

Texas Commission on Environmental Quality

Title V Existing

1729

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	TRANSCO RAILWAY PRODUCTS
County	HARRIS
Latitude (N) (##.#####)	29.8675
Longitude (W) (-###.#####)	95.143055
Primary SIC Code	4789
Secondary SIC Code	
Primary NAICS Code	488210
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN100212828
What is the name of the Regulated Entity (RE)?	TRANSCO RAILWAY PRODUCTS
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	16923 OLD BEAUMONT HWY 90
City	HOUSTON
State	TX
ZIP	77049
County	HARRIS
Latitude (N) (##.#####)	29.865
Longitude (W) (-###.#####)	-95.118055
Facility NAICS Code	
What is the primary business of this entity?	MANUFACTURING OF RAIL ROAD TANK CAR

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN600126395
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Union Tank Car Company
Texas SOS Filing Number	5623506
Federal Tax ID	361034688
State Franchise Tax ID	13631046888
State Sales Tax ID	
Local Tax ID	
DUNS Number	5161112
Number of Employees	101-250
Independently Owned and Operated?	No

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	UTLX
Prefix	MR
First	brandon
Middle	
Last	howard
Suffix	
Credentials	
Title	Environmental Manager
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	16923 BEAUMONT HWY
Routing (such as Mail Code, Dept., or Attn:)	
City	HOUSTON
State	TX
ZIP	77049
Phone (###-###-####)	9047080372
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	brandon.howard@marmonrail.com

Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application

Select existing DAR contact or enter a new contact.	New Contact
Organization Name	UTLX
Prefix	MR
First	brandon
Middle	
Last	howard
Suffix	
Credentials	
Title	Environmental Manager
Enter new address or copy one from list	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	16923 BEAUMONT HWY
Routing (such as Mail Code, Dept., or Attn:)	
City	HOUSTON
State	TX
Zip	77049
Phone (###-###-####)	9047080372

Extension

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

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

E-mail

brandon.howard@marmonrail.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

New Contact

Organization Name

UTLX

Prefix

MR

First

brandon

Middle

Last

howard

Suffix

Credentials

Title

Environmental Manager

Enter new address or copy one from list:

Mailing Address

Address Type

Domestic

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

16923 BEAUMONT HWY

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

City

HOUSTON

State

TX

ZIP

77049

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

9047080372

Extension

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

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

E-mail

brandon.howard@marmonrail.com

Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

29 Deg 52 Min 3 Sec

3) Permit Longitude Coordinate:

95 Deg 8 Min 35 Sec

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

New Application

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

Streamlined Revision

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

No

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

No

5) Who will electronically sign this Title V application?

Duly Authorized Representative

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

No

requirements?

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

[File Properties]

File Name

OP-1 - 10002 - Sheldon - update.pdf

Hash

80EF21D1A600A98E38BEBB0BE601C8F36B01174D81CFC1F1724C89B5227DF7A6

MIME-Type

application/pdf

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

[File Properties]

File Name

OP-2 - 10059 - Sheldon.pdf

Hash

5763A2330D6197F999C8D13AEBC0B2C256B69ADF4867E0384C798CC524A36A56

MIME-Type

application/pdf

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

[File Properties]

File Name

OP-REQ1 - 10043tbl.pdf

Hash

FA337155A6AC0A9730501B5133C11E306E855FA0E35CB916EBD8FB015D2587DA

MIME-Type

application/pdf

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

[File Properties]

File Name

OP-REQ2 - 10017 - Sheldon.pdf

Hash

DF7DD69232F29119618C1539B1E80D727A AFF4D4AC10DF9AD9A88FB8B38B612F

MIME-Type

application/pdf

Attach OP-REQ3 (Applicable Requirements Summary)

[File Properties]

File Name

OP-REQ3 - 10018 - Sheldon.pdf

Hash

1E1B3447D7E9D2D63444E11996D5AE5F706035D73604FD764E0467E3E1E56AEB

MIME-Type

application/pdf

Attach OP-PBR SUP (Permits by Rule Supplemental Table)

[File Properties]

File Name

OP-PBR SUP - 20875 - Sheldon.pdf

Hash

3AA27220D7F14FB1AEF035E03716A896DEA97C0D4BD9710B5D612122AC1D3910

MIME-Type

application/pdf

Attach OP-SUMR (Individual Unit Summary for Revisions)

[File Properties]

File Name OP-SUMR - 10344 - Sheldon (2).pdf

Hash D39B979C58D13438AD1377E17834324E5459BC737DAA882DEC8B59035A78AC87

MIME-Type application/pdf

Attach OP-MON (Monitoring Requirements)

[File Properties]

File Name OP-MON - 10421 - Sheldon.pdf

Hash 5392D13C059C90F5BB9BB8B98FD387F9D26268AE7418337EA3A91FE78914EC84

MIME-Type application/pdf

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)

[File Properties]

File Name OP_DEL_DEL update page 6.pdf

Hash FFD61DC0D19886FFECFA6D423F60D47FD0F2BA5751B9B34057A28C3C194D9F5D

MIME-Type application/pdf

[File Properties]

File Name OP_DEL_DEL update page 7.pdf

Hash 72A040CDA097431B1F90F6906456225D9E2921BE9D3B1499EDD31AE5AE615F5A

MIME-Type application/pdf

Attach any other necessary information needed to complete the permit.

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

Expedite Title V

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

Certification

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

1. I am Brandon Howard, the owner of the STEERS account ER036320.
2. I have the authority to sign this data on behalf of the applicant named above.

3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
8. I am knowingly and intentionally signing Title V Existing 1729.
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: Brandon Howard OWNER OPERATOR

Account Number:	ER036320
Signature IP Address:	73.166.30.69
Signature Date:	2025-10-10
Signature Hash:	E12B0422D7A832514A0AE7360203A23216D9A72D035DFD2EF9F2D6A9C5841D5C
Form Hash Code at time of Signature:	596E13744B16DD26D262B3C01886863F1DFC4F6F4C7A16D552A7B8DA40B3CF29

Submission

Reference Number:	The application reference number is 825215
Submitted by:	The application was submitted by ER036320/Brandon Howard
Submitted Timestamp:	The application was submitted on 2025-10-10 at 14:02:14 CDT
Submitted From:	The application was submitted from IP address 73.166.30.69
Confirmation Number:	The confirmation number is 684523
Steers Version:	The STEERS version is 6.93
Permit Number:	The permit number is 1729

Additional Information

Application Creator: This account was created by Brandon Howard

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

Owners or operators of a site required to obtain a federal operating permit (FOP), in accordance with Title 30 Texas Administrative Code Chapter 122 (30 TAC Chapter 122), must complete and submit an FOP application to the Texas Commission on Environmental Quality (TCEQ), Office of Air, Air Permits Division (APD), and a copy must be submitted to the appropriate TCEQ regional office, and the United States Environmental Protection Agency (EPA) – Region 6 Office. There are three types of FOPs, and they are as follows: site operating permit (SOP), temporary operating permit (TOP), and general operating permit (GOP). Information on these permit types can be found on the TCEQ website at www.tceq.texas.gov/permitting/air/titlev/permit_types.html.

For submissions to EPA:

EPA Region 6 office has requested that all applications, including any updates, submitted to EPA be provided in electronic format via email to R6AirPermitsTX@epa.gov. Microsoft Word for text, Excel for spreadsheets, and a searchable Adobe Acrobat (pdf) file are the preferred formats. Do not submit any compressed or zip files, or files with an “exe” extension. Do not submit any individual files larger than 10 megabytes via email, and the total size of all attachments cannot exceed 25 megabytes per email. EPA will accept larger files via FTP transfer. Send an email to wilson.aimee@epa.gov to request an FTP link for submittals. Submit confidential information as a separate file and clearly label it with “confidential” or “CBI” in the filename. Identify the associated permit number when submitting information. No hard copies of the information contained in the application should be submitted to EPA.

Please contact Ms. Aimee Wilson (wilson.aimee@epa.gov) at (214) 665-7596 if you have any questions pertaining to electronic submittals.

General:

The purpose of this form is to provide general information regarding the company, site, and area for which an FOP application is being submitted. **This form is required for all initial and renewal FOP applications.** This form is only required for FOP revision applications if the information on this form has changed. FOP revision and renewal applications must include Form OP-2 (Application for Permit Revision/Renewal), at a minimum.

Note: For a change of company name or ownership only, submit TCEQ Form Number 20405. Form OP-1 is not required.

For initial FOP issuance only, an abbreviated application (at a minimum) must be submitted in accordance with 30 TAC § 122.130. An abbreviated application consists of Form OP-1 (Site Information Summary), Form OP-CRO1 (Certification by Responsible Official), and a TCEQ Core Data Form. In accordance with 30 TAC § 122.130, the executive director will inform the applicant in writing of the deadline for submitting the remaining application information (full application).

Information regarding SOP application requirements can be found on TCEQ's Air Site Operating Permit Guidance webpage located at www.tceq.texas.gov/permitting/air/guidance/titlev/tv_site_guidance.html. Information regarding GOP application requirements can be found on TCEQ's Air General Operating Permit Guidance webpage located at www.tceq.texas.gov/permitting/air/guidance/titlev/tv_gop_guidance.html.

Submitting a timely and complete application, as defined in 30 TAC §§ 122.133 and 122.134, is critical and allows the applicant to receive the benefit of an application shield, as defined in 30 TAC § 122.138. The application shield serves as authorization to operate the site until final action is taken on the application. **Failure to supply any information requested by the TCEQ, pursuant to the application review, may result in the loss of the application shield.**

The responses to most data elements in Form OP-1 are limited in some way. **Responses not made according to the instructions may result in delays in this or other permitting actions.**

- 1) Some responses have a character limit. (Example: “Company Name,” maximum 50 characters.) The responses may consist of characters, digits, or a combination of the two. When appropriate, common abbreviations can be used to fit a response into the space allotted.

- 2) Some responses are limited to “YES” or “NO” and in some cases “N/A” for “not applicable.” Applicants must select one of these options. “N/A” is an acceptable response only when it is stated in the instructions for the question.
- 3) Some responses must be in a specific format. (Examples: Dates, MM/DD/YYYY; Latitude/Longitude, DDD:MM:SS.)
- 4) Some responses are limited to a set of mutually exclusive response options, and selections are recorded by placing an “X” in the box next to the appropriate response. (Example: “Permit Type.”)

The TCEQ requires that a Core Data Form be submitted with all incoming permit applications unless a Regulated Entity and Customer Reference Number have been issued by the TCEQ and no core data information has changed. For more information regarding the Core Data Form, call (512) 239-5175 or go to the TCEQ website at: www.tceq.texas.gov/permitting/central_registry/guidance.html.

Page 1:

Specific:

I. Company Identifying Information

- A. **Company Name:**
Enter the name of the company for which the application is being submitted (maximum 50 characters). The company name should be the name used to incorporate, for which a franchise tax identification number has been issued. If a franchise tax identification number has not been issued, then enter the most identifying name for the company. The company name on this form and the TCEQ Core Data Form should match.
- B. **Customer Reference Number (CN):**
Enter the customer reference number (CNXXXXXXXXXX). This number is issued by the TCEQ as part of the central registry process. If a customer reference number has not yet been issued, leave this space blank. Do not enter permit numbers, project numbers, account numbers, etc., in this space.
- C. **Submittal Date:**
Enter the date the application is being submitted by the applicant to the TCEQ (MM/DD/YYYY).

II. Site Information

- A. **Site Name:**
Enter the name of the site for which the application is being submitted (maximum 50 characters). The Site Name on this form and the Regulated Entity Name listed in Section III of the TCEQ Core Data Form should match.
- B. **Regulated Entity Reference Number (RN):**
Enter the regulated entity reference number for the site (RNXXXXXXXXXX). This number is issued by the TCEQ as part of the central registry process. If a regulated entity reference number has not yet been issued, leave this space blank. Do not enter permit numbers, project numbers, account numbers, etc., in this space.
- C. **Indicate Affected State(s) Required to Review Permit Application:**
As stated in 30 TAC § 122.330(b), an affected state may be Arkansas (AR), Colorado (CO), Kansas (KS), Louisiana (LA), New Mexico (NM), or Oklahoma (OK), if the state’s air quality may be affected by the issuance or denial of a federal operating permit, revision, or renewal; or that state is within **50 miles** of the site.

Place an “X” in the space to the left of the affected state(s) that is applicable. Place an “X” to the left of “N/A” if the affected state review is not applicable.

GOP applications do not require affected state review. Therefore, all GOP applicants should place an “X” to the left of “N/A.”

- D. **Indicate all pollutants for which the site is a major source based on the site’s potential to emit:**
Place an “X” in the box to the left of the pollutant for all the pollutants for which the site is classified as a major source, as defined in 30 TAC § 122.10, based on the site’s potential to emit. Otherwise, leave the box blank.

The row “Other” is provided for the listing of non-criteria regulated air pollutants for which a site is a major source. (Example: chlorinated compounds, inorganic acids) List the pollutant name in the space provided (maximum 20 characters). If there are none, leave this space blank.

Further information regarding the potential to emit can be found in the Potential to Emit Guidance, which is located on the TCEQ website at

www.tceq.texas.gov/permitting/air/guidance/titlev/tv_fop_guidance.html.

- E. **Is the Site a Non-Major Source Subject to the Federal Operating Permit Program?**
Place an “X” in the box for “YES” if the site is a non-major source (or area source) subject to the Federal Operating Permit Program. Otherwise, place an “X” in the box for “NO.” (Note that if the response to this question is “YES,” then the responses to question II.D above should all be “NO.”)

- F. **Is the Site Within a Local Program Area Jurisdiction?**
Place an “X” in the box for “YES” if the site is located within the jurisdiction of a local air pollution control program. Otherwise, place an “X” in the box for “NO.”

A list of local air pollution control programs is located on the TCEQ website at

www.tceq.texas.gov/permitting/air/local_programs.html.

- G. **Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63?**
Place an “X” in the box for “YES” if emissions averaging will be used by an affected source at the site to comply with any Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63) requirement, relating to National Emission Standards for Hazardous Air Pollutants for Source Categories that has been promulgated at the time of application submittal. Otherwise, place an “X” in the box for “NO.”

Emissions averaging, as defined in 40 CFR § 63.2, is a way to comply with the emission limitations specified in a relevant standard, whereby an affected source, if allowed under a subpart of this part, may create emission credits by reducing emissions from specific points to a level below that required by the relevant standard, and those credits are used to offset emissions from points that are not controlled to the level required by the relevant standard.

- H. **Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:** If emissions averaging will be used by an affected source at the site to comply with any 40 CFR Part 63 Subpart, enter the subpart(s) designation (*Example: N, P, CC, KK*) in the space provided. If emissions averaging will not be used, leave this space blank.

III. Permit Type:

- A. **Type of Permit Requested:**
Indicate the type of permit for which this application is being submitted by placing an “X” in the space to the left of the selection (SOP, TOP, or GOP). Select only one response.

Information on the different permit types can be found on the TCEQ website at

www.tceq.texas.gov/permitting/air/titlev/permit_types.html.

Page 2:

IV. Initial Application Information *(Complete for Initial Issuance Applications only.)*

A. **Is this submittal an Abbreviated or Full Application?**

Indicate the type of application (“Abbreviated” or “Full”) by placing an “X” in the space to the left of the selection.

Abbreviated applications must be submitted in accordance with 30 TAC § 122.130. An abbreviated application only includes Form OP-1, Form OP-CRO1 (Certification by Responsible Official), and the TCEQ Core Data Form. If the submitted application is not an abbreviated application, select “Full.”

B. **If this is a Full Application, is this submittal a follow-up to an Abbreviated Application?**

Place an “X” in the box for “YES” if this submittal is a full application, which is being submitted in response to a request for follow-up information regarding an abbreviated application that was submitted earlier. If this submittal is a full application (Application Type = “Full”) *and no abbreviated application was submitted earlier*, place an “X” in the box for “NO.” If this submittal is an abbreviated application (Application Type = “Abbreviated”), leave this space blank.

C. **If this is an Abbreviated Application, is this an early submittal for a combined SOP and Acid Rain permit?**

Place an “X” in the box for “YES” if this submittal is an early submittal for a combined SOP and Acid Rain permit. Place an “X” in the box for “NO” if this submittal is not an early submittal for a combined SOP and Acid Rain permit. If this submittal is a full application (Application Type = “Full”), leave this space blank.

D. **Has an electronic copy of this application been submitted (or is being submitted) to EPA at R6AirPermitsTX@epa.gov?**

Place an “X” in the box for “YES” if an electronic copy of this application has been submitted (or is being submitted) to EPA. If not, place an “X” “NO.” (See “For submissions to EPA” above for additional information.)

V. Confidential Information

A. **Is confidential information submitted in conjunction with this application?**

Place an “X” in the box for “YES” if any confidential information is being submitted in conjunction with this application. Otherwise, place an “X” in the box for “NO.” All confidential information must be submitted according to the TCEQ guidance located at www.tceq.texas.gov/permitting/air/titlev/apps_timelines.html#confidential.

VI. Responsible Official (RO) Identifying Information

The RO must be listed in this section even if the duties will be delegated to a Duly Authorized Representative (DAR). The DAR information should be provided on the Form OP-DEL (Delegation of Responsible Official). Additional information on Responsible Official and Certification can be found on the TCEQ website at www.tceq.texas.gov/permitting/air/titlev/ro_and_certs.html.

Note: For a change of RO and RO information, Form OP-CRO2 (Change of Responsible Official) must be submitted to the TCEQ.

Place an “X” next to the appropriate conventional title (Mr./Mrs./Ms./Dr.). Enter the name and title of the RO pursuant to 30 TAC § 122.132(e) and 30 TAC § 122.165 (Last Name, First Name, MI; maximum 25 characters).

Enter the name of the company, firm, etc. that employs the RO (maximum 50 characters). The company or firm name should be the name used to incorporate, for which a franchise tax identification number has been issued. If a franchise tax identification number has not been issued, then enter the most identifying name for the company or firm. Enter the mailing address, including city, state, ZIP Code. If the mailing address is not within the United States, enter the territory, country, and foreign postal code, rather than the state and ZIP Code. Enter an internal mail code, telephone number, fax number, and email address of the RO listed.

Page 3:

VII. Technical Contact Identifying Information *(Complete if different from RO information.)*

Place an "X" next to the appropriate conventional title (Mr./Mrs./Ms./Dr.). Enter the name and title of the technical contact for this application, if different from the RO (Last Name, First Name, MI; maximum 25 characters). Enter the name of the company, firm, etc. that employs the technical contact (maximum 50 characters). The company or firm name should be the name used to incorporate, for which a franchise tax identification number has been issued. If a franchise tax identification number has not been issued, then enter the most identifying name for the company or firm. Enter the mailing address, including city, state, ZIP Code. If the mailing address is not within the United States, enter the territory, country, and foreign postal code, rather than the state and ZIP Code. Enter an internal mail code, telephone number, fax number, and email address of the technical contact listed.

VIII. Reference Only Requirements *(For reference only.)*

Certification by the RO pursuant to 30 TAC § 122.165 does not extend to information which is designated on forms as "For reference only."

A. State Senator:

Enter the name of the state senator representing the area in which the site is located (maximum 25 characters).

TCEQ will send notification of the receipt of a permit application to the state senator for the area in which the site is located. State senator information may be obtained by contacting the State Senate at (512) 463-0100 or the Legislative Reference Library at (512) 463-1252. Information may also be obtained via the Texas Senate Internet site at www.legis.state.tx.us/.

B. State Representative:

Enter the name of the state representative representing the area in which the site is located (maximum 25 characters).

TCEQ will send notification of the receipt of a permit application to the state representative for the area in which the site is located. State representative information may be obtained by contacting the House of Representatives at (512) 463-4630 or the Legislative Reference Library at (512) 463-1252. Information may also be obtained via the House of Representatives Internet site at www.legis.state.tx.us/.

C. Has the applicant paid emissions fees for the most recent agency fiscal year?

Place an "X" in the box for "YES" if the applicant has paid all emissions fees, or inspection fees, if applicable, due during the most recent agency fiscal year (September 1 - August 31). Otherwise, place an "X" in the box for "NO." If the applicant is not required to pay emissions fees, place an "X" in the box for "N/A."

If the answer to VIII.C. is "NO" or "NA," the applicant is required to contact the Industrial Emissions Assessment Section at (512) 239-1459. For further information regarding inspection fees and emission fees, please refer to 30 TAC §§ 101.24 and 101.27.

D. Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322?

Place an "X" in the box for "YES" if the site is subject to the bilingual notice requirements pursuant to 30 TAC § 122.322. Otherwise, place an "X" in the box for "NO."

The requirements of 30 TAC § 122.322 are applicable when either the elementary school or the middle school located nearest to the facility, or proposed facility, provides a bilingual education program, as required by Texas Education Code § 29.053 and 19 TAC § 89.1205(a) (relating to Required Bilingual Education and English as a Second Language Programs), or if either school has waived out of such a required bilingual education program under the provisions of 19 TAC § 89.1205(g). Schools not governed by the provisions of 19 TAC § 89.1205 should not be considered when determining the applicability of 30 TAC § 122.322 requirements.

Elementary or middle schools that offer English as a second language under 19 TAC § 89.1205(d) and are otherwise not affected by 19 TAC § 89.1205(a), will not trigger the requirements of 30 TAC § 122.322(a).

E. Indicate the alternate language(s) in which public notice is required:

If the answer to the previous question is "YES," enter the alternate language(s) for which public notice is required in the space provided.

Please use a separate page to indicate the alternate languages if additional space is required. If the answer to the previous question is "NO," enter "NONE."

Examples:

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, Vietnamese, German

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:	None

[Page 4:](#)

IX. Off-Site Permit Request (Optional)

Complete this section only if the applicant wishes to maintain the FOP and records at a location other than the site designated in the "Site Information" section of this form.

A. Office/Facility Name:

Enter the name of the office or facility where the FOP and records are to be held (maximum 50 characters).

B. Physical Address: Enter the physical address of the office or facility, including city, state, and ZIP Code (physical address - maximum 50 characters and city - maximum 25 characters). If the mailing address is not within the United States, enter the territory, country, and foreign postal code, rather than the state and ZIP Code. The physical address cannot be a Post Office Box.**C. Physical Location:**

If a physical address does not exist, provide a description of the physical location of the office or facility where the permit is to be held (maximum 250 characters). (*Example: Highway 100, 2 miles west of County Road 12.*) Leave Physical Location blank if there is a Physical Address.

