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From: [Ayala, Rebecca R.](#)
To: [Liam Lin](#)
Cc: [Davis, Les L.](#)
Subject: RE: [EXTERNAL] Technical Review - FOP O1348 / Project 38512, Western Refining Company LLC/ El Paso Refinery
Date: Tuesday, August 5, 2025 4:10:40 PM

Thank you, Liam.

Rebecca

Rebecca Ayala
Adv Environmental Engineer
El Paso Refinery

Marathon Petroleum Corporation
212 N. Clark St
El Paso, Texas 79905
M: 915-526-6394



From: Liam Lin <Liam.Lin@tceq.texas.gov>
Sent: Tuesday, August 5, 2025 3:03 PM
To: Ayala, Rebecca R. <RAyala@marathonpetroleum.com>
Cc: Davis, Les L. <lldavis@marathonpetroleum.com>
Subject: [EXTERNAL] Technical Review - FOP O1348 / Project 38512, Western Refining Company LLC/ El Paso Refinery

Good Afternoon Ms. Ayala,

I have been assigned to the Federal Operating Permit (FOP) renewal application of Permit No. O1348 for Western Refining Company LLC, El Paso Refinery. This application has been assigned Project No. 38512. 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-PBRSUP and OP-REQ1 Instructions.

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

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

Please notify me when these updates have been submitted.

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

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

Thank you for your cooperation.

Sincerely,

Liam Lin

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

Liam.Lin@tceq.texas.gov

Phone: (512) 239-1278

Fax: (512) 239-1400



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**Storage Tank/Vessel Attributes
Form OP-UA3
Federal Operating Permit Program
Texas Commission on Environmental Quality**

**Table 10d: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart CC: National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries**

Unit ID No.	SOP Index No.	Control Device Type	Control Device ID No.	Meets §63.985(b)(2)	Prior Eval	Assessment Waiver	Assessment Waiver ID	Prior Test	Negative Pressure	Bypass Line

[Go to the Table of Contents](#)

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

I. Identifying Information		
Account No.: EE0015H	RN No.: RN100213016	CN: CN601510191
Permit No.: O1348	Project No.: 38512	
Area Name: El Paso Refinery		
Company Name: Western Refining Company, L.P.		
II. Unit/Emission Point/Group/Process Information		
Revision No.:		
Unit/EPN/Group/Process ID No.: T-4607		
Applicable Form:		
III. Applicable Regulatory Requirement		
Name: 30 TAC Chapter 115		
SOP/GOP Index No.: R5112-3		
Pollutant: VOC		
Main Standard: 115.112(a)(1)		
IV. Title V Monitoring Information		
Monitoring Type: PM		
Unit Size:		
CAM/PM Option No.: PM-V-006		
Deviation Limit: 300 Btu/scf or greater for steam assisted flares		
CAM/PM Option No.:		
Deviation Limit:		
V. Control Device Information		
Control Device ID No.: 112		
Control Device Type: Flare		

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

Table 1b: CAM/PM Control Device Additions

Emission Unit ID No.	Control Device ID No.	Control Device Type
T-4607	112	Flare
T-4607	R-2911	Flare
T-4607	D-2914	Flare

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

I. Identifying Information		
Account No.: EE0015H	RN No.: RN100213016	CN: CN601510191
Permit No.: O1348	Project No.: 38512	
Area Name: El Paso Refinery		
Company Name: Western Refining Company, L.P.		
II. Unit/Emission Point/Group/Process Information		
Revision No.:		
Unit/EPN/Group/Process ID No.: T-4270		
Applicable Form:		
III. Applicable Regulatory Requirement		
Name: 30 TAC Chapter 115		
SOP/GOP Index No.: R5112-3		
Pollutant: VOC		
Main Standard: 115.112(a)(1)		
IV. Title V Monitoring Information		
Monitoring Type: PM		
Unit Size:		
CAM/PM Option No.: PM-V-006		
Deviation Limit: 300 Btu/scf or greater for steam assisted flares		
CAM/PM Option No.:		
Deviation Limit:		
V. Control Device Information		
Control Device ID No.: 112		
Control Device Type: Flare		

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

Table 1b: CAM/PM Control Device Additions

Emission Unit ID No.	Control Device ID No.	Control Device Type
T-4270	112	Flare
T-4270	R-2911	Flare
T-4270	D-2914	Flare

**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: Western Refining Company, LLC
B.	Customer Reference Number (CN): CN601510191
C.	Submittal Date (mm/dd/yyyy): 04/08/2026
II. Site Information	
A.	Site Name: Western Refining El Paso All Sites
B.	Regulated Entity Reference Number (RN): RN100213016
C.	Indicate affected state(s) required to review permit application: <i>(Check the appropriate box[es].)</i>
☐ AR	☐ CO ☐ KS ☐ LA ☒ NM ☐ OK ☐ 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>
☒ VOC	☒ NO _x ☒ SO ₂ ☒ PM ₁₀ ☒ CO ☐ Pb ☒ HAPS
Other:	
E.	Is the site a non-major source subject to the Federal Operating Permit Program? ☐ Yes ☒ No
F.	Is the site within a local program area jurisdiction? ☒ Yes ☐ No
G.	Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? ☐ Yes ☒ 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>
☒ Site Operating Permit (SOP)	☐ Temporary Operating Permit (TOP) ☐ General Operating Permit (GOP)

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

IV. Initial Application Information <i>(Complete for Initial Issuance Applications Only.)</i>
A. Is this submittal an abbreviated or a full application? ☐ Abbreviated ☐ Full
B. If this is a full application, is the submittal a follow-up to an abbreviated application? ☐ Yes ☐ No
C. If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit? ☐ Yes ☐ 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.) ☐ Yes ☐ No
E. Has the required Public Involvement Plan been included with this application? ☐ Yes ☐ No
V. Confidential Information
A. Is confidential information submitted in conjunction with this application? ☐ Yes ☒ No
VI. Responsible Official (RO) Identifying Information
RO Name Prefix: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
RO Full Name: Leslie Davis
RO Title: VP Refining, El Paso Refinery
Employer Name: Western Refining Company, LLC
Mailing Address: 212 N. Clark Drive
City: El Paso
State: Texas
ZIP Code: 79905
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (915) 775-3454
Fax No.:
Email: lldavis@marathonpetroleum.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: (☐ Mr. ☐ Mrs. ☒ Ms. ☐ Dr.)
Technical Contact Full Name: Rebecca Ayala
Technical Contact Title: Advanced Environmental Engineer
Employer Name: Western Refining Company, LLC
Mailing Address: 212 N. Clark Drive
City: El Paso
State: Texas
ZIP Code: 79905
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (915) 526-6394
Fax No.:
Email: RAyala@marathonpetroleum.com
VIII. Reference Only Requirements <i>(For reference only.)</i>
A. State Senator: Senator César Blanco
B. State Representative: Representative Vincent Perez
C. Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? ☒ Yes ☐ No ☐ N/A
D. Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? ☒ Yes ☐ 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: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
Contact Full Name:
E. Telephone No.:
X. Application Area Information
A. Area Name: El Paso Refinery
B. Physical Address: 6501 Trowbridge Drive
City: El Paso
State: Texas
ZIP Code: 79905
C. Physical Location: 6501 Trowbridge Drive
D. Nearest City: El Paso
E. State: Texas
F. ZIP Code: 79905

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

X. Application Area Information (continued)
G. Latitude (nearest second): 31° 46' 03"
H. Longitude (nearest second): 106° 23' 43"
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? ☐ Yes ☒ No
J. Indicate the estimated number of emission units in the application area: 115
K. Are there any emission units in the application area subject to the Acid Rain Program? ☐ Yes ☒ No
L. Affected Source Plant Code (or ORIS/Facility Code):
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: TCEQ Region 6 (El Paso) Office
B. Physical Address: 401 E. Franklin Ave, Ste 560
City: El Paso
ZIP Code: 79901
C. Contact Person (Someone who will answer questions from the public during the public notice period):
Contact Name Prefix: (☐ Mr. ☐ Mrs. ☒ Ms. ☐ Dr.):
Contact Person Full Name: Rebecca Ayala
Contact Mailing Address: 212 N. Clark Dr.
City: El Paso
State: Texas
ZIP Code: 79905
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (915) 526-6394

**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 TCEQ or the Office of Attorney General on behalf of TCEQ are paid in accordance with the "Delinquent Fee and Penalty Protocol."

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

XIII. Designated Representative (DR) Identifying Information

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

DR Full Name:

DR Title:

Employer Name:

Mailing Address:

City:

State:

ZIP Code:

Territory:

Country:

Foreign Postal Code:

Internal Mail Code:

Telephone No.:

Fax No.:

Email:

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

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

XIV. Alternate Designated Representative (ADR) Identifying Information

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

ADR Full Name:

ADR Title:

Employer Name:

Mailing Address:

City:

State:

ZIP Code:

Territory:

Country:

Foreign Postal Code:

Internal Mail Code:

Telephone No.:

Fax No.:

Email:

Texas Commission on Environmental Quality

Title V Existing

1348

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	EL PASO REFINERY
Does the site have a physical address?	Yes
Physical Address	
Number and Street	6501 TROWBRIDGE DR
City	EL PASO
State	TX
ZIP	79905
County	EL PASO
Latitude (N) (##.#####)	31.7675
Longitude (W) (-###.#####)	106.395277
Primary SIC Code	2911
Secondary SIC Code	
Primary NAICS Code	324110
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN100213016
What is the name of the Regulated Entity (RE)?	MARATHON EL PASO REFINERY
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	6501 TROWBRIDGE DR
City	EL PASO
State	TX
ZIP	79905
County	EL PASO
Latitude (N) (##.#####)	31.7675
Longitude (W) (-###.#####)	-106.395277
Facility NAICS Code	
What is the primary business of this entity?	WHOLESALE

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN601510191
Type of Customer	Partnership
Full legal name of the applicant:	
Legal Name	Western Refining Company LLC
Texas SOS Filing Number	6826511
Federal Tax ID	133720439
State Franchise Tax ID	11337204397
State Sales Tax ID	

Local Tax ID	
DUNS Number	849237532
Number of Employees	251-500
Independently Owned and Operated?	No

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	WESTERN REFINING COMPANY LLC
Prefix	ME
First	LESLIE
Middle	
Last	DAVIS
Suffix	
Credentials	
Title	VP REFINING EL PASO REFINERY
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	212 N CLARK DR
Routing (such as Mail Code, Dept., or Attn:)	
City	EL PASO
State	TX
ZIP	79905
Phone (###-###-####)	9157753454
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	lldavis@marathonpetroleum.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	JOHN MOORE(MARATHON PETROL...)
Prefix	MARATHON PETROLEUM COMPANY LP
First	MR
Middle	JOHN
Last	MOORE
Suffix	
Credentials	
Title	ENVIRONMENTAL SAFETY & SECURITY MANAGER
Enter new address or copy one from list	
Mailing Address	
Address Type	Domestic

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

212 N CLARK DR

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

City

EL PASO

State

TX

Zip

79905

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

9157757864

Extension

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

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

E-mail

jmoore5@marathonpetroleum.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

REBECCA AYALA(WESTERN REFININ...)

Organization Name

WESTERN REFINING TERMINALS LLC

Prefix

MS

First

REBECCA

Middle

Last

AYALA

Suffix

Credentials

Title

ADVANCED ENVIRONMENTAL ENGINEER

Enter new address or copy one from list:

Mailing Address

Address Type

Domestic

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

212 N CLARK DR

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

City

EL PASO

State

TX

ZIP

79905

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

9155266394

Extension

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

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

E-mail

rayala@marathonpetroleum.com

Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

31 Deg 46 Min 3 Sec

3) Permit Longitude Coordinate:

106 Deg 23 Min 43 Sec

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

Update

4.1. Select the permit/project number for which this update should be applied.

1348-38512

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)

[File Properties]

File Name

OP_1_04.26 OP-1.pdf

Hash

357595D49A4A4D361E6C33DDF5F6C5306C4DFACEE27BCD5FA72D798B558AE861

MIME-Type

application/pdf

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

Attach OP-ACPS (Application Compliance Plan and Schedule)

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

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

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

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

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

Certification

I certify that I am the 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 John Moore, the owner of the STEERS account ER079050.
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 1348.
- 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: John Moore OWNER OPERATOR

Account Number:	ER079050
Signature IP Address:	165.225.216.181
Signature Date:	2026-04-08
Signature Hash:	5DDEFA8DD7FD02B16543388B0A50AE81AAA8330C4D1C419D35FC546B7038ACC4
Form Hash Code at time of Signature:	26B5ED6CA4BB7316699FBFF427F7A281609E2099DCE766A250F4E496A258BA6E

Submission

Reference Number:	The application reference number is 914701
Submitted by:	The application was submitted by ER079050/John Moore
Submitted Timestamp:	The application was submitted on 2026-04-08 at 12:58:28 CDT
Submitted From:	The application was submitted from IP address 165.225.216.181
Confirmation Number:	The confirmation number is 760858
Steers Version:	The STEERS version is 6.94
Permit Number:	The permit number is 1348

Additional Information

Application Creator: This account was created by Connor McBride

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

- 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	
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.	
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?	☒ YES ☐ NO
2. Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	☒ YES ☐ 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>	11
* 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. 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.	

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

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): TK-120, TK-138, TK-4114		
SOP Index No.: R115-T2b		
Pollutant: VOC		
Applicable Requirement		
Citation	Text Description	
30 TAC 116.111(a)(2)(J)	30 Texas Administrative Code Ch. 116: Control of Air Pollution by Permits for New Construction or Modification	
2. Compliance Status Assessment Method and Records Location		
Citation	Text Description	Location of Records/Documentation
30 TAC 116.111(a)(2)(J)	30 Texas Administrative Code Ch. 116: Control of Air Pollution by Permits for New Construction or Modification	Records of tank configurations, throughputs, and VOC emissions kept on site.
3. Non-compliance Situation Description		
During an internal audit, it was found that floating roof fittings for several storage tanks were misrepresented in the NSR permit that authorizes the tanks.		
4. Corrective Action Plan Description		
The facility will submit a permit application that will correct the misrepresented floating roof components.		
5. List of Activities/Milestones to Implement the Corrective Action Plan		
Submit a Permit Amendment Application under Texas Audit Privilege Act.		

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

Part 2 (continued)

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

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

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): CT-5301, CT-9100, CT-9101, CT-9102, P-14A, P-14B, P-14C, P-14D		
SOP Index No.: 63CC-CT1		
Pollutant: PM		
Applicable Requirement		
Citation	Text Description	
NSR Permit 18897 Special Condition 12B	Special Conditions for cooling towers.	
2. Compliance Status Assessment Method and Records Location		
Citation	Text Description	Location of Records/Documentation
NSR Permit 18897 Special Condition 12B	Special Conditions for cooling towers.	Repair and maintenance records to be kept on site.
3. Non-compliance Situation Description		
The site failed to perform cooling tower repairs listed in a 2022 inspection report.		
4. Corrective Action Plan Description		
Complete repairs listed in the report and develop a management system to track annual inspection of drift eliminators to ensure repair schedules are met.		
5. List of Activities/Milestones to Implement the Corrective Action Plan		

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

Part 2 (continued)

6. Previously Submitted Compliance Plan(s)	
Type of Action	Date Submitted
N/A	N/A
7. Progress Report Submission Schedule	
Target completion date: 11/08/2025	

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

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): Site Wide		
SOP Index No.: 63DDDDDD-H1		
Pollutant: HAPs		
Applicable Requirement		
Citation	Text Description	
40 CFR 63.7540 (a)(10)(i) through (vi)	Continuous compliance demonstrations for emissions standards of Subpart DDDDD.	
2. Compliance Status Assessment Method and Records Location		
Citation	Text Description	Location of Records/Documentation
40 CFR 63.7540 (a)(10)(i) through (vi)	Continuous compliance demonstrations for emissions standards of Subpart DDDDD.	Records maintained on site.
3. Non-compliance Situation Description		
Site has instances of flame instability during heater tuning.		
4. Corrective Action Plan Description		
Modify the tuning process to promote tuning in a regime that will produce good flame stability.		
5. List of Activities/Milestones to Implement the Corrective Action Plan		

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

Part 2 (continued)

6. Previously Submitted Compliance Plan(s)	
Type of Action	Date Submitted
N/A	N/A
7. Progress Report Submission Schedule	
Target Completion Date: 09/08/2025	

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

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): GRPHB3A		
SOP Index No.: 60Ja-H2		
Pollutant: NOx		
Applicable Requirement		
Citation	Text Description	
40 CFR 60.104a(i)	NSPS Ja emissions testing requirements.	
2. Compliance Status Assessment Method and Records Location		
Citation	Text Description	Location of Records/Documentation
40 CFR 60.104a(i)	NSPS Ja emissions testing requirements.	Records to be maintained on site.
3. Non-compliance Situation Description		
Initial performance testing for heaters was not conducted.		
4. Corrective Action Plan Description		
Complete initial performance testing.		
5. List of Activities/Milestones to Implement the Corrective Action Plan		

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

Part 2 (continued)

6. Previously Submitted Compliance Plan(s)	
Type of Action	Date Submitted
7. Progress Report Submission Schedule	
Testing to be completed by 11/08/2025.	

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

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): GRPHB3A		
SOP Index No.: 60Ja-H2		
Pollutant: SO2		
Applicable Requirement		
Citation	Text Description	
40 CFR 60.104a(i)	NSPS Ja emissions testing requirements.	
2. Compliance Status Assessment Method and Records Location		
Citation	Text Description	Location of Records/Documentation
40 CFR 60.104a(i)	NSPS Ja emissions testing requirements.	Records to be maintained on site.
3. Non-compliance Situation Description		
Initial performance testing for heaters was not conducted.		
4. Corrective Action Plan Description		
Complete initial performance testing.		
5. List of Activities/Milestones to Implement the Corrective Action Plan		

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

Part 2 (continued)

6. Previously Submitted Compliance Plan(s)

Type of Action	Date Submitted

7. Progress Report Submission Schedule

Testing to be completed by 11/08/2025.

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

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): GRPHB3A		
SOP Index No.: 60Ja-H2		
Pollutant: H2S		
Applicable Requirement		
Citation	Text Description	
40 CFR 60.104a(j)	NSPS Ja emissions testing requirements.	
2. Compliance Status Assessment Method and Records Location		
Citation	Text Description	Location of Records/Documentation
40 CFR 60.104a(j)	NSPS Ja emissions testing requirements.	Records to be maintained on site.
3. Non-compliance Situation Description		
Initial performance testing for heaters was not conducted.		
4. Corrective Action Plan Description		
Complete initial performance testing.		
5. List of Activities/Milestones to Implement the Corrective Action Plan		

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

Part 2 (continued)

6. Previously Submitted Compliance Plan(s)	
Type of Action	Date Submitted
7. Progress Report Submission Schedule	
Testing to be completed by 11/08/2025.	

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

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): 112, D-2914, R-2911		
SOP Index No.: 60Ja-M1		
Pollutant: VOC		
Applicable Requirement		
Citation	Text Description	
40 CFR 60.103a(a) (3)(vii)	NSPS Ja work practice and operational standards	
2. Compliance Status Assessment Method and Records Location		
Citation	Text Description	Location of Records/Documentation
40 CFR 60.103a(a) (3)(vii)	NSPS Ja work practice and operational standards	Records to be kept on site.
3. Non-compliance Situation Description		
Flare Monitoring Plan is missing a description of monitoring parameters used to quantify amount of flare gas recovered.		
4. Corrective Action Plan Description		
Include a description of the monitoring parameters in the Flare Management Plan.		
5. List of Activities/Milestones to Implement the Corrective Action Plan		

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

Part 2 (continued)

6. Previously Submitted Compliance Plan(s)	
Type of Action	Date Submitted
N/A	N/A
7. Progress Report Submission Schedule	
Target Completion Date: 08/08/2025.	

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

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): 112, D-2914, R-2911		
SOP Index No.: 63CC-1		
Pollutant: VOC		
Applicable Requirement		
Citation	Text Description	
40 CFR 63.670(e) and 40 CFR 63.670(l) (5)(ii)(B)	Requirements for Flare control devices	
2. Compliance Status Assessment Method and Records Location		
Citation	Text Description	Location of Records/Documentation
40 CFR 63.670(e) and 40 CFR 63.670(l) (5)(ii)(B)	Requirements for Flare control devices	Records maintained on site.
3. Non-compliance Situation Description		
Vent gas net heating value is being calculated to a multiple of four.		
4. Corrective Action Plan Description		
Resolve and update the data compression setting causing the net heating value to be reported in multiples of four.		
5. List of Activities/Milestones to Implement the Corrective Action Plan		

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

Part 2 (continued)

6. Previously Submitted Compliance Plan(s)	
Type of Action	Date Submitted
N/A	N/A
7. Progress Report Submission Schedule	
Target completion date: 09/08/2025.	

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

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): 112, D-2914, R-2911		
SOP Index No.: 60A-1		
Pollutant: VOC		
Applicable Requirement		
Citation	Text Description	
40 CFR 60.13(h)(2)(iii) (A)	NSPS A General Monitoring Requirements	
2. Compliance Status Assessment Method and Records Location		
Citation	Text Description	Location of Records/Documentation
40 CFR 60.13(h)(2)(iii) (A)	NSPS A General Monitoring Requirements	Records maintained on site.
3. Non-compliance Situation Description		
Failure to include low-range H2S and BTU analyzer downtime on the flare system in periodic reports		
4. Corrective Action Plan Description		
Update procedures/processes to report downtime on low-range H2S and BTU analyzer on the flare system		
5. List of Activities/Milestones to Implement the Corrective Action Plan		

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

Part 2 (continued)

6. Previously Submitted Compliance Plan(s)	
Type of Action	Date Submitted
N/A	N/A
7. Progress Report Submission Schedule	
Target completion date: 07/30/2025.	

