

Carolyn Thomas

From: TVAPPS
Sent: Thursday, March 13, 2025 3:39 PM
To: Carolyn Thomas
Cc: APIRT
Subject: FW: STEERS/TV 37811 / 1896 - STREAMLINE - HERITAGE THERMAL OF TEXAS

-----Original Message-----

From: steers@tceq.texas.gov <steers@tceq.texas.gov>
Sent: Thursday, March 13, 2025 12:07 PM
To: RFCAIR10 <RFCAIR10@tceq.texas.gov>; TVAPPS <tvapps@tceq.texas.gov>
Subject: STEERS Title V Application Submittal (New Application)

The TV-E application has been successfully submitted by TIMOTHY BYARS. The submittal was received at 03/13/2025 12:06 PM.

The Reference number for this submittal is 607177

The confirmation number for this submittal is 638891.

The Area ID for this submittal is 1896.

The Project ID for this submittal is 37811.

The hash code for this submittal is 77675D7B8100C6016FB92CF6FE26DF9A1774E60D639561E16920A94E130C9836.

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

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

STREAMLINED REVISION APPLICATION

Site Operating Permit 01896

**Heritage Thermal of Texas, LLC
Sabine Regional Incinerator
Orange, TX
CN605764703
RN111009247**

Prepared By:

TRINITY CONSULTANTS

9737 Great Hills Trail
Suite 340
Austin, TX 78759
512-693-4191

March 2025

Project 234404.0094



TABLE OF CONTENTS

1. PROJECT INFORMATION	1-1
2. ADMINISTRATIVE FORMS	2-1
3. UNIT ATTRIBUTE FORMS	3-2
4. APPLICABLE REQUIREMENTS SUMMARY FORMS	4-1

1. PROJECT INFORMATION

Heritage Thermal of Texas, LLC (Heritage) owns and operates the Sabine River Regional Incinerator (SRI) located in Orange County, near Orange, Texas. The SRI operates under Federal operating Permit No. O1896 and has been assigned TCEQ Regulated Entity Number (RN) 111009247. The purpose of this application is to revise the SOP.

1.1 Revisions to Permit

As part of this application, the following revisions are being requested:

- ▶ Establish Mr. Vincent Waggle as a DAR.
- ▶ Update the Technical Contact information for Mr. Vincent Waggle.
- ▶ Incorporate standard permit 174824 which authorizes replacement of the carbon adsorption system (CAS) that is used as a control device for tanks in GRP-TF30 and GRP-TF10.
- ▶ Update the Control Device ID for the new CAS from INC-CB01 to INC-TFCB to be consistent with the EPN used in the NSR permits.
- ▶ Replace the Unit ID INC-CB02 (Container Storage Carbon Bed) with INC-TFCB. The storage containers subject to 40 CFR Part 61, Subpart FF will be controlled by the new INC-TFCB instead of INC-CB02.
- ▶ Update the Unit ID INC-CB04 (Sample Bay Carbon Bed) to INC-SCB to be consistent with the EPN used in the NSR permits.
- ▶ The new CAS will be monitored for VOC breakthrough and the carbon will be replaced, as needed, based on this monitoring. The carbon in the original CAS was replaced at predetermined intervals. Therefore, several updates to the CAS monitoring provisions are needed in the TV permit. In addition, representations for the closed vent system that routes to the CAS are being updated. This includes the following:
 - Updates to the unit attributes and applicable requirements for GRP-TF10 under NESHAP FF (Index No. 61FF-GRP-TF102) and MACT DD (Index No. 63DD-GRP-TF101 and 63DD-GRP-TF103).
 - Updates to the unit attributes and applicable requirements for GRP-TF30 under NESHAP FF (Index No. 61FF-GRP-TF302) and MACT DD.
 - Update periodic monitoring for GRP-TF30 under NSPS Kb, Index No. 60Kb-GRP-TF307 and 60Kb-GRP-TF308
- ▶ Remove the 40 CFR Part 63, Subpart G requirements from the Title V permit. The Heritage Sabine Regional Incinerator site does not include a chemical manufacturing process unit subject to 40 CFR Part 63 Subparts F, G, and H. The Heritage site receives wastewater streams and/or residuals from other sites subject to subparts F, G, and H and manages the streams and/or residuals according to §63.132(g)(2).
- ▶ Incorporate the 9/18/2024 issuance of NSR permit 160845, which includes the following update to the Title V permit:
 - Remove INC-TRANS and INC-ADD since these activities are no longer performed at the site.

2. ADMINISTRATIVE FORMS

This section contains the following forms and information:

- ▶ OP-DEL – Delegation of Responsible Official Information
- ▶ OP-1 – Section VII of Site Information Summary
- ▶ OP-2 – Application for Permit Revision/Renewal
- ▶ OP-SUMR – Individual Unit Summary for Revisions

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

I. Identifying Information
Account Number: N/A
Regulated Entity Number: RN111009247
Customer Reference Number: CN605764703
Permit Number: O1896
Area Name: Sabine Regional Incinerator
Company Name: Heritage Thermal of Texas, LLC
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): Vincent Waggle
Title: Quality Control Manager
Delegation Effective Date: 1/1/2025
Telephone Number: 419-540-0241
Fax Number:
Company Name: Heritage Thermal Services, Inc.
Mailing Address: 1250 St. George Street
City: East Liverpool
State: OH
ZIP Code: 43920
Email Address: vwaggle@heritage-enviro.com

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

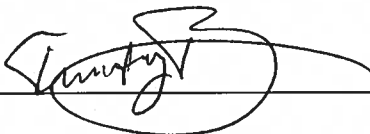
III. Certification of Truth, Accuracy, and Completeness

I, Timothy Byars

(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)*

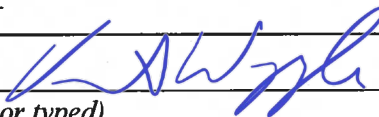
Responsible Official Signature: _____



Date: 03/06/25

Duly Authorized Representative Signature: Vincent Waggle

(Name(s) printed or typed)



Date: 3/6/2025

IV. Removal of Duly Authorized Representative(s)

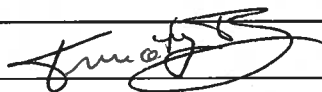
The following should be removed as Duly Authorized Representative(s):

Brenda Wilson, Jo Ann Gehrig, Dawn Hughes, Tommy Thompson, James Bass, Ferdinand Arriola, Troy Bearden, Michelle Jeffrey, Fran Falcon

(Name(s) printed or typed)

