

Ryan Glaze

From: Laura Cottrell <lcottrell@cyrusone.com>
Sent: Sunday, December 7, 2025 1:09 PM
To: Ryan Glaze; Rachel Korenek; Luisa Martin
Cc: Kelli Lynn Deuth; David Henderson; Stephanie Carcieri
Subject: Re: [External Message]RE: Working Draft Permit -- FOP O4793/Project 38609, CyrusOne LLC/SAT1

Hi Ryan, to close the loop on this, we completed the submittal in STEERS on Friday the 5th. Can you let us know when the public comment period will begin?

Please let us know if you need anything else from us.

Thanks,

Laura Cottrell

Director, Environmental Compliance

m: 603-793-0534

cyrusone.com



From: Ryan Glaze <James.Glaze@tceq.texas.gov>
Sent: Tuesday, December 2, 2025 4:50 PM
To: Rachel Korenek <rkorenek@ramboll.com>; Luisa Martin <lmartin@ramboll.com>
Cc: Laura Cottrell <lcottrell@cyrusone.com>; Kelli Lynn Deuth <kdeuth@ramboll.com>; David Henderson <dhenderson@cyrusone.com>; Stephanie Carcieri <SCARCIERI@ramboll.com>
Subject: [External Message]RE: Working Draft Permit -- FOP O4793/Project 38609, CyrusOne LLC/SAT1

Good afternoon,

Yes, that will be fine. The new deadline will be December 5, 2025.

Please let me know if you have any questions.

Thanks,

Ryan Glaze

Operating Permits Section

Air Permits Division

Texas Commission on Environmental Quality

P.O. Box 13087 MC 163

Austin, TX, 78711

(512) 239-6212



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

From: Rachel Korenek <RKORENEK@ramboll.com>
Sent: Tuesday, December 2, 2025 3:41 PM
To: Ryan Glaze <James.Glaze@tceq.texas.gov>; Luisa Martin <LMARTIN@ramboll.com>
Cc: lcottrell <lcottrell@cyrusone.com>; Kelli Lynn Deuth <kdeuth@ramboll.com>; dhenderson@cyrusone.com; Stephanie Carcieri <SCARCIERI@ramboll.com>
Subject: RE: Working Draft Permit -- FOP O4793/Project 38609, CyrusOne LLC/SAT1

Hi Ryan,

Could we get an extension for this until Friday (12/5)? We are having some STEERS access issues for our signatory that we are working to resolve but it takes time.

Please reach out if you have any questions.

Thanks!

Rachel Korenek (she/her)

Classification: Confidential

From: Ryan Glaze <James.Glaze@tceq.texas.gov>
Sent: Thursday, November 20, 2025 8:27 AM
To: Luisa Martin <LMARTIN@ramboll.com>
Cc: lcottrell <lcottrell@cyrusone.com>; Kelli Lynn Deuth <kdeuth@ramboll.com>; dhenderson@cyrusone.com; Steven Stump <sstump@cyrusone.com>; Rachel Korenek <RKORENEK@ramboll.com>; Stephanie Carcieri <SCARCIERI@ramboll.com>
Subject: RE: Working Draft Permit -- FOP O4793/Project 38609, CyrusOne LLC/SAT1

Good morning Luisa,

Thank you for providing a response to my questions. I have provided the updated Working Draft Permit that includes 30 TAC Chapter 111 requirements (Special Term and Condition No. 3).

I have completed the review of this SOP-Initial permit application and request that a final Form OP-CRO1 be submitted in STEERS.

In the time period section on Form OP-CRO1 please put the start date as August 8, 2025 and for the end date November 20, 2025.

Please have Form OP-CRO1 submitted in STEERS by **December 3, 2025** at the latest.

Please let me know if you have any questions.

Thanks,

Ryan Glaze

Operating Permits Section

Air Permits Division

Texas Commission on Environmental Quality

P.O. Box 13087 MC 163

Austin, TX, 78711
(512) 239-6212



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

From: Luisa Martin <LMARTIN@ramboll.com>
Sent: Wednesday, November 19, 2025 2:57 PM
To: Ryan Glaze <James.Glaze@tceq.texas.gov>
Cc: Icottrell <lcottrell@cyrusone.com>; Kelli Lynn Deuth <kdeuth@ramboll.com>; dhenderson@cyrusone.com; Steven Stump <sstump@cyrusone.com>; Rachel Korenek <RKORENEK@ramboll.com>; Stephanie Carcieri <SCARCIERI@ramboll.com>
Subject: RE: Working Draft Permit -- FOP O4793/Project 38609, CyrusOne LLC/SAT1

Hi Ryan,

Thank you for providing these updates and answer to our question. See our responses below:

Form OP-REQ1 page 1

- After revisiting the form instructions, CyrusOne would like to change the response to Question 4 to "no"; we understand that unit-level reporting isn't required for our source type. We will update the documentation on our end. Please update the draft permit accordingly.

Form OP-REQ2

Thank you for letting us know, we will update our records accordingly.

Please let me know if anything else is needed at this time.

Thank you,

Luisa Martin

Lead Consultant, Air and Climate Management

D +1 713-579-1797

lmartin@ramboll.com

Classification: Confidential

From: Ryan Glaze <James.Glaze@tceq.texas.gov>
Sent: Monday, November 10, 2025 2:30 PM
To: Rachel Korenek <RKORENEK@ramboll.com>; Luisa Martin <LMARTIN@ramboll.com>
Cc: Icottrell <lcottrell@cyrusone.com>; Kelli Lynn Deuth <kdeuth@ramboll.com>; dhenderson@cyrusone.com; Steven Stump <sstump@cyrusone.com>
Subject: RE: Working Draft Permit -- FOP O4793/Project 38609, CyrusOne LLC/SAT1

Good afternoon,

I have an additional question that requires a response. Based on the response, it will change the contents of the Working Draft Permit (WDP).

Form OP-REQ1 page 1

- Section I, Subsubsection A., Question 2 is answered "YES" documenting that the site has stationary vents with a flow rate less than 100,000 actual cubic feet per minute that were constructed after 01/31/1972. Additionally, question 4 is marked as "YES" documenting that all the vents are

addressed on a unit specific basis on Forms OP-SUM and OP-UA15. However, no units were submitted on Form OP-UA15 documenting 30 TAC Chapter 111 § 111.111(a)(1)(B) applicability.

- Please provide Forms OP-SUM and OP-UA15 for units subject to 30 TAC Chapter 111 or change the response to Form OP-REQ1 page 1 Section I, Subsection A, Question 4 to “NO”.
- If the site would like to change the response to question 4 on Form OP-REQ1 page 1 to “NO”, only confirmation through email would be necessary. Units subject to 30 TAC Chapter 111 § 111.111(a)(1)(B) will have their own permit term. Please update Form OP-REQ1 for your records.

Below is a change I made to the contents of the permit shields. This will require no updates on the site’s part.

Form OP-REQ2

- I have modified the negative applicability reasoning for NSPS Ka, Kb, and Kc to “All tanks were Constructed/Reconstructed/Modified after...” to better reference the citation text.

Question received on October 30, 2025

- TCEQ response: Once RRT has developed the pending Bexar County NOx RACT requirements, the site can submit them in a Permit Revision application or when the next renewal application.

Please let me know what the site’s decision on Form OP-REQ1 page 1 is by **November 21, 2025** at the latest.

Please let me know if you have any questions.

Thanks,

Ryan Glaze

Operating Permits Section

Air Permits Division

Texas Commission on Environmental Quality

P.O. Box 13087 MC 163

Austin, TX, 78711

(512) 239-6212



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

From: Rachel Korenek <RKORENEK@ramboll.com>

Sent: Thursday, October 30, 2025 10:15 PM

To: Ryan Glaze <James.Glaze@tceq.texas.gov>; Luisa Martin <LMARTIN@ramboll.com>

Cc: lcottrell <lcottrell@cyrusone.com>; Kelli Lynn Deuth <kdeuth@ramboll.com>; dhenderson@cyrusone.com; Steven Stump <sstump@cyrusone.com>

Subject: RE: Working Draft Permit -- FOP O4793/Project 38609, CyrusOne LLC/SAT1

Hi Ryan,

We have reviewed the draft permit and have no comments.

We do have one question as it pertains to the pending Bexar County NOx RACT requirements. If/when these requirements are incorporated into the TAC, how do we address this in the permit? Is CyrusOne required to amend

the permit within a certain time frame or are updates of this nature required to be included in a permit renewal application.

Thank you!

Rachel Korenek (she/her)

Classification: Confidential

From: Ryan Glaze <James.Glaze@tceq.texas.gov>

Sent: Tuesday, October 14, 2025 8:02 AM

To: Luisa Martin <LMARTIN@ramboll.com>

Cc: Rachel Korenek <RKORENEK@ramboll.com>; lcottrell <lcottrell@cyrusone.com>; Kelli Lynn Deuth <kdeuth@ramboll.com>; dhenderson <dhenderson@cyrusone.com>; Steven Stump <ssump@cyrusone.com>

Subject: RE: Working Draft Permit -- FOP O4793/Project 38609, CyrusOne LLC/SAT1

Good morning Luisa,

Thank you for the updated information. I have conducted a technical review of this application and I have attached an electronic copy of the Working Draft Permit (WDP) for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided.

Please review the WDP and submit to me any comments you have regarding it by **October 31, 2025.** Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP. Note that any application updates necessary to make requested changes must accompany the WDP comments.

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, application updates, WDP review and comment procedures.

Please let me know if you have any questions.

Thanks,

Ryan Glaze

Operating Permits Section

Air Permits Division

Texas Commission on Environmental Quality

P.O. Box 13087 MC 163

Austin, TX, 78711

(512) 239-6212



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

From: Luisa Martin <LMARTIN@ramboll.com>

Sent: Monday, October 13, 2025 4:40 PM

To: Ryan Glaze <James.Glaze@tceq.texas.gov>

Cc: Rachel Korenek <RKORENEK@ramboll.com>; lcottrell <lcottrell@cyrusone.com>; Kelli Lynn Deuth <kdeuth@ramboll.com>; dhenderson@cyprusone.com; Steven Stump <sstump@cyrusone.com>

Subject: RE: Technical Review -- FOP O4793/Project 38609, CyrusOne LLC/SAT1

Hello Ryan,

Thank you for your additional feedback. We have updated OP-PBR SUP and OP-REQ2 per your feedback. Please let us know if you have any questions or additional requests.

Thanks!

Luisa Martin

Lead Consultant, Air and Climate Management

D +1 713-579-1797

lmartin@ramboll.com

Classification: Confidential

From: Ryan Glaze <James.Glaze@tceq.texas.gov>

Sent: Tuesday, October 7, 2025 9:11 AM

To: Luisa Martin <LMARTIN@ramboll.com>

Cc: Rachel Korenek <RKORENEK@ramboll.com>; lcottrell <lcottrell@cyrusone.com>; Kelli Lynn Deuth <kdeuth@ramboll.com>; dhenderson@cyprusone.com; Steven Stump <sstump@cyrusone.com>

Subject: RE: Technical Review -- FOP O4793/Project 38609, CyrusOne LLC/SAT1

Good morning Luisa,

Thank you for providing the updated Forms OP-REQ2 and OP-PBR SUP. After reviewing the submitted forms the following updates need to be made.

Form OP-REQ2

The potentially applicable regulatory name for Group ID GRP-GENCRIT1 has been updated for 30 TAC Chapter 117, Subchapter B however, the citation listed is §117.200(3). Citation 117.203(1)(d) seems to be the correct citation based on the negative applicability reasoning provided for Group ID GRP-GENCRIT1. Please confirm if this is correct and update the citation for Group ID GRP-GENCRIT1.

Form OP-PBR SUP

The units listed on Form OP-PBR SUP do not match the Unit IDs listed on Form OP-SUM. According to Form OP-PBR SUP instructions, "Enter the identification number (ID No.) for the emission unit authorized by the registered PBR (maximum 10 characters). If listed on Form OP-SUM (Individual Unit Summary), the ID No. should match". For example, Unit ID ENG1-SAI on Form OP-PBR SUP should be Unit ID GEN A-1 based on what is listed on Form OP-SUM. Please update Form OP-PBR SUP and list the Unit IDs that are on Form OP-SUM.

Please provide these updates by **October 15, 2025** at the latest. Please let me know if you have any questions.

Thanks,

Ryan Glaze

Operating Permits Section

Air Permits Division
Texas Commission on Environmental Quality
P.O. Box 13087 MC 163
Austin, TX, 78711
(512) 239-6212



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

From: Luisa Martin <LMARTIN@ramboll.com>
Sent: Friday, October 3, 2025 2:24 PM
To: Ryan Glaze <James.Glaze@tceq.texas.gov>
Cc: Rachel Korenek <RKORENEK@ramboll.com>; lcottrell <lcottrell@cyrusone.com>; Kelli Lynn Deuth <kdeuth@ramboll.com>; dhenderson@cyrusone.com; Steven Stump <sstump@cyrusone.com>
Subject: RE: Technical Review -- FOP O4793/Project 38609, CyrusOne LLC/SAT1

Hi Ryan,

Thank you for your additional feedback on our application submitted for SOP O4793 on behalf of CyrusOne, LLC for their SAT1 facility.

We have updated OP-PBRSUP and OP-REQ2 per your feedback. Please let us know if you have any questions or additional requests.

Thanks and have a great day!

Luisa Martin

Lead Consultant, Air and Climate Management

D +1 713-579-1797

lmartin@ramboll.com

Classification: Confidential

From: Ryan Glaze <James.Glaze@tceq.texas.gov>
Sent: Monday, September 22, 2025 3:25 PM
To: Luisa Martin <LMARTIN@ramboll.com>
Cc: Rachel Korenek <RKORENEK@ramboll.com>; lcottrell <lcottrell@cyrusone.com>; Kelli Lynn Deuth <kdeuth@ramboll.com>; dhenderson@cyrusone.com; Steven Stump <sstump@cyrusone.com>
Subject: RE: Technical Review -- FOP O4793/Project 38609, CyrusOne LLC/SAT1

Good afternoon,

Thank you for providing the updated information. After further review, additional information needs to be provided.

Form OP-PBRSUP

- In the updated Form OP-PBRSUP Table D, the monitoring and/or recordkeeping requirements is not consistent with the periodic monitoring guidance. Please review my previous email dated August 8, 2025 about Table D monitoring requirements and update the Form OP-PBRSUP form. Note: this needs to be done for PBRs 106.511 and 106.472.
- In addition, the specificity of the monitoring and/or recordkeeping requirements is required to be consistent with the periodic monitoring guidance ([periodicmon.pdf](#)). The language of "CyrusOne established a federally enforceable limit 89.2 tpy NOX..." and the next sentence later "With the

proposed NOX limitation....” seems conflicting. Is the NOx limitation established or proposed? Please review [Form OP-PBR SUP - Instructions](#) page 4 for the instructions of what needs to be documented for monitoring requirements on Table D.

- Since this is the first time Form OP-PBR SUP is being submitted for this permit, all the tables listed in the Form OP-PBR SUP (Tables A – D) need to be included even if those tables are not being used.

Form OP-REQ2

- On the submitted Form OP-REQ2, the Negative Applicability Citation for Group IDs GRP-GENCRIT1, GRP-GENCRIT2, and Unit ID GEN-HOUSE is incorrect. The Citation §117.203(1)(d) is an exemption for “gas-fired lean-burn stationary reciprocating internal combustion engines”. Based on the submitted Form OP-UA2 Unit Attributes and the Negative Applicability Reason on Form OP-REQ2, these engines are diesel-fired engines
- Based on the attributes provided for Group IDs GRP-GENCRIT1, GRP-GENCRIT2, and Unit ID GEN-HOUSE. it appears that the negative applicability citation is §117.200(3). Please confirm if this is correct and submit an updated form OP-REQ2. The negative applicability reason should be based on language from the rule text and the negative applicability citation.

Please have all updated information by **October 3, 2025** at the latest. Please let me know if you have any questions.