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

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): H-8902, H-8903		
SOP Index No.: 60Ja-H2		
Pollutant: VOC		
Applicable Requirement		
Citation	Text Description	
40 CFR 60.107a(c)/(d)	NSPS Ja NOx monitoring requirements.	
2. Compliance Status Assessment Method and Records Location		
Citation	Text Description	Location of Records/Documentation
40 CFR 60.107a(c)/(d)	NSPS Ja NOx monitoring requirements.	Records maintained on site.
3. Non-compliance Situation Description		
Failure to monitor NOx emissions for sources H-8902 and H-8903 as prescribed by NSPS Ja.		
4. Corrective Action Plan Description		
Begin monitoring NOx emissions as prescribed in 60.107a(c)(6) and provide the applicable notifications to the Administrator		
5. List of Activities/Milestones to Implement the Corrective Action Plan		

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

Part 2 (continued)

6. Previously Submitted Compliance Plan(s)	
Type of Action	Date Submitted
N/A	N/A
7. Progress Report Submission Schedule	
Target completion date: 11/08/2025.	

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

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): 111		
SOP Index No.: 63UUUM1		
Pollutant: HAPs		
Applicable Requirement		
Citation	Text Description	
40 CFR Part 63.1560	Testing requirements for Catalytic Cracking Units.	
2. Compliance Status Assessment Method and Records Location		
Citation	Text Description	Location of Records/Documentation
40 CFR Part 63.1560	Testing requirements for Catalytic Cracking Units.	Records to be kept on site.
3. Non-compliance Situation Description		
Failed to conduct a stack test every 5 years as per AMP approval letter to verify that the established values for Minimum Liquid-to-Gas Ratio and Minimum pressure drop across the WGS are still representative of facility operations and WGS performance or to determine new representative values.		
4. Corrective Action Plan Description		
Conduct a stack test and develop protocols to ensure repeat testing requirements are met.		
5. List of Activities/Milestones to Implement the Corrective Action Plan		
Test is scheduled for 4 th quarter of 2025.		

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

Part 2 (continued)

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



Western Refining Company LLC

A subsidiary of Marathon Petroleum Corporation

6501 Trowbridge Drive

El Paso, TX 79905

Tel: 915-775-3454

ELECTRONIC DELIVERY VIA STEERS

July 8, 2025

Air Permits Initial Review Team
Texas Commission on Environmental Quality
MC161, 12100 Park 35 Circle, Building C, Third Floor
Austin, Texas 78753

***Re: Title V Site Operating Permit Renewal Application
Western Refining Company, LLC – El Paso Refinery
TCEQ Account No. EE-0015-H
TCEQ Customer Number (CN) CN601510191
TCEQ Regulated Entity Number (RN) RN100213016***

To Whom It May Concern:

Western Refining Company, LLC (Western) owns and operates a refinery, wastewater treatment plant, and associated storage tanks located at the El Paso Refinery in El Paso, Texas. Western complies with Title V requirements by using SOP O-1348 to authorize operation of the refinery portion of the facility. SOP O-1348 is set to expire on January 12, 2026, and a renewal application is required to be submitted by July 12, 2025.

Western submits the enclosed renewal application for a Title V Site Operating Permit to operate the facilities located within the refinery portion of their El Paso Refinery. The application fee will be submitted electronically via the State of Texas Environmental Electronic Reporting System (STEERS).

If you have any questions about this application, please contact Ms. Rebecca Ayala of my staff at (915) 526-6394.

Sincerely

Joe Mendoza, P.E.
Environmental Supervisor



Renewal Application

30 TAC §122

Refinery Title V Authorization

Western Refining Company, LLC

El Paso, Texas

Prepared by:

Ashworth Leininger Group
2219 Sawdust Road, Suite 1604
Spring, Texas 77380

July 2025

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- Figure 2: Plot Plan
- Figure 3: Process Flow Diagrams

Attachments

- Attachment 1: OP-1 Form
- Attachment 2: OP-2 Form
- Attachment 3: OP-ACPS Form
- Attachment 4: OP-CRO1, OP-CRO2 Forms
- Attachment 5: OP-REQ1 Form
- Attachment 6: OP-REQ2 Form
- Attachment 7: OP-UA Forms
- Attachment 8: OP-REQ3 Form
- Attachment 9: OP-SUMR Form
- Attachment 10: OP-PBRSUP Form
- Attachment 11: Approved Alternative Requirements

Section 1 Introduction

Western Refining Company, LLC (WRC), and Western Refining Terminals, LLC (WRT), collectively known as Western, own and operate an integrated petroleum refinery in El Paso, Texas (El Paso Refinery). The El Paso Refinery is located at 6501 Trowbridge Drive and is TCEQ Regulated Entity Reference RN100213016. An area map is provided as Figure 1.

The El Paso Refinery operates under TCEQ Air Quality Account EE-0015-H and TCEQ Customer Reference Numbers CN601510191 (Refining) and CN604485763 (Terminals). Emission sources at the El Paso Refinery are authorized under various mechanisms, including TCEQ New Source Review Permits 18897 (Refining) and 93546 (Terminals). The El Paso Refinery is an existing major source under the Prevention of Significant Deterioration (PSD) and Title V programs. The refinery portion of the site is authorized by the Title V program via SOP O-1348 and the terminal portion of the site is authorized via SOP O-4603.

Western complies with Title V requirements by using SOP O-1348 to authorize operation of the refinery portion of the facility. SOP O-1348 is set to expire on January 12, 2026, and a renewal application is required to be submitted by July 12, 2025. Western submits the enclosed renewal application for a Title V Site Operating Permit to operate the facilities located within the refinery portion of their El Paso Refinery.

Details of the application can be found in Section 3 of this notification.

This application is being prepared in accordance with 30 TAC §122. This application includes all applicable forms for submittal (see Attachments).

Section 2 Process Description

SOP O-1348 authorizes the operation of the sources associated with the refinery portion of the El Paso Refinery, which includes emissions units in the North Plant and South Plant. The North and South Plants include crude distillation units, naphtha fractionating units, hydrotreating and reheniforming units, a fluid catalytic cracking unit (FCCU), alkylation units, light ends recovery units, a hydrogen plant, and associated combustion and utilities. The units are designed to process crude oils to produce a variety of petroleum products, such as liquefied petroleum gas (LPG), butane, gasoline, diesel, jet fuel, fuel oil, and other heavy products such as carbon black oil and asphalt.

A plot plan showing emission points is included as Figure 2, and a process flow diagram is included as Figure 3.

Section 3 Project Description

Western complies with Title V requirements by using SOP O-1348 to authorize operation of the refinery portion of the facility. SOP O-1348 is set to expire on January 12, 2026, and a renewal application is required to be submitted by July 12, 2025. Western is humbly submitting the enclosed renewal application for a Title V Site Operating Permit to operate the facilities located within the

refinery portion of their El Paso Refinery. Along with the required SOP renewal forms, Western requests an SOP revision to include the following modifications:

- Addition of a diesel engine-driven emergency use fire pump (FIREP-4).
- Correction of Boiler F-1013 fuel type to natural gas. The fuel is a mixture of refinery fuel gas and natural gas.
- Switch inspection requirements for domed EFR tank (T-4114) to comply with IFR tank inspection requirements.
- Correction to include existing Tank 120 in the Refinery Title V permit that was inadvertently omitted during previous renewal.

The required SOP administrative and technical application forms are included in the attachments below. SOP requested revisions are summarized in Form OP-2.

Figure 1
Area Map

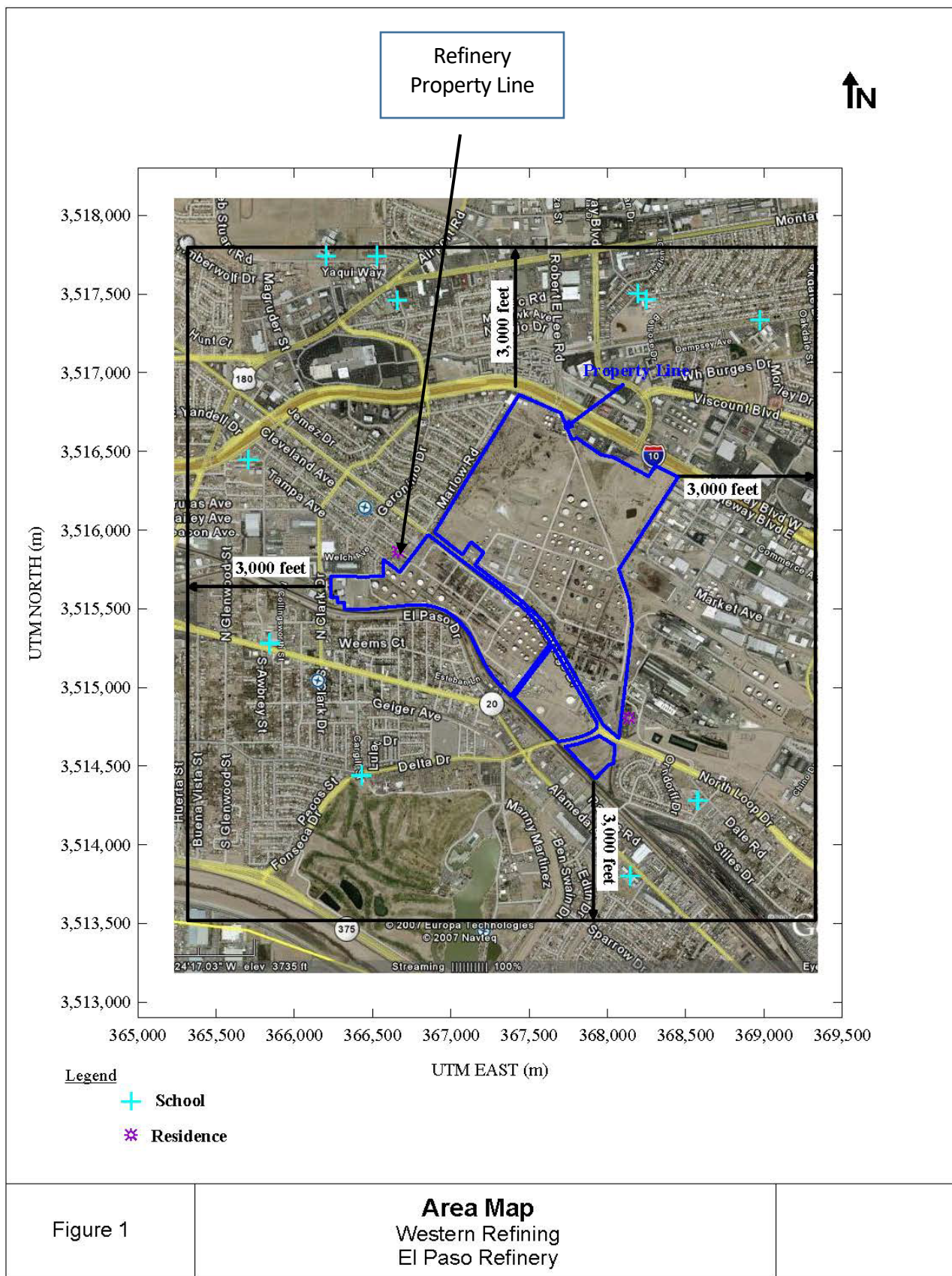


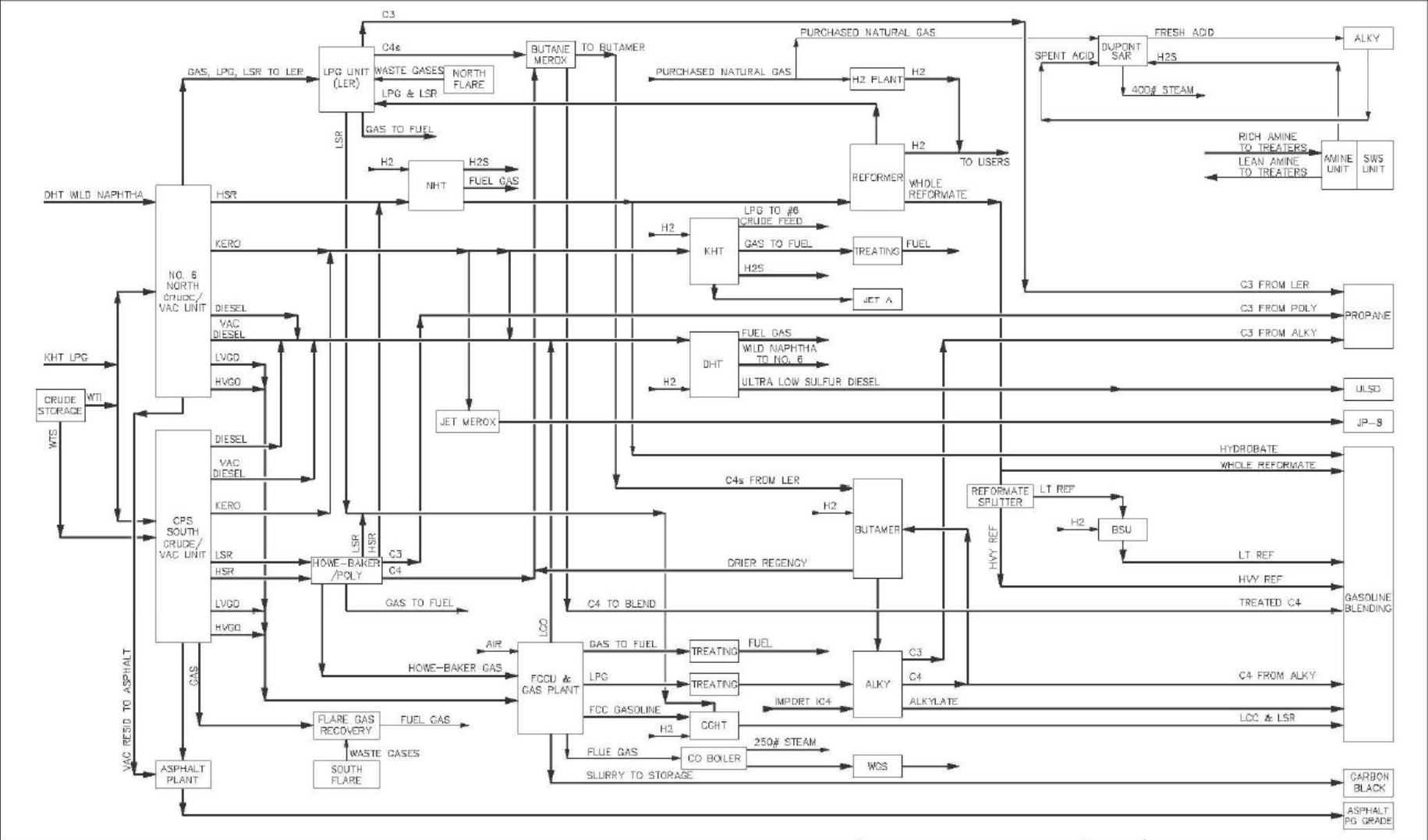
Figure 2

Plot Plan

Figure 3

Process Flow Diagram

Refinery Process Flow Diagram



Refinery Process Flow Diagram



Figure 3

Attachment 1

OP-1 Form

**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: Western Refining Company, LLC
B. Customer Reference Number (CN): CN601510191
C. Submittal Date (mm/dd/yyyy): 07/08/2025
II. Site Information
A. Site Name: El Paso Refinery
B. Regulated Entity Reference Number (RN): RN100213016
C. Indicate affected state(s) required to review permit application: <i>(Check the appropriate box[es].)</i>
☐ AR ☐ CO ☐ KS ☐ LA ☒ NM ☐ OK ☐ 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>
☒ VOC ☒ NO _x ☒ SO ₂ ☒ PM ₁₀ ☒ CO ☐ Pb ☒ HAPS
Other:
E. Is the site a non-major source subject to the Federal Operating Permit Program? ☐ Yes ☒ No
F. Is the site within a local program area jurisdiction? ☒ Yes ☐ No
G. Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? ☐ Yes ☒ 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>
☒ Site Operating Permit (SOP) ☐ Temporary Operating Permit (TOP) ☐ General Operating Permit (GOP)

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

IV. Initial Application Information <i>(Complete for Initial Issuance Applications Only.)</i>
A. Is this submittal an abbreviated or a full application? ☐ Abbreviated ☐ Full
B. If this is a full application, is the submittal a follow-up to an abbreviated application? ☐ Yes ☐ No
C. If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit? ☐ Yes ☐ 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.) ☐ Yes ☐ No
E. Has the required Public Involvement Plan been included with this application? ☐ Yes ☐ No
V. Confidential Information
A. Is confidential information submitted in conjunction with this application? ☐ Yes ☒ No
VI. Responsible Official (RO) Identifying Information
RO Name Prefix: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
RO Full Name: Leslie Davis
RO Title: VP Refining, El Paso Refinery
Employer Name: Western Refining Company, LLC
Mailing Address: 212 N. Clark Drive
City: El Paso
State: Texas
ZIP Code: 79905
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (915) 775-3454
Fax No.:
Email: lldavis@marathonpetroleum.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: (☐ Mr. ☐ Mrs. ☒ Ms. ☐ Dr.)
Technical Contact Full Name: Rebecca Ayala
Technical Contact Title: Advanced Environmental Engineer
Employer Name: Western Refining Company, LLC
Mailing Address: 212 N. Clark Drive
City: El Paso
State: Texas
ZIP Code: 79905
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (915) 526-6394
Fax No.:
Email: RAyala@marathonpetroleum.com
VIII. Reference Only Requirements <i>(For reference only.)</i>
A. State Senator: Senator César Blanco
B. State Representative: Representative Vincent Perez
C. Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? ☒ Yes ☐ No ☐ N/A
D. Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? ☒ Yes ☐ 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: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
Contact Full Name:
E. Telephone No.:
X. Application Area Information
A. Area Name: El Paso Refinery
B. Physical Address: 6501 Trowbridge Drive
City: El Paso
State: Texas
ZIP Code: 79905
C. Physical Location: 6501 Trowbridge Drive
D. Nearest City: El Paso
E. State: Texas
F. ZIP Code: 79905

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

X. Application Area Information (continued)
G. Latitude (nearest second): 31° 46' 03"
H. Longitude (nearest second): 106° 23' 43"
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? ☐ Yes ☒ No
J. Indicate the estimated number of emission units in the application area: 115
K. Are there any emission units in the application area subject to the Acid Rain Program? ☐ Yes ☒ No
L. Affected Source Plant Code (or ORIS/Facility Code):
XI. Public Notice <i>(Complete this section for SOP Applications and Acid Rain Permit Applications only.)</i>
A. Name of a public place to view application and draft permit: TCEQ Region 6 (El Paso) Office
B. Physical Address: 401 E. Franklin Ave, Ste 560
City: El Paso
ZIP Code: 79901
C. Contact Person (Someone who will answer questions from the public during the public notice period):
Contact Name Prefix: (☐ Mr. ☐ Mrs. ☒ Ms. ☐ Dr.):
Contact Person Full Name: Rebecca Ayala
Contact Mailing Address: 212 N. Clark Dr.
City: El Paso
State: Texas
ZIP Code: 79905
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (915) 526-6394

**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 TCEQ or the Office of Attorney General on behalf of TCEQ are paid in accordance with the "Delinquent Fee and Penalty Protocol."

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

XIII. Designated Representative (DR) Identifying Information

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

DR Full Name:

DR Title:

Employer Name:

Mailing Address:

City:

State:

ZIP Code:

Territory:

Country:

Foreign Postal Code:

Internal Mail Code:

Telephone No.:

Fax No.:

Email:

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

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

XIV. Alternate Designated Representative (ADR) Identifying Information

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

ADR Full Name:

ADR Title:

Employer Name:

Mailing Address:

City:

State:

ZIP Code:

Territory:

Country:

Foreign Postal Code:

Internal Mail Code:

Telephone No.:

Fax No.:

Email:

Attachment 2

OP-2 Form

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

Date: 07/08/2025	
Permit No.: O-1348	
Regulated Entity No.: RN100213016	
Company Name: Western Refining Company, LLC	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? ☒ YES ☐ NO	
I. Application Type	
Indicate the type of application:	
☒ Renewal	
☐ Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
☒ Significant Revision	
☐ Revision Requesting Prior Approval	
☐ Administrative Revision	
☐ Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only ☒ YES ☐ NO	
For GOP Revisions Only ☐ YES ☐ NO	

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

III. Major Source 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: 07/08/2025
Permit No.: O-1348
Regulated Entity No.: RN100213016
Company Name: Western Refining Company, LLC

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	FIREP-4	OP-UA2	103466	Authorize a new diesel engine-driven emergency use fire water pump under 106.511.
2	MS-C	No	F-1013	OP-UA6	18897	Correction that the Boiler F-1013 fuel type is natural gas fired.
3	SIG-A	No	T-4114	OP-UA3	18897	Correction of inspection requirements for domed EFR tanks to comply with IFR tank requirements.
4	SIG-E	No	T-120	OP-UA3	18897	Correction to include existing tank 120 in the Refinery Title V permit that was inadvertently omitted during previous renewal.

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

Date: 07/08/2025	
Permit No.: O-1348	
Regulated Entity No.: RN100213016	
Company Name: Western Refining Company, LLC	
I. Significant Revision <i>(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)</i>	
A. Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322?	☒ YES ☐ NO
B. Indicate the alternate language(s) in which public notice is required: Spanish	
C. Will, there be a change in air pollutant emissions as a result of the significant revision?	☐ YES ☒ NO

Attachment 3

OP-ACPS Form

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

- 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	
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.	
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?	☒ YES ☐ NO
2. Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	☒ YES ☐ 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>	11
* 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. 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.	

