

Texas Commission on Environmental Quality

Title V Existing

4100

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	WACO COMPOSITES PLANT
Does the site have a physical address?	Yes
Physical Address	
Number and Street	302 S 27TH ST
City	WACO
State	TX
ZIP	76710
County	MCLENNAN
Latitude (N) (##.#####)	31.536388
Longitude (W) (-###.#####)	97.15
Primary SIC Code	3089
Secondary SIC Code	
Primary NAICS Code	326199
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN104363924
What is the name of the Regulated Entity (RE)?	WACO COMPOSITES PLANT
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	302 S 27TH ST
City	WACO
State	TX
ZIP	76710
County	MCLENNAN
Latitude (N) (##.#####)	31.536388
Longitude (W) (-###.#####)	-97.15
Facility NAICS Code	
What is the primary business of this entity?	MANUFACTURE OF COMPOSITE PANELS

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN605847821
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Specialty Composites Group, LLC
Texas SOS Filing Number	803505413
Federal Tax ID	
State Franchise Tax ID	17429824026
State Sales Tax ID	

Local Tax ID	
DUNS Number	
Number of Employees	21-100
Independently Owned and Operated?	Yes

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	SPECIALTY COMPOSTIES GROUP LLC
Prefix	MR
First	ROBERT
Middle	
Last	SIMON
Suffix	
Credentials	
Title	COO
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 20008
Routing (such as Mail Code, Dept., or Attn:)	
City	WACO
State	TX
ZIP	76702
Phone (###-###-####)	2547523622
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	bob@vandlmanagement.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.	KAREN BULLARD(BULLARD ENVIRON...)
Organization Name	BULLARD ENVIRONMENTAL CONSULTING INC
Prefix	MS
First	KAREN
Middle	
Last	BULLARD
Suffix	
Credentials	
Title	ENGINEERING PARTNER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic

Mailing Address (include Suite or Bldg. here, if applicable)	260 E RIDGEWOOD RD
Routing (such as Mail Code, Dept., or Attn:)	
City	GEORGETOWN
State	TX
ZIP	78633
Phone (###-###-####)	7375006048
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	karen@bullardec.com

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	31 Deg 32 Min 11 Sec
3) Permit Longitude Coordinate:	97 Deg 9 Min 0 Sec
4) Is this submittal a new application or an update to an existing application?	Update
4.1. Select the permit/project number for which this update should be applied.	4100-36711
5) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

Attach OP-2 (Application for Permit Revision/Renewal)

Attach OP-ACPS (Application Compliance Plan and Schedule)

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

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

If applicable, attach OP-AR1 (Acid Rain Permit Application)

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name	OPCRO1 080625 application h.pdf
Hash	C0FBE1AEC91CDF699ED3B51B935789326E28C2AC16294658DEDCFF1F11C3E533
MIME-Type	application/pdf

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

Certification

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

1. I am Robert S Simon, the owner of the STEERS account ER017288.
2. I have the authority to sign this data on behalf of the applicant named above.
3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
8. I am knowingly and intentionally signing Title V Existing 4100.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEC

OWNER OPERATOR Signature: Robert S Simon OWNER OPERATOR

Account Number:	ER017288
Signature IP Address:	98.6.217.179
Signature Date:	2025-08-07
Signature Hash:	9D2B21DC08469D12CE47ECC23B6DF6D07B5EB007C0209163B65EDDF88855F1A2
Form Hash Code at time of Signature:	BFA327CD7FA2662FF65EB740DB849F1ECF983E1E62AA94D7E7D77501E5678B91

Submission

Reference Number:	The application reference number is 807305
Submitted by:	The application was submitted by ER017288/Robert S Simon
Submitted Timestamp:	The application was submitted on 2025-08-07 at 16:25:58 CDT
Submitted From:	The application was submitted from IP address 98.6.217.179
Confirmation Number:	The confirmation number is 670015
Steers Version:	The STEERS version is 6.92

Permit Number:

The permit number is 4100

Additional Information

Application Creator: This account was created by Karen M Bullard

From: karen@bullardec.com
Sent: Thursday, August 7, 2025 12:16 PM
To: Kyle Murray
Subject: RE: Working Draft Permit -- FOP O4100/Project 36711, Specialty Composites Group LLC / Waco Composites Plant
Attachments: OPCRO1 080625 application h.pdf

Kyle,

Here is the form – I'm putting it on STEERS for my client to upload as well.

Thanks,
Karen.

(737) 500-6048 (cell)
(512) 659-3228 (secondary)

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

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

I. Identifying Information
RN: 104363924
CN: 605847821
Account No.: MBA009I
Permit No.: 4100
Project No.: 36711
Area Name: WACO COMPOSITES PLANT
Company Name: Specialty Composites Group, LLC
II. Certification Type <i>(Please mark appropriate box)</i>
<input checked="" type="checkbox"/> Responsible Official Representative <input type="checkbox"/> Duly Authorized Representative
III. Submittal Type <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>
<input type="checkbox"/> SOP/TOP Initial Permit Application <input type="checkbox"/> Permit Revision, Renewal, or Reopening
<input type="checkbox"/> GOP Initial Permit Application <input checked="" type="checkbox"/> Update to Permit Application
<input type="checkbox"/> Other:

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

IV. Certification of Truth

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

I, Robert Simon certify that I am the Responsible Official
(Certifier Name printed or typed) *(RO or DAR)*


and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:

Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).

Time Period: From 07/01/2024 to 07/17/2025
(Start Date) *(End Date)*

Specific Dates: _____
(Date 1) *(Date 2)* *(Date 3)* *(Date 4)*

(Date 5) *(Date 6)*

Signature:  Signature Date: 8-6-2025

Title: COO

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

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

To: karen@bullardec.com

Subject: RE: Working Draft Permit -- FOP O4100/Project 36711, Specialty Composites Group LLC / Waco Composites Plant

Good morning Karen,

I am near completion of the technical review for this project and have sent it to my technical specialist for a final QA/QC review. As a final step, I will need you to certify all previous application updates and correspondence. To do this you will need to submit a Form OP-CRO1 through STEERS with the Time Period range from 07/01/2024 – 07/17/2025 to cover all application updates that were submitted (please verify these are the correct dates). As a note, the RO or DAR would have to complete the submission for the documents to be properly certified. Please complete this by **Friday, August 8th**.

Feel free to email me the signed OP-CRO1 first in order to meet the deadline, but the form will still need to be submitted through STEERS . 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: karen@bullardec.com
Sent: Thursday, July 17, 2025 8:47 PM
To: Kyle Murray
Subject: RE: Working Draft Permit -- FOP O4100/Project 36711, Specialty Composites Group LLC / Waco Composites Plant

Follow Up Flag: Follow up
Flag Status: Flagged

Kyle,

For some reason, this didn't make it into my inbox. I just searched my email when my client asked about the status of the project. These look fine to me. Please proceed! Sorry for the late response.

Thanks,
Karen.

(737) 500-6048 (cell)
(512) 659-3228 (secondary)

From: Kyle Murray <Kyle.Murray@tceq.texas.gov>
Sent: Wednesday, June 18, 2025 2:54 PM
To: karen@bullardec.com
Subject: RE: Working Draft Permit -- FOP O4100/Project 36711, Specialty Composites Group LLC / Waco Composites Plant

Good afternoon Karen,

I have attached the revised WDP incorporating requirements from our last correspondence. Please review the draft and provide me with any comments by **Thursday, July 3rd**. If you do not have any comments, please indicate your approval so we can move forward with the application process. I have included some notes below depicting some of the changes I have made to the applicable citations from the OP-REQ3 you had provided. Let me know if you have any questions. Thank you!

Notes about citations added to the citations provided on the OP-REQ3:

- 3.4805(b)-Table 4.1 was added to use as the "main standard". Normally this is an emission limit, but for this scenario the work practice standard will be used. A shortened version of the text from this table portion is added for the textual description.
- Standard 63.5835(c) - This general requirement is applicable to all sources, not just those with control devices or emission limitations. This is a general requirement to operate safely and to minimize emissions (in 63.6(e)(1)(i) which is referenced.)

- Standard 63.5860(a) – The paragraph (a) was added since 63.5860 is just a section heading without its own text. 63.5860(a) is applicable since that says comply with any standard in 63.5805 using procedures in Tables 8-9 (and Table 9 has initial compliance requirement for the work practice standard in Table 4.1). 63.5860(b) is not applicable since it pertains to using add-on control devices, which are not part of compliance with this work practice standard, so does not need to be included.
- Standard 63.5900(c) – General requirement stating you must meet emission limits and work practice standards at all times.
- Mon/Test 63.5900(a)(4) - This states that compliance with the Table 4 work practice standards is demonstrated by performing the work practice standard. (This could have been classified as a general applicability statement and not listed, but since we included it in our flowchart for other units subject to work practice, it is included here for consistency.)
- Reporting 63.5900(b) - This states you must report each deviation from each standard. That would include the work practice standard.
- Reporting 63.5905(a)-(b) – Since we listed this section in our flowchart as 63.5905(a) and 63.5905(b), the [G]63.5905 citation has been replaced with these for consistency. There are no other subparagraphs and 63.5905 does not have its own text, so this formatting change does not exclude anything.
- Reporting [G]63.5910(d) – This is needed since it pertains to deviation reporting, and there can be deviations for work practice standards.
- Reporting 63.5912(c)-(d), [G]63.5912(e)-(f) – 63.5912(c) refers to semiannual compliance reports containing info in 63.5910(c)-(f) and (i), and some of that info is relevant for this scenario. Then 63.5912(d)-(f) discuss submitting reports electronically in CEDRI. Therefore, these are needed.

Notes about citations deleted from the citations provided on the OP-REQ3:

- The [G] notation was removed from reporting 63.5910(a), (g), and (h) since these citations have no subparagraphs.
- Recordkeeping 63.5925 was removed since we do not typically include the citations that just state what parts of the general provisions apply in the unit-specific requirements. (We just include all general provisions in Special Terms and Conditions.) This will also provide consistency with the other scenario.

Thank you again for your patience with this project.

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: karen@bullardec.com
Sent: Friday, February 7, 2025 5:01 PM
To: Kyle Murray
Subject: RE: Working Draft Permit -- FOP O4100/Project 36711, Specialty Composites Group LLC / Waco Composites Plant
Attachments: OPREQ3 h.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Kyle,

I've attached the completed form. I apologize I couldn't get it done by noon, but I believe it is complete – I reviewed the regulations carefully – they are quite extensive.

Thanks,
Karen.

(737) 0-6048 (cell)
(512) 9-3228 (secondary)

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

Table 1a: Additions

Date: 02/07/2025	Regulated Entity No.: RN 104363924	Permit No.: 04100
Company Name: Specialty Composites Group LLC	Area Name: Waco Composites Plant	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
	EU-1	OP-UA66	63WWWW-1	HAPS	MACT WWWW	§63.5805(b), §63.5860 §63.5835(a)

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

Table 1b: Additions

Date: 02/07/2025	Regulated Entity No.: RN 104363924	Permit No.: 04100
Company Name: Specialty Composites Group LLC	Area Name: Waco Composites Plant	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
	EU-1	OP-UA66	HAPS		§63.5915(a)(1),(d), [G]§63.5920, §63.5925	[G]§63.5905,[G]§63.5910(a)-(c), (g)-(h)

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

Sent: Thursday, February 6, 2025 9:25 AM

To: Karen Bullard <karen@bullardec.com>

Subject: RE: Working Draft Permit -- FOP O4100/Project 36711, Specialty Composites Group LLC / Waco Composites Plant

Good morning Ms. Bullard,

We had a brief conversation last week about the Form OP-REQ3, Table 1a and Table 1b for unit EU-1, index number 63WWWW-1. We require this form to move forward with your application. Please have it submitted to me no later than noon, tomorrow (02/07). 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: Kyle Murray

Sent: Monday, January 27, 2025 8:24 AM

To: Karen Bullard <karen@bullarddec.com>

Subject: RE: Working Draft Permit -- FOP O4100/Project 36711, Specialty Composites Group LLC / Waco Composites Plant

Good morning Ms. Bullard,

I wanted to check in on the status of the requested Form OP-REQ3. Our deadline was set for January 23rd, and we will need this form to move forward with the project. Let me know if you have any questions, and I would be happy to assist. Have a great day!

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: Kyle Murray

Sent: Friday, January 10, 2025 9:29 AM

To: karen@bullarddec.com

Subject: RE: Working Draft Permit -- FOP O4100/Project 36711, Specialty Composites Group LLC / Waco Composites Plant

Good morning Ms. Bullard,

I spoke with my technical specialist and unfortunately high-level requirements are only used when we don't have any RRT. In this case, we have developed most of the RRT, and this one small portion was excluded due to error. We are unsure of the timing for when that will be fixed. So, we will still need to use detailed citations at this point in time. I hope this explanation helps, but please let me know if you have any further 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



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

From: Karen Bullard <karen@bullardec.com>

Sent: Thursday, January 9, 2025 4:59 PM

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

Subject: RE: Working Draft Permit -- FOP O4100/Project 36711, Specialty Composites Group LLC / Waco Composites Plant

Since the RRT hasn't been developed for this item correctly, can we just go back to the high-level requirements? This was previously permitted in this manner. You mentioned previously that high-level requirements can be used where the RRT hasn't been developed.

Thanks!

Karen.

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

Sent: Thursday, January 9, 2025 3:25 PM

To: karen@bullardec.com

Subject: RE: Working Draft Permit -- FOP O4100/Project 36711, Specialty Composites Group LLC / Waco Composites Plant

Good afternoon Ms. Bullard,

After reviewing your revised UA-66, we have determined that our RRT has an error where the compression molding subject to Table 4.1 is actually not addressed in our flow chart or form. Therefore at this time, there is no correct way to fill out the form for index number 63WWWW-1. To move forward with your application, we will need a Form OP-REQ3 – Table 1a and Table 1b filled out for unit EU-1, index number 63WWWW-1 provided to us. Please provide us with the applicable citations for this unit. We will review these and add your requirements manually to the permit. We will notify our RRT team of this problem so it can be fixed in the future. Please provide these updates by **Thursday, January 23rd**. 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



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

at www.tceq.texas.gov/customersurvey

From: Karen Bullard <karen@bullardec.com>

Sent: Wednesday, November 20, 2024 4:02 PM

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

Cc: 'laura@vandlmanagement.com' <laura@vandlmanagement.com>; 'bob@vandlmanagement.com' <bob@vandlmanagement.com>

Subject: RE: Working Draft Permit -- FOP O4100/Project 36711, Specialty Composites Group LLC / Waco Composites Plant

Hi Kyle,

Please see my answers below in green.

Thanks,
Karen.

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

Sent: Tuesday, November 19, 2024 10:08 AM

To: karen@bullardec.com

Cc: laura@vandlmanagement.com; bob@vandlmanagement.com

Subject: RE: Working Draft Permit -- FOP O4100/Project 36711, Specialty Composites Group LLC / Waco Composites Plant

Good morning Ms. Bullard,

I wanted to inquire about my previous email sent on 10/29 containing the revised WDP for this project. Please provide a timeline for your response or any applicable updates for your application. Thanks.

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: Kyle Murray

Sent: Tuesday, October 29, 2024 2:43 PM

To: karen@bullardec.com

Cc: laura@vandlmanagement.com; bob@vandlmanagement.com

Subject: RE: Working Draft Permit -- FOP O4100/Project 36711, Specialty Composites Group LLC / Waco Composites Plant

Good afternoon Karen,

Thank you for your patience while we conducted our analysis regarding your comments on the Applicable Requirements Summary. A revised WDP has been attached and our response to your previous comments can be seen below in blue. I have copied your initial comments for reference. Please provide a response to these comments and the revised WDP by **Friday, November 8th, or sooner if possible.**

- 1. The draft permit Unit Summary and Applicable Requirements tables leave out the closed molding operations linked to the index number 63WWWW-1. These operations are not subject to an emissions limitation, but are subject to the work practice standards. -- Based on my review of our rule analysis, as well as EPA's publications of proposed and final rule language in the federal register, we believed that the rule did not specify requirements for these unit characteristics. Since the "CLSMLD" code for Production Process Type is used, this scenario has been identified as covering centrifugal casting operations considered closed molding that are listed in Table 3.7.b and Table 3.8.b. (You are correct that these do not have emission limits.) § 63.5805(a) also discusses requirements for centrifugal casting operations – and neither (a) nor (a)(1)-(2) mention compliance with work practice standards in Table 4, unlike other citations in this section which mention both Table 3 and 4 for other sources. The heading of Table 4 also states "As specified in § 63.5805, you must meet the work practice standards in the following table that apply to you". It is not clear if the work practice standards in Table 4 apply to this particular operating scenario. Please provide the citations you believe are applicable so that we may review the reasoning.*

Please see the attached exhibit which has been used in permitting and MACT WWW reporting and approved for its assumptions. The 63WWWW-1 index number is linked to a process that is considered compression/closed molding. When completing the OPUA66 I assumed the CLSMLD code for the production process was for all closed molding processes, but this is incorrect. The process code should correspond to WWW, just like the other index number, and a revised OP-UA66 is attached. As previously discussed, closed molding processes are not subject to emission standards, but are listed in Table 4 as having specific additional work practice standards for "A new or existing closed molding operation using compression/injection molding." Other work practice standards for mixing and cleaning may also apply in the same way they apply for 63WWWW-2 for open molding processes.

2. *The draft permit labels the thermoset resin operations “MISCELLANEOUS AREA SOURCES OF HAPS.” The operations comprise a major source of HAPs at this site (i.e. they are not area sources) and are the operations that trigger the requirement to obtain a Title V operating permit. Please see the existing Unit Summary table (screenshot below), which labels them, “Reinforced Plastic Composites Production.” I propose leaving this unchanged. “No changing attributes” would also be appropriate in the last column for EU-1, but the existing text shown below clarifies the two types of thermoset resin operations. – You are correct that the Unit Type should be Reinforced Plastic Composites Production since that is the type assigned to OP-UA66 (The change is reflected in the revised WDP). If we determine from your response to Item 1 that the CLSMLD code scenario DOES have requirements, then the Requirement Driver will show the differences in attributes between -1 and 63WWWW-2. If we determine CLSMLD does NOT have requirements, and 63WWWW-2 is the only row in the permit, then it will say “No changing attributes” (as reflected in the revised WDP) because there are no other rows in the permit for this rule with which to compare the answers.*

As explained above, the 63WWWW-1 closed/compression molding scenario does have requirements and does need to be on this table.

3. *We’d like to request “high-level” requirements for the MACT WWWW and DDDDD requirements. Many facilities are permitted in this manner and the thermoset resin facilities, in particular have many ways of complying with the emission limitations including compliant materials and emissions averaging. This facility uses compliant materials, but they are allowed to change compliance methods in the regulation 63WWWW. The existing applicable requirements table is shown below for your reference. -- High-level language is allowed only on a temporary basis while we are completing our rule analysis. Once our rule analysis is done and the flowchart and form are posted, we must convert to detailed citations. For rules where we do not plan to develop those tools (e.g. if the number of sites with the rule is too small to justify workload), high-level is not used at all and the applicant must provide detailed citations which we review. The reason that MACT WWWW and DDDDD were high-level were because our rule analysis was pending. We have completed that for both rules now. As permits come in for their next renewal (or revision involving WWWW or DDDDD units), we are requesting the form and switching to citations. Therefore, all the permits that have this language will be updated over time.*

Thanks for this discussion. FYI - I am seeing issued Title V renewals this year that still contain the high level language, which is why we requested it here for simplicity’s sake.

4. *This comment applies to The Applicable Requirements table for EU-1, SOP index number 63WWWW-2 of the draft permit in the Emissions Limitations Column. § 63.5895(b) does not apply (i.e. should be deleted), but § 63.5895(c) & (d) do apply (d needs to be added). -- § 63.5895(b) has been removed from both the monitoring and recordkeeping requirement columns. We agree that § 63.5895(c) applies and it is listed in the recordkeeping requirements column. § 63.5895(d) has been added to the recordkeeping and reporting requirements columns.*

I concur with these changes.

5. *This comment applies to the Applicable Requirements table for EU-1, SOP index number 63WWWW-2 of the draft permit in the Reporting Requirements column. [G]§ 63.5912(a) and [G]§ 63.5912(b) do not apply (i.e. should be deleted) -- We agree that [G]§ 63.5912(a) and [G]§ 63.5912(b) do not apply. They have been removed from the WDP.*

I concur with these changes.

6. *This comment applies to the Applicable Requirements table for EU-1 and EU-2, SOP index number 63DDDDD of the draft permit in the Emission Limitations column. [G]§ 63.7540(a)(10) does not apply (i.e. should be deleted), as this section is only applicable to units with heat input capacity of 10 MM Btu per hour or greater. Instead, § 63.7540(a)(12) applies for both boilers, which each have a heat input capacity of less than 1 MM Btu/hr. This comment applies to the same reference which appears in the Monitoring column as well. -- You are correct that the frequency in § 63.7540(a)(10) is not applicable to these units. The reason that [G]§ 63.7540(a)(10) is included is because the procedures in the subparagraphs 63.7540(a)(10)(i)-(vi) do apply. They are referenced by § 63.7540(a)(12). Because most units in this rule will at least need all those subparagraphs, and then additionally all the other units with emission limits will also need § 63.7540(a)(10) itself, we chose to use a grouped format § 63.7540(a)(10) for simplicity. This allows us to list [G]§ 63.7540(a)(10) instead of multiple citations. Grouping simply means you would comply with the applicable citations in the group, not that all citations in the group automatically apply. If you would like me to break apart the group and only list the subparagraphs of § 63.7540(a)(10), I can do that, but it is not strictly necessary.*

That will be fine since the (a)(10) subparagraphs will all apply, as referenced in (a)(12).

