

Rule Interpretation Memos for 30 TAC 115 , Vent Gas Control

- ! [Determination of applicability for §115.126\(a\)\(2\) and \(b\)\(2\) when complying with §115.126\(a\)\(3\) and \(b\)\(3\) -Retired](#) [May 11, 2001]
- ! [Revision - Determination of applicability for Vent Gas Control rules during compressor depressurization](#) [June 10, 2003]
- ! [Revision - Definition of process vent as it relates to Vent Gas Control rules](#) [August 1, 2003]
" [Attachment - Memorandum from Mr. Jung, Legal Division to Ms Henneke, Houston Region \(Jan. 20, 1993\)](#) [August 1, 2003]
- ! [Determination of applicability for water separators to Vent Gas Control rules](#) [October 10, 1996]
- ! [Revision - Determination of applicability for a glycol dehydrator reboiler which burns liquid fuel and routes its emissions back to its firebox](#) [October 7, 2003]
- ! [Determination of the applicability to Vent Gas Control rules for process air vented to polymer storage silos vents-Revision](#) [June 2, 2003]
- ! [Revision - Applicability of Vent Gas Control Rules to pipeline pigging activities](#) [September 22, 2003]
- ! [Applicability of process vent streams that qualify for exemption under 115.127\(a\)\(2\)](#) [July 7, 1998]
- ! [Revision - Applicability of the Storage of VOC and Vent Gas Control requirements of 30 TAC Chapter 115 to process vessels.](#) [June 26, 2003]
- ! [Applicability of 115.127\(a\)\(7\) to a catalytic partial oxidation unit.](#) [June 10, 2003]
- ! [Revision - Applicability of 30 Chapter 115 Underground Storage Caverns \(USC\) and brine ponds](#) [June 10, 2003]
- ! [Applicability of Chapter 115 to fugitive emissions collected and vented directly to the atmosphere.](#) [June 26, 2003]

Last Modified: October 7, 2003

Retired as a result of amendments to Chapter 115 adopted on 12/6/2000 (Rule Log No. 2000-011i-115-AI; effective date 1/18/2001

Air Rule Interpretation Summary Form

Code Number	R5-121.002
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Determination of applicability for Vent Gas Control rules during compressor depressurization.	June 10, 2003
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Rule/Regulation Citation(s):	Federal Rule: <input type="checkbox"/> State Regulation: <input checked="" type="checkbox"/>
	Description:
30 TAC Chapter 115, § 115.121-129	Subchapter B: General Volatile Organic Compound Sources Division 2: Vent Gas Control
Interpretation Request:	
Whether the “depressurization of a compressor” would trigger the application of Title 30 Texas Administrative Code (TAC), 115.121-115.129, relating to Vent Gas Control.	
Determination:	
If depressurization of a compressor is a scheduled maintenance, startup, or shutdown activity, and is conducted in accordance with 30 TAC § 101.211 and § 101.222, the depressurization would be exempt from §§ 115.121 - 115.129. When necessary, the facility is required to notify the appropriate Texas Commission on Environmental Quality regional office and local air pollution control agencies.	

Bibliography:

30 TAC Chapter 101 (2002). [Sept. 12, 2002]

30 TAC Chapter 115 (2003). [Jan. 17, 2003]

Air RIT Rule Interpretation/Opinion Code #: R5-121.002

Please note, in the event that an external customer feels that this rule interpretation is in error or a source of information has been overlooked which would change the determination, a request for reconsideration may be submitted. Requests must be submitted on a Reconsideration Process Form which is available at the TCEQ's homepage: <http://www.tnrc.state.tx.us/permitting/airperm/opd/rimhmpg.htm>, or from any of the air rule interpretation team members.

Air Rule Interpretation Summary Form

Code Number	R5-121.003
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Revision - Definition of process vent as it relates to Vent Gas Control Rules	August 1, 2003
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Rule/Regulation Citation(s):	Federal Rule: <input type="checkbox"/> State Regulation: <input checked="" type="checkbox"/>
	Description:
30 TAC Chapter 115, §§ 115.121-129	Subchapter B: General Volatile Organic Compound Sources Division 2: Vent Gas Control
Interpretation Request:	
Clarify the definition of a volatile organic compound (VOC) process vent for use in determining the applicability of Title 30 Texas Administrative Code (TAC) §§ 115.121-115.129, relating Subchapter B: Division 2 - Vent Gas Control. What differentiates a “process vent” from the more general term “vent?”	
Determination:	
If a vent originates from or is associated with an operation that can be defined as a process, then it is a “process vent.” Examples of process vents in the oil and gas industry would include any vent originating from or associated with oil/gas processing or treatment equipment. This could include, but is not limited to, vent streams from glycol dehydrators, wastewater treatment equipment, or any other equipment containing VOCs such as crude oil or natural gas with non-methane, non-ethane components.	