- D. **Contact Name:**
Place an "X" next to the appropriate conventional title (Mr./Mrs./Ms./Dr.). Enter the name of a contact person at the office or facility where the FOP and records are to be held (maximum 50 characters).
- E. **Telephone:**
Enter the contact person's telephone number with the area code.

X. Application Area Information

This section pertains to the application area. If only one application is being submitted (or was submitted) for the entire site, then the following information relates to the site as a whole.

- A. **Area Name:**
Enter the name of the application area (maximum 50 characters). If more than one permit is proposed for the site, the area name should be descriptive enough to provide a clear distinction of the portion of the site covered under this application. (*Examples: "Tank Battery #1," "North Loading Area".*) If there is only one permit proposed for the site, the area name must be the same as the site name in the "Site Information" section of this form. Note that the area may refer to a subset of units at the site to be covered by an application; it need not refer to a distinct physical area. This name will eventually be used as the name for the permit.
- B. **Physical Address:**
Enter the physical address of the application area, including city, state, and ZIP Code (physical address - maximum 50 characters and city - maximum 25 characters).

If there is a Physical Address, **skip** X.C-F below.
- C. **Physical Location:**
If a physical address does not exist, provide a description of the physical location of the application area (maximum 250 characters). (*Example: Highway 100, 2 miles west of County Road 12.*)
- D. **Nearest City:**
Enter the name of the city or municipality nearest to the application area, or in which the application area is located (maximum 25 characters).
- E. **State:**
Enter the state in which the nearest city is located.
- F. **ZIP Code:**
Enter the ZIP Code of the application area. (*This is used for location purposes and must be provided even if the facility does not receive mail delivery.*)

Page 5

- G. **Latitude:**
Enter the latitude coordinate for the application area (*DDD:MM:SS*). Latitude indicates the angular distance (in degrees) of a location north of the equator and will always be between 25 and 37 degrees in Texas. Coordinates of the area must be shown to the nearest second and can be obtained from most city engineers, U.S. Geological Survey (USGS) maps, or from county maps prepared by the Texas Department of Transportation (TxDOT).
- H. **Longitude:**
Enter the longitude coordinate for the application area (*DDD:MM:SS*). Longitude indicates the angular distance (in degrees) of a location west of the prime meridian and will always be between 93 and 107 degrees in Texas. Coordinates of the area must be shown to the nearest second and can be obtained from most city engineers, USGS maps, or county maps prepared by the TxDOT.

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?

Place an "X" in the box for "YES" if there are one or more emission units in the application area that are out of compliance. "Out of compliance" means a situation in which an emission unit or an operating condition *may* not be in compliance with one or more applicable requirements. Information on these units will be forwarded to the appropriate regional office. Title 30 TAC Chapter 122 requires that a description of the compliance status for all emission units be provided in a full application. Additional compliance information for full applications is provided on Form OP-ACPS (Application Compliance Plan and Schedule). If all emission units in the application area are believed to be in compliance, place an "X" in the box for "NO."

J. Estimated number of emission units in the application area:

Enter an estimated number of emission units in the application area with potentially applicable requirements. Do not include emission units that will only be addressed on Form OP-REQ1 (Application Area-wide Applicability Determinations and General Information).

K. Are there any emission units in the application area subject to the Acid Rain Program?

Place an "X" in the box for "YES" if any emission units in the application area are subject to the Acid Rain Program (ARP), including the Opt-in Program. Otherwise, place an "X" in the box for "NO."

If the response to this question is "YES," submit the appropriate forms for an acid rain permit, if not already submitted. Applications for acid rain permits for opt-in sources to the ARP shall be submitted in accordance with 40 CFR Part 74.

The Opt-in Program allows stationary combustion sources not required to participate in the ARP the opportunity to enter the program on a voluntary basis, reduce their sulfur dioxide (SO₂) emissions, and receive their own acid rain allowances. Combustion sources are defined as fossil fuel-fired boilers, turbines, or internal combustion engines. An opt-in source must comply with the same or similar provisions as utility units affected under the mandatory ARP. These provisions relate to allowance trading, permitting, excess emissions, monitoring, end-of-year compliance, and enforcement. Most basic to the program is the requirement that each year the opt-in source must hold enough allowances to cover its annual SO₂ emissions. For additional information, please refer to 40 CFR Part 74.

XI. Public Notice

Complete this section for SOP Applications (initial, renewal, and significant revision) and Acid Rain Permit Applications only.

A. Name of a public place to view application and draft permit:

Enter the name of the public place where the application and draft permit will be available for review and copying by the public throughout the public notice period.

The public place must be publicly owned or operated, such as a library, courthouse, or city hall, and must be located in the same county as the site. The TCEQ Regional Office may be used as a public place if it is located in the same county as the site.

B. Physical Address:

Enter the public place physical address, including city and ZIP Code (physical address - maximum 50 characters and city - maximum 25 characters).

C. Contact Person:

Place an "X" next to the appropriate conventional title (Mr./Mrs./Ms./Dr.). Enter the name of the contact person who will answer questions from the public during the Public Notice Period (Last Name, First Name, MI; maximum 25 characters). This information will be published in the newspaper notice.

Enter the mailing address, including city, state, ZIP Code (address - maximum 50 characters; city - maximum 25 characters). If the mailing address is not within the United States, enter the territory, country, and foreign postal code, rather than the state and ZIP Code. Enter the internal mail code that is part of the mailing address of the contact person, if applicable (maximum 10 characters). Enter the contact person's telephone number with the area code. This information will be published in the newspaper notice.

Page 6:

XII. Delinquent Fees and Penalties

Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the "Delinquent Fee and Penalty Protocol." For more information regarding Delinquent Fees and Penalties, go to the TCEQ website at www.tceq.texas.gov/agency/fees/delin/index.html.

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

XIII. Designated Representative (DR) Identifying Information

Place an "X" next to the appropriate conventional title (Mr./Mrs./Ms./Dr.). Enter the name and title of the DR pursuant to 30 TAC § 122.165 (Last Name, First Name, MI; maximum 25 characters). Enter the name of the company, firm, etc. that employs the DR (maximum 50 characters). The company or firm name should be the name used to incorporate, for which a franchise tax identification number has been issued. If a franchise tax identification number has not been issued, then enter the most identifying name for the company or firm. Enter the mailing address, including city, state, ZIP Code. If the mailing address is not within the United States, enter the territory, country, and foreign postal code, rather than the state and ZIP Code. Enter an internal mail code, telephone number, fax number, and email address of the DR listed.

Page 7:

XIV. Alternate Designated Representative (ADR) Identifying Information

If there is no ADR, leave this section blank.

Place an "X" next to the appropriate conventional title (Mr./Mrs./Ms./Dr.). Enter the name and title of the ADR pursuant to 30 TAC § 122.165 (Last Name, First Name, MI; maximum 25 characters). Enter the name of the company, firm, etc. that employs the ADR (maximum 50 characters). The company or firm name should be the name used to incorporate, for which a franchise tax identification number has been issued. If a franchise tax identification number has not been issued, then enter the most identifying name for the company or firm. Enter the mailing address, including city, state, ZIP Code. If the mailing address is not within the United States, enter the territory, country, and foreign postal code, rather than the state and ZIP Code. Enter an internal mail code, telephone number, fax number, and email address of the ADR listed.

**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: Union Tank Car Company
B. Customer Reference Number (CN): CN 600126395
C. Submittal Date (mm/dd/yyyy): 08/20/2025
II. Site Information
A. Site Name: Transco Railway Products
B. Regulated Entity Reference Number (RN): RN RN100212828
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: NA
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
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: Tyler Moore
RO Title: Director of Operations
Employer Name: Transco Railway Products, Inc.
Mailing Address: 16923 Old Beaumont Highway 90
City: Houston
State: TX
ZIP Code: 77049
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (336) 470-8640
Fax No.: 281-591-3001
Email: tyler.moore@transcorailway.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: Brandon Howard
Technical Contact Title:
Employer Name: Union Tank Car Company
Mailing Address: 16923 Beaumont Hwy
City: Houston
State: TX
ZIP Code: 77049
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (904) 708-0372
Fax No.:
Email: brandon.howard@marmonrail.com
VIII. Reference Only Requirements <i>(For reference only.)</i>
A. State Senator: Carol Alvarado, District 6
B. State Representative: Harold V. Dutton Jr., District 142
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: Transco Railway Product, Inc
B. Physical Address: 16923 Old Beaumont Highway 90
City: Sheldon
State: TX
ZIP Code: 77049
C. Physical Location:
North-East of Highway 8 and Beaumont Hwy
D. Nearest City: Houston
E. State: TX
F. ZIP Code: 77049

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

X. Application Area Information (<i>continued</i>)
G. Latitude (nearest second): 29° 51' 57"
H. Longitude (nearest second): 95° 08' 14"
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: 14
K. Are there any emission units in the application area subject to the Acid Rain Program? ☐ YES ☒ NO
XI. Public Notice (<i>Complete this section for SOP Applications and Acid Rain Permit Applications only.</i>)
A. Name of a public place to view application and draft permit: Sheldon Municipal Utility District Administrative Office
B. Physical Address: 9419 Lamkin Road
City: Houston
ZIP Code: 77049
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: Brandon Howard
Contact Mailing Address: 16923 Beaumont Highway
City: Houston
State: TX
ZIP Code: 77049
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.:

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 6)
Texas Commission on Environmental Quality**

XII. Delinquent Fees and Penalties
Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of Attorney General on behalf of the TCEQ are paid in accordance with the "Delinquent Fee and Penalty Protocol."
Complete Sections XIII and XIV for Acid Rain Permit and CSAPR applications only. Please include a copy of the Certificate of Representation submitted to EPA.
XIII. Designated Representative (DR) Identifying Information
DR Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
DR Full Name:
DR Title:
Employer Name:
Mailing Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.:
Fax No.:
Email:

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

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

XIV. Alternate Designated Representative (ADR) Identifying Information

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

ADR Full Name:

ADR Title:

Employer Name:

Mailing Address:

City:

State:

ZIP Code:

Territory:

Country:

Foreign Postal Code:

Internal Mail Code:

Telephone No.:

Fax No.:

Email:

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

Please note that a Change of Name/Ownership should be submitted on TCEQ Form Number 20405 to ensure that all affected federal operating permits and new source review pre-construction authorizations are updated with the Air Permits Division. If there is no other change to the FOP or any underlying requirements of the FOP, then Form OP-2 is not required. Form Number 20405 is located on the TCEQ website at www.tceq.texas.gov/assets/public/permitting/air/Forms/20405.pdf.

General:

Owners or operators of a site having a federal operating permit (FOP), in accordance with Title 30 Texas Administrative Code Chapter 122 (30 TAC Chapter 122), must complete and submit an FOP revision application for those activities at a site which change, add, or remove one or more permit terms or conditions (or changes any underlying requirements in the FOP).

In addition, these owners or operators must complete and submit an application for renewal of a Site Operating Permit (SOP) or authorization to operate (ATO) under a General Operating Permit (GOP) at least 6 months, but no earlier than 18 months, before the date of expiration of the SOP or ATO under a GOP. Permit holders applying for renewal may include revisions during the application processing.

The FOP revision/renewal application must be submitted to the Texas Commission on Environmental Quality (TCEQ), Office of Air, Air Permits Division (APD), and a copy must be submitted to the appropriate TCEQ regional office. The TCEQ requires that a Core Data Form be submitted on all incoming applications unless a Regulated Entity and Customer Reference Number have been issued by the TCEQ and no core data information has changed. For more information regarding the Core Data Form, call (512) 239-5175 or visit the TCEQ website at www.tceq.texas.gov/permitting/central_registry/index.html.

Title 30 Texas Administrative Code § 122.132(c) [30 TAC § 122.132(c)] (relating to “Application and Required Information for Initial Permit Issuance, Reopening, Renewal, or General Operating Permits”) and 30 TAC § 122.134(c) (relating to “Complete Application”) authorize an applicant to submit an abbreviated initial application. Abbreviated revision and renewal applications are not authorized under 30 TAC Chapter 122 and will not be accepted as complete and/or timely applications.

For submissions to EPA:

EPA Region 6 office has requested that all applications, including any updates, submitted to EPA be provided in electronic format via email to R6AirPermitsTX@epa.gov. Microsoft Word for text, Excel for spreadsheets, and a searchable Adobe Acrobat (pdf) file are the preferred formats. Do not submit any compressed or zip files, or files with a “.exe” extension. Do not submit any individual files larger than 10 megabytes via email, and the total size of all attachments cannot exceed 25 megabytes per email. EPA will accept larger files via FTP transfer. Send an email to wilson.aimee@epa.gov to request an FTP link for submittals. Submit confidential information as a separate file and clearly label it with “confidential” or “CBI” in the filename. Identify the associated permit number when submitting information. No hard copies of the information contained in the application should be submitted to EPA.

Please contact Ms. Aimee Wilson (wilson.aimee@epa.gov) at (214) 665-7596 if you have any questions pertaining to electronic submittals.

Permit Revision Types:

The three permit revision types for an SOP are as follows: administrative revision, minor revision, and significant revision. The type of permit revision that is required will depend on the type of change at the site or to the SOP. Additional information on SOP revisions and application requirements can be found in the SOP Revision Application Guidance, which is located on the TCEQ website at www.tceq.texas.gov/permitting/air/guidance/titlev/tv_site_guidance.html.

For administrative revisions, 30 TAC § 122.213(a)(1) requires the permit holder to record and maintain the information required in 30 TAC § 122.212 with the permit before the change is operated.

For minor revisions due to changes at a site, 30 TAC § 122.217(a)(2) requires the permit holder to submit an application containing the information required in 30 TAC § 122.216 before the change is operated. This information must also be maintained with the permit.

For significant revisions, 30 TAC § 122.221(a)(2) requires the permit holder to submit the information in 30 TAC § 122.220 and obtain a revised permit before the change is operated.

For revisions to an ATO under a GOP due to changes at a site, 30 TAC § 122.503(c)(2) requires the permit holder to submit an application that contains information required in 30 TAC § 122.503(b) before the change is operated. This information must also be maintained with the permit. When a GOP is revised or repealed, the applicant must record and maintain the information required in 30 TAC §§ 122.504(a)(1)(A)-(E) before the compliance date of the new requirement or the effective date of the repealed requirement. This application must be submitted no later than 90 days after the compliance date of the new requirement or the effective date of the repealed requirement.

Further information regarding GOP application requirements can be found in the GOP Revision Application Guidance, which is located on the TCEQ website at www.tceq.texas.gov/permitting/air/guidance/titlev/tv_gop_guidance.html.

Form Page Header:

Enter the following information in the header of each page: Date (MM/DD/YYYY) of application submission, Permit Number, Regulated Entity Number, and Company Name.

Table 1

Specific:

I. Application Type:

Indicate the type of application by checking the appropriate box. Please choose only one.

Renewal:

The application is for a renewal of an SOP or ATO under a GOP. The permit holder may include any revisions on this form to be processed under the renewal application. For renewals, the application type will be handled as a renewal regardless of the type of revisions that are included. If a Streamlined Revision (as explained below) is included in the renewal, all applicable provisional terms, and conditions must be included in the application. If a Significant Revision is included with the renewal, the information in Table 3, Section I of this form must be completed.

Significant Revision:

The application contains significant permit revisions as defined in 30 TAC § 122.219. Applicants must revise the permit before operating.

Administrative Revision:

The application contains administrative permit revisions as defined in 30 TAC § 122.211.

Streamlined Revision:

The application contains either **minor permit revisions** as defined in 30 TAC § 122.215 or **revisions to an ATO under a GOP** as defined in 30 TAC § 122.503 or § 122.504, and in which the applicant intends to begin operation prior to updating the permit.

For Streamlined Revision applications, the permit holder must establish and submit provisional terms and conditions as defined in 30 TAC § 122.10. The provisional terms and conditions must include complete identification of all applicable requirements resulting from the change(s) at the site, or any other action, that trigger the requirement for a permit revision (i.e. require the permit holder to apply for a revision of the SOP or revision of the ATO under a GOP). Provisional terms and conditions must also include, where applicable, specific

regulatory citations identifying any requirements that no longer apply. Provisional terms and conditions cannot be established and submitted for any change(s) that trigger a significant revision of the SOP.

When an applicant identifies and submits provisional terms and conditions as part of a permit revision application, or an FOP renewal application that includes revisions to the applicable requirements, these terms and conditions become applicable requirements for the permit area/site. This means that provisional terms and conditions established in this manner are considered as applicable requirements for the permit area/site, after the permit revision or permit renewal application is submitted by the permit holder. The permit holder shall comply with these provisional terms and conditions and meet the requirements of 30 TAC Chapter 122, including deviation and compliance reporting, after the permit revision or permit renewal application is submitted. Note that the choice to establish provisional terms and conditions applies to all requested changes within a Streamlined Revision application.

SOP holders must establish provisional terms and conditions (detailed regulatory citations) and submit this information on Table 2 (of this form) or Form OP-REQ3.

GOP holders must establish provisional terms and conditions (detailed regulatory citations) and submit this information on Table 2 (of this form) or Form OP-REQ3. As an alternative, if the provisional terms and conditions are specified in an applicable GOP Index Number, the appropriate Unit Attribute form may be completed and submitted.

If the applicant does not elect to establish provisional terms and conditions in their application, then the change cannot be operated until the FOP is revised or renewed to codify the applicable requirements into the FOP.

Revision Requesting Prior Approval:

The application contains either minor permit revisions as defined in 30 TAC § 122.215 or revisions to an ATO under a GOP as defined in 30 TAC § 122.503 and in which the applicant elects to update the permit prior to operating the change.

Response to Reopening:

The application contains changes needed to the permit as a result of a reopening notice by the TCEQ. (These changes will be processed under the reopening procedures outlined in 30 TAC Chapter 122, Subchapter C, Division 3.)

II. Qualification Statement

Note: These questions refer to the permit being revised.

For SOP Revisions Only:

Check the “YES” box if the referenced changes qualify for the marked revision type. Otherwise, check the “NO” box.

For GOP Revisions Only:

Check the “YES” box if the referenced changes do not affect the site’s authorization to operate under a GOP. Otherwise, check the “NO” box.

III. Major Source Pollutants:

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

Indicate all pollutants for which the site is a major source based on the site’s potential to emit after the change is operated:

Enter “YES” below all the pollutants for which the site is classified as a major source, as defined in 30 TAC § 122.10, based on the site’s potential to emit. Enter “NO” below all the pollutants for which the site is not a major source. Do not leave any spaces blank.

The column “Other” is provided for a listing of non-criteria regulated air pollutants for which a site is a major source. (Example: chlorinated compounds, inorganic acids). List the pollutant name in the space provided (maximum 20 characters). If there are none, leave this space blank.

Further information regarding the potential to emit can be found in the Potential to Emit Guidance, which is located on the TCEQ website at tceq.texas.gov/permitting/air/guidance/titlev/tv_fop_guidance.html.

IV. Reference Only Requirements: *(For reference only.)*

Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)?

Check the “YES” box if the applicant has paid all emissions fees due during the most recent agency fiscal year (September 1 through August 31). Otherwise, check the “NO” box. If the applicant is not required to pay emissions fees, check the “N/A” box.

Note: If the answer to IV Fee Information is “NO,” the applicant is required to contact the Industrial Emissions Assessment Section at (512) 239-1459. For further information regarding inspection fees and emission fees, please refer to 30 TAC § 101.24 and § 101.27.

V. Delinquent Fees and Penalties

Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ is paid in accordance with the “Delinquent Fee and Penalty Protocol.” For more information regarding Delinquent Fees and Penalties, go to the TCEQ website at www.tceq.texas.gov/agency/financial/fees/delin.

Table 2

I. Description of Revision

Revision Number:

The revision number uniquely identifies each revision item within the application and may not be reused within the same revision application. Each revision item will be identified by a revision number, which should be assigned sequentially (i.e., “1”, “2”, “3”). The same revision number will be used on Forms OP REQ2 (Negative Applicable Requirement Determinations) and OP-REQ3 (Applicable Requirements Summary) to identify related changes resulting from the corresponding revision item. Enter a unique number for each revision.

Revision Code:

The revision code determines how each revision will be processed by the APD. Select one of the following options for revision code. Enter the code on the form. For **renewal applications**, select all codes that apply.

Significant Revision (SOPs only):

Code	Description
SIG-A	A significant change to existing monitoring, recordkeeping, reporting, or testing terms or conditions.
SIG-B	Change requiring a case-by-case determination of an emission limit or other standard, or source specific determination for temporary sources of ambient impacts, or a visibility or increment analysis.
SIG-C	Affects or adds a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.
SIG-D	Is a modification under provisions of FCAA, Title 1.
SIG-E	Any other change that does not qualify for an administrative or minor revision.

Administrative Revision (SOPs only):

Code	Description
ADMIN-A	Corrects typographical errors.
ADMIN-B	Identifies a change in the name, address, or phone number of any person identified in the permit or provides a similar administrative change at the site.

ADMIN-C	Increases the frequency of monitoring or reporting requirements without changing any existing emission limitations or standards.
ADMIN-D	Changes the permit identification of ownership or operational control of a site where the TCEQ Executive Director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the old and new permit holder is maintained with the permit. <i>For Change of Name/Ownership revision only (no other change to the SOP or any underlying requirements), submit TCEQ Form Number 20405; Form OP-2 is not required. Form Number 20405 is located on the TCEQ website at www.tceq.texas.gov/assets/public/permitting/air/Forms/20405.pdf.</i>
ADMIN-E	Affects or adds a state-only requirement.
ADMIN-F	Changes the location of an off-site permit location.
ADMIN-G	Changes that have been approved by EPA to be administrative revisions. <i>Further information may be found in the SOP Revision Application Guidance, which is located on the TCEQ website at www.tceq.texas.gov/permitting/air/guidance/titlev/tv_fop_guidance.html.</i>

Minor Revision (for SOP Streamlined Revision and Revision Requesting Prior Approval):

Code	Description
MS-A	Adds or modifies a minor New Source Review (NSR) pre-construction authorization.
MS-B	Adding or deleting a Compliance Assurance Monitoring or Periodic Monitoring option number to a unit in an SOP.
MS-C	All other changes qualify for a minor revision.

