Mr. Luna,

The signed OP-CRO1 has been submitted in STEERS.

Thanks,

Jenna

From: Ulises Luna <Ulises.Luna@tceq.texas.gov>
Sent: Monday, March 3, 2025 14:46
To: Timtiman, Jenna, Sekisui/US <Jenna.Timtiman@sekisui-sc.com>
Subject: RE: Working Draft Permit - FOP O2308/Project 36728 Sekisui Specialty Chemicals America LLC/Pasadena Plant

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Good afternoon,

Please submit/upload the final OP-CRO1 through <u>STEERS by March 7, 2025</u>, which includes the date of comment submittal in the documentation dates (We recommend a date range from the date of the submittal of application to the date of the submittal of the final OP-CRO1, so this will cover any updates during the project.)

Thanks, Ulises Luna (He, Him) Operating Permits Section Air Permits Division – TCEQ (512) 239-6640

From: Timtiman, Jenna, Sekisui/US <Jenna.Timtiman@sekisui-sc.com>
Sent: Monday, February 10, 2025 9:05 AM
To: Ulises Luna <Ulises.Luna@tceq.texas.gov>
Subject: RE: Working Draft Permit - FOP O2308/Project 36728 Sekisui Specialty Chemicals America LLC/Pasadena Plant

Mr. Luna,

Please see the revised OP-REQ1 and OP-PBRSUP.

Thanks, Jenna

From: Ulises Luna <<u>Ulises.Luna@tceq.texas.gov</u>>
Sent: Monday, February 3, 2025 4:51 PM
To: Timtiman, Jenna, Sekisui/US <<u>Jenna.Timtiman@sekisui-sc.com</u>>
Subject: RE: Working Draft Permit - FOP O2308/Project 36728 Sekisui Specialty Chemicals America
LLC/Pasadena Plant

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Good afternoon,

Yes, please provide the information by *February 12, 2025.*

Ulises Luna (He, Him) Operating Permits Section Air Permits Division – TCEQ (512) 239-6640

From: Timtiman, Jenna, Sekisui/US <<u>Jenna.Timtiman@sekisui-sc.com</u>>
Sent: Monday, February 3, 2025 3:54 PM
To: Ulises Luna <<u>Ulises.Luna@tceq.texas.gov</u>>
Subject: RE: Working Draft Permit - FOP O2308/Project 36728 Sekisui Specialty Chemicals America LLC/Pasadena Plant

Mr. Luna,

I will need additional time to put the information together. Would it be acceptable to send you the information by next week?

Thanks, Jenna

From: Ulises Luna <<u>Ulises.Luna@tceq.texas.gov</u>>
Sent: Friday, January 31, 2025 4:49 PM
To: Timtiman, Jenna, Sekisui/US <<u>Jenna.Timtiman@sekisui-sc.com</u>>
Subject: RE: Working Draft Permit - FOP O2308/Project 36728 Sekisui Specialty Chemicals America LLC/Pasadena Plant

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Good afternoon,

During the QAQC review, we noticed that a few issues in the permit:

- In the Permit, there was no indication of Chapter 111 term. Please provide an updated OP-REQ1 that indicates that the facility complies with Chapter 111. The facility must have 111.111(a)(1)(B) AND/OR unit specific requirements for 111.111(a)(1)(A), (a)(1)(B) and/or (a) (1)(C).
- OP-PBRSUP: There are several PBRs listed in the permit that have not been identified on the OP-PBRSUP. Please provide an updated OP-PBRSUP form with all the PBRs listed in the permit.

Please provide the information by February 4, 2025

Ulises Luna (He, Him) Operating Permits Section Air Permits Division – TCEQ (512) 239-6640

From: Timtiman, Jenna, Sekisui/US <<u>Jenna.Timtiman@sekisui-sc.com</u>>
Sent: Monday, January 27, 2025 8:31 AM
To: Ulises Luna <<u>Ulises.Luna@tceq.texas.gov></u>

Subject: RE: Working Draft Permit - FOP O2308/Project 36728 Sekisui Specialty Chemicals America LLC/Pasadena Plant

Mr. Luna,

Attached is the corrected OP-UA03 Form- Page 55.

Thanks, Jenna

From: Ulises Luna <<u>Ulises.Luna@tceq.texas.gov</u>>

Sent: Friday, January 24, 2025 12:03 PM

To: Timtiman, Jenna, Sekisui/US <<u>Jenna.Timtiman@sekisui-sc.com</u>>

Subject: RE: Working Draft Permit - FOP O2308/Project 36728 Sekisui Specialty Chemicals America LLC/Pasadena Plant

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Good morning,

Here's the updated Working Draft Permit.

Additionally, the following deficiencies has been identified:

• In Unit ID: GRP-PTKS - Index Number: 634-GRPPTKS-02 (OP-UA03 Form- Page 55), the facility put an "Yes" in CEMS section, it should be "No". Please provide the correct information.

Please provide any comments by January 29, 2025

Thanks, Ulises Luna (He, Him) Operating Permits Section Air Permits Division – TCEQ (512) 239-6640

From: Timtiman, Jenna, Sekisui/US <<u>Jenna.Timtiman@sekisui-sc.com</u>>
Sent: Monday, January 20, 2025 10:06 AM
To: Ulises Luna <<u>Ulises.Luna@tceq.texas.gov</u>>
Subject: RE: Working Draft Permit - FOP O2308/Project 36728 Sekisui Specialty Chemicals America LLC/Pasadena Plant

Mr. Luna,

Please see the attached response and documents you requested.

Thanks, Jenna Timtiman Senior Environmental Engineer Sekisui Specialty Chemicals America, LLC Office: (713) 456-1555 Mobile: (713) 444-4706

From: Ulises Luna <<u>Ulises.Luna@tceq.texas.gov</u>>
Sent: Tuesday, January 14, 2025 3:59 PM
To: Timtiman, Jenna, Sekisui/US <<u>Jenna.Timtiman@sekisui-sc.com</u>>
Subject: Working Draft Permit - FOP O2308/Project 36728 Sekisui Specialty Chemicals America
LLC/Pasadena Plant

This message was sent from outside the company. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Good afternoon,

I have conducted a technical review of *renewal* application for *Sekisui Specialty Chemicals America LLC/Pasadena Plant*. An electronic copy of the Working Draft Permit (WDP) is attached for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided.

Please review the WDP and submit to me any comments you have on the working draft permit by *January 21, 2025*.

Additionally, the following deficiencies has been identified:

- In Unit ID: 900-10.10 Index Number: 634F-10.10 (OP-UA03 Form), Please provide the missing information in Table 21d (Slotted Guidepole) regarding this index number.
- In Unit ID: 900-10.20 Index Number: 634-GRPPTKS-02 (OP-UA03 Form), Please provide the missing information Page 56 regarding this index number.

Note- Some units/modifications/requested items where not include in the Working Draft Permit due to deficiencies being found in the application/permit.

Please review the second portion of the "SOP Technical Review Fact Sheet" located at <u>http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pd</u> <u>f</u>. 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 <u>R6AirPermitsTX@epa.gov</u> and to the TCEQ regional office having jurisdiction. This

submittal information can be found on our website at <u>Where to Submit FOP Applications</u> and <u>Permit-Related Documents</u>.

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,

Ulises Luna (He, Him) Operating Permits Section Air Permits Division – TCEQ (512) 239-6640

From: Paige Cartwright <<u>Paige.Cartwright@tceq.texas.gov</u>>
Sent: Wednesday, August 28, 2024 4:44 PM
To: Timtiman, Jenna, Sekisui/US <<u>Jenna.Timtiman@sekisui-sc.com</u>>
Cc: Ulises Luna <<u>Ulises.Luna@tceq.texas.gov</u>>
Subject: New Permit Reviewer - FOP O2308/Project 36728 Sekisui Specialty Chemicals America LLC/Pasadena Plant

Jenna,

Please note that the new POC for this project going forward will be Mr. Ulises Luna (<u>Ulises.luna@tceq.texas.gov</u>). Please address all future correspondence to him. I have also copied Mr. Luna on this email thread to facilitate this transition.

Best,

Paige Cartwright Operating Permits Section – Team 2 Air Permits Division Texas Commission on Environmental Quality

From: Timtiman, Jenna, Sekisui/US <<u>Jenna.Timtiman@sekisui-sc.com</u>>
Sent: Wednesday, August 14, 2024 10:40 AM
To: Paige Cartwright <<u>Paige.Cartwright@tceq.texas.gov</u>>
Subject: RE: Technical Review - FOP O2308/Project 36728 Sekisui Specialty Chemicals America LLC/Pasadena Plant

Ms. Cartwright,

Please see the attached response that includes the documents you requested.

Thanks, Jenna Timtiman Senior Environmental Engineer Sekisui Specialty Chemicals America, LLC Office: (713) 456-1555 Mobile: (713) 444-4706

From: Paige Cartwright <<u>Paige.Cartwright@tceq.texas.gov</u>>
Sent: Friday, August 2, 2024 2:38 PM
To: Timtiman, Jenna, Sekisui/US <<u>Jenna.Timtiman@sekisui-sc.com</u>>
Subject: RE: Technical Review - FOP O2308/Project 36728 Sekisui Specialty Chemicals America LLC/Pasadena Plant

You don't often get email from paige.cartwright@tceq.texas.gov. Learn why this is important

This message was sent from outside the company. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Ms. Jenna Timtiman,

Upon my initial review of the submitted renewal application for Sekisui Specialty Chemicals America LLC/Pasadena Plant, the following issue(s) would need to be addressed before I can proceed with the permit review process, Could you please:

- Submit a revised OP-REQ1 page 87 that includes that <u>latest</u> issuance date for NSR 19618.
- Submit OP-MON forms for units 900-MAEC and 900-MEOH regarding regulation 30 TAC Chapter 115, Loading and Unloading of VOC.
- Submit OP-MON forms for units 900-10.70 and 900-10.80 for regulation 40 CFR Part 60, Subpart Kb regarding pollutant VOC.

It seems that the requirements for a few rules have been updated since your last renewal. Could you please:

- Submit revised unit attribute forms for units 900-10.20, 900-10.21, 900-10.22, 900-10.23, 900-10.24, and 900-10.25 for regulation 30 TAC Chapter 115, Loading and Unloading of VOC.
- Submit revised unit attribute forms for units 900-10.20, 900-10.21, 900-10.22, 900-10.23, 900-10.24, 900-10.25, and 900-D78.01 regarding regulation 40 CFR Part 63, Subpart FFFF for HAPs.
- Submit revised unit attribute forms for units 900-MEAC, 900-D78.01 and 900-MEOH regarding regulation 40 CFR Part 63, Subpart G.

Please submit all necessary documents at your earliest convenience but no later than, **August 16**, **2024.**

Please feel free to reach out with any questions or concerns regarding this permit renewal.

Best,

Paige Cartwright Operating Permits Section – Team 2 Air Permits Division Texas Commission on Environmental Quality

From: Paige Cartwright
Sent: Friday, July 12, 2024 3:42 PM
To: jenna.timtiman@sekisui-sc.com
Subject: Technical Review - FOP O2308/Project 36728 Sekisui Specialty Chemicals America LLC/Pasadena Plant

Ms. Jenna Timtiman:

I have been recently assigned to the Federal Operating Permit (FOP) renewal application of Permit No. O2308 for Sekisui Specialty Chemicals America LLC/Pasadena Plant. This application has been assigned Project No. 36728. Please address all correspondence pertaining to this permit application, including any updates, to me via email 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 highlevel 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 the <u>OP-PBRSUP</u> and <u>OP-REQ1</u> form instructions.

Please review the "<u>SOP Technical Review Fact Sheet</u>". 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.

Sincerely,

Paige Cartwright

Environmental Specialist I Air Permits Division Operating Permits Team 2 Texas Commission on Environmental Quality Phone: (512) 239 -1209 Paige.Cartwright@tceq.texas.gov



How is our customer service? Fill out our online customer satisfaction survey at //////www.tceq.texas.gov/customersurvey

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

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

I. Identifying Information				
RN: RN103012183				
CN: CN603507849				
Account No.: HX-2763-T				
Permit No.: O-2308				
Project No.: 36728				
Area Name: Pasadena PVOH Plant				
Company Name: Sekisui Specialty Chemicals Ame	erica, LLC			
II. Certification Type (Please mark appropria	ate box)			
Responsible Official Representative	Duly Authorized Representative			
III. Submittal Type (Please mark appropriate box) (Only one response can be accepted per form)				
SOP/TOP Initial Permit Application	Permit Revision, Renewal, or Reopening			
GOP Initial Permit Application				
Other:				

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

IV. Certification of Truth		where the second second second	Frank in the branch			
This certification does not extend to in	This certification does not extend to information which is designated by TCEQ as information for reference only.					
I, Jeffrey Thompson	certify that I	am the Responisible Of	ficial (RO)			
(Certifier Name printed			RO or DAR)			
and that, based on information and belief the time period or on the specific date(s) Note: Enter Either a Time Period or Spe certification is not valid without docume	below, are true, accurate, cific Date(s) for each cert	and complete:				
Time Period: From 06/11/2024	to	03/03/2025				
	(Start Date)	(-	End Date)			
Specific Dates:						
(Date 1)	(Date 2)	(Date 3)	(Date 4)			
(Date 5)		(Date 6)				
Signature:Signature Date: 3/3/25						
Title:						

Page _____ of ____

Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 1) Federal Operating Permit Program Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/6/2025	O-2308	RN103012183

For SOP applications, answer ALL questions unless otherwise directed.

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

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

Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 2) Federal Operating Permit Program Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/6/2025	O-2308	RN103012183

For SOP applications, answer ALL questions unless otherwise directed.

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

I.		tle 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and articulate Matter (continued)		
	В.	Materials Handling, Construction, Roads, Streets, Alleys, and Parking Lots		
	1.	Items a - d determine applicability of any of these requirements based on geographical location.		
٠		a. The application area is located within the city of El Paso.	🗌 Yes 🖾 No	
•		b. The application area is located within the Fort Bliss Military Reservation, except areas specified in 30 TAC § 111.141.	🗌 Yes 🖾 No	
♦		c. The application area is located in the portion of Harris County inside the loop formed by Beltway 8.	Xes No	
♦		d. The application area is located in the area of Nueces County outlined in Group II state implementation plan (SIP) for inhalable particulate matter adopted by the TCEQ on May 13, 1988.	🗌 Yes 🖾 No	
		If there is any "Yes" response to Questions I.B.1.a - d, answer 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.		
٠		a. The application area is subject to 30 TAC § 111.143.	🖾 Yes 🗌 No	
٠		b. The application area is subject to 30 TAC § 111.145.	🖂 Yes 🗌 No	
٠		c. The application area is subject to 30 TAC § 111.147.	🖂 Yes 🗌 No	
٠		d. The application area is subject to 30 TAC § 111.149.	🛛 Yes 🗌 No	
	C.	Emissions Limits on Nonagricultural Processes		
♦	1.	The application area includes a nonagricultural process subject to 30 TAC § 111.151.	🖂 Yes 🗌 No	
	2.	The application area includes a vent from a nonagricultural process that is subject to additional monitoring requirements. If the response to Question I.C.2 is "No," go to Question I.C.4.	□ Yes ⊠ No	
	3.	All vents from nonagricultural process in the application area are subject to additional monitoring requirements.	Yes No	

Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 3) Federal Operating Permit Program Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/6/2025	O-2308	RN103012183

For SOP applications, answer ALL questions unless otherwise directed.

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

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

Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 4) Federal Operating Permit Program Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/6/2025	O-2308	RN103012183

For SOP applications, answer ALL questions unless otherwise directed.