Effective Date: 1/1/2025

Responsible Official Signature: _____



Date: 03/06/25

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

VII. Technical Contact Identifying Information <i>(Complete if different from RO.)</i>
Technical Contact Name Prefix: (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Technical Contact Full Name: Vincent Waggle
Technical Contact Title: Quality Control Manager
Employer Name: Heritage Thermal of Texas Inc.
Mailing Address: PO Box 3861
City: Orange
State: TX
ZIP Code: 77631
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 419-540-0241
Fax No.:
Email: vwaggle@heritage-enviro.com
VIII. Reference Only Requirements <i>(For reference only.)</i>
A. State Senator:
B. State Representative:
C. Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? <input 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 type="checkbox"/> Yes <input type="checkbox"/> No
E. Indicate the alternate language(s) in which public notice is required:

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

Date:	3/11/2025														
Permit No.:	O1896														
Regulated Entity No.:	RN111009247														
Company Name:	Heritage Thermal of Texas, LLC														
For Submissions to EPA															
Has an electronic copy of this application been submitted (or is being submitted) to EPA?										X	YES		NO		
I. Application Type															
Indicate the type of application:															
	Renewal														
X	Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)														
	Significant Revision														
	Revision Requesting Prior Approval														
	Administrative Revision														
	Response to Reopening														
II. Qualification Statement															
For SOP Revisions Only										X	YES		NO		
For GOP Revisions Only											YES		NO		
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:															
<i>(Check the appropriate box[es].)</i>															
	VOC	X	NO _x		SO ₂		PM ₁₀	X	CO		Pb	X	HAPs		
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)?										X	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:	3/11/2025
Permit No.:	01896
Regulated Entity No.:	RN111009247
Company Name:	Heritage Thermal of Texas, LLC

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

Revision No.	Revision Code	Unit/Group/Process			NSR Authorization	Description of Change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
1	MS-C	NO	GRP-TF30	OP-UA3	160845, 174824	Remove MACT G requirements. Replace the periodic monitoring system under NSPS Kb, Index No. 60Kb-GRP-TF307 and 60Kb-GRP-TF308 as shown in the OP-MON. Update the unit attributes and applicable requirements under NESHAP FF (Index No. 61FF-GRP-TF302) and MACT DD. Update the CAS control device ID from INC-CB01 to INC-TFCB to match the EPN used in the NSR permits.
2	MS-C	NO	GRP-TF10	OP-UA3	160845, 174824	Remove MACT G requirements. Update the unit attributes and applicable requirements under NESHAP FF (Index No. 61FF-GRP-TF102) and MACT DD (Index No. 63DD-GRP-TF101 and 63DD-GRP-TF103). Update the CAS control device ID from INC-CB01 to INC-TFCB to match the EPN used in the NSR permits.
3	MS-C	NO	INC-CB02	OP-UA52	NA	Delete INC-CB02 from the Title V permit. The INC-TFCB is going to be used as a backup control for containers at the site. Therefore, replace INC-CB02 with INC-TFCB on OP-UA52.
4	MS-C	NO	INC-SCB (INC-CB04)	OP-UA52	NA	Update the Unit ID from INC-CB04 to INC-SCB to match the EPN used in the NSR permits.
5	MS-C	NO	INC-INCO1	OP-UA 52, OP-UA58	NA	Remove MACT G requirements.
6	MS-A	NO	Multiple	Multiple	160845	Incorporate the 9/18/2024 issuance of NSR 160845.
7	MS-C	NO	INC-TRANS, INC-ADD	OP-UA4, OP-UA15	160845	Remove these two Unit ID's from the TV permit since these activities are no longer performed at the site.

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.
3/11/2025	01896	RN111009247

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/30 TAC Chapter 106	Preconstruction Authorizations Title I
D	7	INC-ADD	OP-UA15	ADDITIVE ADDITION		160845	
	2	INC-TF01	OP-UA3	SOLVENT TANK		160845, 174824	
	2	INC-TF02	OP-UA3	WEST DECANT TANK		160845, 174824	
	2	INC-TF03	OP-UA3	EAST DECANT TANK		160845, 174824	
	2	INC-TF04	OP-UA3	RECEIVER TANK		160845, 174824	
	1	INC-TF05	OP-UA3	NO 1 SLUDGE TANK		160845, 174824	
	1	INC-TF06	OP-UA3	NO 1 SPILL TANK		160845, 174824	
	1	INC-TF07	OP-UA3	NO 2 SPILL TANK		160845, 174824	
	1	INC-TF08	OP-UA3	NO 2 ORGANIC TANK		160845, 174824	
	1	INC-TF09	OP-UA3	AQUEOUS TANK		160845, 174824	
	1	INC-TF10	OP-UA3	ACID TANK		160845, 174824	
	1	INC-TF11	OP-UA3	NO 1 ORGANIC TANK		160845, 174824	
	1	INC-TF12	OP-UA3	NO 2 SLUDGE TANK		160845, 174824	
	1	INC-TF13	OP-UA3	NO 3 SLUDGE TANK		160845, 174824	
D	3	INC-CB02	OP-UA52	CONTAINER STORAGE CARBON BED		160845	
	4	INC-SCB INC-CB04	OP-UA52	SAMPLE BAY CARBON BED		160845	
A	3	INC-TFCB	OP-UA52	TANK FARM CARBON BED		174824	
D	7	INC-TRANS	OP-UA4	CONTAINER TRANSLOADING		160845	

3. UNIT ATTRIBUTE FORMS

This section contains the following Unit Attribute Forms:

- ▶ OP-UA3 – Storage Tank Vessel Attributes
 - Table 3
 - Table 8
 - Table 12
 - Table 14
- ▶ OP-UA52 – System and Control Device Attributes
 - Table 1
 - Table 4
- ▶ OP-UA58 – Treatment Process Attributes
 - Table 3

Storage Tank/Vessel Attributes

Form OP-UA3 (Page 3)

Federal Operating Permit Program

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

Subpart Kb: Standards of Performance for Volatile Organic Liquid Storage Vessels

(Including Petroleum Liquid Storage Vessels)

Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
3/11/2025	01896	RN111009247

