From: Newman, Susan <snewman@westlake.com>

Sent: Monday, January 27, 2025 1:59 PM

To: Kyle Murray

Subject: RE: Working Draft Permit -- FOP O4648/Project 36670, Westlake Epoxy

INC, Westlake Deer Park

Attachments: OP-SUM 10007.pdf

Follow Up Flag: Follow up Flag Status: Flagged

Good afternoon,

Attached to this email you will find the updated OP-SUM form and the associated OP-CRO1 form.

I looked through the public notice letter and am working towards the necessary notices.

Thank you.



Susan Newman, CHMM | Environmental and Security Lead snewman@westlake.com | T. 281-727-3153 | C. 281-546-5942

Westlake Epoxy, a Westlake company

5900 Highway 225, Gate 7B, Deer Park, Texas 77536 | www.westlake.com

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

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

I. Identifying	Information	T SIND							
RN: 102 590 775		CN: 605 982 53	37 Account No.: HX-2786-H						
Permit No.: O-01	042 O4648		Project No.: 3667	0					
Area Name: West	lake Deer Park – Bl	PA	Company Name:	Westlake Epoxy Inc.					
II. Certification	on Type (Please ma	rk the appropria	te box)						
Responsible C	fficial		Duly Author	rized Representative					
III. Submittal	Гуре (Please mark	the appropriate b	oox) (Only one res _l	oonse can be accepted	per form)				
SOP/TOP Init	ial Permit Applicati	on Upda	te to Permit Applic	eation					
GOP Initial Pe	ermit Application	Perm	it Revision, Renew	al, or Reopening					
Other:	Submission of the f	Collowing form up	odates: OP-SUM	0007 (units A20600,	BPA4FE, V18571				
IV. Certification	on of Truth								
This certification only.	This certification does not extend to information which is designated by the TCEQ as information for reference only.								
I, P (Certifier	rashanth Hejmadi Name printed or ty	ped) certi	fy that I am the	RO (RO or D.	AR)				
	information and be on the specific date				nformation dated during				
	er a Time Period Ol t valid without docu			tion. This section mus	t be completed. The				
Time Period: Fro	m		to						
		Start Date		End Date	2				
Specific Dates:	01/27/2025 Date I	Date 2 D	ate 3 Date	4 Date 5	Date 6				
Signature:	Presheatel	lega Q'		Signature Date:	1/27/2025				
Title:	Plant Manager								

Texas Commission on Environmental Quality Federal Operating Permit Program Individual Unit Summary Form OP-SUM Table 1

Date	Permit No.	Regulated Entity No.
12/13/2024 1/27/2025	O1942- O4648	RN102590775

Unit/Process ID No.	Applicable Form	Unit Name/Description	CAM	Preconstruction Authorizations 30 TAC Chapter 116/30 TAC Chapter 106	Preconstruction Authorizations Title I	Group ID No.
A20600	OP-UA7	FLARE		18738 106.261/11/01/2003[155623] 106.262/11/01/2003[155623]		5
BPA4FE	OP-UA12	FUGITIVES		18738 106.261/11/01/2003[155623] 106.262/11/01/2003[155623]		
V18571	OP-UA3 OP-REQ2	TANK		106.476/09/04/2000[155623]		
No changes	То	Information	Below			
A18258	OP-UA15	BAGGING DUST COLLECTOR		18738		
A1921	OP-UA15	RAILCAR FILTER		18738		
AE40600	OP-UA15 OP-REQ2	ANALYZER		18738		
AE40601	OP-UA15 OP-REQ2	ANALYZER		18738		3

TCEQ 10007 (APDG 5837v9, Revised 05/20) OP-SUM This form is for use by facilities subject to air quality permit requirements and may be revised periodically. From: Kyle Murray < Kyle.Murray@tceq.texas.gov>

Sent: Tuesday, January 21, 2025 12:54 PM **To:** Newman, Susan <snewman@westlake.com>

Subject: [EXT] RE: Working Draft Permit -- FOP O4648/Project 36670, Westlake Epoxy INC, Westlake

Deer Park

Good afternoon Ms. Newman,

TCEQ will be mailing out the public notice letter tomorrow, January 22nd, but my team leader did come across an additional discrepancy with the Form OP-SUM (12/13/2024 date). This issue will not hold up the application process but will need to be resolved by **Wednesday, January 29th**.

Regarding the Form OP-SUM, PBRs that have registration numbers were not listed correctly. Please refer to the form instructions - <u>TCEQ Form 10007 - Individual Unit Summary Form OP-SUM Instructions</u> – and address the following discrepancies:

- Unit ID **A20600** PBR and effective PBR date missing (the date listed here should be the effective PBR date and not the registration date.)
- Unit ID **BPA4FE** PBR and effective PBR date missing.
- Unit ID **V18571** Effective PBR date missing.

We are requesting this update so that we can both have the correct form for our files. Please let me know if you have any questions. Thank you!

Sincerely,

Kyle J. Murray

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

Phone: (512) 239-1279 Fax: (512) 239-1400



How are we doing? Fill out our online customer satisfaction survey

at www.tceq.texas.gov/customersurvey

From: Newman, Susan <snewman@westlake.com>

Sent: Tuesday, January 14, 2025 1:31 PM

To: Kyle Murray

Subject: FW: Working Draft Permit -- FOP O4648/Project 36670, Westlake Epoxy

INC, Westlake Deer Park

Attachments: SOP - O4648 Westlake Epoxy, Inc. (Initial, 36670).docx

Thank you for email the working draft permit. I only found one area that I would recommend for an update.

Page 63 of 67 - New Source Review Authorization References by Emissions Unit

 C5LOAD_UN has Emission Name/Description of FLARE, but should be called PENTANE TRANSFER OPERATION as referenced on the OP-SUM form.

If you have other questions, please let me know.



Susan Newman, CHMM | Environmental and Security Lead snewman@westlake.com | T. 281-727-3153 | C. 281-546-5942 Westlake Epoxy, a Westlake company

5900 Highway 225, Gate 7B, Deer Park, Texas 77536 | www.westlake.com

From: Kyle Murray < Kyle.Murray@tceq.texas.gov>

Sent: Wednesday, January 8, 2025 8:08 AM **To:** Newman, Susan <snewman@westlake.com>

Subject: [EXT] RE: Working Draft Permit -- FOP O4648/Project 36670, Westlake Epoxy INC, Westlake

Deer Park

Good morning Ms. Newman,

Attached is a revised WDP including the following changes from your previous correspondence:

- 1. The following PBRs were removed: 106.122/09/04/2000, 51/05/04/1994, 80/02/26/1992, 80/08/30/1988, 106/01/31/1994, 106/07/20/1992, 106/10/08/1996, 118/02/26/1992
 - a. PBR No. 106/09/12/1996 was updated to 106/06/07/1996
- 2. Units DIESLTK-FD and GASTK-FD were added to the permit.
 - a. Permit shields were granted for 40 CFR Part 63, Subpart G 63.110(a) for both new units and are included in the WDP.

- b. Permit shield for 30 TAC Chapter 115.217(a)(1) was not granted because unit DIESLTK-FD would still have some requirements according to \$115.217(a)(1). These requirements are included in the WDP.
- 3. Permit shield for 40 CFR Part 63, Subpart Q 63.400(a) for unit CWT14 was removed from the permit.
- 4. PCAs were updated for units indicated on the provided OP-SUM.

Please review the revised WDP and submit to me any additional comments by **Tuesday, January 14.** Thank you!

Sincerely,

Kyle J. Murray

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

Phone: (512) 239-1279 Fax: (512) 239-1400



How are we doing? Fill out our online customer satisfaction survey

at www.tceq.texas.gov/customersurvey

From: Newman, Susan <snewman@westlake.com>
Sent: Wednesday, December 18, 2024 3:51 PM

To: Kyle Murray

Subject: RE: Working Draft Permit -- FOP O4648/Project 36670, Westlake Epoxy

INC, Westlake Deer Park

Attachments: OP-CRO1 Certification by Responsible Official 10009 - 241213

Submittal.pdf

Follow Up Flag: Follow up Flag Status: Flagged

Good afternoon,

Attached please find the Certification form for the 12/13/2024 submittal. I was able to work with the Plant Manager today for the signature as we had staggered vacations before this time.

Let me know if you have additional questions.

Thank you.



Susan Newman, CHMM | Environmental and Security Lead snewman@westlake.com | T. 281-727-3153 | C. 281-546-5942

Westlake Epoxy, a Westlake company

5900 Highway 225, Gate 7B, Deer Park, Texas 77536 | www.westlake.com

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

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

I. Identify	ing Information				
RN: 102 590 7	75	CN: 605 982 5	37	Account No.:	НХ-2786-Н
Permit No.: O	01942 O4648		Project No.: 360		
Area Name: W	estlake Deer Park – F	BPA	Company Name	e: Westlake Epoxy II	nc.
II. Certific	ation Type (Please m	ark the appropria	ite box)		
Responsibl	e Official		Duly Auth	orized Representativ	ve
III. Submitt	al Type (Please mark	the appropriate	box) (Only one re	sponse can be accep	ted per form)
and the second s	nitial Permit Applicat	1 grant and	te to Permit Appl		an ankani
GOP Initial	Permit Application	Perm	it Revision, Rene	wal, or Reopening	
Other:	Submission of the 10017 PG 1, OP-S	following form u UM 10007, OP-U	pdates: OP-PBRS IA4 10041	SUP 20875, OP-REC	Q1 10043 PG 88, OP-REQ2
IV. Certifica	ition of Truth		MARKET THE THE TANK		Transcore and the second transcore
I,(Certifi	Prashanth Hejmadi ier Name printed or ty	certi	fy that I am the _	(RO or	DAR)
the time period	or on the specific date	elief formed after e(s) below, are tru	reasonable inquir le accurate and c	y, the statements and	d information dated during
Note: Enter Ei		R Specific Date(s)	for each certifica	50	ust be completed. The
Time Period: F	rom		to		
		Start Date		End Do	ate
Specific Dates		Date 2 Do	ate 3 Date	4 Date 5	Date 6
Signature:	Prashant	Heym Di		Signature Date:	12/18/2024
Title:	Plant Manager				

From: Newman, Susan <snewman@westlake.com>

Sent: Friday, December 13, 2024 4:24 PM

To: Kyle Murray

Subject: RE: Working Draft Permit -- FOP O4648/Project 36670, Westlake Epoxy

INC, Westlake Deer Park

Attachments: OP-PBRSUP 20875.pdf; OP-REQ1 Area Wide Applicability 10043 Page

88.pdf; OP-REQ2 Negative Applicability 10017 Page 1.pdf; OP-SUM

10007.pdf; OP-UA4 Load Unload 10041.pdf

Good afternoon,

Attached are the updated forms as requested. As I was preparing the data for these forms, I noticed a few updates needed on other forms. They are included as well. I have tried to make notations as to the changes with these versions, but if clarification is needed, please let me know.

When the Plant Manager returns to the office next week from vacation, I will have him sign the certification form and will send it to you.

Thank you for your continued assistance with this project.



Susan Newman, CHMM | Environmental and Security Lead snewman@westlake.com | T. 281-727-3153 | C. 281-546-5942

Westlake Epoxy, a Westlake company

5900 Highway 225, Gate 7B, Deer Park, Texas 77536 | www.westlake.com

Loading/Unloading Operations Attributes Form OP-UA4 (Page 1)

Federal Operating Permit Program

Table 1a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115) Subchapter C: Loading and Unloading of Volatile Organic Compounds Texas Commission on Environmental Quality

Date	Permit No.:	Regulated Entity No.	
11/30/2023 12/13/2024	O1942 O4648	RN102590775	

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
C5LOAD_UN	R5212-1	OTHER	NONE		VOC1	ВОТН	0.5+	20K-	
MSHLOAD_UN	R5212-1	OTHER	NONE		VOC1	ВОТН	0.5+	20K-	
PHNLOAD_UN	R5212-2	OTHER	NONE		VOC1	ВОТН	0.5-		
IPELOAD_UN	R5211-1	OTHER	NONE		VOC1	ВОТН	0.5+	20K-	
LPELOAD_UN	R5211-2	OTHER	NONE		VOC1	ВОТН	0.5-		
CAT-UNLOAD	R5211-2	OTHER	NONE		VOC1	UNLOAD	0.5-		
Below Unit(s)	Added with	12/13/2024	Version						
DISLTK-FD	R5211-3	OTHER	NONE		VOC1	UNLOAD	0.5-		
GASTK-FD	R5211-4	OTHER	NONE		GAS1	UNLOAD	0.5+	20K-	

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.		
11/30/2023 12/13/2024	O1942 O4648	RN102590775		

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
C5LOAD_UN	R5212-1							
MSHLOAD_UN	R5212-1							
PHNLOAD_UN	R5212-2							
IPELOAD_UN	R5211-1							
LPELOAD_UN	R5211-2							
CAT-UNLOAD	R5211-2							
Below Unit(s)	Added with	12/13/2024	Version					
DISLTK-FD	R5211-3							
GASTK-FD	R5211-4							

Loading/Unloading Operations Attributes Form OP-UA4 (Page 9)

Federal Operating Permit Program

Table 7a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart G: National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Transfer Operations Texas Commission on Environmental Quality

Date	Permit No.:	Regulated Entity No.
11/30/2023 12/13/2024	O1942 O4648	RN102590775

Unit ID No.	SOP Index No.	Transfer Rack Type	Subject to Subpart BB	Compliance Options	Closed Vent System	Hard Piping
C5LOAD_UN	63G-1	GRP2	NO			
PHNLOAD_UN	63G-1	GRP2	NO			
IPELOAD_UN	63G-1	GRP2	NO			
LPELOAD_UN	63G-2	GRP2	NO			

Texas Commission on Environmental Quality Federal Operating Permit Program Individual Unit Summary Form OP-SUM Table 1

Date	Permit No.	Regulated Entity No.
12/13/2024	O1942 O4648	RN102590775

Unit/Process ID No.	Applicable Form	Unit Name/Description	CAM	Preconstruction Authorizations 30 TAC Chapter 116/30 TAC Chapter 106	Preconstruction Authorizations Title I	Group ID No.
A18258	OP-UA15	BAGGING DUST COLLECTOR		18738		
A1921	OP-UA15	RAILCAR FILTER		18738		
A20600	OP-UA7	FLARE		18738 Reg # 155623 Reg Date 4/17/2019		
AE40600	OP-UA15 OP-REQ2	ANALYZER		18738		
AE40601	OP-UA15 OP-REQ2	ANALYZER		18738		
BPA4	OP-UA15	PROCESS VENTS		18738		
BPA4FE	OP-UA12	FUGITIVES		18738 PBR 106 / 6/7/1996 Reg # 155623 Reg Date 4/17/2019		
BPA4WW	OP-UA19	BPA4 WASTEWATER COLLECTION		18738		
BPA-SULF	OP-UA3 OP-REQ2	SULFURIC ACID TANK		106.472/09/04/2000		

TCEQ 10007 (APDG 5837v9, Revised 05/20) OP-SUM This form is for use by facilities subject to air quality permit requirements and may be revised periodically.

Unit/Process ID No.	Applicable Form	Unit Name/Description	CAM	Preconstruction Authorizations 30 TAC Chapter 116/30 TAC Chapter 106	Preconstruction Authorizations Title I	Group ID No.
C5LOAD_UN	OP-UA4	PENTANE TRANSFER OPERATION		106.473/09/04/2000		
CAT-UNLOAD	OP-UA4 OP-REQ2	CATALYST TRANSFER OPERATION		106.261/11/01/2003 106.262/11/01/2003		
DISLTK	OP-UA3 OP-REQ2	DIESEL FUEL TANKS		106.412/09/04/2000		
DISLTK-FD	OP-UA4 OP-REQ2	DIESEL FUEL TRANSFER OPERATION		106.473/09/04/2000		
GASTK	OP-UA3 OP-REQ2	GASOLINE TANKS		106.412/09/04/2000		
GASTK-FD	OP-UA4 OP-REQ2	GASOLINE TRANSFER OPERATION		106.473/09/04/2000		
IPELOAD_UN	OP-UA4	IPE TRANSFER OPERATION		106.473/09/04/2000		
LPELOAD_UN	OP-UA4	LIQUID PHENOLIC EXTENDER TRANSFER OPERATION		106.472/09/04/2000		
MSHLOAD_UN	OP-UA4 OP-REQ2	PROCESS VENTS		18738		
PHNLOAD_UN	OP-UA4	PHENOL TRANSFER OPERATION		106.472/09/04/2000		
PROBPA	OP-UA60	PROCESS VENTS		18738		
S18509	OP-UA15	BAGGING DUST COLLECTOR		18738		

Unit/Process ID No.	Applicable Form	Unit Name/Description	CAM	Preconstruction Authorizations 30 TAC Chapter 116/30 TAC Chapter 106	Preconstruction Authorizations Title I	Group ID No.
S18512	OP-UA15	BAGGING DUST COLLECTOR		18738		
T147	OP-UA3 OP-REQ2	TANK		18738		
T1850	OP-REQ2	TANK		18738		
T18507	OP-UA3 OP-REQ2	TANK		18738		
T18508	OP-UA3 OP-REQ2	TANK		18738		
T18509	OP-UA3 OP-REQ2	TANK		18738		
T1851B	OP-REQ2	TANK		18738		
T18520	OP-REQ2	TANK		18738		
T18521	OP-UA3 OP-REQ2	TANK		18738		
T1857	OP-UA3 OP-REQ2	TANK		18738		
T20100	OP-UA3 OP-REQ2	TANK		18738		
T20601	OP-UA2 OP-REQ2	TANK		18738		
T20801	OP-UA3 OP-REQ2	TANK		18738 106.472/09/04/2000		
T20802	OP-UA3 OP-REQ2	TANK		18738		
T20907	OP-REQ2	LUBE OIL TANK		18738		

Unit/Process ID No.	Applicable Form	Unit Name/Description	CAM	Preconstruction Authorizations 30 TAC Chapter 116/30 TAC Chapter 106	Preconstruction Authorizations Title I	Group ID No.
T20908	OP-REQ2	LUBE OIL TANK		18738		
T20909	OP-REQ2	LUBE OIL TANK		18738		
T2133	OP-UA3 OP-REQ2	TANK		18738		
T2413B	OP-UA3 OP-REQ2	TANK		18738		
T2414	OP-UA3 OP-REQ2	TANK		18738		
T2415	OP-UA3 OP-REQ2	TANK		18738		
T6005	OP-REQ2	TANK		18738		
T9554	OP-UA3 OP-REQ2	TANK		18738		
V18571	OP-UA3 OP-REQ2	TANK		106.476/09/04/2000		
V20903	OP-REQ2	TANK		18738		
V2426B	OP-UA3 OP-REQ2	TANK		18738		

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

Date	Permit No.	Regulated Entity No.
9/11/2024 12/13/2024	01942- 04648	RN102590775

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
	NEW 12/13/2024	DIESLTK-FD	OP-UA4 OP-REQ2	40 CFR Part 63, Subpart G	40 CFR 63.110(a)	Unit is not a transfer rack by definition under MACT F because the unit does not fill tank trucks and/or railcars.
	NEW 12/13/2024	DIESLTK-FD	OP-UA4 OP-REQ2	30 TAC Chapter 115	30 TAC Chapter 115.217(a)(1)	Transferred liquid has a maximum true vapor pressure less than 0.5 psia
	NEW 12/13/2024	GASTK-FD	OP-UA4 OP-REQ2	40 CFR Part 63, Subpart G	40 CFR 63.110(a)	Unit is not a transfer rack by definition under MACT F because the unit does not fill tank trucks and/or railcars.
Unit	Below is	Contained in	Title V permit	O1940	Remove from O4648	
		CWT14	OP REQ2	40 CFR Part 63, Subpart Q	40 CFR 63.400(a)	No Chromium based cooling tower chemical used after September 8, 1994.

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

Date:	11/30/2023 9/11/2024 12/13/2024
Permit No.:	O1942 O4648
RN No.:	RN102590775

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 88				
XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)				
	AC Chapter 106) for the Application Area			
	eviously referred to as standard exemptions) that are required to be listed in the			
PBR No.: 106.261	Version No./Date: November 1, 2003			
PBR No.: 106.262	Version No./Date: November 1, 2003			
PBR No.: 106.412	Version No./Date: September 4, 2000			
PBR No.: 106.472	Version No./Date: September 4, 2000			
PBR No.: 106.473	Version No./Date: September 4, 2000			
PBR No.: 106.476	Version No./Date: September 4, 2000			
PBR No.: 106	Version No./Date: September 12, 1996 June 7, 1996			
PBR No.: 106.122	Version No./Date: September 4, 2000			
PBR No.: 51	Version No./Date: May 4, 1994			
PBR No.: 80	Version No./Date: February 26, 1992 August 30, 1988			
PBR No.: 106	Version No./Date: January 31, 1994 July 20, 1992			
PBR No.: 106	Version No./Date: October 8, 1996			
PBR No.: 118	Version No./Date: February 26, 1992			
PBR No.:	Version No./Date:			
PBR No.:	Version No./Date:			
PBR No.:	Version No./Date:			
♦ J. Municipal Solid Waste and Industrial Hazardous Waste Permits With an Air Addendum				
Permit No.:	Issuance Date:			
Permit No.:	Issuance Date:			
Permit No.:	Issuance Date:			
Permit No.:	Issuance Date:			

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
9/11/2024 12/13/2024	O1942 O4648	RN102590775

Unit ID No.	Registration No.	PBR No.	Registration Date
A20600	155623	106.261 (Facilities (Emission Limitations))	4/17/2019
A20600	155623	106.262 (Facilities (Emission and Distance Limitations))	4/17/2019
BPA4FE	155623	106.261 (Facilities (Emission Limitations))	4/17/2019
BPA4FE	155623	106.262 (Facilities (Emission and Distance Limitations))	4/17/2019
V18571	155623	106.476 (Pressurized Tanks or Tanks Vented to Control)	4/17/2019
The Units below have been fully integrated into the NSR permit as noted on OP-SUM.	Requirements for these units are included within the NSR Permit	Special Conditions and Maximum Allowable Emissions.	
BPA4WW	53269	106.262 (Facilities (Emission and Distance Limitations))	12/6/2002
T1850	53269	106.472 (Organic and Inorganic Liquid Loading and Unloading)	12/6/2002
T18520	53269	106.472 (Organic and Inorganic Liquid Loading and Unloading)	12/6/2002
T20907	53269	106.472 (Organic and Inorganic Liquid Loading and Unloading)	12/6/2002
T20908	53269	106.472 (Organic and Inorganic Liquid Loading and Unloading)	12/6/2002

Unit ID No.	Registration No.	PBR No.	Registration Date
T20909		106.472 (Organic and Inorganic Liquid Loading and Unloading)	12/6/2002
V20903		106.472 (Organic and Inorganic Liquid Loading and Unloading)	12/6/2002

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
9/11/2024 12/13/2024	O1942 O4648	RN102590775

Unit ID No.	PBR No.	Version No./Date
BPA4FE	106 (Facilities, or physical or operational changes to a facility)	June 7, 1996
BPA-SULF	106.472 (Organic and Inorganic Liquid Loading and Unloading)	September 4, 2000
C5LOAD_UN	106.473 (Organic Liquid Loading and Unloading)	September 4, 2000
CAT-UNLOAD	106.261 (Facilities (Emission Limitations))	November 1, 2003
CAT-UNLOAD	106.262 (Facilities (Emission and Distance Limitations))	November 1, 2003
DISLTK	106.412 (Fuel Dispensing)	September 4, 2000
DISLTK-FD	106.473 (Organic Liquid Loading and Unloading)	September 4, 2000
GASTK	106.412 (Fuel Dispensing)	September 4, 2000
GASTK-FD	106.473 (Organic Liquid Loading and Unloading)	September 4, 2000
IPELOAD_UN	106.473 (Organic Liquid Loading and Unloading)	September 4, 2000
LPELOAD_UN	106.472 (Organic and Inorganic Liquid Loading and Unloading)	September 4, 2000
PHNLOAD_UN	106.472 (Organic and Inorganic Liquid Loading and Unloading)	September 4, 2000
T20801	106.472 (Organic and Inorganic Liquid Loading and Unloading)	September 4, 2000
The Units below have been fully integrated into the NSR permit as noted on OP-SUM.	Requirements for this unit are included within the NSR Permit Special Conditions and Maximum Allowable 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)

Unit ID No.	PBR No.	Version No./Date	
A20600	80 (Smokeless Gas Flare)	August 30, 1988	
Pressurized vessel vents to Unit ID BPA4	106 (Facilities, or physical or operational changes to a facility)	July 20, 1992	
T20802	51 (Liquid loading or unloading equipment including tanks, change of service of material)	May 4, 1994	

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
5/22/2024 9/11/2024	O1942 O4648	RN102590775

PBR No.	Version No./Date
PBR No.: 106.122 (Bench Scale Laboratory Equipment)	September 4, 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
9/11/2024 12/13/2024	O1942 O4648	RN102590775

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
A20600	106.261 106.262	Reg # 155623 Reg Date 4/17/2019	The following parameters or activities shall be conducted, monitored or calculated to ensure proper flare operation per NSR Permit 18738 Special Conditions: heating value, velocity, flame present at all times, continuous monitoring of flame presence, calibration of instrumentation per manufacturer's recommendation, visible emissions < 5 minutes in a 2 hour period, no flare bypass.
BPA4FE	106.261 106.262	Reg # 155623 Reg Date 4/17/2019	Valves, connectors and pressure relief valves are integrated into the LDAR monitoring schedule compliant with 30 TAC 115 Division 3 and 40 CFR 63 Subpart H.
V18571	106.476	Reg # 155623 Reg Date 4/17/2019	Throughput volume and withdrawal frequencies are tracked for compliance.
BPA4FE	106	Vers 6/7/1996	Components are integrated into the LDAR monitoring schedule compliant with 30 TAC 115 Division 3 and 40 CFR 63 Subpart H.
BPA-SULF	106.472	Vers 9/4/2000	Material and throughput volume are tracked for compliance.
C5LOAD_UN	106.473	Vers 9/4/2000	Loading amounts are tracked for compliance with daily volumes over a 30 day period.
CAT-UNLOAD	106.261 106.262	Vers 11/1/2003 Vers 11/1/2003	Material and throughput volume are tracked for compliance.
DIESLTK	106.412	Vers 9/4/2000	Throughput amounts are tracked for compliance.
DIESLTK-FD	106.473	Vers 9/4/2000	Throughput amounts are tracked for compliance.
GASTK	106.412	Vers 9/4/2000	Throughput amounts are tracked for compliance.

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
GASTK-FD	106.473	Vers 9/4/2000	Loading amounts are tracked for compliance with daily volumes over a 30 day period.
IPELOAD_UN	106.473	Vers 9/4/2000	Loading amounts are tracked for compliance with daily volumes over a 30 day period.
LPELOAD_UN	106.472	Vers 9/4/2000	Material and throughput volume are tracked for compliance.
PHNLOAD_UN	106.472	Vers 9/4/2000	Material and throughput volume are tracked for compliance.
T20801	106.472	Vers 9/4/2000	Tank throughput and composition used to confirm tank within emission estimates.
The Units below have been fully integrated	into the NSR permit as noted on OP-SUM.	Requirements are included within the NSR	Permit Special Conditions and Maximum Allowable Emissions.
A20600	80 (Smokeless Flare)	Vers 8/30/1988	
BPA4 Pres Vessel Vents	106 (Fac Changes)	Vers 7/20/1992	
BPA4FE	106 (Fac Changes)	Vers 6/7/1996	
BPA4WW	106.262	Reg # 53269 Reg Date 12/6/2002	
T1850	106.472	Reg # 53269 Reg Date 12/6/2002	
T18520	106.472	Reg # 53269 Reg Date 12/6/2002	
T20802	51 (Liq tank change serv)	Vers 5/4/1994	
T20907	106.472	Reg # 53269 Reg Date 12/6/2002	
T20908	106.472	Reg # 53269 Reg Date 12/6/2002	
T20909	106.472	Reg # 53269 Reg Date 12/6/2002	
V20903	106.472	Reg # 53269 Reg Date 12/6/2002	

From: Kyle Murray < Kyle.Murray@tceq.texas.gov Sent: Wednesday, December 4, 2024 2:53 PM

To: Newman, Susan < snewman@westlake.com>

Subject: [EXT] RE: Working Draft Permit -- FOP O4648/Project 36670, Westlake Epoxy INC, Westlake

Deer Park

Good afternoon Ms. Newman,

In a final review before public notice, my technical specialist identified some additional issues regarding your application. Please address the following items by **Friday**, **December 13**th.