Revision to an ATO under a GOP due to changes at a site (for Streamlined Revision and Revision Requesting Prior Approval):

Code	Description
GS-A	A change, addition, or removal of any applicability determinations or the basis of any determinations in the original GOP application.
GS-B	A correction of typographical errors.
GS-C	A change in the permit identification of ownership or operational control of a site where the TCEQ Executive Director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the old and new permit holder is maintained with the permit. <i>For Change of Name/Ownership revision only (no other change to the ATO under a GOP or any underlying requirements), submit TCEQ Form Number 20405; Form OP-2 is not required. Form Number 20405 is located on the TCEQ website at www.tceq.texas.gov/assets/public/permitting/air/Forms/20405.pdf</i>

Revision to an ATO under a GOP due to changes in a rule (for Streamlined Revision and Revision Requesting Prior Approval):

Code	Description
GR-A	A revision when a GOP is revised or repealed.
GR-B	A regulation is revised.
GR-C	Adding or deleting a Compliance Assurance Monitoring or Periodic Monitoring option number to a unit in an ATO under a GOP.

Revision Due to a Reopening (SOPs only):

Code	Description
REO	A change, addition, or removal of any applicable requirement resulting from a reopening. Use this code only when revising your permit in response to a permit reopening letter from the TCEQ.

Unit/Group/Process**New Unit:**

Enter “YES” if this revision is identifying the addition of a new emission unit not previously identified on any other revision application for this permit. Otherwise, enter “NO.”

ID No.:

Enter the identification number (ID No.) of the unit, group, or process as listed on Form OP-SUM (Individual Unit Summary) or Form OP-SUMR (Individual Unit Summary for Revisions) (maximum 10 characters).

Note: Only use group identification numbers when updating existing group information contained on Unit Attribute forms or Form OP REQ3 (Applicable Requirements Summary).

Applicable Form:

Enter the number of the Unit Attribute (UA) form which contains the specific information regarding the corresponding emission unit, emission point, or process (i.e., for flares, enter OP-UA7 entitled “Flares”). A complete list of all available UA forms is located on the TCEQ website at www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html. Enter “OP ACPS,” if the unit ID No. is entered on this form, strictly as a result of completing Form OP-ACPS (Application Compliance Plan and Schedule) and no UA form is submitted (see Form OP-ACPS instructions for additional guidance). Enter the UA form number if the UA form is used in conjunction with Form OP-REQ2 for negative applicability, or if the emission unit, emission point, or process has positive applicability in addition to the negative applicability. Enter “OP-REQ2” if negative applicability is shown through the use of Form OP-REQ2, no UA information is used to support the negative applicability, and the emission unit, emission point, or process has no positive applicability.

NSR Authorization:

Identify the NSR authorizations (permit by rule (PBR) registration number, PBR number (if registration was not required), NSR permit number, standard permit registration number, etc.) for changes requiring authorization pursuant to 30 TAC Chapter 106 or Chapter 116. If an NSR authorization was not required for the change, enter N/A.

Description of Change and Provisional Terms and Conditions:

Enter a description of the change for which this application is being submitted and list the provisional terms and conditions as applicable. The provisional terms and conditions may be submitted on Form OP-REQ3 instead. For GOP applications, if the provisional terms and conditions are specified in an applicable GOP Index Number, the appropriate Unit Attribute form may be completed and submitted to reference the provisional terms and conditions.

Table 3

I. Significant Revision *(Complete this section if you are submitting a significant revision application or a **renewal application** that includes a significant revision.)*

A. Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322?

Check the “YES” box if the site is subject to the bilingual notice requirements pursuant to 30 TAC § 122.322. Otherwise, check the “NO” box.

The requirements of 30 TAC § 122.322 are applicable when either the elementary school or the middle school located nearest to the facility, or proposed facility, provides a bilingual education program, as required by Texas Education Code § 29.053, and 19 TAC § 89.1205(a) (relating to Required Bilingual Education and English as a Second Language Programs), or if either school has waived out of such a required bilingual education program under the provisions of 19 TAC § 89.1205(g). Schools not governed by the provisions of 19 TAC § 89.1205 should not be considered when determining the applicability of 30 TAC § 122.322 requirements.

Elementary or middle schools that offer English as a second language under 19 TAC § 89.1205(d) and are otherwise not affected by 19 TAC § 89.1205(a), will not trigger the requirements of 30 TAC § 122.322(a).

If the notices required by 30 TAC § 122.320 and § 122.340 are combined, the combined notice is subject to the requirements of this 30 TAC § 122.322.

B. Indicate the alternate language(s) in which public notice is required:

If the answer to the previous question is “YES,” enter the alternate language(s) for which public notice is required in the space provided. Each space should only contain one alternate language. Please use a separate page to indicate the alternate languages if additional space is required. If the answer to the previous question is “NO,” enter “NONE” in the first space provided and leave the others blank.

C. Will there be a change in air pollutant emissions as a result of the significant revision?

Public Notice requirements in 30 TAC §122.320(b)(5) require the air pollutants with emission changes to be listed in the notice. Check the “YES” box if there will be a change in air pollutant emissions as a result of the significant revision. If there will not be a change in emissions, check the “NO” box and skip question I.D below.

D. Indicate the air pollutant(s) that will be changing and include a brief description of the change in pollutant emissions for each pollutant:

Enter this information if the answer to I.C is “YES.” Spell out the air pollutant names; for example, nitrogen oxides, volatile organic compounds, lead, and benzene. This information will be used to determine the pollutant names to be included in the public notice.

Enter a descriptive phrase to reflect an addition, increase, decrease, or deletion of an air pollutant emission change as a result of the significant revision.

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

Date: 08/15/2025
Permit No.: 01729
Regulated Entity No.: RN100212828
Company Name: UTLX Manufacturing
For Submissions to EPA
Has an electronic copy of this application been submitted (or is being submitted) to EPA? ☒ YES ☐ NO
I. Application Type
Indicate the type of application:
☐ Renewal
☐ Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)
☒ Significant Revision
☐ Revision Requesting Prior Approval
☐ Administrative Revision
☐ Response to Reopening
II. Qualification Statement
For SOP Revisions Only ☒ YES ☐ NO
For GOP Revisions Only ☐ YES ☐ NO

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

III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)					
Indicate all pollutants for which the site is a major source based on the site's potential to emit: (Check the appropriate box[es].)					
☒ VOC	☐ NO _x	☐ SO ₂	☐ PM ₁₀	☐ CO	☐ Pb ☐ HAP
Other: _____					
IV. Reference Only Requirements (For reference only)					
Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)?					
☒ YES ☐ NO ☐ N/A					
V. Delinquent Fees and Penalties					
Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.					

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

Date: 08/15/2025
Permit No.: O1729
Regulated Entity No.: RN100212828
Company Name: UTLX Manufacturing

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

Revision No.	Revision Code	Unit/Group		Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
		New Unit	ID No.			
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						

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

Date: 08/15/2025
Permit No.: O1729
Regulated Entity No.: RN100212828
Company Name: UTLX Manufacturing
I. Significant Revision <i>(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)</i>
A. Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322? ☐ YES ☐ NO
B. Indicate the alternate language(s) in which public notice is required:
C. Will, there be a change in air pollutant emissions as a result of the significant revision? ☐ YES ☐ NO

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

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

Pollutant	Description of the Change in Pollutant Emissions
	NA

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

III. Certification of Truth, Accuracy, and Completeness

I, ~~Taylor Moore~~ TYLER MOORE

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

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

Responsible Official Signature: Tyler Moore

Date: 10-1-2025

Duly Authorized Representative Signature: Brandon Howard

(Name(s) printed or typed) Brandon Howard

Date: 10-1-2025

IV. Removal of Duly Authorized Representative(s)

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

(Name(s) printed or typed) _____

Effective Date: _____

Responsible Official Signature: _____

Date: _____

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

I. Identifying Information
Account Number: HG-0811-R
Regulated Entity Number: RN RN100212828
Customer Reference Number: CN 600126395
Permit Number: O1729
Area Name: Transco Railway Product
Company Name: UTLX Manufacturing
II. Duly Authorized Representative Information
Action Type: ☒ New DAR Identification ☐ Administrative Information Change
Conventional Title: ☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.
Name (Driver License/STEERS): Brandon Howard
Title: Environmental Manager
Delegation Effective Date: 9/30/20
Telephone Number: 904-708-0372
Fax Number:
Company Name: Transco Railway Products
Mailing Address: 16923 Beaumont Highway
City: Houston
State: Texas
ZIP Code: 77049
Email Address: brandon.howard@marmonrail.com

**Texas Commission on Environmental Quality
Monitoring Requirements
Form OP-MON Instructions**

General:

This form is used to allow documentation of the monitoring requirements for units, emission points, groups, and processes subject to compliance assurance monitoring (CAM) and periodic monitoring (PM). To determine if a unit, emission point, group, or process is subject to PM or CAM, review the PM and CAM applicability sections contained in Title 30 Texas Administrative Code Chapter 122 (30 TAC Chapter 122). Refer to 30 TAC Chapter 122 for application submittal requirements.

Table 1a:	CAM/PM Additions
Table 1b:	CAM/PM Control Device Additions
Table 1c:	CAM/PM Case-by-Case Additions
Table 1d:	CAM/PM Case-by-Case Control Device Additions
Table 2a:	CAM/PM Deletions
Table 2b:	CAM/PM Control Device Deletions
Table 2c:	CAM/PM Case-by-Case Deletions
Table 2d:	CAM/PM Case-by-Case Control Device Deletions

Note:

- Complete Tables 1a through 1d, as appropriate, as part of the permit **revision** process to identify any new *requirements*.
- Complete Tables 2a through 2d, as appropriate, for the permit **revision** process to **remove requirements** that no longer apply.
- Complete Tables 1a and, if necessary, 1b if submitting an option number from either a CAM or PM guidance document which identifies a new requirement.
- Complete Table 1c and, if necessary, 1d if submitting a new CAM or PM case-by-case determination.
- If the unit is a new unit at a site that already has a federal operating permit, see the Texas Commission on Environmental Quality (TCEQ) guidance document entitled "Federal Operating Permit Application Guidance Document" for additional information to aide in the completion of this form.
- When completing Tables 1a through 2d for a revision to a site-operating permit (SOP) use the information contained in the Applicable Requirements Summary of the SOP to complete this form.
- The owner or operator shall be in compliance with the CAM and /or PM requirements no later than the date of issuance of the SOP. If the CAM additions proposed by the owner or operator require installation, testing, or final verification of the operational status of the monitoring equipment, after the date of SOP issuance, the owner or operator shall include an implementation plan and schedule as an attachment to this form [40 CFR § 64.4(e)]. The details of the CAM implementation plan and schedule will be included in the SOP as an enforceable plan and schedule including milestones such as installation, testing, or final verification of the monitoring equipment [40 CFR § 64.6(d)]. However, in no case shall the CAM schedule for completing the installation, testing, or final verification exceed 180 days after issuance of the SOP.

- *The owner or operator shall be in compliance with the CAM or PM requirements contained in a general operating permit (GOP) no later than 180 days from the date the GOP containing the CAM or PM requirements is effective.*

The TCEQ also requires that a Core Data Form be submitted with all incoming registrations unless **all** of the following are met: the Regulated Entity Reference Number (RN) and Customer Reference Numbers (CN) have been issued by the TCEQ and no core data information has changed. The Central Registry is a common record area of the TCEQ, which maintains information about TCEQ customers and regulated activities, such as company names, addresses, and telephone numbers. This information is commonly referred as, "core data." The Central Registry provides the regulated community with a central access point within the agency to check core data and make changes when necessary. When core data about a facility is moved to the Central Registry, two new identification numbers are assigned: the CN and the RN. The Core Data Form is required if facility records are not yet part of the Central Registry or if core data for a facility has changed. If this is the initial registration, permit, or license for a facility site, then the Core Data Form must be completed and submitted with application or registration forms. If amending, modifying, or otherwise updating an existing record for a facility site, the Core Data Form is not required, unless any core data information has changed. To review additional information regarding the Central Registry, go to the TCEQ Web site at, www.tceq.texas.gov/nav/permitting/central_registry/guidance.html.

Please submit all application forms and supporting documents to:		
Who	Where	What
Air Permits Division, TCEQ	Regular, Certified, Priority Mail: Mail Code 163, P.O. Box 13087, Austin, Texas 78711-3087 OR Hand Delivery, Overnight Mail: Mail Code 163, 12100 Park 35 Circle, Building C, Third Floor, Reception Austin, Texas 78753	One original copy of Form OP-CRO1; and the TCEQ Core Data Form
Electronic Web Based Forms	www.tceq.texas.gov/permitting/air/air_permits.html	TCEQ Web site
Appropriate TCEQ Regional Office	To find your Regional Office go to the TCEQ Website at www.tceq.texas.gov/publications/gi/gi-002.html or you can call (512) 239-1250	One original copy of Form OP-CRO1; and the TCEQ Core Data Form

Specific:

Page 1

Table 1a: CAM/PM Additions

- ★ **Complete Table 1a only if utilizing a monitoring option contained in a CAM guidance document or a PM guidance document. If choosing to submit a case-by-case determination for either CAM or PM, complete Table 1c of this form.**

I. **Identifying Information**

- **Account No.:** Enter the primary TCEQ account number for the site if issued (XX-XXXX-X).
- **RN No.:** Enter the regulated entity reference number (RN) for the site if issued. This number is issued by the TCEQ as part of the central registry process. If an RN has not yet been issued, leave this space blank. Do not enter permit numbers, project numbers, account numbers, etc. in this space (maximum 11 characters; RNXXXXXXXXXX).
- **CN No.:** Enter the customer reference number (CN) if issued. This number is issued by the TCEQ as part of the central registry process. If a CN has not yet been issued, leave this space blank. Do not enter permit numbers, project numbers, account numbers, etc. in this space (maximum 11 characters; CNXXXXXXXXXX).
- **Permit No.:** Enter the operating permit number, if known (OXXXXX). If this is an initial application submittal for an SOP, a Temporary Operating Permit (TOP), or a GOP, the permit number will be assigned upon receipt by the TCEQ. In this case, enter "TBA" for "to be assigned." The permit number will appear on all correspondence from the TCEQ regarding a specific application or group of applications. The applicant may contact the permit review engineer for assistance.
- **Project No.:** Enter the project number that identifies this specific permitting action. If this is an initial application submittal for (SOP, TOP, or GOP), the project number will be assigned upon receipt by the TCEQ. In this case, enter "TBA" for "to be assigned." The project number will appear on all correspondence from the TCEQ regarding a specific permitting action or group of actions. The applicant may contact the permit review engineer for assistance.
- **Area Name:** Enter the area name used on Form OP-1 (Site Information Summary) of the initial application. If there is only one permit at the site, the area name is the same as the site name (maximum 50 characters).
- **Company Name:** Enter the name of the company, corporation, organization, individual, etc. applying for or holding the referenced permit (maximum 50 characters).

II. **Unit/Emission Point/Group/Process Information**

- **Revision No.:** Enter the revision number identified on Form OP-2 (Application for Permit Revision). This number will link the specific set of applicable requirements to the appropriate permit revision. Please refer to the TCEQ guidance document (Application Guidance Document for Permit Revision Process), for additional information regarding the permit revision process.
- **Unit/EPN/Group/Process ID No.:** Enter the identification number (ID No.) for the unit, emission point (EPN), group, or process that is subject to CAM or PM.

- **Applicable Form:** Enter the number of the Unit Attribute (UA) forms, which contains the specific information regarding the corresponding emission unit, emission point, group, or process (Forms *OP-UA03*, *OP-UA07*, and *OP-UA10*). For an emission unit, emission point, group, or process for which the only applicable requirement is 30 TAC Chapter 106 or 116, enter *OP-UA01* as the applicable form.

III. Applicable Regulatory Requirement

- **Name:** Enter the name of the underlying applicable requirement for which CAM or PM is required (*30 TAC Chapters 106, 111, 112, 113, 115, 116, 117; NSPS XXX, NESHAP XX*).

Note: When entering 30 TAC Chapter 106 or 116 for New Source Review (NSR) construction authorizations, review the underlying NSR authorization to determine if the emission limitations or standards contained in the construction authorization needs CAM or PM. CAM and PM apply only to the emission limitations or standards, with respect to each regulated air pollutant, contained in the individual construction authorizations required by 30 TAC Chapter 106 or 116.

- **SOP/GOP Index No.:** Enter the SOP or GOP index number for which CAM or PM is required.
- **Pollutant:** Select one of the following codes to identify the pollutant of the underlying applicable requirement for which CAM or PM is required. Enter the code for the pollutant contained in the description.

<u>Code</u>	<u>Description</u>
CO	Carbon monoxide
NO _x	Nitrogen oxides (NO _x)
VOC	Volatile organic compounds
SO ₂	Sulfur dioxide
PB	Lead
PM ₁₀	Particulate matter less than 10 microns
PM	Particulate matter (<i>use this code for any regulatory requirement under any Title 40 Code of Federal Regulations Part 60 [40 CFR Part 60] subpart section or 30 TAC Chapter 111 section where the standard, as designated by the TCEQ Requirements Reference Tables (RRT) and flowchart, is for particulate matter</i>)
PM (OPACITY)	Opacity of particulate matter
OTH	Other

- **Main Standard:** Enter the citation of the applicable main standard of the rule [*§111.XXX(x)(yy)(zz); §60.XXX(x)(yy)(zz)*]. For NSR authorizations enter the PBR citation and version date [*106.XXX/MM/DD/YYYY or XXX/ MM/DD/YYYY*] or the NSR permit number [*NSR-XXXXXX*].

<u>Code Format</u>	<u>Description</u>
106.XXX/MM/DD/YYYY	Authorized on or after March 14, 1997
XXX/MM/DD/YYYY	Authorized prior to March 14, 1997

Note: XXX = 30 TAC Chapter 116 standard exemption number or 30 TAC Chapter 106 PBR number. MM/DD/YYYY = Standard exemption or PBR effective date, approval date, or modification completion date.

IV. Title V Monitoring Information

- **Monitoring Type:** Select one of the following codes to describe the type of monitoring the unit/emission point/group/process is subject to:

<u>Code</u>	<u>Description</u>
CAM	Compliance Assurance Monitoring
PM	Periodic Monitoring

Note: For additional information relating to the applicability of CAM or PM see 30 TAC Chapter 122.

★ Complete “Unit Size” only if “Monitoring Type” is “CAM.”

- **Unit Size:** Select one of the following codes to describe the size of the emission unit, emission point, group, or process:

<u>Code</u>	<u>Description</u>
SM	Emission units, emission units associated with emission points, or processes with a pre-control device potential to emit greater than the major source thresholds, but post-control device potential to emit less than the major source thresholds.
LG	Emission units, emission units associated with emission points, or processes with a pre-control device and post-control device potential to emit greater than the major source thresholds.
BOTH	Groups or processes contain both emission units, emission units associated with emission points, or processes with pre-control device potential to emit greater than the major source thresholds, but post-control device potential to emit less than the major source thresholds and a pre-control device and post-control device potential to emit greater than the major source thresholds.

- **CAM/PM Option No.:** For applicants utilizing a monitoring option contained in the CAM guidance document or the PM guidance document, indicate the appropriate option number from the appropriate guidance document. If choosing to submit a case-by-case determination for either CAM or PM, leave this column blank and complete Table 1c of this form.
- **Deviation Limit:** Enter the value, range, or condition in the space provided that establishes the boundary for each indicator of performance (maximum 250 characters consisting of alphanumeric characters). Enter the deviation limit that corresponds with the CAM/PM Option Number contained in Table 1a, Section IV. If entering a deviation limit for CAM, the deviation limit, as defined in 30 TAC § 122.10, must meet the monitoring design criteria specified in 40 CFR § 64.3. In addition, the deviation limit may be expressed as a value, a range, or a condition. The deviation limit may be based on a single maximum or minimum value, if applicable, or at multiple levels that are relevant to distinctly different operating conditions (e.g., high versus low load levels). The deviation limit may be expressed as a function of process variables, expressed as maintaining the applicable parameter in a particular operational status or designated condition, or established as interdependent between more than one indicator.

The CAM or PM guidance document provides either the procedures for establishing the deviation limit or the actual deviation limit based on the CAM or PM option number chosen by the applicant.

In addition, as required by 40 CFR § 64.4 and 30 TAC Chapter 122, submit as an attachment to this form, control device operating parameter data obtained during the most recent performance test (conducted under conditions specified by the underlying applicable requirement), manufacturer's recommendations, engineering calculations, and/or historical data to justify the deviation limit (value, range, or condition) that establishes the boundary for each indicator of performance. Also, if establishing deviation limits based on a monitoring plan submitted to the administrator in accordance with 40 CFR Part 63, attach the monitoring plan to the form. Even though 40 CFR Part 63 emission limits are exempt from CAM and PM, the 40 CFR Part 63 monitoring plan can be used as justification for the deviation limits for other applicable requirements.

Example Deviation Limits		
Control Device	Indicator	Deviation Limit
Carbon Adsorption System	Volatile Organic Compound (VOC) Concentration	Maximum VOC Concentration – 20 ppmv
Thermal Incinerator	Combustion Temperature	Minimum Temperature = 1300 °F
Flare	Net Heating Value	Minimum Net Heating Value = 350 Btu/scf
Electrostatic Precipitator	Spark Rate	Minimum Spark Rate = 10 sparks/minute Maximum Spark Rate = 20 sparks/minute
Fabric Filter	Pressure Drop	Minimum Pressure Drop = 6 psia Maximum Pressure Drop = 12 psia
Wet Scrubber	Liquid Flow Rate	Minimum Liquid Flow Rate = Range of 60 gal/min at 100% heat input capacity (Maximum load equal to 40 MMBtu/hr) to 30 gal/min at 60% heat input capacity (minimum load equal to 24 MMBtu/hr).

★ **Complete “CAM/PM Option No.” and “Deviation Limit” only if utilizing more than one monitoring option from the CAM/PM guidance document.**

- **CAM/PM Option NO.:** Enter an additional CAM/PM option number if the monitoring option utilized by the applicant has more than one CAM/PM option number. If the monitoring option utilized by the applicant contains more than two option numbers, fill out an additional Table 1a for the additional CAM/PM option number.
- **Deviation Limit:** Enter the deviation limit that corresponds with the additional CAM/PM option number. See the above instructions contained in Table 1a, Section IV. of this form for the detailed information that pertains to “Deviation Limit.”