Thanks,

Ryan Glaze

Operating Permits Section
Air Permits Division
Texas Commission on Environmental Quality
P.O. Box 13087 MC 163
Austin, TX, 78711
(512) 239-6212



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

From: Luisa Martin <LMARTIN@ramboll.com>
Sent: Wednesday, September 3, 2025 3:54 PM
To: Ryan Glaze <James.Glaze@tceq.texas.gov>
Cc: Rachel Korenek <RKORENEK@ramboll.com>; Laura Cottrell <lcottrell@cyrusone.com>; Kelli Lynn Deuth <kdeuth@ramboll.com>; dhenderson@cyrusone.com; Steven Stump <ssump@cyrusone.com>
Subject: RE: Technical Review -- FOP O4793/Project 38609, CyrusOne LLC/SAT1

Hi Ryan,

Thank you for your feedback on our application submitted for SOP O4793 on behalf of CyrusOne, LLC for their SAT1 facility.

We have updated the process description and forms per your feedback. Please let us know if you have any questions or additional requests.

Thanks,
Luisa Martin

Classification: Confidential

From: Rachel Korenek <rkorenek@ramboll.com>
Sent: Friday, August 8, 2025 4:31 PM
To: Ryan Glaze <James.Glaze@tceq.texas.gov>; dhenderson@cyrusone.com
Cc: Luisa Martin <LMARTIN@ramboll.com>
Subject: RE: Technical Review -- FOP O4793/Project 38609, CyrusOne LLC/SAT1

Hi Ryan,

Confirming receipt of this email. Items will be addressed no later than the requested date of 9/3.

Have a good weekend!

Rachel Korenek (she/her)

Classification: Confidential

From: Ryan Glaze <James.Glaze@tceq.texas.gov>
Sent: Friday, August 8, 2025 10:25 AM
To: dhenderson@cyrusone.com
Cc: Rachel Korenek <rkorenek@ramboll.com>; Luisa Martin <lmartin@ramboll.com>
Subject: RE: Technical Review -- FOP O4793/Project 38609, CyrusOne LLC/SAT1

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

Good morning,

I have completed my initial review of the initial application for SOP O4793, CyrusOne LLC and have identified the following items that require additional information and/or documentation:

Process Description

- Please provide an updated process description that is 1 ½ pages max for my technical summary. The process description should describe the process with emphasis on the type of emission units, their applicable requirements (in general), and what types of emissions are generated. Each major step in the process should be discussed and should refer to the process flow diagram where appropriate. Please review [Completing FOP Applications - Additional Guidance](#) page 2 for more information about what needs to be in a process description.

Form OP-SUM

- Please review the changes listed in the Form OP-UA2 section of this email. The changes listed there will also need to be documented on Form OP-SUM.

Form OP-PBRSUP

- Since this is the first time Form OP-PBRSUP is being submitted for this permit, all the tables listed in the Form OP-PBRSUP need to be included even if those tables are not being used. Please provide and update Form OP-PBRSUP with Table C included.

- All units listed on Table B will also need to be on Table D to document the monitoring requirements for PBR 106.472 09/04/2000.
- The language provided on Table D for the monitoring requirements for PBR 106.511 09/04/2000 needs to be listed for every unit individually. In addition, the specificity of the monitoring and/or recordkeeping requirements is required to be consistent with the periodic monitoring guidance ([periodicmon.pdf](#)). The language of “CyrusOne established a federally enforceable limit 89.2 tpy NOX...” and the next sentence later “With the proposed NOX limitation....” seems conflicting. Is the NOx limitation established or proposed? Please review [Form OP-PBRSUP - Instructions](#) page 4 for the instructions of what needs to be documented for monitoring requirements on Table D.

Form OP-REQ1 page 89

- PBR 106.472 09/04/2000 needs to be included on the OP-REQ1 page 89.
- The PBR Registration No. 1556744 (which is not a valid PBR Registration No.) needs to be the PBR 106.511 not the registration No. Please remove the PBR Registration no.
- In the version/ No./Date the word “INITIAL” needs to be removed and the date 09/04/2000 only needs to be listed.

Form OP-REQ2

- The negative applicability/superseded requirement citation for all Groups needs to cite the specific main standard based on the negative applicability reason provided. Example, for NSPS Subpart K §60.110 needs to be §60.110(a) as that gives the negative applicability/superseded requirement reason text needed.
- Additionally, when providing Negative Applicability reason, it needs to be close as possible to what is in the citation text. Example, for NSPS Subpart K Negative Applicability Reason “All tanks are constructed after 1978 with a storage capacity less than 40,000 gallons.”
- Furthermore, negative applicability has been documented for NSPS Subpart K, Ka, and Kb. However, negative applicability may also need to be documented for NSPS Subpart Kc. Although TCEQ has not developed a Unit Attribute form for this regulation yet, if a unit is potential subject to NSPS Kc, NSPS Kc applicability should be provided on Form OP-REQ3 or Form OP-REQ2. Please check and see if the diesel belly tanks are potentially subject to this regulation.
- Please provide an updated Form OP-REQ2 with the changes listed above for all the Group IDs listed on Form OP-REQ2.

Form OP-REQ3

- Form OP-REQ3 only Table 1a was provided. Table 1b will also need to be provided to document the monitoring and testing, recordkeeping, and reporting requirements.
- Additionally, the applicable regulatory requirements provided on Table 1a, §115.118(a)(1) and 115.118(a)(7), are recordkeeping requirements. They should go on Table 1b.
- Furthermore, please review the changes below for Form OP-UA3 as this can change how Form OP-REQ3 will need to be updated.

Form OP-UA2

- The Unit IDs and SOP Index Nos. provided are incorrect. Since most of the Units on the Form OP-UA2 are apart of a Group ID, the Group ID should be documented on the UA forms instead of the individual units since all units in a group need to have the same unit attributes. There would only be one SOP Index No. per operating scenario. In this case, I believe there is only one operating scenario, so there should only be one SOP Index No. for the Group ID. Please review [Form OP-UA2 Instructions](#) page 11 and pages 8-10 of the Completing FOP Application – Additional

Guidance document ([additional_fop_guidance.pdf](#)) for more information about SOP Index Numbers. Please note that SOP Index Nos. can only have 15 characters.

- Unit IDs GEN A-1, GEN B-1, GEN C-1, and GEN-House all have different model years according to 40 CFR Part 60, Subpart IIII on Table 5b. Since the model year is 2011 and Unit IDs GEN D-1, GEN A-2, GEN B-2, GEN C-2, and GEN D-2 model is year is 2012 these units cannot belong to the same group. Form OP-SUM describes groups as “A “group” is a collection of units or devices that have identical applicability (or non-applicability) determinations and may, or may not, have a physical relationship”. These Units listed need to be listed individually or be separated into two different groups.
- In the case of Unit ID GEN-House, it has different applicable requirements across both 30 TAC Chapter 117 and 40 CFR Part 60, Subpart IIII. Since this unit has its own applicable requirements which are different from other units in the group, it will need to be documented as an individual Unit and not associated with any group.
- Please document these changes on Form OP-UA2 and Form OP-SUM.

Form OP-UA3

- The Unit IDs and SOP Index Nos. provided are incorrect. Since all units on the Form OP-UA3 are apart of a Group ID, the Group ID should be documented on the UA forms instead of the individual units since all units in a group need to have the same unit attributes. There would only be one SOP Index No. per operating scenario. In this case, I believe there is only one operating scenario, so there should only be one SOP Index No. for the Group ID. Please review [Form OP-UA3 Instructions](#) page 13 and pages 8-10 of the Completing FOP Application – Additional Guidance document ([additional_fop_guidance.pdf](#)) for more information about SOP Index Numbers. Please note that SOP Index Nos. can only have 15 characters.
- Codes provided for Product Stored and Storage Capacity for Table 4a for 30 TAC Chapter 115 Subchapter B, Division 1: Storage of Volatile Organic Compounds (VOCs) are incorrect based on the site’s location being in Bexar County. Please update the responses for Product Stored and Storage Capacity on Table 4a on Form OP-UA3.
- Codes provided for Tank Description and True Vapor Pressure for Table 4b for 30 TAC Chapter 115 Subchapter B, Division 1: Storage of Volatile Organic Compounds (VOCs) are incorrect based on the site’s location being in Bexar County. Additionally, Construction Date isn’t necessary since the site is in Bexar County per the form instructions. Please remove the code provided for Construction date and update the responses for Tank Description and True Vapor Pressure for Table 4b on the Form OP-UA3.

Please provide the updated forms to correct the deficiencies listed above by **September 3, 2025**. Please let me know if you have any questions.

Thanks,

Ryan Glaze

Operating Permits Section

Air Permits Division

Texas Commission on Environmental Quality

P.O. Box 13087 MC 163

Austin, TX, 78711

(512) 239-6212



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

From: Ryan Glaze

Sent: Friday, August 1, 2025 9:33 AM

To: dhenderson@cyrusone.com

Subject: Technical Review -- FOP O4793/Project 38609, CyrusOne LLC/SAT1

Good morning David,

I have been assigned to the Federal Operating Permit (FOP) initial issuance application of Permit No. O4793 for CyrusOne LLC, SAT1. This application has been assigned Project No. 38609. 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,

Ryan Glaze

Operating Permits Section

Air Permits Division

Texas Commission on Environmental Quality

P.O. Box 13087 MC 163

Austin, TX, 78711

(512) 239-6212



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

Confidentiality Notice: The information contained in this communication, including all attachments, may be confidential and/or legally privileged and has been sent for the sole use of the intended recipient(s). If the reader of this message is not an intended recipient, you are hereby notified that any unauthorized review, use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents or attachments, is strictly prohibited. If you are not the intended recipient or otherwise received this communication in error, please contact the sender immediately by reply email and destroy all copies of the original message, including attachments.

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: RN102414737
CN: CN604843086
Account No.:
Permit No.: O4793
Project No.: 38609
Area Name: SAT1
Company Name: CyrusOne LLC
II. Certification Type <i>(Please mark appropriate box)</i>
☒ Responsible Official ☐ 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

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

IV. Certification of Truth
This certification does not extend to information which is designated by TCEQ as information for reference only.
I, <u>Chris Napier</u> certify that I am the <u>Responsible Official (RO)</u> <i>(Certifier Name printed or typed)</i><i>(RO or DAR)</i>
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete: <i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>
Time Period: From <u>August 8, 2025</u> to <u>November 20, 2025</u> <i>(Start Date)</i><i>(End Date)</i>
Specific Dates: _____ <i>(Date 1)</i><i>(Date 2)</i><i>(Date 3)</i><i>(Date 4)</i>
_____ <i>(Date 5)</i><i>(Date 6)</i>
Signature: _____ Signature Date: _____
Title: <u>Vice President, Operations</u>

Texas Commission on Environmental Quality

Title V New

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	SAT1
Does the site have a physical address?	Yes
Physical Address	
Number and Street	9999 WESTOVER HILLS BLVD
City	SAN ANTONIO
State	TX
ZIP	78251
County	BEXAR
Latitude (N) (##.#####)	29.466704
Longitude (W) (-###.#####)	-98.688083
Primary SIC Code	
Secondary SIC Code	
Primary NAICS Code	518210
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN102414737
What is the name of the Regulated Entity (RE)?	STA1
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	9999 WESTOVER HILLS BLVD
City	SAN ANTONIO
State	TX
ZIP	78251
County	BEXAR
Latitude (N) (##.#####)	29.466704
Longitude (W) (-###.#####)	-98.688083
Facility NAICS Code	518210
What is the primary business of this entity?	DATA CENTER

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN604843086
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	CyrusOne LLC
Texas SOS Filing Number	801520887
Federal Tax ID	274286158
State Franchise Tax ID	32046019926
State Sales Tax ID	
Local Tax ID	

DUNS Number	19127739
Number of Employees	251-500
Independently Owned and Operated?	Yes

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	CyrusOne LLC
Prefix	MR
First	Chris
Middle	
Last	Napier
Suffix	
Credentials	
Title	Vice President, Operations
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	2850 N HARWOOD ST STE 2200
Routing (such as Mail Code, Dept., or Attn:)	
City	DALLAS
State	TX
ZIP	75201
Phone (###-###-####)	4808009207
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	cnapier@cyrusone.com

Technical Contact

Person TCEQ should contact for questions about this application:

Same as another contact?	
Organization Name	CyrusOne LLC
Prefix	MR
First	David
Middle	
Last	Henderson
Suffix	
Credentials	
Title	STX Regional Operations Director
Enter new address or copy one from list:	
Mailing Address	RE Physical Address
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	9999 WESTOVER HILLS BLVD
Routing (such as Mail Code, Dept., or Attn:)	
City	SAN ANTONIO

State	TX
ZIP	78251
Phone (###-###-####)	3615329996
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	dhenderson@cyrusone.com

Title V General Information - New

1) Permit Latitude Coordinate:	29 Deg 28 Min 0 Sec
2) Permit Longitude Coordinate:	98 Deg 41 Min 17 Sec
3) Is this submittal a new application or an update to an existing application?	Update
3.1. Is this application update a follow-up to an abbreviated application?	No
3.2. Select the permit/project number for which this update should be applied.	4793-38609
4) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	N/A

Title V Attachments New

Attach OP-1 (Site Information Summary)

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-SUM (Individual Unit Summary)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

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

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name

FINAL_CyrusOne SAT1 TV PSS

Hash

EA050435674D7A0570F103D164718F3FEDE40D13445C3654EA4808FA8F0AC996

MIME-Type

application/pdf

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

Certification

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

1. I am Randolph C Napier, the owner of the STEERS account ER115224.
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 New.
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: Randolph C Napier OWNER OPERATOR

Account Number:	ER115224
Signature IP Address:	216.117.82.220
Signature Date:	2025-12-05
Signature Hash:	AF2E8B47DBF13979E8AD9CE7E5D55D63EE47C07D280FF49F8912F3DCAF10F8AD
Form Hash Code at time of Signature:	405D7794599676E79D3D332055F9C891FE5603CF9E3787E6BC21F2FCFA18BE54

Submission

Reference Number:	The application reference number is 843891
Submitted by:	The application was submitted by ER115224/Randolph C Napier
Submitted Timestamp:	The application was submitted on 2025-12-05 at 11:53:51 CST
Submitted From:	The application was submitted from IP address 216.117.82.220
Confirmation Number:	The confirmation number is 706177
Steers Version:	The STEERS version is 6.93

Additional Information

Application Creator: This account was created by Luisa M Martin

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

Date		Permit No.			Regulated Entity No.	
10/13/2025		04793			RN102414737	
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
		GRP-TANK	UA3	NSPS Subpart K	§60.110(a)	All tanks are constructed after 1978 with a storage capacity less than 40,000 gallons.
		GRP-TANK	UA3	NSPS Subpart Ka	§60.110a(a)	All tanks are constructed after 1978 with a storage capacity less than 40,000 gallons.
		GRP-TANK	UA3	NSPS Subpart Kb	§60.110b(a)	All tanks have a storage capacity less than 19,812.9 gallons (75 m ³).
		GRP-TANK	UA3	NSPS Subpart Kc	§60.110c(a)	All tanks have a storage capacity less than 20,000 gallons and construction was commenced before October 4, 2023.
		GRP-GENCRIT1	UA2	30 TAC Chapter 117 Subchapter B	§117.203(1)(d)	The generator engines are diesel-fired stationary reciprocating internal combustion engines.
		GRP-GENCRIT2	UA2	30 TAC Chapter 117 Subchapter B	§117.203(1)(d)	The generator engines are diesel-fired stationary reciprocating internal combustion engines.
		GEN-House	UA2	30 TAC Chapter 117 Subchapter B	§117.203(1)(d)	The generator engines are diesel-fired stationary reciprocating internal combustion engines.

