

AUG 28 2025

RECEIVED


**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.

<b>I. Identifying Information</b>	
RN: <b>RN110300126</b>	
CN: <b>CN605483213</b>	
Account No.: <b>BLA059G</b>	
Permit No.: <b>O2215</b>	
Project No.: <b>36422</b>	
Area Name: <b>Adhesive Polymers Plant</b>	
Company Name: <b>SK Primacor Americas LLC</b>	
<b>II. Certification Type</b> <i>(Please mark appropriate box)</i>	
<input checked="" type="checkbox"/> Responsible Official Representative	<input type="checkbox"/> Duly Authorized Representative
<b>III. Submittal Type</b> <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>	
<input type="checkbox"/> SOP/TOP Initial Permit Application	<input type="checkbox"/> Permit Revision, Renewal, or Reopening
<input type="checkbox"/> GOP Initial Permit Application	<input checked="" type="checkbox"/> Update to Permit Application
<input type="checkbox"/> Other: _____	

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

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

<b>IV. Certification of Truth</b>			
<b>This certification does not extend to information which is designated by TCEQ as information for reference only.</b>			
I, <u>Marzouk Marzouk</u> certify that I am the <u>RO</u> <div style="display: flex; justify-content: space-between; font-size: small; margin-top: 5px;"><span>(Certifier Name printed or typed)</span><span>(RO or DAR)</span></div>			
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete: <i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>			
Time Period: From <u>02/14/2024</u> to <u>08/18/2025</u> <div style="display: flex; justify-content: space-between; font-size: small; margin-top: 5px;"><span>(Start Date)</span><span>(End Date)</span></div>			
Specific Dates: _____ <div style="display: flex; justify-content: space-between; font-size: small; margin-top: 5px;"><span>(Date 1)</span><span>(Date 2)</span><span>(Date 3)</span><span>(Date 4)</span></div>			
_____ <div style="display: flex; justify-content: space-between; font-size: small; margin-top: 5px;"><span>(Date 5)</span><span>(Date 6)</span></div>			
Signature: <u></u> Signature Date: <u>8-25-25</u>			
Title: <u>Plant Director</u>			

**From:** Shaw, Garrett <Garrett.Shaw@aecom.com>  
**Sent:** Monday, August 18, 2025 1:32 PM  
**To:** Jennifer Tenney  
**Cc:** MartinezJacob(Jacob Martinez)/Operations; Garcia, Annette; MarzoukMarzouk(Marzouk Marzouk)/Reliability & Maintenance; Baker, Brandon (B); Sparks, Ellen; Shaw, Garrett  
**Subject:** RE: RFI/Project Certification -- FOP O2215/Project 36422, SK Primacor Americas/Adhesives Polymer Plant  
**Attachments:** OP-PBRSUP.docx; OP-SUMR.docx

Hello Jen,

Attached you will find an updated OP-SUMR and OP-PBRSUP. Unit B77APPVAV has been updated to reflect its correct permit authorization under 106.261 [179825].

Thank you,

Garrett

**Garrett B. Shaw**

Air Quality Engineer, Air Quality Permitting and Compliance  
[garrett.shaw@aecom.com](mailto:garrett.shaw@aecom.com)  
512-820-6522

**AECOM**

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**From:** Sparks, Ellen <[Ellen.Sparks@aecom.com](mailto:Ellen.Sparks@aecom.com)>  
**Sent:** Friday, August 15, 2025 3:14 PM  
**To:** Jennifer Tenney <[Jennifer.Tenney@tceq.texas.gov](mailto:Jennifer.Tenney@tceq.texas.gov)>; Shaw, Garrett <[Garrett.Shaw@aecom.com](mailto:Garrett.Shaw@aecom.com)>  
**Cc:** MartinezJacob(Jacob Martinez)/Operations <[j.martinez@sk.com](mailto:j.martinez@sk.com)>; Garcia, Annette <[annette.garcia@aecom.com](mailto:annette.garcia@aecom.com)>; MarzoukMarzouk(Marzouk Marzouk)/Reliability & Maintenance <[m.marzouk@sk.com](mailto:m.marzouk@sk.com)>; Baker, Brandon (B) <[bbaker4@dow.com](mailto:bbaker4@dow.com)>  
**Subject:** RE: RFI/Project Certification -- FOP O2215/Project 36422, SK Primacor Americas/Adhesives Polymer Plant

No worries!! Thanks for clarifying!

**Ellen A. Sparks**

Air Quality Specialist, Air Quality & Compliance Practice  
D +1-281-675-3523  
[ellen.sparks@aecom.com](mailto:ellen.sparks@aecom.com)

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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.
08/18/2025	O2215	RN110300126

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
		B77APCF401	OP-UA15	KNOCKOUT VENT		106.261/11/01/2003[105203]	
		B77APCF402	OP-UA15	KNOCKOUT VENT		106.261/11/01/2003[105203]	
		B77APCT1	OP-UA13	CT-1		8567 106.371/09/04/2000	
		B77APD108	OP-UA15	APP MATERIALS HANDLING VENT 108		8567	
		B77APD109	OP-UA15	APP MATERIALS HANDLING VENT 109		8567	
		B77APD132	OP-REQ2	PTZ-EA TOTE		106.261/11/01/2003[148427] 106.262/11/01/2003[148427]	
		B77APFU1	OP-UA1 OP-UA12	B-77 PROCESS FUGITIVES		8567 106.261/11/01/2003[105203, 106311, 108295, 148427, 179825] 106.262/11/01/2003[108295, 148427] 106.473/09/04/2000 106.263/11/01/2003	



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Federal Operating Permit Program  
Individual Unit Summary for Revisions  
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Table 1**

Date	Permit No.	Regulated Entity No.
08/18/2025	O2215	RN110300126

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
		B77APLR1	OP-UA4	APP LOADING RACK		8567	
		B77APLR133	OP-UA4	KEROSENE LOADING		8567 106.473/09/04/2000	
		B77APLR750	OP-UA4	D-50 WASTE CATALYST LOADING		8567	
		B77APPT10	OP-UA15	CATALYST MIX TANK		8567	
		B77APPT10A	OP-UA15	CATALYST MIX TANK		8567	
		B77APPT11	OP-UA15	CATALYST MIX TANK		8567	
		B77APPT11A	OP-UA15	CATALYST MIX TANK		8567	
		B77APPT12	OP-UA15	CATALYST MIX TANK		8567	
		B77APPT12A	OP-UA15	CATALYST MIX TANK		8567	
		B77APPVAV	OP-UA15	HRVOC ANALYZERS		106.261/11/01/2003 [179825] <del>106.262/11/01/2003</del> [81988]	

**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.
08/18/2025	O2215	RN110300126

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
		B77APRX1	OP-REQ2	APP PROCESS		8567	
		B77APSC01	OP-REQ2	DEGREASER		106.454/07/08/1998	
		B77APSC07	OP-UA16 OP-UA57	B7700 MAINTENANCE & SOLVENT CLEANING		8567	
		B77APSP101	OP-UA15	APP SPIN DRYER VENT 101		8567	
		B77APSPS1	OP-UA14	AP OIL/WATER SEPARATOR SUMP 1		8567	
		B77APSPS2	OP-UA14	AP OIL/WATER SEPARATOR SUMP 2		8567	
		B77APSPS3	OP-UA14	AP OIL/WATER SEPARATOR SUMP 3		8567	
		B77APST1	OP-UA3	KEROSENE STORAGE TANK T-1		8567	
		B77APST10	OP-UA3	AP STORAGE TANK T-10		8567	
		B77APST11	OP-UA3	AP STORAGE TANK T-11		8567	

**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.
08/18/2025	O2215	RN110300126

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
		B77APST12	OP-UA3	AP STORAGE TANK T-12		8567	
		B77APST133	OP-UA3	KEROSENE PROCESS TANK		8567	
		B77APST750	OP-REQ2	APP CATALYST AND WASTE OIL DUMPSTER		8567	
		B77APST8	OP-UA3	AP STORAGE TANK T-8		8567	
		B77APSTT14	OP-UA3	AP STORAGE TANK T-14		8567	
		B77APSTT15	OP-UA3	AP STORAGE TANK T-15		8567	
		B77APV101	OP-UA15	APP SILO V-101, CHECK HOPPER		8567	
		B77APV102	OP-UA15	APP SILO V-102, CHECK HOPPER		8567	
		B77APWW	OP-REQ2	APP POLYETHYLENE WASTE WATER		8567	
		B77SB101	OP-UA15	APP SILO SB-101, MAKE HOPPER		8567	

**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.
08/18/2025	O2215	RN110300126

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
		B77SB102	OP-UA15	APP SILO SB-102, MAKE HOPPER		8567	
		B77SB103	OP-UA15	APP SILO SB-103, MAKE HOPPER		8567	
		B77SB104	OP-UA15	APP SILO SB-104, MAKE HOPPER		8567	
		B77SB105	OP-UA15	APP SILO SB-105, MAKE HOPPER		8567	
		B77SB106	OP-UA15	APP SILO SB-106, MAKE HOPPER		8567	
		B77SB107	OP-UA15	APP SILO SB-107, MAKE HOPPER		8567	
		B77SPS102	OP-UA14	AP SEPARATOR		8567	
		B77SPS103	OP-UA15	AP SEPARATOR		8567	
		B78APF1	OP-UA7 OP-UA15	APP FLARE		8567 106.261/11/01/2003[142435] 106.263/11/01/2003	
		B78APFU1	OP-UA1 OP-UA12	B-78 PROCESS FUGITIVES		8567 106.124/09/04/2000	

**Texas Commission on Environmental Quality  
Federal Operating Permit Program  
Individual Unit Summary for Revisions  
Form OP-SUMR  
Table 1**

Date	Permit No.	Regulated Entity No.
08/18/2025	O2215	RN110300126

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
		B78APKO2A	OP-UA15	APP FLARE KNOCK OUT DRUM D-22		8567	
		B78APPTT1	OP-UA3	ACRYLIC ACID ISOCONTAINER		106.124/09/04/2000	
		B78APST5	OP-UA3	AP STORAGE TANK T-5		8567 106.261/11/01/2003[108295] 106.262/11/01/2003[108295]	
		PROAPP	OP-UA57 OP-UA60	APP PROCESS UNIT		8567	

**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
August 18, 2025	O2215	RN110300126

Unit ID No.	Registration No.	PBR No.	Registration Date
B77APFU1	105203 106311	106.261	11/21/2012 01/15/2013
B77APFU1	108295 148427	106.261 106.262	05/09/2013 10/18/2017
B77APFU1	179825	106.261	04/15/2025
B77APCF401	105203	106.261	11/21/2012
B77APCF402	105203	106.261	11/21/2012
B77APD132	148427	106.261 106.262	10/18/2017
B77APPVAV	<del>81988</del> <b>179825</b>	106.261 <del>106.262</del>	<del>06/12/2007</del> <b>04/15/2025</b>
B78APF1	142435	106.261	10/03/2016
B78APST5	108295	106.261 106.262	05/09/2013



**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
August 18, 2025	O2215	RN110300126

Unit ID No.	PBR No.	Version No./Date
B77APCT1	106.371	09/04/2000
B78APF1 B77APFU1	106.263	11/01/2001
B77APFU1	106.473	09/04/2000
B77APLR133	106.473	09/04/2000
B77APSC01	106.454	11/01/2000
B78APFU1	106.124	09/04/2000
B78APPTT1	106.124	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
August 18, 2025	O2215	RN110300126

PBR No.	Version No./Date
N/A	N/A

**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
August 18, 2025	O2215	RN110300126

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B77APFU1	106.261 106.262	105203 106311	Maintain PBR documentation
B77APFU1	106.261 106.262	108295 148427	Maintain PBR documentation
B77APFU1	106.261	179825	Maintain PBR documentation
B77APCF401	106.261	105203	Maintain PBR documentation
B77APCF402	106.261	105203	Maintain PBR documentation
B77APD132	106.261 106.262	148427	Maintain PBR documentation
B77APPVAV	106.261 <del>106.262</del>	11/01/2003 <del>11/01/2003</del>	Maintain PBR documentation
B78APF1	106.261	142435	Maintain PBR documentation
B78APST5	106.261 106.262	11/01/2003 11/01/2003	Maintain PBR documentation

**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
August 18, 2025	O2215	RN110300126

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B77APCT1	106.371	09/04/2000	Circulation rate is measured, and TDS samples are taken
B78APF1 B77APFU1	106.263	11/01/2001	Track emissions on a 12-month rolling basis
B77APFU1	106.473	09/04/2000	Maintain records of type of liquid loaded/unloaded
B77APLR133	106.473	09/04/2000	Maintain records of type of liquid loaded/unloaded
B77APSC01	106.454	11/01/2000	Maintain records of the solvent TVP and drain area of the cold solvent cleaner
B78APFU1	106.124	09/04/2000	Maintain PBR documentation and track emissions
B78APPTT1	106.124	09/04/2000	Maintain PBR documentation and track emissions

---

**From:** Jennifer Tenney <[Jennifer.Tenney@tceq.texas.gov](mailto:Jennifer.Tenney@tceq.texas.gov)>

**Sent:** Friday, August 15, 2025 1:23 PM

**To:** Shaw, Garrett <[Garrett.Shaw@aecom.com](mailto:Garrett.Shaw@aecom.com)>

**Cc:** MartinezJacob(Jacob Martinez)/Operations <[j.martinez@sk.com](mailto:j.martinez@sk.com)>; Sparks, Ellen

<[Ellen.Sparks@aecom.com](mailto:Ellen.Sparks@aecom.com)>; Garcia, Annette <[annette.garcia@aecom.com](mailto:annette.garcia@aecom.com)>;

MarzoukMarzouk(Marzouk Marzouk)/Reliability & Maintenance <[m.marzouk@sk.com](mailto:m.marzouk@sk.com)>; Baker, Brandon (B) <[bbaker4@dow.com](mailto:bbaker4@dow.com)>

**Subject:** RFI/Project Certification -- FOP O2215/Project 36422, SK Primacor Americas/Adhesives Polymer Plant

Good Afternoon,

The team leader has reviewed the application and noted the following issues. Please respond by **Tuesday August 18, 2025**.

- OP-SUMR for Unit ID No. B77APPVAV has the preconstruction authorization as PBR Registration No. 81988. Since per your email dated 03/03/2025 that PBR registration number is not associated with this project anymore, please submit an updated OP-SUMR with the correct PBR registration number.
- OP-PBRSUP will need to have the registration number updated for Unit ID No. B77APPVAV as it currently has PBR Registration No. 81988. Please be sure to submit all four tables as a set and the dates on all tables are updated to the same date.

You had requested that a final OP-CRO1 be completed when all the revisions are complete. As explained in the last email, we will require the OP-CRO1 have the date period from the application submittal 02/14/2024 through the submittal of the requested OP-SUMR and OP-PBRSUP. 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 wet signature OP-CRO1.

Thanks,  
Jen

Jennifer Tenney  
Environmental Permit Specialist II  
TCEQ – APD – OP Section (Title V)  
(512) 239-1830



How are we doing? Fill out our online customer satisfaction survey at [www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

**From:** Shaw, Garrett <Garrett.Shaw@aecom.com>  
**Sent:** Thursday, July 24, 2025 12:58 PM  
**To:** Jennifer Tenney  
**Cc:** MartinezJacob(Jacob Martinez)/Operations; Sparks, Ellen; Garcia, Annette; MarzoukMarzouk(Marzouk Marzouk)/Reliability & Maintenance; Baker, Brandon (B); Shaw, Garrett  
**Subject:** RE: RFI/Project Certification -- FOP O2215/Project 36422, SK Primacor Americas/Adhesives Polymer Plant  
**Attachments:** OP-REQ1 Page 86.docx; OP-1.docx; OP-PBRSUP.docx  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hello Jennifer,

Attached are updated forms to address your questions and concerns. Below you will find comments to your original email in **Blue**.

Thanks,

Garrett

**Garrett B. Shaw**

Air Quality Engineer, Air Quality Permitting and Compliance  
[garrett.shaw@aecom.com](mailto:garrett.shaw@aecom.com)

**AECOM**

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---

**From:** Jennifer Tenney <[Jennifer.Tenney@tceq.texas.gov](mailto:Jennifer.Tenney@tceq.texas.gov)>  
**Sent:** Monday, July 21, 2025 2:01 PM  
**To:** MartinezJacob(Jacob Martinez)/Operations <[j.martinez@sk.com](mailto:j.martinez@sk.com)>; Sparks, Ellen <[Ellen.Sparks@aecom.com](mailto:Ellen.Sparks@aecom.com)>  
**Cc:** Shaw, Garrett <[Garrett.Shaw@aecom.com](mailto:Garrett.Shaw@aecom.com)>; Garcia, Annette <[annette.garcia@aecom.com](mailto:annette.garcia@aecom.com)>; MarzoukMarzouk(Marzouk Marzouk)/Reliability & Maintenance <[m.marzouk@sk.com](mailto:m.marzouk@sk.com)>; Baker, Brandon (B) <[bbaker4@dow.com](mailto:bbaker4@dow.com)>  
**Subject:** FW: RFI/Project Certification -- FOP O2215/Project 36422, SK Primacor Americas/Adhesives Polymer Plant

Good Afternoon,

Below are a couple more issues I need addressed. Please respond to this email by **Friday July 26, 2025**.

Please review responses to Section XII.B on Form OP-REQ1. There are not any Standard Permits listed in the application.



**Attached is an updated OP-REQ1 page 86 and 87. The responses to Section XII. B have been updated to indicate that there are not any Standard Permits listed in the application.**

OP-1 – Site Name/Area Name – on OP-1 the site name response is Adhesive Polymer Plant and the response on area name it is Adhesive Polymer Plant (see difference of "s" moved from one word to other). Can you please update the OP-1 to have consistent naming.

**I have updated the Site Name to match properly to the permitted site name, “SK Primacor Americas”.**

**“Adhesive Polymers Plant” which is found in the Area Name category does match the current permit correctly.**

B77APSC01 - 106.454 Effective Date – there are discrepancies between these forms for the PBR effective date. Please confirm which date is correct and submit all forms that require a corrected date, all dates should match.

- OP-SUMR – 07/08/1998
- OP-PBR SUP Tables B and D – 11/01/2000 (this is not a valid date for this PBR Number (11/01/2001 is a valid date)
- OP-REQ1 page 88 – 07/08/1998

**I have updated the PBR SUP to match the date found in the OP-REQ1 and OP-SUMR (07/08/1998).**

You had requested that a final OP-CRO1 be completed when all the revisions are complete. Based on my records, the first submittal after the application was on 04/26/2024. Therefore, you can use the Time Period option on the form with a date range from 04/26/2024 thru the final submittal date of all the updates. 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 wet signature OP-CRO1.

Please let me know if you have any questions.

Thanks  
Jen

Jennifer Tenney  
Environmental Permit Specialist II  
TCEQ – APD – OP Section (Title V)  
(512) 239-1830



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---

**From:** MartinezJacob(Jacob Martinez)/Operations <[j.martinez@sk.com](mailto:j.martinez@sk.com)>  
**Sent:** Friday, July 11, 2025 2:19 PM  
**To:** Jennifer Tenney <[Jennifer.Tenney@tceq.texas.gov](mailto:Jennifer.Tenney@tceq.texas.gov)>; Sparks, Ellen <[Ellen.Sparks@aecom.com](mailto:Ellen.Sparks@aecom.com)>  
**Cc:** Baker, Brandon (B) <[bbaker4@dow.com](mailto:bbaker4@dow.com)>; Shaw, Garrett <[garrett.shaw@aecom.com](mailto:garrett.shaw@aecom.com)>; Garcia, Annette <[annette.garcia@aecom.com](mailto:annette.garcia@aecom.com)>; MarzoukMarzouk(Marzouk Marzouk)/Reliability & Maintenance <[m.marzouk@sk.com](mailto:m.marzouk@sk.com)>  
**Subject:** RE: Project Certification -- FOP O2215/Project 36422, SK Primacor Americas/Adhesives Polymer Plant

Jennifer,

There should be no difference between these files and the ones submitted on April 30. I am glad to hear that these have already been submitted.

**Best Regards,**  
**Jacob Martinez**  
**Process Engineer**



2301 N. Brazosport Blvd., B-7701,  
Freeport, TX 77541  
Mobile: +1-832-851-9988

---

**From:** Jennifer Tenney <[Jennifer.Tenney@tceq.texas.gov](mailto:Jennifer.Tenney@tceq.texas.gov)>  
**Sent:** Friday, July 11, 2025 2:09 PM  
**To:** Jacob Martinez/Operations/SKGC <[j.martinez@skgeocentric.com](mailto:j.martinez@skgeocentric.com)>; Sparks, Ellen <[Ellen.Sparks@aecom.com](mailto:Ellen.Sparks@aecom.com)>  
**Cc:** Baker, Brandon (B) <[bbaker4@dow.com](mailto:bbaker4@dow.com)>; Shaw, Garrett <[garrett.shaw@aecom.com](mailto:garrett.shaw@aecom.com)>; Garcia, Annette <[annette.garcia@aecom.com](mailto:annette.garcia@aecom.com)>; Marzouk Marzouk/Reliability & Maintenance/SKGC <[m.marzouk@skgeocentric.com](mailto:m.marzouk@skgeocentric.com)>  
**Subject:** RE: Project Certification -- FOP O2215/Project 36422, SK Primacor Americas/Adhesives Polymer Plant

[외부메일] 첨부파일 및 링크 열람에 주의하시기 바랍니다.

[CAUTION] This email originated from external sender(s). Please BE CAUTIOUS before clicking links or opening attachments.

Jacob,

I do have these files - are any of files different than the one submitted on April 30? I should be able to get back on processing this application soon, apologies for the delay.

Thanks  
Jen

---

**From:** MartinezJacob(Jacob Martinez)/Operations <[j.martinez@sk.com](mailto:j.martinez@sk.com)>  
**Sent:** Thursday, July 10, 2025 11:10 AM  
**To:** Sparks, Ellen <[Ellen.Sparks@aecom.com](mailto:Ellen.Sparks@aecom.com)>; Jennifer Tenney <[Jennifer.Tenney@tceq.texas.gov](mailto:Jennifer.Tenney@tceq.texas.gov)>  
**Cc:** Baker, Brandon (B) <[bbaker4@dow.com](mailto:bbaker4@dow.com)>; Shaw, Garrett <[garrett.shaw@aecom.com](mailto:garrett.shaw@aecom.com)>; Garcia, Annette <[annette.garcia@aecom.com](mailto:annette.garcia@aecom.com)>; MarzoukMarzouk(Marzouk Marzouk)/Reliability & Maintenance <[m.marzouk@sk.com](mailto:m.marzouk@sk.com)>  
**Subject:** RE: Project Certification -- FOP O2215/Project 36422, SK Primacor Americas/Adhesives Polymer Plant

Hi Jennifer,

I am submitting the documents you requested below. I am unsure if these documents have been submitted already but just wanted to send them again just in case.

Please let me know if you have any questions or need anything else.

**Best Regards,**  
**Jacob Martinez**  
**Process Engineer**



2301 N. Brazosport Blvd., B-7701,  
Freeport, TX 77541  
Mobile: +1-832-851-9988

---

**From:** Jennifer Tenney <[Jennifer.Tenney@tceq.texas.gov](mailto:Jennifer.Tenney@tceq.texas.gov)>  
**Sent:** Monday, April 14, 2025 10:29 AM  
**To:** Sparks, Ellen <[Ellen.Sparks@aecom.com](mailto:Ellen.Sparks@aecom.com)>; Shaw, Garrett <[Garrett.Shaw@aecom.com](mailto:Garrett.Shaw@aecom.com)>; Garcia, Annette <[annette.garcia@aecom.com](mailto:annette.garcia@aecom.com)>  
**Cc:** [bbaker4@dow.com](mailto:bbaker4@dow.com); Jacob Martinez/Operations/SKGC <[j.martinez@skgeocentric.com](mailto:j.martinez@skgeocentric.com)>; Marzouk Marzouk/Reliability & Maintenance/SKGC <[m.marzouk@skgeocentric.com](mailto:m.marzouk@skgeocentric.com)>  
**Subject:** FW: Project Certification -- FOP O2215/Project 36422, SK Primacor Americas/Adhesives Polymer Plant

Good Morning,

The PBR will need to be issued before we can update our information. It looks like it was submitted on April 9, 2025. The following is what we will need once the PBR is issued.

Form OP-CRO1 will need to be submitted by the RO or DAR using the Time Period option on the form with a date range from 04/26/2024 thru the final submittal date when the updated forms are submitted.

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Form OP-1 page 3 will need to be submitted with the new technical contact information.

Form OP-PBR SUP – please submit all four tables (as a set) with the updated form date on each page.

Form OP-SUMR will need to be updated for any units under the new PBR number.

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.

Thanks  
Jen

Jennifer Tenney  
Environmental Permit Specialist I  
TCEQ – APD – OP Section (Title V)  
(512) 239-1830



How are we doing? Fill out our online customer satisfaction survey at [www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

---

**From:** Sparks, Ellen <[Ellen.Sparks@aecom.com](mailto:Ellen.Sparks@aecom.com)>

**Sent:** Friday, April 11, 2025 12:02 PM

**To:** Jennifer Tenney <[Jennifer.Tenney@tceq.texas.gov](mailto:Jennifer.Tenney@tceq.texas.gov)>; Shaw, Garrett <[Garrett.Shaw@aecom.com](mailto:Garrett.Shaw@aecom.com)>; Garcia, Annette <[annette.garcia@aecom.com](mailto:annette.garcia@aecom.com)>

**Cc:** Baker, Brandon (B) <[bbaker4@dow.com](mailto:bbaker4@dow.com)>; [j.martinez@sk.com](mailto:j.martinez@sk.com); MarzoukMarzouk(Marzouk Marzouk)/Reliability & Maintenance <[m.marzouk@sk.com](mailto:m.marzouk@sk.com)>

**Subject:** RE: Project Certification -- FOP O2215/Project 36422, SK Primacor Americas/Adhesives Polymer Plant

Hi Jennifer,

The PBR has been submitted in STEERs (Permit No. 179825 / Project No. 391462).

Additionally there's been some changes to personnel at SK since the Title V was submitted. Chaney Phillips and Sherrie Solis are no longer with SK.

The new RO will be Marzouk and technical contact for the site is Jacob Martinez. I assume we'll need to fill out a new OP-CRO1 and possibly OP-CRO2 or OP-DEL?

Thanks!

**Ellen A. Sparks**

Air Quality Specialist, Air Quality & Compliance Practice  
D +1-281-675-3523  
[ellen.sparks@aecom.com](mailto:ellen.sparks@aecom.com)

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T +1-281-646-2400  
[aecom.com](http://aecom.com)



---

**From:** Jennifer Tenney <[Jennifer.Tenney@tceq.texas.gov](mailto:Jennifer.Tenney@tceq.texas.gov)>

**Sent:** Monday, March 17, 2025 5:27 PM

**To:** Sparks, Ellen <[Ellen.Sparks@aecom.com](mailto:Ellen.Sparks@aecom.com)>; Shaw, Garrett <[Garrett.Shaw@aecom.com](mailto:Garrett.Shaw@aecom.com)>; Garcia, Annette <[annette.garcia@aecom.com](mailto:annette.garcia@aecom.com)>

**Cc:** [ssolis5@dow.com](mailto:ssolis5@dow.com); [j.martinez@sk.com](mailto:j.martinez@sk.com)

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Good Afternoon

Is there any update on the PBR authorization split between SK and DOW?

I wanted to let you know of the certifications that will be needed to be completed.

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You had requested that a final OP-CRO1 be completed when all the revisions are complete. Based on my records, the first submittal after the application was on 04/26/2024. Therefore, you can use

**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.

<b>I. Company Identifying Information</b>
A. Company Name: SK Primacor Americas LLC
B. Customer Reference Number (CN): CN605483213
C. Submittal Date (mm/dd/yyyy): February 14, 2024
<b>II. Site Information</b>
A. Site Name: <del>Adhesives Polymer Plant</del> <b>SK Primacor Americas</b>
B. Regulated Entity Reference Number (RN): RN110300126
C. Indicate affected state(s) required to review permit application: <i>(Check the appropriate box[es].)</i>
<input type="checkbox"/> AR <input type="checkbox"/> CO <input type="checkbox"/> KS <input type="checkbox"/> LA <input type="checkbox"/> NM <input type="checkbox"/> OK <input checked="" type="checkbox"/> N/A
D. Indicate all pollutants for which the site is a major source based on the site's potential to emit: <i>(Check the appropriate box[es].)</i>
<input checked="" type="checkbox"/> VOC <input checked="" type="checkbox"/> NO <sub>x</sub> <input checked="" type="checkbox"/> SO <sub>2</sub> <input checked="" type="checkbox"/> PM <sub>10</sub> <input checked="" type="checkbox"/> CO <input type="checkbox"/> Pb <input checked="" type="checkbox"/> HAPS
Other:
E. Is the site a non-major source subject to the Federal Operating Permit Program? <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
F. Is the site within a local program area jurisdiction? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>
G. Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
H. Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:
<b>III. Permit Type</b>
A. Type of Permit Requested: <i>(Select only one response )</i>
<input checked="" type="checkbox"/> Site Operating Permit (SOP) <input type="checkbox"/> Temporary Operating Permit (TOP) <input type="checkbox"/> General Operating Permit (GOP)



# Application Area-Wide Applicability Determinations and General Information

## Form OP-REQ1 (Page 86)

### Federal Operating Permit Program

### Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
July 24, 2025	O2215	RN110300126

For SOP applications, answer ALL questions unless otherwise directed.

◆ For GOP applications, answer ONLY these questions unless otherwise directed.

XII. New Source Review (NSR) Authorizations (continued)		
B. Air Quality Standard Permits		
◆ 1.	The application area includes at least one Air Quality Standard Permit NSR authorization. <i>If the response to XII.B.1 is "No," go to Section XII.C. If the response to XII.B.1 is "Yes," be sure to include the standard permit's registration numbers in Section XII.H and answer XII.B.2 - B.16 as appropriate.</i>	<input checked="" type="checkbox"/> <del>Yes</del> <input type="checkbox"/> <del>No</del> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆ 2.	The application area includes at least one "State Pollution Control Project" Air Quality Standard Permit NSR authorization under 30 TAC § 116.617.	<input checked="" type="checkbox"/> <del>Yes</del> <input type="checkbox"/> <del>No</del> <input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 3.	The application area includes at least one non-rule Air Quality Standard Permit for Pollution Control Projects NSR authorization.	<input checked="" type="checkbox"/> <del>Yes</del> <input type="checkbox"/> <del>No</del> <input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 4.	The application area includes at least one "Installation and/or Modification of Oil and Gas Facilities" Air Quality Standard Permit NSR authorization under 30 TAC § 116.620.	<input type="checkbox"/> <del>Yes</del> <input checked="" type="checkbox"/> <del>No</del> <input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 5.	The application area includes at least one non-rule Air Quality Standard Permit for Oil and Gas Handling and Production Facilities NSR authorization.	<input type="checkbox"/> <del>Yes</del> <input checked="" type="checkbox"/> <del>No</del> <input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 6.	The application area includes at least one "Municipal Solid Waste Landfill" Air Quality Standard Permit NSR authorization under 30 TAC § 116.621.	<input type="checkbox"/> <del>Yes</del> <input checked="" type="checkbox"/> <del>No</del> <input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 7.	The application area includes at least one "Municipal Solid Waste Landfill Facilities and Transfer Stations" Standard Permit authorization under 30 TAC Chapter 330, Subchapter U.	<input type="checkbox"/> <del>Yes</del> <input checked="" type="checkbox"/> <del>No</del> <input type="checkbox"/> Yes <input type="checkbox"/> No
8.	The application area includes at least one "Concrete Batch Plant" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> <del>Yes</del> <input checked="" type="checkbox"/> <del>No</del> <input type="checkbox"/> Yes <input type="checkbox"/> No
9.	The application area includes at least one "Concrete Batch Plant with Enhanced Controls" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> <del>Yes</del> <input checked="" type="checkbox"/> <del>No</del> <input type="checkbox"/> Yes <input type="checkbox"/> No
10.	The application area includes at least one "Hot Mix Asphalt Plant" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> <del>Yes</del> <input checked="" type="checkbox"/> <del>No</del> <input type="checkbox"/> Yes <input type="checkbox"/> No

# Application Area-Wide Applicability Determinations and General Information

## Form OP-REQ1 (Page 87)

### Federal Operating Permit Program

### Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
July 24, 2025	O2215	RN110300126

For SOP applications, answer ALL questions unless otherwise directed.

◆ For GOP applications, answer ONLY these questions unless otherwise directed.

XII. New Source Review (NSR) Authorizations (continued)		
B. Air Quality Standard Permits (continued)		
◆ 11.	The application area includes at least one "Rock Crusher" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> <del>Yes</del> <input checked="" type="checkbox"/> <del>No</del> <input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 12.	The application area includes at least one "Electric Generating Unit" Air Quality Standard Permit NSR authorization. <i>If the response to XII.B.12 is "No," go to Question XII.B.15.</i>	<input type="checkbox"/> <del>Yes</del> <input checked="" type="checkbox"/> <del>No</del> <input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 13.	For purposes of "Electric Generating Unit" Air Quality Standard Permit, the application area is located in the East Texas Region.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 14.	For purposes of "Electric Generating Unit" Air Quality Standard Permit, the application area is located in the West Texas Region.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 15.	The application area includes at least one "Boiler" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> <del>Yes</del> <input checked="" type="checkbox"/> <del>No</del> <input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 16.	The application area includes at least one "Sawmill" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> <del>Yes</del> <input checked="" type="checkbox"/> <del>No</del> <input type="checkbox"/> Yes <input type="checkbox"/> No
C. Flexible Permits		
1.	The application area includes at least one Flexible Permit NSR authorization.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D. Multiple Plant Permits		
1.	The application area includes at least one Multi-Plant Permit NSR authorization.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

**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
July 24, 2025	O2215	RN110300126

Unit ID No.	Registration No.	PBR No.	Registration Date
B77APFU1	105203 106311	106.261	11/21/2012 01/15/2013
B77APFU1	108295 148427	106.261 106.262	05/09/2013 10/18/2017
B77APFU1	179825	106.261	04/15/2025
B77APCF401	105203	106.261	11/21/2012
B77APCF402	105203	106.261	11/21/2012
B77APD132	148427	106.261 106.262	10/18/2017
B77APPVAV	81988	106.261 106.262	06/12/2007
B78APF1	142435	106.261	10/03/2016
B78APST5	108295	106.261 106.262	05/09/2013

**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
July 24, 2025	O2215	RN110300126

Unit ID No.	PBR No.	Version No./Date
B77APCT1	106.371	09/04/2000
B78APF1 B77APFU1	106.263	11/01/2001
B77APFU1	106.473	09/04/2000
B77APLR133	106.473	09/04/2000
B77APSC01	106.454	<del>11/01/2000</del> <b>07/08/1998</b>
B78APFU1	106.124	09/04/2000
B78APPTT1	106.124	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
July 24, 2025	O2215	RN110300126

PBR No.	Version No./Date
N/A	N/A

**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
July 24, 2025	O2215	RN110300126

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B77APFU1	106.261 106.262	105203 106311	Maintain PBR documentation
B77APFU1	106.261 106.262	108295 148427	Maintain PBR documentation
B77APFU1	106.261	179825	Maintain PBR documentation
B77APCF401	106.261	105203	Maintain PBR documentation
B77APCF402	106.261	105203	Maintain PBR documentation
B77APD132	106.261 106.262	148427	Maintain PBR documentation
B77APPVAV	106.261 106.262	11/01/2003 11/01/2003	Maintain PBR documentation
B78APF1	106.261	142435	Maintain PBR documentation
B78APST5	106.261 106.262	11/01/2003 11/01/2003	Maintain PBR documentation



**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
July 24, 2025	O2215	RN110300126

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B77APCT1	106.371	09/04/2000	Circulation rate is measured, and TDS samples are taken
B78APF1 B77APFU1	106.263	11/01/2001	Track emissions on a 12-month rolling basis
B77APFU1	106.473	09/04/2000	Maintain records of type of liquid loaded/unloaded
B77APLR133	106.473	09/04/2000	Maintain records of type of liquid loaded/unloaded
B77APSC01	106.454	<del>11/01/2000</del> <b>07/08/1998</b>	Maintain records of the solvent TVP and drain area of the cold solvent cleaner
B78APFU1	106.124	09/04/2000	Maintain PBR documentation and track emissions
B78APPTT1	106.124	09/04/2000	Maintain PBR documentation and track emissions

**From:** MartinezJacob(Jacob Martinez)/Operations <j.martinez@sk.com>  
**Sent:** Wednesday, April 30, 2025 8:51 AM  
**To:** Jennifer Tenney  
**Cc:** Baker, Brandon (B); Shaw, Garrett; Sparks, Ellen; Garcia, Annette; MarzoukMarzouk(Marzouk Marzouk)/Reliability & Maintenance  
**Subject:** FW: Project Certification -- FOP O2215/Project 36422, SK Primacor Americas/Adhesives Polymer Plant  
**Attachments:** OP-1.docx; OP-PBRSUP.docx; OP-SUMR.docx; OP-CRO1.pdf; OP-CRO2.pdf  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Good morning,

Please find attached the requested forms.

**Best Regards,**  
**Jacob Martinez**  
**Process Engineer**



2301 N. Brazosport Blvd., B-7701,  
Freeport, TX 77541  
Mobile: +1-832-851-9988

---

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**Sent:** Monday, April 14, 2025 10:29 AM  
**To:** Sparks, Ellen <[Ellen.Sparks@aecom.com](mailto:Ellen.Sparks@aecom.com)>; Shaw, Garrett <[Garrett.Shaw@aecom.com](mailto:Garrett.Shaw@aecom.com)>; Garcia, Annette <[annette.garcia@aecom.com](mailto:annette.garcia@aecom.com)>  
**Cc:** [bbaker4@dow.com](mailto:bbaker4@dow.com); Jacob Martinez/Operations/SKGC <[j.martinez@skgeocentric.com](mailto:j.martinez@skgeocentric.com)>; Marzouk Marzouk/Reliability & Maintenance/SKGC <[m.marzouk@skgeocentric.com](mailto:m.marzouk@skgeocentric.com)>  
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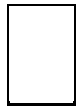
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Jennifer Tenney  
Environmental Permit Specialist I  
TCEQ – APD – OP Section (Title V)  
(512) 239-1830



How are we doing? Fill out our online customer satisfaction survey at [www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

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Thanks!

**Ellen A. Sparks**

Air Quality Specialist, Air Quality & Compliance Practice  
D +1-281-675-3523  
[ellen.sparks@aecom.com](mailto:ellen.sparks@aecom.com)

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[aecom.com](http://aecom.com)



---

**From:** Jennifer Tenney <[Jennifer.Tenney@tceq.texas.gov](mailto:Jennifer.Tenney@tceq.texas.gov)>

**Sent:** Monday, March 17, 2025 5:27 PM

**To:** Sparks, Ellen <[Ellen.Sparks@aecom.com](mailto:Ellen.Sparks@aecom.com)>; Shaw, Garrett <[Garrett.Shaw@aecom.com](mailto:Garrett.Shaw@aecom.com)>; Garcia, Annette <[annette.garcia@aecom.com](mailto:annette.garcia@aecom.com)>

**Cc:** [ssolis5@dow.com](mailto:ssolis5@dow.com); [j.martinez@sk.com](mailto:j.martinez@sk.com)

**Subject:** RE: Project Certification -- FOP O2215/Project 36422, SK Primacor Americas/Adhesives Polymer Plant

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Please let me know if you have any questions.

