

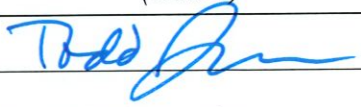
Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program
Texas Commission on Environmental Quality

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

I. Identifying Information
RN: RN102905064
CN: CN604333369
Account No.: SD-0184-W
Permit No.: O-3343
Project No.: N/A
Area Name: Ingleside Site
Company Name: Kiewit Offshore Services
II. Certification Type <i>(Please mark appropriate box)</i>
<input type="checkbox"/> Responsible Official Representative <input checked="" type="checkbox"/> Duly Authorized Representative
III. Submittal Type <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>
<input type="checkbox"/> SOP/TOP Initial Permit Application <input checked="" type="checkbox"/> Permit Revision, Renewal, or Reopening
<input type="checkbox"/> GOP Initial Permit Application <input type="checkbox"/> Update to Permit Application
<input type="checkbox"/> Other:

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

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

IV. Certification of Truth
This certification does not extend to information which is designated by TCEQ as information for reference only.
I, <u>Todd Brennan</u> certify that I am the <u>Duly Authorized Representative</u> <div style="display: flex; justify-content: space-between; margin-top: 5px;"><i>(Certifier Name printed or typed)</i><i>(RO or DAR)</i></div>
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete: <i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>
Time Period: From _____ to _____ <div style="display: flex; justify-content: space-between; margin-top: 5px;"><i>(Start Date)</i><i>(End Date)</i></div>
Specific Dates: <u>02/05/2025</u> <u>05/02/2025</u> <u>05/08/2025</u> <u>06/10/2025</u> <div style="display: flex; justify-content: space-between; margin-top: 5px;"><i>(Date 1)</i><i>(Date 2)</i><i>(Date 3)</i><i>(Date 4)</i></div>
<u>07/14/2025</u> _____ <div style="display: flex; justify-content: space-between; margin-top: 5px;"><i>(Date 5)</i><i>(Date 6)</i></div>
Signature: <u></u> Signature Date: <u>7/25/2025</u>
Title: <u>Vice President of Operations</u>

From: [Diana Villenas](#)
To: [Alyson Haynes](#)
Cc: [Mike Meister-PTR](#); [Emily Aronson](#); [Brenda Douglass](#); [Justin Moncus](#)
Subject: RE: Working Draft Permit -- FOP 03343/Project 37413, Kiewit Offshore Services LTD, Kiewit Ingleside Fabrication Yard
Date: Friday, July 25, 2025 2:58:52 PM
Attachments: [image001.png](#)
[image002.png](#)
[OPCRO-1_KiewitOffshoreServicesTitleVO3343RenewalCorrespondence.pdf](#)

Caution: This email may contain suspicious content. Please take care when clicking links or opening attachments. When in doubt, contact the TCEQ Help Desk.

Hi Alyson,

As requested, I've attached Kiewit Offshore Services' OP-CRO1.

Could you kindly provide the address I should mail the wet-ink original to? Or do you alternatively have the reference # and password for STEERS login?

Thank you,

Diana Villenas

Diana Villenas - Environmental
KIEWIT OFFSHORE SERVICES, LTD
2440 Kiewit Road, Ingleside, TX 78362
361-244-1270 Cell
kiewit.com



 Please consider the environment before printing this e-mail

From: Alyson Haynes <Alyson.Haynes@tceq.texas.gov>
Sent: Wednesday, July 23, 2025 9:09 AM
To: Emily Aronson <Emily.Aronson@trinityconsultants.com>
Cc: Brenda Douglass <brenda.douglass@kiewit.com>; Diana Villenas <diana.villenas@kiewit.com>; Justin Moncus <justin.moncus@kiewit.com>; Mike Meister <MMeister@trinityconsultants.com>
Subject: [External]RE: Working Draft Permit -- FOP 03343/Project 37413, Kiewit Offshore Services LTD, Kiewit Ingleside Fabrication Yard

Some people who received this message don't often get email from alyson.haynes@tceq.texas.gov. [Learn why this is](#)

important

Hi Emily,

I hope you are having a pleasant week. I am reaching out to request the certification of all revision items submitted during the technical review. Please do **one** of the following by **Wednesday, July 30, 2025**.

1. Send me an OP-CRO1. You can use the Time Period or Specific Date option on the form as long as the dates 02/05/2025, 05/02/2025, 05/08/2025, 06/10/2025, and 07/14/2025 are covered. You may email me a scan, but please follow up with the wet ink original in the mail afterwards. You could also upload the OP-CRO1 in STEERS.
2. Submit all updates in STEERS. It will be certified via the submittal process by having the RO or DAR sign and submit.

Please let me know if you have any questions regarding this request.

Best Regards,

Alyson H. Haynes
Title V Permit Reviewer
TCEQ – APD – OP Section (Title V)
(512) 239-6207



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

From: Emily Aronson <Emily.Aronson@trinityconsultants.com>

Sent: Monday, July 21, 2025 11:15 AM

To: Alyson Haynes <Alyson.Haynes@tceq.texas.gov>

Cc: Brenda.Douglass <brenda.douglass@kiewit.com>; Diana.Villenas <diana.villenas@kiewit.com>; Justin.Moncus <justin.moncus@kiewit.com>; Mike Meister <MMeister@trinityconsultants.com>

Subject: RE: Working Draft Permit -- FOP O3343/Project 37413, Kiewit Offshore Services LTD, Kiewit Ingleside Fabrication Yard

Good Morning Alyson,

Our team has completed our review of the WDP and we have no further comments.

Please let us know what further steps we need to take to complete the application process.

Thank you,

.....
Emily Aronson, EIT | Consultant – Corpus Christi

555 N Carancahua St | Ste 820 | Corpus Christi, TX 78401

[Trinity Consultants](#) | E: Emily.Aronson@trinityconsultants.com | P: (361) 235-3358



From: Alyson Haynes <Alyson.Haynes@tceq.texas.gov>

Sent: Friday, July 18, 2025 10:04 AM

To: Emily Aronson <Emily.Aronson@trinityconsultants.com>

Cc: Brenda.Douglass <brenda.douglass@kiewit.com>; Diana.Villenas <diana.villenas@kiewit.com>; Justin.Moncus <justin.moncus@kiewit.com>; Mike Meister <MMeister@trinityconsultants.com>

Subject: RE: Working Draft Permit -- FOP O3343/Project 37413, Kiewit Offshore Services LTD, Kiewit Ingleside Fabrication Yard

Hi Emily,

Attached is the revised WDP. This document will move to the next step of the SOP Permit process.

Best Regards,

Alyson H. Haynes

Title V Permit Reviewer

TCEQ – APD – OP Section (Title V)

(512) 239-6207

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

From: Emily Aronson <Emily.Aronson@trinityconsultants.com>

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

Date:	7/14/2025
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

From: [Emily Aronson](#)
To: [Alyson Haynes](#)
Cc: [Brenda.Douglass](#); [Diana.Villenas](#); [Justin.Moncus](#); [Mike Meister](#)
Subject: RE: Working Draft Permit -- FOP O3343/Project 37413, Kiewit Offshore Services LTD, Kiewit Ingleside Fabrication Yard
Date: Monday, July 14, 2025 12:21:45 PM
Attachments: [image001.png](#)
[OP-REQ1 2025 0708.pdf](#)
[Revised WDP comments.docx](#)

Good Afternoon,

We have reviewed the WDP with our team and we have a few additional comments. Please see the attached WDP with our comments.

Additionally, we have attached the revised OP-REQ1 page.

Please let us know if you need any further information or if you have any questions.

Thank you,

.....
Emily Aronson, EIT | Consultant – Corpus Christi

555 N Carancahua St | Ste 820 | Corpus Christi, TX 78401

[Trinity Consultants](#) | E: Emily.Aronson@trinityconsultants.com | P: (361) 235-3358



From: Alyson Haynes <Alyson.Haynes@tceq.texas.gov>

Sent: Thursday, July 3, 2025 9:32 AM

To: Emily Aronson <Emily.Aronson@trinityconsultants.com>

Cc: Brenda.Douglass <brenda.douglass@kiewit.com>; Diana.Villenas <diana.villenas@kiewit.com>; Justin.Moncus <justin.moncus@kiewit.com>; Mike Meister <MMeister@trinityconsultants.com>

Subject: RE: Working Draft Permit -- FOP O3343/Project 37413, Kiewit Offshore Services LTD, Kiewit Ingleside Fabrication Yard

Hi Emily,

I hope all is well. Attached is the revised WDP.

Please review the revised WDP and provide the requested forms by **07/15/2025**.

- The OP-REQ1 submitted with the renewal application states that the current permit DOES NOT “contain at least one periodic monitoring requirement”(XI.K.2). Please submit a revised OP-REQ1 form, Pg. 118 that

reflects the current period monitoring situation for GRP-TANKS (30 TAC Chapter 115, Storage of VOCs).

Have a nice holiday weekend!

Best Regards,

Alyson H. Haynes
Title V Permit Reviewer
TCEQ – APD – OP Section (Title V)
(512) 239-6207



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

From: Emily Aronson <Emily.Aronson@trinityconsultants.com>
Sent: Tuesday, June 10, 2025 11:09 AM
To: Alyson Haynes <Alyson.Haynes@tceq.texas.gov>
Cc: Brenda.Douglass <brenda.douglass@kiewit.com>; Diana.Villenas <diana.villenas@kiewit.com>; Justin.Moncus <justin.moncus@kiewit.com>; Mike Meister <MMeister@trinityconsultants.com>
Subject: RE: Working Draft Permit -- FOP O3343/Project 37413, Kiewit Offshore Services LTD, Kiewit Ingleside Fabrication Yard

Good Morning,

We have reviewed the WDP and have found multiple errors in the draft, please see the draft permit with the corrections in tracked changes. The updates reflected in the WDP are described below.

- In regards to the EMGEN Unit's Reporting Requirement [G]§60.4214(d), which we are requesting to be removed from the permit, the EMGEN does not have the capability to supply power to the grid and will never do so; therefore, KOS would like to request the removal of those applicable citations from their Title V permit.
- Additionally, due to the point above, KOS would like to request the removal of citation §60.4211(f)(3)(i) from their Title V permit.
- In regards to the GRP-PAINT Units' Applicable Requirements, existing requirements that should not have been removed from the permit were removed. Please see the attached draft permit for the other applicable citations that should be restored.
- PBR 106.146 was included in the New Source Review Authorizations list; however, this

PBR is not used onsite at this time or in the foreseeable future. Please remove all references to that PBR. Additionally, please remove PBR 106.392. The revised OP-REQ1 page 88 and revised OP-PBRSUP have been included with our response.

In response for your request for clarification on the §63.3890(c) citations, KOS compiles with 40 CFR Part 63, Subpart Mmmm using §63.3890(c)(1) for general use coating operations as opposed to using a facility specific emission limit.

Please let us know if you have any additional questions or require any further clarification.

Thank you,

.....
Emily Aronson, EIT | Consultant – Corpus Christi

555 N Carancahua St | Ste 820 | Corpus Christi, TX 78401

[Trinity Consultants](http://TrinityConsultants.com) | E: Emily.Aronson@trinityconsultants.com | P: (361) 235-3358



From: Alyson Haynes <Alyson.Haynes@tceq.texas.gov>

Sent: Friday, May 23, 2025 3:12 PM

To: Mike Meister <mmeister@trinityconsultants.com>

Cc: Diana Villenas <diana.villenas@kiewit.com>

Subject: Working Draft Permit -- FOP O3343/Project 37413, Kiewit Offshore Services LTD, Kiewit Ingleside Fabrication Yard

Hi Mike,

I hope you are having a pleasant week. I have conducted a technical review of the renewal application for the Kiewit Ingleside Fabrication Yard. An electronic copy of the Working Draft Permit (WDP) is attached for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided

Please review the WDP and submit to me any comments you have on the working draft permit by **06/13/2025**. Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

Additionally, please review the following information and provide a response by 6/13/2025.

Provide a justification for removing the monitoring requirement 60.4214(b) for unit EMGEN.

- Clarify which citation 63.3890(c)(1) or 63.3890(c)(2) applies to GRP-PAINT.