- Please submit an OP-SUM form listing each applicable unit and their preconstruction authorizations. I have linked the form instructions below for your reference. For units using both the NSR permit and PBRs, please include both types of authorizations so it is clear nothing is being removed. TCEQ Form 10007 - Individual Unit Summary Form OP-SUM Instructions
- 2. The OP-PBRSUP submitted on 09/11/2024 was not correctly filled out, specifically Table D. Each unit listed on Table A or B of the OP-PBRSUP should have a row on Table D. Regardless of whether the unit appears in the permit or whether a specific PBR includes monitoring, Title V requires periodic monitoring for all units subject to an emission limitation or standard. The purpose of this table is to show how sources using a PBR are fulfilling the periodic monitoring requirement. There needs to be some type of periodic monitoring, which can consist of recordkeeping, that is representative of the unit's compliance with the limits in a PBR itself, the limits in a PBR registration (if registered), and with the general emission limits of 30 TAC \$106.4 (which apply to all PBRs).
 - a. For BPA4FE, rather than cross-referencing certain index numbers, please briefly summarize what is being monitored and/or recorded. For example, "Monitor pumps and valves monthly for leaks", or whatever is accurate for this fugitive unit. A reference to a permit or other rule can be included, but a description still needs to be written out. (We do not mean copy and paste all the text from another permit or rule, but a brief and clear summary is needed.)
- 3. As PBR 106.122 was correctly moved to Table C of the OP-PBRSUP, it should also be removed from page 89 of the OP-REQ1. Please submit a corrected page with this change.

As a note, please remember to redate each updated form and also submit the updated OP-PBRSUP as a set of all four tables, even if not all are being changed. Thank you for your cooperation and do not hesitate to let me know if you have any questions.

Sincerely,

Kyle J. Murray

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

Phone: (512) 239-1279 Fax: (512) 239-1400



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From: Newman, Susan <snewman@westlake.com>
Sent: Wednesday, October 2, 2024 2:22 PM

To: Kyle Murray

Subject: RE: Working Draft Permit -- FOP O4648/Project 36670, Westlake Epoxy

INC, Westlake Deer Park

Attachments: OP-CRO1 Certification by Responsible Official 10009.pdf

Good afternoon,

Attached please find the OP-CRO1 form for the June 2024 submittals.

Please let me know if you have any additional questions.

Thank you.



Susan Newman, CHMM | Environmental and Security Lead snewman@westlake.com | T. 281-727-3153 | C. 281-546-5942

Westlake Epoxy, a Westlake company

5900 Highway 225, Gate 7B, Deer Park, Texas 77536 | www.westlake.com

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

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

I. Identifying Information							
RN: 102 590 775		CN: 605 982 53	17	Account No.	.: НХ-2786-Н		
Permit No.: O-01942 O4648			Project No.: 36670				
Area Name: Westlake Deer Park – BPA			Company Name: Westlake Epoxy Inc.				
II. Certificati	on Type (Please ma	rk the appropria	te box)				
Responsible (Official		☐ Duly Authorized Representative				
III. Submittal	Type (Please mark	the appropriate b	ox) (Only one re	sponse can be acce	pted per form)		
SOP/TOP Init	ial Permit Applicati	on Updat	te to Permit Appl	ication			
GOP Initial P	ermit Application	Permi	t Revision, Rene	wal, or Reopening			
⊠ Other:	Submission of Plot	Plan and Process	Flow Diagram				
IV. Certificati	on of Truth						
This certification	This certification does not extend to information which is designated by the TCEQ as information for reference only.						
I, <u>F</u> (Certifier	rashanth Hejmadi · Name printed or ty	certif ped)	fy that I am the _	(RO	RO or DAR)		
	n information and be				and information dated during		
Note: Enter Either a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).							
Time Period: Fro	om		to				
		Start Date		End	Date		
Specific Dates:	6/28/2024 Date 1	Date 2 De	ate 3 Date	2.4 Date 5	Date 6		
Signature:	Grashent,	Hejndi		Signature Date:	192/2024		
Title:	Plant Manager						

From: Newman, Susan

Sent: Tuesday, October 1, 2024 12:08 PM
To: Kyle Murray < Kyle. Murray @tceq.texas.gov >

Subject: RE: Working Draft Permit -- FOP O4648/Project 36670, Westlake Epoxy INC, Westlake Deer Park

Good afternoon,

Thank you for sending the updated working draft permit.

As I reviewed the draft and have no changes to request.

I have time set up with the site leader to obtain his signature on OP-CRO1 for the 06/28/2024. I will scan and email it to your attention.

Thank you again for your help with this permit.



Susan Newman, CHMM | Environmental and Security Lead snewman@westlake.com | T. 281-727-3153 | C. 281-546-5942 Westlake Epoxy, a Westlake company 5900 Highway 225, Gate 7B, Deer Park, Texas 77536 | www.westlake.com

From: Kyle Murray < Kyle. Murray@tceq.texas.gov>

Sent: Friday, September 20, 2024 2:54 PM

To: Newman, Susan <snewman@westlake.com>

Subject: [EXT] RE: Working Draft Permit -- FOP O4648/Project 36670, Westlake Epoxy INC, Westlake

Deer Park

Good afternoon Ms. Newman,

I have implemented the revisions addressed in your response and attached a revised WDP. Changes to the document are as follows:

- 1. Added NSPS VV permit shield entry for Unit ID BPA4FE and adjusted the wording for the negative applicability reason you provided to more closely match the rule text.
- 2. Removed 60VVALL requirements from Unit ID BPA4FE.
- 3. Updated the Chapter 115 Vent Gas Control requirements based off the revised unit attributes for Unit IDs AE40600 and AE40601.
- 4. Your justification for the proposed CAM Deviation Limits for Units A18258, S18509, and S18512 was deemed sufficient.

Please review the revised WDP and submit to me any additional comments by **Tuesday, October 1, 2024.** Thank you!

Additionally, please provide certification for the application update submitted on 06/28/2024 with your response. You can list that on the specific date section of form OP-CRO1. If you have any additional comments, please include that date in the section as well. You can submit the form in STEERS, or you may email me a scanned copy followed by the original in the mail.

Sincerely,

Kyle J. Murray

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

Phone: (512) 239-1279 Fax: (512) 239-1400



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From: Newman, Susan <<u>snewman@westlake.com</u>> Sent: Thursday, September 12, 2024 5:31 PM To: Kyle Murray <<u>Kyle.Murray@tceq.texas.gov</u>>

Subject: Re: Working Draft Permit -- FOP O4648/Project 36670, Westlake Epoxy INC, Westlake Deer Park

I neglected to attach the OPCRO1 to my previous email. Please find it attached here.

Thank you,

Susan Newman, CHMM | Environmental and Security Lead
snewman@westlake.com | T. 281-727-3153 | C. 281-546-5942
Westlake Epoxy, a Westlake company
5900 Highway 225, Gate 7B, Deer Park, Texas 77536 | www.westlake.com

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

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

I. Identifying Information					
RN: 102 590 775	CN: 605 982 5	37	Account No.: HX-2786-H		
Permit No.: O-01942 O4648		Project No.: 366	Project No.: 36670		
Area Name: Westlake Deer Park	- BPA	Company Name:	Company Name: Westlake Epoxy Inc.		
II. Certification Type (Pleas	e mark the approprie	ate box)			
Responsible Official		Duly Authorized Representative			
III. Submittal Type (Please m	ark the appropriate	box) (Only one res	sponse can be accepted per form)		
SOP/TOP Initial Permit Appl	ication Upda	ate to Permit Appli	ication		
GOP Initial Permit Application	on Perm	nit Revision, Renev	wal, or Reopening		
Other: Submission of	Working Draft Com	ments and Updated	d Forms		
IV. Certification of Truth					
This certification does not extend to information which is designated by the TCEQ as information for reference only. I, Prashanth Hejmadi certify that I am the RO (RO or DAR) and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete: Note: Enter Either a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).					
Time Period: From Specific Dates: 9/12/2024	Start Date	to	End Date		
Date 1		Date 3 Date	2.4 Date 5 Date 6		
Signature: Kashauti Heynesh' Signature Date: 9/12/2024					
Title: Plant Manage	r				

From: Kyle Murray < Kent: Thursday, September 12, 2024 4:44:54 PM">Keyle.Murray@tceq.texas.gov Sent: Thursday, September 12, 2024 4:44:54 PM

To: Newman, Susan < snewman@westlake.com>

Subject: [EXT] RE: Working Draft Permit -- FOP O4648/Project 36670, Westlake Epoxy INC, Westlake

Deer Park

Thank you for your response, Ms. Newman. I will review your comments and get back to you with a revised WDP and any additional comments.

I hope you enjoy your vacation!

Sincerely,

Kyle J. Murray

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

Phone: (512) 239-1279 Fax: (512) 239-1400



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From: Newman, Susan <<u>snewman@westlake.com</u>>
Sent: Thursday, September 12, 2024 4:37 PM
To: Kyle Murray <Kyle.Murray@tceq.texas.gov>

Subject: RE: Working Draft Permit -- FOP O4648/Project 36670, Westlake Epoxy INC, Westlake Deer Park

Thank you for sending the detailed list and the draft. I have attached various files for your review in addition to the comments I added below.

Please let me know if you have any additional questions.

NOTE: I am on vacation until September 24, 2024. I will address any communications between now and then when I return to the office.

Form OP-PBRSUP

- The OP-PBRSUP form submitted with your application incorrectly lists all PBRs on Table C, which is designated for all PBR authorizations that are not required to be identified in tables A, B, or D. Referencing the PBR table in the form instructions, PBR 106.122/09/04/2000 is the only one that should be listed on Table C. The remaining PBRs should be listed in Tables A (if registered) and B (claimed, not registered), and subsequently in Table D (monitoring for units in Tables A & B). Please update the OP-PBRSUP tables and redate the form upon completion.
- In addition, the version no./date that we request on our forms for the following PBRs is supposed to be the effective date of the PBR with which the unit is complying. It is not the date that the PBR was claimed. Therefore, the forms should reflect the corresponding effective dates listed on the "Outdated Standard Exemption Index" on the TCEQ website. Please correct the dates listed below on both the OP-PBRSUP and the OP-REQ1.
 - PBR 80/02/26/1992
 - PBR 106/01/31/1994
 - PBR 106/09/12/1996
 - PBR 106/10/08/1996
 - PBR 118/02/26/1992
- o OP-PBRSUP and the OP-REQ1 XII.I have been updated.

Form OP-REQ1 – NSR Permit No. 18738

- Section XII.G of the OP-REQ1 is for NSR authorizations with FCAA § 112(g) requirements. That means the permit contains case-by-case MACT requirements because no Part 63 subpart was promulgated by EPA for the appropriate source category. If NSR permit No. 18738 does not contain such requirements, it should instead be listed in Section XII.H of the OP-REQ1. Please confirm the correct section for the NSR permit and provide an updated page of the form if needed.
- The equipment included in NSR permit 18738 is required to comply with 40 CFR 63 Subparts F, G and H. The permit has been moved to Section XII.H of OP-REO1.
- Unit ID No. T19954 This ID number on the OP-REQ2 is listed as "T9954", as well as on other sections of the application. Please confirm which ID you'd like to use and update the applicable forms with the correct ID number.
 - The ID number should be listed as T9554. The following forms have been updated: OP-REQ2.
 The following forms did not require an update as the proper ID number (T9554) was previously listed: OP-UA3 Table 4a, Table 4b, Table 9a, Table 9b

Form OP-REQ2

- On page 2, there is a row with "OP-REQ2" listed as an ID number. It looks like data got shifted over into the wrong columns. I have entered this permit shield as a part of "BPA-SULF". Please verify the correct unit ID and add it to this row on the form.
 - Correction made on OP-REQ2
- All rows that list the regulation name as 40 CFR Part 63, Subpart F should list 40 CFR Part 63, Subpart G instead. *** Please correct these rows on the form.
 - Requested changes made on OP-REQ2
- o For the NSPS NNN shield for BPA4, the citation listed was 63.110(d)(4) but language in the reason was more similar to 63.110(d)(10). The reason was updated to be consistent with 63.110(d)(4). Please confirm this is correct.
 - Updating the Reason to be consistent with 63.110(d)(4) is correct.
- For the NSPS RRR shield for BPA4 the citation listed was 63.110(d)(7) but language in the reason was more similar to 63.110(d)(10). The reason was updated to be consistent with 63.110(d)(7). Please confirm this is correct.
 - Updating the Reason to be consistent with 63.110(d)(7) is correct.
- Updates have been made to the wording of various permit shields just to clarify or more closely follow rule language. If you have any issues or questions as you review the WDP, please let me know.

 ADDED: NSPS VV permit shield entry for BPA4FE has been added to OP-REQ2. An updated OP-UA12 Table 4a is attached to remove the 60VVALL requirements.

CAM Deviation Limits

- In reference to the selected CAM option numbers for the following unit ID numbers, please provide us with the most appropriate of the following: the most recent performance test data, the manufacturer's recommendations, engineering calculations, and/or historical data that would justify the proposed deviation limit in your application.
 - A18258 "Pressure drop shall be at least 0.5-inch water gauge pressure and shall not exceed 10 inches water gauge pressure."
 - S18509 "Pressure drop shall be at least 0.5-inch water gauge pressure and shall not exceed 10 inches water gauge pressure."
 - S18512 "Pressure drop shall be at least 0.5-inch water gauge pressure and shall not exceed 10 inches water gauge pressure."
- NSR permit 18738 SC 18 contains identical requirements requested as CAM parameters for this permit. August 2008, information was provided to the TCEQ as a basis to set the limits to satisfy the requirements during a renewal of NSR 3180. On September 29, 2008, the limits were implemented as NSR 3180 SC 16. On January 21, 2016, NSR 3180 was rolled into NSR 18738 and 3180 was cancelled. The CAM limits requested now exist in NSR 18738 SC 18.

Forms OP-UA15 and OP-MON – SOP Index Numbers

- We prefer that index numbers reflect the regulation applicable to the units. In your application the index number "R1111" is used to reflect both 30 TAC Chapter 111, Nonagricultural Processes (main standard 111.151(a)) and 30 TAC Chapter 111, Visible Emissions (main standard 111.111(a)(1)(B)). We have made the following changes to help differentiate the index numbers for main standard 111.151(a). These are for units A18258, S18509, and S18512. Kindly let me know if this is acceptable.
 - R1111-1 updated to "R1151-1"
 - R1111-2 updated to "R1151-2"
 - R1111-3 updated to "R1151-3"
- o If this terminology is preferred by the TCEQ, we are agreeable to the change.

Form OP-UA15 - Units AE40600 and AE40601

On Table 2a for Chapter 115, Vent Gas Controls, there is an error with the unit attributes. Based on the "100+" answer for Combined 24 Hour VOC Weight and the "612+" answer for VOC Concentration, these units are not meeting an exemption. However, VOC Concentration or Emission Rate at Maximum Operating Conditions was answered "Yes". That would suggest that the units do qualify for an exemption. Please review and correct the data

- as needed . If the units do not meet an exemption, please continue on to Table 2b. For now, the WDP does not include this rule for these units.
- OP-UA15 Table 2a has been updated to reflect the Combined 24-Hour VOC weight is 100-.

OP-MON – Units A18258, A1921, S18509, S18512

- These units require periodic monitoring for 30 TAC Chapter 111 Visible Emissions. An OP-MON for this rule was not included in this application (most likely because this application was submitted as a renewal). I have added the monitoring that was in previous permit to these units, but please confirm that this information is still correct. This monitoring was previously submitted as case-by-case, however we have an option PM-P-032 that is identical to that monitoring (that option is not currently in our guidance but will be added in the future) so I have incorporated the new option in the permit.
- You are correct that the permit application was originally submitted as a renewal for O1942 via USPS November 2023. The renewal application was subsequently submitted via STEERS May 2024.
- The CAM Summary and Periodic Monitoring Summary as you have incorporated them into the draft permit reflect the previous requirements in O1942 and are acceptable.



Susan Newman, CHMM | Environmental and Security Lead snewman@westlake.com | T. 281-727-3153 | C. 281-546-5942 Westlake Epoxy, a Westlake company 5900 Highway 225, Gate 7B, Deer Park, Texas 77536 | www.westlake.com

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
5/22/2024 9/11/2024	O1942 O4648	RN102590775

Unit ID No.	Registration No.	PBR No.	Registration Date
A20600	155623	106.261 (Facilities (Emission Limitations))	4/17/2019
BPA4FE	155623	106.261 (Facilities (Emission Limitations))	4/17/2019
A20600	155623	106.262 (Facilities (Emission and Distance Limitations))	4/17/2019
BPA4FE	155623	106.262 (Facilities (Emission and Distance Limitations))	4/17/2019
BPA4WW	53269	106.262 (Facilities (Emission and Distance Limitations))	12/6/2002
T1850	53269	106.472 (Organic and Inorganic Liquid Loading and Unloading)	12/6/2002
T18520	53269	106.472 (Organic and Inorganic Liquid Loading and Unloading)	12/6/2002
T20907	53269	106.472 (Organic and Inorganic Liquid Loading and Unloading)	12/6/2002
T20908	53269	106.472 (Organic and Inorganic Liquid Loading and Unloading)	12/6/2002
T20909	53269	106.472 (Organic and Inorganic Liquid Loading and Unloading)	12/6/2002
V18571	155623	106.476 (Pressurized Tanks or Tanks Vented to Control)	4/17/2019

Unit ID No.	Registration No.	PBR No.	Registration Date
V20903		106.472 (Organic and Inorganic Liquid Loading and Unloading)	12/6/2002

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
5/22/2024 9/11/2024	O1942 O4648	RN102590775

Unit ID No.	PBR No.	Version No./Date	
A20600	80 (Smokeless Gas Flare)	August 30, 1988	
Pressurized vessel vents to Unit ID BPA4	106 (Facilities, or physical or operational changes to a facility)	July 20, 1992	
BPA4FE	106 (Facilities, or physical or operational changes to a facility)	June 7, 1996	
BPA-SULF	106.472 (Organic and Inorganic Liquid Loading and Unloading)	September 4, 2000	
CAT-UNLOAD	106.261 (Facilities (Emission Limitations))	November 1, 2003	
CAT-UNLOAD	106.262 (Facilities (Emission and Distance Limitations))	November 1, 2003	
DIESLTK	106.412 (Fuel Dispensing)	September 4, 2000	
GASTK	106.412 (Fuel Dispensing)	September 4, 2000	
IPELOAD_UN	106.473 (Organic Liquid Loading and Unloading)	September 4, 2000	
LPELOAD_UN	106.472 (Organic and Inorganic Liquid Loading and Unloading)	September 4, 2000	
T20801	106.472 (Organic and Inorganic Liquid Loading and Unloading)	September 4, 2000	
T20802	51 (Liquid loading or unloading equipment including tanks, change of service of material)	May 4, 1994	

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	
5/22/2024 9/11/2024	O1942 O4648	RN102590775	

PBR No.	Version No./Date
PBR No.: 106.122 (Bench Scale Laboratory Equipment)	September 4, 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
5/22/2024 9/11/2024	O1942 O4648	RN102590775

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
A20600	106.261	Reg # 155623 Reg Date 4/17/2019	Monitor the presence of a flare pilot flame using a thermocouple or other equivalent device to detect the presence of a flame or using an alarm that uses a thermocouple or other equivalent device to detect the absence of a flame. Maintain records of alarm events and duration of alarm events. Each monitoring device shall be accurate to within manufacturer's recommendations. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or other written procedures that provide an adequate assurance that the device is calibrated accurately.
A20600	106.262	Reg # 155623 Reg Date 4/17/2019	Reference CAM above
BPA4FE	106.261	Reg # 155623 Reg Date 4/17/2019	Components are included in the SOP ID and SOP Index R5352ALL and 63HALL
BPA4FE	106.262	Reg # 155623 Reg Date 4/17/2019	Components are included in the SOP ID and SOP Index R5352ALL and 63HALL

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

Date:	11/30/2023 9/11/2024
Permit No.:	O1942 O4648
RN No.:	RN102590775

For SOP applications, answer ALL questions unless otherwise directed.

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

11					
Form OP-REQ1: Page 87	Form OP-REQ1: Page 87				
XII. NSR Authorizations (A	Attach a	dditional sheets if ne	cessary	for sections E-J)	
E. PSD Permits and	d PSD N	Iajor Pollutants			
PSD Permit No.:		Issuance Date:		Pollutant(s):	
PSD Permit No.:		Issuance Date:		Pollutant(s):	
PSD Permit No.:		Issuance Date:		Pollutant(s):	
PSD Permit No.:		Issuance Date:		Pollutant(s):	
If PSD Permits are held for th Technical Forms heading at:					
F. Nonattainment (NA) Pei	rmits and NA Major	Pollutar	nts	
NA Permit No.:		Issuance Date:		Pollutant(s):	
NA Permit No.:		Issuance Date:		Pollutant(s):	
NA Permit No.:		Issuance Date:		Pollutant(s):	
NA Permit No.:		Issuance Date:		Pollutant(s):	
If NA Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site experts.html.					
G. NSR Authorizat	ions wit	h FCAA § 112(g) Req	uireme	nts	
NSR Permit No.: 18738	Issuance	e Date: 01/21/2016	NSR Pe	ermit No.:	Issuance Date:
NSR Permit No.:	Issuance	e Date:	NSR Pe	ermit No.:	Issuance Date:
NSR Permit No.:	Issuance	e Date:	NSR Permit No.:		Issuance Date:
NSR Permit No.:	Issuance	e Date:	NSR Permit No.: Issuance Date:		
♦ H. Title 30 TAC Chapter 116 Permits, Special Permits, Standard Permits, Other Authorizations (Other Than Permits By Rule, PSD Permits, NA Permits) for the Application Area					
Authorization No.: 18738	Issuance Date: 01/21/2016		Authori	zation No.:	Issuance Date:
Authorization No.:	Authorization No.: Issuance Date:		Authori	zation No.:	Issuance Date:
Authorization No.:	Issuance	e Date:	Authori	zation No.:	Issuance Date:
Authorization No.:	Issuance Date:		Authori	zation No.:	Issuance Date:

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

Date:	11/30/2023 9/11/2024
Permit No.:	O1942 O4648
RN No.:	RN102590775

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 88						
XII. NSR Authorizations (Attach a	XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)					
♦ I. Permits by Rule (30 TA	C Chapter 106) for the Application Area					
A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.						
PBR No.: 106.122	Version No./Date: September 4, 2000					
PBR No.: 106.261	Version No./Date: November 1, 2003					
PBR No.: 106.262	Version No./Date: November 1, 2003					
PBR No.: 106.412	Version No./Date: September 4, 2000					
PBR No.: 106.472	Version No./Date: September 4, 2000					
PBR No.: 106.473	Version No./Date: September 4, 2000					
PBR No.: 106.476	Version No./Date: September 4, 2000					
PBR No.: 51	Version No./Date: May 4, 1994					
PBR No.: 80	Version No./Date: February 26, 1992 August 30, 1988					
PBR No.: 106	Version No./Date: January 31, 1994 July 20, 1992					
PBR No.: 106	Version No./Date: September 12, 1996 June 7, 1996					
PBR No.: 106	Version No./Date: October 8, 1996					
PBR No.: 118	Version No./Date: February 26, 1992					
PBR No.:	Version No./Date:					
PBR No.:	Version No./Date:					
PBR No.:	Version No./Date:					
♦ J. Municipal Solid Waste a	and Industrial Hazardous Waste Permits With an Air Addendum					
Permit No.:	Issuance Date:					
Permit No.:	Issuance Date:					
Permit No.:	Issuance Date:					
Permit No.:	Issuance Date:					

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

Date	Permit No.	Regulated Entity No.
9/11/2024	01942- 04648	RN102590775

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
		AE40600	OP-UA15 OP-REQ2 OP-REQ3	40 CFR Part 63, Subpart F 40 CFR Part 63, Subpart G	40 CFR 63.107 40 CFR 63.110(a)	Vent is not a process vent subject to MACT F by definition under this subpart, because the gas stream does not have the characteristics specified in paragraphs (b) through (h) of this section, or meets the criteria specified in paragraph (i) of this section.
		AE40601	OP-UA15 OP-REQ2 OP-REQ3	40 CFR Part 63, Subpart F 40 CFR Part 63, Subpart G	40 CFR 63.107 40 CFR 63.110(a)	Vent is not a process vent subject to MACT F by definition under this subpart, because the gas stream does not have the characteristics specified in paragraphs (b) through (h) of this section, or meets the criteria specified in paragraph (i) of this section.
		OP REQ2 BPA-SULF	4 0 CFR Part 63, Subpart F OP-REQ2	40 CFR 63.100(b)(2) 40 CFR Part 63, Subpart F 40 CFR Part 63, Subpart G	Does not store HAPs. 40 CFR 63.100(b)(2) 40 CFR 63.110(a)	Does not store VOCs.
	NEW	BPA4FE	OP-UA12 OP-REQ2 OP-REQ3	40 CFR Part 60, Subpart VV	40 CFR 63.160(b)(1)	Equipment subject to MACT H is no longer required to comply with 60 Subpart VV.
		CAT-UNLOAD	OP-UA4 OP-REQ2 OP-REQ3	40 CFR Part 63, Subpart F 40 CFR Part 63, Subpart G	40 CFR 63.101(b) 40 CFR 63.110(a)	Unit is not a transfer rack by definition under MACT F because the unit is unloading only and does not transfer organic HAPs listed in Table 2 of this subpart.

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)

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
		DIESLTK	OP-REQ2	40 CFR Part 63, Subpart F 40 CFR Part 63, Subpart G	40 CFR 63.101(b) 40 CFR 63.110(a)	Tank is not a storage vessel by definition under MACT F because the capacity of the tank is less than 38 cubic meters (10,000 gallons).
		GASTK	OP-REQ2	40 CFR Part 63, Subpart F 40 CFR Part 63, Subpart G	40 CFR 63.101(b) 40 CFR 63.110(a)	Tank is not a storage vessel by definition under MACT F because the capacity of the tank is less than 38 cubic meters (10,000 gallons).
		MSHLOAD_UN	OP-UA4 OP-REQ2 OP-REQ3	40 CFR Part 63, Subpart F 40 CFR Part 63, Subpart G	40 CFR 63.101(b) 40 CFR 63.110(a)	Unit is not a transfer rack by definition under MACT F because the unit does not transfer organic HAPs listed in Table 2 of this subpart.
		T147	OP-UA3	40 CFR Part 63, Subpart F 40 CFR Part 63, Subpart G	40 CFR 63.101(b) 40 CFR 63.110(a)	Tank is not a storage vessel by definition under MACT F because the capacity of the tank is less than 38 cubic meters (10,000 gallons).
		T1850	OP-REQ2	40 CFR Part 63, Subpart F 40 CFR Part 63, Subpart G	40 CFR 63.100(b)(2) 40 CFR 63.110(a)	Does not store HAPs.
		T18507	OP-REQ2	40 CFR Part 63, Subpart F 40 CFR Part 63, Subpart G	40 CFR 63.100(b)(2) 40 CFR 63.110(a)	Does not store HAPs.
		T1851B	OP-REQ2	40 CFR Part 63, Subpart F 40 CFR Part 63, Subpart G	40 CFR 63.100(b)(2) 40 CFR 63.110(a)	Does not store HAPs.
		T18520	OP-REQ2	40 CFR Part 63, Subpart F 40 CFR Part 63, Subpart G	40 CFR 63.100(b)(2) 40 CFR 63.110(a)	Does not store HAPs.
		T1857	OP-UA3 OP-REQ2	40 CFR Part 63, Subpart F 40 CFR Part 63, Subpart G	40 CFR 63.101(b) 40 CFR 63.110(a)	Tank is not a storage vessel by definition under MACT F because the capacity of the tank is less than 38 cubic meters (10,000 gallons).
		T20907	OP-REQ2	40 CFR Part 63, Subpart F 40 CFR Part 63, Subpart G	40 CFR 63.100(b)(2) 40 CFR 63.110(a)	Does not store HAPs.
		T20908	OP-REQ2	40 CFR Part 63, Subpart F 40 CFR Part 63, Subpart G	40 CFR 63.100(b)(2) 40 CFR 63.110(a)	Does not store HAPs.