Note: This determination was originally issued in 1996. In 2003, it was reissued as Rule Interpretation Code Number R5-121.003 with citation updates and minimal non-substantive changes. The 2003 revision does not include any substantive or technical changes.

Bibliography:

30 TAC Chapter 101 (2003). [Jan. 17, 2003]

30 TAC Chapter 115 (2003). [Jan. 17, 2003]

[Memorandum from Mr. Kevin R. Jung, Legal Division, to Ms. Jodena Henneke, Regional Director - Houston \(1993\). \[Jan 20, 1993\].](#)

Air RIT Rule Interpretation/Opinion Code #: R5-121.003

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Air RIT Rule Interpretation/Opinion Code #: R5-121.003

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TEXAS AIR CONTROL BOARD
 AUSTIN M E M O R A N D U M TEXAS

TO: Ms. Jodena Henneke, Regional Director, Houston
 FROM: Kevin R. Jung, Staff Attorney, Legal Division KRJ BZ
3
 DATE: January 20, 1993
 SUBJECT: Method for determining Regulation V exemption status of vent gas streams pursuant to Rule 115.127

This memorandum is being written in response to questions raised in a letter dated October 2, 1992, from Mr. Jim Myers, P.E., Houston Branch Manager for Jones and Neuse, Inc., to Mr. James Braddock, General Counsel, Texas Air Control Board (TACB). The letter requests a formal agency opinion regarding the method for determining the exemption status of certain vent gas streams pursuant to TACB Rule 115.127. The letter states that the TACB Region 7 Staff has directed several companies to sample for air contaminants upstream of any equipment that may remove air contaminants for purposes of determining the applicability of the exemption. The letter suggests that this instruction conflicts with the definition of "vent" in Board Rule 115.010.

The term "vent," is defined in Board Rule 115.010 to mean "any duct, stack, chimney, flue, conduit, or other device used to conduct air contaminants into the atmosphere." This term would include any avenue within a process stream that is used ultimately to conduct air contaminants to the atmosphere, whether the device is located before or after any control equipment in the process stream. Thus, the term "vent," when used in the phrase "vent gas stream," as in Board Rule 115.127, could be interpreted to mean a vent gas stream after the point of generation of air contaminants but before any control equipment.

If the interpretation of the Rule suggested in Mr. Myers' letter were to be applied by the TACB, it would defeat the purpose of the Rule, which was to require sources to implement Reasonably Available Control Technology (RACT) if the uncontrolled emissions from such sources exceeded the emissions limitations found in Regulation V. If the TACB were to allow the regulated community to utilize controlled emission rates to determine the applicability of the exemption in Board Rule 115.127, it would enable industries to install the minimum amount of control technology necessary to meet the Regulation V exemption limitations. Thus, instead of RACT, companies could install "JECT"--Just Enough Control Technology to avoid having to install RACT. This would result in far less emission reductions in nonattainment areas, undermining TACB efforts to bring those areas into attainment status.

Air contaminants become air contaminants at the point of generation (or the "source" as defined in Section 382.003(12) of the Texas Clean Air Act), not at the point of emission to the ambient atmosphere. Therefore, only uncontrolled emission rates have been used in the past by the TACB Staff to determine whether an increase in emissions had taken place for purposes of Regulation VI permitting requirements concerning the implementation of Best Available Control Technology (BACT) (See 7/18/73 memo from Charles R. Barden, P.E., Executive Secretary, TACB). Since uncontrolled emissions are used for an existing facility's "baseline" in such analysis under Regulation

DATE: January 20, 1993

SUBJECT: Method for determining Regulation V exemption status of vent gas streams pursuant to Rule 115.127
Page 2

VI, absent a clearly expressed contrary intent, it is appropriate to use uncontrolled emissions to establish an existing facility's "baseline" for purposes of the rule in question. The concept of implementing "Just Enough Control Technology" is equally unacceptable in both cases.