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,

Alyson H. Haynes

Title V Permit Reviewer

OA/Air Permits Division/OP Section

MC-163, P.O. Box 13087

Austin, TX 78711-3087

alyson.haynes@tceq.texas.gov

Phone: (512) 239-6207

Fax: (512) 239-1400

How are we doing? Fill out our online customer satisfaction

☐

survey at www.tceq.texas.gov/customersurvey

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

Table 1a: Additions

Date: 5/8/2025	Regulated Entity No.: RN102905064	Permit No.: O-3343
Company Name: Kiewit Offshore Services, Ltd.	Area Name: Ingleside Offshore Platform Fabrication Facilities	

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)
9	GRP-PAINT	OP-REQ3	63MMMM -0001	HAPS	40 CFR Part 63, Subpart MMMM	§63.3890(b) §63.3890(b)(1) §63.3891(b) §63.3892(a) §63.3893(a) §63.3900(a)(1) §63.3900(b)

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

Table 1b: Additions

Date: 5/8/2025	Regulated Entity No.: RN102905064	Permit No.: O-3343
Company Name: Kiewit Offshore Services, Ltd.	Area Name: Ingleside Offshore Platform Fabrication Facilities	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
9	GRP-PAINT	63MMMM-0001	HAPS	None	§63.3930(c)(1) §63.3930(c)(3) §63.3952	None

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

Table 2a: Deletions

Date: 5/8/2025	Regulated Entity No.: RN102905064	Permit No.: O-3343
Company Name: Kiewit Offshore Services, Ltd.	Area Name: Ingleside Offshore Platform Fabrication Facilities	

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)
8	EMGEN	OP-REQ3	60IIII-0001	CO	40 CFR Part 60, Subpart IIII	None
8	EMGEN	OP-REQ3	60IIII-0001	NMHC and NO _x	40 CFR Part 60, Subpart IIII	None
8	EMGEN	OP-REQ3	60IIII-0001	PM	40 CFR Part 60, Subpart IIII	None
9	GRP-PAINT	OP-REQ3	63MMMM-0001	HAPS	40 CFR Part 63, Subpart MMMM	None

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

Table 2b: Deletions

Date: 5/8/2025	Regulated Entity No.: RN102905064	Permit No.: O-3343
Company Name: Kiewit Offshore Services, Ltd.	Area Name: Ingleside Offshore Platform Fabrication Facilities	

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
8	EMGEN	OP-REQ3	60IIII-0001	CO	None	None	[G]§60.4214(d)
8	EMGEN	OP-REQ3	60IIII-0001	NMHC and NO _x	None	None	[G]§60.4214(d)
8	EMGEN	OP-REQ3	60IIII-0001	PM	None	None	[G]§60.4214(d)
9	GRP-PAINT	OP-REQ3	63MMMM-0001	HAPS	§ 63.3960(a)(1) § 63.3960(a)(2) § 63.3960(a)(3) § 63.3960(a)(4) § 63.3964 § 63.3965(a) § 63.3966(a) § 63.3966(b) § 63.3966(c) § 63.3966(d) § 63.3966(e) § 63.3966(f) § 63.3967(a) § 63.3967(c) § 63.3968(a) § 63.3968(c)(1) § 63.3968(f)	§ 63.3930(c)(4)	§ 63.3920(b)



9737 Great Hills Trail, Suite 340, Austin, TX 78759 / P 713-955-1230 / F (713) 955-1201 / trinityconsultants.com

May 2, 2025

Ms. Alyson Haynes
Texas Commission on Environmental Quality
OA/Air Permits Division/OP Section, MC 163
P.O. Box 13087
Austin, TX, 78711-3087

**Re: Response to Technical Review of FOP
Title V Permit O3343, Project Number 37413
Kiewit Offshore Services, Ltd.
RN102905064 / CN604333369**

Dear Ms. Haynes:

Kiewit Offshore Services, Ltd. (Kiewit) currently owns and operates an offshore vessel construction facility located at 2440 Kiewit Rd, Ingleside, San Patricio County, Texas. On November 11, 2024, Kiewit submitted a Title V Federal Operating Permit renewal/revision application for Permit Number O-3343 to the TCEQ. On April 28, 2025, TCEQ sent a request for additional information regarding the application to be submitted no later than May 2, 2025. On behalf of Kiewit, please find below the responses to the request for additional information (original text in *italics*).

Item 1. PBRs 106.371 and 106.452 are listed in the current effective permit, however, they are not included in the renewal application. If these PBRs are still in use, submit a revised OP-REQ1 page 88 and a revised OP-PBRSUP that include PBRs 106.371 and 106.452. Ensure that the revised documents include the updated submittal date. If the PBRs are no longer in use and should be removed from the permit provide an OP-2 with the revisions.

Response: Kiewit has voided the PBR 106.452 claim since the previous renewal. There are no applicable Title V requirements for this unit, therefore, a Form OP-2 has not been included with this action, as discussed during our teleconference on May 1, 2025.

Kiewit has updated the Forms OP-PBRSUP and OP-REQ1 to include the PBR 106.371 claim in this permitting action. The updated forms have been attached below in Attachments A and B, respectively.

Item 2. Please review the form instructions and revise the OP-ACPS form submitted on February 5, 2025 to reflect only the citation of the applicable requirement associated with the non-compliance situation.

Response: Kiewit has revised and attached Form OP-ACPS (Attachment C) based on our previous discussions during our teleconference on May 1, 2025, and subsequent email correspondence on May 2, 2025.

HEADQUARTERS

12700 Park Central Dr, Ste 2100, Dallas, TX 75251 / P 800.229.6655 / P 972.661.8100 / F 972.385.9203

Ms. Haynes
May 2, 2025

Item 3. For GRP-PAINT the OP-REQ3 form identifies citation 63.3890(a) for MACT MMMM. It does not identify the specific citations under 63.3890(a) which are 63.3890(a)(1), (a)(2), (a)(3), (a)(4) and (a)(5). Please identify each citation that applies by submitting an updated OP-REQ3. These citations will be used as the main standards and will be listed as separate rows in the applicable requirements summary table. If there are citations in the monitoring, testing and recordkeeping columns that only apply to a specific main standard citation make updates to those citations on the OP-REQ3 as well.

Response: Form OP-REQ3 has been updated to include the specific citations indicated. Please see the updated form provided in Attachment D.

Item 4. Additionally, the application cover letter states that with the renewal, the Major NSR Summary Table will be revised. Since the current effective permit does not contain a Major NSR Summary Table it seems like this is a typo. No Major NSR Summary table will be added to this permit.

Response: The request to update the Major NSR Summary Table was included in error. Please disregard.

If you have any questions or require additional information, please feel free to contact me at 512-349-5800 or mmeister@trinityconsultants.com.

Sincerely,
Trinity Consultants



Michael Meister
Principal Consultant

Enclosure

cc: Ms. Diana Villenas, District Environmental Manager, Kiewit Offshore Services, Ltd., Ingleside, TX
Mr. Guadalupe "Sonny" Lopez, Air Section Manager, TCEQ Region 14, Corpus Christi, TX
EPA, Region 6. (R6AirPermitsTX@epa.gov)

Ms. Haynes
May 2, 2025

ATTACHMENT A

OP-PBR SUP

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

Date	Permit Number	Regulated Entity Number
5/2/2025	O-3343	RN102905064

Unit ID No.	Registration No.	PBR No.	Registration Date
SPRAY	105659	106.261	6/13/2022
SPRAY	105659	106.262	6/13/2022
PAINT	109413	106.433	5/23/2022
FUGSTILL	152843	106.261	8/14/2018
PNTSTILL	152843	106.261	8/14/2018
SLVTK	152843	106.473	8/14/2018
FUGSTILL	166950	106.264	11/16/2021
PNTSTILL	166950	106.264	11/16/2021
PLASMA	167953	106.261	3/11/2022
PLASMA	167953	106.262	3/11/2022

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

Date	Permit Number	Regulated Entity Number
5/2/2025	O-3343	RN102905064

Unit ID No.	PBR No.	Version No./Date
EMGEN	106.511	9/4/2000
TANK 1	106.473	9/4/2000
TANK 2	106.472	9/4/2000
TANK 3	106.473	9/4/2000
TANK 4	106.472	9/4/2000
TANK 5	106.472	9/4/2000
MIX	106.141	3/7/2013
WELD	106.227	9/4/2000
SSM	106.263	11/1/2001
GRIND	106.265	9/4/2000
RESIN	106.392	9/4/2000
REFUEL	106.412	9/4/2000
DEGREASER	106.454	9/4/2000
COOL	106.371	9/4/2000

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
5/2/2025	O-3343	RN102905064

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
5/2/2025	O-3343	RN102905064

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
SPRAY	106.261[105659]	11/1/2003[6/13/2022]	Supporting calculations of activities kept
SPRAY	106.262[105659]	11/1/2003[6/13/2022]	Supporting calculations of activities kept
PAINT	106.433[109413]	9/4/2000[5/23/2022]	Records of coatings used, hours used, and supporting calculations
FUGSTILL	106.261[152843]	11/1/2003[8/14/2018]	Supporting calculations of activities kept
PNTSTILL	106.261[152843]	11/1/2003[8/14/2018]	Supporting calculations of activities kept
SLVTK	106.473[152843]	9/4/2000[8/14/2018]	Records of deliveries and supporting calculations
FUGSTILL	106.264[166950]	9/4/2000[11/16/2021]	Supporting calculations of activities kept
PNTSTILL	106.264[166950]	9/4/2000[11/16/2021]	Supporting calculations of activities kept
PLASMA	106.261[167953]	11/1/2003[3/11/2022]	Supporting calculations of activities kept
PLASMA	106.262[167953]	11/1/2003[3/11/2022]	Supporting calculations of activities kept

Permit By Rule Supplemental Table (Page 5)
Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
5/2/2025	O-3343	RN102905064

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
EMGEN	106.511	9/4/2000	Records of hours of operations and supporting calculations
TANK 1	106.473	9/4/2000	Records of deliveries and supporting calculations
TANK 2	106.472	9/4/2000	Records of deliveries and supporting calculations
TANK 3	106.473	9/4/2000	Records of deliveries and supporting calculations
TANK 4	106.472	9/4/2000	Records of deliveries and supporting calculations
TANK 5	106.472	9/4/2000	Records of deliveries and supporting calculations
MIX	106.141	3/7/2013	Supporting calculations of activities kept
WELD	106.227	9/4/2000	Supporting calculations of activities kept
SSM	106.263	11/1/2001	Records of MSS actions and supporting calculations

Permit By Rule Supplemental Table (Page 6)
Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
5/2/2025	O-3343	RN102905064

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
GRIND	106.265	9/4/2000	Supporting calculations of activities kept
RESIN	106.392	9/4/2000	Records of resins and acetone, and supporting calculations of activities kept
REFUEL	106.412	9/4/2000	Supporting calculations of activities kept
DEGREASER	106.454	9/4/2000	Records of solvent usage and supporting calculations of activities kept
COOL	106.371	9/4/2000	Supporting calculations of activities kept

Ms. Haynes
May 2, 2025

ATTACHMENT B

OP-REQ1

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

Date:	5/2/2025
Permit No.:	O-3343
RN No.:	RN102905064

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.: 106.141	Version No./Date: 3/7/2013
PBR No.: 106.227	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
PBR No.: 106.263	Version No./Date: 11/1/2001
PBR No.: 106.264	Version No./Date: 9/4/2000
PBR No.: 106.265	Version No./Date: 9/4/2000
PBR No.: 106.371	Version No./Date: 9/4/2000
PBR No.: 106.392	Version No./Date: 9/4/2000
PBR No.: 106.412	Version No./Date: 9/4/2000
PBR No.: 106.433	Version No./Date: 9/4/2000
PBR No.: 106.454	Version No./Date: 9/4/2000
PBR No.: 106.472	Version No./Date: 9/4/2000
PBR No.: 106.473	Version No./Date: 9/4/2000
PBR No.: 106.511	Version No./Date: 9/4/2000
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:

Ms. Haynes
May 2, 2025

ATTACHMENT C

OP-ACPS

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

Date: 5/2/2025	Regulated Entity No.: RN102905064	Permit No.: O3343
Company Name: Kiewit Offshore Services, Ltd.		Area Name: Ingleside Offshore Platform Fabrication Facilities

- 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>	
<p><small>* 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.</small></p> <p><small>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.</small></p>	

Ms. Haynes
May 2, 2025

ATTACHMENT D

OP-REQ3

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

Table 1a: Additions

Date: 5/2/2025	Regulated Entity No.: RN102905064	Permit No.: O-3343
Company Name: Kiewit Offshore Services, Ltd.	Area Name: Ingleside Offshore Platform Fabrication Facilities	

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)
9	GRP-PAINT	OP-REQ3	63MMMM -0001	HAPS	40 CFR Part 63, Subpart MMMM	§63.3890(a) §63.3890(a)(1) §63.3890(a)(2) §63.3890(a)(3) §63.3890(a)(4) §63.3890(a)(5) §63.3891(b) §63.3892(a) §63.3893(a) §63.3900(a)(1) §63.3900(b)

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

Table 1b: Additions

Date: 5/2/2025	Regulated Entity No.: RN102905064	Permit No.: O-3343
Company Name: Kiewit Offshore Services, Ltd.	Area Name: Ingleside Offshore Platform Fabrication Facilities	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
9	GRP-PAINT	63MMMM-0001	HAPS	None	§63.3930(c)(1) §63.3930(c)(3) §63.3952	None

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

Table 2a: Deletions

Date: 5/2/2025	Regulated Entity No.: RN102905064	Permit No.: O-3343
Company Name: Kiewit Offshore Services, Ltd.	Area Name: Ingleside Offshore Platform Fabrication Facilities	

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)
8	EMGEN	OP-REQ3	60IIII-0001	CO	40 CFR Part 60, Subpart IIII	None
8	EMGEN	OP-REQ3	60IIII-0001	NMHC and NO _x	40 CFR Part 60, Subpart IIII	None
8	EMGEN	OP-REQ3	60IIII-0001	PM	40 CFR Part 60, Subpart IIII	None
9	GRP-PAINT	OP-REQ3	63MMMM-0001	HAPS	40 CFR Part 63, Subpart MMMM	None

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

Table 2b: Deletions

Date: 5/2/2025	Regulated Entity No.: RN102905064	Permit No.: O-3343
Company Name: Kiewit Offshore Services, Ltd.	Area Name: Ingleside Offshore Platform Fabrication Facilities	

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
8	EMGEN	OP-REQ3	60IIII-0001	CO	None	None	[G]§60.4214(d)
8	EMGEN	OP-REQ3	60IIII-0001	NMHC and NO _x	None	None	[G]§60.4214(d)
8	EMGEN	OP-REQ3	60IIII-0001	PM	None	None	[G]§60.4214(d)
9	GRP-PAINT	OP-REQ3	63MMMM-0001	HAPS	§ 63.3960(a)(1) § 63.3960(a)(2) § 63.3960(a)(3) § 63.3960(a)(4) § 63.3964 § 63.3965(a) § 63.3966(a) § 63.3966(b) § 63.3966(c) § 63.3966(d) § 63.3966(e) § 63.3966(f) § 63.3967(a) § 63.3967(c) § 63.3968(a) § 63.3968(c)(1) § 63.3968(f)	§ 63.3930(c)(4)	§ 63.3920(b)

From: [Mike Meister](#)
To: [Alyson Haynes](#)
Cc: [Diana Villenas](#); [Emily Aronson](#)
Subject: RE: [External]Technical Review-FOP O3343/Project 37413 Kiewit Offshore Services LTD, Kiewit Ingleside Fabrication Yard
Date: Thursday, May 8, 2025 1:05:57 PM
Attachments: [image001.png](#)
[OP-REQ3 2025 0508.pdf](#)

Alyson,

Attached is an updated OP-REQ3 addressing your comment below. I wanted to point out an update, however: as we discussed internally which citation was most applicable, we became aware that the citations under discussion apply to a “new” source under the Rule; the source, however, is classified as “existing”. As such, the applicable citations would fall under 63.3890(b). The OP-REQ3 has been updated accordingly.

