in this email. B-01001 is on Form OP-UA5 for the applicability listed in this permit. B-14001 is on the OP-UA6. Please confirm they are on the correct UA forms and provide any necessary updates.

2. There was a form update to Form OP-UA6 in December of 2024 for NSPS Db Tables 3a-3e. Code requirements were added for "Temporary Boiler" and "Additional Applicability Requirement". For Units B-01002 and B-14001, I have data interpreted the codes for these requirements as "NO" and "NONE" respectively. Their requirements are in the WDP. Please confirm the correct codes and provide an updated OP-UA6 for these units for NSPS Db applicability.

3. Please review the Compliance Schedules starting on page 56 of the WDP. Please provide necessary an updated Form OP-ACPS as needed. I used the OP-ACPS from the 10/24/2024 STEERS update.

   For some of the "List of Activites/Milestones to implement the Corrective Action Plan", the language provided was too long and I had to shorten it. Please refer to the Form OP-ACPS Form Instructions for completing this section and provide any necessary updates.

   For the Progress Report Submission Schedule, Section 7, please provide a date. As you can see it appears "empty" in the WDP. This date may change. If you have any questions, please let me know.

4. The Major NSR Summary Tables for NSR 107764/PSDTX1340 and GHGPSDTX54 are in the WDP. The NSR 107764/PSDTX1340 Major NSR Summary Table reflects changes provided on 10/24/2024. However, a Major NSR Summary Table was not provided for GHGPSDTX54. I have created a new one based on the 08/09/2024 issuance. Please review it and add the necessary information to the Monitoring and Testing, Recordkeeping, and Reporting Columns.

5. The Form OP-PBRSUP and Form OP-REQ1 Page 88 submitted on 01/16/2024 seem to be missing information from previous submittals. Please provide an updated Form OP-PBRSUP and Form OP-REQ1 Page 88 for PBR Information. This is important as Permit Term 15 references the submittal date of Form OP-PBRSUP, so all information should be included on one submittal/form. Please review the PBR Information in the WDP and ensure that Form OP-REQ1 Page 88, Form OP-PBRSUP, and the WDP New Source Review Authorization References and New Source Review Authorization References by Emissions Unit Tables have consistent information.

There may be units on Form OP-PBRSUP that are not documented in the Title V permit, however any unit or PBR that is documented in the Title V permit, in most cases, should also be documented on Form OP-PBRSUP and OP-REQ1 Page 88.

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. Prior to transmittal of the Public Notice/Announcement Authorization Package, 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 this requirement prior to sending the Public Notice/Announcement Authorization.

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 these updates have been submitted.

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,

John Walker
Permit Reviewer
OA/Air Permits Division/OP Section
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087
John.Walker@tceq.texas.gov

Phone: (512) 239-1277



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Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1
Texas Commission on Environmental Quality

Date: 10/23/2024	
Permit No.: O3963	
Regulated Entity No.: RN106586795	
Company Name: Natgasoline LLC	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA?	☒ YES ☐ NO
I. Application Type	
Indicate the type of application:	
☒ Renewal	
☐ Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
☐ Significant Revision	
☐ Revision Requesting Prior Approval	
☐ Administrative Revision	
☐ Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only	☒ YES ☐ NO
For GOP Revisions Only	☐ YES ☐ 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].)*						
☐ VOC	☒ NO_X	☐ SO_2	☐ PM_{10}	☒ CO	☐ Pb	☒ 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)?				☒ YES	☐ NO	☐ 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: 1/14/2025
Permit No.: O3963
Regulated Entity No.: RN106586795
Company Name: Natgasoline LLC

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	ADMIN-G	NO	B-01001, B-14001	OP-UA06 OP-UA01 OP-UA05	107764	AMOC for ammonia analyzer on stacks
2	SIG-C	NO	TK-03007	OP-UA3	107764	Natgasoline removed EPN No. TK-03007 in the renewal and modification to the NSR Permit 107764. The NSR permit was issued on August 9, 2024. TK-03007 is reclassified as a process vessel and throughput, fill rate, and hours of operation requirements have been removed.

3	SIG-C	NO	F-10001	NONE	107764	Under the Flare Design and Operations in the NSR, the Natgasoline permit removed the condition requiring the 1:4 ratio of supplemental gas to waste gas. The Methanol Flare is bound by SC.11.A, which references 40 CFR 60.18 and requires that the vent gas to the flare is maintained above the 200 BTU/scf for un-assisted flares. This 1:4 requirement significantly increases flare emissions. These increased emissions associated with combustion go against our MAERT limits, as well as requires reporting of these excessive emissions under various emission reporting requirements.
4	SIG-C	NO	D-04001	NONE	107764	During Methanol Plant shutdowns, the methanol storage tank emissions may be routed to a temporary VCU, in accordance with the Natgasoline Standard Permit 174371. The NSR permit authorized that the 13 gpm minimum scrubber flow requirement will not apply during this period. In addition, Natgasoline added this activity to the MSS Activity Summary Table - Attachment A in the NSR Permit.

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

Date: 10/23/2024		
Permit No.: O3963		
Regulated Entity No.: RN106586795		
Company Name: Natgasoline LLC		
I.	**Significant Revision** *(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)*	
A.	Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322?	☒ YES ☐ 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?	☐ YES ☒ NO

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

Using the table below, indicate the air pollutant(s) that will be changing and include a brief description of the change in pollutant emissions for each pollutant:

Pollutant	Description of the Change in Pollutant Emissions

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.
1/14/2025	O3963	RN106586795

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
D	2	TK-03007	OP-UA3	Slop Tank		107764	107764

Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR
Table 2

Date	Permit No.	Regulated Entity No.
2/21/2024	O3963	RN106586795

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.

Date:	1/14/2025
Permit No.:	O3963
RN No.:	106586795

For SOP applications, answer ALL questions unless otherwise directed.
♦ *For GOP applications, answer ONLY these questions unless otherwise directed.*

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	
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.	
PBR No.: 106.472	Version No./Date: 09/04/2000
PBR No.: 106.532	Version No./Date: 09/04/2000
PBR No.: 106.511	Version No./Date: 09/04/2000
PBR No.: 106.373	Version No./Date: 09/04/2000
PBR No.: 106.474	Version No./Date: 09/04/2000
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:
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:
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:

Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program

Table 1a: Additions

Date: 1/14/2025	**Regulated Entity No.: RN106586795**	**Permit No.: O3963**
Company Name: Natgasoline LLC	**Area Name: Methanol Plant**	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)

Applicable Requirements Summary
Form OP-REQ3 (Page 3)
Federal Operating Permit Program

Table 2a: Deletions

Date: 1/14/2025	**Regulated Entity No.: RN106586795**	**Permit No.: O3963**
Company Name: Natgasoline LLC	**Area Name: Methanol Plant**	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	TK-03007	OP-UA01		VOC MEOH		

Texas Commission on Environmental Quality
Miscellaneous Unit Attributes
Form OP-UA1 (Page 1)
Federal Operating Permit Program

Date:	**1/14/2025**
Permit No.:	**O3963**
Regulated Entity No.:	**RN106586795**

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
B-01002FG	60NNN-01	PRO	6/2018			Complying with 40 CFR 65, Consolidated Federal Air Rule in lieu of NSPS NNN.
B-01002FG	60RRR-01	PRO	6/2018			Complying with 40 CFR 65, Consolidated Federal Air Rule in lieu of NSPS RRR.
B-14001FG	60NNN-01	PRO	6/2018			Complying with 40 CFR 65, Consolidated Federal Air Rule in lieu of NSPS NNN.
B-14001FG	60RRR-01	PRO	6/2018			Complying with 40 CFR 65, Consolidated Federal Air Rule in lieu of NSPS RRR.
B-01001FG	60NNN-01	PRO	6/2018			Complying with 40 CFR 65, Consolidated Federal Air Rule in lieu of NSPS NNN.

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
B-01001FG	60RRR-01	PRO	6/2018			Complying with 40 CFR 65, Consolidated Federal Air Rule in lieu of NSPS RRR.
B-01001	63DDDDD-01	EU	6/2018			Subject to 40 CFR 63, DDDDD.
B-14001	63DDDDD-01	EU	6/2018			Subject to 40 CFR 63, DDDDD.

Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 1)
Federal Operating Permit Program
Table 1a: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)
Subchapter B: Combustion Control at Major Industrial, Commercial, and Institutional Sources in Ozone Nonattainment Areas
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/21/2024	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	Horsepower Rating	RACT Date Placed in Service	Functionally Identical Replacement	Type of Service	Fuel Fired	Engine Type	ESAD Date Placed in Service	Diesel HP Rating
H-EMG		**300+**	**FCD+**						
H-FWP1		**300+**	**FCD+**						
H-FWP2		**300+**	**FCD+**						

Stationary Reciprocating Internal Combustion Engine Attributes
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.
2/21/2024	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	HAP Source	Brake HP	Construction/ Reconstruction Date	Nonindustrial Emergency Engine	Service Type	Stationary RICE Type
H-EMG	**63ZZZZ**	**MAJOR**	**500+**	**06+**		**EMER-A**	
H-FWP1	**63ZZZZ**	**MAJOR**	**500+**	**06+**		**EMER-A**	
H-FWP2	**63ZZZZ**	**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.
1/14/2025	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	Applicability Date	Exemptions	Service	Commencing	Manufacture Date
H-EMG	**60IIII**	**2005+**	**NONE**	**EMERG**	**CON**	**0406+**
H-FWP1	**60IIII**	**2005+**	**NONE**	**FIRE**	**CON**	**0706+**
H-FWP2	**60IIII**	**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.
2/21/2024	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	Diesel	AES No.	Displacement	Generator Set	Model Year	Install Date
H-EMG	**60IIII**	**DIESEL**		**10-**		**2014**	
H-FWP1	**60IIII**	**DIESEL**		**10-**		**2014**	
H-FWP2	**60IIII**	**DIESEL**		**10-**		**2014**	

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.
1/14/2025	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	Kilowatts	Filter	AECD	Standard	Compliance Option	PM Compliance	Options
H-EMG	**60IIII**	**E560-2237**		**YES**	**YES**	**MANU YES**		
H-FWP1	**60IIII**	**F560+**			**YES**	**MANU YES**		
H-FWP2	**60IIII**	**F560+**			**YES**	**MANU YES**		

Process Heater/Furnace Attributes
Form OP-UA5 (Page 1)
Federal Operating Permit Program
Table 1a: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)
Subchapter B: Combustion Control at Major Industrial, Commercial, and Institutional Sources in Ozone Nonattainment Areas, Process Heaters
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/21/2024	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	Unit Type	Maximum Rated Capacity	RACT Date Placed in Service	Functionally Identical Replacement	Fuel Type(s)			Annual Heat Input	NOx Emission Limitation	Opt-In Unit	23C-Option
B-01001	R7103	PRHTR	200+	FCD+								

Process Heater/Furnace Attributes
Form OP-UA5 (Page 10)
Federal Operating Permit Program
Table 6a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subchapter DDDDD: Industrial, Commercial, and Institutional Process Heaters
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
1/14/2025	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	Commence	Table Applicability	HCl Emission	HCl-CMS
B-01001	63DDDDD	NEW	T3.1TS		
B-14001	63DDDDD-01	NEW	T3.1TS		

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 1)
Federal Operating Permit Program
Table 1a: Title 30 Texas Administrative Code Chapter 111 (30 TAC Chapter 111)
Subchapter A: Visible Emissions
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/21/2024	O3963	RN106586795

Emission Point ID No.	SOP/GOP Index No.	Alternate Opacity Limitation	AOL ID No.	Vent Source	Opacity Monitoring System	Construction Date	Effluent Flow Rate
B-01002SK	R111	NO		OTHER	NONE	72+	100+
B-14001SK	R111	NO		OTHER	NONE	72+	100+

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.
2/21/2024	O3963	RN106586795

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
B-01001FG	R5120	NO	NO	DISTOPHER				
B-01002FG	R5120	NO	NO	DISTOPHER				
B-14001FG	R5120	NO	NO	DISTOPHER				
S-10001VT	R5120	NO	NO	REGVAPPL				

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.
2/21/2024	O3963	RN106586795

Emission Point ID No.	SOP Index No.	Alternate Control Requirement	ACR ID No.	Control Device Type	Control Device ID No.
B-01001FG	R5120	NONE		OTHER	B-01001
B-01002FG	R5120	NONE		OTHER	B-01002
B-14001FG	R5120	NONE		OTHER	B-14001
S-10001VT	R5120	NONE		FLARE	S-10001

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 5)
Federal Operating Permit Program
Table 2c: 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.
2/21/2024	O3963	RN106586795

Emission Point ID No.	SOP Index No.	Total Design Capacity	Flow Rate/Concentration	40 CFR Part 60, Subpart NNN Requirements	40 CFR Part 60, Subpart RRR Requirements
B-01001FG	R5120	1100+	500+	NO	NO
B-01002FG	R5120	1100+	500+	NO	NO
B-14001FG	R5120	1100+	500+	NO	NO

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 13)
Federal Operating Permit Program
Table 6a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart G: National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/21/2024	O3963	RN106586795

Emission Point ID No.	SOP Index No.	Overlap	Group 1	Regulation	HAP Concentration	Flow Rate	Electing Control	NSPS TRE Index Value	MACT TRE Index Value	Plant Type
S-10001VT	63G	NNN	YES							

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 14)
Federal Operating Permit Program
Table 6b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart G: National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
1/14/2025	O3963	RN106586795

Emission Point ID No.	SOP Index No.	Control Device	Control Device ID No.	Halogenated	TRE for Halogenated Vent Stream	Halogen Reduction Device	Installation Date	Performance Test
S-10001VT	63G	FLARE	S-10001	NO				NO

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 15)
Federal Operating Permit Program
Table 6c: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart G: National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/21/2024	O3963	RN106586795

Emission Point ID No.	SOP Index No.	Alternate Monitoring Parameters (AMP)	AMP ID No.	Continuous Monitoring	Continuous Monitoring Alt ID No.	Bypass Lines	Flow Indicator
S-10001VT	63G	NO		NOALT		NO	

Texas Commission on Environmental Quality
Distillation Unit Attributes
Form OP-UA17 (Page 1)
Federal Operating Permit Program
Table 1a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart NNN: Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations

Date:	**2/21/2024**
Permit No.:	**O3963**
Regulated Entity No.:	**RN106586795**

Unit ID No.	SOP Index No.	Subpart NNN Chemicals	Construction/Modification Date	Vent Type	Distillation Unit Type	Total Design Capacity	Vent Stream Flow Rate
B-01001FG	65-1NNN	YES	83+	2+VRS	NONE	1+	8+
B-01002FG	65-2NNN	YES	83+	2+VRS	NONE	1+	8+
B-14001FG	65-3NNN	YES	83+	2+VRS	NONE	1+	8+

Texas Commission on Environmental Quality
Distillation Unit Attributes
Form OP-UA17 (Page 2)
Federal Operating Permit Program
Table 1b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart NNN: Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations

Date:	**1/14/2025**
Permit No.:	**O3963**
Regulated Entity No.:	**RN106586795**

Unit ID No.	SOP Index No.	Total Resource Effectiveness	TOC Reduction	Subpart NNN Control Device	ACT ID No.	Subpart NNN Control Device ID No.	Emission Point ID No(s).		Organic Monitoring Device
B-01001FG	65-1NNN	8-B	YES	BPH44+	*	B-01001	*	*	*
B-01002FG	65-2NNN	8-B	YES	BPH44+	*	B-01001	*	*	*
B-14001FG	65-3NNN	8-B	YES	BPH44+	*	B-01001	*	*	*

Texas Commission on Environmental Quality
Reactor Attributes
Form OP-UA48 (Page 3)
Federal Operating Permit Program

Table 2a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60) Subpart RRR: Standards of Performance for Volatile Organic Compound Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes

Date:	**1/14/2025**
Permit No.:	**O3963**
Regulated Entity No.:	**RN106586795**

Unit ID No.	SOP Index No.	Chemicals Listed In § 60.707	Construction/ Modification Date	Affected Facility Type	Subject To Title 40 CFR Part 60, Subpart DDD	Subject To Title 40 CFR Part 60, Subpart NNN	TRE Index Value	TRE for Halogenated Vent Stream
B-01001FG	65-1RRR	YES	90+	COMBO	NO	NO	8+	NO
B-01002FG	65-2RRR	YES	90+	COMBO	NO	NO	8+	NO
B-14001FG	65-3RRR	YES	90+	COMBO	NO	NO	8+	NO

Texas Commission on Environmental Quality
Reactor Attributes
Form OP-UA48 (Page 4)
Federal Operating Permit Program

Table 2b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart RRR: Standards of Performance for Volatile Organic Compound Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes

Date:	**1/14/2025**
Permit No.:	**O3963**
Regulated Entity No.:	**RN106586795**

Unit ID No.	SOP Index No.	Total Design Capacity	Vent Stream Flow Rate	TOC Exemption	Control Device	Control Device ID No.
B-01001FG	65-1RRR	1+	11+	NOEX	B44+	B-01001
B-01002FG	65-2RRR	1+	11+	NOEX	B44+	B-01001
B-14001FG	65-3RRR	1+	11+	NOEX	B44+	B-01001

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
1/14/2025	O3963	RN106586795

Unit ID No.	Registration No.	PBR No.	Registration Date

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
1/14/2025	O3963	RN106586795

Unit ID No.	PBR No.	Version No./Date
F-07501	106.472	09/04/2000
P-12002A/P-12002B	106.472	09/04/2000
F-09008	106.532	09/04/2000
P-5601 A/B	106.511	09/04/2000
C-0401	106.373	09/04/2000
F-0910	106.474	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
1/14/2025	O3963	RN106586795

PBR No.	Version No./Date

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
1/14/2025	O3963	RN106586795

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
F-07501	106.472	09/04/2000	Track annual gallons of diesel usage.
P-12002A/B	106.472	09/04/2000	Track annual operating hours.
F-09008 Unit 900	106.532	09/04/2000	Record gallons of throughput.
P-5601 A/B	106.511	09/04/2000	Track annual operating hours.
C-0401	106.373	09/04/2000	The use of R-507A refrigerant requires a EPA-608 certified technician.
F-0910	106.474	09/04/2000	Document percent sulfuric acid composition.

Natgasoline's new Beaumont facility includes a 5,500-metric ton per day methanol production unit that synthesizes refined methanol using natural gas feedstock and water.

Natural Gas Feed Processing
Sweet, pipeline-quality natural gas is supplied to the methanol plant via pipeline to a natural gas compressor. A portion of the natural gas received by the site is diverted for fuel in combustion units. The majority of the natural gas is processed as feed for the methanol process unit

Methanol plant Reforming
The natural gas from the feed processing systems described above is mixed with steam and process recycle gas streams from the downstream methanol synthesis system. The mixture is fed to a pre-reformer reactor with a catalyst bed that converts most of the higher molecular weight hydrocarbons into methane (CH4), hydrogen (H2), and carbon monoxide (CO). The pre-reformer is an enclosed process vessel without any normal emissions except for potential fugitive equipment leaks. The gas mixture from the pre-reformer (i.e., "pre-reformed" gas) is converted to synthesis gas by combined reforming, which is performed with a combination of steam reforming and auto-thermal reforming.

Reformer
Most of the pre-reformed gas mixture is fed to the reformer. The reformer can be described as a gas-fired combustion unit integrated with a chemical reactor. As a combustion unit (EU "B-01001"), the reformer system is designed to fire up to 1,552 MMBtu/hour total of fuel gas, which consists of natural gas and process waste gas. The combustion exhaust is heated using a natural gas-fired auxiliary burner (EU "B 01002") before being further processed for steam generation and other heat recovery steps. The combined reformer furnace and auxiliary burner exhaust gases are routed to a selective catalytic reduction (SCR) system to reduce NOx emissions prior to exhausting to atmosphere

The chemical reaction process is entirely enclosed within the steam reformer system, and there are no associated chemical waste gas steams during normal operation, except for potential fugitive equipment leaks. The steam reformer process effluent contains hydrogen, carbon monoxide, carbon dioxide, unconverted steam, and other gases that are fed to the auto-thermal reformer (ATR) as discussed below.

Auto-thermal Reformer (ATR)
A portion of the pre-reformed gas mixture is bypassed around the steam reformer and mixed with steam reformer effluent. This mixture is fed to the ATR, along with a stream of pure oxygen, as a secondary catalyst-based reforming step. The ATR reaction section is an enclosed process without generating waste gases or any air pollutant emissions except for potential fugitive equipment leaks.

The ATR effluent is called "synthesis gas" and consists of hydrogen, carbon monoxide, carbon dioxide, and other gases at precisely controlled concentrations. The synthesis gas is cooled in heat recovery/steam generation processes and then compressed for downstream synthesis. The synthesis gas compression section produces a small and continuous process waste gas stream from the compressor seal system (EU "S-10001 VT "), which is routed to the process flare.

Methanol Synthesis
Synthesis gas from the above-described ATR is mixed with additional hydrogen and synthesis recycle gas. This mixture is fed to the methanol synthesis process. The methanol synthesis reactions are exothermic and take place in two parallel water-cooled methanol reactors followed by a gas-cooled methanol reactor containing a catalyst matrix.

The resulting crude methanol liquid is separated from the recycle gas and routed to the methanol distillation unit. The separated crude methanol liquid includes water, liquid impurities, and dissolved gases that are removed in downstream distillation operations. The separated recycle gas is returned to the synthesis reactors for additional conversion to methanol. A small portion is purged and routed to the fuel gas system to maintain the inert gas level.
During startup of the entire methanol plant, synthesis gas (EU "S-10001 VT") that is normally fed to the methanol synthesis process is routed to the process flare for a limited duration. With the exception of this

startup operation, the methanol synthesis process is an enclosed process that does not generate any waste gases or air pollutant emissions during normal operation, except for potential fugitive equipment leaks.

Methanol Distillation
The methanol distillation process separates the methanol from the following key impurities: water, dissolved gases, and other compounds. The crude methanol is purified and partially vaporized in a three-column system. First, the pre-run column removes low boiling by-products and dissolved gases; these gaseous overheads are routed to the fuel gas system. Next, the pressure column removes water and other higher boiling compounds from the pre-run column effluent. The overheads from the pressure column are product quality methanol and also re-boil the atmospheric column. Finally, the atmospheric column removes the methanol product out of the pressure column bottoms by cooling the hot vapor methanol from the top of the pressure column.

During startup of the entire methanol plant, certain distillation process gas streams (EU “S-10001 VT”) that are normally routed into the reformer fuel gas system are instead routed to flare for a short duration while the reformer fuel gas composition is slowly adjusted. With the exception of this startup operation, the methanol distillation process is an enclosed process that does not generate any waste gases or air pollutant emissions during normal operation, except for potential fugitive equipment leaks.

Storage and Product Loading
Intermediate methanol product from the methanol plant is stored in the onsite methanol storage tank farm before delivery to customers. The onsite tank farm includes one crude methanol tank (EU "TK-04001") and two methanol "shift" tanks (EUs "TK-04002A/B”). These methanol tanks are all vertical fixed roof tanks with nitrogen blanketing. The methanol storage tank vent lines are routed to a water scrubber (EU "D-04001"), where the methanol vapors from the tank vent gases are removed.

Supporting Operations
Utility and support operations include a fuel gas system, auxiliary boiler, cooling water system, process flare, air separation unit, and emergency engines for firewater pumps and site generator.

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Toby Baker, *Executive Director*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 21, 2022

MR MIGUEL MARTINEZ
ENVIRONMENTAL MANAGER
NATGASOLINE LLC
PO BOX 20339
BEAUMONT TX 77720-0339

Re: Alternative Method of Compliance (AMOC) No. 215
Reformer and Auxiliary Boiler at Methanol Plant
Alternative Ammonia Monitoring
Regulated Entity Number: RN106586795
Customer Reference Number: CN604256412
Associated Permit Numbers: 107764, PSDTX1340, and O3963

Dear Mr. Martinez:

This correspondence is in response to Natgasoline LLC's August 4, 2022 request for an alternative ammonia (NH_3) monitoring method for compliance with 30 Texas Administrative Code (TAC) Chapter 117 NH_3 compliance requirements, which include specifications on NH_3 analysis methods in § 117.8130.

We understand that Natgasoline is requesting to use a different analyzer method to demonstrate compliance for the Reformer (EPN B-01001) and Auxiliary Boiler (B-14001) which are each equipped with selective catalytic reduction (SCR) to control NO_x emissions and resulting in collateral NH_3 "slip" emissions. We understand that you propose to use a Tunable Diode Laser (TDL) Ammonia analyzer (SICK, Inc., Model GM700) which is expected to have increased measurement accuracy, faster response times, and minimal maintenance.

The Texas Commission on Environmental Quality (TCEQ) Executive Director has made a final decision to approve your AMOC request. The TCEQ has been delegated authority to enforce the above cited standards and is authorized to approve this AMOC. You are reminded that approval of any AMOC shall not abrogate the Executive Director or Administrator's authority under the Act or in any way prohibit later canceling the AMOC. By copy of this letter, we are informing the Environmental Protection Agency, Region 6, of this decision as required by TCEQ's delegation of authority.

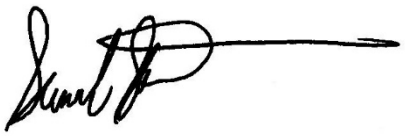
This AMOC approval may supersede certain requirements or representations in Permit Nos. 107764 and PSDTX1340. To ensure effective and consistent enforceability, we understand that Nasgasoline will incorporate this AMOC into the pending permit amendment application (Project No. 343112).

This approval may also change applicable requirements for the site, which are identified in the site operating permit (SOP) O3963. The TCEQ recommends the submittal of a SOP administrative revision if any changes are necessary. Changes meeting the criteria for an administrative revision can be operated before issuance of the revision if a complete application is submitted to the TCEQ and this information is maintained with the SOP records at the site.

Re: Permit Numbers: 107764, PSDTX1340, and O3963

If you need further information or have any questions, please contact Ms. Anne Inman, P.E. at (512) 239-1276 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,



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

cc: Sarah, , Compliance Strategies & Solutions Inc, Houston
Air Section Manager, Region 10 - Beaumont
Jesse E. Chacon, P.E., Manager, Operating Permits Section, Air Permits Division, OA: MC-163
Christopher J. Loughran, P.E., Manager, Energy New Source Review Permits Section, Air Permits Division, OA: MC-163
Air Permits Section Chief, New Source Review Section (6PD-R), U.S. Environmental Protection Agency, Region 6, Dallas

Project Number: 345948

Texas Commission on Environmental Quality

Title V Existing

3963

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	NATGASOLINE METHANOL PLANT
Does the site have a physical address?	No
Because there is no physical address, describe how to locate this site:	2366 Sulphur Plant Road
City	Beaumont
State	TX
ZIP	77705
County	JEFFERSON
Latitude (N) (##.######)	30.012222
Longitude (W) (-###.######)	94.036388
Primary SIC Code	2869
Secondary SIC Code	
Primary NAICS Code	325199
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN106586795
What is the name of the Regulated Entity (RE)?	BEAUMONT GAS TO GASOLINE PLANT
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	2366 SULPHUR PLANT RD
City	BEAUMONT
State	TX
ZIP	77705
County	JEFFERSON
Latitude (N) (##.######)	30.03143
Longitude (W) (-###.######)	-94.05388
Facility NAICS Code	
What is the primary business of this entity?	CHEMICAL MANUFACTURING

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN604256412
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Natgasoline LLC
Texas SOS Filing Number	801689918
Federal Tax ID	680682889
State Franchise Tax ID	32049571162
State Sales Tax ID	

Local Tax ID	
DUNS Number	79934278
Number of Employees	101-250
Independently Owned and Operated?	No

Responsible Official Contact

Person TCEQ should contact for questions about this application:	
Organization Name	NATGASOLINE LLC
Prefix	MR
First	LARRY
Middle	
Last	RICHARD
Suffix	
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)	PO BOX 20339
Routing (such as Mail Code, Dept., or Attn:)	
City	BEAUMONT
State	TX
ZIP	77720
Phone (###-###-####)	4093444900
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	larry.richard@natgasoline.com

Technical Contact

Person TCEQ should contact for questions about this application:	
Select existing TC contact or enter a new contact.	MIGUEL MARTINEZ(NATGASOLINE LLC...)
Organization Name	NATGASOLINE LLC
Prefix	MR
First	MIGUEL
Middle	
Last	MARTINEZ
Suffix	
Credentials	
Title	ENVIRONMENTAL MANAGER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 20339

Routing (such as Mail Code, Dept., or Attn:)	
City	BEAUMONT
State	TX
ZIP	77720
Phone (###-###-####)	4093444974
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	miguel.martinez@natgasoline.com

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	30 Deg 0 Min 44 Sec
3) Permit Longitude Coordinate:	94 Deg 2 Min 11 Sec
4) Is this submittal a new application or an update to an existing application?	Update
4.1. Select the permit/project number for which this update should be applied.	3963-36358
5) 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)

[File Properties]

File Name	OP_2_Form OP-2 (1.14.25).pdf
Hash	1EBC69D415FA50F58CFA66CBDB12A245F23A2394CC2AF668CB1767CD9C9E0A10
MIME-Type	application/pdf

Attach OP-ACPS (Application Compliance Plan and Schedule)

Attach OP-REQ1 (Application Area-Wide Applicability Determinations and General Information)

[File Properties]

File Name	OP_REQ1_Form OP-REQ1 Page 88 (1.14.25).pdf
Hash	AF19603AB0FBA25403AA27EC3728F58836F828BA6EF2197C46EED9E359D87173
MIME-Type	application/pdf

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

[File Properties]

File Name	OP_REQ3_Form OP-REQ3 (1.14.25).pdf
Hash	321FF5B0273F60460500C547A249870236545F7CC364F8D1508BF25652E4CC72

MIME-Type	application/pdf

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

[File Properties]	
File Name	OP_PBRSUP_Form OP-PBRSUP (1.14.25).pdf
Hash	55D6EC55CC2A08B6D01D84EC8879D1383E88FFBC2B836BCB53057171AE14EE88
MIME-Type	application/pdf

Attach OP-SUMR (Individual Unit Summary for Revisions)

[File Properties]	
File Name	OP_SUMR_Form OP-SUMR (1.14.25).pdf
Hash	57DF5D707E5C181FD9D5C4CC5D9BB870E4E52A9D7D401771D922670938982D48
MIME-Type	application/pdf

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

[File Properties]	
File Name	Form OP-UA1 (1.14.2025).pdf
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MIME-Type	application/pdf
[File Properties]	
File Name	Form OP-UA15 (1.14.25).pdf
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[File Properties]	
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MIME-Type	application/pdf
[File Properties]	
File Name	Form OP-UA2 (1.14.25).pdf
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MIME-Type	application/pdf
[File Properties]	
File Name	Form OP-UA5 (1.14.25).pdf
Hash	FA614A5498901338907431EA34A015042E9AA219B20309282188F3B257C2135B

MIME-Type	application/pdf

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 Void Request Form

Attach any other necessary information needed to complete the permit.

[File Properties]	
File Name	AMOC215_345948_Approval_6270457.pdf
Hash	3F4EBF115631BCD0E17160686D76586F72D689749C9C7D025001587D28601C7F
MIME-Type	application/pdf
[File Properties]	
File Name	Process description_FOP O3963_From Project 26047 (Revised 12.19.24).pdf
Hash	A83200938DEFF1813639FFCF4CA483FC86AE1C1273B2CBD6ACA03671341837E5
MIME-Type	application/pdf

An additional space to attach any other necessary information needed to complete the permit.

Certification

I certify that I am the Responsible Official 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 Larry Richard, the owner of the STEERS account ER103291.
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 enforcemer 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 3963.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEC

OWNER OPERATOR Signature: Larry Richard OWNER OPERATOR

Account Number:	ER103291
Signature IP Address:	38.140.215.210
Signature Date:	2025-01-16
Signature Hash:	85B1218A1685B74C1CF677E0344928F6F6782E4E9428C83BA571E980E1FC09D5
Form Hash Code at time of Signature:	76AAEA1B4AFDB1DE512C0EF305ED64632ADD9F6F0F92579EC9E0D6F37144C5CC

Submission

Reference Number:	The application reference number is 746137
Submitted by:	The application was submitted by ER103291/Larry Richard
Submitted Timestamp:	The application was submitted on 2025-01-16 at 14:57:26 CST
Submitted From:	The application was submitted from IP address 38.140.215.210
Confirmation Number:	The confirmation number is 619720
Steers Version:	The STEERS version is 6.85
Permit Number:	The permit number is 3963

Additional Information

Application Creator: This account was created by Charles M Munley JR

From: David Lemoine <dlemoine@compliance-sg.com>
Sent: Monday, January 13, 2025 9:29 AM
To: John Walker
Cc: Jordan Hollier; Marty Munley
Subject: RE: Technical Review - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant

Categories: Red Category

Good morning,

I believe we have gone through all your comments on the Natgasoline Title V application. In this regard, I was hoping we could have a quick Teams meeting this week to step through our changes to make sure everything as been addressed. Please let us know if you have availability today or tomorrow?

Thank you and I hope you guys had a good Christmas and New Year.

David C. Lemoine
Compliance Solutions Group

From: John Walker
Sent: Wednesday, December 18, 2024 5:14 PM
To: Miguel Martinez
Cc: Philip Curwick; Dlemoine@compliance-sg.com; Jordan Hollier; mmunley@compliance-sg.com; Jason Burnett
Subject: RE: Technical Review - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant

Good Afternoon,

I have reviewed the application and application updates for Project 36358. Additional information is required to resolve deficiencies found in the application. Please provide the requested information below as soon as possible but no later than **01/17/2025:**

1. Please provide an updated process description for my technical review that is 1 ½ pages max. I have attached the previous process description on file. Please make any necessary updates.

2. Please provided the following UA forms and requested information:

    a. Form OP-UA2:
        i. Table 5a for NSPS IIII applicability, for Unit IDs H-FWP1 and H-FWP2, the manufacture date code "0406+" was provided but is not valid for units with the "FIRE" code for service. The code for manufacture date should be "0706- or 0706+" per the Form OP-UA2 Form Instructions. Please confirm the correct code.
        ii. Table 5c for NSPS IIII applicability, for Unit ID H-EMG, a code is required for AECD.

    b. Form OP-UA5:
        i. Form OP-UA5 has been updated for MACT DDDDD applicability. Please provide Unit IDs B-01001 SOP Index No. 63DDDDD and B-14001 SOP Index No. 63DDDDD-01 on Form OP-UA5 for MACT DDDDD.

    c. Form OP-UA15:
        i. Page 14 for MACT G applicability, for Unit ID S-10001VT, the code for performance test is missing. The code "YES" was provided in a previous project. Please confirm the correct code.

    d. Form OP-UA17:
        i. Table 1b for NSPS NNN applicability, for all units provided, the codes "YES", "BPH44+", and "B-01001" were provided for TOC Reduction, Subpart NNN Control Device, and Subpart NNN Control Device ID. No., respectively. However on the provided form asterisks were provided. Please confirm the correct codes.

    e. Form OP-UA41:

i. Table 1a for NSPS RRR applicability, for Unit IDs B-01001FG, B-01002FG, B-14001FG, the code "9-" was provided for TRE Index Value. "9-" is not a valid code. In the previous application, the code "8+" was provided. Please confirm the correct code.
ii. Table 2b for the same units listed above, Control Device Code was "B44+" and Control Device ID No. was "B-01001" but asterisks were provided in this application. Please confirm the correct codes.