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

Date	Permit Number	Regulated Entity Number
10/13/2025	O4793	RN102414737

Unit ID No.	Registration No.	PBR No.	Registration Date
GEN A-1	155674	106.511	03/08/2019
GEN B-1	155674	106.511	03/08/2019
GEN C-1	155674	106.511	03/08/2019
GEN D-1	155674	106.511	03/08/2019
GEN A-2	155674	106.511	03/08/2019
GEN B-2	155674	106.511	03/08/2019
GEN C-2	155674	106.511	03/08/2019
GEN D-2	155674	106.511	03/08/2019
GEN - House	155674	106.511	03/08/2019

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

Date	Permit Number	Regulated Entity Number
10/13/2025	O4793	RN102414737

Unit ID No.	PBR No.	Version No./Date
TANK A-1	106.472	09/04/2000
TANK B-1	106.472	09/04/2000
TANK C-1	106.472	09/04/2000
TANK D-1	106.472	09/04/2000
TANK A-2	106.472	09/04/2000
TANK B-2	106.472	09/04/2000
TANK C-2	106.472	09/04/2000
TANK D-2	106.472	09/04/2000
TANK - House	106.472	09/04/2000

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

Date	Permit Number	Regulated Entity Number
10/13/2025	O4793	RN102414737

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
10/13/2025		O4793		RN102414737
Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement	
GEN A-1	106.511	155674	Hours of usage are recorded to demonstrate engine is used less than 10% of normal operating schedule of primary equipment. Emissions are calculated using manufacturer's factors and AP-42 to determine compliance with PBR §106.4 emission limits.	
GEN B-1	106.511	155674	Hours of usage are recorded to demonstrate engine is used less than 10% of normal operating schedule of primary equipment. Emissions are calculated using manufacturer's factors and AP-42 to determine compliance with PBR §106.4 emission limits.	
GEN C-1	106.511	155674	Hours of usage are recorded to demonstrate engine is used less than 10% of normal operating schedule of primary equipment. Emissions are calculated using manufacturer's factors and AP-42 to determine compliance with PBR §106.4 emission limits.	
GEN D-1	106.511	155674	Hours of usage are recorded to demonstrate engine is used less than 10% of normal operating schedule of primary equipment. Emissions are calculated using manufacturer's factors and AP-42 to determine compliance with PBR §106.4 emission limits.	
GEN A-2	106.511	155674	Hours of usage are recorded to demonstrate engine is used less than 10% of normal operating schedule of primary equipment. Emissions are calculated using manufacturer's factors and AP-42 to determine compliance with PBR §106.4 emission limits.	
GEN B-2	106.511	155674	Hours of usage are recorded to demonstrate engine is used less than 10% of normal operating schedule of primary equipment. Emissions are calculated using manufacturer's factors and AP-42 to determine compliance with PBR §106.4 emission limits.	
GEN C-2	106.511	155674	Hours of usage are recorded to demonstrate engine is used less than 10% of normal operating schedule of primary equipment. Emissions are calculated using manufacturer's factors and AP-42 to determine compliance with PBR §106.4 emission limits.	
GEN D-2	106.511	155674	Hours of usage are recorded to demonstrate engine is used less than 10% of normal operating schedule of primary equipment. Emissions are calculated using manufacturer's factors and AP-42 to determine compliance with PBR §106.4 emission limits.	
GEN - House	106.511	155674	Hours of usage are recorded to demonstrate engine is used less than 10% of normal operating schedule of primary equipment. Emissions are calculated using manufacturer's factors and AP-42 to determine compliance with PBR §106.4 emission limits.	

TANK A-1	106.472	09/04/2000	1) No visible emissions - No monitoring needed given the contents of the tank are liquids that do not produce fumes. 2) Chemicals loaded, unloaded, or stored are limited to the list found in §106.472(1)-(9). Emissions will be estimated using AP- 42 Chapter 7 to determine compliance with PBR §106.4 emission limits.
TANK B-1	106.472	09/04/2000	1) No visible emissions - No monitoring needed given the contents of the tank are liquids that do not produce fumes. 2) Chemicals loaded, unloaded, or stored are limited to the list found in §106.472(1)-(9). Emissions will be estimated using AP- 42 Chapter 7 to determine compliance with PBR §106.4 emission limits.
TANK C-1	106.472	09/04/2000	1) No visible emissions - No monitoring needed given the contents of the tank are liquids that do not produce fumes. 2) Chemicals loaded, unloaded, or stored are limited to the list found in §106.472(1)-(9). Emissions will be estimated using AP- 42 Chapter 7 to determine compliance with PBR §106.4 emission limits.
TANK D-1	106.472	09/04/2000	1) No visible emissions - No monitoring needed given the contents of the tank are liquids that do not produce fumes. 2) Chemicals loaded, unloaded, or stored are limited to the list found in §106.472(1)-(9). Emissions will be estimated using AP- 42 Chapter 7 to determine compliance with PBR §106.4 emission limits.
TANK A-2	106.472	09/04/2000	1) No visible emissions - No monitoring needed given the contents of the tank are liquids that do not produce fumes. 2) Chemicals loaded, unloaded, or stored are limited to the list found in §106.472(1)-(9). Emissions will be estimated using AP- 42 Chapter 7 to determine compliance with PBR §106.4 emission limits.
TANK B-2	106.472	09/04/2000	1) No visible emissions - No monitoring needed given the contents of the tank are liquids that do not produce fumes. 2) Chemicals loaded, unloaded, or stored are limited to the list found in §106.472(1)-(9). Emissions will be estimated using AP- 42 Chapter 7 to determine compliance with PBR §106.4 emission limits.
TANK C-2	106.472	09/04/2000	1) No visible emissions - No monitoring needed given the contents of the tank are liquids that do not produce fumes. 2) Chemicals loaded, unloaded, or stored are limited to the list found in §106.472(1)-(9). Emissions will be estimated using AP- 42 Chapter 7 to determine compliance with PBR §106.4 emission limits.

TANK D-2	106.472	09/04/2000	1) No visible emissions - No monitoring needed given the contents of the tank are liquids that do not produce fumes. 2) Chemicals loaded, unloaded, or stored are limited to the list found in §106.472(1)-(9). Emissions will be estimated using AP- 42 Chapter 7 to determine compliance with PBR §106.4 emission limits.
TANK - House	106.472	09/04/2000	1) No visible emissions - No monitoring needed given the contents of the tank are liquids that do not produce fumes. 2) Chemicals loaded, unloaded, or stored are limited to the list found in §106.472(1)-(9). Emissions will be estimated using AP- 42 Chapter 7 to determine compliance with PBR §106.4 emission limits.

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

Date		Permit No.			Regulated Entity No.	
10/3/2025		04793			RN102414737	
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
		GRP-TANK	UA3	NSPS Subpart K	§60.110(a)	All tanks are constructed after 1978 with a storage capacity less than 40,000 gallons.
		GRP-TANK	UA3	NSPS Subpart Ka	§60.110a(a)	All tanks are constructed after 1978 with a storage capacity less than 40,000 gallons.
		GRP-TANK	UA3	NSPS Subpart Kb	§60.110b(a)	All tanks have a storage capacity less than 19,812.9 gallons (75 m ³).
		GRP-TANK	UA3	NSPS Subpart Kc	§60.110c(a)	All tanks have a storage capacity less than 20,000 gallons and construction was commenced before October 4, 2023.
		GRP-GENCRIT1	UA2	30 TAC Chapter 117 Subchapter B	§117.200(3)	The generator engines are diesel-fired stationary reciprocating internal combustion engines.
		GRP-GENCRIT2	UA2	30 TAC Chapter 117 Subchapter B	§117.203(1)(d)	The generator engines are diesel-fired stationary reciprocating internal combustion engines.
		GEN-House	UA2	30 TAC Chapter 117 Subchapter B	§117.203(1)(d)	The generator engines are diesel-fired stationary reciprocating internal combustion engines.

Permit By Rule Supplemental Table (Page 1)

**Table A: Registered Permits by Rule (30 TAC Chapter 106) for the Application Area
Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
10/3/2025	O4793	RN102414737

Unit ID No.	Registration No.	PBR No.	Registration Date
ENG1-SAI	155674	106.511	03/08/2019
ENG2-SAI	155674	106.511	03/08/2019
ENG3-SAI	155674	106.511	03/08/2019
ENG4-SAI	155674	106.511	03/08/2019
ENG5-SAI	155674	106.511	03/08/2019
ENG6-SAI	155674	106.511	03/08/2019
ENG7-SAI	155674	106.511	03/08/2019
ENG8-SAI	155674	106.511	03/08/2019
ENG9-SAI	155674	106.511	03/08/2019

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

Date	Permit Number	Regulated Entity Number
10/3/2025	O4793	RN102414737

Unit ID No.	PBR No.	Version No./Date
Gena1	106.472	09/04/2000
Gena2	106.472	09/04/2000
Genb1	106.472	09/04/2000
Genb2	106.472	09/04/2000
Genc1	106.472	09/04/2000
Genc2	106.472	09/04/2000
Gend1	106.472	09/04/2000
Gend2	106.472	09/04/2000
House1	106.472	09/04/2000

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

Date	Permit Number	Regulated Entity Number
10/3/2025	O4793	RN102414737

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
10/3/2025		O4793		RN102414737
Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement	
ENG1-SAI	106.511	155674	Hours of usage are recorded to demonstrate engine is used less than 10% of normal operating schedule of primary equipment. Emissions are calculated using manufacturer's factors and AP-42 to determine compliance with PBR §106.4 emission limits.	
ENG2-SAI	106.511	155674	Hours of usage are recorded to demonstrate engine is used less than 10% of normal operating schedule of primary equipment. Emissions are calculated using manufacturer's factors and AP-42 to determine compliance with PBR §106.4 emission limits.	
ENG3-SAI	106.511	155674	Hours of usage are recorded to demonstrate engine is used less than 10% of normal operating schedule of primary equipment. Emissions are calculated using manufacturer's factors and AP-42 to determine compliance with PBR §106.4 emission limits.	
ENG4-SAI	106.511	155674	Hours of usage are recorded to demonstrate engine is used less than 10% of normal operating schedule of primary equipment. Emissions are calculated using manufacturer's factors and AP-42 to determine compliance with PBR §106.4 emission limits.	
ENG5-SAI	106.511	155674	Hours of usage are recorded to demonstrate engine is used less than 10% of normal operating schedule of primary equipment. Emissions are calculated using manufacturer's factors and AP-42 to determine compliance with PBR §106.4 emission limits.	
ENG6-SAI	106.511	155674	Hours of usage are recorded to demonstrate engine is used less than 10% of normal operating schedule of primary equipment. Emissions are calculated using manufacturer's factors and AP-42 to determine compliance with PBR §106.4 emission limits.	
ENG7-SAI	106.511	155674	Hours of usage are recorded to demonstrate engine is used less than 10% of normal operating schedule of primary equipment. Emissions are calculated using manufacturer's factors and AP-42 to determine compliance with PBR §106.4 emission limits.	
ENG8-SAI	106.511	155674	Hours of usage are recorded to demonstrate engine is used less than 10% of normal operating schedule of primary equipment. Emissions are calculated using manufacturer's factors and AP-42 to determine compliance with PBR §106.4 emission limits.	
ENG9-SAI	106.511	155674	Hours of usage are recorded to demonstrate engine is used less than 10% of normal operating schedule of primary equipment. Emissions are calculated using manufacturer's factors and AP-42 to determine compliance with PBR §106.4 emission limits.	

Genal	106.472	09/04/2000	1) No visible emissions - No monitoring needed given the contents of the tank are liquids that do not produce fumes. 2) Chemicals loaded, unloaded, or stored are limited to the list found in §106.472(1)-(9). Emissions will be estimated using AP- 42 Chapter 7 to determine compliance with PBR §106.4 emission limits.
Gena2	106.472	09/04/2000	1) No visible emissions - No monitoring needed given the contents of the tank are liquids that do not produce fumes. 2) Chemicals loaded, unloaded, or stored are limited to the list found in §106.472(1)-(9). Emissions will be estimated using AP- 42 Chapter 7 to determine compliance with PBR §106.4 emission limits.
Genb1	106.472	09/04/2000	1) No visible emissions - No monitoring needed given the contents of the tank are liquids that do not produce fumes. 2) Chemicals loaded, unloaded, or stored are limited to the list found in §106.472(1)-(9). Emissions will be estimated using AP- 42 Chapter 7 to determine compliance with PBR §106.4 emission limits.
Genb2	106.472	09/04/2000	1) No visible emissions - No monitoring needed given the contents of the tank are liquids that do not produce fumes. 2) Chemicals loaded, unloaded, or stored are limited to the list found in §106.472(1)-(9). Emissions will be estimated using AP- 42 Chapter 7 to determine compliance with PBR §106.4 emission limits.
Genc1	106.472	09/04/2000	1) No visible emissions - No monitoring needed given the contents of the tank are liquids that do not produce fumes. 2) Chemicals loaded, unloaded, or stored are limited to the list found in §106.472(1)-(9). Emissions will be estimated using AP- 42 Chapter 7 to determine compliance with PBR §106.4 emission limits.
Genc2	106.472	09/04/2000	1) No visible emissions - No monitoring needed given the contents of the tank are liquids that do not produce fumes. 2) Chemicals loaded, unloaded, or stored are limited to the list found in §106.472(1)-(9). Emissions will be estimated using AP- 42 Chapter 7 to determine compliance with PBR §106.4 emission limits.
Gend1	106.472	09/04/2000	1) No visible emissions - No monitoring needed given the contents of the tank are liquids that do not produce fumes. 2) Chemicals loaded, unloaded, or stored are limited to the list found in §106.472(1)-(9). Emissions will be estimated using AP- 42 Chapter 7 to determine compliance with PBR §106.4 emission limits.

Gend2	106.472	09/04/2000	1) No visible emissions - No monitoring needed given the contents of the tank are liquids that do not produce fumes. 2) Chemicals loaded, unloaded, or stored are limited to the list found in §106.472(1)-(9). Emissions will be estimated using AP- 42 Chapter 7 to determine compliance with PBR §106.4 emission limits.
House1	106.472	09/04/2000	1) No visible emissions - No monitoring needed given the contents of the tank are liquids that do not produce fumes. 2) Chemicals loaded, unloaded, or stored are limited to the list found in §106.472(1)-(9). Emissions will be estimated using AP- 42 Chapter 7 to determine compliance with PBR §106.4 emission limits.

ATTACHMENT A
FACILITY INFORMATION

PROCESS FLOW DIAGRAM

PROCESS FLOW DIAGRAMS

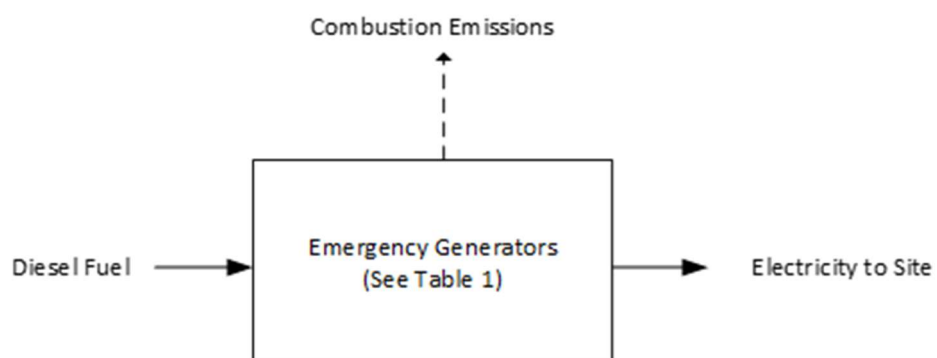


Figure 3. Process Flow Diagram for Emergency Engines

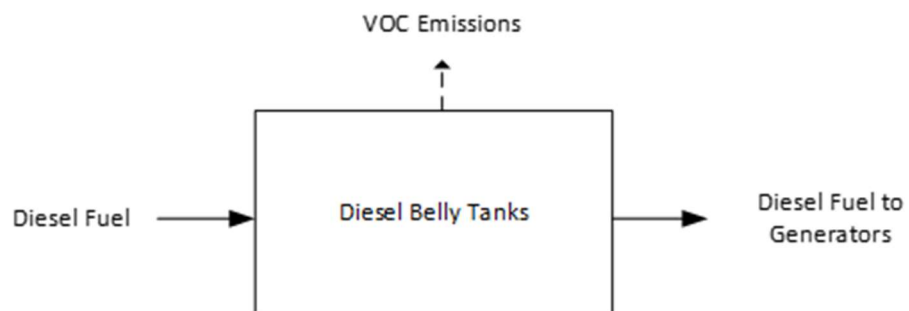


Figure 4. Process Flow Diagram for Diesel Belly Tanks

PROCESS DESCRIPTION

PROCESS DESCRIPTION

CyrusOne owns and operates the SAT1 data center ("the site" or "the facility"), located at 9999 Westover Hills Blvd, San Antonio, Bexar County, Texas. The facility's operations include two types of emission units – stationary reciprocating internal combustion engines (RICE), which serve as diesel emergency generators, and their associated diesel belly storage tanks. These emergency generator engines will provide backup electricity for the facility's operations in the event of an emergency or power loss from the utility provider.