Unit ID No.	SOP/GOP Index No.	Product Stored	Storage Capacity	WW Tank Control	Maximum TVP	Storage Vessel Description	AMEL ID No.	Guidepole	Reid Vapor Pressure	Control Device ID No.
GRP-TF30	60Kb-GRP-TF301	WASTE	20K-40K	NONE	2.2-	CVS-CD				INC-INCO1
GRP-TF30	60Kb-GRP-TF302	WASTE	20K-40K	NONE	2.2-4.0	CVS-CD				INC-INCO1
GRP-TF30	60Kb-GRP-TF303	WASTE	20K-40K	NONE	4.0-11.1	CVS-CD				INC-INCO1
GRP-TF30	60Kb-GRP-TF304	WASTE	20K-40K	NONE	11.1+A	CVS-CD				INC-INCO1
GRP-TF30	60Kb-GRP-TF305	WASTE	20K-40K	NONE	2.2-	CVS-CD				INC-TFCB
GRP-TF30	60Kb-GRP-TF306	WASTE	20K-40K	NONE	2.2-4.0	CVS-CD				INC-TFCB
GRP-TF30	60Kb-GRP-TF307	WASTE	20K-40K	NONE	4.0-11.1	CVS-CD				INC-TFCB
GRP-TF30	60Kb-GRP-TF308	WASTE	20K-40K	NONE	11.1+A	CVS-CD				INC-TFCB

Storage Tank/Vessel Attributes

Form OP-UA3 (Page 9)

Federal Operating Permit Program

Table 8a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart DD: National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations

Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
3/11/2025	01896	RN111009247

Unit ID No.	SOP Index No.	Subject to Another Subpart of 40 CFR Part 61 or 63	HAP < 1 MG Per Year	Numerical Concentration Limits	Treated Organic Hazardous Constituents	Air Emission Controls	Direct Measurement	Biological Treatment	Efficiency ≥ 95%
GRP-TF10	63DD-GRP-TF101	NO	NO	NO	NO	YES		NO	
GRP-TF10	63DD-GRP-TF102	NO	NO	NO	NO	YES		NO	
GRP-TF10	63DD-GRP-TF103	NO	NO	NO	NO	YES		NO	
GRP-TF10	63DD-GRP-TF104	NO	NO	NO	NO	YES		NO	
GRP-TF30	63DD-GRP-TF301	NO	NO	NO	NO	YES		NO	
GRP-TF30	63DD-GRP-TF302	NO	NO	NO	NO	YES		NO	
GRP-TF30	63DD-GRP-TF303	NO	NO	NO	NO	YES		NO	
GRP-TF30	63DD-GRP-TF304	NO	NO	NO	NO	YES		NO	

Storage Tank/Vessel Attributes

Form OP-UA3 (Page 10)

Federal Operating Permit Program

Table 8b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart DD: National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations

Texas Commission on Environmental Quality

Date				Permit No.				Regulated Entity No.			
3/11/2025				01896				RN111009247			
Unit ID No.	SOP Index No.	Bulk Feed	Existing Source	Tank Emissions Control	Level 2 Controls	Closed Vent System	Tank Type	Inspected and Monitored	Bypass Device	Flow Meter	Design Analysis
GRP-TF10	63DD-GRP-TF101	NO	YES	TL1T3	YES		CVS/CD	NO	NO		YES
GRP-TF10	63DD-GRP-TF102	NO	YES	TL1T3	YES		CVS/CD	NO	NO		NO
GRP-TF10	63DD-GRP-TF103	NO	YES	CVS			CVS/CD	NO	NO		YES
GRP-TF10	63DD-GRP-TF104	NO	YES	CVS			CVS/CD	NO	NO		NO
GRP-TF30	63DD-GRP-TF301	NO	YES	TL1T3	YES		CVS/CD	NO	NO		YES
GRP-TF30	63DD-GRP-TF302	NO	YES	TL1T3	YES		CVS/CD	NO	NO		NO
GRP-TF30	63DD-GRP-TF303	NO	YES	CVS			CVS/CD	NO	NO		YES
GRP-TF30	63DD-GRP-TF304	NO	YES	CVS			CVS/CD	NO	NO		NO

Storage Tank/Vessel Attributes

Form OP-UA3 (Page 11)

Federal Operating Permit Program

Table 8c: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart DD: National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations

Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
3/11/2025	01896	RN111009247

Unit ID No.	SOP Index No.	No Detectable Organic Emissions	Control Device Type	Control Device ID No.	Alternative Operating Parameters	AOP ID No.	HAP Recovery	Regenerable Carbon Adsorber	Complying with §63.693(d)(4)(iii)	Exhaust Stream Temp Monitor
GRP-TF10	63DD-GRP-TF101	YES	CADS	INC-TFCB	NO		YES	NO	YES	
GRP-TF10	63DD-GRP-TF102	NO	VAPTH	INC-INCO1	NO					
GRP-TF10	63DD-GRP-TF103	YES	CADS	INC-TFCB	NO		YES	NO	YES	
GRP-TF10	63DD-GRP-TF104	NO	VAPTH	INC-INCO1	NO					
GRP-TF30	63DD-GRP-TF301	YES	CADS	INC-TFCB	NO		YES	NO	YES	
GRP-TF30	63DD-GRP-TF302	NO	VAPTH	INC-INCO1	NO					
GRP-TF30	63DD-GRP-TF303	YES	CADS	INC-TFCB	NO		YES	NO	YES	
GRP-TF30	63DD-GRP-TF304	NO	VAPTH	INC-INCO1	NO					

Storage Tank/Vessel Attributes

Form OP-UA3 (Page 12)

Federal Operating Permit Program

Table 8d: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart DD: National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations

Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
3/11/2025	01896	RN111009247

Unit ID No.	SOP Index No.	HAP Destruction	Organic Monitoring Device	Meets 40 CFR §63.693(f)(1)(iii)	95% HAP Destruction	BPH TOC Destruction	95% TOC Destruction	Meets 40 CFR §63.693(g)(1)(iii)	Introduced with Fuel	Continuous Temperature Monitoring System
GRP-TF10	63DD-GRP-TF101									
GRP-TF10	63DD-GRP-TF102	NO	NO	YES						
GRP-TF10	63DD-GRP-TF103									
GRP-TF10	63DD-GRP-TF104	NO	NO	YES						
GRP-TF30	63DD-GRP-TF301									
GRP-TF30	63DD-GRP-TF302	NO	NO	YES						
GRP-TF30	63DD-GRP-TF303									
GRP-TF30	63DD-GRP-TF304	NO	NO	YES						

Storage Tank/Vessel Attributes
Form OP-UA3 (Page 21)
Federal Operating Permit Program
Table 12a: Title 40 Code of Federal Regulations Part 61 (40 CFR Part 61)
Subpart FF: National Emission Standards for Benzene Waste Operations (Tanks)
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
3/11/2025	01896	RN111009247

Unit ID No.	SOP Index No.	Waste Treatment Tank	Alternative Standards for Tanks	Kb Tank Type	AMEL ID No.	Seal Type	Alternative Means of Compliance	AMOC ID No.
GRP-TF30	61FF-GRP-TF301	YES	NO				NO	
GRP-TF30	61FF-GRP-TF302	YES	NO				NO	
GRP-TF10	61FF-GRP-TF101	YES	NO				NO	
GRP-TF10	61FF-GRP-TF102	YES	NO				NO	