3. Please provide an updated Form OP-2 addressing the following revisions:

    a. Please clarify your intent on revision items 1 and 2. These units were added to the OP-UA1 but no applicable requirements outside of their preconstruction authorization (PCA) were provided on Form OP-REQ3. Are the units subject to Title V requirements that should be identified on any UA forms, OP-REQ2, or OP-REQ3, or do the units only have requirements under their preconstruction authorization? I feel if the units only have requirements from the preconstruction authorization, these units should be removed from Forms OP-2, OP-UA1, and OP-REQ3, since their requirements will be incorporated by reference as their PCA is identified in the site-wide preconstruction authorizations. Or if you choose to keep these revisions on OP-2, perhaps stating that the units were added to the NSR PCA and have no Title V requirements may be appropriate. Please clarify your intent with these revision items.

    b. Please clarify your intent on revision 3. The description of the revision is that there is an AMOC for the ammonia analyzer on the stacks however on Form OP-REQ3 you have requested to remove the ammonia requirement. I do not believe this is correct. I do not believe the ammonia requirement is being removed from the units via an AMOC. I believe the units should be removed from OP-REQ3. Also, please provide a copy of the AMOC.

    c. In regard to revisions 5 and 6, we feel it can be appropriate to list revisions that may have occurred within a preconstruction authorization. These units are currently not identified in the Title V project and it is confusing that the units are being requested to be deleted on Form OP-SUMR. I believe the "D" code should be removed from the units on Form OP-SUMR since they are not being removed from the site per the descriptions of the revisions on Form OP-2, and they should also probably be removed from Form OP-SUMR since they are not documented within the Title V permit.

        Also note, I do not believe that information provided on OP-REQ3, for any of the revisions mentioned above, is properly filled out for reasons identified above. I believe the only entry on Form OP-REQ3 that should remain is revision item 4 for Unit ID TK-03007, which is being removed from the permit due to being reclassified as a process vessel. Currently the unit is on OP-UA3, and I believe the citations in the effective permit's applicable requirement summary table should be provided on Tables 2a and 2b since they are being removed.

4. Form OP-ACPS - In the application submittal on Form OP-ACPS, 23 units were provided with compliance schedules that were dependent on incorporating a revision to NSR 107764 and GHGPSDTX54. On 08/09/2024 an amendment to NSR 107764 and GHGPSDTX54 was issued. On 10/24/2024 an update was provided to the application with an updated OP-ACPS with 4 units having a compliance schedule (along with the updated issuance date for the NSR/GHG permits on Form OP-REQ1 page 87 as required). Please confirm if the initial 23 compliance schedules are no longer required due to the incorporation the 08/09/2024 amendment to NSR 107764 and GHGPSDTX54 and if only the 4 submitted on the 10/24/2024 update to Form OP-ACPS are required.

5. Please provide an updated Form OP-PBRSUP. It's important that all the PBR information between the Title V permit, Forms OP-2, OP-SUMR, and OP-REQ1 Page 88, and Form OP-PBRSUP are consistent. Please amend the following issues:

    a. Since this is the first time that Form OP-PBRSUP is being submitted for the permit, please provide Form OP-PBRSUP in full (Tables A-D). If there is no information to provide on any table, its acceptable to have a blank table.
    b. Unit IDs should be provided on Tables B and D. Several units in the Title V permit are authorized by PBRs that are not identified on Form OP-PBRSUP tables A or B and D. They should be included on Form OP-PBRSUP. Any PBRs listed in the site-wide new source review authorization references table (determined by Form OP-REQ1 pages 87 and 88) should be documented on Form OP-PBRSUP. Also, in most cases, any PBRs provided on Form OP-PBRSUP should be identified on Form OP-REQ1 Page 88 and if the unit is in the Title V permit, on Form OP-SUMR as a the preconstruction authorization. Please note, there may be units identified on Form OP-PBRSUP Tables B and D, that do not have Title V requirements and are not identified on Form OP-SUMR, and that is perfectly acceptable.

        Form OP-PBRSUP is a supplemental table that is included in the Permit File. It is not necessarily a Title V Form. Any PBRs that are to be added to the Title V permit must be provided on Forms OP-2, OP-SUMR, and OP-REQ1 Page 88.
    c. PBRs 106.454/11/01/2001 and 106.478/09/04/2000 were provided on Form OP-PBRSUP Table B and D but not on OP-REQ1 Page 88. 106.471/09/04/2000 was also provided and not documented on Form OP-REQ1 Page 88 but it is not required to be listed on Form OP-REQ1 Page 88. This PBR entry may be better served on Table C of Form OP-PBRSUP. Please updated Form OP-REQ1 as necessary.
    d. Reporting requirements N/A were provided for each entry on Table D. Per the Form OP-PBRSUP instructions on page 4, please provide the monitoring and/or recordkeeping requirements used to demonstrate compliance with the applicable PBR conditions, general requirements of 30 TAC §106.4 or general requirements (if any) in effect at the time of the claim, and any certified registration of emission limits as applicable for the emission units. The specificity of the monitoring and/or recordkeeping requirements is required to be consistent with the Periodic Monitoring Guidance. Please see the OP-PBRSUP Page 4 instructions for Monitoring Requirement for additional information.

6. The following question was provided to me by Mr. Curwick on 11/12/2024:

   I have a question concerning the burner / flame inspection and tuneup requirements for the reformer furnace required by 40 CFR Part 63 Subpart DDDDD (40 CFR 63.7540(a)(10)) at the Natgasoline Methanol Plant located in Beaumont Texas. They have a large reformer 1552 MMbtu/hr and set of auxiliary burners in the vent downstream of the reformer (for additional heating of the vent gas for steam production).

   The question came up from Natgasoline operations asking whether the Auxiliary Burners in the vent downstream from the Reformer Furnace vent should be included in the burner and flame tuneup and inspection under the federal rule. Basically, we are asking where the point of compliance would be to optimize flame pattern, CO emissions, etc. In this situation: would Natgas include just the reformer burners inside the reformer furnace when complying with Subpart DDDDD or include the auxiliary burners in the vent downstream of the reformer?

   I reached out to my technical specialist and she gave the following answer:

   Since the reformer furnace (Unit ID B-01001) is the unit that is actually subject to MACT DDDDD, that is the unit that needs to have the burner/flame inspection and tune-up described in 63.7540(a)(10). Based on my understanding of the process description, the combustion exhaust from B-01001 and the combustion exhaust from the auxiliary burners downstream does get combined before its eventual exit to the atmosphere, so it is true that including the auxiliary burners in the tune-up actions would help optimize combustion and minimize CO emissions from that overall area of the process and the combined emission point. However, MACT DDDDD is only regulating B-01001 so the emissions from that unit are what must meet any applicable limits in MACT DDDDD, and the burners that are part of that unit are what need to be examined during the tune-up. In general, just because other combustion units affect the exhaust gas downstream does not mean that those devices are part of the unit subject to MACT DDDDD.

   One additional consideration: if the auxiliary burners would themselves meet either the process heater or boiler definition from MACT DDDDD, then they would need their own MACT DDDDD requirements and would have their own tune-up under that rule.

   I believe based on the data in our database (and updates for MACT DDDDD I have requested), this will lead to Chapter 117 and MACT DDDDD applicability for B-01001 and Chapter 117 and NSPS Db applicability for B-01002. B-01001 and B-01002 may have the same emission point in the NSR permit, but the regulations we are including in the permit regulate the emission sources, so applicability must be evaluated separately. Please confirm if B-01002 is one combustion device or multiple. If it is multiple devices, then I believe they should be documented individually (they can be grouped if desired). I wasn't sure since it is just a single unit ID but you have mentioned auxiliary burners, plural.

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 these updates have been submitted.

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,

John Walker
Permit Reviewer
OA/Air Permits Division/OP Section
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087
John.Walker@tceq.texas.gov

Phone: (512) 239-1277



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Philip Curwick <pcurwick@compliance-sg.com>
Sent: Tuesday, November 12, 2024 11:13 AM
To: John Walker
Subject: Federal Permit Compliance with 40 CFR Part 63 Subpart DDDDD (40 CFR 63.7540(a)(10)

John,

I have a question concerning the burner / flame inspection and tuneup requirements for the reformer furnace required by 40 CFR Part 63 Subpart DDDDD (40 CFR 63.7540(a)(10)) at the Natgasoline Methanol Plant located in Beaumont Texas. They have a large reformer 1552 MMbtu/hr and set of auxiliary burners in the vent downstream of the reformer (for additional heating of the vent gas for steam production).

The question came up from Natgasoline operations asking whether the Auxiliary Burners in the vent downstream from the Reformer Furnace vent should be included in the burner and flame tuneup and inspection under the federal rule. Basically, we are asking where the point of compliance would be to optimize flame pattern, CO emissions, etc. In this situation: would Natgas include just the reformer burners inside the reformer furnace when complying with Subpart DDDDD or include the auxiliary burners in the vent downstream of the reformer?

Thanks for any help.

Philip Curwick
Compliance Solutions Group
225-754-0405 Office
225-620-3075 Cell

Federal Operating Permit
Renewal Application



Natgasoline LLC

Beaumont Methanol plant

October 2024

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APPENDIX E – APPLICABILITY AND REQUIREMENTS FORMS

LIST OF ABBREVIATIONS

Abbreviation	Term/Phrase/Name
ACFM	Actual Cubic Feet per Minute
ASU	Air Separation Unit
ATR	Auto-thermal Reformer
bpd	Barrel per day
CO	Carbon Monoxide
CH_4	Methane
CAM	Compliance Assurance Monitoring
CAR	Consolidated Federal Air Rule
EU	Emission Unit
FIN	Facility Identification Number
GHG	Green House Gas
HAP	Hazardous Air Pollutant
H_2	Hydrogen
MSS	Maintenance, startup, and shutdown
MtG	Methanol-to-Gasoline
Natgasoline	Natgasoline LLC
NSR	New Source Review
PSD	Prevention of Significant Deterioration
SCR	Selective Catalytic Reduction
TAC	Texas Administrative Code
TCEQ	Texas Commission on Environmental Quality

1. INTRODUCTION

Natgasoline LLC (Natgasoline) is applying to the Texas Commission on Environmental Quality (TCEQ) for the renewal of its Federal Operating Permit (FOP) Number O3963, which is also known as a "Title V" operating permit. The renewal of the FOP is being submitted in accordance with Title 30 of the Texas Administrative Code (30 TAC) § 122.241. Natgasoline has also included several revisions to the initial FOP issued in 2019.

The Natgasoline Methanol Plant is located near the city of Beaumont, Jefferson County, Texas. The plant produces methanol from natural gas and water. The plant has been in operation since 2018. Note that the original air permit for this facility included an additional plant process to convert the methanol into motor vehicle gasoline (MtG) and other hydrocarbon products. However, the MtG facility was never constructed, and all references to this process have been removed/excluded from this permit renewal application.

The initial FOP for the Natgasoline Methanol Plant was issued on August 21, 2019, and expires five years from this date. Other active permits for this facility include New Source Review (NSR) and Prevention of Significant Deterioration (PSD) permit numbers 107764 and PSDTX1340, and Green House Gas (GHG) emissions under a separate PSD permit, which is identified as permit number GHGPSDTX54. The TCEQ has assigned Regulated Entity Number RN106586795 and Customer Number CN604256412 to the facility and company. A vicinity location map and facility plot plan are included in Appendix A as Figures 1 and 2, respectively. A simplified process flow diagram is included in two sheets as Figures 3 and 4 in Appendix A.

2. PROCESS DESCRIPTION

The Natgasoline Methanol Plant encompasses the 5,500-metric ton per day methanol production unit that synthesizes refined methanol using natural gas feedstock and water. Within this application, an "Emission Unit" (EU) is understood to mean a stationary source of regulated air pollutants that is subject or potentially subject to at least one "applicable requirement" as defined in 30 TAC §122.10. Two emission units that relate to the entire methanol process are summarized as follows:

1. The methanol process is identified in this application as EU "PRO-MEOH."
2. The collection of valves, pumps, flanges, and other piping equipment components (i.e., with potential "fugitive equipment leaks") associated with the methanol process is identified as EU "FUG-MEOH."

Other emission units associated with this project include an auxiliary boiler, plant flare, cooling water tower, storage tanks, methanol scrubber and other equipment as discussed below.

2.1 Natural Gas Feed Processing

Sweet, pipeline-quality natural gas is supplied to the methanol plant via pipeline to a natural gas compressor. A portion of the natural gas received by the site is diverted for fuel in combustion units. The majority of the natural gas is processed as feed to the methanol process unit.

Natural gas feed for the methanol plant passes through a series of feed processing steps that consist of process vessels and piping components, and there are no associated emissions points other than potential fugitive equipment leaks. A key objective of the natural gas feed processing system is to prevent any sulfur compounds from reaching sulfur-intolerant downstream catalyst beds in the reforming and methanol synthesis systems discussed below. Following are the most important steps in the natural gas feed processing system:

1. Knockout drum to remove any entrained condensate as a liquid, although this is not expected to occur during normal operation.
2. Pre-heat system to heat the natural gas by process fluid heat exchange.
3. Catalyst-based hydrogenation reactor to convert any organic sulfur compounds (e.g., mercaptans added by the supplier to odorize the gas) into hydrogen sulfide.

4. Adsorber to adsorb hydrogen sulfide out of the gas.
5. Saturation system to saturate the gas with water vapor.

2.2 Methanol Plant Reforming

The natural gas from the feed processing systems described above is mixed with steam and process recycle gas streams from the downstream methanol synthesis system. The mixture of natural gas, steam, and process recycle gas is fed to a pre-reformer reactor with a catalyst bed that converts most of the higher molecular weight hydrocarbons into methane (CH4), hydrogen (H2), and carbon monoxide (CO). The pre-reformer is an enclosed process vessel without any normal emissions except for potential fugitive equipment leaks.

The gas mixture from the pre-reformer (i.e., “pre-reformed” gas) is converted to synthesis gas by combined reforming, which is performed with a combination of steam reforming and auto-thermal reforming as described in Sections 2.2.1 and 2.2.2 below.

2.2.1 Methanol Reformer

Most of the pre-reformed gas mixture is fed to the methanol reformer. The reformer is best described as a gas-fired combustion unit integrated with a chemical reactor. As a combustion unit, the reformer system is designed to fire up to 1,552 MMBtu/hour total of fuel gas, which consists of natural gas and process waste gas. The process combustion service of the reformer (i.e., the reformer furnace) is identified in this application as EU “B-01001.” The combustion exhaust is heated using a natural gas-fired auxiliary burner before being further processed for steam generation and other heat recovery steps. The reformer auxiliary burners and associated steam generation system is identified as EU “B-01002.” The combined reformer furnace and auxiliary burner exhaust gases are routed to a selective catalytic reduction (SCR) system to reduce NOX emissions prior to exhausting to atmosphere.

As a chemical reactor, the reformer contains a catalyst system that converts methane and steam into carbon monoxide and hydrogen (i.e., the endothermic “reforming” reaction). Some of the carbon monoxide reacts with additional steam and form carbon dioxide and additional hydrogen (i.e., the exothermic “shift” reaction). Therefore, the primary chemical reactions in the steam

reformer can be expressed as follows:

- Reforming reaction: $CH_4 + H_2O + Heat \rightleftharpoons CO + 3H_2$
- Shift reaction: $CO + H_2O \rightleftharpoons CO_2 + H_2 + Heat$

The chemical reaction process is entirely enclosed within the steam reformer system, and there are no associated chemical waste gas steams during normal operation, except for potential fugitive equipment leaks (and the above-described fuel combustion exhaust). The steam reformer process effluent contains hydrogen, carbon monoxide, carbon dioxide, unconverted steam, and other gases that are fed to the auto-thermal reformer (ATR) as discussed below.

2.2.2 Auto-Thermal Reformer (ATR)

A portion of the pre-reformed gas mixture is bypassed around the steam reformer and mixed with steam reformer effluent. This mixture is fed to the ATR, along with a stream of pure oxygen, as a secondary catalyst-based reforming step. The ATR does not rely on heat from any external fuel combustion and is based on an entirely different type of reforming process as compared to the above-described steam reformer. The ATR reaction section is an enclosed process without generating waste gases or any air pollutant emissions except for potential fugitive equipment leaks. The primary ATR chemical processes can be expressed as follows:

- Complete methane oxidation reaction: $CH_4 + 2O_2 \rightleftharpoons CO_2 + 2H_2O + Heat$
- Partial methane oxidation reaction: $CH_4 + O_2 \rightleftharpoons CO + H_2 + H_2O + Heat$
- Reforming reaction: $CH_4 + H_2O + Heat \rightleftharpoons CO + 3H_2$
- Shift reaction: $CO + H_2O \rightleftharpoons CO_2 + H_2 + Heat$

The ATR effluent is called “synthesis gas” and consists of hydrogen, carbon monoxide, carbon dioxide, and other gases at precisely controlled concentrations. The synthesis gas is cooled in heat recovery/steam generation processes and then compressed for downstream synthesis. The synthesis gas compression section produces a small and continuous process waste gas stream from the compressor seal system, which is routed to the process flare. In this application, the combination of compressor seal gas and other gases routed to the flare are identified as EU “S-10001VT.”

2.3 Methanol Synthesis

Synthesis gas from the above-described ATR is mixed with additional hydrogen and synthesis recycle gas. This mixture is fed to the methanol synthesis process. The methanol synthesis reactions are exothermic and will take place in two parallel water-cooled methanol reactors followed by a gas-cooled methanol reactor containing a catalyst matrix. The primary chemical reactions can be expressed as follows:

- $CO + 2H_2 \rightarrow CH_3OH$ (methanol)
- CO2 + 3H2 → CH3OH + H2O

The resulting crude methanol liquid is separated from the recycle gas and routed to the methanol distillation unit. The separated crude methanol liquid includes water, liquid impurities, and dissolved gases that are removed in downstream distillation operations. The separated recycle gas is returned to the synthesis reactors for additional conversion to methanol. A small portion is purged and routed to the fuel gas system to maintain the inert gas level.

During startup of the entire methanol plant, synthesis gas that is normally fed to the methanol synthesis process is routed to the process flare for a limited duration (typically about 28 hours per cold startup). The combination of such maintenance, startup, and shut-down (MSS) gases and other gases routed to flare is identified as EU “S-10001VT” in this application. With the exception of this startup operation, the methanol synthesis process is an enclosed process that does not generate any waste gases or air pollutant emissions during normal operation, except for potential fugitive equipment leaks.

2.4 Methanol Distillation

The methanol distillation process separates the methanol from the following key impurities: water, dissolved gases, and other compounds. The crude methanol is purified and partially vaporized in a three-column system as follows:

1. First, the pre-run column removes low boiling by-products and dissolved gases; these gaseous overheads will be routed to the fuel gas system.
2. Next, the pressure column removes water and other higher boiling compounds from

the pre- run column effluent. The overheads from the pressure column are product quality methanol and will also re-boil the atmospheric column.

3. Finally, the atmospheric column removes the methanol product out of the pressure column bottoms by cooling the hot vapor methanol from the top of the pressure column.

During startup of the entire methanol plant, certain distillation process gas streams that are normally routed into the reformer fuel gas system are instead routed to flare for a short duration (typically about twenty-eight hours per cold startup) while the reformer fuel gas composition is slowly adjusted. The combination of such MSS gases and other gases routed to flare is identified as EU “S-10001VT” in this application.

With the exception of this startup operation, the methanol distillation process is an enclosed process that does not generate any waste gases or air pollutant emissions during normal operation, except for potential fugitive equipment leaks. Product methanol storage and loading operations are discussed in Section 2.5 below.

2.5 Storage and Product Loading

Intermediate methanol product from the methanol plant is stored in the onsite methanol storage tank farm before delivery to customers via a pipeline to a nearby storage terminal. The onsite tank farm includes one crude (or off-specification) methanol tank identified as EU “TK-04001” and two methanol “shift” tanks identified as EUs “TK- 04002A/B.” These methanol tanks are all vertical fixed roof tanks with nitrogen blanketing. The nitrogen prevents air intrusion into the tanks. The methanol storage tank vent lines are routed to a water scrubber (D-04001). The scrubber removes methanol vapors from the tank vent gases using water as an absorbent. Spent washing solution, enriched with absorbed methanol, is fed back to the methanol process via the pre-run column feed.

The methanol plant includes a de-inventory slop tank identified as EU “TK-03007.” This is a small, horizontal process vessel that vents to the plant flare, and it receives liquid mixtures of waste and hydrocarbons generated during MSS activities.

In addition to the larger storage tanks discussed above, the facility includes a variety of smaller tanks and vessels that are considered FOP "off-permit" sources in accordance with the TCEQ Form OP- UA3 instructions. For example, small diesel storage tanks for fueling the emergency engines discussed below each have a capacity less than 500 gallons and are therefore considered "off-permit" sources.

2.6 Supporting Operations

Following is a summary of several key utility and other operations that serve to support the methanol plant operations discussed in the sections above.

2.6.1 Fuel Gas System

A small fraction of the pipeline-supplied natural gas is used as pilot fuel for the auxiliary steam boiler and flare. Pure natural gas is the primary fuel for all combustion units during certain startup and shut-down operations. However, the primary fuel for normal operation of the auxiliary boiler and reformer is a blended fuel gas from a single fuel gas system that supports the entire methanol plant.

The fuel gas system blends the fuel gases from the various process units that produce fuel gas, and the fuel gas system also pressurizes the fuel gas and removes any condensable liquids before the blended fuel gas is distributed to the combustion units. Total fuel gas processed in this system is less than the site-wide fuel gas demand during normal operations, and pipeline-supplied natural gas is added as needed to make up the difference between process fuel gas supply and total fuel gas demand. The fuel gas system is an enclosed process that does not produce any waste gases or air pollution emissions during normal operations except for potential fugitive equipment leaks.

2.6.2 Auxiliary Boiler

The auxiliary boiler, identified as EU "B-14001," is designed to fire up to 950 MMBtu/hour of natural gas and/or fuel gas from the fuel gas system. The boiler provides process steam to the

entire methanol plant and the co-located air separation unit. The boiler is constructed with a SCR system to reduce emissions of NO_X.

Steam condensate from various areas in the process units is routed to the boiler as boiler feed water via a de-aerator. Condensate from the reformed gas waste heat system contains traces of dissolved gases, which are removed by the de-aerator.

2.6.3 Cooling Water System

A circulating cooling water system with a cooling water tower identified as EU "T-06001" provides cooling for all gas to methanol process operations. Approximately 9 million gallons per hour of water is circulated through the cooling water tower. The heated water from the process units is returned to the cooling tower risers. The cooling water tower is equipped with mist eliminators and induced air flow fans for each of the ten cells.

2.6.4 Flare System

A stationary process flare with a continuous pilot is identified as EU "S-10001." The main purpose of the flare is to safely manage combustible waste gases generated during planned MSS operations and process upset events. During normal operations, the flare only receives process waste gas from the compressor seal vents, pilot fuel (natural gas), sweep gas, and supplemental natural gas. During planned MSS operations, the flare will also receive various MSS-related waste gas streams. Process upset events are not included in the permit authorization. The combination of MSS gases and all other gases routed to flare is identified as EU "S-10001VT" in this application.

2.6.5 Air Separation Unit

An Air Separation Unit (ASU) is co-located at the site to contractually provide oxygen to the secondary reformer (i.e., the ATR). This unit separates air into its primary components, nitrogen and oxygen using cryogenic separation. The ASU is supplied with steam from the auxiliary boiler. The ASU is located within the plant boundary and is operated from the joint control room. However, the ASU is owned and operated by a separate company that specializes in air

separation. Any emissions from this facility are not part of this permit.

2.6.6 Emergency Engines

The facility includes an emergency generator engine (EU “H-EMG”) and two pump engines for firewater (EUs “H-FWP1” and “H-FWP2”) to respond to utility power outages and emergency situations. All three of these engines are diesel-fired stationary reciprocating internal combustion engines.

During normal facility operations, these three engines are operated for short durations from time to time as needed for maintenance and testing purposes.

2.7 Planned Maintenance, Startup, and Shutdown Activities

Planned MSS activities may occur to ensure the operation of the methanol plant. Such activities will require shutdown of the processes and subsequent start-up to return to normal operations. A common flare at the site controls emissions from planned MSS activities, including combustion of synthesis gas, reformer fuel gas, and/or gases from equipment clearing. Other MSS activities may include maintenance of the storage tanks, including tank degassing and cleaning. Emissions from tank degassing are routed to control using a temporary control device, including but not limited to, a flare, thermal oxidizer, vapor combustor, or reciprocating internal combustion engine.

3. SUPPLEMENTAL APPLICABILITY INFORMATION

This section explains or clarifies selected applicability determinations and FOP application design features as discussed below.

3.1 Grouped Emission Units

As specified in the TCEQ's FOP guidance, emissions units with the same unit attributes and applicable requirements are organized in groups as specified in the Form OP-SUM in Appendix B of this application. Organizing similar units into groups minimizes the amount of redundant information needed in the FOP application and permit documents. Following are the units that are organized into emission unit groups with a brief group description:

- The group identified as "GRP-TKMEOH" is comprised of three methanol storage tank EUs: TK- 04001, TK-04002A, and TK-04002B. All three of these tanks are subject to the same applicable requirements. Vapors from all three tanks will be captured, combined, and routed to a common water scrubber (D-04001) to remove the vapors.
- The diesel tanks are also grouped according to the size of the tank. GRP-TKDSL1 covers diesel tanks between 1,000 to 25,000 gallons, and GRP-TKDSL2 covers tanks less than 1,000 gallons.

3.2 Complex Unit, Attribute, and Applicability Relationships

Several EUs are complicated because of the relationships between the associated equipment configurations, potentially applicable requirements, and FOP application Unit Attribute (UA) forms. The TCEQ's FOP guidance does not specify how these more complex relationships should be addressed in the FOP application. Following is additional information to describe these more complex unit, attribute, and applicability relationships:

- **Reformer Furnace B-01001**: Process furnace applicability and attributes are addressed in form OP-UA5. The unit also receives a regulated fuel gas stream with associated process vent applicability/attributes addressed in form OP-UA15. Combustion exhaust from this unit is routed to atmosphere via the Auxiliary Burner System discussed below.

- **Reformer Auxiliary (Aux) Burners B-01002**: Steam generation applicability and attributes are addressed in form OP-UA6. The unit also receives a regulated fuel gas stream with associated process vent applicability/attributes addressed in form OP-UA15. Exhaust from this unit and the Reformer Furnace discussed above are combined in one stack with a total stack flow that can exceed 100,000 actual cubic feet per minute (ACFM), with associated visible emissions applicability/attributes addressed in form OP-UA15.
- **Auxiliary (Aux) Boiler B-14001**: This is an entirely separate combustion unit from the Reformer Aux Burner System discussed above. For this unit, steam generation applicability and attributes are addressed in form OP-UA6. This unit also receives a regulated fuel gas stream with associated process vent applicability/attributes addressed in form OP-UA15. Exhaust from this unit can exceed 100,000 ACFM and associated visible emissions applicability/attributes are addressed in form OP-UA15.
- **MeOH Flare S-10001 and Process Vent to Flare S-10001VT**: The Process Vent EU represents the entire combined flow of gas from the flare header into the flare. The combined flare vent includes vent gases and natural gas from multiple equipment and activity sources. Potentially applicable requirements for the vent apply at the combined gas stream immediately upstream of the flare, and the associated applicability and attributes are addressed in form OP-UA15. The MeOH Flare EU represents flare combustion and emission control features with associated applicability/attributes addressed in form OP-UA7.

3.3 Consolidated Federal Air Rule Overlaps

The 40 CFR 65 Consolidated Federal Air Rule (CAR) for the Synthetic Organic Chemical Manufacturing Industry is an optional rule that facilities can apply voluntarily to qualifying process vents and certain other EU types. The CAR is an alternative to complying with various subparts under parts 40 CFR 60 and 40 CFR 63 and certain other rules that would otherwise apply to the EU.

Natgasoline has elected to apply the CAR to the combined fuel gas streams burned in the following EUs: a) Reformer Furnace (B-01001), b) Reformer Aux Burners B-01002, and c) Aux Boiler (B-14001). For these EUs, the CAR will provide a simplified set of applicable requirements

that will avoid the complexity and inefficiency associated with a matrix of 40 CFR 60 and 40 CFR 63 subpart requirements that would otherwise apply. The Aux Burner is included, although this unit does not currently have the capability to utilize fuel gas for combustion.

3.4 Compliance Assurance Monitoring

Compliance Assurance Monitoring (CAM) applies to certain air pollution abatement systems based on several criteria related to emission rates, other applicable requirements, and equipment/instrument configuration. These CAM applicability factors, and the CAM compliance options are discussed in the TCEQ's "Compliance Assurance Monitoring" guidance document identified as APDG 5824 and last updated in April 2009.

Natgasoline proposes no changes to the approved CAMs of the 2019 FOP.

3.5 Periodic Monitoring

Natgasoline proposes no changes to the approved PMs of the 2019 FOP.

3.6 Noncompliance

Included in this FOP permit renewal, Natgasoline has identified two units that are not operating within the current NSR limits, Furnace Reformer B-01001 and Auxiliary Boiler B-14001. Noncompliance situations for the reformer include an exceedance of ammonia ppmvd emissions, ammonia lb/hr emissions, and an exceedance of the percent of natural gas to the reformer. The noncompliance situation for the auxiliary boiler is an exceedance of PM2.5 lb/hr emissions. Natgasoline has identified corrective action plans for each noncompliance situation. Form OP-ACPS, Application Compliance Plan and Schedule, has been attached to this FOP Permit renewal and details the areas of noncompliance and corresponding corrective action plans.

4.0 APPLICATION FORMS

The following TCEQ application forms are included in the appendices to this update to the renewal application:

- **Appendix B – General Forms:**
  - OP-2, Application for Permit Revision/Renewal;
  - OP-ACPS, Application Compliance Plan and Schedule; and
- **Appendix C – Summary Forms:**
  - TCEQ-20648 Form, Major NSR Summary Table.
- **Appendix E – Applicability and Requirements Forms:**
  - OP-REQ1 (Page 87), Area-Wide Applicability Determinations/General Information;

Major NSR Summary Table

Permits Numbers: 107764 and PSDTX1340					Issuance Date: 08/09/2024		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.
B-01001	Reformer	NOx	23.28	58.69	2, 8, 17, 18, 20	2, 17, 18, 20	2, 17, 18
B-01001	Reformer	NOx (6)	62.08	6.83	8, 17	17	17
B-01001	Reformer	NH3	5.71	21.57	8, 17, 18, 20	17, 18, 20	17, 18
B-01001	Reformer	CO	93.84	124.18	8, 17, 18, 20	17, 18, 20	17, 18
B-01001	Reformer	VOC	8.37	10.16	8		
B-01001	Reformer	SO2	1.52	5.75	5, 8		
B-01001	Reformer	PM	6.29	23.77	8		
B-01001	Reformer	PM10	6.29	23.77	8		
B-01001	Reformer	PM2.5	5.53	20.92	8, 18, 20	18, 20	18
B-01001	Reformer	PM2.5 (7)	6.64	0.4	8		
B-14001	Auxiliary Boiler	NOx	14.25	30.57	2, 17, 18, 19	2, 17, 18, 19	2, 17, 18
B-14001	Auxiliary Boiler	NOx (6)	38.00	3.42	17	17	17
B-14001	Auxiliary Boiler	NH3	3.64	11.71	17, 18, 19	17, 18, 19	17, 18
B-14001	Auxiliary Boiler	CO	59.96	38.57	17, 18, 19	17, 18, 19	17, 18

Major NSR Summary Table

Permits Numbers: 107764 and PSDTX1340					Issuance Date: 08/09/2024		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.
B-14001	Auxiliary Boiler	VOC	5.12	16.479			
B-14001	Auxiliary Boiler	SO_2	0.53	1.71	5		
B-14001	Auxiliary Boiler	PM	4.49	14.44			
B-14001	Auxiliary Boiler	PM_{10}	4.49	14.44			
B-14001	Auxiliary Boiler	$PM_{2.5}$	3.95	12.71	18, 19	18, 19	18
S-10001	MeOH Flare	NOx	2.28	10.01	11	11	
S-10001	MeOH Flare	CO	15.39	67.57	11	11	
S-10001	MeOH Flare	VOC	0.84	3.68	3, 11	3, 11	3
S-10001	MeOH Flare	MeOH	0.42	1.83	3, 11	3, 11	3
S-10001	MeOH Flare	SO_2	0.043	0.19	5, 11	11	
S-10001 MSS	MeOH Flare MSS	NOx	425.11	19.70	11	11, 23	
S-10001 MSS	MeOH Flare MSS	CO	3644.98	300.31	11	11, 23	
S-10001 MSS	MeOH Flare MSS	VOC	158.59	1.12	3, 11	3,11, 23	3
S-10001 MSS	MeOH Flare MSS	MeOH	151.04	0.85	3, 11	3, 11, 23	3

Major NSR Summary Table

Permits Numbers: 107764 and PSDTX1340					Issuance Date: 08/09/2024		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.
S-10001 MSS	MeOH Flare MSS	SO_2	12.55	0.6	5, 11	11, 23	
D-04001	MeOH Water Scrubber 1	VOC	7.24	1.65	3, 12, 18	3, 10, 12, 18	3, 18
D-04001	MeOH Water Scrubber 1	MeOH	7.24	1.65	3, 12, 18	3, 10,, 12, 18	3, 18
FUG-MeOH	MeOH Fugitives (5)	VOC	9.73	7.44	3, 13, 15	3, 13, 15	3, 15
FUG-MeOH	MeOH Fugitives (5)	MeOH	9.63	6.94	3, 13, 15	3, 13, 15	3, 15
FUG-MeOH	MeOH Fugitives (5)	NH_3	0.01	0.01	16	16	
T-06001	MeOH Cooling Tower	VOC	7.54	10.41	3, 14	3, 14	3
T-06001	MeOH Cooling Tower	MeOH	7.54	10.41	3, 14	3, 14	3
T-06001	MeOH Cooling Tower	PM	37.70	82.57			
T-06001	MeOH Cooling Tower	PM_{10}	0.58	1.27			
T-06001	MeOH Cooling Tower	$PM_{2.5}$	0.01	0.03			

Major NSR Summary Table

Permits Numbers: 107764 and PSDTX1340					Issuance Date: 08/09/2024		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.
TEMP-MSS	Controlled Tank MSS Emissions	NOx	0.59	0.01	26, 27, 28	23, 26, 27, 28	
TEMP-MSS	Controlled Tank MSS Emissions	CO	1.17	0.02	26, 27, 28	23, 26, 27, 28	
TEMP-MSS	Controlled Tank MSS Emissions	VOC	6.74	0.12	26, 27, 28	23, 26, 27, 28	
TEMP-MSS	Controlled Tank MSS Emissions	MeOH	6.73	0.12	26, 27, 28	23, 26, 27, 28	
TEMP-MSS	Controlled Tank MSS Emissions	SO_2	<0.01	<0.01	26, 27, 28	23, 26, 27, 28	
TEMP-MSS	Controlled Tank MSS Emissions	PM	0.03	<0.01	26, 27, 28	23, 26, 27, 28	
TEMP-MSS	Controlled Tank MSS Emissions	PM_{10}	0.03	<0.01	26, 27, 28	23, 26, 27, 28	
TEMP-MSS	Controlled Tank MSS Emissions	$PM_{2.5}$	0.03	<0.01	26, 27, 28	23, 26, 27, 28	
FUG-MSS	Atmosphere MSS Emissions	VOC	29.00	0.09	25, 26, 27	23, 24, 25, 26, 27	
FUG-MSS	Atmosphere MSS Emissions	MeOH	29.00	0.09	25, 26, 27	23, 24, 25, 26, 27	

(1) Emission point identification – either specific equipment designation or emission point number from plot plan.
(2) Specific point source name. For fugitive sources, use area name or fugitive source name.
(3) NO_x – total oxiders of nitrogen
PM – total particulate matter, suspended in the atmosphere, including PM_{10} and $PM_{2.5}$
PM_{10} – particulate matter equal to or less than 10 microns in diameter, including $PM_{2.5}$
$PM_{2.5}$ – particulate matter equal to or less than 2.5 microns in diameter
CO – carbon monoxide
MeOH – methanol
(4) Compliance with annual emission limits (tons per year) is based on a 12-month rolling period.
(5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.
(6) The emission limit applies only during startup as defined in Special Condition 7.
(7) The emission limit applies only during start-up of the methanol unit (Reformer) for a maximum of 220 hours per year.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 10/23/2024	**Regulated Entity No.: RN106586795**	**Permit No.: O3963**
Company Name: Natgasoline LLC		**Area Name: Methanol 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**	
The *Responsible Official* 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.		
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?	☒ YES ☐ NO
2.	Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	☒ YES ☐ NO
3.	If the response to Item B.2, above, is "Yes," indicate the total number of Part 2 attachments included in this submittal. *(For reference only)*	4
*	*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.* *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.*	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 10/23/2024	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): B-01001 Reformer

SOP Index No.:

Pollutant: NH_3

Applicable Requirement

Citation	Text Description
NSR Permit 107764, SC 6C	Limit shall not exceed 10 PPMVD NH_3
	corrected to 3% O2 on an hourly average

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
SC 17 CEMS monitoring	Process data analysis	Semi-annual deviation report (SDR) for reporting period 1/1/2024 to 6/30/2024, Item 3

3. Non-compliance Situation Description

NH_3 emissions exceeded 10 PPMVD in reformer stack

4. Corrective Action Plan Description

Natgasoline Operations will revise existing operator training and standard operating procedures to expand the NOx operating window to include a slight increase in allowable NOx emissions and as a result reduce NH3 injection.

