

Texas Commission on Environmental Quality

Title V Existing

2426

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	PRYSMIAN CABLES AND SYSTEMS
Does the site have a physical address?	No
Because there is no physical address, describe how to locate this site:	9975 US HWY 80 E
City	Scottsville
State	TX
ZIP	75688
County	HARRISON
Latitude (N) (##.#####)	32.516388
Longitude (W) (-###.#####)	94.227222
Primary SIC Code	3357
Secondary SIC Code	
Primary NAICS Code	331319
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN100236017
What is the name of the Regulated Entity (RE)?	PRYSMIAN CABLES AND SYSTEMS
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	9975 US HIGHWAY 80 E
City	SCOTTSVILLE
State	TX
ZIP	75688
County	HARRISON
Latitude (N) (##.#####)	32.516111
Longitude (W) (-###.#####)	-94.228055
Facility NAICS Code	
What is the primary business of this entity?	MANUFACTURER OF LOW MED HIGH VOLT CABLE

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN605993161
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Prysmian Cables and Systems USA, LLC
Texas SOS Filing Number	703635623
Federal Tax ID	
State Franchise Tax ID	15710615111
State Sales Tax ID	

Local Tax ID	
DUNS Number	
Number of Employees	501+
Independently Owned and Operated?	Yes

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	PRYSMIAN CABLES AND SYSTEMS USA LLC
Prefix	MR
First	JOSE
Middle	
Last	FERDINAND CARR
Suffix	
Credentials	
Title	PLANT DIRECTOR
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 430
Routing (such as Mail Code, Dept., or Attn:)	
City	SCOTTSVILLE
State	TX
ZIP	75688
Phone (###-###-####)	6156749099
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	fred.carr@prysmian.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

Organization Name	ROBERT ROCKWELL(PRYSMIAN CABLES...) PRYSMIAN CABLES AND SYSTEMS USA LLC
Prefix	MR
First	ROBERT
Middle	
Last	ROCKWELL
Suffix	
Credentials	
Title	EHS MANAGER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic

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

PO BOX 430

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

City

SCOTTSVILLE

State

TX

ZIP

75688

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

9032651074

Extension

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

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

E-mail

robert.rockwell@prysmian.com

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	32 Deg 30 Min 59 Sec
3) Permit Longitude Coordinate:	94 Deg 13 Min 38 Sec
4) Is this submittal a new application or an update to an existing application?	Update
4.1. Select the permit/project number for which this update should be applied.	2426-37080
5) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	N/A

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

[File Properties]

File Name

OP-1 8192025.pdf

Hash

8B88545EBD51C25F23A062CB793FB1F385BBC9A1DE76FA619A22B741A6117164

MIME-Type

application/pdf

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)

[File Properties]

File Name

OP_PBRSUP_Attachment 1-OP-PBRSUP 8182025.pdf

Hash

3AB1C244D31CA27E3F51214365B217F27D0E76992A766F3819ED8EEEDA0C4BE7

MIME-Type

application/pdf

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

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

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

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

Certification

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

1. I am Jose Ferdinand Carr, the owner of the STEERS account ER112085.
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 2426.
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: Jose Ferdinand Carr OWNER OPERATOR

Account Number:	ER112085
Signature IP Address:	208.251.0.0
Signature Date:	2025-08-20
Signature Hash:	FF0A190C106C2FAC095C2C3F97A9A15D7D7375A229A538A0DFD3700E501A5D43
Form Hash Code at time of Signature:	EE1D578CA20C5EBE39FFC940FE2113B7FCD0BFEAD9B61D42346819090DF246BF

Submission

Reference Number:	The application reference number is 810185
Submitted by:	The application was submitted by ER112085/Jose Ferdinand Carr

Submitted Timestamp:

The application was submitted on 2025-08-20 at 08:56:24 CDT

Submitted From:

The application was submitted from IP address 208.251.0.0

Confirmation Number:

The confirmation number is 672445

Steers Version:

The STEERS version is 6.92

Permit Number:

The permit number is 2426

Additional Information

Application Creator: This account was created by Arthi R Reddy

**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: Prysmian Cables and Systems USA, LLC
B. Customer Reference Number (CN): CN605993161
C. Submittal Date (mm/dd/yyyy): 08/19/2025
II. Site Information
A. Site Name: Prysmian Cables and Systems
B. Regulated Entity Reference Number (RN): RN100236017
C. Indicate affected state(s) required to review permit application: <i>(Check the appropriate box[es].)</i>
<input type="checkbox"/> AR <input type="checkbox"/> CO <input type="checkbox"/> KS <input checked="" type="checkbox"/> LA <input type="checkbox"/> NM <input type="checkbox"/> OK <input type="checkbox"/> N/A
D. Indicate all pollutants for which the site is a major source based on the site's potential to emit: <i>(Check the appropriate box[es].)</i>
<input type="checkbox"/> VOC <input type="checkbox"/> NO _x <input type="checkbox"/> SO ₂ <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> CO <input type="checkbox"/> Pb <input checked="" type="checkbox"/> HAPS
Other:
E. Is the site a non-major source subject to the Federal Operating Permit Program? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
F. Is the site within a local program area jurisdiction? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
G. Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
H. Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging: N/A
III. Permit Type
A. Type of Permit Requested: <i>(Select only one response)</i>
<input checked="" type="checkbox"/> Site Operating Permit (SOP) <input type="checkbox"/> Temporary Operating Permit (TOP) <input type="checkbox"/> General Operating Permit (GOP)

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

IV. Initial Application Information <i>(Complete for Initial Issuance Applications Only.)</i> N/A
A. Is this submittal an abbreviated or a full application? <input type="checkbox"/> Abbreviated <input type="checkbox"/> Full
B. If this is a full application, is the submittal a follow-up to an abbreviated application? <input type="checkbox"/> YES <input type="checkbox"/> NO
C. If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit? <input type="checkbox"/> YES <input type="checkbox"/> NO
D. Has an electronic copy of this application been submitted (or is being submitted) to EPA? (Refer to the form instructions for additional information.) <input type="checkbox"/> YES <input type="checkbox"/> NO
E. Has the required Public Involvement Plan been included with this application? <input type="checkbox"/> YES <input type="checkbox"/> NO
V. Confidential Information
A. Is confidential information submitted in conjunction with this application? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
VI. Responsible Official (RO) Identifying Information
RO Name Prefix: (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
RO Full Name: Jose Ferdinand Carr
RO Title: Plant Director
Employer Name: Prysmian Cables and Systems US Inc.
Mailing Address: PO Box 430
City: Scottsville
State: TX
ZIP Code: 75688-0430
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (615) 674-9099
Fax No.:
Email: fred.carr@prysmian.com

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

VII. Technical Contact Identifying Information <i>(Complete if different from RO.)</i>
Technical Contact Name Prefix: (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Technical Contact Full Name: Robert Rockwell
Technical Contact Title: EHS Manager
Employer Name: Prysmian Cables and Systems US Inc.
Mailing Address: PO Box 430
City: Scottsville
State: TX
ZIP Code: 75688-0430
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (903) 265-1074
Fax No.:
Email: Robert.rockwell@prysmiangroup.com
VIII. Reference Only Requirements <i>(For reference only.)</i>
A. State Senator: Bryan Hughes
B. State Representative: Jay Dean
C. Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
D. Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
E. Indicate the alternate language(s) in which public notice is required: Spanish

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

IX. Off-Site Permit Request <i>(Optional for applicants requesting to hold the FOP and records at an off-site location.)</i>
A. Office/Facility Name: N/A
B. Physical Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
C. Physical Location:
D. Contact Name Prefix: (<input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Contact Full Name:
E. Telephone No.:
X. Application Area Information
A. Area Name: Prysmian Cables and Systems
B. Physical Address: 9975 US HWY 80 E
City: Scottsville
State: TX
ZIP Code: 75688
C. Physical Location: 0.5 miles east of FM 2199 on Highway 80 East
D. Nearest City: Scottsville
E. State: TX
F. ZIP Code: 75688

**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): 32° 30' 59.06"
H. Longitude (nearest second): 94° 13' 38.3"
I. Are there any emission units that were not in compliance with the applicable requirements identified in the application at the time of application submittal? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
J. Indicate the estimated number of emission units in the application area: 7
K. Are there any emission units in the application area subject to the Acid Rain Program? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
XI. Public Notice (Complete this section for SOP Applications and Acid Rain Permit Applications only.)
A. Name of a public place to view application and draft permit: USPS Scottsville Post Office
B. Physical Address: 8657 US HWY 80 E
City: Scottsville
ZIP Code: 75688
C. Contact Person (Someone who will answer questions from the public during the public notice period):
Contact Name Prefix: (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.):
Contact Person Full Name: Robert Rockwell
Contact Mailing Address: PO Box 430
City: Scottsville
State: TX
ZIP Code: 75688-0430
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (903) 265-1074

**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.) N/A

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.) N/A

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:

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
8/18/2025	O-2426	RN100236017

Unit ID No.	Registration No.	PBR No.	Registration Date
CABLE MANUFACT (Wire Drawer #7)	82175	106.262	6/29/2007
Pellet Receiving and Storage (Fabric Filter)	74613	106.261	2/9/2005
CL-01-16	140882	106.433	7/15/2016
SILO 90-1	78077	106.261	3/1/2006

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
8/18/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date
Wire Pre Heater	008	05/08/1972
Laboratory Equipment	034	07/20/1992
Wire Drawing	036	03/15/1985
Shop Welding	039	03/15/1985
1012 (Used Oil Tank)	059	05/08/1972
1013 (Used Oil Tank)	059	05/08/1972
1014 (Lube Bin 1)	059	05/08/1972
1016 (Lube Bin 3)	059	05/08/1972
1017 (Lube Bin 4)	059	05/08/1972
Shop Welding	070	03/15/1985
Propane Storage	083	03/15/1985
BLDG-2 (Cable Labeling)	089	09/23/1982
BREAKER PLATE (Breaker Plate Cleaning)	106	07/20/1992
Refrigeration Systems	103	03/15/1985

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
8/18/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date
Abrasive Cleaning Operations	102	7/20/1992
Air Conditioning and Ventilation Systems	106.103	09/04/2000
Laboratory Equipment	106.122	09/04/2000
HEAT 1-A-M	106.183	09/04/2000
HEAT 1-N	106.183	09/04/2000
HEAT 1-O	106.183	09/04/2000
HEAT 2-A	106.183	09/04/2000
HEAT 2-B	106.183	09/04/2000
HEAT 3	106.183	09/04/2000
HEAT 4-11	106.183	09/04/2000
HEAT BLDG-1	106.183	09/04/2000
ANNEAL01	106.183	09/04/2000

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
8/18/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date
Shop Welding	106.227	09/04/2000
Hand Held Manually Operated Machines	106.265	09/04/2000
Vaccum Cleaning System	106.266	09/04/2000
Wire Drawing (AD-01-16; AD-02-16)	106.317	09/04/2000
Rubber and Plastic Curing Process	106.391	09/04/2000
Enclosed Abrasive Cleaning	106.452	09/04/2000
BLDG-4 (Cold Solvent Cleaners & Degreasing)	106.454	11/01/2001
EMGCYGEN	106.511	09/4/2000
1003 (Pellet Storage Silo)	106.261	11/01/2003
1008 (Test Bin)	106.261	11/01/2003

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

Date	Permit Number	Regulated Entity Number
8/18/2025	O-2426	RN100236017

PBR No.	Version No./Date

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

Date	Permit Number	Regulated Entity Number
8/18/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
CABLE MANUFACT (Wire Drawer #7)	106.262	82175	Compliance demonstration with 106.8 and 106.4 for any consecutive 12 month period by maintaining records regarding the quantity of air contaminants emitted by the facility.
Pellet Receiving and Storage (Fabric Filter)	106.261	74613	Visible emissions, except uncombined water, to the atmosphere from any point or fugitive source shall not exceed 5.0% opacity in any six-minute period using Method 9. Compliance with 106.4 and 106.8.
CL-01-16	106.433	140882	Visible emissions, except uncombined water, to the atmosphere from any point or fugitive source shall not exceed 5.0% opacity in any six-minute period using Method 9. Data of daily coatings and solvent use and the actual hours of operation of each coating or stripping operation; A monthly report that represents actual hours of operation each day, and emissions from each operation in terms of pounds per hour; pound per day; pounds per week and tons emitted from the site during the previous 12 months. Records as per 106.8.
SILO 90-1	106.261	78077	Visible emissions, except uncombined water, to the atmosphere from any point or fugitive source shall not exceed 5.0% opacity in any six-minute period using Method 9. Compliance with 106.4 and 106.8

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
8/18/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
Wire Pre Heater	008	05/08/1972	Monitor fuel consumption rate.
Laboratory Equipment	034	07/20/1992	Maintain equipment records used for chemical and physical analyses
Wire Drawing	036	03/15/1985	Maintain equipment records.
Shop Welding	039	03/15/1985	Maintain equipment operating hours and material usage records.
1012 (Used Oil Tank)	059	05/08/1972	Maintain records of tank throuput.
1013 (Used Oil Tank)	059	05/08/1972	Maintain records of tank throuput.
1014 (Lube Bin 1)	059	05/08/1972	Maintain records of tank throuput.
1016 (Lube Bin 3)	059	05/08/1972	Maintain records of tank throuput.
1017 (Lube Bin 4)	059	05/08/1972	Maintain records of tank throuput.

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
8/18/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
Shop Welding	070	03/15/1985	Maintain equipment operating hours and material usage records.
Propane Storage	083	03/15/1985	Maintain records of tank throughput
BLDG-2 (Cable Labeling)	089	09/23/1982	Maintain records of operating hours and surface coatings usage
BREAKER PLATE (Breaker Plate Cleaning)	106	07/20/1992	Monitor visible emission not to exceed 5% opacity in any five minute period and records of emissions activity not to exceed the exemption limitations.
Refrigeration Systems	103	03/15/1985	Maintain records of activity
Abrasive Cleaning Operations	102	7/20/1992	Maintain records of material usage and hours of operation
Air Conditioning and Ventilation Systems	106.103	09/04/2000	Recordkeeping requirements as per 106.8 to demonstrate compliance with PBR claimed
Laboratory Equipment	106.122	09/04/2000	Recordkeeping requirements as per 106.8 to demonstrate compliance with PBR claimed

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
8/18/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
HEAT 1-A-M HEAT 1-N HEAT 1-O HEAT 2-A HEAT 2-B HEAT 3 HEAT 4-11 HEAT BLDG-1	106.183	09/04/2000	Recordkeeping requirements as per 106.8 to demonstrate compliance with PBR claimed
ANNEAL01	106.183	09/04/2000	Recordkeeping requirements as per 106.8 to demonstrate compliance with PBR claimed
Hand Held Manually Operated Machines	106.265	09/04/2000	Recordkeeping to demonstrate compliance with PBR claimed
Vaccum Cleaning System	106.266	09/04/2000	Recordkeeping to demonstrate compliance with PBR claimed
Wire Drawing (AD-01-16; AD-02-16)	106.317	09/04/2000	Recordkeeping requirements as per 106.8 to demonstrate compliance with PBR claimed
Rubber and Plastic Curing Process	106.391	09/04/2000	Recordkeeping requirements as per 106.8 to demonstrate compliance with PBR claimed

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
8/18/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
Enclosed Abrasive Cleaning	106.452	09/04/2000	Records of operating hours, material usage and other recordkeeping as per 106.8 to demonstrate compliance with PBR claimed.
BLDG-4 (Cold Solvent Cleaners & Degreasing)	106.454	11/01/2001	Records of solvents usage on monthly basis and compliance with 106.8.
EMGCYGEN	106.511	09/4/2000	Annual hours not to exceed 10% of the normal operating schedule and compliance with PBR and other applicable regulations.
1003(Pellet Storage Silo)	106.261	11/01/2003	Visible emissions and recordkeeping as per 106.8 to demonstrate compliance.
1008(Test Bin)	106.261	11/01/2003	Visible emissions and recordkeeping as per 106.8 to demonstrate compliance.
Shop Welding	106.227	09/04/2000	Records of operating hours, material usagea and compliance as per the required PBR and 106.8.

Texas Commission on Environmental Quality

Title V Existing

2426

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	PRYSMIAN CABLES AND SYSTEMS
Does the site have a physical address?	No
Because there is no physical address, describe how to locate this site:	9975 US HWY 80 E
City	Scottsville
State	TX
ZIP	75688
County	HARRISON
Latitude (N) (##.#####)	32.516388
Longitude (W) (-###.#####)	94.227222
Primary SIC Code	3357
Secondary SIC Code	
Primary NAICS Code	331319
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN100236017
What is the name of the Regulated Entity (RE)?	PRYSMIAN CABLES AND SYSTEMS
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	9975 US HIGHWAY 80 E
City	SCOTTSVILLE
State	TX
ZIP	75688
County	HARRISON
Latitude (N) (##.#####)	32.516111
Longitude (W) (-###.#####)	-94.228055
Facility NAICS Code	
What is the primary business of this entity?	MANUFACTURER OF LOW MED HIGH VOLT CABLE

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN605993161
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Prysmian Cables and Systems USA, LLC
Texas SOS Filing Number	703635623
Federal Tax ID	
State Franchise Tax ID	15710615111
State Sales Tax ID	

Local Tax ID	
DUNS Number	
Number of Employees	501+
Independently Owned and Operated?	Yes

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	PRYSMIAN CABLES AND SYSTEMS USA LLC
Prefix	MR
First	JOSE
Middle	
Last	FERDINAND CARR
Suffix	
Credentials	
Title	PLANT DIRECTOR
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	9975 US HWY 80 E
Routing (such as Mail Code, Dept., or Attn:)	
City	SCOTTSVILLE
State	TX
ZIP	75688
Phone (###-###-####)	6156749099
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	fred.carr@prysmian.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.	New Contact
Organization Name	Prysmian Cables and Systems USA LLC
Prefix	MR
First	Robert
Middle	
Last	Rockwell
Suffix	
Credentials	
Title	EHS Manager
Enter new address or copy one from list:	Responsible Official Contact
Mailing Address	
Address Type	Domestic

Mailing Address (include Suite or Bldg. here, if applicable)	9975 US HWY 80 E
Routing (such as Mail Code, Dept., or Attn:)	
City	SCOTTSVILLE
State	TX
ZIP	75688
Phone (###-###-####)	9032651074
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	robert.rockwell@prysmian.com

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	32 Deg 30 Min 59 Sec
3) Permit Longitude Coordinate:	94 Deg 13 Min 38 Sec
4) Is this submittal a new application or an update to an existing application?	Update
4.1. Select the permit/project number for which this update should be applied.	2426-37080
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)	
[File Properties]	
File Name	OP_PBRSUP_Attachment 1-OP-PBRSUP.pdf
Hash	455077F1443951EFF87901F456AAA3F21F2E08A7B8866318458731119651D57D
MIME-Type	application/pdf
Attach OP-SUMR (Individual Unit Summary for Revisions)	
Attach OP-MON (Monitoring Requirements)	
Attach OP-UA (Unit Attribute) Forms	

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

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name	2. 10009 Form OPCRO1.pdf
Hash	5B524760C86A211A0C3A2314E77C067C44944A869A71C4F68D28E2EED2022601
MIME-Type	application/pdf

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

Certification

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

1. I am Jose Ferdinand Carr, the owner of the STEERS account ER112085.
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 2426.
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: Jose Ferdinand Carr OWNER OPERATOR

Account Number:	ER112085
Signature IP Address:	24.35.151.212
Signature Date:	2025-07-29
Signature Hash:	FF0A190C106C2FAC095C2C3F97A9A15D7D7375A229A538A0DFD3700E501A5D43
Form Hash Code at time of Signature:	6A6B736F6514AC1C94CFB11C99FC15ACC296E780353A75415A0B3EBEC898628D

Submission

Reference Number:	The application reference number is 804017
Submitted by:	The application was submitted by ER112085/Jose Ferdinand Carr

Submitted Timestamp:

The application was submitted on 2025-07-29 at 11:26:52 CDT

Submitted From:

The application was submitted from IP address 24.35.151.212

Confirmation Number:

The confirmation number is 667682

Steers Version:

The STEERS version is 6.92

Permit Number:

The permit number is 2426

Additional Information

Application Creator: This account was created by Arthi R Reddy

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: RN100236017		CN: CN605993161		Account No.: HH-0001-D	
Permit No.: O-2426			Project No.: 37080		
Area Name: Prysmian Cables and Systems			Company Name: Prysmian Cables and Systems USA, LLC		
II. Certification Type <i>(Please mark the appropriate box)</i>					
<input checked="" type="checkbox"/> Responsible Official			<input type="checkbox"/> Duly Authorized Representative		
III. Submittal Type <i>(Please mark the appropriate box) (Only one response can be accepted per form)</i>					
<input type="checkbox"/> SOP/TOP Initial Permit Application		<input checked="" type="checkbox"/> Update to Permit Application			
<input type="checkbox"/> GOP Initial Permit Application		<input type="checkbox"/> Permit Revision, Renewal, or Reopening			
<input type="checkbox"/> Other: _____					
IV. Certification of Truth					
This certification does not extend to information which is designated by the TCEQ as information for reference only.					
I, <u>Jose Ferdinand Carr</u> certify that I am the <u>RO</u> <div style="text-align: center;"><i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i></div>					
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:					
<i>Note: Enter Either a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>					
Time Period: From <u>10/30/2024</u> to <u>7/28/2025</u> <div style="text-align: center;"><i>Start Date</i> <i>End Date</i></div>					
Specific Dates: <u>7/28/2025</u> _____ <div style="text-align: center;"><i>Date 1</i> <i>Date 2</i> <i>Date 3</i> <i>Date 4</i> <i>Date 5</i> <i>Date 6</i></div>					
Signature: <u>Signed via TCEQ STEERS</u> Signature Date: _____					
Title: <u>Plant Director</u>					

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
7/25/2025	O-2426	RN100236017

Unit ID No.	Registration No.	PBR No.	Registration Date
CABLE MANUFACT (Wire Drawer #7)	82175	106.262	6/29/2007
Pellet Receiving and Storage (Fabric Filter)	74613	106.261	2/9/2005
CL-01-16	140882	106.433	7/15/2016
SILO 90-1	78077	106.261	3/1/2006

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
7/25/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date
Wire Pre Heater	008	05/08/1972
Laboratory Equipment	034	07/20/1992
Wire Drawing	036	03/15/1985
Shop Welding	039	03/15/1985
1012 (Used Oil Tank)	059	05/08/1972
1013 (Used Oil Tank)	059	05/08/1972
1014 (Lube Bin 1)	059	05/08/1972
1016 (Lube Bin 3)	059	05/08/1972
1017 (Lube Bin 4)	059	05/08/1972
Shop Welding	070	03/15/1985
Propane Storage	083	03/15/1985
BLDG-2 (Cable Labeling)	089	09/23/1982
BREAKER PLATE (Breaker Plate Cleaning)	106	07/20/1992
Refrigeration Systems	103	03/15/1985

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
7/25/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date
Abrasive Cleaning Operations	102	7/20/1992
Air Conditioning and Ventilation Systems	106.103	09/04/2000
Laboratory Equipment	106.122	09/04/2000
HEAT 1-A-M	106.183	09/04/2000
HEAT 1-N	106.183	09/04/2000
HEAT 1-O	106.183	09/04/2000
HEAT 2-A	106.183	09/04/2000
HEAT 2-B	106.183	09/04/2000
HEAT 3	106.183	09/04/2000
HEAT 4-11	106.183	09/04/2000
HEAT BLDG-1	106.183	09/04/2000
ANNEAL01	106.183	09/04/2000

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
7/25/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date
Shop Welding	106.227	09/04/2000
Hand Held Manually Operated Machines	106.265	09/04/2000
Vaccum Cleaning System	106.266	09/04/2000
Wire Drawing (AD-01-16; AD-02-16)	106.317	09/04/2000
Rubber and Plastic Curing Process	106.391	09/04/2000
Enclosed Abrasive Cleaning	106.452	09/04/2000
BLDG-4 (Cold Solvent Cleaners & Degreasing)	106.454	11/01/2001
EMGCYGEN	106.511	09/4/2000
1003 (Pellet Storage Silo)	106.261	11/01/2003
1008 (Test Bin)	106.261	11/01/2003

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

Date	Permit Number	Regulated Entity Number
7/25/2025	O-2426	RN100236017

PBR No.	Version No./Date

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

Date	Permit Number	Regulated Entity Number
7/25/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
CABLE MANUFACT (Wire Drawer #7)	106.262	82175	Compliance demonstration with 106.8 and 106.4 for any consecutive 12 month period by maintaining records regarding the quantity of air contaminants emitted by the facility.
Pellet Receiving and Storage (Fabric Filter)	106.261	74613	Visible emissions, except uncombined water, to the atmosphere from any point or fugitive source shall not exceed 5.0% opacity in any six-minute period using Method 9. Compliance with 106.4 and 106.8.
CL-01-16	106.433	140882	Visible emissions, except uncombined water, to the atmosphere from any point or fugitive source shall not exceed 5.0% opacity in any six-minute period using Method 9. Data of daily coatings and solvent use and the actual hours of operation of each coating or stripping operation; A monthly report that represents actual hours of operation each day, and emissions from each operation in terms of pounds per hour; pound per day; pounds per week and tons emitted from the site during the previous 12 months. Records as per 106.8.
SILO 90-1	106.261	78077	Visible emissions, except uncombined water, to the atmosphere from any point or fugitive source shall not exceed 5.0% opacity in any six-minute period using Method 9. Compliance with 106.4 and 106.8

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
7/25/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
Wire Pre Heater	008	05/08/1972	Monitor fuel consumption rate.
Laboratory Equipment	034	07/20/1992	Maintain equipment records used for chemical and physical analyses
Wire Drawing	036	03/15/1985	Maintain equipment records.
Shop Welding	039	03/15/1985	Maintain equipment operating hours and material usage records.
1012 (Used Oil Tank)	059	05/08/1972	Maintain records of tank throuput.
1013 (Used Oil Tank)	059	05/08/1972	Maintain records of tank throuput.
1014 (Lube Bin 1)	059	05/08/1972	Maintain records of tank throuput.
1016 (Lube Bin 3)	059	05/08/1972	Maintain records of tank throuput.
1017 (Lube Bin 4)	059	05/08/1972	Maintain records of tank throuput.

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
7/25/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
Shop Welding	070	03/15/1985	Maintain equipment operating hours and material usage records.
Propane Storage	083	03/15/1985	Maintain records of tank throughput
BLDG-2 (Cable Labeling)	089	09/23/1982	Maintain records of operating hours and surface coatings usage
BREAKER PLATE (Breaker Plate Cleaning)	106	07/20/1992	Monitor visible emission not to exceed 5% opacity in any five minute period and records of emissions activity not to exceed the exemption limitations.
Refrigeration Systems	103	03/15/1985	Maintain records of activity
Air Conditioning and Ventilation Systems	106.103	09/04/2000	Recordkeeping requirements as per 106.8 to demonstrate compliance with PBR claimed
Laboratory Equipment	106.122	09/04/2000	Recordkeeping requirements as per 106.8 to demonstrate compliance with PBR claimed

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
7/25/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
HEAT 1-A-M HEAT 1-N HEAT 1-O HEAT 2-A HEAT 2-B HEAT 3 HEAT 4-11 HEAT BLDG-1	106.183	09/04/2000	Recordkeeping requirements as per 106.8 to demonstrate compliance with PBR claimed
ANNEAL01	106.183	09/04/2000	Recordkeeping requirements as per 106.8 to demonstrate compliance with PBR claimed
Hand Held Manually Operated Machines	106.265	09/04/2000	Recordkeeping to demonstrate compliance with PBR claimed
Vaccum Cleaning System	106.266	09/04/2000	Recordkeeping to demonstrate compliance with PBR claimed
Wire Drawing (AD-01-16; AD-02-16)	106.317	09/04/2000	Recordkeeping requirements as per 106.8 to demonstrate compliance with PBR claimed
Rubber and Plastic Curing Process	106.391	09/04/2000	Recordkeeping requirements as per 106.8 to demonstrate compliance with PBR claimed

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
7/25/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
Enclosed Abrasive Cleaning	106.452	09/04/2000	Records of operating hours, material usage and other recordkeeping as per 106.8 to demonstrate compliance with PBR claimed.
BLDG-4 (Cold Solvent Cleaners & Degreasing)	106.454	11/01/2001	Records of solvents usage on monthly basis and compliance with 106.8.
EMGCYGEN	106.511	09/4/2000	Annual hours not to exceed 10% of the normal operating schedule and compliance with PBR and other applicable regulations.
1003	106.261	11/01/2003	Visible emissions and recordkeeping as per 106.8 to demonstrate compliance.
1008	106.261	11/01/2003	Visible emissions and recordkeeping as per 106.8 to demonstrate compliance.

From: Arthi Reddy <Arthi.Reddy@c-ka.com>
Sent: Wednesday, June 18, 2025 11:14 AM
To: Jasmine Yuan
Cc: Gordon Moore
Subject: RE: Technical Review - O2426 Prysmian Cables and Systems USA, LLC (Renewal, 37080)

Hi Jasmine:

Hope you are doing well. I wanted to follow-up with you regarding the status of the project. FYI- The NSR Permit for the facility was issued last month. Also, we didn't have any comments on the 2nd draft. Please let me know if you have any updates regarding the project and if anything, else is needed from us at this time.

Thanks
Arthi

From: Arthi Reddy
Sent: Wednesday, May 28, 2025 3:24 PM
To: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>
Cc: Gordon Moore <gordon.moore@c-ka.com>; Joe.Russ@prysmian.com
Subject: RE: Technical Review - O2426 Prysmian Cables and Systems USA, LLC (Renewal, 37080)

Hi Jasmine:

Please see the response. I have attached the updated forms OP-PBRSUP and Op_REQ1 Page 88. Everything else, I have addressed and complied below highlighted in red the list of additional information as per your emails. We are actively reviewing the 2nd draft and will respond before the due date of 6/6/2025 based on the comments received from our clients. I will be out of office starting tomorrow and return on June 3rd 2025. If you have any questions or need any additional information, please contact Mr. Gordon Moore, my manager at Gordon.moore@c-ka.com or 318 218 7651.

Did you answer my questions? I don't see updated op-pbrsup attached.
106.103 is removing or keep? Yes, please see the revised OP-PBRSUP form.
In addition, your email 01/31 says AF-01-16 is removed because all emissions are covered by OP-REQ2. But I don't see the unit AF-01-16 in your 01/31/2025 op-req2. Is this unit being separated into small emission points and covered under other emission IDs? **Yes, the unit is being separated into individual emission points and covered under other emissions ID as addressed in the NSR 177396. These are referenced under the OP-REQ2 . OP-REQ3 and OP-SUMR as applicable.**

Meanwhile, I have a few questions.

1. After talking to my coworker, I think it is better to keep 60-4 in ARS table and PM table. The term and ARS can exist at same time. **We are OK with this.**

2. SOP Term No. 8 references OP-PBR SUP dated January 31, 2025. However, you have sent me a partial table with date 04/10.

Can you send me a **complete** OP-PBR SUP with **same date** on all tables? I can change term No.8's reference date. Also, you need to send me in real PDF as second pic, not this scanned version as first pic. **Please see attached the updated OP-PBR SUP to reflect the last update date. When submitting the updates, we only included the revised pages with the update date to avoid confusion and redundancy for information that did not change.**

1. Moreover, OP-REQ1 you have 106.103 (SOP draft page22). But 106.103 is not in OP-PBR SUP. If 106.103 is still valid, you need to add it to OP-PBR SUP. I see our website 106.103 effective date is 09/01/1999, but you have 09/04/1999. **We are keeping the 106.103 as is. Please see the attached the latest version of OP-PBR SUP and OP-REQ1 Page 88 Section 1 to reflect the updated information.**

Thanks

Arthi

From: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>

Sent: Wednesday, May 28, 2025 12:46 PM

To: Arthi Reddy <Arthi.Reddy@c-ka.com>

Cc: Gordon Moore <gordon.moore@c-ka.com>; Joe.Russ@prysmian.com

Subject: RE: Technical Review - 02426 Prysmian Cables and Systems USA, LLC (Renewal, 37080)

Did you answer my questions? I don't see updated op-pbrsup attached.

106.103 is removing or keep? Yes, please see the revised OP-PBR SUP form.

In addition, your email 01/31 says AF-01-16 is removed because all emissions are covered by OP-REQ2. But I don't see the unit AF-01-16 in your 01/31/2025 op-req2. Is this unit being separated into small emission points and covered under other emission IDs? **Yes, the unit is being separated into individual emission points and covered under other emissions ID as addressed in the NSR 177396. These are referenced under the OP-REQ2 . OP-REQ3 and OP-SUMR as applicable.**

I need clarification or details because I have to address it in the SOB and Technical Summary. What you provided is not quite make sense to me.

XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)

I. Permits by Rule (30 TAC Chapter 106) for the Application Area

A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.