Thanks  
Jen

**Texas Commission on Environmental Quality**  
**Federal Operating Permit Program**  
**Individual Unit Summary for Revisions**  
**Form OP-SUMR**  
**Table 1**

Date	Permit No.	Regulated Entity No.
04/30/2025	O2215	RN110300126

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
		B77APCF401	OP-UA15	KNOCKOUT VENT		106.261/11/01/2003[105203]	
		B77APCF402	OP-UA15	KNOCKOUT VENT		106.261/11/01/2003[105203]	
		B77APCT1	OP-UA13	CT-1		8567 106.371/09/04/2000	
		B77APD108	OP-UA15	APP MATERIALS HANDLING VENT 108		8567	
		B77APD109	OP-UA15	APP MATERIALS HANDLING VENT 109		8567	
		B77APD132	OP-REQ2	PTZ-EA TOTE		106.261/11/01/2003[148427] 106.262/11/01/2003[148427]	
		B77APFU1	OP-UA1 OP-UA12	B-77 PROCESS FUGITIVES		8567 106.261/11/01/2003[105203, 106311, 108295, 148427, <b>179825</b> ] 106.262/11/01/2003[108295, 148427] 106.473/09/04/2000 106.263/11/01/2003	

**Texas Commission on Environmental Quality  
Federal Operating Permit Program  
Individual Unit Summary for Revisions  
Form OP-SUMR  
Table 1**

Date	Permit No.	Regulated Entity No.
04/30/2025	O2215	RN110300126

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
		B77APLR1	OP-UA4	APP LOADING RACK		8567	
		B77APLR133	OP-UA4	KEROSENE LOADING		8567 106.473/09/04/2000	
		B77APLR750	OP-UA4	D-50 WASTE CATALYST LOADING		8567	
		B77APPT10	OP-UA15	CATALYST MIX TANK		8567	
		B77APPT10A	OP-UA15	CATALYST MIX TANK		8567	
		B77APPT11	OP-UA15	CATALYST MIX TANK		8567	
		B77APPT11A	OP-UA15	CATALYST MIX TANK		8567	
		B77APPT12	OP-UA15	CATALYST MIX TANK		8567	
		B77APPT12A	OP-UA15	CATALYST MIX TANK		8567	
		B77APPVAV	OP-UA15	HRVOC ANALYZERS		106.261/11/01/2003 106.262/11/01/2003 [81988]	

**Texas Commission on Environmental Quality**  
**Federal Operating Permit Program**  
**Individual Unit Summary for Revisions**  
**Form OP-SUMR**  
**Table 1**

Date	Permit No.	Regulated Entity No.
04/30/2025	O2215	RN110300126

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
		B77APRX1	OP-REQ2	APP PROCESS		8567	
		B77APSC01	OP-REQ2	DEGREASER		106.454/07/08/1998	
		B77APSC07	OP-UA16 OP-UA57	B7700 MAINTENANCE & SOLVENT CLEANING		8567	
		B77APSP101	OP-UA15	APP SPIN DRYER VENT 101		8567	
		B77APSPS1	OP-UA14	AP OIL/WATER SEPARATOR SUMP 1		8567	
		B77APSPS2	OP-UA14	AP OIL/WATER SEPARATOR SUMP 2		8567	
		B77APSPS3	OP-UA14	AP OIL/WATER SEPARATOR SUMP 3		8567	
		B77APST1	OP-UA3	KEROSENE STORAGE TANK T-1		8567	
		B77APST10	OP-UA3	AP STORAGE TANK T-10		8567	
		B77APST11	OP-UA3	AP STORAGE TANK T-11		8567	



**Texas Commission on Environmental Quality  
Federal Operating Permit Program  
Individual Unit Summary for Revisions  
Form OP-SUMR  
Table 1**

Date	Permit No.	Regulated Entity No.
04/30/2025	O2215	RN110300126

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
		B77APST12	OP-UA3	AP STORAGE TANK T-12		8567	
		B77APST133	OP-UA3	KEROSENE PROCESS TANK		8567	
		B77APST750	OP-REQ2	APP CATALYST AND WASTE OIL DUMPSTER		8567	
		B77APST8	OP-UA3	AP STORAGE TANK T-8		8567	
		B77APSTT14	OP-UA3	AP STORAGE TANK T-14		8567	
		B77APSTT15	OP-UA3	AP STORAGE TANK T-15		8567	
		B77APV101	OP-UA15	APP SILO V-101, CHECK HOPPER		8567	
		B77APV102	OP-UA15	APP SILO V-102, CHECK HOPPER		8567	
		B77APWW	OP-REQ2	APP POLYETHYLENE WASTE WATER		8567	
		B77SB101	OP-UA15	APP SILO SB-101, MAKE HOPPER		8567	

**Texas Commission on Environmental Quality  
Federal Operating Permit Program  
Individual Unit Summary for Revisions  
Form OP-SUMR  
Table 1**

Date	Permit No.	Regulated Entity No.
04/30/2025	O2215	RN110300126

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
		B77SB102	OP-UA15	APP SILO SB-102, MAKE HOPPER		8567	
		B77SB103	OP-UA15	APP SILO SB-103, MAKE HOPPER		8567	
		B77SB104	OP-UA15	APP SILO SB-104, MAKE HOPPER		8567	
		B77SB105	OP-UA15	APP SILO SB-105, MAKE HOPPER		8567	
		B77SB106	OP-UA15	APP SILO SB-106, MAKE HOPPER		8567	
		B77SB107	OP-UA15	APP SILO SB-107, MAKE HOPPER		8567	
		B77SPS102	OP-UA14	AP SEPARATOR		8567	
		B77SPS103	OP-UA15	AP SEPARATOR		8567	
		B78APF1	OP-UA7 OP-UA15	APP FLARE		8567 106.261/11/01/2003[142435] 106.263/11/01/2003	
		B78APFU1	OP-UA1 OP-UA12	B-78 PROCESS FUGITIVES		8567 106.124/09/04/2000	

**Texas Commission on Environmental Quality  
Federal Operating Permit Program  
Individual Unit Summary for Revisions  
Form OP-SUMR  
Table 1**

Date	Permit No.	Regulated Entity No.
04/30/2025	O2215	RN110300126

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
		B78APKO2A	OP-UA15	APP FLARE KNOCK OUT DRUM D-22		8567	
		B78APPTT1	OP-UA3	ACRYLIC ACID ISOCONTAINER		106.124/09/04/2000	
		B78APST5	OP-UA3	AP STORAGE TANK T-5		8567 106.261/11/01/2003[108295] 106.262/11/01/2003[108295]	
		PROAPP	OP-UA57 OP-UA60	APP PROCESS UNIT		8567	

**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
April 30, 2024	O2215	RN110300126

Unit ID No.	Registration No.	PBR No.	Registration Date
B77APFU1	105203 106311	106.261	11/21/2012 01/15/2013
B77APFU1	108295 148427	106.261 106.262	05/09/2013 10/18/2017
<b><i>B77APFU1</i></b>	<b><i>179825</i></b>	<b><i>106.261</i></b>	<b><i>04/15/2025</i></b>
B77APCF401	105203	106.261	11/21/2012
B77APCF402	105203	106.261	11/21/2012
B77APD132	148427	106.261 106.262	10/18/2017
B77APPVAV	81988	106.261 106.262	06/12/2007
B78APF1	142435	106.261	10/03/2016
B78APST5	108295	106.261 106.262	05/09/2013

**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
April 30, 2024	O2215	RN110300126

Unit ID No.	PBR No.	Version No./Date
B77APCT1	106.371	09/04/2000
B78APF1 B77APFU1	106.263	11/01/2001
B77APFU1	106.473	09/04/2000
B77APLR133	106.473	09/04/2000
B77APSC01	106.454	11/01/2000
B78APFU1	106.124	09/04/2000
B78APPTT1	106.124	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
April 30, 2024	O2215	RN110300126

PBR No.	Version No./Date
N/A	N/A

**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
April 30, 2024	O2215	RN110300126

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B77APFU1	106.261 106.262	105203 106311	Maintain PBR documentation
B77APFU1	106.261 106.262	108295 148427	Maintain PBR documentation
<b><i>B77APFU1</i></b>	<b><i>106.261</i></b>	<b><i>179825</i></b>	<b><i>Maintain PBR documentation</i></b>
B77APCF401	106.261	105203	Maintain PBR documentation
B77APCF402	106.261	105203	Maintain PBR documentation
B77APD132	106.261 106.262	148427	Maintain PBR documentation
B77APPVAV	106.261 106.262	11/01/2003 11/01/2003	Maintain PBR documentation
B78APF1	106.261	142435	Maintain PBR documentation
B78APST5	106.261 106.262	11/01/2003 11/01/2003	Maintain PBR documentation

**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
April 30, 2024	O2215	RN110300126

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B77APCT1	106.371	09/04/2000	Circulation rate is measured, and TDS samples are taken
B78APF1 B77APFU1	106.263	11/01/2001	Track emissions on a 12-month rolling basis
B77APFU1	106.473	09/04/2000	Maintain records of type of liquid loaded/unloaded
B77APLR133	106.473	09/04/2000	Maintain records of type of liquid loaded/unloaded
B77APSC01	106.454	11/01/2000	Maintain records of the solvent TVP and drain area of the cold solvent cleaner
B78APFU1	106.124	09/04/2000	Maintain PBR documentation and track emissions
B78APPTT1	106.124	09/04/2000	Maintain PBR documentation and track emissions



**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. 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 TCEQ.

<b>I. Identifying Information</b>
Account No.: <b>BLA059G</b>
Regulated Entity Number: <b>RN110300126</b>
Customer Reference Number: <b>CN605483213</b>
Permit Number: <b>O2215</b>
Area Name: <b>Adhesive Polymers Plant</b>
Company: <b>SK Primacor Americas LLC</b>
<b>II. Change Type</b>
Action Type: <input checked="" type="checkbox"/> New Appointment <input type="checkbox"/> Administrative Information Change
Contact Type ( <b>only one response accepted per form</b> ): <input checked="" type="checkbox"/> Responsible Official <input type="checkbox"/> Designated Representative ( <i>Acid Rain Program and/or CSAPR sources only</i> ) <input type="checkbox"/> Alternate Designated Representative ( <i>Acid Rain Program and/or CSAPR sources only</i> )

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

**III. Responsible Official/Designated Representative/Alternate Designated Representative Information**

Conventional Title:

- ☒ Mr.  
☐ Mrs.  
☐ Ms.  
☐ Dr.

Name (Driver's License/STEERS): **Marzouk Marzouk**

Title: **Plant Director**

Appointment Effective Date: **04/01/2025**

Telephone Number: **979-824-4670**

Fax Number.:

Company Name: **SK Primacor Americas LLC**

Mailing Address: **2301 Brazosport Blvd B-7700**

City: **Freeport**

State: **TX**

ZIP Code: **77541**

Email Address: **m.marzouk@sk.com**

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

**IV. Certification of Truth, Accuracy, and Completeness**

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

I, Marzouk Marzouk, certify that based on information and belief formed Reasonable inquiry, the statement and information stated above are true, accurate, and complete.

Signature: Marzouk Marzouk

Signature Date: 4-30-25




**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.

<b>I. Identifying Information</b>
RN: <b>RN110300126</b>
CN: <b>CN605483213</b>
Account No.: <b>BLA059G</b>
Permit No.: <b>O2215</b>
Project No.: <b>36422</b>
Area Name: <b>Adhesive Polymers Plant</b>
Company Name: <b>SK Primacor Americas LLC</b>
<b>II. Certification Type</b> <i>(Please mark appropriate box)</i>
<input checked="" type="checkbox"/> Responsible Official Representative <input type="checkbox"/> Duly Authorized Representative
<b>III. Submittal Type</b> <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>
<input type="checkbox"/> SOP/TOP Initial Permit Application <input type="checkbox"/> Permit Revision, Renewal, or Reopening
<input type="checkbox"/> GOP Initial Permit Application <input checked="" type="checkbox"/> Update to Permit Application
<input type="checkbox"/> Other: _____

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

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

<b>IV. Certification of Truth</b>			
<b>This certification does not extend to information which is designated by TCEQ as information for reference only.</b>			
I, <u>Marzouk Marzouk</u>		certify that I am the <u>RO</u>	
<i>(Certifier Name printed or typed)</i>		<i>(RO or DAR)</i>	
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete: <i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>			
Time Period: From <u>04/26/2024</u>		to <u>04/30/2025</u>	
<i>(Start Date)</i>		<i>(End Date)</i>	
Specific Dates: _____			
<i>(Date 1)</i>		<i>(Date 2)</i>	
<i>(Date 3)</i>		<i>(Date 4)</i>	
<i>(Date 5)</i>		<i>(Date 6)</i>	
Signature: <u></u>		Signature Date: <u>4-30-25</u>	
Title: <u>Plant Director</u>			

**Federal Operating Permit Program  
Site Information Summary  
Form OP-1 (Page 3)  
Texas Commission on Environmental Quality**

<b>VII. Technical Contact Identifying Information</b> <i>(Complete if different from RO.)</i>
Technical Contact Name Prefix: ( <input checked="" type="checkbox"/> <b>Mr.</b> <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Technical Contact Full Name: <b>Jacob Martinez</b>
Technical Contact Title: <b>Process Engineer</b>
Employer Name: <b>SK Primacor Americas LLC</b>
Mailing Address: <b>2301 N Brazosport Blvd B-7700</b>
City: <b>Freeport</b>
State: <b>TX</b>
ZIP Code: <b>77541</b>
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.: <b>832-851-9988</b>
Fax No.:
Email: <b>j.martinez@sk.com</b>
<b>VIII. Reference Only Requirements</b> <i>(For reference only.)</i>
<b>A.</b> State Senator: Joan Huffman, Texas State Senate District 17
<b>B.</b> State Representative: Representative Cody Vasut, Texas State House District 25
<b>C.</b> Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</span>
<b>D.</b> Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span>
<b>E.</b> Indicate the alternate language(s) in which public notice is required: Spanish

**From:** Sparks, Ellen <Ellen.Sparks@aecom.com>  
**Sent:** Monday, March 3, 2025 6:51 PM  
**To:** Jennifer Tenney; Shaw, Garrett  
**Cc:** Garcia, Annette; Solis, Sherrie (S); MartinezJacob(Jacob Martinez)/Operations  
**Subject:** RE: REV2 - Working Draft Permit -- FOP 02215/Project 36422, SK Primacor Americas/Adhesives Polymer Plant

Hi Jennifer,

Apologies for the delayed response – we do have an update in this regard.

Upon further investigation, we've discovered that the PBR referenced in the application (81988) is not associated with SK's Adhesive Polymers Plant after all. The correct authorization for the current HRVOC analyzers is under PBR 78668 instead.

SK is currently working on the PBR application to separate out the HRVOC analyzers between Dow and SK and plans to submit it soon. Thank you for your patience as both companies sort through it!

Thank you,

**Ellen A. Sparks**

Air Quality Specialist, Air Quality & Compliance Practice  
D +1-281-675-3523  
[ellen.sparks@aecom.com](mailto:ellen.sparks@aecom.com)

**AECOM**

One Memorial City Plaza  
800 Gessner Road, Suite 1200  
Houston, Texas 77024, US  
T +1-281-646-2400  
[aecom.com](http://aecom.com)



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**From:** Jennifer Tenney <[Jennifer.Tenney@tceq.texas.gov](mailto:Jennifer.Tenney@tceq.texas.gov)>  
**Sent:** Tuesday, February 25, 2025 11:57 AM  
**To:** Shaw, Garrett <[Garrett.Shaw@aecom.com](mailto:Garrett.Shaw@aecom.com)>  
**Cc:** Sparks, Ellen <[Ellen.Sparks@aecom.com](mailto:Ellen.Sparks@aecom.com)>; Garcia, Annette <[annette.garcia@aecom.com](mailto:annette.garcia@aecom.com)>; Solis, Sherrie (S) <[ssolis5@dow.com](mailto:ssolis5@dow.com)>; MartinezJacob(Jacob Martinez)/Operations <[j.martinez@sk.com](mailto:j.martinez@sk.com)>  
**Subject:** RE: REV2 - Working Draft Permit -- FOP 02215/Project 36422, SK Primacor Americas/Adhesives Polymer Plant

Hi Garrett,

Any update on the PBR changes?

Thanks  
Jen

---

**From:** Shaw, Garrett <[Garrett.Shaw@aecom.com](mailto:Garrett.Shaw@aecom.com)>  
**Sent:** Wednesday, January 15, 2025 12:00 PM  
**To:** Jennifer Tenney <[Jennifer.Tenney@tceq.texas.gov](mailto:Jennifer.Tenney@tceq.texas.gov)>  
**Cc:** Sparks, Ellen <[Ellen.Sparks@aecom.com](mailto:Ellen.Sparks@aecom.com)>; Garcia, Annette <[annette.garcia@aecom.com](mailto:annette.garcia@aecom.com)>; Solis, Sherrie (S) <[ssolis5@dow.com](mailto:ssolis5@dow.com)>; MartinezJacob(Jacob Martinez)/Operations <[j.martinez@sk.com](mailto:j.martinez@sk.com)>; Shaw, Garrett <[Garrett.Shaw@aecom.com](mailto:Garrett.Shaw@aecom.com)>  
**Subject:** RE: REV2 - Working Draft Permit -- FOP O2215/Project 36422, SK Primacor Americas/Adhesives Polymer Plant

Jennifer,

Attached is our WDP response.

Additionally, we anticipate having the necessary PBR package for the SK unit(s) currently in PBR 81988 submitted to the TCEQ sometime next week. I will send you an email updating you when it is submitted.

Thanks,

Garrett

**Garrett B. Shaw**

Air Quality Engineer, Air Quality Permitting and Compliance  
[garrett.shaw@aecom.com](mailto:garrett.shaw@aecom.com)

**AECOM**

19219 Katy Frwy., Suite 100  
Houston, Texas 77094,  
[aecom.com](http://aecom.com)

---

**From:** Jennifer Tenney <[Jennifer.Tenney@tceq.texas.gov](mailto:Jennifer.Tenney@tceq.texas.gov)>  
**Sent:** Tuesday, January 7, 2025 12:18 PM  
**To:** Shaw, Garrett <[Garrett.Shaw@aecom.com](mailto:Garrett.Shaw@aecom.com)>  
**Cc:** Sparks, Ellen <[Ellen.Sparks@aecom.com](mailto:Ellen.Sparks@aecom.com)>; Garcia, Annette <[annette.garcia@aecom.com](mailto:annette.garcia@aecom.com)>; Solis, Sherrie (S) <[ssolis5@dow.com](mailto:ssolis5@dow.com)>; MartinezJacob(Jacob Martinez)/Operations <[j.martinez@sk.com](mailto:j.martinez@sk.com)>  
**Subject:** FW: REV2 - Working Draft Permit -- FOP O2215/Project 36422, SK Primacor Americas/Adhesives Polymer Plant

Good Afternoon,



**From:** Shaw, Garrett <Garrett.Shaw@aecom.com>  
**Sent:** Wednesday, January 15, 2025 12:00 PM  
**To:** Jennifer Tenney  
**Cc:** Sparks, Ellen; Garcia, Annette; Solis, Sherrie (S); MartinezJacob(Jacob Martinez)/Operations; Shaw, Garrett  
**Subject:** RE: REV2 - Working Draft Permit -- FOP O2215/Project 36422, SK Primacor Americas/Adhesives Polymer Plant  
**Attachments:** O2215 2025-01-15 WDP Response.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Jennifer,

Attached is our WDP response.

Additionally, we anticipate having the necessary PBR package for the SK unit(s) currently in PBR 81988 submitted to the TCEQ sometime next week. I will send you an email updating you when it is submitted.

Thanks,

Garrett

**Garrett B. Shaw**

Air Quality Engineer, Air Quality Permitting and Compliance  
[garrett.shaw@aecom.com](mailto:garrett.shaw@aecom.com)

**AECOM**

19219 Katy Frwy., Suite 100  
Houston, Texas 77094,  
[aecom.com](http://aecom.com)

---

**From:** Jennifer Tenney <Jennifer.Tenney@tceq.texas.gov>  
**Sent:** Tuesday, January 7, 2025 12:18 PM  
**To:** Shaw, Garrett <Garrett.Shaw@aecom.com>  
**Cc:** Sparks, Ellen <Ellen.Sparks@aecom.com>; Garcia, Annette <annette.garcia@aecom.com>; Solis, Sherrie (S) <ssolis5@dow.com>; MartinezJacob(Jacob Martinez)/Operations <j.martinez@sk.com>  
**Subject:** FW: REV2 - Working Draft Permit -- FOP O2215/Project 36422, SK Primacor Americas/Adhesives Polymer Plant

Good Afternoon,

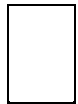
Please review the attached Revision 2 Working Draft Permit (WDP). Please review and respond with any comments by **Wednesday, January 15, 2025**.

Please note that I have highlighted Registration number 81988; the change of ownership will need to be resolved before the Title V project can proceed any further in the process. It was mentioned below that

units in the PBR are split between SK and DOW. Will this require a new permit to be issued?. Please let me know if you have a timeline on this.

Thanks  
Jen

Jennifer Tenney  
Environmental Permit Specialist I  
TCEQ – APD – OP Section (Title V)  
(512) 239-1830



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**From:** Shaw, Garrett <[Garrett.Shaw@aecom.com](mailto:Garrett.Shaw@aecom.com)>  
**Sent:** Monday, December 30, 2024 3:08 PM  
**To:** Jennifer Tenney <[Jennifer.Tenney@tceq.texas.gov](mailto:Jennifer.Tenney@tceq.texas.gov)>  
**Cc:** Sparks, Ellen <[Ellen.Sparks@aecom.com](mailto:Ellen.Sparks@aecom.com)>; Garcia, Annette <[annette.garcia@aecom.com](mailto:annette.garcia@aecom.com)>; Solis, Sherrie (S) <[ssolis5@dow.com](mailto:ssolis5@dow.com)>; [j.martinez@sk.com](mailto:j.martinez@sk.com)  
**Subject:** RE: REV - Working Draft Permit -- FOP O2215/Project 36422, SK Primacor Americas/Adhesives Polymer Plant

Jennifer,

I do not have a response or know of a timeline for your question. I will try to get an answer for you from the others involved in the project.

Thanks,

Garrett

**Garrett B. Shaw**

Air Quality Engineer, Air Quality Permitting and Compliance  
[garrett.shaw@aecom.com](mailto:garrett.shaw@aecom.com)

**AECOM**

19219 Katy Frwy., Suite 100  
Houston, Texas 77094,  
[aecom.com](http://aecom.com)

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**From:** Jennifer Tenney <[Jennifer.Tenney@tceq.texas.gov](mailto:Jennifer.Tenney@tceq.texas.gov)>  
**Sent:** Monday, December 30, 2024 1:03 PM  
**To:** Shaw, Garrett <[Garrett.Shaw@aecom.com](mailto:Garrett.Shaw@aecom.com)>

SK Primacor Americas O2215  
WDP Response

**SK is responding to the WDP Comments, Received from TCEQ on November 22, 2024**  
**Comments based on the WDP Received from TCEQ on January 7, 2025.**

3. TCEQ Comment	<p>OP-PBRSUP – Table A – B77APPVAV – cannot have an “Unknown” Registration No. as this table is for registered permits so there needs to be a registration number.</p> <p><b>SK has added the PBR registration number for this unit ID, however, as is the case with the answer to question 1 above, the registration is under Dow’s ownership and will need to be transferred to SK. The applicable forms will be submitted.</b></p> <p>TCEQ Response: Registration number 81988 has been added to the permit for B77APPVAV. However, it does not appear that the change of ownership has been done yet. If this request was already submitted, please let me know when. If not, please submit the change of ownership for this registration as soon as possible.</p> <p><b>SK: An ownership transfer for this PBR has not yet been submitted. Upon further review, the PBR contains units that belong to both Dow and SK, and the PBR will need to be split apart to be transferred. SK is working on completing this with appropriate Dow contacts and will submit as soon as possible.</b></p> <p>TCEQ Email, 01/07/2025: Please note that I have highlighted Registration number 81988; the change of ownership will need to be resolved before the Title V project can proceed any further in the process. It was mentioned below that units in the PBR are split between SK and DOW. Will this require a new permit to be issued? Please let me know if you have a timeline on this.</p> <p><b>SK, 01/15/2025: A new PBR package to transfer the unit from Dow to SK is being worked on. We will update you once it has been submitted.</b></p>
5. TCEQ Comment	<p>OP-CRO1 – The initial application was signed/submitted in STEERS by a person who was not the responsible official (RO). Therefore, we still need a valid certification for that application. When you submit an OP-CRO1 to certify all your application updates, responses, and WDP comments, we will just need to ensure that it includes the date of 02/14/2024. If you’d liked to wait until we resolve any comments/issues before submitting that, that is acceptable.</p> <p><b>SK is requesting to wait until all comments / issues have been resolved to submit the OPCRO1 and will include the date of 02/14/2024 on the form when it is signed and submitted by the RO.</b></p> <p>TCEQ Response: Thank you we will anticipate a final OP-CRO1.</p> <p><b>SK: Acknowledged.</b></p>

Additional Comments from SK:

<p>1. SK Comment</p>	<p>SK is requesting to update the citations associated with Unit IDs B78APF1 and PROAPP in the current permit based on the updates to 40 CFR Part 63, Subpart FFFF that went into place on August 12, 2023. Please see attached form OP-REQ3 for more information.</p> <p>TCEQ Response: Citations have been added and removed as requested based on the August 12, 2023 amendment.</p> <p><b>SK: Changes to citations associated with Unit IDs B78APF1 and PROAPP not found in WDP. SK is requesting to update the citations associated with Unit IDs B78APF1 and PROAPP in the current permit based on the updates to 40 CFR Part 63, Subpart FFFF that went into place on August 12, 2023. Please see attached form OP-REQ3 for more information.</b></p> <p><b>SK, 01/15/2025: Unit PROAPP, SOP Index 63FFFF-01, please correct the Emission Limitation Standard Citation for PROAPP: 63.2450(l) is wrongly entered as 63.2450(1) in current WDP permit. (It should be a lower case L, (l), but is currently the number one, (1))</b></p>
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**From:** Jennifer Tenney  
**Sent:** Thursday, December 12, 2024 7:43 AM  
**To:** c.phillips@sk.com  
**Cc:** R12APDMail; jodieV@brazoria-county.com  
**Subject:** FW: Notice of Delinquent Fee and/or Penalty for SK Primacor Americas LLC  
**Attachments:** 36422.docx

Chaney Phillips,

Attached is a notice of delinquent fee and/or penalty concerning your request for the Adhesives Polymer Plant received on February 14, 2024. Please refer to the attached letter for the current status of your request, the deficient item(s) that require your attention and the detailed instructions on how to respond.

Thank you,

Jennifer Tenney  
Environmental Permit Specialist I  
TCEQ – APD – OP Section (Title V)  
(512) 239-1830

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Jon Niermann, *Chairman*  
Bobby Janecka, *Commissioner*  
Catarina R. Gonzales, *Commissioner*  
Kelly Keel, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

December 11, 2024

Re: SK Primacor Americas LLC  
Adhesives Polymer Plant  
Freeport, Brazoria County  
Permit Number: O2215  
CN605483213 / RN110300126

The staff of the Texas Commission on Environmental Quality (TCEQ) has determined that payment of the following fees and/or penalties by SK Primacor Americas LLC is required before your application may be considered for issuance:

Account Number	Fee Type	Facility/Permit	Fee Amount
0319086G	HWG	97443	923.60
0319086N	NWG	97443	46.20

**Please be advised that failure to pay fees/penalties within 10 days will result in additional administrative actions affecting your fee accounts and your application with TCEQ. With respect to fees and/or penalties, these actions may include enforcement and collections efforts to recover the debt owed to the state.**

If you believe that your liability for any portion of the delinquency noted above has been discharged in bankruptcy, or if you are presently a debtor in a pending bankruptcy proceeding, please immediately furnish the undersigned with file-stamped copies of the following pleadings from the bankruptcy court where your bankruptcy case was/is filed: (1) Bankruptcy Petition; (2) Schedules and Statement of Affairs; (3) Creditor Matrix/Matrices; and (4) Discharge Order or Confirmation Order. Please mail those copies to the TCEQ at P.O. Box 13087, Mail Code 132, Austin, TX 78711-3087, and include any additional documents from the bankruptcy court that you believe are relevant to your responsibilities for the noted delinquency. We will immediately review these pleadings and take appropriate action regarding your permit application.

Payment may be made through the following methods: cash, check, ACH (electronic check), money order, or credit card through TCEQ electronic payment portal (e-pay). Additional information regarding payment options is available at [www.tceq.texas.gov/agency/financial/fees/delin/index.html](http://www.tceq.texas.gov/agency/financial/fees/delin/index.html). Upon payment, please send documentation reflecting payment of all delinquent fees and penalties to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087. If you have any questions regarding your delinquent fees or penalties you may contact a Program Fee Coordinator listed on the attachment provided or if you need a copy of your billing statement you may contact TCEQ Financial Administration Division at (512) 239-0300. If you have any questions regarding the delinquent fees or penalties process you may contact Ms. Jennifer Tenney at (512) 239-1830.

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**Program Fee Coordinators as of March 2019**

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<b>FEE</b>	<b>FEE TYPE</b>	<b>PROGRAM FEE COORD.</b>
AEF	AIR EMISSIONS FEE	AQPI Division (512) 239-1459
AST	ABOVEGROUND STORAGE TANKS	PST Registration Team (512) 239-2160
BLP	WATERSHED MGMT. BENEF. LAND APPLIC.	Michael Anstice (512) 239-4327
BWM	BRAZOS WATER MASTER	Molly Mohler (254)-761-3027
BYP	RADIOACTIVE BY-PRODUCTS DISPOSAL	Tom Robichaux (512) 239-6455
CAV	ADMIN PENAL - AIR POLL	Zaynah Thomas (512) 239-0343
CDP	HW COMMERCIAL (MGMT FEES)/COUNTY PMT	Susie Medrano (512) 239-0517
CRW	CONCHO RIVER WATERMASTER	Alisha Multer (325) 481-8069
CWQ	CONSOLIDATED WATER QUALITY FEE	WQ Applications Team (512) 239-4671
DCP	ADMIN PENAL - DRY CLEANING	Zaynah Thomas (512) 239-0343
DCR	DRYCLEANING REGISTRATION FEE	Drycleaner Reg. Team (512) 239-2160
EIF	AIR INSPECTION FEE	AQPI Division (512) 239-1459
GPS	GENERAL PERMIT STORMWATER FEE	Stormwater Permit Team (512) 239-3700 *
GPW	GENERAL PERMIT WASTEWATER FEE	Stormwater Permit Team (512) 239-4671 *
HWC	HW COMMERCIAL (MGMT FEES)/COUNTY PMT	Susie Medrano (512) 239-0517
HWF	HAZARDOUS WASTE FACILITY	Susie Medrano (512) 239-0517
HWG	HAZARDOUS WASTE GENERATION	Andi Windham (512) 239-1325
HWX	HW COMMERCIAL (MGMT FEES)/COUNTY PMT	Susie Medrano (512) 239-0517
ILP	INNOCENT LANDOWNER	Jennifer Westerman (512) 239-5969
NWF	NONHAZARDOUS WASTE FACILITY	Susie Medrano (512) 239-0517
NWG	NONHAZARDOUS WASTE GENERATION	Andi Windham (512) 239-1325
Penalties	ADMIN PENALTIES - CAV, WDV, WQV, DCP, QWV	Brenda Loggins (512) 239-5136
PHS	PUBLIC HEALTH SERVICE	Public Drinking Water (512) 239-4691
RAF	REGULATORY ASSESSMENT FEE	Teri Cisneros (512) 239-6963
RGR	RIO GRANDE WATERMASTER	Jose Davila (830) 773-5059
RLA	RADIOACTIVE SUBSTANCE LICENSING FEE	Kathryn Ploch (512) 239-6577
SDP	SURFACE DISPOSAL FEE	Michael Anstice (512) 239-4327
STX	SOUTH TEXAS WATERMASTER	Alisha Multer (325) 481-8069
SWD	SOLID WASTE DISPOSAL FACILITIES	Susie Medrano (512) 239-0517
SWM	SOLID WASTE MEDICAL TRANSPORTER FEE	Gwinda Casper (512) 239-6814
TOX	TOXIC REPORTING FEE	Blake Kidd (512) 239-1441
T2M,T2NM,T2PE	TIER II CHEMICAL REPORTING	Ann Adams (512) 239-5064
UST	UNDERGROUND STORAGE TANKS	PST Registration Team (512) 239-2160
VCP	VOLUNTARY CLEAN-UP	Jennifer Westerman (512) 239-5969
WDV	ADMN PENAL - WASTE DISP	Zaynah Thomas (512) 239-0343
WMB	WATERSHED MGMT. BENEF. LAND USE	ARP Team (512) 239-4671
WMS	WATERSHED MGMT. SLUDGE HAULERS	Gwinda Casper (512) 239-6814
WQV	ADMIN PENAL - WATER QUAL	Zaynah Thomas (512) 239-0343
WRU	WU REGULATORY ASSESSMENT FEES	Terri Cisneros (512) 239-6963
WTR	WASTEWATER TRTMT. RESRCH. COUNCIL	Tanya Mitchell (512) 239-1937
WUF	WATER USE ASSESSMENT (WTR. RIGHTS)	Sarah Eagle (512) 239-6329

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\* Notes:

GPW permit processing handled by App. Review & Processing Team, x4671

GPS permit processing handled by the University of Texas at Arlington at (512) 239-3700 or

[swpermit@tceq.state.tx.us](mailto:swpermit@tceq.state.tx.us)

For invoice copies, or an explanation of late fees and cost recovery fees, please call the Revenue Section at (512) 239-0369. For an explanation of the fee assessment, please call the Program Fee Coordinator listed above for the applicable fee.

**From:** Shaw, Garrett <Garrett.Shaw@aecom.com>  
**Sent:** Friday, December 6, 2024 4:39 PM  
**To:** Jennifer Tenney  
**Cc:** Sparks, Ellen; Garcia, Annette; Solis, Sherrie (S); j.martinez@sk.com; Shaw, Garrett  
**Subject:** RE: REV - Working Draft Permit -- FOP O2215/Project 36422, SK Primacor Americas/Adhesives Polymer Plant  
**Attachments:** Form OP-PBRUP.docx; Form OP-REQ1\_pg14\_IV-C-1.docx; Form OP-REQ3.docx; O2215 T5 WDP Response\_2024-12-06.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Howdy Jennifer,

Responding to your email on behalf of Ellen and SK, please see attached for a response to the working draft permit, with associated forms updated as part of the response.

If you have any questions, please reach out!

Thank you,

Garrett

**Garrett B. Shaw**

Air Quality Engineer, Air Quality Permitting and Compliance  
[garrett.shaw@aecom.com](mailto:garrett.shaw@aecom.com)

**AECOM**

19219 Katy Frwy., Suite 100  
Houston, Texas 77094,  
[aecom.com](http://aecom.com)

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**From:** Jennifer Tenney <[Jennifer.Tenney@tceq.texas.gov](mailto:Jennifer.Tenney@tceq.texas.gov)>  
**Sent:** Friday, November 22, 2024 5:08 PM  
**To:** Sparks, Ellen <[Ellen.Sparks@aecom.com](mailto:Ellen.Sparks@aecom.com)>  
**Cc:** [ssolis5@dow.com](mailto:ssolis5@dow.com); [j.martinez@sk.com](mailto:j.martinez@sk.com); Garcia, Annette <[annette.garcia@aecom.com](mailto:annette.garcia@aecom.com)>  
**Subject:** REV - Working Draft Permit -- FOP O2215/Project 36422, SK Primacor Americas/Adhesives Polymer Plant

Ellen,

I have reviewed your WDP comments and prepared the attached revised WDP. The other attachment has my responses to your comments explaining what changes have been made. A few of the items have questions for you. Please review the revised WDP and submit any comments you have on by **December 6, 2024**. Since this is a follow-up review to the previously submitted and reviewed WDP, only comments concerning changes since the last WDP may be considered by TCEQ. Any comments outside the scope of the most recent changes should be submitted as a separate project. Please also address my remaining questions for you by that date.