The emergency generators are regularly operated to perform maintenance and readiness checks as required by the equipment manufacturer. These units comply with the requirements set forth in the New Source Performance Standards (NSPS) subpart IIII, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines Subpart ZZZZ, and 30 TAC Chapter 117 Subchapter B for Combustion Control at major sources in ozone nonattainment areas. The operation of the generators results in combustion emissions including volatile organic compounds (VOC), oxides of nitrogen (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter (PM), particulate matter less than 10 microns in diameter (PM₁₀), particulate matter less than 2.5 microns in diameter (PM_{2.5}), and hazardous air pollutants (HAPs).

Each emergency generator is equipped with an associated diesel belly storage tank, the second type of emission unit at the facility. These tanks store diesel fuel for the generators and are periodically refueled, resulting in VOC emissions. The tanks are subject to the requirements set forth in 30 TAC Chapter 115 Subchapter B, Division 1 for VOC storage.

To provide clear understanding of the processes at the facility, process flow diagrams for the operation of the emergency generators and diesel belly storage tanks are presented in an earlier portion of this attachment (Figures 3 and 4).

By submitting this application, CyrusOne confirms the establishment of SAT1 as a Title V major source due to the change in nonattainment status of Bexar County under the National Ambient Air Quality Standards (NAAQS). CyrusOne's proposed operation of the stationary RICE units will ensure that VOC and all other criteria pollutant emissions will remain below the Title V major source thresholds. Bexar County is in attainment for CO, PM₁₀, PM_{2.5}, and SO₂.

A list of the generator IDs associated with each engine is shown in **Table 1**.

Table 1. Emergency Generators at SAT1

EPN	Installation Date	Generator Make and Model	Associated Diesel Belly Tanks
ENG1-SAI	2011	MTU 16V4000G83	TANK A-1
ENG2-SAI	2011	MTU 16V4000G83	TANK B-1
ENG3-SAI	2011	MTU 16V4000G83	TANK C-1

EPN	Installation Date	Generator Make and Model	Associated Diesel Belly Tanks
ENG4-SAI	2012	MTU 16V4000G83	TANK D-1
ENG5-SAI	2012	MTU 16V4000G83	TANK A-2
ENG6-SAI	2012	MTU 16V4000G83	TANK B-2
ENG7-SAI	2012	MTU 16V4000G83	TANK C-2
ENG8-SAI	2012	MTU 16V4000G83	TANK D-2
ENG9-SAI	2011	MTU 6R1600G80S	TANK-House

ATTACHMENT B
APPLICATION FORMS

**OP-REQ1 (PAGE 89 ONLY) – Application Area-Wide Applicability
Determinations and General Information**

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

Date	Permit No.	Regulated Entity No.
8/13/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Authorization No.	Issuance Date	Authorization No.	Issuance Date	Authorization No.	Issuance Date
N/A					

- ◆ **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
106.511	09/04/2000	106.472	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
N/A					

OP-REQ2 - Negative Applicable Requirement Determinations Form

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

Date			Permit No.			Regulated Entity No.
08/13/2025			04793			RN102414737
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
		GRP-TANK	UA3	NSPS Subpart K	§60.110(a)	All tanks are constructed after 1978 with a storage capacity less than 40,000 gallons.
		GRP-TANK	UA3	NSPS Subpart Ka	§60.110a(a)	All tanks are constructed after 1978 with a storage capacity less than 40,000 gallons.
		GRP-TANK	UA3	NSPS Subpart Kb	§60.110b(a)	All tanks have a storage capacity less than 19,812.9 gallons (75 m ³).
		GRP-TANK	UA3	NSPS Subpart Kc	§60.110c(a)	All tanks have a storage capacity less than 20,000 gallons and construction was commenced before October 4, 2023.
		GRP-GENCRIT1	UA2	30 TAC Chapter 117 Subchapter B	§117.203(1)(d)	The generator engines are diesel-fired compression ignition engines. Additionally, the generators are operated exclusively in emergency situations, and maintenance and testing operations are limited to 100 hours per year.
		GRP-GENCRIT2	UA2	30 TAC Chapter 117 Subchapter B	§117.203(1)(d)	The generator engines are diesel-fired compression ignition engines. Additionally, the generators are operated exclusively in emergency situations, and maintenance and testing operations are limited to 100 hours per year.

		GEN-House	UA2	30 TAC Chapter 117 Subchapter B	§117.203(1)(d)	The generator engine is a diesel-fired compression ignition engine. Additionally, the generator is operated exclusively in emergency situations, and maintenance and testing operations are limited to 100 hours per year.
--	--	-----------	-----	------------------------------------	----------------	--

OP-REQ3 - Applicable Requirements Summary Form

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

Table 1a: Additions

Date: Rev. 08/27/2025	Regulated Entity No.: RN102414737	Permit No.: O4793
Company Name: CyrusOne, LLC	Area Name: SAT1	

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)
	GRP-TANK	UA3	R5112-GRP-TANK	VOC	Chapter 115	§115.110(a)(2)
	GRP-GENCRIT1	UA2	R7200-GENCRIT1	NOX	Chapter 117, Subchapter B	§117.203(1)(d), 117.240(f)
	GRP-GENCRIT2	UA2	R7200-GENCRIT2	NOX	NSPS IIII	§117.203(1)(d), 117.240(f)
	GEN - House	UA2	R7200-House	NOX	NSPS IIII	§117.203(1)(d), 117.240(f)
	GRP-GENCRIT1	UA2	63ZZZZ-GENCRIT1	HAPS	NESHAP ZZZZ	63.590(c)
	GRP-GENCRIT2	UA2	63ZZZZ-GENCRIT2	HAPS	NESHAP ZZZZ	63.590(c)
	GEN - House	UA2	63ZZZZ - House	HAPS	NESHAP ZZZZ	63.590(c)

	GRP-GENCRIT1	UA2	60III- GENCRIT1	NMHC+NOX	NSPS IIII	§60.4202(b)(2) 1039-Appendix I §60.4205(b) §60.4206 §60.4207(b) [G]§60.4211(a) §60.4211(c) [G]§60.4211(f)
	GRP-GENCRIT1	UA2	60III- GENCRIT1	CO	NSPS IIII	§60.4202(b)(2) 1039-Appendix I §60.4205(b) §60.4206 §60.4207(b) [G]§60.4211(a) §60.4211(c) [G]§60.4211(f)
	GRP-GENCRIT1	UA2	60III- GENCRIT1	PM	NSPS IIII	§60.4202(b)(2) 1039-Appendix I §60.4205(b) §60.4206 §60.4207(b) [G]§60.4211(a) §60.4211(c) [G]§60.4211(f)
	GRP-GENCRIT1	UA2	60III- GENCRIT1	Opacity	NSPS IIII	§60.4202(b)(2) 1039-Appendix I §60.4205(b) §60.4206 §60.4207(b) [G]§60.4211(a) §60.4211(c) [G]§60.4211(f)

	GRP-GENCRIT2	UA2	60III-GENCRIT2	NMHC+NOX	NSPS IIII	§60.4202(b)(2) 1039-Appendix I §60.4205(b) §60.4206 §60.4207(b) [G]§60.4211(a) §60.4211(c) [G]§60.4211(f)
	GRP-GENCRIT2	UA2	60III-GENCRIT2	CO	NSPS IIII	§60.4202(b)(2) 1039-Appendix I §60.4205(b) §60.4206 §60.4207(b) [G]§60.4211(a) §60.4211(c) [G]§60.4211(f)
	GRP-GENCRIT2	UA2	60III-GENCRIT2	PM	NSPS IIII	§60.4202(b)(2) 1039-Appendix I §60.4205(b) §60.4206 §60.4207(b) [G]§60.4211(a) §60.4211(c) [G]§60.4211(f)
	GRP-GENCRIT2	UA2	60III-House	Opacity	NSPS IIII	§60.4202(a)(2) 1039-Appendix I §60.4205(b) §60.4206 §60.4207(b) [G]§60.4211(a) §60.4211(c) [G]§60.4211(f)

	GEN - House	UA2	60III-House	NMHC+NOX	NSPS IIII	§60.4202(a)(2) 1039-Appendix I §60.4205(b) §60.4206 §60.4207(b) [G]§60.4211(a) §60.4211(c) [G]§60.4211(f)
	GEN - House	UA2	60III-House	CO	NSPS IIII	§60.4202(a)(2) 1039-Appendix I §60.4205(b) §60.4206 §60.4207(b) [G]§60.4211(a) §60.4211(c) [G]§60.4211(f)
	GEN - House	UA2	60III-House	PM	NSPS IIII	§60.4202(a)(2) 1039-Appendix I §60.4205(b) §60.4206 §60.4207(b) [G]§60.4211(a) §60.4211(c) [G]§60.4211(f)
	GEN - House	UA2	60III-House	Opacity	NSPS IIII	§60.4202(a)(2) 1039-Appendix I §60.4205(b) §60.4206 §60.4207(b) [G]§60.4211(a) §60.4211(c) [G]§60.4211(f)

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

Table 1b: Additions

Date: Rev. 08/27/2025	Regulated Entity No.: RN102414737	Permit No.: O4793
Company Name: CyrusOne, LLC	Area Name: SAT1	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
	GRP-TANK	R5112-GRP-TANK	VOC	[G]115.117	§115.118(a)(1) §115.118(a)(7)	None
	GRP-GENCRIT1	R7200-GENCRIT1	NOX	None	§117.245(f)(4)	None
	GRP-GENCRIT2	R7200-GENCRIT2	NOX	None	§117.245(f)(4)	None
	GEN - House	R7200-House	NOX	None	§117.245(f)(4)	None
	GRP-GENCRIT1	63ZZZZ-GENCRIT1	HAPS	None	None	None
	GRP-GENCRIT2	63ZZZZ-GENCRIT2	HAPS	None	None	None
	GEN - House	63ZZZZ -House	HAPS	None	None	None
	GRP-GENCRIT1	60III-GENCRIT1	NMHC+ NOX	§60.4209(a)	§60.4214(b)	[G] §60.4214(d)
	GRP-GENCRIT1	60III-GENCRIT1	CO	§60.4209(a)	§60.4214(b)	[G] §60.4214(d)
	GRP-GENCRIT1	60III-GENCRIT1	PM	§60.4209(a)	§60.4214(b)	[G] §60.4214(d)

	GRP-GENCRIT1	60III-GENCRIT1	Opacity	§60.4209(a)	§60.4214(b)	[G] §60.4214(d)
	GRP-GENCRIT2	60III-GENCRIT2	NMHC+ NOX	§60.4209(a)	§60.4214(b)	[G] §60.4214(d)
	GRP-GENCRIT2	60III-GENCRIT2	CO	§60.4209(a)	§60.4214(b)	[G] §60.4214(d)
	GRP-GENCRIT2	60III-GENCRIT2	PM	§60.4209(a)	§60.4214(b)	[G] §60.4214(d)
	GRP-GENCRIT2	60III-GENCRIT2	Opacity	§60.4209(a)	§60.4214(b)	[G] §60.4214(d)
	GEN - House	60III -House	NMHC+ NOX	§60.4209(a)	§60.4214(b)	[G] §60.4214(d)
	GEN - House	60III -House	CO	§60.4209(a)	§60.4214(b)	[G] §60.4214(d)
	GEN - House	60III -House	PM	§60.4209(a)	§60.4214(b)	[G] §60.4214(d)
	GEN - House	60III -House	Opacity	§60.4209(a)	§60.4214(b)	[G] §60.4214(d)

OP-SUM – Individual Unit Summary

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

[Table 1](#)

Date	Permit No.	Regulated Entity No.
8/13/2025	O4793	RN102414737

Unit/Process ID No.	Applicable Form	Unit Name/Description	CAM	Preconstruction Authorizations 30 TAC Chapter 116/30 TAC Chapter 106	Preconstruction Authorizations Title I	Group ID No.
GEN A-1	OP-UA2	Emergency Critical Generator 1 ENG1-SAI		106.511/09/04/2000[155674]		GRP-GENCRIT1
GEN B-1	OP-UA2	Emergency Critical Generator 2 ENG2-SAI		106.511/09/04/2000[155674]		GRP-GENCRIT1
GEN C-1	OP-UA2	Emergency Critical Generator 3 ENG3-SAI		106.511/09/04/2000[155674]		GRP-GENCRIT1
GEN D-1	OP-UA2	Emergency Critical Generator 4 ENG4-SAI		106.511/09/04/2000[155674]		GRP-GENCRIT2
GEN A-2	OP-UA2	Emergency Critical Generator 5 ENG5-SAI		106.511/09/04/2000[155674]		GRP-GENCRIT2
GEN B-2	OP-UA2	Emergency Critical Generator 6 ENG6-SAI		106.511/09/04/2000[155674]		GRP-GENCRIT2
GEN C-2	OP-UA2	Emergency Critical Generator 7 ENG7-SAI		106.511/09/04/2000[155674]		GRP-GENCRIT2
GEN D-2	OP-UA2	Emergency Critical Generator 8 ENG8-SAI		106.511/09/04/2000[155674]		GRP-GENCRIT2
GEN - House	OP-UA2	Emergency House Generator 1 ENG9-SAI		106.511/09/04/2000[155674]		

TANK A-1	OP-UA3	Diesel Belly Tank 1 Gena1		106.472/09/04/2000		GRP-TANK
TANK B-1	OP-UA3	Diesel Belly Tank 2 Gena2		106.472/09/04/2000		GRP-TANK
TANK C-1	OP-UA3	Diesel Belly Tank 3 Genb1		106.472/09/04/2000		GRP-TANK
TANK D-1	OP-UA3	Diesel Belly Tank 4 Genb2		106.472/09/04/2000		GRP-TANK
TANK A-2	OP-UA3	Diesel Belly Tank 5 Genc1		106.472/09/04/2000		GRP-TANK
TANK B-2	OP-UA3	Diesel Belly Tank 6 Genc2		106.472/09/04/2000		GRP-TANK
TANK C-2	OP-UA3	Diesel Belly Tank 7 Gend1		106.472/09/04/2000		GRP-TANK
TANK D-2	OP-UA3	Diesel Belly Tank 8 Gend2		106.472/09/04/2000		GRP-TANK
TANK - House	OP-UA3	Diesel Belly Tank 9 House1		106.472/09/04/2000		GRP-TANK

OP-PBRSUP – Permits by Rule Supplemental Table

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

Date	Permit Number	Regulated Entity Number
5/27/2025	TBA	RN102414737

Unit ID No.	Registration No.	PBR No.	Registration Date
ENG1-SAI	155674	106.511	03/08/2019
ENG2-SAI	155674	106.511	03/08/2019
ENG3-SAI	155674	106.511	03/08/2019
ENG4-SAI	155674	106.511	03/08/2019
ENG5-SAI	155674	106.511	03/08/2019
ENG6-SAI	155674	106.511	03/08/2019
ENG7-SAI	155674	106.511	03/08/2019
ENG8-SAI	155674	106.511	03/08/2019
ENG9-SAI	155674	106.511	03/08/2019

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

Date	Permit Number	Regulated Entity Number
5/27/2025	TBA	RN102414737

Unit ID No.	PBR No.	Version No./Date
Gena1	106.472	09/04/2000
Gena2	106.472	09/04/2000
Genb1	106.472	09/04/2000
Genb2	106.472	09/04/2000
Genc1	106.472	09/04/2000
Genc2	106.472	09/04/2000
Gend1	106.472	09/04/2000
Gend2	106.472	09/04/2000
House1	106.472	09/04/2000

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

Date	Permit Number	Regulated Entity Number

PBR No.	Version No./Date

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

Date	Permit Number	Regulated Entity Number
5/27/2025	TBA	RN102414737

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
ENG1-SAI	106.511	155674	CyrusOne established a federally enforceable limit of 89.82 tpy NO _x on an aggregate, 12-month rolling basis for these emergency generators. With the NO _x limitation, emissions of CO, VOC, and PM (filterable)/PM ₁₀ /PM _{2.5} , SO ₂ and HAPs are inherently limited to stay below PBR and Major Source thresholds. CyrusOne maintains on-site records of the monthly 12-month rolling total of NO _x emissions from all generators. Emissions will be monitored on a monthly basis and are calculated by recording hours of operation and reason of operation for each generator, to ensure NO _x emissions remain below permitted thresholds. Additionally, no individual generator will operate for more than 10% of the normal annual operating schedule for the data center, or 876 hours annually, as required by the PBR in §106.511.
ENG2-SAI	106.511	155674	CyrusOne established a federally enforceable limit of 89.82 tpy NO _x on an aggregate, 12-month rolling basis for these emergency generators. With the NO _x limitation, emissions of CO, VOC, and PM (filterable)/PM ₁₀ /PM _{2.5} , SO ₂ and HAPs are inherently limited to stay below PBR and Major Source thresholds. CyrusOne maintains on-site records of the monthly 12-month rolling total of NO _x emissions from all generators. Emissions will be monitored on a monthly basis and are calculated by recording hours of operation and reason of operation for each generator, to ensure NO _x emissions remain below permitted thresholds. Additionally, no individual generator will operate for more than 10% of the normal annual operating schedule for the data center, or 876 hours annually, as required by the PBR in §106.511.
ENG3-SAI	106.511	155674	CyrusOne established a federally enforceable limit of 89.82 tpy NO _x on an aggregate, 12-month rolling basis for these emergency generators. With the NO _x limitation, emissions of CO, VOC, and PM (filterable)/PM ₁₀ /PM _{2.5} , SO ₂ and HAPs are inherently limited to stay below PBR and Major Source thresholds. CyrusOne maintains on-site records of the monthly 12-month rolling total of NO _x emissions from all generators. Emissions will be monitored on a monthly basis and are calculated by recording hours of operation and reason of operation for each generator, to ensure NO _x emissions remain below permitted thresholds. Additionally, no individual generator will operate for more than 10% of the normal annual operating schedule for the data center, or 876 hours annually, as required by the PBR in §106.511.