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

I.	Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter (continued)			
	E.	Outdoor Burning (continued)		
•	5.	Prescribed burning is used in the application area and subject to the exception provided in 30 TAC § 111.211.	🗌 Yes 🖾 No	
•	6.	Hydrocarbon burning is used in the application area and subject to the exception provided in 30 TAC § 111.213.	🗌 Yes 🖾 No	
•	7.	The application area has received the TCEQ Executive Director approval of otherwise prohibited outdoor burning according to 30 TAC § 111.215.	🗌 Yes 🖾 No	
II.	Title	30 TAC Chapter 112 - Control of Air Pollution from Sulfur Compounds		
	А.	Temporary Fuel Shortage Plan Requirements		
	1.	The application area includes units that are potentially subject to the temporary fuel shortage plan requirements of 30 TAC §§ 112.15 - 112.18.	Yes No	
III.	Title	30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds		
	А.	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.	Yes No	
		See instructions for inclusive counties. If the response to Question III.A.1 is "No," go to Section IV.		
	B.	Storage of Volatile Organic Compounds		
•	1.	The application area includes storage tanks, reservoirs, or other containers capable of maintaining working pressure sufficient at all times to prevent any VOC vapor or gas loss to the atmosphere.	🗌 Yes 🗌 No	

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
2/6/2025	O-2308	RN103012183

Unit ID No.	Registration No.	PBR No.	Registration Date
900-FLARE	140143	106.261 & 106.262	06/06/2016
900-HFUG	146138	106.261 & 106.262	04/28/2017
900-PFUG	147154	106.261	06/29/2017
STK1, STK2, STK3, STK4, STK5	151689	106.261 & 106.262	05/11/2018
900-PFUG	162314	106.261	09/10/2020
900-PFUG	169051	106.262	05/18/2022

Permit By Rule Supplemental Table (Page 2) Table B: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for the Application Area Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
2/6/2025	O-2308	RN103012183
Unit ID No.	PBR No.	Version No./Date
REGVLOAD, 900-HFUG, 900-PFUG	106.263	11/01/2001
MX-31.06, MX-32.06, E-52.17	106.264	09/04/2000
900-PFUG	106.373	09/04/2000
900-PFUG	106.452	09/04/2000
900-PFUG	106.454	11/01/2001
ТК-72.03, ТК-72.07	106.472	09/04/2000
900-VAT	106.473	09/04/2000
EG1	106.511	09/04/2000

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

Date	Permit Number	Regulated Entity Number
2/6/2025	O-2308	RN103012183

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement	
900-FLARE	106.261 & 106.262	140143	Duration of when backup flare is in operation is tracked and docurmented.	
900-HFUG	106.261 & 106.262	146138	28 VHP.	
900-PFUG	106.261	147154	28 VHP.	
900-PFUG	106.262	169051	28 VHP.	
REGVLOAD, 900-HFUG, 900-PFUG	106.263	11/01/2001	Date, time, and duration of event is documented.	
900-PFUG	106.373	09/04/2000	Type of refrigerant is documented.	
900-PFUG	106.454	11/01/2001	Total solvent makeup is documented.	
TK-72.03, TK-72.07	106.472	09/04/2000	Loading activity is documented.	
900-VAT	106.473	09/04/2000	Loading activity is documented.	
EG1	106.511	09/04/2000	Run time meters records to document hours in use.	
STK1, STK2, STK3, STK4, STK5	151689	05/11/2018	Each operational event is documented	

From:	Timtiman, Jenna, Sekisui/US <jenna.timtiman@sekisui-sc.com></jenna.timtiman@sekisui-sc.com>
Sent:	Wednesday, August 14, 2024 10:40 AM
То:	Paige Cartwright
Subject:	RE: Technical Review - FOP O2308/Project 36728 Sekisui Specialty Chemicals
	America LLC/Pasadena Plant
Attachments:	Sekisui TV O2308 Response to TCEQ Questions.pdf

Ms. Cartwright,

Please see the attached response that includes the documents you requested.

Thanks, Jenna Timtiman Senior Environmental Engineer Sekisui Specialty Chemicals America, LLC Office: (713) 456-1555 Mobile: (713) 444-4706

From: Paige Cartwright <<u>Paige.Cartwright@tceq.texas.gov</u>>
Sent: Friday, August 2, 2024 2:38 PM
To: Timtiman, Jenna, Sekisui/US <<u>Jenna.Timtiman@sekisui-sc.com</u>>
Subject: RE: Technical Review - FOP O2308/Project 36728 Sekisui Specialty Chemicals America
LLC/Pasadena Plant

You don't often get email from paige.cartwright@tceq.texas.gov. Learn why this is important

This message was sent from outside the company. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Ms. Jenna Timtiman,

Upon my initial review of the submitted renewal application for Sekisui Specialty Chemicals America LLC/Pasadena Plant, the following issue(s) would need to be addressed before I can proceed with the permit review process, Could you please:

- Submit a revised OP-REQ1 page 87 that includes that <u>latest</u> issuance date for NSR 19618.
- Submit OP-MON forms for units 900-MAEC and 900-MEOH regarding regulation 30 TAC Chapter 115, Loading and Unloading of VOC.
- Submit OP-MON forms for units 900-10.70 and 900-10.80 for regulation 40 CFR Part 60, Subpart Kb regarding pollutant VOC.

It seems that the requirements for a few rules have been updated since your last renewal. Could you please:

• Submit revised unit attribute forms for units 900-10.20, 900-10.21, 900-10.22, 900-10.23, 900-10.24, and 900-10.25 for regulation 30 TAC Chapter 115, Loading and Unloading of VOC.

- Submit revised unit attribute forms for units 900-10.20, 900-10.21, 900-10.22, 900-10.23, 900-10.24, 900-10.25, and 900-D78.01 regarding regulation 40 CFR Part 63, Subpart FFFF for HAPs.
- Submit revised unit attribute forms for units 900-MEAC, 900-D78.01 and 900-MEOH regarding regulation 40 CFR Part 63, Subpart G.

Please submit all necessary documents at your earliest convenience but no later than, **August 16**, **2024**.

Please feel free to reach out with any questions or concerns regarding this permit renewal.

Best,

Paige Cartwright Operating Permits Section – Team 2 Air Permits Division Texas Commission on Environmental Quality

From: Paige Cartwright
Sent: Friday, July 12, 2024 3:42 PM
To: jenna.timtiman@sekisui-sc.com
Subject: Technical Review - FOP O2308/Project 36728 Sekisui Specialty Chemicals America LLC/Pasadena Plant

Ms. Jenna Timtiman:

I have been recently assigned to the Federal Operating Permit (FOP) renewal application of Permit No. O2308 for Sekisui Specialty Chemicals America LLC/Pasadena Plant. This application has been assigned Project No. 36728. Please address all correspondence pertaining to this permit application, including any updates, to me via email 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 highlevel 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 the <u>OP-PBRSUP</u> and <u>OP-REQ1</u> form instructions.

Please review the "<u>SOP Technical Review Fact Sheet</u>". 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.

Sincerely,

Paige Cartwright Environmental Specialist I Air Permits Division Operating Permits Team 2 Texas Commission on Environmental Quality Phone: (512) 239 -1209 Paige.Cartwright@tceq.texas.gov



How is our customer service? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey



Sekisui Specialty Chemicals America, LLC.

August 14, 2024

Paige Cartwright TCEQ Air Permits Division Operating Permits Team 2 P.O. Box 13087 Austin, TX 78711 ELECTRONIC MAIL Paige.Cartwright@tceq.texas.gov

Subject: Title V 0-2308 Renewal Application TCEQ Project Number 36728 Sekisui Specialty Chemicals America, LLC Pasadena, Harris County, Texas Regulated Entity Number: RN103012183 Customer Reference Number: CN603507849 TCEQ Account Number: HX-2763-T

Ms. Cartwright,

Sekisui Specialty Chemicals America, LLC (Sekisui) is submitting this response to provide the forms requested by the Texas Commission on Environmental Quality (TCEQ) via email on August 2, 2024. We trust that the enclosed attachments provide sufficient information to answer your questions. The following is enclosed:

- Attachment 1: Updated OP-REQ1 Form Page 87
- Attachment 2: OP-MON Forms
- Attachment 3: OP-UA3 Tables 4 and 21
- Attachment 4: OP-UA15 Tables 6 and 13
- Attachment 5: OP-UA4 Table 7

If you have any comments and/or concerns regarding this submittal or require additional information, please do not hesitate to contact me at (713) 456-1555 or email: <u>Jenna.Timtiman@sekisui-sc.com</u>.

Sincerely,

Jenna Timtiman Senior Environmental Engineer

> Sekisui Specialty Chemicals America, LLC 1423 Pasadena Freeway, Pasadena, TX 77506 Phone: 713-456-1500 Fax: 713-456-1554

Submit a revised OP-REQ1 page 87 that includes that <u>latest</u> issuance date for NSR 19618.

An updated OP-REQ1 page 87 is being submitted as Attachment 1 and includes the latest issuance date for NSR 19618.

Submit OP-MON forms for units 900-MEAC and 900-MEOH regarding regulation 30 TAC Chapter 115, Loading and Unloading of VOC.

An OP-MON which includes units 900-MEAC and 900-MEOH is being submitted as Attachment 2.

Submit OP-MON forms for units 900-10.70 and 900-10.80 for regulation 40 CFR Part 60, Subpart Kb regarding pollutant VOC.

An OP-MON which includes units 900-10.70 and 900-10.80 is being submitted as Attachment 2.

Submit revised unit attribute forms for units 900-10.20, 900-10.21, 900-10.22, 900-10.23, 900-10.24, and 900-10.25 for regulation 30 TAC Chapter 115, Loading and Unloading of VOC.

Units 900-10.20, 900-10.21, 900-10.22, 900-10.23, 900-10.24, and 900-10.25 are part of Group ID GRP-PTKS. These units are tanks and not applicable to Loading and Unloading requirements under Chapter 115 but are subject to Storage of VOCs requirements; therefore, Sekisui is submitting an updated form OP-UA3 Table 4 with this group's attributes as Attachment 3.

Submit revised unit attribute forms for units 900-10.20, 900-10.21, 900-10.22, 900-10.23, 900-10.24, 900-10.25, and 900-D78.01 regarding regulation 40 CFR Part 63, Subpart FFFF for HAPs.

Units 900-10.20, 900-10.21, 900-10.22, 900-10.23, 900-10.24, and 900-10.25 are part of Group ID GRP-PTKS; Form OP-UA3 Table 21 is being submitted as Attachment 3 for this group. Additionally, Attachment 4 contains OP-UA15 Table 13 for unit attributes for Unit ID 900-D78.01.

Submit revised unit attribute forms for units 900-MEAC, 900-D78.01 and 900-MEOH regarding regulation 40 CFR Part 63, Subpart G.

OP-UA15 Table 6 contains unit attributes for Unit ID 900-D78.01 and are submitted in Attachment 4. Additionally, unit attributes for Unit IDs 900-MEAC and 900-MEOH are included in OP-UA4 Table 7 and are submitted under Attachment 5.

Attachment 1: Updated OP-REQ1 Form Page 87

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

Date:	08/16/2024
Permit No.:	O-2308
RN No.:	RN103012183

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)						
	· · ·					
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 j Technical Forms heading						
F. Nonattainm	ent (NA) Pe	rmits and NA Major	Pollutar	nts		
NA Permit No.:		Issuance Date:		Pollutant(s):		
NA Permit No.:		Issuance Date:		Pollutant(s):		
NA Permit No.:		Issuance Date:		Pollutant(s):		
NA Permit No.:		Issuance Date:		Pollutant(s):		
If NA Permits are held fo Technical Forms heading						
G. NSR Author	rizations wit	h FCAA § 112(g) Re	quireme	nts		
NSR Permit No.:	Issuanc	e Date:	NSR Pe	ermit No.:	Issuance Date:	
NSR Permit No.:	Issuanc	e Date:	NSR Pe	ermit No.:	Issuance Date:	
NSR Permit No.:	Issuanc	e Date:	NSR Pe	ermit No.:	Issuance Date:	
NSR Permit No.:	Issuanc	e Date:	NSR Pe	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.: 19618	Issuanc	e Date: 12/21/2018	Authori	zation No.:	Issuance Date:	
Authorization No.:	Issuanc	e Date:	Authori	zation No.:	Issuance Date:	
Authorization No.:	Issuance Date: Au		Authori	zation No.:	Issuance Date:	
Authorization No.:	Issuanc	e Date:	Authori	zation No.:	Issuance Date:	

Attachment 2: OP-MON Forms

Texas Commission on Environmental Quality Monitoring Requirements Form OP-MON (Page 3) Federal Operating Permit Program Table 1c: CAM/PM Case-By-Case Additions

Ι.	Identifying Information				
Acco	ount No.: HX-2763-T	RN No.: RN103	012183	CN: CN603507849	
Pern	nit No: O-2308		Project No.: 367	28	
Area	Name: Pasadena Plant				
Com	ipany Name: Sekisui Specialty C	hemicals Ameri	ca, LLC		
II.	Unit/Emission Point/Group/Pro	cess Informatio	on		
Revi	sion No.: N/A				
Unit/	EPN/Group/Process ID No.: 900-I	MEAC			
Appl	icable Form: OP-UA4				
III.	Applicable Regulatory Require	ment			
Nam	e: 30 TAC Chapter 115, Loading	and Unloading	of VOC		
SOF	/GOP Index No.: R5212-01				
Pollu	utant: VOC				
Mair	n Standard: §115.212(a)(1)				
Mon	itoring Type: PM				
Unit	Size:				
				ooiler. All periods when the boiler is ered and reported as a deviation.	
IV.	Control Device Information				
Cont	trol Device ID No.: 800-B.1550				
Devi	ce Type: BOIL2				
۷.	CAM Case-by-case				
Indic	cator:				
Mini	Minimum Frequency:				
Averaging Period:					
QA/0	QA/QC Procedures:				
Verification Procedures:					
Representative Date:					
VI.	VI. Periodic Monitoring Case-by-case				
Indic	cator: Period of Operation		Minimum Frequ	uency: N/A	
Aver	aging Period: N/A				

I. Identifying Information

Periodic Monitoring Text:

A common way to control VOC emissions is to route emissions to a boiler or process heater with a design heat input capacity of 44 MW or greater with minimum temperatures of 1100 °C and residence times greater than one second. Boilers and process heaters with the stated design have demonstrated to meet 98% reduction efficiency; therefore, it is only necessary to document the period of operation of the control equipment. Additionally, in the October 21, 1983, preamble to 40 CFR Part 60, Subpart III, (48 FR 48945), the EPA determined that installing a steam generating unit, with a design heat input capacity of 44 MW or greater, to control VOC emissions, is an acceptable means of demonstrating compliance with 40 CFR Part 60, Subpart III and waived the requirement for a performance test on such devices. Monitoring the period of operation of a boiler/process heater greater than 44 MW is commonly required in federal rules, including: 40 CFR Part 60, Subpart SII and NNN; 40 CFR Part 61, Subpart BB; 40 CFR Part 63, Subpart G.