SK Primacor Americas O2215  
WDP Response

SK is responding to the WDP Comments, Received from TCEQ on November 22, 2024

1. TCEQ Comment	<p>A Change of Name/Ownership form will need to be submitted for PBR Registration Nos. 105203, 106311, 108295, 148427, and 142435. These were listed on the OP-PBRSUP but are still under a previous company name in our database so need to be under the current company.</p> <p><b>SK is currently preparing the ownership transfer forms for the PBRs listed above. They were inadvertently missed during the initial company split, however the equipment that they authorize is owned by SK, and therefore SK is requesting that they remain listed in O2215.</b></p> <p>TCEQ Response: Thanks for submitting the forms – ownership has been transferred for all of these authorizations and they will remain in the permit.</p> <p><b>SK: Acknowledged.</b></p>
2. TCEQ Comment	<p>OP-PBRSUP – Table A – Registration date needs to be changed to the date the registration number was issued (not the PBR version date).</p> <p><b>Please see attached for the revised Form OP-PBRSUP with corrected registration dates.</b></p> <p>TCEQ Response: The permit will include a reference to the most recent submittal of this form, so whenever the form is updated, it needs to be re-dated in the header. The form still has the February 14<sup>th</sup> date. Please re-date all four tables (including month, day, and year).</p> <p><b>SK: A revised PBRSUP is being attached with all four tables re-dated to the date of submission of this response.</b></p>
3. TCEQ Comment	<p>OP-PBRSUP – Table A – B77APPVAV – cannot have an “Unknown” Registration No. as this table is for registered permits so there needs to be a registration number.</p> <p><b>SK has added the PBR registration number for this unit ID, however, as is the case with the answer to question 1 above, the registration is under Dow’s ownership and will need to be transferred to SK. The applicable forms will be submitted.</b></p> <p>TCEQ Response: Registration number 81988 has been added to the permit for B77APPVAV. However, it does not appear that the change of ownership has been done yet. If this request was already submitted, please let me know when. If not, please submit the change of ownership for this registration as soon as possible.</p> <p><b>SK: An ownership transfer for this PBR has not yet been submitted. Upon further review, the PBR contains units that belong to both Dow and SK, and the PBR will need to be split apart to be transferred. SK is working on completing this with appropriate Dow contacts and will submit as soon as possible.</b></p>

4. TCEQ Comment	<p>OP-SUMR – Registration numbers need to be added to the units being authorized by PBRs. Please see OP-SUMR instructions for format.</p> <p><b>Please see attached for the revised Form OP-SUMR with added registration numbers.</b></p> <p>Thank you.</p> <p><b>SK: Acknowledged.</b></p>
5. TCEQ Comment	<p>OP-CRO1 – The initial application was signed/submitted in STEERS by a person who was not the responsible official (RO). Therefore, we still need a valid certification for that application. When you submit an OP-CRO1 to certify all your application updates, responses, and WDP comments, we will just need to ensure that it includes the date of 02/14/2024. If you'd liked to wait until we resolve any comments/issues before submitting that, that is acceptable.</p> <p><b>SK is requesting to wait until all comments / issues have been resolved to submit the OPCRO1 and will include the date of 02/14/2024 on the form when it is signed and submitted by the RO.</b></p> <p>TCEQ Response: Thank you we will anticipate a final OP-CRO1.</p> <p><b>SK: Acknowledged.</b></p>
6. TCEQ Comment	<p>Alternative Means of Control (AMOC) –The letter in the application seems to be a letter denying the alternative request. If that is all you have, then you do not have an approved alternative and you should update the relevant OP-REQ1 question to “No”. Is there a different alternative approval letter you would like to include?</p> <p><b>The AMOC letter that was included as a part of the application references the denial of Method 22 testing on the flare, however it does include that the use of the flowmeter and gas chromatograph installed on the flare qualify in lieu of having to perform a stack test. For this reason, SK is requesting to keep the letter as a part of the permit to show compliance with stack testing requirements through the use of the installed equipment referenced in the letter. SK understands that the equipment does not show compliance with the flare being “smokeless”, therefore, the need to conduct Method 22 is still a requirement and was not waived with the letter. SK performed the Method 22 request on March 11, 2008.</b></p> <p>TCEQ Response: Thanks for clarifying that while the AMOC letter denies a portion of the alternative request, it also approves another portion regarding alternative monitoring in lieu of conducting a stack test. We agree the letter should remain in the permit.</p> <p>The applicable requirements summary table will include a note to see alternative requirements in the monitoring testing column for any units that are affected. Please indicate which rows of the table will need this note.</p> <p><b>SK: B78APF1, APP Flare, is affected by this AMOC. Please attach a note to see alternative requirements in the Monitoring and Testing Requirements column of this unit, SOP Index No. 63FFFF-01.</b></p>

Additional Comments from SK:

1. SK Comment	<p>SK is requesting to update the citations associated with Unit IDs B78APF1 and PROAPP in the current permit based on the updates to 40 CFR Part 63, Subpart FFFF that went into place on August 12, 2023. Please see attached form OP-REQ3 for more information.</p> <p><b>TCEQ Response:</b> Citations have been added and removed as requested based on the August 12, 2023 amendment.</p> <p><b>SK: Changes to citations associated with Unit IDs B78APF1 and PROAPP not found in WDP. SK is requesting to update the citations associated with Unit IDs B78APF1 and PROAPP in the current permit based on the updates to 40 CFR Part 63, Subpart FFFF that went into place on August 12, 2023. Please see attached form OP-REQ3 for more information.</b></p>
2. SK Comment	<p>Per Revision No. 2 in Form OP-2, SK requested to remove the NSPS DDD and VV permit shields from two sources, B77APFU1 and B78APFU1. Please remove these permit shields from the working draft permit.</p> <p><b>Section 63.2535(k) refers to VV (may elect to apply this sub part)</b> <b>Section 63.2535(h) refers to DDD (may elect to apply this sub part)</b></p> <p><b>TCEQ Response:</b> The NSPS DDD and VV permit shields have been removed from these two units.</p> <p><b>SK: Permit shields have not been removed from B78APFU1. Per Revision No. 2 in Form OP-2, SK requested to remove the NSPS DDD and VV permit shields from source B78APFU1. Please remove these permit shields form the working draft permit.</b></p>
3. SK Comment	<p>Please remove the duplicate permit shield entries for 40 CFR Part 60, Subpart Kb and 40 CFR Part 61, Subpart FF for unit B77APD132 from the working draft permit. The correct negative applicability reason for 60 CFR Part 61, Subpart FF should be “Does not store or contain benzene waste”.</p> <p><b>TCEQ Response:</b> The extra entries for these two rules have been removed and the NESHAP FF shield reason uses the specified language.</p> <p><b>SK: Acknowledged.</b></p>

4. SK Comment	<p>Please remove the duplicate permit shield entries for 40 CFR Part 60, Subpart Kb and 40 CFR Part 61, Subpart FF for unit B78APPTT1 from the working draft permit. The correct negative applicability reason for 60 CFR Part 61, Subpart FF should be “Does not store or contain benzene waste”.</p> <p>TCEQ Response: The extra entries for these two rules have been removed and the NESHAP FF shield reason uses the specified language.</p> <p><b>SK: Acknowledged.</b></p>
5. SK Comment	<p>Please add ST&amp;C number 1.G, relating to compliance with 30 TAC Chapter 101, Subchapter H, Division 3 (Mass Emission Cap and Trade Program), back into the permit. SK believes this requirement still applies and was inadvertently removed from the permit.</p> <p>TCEQ Response: 30 TAC Chapter 101, Subchapter H, Division 3 only applies if the site is also subject to Chapter 117. The current answers on Form OP-REQ1 indicated that the site was not subject to any portions of Chapter 117. Previously, question IV.C.1 (related to Chapter 117, Subchapter B) was marked as Yes, but in this application it was answered “No”. Please submit a corrected page with IV.C.1 updated to Yes in order for us to add the related Chapter 101 terms.</p> <p><b>SK: A corrected OP-REQ1 page with IV.C.1 updated to “Yes” has been attached to this response.</b></p> <p><b>Please add ST&amp;C number 1.G, relating to compliance with 30 TAC Chapter 101, Subchapter H, Division 3 (Mass Emission Cap and Trade Program), back into the permit.</b></p>
6. SK Comment	<p>Please add ST&amp;C number 19, relating to compliance with 30 TAC Chapter 117, back into the permit. SK believes this requirement still applies and was inadvertently removed from the permit.</p> <p>TCEQ Response: The current answers on Form OP-REQ1 indicated that the site was not subject to any portions of Chapter 117, so that is why the Chapter 117 terms were not included. Previously, question IV.C.1 was marked as Yes, but in this application it was answered “No”. Please submit a corrected page with IV.C.1 updated to Yes in order for us to add the terms.</p> <p><b>SK: A corrected OP-REQ1 page with IV.C.1 updated to “Yes” has been attached to this response.</b></p> <p><b>Please add ST&amp;C number 19, relating to compliance with 30 TAC Chapter 117, back into the permit.</b></p>

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

**Table 1a: Additions**

<b>Date:</b> December 6, 2024	<b>Regulated Entity No.:</b> RN110300126	<b>Permit No.:</b> O2215
<b>Company Name:</b> SK Primacor Americas LLC	<b>Area Name:</b> Adhesive Polymers 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)
	B78APF1	OP-UA15	63FFFF-01	HAPS	40 CFR Part 63, Subpart FFFF	63.11(b), 63.2450(b), 63.2455(a)-Table 1.1.a.ii, (a)-(b), (b)(1), <del>63.982(b)</del> , 63.983(a)(1)-(2), (d)(1), (d)(1)(i), 63.983[G](d)(2), (d)(3), <del>63.987(a), 63.997(b)(2)-(3), (e)(3)</del> , <b>63.2450(a)(2), (e)(4), (e)(5), (e)(6), (k)(8), (u), 63.2535(m)(1)-(2)</b>
	PROAPP	OP-UA60	63FFFF-01	HAPS	40 CFR Part 63, Subpart FFFF	63.2440(a), 63.2450(a), (l), <b>63.2450(a)(2), 63.2450(e)(4), 63.2450(g)(7), 63.2450(k)(8), 63.2450(t), 63.2450(u), 63.2450(v)</b>

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program**

**Table 1b: Additions**

<b>Date:</b> December 6, 2024	<b>Regulated Entity No.:</b> RN110300126	<b>Permit No.:</b> O2215
<b>Company Name:</b> SK Primacor Americas LLC	<b>Area Name:</b> Adhesive Polymers Plant	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
	B78APF1	63FFFF-01	HAPS	[G]63.115(d)(2)(v), <del>(d)(3)(iii)</del> , 63.983(b), [G](b)(1)-(3), [G](c)(1), 63.983(c)(2)-(3), (d)(1), (d)(1)(ii), <del>63.987(e)</del> , <del>63.997(b), (e)(2)-(3)</del> , <del>63.997(e)(3)(i)-(ii)</del>	63.983(b), [G](d)(2), <del>63.987(e)</del> , <del>63.998(a)(1)(ii)</del> , <del>(a)(1)(iii)(A)-(B)</del> , [G]63.998(b)(1)- <del>(3)</del> , <del>[G](b)(5)</del> , [G]63.998(d)(1), <del>(d)(3)(i)-(ii), (d)(5)</del> , <del>63.2450(f)(2), (f)(2)(i)-(ii)</del> , <del>63.2450(k)(1)(ii)</del> , <del>(k)(7)</del> , <b>63.2525(m), (n)</b>	<del>63.997(b)(2), (e)(3)</del> , <del>63.998(a)(1)(iii)(A)</del> , [G](b)(3), [G]63.999(a)(1), (b)(5), (c)(1), 63.999(c)(2)(i), <del>(e)(3)</del> , (c)(6), <del>[G]63.999(e)(6)(i), (e)(6)(iv)</del> , [G]63.999(d)(1)-(2), <del>63.2450(f)(2)(ii), (e)</del> , <b>63.2520(d)(3), (e)(11), (e)(12)</b>
	PROAPP	63FFFF-01	HAPS	63.2445(d), <b>63.2450(g)(6)</b>	63.2525, (a), [G](b), (c), <del>(f), (j)</del> , <b>63.2525(p)</b>	63.2435(d), 63.2445(c), 63.2450(g)(5), (m), (m)(1)-(2), 63.2515(a), (b)(1), (c), 63.2520(a) [G]63.2520(b)-(d), (e), (e)(1), [G]63.2520(e)(10), <del>(e)(2)-(5)</del> , <del>(e)(2)-(3), (5)</del> , 63.2520(e)(5)(i), [G]63.2520(e)(5)(ii)-(iii), 63.2520(e)(6)-(7), (e)(9), <b>(e)(14)</b>

# Application Area-Wide Applicability Determinations and General Information

## Form OP-REQ1 (Page 14)

### Federal Operating Permit Program

### Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
December 6, 2024	O2215	RN110300126

For SOP applications, answer ALL questions unless otherwise directed.

◆ For GOP applications, answer ONLY these questions unless otherwise directed.

<b>IV. Title 30 TAC Chapter 117 - Control of Air Pollution from Nitrogen Compounds (continued)</b>		
<b>C. Commercial, Institutional, and Industrial Sources in Ozone Nonattainment Areas</b>		
◆ 1.	The application area is located at a site subject to 30 TAC Chapter 117, Subchapter B and includes units specified in 30 TAC §§ 117.100, 117.300, or 117.400. <i>For SOP applications, if the response to Question IV.C.1 is "No," go to Question IV.D.1. For GOP applications for GOP 517, if the response to Question IV.C.1 is "No," go to Section IV.F.</i>	<input checked="" type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>NO</b> <input type="checkbox"/> <del>Yes</del> <input checked="" type="checkbox"/> <del>NO</del>
◆ 2.	The application area is located at a site that was a major source of NO <sub>x</sub> before November 15, 1992.	<input checked="" type="checkbox"/> <b>Yes</b> <input type="checkbox"/> No <input type="checkbox"/> N/A
◆ 3.	The application area includes an electric generating facility required to comply with the System Cap in 30 TAC § 117.320.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> <b>No</b>
<b>D. Adipic Acid Manufacturing</b>		
1.	The application area is located at, or part of, an adipic acid production unit.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
<b>E. Nitric Acid Manufacturing - Ozone Nonattainment Areas</b>		
1.	The application area is located at, or part of, a nitric acid production unit.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
<b>F. Combustion Control at Minor Sources in Ozone Nonattainment Areas - Boilers, Process Heaters, Stationary Engines and Gas Turbines</b>		
◆ 1.	The application area is located at a site that is a minor source of NO <sub>x</sub> in the Houston/Galveston/Brazoria or Dallas/Fort Worth Eight-Hour areas (except for Wise County). <i>For SOP applications, if the response to Question IV.F.1 is "No," go to Question IV.G.1. For GOP applications, if the response to Question IV.F.1 is "No," go to Section VI.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆ 2.	The application area is located in the Houston/Galveston/Brazoria area and has units that qualify for an exemption under 30 TAC § 117.2003(a).	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 3.	The application area is located in the Houston/Galveston/Brazoria area and has units that qualify for an exemption under 30 TAC § 117.2003(b).	<input type="checkbox"/> Yes <input type="checkbox"/> No

**Permit By Rule Supplemental Table (Page 1)**  
**Table A: Registered Permits by Rule (30 TAC Chapter 106) for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
December 6, 2024	O2215	RN110300126

Unit ID No.	Registration No.	PBR No.	Registration Date
B77APFU1	105203 106311	106.261	11/21/2012 01/15/2013
B77APFU1	108295 148427	106.261 106.262	05/09/2013 10/18/2017
B77APCF401	105203	106.261	11/21/2012
B77APCF402	105203	106.261	11/21/2012
B77APD132	148427	106.261 106.262	10/18/2017
B77APPVAV	81988	106.261 106.262	06/12/2007
B78APF1	142435	106.261	10/03/2016
B78APST5	108295	106.261 106.262	05/09/2013



**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
December 6, 2024	O2215	RN110300126

Unit ID No.	PBR No.	Version No./Date
B77APCT1	106.371	09/04/2000
B78APF1 B77APFU1	106.263	11/01/2001
B77APFU1	106.473	09/04/2000
B77APLR133	106.473	09/04/2000
B77APSC01	106.454	11/01/2000
B78APFU1	106.124	09/04/2000
B78APPTT1	106.124	09/04/2000

**Permit By Rule Supplemental Table (Page 4)**  
**Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
December 6, 2024	O2215	RN110300126

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B77APFU1	106.261 106.262	105203 106311	Maintain PBR documentation
B77APFU1	106.261 106.262	108295 148427	Maintain PBR documentation
B77APCF401	106.261	105203	Maintain PBR documentation
B77APCF402	106.261	105203	Maintain PBR documentation
B77APD132	106.261 106.262	148427	Maintain PBR documentation
B77APPVAV	106.261 106.262	11/01/2003 11/01/2003	Maintain PBR documentation
B78APF1	106.261	142435	Maintain PBR documentation
B78APST5	106.261 106.262	11/01/2003 11/01/2003	Maintain PBR documentation

**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
December 6, 2024	O2215	RN110300126

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B77APCT1	106.371	09/04/2000	Circulation rate is measured, and TDS samples are taken
B78APF1 B77APFU1	106.263	11/01/2001	Track emissions on a 12-month rolling basis
B77APFU1	106.473	09/04/2000	Maintain records of type of liquid loaded/unloaded
B77APLR133	106.473	09/04/2000	Maintain records of type of liquid loaded/unloaded
B77APSC01	106.454	11/01/2000	Maintain records of the solvent TVP and drain area of the cold solvent cleaner
B78APFU1	106.124	09/04/2000	Maintain PBR documentation and track emissions
B78APPTT1	106.124	09/04/2000	Maintain PBR documentation and track emissions

**From:** Sparks, Ellen <Ellen.Sparks@aecom.com>  
**Sent:** Friday, November 22, 2024 4:15 PM  
**To:** Jennifer Tenney  
**Cc:** ssolis5@dow.com; j.martinez@sk.com; Garcia, Annette  
**Subject:** RE: REV - Working Draft Permit -- FOP O2215/Project 36422, SK Primacor Americas/Adhesives Polymer Plant

Thanks Jennifer – We will review the WDP and responses and provide comments back to you by December 6<sup>th</sup>.

Thank you,

**Ellen A. Sparks**

Air Quality Specialist, Air Quality & Compliance Practice  
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**From:** Jennifer Tenney <Jennifer.Tenney@tceq.texas.gov>  
**Sent:** Friday, November 22, 2024 5:08 PM  
**To:** Sparks, Ellen <Ellen.Sparks@aecom.com>  
**Cc:** ssolis5@dow.com; j.martinez@sk.com; Garcia, Annette <annette.garcia@aecom.com>  
**Subject:** REV - Working Draft Permit -- FOP O2215/Project 36422, SK Primacor Americas/Adhesives Polymer Plant

Ellen,

I have reviewed your WDP comments and prepared the attached revised WDP. The other attachment has my responses to your comments explaining what changes have been made. A few of the items have questions for you. Please review the revised WDP and submit any comments you have on by **December 6, 2024**. Since this is a follow-up review to the previously submitted and reviewed WDP, only comments concerning changes since the last WDP may be considered by

**From:** Sparks, Ellen <Ellen.Sparks@aecom.com>  
**Sent:** Friday, June 14, 2024 3:39 PM  
**To:** Jennifer Tenney  
**Cc:** Solis, Sherrie (S); MartinezJacob(Jacob Martinez)/Operations; Garcia, Annette  
**Subject:** RE: Working Draft Permit -- FOP 02215/Project 36422, SK Primacor Americas/Adhesives Polymer Plant  
**Attachments:** 02215 T5 WDP Response\_June 14, 2024.pdf; Form OP-PBRSUP.docx; Form OP-REQ3.docx; Form OP-SUMR.docx

Hi Jennifer,

Responding to your email on behalf of SK, please see attached for a response to the working draft permit, with associated forms updated as a part of the response.

Please reach out with any questions.

Thank you!

**Ellen A. Sparks**

Air Quality Specialist, Air Quality & Compliance Practice  
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**From:** Jennifer Tenney <[Jennifer.Tenney@tceq.texas.gov](mailto:Jennifer.Tenney@tceq.texas.gov)>  
**Sent:** Friday, May 17, 2024 4:50 PM  
**To:** Chaney Phillips/SK Primacor Americas/SKGC <[c.phillips@skgeocentric.com](mailto:c.phillips@skgeocentric.com)>  
**Subject:** Working Draft Permit -- FOP 02215/Project 36422, SK Primacor Americas/Adhesives Polymer Plant

Good Afternoon,

I have conducted a technical review of the renewal application for SK Primacor Americas, Adhesives Polymer Plant. An electronic copy of the Working Draft Permit (WDP) is attached for your review. This WDP contains the TCEQ determination of applicable

## SK Primacor Americas O2215 WDP Response

SK is responding to the WDP Comments, received from TCEQ on May 17, 2024.

<b>1. TCEQ Comment</b>	<p>A Change of Name/Ownership form will need to be submitted for PBR Registration Nos. 105203, 106311, 108295, 148427, and 142435. These were listed on the OP-PBRSUP but are still under a previous company name in our database so need to be under the current company.</p> <p><b>SK is currently preparing the ownership transfer forms for the PBRs listed above. They were inadvertently missed during the initial company split, however the equipment that they authorize is owned by SK, and therefore SK is requesting that they remain listed in O2215.</b></p>
<b>2. TCEQ Comment</b>	<p>OP-PBRSUP – Table A – Registration date needs to be changed to the date the registration number was issued (not the PBR version date).</p> <p><b>Please see attached for the revised Form OP-PBRSUP with corrected registration dates.</b></p>
<b>3. TCEQ Comment</b>	<p>OP-PBRSUP – Table A – B77APPAV – cannot have an “Unknown” Registration No. as this table is for registered permits so there needs to be a registration number.</p> <p><b>SK has added the PBR registration number for this unit ID, however, as is the case with the answer to question 1 above, the registration is under Dow’s ownership and will need to be transferred to SK. The applicable forms will be submitted.</b></p>
<b>4. TCEQ Comment</b>	<p>OP-SUMR – Registration numbers need to be added to the units being authorized by PBRs. Please see OP-SUMR instructions for format.</p> <p><b>Please see attached for the revised Form OP-SUMR with added registration numbers.</b></p>
<b>5. TCEQ Comment</b>	<p>OP-CRO1 – The initial application was signed/submitted in STEERS by a person who was not the responsible official (RO). Therefore, we still need a valid certification for that application. When you submit an OP-CRO1 to certify all your application updates, responses, and WDP comments, we will just need to ensure that it includes the date of 02/14/2024. If you’d liked to wait until we resolve any comments/issues before submitting that, that is acceptable.</p> <p><b>SK is requesting to wait until all comments / issues have been resolved to submit the OP-CRO1 and will include the date of 02/14/2024 on the form when it is signed and submitted by the RO.</b></p>
<b>6. TCEQ Comment</b>	<p>Alternative Means of Control (AMOC) –The letter in the application seems to be a letter denying the alternative request. If that is all you have, then you do not have an approved alternative and you should update the relevant OP-REQ1 question to “No”. Is there a different alternative approval letter you would like to include?</p> <p><b>The AMOC letter that was included as a part of the application references the denial of Method 22 testing on the flare, however it does include that the use of the flowmeter and gas chromatograph installed on the flare qualify in lieu of having to perform a stack test. For this reason, SK is requesting to keep the letter as a part of the permit to show compliance with stack testing requirements through the use of the installed equipment referenced in the letter. SK understands that the equipment does not show compliance with the flare being “smokeless”, therefore, the need to conduct Method 22 is still a requirement and was not waived with the letter. SK performed the Method 22 request on March 11, 2008.</b></p>

**Additional Comments from SK:**

<b>1. SK Comment</b>	SK is requesting to update the citations associated with Unit IDs B78APF1 and PROAPP in the current permit based on the updates to 40 CFR Part 63, Subpart FFFF that went into place on August 12, 2023. Please see attached form OP-REQ3 for more information.
<b>2. SK Comment</b>	Per Revision No. 2 in Form OP-2, SK requested to remove the NSPS DDD and VV permit shields from two sources, B77APFU1 and B78APFU1. Please remove these permit shields from the working draft permit.
<b>3. SK Comment</b>	Please remove the duplicate permit shield entries for 40 CFR Part 60, Subpart Kb and 40 CFR Part 61, Subpart FF for unit B77APD132 from the working draft permit. The correct negative applicability reason for 60 CFR Part 61, Subpart FF should be “Does not store or contain benzene waste”.
<b>4. SK Comment</b>	Please remove the duplicate permit shield entries for 40 CFR Part 60, Subpart Kb and 40 CFR Part 61, Subpart FF for unit B78APPTT1 from the working draft permit. The correct negative applicability reason for 60 CFR Part 61, Subpart FF should be “Does not store or contain benzene waste”.
<b>5. SK Comment</b>	Please add ST&C number 1.G, relating to compliance with 30 TAC Chapter 101, Subchapter H, Division 3 (Mass Emission Cap and Trade Program), back into the permit. SK believes this requirement still applies and was inadvertently removed from the permit.
<b>6. SK Comment</b>	Please add ST&C number 19, relating to compliance with 30 TAC Chapter 117, back into the permit. SK believes this requirement still applies and was inadvertently removed from the permit.

**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.
June 14, 2024	O2215	RN110300126

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
		B77APCF401	OP-UA15	KNOCKOUT VENT		106.261/11/01/2003[105203]	
		B77APCF402	OP-UA15	KNOCKOUT VENT		106.261/11/01/2003[105203]	
	3	B77APCT1	OP-UA13	CT-1		8567 <i>106.371/09/04/2000</i>	
		B77APD108	OP-UA15	APP MATERIALS HANDLING VENT 108		8567	
		B77APD109	OP-UA15	APP MATERIALS HANDLING VENT 109		8567	
		B77APD132	OP-REQ2	PTZ-EA TOTE		106.261/11/01/2003[148427] 106.262/11/01/2003[148427]	
	3	B77APFU1	OP-UA1 OP-UA12	B-77 PROCESS FUGITIVES		8567 106.261/11/01/2003[105203, 106311, 108295, 148427] 106.262/11/01/2003[108295, 148427] 106.473/09/04/2000 <i>106.263/11/01/2003</i>	



**Texas Commission on Environmental Quality  
Federal Operating Permit Program  
Individual Unit Summary for Revisions  
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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
		B77APLR1	OP-UA4	APP LOADING RACK		8567	
		B77APLR133	OP-UA4	KEROSENE LOADING		8567 106.473/09/04/2000	
		B77APLR750	OP-UA4	D-50 WASTE CATALYST LOADING		8567	
		B77APPT10	OP-UA15	CATALYST MIX TANK		8567	
		B77APPT10A	OP-UA15	CATALYST MIX TANK		8567	
		B77APPT11	OP-UA15	CATALYST MIX TANK		8567	
		B77APPT11A	OP-UA15	CATALYST MIX TANK		8567	
		B77APPT12	OP-UA15	CATALYST MIX TANK		8567	
		B77APPT12A	OP-UA15	CATALYST MIX TANK		8567	
		B77APPVAV	OP-UA15	HRVOC ANALYZERS		106.261/11/01/2003 106.262/11/01/2003 [81988]	

**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.
June 14, 2024	O2215	RN110300126

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
		B77APRX1	OP-REQ2	APP PROCESS		8567	
		B77APSC01	OP-REQ2	DEGREASER		106.454/07/08/1998	
		B77APSC07	OP-UA16 OP-UA57	B7700 MAINTENANCE & SOLVENT CLEANING		8567	
		B77APSP101	OP-UA15	APP SPIN DRYER VENT 101		8567	
		B77APSPS1	OP-UA14	AP OIL/WATER SEPARATOR SUMP 1		8567	
		B77APSPS2	OP-UA14	AP OIL/WATER SEPARATOR SUMP 2		8567	
		B77APSPS3	OP-UA14	AP OIL/WATER SEPARATOR SUMP 3		8567	
		B77APST1	OP-UA3	KEROSENE STORAGE TANK T-1		8567	
		B77APST10	OP-UA3	AP STORAGE TANK T-10		8567	
		B77APST11	OP-UA3	AP STORAGE TANK T-11		8567	

**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.
June 14, 2024	O2215	RN110300126

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
		B77APST12	OP-UA3	AP STORAGE TANK T-12		8567	
		B77APST133	OP-UA3	KEROSENE PROCESS TANK		8567	
		B77APST750	OP-REQ2	APP CATALYST AND WASTE OIL DUMPSTER		8567	
		B77APST8	OP-UA3	AP STORAGE TANK T-8		8567	
		B77APSTT14	OP-UA3	AP STORAGE TANK T-14		8567	
		B77APSTT15	OP-UA3	AP STORAGE TANK T-15		8567	
		B77APV101	OP-UA15	APP SILO V-101, CHECK HOPPER		8567	
		B77APV102	OP-UA15	APP SILO V-102, CHECK HOPPER		8567	
		B77APWW	OP-REQ2	APP POLYETHYLENE WASTE WATER		8567	
		B77SB101	OP-UA15	APP SILO SB-101, MAKE HOPPER		8567	

**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.
June 14, 2024	O2215	RN110300126

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
		B77SB102	OP-UA15	APP SILO SB-102, MAKE HOPPER		8567	
		B77SB103	OP-UA15	APP SILO SB-103, MAKE HOPPER		8567	
		B77SB104	OP-UA15	APP SILO SB-104, MAKE HOPPER		8567	
		B77SB105	OP-UA15	APP SILO SB-105, MAKE HOPPER		8567	
		B77SB106	OP-UA15	APP SILO SB-106, MAKE HOPPER		8567	
		B77SB107	OP-UA15	APP SILO SB-107, MAKE HOPPER		8567	
		B77SPS102	OP-UA14	AP SEPARATOR		8567	
		B77SPS103	OP-UA15	AP SEPARATOR		8567	
	3	B78APF1	OP-UA7 OP-UA15	APP FLARE		8567 106.261/11/01/2003[142435] <b>106.263/11/01/2003</b>	
		B78APFU1	OP-UA1 OP-UA12	B-78 PROCESS FUGITIVES		8567 106.124/09/04/2000	

**Texas Commission on Environmental Quality  
Federal Operating Permit Program  
Individual Unit Summary for Revisions  
Form OP-SUMR  
Table 1**

Date	Permit No.	Regulated Entity No.
June 14, 2024	O2215	RN110300126

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
		B78APKO2A	OP-UA15	APP FLARE KNOCK OUT DRUM D-22		8567	
		B78APPTT1	OP-UA3	ACRYLIC ACID ISOCONTAINER		106.124/09/04/2000	
		B78APST5	OP-UA3	AP STORAGE TANK T-5		8567 106.261/11/01/2003[108295] 106.262/11/01/2003[108295]	
		PROAPP	OP-UA57 OP-UA60	APP PROCESS UNIT		8567	

TCEQ-10344 (APDG 5767v7, Revised 05/20) OP-SUMR

This form is for use by facilities subject to air quality permit requirements and may be revised periodically.

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

**Table 1a: Additions**

<b>Date:</b> June 14, 2024	<b>Regulated Entity No.:</b> RN110300126	<b>Permit No.:</b> O2215
<b>Company Name:</b> SK Primacor Americas LLC	<b>Area Name:</b> Adhesive Polymers 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)
	B78APF1	OP-UA15	63FFFF-01	HAPS	40 CFR Part 63, Subpart FFFF	63.11(b), 63.2450(b), 63.2455(a)-Table 1.1.a.ii, (a)-(b), (b)(1), <del>63.982(b)</del> , 63.983(a)(1)-(2), (d)(1), (d)(1)(i), 63.983[G](d)(2), (d)(3), <del>63.987(a), 63.997(b)(2)-(3), (e)(3)</del> , <b>63.2450(a)(2), (e)(4), (e)(5), (e)(6), (k)(8), (u), 63.2535(m)(1)-(2)</b>
	PROAPP	OP-UA60	63FFFF-01	HAPS	40 CFR Part 63, Subpart FFFF	63.2440(a), 63.2450(a), (l), <b>63.2450(a)(2), 63.2450(e)(4), 63.2450(g)(7), 63.2450(k)(8), 63.2450(t), 63.2450(u), 63.2450(v)</b>

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program**

**Table 1b: Additions**

<b>Date:</b> June 14, 2024	<b>Regulated Entity No.:</b> RN110300126	<b>Permit No.:</b> O2215
<b>Company Name:</b> SK Primacor Americas LLC	<b>Area Name:</b> Adhesive Polymers Plant	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
	B78APF1	63FFFF-01	HAPS	[G]63.115(d)(2)(v), <del>(d)(3)(iii)</del> , 63.983(b), [G](b)(1)-(3), [G](c)(1), 63.983(c)(2)-(3), (d)(1), (d)(1)(ii), <del>63.987(e)</del> , <del>63.997(b), (e)(2)-(3)</del> , <del>63.997(e)(3)(i)-(ii)</del>	63.983(b), [G](d)(2), <del>63.987(e)</del> , <del>63.998(a)(1)(ii)</del> , <del>(a)(1)(iii)(A)-(B)</del> , [G]63.998(b)(1)- <del>(3)</del> , <del>[G](b)(5)</del> , [G]63.998(d)(1), <del>(d)(3)(i)-(ii), (d)(5)</del> , <del>63.2450(f)(2), (f)(2)(i)-(ii)</del> , <del>63.2450(k)(1)(ii)</del> , <del>(k)(7)</del> , <b>63.2525(m), (n)</b>	<del>63.997(b)(2), (e)(3)</del> , <del>63.998(a)(1)(iii)(A)</del> , [G](b)(3), [G]63.999(a)(1), (b)(5), (c)(1), 63.999(c)(2)(i), <del>(e)(3)</del> , (c)(6), <del>[G]63.999(e)(6)(i), (e)(6)(iv)</del> , [G]63.999(d)(1)-(2), <del>63.2450(f)(2)(ii), (e)</del> , <b>63.2520(d)(3), (e)(11), (e)(12)</b>
	PROAPP	63FFFF-01	HAPS	63.2445(d), <b>63.2450(g)(6)</b>	63.2525, (a), [G](b), (c), <del>(f), (j)</del> , <b>63.2525(p)</b>	63.2435(d), 63.2445(c), 63.2450(g)(5), (m), (m)(1)-(2), 63.2515(a), (b)(1), (c), 63.2520(a) [G]63.2520(b)-(d), (e), (e)(1), [G]63.2520(e)(10), <del>(e)(2)-(5)</del> , <del>(e)(2)-(3), (5)</del> , 63.2520(e)(5)(i), [G]63.2520(e)(5)(ii)-(iii), 63.2520(e)(6)-(7), (e)(9), <b>(e)(14)</b>

**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
February 14, 2024	O2215	RN110300126

Unit ID No.	Registration No.	PBR No.	Registration Date
B77APFU1	105203 106311	106.261	11/21/2012 01/15/2013
B77APFU1	108295 148427	106.261 106.262	05/09/2013 10/18/2017
B77APCF401	105203	106.261	11/21/2012
B77APCF402	105203	106.261	11/21/2012
B77APD132	148427	106.261 106.262	10/18/2017
B77APPVAV	81988	106.261 106.262	06/12/2007
B78APF1	142435	106.261	10/03/2016
B78APST5	108295	106.261 106.262	05/09/2013



**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
February 14, 2024	O2215	RN110300126

Unit ID No.	PBR No.	Version No./Date
B77APCT1	106.371	09/04/2000
B78APF1 B77APFU1	106.263	11/01/2001
B77APFU1	106.473	09/04/2000
B77APLR133	106.473	09/04/2000
B77APSC01	106.454	11/01/2000
B78APFU1	106.124	09/04/2000
B78APPTT1	106.124	09/04/2000

**Permit By Rule Supplemental Table (Page 4)**  
**Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
February 14, 2024	O2215	RN110300126

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B77APFU1	106.261 106.262	105203 106311	Maintain PBR documentation
B77APFU1	106.261 106.262	108295 148427	Maintain PBR documentation
B77APCF401	106.261	105203	Maintain PBR documentation
B77APCF402	106.261	105203	Maintain PBR documentation
B77APD132	106.261 106.262	148427	Maintain PBR documentation
B77APPVAV	106.261 106.262	11/01/2003 11/01/2003	Maintain PBR documentation
B78APF1	106.261	142435	Maintain PBR documentation
B78APST5	106.261 106.262	11/01/2003 11/01/2003	Maintain PBR documentation

**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
February 14, 2024	O2215	RN110300126

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B77APCT1	106.371	09/04/2000	Circulation rate is measured, and TDS samples are taken
B78APF1 B77APFU1	106.263	11/01/2001	Track emissions on a 12-month rolling basis
B77APFU1	106.473	09/04/2000	Maintain records of type of liquid loaded/unloaded
B77APLR133	106.473	09/04/2000	Maintain records of type of liquid loaded/unloaded
B77APSC01	106.454	11/01/2000	Maintain records of the solvent TVP and drain area of the cold solvent cleaner
B78APFU1	106.124	09/04/2000	Maintain PBR documentation and track emissions
B78APPTT1	106.124	09/04/2000	Maintain PBR documentation and track emissions

TCEQ-20875 (APD-ID 102v1, revised 05/22) OP-PBRSUP  
This form for use by facilities subject to air quality permit requirements and  
may be revised periodically (Title V IMS Release 05/20)

**From:** PhillipsChaney(Chaney Phillips)/SK Primacor Americas <c.phillips@sk.com>  
**Sent:** Tuesday, May 21, 2024 7:32 AM  
**To:** Jennifer Tenney  
**Cc:** MartinezJacob(Jacob Martinez)/Operations; Solis, Sherrie (S)  
**Subject:** RE: Working Draft Permit -- FOP 02215/Project 36422, SK Primacor Americas/Adhesives Polymer Plant  
**Attachments:** 36422-O2215-WDP.docx

Hi Jennifer,

Thank you for forwarding this. I've cc'd Jacob Martinez and Sherrie Solis who'll be corresponding back to you.

**Chaney Phillips**

**Production Director**

SK Primacor Americas LLC  
2301 N. Brazosport Blvd., B-7701  
Freeport, TX 77541 USA  
Office: | Cell: (870)310-0941  
[c.phillips@skgeocentric.com](mailto:c.phillips@skgeocentric.com)



---

**From:** Jennifer Tenney <Jennifer.Tenney@tceq.texas.gov>  
**Sent:** Friday, May 17, 2024 4:50 PM  
**To:** Chaney Phillips/SK Primacor Americas/SKGC <c.phillips@skgeocentric.com>  
**Subject:** Working Draft Permit -- FOP 02215/Project 36422, SK Primacor Americas/Adhesives Polymer Plant

Good Afternoon,

I have conducted a technical review of the renewal application for SK Primacor Americas, Adhesives Polymer 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 Friday, June 14, 2024.

The following issues will also need to be address:

1. A Change of Name/Ownership form will need to be submitted for PBR Registration Nos. 105203, 106311, 108295, 148427, and 142435. These were listed on the OP-PBRSUP but are still under a previous company name in our database so need to be under the current company.

2. OP-PBRSUP – Table A – Registration date needs to be changed to the date the registration number was issued (not the PBR version date).
3. OP-PBRSUP – Table A – B77APPAV – cannot have an “Unknown” Registration No. as this table is for registered permits so there needs to be a registration number.
4. OP-SUMR – Registration numbers need to be added to the units being authorized by PBRs. Please see OP-SUMR instructions for format.
5. OP-CRO1 – The initial application was signed/submitted in STEERS by a person who was not the responsible official (RO). Therefore, we still need a valid certification for that application. When you submit an OP-CRO1 to certify all your application updates, responses, and WDP comments, we will just need to ensure that it includes the date of 02/14/2024. If you’d liked to wait until we resolve any comments/issues before submitting that, that is acceptable.
6. Alternative Means of Control (AMOC) –The letter in the application seems to be a letter denying the alternative request. If that is all you have, then you do not have an approved alternative and you should update the relevant OP-REQ1 question to “No”. Is there a different alternative approval letter you would like to include?

Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

Please review the second portion of the “SOP Technical Review Fact Sheet” located at [http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_factsheet.pdf](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](mailto: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,

Jennifer Tenney  
Environmental Permit Specialist I  
TCEQ – APD – OP Section (Title V)  
(512) 239-1830



How are we doing? Fill out our online customer satisfaction survey at [www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

**From:** Solis, Sherrie (S) <ssolis5@dow.com>  
**Sent:** Friday, April 26, 2024 4:08 PM  
**To:** Jennifer Tenney  
**Cc:** PhillipsChaney(Chaney Phillips)/SK Primacor Americas; MartinezJacob(Jacob Martinez)/Operations; Garcia, Annette  
**Subject:** RE: Technical Review -- FOP O2215/Project 36422, SK Primacor Americas LLC/Adhesive Polymers Plant  
**Attachments:** Form OP-PBRUP (Revised 4-26-2024).docx

Dear Ms. Tenney,

SK Primacor Americas LLC (SK) is submitting the following responses to your information request received on April 11, 2024, related to the renewal application of Permit No. O2215 for the Adhesive Polymers Plant (Project No. 36422).

**1) OP-1**

- a) Please confirm the physical address and the latitude/longitude are correct. Google Earth shows as different locations, and we need to know if they are both part of your site area.

*The Adhesive Polymers Plant is located at 2301 N. Brazosport Blvd., B-7701, Freeport, Brazoria County, TX 77541 (within the Dow Chemical Company plant). The facility coordinates are 28° 59' 57.93", -95° 24' 31.78".*

**2) Unit Attribute Forms**

- a) B78APPT1 – UA3, p4 (Table 4a) – The code for Storage Capacity for this unit is different on the submitted form than the previous answer in our database, but there was not an OP-2 item requesting this change. Please confirm the correct code choice for Storage Capacity.

*The correct storage capacity code for B78APPT1 is "A1K-25K". Our records indicate that this code was submitted with the 2018 renewal application (Project No. 28477).*

- b) B78APF1 - Form UA7, p5 (Table 5a) – for Alternative Monitoring and Minor Modification columns "NO" is not a valid choice. Please check the code options to select what you need.

*The correct code for the Alternative Monitoring column is "OTHER" and the code for the Minor Modification column should be "NONE".*

**3) OP-REQ2**

- a) For the following units we have made small adjustments to the negative applicability citations and reasons. For most of these, the citation provided was for the rule definition section, but ideally, we'd use the applicability citation since that would show why not meeting a particular definition gets a unit out of the rule. We did clarify in the reason that the unit is not meeting a given definition so a reader would still know to look at the definitions. Please revise the form to confirm these changes are acceptable.

- i) B77APST10, B77APST11, B77APST12, B77APST750,

(1) Citation changed from §63.2550(i) to §63.2470(a)

(2) Wording changed to: Contains HAP only as impurities so does not meet the definition of a storage tank.

- ii) B77APPT10, B77APPT10A, B77APPT11, B77APPT11A, B77APPT12, B77APPT12A, B77SB101, B77SB102, B77SB103, B77SB104, B77SB105, B77SB106, B77SB107

- (1) Citation changed from §63.2550(i) to §63.2460(a)
- (2) Wording changed to: Uncontrolled HAP emissions are less than 200 lb/yr so does not meet the definition of a batch process vent.
- iii) B77APV101, B77APV102, B77APST133
  - (1) Citation changed from §63.2550(i) to §63.2460(a)
  - (2) Wording for B77APV101 and B77APV102 changed to match B77APST133: By definition, this vent is not a regulated batch process vent because it contains less than 50 ppm of HAP.
- iv) B77APRX1
  - (1) Citation is correct.
  - (2) Reason referred to oxidation reactor which is language from a different subpart (NPS III), so removed that portion to leave “Affected facility does not produce any of the chemicals listed in 60.707.”
- v) B77APWW
  - (1) Citation changed from §115.140 to §115.142.
  - (2) Wording changed to Wastewater does not meet the definition of affected VOC wastewater streams.

*SK acknowledges and agrees with the changes to the Form OP-REQ2.*

**4) OP-PBR SUP**

- a) Table D – Rows that have “maintain PBR documentation” or “Maintain PBR documentation and track emissions” under Monitoring Requirements need to have more specific information. This column should specify what is being monitored and/or recorded for each unit. Please refer to the form instructions for details about what we are looking for.
- b) Tables B and D - B77APSC01 does not have a valid version date for 106.454. Valid dates would include 09/04/2000 or 09/01/2001. Please select which one is correct.

*Please see attached for an updated Form OP-PBR SUP addressing both changes.*

Please let us know if you need additional information.