ENG4-SAI	106.511	155674	CyrusOne established a federally enforceable limit of 89.82 tpy NO _x on an aggregate, 12-month rolling basis for these emergency generators. With the NO _x limitation, emissions of CO, VOC, and PM (filterable)/PM ₁₀ /PM _{2.5} , SO ₂ and HAPs are inherently limited to stay below PBR and Major Source thresholds. CyrusOne maintains on-site records of the monthly 12-month rolling total of NO _x emissions from all generators. Emissions will be monitored on a monthly basis and are calculated by recording hours of operation and reason of operation for each generator, to ensure NO _x emissions remain below permitted thresholds. Additionally, no individual generator will operate for more than 10% of the normal annual operating schedule for the data center, or 876 hours annually, as required by the PBR in §106.511.
ENG5-SAI	106.511	155674	CyrusOne established a federally enforceable limit of 89.82 tpy NO _x on an aggregate, 12-month rolling basis for these emergency generators. With the NO _x limitation, emissions of CO, VOC, and PM (filterable)/PM ₁₀ /PM _{2.5} , SO ₂ and HAPs are inherently limited to stay below PBR and Major Source thresholds. CyrusOne maintains on-site records of the monthly 12-month rolling total of NO _x emissions from all generators. Emissions will be monitored on a monthly basis and are calculated by recording hours of operation and reason of operation for each generator, to ensure NO _x emissions remain below permitted thresholds. Additionally, no individual generator will operate for more than 10% of the normal annual operating schedule for the data center, or 876 hours annually, as required by the PBR in §106.511.
ENG6-SAI	106.511	155674	CyrusOne established a federally enforceable limit of 89.82 tpy NO _x on an aggregate, 12-month rolling basis for these emergency generators. With the NO _x limitation, emissions of CO, VOC, and PM (filterable)/PM ₁₀ /PM _{2.5} , SO ₂ and HAPs are inherently limited to stay below PBR and Major Source thresholds. CyrusOne maintains on-site records of the monthly 12-month rolling total of NO _x emissions from all generators. Emissions will be monitored on a monthly basis and are calculated by recording hours of operation and reason of operation for each generator, to ensure NO _x emissions remain below permitted thresholds. Additionally, no individual generator will operate for more than 10% of the normal annual operating schedule for the data center, or 876 hours annually, as required by the PBR in §106.511.
ENG7-SAI	106.511	155674	CyrusOne established a federally enforceable limit of 89.82 tpy NO _x on an aggregate, 12-month rolling basis for these emergency generators. With the NO _x limitation, emissions of CO, VOC, and PM (filterable)/PM ₁₀ /PM _{2.5} , SO ₂ and HAPs are inherently limited to stay below PBR and Major Source thresholds. CyrusOne maintains on-site records of the monthly 12-month rolling total of NO _x emissions from all generators. Emissions will be monitored on a monthly basis and are calculated by recording hours of operation and reason of operation for each generator, to ensure NO _x emissions remain below permitted thresholds. Additionally, no individual generator will operate for more than 10% of the normal annual operating schedule for the data center, or 876 hours annually, as required by the PBR in §106.511.

ENG8-SAI	106.511	155674	CyrusOne established a federally enforceable limit of 89.82 tpy NO _x on an aggregate, 12-month rolling basis for these emergency generators. With the NO _x limitation, emissions of CO, VOC, and PM (filterable)/PM ₁₀ /PM _{2.5} , SO ₂ and HAPs are inherently limited to stay below PBR and Major Source thresholds. CyrusOne maintains on-site records of the monthly 12-month rolling total of NO _x emissions from all generators. Emissions will be monitored on a monthly basis and are calculated by recording hours of operation and reason of operation for each generator, to ensure NO _x emissions remain below permitted thresholds. Additionally, no individual generator will operate for more than 10% of the normal annual operating schedule for the data center, or 876 hours annually, as required by the PBR in §106.511.
ENG9-SAI	106.511	155674	CyrusOne established a federally enforceable limit of 89.82 tpy NO _x on an aggregate, 12-month rolling basis for these emergency generators. With the NO _x limitation, emissions of CO, VOC, and PM (filterable)/PM ₁₀ /PM _{2.5} , SO ₂ and HAPs are inherently limited to stay below PBR and Major Source thresholds. CyrusOne maintains on-site records of the monthly 12-month rolling total of NO _x emissions from all generators. Emissions will be monitored on a monthly basis and are calculated by recording hours of operation and reason of operation for each generator, to ensure NO _x emissions remain below permitted thresholds. Additionally, no individual generator will operate for more than 10% of the normal annual operating schedule for the data center, or 876 hours annually, as required by the PBR in §106.511.
Gena1	106.472	09/04/2000	CyrusOne tracks monthly fuel usage to ensure 12-month rolling emissions comply with the requirements of §106.4. When material is loaded, CyrusOne ensures there are no visible emissions, as required by the PBR in §106.472.
Gena2	106.472	09/04/2000	CyrusOne tracks monthly fuel usage to ensure 12-month rolling emissions comply with the requirements of §106.4. When material is loaded, CyrusOne ensures there are no visible emissions, as required by the PBR in §106.472.
Genb1	106.472	09/04/2000	CyrusOne tracks monthly fuel usage to ensure 12-month rolling emissions comply with the requirements of §106.4. When material is loaded, CyrusOne ensures there are no visible emissions, as required by the PBR in §106.472.
Genb2	106.472	09/04/2000	CyrusOne tracks monthly fuel usage to ensure 12-month rolling emissions comply with the requirements of §106.4. When material is loaded, CyrusOne ensures there are no visible emissions, as required by the PBR in §106.472.
Genc1	106.472	09/04/2000	CyrusOne tracks monthly fuel usage to ensure 12-month rolling emissions comply with the requirements of §106.4. When material is loaded, CyrusOne ensures there are no visible emissions, as required by the PBR in §106.472.

Genc2	106.472	09/04/2000	CyrusOne tracks monthly fuel usage to ensure 12-month rolling emissions comply with the requirements of §106.4. When material is loaded, CyrusOne ensures there are no visible emissions, as required by the PBR in §106.472.
Gend1	106.472	09/04/2000	CyrusOne tracks monthly fuel usage to ensure 12-month rolling emissions comply with the requirements of §106.4. When material is loaded, CyrusOne ensures there are no visible emissions, as required by the PBR in §106.472.
Gend2	106.472	09/04/2000	CyrusOne tracks monthly fuel usage to ensure 12-month rolling emissions comply with the requirements of §106.4. When material is loaded, CyrusOne ensures there are no visible emissions, as required by the PBR in §106.472.
House1	106.472	09/04/2000	CyrusOne tracks monthly fuel usage to ensure 12-month rolling emissions comply with the requirements of §106.4. When material is loaded, CyrusOne ensures there are no visible emissions, as required by the PBR in §106.472.

OP-UA2 – Stationary Reciprocating Internal Combustion Engine Attributes

**Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 1)**

Federal Operating Permit Program

Table 1a: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)

**Subchapter B: Combustion Control at Major Industrial, Commercial, and Institutional Sources in Ozone Nonattainment Areas
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
08/13/2025	O4793	RN102414737

Unit ID No.	SOP/GOP Index No.	Horsepower Rating	RACT Date Placed in Service	Functionally Identical Replacement	Type of Service	Fuel Fired	Engine Type	ESAD Date Placed in Service	Diesel HP Rating
GRP-GENCRIT1	R7200-GENCRIT1	50+			EMERG	DSL			
GRP-GENCRIT2	R7200-GENCRIT2	50+			EMERG	DSL			
GEN - House	R7200-House	50+			EMERG	DSL			

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

Federal Operating Permit Program

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

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

Date	Permit No.	Regulated Entity No.
08/13/2025	O4793	RN102414737

Unit ID No.	SOP/GOP Index No.	HAP Source	Brake HP	Construction/ Reconstruction Date	Nonindustrial Emergency Engine	Service Type	Stationary RICE Type
GRP-GENCRIT1	63ZZZZ-GENCRIT1	AREA	500+	06+			
GRP-GENCRIT2	63ZZZZ-GENCRIT2	AREA	500+	06+			
GEN - House	63ZZZZ -House	AREA	300-500	06+			

**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.
08/13/2025	O4793	RN102414737

Unit ID No.	SOP/GOP Index No.	Applicability Date	Exemptions	Service	Commencing	Manufacture Date
GRP-GENCRIT1	60IIII-GENCRIT1	2005+	NONE	EMERG	CON	0406+
GRP-GENCRIT2	60IIII-GENCRIT2	2005+	NONE	EMERG	CON	0406+
GEN - House	60IIII -House	2005+	NONE	EMERG	CON	0406+

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

Federal Operating Permit Program

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

Subpart IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
08/13/2025	O4793	RN102414737

Unit ID No.	SOP/GOP Index No.	Diesel	AES No.	Displacement	Generator Set	Model Year	Install Date
GRP-GENCRIT1	60IIII-GENCRIT1	DIESEL		10-		2011	
GRP-GENCRIT2	60IIII-GENCRIT2	DIESEL		10-		2012	
GEN - House	60IIII -House	DIESEL		10-		2011	

**Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 12)**

Federal Operating Permit Program

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

Subpart IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
08/13/2025	O4793	RN102414737

Unit ID No.	SOP/GOP Index No.	Kilowatts	Filter	AECD	Standard	Compliance Option	PM Compliance	Options
GRP-GENCRIT1	60IIII-GENCRIT1	E2237+		No	No	MANU YES		
GRP-GENCRIT2	60IIII-GENCRIT2	E2237+		No	No	MANU YES		
GEN - House	60IIII -House	E130-368		No	No	MANU YES		

OP-UA3 – Storage Tank Vessel Attributes

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.
08/13/2025	04793	RN102414737

Unit ID No.	SOP/GOP Index No.	Alternate Control Requirement	ACR ID No.	Product Stored	Storage Capacity	Throughput	Potential to Emit	Uncontrolled Emissions
GRP-TANK	R5112-GRP-TANK	No		VOC1	A1K-25K			

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.
08/13/2025	04793	RN102414737

Unit ID No.	SOP/GOP Index No.	Construction Date	Tank Description	True Vapor Pressure	Primary Seal	Secondary Seal	Control Device Type	Control Device ID No.
GRP-TANK	R5112-GRP-TANK		NONE1	1-				

Steven Piper

From: eNotice TCEQ
Sent: Tuesday, July 22, 2025 2:42 PM
To: roland.gutierrez@senate.texas.gov; josey.garcia@house.texas.gov
Subject: TCEQ Notice - Permit Number O4793
Attachments: TCEQ Notice - O4793_38609.pdf

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

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

Questions regarding this email may be submitted either by replying directly to this email or by calling Mr. Rhyan Stone with the Air Permits Division at (512) 239-1293.

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

Brooke T. Paup, *Chairwoman*
Bobby Janecka, *Commissioner*
Catarina R. Gonzales, *Commissioner*
Kelly Keel, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 22, 2025

THE HONORABLE ROLAND GUTIERREZ
TEXAS SENATE
PO BOX 12068
AUSTIN TX 78711-2068

Re: Accepted Federal Operating Permit Initial Issuance Application
Project Number: 38609
Permit Number: O4793
CyrusOne LLC
Sat1
San Antonio, Bexar County
Regulated Entity Number: RN102414737
Customer Reference Number: CN604843086

Dear Senator Gutierrez:

This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) initial issuance application for a site located in your district. As part of this permitting process, the applicant is required to publish a formal newspaper public notice. The notice will inform the public of their right to make comments or request a public hearing. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. <https://gisweb.tceq.texas.gov/LocationMapper/?marker=-98.688083,29.466704&level=13>.

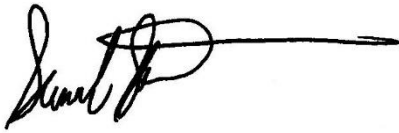
The FOP program regulates both new and existing major sources of emissions. The goal of the program is to improve air quality in Texas through increased compliance by codifying existing applicable regulatory requirements into the FOP. The FOP provides the applicant authorization to operate the equipment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

The Honorable Roland Gutierrez
Page 2
July 22, 2025

Re: Accepted Federal Operating Permit Initial Issuance Application

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

Sincerely,

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

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

Brooke T. Paup, *Chairwoman*
Bobby Janecka, *Commissioner*
Catarina R. Gonzales, *Commissioner*
Kelly Keel, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 22, 2025

THE HONORABLE JOSEY GARCIA
TEXAS HOUSE OF REPRESENTATIVES
PO BOX 2910
AUSTIN TX 78768-2910

Re: Accepted Federal Operating Permit Initial Issuance Application
Project Number: 38609
Permit Number: O4793
CyrusOne LLC
Sat1
San Antonio, Bexar County
Regulated Entity Number: RN102414737
Customer Reference Number: CN604843086

Dear Representative Garcia:

This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) initial issuance application for a site located in your district. As part of this permitting process, the applicant is required to publish a formal newspaper public notice. The notice will inform the public of their right to make comments or request a public hearing. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application.

<https://gisweb.tceq.texas.gov/LocationMapper/?marker=-98.688083,29.466704&level=13>.

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

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

Sincerely,

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

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

Texas Commission on Environmental Quality

Title V New

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	SAT1
Does the site have a physical address?	Yes
Physical Address	
Number and Street	9999 WESTOVER HILLS BLVD
City	SAN ANTONIO
State	TX
ZIP	78251
County	BEXAR
Latitude (N) (##.#####)	29.466704
Longitude (W) (-###.#####)	-98.688083
Primary SIC Code	
Secondary SIC Code	
Primary NAICS Code	518210
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN102414737
What is the name of the Regulated Entity (RE)?	STA1
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	9999 WESTOVER HILLS BLVD
City	SAN ANTONIO
State	TX
ZIP	78251
County	BEXAR
Latitude (N) (##.#####)	29.466704
Longitude (W) (-###.#####)	-98.688083
Facility NAICS Code	518210
What is the primary business of this entity?	DATA CENTER

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN604843086
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	CyrusOne LLC
Texas SOS Filing Number	801520887
Federal Tax ID	274286158
State Franchise Tax ID	32046019926
State Sales Tax ID	
Local Tax ID	
DUNS Number	19127739
Number of Employees	251-500
Independently Owned and Operated?	Yes

Responsible Official Contact

Person TCEQ should contact for questions about this application:	
Organization Name	CyrusOne LLC
Prefix	MR
First	Chris
Middle	
Last	Napier
Suffix	
Credentials	
Title	Vice President, Operations
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	2850 N HARWOOD ST
Routing (such as Mail Code, Dept., or Attn:)	Suite 2200
City	DALLAS
State	TX
ZIP	75201
Phone (###-###-####)	4808009207

Extension

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

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

E-mail

cnapier@cyrusone.com

Technical Contact

Person TCEQ should contact for questions about this application:

Same as another contact?