5. List of Activities/Milestones to Implement the Corrective Action Plan

Based on our new permit limits for NOx energy (0.015 lb/mmbtu), in the near term Natgasoline Operations will revise existing operator training and standard operating procedures to expand the NOx operating window to include a slight increase in allowable NOx emissions and as a result reduce NH3 injection. It is believed that with optimization, both limits can be met. With the prior NOx energy permit limits, it was a challenge to maintain NOx in compliance without at least some periodic exceedance on ammonia emissions. Estimated implementation date of Q3 2025.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 10/23/2024	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOV of 1/12/2024	03/04/2024
7. Progress Report Submission Schedule	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 10/23/2024	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): B-01001 Reformer

SOP Index No.:

Pollutant: NH_3

Applicable Requirement

Citation	Text Description
NSR Permit 107764 MAERT	Permitted emissions

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
MAERT exceedance	lb/hr limit	Semi-annual deviation report (SDR) for reporting period 1/1/2024 to 6/30/2024, Item 4

3. Non-compliance Situation Description

Permit exceedance in lb/hr

4. Corrective Action Plan Description

Natgasoline Operations will revise existing operator training and standard operating procedures to expand the NOx operating window to include a slight increase in allowable NOx emissions and as a result reduce NH3 injection.

5. List of Activities/Milestones to Implement the Corrective Action Plan

Based on our new permit limits for NOx energy (0.015 lb/mmbtu), Natgasoline Operations will revise existing operator training and standard operating procedures to expand the NOx operating window to include a slight increase in allowable NOx emissions and as a result reduce NH3 injection. It is believed that with optimization, both limits can be met. With the prior NOx energy permit limits, it was a challenge to maintain NOx in compliance without at least some periodic exceedance on ammonia emissions.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 10/23/2024	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOV of 1/12/2024	03/04/2024
7. Progress Report Submission Schedule	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 10/23/2024	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): B-01001 Reformer

SOP Index No.:

Pollutant: N/A

Applicable Requirement

Citation	Text Description
NSR Permit 107764, SC 8C	The percent of natural gas, on an hourly basis, shall not
	exceed the maximum percent of natural gas established
	during performance testing

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
NSR Permit 107764, SC 8C	Natural gas percentage	Semi-annual deviation report (SDR) for reporting period 1/1/2024 to 6/30/2024, Item 6

3. Non-compliance Situation Description

Reformer operated above the maximum total natural gas established through performance testing.

4. Corrective Action Plan Description

Natgasoline has a performance test tentatively scheduled for the first quarter of 2025 to reestablish the maximum percent of natural gas operating condition.

5. List of Activities/Milestones to Implement the Corrective Action Plan

Reestablish the maximum percent of natural gas through a tentatively scheduled performance test in 2025.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 10/23/2024	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOE of 1/12/2024	03/04/2024
7. Progress Report Submission Schedule	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 10/23/2024	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): B-14001 Aux Boiler

SOP Index No.:

Pollutant: $PM_{2.5}$

Applicable Requirement

Citation	Text Description
NSR Permit 107764 MAERT	Permitted emissions

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
MAERT exceedance	lb/hr limit	Semi-annual deviation report (SDR) for reporting period 1/1/2024 to 6/30/2024, Item 14

3. Non-compliance Situation Description

PM 2.5 lb/hr emissions exceeded maximum allowable emission rate during normal operating conditions as per MAERT Table.

4. Corrective Action Plan Description

The previous performance test did not speciate PM2.5 from PM. The emissions from PM2.5 were assumed to be equal to PM10. Natgasoline will conduct a new performance test in the first quarter of 2025 to speciate PM.

5. List of Activities/Milestones to Implement the Corrective Action Plan

Reestablish the PM2.5 emissions limit through a tentatively scheduled performance test in 2025.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 10/23/2024	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**

7. Progress Report Submission Schedule

Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1
Texas Commission on Environmental Quality

Date: 10/23/2024	
Permit No.: O3963	
Regulated Entity No.: RN106586795	
Company Name: Natgasoline LLC	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA?	☒ YES ☐ NO
I. Application Type	
Indicate the type of application:	
☒ Renewal	
☐ Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
☐ Significant Revision	
☐ Revision Requesting Prior Approval	
☐ Administrative Revision	
☐ Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only	☒ YES ☐ NO
For GOP Revisions Only	☐ YES ☐ 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].)*						
☐ VOC	☒ NO_X	☐ SO_2	☐ PM_{10}	☒ CO	☐ Pb	☒ 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)?				☒ YES	☐ NO	☐ 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: 10/23/2024
Permit No.: O3963
Regulated Entity No.: RN106586795
Company Name: Natgasoline LLC

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	SIG-C	YES	TANKVCUN	OP-UA01	174371	Added natural gas portable VCU
2	SIG-C	YES	TANKVCUP	OP-UA01	174371	Added propane portable VCU
3	ADMIN-G	NO	B-01001, B-14001	OP-UA06 OP-UA01 OP-UA05	107764	AMOC for ammonia analyzer on stacks
4	SIG-C	NO	TK-03007	OP-UA3	107764	Natgasoline removed EPN No. TK-03007 in the renewal and modification to the NSR Permit 107764. The NSR permit was issued on August 9, 2024. TK-03007 is reclassified as a process vessel and throughput, fill rate, and hours of operation requirements have been removed.

5	SIG-C	NO	F-10001	NONE	107764	Under the Flare Design and Operations in the NSR, the Natgasoline permit removed the condition requiring the 1:4 ratio of supplemental gas to waste gas. The Methanol Flare is bound by SC.11.A, which references 40 CFR 60.18 and requires that the vent gas to the flare is maintained above the 200 BTU/scf for un-assisted flares. This 1:4 requirement significantly increases flare emissions. These increased emissions associated with combustion go against our MAERT limits, as well as requires reporting of these excessive emissions under various emission reporting requirements.
6	SIG-C	NO	D-04001	NONE	107764	During Methanol Plant shutdowns, the methanol storage tank emissions may be routed to a temporary VCU, in accordance with the Natgasoline Standard Permit 174371. The NSR permit authorized that the 13 gpm minimum scrubber flow requirement will not apply during this period. In addition, Natgasoline added this activity to the MSS Activity Summary Table - Attachment A in the NSR Permit.

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

Date: 10/23/2024		
Permit No.: O3963		
Regulated Entity No.: RN106586795		
Company Name: Natgasoline LLC		
I.	**Significant Revision** *(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)*	
A.	Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322?	☒ YES ☐ 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?	☐ YES ☒ NO

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

Using the table below, indicate the air pollutant(s) that will be changing and include a brief description of the change in pollutant emissions for each pollutant:

Pollutant	Description of the Change in Pollutant Emissions

Date:	10/23/2024
Permit No.:	O3963
RN No.:	106586795

For SOP applications, answer ALL questions unless otherwise directed.
♦ *For GOP applications, answer ONLY these questions unless otherwise directed.*

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.: PSDTX1340	Issuance Date: 08/09/2024	Pollutant(s): VOC, NOX, CO, PM, PM10
PSD Permit No.: GHGPSDTX54	Issuance Date: 08/09/2024	Pollutant(s): GHG
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.: 107764	Issuance Date: 08/09/2024	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.: 174371	Issuance Date: 11/14/2023	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

Title V Existing

3963

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	NATGASOLINE METHANOL PLANT
Does the site have a physical address?	No
Because there is no physical address, describe how to locate this site:	2366 Sulphur Plant Road
City	Beaumont
State	TX
ZIP	77705
County	JEFFERSON
Latitude (N) (##.######)	30.012222
Longitude (W) (-###.######)	94.036388
Primary SIC Code	2869
Secondary SIC Code	
Primary NAICS Code	325199
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN106586795
What is the name of the Regulated Entity (RE)?	BEAUMONT GAS TO GASOLINE PLANT
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	2366 SULPHUR PLANT RD
City	BEAUMONT
State	TX
ZIP	77705
County	JEFFERSON
Latitude (N) (##.######)	30.03143
Longitude (W) (-###.######)	-94.05388
Facility NAICS Code	
What is the primary business of this entity?	CHEMICAL MANUFACTURING

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN604256412
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Natgasoline LLC
Texas SOS Filing Number	801689918
Federal Tax ID	680682889
State Franchise Tax ID	32049571162
State Sales Tax ID	

Local Tax ID	
DUNS Number	79934278
Number of Employees	101-250
Independently Owned and Operated?	No

Responsible Official Contact

Person TCEQ should contact for questions about this application:	
Organization Name	NATGASOLINE LLC
Prefix	MR
First	LARRY
Middle	
Last	RICHARD
Suffix	
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)	PO BOX 20339
Routing (such as Mail Code, Dept., or Attn:)	
City	BEAUMONT
State	TX
ZIP	77720
Phone (###-###-####)	4093444900
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	larry.richard@natgasoline.com

Technical Contact

Person TCEQ should contact for questions about this application:	
Select existing TC contact or enter a new contact.	MIGUEL MARTINEZ(NATGASOLINE LLC...)
Organization Name	NATGASOLINE LLC
Prefix	MR
First	MIGUEL
Middle	
Last	MARTINEZ
Suffix	
Credentials	
Title	ENVIRONMENTAL MANAGER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 20339

Routing (such as Mail Code, Dept., or Attn:)	
City	BEAUMONT
State	TX
ZIP	77720
Phone (###-###-####)	4093444974
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	miguel.martinez@natgasoline.com

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	30 Deg 0 Min 44 Sec
3) Permit Longitude Coordinate:	94 Deg 2 Min 11 Sec
4) Is this submittal a new application or an update to an existing application?	Update
4.1. Select the permit/project number for which this update should be applied.	3963-36358
5) 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)

[File Properties]

File Name	OP_2_Form OP-2 Rev 1.pdf
Hash	D184AB259452AEDFA02977B1F835D5E280A9EE265F7AF4908698F7A08B7756D4
MIME-Type	application/pdf

Attach OP-ACPS (Application Compliance Plan and Schedule)

Attach OP-REQ1 (Application Area-Wide Applicability Determinations and General Information)

[File Properties]

File Name	OP_REQ1_Form OP-REQ1 Rev 1 (Page 87).pdf
Hash	DEBF7FC8A172AF34416BBBD63FB9F642DC439AE474A4C4554580B06051A3D9D7
MIME-Type	application/pdf

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 Void Request Form

Attach any other necessary information needed to complete the permit.

[File Properties]	
File Name	Form Major NSR Summary Table Rev 1.pdf
Hash	182E7F3EC682D7D96A467B33DC27D6916F135590AE826F5304D3C5CEB6D15A86
MIME-Type	application/pdf
[File Properties]	
File Name	Form OP-ACPS Rev 1.pdf
Hash	6D56E2F119769D8792F4B134053A44FCCEA45739C7DC07016D8EAB98D726E3F9
MIME-Type	application/pdf

An additional space to attach any other necessary information needed to complete the permit.

[File Properties]	
File Name	Federal Operating Permit Text Rev 1.pdf
Hash	4C50B40E418F7B6CBD0E6ECF753410050E397FA041F2C9B929230AFA899F8256
MIME-Type	application/pdf

Certification

I certify that I am the Responsible Official 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 Miguel A Martinez, the owner of the STEERS account ER084792.
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 enforcemer 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 3963.

9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEC

OWNER OPERATOR Signature: Miguel A Martinez OWNER OPERATOR

Account Number:	ER084792
Signature IP Address:	38.140.215.210
Signature Date:	2024-10-28
Signature Hash:	7A6FD67D2392DC16A265E96D0827A2D5A4E245F7C5D3DBD3BAF34BB25CC8C68D
Form Hash Code at time of Signature:	92B656D08EE833C471406BE17BD1260E85736A7D748F2024340AEDF9EF5EABAB

Submission

Reference Number:	The application reference number is 695868
Submitted by:	The application was submitted by ER084792/Miguel A Martinez
Submitted Timestamp:	The application was submitted on 2024-10-28 at 11:33:27 CDT
Submitted From:	The application was submitted from IP address 38.140.215.210
Confirmation Number:	The confirmation number is 574532
Steers Version:	The STEERS version is 6.82
Permit Number:	The permit number is 3963

Additional Information

Application Creator: This account was created by Charles M Munley JR

From: John Walker
Sent: Thursday, October 10, 2024 8:57 AM
To: Miguel Martinez
Cc: Philip Curwick; Jason Burnett
Subject: RE: Technical Review - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant

Good Morning,

The project was received by APIRT on 02/21/2024 and transferred to my management on 02/26/2024. I received the project on 03/06/2024. The project would have been considered administratively complete by APIRT before being transferred to me.

The project is still in technical review. I am hoping to get back to it next week and I will let you know of any deficiencies I may come across.

Please let me know if you have any other questions.

Sincerely,

John Walker
Permit Reviewer
OA/Air Permits Division/OP Section
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087
John.Walker@tceq.texas.gov

Phone: (512) 239-1277



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

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From: Miguel Martinez <Miguel.Martinez@natgasoline.com>
Sent: Wednesday, October 9, 2024 5:24 PM
To: John Walker <John.Walker@tceq.texas.gov>
Cc: Philip Curwick <pcurwick@compliance-sg.com>; Jason Burnett <jason.burnett@natgasoline.com>
Subject: RE: Technical Review - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant

Good Evening, Mr. Walker:

Would you please confirm the date Project No. 36358 for our Title V permit application was deemed administratively complete? We would appreciate the assistance. Thank you, sir.
Regards,

Miguel A. Martinez
Environmental Manager

natgasoline

PO Box 20339
Beaumont, TX 77720
2366 Sulphur Plant Road
Beaumont, TX 77705
Cell: 713-419-8935

miguel.martinez@natgasoline.com

From: John Walker <John.Walker@tceq.texas.gov>
Sent: Thursday, April 11, 2024 10:36 AM
To: Miguel Martinez <Miguel.Martinez@natgasoline.com>
Subject: Technical Review - FOP O3963/Project 36358 Natgasoline LLC/Methanol Plant

You don't often get email from john.walker@tceq.texas.gov. Learn why this is important

CAUTION: This is an external email. Please take care when clicking links or opening unexpected attachments. Contact IT at helpdesk@natgasoline.com if you require assistance.

Good Afternoon,

I have been assigned to the Federal Operating Permit (FOP) renewal application of Permit No. O3963 Natgasoline LLC, Methanol Plant. This application has been assigned Project No. 36358. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

In addition, I wanted to let you know that EPA has, on occasion, objected to Title V permits based on the following:

a. NSR permit and PBR monitoring sufficiency –please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient.
b. Reference to confidential business information (CBI) in NSR permits and PBR submittals.
c. High level terms in the SOP Applicable Requirement Summary Table. The high level terms are sometimes used in SOPs when unit attribute forms have not yet been updated due to regulatory amendments.
d. Accuracy of PBR information provided on the supplemental table and in the permit – please refer to Forms OP-PBRSUP and OP-REQ1 Instructions.

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.

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.

Please review 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 the review process and application update procedures. 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,

John Walker
Permit Reviewer
OA/Air Permits Division/OP Section
Texas Commission on Environmental Quality
MC-163, P.O. Box 13087
Austin, TX 78711-3087
John.Walker@tceq.texas.gov

Phone: (512) 239-1277



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

Brooke T. Paup, *Chairwoman*
Bobby Janecka, *Commissioner*
Catarina R. Gonzales, *Commissioner*
Kelly Keel, *Executive Director*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 3, 2025

THE HONORABLE BRANDON CREIGHTON
TEXAS SENATE
PO BOX 12068
AUSTIN TX 78711-2068

Re: Accepted Federal Operating Permit Renewal Application
Project Number: 36358
Permit Number: O3963
Natgasoline LLC
Natgasoline Methanol Plant
Beaumont, Jefferson County
Regulated Entity Number: RN106586795
Customer Reference Number: CN604256412

Dear Senator Creighton:

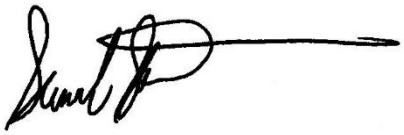
This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) renewal application for a site located in your district. As part of this permitting process, the applicant is required to publish a formal newspaper public notice. The notice will 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=-94.036388,30.012222&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.

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,



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

Brooke T. Paup, *Chairwoman*
Bobby Janecka, *Commissioner*
Catarina R. Gonzales, *Commissioner*
Kelly Keel, *Executive Director*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 3, 2025

THE HONORABLE DADE PHELAN
TEXAS HOUSE OF REPRESENTATIVES
PO BOX 2910
AUSTIN TX 78768-2910

Re: Accepted Federal Operating Permit Renewal Application
Project Number: 36358
Permit Number: O3963
Natgasoline LLC
Natgasoline Methanol Plant
Beaumont, Jefferson County
Regulated Entity Number: RN106586795
Customer Reference Number: CN604256412

Dear Representative Phelan:

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=-94.036388,30.012222&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,

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

Carolyn Thomas

From: Philip Curwick <pcurwick@compliance-sg.com>
Sent: Tuesday, February 27, 2024 11:51 AM
To: Carolyn Thomas
Cc: miguel.martinez@natgasoline.com; Scott Kolb; David Lemoine
Subject: FW: Natgasoline LLC Permit 3963, Project 36358
Attachments: Form OP-1 Rev (02_27_2024).pdf

Carolyn,

Mr. Martinez is offsite and in training today and we wanted to provide a timely response. Therefore, I have revised the OP-1 and included a copy of the form with this email.

If you need anything else, please feel free to contact Miguel or myself.

Thank you,

Phil Curwick
Compliance Solutions Group
225-754-0405 Office
225-620-3075 Cell

From: Miguel Martinez <Miguel.Martinez@natgasoline.com>
Sent: Tuesday, February 27, 2024 11:28 AM
To: Philip Curwick <pcurwick@compliance-sg.com>; David Lemoine <dlemoine@compliance-sg.com>
Cc: Scott Kolb <Scott.Kolb@natgasoline.com>
Subject: FW: Natgasoline LLC Permit 3963, Project 36358

Hi Phil:

Please help me with the email below. I am taking the OGI Course. I would appreciate the assistance.

Regards,

Miguel A. Martinez
Environmental Manager

natgasoline

PO Box 20339
Beaumont, TX 77720
2366 Sulphur Plant Road
Beaumont, TX 77705
Cell: 713-419-8935

miguel.martinez@natgasoline.com

From: Carolyn Thomas <Carolyn.Thomas@tceq.texas.gov>
Sent: Tuesday, February 27, 2024 10:57 AM
To: Miguel Martinez <Miguel.Martinez@natgasoline.com>
Subject: RE: Natgasoline LLC Permit 3963, Project 36358

CAUTION: This is an external email. Please take care when clicking links or opening unexpected attachments. Contact IT at helpdesk@natgasoline.com if you require assistance.

The OP-1 does not require a signature. You may send the updated PI 1 to my attention.

thanks

From: Miguel Martinez <Miguel.Martinez@natgasoline.com>
Sent: Tuesday, February 27, 2024 10:55 AM
To: Carolyn Thomas <Carolyn.Thomas@tceq.texas.gov>
Subject: RE: Natgasoline LLC Permit 3963, Project 36358

Hi Carolyn:

I will have the OP-1 signed by our responsible official. May I send you both a scanned and the wet ink document? I would appreciate the information. Thanks.

Regards,

Miguel A. Martinez
Environmental Manager

natgasoline

PO Box 20339
Beaumont, TX 77720
2366 Sulphur Plant Road
Beaumont, TX 77705
Cell: 713-419-8935

miguel.martinez@natgasoline.com

From: Carolyn Thomas <Carolyn.Thomas@tceq.texas.gov>
Sent: Tuesday, February 27, 2024 10:06 AM
To: Miguel Martinez <Miguel.Martinez@natgasoline.com>; Larry Richard <Larry.Richard@natgasoline.com>
Subject: RE: Natgasoline LLC Permit 3963, Project 36358

CAUTION: This is an external email. Please take care when clicking links or opening unexpected attachments. Contact IT at helpdesk@natgasoline.com if you require assistance.

Thank you for the clarification. Please update the OP-1 and send to my attention.

Thank you,
Carolyn Thomas
Air Permits Initial Review Team
Air Permits Division, MC 161
Office of Air Texas Commission on Environmental Quality
Phone: (512) 239-5127
Fax: (512) 233-0973
E-mail: carolyn.thomas@tceq.texas.gov
Web site: www.tceq.texas.gov
Please consider whether it is necessary to print this e-mail.
How are we doing? www.tceq.texas.gov/customersurvey

From: Miguel Martinez <Miguel.Martinez@natgasoline.com>
Sent: Tuesday, February 27, 2024 10:04 AM
To: Carolyn Thomas <Carolyn.Thomas@tceq.texas.gov>; Larry Richard <Larry.Richard@natgasoline.com>
Subject: RE: Natgasoline LLC Permit 3963, Project 36358

Hi Carolyn:

The language is Spanish. The proper public notice in Spanish was posted.

Regards,

Miguel A. Martinez
Environmental Manager

natgasoline

PO Box 20339
Beaumont, TX 77720
2366 Sulphur Plant Road
Beaumont, TX 77705
Cell: 713-419-8935

miguel.martinez@natgasoline.com

From: Carolyn Thomas <Carolyn.Thomas@tceq.texas.gov>
Sent: Tuesday, February 27, 2024 10:03 AM
To: Larry Richard <Larry.Richard@natgasoline.com>; Miguel Martinez <Miguel.Martinez@natgasoline.com>
Subject: Natgasoline LLC Permit 3963, Project 36358

CAUTION: This is an external email. Please take care when clicking links or opening unexpected attachments. Contact IT at helpdesk@natgasoline.com if you require assistance.

We have received your application for the above referenced facility and it is currently under review. The following item(s) are required before we can declare the application administratively complete:

Please indicate a language: (E)

B.	State Representative: Dade Phelan	
C.	Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)?	☒ YES ☐ NO ☐ N/A
D.	Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322?	☒ YES ☐ NO
E.	Indicate the alternate language(s) in which public notice is required:	

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: Natgasoline LLC
B.	Customer Reference Number (CN): **CN 604256412**
C.	Submittal Date *(mm/dd/yyyy):* 02/21/2024
II.	**Site Information**
A.	Site Name: Methanol Plant
B.	Regulated Entity Reference Number (RN): **RN 106586795**
C.	Indicate affected state(s) required to review permit application: *(Check the appropriate box[es].)*
☐ AR ☐ CO ☐ KS ☐ LA ☐ NM ☐ OK ☒ N/A	
D.	Indicate all pollutants for which the site is a major source based on the site's potential to emit: *(Check the appropriate box[es].)*
☐ VOC ☒ NO_X ☐ SO_2 ☐ PM_{10} ☒ CO ☐ Pb ☒ HAPS	
Other:	
E.	Is the site a non-major source subject to the Federal Operating Permit Program? ☐ YES ☒ NO
F.	Is the site within a local program area jurisdiction? ☐ YES ☒ NO
G.	Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? ☐ YES ☒ NO
H.	Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging: NA
III.	**Permit Type**
A.	Type of Permit Requested: *(Select only one response)*
☒ Site Operating Permit (SOP) ☐ Temporary Operating Permit (TOP) ☐ 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** *(Complete for Initial Issuance Applications Only.)*	
A.	Is this submittal an abbreviated or a full application?	☐ Abbreviated ☐ Full
B.	If this is a full application, is the submittal a follow-up to an abbreviated application?	☐ YES ☐ NO
C.	If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit?	☐ YES ☐ 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.)	☐ YES ☐ NO
E.	Has the required Public Involvement Plan been included with this application?	☐ YES ☐ NO
V.	**Confidential Information**	
A.	Is confidential information submitted in conjunction with this application?	☐ YES ☒ NO
VI.	**Responsible Official (RO) Identifying Information**	
RO Name Prefix: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)		
RO Full Name: Larry Richard		
RO Title: Plant Manager		
Employer Name: Natgasoline LLC		
Mailing Address: P.O. Box 20339		
City: Beaumont		
State: TX		
ZIP Code: 77720		
Territory:		
Country: USA		
Foreign Postal Code:		
Internal Mail Code:		
Telephone No.: 409-344-4900		
Fax No.:		
Email: larry.richard@natgasoline.com		

Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 3)
Texas Commission on Environmental Quality

VII. Technical Contact Identifying Information *(Complete if different from RO.)*	
Technical Contact Name Prefix: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)	
Technical Contact Full Name: Miguel A. Martinez	
Technical Contact Title: Environmental Manager	
Employer Name: Natgasoline LLC	
Mailing Address: P.O. Bo 20339	
City: Beaumont	
State: TX	
ZIP Code: 77720	
Territory:	
Country: USA	
Foreign Postal Code:	
Internal Mail Code:	
Telephone No.: 409-344-4974	
Fax No.:	
Email: Miguel.martinez@natgasoline.com	
VIII. Reference Only Requirements *(For reference only.)*	
A. State Senator: Brandon Creighton	
B. State Representative: Dade Phelan	
C. Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)?	☒ YES ☐ NO ☐ N/A
D. Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322?	☒ YES ☐ 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** *(Optional for applicants requesting to hold the FOP and records at an off-site location.)*
A.	Office/Facility Name:
B.	Physical Address:
City:	
State:	
ZIP Code:	
Territory:	
Country:	
Foreign Postal Code:	
C.	Physical Location:
D.	Contact Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
Contact Full Name:	
E.	Telephone No.:
X.	**Application Area Information**
A.	Area Name: Natgasoline Methanol Plant
B.	Physical Address: 2366 Sulphur Plant Road
City: Beaumont	
State: TX	
ZIP Code: 77705	
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** ***(continued)***
G.	Latitude (nearest second): 30° 0' 44"
H.	Longitude (nearest second): -94° 2' 11"
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? ☒ YES ☐ NO
J.	Indicate the estimated number of emission units in the application area: 12
K.	Are there any emission units in the application area subject to the Acid Rain Program? ☐ YES ☒ NO
XI.	**Public Notice** *(Complete this section for SOP Applications and Acid Rain Permit Applications only.)*
A.	Name of a public place to view application and draft permit: Beaumont Public Library
B.	Physical Address: 801 Pearl Street
City: Beaumont	
ZIP Code: 77701	
C.	Contact Person (Someone who will answer questions from the public during the public notice period):
Contact Name Prefix: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.):	
Contact Person Full Name: Miguel A. Martinez	
Contact Mailing Address: P.O. Box 20339	
City: Beaumont	
State: Texas	
ZIP Code: 77720	
Territory:	
Country: USA	
Foreign Postal Code:	
Internal Mail Code:	
Telephone No.: 409-344-4974	

Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 6)
Texas Commission on Environmental Quality

XII. 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 Attorney General on behalf of the TCEQ are paid in accordance with the "Delinquent Fee and Penalty Protocol."
Complete Sections XIII and XIV for Acid Rain Permit and CSAPR applications only. Please include a copy of the Certificate of Representation submitted to EPA.
XIII. Designated Representative (DR) Identifying Information
DR Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
DR Full Name:
DR Title:
Employer Name:
Mailing Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.:
Fax No.:
Email:

Complete Sections XIII and XIV for Acid Rain Permit and CSAPR applications only. Please include a copy of the Certificate of Representation submitted to EPA.
XIV. Alternate Designated Representative (ADR) Identifying Information
ADR Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
ADR Full Name:
ADR Title:
Employer Name:
Mailing Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.:
Fax No.:
Email:

natgasoline

February 21, 2024

Sent via STEERS

Mr. Jesse Chacon, PE
Manager of Operating Permits (Title V) Section
Texas Commission on Environmental Quality
Air Permits Division, MC-163
12100 Park 35 Circle
Austin, Texas 78753

RE: Submittal of SOP Permit Renewal Application
Title V Federal Operating Permit No. O3963
Natgasoline LLC; Beaumont Methanol Plant
Beaumont, Jefferson County
Regulated Entity/Customer Reference No. RN106586795 and CN604256412

Dear Mr. Chacon:

Please find enclosed application information for the renewal of the Site Operating Permit (SOP) No. O3963 for the Natgasoline LLC Beaumont Methanol Plant. The enclosed information is provided in accordance with the provisions outlined in 30 Texas Administrative Code, Chapter 122, Section 132.

Please note that the permit renewal documentation will be uploaded and submitted through STEERS.

Thank you in advance for your consideration of this application. If you have any questions concerning this application, please contact me at (409) 344-4974 or by email at miguel.martinez@natgasoline.com.

Sincerely,

Natgasoline LLC

Miguel A. Martinez
Environmental Manager

Enclosure

cc: Ms. Sarah Kirksey, Air Section Manager, TCEQ Region 10, 3870 Eastex Fwy, Beaumont, TX 77703-1830

Regional Administrator, EPA Region 6 (electronic copy only via R6AirPermitsTX@epa.gov), Air Permits Section (6PD-R), 1445 Ross Avenue, Suite 1200, Dallas, Texas 75202-2733

Federal Operating Permit
Renewal Application



Natgasoline LLC

Beaumont Methanol plant

February 2024

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LIST OF ABBREVIATIONS

Abbreviation	Term/Phrase/Name
ACFM	Actual Cubic Feet per Minute
ASU	Air Separation Unit
ATR	Auto-thermal Reformer
bpd	Barrel per day
CO	Carbon Monoxide
CH_4	Methane
CAM	Compliance Assurance Monitoring
CAR	Consolidated Federal Air Rule
EU	Emission Unit
FIN	Facility Identification Number
GHG	Green House Gas
HAP	Hazardous Air Pollutant
H_2	Hydrogen
MSS	Maintenance, startup, and shutdown
MtG	Methanol-to-Gasoline
Natgasoline	Natgasoline LLC
NSR	New Source Review
PSD	Prevention of Significant Deterioration
SCR	Selective Catalytic Reduction
TAC	Texas Administrative Code
TCEQ	Texas Commission on Environmental Quality

1. INTRODUCTION

Natgasoline LLC (Natgasoline) is applying to the Texas Commission on Environmental Quality (TCEQ) for the renewal of its Federal Operating Permit (FOP) Number O3963, which is also known as a "Title V" operating permit. The renewal of the FOP is being submitted in accordance with Title 30 of the Texas Administrative Code (30 TAC) § 122.241. Natgasoline has also included several revisions to the initial FOP issued in 2019.

The Natgasoline Methanol Plant is located near the city of Beaumont, Jefferson County, Texas. The plant produces methanol from natural gas and water. The plant has been in operation since 2018. Note that the original air permit for this facility included an additional plant process to convert the methanol into motor vehicle gasoline (MtG) and other hydrocarbon products. However, the MtG facility was never constructed, and all references to this process have been removed/excluded from this permit renewal application.

The initial FOP for the Natgasoline Methanol Plant was issued on August 21, 2019, and expires five years from this date. Other active permits for this facility include New Source Review (NSR) and Prevention of Significant Deterioration (PSD) permit numbers 107764 and PSDTX1340, and Green House Gas (GHG) emissions under a separate PSD permit, which is identified as permit number GHGPSDTX54. The TCEQ has assigned Regulated Entity Number RN106586795 and Customer Number CN604256412 to the facility and company. A vicinity location map and facility plot plan are included in Appendix A as Figures 1 and 2, respectively. A simplified process flow diagram is included in two sheets as Figures 3 and 4 in Appendix A.

2. PROCESS DESCRIPTION

The Natgasoline Methanol Plant encompasses the 5,500-metric ton per day methanol production unit that synthesizes refined methanol using natural gas feedstock and water. Within this application, an “Emission Unit” (EU) is understood to mean a stationary source of regulated air pollutants that is subject or potentially subject to at least one “applicable requirement” as defined in 30 TAC §122.10. Two emission units that relate to the entire methanol process are summarized as follows:

1. The methanol process is identified in this application as EU “PRO-MEOH.”
2. The collection of valves, pumps, flanges, and other piping equipment components (i.e., with potential “fugitive equipment leaks”) associated with the methanol process is identified as EU “FUG-MEOH.”

Other emission units associated with this project include an auxiliary boiler, plant flare, cooling water tower, storage tanks, methanol scrubber and other equipment as discussed below.

2.1 Natural Gas Feed Processing

Sweet, pipeline-quality natural gas is supplied to the methanol plant via pipeline to a natural gas compressor. A portion of the natural gas received by the site is diverted for fuel in combustion units. The majority of the natural gas is processed as feed to the methanol process unit.

Natural gas feed for the methanol plant passes through a series of feed processing steps that consist of process vessels and piping components, and there are no associated emissions points other than potential fugitive equipment leaks. A key objective of the natural gas feed processing system is to prevent any sulfur compounds from reaching sulfur-intolerant downstream catalyst beds in the reforming and methanol synthesis systems discussed below. Following are the most important steps in the natural gas feed processing system:

1. Knockout drum to remove any entrained condensate as a liquid, although this is not expected to occur during normal operation.
2. Pre-heat system to heat the natural gas by process fluid heat exchange.
3. Catalyst-based hydrogenation reactor to convert any organic sulfur compounds (e.g., mercaptans added by the supplier to odorize the gas) into hydrogen sulfide.

4. Adsorber to adsorb hydrogen sulfide out of the gas.
5. Saturation system to saturate the gas with water vapor.

2.2 Methanol Plant Reforming

The natural gas from the feed processing systems described above is mixed with steam and process recycle gas streams from the downstream methanol synthesis system. The mixture of natural gas, steam, and process recycle gas is fed to a pre-reformer reactor with a catalyst bed that converts most of the higher molecular weight hydrocarbons into methane (CH4), hydrogen (H2), and carbon monoxide (CO). The pre-reformer is an enclosed process vessel without any normal emissions except for potential fugitive equipment leaks.

The gas mixture from the pre-reformer (i.e., “pre-reformed” gas) is converted to synthesis gas by combined reforming, which is performed with a combination of steam reforming and auto-thermal reforming as described in Sections 2.2.1 and 2.2.2 below.