7. *This comment applies to the Applicable Requirements table for EU-1 and EU-2, SOP index number 63DDDDD of the draft permit in the Monitoring column. [G]§ 63.7521(g), (h) and (i) are not applicable, as natural gas is the only fuel. § 63.7521(f) (1) states, “(1) You are not required to conduct the fuel specification analyses in paragraphs (g) through (i) of this section for natural gas or refinery gas.” -- We agree that [G]§ 63.7521(g), (h), and (i) are not applicable for natural gas and they have been removed from the Monitoring column. [G]§ 63.7521(f) has also been removed.*

I concur with these changes.

8. § 63.7530(g) and [G]§ 63.7540(c) are also not applicable in the Monitoring column for EU-1 and EU-2 for the same reason as item seven above – natural gas is the fuel. -- § 63.7530(g) and [G]§ 63.7540(c) have been removed from the Monitoring column of the WDP for EU-2 and EU-3, SOP index number 63DDDDD.

I concur with these changes.

9. This comment applies to the Applicable Requirements table for EU-1 and EU-2, SOP index number 63DDDDD of the draft permit in the Monitoring column. [G]§ 63.7540(a)(10) does not apply (i.e. should be deleted), as this section is only applicable to units with heat input capacity of 10 MM Btu per hour or greater. Instead, § 63.7540(a)(12) applies for both boilers, which each have a heat input capacity of less than 1 MM Btu/hr. -- See my comments for Item 6 as to what we could change. (Only difference will be that 63.7540(a)(12) does not appear in monitoring/testing. That is because the actual monitoring procedures are found in the subparagraphs of 63.7540(a)(10). 63.7540(a)(12) is just the work practice standard to conduct the tune-up so it only goes in the standards.)

That will be fine since the (a)(10) subparagraphs will all apply, as referenced in (a)(12).

10. This comment applies to the Applicable Requirements table for EU-1 and EU-2, SOP index number 63DDDDD of the draft permit in the Recordkeeping column. § 63.7555(g) and § 63.7555(h) do not apply since natural gas is the fuel. We agree that § 63.7555(g) is not applicable for natural gas and the citation has been removed from the Recordkeeping column. For § 63.7555 (h), that is included for operational flexibility since the “unit designed to burn gas 1 subcategory” allows the unit up to 48 hours per year to burn liquid fuel for periodic test of liquid fuel, maintenance or operator training, and it also allows the unit to burn liquid fuel during periods of gas curtailment or gas supply interruptions. If this unit will never fire liquid fuel in any circumstance, then this citation can be removed.

The facility does not expect to ever burn liquid fuel, but the § 63.7555(h) reference can remain in case of emergency.

11. This comment applies to the Applicable Requirements table for EU-1 and EU-2, SOP index number 63DDDDD of the draft permit in the Reporting column. [G]§ 63.7521(g) is not applicable, as natural gas is the only fuel. § 63.7521(f) (1) states, “(1) You are not required to conduct the fuel specification analyses in paragraphs (g) through (i) of this section for natural gas or refinery gas.” -- [G]§ 63.7521(g) has been removed from the Reporting column of the WDP for EU-2 and EU-3, SOP index number 63DDDDD.

I concur with these changes.

12. [G]§ 63.7545(f) is also not applicable in the Reporting column for EU-1 and Eu2 for the same reason as item eleven above – natural gas is the only fuel. – You are correct that [G]63.7545(f) would not be needed as long as natural gas is being fired. However, the citation describes a situation for using alternative fuel during natural gas curtailment or supply interruption. In other words, this procedure is for a presumably rare and unexpected time when natural gas would not be available. If confirmation can be made an alternative fuel would not be used in that circumstance, then the citation can be removed. Otherwise, it needs to remain in the permit to account for that possibility.

The facility does not expect to ever burn liquid fuel, but the [G]63.7545(f) reference can remain in case of emergency.

With regard to Item 1, if you would like a call to discuss the potential requirements before submitting citations, or after, we can certainly do that. Let me know if you have any questions about any of the items above and I would be happy to help. 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

Revised Exhibit R-1 Composites MACT Compliance for the Waco Composites Operation

A composites manufacturer that is a major HAP source (greater than 10 tpy SHAP) is subject to federal NESHAP requirements under 40 CFR 63 Subpart WWWW, which is also known as the Composites MACT Rule. When the Waco Composites Plant becomes a major HAP source, then a Composites MACT Rule compliance plan must be proposed and maintained.

The composite manufacturing process at Waco Composites is a hybrid combination of two different processes. The first process step uses a mechanical winding arm to draw glass fabric through a resin bath to produce a resin-soaked glass panel. The second process step stacks the resin soaked armor panels between aluminum sheets and cures the stack of panels in a traditional heated compression mold press.

There is no specific classification in the Composites MACT Rule for the hybrid armor production process used by Waco Composites. However, the first process step closely resembles the filament winding process described in Subpart WWWW. The only differences are that a roll of woven glass fiber bundles is drawn through the resin bath instead of numerous individual fibers, and the wet fibers are wound on a winding arm instead of a rotating mandrel mold. The second step is a traditional closed molding/compression molding process, except that a stack of the abovementioned resin-soaked panels are used in the place of bulk molding compound (BMC) or sheet mold compound (SMC) “charges.” The applicable MACT definitions are listed below:

Filament application means an open molding process for fabricating composites in which reinforcements are fed through a resin bath and wound onto a rotating mandrel. The materials on the mandrel may be rolled out or worked by using non-mechanical tools prior to curing. Resin application to the reinforcement on the mandrel by means other than the resin bath, such as spray guns, pressure-fed rollers, flow coaters, or brushes is not considered filament application.

Closed molding means a grouping of processes for fabricating composites in a way that HAP-containing materials are not exposed to the atmosphere except during the material loading stage (*e.g.*, compression molding, injection molding, and resin transfer molding). Processes where the mold is covered with plastic (or equivalent material) prior to resin application, and the resin is injected into the covered mold are also considered closed molding.

Compression molding means a closed molding process for fabricating composites in which composite materials are placed inside matched dies that are used to cure the materials under heat and pressure without exposure to the atmosphere. The addition of mold paste or in-mold coating is considered part of the closed molding process. The composite materials used in this process are generally SMC or BMC.

Note how close the definitions match the two different parts of the armor-making process.

Under this circumstance, if Waco Composites can meet the separate MACT requirements for filament winding and compression molding as applies to their process, then the hybrid armor process would be MACT compliant in the aggregate. Frankly, there is no other alternative. Federal EPA is not interested in creating a special classification for Waco Composites armor production.

What MACT Requirements Apply

Filament winding is subject to a specific HAP emission limit in Table 3 to WWW HAP emission limits. Filament winding that uses non-CR/HS resin must emit less than 188 lb HAP emitted per ton resin using the filament winding equation in Table 1 to WWW, which is equivalent to a maximum 45% HAP content resin (187.5 lb/ton). The armor resin used by Waco can easily meet this HAP content limit. There are no MACT HAP emission limits for compression molding.

Accordingly, Waco Composites will use the “**Compliant Material**” compliance option as detailed in §63.5810(a) of the latest August 23, 2015 version of the Composite MACT rule. The Table 1 HAP emission rate for filament winding of 37% styrene content resin is much lower than the HAP emission rate for 45% styrene content resin that corresponds to the Table 3 HAP limit of 188 lb HAP per ton for filament winding of non-corrosion resin. Thus, the material is MACT compliant.

Both Filament winding and compression molding have workpractices requirements listed in Table 4 to WWW. Compression molding has a specific workpractice that involves SMC/BMC charges:

1. A new or existing closed molding operation using compression/injection molding.

Uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting

The stack of uncured armor panels is the “charge” in this case, which is needed to “fill the press” for one cycle. Further, the aluminum plates cover the individual panels, so only one charge is exposed at a time. The existing process seems to meet the intent of the workpractice.

Reinforced Plastic Composites Production

Form OP-UA66 (Page 1)

Federal Operating Permit Program

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

Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
REV 11/20/2024	O4100	RN104363924

Process ID No.	SOP Index No.	Production Process Type	Compliance Option	95% Reduction	Affected Source Type	Facility Type	Large Parts	Operation Type	CMS	Add-On Control Device
EU-1	63WWWW-1	WWWW	5805	95%NO	EXIST	100-			NO	NO
EU-1	63WWWW-2	WWWW	5805	95%NO	EXIST	100-		ONCRFIL	NO	NO

From: Kyle Murray

Sent: Tuesday, October 29, 2024 2:43 PM

To: karen@bullardec.com

Cc: laura@vandlmanagement.com; bob@vandlmanagement.com

Subject: RE: Working Draft Permit -- FOP O4100/Project 36711, Specialty Composites Group LLC / Waco Composites Plant

Good afternoon Karen,

Thank you for your patience while we conducted our analysis regarding your comments on the Applicable Requirements Summary. A revised WDP has been attached and our response to your previous comments can be seen below in blue. I have copied your initial comments for reference. Please provide a response to these comments and the revised WDP by **Friday, November 8th, or sooner if possible.**

- 1. The draft permit Unit Summary and Applicable Requirements tables leave out the closed molding operations linked to the index number 63WWWW-1. These operations are not subject to an emissions limitation, but are subject to the work practice standards. -- Based on my review of our rule analysis, as well as EPA's publications of proposed and final rule language in the federal register, we believed that the rule did not specify requirements for these unit characteristics. Since the "CLSMLD" code for Production Process Type is used, this scenario has been identified as covering centrifugal casting operations considered closed molding that are listed in Table 3.7.b and Table 3.8.b. (You are correct that these do not have emission limits.) § 63.5805(a) also discusses requirements for centrifugal casting operations – and neither (a) nor (a)(1)-(2) mention compliance with work practice standards in Table 4, unlike other citations in this section which mention both Table 3 and 4 for other sources. The heading of Table 4 also states "As specified in § 63.5805, you must meet the work practice standards in the following table that apply to you". It is not clear if the work practice standards in Table 4 apply to this particular operating scenario. Please provide the citations you believe are applicable so that we may review the reasoning.*
- 2. The draft permit labels the thermoset resin operations "MISCELLANEOUS AREA SOURCES OF HAPS." The operations comprise a major source of HAPs at this site (i.e. they are not area sources) and are the operations that trigger the requirement to obtain a Title V operating permit. Please see the existing Unit Summary table (screenshot below), which labels them, "Reinforced Plastic Composites Production." I propose leaving this unchanged. "No changing attributes" would also be appropriate in the last column for EU-1, but the existing text shown below clarifies the two types of thermoset resin operations. – You are correct that the Unit Type should be Reinforced Plastic Composites Production since that is the type assigned to OP-UA66 (The change is reflected in the revised WDP). If we determine from your response to Item 1 that the CLSMLD code scenario DOES have*

requirements, then the Requirement Driver will show the differences in attributes between 63WWWW-1 and 63WWWW-2. If we determine CLSMLD does NOT have requirements, and 63WWWW-2 is the only row in the permit, then it will say “No changing attributes” (as reflected in the revised WDP) because there are no other rows in the permit for this rule with which to compare the answers.

3. *We’d like to request “high-level” requirements for the MACT WWWW and DDDDD requirements. Many facilities are permitted in this manner and the thermoset resin facilities, in particular have many ways of complying with the emission limitations including compliant materials and emissions averaging. This facility uses compliant materials, but they are allowed to change compliance methods in the regulation. The existing applicable requirements table is shown below for your reference. -- High-level language is allowed only on a temporary basis while we are completing our rule analysis. Once our rule analysis is done and the flowchart and form are posted, we must convert to detailed citations. For rules where we do not plan to develop those tools (e.g. if the number of sites with the rule is too small to justify workload), high-level is not used at all and the applicant must provide detailed citations which we review. The reason that MACT WWWW and DDDDD were high-level were because our rule analysis was pending. We have completed that for both rules now. As permits come in for their next renewal (or revision involving WWWW or DDDDD units), we are requesting the form and switching to citations. Therefore, all the permits that have this language will be updated over time.*
4. *This comment applies to The Applicable Requirements table for EU-1, SOP index number 63WWWW-2 of the draft permit in the Emissions Limitations Column. § 63.5895(b) does not apply (i.e. should be deleted), but § 63.5895(c) & (d) do apply (d needs to be added). -- § 63.5895(b) has been removed from both the monitoring and recordkeeping requirement columns. We agree that § 63.5895(c) applies and it is listed in the recordkeeping requirements column. § 63.5895(d) has been added to the recordkeeping and reporting requirements columns.*
5. *This comment applies to the Applicable Requirements table for EU-1, SOP index number 63WWWW-2 of the draft permit in the Reporting Requirements column. [G]§ 63.5912(a) and [G]§ 63.5912(b) do not apply (i.e. should be deleted) -- We agree that [G]§ 63.5912(a) and [G]§ 63.5912(b) do not apply. They have been removed from the WDP.*
6. *This comment applies to the Applicable Requirements table for EU-1 and EU-2, SOP index number 63DDDDD of the draft permit in the Emission Limitations column. [G]§ 63.7540(a)(10) does not apply (i.e. should be deleted), as this section is only applicable to units with heat input capacity of 10 MM Btu per hour or greater. Instead, § 63.7540(a)(12) applies for both boilers, which each have a heat input capacity of less than 1 MM Btu/hr. This comment applies to the same*

reference which appears in the Monitoring column as well. -- You are correct that the frequency in § 63.7540(a)(10) is not applicable to these units. The reason that [G]§ 63.7540(a)(10) is included is because the procedures in the subparagraphs 63.7540(a)(10)(i)-(vi) do apply. They are referenced by § 63.7540(a)(12). Because most units in this rule will at least need all those subparagraphs, and then additionally all the other units with emission limits will also need § 63.7540(a)(10) itself, we chose to use a grouped format § 63.7540(a)(10) for simplicity. This allows us to list [G]§ 63.7540(a)(10) instead of multiple citations. Grouping simply means you would comply with the applicable citations in the group, not that all citations in the group automatically apply. If you would like me to break apart the group and only list the subparagraphs of § 63.7540(a)(10), I can do that, but it is not strictly necessary.

7. *This comment applies to the Applicable Requirements table for EU-1 and EU-2, SOP index number 63DDDDD of the draft permit in the Monitoring column. [G]§ 63.7521(g), (h) and (i) are not applicable, as natural gas is the only fuel. § 63.7521(f) (1) states, “(1) You are not required to conduct the fuel specification analyses in paragraphs (g) through (i) of this section for natural gas or refinery gas.” -- We agree that [G]§ 63.7521(g), (h), and (i) are not applicable for natural gas and they have been removed from the Monitoring column. [G]§ 63.7521(f) has also been removed.*
8. *§ 63.7530(g) and [G]§ 63.7540(c) are also not applicable in the Monitoring column for EU-1 and EU-2 for the same reason as item seven above – natural gas is the fuel. -- § 63.7530(g) and [G]§ 63.7540(c) have been removed from the Monitoring column of the WDP for EU-2 and EU-3, SOP index number 63DDDDD.*
9. *This comment applies to the Applicable Requirements table for EU-1 and EU-2, SOP index number 63DDDDD of the draft permit in the Monitoring column. [G]§ 63.7540(a)(10) does not apply (i.e. should be deleted), as this section is only applicable to units with heat input capacity of 10 MM Btu per hour or greater. Instead, § 63.7540(a)(12) applies for both boilers, which each have a heat input capacity of less than 1 MM Btu/hr. -- See my comments for Item 6 as to what we could change. (Only difference will be that 63.7540(a)(12) does not appear in monitoring/testing. That is because the actual monitoring procedures are found in the subparagraphs of 63.7540(a)(10). 63.7540(a)(12) is just the work practice standard to conduct the tune-up so it only goes in the standards.)*
10. *This comment applies to the Applicable Requirements table for EU-1 and EU-2, SOP index number 63DDDDD of the draft permit in the Recordkeeping column. § 63.7555(g) and § 63.7555(h) do not apply since natural gas is the fuel. We agree that § 63.7555(g) is not applicable for natural gas and the citation has been removed from the Recordkeeping column. For § 63.7555 (h), that is included for operational flexibility since the “unit designed to burn gas 1 subcategory” allows the unit up to 48 hours per year to burn liquid fuel for periodic test of liquid fuel, maintenance or*

operator training, and it also allows the unit to burn liquid fuel during periods of gas curtailment or gas supply interruptions. If this unit will never fire liquid fuel in any circumstance, then this citation can be removed.

11. *This comment applies to the Applicable Requirements table for EU-1 and EU-2, SOP index number 63DDDDD of the draft permit in the Reporting column. [G]§ 63.7521(g) is not applicable, as natural gas is the only fuel. § 63.7521(f) (1) states, “(1) You are not required to conduct the fuel specification analyses in paragraphs (g) through (i) of this section for natural gas or refinery gas.” -- [G]§ 63.7521(g) has been removed from the Reporting column of the WDP for EU-2 and EU-3, SOP index number 63DDDDD.*
12. *[G]§ 63.7545(f) is also not applicable in the Reporting column for EU-1 and Eu2 for the same reason as item eleven above – natural gas is the only fuel. – You are correct that [G]63.7545(f) would not be needed as long as natural gas is being fired. However, the citation describes a situation for using alternative fuel during natural gas curtailment or supply interruption. In other words, this procedure is for a presumably rare and unexpected time when natural gas would not be available. If confirmation can be made an alternative fuel would not be used in that circumstance, then the citation can be removed. Otherwise, it needs to remain in the permit to account for that possibility.*

With regard to Item 1, if you would like a call to discuss the potential requirements before submitting citations, or after, we can certainly do that. Let me know if you have any questions about any of the items above and I would be happy to help. 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: Karen Bullard <karen@bullardec.com>

Sent: Tuesday, August 27, 2024 5:43 PM

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

Subject: RE: Working Draft Permit -- FOP O4100/Project 36711, Specialty Composites Group LLC / Waco Composites Plant

Thanks!

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

Sent: Tuesday, August 27, 2024 3:57 PM

To: karen@bullardec.com

Subject: RE: Working Draft Permit -- FOP O4100/Project 36711, Specialty Composites Group LLC / Waco Composites Plant

Karen,

Thank you for your comments and for including the OP-CRO1 form as well. I will review them and get back to you with any questions or concerns.

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: Karen Bullard <karen@bullardec.com>
Sent: Tuesday, August 27, 2024 2:06 PM
To: Kyle Murray
Cc: 'Laura Simon'; 'Bob Simon'
Subject: Working Draft Permit -- FOP O4100/Project 36711, Specialty Composites Group LLC / Waco Composites Plant
Attachments: doc04585020240822185619.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Kyle,

I've attached the signed OP-CRO1 for the WDP. These are our comments on the draft permit for this facility:

1. The draft permit Unit Summary and Applicable Requirements tables leave out the closed molding operations linked to the index number 63WWWW-1. These operations are not subject to an emissions limitation, but are subject to the work practice standards.
2. The draft permit labels the thermoset resin operations "MISCELLANEOUS AREA SOURCES OF HAPS." The operations comprise a major source of HAPs at this site (i.e. they are not area sources) and are the operations that trigger the requirement to obtain a Title V operating permit. Please see the existing Unit Summary table (screenshot below), which labels them, "Reinforced Plastic Composites Production." I propose leaving this unchanged. "No changing attributes" would also be appropriate in the last column for EU-1, but the existing text shown below clarifies the two types of thermoset resin operations.

Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
EU-1	REINFORCED PLASTIC SITES PRODUCTION	N/A	63WWWW-1	40 CFR Part 63, Subpart WWWW	OPERATION TYPE = CLOSED MOLDING OPERATIONS
EU-1	REINFORCED PLASTIC COMPOSITES PRODUCTION	N/A	63WWWW-2	40 CFR Part 63, Subpart WWWW	OPERATION TYPE = OPEN MOLDING OPERATIONS
EU-2	PROCESS HEATERS/FURNACES	N/A	63DDDDD	40 CFR Part 63, Subpart DDDDD	No changing attributes.
EU-3	PROCESS HEATERS/FURNACES	N/A	63DDDDD	40 CFR Part 63, Subpart DDDDD	No changing attributes.

3. We'd like to request "high-level" requirements for the MACT WWWW and DDDDD requirements. Many facilities are permitted in this manner and the thermoset resin facilities, in particular have many ways of complying with the emission limitations including compliant

materials and emissions averaging. This facility uses compliant materials but they are allowed to change compliance methods in the regulation. The existing applicable requirements table is shown below for your reference.