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
		T20909	OP-REQ2	40 CFR Part 63, Subpart F 40 CFR Part 63, Subpart G	40 CFR 63.100(b)(2) 40 CFR 63.110(a)	Tank is not a storage vessel by definition under MACT F because the capacity of the tank is less than 38 cubic meters (10,000 gallons).
		T2413B	OP-UA3	40 CFR Part 63, Subpart F 40 CFR Part 63, Subpart G	40 CFR 63.101(b) 40 CFR 63.110(a)	Tank is not a storage vessel by definition under MACT F because the capacity of the tank is less than 38 cubic meters (10,000 gallons).
		T6005	OP-REQ2	40 CFR Part 63, Subpart F 40 CFR Part 63, Subpart G	4 0 CFR 63.100(b)(2) 40 CFR 63.110(a)	Does not store HAPs.
		T19554 T9554	OP-UA3 OP-REQ2 OP-REQ3	40 CFR Part 60, Subpart K	40 CFR 60.110(a)	Tank does not store petroleum liquid.
		V20903	OP-REQ2	40 CFR Part 63, Subpart F 40 CFR Part 63, Subpart G	40 CFR 63.100(b)(2) 40 CFR 63.110(a)	Does not store HAPs.

Fugitive Emission Unit Attributes Form OP-UA12 (Page 32)

Federal Operating Permit Program

Table 4a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

Subpart VV: Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006

Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
11/30/2023 9/11/2024	01942 04648	RN102590775

Unit ID No.	SOP Index No.	Produces Chemicals	Affected Facility	Construction/ Modification Date	Compliance Option	Design Capacity	Produces Heavy Liquid Chemicals	Beverage Alcohol Production
BPA4FE	60VVALL							

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.
11/30/2023 9/11/2024	01942	RN102590775

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
BPA4	R5121-1	NO	NO	REGVAPPL		100+	612+	NO
AE40600	R5121-2	NO	NO	REGVAPPL		100+ 100-	612+	YES
AE40601	R5121-2	NO	NO	REGVAPPL		100+ 100-	612+	YES

From: Kyle Murray <Kyle.Murray@tceq.texas.gov>

Sent: Thursday, August 8, 2024 5:09 PM

To: Newman, Susan <snewman@westlake.com>

Subject: [EXT] Working Draft Permit -- FOP O4648/Project 36670, Westlake Epoxy INC, Westlake Deer

Park

Good afternoon Ms. Newman,

I have conducted a technical review of the initial application for Westlake Epoxy INC, Westlake Deer Park. 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 **Monday, September 9, 2024**. Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

In addition, upon evaluation of your federal operating permit application, we have determined that there are a few discrepancies that need to be addressed to finalize the permit. Please provide a response to the following items with your response to the WDP.

Form OP-PBRSUP

- The OP-PBRSUP form submitted with your application incorrectly lists all PBRs on Table C, which is designated for all PBR authorizations that are not required to be identified in tables A, B, or D. Referencing the PBR table in the form instructions, PBR 106.122/09/04/2000 is the only one that should be listed on Table C. The remaining PBRs should be listed in Tables A (if registered) and B (claimed, not registered), and subsequently in Table D
 - (monitoring for units in Tables A & B). Please update the OP-PBRSUP tables and redate the form upon completion.
- In addition, the version no./date that we request on our forms for the following PBRs is supposed to be the effective date of the PBR with which the unit is complying. It is not the date that the PBR was claimed. Therefore, the forms should reflect the corresponding effective dates listed on the

"Outdated Standard Exemption Index" on the TCEQ website. **Please** correct the dates listed below on both the OP-PBRSUP and the OP-REQ1.

- PBR 80/02/26/1992
- PBR 106/01/31/1994
- PBR 106/09/12/1996
- PBR 106/10/08/1996
- PBR 118/02/26/1992

• Form OP-REQ1 – NSR Permit No. 18738

Section XII.G of the OP-REQ1 is for NSR authorizations with FCAA § 112(g) requirements. That means the permit contains case-by-case MACT requirements because no Part 63 subpart was promulgated by EPA for the appropriate source category. If NSR permit No. 18738 does not contain such requirements, it should instead be listed in Section XII.H of the OP-REQ1. Please confirm the correct section for the NSR permit and provide an updated page of the form if needed.

• **Unit ID No. T19954** – This ID number on the OP-REQ2 is listed as "T9954", as well as on other sections of the application. Please confirm which ID you'd like to use and update the applicable forms with the correct ID number.

• /«®© #\$ &1 %

- On page 2, there is a row with "OP-REQ2" listed as an ID number. It looks like data got shifted over into the wrong columns. I have entered this permit shield as a part of "BPA-SULF". Please verify the correct unit ID and add it to this row on the form.
- All rows that list the regulation name as 40 CFR Part 63, Subpart F should list 40 CFR Part 63, Subpart G instead. While information from the MACT F definitions is used to support the permit shields and that rule establishes the general applicability of the MACT F-I, the potentially applicable requirements for transfer racks, storage tanks, or process vents are located in MACT G. Therefore, since that is the rule that would have been in the permit if the units were not exempt, that is the rule that is listed for the shield. In addition, the negative applicability citation should really be 63.110(a) since that is the citation that lists the units to which the rule applies (the shields are saying the units in the permit are not the listed unit types). I have adjusted the reason wording to include the definition citation so that connection will remain clear. Please correct these rows on the form.
- For the NSPS NNN shield for BPA4, the citation listed was 63.110(d) (4) but language in the reason was more similar to 63.110(d)(10). The reason was updated to be consistent with 63.110(d)(4). Please confirm this is correct.
- For the NSPS RRR shield for BPA4 the citation listed was 63.110(d)(7) but language in the reason was more similar to 63.110(d)(10). The reason was updated to be consistent with 63.110(d)(7). Please confirm this is correct.
- Updates have been made to the wording of various permit shields just to clarify or more closely follow rule language. If you have any issues or questions as you review the WDP, please let me know.

CAM Deviation Limits

- o In reference to the selected CAM option numbers for the following unit ID numbers, please provide us with the most appropriate of the following: the most recent performance test data, the manufacturer's recommendations, engineering calculations, and/or historical data that would justify the proposed deviation limit in your application.
 - A18258 "Pressure drop shall be at least 0.5-inch water gauge pressure and shall not exceed 10 inches water gauge pressure."
 - S18509 "Pressure drop shall be at least 0.5-inch water gauge pressure and shall not exceed 10 inches water gauge pressure."
 - S18512 "Pressure drop shall be at least 0.5-inch water gauge pressure and shall not exceed 10 inches water gauge pressure."

• Forms OP-UA15 and OP-MON - SOP Index Numbers

- We prefer that index numbers reflect the regulation applicable to the units. In your application the index number "R1111" is used to reflect both 30 TAC Chapter 111, Nonagricultural Processes (main standard 111.151(a)) and 30 TAC Chapter 111, Visible Emissions (main standard 111.111(a)(1)(B)). We have made the following changes to help differentiate the index numbers for main standard 111.151(a). These are for units A18258, S18509, and S18512. Kindly let me know if this is acceptable.
 - R1111-1 updated to "R1151-1"
 - R1111-2 updated to "R1151-2"
 - R1111-3 updated to "R1151-3"

Form OP-UA15 - Units AE40600 and AE40601

On Table 2a for Chapter 115, Vent Gas Controls, there is an error with the unit attributes. Based on the "100+" answer for Combined 24 Hour VOC Weight and the "612+" answer for VOC Concentration, these units are not meeting an exemption. However, VOC Concentration or Emission Rate at Maximum Operating Conditions was answered "Yes". That would suggest that the units do qualify for an exemption. Please review and correct the data as needed. If the units do not meet an exemption, please continue on to Table 2b. For now, the WDP does not include this rule for these units.

• OP-MON – Units A18258, A1921, S18509, S18512

These units require periodic monitoring for 30 TAC Chapter 111 Visible Emissions. An OP-MON for this rule was not included in this application (most likely because this application was submitted as a renewal). I have added the monitoring that was in previous permit to these units, but please confirm that this information is still correct. This monitoring was previously submitted as case-by-case, however we have an option PM-P-032 that is identical to that monitoring (that option is not currently in our guidance but will be added in the future) so I have incorporated the new option in the permit.

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

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

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require

the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1.

Please notify me when these updates have been submitted.

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

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

Thank you for your cooperation.

Sincerely,

Kyle J. Murray

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

Phone: (512) 239-1279 Fax: (512) 239-1400



How are we doing? Fill out our online customer satisfaction survey

at www.tceq.texas.gov/customersurvey

From: Newman, Susan < snewman@westlake.com>

Sent: Friday, June 28, 2024 4:26 PM

To: Kyle Murray < Kyle. Murray@tceq.texas.gov>

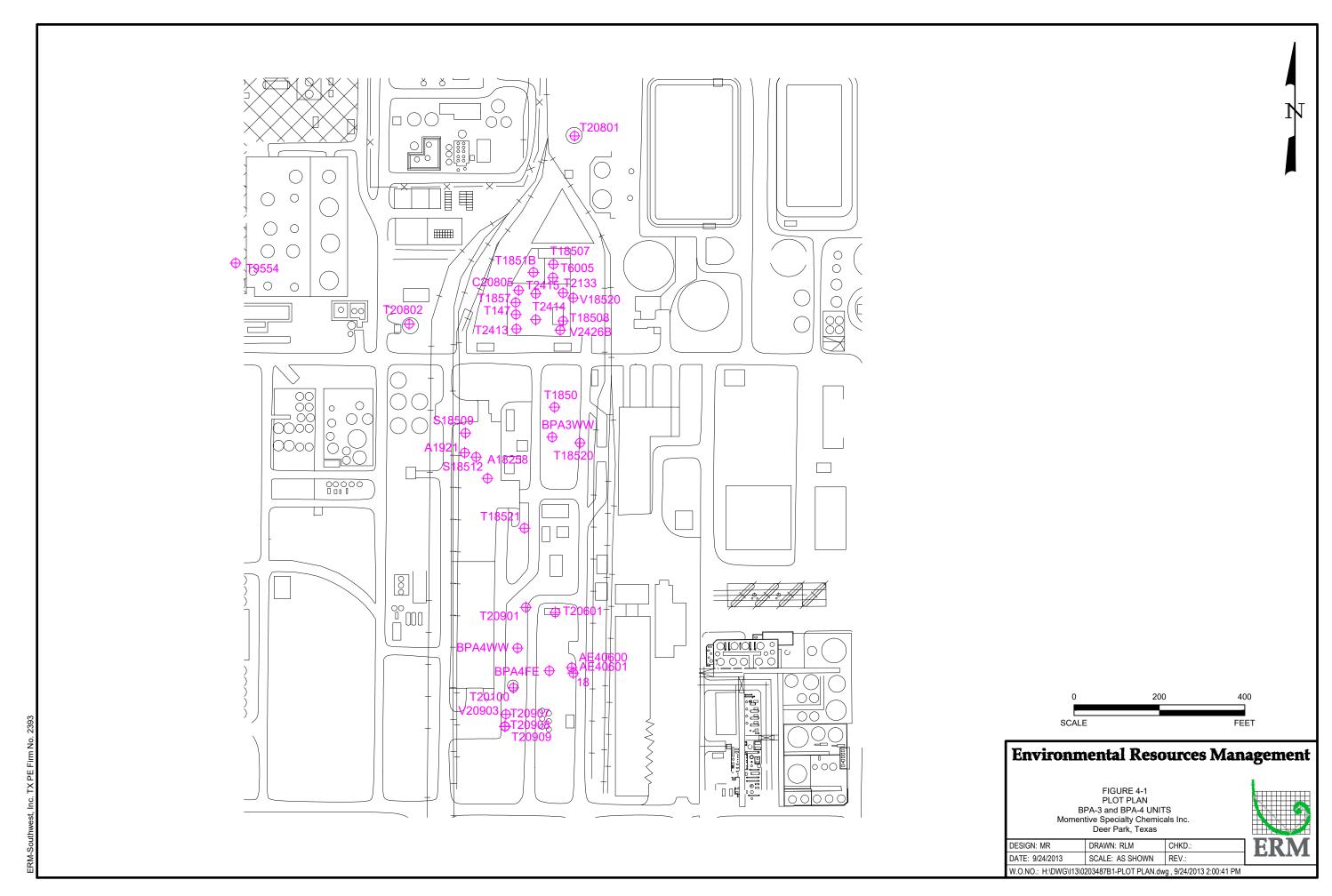
Subject: RE: Technical Review -- FOP O4648/Project 36670, Westlake Epoxy INC / Westlake Deer Park

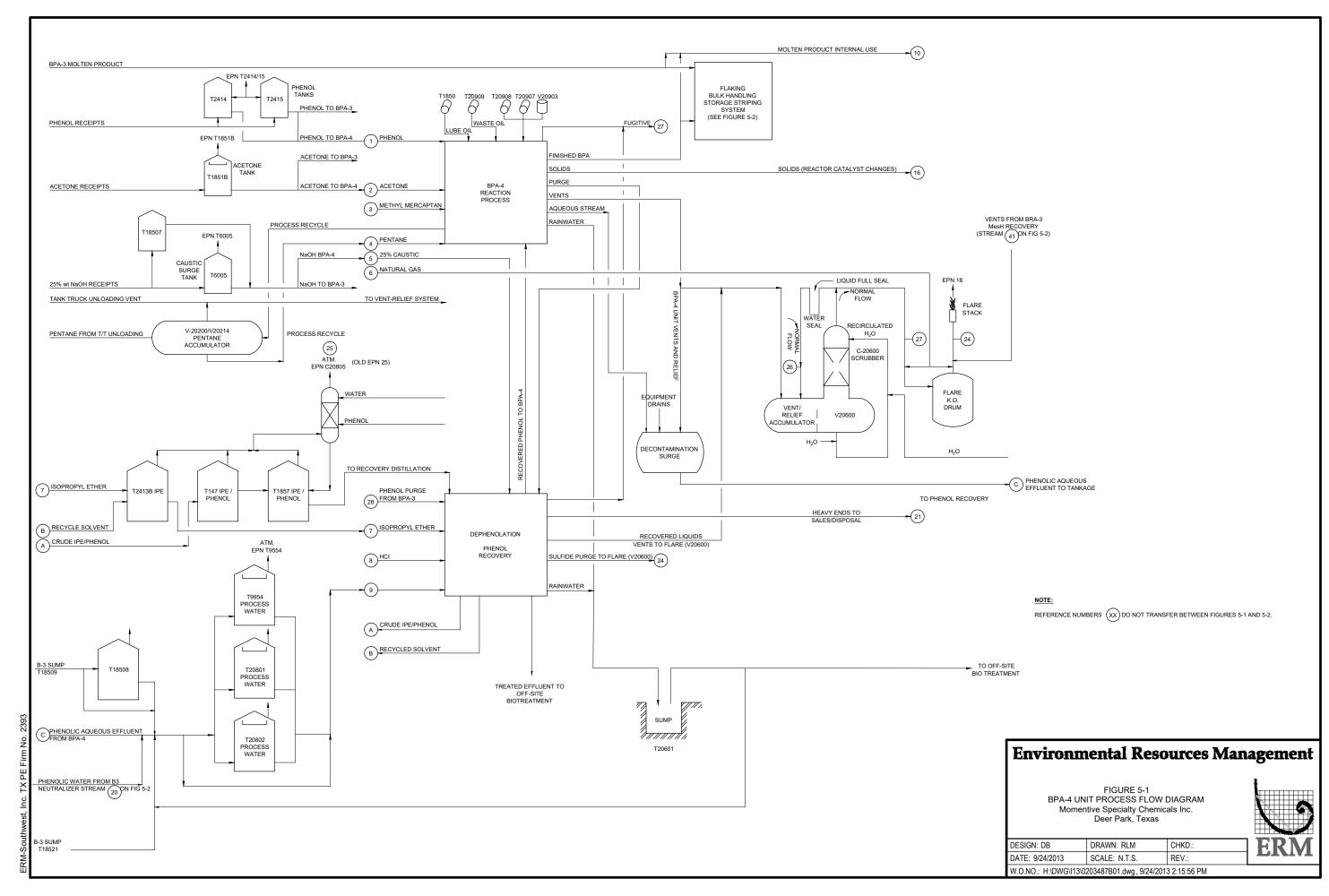
Thank you for getting in touch.

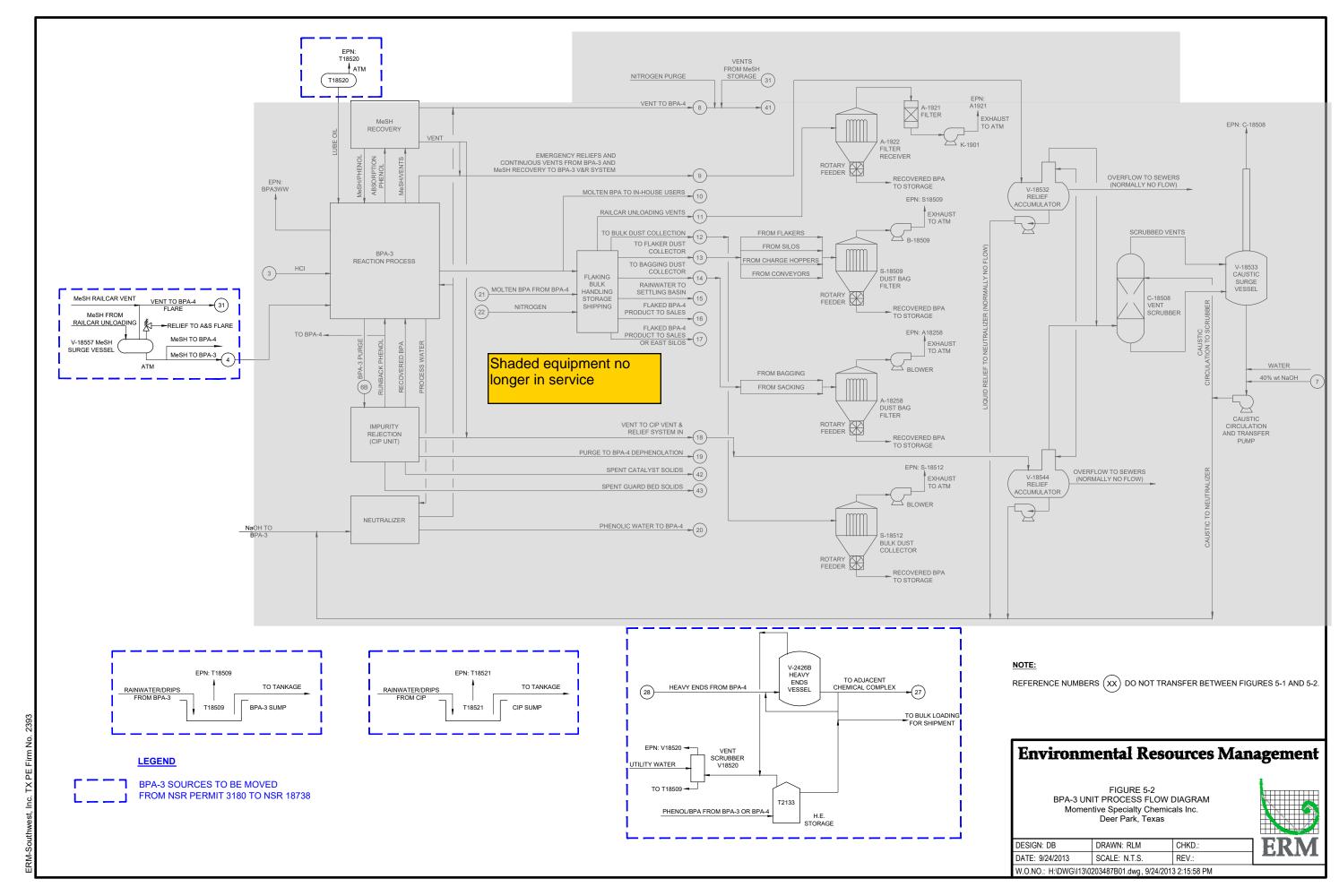
Per your request, a plot plan and process flow diagram are attached to this email.

Please let me know if you have any additional questions.









From: Kyle Murray < Kyle. Murray@tceq.texas.gov>

Sent: Monday, June 24, 2024 9:51 AM

To: Newman, Susan <snewman@westlake.com>

Subject: [EXT] Technical Review -- FOP O4648/Project 36670, Westlake Epoxy INC / Westlake Deer Park

Good morning Ms. Newman,

I have been assigned to the Federal Operating Permit (FOP) initial issuance application of Permit No. O4648 for Westlake Epoxy INC, Westlake Deer Park. This application has been assigned Project No. 36670. 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.
- 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 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.

As required with an initial issuance application, there are a few additional documents that are necessary to complete our review. We would like to request the following documents that were not included in the initial application.

- Plot Plan
- Process Flow Diagram

Please provide these additional documents by Monday, July 01, 2024.

Please review the "SOP Technical Review Fact Sheet" located at http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf. This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

Kyle J. Murray

Permit Reviewer
OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality MC 163, P.O. Box 13087 Austin, TX 78711-3087 kyle.murray@tceq.texas.gov

Phone: (512) 239-1279 Fax: (512) 239-1400



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

Texas Commission on Environmental Quality

Title V New

Yes

WESTLAKE EPOXY DEER PARK - BPA

Site Information (Regulated Entity)

What is the name of the permit area to be

authorized?

Does the site have a physical address?

Physical Address

Number and Street 5900 HIGHWAY 225 Gate 7B

City DEER PARK

 State
 TX

 ZIP
 77536

 County
 HARRIS

 Latitude (N) (##.#####)
 29.711666

 Longitude (W) (-###.######)
 -95.118055

Primary SIC Code Secondary SIC Code

Primary NAICS Code 325211

Secondary NAICS Code

Regulated Entity Site Information

What is the Regulated Entity's Number (RN)? RN102590775

What is the name of the Regulated Entity (RE)? WESTLAKE EPOXY DEER PARK

Does the RE site have a physical address?

Yes

Physical Address

Number and Street 5900 HIGHWAY 225

City DEER PARK

 State
 TX

 ZIP
 77536

 County
 HARRIS

 Latitude (N) (##.#####)
 29.711666

 Longitude (W) (-###.#####)
 -95.118055

 Facility NAICS Code
 325211

What is the primary business of this entity?

Manaufactures Liquid and Solid Resin Products

Customer (Applicant) Information

How is this applicant associated with this site?

Owner Operator
What is the applicant's Customer Number

CN605982537

(CN)?

Type of Customer Corporation

Full legal name of the applicant:

Legal Name Westlake Epoxy Inc.

Texas SOS Filing Number 804417119

Federal Tax ID

State Franchise Tax ID 32082923908

State Sales Tax ID Local Tax ID **DUNS Number**

Number of Employees

Independently Owned and Operated?

No

2817273151

Responsible Official Contact

Person TCEQ should contact for questions

about this application:

Organization Name Westlake Epoxy Inc

Prefix MR

First Prashanth

Middle

Last Hejmadi

Suffix Credentials

Title Plant Manager

Enter new address or copy one from list:

Mailing Address

Address Type Domestic

Mailing Address (include Suite or Bldg. here, if PO BOX 1311

applicable)

Routing (such as Mail Code, Dept., or Attn:)

City DEER PARK

 State
 TX

 ZIP
 77536

Phone (###-###-###)

Extension

Alternate Phone (###-###-###)

Fax (###-###-###)

E-mail phejmadi@westlake.com

Duly Authorized Representative Contact

Person TCEQ should contact for questions

about this application

Same as another contact? Responsible Official Contact

Organization Name Westlake Epoxy Inc

Prefix MR
First Prashanth

Middle

Last Hejmadi

Suffix

Credentials

Title Plant Manager

Enter new address or copy one from list

Mailing Address

Address Type Domestic

Mailing Address (include Suite or Bldg. here, if PO BOX 1311

applicable)

Routing (such as Mail Code, Dept., or Attn:)

City DEER PARK

TX State 77536 Zip

Phone (###-###-###) 2817273151

Extension

Alternate Phone (###-###-####)

Fax (###-###-###)

E-mail phejmadi@westlake.com

Technical Contact

Person TCEQ should contact for questions

about this application:

Same as another contact? Responsible Official Contact

Organization Name Westlake Epoxy Inc

MS Prefix First Susan

Middle

Last Newman

Suffix Credentials

Title **Environmental Specialist**

Enter new address or copy one from list:

Mailing Address

Address Type Domestic PO BOX 1311 Mailing Address (include Suite or Bldg. here, if

applicable)

Routing (such as Mail Code, Dept., or Attn:)

City **DEER PARK**

State TX 77536 ZIP

Phone (###-###-###) 2817273153

Extension

Alternate Phone (###-###-###)

Fax (###-###-###)

E-mail snewman@westlake.com

Title V General Information - New

1) Permit Latitude Coordinate: 29 Deg 42 Min 42 Sec

2) Permit Longitude Coordinate: 95 Deg 7 Min 5 Sec

3) Is this submittal a new application or an **New Application** update to an existing application?

SOP 3.1. What type of Federal Operating Permit are

you applying for?

3.2. Is this submittal an abbreviated or a full Full application?

3.3. Is this application for a portable facility? No

3.4. Is the site a non-major source subject to No the Federal Operating Permit Program?

3.5. Are there any permits that should be No

voided upon issuance of this permit application through permit conversion?

3.6. Are there any permits that should be voided upon issuance of this permit application through permit consolidation?

4) Who will electronically sign this Title V application?

5) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?