Please refer to the Attachment OP-REQ1-Page88-I

PBR No.:	008	Version No./Date:	05/8/1972
PBR No.:	034	Version No./Date:	07/20/1992
PBR No.:	036	Version No./Date:	03/15/1985
PBR No.:	039	Version No./Date:	03/15/1985
PBR No.:	059	Version No./Date:	05/08/1972
PBR No.:	070	Version No./Date:	03/15/1985
PBR No.:	083	Version No./Date:	03/15/1985
PBR No.:	089	Version No./Date:	09/23/1982
PBR No.:	106	Version No./Date:	07/20/1992
PBR No.:	103	Version No./Date:	03/15/1985
PBR No.:	102	Version No./Date:	7/20/1992
PBR No.:	106.103	Version No./Date:	09/01/2000
PBR No.:	106.122	Version No./Date:	09/04/2000
PBR No.:	106.183	Version No./Date:	09/04/2000
PBR No.:	106.183	Version No./Date:	09/04/2001
PBR No.:	106.227	Version No./Date:	09/04/2000
PBR No.:	106.265	Version No./Date:	09/04/2000
PBR No.:	106.266	Version No./Date:	09/04/2000
PBR No.:	106.317	Version No./Date:	09/04/2000
PBR No.:	106.391	Version No./Date:	09/04/2000
PBR No.:	106.433	Version No./Date:	09/04/2000
PBR No.:	106.452	Version No./Date:	09/04/2000
PBR No.:	106.454	Version No./Date:	11/1/2001
PBR No.:	106.511	Version No./Date:	09/04/2000
PBR No.:	106.262	Version No./Date:	11/1/2003
PBR No.:	106.261	Version No./Date:	11/1/2003
PBR No.:	106.261	Version No./Date:	11/1/2003
PBR No.:	106.261	Version No./Date:	11/1/2003
PBR No.:	106.261	Version No./Date:	11/1/2003

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
4/10/2025	O-2426	RN100236017

Unit ID No.	Registration No.	PBR No.	Registration Date
CABLE MANUFACT (Wire Drawer #7)	82175	106.262	6/29/2007
Pellet Receiving and Storage (Fabric Filter)	74613	106.261	2/9/2005
CL-01-16	140882	106.433	7/15/2016
SILO 90-1	78077	106.261	3/1/2006

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
4/10/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date
Wire Pre Heater	008	05/08/1972
Laboratory Equipment	034	07/20/1992
Wire Drawing	036	03/15/1985
Shop Welding	039	03/15/1985
1012 (Used Oil Tank)	059	05/08/1972
1013 (Used Oil Tank)	059	05/08/1972
1014 (Lube Bin 1)	059	05/08/1972
1016 (Lube Bin 3)	059	05/08/1972
1017 (Lube Bin 4)	059	05/08/1972
Shop Welding	070	03/15/1985
Propane Storage	083	03/15/1985
BLDG-2 (Cable Labeling)	089	09/23/1982
BREAKER PLATE (Breaker Plate Cleaning)	106	07/20/1992
Refrigeration Systems	103	03/15/1985

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
4/10/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date
Abrasive Cleaning Operations	102	7/20/1992
Air Conditioning and Ventilation Systems	106.103	9/01/1999
Laboratory Equipment	106.122	09/04/2000
HEAT 1-A-M	106.183	09/04/2000
HEAT 1-N	106.183	09/04/2000
HEAT 1-O	106.183	09/04/2000
HEAT 2-A	106.183	09/04/2000
HEAT 2-B	106.183	09/04/2000
HEAT 3	106.183	09/04/2000
HEAT 4-11	106.183	09/04/2000
HEAT BLDG-1	106.183	09/04/2000
ANNEAL01	106.183	09/04/2000

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
4/10/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date
Shop Welding	106.227	09/04/2000
Hand Held Manually Operated Machines	106.265	09/04/2000
Vaccum Cleaning System	106.266	09/04/2000
Wire Drawing (AD-01-16; AD-02-16)	106.317	09/04/2000
Rubber and Plastic Curing Process	106.391	09/04/2000
Enclosed Abrasive Cleaning	106.452	09/04/2000
BLDG-4 (Cold Solvent Cleaners & Degreasing)	106.454	11/01/2001
EMGCYGEN	106.511	09/4/2000
1003 (Pellet Storage Silo)	106.261	11/01/2003
1008 (Test Bin)	106.261	11/01/2003

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

Date	Permit Number	Regulated Entity Number
4/10/2025	O-2426	RN100236017

PBR No.	Version No./Date

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

Date	Permit Number	Regulated Entity Number
4/10/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
CABLE MANUFACT (Wire Drawer #7)	106.262	82175	Compliance demonstration with 106.8 and 106.4 for any consecutive 12 month period by maintaining records regarding the quantity of air contaminants emitted by the facility.
Pellet Receiving and Storage (Fabric Filter)	106.261	74613	Visible emissions, except uncombined water, to the atmosphere from any point or fugitive source shall not exceed 5.0% opacity in any six-minute period using Method 9. Compliance with 106.4 and 106.8.
CL-01-16	106.433	140882	Visible emissions, except uncombined water, to the atmosphere from any point or fugitive source shall not exceed 5.0% opacity in any six-minute period using Method 9. Data of daily coatings and solvent use and the actual hours of operation of each coating or stripping operation; A monthly report that represents actual hours of operation each day, and emissions from each operation in terms of pounds per hour; pound per day; pounds per week and tons emitted from the site during the previous 12 months. Records as per 106.8.
SILO 90-1	106.261	78077	Visible emissions, except uncombined water, to the atmosphere from any point or fugitive source shall not exceed 5.0% opacity in any six-minute period using Method 9. Compliance with 106.4 and 106.8

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
4/10/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
Wire Pre Heater	008	05/08/1972	Monitor fuel consumption rate.
Laboratory Equipment	034	07/20/1992	Maintain equipment records used for chemical and physical analyses
Wire Drawing	036	03/15/1985	Maintain equipment records.
Shop Welding	039	03/15/1985	Maintain equipment operating hours and material usage records.
1012 (Used Oil Tank)	059	05/08/1972	Maintain records of tank throuput.
1013 (Used Oil Tank)	059	05/08/1972	Maintain records of tank throuput.
1014 (Lube Bin 1)	059	05/08/1972	Maintain records of tank throuput.
1016 (Lube Bin 3)	059	05/08/1972	Maintain records of tank throuput.
1017 (Lube Bin 4)	059	05/08/1972	Maintain records of tank throuput.

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
4/10/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
Shop Welding	070	03/15/1985	Maintain equipment operating hours and material usage records.
Propane Storage	083	03/15/1985	Maintain records of tank throughput
BLDG-2 (Cable Labeling)	089	09/23/1982	Maintain records of operating hours and surface coatings usage
BREAKER PLATE (Breaker Plate Cleaning)	106	07/20/1992	Monitor visible emission not to exceed 5% opacity in any five minute period and records of emissions activity not to exceed the exemption limitations.
Refrigeration Systems	103	03/15/1985	Maintain records of activity
Air Conditioning and Ventilation Systems	106.103	09/01/1999	Recordkeeping requirements as per 106.8 to demonstrate compliance with PBR claimed
Laboratory Equipment	106.122	09/04/2000	Recordkeeping requirements as per 106.8 to demonstrate compliance with PBR claimed

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
4/10/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
HEAT 1-A-M HEAT 1-N HEAT 1-O HEAT 2-A HEAT 2-B HEAT 3 HEAT 4-11 HEAT BLDG-1	106.183	09/04/2000	Recordkeeping requirements as per 106.8 to demonstrate compliance with PBR claimed
ANNEAL01	106.183	09/04/2000	Recordkeeping requirements as per 106.8 to demonstrate compliance with PBR claimed
Hand Held Manually Operated Machines	106.265	09/04/2000	Recordkeeping to demonstrate compliance with PBR claimed
Vaccum Cleaning System	106.266	09/04/2000	Recordkeeping to demonstrate compliance with PBR claimed
Wire Drawing (AD-01-16; AD-02-16)	106.317	09/04/2000	Recordkeeping requirements as per 106.8 to demonstrate compliance with PBR claimed
Rubber and Plastic Curing Process	106.391	09/04/2000	Recordkeeping requirements as per 106.8 to demonstrate compliance with PBR claimed

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
4/10/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
Enclosed Abrasive Cleaning	106.452	09/04/2000	Records of operating hours, material usage and other recordkeeping as per 106.8 to demonstrate compliance with PBR claimed.
BLDG-4 (Cold Solvent Cleaners & Degreasing)	106.454	11/01/2001	Records of solvents usage on monthly basis and compliance with 106.8.
EMGCYGEN	106.511	09/4/2000	Annual hours not to exceed 10% of the normal operating schedule and compliance with PBR and other applicable regulations.
1003	106.261	11/01/2003	Visible emissions and recordkeeping as per 106.8 to demonstrate compliance.
1008	106.261	11/01/2003	Visible emissions and recordkeeping as per 106.8 to demonstrate compliance.

From: Arthi Reddy <Arthi.Reddy@c-ka.com>

However, I looked into your OP-REQ2, OP-REQ2 does not include this unit AF-01-16 for MACT FFFF permit shield.

Do you want to add this unit on OP-REQ2 for permit shield MACT FFFF? If so, please submit updated OP-REQ2 to include this unit (along with OP-ACPS updates).

The compliance unit AF-01-16 was deleted and the sources covered under this emission point are being re-permitted under the pending NSR and Title V SOP permits currently under TCEQ Review.

The re-permitted sources are listed individually for MACT FFFF permit shield under the OP-REQ2 form. The deletion of AF-01-16 and corresponding regulatory requirement were addressed in the OP-SUMR and OP-REQ3 forms. We would like to proceed with the same arrangement for these sources as shown in our latest submittal of the forms.

With regards to the OP-ACPS, we are including a new OP-ACPS form re-dated (1/31/2025) to show all the units are in compliance as any non-compliance issues will be resolved when the pending NSR and Title are issued, and no further action is needed.

Sent: Wednesday, May 28, 2025 12:07 PM

To: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>

Subject: RE: Technical Review - O2426 Prysmian Cables and Systems USA, LLC (Renewal, 37080)

Hi Jasmine:

Please see below. Please let me know if you have any issues. Thanks

PRYSMIAN CABLES AND SYSTEMS USA, LLC

Texas Taxpayer Number:

15710615111

From: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>

Sent: Wednesday, May 28, 2025 11:58 AM

To: Arthi Reddy <Arthi.Reddy@c-ka.com>

Cc: Gordon Moore <gordon.moore@c-ka.com>; Joe.Russ@prysmian.com

Subject: RE: Technical Review - O2426 Prysmian Cables and Systems USA, LLC (Renewal, 37080)

Can you please send me your TAX ID as I got this error in the system?

PROJECT NUMBER 37080 LEAD NAME PRYSMIAN CABLES AND SYSTEMS USA, LLC

Consistency Check Review

File Window Help

Project 37080

Emission Unit *ALL*

umber	Name	Value
	COMPANY STATE FRANCHISE TAX ID LENGTH MUST BE 11	703635623

From: Jasmine Yuan

Sent: Wednesday, May 28, 2025 11:32 AM

To: Arthi Reddy <Arthi.Reddy@c-ka.com>

Cc: Gordon Moore <gordon.moore@c-ka.com>; Joe.Russ@prysmian.com

Subject: RE: Technical Review - 02426 Prysmian Cables and Systems USA, LLC (Renewal, 37080)

Hello Arthi,

The updated WDP is attached for you to review. Please provide your comments by 06/06.

After that, I will send PNAP package to QAQC review and management review. Hope we can send the PNAP out in the middle of June.

Meanwhile, I have a few questions.

1. After talking to my coworker, I think it is better to keep 60-4 in ARS table and PM table. The term and ARS can exist at same time. **We are OK with this.**
2. SOP Term No. 8 references OP-PBR SUP dated January 31, 2025. However, you have sent me a partial table with date 04/10.

Can you send me **a complete** OP-PBR SUP with **same date** on all tables? I can change term No.8's reference date. Also, you need to send me in real PDF as second pic, not this scanned version as first pic. **Please see attached the updated OP-PBR SUP to reflect the last update date. When submitting the updates, we only included the revised pages with the update date to avoid confusion and redundancy for information that did not change.**

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
4/10/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date
Abrasive Cleaning Operations (Added)	102	7/20/1992
Laboratory Equipment	106.122	09/04/2000
HEAT 1-A-M ✓	106.183	09/04/2000
HEAT 1-N ✓	106.183	09/04/2000
HEAT 1-O ✓	106.183	09/04/2000
HEAT 2-A ✓	106.183	09/04/2000
HEAT 2-B ✓	106.183	09/04/2000
HEAT 3 ✓	106.183	09/04/2000
HEAT 4-11 ✓	106.183	09/04/2000
HEAT BLDG-1 ✓	106.183	09/04/2000
ANNEAL01 ✓	106.183	09/04/2000

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
1/31/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./I
Shop Welding	106.227	09/04/2000
Hand Held Manually Operated Machines	106.265	09/04/2000
Vacuum Cleaning System	106.266	09/04/2000
Wire Drawing (AD-01-16; AD-02-16)	106.317	09/04/2000
Rubber and Plastic Curing Process	106.391	09/04/2000
Enclosed Abrasive Cleaning	106.452	09/04/2000
BLDG-4 (Cold Solvent Cleaners & Degreasing)	106.454	11/01/2001
EMGCYGEN	106.511	09/4/2000
1003 (Pellet Storage Silo)	106.261	11/01/2003
1008 (Test Bin)	106.261	11/01/2003

- Moreover, OP-REQ1 you have 106.103 (SOP draft page22). But 106.103 is not in OP-PBRSUP. If 106.103 is still valid, you need to add it to OP-PBRSUP. I see our website 106.103 effective date is 09/01/1999, but you have 09/04/1999. **We are keeping the 106.103 as is. Please see the attached the latest version of OP-PBRSUP and OP-REQ1 Page 88 Section 1 to reflect the updated information.**

Outdated Exemption List, Subchapter C - September 1, 1999

Synopsis of specific exemptions from air permitting that were in effect on this date.

30 TAC 106 - Subchapter C Domestic and Comfort Heating and Cooling

106.101 Domestic Use Facilities (Previously SE 1)

106.102 Comfort Heating (Previously SE 3)

106.103 Air Conditioning and Ventilation Systems (Previously SE 4)

106.101 Domestic Use Facilities (Previously SE 1)

Any facility constructed and operated at a domestic residence for domestic use is exempt.

106.102 Comfort Heating (Previously SE 3)

This section exempts combustion units designed and used exclusively for comfort heating purposes employing liquid

Thanks,
Jasmine

From: Arthi Reddy <Arthi.Reddy@c-ka.com>

Sent: Thursday, April 24, 2025 11:00 AM

To: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>

Cc: Gordon Moore <gordon.moore@c-ka.com>; Joe.Russ@prysmian.com

Subject: FW: Technical Review - O2426 Prysmian Cables and Systems USA, LLC (Renewal, 37080)

FYI- Jasmine, I sent you the email below as a follow up to your email on April 15, 2025.
Please see below for my latest responses in blue.

From: Arthi Reddy

Sent: Tuesday, April 15, 2025 2:41 PM

To: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>

Cc: Gordon Moore <gordon.moore@c-ka.com>; Scassiotti Marina (EXT)

<marina.scassiotti.ex@prysmian.com>; Wright Aaron (B2B) <aaron.wright@encorewire.com>

Subject: RE: Technical Review - O2426 Prysmian Cables and Systems USA, LLC (Renewal, 37080)

Hi Jasmine:

Please see my comments below in blue.

Thanks
Arthi

From: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>
Sent: Tuesday, April 15, 2025 10:39 AM
To: Arthi Reddy <Arthi.Reddy@c-ka.com>
Cc: Gordon Moore <gordon.moore@c-ka.com>; Scassiotti Marina (EXT) <marina.scassiotti.ex@prysmian.com>; Wright Aaron (B2B) <aaron.wright@encorewire.com>
Subject: RE: Technical Review - O2426 Prysmian Cables and Systems USA, LLC (Renewal, 37080)

Arthi,

Regarding the permit draft comments,

1, Term 111(a)(1)(B) will be added to the permit. [I am OK with that change.](#)

2, I can remove unit 60-4 from ARS table. Because the unit only has 111 requirement, the unit won't appear in the permit anymore once I remove it from ARS table by deleting it on UA15. Is that okay? Please confirm. [I am OK with that change.](#)

3, You requested to add emissions points per the 177396. Title V and NSR are 2 different permit system and they could overlap for some units, but not all. We only include the units with requirements or permit shield in Title V permit to void public/EPA comments/confusion. If we receive comments regarding PBRs, we will add units in the permit to Response To Comments in the proposed permit draft. In other words, not all units in NSR need to go to Title V. If you want to document them, you can submit OP-SUMR to include them (The form column can be OP-SUMR, rather than UA form or OP-REQ2) as your application is part of permit. So please cross check your units list. I have over 30 permits to work on and really don't have time to work for your NSR emission list. We reply on your thorough and accurate application to process the review quickly and efficiently. If you think some units on 177396 have requirements or permit shields, you need to submit OP-SUMR, UA form, OP-REQ2 to include the units in the Title V permit. [I cross-checked again with the OP-SUMR and our MAERT NSR Table. All the emissions sources are referenced in the Emissions Unit table in the SOP draft permit looks good and as long as the other sources covered by PBRs or SE are referenced elsewhere in the permit and as per your statement below that not all sources are required to be in the emission unit table, we are OK with the Emission Unit Table. No further comments.](#)

4, For OP-PBRSUP, you may want to wait for 177398 issuance and revise the form by redating the form (submit as a set), removing all incorporated PBRs (106.371), exemptions (if there are). PBRSUP, OP-SUMR, and OP-REQ1 PBR list should be match each other. Please go over the form instruction and revise the form carefully.

In addition, [see my response below in red to your](#) question. [Please refer to the OP-SUMR form submitted on 10/29/2024. We addressed the removal of the incorporated PBRs and SE in the OP-SUMR as we were working parallely on the NSR Draft Permit review at the time. Specifically, please refer to the Unit/Process Revisions #7 \(111492\); #8 \(PBR 111493\); and #60 \(106.371\) where we requested the deletion of the PBR/SE and listed it as pending under NSR. We matched up everything with the OP-REQ1 PBR list submitted on 1/16/2025. The only thing that was missing in the draft permit was the SE 102 in the New Source authorization reference also referenced in the current permit which we want to retain. Please let me know if we still need to re-do these forms with the issuance of NSR as this has already been addressed previously as stated above.](#)

Jasmine

From: Arthi Reddy <Arthi.Reddy@c-ka.com>
Sent: Monday, April 14, 2025 4:11 PM
To: Jasmine Yuan
Cc: Gordon Moore; Scassiotti Marina (EXT); Wright Aaron (B2B)
Subject: RE: Technical Review - O2426 Prysmian Cables and Systems USA, LLC (Renewal, 37080)
Attachments: SOP - O2426 Prysmian Cables and Systems USA LLC (Renewal 37080) Draft (002)- CK Comment 4102025.docx; Additional Information Title V-O2426.pdf; OPPBR SUP.pdf; NSR Draft MRT 177396.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Jasmine:

Please see attached a PDF of the Draft Permit with our comments. We are good with the draft condition for general, and specific permit conditions as they similar to what we have in the current permit. For consistency and as per your recommendation, I have attached a revised OP-REQ Q.I.A.4 to answer YES and include the general 30 TAC Chapter 111 permit terms to add 3A . Also, I compared the New Source Authorization Reference Table to the current Permit. There is one SE 102 that is not listed and few permit authorization that have been consolidated with the pending NSR. I have included a revised PBR Supplemental page to add SE 102. Please refer to my comments on Draft Page 20 for additional details.

Also, Draft Page 23 is missing emission points as per our NSR Permit MRT Table. I have attached a copy of the draft MRT Table. Please can you make sure all the NSR sources are referenced in the New Source Review Authorization References by Emissions Unit. I also noticed that some of the PBRs and other emissions units from the OPPBR SUP list is missing in these table. I have marked up those sources and included in the attachment OPPBR SUP. Please can you make sure if these sources are supposed to be listed in the Reference by Emission Unit as well.

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

Thanks
Arthi

From: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>
Sent: Friday, March 28, 2025 9:38 PM
To: Arthi Reddy <Arthi.Reddy@c-ka.com>
Cc: Gordon Moore <gordon.moore@c-ka.com>; Garner Wendy <wendy.garner@prysmian.com>; Scassiotti Marina (EXT) <marina.scassiotti.ex@prysmian.com>
Subject: RE: Technical Review - O2426 Prysmian Cables and Systems USA, LLC (Renewal, 37080)

- E. Emission units subject to 40 CFR Part 63, Subpart DDDDD as identified in the attached Applicable Requirements Summary table are subject to 30 TAC Chapter 113, Subchapter C, § 113.1130, which incorporates the 40 CFR Part 63 Subpart by reference.
2. The permit holder shall comply with the following sections of 30 TAC Chapter 101 (General Air Quality Rules):
- A. Title 30 TAC § 101.1 (relating to Definitions), insofar as the terms defined in this section are used to define the terms used in other applicable requirements
- B. Title 30 TAC § 101.3 (relating to Circumvention)
- C. Title 30 TAC § 101.8 (relating to Sampling), if such action has been requested by the TCEQ
- D. Title 30 TAC § 101.9 (relating to Sampling Ports), if such action has been requested by the TCEQ
- E. Title 30 TAC § 101.10 (relating to Emissions Inventory Requirements)
- F. Title 30 TAC § 101.201 (relating to Emission Event Reporting and Recordkeeping Requirements)
- G. Title 30 TAC § 101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Recordkeeping Requirements)
- H. Title 30 TAC § 101.221 (relating to Operational Requirements)
- I. Title 30 TAC § 101.222 (relating to Demonstrations)
- J. Title 30 TAC § 101.223 (relating to Actions to Reduce Excessive Emissions)
3. Permit holder shall comply with the following requirements of 30 TAC Chapter 111:
- A. For visible emissions from a building, enclosed facility, or other structure; the permit holder shall comply with the following requirements:
- (i) Title 30 TAC § 111.111(a)(7)(A) (relating to Requirements for Specified Sources)
- (ii) Title 30 TAC § 111.111(a)(7)(B)(i) or (ii)
- (iii) For a building containing an air emission source, enclosed facility, or other structure containing or associated with an air emission source subject to 30 TAC § 111.111(a)(7)(A), complying with 30 TAC § 111.111(a)(7)(B)(i) or (ii), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO_x, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146:
- (1) An observation of visible emissions from a building containing an air emission source, enclosed facility, or other structure containing or associated with an air emission source which is required to comply with 30 TAC § 111.111(a)(7)(A) shall be conducted at least once during each calendar quarter unless the air emission source or enclosed facility is not operating for the entire quarter.

Commented [AR1]: Please insert condition 3A from old permit with the submittal of revised OP-REQ 1 .A.4

Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
60-4	EMISSION POINTS/STATIONARY VENTS/PROCESS VENTS	N/A	111-604SILO	30 TAC Chapter 111, Visible Emissions	No changing attributes.
ANNEAL01	PROCESS HEATERS/FURNACES	N/A	63DDDDD-01	40 CFR Part 63, Subpart DDDDD	No changing attributes.
CL-01-16	SURFACE COATING OPERATIONS	N/A	60RR-01	40 CFR Part 60, Subpart RR	No changing attributes.
EMGCYGEN	SRIC ENGINES	N/A	R117-01	30 TAC Chapter 117, East Texas Combustion	No changing attributes.
EMGCYGEN	SRIC ENGINES	N/A	60JJJJ-01	40 CFR Part 60, Subpart JJJJ	No changing attributes.

Commented [AR2]: Will this be removed with the revised
submittal of Op-REQ1 Question 1.A.4

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
60-4	EP	111-604SILO	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(1)(B) § 111.111(a)(1)(E)	Visible emissions from any stationary vent shall not exceed an opacity of 20% averaged over a six minute period for any source on which construction was begun after January 31, 1972.	[G]§ 111.111(a)(1)(F) ** See Periodic Monitoring Summary	None	None
ANNEAL01	EU	63DDDDD-01	112(B) HAPS	40 CFR Part 63, Subpart DDDDD	§ 63.7500(a)(1)-Table 3.1 § 63.7500(a)(1) § 63.7500(a)(3) § 63.7500(e) § 63.7505(a) § 63.7540(a) [G]§ 63.7540(a)(10) § 63.7540(a)(12) § 63.7540(a)(13)	For a new or existing boiler or process heater with a heat input capacity of less than or equal to 5 million Btu per hour designed to burn gas 1, a tune-up of the boiler or process heater must be conducted every 5 years as specified in § 63.7540.	§ 63.7515(d) [G]§ 63.7521(f) [G]§ 63.7521(g) § 63.7521(h) § 63.7521(i) § 63.7530(g) § 63.7540(a) [G]§ 63.7540(a)(10) [G]§ 63.7540(c)	§ 63.7555(a) § 63.7555(a)(1) § 63.7555(a)(2) § 63.7555(g) § 63.7555(h) § 63.7560(a) § 63.7560(b) § 63.7560(c)	[G]§ 63.7521(g) § 63.7530(e) § 63.7530(f) § 63.7545(a) § 63.7545(b) § 63.7545(c) [G]§ 63.7545(e) [G]§ 63.7545(f) § 63.7550(a) [G]§ 63.7550(b) [G]§ 63.7550(c) [G]§ 63.7550(h)
CL-01-16	PRO	60RR-01	VOC	40 CFR Part 60, Subpart RR	§ 60.440(b)	Facilities inputting to the coating process 45 Mg or less of VOC/12 month period are not subject to §60.442(a), however, if the VOC input exceeds 45 Mg/12 month period, §60.442(a) applies.	§ 60.445(d) § 60.445(h)	§ 60.445(d) § 60.445(h)	None
EMGCYGEN	EU	R117-01	Exempt	30 TAC Chapter 117, East Texas Combustion	§ 117.3303(5)	Stationary engines operated exclusively in emergency situations are exempt from this division, except as specified in § 117.3345(b). Operation for maintenance or testing up to 100 hours per year is permitted.	None	§ 117.3345(b)	None
EMGCYGE	EU	60JJJJ-01	CO	40 CFR Part 60,	§ 60.4233(e)-Table	Owners and operators of	§ 60.4237(b)	§ 60.4243(a)(1)	[G]§ 60.4245(e)

Commented [AR3]: Remove this condition and insert generic condition 3.A. as in the old permit common for stationary vents.

New Source Review Authorization References

The New Source Review authorizations listed in the table below are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 111492	Issuance Date: 06/09/1995
Authorization No.: 111493	Issuance Date: 03/30/1994
Authorization No.: 177396	Issuance Date:
Authorization No.: 12209	Issuance Date: 01/07/1981
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 8	Version No./Date: 05/08/1972
Number: 34	Version No./Date: 07/20/1992
Number: 36	Version No./Date: 03/15/1985
Number: 39	Version No./Date: 03/15/1985
Number: 59	Version No./Date: 05/08/1972
Number: 70	Version No./Date: 03/15/1985
Number: 83	Version No./Date: 03/15/1985
Number: 89	Version No./Date: 09/23/1982
Number: 103	Version No./Date: 03/15/1985
Number: 106	Version No./Date: 07/20/1992
Number: 106.103	Version No./Date: 09/04/2000
Number: 106.122	Version No./Date: 09/04/2000
Number: 106.183	Version No./Date: 09/04/2000
Number: 106.227	Version No./Date: 09/04/2000
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.262	Version No./Date: 11/01/2003
Number: 106.265	Version No./Date: 09/04/2000
Number: 106.266	Version No./Date: 09/04/2000
Number: 106.317	Version No./Date: 09/04/2000
Number: 106.371	Version No./Date: 09/04/2000
Number: 106.391	Version No./Date: 09/04/2000
Number: 106.433	Version No./Date: 09/04/2000
Number: 106.452	Version No./Date: 09/04/2000
Number: 106.454	Version No./Date: 11/01/2001
Number: 106.511	Version No./Date: 09/04/2000

Commented [AR4]: Consolidated in NSR 177396 (pending)

Commented [AR5]: Has been consolidated in NSR 177396

Commented [AR6]: Add Exemption 102 as the last permit .
SE # 102 Version 7/20/1992

Commented [AR7]: Consolidated in NSR 177396

New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Commented [AR8]: Emissions point are missing as per the 177396. Provided the MRT Table (pending issuance) please match the emissions unit with the MRT table

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
1003	PELLET STORAGE SILO	106.261/11/01/2003
1008	TEST BIN	106.261/11/01/2003
1012	VERTICAL USED OIL TANK	59/05/08/1972
1013	HORIZONTAL USED OIL TANK	59/05/08/1972
1014	LUBE BIN 1-LUBRICATING OIL TANK	59/05/08/1972
1016	LUBE BIN 3-LUBRICATING OIL TANK	59/05/08/1972
1017	LUBE BIN 4-LUBRICATING OIL TANK	59/05/08/1972
60-4	SILO 60-4 DUST COLLECTION SYSTEM	177396
ANNEAL01	COMBUSTION	106.183/09/04/2000
BLDG-4	DEGREASING	106.454/11/01/2001
BLG1-CV61	INDOOR BUILDING 1 CV LINES FUGITIVE EMISSIONS	177396
BLG1-CV62	INDOOR BUILDING 1 CV LINES FUGITIVE EMISSIONS	177396
BLG1-CV63	INDOOR BUILDING 1 CV LINES FUGITIVE EMISSIONS	177396
BLG1-J54	INDOOR BUILDING 1 JACKETING LINES FUGITIVE EMISSIONS	177396
BLG1-J55	INDOOR BUILDING 1 JACKETING LINES FUGITIVE EMISSIONS	177396
BLG1-J56	INDOOR BUILDING 1 JACKETING LINES FUGITIVE EMISSIONS	177396
BLG1-M64	INDOOR BUILDING 1 MONOSIL FUGITIVE EMISSIONS	177396
BLG1-M65	INDOOR BUILDING 1 MONOSIL FUGITIVE EMISSIONS	177396
BLG2-CV66	INDOOR BUILDING 2 CV LINES FUGITIVE EMISSIONS	177396
BLG2-CV67	INDOOR BUILDING 2 CV LINES FUGITIVE EMISSIONS	177396
BLG2-CV68	INDOOR BUILDING 2 CV LINES FUGITIVE EMISSIONS	177396

New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Commented [AR8]: Emissions point are missing as per the 177396. Provided the MRT Table (pending issuance) please match the emissions unit with the MRT table

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
BLG2-CV69	INDOOR BUILDING 2 CV LINES FUGITIVE EMISSIONS	177396
BLG2-J53	INDOOR BUILDING 2 JACKETING LINES FUGITIVE EMISSIONS	177396
BLG2-J57	INDOOR BUILDING 2 JACKETING LINES FUGITIVE EMISSIONS	177396
BREAK PLATE	BREAKER PLATE CLEANING	106/07/20/1992
CABLE MANUFACT	CABLE MANUFACTURING	106.261/11/01/2003, 106.262/11/01/2003 [82175]
CL-01-16	CABLE LABELING	106.433/09/04/2000 [140882]
CV1-61	CV DOGHOUSE VENT EMISSIONS	177396
CV1-62	CV DOGHOUSE VENT EMISSIONS	177396
CV1-63	CV DOGHOUSE VENT EMISSIONS	177396
CV2-66	CV DOGHOUSE VENT EMISSIONS	177396
CV2-67	CV DOGHOUSE VENT EMISSIONS	177396
CV2-68	CV DOGHOUSE VENT EMISSIONS	177396
CV2-69	CV DOGHOUSE VENT EMISSIONS	177396
CWT-1	COOLING TOWER EMISSIONS	177396
CWT-2	COOLING TOWER EMISSIONS	177396
EMGCYGEN	EMERGENCY GENERATOR	106.511/09/04/2000
FUG1-CV61	OUTDOOR BUILDING 1 CV LINES FUGITIVES	177396
FUG1-CV62	OUTDOOR BUILDING 1 CV LINES FUGITIVES	177396
FUG1-CV63	OUTDOOR BUILDING 1 CV LINES FUGITIVES	177396
FUG1-J54	OUTDOOR BUILDING 1 JACKETING LINES FUGITIVES	177396
FUG1-J55	OUTDOOR BUILDING 1 JACKETING LINES FUGITIVES	177396

New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Commented [AR8]: Emissions point are missing as per the 177396. Provided the MRT Table (pending issuance) please match the emissions unit with the MRT table

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
FUG1-J56	OUTDOOR BUILDING 1 JACKETING LINES FUGITIVES	177396
FUG1-M64	OUTDOOR BUILDING 1 MONOSIL FUGITIVE EMISSIONS	177396
FUG1-M65	OUTDOOR BUILDING 1 MONOSIL FUGITIVE EMISSIONS	177396
FUG2-CV66	OUTDOOR BUILDING 2 CV LINES FUGITIVES	177396
FUG2-CV67	OUTDOOR BUILDING 2 CV LINES FUGITIVES	177396
FUG2-CV68	OUTDOOR BUILDING 2 CV LINES FUGITIVES	177396
FUG2-CV69	OUTDOOR BUILDING 2 CV LINES FUGITIVES	177396
FUG2-J53	OUTDOOR BUILDING 2 JACKETING LINES FUGITIVES	177396
FUG2-J57	OUTDOOR BUILDING 2 JACKETING LINES FUGITIVES	177396
HEAT 1-A-M	HEATER	106.183/09/04/2000
HEAT 1-N	HEATER	106.183/09/04/2000
HEAT 1-O	HEATER	106.183/09/04/2000
HEAT 2-A	HEATER	106.183/09/04/2000
HEAT 2-B	HEATER	106.183/09/04/2000
HEAT 3	HEATER	106.183/09/04/2000
HEAT 4-11	HEATER	106.183/09/04/2000
HEAT BLDG-1	HEATER	106.183/09/04/2000
PWTCL	PROCESS WATER COOLING LOOP	177396
WWT-1	PROCESS WASTEWATER COOLING LOOP STORAGE TANK	177396
WWT-2	PROCESS WASTEWATER COOLING LOOP STORAGE TANK	177396
WWT-3	PROCESS WASTEWATER COOLING LOOP STORAGE TANK	177396

New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
WWT-4	PROCESS WASTEWATER COOLING LOOP STORAGE TANK	177396

**This column may include Permit by Rule (PBR) numbers and version dates, PBR Registration numbers in brackets, Standard Permit Registration numbers, Minor NSR permit numbers, and Major NSR permit numbers.

Commented [AR8]: Emissions point are missing as per the 177396. Provided the MRT Table (pending issuance) please match the emissions unit with the MRT 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
1/31/2025	O-2426	RN100236017

Unit ID No.	Registration No.	PBR No.	Registration Date
CABLE MANUFACT (Wire Drawer #7)	82175 ✓	106.262	6/29/2007
Pellet Receiving and Storage (Fabric Filter)	74613	106.261	2/9/2005
CL-01-16	140882 ✓	106.433	7/15/2016
SILO 90-1	78077	106.261	3/1/2006

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

*NSR Referenced
by List*

Date	Permit Number	Regulated Entity Number
1/31/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date
Wire Pre Heater	008	05/08/1972
Laboratory Equipment	034	07/20/1992
Wire Drawing	036	03/15/1985
Shop Welding	039	03/15/1985
1012 (Used Oil Tank) ✓	059	05/08/1972
1013 (Used Oil Tank) ✓	059	05/08/1972
1014 (Lube Bin 1) ✓	059	05/08/1972
1016 (Lube Bin 3) ✓	059	05/08/1972
1017 (Lube Bin 4) ✓	059	05/08/1972
Shop Welding	070	03/15/1985
Propane Storage	083	03/15/1985
BLDG-2 (Cable Labeling)	089	09/23/1982
BREAKER PLATE (Breaker Plate Cleaning)	106	07/20/1992
Refrigeration Systems	103	03/15/1985

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

Date	Permit Number	Regulated Entity Number
1/31/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date
Shop Welding	106.227	09/04/2000
Hand Held Manually Operated Machines	106.265	09/04/2000
Vaccum Cleaning System	106.266	09/04/2000
Wire Drawing (AD-01-16; AD-02-16)	106.317	09/04/2000
Rubber and Plastic Curing Process	106.391	09/04/2000
Enclosed Abrasive Cleaning	106.452	09/04/2000
BLDG-4 (Cold Solvent Cleaners & Degreasing)	106.454	11/01/2001
EMGCYGEN	106.511	09/4/2000
1003 (Pellet Storage Silo)	106.261	11/01/2003
1008 (Test Bin)	106.261	11/01/2003

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

Date	Permit Number	Regulated Entity Number
4/10/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date
Abrasive Cleaning Operations (Added)	102	7/20/1992
Laboratory Equipment	106.122	09/04/2000
HEAT 1-A-M ✓	106.183	09/04/2000
HEAT 1-N ✓	106.183	09/04/2000
HEAT 1-O ✓	106.183	09/04/2000
HEAT 2-A ✓	106.183	09/04/2000
HEAT 2-B ✓	106.183	09/04/2000
HEAT 3 ✓	106.183	09/04/2000
HEAT 4-11 ✓	106.183	09/04/2000
HEAT BLDG-1 ✓	106.183	09/04/2000
ANNEAL01 ✓	106.183	09/04/2000

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

Date:	Updated 4/9/2025
Permit No.:	O-2426
RN No.:	RN100236017

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date	Permit Number	Regulated Entity Number
4/10/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date
Abrasive Cleaning Operations	102	7/20/1992
Laboratory Equipment	106.122	09/04/2000
HEAT 1-A-M	106.183	09/04/2000
HEAT 1-N	106.183	09/04/2000
HEAT 1-O	106.183	09/04/2000
HEAT 2-A	106.183	09/04/2000
HEAT 2-B	106.183	09/04/2000
HEAT 3	106.183	09/04/2000
HEAT 4-11	106.183	09/04/2000
HEAT BLDG-1	106.183	09/04/2000
ANNEAL01	106.183	09/04/2000

From: Jasmine Yuan
Sent: Friday, March 28, 2025 9:38 PM
To: Arthi Reddy
Cc: Gordon Moore; Garner Wendy; Scassiotti Marina (EXT)
Subject: RE: Technical Review - O2426 Prysmian Cables and Systems USA, LLC (Renewal, 37080)
Attachments: SOP - O2426 Prysmian Cables and Systems USA, LLC (Renewal, 37080) Draft.docx

Hi Arthi,

I have conducted a technical review of *renewal* application for **Prysmian Cables and Systems USA, LLC, Prysmian Cables and Systems**. 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 note that the 30 TAC Chapter 111 term in your current permit term No.3A was deleted because your OP-REQ1 Question I.A. 4. answer is Yes. That means you don't want the term to cover the vents on site and you prefer to list all vents in the permit attachment ARS table, just like unit 60-4. This is not very common. So please confirm that is your intention. Otherwise, resend me the updated OP-REQ1 Page 1 and I will update the terms.