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

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): TK-120, TK-138, TK-4114		
SOP Index No.: R115-T2b		
Pollutant: VOC		
Applicable Requirement		
Citation	Text Description	
30 TAC 116.111(a)(2)(J)	30 Texas Administrative Code Ch. 116: Control of Air Pollution by Permits for New Construction or Modification	
2. Compliance Status Assessment Method and Records Location		
Citation	Text Description	Location of Records/Documentation
30 TAC 116.111(a)(2)(J)	30 Texas Administrative Code Ch. 116: Control of Air Pollution by Permits for New Construction or Modification	Records of tank configurations, throughputs, and VOC emissions kept on site.
3. Non-compliance Situation Description		
During an internal audit, it was found that floating roof fittings for several storage tanks were misrepresented in the NSR permit that authorizes the tanks.		
4. Corrective Action Plan Description		
The facility will submit a permit application that will correct the misrepresented floating roof components.		
5. List of Activities/Milestones to Implement the Corrective Action Plan		
Submit a Permit Amendment Application under Texas Audit Privilege Act.		

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

Part 2 (continued)

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

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

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): CT-5301, CT-9100, CT-9101, CT-9102, P-14A, P-14B, P-14C, P-14D		
SOP Index No.: 63CC-CT1		
Pollutant: PM		
Applicable Requirement		
Citation	Text Description	
NSR Permit 18897 Special Condition 12B	Special Conditions for cooling towers.	
2. Compliance Status Assessment Method and Records Location		
Citation	Text Description	Location of Records/Documentation
NSR Permit 18897 Special Condition 12B	Special Conditions for cooling towers.	Repair and maintenance records to be kept on site.
3. Non-compliance Situation Description		
The site failed to perform cooling tower repairs listed in a 2022 inspection report.		
4. Corrective Action Plan Description		
Complete repairs listed in the report and develop a management system to track annual inspection of drift eliminators to ensure repair schedules are met.		
5. List of Activities/Milestones to Implement the Corrective Action Plan		

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

Part 2 (continued)

6. Previously Submitted Compliance Plan(s)	
Type of Action	Date Submitted
N/A	N/A
7. Progress Report Submission Schedule	
Target completion date: 11/08/2025	

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

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): Site Wide		
SOP Index No.: 63DDDDDD-H1		
Pollutant: HAPs		
Applicable Requirement		
Citation	Text Description	
40 CFR 63.7540 (a)(10)(i) through (vi)	Continuous compliance demonstrations for emissions standards of Subpart DDDDD.	
2. Compliance Status Assessment Method and Records Location		
Citation	Text Description	Location of Records/Documentation
40 CFR 63.7540 (a)(10)(i) through (vi)	Continuous compliance demonstrations for emissions standards of Subpart DDDDD.	Records maintained on site.
3. Non-compliance Situation Description		
Site has instances of flame instability during heater tuning.		
4. Corrective Action Plan Description		
Modify the tuning process to promote tuning in a regime that will produce good flame stability.		
5. List of Activities/Milestones to Implement the Corrective Action Plan		

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

Part 2 (continued)

6. Previously Submitted Compliance Plan(s)	
Type of Action	Date Submitted
N/A	N/A
7. Progress Report Submission Schedule	
Target Completion Date: 09/08/2025	

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

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): GRPHB3A		
SOP Index No.: 60Ja-H2		
Pollutant: NOx		
Applicable Requirement		
Citation	Text Description	
40 CFR 60.104a(i)	NSPS Ja emissions testing requirements.	
2. Compliance Status Assessment Method and Records Location		
Citation	Text Description	Location of Records/Documentation
40 CFR 60.104a(i)	NSPS Ja emissions testing requirements.	Records to be maintained on site.
3. Non-compliance Situation Description		
Initial performance testing for heaters was not conducted.		
4. Corrective Action Plan Description		
Complete initial performance testing.		
5. List of Activities/Milestones to Implement the Corrective Action Plan		

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

Part 2 (continued)

6. Previously Submitted Compliance Plan(s)

Type of Action	Date Submitted

7. Progress Report Submission Schedule

Testing to be completed by 11/08/2025.

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

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): GRPHB3A		
SOP Index No.: 60Ja-H2		
Pollutant: SO2		
Applicable Requirement		
Citation	Text Description	
40 CFR 60.104a(i)	NSPS Ja emissions testing requirements.	
2. Compliance Status Assessment Method and Records Location		
Citation	Text Description	Location of Records/Documentation
40 CFR 60.104a(i)	NSPS Ja emissions testing requirements.	Records to be maintained on site.
3. Non-compliance Situation Description		
Initial performance testing for heaters was not conducted.		
4. Corrective Action Plan Description		
Complete initial performance testing.		
5. List of Activities/Milestones to Implement the Corrective Action Plan		

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

Part 2 (continued)

6. Previously Submitted Compliance Plan(s)	
Type of Action	Date Submitted
7. Progress Report Submission Schedule	
Testing to be completed by 11/08/2025.	

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

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): GRPHB3A		
SOP Index No.: 60Ja-H2		
Pollutant: H2S		
Applicable Requirement		
Citation	Text Description	
40 CFR 60.104a(j)	NSPS Ja emissions testing requirements.	
2. Compliance Status Assessment Method and Records Location		
Citation	Text Description	Location of Records/Documentation
40 CFR 60.104a(j)	NSPS Ja emissions testing requirements.	Records to be maintained on site.
3. Non-compliance Situation Description		
Initial performance testing for heaters was not conducted.		
4. Corrective Action Plan Description		
Complete initial performance testing.		
5. List of Activities/Milestones to Implement the Corrective Action Plan		

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

Part 2 (continued)

6. Previously Submitted Compliance Plan(s)	
Type of Action	Date Submitted
7. Progress Report Submission Schedule	
Testing to be completed by 11/08/2025.	

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

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): 112, D-2914, R-2911		
SOP Index No.: 60Ja-M1		
Pollutant: VOC		
Applicable Requirement		
Citation	Text Description	
40 CFR 60.103a(a) (3)(vii)	NSPS Ja work practice and operational standards	
2. Compliance Status Assessment Method and Records Location		
Citation	Text Description	Location of Records/Documentation
40 CFR 60.103a(a) (3)(vii)	NSPS Ja work practice and operational standards	Records to be kept on site.
3. Non-compliance Situation Description		
Flare Monitoring Plan is missing a description of monitoring parameters used to quantify amount of flare gas recovered.		
4. Corrective Action Plan Description		
Include a description of the monitoring parameters in the Flare Management Plan.		
5. List of Activities/Milestones to Implement the Corrective Action Plan		

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

Part 2 (continued)

6. Previously Submitted Compliance Plan(s)	
Type of Action	Date Submitted
N/A	N/A
7. Progress Report Submission Schedule	
Target Completion Date: 08/08/2025.	

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

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): 112, D-2914, R-2911		
SOP Index No.: 63CC-1		
Pollutant: VOC		
Applicable Requirement		
Citation	Text Description	
40 CFR 63.670(e) and 40 CFR 63.670(l) (5)(ii)(B)	Requirements for Flare control devices	
2. Compliance Status Assessment Method and Records Location		
Citation	Text Description	Location of Records/Documentation
40 CFR 63.670(e) and 40 CFR 63.670(l) (5)(ii)(B)	Requirements for Flare control devices	Records maintained on site.
3. Non-compliance Situation Description		
Vent gas net heating value is being calculated to a multiple of four.		
4. Corrective Action Plan Description		
Resolve and update the data compression setting causing the net heating value to be reported in multiples of four.		
5. List of Activities/Milestones to Implement the Corrective Action Plan		

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

Part 2 (continued)

6. Previously Submitted Compliance Plan(s)	
Type of Action	Date Submitted
N/A	N/A
7. Progress Report Submission Schedule	
Target completion date: 09/08/2025.	

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

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): 112, D-2914, R-2911		
SOP Index No.: 60A-1		
Pollutant: VOC		
Applicable Requirement		
Citation	Text Description	
40 CFR 60.13(h)(2)(iii) (A)	NSPS A General Monitoring Requirements	
2. Compliance Status Assessment Method and Records Location		
Citation	Text Description	Location of Records/Documentation
40 CFR 60.13(h)(2)(iii) (A)	NSPS A General Monitoring Requirements	Records maintained on site.
3. Non-compliance Situation Description		
Failure to include low-range H2S and BTU analyzer downtime on the flare system in periodic reports		
4. Corrective Action Plan Description		
Update procedures/processes to report downtime on low-range H2S and BTU analyzer on the flare system		
5. List of Activities/Milestones to Implement the Corrective Action Plan		

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

Part 2 (continued)

6. Previously Submitted Compliance Plan(s)	
Type of Action	Date Submitted
N/A	N/A
7. Progress Report Submission Schedule	
Target completion date: 07/30/2025.	

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

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): H-8902, H-8903		
SOP Index No.: 60Ja-H2		
Pollutant: VOC		
Applicable Requirement		
Citation	Text Description	
40 CFR 60.107a(c)/(d)	NSPS Ja NOx monitoring requirements.	
2. Compliance Status Assessment Method and Records Location		
Citation	Text Description	Location of Records/Documentation
40 CFR 60.107a(c)/(d)	NSPS Ja NOx monitoring requirements.	Records maintained on site.
3. Non-compliance Situation Description		
Failure to monitor NOx emissions for sources H-8902 and H-8903 as prescribed by NSPS Ja.		
4. Corrective Action Plan Description		
Begin monitoring NOx emissions as prescribed in 60.107a(c)(6) and provide the applicable notifications to the Administrator		
5. List of Activities/Milestones to Implement the Corrective Action Plan		

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

Part 2 (continued)

6. Previously Submitted Compliance Plan(s)	
Type of Action	Date Submitted
N/A	N/A
7. Progress Report Submission Schedule	
Target completion date: 11/08/2025.	

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

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): 111		
SOP Index No.: 63UUUM1		
Pollutant: HAPs		
Applicable Requirement		
Citation	Text Description	
40 CFR Part 63.1560	Testing requirements for Catalytic Cracking Units.	
2. Compliance Status Assessment Method and Records Location		
Citation	Text Description	Location of Records/Documentation
40 CFR Part 63.1560	Testing requirements for Catalytic Cracking Units.	Records to be kept on site.
3. Non-compliance Situation Description		
Failed to conduct a stack test every 5 years as per AMP approval letter to verify that the established values for Minimum Liquid-to-Gas Ratio and Minimum pressure drop across the WGS are still representative of facility operations and WGS performance or to determine new representative values.		
4. Corrective Action Plan Description		
Conduct a stack test and develop protocols to ensure repeat testing requirements are met.		
5. List of Activities/Milestones to Implement the Corrective Action Plan		
Test is scheduled for 4 th quarter of 2025.		

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

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC		Area Name: El Paso Refinery

Part 2 (continued)

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

Attachment 4

OP-CRO1 & OP-CRO2 Forms

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: RN100213016
CN: CN601510191
Account No.: EE-0015-H
Permit No.: O-1348
Project No.:
Area Name: El Paso Refinery
Company Name: Western Refining Company, LLC
II. Certification Type <i>(Please mark appropriate box)</i>
☐ Responsible Official Representative ☒ Duly Authorized Representative
III. Submittal Type <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>
☐ SOP/TOP Initial Permit Application ☒ Permit Revision, Renewal, or Reopening
☐ GOP Initial Permit Application ☐ Update to Permit Application
☐ Other: _____

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

IV. Certification of Truth

I, John Moore certify that I am the DAR
(Certifier Name printed or typed) (RO or DAR)

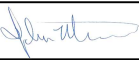
am authorized to make this submission on behalf of the owners and operators of the source or units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment. The above certification is for the statements and information dated during the time period or on the specific date(s) below:

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

Time Period: From _____ to _____
(Start Date) (End Date)

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

(Date 5) (Date 6)

Signature:  Signature Date: Jul 3, 2025

Title: Refining Environmental, Safety & Security Director

Form OP-CRO2
Change of Responsible Official Information
Federal Operating Permit Program

The Texas Commission on Environmental Quality (TCEQ) shall be notified of a new appointment or administrative information change (e.g., address, phone number, title) for a Responsible Official (RO), Designated Representative (DR), or Alternate Designated Representative (ADR) in the next submittal. This form satisfies the requirements for notification (a revised Certificate of Representation must also be submitted to the U.S. Environmental Protection agency for changes in the DR and ADR). After the initial submittal, if there is a change of Duly Authorized Representative (DAR) appointment or administrative information changes for the DAR, include a revised Form OP-DEL (Delegation of Responsible Official) with the next submittal to TCEQ.

I. Identifying Information
Account No.: EE-0015-H
Regulated Entity Number: RN RN100213016
Customer Reference Number: CN CN601510191
Permit Number: O1348
Area Name: Marathon El Paso Refinery
Company: Western Refining Company, LLC
II. Change Type
Action Type: ☒ New Appointment ☐ Administrative Information Change
Contact Type (only one response accepted per form): ☒ Responsible Official ☐ Designated Representative (<i>Acid Rain Program and/or CSAPR sources only</i>) ☐ Alternate Designated Representative (<i>Acid Rain Program and/or CSAPR sources only</i>)

Form OP-CRO2
Change of Responsible Official Information
Federal Operating Permit Program

III. Responsible Official/Designated Representative/Alternate Designated Representative Information
Conventional Title: ☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.
Name (Driver's License/STEERS): Leslie Davis
Title: VP Refining, El Paso Refinery
Appointment Effective Date: 07/02/25
Telephone Number: 915-775-3454
Fax Number.:
Company Name: Western Refining Company, LLC
Mailing Address: 212 N. Clark Drive
City: El Paso
State: TX
ZIP Code: 79905
Email Address: lldavis@marathonpetroleum.com

Form OP-CRO2
Change of Responsible Official Information
Federal Operating Permit Program

IV. Certification of Truth, Accuracy, and Completeness

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

I, Leslie Davis, certify that based on information and belief formed Reasonable inquiry, the statement and information stated above are true, accurate, and complete.

Signature: Leslie Davis

 Digitally signed by Leslie Davis
Date: 2025.07.08 10:41:01 -06'00'

Signature Date: _____

**Change of Responsible Official
Federal Operating Permit Program
(Extension)**

V. Additional Identifying Information
Account No.: EE-0015-H
Regulated Entity Number: RN100213016
Customer Reference Number: CN604485763
Permit Number: O4603
Area Name: Marathon El Paso Refinery
Account Number:
Regulated Entity Number: RN
Customer Reference Number: CN
Permit Number:
Area Name:
Account Number:
Regulated Entity Number: RN
Customer Reference Number: CN
Permit No.:
Area Name:
Account Number:
Regulated Entity Number: RN
Customer Reference Number: CN
Permit Number:
Area Name:
Account Number:
Regulated Entity Number: RN
Customer Reference Number: CN
Permit Number:
Area Name:

Attachment 5

OP-REQ1 Form

Application Area-Wide Applicability Determinations and General Information

Form OP-REQ1 (Page 1)

Federal Operating Permit Program

Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
07/08/2025	O-1348	RN100213016

For SOP applications, answer ALL questions unless otherwise directed.

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

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

Application Area-Wide Applicability Determinations and General Information

Form OP-REQ1 (Page 2)

Federal Operating Permit Program Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
07/08/2025	O-1348	RN100213016

For SOP applications, answer ALL questions unless otherwise directed.

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

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

Application Area-Wide Applicability Determinations and General Information

Form OP-REQ1 (Page 3)

Federal Operating Permit Program Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
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For SOP applications, answer ALL questions unless otherwise directed.

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

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

Application Area-Wide Applicability Determinations and General Information

Form OP-REQ1 (Page 4)

Federal Operating Permit Program Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
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For SOP applications, answer ALL questions unless otherwise directed.

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

I. Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter (continued)		
E. Outdoor Burning (continued)		
◆ 5.	Prescribed burning is used in the application area and subject to the exception provided in 30 TAC § 111.211.	☐ Yes ☒ No
◆ 6.	Hydrocarbon burning is used in the application area and subject to the exception provided in 30 TAC § 111.213.	☒ Yes ☐ No
◆ 7.	The application area has received the TCEQ Executive Director approval of otherwise prohibited outdoor burning according to 30 TAC § 111.215.	☒ Yes ☐ No
II. Title 30 TAC Chapter 112 - Control of Air Pollution from Sulfur Compounds		
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.	☐ Yes ☒ 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>	☒ Yes ☐ 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.	☒ Yes ☐ No

Application Area-Wide Applicability Determinations and General Information

Form OP-REQ1 (Page 5)

Federal Operating Permit Program Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
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For SOP applications, answer ALL questions unless otherwise directed.

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

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

Application Area-Wide Applicability Determinations and General Information

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For SOP applications, answer ALL questions unless otherwise directed.

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

III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)		
D. Loading and Unloading of VOCs (continued)		
◆ 3.	Transfer operations at motor vehicle fuel dispensing facilities are the only VOC transfer operations conducted in the application area.	☐ Yes ☒ No
E. Filling of Gasoline Storage Vessels (Stage I) for Motor Vehicle Fuel Dispensing Facilities		
◆ 1.	The application area includes one or more motor vehicle fuel dispensing facilities and gasoline is transferred from a tank-truck tank into a stationary storage container. <i>If the response to Question III.E.1 is "No," go to Section III.F.</i>	☒ YES ☐ No
◆ 2.	Transfers to stationary storage containers used exclusively for the fueling of agricultural implements are the only transfer operations conducted at facilities in the application area.	☐ YES ☒ No
◆ 3.	All transfers at facilities in the application area are made into stationary storage containers with internal floating roofs, external floating roofs, or their equivalent. <i>If the response to Question III.E.2 and/or E.3 is "Yes," go to Section III.F.</i>	☐ Yes ☒ 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>	☐ Yes ☒ No
◆ 5.	Stationary gasoline storage containers with a nominal capacity less than or equal to 1,000 gallons are located at the facility.	☐ Yes ☐ No
◆ 6.	Stationary gasoline storage containers with a nominal capacity greater than 1,000 gallons are located at the facility.	☐ Yes ☐ No
◆ 7.	At facilities located in a covered attainment county other than Bastrop, Bexar, Caldwell, Comal, Guadalupe, Hays, Travis, Williamson, or Wilson County, transfers are made to stationary storage tanks greater than 1000 gallons located at a facility which has dispensed less than 100,000 gallons of gasoline in a calendar month after October 31, 2014. <i>If the response to Question III.E.7 is "Yes," go to Section III.F.</i>	☐ Yes ☐ No

Application Area-Wide Applicability Determinations and General Information

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Federal Operating Permit Program Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
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For SOP applications, answer ALL questions unless otherwise directed.

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

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>	☐ Yes ☐ No
◆ 9.	Transfers are made to stationary storage tanks located at a motor vehicle fuel dispensing facility which has dispensed no more than 10,000 gallons of gasoline in any calendar month after January 1, 1991 and for which construction began prior to November 15, 1992.	☐ Yes ☒ No
◆ 10.	Transfers are made to stationary storage tanks located at a motor vehicle fuel dispensing facility which has dispensed more than 10,000 gallons of gasoline in any calendar month after January 1, 1991 and for which construction began prior to November 15, 1992.	☐ Yes ☒ No
◆ 11.	Transfers are made to stationary storage tanks located at a motor vehicle fuel dispensing facility which commenced construction on or after November 15, 1992.	☒ Yes ☐ No
◆ 12.	At facilities located in Ellis, Johnson, Kaufman, Parker, or Rockwall County, transfers are made to stationary storage tanks located at a facility which has dispensed at least 10,000 gallons of gasoline but less than 125,000 gallons of gasoline in a calendar month after April 30, 2005.	☐ Yes ☐ No
F. 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.	☐ Yes ☐ No ☒ N/A

Application Area-Wide Applicability Determinations and General Information

Form OP-REQ1 (Page 8)

Federal Operating Permit Program Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
07/08/2025	O-1348	RN100213016

For SOP applications, answer ALL questions unless otherwise directed.

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

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.	☐ Yes ☐ No ☒ N/A
◆ 3.	Tank-truck tanks are filled with, or emptied of, gasoline at a facility that is subject to 30 TAC § 115.214(b)(1)(C) or 115.224(2) within the application area.	☐ Yes ☐ No ☒ N/A
G. 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>	☒ Yes ☐ No ☐ N/A
◆ 2.	The application area includes facilities that began construction on or after November 15, 1992 and prior to May 16, 2012.	☒ Yes ☐ No
◆ 3.	The application area includes facilities that began construction prior to November 15, 1992. <i>If the responses to Questions III.G.2 and III.G.3 are both "No," go to Section III.H.</i>	☐ Yes ☒ No
◆ 4.	The application area includes only facilities that have a monthly throughput of less than 10,000 gallons of gasoline.	☒ Yes ☐ No
◆ 5.	The decommissioning of all Stage II vapor recovery control equipment located in the application area has been completed and the decommissioning notice submitted.	☐ Yes ☐ No ☒ N/A

Application Area-Wide Applicability Determinations and General Information

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Federal Operating Permit Program Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
07/08/2025	O-1348	RN100213016

For SOP applications, answer ALL questions unless otherwise directed.

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

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>	☒ Yes ☐ No ☐ N/A
◆ 2.	The application area includes stationary tanks, reservoirs, or other containers holding gasoline that will be used exclusively for the fueling of agricultural implements.	☐ Yes ☒ No
◆ 3.	The application area includes a motor vehicle fuel dispensing facility.	☒ Yes ☐ No
◆ 4.	The application area includes stationary tanks, reservoirs, or other containers holding gasoline and having a nominal capacity of 500 gallons or less.	☐ Yes ☒ No
I. Process Unit Turnaround and Vacuum-Producing Systems in Petroleum Refineries		
1.	The application area is located at a petroleum refinery.	☒ Yes ☐ 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.	☐ Yes ☐ No ☒ N/A

Application Area-Wide Applicability Determinations and General Information

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Federal Operating Permit Program

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Date	Permit No.	Regulated Entity No.
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For SOP applications, answer ALL questions unless otherwise directed.