V. Control Device Information

★ **Complete “Control Device ID No.” and “Device Type” only if utilizing a control device.**

- **Control Device ID No.:** If applicable, enter the identification number (ID No.) for the control device. If not utilizing a control device, leave this column blank. If more than one control device is used for a unit, add the additional control device(s) ID No(s) to Table 1b.
- **Control Device Type:** Select one of the following codes for the control device type. If more than one control device is used for a unit, add the additional control device(s) type(s) to Table 1b.

<u>Code</u>	<u>Description</u>
DIRFLM	Thermal incinerator (direct flame incinerator/regenerative thermal oxidizer)
CHILL	Condenser system (chiller)
CATINC	Catalytic incinerator
CRBAD1	Carbon adsorption system (regenerative)
CRBAD2	Carbon adsorption system (non-regenerative)
FLARE	Flare
COMB	Vapor combustor
BOIL1	Steam generating unit (boiler)/process heater (design heat input is less than 44MW)
BOIL2	Steam generating unit (boiler)/process heater (design heat input is greater than or equal to 44MW)
ABSOR1	Absorber (caustic absorber)
ABSOR2	Absorber (direct absorption)
WETSCR	Wet scrubber
ESP	Wet or dry electrostatic precipitator
FABFLT	Fabric filter
CYCLN	Cyclone
SCR	Selective catalytic reduction (SCR)
SNCR	Selective non-catalytic reduction (SNCR)
FGR	Flue gas recirculation
SWIS	Steam/water injection system
CATCNV	Catalytic converters
SO2SCR	SO ₂ scrubber
SRUFLR	Sulfur recovery unit with flare
SRUINC	Sulfur recovery unit with incinerator
CVS	Vapor collection system (closed vent system)
OTH	Other control device type

Page 2

Table 1b: CAM/PM Control Device Additions

- ★ **Complete this table only if utilizing a Group ID No. in Table 1a, Section II. or if more than one control device is used for an emission unit.**
- **Unit ID No.:** Enter the identification number (ID No.) for the unit that is subject to CAM or PM. For emission unit groups identified in Table 1a, Section II, each emission unit within a group must be listed separately to correctly identify the specific control devices that are controlling emissions from each emission unit within the group.
 - **Control Device ID No.:** Enter the identification number (ID No.) for the control device.
 - **Device Type:** Select one of the following codes for the control device type.

<u>Code</u>	<u>Description</u>
DIRFLM	Thermal incinerator (direct flame incinerator/regenerative thermal oxidizer)
CHILL	Condenser system (chiller)
CATINC	Catalytic incinerator
CRBAD1	Carbon adsorption system (regenerative)
CRBAD2	Carbon adsorption system (non-regenerative)
FLARE	Flare
COMB	Vapor combustor
BOIL1	Steam generating unit (boiler)/process heater (design heat input is less than 44MW)
BOIL2	Steam generating unit (boiler)/process heater (design heat input is greater than or equal to 44MW)
ABSOR1	Absorber (caustic absorber)
ABSOR2	Absorber (direct absorption)
WETSCR	Web scrubber
ESP	Wet or dry electrostatic precipitator
FABFLT	Fabric filter
CYCLN	Cyclone
SCR	Selective catalytic reduction (SCR)
SNCR	Selective non-catalytic reduction (SNCR)
FGR	Flue gas recirculation
SWIS	Steam/water injection systems
CATCNV	Catalytic converters
SO2SCR	SO ₂ scrubber

SRUFLR	Sulfur recovery unit with flare
SRUINC	Sulfur recovery unit with incinerator
CVS	Vapor collection system (closed vent system)
OTH	Other control device

Page 3

Table 1c: CAM/PM Case-by-case Additions

- ★ **Complete Table 1c only if submitting a case-by-case determination for either CAM or PM. If choosing to utilize a monitoring option contained in the CAM guidance document or the PM guidance document, fill out Table 1a and, if necessary, Table 1b.**

I. Identifying Information

- **Account No.:** Enter the primary TCEQ account number for the site if issued (XX-XXXX-X).
- **RN No.:** Enter the regulated entity reference number (RN) for the site if issued. This number is issued by the TCEQ as part of the central registry process. If an RN has not yet been issued, leave this space blank. Do not enter permit numbers, project numbers, account numbers, etc. in this space (maximum 11 characters; RNXXXXXXXXXX).
- **CN No.:** Enter the customer reference number (CN) if issued. This number is issued by the TCEQ as part of the central registry process. If a CN has not yet been issued, leave this space blank. Do not enter permit numbers, project numbers, account numbers, etc. in this space (maximum 11 characters; CNXXXXXXXXXX).
- **Permit No.:** Enter the operating permit number, if known (OXXXXX). If this is an initial application submittal for an SOP, a TOP, or a GOP, the permit number will be assigned upon receipt by the TCEQ. In this case, enter "TBA" for "to be assigned." The permit number will appear on all correspondence from the TCEQ regarding a specific application or group of applications. The applicant may contact the permit review engineer for assistance.
- **Project No.:** Enter the project number that identifies this specific permitting action. If this is an initial application submittal for (SOP, TOP, or GOP), the project number will be assigned upon receipt by the TCEQ. In this case, enter "TBA" for "to be assigned." The project number will appear on all correspondence from the TCEQ regarding a specific permitting action or group of actions. The applicant may contact the permit review engineer for assistance.
- **Area Name:** Enter the area name used on Form OP-1 (Site Information Summary) of the initial application. If there is only one permit at the site, the area name is the same as the site name (maximum 50 characters).
- **Company Name:** Enter the name of the company, corporation, organization, individual, etc. applying for or holding the referenced permit (maximum 50 characters).

II. Unit/Emission Point/Group/Process Information

- **Revision No.:** Enter the revision number identified on Form OP-2 (Application for Permit Revision). This number will link the specific set of applicable requirements to the appropriate permit revision. Please refer to the TCEQ guidance document (Application Guidance Document for Permit Revision Process") for additional information regarding the permit revision process.
- **Unit/EPN/Group/Process ID No.:** Enter the identification number (ID. No.) for the unit, emission point (EP), group, or process that is subject to CAM or PM.

- **Applicable Form:** Enter the number of the UA forms which contain the specific information regarding the corresponding emission unit, emission point, group, or process (*Forms OP-UA03, OP-UA07, OP-UA10*). For an emission unit, emission point, group, or process for which the only applicable requirement is 30 TAC Chapter 106 or 116, enter Form OP-UA01 as the applicable form.

III. Applicable Regulatory Requirement

- **Name:** Enter the name of the underlying applicable requirement for which CAM or PM is required (*Chapter 106, 111, 112, 113, 115, 116, 117; NSPS XXX, NESHAP XX*).

Note: When entering 30 TAC Chapter 106 or 116 for NSR construction authorizations, review the underlying NSR authorization to determine if the emission limitations or standards contained in the construction authorization needs CAM or PM. CAM and PM apply only to the emission limitations or standards, with respect to each regulated air pollutant, contained in the individual construction authorizations required by 30 TAC Chapter 106 or 116.

- **SOP Index No.:** Enter the standard operating procedure (SOP) index number for which CAM or PM is required.
- **Pollutant:** Enter the pollutant of the underlying applicable requirement for which CAM or PM is required (for pollutant codes and descriptions see instructions for Table 1a, Section III.).
- **Main Standard:** Enter the citation of the applicable main standard of the rule [*§111.XXX(x)(yy)(zz), §60.XXX(x)(yy)(zz)*]. For NSR authorizations enter the PBR citation and version date [*106.XXX/MM/DD/YYYY or XXX/MM/DD/YYYY*] or the NSR permit number [*NSR-XXXXX*].

<u>Code Format</u>	<u>Description</u>
106.XXX/MM/DD/YYYY	Authorized on or after March 14, 1997
XXX/MM/DD/YYYY	Authorized prior to March 14, 1997

Note: XXX = 30 TAC Chapter 116 standard exemption number or 30 TAC Chapter 106 PBR number; MM/DD/YYYY = Standard exemption or PBR effective date, approval date, or modification completion date.

- **Monitoring Type:** Select one of the following codes to describe the type of monitoring the unit/emission point/group/process is subject to:

<u>Code</u>	<u>Description</u>
CAM	Compliance Assurance Monitoring
PM	Periodic Monitoring

Note: For additional information relating to the applicability of CAM or PM see 30 TAC Chapter 122.

★ Complete “Unit Size” only if “Monitoring Type” is “CAM.”

- **Unit Size:** Select one of the following codes to describe the size of the emission unit or process:

<u>Code</u>	<u>Description</u>
SM	Emission units, emission units associated with emission points, or processes with a pre-control device potential to emit greater than the major source thresholds, but post-control device potential to emit less than the major source thresholds.
LG	Emission units, emission units associated with emission points, or processes with a pre-control device and post-control device potential to emit greater than the major source thresholds.

BOTH

Groups or processes contain both emission units, emission units associated with emission points, or processes with pre-control device potential to emit greater than the major source thresholds, but post-control device potential to emit less than the major source thresholds **and** a pre-control device and post-control device potential to emit greater than the major source thresholds.

- **Deviation Limit:** Enter the value, range, or condition in the space provided that establishes the boundary for each indicator of performance (maximum 250 characters consisting of alphanumeric characters). If entering a deviation limit for CAM, the deviation limit, as defined in 30 TAC § 122.10, must meet the monitoring design criteria specified in 40 CFR§ 64.3. The deviation limit may be based on a single maximum or minimum value, if applicable, or at multiple levels that are relevant to distinctly different operating conditions (e.g., high versus low load levels). The deviation limit may be expressed as a function of process variables, expressed as maintaining the applicable parameter in a particular operational status or designated condition, or established as interdependent between more than one indicator.

For CAM or PM case-by-case determinations, establish the deviation limit in accordance with these instructions. The CAM deviation limits must also be established in accordance with the design and performance requirements of 40 CFR § 64.3.

In addition, as required by 40 CFR § 64.4 and 30 TAC Chapter 122, submit, as an attachment to this form, control device operating parameter data obtained during the most recent performance test (conducted under conditions specified by the underlying applicable requirement), manufacturer's recommendations, engineering calculations, and/or historical data to justify the deviation limit (value, range, or condition) that establishes the boundary for each indicator of performance. Also, if establishing a deviation limits based on a monitoring plan submitted to the administrator in accordance with 40 CFR Part 63, attach the monitoring plan to the form. Even though 40 CFR Part 63 emission limits are exempt from CAM and PM, the 40 CFR Part 63 monitoring plan can be used as justification for the deviation limits for other applicable requirements.

Example Deviation Limits		
Control Device	Indicator	Deviation Limit
Carbon Adsorption System	(VOC) Concentration	Maximum VOC Concentration – 20 ppmv
Thermal Incinerator	Combustion Temperature	Minimum Temperature = 1300 °F
Flare	Net Heating Value	Minimum Net Heating Value = 350 Btu/scf
Electrostatic Precipitator	Spark Rate	Minimum Spark Rate = 10 sparks/minute Maximum Spark Rate = 20 sparks/minute
Fabric Filter	Pressure Drop	Minimum Pressure Drop = 6 psia Maximum Pressure Drop = 12 psia
Wet Scrubber	Liquid Flow Rate	Minimum Liquid Flow Rate = Range of 60 gal/min at 100% heat input capacity (Maximum load equal to 40 MMBtu/hr) to 30 gal/min at 60% heat input capacity (minimum load equal to 24 MMBtu/hr).

IV. Control Device Information

★ **Complete “Control Device ID No.” and “Device Type” only if utilizing a control device.**

- **Control Device ID No.:** If applicable, enter the identification for the control device. If not utilizing a control device, then leave this column blank. If more than one control device is used for a unit, add the additional control device(s) ID No.(s) to Table 1d.
- **Device Type:** Select one of the following codes for the control device type. If more than one control device is used for a unit, add the additional control device(s) type(s) to Table 1d.

<u>Code</u>	<u>Description</u>
DIRFLM	Thermal incinerator (direct flame incinerator/regenerative thermal oxidizer)
CHILL	Condenser system (chiller)
CATINC	Catalytic incinerator
CRBAD1	Carbon adsorption system (regenerative)
CRBAD2	Carbon adsorption system (non-regenerative)
FLARE	Flare
COMB	Vapor combustor
BOIL1	Steam generating unit (boiler)/process heater (design heat input is less than 44MW)
BOIL2	Steam generating unit (boiler)/process heater (design heat input is greater than or equal to 44MW)

ABSOR1	Absorber (caustic absorber)
ABSOR2	Absorber (direct absorption)
WETSCR	Wet scrubber
ESP	Wet or dry electrostatic precipitator
FABFLT	Fabric filter
CYCLN	Cyclone
SCR	Selective catalytic reduction (SCR)
SNCR	Selective non-catalytic reduction (SNCR)
FGR	Flue gas recirculation
SWIS	Steam/water injection system
CATCNV	Catalytic converters
SO2SCR	SO2 scrubber
SRUFLR	Sulfur recovery unit with flare
SRUINC	Sulfur recovery unit with incinerator
CVS	Vapor collection system (closed vent system)
OTH	Other control device type

V. CAM Case-by-case

- Indicator:** Identify one or more indicators of emission control performance for the control device, any associated capture system, any control device or capture system bypass and, if necessary, process at a pollutant-specific emission unit (maximum 100 characters consisting of alphanumeric characters). The indicators identified must be consistent with the requirements of 40 CFR § 64.3. The owner or operator must monitor indicators to detect any bypass of the control device (or capture system) to the atmosphere, if such bypass can occur based on the design of the pollutant-specific emissions unit.

In addition, submit in the form or as an attachment to the form, justification for the proposed indicator in accordance with 40 CFR § 64.4. Also, if choosing to monitor an indicator consistent with a monitoring plan submitted to the administrator in accordance with 40 CFR Part 63, attach the monitoring plan to the form. Even though 40 CFR Part 63 emission limits are exempt from CAM, the 40 CFR Part 63 monitoring plan can be used as justification to monitor the proposed indicator for other applicable requirements.

- Minimum Frequency:** Identify the frequency of conducting the monitoring (maximum 50 characters consisting of alphanumeric characters). The monitoring frequencies must be consistent with the minimum monitoring frequency requirements of 40 CFR § 64.3.

In addition, submit in the form or as an attachment to the form, justification for the proposed monitoring frequency in accordance with 40 CFR § 64.4. Also, if proposing a minimum monitoring frequency consistent with a monitoring plan submitted to the administrator in accordance with 40 CFR Part 63, attach the monitoring plan to the form. Even though 40 CFR Part 63 emission limits are exempt from CAM, the 40 CFR Part 63 monitoring plan can be used as justification to monitor at a specific minimum monitoring frequency for other applicable requirements.

- **Averaging Period:** Identify the period over which discrete data points will be averaged for the purpose of determining whether a deviation has occurred (maximum 30 characters consisting of alphanumeric characters). The averaging period must be consistent with the requirements of 40 CFR § 64.3.

In addition, submit in the form or as an attachment to the form, justification for the proposed averaging period in accordance with 40 CFR § 64.4. Also, if proposing an averaging period consistent with a monitoring plan submitted to the administrator in accordance with 40 CFR Part 63, attach the monitoring plan to the form. Even though 40 CFR Part 63 emission limits are exempt from CAM, the 40 CFR Part 63 monitoring plan can be used as justification to propose a specific averaging period for other applicable requirements.

- **Quality Assurance and Quality Control Procedures:** Identify quality assurance and quality control procedures that are adequate to ensure the continuing validity of the data. This includes the data collection procedures that will be used (e.g., computerized data acquisition and handling, alarm sensor, or manual log entries based on gauge readings) and the specifications that provide for obtaining data that are representative of the emissions or parameters being monitored (such as calibration frequency, monitoring device accuracy, test methods). The applicant will consider manufacturer recommendations or requirements applicable to the monitoring in developing appropriate quality assurance and quality control practices. The quality assurance and quality control (QA/QC) procedures must be consistent with the requirements of 40 CFR § 64.3.

In addition, submit in the form or as an attachment to the form, justification for the proposed QA/QC procedures in accordance with 40 CFR § 64.4. Also, if proposing QA/QC procedures consistent with a monitoring plan submitted to the administrator in accordance with 40 CFR Part 63, attach the monitoring plan to the form. Even though 40 CFR Part 63 emission limits are exempt from CAM, the 40 CFR Part 63 monitoring plan can be used as justification to propose specific QA/QC procedures for other applicable requirements.

- **Verification Procedures:** Identify the verification procedures used to confirm the operational status of the monitoring system. The owner or operator should consider the monitoring equipment manufacturer's requirements or recommendations for installation, calibration, and start-up operation. An example of a verification procedure is utilizing a manufacturer specified type of thermocouple and calibration frequency. The verification procedures must be consistent with the requirements of 40 CFR § 64.3.

In addition, submit in the form or as an attachment to the form, justification for the verification procedures in accordance with 40 CFR § 64.4. Also, if proposing verification procedures consistent with a monitoring plan submitted to the administrator in accordance with 40 CFR Part 63, attach the monitoring plan to the form. Even though 40 CFR Part 63 emission limits are exempt from CAM, the 40 CFR Part 63 monitoring plan can be used as justification to propose specific verification procedures for other applicable requirements.

- **Representative Data:** Identify specifications that provide for obtaining data that are representative of the emission or parameters being monitored. This could include such things as the location of the monitoring device and the installation specifications provided by the manufacturer. The procedures for obtaining representative data must be consistent with the requirements of 40 CFR § 64.3.

In addition, submit in the form or as an attachment to the form, justification that the data is representative of the emission or parameters being monitored in accordance with 40 CFR § 64.4. Also, if proposing specifications that provide for obtaining representative data consistent with a monitoring plan submitted to the administrator in accordance with 40 CFR Part 63, attach the monitoring plan to the form. Even though 40 CFR Part 63 emission limits are exempt from CAM, the 40 CFR Part 63 monitoring plan can be used as justification to propose specifications that provide for obtaining representative data for other applicable requirements.

VI. Periodic Monitoring Case-by-case

- **Indicator:** Identify one or more indicators of emission control performance for the control device, or the parameter to be monitored if a control device is not utilized. Indicators may include, but are not limited to, direct or predicted emissions (including visible emissions or opacity), control device parameters, process parameters which are correlated to an emission rate through performance testing or AP-42 emission factors, or recorded finding of inspection and maintenance activities conducted by the owner or operator. In addition, submit in the form or as an attachment to the form, justification for the proposed indicator. Also, if choosing to monitor an indicator consistent with a monitoring plan submitted to the administrator in accordance with 40 CFR Part 63, attach the monitoring plan to the form. Even though 40 CFR Part 63 emission limits are exempt from PM, the 40 CFR Part 63 monitoring plan can be used as justification to monitor the proposed indicator for other applicable requirements.
- **Minimum Frequency:** Identify the frequency of conducting the monitoring. The monitoring frequencies should be consistent with the minimum monitoring frequency found in the applicable PM guidance document. For example, control device parameters may be monitored once per week. In addition, submit in the form or as an attachment to the form, justification for the proposed monitoring frequency. Also, if proposing a minimum monitoring frequency consistent with a monitoring plan submitted to the administrator in accordance with 40 CFR Part 63, attach the monitoring plan to the form. Even though 40 CFR Part 63 emission limits are exempt from PM, the 40 CFR Part 63 monitoring plan can be used as justification to monitor at a specific minimum monitoring frequency for other applicable requirements.
- **Averaging Period:** If applicable, identify the period over which discrete data points will be averaged for the purpose of determining whether a deviation has occurred. In addition, submit, in the form or as an attachment to the form, justification for the proposed averaging period. If an equivalent averaging period in the guidance document cannot be found, specify an averaging period, if applicable, consistent with the characteristics and typical variability of the pollutant-specific emissions unit (including the control device and associated capture system). Such intervals must be commensurate with the time period over which a change in control device performance that would require actions by the owner or operator to return operations within normal ranges or designated conditions is likely to be observed. Also, if proposing an averaging period consistent with a monitoring plan submitted to the administrator in accordance with 40 CFR Part 63, attach the monitoring plan to the form. Even though 40 CFR Part 63 emission limits are exempt from PM, the 40 CFR Part 63 monitoring plan can be used as justification to propose a specific averaging period for other applicable requirements.
- **Periodic Monitoring Text:** Identify the data collection procedures that will be used (e.g., computerized data acquisition and handling, alarm sensor, or manual log entries based on gauge readings) and procedures that provide for obtaining data (e.g. test methods) (maximum 4000 characters consisting of alphanumeric characters). Also, if proposing monitoring procedures consistent with a monitoring plan submitted to the administrator in accordance with 40 CFR Part 63, attach the monitoring plan to the form. Even though 40 CFR Part 63 emission limits are exempt from PM, the 40 CFR Part 63 monitoring plan can be used as justification to propose monitoring procedures for other applicable requirements.

Submit, as an attachment to this form, justification that the proposed periodic monitoring provides an assurance of compliance with the emission limit or work practice standard that the emission unit is subject to.

Page 4

Table 1d: CAM/PM Case-by-case Control Device Additions

★ Complete this table only if utilizing a Group ID No. in Table 1c, Section II. or if more than one control device is used for a unit. Table 1d is to identify control device information for all emission units contained in a group. Complete the following only if utilizing a control device for a unit contained in a group.

- **Emission Unit ID No.:** Enter the identification number (ID No.) for the unit that is subject to CAM or PM and is contained in the group identified in Table 1c, Section II.
- **Control Device ID No.:** Enter the identification number (ID No.) for the control device.
- **Control Device Type:** Select one of the following codes for the control device type.