I also wanted to ask a question – under this rule, 63.3890(c) addresses options to determine the standard if there is a mixture of coating types as specified in 63.3890(b). Is this something that will (or should) be reflected in the applicable requirements summary?

I don’t see any other place in the various forms submitted that this change would affect, so I believe the OP-REQ3 is all that is needed.

Thanks,
Mike

Michael Meister
Principal Consultant

P 512.349.5800
9737 Great Hills Trail, Ste 340 Austin, TX 78759
Email: mmeister@trinityconsultants.com



Connect with us: [LinkedIn](#) / [Facebook](#) / [Twitter](#) / [YouTube](#) / trinityconsultants.com

Stay current on environmental issues. [Subscribe](#) today to receive Trinity’s free *EHS Quarterly*.

From: Alyson Haynes <Alyson.Haynes@tceq.texas.gov>
Sent: Tuesday, May 6, 2025 3:27 PM
To: Mike Meister <MMeister@trinityconsultants.com>
Cc: Diana Villenas <diana.villenas@kiewit.com>
Subject: RE: [External]Technical Review-FOP O3343/Project 37413 Kiewit Offshore Services LTD, Kiewit Ingleside Fabrication Yard

You don't often get email from alyson.haynes@tceq.texas.gov. [Learn why this is important](#)

Hi Mike,

I am reaching out to follow up on the OP-REQ3 that was submitted with the revision packet. 63.3890 is listed as the main standard, however, the main standard must identify specific quantitative emission limits for the appropriate affected source. Please identify one of the following citations (63.3890(a)(1), (a)(2), (a)(3), (a)(4) and (a)(5)) as the main standard based off the affected sources listed in their description by **May 08, 2025**.

Alyson H. Haynes

Title V Permit Reviewer

OA/Air Permits Division/OP Section

MC-163, P.O. Box 13087

Austin, TX 78711-3087

alyson.haynes@tceq.texas.gov

Phone: (512) 239-6207

Fax: (512) 239-1400

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

From: Mike Meister <MMeister@trinityconsultants.com>

Sent: Friday, May 2, 2025 4:36 PM

To: Alyson Haynes <Alyson.Haynes@tceq.texas.gov>

Cc: Diana Villenas <diana.villenas@kiewit.com>

Subject: RE: [External] Technical Review-FOP O3343/Project 37413 Kiewit Offshore Services LTD, Kiewit Ingleside Fabrication Yard

Alyson,

Attached please find responses to your questions from 4/28/2025 for the above-referenced permit. Let us know if you need additional information or have further questions.

Thanks,

Mike

Michael Meister
Principal Consultant

P 512.349.5800
9737 Great Hills Trail, Ste 340 Austin, TX 78759
Email: mmeister@trinityconsultants.com



Connect with us: [LinkedIn](#) / [Facebook](#) / [Twitter](#) / [YouTube](#) / trinityconsultants.com

Stay current on environmental issues. [Subscribe](#) today to receive Trinity's free *EHS Quarterly*.

From: Alyson Haynes <Alyson.Haynes@tceq.texas.gov>
Sent: Friday, May 2, 2025 10:18 AM
To: Mike Meister <MMeister@trinityconsultants.com>
Subject: RE: [External]Technical Review-FOP O3343/Project 37413 Kiewit Offshore Services LTD, Kiewit Ingleside Fabrication Yard

Hi Mike,

I hope you are having pleasant Friday morning!

Referring to our conversation yesterday morning, please submit a revised OP-ACPS form that is marked questions B.1 – Yes and B.2 – No. Part 2 of the form does NOT need to be submitted. Please let me know if you have any further questions.

Best Regards,

Alyson H. Haynes
Title V Permit Reviewer
TCEQ – APD – OP Section (Title V)
(512) 239-6207

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

From: Alyson Haynes
Sent: Thursday, May 1, 2025 4:31 PM
To: Mike Meister <MMeister@trinityconsultants.com>

Subject: RE: [External]Technical Review-FOP O3343/Project 37413 Kiewit Offshore Services LTD,
Kiewit Ingleside Fabrication Yard

Hi Mike,

I just wanted to follow up on our conversation from this morning. We are reviewing TCEQ procedure and should have directions for how to proceed with the OP-ACPS form this evening or early tomorrow morning.

Alyson H. Haynes

Title V Permit Reviewer

OA/Air Permits Division/OP Section

MC-163, P.O. Box 13087

Austin, TX 78711-3087

alyson.haynes@tceq.texas.gov

Phone: (512) 239-6207

Fax: (512) 239-1400

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

From: Mike Meister <MMeister@trinityconsultants.com>

Sent: Wednesday, April 30, 2025 4:06 PM

To: Alyson Haynes <Alyson.Haynes@tceq.texas.gov>

Subject: RE: [External]Technical Review-FOP O3343/Project 37413 Kiewit Offshore Services LTD,
Kiewit Ingleside Fabrication Yard

Teams is fine with me. Is 10AM good?

Michael Meister
Principal Consultant

P 512.349.5800

9737 Great Hills Trail, Ste 340 Austin, TX 78759

Email: mmeister@trinityconsultants.com



Connect with us: [LinkedIn](#) / [Facebook](#) / [Twitter](#) / [YouTube](#) / trinityconsultants.com

Stay current on environmental issues. [Subscribe](#) today to receive Trinity's free *EHS Quarterly*.

From: Alyson Haynes <Alyson.Haynes@tceq.texas.gov>

Sent: Wednesday, April 30, 2025 3:01 PM

To: Mike Meister <MMeister@trinityconsultants.com>

Subject: RE: [External]Technical Review-FOP O3343/Project 37413 Kiewit Offshore Services LTD, Kiewit Ingleside Fabrication Yard

Hi Mike,

I am having some phone issue right now, would a teams call work? I am available any time before 11.

Best Regards,

Alyson H. Haynes

Title V Permit Reviewer

TCEQ – APD – OP Section (Title V)

(512) 239-6207

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

From: Mike Meister <MMeister@trinityconsultants.com>

Sent: Wednesday, April 30, 2025 2:50 PM

To: Alyson Haynes <Alyson.Haynes@tceq.texas.gov>

Cc: Diana Villenas <diana.villenas@kiewit.com>

Subject: FW: [External]Technical Review-FOP O3343/Project 37413 Kiewit Offshore Services LTD, Kiewit Ingleside Fabrication Yard

Importance: High

Hi, Alyson,

I am assisting Kiewit in responding to your requests. On two of the items, I had some brief (largely procedural) questions that I'd like to share with you as Kiewit prepares its response. Would you be available for a call tomorrow? I don't anticipate it taking more than 10 minutes.

Thanks!

Mike

Michael Meister
Principal Consultant

P 512.349.5800
9737 Great Hills Trail, Ste 340 Austin, TX 78759
Email: mmeister@trinityconsultants.com



Connect with us: [LinkedIn](#) / [Facebook](#) / [Twitter](#) / [YouTube](#) / trinityconsultants.com

Stay current on environmental issues. [Subscribe](#) today to receive Trinity's free *EHS Quarterly*.

From: Alyson Haynes <Alyson.Haynes@tceq.texas.gov>

Sent: Monday, April 28, 2025 2:36 PM

To: Diana Villenas <diana.villenas@kiewit.com>

Subject: [External]Technical Review-FOP O3343/Project 37413 Kiewit Offshore Services LTD, Kiewit Ingleside Fabrication Yard

You don't often get email from alyson.haynes@tceq.texas.gov. [Learn why this is important](#)

Ms. Villenas,

While conducting my review of the renewal application for Kiewit Offshore Services LTD, Kiewit Ingleside Fabrication Yard, I have determined that additional information is necessary to complete the review.

Please provide the following items no later than **May 2, 2025:**

- PBRs 106.371 and 106.452 are listed in the current effective permit, however, they are not included in the renewal application. If these PBRs are still in use, submit a revised OP-REQ1 page 88 and a revised OP-PBRSUP that include PBRs 106.371 and 106.452. Ensure that the revised documents include the updated submittal date. If the PBRs are no longer in use and should be removed from the permit provide an OP-2 with the revisions.

- Please review the [form instructions](#) and revise the OP-ACPS form submitted on February 5, 2025 to reflect only the citation of the applicable requirement associated with the non-compliance situation.
- For GRP-PAINT the OP-REQ3 form identifies citation 63.3890(a) for MACT MMMM. It does not identify the specific citations under 63.3890(a) which are 63.3890(a)(1), (a)(2), (a)(3), (a)(4) and (a)(5). Please identify each citation that applies by submitting an updated OP-REQ3. These citations will be used as the main standards and will be listed as separate rows in the applicable requirements summary table. If there are citations in the monitoring, testing and recordkeeping columns that only apply to a specific main standard citation make updates to those citations on the OP-REQ3 as well.

Additionally, the application cover letter states that with the renewal, the Major NSR Summary Table will be revised. Since the current effective permit does not contain a Major NSR Summary Table it seems like this is a typo. No Major NSR Summary table will be added to this permit.

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.

Best Regards,

Alyson H. Haynes

Title V Permit Reviewer

TCEQ – APD – OP Section (Title V)

(512) 239-6207

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

From: [Alyson Haynes](#)
To: Diana.Villenas@kiewit.com
Subject: Technical Review -- FOP 03343/Project 37412, Kiewit Offshore Services LTD, Ingleside Offshore Platform Fabrication Facilities
Date: Thursday, December 19, 2024 9:55:00 AM

Ms. Diana Villenas

I have been assigned to the Federal Operating Permit (FOP) renewal application of Permit No. 03343 for Kiewit Offshore Services Ltd, Ingleside Offshore Platform Fabrication Facilities. This application has been assigned Project No. 37413. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

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

Please notify me when these updates have been submitted.

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

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,

Alyson H. Haynes

Title V Permit Reviewer

OA/Air Permits Division/OP Section

MC-163, P.O. Box 13087

Austin, TX 78711-3087

alyson.haynes@tceq.texas.gov

Phone: (512) 239-6207

Fax: (512) 239-1400



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



9737 Great Hills Trail, Suite 340, Austin, TX 78759 / P 713-955-1230 / F (713) 955-1201 / trinityconsultants.com

February 5th, 2025

Mr. Johnny Bowers
Texas Commission on Environmental Quality
Air Permits Initial Review Team (APIRT), MC 161
12100 Park 35 Circle
Building C, Third Floor
Austin, TX, 78753

**Re: Application for Renewal
Title V Permit 03343
Kiewit Offshore Services, Ltd.
RN102905064 / CN604333369**

Mr. Bowers:

On behalf of Kiewit Offshore Services, Ltd., Trinity Consultants is hereby submitting this application for a renewal of Site Operating Permit No. 03343 for the Kiewit Ingleside Fabrication Yard in San Patricio County. With this application, the major NSR Summary Table is being revised.

If you have any questions or require additional information, please feel free to contact me at 512-349-5800 or mmeister@trinityconsultants.com.

Sincerely,
Trinity Consultants

A handwritten signature in black ink that reads "Michael Meister". The signature is written in a cursive, flowing style.

Michael Meister
Principal Consultant

Enclosure

cc: Ms. Diana Villenas, District Environmental Manager, Kiewit Offshore Services, Ltd., Ingleside, TX (email)
Ms. Kelly Ruble, Air Section Manager, TCEQ Region 14, Corpus Christi, TX
EPA, Region 6. (R6AirPermitsTX@epa.gov)

HEADQUARTERS

12700 Park Central Dr, Ste 2100, Dallas, TX 75251 / P 800.229.6655 / P 972.661.8100 / F 972.385.9203

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

Date: 2/5/2025	Regulated Entity No.: RN102905064	Permit No.: O-3343
Company Name: Kiewit Offshore Services, Ltd.		Area Name: Kiewit Ingleside Fabrication Yard

- 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>	
<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: 2/5/2025	Regulated Entity No.: RN102905064	Permit No.: O-3343
Company Name: Kiewit Offshore Services, Ltd.		Area Name: Kiewit Ingleside Fabrication Yard

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): GRP-PAINT	
SOP Index No.: 63MMMM	
Pollutant: HAPS	
Applicable Requirement	
Citation	Text Description
§63.3960(a)(1)	All emission capture systems must be installed and operating by the compliance date and conducting periodic performance tests.
§63.3960(a)(2)	Developing and implementing a work practice plan
§63.3960(a)(3)	Initial Compliance Demonstration
§63.3960(a)(4)	Initial Compliance Demonstration regarding initial performance tests
§63.3964	Performance test requirements
§63.3965(a)	Emission capture system efficiency assumed to be 100%
§63.3966(a)	Add-on control device efficiency determination using different methods
§63.3966(b)	Add-on control device efficiency determination using different methods
§63.3966(c)	Add-on control device efficiency determination
§63.3966(d)	Add-on control device efficiency determination
§63.3966(e)	Add-on control device efficiency determination
§63.3966(f)	Add-on control device efficiency determination
§63.3967(a)	Establishing operating limits for thermal oxidizers
§63.3967(c)	Establishing operating limits for regenerative carbon adsorbers

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

Date: 2/5/2025	Regulated Entity No.: RN102905064	Permit No.: O-3343
Company Name: Kiewit Offshore Services, Ltd.		Area Name: Kiewit Ingleside Fabrication Yard

Part 2 (continued)

Citation	Text Description
§63.3968(a)	CPMS installation, operating, and maintenance requirements
§63.3968(c)(1)	Thermal oxidizers gas temperature monitoring requirements
§63.3968(f)	Concentrator requirements
§63.3930(c)(4)	Records required for add-on controls option
§63.3920(b)	Performance test reports requirements