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

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>	☐ Yes ☒ No ☐ N/A
2.	The use, application, sale, or offering for sale of conventional cutback asphalt containing VOC solvents for the paving of roadways, driveways, or parking lots occurs in the application area.	☐ Yes ☒ No ☐ N/A
3.	Asphalt emulsion is used or produced within the application area.	☐ Yes ☒ No
4.	The application area is using an alternate control requirement as specified in 30 TAC § 115.513. <i>If the response to Question III.K.4 is "No," go to Section III.L.</i>	☐ Yes ☒ No
5.	The application area uses, applies, sells, or offers for sale asphalt concrete, made with cutback asphalt, that meets the exemption specified in 30 TAC § 115.517(1).	☐ Yes ☒ No
6.	The application area uses, applies, sells, or offers for sale cutback asphalt that is used solely as a penetrating prime coat.	☐ Yes ☒ No
7.	The applicant using cutback asphalt is a state, municipal, or county agency.	☐ Yes ☒ No
L. 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>	☒ Yes ☐ No ☐ N/A
◆ 2.	Degassing of only ocean-going, self-propelled VOC marine vessels is performed in the application area. <i>If the response to Question III.L.2 is "Yes," go to Section III.M.</i>	☐ Yes ☒ No ☐ N/A

Application Area-Wide Applicability Determinations and General Information

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Federal Operating Permit Program

Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
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For SOP applications, answer ALL questions unless otherwise directed.

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

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.	☒ Yes ☐ No ☐ N/A
◆ 4.	Degassing of stationary VOC storage vessels with a nominal storage capacity of 250,000 gallons or more, or a nominal storage capacity of 75,000 gallons and storing materials with a true vapor pressure greater than 2.6 psia, and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	☒ Yes ☐ No ☐ N/A
◆ 5.	Degassing of VOC transport vessels with a nominal storage capacity of 8,000 gallons or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	☒ Yes ☐ No
◆ 6.	Degassing of VOC marine vessels with a nominal storage capacity of 10,000 barrels (420,000 gallons) or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	☒ Yes ☐ No ☐ N/A
◆ 7.	Degassing of VOC marine vessels with a nominal storage capacity of 10,000 barrels (420,000 gallons) and a vapor space partial pressure $\geq$ 0.5 psia that have sustained damage as specified in 30 TAC § 115.547(5) is performed in the application area.	☐ Yes ☒ No ☐ N/A
M. Petroleum Dry Cleaning Systems		
1.	The application area contains one or more petroleum dry cleaning facilities that use petroleum-based solvents.	☐ Yes ☒ No ☐ N/A

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

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.	☐ Yes ☒ No ☐ 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>	☐ Yes ☒ No ☐ 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.	☐ Yes ☐ No
4.	All vent streams in the application area that are not routed to a flare contain less than 100 ppmv HRVOC at all times. <i>If the responses to Questions III.N.3 and III.N.4 are both "Yes," go to Section III.O.</i>	☐ Yes ☐ No
5.	The application area contains pressure relief valves that are not controlled by a flare.	☐ Yes ☐ No
6.	The application area has at least one vent stream which has no potential to emit HRVOC.	☐ Yes ☐ No
7.	The application area has vent streams from a source described in 30 TAC § 115.727(c)(3)(A) - (H).	☐ Yes ☐ No
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.	☐ Yes ☒ No ☐ N/A

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

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>	☐ Yes ☒ 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>	☐ Yes ☒ 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>	☐ Yes ☒ 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>	☐ Yes ☐ No
2. The application area is complying with a System Cap in 30 TAC §§ 117.1020 or 117.1220.	☐ Yes ☐ No

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

IV. Title 30 TAC Chapter 117 - Control of Air Pollution from Nitrogen Compounds (continued)		
C. Commercial, Institutional, and Industrial Sources in Ozone Nonattainment Areas		
◆ 1.	The application area is located at a site subject to 30 TAC Chapter 117, Subchapter B and includes units specified in 30 TAC §§ 117.100, 117.300, or 117.400. <i>For SOP applications, if the response to Question IV.C.1 is "No," go to Question IV.D.1. For GOP applications for GOP 517, if the response to Question IV.C.1 is "No," go to Section IV.F.</i>	☐ Yes ☐ NO
◆ 2.	The application area is located at a site that was a major source of NO _x before November 15, 1992.	☐ Yes ☐ No ☐ N/A
◆ 3.	The application area includes an electric generating facility required to comply with the System Cap in 30 TAC § 117.320.	☐ Yes ☐ No
D. Adipic Acid Manufacturing		
1.	The application area is located at, or part of, an adipic acid production unit.	☐ Yes ☐ No ☐ N/A
E. Nitric Acid Manufacturing - Ozone Nonattainment Areas		
1.	The application area is located at, or part of, a nitric acid production unit.	☐ Yes ☐ No ☐ N/A
F. Combustion Control at Minor Sources in Ozone Nonattainment Areas - Boilers, Process Heaters, Stationary Engines and Gas Turbines		
◆ 1.	The application area is located at a site that is a minor source of NO _x in the Houston/Galveston/Brazoria or Dallas/Fort Worth Eight-Hour areas (except for Wise County). <i>For SOP applications, if the response to Question IV.F.1 is "No," go to Question IV.G.1. For GOP applications, if the response to Question IV.F.1 is "No," go to Section VI.</i>	☐ Yes ☐ No
◆ 2.	The application area is located in the Houston/Galveston/Brazoria area and has units that qualify for an exemption under 30 TAC § 117.2003(a).	☐ Yes ☐ No
◆ 3.	The application area is located in the Houston/Galveston/Brazoria area and has units that qualify for an exemption under 30 TAC § 117.2003(b).	☐ Yes ☐ No

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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.	☐ Yes ☐ No
◆ 5.	The application area has units subject to the emission specifications under 30 TAC §§ 117.2010 or 30 TAC § 117.2110.	☐ Yes ☐ No
6.	The application area has a unit that has been approved for alternative case specific specifications (ACSS) in 30 TAC § 117.2025 or 30 TAC § 117.2125. <i>If the response to Question IV.F.6 is "No," go to Section IV.G.</i>	☐ Yes ☐ No
7.	An ACSS for carbon monoxide (CO) has been approved?	☐ Yes ☐ No
8.	An ACSS for ammonia (NH ₃) has been approved?	☐ Yes ☐ No
9.	Provide the Permit Number(s) and authorization/issuance date(s) of the NSR 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>	☐ Yes ☐ No
2.	The application area is complying with the System Cap in 30 TAC § 117.3020.	☐ Yes ☐ 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>	☐ Yes ☒ No
2.	All water heaters, boilers or process heaters manufactured, distributed, retailed or installed qualify for an exemption under 30 TAC § 117.3203.	☐ Yes ☐ No

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

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

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

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.	☐ Yes ☒ No
2.	The application area manufactures or imports architectural coatings that are registered under the Federal Insecticide, Fungicide, and Rodenticide Act. <i>If the responses to Questions V.C.1-2 are both "No," go to Section V.D.</i>	☐ Yes ☒ No
3.	All architectural coatings manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR §59.400(c)(1)-(5).	☐ Yes ☐ No
D. 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.	☐ Yes ☒ No
2.	The application area is a distributor of aerosol coatings for resale or distribution in the United States.	☐ Yes ☒ 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>	☐ Yes ☒ No
2.	All portable fuel containers manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR § 59.605(a) - (c).	☐ Yes ☐ No
VI. Title 40 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>	☒ Yes ☐ No

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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>	☐ Yes ☒ 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>	☐ Yes ☐ 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>	☐ Yes ☐ 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>	☐ Yes ☐ No
5.	The open storage pile was constructed, reconstructed or modified after May 27, 2009.	☐ Yes ☐ No
C. Subpart GG - Standards of Performance for Stationary Gas Turbines (GOP applicants only)		
◆ 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.E.</i>	☐ Yes ☐ No ☒ N/A
◆ 2.	One or more of the affected facilities were constructed, modified, or reconstructed after October 3, 1977 and prior to February 19, 2005. <i>If the response to Question VI.C.2 is "No," go to Section VI.E.</i>	☐ Yes ☐ No
◆ 3.	One or more stationary gas turbines in the application area are using a previously approved alternative fuel monitoring schedule as specified in 40 CFR § 60.334(h)(4).	☐ Yes ☐ No
◆ 4.	The exemption specified in 40 CFR § 60.332(e) is being utilized for one or more stationary gas turbines in the application area.	☐ Yes ☐ No

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

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

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

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

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VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)		
G. Subpart QQQ - Standards of Performance for VOC Emissions from Petroleum Refinery Wastewater Systems (continued)		
3.	The application area includes ancillary equipment which is physically separate from the wastewater system and does not come in contact with or store oily wastewater.	☒ Yes ☐ No
4.	The application area includes non-contact cooling water systems.	☒ Yes ☐ 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>	☒ Yes ☐ No
6.	The application area includes one or more individual drain systems that meet the exemption specified in 40 CFR § 60.692-2(d).	☐ Yes ☒ No
7.	The application area includes completely closed drain systems.	☐ Yes ☒ No
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>	☐ Yes ☐ No ☒ N/A
◆ 2.	The application area includes at least one small municipal waste incineration unit, other than an air curtain incinerator, constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006.	☐ Yes ☐ No
◆ 3.	The application area includes at least one small municipal waste incineration unit, other than an air curtain incinerator, constructed before August 30, 1999 and not modified or reconstructed on or after June 6, 2006.	☐ Yes ☐ No
◆ 4.	The application area includes at least one air curtain incinerator. <i>If the response to Question VI.H.4 is "No," go to Section VI.I.</i>	☐ Yes ☐ No

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

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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.	☐ Yes ☐ 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>	☐ Yes ☐ No
◆ 5.	The application area includes at least one air curtain incinerator, constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001. <i>If the response to Question VI.I.5 is "No," go to VI.I.7.</i>	☐ Yes ☐ No
◆ 6.	All air curtain incinerators constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	☐ Yes ☐ No
◆ 7.	The application area includes at least one air curtain incinerator, constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001.	☐ Yes ☐ No
◆ 8.	All air curtain incinerators constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	☐ Yes ☐ No

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VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)		
J. Subpart EEEE - Standards of Performance for Other Solid Waste Incineration Units for Which Construction Commenced After December 9, 2004 or for Which Modification or Reconstruction Commenced on or After June 16, 2006		
◆ 1.	The application area includes at least one very small municipal waste incineration unit or institutional incineration unit, other than an air curtain incinerator. <i>If the response to Question VI.J.1 is "N/A," go to Section VI.K. If the response to Question VI.J.1 is "No," go to Question VI.J.4.</i>	☐ Yes ☐ No ☒ N/A
◆ 2.	The application area includes at least one very small municipal waste incineration unit, other than an air curtain incinerator, constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006.	☐ Yes ☐ No
◆ 3.	The application area includes at least one very small municipal waste incineration unit, other than an air curtain incinerator, constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006.	☐ Yes ☐ No
◆ 4.	The application area includes at least one air curtain incinerator. <i>If the response to Question VI.J.4 is "No," go to Section VI.K.</i>	☐ Yes ☐ No
◆ 5.	The application area includes at least one air curtain incinerator constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006. <i>If the response to Question VI.J.5 is "No," go to Question VI.J.7.</i>	☐ Yes ☐ No
◆ 6.	All air curtain incinerators constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	☐ Yes ☐ No
◆ 7.	The application area includes at least one air curtain incinerator constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006.	☐ Yes ☐ No

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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.	☐ Yes ☐ No
◆ 9.	The air curtain incinerator is located at an institutional facility and is a distinct operating unit of the institutional facility that generated the waste.	☐ Yes ☐ No
◆ 10.	The air curtain incinerator burns less than 35 tons per day of wood waste, clean lumber, or yard waste or a mixture of these materials.	☐ Yes ☐ No
K. Subpart OOOO - Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution		
◆ 1.	The application area includes one or more of the onshore affected facilities listed in 40 CFR § 60.5365(a)-(g) that are subject to 40 CFR Part 60, Subpart OOOO.	☐ Yes ☒ No
VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants		
A. Applicability		
◆ 1.	The application area includes a unit(s) that is subject to one or more 40 CFR Part 61 subparts. <i>If the response to Question VII.A.1 is "No" or "N/A," go to Section VIII.</i>	☒ Yes ☐ No ☐ N/A
B. Subpart F - National Emission Standard for Vinyl Chloride		
1.	The application area is located at a plant which produces ethylene dichloride by reaction of oxygen and hydrogen chloride with ethylene, vinyl chloride by any process, and/or one or more polymers containing any fraction of polymerized vinyl chloride.	☐ Yes ☒ 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.	☐ Yes ☐ No ☐ N/A

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VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)	
D. Subpart L - National Emission Standard for Benzene Emissions from Coke By-Product Recovery Plants	
1. The application area is located at a coke by-product recovery plant and includes one or more of the affected sources identified in 40 CFR § 61.130(a) - (b). <i>If the response to Question VII.D.1 is "No," go to Section VII.E.</i>	☐ Yes ☒ No
2. The application area includes equipment in benzene service as determined by 40 CFR § 61.137(b).	☐ Yes ☐ No
3. The application area has elected to comply with the provisions of 40 CFR § 61.243-1 and 40 CFR § 61.243-2.	☐ Yes ☐ No
E. Subpart M - National Emission Standard for Asbestos	
Applicability	
1. The application area includes sources, operations, or activities specified in 40 CFR §§ 61.143, 61.144, 61.146, 61.147, 61.148, or 61.155. <i>If the response to Question VII.E.1 is "No," go to Section VII.F.</i>	☐ Yes ☒ No
Roadway Construction	
2. The application area includes roadways constructed or maintained with asbestos tailings or asbestos-containing waste material.	☐ Yes ☐ No
Manufacturing Commercial Asbestos	
3. The application area includes a manufacturing operation using commercial asbestos. <i>If the response to Question VII.E.3 is "No," go to Question VII.E.4.</i>	☐ Yes ☐ No
a. Visible emissions are discharged to outside air from the manufacturing operation	☐ Yes ☐ No
b. An alternative emission control and waste treatment method is being used that has received prior U.S. Environmental Protection Agency (EPA) approval.	☐ Yes ☐ No

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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.	☐ Yes ☐ No
d. Asbestos-containing waste material is adequately wetted.	☐ Yes ☐ No
e. Alternative filtering equipment is being used that has received EPA approval.	☐ Yes ☐ No
f. A high efficiency particulate air (HEPA) filter is being used that is certified to be at least 99.97% efficient for 0.3-micron particles	☐ Yes ☐ No
g. The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.	☐ Yes ☐ No
<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>	☐ Yes ☐ 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>	☐ Yes ☐ No
b. Spray-on applications on buildings, structures, pipes, and conduits do not use material containing more than 1% asbestos.	☐ Yes ☐ No
c. An alternative emission control and waste treatment method is being used that has received prior EPA approval.	☐ Yes ☐ No

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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.	☐ Yes ☐ No
e. Asbestos-containing waste material is adequately wetted.	☐ Yes ☐ No
f. Alternative filtering equipment is being used that has received EPA approval.	☐ Yes ☐ No
g. A HEPA filter is being used that is certified to be at least 99.97% efficient for 0.3-micron particles.	☐ Yes ☐ No
h. The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.	☐ Yes ☐ No
<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>	☐ Yes ☐ No
a. Visible emissions are discharged to outside air from the manufacturing operation.	☐ Yes ☐ No
b. An alternative emission control and waste treatment method is being used that has received prior EPA approval.	☐ Yes ☐ No
c. Asbestos-containing waste material is processed into non-friable forms.	☐ Yes ☐ No
d. Asbestos-containing waste material is adequately wetted.	☐ Yes ☐ No
e. Alternative filtering equipment is being used that has received EPA approval.	☐ Yes ☐ No

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VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)	
E. Subpart M - National Emission Standard for Asbestos (continued)	
<i>Fabricating Commercial Asbestos (continued)</i>	
f. A HEPA filter is being used that is certified to be at least 99.97% efficient for 0.3-micron particles.	☐ Yes ☐ No
g. The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.	☐ Yes ☐ No
<i>Non-sprayed Asbestos Insulation</i>	
6. The application area includes insulating materials (other than spray applied insulating materials) that are either molded and friable or wet-applied and friable after drying.	☐ Yes ☐ 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.	☐ Yes ☐ 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.	☐ Yes ☒ 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>	☐ Yes ☒ No
2. The application area includes benzene transfer operations at marine vessel loading racks.	☐ Yes ☐ No

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VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)	
G. Subpart BB - National Emission Standard for Benzene Emissions from Benzene Transfer Operations (continued)	
3. The application area includes benzene transfer operations at railcar loading racks.	☐ Yes ☐ No
4. The application area includes benzene transfer operations at tank-truck loading racks.	☐ Yes ☐ 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.	☒ Yes ☐ No
2. The application area is located at a hazardous waste treatment, storage, and disposal (TSD) facility site as described in 40 CFR § 61.340(b). <i>If the responses to Questions VII.H.1 and VII.H.2 are both "No," go to Section VIII.</i>	☐ Yes ☒ No
3. The application area is located at a site that has no benzene onsite in wastes, products, byproducts, or intermediates. <i>If the response to Question VII.H.3 is "Yes," go to Section VIII.</i>	☐ Yes ☒ No
4. The application area is located at a site having a total annual benzene quantity from facility waste less than 1 megagram per year (Mg/yr). <i>If the response to Question VII.H.4 is "Yes," go to Section VIII</i>	☐ Yes ☒ No
5. The application area is located at a site having a total annual benzene quantity from facility waste greater than or equal to 1 Mg/yr but less than 10 Mg/yr. <i>If the response to Question VII.H.5 is "Yes," go to Section VIII.</i>	☐ Yes ☒ No

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

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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>	☒ Yes ☐ No
16. The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers. <i>If the response to Question VII.H.16 is "Yes," go to Question VII.H.18.</i>	☐ Yes ☒ No
17. Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	☐ Yes ☒ No
Individual Drain Systems	
18. The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage non-exempt benzene waste. <i>If the response to Question VII.H.18 is "No," go to Question VII.H.25.</i>	☒ Yes ☐ No
19. The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. <i>If the response to Question VII.H.19 is "Yes," go to Question VII.H.25.</i>	☒ Yes ☐ No
20. The application area has individual drain systems complying with 40 CFR § 61.346(a). <i>If the response to Question VII.H.20 is "No," go to Question VII.H.22.</i>	☐ Yes ☒ No
21. Covers and closed-vent systems used for individual drain systems operate such that the individual drain system is maintained at a pressure less than atmospheric pressure.	☐ Yes ☒ No

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VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)	
H. Subpart FF - National Emission Standard for Benzene Waste Operations (continued)	
<i>Individual Drain Systems (continued)</i>	
22. The application area has individual drain systems complying with 40 CFR § 61.346(b). <i>If the response to Question VII.H.22 is "No," go to Question VII.H.25.</i>	☒ Yes ☐ 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.	☒ Yes ☐ No
24. Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device.	☒ Yes ☐ No
<i>Remediation Activities</i>	
25. Remediation activities take place at the application area subject to 40 CFR Part 61, Subpart FF.	☐ Yes ☒ 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>	☒ Yes ☐ 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>	☒ Yes ☐ No

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

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
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>	☐ Yes ☐ No
2. The application area includes fixed roofs, covers, and/or enclosures that are required to comply with 40 CFR § 63.148.	☐ Yes ☐ No
3. The application area includes vapor collection systems or closed-vent systems that are required to comply with 40 CFR § 63.148. <i>If the response to Question VIII.C.3 is "No," go to Question VIII.C.8.</i>	☐ Yes ☐ No
4. The application area includes vapor collection systems or closed-vent systems that are constructed of hard piping.	☐ Yes ☐ No
5. The application area includes vapor collection systems or closed-vent systems that contain bypass lines that could divert a vent stream away from a control device and to the atmosphere. <i>If the response to Question VIII.C.5 is "No," go to Question VIII.C.8.</i>	☐ Yes ☐ 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.	☐ Yes ☐ No
7. Bypass lines in the application area are secured in the closed position with a car-seal or a lock-and-key type configuration.	☐ Yes ☐ No

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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>	☐ Yes ☐ No
9. The application area includes operations that are complying with § 63.119(g)(6) through the use of a closed-vent system with a control device used to reduce inlet emissions of HAPs by at least 95 percent by weight or greater.	☐ Yes ☐ No
10. The application area includes operations that are complying with § 63.119(g)(6) through the use of a vapor balancing system.	☐ Yes ☐ No
<i>Transfer Racks</i>	
11. The application area includes Group 1 transfer racks that load organic HAPs.	☐ Yes ☐ 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>	☐ Yes ☐ No
13. The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Part 61, Subpart FF. <i>If the response to Question VIII.C.13 is "No," go to Question VIII.C.15.</i>	☐ Yes ☐ No
14. The application area includes process wastewater streams that are complying with 40 CFR §§ 63.110(e)(1)(i) and (e)(1)(ii).	☐ Yes ☐ No
15. The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Part 61, Subpart F. <i>If the response to Question VIII.C.15 is "No," go to Question VIII.C.17.</i>	☐ Yes ☐ No

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

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

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

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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)	
<i>Drains (continued)</i>	
37. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds listed in 40 CFR Part 63 Subpart G, Table 9, at an annual average flow rate greater than or equal to 10 liters per minute.	☐ Yes ☐ No
38. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of a chemical manufacturing process unit that is subject to the new source requirements of 40 CFR § 63.100(l)(1) or (l)(2); and the equipment conveys water with a total annual average concentration greater than or equal to 10 parts per million by weight of compounds listed in 40 CFR Part 63 Subpart G, Table 8, at an average annual flow rate greater than or equal to 0.02 liter per minute.	☐ Yes ☐ No
<i>Gas Streams</i>	
39. The application area includes gas streams meeting the characteristics of 40 CFR § 63.107(b) - (h) or the criteria of 40 CFR § 63.113(i) and are transferred to a control device not owned or operated by the applicant.	☐ Yes ☐ No
40. The applicant is unable to comply with 40 CFR §§ 63.113 - 63.118 for one or more reasons described in 40 CFR § 63.100(q)(1), (3), or (5).	☐ Yes ☐ No
D. Subpart N - National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks	
1. The application area includes chromium electroplating or chromium anodizing tanks located at hard chromium electroplating, decorative chromium electroplating, and/or chromium anodizing operations.	☐ Yes ☒ No