<u>Code</u>	<u>Description</u>
DIRFLM	Thermal incinerator (direct flame incinerator/regenerative thermal oxidizer)
CHILL	Condenser system (chiller)
CATINC	Catalytic incinerator
CRBAD1	Carbon adsorption system (regenerative)
CRBAD2	Carbon adsorption system (non-regenerative)
FLARE	Flare
COMB	Vapor combustor
BOIL1	Stream generating unit (boiler) process heater (design heat input is less than 44MW)
BOIL2	Steam generating unit (boiler) heater (design heat input is greater than or equal to 44MW)
ABSOR1	Absorber (caustic absorber)
ABSOR2	Absorber (direct absorption)
WETSCR	Wet scrubber
ESP	Wet or dry electrostatic precipitator
FABFLT	Fabric filter
CYCLN	Cyclone
SCR	Selective catalytic reduction (SCR)
SNCR	Selective non-catalytic reduction (SNCR)
FGR	Flue gas recirculation
SWIS	Steam/water injection systems
CATCNV	Catalytic converters
SO2SCR	SO ₂ scrubber

SRUFLR	Sulfur recovery unit with flare
SRUINC	Sulfur recovery unit with incinerator
CVS	Vapor collection system (closed vent system)
OTH	Other control device type

Page 5

Table 2a: CAM/PM Deletions

- ★ **Complete Table 2a only if deleting a monitoring requirement or control device obtained from the CAM guidance document or the PM guidance document. If applicants are choosing to delete a monitoring requirement or a control device for a CAM or PM case-by-case determination, complete Table 2c of this form.**

I. Identifying Information

- **Account No.:** Enter the primary TCEQ account number for the site if issued.
- **RN No.:** Enter the regulated entity reference number (RN) for the site if issued. This number is issued by the TCEQ as part of the central registry process. If an RN has not yet been issued leave this space blank. Do not enter permit numbers, project numbers, account numbers, etc. in this space (maximum 11 characters; RNXXXXXXXXXX).
- **CN No.:** Enter the customer reference number (CN) if issued. This number is issued by the TCEQ as part of the central registry process. If a CN has not yet been issued, leave this space blank. Do not enter permit numbers, project numbers, account numbers, etc. in this space (maximum 11 characters; CNXXXXXXXXXX).
- **Permit No.:** Enter the operating permit number, if known (OXXXXX). If this is an initial application submittal for an SOP, a TOP, or a GOP, the permit number will be assigned upon receipt by the TCEQ. In this case, enter "TBA" for "to be assigned." The permit number will appear on all correspondence from the TCEQ regarding a specific application or group of applications. The applicant may contact the permit review engineer for assistance.
- **Project No.:** Enter the project number that identifies this specific permitting action. If this is an initial application submittal for (SOP, TOP, or GOP), the project number will be assigned upon receipt by the TCEQ. In this case, enter "TBA" for "to be assigned." The project number will appear on all correspondence from the TCEQ regarding a specific permitting action or group of actions. The applicant may contact the permit review engineer for assistance.
- **Area Name:** Enter the area name used on Form OP-1 (Site Information Summary) of the initial application. If there is only one permit at the site, the area name is the same as the site name (maximum 50 characters).
- **Company Name:** Enter the name of the company, corporation, organization, individual, etc. applying for or holding the referenced permit (maximum 50 characters).

II. Unit/Emission Point/Group/Process Information

- **Revision No.:** Enter the revision number identified on Form OP-2 (Application for Permit Revision.) This number will link the specific set of applicable requirements to the appropriate permit revision. Please refer to the TCEQ guidance document (Application Guidance Document for Permit Revision Process) for additional information regarding the permit revision process.

- **Unit/EPN/Group/Process ID No.:** Enter the identification number (ID No.) for the unit, emission point, group, or process that is subject to CAM or PM or is listed on the applicable requirements summary of the permit.
- **Applicable Form:** Enter the number of the UA forms which contains the specific information regarding the corresponding emission unit, emission point, group, or process (Forms *OP-UA03*, *OP-UA07*, and *OP-UA10*).

III. Applicable Regulatory Requirement

- **Name:** Enter the name of the underlying applicable requirement for which CAM or PM is required (*Chapter 106, 111, 112, 113, 115, 116, 117; NSPS XXX, NESHAP XX*).
- **Note:** When entering 30 TAC Chapter 106 or 116 for NSR construction authorizations, review the underlying NSR authorization to determine if the emission limitations or standards contained in the construction authorization needs CAM or PM. CAM and PM apply only to the emission limitations or standards, with respect to each regulated air pollutant, contained in the individual construction authorizations required by 30 TAC Chapter 106 or 116.
- **SOP/GOP Index No.:** Enter the SOP or GOP index number for which CAM or PM is required.
- **Pollutant:** Enter the pollutant of the underlying applicable requirement for which CAM or PM is required (for pollutant codes and descriptions see instructions for Table 1a, Section III.).
- **Main Standard:** Enter the citation of the applicable main standard of the rule [*§111.XXX(x)(yy)(zz); §60.XXX(x)(yy)(zz)*]. For NSR authorizations enter the PBR citation and version date [*106.XXX/MM/DD/YYYY or XXX/MM/DD/YYYY*] or the NSR permit number [*NSR-XXXXX*].

<u>Code Format</u>	<u>Description</u>
106.XXX/MM/DD/YYYY	Authorized on or after March 14, 1997
XXX/MM/DD/YYYY	Authorized prior to March 14, 1997

Note: XXX = 30 TAC Chapter 116 standard exemption number or 30 TAC Chapter 106 PBR number; MM/DD/YYYY = Standard exemption or PBR effective date, approval date, or modification completion date.

IV. Title V Monitoring Information

- **Monitoring Type:** Select one of the following codes to describe the type of monitoring the unit/group/process is subject to.

<u>Code</u>	<u>Description</u>
CAM	Compliance Assurance Monitoring
PM	Periodic Monitoring

Note: For additional information relating to the applicability of CAM or PM see 30 TAC Chapter 122.

- **CAM/PM Option No.:** If utilizing a monitoring option contained in the CAM guidance document or the PM guidance document, indicate the appropriate option number from the appropriate guidance document.

V. Control Device Information

★ **Complete “Control Device ID No.” and “Device Type” only if utilizing a control device.**

- **Control Device ID No.:** If applicable, enter the identification number (ID No.) for the control device. If not using a control device, leave this column blank.

- **Device Type:** Enter the control device type (for control device codes and descriptions see instructions for Table 1a, Section V.).

VI. Type of Deletion

- **Monitoring Requirement:** Select “Delete” in the space provided to delete the monitoring requirement identified in Table 2a, Section IV for the unit/emission point/group/process identified in Table 2a, Section II. If deleting only the control device, then leave this column blank
- **Control Device:** Select “Delete” in the space provided to delete the control device identified in Table 2a, Section V and Table 2b for the unit/emission point/group/process identified in Table 2a, Section II. If deleting the monitoring requirement, then leave this column blank.

★ **Complete Table 2b only if deleting multiple control devices for a unit or a group of units and if a “Delete” is located in the space for Table 2a, Section VI. Complete the following only if utilizing a control device for a unit contained in the group.**

Page 6

Table 2b: CAM/PM Case-by-case Control Device Deletion (*of the Forms Tables*)

- **Unit ID No.:** Enter the identification number (ID No.) for the unit/emission point/group/process that is subject to CAM or PM and is contained in the group identified in Table 2a, Section II.
- **Control Device ID No.:** If applicable, enter the identification number (ID No.) for the control device to be deleted.
- **Device Type:** Enter the control device type (for control device codes and descriptions see instructions for Table 1a, Section V.).

Page 7

Table 2c: CAM/PM Case-by-case Deletions

★ **Complete Table 2c only if deleting a monitoring requirement or a control device for a CAM or PM case-by-case determination. If applicants are choosing to delete a monitoring requirement or control device obtained from the CAM guidance document or the PM guidance document complete Table 2a and, if necessary, Table 2b.**

I. Identifying Information

- **Account No.:** Enter the primary TCEQ account number for the site if issued (XX-XXXX-X).
- **RN No.:** Enter the regulated entity reference number (RN) for the site if issued. This number is issued by the TCEQ as part of the central registry process. If an RN has not yet been issued, leave this space blank. Do not enter permit numbers, project numbers, account numbers, etc. in this space (maximum 11 characters; RNXXXXXXXXXX).
- **CN No.:** Enter the customer reference number (CN) if issued. This number is issued by the TCEQ as part of the central registry process. If a CN has not yet been issued, leave this space blank. Do not enter permit numbers, project numbers, account numbers, etc. in this space (maximum 11 characters; CNXXXXXXXXXX).
- **Permit No.:** Enter the operating permit number, if known (OXXXXX). If this is an initial application submittal for an SOP, a TOP, or a GOP, the permit number will be assigned upon receipt by the TCEQ. In this case, enter “TBA” for “to be assigned.” The permit number will appear on all correspondence from the TCEQ regarding a specific application or group of applications. The applicant may contact the permit review engineer for assistance.

- **Project No.:** Enter the project number that identifies this specific permitting action. If this is an initial application submittal for (SOP, TOP, or GOP), the project number will be assigned upon receipt by the TCEQ. In this case, enter "TBA" for "to be assigned." The project number will appear on all correspondence from the TCEQ regarding a specific permitting action or group of actions. The applicant may contact the permit review engineer for assistance.
- **Area Name:** Enter the area name used on Form OP-1 (Site Information Summary) of the initial application. If there is only one permit at the site, the area name is the same as the site name (maximum 50 characters).
- **Company Name:** Enter the name of the company, corporation, organization, individual, etc. applying for or holding the referenced permit (maximum 50 characters).

II. Unit/Emission Point/Group/Process Information

- **Revision No.:** Enter the revision number identified on Form OP-2 (Application for Permit Revision). This number will link the specific set of applicable requirements to the appropriate permit revision. Please refer to the TCEQ guidance document (Application Guidance Document for Permit Revision Process) for additional information regarding the permit revision process.
- **Unit/EPN/Group/Process ID No.:** Enter the identification number (ID No.) for the unit, emission point, group, or process that is subject to CAM or PM.
- **Applicable Form:** Enter the number of the UA form, which contains the specific information regarding the corresponding emission unit, emission point, group, or process (*OP-UA03, OP-UA07, and OP-UA10*).

III. Applicable Regulatory Requirement

- **Name:** Enter the name of the underlying applicable requirement for which CAM or PM is required (*Chapter 106, 111, 112, 113, 115, 116, 117; NSPS XXX, NESHAP XX*).

Note: When entering 30 TAC Chapter 106 or 116 for NSR construction authorizations, review the underlying NSR authorization to determine if the emission limitations or standards contained in the construction authorization needs CAM or PM. CAM and PM apply only to the emission limitations or standards, with respect to each regulated air pollutant, contained in the individual construction authorizations required by Chapter 106 or 116.

- **SOP Index No.:** Enter the SOP index number for which CAM or PM is required.
- **Pollutant:** Enter the pollutant of the underlying applicable requirement for which CAM or PM is required (for pollutant codes and descriptions see instructions for Table 1a, Section III.).
- **Main Standard:** Enter the citation of the applicable main standard of the rule [*§ 111.XXX(x)(yy)(zz); § 60.XXX(x)(yy)(zz)*]. For NSR authorizations enter the PBR citation and version date [*106.XXX/MM/DD/YYYY or XXX/MM/DD/YYYY*] or the NSR permit number [*NSR-XXXXX*].

<u>Code Format</u>	<u>Description</u>
106.XXX/MM/DD/YYYY	Authorized on or after March 14, 1997
XXX/MM/DD/YYYY	Authorized prior to March 14, 1997

Note: XXX = 30 TAC Chapter 116 standard exemption number or 30 TAC Chapter 106 PBR number; MM/DD/YYYY = Standard exemption or PBR effective date, approval date, or modification completion date.

IV. Title V Monitoring Information

- **Monitoring Type:** Select one of the following codes to describe the type of monitoring the unit/emission point/group/process is subject to:

<u>Code</u>	<u>Description</u>
CAM	Compliance Assurance Monitoring
PM	Periodic Monitoring

Note: For additional information relating to the applicability of CAM or PM, see 30 TAC Chapter 122.

V. Control Device Information★ **Complete “ID No.” and “Type” only if utilizing a control device.**

- **Control Device ID No.:** If applicable, enter the identification number (ID No.) for the control device. If not utilizing a control device, leave this column blank.
- **Control Device Type:** Enter the control device type (for control device codes and descriptions see instructions for Table 1a, Section V.).

VI. Type of Deletion

- **Monitoring Requirement:** Select “Delete” to delete the monitoring requirement identified in the case-by-case determination for the unit/process identified in Table 2c, Section II. If deleting only the control device, then select “Blank” to leave this column blank.
- **Control Device:** Select “Delete,” to delete the control device identified in Table 2c, Section V. for the unit/process identified in Table 2c, Section II. If deleting monitoring requirement, then select “Blank” to leave this column blank.

Page 8**Table 2d: CAM/PM Control Device Deletions**

- ★ **Complete Table 2d only if deleting multiple control devices for a unit or a group of units and if a “Delete” is located in the space for Table 2c, Section VI. Complete the following only if utilizing a control device for a unit contained in the group.**
 - **Unit ID No.:** Enter the identification number (ID No.) for the unit/emission point/group/process that is subject to CAM or PM and is contained in the group identified in Table 2c, Section II.
 - **Control Device ID No.:** If applicable, enter the identification number (ID No.) for the control device to be deleted.
 - **Control Device Type:** Enter the control device type (for control device codes and descriptions see instructions for Table 1a, Section V.).

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

I. Identifying Information		
Account No.:	RN No.:	CN:
Permit No.:	Project No.:	
Area Name:		
Company Name:		
II. Unit/Emission Point/Group/Process Information		
Revision No.:		
Unit/EPN/Group/Process ID No.:		
Applicable Form:		
III. Applicable Regulatory Requirement		
Name:		
SOP/GOP Index No.:		
Pollutant:		
Main Standard:		
IV. Title V Monitoring Information		
Monitoring Type:		
Unit Size:		
CAM/PM Option No.:		
Deviation Limit:		
CAM/PM Option No.:		
Deviation Limit:		
V. Control Device Information		
Control Device ID No.:		
Control Device Type:		

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

Table 1b: CAM/PM Control Device Additions

Emission Unit ID No.	Control Device ID No.	Control Device Type

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

I. Identifying Information		
Account No.:	RN No.:	CN:
Permit No.:	Project No.:	
Area Name:		
Company Name:		
II. Unit/Emission Point/Group/Process Information		
Revision No.:		
Unit/EPN/Group/Process ID No.:		
Applicable Form:		
III. Applicable Regulatory Requirement		
Name:		
SOP/GOP Index No.:		
Pollutant:		
Main Standard:		
Monitoring Type:		
Unit Size:		
Deviation Limit:		
IV. Control Device Information		
Control Device ID No.:		
Device Type:		
V. CAM Case-by-case		
Indicator:		
Minimum Frequency:		
Averaging Period:		
QA/QC Procedures:		
Verification Procedures:		
Representative Date:		
VI. Periodic Monitoring Case-by-case		
Indicator:	Minimum Frequency:	
Averaging Period:		
Periodic Monitoring Text:		

**Texas Commission on Environmental Quality
Monitoring Requirements
Form OP-MON (Page 4)
Federal Operating Permit Program**

Table 1d: CAM/PM Case-By-Case Control Device Additions

Emission Unit ID No.	Control Device ID No.	Control Device Type

Texas Commission on Environmental Quality
Monitoring Requirements
Form OP-MON (Page 5)
Federal Operating Permit Program
Table 2a: CAM/PM Deletions

I. Identifying Information
Account No.: HG-0811-R
RN No.: RN100212828
CN: CN602856155
Permit No.: O1729
Project No.:
Area Name: Transco Railway Product, Inc
Company Name: UTLX Manufacturing
II. Unit/Emission Point/Group/Process Information
Revision No.:
Unit/EPN/Group/Process ID No.: EU-STEAM1 and EU-STEAM2
Applicable Form: OP-REQ3
III. Applicable Regulatory Requirement
Name: Periodic Monitoring - CO Monitoring
SOP/GOP Index No.: R7310
Pollutant: CO
Main Standard: § 117.310(c)(1)
IV. Title V Monitoring Information
Monitoring Type: PM
CAM/PM Option No.:
V. Control Device Information
Control Device ID No.: NA
Control Device Type:
VI. Type of Deletion
Monitoring Requirement: PM
Control Device: BLANK

**Texas Commission on Environmental Quality
Monitoring Requirements
Form OP-MON (Page 6)**

Table 2b: CAM/PM Control Device Deletions

Emission Unit ID No.	Control Device ID No.	Control Device Type

**Texas Commission on Environmental Quality
Monitoring Requirements
Form OP-MON (Page 7)
Federal Operating Permit Program
Table 2c: CAM/PM Case-By-Case Deletions**

I. Identifying Information
Account No.:
RN No.:
CN:
Permit No.:
Project No.:
Area Name:
Company Name:
II. Unit/Emission Point/Group/Process Information
Revision No.:
Unit/EPN/Group/Process ID No.:
Applicable Form:
III. Applicable Regulatory Requirement
Name:
SOP/GOP Index No.:
Pollutant:
Main Standard:
IV. Title V Monitoring Information
Monitoring Type:
V. Control Device Information
Control Device ID No.:
Control Device Type:
VI. Type of Deletion
Monitoring Requirement:
Control Device:

**Texas Commission on Environmental Quality
Monitoring Requirements
Form OP-MON (Page 8)
Federal Operating Permit Program**

Table 2d: CAM/PM Case-By-Case Device Deletions

Emission Unit ID NO.	Control Device ID No.	Control Device Type

Save Form

Reset Form

Application Area-Wide Applicability Determinations and General Information

Form OP-REQ1 (Page 1)

Federal Operating Permit Program

Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
10/02/2025	O1729	RN100212828

For SOP applications, answer ALL questions unless otherwise directed.

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

◆ ons unless otherwise directed.

I. Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and		
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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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		
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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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		
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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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. 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. For GOP applications for GOP 517, if the response to Question IV.A.1 is "Yes," complete Sections IV.C and IV.F. 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. If the response to Question IV.A.3 is "Yes," go to Question IV.G.1. 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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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		
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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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	
Applicability	
1. The application area includes sources, operations, or activities specified in 40 CFR §§ 61.143, 61.144, 61.146, 61.147, 61.148, or 61.155. <i>If the response to Question VII.E.1 is "No," go to Section VII.F.</i>	☐ Yes ☐ No
Roadway Construction	
2. The application area includes roadways constructed or maintained with asbestos tailings or asbestos-containing waste material.	☐ Yes ☐ No
Manufacturing Commercial Asbestos	
3. The application area includes a manufacturing operation using commercial asbestos. <i>If the response to Question VII.E.3 is "No," go to Question VII.E.4.</i>	☐ Yes ☐ No
a. Visible emissions are discharged to outside air from the manufacturing operation	☐ Yes ☐ No
b. An alternative emission control and waste treatment method is being used that has received prior U.S. Environmental Protection Agency (EPA) approval.	☐ Yes ☐ No

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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	
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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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)	
Container Requirements	
15. The application area has containers, as defined in 40 CFR § 61.341, that receive non-exempt benzene waste. <i>If the response to Question VII.H.15 is "No," go to Question VII.H.18.</i>	☐ Yes ☐ No
16. The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers. <i>If the response to Question VII.H.16 is "Yes," go to Question VII.H.18.</i>	☐ Yes ☐ No
17. Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	☐ Yes ☐ No
Individual Drain Systems	
18. The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage non-exempt benzene waste. <i>If the response to Question VII.H.18 is "No," go to Question VII.H.25.</i>	☐ Yes ☐ No
19. The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. <i>If the response to Question VII.H.19 is "Yes," go to Question VII.H.25.</i>	☐ Yes ☐ No
20. The application area has individual drain systems complying with 40 CFR § 61.346(a). <i>If the response to Question VII.H.20 is "No," go to Question VII.H.22.</i>	☐ Yes ☐ No
21. Covers and closed-vent systems used for individual drain systems operate such that the individual drain system is maintained at a pressure less than atmospheric pressure.	☐ Yes ☐ No

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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)	
Process Wastewater Streams (continued)	
24. All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.C.24 is "Yes," go to Question VIII.C.34.</i>	☐ Yes ☐ No
25. The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.C.25 is "No," go to Question VIII.C.27.</i>	☐ Yes ☐ No
26. The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	☐ Yes ☐ No
27. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	☐ Yes ☐ No
28. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.C.27 - VIII.C.28 are both "No," go to Question VIII.C.30.</i>	☐ Yes ☐ No
29. The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	☐ Yes ☐ No
30. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	☐ Yes ☐ No

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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)	
Drains (continued)	
37. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds listed in 40 CFR Part 63 Subpart G, Table 9, at an annual average flow rate greater than or equal to 10 liters per minute.	☐ 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
Gas Streams	
39. The application area includes gas streams meeting the characteristics of 40 CFR § 63.107(b) - (h) or the criteria of 40 CFR § 63.113(i) and are transferred to a control device not owned or operated by the applicant.	☐ 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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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		
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
<i>Containers, Drains, and other Appurtenances</i>		
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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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	
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.
10/02/2025	O1729	RN100212828

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	
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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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		
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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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 YYYYY - National Emission Standards for Hazardous Air Pollutants for Area/Sources: Electric Arc Furnace Steelmaking Facilities	
1. The application area includes an electric arc furnace (EAF) steelmaking facility, and the site is an area source of hazardous air pollutant (HAP) emissions. <i>If the response to Question VIII.DD.1 is "No," go to Section VIII.EE.</i>	☐ 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 BBBB - 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 BBBB, 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 BBBB.	☐ 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.
10/02/2025	O1729	RN100212828

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		
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.
10/02/2025	O1729	RN100212828

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 MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Co		

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

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.
10/02/2025	O1729	RN100212828

For SOP applications, answer ALL questions unless otherwise directed.

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

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

E. PSD Permits and PSD Major Pollutants

Permit No.	Issuance Date	Pollutant(s):	Permit No.	Issuance Date	Pollutant(s):

If PSD Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html.

F. Nonattainment (NA) Permits and NA Major Pollutants

Permit No.	Issuance Date	Pollutant(s):	Permit No.	Issuance Date	Pollutant(s):

If NA Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html.

G. NSR Authorizations with FCAA § 112(g) Requirements

NSR Permit No.	Issuance Date	NSR Permit No.	Issuance Date	NSR Permit No	Issuance Date
5566	04/07/2021				

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.
10/02/2025	O1729	RN100212828

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
5566	04/07/2021				

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

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

PBR No.	Version No./Date	PBR No.	Version No./Date	PBR No.	Version No./Date
106.183	09/04/2000	106.454	11/01/2001		
106.227	03/14/1997	106.472	09/04/2000		
106.261	11/01/2003	106.473	09/04/2000		
106.262	11/01/2003	106.532	09/04/2000		
106.263	11/01/2003				
106.265	09/04/2000				
106.433	09/04/2000				
106.452	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

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

General:

The purpose of this form is to document negative applicability from potentially applicable requirements or to document duplicative, redundant, and or contradicting requirements that have been superseded by a more stringent or equivalent requirement for units, groups, and processes when a permit shield is requested. Negative applicability or superseded requirement determinations when a permit shield is NOT requested may be documented on this form OR the appropriate OP-UA form.