Storage Tank/Vessel Attributes
Form OP-UA3 (Page 22)
Federal Operating Permit Program
Table 12b: Title 40 Code of Federal Regulations Part 61 (40 CFR Part 61)
Subpart FF: National Emission Standards for Benzene Waste Operations (Tanks)
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
3/11/2025	01896	RN111009247

Unit ID No.	SOP Index No.	Tank Control Requirements	Fuel Gas System	Closed Vent System and Control Device	Cover and Closed Vent	Closed Vent System and Control Device AMOC	CVS/CD AMOC ID No.
GRP-TF30	61FF-GRP-TF301	CVS-CD	NO		YES	NO	
GRP-TF30	61FF-GRP-TF302	CVS-CD	NO		NO	NO	
GRP-TF10	61FF-GRP-TF101	CVS-CD	NO		YES	NO	
GRP-TF10	61FF-GRP-TF102	CVS-CD	NO		NO	NO	

Storage Tank/Vessel Attributes
Form OP-UA3 (Page 23)
Federal Operating Permit Program
Table 12c: Title 40 Code of Federal Regulations Part 61 (40 CFR Part 61)
Subpart FF: National Emission Standards for Benzene Waste Operations (Tanks)
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
3/11/2025	01896	RN111009247

Unit ID No.	SOP Index No.	Bypass Line	Bypass Line Valve	Control Device Type/Operations	Control Device ID No.	Engineering Calculations	Alternative Monitoring Parameters	Carbon Replacement Interval
GRP-TF30	61FF-GRP-TF301	NO		THERM95	INC-INC01	NO	NO	
GRP-TF30	61FF-GRP-TF302	NO		CARADS	INC-TFCB	YES		NO
GRP-TF10	61FF-GRP-TF101	NO		THERM95	INC-INC01	NO	NO	
GRP-TF10	61FF-GRP-TF102	NO		CARADS	INC-TFCB	YES		NO

Storage Tank/Vessel Attributes
Form OP-UA3 (Page 26)
Federal Operating Permit Program
Table 14a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart G: National Emission Standards for Organic Hazardous Air Pollutants from Synthetic Organic
Chemical Manufacturing Industry Wastewater
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
3/11/2025	01896	RN111009247

Unit ID No.	SOP Index No.	Process Wastewater	Meets 40 CFR §63.149(d)	Sparged	Emission Routing	Installed Before 12/31/92
GRP-TF30	63G-GRP-TF303					
GRP-TF30	63G-GRP-TF304					
GRP-TF10	63G-GRP-TF101					
GRP-TF10	63G-GRP-TF102					

Closed - Vent System and Control Device Attributes
Form OP-UA52 (Page 1)
Federal Operating Permit Program
Table 1: Title 40 Code of Federal Regulations Part 61 (40 CFR Part 61)
Subpart FF: National Emission Standards for Benzene Waste Operations
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
3/11/2025	01896	RN111009247

Control Device ID No.	SOP Index No.	Unit Type	Close Vent System And Control Device AMOC	CVS/CD AMOC ID No.	By-pass Line	By-pass Line Valve	Control Device Type/Operation	Engineering Calculations	Alternate Monitoring Parameters	Carbon Replacement Interval
INC-CB02 INC-TFCB	61FF-CB-1A	CONT	NO		NO		CARADS	YES		NO

System and Control Device Attributes

Form OP-UA52 (Page 5)

Federal Operating Permit Program

Table 4a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

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

The Synthetic Organic Chemical Manufacturing Industry for Wastewater

Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
3/11/2025	01896	RN111009247

Control Device ID No.	SOP Index No.	Unit Type	New Source	Closed Vent System	By-pass Lines	Combination of Control Devices	Control Device Types	Compliance With Title 40 CFR §63.139(c)(1)
INC-INC01	63G-INC-1A							

Treatment Process Attributes
Form OP-UA58 (Page 5)
Federal Operating Permit Program
Table 3a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart G: National Emission Standards for Organic Hazardous Air Pollutants
From Synthetic Organic Chemical Manufacturing Industry Wastewater
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
3/11/2025	01896	RN111009247

Process ID No.	SOP Index No.	Series of Processes	Hard Piping	Compliance Under Title 40 CFR § 63.138(a)(7)(ii)	Series Design Evaluation	Biological Treatment Process	Wastewater Stream Designation	Wastewater Stream Treatment	Treatment Process Design Evaluation	Performance Test Exemption
INC-INC01	63G-INC-INC01									

4. APPLICABLE REQUIREMENTS SUMMARY FORMS

This section contains the following forms and information:

- ▶ Form OP-REQ1 (page 88-89) – Section XII.E-J from Application Area-Wide Applicability Determinations and General Information
- ▶ Form OP-REQ3 – Applicable Requirements Summary
- ▶ Form OP-MON – Monitoring Requirements

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 88)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
03/11/2025	O1896	RN111009247

For SOP applications, answer ALL questions unless otherwise directed.

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

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

E. PSD Permits and PSD Major Pollutants

Permit No.	Issuance Date	Pollutant(s):	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

Permit No.	Issuance Date	Pollutant(s):	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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 89)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
03/11/2025	O1896	RN111009247

For SOP applications, answer ALL questions unless otherwise directed.

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

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

- ◆ **H. Title 30 TAC Chapter 116 Permits, Special Permits, Standard Permits, Other Authorizations (Other Than Permits By Rule, PSD Permits, NA Permits) for the Application Area**

Authorization No.	Issuance Date	Authorization No.	Issuance Date	Authorization No.	Issuance Date
160845	09/18/2024				
174824	01/03/2024				

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

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

PBR No.	Version No./Date	PBR No.	Version No./Date	PBR No.	Version No./Date
106.261	11/01/2003				
106.263	11/01/2001				
106.472	09/04/2000				
106.511	09/04/2000				

- ◆ **J. Municipal Solid Waste and Industrial Hazardous Waste Permits with an Air Addendum**