Second, the NSR 177396 is still pending. I will update the issuance date upon its issuance. Meanwhile, you can review the permit draft.

Third, please pay attention to the NSR tables and permit shield table in the permit and let me know if I overlooked any items.

Please review the WDP and submit to me any comments you have on the working draft permit by *Due 04/11/2025*.

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

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

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1.

Please notify me when these updates have been submitted.

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

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

Thank you for your cooperation.

Sincerely,
Jasmine Yuan

From: Arthi Reddy <Arthi.Reddy@c-ka.com>

Sent: Friday, January 31, 2025 3:27 PM

To: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>

Cc: Gordon Moore <gordon.moore@c-ka.com>; Garner Wendy <wendy.garner@prysmian.com>; Scassiotti Marina (EXT) <marina.scassiotti.ex@prysmian.com>

Subject: RE: Technical Review - O2426 Prysmian Cables and Systems USA, LLC (Renewal, 37080)

Hi Jasmine:

Please see the following responses (in red) to your request for additional review questions received on January 9, 2025, and then as a follow-up on January 24, 2025. Please review and let me know if you have any questions or need anything else.

1, All PBRs listed on OP-REQ1 page 87 should be on OP-PBRSUP. Read the form instructions carefully please.

Noted in the updated forms attached with this submittal.

2, On OP-PBRSUP Form dated 10/29/2024, PBR 106.227 and 106.452 should be on Table A, B, and D. From the OP-PBSUP instruction table, these PBRs need to go to table A,B,D, and they are not insignificant PBR.

PBRs 106.227 and 106.452 are addressed in Table B and D in the updated OP-PBRSUP form attached with this submittal.

2, PBR 106.261/09/04/2000; 106.262/11/01/2003, 106.472/09/04/2000 are not included in OP-REQ1 page 88. But they are in the OP-PBRSUP form. You need to either add them to OP-REQ1 or remove them from PBRSUP.

Noted and addressed in the updated forms attached with this submittal.

From: Arthi Reddy <Arthi.Reddy@c-ka.com>
Sent: Friday, January 31, 2025 3:27 PM
To: Jasmine Yuan
Cc: Gordon Moore; Garner Wendy; Scassiotti Marina (EXT)
Subject: RE: Technical Review - O2426 Prysmian Cables and Systems USA, LLC (Renewal, 37080)
Attachments: Prysmian Title V O2426 - Updated Forms 1312025.pdf

Hi Jasmine:

Please see the following responses (in red) to your request for additional review questions received on January 9, 2025, and then as a follow-up on January 24, 2025. Please review and let me know if you have any questions or need anything else.

1, All PBRs listed on OP-REQ1 page 87 should be on OP-PBRSUP. Read the form instructions carefully please.

Noted in the updated forms attached with this submittal.

2, On OP-PBRSUP Form dated 10/29/2024, PBR 106.227 and 106.452 should be on Table A, B, and D. From the OP-PBSUP instruction table, these PBRs need to go to table A,B,D, and they are not insignificant PBR.

PBRs 106.227 and 106.452 are addressed in Table B and D in the updated OP-PBRSUP form attached with this submittal.

2, PBR 106.261/09/04/2000; 106.262/11/01/2003, 106.472/09/04/2000 are not included in OP-REQ1 page 88. But they are in the OP-PBRSUP form. You need to either add them to OP-REQ1 or remove them from PBRSUP.

Noted and addressed in the updated forms attached with this submittal.

3, From OP-PBRSUP Table B dated 12/04/2024 has BLDG-2 under PBR 89, Version date 11/01/2001. I think it should be 09/23/1982 version date in OP-REQ1 page 87.

Correction noted and addressed in the updated forms attached with this submittal.

4, You have 106.472 on OP-REQ1 page 88. But on PBRSUP, Table B dated 12/04/2024 does not have 106.472 for tanks. The tanks used on be on the form in 08/2024 version. The unit ID should be specific matching the unit IDs on UA form/REQ2 form. General term "Tanks" is not acceptable, but tank IDs are correct.

The tanks are authorized under SE #059 and the latest updated forms reflect the same. Any references 106.472 have been removed from the revised forms included with this submittal.

5, please revise the forms and send me the updated forms with new date. OP-PBRSUP should be a set with same date on Table A through D.

Draft forms were provided on January 16, 2025, to address items #1 thru 5 received on January 9, 2025, for TCEQ review and comments. Additionally, we have addressed the remaining issues based on the comments received on January 24, 2025, in response to the draft comments (see below). Please note, all the updated forms included with this submittal are re-dated with today's submittal date of 1/31/2025 and replace all previous submissions corresponding to the forms.

1, In your OP-REQ1 PBR list, at the top, you listed 59/05/08/1972 twice; at the bottom table, you have 106.261 list four times, one is 107.261. In your current permit, 59 has 2 versions, 05/08/1972 and 03/15/1985. Please fix these PBRs and correct the form.

Removed the duplicate 59/05/08/1972 reference. The version of the Standard Exemption will be 05/08/1972 as referenced in the current SOP. Fixed the typo for 107 to 106.261. Please see attached the updated forms.

2, OP-PBRSUP page 5, Breaker Plate Cleaning has 102 authorization. But your previous permit application has unit ID BREAK PLATE (breaker plate cleaning) under 106/07/20/1992. Which one is correct?

BREAKER PLATE (Breaker Plate Cleaning) will be referenced under 106/07/20/1992, the same as the current SOP. Please see attached the updated forms.

3, Unit CABLE MANUFACT, OP-PBRSUP indicate it is under 106.262 only. But previously, you indicated it is under 106.261 and 106.262. see pic below. Please clarify what PBRs it is under? I will make change. If OP-PBRSUP needs to update, please update.

106.261 for Cable Manufacturing has been consolidated under the pending NSR. Cable Manufacturing Operations under 106.262/11/012003 (82175) will remain as referenced in the updated OP-PBRSUP form attached.

In addition, your permit shields have some issues.

1, In existing permit, Permit shield Table, BLDG-2: The negative reason "The cable making and making removal operations are not affected by and are not associated with any MACT categories". This is too general, not relating with degreasing process and MACT categories not related with 115 degreasing process. So, if you want to keep this shield, please revise this reason. It could be the same as BLDG-4, which is based on location. It is more clear. However, title V permit shield usually do not include the permit shield based on location because the location will never change from your operation. The permit shields are for certain operation could be shield from the potential rule. But location is no potential at all. So, I suggest you remove all the permit shield based on location as the site never would be subject to those rules.

We deleted permit shields for 30 TAC 115 for BLDG-2 and BLDG-4 as represented in the updated OP-REQ2 included with this submittal.

2, Does BLDG-2 need MACT T permit shield as BLDG-4 has MACT T?

We have removed the applicability of MACT T for BLDG-2 and BLDG-4 as represented in the updated OP-REQ2 attached with this submittal.

3. In existing permit -> permit shield table, heaters have permit shield for 30 TAC Chapter 117 minor source combustion with the reason of "The facility is not a major source of Nox in a nonattainment area." This reads just conflicting with the regulation name. You can either remove this permit shield as the location based permit shield is not encouraged at all OR you have to revise the permit

shield reason as “The facility is not a minor source in the Houston-Galveston-Brazoria nor Dallas-Fort Worth ozone nonattainment area.” Let me know which way you want to proceed. Please keep in mind we could streamline the permit and get rid of unnecessary permit shields.

To streamline the process, we are OK with removing permit shields that are not required either due to location and/or due to the process not being an affected source for Item # 1, 2, 3. The OP-REQ2 form attached with this submittal has been updated to reflect the changes.

4, For new proposed permit shields, it is not acceptable to have two reasons for one rule shields. You can only have 1 permit shield for MACT FFFF with one reason. In general, we do not need to list all reasons for one rule shield.

For example, you could remove the second shield for cooling tower. As the first reason sounds more related to the cooling tower. For other sources, maybe the other reason fits better. It is up to you. Please revise OP-REQ2 and send a complete one to me with new date.

Also, the citation in the negative reason should be 63.2435(b), not 2435(b). You miss 63. In other places, 63.2435(b) and 63.2435(c)(4) are mixed used, which you needs to correct.

Correction noted. We have updated the OP-REQ2 form to list single non-applicability shield and reference it as per the instructions in the form. Please see the attached revised OP-REQ2 form.

6, Please clarify what MIS-MSS represents. If the MIS-MSS is just emissions from other emission units' ancillary activities, the requirements/negative requirements are already covered by those emission sources' requirements and MIS-MSS should not be listed in Title V permit. Since Title V uses FIN (Facility Identification Numbers), there can be cases where and EPN listed in an NSR does not appear in the Title V permit. On the other hand, if MIS-MISS is an actual MSS activity, not covered by other unit IDs with its own potential applicable requirement, then it could stay and have its own shields. Please clarify.

The MIS-MSS is an emission source that includes emissions from miscellaneous MSS activities Schedule A and B related to the processes facility wide as required by the NSR permitting. It does not specifically have any additional permit shield that are not already listed. So, we will not need additional permit shields for this source. No further action needed.

4, Regarding the out of compliance unit AF-01-16, OP-ACPS page 2 correction plan states you would submit permit shield MACT FFFF for this unit.

I am thinking if you submit OP-REQ2 for this unit, then the non-compliance issue will be resolved. If that is the case, please submit OP-ACPS showing all units in compliance (re-date OP-ACPS).

However, I looked into your OP-REQ2, OP-REQ2 does not include this unit AF-01-16 for MACT FFFF permit shield.

Do you want to add this unit on OP-REQ2 for permit shield MACT FFFF? If so, please submit updated OP-REQ2 to include this unit (along with OP-ACPS updates).

The compliance unit AF-01-16 was deleted and the sources covered under this emission point are being re-permitted under the pending NSR and Title V SOP permits currently under TCEQ Review.

The re-permitted sources are listed individually for MACT FFFF permit shield under the OP-REQ2 form. The deletion of AF-01-16 and corresponding regulatory requirement were addressed in the OP-SUMR and OP-REQ3 forms. We would like to proceed with the same arrangement for these sources as shown in our latest submittal of the forms.

With regards to the OP-ACPS, we are including a new OP-ACPS form re-dated (1/31/2025) to show all the units are in compliance as any non-compliance issues will be resolved when the pending NSR and Title are issued, and no further action is needed.

From: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>
Sent: Friday, January 24, 2025 2:54 PM
To: Arthi Reddy <Arthi.Reddy@c-ka.com>; Gordon Moore <gordon.moore@c-ka.com>
Cc: Gordon Moore <gordon.moore@c-ka.com>; Garner Wendy <wendy.garner@prysmian.com>
Subject: RE: Technical Review - O2426 Prysmian Cables and Systems USA, LLC (Renewal, 37080)

Regarding the out of compliance unit AF-01-16, OP-ACPS page 2 correction plan states you would submit permit shield MACT FFFF for this unit.

I am thinking if you submit OP-REQ2 for this unit, then the non-compliance issue will be resolved. If that is the case, please submit OP-ACPS showing all units in compliance (re-date OP-ACPS).

However, I looked into your OP-REQ2, OP-REQ2 does not include this unit AF-01-16 for MACT FFFF permit shield.

Do you want to add this unit on OP-REQ2 for permit shield MACT FFFF? If so, please submit updated OP-REQ2 to include this unit (along with OP-ACPS updates).

Thanks
Jasmine

From: Jasmine Yuan
Sent: Friday, January 24, 2025 10:53 AM
To: Arthi Reddy <Arthi.Reddy@c-ka.com>; Gordon Moore <gordon.moore@c-ka.com>
Cc: Gordon Moore <gordon.moore@c-ka.com>; Garner Wendy <wendy.garner@prysmian.com>
Subject: RE: Technical Review - O2426 Prysmian Cables and Systems USA, LLC (Renewal, 37080)

Hello Arthi,

I have reviewed your submittals on 01/16/2025. However, I still found mistakes.

A friendly reminder please use the same email string when you reply, don't open a new email string. This is easy to manage all emails. All emails and submittals will be post on website during public notice and afterwards.

Regarding to your submittals, the following are deficiencies I found

XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)

I. Permits by Rule (30 TAC Chapter 106) for the Application Area

A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.

Please refer to the Attachment OP-REQ1-Page88-I

PBR No.:	008	Version No./Date:	05/8/1972
PBR No.:	034	Version No./Date:	07/20/1992
PBR No.:	036	Version No./Date:	03/15/1985
PBR No.:	039	Version No./Date:	03/15/1985
PBR No.:	059	Version No./Date:	05/08/1972
PBR No.:	070	Version No./Date:	03/15/1985
PBR No.:	083	Version No./Date:	03/15/1985
PBR No.:	089	Version No./Date:	09/23/1982
PBR No.:	106	Version No./Date:	07/20/1992
PBR No.:	103	Version No./Date:	03/15/1985
PBR No.:	106.103	Version No./Date:	09/04/2000
PBR No.:	106.122	Version No./Date:	09/04/2000
PBR No.:	106.183	Version No./Date:	09/04/2000
PBR No.:	106.183	Version No./Date:	09/04/2001
PBR No.:	106.227	Version No./Date:	09/04/2000
PBR No.:	106.265	Version No./Date:	09/04/2000
PBR No.:	106.266	Version No./Date:	09/04/2000
PBR No.:	106.317	Version No./Date:	09/04/2000
PBR No.:	106.391	Version No./Date:	09/04/2000
PBR No.:	106.433	Version No./Date:	09/04/2000
PBR No.:	106.452	Version No./Date:	09/04/2000
PBR No.:	106.454	Version No./Date:	11/1/2001
PBR No.:	106.511	Version No./Date:	09/04/2000
PBR No.:	106.262	Version No./Date:	11/1/2003
PBR No.:	106.261	Version No./Date:	11/1/2003
PBR No.:	106.261	Version No./Date:	11/1/2003
PBR No.:	106.261	Version No./Date:	11/1/2003
PBR No.:	106.261	Version No./Date:	11/1/2003

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

Date	Permit Number	Regulated Entity Number
1/31/2025	O-2426	RN100236017

Unit ID No.	Registration No.	PBR No.	Registration Date
CABLE MANUFACT (Wire Drawer #7)	82175	106.262	6/29/2007
Pellet Receiving and Storage (Fabric Filter)	74613	106.261	2/9/2005
CL-01-16	140882	106.433	7/15/2016
SILO 90-1	78077	106.261	3/1/2006

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

Date	Permit Number	Regulated Entity Number
1/31/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date
Wire Pre Heater	008	05/08/1972
Laboratory Equipment	034	07/20/1992
Wire Drawing	036	03/15/1985
Shop Welding	039	03/15/1985
1012 (Used Oil Tank)	059	05/08/1972
1013 (Used Oil Tank)	059	05/08/1972
1014 (Lube Bin 1)	059	05/08/1972
1016 (Lube Bin 3)	059	05/08/1972
1017 (Lube Bin 4)	059	05/08/1972
Shop Welding	070	03/15/1985
Propane Storage	083	03/15/1985
BLDG-2 (Cable Labeling)	089	09/23/1982
BREAKER PLATE (Breaker Plate Cleaning)	106	07/20/1992
Refrigeration Systems	103	03/15/1985

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

Date	Permit Number	Regulated Entity Number
1/31/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date
Laboratory Equipment	106.122	09/04/2000
HEAT 1-A-M	106.183	09/04/2000
HEAT 1-N	106.183	09/04/2000
HEAT 1-O	106.183	09/04/2000
HEAT 2-A	106.183	09/04/2000
HEAT 2-B	106.183	09/04/2000
HEAT 3	106.183	09/04/2000
HEAT 4-11	106.183	09/04/2000
HEAT BLDG-1	106.183	09/04/2000
ANNEAL01	106.183	09/04/2000

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

Date	Permit Number	Regulated Entity Number
1/31/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date
Shop Welding	106.227	09/04/2000
Hand Held Manually Operated Machines	106.265	09/04/2000
Vaccum Cleaning System	106.266	09/04/2000
Wire Drawing (AD-01-16; AD-02-16)	106.317	09/04/2000
Rubber and Plastic Curing Process	106.391	09/04/2000
Enclosed Abrasive Cleaning	106.452	09/04/2000
BLDG-4 (Cold Solvent Cleaners & Degreasing)	106.454	11/01/2001
EMGCYGEN	106.511	09/4/2000
1003 (Pellet Storage Silo)	106.261	11/01/2003
1008 (Test Bin)	106.261	11/01/2003

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

Date	Permit Number	Regulated Entity Number
1/31/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
CABLE MANUFACT (Wire Drawer #7)	106.262	82175	Compliance demonstration with 106.8 and 106.4 for any consecutive 12 month period by maintaining records regarding the quantity of air contaminants emitted by the facility.
Pellet Receiving and Storage (Fabric Filter)	106.261	74613	Visible emissions, except uncombined water, to the atmosphere from any point or fugitive source shall not exceed 5.0% opacity in any six-minute period using Method 9. Compliance with 106.4 and 106.8.
CL-01-16	106.433	140882	Visible emissions, except uncombined water, to the atmosphere from any point or fugitive source shall not exceed 5.0% opacity in any six-minute period using Method 9. Data of daily coatings and solvent use and the actual hours of operation of each coating or stripping operation; A monthly report that represents actual hours of operation each day, and emissions from each operation in terms of pounds per hour; pound per day; pounds per week and tons emitted from the site during the previous 12 months. Records as per 106.8.
SILO 90-1	106.261	78077	Visible emissions, except uncombined water, to the atmosphere from any point or fugitive source shall not exceed 5.0% opacity in any six-minute period using Method 9. Compliance with 106.4 and 106.8

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

Date	Permit Number	Regulated Entity Number
1/31/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
Wire Pre Heater	008	05/08/1972	Monitor fuel consumption rate.
Laboratory Equipment	034	07/20/1992	Maintain equipment records used for chemical and physical analyses
Wire Drawing	036	03/15/1985	Maintain equipment records.
Shop Welding	039	03/15/1985	Maintain equipment operating hours and material usage records.
1012 (Used Oil Tank)	059	05/08/1972	Maintain records of tank throuput.
1013 (Used Oil Tank)	059	05/08/1972	Maintain records of tank throuput.
1014 (Lube Bin 1)	059	05/08/1972	Maintain records of tank throuput.
1016 (Lube Bin 3)	059	05/08/1972	Maintain records of tank throuput.
1017 (Lube Bin 4)	059	05/08/1972	Maintain records of tank throuput.

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

Date	Permit Number	Regulated Entity Number
1/31/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
Shop Welding	070	03/15/1985	Maintain equipment operating hours and material usage records.
Propane Storage	083	03/15/1985	Maintain records of tank throughput
BLDG-2 (Cable Labeling)	089	09/23/1982	Maintain records of operating hours and surface coatings usage
BREAKER PLATE (Breaker Plate Cleaning)	106	07/20/1992	Monitor visible emission not to exceed 5% opacity in any five minute period and records of emissions activity not to exceed the exemption limitations.
Refrigeration Systems	103	03/15/1985	Maintain records of activity
Laboratory Equipment	106.122	09/04/2000	Recordkeeping requirements as per 106.8 to demonstrate compliance with PBR claimed

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

Date	Permit Number	Regulated Entity Number
1/31/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
HEAT 1-A-M HEAT 1-N HEAT 1-O HEAT 2-A HEAT 2-B HEAT 3 HEAT 4-11 HEAT BLDG-1	106.183	09/04/2000	Recordkeeping requirements as per 106.8 to demonstrate compliance with PBR claimed
ANNEAL01	106.183	09/04/2000	Recordkeeping requirements as per 106.8 to demonstrate compliance with PBR claimed
Hand Held Manually Operated Machines	106.265	09/04/2000	Recordkeeping to demonstrate compliance with PBR claimed
Vaccum Cleaning System	106.266	09/04/2000	Recordkeeping to demonstrate compliance with PBR claimed
Wire Drawing (AD-01-16; AD-02-16)	106.317	09/04/2000	Recordkeeping requirements as per 106.8 to demonstrate compliance with PBR claimed
Rubber and Plastic Curing Process	106.391	09/04/2000	Recordkeeping requirements as per 106.8 to demonstrate compliance with PBR claimed

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

Date	Permit Number	Regulated Entity Number
1/31/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
Enclosed Abrasive Cleaning	106.452	09/04/2000	Records of operating hours, material usage and other recordkeeping as per 106.8 to demonstrate compliance with PBR claimed.
BLDG-4 (Cold Solvent Cleaners & Degreasing)	106.454	11/01/2001	Records of solvents usage on monthly basis and compliance with 106.8.
EMGCYGEN	106.511	09/4/2000	Annual hours not to exceed 10% of the normal operating schedule and compliance with PBR and other applicable regulations.
1003	106.261	11/01/2003	Visible emissions and recordkeeping as per 106.8 to demonstrate compliance.
1008	106.261	11/01/2003	Visible emissions and recordkeeping as per 106.8 to demonstrate compliance.

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

Date	Permit No.	Regulated Entity No.
1/31/2025	O-2426	RN100236017

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
A	14	GRPDHFVENT	OP-REQ2	MACT FFFF	§63. 2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer
	15					
	16					
	17					
	18					
	19					
	20					
A	21	GRPBLGCV	OP-REQ2	MACT FFFF	§63. 2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer
	22					
	23					
	24					
	25					
	26					
	27					
A	28	GRPFUGCV	OP-REQ	MACT FFFF	§63. 2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer
	29					
	30					
	31					
	32					
	33					
	34					

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

Date	Permit No.	Regulated Entity No.
1/31/2025	O-2426	RN100236017

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
A	35 36 37 38 39	GRPBLGJ	OP-REQ2	MACT FFFF	§63.2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer
A	40 41 42 43 44	GRPFUGJ	OP-REQ2	MACT FFFF	§63.2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer
A	45 46	GRPBLGM	OP-REQ2	MACT FFFF	§63.2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer

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

Date	Permit No.	Regulated Entity No.
1/31/2025	O-2426	RN100236017

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
A	47 48	GRPFUGM	OP-REQ2	MACT FFFF	§63.2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer
A	49 50	GRPCWT	OP-UA13	MACT FFFF	§63.2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer
A	49 50	GRPCWT	OP-UA13	MACT Q	§63.400(a)	The cooling towers do not operate with chromium-based water treatment chemicals.

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

Date	Permit No.	Regulated Entity No.
1/31/2025	O-2426	RN100236017

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
D	60	COOL 1	OP-REQ2	MACT Q	§63.400(a)	The cooling tower does not operate with chromium-based water treatment chemicals.
A	61	CL-01-16	OP-UA18	MACT MMMM	§63.3881(c)(5)	This subpart does not apply to surface coating operations where plastic is extruded onto a metal wire or cable or metal parts or products to form a coating.
A	62 63 64 65	GRPWWTCL	OP-REQ2	MACT FFFF	§63. 2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer
A	66	PWCL-1	OP-REQ2	MACT FFFF	§63. 2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer.

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

Date: 01/31/2025	Regulated Entity No.: RN100236017	Permit No.: O-2426
Company Name: Prysmian Cables and Systems USA, LLC		Area Name: Prysmian Cables and Systems

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

Part 1

A. Compliance Plan — Future Activity Committal Statement	
<p>The <i>Responsible Official</i> commits, utilizing reasonable effort, to the following: As the responsible official it is my intent that all emission units shall continue to be in compliance with all applicable requirements they are currently in compliance with, and all emission units shall be in compliance by the compliance dates with any applicable requirements that become effective during the permit term.</p>	
B. Compliance Certification - Statement for Units in Compliance* (Indicate response by entering an "X" in the appropriate column)	
1. With the exception of those emission units listed in the Compliance Schedule section of this form (Part 2, below), and based, at minimum, on the compliance method specified in the associated applicable requirements, are all emission units addressed in this application in compliance with all their respective applicable requirements as identified in this application?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. If the response to Item B.2, above, is "Yes," indicate the total number of Part 2 attachments included in this submittal. <i>(For reference only)</i>	0
<p>* For Site Operating Permits (SOPs), the complete application should be consulted for applicable requirements and their corresponding emission units when assessing compliance status. For General Operating Permits (GOPs), the application documentation, particularly Form OP-REQ1 should be consulted as well as the requirements contained in the appropriate General Permits portion of 30 TAC Chapter 122.</p> <p>Compliance should be assessed based, at a minimum, on the required monitoring, testing, record keeping, and/or reporting requirements, as appropriate, associated with the applicable requirement in question.</p>	

From: Arthi Reddy <Arthi.Reddy@c-ka.com>
Sent: Thursday, January 16, 2025 11:29 AM
To: Jasmine Yuan
Cc: Gordon Moore; Garner Wendy; Scassiotti Marina (EXT)
Subject: Re: Draft Forms OP-PBRSUP and OP-REQ2 for Review
Attachments: Attachment 5- OP-REQ1-Page88-I.pdf; Attachment 1- OP-PBRSUP.docx;
Attachment OP-REQ2 11025.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Jasmine:

Thank you for your time this morning to discuss our responses and status of the project. Please see the updated draft forms of OP-PBRSUP, OP-REQ2 and OP-REQ Page # 88. I have revised the forms as per your suggestion.

On the PBRSUP forms, I have moved all the registered, claimed PBRs and exemptions to Tables A, B and D same as all others and based on TCEQ definition of insignificant source. Most of these PBRs/SE are for routine/normal operations.

Please review and let me know if everything looks good. If you have any comments or any changes, we will incorporate them before sending you the final version of the forms. Please let me know if you have any questions.

Thanks
Arthi

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

Date	Permit No.	Regulated Entity No.
1/16/2025	O-2426	RN100236017

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
A	14	GRPDHFVENT	OP-REQ2	MACT FFFF	§63. 2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer
	15					
	16					
	17					
	18					
	19					
	20					
A	21	GRPBLGCV	OP-REQ2	MACT FFFF	§63. 2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer
	22					
	23					
	24					
	25					
	26					
	27					
A	28	GRPFUGCV	OP-REQ	MACT FFFF	§63. 2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer
	29					
	30					
	31					
	32					
	33					
	34					

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

Date	Permit No.	Regulated Entity No.
1/16/2025	O-2426	RN100236017

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
A	35 36 37 38 39	GRPBLGJ	OP-REQ2	MACT FFFF	§63.2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer
A	40 41 42 43 44	GRPFUGJ	OP-REQ2	MACT FFFF	§63.2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer
A	45 46	GRPBLGM	OP-REQ2	MACT FFFF	§63.2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer

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

Date	Permit No.	Regulated Entity No.
1/16/2025	O-2426	RN100236017

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
A	47 48	GRPFUGM	OP-REQ2	MACT FFFF	§63.2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer
A	49 50	GRPCWT	OP-UA13	MACT FFFF	§63.2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer
A	49 50	GRPCWT	OP-UA13	MACT Q	§63.400(a)	The cooling towers do not operate with chromium-based water treatment chemicals.

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

Date	Permit No.	Regulated Entity No.
1/16/2025	O-2426	RN100236017

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
D	60	COOL 1	OP-REQ2	MACT Q	§63.400(a)	The cooling tower does not operate with chromium-based water treatment chemicals.
A	61	CL-01-16	OP-UA18	MACT MMMM	§63.3881(c)(5)	This subpart does not apply to surface coating operations where plastic is extruded onto a metal wire or cable or metal parts or products to form a coating.
A	62 63 64 65	GRPWWTCL	OP-REQ2	MACT FFFF	§63. 2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer
A	66	PWCL-1	OP-REQ2	MACT FFFF	§63. 2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer.

XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)

I. Permits by Rule (30 TAC Chapter 106) for the Application Area

A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.

Please refer to the Attachment OP-REQ1-Page88-I

PBR No.:	008	Version No./Date:	05/8/1972
PBR No.:	034	Version No./Date:	07/20/1992
PBR No.:	036	Version No./Date:	03/15/1985
PBR No.:	039	Version No./Date:	03/15/1985
PBR No.:	059	Version No./Date:	05/08/1972
PBR No.:	059	Version No./Date:	05/08/1972
PBR No.:	070	Version No./Date:	03/15/1985
PBR No.:	083	Version No./Date:	03/15/1985
PBR No.:	089	Version No./Date:	09/23/1982
PBR No.:	102	Version No./Date:	07/20/1992
PBR No.:	103	Version No./Date:	03/15/1985
PBR No.:	106.103	Version No./Date:	09/04/2000
PBR No.:	106.122	Version No./Date:	09/04/2000
PBR No.:	106.183	Version No./Date:	09/04/2000
PBR No.:	106.183	Version No./Date:	09/04/2001
PBR No.:	106.227	Version No./Date:	09/04/2000
PBR No.:	106.265	Version No./Date:	09/04/2000
PBR No.:	106.266	Version No./Date:	09/04/2000
PBR No.:	106.317	Version No./Date:	09/04/2000
PBR No.:	106.391	Version No./Date:	09/04/2000
PBR No.:	106.433	Version No./Date:	09/04/2000
PBR No.:	106.452	Version No./Date:	09/04/2000
PBR No.:	106.454	Version No./Date:	11/1/2001
PBR No.:	106.511	Version No./Date:	09/04/2000
PBR No.:	106.262	Version No./Date:	11/1/2003
PBR No.:	106.261	Version No./Date:	11/1/2003
PBR No.:	106.261	Version No./Date:	11/1/2003
PBR No.:	107.261	Version No./Date:	11/1/2003
PBR No.:	106.261	Version No./Date:	11/1/2003

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

Date	Permit Number	Regulated Entity Number
1/16/2025	O-2426	RN100236017

Unit ID No.	Registration No.	PBR No.	Registration Date
CABLE MANUFACT (Wire Drawer #7)	82175	106.262	6/29/2007
Pellet Receiving and Storage (Fabric Filter)	74613	106.261	2/9/2005
CL-01-16	140882	106.433	7/15/2016
SILO 90-1	78077	106.261	3/1/2006

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

Date	Permit Number	Regulated Entity Number
1/16/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date
Wire Pre Heater	008	05/08/1972
Laboratory Equipment	034	07/20/1992
Wire Drawing	036	03/15/1985
Shop Welding	039	03/15/1985
1012 (Used Oil Tank)	059	05/08/1972
1013 (Used Oil Tank)	059	05/08/1972
1014 (Lube Bin 1)	059	05/08/1972
1016 (Lube Bin 2)	059	05/08/1972
1017 (Lube Bin 3)	059	05/08/1972
Shop Welding	070	03/15/1985
Propane Storage	083	03/15/1985
BLDG-2 (Cable Labeling)	089	09/23/1982
Breaker Plate Cleaning	102	07/20/1992
Refrigeration Systems	103	03/15/1985

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

Date	Permit Number	Regulated Entity Number
1/16/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date
Laboratory Equipment	106.122	09/04/2000
HEAT 1-A-M	106.183	09/04/2000
HEAT 1-N	106.183	09/04/2000
HEAT 1-O	106.183	09/04/2000
HEAT 2-A	106.183	09/04/2000
HEAT 2-B	106.183	09/04/2000
HEAT 3	106.183	09/04/2000
HEAT 4-11	106.183	09/04/2000
HEAT BLDG-1	106.183	09/04/2000
ANNEAL01	106.183	09/04/2000

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

Date	Permit Number	Regulated Entity Number
1/16/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date
Shop Welding	106.227	09/04/2000
Hand Held Manually Operated Machines	106.265	09/04/2000
Vaccum Cleaning System	106.266	09/04/2000
Wire Drawing (AD-01-16; AD-02-16)	106.317	09/04/2000
Rubber and Plastic Curing Process	106.391	09/04/2000
Enclosed Abrasive Cleaning	106.452	09/04/2000
BLDG-4 (Cold Solvent Cleaners & Degreasing)	106.454	11/01/2001
EMGCYGEN	106.511	09/4/2000
1003 (Pellet Storage Silo)	106.261	11/01/2003
1008 (Test Bin)	106.261	11/01/2003

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

Date	Permit Number	Regulated Entity Number
1/16/2025	O-2426	RN100236017

PBR No.	Version No./Date

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

Date	Permit Number	Regulated Entity Number
1/16/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
CABLE MANUFACT (Wire Drawer #7)	106.262	82175	Compliance demonstration with 106.8 and 106.4 for any consecutive 12 month period by maintaining records regarding the quantity of air contaminants emitted by the facility.
Pellet Receiving and Storage (Fabric Filter)	106.261	74613	Visible emissions, except uncombined water, to the atmosphere from any point or fugitive source shall not exceed 5.0% opacity in any six-minute period using Method 9. Compliance with 106.4 and 106.8.
CL-01-16	106.433	140882	Visible emissions, except uncombined water, to the atmosphere from any point or fugitive source shall not exceed 5.0% opacity in any six-minute period using Method 9. Data of daily coatings and solvent use and the actual hours of operation of each coating or stripping operation; A monthly report that represents actual hours of operation each day, and emissions from each operation in terms of pounds per hour; pound per day; pounds per week and tons emitted from the site during the previous 12 months. Records as per 106.8.
SILO 90-1	106.261	78077	Visible emissions, except uncombined water, to the atmosphere from any point or fugitive source shall not exceed 5.0% opacity in any six-minute period using Method 9. Compliance with 106.4 and 106.8

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

Date	Permit Number	Regulated Entity Number
1/16/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
Wire Pre Heater	008	05/08/1972	Monitor fuel consumption rate.
Laboratory Equipment	034	07/20/1992	Maintain equipment records used for chemical and physical analyses
Wire Drawing	036	03/15/1985	Maintain equipment records.
Shop Welding	039	03/15/1985	Maintain equipment operating hours and material usage records.
1012 (Used Oil Tank)	059	05/08/1972	Maintain records of tank throuput.
1013 (Used Oil Tank)	059	05/08/1972	Maintain records of tank throuput.
1014 (Lube Bin 1)	059	05/08/1972	Maintain records of tank throuput.
1016 (Lube Bin 2)	059	05/08/1972	Maintain records of tank throuput.
1017 (Lube Bin 3)	059	05/08/1972	Maintain records of tank throuput.