Sincerely,

*Sherrie Solis*  
Senior Environmental Specialist  
Poly 4 / SK Primacor Americas

B-4101  
2301 N. Brazosport Blvd, Freeport, TX 77541  
phone: 979.238.1764 | cell: 979-665-6411 | email: [ssolis5@dow.com](mailto:ssolis5@dow.com)

General Business



**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
April 26, 2024	O2215	RN110300126

Unit ID No.	Registration No.	PBR No.	Registration Date
B77APFU1	105203 106311	106.261	11/01/2003
B77APFU1	108295 148427	106.261 106.262	11/01/2003
B77APCF401	105203	106.261	11/01/2003
B77APCF402	105203	106.261	11/01/2003
B77APD132	148427	106.261 106.262	11/01/2003 11/01/2003
B77APPVAV	Unknown	106.261 106.262	11/01/2003 11/01/2003
B78APF1	142435	106.261	11/01/2003
B78APST5	108295	106.261 106.262	11/01/2003 11/01/2003

**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
April 26, 2024	O2215	RN110300126

Unit ID No.	PBR No.	Version No./Date
B77APCT1	106.371	09/04/2000
B78APF1 B77APFU1	106.263	11/01/2001
B77APFU1	106.473	09/04/2000
B77APLR133	106.473	09/04/2000
B77APSC01	106.454	<del>11/01/2000</del> <b>11/01/2001</b>
B78APFU1	106.124	09/04/2000
B78APPTT1	106.124	09/04/2000

**Permit By Rule Supplemental Table (Page 4)**  
**Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
April 26, 2024	O2215	RN110300126

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B77APFU1	106.261 106.262	105203 106311	Maintain hourly and annual emission records of each chemical to demonstrate compliance with PBR limits. Monitor visible emissions to comply with 5.0% opacity in any six-minute period.
B77APFU1	106.261 106.262	108295 148427	Maintain hourly and annual emission records of each chemical to demonstrate compliance with PBR limits. Monitor visible emissions to comply with 5.0% opacity in any six-minute period.
B77APCF401	106.261	105203	Maintain hourly and annual emission records of each chemical to demonstrate compliance with PBR limits. Monitor visible emissions to comply with 5.0% opacity in any six-minute period.
B77APCF402	106.261	105203	Maintain hourly and annual emission records of each chemical to demonstrate compliance with PBR limits. Monitor visible emissions to comply with 5.0% opacity in any six-minute period.
B77APD132	106.261 106.262	148427	Maintain hourly and annual emission records of each chemical to demonstrate compliance with PBR limits. Monitor visible emissions to comply with 5.0% opacity in any six-minute period.
B77APPVAV	106.261 106.262	11/01/2003 11/01/2003	Maintain hourly and annual emission records of each chemical to demonstrate compliance with PBR limits. Monitor visible emissions to comply with 5.0% opacity in any six-minute period.
B78APF1	106.261	142435	Maintain hourly and annual emission records of each chemical to demonstrate compliance with PBR limits. Monitor visible emissions to comply with 5.0% opacity in any six-minute period.
B78APST5	106.261 106.262	11/01/2003 11/01/2003	Maintain hourly and annual emission records of each chemical to demonstrate compliance with PBR limits. Monitor visible emissions to comply with 5.0% opacity in any six-minute period.

**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
April 26, 2024	O2215	RN110300126

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B77APCT1	106.371	09/04/2000	Circulation rate is measured and total dissolved solids (TDS) samples are taken to maintain compliance with general PBR emission limits.
B78APF1 B77APFU1	106.263	11/01/2001	Track routine MSS emissions on a 24-hour basis and on a 12-month rolling basis. Maintain sufficient records of activities to demonstrate compliance for at least 5 years.
B77APFU1	106.473	09/04/2000	Maintain records of type of liquid loaded/unloaded, true vapor pressure, and uncontrolled emissions.
B77APLR133	106.473	09/04/2000	Maintain records of type of liquid loaded/unloaded, true vapor pressure, and uncontrolled emissions.
B77APSC01	106.454	<del>11/01/2000</del> 11/01/2001	Maintain records of the solvent true vapor pressure, total solvent makeup, and drain area of the cold solvent cleaner.
B78APFU1	106.124	09/04/2000	Record dates of operation to comply with five-year limit on pilot plant activity and track hourly and annual emissions.
B78APPTT1	106.124	09/04/2000	Record dates of operation to comply with five-year limit on pilot plant activity and track hourly and annual emissions.

TCEQ-20875 (APD-ID 102v1, revised 05/22) OP-PBRSUP  
This form for use by facilities subject to air quality permit requirements and  
may be revised periodically (Title V IMS Release 05/20)

---

**From:** Jennifer Tenney <[Jennifer.Tenney@tceq.texas.gov](mailto:Jennifer.Tenney@tceq.texas.gov)>

**Sent:** Thursday, April 11, 2024 9:11 AM

**To:** Chaney Phillips/SK Primacor Americas/SKGC <[c.phillips@skgeocentric.com](mailto:c.phillips@skgeocentric.com)>

**Subject:** Technical Review -- FOP O2215/Project 36422, SK Primacor Americas LLC/Adhesive Polymers Plant

Good Morning,

Attached is a list of noted issues/deficiencies. Please provide the additional information required by Friday, April 26, 2024

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.

Thank you for your cooperation.

Sincerely,

*Jennifer Tenney*

Environmental Permit Specialist I

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

[jennifer.tenney@tceq.texas.gov](mailto:jennifer.tenney@tceq.texas.gov)

Phone: (512) 239-1830

Fax: (512) 239-1400



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**From:** Jennifer Tenney  
**Sent:** Tuesday, March 26, 2024 9:08 AM  
**To:** c.phillips@sk.com  
**Subject:** Technical Review -- FOP O2215/Project 36422, SK Primacor Americas LLC/Adhesive Polymers Plant

Good Morning,

I have been assigned to the Federal Operating Permit (FOP) initial issuance/renewal/revision application of Permit No. O2215 for SK Primacor Americas LLC, Adhesive Polymers Plant. This application has been assigned Project No. 36422. 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.

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](mailto: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](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,

*Jennifer Tenney*

Environmental Permit Specialist I  
OA/Air Permits Division/OP Section  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[jennifer.tenney@tceq.texas.gov](mailto:jennifer.tenney@tceq.texas.gov)

Phone: (512) 239-1830

Fax: (512) 239-1400



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at [www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

## Steven Piper

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**From:** eNotice TCEQ  
**Sent:** Tuesday, March 12, 2024 9:25 AM  
**To:** joan.huffman@senate.texas.gov; Ed.thompson@house.texas.gov  
**Subject:** TCEQ Notice - Permit Number O2215  
**Attachments:** TCEQ Notice - O2215\_36422.pdf

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

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

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

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



Jon Niermann, *Chairman*  
Bobby Janecka, *Commissioner*  
Catarina R. Gonzales, *Commissioner*  
Kelly Keel, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

March 12, 2024

THE HONORABLE JOAN HUFFMAN  
TEXAS SENATE  
PO BOX 12068  
AUSTIN TX 78711-2068

Re: Accepted Federal Operating Permit Renewal Application  
Project Number: 36422  
Permit Number: O2215  
SK Primacor Americas LLC  
Adhesive Polymers Plant  
Freeport, Brazoria County  
Regulated Entity Number: RN110300126  
Customer Reference Number: CN605483213

Dear Senator Huffman:

This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) renewal application for a site located in your district. As part of this permitting process, the applicant is required to publish a formal newspaper public notice. The notice will inform the public of their right to make comments or request a public hearing. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. <https://gisweb.tceq.texas.gov/LocationMapper/?marker=-95.352777,28.9825&level=13>.

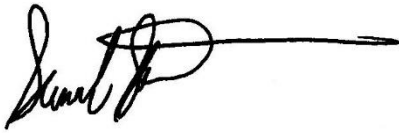
The FOP program regulates both new and existing major sources of emissions. The goal of the program is to improve air quality in Texas through increased compliance by codifying existing applicable regulatory requirements into the FOP. The FOP provides the applicant authorization to operate the equipment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

The Honorable Joan Huffman  
Page 2  
March 12, 2024

Re: Accepted Federal Operating Permit Renewal Application

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

Sincerely,

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

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

Jon Niermann, *Chairman*  
Bobby Janecka, *Commissioner*  
Catarina R. Gonzales, *Commissioner*  
Kelly Keel, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

March 12, 2024

THE HONORABLE ED THOMPSON  
TEXAS HOUSE OF REPRESENTATIVES  
PO BOX 2910  
AUSTIN TX 78768-2910

Re: Accepted Federal Operating Permit Renewal Application  
Project Number: 36422  
Permit Number: O2215  
SK Primacor Americas LLC  
Adhesive Polymers Plant  
Freeport, Brazoria County  
Regulated Entity Number: RN110300126  
Customer Reference Number: CN605483213

Dear Representative Thompson:

This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) renewal application for a site located in your district. As part of this permitting process, the applicant is required to publish a formal newspaper public notice. The notice will inform the public of their right to make comments or request a public hearing. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. <https://gisweb.tceq.texas.gov/LocationMapper/?marker=-95.352777,28.9825&level=13>.

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

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

Sincerely,

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

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

XC:

Environmental Protection Agency,  
Region VI Administrator (**6MM-AP**)

R6AirPermitTX@epa.gov

Air Section Manager

Air Program, TCEQ, OCE/FO Region XII, 5425 Polk  
St., Ste. H, Houston, TX 77023-1452

Director

Environmental Health, Brazoria County Health  
Department, 434E. Mulberry, Angleton, TX 77515-  
4736

Email

Sherrie Solis

ssolis5@dow.com

February 14, 2024

Texas Commission on Environmental Quality  
Air Permits Initial Review Team (APIRT), MC-161  
P.O. Box 13087  
Austin, TX 78711-3087

RECEIVED

FEB 14 2024

TCEQ MAIL CENTER  
BC

Hand Delivery

RE: SK Primacor Americas LLC CN605483213  
SK Primacor Americas – Freeport RN110300126  
Adhesive Polymers Plant – Site Operating Permit O2215 Renewal Application

To Whom It May Concern:

In accordance with the provisions of 30 TAC §122.241, SK Primacor Americas LLC is submitting the enclosed renewal application for the Adhesive Polymers Plant (APP) Title V Permit O2215. The following forms are included in this submittal:

- Form OP-CRO1
- Form OP-1
- Form OP-2
- Form OP-SUMR
- Form OP-UAs
- Form OP-REQ1
- Form OP-REQ2
- Form OP-REQ3
- Form OP-ACPS

For future correspondence regarding this permit application, please contact me at 870-310-0941 or via email at [c.phillips@sk.com](mailto:c.phillips@sk.com).

Sincerely,



Chaney Phillips  
Freeport and US Operations Manufacturing Site Leader

**SK Primacor Americas LLC**

**Adhesive Polymers Plant**

**Site Operating Permit O2215 Renewal Application**

**February 14, 2024**

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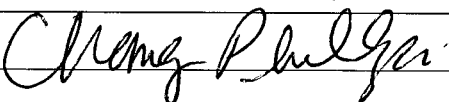
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# Section 1 - Administrative Forms



**Form OP-CRO1**  
**Certification by Responsible Official**  
**Federal Operating Permit Program**

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

<b>I. IDENTIFYING INFORMATION</b>			
RN: RN110300126		CN: CN605483213	
Account No.: BLA059G			
Permit No.: O2215		Project No.: TBA	
Area Name: Adhesive Polymers Plant		Company Name: SK Primacor Americas LLC	
<b>II. CERTIFICATION TYPE</b> <i>(Please mark the appropriate box)</i>			
<input checked="" type="checkbox"/> Responsible Official:		<input type="checkbox"/> Duly Authorized Representative:	
<b>III. SUBMITTAL TYPE</b> <i>(Please mark the appropriate box) (Only one response can be accepted per form)</i>			
<input type="checkbox"/> SOP/TOP Initial Permit Application		<input type="checkbox"/> Update to Permit Application	
<input type="checkbox"/> GOP Initial Permit Application		<input checked="" type="checkbox"/> Permit Revision, Renewal, or Reopening	
<input type="checkbox"/> Other: _____			
<b>IV. CERTIFICATION OF TRUTH</b>			
<b>This certification does not extend to information which is designated by the TCEQ as information for reference only.</b>			
I, <u>Chaney Phillips</u> , certify that I am the <u>RO</u> for this application <i>(Certifier Name printed or typed)</i> <span style="float: right;"><i>(RO or DAR)</i></span>			
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:			
<i>Note: Enter EITHER a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>			
Time Period: From _____ to _____ <span style="margin-left: 100px;"><i>Start Date*</i></span> <span style="margin-left: 150px;"><i>End Date*</i></span>			
Specific Dates <u>February 14, 2024</u> _____    _____    _____    _____    _____    _____ <span style="margin-left: 40px;"><i>Date 1</i></span> <span style="margin-left: 40px;"><i>Date 2</i></span> <span style="margin-left: 40px;"><i>Date 3</i></span> <span style="margin-left: 40px;"><i>Date 4</i></span> <span style="margin-left: 40px;"><i>Date 5</i></span> <span style="margin-left: 40px;"><i>Date 6</i></span> <span style="margin-left: 40px;"><i>Date 7</i></span> <span style="margin-left: 40px;"><i>Date 8</i></span>			
Signature: <u></u>		Signature Date: <u>2/13/2024</u>	
Title: <u>Freeport and US Operations Manufacturing Site Leader</u>			

TCEQ-10009 (APDG 5836v6, Revised 08/18) OP-CRO1

This form is for use by facilities subject to air quality permit requirements and may be revised periodically. (Title V Release 02/17)

**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.

<b>I. Company Identifying Information</b>	
<b>A.</b>	Company Name: SK Primacor Americas LLC
<b>B.</b>	Customer Reference Number (CN): CN605483213
<b>C.</b>	Submittal Date ( <i>mm/dd/yyyy</i> ): February 14, 2024
<b>II. Site Information</b>	
<b>A.</b>	Site Name: Adhesives Polymer Plant
<b>B.</b>	Regulated Entity Reference Number (RN): RN110300126
<b>C.</b>	Indicate affected state(s) required to review permit application: ( <i>Check the appropriate box[es].</i> )
<input type="checkbox"/> AR	<input type="checkbox"/> CO <input type="checkbox"/> KS <input type="checkbox"/> LA <input type="checkbox"/> NM <input type="checkbox"/> OK <input checked="" type="checkbox"/> N/A
<b>D.</b>	Indicate all pollutants for which the site is a major source based on the site's potential to emit: ( <i>Check the appropriate box[es].</i> )
<input checked="" type="checkbox"/> VOC	<input checked="" type="checkbox"/> NO <sub>x</sub> <input checked="" type="checkbox"/> SO <sub>2</sub> <input checked="" type="checkbox"/> PM <sub>10</sub> <input checked="" type="checkbox"/> CO <input type="checkbox"/> Pb <input checked="" type="checkbox"/> HAPS
Other:	
<b>E.</b>	Is the site a non-major source subject to the Federal Operating Permit Program? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>F.</b>	Is the site within a local program area jurisdiction? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
<b>G.</b>	Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>H.</b>	Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:
<b>III. Permit Type</b>	
<b>A.</b>	Type of Permit Requested: ( <i>Select only one response</i> )
<input checked="" type="checkbox"/> Site Operating Permit (SOP)	<input type="checkbox"/> Temporary Operating Permit (TOP) <input type="checkbox"/> General Operating Permit (GOP)

**Federal Operating Permit Program  
Site Information Summary  
Form OP-1 (Page 2)  
Texas Commission on Environmental Quality**

<b>IV. Initial Application Information</b> <i>(Complete for Initial Issuance Applications Only.)</i>
<b>A.</b> Is this submittal an abbreviated or a full application? <span style="float: right;"><input type="checkbox"/> Abbreviated <input type="checkbox"/> Full</span>
<b>B.</b> If this is a full application, is the submittal a follow-up to an abbreviated application? <span style="float: right;"><input type="checkbox"/> YES <input type="checkbox"/> NO</span>
<b>C.</b> If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit? <span style="float: right;"><input type="checkbox"/> YES <input type="checkbox"/> NO</span>
<b>D.</b> Has an electronic copy of this application been submitted (or is being submitted) to EPA? (Refer to the form instructions for additional information.) <span style="float: right;"><input type="checkbox"/> YES <input type="checkbox"/> NO</span>
<b>E.</b> Has the required Public Involvement Plan been included with this application? <span style="float: right;"><input type="checkbox"/> YES <input type="checkbox"/> NO</span>
<b>V. Confidential Information</b>
<b>A.</b> Is confidential information submitted in conjunction with this application? <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
<b>VI. Responsible Official (RO) Identifying Information</b>
RO Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
RO Full Name: Chaney Phillips
RO Title: Freeport and US Operations Manufacturing Site Leader
Employer Name: SK Primacor Americas LLC
Mailing Address: 2301 North Brazosport Blvd, B-7701
City: Freeport
State: Texas
ZIP Code: 77541
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (870) 310-0941
Fax No.:
Email: c.phillips@sk.com

**Federal Operating Permit Program  
Site Information Summary  
Form OP-1 (Page 3)  
Texas Commission on Environmental Quality**

<b>VII. Technical Contact Identifying Information</b> <i>(Complete if different from RO.)</i>
Technical Contact Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Technical Contact Full Name: Chaney Phillips
Technical Contact Title: Freeport and US Operations Manufacturing Site Leader
Employer Name: SK Primacor Americas LLC
Mailing Address: 2301 North Brazosport Blvd, B-7701
City: Freeport
State: Texas
ZIP Code: 77541
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (870) 310-0941
Fax No.:
Email: c.phillips@sk.com
<b>VIII. Reference Only Requirements</b> <i>(For reference only.)</i>
<b>A.</b> State Senator: Senator Joan Huffman, Texas State Senate District 17
<b>B.</b> State Representative: Representative Cody Vasut, Texas State House District 25
<b>C.</b> Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A</span>
<b>D.</b> Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>
<b>E.</b> Indicate the alternate language(s) in which public notice is required: <b>Spanish</b>

**Federal Operating Permit Program  
Site Information Summary  
Form OP-1 (Page 4)  
Texas Commission on Environmental Quality**

<b>IX. Off-Site Permit Request</b> <i>(Optional for applicants requesting to hold the FOP and records at an off-site location.)</i>
<b>A.</b> Office/Facility Name:
<b>B.</b> Physical Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
<b>C.</b> Physical Location:
<b>D.</b> Contact Name Prefix: ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Contact Full Name:
<b>E.</b> Telephone No.:
<b>X. Application Area Information</b>
<b>A.</b> Area Name: Adhesive Polymers Plant
<b>B.</b> Physical Address: 2301 N Brazosport Blvd, B-7701
City: Freeport
State: TX
ZIP Code: 77541
<b>C.</b> Physical Location:
<b>D.</b> Nearest City: Freeport
<b>E.</b> State: TX
<b>F.</b> ZIP Code: 77541

**Federal Operating Permit Program  
Site Information Summary  
Form OP-1 (Page 5)  
Texas Commission on Environmental Quality**

<b>X. Application Area Information (continued)</b>
<b>G.</b> Latitude (nearest second): 28° 58' 57"
<b>H.</b> Longitude (nearest second): 95° 21' 10"
<b>I.</b> Are there any emission units that were not in compliance with the applicable requirements identified in the application at the time of application submittal? <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
<b>J.</b> Indicate the estimated number of emission units in the application area: 51
<b>K.</b> Are there any emission units in the application area subject to the Acid Rain Program? <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
<b>XI. Public Notice</b> (Complete this section for SOP Applications and Acid Rain Permit Applications only.)
<b>A.</b> Name of a public place to view application and draft permit: Freeport Library
<b>B.</b> Physical Address: 410 Brazosport Blvd
City: Freeport
ZIP Code: 77541
<b>C.</b> Contact Person (Someone who will answer questions from the public during the public notice period):
Contact Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.):
Contact Person Full Name: Chaney Phillips
Contact Mailing Address: 2301 North Brazosport Blvd, B-7701
City: Freeport
State: Texas
ZIP Code: 77541
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (870) 310-0941

TCEQ 10002 (APD ID 251v1, revised 09/23) OP-1

This form is for use by sources subject to air quality permit requirements and may be revised periodically.

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

Date: February 14, 2024	
Permit No.: O2215	
Regulated Entity No.: RN110300126	
Company Name: SK Primacor Americas LLC	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>	
<b>I. Application Type</b>	
Indicate the type of application:	
<input checked="" type="checkbox"/> Renewal	
<input type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
<input type="checkbox"/> Significant Revision	
<input type="checkbox"/> Revision Requesting Prior Approval	
<input type="checkbox"/> Administrative Revision	
<input type="checkbox"/> Response to Reopening	
<b>II. Qualification Statement</b>	
For SOP Revisions Only	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
For GOP Revisions Only	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

**III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)**

Indicate all pollutants for which the site is a major source based on the site's potential to emit:  
(Check the appropriate box[es].)

☒ VOC      ☒ NO<sub>x</sub>      ☒ SO<sub>2</sub>      ☒ PM<sub>10</sub>      ☒ 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: February 14, 2024
Permit No.: O2215
Regulated Entity No.: RN110300126
Company Name: SK Primacor Americas 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	MS-A	NO	N/A	OP-REQ1	N/A	SK Primacor Americas LLC (SK) is requesting to update the Preconstruction Authorizations. Please see the attached Form OP-REQ1.  Additions have been bolded and italicized and deletions have been marked with a strikethrough.
2	MS-C	NO	B77APFU1 B78APFU1	OP-UA1 OP-UA12	N/A	SK is requesting to remove the NSPS DDD and VV permit shields from these two sources. The shield is not valid on the basis that SK is choosing to comply with MON in lieu of NSPS DDD and VV.
3	MS-A	NO	B77APCT1 B78APF1 B77APFU1	OP-SUMR	N/A	SK is requesting updates to the Preconstruction Authorizations for these existing units. Please see form OP-SUMR for more details.

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

Date: February 14, 2024
Permit No.: O2215
Regulated Entity No.: RN110300126
Company Name: SK Primacor Americas 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		
4	MS-C	NO	B77APFURCY B8DLRCY	OP-SUMR	106.261/11/01/2003 106.262/11/01/2003	These sources are no longer affiliated with this site. Please remove them from the permit.
5	ADMIN-E	NO	N/A	OP-PBR SUP	N/A	Please add Form OP-PBR SUP.

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

Date: February 14, 2024
Permit No.: O2215
Regulated Entity No.: RN110300126
Company Name: SK Primacor Americas LLC

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

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
6	MS-C	NO	N/A	OP-REQ1	N/A	Although the instructions on Form OP-REQ1-Page 12, regarding Title 30 TAC Chapter 115 Vent Gas Control (Highly Reactive Volatile Organic Compounds (HRVOC)), state that you do not need to answer questions III.N.5, III.N.6, or III.N.7 if you answer “NO” to questions III.N.3 and III.N.4., SK is choosing to answer questions 5-7 because the application area does contain pressure relief valves that are not controlled by a flare, contains at least one vent stream that has no potential to emit HRVOC, and contains vent streams from sources listed in 30 TAC 115.727(c)(3)(A)-(H). The Special Terms and Conditions (ST&C) for these three scenarios are listed in ST&Cs 5-7 of the current permit. SK requests that these three ST&Cs remain in the Title V permit.

TCEQ-10059 (APDG 5722v26, revised 03/22) OP-2

This form is for use by facilities subject to air quality permit requirements and may be revised periodically. (Title V release 03/10)

**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.
February 14, 2024	O2215	RN110300126

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
		B77APCF401	OP-UA15	KNOCKOUT VENT		106.261/11/01/2003	
		B77APCF402	OP-UA15	KNOCKOUT VENT		106.261/11/01/2003	
	3	B77APCT1	OP-UA13	CT-1		8567 <b>106.371/09/04/2000</b>	
		B77APD108	OP-UA15	APP MATERIALS HANDLING VENT 108		8567	
		B77APD109	OP-UA15	APP MATERIALS HANDLING VENT 109		8567	
		B77APD132	OP-REQ2	PTZ-EA TOTE		106.261/11/01/2003 106.262/11/01/2003	
	3	B77APFU1	OP-UA1 OP-UA12	B-77 PROCESS FUGITIVES		8567 106.261/11/01/2003 106.262/11/01/2003 106.473/09/04/2000 <b>106.263/11/01/2003</b>	

**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.
February 14, 2024	O2215	RN110300126

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
		B77APLR1	OP-UA4	APP LOADING RACK		8567	
		B77APLR133	OP-UA4	KEROSENE LOADING		8567 106.473/09/04/2000	
		B77APLR750	OP-UA4	D-50 WASTE CATALYST LOADING		8567	
		B77APPT10	OP-UA15	CATALYST MIX TANK		8567	
		B77APPT10A	OP-UA15	CATALYST MIX TANK		8567	
		B77APPT11	OP-UA15	CATALYST MIX TANK		8567	
		B77APPT11A	OP-UA15	CATALYST MIX TANK		8567	
		B77APPT12	OP-UA15	CATALYST MIX TANK		8567	
		B77APPT12A	OP-UA15	CATALYST MIX TANK		8567	
		B77APPVAV	OP-UA15	HRVOC ANALYZERS		106.261/11/01/2003 106.262/11/01/2003	

**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.
February 14, 2024	O2215	RN110300126

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
		B77APRX1	OP-REQ2	APP PROCESS		8567	
		B77APSC01	OP-REQ2	DEGREASER		106.454/07/08/1998	
		B77APSC07	OP-UA16 OP-UA57	B7700 MAINTENANCE & SOLVENT CLEANING		8567	
		B77APSP101	OP-UA15	APP SPIN DRYER VENT 101		8567	
		B77APSPS1	OP-UA14	AP OIL/WATER SEPARATOR SUMP 1		8567	
		B77APSPS2	OP-UA14	AP OIL/WATER SEPARATOR SUMP 2		8567	
		B77APSPS3	OP-UA14	AP OIL/WATER SEPARATOR SUMP 3		8567	
		B77APST1	OP-UA3	KEROSENE STORAGE TANK T-1		8567	
		B77APST10	OP-UA3	AP STORAGE TANK T-10		8567	
		B77APST11	OP-UA3	AP STORAGE TANK T-11		8567	

**Texas Commission on Environmental Quality  
Federal Operating Permit Program  
Individual Unit Summary for Revisions  
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Table 1**

Date	Permit No.	Regulated Entity No.
February 14, 2024	O2215	RN110300126

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
		B77APST12	OP-UA3	AP STORAGE TANK T-12		8567	
		B77APST133	OP-UA3	KEROSENE PROCESS TANK		8567	
		B77APST750	OP-REQ2	APP CATALYST AND WASTE OIL DUMPSTER		8567	
		B77APST8	OP-UA3	AP STORAGE TANK T-8		8567	
		B77APSTT14	OP-UA3	AP STORAGE TANK T-14		8567	
		B77APSTT15	OP-UA3	AP STORAGE TANK T-15		8567	
		B77APV101	OP-UA15	APP SILO V-101, CHECK HOPPER		8567	
		B77APV102	OP-UA15	APP SILO V-102, CHECK HOPPER		8567	
		B77APWW	OP-REQ2	APP POLYETHYLENE WASTE WATER		8567	
		B77SB101	OP-UA15	APP SILO SB-101, MAKE HOPPER		8567	

**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.
February 14, 2024	O2215	RN110300126

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
		B77SB102	OP-UA15	APP SILO SB-102, MAKE HOPPER		8567	
		B77SB103	OP-UA15	APP SILO SB-103, MAKE HOPPER		8567	
		B77SB104	OP-UA15	APP SILO SB-104, MAKE HOPPER		8567	
		B77SB105	OP-UA15	APP SILO SB-105, MAKE HOPPER		8567	
		B77SB106	OP-UA15	APP SILO SB-106, MAKE HOPPER		8567	
		B77SB107	OP-UA15	APP SILO SB-107, MAKE HOPPER		8567	
		B77SPS102	OP-UA14	AP SEPARATOR		8567	
		B77SPS103	OP-UA15	AP SEPARATOR		8567	
	3	B78APF1	OP-UA7 OP-UA15	APP FLARE		8567 106.261/11/01/2003 <b>106.263/11/01/2003</b>	
		B78APFU1	OP-UA1 OP-UA12	B-78 PROCESS FUGITIVES		8567 106.124/09/04/2000	



**Texas Commission on Environmental Quality  
Federal Operating Permit Program  
Individual Unit Summary for Revisions  
Form OP-SUMR  
Table 1**

Date	Permit No.	Regulated Entity No.
February 14, 2024	O2215	RN110300126

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
		B78APKO2A	OP-UA15	APP FLARE KNOCK OUT DRUM D- 22		8567	
		B78APPTT1	OP-UA3	ACRYLIC ACID ISOCONTAINER		106.124/09/04/2000	
		B78APST5	OP-UA3	AP STORAGE TANK T-5		8567 106.261/11/01/2003 106.262/11/01/2003	
		PROAPP	OP-UA57 OP-UA60	APP PROCESS UNIT		8567	

TCEQ-10344 (APDG 5767v7, Revised 05/20) OP-SUMR

This form is for use by facilities subject to air quality permit requirements and may be revised periodically.

## **Section 2 – Unit Attribute Forms**

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

Date:	February 14, 2024
Permit No.:	O2215
Regulated Entity No.:	RN110300126

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
B77APFU1	63FFFF-01	EP				Process fugitives subject to 40 CFR Part 63, Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing (MON)
B78APFU1	63FFFF-01	EP				Process fugitives subject to 40 CFR Part 63, Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing (MON)

TCEQ 10044 (APDG 5756v2 Revised 06/14) OP-UA1

This form for use by facilities subject to air quality permit requirements and may be revised periodically. (Title V Release 10/98)

**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.
February 14, 2024	O2215	RN110300126

Unit ID No.	SOP/GOP Index No.	Alternate Control Requirement	ACR ID No.	Product Stored	Storage Capacity	Throughput	Potential to Emit	Uncontrolled Emissions
B77APST1	R5112-01	NO		VOC1	A1K-25K			
B77APST10	R5112-01	NO		VOC1	A40K+			
B77APST11	R5112-01	NO		VOC1	A25K-40K			
B77APST12	R5112-01	NO		VOC1	A1K-25K			
B77APST8	R5112-01	NO		VOC1	A40K+			
B77APSTT14	R5112-01	NO		VOC1	A1K-25K			
B77APSTT15	R5112-01	NO		VOC1	A1K-25K			
B78APPTT1	R5112-01	NO		VOC1	A1K-25K			
B78APST5	R5112-01	NO		VOC1	A40K+			

**Storage Tank/Vessel Attributes**  
**Form OP-UA3 (Page 5)**  
**Federal Operating Permit Program**  
**Table 4b: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)**  
**Subchapter B: Storage of Volatile Organic Compounds (VOCs)**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
February 14, 2024	O2215	RN110300126

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.
B77APST1	R5112-01		NONE1	1-				
B77APST10	R5112-01		NONE1	1-1.5				
B77APST11	R5112-01		NONE1	1-1.5				
B77APST12	R5112-01		NONE1	1-1.5				
B77APST8	R5112-01		NONE1	1-				
B77APSTT14	R5112-01		NONE1	1-				
B77APSTT15	R5112-01		NONE1	1-				
B78APPTT1	R5112-01		VRS1	1.5+A			FLARE	B78APF1
B78APST5	R5112-01		NONE1	1-				

TCEQ - 10008 (APD-ID37v5, Revised 07/23) OP-UA3

This form is for use by facilities subject to air quality permit requirements and may be revised periodically. (Title V Release 07/23)

**Loading/Unloading Operations Attributes**  
**Form OP-UA4 (Page 1)**  
**Federal Operating Permit Program**  
**Table 1a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)**  
**Subchapter C: Loading and Unloading of Volatile Organic Compounds**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
February 14, 2024	O2215	RN110300126

Unit ID No.	SOP/GOP Index No.	Chapter 115 Facility Type	Alternate Control Requirement (ACR)	ACR ID No.	Product Transferred	Transfer Type	True Vapor Pressure	Daily Through-put	Control Options
B77APLR1	R5211-01	OTHER	213B		VOC1	LOAD	0.5-11S	NCE2	CON
B77APLR133	R5211-01	OTHER	NONE		VOC1	UNLOAD	0.5-		
B77APLR750	R5211-01	OTHER	NONE		VOC1	LOAD	0.5-		

**Loading/Unloading Operations Attributes**  
**Form OP-UA4 (Page 2)**  
**Federal Operating Permit Program**  
**Table 1b: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)**  
**Subchapter C: Loading and Unloading of Volatile Organic Compounds**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
February 14, 2024	O2215	RN110300126

Unit ID No.	SOP Index No.	Chapter 115 Control Device Type	Chapter 115 Control Device ID No.	Vapor-Tight	Vapor Space Holding Tank	Marine Terminal Exemptions	VOC Flash Point	Uncontrolled VOC Emissions
B77APLR1	R5211-01	NONE		YES				

TCEQ-10041 (APD-ID38v9, Revised 07/23) OP-UA4

This form is for use by facilities subject to air quality permit requirements and may be revised periodically. (Title V Release 07/23)

**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.
February 14, 2024	O2215	RN110300126

Unit ID No.	SOP/GOP Index No.	Acid Gases Only	Emergency/Upset Conditions Only	Alternate Opacity Limitation (AOL)	AOL ID No.	Construction Date
B78APF1	R1111-01	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.
February 14, 2024	O2215	RN110300126

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
B78APF1	60A-01	YES	YES	STEAM	60-400	1000-

**Texas Commission on Environmental Quality**

**Flare Attributes**

**Form OP-UA7 (Page 4)**

**Federal Operating Permit Program**

**Table 4: Title 40 Code of Federal Regulations Part 63**

**Subpart A: General Provisions of National Emission Standards for Hazardous Air Pollutants for Source Categories**

<b>Date</b>	<b>Permit No.</b>	<b>Regulated Entity No.</b>
February 14, 2024	O2215	RN110300126

<b>Unit ID No.</b>	<b>SOP/GOP Index No.</b>	<b>Required Under 40 CFR Part 63</b>	<b>Heat Content Specification</b>	<b>Flare Assist Type</b>	<b>Flare Exit Velocity</b>	<b>Heating Value of Gas</b>
B78APF1	63A-01	YES	YES	STEAM	60-400	1000-

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

Date	Permit No.	Regulated Entity No.
February 14, 2024	O2215	RN110300126

Unit ID No.	SOP Index No.	Out of Service	Total Gas Stream	Gas Stream Concentration	Exempt Date	Alternative Monitoring (AM)	AM ID No.	Minor Modification	Minor Modification ID No.	Flare Type
B78APF1	R5720-01	NO	YES	YES		NO		NO		OTHER

**Texas Commission on Environmental Quality**  
**Flare Attributes**  
**Form OP-UA7 (Page 6)**  
**Federal Operating Permit Program**  
**Table 5b: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)**  
**Subchapter H, Division 1: Highly-Reactive Volatile Organic Compounds-Vent Gas Control**

Date	Permit No.	Regulated Entity No.
February 14, 2024	O2215	RN110300126

Unit ID No.	SOP Index No.	Monitoring Requirements	§115.725(e) Requirements	Multi-Purpose Usage	Flow Rate	Physical Seal	Monitoring Option	§115.725(h)(4) Alternative	Tank Service
B78APF1	R5720-01								NO

TCEQ - 10022 (APDG 5070v12, Revised 11/21) OP-UA7  
This form is for use by facilities subject to air quality permit requirements and may be revised periodically. (Title V Release 11/21)

**Fugitive Emission Unit Attributes  
Form OP-UA12 (Page 11)**

**Federal Operating Permit Program**

**Table 2a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)**

**Subchapter D: Fugitive Emission Control in Petroleum Refining, Natural Gas/Gasoline Processing, and Petrochemical Processes in Ozone  
Nonattainment Areas**

**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
February 14, 2024	O2215	RN110300126

Unit ID No.	SOP/GOP Index No.	Title 30 TAC § 115.352 Applicable	< 250 Components at Site	Weight Percent VOC	Reciprocating Compressors or Positive Displacement Pumps
B77APFU1	R5352-ALL				
B78APFU1	R5352-ALL				

**Fugitive Emission Unit Attributes**  
**Form OP-UA12 (Page 138)**  
**Federal Operating Permit Program**  
**Table 16a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)**  
**Subchapter H: Fugitive Emissions (HRVOC)**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
February 14, 2024	O2215	RN110300126

Unit ID No.	SOP/GOP Index No.	Title 30 TAC § 115.780 Applicable	Less Than 250 Components at Site	Weight Percent HRVOC	Title 30 TAC Chapter 115 Fugitive Unit Components		
					Pumps with Shaft Seal System	Compressors with Shaft Seal System	Agitators with Shaft Seal System
B77APFU1	R5780-ALL						
B78APFU1	R5780-ALL						

TCEQ-10045 (APD-ID 27v5.0, Revised 07/23) OP-UA12

This form is for use by facilities subject to air quality permit requirements and may be revised periodically. (Title V Release 07/23)

**Texas Commission on Environmental Quality  
Cooling Tower Attributes  
Form OP-UA13 (Page 3)**

**Federal Operating Permit Program  
Table 3a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)  
Subchapter H, Division 2: Cooling Tower Heat Exchange Systems**

Date	Permit No.	Regulated Entity No.
February 14, 2024	O2215	RN110300126

Unit ID No.	SOP Index No.	Cooling Tower Heat Exchange Systems Exemptions	Alternative Monitoring	Modified Monitoring	Approved Monitoring ID No.
B77APCT1	R5760-01	NONE	NO	NO	

**Texas Commission on Environmental Quality  
Cooling Tower Attributes  
Form OP-UA13 (Page 4)**

**Federal Operating Permit Program**

**Table 3b: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)  
Subchapter H, Division 2: Cooling Tower Heat Exchange Systems**

Date	Permit No.	Regulated Entity No.
February 14, 2024	O2215	RN110300126

Unit ID No.	SOP Index No.	Jacketed Reactor	Design Capacity	Finite Volume System	Flow Monitoring/ Testing Method	Total Strippable VOC	On-Line Monitor
B77APCT1	R5760-01	NO	8000+	NO	INLET	NO	YES

TCEQ 10029 (APDG 5786v13, Revised 11/21) OP-UA13

This form is for use by facilities subject to air quality permit requirements and may be revised periodically. (Title V Release 11/21)



**Water Separator Attributes  
Form OP-UA14 (Page 1)**

**Federal Operating Permit Program**

**Table 1: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115) Water Separation  
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
February 14, 2024	O2215	RN110300126

Unit ID No.	SOP/GOP Index No.	Alternate Control Requirement (ACR)	ACR ID No.	Exemption	Emission Control Option	Control Device	Control Device ID No.
B77APSPS1	R5131-01	NO		ATVP			
B77APSPS2	R5131-01	NO		ATVP			
B77APSPS3	R5131-01	NO		ATVP			
B77SPS102	R5131-01	NO		ATVP			

TCEQ-10038 (APD-ID 49v2, Revised 11/22) OP-UA14

This form is for use by facilities subject to air quality permit requirements and may be revised periodically. (Title V Release 11/22)

**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.
February 14, 2024	O2215	RN110300126

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
B77APCF401	R5121-01	NO	NO	EXLDPE				
B77APCF402	R5121-01	NO	NO	EXLDPE				
B77APD108	R5121-01	NO	NO	EXLDPE				
B77APD109	R5121-01	NO	NO	EXLDPE				
B77APPT10	R5121-01	NO	NO	REGVAPPL		100-		YES
B77APPT10A	R5121-01	NO	NO	REGVAPPL		100-		YES
B77APPT11	R5121-01	NO	NO	REGVAPPL		100-		YES
B77APPT11A	R5121-01	NO	NO	REGVAPPL		100-		YES
B77APPT12	R5121-01	NO	NO	REGVAPPL		100-		YES
B77APPT12A	R5121-01	NO	NO	REGVAPPL		100-		YES

**Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes  
Form OP-UA15 (Page 3)**

**Federal Operating Permit Program**

**Table 2a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)**

**Subchapter B: Vent Gas Control**

**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
February 14, 2024	O2215	RN110300126

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
B77APSP101	R5121-01	NO	NO	EXLDPE				
B77APST133	R5121-01	NO	NO	REGVAPPL		100-		YES
B77APV101	R5121-01	NO	NO	EXLDPE				
B77APV102	R5121-01	NO	NO	EXLDPE				
B77SB101	R5121-01	NO	NO	EXLDPE				
B77SB102	R5121-01	NO	NO	EXLDPE				
B77SB103	R5121-01	NO	NO	EXLDPE				
B77SB104	R5121-01	NO	NO	EXLDPE				
B77SB105	R5121-01	NO	NO	EXLDPE				