Organization Name

CyrusOne LLC

Prefix

MR

First

David

Middle

Last

Henderson

Suffix

Credentials

Title

STX Regional Operations Director

Enter new address or copy one from list:

Mailing Address

Address Type

Domestic

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

9999 WESTOVER HILLS BLVD

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

City

SAN ANTONIO

State

TX

ZIP

78251

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

3615329996

Extension

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

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

E-mail

dhenderson@cyrusone.com

Title V General Information - New

1) Permit Latitude Coordinate:

29 Deg 28 Min 0 Sec

2) Permit Longitude Coordinate:

98 Deg 41 Min 17 Sec

3) Is this submittal a new application or an update to an existing application?	New Application
3.1. What type of Federal Operating Permit are you applying for?	SOP
3.2. Is this submittal an abbreviated or a full application?	Full
3.3. Is this application for a portable facility?	No
3.4. Is the site a non-major source subject to the Federal Operating Permit Program?	No
3.5. Are there any permits that should be voided upon issuance of this permit application through permit conversion?	No
3.6. Are there any permits that should be voided upon issuance of this permit application through permit consolidation?	No
4) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	No

Title V Attachments New

Attach OP-1 (Site Information Summary)

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-SUM (Individual Unit Summary)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name

<a href=/ePermitsExternal/faces/file?
fileId=270187>FINAL_CyrusOne SAT1 Title V
Application_2025-0721.pdf

Hash

62E93216315DAAA69679DE2A54A0D3B7C9C3B588DBBC7690C3A4C1F729C2537E

MIME-Type

application/pdf

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

Expedite Title V

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

No

Certification

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

1. I am Randolph C Napier, the owner of the STEERS account ER115224.
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 New.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEQ.

OWNER OPERATOR Signature: Randolph C Napier OWNER OPERATOR

Account Number:

ER115224

Signature IP Address:

71.206.191.189

Signature Date:

2025-07-21

Signature Hash:	AF2E8B47DBF13979E8AD9CE7E5D55D63EE47C07D280FF49F8912F3DCAF10F8AD
Form Hash Code at time of Signature:	657C644F17B599380C98A7769D3703C0F05F69293B317C64F977D46F3D4A7246

Submission

Reference Number:	The application reference number is 802173
Submitted by:	The application was submitted by ER115224/Randolph C Napier
Submitted Timestamp:	The application was submitted on 2025-07-21 at 10:17:08 CDT
Submitted From:	The application was submitted from IP address 71.206.191.189
Confirmation Number:	The confirmation number is 665713
Steers Version:	The STEERS version is 6.92

Additional Information

Application Creator: This account was created by Luisa M Martin

Electronic delivery to R6AirPermitsTX@epa.gov

Environmental Protection Agency, Region 6
Air Permits Section (ARPE)
1201 Elm St., Suite 500
Dallas, Texas 75270

**RE: TITLE V OPERATING PERMIT INITIAL APPLICATION
CYRUSONE LLC, SAT1 SITE
SAN ANTONIO, BEXAR COUNTY, TEXAS
TCEQ REGULATED ENTITY NUMBER: RN102414737
TCEQ CUSTOMER NUMBER: CN604843086**

Date July 21, 2025

Dear Sir/Madam:

On behalf of CyrusOne LLC ("CyrusOne"), Ramboll Americas Engineering Solutions, Inc. (Ramboll) is submitting the enclosed initial Title V Operating Permit (TVOP) application for their SAT1 Site, located at 9999 Westover Hills Blvd, San Antonio, Bexar County, Texas. Effective July 22, 2024, the Bexar County area was re-classified as serious nonattainment for the 2015 8-hour ozone standard. As a result, the Title V major source threshold for oxides of nitrogen (NO_x) and volatile organic compounds (VOC) decreased to 50 tons per year (tpy). CyrusOne is permitted to emit 89.82 tpy of NO_x. As such, the site has been grandfathered in as an existing Title V major source and is therefore submitting this initial Title V application as required. CyrusOne is meeting the requirements for a timely application set forth in 30 TAC §122.130 by submitting this application prior to July 22, 2025 (i.e., no later than 12 months after an action by the Environmental Protection Agency (EPA) was announced).

Ramboll
10333 Richmond Avenue
Suite 910
Houston, TX 77042
USA

www.ramboll.com

The required forms for an initial TVOP application are included as attachments to this letter as follows:

- Attachment A – Facility Information
 - Area Map
 - Plot Plan
 - Process Flow Diagram
 - Process Description
- Attachment B – Potential Emissions Calculations
- Attachment C – Application Forms
 - OP-1 – Site Information Summary
 - OP-CRO1 – Certification by Responsible Official
 - OP-REQ1 – Application Area-Wide Applicability Determinations and General Information
 - OP-REQ2 - Negative Applicable Requirement Determinations Form
 - OP-REQ3 - Applicable Requirements Summary Form
 - OP-ACPS – Application Compliance Plan and Schedule

- OP-SUM – Individual Unit Summary
- OP-PBRSUP – Permits by Rule Supplemental Table
- OP-UA2 – Stationary Reciprocating Internal Combustion Engine Attributes
- OP-UA3 – Storage Tank Vessel Attributes
- PIP - Public Involvement Plan Form for Permit and Registration Applications

Additionally, a copy of this application was sent to the U.S. Environmental Protection Agency and the appropriate TCEQ regional office (TCEQ Region 13 – San Antonio). There are no local air pollution control programs for this facility.

Please contact CyrusOne's Director of Environmental Compliance, Laura Cottrell, at +1 603-793-0534 or by email at lcottrell@cyrusone.com, or me at +1 713-470-6653 or by email at rkorenek@ramboll.com if you have any questions or need additional information.

Sincerely,



Rachel Korenek

Managing Consultant, Air and Climate Change

D +1 713 470 6653
rkorenek@ramboll.com

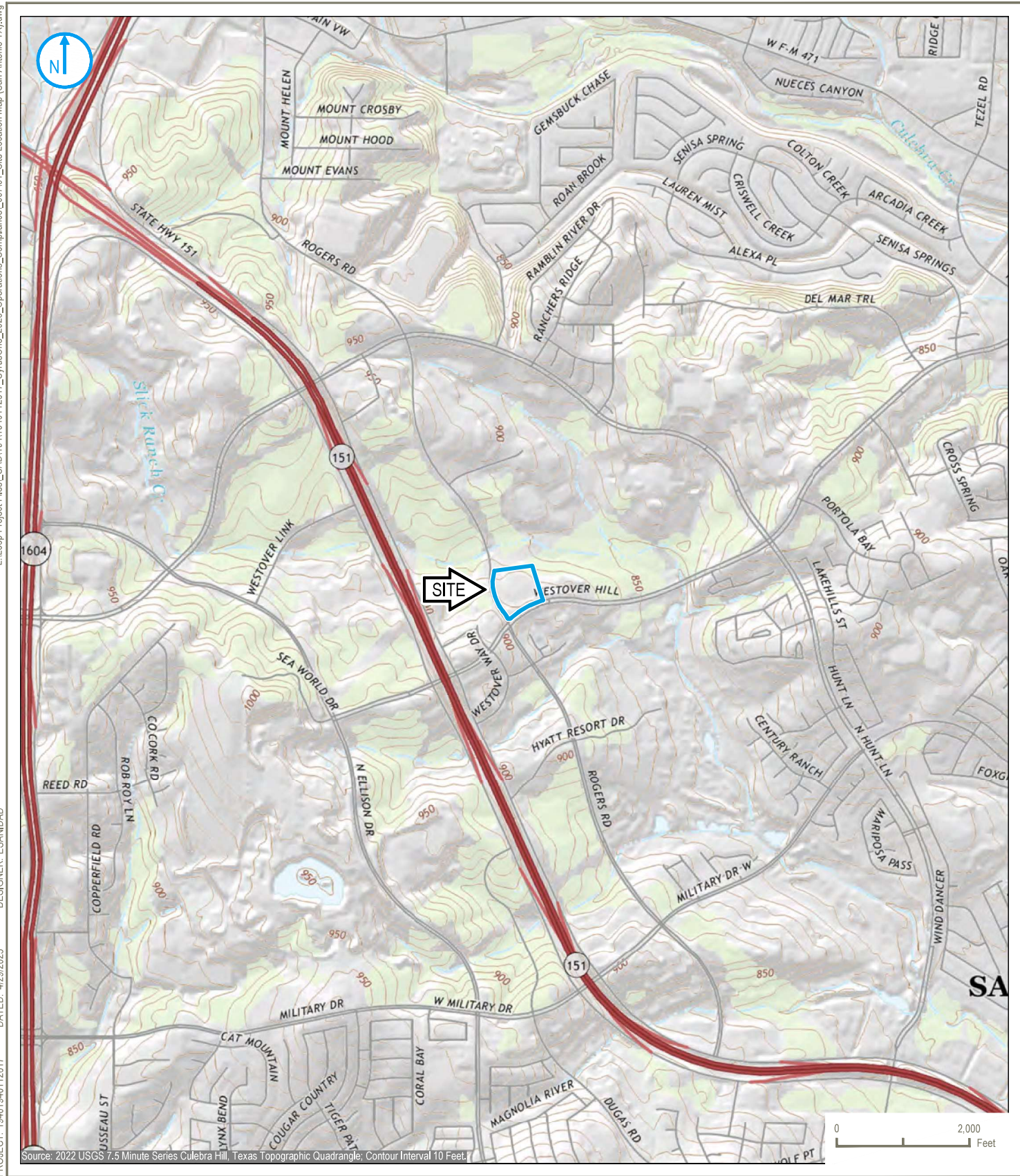
Enclosure

cc: Texas Commission on Environmental Quality, Regional Office, Region 13, Regional Director
George Ortiz, 14250 Judson Rd, San Antonio, Texas 78233-4480

Texas Commission on Environmental Quality, Air Permits Initial Review Team (APIRT), MC
163, 12100 Park 35 Circle, Building C, Third Floor, Austin, Texas 78753

ATTACHMENT A
FACILITY INFORMATION

AREA MAP



Map Scale: 1:24,000 | Map Center: 29°27'59.3641", -98°41'18.1507"

AREA MAP

FIGURE 01



KEY MAP

SAN ANTONIO I DATA CENTER
9999 WESTOVER HILLS BOULEVARD
SAN ANTONIO, TEXAS

RAMBOLL AMERICAS
ENGINEERING SOLUTIONS, INC.
A RAMBOLL COMPANY

RAMBOLL

PLOT PLAN



- PROPERTY BOUNDARY (APPROXIMATE)
- GENERATOR

PLOT PLAN

FIGURE 02

SAN ANTONIO I DATA CENTER
9999 WESTOVER HILLS BOULEVARD
SAN ANTONIO, TEXAS

RAMBOLL AMERICAS
ENGINEERING SOLUTIONS, INC.
A RAMBOLL COMPANY



PROCESS FLOW DIAGRAM

PROCESS FLOW DIAGRAMS

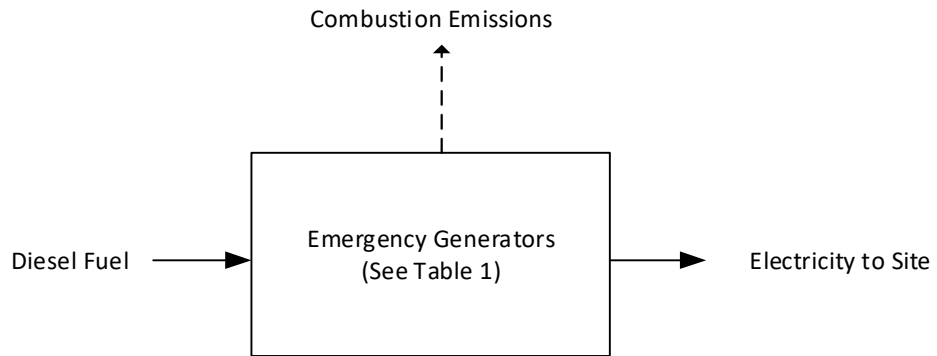


Figure 3. Process Flow Diagram for Emergency Engines

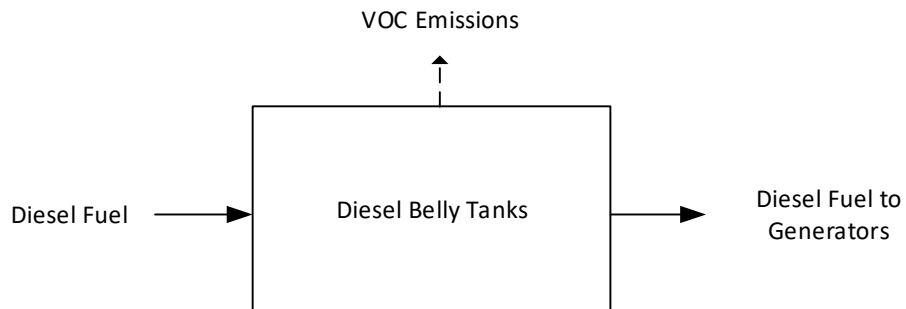


Figure 4. Process Flow Diagram for Diesel Belly Tanks

PROCESS DESCRIPTION

PROCESS DESCRIPTION

CyrusOne owns and operates the SAT1 data center ("the site" or "the facility"), located at 9999 Westover Hills Blvd, San Antonio, Bexar County, Texas. The facility includes the use of emergency generators to provide backup electricity for the facility's operations in the event of an emergency or power loss from the utility provider. The units also operate periodically to perform maintenance and readiness testing checks and to meet the federal New Source Performance Standards (NSPS) subpart IIII requirements. Each emergency generator has an associated diesel belly tank. Process flow diagrams for operation of the generators and belly tanks are presented in an earlier portion of this attachment (Figures 3 and 4).

By submitting this application, CyrusOne is establishing SAT1 as a Title V major source due to the change in National Ambient Air Quality Standards (NAAQS) nonattainment status. The site's operations will ensure that VOC and all other criteria pollutants will remain below the Title V major source thresholds. Bexar County is in attainment for CO, PM, and SO₂.

There are no stationary combustion sources at the site other than the emergency backup generators. The only other stationary sources of VOC or particulate emissions will be the facility's diesel belly tanks. A list of the generator IDs associated with each engine is shown in **Table 1**.

Table 1. Emergency Generators at SAT1

EPN	Installation Date	Generator Make and Model	Associated Diesel Belly Tanks
ENG1-SAI	2011	MTU 16V4000G83	TANK A-1
ENG2-SAI	2011	MTU 16V4000G83	TANK B-1
ENG3-SAI	2011	MTU 16V4000G83	TANK C-1
ENG4-SAI	2012	MTU 16V4000G83	TANK D-1
ENG5-SAI	2012	MTU 16V4000G83	TANK A-2
ENG6-SAI	2012	MTU 16V4000G83	TANK B-2
ENG7-SAI	2012	MTU 16V4000G83	TANK C-2
ENG8-SAI	2012	MTU 16V4000G83	TANK D-2
ENG9-SAI	2011	MTU 6R1600G80S	TANK-House

ATTACHMENT B
POTENTIAL EMISSIONS CALCULATIONS

Potential Emissions for Emergency Generators

Emergency Generator and Fuel Parameters

Generator Manufacturer		MTU	MTU
Engine Model		16V4000G83	6R1600G80S
Unit Names		See application letter	See application letter
Generator Power Output (kW)	^a	2,250	300
Rated Engine Power Output (kW)		2,499	343
Rated Engine Power Output (bhp)	^a	3,352	460
Fuel Input (MMBTU/hr)		23.46	3.22
Total Number of Generators	^a	8	1
Individual Annual Hours of Operation (hours)	^a	600	600
Grouped Annual Hours of Operation (hours)		4,800	600

^a According to data provided by CyrusOne. Engine data confirmed from MTU.