Permit No.	Issuance Date	Permit No.	Issuance Date	Permit No.	Issuance Date

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

Table 1a: Additions

Date: 3/11/2025	Regulated Entity No.: RN111009247	Permit No.: 01896
Company Name: Heritage Thermal of Texas, LLC	Area Name: Sabine Regional Incinerator	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	GRP-TF10	OP-UA3	61FF-GRP-TF102	Benzene	40 CFR Part 61 Subpart FF	§61.343(a)(1) §61.343(a)(1)(i)(A) §61.343(a)(1)(i)(B) §61.343(c), (d) §61.349(a) §61.349(a)(1)(i) §61.349(a)(1)(iii)-(iv) §61.349(a)(2)(ii) §61.349(b), (e)-(g)
2	GRP-TF10	OP-UA3	63DD-GRP-TF101	112(B) HAPS	40 CFR Part 63 Subpart DD	§ 63.680(a) The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 63, Subpart DD
2	GRP-TF10	OP-UA3	63DD-GRP-TF103	112(B) HAPS	40 CFR Part 63 Subpart DD	§ 63.680(a) The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 63, Subpart DD
1	GRP-TF30	OP-UA3	61FF-GRP-TF302	Benzene	40 CFR Part 61 Subpart FF	§61.343(a)(1) §61.343(a)(1)(i)(A) §61.343(a)(1)(i)(B) §61.343(c), (d) §61.349(a) §61.349(a)(1)(i) §61.349(a)(1)(iii)-(iv) §61.349(a)(2)(ii) §61.349(b), (e)-(g)
1	GRP-TF30	OP-UA3	63DD-GRP-TF301	112(B) HAPS	40 CFR Part 63 Subpart DD	§ 63.680(a) The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 63, Subpart DD
1	GRP-TF30	OP-UA3	63DD-GRP-TF302	112(B) HAPS	40 CFR Part 63 Subpart DD	§ 63.680(a) The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 63, Subpart DD

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

Table 1b: Additions

Date: 3/11/2025	Regulated Entity No.: RN111009247	Permit No.: 01896
Company Name: Heritage Thermal of Texas, LLC	Area Name: Sabine Regional Incinerator	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	GRP-TF10	61FF-GRP-TF102	Benzene	§61.343(a)(1)(i)(A), (c) §61.349(a)(1)(i), (e), (f) §61.354(d) [G]§61.355(h)	§61.356(d) §61.356(f), (f)(1) §61.356(f)(2) §61.356(f)(2)(i) §61.356(f)(2)(i)(G) §61.356(g), (h) §61.356(j), (j)(1)-(3) §61.356(j)(10)	None
2	GRP-TF10	63DD-GRP-TF101	112(B) HAPS	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 63, Subpart DD	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 63, Subpart DD	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 63, Subpart DD
2	GRP-TF10	63DD-GRP-TF103	112(B) HAPS	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 63, Subpart DD	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 63, Subpart DD	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 63, Subpart DD
1	GRP-TF30	61FF-GRP-TF302	Benzene	§61.343(a)(1)(i)(A), (c) §61.349(a)(1)(i), (e), (f) §61.354(d) [G]§61.355(h)	§61.356(d) §61.356(f), (f)(1) §61.356(f)(2) §61.356(f)(2)(i) §61.356(f)(2)(i)(G) §61.356(g), (h) §61.356(j), (j)(1)-(3) §61.356(j)(10)	None
1	GRP-TF30	63DD-GRP-TF301	112(B) HAPS	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 63, Subpart DD	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 63, Subpart DD	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 63, Subpart DD
1	GRP-TF30	63DD-GRP-TF302	112(B) HAPS	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 63, Subpart DD	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 63, Subpart DD	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 63, Subpart DD

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

Table 1a: Additions

Date: 3/11/2025	Regulated Entity No.: RN111009247	Permit No.: 01896
Company Name: Heritage Thermal of Texas, LLC	Area Name: Sabine Regional Incinerator	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
1	GRP-TF30	OP-UA3	63DD-GRP-TF303	112(B) HAPS	40 CFR Part 63 Subpart DD	§ 63.680(a) The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 63, Subpart DD
1	GRP-TF30	OP-UA3	63DD-GRP-TF304	112(B) HAPS	40 CFR Part 63 Subpart DD	§ 63.680(a) The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 63, Subpart DD

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

Table 1b: Additions

Date: 3/11/2025	Regulated Entity No.: RN111009247	Permit No.: 01896
Company Name: Heritage Thermal of Texas, LLC	Area Name: Sabine Regional Incinerator	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
1	GRP-TF30	63DD-GRP-TF303	112(B) HAPS	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 63, Subpart DD	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 63, Subpart DD	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 63, Subpart DD
1	GRP-TF30	63DD-GRP-TF304	112(B) HAPS	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 63, Subpart DD	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 63, Subpart DD	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 63, Subpart DD

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

Table 2a: Deletions

Date: 3/11/2025				Regulated Entity No.: RN111009247		Permit No.: 01896	
Company Name: Heritage Thermal of Texas, LLC				Area Name: Sabine Regional Incinerator			
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)	
5	INC-INC01	OP-UA52	63G-INC-1A	112(B) HAPS	40 CFR Part 63, Subpart G	§ 63.135(d) § 63.135(d)(4) § 63.139(b) § 63.139(d)(4)(iv) § 63.139(f) § 63.140(a) § 63.140(b) § 63.140(c)	

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

Table 2b: Deletions

Date: 3/11/2025			Regulated Entity No.: RN111009247			Permit No.: 01896
Company Name: Heritage Thermal of Texas, LLC			Area Name: Sabine Regional Incinerator			
Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
5	INC-INCO1	63G-INC-1A	112(B) HAPS	None	§ 63.147(b)(2) [G]§ 63.152(a)	§ 63.146(b)(2) § 63.146(b)(5) [G]§ 63.151(a)(6) [G]§ 63.151(b) § 63.151(e) § 63.151(e)(1) § 63.151(e)(2) § 63.151(e)(3) [G]§ 63.151(j) [G]§ 63.152(a) § 63.152(b) [G]§ 63.152(b)(1) § 63.152(b)(4) § 63.152(c)(1) § 63.152(c)(3) § 63.152(c)(3)(i) § 63.152(c)(3)(ii) § 63.152(c)(4)(ii) [G]§ 63.152(c)(6)

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

Table 2a: Deletions

Date: 3/11/2025				Regulated Entity No.: RN111009247		Permit No.: 01896	
Company Name: Heritage Thermal of Texas, LLC				Area Name: Sabine Regional Incinerator			
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)	
5	INC-INC01	OP-UA58	63G-INC-INC01	112(B) HAPS	40 CFR Part 63, Subpart G	§ 63.138(h) [G]§ 63.132(f) § 63.138(h)(1) § 63.138(h)(2)(i) § 63.138(h)(2)(ii) § 63.138(h)(3) [G]§ 63.138(k) § 63.140(a) § 63.140(b) § 63.140(c) § 63.144(a)	
2	GRP-TF10	OP-UA3	63G-GRP-TF101	112(B) HAPS	40 CFR Part 63, Subpart G	§ 63.133(a)(2)(i) § 63.132(a)(2)(i)(A) § 63.132(a)(2)(i)(B) [G]§ 63.132(f) § 63.133(b)(1)(ii) § 63.133(b)(4) § 63.133(f) § 63.133(h) § 63.139(b) § 63.139(d)(4)(iv) § 63.139(f) § 63.140(a) § 63.140(b) § 63.140(c) § 63.144(a)	