2. Compliance Status Assessment Method and Records Location

Citation	Text Description	Location of Records/Documentation
§63.3960(a)(1)	Conduct performance tests	Records kept onsite
§63.3960(a)(2)	Implement work practice plan	Records kept onsite
§63.3960(a)(3)	Initial compliance demonstration	Records kept onsite
§63.3960(a)(4)	Initial compliance demonstration	Records kept onsite
§63.3964	Conduct performance tests	Records kept onsite
§63.3965(a)	Capture system meets Method 204 (40 CFR part 51, Appendix M) or all operations are applied within the capture system	Records kept onsite
§63.3966(a)	Test Method 1 or 1A (40 CFR part 60, Appendix A), Test Method 2, 2A, 2C, 2D, 2F, or 2G (40 CFR part 60, Appendix A), Test method 3, 3A, or 3B (40 CFR part 60, Appendix A), Test method 4 (40 CFR part 60, Appendix A)	Records kept onsite
§63.3966(b)	Test method 25, 25A (40 CFR part 60, Appendix A-7)	Records kept onsite
§63.3966(c)	Measured emissions at outlet of control device	Records kept onsite
§63.3966(d)	Measured gaseous organic emissions at inlet and outlet of control device using Equation 1	Records kept onsite

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

Date: 2/5/2025	Regulated Entity No.: RN102905064	Permit No.: O-3343
Company Name: Kiewit Offshore Services, Ltd.		Area Name: Kiewit Ingleside Fabrication Yard

Part 2 (continued)

Citation	Text Description	Location of Records/Documentation
§63.3966(e)	Determine control device efficiency using Equation 2	Records kept onsite
§63.3966(f)	Determine control device efficiency as an average using Equation 2	Records kept onsite
§63.3967(a)	Thermal oxidizer performance tests	Records kept onsite
§63.3967(c)	Establish operating limits and monitor regenerative carbon adsorbers	Records kept onsite
§63.3968(a)	Install, operate, and maintain CPMS	Records kept onsite
§63.3968(c)(1)	Gas temperature monitor in firebox of the thermal oxidizer	Records kept onsite
§63.3968(f)	Install temperature monitor in the desorption gas stream. Monitor the pressure drop across the wheel or bed	Records kept onsite
§63.3930(c)(4)	Record the calculations used to comply with the add-on controls option	Records kept onsite
§63.3920(b)	Report Performance Tests	Records kept onsite

3. Non-compliance Situation Description

Did not comply with MACT MMMM requirements using the add-on control option listed in Title V permit. Complied with MACT MMMM requirements without add-on controls option. Please see additional description in the executive summary of the report.

4. Corrective Action Plan Description

Submitting this minor revision to correct the Title V representations of their MACT MMMM compliance.

5. List of Activities/Milestones to Implement the Corrective Action Plan

Submit this Title V revision application to revise the referenced requirements.

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

Date: 2/5/2025	Regulated Entity No.: RN102905064	Permit No.: O-3343
Company Name: Kiewit Offshore Services, Ltd.		Area Name: Kiewit Ingleside Fabrication Yard

Part 2 (continued)

6. Previously Submitted Compliance Plan(s)	
Type of Action	Date Submitted
N/A	
7. Progress Report Submission Schedule	

Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 10)
Federal Operating Permit Program
Table 5a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/5/2025	O3343	RN102905064

Unit ID No.	SOP/GOP Index No.	Applicability Date	Exemptions	Service	Commencing	Manufacture Date
EMGEN	60IIII-0001	2005+	NONE	EMERG	CON	0406+

**Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 11)**

Federal Operating Permit Program

Table 5b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

**Subpart IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
2/5/2025	O3343	RN102905064

Unit ID No.	SOP/GOP Index No.	Diesel	AES No.	Displacement	Generator Set	Model Year	Install Date
EMERG	60IIII-0001	DIESEL		10-CS		2013	

Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 12)
Federal Operating Permit Program
Table 5c: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
2/5/2025	O3343	RN102905064

Unit ID No.	SOP/GOP Index No.	Kilowatts	Filter	AECD	Standard	Compliance Option	PM Compliance	Options
EMERG	60IIII-0001	E130-368		NO	YES	MANU YES		

From: [Emily Aronson](#)
To: [Alyson Haynes](#)
Cc: [Brenda.Douglass](#); [Hannah.Johnson](#); [Diana.Villenas](#); [Mike Meister](#)
Subject: RE: [External]Technical Review-FOP 03343/Project 37413 Kiewit Offshore Services LTD, Kiewit Ingleside Fabrication Yard
Date: Wednesday, February 5, 2025 4:40:53 PM
Attachments: [image003.png](#)
[Cover letter 2025-0203.pdf](#)
[OP-ACPS 2025 0205.pdf](#)
[OP-UA2 2025 0203.pdf](#)

Good Afternoon Ms. Haynes,

We have attached the updated requested documents here on Kiewit Offshore Services behalf. We have included the entire OP-UA2 table 5 for completeness. Please let us know if you have any additional questions or need any other information. We look forward to working with you on this project.

Thank you,

.....
Emily Aronson, EIT | Associate Consultant – Corpus Christi

555 N Carancahua St | Ste 820 | Corpus Christi, TX 78401

[Trinity Consultants](#) | E: Emily.Aronson@trinityconsultants.com | P: (361) 235-3358



From: Alyson Haynes <Alyson.Haynes@tceq.texas.gov>

Sent: Thursday, January 30, 2025 3:50 PM

To: Diana.Villenas <Diana.Villenas@kiewit.com>

Subject: [External]Technical Review-FOP 03343/Project 37413 Kiewit Offshore Services LTD, Kiewit Ingleside Fabrication Yard

You don't often get email from alyson.haynes@tceq.texas.gov. [Learn why this is important](#)

Dear Ms. Villenas,

I have started the technical review of the renewal application for Kiewit Offshore Services LTD, Kiewit Ingleside Fabrication Yard and have determined that additional information is necessary to complete the review.

Please provide the following items no later than **February 5, 2025:**

- Submit Form [OP-ACPS](#). This form is required for renewal applications.
- Submit an updated OP-UA2; Pg.12, Table 5c for 40 CFR Part 60 Subpart IIII for unit EMGEN. Based on the form instructions a response is required for AECD.

- The cover letter submitted in the application refers to permit No. O3319. Submit a revised cover letter for permit No. O3343.

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.

Best Regards,

Alyson H. Haynes
Title V Permit Reviewer
TCEQ – APD – OP Section (Title V)
(512) 239-6207



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

From: [Alyson Haynes](#)
To: Diana.Villenas@kiewit.com
Subject: Technical Review -- FOP 03343/Project 37412, Kiewit Offshore Services LTD, Ingleside Offshore Platform Fabrication Facilities
Date: Thursday, December 19, 2024 9:55:00 AM

Ms. Diana Villenas

I have been assigned to the Federal Operating Permit (FOP) renewal application of Permit No. 03343 for Kiewit Offshore Services Ltd, Ingleside Offshore Platform Fabrication Facilities. This application has been assigned Project No. 37413. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

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

Please notify me when these updates have been submitted.

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

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,

Alyson H. Haynes

Title V Permit Reviewer

OA/Air Permits Division/OP Section

MC-163, P.O. Box 13087

Austin, TX 78711-3087

alyson.haynes@tceq.texas.gov

Phone: (512) 239-6207

Fax: (512) 239-1400



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

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 3, 2024

THE HONORABLE MORGAN LAMANTIA
TEXAS SENATE
PO BOX 12068
AUSTIN TX 78711-2068

Re: Accepted Federal Operating Permit Renewal Application
Project Number: 37413
Permit Number: O3343
KIEWIT OFFSHORE SERVICES LTD
Ingleside Offshore Platform Fabrication Facilities
Ingleside, San Patricio County
Regulated Entity Number: RN102905064
Customer Reference Number: CN604333369

Dear Senator Lamantia:

This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) renewal application for a site located in your district. As part of this permitting process, the applicant is required to publish a formal newspaper public notice. The notice will inform the public of their right to make comments or request a public hearing. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. <https://gisweb.tceq.texas.gov/LocationMapper/?marker=-97.23,27.851666&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 Morgan Lamantia
Page 2
December 3, 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

December 3, 2024

THE HONORABLE JOSE M LOZANO
TEXAS HOUSE OF REPRESENTATIVES
PO BOX 2910
AUSTIN TX 78768-2910

Re: Accepted Federal Operating Permit Renewal Application
Project Number: 37413
Permit Number: O3343
KIEWIT OFFSHORE SERVICES LTD
Ingleside Offshore Platform Fabrication Facilities
Ingleside, San Patricio County
Regulated Entity Number: RN102905064
Customer Reference Number: CN604333369

Dear Representative Lozano:

This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) renewal application for a site located in your district. As part of this permitting process, the applicant is required to publish a formal newspaper public notice. The notice will inform the public of their right to make comments or request a public hearing. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. <https://gisweb.tceq.texas.gov/LocationMapper/?marker=-97.23,27.851666&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



9737 Great Hills Trail, Suite 340, Austin, TX 78759 / P 713-955-1230 / F (713) 955-1201 / trinityconsultants.com

November 18, 2024

Mr. Johnny Bowers
Texas Commission on Environmental Quality
Air Permits Initial Review Team (APIRT), MC 161
12100 Park 35 Circle
Building C, Third Floor
Austin, TX, 78753

**Re: Application for Renewal
Title V Permit 03343
Kiewit Offshore Services, Ltd.
RN102905064 / CN604333369**

Mr. Bowers:

On behalf of Kiewit Offshore Services, Ltd., Trinity Consultants is hereby submitting this application for a renewal of Site Operating Permit No. 03319 for the Kiewit Ingleside Fabrication Yard in San Patricio County. With this application, the major NSR Summary Table is being revised.

If you have any questions or require additional information, please feel free to contact me at 512-349-5800 or mmeister@trinityconsultants.com.

Sincerely,
Trinity Consultants

A handwritten signature in black ink that reads "Michael Meister". The signature is written in a cursive, flowing style.

Michael Meister
Principal Consultant

Enclosure

cc: Ms. Diana Villenas, District Environmental Manager, Kiewit Offshore Services, Ltd., Ingleside, TX (email)
Ms. Kelly Ruble, Air Section Manager, TCEQ Region 14, Corpus Christi, TX
EPA, Region 6. (R6AirPermitsTX@epa.gov)

HEADQUARTERS

12700 Park Central Dr, Ste 2100, Dallas, TX 75251 / P 800.229.6655 / P 972.661.8100 / F 972.385.9203

TITLE V PERMIT RENEWAL APPLICATION



Kiewit Offshore Services, Ltd.

Ingleside Facility – Ingleside, TX

CN: 604333369

RN: 102905064

Prepared By:

TRINITY CONSULTANTS

555 N. Carancahua Street

Suite 820

Corpus Christi, TX 78401

(361) 883-1668

November 2024

Project 244403.0054



TABLE OF CONTENTS

1. EXECUTIVE SUMMARY	1-1
2. ADMINISTRATIVE FORMS	2-1
3. PROCESS DESCRIPTION	3-1
3.1 Blasting Operations	3-1
3.2 Organic and Inorganic Coating of Metal Parts.....	3-1
3.3 Thermal Spray Application	3-2
3.4 Paint Booths.....	3-2
3.5 Fireproofing Application	3-2
3.6 Aerosol Spray Painting and Aerosol Can Crushing:.....	3-2
3.7 Equipment Cleanup	3-2
3.8 Solvent Distillation Units	3-3
3.9 Miscellaneous Operations – Sawing, Grinding, Cutting, Rolling, Drilling, and Welding Operations	3-3
4. APPLICABLE REQUIREMENTS SUMMARY FORMS	4-1

1. EXECUTIVE SUMMARY

Kiewit Offshore Services, Ltd. (KOS) owns and operates an offshore platform fabrication facility located at 2440 Kiewit Road in Ingleside, San Patricio County, Texas (Ingleside Facility). KOS has been assigned Texas Commission on Environmental Quality (TCEQ) Customer Reference Number (CN) 604333369. The Ingleside Facility has been assigned TCEQ Regulated Entity Reference Number (RN) 102905064 and TCEQ Air Quality Account Number SD-0184-W. Operations at the Ingleside Facility are authorized under New Source Review (NSR) Permit Number (No.) 47227, various non-registered Permits by Rule (PBR) claimed by the Ingleside Facility, in addition to PBR Registration Nos. 105659, 109413, 152843, 167953, 105659, and 175559. The Ingleside Facility is a major source with respect to the federal operating permits (Title V) program and operates under Federal Operating Permit (FOP) O-3343.

With this application, KOS is requesting the following revisions in addition to the renewal, which collectively represent a minor revision to the existing TV SOP:

- ▶ Addition of PBRs 106.261 and 106.262 [Registration No. 167953] to the current permit's New Source Authorization References;
- ▶ Addition of PBR 106.433 [Registration No. 109413] to the current permit's New Source Authorization References;
- ▶ Addition of PBRs 106.261 and 106.262 [Registration No. 105659] to the current permit's New Source Authorization References;
- ▶ Addition of PBR 106.146 [Registration No. 175559] to the current permit's New Source Authorization References;
- ▶ Revision of permit representations based on amendments to the NSR permit No. 47227.

Additionally, this application will revise the referenced MACT MMMM requirements to reflect the actual operation of the Ingleside facility. The permit currently references the compliance option with add-on controls, but the Ingleside facility complies using the compliance option without add-on controls. This update is not due to any change at the site, but rather addresses an error in the current Title V permit.

This document was prepared in accordance with TCEQ's SOP Revision Application Guidance¹ and the requirements listed in 30 TAC §122.132, Application and Required Information for Initial Permit Issuance, Reopening, Renewal, or General Operating Permits.

The enclosed Title V SOP application for KOS consists of the required forms and information.

¹ TCEQ Air Permits Division, *Site Operating Permit Revision Guidance*

https://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop-revision-5951.pdf, Dated: January 2021.