2.2.1 Methanol Reformer

Most of the pre-reformed gas mixture is fed to the methanol reformer. The reformer is best described as a gas-fired combustion unit integrated with a chemical reactor. As a combustion unit, the reformer system is designed to fire up to 1,552 MMBtu/hour total of fuel gas, which consists of natural gas and process waste gas. The process combustion service of the reformer (i.e., the reformer furnace) is identified in this application as EU “B-01001.” The combustion exhaust is heated using a natural gas-fired auxiliary burner before being further processed for steam generation and other heat recovery steps. The reformer auxiliary burners and associated steam generation system is identified as EU “B-01002.” The combined reformer furnace and auxiliary burner exhaust gases are routed to a selective catalytic reduction (SCR) system to reduce NOX emissions prior to exhausting to atmosphere.

As a chemical reactor, the reformer contains a catalyst system that converts methane and steam into carbon monoxide and hydrogen (i.e., the endothermic “reforming” reaction). Some of the carbon monoxide reacts with additional steam and form carbon dioxide and additional hydrogen (i.e., the exothermic “shift” reaction). Therefore, the primary chemical reactions in the steam

reformer can be expressed as follows:

- Reforming reaction: $CH_4 + H_2O + Heat \rightleftharpoons CO + 3H_2$
- Shift reaction: $CO + H_2O \rightleftharpoons CO_2 + H_2 + Heat$

The chemical reaction process is entirely enclosed within the steam reformer system, and there are no associated chemical waste gas steams during normal operation, except for potential fugitive equipment leaks (and the above-described fuel combustion exhaust). The steam reformer process effluent contains hydrogen, carbon monoxide, carbon dioxide, unconverted steam, and other gases that are fed to the auto-thermal reformer (ATR) as discussed below.

2.2.2 Auto-Thermal Reformer (ATR)

A portion of the pre-reformed gas mixture is bypassed around the steam reformer and mixed with steam reformer effluent. This mixture is fed to the ATR, along with a stream of pure oxygen, as a secondary catalyst-based reforming step. The ATR does not rely on heat from any external fuel combustion and is based on an entirely different type of reforming process as compared to the above-described steam reformer. The ATR reaction section is an enclosed process without generating waste gases or any air pollutant emissions except for potential fugitive equipment leaks. The primary ATR chemical processes can be expressed as follows:

- Complete methane oxidation reaction: $CH_4 + 2O_2 \rightleftharpoons CO_2 + 2H_2O + Heat$
- Partial methane oxidation reaction: $CH_4 + O_2 \rightleftharpoons CO + H_2 + H_2O + Heat$
- Reforming reaction: $CH_4 + H_2O + Heat \rightleftharpoons CO + 3H_2$
- Shift reaction: $CO + H_2O \rightleftharpoons CO_2 + H_2 + Heat$

The ATR effluent is called “synthesis gas” and consists of hydrogen, carbon monoxide, carbon dioxide, and other gases at precisely controlled concentrations. The synthesis gas is cooled in heat recovery/steam generation processes and then compressed for downstream synthesis. The synthesis gas compression section produces a small and continuous process waste gas stream from the compressor seal system, which is routed to the process flare. In this application, the combination of compressor seal gas and other gases routed to the flare are identified as EU “S-10001VT.”

2.3 Methanol Synthesis

Synthesis gas from the above-described ATR is mixed with additional hydrogen and synthesis recycle gas. This mixture is fed to the methanol synthesis process. The methanol synthesis reactions are exothermic and will take place in two parallel water-cooled methanol reactors followed by a gas-cooled methanol reactor containing a catalyst matrix. The primary chemical reactions can be expressed as follows:

- $CO + 2H_2 \rightarrow CH_3OH$ (methanol)
- CO2 + 3H2 → CH3OH + H2O

The resulting crude methanol liquid is separated from the recycle gas and routed to the methanol distillation unit. The separated crude methanol liquid includes water, liquid impurities, and dissolved gases that are removed in downstream distillation operations. The separated recycle gas is returned to the synthesis reactors for additional conversion to methanol. A small portion is purged and routed to the fuel gas system to maintain the inert gas level.

During startup of the entire methanol plant, synthesis gas that is normally fed to the methanol synthesis process is routed to the process flare for a limited duration (typically about 28 hours per cold startup). The combination of such maintenance, startup, and shut-down (MSS) gases and other gases routed to flare is identified as EU “S-10001VT” in this application. With the exception of this startup operation, the methanol synthesis process is an enclosed process that does not generate any waste gases or air pollutant emissions during normal operation, except for potential fugitive equipment leaks.

2.4 Methanol Distillation

The methanol distillation process separates the methanol from the following key impurities: water, dissolved gases, and other compounds. The crude methanol is purified and partially vaporized in a three-column system as follows:

1. First, the pre-run column removes low boiling by-products and dissolved gases; these gaseous overheads will be routed to the fuel gas system.
2. Next, the pressure column removes water and other higher boiling compounds from

the pre- run column effluent. The overheads from the pressure column are product quality methanol and will also re-boil the atmospheric column.

3. Finally, the atmospheric column removes the methanol product out of the pressure column bottoms by cooling the hot vapor methanol from the top of the pressure column.

During startup of the entire methanol plant, certain distillation process gas streams that are normally routed into the reformer fuel gas system are instead routed to flare for a short duration (typically about twenty-eight hours per cold startup) while the reformer fuel gas composition is slowly adjusted. The combination of such MSS gases and other gases routed to flare is identified as EU “S-10001VT” in this application.

With the exception of this startup operation, the methanol distillation process is an enclosed process that does not generate any waste gases or air pollutant emissions during normal operation, except for potential fugitive equipment leaks. Product methanol storage and loading operations are discussed in Section 2.5 below.

2.5 Storage and Product Loading

Intermediate methanol product from the methanol plant is stored in the onsite methanol storage tank farm before delivery to customers via a pipeline to a nearby storage terminal. The onsite tank farm includes one crude (or off-specification) methanol tank identified as EU “TK-04001” and two methanol “shift” tanks identified as EUs “TK- 04002A/B.” These methanol tanks are all vertical fixed roof tanks with nitrogen blanketing. The nitrogen prevents air intrusion into the tanks. The methanol storage tank vent lines are routed to a water scrubber (D-04001). The scrubber removes methanol vapors from the tank vent gases using water as an absorbent. Spent washing solution, enriched with absorbed methanol, is fed back to the methanol process via the pre-run column feed.

The methanol plant includes a de-inventory slop tank identified as EU “TK-03007.” This is a small, horizontal process vessel that vents to the plant flare, and it receives liquid mixtures of waste and hydrocarbons generated during MSS activities.

In addition to the larger storage tanks discussed above, the facility includes a variety of smaller tanks and vessels that are considered FOP "off-permit" sources in accordance with the TCEQ Form OP- UA3 instructions. For example, small diesel storage tanks for fueling the emergency engines discussed below each have a capacity less than 500 gallons and are therefore considered "off-permit" sources.

2.6 Supporting Operations

Following is a summary of several key utility and other operations that serve to support the methanol plant operations discussed in the sections above.

2.6.1 Fuel Gas System

A small fraction of the pipeline-supplied natural gas is used as pilot fuel for the auxiliary steam boiler and flare. Pure natural gas is the primary fuel for all combustion units during certain startup and shut-down operations. However, the primary fuel for normal operation of the auxiliary boiler and reformer is a blended fuel gas from a single fuel gas system that supports the entire methanol plant.

The fuel gas system blends the fuel gases from the various process units that produce fuel gas, and the fuel gas system also pressurizes the fuel gas and removes any condensable liquids before the blended fuel gas is distributed to the combustion units. Total fuel gas processed in this system is less than the site-wide fuel gas demand during normal operations, and pipeline-supplied natural gas is added as needed to make up the difference between process fuel gas supply and total fuel gas demand. The fuel gas system is an enclosed process that does not produce any waste gases or air pollution emissions during normal operations except for potential fugitive equipment leaks.

2.6.2 Auxiliary Boiler

The auxiliary boiler, identified as EU "B-14001," is designed to fire up to 950 MMBtu/hour of natural gas and/or fuel gas from the fuel gas system. The boiler provides process steam to the

entire methanol plant and the co-located air separation unit. The boiler is constructed with a SCR system to reduce emissions of NO_X.

Steam condensate from various areas in the process units is routed to the boiler as boiler feed water via a de-aerator. Condensate from the reformed gas waste heat system contains traces of dissolved gases, which are removed by the de-aerator.

2.6.3 Cooling Water System

A circulating cooling water system with a cooling water tower identified as EU "T-06001" provides cooling for all gas to methanol process operations. Approximately 9 million gallons per hour of water is circulated through the cooling water tower. The heated water from the process units is returned to the cooling tower risers. The cooling water tower is equipped with mist eliminators and induced air flow fans for each of the ten cells.

2.6.4 Flare System

A stationary process flare with a continuous pilot is identified as EU "S-10001." The main purpose of the flare is to safely manage combustible waste gases generated during planned MSS operations and process upset events. During normal operations, the flare only receives process waste gas from the compressor seal vents, pilot fuel (natural gas), sweep gas, and supplemental natural gas. During planned MSS operations, the flare will also receive various MSS-related waste gas streams. Process upset events are not included in the permit authorization. The combination of MSS gases and all other gases routed to flare is identified as EU "S-10001VT" in this application.

2.6.5 Air Separation Unit

An Air Separation Unit (ASU) is co-located at the site to contractually provide oxygen to the secondary reformer (i.e., the ATR). This unit separates air into its primary components, nitrogen and oxygen using cryogenic separation. The ASU is supplied with steam from the auxiliary boiler. The ASU is located within the plant boundary and is operated from the joint control room. However, the ASU is owned and operated by a separate company that specializes in air

separation. Any emissions from this facility are not part of this permit.

2.6.6 Emergency Engines

The facility includes an emergency generator engine (EU “H-EMG”) and two pump engines for firewater (EUs “H-FWP1” and “H-FWP2”) to respond to utility power outages and emergency situations. All three of these engines are diesel-fired stationary reciprocating internal combustion engines.

During normal facility operations, these three engines are operated for short durations from time to time as needed for maintenance and testing purposes.

2.7 Planned Maintenance, Startup, and Shutdown Activities

Planned MSS activities may occur to ensure the operation of the methanol plant. Such activities will require shutdown of the processes and subsequent start-up to return to normal operations. A common flare at the site controls emissions from planned MSS activities, including combustion of synthesis gas, reformer fuel gas, and/or gases from equipment clearing. Other MSS activities may include maintenance of the storage tanks, including tank degassing and cleaning. Emissions from tank degassing are routed to control using a temporary control device, including but not limited to, a flare, thermal oxidizer, vapor combustor, or reciprocating internal combustion engine.

3. SUPPLEMENTAL APPLICABILITY INFORMATION

This section explains or clarifies selected applicability determinations and FOP application design features as discussed below.

3.1 Grouped Emission Units

As specified in the TCEQ's FOP guidance, emissions units with the same unit attributes and applicable requirements are organized in groups as specified in the Form OP-SUM in Appendix B of this application. Organizing similar units into groups minimizes the amount of redundant information needed in the FOP application and permit documents. Following are the units that are organized into emission unit groups with a brief group description:

- The group identified as "GRP-TKMEOH" is comprised of three methanol storage tank EUs: TK- 04001, TK-04002A, and TK-04002B. All three of these tanks are subject to the same applicable requirements. Vapors from all three tanks will be captured, combined, and routed to a common water scrubber (D-04001) to remove the vapors.
- The diesel tanks are also grouped according to the size of the tank. GRP-TKDSL1 covers diesel tanks between 1,000 to 25,000 gallons, and GRP-TKDSL2 covers tanks less than 1,000 gallons.

3.2 Complex Unit, Attribute, and Applicability Relationships

Several EUs are complicated because of the relationships between the associated equipment configurations, potentially applicable requirements, and FOP application Unit Attribute (UA) forms. The TCEQ's FOP guidance does not specify how these more complex relationships should be addressed in the FOP application. Following is additional information to describe these more complex unit, attribute, and applicability relationships:

- **Reformer Furnace B-01001**: Process furnace applicability and attributes are addressed in form OP-UA5. The unit also receives a regulated fuel gas stream with associated process vent applicability/attributes addressed in form OP-UA15. Combustion exhaust from this unit is routed to atmosphere via the Auxiliary Burner System discussed below.

- **Reformer Auxiliary (Aux) Burners B-01002**: Steam generation applicability and attributes are addressed in form OP-UA6. The unit also receives a regulated fuel gas stream with associated process vent applicability/attributes addressed in form OP-UA15. Exhaust from this unit and the Reformer Furnace discussed above are combined in one stack with a total stack flow that can exceed 100,000 actual cubic feet per minute (ACFM), with associated visible emissions applicability/attributes addressed in form OP-UA15.
- **Auxiliary (Aux) Boiler B-14001**: This is an entirely separate combustion unit from the Reformer Aux Burner System discussed above. For this unit, steam generation applicability and attributes are addressed in form OP-UA6. This unit also receives a regulated fuel gas stream with associated process vent applicability/attributes addressed in form OP-UA15. Exhaust from this unit can exceed 100,000 ACFM and associated visible emissions applicability/attributes are addressed in form OP-UA15.
- **MeOH Flare S-10001 and Process Vent to Flare S-10001VT**: The Process Vent EU represents the entire combined flow of gas from the flare header into the flare. The combined flare vent includes vent gases and natural gas from multiple equipment and activity sources. Potentially applicable requirements for the vent apply at the combined gas stream immediately upstream of the flare, and the associated applicability and attributes are addressed in form OP-UA15. The MeOH Flare EU represents flare combustion and emission control features with associated applicability/attributes addressed in form OP-UA7.

3.3 Consolidated Federal Air Rule Overlaps

The 40 CFR 65 Consolidated Federal Air Rule (CAR) for the Synthetic Organic Chemical Manufacturing Industry is an optional rule that facilities can apply voluntarily to qualifying process vents and certain other EU types. The CAR is an alternative to complying with various subparts under parts 40 CFR 60 and 40 CFR 63 and certain other rules that would otherwise apply to the EU.

Natgasoline has elected to apply the CAR to the combined fuel gas streams burned in the following EUs: a) Reformer Furnace (B-01001), b) Reformer Aux Burners B-01002, and c) Aux Boiler (B-14001). For these EUs, the CAR will provide a simplified set of applicable requirements

that will avoid the complexity and inefficiency associated with a matrix of 40 CFR 60 and 40 CFR 63 subpart requirements that would otherwise apply. The Aux Burner is included, although this unit does not currently have the capability to utilize fuel gas for combustion.

3.4 Compliance Assurance Monitoring

Compliance Assurance Monitoring (CAM) applies to certain air pollution abatement systems based on several criteria related to emission rates, other applicable requirements, and equipment/instrument configuration. These CAM applicability factors, and the CAM compliance options are discussed in the TCEQ's "Compliance Assurance Monitoring" guidance document identified as APDG 5824 and last updated in April 2009.

Natgasoline proposes no changes to the approved CAMs of the 2019 FOP.

3.5 Periodic Monitoring

Natgasoline proposes no changes to the approved PMs of the 2019 FOP.

3.6 Noncompliance

The Natgasoline Methanol Plant submitted a NSR Permit renewal and modification to TCEQ in May 2023. A draft permit was received by Natgasoline on Feb 2, 2024; Natgasoline provided TCEQ with comments to the draft permit on Feb 15, 2024. Included in this FOP permit renewal, Natgasoline has identified several units that are not operating within the current NSR limits. Form OP-ACPS, Application Compliance Plan and Schedule, has been attached to the FOP Permit renewal and details the areas of noncompliance.

The pending NSR permit modification is requesting expanded emission limits for the Methanol Flare (S-10001) during both normal and MSS operations. This will be reflected in both the hourly emission rates and the annual emission limits for CO, NOx, SO2, NH3, Methanol and VOCs. In addition, the corresponding CO2 emissions will be increased, as well. Expanded emissions and operating limits have also been requested for the Reformer (B-01001) and the Auxiliary Boiler (B-14001).

EPN Unit F-03007 Slop Tank is currently classified as a fixed storage tank venting to the atmosphere, whereas the Slop Tank is actually a process vessel that vents to the Methanol Flare (S-10001). Natgasoline has provided TCEQ with comments on the draft permit that include these modifications and remove permit conditions restricting its hours of operation and limitations on the throughput and fill rates.

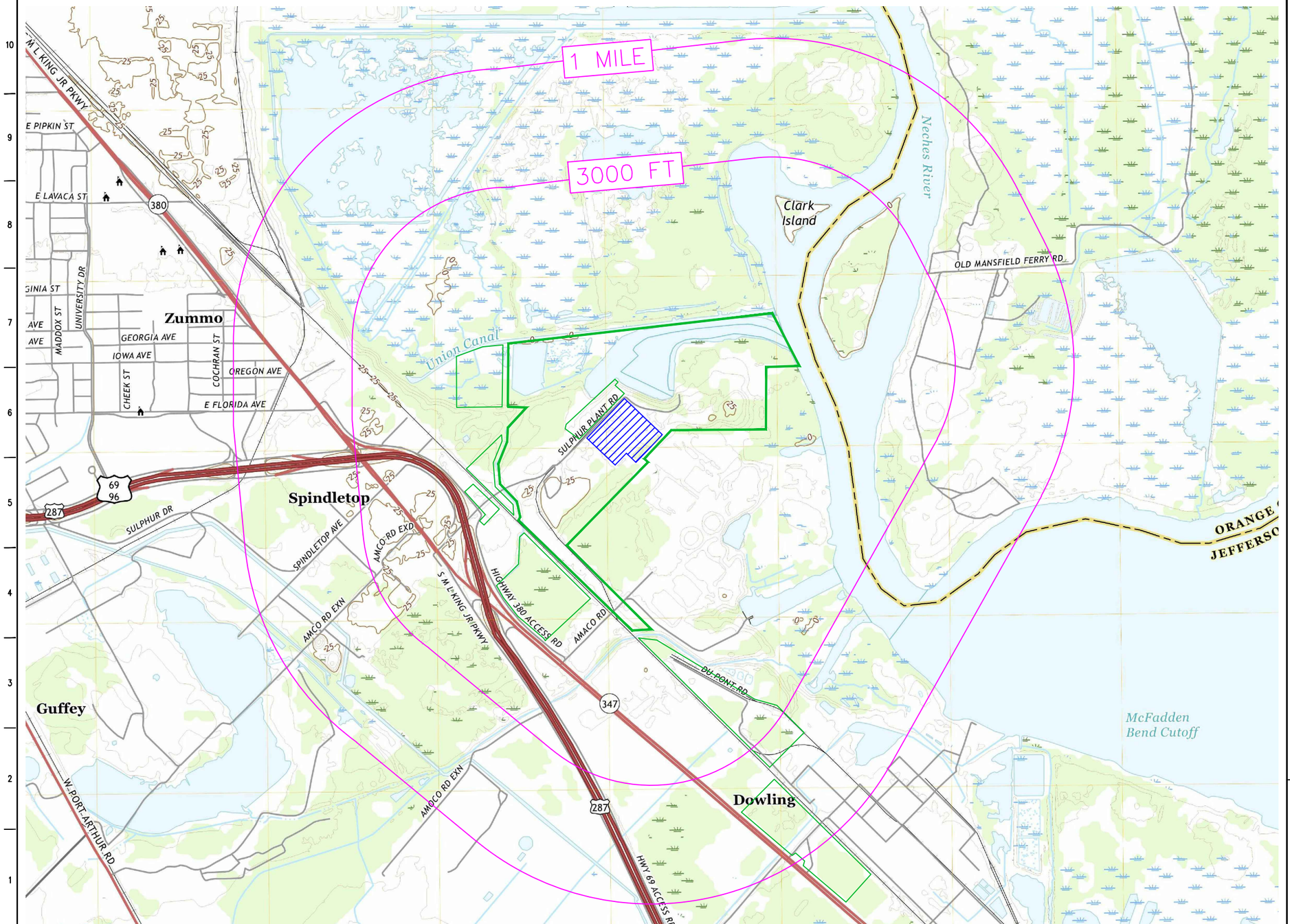
4.0 APPLICATION FORMS

The following TCEQ application forms are included in the appendices to this renewal application:

- **Appendix B – General Forms:**
  - OP-1, Site Information Summary;
  - OP-2, Application for Permit Revision/Renewal;
  - OP-ACPS, Application Compliance Plan and Schedule; and
- **Appendix C – Summary Forms:**
  - OP-SUMR, Individual Unit Summary for Revisions, and
  - TCEQ-20648 Form, Major NSR Summary Table.
- **Appendix D – Unit Attribute Forms:**
  - OP-UA1, Miscellaneous Unit Attributes;
  - OP-UA2, Stationary Reciprocating Internal Combustions Engines;
  - OP-UA3, Storage Tank/Vessels;
  - OP-UA5, Process Heater/Furnaces;
  - OP-UA6, Boiler/Steam Generator/Steam Generating Units;
  - OP-UA7, Flares;
  - OP-UA12, Fugitive Emission Units;
  - OP-UA15, Emission Point/Stationary Vent/Distillation/Process Vents;
  - OP-UA17, Distillation Unit Attributes;
  - OP-UA48, Reactor Attributes; and
  - OP-UA60, Chemical Manufacturing Process Units.
- **Appendix E – Applicability and Requirements Forms:**
  - OP-REQ1, Area-Wide Applicability Determinations/General Information;
  - OP-REQ2, Negative Applicable Requirements Determinations; and
  - OP-REQ3, Applicable Requirements Summary.
  - OP-MON, Monitoring Requirements
  - OP-PBRSUP, Permit By Rule Supplemental Table

APPENDIX A

FIGURES



N

LEGEND:

- OFFSET FROM PROPERTY LINE
- NATGASOLINE, LLC PROPERTY LINE
- NATGASOLINE, LLC PROCESS AREA

GRAPHICAL SCALE

500 0 500 1000 2000

IN FEET

NOTES:
1. BACKGROUND FROM 2019 USGS 24K TOPOGRAPHIC MAP – BEAUMONT EAST.

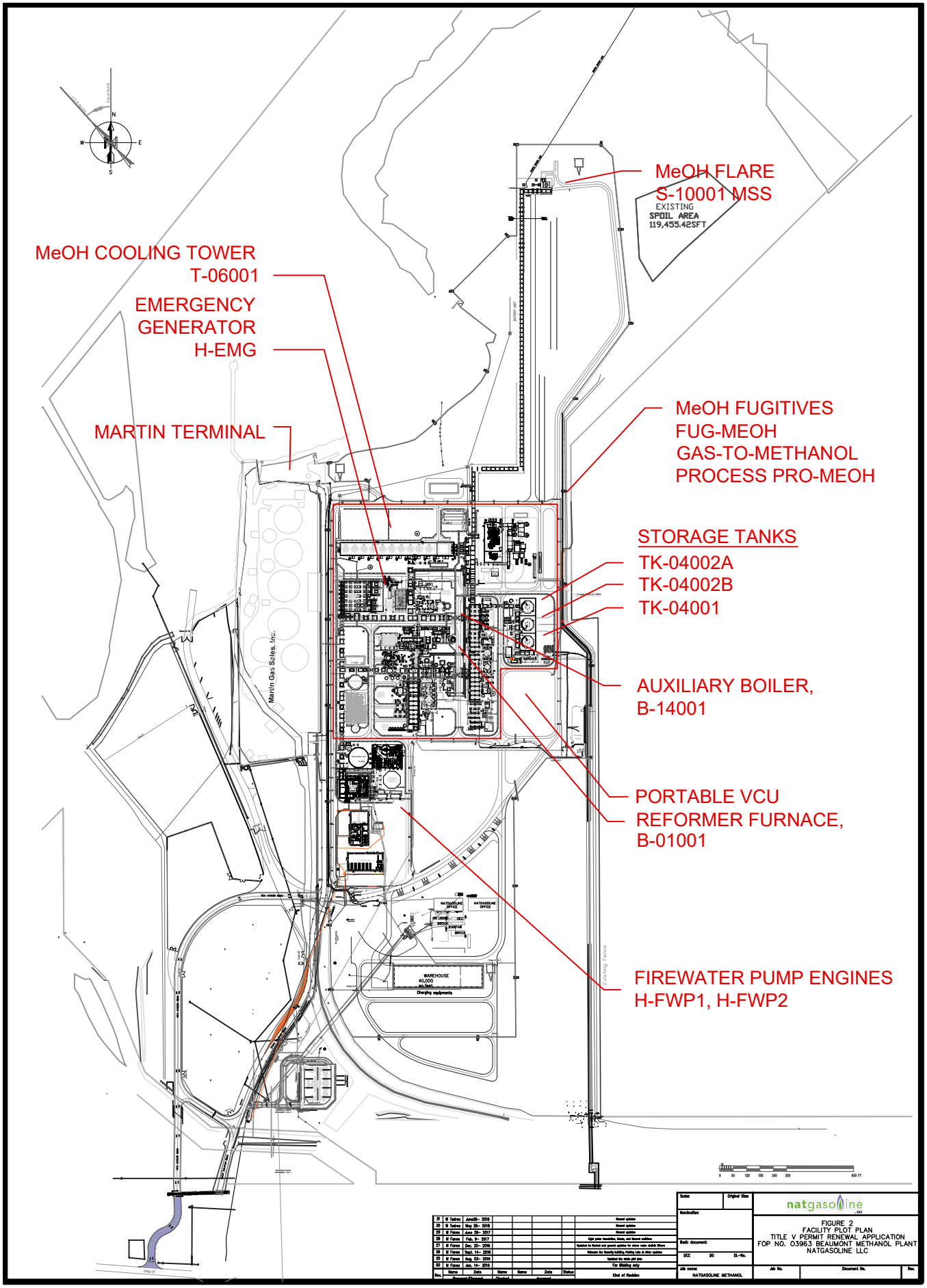
COMPLIANCE SOLUTIONS CSG GROUP

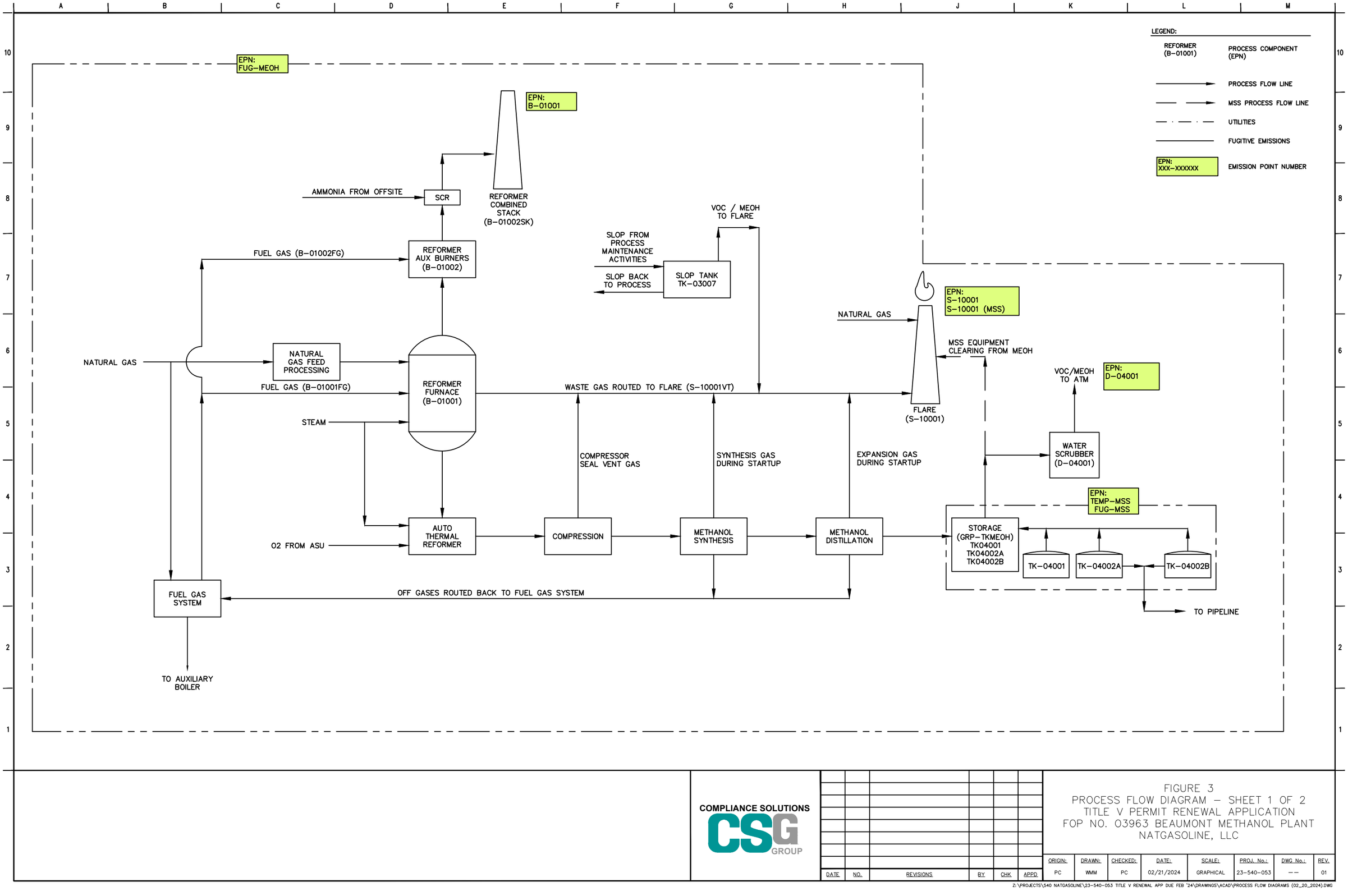
DATE	NO.	REVISIONS	BY	CHK	APPD

FIGURE 1
VICINITY LOCATION MAP
TITLE V PERMIT RENEWAL APPLICATION
FOP NO. O3963 BEAUMONT METHANOL PLANT
NATGASOLINE, LLC

ORIGIN:	DRAWN:	CHECKED:	DATE:	SCALE:	PROJ. No.:	DWG No.:	REV.
PC	WMM	PC	02/21/2024	GRAPHICAL	23-540-053	--	01

Z:\PROJECTS\540 NATGASOLINE\23-540-053 TITLE V RENEWAL APP DUE FEB '24\DRAWINGS\ACAD\VICINITY MAP REV 1.0 (02_21_2024).DWG


MeOH FLARE
S-10001 MSS
EXISTING
SPOIL AREA
119,455.42SFT
MeOH COOLING TOWER
T-06001
EMERGENCY
GENERATOR
H-EMG
MARTIN TERMINAL
MeOH FUGITIVES
FUG-MEOH
GAS-TO-METHANOL
PROCESS PRO-MEOH
STORAGE TANKS
TK-04002A
TK-04002B
TK-04001
AUXILIARY BOILER,
B-14001
PORTABLE VCU
REFORMER FURNACE,
B-01001
FIREWATER PUMP ENGINES
H-FWP1, H-FWP2
Martin Gas Sales, Inc.
WAREHOUSE
40,000
Charging equipments
natgasoline
FIGURE 2
FACILITY PLOT PLAN
TITLE V PERMIT RENEWAL APPLICATION
FOP NO. 03963 BEAUMONT METHANOL PLANT
NATGASOLINE LLC
NATGASOLINE METHANOL



COMPLIANCE SOLUTIONS CSG GROUP

DATE	NO.	REVISIONS	BY	CHK	APPD

FIGURE 3
PROCESS FLOW DIAGRAM – SHEET 1 OF 2
TITLE V PERMIT RENEWAL APPLICATION
FOP NO. 03963 BEAUMONT METHANOL PLANT
NATGASOLINE, LLC

ORIGIN:	DRAWN:	CHECKED:	DATE:	SCALE:	PROJ. No.:	DWG No.:	REV.
PC	WMM	PC	02/21/2024	GRAPHICAL	23-540-053	--	01

Z:\PROJECTS\540 NATGASOLINE\23-540-053 TITLE V RENEWAL APP DUE FEB '24\DRAWINGS\ACAD\PROCESS FLOW DIAGRAMS (02_20_2024).DWG

LEGEND:

REFORMER (B–01001) — PROCESS COMPONENT (EPN)

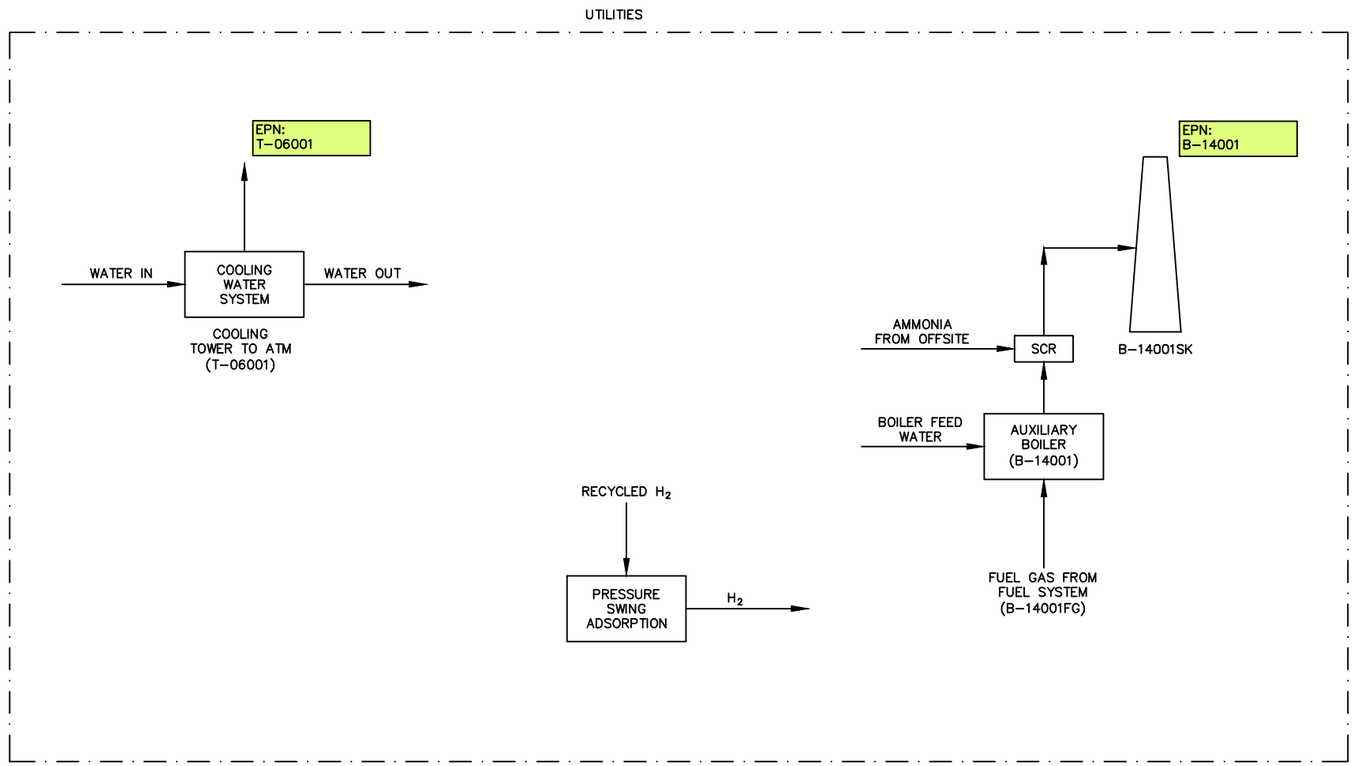
PROCESS FLOW LINE

MSS PROCESS FLOW LINE

UTILITIES

FUGITIVE EMISSIONS

EPN: XXX–XXXXXX — EMISSION POINT NUMBER



*AIR LIQUIDE (ASU) IS CO–LOCATED WITH THE METHANOL PLANT.