Additionally, Mr. Myers' letter states that "many such vents are 'grandfathered' and pre-date the permit requirements and some vents pre-date the agency itself." This point is irrelevant for purposes of the vent gas rule, which by its terms addresses all existing sources for the purpose of requiring such sources to implement RACT, regardless of their permitted status, if uncontrolled emissions exceeded the emissions limitations found in Regulation V. In support of this, the hearing record pertaining to the latest adoption of the vent gas rule addresses one commenter's suggestion that new or modified facilities that have gone through the TACB permitting process be exempted from Regulation V, by noting that:

Regulation V and ozone control strategies involve retrofit controls based on technological advances and reduction requirements which may go beyond requirements that exist at the time a permit was issued (see Texas Air Control Board Public Hearing Record, August 15, 16, and 17, 1989, Regulation V Evaluation and Recommendation, page 11).

It is clear from the hearing record that the intent of Regulation V was that it be applied to all sources. It should also be noted that if the rule sought to treat some sources as being grandfathered, the rule would have had to define the scope of such a grandfathering provision, which it does not. The intent of Rule 115.127 to address all existing sources is consistent with the intent of Regulation V generally.

Accordingly, it is the opinion of the Legal Division that sampling for air contaminants for purposes of determining the applicability of the exemption be conducted upstream of any control equipment, and that Rule 115.127 applies to grandfathered facilities as well as those facilities which were previously permitted.

cc: Mr. James D. Braddock, Director, Legal Division

RECEIVED
MAY 20 1993

AIR QUALITY PLANNING
TEXAS AIR CONTROL BOARD



October 2, 1992

Mr. James Braddock, General Counsel
Texas Air Control Board
12124 Park 35 Circle
Austin, Texas 78753

RECEIVED

OCT 05 1992

LEGAL
DIVISION

Dear Mr. Braddock:

I hereby request a formal agency opinion regarding the method to determine the Regulation V exemption status of certain vent gas streams pursuant to Rule 115.127. Various industrial facilities in the Houston area have been instructed by the TACB Region 7 staff that sampling the atmospheric exhaust of such vents is not sufficient to determine the exemption status of vent gas streams under Regulation V. According to the TACB Houston staff, sampling must occur upstream of any equipment that may remove air contaminants from the stream prior to being vented to the atmosphere. This appears to fly in the face of the definition of "vent" in Rule 115.010.

The streams in question are routed through condensers, scrubbers, absorbers and separators prior to being vented to the atmosphere. It should be pointed out that many such vents are "grandfathered" and pre-date the permit requirements and some vents pre-date the agency itself. Many companies have been operating for over twenty years with the understanding that the vent gas streams from their processes are exempt from Regulation V control based on the vent flow and composition as it exhausts to the atmosphere which is consistent with the TACB definition of "vent". If this is an incorrect conclusion and the TACB wishes to implement an interpretation consistent with the Houston Region 7 staff position, the rule-making process is the appropriate mechanism to insure proper notification and involvement of potentially affected facilities.

Your expeditious response on this important issue will be appreciated. If you have any questions, please call me at (713) 450-1882.

Sincerely,

Jim Myers, P.E.
Houston Branch Manager

JM/bb

cc: Ms Jodena Henneke

Rule Interpretation Summary Form

REQUEST:

Rule/Regulation Citation(s):	Federal Rule: <input type="checkbox"/> State Regulation: <input checked="" type="checkbox"/>
30 TAC 115	Description: Vent Gas Control
Interpretation Request:	
Determination of whether a vent on a volatile organic compound (VOC) water separator should be considered a VOC process vent for purposes of determining applicability of Title 30 Texas Administrative Code, Chapter 115 (30 TAC 115).	

DETERMINATION:

Summary of Request:
The Operating Permits Division requested clarification/opinion on the applicability of the Vent Gas Control Rule, under 30 TAC 115 to control emissions from VOC water separators used exclusively in conjunction with the production of crude oil or condensate in accordance with §§115.137(b)(1) and (c)(1), in near nonattainment and attainment counties, identified in §§115.137(b) and (c).
Determination:
After review by the Rule Interpretation Team, the team concurred with the following determination made by the Engineering Services Section: Emissions from VOC water separators are subject to the Water Separation rules stated in 30 TAC 115.131 - 139. If a VOC water separator is exempted from the Water Separation rules, it is not subject to the Vent Gas Control rules stated in 30 TAC §115.121 - 129.