Constants and Unit Conversions

Average brake-specific fuel consumption (BSFC) ^b	7,000	Btu/hp-hr
Average Heating Value of Diesel ^b	19,300	Btu/lb
Density of Diesel ^b	7.1	lb/gal
	1,34048	hp/kW (electric)
	2,000	lbs/ton
	1,000,000	btu/MMBTU
	453.59	grams/lb

Emission Factors

Pollutant	EPA AP-42		Engine Model	
			MTU	
			16V4000G83	
			g/kW-hr	
Engine Model		MTU		
6R1600G80S		g/kW-hr		
Criteria Pollutants				
NOx	0.024	lb/hp-hr ^c	6.7	5.4
CO	0.0055	lb/hp-hr ^c	0.7	0.7
SOx	0.0004	lb/hp-hr ^c	0.002	0.149
PM	0.0007	lb/hp-hr ^c	0.05	0.06
PM-10	0.0573	lb/MMBTU ^d	0.05	0.06
PM-2.5	0.0573	lb/MMBTU ^d	0.05	0.06
VOC (HC, TOC)	0.000705	lb/hp-hr ^c	0.09	0.15
CO2	1.16	lb/hp-hr ^c	657.9	658.4
Hazardous Air Pollutants (HAP)				
Benzene	7.76E-04	lb/MMBTu ^e	-	-
Toluene	2.81E-04	lb/MMBTu ^e	-	-
Xylenes	1.93E-04	lb/MMBTu ^e	-	-
Formaldehyde	7.89E-05	lb/MMBTu ^e	-	-
Acetaldehyde	2.52E-05	lb/MMBTu ^e	-	-
Acrolein	7.88E-06	lb/MMBTu ^e	-	-
Naphthalene	1.30E-04	lb/MMBTu ^f	-	-
Highly Reactive Volatile Organic Compounds (HRVOC)				
Propylene	2.79E-03	lb/MMBTu ^g	-	-

Emission Calculations - Potential to Emit (lbs/hr)

Pollutant		Eight Generators, Model MTU 16V4000G83 2250kW	One Generator, Model MTU 6R1600G80S 300kW	Facility Wide Total
		lbs/hr	lbs/hr	lbs/hr
Criteria Pollutants				
	NOx	295.30	4.08	299.38
	CO	30.85	0.53	31.38
	SOx	0.09	0.11	0.20
	PM	2.20	0.05	2.25
	PM-10	2.20	0.05	2.25
	PM-2.5	2.20	0.05	2.25
	VOC (HC, TOC)	3.97	0.11	4.08
	CO2	28996.83	497.87	29494.70
Hazardous Air Pollutants (HAP)				
	Benzene	1.46E-01	2.50E-03	0.15
	Toluene	5.27E-02	9.04E-04	0.05
	Xylenes	3.62E-02	6.21E-04	0.04
	Formaldehyde	1.48E-02	2.54E-04	0.02
	Acetaldehyde	4.73E-03	8.11E-05	4.81E-03
	Acrolein	1.48E-03	2.54E-05	1.50E-03
	Naphthalene	2.44E-02	4.18E-04	0.02
	Total HAP	2.80E-01	4.80E-03	0.28
Highly Reactive Volatile Organic Compounds (HRVOC)				
	Propylene	5.24E-01	8.98E-03	0.53

Emission Calculations - Potential to Emit (tpy)

Pollutant		Eight Generators, Model MTU 16V4000G83 2250kW	One Generator, Model MTU 6R1600G80S 300kW	Facility Wide Total	Major Source Threshold	TCEQ Facility Threshold for PBR (Upper limit)
		tpy	tpy	tpy	tpy	tpy
Criteria Pollutants						
NOx		88.59	1.23	89.82	100	250
CO		9,256	0,159	9,41	100	250
SOx		0,0264	3,38E-02	6,02E-02	100	25
PM		0,661	0,014	0,67	100	25
PM-10		0,661	0,014	0,67	100	15
PM-2.5		0,661	0,014	0,67	100	10
VOC (HC, TOC)		1,190	0,034	1,22	100	25
CO2		8,699	149	8848,41	--	--
Hazardous Air Pollutants (HAP)						
Benzene		4,37E-02	7,49E-04	4,44E-02	25	25
Toluene		1,58E-02	2,71E-04	1,61E-02	25	25
Xylenes		1,09E-02	1,86E-04	1,11E-02	25	25
Formaldehyde		4,44E-03	7,62E-05	4,52E-03	25	25
Acetaldehyde		1,42E-03	2,43E-05	1,44E-03	25	25
Acrolein		4,44E-04	7,61E-06	4,51E-04	25	25
Naphthalene		7,32E-03	1,26E-04	7,45E-03	25	25
Total HAP		8,40E-02	1,44E-03	8,55E-02	10	--
Highly Reactive Volatile Organic Compounds (HRVOC)						
Propylene		1,57E-01	2,69E-03	1,60E-01	--	--

Notes:

^a Engine size and number of each generator model was provided by CyrusOne facility contact. Model specific emission rates were obtained from manufacturer's documentation provided by MTU Onsite. Manufacturer's emission rates were used for operations at 100% standby load. PM-2.5 and PM-10 emission rates were conservatively assumed to equal PM. Where model specific emission limits were not available, AP-42 was used. Hours of operation per year were increased to add flexibility and remain below the Major Source threshold.

^b Diesel fuel properties are from AP-42 Section 3.4, "Large Stationary Diesel And All Stationary Dual-fuel Engines."

^c Emission factors are from Table 3.4-1 from AP-42 Section 3.4, "Large Stationary Diesel And All Stationary Dual-fuel Engines" for engines greater than 600 hp. Conservatively assumed no NOx controls. Assumed Low Sulfur Diesel (LSD) is used with sulfur content of 500 ppm (0,05%). Assumed 100% conversion of carbon in fuel to CO₂ with 87 weight % carbon in diesel. N₂O and CH₄ emissions were assumed to be negligible with regard to permitting applicability analysis, and were not calculated.

^d Emission factors are from Table 3.4-2 from AP-42 Section 3.4, "Large Stationary Diesel And All Stationary Dual-fuel Engines" for engines greater than 600 hp for "Particulate and Particle-sizing Emission Factors for Large Uncontrolled Stationary Diesel Engines." PM-2,5 emission rates were conservatively assumed to equal PM-10.

^e Emission factors are from Table 3.4-3 from AP-42 Section 3.4, "Large Stationary Diesel And All Stationary Dual-fuel Engines" for engines greater than 600 hp for "Speciated Organic Compound Emission Factors for Large Uncontrolled Stationary Diesel Engines,"

^f Emission factors are from Table 3.4-4 from AP-42 Section 3.4, "Large Stationary Diesel And All Stationary Dual-fuel Engines" for engines greater than 600 hp for "PAH Emission Factors for Large Uncontrolled Stationary Diesel Engines,"

Abbreviations:

Btu = British thermal Units
lb = pound(s)
gal = gallon
kW = kilowatt
hr = hours

hp = horsepower
MMBTU = Million British thermal Units
g = grams
tpy = tons per year

ATTACHMENT C
APPLICATION FORMS

OP-1 – Site Information Summary

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

Please print or type all information. Direct any questions regarding this application form to the Air Permits Division at (512) 239-1250 or to the Texas Commission on Environmental Quality, Office of Air, Air-Permits Division (MC 163), P.O. Box 13087, Austin, Texas 78711-3087.

I. Company Identifying Information	
A. Company Name: CyrusOne LLC	
B. Customer Reference Number (CN): CN 604843086	
C. Submittal Date (mm/dd/yyyy): 07/21/2025	
II. Site Information	
A. Site Name: SAT1	
B. Regulated Entity Reference Number (RN): RN 102414737	
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: Chris Napier
RO Title: Vice President, Operations
Employer Name: CyrusOne LLC
Mailing Address: 2850 N Harwood Street, Suite 2200
City: Dallas
State: TX
ZIP Code: 75201
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 480-800-9207
Fax No.:
Email: cnapier@cyrusone.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: David Henderson
Technical Contact Title: STX Regional Operations Director
Employer Name: CyrusOne LLC
Mailing Address: 9999 Westover Hills Blvd
City: San Antonio
State: TX
ZIP Code: 78251
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (361) 532-9996
Fax No.:
Email: dhenderson@cyrusone.com
VIII. Reference Only Requirements <i>(For reference only.)</i>
A. State Senator: Roland Gutierrez
B. State Representative: Josey Garcia
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: SAT1
B. Physical Address: 9999 WESTOVER HILLS BLVD
City: San Antonio
State: TX
ZIP Code: 78251
C. Physical Location:
D. Nearest City:
E. State:
F. ZIP Code:

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

X. Application Area Information (continued)
G. Latitude (nearest second): 29:27:59 N
H. Longitude (nearest second): 98:41:18 W
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: 18
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 13 Office
B. Physical Address: 14250 Judson Rd
City: San Antonio
ZIP Code: 78233
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: Laura Cottrell
Contact Mailing Address: 2850 N Harwood Street, Suite 2200
City: Dallas
State: TX
ZIP Code: 75201
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (603) 793-0534

OP-CRO1 – Certification by Responsible Official

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: 102414737
CN: 604843086
Account No.:
Permit No.: TBA
Project No.: TBA
Area Name: SAT1
Company Name: CyrusOne 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
This certification does not extend to information which is designated by TCEQ as information for reference only.
I, <u>Chris Napier</u> certify that I am the <u>Responsible Official (RO)</u> <i>(Certifier Name printed or typed)</i><i>(RO or DAR)</i>
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete: <i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>
Time Period: From <u>April 10, 2025</u> to <u>July 22, 2025</u> <i>(Start Date)</i><i>(End Date)</i>
Specific Dates: _____ <i>(Date 1)</i><i>(Date 2)</i><i>(Date 3)</i><i>(Date 4)</i>
_____ <i>(Date 5)</i><i>(Date 6)</i>
Signature: _____ Signature Date: _____ _____
Title: <u>Vice President, Operations</u>

OP-REQ1 – Application Area-Wide Applicability Determinations and General Information

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.
7/21/2025	TBA	RN102414737

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.
7/21/2025	TBA	RN102414737

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.
7/21/2025	TBA	RN102414737

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.
7/21/2025	TBA	RN102414737

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.
7/21/2025	TBA	RN102414737

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
Form OP-REQ1 (Page 6)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

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
Form OP-REQ1 (Page 7)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

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.
7/21/2025	TBA	RN102414737

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
Form OP-REQ1 (Page 9)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

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
Form OP-REQ1 (Page 10)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

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
Form OP-REQ1 (Page 11)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 12)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

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)		
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 13)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 14)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 15)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

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

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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 16)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 17)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 18)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

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

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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 19)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 20)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 21)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

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

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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 22)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

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

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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 23)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

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

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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 24)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

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

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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 25)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

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

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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 26)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

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

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	
<i>Applicability</i>	
1. The application area includes sources, operations, or activities specified in 40 CFR §§ 61.143, 61.144, 61.146, 61.147, 61.148, or 61.155. <i>If the response to Question VII.E.1 is "No," go to Section VII.F.</i>	☐ Yes ☐ No
<i>Roadway Construction</i>	
2. The application area includes roadways constructed or maintained with asbestos tailings or asbestos-containing waste material.	☐ Yes ☐ No
<i>Manufacturing Commercial Asbestos</i>	
3. The application area includes a manufacturing operation using commercial asbestos. <i>If the response to Question VII.E.3 is "No," go to Question VII.E.4.</i>	☐ 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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 27)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

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

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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 28)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

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

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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 29)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

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

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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 30)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

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

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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 31)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

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

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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 32)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

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

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>Container Requirements</i>	
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
<i>Individual Drain Systems</i>	
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 33)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

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

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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 34)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)	
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 35)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)		
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 36)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)		
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 37)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)	
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 38)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)		
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>		
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 39)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)	
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 40)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)	
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 41)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)		
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 42)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)		
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 43)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)	
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 44)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)	
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 45)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)		
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 46)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)	
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 47)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)	
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 48)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)		
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 49)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)	
N. Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries (continued)	
<i>Applicability (continued)</i>	
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 50)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)		
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 51)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)		
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 52)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)	
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 53)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 54)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)		
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 55)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)		
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 56)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)		
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 57)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)		
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 58)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)	
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 59)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)	
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 60)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)		
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 61)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)	
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 62)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)		
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 63)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)	
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 64)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)		
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	

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 65)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)		
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 66)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)	
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 67)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)	
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 68)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)		
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 69)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)	
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 70)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)		
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 71)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)	
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 72)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)	
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 73)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)

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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 74)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)	
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 75)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)		
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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 76)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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)		
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.	Subpart ZZZZ

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 77)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

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

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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 78)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

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

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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 79)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 80)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

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

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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 81)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 82)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 83)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 84)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 85)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 86)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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

Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 87)
Federal Operating Permit Program
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

◆ 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

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

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

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

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

E. PSD Permits and PSD Major Pollutants

Permit No.	Issuance Date	Pollutant(s):	Permit No.	Issuance Date	Pollutant(s):
N/A					

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):
N/A					

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
N/A					

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

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Authorization No.	Issuance Date	Authorization No.	Issuance Date	Authorization No.	Issuance Date
N/A					

- ◆ **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
1556744	INITIAL/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
N/A					

OP-REQ2 - Negative Applicable Requirement Determinations Form

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

Date		Permit No.			Regulated Entity No.	
7/21/2025		TBA			RN102414737	
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
		GRP-TANK	UA3	NSPS Subpart K	§60.110	The diesel belly tanks at the SAT1 facility are new units constructed after 1978 with a storage capacity less than 40,000 gallons. Therefore, NSPS Subpart K does not apply.
		GRP-TANK	UA3	NSPS Subpart Ka	§60.110a	The diesel belly tanks at the SAT1 facility are new units constructed after 1984 with a storage capacity less than 40,000 gallons. Therefore, NSPS Subpart Ka does not apply.
		GRP-TANK	UA3	NSPS Subpart Kb	§60.110b(b)	The diesel belly tanks at the SAT1 facility have a storage capacity less than 19,812.9 gallons. Additionally, diesel fuel has a maximum true vapor pressure less than 2.2 psia. Therefore, NSPS Subpart Kb does not apply.
		GRP-GEN	UA2	30 TAC Chapter 117 Subchapter B	§117.200	The generator engines at the SAT1 facility are diesel-fired compression ignition engines. Additionally, the generators are operated exclusively in emergency situations, and maintenance and testing operations are limited to 100 hours per year. Therefore, 30 TAC Chapter 117 Subchapter B does not apply.

OP-REQ3 - Applicable Requirements Summary Form

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

Table 1a: Additions

Date: 07/21/2025	Regulated Entity No.: RN102414737	Permit No.: TBD
Company Name: CyrusOne, LLC	Area Name: SAT1	

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)
	GRP-TANK	UA3	R5112-GRP-TANK	VOC	Chapter 115	§115.118(a)(1) §115.118(a)(7)

OP-ACPS – Application Compliance Plan and Schedule

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

Date: 07/21/2025	Regulated Entity No.: RN102414737	Permit No.: TBA
Company Name: CyrusOne LLC		Area Name: SAT1

- 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>	0
* 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.	