Texas Commission on Environmental Quality Monitoring Requirements Form OP-MON (Page 3) Federal Operating Permit Program Table 1c: CAM/PM Case-By-Case Additions

١.	Identifying Information				
Acco	ount No.: HX-2763-T	RN No.: RN103	012183	CN: CN603507849	
Perm	nit No: O-2308		Project No.: 367	28	
Area	Name: Pasadena Plant				
Com	pany Name: Sekisui Specialty C	hemicals Ameri	ca, LLC		
П.	Unit/Emission Point/Group/Pro	cess Informatio	n		
Revi	sion No.: N/A				
Unit/	EPN/Group/Process ID No.: 900-N	ИЕОН			
Appli	icable Form: OP-UA4				
III.	Applicable Regulatory Require	ment			
Nam	e: 30 TAC Chapter 115, Loading	and Unloading	of VOC		
SOP	/GOP Index No.: R5212-01				
Pollu	itant: VOC				
Main	1 Standard: §115.212(a)(1)				
Moni	itoring Type: PM				
Unit	Size:				
				ooiler. All periods when the boiler is ered and reported as a deviation.	
IV.	Control Device Information				
Cont	Control Device ID No.: 800-B.1550				
Devi	ce Type: BOIL2				
V.	CAM Case-by-case				
Indic	ator:				
Minir	Minimum Frequency:				
Aver	Averaging Period:				
QA/C	QA/QC Procedures:				
Verif	Verification Procedures:				
Repr	esentative Date:				
VI.	VI. Periodic Monitoring Case-by-case				
Indic	ator: Period of Operation		Minimum Frequ	uency: N/A	
Aver	aging Period: N/A				

I. Identifying Information

Periodic Monitoring Text:

A common way to control VOC emissions is to route emissions to a boiler or process heater with a design heat input capacity of 44 MW or greater with minimum temperatures of 1100 °C and residence times greater than one second. Boilers and process heaters with the stated design have demonstrated to meet 98% reduction efficiency; therefore, it is only necessary to document the period of operation of the control equipment. Additionally, in the October 21, 1983, preamble to 40 CFR Part 60, Subpart III, (48 FR 48945), the EPA determined that installing a steam generating unit, with a design heat input capacity of 44 MW or greater, to control VOC emissions, is an acceptable means of demonstrating compliance with 40 CFR Part 60, Subpart III and waived the requirement for a performance test on such devices. Monitoring the period of operation of a boiler/process heater greater than 44 MW is commonly required in federal rules, including: 40 CFR Part 60, Subparts III and NNN; 40 CFR Part 61, Subpart BB; 40 CFR Part 63, Subpart G.

Texas Commission on Environmental Quality Monitoring Requirements Form OP-MON (Page 3) Federal Operating Permit Program Table 1c: CAM/PM Case-By-Case Additions

Ι.	Identifying Information				
Acco	ount No.: HX-2763-T	RN No.: RN103	012183	CN: CN603507849	
Perm	nit No: O-2308		Project No.: 367	28	
Area	Name: Pasadena Plant				
Com	pany Name: Sekisui Specialty C l	hemicals Ameri	ca, LLC		
П.	Unit/Emission Point/Group/Pro	cess Informatio	n		
Revi	sion No.: N/A				
Unit/	EPN/Group/Process ID No.: 900-1	10.70			
Appli	icable Form: OP-UA3				
III.	Applicable Regulatory Require	ment			
Nam	e: 40 CFR Part 60, Subpart Kb				
SOP	/GOP Index No.: 60KB-02				
Pollu	itant: VOC				
Main	Standard: [G]§60.112b(a)(3)				
Moni	itoring Type: PM				
Unit	Size:				
	ation Limit: It shall be considered ter at above background and/or				
IV.	Control Device Information				
Cont	rol Device ID No.:				
Devi	се Туре:				
V .	CAM Case-by-case				
Indic	ator:				
Minir	Minimum Frequency:				
Aver	Averaging Period:				
QA/C	QA/QC Procedures:				
Verif	Verification Procedures:				
Repr	Representative Date:				
VI. Periodic Monitoring Case-by-case					
Indic	ator: VOC Concentration		Minimum Frequ	uency: Once per year	
Aver	aging Period: N/A				

I. Identifying Information

Periodic Monitoring Text:

It is widely practiced and accepted to monitor the VOC concentration at the outlet of a control device by use of a portable analyzer with procedures such as EPA Test Method 25A or a VOC CEMS. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Outlet VOC concentration has been used as an indicator of VOC emissions in many federal rules including 40 CFR Part 60, Subpart III, 40 CFR Part 60, Subpart NNN, 40 CFR Part 60, Subpart RRR, 40 CFR Part 61, Subpart BB, 40 CFR Part 61, Subpart FF, 40 CFR Part 63, Subpart R, 40 CFR Part 63, Subpart DD, and 40 CFR Part 63, Subpart HH.

Texas Commission on Environmental Quality Monitoring Requirements Form OP-MON (Page 3) Federal Operating Permit Program Table 1c: CAM/PM Case-By-Case Additions

١.	Identifying Information				
Acco	ount No.: HX-2763-T	RN No.: RN103	012183	CN: CN603507849	
Pern	nit No: O-2308		Project No.: 367	28	
Area	Name: Pasadena Plant				
Com	ipany Name: Sekisui Specialty C	hemicals Ameri	ca, LLC		
II.	Unit/Emission Point/Group/Pro	cess Informatio	on		
Revi	sion No.: N/A				
Unit/	EPN/Group/Process ID No.: 900-1	10.70			
Appl	icable Form: OP-UA3				
III.	Applicable Regulatory Require	ment			
Nam	e: 40 CFR Part 60, Subpart Kb				
SOF	P/GOP Index No.: 60KB-02				
Pollu	utant: VOC				
Mair	n Standard: [G]§60.112b(a)(3)				
Mon	itoring Type: PM				
Unit	Size:				
	ation Limit: It shall be considered components are not inspected.	d a deviation if c	lefects in the cl	osed vent system are detected or if	
IV.	Control Device Information				
Cont	trol Device ID No.:				
Devi	се Туре:				
V.	CAM Case-by-case				
Indic	ator:				
Mini	mum Frequency:				
Aver	Averaging Period:				
QA/0	QA/QC Procedures:				
Verif	Verification Procedures:				
Rep	resentative Date:				
VI.	VI. Periodic Monitoring Case-by-case				
Indic	ator: Visual Inspection		Minimum Frequ	uency: Once per year	
Aver	aging Period: N/A				

I. Identifying Information

Periodic Monitoring Text:

It is widely practiced and accepted to use work practice as a monitoring option to demonstrate compliance. Preventive maintenance and visual inspections of control equipment, as recommended by the manufacturer, conducted by the owner or operator can ensure that the unit is operating properly. The work practice requirements prescribe that preventive maintenance and/or visual inspections be performed and recorded in a log. This option assures that the owner or operator is adequately maintaining the control equipment.

Texas Commission on Environmental Quality Monitoring Requirements Form OP-MON (Page 3) Federal Operating Permit Program Table 1c: CAM/PM Case-By-Case Additions

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Ι.					
Acco	ount No.: HX-2763-T	RN No.: RN10301	12183	CN: CN603507849	
Pern	nit No: O-2308	F	Project No.: 36	728	
Area	Name: Pasadena Plant				
Com	ipany Name: Sekisui Specialty C	hemicals America	a, LLC		
II.	Unit/Emission Point/Group/Pro	ocess Information	l		
Revi	sion No.: N/A				
Unit/	EPN/Group/Process ID No.: 900-1	10.70			
Appl	icable Form: OP-UA3				
III.	Applicable Regulatory Require	ement			
Nam	ie: 40 CFR Part 60, Subpart Kb				
SOP	P/GOP Index No.: 60KB-02				
Pollu	utant: VOC				
Mair	n Standard: [G]§60.112b(a)(3)				
Mon	itoring Type: PM				
Unit	Size:				
Devi	ation Limit: Minimum liquid flow	to Acetic Acid Sc	rubber shall	be 60 gallons per hour.	
IV.	Control Device Information				
Cont	trol Device ID No.: 987-SCRUB				
Devi	ce Type: WETSCR				
V.	CAM Case-by-case				
Indic	cator:				
Minii	mum Frequency:				
Aver	Averaging Period:				
QA/0	QA/QC Procedures:				
Verification Procedures:					
Representative Date:					
VI.	Periodic Monitoring Case-by-c	ase			
Indic	ator: Scrubber inlet liquid flow r	ate	Minimum Fred	uency: Continuously	
Aver	Averaging Period: 1 hour				

I. Identifying Information

Periodic Monitoring Text:

To comply with the applicable emission limit, a minimum water flow rate must be supplied to the scrubber to absorb a given amount of VOC in the gas streams, given the size of the tower and height of the stack. The liquid to gas (L/G) ratio is a key operating parameter of the scrubber. If the L/G ratio decreases below the minimum, sufficient mass transfer of the pollutant from the gas phase to the liquid phase will not occur. The minimum liquid flow required to maintain the proper L/G ratio at the maximum gas flow and vapor loading through the scrubber can be determined.

The deviation limit was selected based on engineering calculations using ASPEN® process modeling software. Computer modeling of the scrubber system was performed to demonstrate that at a minimum liquid flow of 60 gallons per hour, the scrubber achieves the 99% collection efficiency.

Texas Commission on Environmental Quality Monitoring Requirements Form OP-MON (Page 3) Federal Operating Permit Program Table 1c: CAM/PM Case-By-Case Additions

Ι.	Identifying Information						
Acco	ount No.: HX-2763-T	RN No.: RN103	012183	CN: CN603507849			
Perm	Permit No: O-2308 Project No.: 36728						
Area	Name: Pasadena Plant						
Com	pany Name: Sekisui Specialty C l	hemicals Ameri	ca, LLC				
П.	Unit/Emission Point/Group/Pro	ocess Informatio	n				
Revi	sion No.: N/A						
Unit/	EPN/Group/Process ID No.: 900-1	10.80					
Appli	icable Form: OP-UA3						
III.	Applicable Regulatory Require	ment					
Nam	e: 40 CFR Part 60, Subpart Kb						
SOP	/GOP Index No.: 60KB-02						
Pollu	itant: VOC						
Main	Standard: [G]§60.112b(a)(3)						
Moni	itoring Type: PM						
Unit	Size:						
	ation Limit: It shall be considered ter at above background and/or						
IV.	Control Device Information						
Cont	rol Device ID No.:						
Devi	се Туре:						
V .	CAM Case-by-case						
Indic	ator:						
Minir	num Frequency:						
Aver	aging Period:						
QA/C	QC Procedures:						
Verif	ication Procedures:						
Repr	esentative Date:						
VI.	Periodic Monitoring Case-by-ca	ase					
Indic	ator: VOC Concentration		Minimum Frequ	uency: Once per year			
Aver	aging Period: N/A						

I. Identifying Information

Periodic Monitoring Text:

It is widely practiced and accepted to monitor the VOC concentration at the outlet of a control device by use of a portable analyzer with procedures such as EPA Test Method 25A or a VOC CEMS. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Outlet VOC concentration has been used as an indicator of VOC emissions in many federal rules including 40 CFR Part 60, Subpart III, 40 CFR Part 60, Subpart NNN, 40 CFR Part 60, Subpart RRR, 40 CFR Part 61, Subpart BB, 40 CFR Part 61, Subpart FF, 40 CFR Part 63, Subpart R, 40 CFR Part 63, Subpart DD, and 40 CFR Part 63, Subpart HH.

Texas Commission on Environmental Quality Monitoring Requirements Form OP-MON (Page 3) Federal Operating Permit Program Table 1c: CAM/PM Case-By-Case Additions

١.	Identifying Information						
Acco	ount No.: HX-2763-T	RN No.: RN103	012183	CN: CN603507849			
Pern	ermit No: O-2308 Project No.: 36728						
Area	Name: Pasadena Plant						
Com	ipany Name: Sekisui Specialty C	hemicals Ameri	ca, LLC				
II.	Unit/Emission Point/Group/Pro	cess Informatio	on				
Revi	sion No.: N/A						
Unit/	EPN/Group/Process ID No.: 900-1	10.80					
Appl	icable Form: OP-UA3						
III.	Applicable Regulatory Require	ment					
Nam	e: 40 CFR Part 60, Subpart Kb						
SOF	P/GOP Index No.: 60KB-02						
Pollu	utant: VOC						
Mair	n Standard: [G]§60.112b(a)(3)						
Mon	itoring Type: PM						
Unit	Size:						
	ation Limit: It shall be considered components are not inspected.	d a deviation if c	defects in the cl	osed vent system are detected or if			
IV.	Control Device Information						
Cont	trol Device ID No.:						
Devi	се Туре:						
V.	CAM Case-by-case						
Indic	cator:						
Mini	mum Frequency:						
Aver	aging Period:						
QA/0	QC Procedures:						
Verif	ication Procedures:						
Rep	resentative Date:						
VI.	Periodic Monitoring Case-by-ca	ase					
Indic	ator: Visual Inspection		Minimum Frequ	uency: Once per year			
Aver	aging Period: N/A						

I. Identifying Information

Periodic Monitoring Text:

It is widely practiced and accepted to use work practice as a monitoring option to demonstrate compliance. Preventive maintenance and visual inspections of control equipment, as recommended by the manufacturer, conducted by the owner or operator can ensure that the unit is operating properly. The work practice requirements prescribe that preventive maintenance and/or visual inspections be performed and recorded in a log. This option assures that the owner or operator is adequately maintaining the control equipment.

Texas Commission on Environmental Quality Monitoring Requirements Form OP-MON (Page 3) Federal Operating Permit Program Table 1c: CAM/PM Case-By-Case Additions

١.	Identifying Information						
Acco	count No.: HX-2763-T RN No.: RN103012183 CN: CN603507849						
Pern	nit No: O-2308		Project No.: 367	28			
Area	Name: Pasadena Plant						
Com	pany Name: Sekisui Specialty C	hemicals Ameri	ca, LLC				
II.	Unit/Emission Point/Group/Pro	ocess Informatio	on				
Revi	sion No.: N/A						
Unit/	EPN/Group/Process ID No.: 900-1	10.80					
Appl	icable Form: OP-UA3						
III.	Applicable Regulatory Require	ement					
Nam	e: 40 CFR Part 60, Subpart Kb						
SOP	/GOP Index No.: 60KB-02						
Pollu	itant: VOC						
Main	n Standard: [G]§60.112b(a)(3)						
Mon	itoring Type: PM						
Unit	Size:						
Devi	ation Limit: Minimum liquid flow	to Acetic Acid S	Scrubber shall k	be 60 gallons per hour.			
IV.	Control Device Information						
Cont	rol Device ID No.: 987-SCRUB						
Devi	ce Type: WETSCR						
۷.	CAM Case-by-case						
Indic	ator:						
Minir	mum Frequency:						
Aver	aging Period:						
QA/0	QC Procedures:						
Verif	ication Procedures:						
Repr	resentative Date:						
VI.	Periodic Monitoring Case-by-c	ase					
Indic	ator: Scrubber inlet liquid flow r	ate	Minimum Frequ	uency: Continuously			
Aver	aging Period: 1 hour						

I. Identifying Information

Periodic Monitoring Text:

To comply with the applicable emission limit, a minimum water flow rate must be supplied to the scrubber to absorb a given amount of VOC in the gas streams, given the size of the tower and height of the stack. The liquid to gas (L/G) ratio is a key operating parameter of the scrubber. If the L/G ratio decreases below the minimum, sufficient mass transfer of the pollutant from the gas phase to the liquid phase will not occur. The minimum liquid flow required to maintain the proper L/G ratio at the maximum gas flow and vapor loading through the scrubber can be determined.

The deviation limit was selected based on engineering calculations using ASPEN® process modeling software. Computer modeling of the scrubber system was performed to demonstrate that at a minimum liquid flow of 60 gallons per hour, the scrubber achieves the 99% collection efficiency.

Attachment 3: OP-UA3 Tables 4 and 21

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

Date	Permit No.	Regulated Entity No.
08/16/2024	O-2308	RN103012183

Unit ID No.	SOP/GOP Index No.	Alternate Control Requirement	ACR ID No.	Product Stored	Storage Capacity	Throughput	Potential to Emit	Uncontrolled Emissions
GRP-PTKS	R5112-01	NO		VOC1	A40K+			
GRP-PTKS	R5112-02	NO		VOC1	A40K+			

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

Date	Permit No.	Regulated Entity No.
08/16/2024	O-2308	RN103012183

Unit ID No.	SOP/GOP Index No.	Construction Date	Tank Description	True Vapor Pressure	Primary Seal	Secondary Seal	Control Device Type	Control Device ID No.
GRP-PTKS	R5112-01		VRS1	1.5+A			VDU	800-B15.50
GRP-PTKS	R5112-02		VSR1	1.5+A			FLARE	900-FLARE

Storage Tank/Vessel Attributes Form OP-UA3 (Page 51) Federal Operating Permit Program Table 21a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63) Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing, Storage Vessels Texas Commission on Environmental Quality

 Date
 Permit No.
 Regulated Entity No.