Air Rule Interpretation Summary Form

Code Number	R2-9.002 R5-121.005
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Revision - Determination of applicability for a glycol dehydrator reboiler which burns liquid fuel and routes its emissions back to its firebox.	October 7, 2003
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Rule/Regulation Citation(s):	Federal Rule: <input type="checkbox"/> State Regulation: <input checked="" type="checkbox"/>
30 TAC Chapter 112, § 112.9	Subchapter A: Control of Sulphur Dioxide
30 TAC Chapter 115, §§ 115.121-129	Subchapter B: General Volatile Organic Compound Sources Division 2: Vent Gas Control
Interpretation Request:	
Would a glycol dehydrator reboiler which combusts liquid fuel and routes its still vent emissions (which contain volatile organic compounds [VOCs] [Benzene, Toluene, Ethyl Benzene and Xylene, etc.]) back to its firebox be considered both a control device for purposes of meeting the Title 30 Texas Administrative Code (TAC) Chapter 115 Vent Gas Control requirements (§§ 115.121-129) and a process heater subject to sulfur dioxide (SO ₂) requirements contained in 30 TAC Chapter 112 (specifically § 112.9)?	
Determination:	
The glycol dehydrator reboiler which uses its still vent emissions along with liquid fuel to fire its firebox is considered both a process heater and a control device. Therefore, the specified glycol dehydrator reboiler is subject to the requirements of 30 TAC § 112.9 (Allowable Emission Rates--Combustion of Liquid Fuel) and §§ 115.121-129 (Vent Gas Control). Also note that any facility that is subject to the SO ₂ limits of Chapter 112 shall comply with the requirements of 30 TAC § 112.2 (Compliance, Reporting, and Recordkeeping).	

Note: This determination was originally issued in 1996 as R2-1.004/R5-121.005. In 2003, it was reissued as Rule Interpretation Code Number R2-9.002/R5-121.005 with substantive and technical changes.

Bibliography:

30 TAC Chapter 101 (2002). [Sep. 12, 2002]

Air RIT Rule Interpretation/Opinion Code #: R2-9.002/R5-121.005

Please note, in the event that an external customer feels that this rule interpretation is in error or a source of information has been overlooked which would change the determination, a request for reconsideration may be submitted. Requests must be submitted on a Reconsideration Process Form which is available at the TCEQ's homepage: <http://www.tnrc.state.tx.us/permitting/airperm/opd/rimhmpg.htm>, or from any of the air rule interpretation team members.

30 TAC Chapter 112 (1997). [July 16, 1997]

30 TAC Chapter 115 (2003). [Jan. 17, 2003]

Rule Interpretation Code Number R5-121.003 (August 1, 2003).

Air RIT Rule Interpretation/Opinion Code #: R2-9.002/R5-121.005

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Air Rule Interpretation Summary Form

Code Number	R5-121.006
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Determination of applicability to Vent Gas Control rules for process air vented to polymer storage silos vents. - Revision	June 2, 2003
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Rule/Regulation Citation(s):	Federal Rule: <input type="checkbox"/>	State Regulation: <input checked="" type="checkbox"/>
30 TAC Chapter 115, §§ 115.121-129	Description: Control of Air Pollution from Volatile Organic Compounds Subchapter B: Vent Gas Control	

Interpretation Request:

Determination of the applicability of Title 30 Texas Administrative Code (TAC) §§ 115.121-129 to polymer product storage silos that have vents exhausting product conveying air.

Question 1: Do the Vent Gas Control rules under §§ 115.121-129 apply to polymer storage silos that have vents exhausting air that contains volatile organic compound (VOC) emissions which were generated from one or more of the manufacturing processes?

Question 2: If applicable, has any ruling been made that in any way exempts polymer storage silos from § 115.121 Vent Gas Control requirements other than § 115.127(a)(3) exemptions?

Determination:

Response to Question 1: Storage silo vents that exhaust VOC emissions that originate from the manufacturing process are considered to be “process vents.” Therefore, storage silo vents which are determined to be process vents are subject to the Vent Gas Control rules (§§ 115.121-129).

Response to Question 2: No additional rulings or interpretations have been made that exempt polymer storage silos from the control requirements of § 115.121, other than the exemptions listed in § 115.127.

Note: This interpretation is case-specific for the process stated. An additional interpretation will be required if the process description varies. The process in question has air being introduced into the manufacturing process. This same air then continues with the manufactured product through the remaining process steps. As the air proceeds through the process, VOC emissions are also introduced into the air from the process. When the product reaches the storage silos for storage, the air and the VOC emissions from the process are exhausted out the silo vents.