Responsible Official

No

No

Title V Attachments New

Attach OP-1 (Site Information Summary)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?

fileId=198140>OP_1_01 OP-1 Site Information

Summary 10002.docx

Hash 014D958A4728AF86F640D48C4045E30DE1B619974A985E8C57A6472D1417B338

MIME-Type application/vnd.openxmlformats-

officedocument.wordprocessingml.document

Attach OP-ACPS (Application Compliance Plan and Schedule)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?

fileId=198141>OP_ACPS_24 OP-ACPS Application Compliance Plan and Schedule

10100 - Form Only.pdf

Hash 8137C9C91AFB5650D125A670DB243840BC2A626355EE3E9B54F285D4032B438E

MIME-Type application/pdf

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

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?

fileId=198143>OP REQ1 21 OP-REQ1 Area

Wide Applicability 10043.docx

Hash A362B764FAE81ED067AE1B797A42FC6F19585F41CE6F1DF6DB2614E7C32F45E9

MIME-Type application/vnd.openxmlformats-

officedocument.wordprocessingml.document

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?

fileId=198144>OP_REQ2_22 OP-REQ2 Negative Applicability 10017 11102023

MK.docx

Hash FC5172E35D8B1CF9521A675758A242E5587E4DFC029201E6DFA0D687E69B4097

MIME-Type application/vnd.openxmlformats-

officedocument.wordprocessingml.document

Attach OP-REQ3 (Applicable Requirements Summary)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?

fileId=198145>OP_REQ3_23 OP-REQ3 Applicable Requirement Summary Add

Remove 10018 tbl.docx

Hash 1F48C09104A638CA9001680585638AFF461122D4C9DEDB3D5D8B05B1AA6EC860

MIME-Type application/vnd.openxmlformats-

officedocument.wordprocessingml.document

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?

fileId=198227>OP-PBRSUP 20875.docx

Hash 175622C6EEAAC2B1A9B84F2617EF1E6587295EF91B727621BB46DB44721BBEF7

MIME-Type application/vnd.openxmlformats-

officedocument.wordprocessingml.document

Attach OP-SUM (Individual Unit Summary)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?

fileId=198205>OP_SUM_04 OP-SUMR Individual Unit Summary for Revisions

10344.docx

Hash 6F95FBB2FD528DAC71F5ECDED0D1A53612774E4CEB8CA593EBE6C770D9E94E55

MIME-Type application/vnd.openxmlformats-

officedocument.wordprocessingml.document

Attach OP-MON (Monitoring Requirements)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?

fileId=198206>OP_MON_HX-2786-H R1111-1 Form OP-MON (Page 1) 11102023 MK.pdf

Hash 8586A68C5A82D629FFC1A06A9556D7C6F01805298988ACEF8570C668D3ABFF94

MIME-Type application/pdf

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?

fileId=198207>OP_MON_HX-2786-H R1111-2 & R5121-1 Form OP-MON (Page 1) 11102023

MK.pdf

Hash CE865E653CD90D3134D0C68C81884E55D9A7480DAE172F0401103E2B9699EA03

MIME-Type application/pdf

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?

fileId=198208>OP_MON_HX-2786-H R1111-3 Form OP-MON (Page 1) 11102023 MK.pdf

Hash 60BA62C5570E97E149784B6E8F15404FAA84555FD259F20FFB62F083CC9D7B04

MIME-Type application/pdf

Attach OP-UA (Unit Attribute) Forms

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?

fileId=198209>05 06 OP-UA3 Storage 10008tbl

11102023 MK.docx

Hash C111D122221B3D2310DDA86DFC4F81744593A18170B20F19DC01138A65A17F04

MIME-Type application/vnd.openxmlformats-

officedocument.wordprocessingml.document

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?

fileId=198210>07 08 OP-UA4 Load Unload

10041 11102023 MK.docx

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MIME-Type application/vnd.openxmlformats-

officedocument.wordprocessingml.document

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?

fileId=198211>09 10 11 OP-UA7 10022

11102023 MK.docx

Hash 39A281AE9BF90B308172A205371A1EECE0F2CC09EEA58A4B040C2F95CE9F801B

MIME-Type application/vnd.openxmlformats-

officedocument.wordprocessingml.document

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?

fileId=198212>12 13 14 OP-UA12 Fugitive Emissions 10045tbl 11102023 MK.docx

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MIME-Type application/vnd.openxmlformats-

officedocument.wordprocessingml.document

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?

fileId=198213>15 16 17 18 OP-UA15 10046

11102023 MK.docx

Hash 64408ECAF9DA70E58446F26EA065A22251B3A2A9F408B92EA0CF4CDF3A5A891A

MIME-Type application/vnd.openxmlformats-

officedocument.wordprocessingml.document

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?

fileId=198214>19 OP-UA19 Wastewater

10034.docx

Hash 2AB5F8DEDDA7741F4744685F3A03D6CF3A5161494D975F334E25EE1FBB7B388D

MIME-Type application/vnd.openxmlformats-

officedocument.wordprocessingml.document

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?

fileId=198215>20 OP-UA60 SOCMI

10296.docx

Hash 82953B3C66FBAE9D640492C787E64AEB26DCEB31E03A6F9B0D8021705633F38E

MIME-Type application/vnd.openxmlformats-

officedocument.wordprocessingml.document

Attach OP-CRO2 (Change of Responsible Official Information)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?

fileId=198218>OP CRO2 240424 OP-CRO2

and Core Data Form.pdf

Hash B8194ED2956F3A852DC1EF9C84AE983F82562B3BE346E7503670F55C3D56AD3C

MIME-Type application/pdf

Attach OP-DEL (Delegation of Responsible Official)

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?

fileId=198221>231130 Site Map.pdf

Hash 121B7C307833E1575C366D12D1B4E3EEA7E389EC9AB7819DC356D6398F8A2D3A

MIME-Type application/pdf

[File Properties]

File Name

231130 Submittal FOP O1942 Renewal Application 11-30-2023.pdf

Hash

7F56CACAA3D60BE41E87FE66410893F5EA08207323674CA19B2B8D489F56E8B4

MIME-Type application/pdf

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

Expedite Title V

1) Per Texas Health and Safety Code, Section 382.05155, does the applicant want to expedite the processing of this application?

Nο

Certification

I certify that I am the Responsible Official for this application and that, based on information and belief formed after reasonable inquiry, the statements and information on this form are true, accurate, and complete.

- 1. I am Prashanth Hejmadi, the owner of the STEERS account ER105575.
- 2. I have the authority to sign this data on behalf of the applicant named above.
- 3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
- 4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
- 5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
- 6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcemen of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
- 7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
- 8. I am knowingly and intentionally signing Title V New.
- 9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEQ

OWNER OPERATOR Signature: Prashanth Hejmadi OWNER OPERATOR

Account Number: ER105575
Signature IP Address: 209.162.23.229
Signature Date: 2024-05-22

 Signature Hash:
 CCFA8ABC99CBAF421191EBFF4FB5866156D77A847D4E6A4A5E377E48B0112A09

 Form Hash Code at time of Signature:
 242A643F283734F8D811A605F42B07D53629611D9FB1D141D7BF0DBA8AE38475

Submission

Reference Number: The application reference number is 655690

Submitted by:

The application was submitted by

ER105575/Prashanth Hejmadi

Submitted Timestamp: The application was submitted on 2024-05-22

at 12:04:49 CDT

Submitted From: The application was submitted from IP address

209.162.23.229

Confirmation Number: The confirmation number is 541676

Additional Information

Application Creator: This account was created by Susan G Newman



November 30, 2023

<u>CERTIFIED MAIL – RETURN RECEIPT REQUESTED</u> (7021 2720 0001 3600 2940)

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

RE:

Title V Federal Operating Permit O1942 Renewal Application

Westlake Epoxy Inc., Deer Park Plant - BPA

TCEQ RN102590775, CN605982537

Westlake Epoxy Inc. ("Westlake") operates a bisphenol acetone and resins manufacturing plant in Deer Park, Harris County, Texas (Deer Park Plant). Westlake's Deer Park Plant includes two operating areas, and each area is operating under a unique Federal Operating Permit (FOP) number: the Bisphenol A (BPA) Unit is authorized under FOP No. O1942; and the Resins Units are authorized under FOP No. O1940. Westlake hereby submits this timely renewal application for Federal Operating Permit (FOP) O1942 pursuant to 30 TAC §122.133.

Should you need any additional information, please do not hesitate to contact me at 281.727.3153, or snewman@westlake.com. We greatly appreciate your time and consideration regarding this matter.

Susan G. Newman

Specialist Principal-Environmental

+1 281 727 3153

snewman@westlake.com

Attachments

cc: <u>CERTIFIED MAIL – RETURN RECEIPT REQUESTED</u>

(7021 2720 0001 3600 2957)
Texas Commission on Environmental Quality - Region 12
Regional Director
5425 Polk Ave., Ste. H
Houston TX 77023-1452

Environmental Protection Agency, Region 6 via email to R6AirPermits@epa.gov



Renewal Application for Federal Operating Permit No. O1942

Deer Park Plant – BPA Deer Park, Texas

November 2023

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1 INTRODUCTION

Westlake Epoxy Inc. (Westlake) operates a bisphenol acetone and resins manufacturing plant in Deer Park, Harris County, Texas (Deer Park Plant). Westlake has been assigned Texas Commission on Environmental Quality (TCEQ) Customer Reference Number (CN) 605982537. The Deer Park Plant is registered under the TCEQ Regulated Entity Reference Number (RN) 102590775. The Deer Park Plant includes two operating areas, and each area is operating under a unique Federal Operating Permit (FOP) number:

- Bisphenol A (BPA) Unit is authorized under FOP No. O1942; and
- Resins Units are authorized under FOP No. O1940.

Westlake is submitting this application for the renewal of the BPA Unit FOP No. O1942.

1.1 PURPOSE

As per 30 TAC §122.241(b), Westlake is submitting this timely and complete application under 30 TAC §122.133 and 30 TAC §122.134. The application is being submitted within the six to eighteen month time frame specified by 30 TAC §122.133. The application is being submitted with all updated information not previously submitted as specified by 30 TAC §122.134.

1.2 BACKGROUND

The BPA Unit FOP No. O1942 was initially issued on April 15, 2003. The most recent renewal was issued on June 26, 2019, an ownership update February 2022 and a name change update April 2022. Since the issuance of the June 2019 renewal, no Off-Permit/Operational Flexibility notifications have been submitted to the TCEQ related to O1942.

1.3 APPLICATION OVERVIEW

In the FOP No. O1942 renewal application, Westlake is proposing the changes listed in Table 1-1.

Table 1-1 FOP No. O1942 Renewal Application Proposed Changes

Unit ID	Unit Description	Proposed Changes
V2426B	BPA Heavy Ends Storage Tank	OP-UA3. Updated True Vapor Pressure.

This document constitutes a complete FOP renewal application in accordance with 30 TAC Chapter 122. Key components of a complete application are included in this document as follows:

- General and Administrative information is included in Section 2;
- Emission unit/process information is addressed in Section 3;
- Potentially applicable requirement information is provided in Section 4;
- Information regarding additional monitoring requirements (Periodic Monitoring and Compliance Assurance Monitoring) is included in Section 5;
- Compliance status information is addressed in Section 6; and
- Supplemental information, including an area map and process description are included in Section 7.

2 GENERAL AND ADMINISTRATIVE FORMS

This section includes all information related to the administrative details of the renewal application.

2.1 SITE INFORMATION SUMMARY (FORM OP-1)

Form OP-1 provides company and site identifying information, contact information, and public notice information to support the FOP review and processing.

2.2 APPLICATION FOR PERMIT REVISION/RENEWAL (FORM OP-2)

Form OP-2 summarizes the changes from the current FOP. This renewal application is updating preconstruction authorizations since the last permit action, site-wide terms and conditions, and negative applicability determinations.

2.3 RESPONSIBLE OFFICIAL CERTIFICATION (FORM OP-CRO1)

Form OP-CRO1, Certification by Responsible Official, allows the Responsible Official or his/her appropriate designee to certify all documents submitted to the TCEQ in support of a FOP pursuant to 30 TAC § 122.165.

Federal Operating Permit Program Site Information Summary Form OP-1 (Page 1)

Texas Commission on Environmental Quality

Please print or type all information. Direct any questions regarding this application form to the Air Permits Division at (512) 239-1250 or to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division (MC 163), P.O. Box 13087, Austin, Texas 78711-3087.

I.	Company Identifying Information					
A.	Company Name: Westlake Epoxy Inc.					
В.	Customer Reference Number (CN): CN605982537					
C.	Submittal Date (mm/dd/yyyy):November 30, 2023					
II.	Site Information					
Α.	Site Name: Westlake Deer Park					
В.	Regulated Entity Reference Number (RN): RN102590775					
C.	Indicate affected state(s) required to review permit application: (Check the appropriate box[es].)					
	R CO KS LA NM OK N/A					
D.	D. Indicate all pollutants for which the site is a major source based on the site's potential to emit: (Check the appropriate box[es].)					
$\boxtimes V$	$OC \qquad \square \ NO_X \qquad \boxtimes SO_2 \qquad \square \ PM_{10} \qquad \square \ CO \qquad \square \ Pb \qquad \boxtimes \ HAPS$					
Other	:					
Е.	Is the site a non-major source subject to the Federal Operating Permit Program? $\ \ \ \ \ \ \ \ \ \ \ \ \ $					
F.	Is the site within a local program area jurisdiction?					
G.	Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? ☐ YES ☒ NO					
Н.	I. Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:					
III.	Permit Type					
A.	Type of Permit Requested: (Select only one response)					
⊠ Si	te Operating Permit (SOP)					

Federal Operating Permit Program Site Information Summary Form OP-1 (Page 2)

IV.	Initial Application Information (Complete for Initial Issuance Applications Only.)					
A.	Is this submittal an abbreviated or a full application?	Abbreviated Full				
B.	If this is a full application, is the submittal a follow-up to an abbreviated application?	☐ YES ☐ NO				
C.	If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit?	☐ YES ☐ NO				
D.	Has an electronic copy of this application been submitted (or is being submitted) to EPA (Refer to the form instructions for additional information.)	?				
E.	Has the required Public Involvement Plan been included with this application?	☐ YES ☐ NO				
v.	Confidential Information					
A.	Is confidential information submitted in conjunction with this application?	☐ YES ⊠ NO				
VI.	Responsible Official (RO) Identifying Information					
RO N	Name Prefix: (Mr. Mrs. Ms. Dr.)					
RO F	Full Name: Marlene Mercado					
RO T	Citle: Site Leader					
Emp	loyer Name: Westlake Epoxy Inc.					
Maili	ing Address: P.O. Box 1311					
City:	City: Deer Park					
State	: TX					
ZIP (Code: 77536					
Terri	tory:					
Coun	atry: United States					
Foreign Postal Code:						
Inter	nal Mail Code:					
Telep	phone No.: 281-727-3151					
Fax 1	No.:					
Emai	Email: mmercado@westlake.com					

Federal Operating Permit Program Site Information Summary Form OP-1 (Page 3)

VII. Technical Contact Identifying Information (Complete if different from RO.)
Technical Contact Name Prefix: (Mr. Mrs. Mrs. Dr.)
Technical Contact Full Name: Susan Newman
Technical Contact Title: Principal-Environmental Specialist
Employer Name: Westlake Epoxy Inc.
Mailing Address: P.O. Box 1311
City: Deer Park
State: TX
ZIP Code: 77536
Territory:
Country: United States
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 281-727-3153
Fax No.:
Email: snewman@westlake.com
VIII. Reference Only Requirements (For reference only.)
A. State Senator: District 6 - Senator Carol Alvarado
B. State Representative: District 144 - Representative Mary Ann Perez
C. Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? ☐ YES ☐ NO ☐ N/A
D. Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? ☐ YES ☐ NO
E. Indicate the alternate language(s) in which public notice is required: Spanish

Federal Operating Permit Program Site Information Summary Form OP-1 (Page 4)

IX.	Off-Site Permit Request (Optional for applicants requesting to hold the FOP and records at an off-site location.)
A.	Office/Facility Name:
В.	Physical Address:
City:	
State:	
ZIP C	Code:
Territ	tory:
Coun	try:
Forei	gn Postal Code:
C.	Physical Location:
D.	Contact Name Prefix: (Mr. Mrs. Dr.)
Conta	act Full Name:
Е.	Telephone No.:
X.	Application Area Information
A.	Area Name: Westlake Deer Park – BPA
В.	Physical Address: 5900 Highway 225 Gate 7B
City:	Deer Park
State:	TX
ZIP C	Code: 77536
C.	Physical Location: 5900 Highway 225 Gate 7B
D.	Nearest City: Deer Park
E.	State: TX
F.	ZIP Code: 77536

Federal Operating Permit Program Site Information Summary Form OP-1 (Page 5)

X.	Application Area Information (continued)					
G.	Latitude (nearest second): 29° 42' 42" N					
Н.	Longitude (nearest second): 95° 07' 06" W					
I.	Are there any emission units that were not in compliance with the applicable requirements identified in the application at the time of application submittal? ☐ YES ☒ NO					
J.	Indicate the estimated number of emission units in the application area: 38					
K.	Are there any emission units in the application area subject to the Acid Rain Program? ☐ YES ☒ NO					
XI.	Public Notice (Complete this section for SOP Applications and Acid Rain Permit Applications only.)					
A.	Name of a public place to view application and draft permit: Deer Park Public Library					
В.	Physical Address: 3009 Center St					
City:	Deer Park					
ZIP (Code: 77536					
C.	Contact Person (Someone who will answer questions from the public during the public notice period):					
Conta	act Name Prefix: (Mr. Mrs. Ms. Dr.):					
Conta	act Person Full Name: Susan Newman					
Conta	act Mailing Address: P. O. Box 1311					
City:	Deer Park					
State	State: TX					
ZIP Code: 77536						
Territory:						
Coun	ountry: United States					
Forei	oreign Postal Code:					
Internal Mail Code:						
Telep	Telephone No.: 281-727-3153					

Federal Operating Permit Program Site Information Summary Form OP-1 (Page 6)

XII. Delinquent Fees and Penalties
Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of Attorney General on behalf of the TCEQ are paid in accordance with the "Delinquent Fee and Penalty Protocol."
Complete Sections XIII and XIV for Acid Rain Permit and CSAPR applications only. Please include a copy of the Certificate of Representation submitted to EPA.
XIII. Designated Representative (DR) Identifying Information
DR Name Prefix: (Mr. Mrs. Dr.)
DR Full Name:
DR Title:
Employer Name:
Mailing Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.:
Fax No.:
Email:

Federal Operating Permit Program Site Information Summary Form OP-1 (Page 7) Texas Commission on Environmental Quality

Complete Sections XIII and XIV for Acid Rain Permit and CSAPR applications only. Please include a copy of the Certificate of Representation submitted to EPA.
XIV. Alternate Designated Representative (ADR) Identifying Information
ADR Name Prefix: (Mr. Mrs. Ms. Dr.)
ADR Full Name:
ADR Title:
Employer Name:
Mailing Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.:
Fax No.:
Email:

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

Date: November 30, 2023	
Permit No.: O1942	
Regulated Entity No.: RN102590775	
Company Name: Westlake Epoxy Inc.	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA?	NO
I. Application Type	
Indicate the type of application:	
⊠ Renewal	
Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
Significant Revision	
Revision Requesting Prior Approval	
Administrative Revision	
Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only	NO
For GOP Revisions Only	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 (Cor	nplete this section if the	permit revision is due t	o a change at the site o	r 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].)						
$\boxtimes V$	\square NO _X	$\boxtimes \mathbf{SO}_2$	\square PM ₁₀	СО	☐ Pb	⊠ HAP	
Other							
IV.	Reference Only Requirements	s (For reference only)					
Has t	e applicant paid emissions fee	s for the most recent ag	gency fiscal year (Septe	mber 1 - August 31)?		YES NO N/A	
V.	Delinquent Fees and Penalties	S					
	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: November 30, 2023	
Permit No.: O1942	
Regulated Entity No.: RN102590775	
Company Name: Westlake Epoxy Inc.	

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

			Unit/Group	Process		
Revision No.	Revision Code	New Unit	ID No.	Applicable Form	NSR Authorization	Description of Change and Provisional Terms and Conditions
1	MS-A	No	V2426B	OP-UA3	18738	Updated vapor pressure reference.

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

Date	:: November 30, 2023				
Pern	Permit No.: O1942				
Regi	Regulated Entity No.: RN102590775				
Com	pany Name: Westlake Epoxy Inc.				
I.	Significant Revision (Complete this section if you are submitting a significant revision application or a renewal application significant revision.)	n that includes a			
A.	Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322?	⊠ YES □ NO			
B.	Indicate the alternate language(s) in which public notice is required: Spanish				
C.	Will, there be a change in air pollutant emissions as a result of the significant revision?	☐ YES ⊠ NO			

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

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

Pollutant	Description of the Change in Pollutant Emissions

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

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

I. Identifying Information						
RN: 102 590 775	CN: 605 982 53	7	Account No.: HX-2786-H			
Permit No.: O-01942		Project No.: n/a				
Area Name: Westlake Deer Park – 1	BPA	Company Name:	Westlake Epoxy In	c.		
II. Certification Type (Please n	ark the appropriate	box)				
Responsible Official		Duly Author	rized Representativ	e		
III. Submittal Type (Please mar	k the appropriate box	s) (Only one respon	se can be accepted	per form)		
SOP/TOP Initial Permit Applica	tion 🔲 Upda	te to Permit Applica	ation			
GOP Initial Permit Application	Nerm:	it Revision, Renewa	al, or Reopening			
Other:						
IV. Certification of Truth						
This certification does not extend only.	to information whic	ch is designated by	the TCEQ as info	ormation for reference		
I, Marlene Mercado	certify	that I am the	RO			
(Certifier Name printed or			(RO or D	4R)		
and that, based on information and the time period or on the specific da				nformation dated during		
Note: Enter Either a Time Period (certification is not valid without do		or each certification	n. This section musi	t be completed. The		
Time Period: From		to				
	Start Date		End Date			
Specific Dates: <u>11/30/2023</u> <i>Date 1</i>	Date 2 Date	e 3 Date 4	Date 5	Date 6		
Signature: Harlene	Hucado		Signature Date:	11/27/2023		
Title: Site Leader				·		

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

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

I. Identifying Information					
Account No.: HX-2786-H	RN: 102 590 77	5	CN: 605 982 537		
Permit No.: O-01940	Area Name: We	stlake Epoxy D	Deer Park – Resins		
Company Name: Westlake Epoxy I	nc.				
II. Change Type					
Action Type:	New Appoin	tment	Administrative Information Change		
Contact Type (only one response co	an be accepted per for	·m):			
Responsible Official	Designated I	Representative	☐ Alternate Designated Representative		
III. Responsible Official/Design	ated Representative	Alternate Des	signated Representative Information		
Conventional Title: (Mr. Mr. Mr.	rs. 🗌 Ms. 🔲 Dr.)				
Name: Prashanth Hejmadi					
Title: Plant Manager		Appointment Effective Date: 2/1/2024			
Telephone No.: (281) 727-3151		Fax No.:			
Company Name: Westlake Epoxy I	nc.		·		
Mailing Address: PO Box 1311			,		
City: Deer Park	St	ate: TX	ZIP Code: 77536		
E-mail Address: phejmadi@westlal	ke.com				
IV. Certification of Truth, Accu	ıracy, and Complete	ness			
This certification does not extend only.	to information, whi	ch is designate	ed by the TCEQ as information for reference		
I, Pra	shanth Hejmadi		certify that, based on information		
(Nam	ne printed or typed)				
		ts and informat	tion stated above are true, accurate, and complete.		
Signature: Washanty	Kepli		Signature Date: 4/24/2024		

Form OP-CRO2 Change of Responsible Official (Extension) Federal Operating Permit Program

V. Additional Identifying Informa	tion			
Account No.: HX-2786-H	RN: 102 590 775		CN: 605 982 537	
Permit No.: O-01942		Area Name: Westla	ke Epoxy Deer Park – BPA	
Account No.:	RN:		CN:	
Permit No.:		Area Name:		
Account No.:	RN:		CN:	
Permit No.:		Area Name:		
Account No.:	RN:		CN:	
Permit No.:		Area Name:		
Account No.:	RN:		CN:	
Permit No.:		Area Name:		
Account No.:	RN:		CN:	
Permit No.:		Area Name:		
Account No.:	RN:		CN:	
Permit No.:		Area Name:		
Account No.:	RN:		CN:	
Permit No.:		Area Name:		
Account No.:	RN:		CN:	
Permit No.:		Area Name:		
Account No.:	RN:		CN:	
Permit No.:		Area Name:		
Account No.:	RN:		CN:	
Permit No.:		Area Name:		
Account No.:	RN:		CN:	
Permit No.:		Area Name:		
Account No.:	RN:		CN:	
Permit No.:		Area Name:		
Account No.:	RN:		CN:	
Permit No.:		Area Name:		

TCEQ Use Only



TCEQ Core Data Form

For detailed instructions on completing this form, please read the Core Data Form Instructions or call 512-239-5175.

SECTION I: General Information

1. Reason for Submission (If other is checked please	describe in space provided.)			
New Permit, Registration or Authorization (Core L	ata Form should be submitted with	the program application.)		
Renewal (Core Data Form should be submitted wi	Other Assignment of new Responsible Official			
2. Customer Reference Number (if issued)	Follow this link to search	3. Regulated Entity Reference Number (if issued)		
CN 605982537	for CN or RN numbers in Central Registry**	RN 102590775		

SECTION II: Customer Information

		•											2/4/2024
4. General Cu	istomer Ir	iformat	ion	5. Effective	Date for Cu	ustome	er Into	rmation	Update	es (mm/dd/	уууу)		2/1/2024
☐ New Custor				pdate to Custo					•	egulated Ent	ity Owne	ership	
☐Change in Le	egal Name	(Verifiabl	le with the Tex	kas Secretary o	of State or Tex	as Com	ptrolle	er of Public	Accour	nts)			
The Custome	r Name su	ıbmitte	d here may l	be updated a	utomatical	ly base	ed on	what is c	urrent	and active	with th	ne Texas Secr	etary of State
(SOS) or Texa	s Comptro	oller of	Public Accou	ınts (CPA).							Į.		
6. Customer Legal Name (If an individual, print last name first: eg: Doe, John)				lohn)			<u>If new</u>	v Customer,	enter pre	evious Custom	er below:		
Westlake Epoxy	/ Inc.												
7. TX SOS/CP	A Filing N	umber		8. TX State	Тах ID (11 d	igits)			9. Fe	deral Tax II	D	10. DUNS I	Number (if
									(9 dig	its)		applicable)	
									-				
									87-25	83007			
11. Type of C	ustomer:			tion				☐ Individual Partnership: [ership: 🔲 Gen	eral 🔲 Limited		
Government:	City 🔲	County	Federal 🗌	Local State	e 🗌 Other		☐ Sole Proprietorship ☐ Other:						
12. Number o	of Employ	ees		11 8 23 1 1 1 1	P		13. Independently Owned and Operated?						
0-20	21-100 [101-2	50 🗌 251-	500 🛭 501	and higher		⊠ Yes □ No						
14. Customei	Role (Pro	posed or	· Actual) – as i	t relates to the	Regulated E	ntity list	ted on	this form.	Please o	check one of	the follo	owing	
Owner		Ор	erator	900000	wner & Opera					□ Other:			(
Occupation	al Licensee	R	esponsible Pa	rty 🔲	VCP/BSA App	olicant							
45 04 11	12650 Di	rectors [)r	The San Area									
15. Mailing	Suite 100)											
Address:	City	Staffo	rd		State	TX		ZIP	7747	7		ZIP + 4	
	City											Modelling By St	
16. Country (Mailing In	formati	on (if outside	USA)			17. E-Mail Address (if applicable)						
							avar	nderkaay@	westlal	ke.com			
18. Telephone Number 19. Extension or				on or C	ode			20. Fax N	umber	(if applicable)			

(614) 519-7866		() -
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SECTION III: Regulated	Entity	Information
------------------------	--------	--------------------

21. General Regulated En	itity Informa	tion (If 'New Reg	gulated Entity" is sel	ected, a new p	ermit applica	ation is also re	equired.)		
☐ New Regulated Entity ☐ Update to Regulated Entity Name ☐ Update to Regulated Entity Information									
The Regulated Entity Name submitted may be updated, in order to meet TCEQ Core Data Standards (removal of organizational endings such as Inc, LP, or LLC).									
22. Regulated Entity Name (Enter name of the site where the regulated action is taking place.)									
Westlake Epoxy Deer Park									
23. Street Address of	5900 Highw	ay 225, Gate 7B							
the Regulated Entity:									
(No PO Boxes)	City	Deer Park	State	ТХ	ZIP	77536		ZIP + 4	
24. County									
	1	If no Stree	et Address is prov	rided, fields 2	5-28 are re	quired.			
25. Description to									
Physical Location:									
26. Nearest City						State		Nea	rest ZIP Code
Latitude/Longitude are re used to supply coordinate					ata Stande	ards. (Geoco	ding of the	Physical .	Address may be
27. Latitude (N) In Decim	al:		28. Lon		ongitude (\	ngitude (W) In Decimal:			
Degrees	Minutes								
Degrees	Minutes		Seconds	Degre	es	Mir	iutes		Seconds
	Trinaces		Seconds	Degre	es	Mir			
29. Primary SIC Code		Secondary SIC		31. Primar	y NAICS Co		32. Secon	dary NAIC	
	30.	Secondary SIC			y NAICS Co			-	
29. Primary SIC Code (4 digits)	30. (4 di	igits)	Code	31. Primar (5 or 6 digit	y NAICS Co		32. Secon	-	
29. Primary SIC Code	30. (4 di	igits)	Code	31. Primar (5 or 6 digit	y NAICS Co		32. Secon	-	
29. Primary SIC Code (4 digits)	30. (4 di	igits)	Code	31. Primar (5 or 6 digit	y NAICS Co		32. Secon	-	
29. Primary SIC Code (4 digits) 33. What is the Primary E	30. (4 di	igits) his entity? (De	Code	31. Primar (5 or 6 digit	y NAICS Co		32. Secon	-	
29. Primary SIC Code (4 digits)	30. (4 di Business of t	igits) his entity? (De	Code	31. Primar (5 or 6 digit	y NAICS Co		32. Secon	-	
29. Primary SIC Code (4 digits) 33. What is the Primary E	30. (4 di Business of t	igits) his entity? (De	Code	31. Primar (5 or 6 digit	y NAICS Co		32. Secon	-	
29. Primary SIC Code (4 digits) 33. What is the Primary E	30. (4 di	his entity? (Da	Code o not repeat the SIC State	31. Primar (5 or 6 dight or NAICS descr	y NAICS Co	ode	32. Secon	ts)	
29. Primary SIC Code (4 digits) 33. What is the Primary E 34. Mailing Address:	30. (4 di	his entity? (De	Code o not repeat the SIC State	31. Primar (5 or 6 digit or NAICS descr	y NAICS Co	ode	32. Secon (5 or 6 digi	ZIP + 4	

39. TCEQ Programs and ID Numbers Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form. See the Core Data Form instructions for additional guidance.