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
EU-1	PRO	63WWWW-1	112(B) HAPS	40 CFR Part 63, Subpart WWWW	§ 63.5790(a) The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 63, Subpart WWWW	The permit holder shall comply with the applicable requirements of 40 CFR Part 63, Subpart WWWW	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 63, Subpart WWWW	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 63, Subpart WWWW	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 63, Subpart WWWW
EU-1	PRO	63WWWW-2	112(B) HAPS	40 CFR Part 63, Subpart WWWW	§ 63.5790(a) The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 63, Subpart WWWW	The permit holder shall comply with the applicable requirements of 40 CFR Part 63, Subpart WWWW	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 63, Subpart WWWW	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 63, Subpart WWWW	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 63, Subpart WWWW
EU-2	EU	63DDDD	112(B) HAPS	40 CFR Part 63, Subpart DDDD	§ 63.7505 The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 63, Subpart DDDD	The permit holder shall comply with the applicable requirements of 40 CFR Part 63, Subpart DDDD	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 63, Subpart DDDD	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 63, Subpart DDDD	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 63, Subpart DDDD

If high level requirements will not be allowed on this permit, I have the following comments on the draft permit applicable requirements:

4. This comment applies to The Applicable Requirements table for EU-1, SOP index number 63WWWW-2 of the draft permit in the Emissions Limitations Column. § 63.5895(b) does not apply (i.e. should be deleted), but § 63.5895(c) & (d) do apply (d needs to be added).
5. This comment applies to the Applicable Requirements table for EU-1, SOP index number 63WWWW-2 of the draft permit in the Reporting Requirements column. [G]§ 63.5912(a) and [G]§ 63.5912(b) do not apply (i.e. should be deleted)
6. This comment applies to the Applicable Requirements table for EU-1 and EU-2, SOP index number 63DDDD of the draft permit in the Emission Limitations column. [G]§ 63.7540(a)(10) does not apply (i.e. should be deleted), as this section is only applicable to units with heat input capacity of 10 MM Btu per hour or greater. Instead, § 63.7540(a)(12) applies for both boilers, which each have a heat input capacity of less than 1 MM Btu/hr. This comment applies to the same reference which appears in the Monitoring column as well.

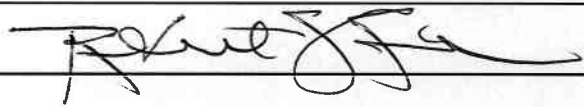
7. This comment applies to the Applicable Requirements table for EU-1 and EU-2, SOP index number 63DDDDDD of the draft permit in the Monitoring column. [G]§ 63.7521(g), (h) and (i) are not applicable, as natural gas is the only fuel. § 63.7521(f) (1) states, “(1) You are not required to conduct the fuel specification analyses in paragraphs (g) through (i) of this section for natural gas or refinery gas.”
8. § 63.7530(g) and [G]§ 63.7540(c) are also not applicable in the Monitoring column for EU-1 and Eu2 for the same reason as item seven above – natural gas is the fuel.
9. This comment applies to the Applicable Requirements table for EU-1 and EU-2, SOP index number 63DDDDDD of the draft permit in the Monitoring column. [G]§ 63.7540(a)(10) does not apply (i.e. should be deleted), as this section is only applicable to units with heat input capacity of 10 MM Btu per hour or greater. Instead, § 63.7540(a)(12) applies for both boilers, which each have a heat input capacity of less than 1 MM Btu/hr.
10. This comment applies to the Applicable Requirements table for EU-1 and EU-2, SOP index number 63DDDDDD of the draft permit in the Recordkeeping column. § 63.7555(g) and § 63.7555(h) do not apply since natural gas is the fuel.
11. This comment applies to the Applicable Requirements table for EU-1 and EU-2, SOP index number 63DDDDDD of the draft permit in the Reporting column. [G]§ 63.7521(g) is not applicable, as natural gas is the only fuel. § 63.7521(f) (1) states, “(1) You are not required to conduct the fuel specification analyses in paragraphs (g) through (i) of this section for natural gas or refinery gas.”
12. [G]§ 63.7545(f) is also not applicable in the Reporting column for EU-1 and Eu2 for the same reason as item eleven above – natural gas is the only fuel.

Please let me know if you have any comments or need to discuss these items.

Thanks,
Karen.

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: 104363924		CN: 605847821		Account No.: MBA009I	
Permit No.: O4100			Project No.: 36711		
Area Name: WACO COMPOSITES PLANT			Company Name: Specialty Composites Group, LLC		
II. Certification Type <i>(Please mark the appropriate box)</i>					
<input checked="" type="checkbox"/> Responsible Official			<input type="checkbox"/> Duly Authorized Representative		
III. Submittal Type <i>(Please mark the appropriate box) (Only one response can be accepted per form)</i>					
<input type="checkbox"/> SOP/TOP Initial Permit Application		<input type="checkbox"/> Update to Permit Application			
<input type="checkbox"/> GOP Initial Permit Application		<input type="checkbox"/> Permit Revision, Renewal, or Reopening			
<input checked="" type="checkbox"/> Other: <u>Comments on WDP</u>					
IV. Certification of Truth					
This certification does not extend to information which is designated by the TCEQ as information for reference only.					
I, <u>Robert Simon</u> certify that I am the <u>RO</u> <div style="text-align: center;"><i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i></div>					
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:					
<i>Note: Enter Either a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>					
Time Period: From _____ to _____ <div style="text-align: center;"><i>Start Date</i> <i>End Date</i></div>					
Specific Dates: <u>08/21/2024</u>					
<i>Date 1</i>		<i>Date 2</i>		<i>Date 3</i>	
<i>Date 4</i>		<i>Date 5</i>		<i>Date 6</i>	
Signature: <u></u> Signature Date: <u>8-21-2024</u>					
Title: <u>COO</u>					

From: Karen Bullard <karen@bullardec.com>
Sent: Wednesday, August 21, 2024 10:55 AM
To: Kyle Murray
Subject: RE: Working Draft Permit -- FOP O4100/Project 36711, Specialty Composites Group LLC / Waco Composites Plant

Thanks!

From: Kyle Murray <Kyle.Murray@tceq.texas.gov>
Sent: Wednesday, August 21, 2024 8:20 AM
To: Karen Bullard <karen@bullardec.com>
Subject: RE: Working Draft Permit -- FOP O4100/Project 36711, Specialty Composites Group LLC / Waco Composites Plant

Yes, that will not be a problem. I will make a note. 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: Karen Bullard <karen@bullardec.com>
Sent: Wednesday, August 21, 2024 5:38 AM
To: Kyle Murray <Kyle.Murray@tceq.texas.gov>
Subject: Re: Working Draft Permit -- FOP O4100/Project 36711, Specialty Composites Group LLC / Waco Composites Plant

Kyle, Could you please extend until next Wednesday? My client will need time to review the information and get back the OPCRO1 to me.

Thanks,
Karen

Sent from my T-Mobile 5G Device
Get [Outlook for Android](#)

From: Kyle Murray <Kyle.Murray@tceq.texas.gov>
Sent: Tuesday, August 20, 2024 2:54:35 PM
To: karen@bullardec.com <karen@bullardec.com>
Subject: RE: Working Draft Permit -- FOP O4100/Project 36711, Specialty Composites Group LLC / Waco Composites Plant

Karen,

No worries. Thank you for letting me know. We can extend the deadline to this Friday (08/23). Let me know if you need more time..

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: Karen Bullard <karen@bullardec.com>
Sent: Tuesday, August 20, 2024 3:08 PM
To: Kyle Murray <Kyle.Murray@tceq.texas.gov>
Subject: RE: Working Draft Permit -- FOP O4100/Project 36711, Specialty Composites Group LLC / Waco Composites Plant

Hi Kyle,

I apologize, but I only today found this working draft permit in my email folders after I searched when you sent your reminder.. Since the company didn't get a copy, we weren't aware of this deadline. I will need a day or two to get the OP-CRO1 back from the client and to review the permit. Thanks for understanding.

Thanks,
Karen.

From: Kyle Murray <Kyle.Murray@tceq.texas.gov>
Sent: Thursday, July 18, 2024 9:16 AM
To: Karen Bullard <karen@bullardec.com>
Subject: Working Draft Permit -- FOP 04100/Project 36711, Specialty Composites Group LLC / Waco Composites Plant

Good morning Ms. Bullard,

I have conducted a technical review of the renewal application for Texas Eastern Transmission LP, Mont Belvieu Compressor Station. 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, August 19, 2024**.

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_facsheet.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: Karen Bullard <karen@bullardec.com>
Sent: Wednesday, July 10, 2024 5:10 PM
To: Kyle Murray
Cc: 'Laura Simon'; 'Bob Simon'; 'Brant Buzbee'
Subject: RE: NOD/RFI: FOP O4100 Specialty Composites Group LLC (Renewal, 36711)
Attachments: Pages from op-req1 h.pdf; OP-PBRSUP form only h.pdf

Kyle,

Here is the remaining information addressing your questions:

1. PBR 106.478 is not in use. Only PBR 106.473 for two small resin storage tanks is in use at this time.
2. The OP-REQ1 has been updated to delete the reference to 106.478. Please see attached page.
3. The OP-PBRSUP has been updated and attached, as requested. The PBRs appear on the appropriate table for each type and monitoring information is given.

Please let me know if you need anything else.

Thanks,
Karen.

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
REV 07/01/2024	O4100	RN104363924

Unit ID No.	Registration No.	PBR No.	Registration Date
N/A			

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
REV 07/01/2024	O4100	RN104363924

Unit ID No.	PBR No.	Version No./Date
EU-2	106.183	09/04/2000
EU-3	106.183	09/04/2000
EU-4	106.227	09/04/2000
EU-5	106.265	09/04/2000
EU-6	106.473	09/04/2000

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

Date	Permit Number	Regulated Entity Number
REV 07/01/2024	O4100	RN104363924

PBR No.	Version No./Date
106.102	09/04/2000
106.103	09/04/2000

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

Date	Permit Number	Regulated Entity Number
REV 07/01/2024	O4100	RN104363924

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
EU-2	106.183	09/04/2000	Records maintained showing the max heat input is 40 MMBtu/hr for boilers.
EU-3	106.183	09/04/2000	Records showing fuel usage will also be maintained monthly. Calculation
			of annual emissions of products of combustion on a rolling 12 month basis.
EU-4	106.227	09/04/2000	Records will be maintained of solder material usage/purchase. Lead emissions
			can be estimated from these materials, but the overall usage rate of the materials
			be less than the allowed 0.6 tons/yr of lead emissions, proving compliance.
EU-5	106.265	09/04/2000	Records of equipment will be maintained showing they are handheld. Annual
			emissions can be estimated from the amount of material throughput in permitted
			operations that is processed with this equipment.
EU-6	106.473	09/04/2000	Records of monthly throughput can be used to calculate air emissions on a

rolling 12 month basis using current emission factors. Documentation of tank capacity will show the tank capacity is less than the daily throughput limit, ensuring compliance. Records of materials received will show only liquid resins are received, as allowed.

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

Date:	01/18/2024 rev 07/01/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 88	
XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)	
◆ I. Permits by Rule (30 TAC Chapter 106) for the Application Area	
<i>A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.</i>	
PBR No.: 106.183	Version No./Date: 09/04/2000
PBR No.: 106.227	Version No./Date: 09/04/2000
PBR No.: 106.265	Version No./Date: 09/04/2000
PBR No.: 106.473	Version No./Date: 09/04/2000
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
◆ J. Municipal Solid Waste and Industrial Hazardous Waste Permits With an Air Addendum	
Permit No.:	Issuance Date:
Permit No.:	Issuance Date:
Permit No.:	Issuance Date:
Permit No.:	Issuance Date:

From: Karen Bullard <karen@bullardec.com>
Sent: Monday, July 1, 2024 5:57 PM
To: Kyle Murray
Subject: RE: NOD/RFI: FOP O4100 Specialty Composites Group LLC (Renewal, 36711)
Attachments: FORM ONLY op ua66 REV070124.pdf; op ua5 REV 070124.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Kyle,

Please see replies below in red and attachments. We will follow up tomorrow.

Thanks,
Karen.

From: Kyle Murray <Kyle.Murray@tceq.texas.gov>
Sent: Friday, June 21, 2024 3:42 PM
To: karen@bullardec.com
Subject: NOD/RFI: FOP O4100 Specialty Composites Group LLC (Renewal, 36711)

Good afternoon Ms. Bullard,

Upon evaluation of your federal operating permit application, we have determined that additional information is necessary to complete our review. Below is a list of permit application deficiencies which must be resolved by **Monday, July 1, 2024**.

- **Form OP-UA5**
 - For SOP index numbers, we prefer that the index number reflect the regulation for which it is used. On Table 2 (Chapter 112, Sulfur Compounds), for units EU-2 and EU-3, 63DDDDD was selected. Our standard index number format for this rule would begin R200 (from Chapter 112's original rule name, Regulation 2) or R112 is also acceptable. You can use these prefixes alone or with additional numbers after (R200-xx, R112-xx). Please update the SOP index numbers on this table. **These boilers are natural-gas fired heaters and not liquid fuel fired and so this regulation actually doesn't apply and this table can be deleted from this application.**
 - Similarly, on Table 4 (Chapter 111, Incineration), 63DDDDD was also used for units EU-2 and EU-3. Our standard format would begin R1121. Please update the SOP index numbers on this table. **Since these boilers are not used for burning hazardous waste, this regulation also doesn't apply. However, the revised table for this item with your requested index number is attached. Since there are no applicable requirements**

associated with this index number, it looks like it wasn't required in the previous application.

- **Form OP-UA66 Table 1a**

- According to our OP-UA66 form instructions, the column "Large Parts" should only be filled out if "Affected Source Type" is "NEW". Subsequently, the entry for "Operation Type", "CLSMLD", is not an acceptable answer choice and should be revised. The two columns proceeding, "CMS" and "Add-On Control Device", should also be filled out for SOP Index No. 63WWWW-1. Please review and update these entries for unit EU-1 to match the form instructions. **For Index number 63WWWW-1 the CLSMLD designation should occur in the third column and then no further information is required. The revised table is attached.**

- **Form OP-PBR SUP | Form OP-REQ1 Page 88** - Please review and update these rules on the OP-REQ1 and OP-PBR SUP forms. As a note, the OP-PBR SUP should be submitted as a set, even if there are no changes to a given table. Please re-submit all four tables together and also re-date them. If any tables are blank, you can mark an N/A in the first row. This way it is clear the table was not mistakenly omitted.

- PBR 106.478/09/04/2000 is listed on the OP-REQ1 and in our database but not on the OP-PBR SUP.
- Our NSR database shows this site has one active PBR registration, PBR Registration No. 72960. However, Table A of the OP-PBR SUP, which is for registered PBRs, was not included. If the registration is still in use, please identify the appropriate units on Table A and please add any PBRs needed to the OP-REQ1. If the registration is no longer used, please submit a request in STEERS to void the PBR registration at your convenience.

That PBR registration is no longer in use since the facility began to operate under NSR permit. A request to void the registration will be submitted via STEERS.

- Table C included 106.227, 106.265, and 106.473. However, per the OP-PBR SUP instructions, these PBRs would go on Table A, if registered, or Table B, if unregistered. Table C is only for PBRs that are not required to be listed on the first two tables.
- Any PBRs that are added to Tables A or B to address the above issues should also be added to Table D.

We are working on the PBR SUP table and get that to you tomorrow.

Thank you for your cooperation in this matter. Please contact me 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



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

**Process Heater/Furnace Attributes
Form OP-UA5 (Page 7)
Federal Operating Permit Program
Table 4: Title 30 Texas Administrative Code Chapter 111 (30 TAC Chapter 111)
Subchapter A, Division 2: Incineration
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
REV 07/01/2024	O4100	RN104363924

Unit ID No.	SOP/GOP Index No.	Hazardous Waste	Monitor
EU-2	R112-1	NO	
EU-3	R112-1	NO	

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

Date	Permit No.	Regulated Entity No.
REV 07/01/2024	O4100	RN104363924

Unit ID No.	SOP/GOP Index No.	Commence	Table Applicability	HCl Emission	HCl-CMS
EU-2	63DDDDDD	EXIST	T3.1G1		
EU-3	63DDDDDD	NEW	T3.1G1		

Reinforced Plastic Composites Production

Form OP-UA66 (Page 1)

Federal Operating Permit Program

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

Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
REV 07/01/2024	O4100	RN104363924

Process ID No.	SOP Index No.	Production Process Type	Compliance Option	95% Reduction	Affected Source Type	Facility Type	Large Parts	Operation Type	CMS	Add-On Control Device
EU-1	63WWWW-1	CLSMLD								
EU-1	63WWWW-2	WWWW	5805	95%NO	EXIST	100-		ONCRFIL	NO	NO

From: Karen Bullard <karen@bullardec.com>
Sent: Tuesday, June 18, 2024 12:11 PM
To: Kyle Murray
Cc: 'Laura Simon'; 'Bob Simon'; 'Brant Buzbee'
Subject: RE: Technical Review -- FOP O4100/Project 36711, Specialty Composites Group LLC / Waco Composites Plant

Kyle,

We believe the permit application is complete, as submitted. Please let me know if you need anything or have questions.

Thanks,
Karen.

From: Kyle Murray <Kyle.Murray@tceq.texas.gov>
Sent: Tuesday, June 18, 2024 9:09 AM
To: karen@bullardec.com
Subject: Technical Review -- FOP O4100/Project 36711, Specialty Composites Group LLC / Waco Composites Plant

Good morning,

I have been assigned to the Federal Operating Permit (FOP) renewal application of Permit No. O4100 for Specialty Composites Group LLC, Waco Composites Plant. This application has been assigned Project No. 36711. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

In addition, I wanted to let you know that EPA has, on occasion, objected to Title V permits based on the following:

- a. NSR permit and PBR monitoring sufficiency – please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient.
- b. Reference to confidential business information (CBI) in NSR permits and PBR submittals.
- c. High level terms in the SOP Applicable Requirement Summary Table.
The high-level terms are sometimes used in SOPs when unit attribute forms have not yet been updated due to regulatory amendments.
- d. Accuracy of PBR information provided on the supplemental table and in the permit – please refer to Forms OP-PBR SUP 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](#).

Optional: Request any information that may have been noted as deficient or out-of-date during a preliminary project review (e.g. OP-1 with current contact data, current OP-REQ1, etc.), and include a deadline.

Please review the “SOP Technical Review Fact Sheet” located at http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_facsheet.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

From: [Rhyan Stone](#)
To: [Johnny Bowers](#)
Cc: [Jesse Chacon](#)
Subject: RE: Title V Air Permit Renewal Submittal
Date: Thursday, June 6, 2024 12:55:50 PM
Attachments: [image001.png](#)

Good afternoon Johnny,

Since it looks like the error was on our end and the COR has the 01/18/2024 submittal timestamp, I think we can process this application as timely. Like you said, the applicant will need to submit their application directly to APIRT and then we can process it once its been coordinated.

Thanks,
Rhyan

From: Johnny Bowers <johnny.bowers@tceq.texas.gov>
Sent: Thursday, June 6, 2024 11:34 AM
To: Rhyan Stone <Rhyan.Stone@tceq.texas.gov>
Cc: Jesse Chacon <jesse.chacon@tceq.texas.gov>
Subject: FW: Title V Air Permit Renewal Submittal
Importance: High

Good morning Rhyan,

The applicant received the attached notification that the renewal application for permit 4100 on January 18, 2024. They checked recently and it appears the STEERs application was reset. This usually occurs when there was an issue on our end. Since the 6 month submittal deadline has past, then cannot resubmit via STEERs and we will have to manually process it. The permit expiration date is 7/18/2024.

Please advise.

Thanks,

Johnny Bowers, Team Leader
Air Permits Initial Review Team
Air Permits Division, MC 161
Office of Air
Texas Commission on Environmental Quality
Phone: (512) 239-6770
Fax: (512) 239-1070
E-mail: johnny.bowers@tceq.texas.gov
Web site: www.tceq.texas.gov

Please consider whether it is necessary to print this e-mail

How are we doing? www.tceq.texas.gov/customersurvey



From: Karen Bullard <karen@bullardec.com>
Sent: Thursday, June 6, 2024 10:31 AM
To: Johnny Bowers <johnny.bowers@tceq.texas.gov>
Subject: Title V Air Permit Renewal Submittal
Importance: High

Hi Johnny,

As we discussed, my client submitted their Title V Air Permit Renewal on STEERS in January. We are familiar with the two-step process where you have to sign and then go back and submit. After he signed it, I advised him to go back and repeat the steps to submit. The client then said he had done that but the system gave him a message I am unfamiliar with that said it “was received for submission but not processed yet”. I logged into STEERS and checked the submission history logs and the attached is a copy of that log. Since this looks identical to the submission log for other Title V renewals I submitted in the fall, I was confident that it had been submitted.

However, yesterday I checked the permits database and the renewal is not logged as received. When I log into STEERS, the application now shows up in my Activities section and is in the “ready to submit” state. I’m concerned that this permit is past the six month timely renewal window for submittal and we need to help this company maintain compliance. The permit is not expired yet, so that is a positive aspect. Please let me know what should be done for this situation. Thank you for your assistance.

All of the identifying information for the company and permit is present on the attached receipt.

Thanks,
Karen.

Karen M. Bullard, P.E.
Engineering Partner
karen@bullardec.com

Bullard Environmental Consulting, Inc.
Engineering and Environmental Compliance Services
260 E. Ridgewood Road
Georgetown, Texas 78633

(737) 500-6048 (cell)
(512) 659-3228 (secondary)

+++++Engineering Work Product Notice+++++

The information in this e-mail may be draft work product and is released for the purpose of interim review only under the authority of Karen M. Bullard, P.E. License No. 88449. It is not to be used for construction, bidding, or permit purposes. Bullard Environmental Consulting, Inc. F-4988.