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

Table 2b: Deletions

Date: 3/11/2025			Regulated Entity No.: RN111009247			Permit No.: 01896
Company Name: Heritage Thermal of Texas, LLC			Area Name: Sabine Regional Incinerator			
Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
5	INC-INCO1	63G-INC-INCO1	112(B) HAPS	None	§ 63.147(b) § 63.147(b)(7) [G]§ 63.152(a) [G]§ 63.152(f)	§ 63.146(b)(2) § 63.146(b)(4) § 63.146(b)(5) § 63.146(b)(6) [G]§ 63.151(b) § 63.151(e) § 63.151(e)(1) § 63.151(e)(2) § 63.151(e)(3) [G]§ 63.151(j) [G]§ 63.152(a) § 63.152(b) [G]§ 63.152(b)(1) § 63.152(c)(1) § 63.152(c)(4)(ii) [G]§ 63.152(c)(6)
2	GRP-TF10	63G-GRP-TF101	112(B) HAPS	§ 63.133(f) § 63.133(g) § 63.133(g)(3)	§ 63.133(h) § 63.147(b) § 63.147(b)(1) § 63.147(b)(2) § 63.147(b)(6) [G]§ 63.152(a)	§ 63.146(b)(2), (b)(5), (b)(6) § 63.146(g) [G]§ 63.151(b) § 63.151(e) [G]§ 63.151(e)(1), (e)(2), (e)(3) [G]§ 63.151(j) [G]§ 63.152(a) § 63.152(b) [G]§ 63.152(b)(1) [G]§ 63.152(b)(2) § 63.152(b)(4) § 63.152(c)(1), (c)(3) § 63.152(c)(3)(i) § 63.152(c)(3)(ii) § 63.152(c)(4)(ii) [G]§ 63.152(c)(6)

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

Table 2a: Deletions

Date: 3/11/2025	Regulated Entity No.: RN111009247	Permit No.: 01896
Company Name: Heritage Thermal of Texas, LLC	Area Name: Sabine Regional Incinerator	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	GRP-TF10	OP-UA3	63G-GRP-TF102	112(B) HAPS	40 CFR Part 63, Subpart G	§ 63.133(a)(2)(i) § 63.132(a)(2)(i)(A) § 63.132(a)(2)(i)(B) [G]§ 63.132(f) § 63.133(b)(1)(ii) § 63.133(b)(4) § 63.133(f) § 63.133(h) § 63.139(b) § 63.139(c)(2) § 63.139(f) § 63.140(a) § 63.140(b) § 63.140(c) § 63.144(a)
1	GRP-TF30	OP-UA3	63G-GRP-TF303	112(B) HAPS	40 CFR Part 63, Subpart G	§ 63.133(a)(2)(i) § 63.132(a)(2)(i)(A) § 63.132(a)(2)(i)(B) [G]§ 63.132(f) § 63.133(b)(1)(ii) § 63.133(b)(4) § 63.133(f) § 63.133(h) § 63.139(b) § 63.139(d)(4)(iv) § 63.139(f) § 63.140(a) § 63.140(b) § 63.140(c) § 63.144(a)

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

Table 2b: Deletions

Date: 3/11/2025	Regulated Entity No.: RN111009247	Permit No.: 01896
Company Name: Heritage Thermal of Texas, LLC	Area Name: Sabine Regional Incinerator	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	GRP-TF10	63G-GRP-TF102	112(B) HAPS	§ 63.133(f) § 63.133(g) § 63.133(g)(3) § 63.139(d)(2)(vi) § 63.145(a)(2)	§ 63.133(h) § 63.147(b) § 63.147(b)(1) § 63.147(b)(6) § 63.147(d)(3) [G]§ 63.147(d)(3)(ii) [G]§ 63.152(a)	§ 63.146(b)(2), (b)(5), (b)(6), (b)(7) § 63.146(b)(7)(iii) § 63.146(b)(7)(ii)(A) § 63.146(b)(7)(ii)(B) § 63.146(e), (e)(1) § 63.146(g) [G]§ 63.151(b) § 63.151(e) [G]§ 63.151(e)(1), (e)(2), (e)(3) [G]§ 63.151(j) [G]§ 63.152(a) § 63.152(b) [G]§ 63.152(b)(1) [G]§ 63.152(b)(2) § 63.152(b)(4) § 63.152(c)(1), (c)(2) § 63.152(c)(2)(i) [G]§ 63.152(c)(2)(ii) § 63.152(c)(2)(iii) § 63.152(c)(2)(iv) § 63.152(c)(3) § 63.152(c)(3)(i) § 63.152(c)(3)(ii) § 63.152(c)(4)(ii) [G]§ 63.152(c)(6)
1	GRP-TF30	63G-GRP-TF303	112(B) HAPS	§ 63.133(f) § 63.133(g) § 63.133(g)(3)	§ 63.133(h) § 63.147(b) § 63.147(b)(1) § 63.147(b)(2) § 63.147(b)(6) [G]§ 63.152(a)	§ 63.146(b)(2), (b)(5), (b)(6) § 63.146(g) [G]§ 63.151(b) § 63.151(e) [G]§ 63.151(e)(1), (e)(2), (e)(3) [G]§ 63.151(j) [G]§ 63.152(a) § 63.152(b) [G]§ 63.152(b)(1) [G]§ 63.152(b)(2) § 63.152(b)(4) § 63.152(c)(1) § 63.152(c)(3) § 63.152(c)(3)(i) § 63.152(c)(3)(ii) § 63.152(c)(4)(ii) [G]§ 63.152(c)(6)

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

Table 2a: Deletions

Date: 3/11/2025				Regulated Entity No.: RN111009247		Permit No.: 01896	
Company Name: Heritage Thermal of Texas, LLC				Area Name: Sabine Regional Incinerator			
Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)	
1	GRP-TF30	OP-UA3	63G-GRP-TF304	112(B) HAPS	40 CFR Part 63, Subpart G	§ 63.133(a)(2)(i) § 63.132(a)(2)(i)(A) § 63.132(a)(2)(i)(B) [G]§ 63.132(f) § 63.133(b)(1)(ii) § 63.133(b)(4) § 63.133(f) § 63.133(h) § 63.139(b) § 63.139(c)(2) § 63.139(f) § 63.140(a) § 63.140(b) § 63.140(c) § 63.144(a)	