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

Date	Permit Number	Regulated Entity Number
1/16/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
Shop Welding	070	03/15/1985	Maintain equipment operating hours and material usage records.
Propane Storage	083	03/15/1985	Maintain records of tank throughput
BLDG-2 (Cable Labeling)	089	09/23/1982	Maintain records of operating hours and surface coatings usage
Breaker Plate Cleaning	102	07/20/1992	Monitoring and recordkeeping of hours and abrasive material usage. Monitor for no visible emissions
Refrigeration Systems	103	03/15/1985	Maintain records of activity

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

Date	Permit Number	Regulated Entity Number
1/16/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
Laboratory Equipment	106.122	09/04/2000	Recordkeeping requirements as per 106.8 to demonstrate compliance with PBR claimed
HEAT 1-A-M HEAT 1-N HEAT 1-O HEAT 2-A HEAT 2-B HEAT 3 HEAT 4-11 HEAT BLDG-1	106.183	09/04/2000	Recordkeeping requirements as per 106.8 to demonstrate compliance with PBR claimed
ANNEAL01	106.183	09/04/2000	Recordkeeping requirements as per 106.8 to demonstrate compliance with PBR claimed
Hand Held Manually Operated Machines	106.265	09/04/2000	Recordkeeping to demonstrate compliance with PBR claimed
Vaccum Cleaning System	106.266	09/04/2000	Recordkeeping to demonstrate compliance with PBR claimed
Wire Drawing (AD-01-16; AD-02-16)	106.317	09/04/2000	Recordkeeping requirements as per 106.8 to demonstrate compliance with PBR claimed
Rubber and Plastic Curing Process	106.391	09/04/2000	Recordkeeping requirements as per 106.8 to demonstrate compliance with PBR claimed

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

Date	Permit Number	Regulated Entity Number
1/16/2025	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
Enclosed Abrasive Cleaning	106.452	09/04/2000	Records of operating hours, material usage and other recordkeeping as per 106.8 to demonstrate compliance with PBR claimed.
BLDG-4 (Cold Solvent Cleaners & Degreasing)	106.454	11/01/2001	Records of solvents usage on monthly basis and compliance with 106.8.
EMGCYGEN	106.511	09/4/2000	Annual hours not to exceed 10% of the normal operating schedule and compliance with PBR and other applicable regulations.
1003	106.261	11/01/2003	Visible emissions and recordkeeping as per 106.8 to demonstrate compliance.
1008	106.261	11/01/2003	Visible emissions and recordkeeping as per 106.8 to demonstrate compliance.

From: [Jasmine Yuan](#)
To: [Arthi Reddy](#)
Cc: [Gordon Moore](#); [Garner Wendy](#)
Subject: RE: Technical Review - 02426 Prysmian Cables and Systems USA, LLC (Renewal, 37080)
Date: Thursday, January 9, 2025 3:11:00 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

When I review OP-PBRSUP and OP-REQ1 page 88 for PBRs, I found many PBRs are not matching across the forms. You have to fix it and make sure two forms PBRs are consistent and matching.

Form OP-PBRSUP must be submitted as a set to be considered complete; all four tables must have the same date on them. That date will be referenced in the permit.

In specific:

- 1, All PBRs listed on OP-REQ1 page 87 should be on OP-PBRSUP. Read the form instructions carefully please.
- 2, On OP-PBRSUP Form dated 10/29/2024, PBR 106.227 and 106.452 should be on Table A, B, and D. From the OP-PBRSUP instruction table, these PBRs need to go to the table A,B,D, and they are not insignificant PBR.
- 2, PBR 106.261/09/04/2000; 106.262/11/01/2003, 106.472/09/04/2000 are not included in OP-REQ1 page 88. But they are in the OP-PBRSUP form. You need to either add them to OP-REQ1, or remove them from PBRSUP.
- 3, From OP-PBRSUP Table B dated 12/04/2024 has BLDG-2 under PBR 89, Version date 11/01/2001. I think it should be 09/23/1982 version date in OP-REQ1 page 87.
- 4, You have 106.472 on OP-REQ1 page 88. But on PBRSUP, Table B dated 12/04/2024 does not have 106.472 for tanks. The tanks used on be on the form in 08/2024 version. The unit ID should be specific matching the unit IDs on UA form/REQ2 form. General term "Tanks" is not acceptable, but tank IDs are correct.
- 5, please revise the forms and send me the updated forms with new date. OP-PBRSUP should be a set with same date on Table A through D.

In addition, your permit shields have some issues.

- 1, In existing permit, Permit shield Table, BLDG-2: The negative reason "The cable making and making removal operations are not affected by and are not associated with any MACT categories". This is too general, not relating with degreasing process and MACT categories not related with 115 degreasing process. So, if you want to keep this shield, please revise this reason. It could be the same as BLDG-4, which is based on location. It is more clear. However, title V permit shield usually do not include the permit shield based on location because the location will never change from your operation. The permit shields are for certain operation could be shield from the potential rule. But location is no potential at all. So, I suggest you remove all the permit shield based on location as the site never would be subject to those rules.
- 2, Does BLDG-2 need MACT T permit shield as BLDG-4 has MACT T?

Unit/Group/Process		Regulation	Basis of Determination
ID No.	Group/Inclusive Units		
1003	N/A	40 CFR Part 63, Subpart JJJ	No facilities at the plant meet the definition of a Thermoplastic Product Process Unit (TPPU)
1008	N/A	40 CFR Part 63, Subpart JJJ	No facilities at the plant meet the definition of a Thermoplastic Product Process Unit (TPPU).
1012	N/A	40 CFR Part 60, Subpart K	The construction of this storage tank commenced prior to 1973.
1013	N/A	40 CFR Part 60, Subpart K	The construction of this storage tank commenced prior to 1973.
1014	N/A	40 CFR Part 60, Subpart K	The construction of this storage tank commenced prior to 1973.
1016	N/A	40 CFR Part 60, Subpart K	The construction of this storage tank commenced prior to 1973.
1017	N/A	40 CFR Part 60, Subpart K	The construction of this storage tank commenced prior to 1973.
BLDG-2	N/A	30 TAC Chapter 115, Degreasing Processes	The cable marking and marking removal operations are not affected by 30 TAC Chapter 115 and are not associated with any MACT categories.
BLDG-4	N/A	30 TAC Chapter 115, Degreasing Processes	The degreaser is not located in a county subject to 30 TAC Chapter 115.
BLDG-4	N/A	40 CFR Part 63, Subpart T	The degreaser does not use halogenated solvents.
BREAK PLATE	N/A	30 TAC Chapter 112, Sulfur Compounds	The heating unit is not solid fossil or liquid fuel-fired.
BREAK PLATE	N/A	30 TAC Chapter 117, Minor Source Combustion	The facility is not a major source of NOx in a

3, In existing permit -> permit shield table, heaters have permit shield for 30 TAC Chapter 117 minor source combustion with the reason of "The facility is not a major source of Nox in a nonattainment area." This reads just conflicting with the regulation name. You can either remove this permit shield as the location based permit shield is not encouraged at all OR you have to revise the permit shield reason as "The facility is not a minor source in the Houston-Galveston-Brazoria nor Dallas-Fort Worth ozone nonattainment area." Let me know which way you want to proceed. Please keep in mind we could streamline the permit and get rid of unnecessary permit shields.

HEAT 3	N/A	30 TAC Chapter 112, Sulfur Compounds	The emission unit is not solid fossil or liquid <u>fuel-fired</u> .
HEAT 3	N/A	30 TAC Chapter 117, Minor Source Combustion	The facility is not a major source of NOx in a nonattainment area.
HEAT 4-11	N/A	30 TAC Chapter 112, Sulfur Compounds	The heating unit is not solid fossil or liquid <u>fuel-fired</u> .
HEAT 4-11	N/A	30 TAC Chapter 117, Minor Source Combustion	The facility is not a major source of NOx in a nonattainment area.
HEAT BLDG-1	N/A	30 TAC Chapter 112, Sulfur Compounds	The heating unit is not solid fossil or liquid <u>fuel-fired</u> .
HEAT BLDG-1	N/A	30 TAC Chapter 117, Minor Source Combustion	The facility is not a major source of NOx in a nonattainment area.

4, For new proposed permit shields, it is not acceptable to have two reasons for one rule shields. You can only have 1 permit shield for MACT FFFF with one reason. In general, we do not need to list all reasons for one rule shield.

For example, you could remove the second shield for cooling tower. As the first reason sounds more related to the cooling tower. For other sources, maybe the other reason fits better. It is up to you. Please revise OP-REQ2 and send a complete one to me with new date.

Also, the citation in the negative reason should be 63.2435(b), not 2435(b). You miss 63.. In other places, 63.2435(b) and 63.2435(c)(4) are mixed used, which you need to correct.

Unit ID	Revision No.	ID No.	Applicable Form	Regulatory Name	Requirement Citation	Previous	Next	Negative Reason
A	47 48	GRPFUGM	OP-REQ2	MACT FFFF	§63. 2435(c)(4)			at the site are from the MON rule as "extrusion and drawing operations." The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to "remove residual HAP monomer"
A	49 50	GRPCWT	OP-UA13	MACT FFFF	§63. 2435(c)(4)			Prysmian produces insulated aluminum cables and does not produce any of the organic chemical products listed in 40 CFR §2435(b). Therefore, there is no MCPU located at the site.
A	49 50	GRPCWT	OP-UA13	MACT FFFF	§63. 2435(c)(4)			The units located at the site are specifically exempt from the MON rule as "extrusion and drawing operations." The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to "remove residual HAP monomer"

TCEQ-10017 (Revised 05-15-02) OP-REQ2 Instructions
This form for use by facilities subject to air quality permit

requirements and may be revised periodically [APDG 5392v21]

Page 5 of 7

5, In your new OP-REQ2, page 6 and 7, you have GRPWWTCL on each page has two negative reasons combined but under one citation 63.2435(c)(4). Please revise the form and just keep one reason.

6, Please clarify what MIS-MSS represents. If the MIS-MSS is just emissions from other emission units' ancillary activities, the requirements/negative requirements are already covered by those emission sources' requirements and MIS-MSS should not be listed in Title V permit. Since Title V uses FIN (Facility Identification Numbers), there can be cases where and EPN listed in an NSR does not appear in the Title V permit. On the other hand, if MIS-MISS is an actual MSS activity, not covered by other unit IDs with its own potential applicable requirement, then it could stay and have its own shields. Please clarify.

Please respond to this email by 01/24/2025. Let me know if you have any questions.

Thank you!
Jasmine Yuan

From: Arthi Reddy <Arthi.Reddy@c-ka.com>

Sent: Friday, January 3, 2025 2:28 PM

To: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>

Cc: Gordon Moore <gordon.moore@c-ka.com>; Garner Wendy <wendy.garner@prysmian.com>

Subject: RE: Technical Review - 02426 Prysmian Cables and Systems USA, LLC (Renewal, 37080)

From: Arthi Reddy <Arthi.Reddy@c-ka.com>
Sent: Friday, January 3, 2025 2:28 PM
To: Jasmine Yuan
Cc: Gordon Moore; Garner Wendy
Subject: RE: Technical Review - O2426 Prysmian Cables and Systems USA, LLC (Renewal, 37080)
Attachments: TCEQ SOP O-2426 NOD -1-2-2025.pdf

Hi Jasmine:

Hope you are doing well. Happy New Year.

Please see the following responses (in bold italic format) to your request for additional review questions received on December 19, 2024. Please review and let me know if you have any questions or need anything else.

1, Unit 60-4 is subject to PM for 30 TAC Chapter 111. So please submit OPMON for the unit. You may also need to revise OP-REQ1 answer to reflect the unit is subject to PM so that the PM term will be populated by macro.

Revised OP-REQ 1 Form Section K (PDF Page #1) to reflect Unit 60-4 is subject to PM. Additionally, Form OP-MON (PDF Page 2 and 3) is included to address the Periodic Monitoring Requirements for Unit 60-4 for Visible Emissions.

2, You did not have unit PWCL-1 in the document. Please submit forms for it if it has requirements for permit shield.

Revised forms OP-2 (PDF Page #4), OP-SUM (PDF Page # 5) and OP-REQ2 (PDF Page #7) are included to address the addition of emission source PWCL-1 and the negative applicability of regulatory requirements. PDF Page #6 is included to correct the typo for Revision #64. Please note the unit description changes for Revision #62 thru 65 on PDF Page #4 and 5.

3, Your OP-2 indicates MIS-MSS on OP-REQ2. But OP-REQ2 does not contain the unit.

Revised OP-REQ2 (PDF Page #8) is included to address the negative applicability of regulatory requirements for the above referenced emission source.

Thanks,
Arthi Reddy

From: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>
Sent: Thursday, December 19, 2024 4:44 PM
To: Arthi Reddy <Arthi.Reddy@c-ka.com>
Cc: Gordon Moore <gordon.moore@c-ka.com>; Garner Wendy <wendy.garner@prysmian.com>
Subject: RE: Technical Review - O2426 Prysmian Cables and Systems USA, LLC (Renewal, 37080)

Hi Arthi,
A few more questions for your updates.

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

Date:	1/2/2025
Permit No.:	O-2426
RN No.:	RN100236017

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

I. Identifying Information		
Account No.: HH0001D	RN No.: RN100236017	CN: CN605993161
Permit No.: O-2426	Project No.: 37080	
Area Name: Prysmian Cables and Systems USA, LLC Marshall Plant		
Company Name: Prysmian Cables and System USA LLC		
II. Unit/Emission Point/Group/Process Information		
Revision No.: 13		
Unit/EPN/Group/Process ID No.: 60-4		
Applicable Form: OP-UA15		
III. Applicable Regulatory Requirement		
Name: 30 TAC Chapter 111 Visible Emissions		
SOP/GOP Index No.: 111-604SILO		
Pollutant: PM (Opacity)		
Main Standard: §111.111(a)(1)(B); §111.111 (a)(1)(F)		
IV. Title V Monitoring Information		
Monitoring Type: PM		
Unit Size:		
CAM/PM Option No.: PM-P-001		
Deviation Limit: Visible Emissions		
CAM/PM Option No.:		
Deviation Limit:		
V. Control Device Information		
Control Device ID No.: 60-4		
Control Device Type: FABFLT		

**Texas Commission on Environmental Quality
Monitoring Requirements
Form OP-MON (Page 2)
Federal Operating Permit Program**

Table 1b: CAM/PM Control Device Additions

Emission Unit ID No.	Control Device ID No.	Control Device Type
60-4	60-4	FABFLT

Form OP-2-Table 2
Texas Commission on Environmental Quality

Date: 1/2/2025
Permit No.: O-2426
Regulated Entity No.: RN100236017
Company Name: Prysmian Cables and Systems USA LLC

Revision No.	Revision Code		Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
62 63 64 65	SIG-E	Yes	GRPWWTCL	OP-REQ2	177396 (Pending)	Adding four (4) open-top 20,000 bbl storage tank as a part of the new process water, non-contact cooling loop.
66	SIG-E	Yes	PWCL-1	OP-REQ2	177396 (Pending)	Addition of a process water, non-contact cooling loop to separate cooling water from process water.

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

[Table 1](#)

Date	Permit No.	Regulated Entity No.
1/2/2025	O-2426	RN100236017

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Proce ss CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
A	61	CL-01-16	OP-UA18	Cable Labeling		106.433/09/04/2000[14 0882]	
A	62	WWT-1	OP- UA1/REQ2	Process Water Cooling Loop Storage Tank		177396 (Pending)	
A	63	WWT-2	OP- UA1/REQ2	Process Water Cooling Loop Storage Tank		177396 (Pending)	
A	64	WWT-3	OP- UA1/REQ2	Process Water Cooling Loop Storage Tank		177396 (Pending)	
A	65	WWT-4	OP- UA1/REQ2	Process Water Cooling Loop Storage Tank		177396 (Pending)	
A	66	PWCL-1	OP-REQ2	Process Water Cooling Loop		177396 (Pending)	

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

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

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

Table 2

Date	Permit No.	Regulated Entity No.
1/2/2025	O-2426	RN100236017

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.
45 46	BLG1-M64 BLG1-M65	OP-REQ2	A	GRPBLGM
47 48	FUG1-M64 FUG1-M64	OP-REQ2	A	GRPFUGM
49 50	CWT-1 CWT-2	OP-UA13	A	GRPCWT
62 63 64 65	WWT-1 WWT-2 WWT-3 WWT-4	OP-REQ2	A	GRPWWTCL

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

Date	Permit No.	Regulated Entity No.
1/2/2025	O-2426	RN100236017

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
A	66	PWTCL	OP-REQ2	MACT F MACT G	§63.100 §63.110(a)	Prysmian produces insulated aluminum cables and does meet all the criteria in 40 CFR §63.100(b). This is not a SOCMF facility. Therefore, the facility is not subject to the requirements in MACT F and G.
A	66	PWTCL	OP-REQ2	MACT FFFF	§63. 2435(c)(4)	Prysmian produces insulated aluminum cables and does not produce any of the organic chemical products listed in 40 CFR §2435(b). Therefore, there is no MCPU located at the site. The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer

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

Date	Permit No.	Regulated Entity No.
1/2/2025	O-2426	RN100236017

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
A	51	MIS-MSS	OP-REQ2	MACT F MACT G	§63.100 §63.110(a)	Prysmian produces insulated aluminum cables and does meet all the criteria in 40 CFR §63.100(b). This is not a SOCFI facility. Therefore, the facility is not subject to the requirements in MACT F and G for normal and MSS operations
A	51	MIS-MSS	OP-REQ2	MACT FFFF	§63. 2435(c)(4)	Prysmian produces insulated aluminum cables and does not produce any of the organic chemical products listed in 40 CFR §2435(b). Therefore, there is no MCPU located at the site. The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer. Therefore, there are no process affected by this subpart for normal or MSS operations.

From: Arthi Reddy <Arthi.Reddy@c-ka.com>
Sent: Friday, January 3, 2025 2:28 PM
To: Jasmine Yuan
Cc: Gordon Moore; Garner Wendy
Subject: RE: Technical Review - O2426 Prysmian Cables and Systems USA, LLC (Renewal, 37080)
Attachments: TCEQ SOP O-2426 NOD -1-2-2025.pdf

Hi Jasmine:

Hope you are doing well. Happy New Year.

Please see the following responses (in bold italic format) to your request for additional review questions received on December 19, 2024. Please review and let me know if you have any questions or need anything else.

1, Unit 60-4 is subject to PM for 30 TAC Chapter 111. So please submit OPMON for the unit. You may also need to revise OP-REQ1 answer to reflect the unit is subject to PM so that the PM term will be populated by macro.

Revised OP-REQ 1 Form Section K (PDF Page #1) to reflect Unit 60-4 is subject to PM. Additionally, Form OP-MON (PDF Page 2 and 3) is included to address the Periodic Monitoring Requirements for Unit 60-4 for Visible Emissions.

2, You did not have unit PWCL-1 in the document. Please submit forms for it if it has requirements for permit shield.

Revised forms OP-2 (PDF Page #4), OP-SUM (PDF Page # 5) and OP-REQ2 (PDF Page #7) are included to address the addition of emission source PWCL-1 and the negative applicability of regulatory requirements. PDF Page #6 is included to correct the typo for Revision #64. Please note the unit description changes for Revision #62 thru 65 on PDF Page #4 and 5.

3, Your OP-2 indicates MIS-MSS on OP-REQ2. But OP-REQ2 does not contain the unit.

Revised OP-REQ2 (PDF Page #8) is included to address the negative applicability of regulatory requirements for the above referenced emission source.

Thanks,
Arthi Reddy

From: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>
Sent: Thursday, December 19, 2024 4:44 PM
To: Arthi Reddy <Arthi.Reddy@c-ka.com>
Cc: Gordon Moore <gordon.moore@c-ka.com>; Garner Wendy <wendy.garner@prysmian.com>
Subject: RE: Technical Review - O2426 Prysmian Cables and Systems USA, LLC (Renewal, 37080)

Hi Arthi,
A few more questions for your updates.

- 1, Unit 60-4 is subject to PM for 30 TAC Chapter 111. So please submit OPMON for the unit. You may also need to revise OP-REQ1 answer to reflect the unit is subject to PM so that the PM term will be populated by macro.
- 2, You did not have unit PWCL-1 in the document. Please submit forms for it if it has requirements for permit shield.
- 3, Your OP-2 indicates MIS-MSS on OP-REQ2. But OP-REQ2 does not contain the unit.

Please respond to this email by 01/10/2025.

Thanks!

Jasmine

From: Arthi Reddy <Arthi.Reddy@c-ka.com>

Sent: Friday, December 13, 2024 8:55 AM

To: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>

Cc: Gordon Moore <gordon.moore@c-ka.com>; Garner Wendy <wendy.garner@prysmian.com>

Subject: RE: Technical Review - O2426 Prysmian Cables and Systems USA, LLC (Renewal, 37080)

Hi Jasmine:

Thank you for your review of the additional information submitted for the above-referenced application to TCEQ on October 30, 2024. On behalf of Prysmian Cables and Systems USA, LLC (Prysmian), C-K Associates (CK) is submitting the following responses (in bold italic format) to your request for additional review questions received on December 2, 2024.

1, I do not see UA15 submitted for unit 60-4. The unit on OP-REQ3 indicates it has index of 111-60SILOS. But I cannot find your UA15. By the way, please follow index number naming instruction and try to use the common index. This is easy for permit reviewers, and region investigators to follow.

Attached OP-UA15 form to address the requirements in Table 1a and b for Chapter 111 for EPN 60-4. The SOP index for the EPN 60-4 has been revised to show 111-604SILO on all forms. Refer to PDF Page #10, 11, 19 and 20 for replacement pages in the attachment.

2, OP-REQ2 does not have GRPBLGCV's permit shield. It listed GRPDHFVENT multiple times. By the way, the regulation name should be MACT FFFF, instead of NESHAP FFFF. Right?

GRPBLGCV has been added and GRP IDs revised to remove the duplicate GRPDHFVENT incorrectly assigned. NESHAP FFFF has been replaced with MACT FFFF wherever applicable. Revised OP-REQ2 replacement pages are attached to this email response. Refer to PDF Pages #3 through 9 for replacement pages in the attachment.

3, GRPCWT will have the same index no. So your original UA13 for cooling towers with different index number is changed to one index 63Q-CWT.

From: Arthi Reddy <Arthi.Reddy@c-ka.com>
Sent: Friday, December 13, 2024 8:55 AM
To: Jasmine Yuan
Cc: Gordon Moore; Garner Wendy
Subject: RE: Technical Review - O2426 Prysmian Cables and Systems USA, LLC (Renewal, 37080)
Attachments: TCEQ SOP 2426 NOD Response - Replacment Pages -12122024.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Jasmine:

Thank you for your review of the additional information submitted for the above-referenced application to TCEQ on October 30, 2024. On behalf of Prysmian Cables and Systems USA, LLC (Prysmian), C-K Associates (CK) is submitting the following responses (in bold italic format) to your request for additional review questions received on December 2, 2024.

1, I do not see UA15 submitted for unit 60-4. The unit on OP-REQ3 indicates it has index of 111-60SILOS. But I cannot find your UA15. By the way, please follow index number naming instruction and try to use the common index. This is easy for permit reviewers, and region investigators to follow.

Attached OP-UA15 form to address the requirements in Table 1a and b for Chapter 111 for EPN 60-4. The SOP index for the EPN 60-4 has been revised to show 111-604SILO on all forms. Refer to PDF Page #10, 11, 19 and 20 for replacement pages in the attachment.

2, OP-REQ2 does not have GRPBLGCV's permit shield. It listed GRPDHFVENT multiple times. By the way, the regulation name should be MACT FFFF, instead of NESHAP FFFF. Right?

GRPBLGCV has been added and GRP IDs revised to remove the duplicate GRPDHFVENT incorrectly assigned. NESHAP FFFF has been replaced with MACT FFFF wherever applicable. Revised OP-REQ2 replacement pages are attached to this email response. Refer to PDF Pages #3 through 9 for replacement pages in the attachment.

3, GRPCWT will have the same index no. So your original UA13 for cooling towers with different index number is changed to one index 63Q-CWT.

We agree with this representation. The SOP index is changed to 63Q-CWT and the revised pages of OP-UA13 form is attached to this email response Refer to PDF Page #18 for replacement page in the attachment.

4, CL-01-16 PCA on OP-SUMR should be revised as 106.433/09/04/2000[140882]; 106.262/11/01/2003[140882]. Please correct version dates (e.g. 09/04/2000) as I am not sure which one you use.

OP-SUMR has been revised and the correct version date has been included in the updated form OP-SUMR attached with this email response. Refer to PDF Page #12 for replacement page in the attachment.

5, Op-sumr page 9, revision 23, BLG2-CV63, should it be BLG1-CV63?

Correct, Page 9 on Form OP-SUMR has been revised to reflect BLG1-CV63. Revised information is attached with the email response. Refer to PDF Page #13 for the replacement page in the attachment.

6, OP-REQ2 has GRPBLGFUG permit shield. But I do not see GRPBLGFUG in OP-SUMR, not sure which units belongs to this group.

OP-REQ2 form has been revised to match Group ID Nos in Form OP-SUMR. Updated form OP-REQ is included with this submittal. GRPBLGFUG has been replaced to match the GRP IDs in both forms OP-REQ2 and OP-SUMR and as represented in the pending NSR Permit #177396. Refer to PDF Page # 3 through 9 in the attachment for replacement pages.

7, You did not include 106.262 /09/04/2000 in OP-REQ1 PBR list. However, in the unit PCA list, unit CABLE MANUFACT is under 106.262/09/04/2000. Do you want to remove 262/09/04/2000 from unit PCA or add it to OPR-EQ1 list?

We will keep the CABLE MANUFACT as it is. The unit has been added to the revised OP-REQ1 (Section I) and the OP- PBR SUP form - Table B. There are no changes in the unit attributes for negative applicability. Refer to PDF Page #2, and 15 in the attachment for replacement page.

Additionally, we have included Exemption 12209 in Section H of the OP-REQ1 as this exempted source was identified during the NSR Permit #177396 review process. Revised list is attached with this email response. Refer to PDF Page #1 in the attachment for replacement page.

7, It seems PBR106.221, 106.227, 106.452 are not included in the OP-PBR SUP. Please revise the forms.

EPN CJ-01-2016, CV-01-16 and CV-02-16 are authorized under PBR 106.221. These sources are being consolidated under the new project pending under NSR Permit #177396.; these PBRs will be superseded and voided upon the issuance of the above referenced NSR Permit. Therefore, PBR 106.221 is not included in the OP-PBR SUP form.

PBR 106.227 and 106.452 are included in Table C of the OP-PBR SUP. The revised information is included in this submittal. Refer to PDF Page #16 for replacement page.

Additionally, with this submittal, we are including four (4) new emission points associated with the addition of process water cooling loop to correspond with addendum submitted to TCEQ on 09/19/2024 for the pending NSR Permit # 177396

currently under TCEQ review. The addition of process wastewater cooling loop was included to separate process water from non-contact cooling water used in the cooling towers. The emissions due to the addition of the process water cooling loop will be limited to the four (4) 20,000 gallon open-top storage tanks that will be used for receiving and holding the contact cooling water.

The four (4) 20,000-gallon open-top tanks (EPN PWCL-1; FINs WWT-1, WWT-2, WWT-3, and WWT-4) have a relatively high throughput, based on the 1200 gpm non-contact cooling water loop and will normally be operated at near full levels to provide surplus capacity for the operations.

Updated pages for OP-REQ2, -2; OP-SUMR; and OP-2 are included to address these emission points Refer to PDF Page #8, 9,12, and 14.

We appreciate your consideration of the responses provided. If there are follow-up questions or if any additional information is required, please contact me at 361-228-5318 (Arthi.reddy@c-ka.com) or Gordon Moore at Gordon.moore@c-ka.com. The facility contact for this permit action is Wendy Garner, (wendy.garner@prysmian.com)

Sincerely,
Arthi Reddy
Sr. Scientist



From: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>
Sent: Monday, December 2, 2024 1:43 PM
To: Arthi Reddy <Arthi.Reddy@c-ka.com>
Cc: Gordon Moore <gordon.moore@c-ka.com>
Subject: RE: Technical Review - O2426 Prysmian Cables and Systems USA, LLC (Renewal, 37080)

I have reviewed your responses. Here are additional items

1, I do not see UA15 submitted for unit 60-4. The unit on OP-REQ3 indicates it has index of 111-60SILOS. But I cannot find your UA15. By the way, please follow index number naming instruction and try to use the common index. This is easy for permit reviewers, and region investigators to follow.

2, OP-REQ2 does not have GRPBLGCV's permit shield. It listed GRPDHFVENT multiple times. By the way, the regulation name should be MACT FFFF, instead of NESHAP FFFF. Right?

3, GRPCWT will have the same index no. So your original UA13 for cooling towers with different index number is changed to one index 63Q-CWT.

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

Date:	10/29/2024
Permit No.:	O-2426
RN No.:	RN100236017

For SOP applications, answer ALL questions unless otherwise directed.

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

◆ 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.: 177396	Issuance Date: Pending	Authorization No.:	Issuance Date:
Authorization No.: 12209	Issuance Date: 01/07/1981	Authorization No.:	Issuance Date:

XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)

I. Permits by Rule (30 TAC Chapter 106) for the Application Area

A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.

Please refer to the Attachment OP-REQ1-Page88-I

PBR No.:	008	Version No./Date:	05/8/1972
PBR No.:	034	Version No./Date:	07/20/1992
PBR No.:	036	Version No./Date:	03/15/1985
PBR No.:	039	Version No./Date:	03/15/1985
PBR No.:	059	Version No./Date:	05/8/1972
PBR No.:	059	Version No./Date:	03/15/1985
PBR No.:	070	Version No./Date:	03/15/1985
PBR No.:	083	Version No./Date:	03/15/1985
PBR No.:	089	Version No./Date:	09/23/1982
PBR No.:	102	Version No./Date:	07/20/1992
PBR No.:	103	Version No./Date:	03/15/1985
PBR No.:	106	Version No./Date:	07/20/1992
PBR No.:	106.103	Version No./Date:	09/04/2000
PBR No.:	106.183	Version No./Date:	09/04/2000
PBR No.:	106.221	Version No./Date:	09/04/2000
PBR No.:	106.227	Version No./Date:	09/04/2000
PBR No.:	106.266	Version No./Date:	09/04/2000
PBR No.:	106.317	Version No./Date:	09/04/2000
PBR No.:	106.391	Version No./Date:	09/04/2000
PBR No.:	106.433	Version No./Date:	09/04/2000
PBR No.:	106.452	Version No./Date:	09/04/2000
PBR No.:	106.454	Version No./Date:	11/1/2001
PBR No.:	106.511	Version No./Date:	09/04/2000
PBR No.:	106.261	Version No./Date:	11/1/2003
PBR No.:	106.261	Version No./Date:	11/1/2003
PBR No.:	106.261	Version No./Date:	11/1/2003
PBR No.:	107.262	Version No./Date:	9/4/2000

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

Date	Permit No.	Regulated Entity No.
12/2/2024	O-2426	RN100236017

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
A	14 15 16 17 18 19 20	GRPDHFVENT	OP-REQ2	MACT FFFF	§63.2435(b)	Prysmian produces insulated aluminum cables and does not produce any of the organic chemical products listed in 40 CFR §2435(b). Therefore, there is no MCPU located at the site.
A	21 22 23 24 25 26 27	GRPBLGCV	OP-REQ2	MACT FFFF	§63.2435(b)	Prysmian produces insulated aluminum cables and does not produce any of the organic chemical products listed in 40 CFR §2435(b). Therefore, there is no MCPU located at the site.
A	28 29 30 31 32 33 34	GRPFUGCV	OP-REQ2	MACT FFFF	§63.2435(b)	Prysmian produces insulated aluminum cables and does not produce any of the organic chemical products listed in 40 CFR §2435(b). Therefore, there is no MCPU located at the site.

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

Date	Permit No.	Regulated Entity No.
12/2/2024	O-2426	RN100236017

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
A	35 36 37 38 39	GRPBLGJ	OP-REQ2	MACT FFFF	§63.2435(b)	Prysmian produces insulated aluminum cables and does not produce any of the organic chemical products listed in 40 CFR §2435(b). Therefore, there is no MCPU located at the site.
A	40 41 42 43 44	GRPFUGJ	OP-REQ2	MACT FFFF	§63.2435(b)	Prysmian produces insulated aluminum cables and does not produce any of the organic chemical products listed in 40 CFR §2435(b). Therefore, there is no MCPU located at the site.
A	45 46	GRPBLGM	OP-REQ	MACT FFFF	§63.2435(b)	Prysmian produces insulated aluminum cables and does not produce any of the organic chemical products listed in 40 CFR §2435(b). Therefore, there is no MCPU located at the site.
A	47 48	GRPFUGM	OP-REQ	MACT FFFF	§63.2435(b)	Prysmian produces insulated aluminum cables and does not produce any of the organic chemical products listed in 40 CFR §2435(b). Therefore, there is no MCPU located at the site.