TCEQ-10400 (11/22) Page 2 of 3

Dam Safet	у	Districts	Edwards Aquifer		Emissions	Inventory Air	☐ Industrial Hazardous Waste
							Operator Only not Owner/Operator
							TX SWR – 86341
					НХ-2786-Н, Н	X-2725-E	EPA ID - TXR000035410
Municipal:	Solid Waste	New Source Review Air	OSSF		Petroleum	n Storage Tank	□ PWS
		18738, 3181, 3182, 83824, 3180, 3177, 6949. Registrations 148017, 148900, 155623, 53269, 49767, 52053				V	
Sludge		Storm Water	☐ Title V Air		Tires		Used Oil
			1940, 1941, 1942		=======================================		
☐ Voluntary (Cleanup	Wastewater	☐ Wastewater Agricul	lture	☐ Water Rights		Other:
			430				P06743 (Poll Prev Plan)
						*	4820101535 (AFS #)
SECTIO	N IV: Pi	reparer Info	<u>ormation</u>				
40. Name:	Susan Newma	ın		41. Title:	Environr	nental Specialist	
42. Telephone	Number	43. Ext./Code	44. Fax Number	45. E-Ma	ail Address		× = ====
(281)727-3153	3		() -	snewman	@westlake.co	om	-
SECTIO	N V: Au	uthorized Si	ignature				
6. By my signatu	ıre below, I certi	fy, to the best of my know					and that I have signature authority ntified in field 39.
Company:	Westlak	e Epoxy Inc.		Job Title:	Plant N	lanager, Deer Park	, TX
Name (In Print)): Prashan	th Hejmadi		I		Phone:	(281) 727- 3151
Signature:	1	7. 1 51	h			Date:	11/21/2024

3 EMISSION UNIT INFORMATION

This section contains the information relating to emission units addressed by the Federal Operating Permit.

3.1 INDIVIDUAL UNIT SUMMARY FOR REVISIONS (FORM OP-SUMR)

Form OP-SUMR is submitted with this application to document the unit and process changes.

3.2 UNIT ATTRIBUTE FORMS (UA FORMS)

This section contains the following unit attribute forms:

_	OP-UA3, Table 4:	Title 30 Texas Administrative Code Chapter 115 (30 TAC
		Chapter 115) Subchapter B: Storage of Volatile Organic

Compounds (VOCs);

_	OP-UA3, Table 9:	Title 40 Code of Federal Regulations Part 63 (40 CFR Part
		63) Subpart G: National Emission Standards for Organic

63) Subpart G: National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Storage Vessels;

OP-UA4, Table 1: Title 30 Texas Administrative Code Chapter 115 (30 TAC

Chapter 115) Subchapter C: Loading and Unloading of

Volatile Organic Compounds;

- OP-UA4, Table 7: Title 40 Code of Federal Regulations Part 63 (40 CFR Part

63) Subpart G: National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Transfer Operations

OP-UA7, Table 1: Title 30 Texas Administrative Code Chapter 111 (30 TAC

Chapter 111) Control of Air Pollution from Visible

Emissions and Particulate Matter;

- OP-UA7, 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;

OP-UA7, 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;

- OP-UA12, 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;
- OP-UA12, Table 4a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60) Subpart VV: Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry;
- OP-UA12, Table 9a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63) Subpart H: National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks;
- OP-UA15, Table 1: Title 30 Texas Administrative Code Chapter 111 (30 TAC Chapter 111) Subchapter A: Visible Emissions
- OP-UA15, Table 2: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115) Subchapter B: Vent Gas Control
- OP-UA15, Table 6: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63) Subpart G: National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents
- OP-UA15, Table 15: Title 30 Texas Administrative Code Chapter 111 (30 TAC Chapter 111) Subchapter A, Division 5: Emission Limits on Nonagricultural Processes
- OP-UA19, Table 1: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115) Subchapter B: Industrial Wastewater;
- OP-UA60, Table 1: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63) Subpart F: National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry

Texas Commission on Environmental Quality Federal Operating Permit Program Individual Unit Summary for Revisions Form OP-SUMR 11/30Table 1

Date	Permit No.	Regulated Entity No.		
11/30/2023	O1942	RN102590775		

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
	1	V2426B	OP-UA3 OP-REQ2	TANK		18738	

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)

Date	Permit No.	Regulated Entity No.
11/30/2023	01942	RN102590775

Unit ID No.	SOP/GOP Index No.	Alternate Control Requirement	ACR ID No.	Product Stored	Storage Capacity	Throughput	Potential to Emit	Uncontrolled Emissions
V2426B	R5112-1	NO		VOC1	A25K-40K			
T147	R5112-3	NO		VOC1	A1K-25K			
T1857	R5112-3	NO		VOC1	A1K-25K			
T20100	R5112-4	NO		VOC1	A40K+			
T2414	R5112-5	NO		VOC1	A40K+			
T2415	R5112-5	NO		VOC1	A40K+			
T18508	R5112-5	NO		VOC1	A40K+			
T9554	R5112-6	NO		VOC1	A40K+			
T20801	R5112-6	NO		VOC1	A40K+			
T20802	R5112-6	NO		VOC1	A40K+			
T2133	R5112-1	NO		VOC1	A40K+			
T2413B	R5112-7	NO		VOC1	A1K-25K			
T20601	R5112-2	NO		VOC1	A1K-25K			
T18509	R5112-2	NO		VOC1	A1K-25K			
T18521	R5112-2	NO		VOC1	A1K-25K			
V18571	R5112-2	NO		VOC1	A1K-25K			

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)

Date	Permit No.	Regulated Entity No.
11/30/2023	01942	RN102590775

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.
V2426B	R5112-1		NONE1	1-1.5				
T147	R5112-3		NONE1	1-1.5				
T1857	R5112-3		NONE1	1-1.5				
T20100	R5112-4		SPVRS1	1.5+A			FLARE	A20600
T2414	R5112-5		NONE1	1-				
T2415	R5112-5		NONE1	1-				
T18508	R5112-5		NONE1	1-				
T9554	R5112-6		IFR1	1-				
T20801	R5112-6		NONE1	1-				
T20802	R5112-6		IFR1	1-				
T2133	R5112-1		NONE1	1-1.5				
T2413B	R5112-7		SPVRS1	1.5+A			VRU	C20805
T20601	R5112-2		NONE1	1-				
T18509	R5112-2		NONE1	1-				
T18521	R5112-2		NONE1	1-				
V18571	R5112-2		NONE1	1-				

Storage Tank/Vessel Attributes Form OP-UA3 (Page 13)

Federal Operating Permit Program

Table 9a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart G: National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Storage Vessels

Date	Permit No.	Regulated Entity No.		
11/30/2023	O1942	RN102590775		

Unit ID No.	SOP Index No.	MACT Subpart F/G Applicability	NESHAP Subpart Y Applicability	NSPS Subpart Kb Applicability	Maximum TVP	Emission Control Type	AMOC ID No.
T20100	63G-1	YES	NO		11.11-	CVS-CD	
T2133	63G-2	YES	NO		11.11-	CVS-CD	
T2414	63G-3	NO	NO	NO			
T2415	63G-1	NO	NO	NO			
V2426B	63G-3	NO	NO	NO			
T9554	63G-3	NO	NO	NO			
T20801	63G-3	NO	NO	NO			
T20802	63G-3	NO	NO	NO			
T18508	63G-3	NO	NO	NO			
T20601	63G-3	NO	NO	NO			
T18509	63G-3	NO	NO	NO			
T18521	63G-3	NO	NO	NO			
V18571	63G-3	NO	NO	NO			

Storage Tank/Vessel Attributes Form OP-UA3 (Page 14)

Federal Operating Permit Program

Table 9b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart G: National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Storage Vessels

Date	Permit No.	Regulated Entity No.		
11/30/2023	O1942	RN102590775		

Unit ID No.	SOP Index No.	Seal Type	Closed Vent System	Hard Piping	Bypass Lines	Control Device Type	Control Device ID No.	Control Device Design	Design Evaluation Submitted
T20100	63G-1		SUBPTG	YES	NONE	FLARE	A20600		
T2133	63G-2		SUBPTG	YES	NONE	OTHER	V18520	NO	YES
T2414	63G-3								
T2415	63G-1								
V2426B	63G-3								
T9554	63G-3								
T20801	63G-3								
T20802	63G-3								
T18508	63G-3								
T20601	63G-3								
T18509	63G-3								
T18521	63G-3								
V18571	63G-3								

Loading/Unloading Operations Attributes Form OP-UA4 (Page 1)

Federal Operating Permit Program

Table 1a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115) Subchapter C: Loading and Unloading of Volatile Organic Compounds Texas Commission on Environmental Quality

Date	Permit No.:	Regulated Entity No.
11/30/2023	O1942	RN102590775

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
C5LOAD_UN	R5212-1	OTHER	NONE		VOC1	ВОТН	0.5+	20K-	
MSHLOAD_UN	R5212-1	OTHER	NONE		VOC1	ВОТН	0.5+	20K-	
PHNLOAD_UN	R5212-2	OTHER	NONE		VOC1	ВОТН	0.5-		
IPELOAD_UN	R5211-1	OTHER	NONE		VOC1	ВОТН	0.5+	20K-	
LPELOAD_UN	R5211-2	OTHER	NONE		VOC1	ВОТН	0.5-		
CAT-UNLOAD	R5211-2	OTHER	NONE		VOC1	UNLOAD	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.	
11/30/2023	O1942	RN102590775	

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
C5LOAD_UN	R5212-1							
MSHLOAD_UN	R5212-1							
PHNLOAD_UN	R5212-2							
IPELOAD_UN	R5211-1							
LPELOAD_UN	R5211-2							
CAT-UNLOAD	R5211-2							

Loading/Unloading Operations Attributes Form OP-UA4 (Page 9)

Federal Operating Permit Program

Table 7a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart G: National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Transfer Operations Texas Commission on Environmental Quality

Date	Permit No.:	Regulated Entity No.	
11/30/2023	O1942	RN102590775	

Unit ID No.	SOP Index No.	Transfer Rack Type	Subject to Subpart BB	Compliance Options	Closed Vent System	Hard Piping
C5LOAD_UN	63G-1	GRP2	NO			
PHNLOAD_UN	63G-1	GRP2	NO			
IPELOAD_UN	63G-1	GRP2	NO			
LPELOAD_UN	63G-2	GRP2	NO			

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.	
11/30/2023	01942	RN102590775	

Unit ID No.	SOP/GOP Index No	Acid Gases Only	Emergency/Upset Conditions Only	Alternate Opacity Limitation (AOL)	AOL ID No.	Construction Date
A20600	R1111-1	NO	NO			

Texas Commission on Environmental Quality Flare Attributes Form OP-UA7 (Page 3)

Federal Operating Permit Program

Table 3: Title 40 Code of Federal Regulations Part 60 and 61 (40 CFR Part 60 and 40 CFR Part 61)

Subpart A: General Provisions of Standards of Performance for New Stationary Sources and National Emission Standards for Hazardous Air Pollutants

Date	Permit No.:	Regulated Entity No.	
11/30/2023	01942	RN102590775	

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
A20600	60A-1	YES	YES	AIR		

Texas Commission on Environmental Quality Flare Attributes Form OP-UA7 (Page 4)

Federal Operating Permit Program

Table 4: Title 40 Code of Federal Regulations Part 63

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

Date	Permit No.:	Regulated Entity No.	
11/30/2023	01942	RN102590775	

Unit ID No.	SOP/GOP Index No.	Required Under 40 CFR Part 63	Heat Content Specification	Flare Assist Type	Flare Exit Velocity	Heating Value of Gas
A20600	63A-1	YES	YES	AIR		

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

Date	Permit No.	Regulated Entity No.
11/30/2023	01942	RN102590775

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
BPA4FE	R5352ALL				

Fugitive Emission Unit Attributes Form OP-UA12 (Page 32)

Federal Operating Permit Program

Table 4a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

Subpart VV: Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006

Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.	
11/30/2023	01942	RN102590775	

Unit ID No.	SOP Index No.	Produces Chemicals	Affected Facility	Construction/ Modification Date	Compliance Option	Design Capacity	Produces Heavy Liquid Chemicals	Beverage Alcohol Production
BPA4FE	60VVALL							

Fugitive Emission Unit Attributes Form OP-UA12 (Page 70)

Federal Operating Permit Program

Table 9a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart H: National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.	
11/30/2023	01942	RN102590775	

Unit ID No.	SOP Index No.	Equipment Type	Non Research and Development/Batch Processes	Vacuum Service	Less Than 300 Operating Hours	Heavy Liquid Service	AMEL
BPA4FE	63HALL						

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes Form OP-UA15 (Page 1)

Federal Operating Permit Program

Table 1a: Title 30 Texas Administrative Code Chapter 111 (30 TAC Chapter 111)

Subchapter A: Visible Emissions

Date	Permit No.	Regulated Entity No.	
11/30/2023	01942	RN102590775	

Emission Point ID No.	SOP/GOP Index No.	Alternate Opacity Limitation	AOL ID No.	Vent Source	Opacity Monitoring System	Construction Date	Effluent Flow Rate
A18258	R1111-1	NO		OTHER	NONE	72+	100-
S18509	R1111-2	NO		OTHER	NONE	72+	100-
S18512	R1111-3	NO		OTHER	NONE	72+	100-
A1921	R1111-4	NO		OTHER	NONE	72+	100-

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes Form OP-UA15 (Page 2)

Federal Operating Permit Program

Table 1b: Title 30 Texas Administrative Code Chapter 111 (30 TAC Chapter 111)

Subchapter A: Visible Emissions

Date	Permit No.	Regulated Entity No.	
11/30/2023	01942	RN102590775	

Emission Point ID No.	SOP Index No.	Annual ACF	Heat Input	State Implementation Plan (SIP) Violation	Total Feed Capacity
A18258	R1111-1				
S18509	R1111-2				
S18512	R1111-3				
A1921	R1111-4				

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

Date	Permit No.	Regulated Entity No.
11/30/2023	01942	RN102590775

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
BPA4	R5121-1	NO	NO	REGVAPPL		100+	612+	NO
AE40600	R5121-2	NO	NO	REGVAPPL		100+	612+	YES
AE40601	R5121-2	NO	NO	REGVAPPL		100+	612+	YES

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

Date	Permit No.	Regulated Entity No.	
11/30/2023	01942	RN102590775	

Emission Point ID No.	SOP Index No.	Alternate Control Requirement	ACR ID No.	Control Device Type	Control Device ID No.
BPA4	R5121-1	NONE		FLARE	A20600
AE40600	R5121-2				
AE40601	R5121-2				

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes Form OP-UA15 (Page 13)

Federal Operating Permit Program

Table 6a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart G: National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic

Organic Chemical Manufacturing Industry for Process Vents

Date	Permit No.	Regulated Entity No.
11/30/2023	01942	RN102590775

Emission Point ID No.	SOP Index No.	Overlap	Group 1	Regulation	HAP Concentration	Flow Rate	Electing Control	NSPS TRE Index Value	MACT TRE Index Value	Plant Type
BPA4	63G-1	NNN	YES							

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes Form OP-UA15 (Page 14)

Federal Operating Permit Program

Table 6b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart G: National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic

Organic Chemical Manufacturing Industry for Process Vents

Date	Permit No.	Regulated Entity No.
11/30/2023	01942	RN102590775

Emission Point ID No.	SOP Index No.	Control Device	Control Device ID No.	Halogenated	TRE for Halogenated Vent Stream	Halogen Reduction Device	Installation Date	Performance Test
BPA4	63G-1	FLARE	A20600	NO				YES

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes Form OP-UA15 (Page 15)

Federal Operating Permit Program

Table 6c: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart G: National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic

Organic Chemical Manufacturing Industry for Process Vents

Date	Permit No.	Regulated Entity No.
11/30/2023	01942	RN102590775

Emission Point ID No.	SOP Index No.	Alternate Monitoring Parameters (AMP)	AMP ID No.	Continuous Monitoring	Continuous Monitoring Alt ID No.	Bypass Lines	Flow Indicator
BPA4	63G-1	NO		NOALT		NO	

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes Form OP-UA15 (Page 40)

Federal Operating Permit Program

Table 15: Title 30Texas Administrative Code Chapter 111 (30 TAC Chapter 111) Subchapter A, Division 5: Emission Limits on Nonagricultural Processes Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.	
11/30/2023	01942	RN102590775	

SOP Index No.	Effective Stack Height
R1111-1	NO
R1111-2	NO
R1111-3	NO
	R1111-1 R1111-2

Texas Commission on Environmental Quality Wastewater Unit Attributes Form OP-UA19 (Page 1) Federal Operating Permit Program

Table 1a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115) Subchapter B: Industrial Wastewater

Date: 11/30/2023	Permit No.: O1942	RN Number: RN102590775
Area Name: Westlake Deer Park –	ВРА	CN Number: CN605982537

Unit ID No.	SOP Index No.	Petroleum Refinery	Alternate Control Requirement	ACR ID No.	90% Overall Control Option	Safety Hazard Exemption	Safety Hazard Exemption ID No.
BPA4WW	R5142-1	NO	NO		NO	NO	
		_					
		_					

Texas Commission on Environmental Quality Wastewater Unit Attributes Form OP-UA19 (Page 2) Federal Operating Permit Program

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

Subchapter B: Industrial Wastewater

Date: 11/30/2023	Permit No.: O1942	RN Numb	per: RN102590775
Area Name: Westlake Deer Park -	- BPA		CN Number: CN605982537

Unit ID No.	SOP Index No.	Wastewater Component Type	Roof or Seal Type	Control Devices	Control Device ID No.	Monitoring Type
BPA4WW	R5142-1	OTHER	NONE	OTHER		NO

Form OP-UA60 (Page 1) Federal Operating Permit Program

Table 1a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart F: National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry

Date: 11/30/2023	Permit No.: O1942	Regulated Entity No.: RN102590775
Area Name: Westlake Deer Park -	BPA	Customer Reference No.: CN605982537

Process ID No.	SOP Index No.	Applicable Chemicals	Table 2 HAP	Alternate Means of Emission Limitation (AMEL)	Heat Exchange System	Cooling Water Pressure
PROBPA	63F-1	YES	YES	NO	YES	NO

Chemical Manufacturing/Elastomer/Thermoplastic Process Unit Attributes Form OP-UA60 (Page 2) Federal Operating Permit Program

Table 1b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart F: National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry

Date: 11/30/2023	Permit No.: O1942	Regulated Entity No.: RN102590775
Area Name: Westlake Deer Park - BPA		Customer Reference No.: CN605982537

Process ID No.	SOP Index No.	Intervening Cooling Fluid	Table 4 HAP Content	NPDES Permit	Meets 40 CFR § 63.104(a)(4)(i) - (iv)	Table 9 HAP Content	Cooling Water Monitored
PROBPA	63F-1	NO	NO	NO	NO	NO	NO

4 POTENTIALLY APPLICABLE REQUIREMENTS INFORMATION

This section contains information relating to applicability determinations in the FOP.

4.1 APPLICATION AREA-WIDE APPLICABILITY DETERMINATIONS AND GENERAL INFORMATION (FORM OP-REQ1)

This section contains the updated Form OP-REQ1.

4.2 NEGATIVE APPLICABLE REQUIREMENT DETERMINATIONS (FORM OP-REQ2)

Form OP-REQ2 is a mechanism by which negative applicability determinations can be documented in the FOP application. This section contains the updated Form OP-REQ2.

4.3 APPLICABLE REQUIREMENTS SUMMARY (FORM OP-REQ₃)

Westlake is requesting several changes to the currently permitted applicable requirements and is submitting an OP-REQ3 for those sources being updated. Sources which do not have any changes from the currently permitted applicability are not included on the OP-REQ3.

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For SOP applications, answer ALL questions unless otherwise directed.

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

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For SOP applications, answer ALL questions unless otherwise directed.

Fori	m OP-	REQ1	: Pag	e 2					
I.	Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter (continued)								
	В.	B. Materials Handling, Construction, Roads, Streets, Alleys, and Parking Lots							
		1.	Item	s a - d determines applicability of any of these requirements based on geographic	phical loc	ation.			
♦			a.	The application area is located within the City of El Paso.	□YES	\boxtimes NO			
*			b.	The application area is located within the Fort Bliss Military Reservation, except areas specified in 30 TAC § 111.141.	□YES	⊠NO			
*			c.	The application area is located in the portion of Harris County inside the loop formed by Beltway 8.	□YES	⊠NO			
•			d.	The application area is located in the area of Nueces County outlined in Group II state implementation plan (SIP) for inhalable particulate matter adopted by the TCEQ on May 13, 1988.	□YES	⊠NO			
			If there is any "YES" response to Questions I.B.1.a - d, answers Questions I.B.2.a - d. If all respto Questions I.B.1.a-d are "NO," go to Section I.C.						
		2.	Item	s a - d determine the specific applicability of these requirements.					
♦			a.	The application area is subject to 30 TAC § 111.143.	□YES	□NO			
♦			b.	The application area is subject to 30 TAC § 111.145.	□YES	□NO			
♦			c.	The application area is subject to 30 TAC § 111.147.	YES	□NO			
♦			d.	The application area is subject to 30 TAC § 111.149.	YES	□NO			
	C.	Emi	ssions	Limits on Nonagricultural Processes					
*		1.		application area includes a nonagricultural process subject to 30 TAC 1.151.	⊠YES	□NO			
		2.	subje	application area includes a vent from a nonagricultural process that is ect to additional monitoring requirements. The response to Question I.C.2 is "NO," go to Question I.C.4.	⊠YES	□NO			
		3.		vents from nonagricultural process in the application area are subject to tional monitoring requirements.	□YES	⊠NO			

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For SOP applications, answer ALL questions unless otherwise directed.

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

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For SOP applications, answer ALL questions unless otherwise directed.

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

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For SOP applications, answer ALL questions unless otherwise directed.

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

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For SOP applications, answer ALL questions unless otherwise directed.

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

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For SOP applications, answer ALL questions unless otherwise directed.

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

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For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

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Forn	Form OP-REQ1: Page 11					
III.	Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)					
	L.					
*		3.	Degassing of stationary VOC storage vessels with a nominal storage capacity of 1,000,000 gallons or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	□YES	□NO □N/A	
*		4.	Degassing of stationary VOC storage vessels with a nominal storage capacity of 250,000 gallons or more, or a nominal storage capacity of 75,000 gallons and storing materials with a true vapor pressure greater than 2.6 psia, and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	□YES	□NO □N/A	
*		5.	Degassing of VOC transport vessels with a nominal storage capacity of 8,000 gallons or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	□YES	□NO	
*		6.	Degassing of VOC marine vessels with a nominal storage capacity of 10,000 barrels (420,000 gallons) or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	□YES	□NO □N/A	
•		7.	Degassing of VOC marine vessels with a nominal storage capacity of 10,000 barrels (420,000 gallons) and a vapor space partial pressure \geq 0.5 psia that have sustained damage as specified in 30 TAC \S 115.547(5) is performed in the application area.	□YES	□NO □N/A	
	M. Petroleum Dry Cleaning Systems					
		1.	The application area contains one or more petroleum dry cleaning facilities that use petroleum based solvents.	YES	⊠NO □N/A	

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Form	Form OP-REQ1: Page 12					
III.	Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)					
	N.	N. Vent Gas Control (Highly-reactive volatile organic compounds (HRVOC)				
		1.	The application area includes one or more vent gas streams containing HRVOC.	_YES	⊠NO □N/A	
		2.	The application area includes one or more flares that emit or have the potential to emit HRVOC.	YES	⊠NO □N/A	
			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.			
		3.	All vent streams in the application area that are routed to a flare contain less than 5.0% HRVOC by weight at all times.	YES	□NO	
		4.	All vent streams in the application area that are not routed to a flare contain less than 100 ppmv HRVOC at all times.	☐YES	□NO	
			If the responses to Questions III.N.3 and III.N.4 are both "NO," go to Section III.O.			
		5.	The application area contains pressure relief valves that are not controlled by a flare.	☐YES	□NO	
		6.	The application area has at least one vent stream which has no potential to emit HRVOC.	YES	□NO	
		7.	The application area has vent streams from a source described in 30 TAC § 115.727(c)(3)(A) - (H).	☐YES	□NO	
	0.	Cooli	ing Tower Heat Exchange Systems (HRVOC)			
		1.	The application area includes one or more cooling tower heat exchange systems that emit or have the potential to emit HRVOC.	YES	⊠NO □N/A	

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

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Forn	Form OP-REQ1: Page 14					
IV.	Title	30 T	AC Chapter 117 - Control of Air Pollution from Nitrogen Compounds (continu	ied)		
	C.	Con	nmercial, Institutional, and Industrial Sources in Ozone Nonattainment Areas			
*		1.	The application area is located at a site subject to 30 TAC Chapter 117, Subchapter B and includes units specified in 30 TAC §§ 117.100, 117.300, or 117.400. For SOP applications, if the response to Question IV.C.1 is "NO," go to Question IV.D.1. For GOP applications for GOP 517, if the response to Question IV.C.1 is "NO," go to Section IV.F.	□YES	⊠NO	
♦		2.	The application area is located at a site that was a major source of NO _X before November 15, 1992.	□YES	□NO □N/A	
*		3.	The application area includes an electric generating facility required to comply with the System Cap in 30 TAC § 117.320.	□YES	□NO	
	D.	Adij	pic Acid Manufacturing			
		1.	The application area is located at, or part of, an adipic acid production unit.	□YES	⊠NO □N/A	
	Ε.	Nitr	ic Acid Manufacturing - Ozone Nonattainment Areas			
		1.	The application area is located at, or part of, a nitric acid production unit.	□YES	⊠NO □N/A	
	F.		nbustion Control at Minor Sources in Ozone Nonattainment Areas - Boilers, Pr ionary Engines and Gas Turbines	ocess He	aters,	
*		1.	The application area is located at a site that is a minor source of NO _X in the Houston/Galveston/Brazoria or Dallas/Fort Worth Eight-Hour areas (except for Wise County). For SOP applications, if the response to Question IV.F.1 is "NO," go to Question IV.G.1. For GOP applications, if the response to Question IV.F.1 is "NO," go to Section VI.	⊠YES	□NO	
♦		2.	The application area is located in the Houston/Galveston/Brazoria area and has units that qualify for an exemption under 30 TAC § 117.2003(a).	□YES	⊠NO	
*	_	3.	The application area is located in the Houston/Galveston/Brazoria area and has units that qualify for an exemption under 30 TAC § 117.2003(b).	□YES	⊠NO	

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Form	Form OP-REQ1: Page 15					
IV.	Title	e 30 T.	AC Chapter 117 - Control of Air Pollution from Nitrogen Compounds (continu	ied)		
	F.		nbustion Control at Minor Sources in Ozone Nonattainment Areas - Boilers, Prionary Engines and Gas Turbines (continued)	rocess Hea	aters,	
•		4.	The application area is located in the Dallas/Fort Worth Eight-Hour area (except for Wise County) and has units that qualify for an exemption under 30 TAC § 117.2103.	□YES	⊠NO	
*		5.	The application area has units subject to the emission specifications under 30 TAC §§ 117.2010 or 30 TAC § 117.2110.	YES	⊠NO	
		6.	The application area has a unit that has been approved for alternative case specific specifications (ACSS) in 30 TAC § 117.2025 or 30 TAC § 117.2125. If the response to Question IV.F.6 is "NO," go to Section IV.G.	□YES	⊠NO	
		7.	An ACSS for carbon monoxide (CO) has been approved?	□YES	□NO	
		8.	An ACSS for ammonia (NH ₃) has been approved?	YES	□NO	
		9.	Provide the Permit Number(s) and authorization/issuance date(s) of the NSR projection incorporates an ACSS below.	ect(s) that		
	G.	Utili	ty Electric Generation in East and Central Texas			
		1.	The application area includes utility electric power boilers and/or stationary gas turbines (including duct burners used in turbine exhaust ducts) that were placed into service before December 31, 1995. If the response to Question IV.G.1 is "NO," go to Question IV.H.1.	□YES	⊠NO	
		2.	The application area is complying with the System Cap in 30 TAC § 117.3020.	□YES	□NO	
	Н.	Mul	ti-Region Combustion Control - Water Heaters, Small Boilers, and Process He		_ _	
		1.	The application area includes a manufacturer, distributor, retailer or installer of natural gas fired water heaters, boilers or process heaters with a maximum rated capacity of 2.0 MMBtu/hr or less. If the response to question IV.H.1 is "NO," go to Section V.	□YES	⊠NO	
		2.	All water heaters, boilers or process heaters manufactured, distributed, retailed or installed qualify for an exemption under 30 TAC § 117.3203.	□YES	□NO	