 08/16/2024
 O-2308
 RN103012183

Unit ID No.	SOP Index No.	Emission Standard	Comb Device	95% Scrubber	PERF Test	Negative Pressure	Bypass Line
GRP-PTKS	634-GRPPTKS-01	76+FLR					
GRP-PTKS	634-GRPPTKS-02	76+CD95					

Storage Tank/Vessel Attributes Form OP-UA3 (Page 53) Federal Operating Permit Program Table 21c: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63) Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing, Storage Vessels Texas Commission on Environmental Quality

DatePermit No.Regulated Entity No.08/16/2024O-2308RN103012183

Unit ID No.	SOP Index No.	Designated HAL	Determined HAL	Prior Eval	Assessment Waiver	Negative Pressure	Bypass Line
GRP-PTKS	634-GRPPTKS-01	NO	NO	YES		NO	NONE

Storage Tank/Vessel Attributes Form OP-UA3 (Page 55) Federal Operating Permit Program Table 21e: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63) Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing, Storage Vessels Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
08/16/2024	O-2308	RN103012183

Unit ID No.	SOP Index No.	Alt 63SS Mon Parameters	CEMS	SS Device Type	Meets 63.988(b)(2)	Water	Designated HAL
GRP-PTKS	634-GRPPTKS-02	NO	YES	BPH44+	YES		NO

Attachment 4: OP-UA15 Tables 6 and 13

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

Date	Permit No.	Regulated Entity No.
08/16/2024	O-2308	RN103012183

Emission Point ID No.	SOP Index No.	Overlap	Group 1	Regulation	HAP Concentration	Flow Rate	Electing Control	NSPS TRE Index Value	MACT TRE Index Value	Plant Type
900-D78.01	63G-02	NNN	YES							

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

Date	Permit No.	Regulated Entity No.
08/16/2024	O-2308	RN103012183

Emission Point ID No.	SOP Index No.	Control Device	Control Device ID No.	Halogenated	TRE for Halogenated Vent Stream	Halogen Reduction Device	Installation Date	Performance Test
900-D78.01	63G-02	FLARE	900-FLARE	NO				NO

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

Date	Permit No.	Regulated Entity No.
08/16/2024	O-2308	RN103012183

Emission Point ID No.	SOP Index No.	Alternate Monitoring Parameters (AMP)	AMP ID No.	Continuous Monitoring	Continuous Monitoring Alt ID No.	Bypass Lines	Flow Indicator
900-D78.01	63G-02	NO		NOALT		NO	

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes Form OP-UA15 (Page 32) Federal Operating Permit Program Table 13a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63) Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing - Continuous Process Vents Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
08/16/2024	O-2308	RN103012183

Emission Point ID No.	SOP Index No.	Emission Standard	Comb Device	95% Scrubber	PERF Test	Negative Pressure	Bypass Line
900-D78.01	634-D78.01-01	CD98					
900-D78.01	634-D78.01-02	BLWFLR					

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes Form OP-UA15 (Page 35) Federal Operating Permit Program Table 13d: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63) Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing - Continuous Process Vents Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.		
08/16/2024	O-2308	RN103012183		

Emission Point ID No.	SOP Index No.	Designated GRP1	Designated HAL	Determined HAL	Prior Eval	Assessment Waiver	Assessment Waiver ID	Negative Pressure	Bypass Line
900-D78.01	634-D78.01- 02	YES	NO	NO	YES			NO	NONE

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes Form OP-UA15 (Page 36) Federal Operating Permit Program Table 13e: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63) Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing - Continuous Process Vents Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
08/16/2024	O-2308	RN103012183

Emission Point ID No.	SOP Index No.	Designated GRP1	Small Device	1257A1	1257A1 Device Type	1257A1 Device ID	Alt 63SS Mon Parameters	Alt 6388 Mon ID	CEMS	SS Device Type	SS Device ID
900-D78.01	634- D78.01-01	YES	NO				NO		NO	BHP44+	800-B15.50

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes Form OP-UA15 (Page 37) Federal Operating Permit Program Table 13f: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63) Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing - Continuous Process Vents Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
08/16/2024	O-2308	RN103012183

Emission Point ID No.	SOP Index No.	Meets 63.988(b)(2)	Water	Designated HAL	Determined HAL
900-D78.01	634-D78.01-01	YES		NO	NO

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes Form OP-UA15 (Page 38) Federal Operating Permit Program Table 13g: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63) Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing - Continuous Process Vents Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
08/16/2024	O-2308	RN103012183

Emission Point ID No.	SOP Index No.	HAL Device Type	HAL Device ID	Prior Eval	Assessment Waiver	Assessment Waiver ID	Formaldehyde	Negative Pressure	Bypass Line
900-D78.01	634-D78.01- 01	NONE		YES				NO	NONE

Attachment 5: OP-UA4 Table7

Loading/Unloading Operations Attributes Form OP-UA4 (Page 9) Federal Operating Permit Program Table 7a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63) Subpart G: National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Transfer Operations Texas Commission on Environmental Quality

Date	Permit No.:	Regulated Entity No.
08/16/2024	O-2308	RN103012183

Unit ID No.	SOP Index No.	Transfer Rack Type	Subject to Subpart BB	Compliance Options	Closed Vent System	Hard Piping
900-MEAC	63G-01	GRP1			SUBPTG	YES
900-MEAC	63G-02	GRP1			SUBPTG	YES
900-MEOH	63G-01	GRP1			SUBPTG	YES
900-MEOH	63G-02	GRP1			SUBPTG	YES

Loading/Unloading Operations Attributes Form OP-UA4 (Page 11) Federal Operating Permit Program Table 7c: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63) Subpart G: National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Transfer Operations Texas Commission on Environmental Quality

Da	Date		t No.:	Regulated	l Entity No.
08/16	5/2024	O-23	308	RN103	3012183
					1
Unit ID No.	SOP Index No.	Vapor Balancing System	Emissions Routing	Bypass Lines	Flow Indicator
900-MEAC	63G-01	NO	NO	NO	
900-MEAC	63G-02	NO	NO	NO	
900-MEOH	63G-01	NO	NO NO		
900-MEOH	63G-02	NO	NO	NO	

Loading/Unloading Operations Attributes Form OP-UA4 (Page 12) Federal Operating Permit Program Table 7d: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63) Subpart G: National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Transfer Operations Texas Commission on Environmental Quality

Date	Permit No.:	Regulated Entity No.
08/16/2024	O-2308	RN103012183

Unit ID No.	SOP Index No.	Halogenated Emissions	Combustion Device	Emission Rate	Installation Date	Scrubber	Scrubber ID No.
900-MEAC	63G-01	NO					
900-MEAC	63G-02	NO					
900-MEOH	63G-01	NO					
900-MEOH	63G-02	NO					

Loading/Unloading Operations Attributes Form OP-UA4 (Page 13) Federal Operating Permit Program Table 7e: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63) Subpart G: National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Transfer Operations Texas Commission on Environmental Quality

Date	Permit No.:	Regulated Entity No.
08/16/2024	O-2308	RN103012183

Unit ID No.	SOP Index No.	Control Device	Control Device ID No.	Title 40 CFR § 63.128(h) Option	Other Emissions	Enclosed Combustion Device	Thermal Incinerator
900-MEAC	63G-01	BPH	800-B15.50	NO			
900-MEAC	63G-02	FLARE	900-FLARE				
900-MEOH	63G-01	BPH	800-B15.50	NO			
900-MEOH	63G-02	FLARE	900-FLARE				

Loading/Unloading Operations Attributes Form OP-UA4 (Page 14) Federal Operating Permit Program Table 7f: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63) Subpart G: National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Transfer Operations Texas Commission on Environmental Quality

	Date			Permit No.:			Regulated Entity No.		
	08/16/2024			O-2	308		RN103012183		
Unit ID No.	SOP Index No.	Alternat Paramet Monitoring (er	APM ID No.	Performance Test Exemption		ed Control Device	Multiple Arms	Intermittent
900-MEAC	63G-01	NO			HIC44+				
900-MEOH	63G-01	NO			HIC44+				

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

VII. Technical Contact Identifying Information (Complete if different from RO.)
Technical Contact Name Prefix: (Mr. Mrs. Mrs. Ms. Dr.)
Technical Contact Full Name: Jenna Timtiman
Technical Contact Title: Environmental Engineer
Employer Name: Sekisui Specialty Chemicals America, LLC
Mailing Address: 1423 Pasadena Freeway (Highway 225)
City: Pasadena
State: Texas
ZIP Code: 77506
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 713-456-1555
Fax No.:
Email: Jenna.Timtiman@sekisui-sc.com
VIII. Reference Only Requirements (For reference only.)
A. State Senator: Carol Alvarado
B. State Representative: Mary Ann Perez
C. Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)?
D. Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? \Box YES \Box NO
E. Indicate the alternate language(s) in which public notice is required: Spanish

From:	eNotice TCEQ	
То:	carol.alvarado@senate.texas.gov; Jaime.Villarreal@senate.texas.gov; megan.maldonado@senate.texas.gov;	
	Maryann.perez@house.texas.gov	
Subject:	TCEQ Notice - Permit Number O2308	
Date:	Tuesday, June 18, 2024 3:59:33 PM	
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Jon Niermann, *Chairman* Bobby Janecka, *Commissioner* Catarina R. Gonzales, *Commissioner* Kelly Keel, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

June 18, 2024

THE HONORABLE CAROL ALVARADO TEXAS SENATE PO BOX 12068 AUSTIN TX 78711-2068

Re: Accepted Federal Operating Permit Renewal Application Project Number: 36728 Permit Number: O2308 Sekisui Specialty Chemicals America, LLC Pasadena Plant Pasadena, Harris County Regulated Entity Number: RN103012183 Customer Reference Number: CN603507849

Dear Senator Alvarado:

This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) renewal application for a site located in your district. As part of this permitting process, the applicant is required to publish a formal newspaper public notice. The notice will inform the public of their right to make comments or request a public hearing. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. https://gisweb.tceq.texas.gov/LocationMapper/?marker=-95.200277,29.731666&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.

P.O. Box 13087 • Austin, Texas 78711-3087 • 512-239-1000 • tceq.texas.gov

The Honorable Carol Alvarado Page 2 June 18, 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,

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 18, 2024

THE HONORABLE MARY ANN PEREZ TEXAS HOUSE OF REPRESENTATIVES PO BOX 2910 AUSTIN TX 78768-2910

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

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

Sincerely,

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

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House Member, 2009-2018; Senate Member: 2018 - present

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Profession: Insurance Agent Home Town: Houston Birthdate: 05-15-1962 Download vCard (/online/vcard/?id=56289&office=16813) (? (/online/aboutvcards/))



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B.B.A. Cum Laude-University of Houston-Downtown

H-2013-2015; 2017-present

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Dist. 144 - Harris (4%)

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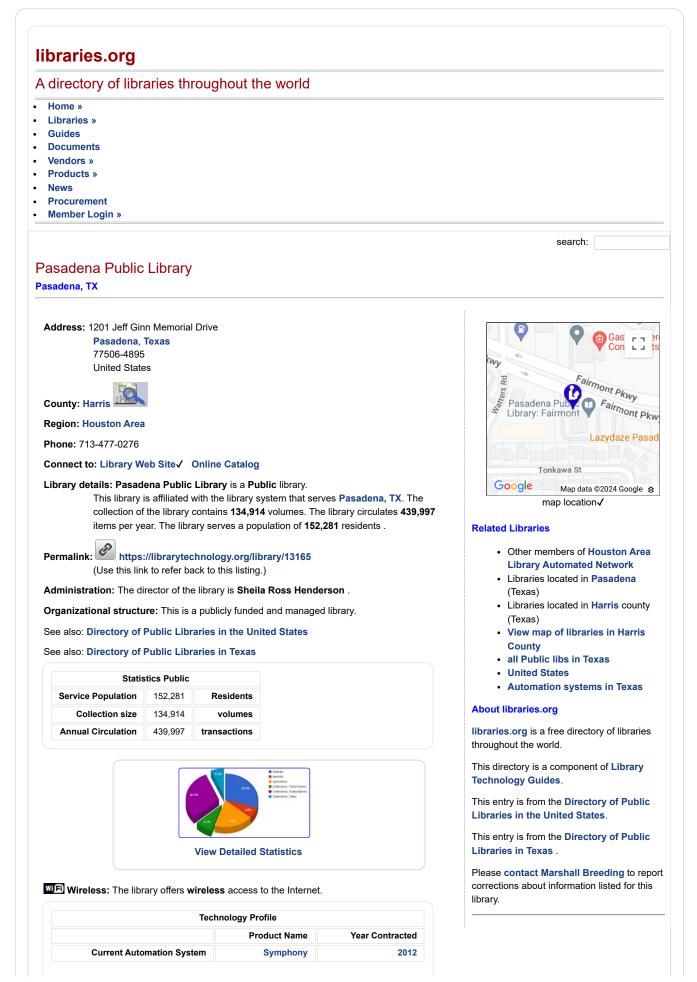
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TITLE V RENEWAL APPLICATION Sekisui Specialty Chemicals of America, LLC Pasadena Plant

TV Permit No. O-2308

Prepared By:

TRINITY CONSULTANTS

Trinity Consultants 1800 West Loop South Suite 1000 Houston, TX 77027 (713) 552-1371

June 2024



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1. EXECUTIVE SUMMARY

Sekisui Specialty Chemicals America, LCC (Sekisui) owns and operates a polyvinyl alcohol manufacturing plant in Pasadena, Harris County, TX (Pasadena Plant). Sekisui has been assigned Texas Commission on Environmental Quality (TCEQ) Customer Reference Number (CN) 603507849 and TCEQ Regulated Entity Reference Number (RN) 103012183. Sekisui operates the Pasadena Utilities Area that is authorized by Federal Operating Permit (FOP) O-2308 with the assigned TCEQ Air Quality Account Number HX-2763-T.

In accordance with 30 TAC §122.241(a), a permit renewal is required every five years. Per 30 TAC §122.133(2) a renewal application must be submitted six to 18 months before the permit's expiration date. The expiration date of TV O-2308 is December 11, 2024; therefore, a complete application must be submitted before June 11, 2024. Sekisui is submitting this application to comply with the requirements for renewal.

Sekisui is requesting the following Title V updates as part of the Renewal Application:

- Remove Unit ID P-62.01 (Firewater Pump).
- Incorporate OP-NOTIFY 21777.
- Update NSR Authorizations for three units.