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

Table 2b: Deletions

Date: 3/11/2025			Regulated Entity No.: RN111009247			Permit No.: 01896
Company Name: Heritage Thermal of Texas, LLC			Area Name: Sabine Regional Incinerator			
Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
1	GRP-TF30	63G-GRP-TF304	112(B) HAPS	§ 63.133(f) § 63.133(g) § 63.133(g)(3) § 63.139(d)(2)(vi) § 63.145(a)(2)	§ 63.133(h) § 63.147(b) § 63.147(b)(1) § 63.147(b)(6) § 63.147(d)(3) [G]§ 63.147(d)(3)(ii) [G]§ 63.152(a)	§ 63.146(b)(2), (b)(5), (b)(6), (b)(7) § 63.146(b)(7)(iii) § 63.146(b)(7)(ii)(A) § 63.146(b)(7)(ii)(B) § 63.146(e) § 63.146(e)(1) § 63.146(g) [G]§ 63.151(b) § 63.151(e) [G]§ 63.151(e)(1), (e)(2), (e)(3) [G]§ 63.151(j) [G]§ 63.152(a), (b) [G]§ 63.152(b)(1) [G]§ 63.152(b)(2) § 63.152(b)(4) § 63.152(c)(1), (c)(2) § 63.152(c)(2)(i) [G]§ 63.152(c)(2)(ii) § 63.152(c)(2)(iii) § 63.152(c)(2)(iv) § 63.152(c)(3) § 63.152(c)(3)(i) § 63.152(c)(3)(ii) § 63.152(c)(4)(ii) [G]§ 63.152(c)(6)

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

I. Identifying Information		
Account No.: NA	RN No.: 111009247	CN: 605764703
Permit No: O1896	Project No.: TBD	
Area Name: Sabine Regional Incinerator		
Company Name: Heritage Thermal of Texas, LLC		
II. Unit/Emission Point/Group/Process Information		
Revision No.: 1		
Unit/EPN/Group/Process ID No.: GRP-TF30		
Applicable Form: OP-UA3		
III. Applicable Regulatory Requirement		
Name: 40 CFR Part 60, Subpart Kb		
SOP/GOP Index No.: 60Kb-GRP-TF307		
Pollutant: VOC		
Main Standard: [G]§ 60.112b(a)(3)		
Monitoring Type: PM		
Unit Size:		
Deviation Limit: When breakthrough of 50 ppmv VOC occurs in the first canister and the waste gas flow isn't switched to the second canister.		
IV. Control Device Information		
Control Device ID No.: INC-TFCB		
Device Type: CRBAD2		
V. CAM Case-by-case		
Indicator:		
Minimum Frequency:		
Averaging Period:		
QA/QC Procedures:		
Verification Procedures:		
Representative Date:		
VI. Periodic Monitoring Case-by-case		
Indicator: VOC Concentration	Minimum Frequency: Daily (when in use)	
Averaging Period: N/A		

I. Identifying Information

Periodic Monitoring Text: When the tank emissions are routed to the carbon adsorption system, measure and record the VOC concentration using a continuous emission monitoring system (CEMS) to determine breakthrough of volatile organic compounds (VOC). The CEMS shall meet the design and performance specifications, pass the field tests, meet the installation requirements, and complete the data analysis and reporting requirements specified in Performance Specification 8, Title 40 Code of Federal Regulation Part 60 (40 CFR Part 60), Appendix B. The CEMS sampling probe shall be placed in the vent stream at the outlet of the primary carbon canister and prior to the secondary (polishing) carbon canister. The maximum VOC concentration is established as required in the Consent Decree: DJ # 90-7-1-10173 (Civil Action No. 1:21-cv-00516 E.D. Texas). When the condition of breakthrough of VOC from the initial saturation canister occurs, the waste gas flow shall be immediately switched to the second canister with the second canister becoming the primary canister and the event shall be recorded. Fresh carbon shall be replaced in the expired canister within 24 hours. Once fresh carbon has been replaced in the expired canister, it shall be placed into service as the second (polishing) canister. A sufficient inventory of new activated carbon shall be maintained at the site to ensure compliance with the canister refill timeline. If the waste gas flow is not switched from the canister indicating breakthrough and the event is not recorded, it shall be considered and reported as a deviation. During any CEMS downtime or out-of-control period exceeding 24 hours, the corresponding emission source shall be shut down or the CAS exhaust and vent between the first and second canister shall be sampled daily. The VOC sampling and analysis shall be performed using an instrument with a flame ionization detector (FID), or a TCEQ-approved alternative detector. The instrument/FID must meet all requirements specified in Section 8.1 of EPA Method 21 (40 CFR 60, Appendix A).

Basis of monitoring: A common way to monitor a non-regenerative carbon adsorption system is by monitoring the outlet VOC concentration with an analyzer with procedures such as EPA Test Method 25A or a VOC CEMS. An increase in VOC concentration demonstrates when the carbon canister needs to be replaced. This indicator is consistent with the EPA "CAM Technical Guidance Document" (August 1998). Outlet VOC concentration has been used as an indicator of VOC emissions in many federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, and RRR; and 30 TAC Chapter 115.

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

I. Identifying Information		
Account No.: NA	RN No.: 111009247	CN: 605764703
Permit No: O1896	Project No.: TBD	
Area Name: Sabine Regional Incinerator		
Company Name: Heritage Thermal of Texas, LLC		
II. Unit/Emission Point/Group/Process Information		
Revision No.: 1		
Unit/EPN/Group/Process ID No.: GRP-TF30		
Applicable Form: OP-UA3		
III. Applicable Regulatory Requirement		
Name: 40 CFR Part 60, Subpart Kb		
SOP/GOP Index No.: 60Kb-GRP-TF308		
Pollutant: VOC		
Main Standard: § 60.112b(b)(1)		
Monitoring Type: PM		
Unit Size:		
Deviation Limit: When breakthrough of 50 ppmv VOC occurs in the first canister and the waste gas flow isn't switched to the second canister.		
IV. Control Device Information		
Control Device ID No.: INC-TFCB		
Device Type: CRBAD2		
V. CAM Case-by-case		
Indicator:		
Minimum Frequency:		
Averaging Period:		
QA/QC Procedures:		
Verification Procedures:		
Representative Date:		
VI. Periodic Monitoring Case-by-case		
Indicator: VOC Concentration	Minimum Frequency: Daily (when in use)	
Averaging Period: N/A		