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Forn	Form OP-REQ1: Page 16				
V.		Title 40 Code of Federal Regulations Part 59 (40 CFR Part 59) - National Volatile Organic Compound Emission Standards for Consumer and Commercial Products			
	Α.	Subp Coat	bile Refii	nish	
		1.	The application area manufactures automobile refinish coatings or coating components and sells or distributes these coatings or coating components in the United States.	☐YES	⊠NO
		2.	The application area imports automobile refinish coatings or coating components, manufactured on or after January 11, 1999, and sells or distributes these coatings or coating components in the United States.	YES	⊠NO
			If the responses to Questions V.A.1 and V.A.2 are both "NO," go to Section V.B.		
		3.	All automobile refinish coatings or coating components manufactured or imported by the application area meet one or more of the exemptions specified in $40 \text{ CFR } \S 59.100(c)(1)$ - (6).	□YES	□NO
	В.	Subp	part C - National Volatile Organic Compound Emission Standards for Consun	ner Produ	icts
		1.	The application area manufactures consumer products for sale or distribution in the United States.	□YES	⊠NO
		2.	The application area imports consumer products manufactured on or after December 10, 1998 and sells or distributes these consumer products in the United States.	YES	⊠NO
		3.	The application area is a distributor of consumer products whose name appears on the label of one or more of the products. If the responses to Questions V.B.1 - V.B.3 are all "NO," go to Section V.C.	□YES	⊠NO
		4.	All consumer products manufactured, imported, or distributed by the application area meet one or more of the exemptions specified in 40 CFR § 59.201(c)(1) - (7).	□YES	□NO

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Form	Form OP-REQ1: Page 17					
V.		itle 40 Code of Federal Regulations Part 59 (40 CFR Part 59) - National Volatile Organic Compound mission Standards for Consumer and Commercial Products (continued)				
	C.	Subpart D - National Volatile Organic Compound Emission Standards for Architectural Coatings				
		1.	The application area manufactures or imports architectural coatings for sale or distribution in the United States.	□YES	⊠NO	
		2.	The application area manufactures or imports architectural coatings that are registered under the Federal Insecticide, Fungicide, and Rodenticide Act. <i>If the responses to Questions V.C.1-2 are both "NO," go to Section V.D.</i>	☐YES	⊠NO	
		3.	All architectural coatings manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR §59.400(c)(1)-(5).	YES	□NO	
	D.	Subp	oart E - National Volatile Organic Compound Emission Standards for Aerosol	Coatings		
		1.	The application area manufactures or imports aerosol coating products for sale or distribution in the United States.	□YES	⊠NO	
		2.	The application area is a distributor of aerosol coatings for resale or distribution in the United States.	□YES	⊠NO	
	Е.	Subp	oart F - Control of Evaporative Emissions From New and In-Use Portable Fuel	Contain	ers	
		1.	The application area manufactures or imports portable fuel containers for sale or distribution in the United States. If the response to Question V.E.1 is "NO," go to Section VI.	YES	⊠NO	
		2.	All portable fuel containers manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR § 59.605(a) - (c).	YES	□NO	
VI.	Title	40 Ca	de of Federal Regulations Part 60 - New Source Performance Standards			
	A.	A. Applicability				
•		1.	The application area includes a unit(s) that is subject to one or more 40 CFR Part 60 subparts. If the response to Question VI.A.1 is "NO," go to Section VII.	⊠YES	□NO	

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Forn	Form OP-REQ1: Page 18						
VI.	Title	e 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)					
	В.	Subp	Subpart Y - Standards of Performance for Coal Preparation and Processing Plants				
		1.	The application area is located at a coal preparation and processing plant. If the response to Question VI.B.1 is "NO," go to Section VI.C.	□YES	⊠NO		
		2.	The coal preparation and processing plant has a design capacity greater than 200 tons per day (tpd). If the response to Question VI.B.2 is "NO," go to Section VI.C.	□YES	□NO		
		3.	The plant has an option to enforceably limit its operating level to less than 200 tpd and is choosing this option. If the response to Question VI.B.3 is "YES," go to Section VI.C.	□YES	□NO		
		4.	The plant contains an open storage pile, as defined in § 60.251, as an affected facility. If the response to Question VI.B.4 is "NO," go to Section VI.C.	☐YES	□NO		
		5.	The open storage pile was constructed, reconstructed or modified after May 27, 2009.	□YES	□NO		
	C.	Subp	oart GG - Standards of Performance for Stationary Gas Turbines (GOP applic	ants only	·)		
•		1.	The application area includes one or more stationary gas turbines that have a heat input at peak load greater than or equal to 10 MMBtu/hr (10.7GJ/hr), based on the lower heating value of the fuel fired. If the response to Question VI.C.1 is "NO" or "N/A," go to Section VI.D.	□YES	□NO ⊠N/A		
•		2.	One or more of the affected facilities were constructed, modified, or reconstructed after October 3, 1977 and prior to February 19, 2005. If the response to Question VI.C.2 is "NO," go to Section VI.D.	YES	□NO		
•		3.	One or more stationary gas turbines in the application area are using a previously approved alternative fuel monitoring schedule as specified in 40 CFR § 60.334(h)(4).	☐YES	□NO		
*		4.	The exemption specified in 40 CFR § 60.332(e) is being utilized for one or more stationary gas turbines in the application area.	□YES	□NO		

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Forn	n OP-I	REQ1	: Page 19		
VI.	Title	40 C	ode of Federal Regulations Part 60 - New Source Performance Standards (cont	inued)	
	C.	_	part GG - Standards of Performance for Stationary Gas Turbines (GOP application)	cants only	·)
*		5.	One or more stationary gas turbines subject to 40 CFR Part 60, Subpart GG in the application area is injected with water or steam for the control of nitrogen oxides.	YES	□NO
	D.	Subj	part XX - Standards of Performance for Bulk Gasoline Terminals		
		1.	The application area includes bulk gasoline terminal loading racks. If the response to Question VI.D.1 is "NO," go to Section VI.E.	□YES	⊠NO □N/A
		2.	One or more of the loading racks were constructed or modified after December 17, 1980, and are not subject to 40 CFR Part 63, Subpart CC.	☐YES	□NO
	Е.		part LLL - Standards of Performance for Onshore Natural Gas Processing: Sussions	lfur Diox	ide (SO ₂)
*		1.	The application area includes affected facilities identified in 40 CFR § 60.640(a) that process natural gas (onshore). For SOP applications, if the response to Question VI.E.1 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.1 is "NO" or "N/A," go to Section VI.H.	YES	⊠NO
•		2.	The affected facilities commenced construction or modification after January 20, 1984 and on or before August 23, 2011. For SOP applications, if the response to Question VI.E.2 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.2 is "NO," go to Section VI.H.	□YES	□NO
•		3.	The application area includes a gas sweetening unit with a design capacity greater than or equal to 2 long tons per day (LTPD) of hydrogen sulfide but operates at less than 2 LTPD. For SOP applications, if the response to Question VI.E.3 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.3 is "NO," go to Section VI.H.	□YES	□NO

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Forn	Form OP-REQ1: Page 20				
VI.	Title	40 C	ode of Federal Regulations Part 60 - New Source Performance Standards (cont	tinued)	
	Е.	Subpart LLL - Standards of Performance for Onshore Natural Gas Processing: Sulfur Dioxide (SO ₂) Emissions (continued)			
*		4.	Federally enforceable operating limits have been established in the preconstruction authorization limiting the gas sweetening unit to less than 2 LTPD. For SOP applications, if the response to Question VI.E.4. is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.4. is "NO," go to Section VI.H.	□YES	□NO
*		5.	Please provide the Unit ID(s) for the gas sweetening unit(s) that have established operating limits in the space provided below.	federally	enforceable
	F.	Subj	part OOO - Standards of Performance for Nonmetallic Mineral Processing Pla	nts	
		1.	The application area includes affected facilities identified in 40 CFR § 60.670(a)(1) that are located at a fixed or portable nonmetallic mineral processing plant. If the response to Question VI.F.1 is "NO," go to Section VI.G.	☐YES	⊠NO
		2.	Affected facilities identified in 40 CFR § 60.670(a)(1) and located in the application area are subject to 40 CFR Part 60, Subpart OOO.	□YES	□NO
	G.	Subj Syst	part $\mathbf{Q}\mathbf{Q}\mathbf{Q}$ - Standards of Performance for VOC Emissions from Petroleum Reems	finery W	astewater
		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>	☐YES	⊠NO
		2.	The application area includes storm water sewer systems.	□YES	□NO

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Forn	Form OP-REQ1: Page 21					
VI.	Title	Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)				
	G.	Subpart QQQ - Standards of Performance for VOC Emissions from Petroleum Refine Systems (continued)				
		3.	The application area includes ancillary equipment which is physically separate from the wastewater system and does not come in contact with or store oily wastewater.	YES	□NO	
		4.	The application area includes non-contact cooling water systems.	□YES	□NO	
		5.	The application area includes individual drain systems. If the response to Question VI.G.5 is "NO," go to Section VI.H.	□YES	□NO	
		6.	The application area includes one or more individual drain systems that meet the exemption specified in 40 CFR § 60.692-2(d).	□YES	□NO	
		7.	The application area includes completely closed drain systems.	□YES	□NO	
	Н.	Subpart AAAA - Standards of Performance for Small Municipal Waste Incineration Units for Which Construction Commenced After August 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 6, 2004				
•		1.	The application area includes at least one small municipal waste incineration unit, other than an air curtain incinerator. If the response to Question VI.H.1. is "N/A," go to Section VI.I. If the response to Question VI.H.1 is "NO," go to Question VI.H.4.	□YES	⊠NO □N/A	
*		2.	The application area includes at least one small municipal waste incineration unit, other than an air curtain incinerator, constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006.	□YES	□NO	
*		3.	The application area includes at least one small municipal waste incineration unit, other than an air curtain incinerator, constructed before August 30, 1999 and not modified or reconstructed on or after June 6, 2006.	□YES	□NO	
♦		4.	The application area includes at least one air curtain incinerator. If the response to Question VI.H.4 is "NO," go to Section VI.I.	□YES	□NO	

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Forn	Form OP-REQ1: Page 22					
VI.	I. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)					
	Н.	H. Subpart AAAA - Standards of Performance for Small Municipal Waste Incineration Units for Which Construction Commenced After August 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 6, 2004 (continued)				
*		5.	The application area includes at least one air curtain incinerator constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006. If the response to Question VI.H.5 is "NO," go to Question VI.H.7.	YES	□NO	
*		6.	All air curtain incinerators constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006 combust only yard waste.	□YES	□NO	
*		7.	The application area includes at least one air curtain incinerator constructed before August 30, 1999 and not modified or reconstructed on or after June 6, 2006.	YES	□NO	
♦		8.	All air curtain incinerators constructed before August 30, 1999 and not modified or reconstructed on or after June 6, 2006 combust only yard waste.	□YES	□NO	
	I.	I. Subpart CCCC - Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction Commenced After November 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 1, 2001				
*		1.	The application area includes at least one commercial or industrial solid waste incineration unit, other than an air curtain incinerator. If the response to Question VI.I.1 is "N/A," go to Section VI.J. If the response to Question VI.I.1 is "NO," go to Question VI.I.4.	□YES	⊠NO □N/A	
*		2.	The application area includes at least one commercial or industrial solid waste incineration unit, other than an air curtain incinerator, constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001.	☐YES	□NO	

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VI.	. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)				
	I. Subpart CCCC - Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction Commenced After November 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 1, 2001 (continued)				
*		3.	The application area includes at least one commercial or industrial solid waste incineration unit, other than an air curtain incinerator, constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001.	YES	□NO
*		4.	The application area includes at least one air curtain incinerator. If the response to Question VI.I.4 is "NO," go to Section VI.J.	□YES	⊠NO
*		5.	The application area includes at least one air curtain incinerator, constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001. <i>If the response to Question VI.I.5 is "NO," go to VI.I.7.</i>	YES	□NO
*		6.	All air curtain incinerators constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	YES	□NO
♦		7.	The application area includes at least one air curtain incinerator, constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001.	YES	□NO
*		8.	All air curtain incinerators constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	YES	□NO

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Form OP-REQ1: Page 24						
VI.	Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)					
	J.	Subpart EEEE - Standards of Performance for Other Solid Waste Incineration Units for Which Construction Commenced After December 9, 2004 or for Which Modification or Reconstruction Commenced on or After June 16, 2006				
*		1.	The application area includes at least one very small municipal waste incineration unit or institutional incineration unit, other than an air curtain incinerator. If the response to Question VI.J.1 is "N/A," go to Section VI.K. If the response to Question VI.J.1 is "NO," go to Question VI.J.4.	☐YES	⊠NO □N/A	
*		2.	The application area includes at least one very small municipal waste incineration unit, other than an air curtain incinerator, constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006.	☐YES	□NO	
*		3.	The application area includes at least one very small municipal waste incineration unit, other than an air curtain incinerator, constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006.	YES	□NO	
•		4.	The application area includes at least one air curtain incinerator. If the response to Question VI.J.4 is "NO," go to Section VI.K.	□YES	⊠NO	
*		5.	The application area includes at least one air curtain incinerator constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006. If the response to Question VI.J.5 is "NO," go to Question VI.J.7.	_YES	□NO	
♦		6.	All air curtain incinerators constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	☐YES	□NO	
*		7.	The application area includes at least one air curtain incinerator constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006.	☐YES	□NO	

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Forn	Form OP-REQ1: Page 25				
VI.	Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (NSPS) (continued)				
	J.	Subpart EEEE - Standards of Performance for Other Solid Waste Incineration Units for Which Construction Commenced After December 9, 2004 or for Which Modification or Reconstruction Commenced on or After June 16, 2006 (continued)			
*		8.	All air curtain incinerators constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	□YES	□NO
*		9.	The air curtain incinerator is located at an institutional facility and is a distinct operating unit of the institutional facility that generated the waste.	YES	□NO
*		10.	The air curtain incinerator burns less than 35 tons per day of wood waste, clean lumber, or yard waste or a mixture of these materials.	YES	□NO
	K.		part OOOO - Standards of Performance for Crude Oil and Natural Gas Produ esmission and Distribution	ction,	
*		1.	The application area includes one or more of the onshore affected facilities listed in 40 CFR § 60.5365(a)-(g) that are subject to 40 CFR Part 60, Subpart OOOO.	YES	⊠NO
VII.	Title	40 C	ode of Federal Regulations Part 61 - National Emission Standards for Hazardo	us Air Po	llutants
	A.	Appl	licability		
*		1.	The application area includes a unit(s) that is subject to one or more 40 CFR Part 61 subparts. If the response to Question VII.A.1 is "NO" or "N/A," go to Section VIII.	_YES	⊠NO □N/A
	В.	Subp	part F - National Emission Standard for Vinyl Chloride		
		1.	The application area is located at a plant which produces ethylene dichloride by reaction of oxygen and hydrogen chloride with ethylene, vinyl chloride by any process, and/or one or more polymers containing any fraction of polymerized vinyl chloride.	□YES	□NO
	C.	. Subpart J - National Emission Standard for Benzene Emissions for Equipment Leaks (Fugitive Emission Sources) of Benzene (Complete this section for GOP applications only)			
♦		1.	The application area includes equipment in benzene service.	YES	□NO □N/A

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Form	Form OP-REQ1: Page 26						
VII.		Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)					
	D.	Subp Plan	oduct Recovery				
		1.	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>				
		2.	2. The application area includes equipment in benzene service as determined by 40 CFR § 61.137(b).				
		3.	The application area has elected to comply with the provisions of 40 CFR § 61.243-1 and 40 CFR § 61.243-2.	□YES □NO			
	E. Subpart M - National Emission Standard for Asbestos						
		Appl					
		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.	□YES □NO			
			If the response to Question VII.E.1 is "NO," go to Section VII.F.				
		Road	Iway Construction				
		2.	The application area includes roadways constructed or maintained with asbestos tailings or asbestos-containing waste material.	□YES □NO			
		Man	ufacturing Commercial Asbestos				
		3.	The application area includes a manufacturing operation using commercial asbestos. If the response to Question VII.E.3 is "NO," go to Question VII.E.4.	□YES □NO			
			Visible emissions are discharged to outside air from the manufacturing operation	□YES □NO			
			b. An alternative emission control and waste treatment method is being used that has received prior U.S. Environmental Protection Agency (EPA) approval.	□YES □NO			

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Form	Form OP-REQ1: Page 27					
VII.	II. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)					
	E.	Subp	art M	- National Emission Standard for Asbestos (continued)		
		Manı	ufactu	ring Commercial Asbestos (continued)		
			c.	Asbestos-containing waste material is processed into non-friable forms.	□YES	□NO
			d.	Asbestos-containing waste material is adequately wetted.	□YES	□NO
			e.	Alternative filtering equipment is being used that has received EPA approval.	YES	□NO
			f.	A high efficiency particulate air (HEPA) filter is being used that is certified to be at least 99.97% efficient for 0.3 micron particles	□YES	□NO
			g.	The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.	☐YES	□NO
		Asbes	stos Sp	pray Application		
		4.	are sp	application area includes operations in which asbestos-containing materials bray applied. response to Question VII.E.4 is "NO," go to Question VII.E.5.	☐YES	□NO
			a. If the	Asbestos fibers are encapsulated with a bituminous or resinous binder during spraying and are not friable after drying. response to Question VII.E.4.a is "YES," go to Question VII.E.5.	☐YES	□NO
			b.	Spray-on applications on buildings, structures, pipes, and conduits do not use material containing more than 1% asbestos.	☐YES	□NO
			c.	An alternative emission control and waste treatment method is being used that has received prior EPA approval.	☐YES	□NO

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

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Form	Form OP-REQ1: Page 29						
VII.		tle 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants ontinued)					
	E.	Subj	part M	I - National Emission Standard for Asbestos (continued)			
		Fabr	ricatinį	g Commercial Asbestos (continued)			
			f.	A HEPA filter is being used that is certified to be at least 99.97% efficient for 0.3 micron particles.	☐YES	□NO	
			g.	The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.	□YES	□NO	
		Non	-spraye	ed Asbestos Insulation			
	6. The application area includes insulating materials (other than spray applied insulating materials) that are either molded and friable or wet-applied and friable after drying.				YES	□NO	
		Asbestos Conversion					
		7.	conta	application area includes operations that convert regulated asbestos- aining material and asbestos-containing waste material into nonasbestos estos-free) material.	□YES	□NO	
	F.			- National Emission Standard for Inorganic Arsenic Emissions from Arsenic Production Facilities	senic Trio	xide and	
		1.	arsen	application area is located at a metallic arsenic production plant or at an ic trioxide plant that processes low-grade arsenic bearing materials by a ing condensation process.	YES	□NO	
	G.	Subj	part B	B - National Emission Standard for Benzene Emissions from Benzene Tr	ansfer O	perations	
		1.	termi	application area is located at a benzene production facility and/or bulk inal. expression response to Question VII.G.1 is "NO," go to Section VII.H.	□YES	□NO	
		2.	The a	application area includes benzene transfer operations at marine vessel ng racks.	YES	□NO	

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

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

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Form	Form OP-REQ1: Page 32			
VII.		40 Co	ode of Federal Regulations Part 61 - National Emission Standards for Hazardo	ous Air Pollutants
	н.	Subp	oart FF - National Emission Standard for Benzene Waste Operations (continue	ed)
		Cont	ainer Requirements	
		15.	The application area has containers, as defined in 40 CFR § 61.341, that receive non-exempt benzene waste. If the response to Question VII.H.15 is "NO," go to Question VII.H.18.	□YES □NO
		16.	The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers. If the response to Question VII.H.16 is "YES," go to Question VII.H.18.	□YES □NO
		17.	Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	□YES □NO
		Indiv	vidual Drain Systems	
		18.	The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage non-exempt benzene waste. If the response to Question VII.H.18 is "NO," go to Question VII.H.25.	□YES □NO
		19.	The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. If the response to Question VII.H.19 is "YES," go to Question VII.H.25.	□YES □NO
		20.	The application area has individual drain systems complying with 40 CFR § 61.346(a). If the response to Question VII.H.20 is "NO," go to Question VII.H.22.	□YES □NO
		21.	Covers and closed-vent systems used for individual drain systems operate such that the individual drain system is maintained at a pressure less than atmospheric pressure.	□YES □NO

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Form	ı OP-I	REQ1:	Page 33		
VII.	VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)				
	н.	Subp	oart FF - National Emission Standard for Benzene Waste Operations (continue	ed)	
		Indiv	ridual Drain Systems (continued)		
		22.	The application area has individual drain systems complying with 40 CFR § 61.346(b). If the response to Question VII.H.22 is "NO," go to Question VII.H.25.	□YES □NO	
		23.	Junction boxes in the individual drain systems are equipped with a system to prevent the flow of organic vapors from the junction box vent pipe to the atmosphere during normal operation.	□YES □NO	
		24.	Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device.	□YES □NO	
		Reme	ediation Activities		
		25.	Remediation activities take place at the application area subject to 40 CFR Part 61, Subpart FF.	□YES □NO	
VIII.			ode of Federal Regulations Part 63 - National Emission Standards for Hazardo Categories	ous Air Pollutants	
	A.	Appl	icability		
•		1.	The application area includes a unit(s) that is subject to one or more 40 CFR Part 63 subparts other than subparts made applicable by reference under subparts in 40 CFR Part 60, 61 or 63. See instructions for 40 CFR Part 63 subparts made applicable only by reference.	⊠YES □NO	
	В.		oart F - National Emission Standards for Organic Hazardous Air Pollutants fronic Chemical Manufacturing Industry	om the Synthetic	
		1.	The application area is located at a plant site that is a major source as defined in the Federal Clean Air Act § 112(a). If the response to Question VIII.B.1 is "NO," go to Section VIII.D.	⊠YES □NO	

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

Form OP-	Form OP-REQ1: Page 34			
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)			
В.	3. Subpart F - National Emission Standards for Organic Hazardous Air Pollutants fro Organic Chemical Manufacturing Industry (continued)			ynthetic
	2.	The application area is located at a site that includes at least one chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii). If the response to Question VIII.B.2 is "NO," go to Section VIII.D.	⊠YES	□NO
	3.	The application area is located at a site that includes at least one chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii) and uses as a reactant or manufactures as a product, or co-product, one or more of the organic hazardous air pollutants listed in table 2 of 40 CFR Part 63, Subpart F.	⊠YES	□NO
	4.	The application area includes a chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii) and uses as a reactant or manufactures as a product, or co-product, one or more of the organic hazardous air pollutants listed in table 2 of 40 CFR Part 63, Subpart F.	⊠YES	□NO
	5.	The application area includes a chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii) and does <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>	□YES	⊠NO

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

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Form (Form OP-REQ1: Page 35				
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)				
(C.	Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater			
		Appl	icability		
		1.	The application area is located at a site that is subject to 40 CFR 63, Subpart F and the application area includes process vents, storage vessels, transfer racks, or waste streams associated with a chemical manufacturing process subject to 40 CFR 63, Subpart F. If the response to Question VIII.C.1 is "NO," go to Section VIII.D.	⊠YES	□NO
		2.	The application area includes fixed roofs, covers, and/or enclosures that are required to comply with 40 CFR § 63.148.	⊠YES	□NO
		3.	The application area includes vapor collection systems or closed-vent systems that are required to comply with 40 CFR § 63.148. If the response to Question VIII.C.3 is "NO," go to Question VIII.C.8.	⊠YES	□NO
		4.	The application area includes vapor collection systems or closed-vent systems that are constructed of hard-piping.	⊠YES	□NO
		5.	The application area includes vapor collection systems or closed-vent systems that contain bypass lines that could divert a vent stream away from a control device and to the atmosphere. If the response to Question VIII.C.5 is "NO," go to Question VIII.C.8.	□YES	⊠NO
		Vapo	or Collection and Closed Vent Systems		
		6.	Flow indicators are installed, calibrated, maintained, and operated at the entrances to bypass lines in the application area.	□YES	□NO
		7.	Bypass lines in the application area are secured in the closed position with a carseal or a lock-and-key type configuration.	□YES	□NO

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

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

Form OP-REQ1: Page 37 VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued) C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued) **Process Wastewater Streams (continued)** The application area includes process wastewater streams utilizing the YES NO compliance option specified in 40 CFR § 63.110(f)(4)(ii). 17. The application area includes process wastewater streams that are also subject to ☐YES \boxtimes NO the provisions of 40 CFR Parts 260 through 272. If the response to Question VIII.C.17 is "NO," go to Question VIII.C.20. 18. The application area includes process wastewater streams complying with YES NO 40 CFR § 63.110(e)(2)(i). The application are includes process wastewater streams complying with TYES NO 19. 40 CFR § 63.110(e)(2)(ii). 20. The application area includes process wastewater streams, located at existing ☐YES ⊠NO 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. 21. The application area includes process wastewater streams, located at existing \square YES \square NO sources that are Group 2. 22. The application area includes process wastewater streams, located at new ☐YES ⊠NO 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. 23. The application area includes process wastewater streams, located at new ☐YES ☐NO sources that are Group 2 for both Table 8 and Table 9 compounds.