2. ADMINISTRATIVE FORMS

This section contains the following forms and information:

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

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

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

I. Identifying Information
RN: RN102905064
CN: CN604333369
Account No.: SD-0184-W
Permit No.: O-3343
Project No.: TBA
Area Name: Kiewit Ingleside Fabrication Yard
Company Name: Kiewit Offshore Services, Ltd. (KOS)
II. Certification Type <i>(Please mark appropriate box)</i>
<input checked="" type="checkbox"/> Responsible Official Representative <input type="checkbox"/> Duly Authorized
III. Submittal Type <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>
<input type="checkbox"/> SOP/TOP Initial Permit Application <input checked="" type="checkbox"/> Permit Revision, Renewal, or Reopening
<input type="checkbox"/> GOP Initial Permit Application <input type="checkbox"/> Update to Permit Application
<input type="checkbox"/> Other: _____

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

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

IV. Certification of Truth			
This certification does not extend to information which is designated by TCEQ as information for reference only.			
I, <u>Fuat Sezer</u>		certify that I am the <u>RO</u>	
<i>(Certifier Name printed or typed)</i>		<i>(RO or DAR)</i>	
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete: <i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>			
Time Period: From _____		to _____	
<i>(Start Date)</i>		<i>(End Date)</i>	
Specific Dates: <u>11/18/2024</u>			
<i>(Date 1)</i>		<i>(Date 2)</i>	
<i>(Date 3)</i>		<i>(Date 4)</i>	
<i>(Date 5)</i>		<i>(Date 6)</i>	
Signature: <u>Fuat Sezer</u>		Signature Date: <u>Nov-18, 2024</u>	
Title: <u>District Manager</u>			

Form OP-DEL
Delegation of Responsible Official Information
Federal Operating Permit Program
Texas Commission on Environmental Quality

III. Certification of Truth, Accuracy, and Completeness

I, Fuat Sezer

(Name printed or typed: RO for New DAR Identification; RO or DAR for Administrative Information Change)

Certify that, based on information and belief formed after reasonable inquiry, the statements, and information stated above are true, accurate, and complete. *(RO signature required for New DAR Identification only; DAR signature required for any Action Type)*

Responsible Official Signature: Fuat Sezer

Date: Nov - 18, 2024

Duly Authorized Representative Signature: Todd Brennan

(Name(s) printed or typed)

Date: 11/18/2024

IV. Removal of Duly Authorized Representative(s)

The following should be removed as Duly Authorized Representative(s):

(Name(s) printed or typed)

Effective Date: _____

Responsible Official Signature: _____

Date: _____

Form OP-DEL
Delegation of Responsible Official Information
Federal Operating Permit Program
Texas Commission on Environmental Quality

I. Identifying Information
Account Number: SD-0184-W
Regulated Entity Number: RN102905064
Customer Reference Number: CN604333369
Permit Number: O-3343
Area Name: Ingleside Offshore Platform Fabrication Facilities
Company Name: Kiewit Offshore Services, Ltd.
II. Duly Authorized Representative Information
Action Type: <input checked="" type="checkbox"/> New DAR Identification <input type="checkbox"/> Administrative Information Change
Conventional Title: <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.
Name (Driver License/STEERS): Todd Brennan
Title: Vice President
Delegation Effective Date: 11/18/2024
Telephone Number: (817) 471-6010
Fax Number:
Company Name: Kiewit Offshore Services, Ltd.
Mailing Address: 2440 Kiewit Road
City: Ingleside
State: TX
ZIP Code: 78362
Email Address: Todd.brennan@kiewit.com

**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: Kiewit Offshore Services, Ltd.
B. Customer Reference Number (CN): CN604333369
C. Submittal Date (mm/dd/yyyy): 11/18/2024
II. Site Information
A. Site Name: Kiewit Ingleside Fabrication Yard
B. Regulated Entity Reference Number (RN): RN102905064
C. Indicate affected state(s) required to review permit application: <i>(Check the appropriate box[es].)</i>
<input type="checkbox"/> AR <input type="checkbox"/> CO <input type="checkbox"/> KS <input type="checkbox"/> LA <input type="checkbox"/> NM <input type="checkbox"/> OK <input checked="" type="checkbox"/> N/A
D. Indicate all pollutants for which the site is a major source based on the site's potential to emit: <i>(Check the appropriate box[es].)</i>
<input checked="" type="checkbox"/> VOC <input type="checkbox"/> NO _x <input type="checkbox"/> SO ₂ <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> CO <input type="checkbox"/> Pb <input checked="" type="checkbox"/> HAPS
Other:
E. Is the site a non-major source subject to the Federal Operating Permit Program? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
F. Is the site within a local program area jurisdiction? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
G. Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
H. Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:
III. Permit Type
A. Type of Permit Requested: <i>(Select only one response)</i>
<input checked="" type="checkbox"/> Site Operating Permit (SOP) <input type="checkbox"/> Temporary Operating Permit (TOP) <input type="checkbox"/> General Operating Permit (GOP)

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

IV. Initial Application Information <i>(Complete for Initial Issuance Applications Only.)</i>
A. Is this submittal an abbreviated or a full application? <input type="checkbox"/> Abbreviated <input 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: Fuat Sezer
RO Title: District Manager
Employer Name: Kiewit Offshore Services, Ltd.
Mailing Address: 2440 Kiewit Road
City: Ingleside
State: TX
ZIP Code: 78362
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 361-775-4350
Fax No.:
Email: Fuat.Sezer@kiewit.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: Diana Villenas
Technical Contact Title: District Environmental Manager
Employer Name: Kiewit Offshore Services, Ltd.
Mailing Address: 2440 Kiewit Road
City: Ingleside
State: TX
ZIP Code: 78362
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 361-244-1270
Fax No.:
Email: Diana.Villenas@kiewit.com
VIII. Reference Only Requirements <i>(For reference only.)</i>
A. State Senator: Morgan LaMantia
B. State Representative: J.M. Lozano
C. Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
D. Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
E. Indicate the alternate language(s) in which public notice is required: Spanish

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

IX. Off-Site Permit Request <i>(Optional for applicants requesting to hold the FOP and records at an off-site location.)</i>
A. Office/Facility Name:
B. Physical Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
C. Physical Location:
D. Contact Name Prefix: (<input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Contact Full Name:
E. Telephone No.:
X. Application Area Information
A. Area Name: Ingleside Offshore Platform Fabrication Facilities
B. Physical Address: 2440 Kiewit Rd.
City: Ingleside
State: TX
ZIP Code: 78362-5101
C. Physical Location:
D. Nearest City:
E. State:
F. ZIP Code:

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

X. Application Area Information (continued)
G. Latitude (nearest second): 27.85167
H. Longitude (nearest second): -97.23
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: 17
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: Ingleside Public Library
B. Physical Address: 2775 Waco Street
City: Ingleside
ZIP Code: 78362
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: Diana Villenas
Contact Mailing Address: 2440 Kiewit Rd.
City: Ingleside
State: TX
ZIP Code: 78362
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 361-244-1270

**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.)
DR Full Name:
DR Title:
Employer Name:
Mailing Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.:
Fax No.:
Email:

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

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

XIV. Alternate Designated Representative (ADR) Identifying Information

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

ADR Full Name:

ADR Title:

Employer Name:

Mailing Address:

City:

State:

ZIP Code:

Territory:

Country:

Foreign Postal Code:

Internal Mail Code:

Telephone No.:

Fax No.:

Email:

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

Date: 11/18/2024	
Permit No.: O-3343	
Regulated Entity No.: RN102905064	
Company Name: Kiewit Offshore Services, Ltd.	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
I. Application Type	
Indicate the type of application:	
<input checked="" type="checkbox"/> Renewal	
<input type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
<input type="checkbox"/> Significant Revision	
<input type="checkbox"/> Revision Requesting Prior Approval	
<input type="checkbox"/> Administrative Revision	
<input type="checkbox"/> Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only <input 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: 11/18/2024
Permit No.: O-3343
Regulated Entity No.: RN102905064
Company Name: Kiewit Offshore Services, Ltd.

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

			Unit/Group	Process		
Revision No.	Revision Code	New Unit	ID No.	Applicable Form	NSR Authorization	Description of Change and Provisional Terms and Conditions
1	MS-A	YES	PLASMA	OP-PBR SUP	106.261/11/01/2003[167953], 106.262/11/01/2003[167953]	Plasma Cutter added through PBR Registration No. 167953
2	MS-A	NO	GRP-PAINT		47227	Increased maximum outdoor blasting rates, night-time abrasive blasting added, and updated representation of shrouds.
3	MS-A	YES	PAINT	OP-PBR SUP	106.433/9/04/2000[109413]	Updated PBR Surface Coating Representations through PBR Registration No. 109413
4	MS-A	YES	SPRAY	OP-PBR SUP	106.261/11/01/2003[105659], 106.262/11/01/2003[105659]	Updated PBR Aerosol Can Puncturing Unit representations through PBR Registration No. 105659
5	MS-A	YES	SILO 1	OP-PBR SUP	106.146/9/04/2000[175559]	Soil Stabilization Project unit added through PBR Registration No. 175559

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

Date: 11/18/2024
Permit No.: O-3343
Regulated Entity No.: RN102905064
Company Name: Kiewit Offshore Services, Ltd.

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

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
6	MS-A	YES	SILO 2	OP-PBRSUP	106.146/9/04/2000[175559]	Soil Stabilization Project unit added through PBR Registration No. 175559
7	MS-A	YES	MIXING	OP-PBRSUP	106.146/9/04/2000[175559]	Soil Stabilization Project unit added through PBR Registration No. 175559
8	MS-A	NO	EMGEN	OP-REQ3	106.511/9/04/2000	Revised applicable reporting requirements.
9	MS-A	NO	GRP-PAINT	OP-REQ3	47227	Revised applicable MACT MMMM Standards

**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.
11/18/2024	O-3343	RN102905064

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	1	PLASMA	OP- PBR SUP	Plasma Cutting Operations		106.261/11/01/2003[167953], 106.262/11/01/2003[167953]	
	2	GRP-PAINT		Surface Coating Operations		47227	
A	3	PAINT	OP- PBR SUP	Surface Coating Operations		106.433/9/04/2000[167953]	
A	4	SPRAY	OP- PBR SUP	Aerosol Can Puncturing Unit		106.261/11/01/2003[105659], 106.262/11/01/2003[105659]	
A	5	SILO 1	OP- PBR SUP	Soil Stabilization Operations		106.146/9/04/2000[175559]	
A	6	SILO 2	OP- PBR SUP	Soil Stabilization Operations		106.146/9/04/2000[175559]	
A	7	MIXING	OP- PBR SUP	Soil Stabilization Operations		106.146/9/04/2000[175559]	
	8	EMGEN	OP-REQ3	SRIC Engines		106.511/9/04/2000	
	9	GRP-PAINT	OP-REQ3	Surface Coating Operations		47227	

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.

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
11/18/2024	O-3343	RN102905064

Unit ID No.	Registration No.	PBR No.	Registration Date
SPRAY	105659	106.261	6/13/2022
SPRAY	105659	106.262	6/13/2022
PAINT	109413	106.433	5/23/2022
FUGSTILL	152843	106.261	8/14/2018
PNTSTILL	152843	106.261	8/14/2018
SLVTK	152843	106.473	8/14/2018
FUGSTILL	166950	106.264	11/16/2021
PNTSTILL	166950	106.264	11/16/2021
PLASMA	167953	106.261	3/11/2022
PLASMA	167953	106.262	3/11/2022
SILO 1	175559	106.146	4/17/2024
SILO 2	175559	106.146	4/17/2024
MIXING	175559	106.146	4/17/2024

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
11/18/2024	O-3343	RN102905064

Unit ID No.	PBR No.	Version No./Date
EMGEN	106.511	9/4/2000
TANK 1	106.473	9/4/2000
TANK 2	106.472	9/4/2000
TANK 3	106.473	9/4/2000
TANK 4	106.472	9/4/2000
TANK 5	106.472	9/4/2000
MIX	106.141	3/7/2013
WELD	106.227	9/4/2000
SSM	106.263	11/1/2001
GRIND	106.265	9/4/2000
RESIN	106.392	9/4/2000
REFUEL	106.412	9/4/2000
DEGREASER	106.454	9/4/2000

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

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
11/18/2024	O-3343	RN102905064

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
SPRAY	106.261[105659]	11/1/2003[6/13/2022]	Supporting calculations of activities kept
SPRAY	106.262[105659]	11/1/2003[6/13/2022]	Supporting calculations of activities kept
PAINT	106.433[109413]	9/4/2000[5/23/2022]	Records of coatings used, hours used, and supporting calculations
FUGSTILL	106.261[152843]	11/1/2003[8/14/2018]	Supporting calculations of activities kept
PNTSTILL	106.261[152843]	11/1/2003[8/14/2018]	Supporting calculations of activities kept
SLVTK	106.473[152843]	9/4/2000[8/14/2018]	Records of deliveries and supporting calculations
FUGSTILL	106.264[166950]	9/4/2000[11/16/2021]	Supporting calculations of activities kept
PNTSTILL	106.264[166950]	9/4/2000[11/16/2021]	Supporting calculations of activities kept
PLASMA	106.261[167953]	11/1/2003[3/11/2022]	Supporting calculations of activities kept
PLASMA	106.262[167953]	11/1/2003[3/11/2022]	Supporting calculations of activities kept
SILO 1	106.146[175559]	9/4/2000[4/14/2024]	Supporting calculations of activities kept
SILO 2	106.146[175559]	9/4/2000[4/14/2024]	Supporting calculations of activities kept

Permit By Rule Supplemental Table (Page 5)
Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
11/18/2024	O-3343	RN102905064

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
MIXING	106.146[175559]	9/4/2000[4/14/2024]	Supporting calculations of activities kept
EMGEN	106.511	9/4/2000	Records of hours of operations and supporting calculations
TANK 1	106.473	9/4/2000	Records of deliveries and supporting calculations
TANK 2	106.472	9/4/2000	Records of deliveries and supporting calculations
TANK 3	106.473	9/4/2000	Records of deliveries and supporting calculations
TANK 4	106.472	9/4/2000	Records of deliveries and supporting calculations
TANK 5	106.472	9/4/2000	Records of deliveries and supporting calculations
MIX	106.141	3/7/2013	Supporting calculations of activities kept
WELD	106.227	9/4/2000	Supporting calculations of activities kept
SSM	106.263	11/1/2001	Records of MSS actions and supporting calculations

Permit By Rule Supplemental Table (Page 6)
Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
11/18/2024	O-3343	RN102905064

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
GRIND	106.265	9/4/2000	Supporting calculations of activities kept
RESIN	106.392	9/4/2000	Records of resins and acetone, and supporting calculations of activities kept
REFUEL	106.412	9/4/2000	Supporting calculations of activities kept
DEGREASER	106.454	9/4/2000	Records of solvent usage and supporting calculations of activities kept

3. PROCESS DESCRIPTION

KOS is a fabricator of large structural steel components for subsea, drill rig, and onshore facilities for the oil and gas industry, as well as the nuclear fabrication markets. With access to the Gulf of Mexico through the La Quinta and Corpus Christi ship channels, the Ingleside Facility is designed specifically for deepwater projects. KOS builds a full range of offshore facilities from small platforms, modules, suction piles and tendons to large deepwater projects. Major projects include construction of offshore oil and gas structures, in addition to massive and complex steel construction and erection. KOS also fabricates structural steel components for bridges, girders, tubs, and foundations.