*******CONFIDENTIALITY NOTICE*******

The information in this email may be confidential and/or privileged. This email is intended to be reviewed by only the individual or organization named above. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this email and its attachments, if any, or the information contained herein is prohibited. If you have received this email in error, please immediately notify the sender by return email and delete this email from your system.

Thank You.

From: [eNotice TCEQ](#)
To: brian.birdwell@senate.texas.gov; Charles.anderson@house.texas.gov
Subject: TCEQ Notice - Permit Number O4100
Date: Friday, June 7, 2024 11:19:47 AM
Attachments: [TCEQ Notice - O4100_36711.pdf](#)

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

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

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

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

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

June 7, 2024

THE HONORABLE BRIAN BIRDWELL
TEXAS SENATE
PO BOX 12068
AUSTIN TX 78711-2068

Re: Accepted Federal Operating Permit Renewal Application
Project Number: 36711
Permit Number: O4100
Specialty Composites Group, LLC
Waco Composites Plant
Waco, McLennan County
Regulated Entity Number: RN104363924
Customer Reference Number: CN605847821

Dear Senator Birdwell:

This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) renewal application for a site located in your district. As part of this permitting process, the applicant is required to publish a formal newspaper public notice. The notice will inform the public of their right to make comments or request a public hearing. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. <https://gisweb.tceq.texas.gov/LocationMapper/?marker=-97.15,31.536388&level=13>.

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

The Honorable Brian Birdwell
Page 2
June 7, 2024

Re: Accepted Federal Operating Permit Renewal Application

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

Sincerely,

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

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

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

June 7, 2024

THE HONORABLE CHARLES ANDERSON
TEXAS HOUSE OF REPRESENTATIVES
PO BOX 2910
AUSTIN TX 78768-2910

Re: Accepted Federal Operating Permit Renewal Application
Project Number: 36711
Permit Number: O4100
Specialty Composites Group, LLC
Waco Composites Plant
Waco, McLennan County
Regulated Entity Number: RN104363924
Customer Reference Number: CN605847821

Dear Representative Anderson:

This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) renewal application for a site located in your district. As part of this permitting process, the applicant is required to publish a formal newspaper public notice. The notice will inform the public of their right to make comments or request a public hearing. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. <https://gisweb.tceq.texas.gov/LocationMapper/?marker=-97.15,31.536388&level=13>.

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

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

Sincerely,

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

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

Texas Commission on Environmental Quality

Title V Existing

4100

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	WACO COMPOSITES PLANT
Does the site have a physical address?	Yes
Physical Address	
Number and Street	302 S 27TH ST
City	WACO
State	TX
ZIP	76710
County	MCLENNAN
Latitude (N) (##.#####)	31.536388
Longitude (W) (-###.#####)	97.15
Primary SIC Code	3089
Secondary SIC Code	
Primary NAICS Code	326199
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN104363924
What is the name of the Regulated Entity (RE)?	WACO COMPOSITES PLANT
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	302 S 27TH ST
City	WACO
State	TX
ZIP	76710
County	MCLENNAN
Latitude (N) (##.#####)	31.536388
Longitude (W) (-###.#####)	-97.15
Facility NAICS Code	
What is the primary business of this entity?	MANUFACTURE OF COMPOSITE PANELS

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN605847821
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Specialty Composites Group, LLC
Texas SOS Filing Number	803505413
Federal Tax ID	
State Franchise Tax ID	17429824026
State Sales Tax ID	
Local Tax ID	
DUNS Number	
Number of Employees	21-100
Independently Owned and Operated?	Yes

Responsible Official Contact

Person TCEQ should contact for questions about this application:	
Organization Name	Specialty Composites Group LLC
Prefix	MR
First	Robert
Middle	
Last	Simon
Suffix	
Credentials	
Title	COO
Enter new address or copy one from list:	RE Physical Address
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	302 S 27TH ST
Routing (such as Mail Code, Dept., or Attn:)	
City	WACO
State	TX
ZIP	76710

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

2547523622

Extension

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

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

E-mail

bob@vandlmanagement.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

New Contact

Organization Name

Bullard Environmental Consulting Inc

Prefix

MS

First

Karen

Middle

Last

Bullard

Suffix

Credentials

PE

Title

Engineering Partner

Enter new address or copy one from list:

Mailing Address

Address Type

Domestic

Mailing Address (include Suite or Bldg. here, if applicable)

260 E RIDGEWOOD RD

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

City

GEORGETOWN

State

TX

ZIP

78633

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

7375006048

Extension

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

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

E-mail

karen@bullardec.com

Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

31 Deg 32 Min 11 Sec

3) Permit Longitude Coordinate:	97 Deg 9 Min 0 Sec
4) Is this submittal a new application or an update to an existing application?	New Application
4.1. What type of permitting action are you applying for?	Renewal
4.1.1. Are there any permits that should be voided upon issuance of this permit application through permit conversion?	No
4.1.2. Are there any permits that should be voided upon issuance of this permit application through permit consolidation?	No
5) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

[File Properties]

File Name	OP_1_op-1 h.pdf
Hash	FE66751A93096CFC85A76211BA12979A9C7BE9ECCE6F1F178179871185407B94
MIME-Type	application/pdf

Attach OP-2 (Application for Permit Revision/Renewal)

[File Properties]

File Name	OP_2_op-2 h.pdf
Hash	D44E5979AB6BA25522832E95DA53DA02F3379354B7CFFDB6794D8BFA0A1155A0
MIME-Type	application/pdf

Attach OP-ACPS (Application Compliance Plan and Schedule)

[File Properties]

File Name	OP-ACPS h.pdf
Hash	538B1E39D67B541A465D95B82CEC5273AFD7665AB0DB25D2F4FFDC6FDBC1A215
MIME-Type	application/pdf

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

[File Properties]

File Name	OP_REQ1_op-req1 hh.pdf
-----------	---

Hash 035A0D2EEFF62A147E7A4E47BC197B3C96E3C24290C9124497A638015792E5CB
MIME-Type application/pdf

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

[File Properties]

File Name OP_PBRSUP_op-pbr sup h.pdf

Hash 9BCA7C142D522F12E5CF04F0F05A41BD48E7667DE653507A423547734F29BB78
MIME-Type application/pdf

Attach OP-SUMR (Individual Unit Summary for Revisions)

[File Properties]

File Name OP_SUMR_opsum h.pdf

Hash 5A2BED35E79929F3773B58D3AAC46FEEE56F32ABB09701800B386ABB3F75BAD6
MIME-Type application/pdf

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

[File Properties]

File Name FORM ONLY op ua66.pdf

Hash 46FF43EBDFA04960F74EEABA66126E8743820748AF5B01B129761312A698B2AC
MIME-Type application/pdf

[File Properties]

File Name op ua5.pdf

Hash 895D3C27FFDC9464B4B0D7FE99B50898A5B1F7F5F7DA7066E5CDDD4EB9A94FD0
MIME-Type application/pdf

If applicable, attach OP-AR1 (Acid Rain Permit Application)

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name

[Waco Composites plant 2024 SOP renewal application no forms.pdf](/ePermitsExternal/faces/file?fileId=178727)

Hash

A2439FB60447353C9EEF3EE297675F003097471A3C904747B887CBD8CC7FD5C2

MIME-Type

application/pdf

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

[File Properties]

File Name

[Area Map h.pdf](/ePermitsExternal/faces/file?fileId=178728)

Hash

E71C022F0D5E35B3D7012035E29D093DA35E2202294B7CCB94951B2CF20909AE

MIME-Type

application/pdf

[File Properties]

File Name

[Plot Plan h.pdf](/ePermitsExternal/faces/file?fileId=178729)

Hash

41C4DADD5322C10798486805A40BCC26D99DBDFFB22418DC92F45BD5FB168B796

MIME-Type

application/pdf

Expedite Title V

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

No

Certification

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

1. I am Robert S Simon, the owner of the STEERS account ER017288.
2. I have the authority to sign this data on behalf of the applicant named above.
3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.

- 4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
- 5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
- 6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
- 7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
- 8. I am knowingly and intentionally signing Title V Existing 4100.
- 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: Robert S Simon OWNER OPERATOR

Account Number:	ER017288
Signature IP Address:	98.6.217.179
Signature Date:	2024-01-18
Signature Hash:	A908BB06290D612C955533344263377BC8D5C2405757C49096A0938FEC863237
Form Hash Code at time of Signature:	2D2EAE4675A0A46E08B3538F62F8E05793E77698CE5C925E4657AB0A5249C978

Submission

Reference Number:	The application reference number is 616451
Submitted by:	The application was submitted by ER017288/Robert S Simon
Submitted Timestamp:	The application was submitted on 2024-01-18 at 13:38:49 CST
Submitted From:	The application was submitted from IP address 98.6.217.179
Confirmation Number:	The confirmation number is 511151
Steers Version:	The STEERS version is 6.73
Permit Number:	The permit number is 4100

Additional Information

Application Creator: This account was created by Karen M. Bullard

BEC Bullard Environmental Consulting, Inc.
Engineering and Environmental Compliance Services

January 18, 2024

Online STEERs to TCEQ and USPS Mail

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

Re: Specialty Composites Group, LLC

Waco Composites Plant
Renewal of Site Operating Permit No. O4100
Regulated Entity Number: RN104363924
Customer Reference Number: CN605847821
Waco, McLennan County

To Whom It May Concern:

On behalf of Specialty Composites Group LLC, Waco Composites Plant, I am submitting this request for renewal of Federal Site Operating Permit (SOP) No. O4100 for their fiberglass reinforced plastic composite armor plate manufacturing facility in Giddings, Texas. Please note that there have been no changes in operation since the SOP was issued.

This package also contains the following forms required for renewal:

- OP-2
- OP-1
- OP-CRO1
- OP-REQ1
- OP-ACPS
- OP-SUM
- OP-PBRSUP
- OP-UA5
- OP-UA66
- Area Map and Plot Plan
- Process Description

If you have any questions regarding this material, please contact me via e-mail at karen@bullardec.com or by phone at (737) 500-6048.

Sincerely,



Karen M. Bullard, P.E.
Engineering Partner
Bullard Environmental Consulting

cc: TCEQ Region 9, Waco, Texas, w/enclosures
Mr. Bob Simon, Specialty Composites Group, LLC, Waco, Texas, w/enclosures
US EPA, Region 6, Dallas, Texas, w/enclosures

Texas Commission on Environmental Quality Renewal of Site Operating Permit No. 04100

for

**Specialty Composites Group LLC
Waco Composites Plant
Regulated Entity Number: RN104363924
Customer Reference Number: CN605847821
McLennan County, Texas**

January 18, 2024

Prepared by:



**Karen M. Bullard, P.E.
Engineering Partner**

Attachment I
Form OP-2 - Application for Permit Revision/Renewal

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

Date: 01/18/2024	
Permit No.: O4100	
Regulated Entity No.: RN104363924	
Company Name: SPECIALTY COMPOSITES GROUP LTD	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
I. Application Type	
Indicate the type of application:	
<input checked="" type="checkbox"/> Renewal	
<input type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
<input type="checkbox"/> Significant Revision	
<input type="checkbox"/> Revision Requesting Prior Approval	
<input type="checkbox"/> Administrative Revision	
<input type="checkbox"/> Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only	<input type="checkbox"/> YES <input type="checkbox"/> NO
For GOP Revisions Only	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

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

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

☐ VOC ☐ NO_x ☐ SO₂ ☐ PM₁₀ ☐ CO ☐ Pb ☒ HAP

Other:

IV. Reference Only Requirements (For reference only)

Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)? ☒ YES ☐ NO ☐ N/A

V. Delinquent Fees and Penalties

Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.

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

Date:	
Permit No.: 04100	
Regulated Entity No.: RN104363924	
Company Name: SPECIALTY COMPOSITES GROUP LTD	
I. Significant Revision <i>(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)</i>	
A. Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
B. Indicate the alternate language(s) in which public notice is required: Spanish	
C. Will, there be a change in air pollutant emissions as a result of the significant revision?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

Attachment II
Form OP-1 - Site Information Summary

**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: Specialty Composites Group LLC
B. Customer Reference Number (CN): CN 605847821
C. Submittal Date (mm/dd/yyyy): 01/18/2024
II. Site Information
A. Site Name: Waco Composites Plant
B. Regulated Entity Reference Number (RN): RN 104363924
C. Indicate affected state(s) required to review permit application: <i>(Check the appropriate box[es].)</i>
<input type="checkbox"/> AR <input type="checkbox"/> CO <input type="checkbox"/> KS <input type="checkbox"/> LA <input type="checkbox"/> NM <input type="checkbox"/> OK <input checked="" type="checkbox"/> N/A
D. Indicate all pollutants for which the site is a major source based on the site's potential to emit: <i>(Check the appropriate box[es].)</i>
<input type="checkbox"/> VOC <input type="checkbox"/> NO _x <input type="checkbox"/> SO ₂ <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> CO <input type="checkbox"/> Pb <input checked="" type="checkbox"/> HAPS
Other:
E. Is the site a non-major source subject to the Federal Operating Permit Program? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
F. Is the site within a local program area jurisdiction? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
G. Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
H. Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:
III. Permit Type
A. Type of Permit Requested: <i>(Select only one response)</i>
<input checked="" type="checkbox"/> Site Operating Permit (SOP) <input type="checkbox"/> Temporary Operating Permit (TOP) <input type="checkbox"/> General Operating Permit (GOP)

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

IV. Initial Application Information <i>(Complete for Initial Issuance Applications Only.)</i>
A. Is this submittal an abbreviated or a full application? <input type="checkbox"/> Abbreviated <input checked="" type="checkbox"/> Full
B. If this is a full application, is the submittal a follow-up to an abbreviated application? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
C. If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
D. Has an electronic copy of this application been submitted (or is being submitted) to EPA? (Refer to the form instructions for additional information.) <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
E. Has the required Public Involvement Plan been included with this application? NA <input type="checkbox"/> YES <input type="checkbox"/> NO
V. Confidential Information
A. Is confidential information submitted in conjunction with this application? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
VI. Responsible Official (RO) Identifying Information
RO Name Prefix: (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
RO Full Name: Robert Simon
RO Title: COO
Employer Name: Specialty Composites Group LLC
Mailing Address: PO BOX 20008
City: Waco
State: TX
ZIP Code: 76702
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (254) 752-3622
Fax No.:
Email: bob@vandlmanagement.com

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

VII. Technical Contact Identifying Information <i>(Complete if different from RO.)</i>
Technical Contact Name Prefix: (<input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input checked="" type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Technical Contact Full Name: Karen M. Bullard
Technical Contact Title: Engineering Partner
Employer Name: Bullard Environmental Consulting, Inc.
Mailing Address: 260 E. Ridgewood Road
City: Georgetown
State: TX
ZIP Code: 78633
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (737) 500-6048
Fax No.:
Email: karen@bullardec.com
VIII. Reference Only Requirements <i>(For reference only.)</i>
A. State Senator: Brian Birdwell, District 22
B. State Representative: Charles Anderson, District 56
C. Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
D. Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
E. Indicate the alternate language(s) in which public notice is required: Spanish

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

IX. Off-Site Permit Request <i>(Optional for applicants requesting to hold the FOP and records at an off-site location.)</i>
A. Office/Facility Name:
B. Physical Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
C. Physical Location:
D. Contact Name Prefix: (<input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Contact Full Name:
E. Telephone No.:
X. Application Area Information
A. Area Name: Waco Composites Plant
B. Physical Address: 302 S 27TH ST
City: Waco
State: TX
ZIP Code: 76710
C. Physical Location:
D. Nearest City: Waco
E. State: TX
F. ZIP Code: 76710

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

X. Application Area Information (continued)
G. Latitude (nearest second): 31° 32' 11"
H. Longitude (nearest second): 97° 9' 0"
I. Are there any emission units that were not in compliance with the applicable requirements identified in the application at the time of application submittal? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
J. Indicate the estimated number of emission units in the application area: 4
K. Are there any emission units in the application area subject to the Acid Rain Program? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
XI. Public Notice (Complete this section for SOP Applications and Acid Rain Permit Applications only.)
A. Name of a public place to view application and draft permit:
B. Physical Address: 1717 Austin Avenue City: Waco ZIP Code: 76701
C. Contact Person (Someone who will answer questions from the public during the public notice period): Contact Name Prefix: (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.): Contact Person Full Name: Bob Simon Contact Mailing Address: PO BOX 20008 City: Waco State: TX ZIP Code: 76702 Territory: Country: McClennan Foreign Postal Code: Internal Mail Code: Telephone No.: (254) 752-3622

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 6)
Texas Commission on Environmental Quality**

XII. Delinquent Fees and Penalties

Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of Attorney General on behalf of the TCEQ are paid in accordance with the "Delinquent Fee and Penalty Protocol."

Complete Sections XIII and XIV for Acid Rain Permit and CSAPR applications only. Please include a copy of the Certificate of Representation submitted to EPA.

XIII. Designated Representative (DR) Identifying Information

DR Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)

DR Full Name:

DR Title:

Employer Name:

Mailing Address:

City:

State:

ZIP Code:

Territory:

Country:

Foreign Postal Code:

Internal Mail Code:

Telephone No.:

Fax No.:

Email:

**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.:

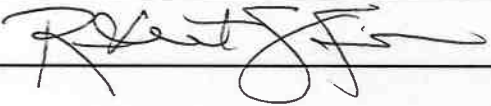
Fax No.:

Email:

Attachment III
Form OP-CRO1 - Certification by Responsible Official

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: 104363924		CN: 605847821		Account No.: MBA009I	
Permit No.: O4100			Project No.: NA		
Area Name: WACO COMPOSITES PLANT			Company Name: Specialty Composites Group, LLC		
II. Certification Type <i>(Please mark the appropriate box)</i>					
<input checked="" type="checkbox"/> Responsible Official			<input type="checkbox"/> Duly Authorized Representative		
III. Submittal Type <i>(Please mark the appropriate box) (Only one response can be accepted per form)</i>					
<input type="checkbox"/> SOP/TOP Initial Permit Application		<input type="checkbox"/> Update to Permit Application			
<input type="checkbox"/> GOP Initial Permit Application		<input checked="" type="checkbox"/> Permit Revision, Renewal, or Reopening			
<input type="checkbox"/> Other: _____					
IV. Certification of Truth					
This certification does not extend to information which is designated by the TCEQ as information for reference only.					
I, <u>Robert Simon</u> certify that I am the <u>RO</u> <div style="text-align: center;"><i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i></div>					
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:					
<i>Note: Enter Either a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>					
Time Period: From _____ to _____ <div style="text-align: center;"><i>Start Date</i> <i>End Date</i></div>					
Specific Dates: <u>01/17/2024</u> <div style="text-align: center;"><i>Date 1</i> <i>Date 2</i> <i>Date 3</i> <i>Date 4</i> <i>Date 5</i> <i>Date 6</i></div>					
Signature: <u></u> Signature Date: <u>1-17-2024</u>					
Title: <u>COO</u>					

Attachment IV
Form OP-REQ1 - Application Area-Wide Applicability Determinations
and General Information

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 2

I. Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter (continued)

B. Materials Handling, Construction, Roads, Streets, Alleys, and Parking Lots

1. Items a - d determines applicability of any of these requirements based on geographical location.

◆	a. The application area is located within the City of El Paso.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	b. The application area is located within the Fort Bliss Military Reservation, except areas specified in 30 TAC § 111.141.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	c. The application area is located in the portion of Harris County inside the loop formed by Beltway 8.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	d. The application area is located in the area of Nueces County outlined in Group II state implementation plan (SIP) for inhalable particulate matter adopted by the TCEQ on May 13, 1988.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

If there is any "YES" response to Questions I.B.1.a - d, answers Questions I.B.2.a - d. If all responses to Questions I.B.1.a-d are "NO," go to Section I.C.