OP-SUM – Individual Unit Summary

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

Table 1

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

Unit/Process ID No.	Applicable Form	Unit Name/Description	CAM	Preconstruction Authorizations 30 TAC Chapter 116/30 TAC Chapter 106	Preconstruction Authorizations Title I	Group ID No.
GEN A-1	OP-UA2	Emergency Critical Generator 1 ENG1-SAI		106.511/09/04/2000[155674]		GRP-GEN
GEN B-1	OP-UA2	Emergency Critical Generator 2 ENG2-SAI		106.511/09/04/2000[155674]		GRP-GEN
GEN C-1	OP-UA2	Emergency Critical Generator 3 ENG3-SAI		106.511/09/04/2000[155674]		GRP-GEN
GEN D-1	OP-UA2	Emergency Critical Generator 4 ENG4-SAI		106.511/09/04/2000[155674]		GRP-GEN
GEN A-2	OP-UA2	Emergency Critical Generator 5 ENG5-SAI		106.511/09/04/2000[155674]		GRP-GEN
GEN B-2	OP-UA2	Emergency Critical Generator 6 ENG6-SAI		106.511/09/04/2000[155674]		GRP-GEN
GEN C-2	OP-UA2	Emergency Critical Generator 7 ENG7-SAI		106.511/09/04/2000[155674]		GRP-GEN
GEN D-2	OP-UA2	Emergency Critical Generator 8 ENG8-SAI		106.511/09/04/2000[155674]		GRP-GEN
GEN - House	OP-UA2	Emergency House Generator 1 ENG9-SAI		106.511/09/04/2000[155674]		GRP-GEN

TANK A-1	OP-UA3	Diesel Belly Tank 1 Gena1		106.472/09/04/2000		GRP-TANK
TANK B-1	OP-UA3	Diesel Belly Tank 2 Gena2		106.472/09/04/2000		GRP-TANK
TANK C-1	OP-UA3	Diesel Belly Tank 3 Genb1		106.472/09/04/2000		GRP-TANK
TANK D-1	OP-UA3	Diesel Belly Tank 4 Genb2		106.472/09/04/2000		GRP-TANK
TANK A-2	OP-UA3	Diesel Belly Tank 5 Genc1		106.472/09/04/2000		GRP-TANK
TANK B-2	OP-UA3	Diesel Belly Tank 6 Genc2		106.472/09/04/2000		GRP-TANK
TANK C-2	OP-UA3	Diesel Belly Tank 7 Gend1		106.472/09/04/2000		GRP-TANK
TANK D-2	OP-UA3	Diesel Belly Tank 8 Gend2		106.472/09/04/2000		GRP-TANK
TANK - House	OP-UA3	Diesel Belly Tank 9 House1		106.472/09/04/2000		GRP-TANK

OP-PBRSUP – Permits by Rule Supplemental Table

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

Date	Permit Number	Regulated Entity Number
7/21/2025	TBA	RN102414737

Unit ID No.	Registration No.	PBR No.	Registration Date
ENG1-SAI	155674	106.511	03/08/2019
ENG2-SAI	155674	106.511	03/08/2019
ENG3-SAI	155674	106.511	03/08/2019
ENG4-SAI	155674	106.511	03/08/2019
ENG5-SAI	155674	106.511	03/08/2019
ENG6-SAI	155674	106.511	03/08/2019
ENG7-SAI	155674	106.511	03/08/2019
ENG8-SAI	155674	106.511	03/08/2019
ENG9-SAI	155674	106.511	03/08/2019

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

Date	Permit Number	Regulated Entity Number
7/21/2025	TBA	RN102414737

Unit ID No.	PBR No.	Version No./Date
Gena1	106.472	09/04/2000
Gena2	106.472	09/04/2000
Genb1	106.472	09/04/2000
Genb2	106.472	09/04/2000
Genc1	106.472	09/04/2000
Genc2	106.472	09/04/2000
Gend1	106.472	09/04/2000
Gend2	106.472	09/04/2000
House1	106.472	09/04/2000

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

Date	Permit Number	Regulated Entity Number
7/21/2025	TBA	RN102414737

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
ENG1-SAI	106.511	155674	CyrusOne established a federally enforceable limit of 89.82 tpy NO _x on an aggregate, 12-month rolling basis for these emergency generators. With the proposed NO _x limitation, emissions of CO, VOC, and PM (filterable)/PM ₁₀ /PM _{2.5} , SO ₂ and HAPs will inherently be limited to below PBR and Major Source thresholds. CyrusOne will maintain on-site records of the monthly 12-month rolling total of NO _x emissions from all generators. Additionally, no individual generator will operate for more than 10% of the normal annual operating schedule for the data center, or 876 hours annually, as required by the PBR in §106.511.
ENG2-SAI	106.511	155674	
ENG3-SAI	106.511	155674	
ENG4-SAI	106.511	155674	
ENG5-SAI	106.511	155674	
ENG6-SAI	106.511	155674	
ENG7-SAI	106.511	155674	
ENG8-SAI	106.511	155674	
ENG9-SAI	106.511	155674	

OP-UA2 – Stationary Reciprocating Internal Combustion Engine Attributes

**Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 1)**

Federal Operating Permit Program

Table 1a: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)

**Subchapter B: Combustion Control at Major Industrial, Commercial, and Institutional Sources in Ozone Nonattainment Areas
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

Unit ID No.	SOP/GOP Index No.	Horsepower Rating	RACT Date Placed in Service	Functionally Identical Replacement	Type of Service	Fuel Fired	Engine Type	ESAD Date Placed in Service	Diesel HP Rating
GEN A-1	R7200-GEN A-1	50+			EMERG	DSL			
GEN B-1	R7200-GEN B-1	50+			EMERG	DSL			
GEN C-1	R7200-GEN C-1	50+			EMERG	DSL			
GEN D-1	R7200-GEN D-1	50+			EMERG	DSL			
GEN A-2	R7200-GEN A-2	50+			EMERG	DSL			
GEN B-2	R7200-GEN B-2	50+			EMERG	DSL			
GEN C-2	R7200-GEN C-2	50+			EMERG	DSL			
GEN D-2	R7200-GEN D-2	50+			EMERG	DSL			
GEN - House	R7200-House	50+			EMERG	DSL			

**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.
7/21/2025	TBA	RN102414737

Unit ID No.	SOP/GOP Index No.	HAP Source	Brake HP	Construction/ Reconstruction Date	Nonindustrial Emergency Engine	Service Type	Stationary RICE Type
GEN A-1	63ZZZZ-GEN A-1	AREA	500+	06+			
GEN B-1	63ZZZZ -GEN B-1	AREA	500+	06+			
GEN C-1	63ZZZZ -GEN C-1	AREA	500+	06+			
GEN D-1	63ZZZZ -GEN D-1	AREA	500+	06+			
GEN A-2	63ZZZZ -GEN A-2	AREA	500+	06+			
GEN B-2	63ZZZZ -GEN B-2	AREA	500+	06+			
GEN C-2	63ZZZZ -GEN C-2	AREA	500+	06+			
GEN D-2	63ZZZZ -GEN D-2	AREA	500+	06+			
GEN - House	63ZZZZ -House	AREA	300-500	06+			

**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.
7/21/2025	TBA	RN102414737

Unit ID No.	SOP/GOP Index No.	Applicability Date	Exemptions	Service	Commencing	Manufacture Date
GEN A-1	60IIII-GEN A-1	2005+	NONE	EMERG	CON	0406+
GEN B-1	60IIII-GEN B-1	2005+	NONE	EMERG	CON	0406+
GEN C-1	60IIII-GEN C-1	2005+	NONE	EMERG	CON	0406+
GEN D-1	60IIII-GEN D-1	2005+	NONE	EMERG	CON	0406+
GEN A-2	60IIII-GEN A-2	2005+	NONE	EMERG	CON	0406+
GEN B-2	60IIII-GEN B-2	2005+	NONE	EMERG	CON	0406+
GEN C-2	60IIII-GEN C-2	2005+	NONE	EMERG	CON	0406+
GEN D-2	60IIII-GEN D-2	2005+	NONE	EMERG	CON	0406+
GEN - House	60IIII -House	2005+	NONE	EMERG	CON	0406+

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

Federal Operating Permit Program

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

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

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

Unit ID No.	SOP/GOP Index No.	Diesel	AES No.	Displacement	Generator Set	Model Year	Install Date
GEN A-1	60IIII-GEN A-1	DIESEL		10-		2011	
GEN B-1	60IIII-GEN B-1	DIESEL		10-		2011	
GEN C-1	60IIII-GEN C-1	DIESEL		10-		2011	
GEN D-1	60IIII-GEN D-1	DIESEL		10-		2012	
GEN A-2	60IIII-GEN A-2	DIESEL		10-		2012	
GEN B-2	60IIII-GEN B-2	DIESEL		10-		2012	
GEN C-2	60IIII-GEN C-2	DIESEL		10-		2012	
GEN D-2	60IIII-GEN D-2	DIESEL		10-		2012	
GEN - House	60IIII -House	DIESEL		10-		2011	

**Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 12)**

Federal Operating Permit Program

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

Subpart IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
7/21/2025	TBA	RN102414737

Unit ID No.	SOP/GOP Index No.	Kilowatts	Filter	AECD	Standard	Compliance Option	PM Compliance	Options
GEN A-1	60IIII-GEN A-1	E2237+		No	Yes	MANU YES		
GEN B-1	60IIII-GEN B-1	E2237+		No	Yes	MANU YES		
GEN C-1	60IIII-GEN C-1	E2237+		No	Yes	MANU YES		
GEN D-1	60IIII-GEN D-1	E2237+		No	Yes	MANU YES		
GEN A-2	60IIII-GEN A-2	E2237+		No	Yes	MANU YES		
GEN B-2	60IIII-GEN B-2	E2237+		No	Yes	MANU YES		
GEN C-2	60IIII-GEN C-2	E2237+		No	Yes	MANU YES		
GEN D-2	60IIII-GEN D-2	E2237+		No	Yes	MANU YES		
GEN - House	60IIII -House	E130-368		No	Yes	MANU YES		

OP-UA3 – Storage Tank Vessel Attributes

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.
7/21/2025	TBA	RN102414737

Unit ID No.	SOP/GOP Index No.	Alternate Control Requirement	ACR ID No.	Product Stored	Storage Capacity	Throughput	Potential to Emit	Uncontrolled Emissions
TANK A-1	R5112- TANK A-1	No		VOC2	C1K-25K			
TANK B-1	R5112- TANK B-1	No		VOC2	C1K-25K			
TANK C-1	R5112- TANK C-1	No		VOC2	C1K-25K			
TANK D-1	R5112- TANK D-1	No		VOC2	C1K-25K			
TANK A-2	R5112- TANK A-2	No		VOC2	C1K-25K			
TANK B-2	R5112- TANK B-2	No		VOC2	C1K-25K			
TANK C-2	R5112- TANK C-2	No		VOC2	C1K-25K			
TANK D-2	R5112- TANK D-2	No		VOC2	C1K-25K			
TANK - House	R5112-House	No		VOC2	C1K-25K			

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.
7/21/2025	TBA	RN102414737

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.
TANK A-1	R5112- TANK A-1	73+	NONE2	1.5-B				
TANK B-1	R5112- TANK B-1	73+	NONE2	1.5-B				
TANK C-1	R5112- TANK C-1	73+	NONE2	1.5-B				
TANK D-1	R5112- TANK D-1	73+	NONE2	1.5-B				
TANK A-2	R5112- TANK A-2	73+	NONE2	1.5-B				
TANK B-2	R5112- TANK B-2	73+	NONE2	1.5-B				
TANK C-2	R5112- TANK C-2	73+	NONE2	1.5-B				
TANK D-2	R5112- TANK D-2	73+	NONE2	1.5-B				
TANK - House	R5112-House	73+	NONE2	1.5-B				

PIP - Public Involvement Plan Form for Permit and Registration Applications



Texas Commission on Environmental Quality

Public Involvement Plan Form for Permit and Registration Applications

The Public Involvement Plan is intended to provide applicants and the agency with information about how public outreach will be accomplished for certain types of applications in certain geographical areas of the state. It is intended to apply to new activities; major changes at existing plants, facilities, and processes; and to activities which are likely to have significant interest from the public. This preliminary screening is designed to identify applications that will benefit from an initial assessment of the need for enhanced public outreach.

All applicable sections of this form should be completed and submitted with the permit or registration application. For instructions on how to complete this form, see TCEQ-20960-inst.

Section 1. Preliminary Screening

- ☒ New Permit or Registration Application
☐ New Activity - modification, registration, amendment, facility, etc. (see instructions)

If neither of the above boxes are checked, completion of the form is not required and does not need to be submitted.

Section 2. Secondary Screening

- ☒ Requires public notice,
☒ Considered to have significant public interest, **and**
☒ Located within any of the following geographical locations:

- Austin
- Dallas
- Fort Worth
- Houston
- San Antonio
- West Texas
- Texas Panhandle
- Along the Texas/Mexico Border
- Other geographical locations should be decided on a case-by-case basis

**If all the above boxes are not checked, a Public Involvement Plan is not necessary.
Stop after Section 2 and submit the form.**

- ☐ Public Involvement Plan not applicable to this application. Provide **brief** explanation.

Section 3. Application Information

Type of Application (check all that apply):

Air ☒ Initial ☒ Federal ☐ Amendment ☐ Standard Permit ☒ Title V
Waste ☐ Municipal Solid Waste ☐ Industrial and Hazardous Waste ☐ Scrap Tire
☐ Radioactive Material Licensing ☐ Underground Injection Control

Water Quality

☐ Texas Pollutant Discharge Elimination System (TPDES)
☐ Texas Land Application Permit (TLAP)
☐ State Only Concentrated Animal Feeding Operation (CAFO)
☐ Water Treatment Plant Residuals Disposal Permit
☐ Class B Biosolids Land Application Permit
☐ Domestic Septage Land Application Registration

Water Rights New Permit

☐ New Appropriation of Water
☐ New or existing reservoir

Amendment to an Existing Water Right

☐ Add a New Appropriation of Water
☐ Add a New or Existing Reservoir
☐ Major Amendment that could affect other water rights or the environment

Section 4. Plain Language Summary

Provide a brief description of planned activities.

The facility provides a data processing and storage space for clients. Emergency generators and associated belly tanks provide electricity for the site's operations in the event of an emergency.

Section 5. Community and Demographic Information

Community information can be found using EPA's EJ Screen, U.S. Census Bureau information, or generally available demographic tools.

Information gathered in this section can assist with the determination of whether alternative language notice is necessary. Please provide the following information.

San Antonio

(City)

Bexar

(County)

1719.12

(Census Tract)

Please indicate which of these three is the level used for gathering the following information.

☐

City

☒

County

☐

Census Tract

(a) Percent of people over 25 years of age who at least graduated from high school

86.8%

(b) Per capita income for population near the specified location

\$35,066

(c) Percent of minority population and percent of population by race within the specified location

One Race, Non-Hispanic - Black: 7.6%; American Indian: 0.1%; Asian: 3.2%; Native Hawaiian and Other Pacific Islander: 0.2% // Hispanic or Latino only - 59.8%

(d) Percent of Linguistically Isolated Households by language within the specified location

Linguistically Isolated Households: 6% total (88% Spanish, 3% other Indo-European, 7% Asian-Pacific Island, and 2% other)

(e) Languages commonly spoken in area by percentage

English only: 62.9% // Other, non-English Languages: Spanish 32.9%; Other Indo-European 1.6%; Asian and Pacific Island 1.9%; Other 0.7%

(f) Community and/or Stakeholder Groups

Information not available.

(g) Historic public interest or involvement

Information not available.

Section 6. Planned Public Outreach Activities

(a) Is this application subject to the public participation requirements of Title 30 Texas Administrative Code (30 TAC) Chapter 39?

☒ Yes ☐ No

(b) If yes, do you intend at this time to provide public outreach other than what is required by rule?

☐ Yes ☒ No

If Yes, please describe.

If you answered "yes" that this application is subject to 30 TAC Chapter 39, answering the remaining questions in Section 6 is not required.

(c) Will you provide notice of this application in alternative languages?

☒ Yes ☐ No

Please refer to Section 5. If more than 5% of the population potentially affected by your application is Limited English Proficient, then you are required to provide notice in the alternative language.

If yes, how will you provide notice in alternative languages?

- ☒ Publish in alternative language newspaper
☐ Posted on Commissioner's Integrated Database Website
☐ Mailed by TCEQ's Office of the Chief Clerk
☐ Other (specify)

(d) Is there an opportunity for some type of public meeting, including after notice?

☐ Yes ☒ No

(e) If a public meeting is held, will a translator be provided if requested?

☐ Yes ☐ No

(f) Hard copies of the application will be available at the following (check all that apply):

- ☒ TCEQ Regional Office ☐ TCEQ Central Office
☐ Public Place (specify)

Section 7. Voluntary Submittal

For applicants voluntarily providing this Public Involvement Plan, who are not subject to formal public participation requirements.

Will you provide notice of this application, including notice in alternative languages?

☐ Yes ☐ No

What types of notice will be provided?

- ☐ Publish in alternative language newspaper
☐ Posted on Commissioner's Integrated Database Website
☐ Mailed by TCEQ's Office of the Chief Clerk
☐ Other (specify)