**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.
February 14, 2024	O2215	RN110300126

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
B77SB106	R5121-01	NO	NO	EXLDPE				
B77SB107	R5121-01	NO	NO	EXLDPE				
B77SPS103	R5121-01	NO	NO	REGVAPPL				
B78APKO2A	R5121-01	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.
February 14, 2024	O2215	RN110300126

Emission Point ID No.	SOP Index No.	Alternate Control Requirement	ACR ID No.	Control Device Type	Control Device ID No.
B77SPS103	R5121-01	NONE		FLARE	B78APF1
B78APKO2A	R5121-01	NONE		FLARE	B78APF1

**Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes  
Form OP-UA15 (Page 30)**

**Federal Operating Permit Program**

**Table 12a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)  
Subchapter H, Division 1: Highly-Reactive Volatile Organic Compounds-Vent Gas Control  
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
February 14, 2024	02215	RN110300126

Emission Point ID No.	SOP Index No.	HRVOC Concentration	Max Flow Rate	Exempt Date	Vent Gas Stream Control
B77APPVAV	R5720-01	NO	YES	NO	
B77APSP101	R5720-01	YES	NO	NO	
B77APV101	R5720-01	YES	NO	NO	
B77APV102	R5720-01	YES	NO	NO	
B77SB101	R5720-01	YES	NO	NO	
B77SB102	R5720-01	YES	NO	NO	
B77SB103	R5720-01	YES	NO	NO	
B77SB104	R5720-01	YES	NO	NO	
B77SB105	R5720-01	YES	NO	NO	
B77SB106	R5720-01	YES	NO	NO	
B77SB107	R5720-01	YES	NO	NO	

**Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes  
Form OP-UA15 (Page 30)**

**Federal Operating Permit Program**

**Table 12a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)  
Subchapter H, Division 1: Highly-Reactive Volatile Organic Compounds-Vent Gas Control  
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
February 14, 2024	02215	RN110300126

Emission Point ID No.	SOP Index No.	HRVOC Concentration	Max Flow Rate	Exempt Date	Vent Gas Stream Control
B78APKO2A	R5720-01	NO	NO		FLARE

**Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes  
Form OP-UA15 (Page 32)**

**Federal Operating Permit Program**

**Table 13a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)  
Subpart FFFF: National Emission Standards for Hazardous Air Pollutants:  
Miscellaneous Organic Chemical Manufacturing - Continuous Process Vents  
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
February 14, 2024	O2215	RN110300126

Emission Point ID No.	SOP Index No.	Emission Standard	Comb Device	95% Scrubber	PERF Test	Negative Pressure	Bypass Line
B78APF1	63FFFF-01	BLWFLR					



**Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes  
Form OP-UA15 (Page 35)**

**Federal Operating Permit Program**

**Table 13d: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)  
Subpart FFFF: National Emission Standards for Hazardous Air Pollutants:  
Miscellaneous Organic Chemical Manufacturing - Continuous Process Vents  
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
February 14, 2024	O2215	RN110300126

Emission Point ID No.	SOP Index No.	Designated GRP1	Designated HAL	Determined HAL	Prior Eval	Assessment Waiver	Assessment Waiver ID	Negative Pressure	Bypass Line
B78APF1	63FFFF-01	YES	NO	YES	NO	YES	01/23/2008	NO	NONE

TCEQ - 10046 (APDG 5168v47, Revised 11/22) OP-UA15

This form is for use by facilities subject to air quality permit requirements and may be revised periodically. (Title V Release 11/22)

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

Date	Permit No.	Regulated Entity No.
February 14, 2024	O2215	RN110300126

Unit ID No.	SOP/GOP Index No.	Solvent Degreasing Machine Type	Alternate Control Requirement (ACR)	Alternate Control Requirement ID No.	Solvent Sprayed	Solvent Vapor Pressure	Solvent Heated	Parts Larger Than Drainage	Drainage Area	Disposal in Enclosed Containers	Solvent/Air Interface Area	Emission Control Combinations
B77APSC07	R5412-01	COLD	NO		YES	0.6-	NO	NO	16+	YES		

TCEQ 10030 (APD-ID51v1.0 revised 10/22) OP-UA16

This form is for use by sources subject to air quality permit requirements and may be revised periodically. (Title V Release 10/22)

**Cleaning/Depainting Operation Attributes  
Form OP-UA57 (Page 7)**

**Federal Operating Permit Program**

**Table 2: Title 30 Texas Administrative Code Chapter 115 (30TAC Chapter 115)  
Subchapter E: Industrial Cleaning Solvents**

<b>Date:</b> February 14, 2024	<b>Permit:</b> O2215	<b>Regulated Entity No.:</b> RN110300126
<b>Area Name:</b> Adhesive Polymers Plant		<b>Customer Reference No.:</b> CN605483213

Process ID No.	SOP Index No.	Exemptions	Alternate Control Requirement	ACR ID No.	Compliance Demonstration	Minor Modification	Minor Modification ID No.	Vapor Recovery	Emission Control
B77APSC07	R5460-01	461DPRO							
PROAPP	R5460-01	461DPRO							

TCEQ-10264 (APDG 5454v15, Revised 8/14) OP-UA57

This form is for use by facilities subject to air quality permit requirements and may be revised periodically. (Title V Release 07/14)

**Chemical Manufacturing/Elastomer/Thermoplastic Process Unit Attributes**  
**Form OP-UA60 (Page 8)**

**Federal Operating Permit Program**

**Table 5a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)**

**Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic  
Chemical Manufacturing - MCPU Processes**

<b>Date:</b> February 14, 2024	<b>Permit:</b> O2215	<b>Regulated Entity No.:</b> RN110300126
<b>Area Name:</b> Adhesive Polymers Plant		<b>Customer Reference No.:</b> CN605483213

Process ID No.	SOP Index No.	Ammonium Sulfate	Other Operations	63.100 CMPU	G2/<1000 Lb/Yr	2525E1
PROAPP	63FFFF-01	NO	YES	NO	NO	

**Chemical Manufacturing/Elastomer/Thermoplastic Process Unit Attributes  
Form OP-UA60 (Page 9)**

**Federal Operating Permit Program**

**Table 5b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)**

**Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic  
Chemical Manufacturing - MCPU Processes**

<b>Date:</b> February 14, 2024	<b>Permit:</b> O2215	<b>Regulated Entity No.:</b> RN110300126
<b>Area Name:</b> Adhesive Polymers Plant		<b>Customer Reference No.:</b> CN605483213

Process ID No.	SOP Index No.	Startup 2003	Shared Batch Vent	PUG	Startup 2002	PP Alt	Cont Proc
PROAPP	63FFFF-01	YES	NO	NO	YES	NO	

**Chemical Manufacturing/Elastomer/Thermoplastic Process Unit Attributes**  
**Form OP-UA60 (Page 10)**

**Federal Operating Permit Program**

**Table 5c: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)**

**Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic  
Chemical Manufacturing - MCPU Processes**

<b>Date:</b> February 14, 2024	<b>Permit:</b> O2215	<b>Regulated Entity No.:</b> RN110300126
<b>Area Name:</b> Adhesive Polymers Plant		<b>Customer Reference No.:</b> CN605483213

Process ID No.	SOP Index No.	>1000 Lb/Yr	Reduction	New Source	HAP Metals	Fabric Filter	Small CD	Design Eval	Batch Proc Vents
PROAPP	63FFFF-01	NO		NO					NO

TCEQ 10296 (APDG 5153v11, Revised 05/15) OP-UA60  
This form for use by facilities subject to air quality permit requirements and  
may be revised periodically. (Title V Release 04/15)

## **Section 3 - Applicability Identification Forms**

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

Date:	February 14, 2024
Permit No.:	O2215
RN No.:	RN110300126

*For SOP applications, answer ALL questions unless otherwise directed.*

◆ *For GOP applications, answer ONLY these questions unless otherwise directed.*

<b>Form OP-REQ1: Page 1</b>	
<b>I. Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter</b>	
<b>A. Visible Emissions</b>	
1. The application area includes stationary vents constructed on or before January 31, 1972.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes stationary vents constructed after January 31, 1972. <i>If the responses to Questions I.A.1 and I.A.2 are both "NO," go to Question I.A.6.</i> <i>If the response to Question I.A.1 is "NO" and the response to Question I.A.2 is "YES," go to Question I.A.4.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area is opting to comply with the requirements for stationary vents constructed after January 31, 1972 for vents in the application area constructed on or before January 31, 1972.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. All stationary vents are addressed on a unit specific basis.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
5. Test Method 9 (40 CFR Part 60, Appendix A, Method 9 - Visual Determination of the Opacity of Emissions from Stationary Sources) is used to determine opacity of emissions in the application area.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes structures subject to 30 TAC § 111.111(a)(7)(A).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
7. The application area includes sources, other than those specified in 30 TAC § 111.111(a)(1), (4), or (7), subject to 30 TAC § 111.111(a)(8)(A).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
8. Emissions from units in the application area include contributions from uncombined water.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
9. The application area is located in the City of El Paso, including Fort Bliss Military Reservation, and includes solid fuel heating devices subject to 30 TAC § 111.111(c).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A



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<b>Form OP-REQ1: Page 2</b>	
<b>I. Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter (continued)</b>	
<b>B. Materials Handling, Construction, Roads, Streets, Alleys, and Parking Lots</b>	
1. Items a - d determines applicability of any of these requirements based on geographical location.	
a. The application area is located within the City of El Paso.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
b. The application area is located within the Fort Bliss Military Reservation, except areas specified in 30 TAC § 111.141.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
c. The application area is located in the portion of Harris County inside the loop formed by Beltway 8.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
d. The application area is located in the area of Nueces County outlined in Group II state implementation plan (SIP) for inhalable particulate matter adopted by the TCEQ on May 13, 1988.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<i>If there is any "YES" response to Questions I.B.1.a - d, answers Questions I.B.2.a - d. If all responses to Questions I.B.1.a-d are "NO," go to Section I.C.</i>	
2. Items a - d determine the specific applicability of these requirements.	
a. The application area is subject to 30 TAC § 111.143.	<input type="checkbox"/> YES <input type="checkbox"/> NO
b. The application area is subject to 30 TAC § 111.145.	<input type="checkbox"/> YES <input type="checkbox"/> NO
c. The application area is subject to 30 TAC § 111.147.	<input type="checkbox"/> YES <input type="checkbox"/> NO
d. The application area is subject to 30 TAC § 111.149.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>C. Emissions Limits on Nonagricultural Processes</b>	
1. The application area includes a nonagricultural process subject to 30 TAC § 111.151.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area includes a vent from a nonagricultural process that is subject to additional monitoring requirements. <i>If the response to Question I.C.2 is "NO," go to Question I.C.4.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. All vents from nonagricultural process in the application area are subject to additional monitoring requirements.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 3</b>	
<b>I. Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter (continued)</b>	
<b>C. Emissions Limits on Nonagricultural Processes (continued)</b>	
4. The application area includes oil or gas fuel-fired steam generators subject to 30 TAC §§ 111.153(a) and 111.153(c).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
5. The application area includes oil or gas fuel-fired steam generators that are subject to additional monitoring requirements. <i>If the response to Question I.C.5 is "NO," go to Question I.C.7.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
6. All oil or gas fuel-fired steam generators in the application area are subject to additional monitoring requirements.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes solid fossil fuel-fired steam generators subject to 30 TAC §§ 111.153(a) and 111.153(b).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
8. The application area includes solid fossil fuel-fired steam generators that are subject to additional monitoring requirements. <i>If the response to Question I.C.8 is "NO," go to Section I.D.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
9. All solid fossil fuel-fired steam generators in the application area are subject to additional monitoring requirements.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>D. Emissions Limits on Agricultural Processes</b>	
1. The application area includes agricultural processes subject to 30 TAC § 111.171.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>E. Outdoor Burning</b>	
1. Outdoor burning is conducted in the application area. <i>If the response to Question I.E.1 is "NO," go to Section II.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. Fire training is conducted in the application area and subject to the exception provided in 30 TAC § 111.205.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. Fires for recreation, ceremony, cooking, and warmth are used in the application area and subject to the exception provided in 30 TAC § 111.207.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
4. Disposal fires are used in the application area and subject to the exception provided in 30 TAC § 111.209.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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<b>Form OP-REQ1: Page 4</b>	
<b>I. Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter (continued)</b>	
<b>E. Outdoor Burning (continued)</b>	
5. Prescribed burning is used in the application area and subject to the exception provided in 30 TAC § 111.211.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
6. Hydrocarbon burning is used in the application area and subject to the exception provided in 30 TAC § 111.213.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
7. The application area has received the TCEQ Executive Director approval of otherwise prohibited outdoor burning according to 30 TAC § 111.215.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>II. Title 30 TAC Chapter 112 - Control of Air Pollution from Sulfur Compounds</b>	
<b>A. Temporary Fuel Shortage Plan Requirements</b>	
1. The application area includes units that are potentially subject to the temporary fuel shortage plan requirements of 30 TAC §§ 112.15 - 112.18.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
<b>III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds</b>	
<b>A. Applicability</b>	
1. The application area is located in the Houston/Galveston/Brazoria area, Beaumont/Port Arthur area, Dallas/Fort Worth area, El Paso area, or a covered attainment county as defined by 30 TAC § 115.10. <i>See instructions for inclusive counties. If the response to Question III.A.1 is "NO," go to Section IV.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
<b>B. Storage of Volatile Organic Compounds</b>	
1. The application area includes storage tanks, reservoirs, or other containers capable of maintaining working pressure sufficient at all times to prevent any VOC vapor or gas loss to the atmosphere.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

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For SOP applications, answer ALL questions unless otherwise directed.

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<b>Form OP-REQ1: Page 5</b>	
<b>III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)</b>	
<b>C. Industrial Wastewater</b>	
1. The application area includes affected VOC wastewater streams of an affected source category, as defined in 30 TAC § 115.140. <i>If the response to Question III.C.1 is "NO" or "N/A," go to Section III.D.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area is located at a petroleum refinery in the Beaumont/Port Arthur or Houston/Galveston/Brazoria area. <i>If the response to Question III.C.2 is "YES" and the refinery is in the Beaumont/Port Arthur area, go to Section III.D.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area is complying with the provisions of 40 CFR Part 63, Subpart G, as an alternative to complying with this division (relating to Industrial Wastewater). <i>If the response to Question III.C.3 is "YES," go to Section III.D.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area is located at a plant with an annual VOC loading in wastewater, as determined in accordance with 30 TAC § 115.148, less than or equal to 10 Mg (11.03 tons). <i>If the response to Question III.C.4 is "YES," go to Section III.D.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes wastewater drains, junction boxes, lift stations, or weirs that are subject to the control requirements of 30 TAC § 115.142(1).	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes wastewater drains, junction boxes, lift stations, or weirs that handle streams chosen for exemption under 30 TAC § 115.147(2).	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes wastewater drains, junction boxes, lift stations, or weirs that have an executive director approved exemption under 30 TAC § 115.147(4).	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>D. Loading and Unloading of VOCs</b>	
1. The application area includes VOC loading operations.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area includes VOC transport vessel unloading operations. <i>For GOP applications, if the responses to Questions III.D.1 - D.2 are "NO," go to Section III.E.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 6</b>	
<b>III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)</b>	
<b>D. Loading and Unloading of VOCs (continued)</b>	
3. Transfer operations at motor vehicle fuel dispensing facilities are the only VOC transfer operations conducted in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>E. Filling of Gasoline Storage Vessels (Stage I) for Motor Vehicle Fuel Dispensing Facilities</b>	
1. The application area includes one or more motor vehicle fuel dispensing facilities and gasoline is transferred from a tank-truck tank into a stationary storage container. <i>If the response to Question III.E.1 is "NO," go to Section III.F.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. Transfers to stationary storage containers used exclusively for the fueling of agricultural implements are the only transfer operations conducted at facilities in the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. All transfers at facilities in the application area are made into stationary storage containers with internal floating roofs, external floating roofs, or their equivalent. <i>If the response to Question III.E.2 and/or E.3 is "YES," go to Section III.F.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area is located in a covered attainment county as defined in 30 TAC § 115.10. <i>If the response to Question III.E.4 is "NO," go to Question III.E.9.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. Stationary gasoline storage containers with a nominal capacity less than or equal to 1,000 gallons are located at the facility.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. Stationary gasoline storage containers with a nominal capacity greater than 1,000 gallons are located at the facility.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. At facilities located in covered attainment counties other than Bastrop, Bexar, Caldwell, Comal, Guadalupe, Hays, Travis, Williamson, or Wilson County, transfers are made to stationary storage tanks greater than 1000 gallons located at a facility which has dispensed less than 100,000 gallons of gasoline in a calendar month after October 31, 2014. <i>If the response to Question III.E.7 is "YES," go to Section III.F.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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*For SOP applications, answer ALL questions unless otherwise directed.*

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<b>Form OP-REQ1: Page 7</b>	
<b>III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)</b>	
<b>E. Filling of Gasoline Storage Vessels (Stage I) for Motor Vehicle Fuel Dispensing Facilities (continued)</b>	
8. At facilities located in Bastrop, Bexar, Caldwell, Comal, Guadalupe, Hays, Travis, Williamson, or Wilson County, transfers are made to stationary storage tanks greater than 1000 gallons located at a facility which has dispensed no more than 25,000 gallons of gasoline in a calendar month after December 31, 2004. <i>If the response to Question III.E.8 is "YES," go to Section III.F.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. Transfers are made to stationary storage tanks located at a motor vehicle fuel dispensing facility which has dispensed no more than 10,000 gallons of gasoline in any calendar month after January 1, 1991 and for which construction began prior to November 15, 1992.	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. Transfers are made to stationary storage tanks located at a motor vehicle fuel dispensing facility which has dispensed more than 10,000 gallons of gasoline in any calendar month after January 1, 1991 and for which construction began prior to November 15, 1992.	<input type="checkbox"/> YES <input type="checkbox"/> NO
11. Transfers are made to stationary storage tanks located at a motor vehicle fuel dispensing facility which commenced construction on or after November 15, 1992.	<input type="checkbox"/> YES <input type="checkbox"/> NO
12. At facilities located in Ellis, Johnson, Kaufman, Parker, or Rockwall County, transfers are made to stationary storage tanks located at a facility which has dispensed at least 10,000 gallons of gasoline but less than 125,000 gallons of gasoline in a calendar month after April 30, 2005.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>F. Control of VOC Leaks from Transport Vessels (Complete this section for GOP applications for GOPs 511, 512, 513 and 514 only)</b>	
1. Tank-truck tanks are filled with, or emptied of, gasoline at a facility that is subject to 30 TAC § 115.214(a)(1)(C) or 115.224(2) within the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A

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For SOP applications, answer ALL questions unless otherwise directed.

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<b>Form OP-REQ1: Page 8</b>	
<b>III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)</b>	
<b>F. Control of VOC Leaks from Transport Vessels (Complete this section for GOP applications for GOPs 511, 512, 513 and 514 only) (continued)</b>	
2. Tank-truck tanks are filled with non-gasoline VOCs having a TVP greater than or equal to 0.5 psia under actual storage conditions at a facility subject to 30 TAC § 115.214(a)(1)(C) within the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
3. Tank-truck tanks are filled with, or emptied of, gasoline at a facility that is subject to 30 TAC § 115.214(b)(1)(C) or 115.224(2) within the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
<b>G. Control of Vehicle Refueling Emissions (Stage II) at Motor Vehicle Fuel Dispensing Facilities</b>	
1. The application area includes one or more motor vehicle fuel dispensing facilities and gasoline is transferred from a stationary storage container into motor vehicle fuel tanks. <i>If the response to Question III.G.1 is "NO" or "N/A," go to Section III.H.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area includes facilities that began construction on or after November 15, 1992 and prior to May 16, 2012.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes facilities that began construction prior to November 15, 1992. <i>If the responses to Questions III.G.2 and Question III.G.3 are both "NO," go to Section III.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes only facilities that have a monthly throughput of less than 10,000 gallons of gasoline.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The decommissioning of all Stage II vapor recovery control equipment located in the application area has been completed and the decommissioning notice submitted.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A

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*For SOP applications, answer ALL questions unless otherwise directed.*

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<b>Form OP-REQ1: Page 9</b>	
<b>III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)</b>	
<b>H. Control Of Reid Vapor Pressure (RVP) of Gasoline</b>	
1. The application area includes stationary tanks, reservoirs, or other containers holding gasoline that may ultimately be used in a motor vehicle in El Paso County. <i>If the response to Question III.H.1 is "NO" or "N/A," go to Section III.I.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
2. The application area includes stationary tanks, reservoirs, or other containers holding gasoline that will be used exclusively for the fueling of agricultural implements.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes a motor vehicle fuel dispensing facility.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes stationary tanks, reservoirs, or other containers holding gasoline and having a nominal capacity of 500 gallons or less.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>I. Process Unit Turnaround and Vacuum-Producing Systems in Petroleum Refineries</b>	
1. The application area is located at a petroleum refinery.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>J. Surface Coating Processes (Complete this section for GOP applications only.)</b>	
1. Surface coating operations (other than those performed on equipment located on-site and in-place) that meet the exemption specified in 30 TAC § 115.427(3)(A) or 115.427(7) are performed in the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A



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<b>Form OP-REQ1: Page 10</b>	
<b>III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)</b>	
<b>K. Cutback Asphalt</b>	
1. Conventional cutback asphalt containing VOC solvents for the paving of roadways, driveways, or parking lots, is used or specified for use in the application area by a state, municipal, or county agency. <i>If the response to Question III.K.1 is "N/A," go to Section III.L.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The use, application, sale, or offering for sale of conventional cutback asphalt containing VOC solvents for the paving of roadways, driveways, or parking lots occurs in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
3. Asphalt emulsion is used or produced within the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
4. The application area is using an alternate control requirement as specified in 30 TAC § 115.513. <i>If the response to Question III.K.4 is "NO," go to Section III.L.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
5. The application area uses, applies, sells, or offers for sale asphalt concrete, made with cutback asphalt, that meets the exemption specified in 30 TAC § 115.517(1).	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area uses, applies, sells, or offers for sale cutback asphalt that is used solely as a penetrating prime coat.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The applicant using cutback asphalt is a state, municipal, or county agency.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>L. Degassing of Storage Tanks, Transport Vessels and Marine Vessels</b>	
1. The application area includes degassing operations for stationary, marine, and/or transport vessels. <i>If the response to Question III.L.1 is "NO" or "N/A," go to Section III.M.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
2. Degassing of only ocean-going, self-propelled VOC marine vessels is performed in the application area. <i>If the response to Question III.L.2 is "YES," go to Section III.M.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A

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<b>III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)</b>	
<b>L. Degassing of Storage Tanks, Transport Vessels and Marine Vessels (continued)</b>	
3. Degassing of stationary VOC storage vessels with a nominal storage capacity of 1,000,000 gallons or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
4. Degassing of stationary VOC storage vessels with a nominal storage capacity of 250,000 gallons or more, or a nominal storage capacity of 75,000 gallons and storing materials with a true vapor pressure greater than 2.6 psia, and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
5. Degassing of VOC transport vessels with a nominal storage capacity of 8,000 gallons or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
6. Degassing of VOC marine vessels with a nominal storage capacity of 10,000 barrels (420,000 gallons) or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
7. Degassing of VOC marine vessels with a nominal storage capacity of 10,000 barrels (420,000 gallons) and a vapor space partial pressure $\geq$ 0.5 psia that have sustained damage as specified in 30 TAC § 115.547(5) is performed in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
<b>M. Petroleum Dry Cleaning Systems</b>	
1. The application area contains one or more petroleum dry cleaning facilities that use petroleum based solvents.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A

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<b>III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)</b>	
<b>N. Vent Gas Control (Highly-reactive volatile organic compounds (HRVOC))</b>	
1. The application area includes one or more vent gas streams containing HRVOC.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area includes one or more flares that emit or have the potential to emit HRVOC. <i>If the responses to Questions III.N.1 and III.N.2 are both "NO" or "N/A," go to Section III.O. If the response to Question III.N.1 is "YES," continue with Question III.N.3.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
3. All vent streams in the application area that are routed to a flare contain less than 5.0% HRVOC by weight at all times.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
4. All vent streams in the application area that are not routed to a flare contain less than 100 ppmv HRVOC at all times. <i>If the responses to Questions III.N.3 and III.N.4 are both "NO," go to Section III.O.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
5. The application area contains pressure relief valves that are not controlled by a flare.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area has at least one vent stream which has no potential to emit HRVOC.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area has vent streams from a source described in 30 TAC § 115.727(c)(3)(A) - (H).	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
<b>O. Cooling Tower Heat Exchange Systems (HRVOC)</b>	
1. The application area includes one or more cooling tower heat exchange systems that emit or have the potential to emit HRVOC.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A

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<b>Form OP-REQ1: Page 13</b>	
<b>IV. Title 30 TAC Chapter 117 - Control of Air Pollution from Nitrogen Compounds</b>	
<b>A. Applicability</b>	
1. The application area is located in the Houston/Galveston/Brazoria, Beaumont/Port Arthur, or Dallas/Fort Worth Eight-Hour area. <i>For SOP applications, if the response to Question IV.A.1 is "YES," complete Sections IV.B - IV.F and IV.H.</i> <i>For GOP applications for GOPs 511, 512, 513, or 514, if the response to Question IV.A.1 is "YES," go to Section IV.F.</i> <i>For GOP applications for GOP 517, if the response to Question IV.A.1 is "YES," complete Sections IV.C and IV.F.</i> <i>For GOP applications, if the response to Question IV.A.1 is "NO," go to Section VI.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area is located in Bexar, Comal, Ellis, Hays, or McLennan County and includes a cement kiln. <i>If the response to Question IV.A.2 is "YES," go to Question IV.H.1.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes a utility electric generator in an east or central Texas county. <i>See instructions for a list of counties included.</i> <i>If the response to Question IV.A.3 is "YES," go to Question IV.G.1.</i> <i>If the responses to Questions IV.A.1 - 3 are all "NO," go to Question IV.H.1.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>B. Utility Electric Generation in Ozone Nonattainment Areas</b>	
1. The application area includes units specified in 30 TAC §§ 117.1000, 117.1200, or 117.1300. <i>If the response to Question IV.B.1 is "NO," go to Question IV.C.1.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area is complying with a System Cap in 30 TAC §§ 117.1020 or 117.1220.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 14</b>	
<b>IV. Title 30 TAC Chapter 117 - Control of Air Pollution from Nitrogen Compounds (continued)</b>	
<b>C. Commercial, Institutional, and Industrial Sources in Ozone Nonattainment Areas</b>	
1. The application area is located at a site subject to 30 TAC Chapter 117, Subchapter B and includes units specified in 30 TAC §§ 117.100, 117.300, or 117.400. <i>For SOP applications, if the response to Question IV.C.1 is "NO," go to Question IV.D.1. For GOP applications for GOP 517, if the response to Question IV.C.1 is "NO," go to Section IV.F.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area is located at a site that was a major source of NO <sub>x</sub> before November 15, 1992.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
3. The application area includes an electric generating facility required to comply with the System Cap in 30 TAC § 117.320.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>D. Adipic Acid Manufacturing</b>	
1. The application area is located at, or part of, an adipic acid production unit.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
<b>E. Nitric Acid Manufacturing - Ozone Nonattainment Areas</b>	
1. The application area is located at, or part of, a nitric acid production unit.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
<b>F. Combustion Control at Minor Sources in Ozone Nonattainment Areas - Boilers, Process Heaters, Stationary Engines and Gas Turbines</b>	
1. The application area is located at a site that is a minor source of NO <sub>x</sub> in the Houston/Galveston/Brazoria or Dallas/Fort Worth Eight-Hour areas (except for Wise County). <i>For SOP applications, if the response to Question IV.F.1 is "NO," go to Question IV.G.1. For GOP applications, if the response to Question IV.F.1 is "NO," go to Section VI.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area is located in the Houston/Galveston/Brazoria area and has units that qualify for an exemption under 30 TAC § 117.2003(a).	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area is located in the Houston/Galveston/Brazoria area and has units that qualify for an exemption under 30 TAC § 117.2003(b).	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>IV. Title 30 TAC Chapter 117 - Control of Air Pollution from Nitrogen Compounds (continued)</b>	
<b>F. Combustion Control at Minor Sources in Ozone Nonattainment Areas - Boilers, Process Heaters, Stationary Engines and Gas Turbines (continued)</b>	
4. The application area is located in the Dallas/Fort Worth Eight-Hour area (except for Wise County) and has units that qualify for an exemption under 30 TAC § 117.2103.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area has units subject to the emission specifications under 30 TAC §§ 117.2010 or 30 TAC § 117.2110.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area has a unit that has been approved for alternative case specific specifications (ACSS) in 30 TAC § 117.2025 or 30 TAC § 117.2125. <i>If the response to Question IV.F.6 is "NO," go to Section IV.G.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. An ACSS for carbon monoxide (CO) has been approved?	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. An ACSS for ammonia (NH <sub>3</sub> ) has been approved?	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. Provide the Permit Number(s) and authorization/issuance date(s) of the NSR project(s) that incorporates an ACSS below.	
<b>G. Utility Electric Generation in East and Central Texas</b>	
1. The application area includes utility electric power boilers and/or stationary gas turbines (including duct burners used in turbine exhaust ducts) that were placed into service before December 31, 1995. <i>If the response to Question IV.G.1 is "NO," go to Question IV.H.1.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area is complying with the System Cap in 30 TAC § 117.3020.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>H. Multi-Region Combustion Control - Water Heaters, Small Boilers, and Process Heaters</b>	
1. The application area includes a manufacturer, distributor, retailer or installer of natural gas fired water heaters, boilers or process heaters with a maximum rated capacity of 2.0 MMBtu/hr or less. <i>If the response to question IV.H.1 is "NO," go to Section V.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. All water heaters, boilers or process heaters manufactured, distributed, retailed or installed qualify for an exemption under 30 TAC § 117.3203.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>V. Title 40 Code of Federal Regulations Part 59 (40 CFR Part 59) - National Volatile Organic Compound Emission Standards for Consumer and Commercial Products</b>	
<b>A. Subpart B - National Volatile Organic Compound Emission Standards for Automobile Refinish Coatings</b>	
1. The application area manufactures automobile refinishing coatings or coating components and sells or distributes these coatings or coating components in the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area imports automobile refinishing coatings or coating components, manufactured on or after January 11, 1999, and sells or distributes these coatings or coating components in the United States. <i>If the responses to Questions V.A.1 and V.A.2 are both "NO," go to Section V.B.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. All automobile refinishing coatings or coating components manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR § 59.100(c)(1) - (6).	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>B. Subpart C - National Volatile Organic Compound Emission Standards for Consumer Products</b>	
1. The application area manufactures consumer products for sale or distribution in the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area imports consumer products manufactured on or after December 10, 1998 and sells or distributes these consumer products in the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area is a distributor of consumer products whose name appears on the label of one or more of the products. <i>If the responses to Questions V.B.1 - V.B.3 are all "NO," go to Section V.C.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
4. All consumer products manufactured, imported, or distributed by the application area meet one or more of the exemptions specified in 40 CFR § 59.201(c)(1) - (7).	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>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)</b>	
<b>C. Subpart D - National Volatile Organic Compound Emission Standards for Architectural Coatings</b>	
1. The application area manufactures or imports architectural coatings for sale or distribution in the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area manufactures or imports architectural coatings that are registered under the Federal Insecticide, Fungicide, and Rodenticide Act. <i>If the responses to Questions V.C.1-2 are both "NO," go to Section V.D.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. All architectural coatings manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR §59.400(c)(1)-(5).	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>D. Subpart E - National Volatile Organic Compound Emission Standards for Aerosol Coatings</b>	
1. The application area manufactures or imports aerosol coating products for sale or distribution in the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area is a distributor of aerosol coatings for resale or distribution in the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>E. Subpart F - Control of Evaporative Emissions From New and In-Use Portable Fuel Containers</b>	
1. The application area manufactures or imports portable fuel containers for sale or distribution in the United States. <i>If the response to Question V.E.1 is "NO," go to Section VI.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. All portable fuel containers manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR § 59.605(a) - (c).	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards</b>	
<b>A. Applicability</b>	
1. The application area includes a unit(s) that is subject to one or more 40 CFR Part 60 subparts. <i>If the response to Question VI.A.1 is "NO," go to Section VII.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO



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<b>VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)</b>	
<b>B. Subpart Y - Standards of Performance for Coal Preparation and Processing Plants</b>	
1. The application area is located at a coal preparation and processing plant. <i>If the response to Question VI.B.1 is "NO," go to Section VI.C.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The coal preparation and processing plant has a design capacity greater than 200 tons per day (tpd). <i>If the response to Question VI.B.2 is "NO," go to Section VI.C.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The plant has an option to enforceably limit its operating level to less than 200 tpd and is choosing this option. <i>If the response to Question VI.B.3 is "YES," go to Section VI.C.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The plant contains an open storage pile, as defined in § 60.251, as an affected facility. <i>If the response to Question VI.B.4 is "NO," go to Section VI.C.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The open storage pile was constructed, reconstructed or modified after May 27, 2009.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>C. Subpart GG - Standards of Performance for Stationary Gas Turbines (GOP applicants only)</b>	
1. The application area includes one or more stationary gas turbines that have a heat input at peak load greater than or equal to 10 MMBtu/hr (10.7GJ/hr), based on the lower heating value of the fuel fired. <i>If the response to Question VI.C.1 is "NO" or "N/A," go to Section VI.D.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
2. One or more of the affected facilities were constructed, modified, or reconstructed after October 3, 1977 and prior to February 19, 2005. <i>If the response to Question VI.C.2 is "NO," go to Section VI.D.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. One or more stationary gas turbines in the application area are using a previously approved alternative fuel monitoring schedule as specified in 40 CFR § 60.334(h)(4).	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The exemption specified in 40 CFR § 60.332(e) is being utilized for one or more stationary gas turbines in the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)</b>	
<b>C. Subpart GG - Standards of Performance for Stationary Gas Turbines (GOP applicants only) (continued)</b>	
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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>D. Subpart XX - Standards of Performance for Bulk Gasoline Terminals</b>	
1. The application area includes bulk gasoline terminal loading racks. <i>If the response to Question VI.D.1 is "NO," go to Section VI.E.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> 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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>E. Subpart LLL - Standards of Performance for Onshore Natural Gas Processing: Sulfur Dioxide (SO<sub>2</sub>) Emissions</b>	
1. The application area includes affected facilities identified in 40 CFR § 60.640(a) that process natural gas (onshore). <i>For SOP applications, if the response to Question VI.E.1 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.1 is "NO" or "N/A," go to Section VI.H.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The affected facilities commenced construction or modification after January 20, 1984 and on or before August 23, 2011. <i>For SOP applications, if the response to Question VI.E.2 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.2 is "NO," go to Section VI.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> 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. <i>For SOP applications, if the response to Question VI.E.3 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.3 is "NO," go to Section VI.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)</b>	
<b>E. Subpart LLL - Standards of Performance for Onshore Natural Gas Processing: Sulfur Dioxide (SO<sub>2</sub>) Emissions (continued)</b>	
4. Federally enforceable operating limits have been established in the preconstruction authorization limiting the gas sweetening unit to less than 2 LTPD. <i>For SOP applications, if the response to Question VI.E.4. is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.4. is "NO," go to Section VI.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. Please provide the Unit ID(s) for the gas sweetening unit(s) that have established federally enforceable operating limits in the space provided below.	
<b>F. Subpart OOO - Standards of Performance for Nonmetallic Mineral Processing Plants</b>	
1. The application area includes affected facilities identified in 40 CFR § 60.670(a)(1) that are located at a fixed or portable nonmetallic mineral processing plant. <i>If the response to Question VI.F.1 is "NO," go to Section VI.G.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. Affected facilities identified in 40 CFR § 60.670(a)(1) and located in the application area are subject to 40 CFR Part 60, Subpart OOO.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>G. Subpart QQQ - Standards of Performance for VOC Emissions from Petroleum Refinery Wastewater Systems</b>	
1. The application area is located at a petroleum refinery and includes one or more of the affected facilities identified in 40 CFR § 60.690(a)(2) - (4) for which construction, modification, or reconstruction was commenced after May 4, 1987. <i>If the response to Question VI.G.1 is "NO," go to Section VI.H.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes storm water sewer systems.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)</b>	
<b>G. Subpart QQQ - Standards of Performance for VOC Emissions from Petroleum Refinery Wastewater Systems (continued)</b>	
3. The application area includes ancillary equipment which is physically separate from the wastewater system and does not come in contact with or store oily wastewater.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes non-contact cooling water systems.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes individual drain systems. <i>If the response to Question VI.G.5 is "NO," go to Section VI.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes one or more individual drain systems that meet the exemption specified in 40 CFR § 60.692-2(d).	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes completely closed drain systems.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>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</b>	
1. The application area includes at least one small municipal waste incineration unit, other than an air curtain incinerator. <i>If the response to Question VI.H.1. is "N/A," go to Section VI.I. If the response to Question VI.H.1 is "NO," go to Question VI.H.4.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area includes at least one small municipal waste incineration unit, other than an air curtain incinerator, constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes at least one small municipal waste incineration unit, other than an air curtain incinerator, constructed before August 30, 1999 and not modified or reconstructed on or after June 6, 2006.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes at least one air curtain incinerator. <i>If the response to Question VI.H.4 is "NO," go to Section VI.I.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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<b>Form OP-REQ1: Page 22</b>	
<b>VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)</b>	
<b>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)</b>	
5. The application area includes at least one air curtain incinerator constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006. <i>If the response to Question VI.H.5 is "NO," go to Question VI.H.7.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. All air curtain incinerators constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006 combust only yard waste.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes at least one air curtain incinerator constructed before August 30, 1999 and not modified or reconstructed on or after June 6, 2006.	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. All air curtain incinerators constructed before August 30, 1999 and not modified or reconstructed on or after June 6, 2006 combust only yard waste.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>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</b>	
1. The application area includes at least one commercial or industrial solid waste incineration unit, other than an air curtain incinerator. <i>If the response to Question VI.I.1 is "N/A," go to Section VI.J. If the response to Question VI.I.1 is "NO," go to Question VI.I.4.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area includes at least one commercial or industrial solid waste incineration unit, other than an air curtain incinerator, constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 23</b>	
<b>VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)</b>	
<b>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)</b>	
3. The application area includes at least one commercial or industrial solid waste incineration unit, other than an air curtain incinerator, constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes at least one air curtain incinerator. <i>If the response to Question VI.I.4 is "NO," go to Section VI.J.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
5. The application area includes at least one air curtain incinerator, constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001. <i>If the response to Question VI.I.5 is "NO," go to VI.I.7.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. All air curtain incinerators constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes at least one air curtain incinerator, constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001.	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. All air curtain incinerators constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 24</b>	
<b>VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)</b>	
<b>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</b>	
1. The application area includes at least one very small municipal waste incineration unit or institutional incineration unit, other than an air curtain incinerator. <i>If the response to Question VI.J.1 is "N/A," go to Section VI.K. If the response to Question VI.J.1 is "NO," go to Question VI.J.4.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area includes at least one very small municipal waste incineration unit, other than an air curtain incinerator, constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes at least one very small municipal waste incineration unit, other than an air curtain incinerator, constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes at least one air curtain incinerator. <i>If the response to Question VI.J.4 is "NO," go to Section VI.K.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
5. The application area includes at least one air curtain incinerator constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006. <i>If the response to Question VI.J.5 is "NO," go to Question VI.J.7.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. All air curtain incinerators constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes at least one air curtain incinerator constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 25</b>	
<b>VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (NSPS) (continued)</b>	
<b>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)</b>	
8. All air curtain incinerators constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. The air curtain incinerator is located at an institutional facility and is a distinct operating unit of the institutional facility that generated the waste.	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The air curtain incinerator burns less than 35 tons per day of wood waste, clean lumber, or yard waste or a mixture of these materials.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>K. Subpart OOOO - Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution</b>	
1. The application area includes one or more of the onshore affected facilities listed in 40 CFR § 60.5365(a)-(g) that are subject to 40 CFR Part 60, Subpart OOOO.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants</b>	
<b>A. Applicability</b>	
1. The application area includes a unit(s) that is subject to one or more 40 CFR Part 61 subparts. <i>If the response to Question VII.A.1 is "NO" or "N/A," go to Section VIII.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
<b>B. Subpart F - National Emission Standard for Vinyl Chloride</b>	
1. The application area is located at a plant which produces ethylene dichloride by reaction of oxygen and hydrogen chloride with ethylene, vinyl chloride by any process, and/or one or more polymers containing any fraction of polymerized vinyl chloride.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>C. Subpart J - National Emission Standard for Benzene Emissions for Equipment Leaks (Fugitive Emission Sources) of Benzene (Complete this section for GOP applications only)</b>	
1. The application area includes equipment in benzene service.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A