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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>	☐ Yes ☒ 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>	☐ Yes ☐ No
3.	The sterilization source has used less than 1 ton (907 kg) of ethylene oxide within all consecutive 12-month periods after December 6, 1996.	☐ Yes ☐ No
4.	The sterilization source has used less than 10 tons (9070 kg) of ethylene oxide within all consecutive 12-month periods after December 6, 1996.	☐ Yes ☐ No
F. 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>	☒ Yes ☐ No
2.	Chromium-based water treatment chemicals have been used on or after September 8, 1994.	☐ Yes ☒ 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.	☐ Yes ☒ 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>	☐ Yes ☒ No
3.	The bulk gasoline terminal or pipeline breakout station is located within a contiguous area and under common control with another bulk gasoline terminal or a pipeline breakout station. <i>If the response to Question VIII.G.3 is "Yes," go to Question VIII.G.10.</i>	☐ Yes ☐ No

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
G. Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) (continued)		
4.	The bulk gasoline terminal or pipeline breakout station is located within a contiguous area and under common control with sources, other than bulk gasoline terminals or pipeline breakout stations that emit or have the potential to emit HAPs. <i>If the response to Question VIII.G.4 is "Yes," go to Question VIII.G.10.</i>	☐ Yes ☐ No
5.	An emissions screening factor was calculated for the bulk gasoline terminal or pipeline breakout station. <i>If the response to Question VIII.G.5 is "No," go to Question VIII.G.10.</i>	☐ Yes ☐ No
6.	The value 0.04(OE) is less than 5% of the value of the bulk gasoline terminal emissions screening factor (ET) or the pipeline breakout station emissions screening factor (Ep). <i>If the response to Question VIII.G.6 is "No," go to Question VIII.G.10.</i>	☐ Yes ☐ No
7.	Emissions screening factor less than 0.5 (ET or EP < 0.5). <i>If the response to Question VIII.G.7 is "Yes," go to Section VIII.H.</i>	☐ Yes ☐ No
8.	Emissions screening factor greater than or equal to 0.5, but less than 1.0 (0.5 ≤ ET or EP < 1.0). <i>If the response to Question VIII.G.8 is "Yes," go to Section VIII.H.</i>	☐ Yes ☐ No
9.	Emissions screening factor greater than or equal to 1.0 (ET or EP ≥ 1.0). <i>If the response to Question VIII.G.9 is "Yes," go to Question VIII.G.11.</i>	☐ Yes ☐ No
10.	The site at which the application area is located is a major source of HAP. <i>If the response to Question VIII.G.10 is "No," go to Section VIII.H.</i>	☐ Yes ☐ No
11.	The application area is using an alternative leak monitoring program as described in 40 CFR § 63.424(f).	☐ Yes ☐ No

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

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

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

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins (continued)	
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.	☐ Yes ☐ 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>	☐ Yes ☐ No
13. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	☐ Yes ☐ No
14. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	☐ Yes ☐ No
15. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of an elastomer product process unit. <i>If the response to Question VIII.J.15 is "No," go to Section VIII.K.</i>	☐ Yes ☐ No
16. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that meet the criteria listed in 40 CFR § 63.149(d) and § 63.501(a)(12). <i>If the response to Question VIII.J.16 is "No," go to Section VIII.K.</i>	☐ Yes ☐ No

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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)	
<i>Drains (continued)</i>	
17. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.482, at any flow rate.	☐ Yes ☐ No
18. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.482, at an annual average flow rate greater than or equal to 10 liters per minute.	☐ Yes ☐ No
19. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of an elastomer product process unit that is a new affected source or part of a new affected source and the equipment conveys water with a total annual average concentration greater than or equal to 10 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.482, at an average annual flow rate greater than or equal to 0.02 liter per minute.	☐ Yes ☐ No
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>	☐ Yes ☒ No ☐ N/A
2. The application area includes a BLR and/or WSR research and development facility.	☐ Yes ☐ No

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
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>	☐ Yes ☒ No ☐ N/A
2. The application area is using and approved alternate to the requirements of § 63.545(c)(1)-(5) for control of fugitive dust emission sources.	☐ Yes ☐ No
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.	☐ Yes ☒ 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>	☒ Yes ☐ No
2. All petroleum refining process units/and or related emission points within the application area are specified in 40 CFR § 63.640(g)(1) - (g)(7). <i>If the response to Question VIII.N.2 is "Yes," go to Section VIII.O.</i>	☒ Yes ☐ No

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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>	☐ Yes ☐ No
4. The application area is located at a plant site which emits or has equipment containing/contacting one or more of the HAPs listed in table 1 of 40 CFR Part 63, Subpart CC. <i>If the response to Question VIII.N.4 is "No," go to Section VIII.O.</i>	☐ Yes ☐ No
5. The application area includes Group 1 wastewater streams that are not conveyed, stored, or treated in a wastewater stream management unit that also receives streams subject to the provisions of 40 CFR §§ 63.133 - 63.147 of Subpart G wastewater provisions section.	☐ Yes ☐ No
6. The application area includes Group 2 wastewater streams that are not conveyed, stored, or treated in a wastewater stream management unit that also receives streams subject to the provisions of 40 CFR §§ 63.133 - 63.147 of Subpart G wastewater provisions section.	☐ Yes ☐ No
7. The application area includes Group 1 or Group 2 wastewater streams that are conveyed, stored, or treated in a wastewater stream management unit that also receives streams subject to the provisions of 40 CFR §§ 63.133 - 63.147 of Subpart G wastewater provisions section. <i>If the response to Question VIII.N.7 is "No," go to Question VIII.N.13.</i>	☐ Yes ☐ No
8. The application area includes Group 1 or Group 2 wastewater streams that are complying with 40 CFR § 63.640(o)(2)(i).	☐ Yes ☐ No

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
N. Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries (continued)	
<i>Applicability (continued)</i>	
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 Question VIII.N.13.</i>	☐ Yes ☐ No
10. The application area includes Group 2 wastewater streams or organic streams whose benzene emissions are subject to control through the use of one or more treatment processes or waste management units under the provisions of 40 CFR Part 61, Subpart FF on or after December 31, 1992.	☐ Yes ☐ No
Containers, Drains, and other Appurtenances	
11. The application area includes containers that are subject to the requirements of 40 CFR § 63.135 as a result of complying with 40 CFR § 63.640(o)(2)(ii).	☐ Yes ☐ No
12. The application area includes individual drain systems that are subject to the requirements of 40 CFR § 63.136 as a result of complying with 40 CFR § 63.640(o)(2)(ii).	☐ Yes ☐ No
13. The application area includes Group 1 gasoline loading racks as specified in § 63.650(a).	☐ Yes ☐ No
O. Subpart DD - National Emission Standards for Off-site Waste and Recovery Operations	
1. The application area receives material that meets the criteria for off-site material as specified in 40 CFR § 63.680(b)(1). <i>If the response to Question VIII.O.1 is "No" or "N/A," go to Section VIII.P</i>	☐ Yes ☒ No ☐ N/A
2. Materials specified in 40 CFR § 63.680(b)(2) are received at the application area.	☐ Yes ☐ No
3. The application area has a waste management operation receiving off-site material and is regulated under 40 CFR Part 264 or Part 265.	☐ Yes ☐ No

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

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
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>	☐ Yes ☐ No
12. VOHAP concentration is determined by direct measurement.	☐ Yes ☐ No
13. VOHAP concentration is based on knowledge of the off-site material.	☐ Yes ☐ No
14. The application area includes an equipment component that is a pump, compressor, and agitator, pressure relief device, sampling connection system, open-ended valve or line, valve, connector or instrumentation system. <i>If the response to Question VIII.O.14 is "No," go to Question VIII.O.17.</i>	☐ Yes ☐ No
15. An equipment component in the application area contains or contacts off-site material with a HAP concentration greater than or equal to 10% by weight.	☐ Yes ☐ No
16. An equipment component in the application area is intended to operate 300 hours or more during a 12-month period.	☐ Yes ☐ No
17. The application area includes containers that manage non-exempt off-site material.	☐ Yes ☐ No
18. The application area includes individual drain systems that manage non-exempt off-site materials.	☐ Yes ☐ No

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

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>	☐ Yes ☒ No ☐ N/A
2.	The application area includes one or more of the affected sources specified in 40 CFR § 63.741(c)(1) - (7).	☐ Yes ☐ 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.	☐ Yes ☒ No
◆ 2.	The application area contains facilities that process, upgrade or store natural gas prior to the point at which natural gas enters the natural gas transmission and storage source category or is delivered to a final end user. <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>	☐ Yes ☒ 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>	☐ Yes ☐ 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>	☐ Yes ☐ No

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
Q. Subpart - HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities (continued)		
◆ 5.	The application area contains only a facility, prior to the point of custody transfer, with facility-wide actual annual average natural gas throughput less than 18.4 thousand standard cubic meters (649,789.9 ft³) per day and a facility-wide actual annual average hydrocarbon liquid throughput less than 39,700 liters (10,487.6 gallons) per day. <i>For SOP applications, if the response to Question VIII.Q.5 is "Yes," go to Section VIII.R.</i> <i>For GOP applications, if the response to Question VIII.Q.5 is "Yes," go to Section VIII.Z.</i> <i>For all applications, if the response to Question VIII.Q.5 is "No," go to Question VIII.Q.9.</i>	☐ Yes ☐ No
◆ 6.	The application area includes a triethylene glycol (TEG) dehydration unit. <i>For SOP applications, if the answer to Question VIII.Q.6 is "No," go to Section VIII.R. For GOP applications, if the response to Question VIII.Q.6 is "No," go to Section VIII.Z.</i>	☐ Yes ☐ No
◆ 7.	The application area is located at a site that is within the boundaries of UA plus offset or a UC, as defined in 40 CFR § 63.761.	☐ Yes ☐ No
◆ 8.	The site has actual emissions of 5 tons per year or more of a single HAP, or 12.5 tons per year or more of a combination of HAP.	☐ Yes ☐ No
◆ 9.	Emissions for major source determination are being estimated based on the maximum natural gas or hydrocarbon liquid throughput as calculated in § 63.760(a)(1)(i)-(iii).	☐ Yes ☐ No

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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>	☐ Yes ☒ No
2. Shipbuilding or ship repair operations located in the application area are subject to 40 CFR Part 63, Subpart II.	☐ Yes ☐ No
S. 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>	☐ Yes ☒ No ☐ N/A
2. The application area meets the definition of an "incidental wood manufacturer" as defined in 40 CFR § 63.801.	☐ Yes ☐ No
T. 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.	☐ Yes ☒ No ☐ 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>	☐ Yes ☒ No
2. The application area includes containers using Container Level 1 controls.	☐ Yes ☐ No
3. The application area includes containers using Container Level 2 controls.	☐ Yes ☐ No

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
U. Subpart PP - National Emission Standards for Containers (continued)		
4.	The application area includes containers using Container Level 3 controls.	☐ Yes ☐ No
V. Subpart RR - National Emission Standards for Individual Drain Systems		
1.	The application area includes individual drain systems for which another 40 CFR Part 60, 61, or 63 subpart references the use of 40 CFR Part 63, Subpart RR for the control of air emissions.	☐ Yes ☒ No
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards		
1.	The application area includes an acetal resins production process unit; an acrylic and modacrylic fiber production process unit complying with 40 CFR § 63.1103(b)(3)(i); or an existing polycarbonate production process.	☐ Yes ☒ No
2.	The application area includes process wastewater streams generated from an acetal resins production process unit; an acrylic and modacrylic fiber production process unit complying with 40 CFR § 63.1103(b)(3)(i); or an existing polycarbonate production process. <i>If the responses to Questions VIII.W.1 and VIII.W.2 are both "No," go to Question VIII.W.20.</i>	☐ Yes ☒ No
3.	The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 under the requirements of 40 CFR § 63.132(c).	☐ Yes ☐ No
4.	The application area includes process wastewater streams that are determined to be Group 2 under the requirements of 40 CFR § 63.132(c).	☐ Yes ☐ No
5.	All Group 1 wastewater streams at the site are determined to have a total source mass flow rate of less than 1 MG/yr.	☐ Yes ☐ No
6.	The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.W.6 is "No," go to Question VIII.W.8.</i>	☐ Yes ☐ No

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

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

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)	
19. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of an acrylic resins or acrylic and modacrylic fiber production process unit that is part of a new affected source or is a new affected source and the equipment conveys water with a total annual average concentration greater than or equal to 10 ppmw of compounds meeting the definition of organic HAP in Table 9 to 40 CFR Part 60, Subpart G, at an average annual flow rate greater than or equal to 0.02 liter per minute.	☐ Yes ☐ No
20. The application area includes an ethylene production process unit.	☐ Yes ☒ No ☐ N/A
21. The application area includes waste streams generated from an ethylene production process unit. <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>	☐ Yes ☒ No ☐ N/A
22. The waste stream(s) contains at least one of the chemicals listed in 40 CFR § 63.1103(e), Table 7(g)(1). <i>If the response to Question VIII.W.22 is "No," go to Question VIII.W.54.</i>	☐ Yes ☐ 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>	☐ Yes ☐ 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>	☐ Yes ☐ No

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)		
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).	☐ Yes ☐ 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>	☐ Yes ☐ 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>	☐ Yes ☐ 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>	☐ Yes ☐ No
29.	The application area includes containers that receive, manage, or treat a continuous butadiene waste stream.	☐ Yes ☐ 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>	☐ Yes ☐ 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.	☐ Yes ☐ No

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)		
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>	☐ Yes ☐ No
33.	The application area has containers, as defined in 40 CFR § 61.341, that receive a continuous butadiene waste stream. <i>If the response to Question VIII.W.33 is "No," go to Question VIII.W.36.</i>	☐ Yes ☐ No
34.	The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers. <i>If the response to Question VIII.W.34 is "Yes," go to Question VIII.W.36.</i>	☐ Yes ☐ No
35.	Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	☐ Yes ☐ No
36.	The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage a continuous butadiene waste stream. <i>If the response to Question VIII.W.36 is "No," go to Question VIII.W.43.</i>	☐ Yes ☐ No
37.	The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. <i>If the response to Question VIII.W.37 is "Yes," go to Question VIII.W.43.</i>	☐ Yes ☐ No

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

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

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

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

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
X. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins (continued)	
13. The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	☐ Yes ☐ No
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.	☐ Yes ☐ No
Drains	
15. The application area includes individual drain systems that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. <i>If the response to Question VIII.X.15 is "No," go to Question VIII.X.18.</i>	☐ Yes ☐ No
16. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	☐ Yes ☐ No
17. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	☐ Yes ☐ No
18. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of a thermoplastic product process unit. <i>If the response to Question VIII.X.18 is "No," go to Section VIII.Y.</i>	☐ Yes ☐ No

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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>	☐ Yes ☐ No
20. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.1312, at any flow rate.	☐ Yes ☐ No
21. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.1312, at an annual average flow rate greater than or equal to 10 liters per minute.	☐ Yes ☐ No
22. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of an thermoplastic product process unit that is a new affected source or part of a new affected source and the equipment conveys water with a total annual average concentration greater than or equal to 10 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.1312, at an average annual flow rate greater than or equal to 0.02 liter per minute	☐ Yes ☐ No

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
Y. Subpart UUU - National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units.		
1.	The application area is subject to 40 CFR Part 63, Subpart UUU - National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units.	☒ Yes ☐ No
Z. 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.	☐ Yes ☒ 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).	☐ Yes ☒ No
2.	The application area is located at a plant site that is a major source as defined in FCAA § 112(a).	☒ Yes ☐ No
3.	The application area is located at a site that includes miscellaneous chemical manufacturing process units (MCPU) that process, use or generate one or more of the organic hazardous air pollutants listed in § 112(b) of the Clean Air Act or hydrogen halide and halogen HAP. <i>If the response to Question VIII.AA.1, AA.2 or AA.3 is "No," go to Section VIII.BB.</i>	☐ Yes ☒ No
4.	The application area includes process vents, storage vessels, transfer racks, or waste streams associated with a miscellaneous chemical manufacturing process subject to 40 CFR 63, Subpart FFFF. <i>If the response to Question VIII.AA.4 is "No," go to Section VIII.BB.</i>	☐ Yes ☐ No

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
AA. 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.24.</i>	☐ Yes ☐ No
6. The application area includes process wastewater streams, located at existing sources, 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 of 40 CFR Part 63, Subpart FFFF, as appropriate.	☐ Yes ☐ No
7. The application area includes process wastewater streams, located at existing sources, that are Group 2 for compounds listed in Table 8 or Table 8 and Table 9 of 40 CFR Part 63, Subpart FFFF, as appropriate.	☐ Yes ☐ No
8. The application area includes process wastewater streams, located at new sources, 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 of 40 CFR Part 63, Subpart FFFF, as appropriate.	☐ Yes ☐ No
9. The application area includes process wastewater streams, located at new sources, that are Group 2 for compounds listed in Table 8 or Table 8 and Table 9 of 40 CFR Part 63, Subpart FFFF, as appropriate.	☐ Yes ☐ No
10. 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.10 is "Yes," go to Question VIII.AA.24.</i>	☐ Yes ☐ No
11. 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.11 is "No," go to Question VIII.AA.13.</i>	☐ Yes ☐ No
12. The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	☐ Yes ☐ No
13. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	☐ Yes ☐ No

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)		
14.	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.13 and VIII.AA.14 are both "No," go to Question VIII.AA.20.</i>	☐ Yes ☐ No
15.	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.15 is "No," go to Question VIII.AA.17.</i>	☐ Yes ☐ No
16.	The option to document in the notification of compliance status report that the wastewater will be treated in a facility meeting the requirements of 40 CFR § 63.138(h) is elected.	☐ Yes ☐ No
17.	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.17 is "No," go to Question VIII.AA.19.</i>	☐ Yes ☐ No
18.	The transferor is demonstrating that less than 5 percent of the HAP in Table 9 of 40 CFR Part 63, Subpart FFFF is emitted from waste management units up to the activated sludge unit.	☐ Yes ☐ No
19.	The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	☐ Yes ☐ No
20.	The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	☐ Yes ☐ No
21.	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.21 is "No," go to Question VIII.AA.24.</i>	☐ Yes ☐ No
22.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	☐ Yes ☐ No

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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)	
23. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	☐ Yes ☐ No
24. 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.24 is "No," go to Section VIII.BB.</i>	☐ Yes ☐ No
25. 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.25 is "No," go to Section VIII.BB.</i>	☐ Yes ☐ No
26. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration of compounds in table 8 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 10,000 ppmw at any flow rate, and the total annual load of compounds in table 8 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 200 lb/yr.	☐ Yes ☐ No
27. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration of compounds in table 8 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 1,000 ppmw, and the annual average flow rate is greater than or equal to 1 liter per minute.	☐ Yes ☐ No
28. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of a chemical manufacturing process unit that is subject to the new source requirements of 40 CFR § 63.2445(a); and the equipment conveys water with a combined total annual average concentration of compounds in tables 8 and 9 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 30,000 ppmw, and the combined total annual load of compounds in tables 8 and 9 to this subpart is greater than or equal to 1 tpy.	☐ Yes ☐ No

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (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. | ☐ Yes ☒ 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> | ☒ Yes ☐ 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> | ☒ Yes ☐ No |
| 3. All site remediations 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> | ☒ Yes ☐ No |
| 4. All site remediation activities are complete, and the Administrator has been notified in writing.
<i>If the answer to Question VIII.CC.4 is "Yes," go to Section VIII.DD.</i> | ☐ Yes ☐ No |
| 5. 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.5 is "Yes," go to Section VIII.DD.</i> | ☐ Yes ☐ No |
| 6. The site remediation will be completed within 30 consecutive calendar days. | ☐ Yes ☐ No |
| 7. No site remediation will exceed 30 consecutive calendar days.
<i>If the answer to Question VIII.CC.7 is "Yes," go to Section VIII.DD.</i> | ☐ Yes ☐ No |
| 8. Site remediation materials subject to 40 CFR Part 63, Subpart GGGGG are transferred from the application area to an off-site facility. | ☐ Yes ☐ No |
| 9. 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.9 is "Yes," go to Section VIII.DD.</i> | ☐ Yes ☐ No |

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
CC. Subpart GGGGG - National Emission Standards for Hazardous Air Pollutants: Site Remediation (continued)		
10.	The application area includes a remediation material management unit used for cleanup of radioactive mixed waste per § 63.7886(c).	☐ Yes ☐ No
11.	The application area includes a remediation material management unit or combination of units with a total annual quantity of HAP less than 1 Mg/yr that is being exempted from § 63.7886(b) per § 63.7886(d).	☐ Yes ☐ No
12.	The application area includes a remediation material management unit that has an average total VOHAP concentration of remediation material less than 500 ppmw and is complying with § 63.7886(b)(2). <i>If the response to Question VIII.CC.12 is "No," go to Question VIII.CC.14.</i>	☐ Yes ☐ No
13.	The application area includes a remediation material management unit that concentrates all or part of the material such that the material's VOHAP concentration could increase.	☐ Yes ☐ No
14.	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.14 is "No," go to Question VIII.CC.21.</i>	☐ Yes ☐ No
15.	The application area includes containers that are also subject to and complying with another subpart under 40 CFR part 61 or part 63 per § 63.7886(b)(3).	☐ Yes ☐ No
16.	The application area includes containers that are complying with alternative work practice standards that have been approved by the EPA per § 63.7900(e).	☐ Yes ☐ No
17.	The application area includes containers using Container Level 1 controls as specified in 40 CFR § 63.922(b).	☐ Yes ☐ No
18.	The application area includes containers with a capacity greater than 0.46 m ³ that meet the requirements of 40 CFR § 63.7900(b)(3)(i) and (ii).	☐ Yes ☐ No
19.	The application area includes containers using Container Level 2 controls as specified in 40 CFR § 63.923(b).	☐ Yes ☐ No
20.	The application area includes containers using Container Level 3 controls as specified in 40 CFR § 63.924(b).	☐ Yes ☐ No
21.	The application area includes individual drain systems complying with the requirements of 40 CFR § 63.962.	☐ Yes ☐ No