2. Items a - d determine the specific applicability of these requirements.

◆	a. The application area is subject to 30 TAC § 111.143.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	b. The application area is subject to 30 TAC § 111.145.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	c. The application area is subject to 30 TAC § 111.147.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	d. The application area is subject to 30 TAC § 111.149.	<input type="checkbox"/> YES <input type="checkbox"/> NO

C. Emissions Limits on Nonagricultural Processes

◆	1. The application area includes a nonagricultural process subject to 30 TAC § 111.151.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	2. The application area includes a vent from a nonagricultural process that is subject to additional monitoring requirements. <i>If the response to Question I.C.2 is "NO," go to Question I.C.4.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	3. All vents from nonagricultural process in the application area are subject to additional monitoring requirements.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 3

I. Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter (continued)

C. Emissions Limits on Nonagricultural Processes (continued)

4.	The application area includes oil or gas fuel-fired steam generators subject to 30 TAC §§ 111.153(a) and 111.153(c).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
5.	The application area includes oil or gas fuel-fired steam generators that are subject to additional monitoring requirements. <i>If the response to Question I.C.5 is "NO," go to Question I.C.7.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
6.	All oil or gas fuel-fired steam generators in the application area are subject to additional monitoring requirements.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7.	The application area includes solid fossil fuel-fired steam generators subject to 30 TAC §§ 111.153(a) and 111.153(b).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
8.	The application area includes solid fossil fuel-fired steam generators that are subject to additional monitoring requirements. <i>If the response to Question I.C.8 is "NO," go to Section I.D.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
9.	All solid fossil fuel-fired steam generators in the application area are subject to additional monitoring requirements.	<input type="checkbox"/> YES <input type="checkbox"/> NO

D. Emissions Limits on Agricultural Processes

1.	The application area includes agricultural processes subject to 30 TAC § 111.171.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
----	---	---

E. Outdoor Burning

◆ 1.	Outdoor burning is conducted in the application area. <i>If the response to Question I.E.1 is "NO," go to Section II.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆ 2.	Fire training is conducted in the application area and subject to the exception provided in 30 TAC § 111.205.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 3.	Fires for recreation, ceremony, cooking, and warmth are used in the application area and subject to the exception provided in 30 TAC § 111.207.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 4.	Disposal fires are used in the application area and subject to the exception provided in 30 TAC § 111.209.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 5

III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)

C. Industrial Wastewater

1.	The application area includes affected VOC wastewater streams of an affected source category, as defined in 30 TAC § 115.140. <i>If the response to Question III.C.1 is "NO" or "N/A," go to Section III.D.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
2.	The application area is located at a petroleum refinery in the Beaumont/Port Arthur or Houston/Galveston/Brazoria area. <i>If the response to Question III.C.2 is "YES" and the refinery is in the Beaumont/Port Arthur area, go to Section III.D.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3.	The application area is complying with the provisions of 40 CFR Part 63, Subpart G, as an alternative to complying with this division (relating to Industrial Wastewater). <i>If the response to Question III.C.3 is "YES," go to Section III.D.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4.	The application area is located at a plant with an annual VOC loading in wastewater, as determined in accordance with 30 TAC § 115.148, less than or equal to 10 Mg (11.03 tons). <i>If the response to Question III.C.4 is "YES," go to Section III.D.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
5.	The application area includes wastewater drains, junction boxes, lift stations, or weirs that are subject to the control requirements of 30 TAC § 115.142(1).	<input type="checkbox"/> YES <input type="checkbox"/> NO
6.	The application area includes wastewater drains, junction boxes, lift stations, or weirs that handle streams chosen for exemption under 30 TAC § 115.147(2).	<input type="checkbox"/> YES <input type="checkbox"/> NO
7.	The application area includes wastewater drains, junction boxes, lift stations, or weirs that have an executive director approved exemption under 30 TAC § 115.147(4).	<input type="checkbox"/> YES <input type="checkbox"/> NO

D. Loading and Unloading of VOCs

◆	1.	The application area includes VOC loading operations.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	2.	The application area includes VOC transport vessel unloading operations. <i>For GOP applications, if the responses to Questions III.D.1 - D.2 are "NO," go to Section III.E.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 6

III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)

D. Loading and Unloading of VOCs (continued)

◆ 3. Transfer operations at motor vehicle fuel dispensing facilities are the only VOC transfer operations conducted in the application area. ☐ YES ☒ NO

E. Filling of Gasoline Storage Vessels (Stage I) for Motor Vehicle Fuel Dispensing Facilities

◆ 1. The application area includes one or more motor vehicle fuel dispensing facilities and gasoline is transferred from a tank-truck tank into a stationary storage container. ☐ YES ☒ NO
If the response to Question III.E.1 is "NO," go to Section III.F.

◆ 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. ☐ YES ☐ NO
If the response to Question III.E.2 and/or E.3 is "YES," go to Section III.F.

◆ 4. The application area is located in a covered attainment county as defined in 30 TAC § 115.10. ☐ YES ☐ NO
If the response to Question III.E.4 is "NO," go to Question III.E.9.

◆ 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. ☐ YES ☐ NO
If the response to Question III.E.7 is "YES," go to Section III.F.

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 7

III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)

E. Filling of Gasoline Storage Vessels (Stage I) for Motor Vehicle Fuel Dispensing Facilities (continued)

◆	8. At facilities located in Bastrop, Bexar, Caldwell, Comal, Guadalupe, Hays, Travis, Williamson, or Wilson County, transfers are made to stationary storage tanks greater than 1000 gallons located at a facility which has dispensed no more than 25,000 gallons of gasoline in a calendar month after December 31, 2004. <i>If the response to Question III.E.8 is "YES," go to Section III.F.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	9. Transfers are made to stationary storage tanks located at a motor vehicle fuel dispensing facility which has dispensed no more than 10,000 gallons of gasoline in any calendar month after January 1, 1991 and for which construction began prior to November 15, 1992.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	10. Transfers are made to stationary storage tanks located at a motor vehicle fuel dispensing facility which has dispensed more than 10,000 gallons of gasoline in any calendar month after January 1, 1991 and for which construction began prior to November 15, 1992.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	11. Transfers are made to stationary storage tanks located at a motor vehicle fuel dispensing facility which commenced construction on or after November 15, 1992.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	12. At facilities located in Ellis, Johnson, Kaufman, Parker, or Rockwall County, transfers are made to stationary storage tanks located at a facility which has dispensed at least 10,000 gallons of gasoline but less than 125,000 gallons of gasoline in a calendar month after April 30, 2005.	<input type="checkbox"/> YES <input type="checkbox"/> NO

F. Control of VOC Leaks from Transport Vessels (Complete this section for GOP applications for GOPs 511, 512, 513 and 514 only)

◆	1. Tank-truck tanks are filled with, or emptied of, gasoline at a facility that is subject to 30 TAC § 115.214(a)(1)(C) or 115.224(2) within the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
---	--	---

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 8

III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)

F. Control of VOC Leaks from Transport Vessels (Complete this section for GOP applications for GOPs 511, 512, 513 and 514 only) (continued)

◆	2. Tank-truck tanks are filled with non-gasoline VOCs having a TVP greater than or equal to 0.5 psia under actual storage conditions at a facility subject to 30 TAC § 115.214(a)(1)(C) within the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
◆	3. Tank-truck tanks are filled with, or emptied of, gasoline at a facility that is subject to 30 TAC § 115.214(b)(1)(C) or 115.224(2) within the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A

G. Control of Vehicle Refueling Emissions (Stage II) at Motor Vehicle Fuel Dispensing Facilities

◆	1. The application area includes one or more motor vehicle fuel dispensing facilities and gasoline is transferred from a stationary storage container into motor vehicle fuel tanks. <i>If the response to Question III.G.1 is "NO" or "N/A," go to Section III.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
◆	2. The application area includes facilities that began construction on or after November 15, 1992 and prior to May 16, 2012.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	3. The application area includes facilities that began construction prior to November 15, 1992. <i>If the responses to Questions III.G.2 and Question III.G.3 are both "NO," go to Section III.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	4. The application area includes only facilities that have a monthly throughput of less than 10,000 gallons of gasoline.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	5. The decommissioning of all Stage II vapor recovery control equipment located in the application area has been completed and the decommissioning notice submitted.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 9

III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)

H. Control Of Reid Vapor Pressure (RVP) of Gasoline

◆	1. The application area includes stationary tanks, reservoirs, or other containers holding gasoline that may ultimately be used in a motor vehicle in El Paso County. <i>If the response to Question III.H.1 is "NO" or "N/A," go to Section III.I.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
◆	2. The application area includes stationary tanks, reservoirs, or other containers holding gasoline that will be used exclusively for the fueling of agricultural implements.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	3. The application area includes a motor vehicle fuel dispensing facility.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	4. The application area includes stationary tanks, reservoirs, or other containers holding gasoline and having a nominal capacity of 500 gallons or less.	<input type="checkbox"/> YES <input type="checkbox"/> NO

I. Process Unit Turnaround and Vacuum-Producing Systems in Petroleum Refineries

1.	The application area is located at a petroleum refinery.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
----	--	---

J. Surface Coating Processes (Complete this section for GOP applications only.)

◆	1. Surface coating operations (other than those performed on equipment located on-site and in-place) that meet the exemption specified in 30 TAC § 115.427(3)(A) or 115.427(7) are performed in the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
---	---	---

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 11

III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)

L. Degassing of Storage Tanks, Transport Vessels and Marine Vessels (continued)

◆	3.	Degassing of stationary VOC storage vessels with a nominal storage capacity of 1,000,000 gallons or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
◆	4.	Degassing of stationary VOC storage vessels with a nominal storage capacity of 250,000 gallons or more, or a nominal storage capacity of 75,000 gallons and storing materials with a true vapor pressure greater than 2.6 psia, and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
◆	5.	Degassing of VOC transport vessels with a nominal storage capacity of 8,000 gallons or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	6.	Degassing of VOC marine vessels with a nominal storage capacity of 10,000 barrels (420,000 gallons) or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
◆	7.	Degassing of VOC marine vessels with a nominal storage capacity of 10,000 barrels (420,000 gallons) and a vapor space partial pressure \geq 0.5 psia that have sustained damage as specified in 30 TAC § 115.547(5) is performed in the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A

M. Petroleum Dry Cleaning Systems

	1.	The application area contains one or more petroleum dry cleaning facilities that use petroleum based solvents.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
--	----	--	---

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 12

III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)

N. Vent Gas Control (Highly-reactive volatile organic compounds (HRVOC))

1.	The application area includes one or more vent gas streams containing HRVOC.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
2.	The application area includes one or more flares that emit or have the potential to emit HRVOC. <i>If the responses to Questions III.N.1 and III.N.2 are both "NO" or "N/A," go to Section III.O. If the response to Question III.N.1 is "YES," continue with Question III.N.3.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
3.	All vent streams in the application area that are routed to a flare contain less than 5.0% HRVOC by weight at all times.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4.	All vent streams in the application area that are not routed to a flare contain less than 100 ppmv HRVOC at all times. <i>If the responses to Questions III.N.3 and III.N.4 are both "NO," go to Section III.O.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
5.	The application area contains pressure relief valves that are not controlled by a flare.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6.	The application area has at least one vent stream which has no potential to emit HRVOC.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7.	The application area has vent streams from a source described in 30 TAC § 115.727(c)(3)(A) - (H).	<input type="checkbox"/> YES <input type="checkbox"/> NO

O. Cooling Tower Heat Exchange Systems (HRVOC)

1.	The application area includes one or more cooling tower heat exchange systems that emit or have the potential to emit HRVOC.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
----	--	---

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 13

IV. Title 30 TAC Chapter 117 - Control of Air Pollution from Nitrogen Compounds

A. Applicability

◆	1. The application area is located in the Houston/Galveston/Brazoria, Beaumont/Port Arthur, or Dallas/Fort Worth Eight-Hour area. <i>For SOP applications, if the response to Question IV.A.1 is "YES," complete Sections IV.B - IV.F and IV.H. 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.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	2. The application area is located in Bexar, Comal, Ellis, Hays, or McLennan County and includes a cement kiln. <i>If the response to Question IV.A.2 is "YES," go to Question IV.H.1.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	3. The application area includes a utility electric generator in an east or central Texas county. <i>See instructions for a list of counties included. 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.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

B. Utility Electric Generation in Ozone Nonattainment Areas

	1. The application area includes units specified in 30 TAC §§ 117.1000, 117.1200, or 117.1300. <i>If the response to Question IV.B.1 is "NO," go to Question IV.C.1.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
	2. The application area is complying with a System Cap in 30 TAC §§ 117.1020 or 117.1220.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 14

IV. Title 30 TAC Chapter 117 - Control of Air Pollution from Nitrogen Compounds (continued)

C. Commercial, Institutional, and Industrial Sources in Ozone Nonattainment Areas

◆	1. The application area is located at a site subject to 30 TAC Chapter 117, Subchapter B and includes units specified in 30 TAC §§ 117.100, 117.300, or 117.400. <i>For SOP applications, if the response to Question IV.C.1 is "NO," go to Question IV.D.1. For GOP applications for GOP 517, if the response to Question IV.C.1 is "NO," go to Section IV.F.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	2. The application area is located at a site that was a major source of NO _x before November 15, 1992.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
◆	3. The application area includes an electric generating facility required to comply with the System Cap in 30 TAC § 117.320.	<input type="checkbox"/> YES <input type="checkbox"/> NO

D. Adipic Acid Manufacturing

1.	The application area is located at, or part of, an adipic acid production unit.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
----	---	--

E. Nitric Acid Manufacturing - Ozone Nonattainment Areas

1.	The application area is located at, or part of, a nitric acid production unit.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
----	--	--

F. Combustion Control at Minor Sources in Ozone Nonattainment Areas - Boilers, Process Heaters, Stationary Engines and Gas Turbines

◆	1. The application area is located at a site that is a minor source of NO _x in the Houston/Galveston/Brazoria or Dallas/Fort Worth Eight-Hour areas (except for Wise County). <i>For SOP applications, if the response to Question IV.F.1 is "NO," go to Question IV.G.1. For GOP applications, if the response to Question IV.F.1 is "NO," go to Section VI.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	2. The application area is located in the Houston/Galveston/Brazoria area and has units that qualify for an exemption under 30 TAC § 117.2003(a).	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	3. The application area is located in the Houston/Galveston/Brazoria area and has units that qualify for an exemption under 30 TAC § 117.2003(b).	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 15

IV. Title 30 TAC Chapter 117 - Control of Air Pollution from Nitrogen Compounds (continued)

F. Combustion Control at Minor Sources in Ozone Nonattainment Areas - Boilers, Process Heaters, Stationary Engines and Gas Turbines (continued)

◆	4.	The application area is located in the Dallas/Fort Worth Eight-Hour area (except for Wise County) and has units that qualify for an exemption under 30 TAC § 117.2103.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	5.	The application area has units subject to the emission specifications under 30 TAC §§ 117.2010 or 30 TAC § 117.2110.	<input type="checkbox"/> YES <input type="checkbox"/> NO
	6.	The application area has a unit that has been approved for alternative case specific specifications (ACSS) in 30 TAC § 117.2025 or 30 TAC § 117.2125. <i>If the response to Question IV.F.6 is "NO," go to Section IV.G.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
	7.	An ACSS for carbon monoxide (CO) has been approved?	<input type="checkbox"/> YES <input type="checkbox"/> NO
	8.	An ACSS for ammonia (NH ₃) has been approved?	<input type="checkbox"/> YES <input type="checkbox"/> NO
	9.	Provide the Permit Number(s) and authorization/issuance date(s) of the NSR project(s) that incorporates an ACSS below.	

G. Utility Electric Generation in East and Central Texas

	1.	The application area includes utility electric power boilers and/or stationary gas turbines (including duct burners used in turbine exhaust ducts) that were placed into service before December 31, 1995. <i>If the response to Question IV.G.1 is "NO," go to Question IV.H.1.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	2.	The application area is complying with the System Cap in 30 TAC § 117.3020.	<input type="checkbox"/> YES <input type="checkbox"/> NO

H. Multi-Region Combustion Control - Water Heaters, Small Boilers, and Process Heaters

	1.	The application area includes a manufacturer, distributor, retailer or installer of natural gas fired water heaters, boilers or process heaters with a maximum rated capacity of 2.0 MMBtu/hr or less. <i>If the response to question IV.H.1 is "NO," go to Section V.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	2.	All water heaters, boilers or process heaters manufactured, distributed, retailed or installed qualify for an exemption under 30 TAC § 117.3203.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 16

V. Title 40 Code of Federal Regulations Part 59 (40 CFR Part 59) - National Volatile Organic Compound Emission Standards for Consumer and Commercial Products

A. Subpart B - National Volatile Organic Compound Emission Standards for Automobile Refinish Coatings

- | | |
|---|---|
| 1. The application area manufactures automobile refinishing coatings or coating components and sells or distributes these coatings or coating components in the United States. | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| 2. The application area imports automobile refinishing coatings or coating components, manufactured on or after January 11, 1999, and sells or distributes these coatings or coating components in the United States.
<i>If the responses to Questions V.A.1 and V.A.2 are both "NO," go to Section V.B.</i> | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| 3. All automobile refinishing coatings or coating components manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR § 59.100(c)(1) - (6). | <input type="checkbox"/> YES <input type="checkbox"/> NO |

B. Subpart C - National Volatile Organic Compound Emission Standards for Consumer Products

- | | |
|--|---|
| 1. The application area manufactures consumer products for sale or distribution in the United States. | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| 2. The application area imports consumer products manufactured on or after December 10, 1998 and sells or distributes these consumer products in the United States. | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| 3. The application area is a distributor of consumer products whose name appears on the label of one or more of the products.
<i>If the responses to Questions V.B.1 - V.B.3 are all "NO," go to Section V.C.</i> | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| 4. All consumer products manufactured, imported, or distributed by the application area meet one or more of the exemptions specified in 40 CFR § 59.201(c)(1) - (7). | <input type="checkbox"/> YES <input type="checkbox"/> NO |

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 18

VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)

B. Subpart Y - Standards of Performance for Coal Preparation and Processing Plants

1.	The application area is located at a coal preparation and processing plant. <i>If the response to Question VI.B.1 is "NO," go to Section VI.C.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
2.	The coal preparation and processing plant has a design capacity greater than 200 tons per day (tpd). <i>If the response to Question VI.B.2 is "NO," go to Section VI.C.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3.	The plant has an option to enforceably limit its operating level to less than 200 tpd and is choosing this option. <i>If the response to Question VI.B.3 is "YES," go to Section VI.C.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4.	The plant contains an open storage pile, as defined in § 60.251, as an affected facility. <i>If the response to Question VI.B.4 is "NO," go to Section VI.C.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
5.	The open storage pile was constructed, reconstructed or modified after May 27, 2009.	<input type="checkbox"/> YES <input type="checkbox"/> NO

C. Subpart GG - Standards of Performance for Stationary Gas Turbines (GOP applicants only)

◆	1. The application area includes one or more stationary gas turbines that have a heat input at peak load greater than or equal to 10 MMBtu/hr (10.7GJ/hr), based on the lower heating value of the fuel fired. <i>If the response to Question VI.C.1 is "NO" or "N/A," go to Section VI.D.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
◆	2. One or more of the affected facilities were constructed, modified, or reconstructed after October 3, 1977 and prior to February 19, 2005. <i>If the response to Question VI.C.2 is "NO," go to Section VI.D.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	3. One or more stationary gas turbines in the application area are using a previously approved alternative fuel monitoring schedule as specified in 40 CFR § 60.334(h)(4).	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	4. The exemption specified in 40 CFR § 60.332(e) is being utilized for one or more stationary gas turbines in the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 19	
VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)	
C. Subpart GG - Standards of Performance for Stationary Gas Turbines (GOP applicants only) (continued)	
◆	<div style="display: flex; justify-content: space-between;"> <div style="width: 80%;"> <p>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.</p> </div> <div style="width: 15%;"> <input type="checkbox"/> YES <input type="checkbox"/> NO </div> </div>
D. Subpart XX - Standards of Performance for Bulk Gasoline Terminals	
	<div style="display: flex; justify-content: space-between;"> <div style="width: 80%;"> <p>1. The application area includes bulk gasoline terminal loading racks. <i>If the response to Question VI.D.1 is "NO," go to Section VI.E.</i></p> </div> <div style="width: 15%;"> <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A </div> </div>
	<div style="display: flex; justify-content: space-between;"> <div style="width: 80%;"> <p>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.</p> </div> <div style="width: 15%;"> <input type="checkbox"/> YES <input type="checkbox"/> NO </div> </div>
E. Subpart LLL - Standards of Performance for Onshore Natural Gas Processing: Sulfur Dioxide (SO₂) Emissions	
◆	<div style="display: flex; justify-content: space-between;"> <div style="width: 80%;"> <p>1. The application area includes affected facilities identified in 40 CFR § 60.640(a) that process natural gas (onshore). <i>For SOP applications, if the response to Question VI.E.1 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.1 is "NO" or "N/A," go to Section VI.H.</i></p> </div> <div style="width: 15%;"> <input type="checkbox"/> YES <input type="checkbox"/> NO </div> </div>
◆	<div style="display: flex; justify-content: space-between;"> <div style="width: 80%;"> <p>2. The affected facilities commenced construction or modification after January 20, 1984 and on or before August 23, 2011. <i>For SOP applications, if the response to Question VI.E.2 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.2 is "NO," go to Section VI.H.</i></p> </div> <div style="width: 15%;"> <input type="checkbox"/> YES <input type="checkbox"/> NO </div> </div>
◆	<div style="display: flex; justify-content: space-between;"> <div style="width: 80%;"> <p>3. The application area includes a gas sweetening unit with a design capacity greater than or equal to 2 long tons per day (LTPD) of hydrogen sulfide but operates at less than 2 LTPD. <i>For SOP applications, if the response to Question VI.E.3 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.3 is "NO," go to Section VI.H.</i></p> </div> <div style="width: 15%;"> <input type="checkbox"/> YES <input type="checkbox"/> NO </div> </div>

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 20	
VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)	
E. Subpart LLL - Standards of Performance for Onshore Natural Gas Processing: Sulfur Dioxide (SO₂) Emissions (continued)	
◆ 4. Federally enforceable operating limits have been established in the preconstruction authorization limiting the gas sweetening unit to less than 2 LTPD. <i>For SOP applications, if the response to Question VI.E.4. is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.4. is "NO," go to Section VI.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 5. Please provide the Unit ID(s) for the gas sweetening unit(s) that have established federally enforceable operating limits in the space provided below.	
F. Subpart OOO - Standards of Performance for Nonmetallic Mineral Processing Plants	
1. The application area includes affected facilities identified in 40 CFR § 60.670(a)(1) that are located at a fixed or portable nonmetallic mineral processing plant. <i>If the response to Question VI.F.1 is "NO," go to Section VI.G.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
2. Affected facilities identified in 40 CFR § 60.670(a)(1) and located in the application area are subject to 40 CFR Part 60, Subpart OOO.	<input type="checkbox"/> YES <input type="checkbox"/> NO
G. Subpart QQQ - Standards of Performance for VOC Emissions from Petroleum Refinery Wastewater Systems	
1. The application area is located at a petroleum refinery and includes one or more of the affected facilities identified in 40 CFR § 60.690(a)(2) - (4) for which construction, modification, or reconstruction was commenced after May 4, 1987. <i>If the response to Question VI.G.1 is "NO," go to Section VI.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area includes storm water sewer systems.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 21

VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)

G. Subpart QQQ - Standards of Performance for VOC Emissions from Petroleum Refinery Wastewater Systems (continued)

- | | | |
|----|---|--|
| 3. | The application area includes ancillary equipment which is physically separate from the wastewater system and does not come in contact with or store oily wastewater. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 4. | The application area includes non-contact cooling water systems. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 5. | The application area includes individual drain systems.
<i>If the response to Question VI.G.5 is "NO," go to Section VI.H.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 6. | The application area includes one or more individual drain systems that meet the exemption specified in 40 CFR § 60.692-2(d). | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 7. | The application area includes completely closed drain systems. | <input type="checkbox"/> YES <input type="checkbox"/> NO |

H. Subpart AAAA - Standards of Performance for Small Municipal Waste Incineration Units for Which Construction Commenced After August 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 6, 2004

- | | | | |
|---|----|---|--|
| ◆ | 1. | The application area includes at least one small municipal waste incineration unit, other than an air curtain incinerator.
<i>If the response to Question VI.H.1. is "N/A," go to Section VI.I. If the response to Question VI.H.1 is "NO," go to Question VI.H.4.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO
<input type="checkbox"/> N/A |
| ◆ | 2. | The application area includes at least one small municipal waste incineration unit, other than an air curtain incinerator, constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| ◆ | 3. | The application area includes at least one small municipal waste incineration unit, other than an air curtain incinerator, constructed before August 30, 1999 and not modified or reconstructed on or after June 6, 2006. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| ◆ | 4. | The application area includes at least one air curtain incinerator.
<i>If the response to Question VI.H.4 is "NO," go to Section VI.I.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 22

VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)

H. Subpart AAAA - Standards of Performance for Small Municipal Waste Incineration Units for Which Construction Commenced After August 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 6, 2004 (continued)

◆	5. The application area includes at least one air curtain incinerator constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006. <i>If the response to Question VI.H.5 is "NO," go to Question VI.H.7.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	6. All air curtain incinerators constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006 combust only yard waste.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	7. The application area includes at least one air curtain incinerator constructed before August 30, 1999 and not modified or reconstructed on or after June 6, 2006.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	8. All air curtain incinerators constructed before August 30, 1999 and not modified or reconstructed on or after June 6, 2006 combust only yard waste.	<input type="checkbox"/> YES <input type="checkbox"/> NO

I. Subpart CCCC - Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction Commenced After November 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 1, 2001

◆	1. The application area includes at least one commercial or industrial solid waste incineration unit, other than an air curtain incinerator. <i>If the response to Question VI.I.1 is "N/A," go to Section VI.J. If the response to Question VI.I.1 is "NO," go to Question VI.I.4.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
◆	2. The application area includes at least one commercial or industrial solid waste incineration unit, other than an air curtain incinerator, constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 23

VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)

I. Subpart CCCC - Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction Commenced After November 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 1, 2001 (continued)

◆	3.	The application area includes at least one commercial or industrial solid waste incineration unit, other than an air curtain incinerator, constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	4.	The application area includes at least one air curtain incinerator. <i>If the response to Question VI.I.4 is "NO," go to Section VI.J.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	5.	The application area includes at least one air curtain incinerator, constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001. <i>If the response to Question VI.I.5 is "NO," go to VI.I.7.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	6.	All air curtain incinerators constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	7.	The application area includes at least one air curtain incinerator, constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	8.	All air curtain incinerators constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 24

VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)

J. Subpart EEEE - Standards of Performance for Other Solid Waste Incineration Units for Which Construction Commenced After December 9, 2004 or for Which Modification or Reconstruction Commenced on or After June 16, 2006

◆	1. The application area includes at least one very small municipal waste incineration unit or institutional incineration unit, other than an air curtain incinerator. <i>If the response to Question VI.J.1 is "N/A," go to Section VI.K. If the response to Question VI.J.1 is "NO," go to Question VI.J.4.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
◆	2. The application area includes at least one very small municipal waste incineration unit, other than an air curtain incinerator, constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	3. The application area includes at least one very small municipal waste incineration unit, other than an air curtain incinerator, constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	4. The application area includes at least one air curtain incinerator. <i>If the response to Question VI.J.4 is "NO," go to Section VI.K.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	5. The application area includes at least one air curtain incinerator constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006. <i>If the response to Question VI.J.5 is "NO," go to Question VI.J.7.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	6. All air curtain incinerators constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	7. The application area includes at least one air curtain incinerator constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 25

VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (NSPS) (continued)

J. Subpart EEEE - Standards of Performance for Other Solid Waste Incineration Units for Which Construction Commenced After December 9, 2004 or for Which Modification or Reconstruction Commenced on or After June 16, 2006 (continued)

- | | | |
|---|---|--|
| ◆ | 8. All air curtain incinerators constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006 combust only wood waste, clean lumber, or yard waste or a mixture of these materials. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| ◆ | 9. The air curtain incinerator is located at an institutional facility and is a distinct operating unit of the institutional facility that generated the waste. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| ◆ | 10. The air curtain incinerator burns less than 35 tons per day of wood waste, clean lumber, or yard waste or a mixture of these materials. | <input type="checkbox"/> YES <input type="checkbox"/> NO |

K. Subpart OOOO - Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution

- | | | |
|---|---|--|
| ◆ | 1. The application area includes one or more of the onshore affected facilities listed in 40 CFR § 60.5365(a)-(g) that are subject to 40 CFR Part 60, Subpart OOOO. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
|---|---|--|

VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants

A. Applicability

- | | | |
|---|--|--|
| ◆ | 1. The application area includes a unit(s) that is subject to one or more 40 CFR Part 61 subparts.
<i>If the response to Question VII.A.1 is "NO" or "N/A," go to Section VIII.</i> | YES <input checked="" type="checkbox"/> NO
<input type="checkbox"/> N/A |
|---|--|--|

B. Subpart F - National Emission Standard for Vinyl Chloride

- | | | |
|----|--|---------------------------------|
| 1. | The application area is located at a plant which produces ethylene dichloride by reaction of oxygen and hydrogen chloride with ethylene, vinyl chloride by any process, and/or one or more polymers containing any fraction of polymerized vinyl chloride. | YES <input type="checkbox"/> NO |
|----|--|---------------------------------|

C. Subpart J - National Emission Standard for Benzene Emissions for Equipment Leaks (Emission Sources) of Benzene (Complete this section for GOP applications only)

- | | | |
|---|--|--|
| ◆ | 1. The application area includes equipment in benzene service. | <input type="checkbox"/> YES <input type="checkbox"/> NO
<input type="checkbox"/> N/A |
|---|--|--|

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 26

VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)

D. Subpart L - National Emission Standard for Benzene Emissions from Coke By-Product Recovery Plants

- | | |
|---|--|
| 1. The application area is located at a coke by-product recovery plant and includes one or more of the affected sources identified in 40 CFR § 61.130(a) - (b).
<i>If the response to Question VII.D.1 is "NO," go to Section VII.E.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 2. The application area includes equipment in benzene service as determined by 40 CFR § 61.137(b). | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 3. The application area has elected to comply with the provisions of 40 CFR § 61.243-1 and 40 CFR § 61.243-2. | <input type="checkbox"/> YES <input type="checkbox"/> NO |

E. Subpart M - National Emission Standard for Asbestos

Applicability

- | | |
|---|--|
| 1. The application area includes sources, operations, or activities specified in 40 CFR §§ 61.143, 61.144, 61.146, 61.147, 61.148, or 61.155.
<i>If the response to Question VII.E.1 is "NO," go to Section VII.F.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |
|---|--|

Roadway Construction

- | | |
|---|--|
| 2. The application area includes roadways constructed or maintained with asbestos tailings or asbestos-containing waste material. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
|---|--|

Manufacturing Commercial Asbestos

- | | |
|--|--|
| 3. The application area includes a manufacturing operation using commercial asbestos.
<i>If the response to Question VII.E.3 is "NO," go to Question VII.E.4.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| a. Visible emissions are discharged to outside air from the manufacturing operation | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| b. An alternative emission control and waste treatment method is being used that has received prior U.S. Environmental Protection Agency (EPA) approval. | <input type="checkbox"/> YES <input type="checkbox"/> NO |

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 27

VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)

E. Subpart M - National Emission Standard for Asbestos (continued)

Manufacturing Commercial Asbestos (continued)

c. Asbestos-containing waste material is processed into non-friable forms.	YES <input type="checkbox"/> NO <input type="checkbox"/>
d. Asbestos-containing waste material is adequately wetted.	YES <input type="checkbox"/> NO <input type="checkbox"/>
e. Alternative filtering equipment is being used that has received EPA approval.	YES <input type="checkbox"/> NO <input type="checkbox"/>
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 <input type="checkbox"/> NO <input type="checkbox"/>
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 <input type="checkbox"/> NO <input type="checkbox"/>

Asbestos Spray Application

4. The application area includes operations in which asbestos-containing materials are spray applied. <i>If the response to Question VII.E.4 is "NO," go to Question VII.E.5.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
a. Asbestos fibers are encapsulated with a bituminous or resinous binder during spraying and are not friable after drying. <i>If the response to Question VII.E.4.a is "YES," go to Question VII.E.5.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
b. Spray-on applications on buildings, structures, pipes, and conduits do not use material containing more than 1% asbestos.	<input type="checkbox"/> YES <input type="checkbox"/> NO
c. An alternative emission control and waste treatment method is being used that has received prior EPA approval.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

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 <input type="checkbox"/> NO <input type="checkbox"/>
e. Asbestos-containing waste material is adequately wetted.	YES <input type="checkbox"/> NO <input type="checkbox"/>
f. Alternative filtering equipment is being used that has received EPA approval.	YES <input type="checkbox"/> NO <input type="checkbox"/>
g. A HEPA filter is being used that is certified to be at least 99.97% efficient for 0.3 micron particles.	YES <input type="checkbox"/> NO <input type="checkbox"/>
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 <input type="checkbox"/> NO <input type="checkbox"/>

Fabricating Commercial Asbestos

5. The application area includes a fabricating operation using commercial asbestos. <i>If the response to Question VII.E.5 is "NO," go to Question VII.E.6.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
a. Visible emissions are discharged to outside air from the manufacturing operation.	<input type="checkbox"/> YES <input type="checkbox"/> NO
b. An alternative emission control and waste treatment method is being used that has received prior EPA approval.	<input type="checkbox"/> YES <input type="checkbox"/> NO
c. Asbestos-containing waste material is processed into non-friable forms.	<input type="checkbox"/> YES <input type="checkbox"/> NO
d. Asbestos-containing waste material is adequately wetted.	<input type="checkbox"/> YES <input type="checkbox"/> NO
e. Alternative filtering equipment is being used that has received EPA approval.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 31

VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)

H. Subpart FF - National Emission Standard for Benzene Waste Operations (continued)

Applicability (continued)

- | | | |
|----|--|--|
| 6. | The flow-weighted annual average benzene concentration of each waste stream at the site is based on documentation. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 7. | The application area has waste streams with flow-weighted annual average water content of 10% or greater. | <input type="checkbox"/> YES <input type="checkbox"/> NO |

Waste Stream Exemptions

- | | | |
|-----|--|--|
| 8. | The application area has waste streams that meet the exemption specified in 40 CFR § 61.342(c)(2) (the flow-weighted annual average benzene concentration is less than 10 ppmw). | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 9. | The application area has waste streams that meet the exemption specified in 40 CFR § 61.342(c)(3) because process wastewater has a flow rate less than 0.02 liters per minute or an annual wastewater quantity less than 10 Mg/yr. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 10. | The application area has waste streams that meet the exemption specified in 40 CFR § 61.342(c)(3) because the total annual benzene quantity is less than or equal to 2 Mg/yr. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 11. | The application area transfers waste off-site for treatment by another facility. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 12. | The application area is complying with 40 CFR § 61.342(d). | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 13. | The application area is complying with 40 CFR § 61.342(e).
<i>If the response to Question VII.H.13 is "NO," go to Question VII.H.15.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 14. | The application area has facility waste with a flow weighted annual average water content of less than 10%. | <input type="checkbox"/> YES <input type="checkbox"/> NO |

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 32

VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)

H. Subpart FF - National Emission Standard for Benzene Waste Operations (continued)

Container Requirements

- | | |
|---|--|
| 15. The application area has containers, as defined in 40 CFR § 61.341, that receive non-exempt benzene waste.
<i>If the response to Question VII.H.15 is "NO," go to Question VII.H.18.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 16. The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers.
<i>If the response to Question VII.H.16 is "YES," go to Question VII.H.18.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 17. Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure. | <input type="checkbox"/> YES <input type="checkbox"/> NO |

Individual Drain Systems

- | | |
|---|--|
| 18. The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage non-exempt benzene waste.
<i>If the response to Question VII.H.18 is "NO," go to Question VII.H.25.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 19. The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems.
<i>If the response to Question VII.H.19 is "YES," go to Question VII.H.25.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 20. The application area has individual drain systems complying with 40 CFR § 61.346(a).
<i>If the response to Question VII.H.20 is "NO," go to Question VII.H.22.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 21. Covers and closed-vent systems used for individual drain systems operate such that the individual drain system is maintained at a pressure less than atmospheric pressure. | <input type="checkbox"/> YES <input type="checkbox"/> NO |

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 33	
VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)	
H. Subpart FF - National Emission Standard for Benzene Waste Operations (continued)	
<i>Individual Drain Systems (continued)</i>	
22. The application area has individual drain systems complying with 40 CFR § 61.346(b). <i>If the response to Question VII.H.22 is "NO," go to Question VII.H.25.</i>	YES <input type="checkbox"/> NO <input type="checkbox"/>
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 <input type="checkbox"/> NO <input type="checkbox"/>
24. Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device.	YES <input type="checkbox"/> NO <input type="checkbox"/>
<i>Remediation Activities</i>	
25. Remediation activities take place at the application area subject to 40 CFR Part 61, Subpart FF.	YES <input type="checkbox"/> NO <input type="checkbox"/>
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories	
A. Applicability	
◆ 1. The application area includes a unit(s) that is subject to one or more 40 CFR Part 63 subparts other than subparts made applicable by reference under subparts in 40 CFR Part 60, 61 or 63. <i>See instructions for 40 CFR Part 63 subparts made applicable only by reference.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
B. Subpart F - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry	
1. The application area is located at a plant site that is a major source as defined in the Federal Clean Air Act § 112(a). <i>If the response to Question VIII.B.1 is "NO," go to Section VIII.D.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 34

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

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

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

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 35

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

C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater

Applicability

- | | | |
|----|--|--|
| 1. | The application area is located at a site that is subject to 40 CFR 63, Subpart F and the application area includes process vents, storage vessels, transfer racks, or waste streams associated with a chemical manufacturing process subject to 40 CFR 63, Subpart F.
<i>If the response to Question VIII.C.1 is "NO," go to Section VIII.D.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 2. | The application area includes fixed roofs, covers, and/or enclosures that are required to comply with 40 CFR § 63.148. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 3. | The application area includes vapor collection systems or closed-vent systems that are required to comply with 40 CFR § 63.148.
<i>If the response to Question VIII.C.3 is "NO," go to Question VIII.C.8.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 4. | The application area includes vapor collection systems or closed-vent systems that are constructed of hard-piping. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 5. | The application area includes vapor collection systems or closed-vent systems that contain bypass lines that could divert a vent stream away from a control device and to the atmosphere.
<i>If the response to Question VIII.C.5 is "NO," go to Question VIII.C.8.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |

Vapor Collection and Closed Vent Systems

- | | | |
|----|---|--|
| 6. | Flow indicators are installed, calibrated, maintained, and operated at the entrances to bypass lines in the application area. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 7. | Bypass lines in the application area are secured in the closed position with a car-seal or a lock-and-key type configuration. | <input type="checkbox"/> YES <input type="checkbox"/> NO |

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

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)

Reloading or Cleaning of Railcars, Tank Trucks, or Barges

8. The application area includes reloading and/or cleaning of railcars, tank trucks, or barges that deliver HAPs to a storage tank.
If the response to Question VIII.C.8 is "NO," go to Question VIII.C.11. ☐ YES ☐ NO

9. The application area includes operations that are complying with § 63.119(g)(6) through the use of a closed-vent system with a control device used to reduce inlet emissions of HAPs by at least 95 percent by weight or greater. ☐ YES ☐ NO

10. The application area includes operations that are complying with § 63.119(g)(6) through the use of a vapor balancing system. ☐ YES ☐ NO

Transfer Racks

11. The application area includes Group 1 transfer racks that load organic HAPs. ☐ YES ☐ NO

Process Wastewater Streams

12. The application area includes process wastewater streams.
If the response to Question VIII.C.12 is "NO," go to Question VIII.C.34. ☐ YES ☐ NO

13. The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Part 61, Subpart FF.
If the response to Question VIII.C.13 is "NO," go to Question VIII.C.15. ☐ YES ☐ NO

14. The application area includes process wastewater streams that are complying with 40 CFR §§ 63.110(e)(1)(i) and (e)(1)(ii). ☐ YES ☐ NO

15. The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Part 61, Subpart F.
If the response to Question VIII.C.15 is "NO," go to Question VIII.C.17. ☐ YES ☐ NO

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

◆ *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)

16.	The application area includes process wastewater streams utilizing the compliance option specified in 40 CFR § 63.110(f)(4)(ii).	<input type="checkbox"/> YES <input type="checkbox"/> NO
17.	The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Parts 260 through 272. <i>If the response to Question VIII.C.17 is "NO," go to Question VIII.C.20.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
18.	The application area includes process wastewater streams complying with 40 CFR § 63.110(e)(2)(i).	<input type="checkbox"/> YES <input type="checkbox"/> NO
19.	The application are includes process wastewater streams complying with 40 CFR § 63.110(e)(2)(ii).	<input type="checkbox"/> YES <input type="checkbox"/> NO
20.	The application area includes process wastewater streams, located at existing sources, that are designated as Group 1; are required to be treated as Group 1 under 40 CFR § 63.110; or are determined to be Group 1 for Table 9 compounds.	<input type="checkbox"/> YES <input type="checkbox"/> NO
21.	The application area includes process wastewater streams, located at existing sources that are Group 2.	<input type="checkbox"/> YES <input type="checkbox"/> NO
22.	The application area includes process wastewater streams, located at new sources, that are designated as Group 1; required to be treated as Group 1 under 40 CFR § 63.110; or are determined to be Group 1 for Table 8 or Table 9 compounds.	<input type="checkbox"/> YES <input type="checkbox"/> NO
23.	The application area includes process wastewater streams, located at new sources that are Group 2 for both Table 8 and Table 9 compounds.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 38

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

C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)

Process Wastewater Streams (continued)

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

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 39

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

C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)

Drains

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

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 40

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

C. Subpart G-National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operation, and Wastewater (continued)

Drains (continued)

37. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds listed in 40 CFR Part 63 Subpart G, Table 9, at an annual average flow rate greater than or equal to 10 liters per minute. ☐ YES ☐ NO

38. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of a chemical manufacturing process unit that is subject to the new source requirements of 40 CFR § 63.100(l)(1) or (l)(2); and the equipment conveys water with a total annual average concentration greater than or equal to 10 parts per million by weight of compounds listed in 40 CFR Part 63 Subpart G, Table 8, at an average annual flow rate greater than or equal to 0.02 liter per minute. ☐ YES ☐ NO

Gas Streams

39. The application area includes gas streams meeting the characteristics of 40 CFR § 63.107(b) - (h) or the criteria of 40 CFR § 63.113(i) and are transferred to a control device not owned or operated by the applicant. ☐ YES ☐ NO

40. The applicant is unable to comply with 40 CFR §§ 63.113 - 63.118 for one or more reasons described in 40 CFR § 63.100(q)(1), (3), or (5). ☐ YES ☐ NO

D. Subpart N - National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks

1. The application area includes chromium electroplating or chromium anodizing tanks located at hard chromium electroplating, decorative chromium electroplating, and/or chromium anodizing operations. ☐ YES ☒ NO

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 41

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

E. Subpart O - Ethylene Oxide Emissions Standards for Sterilization Facilities

- | | |
|---|---|
| 1. The application area includes sterilization facilities where ethylene oxide is used in the sterilization or fumigation of materials.
<i>If the response to Question VIII.E.1 is "NO," go to Section VIII.F.</i> | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| 2. Sterilization facilities located in the application area are subject to 40 CFR Part 63, Subpart O.
<i>If the response to Question VIII.E.2 is "NO," go to Section VIII.F.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 3. The sterilization source has used less than 1 ton (907 kg) of ethylene oxide within all consecutive 12-month periods after December 6, 1996. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 4. The sterilization source has used less than 10 tons (9070 kg) of ethylene oxide within all consecutive 12-month periods after December 6, 1996. | <input type="checkbox"/> YES <input type="checkbox"/> NO |