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

Date	Permit No.	Regulated Entity No.
12/2/2024	O-2426	RN100236017

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
A	14 15 16 17 18 19 20	GRPDHFVENT	OP-REQ2	MACT FFFF	§63. 2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer
A	21 22 23 24 25 26 27	GRPBLGCV	OP-REQ2	MACT FFFF	§63. 2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer
A	28 29 30 31 32 33 34	GRPFUGCV	OP-REQ	MACT FFFF	§63. 2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer

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

Date	Permit No.	Regulated Entity No.
12/2/2024	O-2426	RN100236017

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
A	35 36 37 38 39	GRPBLGJ	OP-REQ2	MACT FFFF	§63. 2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer
A	40 41 42 43 44	GRPFUGJ	OP-REQ2	MACT FFFF	§63. 2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer
A	45 46	GRPBLGM	OP-REQ2	MACT FFFF	§63. 2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer

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

Date	Permit No.	Regulated Entity No.
12/2/2024	O-2426	RN100236017

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
A	47 48	GRPFUGM	OP-REQ2	MACT FFFF	§63. 2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer
A	49 50	GRPCWT	OP-UA13	MACT FFFF	§63. 2435(c)(4)	Prysmian produces insulated aluminum cables and does not produce any of the organic chemical products listed in 40 CFR §2435(b). Therefore, there is no MCPU located at the site.
A	49 50	GRPCWT	OP-UA13	MACT FFFF	§63. 2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer

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

Date	Permit No.	Regulated Entity No.
12/2/2024	O-2426	RN100236017

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
D	60	COOL 1	OP-REQ2	MACT Q	§63.400(a)	The cooling tower does not operate with chromium-based water treatment chemicals.
A	61	CL-01-16	OP-UA18	MACT MMMM	§63.3881(c)(5)	This subpart does not apply to surface coating operations where plastic is extruded onto a metal wire or cable or metal parts or products to form a coating.
A	62 63 64 65	GRPWWTCL	OP-REQ2	MACT FFFF	§63. 2435(c)(4)	Prysmian produces insulated aluminum cables and does not produce any of the organic chemical products listed in 40 CFR §2435(b). Therefore, there is no MCPU located at the site. The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer

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

Date	Permit No.	Regulated Entity No.
12/2/2024	O-2426	RN100236017

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
A	62 63 64 65	GRPWWTCL	OP-REQ2	MACT F MACT G	§63.100 §63.110(a)	Prysmian produces insulated aluminum cables and does meet all the criteria in 40 CFR §63.100(b). This is not a SOCMF facility. Therefore, the facility is not subject to the requirements in MACT F and G.
A	62 63 64 65	GRPWWTCL	OP-REQ2	MACT FFFF	§63. 2435(c)(4)	Prysmian produces insulated aluminum cables and does not produce any of the organic chemical products listed in 40 CFR §2435(b). Therefore, there is no MCPU located at the site. The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer

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

Table 1b: Additions

Date: 12/2/2024	Regulated Entity No.: RN100236017	Permit No.: O-2426
Company Name: Prysmian Cables and Systems USA LLC	Area Name: Marshall Plant	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
13	60-4	111-604SILO	PM(OPACITY)	[G]§111.111(a)(1)(F) Periodic Monitoring	None	None
52	EMGCYGEN	60JJJ-01	CO NO _x VOC	§60.4243(b)(2), (e)-(g) §60.4237(a), (b) §60.4244(a)-(e)	§60.4243(a)(1) §60.4245(a)(1)-(4), (b)	§60.4245(b), [G](c), (d), [G](e)

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

Table 1a: Additions

Date: 12/2/2024	Regulated Entity No.: RN100236017	Permit No.: O-2426
Company Name: Prysmian Cables and Systems USA LLC	Area Name: Marshall 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)
13	60-4	OP-UA15	111-604SILO	PM (OPACITY)	Chapter 111	§111.111(a)(1)(B)
52	EMGCYGEN	OP-UA2	60JJJJ-01	CO NOx VOC	NSPS JJJJ	§60.4233(e)-Table 1 §60.4243(a)(1)-(2), (a)(2)(ii), (a)(2)(iii), (b) §60.4243(b)(1)-(2), (b)(2)(i), (b)(2)(ii), [G](d) §60.4234

**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.
12/4/2024	O-2426	RN100236017

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Proce ss CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
A	61	CL-01-16	OP-UA18	Cable Labeling		106.433/09/04/2000[14 0882]	
A	62	WWT-1	OP- UA1/REQ2	Process Wastewater Cooling Loop Storage Tank		177396 (Pending)	
A	63	WWT-2	OP- UA1/REQ2	Process Wastewater Cooling Loop Storage Tank		177396 (Pending)	
A	64	WWT-3	OP- UA1/REQ2	Process Wastewater Cooling Loop Storage Tank		177396 (Pending)	
A	65	WWT-4	OP- UA1/REQ2	Process Wastewater Cooling Loop Storage Tank		177396 (Pending)	

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

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

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

[Table 2](#)

Date	Permit No.	Regulated Entity No.
10/29/2024	O-2426	RN100236017

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.
14 15 16 17 18 19 20	CV1-61 CV1-62 CV1-63 CV2-66 CV2-67 CV2-68 CV2-69	OP-REQ2	A	GRPDHFVENT
21 22 23 24 25 26 27	BLG1-CV61 BLG1-CV62 BLG1-CV63 BLG2-CV66 BLG2-CV67 BLG2-CV68 BLG2-CV69	OP-REQ2	A	GRPBLGCV

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

[Table 2](#)

Date	Permit No.	Regulated Entity No.
12/2/2024	O-2426	RN100236017

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.
45 46	BLG1-M64 BLG1-M65	OP-REQ2	A	GRPBLGM
47 48	FUG1-M64 FUG1-M64	OP-REQ2	A	GRPFUGM
49 50	CWT-1 CWT-2	OP-UA13	A	GRPCWT
62 63 63 64	WWT-1 WWT-2 WWT-3 WWT-4	OP-REQ2	A	GRPWWTCL

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
12/4/2024	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date
ANNEAL01	106.183	09/04/2000
1012	059	05/08/1972
1013	059	05/08/1972
1014	059	05/08/1972
1016	059	05/08/1972
1017	059	05/8/1972
BLDG-2	089	11/01/2001
1003	106.261	11/01/2003
1008	106.261	11/01/2003
CABLE MANUFACT	106.261	11/01/2003
CABLE MANUFACT	106.262	09/04/2000

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

Date	Permit Number	Regulated Entity Number
10/29/2024	O-2426	RN100236017

PBR No.	Version No./Date
008	05/08/1972
034	07/20/1992
036	03/15/1985
039	03/15/1985/
059	05/08/1972
059	03/15/1985
070	03/15/1985
083	03/15/1985
089	09/23/1982
102	07/20/1992
103	03/15/1985
106.227	09/04/2000
106.452	09/04/2000

Form OP-2-Table 2
Texas Commission on Environmental Quality

Date: 12/4/2024
Permit No.: O-2426
Regulated Entity No.: RN100236017
Company Name: Prysmian Cables and Systems USA LLC

			Unit/Group	Process		
Revision No.	Revision Code	New Unit	ID No.	Applicable Form	NSR Authorization	Description of Change and Provisional Terms and Conditions
62 63 64 65	SIG-E	Yes	GRPWWTCL	OP-REQ2	177396 (Pending)	Adding four (4) open-top 20,000 bbl storage tank to support the process water from the process water cooling loop.

**Texas Commission on Environmental Quality
Cooling Tower Attributes
Form OP-UA13 (Page 1)**

Federal Operating Permit Program

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

Subpart Q: National Emission Standards for Hazardous Air Pollutants (HAPs) for Industrial Process Cooling Towers

Date	Permit No.:	Regulated Entity No.
12/4/2024	O-2426	RN100236017

Unit ID No.	SOP Index No.	Used Compounds Containing Chromium on or After September 8, 1994	Initial Start-up Date
CWT-1	63Q-CWT	NO	
CWT-2	63Q-CWT	NO	

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

Date	Permit No.	Regulated Entity No.
12/2/2024	0-2426	RN100236017

Emission Point ID No.	SOP/GOP Index No.	Alternate Opacity Limitation	AOL ID No.	Vent Source	Opacity Monitoring System	Construction Date	Effluent Flow Rate
60-4	111-604SILO	NO		OTHER	EDEX	72+	100-

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 2)
Federal Operating Permit Program
Table 1b: Title 30 Texas Administrative Code Chapter 111 (30 TAC Chapter 111)
Subchapter A: Visible Emissions
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
12/2/2024	O-2426	RN100236017

Emission Point ID No.	SOP Index No.	Annual ACF	Heat Input	State Implementation Plan (SIP) Violation	Total Feed Capacity
60-4	111-604SILO				

Jasmine Yuan

From: Jasmine Yuan
Sent: Monday, December 2, 2024 1:43 PM
To: Arthi Reddy
Cc: Gordon Moore
Subject: RE: Technical Review - O2426 Prysmian Cables and Systems USA, LLC (Renewal, 37080)

I have reviewed your responses. Here are additional items

1, I do not see UA15 submitted for unit 60-4. The unit on OP-REQ3 indicates it has index of 111-60SILOS. But I cannot find your UA15. By the way, please follow index number naming instruction and try to use the common index. This is easy for permit reviewers, and region investigators to follow.

2, OP-REQ2 does not have *GRPBLGCV's permit shield*. It listed *GRPDHFVENT* multiple times. By the way, the regulation name should be *MACT FFFF*, instead of *NESHAP FFFF*. Right?

3, GRPCWT will have the same index no. So your original UA13 for cooling towers with different index number is changed to one index 63Q-CWT.

4, CL-01-16 PCA on OP-SUMR should be revised as 106.433/09/04/2000[140882]; 106.262/11/01/2003[140882]. Please correct version dates (e.g. 09/04/2000) as I am not sure which one you use.

5, Op-sumr page 9, revision 23, BLG2-CV63, should it be BLG1-CV63?

6, OP-REQ2 has GRPBLGFUG permit shield. But I do not see GRPBLGFUG in OP-SUMR, not sure which units belongs to this group.

7, You did not include 106.262 /09/04/2000 in OP-REQ1 PBR list. However, in the unit PCA list, unit CABLE MANUFACT is under 106.262/09/04/2000. Do you want to remove 262/09/04/2000 from unit PCA or add it to OPR-EQ1 list?

7, It seems PBR106.221, 106.227, 106.452 are not included in the OP-PBR SUP. Please revise the forms.

Please respond by this email by 12/13.

Thank you!

Jasmine

From: Arthi Reddy <Arthi.Reddy@c-ka.com>
Sent: Wednesday, October 30, 2024 3:38 PM
To: Jasmine Yuan <Jasmine.Yuan@tceq.texas.gov>
Cc: Gordon Moore <gordon.moore@c-ka.com>
Subject: RE: Technical Review - O2426 Prysmian Cables and Systems USA, LLC (Renewal, 37080)

Hi Jasmine:

You should receive an email from Ms. Wendy Garner with our responses to the NOD shortly. We re-worked some of the main forms with more details to address the items in the NOD and stay consistent with the PBR authorizations and the pending NSR Project.

From: Garner Wendy <wendy.garner@prysmian.com>
Sent: Wednesday, October 30, 2024 3:42 PM
To: Jasmine Yuan
Cc: Gordon.Moore@c-ka.com; R6AirPermitsTX@epa.gov
Subject: Technical Review - O2426 Prysmian Cables and Systems USA, LLC (Renewal, 37080)
Attachments: Attachment 2 - OP-UA2.pdf; Attachment 3- OP-UA5.pdf; Attachment 4 - OP-SUMR.pdf; Attachment 5-OP-REQ1-Page 87-89.pdf; Attachment-REP FORMS.pdf; Attachment 1- OP-PBR SUP.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

Hi Jasmine,

We have prepared a response to the deficiencies noted in your October 16, 2024 email. The narrative for the responses is in red below and there are attachments to address the responses.

1. OP-PBR SUP should have Table C and D. All units on Table A and B should be listed on Table D. Redate the updated form. You can leave the Table C blank if no insignificant sources under PBR. The OP-PBR SUP Table A, B, and C have been updated as per the OP-REQ1-Page 89 Section I. This includes all the registered, unregistered PBR claims including insignificant sources claimed under various exemptions as listed in Table C of OP-PBR SUP. Table D has been updated to include the required monitoring and recordkeeping requirements for each registered PBR claim identified in Table A. The revised OP-PBR SUP is included as Attachment 1-OP PBR SUP, which addresses the PBRs proposed to remain current after the pending NSR Permit #177396 is issued.

2. In your current permit, you have an emergency engine, EMGCYGEN, with MACT ZZZZ applicability Index 63ZZZZ-01. Please confirm your UA2 for MACT ZZZZ is to update the existing requirements. For example, the attributes current is Major for HAP source code, now on UA2 you change it to Area. Brake HP is now 250-300. Your UA2 has 100-250. Shall I change the current ones to new ones on UA2?

The application area is still a major source of HAPs. The proposed engine in the application is an in-kind replacement with less horsepower and similar or less emissions. The changing attribute is the Brake HP which in the OP-UA2 form is correctly shown as 100-250. However, the source type was listed as "AREA" which is incorrect. Also, as per 40 CFR 60.63590(a)(2)(ii) and 40 CFR 60.63590(c)(6), engines with horsepower less than 500 and located at a major source of HAPs must meet the requirements in 40 CFR 60 Subpart JJJJ for spark ignition engines and no further requirements apply for such engines under this Subpart ZZZZ.

Based on the explanation above, we have updated the OP-UA2 form to reflect the new applicable requirements for the new engine EMGCYGEN and proposed to remove the ZZZZ requirements in the revised OP-2 form. The updated OP-UA2 forms are included as Attachment 2 – OP-UA2. Please change the current attributes to new ones as per the revised OP-UA2.

3. You have ANNEAL01 on UA6 in your application. However, it is currently on UA5 with MACT 5D manual build requirement. Please follow UA5 OR 6 instructions, and update the form as needed. Check

your current permit and see if previous manual build is still valid. Let me know if you want to remove the previous manual build and move the unit to UA6 and have the new requirements. Revise the UA forms as needed. If you decide to use UA5, please re-fill the UA5 MACT 5D table.

The applicable form ANNEAL01 is OP-UA5. The ANNEAL01 emission source is a process heater and therefore the correct applicable form is OP-UA5. We have included an updated OP-UA5 form and updated Table 6a-6g as per the new applicable requirements and instructions in the form. Please incorporate the same previous manual build permit conditions in the current permit moving forward as all the requirements remain the same for ANNEAL01. The revised version of the form is included as Attachment 3- OP-UA5.

4. Please follow OP-SUMR instruction to revise the form. You cannot add group itself without unit ID in it. The group needs to have individual units. The units have the same requirements, permit shields, then they can be grouped. OP-SUMR table 1 need to be unit ID, table 2 add the unit ID into groups. If it is a unit, it cannot be named as GPRXXXX. GRP is only for group. Redate the form after revision.

A revised OP-SUMR is provided as Attachment 4 - OPSUMR. Emissions sources have been added and/or deleted to reflect the pending NSR Permit #177396 and PBRs that are currently being claimed by the facility. The form has been updated based on the instructions. Emission sources that are being added or deleted are listed individually in Table 1 and sources with the same requirements and permit shields have been grouped together in Table 2.

5. PBRs on OP-PBRSUP need to match PBRs on OP-REQ1 Page 87-88. For example, OP-PBRSUP Table A has 106.261, 106. 433, Table B has 102. These needs to be included in OP-REQ1 Page 88 PBR list. 106.472 Version date needs to be figured out, either 09/04/2000 or 03/14/1997. Please follow our instruction to revise the form. OP-REQ1, PAGE 88, 106.511 VERSION DATE 07/06/2022 is wrong. It should be either 1997 or 2000, check the rule please. When you list the PBR, no need to list the name, just 106.511, 106.454.

A list of PBRs registered, unregistered and exemptions claimed are provided in Attachment 1 – OP-PBRSUP. Additionally, Page 87-88 is shown as Page 88-89 on the OP-REQ 1 form that was submitted in the application. Page # 88 (Section H) and Page 89 PBR List (Section I) in OP-REQ1 have been revised accordingly to address Item #5 as per the instructions in this form. A supplement is included as Attachment 5- OP-REQ1-Page 87-89 to address the information required in Item 5 on OP-REQ1 form. Revised Page # 87-88 in OP-REQ1 are being submitted as replacement pages.

6. Remove registered PBRs in REQ1, Section H, page 87. This section is not meant for PBRs. It is for NSR, Standard permit. You should list the pending NSR 177396, leave issuance date as pending.

Page # 87 through 89 in Form OP-REQ1 has been updated to incorporate Item #6 above and the revised pages are provided as Attachment 5- OP-REQ1-Page 87-89.

7. Your site has 111492, 111493, which should be listed on OP-REQ1 Page 87 Part H. You can double check your current permit and see all PCA list. You renewal application PCA information on OP-REQ1 should be complete, not just part of PCA list. Please revise all PCA information.

111492 and 111493 are Standard Exemptions. As per the instructions in the OP-REQ1 Form for Section H, only authorization numbers for 30 TAC 116 Permits, special permit, standard permits, and other NSR authorizations are to be provided. As these authorizations are standard exemptions, we have included these in Section I, Page # 89, in the revised pages for OP-REQ1 form. Replacement pages including an additional sheet to include a list of PBRs, and standard exemption are provided in Attachment 5- OP-REQ1-Page 87-89.

8. All registered PBRs need to go to OP-SUMR, and OP-PBRSUP associated with unit ID. When you list the PBR information follow the guidance/instruction in the form to format the PBR, It should be Unit XXX, 106.261/09/04/2000[74613]. All forms OP-REQ1 Page 88, OP-SUMR, and OP-PRBSUP should match each other.

OP-SUMR has been revised to incorporate Item #8. A list of PBRs and Standard Exemption that are being revised, added and/or removed with this SOP renewal and the pending NSR Permit #177396 are being addressed in the revised OP-SUMR provided as Attachment 4- OP-SUMR and OP-PBRSUP which is included as Attachment 1-OP-PBRSUP.

Additionally, we have included replacement pages for Forms OP-2; OP-REQ2, OP-REQ3 and OP-UA13 for consistency with forms that are being revised to address Items 1 through 8 in this submittal. The replacement pages are provided in Attachment- REP FORMS.

Thank you for the thorough review and comments. We would be pleased to discuss this further as needed.

Wendy Garner

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

Date: 10/29/2024	
Permit No.: O-2426	
Regulated Entity No.: RN100236017	
Company Name: Prysmian Cables and Systems USA LLC	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
I. Application Type	
Indicate the type of application:	
<input checked="" type="checkbox"/> Renewal	
<input type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
<input type="checkbox"/> Significant Revision	
<input type="checkbox"/> Revision Requesting Prior Approval	
<input type="checkbox"/> Administrative Revision	
<input type="checkbox"/> Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
For GOP Revisions Only <input type="checkbox"/> YES <input type="checkbox"/> NO	

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

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

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

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

Other:

IV. Reference Only Requirements (For reference only)

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

V. Delinquent Fees and Penalties

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

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

Date: 10/29/2024
Permit No.: O-2426
Regulated Entity No.: RN100236017
Company Name: Prysmian Cables and Systems USA LLC

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

Revision No.	Revision Code		Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
1	SIG-A	No	AF-01-16	OP-UA60	140882	Delete Unit ID No. AF-01-16. AF-01-16 encompasses multiple emission points that require separate ID numbers. Delete requirements for 40 CFR 63 Subpart FFFF, as this subpart is not applicable
2	SIG-E	No	54	OP-REQ2	84132	The emission source currently authorized under PBR authorization will be consolidated under the pending NSR Permit #177396 and voided upon issuance of the initial NSR Permit
3	SIG-E	No	54	OP-REQ2	82175	The emission source currently authorized under PBR authorization will be consolidated under the pending NSR Permit #177396 and voided upon issuance of the initial NSR Permit
4	SIG-E	No	65	OP-REQ2	76750	The emission source currently authorized under PBR authorization will be consolidated under the pending NSR Permit #177396 and voided upon issuance of the initial NSR Permit
5	SIG-E	No	60	OP-REQ2	47214	The emission source currently authorized under PBR authorization will be consolidated under the pending NSR Permit #177396 and voided upon issuance of the initial NSR Permit
6	SIG-E	No	FLAT	OP-REQ2	47195	The emission source currently authorized under PBR authorization will be consolidated under the pending NSR Permit #177396 and voided upon issuance of the initial NSR Permit
7	SIG-E	No	57	OP-REQ2	111492	The emission source currently authorized under PBR authorization will be consolidated under the pending NSR Permit #177396 and voided upon issuance of the initial NSR Permit

8	SIG-E	No	VULCUNIZATI ON LINE	OP-REQ2	111493	The emission source currently authorized under PBR authorization will be consolidated under the pending NSR Permit #177396 and voided upon issuance of the initial NSR Permit
9	SIG-E	No	CJ-01-2016	OP-REQ2	106.221	The emission source currently authorized under PBR authorization will be consolidated under the pending NSR Permit #177396 and voided upon issuance of the initial NSR Permit
10	SIG-E	No	CV-01-16	OP-REQ2	106.221	The emission source currently authorized under PBR authorization will be consolidated under the pending NSR Permit #177396 and voided upon issuance of the initial NSR Permit
11	SIG-E	No	CV-02-16	OP-REQ2	106.221	The emission source currently authorized under PBR authorization will be consolidated under the pending NSR Permit #177396 and voided upon issuance of the initial NSR Permit
12	SIG-E	No	CT-01-16	OP-REQ2	106.371	The emission source currently authorized under PBR authorization will be consolidated under the pending NSR Permit #177396 and voided upon issuance of the initial NSR Permit
13	SIG-E	Yes	60-4	OP-REQ2	177396 (Pending)	The emission source is being added and pending under NSR Permit #177396.
14 15 16 17 18 19 20	SIG-E	Yes	GRPDHFVENT	OP-REQ2	177396 (Pending)	Add new emission points under pending NSR Permit #177396. Emission points were previously included in ID No. AF-01-16 and various PBRs which are now being deleted These new emission sources IDs are not subject to 40 CFR 63 FFFF.

21 22 23 24 25 26 27	SIG-E	Yes	GRPBLGCV	OP-REQ2	177396 (Pending)	Add new emission points under pending NSR Permit #177396. Emission points were previously included in ID No. AF-01-16 and various PBRs which are now being deleted These new emission sources IDs are not subject to 40 CFR 63 FFFF.
28 29 30 31 32 33 34	SIG-E	Yes	GRPFUGCV	OP-REQ2	177396 (Pending)	Add new emission points under pending NSR Permit #177396. Emission points were previously included in ID No. AF-01-16 and various PBRs which are now being deleted These new emission sources IDs are not subject to 40 CFR 63 FFFF.
35 36 37 38 39	SIG-E	Yes	GRPBLGJ	OP-REQ2	177396 (Pending)	Add new emission points under pending NSR Permit #177396. Emission points were previously included in ID No. AF-01-16 and various PBRs which are now being deleted These new emission sources IDs are not subject to 40 CFR 63 FFFF.
40 41 42 43 44	SIG-E	Yes	GRPFUGJ	OP-REQ2	177396 (Pending)	Add new emission points under pending NSR Permit #177396. Emission points were previously included in ID No. AF-01-16 and various PBRs which are now being deleted These new emission sources IDs are not subject to 40 CFR 63 FFFF.

45 46	SIG-E	Yes	GRPBLGM	OP-REQ2	177396 (Pending)	Add new emission points under pending NSR Permit #177396. Emission points were previously included in ID No. AF-01-16 and various PBRs which are now being deleted These new emission sources IDs are not subject to 40 CFR 63 FFFF.
47 48	SIG-E	Yes	GRPFUGM	OP-REQ2	177396 (Pending)	Add new emission points under pending NSR Permit #177396. Emission points were previously included in ID No. AF-01-16 and various PBRs which are now being deleted These new emission sources IDs are not subject to 40 CFR 63 FFFF.
49	SIG-E	No	CWT-1	OP-UA13	177396 (Pending)	This is an existing emission source COOL-1 previously authorized under PBR 106.371 as The source is being included under pending NSR Permit #177396 as CWT-1 and is not subject to the requirements in NESHAP FFFF and NESHAP Q
50	SIG-E	Yes	CWT-2	OP-UA13	177396 (Pending)	This is a new source added under pending NSR Permit #177396 as CWT-2 and is not subject to the requirements in NESHAP FFFF and NESHAP Q
51	SIG-E	Yes	MIS-MSS	OP-REQ2	177396 (Pending)	Miscellaneous MSS activities are being as part of the pending proposed project NSR Permit # 177396 currently under review
52	SIG-E	Yes	EMGCYGEN	OP-UA2	PBR 106.511	Add requirements for 40 CFR 60 Subpart JJJJ. New emergency generator was installed on 07/06/2022 and is subject to 40 CFR 60 Subpart JJJJ and 40 CFR 63 Subpart ZZZZ. The engine must comply with the requirements in NSPS JJJJ to show compliance under NESHAP ZZZZ

53	SIG-E	No	EMGCYGEN	OP-UA2	PBR 106.511	Remove requirement under NESHAP ZZZZ as the engine was replaced and no longer in service.
54	SIG-E	No	M-EXTRUSION	OP-REQ2	010	The emission source currently authorized under PBR authorization will be consolidated under the pending NSR Permit #177396 and voided upon issuance of the initial NSR Permit
55	SIG-E	No	EXTRUSION	OP-REQ2	010	The emission source currently authorized under PBR authorization will be consolidated under the pending NSR Permit #177396 and voided upon issuance of the initial NSR Permit
56	SIG-E	No	EXTRUSION	OP-REQ2	010	The emission source currently authorized under PBR authorization will be consolidated under the pending NSR Permit #177396 and voided upon issuance of the initial NSR Permit
57	SIG-E	No	EXTRUSION	OP-REQ2	010	The emission source currently authorized under PBR authorization will be consolidated under the pending NSR Permit #177396 and voided upon issuance of the initial NSR Permit
58	SIG-E	No	EXTRUSION	OP-REQ2	010	The emission source currently authorized under PBR authorization will be consolidated under the pending NSR Permit #177396 and voided upon issuance of the initial NSR Permit
59	SIG-E	No	JACKET	OP-REQ2	010	The emission source currently authorized under PBR authorization will be consolidated under the pending NSR Permit #177396 and voided upon issuance of the initial NSR Permit
60	SIG-E	No	COOL-1	OP-REQ2	PBR 106.371	Delete emissions and associated permit shield
61	SIG-E	No	CL-01-16	OP-UA18	140882	Add negative applicability for the emission source in OP-REQ2 form. This is an existing source, and negative applicability is included for NESHAP MMMM. The source is not subject to the requirements in this subpart.

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

Date: 08/30/2024	
Permit No.: O-2426	
Regulated Entity No.: RN100236017	
Company Name: Prysmian Cables and Systems USA LLC	
I. Significant Revision <i>(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)</i>	
A. Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
B. Indicate the alternate language(s) in which public notice is required: Spanish	
C. Will, there be a change in air pollutant emissions as a result of the significant revision?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

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

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

Pollutant	Description of the Change in Pollutant Emissions
Volatile Organic Compounds – ACETOPHENONE	Increase in air emissions due to plant expansion of new production lines known as the Windstar/LoneStar Project and increase in production rates associated with the existing process line, known as the PreLonestar Project.
Volatile Organic Compounds -Methanol	Increase in air emissions due to plant expansion of new production lines known as the Windstar/LoneStar Project and increase in production rates associated with the existing process line, known as the PreLonestar Project.
Particulate Matter	Increase in air emissions due to plant expansion of new production lines known as the Windstar/LoneProject and increase in production rates associated with the existing process line, known as the PreLonestar Project.
Particulate Matter 2.5	Increase in air emissions due to plant expansion of new production lines known as the Windstar/LoneStar Project and increase in production rates associated with the existing process line, known as the PreLonestar Project.
Particulate Matter 10	Increase in air emissions due to plant expansion of new production lines known as the Windstar/LoneStar Project and increase in production rates associated with the existing process line, known as the PreLonestar Project.

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

Date	Permit No.	Regulated Entity No.
10/29/2024	O-2426	RN100236017

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
A	14	GRPDHFVENT	OP-REQ2	NESHAP FFFF	§63.2435(b)	Prysmian produces insulated aluminum cables and does not produce any of the organic chemical products listed in 40 CFR §2435(b). Therefore, there is no MCPU located at the site.
	15					
	16					
	17					
	18					
	19					
	20					
A	21	GRPDHFVENT	OP-REQ2	NESHAP FFFF	§63.2435(b)	Prysmian produces insulated aluminum cables and does not produce any of the organic chemical products listed in 40 CFR §2435(b). Therefore, there is no MCPU located at the site.
	22					
	23					
	24					
	25					
	26					
	27					
A	28	GRPFUGCV	OP-REQ	NESHAP FFFF	§63.2435(b)	Prysmian produces insulated aluminum cables and does not produce any of the organic chemical products listed in 40 CFR §2435(b). Therefore, there is no MCPU located at the site.
	29					
	30					
	31					
	32					
	33					
	34					

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

Date	Permit No.	Regulated Entity No.
10/29/2024	O-2426	RN100236017

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
A	35 36 37 38 39	GRPBLGJ	OP-REQ2	NESHAP FFFF	§63.2435(b)	Prysmian produces insulated aluminum cables and does not produce any of the organic chemical products listed in 40 CFR §2435(b). Therefore, there is no MCPU located at the site.
A	40 41 42 43 44	GRPFUGJ	OP-REQ2	NESHAP FFFF	§63.2435(b)	Prysmian produces insulated aluminum cables and does not produce any of the organic chemical products listed in 40 CFR §2435(b). Therefore, there is no MCPU located at the site.
A	45 46	GRPBLGM	OP-REQ	NESHAP FFFF	§63.2435(b)	Prysmian produces insulated aluminum cables and does not produce any of the organic chemical products listed in 40 CFR §2435(b). Therefore, there is no MCPU located at the site.
A	47 48	GRPFUGM	OP-REQ	NESHAP FFFF	§63.2435(b)	Prysmian produces insulated aluminum cables and does not produce any of the organic chemical products listed in 40 CFR §2435(b). Therefore, there is no MCPU located at the site.

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

Date	Permit No.	Regulated Entity No.
10/29/2024	O-2426	RN100236017

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
A	14	GRPDHFVENT	OP-REQ2	NESHAP FFFF	§63. 2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer
	15					
	16					
	17					
	18					
	19					
	20					
A	21	GRPDHFVENT	OP-REQ2	NESHAP FFFF	§63. 2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer
	22					
	23					
	24					
	25					
	26					
	27					
A	28	GRPFUGCV	OP-REQ	NESHAP FFFF	§63. 2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer
	29					
	30					
	31					
	32					
	33					
	34					

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

Date	Permit No.	Regulated Entity No.
10/29/2024	O-2426	RN100236017

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
A	35 36 37 38 39	GRPBLGJ	OP-REQ2	NESHAP FFFF	§63. 2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer
A	40 41 42 43 44	GRPFUGJ	OP-REQ2	NESHAP FFFF	§63. 2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer
A	45 46	GRPBLGM	OP-REQ	NESHAP FFFF	§63. 2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer

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

Date	Permit No.	Regulated Entity No.
10/29/2024	O-2426	RN100236017

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
A	47 48	GRPFUGM	OP-REQ	NESHAP FFFF	§63. 2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer
A	49 50	GRPCWT	OP-UA13	NESHAP FFFF	§63. 2435(c)(4)	Prysmian produces insulated aluminum cables and does not produce any of the organic chemical products listed in 40 CFR §2435(b). Therefore, there is no MCPU located at the site.
A	49 50	GRPCWT	OP-UA13	NESHAP FFFF	§63. 2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer

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

Date	Permit No.	Regulated Entity No.
10/29/2024	O-2426	RN100236017

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
D	60	COOL 1	OP-REQ2	NESHAP Q	§63.400(a)	The cooling tower does not operate with chromium based water treatment chemicals.
A	61	CL-01-16	OP-UA18	NESHAP MMMM	§63.3881(c)(5)	This subpart does not apply to surface coating operations where plastic is extruded onto a metal wire or cable or metal parts or products to form a coating.

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

Table 1a: Additions

Date: 10/29/2024	Regulated Entity No.: RN100236017	Permit No.: O-2426
Company Name: Prysmian Cables and Systems USA LLC	Area Name: Marshall 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)
13	60-4	OP-UA15	111-60SILO	PM (OPACITY)	Chapter 111	§111.111(a)(1)(B)
52	EMGCYGEN	OP-UA2	60JJJJ-01	CO NOx VOC	NSPS JJJJ	§60.4233(e)-Table 1 §60.4243(a)(1)-(2), (a)(2)(ii), (a)(2)(iii), (b) §60.4243(b)(1)-(2), (b)(2)(i), (b)(2)(ii), [G](d) §60.4234

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

Table 1b: Additions

Date: 10/29/2024	Regulated Entity No.: RN100236017	Permit No.: O-2426
Company Name: Prysmian Cables and Systems USA LLC	Area Name: Marshall Plant	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
13	60-4	OP-UA15	PM(OPACIT Y)	[G]§111.111(a)(1)(F) Periodic Monitoring	None	None
52	EMGCYGEN	OP-UA2	CO NO _x VOC	§60.4243(b)(2), (e)-(g) §60.4237(a), (b) §60.4244(a)-(e)	§60.4243(a)(1) §60.4245(a)(1)-(4), (b)	§60.4245(b), [G](c), (d), [G](e)

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

Table 2a: Deletions

Date: 10/29/24	Regulated Entity No.: RN100236017	Permit No.: O-2426
Company Name: Prysmian Cables and Systems USA LLC	Area Name: Marshall 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	AF-01-16	OP-UA60	63FFFF-01	112(B) HAPS	NESHAP FFFF	§63.2460(a) §63.2450(b) §63.2460(b)
53	EMGCYGEN	OP-UA2	63ZZZZ-01	112(B) HAPS	NESHAP ZZZZ	§ 63.6602- Table2c.1 § 63.6595(a)(1) § 63.6605(a) § 63.6605(b) § 63.6625(e) § 63.6625(h) § 63.6625(i)

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

Table 2b: Deletions

Date: 10/29/2024	Regulated Entity No.: RN100236017	Permit No.: O-2426
Company Name: Prysmian Cables and Systems USA LLC	Area Name: Marshall 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	AF-01-16	OP-UA60	63FFFF-01	112(B) HAPS	[G]§ 63.1257(d)(2)(i) [G]§ 63.1257(d)(2)(ii) § 63.2460(b)(1) § 63.2460(b)(2) § 63.2460(b)(3) [G]§ 63.2460(b)(4) § 63.2460(b)(7)	§ 63.2460(b)(6)(i) § 63.2460(b)(7)	§ 63.2460(b)(6) § 63.2460(b)(6)(i) § 63.2460(b)(6)(ii) § 63.2460(b)(7)

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

Table 2b: Deletions

Date: 10/29/2024	Regulated Entity No.: RN100236017	Permit No.: O-2426
Company Name: Prysmian Cables and Systems USA LLC	Area Name: Marshall 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
53	EMGCYGEN	OP-UA2	63ZZZZ-01	112(B) HAPS	§ 63.6625(f) § 63.6625(i) § 63.6640(a) § 63.6640(a)- Table6.9.a.i § 63.6640(a)- Table6.9.a.ii	§ 63.6625(i) § 63.6655(d) § 63.6655(e) § 63.6655(f) § 63.6660(a) § 63.6660(b) § 63.6660(c)	§ 63.6640(e) § 63.6650(f)

Texas Commission on Environmental Quality

Cooling Tower Attributes

Form OP-UA13 (Page 1)

Federal Operating Permit Program

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

Subpart Q: National Emission Standards for Hazardous Air Pollutants (HAPs) for Industrial Process Cooling Towers

Date	Permit No.:	Regulated Entity No.