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
DD. Subpart YYYYYY - 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>	☐ Yes ☒ 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>	☐ Yes ☐ No
3. Metallic scrap is utilized in the EAF.	☐ Yes ☐ No
4. Scrap containing motor vehicle scrap is utilized in the EAF.	☐ Yes ☐ No
5. Scrap not containing motor vehicle scrap is utilized in the EAF.	☐ Yes ☐ No
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>	☐ Yes ☒ No
2. The application area includes a pipeline breakout station, as defined in 40 CFR Part 63, Subpart BBBBBB, not subject to the control requirements of 40 CFR Part 63, Subpart R.	☐ Yes ☐ No
3. The application area includes a pipeline pumping station as defined in 40 CFR Part 63, Subpart BBBBBB.	☐ Yes ☐ No

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

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
EE. Subpart BBBBBB - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities (continued)	
11. The bulk gasoline terminal loads gasoline into railcar cargo tanks which collect vapors from a vapor balance system and that system complies with a Federal, State, local, tribal rule or permit.	☐ Yes ☐ No
FF. 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>	☐ Yes ☒ No
◆ 2. The application area includes at least one gasoline dispensing facility as defined in 40 CFR § 63.11132. <i>If the answer to Question VIII.FF.2 is "No," go to Section VIII.GG.</i>	☐ Yes ☐ No
◆ 3. The application area includes at least one gasoline dispensing facility with a monthly throughput of less than 10,000 gallons.	☐ Yes ☐ No
◆ 4. The application area includes at least one gasoline dispensing facility where gasoline is dispensed from a fixed gasoline storage tank into a portable gasoline tank for the on-site delivery and subsequent dispensing into other gasoline-fueled equipment.	☐ Yes ☐ No
GG. 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>	☒ Yes ☐ No
◆ 2. Provide the Subpart designation (i.e. Subpart EEE) in the space provided below.	
40 CFR Part 63, Subpart EEEE, LLLLL and ZZZZ	

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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.	☐ Yes ☒ 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.	☐ Yes ☒ No ☐ 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.	☐ Yes ☒ 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.	☐ Yes ☒ No ☐ N/A
D. Subpart D - Federal Procurement		
◆ 1.	The application area is owned/operated by a department, agency, or instrumentality of the United States.	☐ Yes ☒ No ☐ 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.	☐ Yes ☒ No ☐ N/A
◆ 2.	The application area is a manufacturer, importer, wholesaler, distributor, or retailer of products containing a Class I or Class II substance.	☐ Yes ☒ No ☐ N/A
◆ 3.	The application area is a manufacturer, importer, wholesaler, distributor, or retailer of products manufactured with a process that uses a Class I or Class II substance.	☐ Yes ☒ No ☐ N/A

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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.	☐ Yes ☒ No
◆ 2.	Disposal of appliances (including motor vehicle air conditioners) or refrigerant or non-exempt substitute reclamation occurs in the application area.	☐ Yes ☒ No ☐ N/A
◆ 3.	The application area manufactures appliances or refrigerant recycling and recovery equipment.	☐ Yes ☒ No ☐ N/A
G. 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>	☐ Yes ☒ No ☐ N/A
◆ 2.	All substitutes produced by the application area meet one or more of the exemptions in 40 CFR § 82.176(b)(1) - (7).	☐ Yes ☐ No ☐ N/A
H. Subpart H -Halon Emissions Reduction		
◆ 1.	Testing, servicing, maintaining, repairing, or disposing of equipment containing halons is conducted in the application area.	☐ Yes ☒ No ☐ N/A
◆ 2.	Disposal of halons or manufacturing of halon blends is conducted in the application area.	☐ Yes ☒ No ☐ N/A
XI. 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.	☒ Yes ☐ No

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For SOP applications, answer ALL questions unless otherwise directed.

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

XI. Miscellaneous (continued)		
B. Forms		
◆ 1.	The application area contains units that are potentially subject to a regulation for which the TCEQ has not developed a unit attribute form. <i>If the response to Question XI.B.1 is "No" or "N/A," go to Section XI.C.</i>	☐ Yes ☒ No ☐ N/A
◆ 2.	Provide the Part and Subpart designation for the federal rule(s) or the Chapter, Subchapter, and Division designation for the State regulation(s) in the space provided below.	
C. Emission Limitation Certifications		
◆ 1.	The application area includes units for which federally enforceable emission limitations have been established by certification.	☒ Yes ☐ No
D. Alternative Means of Control, Alternative Emission Limitation or Standard, or Equivalent Requirements		
1.	The application area is located at a site that is subject to a site-specific requirement of the state implementation plan (SIP).	☐ Yes ☒ No
2.	The application area includes units located at the site that are subject to a site-specific requirement of the SIP.	☐ Yes ☒ No
3.	The application area includes units which demonstrate compliance by using an alternative means of control, alternative emission limitation or standard or equivalent requirements approved by the EPA Administrator. <i>If the response to Question XI.D.3 is "Yes," please include a copy of the approval document with the application.</i>	☒ Yes ☐ No
4.	The application area includes units which demonstrate compliance by using an alternative means of control, alternative emission limitation or standard or equivalent requirements approved by the TCEQ Executive Director. <i>If the response to Question XI.D.4 is "Yes," please include a copy of the approval document with the application.</i>	☒ Yes ☐ No

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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.	☐ Yes ☒ No
2.	The application area includes emission units qualifying for the new unit exemption under 40 CFR § 72.7.	☐ Yes ☒ No
3.	The application area includes emission units qualifying for the retired unit exemption under 40 CFR § 72.8.	☐ Yes ☒ No
F. 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>	☐ Yes ☒ No
2.	The application area includes units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart H for NO _x and heat input.	☐ Yes ☐ No
3.	The application area includes gas or oil-fired units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart H for NO _x , and the monitoring requirements of 40 CFR Part 75, Appendix D for heat input.	☐ Yes ☐ No
4.	The application area includes gas or oil-fired peaking units that are complying with the monitoring requirements of 40 CFR Part 75, Appendix E for NO _x , and the monitoring requirements of 40 CFR Part 75, Appendix D for heat input.	☐ Yes ☐ No
5.	The application area includes gas or oil-fired units that are complying with the Low Mass Emissions monitoring requirements of 40 CFR § 75.19 for NO _x and heat input.	☐ Yes ☐ No
6.	The application area includes units that are complying with EPA-approved alternative monitoring system requirements of 40 CFR Part 75, Subpart E for NO _x and heat input.	☐ Yes ☐ No
7.	The application area includes emission units that qualify for the CSAPR NO _x Ozone Season Group 2 retired unit exemption.	☐ Yes ☒ No

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

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>	☐ Yes ☒ No
2.	The application area includes units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart B for SO ₂ and 40 CFR Part 75, Subpart H for heat input.	☐ Yes ☐ No
3.	The application area includes gas or oil-fired units that are complying with the monitoring requirements of 40 CFR Part 75, Appendix D for SO ₂ and heat input.	☐ Yes ☐ No
4.	The application area includes gas or oil-fired units that are complying with the Low Mass Emissions monitoring requirements of 40 CFR § 75.19 for SO ₂ and heat input.	☐ Yes ☐ No
5.	The application area includes units that are complying with EPA-approved alternative monitoring system requirements of 40 CFR Part 75, Subpart E for SO ₂ and heat input.	☐ Yes ☐ No
6.	The application area includes emission units that qualify for the Texas SO ₂ Trading Program retired unit exemption.	☐ Yes ☒ No
H. 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.	☒ Yes ☐ No

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For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

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 . <i>If the response to Question XI.J.4 is "Yes," go to Question XI.J.6.</i>	☐ Yes ☒ No
◆ 5.	The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area where the facilities previously had a collective uncontrolled design capacity to emit 10 tpy or more of NO _x and is subject to 101.351(c).	☐ Yes ☒ No
6.	The application area includes an electric generating facility permitted under 30 TAC Chapter 116, Subchapter I.	☐ Yes ☒ No
◆ 7.	The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area and the site has a potential to emit more than 10 tpy of highly reactive volatile organic compounds (HRVOC) from facilities covered under 30 TAC Chapter 115, Subchapter H, Divisions 1 and 2.	☐ Yes ☒ No
◆ 8.	The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area, the site has a potential to emit 10 tpy or less of HRVOC from covered facilities and the applicant is opting to comply with the requirements of 30 TAC Chapter 101, Subchapter H, Division 6, Highly Reactive VOC Emissions Cap and Trade Program.	☐ Yes ☒ No
K. Periodic Monitoring		
◆ 1.	The applicant or permit holder is submitting at least one periodic monitoring proposal described on Form OP-MON in this application. <i>If the response to Question XI.K.1 is "Yes," go to Section XI.L.</i>	☒ Yes ☐ 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>	☒ Yes ☐ No
◆ 3.	All periodic monitoring requirements are being removed from the permit with this application.	☐ Yes ☒ No

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

XI. Miscellaneous (continued)		
L. Compliance Assurance Monitoring		
◆ 1.	The application area includes at least one unit that does not meet the CAM exemptions in 40 CFR § 64.2(b) for all applicable requirements that it is subject to, and the unit has a pre-control device potential to emit greater than or equal to the amount in tons per year required in a site classified as a major source. <i>If the response to Question XI.L.1 is "No," go to Section XI.M.</i>	☒ Yes ☐ No
◆ 2.	The unit or units defined by XI.L.1 are using a control device to comply with an applicable requirement. <i>If the response to Question XI.L.2 is "No," go to Section XI.M.</i>	☒ Yes ☐ No
◆ 3.	The permit holder has submitted a CAM proposal on Form OP-MON in a previous application.	☒ Yes ☐ No
◆ 4.	The owner/operator or permit holder is submitting a CAM proposal on Form OP-MON according to the deadlines for submittals in 40 CFR § 64.5 in this application. <i>If the responses to Questions XI.L.3 and XI.L.4 are both "No," go to Section XI.M.</i>	☐ Yes ☒ No
5.	The owner/operator or permit holder is submitting a CAM implementation plan and schedule to be incorporated as enforceable conditions in the permit.	☐ Yes ☒ No
6.	Provide the unit identification numbers for the units for which the applicant is submitting a CAM implementation plan and schedule in the space below.	
◆ 7.	At least one unit defined by XI.L.1 and XI.L.2 is using a CEMS, COMS or PEMS meeting the requirements of 40 CFR § 64.3(d)(2).	☒ Yes ☐ No
◆ 8.	All units defined by XI.L.1 and XI.L.2 are using a CEMS, COMS or PEMS meeting the requirements of 40 CFR § 64.3(d)(2). <i>If the response to Question XI.L.8 is "Yes," go to Section XI.M.</i>	☒ Yes ☐ No

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

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.	☐ Yes ☐ No
◆ 10.	At least one of the CAM proposals as described by question XI.L.3 or XI.L.4 addresses VOC, and the emission unit has a capture system as defined in 40 CFR §64.1.	☐ Yes ☐ No
◆ 11.	At least one of the CAM proposals as described by question XI.L.3 or XI.L.4 addresses a regulated pollutant other than particulate matter or VOC, and the emission unit has a capture system as defined in 40 CFR §64.1.	☐ Yes ☐ No
◆ 12.	The control device in the CAM proposal as described by question XI.L.3 or XI.L.4 has a bypass.	☐ Yes ☐ No
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>	☐ Yes ☒ No ☐ N/A
◆ 2.	All air curtain incinerators constructed on or before December 9, 2004 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	☐ Yes ☐ No
XII. New 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>	☐ Yes ☒ No

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

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>	☒ Yes ☐ No
◆ 2.	The application area includes at least one "State Pollution Control Project" Air Quality Standard Permit NSR authorization under 30 TAC § 116.617.	☐ Yes ☒ No
◆ 3.	The application area includes at least one non-rule Air Quality Standard Permit for Pollution Control Projects NSR authorization.	☒ Yes ☐ No
◆ 4.	The application area includes at least one "Installation and/or Modification of Oil and Gas Facilities" Air Quality Standard Permit NSR authorization under 30 TAC § 116.620.	☐ Yes ☒ No
◆ 5.	The application area includes at least one non-rule Air Quality Standard Permit for Oil and Gas Handling and Production Facilities NSR authorization.	☐ Yes ☒ No
◆ 6.	The application area includes at least one "Municipal Solid Waste Landfill" Air Quality Standard Permit NSR authorization under 30 TAC § 116.621.	☐ Yes ☒ No
◆ 7.	The application area includes at least one "Municipal Solid Waste Landfill Facilities and Transfer Stations" Standard Permit authorization under 30 TAC Chapter 330, Subchapter U.	☐ Yes ☒ No
8.	The application area includes at least one "Concrete Batch Plant" Air Quality Standard Permit NSR authorization.	☐ Yes ☒ No
9.	The application area includes at least one "Concrete Batch Plant with Enhanced Controls" Air Quality Standard Permit NSR authorization.	☐ Yes ☒ No
10.	The application area includes at least one "Hot Mix Asphalt Plant" Air Quality Standard Permit NSR authorization.	☐ Yes ☒ No

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

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

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◆ 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

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- ◆ 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
18897	01/21/2025				
162353	09/21/2020				
169325	06/10/2022				

- ◆ **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
106.183	09/04/2000	106.512	06/13/2001		
106.261	11/01/2003				
106.262	11/01/2003				
106.263	11/01/2003				
106.371	09/04/2000				
106.472	09/04/2000				
106.478	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

Attachment 6

OP-REQ2 Form



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

Date	Permit No.	Regulated Entity No.
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Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
A	1	FIREP-4	OP-UA2	30 TAC Chapter 117	§ 117.100, 117.200 117.300, 117.400	Unit is not located in a listed ozone non-attainment county
A	3	T-4114	OP-UA3	40 CFR Part 60, Subpart K	§ 60.110	Tanks do not store petroleum liquids.
A	3	T-4114	OP-UA3	40 CFR Part 60, Subpart Ka	§ 60.110a	Tanks do not store petroleum liquids.
A	3	T-4114	OP-UA3	40 CFR Part 60, Subpart Kb	§ 60.110b	Tanks were constructed, reconstructed, or modified before July 24, 1984, or after July 23, 1984 and have a capacity less than 19812.9 gallons.

Attachment 7

OP-UA Forms



Stationary Reciprocating Internal Combustion Engine Attributes

Form OP-UA2 (Page 4)

Federal Operating Permit Program

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

Subpart ZZZZ: National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
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Unit ID No.	SOP/GOP Index No.	HAP Source	Brake HP	Construction/ Reconstruction Date	Nonindustrial Emergency Engine	Service Type	Stationary RICE Type
FIREP-4	63ZZZZ-T1c	Major	300-500	06+		EMER-A	

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.
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Unit ID No.	SOP/GOP Index No.	Applicability Date	Exemptions	Service	Commencing	Manufacture Date
FIREP-4	60IIII-T1c	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 III: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
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Unit ID No.	SOP/GOP Index No.	Diesel	AES No.	Displacement	Generator Set	Model Year	Install Date
FIREP-4	60III-T1c	DIESEL		10-		2017+	

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 III: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
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Date	Permit No.	Regulated Entity No.
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Unit ID No.	SOP/GOP Index No.	Kilowatts	Filter	AECD	Standard	Compliance Option	PM Compliance	Options
FIREP-4	60III-T1c	E130-368		NO	YES	MANU YES		

Subpart Kb: Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels)
Texas Commission on Environmental Quality

[illegible]

Storage Tank/Vessel Attributes
Form OP-UA3 (Page 4)
Federal Operating Permit Program
Table 4a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter B, Division 1: Storage of Volatile Organic Compounds (VOCs)
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
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Unit ID No.	SOP/GOP Index No.	Alternate Control Requirement	ACR ID No.	Product Stored	Storage Capacity	Throughput	Potential to Emit	Uncontrolled Emissions
T-4114	R115-T1a	NO		VOC1	A40K+			
T-4114	R115-T1b	NO		VOC1	A40K+			
T-120	R115-T1a	NO		VOC1	A40K+			
T-120	R115-T1b	NO		VOC1	A40K+			
T-120	R115-T2a	NO		VOC1	A40K+			
T-120	R115-T2b	NO		VOC1	A40K+			

Storage Tank/Vessel Attributes
Form OP-UA3 (Page 5)
Federal Operating Permit Program
Table 4b: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter B, Division 1: Storage of Volatile Organic Compounds (VOCs)
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
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Unit ID No.	SOP/GOP Index No.	Construction Date	Tank Description	True Vapor Pressure	Primary Seal	Secondary Seal	Control Device Type	Control Device ID No.
T-4114	R115-T1a		IFR1	1-1.5	MSHOE	NCE		
T-4114	R115-T1b		IFR1	1.5+A	MSHOE	NCE		
T-120	R115-T1a		WDEFR1	1-1.5	MSHOE	NCE		
T-120	R115-T1b		WDEFR1	1.5+A	MSHOE	NCE		
T-120	R115-T2a		WDEFR1	1-1.5	MSHOE	NCE		
T-120	R115-T2b		WDEFR1	1.5+A	MSHOE	NCE		

Storage Tank/Vessel Attributes
Form OP-UA3 (Page 15)
Federal Operating Permit Program
Table 10a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart CC: National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
07/08/2025	0-1348	RN100213016

[illegible]

Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
07/08/2025	O-1348	RN100213016

[illegible]

Storage Tank/Vessel Attributes
Form OP-UA3 (Page 17)
Federal Operating Permit Program
Table 10c: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart CC: National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
07/08/2025	0-1348	RN100213016

[illegible]

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 6)
Federal Operating Permit Program
Table 3a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
07/08/2025	O-1348	RN100213016

Unit ID No.	SOP Index No.	Construction/ Modification Date	Heat Input Capacity	Subpart Da	Changes to Existing Affected Facility	Subpart Ea, Eb, AAAA, or CCCC	Subpart KKKK	Subpart Cb or BBBB	Temporary Boiler
F-1013	60Db-H1	05+M	100-250	NO	NO	NO	NO	NO	NO

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 7)
Federal Operating Permit Program
Table 3b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
07/08/2025	O-1348	RN100213016

Unit ID No.	SOP Index No.	D-Series Fuel Type	D-Series Fuel Type	D-Series Fuel Type	Subpart D	Additional Applicability Requirement	ACF Option SO ₂	ACF Option PM	ACF Option NO _x
F-1013	60Db-H1	NG				JA	OTHR	OTHR	OTHR

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 8)
Federal Operating Permit Program
Table 3c: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
07/08/2025	O-1348	RN100213016

Unit ID No.	SOP Index No.	60.42b (k)(2) Low Sulfur Exemption	60.42b (k)(4) Alternative	Post-Combustion Control	60.43b(h)(2) Alternative	Electrical or Mechanical Output	Output Based Limit	60.49 Da(n) Alternative	60.49 Da(m) Alternative
F-1013	60Db-H1	NO			NO	NO			

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 9)
Federal Operating Permit Program
Table 3d: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
07/08/2025	O-1348	RN100213016

Unit ID No.	SOP Index No.	Residual Oil Sampling	Monitoring Type PM	Monitoring Type PM (Opacity)	Monitoring Type NO _x	Monitoring Type SO ₂	Technology Type	Unit Type	Heat Release Rate	Heat Input Gas/Oil	Heat Input Wood	Fuel Heat Input
F-1013	60Db-H1		NONE	CCEM	CEM	NONE	NONE	OTHER	NGHIGH			

Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 10)
Federal Operating Permit Program
Table 3e: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
07/08/2025	O-1348	RN100213016

Unit ID No.	SOP Index No.	Alternate Emission Limit (AEL)	AEL ID. NO.
F-1013	60Db-H1		

Attachment 8

OP-REQ3 Form

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

Table 1a: Additions

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC	Area Name: El Paso Refinery	

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	FIREP-4	OP-UA2	63ZZZZ-T1c	HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6590(c)
1	FIREP-4	OP-UA2	60III-T1c	NOx	40 CFR Part 60, Subpart III	§ 60.4205(c)-Table 4 10 § 60.4206 § 60.4207(b) [G] § 60.4211(f) § 60.4211(c) [G] § 60.4211(a) § 60.4218
1	FIREP-4	OP-UA2	60III-T1c	PM	40 CFR Part 60, Subpart III	§ 60.4205(c)-Table 4 28 § 60.4206 § 60.4207(b) [G] § 60.4211(f) § 60.4211(c) [G] § 60.4211(a) § 60.4218
3	T-4114	OP-UA3	R115-T1a	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)
3	T-4114	OP-UA3	R115-T1b	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)

3	T-4114	OP-UA3	R115-T2a	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.112(a)(1) § 115.112(a)(2) § 115.112(a)(2)(A) § 115.112(a)(2)(B) § 115.112(a)(2)(C) § 115.112(a)(2)(D) § 115.112(a)(2)(E) § 115.112(a)(2)(F) § 115.114(a)(1)(A) § 115.114(a)(1)(B) § 115.114(a)(3)
3	T-4114	OP-UA3	R115-T2b	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.112(a)(1) § 115.112(a)(2)(A) § 115.112(a)(2)(B) § 115.112(a)(2)(C) § 115.112(a)(2)(D) § 115.112(a)(2)(E) § 115.112(a)(2)(F) § 115.114(a)(1)(A) § 115.114(a)(1)(B) § 115.114(a)(3)
3	T-4114	OP-UA3	63CC-T1a	HAPS	40 CFR Part 63, Subpart CC	§63.660 1 §63.642(b), (n) §63.1062(a)
3	T-4114	OP-UA3	63CC-T2a	HAPS	40 CFR Part 63, Subpart CC	§63.660 1 §63.642(b), (n) §63.1062(a)
3	T-4114	OP-UA3	61FF-T1	Benzene	40 CFR Part 61, Subpart FF	§ 61.351(a) [G]§ 60.112b(a)(2) § 61.351(a)(2) § 61.351(b)