Bibliography:

30 TAC Chapter 101 (2002). [Sept. 12, 2002]

30 TAC Chapter 115 (2003). [Jan. 17, 2003]

Interpretation/Opinion, Code Number R5-121.003

Air RIT Rule Interpretation/Opinion Code #: R5-121.006

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Under Revision as of October 10, 2003

Rule Interpretation Summary Form

REQUEST:

Rule/Regulation Citation(s):	Federal Rule: <u> </u> State Regulation: <u> X </u> Description:
30 TAC Chapter 115 §§ 115.121.129	Control of Air Pollution from Volatile Organic Compounds Subchapter B: Vent Gas Control
Interpretation Request:	
Would the exemptions stated in Title 30 Texas Administrative Code § 115.127(a) [30 TAC § 115.127(a)] apply to a single gas stream before mixing with other source streams or would they apply to the combined stream prior to release through the vent?	

DETERMINATION:

Determination:
Compliance with the exemptions contained in 30 TAC § 115.127 should be made after the combination of the source streams, but prior to the combined stream entering the control device (if there is a control device present).

Bibliography:

Title 30 TAC Chapter 115, Effective date December 23, 1997

Texas Health and Safety Code, Subtitle C, Air Quality, Revised May 12, 1992

Evaluation of Testimony for past Public Hearing Records

January 20, 1993 letter from Mr. James Braddock, General Counsel, TNRCC to Mr. Jim Myers, Houston Branch Manager, Jones and Neuse, Inc.

Air Rule Interpretation Summary Form

Code Number	R5-112.008 R5-121.010
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Applicability of the Storage of VOC and Vent Control Requirements of 30 TAC Chapter 115 to process vessels.	June 26, 2003
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Rule/Regulation Citation(s):	Federal Rule: <u> </u>	State Regulation: <u> X </u>
	Description:	
30 TAC Chapter 115, §§ 115.112-119 §§ 115.121-129	Subchapter B: General Volatile Organic Compound Sources Division 1: Storage of Volatile Organic Compounds Division 2: Vent Gas Control	
Interpretation Request:		
Title 30 Texas Administrative Code (TAC) Chapter 115 contains one set of volatile organic compounds (VOC) control requirements for process vents and another set of requirements for storage vessels. Many vessels used in industrial facilities are designed and/or utilized for process operations or for a combination of process and storage operations. This rule interpretation is being requested to clarify the difference between storage vessels and process vessels.		
Determination:		
A determination of the applicability of 30 TAC Chapter 115 should be based on the primary function of the vessel at a given time. In general, if there is a fairly constant flow into and out of the vessel and the flow in roughly equals the flow out, the vessel should be considered a process vessel subject to the Vent Gas Control requirements of 30 TAC §§ 115.121-123, 115.125-127, and 115.129 and not a storage vessel.		

Bibliography:

Texas Department of Health interoffice memorandum from Mr. Sam Crowther to Pete Roberts/Art Kellogg (July 30, 1973).

Texas Department of Health interoffice memorandum from Mr. Sam Crowther to Mr. Jim Hutchinson (Aug. 17, 1973).

TNRCC interoffice memorandum from Mr. Bertie Fernando, Engineering Services Section, to Ms. Jeanne Philquist, Compliance Section (May 24, 1994).

40 CFR § 63.101 (1997). [July 1, 1997].

40 CFR § 280.12 (1998). [July 1, 1998].

40 CFR § 60.111b (1998). [July 1, 1998].

30 TAC Chapter 115 (2003). [Jan. 17, 2003].

30 TAC Chapter 101 (2002). [Sept. 12, 2002].

TNRCC Air Permits Division, Federal Operating Permit Application Guidance Document (Feb. 1999).

Interpretation/Opinion, Code Number R5-131.003/R5-112.006.

EPA Applicability Determination Index for NSPS Subpart Kb, Control Number 0000017.

Air RIT Rule Interpretation/Opinion Code #: R5-112.008/R5-121.010

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Air Rule Interpretation Summary Form

Code Number	R01-1.004 R5-121.013
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Applicability of 115.127(a)(7) to a catalytic partial oxidation unit.	June 10, 2003
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Rule/Regulation Citation(s):	Federal Rule: <input type="checkbox"/> State Regulation: <input checked="" type="checkbox"/>
30 TAC Chapter 101, § 101.1	General Air Quality Rules Subchapter A: Definitions
30 TAC Chapter 115, § 115.127(a)(7)	Subchapter B General Volatile Organic Compound Sources Division 2: Vent Gas Control
Interpretation Request:	
Does a catalytic partial oxidation (CPO) unit, which is not a conventional gas-fired combustion unit, qualify for the exemption for combustion units contained in Title 30 Texas Administrative Code (TAC) § 115.127(a)(7)?	
Determination:	
The CPO unit is a catalytic reactor which uses natural gas as a feed stock for the manufacture of a synthesis gas product. The natural gas is used as a reactant, not as a fuel, so the CPO unit is not a combustion unit and does not qualify for the exemption contained in § 115.127(a)(7).	