I. Identifying Information

Periodic Monitoring Text: When the tank emissions are routed to the carbon adsorption system, measure and record the VOC concentration using a continuous emission monitoring system (CEMS) to determine breakthrough of volatile organic compounds (VOC). The CEMS shall meet the design and performance specifications, pass the field tests, meet the installation requirements, and complete the data analysis and reporting requirements specified in Performance Specification 8, Title 40 Code of Federal Regulation Part 60 (40 CFR Part 60), Appendix B. The CEMS sampling probe shall be placed in the vent stream at the outlet of the primary carbon canister and prior to the secondary (polishing) carbon canister. The maximum VOC concentration is established as required in the Consent Decree: DJ # 90-7-1-10173 (Civil Action No. 1:21-cv-00516 E.D. Texas). When the condition of breakthrough of VOC from the initial saturation canister occurs, the waste gas flow shall be immediately switched to the second canister with the second canister becoming the primary canister and the event shall be recorded. Fresh carbon shall be replaced in the expired canister within 24 hours. Once fresh carbon has been replaced in the expired canister, it shall be placed into service as the second (polishing) canister. A sufficient inventory of new activated carbon shall be maintained at the site to ensure compliance with the canister refill timeline. If the waste gas flow is not switched from the canister indicating breakthrough and the event is not recorded, it shall be considered and reported as a deviation. During any CEMS downtime or out-of-control period exceeding 24 hours, the corresponding emission source shall be shut down or the CAS exhaust and vent between the first and second canister shall be sampled daily. The VOC sampling and analysis shall be performed using an instrument with a flame ionization detector (FID), or a TCEQ-approved alternative detector. The instrument/FID must meet all requirements specified in Section 8.1 of EPA Method 21 (40 CFR 60, Appendix A).

Basis of monitoring: A common way to monitor a non-regenerative carbon adsorption system is by monitoring the outlet VOC concentration with an analyzer with procedures such as EPA Test Method 25A or a VOC CEMS. An increase in VOC concentration demonstrates when the carbon canister needs to be replaced. This indicator is consistent with the EPA "CAM Technical Guidance Document" (August 1998). Outlet VOC concentration has been used as an indicator of VOC emissions in many federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, and RRR; and 30 TAC Chapter 115.

Texas Commission on Environmental Quality

Title V Existing

1896

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	SABINE REGIONAL INCINERATOR
Does the site have a physical address?	Yes
Physical Address	
Number and Street	2735 FM 1006 # B400
City	ORANGE
State	TX
ZIP	77630
County	ORANGE
Latitude (N) (##.#####)	30.057777
Longitude (W) (-###.#####)	93.775833
Primary SIC Code	4953
Secondary SIC Code	
Primary NAICS Code	562211
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN111009247
What is the name of the Regulated Entity (RE)?	HERITAGE THERMAL OF TEXAS
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	2735 FM 1006 # B4000
City	ORANGE
State	TX
ZIP	77630
County	ORANGE
Latitude (N) (##.#####)	30.053364
Longitude (W) (-###.#####)	-93.755251
Facility NAICS Code	
What is the primary business of this entity?	HAZARDOUS WASTE TREATMENT AND DISPOSAL FACILITY

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN605764703
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Heritage Thermal of Texas, LLC
Texas SOS Filing Number	803491807
Federal Tax ID	843568182
State Franchise Tax ID	32072792602

State Sales Tax ID	
Local Tax ID	
DUNS Number	
Number of Employees	21-100
Independently Owned and Operated?	No

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	HERITAGE THERMAL OF TEXAS LLC
Prefix	MR
First	TIMOTHY
Middle	
Last	BYARS
Suffix	
Credentials	
Title	VICE PRESIDENT OF OPERATIONS
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 3861
Routing (such as Mail Code, Dept., or Attn:)	
City	ORANGE
State	TX
ZIP	77631
Phone (###-###-####)	4092892774
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	tbyars@heritage-enviro.com

Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application

Select existing DAR contact or enter a new contact.

Organization Name	Heritage Thermal of Texas Inc
Prefix	MR
First	Vincent
Middle	
Last	Waggle
Suffix	
Credentials	
Title	Quality Control Manager
Enter new address or copy one from list	
Mailing Address	
Address Type	Domestic

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

PO BOX 3861

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

City

ORANGE

State

TX

Zip

77631

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

4195400241

Extension

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

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

E-mail

vwaggle@heritage-enviro.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

New Contact

Organization Name

Heritage Thermal of Texas Inc

Prefix

MR

First

Vincent

Middle

Last

Waggle

Suffix

Credentials

Title

Quality Control Manager

Enter new address or copy one from list:

Mailing Address

Address Type

Domestic

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

PO BOX 3861

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

City

ORANGE

State

TX

ZIP

77631

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

4195400241

Extension

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

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

E-mail

vwaggle@heritage-enviro.com

Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

30 Deg 3 Min 28 Sec

3) Permit Longitude Coordinate:

93 Deg 46 Min 33 Sec

4) Is this submittal a new application or an update to an existing application?

New Application

4.1. What type of permitting action are you applying for?

Streamlined Revision

4.1.1. Are there any permits that should be voided upon issuance of this permit application

No

through permit conversion?

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

No

5) Who will electronically sign this Title V application?

Duly Authorized Representative

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

No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

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

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

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

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

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name

Heritage Thermal SOP O1896 Revision Application 2025-0311.pdf

Hash

D5770B597007F7714A4B591EC510D3D1F03768477F01AA3F0A98C1DFFE31665F

MIME-Type

application/pdf

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

Expedite Title V

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

No

Certification

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

1. I am Vincent R Waggle, the owner of the STEERS account ER076627.
2. I have the authority to sign this data on behalf of the applicant named above.
3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
8. I am knowingly and intentionally signing Title V Existing 1896.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEC

OWNER OPERATOR Signature: Vincent R Waggle OWNER OPERATOR

Account Number:	ER076627
Signature IP Address:	38.104.214.22
Signature Date:	2025-03-13
Signature Hash:	7865B9ACD8B11C855A9B8D98AB240540D53246822583D23C527243EB8904E1B0
Form Hash Code at time of Signature:	77675D7B8100C6016FB92CF6FE26DF9A1774E60D639561E16920A94E130C9836

Submission

Reference Number:	The application reference number is 607177
Submitted by:	The application was submitted by ER076627/Vincent R Waggle
Submitted Timestamp:	The application was submitted on 2025-03-13 at 12:06:45 CDT
Submitted From:	The application was submitted from IP address 38.104.214.22
Confirmation Number:	The confirmation number is 638891
Steers Version:	The STEERS version is 6.88
Permit Number:	The permit number is 1896

Additional Information

Application Creator: This account was created by Kelley Oswald