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

Table 1b: Additions

Date: 07/08/2025	Regulated Entity No.: RN100213016	Permit No.: O-1348
Company Name: Western Refining Company, LLC	Area Name: El Paso Refinery	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
1	FIREP-4	60III-T1c	NOx	None	None	[G] § 60.4214(d)
1	FIREP-4	60III-T1c	PM	None	None	[G] § 60.4214(d)
3	T-4114	R115-T1a	VOC	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(7)	None
3	T-4114	R115-T1b	VOC	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(7)	None
3	T-4114	R115-T2a	VOC	§ 115.114(a)(1) § 115.114(a)(3) [G]§ 115.117	§ 115.118(a)(3) § 115.118(a)(5) § 115.118(a)(7)	§ 115.114(a)(2)(B) § 115.118(a)(3)
3	T-4114	R115-T2b	VOC	§ 115.114(a)(1) § 115.114(a)(3) [G]§ 115.117	§ 115.118(a)(3) § 115.118(a)(5) § 115.118(a)(7)	§ 115.114(a)(2)(B) § 115.118(a)(3)

3	T-4114	63CC-T1a	HAPS	§63.660(a)(1)-(2) §63.1063(c)(1) [G]§63.1063(c)(1)(i) [G]§63.1063(d)(1) §63.1063(d)(2) [G]§63.1063(d)(3)(i)	§63.655(i) §63.655(i)(1) §63.655(i)(1)(v) §63.655(i)(6) §63.660(a)(1) §63.1063(e)(2) §63.1065 §63.1065(a) [G]§63.1065(b)(1) §63.1065(c) §63.1065(d)	§63.642(f) §63.655(f) §63.655(f)(1)(i)(A) §63.655(f)(6) §63.655(g) §63.655(g)(14) §63.655(h) §63.655(h)(2)(i) §63.655(h)(2)(i)(A) §63.655(h)(2)(i)(B) §63.655(h)(2)(i)(C) §63.655(h)(2)(ii) §63.655(h)(6) §63.655(h)(6)(ii) §63.1066(b)(1) §63.1066(b)(2) §63.1066(b)(3) §63.1066(b)(4)
3	T-4114	63CC-T2a	HAPS	§63.660(a)(1)-(2) §63.1063(c)(1) [G]§63.1063(c)(1)(i) [G]§63.1063(d)(1) §63.1063(d)(2) [G]§63.1063(d)(3)(i)	§63.655(i) §63.655(i)(1) §63.655(i)(1)(v) §63.655(i)(6) §63.660(a)(1) §63.1063(e)(2) §63.1065 §63.1065(a) [G]§63.1065(b)(1) §63.1065(c) §63.1065(d)	§63.642(f) §63.655(f) §63.655(f)(1)(i)(A) §63.655(f)(6) §63.655(g) §63.655(g)(14) §63.655(h) §63.655(h)(2)(i) §63.655(h)(2)(i)(A) §63.655(h)(2)(i)(B) §63.655(h)(2)(i)(C) §63.655(h)(2)(ii) §63.655(h)(6) §63.655(h)(6)(ii) §63.1066(b)(1) §63.1066(b)(2) §63.1066(b)(3) §63.1066(b)(4)

3	T-4114	61FF-T1	Benzene	[G]§ 60.113b(b)(1) [G]§ 60.113b(b)(2) § 60.113b(b)(3) § 60.113b(b)(4) § 60.113b(b)(4)(i) § 60.113b(b)(4)(i)(A) § 60.113b(b)(4)(i)(B) [G]§ 60.113b(b)(4)(ii) § 60.113b(b)(4)(iii) § 60.113b(b)(5) [G]§ 60.113b(b)(6)	§ 60.115b [G]§ 60.115b(b)(3) § 61.356(k)	§ 60.113b(b)(4)(iii) § 60.113b(b)(5) § 60.113b(b)(6)(ii) § 60.115b § 60.115b(b)(1) [G]§ 60.115b(b)(2) § 60.115b(b)(4) § 61.357(e) § 61.357(f)
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Attachment 9

OP-SUMR Form

**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.
07/08/2025	O-1348	RN100213016

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	FIREP-4	OP-UA2	Fire water pump		106.511/9/4/2000[103466]	
A	4	T-120	OP-UA3	External Floating Roof		18897	

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

Table 2

Date	Permit No.	Regulated Entity No.
07/08/2025	O-1348	RN100213016

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.
3	T-4114	OP-UA3	D	GRPEXT3
4	T-120	OP-UA3	A	GRPEXT1

Attachment 10

OP-PBRSUP Form

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
07/08/2025	O-1348	RN100213016

Unit ID No.	Registration No.	PBR No.	Registration Date
112	162439	106.261	9/14/2020
GRPREFUG1	164606	106.261	4/27/2021
XF3901 (Plant 39 Diesel Furnace), XF3902 (Plant 39 Furnace)	171080	106.261, 106.262	1/09/2023
EG4 (South Control Room Standby Generator), EG5 (North Control Room Standby Generator)	127775	106.511	1/23/2015
GRPREFUG1, F-25_SPB, PU-10, P-16	156428	106.261	5/17/2019
EG3 (Clark Street IT UPS Generator)	108054	106.511	3/05/2013
GRPHB3A (H8901, H8902, H8903), CGHT Cooling Tower, F-25_SPB, B-1, B- 3, T-134, CGHT-MSS	81841	106.183, 106.261, 106.262, 106.263, 106.371, 106.478	4/08/2014
EG1 (North Admin Gen), EG2 (North Boiler Gen)	101519	106.511	4/10/2012
P-41 (Rheniformer Catalyst Regeneration)	166171	106.261, 106.262	9/23/2021
GRPREFUG1, LE-FUG	168428	106.261	4/12/2022

Unit ID No.	Registration No.	PBR No.	Registration Date
NS Fire Water Pump (FIREP-1), Fire Water Pumps (FIREP-2, FIREP-3, FIREP-4), Air Compressor Engines (COMP1 through COMP8)	103466	106.511, 106.512	10/6/2022
GRPREFUG1, LE-FUG	139751	106.261	6/08/2016
GRPREFUG1, LE-FUG	151222	106.261	5/18/2018
Fugitives, TK-4124, TK-4272, TK-4273, Alky MSS, 112	138663	106.261, 106.263	4/07/2016
F-16N (North #6 Crude Unit), F-11 (South FCC Unit), 112 (South Main Flare), TranColMSS (Transmix Coalescer MSS)	142938	106.261, 106.262, 106.263	11/09/2016
GRPREFUG1, LE-FUG, F-5	145707	106.261	3/24/2017
GRPREFUG1, LE-FUG, F-5, GRPREFUG4	160827	106.261	5/13/2020
GRPREFUG1, GRPREFUG4, F-5, LE-FUG	172252	106.261	4/18/2023

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
07/08/2025	O-1348	RN100213016

Unit ID No.	PBR No.	Version No./Date
Light-1, Light-2, Light-3, PUMP-1, ENG-36	106.512	6/13/2001
Demulsifier Tank	106.472	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
07/08/2025	O-1348	RN100213016

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
07/08/2025	O-1348	RN100213016

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
112	106.261	9/14/2020	Monitoring of emissions to stay below 106.4 and 106.261 PBR emission limits.
GRPREFFUG1	106.261	4/27/2021	Monitoring of emissions to stay below 106.4 and 106.261 PBR emission limits. Fugitives monitored via the 28VHP LDAR Program.
XF3901 (Plant 39 Diesel Furnace), XF3902 (Plant 39 Furnace)	106.261, 106.262	1/09/2023	Monitoring of emissions to stay below 106.4 and 106.261 PBR emission limits.
EG4 (South Control Room Standby Generator), EG5 (North Control Room Standby Generator)	106.511	1/23/2015	Monitoring to track and record annual operating hours. Follow manufacturer's recommended maintenance as necessary and maintain documentation.
GRPREFFUG1, F-25_SPB, PU-10, P-16	106.261	5/17/2019	Monitoring of emissions to stay below 106.4 and 106.261 PBR emission limits. Fugitives monitored via the 28VHP LDAR Program.
EG3 (Clark Street IT UPS Generator)	106.511	3/05/2013	Monitoring to track and record annual operating hours. Follow manufacturer's recommended maintenance as necessary and maintain documentation.
GRPHB3A (H8901, H8902, H8903), CGHT Cooling Tower, F-25_SPB, B-1, B-3, T-134, CGHT-MSS	106.183, 106.261, 106.262, 106.263, 106.371, 106.478	4/08/2014	Monitoring of emissions to stay below 106.4 and 106.261 PBR emission limits. Monitoring of heat input and fuel type to meet 106.183 requirements. Fugitives monitored via the 28VHP LDAR Program. MSS activities monitored to be less than time periods outlined in 106.263. Monitoring of vapor pressure of stored material to meet 106.478 requirements.
EG1 (North Admin Gen), EG2 (North Boiler Gen)	106.511	4/10/2012	Monitoring to track and record annual operating hours. Follow manufacturer's recommended maintenance as necessary and maintain documentation.
P-41 (Rheniformer Catalyst Regeneration)	106.261, 106.262	9/23/2021	Monitoring of emissions to stay below 106.4 and 106.261 PBR emission limits.

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
GRPREFFUG1, LE-FUG	106.261	4/12/2022	Monitoring of emissions to stay below 106.4 and 106.261 PBR emission limits. Fugitives monitored via the 28VHP LDAR Program.
NS Fire Water Pump (FIREP-1), Fire Water Pumps (FIREP-2, FIREP-3, FIREP-4), Air Compressor Engines (COMP1 through COMP8)	106.511, 106.512	10/6/2022	Monitoring to track and record annual operating hours. Follow manufacturer's recommended maintenance as necessary and maintain documentation. NOx emissions monitoring to meet 106.512 requirements.
GRPREFFUG1, LE-FUG	106.261	6/08/2016	Monitoring of emissions to stay below 106.4 and 106.261 PBR emission limits. Fugitives monitored via the 28VHP LDAR Program.
GRPREFFUG1, LE-FUG	106.261	5/18/2018	Monitoring of emissions to stay below 106.4 and 106.261 PBR emission limits. Fugitives monitored via the 28VHP LDAR Program.
Fugitives, TK-4124, TK-4272, TK-4273, Alky MSS, 112	106.261, 106.263	4/07/2016	Monitoring of emissions to stay below 106.4 and 106.261 PBR emission limits. Fugitives monitored via the 28VHP LDAR Program. MSS activities monitored to be less than time periods outlined in 106.263.
F-16N (North #6 Crude Unit), F-11 (South FCC Unit), 112 (South Main Flare), TranColMSS (Transmix Coalescer MSS)	106.261, 106.262, 106.263	11/09/2016	Monitoring of emissions to stay below 106.4 and 106.261 PBR emission limits. Fugitives monitored via the 28VHP LDAR Program. MSS activities monitored to be less than time periods outlined in 106.263.
GRPREFFUG1, LE-FUG, F-5	106.261	3/24/2017	Monitoring of emissions to stay below 106.4 and 106.261 PBR emission limits. Fugitives monitored via the 28VHP LDAR Program.
GRPREFFUG1, LE-FUG, F-5, GRPREFFUG4	106.261	5/13/2020	Monitoring of emissions to stay below 106.4 and 106.261 PBR emission limits. Fugitives monitored via the 28VHP LDAR Program.
GRPREFFUG1, GRPREFFUG4, F-5, LE-FUG	106.261	4/18/2023	Monitoring of emissions to stay below 106.4 and 106.261 PBR emission limits. Fugitives monitored via the 28VHP LDAR Program.
Light-1, Light-2, Light-3, PUMP-1, ENG-36	106.512	6/13/2001	Monitoring to track and record annual operating hours. Follow manufacturer's recommended maintenance as necessary and maintain documentation. NOx emissions monitoring to meet 106.512 requirements.
Demulsifier Tank	106.472	9/4/2000	Records of the material stored maintained to show compliance with this section.

Attachment 11

Approved Alternative Requirements



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202-2733

FEB 20 1992

L. Ann Allen, Manager
Environmental Affairs
El Paso Refinery, L.P.
6500 Trowbridge
El Paso, Texas 79986

Re: Request for Alternative to the Continuous
Opacity Monitoring System (COMS)

Dear Ms. Allen:

This is in response to the request of El Paso Refinery, L.P. (EPR) dated March 22, 1991, for the approval of an alternative to the Continuous Opacity Monitoring System (COMS) requirement of 40 C.F.R. § 60.105(a)(1), Subpart J. The following continuous parameter monitoring protocol is approved as an alternative to the COMS required by § 60.105(a)(1):

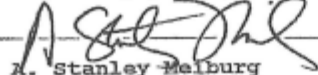
1. EPR shall continuously monitor and record:
 - a) the pressure drop across the wet gas scrubber (WGS),
 - b) the scrubber liquid to gas ratio (L/G), and
 - c) the effluent temperature immediately downstream of the demister section of the control device.
2. EPR is required to determine when excess emissions occur and to submit quarterly reports of those excess emissions.
3. The baseline values of the operating parameters identified in Condition No. 1, above shall be established during the performance test required per Special Provision 8, in Permit C-18897.
4. For the purposes of reporting excess emissions pursuant to Condition No. 2, above, excess emissions are defined as any three-hour period during which any operating parameter is greater than the baseline value established pursuant to Condition No. 3, above.

Copied to Air Dist. 2/24/92.

This approval is limited to EPR's request to amend their construction permit, C-18897, for the modified fluid catalytic cracking unit as referenced in its letter dated March 22, 1991.

If you have any questions or need any additional information, please contact Mr. Edward Washington of my staff at (FTS) 255-7229.

Sincerely yours,



A. Stanley Melburg
Director
Air, Pesticides & Toxics Division (6T)

Enclosure

cc: William G. Laxton
Director
Technical Support Division (MD-14)

Robert Brewer, Director
Quality Assurance Division
Texas Air Control Board, Austin

Don Fine, Permit Engineer
Permits Division
Texas Air Control Board, Austin

Archie Clouse, Director
Region 11
Texas Air Control Board, El Paso



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 Elm Street, Suite 500
Dallas, TX 75270-2102

JUL 01 2019

Received

JUL 10 2019
Environmental
Department

Mr. Kevin Adams
Superintendent, Environmental Engineering
Marathon El Paso Refinery
212 N. Clark Street
El Paso, TX 79905

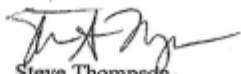
RE: Alternative Monitoring Plan (AMP) – New Source Performance Standards (NSPS) for Petroleum Refineries (40 CFR Part 60 Subparts J and Ja) and National Emission Standards for Hazardous Air Pollutants (NESHAP) for Petroleum Refineries (40 CFR Part 63 Subpart UUU) – Parametric Monitoring In lieu of Continuous Opacity Monitoring System for Fluidized Catalytic Cracking Unit Wet Gas Scrubber at the El Paso Refinery (*formerly owned by Western Refining Company L.P.*), located in El Paso, Texas.

Dear Mr. Adams:

This letter is in response to your request dated December 11, 2018, pertaining to a prior AMP approval for the Fluidized Catalytic Cracking Unit (FCCU) Wet Gas Scrubber (WGS) subject to NSPS Subpart J. You have requested that we update the AMP approval to include opacity monitoring requirements at 40 C.F.R. § 63.1573(g), since the facility is also subject to NESHAP Subpart UUU. Upon review of all available information, the United States Environmental Protection Agency (EPA) approves your AMP request for the FCCU WGS, as delineated fully in the enclosure to this letter.

If operations change from those represented in the enclosure for the FCCU operations at the El Paso Refinery, this approval may become void and a new AMP request will be necessary. If you have any questions or concerns about this approval, please contact Prince Nfodzo of my staff at nfodzo.prince@epa.gov, or at 214-665-7491.

Sincerely,


Steve Thompson
Chief,
Air Enforcement Branch

Enclosure

cc: Michael De La Cruz, Manager, Air Enforcement Section, Enforcement Division
Office of Compliance & Enforcement
Texas Commission on Environmental Quality
P.O. Box 13087, Austin, TX 78711-3087

cc: Maria Malave (OECA), Malave.Maria@epa.gov
Brenda Shine (OAQPS), Shine.Brenda@epa.gov

ENCLOSURE

Marathon El Paso Refinery Modified Alternative Monitoring Plan (AMP) for FCCU WGS Parametric Monitoring in Lieu of COMS

BACKGROUND INFORMATION

Marathon (formerly Western Refining Company L.P.) has proposed modifications to EPA's prior approval of an alternative monitoring plan (AMP) for the FCCU WGS at the El Paso Refinery ("MER"), in consideration of applicable rule subpart changes. This Enclosure provides EPA's evaluation of the current operational status and rule requirement implementation for the WGS, where parametric monitoring is proposed in lieu of continuous opacity monitoring system (COMS) requirements. Since MER needs to comply with Opacity and Particulate Matter (PM) emission limitations under NSPS Part 60 Subparts J ("Refinery NSPS") and NESHAP Part 63 Subpart UUU ("Refinery MACT II"), an AMP is necessary to address the issue of reliability for monitoring opacity when moisture levels are high in a stack.

TECHNICAL INFORMATION FOR AMP APPROVAL

The WGS *Liquid-to-Gas Ratio* ("L/G Ratio") is one critical operating parameter to be monitored for ensuring scrubber performance in all the scrubber designs evaluated across the refinery sector. Although the L/G Ratio involves measurement of both the total liquid flow rate to the scrubber and the total gas flow rate through the scrubber, EPA views the L/G Ratio as a single operating parameter for compliance monitoring. Historically, pressure drop had been used as a critical operating parameter for venturi type scrubbers in addition to the L/G Ratio, since pressure drop had been shown to correlate directly with scrubber efficiency. However, as scrubber designs evolved to meet the needs of multiple pollutant removal and/or flexibility in site-specific process operations, pressure drop became a redundant parameter for monitoring compliance in some scrubber systems.

Ultimately, the final selection of critical operating parameters is entirely dependent upon ensuring that effective scrubber performance is maintained and that emission limitations are continually met, given those needs associated with facility-specific operations of the FCCU Catalyst Regenerator and the WGS type configuration. Through initial and subsequent performance testing, operating parameter limits ("OPLs") are established either as a minimum, average, or maximum value over time intervals for reporting that are recognized as representative of the performance testing conducted to demonstrate compliance with emission limitations.

Specifically, MER proposed the following set of OPLs to ensure that the WGS would function as intended and that emissions from the FCCU Regenerator would continuously meet the regulatory requirements for opacity and particulate matter:

1. Minimum Liquid-to-Gas Ratio (L/G): defined as total liquid flowrate (L) divided by total gas flowrate (G) through the WGS.
2. Minimum pressure drop across the WGS (ΔP).

PROVISIONS FOR MODIFIED AMP

MER has requested modifying the prior EPA approved AMP for the FCCU WGS opacity parametric monitoring under NSPS Subpart J to cover opacity monitoring requirements under the

Refinery MACT UUU regulations, and to revise the parameters that are monitored. MER provided test results for performance tests conducted at the FCCU WGS March 29-30, 2006 and December 1-2, 2016.

EPA has reviewed MER's request and performance test results and approves the following OPLs.

1. **Minimum Liquid-to-Gas Ratio (L/G):** The minimum L/G ratio shall be 19.3 GPM/CFM.
2. **Minimum pressure drop across the WGS (ΔP):** The minimum ΔP shall be 0.50 psig

Compliance for the above OPLs is determined on an hourly rolling average based on evaluation of results from three one-hour test runs, consistent with the FCCU operating conditions and corresponding test data from the most recent particulate matter performance test. Any parameter values that are less than the approved cut-off levels represent and shall be reported as a deviation. MER shall incorporate the terms of this AMP approval into the facility's New Source Review (NSR) and Title V permits for federal enforceability.

As per the requirements at 40 CFR § 63.1571(a)(5), MER shall conduct performance tests at least once every five years to verify that the established values for OPLs are still representative of facility operations and WGS performance, or to determine new representative values. A copy of each performance test report must be submitted to EPA and the permitting authority, along with any changes to the prior OPL values resulting from the data obtained during testing at the FCCU WGS.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1201 Elm Street, Suite 500
Dallas, TX 75270-2102

JUL 01 2019

Received

JUL 10 2019
Environmental
Department

Mr. Kevin Adams
Superintendent, Environmental Engineering
Marathon El Paso Refinery
212 N. Clark Street
El Paso, TX 79905

RE: Alternative Monitoring Plan (AMP) – New Source Performance Standards (NSPS) for Petroleum Refineries (40 CFR Part 60 Subparts J and Ja) and National Emission Standards for Hazardous Air Pollutants (NESHAP) for Petroleum Refineries (40 CFR Part 63 Subpart UUU) – Parametric Monitoring In lieu of Continuous Opacity Monitoring System for Fluidized Catalytic Cracking Unit Wet Gas Scrubber at the El Paso Refinery (*formerly owned by Western Refining Company L.P.*), located in El Paso, Texas.

Dear Mr. Adams:

This letter is in response to your request dated December 11, 2018, pertaining to a prior AMP approval for the Fluidized Catalytic Cracking Unit (FCCU) Wet Gas Scrubber (WGS) subject to NSPS Subpart J. You have requested that we update the AMP approval to include opacity monitoring requirements at 40 C.F.R. § 63.1573(g), since the facility is also subject to NESHAP Subpart UUU. Upon review of all available information, the United States Environmental Protection Agency (EPA) approves your AMP request for the FCCU WGS, as delineated fully in the enclosure to this letter.

If operations change from those represented in the enclosure for the FCCU operations at the El Paso Refinery, this approval may become void and a new AMP request will be necessary. If you have any questions or concerns about this approval, please contact Prince Nfodzo of my staff at nfodzo.prince@epa.gov, or at 214-665-7491.