Facility operations consist of the receipt, storage, and distribution throughout the yard of structural steel components. These components include, but are not limited to, plate, tubular, and beam steel. The components are prepared by cutting, rolling, grinding, welding, blasting, priming, coating, applying thermal spray, and assembling.

The Ingleside Facility receives raw materials at its warehouse. The materials are primarily structural steel, components, coatings, thinners, welding supplies, thermal spray materials, and caulks, as well as incidental materials used in operations. The materials are disbursed from the warehouse on an "as needed" basis to the various project locations. Steel is worked into the appropriate shape via cutting, bending, rolling, grinding (to name a few), which will then be transferred throughout the yard for blasting, welding, coating, or thermal spray application. Bulk blast media receipt and distribution is controlled by the warehouse, but receipt and distribution occur at several fixed storage tanks.

Below are general descriptions of the various fabrication operations at the Ingleside Facility. Figures 3-1 and 3-2 provide general process flow diagrams for the site's operations.

3.1 Blasting Operations

Steel and other parts are distributed throughout the facility to prepare for blasting and coating. The parts are initially blasted to remove residual scale. The parts are then wiped with a solvent to remove residual organic materials prior to the application of surface coatings. The most common blasted steel components are structural and piping such as w-beams, c-channel, plate, angle iron, piping, and square tubing. The bulk blast media is received in bulk storage hoppers and transferred into smaller blast pots that are then used in the blasting operations (EPNs BLSTRCV and BLSTPOT). On completion of blasting operations, used blast media is collected, transported, and stored in a pile (EPN BLSTCLNFUG). This pile will be sprinkled with water as a dust suppression management practice. Dust collectors are used to control particulate matter emissions. Blasting is performed outside in the yard in 11 zones (EPN BLSTOPFUG) or within the paint building in the paint booths described in further detail below.

3.2 Organic and Inorganic Coating of Metal Parts

Coatings are received in buckets and pails and may consist of single or multiple component mixtures. The coatings are mixed with thinners or reducers according to manufacturer's specifications to the proper viscosity to allow the coat into be sprayed. The coatings are applied using airless or air-assisted airless paint application equipment or other equipment that has demonstrated to reach the same or higher transfer efficiency. The most common coated steel components are structural and piping such as w-beams, c-channel, plate, angle iron, piping, and square tubing. Coating application occurs outside in the yard in 11 zones (EPN COATOPFUG) or in the paint booths which are described in further detail below.

3.3 Thermal Spray Application

Similar to the blasting and coating operation, the thermal spray application (TSA) begins with blasting operations. After blasting, the parts are wiped with a solvent to remove residual organics. The parts are then coated via a thermal spray application of molten aluminum wire (TSAOPFUG). The TSA Booth (EPN TSABTH) was installed, but it is not operated due to low demand for this type of coating. Thermal spraying activities inside the TSA/blast booth will start as soon as a project/client require components to be covered with a metalized coating. Currently, the booth runs in "Blast mode" and it is operational to switch to "TSA Mode" as soon as TSA projects become available. Outdoor thermal spray application is authorized under EPN TSAOPFUG.

3.4 Paint Booths

There are four (4) booths [one Panel Booth (Large Booth) [EPNs PANEL1-6], two Paint Booths (or Small Booths) [EPNs PAINTBTH1-2], and a TSA Booth (EPN TSABTH)] used to perform blasting and painting in a humidity controlled environment with fabric filter controls. The large booth has three (3) heaters and each of the small and TSA booths have one (1) heater. There are a total of six (6) heaters for the paint booths, and all are natural gas fired. The burners have air handling units, and the products of combustion will be co-mingled with the air in the booths.

3.5 Fireproofing Application

Fireproofing materials will be received in buckets and pails and will be applied using a two component heated plural airless spray equipment. Steel structures will be isolated from weather conditions. This enclosure provides protection to finished components to protect them from any fireproofing material splashes. Fireproofing usage limitation was removed during the signed permit alteration dated December 16, 2016 granted by the Commission's Air Permits Division based on recent understanding of the physical and chemical characteristics of the fireproofing material.

3.6 Aerosol Spray Painting and Aerosol Can Crushing:

Aerosol cans to spray paint for marking of equipment and on the ground are used throughout the facility. This surface coating activity is currently authorized under PBR 106.433 (PBR Registration No. 109413). Aerosol can puncturing stations are located on-site for spray paint and lubricant cans. Emissions from the paint can crushing and aerosol can puncturing is authorized under PBRs 106.261/106.262 (PBR Registration No. 105659). Emissions from these sources are included in the site-wide toxics modeling evaluation included as part of this NSR amendment application.

3.7 Equipment Cleanup

The coating application equipment is cleaned daily when the surface coating application is complete. The application equipment is cleaned by circulating a solvent through the equipment and capturing it in a container or applying the residual to another part. The spray gun tips are removed and soaked in a covered container of solvent. All waste coatings and solvents captured are stored, disposed of, or recycled in accordance with applicable rules. Equipment cleanup will be conducted outdoors in authorized coating zones and inside the paint building near operation areas.

3.8 Solvent Distillation Units

The facility recovers used solvent for distillation and re-use. The used solvents are collected in 55-gallon drums and moved to the paint still location for temporary storage. Two batch distillation units are used to recover solvent from equipment cleanup (EPNs PNTSTILL and FUGSTILL). The electric-fired units can recover up to 20 gallons combined. A solvent tank with a nominal capacity of 980 gallons will be used to store fresh solvent used to clean coating application equipment (EPN SLVTK). The contents of the drums are then pumped to the still. Recycled solvent is collected in drums for re-use throughout the facility. Residual sludge from the still units is shipped in closed drums is disposed of in accordance with applicable rules.

3.9 Miscellaneous Operations – Sawing, Grinding, Cutting, Rolling, Drilling, and Welding Operations

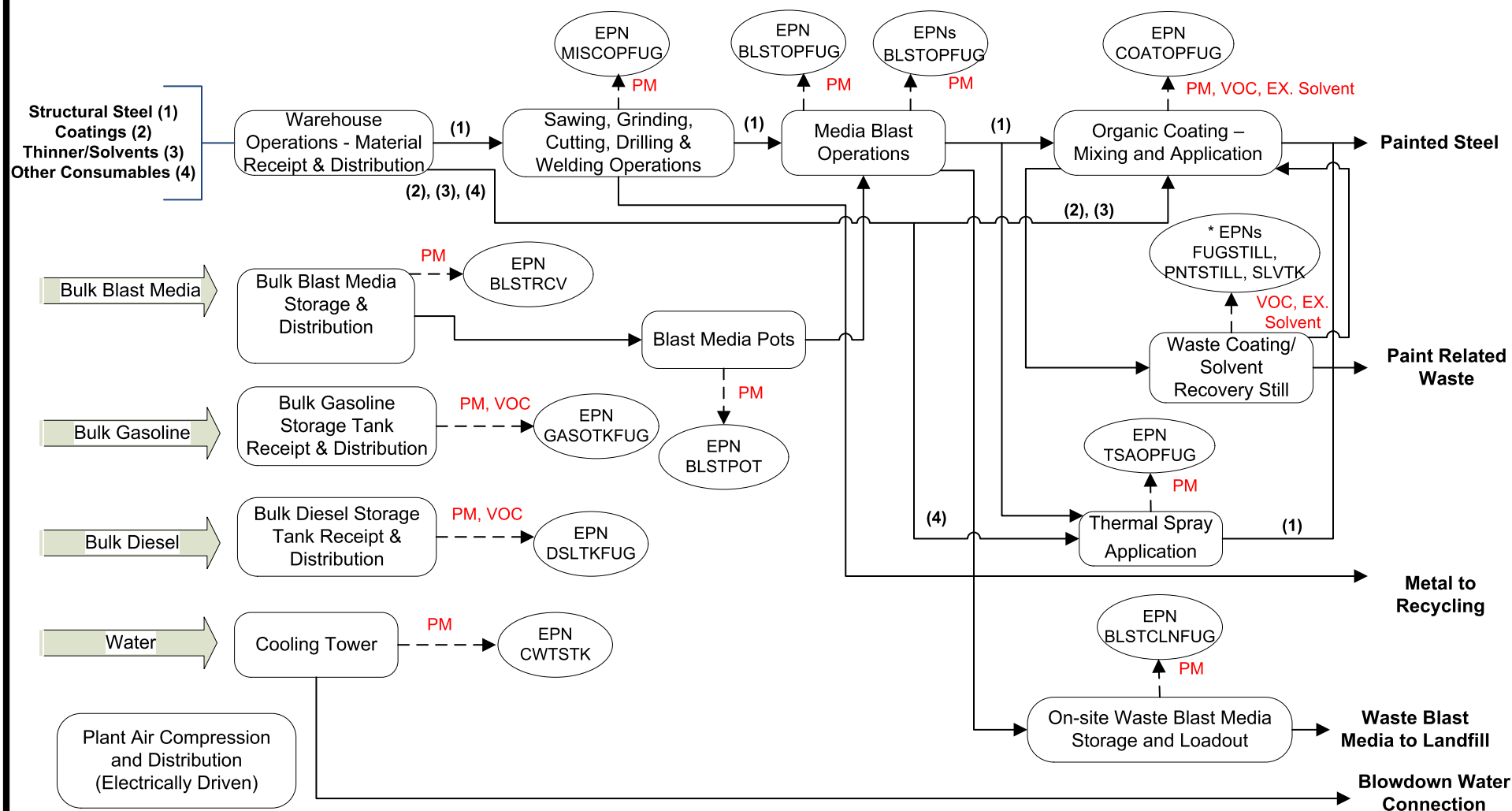
KOS receives structural steel angles, channel plates, I-beams, and other metal for fabrication into various shapes and structures. Automated fabrication equipment, used to shape the steel components includes:

- ▶ CNC plate-cutting facility (plasma or oxy/fuel gas);
- ▶ CNC beam-cutting/coping facility;
- ▶ CNC tubular coping machine; and
- ▶ Large-capacity plate-bending (rolling) machine.

Steel is transferred using forklifts to the cutting stations in the fabrication building. In the cutting area, the steel is cut to proper dimension using saws, cutting torches, and handheld grinders [30 TAC § 106.265 (Hand-Held and Manually Operated Machines)]. The plasma cutting table is authorized under PBRs 106.261/262 by contaminant. Once the parts are cut to size, they are clamped and welded together [30 TAC § 106.227 (Soldering, Brazing, Welding)].

Planned Maintenance, Startup, and Shutdown (MSS) activities that occur at the facility are authorized under PBR 106.263. Other miscellaneous activities, such as diesel and gasoline tanks with refueling activities, are authorized under PBR.

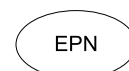
Figure 4-1. Process Flow Diagram – Outdoor Surface Coating and Abrasive Blasting Operations



Key



Process / Operation



Contaminant

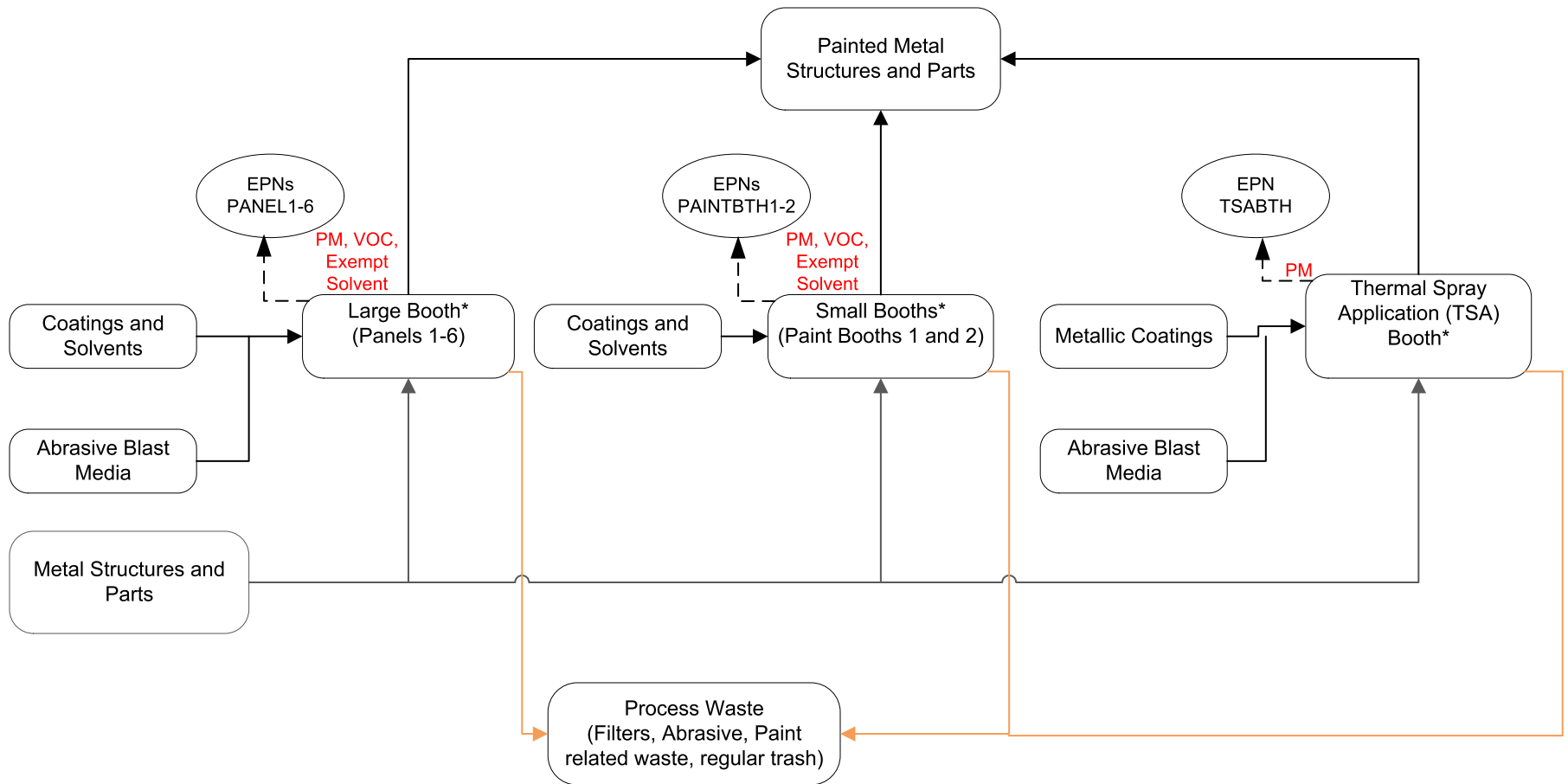
Air Emissions

Kiewit Offshore Services, Ltd.
January 2023
224403.0042

Outdoor Surface Coating and
Abrasive Blasting Operations
Process Flow Diagram

Trinity
Consultants

Figure 4-2. Process Flow Diagram – Enclosed Paint Operations



Key



Waste



Process / Operation



Contaminant

Air Emissions

Kiewit Offshore Services, Ltd.
January 2023
224403.0042

Enclosed Paint Operations
Process Flow Diagram

Trinity
Consultants

4. APPLICABLE REQUIREMENTS SUMMARY FORMS

This section contains the following forms and information:

- ▶ OP-REQ1 – Application Area-Wide Applicability Determinations and General Information
- ▶ OP-REQ3 – Applicable Requirements Summary

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

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 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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 6	
III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)	
D. Loading and Unloading of VOCs (continued)	
◆ 3. Transfer operations at motor vehicle fuel dispensing facilities are the only VOC transfer operations conducted in the application area.	<input checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" type="checkbox"/> NO
◆ 6. Stationary gasoline storage containers with a nominal capacity greater than 1,000 gallons are located at the facility.	<input checked="" 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 checked="" type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 8	
III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)	
F. Control of VOC Leaks from Transport Vessels (Complete this section for GOP applications for GOPs 511, 512, 513 and 514 only) (continued)	
◆ 2. Tank-truck tanks are filled with non-gasoline VOCs having a TVP greater than or equal to 0.5 psia under actual storage conditions at a facility subject to 30 TAC § 115.214(a)(1)(C) within the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input 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 checked="" 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 checked="" 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 checked="" type="checkbox"/> NO
◆ 4. The application area includes only facilities that have a monthly throughput of less than 10,000 gallons of gasoline.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 5. The decommissioning of all Stage II vapor recovery control equipment located in the application area has been completed and the decommissioning notice submitted.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 13	
IV. Title 30 TAC Chapter 117 - Control of Air Pollution from Nitrogen Compounds	
A. Applicability	
◆ 1. The application area is located in the Houston/Galveston/Brazoria, Beaumont/Port Arthur, or Dallas/Fort Worth Eight-Hour area. <i>For SOP applications, if the response to Question IV.A.1 is "YES," complete Sections IV.B - IV.F and IV.H.</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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 14		
IV. Title 30 TAC Chapter 117 - Control of Air Pollution from Nitrogen Compounds (continued)		
C. Commercial, Institutional, and Industrial Sources in Ozone Nonattainment Areas		
◆	<div>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.</div> <div><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></div>	<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		
◆	<div>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).</div> <div><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></div>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	2. The application area is located in the Houston/Galveston/Brazoria area and has units that qualify for an exemption under 30 TAC § 117.2003(a).	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	3. The application area is located in the Houston/Galveston/Brazoria area and has units that qualify for an exemption under 30 TAC § 117.2003(b).	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 16	
V. Title 40 Code of Federal Regulations Part 59 (40 CFR Part 59) - National Volatile Organic Compound Emission Standards for Consumer and Commercial Products	
A. Subpart B - National Volatile Organic Compound Emission Standards for Automobile Refinish Coatings	
1. The application area manufactures automobile refinishing coatings or coating components and sells or distributes these coatings or coating components in the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area imports automobile refinishing coatings or coating components, manufactured on or after January 11, 1999, and sells or distributes these coatings or coating components in the United States. <i>If the responses to Questions V.A.1 and V.A.2 are both "NO," go to Section V.B.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. All automobile refinishing coatings or coating components manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR § 59.100(c)(1) - (6).	<input type="checkbox"/> YES <input type="checkbox"/> NO
B. Subpart C - National Volatile Organic Compound Emission Standards for Consumer Products	
1. The application area manufactures consumer products for sale or distribution in the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area imports consumer products manufactured on or after December 10, 1998 and sells or distributes these consumer products in the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area is a distributor of consumer products whose name appears on the label of one or more of the products. <i>If the responses to Questions V.B.1 - V.B.3 are all "NO," go to Section V.C.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
4. All consumer products manufactured, imported, or distributed by the application area meet one or more of the exemptions specified in 40 CFR § 59.201(c)(1) - (7).	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 18	
VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)	
B. Subpart Y - Standards of Performance for Coal Preparation and Processing Plants	
1. The application area is located at a coal preparation and processing plant. <i>If the response to Question VI.B.1 is "NO," go to Section VI.C.</i>	<input type="checkbox"/> YES <input 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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 19	
VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)	
C. Subpart GG - Standards of Performance for Stationary Gas Turbines (GOP applicants only) (continued)	
◆	<div style="display: flex; justify-content: space-between;"> <div style="width: 80%;"> <p>5. One or more stationary gas turbines subject to 40 CFR Part 60, Subpart GG in the application area is injected with water or steam for the control of nitrogen oxides.</p> </div> <div style="width: 15%;"> <input type="checkbox"/> YES <input type="checkbox"/> NO </div> </div>
D. Subpart XX - Standards of Performance for Bulk Gasoline Terminals	
	<div style="display: flex; justify-content: space-between;"> <div style="width: 80%;"> <p>1. The application area includes bulk gasoline terminal loading racks. <i>If the response to Question VI.D.1 is "NO," go to Section VI.E.</i></p> </div> <div style="width: 15%;"> <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A </div> </div>
	<div style="display: flex; justify-content: space-between;"> <div style="width: 80%;"> <p>2. One or more of the loading racks were constructed or modified after December 17, 1980, and are not subject to 40 CFR Part 63, Subpart CC.</p> </div> <div style="width: 15%;"> <input type="checkbox"/> YES <input type="checkbox"/> NO </div> </div>
E. Subpart LLL - Standards of Performance for Onshore Natural Gas Processing: Sulfur Dioxide (SO₂) Emissions	
◆	<div style="display: flex; justify-content: space-between;"> <div style="width: 80%;"> <p>1. The application area includes affected facilities identified in 40 CFR § 60.640(a) that process natural gas (onshore). <i>For SOP applications, if the response to Question VI.E.1 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.1 is "NO" or "N/A," go to Section VI.H.</i></p> </div> <div style="width: 15%;"> <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO </div> </div>
◆	<div style="display: flex; justify-content: space-between;"> <div style="width: 80%;"> <p>2. The affected facilities commenced construction or modification after January 20, 1984 and on or before August 23, 2011. <i>For SOP applications, if the response to Question VI.E.2 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.2 is "NO," go to Section VI.H.</i></p> </div> <div style="width: 15%;"> <input type="checkbox"/> YES <input type="checkbox"/> NO </div> </div>
◆	<div style="display: flex; justify-content: space-between;"> <div style="width: 80%;"> <p>3. The application area includes a gas sweetening unit with a design capacity greater than or equal to 2 long tons per day (LTPD) of hydrogen sulfide but operates at less than 2 LTPD. <i>For SOP applications, if the response to Question VI.E.3 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.3 is "NO," go to Section VI.H.</i></p> </div> <div style="width: 15%;"> <input type="checkbox"/> YES <input type="checkbox"/> NO </div> </div>

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 20		
VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)		
E. Subpart LLL - Standards of Performance for Onshore Natural Gas Processing: Sulfur Dioxide (SO₂) Emissions (continued)		
◆	<p>4. Federally enforceable operating limits have been established in the preconstruction authorization limiting the gas sweetening unit to less than 2 LTPD.</p> <p><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></p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	<p>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.</p>	
F. Subpart OOO - Standards of Performance for Nonmetallic Mineral Processing Plants		
	<p>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.</p> <p><i>If the response to Question VI.F.1 is "NO," go to Section VI.G.</i></p>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	<p>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.</p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
G. Subpart QQQ - Standards of Performance for VOC Emissions from Petroleum Refinery Wastewater Systems		
	<p>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.</p> <p><i>If the response to Question VI.G.1 is "NO," go to Section VI.H.</i></p>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	<p>2. The application area includes storm water sewer systems.</p>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

Federal Operating Permit Program

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 23		
VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)		
I. Subpart CCCC - Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction Commenced After November 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 1, 2001 (continued)		
◆	3. The application area includes at least one commercial or industrial solid waste incineration unit, other than an air curtain incinerator, constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	4. The application area includes at least one air curtain incinerator. <i>If the response to Question VI.I.4 is "NO," go to Section VI.J.</i>	<input type="checkbox"/> YES <input 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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 24	
VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)	
J. Subpart EEEE - Standards of Performance for Other Solid Waste Incineration Units for Which Construction Commenced After December 9, 2004 or for Which Modification or Reconstruction Commenced on or After June 16, 2006	
◆	<div style="display: flex; justify-content: space-between;"> <div style="width: 75%;"> <p>1. The application area includes at least one very small municipal waste incineration unit or institutional incineration unit, other than an air curtain incinerator.</p> <p><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></p> </div> <div style="width: 20%;"> <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A </div> </div>
◆	<div style="display: flex; justify-content: space-between;"> <div style="width: 75%;"> <p>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.</p> </div> <div style="width: 20%;"> <input type="checkbox"/> YES <input type="checkbox"/> NO </div> </div>
◆	<div style="display: flex; justify-content: space-between;"> <div style="width: 75%;"> <p>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.</p> </div> <div style="width: 20%;"> <input type="checkbox"/> YES <input type="checkbox"/> NO </div> </div>
◆	<div style="display: flex; justify-content: space-between;"> <div style="width: 75%;"> <p>4. The application area includes at least one air curtain incinerator.</p> <p><i>If the response to Question VI.J.4 is "NO," go to Section VI.K.</i></p> </div> <div style="width: 20%;"> <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO </div> </div>
◆	<div style="display: flex; justify-content: space-between;"> <div style="width: 75%;"> <p>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.</p> <p><i>If the response to Question VI.J.5 is "NO," go to Question VI.J.7.</i></p> </div> <div style="width: 20%;"> <input type="checkbox"/> YES <input type="checkbox"/> NO </div> </div>
◆	<div style="display: flex; justify-content: space-between;"> <div style="width: 75%;"> <p>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.</p> </div> <div style="width: 20%;"> <input type="checkbox"/> YES <input type="checkbox"/> NO </div> </div>
◆	<div style="display: flex; justify-content: space-between;"> <div style="width: 75%;"> <p>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.</p> </div> <div style="width: 20%;"> <input type="checkbox"/> YES <input type="checkbox"/> NO </div> </div>