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

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

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

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Form OP-	REQ1	: Page 41				
		ode of Federal Regulations Part 63 - National Emission Standards for Hazardo e Categories (continued)	ous Air Po	ollutants		
Е.	Subpart O - Ethylene Oxide Emissions Standards for Sterilization Facilities					
	1.	The application area includes sterilization facilities where ethylene oxide is used in the sterilization or fumigation of materials. If the response to Question VIII.E.1 is "NO," go to Section VIII.F.	YES	⊠NO		
	2.	Sterilization facilities located in the application area are subject to 40 CFR Part 63, Subpart O. If the response to Question VIII.E.2 is "NO," go to Section VIII.F.	YES	□NO		
	3.	The sterilization source has used less than 1 ton (907 kg) of ethylene oxide within all consecutive 12-month periods after December 6, 1996.	□YES	□NO		
	4.	The sterilization source has used less than 10 tons (9070 kg) of ethylene oxide within all consecutive 12-month periods after December 6, 1996.	□YES	□NO		
F.	Subj	part Q - National Emission Standards for Industrial Process Cooling Towers				
	1.	The application area includes industrial process cooling towers. If the response to Question VIII.F.1 is "NO," go to Section VIII.G.	⊠YES	□NO		
	2.	Chromium-based water treatment chemicals have been used on or after September 8, 1994.	□YES	⊠NO		
G.	-	part R - National Emission Standards for Gasoline Distribution Facilities (Bullminals and Pipeline Breakout Stations)	k Gasolin	e		
	1.	The application area includes a bulk gasoline terminal.	□YES	\boxtimes NO		
	2.	The application area includes a pipeline breakout station. If the responses to Questions VIII.G.1 and VIII.G.2 are both "NO," go to Section VIII.H.	□YES	⊠NO		
	3.	The bulk gasoline terminal or pipeline breakout station is located within a contiguous area and under common control with another bulk gasoline terminal or a pipeline breakout station. If the response to Ouestion VIII.G.3 is "YES," go to Ouestion VIII.G.10.	□YES	□NO		

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

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

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Form	Form OP-REQ1: Page 44					
VIII.	7III. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)					
	I.					
		1.	The application area includes an individual batch vapor, in-line vapor, in-line cold, and/or batch cold solvent cleaning machine that uses a hazardous air pollutant (HAP) solvent, or any combination of halogenated HAP solvents, in a total concentration greater than 5% by weight, as a cleaning and/or drying agent.	□YES	⊠NO	
		2.	The application area is located at a major source and includes solvent cleaning machines, qualifying as affected facilities, that use perchloroethylene, trichloroethylene or methylene chloride.	☐YES	⊠NO	
		3.	The application area is located at an area source and includes solvent cleaning machines, other than cold batch cleaning machines, that use perchloroethylene, trichloroethylene or methylene chloride.	□YES	⊠NO	
	J.	_	art U - National Emission Standards for Hazardous Air Pollutant Emissions: Resins	Group 1	Polymers	
		1.	The application area includes elastomer product process units and/or wastewater streams and wastewater operations that are associated with elastomer product process units. If the response to Question VIII.J.1 is "NO," go to Section VIII.K.	□YES	⊠NO	
		2.	Elastomer product process units and/or wastewater streams and wastewater operations located in the application area are subject to 40 CFR Part 63, Subpart U. If the response to Question VIII.J.2 is "NO," go to Section VIII.K.	□YES	□NO	
		3.	The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 for organic HAPs as defined in 40 CFR § 63.482.	☐YES	□NO	
		4.	The application area includes process wastewater streams that are Group 2 for organic HAPs as defined in 40 CFR § 63.482.	□YES	□NO	

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Forn	ı OP-l	REQ1:	Page 45			
VIII.	III. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)					
	J.	Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Po and Resins (continued)				
		5.	All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. If the response to Question VIII.J.5 is "YES," go to Question VIII.J.15.	□YES	□NO	
		6.	The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.J.6 is "NO," go to Question VIII.J.8.</i>	□YES	□NO	
		7.	The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	□YES	□NO	
		8.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	□YES	□NO	
		9.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. If the responses to Questions VIII.J.8 - VIII.J.9 are both "NO," go to Question VIII.J.11.	□YES	□NO	
		10.	The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	□YES	□NO	

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

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

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VIII.		Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)				
	L.	Subpart X - National Emission Standards for Hazardous Air Pollutants from Secondary Lead Smelting				
		1.	The application area includes one or more of the affected sources in 40 CFR § 63.541(a) that are located at a secondary lead smelter. If the response to Question VIII.L.1 is "NO" or "N/A," go to Section VIII.M.	□YES	⊠NO □N/A	
		2.	The application area is using and approved alternate to the requirements of § 63.545(c)(1)-(5) for control of fugitive dust emission sources.	□YES	□NO	
	M.	Subj	part Y - National Emission Standards for Marine Tank Vessel Loading Operat	ions		
		1.	The application area includes marine tank vessel loading operations that are specified in 40 CFR § 63.560 and located at an affected source as defined in 40 CFR § 63.561.	☐YES	⊠NO	
	N.	Subj	part CC - National Emission Standards for Hazardous Air Pollutants from Pet	roleum R	efineries	
		Appl	icability			
		1.	The application area includes petroleum refining process units and/or related emission points that are specified in 40 CFR § 63.640(c)(1) - (c)(7). If the response to Question VIII.N.1 is "NO," go to Section VIII.O.	☐YES	⊠NO	
		2.	All petroleum refining process units/and or related emission points within the application area are specified in 40 CFR § 63.640(g)(1) - (g)(7). If the response to Question VIII.N.2 is "YES," go to Section VIII.O.	☐YES	□NO	

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

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

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

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

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

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Form	Form OP-REQ1: Page 54					
VIII.	II. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)					
	Q.	_	oart - HH - National Emission Standards for Hazardous Air Pollutants From (uction Facilities (continued)	oil and Na	atural Gas	
•		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 ft³) per day and a facility-wide actual annual average hydrocarbon liquid throughput less than 39,700 liters (10,487.6 gallons) per day. For SOP applications, if the response to Question VIII.Q.5 is "YES," go to Section VIII.R. For GOP applications, if the response to Question VIII.Q.5 is "YES," go to Section VIII.Z. For all applications, if the response to Question VIII.Q.5 is "NO," go to Question VIII.Q.9.	YES	□NO	
•		6.	The application area includes a triethylene glycol (TEG) dehydration unit. For SOP applications, f the answer to Question VIII.Q.6 is "NO," go to Section VIII.R. For GOP applications, if the response to Question VIII.Q.6 is "NO," go to Section VIII.Z.	☐YES	□NO	
*		7.	The application area is located at a site that is within the boundaries of UA plus offset or a UC, as defined in 40 CFR § 63.761.	□YES	□NO	
•		8.	The site has actual emissions of 5 tons per year or more of a single HAP, or 12.5 tons per year or more of a combination of HAP.	□YES	□NO	
*		9.	Emissions for major source determination are being estimated based on the maximum natural gas or hydrocarbon liquid throughput as calculated in § 63.760(a)(1)(i)-(iii).	☐YES	□NO	

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

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

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Form OP-	Form OP-REQ1: Page 57				
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)				
W.		part YY - National Emission Standards for Hazardous Air Pollutants for Sourceric Maximum Achievable Control Technology Standards (continued)	ce Catego	ries -	
	7.	The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	YES	□NO	
	8.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	□YES	□NO	
	9.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. If the responses to Questions VIII.W.8 and W.9 are both "NO," go to Question VIII.W.11.	□YES	□NO	
	10.	The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	□YES	□NO	
	11.	The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	YES	□NO	
	12.	The application area includes individual drain systems that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. If the response to Question VIII.W.12 is "NO," go to Question VIII.W.15.	□YES	□NO	
	13.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of covers and, if vented, closed vent systems and control devices.	□YES	□NO	
	14.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	☐YES	□NO	

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

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

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Form (Form OP-REQ1: Page 60			
		10 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous urce Categories (continued)	s Air Po	llutants
\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \		Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Generic Maximum Achievable Control Technology Standards (continued)	Categor	ries -
	2	25. The total annual benzene quantity from waste at the site is less than 10 Mg/yr as determined according to 40 CFR § 61.342(a).]YES	□NO
	2	26. The application area contains at least one waste stream that is a continuous butadiene waste stream as defined in 40 CFR § 63.1082(b). If the response to Question VIII.W.26 is "NO," go to Question VIII.W.43.	YES	□NO
	2	27. The waste stream(s) contains at least 10 ppmw 1, 3-butadiene at a flow rate of 0.02 liters per minute or is designated for control. If the response to Question VIII.W.27 is "NO," go to Question VIII.W.43.]YES	□NO
	2	28. The control requirements of 40 CFR Part 63, Subpart G for process wastewater as specified in 40 CFR § 63.1095(a)(2) are selected for control of the waste stream(s). If the response to Question VIII.W.28 is "NO," go to Question VIII.W.33.	YES	□NO
	2	29. The application area includes containers that receive, manage, or treat a continuous butadiene waste stream.]YES	□NO
	3	30. The application area includes individual drain systems that receive, manage, or treat a continuous butadiene waste stream. If the response to Question VIII.W.30 is "NO," go to Question VIII.W.43.	YES	□NO
	3	31. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	YES	□NO

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

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

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		de of Federal Regulations Part 63 - National Emission Standards for Hazardo Categories (continued)	ous Air Po	ollutants
W.		eart YY - National Emission Standards for Hazardous Air Pollutants for Source ric Maximum Achievable Control Technology Standards (continued)	ce Catego	ries -
	46.	Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	□YES	□NO
	47.	The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage a waste stream containing benzene. If the response to Question VIII.W.47 is "NO," go to Question VIII.W.54.	☐YES	□NO
	48.	The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. If the response to Question VIII.W.48 is "YES," go to Question VIII.W.54.	YES	□NO
	49.	The application area has individual drain systems complying with 40 CFR § 61.346(a). If the response to Question VIII.W.49 is "NO," go to Question VIII.W.51.	☐YES	□NO
	50.	Covers and closed-vent systems used for individual drain systems operate such that the individual drain system is maintained at a pressure less than atmospheric pressure.	☐YES	□NO
	51.	The application area has individual drain systems complying with 40 CFR § 61.346(b). If the response to Question VIII.W.51 is "NO," go to Question VIII.W.54.	YES	□NO
	52.	Junction boxes in the individual drain systems are equipped with a system to prevent the flow of organic vapors from the junction box vent pipe to the atmosphere during normal operation.	☐YES	□NO

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

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

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Form OP-1	REQ1:	Page 66		
		ode of Federal Regulations Part 63 - National Emission Standards for Hazardo Categories (continued)	ous Air Po	llutants
Х.	Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins (continued)			
	13.	The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	□YES	□NO
	Cont	ainers		
	14.	The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	YES	□NO
	Drains			
	15.	The application area includes individual drain systems that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. If the response to Question VIII.X.15 is "NO," go to Question VIII.X.18.	□YES	□NO
	16.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	□YES	□NO
	17.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	☐YES	□NO
	18.	The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of an thermoplastic product process unit. If the response to Question VIII.X.18 is "NO," go to Section VIII.Y.	□YES	□NO

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Form OP-	REQ1:	Page 67		
		ode of Federal Regulations Part 63 - National Emission Standards for Hazardo Categories (continued)	us Air Po	ollutants
X.	Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins (continued)			
	Drain	ns (continued)		
	19.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that meet the criteria listed in 40 CFR § 63.149(d) and § 63.1330(b)(12). <i>If the response to Question VIII.X.19 is "NO," go to Section VIII.Y.</i>	□YES	□NO
	20.	The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.1312, at any flow rate.	□YES	□NO
	21.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.1312, at an annual average flow rate greater than or equal to 10 liters per minute.	□YES	□NO
	22.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of an thermoplastic product process unit that is a new affected source or part of a new affected source and the equipment conveys water with a total annual average concentration greater than or equal to 10 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.1312, at an average annual flow rate greater than or equal to 0.02 liter per minute	□YES	□NO

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

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Form OP-REQ1: Page 69					
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)				
A	AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Misc Organic Chemical Production and Processes (MON) (continued)				
	 5. The application area includes process wastewater streams. If the response to Question VIII.AA.5 is "NO," go to Question VIII.AA.18. 6. The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 for compounds listed in Table 8 of 40 CFR Part 63, Subpart G or Table 8 and Table 9, as appropriate, of 40 CFR Part 63, Subpart FFFF. 		□YES □NO		
			□YES □NO		
	The application area includes process wastewater streams that are Group 2 for compounds listed in Table 8 or Table 8 and Table 9, as appropriate, of 40 CFR Part 63, Subpart FFFF.	□YES □NO			
	8.	All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. If the response to Question VIII.AA.8 is "YES," go to Section VIII.AA.22.	□YES □NO		
	9.	The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. If the response to Question VIII.AA.9 is "NO," go to Question VIII.AA.11.	□YES □NO		
	10.	The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	□YES □NO		
	11.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	□YES □NO		
	12.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. If the responses to Questions VIII.AA.11 and VIII.AA.12 are both "NO," go to Question VIII.AA.18.	□YES □NO		

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

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

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

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

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

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Forn	Form OP-REQ1: Page 75					
VIII	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)					
	EE.	Subpart BBBBB - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities (continued)				
		11.	The bulk gasoline terminal loads gasoline into railcar cargo tanks which collect vapors from a vapor balance system and that system complies with a Federal, State, local, tribal rule or permit.	□YES	□NO	
	FF.		part CCCCCC - National Emission Standards for Hazardous Air Pollutants fo bline Dispensing Facilities	r Source	Category:	
*		1.	The application area is located at a site that is an area source of hazardous air pollutants. If the answer to Question VIII.FF.1 is "NO," go to Section VIII.GG.	YES	⊠NO	
*		2.	The application area includes at least one gasoline dispensing facility as defined in 40 CFR § 63.11132. If the answer to Question VIII.FF.2 is "NO," go to Section VIII.GG.	□YES	□NO	
*		3.	The application area includes at least one gasoline dispensing facility with a monthly throughput of less than 10,000 gallons.	□YES	□NO	
•		4.	The application area includes at least one gasoline dispensing facility where gasoline is dispensed from a fixed gasoline storage tank into a portable gasoline tank for the on-site delivery and subsequent dispensing into other gasoline-fueled equipment.	□YES	□NO	
	GG.	Rece	ently Promulgated 40 CFR Part 63 Subparts			
*		1.	The application area is subject to one or more promulgated 40 CFR Part 63 subparts not addressed on this form. If the response to Question VIII.GG.1 is "NO," go to Section IX. A list of promulgated 40 CFR Part 63 subparts not otherwise addressed on OP-REQ1 is included in the instructions.	YES	⊠NO	
*		2.	Provide the Subpart designation (i.e. Subpart EEE) in the space provided below.			

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Forn	Form OP-REQ1: Page 76						
IX.	Title	itle 40 Code of Federal Regulations Part 68 (40 CFR Part 68) - Chemical Accident Prevention Provisions					
	Α.	Appl	Applicability				
•		1.	The application area contains processes subject to 40 CFR Part 68, Chemical Accident Prevention Provisions, and specified in 40 CFR § 68.10.	∑YES	□NO		
X.	Title	40 Co	ode of Federal Regulations Part 82 (40 CFR Part 82) - Protection of Stratosphe	eric Ozon	e		
	A.	Subp	part A - Production and Consumption Controls				
•		1.	The application area is located at a site that produces, transforms, destroys, imports, or exports a controlled substance or product.	□YES	⊠NO □N/A		
	В.	Subp	oart B - Servicing of Motor Vehicle Air Conditioners				
*		1.	Servicing, maintenance, and/or repair of fleet vehicle air conditioning systems using ozone-depleting refrigerants is conducted in the application area.	☐YES	⊠NO		
	C.	_	part C - Ban on Nonessential Products Containing Class I Substances and Ban lucts Containing or Manufactured with Class II Substances	on Nones	sential		
*		1.	The application area sells or distributes one or more nonessential products (which release a Class I or Class II substance) that are subject to 40 CFR Part 82, Subpart C.	□YES	⊠NO □N/A		
	D.	Subp	oart D - Federal Procurement				
•		1.	The application area is owned/operated by a department, agency, or instrumentality of the United States.	□YES	⊠NO □N/A		
	E.	Subp	part E - The Labeling of Products Using Ozone Depleting Substances				
*		1.	The application area includes containers in which a Class I or Class II substance is stored or transported prior to the sale of the Class I or Class II substance to the ultimate consumer.	☐YES	⊠NO □N/A		
•		2.	The application area is a manufacturer, importer, wholesaler, distributor, or retailer of products containing a Class I or Class II substance.	□YES	⊠NO □N/A		
*		3.	The application area is a manufacturer, importer, wholesaler, distributor, or retailer of products manufactured with a process that uses a Class I or Class II substance.	☐YES	⊠NO □N/A		

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Forn	Form OP-REQ1: Page 77					
X.		e 40 Co tinued	ode of Federal Regulations Part 82 (40 CFR Part 82) - Protection of Stratosphol)	eric Ozon	e	
	F.	Subpart F - Recycling and Emissions Reduction				
*		1.	Servicing, maintenance, and/or repair on refrigeration and non-motor vehicle air condition appliances using ozone-depleting refrigerants or non-exempt substitutes is conducted in the application area.	⊠YES	□NO	
*		2.	Disposal of appliances (including motor vehicle air conditioners) or refrigerant or non-exempt substitute reclamation occurs in the application area.	□YES	⊠NO □N/A	
*		3.	The application area manufactures appliances or refrigerant recycling and recovery equipment.	□YES	⊠NO □N/A	
	G.	Subj	part G - Significant New Alternatives Policy Program			
•		1.	The application area manufactures, formulates, or creates chemicals, product substitutes, or alternative manufacturing processes that are intended for use as a replacement for a Class I or Class II compound. If the response to Question X.G.1 is "NO" or "N/A," go to Section X.H.	□YES	⊠NO □N/A	
*		2.	All substitutes produced by the application area meet one or more of the exemptions in 40 CFR § 82.176(b)(1) - (7).	□YES	□NO □N/A	
	H.	Subj	part H -Halon Emissions Reduction			
*		1.	Testing, servicing, maintaining, repairing, or disposing of equipment containing halons is conducted in the application area.	□YES	⊠NO □N/A	
*		2.	Disposal of halons or manufacturing of halon blends is conducted in the application area.	□YES	□NO □N/A	
XI.	Miso	cellane	eous			
	A.	Requ	uirements Reference Tables (RRT) and Flowcharts			
		1.	The application area contains units that are potentially subject to a regulation for which the TCEQ has not developed an RRT and flowchart.	□YES	⊠NO	

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Forn	orm OP-REQ1: Page 78					
XI.	Misc	ellane	ous (continued)			
	B.	Forms				
*		1.	The application area contains units that are potentially subject to a regulation for which the TCEQ has not developed a unit attribute form. If the response to Question XI.B.1 is "NO" or "N/A," go to Section XI.C.	YES	⊠NO □N/A	
*		2.	Provide the Part and Subpart designation for the federal rule(s) or the Chapter, Sul Division designation for the State regulation(s) in the space provided below.	ochapter,	and	
	C.	Emis	sion Limitation Certifications			
*		1.	The application area includes units for which federally enforceable emission limitations have been established by certification.	□YES	⊠NO	
	D.	Alternative Means of Control, Alternative Emission Limitation or Standard, or Equivalent Requirements				
		1.	The application area is located at a site that is subject to a site-specific requirement of the state implementation plan (SIP).	YES	⊠NO	
		2.	The application area includes units located at the site that are subject to a site-specific requirement of the SIP.	YES	⊠NO	
		3.	The application area includes units which demonstrate compliance by using an alternative means of control, alternative emission limitation or standard or equivalent requirements approved by the EPA Administrator. If the response to Question XI.D.3 is "YES," please include a copy of the approval document with the application.	☐YES	⊠NO	
		4.	The application area includes units which demonstrate compliance by using an alternative means of control, alternative emission limitation or standard or equivalent requirements approved by the TCEQ Executive Director. If the response to Question XI.D.4 is "YES," please include a copy of the approval document with the application.	□YES	⊠NO	

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Forn	Form OP-REQ1: Page 79					
XI.	Miso	cellaneous (continued)				
	E.	Title				
		1.	The application area includes emission units subject to the Acid Rain Program (ARP), including the Opt-In Program.	□YES	⊠NO	
		2.	The application area includes emission units qualifying for the new unit exemption under 40 CFR § 72.7.	□YES	⊠NO	
		3.	The application area includes emission units qualifying for the retired unit exemption under 40 CFR § 72.8.	YES	⊠NO	
	F.		FR Part 97, Subpart EEEEE - Cross-State Air Pollution Rule (CSAPR) NO_X op 2 Trading Program	Ozone Sea	son	
		1.	The application area includes emission units subject to the requirements of the CSAPR NO _X Ozone Season Group 2 Trading Program. If the response to Question XI.F.1 is "NO," go to Question XI.F.7.	YES	⊠NO	
		2.	The application area includes units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart H for NO _X and heat input.	□YES	□NO	
		3.	The application area includes gas or oil-fired units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart H for NO _x , and the monitoring requirements of 40 CFR Part 75, Appendix D for heat input.	□YES	□NO	
		4.	The application area includes gas or oil-fired peaking units that are complying with the monitoring requirements of 40 CFR Part 75, Appendix E for NO _X , and the monitoring requirements of 40 CFR Part 75, Appendix D for heat input.	□YES	□NO	
		5.	The application area includes gas or oil-fired units that are complying with the Low Mass Emissions monitoring requirements of 40 CFR § 75.19 for NO _X and heat input.	□YES	□NO	
		6.	The application area includes units that are complying with EPA-approved alternative monitoring system requirements of 40 CFR Part 75, Subpart E for NO _X and heat input.	☐YES	□NO	
		7.	The application area includes emission units that qualify for the CSAPR NO _X Ozone Season Group 2 retired unit exemption.	□YES	⊠NO	

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Forn	Form OP-REQ1: Page 80					
XI.	Misc	ellane	ous (continued)			
	G.	40 C	FR Part 97, Subpart FFFFF - Texas SO ₂ Trading Program			
		1.	The application area includes emission units complying with the requirements of the Texas SO ₂ Trading Program. If the response to Overtion VI.C. Lie "NO." so to Overtion VI.C. 6	□YES	⊠NO	
		2.	If the response to Question XI.G.1 is "NO," go to Question XI.G.6. The application area includes units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart B for SO ₂ and 40 CFR Part 75, Subpart H for heat input.	□YES	□NO	
		3.	The application area includes gas or oil-fired units that are complying with the monitoring requirements of 40 CFR Part 75, Appendix D for SO ₂ and heat input.	☐YES	□NO	
		4.	The application area includes gas or oil-fired units that are complying with the Low Mass Emissions monitoring requirements of 40 CFR § 75.19 for SO ₂ and heat input.	□YES	□NO	
		5.	The application area includes units that are complying with EPA-approved alternative monitoring system requirements of 40 CFR Part 75, Subpart E for SO ₂ and heat input.	☐YES	□NO	
		6.	The application area includes emission units that qualify for the Texas SO ₂ Trading Program retired unit exemption.	☐YES	⊠NO	
	H. Permit Shield (SOP Applicants Only)					
		1.	A permit shield for negative applicability entries on Form OP-REQ2 (Negative Applicable Requirement Determinations) is being requested or already exists in the permit.	⊠YES	□NO	

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

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

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

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

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Form	Form OP-REQ1: Page 85					
XII.	New	Sourc	ee Review (NSR) Authorizations (continued)			
	B.	Air (
♦		1.	The application area includes at least one Air Quality Standard Permit NSR authorization.	□YES	⊠NO	
			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.			
*		2.	The application area includes at least one "State Pollution Control Project" Air Quality Standard Permit NSR authorization under 30 TAC § 116.617.	□YES	□NO	
♦		3.	The application area includes at least one non-rule Air Quality Standard Permit for Pollution Control Projects NSR authorization.	□YES	□NO	
•		4.	The application area includes at least one "Installation and/or Modification of Oil and Gas Facilities" Air Quality Standard Permit NSR authorization under 30 TAC § 116.620.	□YES	□NO	
♦		5.	The application area includes at least one non-rule Air Quality Standard Permit for Oil and Gas Handling and Production Facilities NSR authorization.	□YES	□NO	
♦		6.	The application area includes at least one "Municipal Solid Waste Landfill" Air Quality Standard Permit NSR authorization under 30 TAC § 116.621.	□YES	□NO	
*		7.	The application area includes at least one "Municipal Solid Waste Landfill Facilities and Transfer Stations" Standard Permit authorization under 30 TAC Chapter 330, Subchapter U.	□YES	□NO	
		8.	The application area includes at least one "Concrete Batch Plant" Air Quality Standard Permit NSR authorization.	□YES	□NO	
♦		9.	The application area includes at least one "Concrete Batch Plant with Enhanced Controls" Air Quality Standard Permit NSR authorization.	□YES	□NO	
*		10.	The application area includes at least one "Hot Mix Asphalt Plant" Air Quality Standard Permit NSR authorization.	☐YES	□NO	

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For SOP applications, answer ALL questions unless otherwise directed.

Forn	orm OP-REQ1: Page 86										
XII.	New	Sourc	ee Review (NSR) Authorizations (continued)								
	В.	Air (Air Quality Standard Permits (continued)								
*		11.	The application area includes at least one "Rock Crusher" Air Quality Standard Permit NSR authorization.	□YES	□NO						
*		12.	The application area includes at least one "Electric Generating Unit" Air Quality Standard Permit NSR authorization. If the response to XII.B.12 is "NO," go to Question XII.B.15.	YES	□NO						
*		13.	For purposes of "Electric Generating Unit" Air Quality Standard Permit, the application area is located in the East Texas Region.	□YES	□NO						
*		14.	For purposes of "Electric Generating Unit" Air Quality Standard Permit, the application area is located in the West Texas Region.	□YES	□NO						
*		15.	The application area includes at least one "Boiler" Air Quality Standard Permit NSR authorization.	□YES	□NO						
*		16.	The application area includes at least one "Sawmill" Air Quality Standard Permit NSR authorization.	□YES	□NO						
	C.	Flexi	ble Permits								
		1.	The application area includes at least one Flexible Permit NSR authorization.	YES	⊠NO						
	D.	Mult	tiple Plant Permits								
		1.	The application area includes at least one Multi-Plant Permit NSR authorization.	□YES	⊠NO						

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Form OP-REQ1: Page 87						
XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)						
E. PSD Permits and PSD Major Pollutants						
PSD Permit No.:	Issuance Date:		Pollutant(s):			
PSD Permit No.:	Issuance Date:		Pollutant(s):			
PSD Permit No.:	Issuance Date:		Pollutant(s):			
PSD Permit No.:	Issuance Date:		Pollutant(s):			
If PSD Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html .						
F. Nonattainment ((NA) Permits and NA Major	Pollutan	its			
NA Permit No.:	Issuance Date:		Pollutant(s):			
NA Permit No.:	Issuance Date:		Pollutant(s):			
NA Permit No.:	Issuance Date:	Issuance Date:		Pollutant(s):		
NA Permit No.:	Issuance Date:	Issuance Date:		Pollutant(s):		
If NA Permits are held for the Technical Forms heading at:		-	•			
G. NSR Authorizat	ions with FCAA § 112(g) Re	equiremen	nts			
NSR Permit No.: 18738	Issuance Date: 01/21/2016	NSR Pe	rmit No.:	Issuance Date:		
NSR Permit No.:	Issuance Date:	NSR Per	rmit No.:	Issuance Date:		
NSR Permit No.:	Issuance Date:	NSR Per	rmit No.:	Issuance Date:		
NSR Permit No.:	Issuance Date:	NSR Per	SR Permit No.: Issuance Date:			
♦ H. Title 30 TAC Chapter 116 Permits, Special Permits, Standard Permits, Other Authorizations (Other Than Permits By Rule, PSD Permits, NA Permits) for the Application Area						
Authorization No.:	Issuance Date:	Authoriz	zation No.:	Issuance Date:		
Authorization No.:	Issuance Date:	ce Date: Authori		Issuance Date:		
Authorization No.:	Issuance Date:	Authoriz	zation No.:	Issuance Date:		
Authorization No.:	Issuance Date:	Authoriz	zation No.:	Issuance Date:		

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Form OP-REQ1: Page 88						
XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)						
♦ I. Permits by Rule (30 TA	C Chapter 106) for the Application Area					
	A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.					
PBR No.: 106.122	Version No./Date: September 4, 2000					
PBR No.: 106.261	Version No./Date: November 1, 2003					
PBR No.: 106.262	Version No./Date: November 1, 2003					
PBR No.: 106.412	Version No./Date: September 4, 2000					
PBR No.: 106.472	Version No./Date: September 4, 2000					
PBR No.: 106.473	Version No./Date: September 4, 2000					
PBR No.: 106.476	Version No./Date: September 4, 2000					
PBR No.: 80	Version No./Date: February 26, 1992					
PBR No.: 106	Version No./Date: January 31, 1994					
PBR No.: 106	Version No./Date: September 12, 1996					
PBR No.: 106	Version No./Date: October 8, 1996					
PBR No.: 118	Version No./Date: February 26, 1992					
PBR No.:	Version No./Date:					
PBR No.:	Version No./Date:					
PBR No.:	Version No./Date:					
PBR No.:	Version No./Date:					
♦ J. Municipal Solid Waste a	and Industrial Hazardous Waste Permits With an Air Addendum					
Permit No.:	Issuance Date:					
Permit No.:	Issuance Date:					
Permit No.:	Issuance Date:					
Permit No.:	Issuance Date:					

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

Date	Permit No.	Regulated Entity No.
11/30/2023	01942	RN102590775

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
		AE40600	OP-UA15 OP-REQ2 OP-REQ3	40 CFR Part 63, Subpart F	40 CFR 63.107	Vent is not a process vent subject to MACT F by definition under this subpart, because the gas stream does not have the characteristics specified in paragraphs (b) through (h) of this section, or meets the criteria specified in paragraph (i) of this section.
		AE40601	OP-UA15 OP-REQ2 OP-REQ3	40 CFR Part 63, Subpart F	40 CFR 63.107	Vent is not a process vent subject to MACT F by definition under this subpart, because the gas stream does not have the characteristics specified in paragraphs (b) through (h) of this section, or meets the criteria specified in paragraph (i) of this section.
		BPA4	OP-UA15	40 CFR Part 60, Subpart NNN	40 CFR 63.110(d)(4)	Compliance with MACT G deemed compliance with NSPS NNN. The owner or operator may elect to apply this subpart to all such equipment in the chemical manufacturing process unit.
		BPA4	OP-UA15	40 CFR Part 60, Subpart RRR	40 CFR 63.110(d)(7)	Compliance with MACT G deemed compliance with NSPS RRR. The owner or operator may elect to apply this subpart to all such equipment in the chemical manufacturing process unit.