COMPLIANCE SOLUTIONS CSG GROUP

DATE	NO.	REVISIONS	BY	CHK	APPD

FIGURE 4
PROCESS FLOW DIAGRAM – SHEET 2 OF 2
TITLE V PERMIT RENEWAL APPLICATION
FOP NO.03963 BEAUMONT METHANOL PLANT
NATGASOLINE, LLC

ORIGIN:	DRAWN:	CHECKED:	DATE:	SCALE:	PROJ. No.:	DWG No.:	REV.
PC	WMM	PC	02/21/24	GRAPHICAL	23–540–053	––	01

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APPENDIX B

GENERAL FORMS

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: Natgasoline LLC
B.	Customer Reference Number (CN): **CN 604256412**
C.	Submittal Date *(mm/dd/yyyy):* 02/21/2024
II.	**Site Information**
A.	Site Name: Methanol Plant
B.	Regulated Entity Reference Number (RN): **RN 106586795**
C.	Indicate affected state(s) required to review permit application: *(Check the appropriate box[es].)*
☐ AR ☐ CO ☐ KS ☐ LA ☐ NM ☐ OK ☒ N/A	
D.	Indicate all pollutants for which the site is a major source based on the site's potential to emit: *(Check the appropriate box[es].)*
☐ VOC ☒ NO_X ☐ SO_2 ☐ PM_{10} ☒ CO ☐ Pb ☒ HAPS	
Other:	
E.	Is the site a non-major source subject to the Federal Operating Permit Program? ☐ YES ☒ NO
F.	Is the site within a local program area jurisdiction? ☐ YES ☒ NO
G.	Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? ☐ YES ☒ NO
H.	Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging: NA
III.	**Permit Type**
A.	Type of Permit Requested: *(Select only one response)*
☒ Site Operating Permit (SOP) ☐ Temporary Operating Permit (TOP) ☐ 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** *(Complete for Initial Issuance Applications Only.)*	
A.	Is this submittal an abbreviated or a full application?	☐ Abbreviated ☐ Full
B.	If this is a full application, is the submittal a follow-up to an abbreviated application?	☐ YES ☐ NO
C.	If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit?	☐ YES ☐ 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.)	☐ YES ☐ NO
E.	Has the required Public Involvement Plan been included with this application?	☐ YES ☐ NO
V.	**Confidential Information**	
A.	Is confidential information submitted in conjunction with this application?	☐ YES ☒ NO
VI.	**Responsible Official (RO) Identifying Information**	
RO Name Prefix: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)		
RO Full Name: Larry Richard		
RO Title: Plant Manager		
Employer Name: Natgasoline LLC		
Mailing Address: P.O. Box 20339		
City: Beaumont		
State: TX		
ZIP Code: 77720		
Territory:		
Country: USA		
Foreign Postal Code:		
Internal Mail Code:		
Telephone No.: 409-344-4900		
Fax No.:		
Email: larry.richard@natgasoline.com		

Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 3)
Texas Commission on Environmental Quality

VII. Technical Contact Identifying Information *(Complete if different from RO.)*	
Technical Contact Name Prefix: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)	
Technical Contact Full Name: Miguel A. Martinez	
Technical Contact Title: Environmental Manager	
Employer Name: Natgasoline LLC	
Mailing Address: P.O. Bo 20339	
City: Beaumont	
State: TX	
ZIP Code: 77720	
Territory:	
Country: USA	
Foreign Postal Code:	
Internal Mail Code:	
Telephone No.: 409-344-4974	
Fax No.:	
Email: Miguel.martinez@natgasoline.com	
VIII. Reference Only Requirements *(For reference only.)*	
A. State Senator: Brandon Creighton	
B. State Representative: Dade Phelan	
C. Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)?	☒ YES ☐ NO ☐ N/A
D. Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322?	☒ YES ☐ NO
E. Indicate the alternate language(s) in which public notice is required:	

Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 4)
Texas Commission on Environmental Quality

IX.	**Off-Site Permit Request** *(Optional for applicants requesting to hold the FOP and records at an off-site location.)*
A.	Office/Facility Name:
B.	Physical Address:
City:	
State:	
ZIP Code:	
Territory:	
Country:	
Foreign Postal Code:	
C.	Physical Location:
D.	Contact Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
Contact Full Name:	
E.	Telephone No.:
X.	**Application Area Information**
A.	Area Name: Natgasoline Methanol Plant
B.	Physical Address: 2366 Sulphur Plant Road
City: Beaumont	
State: TX	
ZIP Code: 77705	
C.	Physical Location:
Same as X.A	
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 *(continued)***
G.	Latitude (nearest second): 30° 0' 44"
H.	Longitude (nearest second): -94° 2' 11"
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? ☒ YES ☐ NO
J.	Indicate the estimated number of emission units in the application area: 12
K.	Are there any emission units in the application area subject to the Acid Rain Program? ☐ YES ☒ NO
XI.	**Public Notice** *(Complete this section for SOP Applications and Acid Rain Permit Applications only.)*
A.	Name of a public place to view application and draft permit: Beaumont Public Library
B.	Physical Address: 801 Pearl Street
City: Beaumont	
ZIP Code: 77701	
C.	Contact Person (Someone who will answer questions from the public during the public notice period):
Contact Name Prefix: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.):	
Contact Person Full Name: Miguel A. Martinez	
Contact Mailing Address: P.O. Box 20339	
City: Beaumont	
State: Texas	
ZIP Code: 77720	
Territory:	
Country: USA	
Foreign Postal Code:	
Internal Mail Code:	
Telephone No.: 409-344-4974	

Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 6)
Texas Commission on Environmental Quality

XII. 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 Attorney General on behalf of the TCEQ are paid in accordance with the "Delinquent Fee and Penalty Protocol."
Complete Sections XIII and XIV for Acid Rain Permit and CSAPR applications only. Please include a copy of the Certificate of Representation submitted to EPA.
XIII. Designated Representative (DR) Identifying Information
DR Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
DR Full Name:
DR Title:
Employer Name:
Mailing Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.:
Fax No.:
Email:

Complete Sections XIII and XIV for Acid Rain Permit and CSAPR applications only. Please include a copy of the Certificate of Representation submitted to EPA.
XIV. Alternate Designated Representative (ADR) Identifying Information
ADR Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
ADR Full Name:
ADR Title:
Employer Name:
Mailing Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.:
Fax No.:
Email:

Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1
Texas Commission on Environmental Quality

Date: 2/21/2024	
Permit No.: O3963	
Regulated Entity No.: RN106586795	
Company Name: Natgasoline LLC	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA?	☒ YES ☐ NO
I. Application Type	
Indicate the type of application:	
☒ Renewal	
☐ Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
☐ Significant Revision	
☐ Revision Requesting Prior Approval	
☐ Administrative Revision	
☐ Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only	☒ YES ☐ NO
For GOP Revisions Only	☐ YES ☐ 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].)*						
☐ VOC	☒ NO_X	☐ SO_2	☐ PM_{10}	☒ CO	☐ Pb	☒ 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)?				☒ YES	☐ NO	☐ 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: 2/21/2024
Permit No.: O3963
Regulated Entity No.: RN106586795
Company Name: Natgasoline LLC

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	SIG-C	YES	TANKVCUN	OP-UA01	174371	Added natural gas portable VCU
2	SIG-C	YES	TANKVCUP	OP-UA01	174371	Added propane portable VCU
3	ADMIN-G	NO	B-01001, B-14001	OP-UA06 OP-UA01 OP-UA05	107764	AMOC for ammonia analyzer on stacks
4	SIG-C	NO	TK-03007	OP-UA3	107764	Natgasoline is proposing to remove EPN No. TK-03007 in the renewal and modification to the NSR Permit 107764. The draft NSR permit was received by Natgasoline on Feb 2, 2024. Natgasoline in comments on the draft submitted to TCEQ on February 15, 2024 proposed to reclassify TK-03007 as a process vessel and remove throughput, fill rate, and hours of operation requirements.

5	SIG-C	NO	F-10001	NONE	107764	Under the Flare Design and Operations in the draft NSR, Natgasoline proposes revising Special Condition 14.C to remove the condition requiring the 1:4 ratio of supplemental gas to waste gas. The Methanol Flare is bound by SC.12.A, which references 40CFR 60.18 and requires that the vent gas to the flare is maintained above the 200 BTU/scf for un-assisted flares. This 1:4 requirement significantly increases flare emissions. These increased emissions associated with combustion go against our MAERT limits, as well as requires reporting of these excessive emissions under various emission reporting requirements.
6	SIG-C	NO	D-04001	NONE	107764	During Methanol Plant shutdowns, the methanol storage tank emissions may be routed to a temporary VCU, in accordance with the Natgasoline Standard Permit 174371. Natgasoline proposed that the 13 gpm minimum scrubber flow requirement will not apply during this period. In addition, Natgasoline proposes to add this activity to the MSS Activity Summary Table - Attachment A in the NSR Permit.

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

Date: 2/21/2024		
Permit No.: O3963		
Regulated Entity No.: RN106586795		
Company Name: Natgasoline LLC		
I.	**Significant Revision** *(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)*	
A.	Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322?	☐ YES ☐ NO
B.	Indicate the alternate language(s) in which public notice is required:	
C.	Will, there be a change in air pollutant emissions as a result of the significant revision?	☐ YES ☐ NO

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

Using the table below, indicate the air pollutant(s) that will be changing and include a brief description of the change in pollutant emissions for each pollutant:

Pollutant	Description of the Change in Pollutant Emissions

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	**Regulated Entity No.: RN106586795**	**Permit No.: O3963**
Company Name: Natgasoline LLC		**Area Name: Methanol 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**	
The *Responsible Official* 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.		
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?	☒ YES ☐ NO
2.	Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	☒ YES ☐ NO
3.	If the response to Item B.2, above, is "Yes," indicate the total number of Part 2 attachments included in this submittal. *(For reference only)*	23
*	*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.* *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.*	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	**Regulated Entity No.: RN106586795**	**Permit No.: O3963**
Company Name: Natgasoline LLC		**Area Name: Methanol Plant**

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): TK-03007 Slop Tank

SOP Index No.:

Pollutant: MeOH

Applicable Requirement

Citation	Text Description
SC 12 Storage Tank Throughput	Rolling 12 mo throughput 3,441 bbl;

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
NSR Permit 107764	SC 12	Semi-annual deviation report (SDR) for reporting period 1/1/2023 to 6/30/2023, Item 11

3. Non-compliance Situation Description

Annual tank throughput exceedance; Hours of operation

4. Corrective Action Plan Description

Approval of Air Permit 107764 Revision

5. List of Activities/Milestones to Implement the Corrective Action Plan

NSR Permit modification was submitted in May 2023. Draft permit was received by Natgasoline on February 2, 2024. Natgasoline provided comments on the draft permits to TCEQ on February 15, 2024.

In the response to the draft permit submitted to TCEQ on February 15, 2024 Natgasoline proposes to reclassify the Methanol Slop Tank TK-03007 as a process vessel and remove the throughput, fill rate, and operation hours.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOE of Jan 12, 2024	Ongoing
7. Progress Report Submission Schedule	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): S-10001 Methanol Flare

SOP Index No.: R1111, 63A

Pollutant: NOX

Applicable Requirement

Citation	Text Description
NSR Permit 107764	MAERT of June 2020

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
NSR Permit 107764	MAERT	Semi-annual deviation report (SDR) for reporting period 1/1/2023 to 6/30/2023, Item 18

3. Non-compliance Situation Description

Annual emissions exceedance

4. Corrective Action Plan Description

Approval of Air Permit 107764 Revision

5. List of Activities/Milestones to Implement the Corrective Action Plan

NSR Permit modification was submitted in May 2023. Draft permit was received by Natgasoline on February 2, 2024. Natgasoline provided comments on the draft permits to TCEQ on February 15, 2024.

AQA modeling report was reviewed and approved by TCEQ December 2023.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOV of 1/12/2024 & 2/24/2023	4/12/2023
7. Progress Report Submission Schedule	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): S-10001 Methanol Flare

SOP Index No.: R1111, 63A

Pollutant: CO

Applicable Requirement

Citation	Text Description
NSR Permit 107764	MAERT of June 2020

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
NSR Permit 107764	MAERT	Semi-annual deviation report (SDR) for reporting period 1/1/2023 to 6/30/2023, Item 19

3. Non-compliance Situation Description

Annual emissions exceedance

4. Corrective Action Plan Description

Approval of Air Permit 107764 Revision

5. List of Activities/Milestones to Implement the Corrective Action Plan

NSR Permit modification was submitted in May 2023. Draft permit was received by Natgasoline on February 2, 2024. Natgasoline provided comments on the draft permits to TCEQ on February 15, 2024.

AQA modeling report was reviewed and approved by TCEQ December 2023.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOV of 1/12/2024 & 2/24/2023	4/12/2023
7. Progress Report Submission Schedule	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): S-10001 Methanol Flare

SOP Index No.: R1111, 63A

Pollutant: VOC

Applicable Requirement

Citation	Text Description
NSR Permit 107764	MAERT of June 2020

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
NSR Permit 107764	MAERT	Semi-annual deviation report (SDR) for reporting period 1/1/2023 to 6/30/2023, Item 20

3. Non-compliance Situation Description

Annual emissions exceedance

4. Corrective Action Plan Description

Approval of Air Permit 107764 Revision

5. List of Activities/Milestones to Implement the Corrective Action Plan

NSR Permit modification was submitted in May 2023. Draft permit was received by Natgasoline on February 2, 2024. Natgasoline provided comments on the draft permits to TCEQ on February 15, 2024.

AQA modeling report was reviewed and approved by TCEQ December 2023.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOV of 1/12/2024 & 2/24/2023	4/12/2023
7. Progress Report Submission Schedule	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): S-10001 Methanol Flare

SOP Index No.: R1111, 63A

Pollutant: MeOH

Applicable Requirement

Citation	Text Description
NSR Permit 107764	MAERT of June 2020

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
NSR Permit 107764	MAERT	Semi-annual deviation report (SDR) for reporting period 1/1/2023 to 6/30/2023, Item 21

3. Non-compliance Situation Description

Annual emissions exceedance

4. Corrective Action Plan Description

Approval of Air Permit 107764 Revision

5. List of Activities/Milestones to Implement the Corrective Action Plan

NSR Permit modification was submitted in May 2023. Draft permit was received by Natgasoline on February 2, 2024. Natgasoline provided comments on the draft permits to TCEQ on February 15, 2024.

AQA modeling report was reviewed and approved by TCEQ December 2023.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOV of 1/12/2024 & 2/24/2023	4/12/2023
7. Progress Report Submission Schedule	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): S-10001 Methanol Flare

SOP Index No.: R1111, 63A

Pollutant: NOX

Applicable Requirement

Citation	Text Description
NSR Permit 107764	MAERT of June 2020

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
NSR Permit 107764	MAERT	Semi-annual deviation report (SDR) for reporting period 1/1/2023 to 6/30/2023, Item 22

3. Non-compliance Situation Description

Lb/hr exceedance

4. Corrective Action Plan Description

Approval of Air Permit 107764 Revision

5. List of Activities/Milestones to Implement the Corrective Action Plan

NSR Permit modification was submitted in May 2023. Draft permit was received by Natgasoline on February 2, 2024. Natgasoline provided comments on the draft permits to TCEQ on February 15, 2024.

AQA modeling report was reviewed and approved by TCEQ December 2023.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOV of 1/12/2024 & 2/24/2023	4/12/2023
7. Progress Report Submission Schedule	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): S-10001 Methanol Flare

SOP Index No.: R1111, 63A

Pollutant: CO

Applicable Requirement

Citation	Text Description
NSR Permit 107764	MAERT of June 2020

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
NSR Permit 107764	MAERT	Semi-annual deviation report (SDR) for reporting period 1/1/2023 to 6/30/2023, Item 22

3. Non-compliance Situation Description

Lb/hr exceedance

4. Corrective Action Plan Description

Approval of Air Permit 107764 Revision

5. List of Activities/Milestones to Implement the Corrective Action Plan

NSR Permit modification was submitted in May 2023. Draft permit was received by Natgasoline on February 2, 2024. Natgasoline provided comments on the draft permits to TCEQ on February 15, 2024.

AQA modeling report was reviewed and approved by TCEQ December 2023.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOV of 1/12/2024 & 2/24/2023	4/12/2023
7. Progress Report Submission Schedule	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): S-10001 Methanol Flare

SOP Index No.: R1111, 63A

Pollutant: VOC

Applicable Requirement

Citation	Text Description
NSR Permit 107764	MAERT of June 2020

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
NSR Permit 107764	MAERT	Semi-annual deviation report (SDR) reporting period 1/1/2023 to 6/30/2023, Item 22

3. Non-compliance Situation Description

Lb/hr exceedance

4. Corrective Action Plan Description

Approval of Air Permit 107764 Revision

5. List of Activities/Milestones to Implement the Corrective Action Plan

NSR Permit modification was submitted in May 2023. Draft permit was received by Natgasoline on February 2, 2024. Natgasoline provided comments on the draft permits to TCEQ on February 15, 2024.

AQA modeling report was reviewed and approved by TCEQ December 2023.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOV of 1/12/2024 & 2/24/2023	4/12/2023
7. Progress Report Submission Schedule	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): S-10001 Methanol Flare

SOP Index No.: R1111, 63A

Pollutant: MeOH

Applicable Requirement

Citation	Text Description
NSR Permit 107764	MAERT of June 2020

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
NSR Permit 107764	MAERT	Semi-annual deviation report (SDR) reporting period 1/1/2023 to 6/30/2023, Item 22

3. Non-compliance Situation Description

Lb/hr exceedance

4. Corrective Action Plan Description

Approval of Air Permit 107764 Revision

5. List of Activities/Milestones to Implement the Corrective Action Plan

NSR Permit modification was submitted in May 2023. Draft permit was received by Natgasoline on February 2, 2024. Natgasoline provided comments on the draft permits to TCEQ on February 15, 2024.

AQA modeling report was reviewed and approved by TCEQ December 2023.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 1/11/2024	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOV of 1/12/2024 & 2/24/2023	4/12/2023
7. Progress Report Submission Schedule	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): S-10001 Methanol Flare

SOP Index No.:

Pollutant:

Applicable Requirement

Citation	Text Description
NSR Permit 107764, SC 14.C	A minimum of one cubic foot of supplemental gas will be supplied for every four cubic feet of waste gas during normal flare operations and tank clearing activities.

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
NSR Permit 107764, SC 14.C	Process data analysis	Semi-annual deviation report (SDR) for reporting period 7/1/2023 to 12/31/2023, Item 29

3. Non-compliance Situation Description

Methanol Flare failed to maintain a ratio of 1 cubic foot of supplemental gas to every four cubic feet of waste gas.

4. Corrective Action Plan Description

Revise the NSR Permit 107764 to control the flare using the 200 BTU/scf requirement in SC 14.A, and eliminate or revise SC 14.C.

Based on investigation of the deviations it was determined that while the 1:4 ratio was not met, the net heating value of the vent stream leading to the flare was above the minimum permit limit of 200 BTU/scf. The 1:4 ratio will cause unnecessary excess emission.

A permit modification was resubmitted in May 2023 to reflect actual flare normal emissions. A draft permit was received from TCEQ on February 2, 2024. Comments on draft permit were submitted to TCEQ on February 15, 2024. The draft permit request that the 1:4 ratio be replaced with calorimetric conditions that are already identified in the permit.

5. List of Activities/Milestones to Implement the Corrective Action Plan

NSR Permit modification was submitted in May 2023. Draft permit was received by Natgasoline on February

2, 2024. Natgasoline provided comments on the draft permits to TCEQ on February 15, 2024.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOV of 2/24/2023, 1936666	Ongoing
7. Progress Report Submission Schedule	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): D-04001 Methanol Scrubber

SOP Index No.:

Pollutant:

Applicable Requirement

Citation	Text Description
NSR Permit 107764, SC 17A	Minimum liquid flow to D-04001 shall be 13 GPM.

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
NSR Permit 107764, SC 17A	Circulation rate recorded once per hour	Semi-annual deviation report (SDR) for reporting period 1/1/2023 to 6/30/2023, Item 16

3. Non-compliance Situation Description

Scrubber circulation rate drops below 13 GPM.

4. Corrective Action Plan Description

NSR Permit Modification submitted May 2023

5. List of Activities/Milestones to Implement the Corrective Action Plan

Received approval of Standard Permit for portable VCU, Registration 174371, to operate when plant is down.

Adjust NSR permit language for the D-04001 Scrubber to allow for MSS activity when the plant is down.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOV of 1/12/2024 & 2/28/2022	3/22/2021, 2/28/2022
7. Progress Report Submission Schedule	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): B-01001 Reformer

SOP Index No.:

Pollutant:

Applicable Requirement

Citation	Text Description
NSR Permit 107764, SC 9	SCR startup period exceeds 24 hours on a 12-month
	rolling average.

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
SC 28 planned MSS activities	Process data analysis	Semi-annual deviation report (SDR) for reporting period 1/1/2023 to 6/30/2023, Item 1

3. Non-compliance Situation Description

SCR startup hours exceed 24 hours on a 12-month rolling average

4. Corrective Action Plan Description

NSR permit modification to increase SCR startup period to 220 hours.

5. List of Activities/Milestones to Implement the Corrective Action Plan

NSR Permit modification was submitted in May 2023. Draft permit was received by Natgasoline on February 2, 2024. Natgasoline provided comments on the draft permit to TCEQ on February 15, 2024.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
SCR startup period has been extended in the NSR Permit modification of May 2023.	May 2023
7. Progress Report Submission Schedule	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): B-14001 Auxiliary Boiler

SOP Index No.:

Pollutant:

Applicable Requirement

Citation	Text Description
NSR Permit 107764, SC 9	SCR startup period exceeds 24 hours on a 12-month
	rolling average.

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
SC 28 planned MSS activities	Process data analysis	Semi-annual deviation report (SDR) for reporting period 1/1/2023 to 6/30/2023, Item 7

3. Non-compliance Situation Description

SCR startup hours exceed 24 hours on a 12-month rolling average

4. Corrective Action Plan Description

NSR permit modification to increase SCR startup period to 180 hours.

5. List of Activities/Milestones to Implement the Corrective Action Plan

NSR Permit modification was submitted in May 2023. Draft permit was received by Natgasoline on February 2, 2024. Natgasoline provided comments on the draft permit to TCEQ on February 15, 2024.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
SCR startup period has been extended in the NSR Permit modification of May 2023.	May 2023
7. Progress Report Submission Schedule	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): B-01001 Reformer

SOP Index No.:

Pollutant: NH_3

Applicable Requirement

Citation	Text Description
NSR Permit 107764, SC 8C	Limit shall not exceed 10 PPMVD NH_3
	corrected to 3% O2 on an hourly average

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
SC 24 CEMS monitoring	Process data analysis	Semi-annual deviation report (SDR) for reporting period 1/1/2023 to 6/30/2023, Item 3

3. Non-compliance Situation Description

NH_3 emissions exceeded 10 PPMVD in reformer stack

4. Corrective Action Plan Description

Natgasoline has initiated a Root Cause Analysis (RCA) No.22-03-07 022 to determine the root cause of the NH3 exceedances.

5. List of Activities/Milestones to Implement the Corrective Action Plan

Upon completion of RCA, Natgasoline will implement the findings and recommendations developed during RCA.

During a planned plant turnaround in September 2022, it was found that the selective catalytic reduction (SCR) was plugged which caused the ammonia concentration to increase. The SCR was cleaned and the performance improved immediately.

An ongoing investigation (RCA) is being conducted to further determine causes of the high ammonia. An ongoing investigation is being conducted to determine further improvements to the performance and reliability of the TDL.

The original permit did not truly represent actual operating conditions. A permit modification was resubmitted in May 2023 to reflect the hydrogen rich process fuel gas stream in the Steam Methane Reformer (SMR). The NOx energy limits were adjusted to 0.015 lb NOx/MMBtu to reflect the higher NOx energy in the reformer.

The draft permit was received from the TCEQ on February 2, 2024. Natgasoline's comments on the draft permit were

Part 2

A. Compliance Schedule
submitted to the TCEQ on February 15, 2024.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOV of 1/12/2024 & 2/28/2022	2/28/2022
7. Progress Report Submission Schedule	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): B-01001 Reformer

SOP Index No.:

Pollutant: NO_X

Applicable Requirement

Citation	Text Description
NSR Permit 107764, SC 8A	Limit shall not exceed 0.01 lb NO_X/MMBtu
	on an hourly average

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
SC 24 CEMS monitoring	Process data analysis	Semi-annual deviation report (SDR) for reporting period 1/1/2023 to 6/30/2023, Item 2

3. Non-compliance Situation Description

NO_X energy in lbs NO_X/MMBtu exceeded 0.01 lb/MMBtu limit

4. Corrective Action Plan Description

NSR permit modification requests a 0.015 lb/MMBtu limit.

5. List of Activities/Milestones to Implement the Corrective Action Plan

NSR Permit modification was submitted in May 2023. Draft permit was received by Natgasoline on February 2, 2024. Natgasoline provided comments on the draft permits to TCEQ on February 15, 2024.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOV of 1/12/2024 & 2/28/2022	2/28/2022
7. Progress Report Submission Schedule	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): B-14001 Auxiliary Boiler

SOP Index No.:

Pollutant: NO_X

Applicable Requirement

Citation	Text Description
NSR Permit 107764, SC 8A	Limit shall not exceed 0.01 lb NO_X/MMBtu
	on an hourly average

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
SC 24 CEMS monitoring	Process data analysis	Semi-annual deviation report (SDR) for reporting period 1/1/2023 to 6/30/2023, Item 8

3. Non-compliance Situation Description

NO_X energy in lbs NO_X/MMBtu exceeded 0.01 lb/MMBtu limit

4. Corrective Action Plan Description

NSR permit modification requests an allowance of 0.015 lb/MMBtu.

5. List of Activities/Milestones to Implement the Corrective Action Plan

NSR Permit modification was submitted in May 2023. Draft permit was received by Natgasoline on February 2, 2024. Natgasoline provided comments on the draft permits to TCEQ on February 15, 2024.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOV of 1/12/2024 & 2/28/2022	2/28/2022
7. Progress Report Submission Schedule	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): B-01001 Reformer

SOP Index No.:

Pollutant: NO_X

Applicable Requirement

Citation	Text Description
NSR Permit 107764 MAERT	Permitted emissions

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
MAERT exceedance	lb/hr limit	Semi-annual deviation report (SDR) for reporting period 1/1/2023 to 6/30/2023, Item 5

3. Non-compliance Situation Description

Permit exceedance in lb/hr

4. Corrective Action Plan Description

NSR permit modification has requested an increase in the MAERT for lb/hr of NOx.

5. List of Activities/Milestones to Implement the Corrective Action Plan

NSR Permit modification was submitted in May 2023. Draft permit was received by Natgasoline on February 2, 2024. Natgasoline provided comments on the draft permits to TCEQ on February 15, 2024.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOV of 1/12/2024 & 2/28/2022	2/28/2022
7. Progress Report Submission Schedule	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): B-14001 Aux Boiler

SOP Index No.:

Pollutant: NO_X

Applicable Requirement

Citation	Text Description
NSR Permit 107764 MAERT	Permitted emissions

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
MAERT exceedance	lb/hr limit	Semi-annual deviation report (SDR) for reporting period 7/1/2023 to 12/31/2023, Item 12

3. Non-compliance Situation Description

Permit exceedance in lb/hr

4. Corrective Action Plan Description

NSR permit modification has requested an increase in the MAERT for lb/hr of NOx.

5. List of Activities/Milestones to Implement the Corrective Action Plan

NSR Permit modification was submitted in May 2023. Draft permit was received by Natgasoline on February 2, 2024. Natgasoline provided comments on the draft permits to TCEQ on February 15, 2024.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOV of 1/24/2024 & 2/28/2022	2/28/2022
7. Progress Report Submission Schedule	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): B-01001 Reformer

SOP Index No.:

Pollutant: NH_3

Applicable Requirement

Citation	Text Description
NSR Permit 107764 MAERT	Permitted emissions

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
MAERT exceedance	lb/hr limit	Semi-annual deviation report (SDR) for reporting period 1/1/2023 to 6/30/2023, Item 4

3. Non-compliance Situation Description

Permit exceedance in lb/hr

4. Corrective Action Plan Description

Natgasoline has initiated a Root Cause Analysis (RCA) No.22-03-07 022 to determine the root cause of the NH3 exceedances.

5. List of Activities/Milestones to Implement the Corrective Action Plan

Upon completion of RCA, Natgasoline will implement the findings and recommendations developed during RCA.

During a planned plant turnaround in September 2022, it was found that the selective catalytic reduction (SCR) was plugged which caused the ammonia concentration to increase. The SCR was cleaned and the performance improved immediately.

An ongoing investigation (RCA) is being conducted to further determine causes of the high ammonia. An ongoing investigation is being conducted to determine further improvements to the performance and reliability of the TDL.

The original permit did not truly represent actual operating conditions. A permit modification was resubmitted in May 2023 to reflect the hydrogen rich process fuel gas stream in the Steam Methane Reformer (SMR). The NOx energy limits were adjusted to 0.015 lb NOx/MMBtu to reflect the higher NOx energy in the reformer.

The draft permit was received from the TCEQ on February 2, 2024. Natgasoline's comments on the draft permit were submitted to the TCEQ on February 15, 2024.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOV of 1/12/2024 & 2/28/2022	2/28/2022
7. Progress Report Submission Schedule	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): B-14001 Aux Boiler

SOP Index No.:

Pollutant: NH_3

Applicable Requirement

Citation	Text Description
NSR Permit 107764 MAERT	Permitted emissions

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
MAERT exceedance	lb/hr limit	Semi-annual deviation report (SDR) for reporting period 7/1/2023 to 12/31/2023, Item 13

3. Non-compliance Situation Description

Permit exceedance in lb/hr

4. Corrective Action Plan Description

Natgasoline has initiated a Root Cause Analysis (RCA) No.22-03-07 022 to determine the root cause of the NH3 exceedances.

5. List of Activities/Milestones to Implement the Corrective Action Plan

Upon completion of RCA, Natgasoline will implement the findings and recommendations developed during RCA.

The original permit did not truly represent actual operating conditions. A permit modification was resubmitted in May 2023 to reflect the ammonia conditions within the Aux. Boiler. The draft permit increases the Nox energy limit NOx/MMbtu limits to 0.015 lb/hr to reflect the higher NOx energy in the reformer; therefore, the ammonia slip can be reduced accordingly.

The draft permit was received from the TCEQ on February 2, 2024. Natgasoline's comments on the draft permit were submitted to the TCEQ on February 15, 2024.

A TDL was installed in May 2023 to accurately measure ammonia concentrations. The TDL has allowed Natgasoline to more accurately control the ammonia concentrations.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOV of 2/28/2022	2/28/2022
7. Progress Report Submission Schedule	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): B-14001 Aux Boiler

SOP Index No.:

Pollutant: CO

Applicable Requirement

Citation	Text Description
NSR Permit 107764, SC 8B	Limit shall not exceed 100 PPMVD CO
	Corrected to 3% O2 on an hourly average.

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
SC 24 CEMS monitoring	Process data analysis	Semi-annual deviation report (SDR) for reporting period 1/1/2023 to 6/30/2023, Item 9

3. Non-compliance Situation Description

Emissions have exceeded 100 PPMVD of CO on an hourly average basis. This typically happens at the end of the SCR Startup period, as the unit reaches steady state.

4. Corrective Action Plan Description

NSR Permit modification has refined the definition of the SCR Startup period, which will result in fewer CO exceedances.

5. List of Activities/Milestones to Implement the Corrective Action Plan

NSR Permit modification was submitted in May 2023. Draft permit was received by Natgasoline on February 2, 2024. Natgasoline provided comments on the draft permits to TCEQ on February 15, 2024.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOV of 1/12/2024 & 2/28/2022	2/28/2022
7. Progress Report Submission Schedule	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): S-10001 Methanol Flare

SOP Index No.: R1111, 63A

Pollutant: CO2/CO2e

Applicable Requirement

Citation	Text Description
GHG PSDTX54 MAERT	MAERT

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
GHG PSDTX54	MAERT	Semi-annual deviation report (SDR) for
		reporting period 7/1/2023 to 12/31/2023, Item 33

3. Non-compliance Situation Description

Exceeded rolling annual totals

4. Corrective Action Plan Description

Submitted voluntary GHG revision in May 2023.

5. List of Activities/Milestones to Implement the Corrective Action Plan

Submitted voluntary GHG revision to TCEQ in May 2023 increased CO2 emissions on MAERT.

Draft GHG permit was received by Natgasoline on February 2, 2024. Natgasoline provided comments on the

Draft GHG permit to TCEQ on February 15, 2024.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOE 1/12/2024	Ongoing
7. Progress Report Submission Schedule	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: O3963
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2

A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. *(See form instruction for details.)* If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

1. Specific Non-Compliance Situation

Unit/Group/Process ID No.(s): S-10001 Methanol Flare MSS

SOP Index No.: R1111, 63A

Pollutant: CO2/CO2e

Applicable Requirement

Citation	Text Description
GHG PSDTX54 MAERT	MAERT

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
GHG PSDTX54	MAERT	Semi-annual deviation report (SDR) for
		reporting period 7/1/2023 to 12/31/2023, Item 34

3. Non-compliance Situation Description

Exceeded rolling annual totals

4. Corrective Action Plan Description

Submitted voluntary GHG revision in May 2023.

5. List of Activities/Milestones to Implement the Corrective Action Plan

Submitted voluntary GHG revision to TCEQ in May 2023 increased CO2 emissions on MAERT.

Draft GHG permit was received by Natgasoline on February 2, 2024. Natgasoline provided comments on the

Draft GHG permit to TCEQ on February 15, 2024.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 2/21/2024	Regulated Entity No.: RN106586795	Permit No.: 107764
Company Name: Natgasoline LLC		Area Name: Methanol Plant

Part 2 (*continued)*

6. Previously Submitted Compliance Plan(s)	
Type of Action	**Date Submitted**
NOE 1/12/2024	Ongoing
7. Progress Report Submission Schedule	

APPENDIX C

SUMMARY FORMS

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.
2/21/2024	O3963	RN106586795

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
A	1	TANKVCUN	OP-UA01	Portable VCU Natural Gas		174371	174371
A	2	TANKVCUP	OP-UA01	Portable VCU Propane		174371	174371
A	3	B-01001, B-14001	OP-UA06 OP-UA01 OP-UA05	AMOC for ammonia analyzer		107764	107764
D	4	TK-03007	OP-UA3	Slop Tank		107764	107764
D	5	F-10001	NONE	Methanol Flare		107764	107764
D	6	D-04001	NONE	Methanol Scrubber		107764	107764

Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR
Table 2

Date	Permit No.	Regulated Entity No.
2/21/2024	O3963	RN106586795

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.