The required supporting documentation for this revision is provided in this application and includes the following forms:

General Administration Forms:

- OP-1: Site Information Summary
- OP-2: Application for Permit Revision/Renewal
- OP-CRO1: Certification by Responsible Official
- OP-SUMR: Individual Unit Summary for Revisions
- OP-PBRSUP: Permits By Rule Supplemental Table

Unit Attribute Forms:

• OP-UA4: Loading/Unloading Operations Attributes

Applicability Determination Forms:

- OP-REQ1: Application Area-wide Applicability Determinations and General Information
- OP-REQ3: Applicable Requirements Summary

Compliance Certification Forms

• OP-ACPS: Application Compliance Plan and Schedule

2. GENERAL ADMINISTATION FORMS

OP-1: Site Information Summary OP-2: Application for Permit Revision/Renewal OP-CRO1: Certification by Responsible Official OP-SUMR: Individual Unit Summary for Revisions OP-PBRSUP: Permits By Rule Supplemental Table

2.1 **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: Sekisui Specialty Chemicals America, LLC
B.	Customer Reference Number (CN): CN603507849
C.	Submittal Date (<i>mm/dd/yyyy</i>): 06/11/2024
II.	Site Information
A.	Site Name: Pasadena Plant
B .	Regulated Entity Reference Number (RN): RN103012183
C.	Indicate affected state(s) required to review permit application: (Check the appropriate box[es].)
A	$R \square CO \square KS \square LA \square NM \square OK \square N/A$
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>
⊠v	$OC \qquad \boxtimes NO_X \qquad \square SO_2 \qquad \square PM_{10} \qquad \square CO \qquad \square Pb \qquad \boxtimes HAPS$
Other	r.
E.	Is the site a non-major source subject to the Federal Operating Permit Program?
F.	Is the site within a local program area jurisdiction?
G.	Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63?
H.	Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:
III.	Permit Type
A.	Type of Permit Requested: (Select only one response)
Si Si	ite Operating Permit (SOP) Temporary Operating Permit (TOP) General Operating Permit (GOP)

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

IV.	Initial Application Information (Complete for Initial Issuance Applications Only.)	
A.	Is this submittal an abbreviated or a full application?	Abbreviated Full
B.	If this is a full application, is the submittal a follow-up to an abbreviated application?	YES NO
C.	If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit?	UYES NO
D.	Has an electronic copy of this application been submitted (or is being submitted) to EPA (Refer to the form instructions for additional information.)	?
E.	Has the required Public Involvement Plan been included with this application?	YES NO
V.	Confidential Information	
A.	Is confidential information submitted in conjunction with this application?	YES 🕅 NO
VI.	Responsible Official (RO) Identifying Information	
RON	Name Prefix: (X Mr. Mrs. Ms. Dr.)	
RO F	Full Name: Jeffrey Thompson	
RO 1	Title: Site Leader	
Emp	loyer Name: Sekisui Specialty Chemicals America, LLC	
Mail	ing Address: 1423 Pasadena Freeway (Highway 225)	
City:	Pasadena	
State	: Texas	
ZIP (Code: 77506	
Terri	tory:	
Cour	ntry: USA	
Forei	gn Postal Code:	
Inter	nal Mail Code:	
Telep	bhone No.: 713-456-1507	
Fax 1	No.:	
Emai	l: <u>Jeffrey.Thompson@sekisui-sc.com</u>	

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

VII. Technical Contact Identifying Information (Complete if different from RO.)			
Technical Contact Name Prefix: (Mr. Mrs. Mrs. Ms. Dr.)			
Technical Contact Full Name: Jenna Timtiman			
Technical Contact Title: Environmental Engineer			
Employer Name: Sekisui Specialty Chemicals America, LLC			
Mailing Address: 1423 Pasadena Freeway (Highway 225)			
City: Pasadena			
State: Texas			
ZIP Code: 77506			
Territory:			
Country:			
Foreign Postal Code:			
Internal Mail Code:			
Telephone No.: 713-456-1554			
Fax No.:			
Email: <u>Jenna.Timtiman@sekisui-sc.com</u>			
VIII. Reference Only Requirements (For reference only.)			
A. State Senator: Carol Alvarado			
B. State Representative: Mary Ann Perez			
C. Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)?			
D. Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? \Box YES \Box NO			
E. Indicate the alternate language(s) in which public notice is required: Spanish			

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

IX.	Off-Site Permit Request (Optional for applicants requesting to hold the FOP and records at an off-site location.)
A.	Office/Facility Name:
B.	Physical Address:
City:	
State:	
ZIP C	Code:
Territ	ory:
Count	try:
Foreig	gn Postal Code:
C.	Physical Location:
D.	Contact Name Prefix: (Mr. Mrs. Ms. Dr.)
Conta	act Full Name:
E.	Telephone No.:
Х.	Application Area Information
A.	Area Name: Pasadena Plant
B.	Physical Address: 1423 Pasadena Freeway (Highway 225)
City:	Pasadena
State:	Texas
ZIP C	Code: 77506
C.	Physical Location:
D.	Nearest City: Pasadena
E.	State: Texas
F.	ZIP Code: 77506

TCEQ 10002 (APD ID 251v1, revised 09/23) OP-1 This form is for use by sources subject to air quality permit requirements and may be revised periodically.

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

X.	Application Area Information <i>(continued)</i>		
G.	Latitude (nearest second): 029:42:54		
H.	Longitude (nearest second): 095:12:01		
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?		
J.	Indicate the estimated number of emission units in the application area: 65		
K.	Are there any emission units in the application area subject to the Acid Rain Program?		
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: Pasadena Public Library		
B.	Physical Address: 1201 Jeff Ginn Memorial Drive		
City:	Pasadena		
ZIP C	Code: 77506		
C.	Contact Person (Someone who will answer questions from the public during the public notice period):		
Conta	act Name Prefix: (Mr. Mrs. Ms. Dr.):		
Conta	act Person Full Name: Jenna Timtiman		
Conta	act Mailing Address: 1423 Pasadena Freeway (Highway 225)		
City:	Pasadena		
States	Texas		
ZIP C	Code: 77506		
Territ	tory:		
Coun	try: USA		
Forei	gn Postal Code:		
Intern	Internal Mail Code:		
Telep	hone No.: (713) 456-1555		

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:						

2.2 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: 06/11/2024	
Permit No.: O-2308	
Regulated Entity No.: RN103012183	
Company Name: Sekisui Specialty Chemicals America Pasadena Plant	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA?	🛛 YES 🗌 NO
I. Application Type	
Indicate the type of application:	
🖂 Renewal	
Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
Significant Revision	
Revision Requesting Prior Approval	
Administrative Revision	
Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only	🛛 YES 🗌 NO
For GOP Revisions Only	YES NO

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

III.	Major Source Pollutant	s (Complete this section if the	e permit revision is due t	o a change at the site o	or change in regulations.)	I		
Indicate all pollutants for which the site is a major source based on the site's potential to emit: (Check the appropriate box[es].)								
⊠ V0	DC \square NO _X	\Box SO ₂	$\square PM_{10}$	CO	DPb	🖂 HAP		
Other								
IV.	Reference Only Require	ements (For reference only)						
Has tl	Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)?							
V. Delinquent Fees and Penalties								
	Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.							

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

Date: 06/11/2024	
Permit No.: O-2308	
Regulated Entity No.: RN103012183	
Company Name: Sekisui Specialty Chemicals America Pasadena Plant	

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

			Unit/Group	Process		
Revision No.	Revision Code	New Unit	ID No.	Applicable Form	NSR Authorization	Description of Change and Provisional Terms and Conditions
1	MS-C	No	P-62.01	OP-REQ3	106.511	Remove unit from permit as it is no longer in service.
2	MS-C	Yes	900-VAT	OP-UA4	106.473	Per OP-NOTIFY 21777, add unit to permit with applicability to 30 TAC Chapter 115 and 40 CFR Part 63 Subpart G.
3	MS-A	No	900-FLARE	OP-SUMR	19618 106.261 106.262	Add NSR Authorization 106.261 (PBR 140143) to list of NSR authorizations.
4	MS-A	No	900-HFUG	OP-SUMR	19618 106.261 106.262 106.263	Add NSR Authorization 106.261 (PBR 146138) to list of NSR authorizations.
5	MS-A	No	900-PFUG	OP-SUMR	19618 106.261 106.262 106.263	Add NSR Authorization 106.261 (PBR 169051) to list of NSR authorizations.

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

Date: 06/11/2024 Permit No.: O-2308 Regulated Entity No.: RN103012183 Company Name: Sekisui Specialty Chemicals America Pasadena Plant

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

			Unit/Group	Process		
Revision No.	Revision Code	New Unit	ID No.	Applicable Form	NSR Authorization	Description of Change and Provisional Terms and Conditions
6	MS-A	No	900-MEAC	OP-SUMR	19618	Update NSR Authorization to NSR 19618.

2.3 **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: RN103012183	CN: CN603507	7849	1	Account No.: H	Х-2763-Т
Permit No.: O-2308		Project No.:			
Area Name: Pasadena Plant		Company Nan	ne: Sekisui	Specialty Cher	micals America, LLC
II. Certification Type (Please mark	the appropriate	box)			
Responsible Official		Duly A	uthorized R	lepresentative	
III. Submittal Type (Please mark the	appropriate bo	x) (Only one re	esponse can	be accepted per	r form)
SOP/TOP Initial Permit Application	🗌 Upda	te to Permit Ap	pplication		
GOP Initial Permit Application	🛛 Perm	it Revision, Re	enewal, or R	Reopening	
Other:					
IV. Certification of Truth					
This certification does not extend to in only.	nformation whi	ch is designate	ed by the T	CEQ as inform	ation for reference
I, Jeffrey Thom	oson	certif	fy that I am	the	RO
I, <u>Jeffrey Thom</u> (Certifier Name printed or	typed)			(RC) or DAR)
and that, based on information and belie the time period or on the specific date(s)				ements and infor	mation dated during
Note: Enter Either a Time Period OR S certification is not valid without docume		or each certific	cation. This	section must be	completed. The
Time Period: From		to			
St	art Date			End Date	
Specific Dates:					
Date 1	Date 2	Date 3	Date 4	Date	5 Date 6
Signature:			Signatur	e Date:	
Title: Site Leader					

2.4 OP-SUMR: Individual Unit Summary for Revisions

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

Date	Permit No.	Regulated Entity No.
06/11/2024	O-2308	RN103012183

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
D	1	P-62.01	OP-REQ3	Firewater Pump		106.511/09/04/2000	
A	2	900-VAT	OP-UA4	Sludge Still Vat		106.473/09/04/2000	
	3	900-FLARE	OP-SUMR	FS-78.01 PVOH Backup Flare		19618 106.261/11/01/2003[140143] 106.262/11/01/2003[140143]	
	4	900-HFUG	OP-SUMR	HON Fugitives		19618 106.261/11/01/2003[146138] 106.262/11/01/2003[146138] 106.263/11/01/2001	
	5	900-PFUG	OP-SUMR	Non-HON Fugitives		19618 106.261/11/01/2003[147154] 106.262/11/01/2003[169051] 106.263/11/01/2001	
	6	900-MEAC	OP-SUMR	Methyl Acetate Loading/Unloading		<mark>19618</mark>	

2.5 **OP-PBRSUP: Permits By Rule Supplemental Table**

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
6/11/2024	O-2308	RN103012183

Unit ID No.	Registration No.	PBR No.	Registration Date
900-10.30	109025	106.478	04/10/2014
900-FLARE	140143	106.261 & 106.262	06/06/2016
900-HFUG	146138	106.261 & 106.262	04/28/2017
900-PFUG	147154	106.261	06/29/2017
STK1, STK2, STK3, STK4, STK5	151689	106.261 & 106.262	05/11/2018
900-PFUG	169051	106.262	05/18/2022

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
6/11/2024	O-2308	RN103012183
Unit ID No.	PBR No.	Version No./Date
REGVLOAD, 900-HFUG, 900-PFUG	106.263	11/01/2001
900-PFUG	106.373	09/04/2000
900-PFUG	106.452	09/04/2000
900-PFUG	106.454	11/01/2001
ТК-72.03, ТК-72.07	106.472	09/04/2000
900-VAT	106.473	09/04/2000
EG1	106.511	09/04/2000

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

Date	Permit Number	Regulated Entity Number		
6/11/2024	O-2308	RN103012183		

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement					
900-FLARE	106.261 & 106.262	140143	Duration of when backup flare is in operation is tracked and docurmented.					
900-HFUG	106.261 & 106.262	146138	28 VHP.					
900-PFUG	106.261	147154	28 VHP.					
900-PFUG	106.262	169051	28 VHP.					
REGVLOAD, 900-HFUG, 900-PFUG	106.263	11/01/2001	Date, time, and duration of event is documented.					
900-PFUG	106.373	09/04/2000	Type of refrigerant is documented.					
900-PFUG	106.454	11/01/2001	Total solvent makeup is documented.					
TK-72.03, TK-72.07	106.472	09/04/2000	Loading activity is documented.					
900-VAT	106.473	09/04/2000	Loading activity is documented.					
900-10.30	106.478	04/10/2014	Tank throughput and composition is documented.					
EG1	106.511	09/04/2000	Run time meters records to document hours in use.					
STK1, STK2, STK3, STK4, STK5	151689	05/11/2018	Each operational event is documented.					

3. UNIT ATTRIBUTE FORMS

3.1 OP-UA4: Loading/Unloading Operations Attributes

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

Date				Permit No.:			Regulated Entity No.			
06/11/2024				O-2308			RN103012183			
Unit ID No.	SOP/GOP Index No.	Chapter 115 Facility Type	Alternate Control Requirement (ACR)	ACR ID No.	Product Transferred	Transfer 7	Гуре	True Vapor Pressure	Daily Through-put	Control Options
900-VAT	R5212-03	OTHER	NONE		VOC1	BOTH		0.5 +	NCE2	BAL

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

Date	Permit No.:	Regulated Entity No.		
06/11/2024	O-2308	RN103012183		

Unit ID No.	SOP Index No.	Chapter 115 Control Device Type	Chapter 115 Control Device ID No.	Vapor-Tight	Vapor Space Holding Tank	Marine Terminal Exemptions	VOC Flash Point	Uncontrolled VOC Emissions
900-VAT	R5212-03	NONE		NO				

Loading/Unloading Operations Attributes Form OP-UA4 (Page 9) Federal Operating Permit Program Table 7a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63) Subpart G: National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Transfer Operations Texas Commission on Environmental Quality

Date	Permit No.:	Regulated Entity No.
06/11/2024	O-2308	RN103012183

Unit ID No.	SOP Index No.	Transfer Rack Type	Subject to Subpart BB	Compliance Options	Closed Vent System	Hard Piping
900-VAT	63G-03	GRP2	NO			

4. APPLICABILITY IDENTIFICATION FORMS

OP-REQ1: Application Area-wide Applicability Determinations and General Information

OP-REQ3: Applicable Requirements Summary

4.1 **OP-REQ1: Application Area-wide Applicability Determinations and** General Information

Date:	06/11/2024
Permit No.:	O-2308
RN No.:	RN103012183

For SOP applications, answer ALL questions unless otherwise directed.

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

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For SOP applications, answer ALL questions unless otherwise directed.

For	m OP-	REQI	l: Pag	e 2		
I.		e 30 T Itinue		hapter 111 - Control of Air Pollution from Visible Emissions and Particu	late Matt	er
	B.	Mat	terials	Handling, Construction, Roads, Streets, Alleys, and Parking Lots		
		1.	Item	s a - d determines applicability of any of these requirements based on geogra	phical loc	ation.
٠			a.	The application area is located within the City of El Paso.	YES	NO
•			b.	The application area is located within the Fort Bliss Military Reservation, except areas specified in 30 TAC § 111.141.	YES	NO
•			c.	The application area is located in the portion of Harris County inside the loop formed by Beltway 8.	YES	NO
•			d.	The application area is located in the area of Nueces County outlined in Group II state implementation plan (SIP) for inhalable particulate matter adopted by the TCEQ on May 13, 1988.	YES	NO
				ere is any "YES" response to Questions I.B.1.a - d, answers Questions I.B.2.d uestions I.B.1.a-d are "NO," go to Section I.C.	a - d. If al	l responses
		2.	Item	as a - d determine the specific applicability of these requirements.		
٠			a.	The application area is subject to 30 TAC § 111.143.	YES	NO
٠			b.	The application area is subject to 30 TAC § 111.145.	YES	NO
٠			c.	The application area is subject to 30 TAC § 111.147.	YES	NO
٠			d.	The application area is subject to 30 TAC § 111.149.	YES	NO
	C.	Emi	issions	Limits on Nonagricultural Processes	1	
•		1.		application area includes a nonagricultural process subject to 30 TAC 1.151.	YES	NO
		2.	subje	application area includes a vent from a nonagricultural process that is ect to additional monitoring requirements. <i>e response to Question I.C.2 is "NO," go to Question I.C.4.</i>	YES	NO
		3.		vents from nonagricultural process in the application area are subject to tional monitoring requirements.	YES	NO

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

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

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For SOP applications, answer ALL questions unless otherwise directed.