Sincerely,

Steve Thompson
Chief,
Air Enforcement Branch

Enclosure

cc: Michael De La Cruz, Manager, Air Enforcement Section, Enforcement Division
Office of Compliance & Enforcement
Texas Commission on Environmental Quality
P.O. Box 13087, Austin, TX 78711-3087

cc: Maria Malave (OECA), Malave.Maria@epa.gov
Brenda Shine (OAQPS), Shine.Brenda@epa.gov

ENCLOSURE
Marathon El Paso Refinery
Modified Alternative Monitoring Plan (AMP) for
FCCU WGS Parametric Monitoring in Lieu of COMS

BACKGROUND INFORMATION

Marathon (formerly Western Refining Company L.P.) has proposed modifications to EPA's prior approval of an alternative monitoring plan (AMP) for the FCCU WGS at the El Paso Refinery ("MER"), in consideration of applicable rule subpart changes. This Enclosure provides EPA's evaluation of the current operational status and rule requirement implementation for the WGS, where parametric monitoring is proposed in lieu of continuous opacity monitoring system (COMS) requirements. Since MER needs to comply with Opacity and Particulate Matter (PM) emission limitations under NSPS Part 60 Subparts J ("Refinery NSPS") and NESHAP Part 63 Subpart UUU ("Refinery MACT II"), an AMP is necessary to address the issue of reliability for monitoring opacity when moisture levels are high in a stack.

TECHNICAL INFORMATION FOR AMP APPROVAL

The WGS *Liquid-to-Gas Ratio* ("L/G Ratio") is one critical operating parameter to be monitored for ensuring scrubber performance in all the scrubber designs evaluated across the refinery sector. Although the L/G Ratio involves measurement of both the total liquid flow rate to the scrubber and the total gas flow rate through the scrubber, EPA views the L/G Ratio as a single operating parameter for compliance monitoring. Historically, pressure drop had been used as a critical operating parameter for venturi type scrubbers in addition to the L/G Ratio, since pressure drop had been shown to correlate directly with scrubber efficiency. However, as scrubber designs evolved to meet the needs of multiple pollutant removal and/or flexibility in site-specific process operations, pressure drop became a redundant parameter for monitoring compliance in some scrubber systems.

Ultimately, the final selection of critical operating parameters is entirely dependent upon ensuring that effective scrubber performance is maintained and that emission limitations are continually met, given those needs associated with facility-specific operations of the FCCU Catalyst Regenerator and the WGS type configuration. Through initial and subsequent performance testing, operating parameter limits ("OPLs") are established either as a minimum, average, or maximum value over time intervals for reporting that are recognized as representative of the performance testing conducted to demonstrate compliance with emission limitations.

Specifically, MER proposed the following set of OPLs to ensure that the WGS would function as intended and that emissions from the FCCU Regenerator would continuously meet the regulatory requirements for opacity and particulate matter:

1. Minimum Liquid-to-Gas Ratio (L/G): defined as total liquid flowrate (L) divided by total gas flowrate (G) through the WGS.
2. Minimum pressure drop across the WGS (ΔP).

PROVISIONS FOR MODIFIED AMP

MER has requested modifying the prior EPA approved AMP for the FCCU WGS opacity parametric monitoring under NSPS Subpart J to cover opacity monitoring requirements under the

Refinery MACT UUU regulations, and to revise the parameters that are monitored. MER provided test results for performance tests conducted at the FCCU WGS March 29-30, 2006 and December 1-2, 2016.

EPA has reviewed MER's request and performance test results and approves the following OPLs.

1. **Minimum Liquid-to-Gas Ratio (L/G):** The minimum L/G ratio shall be 19.3 GPM/CFM.
2. **Minimum pressure drop across the WGS (ΔP):** The minimum ΔP shall be 0.50 psig

Compliance for the above OPLs is determined on an hourly rolling average based on evaluation of results from three one-hour test runs, consistent with the FCCU operating conditions and corresponding test data from the most recent particulate matter performance test. Any parameter values that are less than the approved cut-off levels represent and shall be reported as a deviation. MER shall incorporate the terms of this AMP approval into the facility's New Source Review (NSR) and Title V permits for federal enforceability.

As per the requirements at 40 CFR § 63.1571(a)(5), MER shall conduct performance tests at least once every five years to verify that the established values for OPLs are still representative of facility operations and WGS performance, or to determine new representative values. A copy of each performance test report must be submitted to EPA and the permitting authority, along with any changes to the prior OPL values resulting from the data obtained during testing at the FCCU WGS.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

NOV 12 2019

Received
NOV 19 2019
Environmental
Department

Mr. Kevin Adams,
Superintendent Environmental Engineer
Western Refining
212 N Clark St.
El Paso, Texas 79905

RE: Performance Test Waiver and Alternative Monitoring Request

40 CFR Part 60 Subparts NNN and RRR - Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations (Subpart NNN) and Reactor Processes (Subpart RRR)

Western Refining El Paso Refinery, Distillation Unit Vents at the El Paso Refinery located in El Paso, Texas.

Dear Mr. Adams:

This letter is in response to your request dated January 17, 2018, for the above referenced waiver and alternative monitoring under New Source Performance Standards (NSPS). As delineated below, we are approving your request for meeting Subpart RRR in lieu of Subpart NNN requirements for testing, monitoring, reporting and record-keeping, *related specifically to the use of boilers, process heaters, and flares* for compliance with the standards of both Subparts.

In your letter, you requested to substitute NSPS RRR requirements in lieu of requirements for NSPS NNN as an alternative flow and temperature monitoring for the vent streams associated with the following distillation units process vents:

C-550 De-butanizer (Light ends Recovery Unit)
F-1306 De-butanizer (South Fluidized Catalytic Cracking Unit)
F-801 De-isobutanizer (South Alky Units No. 1 and 2)
F-802 De-propanizer (South Alky Units No. 1 and 2)
F-803 De-butanizer (South Alky Units No. 1 and 2)
F-7107 Stabilizer (South Butamer Unit)

You also requested a waiver of the NSPS performance testing requirement for the following boilers and furnaces due to the off gas from the distillation units being burned as primary fuel:

Boiler No. 1 (H-901)
Boiler No. 3 (H-903)
No. 11 Boiler

pag 3.

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Boiler F-1013
CPS Crude Heater (H-103)
Vacuum Unit Heater (H-1601)
Vacuum Preflash Heater (H-1101)
CGHT First Stage Heater
CGHT Second Stage Heater
CGHT Stabilizer Reboiler
No. 6 Crude Unit Furnace 1
No. 6 Crude Unit Furnace 2
Rheniformer Reactor Furnace (F-4150)
Rheniformer Reactor Furnace (F-4160)
Rheniformer Reactor Furnace (F-4170)
Rheniformer Reactor Furnace (F-4180)
Plant 39 Diesel Furnace
Plant 39 Furnace

Your letter indicates that these distillation units' off gas is normally routed to the fuel gas system, where it is burned as a primary fuel in combination with other refinery fuel gas and natural gas. Our understanding is that the fuel gas system is comprised of boilers and process heaters, all with heat input capacities less than 150 one million British Thermal Units per hour (MMBTU/hr). Vent gases mixed with refinery fuel and natural gas constitute the primary fuel for these boiler or furnace units and are introduced into the flame zone of each unit. In addition, none of the distillation vents are equipped with a bypass directly to the atmosphere.

The United States Environmental Protection Agency (EPA) hereby approves your request to waive the initial performance test for those vents specified in your letter as being *introduced with the primary fuel* into a boiler or process heater in accordance with 40 CFR §60.8(b), and as provided for in §60.704(b)(5). Furthermore, EPA approves your request to implement the Subpart RRR monitoring provisions in lieu of complying with the monitoring provisions of 40 CFR §60.663(b) and 40 CFR §60.663(c) under Subpart NNN. Finally, EPA approves your request to comply with the reporting and recordkeeping requirements of Subpart RRR in lieu of the reporting and recordkeeping requirements of Subpart NNN since these reporting and recordkeeping requirements correspond directly to those monitoring requirements to be implemented for the distillation units process vents under Subpart RRR. Please be advised that you must provide a copy of the schematic required by Subpart RRR §60.705(s) in your initial report to the state agency, and also maintain a copy on site for the life of the system to ensure that the affected vent streams are being routed to appropriate control devices under this approval.

This approval is based upon the information submitted in your request for those units specified and identified within this letter. This approval is consistent with previous determinations made by EPA for Subpart NNN affected facilities. Enclosed, please find our detailed comparison of Subpart NNN and Subpart RRR requirements in relation to your request. If any new information becomes available or process unit operations are changed, this determination may become void and a new determination may be necessary. If you have any

questions or concerns about this determination, please contact Mr. Justin Chen of my staff at (214) 665-2273, or at chen.justin@epa.gov.

Sincerely,



Steve Thompson
Chief
Air Enforcement Branch

Enclosure

cc: Lorinda Gardner
Regional Director
TCEQ Region 6 Office
401 East Franklin, Suite 560
El Paso, Texas 79901

Enclosure
Comparison of 40 CFR Subparts NNN and RRR
For
Flares and Boilers/Process Heaters

The performance standards of §60.662 (Subpart NNN) and §60.702 (Subpart RRR) are established to minimize the emissions of volatile organic compounds (VOC) through the application of best demonstrated technology (BDT). Therefore, different technology controls have different testing, monitoring, and reporting requirements.

When a flare is used to seek compliance with either §60.662(b) or §60.702(b), both Subparts NNN and RRR require that the flare meet the requirements of §60.18 (see same requirement under testing at §60.664(d) and §60.704(c)). Monitoring requirements are similar, except Subpart RRR includes monitoring flow diverted *from the flare to the atmosphere* via a bypass line (see §60.703 (b)(2)) while Subpart NNN requirements include monitoring vent streams *routed to each flare* prior to being combined with other gases (see §60.662 (b)(2)). Therefore, Subpart RRR requires recording the flow rate more frequently (every 15 minutes) than Subpart NNN (every hour).

When a boiler or process heater is used to seek compliance with §60.662(a) and §60.702(a), the testing, monitoring, and recordkeeping requirements differ between Subparts NNN and RRR. EPA's rationale for waiving performance testing, temperature monitoring, and for refining the location and monitoring of flow indicators can be found on pages 45957 through 45959 in the Federal Register preamble to NSPS Subpart RRR (58 FR 45948 August 31, 1993). In general, Subpart RRR provides consideration of vent gases that are mixed with other gaseous streams and used as a *primary fuel* for the boiler(s) or process heater(s) whereas Subpart NNN does not address such primary fuel systems. Also, Subpart RRR addresses vent gas flows diverted *away from* a boiler(s) or process heater(s) via a bypass line(s) to the atmosphere whereas Subpart NNN merely addresses vent gases as *routed to* boilers or process heaters. For this reason, Subpart RRR requires recording the flow rate more frequently (every 15 minutes) in comparison to Subpart NNN (every hour). Specific citation comparisons are relevant as follows:

Specific to testing, both Subpart NNN §60.664(b)(5) and Subpart RRR §60.704(b)(5) waive the initial performance test requirement when a boiler or process heater with a design heat input capacity of 150 MBtu/hour or greater is used to comply with §60.662(a) and 60.702(a), respectively. Subpart RRR §60.704(b)(5) also waives the requirement for an initial performance test when a vent stream is *introduced with the primary fuel* into a boiler or process heater, regardless of heat input capacity.

Specific to monitoring, both Subpart NNN §60.663(c) and Subpart RRR §60.703(c) outline requirements for locating and monitoring vent gas flow indicators as well as monitoring firebox temperature. However, Subpart RRR §60.703(c)(1)(ii) waives the need for a flow indicator where bypass line valves to the atmosphere are secured in a

closed position with a lock-and-key type configuration. Also, Subpart RRR §60.703(c)(2) exempts the temperature monitoring requirement for any vent stream *introduced with the primary fuel* into a boiler or process heater.

Since Subpart RRR provides some relief in testing and monitoring requirements in comparison to Subpart NNN, as discussed above, an additional reporting requirement was deemed necessary. In order to ensure that the affected vent streams are being routed to appropriate control devices, Subpart RRR §60.705(s) requires that the facility maintain on file a schematic diagram of the affected vent streams, collection system(s), fuel systems, control devices, and bypass systems as part of the initial report submitted in accordance with §60.705(b). This additional reporting requirement (not required in Subpart NNN) is further discussed in the Federal Register preamble referenced above.



000988



VIA CERTIFIED MAIL
No. 7016 0910 0000 9552 4038

January 17, 2018

Ms. Cheryl Seager
Compliance Assurance and Enforcement Division
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Re: *Alternative Monitoring Plan Request*
40 CFR Part 60 Subpart NNN

Dear Mr. Blevins:

The Western Refining Company, L.P. (Western) is submitting this request for an alternative monitoring plan (AMP) for New Source Performance Standards (NSPS) under 40 CFR Part 60, Subpart NNN (*Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations*). For NSPS NNN affected facilities at the El Paso Refinery, Western proposes to use the NSPS RRR monitoring, recordkeeping, and reporting requirements related specifically to use of boilers, process heaters, and flares for compliance with NSPS NNN.

1. BACKGROUND

Western owns and operates a petroleum refinery in El Paso, Texas (El Paso Refinery). Western operates numerous distillation units at the El Paso Refinery. Some distillation may be subject to the requirements of New Source Performance Standards (NSPS) under 40 CFR Part 60, Subpart NNN (*Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations*). The process vents from the distillation units are routed to the refinery fuel gas system and then combusted in the process heaters and boilers at the refinery. The refinery fuel gas system is also connected to the refinery flares, which act as emergency back-up control devices in the event the vent stream is diverted from the refinery fuel gas system. As a result, consistent with previous determinations made by the United States Environmental Protection Agency (EPA) for NSPS NNN affected facilities, Western proposes to use the NSPS RRR monitoring, recordkeeping, and reporting requirements related specifically to use of boilers, process heaters, and flares for compliance with NSPS NNN.

2. AFFECTED FACILITIES UNDER NSPS NNN

Western has developed a methodology for determining the affected facilities under NSPS NNN. In addition, it is Western's understanding that the distillation unit only includes the equipment where the distillation process occurs. Based on the determination method developed by Western, the following is a list of affected facilities under NSPS NNN:

Air.1.C.17.a.2

212 N. Clark Street, El Paso, Texas 79905 • 915 775-3300 • www.wnr.com

- At the Light Ends Recovery (LER) Unit: C-550 Debutanizer
- At the South Fluidized Catalytic Cracking (FCCU) Unit: F-1306 Debutanizer
- At the South Alky Units No. 1 and 2:
 - F-802 Depropanizer
 - F-801 Deisobutanizer
 - F-803 Debutanizer
- At the South Butamer Unit: F-7107 Stabilizer

3. ALTERNATIVE MONITORING PLAN FOR PROCESS HEATERS AND BOILERS

Under NSPS NNN, a flow indicator that provides a record of the vent stream flow to a boiler or process heaters at least once every hour for each affected facility or distillation unit is required per 40 CFR §60.663(c)(1). In addition, per 40 CFR §60.663(c)(2), a temperature monitoring device in the firebox with a continuous recorder is required for a vent stream that is combusted in a boiler or process heater with a design capacity of less than 150 MMBtu/hr.

As an alternative to the above monitoring provisions in NSPS NNN, Western is proposing to use the monitoring procedures in NSPS RRR. The proposed alternative procedures are found in 40 CFR §60.703(c). For boilers/process heaters monitoring, 40 CFR §60.703(c)(1) requires that a flow indicator be installed in order to provide a record of the periods when emissions are diverted from the boiler or process heater, except where the bypass line valve is secured in the closed position with a car-seal or a lock-and-key type configuration. Western is proposing to maintain car-seals on the bypass line valves at the affected facilities. Therefore, per 40 CFR §60.703(c)(1)(ii), a flow indicator is not required in this case.

It is Western's understanding that a vent stream discharging from a pressure relief valve (PRV) resulting from a startup, shutdown or malfunction event is not subject to NSPS NNN or NSPS RRR per the definition of a "vent stream" specified in 40 CFR §60.661 and 40 CFR §60.701, as well the General Provisions specified in 40 CFR §60.8(c). Therefore, it is Western's understanding that PRVs do not qualify as bypass line valves and are exempt from both NSPS NNN and RRR.

Also, 40 CFR §60.703(c)(2) requires the installation of combustion temperature monitoring equipment on boilers and process heaters that have a heat input capacity of less than 150 MMBtu/hr unless the vent stream is introduced with the primary fuel in the boiler or process heater. Since the vent streams from Western's distillation operations and reactor processes are introduced in the boilers or process heaters with the primary fuel (refinery fuel gas as well as natural gas), combustion temperature monitoring would not be required under the proposed alternative monitoring plan.

Pursuant to 40 CFR §60.13(i), and consistent with previous determinations made by the EPA for NSPS NNN affected facilities, Western hereby requests approval of monitoring provisions of NSPS RRR as an alternative to the monitoring provisions of NSPS NNN as described above for boilers/heaters. In addition, due to Western's proposal to maintain car-seals on the bypass lines valves at the affected facilities, no flow indicators will be required. Western is also requesting approval of the corresponding

recordkeeping and reporting requirements in 40 CFR §§60.705(d)(2), (l)(2) and (l)(7) of NSPS RRR in lieu of the recordkeeping and reporting provisions of NSPS NNN. Based on this request, the following NSPS NNN requirements will be replaced by NSPS RRR requirements and no longer apply to the Western El Paso Refinery:

- NSPS NNN monitoring provisions
 - 40 CFR §60.663(c)
 - 40 CFR §60.663(c)(1)
 - 40 CFR §60.663(c)(2)
- NSPS NNN recordkeeping provisions
 - 40 CFR §60.665(d)
- NSPS NNN reporting provisions
 - 40 CFR §60.665(l)(2)

Western is requesting to comply with the following requirements under NSPS RRR:

- NSPS RRR monitoring provisions
 - 40 CFR §60.703(c)
 - 40 CFR §60.703(c)(1)(ii)
- NSPS RRR monitoring and recordkeeping provisions
 - 40 CFR §60.703(c)(2) (for boilers and process heaters with a heat input capacity of less than 150 MMBtu/hr)
- NSPS RRR recordkeeping provisions
 - 40 CFR §60.705(d)(2)
 - 40 CFR §60.705(l)(2)
 - 40 CFR §60.705(l)(7)

4. ALTERNATIVE MONITORING PLAN FOR FLARES

For NSPS NNN compliance using a flare, a flow indicator that provides a record of vent stream flow to the flare at least once every hour is required per 40 CFR §60.663(b). As an alternative to the flow monitoring provisions in NSPS NNN, Western is proposing to use the monitoring procedures in NSPS RRR. The proposed alternative procedures are found in 40 CFR §60.703(b). For flare monitoring, 40 CFR §60.703(b) requires a flow indicator that provides a record of vent stream flow diverted from being routed to the flare at least once every 15 minutes for each affected facility, except where the bypass line valve is secured in the closed position with a car-seal or a lock-and-key type configuration. Western proposes to maintain car-seals on the bypass line valves at the affected facilities. Therefore, per 40 CFR §60.703(b)(2)(ii), a flow indicator is not required in this case.

It is Western's understanding that a vent stream discharging from a pressure relief valve (PRV) resulting from a startup, shutdown or malfunction event is not subject to NSPS NNN or NSPS RRR per the definition of a "vent stream" specified in 40 CFR §60.661 and 40 CFR §60.701, as well the General Provisions specified in 40 CFR §60.8(c). Therefore, it is Western's understanding that PRVs do not qualify as bypass line valves and are exempt from both NSPS NNN and RRR.

Pursuant to 40 CFR §60.13(i), Western hereby requests approval of the monitoring provisions of NSPS RRR as an alternative to the monitoring provisions of NSPS NNN as described above for flares. In addition, due to Western's proposal to maintain car-seals on the bypass lines valves at the affected facilities, no flow indicators will be required. Western is also requesting approval of corresponding recordkeeping and reporting requirements in 40 CFR §§60.705 (d)(2), (l)(2) and (l)(7) of NSPS RRR in lieu of the recordkeeping and reporting provisions of NSPS NNN. Based on this request, the following NSPS NNN requirements will be replaced by NSPS RRR requirements and no longer apply to the Western El Paso Refinery:

- NSPS NNN monitoring provisions
 - 40 CFR §60.663(b)
 - 40 CFR §60.663(b)(1)
 - 40 CFR §60.663(b)(2)
- NSPS NNN recordkeeping provisions
 - 40 CFR §60.665(d)
- NSPS NNN reporting provisions
 - 40 CFR §60.665(l)(2)

Western is requesting to comply with the following requirements under NSPS RRR:

- NSPS RRR monitoring provisions
 - 40 CFR §60.703(b)
 - 40 CFR §60.703(b)(1)
 - 40 CFR §60.703(b)(2)(ii)
- NSPS RRR recordkeeping provisions
 - 40 CFR §60.705(d)(2)
- NSPS RRR reporting provisions
 - 40 CFR §60.705(l)(2)
 - 40 CFR §60.705(l)(7)

5. PERFORMANCE TEST WAIVER REQUEST

Under NSPS NNN 40 CFR §60.664(a)-(c), an initial performance test is required when a boiler or process heater with a design heat input capacity of less than 44 MW (150 MMBtu/hr) is used for NSPS NNN compliance purposes. However, per 40 CFR §60.704(b)(5)(ii) in NSPS RRR, a performance test is waived for process vent streams introduced into boilers or process heaters with the primary fuel. As noted previously, the vent streams from Western's distillation operations are mixed with other hydrocarbon streams to form the primary fuel for the refinery's boilers and process heaters. Therefore, consistent with previous determinations made by the EPA for NSPS NNN affected facilities, and per 40 CFR §60.8(b), Western is requesting a performance test waiver for the boilers and process heaters where distillation process vent streams are introduced with the primary fuel.

Page 5 of 5 – January 17, 2018
Mr. John Blevins – U.S. EPA Region 6

If you have any questions or require any clarification, please feel free to contact Sean Woodard at (915) 771-5110 or by e-mail at Christopher.S.Woodard@andeavor.com.

Sincerely,



Kevin M. Adams
Environmental Manager

cc: Ms. Lorinda Gardner
Regional Director
TCEQ Region 6 Office
401 East Franklin, Suite 560
El Paso, Texas 79901

Certified Mail
No. 7016 0340 0000 6251 9118

Air.1.C.17.a.2