Unit ID No.	SOP Index No.	Used Compounds Containing Chromium on or After September 8, 1994	Initial Start-up Date
CWT-1	63Q-CWT1	NO	
CWT-2	63Q-CWT2	NO	

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

Date:	10/29/2024
Permit No.:	O-2426
RN No.:	RN100236017

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 87			
XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)			
E. PSD Permits and PSD Major Pollutants		N/A	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
If PSD Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html .			
F. Nonattainment (NA) Permits and NA Major Pollutants		N/A	
NA Permit No.:	Issuance Date:	Pollutant(s):	
NA Permit No.:	Issuance Date:	Pollutant(s):	
NA Permit No.:	Issuance Date:	Pollutant(s):	
NA Permit No.:	Issuance Date:	Pollutant(s):	
If NA Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html .			
G. NSR Authorizations with FCAA § 112(g) Requirements		N/A	
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:

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

Date:	10/29/2024
Permit No.:	O-2426
RN No.:	RN100236017

For SOP applications, answer ALL questions unless otherwise directed.

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

◆ 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.: 177396	Issuance Date: Pending	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:

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

Date:	10/29/2024
Permit No.:	O-2426
RN No.:	RN100236017

For SOP applications, answer ALL questions unless otherwise directed.

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

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

XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)

I. Permits by Rule (30 TAC Chapter 106) for the Application Area

A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.

Please refer to the Attachment OP-REQ1-Page89-I

PBR No.:	008	Version No./Date:	05/8/1972
PBR No.:	034	Version No./Date:	07/20/1992
PBR No.:	036	Version No./Date:	03/15/1985
PBR No.:	039	Version No./Date:	03/15/1985
PBR No.:	059	Version No./Date:	05/8/1972
PBR No.:	059	Version No./Date:	03/15/1985
PBR No.:	070	Version No./Date:	03/15/1985
PBR No.:	083	Version No./Date:	03/15/1985
PBR No.:	089	Version No./Date:	09/23/1982
PBR No.:	102	Version No./Date:	07/20/1992
PBR No.:	103	Version No./Date:	03/15/1985
PBR No.:	106	Version No./Date:	07/20/1992
PBR No.:	106.103	Version No./Date:	09/04/2000
PBR No.:	106.183	Version No./Date:	09/04/2000
PBR No.:	106.221	Version No./Date:	09/04/2000
PBR No.:	106.227	Version No./Date:	09/04/2000
PBR No.:	106.266	Version No./Date:	09/04/2000
PBR No.:	106.317	Version No./Date:	09/04/2000
PBR No.:	106.391	Version No./Date:	09/04/2000
PBR No.:	106.433	Version No./Date:	09/04/2000
PBR No.:	106.452	Version No./Date:	09/04/2000
PBR No.:	106.454	Version No./Date:	11/1/2001
PBR No.:	106.511	Version No./Date:	09/04/2000
PBR No.:	106.261	Version No./Date:	9/4/2000
PBR No.:	106.261	Version No./Date:	11/1/2003
PBR No.:	106.262	Version No./Date:	11/1/2003

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

Table 1

Date	Permit No.	Regulated Entity No.
10/29/2024	O-2426	RN100236017

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	AF-01-16	OP-UA60 OP-REQ3	Acetophenone Emissions		106.262/07/15/2016[140882]	
D	2	54	OP-REQ2	Jacket Line- Methanol		106.261/03/04/2008[84132]	
D	3	54	OP-REQ2	Jacket Line-Methanol		106.262/06/29/2007[82175]	
D	4	65	OP-REQ2	Flat Line 65/Methanol		106.262/09/16/2005[76750]	
D	5	60	OP-REQ2	Line 60 – Polyethylene Extrusion		106.262/02/19/2001[47214]	
D	6	FLAT	OP-REQ2	Flat Line Extrusion/Methanol		106.262/04/09/2001[47195]	
D	7	57	OP-REQ2	Line 57		010/06/13/1995[111492]	
D	8	VULCANIZATION LINE	OP-REQ2	Vulcanization Line		010/4/1/1994[111493]	
D	9	CJ-01-2016	OP-REQ2	Cable Jacketing		106.221/07/15/2016	
D	10	CV-01-16	OP-REQ2	Thermoset Usage		106.221/07/15/2016	
D	11	CV-02-16	OP-REQ2	Thermoset Usage		106.221/07/15/2016	
D	12	CT-01-16	OP-REQ2	Cooling Tower		106.371/07/15/2016	

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

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

Page ____ of ____

**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.
10/29/2024	O-2426	RN100236017

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
A	13	60-4	OP-UA15	Silo 60-4 Dust Collection System		177396 (Pending)	
A	14	CV1-61	OP-REQ2	CV Doghouse Vent Emissions		177396 (Pending)	
A	15	CV1-62	OP-REQ2	CV Doghouse Vent Emissions		177396 (Pending)	
A	16	CV1-63	OP-REQ2	CV Doghouse Vent Emissions		177396 (Pending)	
A	17	CV2-66	OP-REQ2	CV Doghouse Vent Emissions		177396 (Pending)	
A	18	CV2-67	OP-REQ2	CV Doghouse Vent Emissions		177396 (Pending)	
A	19	CV2-68	OP-REQ2	CV Doghouse Vent Emissions		177396 (Pending)	
A	20	CV2-69	OP-REQ2	CV Doghouse Vent Emissions		177396 (Pending)	

**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.
10/29/2024	O-2426	RN100236017

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
A	21	BLG1-CV61	OP-REQ2	Indoor Building 1 CV Lines Fugitive Emissions		177396 (Pending)	
A	22	BLG1-CV62	OP-REQ2	Indoor Building 1 CV Lines Fugitive Emissions		177396 (Pending)	
A	23	BLG1-CV63	OP-REQ2	Indoor Building 1 CV Lines Fugitive Emissions		177396 (Pending)	
A	24	BLG2-CV66	OP-REQ2	Indoor Building 2 CV Lines Fugitive Emissions		177396 (Pending)	
A	25	BLG2-CV67	OP-REQ2	Indoor Building 2 CV Lines Fugitive Emissions		177396 (Pending)	
A	26	BLG2-CV68	OP-REQ2	Indoor Building 2 CV Lines Fugitive Emissions		177396 (Pending)	
A	27	BLG2-CV69	OP-REQ2	Indoor Building 2 CV Lines Fugitive Emissions		177396 (Pending)	

**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.
10/29/2024	O-2426	RN100236017

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
A	28	FUG1-CV61	OP-REQ2	Outdoor Building 1 CV Lines Fugitives		177396 (Pending)	
A	29	FUG1-CV62	OP-REQ2	Outdoor Building 1 CV Lines Fugitives		177396 (Pending)	
A	30	FUG1-CV63	OP-REQ2	Outdoor Building 1 CV Lines Fugitives		177396 (Pending)	
A	31	FUG2-CV66	OP-REQ2	Outdoor Building 2 CV Lines Fugitives		177396 (Pending)	
A	32	FUG2-CV67	OP-REQ2	Outdoor Building 2 CV Lines Fugitives		177396 (Pending)	
A	33	FUG2-CV68	OP-REQ2	Outdoor Building 2 CV Lines Fugitives		177396 (Pending)	
A	34	FUG2-CV69	OP-REQ2	Outdoor Building 2 CV Lines Fugitives		177396 (Pending)	

**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.
10/29/2024	O-2426	RN100236017

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
A	35	BLG1-J54	OP-REQ2	Indoor Building 1 Jacketing Lines Fugitive Emissions		177396 (Pending)	
A	36	BLG1-J55	OP-REQ2	Indoor Building 1 Jacketing Lines Fugitive Emissions		177396 (Pending)	
A	37	BLG1-J56	OP-REQ2	Indoor Building 1 Jacketing Lines Fugitive Emissions		177396 (Pending)	
A	38	BLG2-J53	OP-REQ2	Indoor Building 2 Jacketing Lines Fugitive Emissions		177396 (Pending)	
A	39	BLG2-J57	OP-REQ2	Indoor Building 2 Jacketing Lines Fugitive Emissions		177396 (Pending)	
A	40	FUG1-J54	OP-REQ2	Outdoor Building 1 Jacketing Lines Fugitives		177396 (Pending)	
A	41	FUG1-J55	OP-REQ2	Outdoor Building 1 Jacketing Lines Fugitives		177396 (Pending)	

**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.
10/29/2024	O-2426	RN100236017

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Proc ess CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
A	42	FUG1-J56	OP-REQ2	Outdoor Building 1 Jacketing Lines Fugitives		177396 (Pending)	
A	43	FUG2-J53	OP-REQ2	Outdoor Building 2 Jacketing Lines Fugitives		177396 (Pending)	
A	44	FUG2-J57	OP-REQ2	Outdoor Building 2 Jacketing Lines Fugitives		177396 (Pending)	
A	45	BLG1-M65	OP-REQ2	Indoor Building 1 Monosil Fugitive Emissions		177396 (Pending)	
A	46	BLG1-M65	OP-REQ2	Indoor Building 1 Monosil Fugitive Emissions		177396 (Pending)	
A	47	FUG1-M64	OP-REQ2	Outdoor Building 1 Monosil Fugitive Emissions		177396 (Pending)	
A	48	FUG1-M65	OP-REQ2	Outdoor Building 1 Monosil Fugitive Emissions		177396 (Pending)	
A	49	CWT-1	OP-UA13	Cooling Tower Emissions		177396 (Pending)	
A	50	CWT-2	OP-UA13	Cooling Tower Emissions		177396 (Pending)	

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

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

Page ____ of ____

**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.
10/29/2024	O-2426	RN100236017

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Proc ess CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
A	51	MIS-MSS	OP-REQ2	MSS		177396 (Pending)	
A	52	EMGCGEN	OP-UA2	Emergency Generator		106.511/9/4/2000	
D	53	EMGCGEN	OP-UA2	Emergency Generator		106.511/9/4/2000	
D	54	M- EXTRUSION	OP-REQ2	M Extrusion Lines		010/12/01/1972	
D	55	EXTRUSION	OP-REQ2	Extrusion Line		010/09/13/1993	
D	56	EXTRUSION	OP-REQ2	Extrusion Lines		010/04/05/1995	
D	57	EXTRUSION	OP-REQ2	Extrusion Lines		010/06/09/1995	
D	58	EXTRUSION	OP-REQ2	Extrusion Lines		010/03/30/1994	
D	59	JACKET	OP-REQ2	Jacketing Lines		106/07/20/1992	
D	60	COOL-1	OP-REQ2	COOLING TOWER		106.371/09/04/2000	

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

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

Page ____ of ____

**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.
10/29/2024	O-2426	RN100236017

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Proc ess CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
A	61	CL-01-16	OP-UA18	Cable Labeling		140882	

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

[Table 2](#)

Date	Permit No.	Regulated Entity No.
10/29/2024	O-2426	RN100236017

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.
14 15 16 17 18 19 20	CV1-61 CV1-62 CV1-63 CV2-66 CV2-67 CV2-68 CV2-69	OP-REQ2	A	GRPDHFVENT
21 22 23 24 25 26 27	BLG1-CV61 BLG1-CV62 BLG2-CV63 BLG2-CV66 BLG2-CV67 BLG2-CV68 BLG2-CV69	OP-REQ2	A	GRPBLGCV

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

[Table 2](#)

Date	Permit No.	Regulated Entity No.
10/29/2024	O-2426	RN100236017

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.
28 29 30 31 32 33 34	FUG1-CV61 FUG1-CV62 FUG2-CV63 FUG2-CV66 FUG2-CV67 FUG2-CV68 FUG2-CV69	OP-REQ2	A	GRPFUGCV
35 36 37 38 39	BLG1-J54 BLG1-J55 BLG1-J56 BLG2-J53 BLG2-J57	OP-REQ2	A	GRPBLGJ
40 41 42 43 44	FUG1-J54 FUG1-J55 FUG1-J56 FUG2-J53 FUG2-J57	OP-REQ2	A	GRPFUGJ

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

Table 2

Date	Permit No.	Regulated Entity No.
10/29/2024	O-2426	RN100236017

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.
45 46	BLG1-M64 BLG1-M65	OP-REQ2	A	GRPBLGM
47 48	FUG1-M64 FUG1-M64	OP-REQ2	A	GRPFUGM
49 50	CWT-1 CWT-2	OP-UA13	A	GRPCWT

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

Date	Permit No.	Regulated Entity No.
10/29/2024	O-2424	RN100236017

Unit ID No.	SOP/GOP Index No.	Commence	Table Applicability	HCl Emission	HCl-CMS
ANNEAL01	63DDDDDD-01	EXIST	T3.1G1		

**Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 4)**

Federal Operating Permit Program

Table 2a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

**Subpart ZZZZ: National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
10/29/2024	O-2426	RN100236017

Unit ID No.	SOP/GOP Index No.	HAP Source	Brake HP	Construction/ Reconstruction Date	Nonindustrial Emergency Engine	Service Type	Stationary RICE Type
EMGCYGEN	63ZZZZ-01	MAJOR	100-250	06+		EMER-A	

**Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 7)**

Federal Operating Permit Program

**Table 3: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117) Subchapter E: Multi-Region Combustion Control
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
10/29/2024	O-2426	RN100236017

Unit ID No.	SOP/GOP Index No.	Unit Type	Horsepower Rating	Landfill	Control Operations	NO _x and O ₂ Monitoring	Ammonia Use	NHR ₃ Emission Limitation	Ammonia Monitoring
EMGCYGEN	117-01	EMERG	500-						

Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 8)
Federal Operating Permit Program
Table 4a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
08/30/2024	O-2426	RN100236017

Unit ID No.	SOP/GOP Index No.	Construction/ Reconstruction/ Modification Date	Test Cell	Exemption	Temp Replacement	Horsepower	Fuel	AEL No.	Lean Burn	Commencing
EMGCYGEN	60JJJJ-01	YES	NO	NONE	NO	130-500E	NATGAS		NO	CON

Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 9)
Federal Operating Permit Program
Table 4b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
08/30/2024	O-2426	RN100236017

Unit ID No.	SOP/GOP Index No.	Manufacture Date	Displacement	Certified	Operation	Certified Modification	Service	Severe Duty	Optional Compliance
EMGCYGEN	60JJJJ-01	N0111+E		YES	YES		EMERG		

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
10/29/2024	O-2426	RN100236017

Unit ID No.	Registration No.	PBR No.	Registration Date
7	82175	106.262	6/29/2007
PEL-FAB-FIL	74613	106.261	2/9/2005
CL-01-16	140882	106.433	7/15/2016
SILO 90-1	78077	106.261	3/30/06

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
10/29/2024	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date
AD-01-16; AD-02-16	106.317	09/4/2000
BREAK PLATE	102	07/20/1992
BLDG-4	106.454	11/01/2001
EMGCYGEN	106.511	09/4/2000
HEAT 1-A-M	106.183	09/4/2000
HEAT 1-N	106.183	09/4/2000
HEAT 1-O	106.183	09/4/2000
HEAT 2-A	106.183	09/4/2000
HEAT 2-B	106.183	09/4/2000
HEAT 3	106.183	09/4/2000
HEAT 4-11	106.183	09/4/2000
HEAT BLDG-1	106.183	09/4/2000

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
10/29/2024	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date
ANNEAL01	106.183	09/04/2000
1012	059	05/08/1972
1013	059	05/08/1972
1014	059	05/08/1972
1016	059	05/08/1972
1017	059	05/8/1972
BLDG-2	089	11/01/2001
1003	106.261	11/01/2003
1008	106.261	11/01/2003

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

Date	Permit Number	Regulated Entity Number
10/29/2024	O-2426	RN100236017

PBR No.	Version No./Date
008	05/08/1972
034	07/20/1992
036	03/15/1985
039	03/15/1985/
059	05/08/1972
059	03/15/1985
070	03/15/1985
083	03/15/1985
089	09/23/1982
102	07/20/1992
103	03/15/1985

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
10/29/2024	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
7	106.262	82175	Compliance demonstration with 106.4 for any consecutive 12 month period by maintaining records regarding the quantity of air contaminants emitted by the facility
PEL-FAB-FIL	106.261	74613	Visible emissions, except uncombined water, to the atmosphere from any point or fugitive source shall not exceed 5.0% opacity in any six-minute period using Method 9.
CL-01-16	106.433	140882	Visible emissions, except uncombined water, to the atmosphere from any point or fugitive source shall not exceed 5.0% opacity in any six-minute period using Method 9. Data of daily coatings and solvent use and the actual hours of operation of each coating or stripping operation; A monthly report that represents actual hours of operation each day, and emissions from each operation in terms of pounds per hour; pound per day; pounds per week and tons emitted from the site during the previous 12 months.
SILO 90-1	106.261	78077	Visible emissions, except uncombined water, to the atmosphere from any point or fugitive source shall not exceed 5.0% opacity in any six-minute period using Method 9.

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
AD-01-16; AD-02-16	106.317	09/4/2000	Recordkeeping requirements as per 106.8
BREAK PLATE	102	07/20/1992	Monitoring and recordkeeping of hours and abrasive material usage. Monitor for no visible emissions
BLDG-4	106.454	11/01/2001	Record of solvents usage on monthly basis
EMGCYGEN	106.511	09/4/2000	Annual hours not to exceed 10% of the normal operating schedule of the primary equipment
HEAT 1-A-M	106.183	09/4/2000	Recordkeeping requirements as per 106.8
HEAT 1-N	106.183	09/4/2000	Recordkeeping requirements as per 106.8
HEAT 1-O	106.183	09/4/2000	Recordkeeping requirements as per 106.8
HEAT 2-A	106.183	09/4/2000	Recordkeeping requirements as per 106.8
HEAT 2-B	106.183	09/4/2000	Recordkeeping requirements as per 106.8
HEAT 3	106.183	09/4/2000	Recordkeeping requirements as per 106.8

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
HEAT 4-11	106.183	09/4/2000	Recordkeeping requirements as per 106.8
HEAT BLDG-1	106.183	09/4/2000	Recordkeeping requirements as per 106.8
ANNEAL01	106.183	09/04/2000	Recordkeeping requirements as per 106.8
1012	059	05/08/1972	Not applicable
1013	059	05/08/1972	Not applicable
1014	059	05/08/1972	Not applicable
1016	059	05/08/1972	Not applicable
1017	059	05/8/1972	Not applicable
BLDG-2	089	11/01/2001	Not Applicable
1003	106.261	11/01/2003	Visible emissions and recordkeeping as per 106.8
1008	106.261	11/01/2003	Visible emissions and recordkeeping as per 106.8

From: [Jasmine Yuan](#)
To: wendy.garner@prysmiangroup.com
Subject: Technical Review - O2426 Prysmian Cables and Systems USA, LLC (Renewal, 37080)
Date: Wednesday, October 16, 2024 1:55:00 PM
Attachments: [image001.png](#)

Good Afternoon Ms. Garner,

I have been assigned to the Federal Operating Permit (FOP) renewal application of Permit No. O2426 for Prysmian Cables and Systems USA, LLC, Prysmian Cables and Systems. This application has been assigned Project No. 37080. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

Upon Review, I noticed the following deficiencies:

- 1, OP-PBRSUP should have Table C and D. All units on Table A and B should be listed on Table D. Redate the updated form. You can leave the Table C blank if no insignificant sources under PBR.
- 2, In your current permit, you have emergency engine, EMGCYGEN, with MACT ZZZZ applicability Index 63ZZZZ-01. Please confirm your UA2 for MACT ZZZZ is to update the existing requirements. For example, the attributes current is Major for HAP source code, now on UA2 you change it to Area. Brake HP is now 250-300. Your UA2 has 100-250. Shall I change the current ones to new ones on UA2?
- 3, You have ANNEAL01 on UA6 in your application. However, it is currently on UA5 with MACT 5D manual build requirement. Please follow UA5 OR 6 instruction, and update the form as needed. Check your current permit and see if previous manual build is still valid. Let me know if you want to remove previous manual build and move the unit to UA6 and have the new requirements. Revise the UA forms as needed. If you decide to use UA5, please re-fill the UA5 MACT 5D table.
- 4, Please follow OP-SUMR instruction to revise the form. You cannot add group itself without unit ID in it. The group needs to have individual units. The units have the same requirements, permit shields, then they can be grouped. OP-SUMR table 1 need to be unit ID, table 2 add the unit ID into groups. If it is a unit, it cannot be named as GPRXXXX. GRP is only for group. Redate the form after revision.
- 5, PBRs on OP-PBRSUP need to match PBRs on OP-REQ1 Page 87-88. For example, OP-PBRSUP Table A has 106.261, 106. 433, Table B has 102. These needs to be included in OP-REQ1 Page 88 PBR list. 106.472 Version date needs to be figured out, either 09/04/2000 or 03/14/1997. Please follow our instruction to revise the form. OP-REQ1, PAGE 88, 106.511 VERSION DATE 07/06/2022 is wrong. It should be either 1997 or 2000, check the rule please. When you list the PBR, no need to list the name, just 106.511, 106.454.

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

Form OP-REQ1: Page 88	
XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)	
◆ I. Permits by Rule (30 TAC Chapter 106) for the Application Area	
<i>A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.</i>	
PBR No.: §106.511 – Emergency Engine	Version No./Date: 07/06/2022
PBR No.: §106.454 – Cold Solvent Cleaners	Version No./Date: 11/01/2001
PBR No.: §106.317 – Miscellaneous Metal Equipment	Version No./Date: 09/04/2000
PBR No.: Standard Exemption 102 – Breaker Plate Cleaning	Version No./Date: 06/18/1992
PBR No.: §106.472 - Organic and Inorganic Liquid Loading and Unloading	Version No./Date: unknown
PBR No.: §183 – Boilers, Heaters, and Other Combustion Devices	Version No./Date: 09/04/2000
◆ 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:

6, Remove registered PBRs in REQ1, Section H, page 87. This section is not meant for PBRs. It is for NSR, Standard permit. You should list the pending NSR 177396, leave issuance date as pending.
 7, Your site has 111492, 111493, which should be listed on OP-REQ1 Page 87 Part H. You can double check your current permit and see all PCA list. You renewal application PCA information on OP-REQ1 should be complete, not just part of PCA list. Please revise all PCA information.
 8, All registered PBRs need to go to OP-SUMR, and OP-PBRSUP associated with unit ID. When you list the PBR information follow the guidance/instruction in the form to format the PBR, It should be Unit XXX, 106.261/09/04/2000[74613]. All forms OP-REQ1 Page 88, OP-SUMR, and OP-PRBSUP should be match each other.

Please address the above mentioned items by 10/30/2024.

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

- NSR permit and PBR monitoring sufficiency –please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient.
- Reference to confidential business information (CBI) in NSR permits and PBR submittals.
- High level terms in the SOP Applicable Requirement Summary Table. The high level terms are sometimes used in SOPs when unit attribute forms have not yet been updated due to regulatory amendments.
- Accuracy of PBR information provided on the supplemental table and in the permit – please refer to Forms OP-PBRSUP and OP-REQ1 Instructions.

If you have any questions or concerns on any of these items or think you need to do any additional updates, let me know and we can discuss further.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail

require certification using an original signature OP-CRO1.

Please notify me when these updates have been submitted.

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

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

Thank you for your cooperation.

Sincerely,

Jasmine Yuan
TCEQ Air Permits Division
P.O. Box 13087, MC 163
Austin, TX 78753
Phone: (512)239-6090
Fax: (512)239-1400
Jasmine.Yuan@tceq.texas.gov

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

Steven Piper

From: eNotice TCEQ
Sent: Wednesday, September 4, 2024 11:02 AM
To: Bryan.hughes@senate.texas.gov; Jay.dean@house.texas.gov
Subject: TCEQ Notice - Permit Number O2426
Attachments: TCEQ Notice - O2426_37080.pdf

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

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

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

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

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 4, 2024

THE HONORABLE BRYAN HUGHES
TEXAS SENATE
PO BOX 12068
AUSTIN TX 78711-2068

Re: Accepted Federal Operating Permit Renewal Application
Project Number: 37080
Permit Number: O2426
Prysmian Cables and Systems USA, LLC
Prysmian Cables And Systems
Scottsville, Harrison County
Regulated Entity Number: RN100236017
Customer Reference Number: CN605993161

Dear Senator Hughes:

This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) renewal application for a site located in your district. As part of this permitting process, the applicant is required to publish a formal newspaper public notice. The notice will inform the public of their right to make comments or request a public hearing. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. <https://gisweb.tceq.texas.gov/LocationMapper/?marker=-94.228055,32.516666&level=13>.

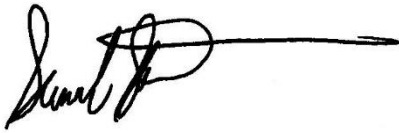
The FOP program regulates both new and existing major sources of emissions. The goal of the program is to improve air quality in Texas through increased compliance by codifying existing applicable regulatory requirements into the FOP. The FOP provides the applicant authorization to operate the equipment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

The Honorable Bryan Hughes
Page 2
September 4, 2024

Re: Accepted Federal Operating Permit Renewal Application

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

Sincerely,

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

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

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 4, 2024

THE HONORABLE JAY DEAN
TEXAS HOUSE OF REPRESENTATIVES
PO BOX 2910
AUSTIN TX 78768-2910

Re: Accepted Federal Operating Permit Renewal Application
Project Number: 37080
Permit Number: O2426
Prysmian Cables and Systems USA, LLC
Prysmian Cables And Systems
Scottsville, Harrison County
Regulated Entity Number: RN100236017
Customer Reference Number: CN605993161

Dear Representative Dean:

This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) renewal application for a site located in your district. As part of this permitting process, the applicant is required to publish a formal newspaper public notice. The notice will inform the public of their right to make comments or request a public hearing. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. <https://gisweb.tceq.texas.gov/LocationMapper/?marker=-94.228055,32.516666&level=13>.

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

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

Sincerely,

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

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

Texas Commission on Environmental Quality

Title V Existing

2426

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	PRYSMIAN CABLES AND SYSTEMS
County	HARRISON
Latitude (N) (##.#####)	32.516666
Longitude (W) (-###.#####)	94.228055
Primary SIC Code	3357
Secondary SIC Code	
Primary NAICS Code	331319
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN100236017
What is the name of the Regulated Entity (RE)?	PRYSMIAN CABLES AND SYSTEMS
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	9975 US HIGHWAY 80 E
City	SCOTTSVILLE
State	TX
ZIP	75688
County	HARRISON
Latitude (N) (##.#####)	32.516111
Longitude (W) (-###.#####)	-94.228055
Facility NAICS Code	
What is the primary business of this entity?	MANUFACTURER OF LOW MED HIGH VOLT CABLE

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN605993161
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Prysmian Cables and Systems USA, LLC
Texas SOS Filing Number	703635623
Federal Tax ID	
State Franchise Tax ID	15710615111
State Sales Tax ID	
Local Tax ID	
DUNS Number	
Number of Employees	501+
Independently Owned and Operated?	Yes

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	Prysmian Cables and Systems
Prefix	MR
First	Juan
Middle	
Last	Vargas
Suffix	
Credentials	
Title	Plant Manager
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 430
Routing (such as Mail Code, Dept., or Attn:)	
City	SCOTTSVILLE
State	TX
ZIP	75688
Phone (###-###-####)	9039358594
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	juan.vargas@prysmiangroup.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.	WENDY GARNER(PRYSMIAN CABLES...)
Organization Name	PRYSMIAN CABLES AND SYSTEMS USA LLC
Prefix	MS
First	WENDY
Middle	
Last	GARNER
Suffix	
Credentials	
Title	HSE MANAGER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 430
Routing (such as Mail Code, Dept., or Attn:)	
City	SCOTTSVILLE
State	TX
ZIP	75688

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

9039358527

Extension

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

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

E-mail

wendy.garner@prysmiangroup.com

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	32 Deg 31 Min 0 Sec
3) Permit Longitude Coordinate:	94 Deg 13 Min 41 Sec
4) Is this submittal a new application or an update to an existing application?	New Application
4.1. What type of permitting action are you applying for?	Renewal
4.1.1. Are there any permits that should be voided upon issuance of this permit application through permit conversion?	No
4.1.2. Are there any permits that should be voided upon issuance of this permit application through permit consolidation?	No
5) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

[File Properties]

File Name

OP_1_3. 10002 OP1.pdf

Hash

2CAEAE2632E29F0A6AE7815E87FFF59BB412B15696D6FF5D8B70B0A165A5225E

MIME-Type

application/pdf

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

[File Properties]

File Name

OP_2_4. 10059 OP2.pdf

Hash

6D599B7ADB14BCCD653547D00E535B3207B43D214EB8743C30B4B597800AB716

MIME-Type

application/pdf

Attach OP-ACPS (Application Compliance Plan and Schedule)

[File Properties]

File Name

OP_ACPS_5. Form OP-ACPS - Completed.pdf

Hash

6B2A1D0165374BA449D6AE42416E5A3B9DD41CEE26846CCE4942CC37A5245A04

MIME-Type

application/pdf

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

[File Properties]

File Name

OP_REQ1_6. 10043 OPREQ1 v2.pdf

Hash C4B3A89A9E44350EDA087371B764B637CD77E29EAB4F938C468529155CA1EAFB
MIME-Type application/pdf

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

[File Properties]

File Name OP_REQ2_7. 10017
OPREQ2.pdf

Hash 7A6982B28176A064289D83A2EE3B3A3BD7A7002CDFE9D5D9A9498518B8498EA8
MIME-Type application/pdf

Attach OP-REQ3 (Applicable Requirements Summary)

[File Properties]

File Name OP_REQ3_8. 10018
OPREQ3.pdf

Hash FF3D9805E5CAB7A303D981A2C51DCB68EF82FC69EC85EC1FA35E6B7844107944
MIME-Type application/pdf

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

[File Properties]

File Name OP_PBRSUP_9. 20875 OP
PBR SUP.pdf

Hash 28443F883DCC8F6F320B25DF0187BF665071E54B7CBCA3E9687FA8221142CF25
MIME-Type application/pdf

Attach OP-SUMR (Individual Unit Summary for Revisions)

[File Properties]

File Name OP_SUMR_10. 10344
OPSUMR.pdf

Hash 76D99B48E995BE1D2601E2EEF92574FDBD489CE936EEA3CC58A247503AF5B355
MIME-Type application/pdf

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

[File Properties]

File Name OP UA Forms.pdf

Hash 736AC421B0DA3C4AB74878549A606655C65F06C0D5156CD5E522C37F0975782A
MIME-Type application/pdf

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

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name	Prysmian SOP 08302024 GRM.pdf
Hash	7308F9686C61F2AC06B68FBC58562531151D32E5AC465AB173171A2CA9E567EB
MIME-Type	application/pdf

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

[File Properties]

File Name	Form OP-CROI Certification by Responsible Official Federal Operating Permit.pdf
Hash	59D3B08F70E459E2D206E458F17DEAD9A65D6A6DFD56E2F8081F7E7BA02CAF94
MIME-Type	application/pdf

Expedite Title V

1) Per Texas Health and Safety Code, Section 382.05155, does the applicant want to expedite the processing of this application?	No
---	----

Certification

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

1. I am Juan Vargas, the owner of the STEERS account ER099567.
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 2426.
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: Juan Vargas OWNER OPERATOR

Account Number:	ER099567
Signature IP Address:	208.251.0.0
Signature Date:	2024-08-30
Signature Hash:	127F5352C92661026B942933352B03972EDA8350630192A8F5DDDA55F8CC8E1C
Form Hash Code at time of Signature:	F272B08BEC22380DF7CDDE444CAC6609A0DA097D7B758C6F8716DE6EA53A123D

Submission

Reference Number:	The application reference number is 678909
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Submitted by:

The application was submitted by
ER099567/Juan Vargas

Submitted Timestamp:

The application was submitted on 2024-08-30
at 10:16:45 CDT

Submitted From:

The application was submitted from IP address
208.251.0.0

Confirmation Number:

The confirmation number is 560596

Steers Version:

The STEERS version is 6.81

Permit Number:

The permit number is 2426

Additional Information

Application Creator: This account was created by Gordon R Moore

TITLE V SITE OPERATING PERMIT

Application for Prysmian Cables and Systems

Permit No. O-2426

Prepared for:



Prysmian Cables and Systems USA, LLC

9975 US Highway 80E
Harrison County
Scottsville, Texas
CN605993161
RN100236017

August 30, 2024

Prepared by:



CK Project Number: 20788

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1.0 INTRODUCTION

Prysmian Cables and Systems USA, LLC (Prysmian) owns and operates the Prysmian Cable and Systems (aka, the Marshall Plant), which is a cable manufacturing plant that produces stranded, insulated and non-insulated low, medium, and high voltage aluminum cable for the electrical power transmission industry located at Marshall Plant, 9975 U.S. Highway 80 E, Scottsville, Harrison County, Texas. A Site Location Map is included as Figure 3.

With this Title V Site Operating Permit (SOP) renewal submittal, Prysmian proposes to include the following changes in the modification:

- Removal of Process ID No. AF-01-16: All Acetophenone emissions at Marshall were previously included in one Process ID (No. AF-01-16). Each process unit will be separately permitted;
- Addition of Group ID Doghouse Vents (Group ID No. GRPDHVENT) to the permitted emissions;
- Addition of Group ID Building Fugitives (Group ID No. GRPBLGFUG) to the permitted emissions;
- Addition of Group ID Outside Fugitives (Group ID No. GRPOUTFUG) to the permitted emissions;
- Addition of Group ID Cooling Water Tower (Group ID No. GRPCWT) to the permitted emissions;
- Addition of one (1) emergency generator (Unit ID No. EMGCYGEN).

The forms included are OP-1, OP-2, OP-CRO1, OP-ACPS, OP-REQ1, OP-REQ-2, OP-REQ3, OP-PBR SUP, OP-SUMR, OP-UA2, OP-UA6 and OP-UA18. In addition, a site location map, a facility plot plan, and a process flow diagram are included.

1.1 Process Description

The Marshall Plant is Prysmian's largest site, spanning over 1mm square feet. It has a headcount of more than 600 team members and operates 24/7 to cable solutions to all of North America. The Marshall Plant specializes in producing Low-Voltage Aluminum overhead and underground cables, Bare Overhead Distribution and Transmission cables, and Medium-Voltage Utility and Renewable cables.

The manufacturing process begins with wire drawing. Wire drawing elongates the rod through a series of dies and heated lubrication where it stretches the rod into the desired wire diameter output. Drawn wire is put onto bobbins or coiled onto stem packs to prepare for the next production stages. The drawn wire is taken from bobbins or stems and loaded into the Stranding machines. The stranded product may have one to four layers of wire, each being stranded in an alternating direction, which provides support and structure to the product being made. At this point in the process, if the product at the stranding operation is for a customer's order for bare

overhead product, the finished conductor is put on to customer reels. For medium voltage or low voltage products, the strand goes on to the next manufacturing operation sequence, which is extrusion.

Extrusion is the process of applying plastic compounds over the strand that was manufactured in the previous steps. This coating provides a protective insulation layer for the cable. Marshall has 3 extrusion processes: Monosil, Continuous Vulcanization (CV) and Jacketing. Monosil utilizes a chemical called Silfin 75 which is the crosslinking agent for the cable. This process creates methanol (HAP) as a byproduct of the curing phase (post-extrusion).

CV extrusion is specific to the Medium Voltage products where three layers of plastic compound are applied onto the stranded cable and immediately nitrogen cured in an enclosed long tube. This curing process emits Acetophenone (HAP) as a byproduct. Finally, Jacketing extrusion is where a polyethylene-based compound is applied over the cable to provide mechanical and thermal protection to the CV core. During the jacket process, water-swellaable tape and water-swellaable powder are applied under the jacket to specific products based on customer specifications.