•	For GOP applications,	answer ONLY thes	e questions unless	otherwise directed.
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Form	Form OP-REQ1: Page 5				
III.	I. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)				
	C.	Indu	strial 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>	YES	□NO □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</i> <i>Beaumont/Port Arthur area, go to Section III.D.</i>	YES	⊠NO
		3.	The application area is complying with the provisions of 40 CFR Part 63, Subpart G, as an alternative to complying with this division (relating to Industrial Wastewater). If the response to Question III.C.3 is "YES," go to Section III.D.	YES	NO
		4.	The application area is located at a plant with an annual VOC loading in wastewater, as determined in accordance with 30 TAC § 115.148, less than or equal to 10 Mg (11.03 tons). If the response to Question III.C.4 is "YES," go to Section III.D.	⊠YES	NO
		5.	The application area includes wastewater drains, junction boxes, lift stations, or weirs that are subject to the control requirements of 30 TAC § 115.142(1).	YES	NO
		6.	The application area includes wastewater drains, junction boxes, lift stations, or weirs that handle streams chosen for exemption under 30 TAC § 115.147(2).	YES	NO
		7.	The application area includes wastewater drains, junction boxes, lift stations, or weirs that have an executive director approved exemption under 30 TAC § 115.147(4).	YES	□NO
	D.	Load	ling and Unloading of VOCs		
•		1.	The application area includes VOC loading operations.	YES	NO
•		2.	The application area includes VOC transport vessel unloading operations. For GOP applications, if the responses to Questions III.D.1 - D.2 are "NO," go to Section III.E.	⊠YES	□NO

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

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

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Form	n OP-	REQ1	: Page 8		
III.	Title	e 30 T.	AC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds	(continue	ed)
	F.		trol of VOC Leaks from Transport Vessels (Complete this section for GOP app 512, 513 and 514 only) (continued)	plications	for GOPs
•		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 \text{ TAC } $ 115.214(a)(1)(C) within the application area.	□ YES	□NO □N/A
•		3.	Tank-truck tanks are filled with, or emptied of, gasoline at a facility that is subject to 30 TAC § $115.214(b)(1)(C)$ or $115.224(2)$ within the application area.	YES	□NO □N/A
	G.	Con	trol of Vehicle Refueling Emissions (Stage II) at Motor Vehicle Fuel Dispensing	g Faciliti	es
•		1.	The application area includes one or more motor vehicle fuel dispensing facilities and gasoline is transferred from a stationary storage container into motor vehicle fuel tanks. If the response to Question III.G.1 is "NO" or "N/A," go to Section III.H.	YES	⊠NO □N/A
•		2.	The application area includes facilities that began construction on or after November 15, 1992 and prior to May 16, 2012.	YES	NO
•		3.	The application area includes facilities that began construction prior to November 15, 1992. <i>If the responses to Questions III.G.2 and Question III.G.3 are both "NO," go to</i> <i>Section III.H.</i>	□ YES	NO
•		4.	The application area includes only facilities that have a monthly throughput of less than 10,000 gallons of gasoline.	YES	NO
•		5.	The decommissioning of all Stage II vapor recovery control equipment located in the application area has been completed and the decommissioning notice submitted.	YES	□NO □N/A

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

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

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

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

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

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

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

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

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Form	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			ound	
	А.	A. Subpart B - National Volatile Organic Compound Emission Standards for Automobi Coatings			ìish
		1.	The application area manufactures automobile refinish coatings or coating components and sells or distributes these coatings or coating components in the United States.	YES	⊠NO
		2.	The application area imports automobile refinish coatings or coating components, manufactured on or after January 11, 1999, and sells or distributes these coatings or coating components in the United States. <i>If the responses to Questions V.A.1 and V.A.2 are both "NO," go to Section V.B.</i>	YES	NO
		3.	All automobile refinish coatings or coating components manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR § $59.100(c)(1) - (6)$.	YES	□NO
	B. Subpart C - National Volatile Organic Compound Emission Standards for Consumer Products			cts	
		1.	The application area manufactures consumer products for sale or distribution in the United States.	YES	NO
		2.	The application area imports consumer products manufactured on or after December 10, 1998 and sells or distributes these consumer products in the United States.	YES	⊠NO
		3.	The application area is a distributor of consumer products whose name appears on the label of one or more of the products. <i>If the responses to Questions V.B.1 - V.B.3 are all "NO," go to Section V.C.</i>	YES	⊠NO
		4.	All consumer products manufactured, imported, or distributed by the application area meet one or more of the exemptions specified in 40 CFR § $59.201(c)(1) - (7)$.	YES	□NO

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

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Form	Form OP-REQ1: Page 18				
VI.	Title	40 Co	ode of Federal Regulations Part 60 - New Source Performance Standards (cont	tinued)	
	B.	Subpart Y - Standards of Performance for Coal Preparation and Processing Plants			
		1.	The application area is located at a coal preparation and processing plant. If the response to Question VI.B.1 is "NO," go to Section VI.C.	YES	NO
		2.	The coal preparation and processing plant has a design capacity greater than 200 tons per day (tpd). If the response to Question VI.B.2 is "NO," go to Section VI.C.	YES	NO
		3.	The plant has an option to enforceably limit its operating level to less than 200 tpd and is choosing this option. If the response to Question VI.B.3 is "YES," go to Section VI.C.	YES	NO
		4.	The plant contains an open storage pile, as defined in § 60.251, as an affected facility. If the response to Question VI.B.4 is "NO," go to Section VI.C.	YES	NO
		5.	The open storage pile was constructed, reconstructed or modified after May 27, 2009.	YES	NO
	C.	. Subpart GG - Standards of Performance for Stationary Gas Turbines (GOP applicants only)			r)
•		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>	YES	□NO □N/A
•		2.	One or more of the affected facilities were constructed, modified, or reconstructed after October 3, 1977 and prior to February 19, 2005. <i>If the response to Question VI.C.2 is "NO," go to Section VI.D.</i>	YES	NO
•		3.	One or more stationary gas turbines in the application area are using a previously approved alternative fuel monitoring schedule as specified in 40 CFR § 60.334(h)(4).	YES	NO
•		4.	The exemption specified in 40 CFR § 60.332(e) is being utilized for one or more stationary gas turbines in the application area.	YES	□NO

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Form	Form OP-REQ1: Page 19				
VI.	Title	40 Co	ode of Federal Regulations Part 60 - New Source Performance Standards (cont	inued)	
	C.	-	oart GG - Standards of Performance for Stationary Gas Turbines (GOP applic tinued)	cants only	7)
•		5.	One or more stationary gas turbines subject to 40 CFR Part 60, Subpart GG in the application area is injected with water or steam for the control of nitrogen oxides.	YES	□NO
	D.	Subp	oart XX - Standards of Performance for Bulk Gasoline Terminals		
		1.	The application area includes bulk gasoline terminal loading racks. If the response to Question VI.D.1 is "NO," go to Section VI.E.	YES	⊠NO □N/A
		2.	One or more of the loading racks were constructed or modified after December 17, 1980, and are not subject to 40 CFR Part 63, Subpart CC.	YES	NO
	Е.		oart LLL - Standards of Performance for Onshore Natural Gas Processing: Su ssions	lfur Diox	tide (SO ₂)
•		1.	The application area includes affected facilities identified in 40 CFR § 60.640(a) that process natural gas (onshore). For SOP applications, if the response to Question VI.E.1 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.1 is "NO" or "N/A," go to Section VI.H.	□ YES	⊠NO
•		2.	The affected facilities commenced construction or modification after January 20, 1984 and on or before August 23, 2011. For SOP applications, if the response to Question VI.E.2 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.2 is "NO," go to Section VI.H.	YES	NO
•		3.	The application area includes a gas sweetening unit with a design capacity greater than or equal to 2 long tons per day (LTPD) of hydrogen sulfide but operates at less than 2 LTPD. For SOP applications, if the response to Question VI.E.3 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.3 is "NO," go to Section VI.H.	YES	NO

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

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

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

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Form	Form OP-REQ1: Page 23					
VI.	I. 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 Incid Units for Which Construction Commenced After November 30, 1999 or for Which Modificat Reconstruction Commenced on or After June 1, 2001 (continued)					
•		3.	The application area includes at least one commercial or industrial solid waste incineration unit, other than an air curtain incinerator, constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001.	YES	□NO	
•		4.	The application area includes at least one air curtain incinerator. If the response to Question VI.I.4 is "NO," go to Section VI.J.	YES	NO	
•		5.	The application area includes at least one air curtain incinerator, constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001. <i>If the response to Question VI.I.5 is "NO," go to VI.I.7.</i>	YES	□NO	
•		6.	All air curtain incinerators constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	YES	NO	
•		7.	The application area includes at least one air curtain incinerator, constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001.	YES	□NO	
•		8.	All air curtain incinerators constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	YES	□NO	

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

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Form	Form OP-REQ1: Page 25					
VI.	Title	40 C	ode of Federal Regulations Part 60 - New Source Performance Standards (NSP	'S) (conti	nued)	
	J.	Con	part EEEE - Standards of Performance for Other Solid Waste Incineration Un struction Commenced After December 9, 2004 or for Which Modification or R umenced on or After June 16, 2006 (continued)			
•		8.	All air curtain incinerators constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	YES	NO	
•		9.	The air curtain incinerator is located at an institutional facility and is a distinct operating unit of the institutional facility that generated the waste.	YES	NO	
♦		10.	The air curtain incinerator burns less than 35 tons per day of wood waste, clean lumber, or yard waste or a mixture of these materials.	YES	□NO	
	K.	Subpart OOOO - Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution				
•		1.	The application area includes one or more of the onshore affected facilities listed in 40 CFR § 60.5365(a)-(g) that are subject to 40 CFR Part 60, Subpart OOOO.	YES	NO	
VII.	Title	e 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants				
	A.	Applicability				
♦		1.	The application area includes a unit(s) that is subject to one or more 40 CFR Part 61 subparts. If the response to Question VII.A.1 is "NO" or "N/A," go to Section VIII.	YES	⊠NO □N/A	
	B.	Subj	part F - National Emission Standard for Vinyl Chloride			
		1.	The application area is located at a plant which produces ethylene dichloride by reaction of oxygen and hydrogen chloride with ethylene, vinyl chloride by any process, and/or one or more polymers containing any fraction of polymerized vinyl chloride.	YES	NO	
	C.		part J - National Emission Standard for Benzene Emissions for Equipment Lea ssion Sources) of Benzene (Complete this section for GOP applications only)	ıks (Fugit	ive	
•		1.	The application area includes equipment in benzene service.	YES	□NO □N/A	

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Form	Form OP-REQ1: Page 26					
VII.	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-Prod Plants			overy	
		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>	YES	NO	
		2.	The application area includes equipment in benzene service as determined by 40 CFR § 61.137(b).	YES	NO	
		3.	The application area has elected to comply with the provisions of 40 CFR § 61.243-1 and 40 CFR § 61.243-2.	YES	NO	
	E. Subpart M - National Emission Standard for Asbestos					
	Applicability					
		1.	The application area includes sources, operations, or activities specified in 40 CFR §§ 61.143, 61.144, 61.146, 61.147, 61.148, or 61.155. <i>If the response to Question VII.E.1 is "NO," go to Section VII.F.</i>	YES	NO	
Roadway Construction			•			
		2.	The application area includes roadways constructed or maintained with asbestos tailings or asbestos-containing waste material.	YES	NO	
		Man	ufacturing Commercial Asbestos			
		3.	The application area includes a manufacturing operation using commercial asbestos.	YES	NO	
			If the response to Question VII.E.3 is "NO," go to Question VII.E.4.			
			a. Visible emissions are discharged to outside air from the manufacturing operation	YES	<u>NO</u>	
			b. An alternative emission control and waste treatment method is being used that has received prior U.S. Environmental Protection Agency (EPA) approval.	YES	□NO	

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

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

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Form	Form OP-REQ1: Page 29						
VII.		le 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants ntinued)					
	E.	Subpart M - National Emission Standard for Asbestos (continued)					
		Fabr	bricating Commercial Asbestos (continued)				
			f. A HEPA filter is being used that is certified to be at least 99.97% efficient YES for 0.3 micron particles.	S 🗌 NO			
			g. The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.	S 🗌 NO			
		Non-	n-sprayed Asbestos Insulation				
		6.	The application area includes insulating materials (other than spray applied insulating materials) that are either molded and friable or wet-applied and friable after drying.	S 🗌 NO			
		Asbestos Conversion					
		7.	The application area includes operations that convert regulated asbestos- containing material and asbestos-containing waste material into nonasbestos (asbestos-free) material.	S 🗌 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.	S 🗌 NO			
	G.	Subpart BB - National Emission Standard for Benzene Emissions from Benzene Transfer Operations					
		1.	The application area is located at a benzene production facility and/or bulk terminal. If the response to Question VII.G.1 is "NO," go to Section VII.H.	S 🗌 NO			
		2.	The application area includes benzene transfer operations at marine vessel loading racks.	S 🗌 NO			

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Form	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 Trans (continued)					
		3.	The application area includes benzene transfer operations at railcar loading racks.	YES NO			
		4.	The application area includes benzene transfer operations at tank-truck loading racks.	YES NO			
	H.	part FF - National Emission Standard for Benzene Waste Operations					
		Appl	licability				
		1.	The application area includes a chemical manufacturing plant, coke by-product recovery plant, or petroleum refinery facility as defined in § 61.341.	□YES □NO			
		2.	The application area is located at a hazardous waste treatment, storage, and disposal (TSD) facility site as described in 40 CFR § 61.340(b). <i>If the responses to Questions VII.H.1 and VII.H.2 are both "NO," go to Section VIII.</i>	□YES □NO			
		3.	The application area is located at a site that has no benzene onsite in wastes, products, byproducts, or intermediates. If the response to Question VII.H.3 is "YES," go to Section VIII.	□YES □NO			
		4.	The application area is located at a site having a total annual benzene quantity from facility waste less than 1 megagram per year (Mg/yr). <i>If the response to Question VII.H.4 is "YES," go to Section VIII</i>	□YES □NO			
		5.	The application area is located at a site having a total annual benzene quantity from facility waste greater than or equal to 1 Mg/yr but less than 10 Mg/yr. <i>If the response to Question VII.H.5 is "YES," go to Section VIII.</i>	UYES NO			

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

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

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Form	ı OP-I	<i>EQ1</i> :	: Page 33			
VII.		le 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants ntinued)				
	H.	Subr	part FF - National Emission Standard for Benzene Waste Operations (continue	ed)		
		Indiv	vidual Drain Systems (continued)			
		22.	The application area has individual drain systems complying with 40 CFR § 61.346(b).	YES	NO	
			If the response to Question VII.H.22 is "NO," go to Question VII.H.25.			
		23.	Junction boxes in the individual drain systems are equipped with a system to prevent the flow of organic vapors from the junction box vent pipe to the atmosphere during normal operation.	YES	NO	
		24.	Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device.	YES	□NO	
	Remediation Activities					
		25.	Remediation activities take place at the application area subject to 40 CFR Part 61, Subpart FF.	YES	NO	
VIII.			ode of Federal Regulations Part 63 - National Emission Standards for Hazardo e Categories	us Air Po	ollutants	
	A.	Appl	licability			
•		1.	The application area includes a unit(s) that is subject to one or more 40 CFR Part 63 subparts other than subparts made applicable by reference under subparts in 40 CFR Part 60, 61 or 63. See instructions for 40 CFR Part 63 subparts made applicable only by reference.	YES	NO	
	В.	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>	YES	□NO	