Major NSR Summary Table

Permits Numbers: 107764 and PSDTX1340					Issuance Date: Draft		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.
B-01001	Reformer	NOx	23.28	58.69	3, 10, 24, 25, 27	3, 24, 25, 27	3, 24, 25
B-01001	Reformer	NOx (6)	62.08	6.83	10, 24	24	24
B-01001	Reformer	NH3	5.71	21.57	10, 24, 25, 27	24, 25, 27	24, 25
B-01001	Reformer	CO	93.84	124.18	10, 24, 25, 27	24, 25, 27	24, 25
B-01001	Reformer	VOC	8.37	10.16	10		
B-01001	Reformer	SO2	1.52	5.75	7, 10		
B-01001	Reformer	PM	6.29	23.77	10		
B-01001	Reformer	PM10	6.29	23.77	10		
B-01001	Reformer	PM2.5	5.53	20.92	10, 25, 27	25, 27	25
B-01001	Reformer	PM2.5 (7)	6.64	0.4	10		
B-14001	Auxiliary Boiler	NOx	14.25	30.57	3, 24, 25, 26	3, 24, 25, 26	3, 24, 25
B-14001	Auxiliary Boiler	NOx (6)	38.00	3.42	24	24	24
B-14001	Auxiliary Boiler	NH3	3.64	11.71	24, 25, 26	24, 25, 26	24, 25
B-14001	Auxiliary Boiler	CO	59.96	38.57	24, 25, 26	24, 25, 26	24, 25

Major NSR Summary Table

Permits Numbers: 107764 and PSDTX1340					Issuance Date: 08/14/2017		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.
B-14001	Auxiliary Boiler	VOC	5.12	16.479			
B-14001	Auxiliary Boiler	SO_2	0.53	1.71	7		
B-14001	Auxiliary Boiler	PM	5.00	14.44			
B-14001	Auxiliary Boiler	PM_{10}	4.75	14.44			
B-14001	Auxiliary Boiler	$PM_{2.5}$	3.95	12.71	25, 26	25, 26	25
S-10001	MeOH Flare	NOx	2.28	10.01	14	14	
S-10001	MeOH Flare	CO	15.39	67.57	14	14	
S-10001	MeOH Flare	VOC	0.84	3.68	5, 14	5, 14	5
S-10001	MeOH Flare	MeOH	0.42	1.83	5, 14	5, 14	5
S-10001	MeOH Flare	SO_2	0.043	0.19	7, 14	14	
S-10001 MSS	MeOH Flare MSS	NOx	425.11	19.70	14	14, 30	
S-10001 MSS	MeOH Flare MSS	CO	3644.98	300.31	14	14, 30	
S-10001 MSS	MeOH Flare MSS	VOC	158.59	1.12	5, 14	5, 14, 30	5
S-10001 MSS	MeOH Flare MSS	MeOH	151.04	0.85	5, 14	5, 14, 30	5

Major NSR Summary Table

Permits Numbers: 107764 and PSDTX1340					Issuance Date: 08/14/2017		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.
S-10001 MSS	MeOH Flare MSS	SO_2	12.55	0.6	7, 14	14, 30	
D-04001	MeOH Water Scrubber 1	VOC	7.24	1.65	5, 17, 25	5, 13, 17, 25	5, 25
D-04001	MeOH Water Scrubber 1	MeOH	7.24	1.65	5, 17, 25	5, 13, 17, 25	5, 25
FUG-MeOH	MeOH Fugitives (5)	VOC	9.73	7.44	5, 18, 22	5, 18, 22	5, 22
FUG-MeOH	MeOH Fugitives (5)	MeOH	9.63	6.94	5, 18, 22	5, 18, 22	5, 22
FUG-MeOH	MeOH Fugitives (5)	NH_3	0.01	0.01	23	23	
T-06001	MeOH Cooling Tower	VOC	7.54	10.41	5, 19	5, 19	5
T-06001	MeOH Cooling Tower	MeOH	7.54	10.41	5, 19	5, 19	5
T-06001	MeOH Cooling Tower	PM	37.70	82.57			
T-06001	MeOH Cooling Tower	PM_{10}	0.58	1.27			
T-06001	MeOH Cooling Tower	$PM_{2.5}$	0.01	0.03			

Major NSR Summary Table

Permits Numbers: 107764 and PSDTX1340					Issuance Date: 08/14/2017		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.
TEMP-MSS	Controlled Tank MSS Emissions	NOx	0.59	0.01	33, 34, 35, 36	30, 33, 34, 35, 36	
TEMP-MSS	Controlled Tank MSS Emissions	CO	1.17	0.02	33, 34, 35, 36	30, 33, 34, 35, 36	
TEMP-MSS	Controlled Tank MSS Emissions	VOC	6.74	0.12	33, 34, 35, 36	30, 33, 34, 35, 36	
TEMP-MSS	Controlled Tank MSS Emissions	MeOH	6.73	0.12	33, 34, 35, 36	30, 33, 34, 35, 36	
TEMP-MSS	Controlled Tank MSS Emissions	SO_2	<0.01	<0.01	33, 34, 35, 36	30, 33, 34, 35, 36	
TEMP-MSS	Controlled Tank MSS Emissions	PM	0.03	<0.01	33, 34, 35, 36	30, 33, 34, 35, 36	
TEMP-MSS	Controlled Tank MSS Emissions	PM_{10}	0.03	<0.01	33, 34, 35, 36	30, 33, 34, 35, 36	
TEMP-MSS	Controlled Tank MSS Emissions	$PM_{2.5}$	0.03	<0.01	33, 34, 35, 36	30, 33, 34, 35, 36	
FUG-MSS	Atmosphere MSS Emissions	VOC	29.00	0.09	32, 33, 34, 35	30, 31, 32, 33, 34, 35	
FUG-MSS	Atmosphere MSS Emissions	MeOH	29.00	0.09	32, 33, 34, 35	30, 31, 32, 33, 34, 35	

(1) Emission point identification – either specific equipment designation or emission point number from plot plan.
(2) Specific point source name. For fugitive sources, use area name or fugitive source name.
(3) NO_x – total oxiders of nitrogen
PM – total particulate matter, suspended in the atmosphere, including PM_{10} and $PM_{2.5}$
PM_{10} – particulate matter equal to or less than 10 microns in diameter, including $PM_{2.5}$
$PM_{2.5}$ – particulate matter equal to or less than 2.5 microns in diameter
CO – carbon monoxide
H_2SO_4 – sulfuric acid
(4) Compliance with annual emission limits (tons per year) is based on a 12-month rolling period.
(5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.

APPENDIX D

UNIT ATTRIBUTE FORMS

Texas Commission on Environmental Quality
Miscellaneous Unit Attributes
Form OP-UA1 (Page 1)
Federal Operating Permit Program

Date:	**2/21/2024**
Permit No.:	**O3963**
Regulated Entity No.:	**RN106586795**

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
B-01002FG	60NNN-01	PRO	6/2018			Complying with 40 CFR 65, Consolidated Federal Air Rule in lieu of NSPS NNN.
B-01002FG	60RRR-01	PRO	6/2018			Complying with 40 CFR 65, Consolidated Federal Air Rule in lieu of NSPS RRR.
B-14001FG	60NNN-01	PRO	6/2018			Complying with 40 CFR 65, Consolidated Federal Air Rule in lieu of NSPS NNN.
B-14001FG	60RRR-01	PRO	6/2018			Complying with 40 CFR 65, Consolidated Federal Air Rule in lieu of NSPS RRR.
B-01001FG	60NNN-01	PRO	6/2018			Complying with 40 CFR 65, Consolidated Federal Air Rule in lieu of NSPS NNN.

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
B-01001FG	60RRR-01	PRO	6/2018			Complying with 40 CFR 65, Consolidated Federal Air Rule in lieu of NSPS RRR.
B-01001	63DDDDD-01	EU	6/2018			Subject to 40 CFR 63, DDDDD.
B-14001	63DDDDD-01	EU	6/2018			Subject to 40 CFR 63, DDDDD.
TANKVCUN		CD	As needed		5+	Authorized by standard permit pursuant to Title 30 Texas Administrative Code §116.602
TANKVCUP		CD	As needed		5+	Authorized by standard permit pursuant to Title 30 Texas Administrative Code §116.602

Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 1)
Federal Operating Permit Program
Table 1a: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)
Subchapter B: Combustion Control at Major Industrial, Commercial, and Institutional Sources in Ozone Nonattainment Areas
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/21/2024	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	Horsepower Rating	RACT Date Placed in Service	Functionally Identical Replacement	Type of Service	Fuel Fired	Engine Type	ESAD Date Placed in Service	Diesel HP Rating
H-EMG		**300+**	**FCD+**						
H-FWP1		**300+**	**FCD+**						
H-FWP2		**300+**	**FCD+**						

Stationary Reciprocating Internal Combustion Engine Attributes
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.
2/21/2024	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	HAP Source	Brake HP	Construction/ Reconstruction Date	Nonindustrial Emergency Engine	Service Type	Stationary RICE Type
H-EMG	**63ZZZZ**	**MAJOR**	**500+**	**06+**		**EMER-A**	
H-FWP1	**63ZZZZ**	**MAJOR**	**500+**	**06+**		**EMER-A**	
H-FWP2	**63ZZZZ**	**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.
2/21/2024	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	Applicability Date	Exemptions	Service	Commencing	Manufacture Date
H-EMG	**60IIII**	**2005+**	**NONE**	**EMERG**	**CON**	**0406+**
H-FWP1	**60IIII**	**2005+**	**NONE**	**FIRE**	**CON**	**0406+**
H-FWP2	**60IIII**	**2005+**	**NONE**	**FIRE**	**CON**	**0406+**

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.
2/21/2024	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	Diesel	AES No.	Displacement	Generator Set	Model Year	Install Date
H-EMG	**60IIII**	**DIESEL**		**10-**		**2014**	
H-FWP1	**60IIII**	**DIESEL**		**10-**		**2014**	
H-FWP2	**60IIII**	**DIESEL**		**10-**		**2014**	

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.
2/21/2024	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	Kilowatts	Filter	AECD	Standard	Compliance Option	PM Compliance	Options
H-EMG	**60IIII**	**E560-2237**			**YES**	**MANU YES**		
H-FWP1	**60IIII**	**F560+**			**YES**	**MANU YES**		
H-FWP2	**60IIII**	**F560+**			**YES**	**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.
2/21/2024	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	Alternate Control Requirement	ACR ID No.	Product Stored	Storage Capacity	Throughput	Potential to Emit	Uncontrolled Emissions
GRP-TKMEOH	R5112	NO		VOC1	A40K+			
GRP-TKDSL1	R5112	NO		VOC1	A1K-25K			
GRP-TKDSL2	R5112	NO		VOC1	A1K-			

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.
2/21/2024	O3963	RN106586795

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.
GRP-TKMEOH	R5112		VRS1	1.5+A			OTHER	D-04001
GRP-TKDSL1	R5112		NONE1	1-				

Storage Tank/Vessel Attributes
Form OP-UA3 (Page 13)
Federal Operating Permit Program
Table 9a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart G: National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Storage Vessels
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/21/2024	O3963	RN106586795

Unit ID No.	SOP Index No.	MACT Subpart F/G Applicability	NESHAP Subpart Y Applicability	NSPS Subpart Kb Applicability	Maximum TVP	Emission Control Type	AMOC ID No.
GRP-TKMEOH	63G	YES	NO		11.11-	CVS-CD	
TK-03007	63G	NO	NO	NO			

Storage Tank/Vessel Attributes
Form OP-UA3 (Page 14)
Federal Operating Permit Program
Table 9b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart G: National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Storage Vessels
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/21/2024	O3963	RN106586795

Unit ID No.	SOP Index No.	Seal Type	Closed Vent System	Hard Piping	Bypass Lines	Control Device Type	Control Device ID No.	Control Device Design	Design Evaluation Submitted
GRP-TKMEOH	63G		SUBPTG	YES	NONE	OTHER	D-04001	NO	NO

Process Heater/Furnace Attributes
Form OP-UA5 (Page 1)
Federal Operating Permit Program
Table 1a: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)
Subchapter B: Combustion Control at Major Industrial, Commercial, and Institutional Sources in Ozone Nonattainment Areas, Process Heaters
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/21/2024	O3963	RN106586795

Unit ID No.	SOP/GOP Index No.	Unit Type	Maximum Rated Capacity	RACT Date Placed in Service	Functionally Identical Replacement	Fuel Type(s)			Annual Heat Input	NOx Emission Limitation	Opt-In Unit	23C-Option
B-01001	R7103	PRHTR	200+	FCD+								

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 6)
Federal Operating Permit Program
Table 3a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Db: Standards of Performance for Industrial-Commercial Steam Generating Units
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/21/2024	O3963	RN106586795

Unit ID No.	SOP Index No.	Construction/Modification Date	Heat Input Capacity	Subpart Da	Changes to Existing Affected Facility	Subpart Ea, Eb, or AAAA	Subpart KKKK	Subpart Cb or BBBB
B-14001	60DB	05+CR	250+	NO	NO	NO	NO	NO
B-01002	60DB	05+CR	250+	NO	NO	NO	NO	NO

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 7)
Federal Operating Permit Program
Table 3b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Db: Standards of Performance for Industrial-Commercial Steam Generating Units
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/21/2024	O3963	RN106586795

Unit ID No.	SOP Index No.	D-Series Fuel Type	D-Series Fuel Type	D-Series Fuel Type	Subpart D	Subpart J	Subpart E	ACF Option SO_2	ACF Option PM	ACF Option NO_X
B-14001	60DB	NG	GFF			NO	NO	OTHR	OTHR	OTHR
B-01002	60DB	NG	GFF			NO	NO	OTHR	OTHR	OTHR

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 8)
Federal Operating Permit Program
Table 3c: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Db: Standards of Performance for Industrial-Commercial Steam Generating Units
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/21/2024	O3963	RN106586795

Unit ID No.	SOP Index No.	60.42b (k)(2) Low Sulfur Exemption	60.42b (k)(4) Alternative	Post-Combustion Control	60.43b(h)(2) Alternative	Electrical or Mechanical Output	Output Based Limit	Steam with Electricity	Electricity Only	60.49 Da(n) Alternative	60.49 Da(m) Alternative
B-14001	60DB	YES				NO				NO	NO
B-01002	60DB	YES				NO				NO	NO

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 9)
Federal Operating Permit Program
Table 3d: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Db: Standards of Performance for Industrial-Commercial Steam Generating Units
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/21/2024	O3963	RN106586795

Unit ID No.	SOP Index No.	Residual Oil Sampling	Monitoring Type PM	Monitoring Type Opacity	Monitoring Type NO_X	Monitoring Type SO_2	Technology Type	Unit Type	Heat Release Rate	Heat Input Gas/Oil	Heat Input Wood	Fuel Heat Input
B-14001	60DB		NONE	NONE	CEM	FLSMP	NONE	OTHR	NGHIGH			
B-01002	60DB		NONE	NONE	CEM	FLSMP	NONE	OTHR	NGHIGH			

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 13)
Federal Operating Permit Program
Table 5a: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)
Subpart B: Combustion Control at Major Industrial, Commercial and Institutional Sources in Ozone Nonattainment Areas
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/21/2024	O3963	RN106586795

Unit ID No.	SOP Index No.	Unit Type	MRC	RACT Date Placed in Service	Functionally Identical Replacement	Fuel Type	Fuel Type	Fuel Type	Annual Heat Input
B-14001	R7103	ICIB	250+	FCD+					
B-01002	R7103	ICIB	250+	FCD+					

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.
2/21/2024	O3963	RN106586795

Unit ID No.	SOP/GOP Index No	Acid Gases Only	Emergency/Upset Conditions Only	Alternate Opacity Limitation (AOL)	AOL ID No.	Construction Date
S-10001	R1111	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.
2/21/2024	O3963	RN106586795

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
S-10001	60A	YES	YES	NONE	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.
2/21/2024	O3963	RN106586795

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
S-10001	63A	YES	YES	NONE	60-400	1000-

Fugitive Emission Unit Attributes
Form OP-UA12 (Page 70)
Federal Operating Permit Program
Table 9a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart H: National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/21/2024	O3963	RN106586795

Unit ID No.	SOP Index No.	Equipment Type	Non Research and Development/Batch Processes	Vacuum Service	Less Than 300 Operating Hours	Heavy Liquid Service	AMEL
FUG-MEOH	63H-ALL						

Fugitive Emission Unit Attributes
Form OP-UA12 (Page 72)
Federal Operating Permit Program
Table 9c: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart H: National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/21/2024	O3963	RN106586795

Unit ID. No.	SOP Index No.	Title 40 CFR Part 63, Subpart H Fugitive Unit Components								
		Pumps			Compressors	Pressure Relief Devices			Sampling Connection Systems	
		Light Liquid Service	Heavy Liquid Service	QIP	Any	Gas/Vapor Service	Liquid Service	Heavy Liquid Service	Any	Heavy Liquid Service
FUG-MEOH	63H-ALL									

Fugitive Emission Unit Attributes
Form OP-UA12 (Page 73)
Federal Operating Permit Program
Table 9d: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart H: National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/21/2024	O3963	RN106586795

Unit ID. No.	SOP Index No.	Title 40 CFR Part 63, Part 63, Subpart H Fugitive Unit Components						
		Open-Ended	Valves or Lines	Valves			Connectors	
		Any	Heavy Liquid Service	Gas/Vapor or Light Liquid Service	Heavy Liquid Service	QIP	Gas/Vapor or Light Liquid Service	Heavy Liquid Service
FUG-MEOH	63H-ALL							

Fugitive Emission Unit Attributes
Form OP-UA12 (Page 74)
Federal Operating Permit Program
Table 9e: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart H: National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/21/2024	O3963	RN106586795

Unit ID No.	SOP Index No.	Title 40 CFR Part 63, Subpart H Fugitive Unit Components					
		Agitators		Instrumentation	Systems	Surge Control	Vessels or Bottom Receivers
		Gas/Vapor or Light Liquid Service	Heavy Liquid Service	Any	Heavy Liquid Service	Any	Heavy Liquid Service
FUG-MEOH	63H-ALL						

Fugitive Emission Unit Attributes
Form OP-UA12 (Page 75)
Federal Operating Permit Program
Table 9f: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart H: National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/21/2024	O3963	RN106586795

Unit ID No.	SOP Index No.	Title 40 CFR Part 63, Subpart H Fugitive Unit Components						
		Closed-Vent System						
		Any	Recovery or Recapture Devices	Control Device ID No.	Enclosed Combustion Devices	Control Device ID No.	Flares	Control Device ID No.
FUG-MEOH	63H-ALL	YES	NO		NO		YES	S-10001

Fugitive Emission Unit Attributes
Form OP-UA12 (Page 76)
Federal Operating Permit Program
Table 9g: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart H: National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/21/2024	O3963	RN106586795

Unit ID No.	SOP Index No.	Bypass Lines	Unsafe To Inspect	Difficult To Inspect	Employee Number	Title 40 CFR Part 63, Subpart H Fugitive Unit Description
FUG-MEOH	63H-ALL					PIPELINE 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.
2/21/2024	O3963	RN106586795

Unit ID No.	SOP Index No.	Produces Chemicals	Affected Facility	Construction/Modification Date	Compliance Option	Design Capacity	Facility Type
FUG-MEOH	60VVa-ALL						

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.
2/21/2024	O3963	RN106586795

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
FUG-MEOH	60VVa-ALL				

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.
2/21/2024	O3963	RN106586795

		Title 40 CFR Part 60, Subpart VVa Fugitive Unit Components (continued)				
		Compressor				Pressure Relief Devices
Unit ID No.	SOP Index No.	Compressor	EEL	EEL ID No.	Complying with 60.482-3a	Gas/Vapor Service
FUG-MEOH	60VVa-ALL					

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.
2/21/2024	O3963	RN106586795

Unit ID No.	SOP Index No.	Title 40 CFR Part VVa Fugitive Unit Components (continued)							
		Sampling Connection		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
FUG-MEOH	60VVa-ALL								

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.
2/21/2024	O3963	RN106586795

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
FUG-MEOH	60VVa-ALL					

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.
2/21/2024	O3963	RN106586795

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
FUG-MEOH	60VVa-ALL								

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.
2/21/2024	O3963	RN106586795

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
FUG-MEOH	60VVa-ALL								

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.
2/21/2024	O3963	RN106586795

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.
FUG-MEOH	60VVa-ALL					

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.
2/21/2024	O3963	RN106586795

		Title 40 CFR Part 60, Subpart VVa Fugitive Unit Components (continued)				
		Closed Vent Systems and Control Devices (continued)				
Unit ID No.	SOP Index No.	Enclosed Combustion Device	EEL	EEL ID No.	Complying With 60.482-10a	Control Device ID.
FUG-MEOH	60VVa-ALL					

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.
2/21/2024	O3963	RN106586795

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.
FUG-MEOH	60VVa-ALL					

Fugitive Emission Unit Attributes
Form OP-UA12 (Page 155)
Federal Operating Permit Program
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.
2/21/2024	O3963	RN106586795

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
FUG-MEOH	60VVa-ALL					

Fugitive Emission Unit Attributes
Form OP-UA12 (Page 156)
Federal Operating Permit Program
Table 17l: 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.
2/21/2024	O3963	RN106586795

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
FUG-MEOH	60VVa-ALL	Pipeline Fugitives

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 1)
Federal Operating Permit Program
Table 1a: Title 30 Texas Administrative Code Chapter 111 (30 TAC Chapter 111)
Subchapter A: Visible Emissions
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/21/2024	O3963	RN106586795

Emission Point ID No.	SOP/GOP Index No.	Alternate Opacity Limitation	AOL ID No.	Vent Source	Opacity Monitoring System	Construction Date	Effluent Flow Rate
B-01002SK	R111	NO		OTHER	NONE	72+	100+
B-14001SK	R111	NO		OTHER	NONE	72+	100+

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.
2/21/2024	O3963	RN106586795

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
B-01001FG	R5120	NO	NO	DISTOPHER				
B-01002FG	R5120	NO	NO	DISTOPHER				
B-14001FG	R5120	NO	NO	DISTOPHER				
S-10001VT	R5120	NO	NO	REGVAPPL				

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.
2/21/2024	O3963	RN106586795

Emission Point ID No.	SOP Index No.	Alternate Control Requirement	ACR ID No.	Control Device Type	Control Device ID No.
B-01001FG	R5120	NONE		OTHER	B-01001
B-01002FG	R5120	NONE		OTHER	B-01002
B-14001FG	R5120	NONE		OTHER	B-14001
S-10001VT	R5120	NONE		FLARE	S-10001

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
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Federal Operating Permit Program
Table 2c: 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.
2/21/2024	O3963	RN106586795

Emission Point ID No.	SOP Index No.	Total Design Capacity	Flow Rate/Concentration	40 CFR Part 60, Subpart NNN Requirements	40 CFR Part 60, Subpart RRR Requirements
B-01001FG	R5120	1100+	500+	NO	NO
B-01002FG	R5120	1100+	500+	NO	NO
B-14001FG	R5120	1100+	500+	NO	NO

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 13)
Federal Operating Permit Program
Table 6a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart G: National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/21/2024	O3963	RN106586795

Emission Point ID No.	SOP Index No.	Overlap	Group 1	Regulation	HAP Concentration	Flow Rate	Electing Control	NSPS TRE Index Value	MACT TRE Index Value	Plant Type
S-10001VT	63G	NNN	YES							

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 14)
Federal Operating Permit Program
Table 6b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart G: National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/21/2024	O3963	RN106586795

Emission Point ID No.	SOP Index No.	Control Device	Control Device ID No.	Halogenated	TRE for Halogenated Vent Stream	Halogen Reduction Device	Installation Date	Performance Test
S-10001VT	63G	FLARE	S-10001	NO				

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 15)
Federal Operating Permit Program
Table 6c: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart G: National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/21/2024	O3963	RN106586795

Emission Point ID No.	SOP Index No.	Alternate Monitoring Parameters (AMP)	AMP ID No.	Continuous Monitoring	Continuous Monitoring Alt ID No.	Bypass Lines	Flow Indicator
S-10001VT	63G	NO		NOALT		NO	

Texas Commission on Environmental Quality
Distillation Unit Attributes
Form OP-UA17 (Page 1)
Federal Operating Permit Program
Table 1a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart NNN: Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations

Date:	**2/21/2024**
Permit No.:	**O3963**
Regulated Entity No.:	**RN106586795**

Unit ID No.	SOP Index No.	Subpart NNN Chemicals	Construction/Modification Date	Vent Type	Distillation Unit Type	Total Design Capacity	Vent Stream Flow Rate
B-01001FG	65-1NNN	YES	83+	2+VRS	NONE	1+	8+
B-01002FG	65-2NNN	YES	83+	2+VRS	NONE	1+	8+
B-14001FG	65-3NNN	YES	83+	2+VRS	NONE	1+	8+

Texas Commission on Environmental Quality
Distillation Unit Attributes
Form OP-UA17 (Page 2)
Federal Operating Permit Program
Table 1b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart NNN: Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations

Date:	**2/21/2024**
Permit No.:	**O3963**
Regulated Entity No.:	**RN106586795**

Unit ID No.	SOP Index No.	Total Resource Effectiveness	TOC Reduction	Subpart NNN Control Device	ACT ID No.	Subpart NNN Control Device ID No.	Emission Point ID No(s).		Organic Monitoring Device
B-01001FG	65-1NNN	8-B	*	*	*	*	*	*	*
B-01002FG	65-2NNN	8-B	*	*	*	*	*	*	*
B-14001FG	65-3NNN	8-B	*	*	*	*	*	*	*

Texas Commission on Environmental Quality
Reactor Attributes
Form OP-UA48 (Page 3)
Federal Operating Permit Program

Table 2a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60) Subpart RRR: Standards of Performance for Volatile Organic Compound Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes

Date:	**2/21/2024**
Permit No.:	**O3963**
Regulated Entity No.:	**RN106586795**

Unit ID No.	SOP Index No.	Chemicals Listed In § 60.707	Construction/ Modification Date	Affected Facility Type	Subject To Title 40 CFR Part 60, Subpart DDD	Subject To Title 40 CFR Part 60, Subpart NNN	TRE Index Value	TRE for Halogenated Vent Stream
B-01001FG	65-1RRR	YES	90+	COMBO	NO	NO	9-	NO
B-01002FG	65-2RRR	YES	90+	COMBO	NO	NO	9-	NO
B-14001FG	65-3RRR	YES	90+	COMBO	NO	NO	9-	NO

Texas Commission on Environmental Quality
Reactor Attributes
Form OP-UA48 (Page 4)
Federal Operating Permit Program

Table 2b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60) Subpart RRR: Standards of Performance for Volatile Organic Compound Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes

Date:	**2/21/2024**
Permit No.:	**O3963**
Regulated Entity No.:	**RN106586795**

Unit ID No.	SOP Index No.	Total Design Capacity	Vent Stream Flow Rate	TOC Exemption	Control Device	Control Device ID No.
B-01001FG	65-1RRR	1+	11+	NOEX	*	*
B-01002FG	65-2RRR	1+	11+	NOEX	*	*
B-14001FG	65-3RRR	1+	11+	NOEX	*	*

Form OP-UA60 (Page 1)
Federal Operating Permit Program

Table 1a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart F: National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry

Date: 2/21/2024	**Permit No.: O3963**	**Regulated Entity No.: 106586795**
Area Name: Methanol Plant		**Customer Reference No.: CN604256412**

Process ID No.	SOP Index No.	Applicable Chemicals	Table 2 HAP	Alternate Means of Emission Limitation (AMEL)	AMEL ID No.	Heat Exchange System	Cooling Water Pressure
PRO-MEOH	63F	YES	YES	NO		YES	YES

APPENDIX E

APPLICABILITY AND REQUIREMENTS FORMS

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

Date:	2/21/2024
Permit No.:	O3963
RN No.:	106586795

For SOP applications, answer ALL questions unless otherwise directed.
♦ *For GOP applications, answer ONLY these questions unless otherwise directed.*

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.	☐YES ☒NO
♦	2.	The application area includes stationary vents constructed after January 31, 1972. *If the responses to Questions I.A.1 and I.A.2 are both "NO," go to Question I.A.6.* *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.*	☒YES ☐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.	☐YES ☐NO
♦	4.	All stationary vents are addressed on a unit specific basis.	☐YES ☒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.	☒YES ☐NO
♦	6.	The application area includes structures subject to 30 TAC § 111.111(a)(7)(A).	☒YES ☐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).	☐YES ☒NO
♦	8.	Emissions from units in the application area include contributions from uncombined water.	☒YES ☐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).	☐YES ☐NO ☒N/A

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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.	☐YES ☒NO
♦		b.	The application area is located within the Fort Bliss Military Reservation, except areas specified in 30 TAC § 111.141.	☐YES ☒NO
♦		c.	The application area is located in the portion of Harris County inside the loop formed by Beltway 8.	☐YES ☒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.	☐YES ☒NO
		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.		
	2.	Items a - d determine the specific applicability of these requirements.		
♦		a.	The application area is subject to 30 TAC § 111.143.	☐YES ☐NO
♦		b.	The application area is subject to 30 TAC § 111.145.	☐YES ☐NO
♦		c.	The application area is subject to 30 TAC § 111.147.	☐YES ☐NO
♦		d.	The application area is subject to 30 TAC § 111.149.	☐YES ☐NO
	C.	**Emissions Limits on Nonagricultural Processes**		
♦	1.	The application area includes a nonagricultural process subject to 30 TAC § 111.151.		☒YES ☐NO
	2.	The application area includes a vent from a nonagricultural process that is subject to additional monitoring requirements. *If the response to Question I.C.2 is "NO," go to Question I.C.4.*		☐YES ☒NO
	3.	All vents from nonagricultural process in the application area are subject to additional monitoring requirements.		☐YES ☐NO

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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).	☐YES ☒NO
	5.	The application area includes oil or gas fuel-fired steam generators that are subject to additional monitoring requirements. *If the response to Question I.C.5 is "NO," go to Question I.C.7.*	☐YES ☒NO
	6.	All oil or gas fuel-fired steam generators in the application area are subject to additional monitoring requirements.	☐YES ☐NO
	7.	The application area includes solid fossil fuel-fired steam generators subject to 30 TAC §§ 111.153(a) and 111.153(b).	☐YES ☒NO
	8.	The application area includes solid fossil fuel-fired steam generators that are subject to additional monitoring requirements. *If the response to Question I.C.8 is "NO," go to Section I.D.*	☐YES ☒NO
	9.	All solid fossil fuel-fired steam generators in the application area are subject to additional monitoring requirements.	☐YES ☒NO
	D.	**Emissions Limits on Agricultural Processes**	
	1.	The application area includes agricultural processes subject to 30 TAC § 111.171.	☐YES ☒NO
	E.	**Outdoor Burning**	
♦	1.	Outdoor burning is conducted in the application area. *If the response to Question I.E.1 is "NO," go to Section II.*	☐YES ☒NO
♦	2.	Fire training is conducted in the application area and subject to the exception provided in 30 TAC § 111.205.	☐YES ☐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.	☐YES ☐NO
♦	4.	Disposal fires are used in the application area and subject to the exception provided in 30 TAC § 111.209.	☐YES ☐NO

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For SOP applications, answer ALL questions unless otherwise directed.
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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.	☐YES ☐NO
♦		6.	Hydrocarbon burning is used in the application area and subject to the exception provided in 30 TAC § 111.213.	☐YES ☐NO
♦		7.	The application area has received the TCEQ Executive Director approval of otherwise prohibited outdoor burning according to 30 TAC § 111.215.	☐YES ☐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.	☐YES ☒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. *See instructions for inclusive counties. If the response to Question III.A.1 is "NO," go to Section IV.*	☒YES ☐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.	☒YES ☐NO

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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. *If the response to Question III.C.1 is "NO" or "N/A," go to Section III.D.*	☒YES ☐NO ☐N/A
	2.	The application area is located at a petroleum refinery in the Beaumont/Port Arthur or Houston/Galveston/Brazoria area. *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.*	☐YES ☒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). Division 4 Ind Wastewater *If the response to Question III.C.3 is "YES," go to Section III.D.*	☐YES ☒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). *If the response to Question III.C.4 is "YES," go to Section III.D.*	☒YES ☐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).	☐YES ☐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).	☐YES ☐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).	☐YES ☐NO
	D.	**Loading and Unloading of VOCs**	
♦	1.	The application area includes VOC loading operations.	☐YES ☒NO
♦	2.	The application area includes VOC transport vessel unloading operations. *For GOP applications, if the responses to Questions III.D.1 - D.2 are "NO," go to Section III.E.*	☐YES ☒NO

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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.	☐YES ☒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. *If the response to Question III.E.1 is "NO," go to Section III.F.*	☐YES ☒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.	☐YES ☐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. *If the response to Question III.E.2 and/or E.3 is "YES," go to Section III.F.*	☐YES ☐NO
♦		4.	The application area is located in a covered attainment county as defined in 30 TAC § 115.10. *If the response to Question III.E.4 is "NO," go to Question III.E.9.*	☐YES ☐NO
♦		5.	Stationary gasoline storage containers with a nominal capacity less than or equal to 1,000 gallons are located at the facility.	☐YES ☐NO
♦		6.	Stationary gasoline storage containers with a nominal capacity greater than 1,000 gallons are located at the facility.	☐YES ☐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. *If the response to Question III.E.7 is "YES," go to Section III.F.*	☐YES ☐NO

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For SOP applications, answer ALL questions unless otherwise directed.
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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. *If the response to Question III.E.8 is "YES," go to Section III.F.*	☐YES ☐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.	☐YES ☐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.	☐YES ☐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.	☐YES ☐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.	☐YES ☐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.	☐YES ☒NO ☐N/A

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For SOP applications, answer ALL questions unless otherwise directed.
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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.	☐YES ☒NO ☐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.	☐YES ☒NO ☐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. *If the response to Question III.G.1 is "NO" or "N/A," go to Section III.H.*	☐YES ☐NO ☒N/A
♦	2.	The application area includes facilities that began construction on or after November 15, 1992 and prior to May 16, 2012.	☐YES ☐NO
♦	3.	The application area includes facilities that began construction prior to November 15, 1992. *If the responses to Questions III.G.2 and Question III.G.3 are both "NO," go to Section III.H.*	☐YES ☐NO
♦	4.	The application area includes only facilities that have a monthly throughput of less than 10,000 gallons of gasoline.	☐YES ☐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.	☐YES ☐NO ☐N/A

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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. *If the response to Question III.H.1 is "NO" or "N/A," go to Section III.I.*	☐YES ☐NO ☒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.	☐YES ☐NO
♦	3.	The application area includes a motor vehicle fuel dispensing facility.	☐YES ☐NO
♦	4.	The application area includes stationary tanks, reservoirs, or other containers holding gasoline and having a nominal capacity of 500 gallons or less.	☐YES ☐NO
	I.	**Process Unit Turnaround and Vacuum-Producing Systems in Petroleum Refineries**	
	1.	The application area is located at a petroleum refinery.	☐YES ☒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.	☐YES ☐NO ☒N/A

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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. *If the response to Question III.K.1 is "N/A," go to Section III.L.*	☐YES ☐NO ☒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.	☐YES ☐NO ☐N/A
	3.	Asphalt emulsion is used or produced within the application area.	☐YES ☐NO
	4.	The application area is using an alternate control requirement as specified in 30 TAC § 115.513. *If the response to Question III.K.4 is "NO," go to Section III.L.*	☐YES ☐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).	☐YES ☐NO
	6.	The application area uses, applies, sells, or offers for sale cutback asphalt that is used solely as a penetrating prime coat.	☐YES ☐NO
	7.	The applicant using cutback asphalt is a state, municipal, or county agency.	☐YES ☐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. *If the response to Question III.L.1 is "NO" or "N/A," go to Section III.M.*	☒YES ☐NO ☐N/A
♦	2.	Degassing of only ocean-going, self-propelled VOC marine vessels is performed in the application area. *If the response to Question III.L.2 is "YES," go to Section III.M.*	☐YES ☒NO ☐N/A

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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.	☐YES ☒NO ☐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.	☒YES ☐NO ☐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.	☐YES ☒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.	☐YES ☐NO ☒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 ≥ 0.5 psia that have sustained damage as specified in 30 TAC § 115.547(5) is performed in the application area.	☐YES ☐NO ☒N/A
	M.	**Petroleum Dry Cleaning Systems**	
	1.	The application area contains one or more petroleum dry cleaning facilities that use petroleum based solvents.	☐YES ☒NO ☐N/A

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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.	☐YES ☐NO ☒N/A
	2.	The application area includes one or more flares that emit or have the potential to emit HRVOC. *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.*	☐YES ☐NO ☒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.	☐YES ☐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. *If the responses to Questions III.N.3 and III.N.4 are both "NO," go to Section III.O.*	☐YES ☐NO
	5.	The application area contains pressure relief valves that are not controlled by a flare.	☐YES ☐NO
	6.	The application area has at least one vent stream which has no potential to emit HRVOC.	☐YES ☐NO
	7.	The application area has vent streams from a source described in 30 TAC § 115.727(c)(3)(A) - (H).	☐YES ☐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.	☐YES ☐NO ☒N/A