A negative applicability determination is any regulatory citation that provides the basis whereby every operating condition of an emission unit is not subject to a regulation. For example; Title 40 Code of Federal Regulation § 60.110b(a) [40 CFR § 60.110b(a)] could be the regulatory basis for a negative applicability determination for a VOC storage tank of less than 75 cubic meters; therefore, the storage tank is completely exempt from 40 CFR Part 60, Subpart Kb.

Note: Numerous regulatory citations appear to authorize exemptions to qualifying units from those regulations. However, closer examination typically reveals that there are still some requirements which must still be met (such as monitoring and/or recordkeeping).

For certain emission units subject to certain 40 CFR Part 63 standards, other federal regulations may apply. In many instances one of the overlapping regulations may specify which rule supersedes the other. The regulation may state that the owner or operator only has to comply with a specific subpart after the compliance date or it may state that compliance with the subpart is deemed to be in or constitute compliance with other subparts. Although superseded rules do not qualify as negative applicability determinations, it has been determined that these instances can be documented on the Form OP-REQ2, if the applicant elects to comply only with the superseding requirement. For example; a Group 1 or Group 2 Storage Tank, subject to 40 CFR Part 63, Subpart G, may not be required to comply with 40 CFR Part 60, Subpart Kb due to rule overlap of 40 CFR Part 63, Subpart G. In this case, the permit applicant may request a permit shield from 40 CFR Part 60, Subpart Kb. In this case, the applicant must submit the superseding requirement citation, § 63.110(b), and a textual description of the superseding determination, if they elect to comply with only the superseding requirement.

When this form is used for an emission unit which has one or more potential applicable requirements, the applicant must list all the requirements for which negative applicability or superseded requirement determinations can be made. Once the negative applicability or superseded requirement determinations have been made, indicate the citation and reason for the non-applicability or superseded requirement in the appropriate columns. Indicate the determinations for all potentially applicable requirements for each emission unit before listing the next unit.

Negative applicability or superseded requirement determinations for potentially applicable requirements, confirmed by the TCEQ, may be approved as a permit shield (see instructions outlined in Area Wide Applicability Determinations, Form OP-REQ1, to request a permit shield). However, if a permit shield is requested, an OP-REQ2 is always required. For additional information relating to permit shields, refer to the TCEQ guidance document entitled "Permit Shield Guidance (www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/permit_shield.pdf)".

The Company Name and Area Name (from Form OP-1, Section I and X, respectively) must appear in the header block of each page for purposes of identification. The date of submittal must also be included, and should be consistent throughout the application (MM/DD/YYYY). Any subsequent submittals must show the date of revision. Also enter the Regulated Entity Number (RNXXXXXXXX) and Permit Number (OXXXX), if assigned.

Specific:**Unit Action Indicator (AI):**

Only complete this section for the permit revision/renewal. Enter “A” if the entry is a permit addition. Otherwise, enter “D” to indicate a deletion.

Revision No.:

Complete this section only for the permit revision/renewal. Enter the number identified on Form OP-2 (Application for Permit Revision). This number will link the specific negative applicable requirement determination to the appropriate revision.

Unit/Group/Process:**ID NO.:**

Enter the identification number (ID No.) (maximum 10 characters) of the unit, group, or process as listed on Form OP-SUM (Individual Unit Summary).

Applicable Form:

Enter the number of the UA form which contains the specific information for the corresponding emission unit, emission point, or process (i.e., for flares enter “OP-UA7” entitled “Flares”) if the unit/emission point, process has other applicable requirements. If negative applicability determinations are only being substantiated on this form by a textual description of the reason, and the emission unit, emission point, or process has no other positive applicability, enter “OP-REQ2.” The Applicable Form entered on OP-REQ2 must match the applicable form entered on OP-SUM for the emission unit, emission point, or process.

Potentially Applicable Regulatory Name:

Enter the name of the potentially applicable requirement (maximum 25 characters) for which negative applicability or superseded requirement is being demonstrated.

Note: Permit shields cannot be granted for permit authorizations of any kind (i.e. - PSD, NSR permit, Acid Rain, etc.).

Negative Applicability or Superseded Requirement Citation:

Enter the citation of the paragraph of the rule that was used to determine negative applicability or superseded requirements. Provide the citation detail to the level of the paragraph allowing the exemption, exclusion, or non-applicability. If there is more than one citation for determining negative applicability or superseded requirements, select the most appropriate or the clearest (least likely to be misinterpreted). Negative applicability or superseded requirement determinations by the applicant are subject to auditing during the permit application review. The applicant must always indicate the negative applicability or superseded requirement citation on the OP-REQ2. For examples on the level of detail for citations, see table below (maximum 36 characters).

Example Applicable Regulatory Requirements*

Regulation	Name (Input Format)	Citation (Input Format)
30 TAC Chapters 111, 112, 113, 115 and 117	Chapter 111	§ 111.XXX(x)(yy)(zz)
	Chapter 112	§ 112.XXX(x)(yy)(zz)
	Chapter 113	§ 113.XXX(x)(yy)(zz)
	Chapter 115, Storage of VOCs	§ 115.XXX(x)(yy)(zz)
	Chapter 117, ICI	§ 117.XXX(x)(yy)(zz)
40 CFR Part 60, Subparts A-WWW, New Source Performance Standards (NSPS)**	NSPS XXX	§ 60.XXX(x)(yy)(zz)
40 CFR Part 61, Subparts A-FF National Emission Standards for Hazardous Air Pollutants (NESHAP)	NESHAP XX	§ 61.XX(x)(yy)(zz)
40 CFR Part 63, Subparts A-Y+, NESHAP by source category, including hazardous organic NESHAP (HON)	MACT XX	§ 63.XXX(x)(yy)(zz)

* This list is not intended to be exhaustive

** The inclusion of 40 CFR Part 60, Subpart A is only for those requirements contained in 40 CFR § 60.18

Negative Applicability/Superseded Requirement Reason:

Enter a textual description indicating the reason for the negative applicability or superseded requirement determination. If a permit shield is requested, the textual description provided will be recreated as the *Basis of Determination* for the permit shield in the permit. The description may include rule text, rule preamble, or other text resulting from a historical rule interpretation, EPA applicability determination Index (ADI), or case law. Use multiple lines if necessary (maximum 250 characters).

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

Date	Permit No.	Regulated Entity No.
08/15/2025	O1729	RN100212828

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
NA						



Texas Commission on Environmental Quality
Form OP-REQ3 - Instructions
Applicable Requirements Summary

General:

The purpose of Form OP-REQ3 is to allow documentation of the applicability of, or exemption from, requirements for units, groups, and processes and to designate monitoring, recordkeeping, reporting, and testing (MRRT) required for each applicable requirement line (emission limit, standard, equipment specifications, exemption, etc.). The applicant will list units that have at least one applicable requirement. For additional information relating to applicable requirements, please go to the TCEQ web site at www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/additional_fop_guidance.pdf.

Table 1a: Additions

Table 1b: Additions

Table 2a: Deletions

Table 2b: Deletions

Note: Complete Tables 1a and 1b for initial permit issuance or as part of the permit revision process to identify any new requirements.

Note: Complete Tables 2a and 2b for the permit revision process to remove requirements that no longer apply.

Note: If there is only a change to MRRT requirements during a permit revision or update to a permit application, to expedite the process, the change only needs to be reflected on Tables 1b and/or 2b. Tables 1a and/or 2a need not be submitted. Likewise, if there is only a change to a standard during a permit revision or update to a permit application, the change only needs to be reflected on Tables 1a and/or 2a. Tables 1b and/or 2b need not be submitted.

Note: Complete this form for general operating permit (GOP) revisions to establish provisional requirements for authorization to operate when the underlying GOP does not contain the correct citations.

The Company Name and Area Name (from Form OP-1, Section I and X, respectively) must appear in the header block of each page for purposes of identification. The date of submittal must also be included, and should be consistent throughout the application (MM/DD/YYYY). Any subsequent submittals must show the date of revision. Also, enter the Regulated Entity Number (RNXXXXXXXX) and Permit Number (OXXXX), if assigned.

Specific:

Table 1a: Additions and Table 2a: Deletions

Revision No.: Only complete this section for the permit revision process. Enter the revision number identified on Form OP-2 (Application for Permit Revision). This number will link the specific set of applicable requirements to the appropriate permit revision. Please refer to the TCEQ guidance document (Site Operating Permit (SOP) Revision Application Guidance) for additional information regarding the permit revision process.

Unit/Group/Process

ID No.: Enter the identification number (ID No.) for the unit, group, or process (maximum 10 characters) as listed on Form OP-SUM (Individual Unit Summary).

Form OP-REQ3 Instructions

Applicable Form: Enter the number of the Unit Attribute (UA) form which contains the specific information for the corresponding emission unit, emission point, or process (i.e., for flares enter “OP-UA7”). The Applicable Form entered on OP-REQ3 must match the applicable form entered on OP-SUM for the emission unit, emission point, or process.

SOP/GOP Index No.: Site operating permit (SOP) applicants should indicate the SOP index number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP index numbers, please go to the TCEQ web site at www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/additional_fop_guidance.pdf.

General operating permit (GOP) applicants should indicate which provisional requirements are being established if there are no GOP index numbers for the requirements (or checklists for MSW landfill or ACI incinerator).

Pollutant: Select one of the following options for the pollutant that is the subject of the applicable requirement. Enter the code on the form.

For criteria pollutants:

Code	Description
CO	Carbon monoxide
NOX	Nitrogen oxides (NO _x)
VOC	Volatile organic compounds
SO ₂	Sulfur dioxide
PB	Lead
PM	Particulate matter <i>(use this code for any regulatory requirement under any Title 40 Code of Federal Regulations Part 60 [40 CFR Part 60] subpart section or Title 30 Texas Administrative Code Chapter 111 [30 TAC Chapter 111] section where the standard, as designated by the TCEQ Requirements Reference Tables (RRT) and flowchart, is for particulate matter)</i>
PM (OPACITY)	Opacity of particulate matter
HAPS	Hazardous air pollutants (HAPs)

Note: In some rules, there may be requirements for two different pollutants in a single citation. When this occurs, enter the complete citation for the first pollutant, then again on the next line for the second pollutant. Repeat the unit, group, or process identification number on each line. For example; 30 TAC Chapter 117 has several emission limit paragraphs addressing NO_x and CO, or anhydrous ammonia (NH₃). For this example, enter the applicable requirement twice, once for NO_x and once for CO or NH₃.

Applicable Regulatory Requirement

Name: Enter the name of the requirement for which positive applicability is being demonstrated. See examples in the table below (maximum 25 characters).

Standard(s): Enter the citation of the applicable standard(s) of the rule. The RRT and flowcharts may be used to assist with applicability determinations. Multiple lines may be necessary to list all applicable portions of a given rule or requirement (maximum 36 characters).

If the requirement has a future effective date, list the effective date on the form after the citation.

Note: Site-wide requirements should not be listed on Form OP-REQ3. Please refer to the TCEQ guidance documents under “Air Site Operating Permit Guidance (Title V)” for additional information relating to site-wide requirements.

Note: To Title IV acid rain sources; standard(s) for acid rain rules (Title 40 Code of Federal Regulations Parts 72-76 [40 CFR Parts 72-76]) are not required on Form OP-REQ3.

EXAMPLE APPLICABLE REGULATORY REQUIREMENTS*		
Regulation	Name (Input Format)	Standard(s) (Input Format)
30 TAC Chapters 111, 112, 113, 115, 117	Chapter 111	§111.XXX(x)(yy)(zz)
	Chapter 112	§112.XXX(x)(yy)(zz)
	Chapter 113	§113.XXX(x)(yy)(zz)
	Chapter 115	§115.XXX(x)(yy)(zz)
	Chapter 117	§117.XXX(x)(yy)(zz)
40 CFR Part 60, Subparts A-WWW, New Source Performance Standards (NSPS)**	NSPS XXX	§60.XXX(x)(yy)(zz)
40 CFR Part 61, Subparts A-FF National Emission Standards for Hazardous Air Pollutants (NESHAP)	NESHAP XX	§61.XX(x)(yy)(zz)
40 CFR Part 63, Subparts A-XXXXXX, NESHAP by source category, including hazardous organic NESHAP (HON)	MACT XX	§63.XXX(x)(yy)(zz)

* This list is not intended to be exhaustive

** The inclusion of 40 CFR Part 60, Subpart A is only for those requirements contained in 40 CFR § 60.18

When using the RRT and flowchart to complete Form OP-REQ3, citations for standards and MRRT may be grouped to the level at which everything underneath the citation applies. A grouped citation will be shown in the RRT with a bolded notation **[GD]** or **[GR]** before the citation, with no space in between.

For example, 40 CFR § 63.468(a) states, “Each owner or operator of an existing solvent cleaning machine shall submit an initial notification no later than 8/29/95. This report shall include the information specified in paragraphs (a)(1) through (a)(6) of this section.” The reporting column on the RRT will then show “**[GD]** § 63.468(a).”

When entering a citation on Form OP-REQ3 that is shown in the RRT with a bolded notation **[GD]** or **[GR]** before the citation, remove the “D” or “R” from the brackets and show the citation as grouped using the unbolded notation [G]. The reporting citation from the previous example would then be shown as “[G] § 63.468(a)” in the Form OP-REQ3 reporting column.

Table 1b: Additions and Table 2b: Deletions

Revision No.: Only complete this section for the permit revision process. Enter the revision number identified on Form OP-2 (Application for Permit Revision). This number will link the specific set of applicable requirements to the appropriate permit revision. Please refer to the TCEQ guidance document entitled “Site Operating Permit (SOP) Revision Application Guidance” for additional information regarding the permit revision process.

Unit/Group/Process

ID No.: Enter the identification number (ID No.) for the unit, group, or process (maximum 10 characters) as listed on Form OP-SUM (Individual Unit Summary).

SOP/GOP Index No.: Site operating permit (SOP) applicants should indicate the SOP index number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP index numbers, please go to the TCEQ web site at www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/additional_fop_guidance.pdf.

General operating permit (GOP) applicants should indicate which provisional requirements are being established if there are no GOP index numbers for the requirements (or checklists for MSW landfill or ACI incinerator).

Pollutant: Select one of the following options for the pollutant that is the subject of the applicable requirement. Enter the code or pollutant name on the form.

For criteria pollutants:

Code	Description
CO	Carbon monoxide
NOX	Nitrogen oxides (NO _x)
VOC	Volatile organic compounds
SO2	Sulfur dioxide
PB	Lead
PM	Particulate matter <i>(use this code for any regulatory requirement under any 40 CFR Part 60 subpart sections or 30 TAC Chapter 111 sections where the standard, as designated by the RRT and flowchart, is for particulate matter)</i>
PM (OPACITY)	Opacity of particulate matter
HAPS	Hazardous air pollutants (HAPs)

Monitoring and Testing Requirements: Enter the citation of the rule requiring monitoring of the relevant unit against the applicable requirement and/or testing in conjunction with the control standard, emission limit, operations of control equipment, or monitoring equipment of this requirement (maximum 36 characters). Use multiple lines if necessary.

Recordkeeping Requirements: Enter the citation of the rule requiring recordkeeping of the relevant unit against the applicable requirement (maximum 36 characters). Use multiple lines if necessary.

Reporting Requirements: Enter the citation of the rule requiring reporting of the relevant unit against the applicable requirement (maximum 36 characters). Use multiple lines if necessary.

Note: Please refer to the "Standards" section of these instructions for information relating to grouping of monitoring, testing, recordkeeping, and reporting citations.

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

Table 1a: Additions

Date:	Regulated Entity No.:	Permit No.:
Company Name:	Area Name:	

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)

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

Table 1b: Additions

Date:	Regulated Entity No.:	Permit No.:
Company Name:	Area Name:	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements

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

Table 2a: Deletions

Date: 08/15/2025	Regulated Entity No.: RN100212828	Permit No.: O1729
Company Name: UTLX Manufacturing	Area Name: Transco Railway Product, Inc	

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)
	EU-STEAM1		R7310	CO	CO Concentration	§ 117.310(c)(1)
	EU-STEAM2		R7310	CO	CO Concentration	§ 117.310(c)(1)

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

Table 2b: Deletions

Date:	Regulated Entity No.:	Permit No.:
Company Name:	Area Name:	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements

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

General:

This form is used for federal operating permit (FOP) revision and renewal applications only. FOP revision and renewal applications must include Form OP-2 (Application for Permit Revision/Renewal), at a minimum.

As a general procedure, when applying for a FOP revision or renewal, only the changes that are the subject of the revision need to be addressed in this form. For the preconstruction authorization section, only include information for the new or changed preconstruction authorization numbers.

The term “unit” in these instructions have the meaning of “emission unit” as defined in Title 30 Texas Administrative Code Chapter 122 (30 TAC Chapter 122). The term “process” refers to a collection of units or devices that have a physical relationship, or source cap, where a regulatory requirement is potentially applicable to the process as a whole. Additional information on process is discussed on Form OP-SUM. Units and processes must be identified when they are to be added to or removed from the permit, or when they are to be added to or removed from a group.

For information regarding units, groups and processes that must be addressed in an application and information regarding preconstruction authorizations, refer to Form OP-SUM (Individual Unit Summary), the Unit Attribute (UA) forms (which are located at www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html), or the TCEQ guidance document located at [www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title V/additional_fop_guidance.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/additional_fop_guidance.pdf).

The Company Name and Area name (from Form OP-1, Section I and X, respectively) must appear in the header of each page for the purpose of identification. The date of submittal must also be included and should be consistent throughout the application (MM/DD/YYYY). Any subsequent submittals must show the date of revision. Also, enter the Regulated Entity Reference Number (RNXXXXXXXXXX) and (FOP) Permit Number (OXXXX).

Specific:

Table 1

Complete Table 1 if the revision is adding a new emission unit, emission point, or process or deleting an existing emission unit, emission point, or process. Table 2 is not required unless the revision includes an emission unit, emission point, or process being added to or deleted from a group.

Deleting a unit on this form will also serve to delete the unit from a group as well as delete any associated requirements in the Applicable Requirements Summary in the issued permit. These deletions will not need to be represented on Form OP-REQ3 (Applicable Requirements Summary).

Unit/Process

Action Indicator (AI):

Enter “A” if the emission unit, emission point, or process indicated is an addition to the existing permit. Enter “D” if the existing emission unit, emission point, or process indicated is being deleted from the permit. If an emission unit, emission point, or process is not being added/deleted from the permit, leave blank.

Revision No.:

Enter the revision number identified on Form OP-2, Table 2. This number will link the specified change to the appropriate permit revision.

ID No.:

For emission units, processes, or emission points with potentially applicable requirements that are being added to the permit, enter the facility identification numbers (FINs) or emission point numbers (EPNs) as listed in the TCEQ State of Texas Air Reporting System (STARS). If the FIN or EPN currently does not exist in the STARS, then a new identification number (ID No.) that is consistent with the existing numbering system must be provided by the applicant. For existing units, enter the ID No. that is currently identified in the issued federal operating permit.

Note: The ID Nos. listed in the "ID No." column cannot begin with "GRP," the character sequence reserved for group ID Nos.

Applicable Form:

Enter the number of the UA form which contains the specific information regarding the corresponding emission unit, emission point, or process (i.e., for flares, enter OP-UA7 entitled "Flare Attributes"). See www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html for a list of UA forms. Enter the UA Form number if the UA form is used in conjunction with Form OP-REQ2 for negative applicability or if the emission unit, emission point, or process has positive applicability in addition to the negative applicability. Enter "OP-REQ2" if all of the following are true:

1. negative applicability is shown through the use of Form OP-REQ2;
2. no unit attribute information is used to substantiate the negative applicability; and
3. the emission unit, emission point, or process has no positive applicability.

The applicable form entered on Form OP-REQ2 must match the applicable form entered on Form OP-SUMR for the emission unit, emission point, or process.

Name/Description:

For emission units, emission points, or processes being added to the permit, enter a text name or description for the unit from the STARS whenever possible (maximum 50 characters). If no STARS name currently exists, a new name that is consistent with the existing naming convention must be provided by the applicant.

★ **Complete "CAM" only if the revision incorporates requirements for 40 CFR Part 64, Compliance Assurance Monitoring (CAM).**

The following question relating to CAM is for reference only. Certification by the Responsible Official (RO) pursuant to 30 TAC § 22.165 does not extend to the information which is designated on forms as "for reference only."

CAM:

Indicate if the unit is subject to CAM, by placing a "Y" in the box next to the unit. Please refer to 40 CFR Part 64 to determine applicability.

Note: For each new emission unit or emission point, at least one preconstruction authorization must be indicated; however, an emission unit or emission point may have multiple authorizations. Preconstruction authorizations listed on this form should also be identified on Form OP-REQ1.

30 TAC Chapter 116/30 TAC Chapter 106:

List all 30 TAC Chapter 116 or 30 TAC Chapter 106 preconstruction authorizations, including PBR registration numbers, under which the unit or process is operating. Use additional lines to list multiple authorizations.

1. **Permit Number:** Enter the TCEQ NSR permit number(s) (XXXXX), for example, 12345. This includes special permits and standard permit registrations. Do not enter PSD permits and nonattainment permits.
2. **Permit by Rule (previously called Standard Exemption):** For each PBR claimed or registered under 30 TAC Chapter 106, and each standard exemption claimed or registered previously under 30 TAC Chapter 116, enter the number and effective date in the appropriate format shown below.

Note: If units authorized by PBRs are being added or deleted or PBR registration numbers are being added or deleted, these changes must also be identified on Form OP-PBR SUP.

Format

106.XXX/MM/DD/YYYY[rrrr]

XXX/MM/DD/YYYY[rrrr]

Format

PBR/Standard Exemption Claimed or Registered Date

Authorized on or after March 14, 1997 (except 106.181 is on or after December 27, 1996)

Authorized prior to March 14, 1997

XXX = 30 TAC Chapter 116 standard exemption number or 30 TAC Chapter 106 PBR number.