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Form OP-1	Form OP-REQ1: Page 34				
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)				
В.	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>	⊠YES	NO	
	3.	The application area is located at a site that includes at least one chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii) and uses as a reactant or manufactures as a product, or co-product, one or more of the organic hazardous air pollutants listed in table 2 of 40 CFR Part 63, Subpart F.	YES	⊠NO	
	4.	The application area includes a chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii) and uses as a reactant or manufactures as a product, or co-product, one or more of the organic hazardous air pollutants listed in table 2 of 40 CFR Part 63, Subpart F.	YES	⊠NO	
	5.	The application area includes a chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii) and does <u>not</u> use as a reactant or manufacture as a product, or co-product, one or more of the organic hazardous air pollutants listed in table 2 of 40 CFR Part 63, Subpart F. <i>If the response to Questions VIII.B.3, B.4 and B.5 are all "NO," go to</i> <i>Section VIII.D.</i>	⊠YES	□NO	

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

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Form OP-	Form OP-REQ1: Page 36				
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)				
C.	Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)				
	Relo	ading or Cleaning of Railcars, Tank Trucks, or Barges			
	8.	The application area includes reloading and/or cleaning of railcars, tank trucks, or barges that deliver HAPs to a storage tank. If the response to Question VIII.C.8 is "NO," go to Question VIII.C.11.	YES	NO	
	9.	The application area includes operations that are complying with § $63.119(g)(6)$ through the use of a closed-vent system with a control device used to reduce inlet emissions of HAPs by at least 95 percent by weight or greater.	YES	□NO	
	10.	The application area includes operations that are complying with $ (5.119)(g)(6) $ through the use of a vapor balancing system.	YES	□NO	
	Tran	nsfer Racks			
	11.	The application area includes Group 1 transfer racks that load organic HAPs.	YES	NO	
	Proc	ess Wastewater Streams			
	12.	The application area includes process wastewater streams. If the response to Question VIII.C.12 is "NO," go to Question VIII.C.34.	YES	□NO	
	13.	The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Part 61, Subpart FF. <i>If the response to Question VIII.C.13 is "NO," go to Question VIII.C.15.</i>	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. <i>If the response to Question VIII.C.15 is "NO," go to Question VIII.C.17.</i>	YES	⊠NO	

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Form O	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.	C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)				
	Proc	ess Wastewater Streams (continued)			
	16.	The application area includes process wastewater streams utilizing the compliance option specified in 40 CFR § $63.110(f)(4)(ii)$.	YES	□NO	
	17.	The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Parts 260 through 272. <i>If the response to Question VIII.C.17 is "NO," go to Question VIII.C.20.</i>	YES	⊠NO	
	18.	The application area includes process wastewater streams complying with $40 \text{ CFR } \S 63.110(e)(2)(i).$	YES	NO	
	19.	The application are includes process wastewater streams complying with $40 \text{ CFR } \S 63.110(e)(2)(ii).$	YES	NO	
	20.	The application area includes process wastewater streams, located at existing sources, that are designated as Group 1; are required to be treated as Group 1 under 40 CFR § 63.110; or are determined to be Group 1 for Table 9 compounds.	YES	NO	
	21.	The application area includes process wastewater streams, located at existing sources that are Group 2.	YES	□NO	
	22.	The application area includes process wastewater streams, located at new sources, that are designated as Group 1; required to be treated as Group 1 under 40 CFR § 63.110; or are determined to be Group 1 for Table 8 or Table 9 compounds.	YES	NO	
	23.	The application area includes process wastewater streams, located at new sources that are Group 2 for both Table 8 and Table 9 compounds.	YES	NO	

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

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

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Form OP	orm OP-REQ1: Page 40				
	I. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)				
C.	Org	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)			
	Dra	ins (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(1)(1) or (1)(2); and the equipment conveys water with a total annual average concentration greater than or equal to 10 parts per million by weight of compounds listed in 40 CFR Part 63 Subpart G, Table 8, at an average annual flow rate greater than or equal to 0.02 liter per minute.	∐YES	□NO	
	Gas	Streams			
	39.	The application area includes gas streams meeting the characteristics of 40 CFR § 63.107(b) - (h) or the criteria of 40 CFR § 63.113(i) and are transferred to a control device not owned or operated by the applicant.	YES	NO	
	40.	The applicant is unable to comply with 40 CFR 63.113 - 63.118 for one or more reasons described in 40 CFR § 63.100(q)(1), (3), or (5).	YES	NO	
D.	Subpart N - National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks				
	1.	The application area includes chromium electroplating or chromium anodizing tanks located at hard chromium electroplating, decorative chromium electroplating, and/or chromium anodizing operations.	YES	NO	

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

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Form OP-	REQ1	: Page 42	Form OP-REQ1: Page 42				
		Code of Federal Regulations Part 63 - National Emission Standards for Hazardo e Categories (continued)	ous Air Po	ollutants			
G.	Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk C Terminals and Pipeline Breakout Stations) (continued)			e			
	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.	YES	NO			
		If the response to Question VIII.G.4 is "YES," go to Question VIII.G.10.					
	5.	An emissions screening factor was calculated for the bulk gasoline terminal or pipeline breakout station. If the response to Question VIII.G.5 is "NO," go to Question VIII.G.10.	YES	□NO			
			<u> </u>				
	6.	The value 0.04(OE) is less than 5% of the value of the bulk gasoline terminal emissions screening factor (ET) or the pipeline breakout station emissions screening factor (Ep). If the response to Question VIII.G.6 is "NO," go to Question VIII.G.10.	YES	NO			
	7.	Emissions screening factor less than 0.5 (ET or EP < 0.5). If the response to Question VIII.G.7 is "YES," go to Section VIII.H.	YES	□NO			
	8.	Emissions screening factor greater than or equal to 0.5, but less than 1.0 ($0.5 \le$ ET or EP < 1.0).	YES	NO			
		If the response to Question VIII.G.8 is "YES," go to Section VIII.H.	<u> </u>				
	9.	Emissions screening factor greater than or equal to 1.0 (ET or EP \geq 1.0). If the response to Question VIII.G.9 is "YES," go to Question VIII.G.11.	YES	NO			
	10.	The site at which the application area is located is a major source of HAP. If the response to Question VIII.G.10 is "NO," go to Section VIII.H.	YES	□NO			
	11.	The application area is using an alternative leak monitoring program as described in 40 CFR § 63.424(f).	YES	NO			

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	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.	YES	⊠NO		
		If the response to Question VIII.H.1 is "NO," go to Section VIII.I.				
	2.	The application area uses processes and materials specified in 40 CFR § 63.440(a)(1) - (3).	YES	□NO		
		If the response to Question VIII.H.2 is "NO," go to Section VIII.I.				
	3.	The application area includes one or more sources subject to 40 CFR Part 63, Subpart S that are existing sources. <i>If the response to Question VIII.H.3 is "NO," go to Section VIII.I.</i>	YES	□NO		
	4.	The application area includes one or more kraft pulping systems that are existing sources.	YES	NO		
	5.	The application area includes one or more dissolving-grade bleaching systems that are existing sources at a kraft or sulfite pulping mill.	YES	NO		
	6.	The application area includes bleaching systems that are existing sources and are complying with the Voluntary Advanced Technology Incentives Program for Effluent Limitation Guidelines in 40 CFR § 430.24. <i>If the response to Question VIII.H.6 is "NO," go to Section VIII.I.</i>	YES	NO		
	7.	The application area includes bleaching systems that are complying with 40 CFR § 63.440(d)(3)(i).	YES	NO		
	8.	The application area includes bleaching systems that are complying with 40 CFR § 63.440(d)(3)(ii).	YES	NO		

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

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

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	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)					
	Cont	ainers				
	11.	The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	YES	NO		
	Drai	ns				
	12.	The application area includes individual drain systems that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. If the response to Question VIII.J.12 is "NO," go to Question VIII.J.15.	YES	NO		
	13.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	YES	□NO		
	14.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	YES	NO		
	15.	The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of an elastomer product process unit. <i>If the response to Question VIII.J.15 is "NO," go to Section VIII.K.</i>	YES	□NO		
	16.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that meet the criteria listed in 40 CFR § 63.149(d) and § 63.501(a)(12). <i>If the response to Question VIII.J.16 is "NO," go to Section VIII.K.</i>	YES	□NO		

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

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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. If the response to Question VIII.L.1 is "NO" or "N/A," go to Section VIII.M.	YES	⊠NO □N/A		
	2.	The application area is using and approved alternate to the requirements of § 63.545(c)(1)-(5) for control of fugitive dust emission sources.	YES	□NO		
М.	Sub	part Y - National Emission Standards for Marine Tank Vessel Loading Operat	tions			
	1.	The application area includes marine tank vessel loading operations that are specified in 40 CFR § 63.560 and located at an affected source as defined in 40 CFR § 63.561.	YES	NO		
N.	Sub	part CC - National Emission Standards for Hazardous Air Pollutants from Pet	roleum F	Refineries		
	App	licability				
	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>	YES	NO		
	2.	All petroleum refining process units/and or related emission points within the application area are specified in 40 CFR § 63.640(g)(1) - (g)(7). <i>If the response to Question VIII.N.2 is "YES," go to Section VIII.O.</i>	□ YES	□NO		

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

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

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

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Form OP-	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)				
0.	Subp	oart DD - National Emission Standards for Off-site Waste and Recovery Opera	ations (co	ntinued)	
	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>	YES	NO	
	12.	VOHAP concentration is determined by direct measurement.	YES	NO	
	13.	VOHAP concentration is based on knowledge of the off-site material.	YES	NO	
	14.	The application area includes an equipment component that is a pump, compressor, and agitator, pressure relief device, sampling connection system, open-ended valve or line, valve, connector or instrumentation system. <i>If the response to Question VIII.O.14 is "NO," go to Question VIII.O.17.</i>	YES	NO	
	15.	An equipment component in the application area contains or contacts off-site material with a HAP concentration greater than or equal to 10% by weight.	YES	NO	
	16.	An equipment component in the application area is intended to operate 300 hours or more during a 12-month period.	YES	NO	
	17.	The application area includes containers that manage non-exempt off-site material.	YES	NO	
	18.	The application area includes individual drain systems that manage non-exempt off-site materials.	YES	□NO	

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

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Form	Form OP-REQ1: Page 54					
VIII.	II. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)					
	Q.		art - HH - National Emission Standards for Hazardous Air Pollutants From C uction Facilities (continued)	Dil and Na	atural Gas	
•		5.	The application area contains only a facility, prior to the point of custody transfer, with facility-wide actual annual average natural gas throughput less than 18.4 thousand standard cubic meters (649,789.9 ft ³) per day and a facility-wide actual annual average hydrocarbon liquid throughput less than 39,700 liters (10,487.6 gallons) per day. For SOP applications, if the response to Question VIII.Q.5 is "YES," go to Section VIII.R.	YES	□NO	
			For GOP applications, if the response to Question VIII.Q.5 is "YES," go to Section VIII.Z. For all applications, if the response to Question VIII.Q.5 is "NO," go to Question VIII.Q.9.			
•		6.	The application area includes a triethylene glycol (TEG) dehydration unit. For SOP applications, f the answer to Question VIII.Q.6 is "NO," go to Section VIII.R. For GOP applications, if the response to Question VIII.Q.6 is "NO," go to Section VIII.Z.	YES	NO	
•		7.	The application area is located at a site that is within the boundaries of UA plus offset or a UC, as defined in 40 CFR § 63.761.	YES	NO	
•		8.	The site has actual emissions of 5 tons per year or more of a single HAP, or 12.5 tons per year or more of a combination of HAP.	YES	NO	
•		9.	Emissions for major source determination are being estimated based on the maximum natural gas or hydrocarbon liquid throughput as calculated in § 63.760(a)(1)(i)-(iii).	YES	□NO	

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

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VIII.	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)						
	U.	Subpart PP - National Emission Standards for Containers (continued)					
		4.	The application area includes containers using Container Level 3 controls.	YES	NO		
	V.	Subj	part RR - National Emission Standards for Individual Drain Systems				
		1.	The application area includes individual drain systems for which another 40 CFR Part 60, 61, or 63 subpart references the use of 40 CFR Part 63, Subpart RR for the control of air emissions.	YES	NO		
	W.		part YY - National Emission Standards for Hazardous Air Pollutants for Source eric Maximum Achievable Control Technology Standards	e Catego	ories -		
		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	YES	⊠NO		
			Question VIII.W.20.				
		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. <i>If the response to Question VIII.W.6 is "NO," go to Question VIII.W.8.</i>	YES	NO		

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

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	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>				NO	
		16.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that meet the criteria listed in 40 CFR § $63.1106(c)(1) - (3)$. <i>If the response to Question VIII.W.16 is "NO," go to Question VIII.W.20.</i>	YES	NO	
		17.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds meeting the definition of organic HAP in Table 9 to 40 CFR Part 60, Subpart G, at any flow rate.	YES	NO	
		18.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds meeting the definition of organic HAP in Table 9 to 40 CFR Part 60, Subpart G, at an annual average flow rate greater than or equal to 10 liters per minute.	YES	NO	

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

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Form	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)					
		Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)				
	2	. The total annual benzene quantity from waste at the site is less than 10 Mg/yr as YES NO determined according to 40 CFR § 61.342(a).				
	2	. The application area contains at least one waste stream that is a continuous butadiene waste stream as defined in 40 CFR § 63.1082(b). If the response to Question VIII.W.26 is "NO," go to Question VIII.W.43.				
	2	. The waste stream(s) contains at least 10 ppmw 1, 3-butadiene at a flow rate of 0.02 liters per minute or is designated for control. If the response to Question VIII.W.27 is "NO," go to Question VIII.W.43.				
	2	 The control requirements of 40 CFR Part 63, Subpart G for process wastewater as specified in 40 CFR § 63.1095(a)(2) are selected for control of the waste stream(s). If the response to Question VIII.W.28 is "NO," go to Question VIII.W.33. 				
	2	. The application area includes containers that receive, manage, or treat aYESNO continuous butadiene waste stream.				
	2	. The application area includes individual drain systems that receive, manage, or treat a continuous butadiene waste stream. If the response to Question VIII.W.30 is "NO," go to Question VIII.W.43.				
	3	. 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.				