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<b>VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)</b>	
<b>D. Subpart L - National Emission Standard for Benzene Emissions from Coke By-Product Recovery Plants</b>	
1. The application area is located at a coke by-product recovery plant and includes one or more of the affected sources identified in 40 CFR § 61.130(a) - (b). <i>If the response to Question VII.D.1 is "NO," go to Section VII.E.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area includes equipment in benzene service as determined by 40 CFR § 61.137(b).	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area has elected to comply with the provisions of 40 CFR § 61.243-1 and 40 CFR § 61.243-2.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>E. Subpart M - National Emission Standard for Asbestos</b>	
<b>Applicability</b>	
1. The application area includes sources, operations, or activities specified in 40 CFR §§ 61.143, 61.144, 61.146, 61.147, 61.148, or 61.155. <i>If the response to Question VII.E.1 is "NO," go to Section VII.F.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Roadway Construction</b>	
2. The application area includes roadways constructed or maintained with asbestos tailings or asbestos-containing waste material.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Manufacturing Commercial Asbestos</b>	
3. The application area includes a manufacturing operation using commercial asbestos. <i>If the response to Question VII.E.3 is "NO," go to Question VII.E.4.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
a. Visible emissions are discharged to outside air from the manufacturing operation	<input type="checkbox"/> YES <input type="checkbox"/> NO
b. An alternative emission control and waste treatment method is being used that has received prior U.S. Environmental Protection Agency (EPA) approval.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)</b>	
<b>E. Subpart M - National Emission Standard for Asbestos (continued)</b>	
<b>Manufacturing Commercial Asbestos (continued)</b>	
c. Asbestos-containing waste material is processed into non-friable forms.	<input type="checkbox"/> YES <input type="checkbox"/> NO
d. Asbestos-containing waste material is adequately wetted.	<input type="checkbox"/> YES <input type="checkbox"/> NO
e. Alternative filtering equipment is being used that has received EPA approval.	<input type="checkbox"/> YES <input type="checkbox"/> NO
f. A high efficiency particulate air (HEPA) filter is being used that is certified to be at least 99.97% efficient for 0.3 micron particles	<input type="checkbox"/> YES <input type="checkbox"/> NO
g. The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Asbestos Spray Application</b>	
4. The application area includes operations in which asbestos-containing materials are spray applied. <i>If the response to Question VII.E.4 is "NO," go to Question VII.E.5.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
a. Asbestos fibers are encapsulated with a bituminous or resinous binder during spraying and are not friable after drying. <i>If the response to Question VII.E.4.a is "YES," go to Question VII.E.5.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
b. Spray-on applications on buildings, structures, pipes, and conduits do not use material containing more than 1% asbestos.	<input type="checkbox"/> YES <input type="checkbox"/> NO
c. An alternative emission control and waste treatment method is being used that has received prior EPA approval.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 28</b>	
<b>VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)</b>	
<b>E. Subpart M - National Emission Standard for Asbestos (continued)</b>	
<b>Asbestos Spray Application (continued)</b>	
d. Asbestos-containing waste material is processed into non-friable forms.	<input type="checkbox"/> YES <input type="checkbox"/> NO
e. Asbestos-containing waste material is adequately wetted.	<input type="checkbox"/> YES <input type="checkbox"/> NO
f. Alternative filtering equipment is being used that has received EPA approval.	<input type="checkbox"/> YES <input type="checkbox"/> NO
g. A HEPA filter is being used that is certified to be at least 99.97% efficient for 0.3 micron particles.	<input type="checkbox"/> YES <input type="checkbox"/> NO
h. The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Fabricating Commercial Asbestos</b>	
5. The application area includes a fabricating operation using commercial asbestos. <i>If the response to Question VII.E.5 is "NO," go to Question VII.E.6.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
a. Visible emissions are discharged to outside air from the manufacturing operation.	<input type="checkbox"/> YES <input type="checkbox"/> NO
b. An alternative emission control and waste treatment method is being used that has received prior EPA approval.	<input type="checkbox"/> YES <input type="checkbox"/> NO
c. Asbestos-containing waste material is processed into non-friable forms.	<input type="checkbox"/> YES <input type="checkbox"/> NO
d. Asbestos-containing waste material is adequately wetted.	<input type="checkbox"/> YES <input type="checkbox"/> NO
e. Alternative filtering equipment is being used that has received EPA approval.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 29</b>	
<b>VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)</b>	
<b>E. Subpart M - National Emission Standard for Asbestos (continued)</b>	
<b><i>Fabricating Commercial Asbestos (continued)</i></b>	
f. A HEPA filter is being used that is certified to be at least 99.97% efficient for 0.3 micron particles.	<input type="checkbox"/> YES <input type="checkbox"/> NO
g. The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b><i>Non-sprayed Asbestos Insulation</i></b>	
6. The application area includes insulating materials (other than spray applied insulating materials) that are either molded and friable or wet-applied and friable after drying.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b><i>Asbestos Conversion</i></b>	
7. The application area includes operations that convert regulated asbestos-containing material and asbestos-containing waste material into nonasbestos (asbestos-free) material.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>F. Subpart P - National Emission Standard for Inorganic Arsenic Emissions from Arsenic Trioxide and Metallic Arsenic Production Facilities</b>	
1. The application area is located at a metallic arsenic production plant or at an arsenic trioxide plant that processes low-grade arsenic bearing materials by a roasting condensation process.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>G. Subpart BB - National Emission Standard for Benzene Emissions from Benzene Transfer Operations</b>	
1. The application area is located at a benzene production facility and/or bulk terminal. <i>If the response to Question VII.G.1 is "NO," go to Section VII.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area includes benzene transfer operations at marine vessel loading racks.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 30</b>	
<b>VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)</b>	
<b>G. Subpart BB - National Emission Standard for Benzene Emissions from Benzene Transfer Operations (continued)</b>	
3. The application area includes benzene transfer operations at railcar loading racks.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes benzene transfer operations at tank-truck loading racks.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>H. Subpart FF - National Emission Standard for Benzene Waste Operations</b>	
<b>Applicability</b>	
1. The application area includes a chemical manufacturing plant, coke by-product recovery plant, or petroleum refinery facility as defined in § 61.341.	<input type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area is located at a hazardous waste treatment, storage, and disposal (TSD) facility site as described in 40 CFR § 61.340(b). <i>If the responses to Questions VII.H.1 and VII.H.2 are both "NO," go to Section VIII.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area is located at a site that has no benzene onsite in wastes, products, byproducts, or intermediates. <i>If the response to Question VII.H.3 is "YES," go to Section VIII.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area is located at a site having a total annual benzene quantity from facility waste less than 1 megagram per year (Mg/yr). <i>If the response to Question VII.H.4 is "YES," go to Section VIII</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area is located at a site having a total annual benzene quantity from facility waste greater than or equal to 1 Mg/yr but less than 10 Mg/yr. <i>If the response to Question VII.H.5 is "YES," go to Section VIII.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 31</b>	
<b>VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)</b>	
<b>H. Subpart FF - National Emission Standard for Benzene Waste Operations (continued)</b>	
<b>Applicability (continued)</b>	
6. The flow-weighted annual average benzene concentration of each waste stream at the site is based on documentation.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area has waste streams with flow-weighted annual average water content of 10% or greater.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Waste Stream Exemptions</b>	
8. The application area has waste streams that meet the exemption specified in 40 CFR § 61.342(c)(2) (the flow-weighted annual average benzene concentration is less than 10 ppmw).	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. The application area has waste streams that meet the exemption specified in 40 CFR § 61.342(c)(3) because process wastewater has a flow rate less than 0.02 liters per minute or an annual wastewater quantity less than 10 Mg/yr.	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The application area has waste streams that meet the exemption specified in 40 CFR § 61.342(c)(3) because the total annual benzene quantity is less than or equal to 2 Mg/yr.	<input type="checkbox"/> YES <input type="checkbox"/> NO
11. The application area transfers waste off-site for treatment by another facility.	<input type="checkbox"/> YES <input type="checkbox"/> NO
12. The application area is complying with 40 CFR § 61.342(d).	<input type="checkbox"/> YES <input type="checkbox"/> NO
13. The application area is complying with 40 CFR § 61.342(e). <i>If the response to Question VII.H.13 is "NO," go to Question VII.H.15.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
14. The application area has facility waste with a flow weighted annual average water content of less than 10%.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 32</b>	
<b>VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)</b>	
<b>H. Subpart FF - National Emission Standard for Benzene Waste Operations (continued)</b>	
<b>Container Requirements</b>	
15. The application area has containers, as defined in 40 CFR § 61.341, that receive non-exempt benzene waste. <i>If the response to Question VII.H.15 is "NO," go to Question VII.H.18.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
16. The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers. <i>If the response to Question VII.H.16 is "YES," go to Question VII.H.18.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
17. Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Individual Drain Systems</b>	
18. The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage non-exempt benzene waste. <i>If the response to Question VII.H.18 is "NO," go to Question VII.H.25.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
19. The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. <i>If the response to Question VII.H.19 is "YES," go to Question VII.H.25.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
20. The application area has individual drain systems complying with 40 CFR § 61.346(a). <i>If the response to Question VII.H.20 is "NO," go to Question VII.H.22.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
21. Covers and closed-vent systems used for individual drain systems operate such that the individual drain system is maintained at a pressure less than atmospheric pressure.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)</b>	
<b>H. Subpart FF - National Emission Standard for Benzene Waste Operations (continued)</b>	
<b>Individual Drain Systems (continued)</b>	
22. The application area has individual drain systems complying with 40 CFR § 61.346(b). <i>If the response to Question VII.H.22 is "NO," go to Question VII.H.25.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
23. Junction boxes in the individual drain systems are equipped with a system to prevent the flow of organic vapors from the junction box vent pipe to the atmosphere during normal operation.	<input type="checkbox"/> YES <input type="checkbox"/> NO
24. Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Remediation Activities</b>	
25. Remediation activities take place at the application area subject to 40 CFR Part 61, Subpart FF.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories</b>	
<b>A. Applicability</b>	
1. The application area includes a unit(s) that is subject to one or more 40 CFR Part 63 subparts other than subparts made applicable by reference under subparts in 40 CFR Part 60, 61 or 63. <i>See instructions for 40 CFR Part 63 subparts made applicable only by reference.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
<b>B. Subpart F - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry</b>	
1. The application area is located at a plant site that is a major source as defined in the Federal Clean Air Act § 112(a). <i>If the response to Question VIII.B.1 is "NO," go to Section VIII.D.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO



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**VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)**

**B. Subpart F - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry (continued)**

2. The application area is located at a site that includes at least one chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii). <i>If the response to Question VIII.B.2 is "NO," go to Section VIII.D.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area is located at a site that includes at least one chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii) and uses as a reactant or manufactures as a product, or co-product, one or more of the organic hazardous air pollutants listed in table 2 of 40 CFR Part 63, Subpart F.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
4. The application area includes a chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii) and uses as a reactant or manufactures as a product, or co-product, one or more of the organic hazardous air pollutants listed in table 2 of 40 CFR Part 63, Subpart F.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes a chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii) and does <u>not</u> use as a reactant or manufacture as a product, or co-product, one or more of the organic hazardous air pollutants listed in table 2 of 40 CFR Part 63, Subpart F. <i>If the response to Questions VIII.B.3, B.4 and B.5 are all "NO," go to Section VIII.D.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>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</b>	
<b>Applicability</b>	
1. The application area is located at a site that is subject to 40 CFR 63, Subpart F and the application area includes process vents, storage vessels, transfer racks, or waste streams associated with a chemical manufacturing process subject to 40 CFR 63, Subpart F. <i>If the response to Question VIII.C.1 is "NO," go to Section VIII.D.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area includes fixed roofs, covers, and/or enclosures that are required to comply with 40 CFR § 63.148.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes vapor collection systems or closed-vent systems that are required to comply with 40 CFR § 63.148. <i>If the response to Question VIII.C.3 is "NO," go to Question VIII.C.8.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes vapor collection systems or closed-vent systems that are constructed of hard-piping.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes vapor collection systems or closed-vent systems that contain bypass lines that could divert a vent stream away from a control device and to the atmosphere. <i>If the response to Question VIII.C.5 is "NO," go to Question VIII.C.8.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Vapor Collection and Closed Vent Systems</b>	
6. Flow indicators are installed, calibrated, maintained, and operated at the entrances to bypass lines in the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. Bypass lines in the application area are secured in the closed position with a car-seal or a lock-and-key type configuration.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 36</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>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)</b>	
<b>Reloading or Cleaning of Railcars, Tank Trucks, or Barges</b>	
8. The application area includes reloading and/or cleaning of railcars, tank trucks, or barges that deliver HAPs to a storage tank. <i>If the response to Question VIII.C.8 is "NO," go to Question VIII.C.11.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. The application area includes operations that are complying with § 63.119(g)(6) through the use of a closed-vent system with a control device used to reduce inlet emissions of HAPs by at least 95 percent by weight or greater.	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The application area includes operations that are complying with § 63.119(g)(6) through the use of a vapor balancing system.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Transfer Racks</b>	
11. The application area includes Group 1 transfer racks that load organic HAPs.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Process Wastewater Streams</b>	
12. The application area includes process wastewater streams. <i>If the response to Question VIII.C.12 is "NO," go to Question VIII.C.34.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
13. The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Part 61, Subpart FF. <i>If the response to Question VIII.C.13 is "NO," go to Question VIII.C.15.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
14. The application area includes process wastewater streams that are complying with 40 CFR §§ 63.110(e)(1)(i) and (e)(1)(ii).	<input type="checkbox"/> YES <input type="checkbox"/> NO
15. The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Part 61, Subpart F. <i>If the response to Question VIII.C.15 is "NO," go to Question VIII.C.17.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 37</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>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)</b>	
<b>Process Wastewater Streams (continued)</b>	
16. The application area includes process wastewater streams utilizing the compliance option specified in 40 CFR § 63.110(f)(4)(ii).	<input type="checkbox"/> YES <input type="checkbox"/> NO
17. The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Parts 260 through 272. <i>If the response to Question VIII.C.17 is "NO," go to Question VIII.C.20.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
18. The application area includes process wastewater streams complying with 40 CFR § 63.110(e)(2)(i).	<input type="checkbox"/> YES <input type="checkbox"/> NO
19. The application are includes process wastewater streams complying with 40 CFR § 63.110(e)(2)(ii).	<input type="checkbox"/> YES <input type="checkbox"/> NO
20. The application area includes process wastewater streams, located at existing sources, that are designated as Group 1; are required to be treated as Group 1 under 40 CFR § 63.110; or are determined to be Group 1 for Table 9 compounds.	<input type="checkbox"/> YES <input type="checkbox"/> NO
21. The application area includes process wastewater streams, located at existing sources that are Group 2.	<input type="checkbox"/> YES <input type="checkbox"/> NO
22. The application area includes process wastewater streams, located at new sources, that are designated as Group 1; required to be treated as Group 1 under 40 CFR § 63.110; or are determined to be Group 1 for Table 8 or Table 9 compounds.	<input type="checkbox"/> YES <input type="checkbox"/> NO
23. The application area includes process wastewater streams, located at new sources that are Group 2 for both Table 8 and Table 9 compounds.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>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)</b>	
<b>Process Wastewater Streams (continued)</b>	
24. All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.C.24 is "YES," go to Question VIII.C.34.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
25. The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.C.25 is "NO," go to Question VIII.C.27.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
26. The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	<input type="checkbox"/> YES <input type="checkbox"/> NO
27. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	<input type="checkbox"/> YES <input type="checkbox"/> NO
28. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.C.27 - VIII.C.28 are both "NO," go to Question VIII.C.30.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
29. The application area includes waste management units that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	<input type="checkbox"/> YES <input type="checkbox"/> NO
30. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 39</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>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)</b>	
<b>Drains</b>	
31. The application area includes individual drain systems that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream. <i>If the response to Question VIII.C.31 is "NO," go to Question VIII.C.34.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
32. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	<input type="checkbox"/> YES <input type="checkbox"/> NO
33. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	<input type="checkbox"/> YES <input type="checkbox"/> NO
34. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of a chemical manufacturing process unit that meets the criteria of 40 CFR § 63.100(b). <i>If the response to Question VIII.C.34 is "NO," go to Question VIII.C.39.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
35. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes (that are part of a chemical manufacturing process unit) that meet the criteria listed in 40 CFR § 63.149(d). <i>If the response to Question VIII.C.35 is "NO," go to Question VIII.C.39.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
36. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds listed in 40 CFR Part 63 Subpart G, Table 9, at any flow rate.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>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)</b>	
<b>Drains (continued)</b>	
37. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds listed in 40 CFR Part 63 Subpart G, Table 9, at an annual average flow rate greater than or equal to 10 liters per minute.	<input type="checkbox"/> YES <input type="checkbox"/> NO
38. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of a chemical manufacturing process unit that is subject to the new source requirements of 40 CFR § 63.100(l)(1) or (l)(2); and the equipment conveys water with a total annual average concentration greater than or equal to 10 parts per million by weight of compounds listed in 40 CFR Part 63 Subpart G, Table 8, at an average annual flow rate greater than or equal to 0.02 liter per minute.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Gas Streams</b>	
39. The application area includes gas streams meeting the characteristics of 40 CFR § 63.107(b) - (h) or the criteria of 40 CFR § 63.113(i) and are transferred to a control device not owned or operated by the applicant.	<input type="checkbox"/> YES <input type="checkbox"/> NO
40. The applicant is unable to comply with 40 CFR §§ 63.113 - 63.118 for one or more reasons described in 40 CFR § 63.100(q)(1), (3), or (5).	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>D. Subpart N - National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks</b>	
1. The application area includes chromium electroplating or chromium anodizing tanks located at hard chromium electroplating, decorative chromium electroplating, and/or chromium anodizing operations.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>E. Subpart O - Ethylene Oxide Emissions Standards for Sterilization Facilities</b>	
1. The application area includes sterilization facilities where ethylene oxide is used in the sterilization or fumigation of materials. <i>If the response to Question VIII.E.1 is "NO," go to Section VIII.F.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. Sterilization facilities located in the application area are subject to 40 CFR Part 63, Subpart O. <i>If the response to Question VIII.E.2 is "NO," go to Section VIII.F.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The sterilization source has used less than 1 ton (907 kg) of ethylene oxide within all consecutive 12-month periods after December 6, 1996.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The sterilization source has used less than 10 tons (9070 kg) of ethylene oxide within all consecutive 12-month periods after December 6, 1996.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>F. Subpart Q - National Emission Standards for Industrial Process Cooling Towers</b>	
1. The application area includes industrial process cooling towers. <i>If the response to Question VIII.F.1 is "NO," go to Section VIII.G.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. Chromium-based water treatment chemicals have been used on or after September 8, 1994.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>G. Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)</b>	
1. The application area includes a bulk gasoline terminal.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes a pipeline breakout station. <i>If the responses to Questions VIII.G.1 and VIII.G.2 are both "NO," go to Section VIII.H.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The bulk gasoline terminal or pipeline breakout station is located within a contiguous area and under common control with another bulk gasoline terminal or a pipeline breakout station. <i>If the response to Question VIII.G.3 is "YES," go to Question VIII.G.10.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO



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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>G. Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) (continued)</b>	
4. The bulk gasoline terminal or pipeline breakout station is located within a contiguous area and under common control with sources, other than bulk gasoline terminals or pipeline breakout stations that emit or have the potential to emit HAPs. <i>If the response to Question VIII.G.4 is "YES," go to Question VIII.G.10.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. An emissions screening factor was calculated for the bulk gasoline terminal or pipeline breakout station. <i>If the response to Question VIII.G.5 is "NO," go to Question VIII.G.10.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The value 0.04(OE) is less than 5% of the value of the bulk gasoline terminal emissions screening factor (ET) or the pipeline breakout station emissions screening factor (Ep). <i>If the response to Question VIII.G.6 is "NO," go to Question VIII.G.10.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. Emissions screening factor less than 0.5 (ET or EP < 0.5). <i>If the response to Question VIII.G.7 is "YES," go to Section VIII.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. Emissions screening factor greater than or equal to 0.5, but less than 1.0 ( $0.5 \leq ET$ or $EP < 1.0$ ). <i>If the response to Question VIII.G.8 is "YES," go to Section VIII.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. Emissions screening factor greater than or equal to 1.0 (ET or EP $\geq 1.0$ ). <i>If the response to Question VIII.G.9 is "YES," go to Question VIII.G.11.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The site at which the application area is located is a major source of HAP. <i>If the response to Question VIII.G.10 is "NO," go to Section VIII.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
11. The application area is using an alternative leak monitoring program as described in 40 CFR § 63.424(f).	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>H. Subpart S - National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry</b>	
1. The application area includes processes that produce pulp, paper, or paperboard and are located at a plant site that is a major source of HAPs as defined in 40 CFR § 63.2. <i>If the response to Question VIII.H.1 is "NO," go to Section VIII.I.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area uses processes and materials specified in 40 CFR § 63.440(a)(1) - (3). <i>If the response to Question VIII.H.2 is "NO," go to Section VIII.I.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes one or more sources subject to 40 CFR Part 63, Subpart S that are existing sources. <i>If the response to Question VIII.H.3 is "NO," go to Section VIII.I.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes one or more kraft pulping systems that are existing sources.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes one or more dissolving-grade bleaching systems that are existing sources at a kraft or sulfite pulping mill.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes bleaching systems that are existing sources and are complying with the Voluntary Advanced Technology Incentives Program for Effluent Limitation Guidelines in 40 CFR § 430.24. <i>If the response to Question VIII.H.6 is "NO," go to Section VIII.I.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes bleaching systems that are complying with 40 CFR § 63.440(d)(3)(i).	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. The application area includes bleaching systems that are complying with 40 CFR § 63.440(d)(3)(ii).	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>I. Subpart T - National Emission Standards for Halogenated Solvent Cleaning</b>	
1. The application area includes an individual batch vapor, in-line vapor, in-line cold, and/or batch cold solvent cleaning machine that uses a hazardous air pollutant (HAP) solvent, or any combination of halogenated HAP solvents, in a total concentration greater than 5% by weight, as a cleaning and/or drying agent.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area is located at a major source and includes solvent cleaning machines, qualifying as affected facilities, that use perchloroethylene, trichloroethylene or methylene chloride.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area is located at an area source and includes solvent cleaning machines, other than cold batch cleaning machines, that use perchloroethylene, trichloroethylene or methylene chloride.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins</b>	
1. The application area includes elastomer product process units and/or wastewater streams and wastewater operations that are associated with elastomer product process units. <i>If the response to Question VIII.J.1 is "NO," go to Section VIII.K.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. Elastomer product process units and/or wastewater streams and wastewater operations located in the application area are subject to 40 CFR Part 63, Subpart U. <i>If the response to Question VIII.J.2 is "NO," go to Section VIII.K.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 for organic HAPs as defined in 40 CFR § 63.482.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes process wastewater streams that are Group 2 for organic HAPs as defined in 40 CFR § 63.482.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins (continued)</b>	
5. All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.J.5 is "YES," go to Question VIII.J.15.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.J.6 is "NO," go to Question VIII.J.8.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.J.8 - VIII.J.9 are both "NO," go to Question VIII.J.11.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 46</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins (continued)</b>	
<b>Containers</b>	
11. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Drains</b>	
12. The application area includes individual drain systems that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. <i>If the response to Question VIII.J.12 is "NO," go to Question VIII.J.15.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
13. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	<input type="checkbox"/> YES <input type="checkbox"/> NO
14. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	<input type="checkbox"/> YES <input type="checkbox"/> NO
15. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of an elastomer product process unit. <i>If the response to Question VIII.J.15 is "NO," go to Section VIII.K.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
16. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that meet the criteria listed in 40 CFR § 63.149(d) and § 63.501(a)(12). <i>If the response to Question VIII.J.16 is "NO," go to Section VIII.K.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 47</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins (continued)</b>	
<b>Drains (continued)</b>	
17. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.482, at any flow rate.	<input type="checkbox"/> YES <input type="checkbox"/> NO
18. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.482, at an annual average flow rate greater than or equal to 10 liters per minute.	<input type="checkbox"/> YES <input type="checkbox"/> NO
19. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of an elastomer product process unit that is a new affected source or part of a new affected source and the equipment conveys water with a total annual average concentration greater than or equal to 10 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.482, at an average annual flow rate greater than or equal to 0.02 liter per minute.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>K. Subpart W - National Emission Standards for Hazardous Air Pollutants for Epoxy Resins Production and Non-nylon Polyamides Production</b>	
1. The manufacture of basic liquid epoxy resins (BLR) and/or manufacture of wet strength resins (WSR) is conducted in the application area. <i>If the response to Question VIII.K.1 is "NO" or "N/A," go to Section VIII.L.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area includes a BLR and/or WSR research and development facility.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 48</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>L. Subpart X - National Emission Standards for Hazardous Air Pollutants from Secondary Lead Smelting</b>	
1. The application area includes one or more of the affected sources in 40 CFR § 63.541(a) that are located at a secondary lead smelter. <i>If the response to Question VIII.L.1 is "NO" or "N/A," go to Section VIII.M.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area is using and approved alternate to the requirements of § 63.545(c)(1)-(5) for control of fugitive dust emission sources.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>M. Subpart Y - National Emission Standards for Marine Tank Vessel Loading Operations</b>	
1. The application area includes marine tank vessel loading operations that are specified in 40 CFR § 63.560 and located at an affected source as defined in 40 CFR § 63.561.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>N. Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries</b>	
<b>Applicability</b>	
1. The application area includes petroleum refining process units and/or related emission points that are specified in 40 CFR § 63.640(c)(1) - (c)(7). <i>If the response to Question VIII.N.1 is "NO," go to Section VIII.O.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. All petroleum refining process units/and or related emission points within the application area are specified in 40 CFR § 63.640(g)(1) - (g)(7). <i>If the response to Question VIII.N.2 is "YES," go to Section VIII.O.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 49</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>N. Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries (continued)</b>	
<b>Applicability (continued)</b>	
3. The application area is located at a plant site that is a major source as defined in the Federal Clean Air Act § 112(a). <i>If the response to Question VIII.N.3 is "NO," go to Section VIII.O.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area is located at a plant site which emits or has equipment containing/contacting one or more of the HAPs listed in table 1 of 40 CFR Part 63, Subpart CC. <i>If the response to Question VIII.N.4 is "NO," go to Section VIII.O.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes Group 1 wastewater streams that are not conveyed, stored, or treated in a wastewater stream management unit that also receives streams subject to the provisions of 40 CFR §§ 63.133 - 63.147 of Subpart G wastewater provisions section.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes Group 2 wastewater streams that are not conveyed, stored, or treated in a wastewater stream management unit that also receives streams subject to the provisions of 40 CFR §§ 63.133 - 63.147 of Subpart G wastewater provisions section.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes Group 1 or Group 2 wastewater streams that are conveyed, stored, or treated in a wastewater stream management unit that also receives streams subject to the provisions of 40 CFR §§ 63.133 - 63.147 of Subpart G wastewater provisions section. <i>If the response to Question VIII.N.7 is "NO," go to Section VIII.O.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. The application area includes Group 1 or Group 2 wastewater streams that are complying with 40 CFR § 63.640(o)(2)(i).	<input type="checkbox"/> YES <input type="checkbox"/> NO



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<b>Form OP-REQ1: Page 50</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>N. Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries (continued)</b>	
<b>Applicability (continued)</b>	
9. The application area includes Group 1 or Group 2 wastewater streams that are complying with 40 CFR § 63.640(o)(2)(ii). <i>If the response to Question VIII.N.9 is "NO," go to Section VIII.O.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The application area includes Group 2 wastewater streams or organic streams whose benzene emissions are subject to control through the use of one or more treatment processes or waste management units under the provisions of 40 CFR Part 61, Subpart FF on or after December 31, 1992.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Containers, Drains, and other Appurtenances</b>	
11. The application area includes containers that are subject to the requirements of 40 CFR § 63.135 as a result of complying with 40 CFR § 63.640(o)(2)(ii).	<input type="checkbox"/> YES <input type="checkbox"/> NO
12. The application area includes individual drain systems that are subject to the requirements of 40 CFR § 63.136 as a result of complying with 40 CFR § 63.640(o)(2)(ii).	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>O. Subpart DD - National Emission Standards for Off-site Waste and Recovery Operations</b>	
1. The application area receives material that meets the criteria for off-site material as specified in 40 CFR § 63.680(b)(1). <i>If the response to Question VIII.O.1 is "NO" or "N/A," go to Section VIII.P</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. Materials specified in 40 CFR § 63.680(b)(2) are received at the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area has a waste management operation receiving off-site material and is regulated under 40 CFR Part 264 or Part 265.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 51</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>O. Subpart DD - National Emission Standards for Off-site Waste and Recovery Operations (continued)</b>	
4. The application area has a waste management operation treating wastewater which is an off-site material and is exempted under 40 CFR §§ 264.1(g)(6) or 265.1(c)(10).	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area has an operation subject to Clean Water Act, § 402 or § 307(b) but is not owned by a "state" or "municipality."	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The predominant activity in the application area is the treatment of wastewater received from off-site.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area has a recovery operation that recycles or reprocesses hazardous waste which is an off-site material and is exempted under 40 CFR §§ 264.1(g)(2) or 265.1(c)(6).	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. The application area has a recovery operation that recycles or reprocesses used solvent which is an off-site material and is not part of a chemical, petroleum, or other manufacturing process that is required to use air emission controls by another subpart of 40 CFR Part 63 or Part 61.	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. The application area has a recovery operation that re-refines or reprocesses used oil which is an off-site material and is regulated under 40 CFR Part 279, Subpart F (Standards for Used Oil Processors and Refiners).	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The application area is located at a site where the total annual quantity of HAPs in the off-site material is less than 1 megagram per year. <i>If the response to Question VIII.O.10 is "YES," go to Section VIII.P.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 52</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>O. Subpart DD - National Emission Standards for Off-site Waste and Recovery Operations (continued)</b>	
11. The application area receives offsite materials with average VOHAP concentration less than 500 ppmw at the point of delivery that are not combined with materials having a VOHAP concentration of 500 ppmw or greater. <i>If the response to Question VIII.O.11 is "NO," go to Question VIII.O.14.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
12. VOHAP concentration is determined by direct measurement.	<input type="checkbox"/> YES <input type="checkbox"/> NO
13. VOHAP concentration is based on knowledge of the off-site material.	<input type="checkbox"/> YES <input type="checkbox"/> NO
14. The application area includes an equipment component that is a pump, compressor, and agitator, pressure relief device, sampling connection system, open-ended valve or line, valve, connector or instrumentation system. <i>If the response to Question VIII.O.14 is "NO," go to Question VIII.O.17.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
15. An equipment component in the application area contains or contacts off-site material with a HAP concentration greater than or equal to 10% by weight.	<input type="checkbox"/> YES <input type="checkbox"/> NO
16. An equipment component in the application area is intended to operate 300 hours or more during a 12-month period.	<input type="checkbox"/> YES <input type="checkbox"/> NO
17. The application area includes containers that manage non-exempt off-site material.	<input type="checkbox"/> YES <input type="checkbox"/> NO
18. The application area includes individual drain systems that manage non-exempt off-site materials.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 53</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>P. Subpart GG - National Emission Standards for Aerospace Manufacturing and Rework Facilities</b>	
1. The application area includes facilities that manufacture or rework commercial, civil, or military aerospace vehicles or components. <i>If the response to Question VIII.P.1 is "NO" or "N/A," go to Section VIII.Q.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area includes one or more of the affected sources specified in 40 CFR § 63.741(c)(1) - (7).	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Q. Subpart HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities.</b>	
1. The application area contains facilities that process, upgrade or store hydrocarbon liquids that are located at oil and natural gas production facilities prior to the point of custody transfer.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area contains facilities that process, upgrade or store natural gas prior to the point at which natural gas enters the natural gas transmission and storage source category or is delivered to a final end user. <i>For SOP applications, if the responses to Questions VIII.Q.1 and VIII.Q.2 are both "NO," go to Section VIII.R.</i> <i>For GOP applications, if the responses to Questions VIII.Q.1 and VIII.Q.2 are both "NO," go to Section VIII.Z.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area contains only facilities that exclusively process, store or transfer black oil as defined in § 63.761. <i>For SOP applications, if the response to Question VIII.Q.3 is "YES," go to Section VIII.R.</i> <i>For GOP applications, if the response to Question VIII.Q.3 is "YES," go to Section VIII.Z.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area is located at a site that is a major source of HAP. <i>If the response to Question VIII.Q.4 is "NO," go to Question VIII.Q.6.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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**VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)**

**Q. Subpart - HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities (continued)**

5. 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 <sup>3</sup> ) per day and a facility-wide actual annual average hydrocarbon liquid throughput less than 39,700 liters (10,487.6 gallons) per day. <i>For SOP applications, if the response to Question VIII.Q.5 is "YES," go to Section VIII.R.</i> <i>For GOP applications, if the response to Question VIII.Q.5 is "YES," go to Section VIII.Z.</i> <i>For all applications, if the response to Question VIII.Q.5 is "NO," go to Question VIII.Q.9.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes a triethylene glycol (TEG) dehydration unit. <i>For SOP applications, if the answer to Question VIII.Q.6 is "NO," go to Section VIII.R. For GOP applications, if the response to Question VIII.Q.6 is "NO," go to Section VIII.Z.</i>	<input type="checkbox"/> YES <input type="checkbox"/> 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.	<input type="checkbox"/> YES <input type="checkbox"/> 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.	<input type="checkbox"/> YES <input type="checkbox"/> 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).	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 55</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>R. Subpart II - National Emission Standards for Shipbuilding and Ship Repair (Surface Coating)</b>	
1. The application area includes shipbuilding or ship repair operations. <i>If the response to Question VIII.R.1 is "NO," go to Section VIII.S.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. Shipbuilding or ship repair operations located in the application area are subject to 40 CFR Part 63, Subpart II.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>S. Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations</b>	
1. The application area includes wood furniture manufacturing operations and/or wood furniture component manufacturing operations. <i>If the response to Question VIII.S.1 is "NO" or "N/A," go to Section VIII.T.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area meets the definition of an "incidental wood manufacturer" as defined in 40 CFR § 63.801.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>T. Subpart KK - National Emission Standards for the Printing and Publishing Industry</b>	
1. The application area includes publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
<b>U. Subpart PP - National Emission Standards for Containers</b>	
1. The application area includes containers for which another 40 CFR Part 60, 61, or 63 subpart references the use of 40 CFR Part 63, Subpart PP for the control of air emissions. <i>If the response to Question VIII.U.1 is "NO," go to Section VIII.V.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes containers using Container Level 1 controls.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes containers using Container Level 2 controls.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>U. Subpart PP - National Emission Standards for Containers (continued)</b>	
4. The application area includes containers using Container Level 3 controls.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>V. Subpart RR - National Emission Standards for Individual Drain Systems</b>	
1. The application area includes individual drain systems for which another 40 CFR Part 60, 61, or 63 subpart references the use of 40 CFR Part 63, Subpart RR for the control of air emissions.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards</b>	
1. The application area includes an acetal resins production process unit; an acrylic and modacrylic fiber production process unit complying with 40 CFR § 63.1103(b)(3)(i); or an existing polycarbonate production process.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes process wastewater streams generated from an acetal resins production process unit; an acrylic and modacrylic fiber production process unit complying with 40 CFR § 63.1103(b)(3)(i); or an existing polycarbonate production process. <i>If the responses to Questions VIII.W.1 and VIII.W.2 are both "NO," go to Question VIII.W.20.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 under the requirements of 40 CFR § 63.132(c).	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes process wastewater streams that are determined to be Group 2 under the requirements of 40 CFR § 63.132(c).	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. All Group 1 wastewater streams at the site are determined to have a total source mass flow rate of less than 1 MG/yr.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.W.6 is "NO," go to Question VIII.W.8.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)</b>	
7. The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.W.8 and W.9 are both "NO," go to Question VIII.W.11.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	<input type="checkbox"/> YES <input type="checkbox"/> NO
11. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	<input type="checkbox"/> YES <input type="checkbox"/> NO
12. The application area includes individual drain systems that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. <i>If the response to Question VIII.W.12 is "NO," go to Question VIII.W.15.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
13. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of covers and, if vented, closed vent systems and control devices.	<input type="checkbox"/> YES <input type="checkbox"/> NO
14. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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<b>Form OP-REQ1: Page 58</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)</b>	
15. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of an acetal resins production process unit; an acrylic and modacrylic fiber production process unit complying with 40 CFR § 63.1103(b)(3)(i); or an existing polycarbonate production process unit. <i>If the response to Question VIII.W.15 is "NO," go to Question VIII.W.20.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
16. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that meet the criteria listed in 40 CFR § 63.1106(c)(1) - (3). <i>If the response to Question VIII.W.16 is "NO," go to Question VIII.W.20.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
17. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds meeting the definition of organic HAP in Table 9 to 40 CFR Part 60, Subpart G, at any flow rate.	<input type="checkbox"/> YES <input type="checkbox"/> NO
18. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds meeting the definition of organic HAP in Table 9 to 40 CFR Part 60, Subpart G, at an annual average flow rate greater than or equal to 10 liters per minute.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 59</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)</b>	
19. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of an acrylic resins or acrylic and modacrylic fiber production process unit that is part of a new affected source or is a new affected source and the equipment conveys water with a total annual average concentration greater than or equal to 10 ppmw of compounds meeting the definition of organic HAP in Table 9 to 40 CFR Part 60, Subpart G, at an average annual flow rate greater than or equal to 0.02 liter per minute.	<input type="checkbox"/> YES <input type="checkbox"/> NO
20. The application area includes an ethylene production process unit.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
21. The application area includes waste streams generated from an ethylene production process unit. <i>If the responses to Questions VIII.W.20 and VIII.W.21 are both "NO" or "N/A," go to Question VIII.W.54.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
22. The waste stream(s) contains at least one of the chemicals listed in 40 CFR § 63.1103(e), Table 7(g)(1). <i>If the response to Question VIII.W.22 is "NO," go to Question VIII.W.54.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
23. Waste stream(s) are transferred off-site for treatment. <i>If the response to Question VIII.W.23 is "NO," go to Question VIII.W.25.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
24. The application area has waste management units that treat or manage waste stream(s) prior to transfer off-site for treatment. <i>If the response to Question VIII.W.24 is "NO," go to Question VIII.W.54.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)</b>	
25. The total annual benzene quantity from waste at the site is less than 10 Mg/yr as determined according to 40 CFR § 61.342(a).	<input type="checkbox"/> YES <input type="checkbox"/> NO
26. The application area contains at least one waste stream that is a continuous butadiene waste stream as defined in 40 CFR § 63.1082(b). <i>If the response to Question VIII.W.26 is "NO," go to Question VIII.W.43.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
27. The waste stream(s) contains at least 10 ppmw 1, 3-butadiene at a flow rate of 0.02 liters per minute or is designated for control. <i>If the response to Question VIII.W.27 is "NO," go to Question VIII.W.43.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
28. The control requirements of 40 CFR Part 63, Subpart G for process wastewater as specified in 40 CFR § 63.1095(a)(2) are selected for control of the waste stream(s). <i>If the response to Question VIII.W.28 is "NO," go to Question VIII.W.33.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
29. The application area includes containers that receive, manage, or treat a continuous butadiene waste stream.	<input type="checkbox"/> YES <input type="checkbox"/> NO
30. The application area includes individual drain systems that receive, manage, or treat a continuous butadiene waste stream. <i>If the response to Question VIII.W.30 is "NO," go to Question VIII.W.43.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
31. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 61</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)</b>	
32. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs. <i>If the response to Question VIII.W.32 is required, go to Question VIII.W.43.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
33. The application area has containers, as defined in 40 CFR § 61.341, that receive a continuous butadiene waste stream. <i>If the response to Question VIII.W.33 is "NO," go to Question VIII.W.36.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
34. The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers. <i>If the response to Question VIII.W.34 is "YES," go to Question VIII.W.36.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
35. Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	<input type="checkbox"/> YES <input type="checkbox"/> NO
36. The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage a continuous butadiene waste stream. <i>If the response to Question VIII.W.36 is "NO," go to Question VIII.W.43.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
37. The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. <i>If the response to Question VIII.W.37 is "YES," go to Question VIII.W.43.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 62</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)</b>	
38. The application area has individual drain systems complying with 40 CFR § 61.346(a). <i>If the response to Question VIII.W.38 is "NO," go to Question VIII.W.40.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
39. Covers and closed-vent systems used for individual drain systems operate such that the individual drain system is maintained at a pressure less than atmospheric pressure.	<input type="checkbox"/> YES <input type="checkbox"/> NO
40. The application area has individual drain systems complying with 40 CFR § 61.346(b). <i>If the response to Question VIII.W.40 is "NO," go to Question VIII.W.43.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
41. Junction boxes in the individual drain systems are equipped with a system to prevent the flow of organic vapors from the junction box vent pipe to the atmosphere during normal operation.	<input type="checkbox"/> YES <input type="checkbox"/> NO
42. Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device.	<input type="checkbox"/> YES <input type="checkbox"/> NO
43. The application area has at least one waste stream that contains benzene. <i>If the response to Question VIII.W.43 is "NO," go to Question VIII.W.54.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
44. The application area has containers, as defined in 40 CFR § 61.341, that receive a waste stream containing benzene. <i>If the response to Question VIII.W.44 is "NO," go to Question VIII.W.47.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
45. The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers. <i>If the response to Question VIII.W.45 is "YES," go to Question VIII.W.47.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 63</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)</b>	
46. Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	<input type="checkbox"/> YES <input type="checkbox"/> NO
47. The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage a waste stream containing benzene. <i>If the response to Question VIII.W.47 is "NO," go to Question VIII.W.54.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
48. The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. <i>If the response to Question VIII.W.48 is "YES," go to Question VIII.W.54.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
49. The application area has individual drain systems complying with 40 CFR § 61.346(a). <i>If the response to Question VIII.W.49 is "NO," go to Question VIII.W.51.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
50. Covers and closed-vent systems used for individual drain systems operate such that the individual drain system is maintained at a pressure less than atmospheric pressure.	<input type="checkbox"/> YES <input type="checkbox"/> NO
51. The application area has individual drain systems complying with 40 CFR § 61.346(b). <i>If the response to Question VIII.W.51 is "NO," go to Question VIII.W.54.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
52. Junction boxes in the individual drain systems are equipped with a system to prevent the flow of organic vapors from the junction box vent pipe to the atmosphere during normal operation.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 64</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)</b>	
53. Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device.	<input type="checkbox"/> YES <input type="checkbox"/> NO
54. The application area contains a cyanide chemicals manufacturing process. <i>If the response to Question VIII.W.54 is "NO," go to Section VIII.X.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
55. The cyanide chemicals manufacturing process generates maintenance wastewater containing hydrogen cyanide or acetonitrile.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>X. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins</b>	
1. The application area includes thermoplastic product process units, and/or their associated affected sources specified in 40 CFR § 63.1310(a)(1) - (5), that are subject to 40 CFR Part 63, Subpart JJJ. <i>If the response to Question VIII.X.1 is "NO," go to Section VIII.Y.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes thermoplastic product process units and/or wastewater streams and wastewater operations that are associated with thermoplastic product process units. <i>If the response to Question VIII.X.2 is "NO," go to Section VIII.Y.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. All process wastewater streams generated or managed in the application area are from sources producing polystyrene. <i>If the response to Question VIII.X.3 is "YES," go to Section VIII.Y.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. All process wastewater streams generated or managed in the application area are from sources producing ASA/AMSAN. <i>If the response to Question VIII.X.4 is "YES," go to Section VIII.Y.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 65</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>X. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins (continued)</b>	
5. The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 for organic HAPs as defined in 40 CFR § 63.1312.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes process wastewater streams, located at existing sources, that are Group 2 for organic HAPs as defined in 40 CFR § 63.1312.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes process wastewater streams, located at new sources, that are Group 2 for organic HAPs as defined in 40 CFR § 63.1312.	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.X.8 is "YES," go to Question VIII.X.18.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.X.9 is "NO," go to Question VIII.X.11.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	<input type="checkbox"/> YES <input type="checkbox"/> NO
11. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	<input type="checkbox"/> YES <input type="checkbox"/> NO
12. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.X.11 - VIII.X.12 are both "NO," go to Question VIII.X.14.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO



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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>X. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins (continued)</b>	
13. The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Containers</b>	
14. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Drains</b>	
15. The application area includes individual drain systems that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. <i>If the response to Question VIII.X.15 is "NO," go to Question VIII.X.18.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
16. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	<input type="checkbox"/> YES <input type="checkbox"/> NO
17. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	<input type="checkbox"/> YES <input type="checkbox"/> NO
18. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of an thermoplastic product process unit. <i>If the response to Question VIII.X.18 is "NO," go to Section VIII.Y.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>X. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins (continued)</b>	
<b>Drains (continued)</b>	
19. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that meet the criteria listed in 40 CFR § 63.149(d) and § 63.1330(b)(12). <i>If the response to Question VIII.X.19 is "NO," go to Section VIII.Y.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
20. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.1312, at any flow rate.	<input type="checkbox"/> YES <input type="checkbox"/> NO
21. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.1312, at an annual average flow rate greater than or equal to 10 liters per minute.	<input type="checkbox"/> YES <input type="checkbox"/> NO
22. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of an thermoplastic product process unit that is a new affected source or part of a new affected source and the equipment conveys water with a total annual average concentration greater than or equal to 10 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.1312, at an average annual flow rate greater than or equal to 0.02 liter per minute	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 68</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>Y. Subpart UUU - National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic reforming Units, and Sulfur Recovery Units.</b>	
1. The application area is subject to 40 CFR Part 63, Subpart UUU - National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic reforming Units, and Sulfur Recovery Units.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>Z. Subpart AAAA - National Emission Standards for Hazardous Air Pollutants for Municipal Solid Waste (MSW) Landfills.</b>	
1. The application area is subject to 40 CFR Part 63, Subpart AAAA - National Emission Standards for Hazardous Air Pollutants for Municipal Solid Waste Landfills.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON)</b>	
1. The application area is located at a site that includes process units that manufacture as a primary product one or more of the chemicals listed in 40 CFR § 63.2435(b)(1).	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area is located at a plant site that is a major source as defined in FCAA § 112(a).	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area is located at a site that includes miscellaneous chemical manufacturing process units (MCPU) that process, use or generate one or more of the organic hazardous air pollutants listed in § 112(b) of the Clean Air Act or hydrogen halide and halogen HAP. <i>If the response to Question VIII.AA.1, AA.2 or AA.3 is "NO," go to Section VIII.BB.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes process vents, storage vessels, transfer racks, or waste streams associated with a miscellaneous chemical manufacturing process subject to 40 CFR 63, Subpart FFFF. <i>If the response to Question VIII.AA.4 is "NO," go to Section VIII.BB.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)</b>	
5. The application area includes process wastewater streams. <i>If the response to Question VIII.AA.5 is "NO," go to Question VIII.AA.18.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
6. The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 for compounds listed in Table 8 of 40 CFR Part 63, Subpart G or Table 8 and Table 9, as appropriate, of 40 CFR Part 63, Subpart FFFF.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes process wastewater streams that are Group 2 for compounds listed in Table 8 or Table 8 and Table 9, as appropriate, of 40 CFR Part 63, Subpart FFFF.	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.AA.8 is "YES," go to Section VIII.AA.22.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.AA.9 is "NO," go to Question VIII.AA.11.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	<input type="checkbox"/> YES <input type="checkbox"/> NO
11. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	<input type="checkbox"/> YES <input type="checkbox"/> NO
12. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.AA.11 and VIII.AA.12 are both "NO," go to Question VIII.AA.18.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 70</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)</b>	
13. Group 1 wastewater streams are transferred to an offsite treatment facility meeting the requirements of 40 CFR § 63.138(h). <i>If the response to Question VIII.AA.13 is "NO," go to Question VIII.AA.15.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
14. The option to document in the notification of compliance status report that the wastewater will be treated in a facility meeting the requirements of 40 CFR § 63.138(h) is elected.	<input type="checkbox"/> YES <input type="checkbox"/> NO
15. Group 1 wastewater streams or residuals with a total annual average concentration of compounds in Table 8 of 40 CFR Part 63, Subpart FFFF less than 50 ppmw are transferred offsite. <i>If the response to Question VIII.AA.15 is "NO," go to Question VIII.AA.17.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
16. The transferor is demonstrating that less than 5 percent of the HAP in Table 9 of 40 CFR Part 63, Subpart FFFF is emitted from waste management units up to the activated sludge unit.	<input type="checkbox"/> YES <input type="checkbox"/> NO
17. The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	<input type="checkbox"/> YES <input type="checkbox"/> NO
18. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
19. The application area includes individual drain systems that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream. <i>If the response to Question VIII.AA.19 is "NO," go to Question VIII.AA.22.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
20. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 71</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)</b>	
21. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	<input type="checkbox"/> YES <input type="checkbox"/> NO
22. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of a chemical manufacturing process unit that meets the criteria of 40 CFR § 63.100(b). <i>If the response to Question VIII.AA.22 is "NO," go to Section VIII.BB.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
23. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes (that are part of a miscellaneous chemical manufacturing process unit) that meet the criteria listed in 40 CFR § 63.149(d). <i>If the response to Question VIII.AA.23 is "NO," go to Section VIII.BB.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
24. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration of compounds in table 8 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 10,000 ppmw at any flow rate, and the total annual load of compounds in table 8 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 200 lb/yr.	<input type="checkbox"/> YES <input type="checkbox"/> NO
25. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration of compounds in table 8 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 1,000 ppmw, and the annual average flow rate is greater than or equal to 1 liter per minute.	<input type="checkbox"/> YES <input type="checkbox"/> NO
26. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of a chemical manufacturing process unit that is subject to the new source requirements of 40 CFR § 63.2445(a); and the equipment conveys water with a combined total annual average concentration of compounds in tables 8 and 9 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 30,000 ppmw, and the combined total annual load of compounds in tables 8 and 9 to this subpart is greater than or equal to 1 tpy.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 72</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)</b>	
<b>BB. Subpart GGGG - National Emission Standards for Hazardous Air Pollutants for: Solvent Extractions for Vegetable Oil Production.</b>	
1. The application area includes a vegetable oil production process that: is by itself a major source of HAP emissions or, is collocated within a plant site with other sources that are individually or collectively a major source of HAP emissions.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>CC. Subpart GGGGG - National Emission Standards for Hazardous Air Pollutants: Site Remediation</b>	
1. The application area includes a facility at which a site remediation is conducted. <i>If the answer to Question VIII.CC.1 is "NO," go to Section VIII.DD.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area is located at a site that is a major source of HAP. <i>If the answer to Question VIII.CC.2 is "NO," go to Section VIII.DD.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
3. All site remediation's qualify for one of the exemptions contained in 40 CFR § 63.7881(b)(1) through (6). <i>If the answer to Question VIII.CC.3 is "YES," go to Section VIII.DD.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
4. Prior to beginning site remediation activities it was determined that the total quantity of HAP listed in Table 1 of Subpart GGGGG that will be removed during all site remediations will be less than 1 Mg/yr. <i>If the answer to Question VIII.CC.4 is "YES," go to Section VIII.DD.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
5. The site remediation will be completed within 30 consecutive calendar days.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
6. No site remediation will exceed 30 consecutive calendar days. <i>If the answer to Question VIII.CC.6 is "YES," go to Section VIII.DD.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
7. Site remediation materials subject to 40 CFR Part 63, Subpart GGGGG are transferred from the application area to an off-site facility.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
8. All site remediation materials subject to 40 CFR Part 63, Subpart GGGGG are transferred from the application area to an off-site facility. <i>If the answer to Question VIII.CC.8 is "YES," go to Section VIII.DD.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 73</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>CC. Subpart GGGGG - National Emission Standards for Hazardous Air Pollutants: Site Remediation (continued)</b>	
9. The application area includes containers that manage site remediation materials subject to 40 CFR Part 63, Subpart GGGGG. <i>If the response to Question VIII.CC.9 is "NO," go to Question VIII.CC.14.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The application area includes containers using Container Level 1 controls as specified in 40 CFR § 63.922(b).	<input type="checkbox"/> YES <input type="checkbox"/> NO
11. The application area includes containers with a capacity greater than 0.46 m <sup>3</sup> that meet the requirements of 40 CFR § 63.7900(b)(3)(i) and (ii).	<input type="checkbox"/> YES <input type="checkbox"/> NO
12. The application area includes containers using Container Level 2 controls as specified in 40 CFR § 63.923(b).	<input type="checkbox"/> YES <input type="checkbox"/> NO
13. The application area includes containers using Container Level 3 controls as specified in 40 CFR § 63.924(b).	<input type="checkbox"/> YES <input type="checkbox"/> NO
14. The application area includes individual drain systems complying with the requirements of 40 CFR § 63.962.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>DD. Subpart YYYYY - National Emission Standards for Hazardous Air Pollutants for Area/Sources: Electric Arc Furnace Steelmaking Facilities</b>	
1. The application area includes an electric arc furnace (EAF) steelmaking facility, and the site is an area source of hazardous air pollutant (HAP) emissions. <i>If the response to Question VIII.DD.1 is "NO," go to Section VIII.EE.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The EAF steelmaking facility is a research and development facility. <i>If the response to Question VIII.DD.2 is "YES," go to Section VIII.EE.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. Metallic scrap is utilized in the EAF.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. Scrap containing motor vehicle scrap is utilized in the EAF.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. Scrap not containing motor vehicle scrap is utilized in the EAF.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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<b>Form OP-REQ1: Page 74</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>EE. Subpart BBBBBB - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities</b>	
1. The application area is located at a site that is an area source of HAPs. <i>If the answer to Question EE.1 is "NO," go to Section VIII.FF.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes a pipeline breakout station, as defined in 40 CFR Part 63, Subpart BBBBBB, not subject to the control requirements of 40 CFR Part 63, Subpart R.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes a pipeline pumping station as defined in 40 CFR Part 63, Subpart BBBBBB.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes a bulk gasoline plant as defined in 40 CFR Part 63, Subpart BBBBBB. <i>If the answer to Question VIII.EE.4 is "NO," go to Question VIII.EE.6.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The bulk gasoline plant was operating, prior to January 10, 2010, in compliance with an enforceable State, local or tribal rule or permit that requires submerged fill as specified in 40 CFR § 63.11086(a).	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes a bulk gasoline terminal, as defined in 40 CFR Part 63, Subpart BBBBBB, not subject to the control requirements of 40 CFR Part 63, Subpart R or Subpart CC. <i>If the answer to Question VIII.EE.6 is "NO," go to Section VIII.FF.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The bulk gasoline terminal has throughput of less than 250,000 gallons per day. <i>If the answer to Question VIII.EE.7 is "YES," go to Section VIII.FF.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. The bulk gasoline terminal loads gasoline into gasoline cargo tanks other than railcar cargo tanks.	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. The bulk gasoline terminal loads gasoline into railcar cargo tanks. <i>If the answer to Question VIII.EE.9 is "NO," go to Section VIII.FF.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The bulk gasoline terminal loads gasoline into railcar cargo tanks which do not collect vapors from a vapor balance system.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>EE. Subpart BBBBBB - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities (continued)</b>	
11. The bulk gasoline terminal loads gasoline into railcar cargo tanks which collect vapors from a vapor balance system and that system complies with a Federal, State, local, tribal rule or permit.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>FF. Subpart CCCCCC - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities</b>	
1. The application area is located at a site that is an area source of hazardous air pollutants. <i>If the answer to Question VIII.FF.1 is "NO," go to Section VIII.GG.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes at least one gasoline dispensing facility as defined in 40 CFR § 63.11132. <i>If the answer to Question VIII.FF.2 is "NO," go to Section VIII.GG.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes at least one gasoline dispensing facility with a monthly throughput of less than 10,000 gallons.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes at least one gasoline dispensing facility where gasoline is dispensed from a fixed gasoline storage tank into a portable gasoline tank for the on-site delivery and subsequent dispensing into other gasoline-fueled equipment.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>GG. Recently Promulgated 40 CFR Part 63 Subparts</b>	
1. The application area is subject to one or more promulgated 40 CFR Part 63 subparts not addressed on this form. <i>If the response to Question VIII.GG.1 is "NO," go to Section IX. A list of promulgated 40 CFR Part 63 subparts not otherwise addressed on OP-REQ1 is included in the instructions.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. Provide the Subpart designation (i.e. Subpart EEE) in the space provided below.	
<b>40 CFR Part 63, Subpart FFFF (MON)</b>	

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<b>IX. Title 40 Code of Federal Regulations Part 68 (40 CFR Part 68) - Chemical Accident Prevention Provisions</b>	
<b>A. Applicability</b>	
1. The application area contains processes subject to 40 CFR Part 68, Chemical Accident Prevention Provisions, and specified in 40 CFR § 68.10.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
<b>X. Title 40 Code of Federal Regulations Part 82 (40 CFR Part 82) - Protection of Stratospheric Ozone</b>	
<b>A. Subpart A - Production and Consumption Controls</b>	
1. The application area is located at a site that produces, transforms, destroys, imports, or exports a controlled substance or product.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
<b>B. Subpart B - Servicing of Motor Vehicle Air Conditioners</b>	
1. Servicing, maintenance, and/or repair of fleet vehicle air conditioning systems using ozone-depleting refrigerants is conducted in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>C. Subpart C - Ban on Nonessential Products Containing Class I Substances and Ban on Nonessential Products Containing or Manufactured with Class II Substances</b>	
1. The application area sells or distributes one or more nonessential products (which release a Class I or Class II substance) that are subject to 40 CFR Part 82, Subpart C.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
<b>D. Subpart D - Federal Procurement</b>	
1. The application area is owned/operated by a department, agency, or instrumentality of the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
<b>E. Subpart E - The Labeling of Products Using Ozone Depleting Substances</b>	
1. The application area includes containers in which a Class I or Class II substance is stored or transported prior to the sale of the Class I or Class II substance to the ultimate consumer.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area is a manufacturer, importer, wholesaler, distributor, or retailer of products containing a Class I or Class II substance.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
3. The application area is a manufacturer, importer, wholesaler, distributor, or retailer of products manufactured with a process that uses a Class I or Class II substance.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A

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<b>X. Title 40 Code of Federal Regulations Part 82 (40 CFR Part 82) - Protection of Stratospheric Ozone (continued)</b>	
<b>F. Subpart F - Recycling and Emissions Reduction</b>	
1. Servicing, maintenance, and/or repair on refrigeration and non-motor vehicle air condition appliances using ozone-depleting refrigerants or non-exempt substitutes is conducted in the application area.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. Disposal of appliances (including motor vehicle air conditioners) or refrigerant or non-exempt substitute reclamation occurs in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
3. The application area manufactures appliances or refrigerant recycling and recovery equipment.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
<b>G. Subpart G - Significant New Alternatives Policy Program</b>	
1. The application area manufactures, formulates, or creates chemicals, product substitutes, or alternative manufacturing processes that are intended for use as a replacement for a Class I or Class II compound. <i>If the response to Question X.G.1 is "NO" or "N/A," go to Section X.H.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. All substitutes produced by the application area meet one or more of the exemptions in 40 CFR § 82.176(b)(1) - (7).	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
<b>H. Subpart H -Halon Emissions Reduction</b>	
1. Testing, servicing, maintaining, repairing, or disposing of equipment containing halons is conducted in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. Disposal of halons or manufacturing of halon blends is conducted in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
<b>XI. Miscellaneous</b>	
<b>A. Requirements Reference Tables (RRT) and Flowcharts</b>	
1. The application area contains units that are potentially subject to a regulation for which the TCEQ has not developed an RRT and flowchart.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

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<b>XI. Miscellaneous (continued)</b>	
<b>B. Forms</b>	
1. The application area contains units that are potentially subject to a regulation for which the TCEQ has not developed a unit attribute form. <i>If the response to Question XI.B.1 is "NO" or "N/A," go to Section XI.C.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
2. Provide the Part and Subpart designation for the federal rule(s) or the Chapter, Subchapter, and Division designation for the State regulation(s) in the space provided below.  <b>40 CFR Part 63, Subpart FFFF (MON)</b>	
<b>C. Emission Limitation Certifications</b>	
1. The application area includes units for which federally enforceable emission limitations have been established by certification.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
<b>D. Alternative Means of Control, Alternative Emission Limitation or Standard, or Equivalent Requirements</b>	
1. The application area is located at a site that is subject to a site-specific requirement of the state implementation plan (SIP).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes units located at the site that are subject to a site-specific requirement of the SIP.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area includes units which demonstrate compliance by using an alternative means of control, alternative emission limitation or standard or equivalent requirements approved by the EPA Administrator. <i>If the response to Question XI.D.3 is "YES," please include a copy of the approval document with the application.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
4. The application area includes units which demonstrate compliance by using an alternative means of control, alternative emission limitation or standard or equivalent requirements approved by the TCEQ Executive Director. <i>If the response to Question XI.D.4 is "YES," please include a copy of the approval document with the application.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

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<b>XI. Miscellaneous (continued)</b>	
<b>E. Title IV - Acid Rain Program</b>	
1. The application area includes emission units subject to the Acid Rain Program (ARP), including the Opt-In Program.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes emission units qualifying for the new unit exemption under 40 CFR § 72.7.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area includes emission units qualifying for the retired unit exemption under 40 CFR § 72.8.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>F. 40 CFR Part 97, Subpart EEEEE - Cross-State Air Pollution Rule (CSAPR) NO<sub>x</sub> Ozone Season Group 2 Trading Program</b>	
1. The application area includes emission units subject to the requirements of the CSAPR NO <sub>x</sub> Ozone Season Group 2 Trading Program. <i>If the response to Question XI.F.1 is "NO," go to Question XI.F.7.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart H for NO <sub>x</sub> and heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes gas or oil-fired units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart H for NO <sub>x</sub> , and the monitoring requirements of 40 CFR Part 75, Appendix D for heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes gas or oil-fired peaking units that are complying with the monitoring requirements of 40 CFR Part 75, Appendix E for NO <sub>x</sub> , and the monitoring requirements of 40 CFR Part 75, Appendix D for heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes gas or oil-fired units that are complying with the Low Mass Emissions monitoring requirements of 40 CFR § 75.19 for NO <sub>x</sub> and heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes units that are complying with EPA-approved alternative monitoring system requirements of 40 CFR Part 75, Subpart E for NO <sub>x</sub> and heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes emission units that qualify for the CSAPR NO <sub>x</sub> Ozone Season Group 2 retired unit exemption.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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<b>XI. Miscellaneous (continued)</b>	
<b>G. 40 CFR Part 97, Subpart FFFFF - Texas SO<sub>2</sub> Trading Program</b>	
1. The application area includes emission units complying with the requirements of the Texas SO <sub>2</sub> Trading Program. <i>If the response to Question XI.G.1 is "NO," go to Question XI.G.6.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart B for SO <sub>2</sub> and 40 CFR Part 75, Subpart H for heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes gas or oil-fired units that are complying with the monitoring requirements of 40 CFR Part 75, Appendix D for SO <sub>2</sub> and heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes gas or oil-fired units that are complying with the Low Mass Emissions monitoring requirements of 40 CFR § 75.19 for SO <sub>2</sub> and heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes units that are complying with EPA-approved alternative monitoring system requirements of 40 CFR Part 75, Subpart E for SO <sub>2</sub> and heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes emission units that qualify for the Texas SO <sub>2</sub> Trading Program retired unit exemption.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>H. Permit Shield (SOP Applicants Only)</b>	
1. A permit shield for negative applicability entries on Form OP-REQ2 (Negative Applicable Requirement Determinations) is being requested or already exists in the permit.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 81</b>	
<b>XI. Miscellaneous (continued)</b>	
<b>I. GOP Type (Complete this section for GOP applications only)</b>	
1. The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under GOP No. 511 - Oil and Gas General Operating Permit for Brazoria, Chambers, Collin, Dallas, Denton, El Paso, Ellis, Fort Bend, Galveston, Hardin, Harris, Jefferson, Johnson, Kaufman, Liberty, Montgomery, Orange, Parker, Rockwall, Tarrant, Waller, and Wise Counties.	<input type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under GOP No. 512 - Oil and Gas General Operating Permit for Gregg, Nueces, and Victoria Counties.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under GOP No. 513 - Oil and Gas General Operating Permit for Aransas, Bexar, Calhoun, Matagorda, San Patricio, and Travis Counties.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under GOP No. 514 - Oil and Gas General Operating Permit for All Texas Counties Except Aransas, Bexar, Brazoria, Calhoun, Chambers, Collin, Dallas, Denton, El Paso, Ellis, Fort Bend, Galveston, Gregg, Hardin, Harris, Jefferson, Johnson, Kaufman, Liberty, Matagorda, Montgomery, Nueces, Orange, Parker, Rockwall, San Patricio, Tarrant, Travis, Victoria, Waller, and Wise County.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area is applying for initial issuance, revision, or renewal of a solid waste landfill general operating permit under GOP No. 517 - Municipal Solid Waste Landfill general operating permit.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>J. Title 30 TAC Chapter 101, Subchapter H</b>	
1. The application area is located in a nonattainment area. <i>If the response to Question XI.J.1 is "NO," go to question XI.J.3.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. The applicant has or will generate emission reductions to be credited in the TCEQ Emissions Banking and Trading Program.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
3. The applicant has or will generate discrete emission reductions to be credited in the TCEQ Emissions Banking and Trading Program.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A



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<b>Form OP-REQ1: Page 82</b>	
<b>XI. Miscellaneous (continued)</b>	
<b>J. Title 30 TAC Chapter 101, Subchapter H (continued)</b>	
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 <sub>x</sub> .	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes an electric generating facility permitted under 30 TAC Chapter 116, Subchapter I.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
6. The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area and the site has a potential to emit more than 10 tpy of highly-reactive volatile organic compounds (HRVOC) from facilities covered under 30 TAC Chapter 115, Subchapter H, Divisions 1 and 2.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area, the site has a potential to emit 10 tpy or less of HRVOC from covered facilities and the applicant is opting to comply with the requirements of 30 TAC Chapter 101, Subchapter H, Division 6, Highly Reactive VOC Emissions Cap and Trade Program.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>K. Periodic Monitoring</b>	
1. The applicant or permit holder is submitting at least one periodic monitoring proposal described on Form OP-MON in this application.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The permit currently contains at least one periodic monitoring requirement. <i>If the responses to Questions XI.K.1 and XI.K.2 are both "NO," go to Section XI.L.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
3. All periodic monitoring requirements are being removed from the permit with this application.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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<b>Form OP-REQ1: Page 83</b>	
<b>XI. Miscellaneous (continued)</b>	
<b>L. Compliance Assurance Monitoring</b>	
1. The application area includes at least one unit that does not meet the CAM exemptions in 40 CFR § 64.2(b) for all applicable requirements that it is subject to, and the unit has a pre-control device potential to emit greater than or equal to the amount in tons per year required in a site classified as a major source. <i>If the response to Question XI.L.1 is "NO," go to Section XI.M.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The unit or units defined by XI.L.1 are using a control device to comply with an applicable requirement. <i>If the response to Question XI.L.2 is "NO," go to Section XI.M.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The permit holder has submitted a CAM proposal on Form OP-MON in a previous application.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The owner/operator or permit holder is submitting a CAM proposal on Form OP-MON according to the deadlines for submittals in 40 CFR § 64.5 in this application. <i>If the responses to Questions XI.L.3 and XI.L.4 are both "NO," go to Section XI.M.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The owner/operator or permit holder is submitting a CAM implementation plan and schedule to be incorporated as enforceable conditions in the permit.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. Provide the unit identification numbers for the units for which the applicant is submitting a CAM implementation plan and schedule in the space below.	
7. At least one unit defined by XI.L.1 and XI.L.2 is using a CEMS, COMS or PEMS meeting the requirements of 40 CFR § 64.3(d)(2).	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. All units defined by XI.L.1 and XI.L.2 are using a CEMS, COMS or PEMS meeting the requirements of 40 CFR § 64.3(d)(2). <i>If the response to Question XI.L.8 is "YES," go to Section XI.M.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 84</b>	
<b>XI. Miscellaneous (continued)</b>	
<b>L. Compliance Assurance Monitoring (continued)</b>	
9. At least one of the CAM proposals as described by question XI.L.3 or XI.L.4 addresses particulate matter, and the emission unit has a capture system as defined in 40 CFR §64.1.	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. At least one of the CAM proposals as described by question XI.L.3 or XI.L.4 addresses VOC, and the emission unit has a capture system as defined in 40 CFR §64.1.	<input type="checkbox"/> YES <input type="checkbox"/> NO
11. At least one of the CAM proposals as described by question XI.L.3 or XI.L.4 addresses a regulated pollutant other than particulate matter or VOC, and the emission unit has a capture system as defined in 40 CFR §64.1.	<input type="checkbox"/> YES <input type="checkbox"/> NO
12. The control device in the CAM proposal as described by question XI.L.3 or XI.L.4 has a bypass.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>M. Title 30 TAC Chapter 113, Subchapter D, Division 5 - Emission Guidelines and Compliance Times</b>	
1. The application area includes at least one air curtain incinerator that commenced construction on or before December 9, 2004. <i>If the response to Question XI.M.1 is "NO," or "N/A," go to Section XII.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. All air curtain incinerators constructed on or before December 9, 2004 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>XII. New Source Review (NSR) Authorizations</b>	
<b>A. Waste Permits with Air Addendum</b>	
1. The application area includes a Municipal Solid Waste Permit or an Industrial Hazardous Waste with an Air Addendum. <i>If the response to XII.A.1 is "YES," include the waste permit numbers and issuance date in Section XII.J.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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<b>Form OP-REQ1: Page 85</b>	
<b>XII. New Source Review (NSR) Authorizations (continued)</b>	
<b>B. Air Quality Standard Permits</b>	
1. The application area includes at least one Air Quality Standard Permit NSR authorization. <i>If the response to XII.B.1 is "NO," go to Section XII.C. If the response to XII.B.1 is "YES," be sure to include the standard permit's registration numbers in Section XII.H and answer XII.B.2 - B.16 as appropriate.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area includes at least one "State Pollution Control Project" Air Quality Standard Permit NSR authorization under 30 TAC § 116.617.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes at least one non-rule Air Quality Standard Permit for Pollution Control Projects NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes at least one "Installation and/or Modification of Oil and Gas Facilities" Air Quality Standard Permit NSR authorization under 30 TAC § 116.620.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
5. The application area includes at least one non-rule Air Quality Standard Permit for Oil and Gas Handling and Production Facilities NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
6. The application area includes at least one "Municipal Solid Waste Landfill" Air Quality Standard Permit NSR authorization under 30 TAC § 116.621.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
7. The application area includes at least one "Municipal Solid Waste Landfill Facilities and Transfer Stations" Standard Permit authorization under 30 TAC Chapter 330, Subchapter U.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
8. The application area includes at least one "Concrete Batch Plant" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
9. The application area includes at least one "Concrete Batch Plant with Enhanced Controls" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
10. The application area includes at least one "Hot Mix Asphalt Plant" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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<b>Form OP-REQ1: Page 86</b>	
<b>XII. New Source Review (NSR) Authorizations (continued)</b>	
<b>B. Air Quality Standard Permits (continued)</b>	
11. The application area includes at least one "Rock Crusher" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
12. The application area includes at least one "Electric Generating Unit" Air Quality Standard Permit NSR authorization. <i>If the response to XII.B.12 is "NO," go to Question XII.B.15.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
13. For purposes of "Electric Generating Unit" Air Quality Standard Permit, the application area is located in the East Texas Region.	<input type="checkbox"/> YES <input type="checkbox"/> NO
14. For purposes of "Electric Generating Unit" Air Quality Standard Permit, the application area is located in the West Texas Region.	<input type="checkbox"/> YES <input type="checkbox"/> NO
15. The application area includes at least one "Boiler" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
16. The application area includes at least one "Sawmill" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>C. Flexible Permits</b>	
1. The application area includes at least one Flexible Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>D. Multiple Plant Permits</b>	
1. The application area includes at least one Multi-Plant Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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<b>Form OP-REQ1: Page 87</b>			
<b>XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)</b>			
<b>E. PSD Permits and PSD Major Pollutants</b>			
PSD Permit No.:	Issuance Date:	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
If PSD Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: <a href="http://www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html">www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html</a> .			
<b>F. Nonattainment (NA) Permits and NA Major Pollutants</b>			
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: <a href="http://www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html">www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html</a> .			
<b>G. NSR Authorizations with FCAA § 112(g) Requirements</b>			
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:
<b>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</b>			
Authorization No.: 8567	Issuance Date: 07/25/2018 Issuance Date: 12/22/2021	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:

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<b>Form OP-REQ1: Page 88</b>	
<b>XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)</b>	
<b>I. Permits by Rule (30 TAC Chapter 106) for the Application Area</b>	
<i>A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.</i>	
PBR No.: 106.124	Version No./Date: 09/04/2000
PBR No.: 106.261	Version No./Date: 11/01/2003
PBR No.: 106.262	Version No./Date: 11/01/2003
PBR No.: <b>106.263</b>	Version No./Date: <b>11/01/2001</b>
PBR No.: <b>106.371</b>	Version No./Date: <b>09/04/2000</b>
PBR No.: 106.454	Version No./Date: 07/08/1998
PBR No.: 106.473	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:
<b>J. Municipal Solid Waste and Industrial Hazardous Waste Permits With an Air Addendum</b>	
Permit No.:	Issuance Date:
Permit No.:	Issuance Date:
Permit No.:	Issuance Date:
Permit No.:	Issuance Date:

**TCEQ - 10043 (APDG 5733v46, Revised 11/20) OP-REQ1**

**This form is for use by facilities subject to air quality permit requirements and may be revised periodically. (Title V IMS Release 11/20)**

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

Date	Permit No.	Regulated Entity No.
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Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
		B77APD132	OP-REQ2	30 TAC Chapter 115, Storage of VOCs	115.111(a)(8)	Capacity < 1,000 gallons
		B77APD132	OP-REQ2	40 CFR Part 60, Subpart Kb	60.110b(a)	Constructed after July 23, 1984 and capacity < 19,800 gallons
		B77APD132	OP-REQ2	40 CFR Part 61, Subpart FF	61.340(a)	Does not contain or store benzene waste
		B77APD132	OP-REQ2	40 CFR Part 61, Subpart Y	61.270(a)	Does not store benzene
	2	<del>B77APFU1</del>	<del>OP-UA12</del>	<del>40 CFR Part 60, Subpart DDD</del>	<del>60.560(b)(1)(ii)</del>	<del>Facility constructed, reconstructed, or modified prior to 9/30/1987</del>
	2	<del>B77APFU1</del>	<del>OP-UA12</del>	<del>40 CFR Part 60, Subpart VV</del>	<del>60.480(b)</del>	<del>Facility not constructed or modified after 1/5/81</del>
		B77APPT10	OP-UA15	40 CFR Part 63, Subpart FFFF	63.2550(i)	Uncontrolled HAP emissions are less than 200 lb/yr
		B77APPT10A	OP-UA15	40 CFR Part 63, Subpart FFFF	63.2550(i)	Uncontrolled HAP emissions are less than 200 lb/yr
		B77APPT11	OP-UA15	40 CFR Part 63, Subpart FFFF	63.2550(i)	Uncontrolled HAP emissions are less than 200 lb/yr
		B77APPT11A	OP-UA15	40 CFR Part 63, Subpart FFFF	63.2550(i)	Uncontrolled HAP emissions are less than 200 lb/yr



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Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
		B77APPT12	OP-UA15	40 CFR Part 63, Subpart FFFF	63.2550(i)	Uncontrolled HAP emissions are less than 200 lb/yr
		B77APPT12A	OP-UA15	40 CFR Part 63, Subpart FFFF	63.2550(i)	Uncontrolled HAP emissions are less than 200 lb/yr
		B77APRX1	OP-REQ2	40 CFR Part 60, Subpart RRR	60.700(a)	Affected facility does not meet the definition of an oxidation reactor and does not produce any of the chemicals listed in 60.707
		B77APSC01	OP-REQ2	30 TAC Chapter 115, Degreasing Processes	115.411(4)	The remote reservoir cold cleaner uses a solvent with a True Vapor Pressure of < 0.6 psia at 100F with a drain area < 16 in2. Waste solvent is disposed of in enclosed containers.
		B77APSPS1	OP-UA14	40 CFR Part 61, Subpart FF	61.340(a)	Does not contain or store benzene waste
		B77APSPS2	OP-UA14	40 CFR Part 61, Subpart FF	61.340(a)	Does not contain or store benzene waste
		B77APSPS3	OP-UA14	40 CFR Part 61, Subpart FF	61.340(a)	Does not contain or store benzene waste
		B77APST1	OP-UA3	40 CFR Part 60, Subpart Ka	60.110a(a)	Constructed after May 18, 1978 and prior to July 23, 1984 and storage capacity < 40,000 gallons

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Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
		B77APST1	OP-UA3	40 CFR Part 61, Subpart FF	61.340(a)	Does not contain or store benzene waste
		B77APST1	OP-UA3	40 CFR Part 61, Subpart Y	61.270(a)	Does not store benzene
		B77APST10	OP-UA3	40 CFR Part 60, Subpart Ka	60.110a(a)	Constructed after May 18, 1978 and prior to July 23, 1984 and does not store petroleum liquids
		B77APST10	OP-UA3	40 CFR Part 61, Subpart FF	61.340(a)	Does not contain or store benzene waste
		B77APST10	OP-UA3	40 CFR Part 61, Subpart Y	61.270(a)	Does not store benzene
		B77APST10	OP-UA3	40 CFR Part 63, Subpart FFFF	63.2550(i)	Contains HAP only as impurities
		B77APST11	OP-UA3	40 CFR Part 60, Subpart Ka	60.110a(a)	Constructed after May 18, 1978 and prior to July 23, 1984 and does not store petroleum liquids
		B77APST11	OP-UA3	40 CFR Part 61, Subpart FF	61.340(a)	Does not contain or store benzene waste
		B77APST11	OP-UA3	40 CFR Part 61, Subpart Y	61.270(a)	Does not store benzene
		B77APST11	OP-UA3	40 CFR Part 63, Subpart FFFF	63.2550(i)	Contains HAP only as impurities

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Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
		B77APST12	OP-UA3	40 CFR Part 60, Subpart Ka	60.110a(a)	Constructed after May 18, 1978 and prior to July 23, 1984 and does not store petroleum liquids
		B77APST12	OP-UA3	40 CFR Part 61, Subpart FF	61.340(a)	Does not contain or store benzene waste
		B77APST12	OP-UA3	40 CFR Part 61, Subpart Y	61.270(a)	Does not store benzene
		B77APST12	OP-UA3	40 CFR Part 63, Subpart FFFF	63.2550(i)	Contains HAP only as impurities
		B77APST133	OP-UA15	40 CFR Part 63, Subpart FFFF	63.2550(i)	By definition, this vent is not a regulated batch process vent because it contains less than 50 ppm of HAP
		B77APST750	OP-REQ2	30 TAC Chapter 115, Storage of VOCs	115.111(a)(8)	Capacity is less than 1,000 gallons
		B77APST750	OP-REQ2	40 CFR Part 60, Subpart Kb	60.110b(a)	Constructed after July 23, 1984 and capacity is less than 1,000 gallons
		B77APST750	OP-REQ2	40 CFR Part 63, Subpart FFFF	63.2550(i)	Contains HAP only as impurities
		B77APST8	OP-UA3	40 CFR Part 60, Subpart Ka	60.110a(a)	Constructed after May 18, 1978 and prior to July 23, 1984 and does not store petroleum liquids