MM/DD/YYYY = Standard exemption or PBR effective date, approval date, or modification completion date.

Information on Chapter 116 version dates is available at

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html.

Information on Chapter 106 version dates is available at

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html.

[rrrr] = Registration number for the authorization. If multiple registration numbers apply, list them separated by commas. Examples: Standard exemptions and PBRs would be reflected in Form OP-SUMR as follows:

Authorization	Std. Ex./PBR No.	Date Authorized	Format
Authorized on or after March 14, 1997	106.473	July 25, 1997	106.473/03/14/1997[1010, 2020]
Authorized prior to March 14, 1997	53	October 20, 1990	53/09/12/1989[1010, 2020]

Please note that prior to March 14, 1997, a standard exemption list was incorporated by reference into 30 TAC Chapter 116, and each standard exemption had an assigned number (e.g., 112). Standard exemptions moved into 30 TAC Chapter 106 on March 14, 1997. Each standard exemption now resides in a section of 30 TAC Chapter 106 (e.g., 30 TAC § 106.148) and is now referred to as a PBR. Information regarding PBRs may be found on the TCEQ website at www.tceq.texas.gov/permitting/air/nav/air_pbr.html.

The applicant has the option of claiming a newer and more stringent version of the standard exemption or PBR if the original applicable version of the standard exemption or PBR cannot easily be determined. As an example of a standard exemption authorized before March 14, 1997, Standard Exemption No. 6 had an effective date of August 30, 1988. It was then amended with a new effective date of July 20, 1992. The standard exemption identifier for a compressor engine constructed in 1993 and registered under Standard Exemption No. 6 would be represented as 6/07/20/1992[rrrr], where [rrrr] is the registration number. As an example of a PBR authorized on or after March 14, 1997, Standard Exemption No. 6 had an effective date of June 7, 1996. It was then amended and moved to 30 TAC § 106.512 with an effective date of March 14, 1997. The PBR identifier for a compressor engine constructed in 1998 and registered under 30 TAC § 106.512 would be represented as 106.512/03/14/1997[rrrr], where [rrrr] is the registration number.

Also, please note that as of August 1, 2020, PBR registration numbers are required to be submitted on this form.

Title I:

List all Title I preconstruction authorization (PSD and nonattainment permits) for which the unit is operating. Use multiple lines to list all authorizations. If no Title I preconstruction authorizations apply to the unit, please leave this field blank.

- Prevention of Significant Deterioration (PSD) Permit:** Enter the PSD permit number (PSDTXXXX), for example, PSDTX123. If the PSD permit has been modified, include the "M" suffix (PSDTXXXXMXX), for example, PSDTX123M5.
- Nonattainment Permit:** Enter each nonattainment permit number (NXXXXX), for example, N123. If the nonattainment permit has been modified, include the "M" suffix (NXXXMXX), for example, N123M5.

Table 2

Complete Table 2 only if an emission unit, emission point, or process is being added to or deleted from a group.

Revision No.:

Enter the revision number identified on Form OP-2, Table 2. This number will link the specified change to the appropriate permit revision.

ID No.:

Enter the identification numbers (ID No.) as listed on Table 1 for the emission units, processes, or emission points. If Table 1 is not required, for emission units, processes, or emission points being added to the permit, enter the FINs or EPNs as listed in the STARS for emission units, processes, or emission points with potentially applicable requirements. If the FIN or EPN currently does not exist in the STARS, then a new ID No. that is consistent with the existing numbering system must be provided by the applicant. For existing units, enter the ID No. that is currently identified in the issued federal operating permit.

Note: The ID Nos. listed in the "ID No." column cannot begin with "GRP," the character sequence reserved for group ID Nos.

Applicable Form:

Enter the number of the UA form which contains the specific information regarding the corresponding emission unit, emission point, or process (i.e., for flares, enter OP-UA7 entitled "Flare Attributes"). See www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html for a list of UA forms. Enter "OP-ACPS," if the unit ID No. is entered on this form, strictly as a result of completing Form OP-ACPS and no UA form is submitted (see Form OP-ACPS instructions for additional guidance). Enter the UA form number if the UA form is used in conjunction with Form OP-REQ2 for negative applicability, or if the emission unit, emission point, or process has positive applicability in addition to the negative applicability. Enter "OP-REQ2" if all of the following are true:

1. negative applicability is shown through the use of Form OP-REQ2;
2. no unit attribute information is used to substantiate the negative applicability; and
3. the emission unit, emission point, or process has no positive applicability.

The applicable form entered on Form OP-REQ2 must match the applicable form entered on form OP-SUMR for the emission unit, emission point, or process.

Group AI:

Enter "A" if the emission unit, emission point, or process identified in the "ID No." column is being added to a group. Enter "D" if the existing emission unit, emission point, or process identified in the "ID No." column is being deleted from a group. If the revision item does not add or delete an emission unit, emission point, or process to or from a group, leave blank.

Group ID No.:

If applicable, enter the unique ID No. for the group (for purposes of completing the unit attribute and applicable requirement forms) in the appropriate format. If the revision item does not add or delete an emission unit, emission point or process to or from a group, leave blank.

Code Format	Description
GRPXXXXXX	Identification number of the group for which the unit is a member
<i>(First three characters must be "GRP")</i>	

Table 3

Complete Table 3 only for Affected Sources that are subject to the following Program(s): Acid Rain, Cross-State Air Pollution Rule (CSAPR), and/or Texas SO₂ Trading Program.

General:

The Acid Rain Program Permit Requirements, as defined in 30 TAC Chapter 122, Subchapter E, require that the Designated Representative (DR) or Alternate Designated Representative (ADR) submit a permit application for each facility (affected source) with an affected unit. A complete permit application is binding on the owners and operators of the affected source and is enforceable in the absence of a permit until the permitting authority either issues a permit to the source or disapproves the application. The responsibilities of the Designated Representative and Alternate Designated Representative of a CSAPR source, as defined in 40 CFR Part 97 (CSAPR NO_x and SO₂ Trading Programs), require that each submission under an applicable CSAPR Trading Program shall be made, signed, and certified by the Designated Representative or Alternate Designated Representative for each CSAPR source and CSAPR unit for which the submission is made.

Any reference in these instructions to the Designated Representative (DR) means the Acid Rain Designated Representative and/or the CSAPR Designated Representative, as applicable. Any reference to the Alternate Designated Representative (ADR) means the Alternate Acid Rain Designated Representative and/or the Alternate CSAPR Designated Representative, as applicable. As reflected in this form, the Acid Rain Designated Representative and the CSAPR Designated Representative for a facility (source) must be the same individual, and the Alternate Acid Rain Designated Representative and the Alternate CSAPR Designated Representative for a facility (source) must be the same individual, if such a facility (source) has units subject to the Acid Rain and CSAPR Programs.

Affected Source Plant Code:

A plant code is a 4 or 5 digit number assigned by the Department of Energy (DOE) Energy Information Administration (EIA) to plants that generate electricity. For older plants, “plant code” is synonymous with “ORISPL” and “facility” codes. If the facility generates electricity but no plant code has been assigned, or if there is uncertainty regarding what the plant code is, send an email to the EIA at EIA-860@eia.gov. For plants that do not produce electricity, use the plant identifier assigned by EPA (beginning with “88”). If the plant does not produce electricity and has not been assigned a plant identifier, contact Laurel DeSantis at desantis.laurel@epa.gov.

Specific:**Unit ID No.:**

Each affected unit must be assigned an identification number (maximum 10 characters). The identification number listed on Table 3 must be the same as the identification number listed on Table 1 of this form for the same unit.

Note: There may be differences between the Unit ID No. on the OP-SUMR and unit names from other sources such as EPA COR, EIA (ORIS), TCEQ SIP lists, etc. However, the Unit ID No. utilized for OP-SUMR, Table 3 must be consistent with those given on the OP-SUMR, Table 1.

Applicable Form:

Enter the number of the applicable UA form used on the first table of the OP-SUMR for the corresponding Unit ID No. If there is no applicable form listed on the first table of the OP-SUMR for the corresponding Unit ID, enter OP-UA1.

COR Unit ID No.:

Enter the unit identification number (maximum 10 characters) that is listed on the EPA Certificate of Representation (COR).

Acid Rain:

Enter YES for an affected unit subject to the Acid Rain Program (ARP). Otherwise, enter NO.

ARP Status:

Select one of the following options that describe the ARP status for that unit. Enter the code on the form.

Code	Description
EU	An existing affected unit with an existing Acid Rain permit
NEW	A new affected unit that does not have an existing Acid Rain permit (Applicant must also submit Form OP-AR1.)
RENEW	An existing affected unit with existing Acid Rain and/or CAIR permits for which the applicant is applying for a renewal (Applicant must also submit Form OP-AR1.)
NEXM	Applying for a new unit exemption under 40 CFR 72.7 (Applicant must also submit required additional information in a separate cover letter.)
REXM	Applying for a retired unit exemption under 40 CFR 72.8 (Applicant must also submit required additional information in a separate cover letter.)
OPT	A unit that is not an affected unit requiring an Acid Rain permit, but applicant is electing to become an affected unit as an "OPT-IN" in the Acid Rain program under 40 CFR Part 74 (Applicant must also submit required additional information in a separate cover letter.)

CSAPR:

Enter "YES," if the unit is subject to the requirements of 40 CFR Part 97, Subpart EEEEE (CSAPR NO_x Ozone Season Group 2 Trading Program). Otherwise, enter "NO."

CSAPR Monitoring:

Select one of the following options that describe the CSAPR NO_x Ozone Season Group 2 monitoring for that unit. Enter the code on the form.

Code	Description
CEMS	A unit that is complying with the CEMS requirements of 40 CFR Part 75, Subpart H for NO _x and heat input.
CEMSD	A gas or oil-fired unit that is complying with the CEMS requirements of 40 CFR Part 75, Subpart H for NO _x , and with the monitoring requirements of 40 CFR Part 75, Appendix D for heat input.
PEAK	A gas or oil-fired peaking unit that is complying with the monitoring requirements of 40 CFR Part 75, Appendix E for NO _x , and with the monitoring requirements of 40 CFR Part 75, Appendix D for heat input.
LME	A gas or oil-fired unit that is complying with the Low Mass Emissions monitoring requirements of 40 CFR § 75.19 for NO _x and heat input.
ALTMON	A unit that is complying with EPA-approved alternative monitoring system requirements of 40 CFR Part 75, Subpart E for NO _x and heat input.
REXM	Applying for a retired unit exemption under 40 CFR Part 97, Subpart EEEEE (CSAPR NO _x Ozone Season Group 2 Trading Program) (Applicant must also submit required additional information in a separate cover letter.)

Texas SO₂:

Enter "YES," if the unit is complying with the requirements of 40 CFR Part 97, Subpart FFFFF (Texas SO₂ Trading Program). Otherwise, enter "NO."

Texas SO₂ Monitoring:

Select one of the following options that describe the Texas SO₂ monitoring for that unit. Enter the code on the form.

Code	Description
CEMS	A unit that is 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.
CEMSD	A gas or oil-fired unit that is complying with the monitoring requirements of 40 CFR Part 75, Appendix D for SO ₂ and heat input.
LME	A gas or oil-fired unit that is complying with the Low Mass Emissions monitoring requirements of 40 CFR § 75.19 for SO ₂ and heat input.

Form OP-SUMR Instructions

ALTMON	A unit that is complying with EPA-approved alternative monitoring system requirements of 40 CFR Part 75, Subpart E for SO ₂ and heat input.
REXM	Applying for a retired unit exemption under 40 CFR Part 97, Subpart FFFFFF (Texas SO ₂ Trading Program) (Applicant must also submit required additional information in a separate cover letter.)

COR:

Enter YES to indicate that the applicant has submitted the COR to the EPA for the Acid Rain and CSAPR programs, as applicable, and has included a copy of the required COR to the TCEQ with this submittal. (Providing the required COR copy to TCEQ authorizes the DR (or ADR) to sign Form OP-CRO1, page 2, to certify Acid Rain and CSAPR program application submittals.)

Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR
[Table 1](#)

Date		Permit No.	Regulated Entity No.
08/15/2025		O1729	RN100212828

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
	The facility is not proposing to add or delete any emission units. The facility is seeking to incorporate changes to most recent NSR permit.						
	Specifically, the facility modified the NSR to reflect current operations - which reduces the NOx PTE to minor source status.						
	The purpose of this application is to 1) incorporate the recent NSR and 2) remove the CO Monitoring requirements in Periodic Monitoring Summary of the Title V Permit.						

Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR
[Table 2](#)

Date	Permit No.	Regulated Entity No.
08/15/2025	O1729	RN100212828

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.
	The facility is not proposing to add or delete any emission units. The facility is seeking to incorporate changes to most recent NSR permit.			
	Specifically, the facility modified the NSR to reflect current operations - which reduces the NOx PTE to minor source status.			
	The purpose of this application is to 1) incorporate the recent NSR and 2) remove the CO Monitoring requirements in Periodic Monitoring Summary of the Title V Permit.			

Form OP-PBRSUP - Instructions
Permits By Rule Supplemental Table
Texas Commission on Environmental Quality

General:

The form is used to provide supplemental information for all Permits by Rule (PBRs) that authorize emission units for a site (or area) subject to the requirements of the Federal Operating Permit (FOP) Program. For emission units identified on Form OP-SUM or Form OP-SUMR, the PBR registration number identified in Section A must also be included on Form OP-SUM or Form OP-SUMR.

The Texas Commission on Environmental Quality (TCEQ) regulated entity reference number (RNXXXXXXXXXX), if assigned, and the application area name from Form OP-1 (Site Information Summary) must appear on the header of each page for purposes of identification for the initial submittal. The date of the initial submittal must also be included and should be consistent throughout the application (MM/DD/YYYY). The date on each table should be revised with any updated submittal provided during the review process. Leave the permit number blank only if the initial form submittal accompanies an initial application. If this form is included as part of the permit renewal or revision process, enter the FOP permit number assigned by the TCEQ, the area name from Form OP-1, the date of the renewal or revision submittal, and the regulated entity reference number. The form OP-PBRSUP should be submitted for any PBR authorization updates with each revision and renewal application.

The TCEQ requires that a Core Data Form be submitted on all incoming applications/registrations unless a regulated entity reference number and customer reference number have been issued by the TCEQ and no core data information has changed. If a regulated entity reference number or customer reference number has been issued, then the number must be noted on the request or applicable form. For more information regarding the Core Data Form, call (512) 239-5175 or go to the TCEQ website at: www.tceq.texas.gov/permitting/central_registry/guidance.html

Specific:

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

Emission units authorized under the following PBRs and any corresponding historical (pre-March 1997) SEs are required to be listed in sections A, B, and D:

PBR No.	Name or Subject	PBR No.	Name or Subject
106.124	Pilot Plants	106.373	Refrigeration Systems
106.142	Rock Crushers	106.374	Lime Slaking
106.144	Bulk Mineral Handling	106.375	Aqueous Electrolytic
106.145	Bulk Sand Handling	106.376	Decorative Chrome Plating
106.146	Soil Stabilization Plants	106.392	Thermoset Resin
106.147	Asphalt Concrete Plants	106.393	Convey/Storage Plastic/Rubber
106.150	Asphalt Silos	106.395	Plastic/Rubber Mix (No Solvent)
106.181	Used Oil Combustion Units	106.396	Plastic Rubber Mix (Solvent)
106.182	Ceramic Kilns	106.411	Steam or Dry Cleaning Equipment
106.183	Boilers, Heaters, and Other Combustion Units	106.412	Fuel Dispensing
106.221	Extrusion Presses	106.416	Uranium Recovery

PBR No.	Name or Subject	PBR No.	Name or Subject
106.223	Sawmills	106.417	Ethylene Oxide Sterilizers
106.224	Aerospace	106.418	Printing Presses
106.225	Semiconductor	106.419	Photographic Process Equipment
106.226	Coating Manufacturing	106.433	Surface Coat
106.227	Soldering, Brazing, Welding	106.434	Powder Coating Facility
106.231	Wood Products	106.435	Classic or Antique Auto Restoration Facility
106.245	Ethyl Alcohol Facilities	106.436	Auto Body Refinishing
106.261	Facility; Emission Limits	106.452	Dry Abrasive Cleaning
106.262	Facility; Emission/Distance	106.454	Degreasing
106.263	Repairs and Maintenance	106.472	Organic/Inorganic Liquid Loading and Unloading
106.264	Replacements of Facilities	106.473	Organic Liquid Loading and Unloading
106.265	Hand-Held/Manually Operated Machines	106.474	Hydrochloric Acid Storage
106.281	Feed Milling	106.475	Pressure Tank or Vent to Firebox
106.283	Grain Handling	106.476	Pressure Tank or Vent to Control
106.311	Crucible or Pot Furnace	106.477	Anhydrous NH ₃ Storage
106.314	Shell Core and Mold Machines	106.478	Storage Tank and Change Service
106.315	Sand or Investment Molds	106.491	Dual Chamber Incinerators
106.320	Miscellaneous Metallic Treatment	106.492	Flares
106.321	Metal Melting and Holding Furnace	106.493	Direct Flame Incinerators
106.322	Furnace to Reclaim Aluminum or Copper	106.494	Pathological Waste Incinerators
106.332	Chlorine Repackaging	106.495	Heat Cleaning Devices
106.351	Salt Water Disposal	106.496	Air Curtain Incinerators
106.352	Oil and Gas Production	106.511	Portable and Emergency Engines and Turbines

PBR No.	Name or Subject	PBR No.	Name or Subject
106.353	Temporary Oil and Gas Facilities	106.512	Stationary Engines and Turbines
106.354	Iron Sponge Gas-Treating Unit	106.513	Natural Gas-Fired Combined Heat and Power Units
106.355	Pipeline Metering, Purging, and Maintenance	106.532	Water/Wastewater Treatment
106.359	Planned Maintenance, Startup, and Shutdown (MSS) at Oil and Gas Handling and Production Facilities	106.533	Water and Soil Remediation
106.371	Cooling Water Units	106.534	Municipal Solid Waste Landfills and Transfer Stations

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

This section provides all PBR authorized emission units for the application area that require registration with the TCEQ.

Unit ID No.:

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.

Registration No.:

Enter the registration number provided by TCEQ upon authorization.

PBR No.:

For PBRs (Standard Exemption) authorized before March 14, 1997, enter the selected PBR (Standard Exemption) number, in the space provided (XXX). For PBRs authorized on or after March 14, 1997, enter the selected PBR section number, in the space provided (106.XXX).

Registration Date:

Enter the date (MM/DD/YYYY) the authorization was issued to the site. This is the date of the PBR authorization letter.

B. Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for the Application Area

This section provides all PBR authorized emission units for the application area that are claimed (and not registered).

Unit ID No.:

Enter the identification number (ID No.) for the emission unit authorized by the PBR (maximum 10 characters). If listed on Form OP-SUM (Individual Unit Summary), the ID No. should match.

PBR No.:

For PBRs (Standard Exemption) authorized before March 14, 1997, enter the selected PBR (Standard Exemption) number, in the space provided (XXX). For PBRs authorized on or after March 14, 1997, enter the selected PBR section number, in the space provided (106.XXX).

Version No./Date:

For a PBR (Standard Exemption) authorized before March 14, 1997, enter the effective date of the PBR (Standard Exemption) under which the PBR was authorized. For a PBR authorized on or after March 14, 1997, enter the effective date of 30 TAC Chapter 106 under which the PBR was authorized. The 30 TAC Chapter 106 effective date can be found in the section of the PBR (MM/DD/YYYY).

C. Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for Insignificant Sources for the Application Area

This section provides all PBR authorizations for the application area that are not identified in the table above and are considered insignificant sources.

PBR No.:

For PBRs (Standard Exemption) authorized before March 14, 1997, enter the selected PBR (Standard Exemption) number, in the space provided (XXX). For PBRs authorized on or after March 14, 1997, enter the selected PBR section number, in the space provided (106.XXX).

Version No./Date:

For a PBR (Standard Exemption) authorized before March 14, 1997, enter the effective date of the PBR (Standard Exemption) under which the PBR was authorized. For a PBR authorized on or after March 14, 1997, enter the effective date of 30 TAC Chapter 106 under which the PBR was authorized. The 30 TAC Chapter 106 effective date can be found in the section of the PBR (MM/DD/YYYY).

D. Monitoring Requirements for registered and claimed PBRs for the Application Area

This section provides the monitoring and/or recordkeeping requirements sufficient to demonstrate compliance for the registered and claimed PBRs identified in sections A and B.

Unit ID No.:

Enter the identification number (ID No.) for the emission unit authorized by the PBR (maximum 10 characters). If listed on Form OP-SUM (Individual Unit Summary), the ID No. should match.

PBR No.:

For PBRs (Standard Exemption) authorized before March 14, 1997, enter the selected PBR (Standard Exemption) number, in the space provided (XXX). For PBRs authorized on or after March 14, 1997, enter the selected PBR section number, in the space provided (106.XXX).

Version No./Date:

For a PBR (Standard Exemption) authorized before March 14, 1997, enter the effective date of the PBR (Standard Exemption) under which the PBR was authorized. For a PBR authorized on or after March 14, 1997, enter the effective date of 30 TAC Chapter 106 under which the PBR was authorized. The 30 TAC Chapter 106 effective date can be found in the section of the PBR (MM/DD/YYYY).

Monitoring Requirement:

Provide the monitoring and/or recordkeeping requirements used to demonstrate compliance with the applicable PBR conditions, general requirements of 30 TAC §106.4 or general requirements (if any) in effect at the time of the claim, and any certified registration of emission limits as applicable for the emission units. The specificity of the monitoring and/or recordkeeping requirements is required to be consistent with the [Periodic Monitoring Guidance](#) and include the following:

- Identify one or more indicators of emission control performance for the control device, or the parameter to be monitored if a control device is not utilized. Indicators may include, but are not limited to, direct or predicted emissions (including visible emissions or opacity), control device parameters, process parameters which are correlated to an emission rate through performance testing or AP-42 emission factors, or recorded finding of inspection and maintenance activities conducted by the owner or operator.
- Identify the frequency of conducting the monitoring. The monitoring frequencies should be consistent with the minimum monitoring frequency found in the applicable PM guidance document. For example, control device parameters may be monitored once per week.
- If applicable, identify the period over which discrete data points will be averaged.