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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. *For SOP applications, if the response to Question IV.A.1 is "YES," complete Sections IV.B - IV.F and IV.H.* *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.* *For GOP applications for GOP 517, if the response to Question IV.A.1 is "YES," complete Sections IV.C and IV.F.* *For GOP applications, if the response to Question IV.A.1 is "NO," go to Section VI.*	☒YES ☐NO
	2.	The application area is located in Bexar, Comal, Ellis, Hays, or McLennan County and includes a cement kiln. *If the response to Question IV.A.2 is "YES," go to Question IV.H.1.*	☐YES ☐NO
	3.	The application area includes a utility electric generator in an east or central Texas county. *See instructions for a list of counties included.* *If the response to Question IV.A.3 is "YES," go to Question IV.G.1.* *If the responses to Questions IV.A.1 - 3 are all "NO," go to Question IV.H.1.*	☐YES ☐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. *If the response to Question IV.B.1 is "NO," go to Question IV.C.1.*	☐YES ☒NO
	2.	The application area is complying with a System Cap in 30 TAC §§ 117.1020 or 117.1220.	☐YES ☐NO

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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. *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.*	☐YES ☒NO
♦	2.	The application area is located at a site that was a major source of NO_X before November 15, 1992.	☐YES ☐NO ☐N/A
♦	3.	The application area includes an electric generating facility required to comply with the System Cap in 30 TAC § 117.320.	☐YES ☐NO
	D.	**Adipic Acid Manufacturing**	
	1.	The application area is located at, or part of, an adipic acid production unit.	☐YES ☐NO ☒N/A
	E.	**Nitric Acid Manufacturing - Ozone Nonattainment Areas**	
	1.	The application area is located at, or part of, a nitric acid production unit.	☐YES ☐NO ☒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). *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.*	☐YES ☒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).	☐YES ☐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).	☐YES ☐NO

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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.	☐YES ☐NO
♦	5.	The application area has units subject to the emission specifications under 30 TAC §§ 117.2010 or 30 TAC § 117.2110.	☐YES ☐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. *If the response to Question IV.F.6 is "NO," go to Section IV.G.*	☐YES ☐NO
	7.	An ACSS for carbon monoxide (CO) has been approved?	☐YES ☐NO
	8.	An ACSS for ammonia (NH_3) has been approved?	☐YES ☐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. *If the response to Question IV.G.1 is "NO," go to Question IV.H.1.*	☐YES ☒NO
	2.	The application area is complying with the System Cap in 30 TAC § 117.3020.	☐YES ☐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. *If the response to question IV.H.1 is "NO," go to Section V.*	☐YES ☒NO
	2.	All water heaters, boilers or process heaters manufactured, distributed, retailed or installed qualify for an exemption under 30 TAC § 117.3203.	☐YES ☐NO

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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 refinish coatings or coating components and sells or distributes these coatings or coating components in the United States.	☐YES ☒NO
	2.	The application area imports automobile refinish coatings or coating components, manufactured on or after January 11, 1999, and sells or distributes these coatings or coating components in the United States. *If the responses to Questions V.A.1 and V.A.2 are both "NO," go to Section V.B.*	☐YES ☒NO
	3.	All automobile refinish 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).	☐YES ☐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.	☐YES ☒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.	☐YES ☒NO
	3.	The application area is a distributor of consumer products whose name appears on the label of one or more of the products. *If the responses to Questions V.B.1 - V.B.3 are all "NO," go to Section V.C.*	☐YES ☒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).	☐YES ☐NO

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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.	☐YES ☒NO
	2.	The application area manufactures or imports architectural coatings that are registered under the Federal Insecticide, Fungicide, and Rodenticide Act. *If the responses to Questions V.C.1-2 are both "NO," go to Section V.D.*	☐YES ☒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).	☐YES ☐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.	☐YES ☒NO
	2.	The application area is a distributor of aerosol coatings for resale or distribution in the United States.	☐YES ☒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. *If the response to Question V.E.1 is "NO," go to Section VI.*	☐YES ☒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).	☐YES ☐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. *If the response to Question VI.A.1 is "NO," go to Section VII.*	☒YES ☐NO

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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. *If the response to Question VI.B.1 is "NO," go to Section VI.C.*	☐YES ☒NO
	2.	The coal preparation and processing plant has a design capacity greater than 200 tons per day (tpd). *If the response to Question VI.B.2 is "NO," go to Section VI.C.*	☐YES ☐NO
	3.	The plant has an option to enforceably limit its operating level to less than 200 tpd and is choosing this option. *If the response to Question VI.B.3 is "YES," go to Section VI.C.*	☐YES ☐NO
	4.	The plant contains an open storage pile, as defined in § 60.251, as an affected facility. *If the response to Question VI.B.4 is "NO," go to Section VI.C.*	☐YES ☐NO
	5.	The open storage pile was constructed, reconstructed or modified after May 27, 2009.	☐YES ☐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. *If the response to Question VI.C.1 is "NO" or "N/A," go to Section VI.D.*	☐YES ☐NO ☒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. *If the response to Question VI.C.2 is "NO," go to Section VI.D.*	☐YES ☐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).	☐YES ☐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.	☐YES ☐NO

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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.	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.	☐YES ☐NO
	D.	**Subpart XX - Standards of Performance for Bulk Gasoline Terminals**	
	1.	The application area includes bulk gasoline terminal loading racks. *If the response to Question VI.D.1 is "NO," go to Section VI.E.*	☐YES ☒NO ☐N/A
	2.	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.	☐YES ☐NO
	E.	**Subpart LLL - Standards of Performance for Onshore Natural Gas Processing: Sulfur Dioxide (SO_2) Emissions**	
♦	1.	The application area includes affected facilities identified in 40 CFR § 60.640(a) that process natural gas (onshore). *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.*	☐YES ☒NO
♦	2.	The affected facilities commenced construction or modification after January 20, 1984 and on or before August 23, 2011. *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.*	☐YES ☐NO
♦	3.	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. *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.*	☐YES ☐NO

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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 (SO_2) Emissions (continued)**	
♦	4.	Federally enforceable operating limits have been established in the preconstruction authorization limiting the gas sweetening unit to less than 2 LTPD. *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.*	☐YES ☐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. *If the response to Question VI.F.1 is "NO," go to Section VI.G.*	☐YES ☒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.	☐YES ☐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. *If the response to Question VI.G.1 is "NO," go to Section VI.H.*	☐YES ☒NO
	2.	The application area includes storm water sewer systems.	☐YES ☐NO

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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.	☐YES ☐NO
	4.	The application area includes non-contact cooling water systems.	☐YES ☐NO
	5.	The application area includes individual drain systems. *If the response to Question VI.G.5 is "NO," go to Section VI.H.*	☐YES ☐NO
	6.	The application area includes one or more individual drain systems that meet the exemption specified in 40 CFR § 60.692-2(d).	☐YES ☐NO
	7.	The application area includes completely closed drain systems.	☐YES ☐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. *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.*	☐YES ☒NO ☐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.	☐YES ☐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.	☐YES ☐NO
♦	4.	The application area includes at least one air curtain incinerator. *If the response to Question VI.H.4 is "NO," go to Section VI.I.*	☐YES ☒NO

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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. *If the response to Question VI.H.5 is "NO," go to Question VI.H.7.*	☐YES ☐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.	☐YES ☐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.	☐YES ☐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.	☐YES ☐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. *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.*	☐YES ☒NO ☐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.	☐YES ☐NO

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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.	☐YES ☐NO
♦	4.	The application area includes at least one air curtain incinerator. *If the response to Question VI.I.4 is "NO," go to Section VI.J.*	☐YES ☒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. *If the response to Question VI.I.5 is "NO," go to VI.I.7.*	☐YES ☐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.	☐YES ☐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.	☐YES ☐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.	☐YES ☐NO

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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. *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.*	☐YES ☒NO ☐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.	☐YES ☐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.	☐YES ☐NO
♦	4.	The application area includes at least one air curtain incinerator. *If the response to Question VI.J.4 is "NO," go to Section VI.K.*	☐YES ☒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. *If the response to Question VI.J.5 is "NO," go to Question VI.J.7.*	☐YES ☐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.	☐YES ☐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.	☐YES ☐NO

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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.	☐YES ☐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.	☐YES ☐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.	☐YES ☐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.	☐YES ☒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. *If the response to Question VII.A.1 is "NO" or "N/A," go to Section VIII.*	☒YES ☐NO ☐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.	☐YES ☒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.	☐YES ☐NO ☒N/A

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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). *If the response to Question VII.D.1 is "NO," go to Section VII.E.*	☐YES ☒NO
2.	The application area includes equipment in benzene service as determined by 40 CFR § 61.137(b).	☐YES ☐NO
3.	The application area has elected to comply with the provisions of 40 CFR § 61.243-1 and 40 CFR § 61.243-2.	☐YES ☐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. *If the response to Question VII.E.1 is "NO," go to Section VII.F.*	☐YES ☒NO
Roadway Construction		
2.	The application area includes roadways constructed or maintained with asbestos tailings or asbestos-containing waste material.	☐YES ☐NO
Manufacturing Commercial Asbestos		
3.	The application area includes a manufacturing operation using commercial asbestos. *If the response to Question VII.E.3 is "NO," go to Question VII.E.4.*	☐YES ☐NO
a.	Visible emissions are discharged to outside air from the manufacturing operation	☐YES ☐NO
b.	An alternative emission control and waste treatment method is being used that has received prior U.S. Environmental Protection Agency (EPA) approval.	☐YES ☐NO

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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)			
***Manufacturing Commercial Asbestos* (continued)**			
	c.	Asbestos-containing waste material is processed into non-friable forms.	☐YES ☐NO
	d.	Asbestos-containing waste material is adequately wetted.	☐YES ☐NO
	e.	Alternative filtering equipment is being used that has received EPA approval.	☐YES ☐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	☐YES ☐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.	☐YES ☐NO
Asbestos Spray Application			
4.		The application area includes operations in which asbestos-containing materials are spray applied. *If the response to Question VII.E.4 is "NO," go to Question VII.E.5.*	☐YES ☐NO
	a.	Asbestos fibers are encapsulated with a bituminous or resinous binder during spraying and are not friable after drying. *If the response to Question VII.E.4.a is "YES," go to Question VII.E.5.*	☐YES ☐NO
	b.	Spray-on applications on buildings, structures, pipes, and conduits do not use material containing more than 1% asbestos.	☐YES ☐NO
	c.	An alternative emission control and waste treatment method is being used that has received prior EPA approval.	☐YES ☐NO

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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)			
***Asbestos Spray Application* (continued)**			
	d.	Asbestos-containing waste material is processed into non-friable forms.	☐YES ☐NO
	e.	Asbestos-containing waste material is adequately wetted.	☐YES ☐NO
	f.	Alternative filtering equipment is being used that has received EPA approval.	☐YES ☐NO
	g.	A HEPA filter is being used that is certified to be at least 99.97% efficient for 0.3 micron particles.	☐YES ☐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.	☐YES ☐NO
Fabricating Commercial Asbestos			
5.		The application area includes a fabricating operation using commercial asbestos. *If the response to Question VII.E.5 is "NO," go to Question VII.E.6.*	☐YES ☐NO
	a.	Visible emissions are discharged to outside air from the manufacturing operation.	☐YES ☐NO
	b.	An alternative emission control and waste treatment method is being used that has received prior EPA approval.	☐YES ☐NO
	c.	Asbestos-containing waste material is processed into non-friable forms.	☐YES ☐NO
	d.	Asbestos-containing waste material is adequately wetted.	☐YES ☐NO
	e.	Alternative filtering equipment is being used that has received EPA approval.	☐YES ☐NO

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Form OP-REQ1: Page 29			
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)**	
		***Fabricating Commercial Asbestos* (continued)**	
		f. A HEPA filter is being used that is certified to be at least 99.97% efficient for 0.3 micron particles.	☐YES ☐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.	☐YES ☐NO
		Non-sprayed Asbestos Insulation	
		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.	☐YES ☐NO
		Asbestos Conversion	
		7. The application area includes operations that convert regulated asbestos-containing material and asbestos-containing waste material into nonasbestos (asbestos-free) material.	☐YES ☐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.	☐YES ☒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. *If the response to Question VII.G.1 is "NO," go to Section VII.H.*	☐YES ☒NO
		2. The application area includes benzene transfer operations at marine vessel loading racks.	☐YES ☐NO

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Form OP-REQ1: Page 30			
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.	☐YES ☐NO
	4.	The application area includes benzene transfer operations at tank-truck loading racks.	☐YES ☐NO
	H.	**Subpart FF - National Emission Standard for Benzene Waste Operations**	
		Applicability	
	1.	The application area includes a chemical manufacturing plant, coke by-product recovery plant, or petroleum refinery facility as defined in § 61.341.	☐YES ☒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). *If the responses to Questions VII.H.1 and VII.H.2 are both "NO," go to Section VIII.*	☐YES ☒NO
	3.	The application area is located at a site that has no benzene onsite in wastes, products, byproducts, or intermediates. *If the response to Question VII.H.3 is "YES," go to Section VIII.*	☒YES ☐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). *If the response to Question VII.H.4 is "YES," go to Section VIII*	☐YES ☐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. *If the response to Question VII.H.5 is "YES," go to Section VIII.*	☐YES ☐NO

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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.	☐YES ☐NO
	7.	The application area has waste streams with flow-weighted annual average water content of 10% or greater.	☐YES ☐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).	☐YES ☐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.	☐YES ☐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.	☐YES ☐NO
	11.	The application area transfers waste off-site for treatment by another facility.	☐YES ☐NO
	12.	The application area is complying with 40 CFR § 61.342(d).	☐YES ☐NO
	13.	The application area is complying with 40 CFR § 61.342(e). *If the response to Question VII.H.13 is "NO," go to Question VII.H.15.*	☐YES ☐NO
	14.	The application area has facility waste with a flow weighted annual average water content of less than 10%.	☐YES ☐NO

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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. *If the response to Question VII.H.15 is "NO," go to Question VII.H.18.*	☐YES ☐NO
16.	The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers. *If the response to Question VII.H.16 is "YES," go to Question VII.H.18.*	☐YES ☐NO
17.	Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	☐YES ☐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. *If the response to Question VII.H.18 is "NO," go to Question VII.H.25.*	☐YES ☐NO
19.	The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. *If the response to Question VII.H.19 is "YES," go to Question VII.H.25.*	☐YES ☐NO
20.	The application area has individual drain systems complying with 40 CFR § 61.346(a). *If the response to Question VII.H.20 is "NO," go to Question VII.H.22.*	☐YES ☐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.	☐YES ☐NO

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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). *If the response to Question VII.H.22 is "NO," go to Question VII.H.25.*	☐YES ☐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.	☐YES ☐NO
	24.	Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device.	☐YES ☐NO
		Remediation Activities	
	25.	Remediation activities take place at the application area subject to 40 CFR Part 61, Subpart FF.	☐YES ☐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. *See instructions for 40 CFR Part 63 subparts made applicable only by reference.*	☒YES ☐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). *If the response to Question VIII.B.1 is "NO," go to Section VIII.D.*	☒YES ☐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)

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). *If the response to Question VIII.B.2 is "NO," go to Section VIII.D.*	☒YES ☐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.	☒YES ☐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.	☒YES ☐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 not 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. *If the response to Questions VIII.B.3, B.4 and B.5 are all "NO," go to Section VIII.D.*	☒YES ☐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		
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. *If the response to Question VIII.C.1 is "NO," go to Section VIII.D.*	☒YES ☐NO
2.	The application area includes fixed roofs, covers, and/or enclosures that are required to comply with 40 CFR § 63.148.	☒YES ☐NO
3.	The application area includes vapor collection systems or closed-vent systems that are required to comply with 40 CFR § 63.148. *If the response to Question VIII.C.3 is "NO," go to Question VIII.C.8.*	☒YES ☐NO
4.	The application area includes vapor collection systems or closed-vent systems that are constructed of hard-piping.	☒YES ☐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. *If the response to Question VIII.C.5 is "NO," go to Question VIII.C.8.*	☐YES ☒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.	☐YES ☐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.	☐YES ☐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)		
Reloading or Cleaning of Railcars, Tank Trucks, or Barges		
8.	The application area includes reloading and/or cleaning of railcars, tank trucks, or barges that deliver HAPs to a storage tank. *If the response to Question VIII.C.8 is "NO," go to Question VIII.C.11.*	☐YES ☒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.	☐YES ☐NO
10.	The application area includes operations that are complying with § 63.119(g)(6) through the use of a vapor balancing system.	☐YES ☐NO
Transfer Racks		
11.	The application area includes Group 1 transfer racks that load organic HAPs.	☐YES ☒NO
Process Wastewater Streams		
12.	The application area includes process wastewater streams. *If the response to Question VIII.C.12 is "NO," go to Question VIII.C.34.*	☒YES ☐NO
13.	The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Part 61, Subpart FF. *If the response to Question VIII.C.13 is "NO," go to Question VIII.C.15.*	☐YES ☒NO
14.	The application area includes process wastewater streams that are complying with 40 CFR §§ 63.110(e)(1)(i) and (e)(1)(ii).	☐YES ☐NO
15.	The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Part 61, Subpart F. *If the response to Question VIII.C.15 is "NO," go to Question VIII.C.17.*	☐YES ☒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)**		
16.	The application area includes process wastewater streams utilizing the compliance option specified in 40 CFR § 63.110(f)(4)(ii).	☐YES ☐NO
17.	The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Parts 260 through 272. *If the response to Question VIII.C.17 is "NO," go to Question VIII.C.20.*	☐YES ☒NO
18.	The application area includes process wastewater streams complying with 40 CFR § 63.110(e)(2)(i).	☐YES ☒NO
19.	The application are includes process wastewater streams complying with 40 CFR § 63.110(e)(2)(ii).	☐YES ☒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.	☐YES ☒NO
21.	The application area includes process wastewater streams, located at existing sources that are Group 2.	☐YES ☒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.	☐YES ☒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. (MeOH)	☒YES ☐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. *If the response to Question VIII.C.24 is "YES," go to Question VIII.C.34.*	☐YES ☒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. *If the response to Question VIII.C.25 is "NO," go to Question VIII.C.27.*	☐YES ☒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.	☐YES ☐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.	☐YES ☒NO
28.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. *If the responses to Questions VIII.C.27 - VIII.C.28 are both "NO," go to Question VIII.C.30.*	☐YES ☒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.	☐YES ☐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.	☐YES ☒NO

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Form OP-REQ1: Page 39		
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)		
Drains		
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. *If the response to Question VIII.C.31 is "NO," go to Question VIII.C.34.*	☐YES ☒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.	☐YES ☐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.	☐YES ☐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). (MeOH) *If the response to Question VIII.C.34 is "NO," go to Question VIII.C.39.*	☒YES ☐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). *If the response to Question VIII.C.35 is "NO," go to Question VIII.C.39.*	☐YES ☒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.	☐YES ☐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.	☐YES ☐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.	☐YES ☐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.	☐YES ☒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).	☐YES ☒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.	☐YES ☒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. *If the response to Question VIII.E.1 is "NO," go to Section VIII.F.*	☐YES ☒NO
2.	Sterilization facilities located in the application area are subject to 40 CFR Part 63, Subpart O. *If the response to Question VIII.E.2 is "NO," go to Section VIII.F.*	☐YES ☐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.	☐YES ☐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.	☐YES ☐NO
F.	**Subpart Q - National Emission Standards for Industrial Process Cooling Towers**	
1.	The application area includes industrial process cooling towers. *If the response to Question VIII.F.1 is "NO," go to Section VIII.G.*	☒YES ☐NO
2.	Chromium-based water treatment chemicals have been used on or after September 8, 1994.	☐YES ☒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.	☐YES ☒NO
2.	The application area includes a pipeline breakout station. *If the responses to Questions VIII.G.1 and VIII.G.2 are both "NO," go to Section VIII.H.*	☐YES ☒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. *If the response to Question VIII.G.3 is "YES," go to Question VIII.G.10.*	☐YES ☐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. *If the response to Question VIII.G.4 is "YES," go to Question VIII.G.10.*	☐YES ☐NO
5.	An emissions screening factor was calculated for the bulk gasoline terminal or pipeline breakout station. *If the response to Question VIII.G.5 is "NO," go to Question VIII.G.10.*	☐YES ☐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). *If the response to Question VIII.G.6 is "NO," go to Question VIII.G.10.*	☐YES ☐NO
7.	Emissions screening factor less than 0.5 (ET or EP < 0.5). *If the response to Question VIII.G.7 is "YES," go to Section VIII.H.*	☐YES ☐NO
8.	Emissions screening factor greater than or equal to 0.5, but less than 1.0 (0.5 ≤ ET or EP < 1.0). *If the response to Question VIII.G.8 is "YES," go to Section VIII.H.*	☐YES ☐NO
9.	Emissions screening factor greater than or equal to 1.0 (ET or EP ≥ 1.0). *If the response to Question VIII.G.9 is "YES," go to Question VIII.G.11.*	☐YES ☐NO
10.	The site at which the application area is located is a major source of HAP. *If the response to Question VIII.G.10 is "NO," go to Section VIII.H.*	☐YES ☐NO
11.	The application area is using an alternative leak monitoring program as described in 40 CFR § 63.424(f).	☐YES ☐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. *If the response to Question VIII.H.1 is "NO," go to Section VIII.I.*	☐YES ☒NO
2.	The application area uses processes and materials specified in 40 CFR § 63.440(a)(1) - (3). *If the response to Question VIII.H.2 is "NO," go to Section VIII.I.*	☐YES ☐NO
3.	The application area includes one or more sources subject to 40 CFR Part 63, Subpart S that are existing sources. *If the response to Question VIII.H.3 is "NO," go to Section VIII.I.*	☐YES ☐NO
4.	The application area includes one or more kraft pulping systems that are existing sources.	☐YES ☐NO
5.	The application area includes one or more dissolving-grade bleaching systems that are existing sources at a kraft or sulfite pulping mill.	☐YES ☐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. *If the response to Question VIII.H.6 is "NO," go to Section VIII.I.*	☐YES ☐NO
7.	The application area includes bleaching systems that are complying with 40 CFR § 63.440(d)(3)(i).	☐YES ☐NO
8.	The application area includes bleaching systems that are complying with 40 CFR § 63.440(d)(3)(ii).	☐YES ☐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)

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.	☐YES ☒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.	☐YES ☒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.	☐YES ☒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. *If the response to Question VIII.J.1 is "NO," go to Section VIII.K.*	☐YES ☒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. *If the response to Question VIII.J.2 is "NO," go to Section VIII.K.*	☐YES ☐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.	☐YES ☐NO
4.	The application area includes process wastewater streams that are Group 2 for organic HAPs as defined in 40 CFR § 63.482.	☐YES ☐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. *If the response to Question VIII.J.5 is "YES," go to Question VIII.J.15.*	☐YES ☐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. *If the response to Question VIII.J.6 is "NO," go to Question VIII.J.8.*	☐YES ☐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.	☐YES ☐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.	☐YES ☐NO
9.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. *If the responses to Questions VIII.J.8 - VIII.J.9 are both "NO," go to Question VIII.J.11.*	☐YES ☐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.	☐YES ☐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.	☐YES ☐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. *If the response to Question VIII.J.12 is "NO," go to Question VIII.J.15.*	☐YES ☐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.	☐YES ☐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.	☐YES ☐NO
	15. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of an elastomer product process unit. *If the response to Question VIII.J.15 is "NO," go to Section VIII.K.*	☐YES ☐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). *If the response to Question VIII.J.16 is "NO," go to Section VIII.K.*	☐YES ☐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)**	
	***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.	☐YES ☐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.	☐YES ☐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.	☐YES ☐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. *If the response to Question VIII.K.1 is "NO" or "N/A," go to Section VIII.L.*	☐YES ☒NO ☐N/A
2.	The application area includes a BLR and/or WSR research and development facility.	☐YES ☐NO

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

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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. *If the response to Question VIII.L.1 is "NO" or "N/A," go to Section VIII.M.*	☐YES ☒NO ☐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.	☐YES ☐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.	☐YES ☒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). *If the response to Question VIII.N.1 is "NO," go to Section VIII.O.*	☐YES ☒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). *If the response to Question VIII.N.2 is "YES," go to Section VIII.O.*	☐YES ☐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). *If the response to Question VIII.N.3 is "NO," go to Section VIII.O.*	☐YES ☐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. *If the response to Question VIII.N.4 is "NO," go to Section VIII.O.*	☐YES ☐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.	☐YES ☐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.	☐YES ☐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. *If the response to Question VIII.N.7 is "NO," go to Section VIII.O.*	☐YES ☐NO
8.	The application area includes Group 1 or Group 2 wastewater streams that are complying with 40 CFR § 63.640(o)(2)(i).	☐YES ☐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). *If the response to Question VIII.N.9 is "NO," go to Section VIII.O.*	☐YES ☐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.	☐YES ☐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).	☐YES ☐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).	☐YES ☐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). *If the response to Question VIII.O.1 is "NO" or "N/A," go to Section VIII.P*	☐YES ☒NO ☐N/A
2.	Materials specified in 40 CFR § 63.680(b)(2) are received at the application area.	☐YES ☐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.	☐YES ☐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).	☐YES ☐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."	☐YES ☐NO
	6.	The predominant activity in the application area is the treatment of wastewater received from off-site.	☐YES ☐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).	☐YES ☐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.	☐YES ☐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).	☐YES ☐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. *If the response to Question VIII.O.10 is "YES," go to Section VIII.P.*	☐YES ☐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. *If the response to Question VIII.O.11 is "NO," go to Question VIII.O.14.*	☐YES ☐NO
12.	VOHAP concentration is determined by direct measurement.	☐YES ☐NO
13.	VOHAP concentration is based on knowledge of the off-site material.	☐YES ☐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. *If the response to Question VIII.O.14 is "NO," go to Question VIII.O.17.*	☐YES ☐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.	☐YES ☐NO
16.	An equipment component in the application area is intended to operate 300 hours or more during a 12-month period.	☐YES ☐NO
17.	The application area includes containers that manage non-exempt off-site material.	☐YES ☐NO
18.	The application area includes individual drain systems that manage non-exempt off-site materials.	☐YES ☐NO

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Form OP-REQ1: Page 53			
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. *If the response to Question VIII.P.1 is "NO" or "N/A," go to Section VIII.Q.*	☐YES ☒NO ☐N/A
	2.	The application area includes one or more of the affected sources specified in 40 CFR § 63.741(c)(1) - (7).	☐YES ☐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.	☐YES ☒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. *For SOP applications, if the responses to Questions VIII.Q.1 and VIII.Q.2 are both "NO," go to Section VIII.R.* *For GOP applications, if the responses to Questions VIII.Q.1 and VIII.Q.2 are both "NO," go to Section VIII.Z.*	☐YES ☒NO
♦	3.	The application area contains only facilities that exclusively process, store or transfer black oil as defined in § 63.761. *For SOP applications, if the response to Question VIII.Q.3 is "YES," go to Section VIII.R.* *For GOP applications, if the response to Question VIII.Q.3 is "YES," go to Section VIII.Z.*	☐YES ☐NO
♦	4.	The application area is located at a site that is a major source of HAP. *If the response to Question VIII.Q.4 is "NO," go to Question VIII.Q.6.*	☐YES ☐NO

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Form OP-REQ1: Page 54

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.	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 ft^3) per day and a facility-wide actual annual average hydrocarbon liquid throughput less than 39,700 liters (10,487.6 gallons) per day. *For SOP applications, if the response to Question VIII.Q.5 is "YES," go to Section VIII.R.* *For GOP applications, if the response to Question VIII.Q.5 is "YES," go to Section VIII.Z.* *For all applications, if the response to Question VIII.Q.5 is "NO," go to Question VIII.Q.9.*	☐YES ☐NO
♦	6.	The application area includes a triethylene glycol (TEG) dehydration unit. *For SOP applications, f 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.*	☐YES ☐NO
♦	7.	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.	☐YES ☐NO
♦	8.	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.	☐YES ☐NO
♦	9.	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).	☐YES ☐NO

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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. *If the response to Question VIII.R.1 is "NO," go to Section VIII.S.*	☐YES ☒NO
	2.	Shipbuilding or ship repair operations located in the application area are subject to 40 CFR Part 63, Subpart II.	☐YES ☐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. *If the response to Question VIII.S.1 is "NO" or "N/A," go to Section VIII.T.*	☐YES ☒NO ☐N/A
	2.	The application area meets the definition of an "incidental wood manufacturer" as defined in 40 CFR § 63.801.	☐YES ☐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.	☐YES ☒NO ☐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. *If the response to Question VIII.U.1 is "NO," go to Section VIII.V.*	☐YES ☒NO
	2.	The application area includes containers using Container Level 1 controls.	☐YES ☐NO
	3.	The application area includes containers using Container Level 2 controls.	☐YES ☐NO

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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.	☐YES ☐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.	☐YES ☒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.	☐YES ☒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. *If the responses to Questions VIII.W.1 and VIII.W.2 are both "NO," go to Question VIII.W.20.*	☐YES ☒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).	☐YES ☐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).	☐YES ☐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.	☐YES ☐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. *If the response to Question VIII.W.6 is "NO," go to Question VIII.W.8.*	☐YES ☐NO

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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.	☐YES ☐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.	☐YES ☐NO
9.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. *If the responses to Questions VIII.W.8 and W.9 are both "NO," go to Question VIII.W.11.*	☐YES ☐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.	☐YES ☐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.	☐YES ☐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. *If the response to Question VIII.W.12 is "NO," go to Question VIII.W.15.*	☐YES ☐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.	☐YES ☐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.	☐YES ☐NO

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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. *If the response to Question VIII.W.15 is "NO," go to Question VIII.W.20.*	☐YES ☐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). *If the response to Question VIII.W.16 is "NO," go to Question VIII.W.20.*	☐YES ☐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.	☐YES ☐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.	☐YES ☐NO

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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.	☐YES ☐NO
20.	The application area includes an ethylene production process unit.	☐YES ☒NO ☐N/A
21.	The application area includes waste streams generated from an ethylene production process unit. *If the responses to Questions VIII.W.20 and VIII.W.21 are both "NO" or "N/A," go to Question VIII.W.54.*	☐YES ☒NO ☐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). *If the response to Question VIII.W.22 is "NO," go to Question VIII.W.54.*	☐YES ☐NO
23.	Waste stream(s) are transferred off-site for treatment. *If the response to Question VIII.W.23 is "NO," go to Question VIII.W.25.*	☐YES ☐NO
24.	The application area has waste management units that treat or manage waste stream(s) prior to transfer off-site for treatment. *If the response to Question VIII.W.24 is "NO," go to Question VIII.W.54.*	☐YES ☐NO

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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).	☐YES ☐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). *If the response to Question VIII.W.26 is "NO," go to Question VIII.W.43.*	☐YES ☐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. *If the response to Question VIII.W.27 is "NO," go to Question VIII.W.43.*	☐YES ☐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). *If the response to Question VIII.W.28 is "NO," go to Question VIII.W.33.*	☐YES ☐NO
29.	The application area includes containers that receive, manage, or treat a continuous butadiene waste stream.	☐YES ☐NO
30.	The application area includes individual drain systems that receive, manage, or treat a continuous butadiene waste stream. *If the response to Question VIII.W.30 is "NO," go to Question VIII.W.43.*	☐YES ☐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.	☐YES ☐NO

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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. *If the response to Question VIII.W.32 is required, go to Question VIII.W.43.*	☐YES ☐NO
33.	The application area has containers, as defined in 40 CFR § 61.341, that receive a continuous butadiene waste stream. *If the response to Question VIII.W.33 is "NO," go to Question VIII.W.36.*	☐YES ☐NO
34.	The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers. *If the response to Question VIII.W.34 is "YES," go to Question VIII.W.36.*	☐YES ☐NO
35.	Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	☐YES ☐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. *If the response to Question VIII.W.36 is "NO," go to Question VIII.W.43.*	☐YES ☐NO
37.	The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. *If the response to Question VIII.W.37 is "YES," go to Question VIII.W.43.*	☐YES ☐NO

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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). *If the response to Question VIII.W.38 is "NO," go to Question VIII.W.40.*	☐YES ☐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.	☐YES ☐NO
40.	The application area has individual drain systems complying with 40 CFR § 61.346(b). *If the response to Question VIII.W.40 is "NO," go to Question VIII.W.43.*	☐YES ☐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.	☐YES ☐NO
42.	Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device.	☐YES ☐NO
43.	The application area has at least one waste stream that contains benzene. *If the response to Question VIII.W.43 is "NO," go to Question VIII.W.54.*	☐YES ☐NO
44.	The application area has containers, as defined in 40 CFR § 61.341, that receive a waste stream containing benzene. *If the response to Question VIII.W.44 is "NO," go to Question VIII.W.47.*	☐YES ☐NO
45.	The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers. *If the response to Question VIII.W.45 is "YES," go to Question VIII.W.47.*	☐YES ☐NO

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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.	☐YES ☐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. *If the response to Question VIII.W.47 is "NO," go to Question VIII.W.54.*	☐YES ☐NO
	48.	The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. *If the response to Question VIII.W.48 is "YES," go to Question VIII.W.54.*	☐YES ☐NO
	49.	The application area has individual drain systems complying with 40 CFR § 61.346(a). *If the response to Question VIII.W.49 is "NO," go to Question VIII.W.51.*	☐YES ☐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.	☐YES ☐NO
	51.	The application area has individual drain systems complying with 40 CFR § 61.346(b). *If the response to Question VIII.W.51 is "NO," go to Question VIII.W.54.*	☐YES ☐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.	☐YES ☐NO

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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.	☐YES ☐NO
	54.	The application area contains a cyanide chemicals manufacturing process. *If the response to Question VIII.W.54 is "NO," go to Section VIII.X.*	☐YES ☒NO
	55.	The cyanide chemicals manufacturing process generates maintenance wastewater containing hydrogen cyanide or acetonitrile.	☐YES ☐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. *If the response to Question VIII.X.1 is "NO," go to Section VIII.Y.*	☐YES ☒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. *If the response to Question VIII.X.2 is "NO," go to Section VIII.Y.*	☐YES ☐NO
	3.	All process wastewater streams generated or managed in the application area are from sources producing polystyrene. *If the response to Question VIII.X.3 is "YES," go to Section VIII.Y.*	☐YES ☐NO
	4.	All process wastewater streams generated or managed in the application area are from sources producing ASA/AMSAN. *If the response to Question VIII.X.4 is "YES," go to Section VIII.Y.*	☐YES ☐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.	☐YES ☐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.	☐YES ☐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.	☐YES ☐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. *If the response to Question VIII.X.8 is "YES," go to Question VIII.X.18.*	☐YES ☐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. *If the response to Question VIII.X.9 is "NO," go to Question VIII.X.11.*	☐YES ☐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.	☐YES ☐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.	☐YES ☐NO
12.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. *If the responses to Questions VIII.X.11 - VIII.X.12 are both "NO," go to Question VIII.X.14.*	☐YES ☐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.	☐YES ☐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.	☐YES ☐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. *If the response to Question VIII.X.15 is "NO," go to Question VIII.X.18.*	☐YES ☐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.	☐YES ☐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.	☐YES ☐NO
	18. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of an thermoplastic product process unit. *If the response to Question VIII.X.18 is "NO," go to Section VIII.Y.*	☐YES ☐NO