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Form OP-	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>			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>		□ YES	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>	YES	NO	
	35.	Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	YES	NO	
	36.	The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage a continuous butadiene waste stream. <i>If the response to Question VIII.W.36 is "NO," go to Question VIII.W.43.</i>	□ YES	NO	
	37.	The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. <i>If the response to Question VIII.W.37 is "YES," go to Question VIII.W.43.</i>	□ YES	□NO	

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

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

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

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

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Form OF	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.	□YES □NO			
	Con	tainers				
	14.	The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	YES NO			
	Drains					
	15.	The application area includes individual drain systems that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. If the response to Question VIII.X.15 is "NO," go to Question VIII.X.18.	□YES □NO			
	16.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	YES NO			
	17.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	YES NO			
	18.	The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of an thermoplastic product process unit. <i>If the response to Question VIII.X.18 is "NO," go to Section VIII.Y.</i>	□YES □NO			

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

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

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

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

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

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

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

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

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

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

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

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Form	n OP-	REQ1	: Page 78				
XI.	Mise	cellan	cellaneous (continued)				
	B.	For	ns				
•		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>	YES	⊠NO □N/A		
•		2.	Provide the Part and Subpart designation for the federal rule(s) or the Chapter, Su Division designation for the State regulation(s) in the space provided below.	bchapter,	and		
	C.	Emi	ssion Limitation Certifications				
•		1.	The application area includes units for which federally enforceable emission limitations have been established by certification.	YES	⊠NO		
	D.		rnative Means of Control, Alternative Emission Limitation or Standard, or Eq uirements	uivalent			
		1.	The application area is located at a site that is subject to a site-specific requirement of the state implementation plan (SIP).	YES	⊠NO		
		2.	The application area includes units located at the site that are subject to a site-specific requirement of the SIP.	YES	NO		
		3.	The application area includes units which demonstrate compliance by using an alternative means of control, alternative emission limitation or standard or equivalent requirements approved by the EPA Administrator. If the response to Question XI.D.3 is "YES," please include a copy of the approval document with the application.	YES	NO		
		4.	The application area includes units which demonstrate compliance by using an alternative means of control, alternative emission limitation or standard or equivalent requirements approved by the TCEQ Executive Director. <i>If the response to Question XI.D.4 is "YES," please include a copy of the approval document with the application.</i>	YES	NO		

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

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Forn	n OP-l	REQ1:	Page 80			
XI.	Misc	Aiscellaneous (continued)				
	G. 40 CFR Part 97, Subpart FFFFF - Texas SO ₂ Trading Program					
		1.	The application area includes emission units complying with the requirements of the Texas SO ₂ Trading Program. If the response to Question XI.G.1 is "NO," go to Question XI.G.6.	YES	NO	
		2.	The application area includes units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart B for SO ₂ and 40 CFR Part 75, Subpart H for heat input.	YES	NO	
		3.	The application area includes gas or oil-fired units that are complying with the monitoring requirements of 40 CFR Part 75, Appendix D for SO ₂ and heat input.	YES	□NO	
		4.	The application area includes gas or oil-fired units that are complying with the Low Mass Emissions monitoring requirements of 40 CFR § 75.19 for SO_2 and heat input.	YES	NO	
		5.	The application area includes units that are complying with EPA-approved alternative monitoring system requirements of 40 CFR Part 75, Subpart E for SO_2 and heat input.	YES	□NO	
		6.	The application area includes emission units that qualify for the Texas SO ₂ Trading Program retired unit exemption.	YES	NO	
	H.	Perm	nit Shield (SOP Applicants Only)			
		1.	A permit shield for negative applicability entries on Form OP-REQ2 (Negative Applicable Requirement Determinations) is being requested or already exists in the permit.	⊠YES	NO	

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

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

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Form	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>	⊠YES	□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>	⊠YES	□NO		
•		3.	The permit holder has submitted a CAM proposal on Form OP-MON in a previous application.	YES	□NO		
•		4.	The owner/operator or permit holder is submitting a CAM proposal on Form OP-MON according to the deadlines for submittals in 40 CFR § 64.5 in this application. If the responses to Questions XI.L.3 and XI.L.4 are both "NO," go to Section XI.M.	YES	⊠NO		
		5.	The owner/operator or permit holder is submitting a CAM implementation plan and schedule to be incorporated as enforceable conditions in the permit.	YES	NO		
		6.	Provide the unit identification numbers for the units for which the applicant is sub implementation plan and schedule in the space below.	mitting a	САМ		
•		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 \S 64.3(d)(2).	YES	NO		
•		8.	All units defined by XI.L.1 and XI.L.2 are using a CEMS, COMS or PEMS meeting the requirements of 40 CFR § 64.3(d)(2). <i>If the response to Question XI.L.8 is "YES," go to Section XI.M.</i>	YES	⊠NO		

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

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

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

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Form OP-REQ1: Page	87						
XII. NSR Authorizati	ons (Attach a	dditional sheets if n	ecessary	for sections E-J)			
E. PSD Permi	ts and PSD M	ajor 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 Technical Forms headin					ry Table located under the <u>tml</u> .		
F. Nonattainn	nent (NA) Per	mits and NA Major	· Pollutar	nts			
NA Permit No.:		Issuance Date:		Pollutant(s):			
NA Permit No.:		Issuance Date:		Pollutant(s):			
NA Permit No.:		Issuance Date:		Pollutant(s):			
NA Permit No.:		Issuance Date:		Pollutant(s):			
If NA Permits are held fo Technical Forms headin					y Table located under the <u>tml</u> .		
G. NSR Autho	orizations with	n FCAA § 112(g) Re	equireme	nts			
NSR Permit No.:	Issuance	Date:	NSR Pe	ermit No.:	Issuance Date:		
NSR Permit No.:	Issuance	Date:	NSR Pe	ermit No.:	Issuance Date:		
NSR Permit No.:	Issuance	Date:	NSR Pe	ermit No.:	Issuance Date:		
NSR Permit No.:	Issuance	Date:	NSR Pe	ermit No.:	Issuance Date:		
				Standard Permits, (mits) for the Applic	Other Authorizations ation Area		
Authorization No.: 19618	Issuance	Date: 11/21/2018	Authori	zation No.:	Issuance Date:		
Authorization No.:	Issuance	Date:	Authori	zation No.:	Issuance Date:		
Authorization No.:	Issuance	Date:	Authori	zation No.:	Issuance Date:		
Authorization No.:	Issuance	Date:	Authori	zation No.:	Issuance Date:		

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

Form OP-REQ1: Page 88 XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J) ٠ 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. Version No./Date: 11/01/2003 PBR No.: 106.261 PBR No.: 106.262 Version No./Date: 09/04/2000 PBR No.: 106.262 Version No./Date: 11/01/2003 PBR No.: 106.263 Version No./Date: 11/01/2001 PBR No.: 106.373 Version No./Date: 09/04/2000 PBR No.: 106.454 Version No./Date: 11/01/2001 PBR No.: 106.472 Version No./Date: 09/04/2000 PBR No.: 106.473 Version No./Date: 09/04/2000 PBR No.: 106.475 Version No./Date: 03/14/1997 Version No./Date: 09/04/2000 PBR No.: 106.478 PBR No.: 106.511 Version No./Date: 09/04/2000 PBR No.: Version No./Date: PBR No.: Version No./Date: PBR No.: Version No./Date: Version No./Date: PBR No.: Version No./Date: PBR No.: ٠ 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:**

4.2 **OP-REQ3: Applicable Requirements Summary**

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

Table 1a: Additions

Date: 06/11/2024	Regulated Entity No.: RN103012183	Permit No.: O-2308
Company Name: Sekisui Specialty Chemicals America	Area Name: Pasadena Plant	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	900-VAT	OP-UA4	R5212-03	VOC	Chapter 115	\$115.212(a)(1) \$115.212(a)(3)(B) [G] $\$115.212(a)(3)(C)$ [G] $\$115.212(a)(3)(C)$ \$115.214(a)(1)(B) \$115.214(a)(1)(C) \$115.212(a)(3)(A) \$115.212(a)(3)(A)(ii) \$115.212(a)(3)(A)(ii) \$115.212(a)(2) \$115.212(a)(3)(D) \$115.212(a)(1)(B)
2	900-VAT	OP-UA4	63G-03	HAPS	MACT G	§63.126(c)

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

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

Table 1b: Additions

Date: 06/11/2024	Regulated Entity No.: RN103012183	Permit No.: O-2308
Company Name: Sekisui Specialty Chemicals America	Area Name: Pasadena Plant	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	900-VAT	R5212-03	VOC		<pre>\$115.216 \$115.216(2) \$115.216(3)(A) \$115.216(3)(A)(i) \$115.216(3)(A)(ii) \$115.216(3)(A)(iii) \$115.216(3)(B)</pre>	None.
2	900-VAT	63G-03	HAPS	None.	<pre>§63.130(f) §63.130(f)(1) §63.130(f)(2) §63.130(f)(3) §63.130(f)(3)(i) §63.130(f)(3)(ii)</pre>	§63.152(c)(4)(iii)

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

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

Table 2a: Deletions

Date: 06/11/2024	Regulated Entity No.: RN103012183	Permit No.: O-2308
Company Name: Sekisui Specialty Chemicals America	Area Name: Pasadena Plant	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
1	P-62.01	OP-REQ3	R7300-01	Exempt	Chapter 117	[G]§117.303(a)(10) [G]§117.310(f)
1	P-62.01	OP-REQ3	63ZZZ-01	HAPS	MACT ZZZZ	<pre>§63.6602-Table2c.1 §63.6595(a)(1) §63.6605(a) §63.6605(b) §63.6625(e) §63.6625(c) §63.6625(c) §63.6640(f)(1) §63.6640(f)(2) §63.6640(f)(2)(c) §63.6640(f)(2)(c)</pre>

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

Applicable Requirements Summary Form OP-REQ3 (Page 4) Federal Operating Permit Program

Table 2b: Deletions

Date: 06/11/2024	Regulated Entity No.: RN103012183	Permit No.: O-2308
Company Name: Sekisui Specialty Chemicals America	Area Name: Pasadena Plant	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
1	P-62.01	OP-REQ3	R7300-01	Exempt	None.	<pre>§117.340(j) [G]§117.345(f)(10) [G]§117.345(f)(6)</pre>	None.
1	P-62.01	OP-REQ3	63ZZZ-01	HAPS	<pre>§63.6625(f) §63.6625(i) §63.6640(a) §63.6640(a)-Table6.9.a.ii §63.6640(a)-Table6.9.a.ii</pre>	<pre>§ 63.6625(i) § 63.6655(d) § 63.6655(e) § 63.6655(f) § 63.6660(a) § 63.6660(b) § 63.6660(c)</pre>	§ 63.6640(e) § 63.6650(f)

5. COMPLIANCE CERTIFICATION FORMS

5.1 **OP-ACPS: Application Compliance Plan and Schedule**

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

Date	e: 06/11/2024	Regulated Entity No.: RN103012183		Permit No.: O-2308			
Com	ipany Name: Sekisu	ii Specialty Chemicals America, LLC	A	rea Name: Pasadena Pla	ant		
• 1	information contained in this form in accordance with 30 TAC § 122.132(d)(8).						
Part	Part 1						
Α.	A. Compliance Plan — Future Activity Committal Statement						
As th appli	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.						
В.		ication - Statement for Units in Comp by entering an "X" in the appropriate					
1.	of this form (Part 2, specified in the asso	of those emission units listed in the Com below), and based, at minimum, on the ociated applicable requirements, are all compliance with all their respective app plication?	co en	mpliance method hission units addressed	YES 🗌 NO		
2.	Are there any non-c Section of this form	compliance situations addressed in the C (Part 2)?	Coi	npliance Schedule	🗌 YES 🖾 NO		
3.		em B.2, above, is "Yes," indicate the tota ed in this submittal. <i>(For reference only)</i>	al ı	number of Part 2			
*	* 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.						
		be assessed based, at a minimum, on t orting requirements, as appropriate, ass					

Texas Commission on Environmental Quality

Title V Existing

2308

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	PASADENA PLANT
Does the site have a physical address?	Yes
Physical Address	
Number and Street	1423 PASADENA FWY
City	PASADENA
State	ТХ
ZIP	77506
County	HARRIS
Latitude (N) (##.######)	29.715
Longitude (W) (-###.######)	95.190833
Primary SIC Code	2869
Secondary SIC Code	
Primary NAICS Code	325199
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN103012183
What is the name of the Regulated Entity (RE)?	SEKISUI SPECIALTY CHEMICALS AMERICA PASADENA PLANT
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	1423 PASADENA FWY
City	PASADENA
State	ТХ
ZIP	77506
County	HARRIS
Latitude (N) (##.######)	29.717222
Longitude (W) (-###.######)	-95.190833
Facility NAICS Code	
What is the primary business of this entity?	

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN603507849
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Sekisui Specialty Chemicals America, LLC
Texas SOS Filing Number	801130048
Federal Tax ID	800404851
State Franchise Tax ID	32039644813

State Sales Tax ID Local Tax ID DUNS Number Number of Employees Independently Owned and Operated?

Responsible Official Contact

Person TCEQ should contact for questions about this application: SEKISUI SPECIALTY CHEMICALS AMERICA **Organization Name** LLC Prefix MR First JEFFREY Middle Last THOMPSON Suffix Credentials Title SITE LEADER Enter new address or copy one from list: Mailing Address Address Type Domestic Mailing Address (include Suite or Bldg. here, if 1423 PASADENA FWY applicable) Routing (such as Mail Code, Dept., or Attn:) City PASADENA State ТΧ ZIP 77506 Phone (###-####) 7134561507 Extension Alternate Phone (###-####) Fax (###-###-####) E-mail jeffrey.thompson@sekisui-sc.com

Technical Contact

Person TCEQ should contact for questions about this application: Select existing TC contact or enter a new contact. Organization Name Prefix First First Middle Last Suffix Credentials Title Enter new address or copy one from list: Mailing Address

JENNA TIMTIMAN(SEKISUI SPECIAL...)

SEKISUI SPECIALTY CHEMICALS AMERICA LLC MS JENNA

TIMTIMAN

ENVIRONMENTAL ENGINEER

830858309

Title V General Information - Existing

Domestic 1423 PASADENA FWY

PASADENA TX 77506 7134561555

7134561554 jenna.timtiman@sekisui-sc.com

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	29 Deg 42 Min 54 Sec
3) Permit Longitude Coordinate:	95 Deg 11 Min 27 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)

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 Attribut	e) Forms
If applicable, attach OP-AR	1 (Acid Rain Permit Application)
Attach OP-CRO2 (Change	of Responsible Official Information)
Attach OP-DEL (Delegation	of Responsible Official)
, ,	information needed to complete the permit.
[File Properties]	
File Name	<a href="/ePermitsExternal/faces/file?<br">fileId=201348>Sekisui TV O2308 Renewal Application 2024 0611.pdf
Hash	CCDDA3DB58DE915E6E1F901228553D26353D694BD76F73D248492F46B74F063C
MIME-Type	application/pdf
An additional space to attac	ch any other necessary information needed to complete the permit.

Expedite Title V

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

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 Jeffrey Thompson, the owner of the STEERS account ER032331.
- 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 2308.
- 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: Jeffrey Thompson OWNER OPERATOR

Account Number:	ER032331
Signature IP Address:	63.145.96.106
Signature Date:	2024-06-11
Signature Hash:	2B5B9CC3D7236265B04567E5A739D2288F5A76F0A9E7A0CEF2B02D1B99CF4862
Form Hash Code at time of Signature:	C5E93D6C90C89BBDD97393F694DBEE495476AB7FE069E470D262F6B2516AB73E

No

Submission

Reference Number: Submitted by:

Submitted Timestamp:

Submitted From:

Confirmation Number: Steers Version: Permit Number:

Additional Information

Application Creator: This account was created by Jenna Timtiman

The application reference number is 660143 The application was submitted by ER032331/Jeffrey Thompson The application was submitted on 2024-06-11 at 14:27:10 CDT The application was submitted from IP address 63.145.96.106 The confirmation number is 544937 The STEERS version is 6.77 The permit number is 2308 Please process. Thanks!

-----Original Message-----From: steers@tceq.texas.gov <steers@tceq.texas.gov> Sent: Tuesday, June 11, 2024 2:27 PM To: RFCAIR12 <RFCAIR12@tceq.texas.gov>; air_permits@pcs.hctx.net; modaniel@ci.pasadena.tx.us; TVAPPS <tvapps@tceq.texas.gov> Subject: STEERS Title V Application Submittal (New Application)

The TV-E application has been successfully submitted by JEFFREY THOMPSON. The submittal was received at 06/11/2024 02:27 PM.

The Reference number for this submittal is 660143

The confirmation number for this submittal is 544937. The Area ID for this submittal is 2308. The Project ID for this submittal is 36728. The hash code for this submittal is C5E93D6C90C89BBDD97393F694DBEE495476AB7FE069E470D262F6B2516AB73E.

You may access the original application submittal and the notice of final action documents from the COR Viewer which is available at <u>https://ida.tceq.texas.gov/steersstaff/index.cfm?</u> <u>fuseaction=openadmin.submitlog&newsearch=yes</u>.

If you have any questions, please contact the STEERS Help Line at 512-239-6925 or by e-mail at steers@tceq.texas.gov.