F. Subpart Q - National Emission Standards for Industrial Process Cooling Towers

- | | |
|---|---|
| 1. The application area includes industrial process cooling towers.
<i>If the response to Question VIII.F.1 is "NO," go to Section VIII.G.</i> | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| 2. Chromium-based water treatment chemicals have been used on or after September 8, 1994. | <input type="checkbox"/> YES <input type="checkbox"/> NO |

G. Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)

- | | |
|--|---|
| 1. The application area includes a bulk gasoline terminal. | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| 2. The application area includes a pipeline breakout station.
<i>If the responses to Questions VIII.G.1 and VIII.G.2 are both "NO," go to Section VIII.H.</i> | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| 3. The bulk gasoline terminal or pipeline breakout station is located within a contiguous area and under common control with another bulk gasoline terminal or a pipeline breakout station.
<i>If the response to Question VIII.G.3 is "YES," go to Question VIII.G.10.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 42

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

G. Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) (continued)

4.	The bulk gasoline terminal or pipeline breakout station is located within a contiguous area and under common control with sources, other than bulk gasoline terminals or pipeline breakout stations that emit or have the potential to emit HAPs. <i>If the response to Question VIII.G.4 is "YES," go to Question VIII.G.10.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
5.	An emissions screening factor was calculated for the bulk gasoline terminal or pipeline breakout station. <i>If the response to Question VIII.G.5 is "NO," go to Question VIII.G.10.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
6.	The value 0.04(OE) is less than 5% of the value of the bulk gasoline terminal emissions screening factor (ET) or the pipeline breakout station emissions screening factor (Ep). <i>If the response to Question VIII.G.6 is "NO," go to Question VIII.G.10.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
7.	Emissions screening factor less than 0.5 (ET or EP < 0.5). <i>If the response to Question VIII.G.7 is "YES," go to Section VIII.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
8.	Emissions screening factor greater than or equal to 0.5, but less than 1.0 (0.5 ≤ ET or EP < 1.0). <i>If the response to Question VIII.G.8 is "YES," go to Section VIII.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
9.	Emissions screening factor greater than or equal to 1.0 (ET or EP ≥ 1.0). <i>If the response to Question VIII.G.9 is "YES," go to Question VIII.G.11.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
10.	The site at which the application area is located is a major source of HAP. <i>If the response to Question VIII.G.10 is "NO," go to Section VIII.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
11.	The application area is using an alternative leak monitoring program as described in 40 CFR § 63.424(f).	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 43

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

H. Subpart S - National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry

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

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 44

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

I. Subpart T - National Emission Standards for Halogenated Solvent Cleaning

1. The application area includes an individual batch vapor, in-line vapor, in-line cold, and/or batch cold solvent cleaning machine that uses a hazardous air pollutant (HAP) solvent, or any combination of halogenated HAP solvents, in a total concentration greater than 5% by weight, as a cleaning and/or drying agent.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area is located at a major source and includes solvent cleaning machines, qualifying as affected facilities, that use perchloroethylene, trichloroethylene or methylene chloride.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area is located at an area source and includes solvent cleaning machines, other than cold batch cleaning machines, that use perchloroethylene, trichloroethylene or methylene chloride.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins

1. The application area includes elastomer product process units and/or wastewater streams and wastewater operations that are associated with elastomer product process units. <i>If the response to Question VIII.J.1 is "NO," go to Section VIII.K.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. Elastomer product process units and/or wastewater streams and wastewater operations located in the application area are subject to 40 CFR Part 63, Subpart U. <i>If the response to Question VIII.J.2 is "NO," go to Section VIII.K.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 for organic HAPs as defined in 40 CFR § 63.482.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes process wastewater streams that are Group 2 for organic HAPs as defined in 40 CFR § 63.482.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 45

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

J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins (continued)

5.	All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.J.5 is "YES," go to Question VIII.J.15.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
6.	The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.J.6 is "NO," go to Question VIII.J.8.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
7.	The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	<input type="checkbox"/> YES <input type="checkbox"/> NO
8.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	<input type="checkbox"/> YES <input type="checkbox"/> NO
9.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.J.8 - VIII.J.9 are both "NO," go to Question VIII.J.11.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
10.	The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

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 Polymers and Resins (continued)

Containers

- | | |
|---|--|
| 11. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
|---|--|

Drains

- | | |
|---|--|
| 12. The application area includes individual drain systems that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
|---|--|

If the response to Question VIII.J.12 is "NO," go to Question VIII.J.15.

- | | |
|--|--|
| 13. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
|--|--|

- | | |
|---|--|
| 14. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
|---|--|

- | | |
|---|--|
| 15. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of an elastomer product process unit. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
|---|--|

If the response to Question VIII.J.15 is "NO," go to Section VIII.K.

- | | |
|---|--|
| 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). | <input type="checkbox"/> YES <input type="checkbox"/> NO |
|---|--|

If the response to Question VIII.J.16 is "NO," go to Section VIII.K.

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 47

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

J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins (continued)

Drains (continued)

- | | |
|--|--|
| 17. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.482, at any flow rate. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 18. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.482, at an annual average flow rate greater than or equal to 10 liters per minute. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 19. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of an elastomer product process unit that is a new affected source or part of a new affected source and the equipment conveys water with a total annual average concentration greater than or equal to 10 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.482, at an average annual flow rate greater than or equal to 0.02 liter per minute. | <input type="checkbox"/> YES <input type="checkbox"/> NO |

K. Subpart W - National Emission Standards for Hazardous Air Pollutants for Epoxy Resins Production and Non-nylon Polyamides Production

- | | |
|--|---|
| 1. The manufacture of basic liquid epoxy resins (BLR) and/or manufacture of wet strength resins (WSR) is conducted in the application area.
<i>If the response to Question VIII.K.1 is "NO" or "N/A," go to Section VIII.L.</i> | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<input type="checkbox"/> N/A |
| 2. The application area includes a BLR and/or WSR research and development facility. | <input type="checkbox"/> YES <input type="checkbox"/> NO |

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 50

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

N. Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries (continued)

Applicability (continued)

9. The application area includes Group 1 or Group 2 wastewater streams that are complying with 40 CFR § 63.640(o)(2)(ii). ☐ YES ☐ NO
If the response to Question VIII.N.9 is "NO," go to Section VIII.O.

10. The application area includes Group 2 wastewater streams or organic streams whose benzene emissions are subject to control through the use of one or more treatment processes or waste management units under the provisions of 40 CFR Part 61, Subpart FF on or after December 31, 1992. ☐ YES ☐ NO

Containers, Drains, and other Appurtenances

11. The application area includes containers that are subject to the requirements of 40 CFR § 63.135 as a result of complying with 40 CFR § 63.640(o)(2)(ii). ☐ YES ☐ NO

12. The application area includes individual drain systems that are subject to the requirements of 40 CFR § 63.136 as a result of complying with 40 CFR § 63.640(o)(2)(ii). ☐ YES ☐ NO

O. Subpart DD - National Emission Standards for Off-site Waste and Recovery Operations

1. The application area receives material that meets the criteria for off-site material as specified in 40 CFR § 63.680(b)(1). ☐ YES ☒ NO ☐ N/A
If the response to Question VIII.O.1 is "NO" or "N/A," go to Section VIII.P

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

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 51

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

O. Subpart DD - National Emission Standards for Off-site Waste and Recovery Operations (continued)

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

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 52

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

O. Subpart DD - National Emission Standards for Off-site Waste and Recovery Operations (continued)

11. The application area receives offsite materials with average VOHAP concentration less than 500 ppmw at the point of delivery that are not combined with materials having a VOHAP concentration of 500 ppmw or greater. <i>If the response to Question VIII.O.11 is "NO," go to Question VIII.O.14.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
12. VOHAP concentration is determined by direct measurement.	<input type="checkbox"/> YES <input type="checkbox"/> NO
13. VOHAP concentration is based on knowledge of the off-site material.	<input type="checkbox"/> YES <input type="checkbox"/> NO
14. The application area includes an equipment component that is a pump, compressor, and agitator, pressure relief device, sampling connection system, open-ended valve or line, valve, connector or instrumentation system. <i>If the response to Question VIII.O.14 is "NO," go to Question VIII.O.17.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
15. An equipment component in the application area contains or contacts off-site material with a HAP concentration greater than or equal to 10% by weight.	<input type="checkbox"/> YES <input type="checkbox"/> NO
16. An equipment component in the application area is intended to operate 300 hours or more during a 12-month period.	<input type="checkbox"/> YES <input type="checkbox"/> NO
17. The application area includes containers that manage non-exempt off-site material.	<input type="checkbox"/> YES <input type="checkbox"/> NO
18. The application area includes individual drain systems that manage non-exempt off-site materials.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 54

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

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

◆	5. The application area contains only a facility, prior to the point of custody transfer, with facility-wide actual annual average natural gas throughput less than 18.4 thousand standard cubic meters (649,789.9 ft ³) per day and a facility-wide actual annual average hydrocarbon liquid throughput less than 39,700 liters (10,487.6 gallons) per day. <i>For SOP applications, if the response to Question VIII.Q.5 is "YES," go to Section VIII.R.</i> <i>For GOP applications, if the response to Question VIII.Q.5 is "YES," go to Section VIII.Z.</i> <i>For all applications, if the response to Question VIII.Q.5 is "NO," go to Question VIII.Q.9.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	6. The application area includes a triethylene glycol (TEG) dehydration unit. <i>For SOP applications, if the answer to Question VIII.Q.6 is "NO," go to Section VIII.R. For GOP applications, if the response to Question VIII.Q.6 is "NO," go to Section VIII.Z.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	7. The application area is located at a site that is within the boundaries of UA plus offset or a UC, as defined in 40 CFR § 63.761.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	8. The site has actual emissions of 5 tons per year or more of a single HAP, or 12.5 tons per year or more of a combination of HAP.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	9. Emissions for major source determination are being estimated based on the maximum natural gas or hydrocarbon liquid throughput as calculated in § 63.760(a)(1)(i)-(iii).	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 56

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

U. Subpart PP - National Emission Standards for Containers (continued)

4. The application area includes containers using Container Level 3 controls. ☐ YES ☐ NO

V. Subpart RR - National Emission Standards for Individual Drain Systems

1. The application area includes individual drain systems for which another 40 CFR Part 60, 61, or 63 subpart references the use of 40 CFR Part 63, Subpart RR for the control of air emissions. ☐ YES ☒ NO

W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards

1. The application area includes an acetal resins production process unit; an acrylic and modacrylic fiber production process unit complying with 40 CFR § 63.1103(b)(3)(i); or an existing polycarbonate production process. ☐ YES ☒ NO

2. The application area includes process wastewater streams generated from an acetal resins production process unit; an acrylic and modacrylic fiber production process unit complying with 40 CFR § 63.1103(b)(3)(i); or an existing polycarbonate production process.
If the responses to Questions VIII.W.1 and VIII.W.2 are both "NO," go to Question VIII.W.20. ☐ YES ☒ NO

3. The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 under the requirements of 40 CFR § 63.132(c). ☐ YES ☐ NO

4. The application area includes process wastewater streams that are determined to be Group 2 under the requirements of 40 CFR § 63.132(c). ☐ YES ☐ NO

5. All Group 1 wastewater streams at the site are determined to have a total source mass flow rate of less than 1 MG/yr. ☐ YES ☐ NO

6. The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr.
If the response to Question VIII.W.6 is "NO," go to Question VIII.W.8. ☐ YES ☐ NO

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 58

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

W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)

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

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

Date:	
Permit No.:	
RN No.:	

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 59

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

W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)

<p>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.</p>	<p><input type="checkbox"/> YES <input type="checkbox"/> NO</p>
<p>20. The application area includes an ethylene production process unit.</p>	<p><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A</p>
<p>21. The application area includes waste streams generated from an ethylene production process unit. <i>If the responses to Questions VIII.W.20 and VIII.W.21 are both "NO" or "N/A," go to Question VIII.W.54.</i></p>	<p><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A</p>
<p>22. The waste stream(s) contains at least one of the chemicals listed in 40 CFR § 63.1103(e), Table 7(g)(1). <i>If the response to Question VIII.W.22 is "NO," go to Question VIII.W.54.</i></p>	<p><input type="checkbox"/> YES <input type="checkbox"/> NO</p>
<p>23. Waste stream(s) are transferred off-site for treatment. <i>If the response to Question VIII.W.23 is "NO," go to Question VIII.W.25.</i></p>	<p><input type="checkbox"/> YES <input type="checkbox"/> NO</p>
<p>24. The application area has waste management units that treat or manage waste stream(s) prior to transfer off-site for treatment. <i>If the response to Question VIII.W.24 is "NO," go to Question VIII.W.54.</i></p>	<p><input type="checkbox"/> YES <input type="checkbox"/> NO</p>

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 60

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

W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)

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

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 61

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

W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)

32. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs. <i>If the response to Question VIII.W.32 is required, go to Question VIII.W.43.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
33. The application area has containers, as defined in 40 CFR § 61.341, that receive a continuous butadiene waste stream. <i>If the response to Question VIII.W.33 is "NO," go to Question VIII.W.36.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
34. The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers. <i>If the response to Question VIII.W.34 is "YES," go to Question VIII.W.36.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
35. Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	<input type="checkbox"/> YES <input type="checkbox"/> NO
36. The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage a continuous butadiene waste stream. <i>If the response to Question VIII.W.36 is "NO," go to Question VIII.W.43.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
37. The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. <i>If the response to Question VIII.W.37 is "YES," go to Question VIII.W.43.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 62

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

W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)

38. The application area has individual drain systems complying with 40 CFR § 61.346(a). <i>If the response to Question VIII.W.38 is "NO," go to Question VIII.W.40.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
39. Covers and closed-vent systems used for individual drain systems operate such that the individual drain system is maintained at a pressure less than atmospheric pressure.	<input type="checkbox"/> YES <input type="checkbox"/> NO
40. The application area has individual drain systems complying with 40 CFR § 61.346(b). <i>If the response to Question VIII.W.40 is "NO," go to Question VIII.W.43.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
41. Junction boxes in the individual drain systems are equipped with a system to prevent the flow of organic vapors from the junction box vent pipe to the atmosphere during normal operation.	<input type="checkbox"/> YES <input type="checkbox"/> NO
42. Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device.	<input type="checkbox"/> YES <input type="checkbox"/> NO
43. The application area has at least one waste stream that contains benzene. <i>If the response to Question VIII.W.43 is "NO," go to Question VIII.W.54.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
44. The application area has containers, as defined in 40 CFR § 61.341, that receive a waste stream containing benzene. <i>If the response to Question VIII.W.44 is "NO," go to Question VIII.W.47.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
45. The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers. <i>If the response to Question VIII.W.45 is "YES," go to Question VIII.W.47.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 63

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

W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)

46. Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	<input type="checkbox"/> YES <input type="checkbox"/> NO
47. The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage a waste stream containing benzene. <i>If the response to Question VIII.W.47 is "NO," go to Question VIII.W.54.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
48. The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. <i>If the response to Question VIII.W.48 is "YES," go to Question VIII.W.54.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
49. The application area has individual drain systems complying with 40 CFR § 61.346(a). <i>If the response to Question VIII.W.49 is "NO," go to Question VIII.W.51.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
50. Covers and closed-vent systems used for individual drain systems operate such that the individual drain system is maintained at a pressure less than atmospheric pressure.	<input type="checkbox"/> YES <input type="checkbox"/> NO
51. The application area has individual drain systems complying with 40 CFR § 61.346(b). <i>If the response to Question VIII.W.51 is "NO," go to Question VIII.W.54.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
52. Junction boxes in the individual drain systems are equipped with a system to prevent the flow of organic vapors from the junction box vent pipe to the atmosphere during normal operation.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 64

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

W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)

- | | |
|---|---|
| 53. Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 54. The application area contains a cyanide chemicals manufacturing process.
<i>If the response to Question VIII.W.54 is "NO," go to Section VIII.X.</i> | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| 55. The cyanide chemicals manufacturing process generates maintenance wastewater containing hydrogen cyanide or acetonitrile. | <input type="checkbox"/> YES <input type="checkbox"/> NO |

X. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins

- | | |
|--|---|
| 1. The application area includes thermoplastic product process units, and/or their associated affected sources specified in 40 CFR § 63.1310(a)(1) - (5), that are subject to 40 CFR Part 63, Subpart JJJ.
<i>If the response to Question VIII.X.1 is "NO," go to Section VIII.Y.</i> | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| 2. The application area includes thermoplastic product process units and/or wastewater streams and wastewater operations that are associated with thermoplastic product process units.
<i>If the response to Question VIII.X.2 is "NO," go to Section VIII.Y.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 3. All process wastewater streams generated or managed in the application area are from sources producing polystyrene.
<i>If the response to Question VIII.X.3 is "YES," go to Section VIII.Y.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 4. All process wastewater streams generated or managed in the application area are from sources producing ASA/AMSAN.
<i>If the response to Question VIII.X.4 is "YES," go to Section VIII.Y.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 65

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

X. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins (continued)

5.	The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 for organic HAPs as defined in 40 CFR § 63.1312.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6.	The application area includes process wastewater streams, located at existing sources, that are Group 2 for organic HAPs as defined in 40 CFR § 63.1312.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7.	The application area includes process wastewater streams, located at new sources, that are Group 2 for organic HAPs as defined in 40 CFR § 63.1312.	<input type="checkbox"/> YES <input type="checkbox"/> NO
8.	All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.X.8 is "YES," go to Question VIII.X.18.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
9.	The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.X.9 is "NO," go to Question VIII.X.11.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
10.	The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	<input type="checkbox"/> YES <input type="checkbox"/> NO
11.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	<input type="checkbox"/> YES <input type="checkbox"/> NO
12.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.X.11 - VIII.X.12 are both "NO," go to Question VIII.X.14.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 66

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

X. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins (continued)

- | | |
|---|--|
| 13. The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
|---|--|

Containers

- | | |
|---|--|
| 14. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
|---|--|

Drains

- | | |
|---|--|
| 15. The application area includes individual drain systems that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
|---|--|

If the response to Question VIII.X.15 is "NO," go to Question VIII.X.18.

- | | |
|--|--|
| 16. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
|--|--|

- | | |
|---|--|
| 17. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
|---|--|

- | | |
|--|--|
| 18. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of a thermoplastic product process unit. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
|--|--|

If the response to Question VIII.X.18 is "NO," go to Section VIII.Y.

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 67

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

X. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins (continued)

Drains (continued)

- | | | |
|-----|--|--|
| 19. | The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that meet the criteria listed in 40 CFR § 63.149(d) and § 63.1330(b)(12).
<i>If the response to Question VIII.X.19 is "NO," go to Section VIII.Y.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 20. | The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.1312, at any flow rate. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 21. | The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.1312, at an annual average flow rate greater than or equal to 10 liters per minute. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 22. | The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of an thermoplastic product process unit that is a new affected source or part of a new affected source and the equipment conveys water with a total annual average concentration greater than or equal to 10 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.1312, at an average annual flow rate greater than or equal to 0.02 liter per minute | <input type="checkbox"/> YES <input type="checkbox"/> NO |

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 68

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

Y. Subpart UUU - National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic reforming Units, and Sulfur Recovery Units.

- | | |
|--|---|
| 1. The application area is subject to 40 CFR Part 63, Subpart UUU - National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic reforming Units, and Sulfur Recovery Units. | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
|--|---|

Z. Subpart AAAA - National Emission Standards for Hazardous Air Pollutants for Municipal Solid Waste (MSW) Landfills.

- | | |
|--|---|
| ◆ 1. The application area is subject to 40 CFR Part 63, Subpart AAAA - National Emission Standards for Hazardous Air Pollutants for Municipal Solid Waste Landfills. | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
|--|---|

AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON)

- | | |
|--|---|
| 1. The application area is located at a site that includes process units that manufacture as a primary product one or more of the chemicals listed in 40 CFR § 63.2435(b)(1). | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| 2. The application area is located at a plant site that is a major source as defined in FCAA § 112(a). | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| 3. The application area is located at a site that includes miscellaneous chemical manufacturing process units (MCPU) that process, use or generate one or more of the organic hazardous air pollutants listed in § 112(b) of the Clean Air Act or hydrogen halide and halogen HAP.
<i>If the response to Question VIII.AA.1, AA.2 or AA.3 is "NO," go to Section VIII.BB.</i> | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| 4. The application area includes process vents, storage vessels, transfer racks, or waste streams associated with a miscellaneous chemical manufacturing process subject to 40 CFR 63, Subpart FFFF.
<i>If the response to Question VIII.AA.4 is "NO," go to Section VIII.BB.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 70

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

AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)

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

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 71

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

AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)

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

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 72

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

AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)

BB. Subpart GGGG - National Emission Standards for Hazardous Air Pollutants for: Solvent Extractions for Vegetable Oil Production.