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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)		
***Drains* (continued)**		
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). *If the response to Question VIII.X.19 is "NO," go to Section VIII.Y.*	☐YES ☐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.	☐YES ☐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.	☐YES ☐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	☐YES ☐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)			
	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.	☐YES ☒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.	☐YES ☒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).	☐YES ☒NO
	2.	The application area is located at a plant site that is a major source as defined in FCAA § 112(a).	☒YES ☐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. *If the response to Question VIII.AA.1, AA.2 or AA.3 is "NO," go to Section VIII.BB.*	☐YES ☒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. *If the response to Question VIII.AA.4 is "NO," go to Section VIII.BB.*	☐YES ☐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. *If the response to Question VIII.AA.5 is "NO," go to Question VIII.AA.18.*	☐YES ☐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.	☐YES ☐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.	☐YES ☐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. *If the response to Question VIII.AA.8 is "YES," go to Section VIII.AA.22.*	☐YES ☐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. *If the response to Question VIII.AA.9 is "NO," go to Question VIII.AA.11.*	☐YES ☐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.	☐YES ☐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.	☐YES ☐NO
12.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. *If the responses to Questions VIII.AA.11 and VIII.AA.12 are both "NO," go to Question VIII.AA.18.*	☐YES ☐NO

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Form OP-REQ1: Page 70		
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). *If the response to Question VIII.AA.13 is "NO," go to Question VIII.AA.15.*	☐YES ☐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.	☐YES ☐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. *If the response to Question VIII.AA.15 is "NO," go to Question VIII.AA.17.*	☐YES ☐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.	☐YES ☐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.	☐YES ☐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.	☐YES ☐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. *If the response to Question VIII.AA.19 is "NO," go to Question VIII.AA.22.*	☐YES ☐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.	☐YES ☐NO

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Form OP-REQ1: Page 71		
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.	☐YES ☐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). *If the response to Question VIII.AA.22 is "NO," go to Section VIII.BB.*	☐YES ☐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). *If the response to Question VIII.AA.23 is "NO," go to Section VIII.BB.*	☐YES ☐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.	☐YES ☐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.	☐YES ☐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.	☐YES ☐NO

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Form OP-REQ1: Page 72		
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.	☐YES ☒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. *If the answer to Question VIII.CC.1 is "NO," go to Section VIII.DD.*	☐YES ☒NO
2.	The application area is located at a site that is a major source of HAP. *If the answer to Question VIII.CC.2 is "NO," go to Section VIII.DD.*	☐YES ☐NO
3.	All site remediation's qualify for one of the exemptions contained in 40 CFR § 63.7881(b)(1) through (6). *If the answer to Question VIII.CC.3 is "YES," go to Section VIII.DD.*	☐YES ☐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. *If the answer to Question VIII.CC.4 is "YES," go to Section VIII.DD.*	☐YES ☐NO
5.	The site remediation will be completed within 30 consecutive calendar days.	☐YES ☐NO
6.	No site remediation will exceed 30 consecutive calendar days. *If the answer to Question VIII.CC.6 is "YES," go to Section VIII.DD.*	☐YES ☐NO
7.	Site remediation materials subject to 40 CFR Part 63, Subpart GGGGG are transferred from the application area to an off-site facility.	☐YES ☐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. *If the answer to Question VIII.CC.8 is "YES," go to Section VIII.DD.*	☐YES ☐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. *If the response to Question VIII.CC.9 is "NO," go to Question VIII.CC.14.*	☐YES ☐NO
10.	The application area includes containers using Container Level 1 controls as specified in 40 CFR § 63.922(b).	☐YES ☐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).	☐YES ☐NO
12.	The application area includes containers using Container Level 2 controls as specified in 40 CFR § 63.923(b).	☐YES ☐NO
13.	The application area includes containers using Container Level 3 controls as specified in 40 CFR § 63.924(b).	☐YES ☐NO
14.	The application area includes individual drain systems complying with the requirements of 40 CFR § 63.962.	☐YES ☐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. *If the response to Question VIII.DD.1 is "NO," go to Section VIII.EE.*	☐YES ☒NO
2.	The EAF steelmaking facility is a research and development facility. *If the response to Question VIII.DD.2 is "YES," go to Section VIII.EE.*	☐YES ☐NO
3.	Metallic scrap is utilized in the EAF.	☐YES ☐NO
4.	Scrap containing motor vehicle scrap is utilized in the EAF.	☐YES ☐NO
5.	Scrap not containing motor vehicle scrap is utilized in the EAF.	☐YES ☐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. *If the answer to Question EE.1 is "NO," go to Section VIII.FF.*	☐YES ☒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.	☐YES ☐NO
3.	The application area includes a pipeline pumping station as defined in 40 CFR Part 63, Subpart BBBBBB.	☐YES ☐NO
4.	The application area includes a bulk gasoline plant as defined in 40 CFR Part 63, Subpart BBBBBB. *If the answer to Question VIII.EE.4 is "NO," go to Question VIII.EE.6.*	☐YES ☐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).	☐YES ☐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. *If the answer to Question VIII.EE.6 is "NO," go to Section VIII.FF.*	☐YES ☐NO
7.	The bulk gasoline terminal has throughput of less than 250,000 gallons per day. *If the answer to Question VIII.EE.7 is "YES," go to Section VIII.FF.*	☐YES ☐NO
8.	The bulk gasoline terminal loads gasoline into gasoline cargo tanks other than railcar cargo tanks.	☐YES ☐NO
9.	The bulk gasoline terminal loads gasoline into railcar cargo tanks. *If the answer to Question VIII.EE.9 is "NO," go to Section VIII.FF.*	☐YES ☐NO
10.	The bulk gasoline terminal loads gasoline into railcar cargo tanks which do not collect vapors from a vapor balance system.	☐YES ☐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.	☐YES ☐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. *If the answer to Question VIII.FF.1 is "NO," go to Section VIII.GG.*	☐YES ☒NO
♦	2.	The application area includes at least one gasoline dispensing facility as defined in 40 CFR § 63.11132. *If the answer to Question VIII.FF.2 is "NO," go to Section VIII.GG.*	☐YES ☐NO
♦	3.	The application area includes at least one gasoline dispensing facility with a monthly throughput of less than 10,000 gallons.	☐YES ☐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.	☐YES ☐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. *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.*	☒YES ☐NO
♦	2.	Provide the Subpart designation (i.e. Subpart EEE) in the space provided below. **Subpart DDDDD NESHAP for Boilers and Process Heaters;** **Subpart ZZZZ NESHAP for Reciprocating Internal Combustion Engines**	

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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.	☒YES ☐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.	☐YES ☒NO ☐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.	☐YES ☒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.	☐YES ☒NO ☐N/A	
	D.	**Subpart D - Federal Procurement**		
♦	1.	The application area is owned/operated by a department, agency, or instrumentality of the United States.	☐YES ☒NO ☐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.	☐YES ☒NO ☐N/A	
♦	2.	The application area is a manufacturer, importer, wholesaler, distributor, or retailer of products containing a Class I or Class II substance.	☐YES ☒NO ☐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.	☐YES ☒NO ☐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.	☐YES	☒NO
♦	2.	Disposal of appliances (including motor vehicle air conditioners) or refrigerant or non-exempt substitute reclamation occurs in the application area.	☐YES	☒NO ☐N/A
♦	3.	The application area manufactures appliances or refrigerant recycling and recovery equipment.	☐YES	☒NO ☐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. *If the response to Question X.G.1 is "NO" or "N/A," go to Section X.H.*	☐YES	☒NO ☐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).	☐YES	☐NO ☐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.	☐YES	☒NO ☐N/A
♦	2.	Disposal of halons or manufacturing of halon blends is conducted in the application area.	☐YES	☒NO ☐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.	☒YES	☐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. *If the response to Question XI.B.1 is "NO" or "N/A," go to Section XI.C.*	☒YES ☐NO ☐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.	
♦			40 CFR Part 63 Subpart DDDDD, 40 CFR Part 63 Subpart ZZZZ, 40 CFR Part 65	
	C.	**Emission Limitation Certifications**		
♦		1.	The application area includes units for which federally enforceable emission limitations have been established by certification.	☒YES ☐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).	☐YES ☒NO
		2.	The application area includes units located at the site that are subject to a site-specific requirement of the SIP.	☐YES ☒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. *If the response to Question XI.D.3 is "YES," please include a copy of the approval document with the application.*	☐YES ☒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. *If the response to Question XI.D.4 is "YES," please include a copy of the approval document with the application.*	☒YES ☐NO

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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.	☐YES ☒NO
	2.	The application area includes emission units qualifying for the new unit exemption under 40 CFR § 72.7.	☐YES ☒NO
	3.	The application area includes emission units qualifying for the retired unit exemption under 40 CFR § 72.8.	☐YES ☒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. *If the response to Question XI.F.1 is "NO," go to Question XI.F.7.*	☐YES ☒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.	☐YES ☐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.	☐YES ☐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.	☐YES ☐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.	☐YES ☐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.	☐YES ☐NO
	7.	The application area includes emission units that qualify for the CSAPR NO_X Ozone Season Group 2 retired unit exemption.	☐YES ☒NO

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XI.	**Miscellaneous (continued)**		
	G.	**40 CFR Part 97, Subpart FFFFF - Texas SO_2 Trading Program**	
	1.	The application area includes emission units complying with the requirements of the Texas SO_2 Trading Program. *If the response to Question XI.G.1 is "NO," go to Question XI.G.6.*	☐YES ☒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.	☐YES ☐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.	☐YES ☐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.	☐YES ☐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.	☐YES ☐NO
	6.	The application area includes emission units that qualify for the Texas SO_2 Trading Program retired unit exemption.	☐YES ☒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.	☒YES ☐NO

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For SOP applications, answer ALL questions unless otherwise directed.
♦ *For GOP applications, answer ONLY these questions unless otherwise directed.*

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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.	☐YES ☐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.	☐YES ☐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.	☐YES ☐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.	☐YES ☐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.	☐YES ☐NO
	J.	**Title 30 TAC Chapter 101, Subchapter H**	
♦	1.	The application area is located in a nonattainment area. *If the response to Question XI.J.1 is "NO," go to question XI.J.3.*	☐YES ☒NO
♦	2.	The applicant has or will generate emission reductions to be credited in the TCEQ Emissions Banking and Trading Program.	☐YES ☐NO ☐N/A
♦	3.	The applicant has or will generate discrete emission reductions to be credited in the TCEQ Emissions Banking and Trading Program.	☐YES ☒NO ☐N/A

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For SOP applications, answer ALL questions unless otherwise directed.
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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.	☐YES ☒NO
♦	5.	The application area includes an electric generating facility permitted under 30 TAC Chapter 116, Subchapter I.	☐YES ☒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.	☐YES ☒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.	☐YES ☒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.	☐YES ☒NO
♦	2.	The permit currently contains at least one periodic monitoring requirement. *If the responses to Questions XI.K.1 and XI.K.2 are both "NO," go to Section XI.L.*	☒YES ☐NO
♦	3.	All periodic monitoring requirements are being removed from the permit with this application.	☐YES ☒NO

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For SOP applications, answer ALL questions unless otherwise directed.
♦ *For GOP applications, answer ONLY these questions unless otherwise directed.*

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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. *If the response to Question XI.L.1 is "NO," go to Section XI.M.*	☒YES ☐NO
♦	2.	The unit or units defined by XI.L.1 are using a control device to comply with an applicable requirement. *If the response to Question XI.L.2 is "NO," go to Section XI.M.*	☒YES ☐NO
♦	3.	The permit holder has submitted a CAM proposal on Form OP-MON in a previous application.	☐YES ☒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. *If the responses to Questions XI.L.3 and XI.L.4 are both "NO," go to Section XI.M.*	☒YES ☐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.	☐YES ☒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).	☒YES ☐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). *If the response to Question XI.L.8 is "YES," go to Section XI.M.*	☐YES ☒NO

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For SOP applications, answer ALL questions unless otherwise directed.
♦ *For GOP applications, answer ONLY these questions unless otherwise directed.*

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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.	☐YES	☒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.	☒YES	☐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.	☐YES	☒NO
♦	12.	The control device in the CAM proposal as described by question XI.L.3 or XI.L.4 has a bypass.	☐YES	☒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. *If the response to Question XI.M.1 is "NO," or "N/A," go to Section XII.*	☐YES	☒NO ☐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.	☐YES	☐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. *If the response to XII.A.1 is "YES," include the waste permit numbers and issuance date in Section XII.J.*	☐YES	☒NO

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For SOP applications, answer ALL questions unless otherwise directed.
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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. RN174371 *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.*	☒YES ☐NO
♦	2.	The application area includes at least one "State Pollution Control Project" Air Quality Standard Permit NSR authorization under 30 TAC § 116.617.	☒YES ☐NO
♦	3.	The application area includes at least one non-rule Air Quality Standard Permit for Pollution Control Projects NSR authorization.	☐YES ☒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.	☐YES ☒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.	☐YES ☒NO
♦	6.	The application area includes at least one "Municipal Solid Waste Landfill" Air Quality Standard Permit NSR authorization under 30 TAC § 116.621.	☐YES ☒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.	☐YES ☒NO
	8.	The application area includes at least one "Concrete Batch Plant" Air Quality Standard Permit NSR authorization.	☐YES ☒NO
♦	9.	The application area includes at least one "Concrete Batch Plant with Enhanced Controls" Air Quality Standard Permit NSR authorization.	☐YES ☒NO
♦	10.	The application area includes at least one "Hot Mix Asphalt Plant" Air Quality Standard Permit NSR authorization.	☐YES ☒NO

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For SOP applications, answer ALL questions unless otherwise directed.
♦ *For GOP applications, answer ONLY these questions unless otherwise directed.*

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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.	☐YES ☒NO
♦	12.	The application area includes at least one "Electric Generating Unit" Air Quality Standard Permit NSR authorization. *If the response to XII.B.12 is "NO," go to Question XII.B.15.*	☐YES ☒NO
♦	13.	For purposes of "Electric Generating Unit" Air Quality Standard Permit, the application area is located in the East Texas Region.	☐YES ☒NO
♦	14.	For purposes of "Electric Generating Unit" Air Quality Standard Permit, the application area is located in the West Texas Region.	☐YES ☒NO
♦	15.	The application area includes at least one "Boiler" Air Quality Standard Permit NSR authorization.	☐YES ☒NO
♦	16.	The application area includes at least one "Sawmill" Air Quality Standard Permit NSR authorization.	☐YES ☒NO
	C.	**Flexible Permits**	
	1.	The application area includes at least one Flexible Permit NSR authorization.	☐YES ☒NO
	D.	**Multiple Plant Permits**	
	1.	The application area includes at least one Multi-Plant Permit NSR authorization.	☐YES ☒NO

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For SOP applications, answer ALL questions unless otherwise directed.
♦ *For GOP applications, answer ONLY these questions unless otherwise directed.*

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XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)

E. PSD Permits and PSD Major Pollutants

PSD Permit No.: PSDTX1340	Issuance Date: 06/17/2020	Pollutant(s): VOC, NOX, CO, PM, PM10
PSD Permit No.: GHGPSDTX54	Issuance Date: 06/17/2020	Pollutant(s): GHG
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.: 107764	Issuance Date: 06/17/2020	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.: 174371	Issuance Date: 11/14/2023	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:

Date:	2/21/2024
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XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)

♦ I. Permits by Rule (30 TAC Chapter 106) for the Application Area

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.

PBR No.: 106.227	Version No./Date: 09/04/2000
PBR No.: 106.263	Version No./Date: 11/01/2001
PBR No.: 106.265	Version No./Date: 09/04/2000
PBR No.: 106.371	Version No./Date: 09/04/2000
PBR No.: 106.373	Version No./Date: 09/04/2000
PBR No.: 106.452	Version No./Date: 09/04/2000
PBR No.: 106.472	Version No./Date: 09/04/2000
PBR No.: 106.474	Version No./Date: 09/04/2000
PBR No.: 106.511	Version No./Date: 09/04/2000
PBR No.: 106.532	Version No./Date: 09/04/2000
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:
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.
2/21/2024	O3963	RN106586795

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/SupersededRequirement Citation	Negative Applicability/Superseded Requirement Reason
		GRP-TKMEOH	OP-UA3	MACT EEEE	§63.2338(c)(1)	Part of an affected source under another 40 CFR Part 63 subpart (MACT G).
		GRP-TKMEOH	OP-UA3	NSPS Kb	§63.110(b)(1)	Tanks are MACT G Group 1 storage vessels.
		TK-03007	OP-UA3	MACT EEEE	§63.2338(c)(1)	Part of an affected source under another 40 CFR Part 63 subpart (MACT G).
		TK-03007	OP-UA3	MACT G, Storage	§63.101	Vessel capacity is less than 38 cubic meters, and does not meet “storage tank’ definition.
		TK-03007	OP-UA3	MACT G, Process Wastewater	§63.111	Not a “process wastewater” management unit. Only receives “maintenance wastewater.”
		TK-03007	OP-UA3	NSPS Kb	§60.110b(a)	Storage capacity is less than 75 cubic meters.
		B-01001	OP-UA5	NSPS D	§60.40(a)	Unit does not burn fossil fuel for the purpose of producing steam by heat transfer.
		B-01001	OP-UA5	NSPS Db	§60.40b(a)	Unit is a process heater and not a steam generating unit.
		B-01001	OP-UA5	NSPS Dc	§60.40c(a)	Unit is a process heater and not a steam generating unit.

		B-01001	OP-UA5	Chapter 117	§117.103(a)(1)	New unit placed into service after November 15, 1992.
		B-01001FG	OP-UA15	MACT G	§63.107(h)(3)	Gas stream going to fuel gas system.
		B-01002	OP-UA6	NPSP D	§60.40b(j)	Boiler meets applicability requirements under 60.40b(a) of NSPS Db.
		B-01002	OP-UA6	NSPS Dc	§60.40c(a)	Boiler has minimum fuel heat input capacity greater than 20 MW.
		B-01002	OP-UA6	Chapter 117	§117.103(a)(1)	New unit placed into service after November 15, 1992.
		B-01002FG	OP-UA15	MACT G	§63.107(h)(3)	Gas stream going to fuel gas system.
		B-14001	OP-UA6	NSPS D	§60.40b(j)	Boiler meets applicability requirements under 60.40b(a) of NSPS Db.
		B-14001	OP-UA6	NSPS Dc	§60.40c(a)	Boiler has minimum fuel heat input capacity greater than 20 MW.
		B-14001	OP-UA6	Chapter 117	§117.103(a)(1)	New unit places into service after November 15, 1992.
		B-14001FG	OP-U15	MACT G	§63.107(h)(3)	Gas stream going to fuel gas system.
		S-10001VT	OP-UA15	NSPS NNN	§63.110(d)(4)	Vent is a MACT G Group 1 process vent.
		S-10001VT	OP-UA15	NSPS RRR	§63.110(d)(7)	Vent is a MACT G Group 1 process vent.
		FUG-MEOH	OP-UA12	NSPS VVa	§63.160(b)(1)	MACT H applies to the equipment.
		FUG-MEOH	OP-UA12	MACT EEEE	§63.2332(c)(1)	Part of an affected source under 40 CFR Part 63 subpart (MACT G).
		H-EMG	OP-UA02	Chapter 117	§117.103(a)(1)	New unit placed into service after November 15, 1992.
		H-FWP1	OP-UA02	Chapter 117	§117.103(a)(1)	New unit placed into service after November 15, 1992.

		H-FWP2	OP-UA02	Chapter 117	§117.103(a)(1)	New unit placed into service after November 15, 1992.
		T-06001	REQ-2	MACT Q	§63.400(a)	No chromium-based treatment chemicals will be added to cooling water.
		GRP-TKDSL1	OP-UA3	NSPS Kb	§60.110b(a)	Storage capacity is less than 75 cubic meters.
		GRP-TKDSL1	OP-UA3	NSPS Kb	§60.110b(a)	Storage capacity is less than 75 cubic meters.

Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program

Table 1a: Additions

Date: 2/21/2024	**Regulated Entity No.: RN106586795**	**Permit No.: O3963**
Company Name: Natgasoline LLC	**Area Name: Methanol Plant**	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
1	TANKVCUN	OP-UA01			Chapter 116	§116.602
2	TANKVCUP	OP-UA01			Chapter 116	§116.602

Applicable Requirements Summary
Form OP-REQ3 (Page 3)
Federal Operating Permit Program

Table 2a: Deletions

Date: 2/21/2024	**Regulated Entity No.: RN106586795**	**Permit No.: O3963**
Company Name: Natgasoline LLC	**Area Name: Methanol Plant**	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
3	B-01001, B-14001	OP-UA06 OP-UA01 OP-UA05		NH_3		
4	TK-03007	OP-UA01		VOC MEOH		
5	F-10001	NONE		NO_X CO VOC MEOH SO_2		
6	D-04001	NONE		VOC MEOH		

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.: NA	RN No.: 106586795	CN: 604256412
Permit No.: O3963	Project No.: 26047	
Area Name: Methanol Plant		
Company Name: Natgasoline LLC		
II. Unit/Emission Point/Group/Process Information		
Revision No.:		
Unit/EPN/Group/Process ID No.:		
Applicable Form:		
III. Applicable Regulatory Requirement		
Name:		
SOP/GOP Index No.:		
Pollutant: VOC		
Main Standard:		
IV. Title V Monitoring Information		
Monitoring Type:		
Unit Size: SM		
CAM/PM Option No.:		
Deviation Limit:		
CAM/PM Option No.:		
Deviation Limit:		
V. Control Device Information		
Control Device ID No.:		
Control Device Type:		

Texas Commission on Environmental Quality
Monitoring Requirements
Form OP-MON (Page 2)
Federal Operating Permit Program

Table 1b: CAM/PM Control Device Additions

Emission Unit ID No.	Control Device ID No.	Control Device Type

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
2/21/2024	O3963	RN106586795

Unit ID No.	PBR No.	Version No./Date
F-07501	106.472	09/04/2000
N/A	106.227	09/04/2000
N/A	106.371	09/04/2000
N/A	106.452	09/04/2000
N/A	106.454	11/01/2001
N/A	106.471/106.478	09/04/2000
N/A	106.511	09/04/2000
N/A	106.532	09/04/2000
N/A	106.263	11/01/2001
N/A	106.265	09/04/2000
N/A	106.373	09/04/2000
N/A	106.474	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

PBR No.	Version No./Date

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
2/21/2024	O3963	RN106586795

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
F-07501	106.472	09/04/2000	N/A
N/A	106.227	09/04/2000	N/A
N/A	106.371	09/04/2000	N/A
N/A	106.452	09/04/2000	N/A
N/A	106.454	11/01/2001	N/A
N/A	106.471/106.478	09/04/2000	N/A
N/A	106.511	09/04/2000	N/A
N/A	106.532	09/04/2000	N/A
N/A	106.263	11/01/2001	N/A
N/A	106.265	09/04/2000	N/A
N/A	106.373	09/04/2000	N/A
N/A	106.474	09/04/2000	N/A

Major NSR Summary Table

Permits Numbers: 107764 and PSDTX1340					Issuance Date: Draft		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.
B-01001	Reformer	NOx	23.28	58.69	3, 10, 24, 25, 27	3, 24, 25, 27	3, 24, 25
B-01001	Reformer	NOx (6)	62.08	6.83	10, 24	24	24
B-01001	Reformer	NH3	5.71	21.57	10, 24, 25, 27	24, 25, 27	24, 25
B-01001	Reformer	CO	93.84	124.18	10, 24, 25, 27	24, 25, 27	24, 25
B-01001	Reformer	VOC	8.37	10.16	10		
B-01001	Reformer	SO2	1.52	5.75	7, 10		
B-01001	Reformer	PM	6.29	23.77	10		
B-01001	Reformer	PM10	6.29	23.77	10		
B-01001	Reformer	PM2.5	5.53	20.92	10, 25, 27	25, 27	25
B-01001	Reformer	PM2.5 (7)	6.64	0.4	10		
B-14001	Auxiliary Boiler	NOx	14.25	30.57	3, 24, 25, 26	3, 24, 25, 26	3, 24, 25
B-14001	Auxiliary Boiler	NOx (6)	38.00	3.42	24	24	24
B-14001	Auxiliary Boiler	NH3	3.64	11.71	24, 25, 26	24, 25, 26	24, 25
B-14001	Auxiliary Boiler	CO	59.96	38.57	24, 25, 26	24, 25, 26	24, 25

Major NSR Summary Table

Permits Numbers: 107764 and PSDTX1340					Issuance Date: 08/14/2017		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.
B-14001	Auxiliary Boiler	VOC	5.12	16.479			
B-14001	Auxiliary Boiler	SO_2	0.53	1.71	7		
B-14001	Auxiliary Boiler	PM	5.00	14.44			
B-14001	Auxiliary Boiler	PM_{10}	4.75	14.44			
B-14001	Auxiliary Boiler	$PM_{2.5}$	3.95	12.71	25, 26	25, 26	25
S-10001	MeOH Flare	NOx	2.28	10.01	14	14	
S-10001	MeOH Flare	CO	15.39	67.57	14	14	
S-10001	MeOH Flare	VOC	0.84	3.68	5, 14	5, 14	5
S-10001	MeOH Flare	MeOH	0.42	1.83	5, 14	5, 14	5
S-10001	MeOH Flare	SO_2	0.043	0.19	7, 14	14	
S-10001 MSS	MeOH Flare MSS	NOx	425.11	19.70	14	14, 30	
S-10001 MSS	MeOH Flare MSS	CO	3644.98	300.31	14	14, 30	
S-10001 MSS	MeOH Flare MSS	VOC	158.59	1.12	5, 14	5, 14, 30	5
S-10001 MSS	MeOH Flare MSS	MeOH	151.04	0.85	5, 14	5, 14, 30	5

Major NSR Summary Table

Permits Numbers: 107764 and PSDTX1340					Issuance Date: 08/14/2017		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.
S-10001 MSS	MeOH Flare MSS	SO_2	12.55	0.6	7, 14	14, 30	
D-04001	MeOH Water Scrubber 1	VOC	7.24	1.65	5, 17, 25	5, 13, 17, 25	5, 25
D-04001	MeOH Water Scrubber 1	MeOH	7.24	1.65	5, 17, 25	5, 13, 17, 25	5, 25
FUG-MeOH	MeOH Fugitives (5)	VOC	9.73	7.44	5, 18, 22	5, 18, 22	5, 22
FUG-MeOH	MeOH Fugitives (5)	MeOH	9.63	6.94	5, 18, 22	5, 18, 22	5, 22
FUG-MeOH	MeOH Fugitives (5)	NH_3	0.01	0.01	23	23	
T-06001	MeOH Cooling Tower	VOC	7.54	10.41	5, 19	5, 19	5
T-06001	MeOH Cooling Tower	MeOH	7.54	10.41	5, 19	5, 19	5
T-06001	MeOH Cooling Tower	PM	37.70	82.57			
T-06001	MeOH Cooling Tower	PM_{10}	0.58	1.27			
T-06001	MeOH Cooling Tower	$PM_{2.5}$	0.01	0.03			

Major NSR Summary Table

Permits Numbers: 107764 and PSDTX1340					Issuance Date: 08/14/2017		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.
TEMP-MSS	Controlled Tank MSS Emissions	NOx	0.59	0.01	33, 34, 35, 36	30, 33, 34, 35, 36	
TEMP-MSS	Controlled Tank MSS Emissions	CO	1.17	0.02	33, 34, 35, 36	30, 33, 34, 35, 36	
TEMP-MSS	Controlled Tank MSS Emissions	VOC	6.74	0.12	33, 34, 35, 36	30, 33, 34, 35, 36	
TEMP-MSS	Controlled Tank MSS Emissions	MeOH	6.73	0.12	33, 34, 35, 36	30, 33, 34, 35, 36	
TEMP-MSS	Controlled Tank MSS Emissions	SO_2	<0.01	<0.01	33, 34, 35, 36	30, 33, 34, 35, 36	
TEMP-MSS	Controlled Tank MSS Emissions	PM	0.03	<0.01	33, 34, 35, 36	30, 33, 34, 35, 36	
TEMP-MSS	Controlled Tank MSS Emissions	PM_{10}	0.03	<0.01	33, 34, 35, 36	30, 33, 34, 35, 36	
TEMP-MSS	Controlled Tank MSS Emissions	$PM_{2.5}$	0.03	<0.01	33, 34, 35, 36	30, 33, 34, 35, 36	
FUG-MSS	Atmosphere MSS Emissions	VOC	29.00	0.09	32, 33, 34, 35	30, 31, 32, 33, 34, 35	
FUG-MSS	Atmosphere MSS Emissions	MeOH	29.00	0.09	32, 33, 34, 35	30, 31, 32, 33, 34, 35	

(1) Emission point identification – either specific equipment designation or emission point number from plot plan.
(2) Specific point source name. For fugitive sources, use area name or fugitive source name.
(3) NO_x – total oxiders of nitrogen
PM – total particulate matter, suspended in the atmosphere, including PM_{10} and $PM_{2.5}$
PM_{10} – particulate matter equal to or less than 10 microns in diameter, including $PM_{2.5}$
$PM_{2.5}$ – particulate matter equal to or less than 2.5 microns in diameter
CO – carbon monoxide
H_2SO_4 – sulfuric acid
(4) Compliance with annual emission limits (tons per year) is based on a 12-month rolling period.
(5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.

Texas Commission on Environmental Quality

Title V Existing

3963

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	METHANOL PLANT
Does the site have a physical address?	Yes
Physical Address	
Number and Street	2366 SULFUR PLANT ROAD
City	BEAUMONT
State	TX
ZIP	77705
County	JEFFERSON
Latitude (N) (##.######)	30.012222
Longitude (W) (-###.######)	94.036388
Primary SIC Code	2869
Secondary SIC Code	
Primary NAICS Code	325199
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN106586795
What is the name of the Regulated Entity (RE)?	BEAUMONT GAS TO GASOLINE PLANT
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	2366 SULPHUR PLANT RD
City	BEAUMONT
State	TX
ZIP	77705
County	JEFFERSON
Latitude (N) (##.######)	30.03143
Longitude (W) (-###.######)	-94.05388
Facility NAICS Code	
What is the primary business of this entity?	CHEMICAL MANUFACTURING

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN604256412
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Natgasoline LLC
Texas SOS Filing Number	801689918
Federal Tax ID	680682889
State Franchise Tax ID	32049571162
State Sales Tax ID	
Local Tax ID	
DUNS Number	79934278
Number of Employees	101-250
Independently Owned and Operated?	No

Responsible Official Contact

Person TCEQ should contact for questions about this application:	
Organization Name	NATGASOLINE LLC
Prefix	MR
First	LARRY
Middle	
Last	RICHARD
Suffix	
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)	2366 SULPHUR PLANT RD
Routing (such as Mail Code, Dept., or Attn:)	
City	BEAUMONT
State	TX
ZIP	77705

Phone (###-###-####)	4093444900
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	larry.richard@natgasoline.com

Technical Contact

Person TCEQ should contact for questions about this application:	
Select existing TC contact or enter a new contact.	New Contact
Organization Name	Compliance Solutions Group LLC
Prefix	MR
First	Philip
Middle	
Last	Curwick
Suffix	
Credentials	
Title	Project Engineer
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	16851 JEFFERSON HWY STE 6D
Routing (such as Mail Code, Dept., or Attn:)	
City	BATON ROUGE
State	LA
ZIP	70817
Phone (###-###-####)	2257540405
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	pcurwick@compliance-sg.com

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	30 Deg 0 Min 44 Sec

3) Permit Longitude Coordinate:	94 Deg 2 Min 11 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) 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)

[File Properties]

File Name	OP_1_1 Form OP-1(2.21.24).pdf
Hash	5558F3909F97CC7BC1A9B86E509F049EBF73021C56E1FB69759095230867D460
MIME-Type	application/pdf

Attach OP-2 (Application for Permit Revision/Renewal)

[File Properties]

File Name	OP_2_2 Form OP-2 (2.21.24).pdf
Hash	0A96473CE525CC9D6A5D52A86D6006152C4E1B56FB1B2C8E37D6B4A521C19039
MIME-Type	application/pdf

Attach OP-ACPS (Application Compliance Plan and Schedule)

[File Properties]

File Name	OP_ACPS_3 Form OP-ACPS (2.21.2024).pdf
Hash	70A4D639A1FACF2A2B32773FD001AB60E0FDCA5AD795908C9A25ED2403CAA573
MIME-Type	application/pdf

Attach OP-REQ1 (Application Area-Wide Applicability Determinations and General Information)

[File Properties]

File Name	OP_REQ1_17 Form OP-REQ1

	(2.20.24).pdf
Hash	828CA00B4DF8A6D9FA84488FAC2D448574DB13CADCFE2F7EDC1A65D2E99D8CBA
MIME-Type	application/pdf

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

[File Properties]	
File Name	OP_REQ2_18 Form OP-REQ2 (2.20.24).pdf
Hash	124AA532054EF6EE7240C00728EF9F085CB17248090D7D044BC713E5309938F0
MIME-Type	application/pdf

Attach OP-REQ3 (Applicable Requirements Summary)

[File Properties]	
File Name	OP_REQ3_19 Form OP-REQ3 (2.21.24).pdf
Hash	712599E2CB6CFC41DD70019791BB877E98F7BFB592E5DDBECDADD838FF16D8F9
MIME-Type	application/pdf

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

[File Properties]	
File Name	OP_PBRSUP_21 Form OP-PBRSUP (2.20.24).pdf
Hash	4169CB317FA7B851422B8B19E4437BD76AC91FF52939931BFAB8C02DED9017AC
MIME-Type	application/pdf

Attach OP-SUMR (Individual Unit Summary for Revisions)

[File Properties]	
File Name	OP_SUMR_4 Form OP-SUMR (2.21.24).pdf
Hash	C8311FCD591D1D3040063C55593DB3CA06E690C7DF5DD16F09DB3072C865ED72
MIME-Type	application/pdf

Attach OP-MON (Monitoring Requirements)

[File Properties]	
File Name	OP_MON_20 Form OP-MON

	(1.17.2024).pdf
Hash	0170182F67CEEA95FA519F6C2857F2E80E063B86D5C5A04AF0CD545C132DB86D
MIME-Type	application/pdf

Attach OP-UA (Unit Attribute) Forms

[File Properties]	
File Name	UA Forms.pdf
Hash	F2C1AA14B0BD4E090EE0B047CEF34C3C703497EFDA41CDECA25DE554BEB2EB3D
MIME-Type	application/pdf

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	5 Form Major NSR Summary Table (2.21.24).pdf
Hash	AA20DAD07BD527A5F7E0BD0F53A56A180F01336EC8366F0F1BA1942596091D1A
MIME-Type	application/pdf

An additional space to attach any other necessary information needed to complete the permit.

[File Properties]	
File Name	Federal Operating Permit Application (2.21.2024).pdf
Hash	7F039CC21D4438F997C22FA03F12004F9A62A06C1496C70E40AFA6E71D587E17
MIME-Type	application/pdf

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 Responsible Official 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 Larry Richard, the owner of the STEERS account ER103291.
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 3963.
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: Larry Richard OWNER OPERATOR

Account Number:	ER103291
Signature IP Address:	97.77.44.5
Signature Date:	2024-02-21
Signature Hash:	BD33A3CFC094A6D7C4DB25EF6E25FF63DF576CED87EDB1F5B4F7CC9FE88EA8CB
Form Hash Code at time of Signature:	732F6DDD4EAEA56320C95BFC38DFC431AFDE4AC6014776F2FECB6A8E7D6CCC93

Submission

Reference Number:	The application reference number is 612029
Submitted by:	The application was submitted by ER103291/Larry Richard
Submitted Timestamp:	The application was submitted on 2024-02-21 at 16:21:24 CST
Submitted From:	The application was submitted from IP address 97.77.44.5
Confirmation Number:	The confirmation number is 522315
Steers Version:	The STEERS version is 6.73
Permit Number:	The permit number is 3963

Additional Information

Application Creator: This account was created by Charles M Munley JR