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

Date		Permit Number	Regulated Entity Number
08/15/2025		O1729	RN100212828

Unit ID No.	Registration No.	PBR No.	Registration Date
Plasma Cutting / Burning Tables - Plar	123148	106.261/262	
Plasma Cutting / Burning Tables - Plar	122154	106.261/262	
Isofoaming Insulation Operations	127290	106.262	
Aerosol Can Activities	139981	106.433	
Paint Line Fugitive Component Repair		106.261/262	
Tank Car Priming Booth		106.433	
Jacket Coating		106.433	

Permit By Rule Supplemental Table (Page 4)

08/15/2025

Normalizing Furnace

Texas Commission on Environmental Quality

Title V Existing

1729

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	TRANSCO RAILWAY PRODUCTS
County	HARRIS
Latitude (N) (##.#####)	29.8675
Longitude (W) (-###.#####)	95.143055
Primary SIC Code	4789
Secondary SIC Code	
Primary NAICS Code	488210
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN100212828
What is the name of the Regulated Entity (RE)?	TRANSCO RAILWAY PRODUCTS
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	16923 OLD BEAUMONT HWY 90
City	HOUSTON
State	TX
ZIP	77049
County	HARRIS
Latitude (N) (##.#####)	29.865
Longitude (W) (-###.#####)	-95.118055
Facility NAICS Code	
What is the primary business of this entity?	MANUFACTURING OF RAIL ROAD TANK CAR

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN600126395
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Union Tank Car Company
Texas SOS Filing Number	5623506
Federal Tax ID	361034688
State Franchise Tax ID	13631046888
State Sales Tax ID	
Local Tax ID	
DUNS Number	5161112
Number of Employees	101-250
Independently Owned and Operated?	No

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	UNION TANK CAR COMPANY
Prefix	MR
First	TYLER
Middle	
Last	MOORE
Suffix	
Credentials	
Title	DIRECTOR OF OPERATIONS
Enter new address or copy one from list:	RE Physical Address
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	16923 BEAUMONT HWY
Routing (such as Mail Code, Dept., or Attn:)	
City	HOUSTON
State	TX
ZIP	77049
Phone (###-###-####)	3364708640
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	tyler.moore@transcorailway.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.	New Contact
Organization Name	UTLX
Prefix	MR
First	Brandon
Middle	
Last	Howard
Suffix	
Credentials	
Title	Environmental Manager
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	16923 BEAUMONT HWY
Routing (such as Mail Code, Dept., or Attn:)	
City	HOUSTON
State	TX
ZIP	77049
Phone (###-###-####)	9047080372

Extension

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

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

E-mail

brandon.howard@marmonrail.com

Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

29 Deg 52 Min 3 Sec

3) Permit Longitude Coordinate:

95 Deg 8 Min 35 Sec

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

Update

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

1729-39139

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

No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

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

Attach OP-ACPS (Application Compliance Plan and Schedule)

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

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

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

Attach OP-CRO2 (Change of Responsible Official Information)

[File Properties]

File Name

OP_CRO2_Roberto Part 1.pdf

Hash

4E77B0710E933E9394D2820785E4092971B86E6913D15559A1E22E98D0CF4B62

MIME-Type

application/pdf

[File Properties]

File Name

OP_CRO2_Roberto Part

2.pdf

Hash	722D7738674E312BC79A8B381A4377811064897242185ABBDBE0E96C4B1FC4D5
MIME-Type	application/pdf
[File Properties]	
File Name	OP_CRO2_Roberto Part 3.pdf
Hash	E0EEB0F02EE55ED297F2C3D6E996D5271BE84D528DDE45E5B4AB2060B4C770B1
MIME-Type	application/pdf

Attach OP-DEL (Delegation of Responsible Official)

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

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

Certification

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

1. I am Brandon Howard, the owner of the STEERS account ER036320.
2. I have the authority to sign this data on behalf of the applicant named above.
3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
8. I am knowingly and intentionally signing Title V Existing 1729.
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: Brandon Howard OWNER OPERATOR

Account Number:	ER036320
Signature IP Address:	73.166.30.69
Signature Date:	2025-10-13
Signature Hash:	E12B0422D7A832514A0AE7360203A23216D9A72D035DFD2EF9F2D6A9C5841D5C
Form Hash Code at time of Signature:	C3CE452CE68ABEE7E5CCAF53057E435E8E9D013C253F09726A562931D26E2486

Submission

Reference Number:	The application reference number is 825641
Submitted by:	The application was submitted by ER036320/Brandon Howard
Submitted Timestamp:	The application was submitted on 2025-10-13 at 16:40:17 CDT

Submitted From:

The application was submitted from IP address
73.166.30.69

Confirmation Number:

The confirmation number is 684783

Steers Version:

The STEERS version is 6.93

Permit Number:

The permit number is 1729

Additional Information

Application Creator: This account was created by Brandon Howard



TCEQ Core Data Form

For detailed instructions on completing this form, please read the Core Data Form Instructions or call 512-239-5175.

SECTION I: General Information

1. Reason for Submission (If other is checked please describe in space provided.)		
☐ New Permit, Registration or Authorization (Core Data Form should be submitted with the program application.)		
☐ Renewal (Core Data Form should be submitted with the renewal form)	☒ Other Update to P2 Program for Executive Summary	
2. Customer Reference Number (if issued)	Follow this link to search for CN or RN numbers in Central Registry**	3. Regulated Entity Reference Number (if issued)
CN 600126395		RN 100212828

SECTION II: Customer Information

4. General Customer Information		5. Effective Date for Customer Information Updates (mm/dd/yyyy)			
☐ New Customer ☐ Update to Customer Information ☐ Change in Regulated Entity Ownership ☐ Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts)					
The Customer Name submitted here may be updated automatically based on what is current and active with the Texas Secretary of State (SOS) or Texas Comptroller of Public Accounts (CPA).					
6. Customer Legal Name (If an individual, print last name first: eg: Doe, John)				<i>If new Customer, enter previous Customer below:</i>	
Union Tank Car Company					
7. TX SOS/CPA Filing Number		8. TX State Tax ID (11 digits)		9. Federal Tax ID (9 digits)	
0005623506		13631046888		36-3104688	
				10. DUNS Number (if applicable) 00-516-1112	
11. Type of Customer:		☒ Corporation		☐ Individual	
Government: ☐ City ☐ County ☐ Federal ☐ Local ☐ State ☐ Other		☐ Sole Proprietorship		Partnership: ☐ General ☐ Limited	
12. Number of Employees				13. Independently Owned and Operated?	
☐ 0-20 ☐ 21-100 ☒ 101-250 ☐ 251-500 ☐ 501 and higher				☐ Yes ☒ No	
14. Customer Role (Proposed or Actual) – as it relates to the Regulated Entity listed on this form. Please check one of the following					
☒ Owner ☐ Operator ☐ Owner & Operator ☐ Other: ☐ Occupational Licensee ☐ Responsible Party ☐ VCP/BSA Applicant					
15. Mailing Address:		16923 Beaumont Highway			
City		Houston		State TX	
ZIP		77049		ZIP + 4 1050	
16. Country Mailing Information (if outside USA)				17. E-Mail Address (if applicable)	

18. Telephone Number	19. Extension or Code	20. Fax Number (if applicable)
(281) 847-8200		(281) 591-3001

SECTION III: Regulated Entity Information

21. General Regulated Entity Information (If 'New Regulated Entity' is selected, a new permit application is also required.)								
☐ New Regulated Entity ☐ Update to Regulated Entity Name ☒ Update to Regulated Entity Information								
<i>The Regulated Entity Name submitted may be updated, in order to meet TCEQ Core Data Standards (removal of organizational endings such as Inc, LP, or LLC).</i>								
22. Regulated Entity Name (Enter name of the site where the regulated action is taking place.)								
Transco Railway Products, Inc.								
23. Street Address of the Regulated Entity: (No PO Boxes)	16923 Beaumont Highway							
	City	Houston	State	TX	ZIP	77049	ZIP + 4	1050
24. County	Harris							

If no Street Address is provided, fields 25-28 are required.

25. Description to Physical Location:								
26. Nearest City					State	Nearest ZIP Code		
Houston					TX	77049		
<i>Latitude/Longitude are required and may be added/updated to meet TCEQ Core Data Standards. (Geocoding of the Physical Address may be used to supply coordinates where none have been provided or to gain accuracy).</i>								
27. Latitude (N) In Decimal:						28. Longitude (W) In Decimal:		
Degrees	Minutes		Seconds		Degrees	Minutes		Seconds
29	51		54		095	07		05
29. Primary SIC Code (4 digits)	30. Secondary SIC Code (4 digits)		31. Primary NAICS Code (5 or 6 digits)			32. Secondary NAICS Code (5 or 6 digits)		
4789			488210					
33. What is the Primary Business of this entity? (Do not repeat the SIC or NAICS description.)								
Cleaning & repairing railcars								
34. Mailing Address:	16923 Beaumont Highway							
	City	Houston	State	TX	ZIP	77049	ZIP + 4	1050
35. E-Mail Address:	roberto.sanchez@transcorailway.com							
36. Telephone Number	37. Extension or Code				38. Fax Number (if applicable)			
(281) 847-8200					(281) 591-3001			

39. TCEQ Programs and ID Numbers Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form. See the Core Data Form instructions for additional guidance.

☐ Dam Safety	☐ Districts	☐ Edwards Aquifer	☒ Emissions Inventory Air	☒ Industrial Hazardous Waste
			HG0811R	82082
☒ Municipal Solid Waste	☒ New Source Review Air	☐ OSSF	☐ Petroleum Storage Tank	☒ PWS
TXD000274456	5566			TX1011189, TX1013015
☐ Sludge	☐ Storm Water	☒ Title V Air	☐ Tires	☐ Used Oil
		01729		
☐ Voluntary Cleanup	☐ Wastewater	☐ Wastewater Agriculture	☐ Water Rights	☒ Other:
				P2 No. P01587

SECTION IV: Preparer Information

40. Name:	Brandon Howard		41. Title:	Environmental Manager
42. Telephone Number	43. Ext./Code	44. Fax Number	45. E-Mail Address	
(904) 708-0372		() -	brandon.howard@marmonrail.com	

SECTION V: Authorized Signature

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 6 and/or as required for the updates to the ID numbers identified in field 39.

Company:	Transco Railway Products, Inc.		Job Title:	Plant Manager	
Name (In Print):	Roberto Sanchez			Phone:	(281) 536- 3231
Signature:				Date:	

39. TCEQ Programs and ID Numbers Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form. See the Core Data Form instructions for additional guidance.

☐ Dam Safety	☐ Districts	☐ Edwards Aquifer	☒ Emissions Inventory Air	☒ Industrial Hazardous Waste
			HG0811R	82082
☒ Municipal Solid Waste	☒ New Source Review Air	☐ OSSF	☐ Petroleum Storage Tank	☒ PWS
TXD000274456	5566			TX1011189, TX1013015
☐ Sludge	☐ Storm Water	☒ Title V Air	☐ Tires	☐ Used Oil
		01729		
☐ Voluntary Cleanup	☐ Wastewater	☐ Wastewater Agriculture	☐ Water Rights	☒ Other:
				P2 No. P01587

SECTION IV: Preparer Information

40. Name:	Brandon Howard		41. Title:	Environmental Manager
42. Telephone Number	43. Ext./Code	44. Fax Number	45. E-Mail Address	
(904) 708-0372		() -	brandon.howard@marmonrail.com	

SECTION V: Authorized Signature

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 6 and/or as required for the updates to the ID numbers identified in field 39.

Company:	Transco Railway Products, Inc.		Job Title:	Plant Manager	
Name (In Print):	Roberto Sanchez			Phone:	(281) 536- 3231
Signature:				Date:	10-13-2025

October 13, 2025

Texas Commission on Environmental Quality
Air Permits Division
Mail Code 163
P.O. Box 13087
Austin, Texas 78711-3087

Re: Change of Responsible Official for Transco Railway Inc., Sheldon, Texas, 16923
Beaumont HWY 90, Harris County, Sheldon, TX 77049: Federal Operating Permit (FOP) No.
O1729

Dear Sir or Madam,

Enclosed is the OP-CRO2 form and an updated Core Date form as required to change the Responsible Official for Transco Railway Inc. located in Sheldon, Texas. October 13, 2025, Roberto Sanchez, Shop Manager, was appointed the Responsible Official for Transco Railway Inc - Sheldon.

Please contact me with any questions at Brandon.howard@marmonrail.com or -904-708-0372

Cordially,



Brandon Howard

Environmental Manager

Cc: TCEQ, Region 12, Houston Regional Office, Air Permits Division, 5425 Polk Avenue,
Suite H,
Houston, Tx. 77023-1452 w/attachments
P. Janis



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

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

I. IDENTIFYING INFORMATION		
A. Account No.: HG0811R	B. RN: 100212828	C. CN: 600126395
D. Permit No.: O1729	E. Area Name: Transco Railway Products	
F. Company Name: Transco Railway Products		
II. CHANGE TYPES		
A. Action Type: New Appointment: ☒ Administrative Information Change: ☐		
B. Contact Type (<i>only one response can be accepted per form</i>)		
Responsible Official: ☒ Designated Representative: ☐ Alternate Designated Representative: ☐		
III. RESPONSIBLE OFFICIAL/DESIGNATED REPRESENTATIVE/ALTERNATE DESIGNATED REPRESENTATIVE INFORMATION		
A. Name: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.) Roberto Snachez		
B. Title: Plant Manager	C. Appointment Effective Date: 10/13/2025	
D. Telephone: (281) 536-3231	E. Fax:	
F. Company Name: Transco Railway Products, Inc.		
G. Mailing Address: 16923 Beaumont Hwy 90		
City: Sheldon	State: TX	Zip Code: 77049
H. Delivery Address: 16923 Beaumont Hwy 90		
City: Sheldon	State: TX	Zip Code: 77049
IV. CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS		
This certification does not extend to information which is designated by the TCEQ as information for reference only.		
I, <u>Roberto Sanchez</u> , certify that, based on information and belief formed after reasonable inquiry, the		
(Name printed or typed)		
statements and information stated above are true, accurate, and complete.		
Signature: <u></u>		Signature Date: <u>10-13-2025</u>
Title: <u>Plant Manager</u>		



TCEQ Core Data Form

For detailed instructions on completing this form, please read the Core Data Form Instructions or call 512-239-5175.

SECTION I: General Information

1. Reason for Submission (If other is checked please describe in space provided.)		
☐ New Permit, Registration or Authorization (Core Data Form should be submitted with the program application.)		
☐ Renewal (Core Data Form should be submitted with the renewal form)		☒ Other Update to P2 Program for Executive Summary
2. Customer Reference Number (if issued)	Follow this link to search for CN or RN numbers in Central Registry**	3. Regulated Entity Reference Number (if issued)
CN 600126395		RN 100212828

SECTION II: Customer Information

4. General Customer Information		5. Effective Date for Customer Information Updates (mm/dd/yyyy)	
☐ New Customer ☐ Update to Customer Information ☐ Change in Regulated Entity Ownership			
☐ Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts)			
<i>The Customer Name submitted here may be updated automatically based on what is current and active with the Texas Secretary of State (SOS) or Texas Comptroller of Public Accounts (CPA).</i>			
6. Customer Legal Name (If an individual, print last name first: eg: Doe, John)		If new Customer, enter previous Customer below:	
Union Tank Car Company			
7. TX SOS/CPA Filing Number	8. TX State Tax ID (11 digits)	9. Federal Tax ID (9 digits)	10. DUNS Number (if applicable)
0005623506	13631046888	36-3104688	00-516-1112
11. Type of Customer:	☒ Corporation	☐ Individual	Partnership: ☐ General ☐ Limited
Government: ☐ City ☐ County ☐ Federal ☐ Local ☐ State ☐ Other	☐ Sole Proprietorship		☐ Other:
12. Number of Employees		13. Independently Owned and Operated?	
☐ 0-20 ☐ 21-100 ☒ 101-250 ☐ 251-500 ☐ 501 and higher		☐ Yes ☒ No	
14. Customer Role (Proposed or Actual) – as it relates to the Regulated Entity listed on this form. Please check one of the following			
☒ Owner ☐ Operator ☐ Owner & Operator ☐ Other:			
☐ Occupational Licensee ☐ Responsible Party ☐ VCP/BSA Applicant			
15. Mailing Address:	16923 Beaumont Highway		
	City	Houston	State TX ZIP 77049 ZIP + 4 1050
16. Country Mailing Information (if outside USA)		17. E-Mail Address (if applicable)	

From: [TVAPPS](#)
To: [Rosa Mora-Nichols](#)
Subject: FW: STEERS Title V Application Submittal (Update)
Date: Tuesday, October 14, 2025 8:55:40 AM

Good Morning Rosa,

An update has been received for one of your applications.

Regards,

Liam Lin (x1278)
Permit Reviewer – Title V

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

From: steers@tceq.texas.gov <steers@tceq.texas.gov>
Sent: Monday, October 13, 2025 4:40 PM
To: TVAPPS <tvapps@tceq.texas.gov>
Subject: STEERS Title V Application Submittal (Update)

The TV-E application has been successfully submitted by TYLER MOORE. The submittal was received at 10/13/2025 04:40 PM.

The Reference number for this submittal is 825641

The confirmation number for this submittal is 684783.

The Area ID for this submittal is 1729.

The Project ID for this submittal is 39139.

The hash code for this submittal is

C3CE452CE68ABEE7E5CCAF53057E435E8E9D013C253F09726A562931D26E2486.

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

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

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

I. Identifying Information
Account Number: HG0811R
Regulated Entity Number: RN100212828
Customer Reference Number: CN600126395
Permit Number: O1729
Area Name: Transco Railway Products
Company Name: Transco Railway Products
II. Duly Authorized Representative Information
Action Type: ☒ New DAR Identification ☐ Administrative Information Change
Conventional Title: ☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.
Name (Driver License/STEERS): Brandon Howard
Title: Environmental Manager
Delegation Effective Date: 10/16/2025
Telephone Number: 904-708-0372
Fax Number:
Company Name: Transco Railway Products
Mailing Address: 16923 Beaumont Hwy 90
City: Houston
State: Texas
ZIP Code: 77049
Email Address: brandon.howard@marmonrail.com

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

III. Certification of Truth, Accuracy, and Completeness

I, Roberto Sanchez

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

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

Responsible Official Signature: Roberto Sanchez

Date: 10-16-2025

Duly Authorized Representative Signature: Brandon Howard

(Name(s) printed or typed) Brandon Howard

Date: 10-16-2025

IV. Removal of Duly Authorized Representative(s)

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

(Name(s) printed or typed) _____

Effective Date: _____

Responsible Official Signature: _____

Date: _____

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

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

I. Identifying Information
Account No.: HG0811R
Regulated Entity Number: RN10021828
Customer Reference Number: CN600126395
Permit Number: O1729
Area Name: Transco Railway Products
Company: Transco Railway Products
II. Change Type
Action Type: ☒ New Appointment ☐ Administrative Information Change
Contact Type (only one response accepted per form): ☒ Responsible Official ☐ Designated Representative (<i>Acid Rain Program and/or CSAPR sources only</i>) ☐ Alternate Designated Representative (<i>Acid Rain Program and/or CSAPR sources only</i>)

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

III. Responsible Official/Designated Representative/Alternate Designated Representative Information
Conventional Title:
☒ Mr.
☐ Mrs.
☐ Ms.
☐ Dr.
Name (Driver's License/STEERS): Roberto Sanchez
Title: Plant Manager
Appointment Effective Date: 10/16/2025
Telephone Number: (281)536-3231
Fax Number.:
Company Name: Transco Railway Products
Mailing Address: 16923 Beaumont Hwy 90
City: Houston
State: Texas
ZIP Code: 7709
Email Address: roberto.sanchez@transcorailway.com

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

IV. Certification of Truth, Accuracy, and Completeness

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

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

Signature: *Roberto Sanchez*

Signature Date: 10-16-2025

From: [Brandon Howard](#)
To: [Rosa Mora-Nichols](#)
Subject: Re: Updated OP-CRO2 form and OP-DEL form, Needed for Title V - Project 39139, Permit 1729, Union Tank Car
Date: Thursday, October 16, 2025 4:49:15 PM
Attachments: [image001.png](#)
[20251016165013140.pdf](#)

Rosa,

Here is an updated copy of the documents requested. Sorry for the inconvenience

Brandon

Get [Outlook for iOS](#)

From: Rosa Mora-Nichols <rosa.mora-nichols@tceq.texas.gov>
Sent: Thursday, October 16, 2025 2:12:28 PM
To: Brandon Howard <brandon.howard@marmonrail.com>
Subject: FW: Updated OP-CRO2 form and OP-DEL form, Needed for Title V - Project 39139, Permit 1729, Union Tank Car

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Mr. Howard,

The attached forms are TCEQ's most current/revised versions. Please use these.

Thank you,
Rosa Mora-Nichols

From: Rosa Mora-Nichols <rosa.mora-nichols@tceq.texas.gov>
Sent: Thursday, October 16, 2025 1:44 PM
To: Brandon Howard <brandon.howard@marmonrail.com>
Subject: Updated OP-CRO2 form and OP-DEL form, Needed for Title V - Project 39139, Permit 1729, Union Tank Car
Importance: High

Good afternoon, Mr. Howard,

Per our phone conversation, today.

We have received your application for the above referenced facility, and it is currently under review. The following item(s) are required before we can declare the application administratively complete:

Please promptly provide the following:

- An updated OP-CRO2 form for Mr. Robert Sanchez, an outdated form version was provided, a newer CRO2 form is needed; it has other information that needs to be provided including his email address. It also seems like his name was misspelled on this form that was submitted.
- An OP-DEL form is needed with Mr. Robert Sanchez and Brandon Howard signatures. The one provided with Tyler Moore is not acceptable because that pertained to the previous application that was dated 09/30/2025, that had the wrong Permit Number 4839. Since you resubmitted the application on 10/10/2025, with the existing Permit 1729, a current or updated OP-DEL form is needed that is signed and dated on or after that date. It needs to be signed by Mr. Sanchez and Mr. Howard.

Please promptly email this information directly to me, **by no later than COB, today, Thursday, 10/16/2025**, so we may declare this application administratively complete

Best,

Rosa Mora-Nichols

License and Permit Specialist

Texas Commission on Environmental Quality

Office of Air - Air Permits Division

(512) 239-2071



How are we doing? www.tceq.texas.gov/customersurvey