The finished products undergo multiple electrical testing for quality assurance before final packaging and shipment preparation.

1.2 Air Emissions

The facility is a major source as defined in 30 TAC Chapter 122 and currently operates under Site Operating Permit O-2426 issued July 1, 2020. With this Title V SOP renewal submittal, Prysmian is proposing to include new existing cable production lines termed as the Windstar Project and increase the production rates associated with other existing cable production lines. The facility is simultaneously submitting an initial New Source Review (NSR) PI-1 Permit application that will seek to consolidate multiple sources, previously authorized under Permit by Rules (PBRs), into the NSR permit. This SOP modification seeks to incorporate applicable changes into the Title V SOP permit as well.

The following table provides a summary of the equipment, their source descriptions and authorizations.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization
ANNEAL01	Annealing Furnace	PBR 183/09/04/2000
CL-01-16	Surface Coating Operations	PBR 106.433/09/04/2000
EMGCYGEN	SRIC Engine	PBR No. 106.511/04/06/2022
GRPDHVENT	CV Doghouse Vent Emissions	PBR Superseded by NSR PI-1, submitted 08/30/2024
GRPBLGFUG	Indoor Building 1 & 2 CV, Jacketing & Monosil Lines Fugitive Emissions	PBR Superseded by NSR PI-1, submitted 08/30/2024
GRPOUTFUG	Outdoor Building 1 & 2 CV, Jacketing & Monosil Lines Fugitive Emissions	PBR Superseded by NSR PI-1, submitted 08/30/2024
GRPCWT	Cooling Tower Emissions	PBR Superseded by NSR PI-1, submitted 08/30/2024

The submittal contains the required forms and supporting documentation for Marshall to obtain a renewal of the SOP. A compilation of the applicable TCEQ forms is provided in Section 3.0.

2.0 REGULATORY APPLICABILITY

The Marshall Plant is subject to State and Federal regulations. Prysmian shall comply with all applicable emissions control, monitoring, testing, recordkeeping, and reporting requirements. Below is a summary of applicable regulations.

2.1 TCEQ Applicable Regulations

30 TAC Chapter 101 General Rules

The project will be operated according to the General Rules relating to circumvention, nuisance, traffic hazards, notification requirements for major upset, notification requirements for maintenance, sampling, sampling ports, emissions inventory requirements, sampling procedures and terminology, compliance with Environmental Protection Agency (EPA) standards, the National Primary and Secondary Air Quality Standards, inspection fees, emissions fees, and other applicable General Rules. Specific rules are addressed below:

Rule §101.2: Multiple Air Contaminant Sources or Properties

Upon TCEQ request, Prysmian will comply with §101.2(a), if applicable.

Rule §101.3: Circumvention

Prysmian is submitting documentation of the proposed emission sources covered by this air

permit application and addressing on a point-by-point basis how the company will comply with applicable requirements of the TCAA. Therefore, according to the requirements of 101.3, no attempt is being made to circumvent the provisions of the TCAA or the federal Clean Air Act.

Rule §101.4: Nuisance

The project at the Marshall Plant will not discharge air contaminants in such concentration and of such duration that are, or may tend to be, injurious to or adversely affect human health or welfare, animal life, vegetation, or property, or to interfere with the normal use of enjoyment of animal life, vegetation, or property. Therefore, this rule does not apply.

Rule §101.5: Traffic Hazard

There are no permitted sources of emissions at the facility which will cause, or have a tendency to cause, a traffic hazard or interfere with normal road use. Therefore, this rule does not apply.

Rule §101.8: Sampling

Prysmian will comply with sampling requirements of §101.8, upon request by the Executive Director.

Rule §101.9: Sampling Ports

Upon request by the Executive Director, Prysmian shall provide sufficient access to electrical power and plant operations to allow the TCEQ to conduct sampling following the requirements of this rule.

Rule §101.10: Emissions Inventory Requirements

The Marshall Plant is located in Harrison County (an ozone attainment area) and has estimated site-wide total emissions of VOC greater than 10 tons per year (tpy). The facility is a major source of HAPs. Therefore, per §101.10(a)(5), Prysmian will submit an initial annual emissions inventory (AEI) of actual emissions by March 31 of the year following start of normal operations and submit an AEI each year thereafter following the applicable requirements of the rule.

Rule §101.14: Sampling Procedures and Terminology

As necessary, Prysmian will use generally acceptable sampling and measurement methods in compliance with this requirement.

Rule §101.20: Compliance with EPA Standards

The Marshall Plant is a minor source of criteria pollutants and a major source of HAPs with respect to federal PSD, NNSR, Title V, and HAP program requirements. For the project, Prysmian will comply with applicable requirements under New Source Performance Standards (NSPS). The facility is not subject to any National Emission Standard for Hazardous Air Pollutants (NESHAP) rules promulgated under 40 CFR Part 61. Prysmian will comply with applicable requirements under the NESHAP for Source Categories, 40 CFR 63 (i.e., "MACT").

Rule §101.21: The Primary and Secondary NAAQS and Effective Date

Prysmian understands that the primary and secondary NAAQS are enforceable throughout all

parts of Texas.

Rule §101.23: Alternate Emission Reduction Policy

Prysmian does not intend to apply for an alternate emissions reduction as described in §101.23.

Rule §101.24: Inspection Fees and Rule 101.27: Emissions Fees

Prysmian will pay applicable TCEQ inspection or emissions fees, whichever is greater, according to the requirements of §101.24 and §101.27.

Rule §101.26: Surcharge on Fuel Oil in Specified Boilers

The Marshall Plant does not operate any fuel oil-fired boilers. Therefore, this rule does not apply.

Rule §101.28: Stringency Determination for Federal Operating Permits

Prysmian is subject to the federal operating permit and will comply with this requirement accordingly.

Rule §101.100 – §100.122: Failure to Attain Fee

This rule potentially applies to major stationary sources of VOC or NO_x located in the Houston-Galveston-Brazoria (HGB) ozone nonattainment area for the 1-hour ozone NAAQS. The Marshall Plant is located in Harrison County and therefore is not subject to this rule.

Rule §101.150 – §100.155: Voluntary Supplemental Leak Detection Program

Prysmian is a cable manufacturing facility. Therefore, this voluntary rule does not apply.

Rule §101.201: Emissions Events Reporting and Recordkeeping Requirements

Prysmian will follow the applicable reporting and recordkeeping requirements of this rule for any defined reportable emissions event.

Rule §101.211 – §101.224: Scheduled Maintenance, Start-Up and Shutdown Reporting, Recordkeeping, and Operational Requirements to Reduce Excessive Emissions

Prysmian shall maintain air pollution emissions capture and abatement equipment in good working order and shall notify the Executive Director and other appropriate air pollution control agencies of maintenance activities, according to the requirements of 101.211(a), and create a final record in accordance with 101.211(b) and 101.211(c). Upon request, Prysmian will submit a technical plan for maintenance activities to the Executive Director following the requirements of 101.211(e).

Rule §101.300 – §101.311: Emissions Banking and Trading

The Marshall Plant is located in an attainment area. Therefore, the facility is not subject to the NO_x MECT. The site will also not be subject to the HRVOC MECT.

Rule §101.600 – §101.602: Expedited Permitting

Prysmian is not requesting expedited processing of this application.

30 TAC Chapter 106 Air Permits by Rule

The Marshall Plant is authorized by various registered and un-registered PBRs for sources that are not directly affected by the project. Prysmian meets the general requirements for claiming a PBR and registration of PBRs which are listed in the OP-REQ1 and the OP-PBRSUP. Prysmian complies with recordkeeping and reporting requirements as required.

30 TAC Chapter 111 Control of Air Pollution from Visible Emissions and Particulate Matter

Chapter 111 requirements for opacity, allowable emission limits, and ground level concentrations are applicable to emission sources included in this permit application. The facility will comply with each applicable requirement during normal operations, as discussed following.

Rule §111.111: Requirements for Specified Sources

Operation of the Marshall Plant may result in occasional visible emissions, but not in excess of the opacity limits specified in Rule 111.111. Per §111.111(a)(1)(B), opacity will not exceed 20% averaged over a six-minute period for any stationary vent. Note that there will be no process vent having a total flow rate $\geq 100,000$ actual cubic feet per minute; therefore the 15% opacity limitation of §111.111(a)(1)(C) and the opacity monitor requirement of §111.111(a)(1)(D) do not apply. Finally, the Marshall Plant will not have a flare or any combustion device firing oil or a solid fuel.

Rule §111.113: Alternate Opacity Limitations

Prysmian does not anticipate applying for an alternate opacity limitation. Therefore, this rule does not apply.

Rule §111.121 – §111.129: Incinerators

The Marshall Plant will not have liquid incinerators; therefore, this rule does not apply.

Rule §111.131 – §111.139: Abrasive Blasting of Water Storage Tanks Performed by Portable Operations

Should Prysmian consider abrasive blast cleaning of water storage tanks, potentially applicable requirements of this rule will be determined.

Rule §111.141 – §111.149: Materials Handling, Construction, Roads, Streets, Alleys, and Parking Lots

Sections 111.141 through 111.149 do not apply to locations in Harrison County as per the geographic areas in §111.141. Therefore, these rules do not apply to the facilities described in this application.

Rule §111.151: Emissions Limits on Nonagricultural Processes

Section 111.151 limits particulate matter (PM) emissions from nonagricultural processes. Stack emission sources will comply with the allowable PM emission rates specified in this rule.

Rule §111.153: Emissions Limits for Steam Generators

Prysmian will not operate any solid fuel-fired steam generators. Therefore, this rule does not apply.

Rule §111.171 – §111.183: Emissions Limits on Agricultural Processes and Exemptions for Portable or Transient Operations

Prysmian does not conduct operations that will be categorized as agricultural process, nor will they conduct public works projects; therefore, these rules do not apply.

Rule §111.201 – §111.221: Outdoor Burning

The Marshall Plant will not conduct outdoor burning. Therefore, this rule does not apply.

30 TAC Chapter 112 Control of Air Pollution from Sulfur Compounds

This Chapter provides requirements for control of sulfur dioxide, hydrogen sulfide, sulfuric acid, and total reduced sulfur from specified sources.

Upon request by the agency, Prysmian shall demonstrate compliance with the applicable requirements in accordance with this Chapter.

30 TAC Chapter 113 Standards of Performance for Hazardous Air Pollutants and for Designated Facilities and Pollutants

This Chapter incorporates by reference the Federal rules and regulations for Source Categories specified in 40 CFR Parts 61 and 63. Applicability of Part 63 is addressed later in this section.

30 TAC Chapter 115 Control of Air Pollution from Volatile Organic Compounds

This regulation requires control of VOC emissions from general sources, transfer operations, petroleum refining processes, petrochemical processes, solvent-using processes, miscellaneous industrial sources, and consumer-related sources. The Marshall Plant is located in Harrison County, which is a designated attainment area and potentially not subject to the requirements of this chapter.

30 TAC Chapter 116 Control of Air Pollution by Permits for New Construction or Modification

This regulation establishes requirements for permits to construct and operate any new facility, or modify an existing facility, which has potential to emit air contaminants. The NSR application that is being submitted simultaneously with the Title V SOP application fulfills the requirements of Chapter 116.

Rules §116.110 – §116.127: Permit Application Requirements

The general application requirements for a permit to construct are specified under Rule 116.111. Prysmian complies with these applicable requirements.

Rule §116.111(a)(2)(A): Protection of Public Health and Welfare

The emissions from the project at the Marshall Plant will comply with the rules and regulations of the TCEQ and the intent of the Texas Clean Air Act. As shown in Figure 1.1 of this application, there are no schools within 3,000 feet of the facility. Therefore, rule §116.111(a)(2)(A)(ii) which requires verification that the emissions from the facility will not result in any short-term effects of nuisance odors upon any individual attending a school within 3,000 feet of the facility does not apply.

Rule §116.111(a)(2)(B): Measurement of Emissions

Prysmian will have provisions for measuring the emission of significant air contaminants to comply with source stack testing requirements as determined by TCEQ.

Rule §116.111(a)(2)(C): Best Available Control Technology

Prysmian will apply state-BACT with consideration given to the technical practicality and economic reasonableness of reducing or eliminating emissions from the facility.

Rule §116.111(a)(2)(D): New Source Performance Standards (NSPS)

The emissions sources in the project at the Marshall Plant are not subject to any 40 CFR Part 60 NSPS requirements.

Rule §116.111(a)(2)(E): National Emission Standards for Hazardous Air Pollutants (NESHAP)

Per §61.01(c), this rule applies to the owner or operator of any stationary source for which a standard is prescribed under this part.

Rule §116.111(a)(2)(F): NESHAP for Source Categories

The Marshall Plant is subject to various 40 CFR 63 NESHAPs.

Rule §116.111(a)(2)(G): Performance Demonstration

Prysmian will achieve the performance represented in the NSR permit.

Rule §116.111(a)(2)(H): Non-Attainment New Source Review

The Marshall facility is located in Harrison County, which is an attainment area. Therefore, the project would not trigger NNSR review as it is not applicable.

Rule §116.111(a)(2)(I): Prevention of Significant Deterioration (PSD) Review

The Marshall facility is located in Harrison County, is not a major stationary source for PSD regulated pollutants of VOC, NO_x, CO, SO₂, and PM₁₀/PM_{2.5}.

Rule §116.111(a)(2)(J): Atmospheric Dispersion Modeling

Because the PSD rules do not apply to the project, PSD-related dispersion modeling is not required.

Rule §116.111(a)(2)(K): Hazardous Air Pollutants

This rule references affected sources as defined in §116.15(1) for hazardous air pollutants. §116.15(1) defines an affected source as “the stationary source or group of stationary sources which, when fabricated (on-site), erected, or installed meets the criteria in §116.180(a)(1) and (2) of this title (relating to Applicability) *and* for which no MACT standard has been promulgated under 40 CFR Part 63.”

Rule §116.111(a)(2)(L): Mass Emission Cap and Trade Allowances

The Marshall Plant is located in Harrison County, and not subject to the requirements in this section.

Rule §116.111(b): Public Notice

Prysmian is in compliance with the applicable public notice procedures outlined in 30 TAC §39.601 – 605.

Rule §116.127: Actual to Projected Actual and Emissions Exclusion Test for Emissions Increases

Prysmian shall comply accordingly for the project at the Marshall Plant.

Rule §116.140 – §116.143: Permit Fees

Prysmian has provided the required permit application fee for the most recent NSR application, in compliance with the requirements of this subpart.

Rule §116.150 – §116.151: Nonattainment Review

The Marshall Plant is located in Harrison County, which has been designated attainment for ozone; therefore, the facility is not subject to NNSR applicability review.

Rule §116.160 – §116.169: Prevention of Significant Deterioration Review

PSD review has not been triggered at the Marshall Plant.

Rule §116.170 – §116.176: Emission Reductions Offsets

Because NNSR is not triggered for this project, emission reduction offsets are not required.

Rule §116.178: Relocations and Changes of Location of Portable Facilities

The Marshall Plant is not a portable facility. Therefore, this rule does not apply.

30 TAC Chapter 117 Control of Air Pollution from Nitrogen Compounds

Per 30 TAC §117.2000, this rule applies to boilers and stationary reciprocating internal combustion (IC) engines located at area sources of NO_x with respect to East Texas, specifically Harrison County. The Marshall Plant is a minor (area) stationary source of NO_x. Therefore, the facility is not subject to the requirements in this section.

30 TAC Chapter 118 Control of Air Pollution Episodes

If necessary, Marshall Plant will comply and operate in accordance with the rules of the generalized and localized air pollution episodes.

30 TAC Chapter 122 Federal Operating Permits Program

The project is a minor source of criteria pollutants and a major source of HAPs with respect to state and federal Title V permit requirements. Therefore, the facility is subject to the federal operating permits.

2.2 New Source Performance Standards (NSPS)

Subpart A – General Provisions

40 CFR 60 Subparts RR and JJJJ were identified as potentially applicable regulations targeting surface coating operations and natural gas-fired internal combustion engines. The following paragraphs describe rule applicability with respect to Prysmian's operation.

Subpart RR – Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations

This subpart applies to coating lines used in the manufacture of pressure sensitive tape and other label materials. Per §60.440(b), any affected facility which inputs to the coating process 45 Mg of VOC or less in a twelve (12) month period is not subject to §60.442(a). If the facility exceeds 45Mg of VOC in a twelve (12) month period, Marshall Plant will be required to comply with §60.442(a). The Marshall Plant does not exceed the 45 Mg of VOC within a twelve (12) month period. Prysmian will comply with the applicable monitoring, recordkeeping and reporting requirements for surface coating operations.

Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

The standby generator engine (EMGCYGEN) is an affected source. Prysmian will comply with the applicable control, monitoring, reporting and recordkeeping requirements of this Subpart. The engine is a certified engine that is operated in accordance with the manufacturer's specifications.

2.3 National Emissions Standards for Hazardous Air Pollutants (NESHAP) (40 CFR 61)

Per §61.01(c), this rule applies to applies to the owner or operator of any stationary source for which a standard is prescribed under this part. Prysmian has the potential to emit HAPs and is a major source of HAPs. However, the Marshall Plant does not fall under any of the source categories or emit any of the pollutants regulated under any of the specific subpart of 40 CFR Part 61.

2.4 NESHAP for Source Categories (MACT) (40 CFR 63)

The site is a major source of hazardous air pollutants (HAPs). Facilities included in this application will operate in compliance with the applicable requirements of 40 CFR Part 63, as described below.

Subpart T - Halogenated Solvent Cleaning

This subpart establishes NESHAPs for individual cold solvent cleaning machines. This subpart is not applicable because the degreaser does not use halogenated solvents.

Subpart JJJ - Group IV Polymers and Resins

This subpart establishes NESHAPs for certain thermoplastic product process units and associated equipment. This subpart is not applicable because no facilities at the plant meet the definition of a thermoplastic product process unit.

Subpart SSSS - Surface Coating of Metal Coil

This subpart establishes NESHAPs for certain facilities that perform metal coil surface coating operations. This subpart is not applicable because the site is not a metal coil manufacturing facility.

Subpart Q - Industrial Process Cooling Towers

This subpart establishes NESHAPs for certain industrial process cooling towers that are operated with chromium-based water treatment chemicals. This subpart is not applicable because the cooling tower does not operate with chromium-based water treatment chemicals.

Subpart FFFF - Miscellaneous Organic Chemical Manufacturing

This subpart establishes NESHAPs for miscellaneous organic chemical manufacturing facilities and is referred to as the MON rule. The MON rule applies to miscellaneous organic chemical manufacturing process units ("MCPUs") that are located at, or are part of, a major source of HAPs unless exempted. 40 CFR § 63.2435(a). Prior applicability analyses had incorrectly indicated MON rule applicability to affected facilities due in part to mistaken representation of separate acetophenone processing step. Based on process review and additional applicability evaluations, Prysmian concludes that the MON rule is not applicable to the site because (1) the site produces insulated aluminum cables, not the relevant organic chemicals subject to the MON rule, and no MCU is therefore located at the site, and (2) the units located at the site are specifically exempted from the MON rule as "extrusion and drawing operations."

First, the MON rule defines MCU as "all equipment which collectively function to produce a product or isolated intermediate that are materials described in § 63.2435(b)." 40 CFR § 63.2550. The types of materials described in section 63.2435(b) are:

- (i) **An organic chemical(s)** classified using the 1987 version of SIC code 282 [Plastics Materials and Synthetic Resins, Synthetic Rubber, Cellulosic and Other Manmade Fibers, Except Glass], 283 [Drugs], 284 [Soap, Detergents, and Cleaning Preparations; Perfumes, Cosmetics, and Other Toilet Preparations], 285 [Paints, Varnishes, Lacquers, Enamels, and Allied Products], 286 [Industrial Organic Chemicals], 287 [Agricultural Chemicals], 289 [Miscellaneous Chemical Products], or 386 [Photographic Equipment and Supplies], except as provided in paragraph (c)(5) of this section;
- (ii) **An organic chemical(s)** classified using the 1997 version of NAICS code 325 [Chemical Manufacturing], except as provided in paragraph (c)(5) of this section;
- (iii) Quaternary ammonium compounds and ammonium sulfate produced with caprolactam;
- (iv) Hydrazine; and
- (v) **Organic solvents** classified in any of the SIC or NAICS codes listed in paragraph (b)(1)(i) or (ii) of this section that are recovered using nondedicated solvent recovery operations.

Prysmian does not produce any of the above-listed organic chemical products. The site produces insulated aluminum cables for the electrical power transmission industry. Third-party polyethylene ("PE") is heated and extruded onto cables as cross-linked polyethylene ("PEX") in Unit ID No. AF-01-16 to serve as protective insulation and jacketing material. Neither PE nor PEX is manufactured as "products" that would be subject to the rule. The extrusion process likewise does not produce an "isolated intermediate"—defined as a "product of a process that is stored before subsequent processing"—because the extrusion process does not produce chemical products for interim storage other than the insulated cables. Because the site does not produce the relevant organic products, the MON rule does not apply.

The extrusion process is also specifically exempted from the MON rule as "extrusion and drawing operations." The MON rule exempts: "... extrusion and drawing operations (converting an already produced solid polymer into a different shape by melting or mixing the polymer and then forcing it or pulling it through an orifice to create an extruded product). An operation is not exempt if it involves processing with HAP solvent or if an intended purpose of the operation is to remove residual HAP monomer." 40 CFR § 63.2435(c)(4). Prysmian receives PE pellets ("an already produced solid polymer") for its operations, which it heats and melts for application as insulation over aluminum cabling of various sizes ("melting or mixing the polymer and then forcing it or pulling it through an orifice to create an extruded product"). This process does not incorporate any HAP solvent to create a new product, nor is the intended purpose to "remove residual HAP monomer."

For these reasons, the MON rule is therefore not applicable to the site.

Subpart MMMM - Surface Coating of Miscellaneous Metal Parts and Products

This subpart establishes NESHAPs for certain surface coating operations for metal parts and products. The source category “encompasses all industries that coat metal parts and products but are not subject to other surface coating regulations.” (EPA, Preliminary Industry Characterization: Miscellaneous Metal Parts & Products, Sept. 30, 1998). This category generally includes facilities “found under Standard Industrial Classification (SIC) codes 33 through 39.” *Id.* The site is categorized under SIC Code 3357, Drawing and Insulating of Nonferrous Wire, and NAICS code 331918, Other Aluminum Rolling Drawing and Extruding, and would therefore fall under this source category.

However, this subpart is not applicable because it specifically exempts “surface coating where plastic is extruded onto metal wire or cable or metal parts or products to form a coating,” as is the case for the extrusion operations at the site.

Subpart ZZZZ – Stationary Reciprocating Internal Combustion Engines

The one (1) standby/emergency generator onsite is an affected source. Unit No. EMGCYGEN is in compliance with this regulation by being in compliance with NSPS Subpart JJJJ. Prysmian will comply with the applicable monitoring, reporting, and recordkeeping requirements for the engine.

Subpart DDDDD – Industrial, Commercial, and Institutional Boilers and Process Heaters

The annealing furnace (Unit ID No. ANNEAL01) is an affected source. Prysmian will comply with the applicable monitoring, reporting, and recordkeeping requirements as required for process heaters with a heat input capacity of less than or equal to 5 million BTU per hour in a unit designed to burn gas 1 fuels.

Subpart A Case-By-Case MACT Approval

A case-by-case MACT determination is required for the construction of a major source of HAP that has not been specifically regulated or exempted from regulation under a NESHAP standard issued pursuant to Clean Air Act (“FCAA”) section 112(d). The effective date of FCAA § 112(g)(2)(B) in the State of Texas is June 29, 1998, while TCEQ adopted a program implementing FCAA § 112(g) in 2006. A case-by-case MACT limitation from FCAA section 112(g) applies to newly constructed facilities or reconstructed units or sources at existing facilities if they have the potential to emit hazardous air pollutants in “major” amounts (10 tons or more of an individual pollutant or 25 tons or more of a combination of pollutants). “Reconstruction” is defined as a change that costs 50 percent of the cost of constructing a new unit or source like the one being rebuilt. An existing facility would be subject to FCAA 112(g) requirements, for example, if it added or rebuilt a large production line or process that emitted toxic air pollutants above the “major” source threshold and no applicable MACT standard had been issued.

EPA's rules for FCAA section 112(g) are incorporated by reference in 30 TAC § 116.400. Section 116.400 of the TCEQ's rules states that "[t]he requirements of this subchapter apply to an owner or operator of an affected source (as defined in §116.15(1) of this title) that constructs or reconstructs, unless the affected source in question has been specifically regulated or exempted from regulation under a standard issued under FCAA, §112(d), (h), or (j) and incorporated in another subpart of 40 CFR Part 63, or the owner or operator of such affected source has received all necessary air quality permits for such construction or reconstruction project."

The extrusion process has the potential to emit more than 10 tpy of acetophenone and methanol, each a HAP, but is specifically exempted from regulations under Subpart Mmmm and FFFF. The MACT standard for the surface coating of miscellaneous metal parts and products (Subpart Mmmm) specifically exempts surface coating where plastic is extruded onto metal wire or cable or metal parts or products to form a coating, the exact activity at Prysmian. 40 CFR § 63.3881 (c)(5). The site is also specifically exempted from the Subpart FFFF MON rule as a type of "extrusion and drawing operation." 40 CFR § 63.2435(c)(4).

The operations at the site are specifically exempt from a promulgated MACT standard issued under FCAA section 112(d) and thus are not subject to the FCAA 112(g) case-by-case MACT.

SECTION 3.0

TCEQ SOP FORMS

FORM OP-CRO1

CERTIFICATION BY RESPONSIBLE OFFICIAL

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

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

I. Identifying Information		
RN: RN100236017	CN: CN605993161	Account No.: HH-0001-D
Permit No.: O-2426	Project No.: TBD	
Area Name: Prysmian Cables and Systems	Company Name: Prysmian Cables and Systems USA, LLC	
II. Certification Type <i>(Please mark the appropriate box)</i>		
<input checked="" type="checkbox"/> Responsible Official	<input type="checkbox"/> Duly Authorized Representative	
III. Submittal Type <i>(Please mark the appropriate box) (Only one response can be accepted per form)</i>		
<input type="checkbox"/> SOP/TOP Initial Permit Application	<input type="checkbox"/> Update to Permit Application	
<input type="checkbox"/> GOP Initial Permit Application	<input checked="" type="checkbox"/> Permit Revision, Renewal, or Reopening	
<input type="checkbox"/> Other: _____		
IV. Certification of Truth		
<p>This certification does not extend to information which is designated by the TCEQ as information for reference only.</p> <p>I, <u>Juan Vargas</u> _____ certify that I am the RO _____ <i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i></p> <p>and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:</p> <p><i>Note: Enter Either a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i></p> <p>Time Period: From _____ to _____ <i>Start Date</i> <i>End Date</i></p> <p>Specific Dates: <u>08/30/2024</u> _____ <i>Date 1</i> <i>Date 2</i> <i>Date 3</i> <i>Date 4</i> <i>Date 5</i> <i>Date 6</i></p>		
<p>Signature: _____ Signature Date: _____</p> <p>Title: <u>Plant Manager</u></p>		

FORM OP-1

SITE INFORMATION SUMMARY

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

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

I. Company Identifying Information
A. Company Name: Prysmian Cables and Systems USA, LLC
B. Customer Reference Number (CN): CN605993161
C. Submittal Date (mm/dd/yyyy): 08/30/2024
II. Site Information
A. Site Name: Prysmian Cables and Systems
B. Regulated Entity Reference Number (RN): RN100236017
C. Indicate affected state(s) required to review permit application: <i>(Check the appropriate box[es].)</i>
<input type="checkbox"/> AR <input type="checkbox"/> CO <input type="checkbox"/> KS <input checked="" type="checkbox"/> LA <input type="checkbox"/> NM <input type="checkbox"/> OK <input type="checkbox"/> N/A
D. Indicate all pollutants for which the site is a major source based on the site's potential to emit: <i>(Check the appropriate box[es].)</i>
<input type="checkbox"/> VOC <input type="checkbox"/> NO _x <input type="checkbox"/> SO ₂ <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> CO <input type="checkbox"/> Pb <input checked="" type="checkbox"/> HAPS
Other:
E. Is the site a non-major source subject to the Federal Operating Permit Program? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
F. Is the site within a local program area jurisdiction? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
G. Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
H. Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging: N/A
III. Permit Type
A. Type of Permit Requested: <i>(Select only one response)</i>
<input checked="" type="checkbox"/> Site Operating Permit (SOP) <input type="checkbox"/> Temporary Operating Permit (TOP) <input type="checkbox"/> General Operating Permit (GOP)

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

IV. Initial Application Information <i>(Complete for Initial Issuance Applications Only.)</i> N/A
A. Is this submittal an abbreviated or a full application? <input type="checkbox"/> Abbreviated <input type="checkbox"/> Full
B. If this is a full application, is the submittal a follow-up to an abbreviated application? <input type="checkbox"/> YES <input type="checkbox"/> NO
C. If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit? <input type="checkbox"/> YES <input type="checkbox"/> NO
D. Has an electronic copy of this application been submitted (or is being submitted) to EPA? (Refer to the form instructions for additional information.) <input type="checkbox"/> YES <input type="checkbox"/> NO
E. Has the required Public Involvement Plan been included with this application? <input type="checkbox"/> YES <input type="checkbox"/> NO
V. Confidential Information
A. Is confidential information submitted in conjunction with this application? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
VI. Responsible Official (RO) Identifying Information
RO Name Prefix: (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
RO Full Name: Juan Vargas
RO Title: Plant Manager
Employer Name: Prysmian Cables and Systems US Inc.
Mailing Address: 9975 US HWY 80 E
City: Scottsville
State: TX
ZIP Code: 75688
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (903) 935-8594
Fax No.:
Email: juan.vargas@prysmiangroup.com

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

VII. Technical Contact Identifying Information <i>(Complete if different from RO.)</i>
Technical Contact Name Prefix: (<input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input checked="" type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Technical Contact Full Name: Wendy Garner
Technical Contact Title: HSE Manager
Employer Name: Prysmian Cables and Systems US Inc.
Mailing Address: 9975 US HWY 80 E
City: Scottsville
State: TX
ZIP Code: 75688
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (903) 935-8527
Fax No.:
Email: wendy.garner@prysmiangroup.com
VIII. Reference Only Requirements <i>(For reference only.)</i>
A. State Senator: Bryan Hughes
B. State Representative: Jay Dean
C. Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
D. Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
E. Indicate the alternate language(s) in which public notice is required: Spanish

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

IX. Off-Site Permit Request <i>(Optional for applicants requesting to hold the FOP and records at an off-site location.)</i>
A. Office/Facility Name: N/A
B. Physical Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
C. Physical Location:
D. Contact Name Prefix: (<input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Contact Full Name:
E. Telephone No.:
X. Application Area Information
A. Area Name: Prysmian Cables and Systems
B. Physical Address: 9975 US HWY 80 E
City: Scottsville
State: TX
ZIP Code: 75688
C. Physical Location: 0.5 miles east of FM 2199 on Highway 80 East
D. Nearest City: Scottsville
E. State: TX
F. ZIP Code: 75688

**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): 32° 30' 59.06"
H. Longitude (nearest second): 94° 13' 38.3"
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? 1. <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
J. Indicate the estimated number of emission units in the application area: 7
K. Are there any emission units in the application area subject to the Acid Rain Program? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
XI. Public Notice (Complete this section for SOP Applications and Acid Rain Permit Applications only.)
A. Name of a public place to view application and draft permit: USPS Scottsville Post Office
B. Physical Address: 8657 US HWY 80 E
City: Scottsville
ZIP Code: 75688
C. Contact Person (Someone who will answer questions from the public during the public notice period):
Contact Name Prefix: (<input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input checked="" type="checkbox"/> Ms. <input type="checkbox"/> Dr.):
Contact Person Full Name: Wendy Garner
Contact Mailing Address: 9975 US HWY 80 E
City: Scottsville
State: TX
ZIP Code: 75688
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (903) 935-8527

1. The facility is currently conducting an audit under the Texas Audit Privilege Act.

**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: (<input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.) N/A
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.) N/A

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:

FORM OP-2

APPLICATION FOR PERMIT REVISION/RENEWAL

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

Date: 08/30/2024	
Permit No.: O-2426	
Regulated Entity No.: RN100236017	
Company Name: Prysmian Cables and Systems USA, LLC	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
I. Application Type	
Indicate the type of application:	
<input checked="" type="checkbox"/> Renewal	
<input type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
<input type="checkbox"/> Significant Revision	
<input type="checkbox"/> Revision Requesting Prior Approval	
<input type="checkbox"/> Administrative Revision	
<input type="checkbox"/> Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
For GOP Revisions Only	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)
Indicate all pollutants for which the site is a major source based on the site's potential to emit: (Check the appropriate box[es].)
<input type="checkbox"/> VOC <input type="checkbox"/> NO _x <input type="checkbox"/> SO ₂ <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> CO <input type="checkbox"/> Pb <input checked="" type="checkbox"/> HAP
Other:
IV. Reference Only Requirements (For reference only)
Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
V. Delinquent Fees and Penalties
Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.

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

Date: 08/30/2024
Permit No.: O-2426
Regulated Entity No.: RN100236017
Company Name: Prysmian Cables and Systems USA, LLC

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

Revision No.	Revision Code		Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
1	SIG-A	No	AF-01-16	OP-REQ3	140882	Delete Unit ID No. AF-01-16. AF-01-16 encompasses multiple emission points that require separate ID numbers. Delete requirements for 40 CFR 63 Subpart FFFF, as source is not applicable.
2	SIG-A	Yes	GRPDHVENT	OP-REQ2	Pending NSR, application submitted 08/30/2024	Add new ID Number. Emission point was previously included in ID No. AF-01-16. GRPDHVENT are not subject to 40 CFR 63 Subpart FFFF.
3	SIG-A	Yes	GRPBLGFUG	OP-REQ2	Pending NSR, application submitted 08/30/2024	Add new ID Number. Emission point was previously included in ID No. AF-01-16. GRPBLGFUG are not subject to 40 CFR 63 Subpart FFFF.
4	SIG-A	Yes	GRPOUTFUG	OP-REQ2	Pending NSR, application submitted 08/30/2024	A Add new ID Number. Emission point was previously included in ID No. AF-01-16. GRPOUTFUG are not subject to 40 CFR 63 Subpart FFFF.
5	SIG-A	No	GRPCWT	OP-REQ2	Pending NSR, application submitted 08/30/2024	GRPCWT is not subject to the requirements of 40 CFR 63 Subpart Q and 40 CFR 63 Subpart FFFF.
6	SIG-A	No	EMGCYGEN	OP-UA2	PBR 106.511	Add requirements for 40 CFR 60 Subpart JJJJ. New emergency generator was installed on 07/06/2022 and is subject to 40 CFR 60 Subpart JJJJ and 40 CFR 63 Subpart ZZZZ.