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
		BPA-SULF	OP-REQ2	30 TAC Chapter 115	30 TAC Chapter 115.110(a)	Does not store VOCs.
		BPA-SULF	OP-REQ2	40 CFR 60 Subpart Kb	40 CFR 60.110b(a)	Does not store VOCs.
		OP-REQ2	40 CFR Part 63, Subpart F	40 CFR 63.100(b)(2)	Does not store HAPs.	
		CAT-UNLOAD	OP-UA4 OP-REQ2 OP-REQ3	40 CFR Part 63, Subpart F	40 CFR 63.101(b)	Unit is not a transfer rack by definition under MACT F because the unit is unloading only and does not transfer organic HAPs listed in Table 2 of this subpart.
		CWT14	OP-REQ2	40 CFR Part 63, Subpart Q	40 CFR 63.400(a)	No Chromium based cooling tower chemical used after September 8, 1994.
		DIESLTK	OP-REQ2	30 TAC Chapter 115	30 TAC Chapter 115.111(a)(8)	Storage capacity is less than 1,000 gallons.
		DIESLTK	OP-REQ2	40 CFR 60 Subpart Kb	40 CFR 60.110b(a)	Storage capacity is less than 75 m3.
		DIESLTK	OP-REQ2	40 CFR Part 63, Subpart F	40 CFR 63.101(b)	Tank is not a storage vessel by definition under MACT F because the capacity of the tank is less than 38 cubic meters (10,000 gallons).
		GASTK	OP-REQ2	30 TAC Chapter 115	30 TAC Chapter 115.111(a)(8)	Storage capacity is less than 1,000 gallons.
		GASTK	OP-REQ2	40 CFR 60 Subpart Kb	40 CFR 60.110b(a)	Storage capacity is less than 75 m3.
		GASTK	OP-REQ2	40 CFR Part 63, Subpart F	40 CFR 63.101(b)	Tank is not a storage vessel by definition under MACT F because the capacity of the tank is less than 38 cubic meters (10,000 gallons).

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
		MSHLOAD_UN	OP-UA4 OP-REQ2 OP-REQ3	40 CFR Part 63, Subpart F	40 CFR 63.101(b)	Unit is not a transfer rack by definition under MACT F because the unit does not transfer organic HAPs listed in Table 2 of this subpart.
		T147	OP-UA3	40 CFR Part 60, Subpart K	40 CFR 60.110(a)	Storage capacity is less than 40,000 gallons.
		T147	OP-UA3	40 CFR Part 63, Subpart F	40 CFR 63.101(b)	Tank is not a storage vessel by definition under MACT F because the capacity of the tank is less than 38 cubic meters (10,000 gallons).
		T1850	OP-REQ2	30 TAC Chapter 115	30 TAC Chapter 115.111(a)(8)	Storage capacity is less than 1,000 gallons.
		T1850	OP-REQ2	40 CFR 60 Subpart Kb	40 CFR 60.110b(a)	Storage capacity is less than 75 m3.
		T1850	OP-REQ2	40 CFR Part 63, Subpart F	40 CFR 63.100(b)(2)	Does not store HAPs.
		T18507	OP-REQ2	30 TAC Chapter 115	30 TAC Chapter 115.110(a)	Does not store VOCs.
		T18507	OP-REQ2	40 CFR 60 Subpart K	40 CFR 60.110(a)	Tank does not store petroleum liquid.
		T18507	OP-REQ2	40 CFR Part 63, Subpart F	40 CFR 63.100(b)(2)	Does not store HAPs.
		T18508	OP-UA3	40 CFR 60 Subpart K	40 CFR 60.110(a)	Tank does not store petroleum liquids.
		T18509	OP-UA3 OP-REQ2 OP-REQ3	40 CFR 60 Subpart K	40 CFR 60.110(a)	Tank does not store petroleum liquid.
		T1851B	OP-REQ2	30 TAC Chapter 115	30 TAC Chapter 115.110(a)	Does not store VOCs.
		T1851B	OP-REQ2	40 CFR 60 Subpart Kb	40 CFR 60.110b(a)	Does not store VOCs.
		T1851B	OP-REQ2	40 CFR Part 63, Subpart F	40 CFR 63.100(b)(2)	Does not store HAPs.

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
		T18520	OP-REQ2	30 TAC Chapter 115	30 TAC Chapter 115.110(a)	Storage capacity is less than 1,000 gallons
		T18520	OP-REQ2	40 CFR 60 Subpart Kb	40 CFR 60.110b(a)	Storage capacity is less than 75 m3.
		T18520	OP-REQ2	40 CFR Part 63, Subpart F	40 CFR 63.100(b)(2)	Does not store HAPs.
		T18521	OP-REQ2	40 CFR 60 Subpart Kb	40 CFR 60.110b(b)	Storage capacity is greater than 75 m3 but less than 151 m3 and tank stores a liquid with a maximum true vapor pressure less than 15.0 kPa.
		T1857	OP-UA3 OP-REQ2	40 CFR Part 60, Subpart K	40 CFR 60.110(a)	Storage capacity is less than 40,000 gallons.
		T1857	OP-UA3 OP-REQ2	40 CFR Part 63, Subpart F	40 CFR 63.101(b)	Tank is not a storage vessel by definition under MACT F because the capacity of the tank is less than 38 cubic meters (10,000 gallons).
		T20100	OP-UA3	40 CFR Part 60, Subpart Kb	40 CFR 60.110b(1)	A Group I or II storage vessel that is also subject to the provisions of 40 CFR Part 60, Subpart Kb is required only to comply with the provisions of 40 CFR Part 63, Subpart G.
		T20601	OP-UA3 OP-REQ2 OP-REQ3	40 CFR Part 60, Subpart Kb	40 CFR 60.110b(b)	Storage capacity is greater than 75 m3 but less than 151 m3 and tank stores a liquid with a maximum true vapor pressure less than 15.0 kPa.
		T20801	OP-UA3 OP-REQ2 OP-REQ3	40 CFR Part 60, Subpart Kb	40 CFR 60.110b(b)	Storage capacity is greater than 151 m3 and the storing liquid has a maximum true vapor pressure less than 3.5 kilopascals (kPa).

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
		T20802	OP-UA3 OP-REQ2 OP-REQ3	40 CFR Part 60, Subpart Kb	40 CFR 60.110b(b)	Storage capacity is greater than 151 m3 and the storing liquid has a maximum true vapor pressure less than 3.5 kilopascals (kPa).
		T20907	OP-REQ2	30 TAC Chapter 115	30 TAC Chapter 115.111(a)(8)	Storage capacity is less than 1,000 gallons.
		T20907	OP-REQ2	40 CFR Part 60, Subpart Kb	40 CFR 60.110(a)	Storage capacity is less than 75 m3.
		T20907	OP-REQ2	40 CFR Part 63, Subpart F	40 CFR 63.100(b)(2)	Does not store HAPs.
		T20908	OP-REQ2	30 TAC Chapter 115	30 TAC Chapter 115.111(a)(8)	Storage capacity is less than 1,000 gallons.
		T20908	OP-REQ2	40 CFR Part 60, Subpart Kb	40 CFR 60.110b(a)	Storage capacity is less than 75 m3.
		T20908	OP-REQ2	40 CFR Part 63, Subpart F	40 CFR 63.100(b)(2)	Does not store HAPs.
		T20909	OP-REQ2	30 TAC Chapter 115	30 TAC Chapter 115.111(a)(8)	Storage capacity is less than 1,000 gallons.
		T20909	OP-REQ2	40 CFR Part 60, Subpart Kb	40 CFR 60.110b(a)	Storage capacity is less than 75 m3.
		T20909	OP-REQ2	40 CFR Part 63, Subpart F	40 CFR 63.100(b)(2)	Tank is not a storage vessel by definition under MACT F because the capacity of the tank is less than 38 cubic meters (10,000 gallons).
		T2133	OP-UA3	40 CFR Part 60, Subpart K	40 CFR 60.110(a)	Tank does not store petroleum liquid.
		T2413B	OP-UA3	40 CFR Part 60, Subpart Kb	40 CFR 60.110b(a)	Storage capacity is less than 75 m3.
		T2413B	OP-UA3	40 CFR Part 63, Subpart F	40 CFR 63.101(b)	Tank is not a storage vessel by definition under MACT F because the capacity of the tank is less than 38 cubic meters (10,000 gallons).

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
		T2414	OP-UA3 OP-REQ2	40 CFR Part 60, Subpart K	40 CFR 60.110(a)	Tank does not store petroleum liquid.
		T2415	OP-UA3 OP-REQ2	40 CFR Part 60, Subpart K	40 CFR 60.110(a)	Tank does not store petroleum liquid.
		T6005	OP-REQ2	40 CFR Part 60, Subpart K	40 CFR 60.110(c)	Tank construction, reconstruction, or modification was commenced before June 11, 1973.
		T6005	OP-REQ2	30 TAC Chapter 115	30 TAC Chapter 115.110(a)	Does not store VOCs.
		T6005	OP-REQ2	40 CFR Part 63, Subpart F	40 CFR 63.100(b)(2)	Does not store HAPs.
		T19554	OP-UA3 OP-REQ2 OP-REQ3	40 CFR Part 60, Subpart K	40 CFR 60.110(a)	Tank does not store petroleum liquid.
		V18551	OP-REQ2	30 TAC Chapter 115	30 TAC Chapter 115.127(a)	Vent does not emit VOC.
		V18571	OP-UA3 OP-REQ2 OP-REQ3	40 CFR Part 60, Subpart Kb	40 CFR 60.110b(a)	Storage capacity is less than 75 m3.
		V20903	OP-REQ2	30 TAC Chapter 115	30 TAC Chapter 115.111(a)(8)	Storage capacity is less than 1,000 gallons.
		V20903	OP-REQ2	40 CFR Part 60, Subpart Kb	40 CFR 60.110b(a)	Storage capacity is less than 75 m3.
		V20903	OP-REQ2	40 CFR Part 63 Subpart F	40 CFR 63.100(b)(2)	Does not store HAPs.
		V2426B	OP-UA3 OP-REQ2	40 CFR 60 Subpart Kb	40 CFR 60.110b(b)	Storage capacity is greater than 75 m3 but less than 151 m3 and tank stores a liquid with a maximum true vapor pressure less than 15.0 kPa.

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

Table 1a: Additions

Date: 11/30/2023	Regulated Entity No.: RN102590775	Permit No.: O1942
Company Name: Westlake Epoxy Inc.	Area Name: Westlake Deer Park - BPA	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
1	V2426B	OP-UA3 OP-REQ2 OP-REQ3	R5112-1	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)

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

Table 1b: Additions

Date: 11/30/2023	Regulated Entity No.: RN102590775	Permit No.: O1942
Company Name: Westlake Epoxy Inc.	Area Name: Westla	ke Deer Park - BPA

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
1	V2426B	OP-UA3 OP-REQ2 OP-REQ3	VOC	None	§ 115.118(a)(1) §115.118(a)(5) §115.118(a)(7)	None

5 ADDITIONAL MONITORING REQUIREMENT INFORMATION

5.1 PERIODIC MONITORING

Periodic Monitoring (PM) requirements are contained in the Additional Monitoring Requirements section of the current FOP. No changes affecting unit-specific applicable requirements are made which would trigger additional PM requirements; therefore, no additional PM requirements are included in this application. This application requests removal of the PM requirements for C-18508 since this scrubber is no longer in service. If the TCEQ determines that additional PM requirements are triggered, appropriate data will be submitted upon request.

5.2 COMPLIANCE ASSURANCE MONITORING

Compliance Assurance Monitoring (CAM) requirements are applicable to control devices A18258, A20600, S18509, and S18512. These control devices are subject to the Particular Matter(s) (PM) emission limitation standards in 30 TAC §111.151 and uses a control device to achieve compliance with the limitation. If the TCEQ determines that additional CAM requirements may be triggered, an appropriate analysis will be submitted upon request.

Form OP-MON is submitted as a part of this package.

Table 1a: CAM/PM Additions

I.	Identifying Information				
Acco	unt No.: HX-2786-H	RN No.: RN	102590775	CN: CN602870511	
Perm	it No.: O4648		Project No.: 36	570	
Area	Name: Westlake Epoxy Deer Park	- BPA			
Comp	pany Name: Westlake Epoxy Inc.				
II.	Unit/Emission Point/Group/Proces	ss Information	on		
Revis	sion No.:				
Unit/E	EPN/Group/Process ID No.: \$18509				
Appli	cable Form: OP-UA15				
III.	Applicable Regulatory Requireme	nt			
Name	e: Control of Air Pollution from Vis	ible Emissio	ns and Particu	ate Matter	
SOP/	SOP/GOP Index No.: R1111-2				
Pollut	tant: PM				
Main	Standard: 111.151(a)				
IV.	IV. Title V Monitoring Information				
Monit	toring Type: CAM				
Unit S	Size: SM				
CAM	CAM/PM Option No.: CAM-FF-002				
Devia	Deviation Limit: Minimum Pressure Drop = 0.5 in.wc, Maximum Pressure Drop = 10 in. wc				
CAM	CAM/PM Option No.:				
Devia	Deviation Limit:				
V.	Control Device Information				

Control Device ID No.: **\$18509**Control Device Type: **FABFLT**

Table 1a: CAM/PM Additions

I. Id	lentifying Information				
Accoun	nt No.: HX-2786-H	RN No.: RN	102590775	CN: CN602870511	
Permit I	No.: 04648		Project No.: 36670		
Area Na	ame: Westlake Epoxy Deer Park	- BPA			
Compa	ny Name: Westlake Epoxy Inc.				
II. Uı	nit/Emission Point/Group/Proces	s Information	on		
Revisio	n No.:				
Unit/EP	PN/Group/Process ID No.: BPA4				
Applica	ble Form: OP-UA15				
III. A	pplicable Regulatory Requireme	nt			
Name:	30 TAC Chapter 115, Vent Gas C	ontrols			
SOP/G	OP Index No.: R5121-1				
Pollutar	nt: VOC				
Main St	tandard: § 115.121(a)(1)				
IV. Ti	itle V Monitoring Information				
Monitor	Monitoring Type: CAM				
Unit Siz	ze: SL				
CAM/PI	M Option No.: CAM-FL-001				
Deviation	Deviation Limit: No pilot flame.				
CAM/PI	CAM/PM Option No.:				
Deviation	Deviation Limit:				
V. C	ontrol Device Information				
Control	Device ID No.: A20600				
Control	Control Device Type: Flare				

Table 1a: CAM/PM Additions

I. Identifying Information				
Account No.: HX-2786-H	RN No.: RN1025 9	90775	CN: CN602870511	
Permit No.: 04648	Proje	ect No.: 36670		
Area Name: Westlake Epoxy Deer Park	- BPA			
Company Name: Westlake Epoxy Inc.				
II. Unit/Emission Point/Group/Proces	ss Information			
Revision No.:				
Unit/EPN/Group/Process ID No.: \$18512				
Applicable Form: OP-UA15				
III. Applicable Regulatory Requireme	nt			
Name: Control of Air Pollution from Vis	ible Emissions ar	nd Particulate Ma	itter	
SOP/GOP Index No.: R1111-3				
Pollutant: PM				
Main Standard: 111.151(a)				
IV. Title V Monitoring Information				
Monitoring Type: CAM				
Unit Size: SM				
CAM/PM Option No.: CAM-FF-002				
Deviation Limit: Minimum Pressure Drop = 0.5 in.wc, Maximum Pressure Drop = 10 in. wc				
CAM/PM Option No.:				
Deviation Limit:				
V. Control Device Information				

Control Device ID No.: **\$18512**Control Device Type: **FABFLT**

Table 1a: CAM/PM Additions

I.	Identifying Information		
Acc	count No.: HX-2786-H	RN No.: RN102590775	CN: CN602870511
Per	mit No.: O4648	Project No.: 360	670
Are	a Name: Westlake Epoxy Deer Park	- BPA	
Col	mpany Name: Westlake Epoxy Inc.		
II.	Unit/Emission Point/Group/Proce	ss Information	
Re	vision No.:		
Uni	t/EPN/Group/Process ID No.: A18258		
App	olicable Form: OP-UA15		
III.	Applicable Regulatory Requireme	ent	
Naı	me: Control of Air Pollution from Vis	sible Emissions and Particul	ate Matter
SO	P/GOP Index No.: R1111-1		
Pol	lutant: PM		
Ма	in Standard: 111.151(a)		
IV.	Title V Monitoring Information		
Мо	nitoring Type: CAM		
Uni	t Size: SM		
CA	M/PM Option No.: CAM-FF-002		
De	viation Limit: Minimum Pressure Dro	o = 0.5 in.wc, Maximum Pres	ssure Drop = 10 in. wc
CA	M/PM Option No.:		
De	viation Limit:		
V.	Control Device Information		
Coı	ntrol Device ID No.: A18258		
		·	<u> </u>

Control Device Type: FABFLT

6 COMPLIANCE STATUS INFORMATION

6.1 APPLICATION COMPLIANCE PLAN AND SCHEDULE (FORM OP-ACPS)

This section contains the Form OP-ACPS which satisfies the requirements of 30 TAC §122.132(e)(4). This form contains a specific statement regarding continued compliance with current requirements, and compliance with requirements that may become effective. It also contains an indication of compliance status with respect to all applicable requirements. All emission units addressed in this application are in compliance with all their respective applicable requirements.

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

Date:	Regulated Entity No.:		Permit No.:
Company Name:		Area Na	me:

- Part 1 of this form must be submitted with all initial FOP applications and renewal applications.
- The Responsible Official must use Form OP-CRO1 (Certification by Responsible Official) to certify information contained in this form in accordance with 30 TAC § 122.132(d)(8).

Part 1

A.	Compliance Plan — Future Activity Committal Statement			
As th appli	The Responsible Official commits, utilizing reasonable effort, to the following: As the responsible official it is my intent that all emission units shall continue to be in compliance with all applicable requirements they are currently in compliance with, and all emission units shall be in compliance by the compliance dates with any applicable requirements that become effective during the permit term.			
В.	Compliance Certification - Statement for Units in Compliance* (Indicate response by entering an "X" in the appropriate column)			
1.	With the exception of those emission units listed in the Compliance Schedule section of this form (Part 2, below), and based, at minimum, on the compliance method specified in the associated applicable requirements, are all emission units addressed in this application in compliance with all their respective applicable requirements as identified in this application?	☐ YES ☐ NO		
2.	Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	☐ YES ☐ NO		
3.	If the response to Item B.2, above, is "Yes," indicate the total number of Part 2 attachments included in this submittal. (For reference only)			
*	For Site Operating Permits (SOPs), the complete application should be consulted for apprequirements and their corresponding emission units when assessing compliance status For General Operating Permits (GOPs), the application documentation, particularly For should be consulted as well as the requirements contained in the appropriate General F 30 TAC Chapter 122.	s. m OP-REQ1		
	Compliance should be assessed based, at a minimum, on the required monitoring, testi keeping, and/or reporting requirements, as appropriate, associated with the applicable question.	•		

7 SUPPLEMENTAL INFORMATION

7.1 AREA MAP

The Westlake Deer Park Plant is located at 5900 Highway 225 in Deer Park, TX. An area map indicating the site location is provided in Figure 7-1.

7.2 PROCESS DESCRIPTION

7.2.1 BPA-4 Production Facility

The Deer Park Plant's BPA-4 Unit, which includes a Dephenolation Unit and flaked BPA storage and loading facilities, is dedicated to producing BPA to fulfill BPA requirements for EPON™ resin production and sales to customers. The Dephenolation Unit processes the wastewaters from the BPA-4 unit to recover the phenol and meet the requirements for off-site bio-treatment of wastewater. Product from the BPA-4 unit is a high-purity, polycarbonate grade BPA.

The unit feedstocks and products are distributed via pipeline, tank truck, rail car, hopper truck, and hopper car. Air emissions from the unit are primarily volatile organic compounds (VOCs) and particulate matter with diameters of 10 microns or less (PM_{10}), mainly from storage tanks, transfer operations, and fugitive components. The facility also emits nitrogen oxides (NO_x), carbon monoxide (NO_x), sulfur dioxide (NO_x), and carbon dioxide (NO_x).

A detailed process description is given below for the processes associated with the BPA-4 Unit.

7.2.2 BPA-4 Process

The continuous process utilizes a reaction employing a fixed catalyst bed and a sulfur containing co-catalyst that is fed to and flows through the unit. Acetone and phenol react to form BPA and yields one mole of water for each mole of acetone reacted. Water, along with the co-catalyst and a trace of unreacted acetone, is removed from the reaction product. Recovered acetone and co-catalyst are recycled to reaction while the aqueous stream, containing phenol and small amounts of co-catalyst and acetone, is routed to the Dephenolation Unit.

The material generated in reaction is cooled to form crystals of near pure BPA by evaporating pentane. Pentane from the crystallization step is condensed and recycled back to crystallization. Excess phenol and solubilized BPA from the crystallization system recycles to the reactor. Surge for the flow and surge for the shutdown and the decontamination of equipment are provided by a low pressure, heat traced and insulated storage tank (T20100). The vent from this tank routes to the enclosed vent scrubbed flare system. Further processing of the purified BPA yields a very high purity product

suitable for either epoxy resin or polycarbonate resin manufacture. The product is used directly as a melt in epoxy resin production or flaked for sales.

7.2.3 Dephenolation, Phenol Recovery

The Dephenolation facility is used to recover phenol from water produced by the BPA reaction and from process water. Net effluent is contacted with isopropyl ether in an extractor column to recover dissolved phenol. Hydrochloric acid (HCl) is used to enhance phenol removal.

The phenol-ether extract separates from the aqueous phase and is stored in intermediate feed tanks T147 and T1857. The first tank, T147, allows settling of entrained water. It operates at a constant level and overflows to T1857. The vapor spaces of these two tanks are connected with the vapor space of the ether surge tank, T2413B. A nitrogen blanket is maintained on pressure control to exclude oxygen. The common vent from the three tanks is routed to atmosphere through a two stage direct contact scrubber. Phenol and water are used to remove co-catalyst, isopropyl ether, and phenol from the vent gas. The liquid from the scrubber is recycled back to the Dephenolation Unit.

Isopropyl ether is recovered from the phenol-ether extract for reuse in extraction. The recovered phenol is purified and recycled back to the BPA process. A heavy ends residue is sold to off-site customers. The isopropyl ether also extracts organic sulfides from the aqueous stream. The sulfides accumulate in the ether over time. A small purge of concentrated sulfides in ether can be taken from the distillation column and routed to the BPA-4 flare.

The extracted effluent is steam stripped to remove dissolved isopropyl ether before being routed to the biotreaters. Process water and drips from areas where phenol may be present is also collected. Process water is collected from secondary containment systems via sump T20601 and may be routed to the biotreaters or be processed through Dephenolation before release to the biotreaters.

7.2.4 Vent Recovery and Relief System

Vents from the BPA-4 Unit, the Dephenolation Unit and the phenol recovery systems are collected for treatment in these facilities. The equipment consists of two liquid/gas knockout drums and an air-assist flare system. Gases containing nitrogen, isopropyl ether, co-catalyst, phenol, acetone, and pentane are routed through a liquid/gas knockout drum (Vent/Relief Accumulator). Gas from this drum is scrubbed with circulated water. Residual gases from this scrubber flow directly to another liquid/gas separator located at the base of a flare stack.

Natural gas is added to the scrubber vent gas to ensure the heating value exceeds 300 BTU/scf and to meet the flare vendor's minimum stack velocity. Additional natural gas is added if necessary to maintain low oxygen content in the flare stack. The air-assisted flare is designed for smokeless operation up to 5,000 lb/hr with a maximum design capacity of 26,000 lb/hr to handle equipment relief loads in the event of a total cooling

water failure or major fire. The flare is equipped with a remote flame detector and an automatic igniter system for its single pilot.

Another liquid/gas separator serves to collect and surge decontamination purges from equipment within the BPA-4 and Dephenolation Units. Major equipment is connected via permanent piping to a vessel located below grade elevation and situated to allow free draining of equipment prior to maintenance. Water and/or nitrogen flush of the equipment is collected in this vessel. Collected liquid is returned to the process while gas or vapor is routed to the vent accumulator system.

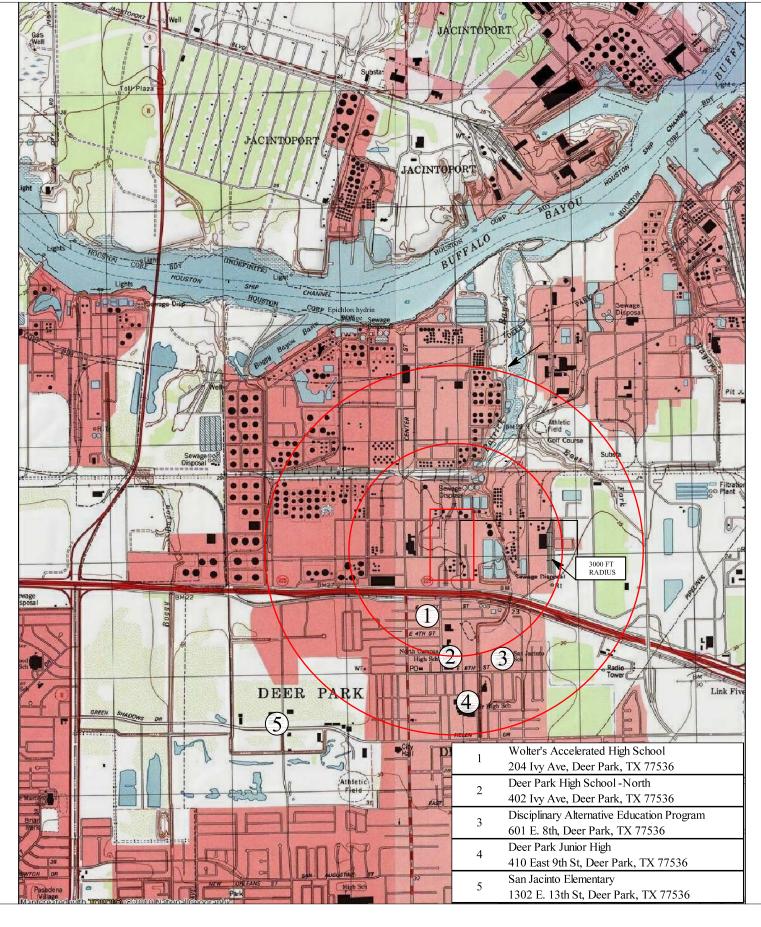
Relief valves are also connected to route through the vent accumulator before routing to the flare liquid knockout and flare stack (EPN18). A liquid seal serves to routed normal vent flows through the scrubber system while allowing high rate relief flow to bypass scrubbing.

7.2.5 Aqueous Storage Tanks

Three storage tanks, T9554, T20801 and T20802 are used for aqueous surge for the Dephenolation Unit. Material from these tanks is reprocessed in the Dephenolation system. Normal operation provides for processing in Dephenolation, although facilities do allow analysis and direct discharge to the biotreater if appropriate. The possibility for recycle and reprocessing in the Dephenolation system is provided.

7.2.6 Utilities

The reaction and purification of BPA described above requires heat, primarily in the form of steam, as well as cooling water. Westlake obtains steam from the adjacent chemical complex and cooling water from a Westlake owned cooling tower. Tanks T1850, T20907, T20908, V20903, and T18520 store various lubricating oils for unit compressors; T20909 stores waste oil. In addition, T20901 and T20910 store demineralized water and emergency shower water, respectively. The BPA-4 Unit Wastewater System (BPA4WW) receives wastewater drains to a belowground sump. Collected wastewater is pumped to one of two aboveground storage tanks before it is sent to the Dephenolation unit.



Drawing: Area Map	Figure 7-1
Revision #: 1	Westlake Epoxy Inc-
Date: November 2023	Deer Park Plant
Project #:	Area Map