- | | |
|--|---|
| 1. The application area includes a vegetable oil production process that: is by itself a major source of HAP emissions or, is collocated within a plant site with other sources that are individually or collectively a major source of HAP emissions. | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
|--|---|

CC. Subpart GGGGG - National Emission Standards for Hazardous Air Pollutants: Site Remediation

- | | |
|---|---|
| 1. The application area includes a facility at which a site remediation is conducted.
<i>If the answer to Question VIII.CC.1 is "NO," go to Section VIII.DD.</i> | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| 2. The application area is located at a site that is a major source of HAP.
<i>If the answer to Question VIII.CC.2 is "NO," go to Section VIII.DD.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 3. All site remediation's qualify for one of the exemptions contained in 40 CFR § 63.7881(b)(1) through (6).
<i>If the answer to Question VIII.CC.3 is "YES," go to Section VIII.DD.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 4. Prior to beginning site remediation activities it was determined that the total quantity of HAP listed in Table 1 of Subpart GGGGG that will be removed during all site remediations will be less than 1 Mg/yr.
<i>If the answer to Question VIII.CC.4 is "YES," go to Section VIII.DD.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 5. The site remediation will be completed within 30 consecutive calendar days. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 6. No site remediation will exceed 30 consecutive calendar days.
<i>If the answer to Question VIII.CC.6 is "YES," go to Section VIII.DD.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 7. Site remediation materials subject to 40 CFR Part 63, Subpart GGGGG are transferred from the application area to an off-site facility. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 8. All site remediation materials subject to 40 CFR Part 63, Subpart GGGGG are transferred from the application area to an off-site facility.
<i>If the answer to Question VIII.CC.8 is "YES," go to Section VIII.DD.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 73

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

CC. Subpart GGGGG - National Emission Standards for Hazardous Air Pollutants: Site Remediation (continued)

- | | | |
|-----|---|--|
| 9. | The application area includes containers that manage site remediation materials subject to 40 CFR Part 63, Subpart GGGGG.
<i>If the response to Question VIII.CC.9 is "NO," go to Question VIII.CC.14.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 10. | The application area includes containers using Container Level 1 controls as specified in 40 CFR § 63.922(b). | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 11. | The application area includes containers with a capacity greater than 0.46 m ³ that meet the requirements of 40 CFR § 63.7900(b)(3)(i) and (ii). | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 12. | The application area includes containers using Container Level 2 controls as specified in 40 CFR § 63.923(b). | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 13. | The application area includes containers using Container Level 3 controls as specified in 40 CFR § 63.924(b). | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 14. | The application area includes individual drain systems complying with the requirements of 40 CFR § 63.962. | <input type="checkbox"/> YES <input type="checkbox"/> NO |

DD. Subpart YYYYY - National Emission Standards for Hazardous Air Pollutants for Area/Sources: Electric Arc Furnace Steelmaking Facilities

- | | | |
|----|--|---|
| 1. | The application area includes an electric arc furnace (EAF) steelmaking facility, and the site is an area source of hazardous air pollutant (HAP) emissions.
<i>If the response to Question VIII.DD.1 is "NO," go to Section VIII.EE.</i> | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| 2. | The EAF steelmaking facility is a research and development facility.
<i>If the response to Question VIII.DD.2 is "YES," go to Section VIII.EE.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 3. | Metallic scrap is utilized in the EAF. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 4. | Scrap containing motor vehicle scrap is utilized in the EAF. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 5. | Scrap not containing motor vehicle scrap is utilized in the EAF. | <input type="checkbox"/> YES <input type="checkbox"/> NO |

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 77

X. Title 40 Code of Federal Regulations Part 82 (40 CFR Part 82) - Protection of Stratospheric Ozone (continued)

F. Subpart F - Recycling and Emissions Reduction

◆	1. Servicing, maintenance, and/or repair on refrigeration and non-motor vehicle air condition appliances using ozone-depleting refrigerants or non-exempt substitutes is conducted in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	2. Disposal of appliances (including motor vehicle air conditioners) or refrigerant or non-exempt substitute reclamation occurs in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
◆	3. The application area manufactures appliances or refrigerant recycling and recovery equipment.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A

G. Subpart G - Significant New Alternatives Policy Program

◆	1. The application area manufactures, formulates, or creates chemicals, product substitutes, or alternative manufacturing processes that are intended for use as a replacement for a Class I or Class II compound. <i>If the response to Question X.G.1 is "NO" or "N/A," go to Section X.H.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
◆	2. All substitutes produced by the application area meet one or more of the exemptions in 40 CFR § 82.176(b)(1) - (7).	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A

H. Subpart H -Halon Emissions Reduction

◆	1. Testing, servicing, maintaining, repairing, or disposing of equipment containing halons is conducted in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
◆	2. Disposal of halons or manufacturing of halon blends is conducted in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A

XI. Miscellaneous

A. Requirements Reference Tables (RRT) and Flowcharts

◆	1. The application area contains units that are potentially subject to a regulation for which the TCEQ has not developed an RRT and flowchart.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
---	--	---

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 78

XI. Miscellaneous (continued)

B. Forms

- | | | |
|---|--|---|
| ◆ | 1. The application area contains units that are potentially subject to a regulation for which the TCEQ has not developed a unit attribute form.
<i>If the response to Question XI.B.1 is "NO" or "N/A," go to Section XI.C.</i> | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<input type="checkbox"/> N/A |
| ◆ | 2. Provide the Part and Subpart designation for the federal rule(s) or the Chapter, Subchapter, and Division designation for the State regulation(s) in the space provided below. | |

C. Emission Limitation Certifications

- | | | |
|---|---|---|
| ◆ | 1. The application area includes units for which federally enforceable emission limitations have been established by certification. | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
|---|---|---|

D. Alternative Means of Control, Alternative Emission Limitation or Standard, or Equivalent Requirements

- | | | |
|---|---|---|
| ◆ | 1. The application area is located at a site that is subject to a site-specific requirement of the state implementation plan (SIP). | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| ◆ | 2. The application area includes units located at the site that are subject to a site-specific requirement of the SIP. | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| ◆ | 3. The application area includes units which demonstrate compliance by using an alternative means of control, alternative emission limitation or standard or equivalent requirements approved by the EPA Administrator.
<i>If the response to Question XI.D.3 is "YES," please include a copy of the approval document with the application.</i> | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| ◆ | 4. The application area includes units which demonstrate compliance by using an alternative means of control, alternative emission limitation or standard or equivalent requirements approved by the TCEQ Executive Director.
<i>If the response to Question XI.D.4 is "YES," please include a copy of the approval document with the application.</i> | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 79

XI. Miscellaneous (continued)

E. Title IV - Acid Rain Program

- | | |
|---|---|
| 1. The application area includes emission units subject to the Acid Rain Program (ARP), including the Opt-In Program. | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| 2. The application area includes emission units qualifying for the new unit exemption under 40 CFR § 72.7. | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| 3. The application area includes emission units qualifying for the retired unit exemption under 40 CFR § 72.8. | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |

F. 40 CFR Part 97, Subpart EEEEE - Cross-State Air Pollution Rule (CSAPR) NO_x Ozone Season Group 2 Trading Program

- | | |
|---|---|
| 1. The application area includes emission units subject to the requirements of the CSAPR NO _x Ozone Season Group 2 Trading Program.
<i>If the response to Question XI.F.1 is "NO," go to Question XI.F.7.</i> | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| 2. The application area includes units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart H for NO _x and heat input. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 3. The application area includes gas or oil-fired units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart H for NO _x , and the monitoring requirements of 40 CFR Part 75, Appendix D for heat input. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 4. The application area includes gas or oil-fired peaking units that are complying with the monitoring requirements of 40 CFR Part 75, Appendix E for NO _x , and the monitoring requirements of 40 CFR Part 75, Appendix D for heat input. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 5. The application area includes gas or oil-fired units that are complying with the Low Mass Emissions monitoring requirements of 40 CFR § 75.19 for NO _x and heat input. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 6. The application area includes units that are complying with EPA-approved alternative monitoring system requirements of 40 CFR Part 75, Subpart E for NO _x and heat input. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 7. The application area includes emission units that qualify for the CSAPR NO _x Ozone Season Group 2 retired unit exemption. | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 80

XI. Miscellaneous (continued)

G. 40 CFR Part 97, Subpart FFFFF - Texas SO₂ Trading Program

- | | | |
|----|---|---|
| 1. | The application area includes emission units complying with the requirements of the Texas SO ₂ Trading Program.
<i>If the response to Question XI.G.1 is "NO," go to Question XI.G.6.</i> | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| 2. | The application area includes units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart B for SO ₂ and 40 CFR Part 75, Subpart H for heat input. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 3. | The application area includes gas or oil-fired units that are complying with the monitoring requirements of 40 CFR Part 75, Appendix D for SO ₂ and heat input. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 4. | The application area includes gas or oil-fired units that are complying with the Low Mass Emissions monitoring requirements of 40 CFR § 75.19 for SO ₂ and heat input. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 5. | The application area includes units that are complying with EPA-approved alternative monitoring system requirements of 40 CFR Part 75, Subpart E for SO ₂ and heat input. | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 6. | The application area includes emission units that qualify for the Texas SO ₂ Trading Program retired unit exemption. | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |

H. Permit Shield (SOP Applicants Only)

- | | | |
|----|---|---|
| 1. | A permit shield for negative applicability entries on Form OP-REQ2 (Negative Applicable Requirement Determinations) is being requested or already exists in the permit. | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
|----|---|---|

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 81

XI. Miscellaneous (continued)

I. GOP Type (Complete this section for GOP applications only)

◆	1.	The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under GOP No. 511 - Oil and Gas General Operating Permit for Brazoria, Chambers, Collin, Dallas, Denton, El Paso, Ellis, Fort Bend, Galveston, Hardin, Harris, Jefferson, Johnson, Kaufman, Liberty, Montgomery, Orange, Parker, Rockwall, Tarrant, Waller, and Wise Counties.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	2.	The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under GOP No. 512 - Oil and Gas General Operating Permit for Gregg, Nueces, and Victoria Counties.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	3.	The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under GOP No. 513 - Oil and Gas General Operating Permit for Aransas, Bexar, Calhoun, Matagorda, San Patricio, and Travis Counties.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	4.	The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under GOP No. 514 - Oil and Gas General Operating Permit for All Texas Counties Except Aransas, Bexar, Brazoria, Calhoun, Chambers, Collin, Dallas, Denton, El Paso, Ellis, Fort Bend, Galveston, Gregg, Hardin, Harris, Jefferson, Johnson, Kaufman, Liberty, Matagorda, Montgomery, Nueces, Orange, Parker, Rockwall, San Patricio, Tarrant, Travis, Victoria, Waller, and Wise County.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	5.	The application area is applying for initial issuance, revision, or renewal of a solid waste landfill general operating permit under GOP No. 517 - Municipal Solid Waste Landfill general operating permit.	<input type="checkbox"/> YES <input type="checkbox"/> NO

J. Title 30 TAC Chapter 101, Subchapter H

◆	1.	The application area is located in a nonattainment area. <i>If the response to Question XI.J.1 is "NO," go to question XI.J.3.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	2.	The applicant has or will generate emission reductions to be credited in the TCEQ Emissions Banking and Trading Program.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
◆	3.	The applicant has or will generate discrete emission reductions to be credited in the TCEQ Emissions Banking and Trading Program.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 82

XI. Miscellaneous (continued)

J. Title 30 TAC Chapter 101, Subchapter H (continued)

◆	4.	The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area where the facilities have a collective uncontrolled design capacity to emit 10 tpy or more of NO _x .	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	5.	The application area includes an electric generating facility permitted under 30 TAC Chapter 116, Subchapter I.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	6.	The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area and the site has a potential to emit more than 10 tpy of highly-reactive volatile organic compounds (HRVOC) from facilities covered under 30 TAC Chapter 115, Subchapter H, Divisions 1 and 2.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	7.	The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area, the site has a potential to emit 10 tpy or less of HRVOC from covered facilities and the applicant is opting to comply with the requirements of 30 TAC Chapter 101, Subchapter H, Division 6, Highly Reactive VOC Emissions Cap and Trade Program.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

K. Periodic Monitoring

◆	1.	The applicant or permit holder is submitting at least one periodic monitoring proposal described on Form OP-MON in this application.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	2.	The permit currently contains at least one periodic monitoring requirement. <i>If the responses to Questions XI.K.1 and XI.K.2 are both "NO," go to Section XI.L.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	3.	All periodic monitoring requirements are being removed from the permit with this application.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 83

XI. Miscellaneous (continued)

L. Compliance Assurance Monitoring

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

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 84

XI. Miscellaneous (continued)

L. Compliance Assurance Monitoring (continued)

◆	9.	At least one of the CAM proposals as described by question XI.L.3 or XI.L.4 addresses particulate matter, and the emission unit has a capture system as defined in 40 CFR §64.1.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	10.	At least one of the CAM proposals as described by question XI.L.3 or XI.L.4 addresses VOC, and the emission unit has a capture system as defined in 40 CFR §64.1.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	11.	At least one of the CAM proposals as described by question XI.L.3 or XI.L.4 addresses a regulated pollutant other than particulate matter or VOC, and the emission unit has a capture system as defined in 40 CFR §64.1.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	12.	The control device in the CAM proposal as described by question XI.L.3 or XI.L.4 has a bypass.	<input type="checkbox"/> YES <input type="checkbox"/> NO

M. Title 30 TAC Chapter 113, Subchapter D, Division 5 - Emission Guidelines and Compliance Times

◆	1.	The application area includes at least one air curtain incinerator that commenced construction on or before December 9, 2004. <i>If the response to Question XI.M.1 is "NO," or "N/A," go to Section XII.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
◆	2.	All air curtain incinerators constructed on or before December 9, 2004 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	<input type="checkbox"/> YES <input type="checkbox"/> NO

XII. New Source Review (NSR) Authorizations

A. Waste Permits with Air Addendum

◆	1.	The application area includes a Municipal Solid Waste Permit or an Industrial Hazardous Waste with an Air Addendum. <i>If the response to XII.A.1 is "YES," include the waste permit numbers and issuance date in Section XII.J.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
---	----	---	---

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 85

XII. New Source Review (NSR) Authorizations (continued)

B. Air Quality Standard Permits

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

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 86

XII. New Source Review (NSR) Authorizations (continued)

B. Air Quality Standard Permits (continued)

◆	11. The application area includes at least one "Rock Crusher" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	12. The application area includes at least one "Electric Generating Unit" Air Quality Standard Permit NSR authorization. <i>If the response to XII.B.12 is "NO," go to Question XII.B.15.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	13. For purposes of "Electric Generating Unit" Air Quality Standard Permit, the application area is located in the East Texas Region.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	14. For purposes of "Electric Generating Unit" Air Quality Standard Permit, the application area is located in the West Texas Region.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	15. The application area includes at least one "Boiler" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	16. The application area includes at least one "Sawmill" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

C. Flexible Permits

1.	The application area includes at least one Flexible Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
----	---	---

D. Multiple Plant Permits

1.	The application area includes at least one Multi-Plant Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
----	--	---

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 87

XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)

E. PSD Permits and PSD Major Pollutants

PSD Permit No.:	Issuance Date:	Pollutant(s):
PSD Permit No.:	Issuance Date:	Pollutant(s):
PSD Permit No.:	Issuance Date:	Pollutant(s):
PSD Permit No.:	Issuance Date:	Pollutant(s):

If PSD Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html.

F. Nonattainment (NA) Permits and NA Major Pollutants

NA Permit No.:	Issuance Date:	Pollutant(s):
NA Permit No.:	Issuance Date:	Pollutant(s):
NA Permit No.:	Issuance Date:	Pollutant(s):
NA Permit No.:	Issuance Date:	Pollutant(s):

If NA Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html.

G. NSR Authorizations with FCAA § 112(g) Requirements

NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:

◆ **H. Title 30 TAC Chapter 116 Permits, Special Permits, Standard Permits, Other Authorizations (Other Than Permits By Rule, PSD Permits, NA Permits) for the Application Area**

Authorization No.: 80500	Issuance Date: 11/30/2018	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:

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

Date:	01/18/2024
Permit No.:	O4100
RN No.:	RN104363924

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 88

XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)

◆ **I. Permits by Rule (30 TAC Chapter 106) for the Application Area**

A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.

PBR No.: 106.183	Version No./Date: 09/04/2000
PBR No.: 106.227	Version No./Date: 09/04/2000
PBR No.: 106.265	Version No./Date: 09/04/2000
PBR No.: 106.473	Version No./Date: 09/04/2000
PBR No.: 106.478	Version No./Date: 09/04/2000
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
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:

Attachment V
Form OP-ACPS - Application Compliance Plan and Schedule

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

Date: 01/18/2024	Regulated Entity No.: RN104363924	Permit No.: O4100
Company Name: SPECIALTY COMPOSITES GROUP LTD		Area Name: Waco Composites Plant

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

Part 1

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

Attachment VI
Form OP-SUM - Individual Unit Summary

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

Table 1

Date	Permit No.	Regulated Entity No.
01/18/2024	O4100	RN104363924

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..
EU-1	OP-UA66	FRP Production		80500/11/30/2018		
EU-2	OP-UA5	OIL HEATER		106.183/09/04/2000		
EU-3	OP-UA5	OIL HEATER		106.183/09/04/2000		

Attachment VII
Form OP-PBRSUP - Permit By Rule Supplemental Table

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
01/18/2024	O4100	RN104363924

Unit ID No.	PBR No.	Version No./Date
EU-2	106.183	09/04/2000
EU-3	106.183	09/04/2000

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

Date	Permit Number	Regulated Entity Number
01/18/2024	O4100	RN104363924

PBR No.	Version No./Date
106.102	9/4/00
106.103	9/4/00
106.227	9/4/00
106.265	9/4/00
106.473	9/4/00

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
01/18/2024	O4100	RN104363924

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
EU-2	106.183	09/04/2000	Records of maximum heat input for boiler
EU-3	106.183	09/04/2000	Records of maximum heat input for boiler

Attachment VIII
Form OP-UA5 - Process Heater/Furnace Attributes

**Process Heater/Furnace Attributes
Form OP-UA5 (Page 4)
Federal Operating Permit Program
Table 2: Title 30 Texas Administrative Code Chapter 112 (30 TAC Chapter 112) Control of
Air Pollution from Sulfur Compounds
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
01/18/2024	O4100	RN104363924

Unit ID No.	SOP/GOP Index No.	Effective Stack Height	Emission Point ID No.
EU-2	63DDDDDD	YES	2
EU-3	63DDDDDD	YES	3

Process Heater/Furnace Attributes
Form OP-UA5 (Page 7)
Federal Operating Permit Program
Table 4: Title 30 Texas Administrative Code Chapter 111 (30 TAC Chapter 111)
Subchapter A, Division 2: Incineration
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
	O4100	RN104363924

Unit ID No.	SOP/GOP Index No.	Hazardous Waste	Monitor
EU-2	63DDDDDD	NO	
EU-3	63DDDDDD	NO	

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

Date	Permit No.	Regulated Entity No.
	O4100	RN104363924

Unit ID No.	SOP/GOP Index No.	Commence	Table Applicability	HCl Emission	HCl-CMS
EU-2	63DDDDDD	EXIST	T3.1G1		
EU-3	63DDDDDD	NEW	T3.1G1		

Attachment IX
Form OP-UA66 - Miscellaneous and Generic Unit Attributes

Reinforced Plastic Composites Production

Form OP-UA66 (Page 1)

Federal Operating Permit Program

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

Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
01/18/2024	O4100	RN104363924

Process ID No.	SOP Index No.	Production Process Type	Compliance Option	95% Reduction	Affected Source Type	Facility Type	Large Parts	Operation Type	CMS	Add-On Control Device
EU-1	63WWWW-1	WWWW	5805	95%NO	EXIST	100-	NOTLRG	CLSMLD		
EU-1	63WWWW-2	WWWW	5805	95%NO	EXIST	100-	NOTLRG	ONCRFIL	NO	NO

**Attachment X
Area Map**

Specialty Composites Group, LLC

Waco Composites Area Map



Attachment XI Plot Plan

Coordinates	UTMs - Zone 14	
	mE	mN
EPN 1	675629	3490534
Datum WGS84 (from Google Earth)		



Specialty Composites Group, LLC Waco Composites Plant Plot Plan

Attachment XII Process Description

PROCESS DESCRIPTION

Armor Plate Manufacturing

Fiberglass reinforced plastic (FRP) armor plates are manufactured at this site. Resin liquid is brought to the site in bulk via tank truck and stored in two 5,500-gallon storage tanks. Powdered catalyst is brought to the site in cardboard cases and mixed into the process from 20 lb bags. Filler powder is shipped to the site in bags and stored in the facility warehouse. When ready for processing, the resin is pumped to a shear mixing tank using hard piping. Catalyst and filler are then added to the mixing tank and all of the components are mixed together in the tank.

After mixing, the resin mixture is pumped to wet-out bath using a hose and pump. The wet-out bath is a shallow tank (i.e., 3' long X 6'wide X 6" deep). Continuous rolls of fiberglass fabric sheets are run through the wet-out bath, cut into sheets of a specified length, and then placed onto caul sheets. The number of FRP sheets placed onto each caul sheet depends on product specifications. Multiple caul sheets are then transferred to a lamination press for laminating and curing the FRP sheets together to form the armor plates. Two small heater heat oil used in the press to assist in curing the FRP sheets.

The caul sheets are then removed from the presses and the FRP armor plates are removed from the caul sheets. The armor plates are cut to size using a water-jet cutter. A small portion of the panels are face-sanded in one of two mechanical panel sanders.

Clean-up of all tools and equipment used in the process consists of cleaning the wet-out bath and the other pieces of equipment using propylene carbonate solvent.