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

Date: 08/30/2024	
Permit No.: O-2426	
Regulated Entity No.: RN100236017	
Company Name: Prysmian Cables and Systems USA, LLC	
I. Significant Revision <i>(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)</i>	
A.	Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
B.	Indicate the alternate language(s) in which public notice is required: Spanish
C.	Will, there be a change in air pollutant emissions as a result of the significant revision? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

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

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

Pollutant	Description of the Change in Pollutant Emissions
Volatile Organic Compounds - ACETOPHENONE	Increase in air emissions due to plant expansion of new production lines known as the Windstar Project and increase in production rates associated with the existing process line, known as the Lonestar Project.
Volatile Organic Compounds - METHANOL	Increase in air emissions due to plant expansion of new production lines known as the Windstar Project and increase in production rates associated with the existing process line, known as the Lonestar Project.
Volatile Organic Compounds	Increase in air emissions due to plant expansion of new production lines known as the Windstar Project and increase in production rates associated with the existing process line, known as the Lonestar Project.
Particulate Matter	Increase in air emissions due to plant expansion of new production lines known as the Windstar Project and increase in production rates associated with the existing process line, known as the Lonestar Project.
Particulate Matter 2.5	Increase in air emissions due to plant expansion of new production lines known as the Windstar Project and increase in production rates associated with the existing process line, known as the Lonestar Project.
Particulate Matter 10	Increase in air emissions due to plant expansion of new production lines known as the Windstar Project and increase in production rates associated with the existing process line, known as the Lonestar Project.

FORM OP-ACPS

APPLICATION COMPLIANCE PLAN AND SCHEDULE

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

Date: 08/30/2024	Regulated Entity No.: RN100236017	Permit No.: O-2426
Company Name: Prysmian Cables and Systems USA, LLC		Area Name: Prysmian Cables and Systems

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

Part 1

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

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

Date: 08/30/2024	Regulated Entity No.: RN100236017	Permit No.: O-2426
Company Name: Prysmian Cables and Systems USA, LLC		Area Name: Prysmian Cables and Systems

Part 2

A. Compliance Schedule		
If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. <i>(See form instruction for details.)</i> If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.		
1. Specific Non-Compliance Situation		
Unit/Group/Process ID No.(s): AF-01-16		
SOP Index No.: 63FFFF-01		
Pollutant: VOC		
Applicable Requirement		
Citation	Text Description	
2. Compliance Status Assessment Method and Records Location		
Citation	Text Description	Location of Records/Documentation
3. Non-compliance Situation Description		
Facility is permitted as being subject to 40 CFR 63 Subpart FFFF; however, Prysmian is requesting a Permit Shield for this requirement. Facility was previously permitted under multiple PBRs, rather than NSR permit.		
4. Corrective Action Plan Description		
Initial NSR and Title V applications adding source and establishing non-applicability with regard to NESHAPS FFFF will be submitted on 08/30/2024.		
5. List of Activities/Milestones to Implement the Corrective Action Plan		
Prysmian is currently conducting an audit under the Texas Audit Privilege Act to correct permitting discrepancies.		
The Audit is not yet closed out.		
Initial NSR application and Title V application renewal will be submitted to TCEQ on 08/30/2024.		

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

Date: 08/30/2024	Regulated Entity No.: RN100236017	Permit No.: O-2426
Company Name: Prysmian Cables and Systems USA, LLC		Area Name: Prysmian Cables and Systems

Part 2 (continued)

6. Previously Submitted Compliance Plan(s)	
Type of Action	Date Submitted
"Otherwise" enter "N/A"	
7. Progress Report Submission Schedule	
NSR Permit and Title V permit renewal will be submitted on 08/30/2024, in accordance with the terms of the	
audit conducted under the Texas Audit Privilege Act.	

Reset Form

FORM OP-REQ1

**APPLICATION AREA-WIDE APPLICABILITY DETERMINATIONS
AND GENERAL INFORMATION**

Date:	08/30/2024
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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 1		
I. Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter		
A. Visible Emissions		
◆	1. The application area includes stationary vents constructed on or before January 31, 1972.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	2. The application area includes stationary vents constructed after January 31, 1972. <i>If the responses to Questions I.A.1 and I.A.2 are both "NO," go to Question I.A.6. If the response to Question I.A.1 is "NO" and the response to Question I.A.2 is "YES," go to Question I.A.4.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆	3. The application area is opting to comply with the requirements for stationary vents constructed after January 31, 1972 for vents in the application area constructed on or before January 31, 1972.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	4. All stationary vents are addressed on a unit specific basis.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆	5. Test Method 9 (40 CFR Part 60, Appendix A, Method 9 - Visual Determination of the Opacity of Emissions from Stationary Sources) is used to determine opacity of emissions in the application area.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆	6. The application area includes structures subject to 30 TAC § 111.111(a)(7)(A).	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆	7. The application area includes sources, other than those specified in 30 TAC § 111.111(a)(1), (4), or (7), subject to 30 TAC § 111.111(a)(8)(A).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	8. Emissions from units in the application area include contributions from uncombined water.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	9. The application area is located in the City of El Paso, including Fort Bliss Military Reservation, and includes solid fuel heating devices subject to 30 TAC § 111.111(c).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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Form OP-REQ1: Page 16	
V. Title 40 Code of Federal Regulations Part 59 (40 CFR Part 59) - National Volatile Organic Compound Emission Standards for Consumer and Commercial Products	
A. Subpart B - National Volatile Organic Compound Emission Standards for Automobile Refinish Coatings	
1. The application area manufactures automobile refinishing coatings or coating components and sells or distributes these coatings or coating components in the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area imports automobile refinishing coatings or coating components, manufactured on or after January 11, 1999, and sells or distributes these coatings or coating components in the United States. <i>If the responses to Questions V.A.1 and V.A.2 are both "NO," go to Section V.B.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. All automobile refinishing coatings or coating components manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR § 59.100(c)(1) - (6).	<input type="checkbox"/> YES <input type="checkbox"/> NO
B. Subpart C - National Volatile Organic Compound Emission Standards for Consumer Products	
1. The application area manufactures consumer products for sale or distribution in the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area imports consumer products manufactured on or after December 10, 1998 and sells or distributes these consumer products in the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area is a distributor of consumer products whose name appears on the label of one or more of the products. <i>If the responses to Questions V.B.1 - V.B.3 are all "NO," go to Section V.C.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
4. All consumer products manufactured, imported, or distributed by the application area meet one or more of the exemptions specified in 40 CFR § 59.201(c)(1) - (7).	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

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

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VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)	
C. Subpart GG - Standards of Performance for Stationary Gas Turbines (GOP applicants only) (continued)	
◆ 5. One or more stationary gas turbines subject to 40 CFR Part 60, Subpart GG in the application area is injected with water or steam for the control of nitrogen oxides.	<input type="checkbox"/> YES <input type="checkbox"/> NO
D. Subpart XX - Standards of Performance for Bulk Gasoline Terminals	
1. The application area includes bulk gasoline terminal loading racks. <i>If the response to Question VI.D.1 is "NO," go to Section VI.E.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. One or more of the loading racks were constructed or modified after December 17, 1980, and are not subject to 40 CFR Part 63, Subpart CC.	<input type="checkbox"/> YES <input type="checkbox"/> NO
E. Subpart LLL - Standards of Performance for Onshore Natural Gas Processing: Sulfur Dioxide (SO₂) Emissions	
◆ 1. The application area includes affected facilities identified in 40 CFR § 60.640(a) that process natural gas (onshore). <i>For SOP applications, if the response to Question VI.E.1 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.1 is "NO" or "N/A," go to Section VI.H.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆ 2. The affected facilities commenced construction or modification after January 20, 1984 and on or before August 23, 2011. <i>For SOP applications, if the response to Question VI.E.2 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.2 is "NO," go to Section VI.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 3. The application area includes a gas sweetening unit with a design capacity greater than or equal to 2 long tons per day (LTPD) of hydrogen sulfide but operates at less than 2 LTPD. <i>For SOP applications, if the response to Question VI.E.3 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.3 is "NO," go to Section VI.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
B. Subpart F - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry (continued)	
<p>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).</p> <p><i>If the response to Question VIII.B.2 is "NO," go to Section VIII.D.</i></p>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<p>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.</p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<p>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.</p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<p>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.</p> <p><i>If the response to Questions VIII.B.3, B.4 and B.5 are all "NO," go to Section VIII.D.</i></p>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

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

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

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Form OP-REQ1: Page 38	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)	
Process Wastewater Streams (continued)	
24. All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.C.24 is "YES," go to Question VIII.C.34.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
25. The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.C.25 is "NO," go to Question VIII.C.27.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
26. The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	<input type="checkbox"/> YES <input type="checkbox"/> NO
27. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	<input type="checkbox"/> YES <input type="checkbox"/> NO
28. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.C.27 - VIII.C.28 are both "NO," go to Question VIII.C.30.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
29. The application area includes waste management units that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	<input type="checkbox"/> YES <input type="checkbox"/> NO
30. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

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Form OP-REQ1: Page 40	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
C. Subpart G-National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operation, and Wastewater (continued)	
Drains (continued)	
37. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds listed in 40 CFR Part 63 Subpart G, Table 9, at an annual average flow rate greater than or equal to 10 liters per minute.	<input type="checkbox"/> YES <input type="checkbox"/> NO
38. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of a chemical manufacturing process unit that is subject to the new source requirements of 40 CFR § 63.100(l)(1) or (l)(2); and the equipment conveys water with a total annual average concentration greater than or equal to 10 parts per million by weight of compounds listed in 40 CFR Part 63 Subpart G, Table 8, at an average annual flow rate greater than or equal to 0.02 liter per minute.	<input type="checkbox"/> YES <input type="checkbox"/> NO
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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
40. The applicant is unable to comply with 40 CFR §§ 63.113 - 63.118 for one or more reasons described in 40 CFR § 63.100(q)(1), (3), or (5).	<input type="checkbox"/> YES <input type="checkbox"/> NO
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.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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

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Form OP-REQ1: Page 42	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
G. Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) (continued)	
4. The bulk gasoline terminal or pipeline breakout station is located within a contiguous area and under common control with sources, other than bulk gasoline terminals or pipeline breakout stations that emit or have the potential to emit HAPs. <i>If the response to Question VIII.G.4 is "YES," go to Question VIII.G.10.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. An emissions screening factor was calculated for the bulk gasoline terminal or pipeline breakout station. <i>If the response to Question VIII.G.5 is "NO," go to Question VIII.G.10.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The value 0.04(OE) is less than 5% of the value of the bulk gasoline terminal emissions screening factor (ET) or the pipeline breakout station emissions screening factor (Ep). <i>If the response to Question VIII.G.6 is "NO," go to Question VIII.G.10.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. Emissions screening factor less than 0.5 (ET or EP < 0.5). <i>If the response to Question VIII.G.7 is "YES," go to Section VIII.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. Emissions screening factor greater than or equal to 0.5, but less than 1.0 (0.5 ≤ ET or EP < 1.0). <i>If the response to Question VIII.G.8 is "YES," go to Section VIII.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. Emissions screening factor greater than or equal to 1.0 (ET or EP ≥ 1.0). <i>If the response to Question VIII.G.9 is "YES," go to Question VIII.G.11.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The site at which the application area is located is a major source of HAP. <i>If the response to Question VIII.G.10 is "NO," go to Section VIII.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
11. The application area is using an alternative leak monitoring program as described in 40 CFR § 63.424(f).	<input type="checkbox"/> YES <input type="checkbox"/> NO

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Form OP-REQ1: Page 43	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
H. Subpart S - National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry	
1. The application area includes processes that produce pulp, paper, or paperboard and are located at a plant site that is a major source of HAPs as defined in 40 CFR § 63.2. <i>If the response to Question VIII.H.1 is "NO," go to Section VIII.I.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area uses processes and materials specified in 40 CFR § 63.440(a)(1) - (3). <i>If the response to Question VIII.H.2 is "NO," go to Section VIII.I.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes one or more sources subject to 40 CFR Part 63, Subpart S that are existing sources. <i>If the response to Question VIII.H.3 is "NO," go to Section VIII.I.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes one or more kraft pulping systems that are existing sources.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes one or more dissolving-grade bleaching systems that are existing sources at a kraft or sulfite pulping mill.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes bleaching systems that are existing sources and are complying with the Voluntary Advanced Technology Incentives Program for Effluent Limitation Guidelines in 40 CFR § 430.24. <i>If the response to Question VIII.H.6 is "NO," go to Section VIII.I.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes bleaching systems that are complying with 40 CFR § 63.440(d)(3)(i).	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. The application area includes bleaching systems that are complying with 40 CFR § 63.440(d)(3)(ii).	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

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

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

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

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

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

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

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

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

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

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Form OP-REQ1: Page 54		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
Q. Subpart - HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities (continued)		
◆	<p>5. The application area contains only a facility, prior to the point of custody transfer, with facility-wide actual annual average natural gas throughput less than 18.4 thousand standard cubic meters (649,789.9 ft³) per day and a facility-wide actual annual average hydrocarbon liquid throughput less than 39,700 liters (10,487.6 gallons) per day.</p> <p><i>For SOP applications, if the response to Question VIII.Q.5 is "YES," go to Section VIII.R.</i></p> <p><i>For GOP applications, if the response to Question VIII.Q.5 is "YES," go to Section VIII.Z.</i></p> <p><i>For all applications, if the response to Question VIII.Q.5 is "NO," go to Question VIII.Q.9.</i></p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	<p>6. The application area includes a triethylene glycol (TEG) dehydration unit.</p> <p><i>For SOP applications, if the answer to Question VIII.Q.6 is "NO," go to Section VIII.R. For GOP applications, if the response to Question VIII.Q.6 is "NO," go to Section VIII.Z.</i></p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	<p>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.</p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	<p>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.</p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	<p>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).</p>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

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Form OP-REQ1: Page 56	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
U. Subpart PP - National Emission Standards for Containers (continued)	
4. The application area includes containers using Container Level 3 controls.	<input type="checkbox"/> YES <input type="checkbox"/> NO
V. Subpart RR - National Emission Standards for Individual Drain Systems	
1. The application area includes individual drain systems for which another 40 CFR Part 60, 61, or 63 subpart references the use of 40 CFR Part 63, Subpart RR for the control of air emissions.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards	
1. The application area includes an acetal resins production process unit; an acrylic and modacrylic fiber production process unit complying with 40 CFR § 63.1103(b)(3)(i); or an existing polycarbonate production process.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes process wastewater streams generated from an acetal resins production process unit; an acrylic and modacrylic fiber production process unit complying with 40 CFR § 63.1103(b)(3)(i); or an existing polycarbonate production process. <i>If the responses to Questions VIII.W.1 and VIII.W.2 are both "NO," go to Question VIII.W.20.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 under the requirements of 40 CFR § 63.132(c).	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes process wastewater streams that are determined to be Group 2 under the requirements of 40 CFR § 63.132(c).	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. All Group 1 wastewater streams at the site are determined to have a total source mass flow rate of less than 1 MG/yr.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.W.6 is "NO," go to Question VIII.W.8.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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Form OP-REQ1: Page 80	
XI. Miscellaneous (continued)	
G. 40 CFR Part 97, Subpart FFFFF - Texas SO₂ Trading Program	
1. The application area includes emission units complying with the requirements of the Texas SO ₂ Trading Program. <i>If the response to Question XI.G.1 is "NO," go to Question XI.G.6.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart B for SO ₂ and 40 CFR Part 75, Subpart H for heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes gas or oil-fired units that are complying with the monitoring requirements of 40 CFR Part 75, Appendix D for SO ₂ and heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes gas or oil-fired units that are complying with the Low Mass Emissions monitoring requirements of 40 CFR § 75.19 for SO ₂ and heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes units that are complying with EPA-approved alternative monitoring system requirements of 40 CFR Part 75, Subpart E for SO ₂ and heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes emission units that qualify for the Texas SO ₂ Trading Program retired unit exemption.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
H. Permit Shield (SOP Applicants Only)	
1. A permit shield for negative applicability entries on Form OP-REQ2 (Negative Applicable Requirement Determinations) is being requested or already exists in the permit.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

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

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

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

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

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

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

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XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)			
E. PSD Permits and PSD Major Pollutants		N/A	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
If PSD Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html .			
F. Nonattainment (NA) Permits and NA Major Pollutants		N/A	
NA Permit No.:	Issuance Date:	Pollutant(s):	
NA Permit No.:	Issuance Date:	Pollutant(s):	
NA Permit No.:	Issuance Date:	Pollutant(s):	
NA Permit No.:	Issuance Date:	Pollutant(s):	
If NA Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html .			
G. NSR Authorizations with FCAA § 112(g) Requirements		N/A	
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:

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◆ 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.: 74613	Issuance Date: 02/09/2005	Authorization No.: 140882	Issuance Date: 07/25/2016
Authorization No.: 82175	Issuance Date: 06/29/2007	Authorization No.: 78077	Issuance Date: 03/03/2006

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Form OP-REQ1: Page 88	
XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)	
◆ I. Permits by Rule (30 TAC Chapter 106) for the Application Area	
<i>A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.</i>	
PBR No.: §106.511 – Emergency Engine	Version No./Date: 07/06/2022
PBR No.: §106.454 – Cold Solvent Cleaners	Version No./Date: 11/01/2001
PBR No.: §106.317 – Miscellaneous Metal Equipment	Version No./Date: 09/04/2000
PBR No.: Standard Exemption 102 – Breaker Plate Cleaning	Version No./Date: 06/18/1992
PBR No.: §106.472 - Organic and Inorganic Liquid Loading and Unloading	Version No./Date: unknown
PBR No.: §183 – Boilers, Heaters, and Other Combustion Devices	Version No./Date: 09/04/2000
◆ J. Municipal Solid Waste and Industrial Hazardous Waste Permits With an Air Addendum	
Permit No.:	Issuance Date:
Permit No.:	Issuance Date:
Permit No.:	Issuance Date:
Permit No.:	Issuance Date:

FORM OP-REQ2

NEGATIVE APPLICABLE / SUPERSEDED REQUIREMENT DETERMINATIONS

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

Date	Permit No.	Regulated Entity No.
08/30/2024	O-2426	RN10023601

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
A	2	GRPDHVENT	OP-REQ2	40 CFR 63 Subpart FFFF	40 CFR §2435(b)	Prysmian produces insulated aluminum cables and does not produce any of the organic chemical products listed in 40 CFR §2435(b). Therefore, there is no MCPU located at the site.
A	2	GRPDHVENT	OP-REQ2	40 CFR 63 Subpart FFFF	40 CFR §2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer.”
A	3	GRPBLGFUG	OP-REQ2	40 CFR 63 Subpart FFFF	40 CFR §2435(b)	Prysmian produces insulated aluminum cables and does not produce any of the organic chemical products listed in 40 CFR §2435(b). Therefore, there is no MCPU located at the site.
A	3	GRPBLGFUG	OP-REQ2	40 CFR 63 Subpart FFFF	40 CFR §2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer.”
A	4	GRPOUTFUG	OP-REQ2	40 CFR 63 Subpart FFFF	40 CFR §2435(b)	Prysmian produces insulated aluminum cables and does not produce any of the organic chemical products listed in 40 CFR §2435(b). Therefore, there is no MCPU located at the site.

A	4	GRPOUTFUG	OP-REQ2	40 CFR 63 Subpart FFFF	40 CFR §2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer.”
A	5	GRPCWT	OP-REQ2	40 CFR 63 Subpart FFFF	40 CFR §2435(b)	Prysmian produces insulated aluminum cables and does not produce any of the organic chemical products listed in 40 CFR §2435(b). Therefore, there is no MCPU located at the site.
A	5	GRPCWT	OP-REQ2	40 CFR 63 Subpart FFFF	40 CFR §2435(c)(4)	The units located at the site are specifically exempt from the MON rule as “extrusion and drawing operations.” The processes do not incorporate any HAP solvent to create a new product, nor is the intended purpose to “remove residual HAP monomer.”
A	5	GRPCWT	OP-REQ2	40 CFR 63 Subpart Q	40 CFR 63.400(a)	The cooling tower does not operate with chromium-based water treatment chemicals.

FORM OP-REQ3

APPLICABLE REQUIREMENTS SUMMARY

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

Table 1a: Additions

Date: 08/30/2024	Regulated Entity No.: RN100236017	Permit No.: O-2426
Company Name: Prysmian Cables and Systems USA, LLC	Area Name: Prysmian Cables and Systems	

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)
6	EMGYCGEN	OP-UA2	60JJJJ-01	NOX, CO, VOC	NSPS Subpart JJJJ	§60.4231

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

Table 1b: Additions

Date: 08/30/2024	Regulated Entity No.: RN100236017	Permit No.: O-2426
Company Name: Prysmian Cables and Systems USA, LLC	Area Name: Prysmian Cables and Systems	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
6	EMGYCGEN	60JJJJ-01	NOX, CO, VOC		§60.4245(a)(2)	
6	EMGYCGEN	60JJJJ-01	NOX, CO, VOC		§60.4245(a)(3)	
6	EMGYCGEN	60JJJJ-01	NOX, CO, VOC		§ 60.4243(a)(1), (b)(1)	
6	EMGYCGEN	60JJJJ-01	NOX, CO, VOC		§ 60.7(f)	

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

Table 2a: Deletions

Date: 08/30/2024	Regulated Entity No.: RN100236017	Permit No.: O-2426
Company Name: Prysmian Cables and Systems USA, LLC	Area Name: Prysmian Cables and Systems	

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	AF-01-16	OP-REQ3	63FFFF-01	112(B) HAPS	40 CFR 63, Subpart FFFF	§63.2460(a)
1	AF-01-16	OP-REQ3	63FFFF-01	112(B) HAPS	40 CFR 63, Subpart FFFF	§63.2450(b)
1	AF-01-16	OP-REQ3	63FFFF-01	112(B) HAPS	40 CFR 63, Subpart FFFF	§63.2460(b)

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

Table 2b: Deletions

Date: 08/30/2024	Regulated Entity No.: RN100236017	Permit No.: O-2426
Company Name: Prysmian Cables and Systems USA, LLC	Area Name: Prysmian Cables and Systems	

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	AF-01-16	OP-REQ3	63FFFF-01	112(B) HAPS	§63.1257(d)(2)(i)	§63.2460(b)(6)(i)	§63.2460(b)(6)
1	AF-01-16	OP-REQ3	63FFFF-01	112(B) HAPS	§63.1257(d)(2)(ii)	§63.2460(b)(7)	§63.2460(b)(6)(i)
1	AF-01-16	OP-REQ3	63FFFF-01	112(B) HAPS	§63.2460(b)(1)		§63.2460(b)(6)(ii)
1	AF-01-16	OP-REQ3	63FFFF-01	112(B) HAPS	§63.2460(b)(2)		§63.2460(b)(7)
1	AF-01-16	OP-REQ3	63FFFF-01	112(B) HAPS	§63.2460(b)(3)		
1	AF-01-16	OP-REQ3	63FFFF-01	112(B) HAPS	§63.2460(b)(4)		
1	AF-01-16	OP-REQ3	63FFFF-01	112(B) HAPS	§63.2460(b)(7)		

FORM OP-PBRSUP

PERMIT 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
08/30/2024	O-2426	RN100236017

Unit ID No.	Registration No.	PBR No.	Registration Date
7	PBR No. 82175	106.261	06/29/2007
Pellet Handling	PBR No. 74613	106.261	02/09/2005
CL-01-16	PBR No. 140882	106.433	07/25/2016
SILO	PBR No. 78077	106.261	03/03/2006

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
08/30/2024	O-2426	RN100236017

Unit ID No.	PBR No.	Version No./Date
AD-01-16	PBR 106.317	09/04/2000
AD-02-16	PBR 106.317	09/04/2000
BREAK PLATE	Exemption 102	06/18/1992
TANK	PBR 106.472	unknown
Degreasing	PBR 106.454	11/01/2001
GEN-2	PBR 106.511	07/06/2022
COMBUSTION	PBR 183	09/04/2000

FORM 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.
08/30/2024	O-2426	RN100236017

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	AF-01-16	OP-REQ3	Chemical Manufacturing Process		106.262/11/01/2003	
A	2	GRPDHVENT	OP-REQ2	CV Doghouse Vent Emissions		Pending NSR, application submitted 08/30/2024	
A	3	GRPBLGFUG	OP-REQ2	Indoor Building Fugitive Emissions		Pending NSR, application submitted 08/30/2024	
A	4	GRPOUTFUG	OP-REQ2	Outdoor Building Fugitive Emissions		Pending NSR, application submitted 08/30/2024	
A	5	GRPCWT	OP-REQ2	Cooling Tower Emissions		Pending NSR, application submitted 08/30/2024	
	6	EMGCYGEN	OP-UA2	Emergency Generator		106.511/07/06/2022	

FORM OP-UA2

**STATIONARY RECIPROCATING INTERNAL
COMBUSTION ENGINE ATTRIBUTES**

**Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 4)**

Federal Operating Permit Program

Table 2a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

**Subpart ZZZZ: National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
08/30/2024	O-2426	RN100236017

Unit ID No.	SOP/GOP Index No.	HAP Source	Brake HP	Construction/ Reconstruction Date	Nonindustrial Emergency Engine	Service Type	Stationary RICE Type
EMGCYGEN	63ZZZZ-01	AREA	100-250	06+	YES		

Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 8)
Federal Operating Permit Program
Table 4a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
08/30/2024	O-2426	RN100236017

Unit ID No.	SOP/GOP Index No.	Construction/ Reconstruction/ Modification Date	Test Cell	Exemption	Temp Replacement	Horsepower	Fuel	AEL No.	Lean Burn	Commencing
EMGCYGEN	60JJJJ-01	YES	NO	NONE	NO	130-500E	NATGAS			CON

Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 9)
Federal Operating Permit Program
Table 4b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
08/30/2024	O-2426	RN100236017

Unit ID No.	SOP/GOP Index No.	Manufacture Date	Displacement	Certified	Operation	Certified Modification	Service	Severe Duty	Optional Compliance
EMGCYGEN	60JJJJ-01	N09-10E		YES	YES	NO	EMERG		

FORM OP-UA6

**BOILER/STEAM GENERATOR/STEAM GENERATOR ATTRIBUTES
COMBUSTION ENGINE ATTRIBUTES**

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

Date	Permit No.	Regulated Entity No.
08/30/2024	0-2426	RN100236017

Unit ID No.	SOP/GOP Index No.	Commence	Table Applicability	HCl Emission	HCl-CMS
ANNEAL01	63DDDDDD-01	EXIST	T3.1G2		

FORM OP-UA18

SURFACE COATING OPERATIONS ATTRIBUTES

Texas Commission on Environmental Quality
Surface Coating Operations Attributes
Form OP-UA18 (Page 7)
Federal Operating Permit Program

Table 7: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart RR: Standard of Performance for Pressure Sensitive Tape and Label Surface Coating Operations

Date:	08/30/2024
Permit No.:	O-2426
Regulated Entity No.:	RN100236017

Process ID No.	SOP Index No.	Construction / Modification Date	VOC Input	Compliance Demonstration	Facility Solvent Control	Common Emission Control	Incinerator Type	Emissions Capture	Control Device ID No.	Rep Stacks
CL-01-16	60RR-01	80+	45-							

FIGURES

FIGURE 1 – FACILITY PLOT PLAN

Figure 1
Facility Plot Plan

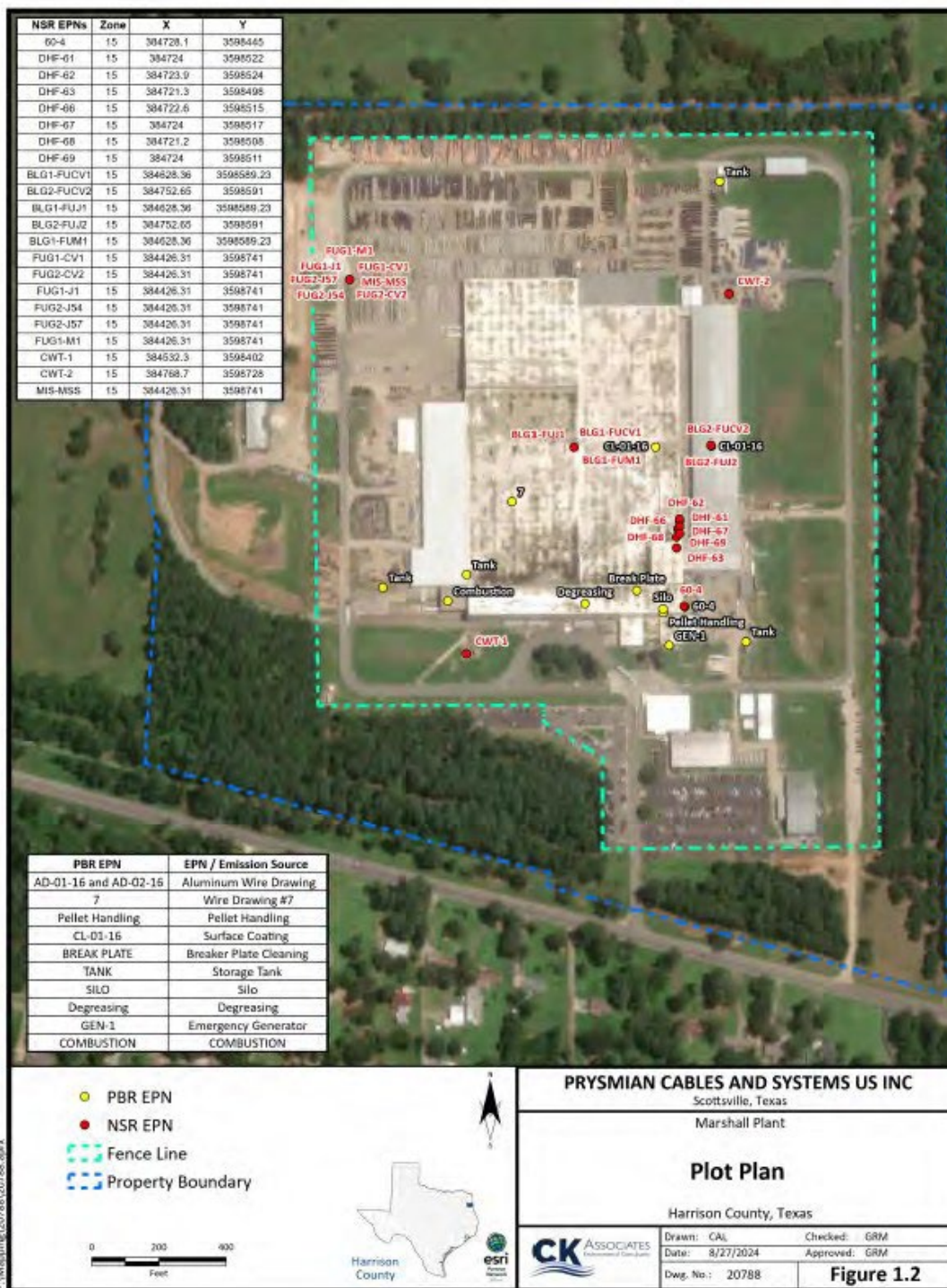


FIGURE 2 – PROCESS FLOW DIAGRAM

Figure 2: Process Flow Diagram

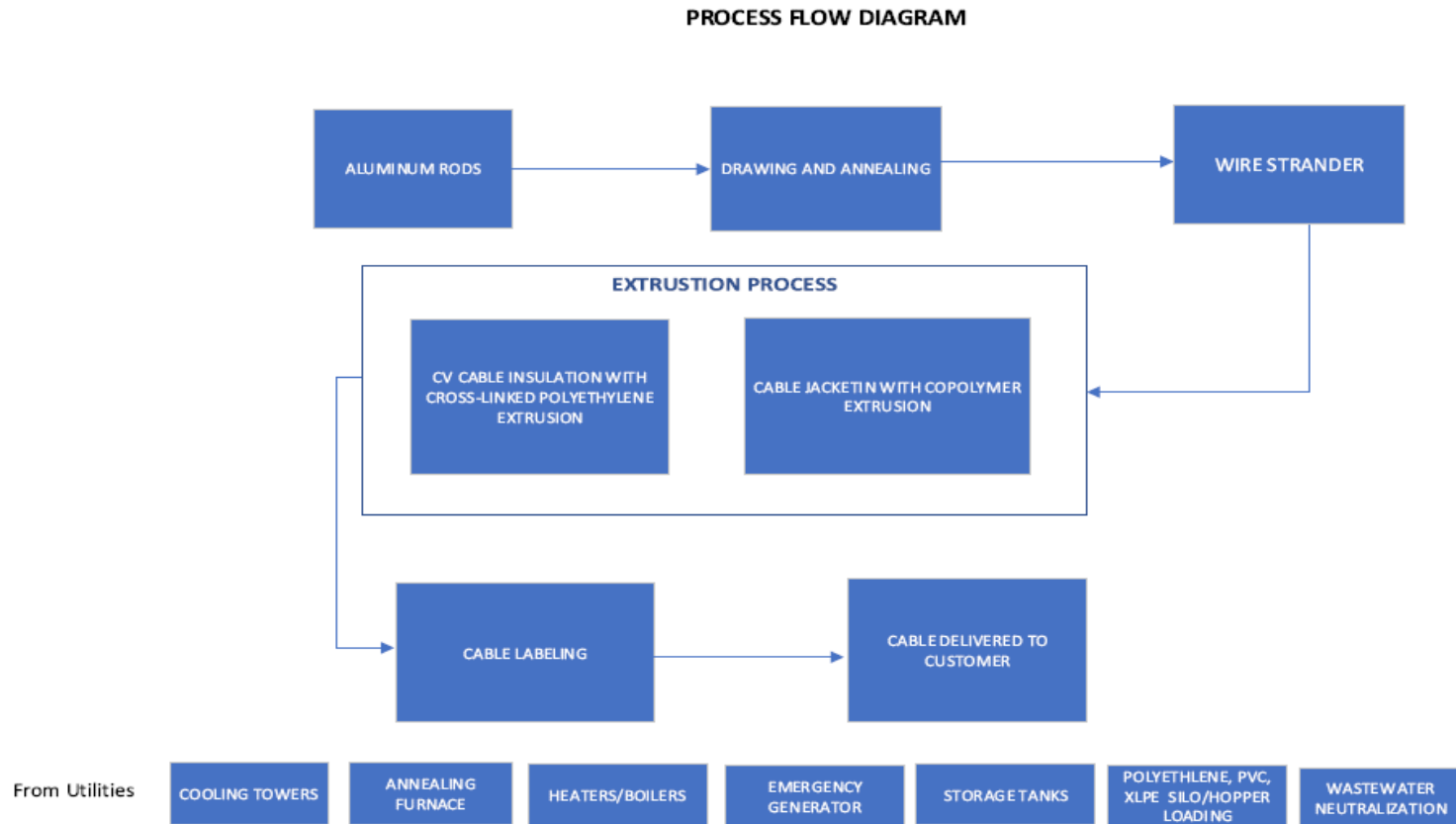


FIGURE 3 – SITE LOCATION MAP

**Figure 3:
Site Location Map**