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

Date	Permit No.	Regulated Entity No.
February 14, 2024	O2215	RN110300126

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
		B77APST8	OP-UA3	40 CFR Part 61, Subpart FF	61.340(a)	Does not contain or store benzene waste
		B77APST8	OP-UA3	40 CFR Part 61, Subpart Y	61.270(a)	Does not store benzene
		B77APSTT14	OP-UA3	40 CFR Part 60, Subpart Ka	60.110a(a)	Constructed after May 18, 1978 and prior to July 23, 1984 and does not store petroleum liquids
		B77APSTT14	OP-UA3	40 CFR Part 61, Subpart FF	61.340(a)	Does not contain or store benzene waste
		B77APSTT14	OP-UA3	40 CFR Part 61, Subpart Y	61.270(a)	Does not store benzene
		B77APSTT15	OP-UA3	40 CFR Part 60, Subpart Ka	60.110a(a)	Constructed after May 18, 1978 and prior to July 23, 1984 and does not store petroleum liquids
		B77APSTT15	OP-UA3	40 CFR Part 61, Subpart FF	61.340(a)	Does not contain or store benzene waste
		B77APSTT15	OP-UA3	40 CFR Part 61, Subpart Y	61.270(a)	Does not store benzene
		B77APV101	OP-UA15	40 CFR Part 63, Subpart FFFF	63.2550(i)	Contains less than 50 ppmv of HAP
		B77APV102	OP-UA15	40 CFR Part 63, Subpart FFFF	63.2550(i)	Contains less than 50 ppmv of HAP

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

Date	Permit No.	Regulated Entity No.
February 14, 2024	O2215	RN110300126

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
		B77APWW	OP-REQ2	30 TAC Chapter 115, Industrial Wastewater	115.140	No affected VOC wastewater streams
		B77SB101	OP-UA15	40 CFR Part 63, Subpart FFFF	63.2550(i)	Uncontrolled HAP emissions are less than 200 lb/yr
		B77SB102	OP-UA15	40 CFR Part 63, Subpart FFFF	63.2550(i)	Uncontrolled HAP emissions are less than 200 lb/yr
		B77SB103	OP-UA15	40 CFR Part 63, Subpart FFFF	63.2550(i)	Uncontrolled HAP emissions are less than 200 lb/yr
		B77SB104	OP-UA15	40 CFR Part 63, Subpart FFFF	63.2550(i)	Uncontrolled HAP emissions are less than 200 lb/yr
		B77SB105	OP-UA15	40 CFR Part 63, Subpart FFFF	63.2550(i)	Uncontrolled HAP emissions are less than 200 lb/yr
		B77SB106	OP-UA15	40 CFR Part 63, Subpart FFFF	63.2550(i)	Uncontrolled HAP emissions are less than 200 lb/yr
		B77SB107	OP-UA15	40 CFR Part 63, Subpart FFFF	63.2550(i)	Uncontrolled HAP emissions are less than 200 lb/yr
		B77SPS102	OP-UA14	40 CFR Part 61, Subpart FF	61.340(a)	Does not contain or store benzene waste

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

Date	Permit No.	Regulated Entity No.
February 14, 2024	O2215	RN110300126

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
	2	<del>B78APFU1</del>	<del>OP-UA12</del>	<del>40 CFR Part 60, Subpart DDD</del>	60.560(b)(1)(ii)	<del>Facility constructed, reconstructed, or modified prior to 9/30/1987</del>
	2	<del>B78APFU1</del>	<del>OP-UA12</del>	<del>40 CFR Part 60, Subpart VV</del>	60.480(b)	<del>Facility not constructed or modified after 1/5/81</del>
		B78APPTT1	OP-REQ2	40 CFR Part 60, Subpart Kb	60.110b(a)	Constructed after July 23, 1984 and capacity is less than 19,800 gallons
		B78APPTT1	OP-REQ2	40 CFR Part 61, Subpart FF	61.340(a)	Does not contain or store benzene waste
		B78APPTT1	OP-REQ2	40 CFR Part 61, Subpart Y	61.270(a)	Does not store benzene
		B78APST5	OP-UA3	40 CFR Part 60, Subpart Ka	60.110a(a)	Constructed after May 18, 1978 and prior to July 23, 1984 and does not store petroleum liquids
		B78APST5	OP-UA3	40 CFR Part 61, Subpart FF	61.340(a)	Does not contain or store benzene waste
		B78APST5	OP-UA3	40 CFR Part 61, Subpart Y	61.270(a)	Does not store benzene

TCEQ-10017 (APD-ID156v2.0, Revised 07/22) Form OP-REQ2 - Negative Applicable/Superseded Requirement Determinations  
This form for use by facilities subject to air quality permit requirements and  
may be revised periodically (Title V Release 10/07)

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

**Table 1a: Additions**

<b>Date:</b> February 14, 2024	<b>Regulated Entity No.:</b> RN110300126	<b>Permit No.:</b> O2215
<b>Company Name:</b> SK Primacor Americas LLC	<b>Area Name:</b> Adhesive Polymers 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)
	B77APCF401	OP-UA15	R5121-01	VOC	30 TAC Chapter 115, Vent Gas Controls	[G]115.122(a)(4), 115.127(a)(1)
	B77APCF402	OP-UA15	R5121-01	VOC	30 TAC Chapter 115, Vent Gas Controls	[G]115.122(a)(4), 115.127(a)(1)
	B77APCT1	OP-UA13	R5760-01	HRVOC	30 TAC Chapter 115, HRVOC Cooling Towers	115.764(a)(1), 115.766(i), 115.767(6)
	B77APD108	OP-UA15	R5121-01	VOC	30 TAC Chapter 115, Vent Gas Controls	[G]115.122(a)(4), 115.127(a)(1)
	B77APD109	OP-UA15	R5121-01	VOC	30 TAC Chapter 115, Vent Gas Controls	[G]115.122(a)(4), 115.127(a)(1)
	B77APFU1	OP-UA1	63FFFF-01	HAPS	40 CFR Part 63, Subpart FFFF	63.2480(a)
	B77APFU1	OP-UA12	R5352-ALL	VOC	30 TAC Chapter 115, Pet. Refinery & Petrochemicals	ALL
	B77APFU1	OP-UA12	R5780-ALL	HRVOC	30 TAC Chapter 115, HRVOC Fugitive Emissions	ALL

**Applicable Requirements Summary  
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**Table 1a: Additions**

<b>Date:</b> February 14, 2024	<b>Regulated Entity No.:</b> RN110300126	<b>Permit No.:</b> O2215
<b>Company Name:</b> SK Primacor Americas LLC	<b>Area Name:</b> Adhesive Polymers 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)
	B77APLR1	OP-UA4	R5211-01	VOC	30 TAC Chapter 115, Loading and Unloading of VOC	115.212(a)(3)(B), (a)(3)(E), 115.213(b), (b)(1), (b)(4), [G](b)(6), 115.214(a)(1)(B), (a)(1)(D), (a)(1)(D)(ii)
	B77APLR133	OP-UA4	R5211-01	VOC	30 TAC Chapter 115, Loading and Unloading of VOC	115.212(a)(2), 115.214(a)(1)(B), (a)(1)(D), 115.214(a)(1)(D)(i), 115.217(a)(1)
	B77APLR750	OP-UA4	R5211-01	VOC	30 TAC Chapter 115, Loading and Unloading of VOC	115.214(a)(1)(B), (a)(1)(D), (a)(1)(D)(i), 115.217(a)(1)
	B77APPT10	OP-UA15	R5121-01	VOC	30 TAC Chapter 115, Vent Gas Controls	[G]115.122(a)(4), 115.127(a)(2), (a)(2)(A)
	B77APPT10A	OP-UA15	R5121-01	VOC	30 TAC Chapter 115, Vent Gas Controls	[G]115.122(a)(4), 115.127(a)(2), (a)(2)(A)
	B77APPT11	OP-UA15	R5121-01	VOC	30 TAC Chapter 115, Vent Gas Controls	[G]115.122(a)(4), 115.127(a)(2), (a)(2)(A)
	B77APPT11A	OP-UA15	R5121-01	VOC	30 TAC Chapter 115, Vent Gas Controls	[G]115.122(a)(4), 115.127(a)(2), (a)(2)(A)



**Applicable Requirements Summary  
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**Table 1a: Additions**

<b>Date:</b> February 14, 2024	<b>Regulated Entity No.:</b> RN110300126	<b>Permit No.:</b> O2215
<b>Company Name:</b> SK Primacor Americas LLC	<b>Area Name:</b> Adhesive Polymers 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)
	B77APPT12	OP-UA15	R5121-01	VOC	30 TAC Chapter 115, Vent Gas Controls	[G]115.122(a)(4), 115.127(a)(2), (a)(2)(A)
	B77APPT12A	OP-UA15	R5121-01	VOC	30 TAC Chapter 115, Vent Gas Controls	[G]115.122(a)(4), 115.127(a)(2), (a)(2)(A)
	B77APPVAV	OP-UA15	R5720-01	HRVOC	30 TAC Chapter 115, HRVOC Vent Gas	115.727(c)(2)
	B77APSC07	OP-UA16	R5412-01	VOC	30 TAC Chapter 115, Degreasing Processes	115.411(1)-(2), 115.412(1), [G]115.412(1)(A), 115.412(1)(C)-(D), [G]115.412(1)(F)
	B77APSCO7	OP-UA57	R5460-01	VOC	30 TAC Chapter 115, Industrial Cleaning Solvents	[G]115.461(d), [G]115.463(c)
	B77APSP101	OP-UA15	R5121-01	VOC	30 TAC Chapter 115, Vent Gas Controls	[G]115.122(a)(4), 115.127(a)(1),
	B77APSP101	OP-UA15	R5720-01	HRVOC	30 TAC Chapter 115, HRVOC Vent Gas	115.727(c)(2)
	B77APSPS1	OP-UA14	R5131-01	VOC	30 TAC Chapter 115, Water Separation	[G]115.132(a)(4), 115.137(a)(2)
	B77APSPS2	OP-UA14	R5131-01	VOC	30 TAC Chapter 115, Water Separation	[G]115.132(a)(4), 115.137(a)(2)

**Applicable Requirements Summary  
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**Table 1a: Additions**

<b>Date:</b> February 14, 2024	<b>Regulated Entity No.:</b> RN110300126	<b>Permit No.:</b> O2215
<b>Company Name:</b> SK Primacor Americas LLC	<b>Area Name:</b> Adhesive Polymers 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)
	B77APSPS3	OP-UA14	R5131-01	VOC	30 TAC Chapter 115, Water Separation	[G]115.132(a)(4), 115.137(a)(2)
	B77APST1	OP-UA3	R5112-01	VOC	30 TAC Chapter 115, Storage of VOCs	115.111(a)(1)
	B77APST10	OP-UA3	R5112-01	VOC	30 TAC Chapter 115, Storage of VOCs	115.111(a)(1)
	B77APST11	OP-UA3	R5112-01	VOC	30 TAC Chapter 115, Storage of VOCs	115.111(a)(1)
	B77APST12	OP-UA3	R5112-01	VOC	30 TAC Chapter 115, Storage of VOCs	115.111(a)(1)
	B77APST133	OP-UA15	R5112-01	VOC	30 TAC Chapter 115, Vent Gas Controls	[G]115.122(a)(4), 115.127(a)(2), (a)(2)(A)
	B77APST8	OP-UA3	R5112-01	VOC	30 TAC Chapter 115, Storage of VOCs	115.111(a)(1)
	B77APSTT14	OP-UA3	R5112-01	VOC	30 TAC Chapter 115, Storage of VOCs	115.111(a)(1)
	B77APSTT15	OP-UA3	R5112-01	VOC	30 TAC Chapter 115, Storage of VOCs	115.111(a)(1)

**Applicable Requirements Summary  
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**Table 1a: Additions**

<b>Date:</b> February 14, 2024	<b>Regulated Entity No.:</b> RN110300126	<b>Permit No.:</b> O2215
<b>Company Name:</b> SK Primacor Americas LLC	<b>Area Name:</b> Adhesive Polymers 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)
	B77APV101	OP-UA15	R5121-01	VOC	30 TAC Chapter 115, Vent Gas Controls	[G]115.122(a)(4), 115.127(a)(1)
	B77APV101	OP-UA15	R5720-01	HRVOC	30 TAC Chapter 115, HRVOC Vent Gas	115.727(c)(2)
	B77APV102	OP-UA15	R5121-01	VOC	30 TAC Chapter 115, Vent Gas Controls	[G]115.122(a)(4), 115.127(a)(1)
	B77APV102	OP-UA15	R5720-01	HRVOC	30 TAC Chapter 115, HRVOC Vent Gas	115.727(c)(2)
	B77SB101	OP-UA15	R5121-01	VOC	30 TAC Chapter 115, Vent Gas Controls	[G]115.122(a)(4), 115.127(a)(1)
	B77SB101	OP-UA15	R5720-01	HRVOC	30 TAC Chapter 115, HRVOC Vent Gas	115.727(c)(2)
	B77SB102	OP-UA15	R5121-01	VOC	30 TAC Chapter 115, Vent Gas Controls	[G]115.122(a)(4), 115.127(a)(1)
	B77SB102	OP-UA15	R5720-01	HRVOC	30 TAC Chapter 115, HRVOC Vent Gas	115.727(c)(2)
	B77SB103	OP-UA15	R5121-01	VOC	30 TAC Chapter 115, Vent Gas Controls	[G]115.122(a)(4), 115.127(a)(1)

**Applicable Requirements Summary**  
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**Federal Operating Permit Program**

**Table 1a: Additions**

<b>Date:</b> February 14, 2024	<b>Regulated Entity No.:</b> RN110300126	<b>Permit No.:</b> O2215
<b>Company Name:</b> SK Primacor Americas LLC	<b>Area Name:</b> Adhesive Polymers 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)
	B77SB103	OP-UA15	R5720-01	HRVOC	30 TAC Chapter 115, HRVOC Vent Gas	115.727(c)(2)
	B77SB104	OP-UA15	R5121-01	VOC	30 TAC Chapter 115, Vent Gas Controls	[G]115.122(a)(4), 115.127(a)(1)
	B77SB104	OP-UA15	R5720-01	HRVOC	30 TAC Chapter 115, HRVOC Vent Gas	115.727(c)(2)
	B77SB105	OP-UA15	R5121-01	VOC	30 TAC Chapter 115, Vent Gas Controls	[G]115.122(a)(4), 115.127(a)(1)
	B77SB105	OP-UA15	R5720-01	HRVOC	30 TAC Chapter 115, HRVOC Vent Gas	115.727(c)(2)
	B77SB106	OP-UA15	R5121-01	VOC	30 TAC Chapter 115, Vent Gas Controls	[G]115.122(a)(4), 115.127(a)(1)
	B77SB106	OP-UA15	R5720-01	HRVOC	30 TAC Chapter 115, HRVOC Vent Gas	115.727(c)(2)
	B77SB107	OP-UA15	R5121-01	VOC	30 TAC Chapter 115, Vent Gas Controls	[G]115.122(a)(4), 115.127(a)(1)
	B77SB107	OP-UA15	R5720-01	HRVOC	30 TAC Chapter 115, HRVOC Vent Gas	115.727(c)(2)
	B77SPS102	OP-UA14	R5131-01	VOC	30 TAC Chapter 115, Water Separation	[G]115.132(a)(4), 115.137(a)(2)

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

**Table 1a: Additions**

<b>Date:</b> February 14, 2024	<b>Regulated Entity No.:</b> RN110300126	<b>Permit No.:</b> O2215
<b>Company Name:</b> SK Primacor Americas LLC	<b>Area Name:</b> Adhesive Polymers 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)
	B77SPS103	OP-UA15	R5121-01	VOC	30 TAC Chapter 115, Vent Gas Controls	115.121(a)(1), 115.122(a)(1), (a)(1)(B), 60.18
	B78APF1	OP-UA7	R1111-01	OPACITY	30 TAC Chapter 111, Visible Emissions	111.111(a)(4)(A)
	B78APF1	OP-UA7	60A-01	OPACITY	40 CFR Part 60, Subpart A	60.18(b), 60.18(c)(1)-(2), (c)(3)(ii), (c)(4)(iii), 60.18(c)(6), (e)
	B78APF1	OP-UA7	63A-01	HAPS	40 CFR Part 63, Subpart A	63.11(b)(1)-(3), 63.11(b)(4), (b)(5), (b)(6)(ii), 63.11(b)(7)(iii)
	B78APF1	OP-UA15	R5720-01	HRVOC	30 TAC Chapter 115, HRVOC Vent Gas	115.722(d), 115.722(d)(1)-(2), [G]115.725(d)(1), (d)(2), (d)(2)(A)(i), [G]115.725(d)(2)(A)(ii), (d)(2)(A)(iii)-(iv), 115.725(d)(2)(B), (d)(2)(B)(i)-(iv), [G](l), 115.725(m)(2)(A)-(B)
	B78APF1	OP-UA15	63FFFF-01	HAPS	40 CFR Part 63, Subpart FFFF	63.11(b) , 63.2450(b), 63.2455(a)-Table 1.1.a.ii , (a)-(b), (b)(1), 63.982(b), 63.983(a)(1)-(2), (d)(1), (d)(1)(i), 63.983[G](d)(2), (d)(3), 63.987(a), 63.997(b)(2)-(3), (c)(3)

**Applicable Requirements Summary**  
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**Federal Operating Permit Program**

**Table 1a: Additions**

<b>Date:</b> February 14, 2024	<b>Regulated Entity No.:</b> RN110300126	<b>Permit No.:</b> O2215
<b>Company Name:</b> SK Primacor Americas LLC	<b>Area Name:</b> Adhesive Polymers 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)
	B78APFU1	OP-UA1	63FFFF-01	HAPS	40 CFR Part 63, Subpart FFFF	63.2480(a)
	B78APFU1	OP-UA12	R5352-ALL	VOC	30 TAC Chapter 115, Pet. Refinery & Petrochemicals	ALL
	B78APFU1	OP-UA12	R5780-ALL	HRVOC	30 TAC Chapter 115, HRVOC Fugitive Emissions	ALL
	B78APKO2A	OP-UA15	R5121-01	VOC	30 TAC Chapter 115, Vent Gas Controls	115.121(a)(1), 115.122(a)(1), (a)(1)(B), 60.18
	B78APKO2A	OP-UA15	R5720-01	HRVOC	30 TAC Chapter 115, HRVOC Vent Gas	115.722(d), (d)(1)-(2), 115.727(f)
	B78APPTT1	OP-UA3	R5112-01	VOC	30 TAC Chapter 115, Storage of VOCs	115.112(e)(1), 115.112(e)(3), 115.112(e)(3)(C), 60.18

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**Table 1a: Additions**

<b>Date:</b> February 14, 2024	<b>Regulated Entity No.:</b> RN110300126	<b>Permit No.:</b> O2215
<b>Company Name:</b> SK Primacor Americas LLC	<b>Area Name:</b> Adhesive Polymers Plant	

<b>Revision No.</b>	<b>Unit/Group/Process ID No.</b>	<b>Unit/Group/Process Applicable Form</b>	<b>SOP/GOP Index No</b>	<b>Pollutant</b>	<b>Applicable Regulatory Requirement Name</b>	<b>Applicable Regulatory Requirement Standard(s)</b>
	B78APST5	OP-UA3	R5112-01	VOC	30 TAC Chapter 115, Storage of VOCs	115.111(a)(1)
	PROAPP	OP-UA57	R5460-01	VOC	30 TAC Chapter 115, Industrial Cleaning Solvents	[G]115.461(d), [G]115.463(c)
	PROAPP	OP-UA60	63FFFF-01	HAPS	40 CFR Part 63, Subpart FFFF	63.2440(a), 63.2450(a), (l)

**Applicable Requirements Summary  
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**Table 1b: Additions**

<b>Date:</b> February 14, 2024	<b>Regulated Entity No.:</b> RN110300126	<b>Permit No.:</b> O2215
<b>Company Name:</b> SK Primacor Americas LLC	<b>Area Name:</b> Adhesive Polymers Plant	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
	B77APCF401	R5121-01	VOC	[G]115.125, 115.126(2), (3)(A)	115.126, (2)-(3), (3)(A)	NONE
	B77APCF402	R5121-01	VOC	[G]115.125, 115.126(2), (3)(A)	115.126, (2)-(3), (3)(A)	NONE
	B77APCT1	R5760-01	HRVOC	115.764(a)(1), (a)(3), [G](a)(6), (c)	115.766(a)(1)-(3), (a)(5)-(6), (c), 115.766(i)(1)	115.766(i)(2)
	B77APD108	R5121-01	VOC	[G]115.125, 115.126(2), (3)(A)	115.126, (2)-(3), (3)(A)	NONE
	B77APD109	R5121-01	VOC	[G]115.125, 115.126(2), (3)(A)	115.126, (2)-(3), (3)(A)	NONE
	B77APFU1	63FFFF-01	HAPS	General High Level Applicability	General High Level Applicability	General High Level Applicability
	B77APFU1	R5352-ALL	VOC	ALL	ALL	ALL
	B77APFU1	R5780-ALL	HRVOC	ALL	ALL	ALL



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**Table 1b: Additions**

<b>Date:</b> February 14, 2024	<b>Regulated Entity No.:</b> RN110300126	<b>Permit No.:</b> O2215
<b>Company Name:</b> SK Primacor Americas LLC	<b>Area Name:</b> Adhesive Polymers Plant	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
	B77APLR1	R5211-01	VOC	115.212(a)(3)(B), 115.213(b), (b)(1), 115.214(a)(1)(A), (a)(1)(A)(i), 115.215, 115.215(1), [G](2), (4), (9)- (10)	115.213(b)(1), 115.216, (2), (3)(A), 115.216(3)(A)(i)-(iii), (3)(B)	115.213(b)(1)-(4)
	B77APLR133	R5211-01	VOC	115.214(a)(1)(A), (a)(1)(A)(i), 115.215, 115.215(4)	115.216, (2), (3)(B)	NONE
	B77APLR750	R5211-01	VOC	115.214(a)(1)(A), (a)(1)(A)(i), 115.215, 115.215(4)	115.216, (2), (3)(B)	NONE
	B77APPT10	R5121-01	VOC	[G]115.125, 115.126(2)	115.126, (2), (4)	NONE
	B77APPT10A	R5121-01	VOC	[G]115.125, 115.126(2)	115.126, (2), (4)	NONE

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program**

**Table 1b: Additions**

<b>Date:</b> February 14, 2024	<b>Regulated Entity No.:</b> RN110300126	<b>Permit No.:</b> O2215
<b>Company Name:</b> SK Primacor Americas LLC	<b>Area Name:</b> Adhesive Polymers Plant	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
	B77APPT11	R5121-01	VOC	[G]115.125, 115.126(2)	115.126, (2), (4)	NONE
	B77APPT11A	R5121-01	VOC	[G]115.125, 115.126(2)	115.126, (2), (4)	NONE
	B77APPT12	R5121-01	VOC	[G]115.125, 115.126(2)	115.126, (2), (4)	NONE
	B77APPT12A	R5121-01	VOC	[G]115.125, 115.126(2)	115.126, (2), (4)	NONE
	B77APPVAV	R5720-01	HRVOC	NONE	115.726(e)(3)(A), (j)(2)	NONE
	B77APSC07	R5412-01	VOC	[G]115.415(1), (3)	NONE	NONE
	B77APSCO7	R5460-01	VOC	NONE	115.468(b)(2), (b)(5)	NONE
	B77APSP101	R5121-01	VOC	[G]115.125, 115.126(2), (3)(A)	115.126, (2)-(3), (3)(A)	NONE
	B77APSP101	R5720-01	HRVOC	NONE	115.726(e)(3)(A), (j)(2)	NONE

**Applicable Requirements Summary**  
**Form OP-REQ3 (Page 2)**  
**Federal Operating Permit Program**

**Table 1b: Additions**

<b>Date:</b> February 14, 2024	<b>Regulated Entity No.:</b> RN110300126	<b>Permit No.:</b> O2215
<b>Company Name:</b> SK Primacor Americas LLC	<b>Area Name:</b> Adhesive Polymers Plant	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
	B77APSPS1	R5131-01	VOC	[G]115.135(a), 115.136(a)(1), 115.136(a)(3)-(4)	115.136(a)(1), (a)(3)-(4)	NONE
	B77APSPS2	R5131-01	VOC	[G]115.135(a), 115.136(a)(1), 115.136(a)(3)-(4)	115.136(a)(1), (a)(3)-(4)	NONE
	B77APSPS3	R5131-01	VOC	[G]115.135(a), 115.136(a)(1), 115.136(a)(3)-(4)	115.136(a)(1), (a)(3)-(4)	NONE
	B77APST1	R5112-01	VOC	[G]115.117	115.118(a)(1), (a)(5), (a)(7)	NONE
	B77APST10	R5112-01	VOC	[G]115.117	115.118(a)(1), (a)(5), (a)(6)(A), 115.118(a)(7)	NONE
	B77APST11	R5112-01	VOC	[G]115.117	115.118(a)(1), (a)(5), (a)(6)(A), 115.118(a)(7)	NONE
	B77APST12	R5112-01	VOC	[G]115.117	115.118(a)(1), (a)(5), (a)(7)	NONE
	B77APST133	R5121-01	VOC	[G]115.125, 115.126(2)	115.126, (2), (4)	NONE

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program**

**Table 1b: Additions**

<b>Date:</b> February 14, 2024	<b>Regulated Entity No.:</b> RN110300126	<b>Permit No.:</b> O2215
<b>Company Name:</b> SK Primacor Americas LLC	<b>Area Name:</b> Adhesive Polymers Plant	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
	B77APST8	R5112-01	VOC	[G]115.117	115.118(a)(1), (a)(5), (a)(6)(A), 115.118(a)(7)	NONE
	B77APSTT14	R5112-01	VOC	[G]115.117	115.118(a)(1), (a)(5), (a)(7)	NONE
	B77APSTT15	R5112-01	VOC	[G]115.117	115.118(a)(1), (a)(5), (a)(7)	NONE
	B77APV101	R5121-01	VOC	[G]115.125, 115.126(2), (3)(A)	115.126, (2)-(3), (3)(A)	NONE
	B77APV101	R5720-01	HRVOC	NONE	115.726(e)(3)(A), (j)(2)	NONE
	B77APV102	R5121-01	VOC	[G]115.125, 115.126(2), (3)(A)	115.126, (2)-(3), (3)(A)	NONE
	B77APV102	R5720-01	HRVOC	NONE	115.726(e)(3)(A), (j)(2)	NONE
	B77SB101	R5121-01	VOC	[G]115.125, 115.126(2), (3)(A)	115.126, (2)-(3), (3)(A)	NONE
	B77SB101	R5720-01	HRVOC	NONE	115.726(e)(3)(A), (j)(2)	NONE

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program**

**Table 1b: Additions**

<b>Date:</b> February 14, 2024	<b>Regulated Entity No.:</b> RN110300126	<b>Permit No.:</b> O2215
<b>Company Name:</b> SK Primacor Americas LLC	<b>Area Name:</b> Adhesive Polymers Plant	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
	B77SB102	R5121-01	VOC	[G]115.125, 115.126(2), (3)(A)	115.126, (2)-(3), (3)(A)	NONE
	B77SB102	R5720-01	HRVOC	NONE	115.726(e)(3)(A), (j)(2)	NONE
	B77SB103	R5121-01	VOC	[G]115.125, 115.126(2), (3)(A)	115.126, (2)-(3), (3)(A)	NONE
	B77SB103	R5720-01	HRVOC	NONE	115.726(e)(3)(A), (j)(2)	NONE
	B77SB104	R5121-01	VOC	[G]115.125, 115.126(2), (3)(A)	115.126, (2)-(3), (3)(A)	NONE
	B77SB104	R5720-01	HRVOC	NONE	115.726(e)(3)(A), (j)(2)	NONE
	B77SB105	R5121-01	VOC	[G]115.125, 115.126(2), (3)(A)	115.126, (2)-(3), (3)(A)	NONE
	B77SB105	R5720-01	HRVOC	NONE	115.726(e)(3)(A), (j)(2)	NONE
	B77SB106	R5121-01	VOC	[G]115.125, 115.126(2), (3)(A)	115.126, (2)-(3), (3)(A)	NONE

**Applicable Requirements Summary**  
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**Federal Operating Permit Program**

**Table 1b: Additions**

<b>Date:</b> February 14, 2024	<b>Regulated Entity No.:</b> RN110300126	<b>Permit No.:</b> O2215
<b>Company Name:</b> SK Primacor Americas LLC	<b>Area Name:</b> Adhesive Polymers Plant	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
	B77SB106	R5720-01	HRVOC	NONE	115.726(e)(3)(A), (j)(2)	NONE
	B77SB107	R5121-01	VOC	[G]115.125, 115.126(2), (3)(A)	115.126, (2)-(3), (3)(A)	NONE
	B77SB107	R5720-01	HRVOC	NONE	115.726(e)(3)(A), (j)(2)	NONE
	B77SPS102	R5131-01	VOC	[G]115.135(a), 115.136(a)(1), 115.136(a)(3)-(4)	115.136(a)(1), (a)(3)-(4)	NONE
	B77SPS103	R5121-01	VOC	[G]115.125, 115.126(1), (1)(B), (2)	115.126, (1), (1)(B)(2)	NONE
	B78APF1	R1111-01	OPACITY	111.111(a)(4)(A)(i)-(ii)	111.111(a)(4)(A)(ii)	NONE
	B78APF1	60A-01	OPACITY	60.18(d), (f)(1)-(5)	NONE	NONE
	B78APF1	63A-01	HAPS	63.11(b)(4)-(5), (b)(7)(i)	NONE	NONE

**Applicable Requirements Summary**  
**Form OP-REQ3 (Page 2)**  
**Federal Operating Permit Program**

**Table 1b: Additions**

<b>Date:</b> February 14, 2024	<b>Regulated Entity No.:</b> RN110300126	<b>Permit No.:</b> O2215
<b>Company Name:</b> SK Primacor Americas LLC	<b>Area Name:</b> Adhesive Polymers Plant	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
	B78APF1	R5720-01	HRVOC	[G]115.725(d)(1), (d)(2), (d)(2)(A)(i), [G]115.725(d)(2)(A)(ii), 115.725(d)(2)(A)(i)-(iv), (d)(2)(B), 115.725(d)(2)(B)(i)-(iv), (d)(3)-(7), [G]115.725(l), (m)(1), (m)(2)(A)-(B), 115.725(n)	115.726(a)(1), (a)(1)(A), (d)(1)-(4), 115.726(i), (j)(1)-(2)	115.725(n), 115.726(a)(1)(B)
	B78APF1	63FFFF-01	HAPS	[G]63.115(d)(2)(v), (d)(3)(iii), 63.983(b), [G](b)(1)-(3), [G](c)(1), 63.983(c)(2)-(3), (d)(1), (d)(1)(ii), 63.987(c), 63.997(b), (c)(2)-(3), 63.997(c)(3)(i)-(ii)	63.983(b), [G](d)(2), 63.987(c), 63.998(a)(1)(ii), (a)(1)(iii)(A)-(B), [G]63.998(b)(1)-(3), [G](b)(5), [G]63.998(d)(1), (d)(3)(i)-(ii), (d)(5) 63.2450(f)(2), (f)(2)(i)-(ii)	63.997(b)(2), (c)(3), 63.998(a)(1)(iii)(A), [G](b)(3), [G]63.999(a)(1), (b)(5), (c)(1), 63.999(c)(2)(i), (c)(3), (c)(6), [G]63.999(c)(6)(i), (c)(6)(iv), [G]63.999(d)(1)-(2), 63.2450(f)(2)(ii), (q)

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program**

**Table 1b: Additions**

<b>Date:</b> February 14, 2024	<b>Regulated Entity No.:</b> RN110300126	<b>Permit No.:</b> O2215
<b>Company Name:</b> SK Primacor Americas LLC	<b>Area Name:</b> Adhesive Polymers Plant	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
	B78APFU1	63FFFF-01	HAPS	General High Level Applicability	General High Level Applicability	General High Level Applicability
	B78APFU1	R5352-ALL	VOC	ALL	ALL	ALL
	B78APFU1	R5780-ALL	HRVOC	ALL	ALL	ALL
	B78APKO2A	R5121-01	VOC	[G]115.125, 115.126(1), (1)(B), (2)	115.126, (1), (1)(B)(2)	NONE
	B78APKO2A	R5720-01	HRVOC	115.725(n)	115.726(d)(1)-(4), (i), (j)(1)-(2)	115.725(n)
	B78APPTT1	R5112-01	VOC	115.115(a), (a)(6), 115.116(a)(2), [G]115.117	115.118(a)(4), (a)(4)(F), 115.118(a)(5), (a)(7)	NONE
	B78APST5	R5112-01	VOC	[G]115.117	115.118(a)(1), (a)(5), (a)(6)(A), 115.118(a)(7)	NONE



**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
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**Table 1b: Additions**

<b>Date:</b> February 14, 2024	<b>Regulated Entity No.:</b> RN110300126	<b>Permit No.:</b> O2215
<b>Company Name:</b> SK Primacor Americas LLC	<b>Area Name:</b> Adhesive Polymers Plant	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
	PROAPP	R5460-01	VOC	NONE	115.468(b)(2), (b)(5)	NONE
	PROAPP	63FFFF-01	HAPS	63.2445(d)	63.2525, (a), [G](b), (c), (f), (j)	63.2435(d), 63.2445(c), 63.2450(g)(5), (m), (m)(1)-(2), 63.2515(a), (b)(1), (c), 63.2520(a) [G]63.2520(b)-(d), (e), (e)(1), [G]63.2520(e)(10), (e)(2)-(5), 63.2520(e)(5)(i), [G]63.2520(e)(5)(ii)-(iii), 63.2520(e)(6)-(7), (e)(9)

TCEQ 10018 (APDG 5939v2, Revised 06/15) OP-REQ3 - Applicable Requirements Summary  
This form is for use by sources subject to air quality permit requirements and may be revised periodically. (Title V Release 11/08)

**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
February 14, 2024	O2215	RN110300126

Unit ID No.	Registration No.	PBR No.	Registration Date
B77APFU1	105203 106311	106.261	11/01/2003
B77APFU1	108295 148427	106.261 106.262	11/01/2003
B77APCF401	105203	106.261	11/01/2003
B77APCF402	105203	106.261	11/01/2003
B77APD132	148427	106.261 106.262	11/01/2003 11/01/2003
B77APPVAV	Unknown	106.261 106.262	11/01/2003 11/01/2003
B78APF1	142435	106.261	11/01/2003
B78APST5	108295	106.261 106.262	11/01/2003 11/01/2003

**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
February 14, 2024	O2215	RN110300126

Unit ID No.	PBR No.	Version No./Date
B77APCT1	106.371	09/04/2000
B78APF1 B77APFU1	106.263	11/01/2001
B77APFU1	106.473	09/04/2000
B77APLR133	106.473	09/04/2000
B77APSC01	106.454	11/01/2000
B78APFU1	106.124	09/04/2000
B78APPTT1	106.124	09/04/2000

**Permit By Rule Supplemental Table (Page 4)**  
**Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
February 14, 2024	O2215	RN110300126

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B77APFU1	106.261 106.262	105203 106311	Maintain PBR documentation
B77APFU1	106.261 106.262	108295 148427	Maintain PBR documentation
B77APCF401	106.261	105203	Maintain PBR documentation
B77APCF402	106.261	105203	Maintain PBR documentation
B77APD132	106.261 106.262	148427	Maintain PBR documentation
B77APPVAV	106.261 106.262	11/01/2003 11/01/2003	Maintain PBR documentation
B78APF1	106.261	142435	Maintain PBR documentation
B78APST5	106.261 106.262	11/01/2003 11/01/2003	Maintain PBR documentation

**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
February 14, 2024	O2215	RN110300126

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B77APCT1	106.371	09/04/2000	Circulation rate is measured, and TDS samples are taken
B78APF1 B77APFU1	106.263	11/01/2001	Track emissions on a 12-month rolling basis
B77APFU1	106.473	09/04/2000	Maintain records of type of liquid loaded/unloaded
B77APLR133	106.473	09/04/2000	Maintain records of type of liquid loaded/unloaded
B77APSC01	106.454	11/01/2000	Maintain records of the solvent TVP and drain area of the cold solvent cleaner
B78APFU1	106.124	09/04/2000	Maintain PBR documentation and track emissions
B78APPTT1	106.124	09/04/2000	Maintain PBR documentation and track emissions

TCEQ-20875 (APD-ID 102v1, revised 05/22) OP-PBR SUP  
This form for use by facilities subject to air quality permit requirements and  
may be revised periodically (Title V IMS Release 05/20)

## **Section 4 – Compliance Certification Forms**

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

Date: February 14, 2024	RN No.: RN110300126	Permit No.: O2215
Area Name: Adhesive Polymers Plant	Customer Reference No.: CN605483213	

- 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**

<b>A. Compliance Plan — Future Activity Committal Statement</b>	
<p>The <i>Responsible Official</i> commits, utilizing reasonable effort, to the following:          As the responsible official it is my intent that all emission units shall continue to be in compliance with all applicable requirements they are currently in compliance with, and all emission units shall be in compliance by the compliance dates with any applicable requirements that become effective during the permit term.</p>	
<b>B. Compliance Certification — Statement for Units in Compliance*</b> (Indicate response by entering an “X” in the appropriate column)	
1. With the exception of those emission units listed in the Compliance Schedule section of this form (Part 2, below), and based, at minimum, on the compliance method specified in the associated applicable requirements, are all emission units addressed in this application in compliance with all their respective applicable requirements as identified in this application?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. If the response to Item B.2, above, is “Yes,” indicate the total number of Part 2 attachments included in this submittal. <i>(For reference only)</i>	
<p>* 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.</p>	

TCEQ - 10100 (APDG 5876v4, Revised 07/17) OP-ACPS

This form is for use by sources subject to air quality permit requirements and may be revised periodically.

## **Section 5 – Alternative Means of Control (AMOC)**



Buddy Garcia, *Chairman*  
Larry R. Soward, *Commissioner*  
Bryan W. Shaw, Ph.D., *Commissioner*  
Glenn Shankle, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

January 23, 2008

Mr. Joel Courtwright  
Sr. Environmental Specialist  
Dow Chemical Company  
2301 N. Brazosport Blvd.  
Freeport, TX 77541-3257

Re: Testing Waiver Request for the APP Flare, Texas Commission on Environmental Quality (TCEQ) Permit No. 8567, Emission Point Number (EPN) B78F1, Air Account No. BL-0082-R, RN100225945, CN600356976 Subject to title 40 Code of Federal Regulations Part 63 (40 CFR 63), Subpart FFFF.

Dear Mr. Courtwright:

The purpose of this letter is to respond to your November 5, 2007 request to waive testing the APP Flare, EPN B78F1 based upon 40 CFR 63, Subpart A, 63.7(e)(2)(iv). The flare flow rate and net heating value of the gas combusted are continuously monitored by the instruments noted below:

GE Panametrics ultrasonic flowmeter, Model GM868-1-11-21004-FM-S, Serial # 1693

Siemens Maxum II Gas Chromatograph, Serial # 5060380001

These instruments are installed, operated, and maintained according to the requirements of 30 Texas Administrative Code Chapter 115, §115.725(d), and may demonstrate by other means to the TCEQ that the facility is in compliance with the standard.

40 CFR 60, §60.18(c)(1) and 40 CFR 63, §63.11(b)(4) require flares be designed for smokeless operations. Compliance with the design requirement does not eliminate the need to confirm proper operation, therefore the request to waive Method 22 testing is denied.

Mr. Joel Courtwright  
January 23, 2008  
Page 2

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. If you have any questions, please contact me at (512) 239-1676.

Sincerely,

A handwritten signature in cursive script that reads "John R. Smith".

John R. Smith  
Air Program Support Section  
Field Operations Support Division

JRS/

cc: Mr. David Garcia, 6EN-A, USEPA Region 6, 1445 Ross Avenue, Suite 1200, Dallas,  
Texas 75202-2733

Mr. Joel Anderson, Air Section Manager, TCEQ Field Operations Division, Houston  
Regional Office