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 25	
VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (NSPS) (continued)	
J. Subpart EEEE - Standards of Performance for Other Solid Waste Incineration Units for Which Construction Commenced After December 9, 2004 or for Which Modification or Reconstruction Commenced on or After June 16, 2006 (continued)	
◆ 8. All air curtain incinerators constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 9. The air curtain incinerator is located at an institutional facility and is a distinct operating unit of the institutional facility that generated the waste.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 10. The air curtain incinerator burns less than 35 tons per day of wood waste, clean lumber, or yard waste or a mixture of these materials.	<input type="checkbox"/> YES <input type="checkbox"/> NO
K. Subpart OOOO - Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution	
◆ 1. The application area includes one or more of the onshore affected facilities listed in 40 CFR § 60.5365(a)-(g) that are subject to 40 CFR Part 60, Subpart OOOO.	<input type="checkbox"/> YES <input 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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 26	
VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)	
D. Subpart L - National Emission Standard for Benzene Emissions from Coke By-Product Recovery Plants	
1. The application area is located at a coke by-product recovery plant and includes one or more of the affected sources identified in 40 CFR § 61.130(a) - (b). <i>If the response to Question VII.D.1 is "NO," go to Section VII.E.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area includes equipment in benzene service as determined by 40 CFR § 61.137(b).	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area has elected to comply with the provisions of 40 CFR § 61.243-1 and 40 CFR § 61.243-2.	<input type="checkbox"/> YES <input type="checkbox"/> NO
E. Subpart M - National Emission Standard for Asbestos	
<i>Applicability</i>	
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
<i>Roadway Construction</i>	
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
<i>Manufacturing Commercial Asbestos</i>	
3. The application area includes a manufacturing operation using commercial asbestos. <i>If the response to Question VII.E.3 is "NO," go to Question VII.E.4.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
a. Visible emissions are discharged to outside air from the manufacturing operation	<input type="checkbox"/> YES <input type="checkbox"/> NO
b. An alternative emission control and waste treatment method is being used that has received prior U.S. Environmental Protection Agency (EPA) approval.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 27	
VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)	
E. Subpart M - National Emission Standard for Asbestos (continued)	
<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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 28	
VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)	
E. Subpart M - National Emission Standard for Asbestos (continued)	
<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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 29	
VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)	
E. Subpart M - National Emission Standard for Asbestos (continued)	
<i>Fabricating Commercial Asbestos (continued)</i>	
f. A HEPA filter is being used that is certified to be at least 99.97% efficient for 0.3 micron particles.	<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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 33	
VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)	
H. Subpart FF - National Emission Standard for Benzene Waste Operations (continued)	
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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 34	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
B. Subpart F - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry (continued)	
<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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 35		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater		
<i>Applicability</i>		
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
<i>Vapor Collection and Closed Vent Systems</i>		
6.	Flow indicators are installed, calibrated, maintained, and operated at the entrances to bypass lines in the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7.	Bypass lines in the application area are secured in the closed position with a car-seal or a lock-and-key type configuration.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 36	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)	
<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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 37	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)	
<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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 38	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)	
Process Wastewater Streams (continued)	
24. All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.C.24 is "YES," go to Question VIII.C.34.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
25. The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.C.25 is "NO," go to Question VIII.C.27.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
26. The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	<input type="checkbox"/> YES <input type="checkbox"/> NO
27. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	<input type="checkbox"/> YES <input type="checkbox"/> NO
28. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.C.27 - VIII.C.28 are both "NO," go to Question VIII.C.30.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
29. The application area includes waste management units that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	<input type="checkbox"/> YES <input type="checkbox"/> NO
30. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 39	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)	
<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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 40	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
C. Subpart G-National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operation, and Wastewater (continued)	
Drains (continued)	
37. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds listed in 40 CFR Part 63 Subpart G, Table 9, at an annual average flow rate greater than or equal to 10 liters per minute.	<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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 41	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
E. Subpart O - Ethylene Oxide Emissions Standards for Sterilization Facilities	
1. The application area includes sterilization facilities where ethylene oxide is used in the sterilization or fumigation of materials. <i>If the response to Question VIII.E.1 is "NO," go to Section VIII.F.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. Sterilization facilities located in the application area are subject to 40 CFR Part 63, Subpart O. <i>If the response to Question VIII.E.2 is "NO," go to Section VIII.F.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The sterilization source has used less than 1 ton (907 kg) of ethylene oxide within all consecutive 12-month periods after December 6, 1996.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The sterilization source has used less than 10 tons (9070 kg) of ethylene oxide within all consecutive 12-month periods after December 6, 1996.	<input type="checkbox"/> YES <input type="checkbox"/> NO
F. Subpart Q - National Emission Standards for Industrial Process Cooling Towers	
1. The application area includes industrial process cooling towers. <i>If the response to Question VIII.F.1 is "NO," go to Section VIII.G.</i>	<input 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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 42	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
G. Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) (continued)	
<p>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.</p> <p><i>If the response to Question VIII.G.4 is "YES," go to Question VIII.G.10.</i></p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<p>5. An emissions screening factor was calculated for the bulk gasoline terminal or pipeline breakout station.</p> <p><i>If the response to Question VIII.G.5 is "NO," go to Question VIII.G.10.</i></p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<p>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).</p> <p><i>If the response to Question VIII.G.6 is "NO," go to Question VIII.G.10.</i></p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<p>7. Emissions screening factor less than 0.5 (ET or EP < 0.5).</p> <p><i>If the response to Question VIII.G.7 is "YES," go to Section VIII.H.</i></p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<p>8. Emissions screening factor greater than or equal to 0.5, but less than 1.0 (0.5 ≤ ET or EP < 1.0).</p> <p><i>If the response to Question VIII.G.8 is "YES," go to Section VIII.H.</i></p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<p>9. Emissions screening factor greater than or equal to 1.0 (ET or EP ≥ 1.0).</p> <p><i>If the response to Question VIII.G.9 is "YES," go to Question VIII.G.11.</i></p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<p>10. The site at which the application area is located is a major source of HAP.</p> <p><i>If the response to Question VIII.G.10 is "NO," go to Section VIII.H.</i></p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<p>11. The application area is using an alternative leak monitoring program as described in 40 CFR § 63.424(f).</p>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 43	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
H. Subpart S - National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry	
1. The application area includes processes that produce pulp, paper, or paperboard and are located at a plant site that is a major source of HAPs as defined in 40 CFR § 63.2. <i>If the response to Question VIII.H.1 is "NO," go to Section VIII.I.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area uses processes and materials specified in 40 CFR § 63.440(a)(1) - (3). <i>If the response to Question VIII.H.2 is "NO," go to Section VIII.I.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes one or more sources subject to 40 CFR Part 63, Subpart S that are existing sources. <i>If the response to Question VIII.H.3 is "NO," go to Section VIII.I.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes one or more kraft pulping systems that are existing sources.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes one or more dissolving-grade bleaching systems that are existing sources at a kraft or sulfite pulping mill.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes bleaching systems that are existing sources and are complying with the Voluntary Advanced Technology Incentives Program for Effluent Limitation Guidelines in 40 CFR § 430.24. <i>If the response to Question VIII.H.6 is "NO," go to Section VIII.I.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes bleaching systems that are complying with 40 CFR § 63.440(d)(3)(i).	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. The application area includes bleaching systems that are complying with 40 CFR § 63.440(d)(3)(ii).	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 46	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins (continued)	
Containers	
11. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Drains	
12. The application area includes individual drain systems that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. <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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 50	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
N. Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries (continued)	
Applicability (continued)	
9. The application area includes Group 1 or Group 2 wastewater streams that are complying with 40 CFR § 63.640(o)(2)(ii). <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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 54		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
Q. Subpart - HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities (continued)		
◆	<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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 56	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
U. Subpart PP - National Emission Standards for Containers (continued)	
4. The application area includes containers using Container Level 3 controls.	<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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 59	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)	
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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 66	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
X. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins (continued)	
13. The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Containers	
14. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Drains	
15. The application area includes individual drain systems that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. <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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 75	
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
EE. Subpart 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.	
Subpart MMMM	

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

Federal Operating Permit Program

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 78	
XI. Miscellaneous (continued)	
B. Forms	
<p>◆ 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></p>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
<p>◆ 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.</p> <p style="text-align: center;">Subpart MMMM</p>	
C. Emission Limitation Certifications	
<p>◆ 1. The application area includes units for which federally enforceable emission limitations have been established by certification.</p>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
D. Alternative Means of Control, Alternative Emission Limitation or Standard, or Equivalent Requirements	
<p>1. The application area is located at a site that is subject to a site-specific requirement of the state implementation plan (SIP).</p>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<p>2. The application area includes units located at the site that are subject to a site-specific requirement of the SIP.</p>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<p>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></p>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<p>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></p>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 80	
XI. Miscellaneous (continued)	
G. 40 CFR Part 97, Subpart FFFFF - Texas SO₂ Trading Program	
1. The application area includes emission units complying with the requirements of the Texas SO ₂ Trading Program. <i>If the response to Question XI.G.1 is "NO," go to Question XI.G.6.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart B for SO ₂ and 40 CFR Part 75, Subpart H for heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes gas or oil-fired units that are complying with the monitoring requirements of 40 CFR Part 75, Appendix D for SO ₂ and heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes gas or oil-fired units that are complying with the Low Mass Emissions monitoring requirements of 40 CFR § 75.19 for SO ₂ and heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes units that are complying with EPA-approved alternative monitoring system requirements of 40 CFR Part 75, Subpart E for SO ₂ and heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes emission units that qualify for the Texas SO ₂ Trading Program retired unit exemption.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
H. Permit Shield (SOP Applicants Only)	
1. A permit shield for negative applicability entries on Form OP-REQ2 (Negative Applicable Requirement Determinations) is being requested or already exists in the permit.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 83	
XI. Miscellaneous (continued)	
L. Compliance Assurance Monitoring	
◆ 1.	<p>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.</p> <p><i>If the response to Question XI.L.1 is "NO," go to Section XI.M.</i></p>
	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆ 2.	<p>The unit or units defined by XI.L.1 are using a control device to comply with an applicable requirement.</p> <p><i>If the response to Question XI.L.2 is "NO," go to Section XI.M.</i></p>
	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 3.	<p>The permit holder has submitted a CAM proposal on Form OP-MON in a previous application.</p>
	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 4.	<p>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.</p> <p><i>If the responses to Questions XI.L.3 and XI.L.4 are both "NO," go to Section XI.M.</i></p>
	<input type="checkbox"/> YES <input type="checkbox"/> NO
5.	<p>The owner/operator or permit holder is submitting a CAM implementation plan and schedule to be incorporated as enforceable conditions in the permit.</p>
	<input type="checkbox"/> YES <input type="checkbox"/> NO
6.	<p>Provide the unit identification numbers for the units for which the applicant is submitting a CAM implementation plan and schedule in the space below.</p>
◆ 7.	<p>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).</p>
	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 8.	<p>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).</p> <p><i>If the response to Question XI.L.8 is "YES," go to Section XI.M.</i></p>
	<input type="checkbox"/> YES <input type="checkbox"/> NO

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 85		
XII. New Source Review (NSR) Authorizations (continued)		
B. Air Quality Standard Permits		
◆	1. The application area includes at least one Air Quality Standard Permit NSR authorization. <i>If the response to XII.B.1 is "NO," go to Section XII.C. If the response to XII.B.1 is "YES," be sure to include the standard permit's registration numbers in Section XII.H and answer XII.B.2 - B.16 as appropriate.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	2. The application area includes at least one "State Pollution Control Project" Air Quality Standard Permit NSR authorization under 30 TAC § 116.617.	<input type="checkbox"/> YES <input 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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 86		
XII. New Source Review (NSR) Authorizations (continued)		
B. Air Quality Standard Permits (continued)		
◆	11. The application area includes at least one "Rock Crusher" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> YES <input 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

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 87			
XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)			
E. PSD Permits and PSD Major Pollutants			
PSD Permit No.:	Issuance Date:	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
If PSD Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html .			
F. Nonattainment (NA) Permits and NA Major Pollutants			
NA Permit No.:	Issuance Date:	Pollutant(s):	
NA Permit No.:	Issuance Date:	Pollutant(s):	
NA Permit No.:	Issuance Date:	Pollutant(s):	
NA Permit No.:	Issuance Date:	Pollutant(s):	
If NA Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html .			
G. NSR Authorizations with FCAA § 112(g) Requirements			
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
◆ H. Title 30 TAC Chapter 116 Permits, Special Permits, Standard Permits, Other Authorizations (Other Than Permits By Rule, PSD Permits, NA Permits) for the Application Area			
Authorization No.: 47227	Issuance Date: 1/24/2024	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:

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

Date:	11/18/2024
Permit No.:	O-3343
RN No.:	RN102905064

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.: 106.141	Version No./Date: 3/7/2013
PBR No.: 106.146	Version No./Date: 9/4/2000
PBR No.: 106.227	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
PBR No.: 106.263	Version No./Date: 11/1/2001
PBR No.: 106.264	Version No./Date: 9/4/2000
PBR No.: 106.265	Version No./Date: 9/4/2000
PBR No.: 106.392	Version No./Date: 9/4/2000
PBR No.: 106.412	Version No./Date: 9/4/2000
PBR No.: 106.433	Version No./Date: 9/4/2000
PBR No.: 106.454	Version No./Date: 9/4/2000
PBR No.: 106.472	Version No./Date: 9/4/2000
PBR No.: 106.473	Version No./Date: 9/4/2000
PBR No.: 106.511	Version No./Date: 9/4/2000
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:

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

Table 1a: Additions

Date: 11/18/2024	Regulated Entity No.: RN102905064	Permit No.: O-3343
Company Name: Kiewit Offshore Services, Ltd.	Area Name: Ingleside Offshore Platform Fabrication Facilities	

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)
9	GRP-PAINT	OP-REQ3	63MMMM -0001	HAPS	40 CFR Part 63, Subpart MMMM	§63.3890(a) §63.3891(b) §63.3892(a) §63.3893(a) §63.3900(a)(1) §63.3900(b)

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

Table 1b: Additions

Date: 11/18/2024	Regulated Entity No.: RN102905064	Permit No.: O-3343
Company Name: Kiewit Offshore Services, Ltd.	Area Name: Ingleside Offshore Platform Fabrication Facilities	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
9	GRP-PAINT	63MMMM-0001	HAPS	None	§63.3930(c)(1) §63.3930(c)(3) §63.3952	None

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

Table 2a: Deletions

Date: 11/18/2024	Regulated Entity No.: RN102905064	Permit No.: O-3343
Company Name: Kiewit Offshore Services, Ltd.	Area Name: Ingleside Offshore Platform Fabrication Facilities	

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)
8	EMGEN	OP-REQ3	60IIII-0001	CO	40 CFR Part 60, Subpart IIII	None
8	EMGEN	OP-REQ3	60IIII-0001	NMHC and NO _x	40 CFR Part 60, Subpart IIII	None
8	EMGEN	OP-REQ3	60IIII-0001	PM	40 CFR Part 60, Subpart IIII	None
9	GRP-PAINT	OP-REQ3	63MMMM-0001	HAPS	40 CFR Part 63, Subpart MMMM	None

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

Table 2b: Deletions

Date: 11/18/2024	Regulated Entity No.: RN102905064	Permit No.: O-3343
Company Name: Kiewit Offshore Services, Ltd.	Area Name: Ingleside Offshore Platform Fabrication Facilities	

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
8	EMGEN	OP-REQ3	60IIII-0001	CO	None	None	[G]§60.4214(d)
8	EMGEN	OP-REQ3	60IIII-0001	NMHC and NO _x	None	None	[G]§60.4214(d)
8	EMGEN	OP-REQ3	60IIII-0001	PM	None	None	[G]§60.4214(d)
9	GRP-PAINT	OP-REQ3	63MMMM-0001	HAPS	§ 63.3960(a)(1) § 63.3960(a)(2) § 63.3960(a)(3) § 63.3960(a)(4) § 63.3964 § 63.3965(a) § 63.3966(a) § 63.3966(b) § 63.3966(c) § 63.3966(d) § 63.3966(e) § 63.3966(f) § 63.3967(a) § 63.3967(c) § 63.3968(a) § 63.3968(c)(1) § 63.3968(f)	§ 63.3930(c)(4)	§ 63.3920(b)