Bibliography:

Title 30 TAC Chapter 101 (2002). [September 12, 2002]

Title 30 TAC Chapter 115 (2003). [Jan. 17, 2003]

21 TexReg 1533 (1996). [Feb. 14, 1996]

Air RIT Rule Interpretation/Opinion Code #: R01-1.004/R5-121.013

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Air Rule Interpretation Summary Form

Code Number	R5-112.007 R5-121.008
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Applicability of 30 Chapter 115 to Underground Storage Caverns (USC) and brine ponds.	June 10, 2003
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Rule/Regulation Citation(s):	Federal Rule: <input type="checkbox"/> State Regulation: <input checked="" type="checkbox"/>
	Description:
30 TAC Chapter 115 §§ 115.112-119 §§ 115.121-129	Subchapter B: General Volatile Organic Compound Sources Division 1: Storage of Volatile Organic Compounds Division 2: Vent Gas Control
Interpretation Request:	
Determination of applicability of Title 30 Texas Administrative Code (TAC) Chapter 115 to underground storage caverns (USC), brine ponds, and associated transfer equipment in petroleum storage service.	
Determination:	
<p>USCs USCs are considered to be reservoirs and are subject to the volatile organic compounds storage (VOC) rules in §§ 115.112-119. However, USCs which maintain working pressure sufficient at all times to prevent any vapor or gas loss to the atmosphere are only subject to the control requirements of either § 115.112(a)(1), (b)(1), (c)(1), or (c)(3).</p> <p>Brine Ponds Associated w/USCs Brine ponds are considered reservoirs under Chapter 115 and are subject to the VOC storage rules in §§ 115.112-119. However, exemptions found in § 115.117 for low vapor pressure VOCs may apply because the brine is primarily water and contains only small quantities of VOCs.</p> <p>USC/Brine Pond Transfer Equipment The open-end of the transfer pipe is considered to be a “process vent” and is therefore subject to the vent gas control rules in §§ 115.121-129. Please note that the exemption stated in § 115.127(a)(6) cannot be applicable to the transfer pipe because the pipe is considered to be a separate source (from a USC and a brine pond); and because no other rules under Chapter 115 apply to the transfer piping, the piping is only subject to the vent gas control rules in Chapter 115. However, exemptions as stated in § 115.127 for a vent gas stream with a low VOC concentration may apply.</p>	

Bibliography:

30 TAC Chapter 101 (2002). [Sept. 12, 2002]

30 TAC Chapter 115 (2003). [Jan. 17, 2003]

Air Rule Interpretation Summary Form

Code Number	R5-121.012 R5-352.004
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Applicability of Chapter 115 to fugitive emissions collected and vented directly to the atmosphere.	June 26, 2003
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Rule/Regulation Citation(s):	Federal Rule: <input type="checkbox"/> State Regulation: <input checked="" type="checkbox"/>
30 TAC Chapter 115, § 115.121	Description: Subchapter B General Volatile Organic Compound Sources Division 2: Vent Gas Control
30 TAC Chapter 115, § 115.352	Description: Subchapter D Petroleum Refining, Natural Gas Processing, and Petrochemical Processes Division 3: Fugitive Emissions Control in Petroleum Refining, Natural Gas/Gasoline Processing, and Petrochemical Processes in Ozone Nonattainment Areas

Interpretation Request:

Fugitive emissions from compressor seals are collected and routed to a header that vents directly to the atmosphere. Are the volatile organic compound (VOC) emissions from the header vent subject to the vent gas control requirements of Title 30 Texas Administrative Code (TAC) §§ 115.120 - 115.129 or the fugitive emission requirements of § 115.352 - 115.359?

Determination:

Compressor seal VOC emissions which are contained (meaning, no fugitive emissions are emitted at the component) and routed to a header that vents directly to the atmosphere are subject to the vent gas control requirements of §§ 115.120 - 115.129. However, note that a component which has a non-enclosed collection system (such as a hood) may be more appropriately subject to the §§ 115.352 - 115.359 fugitive emission requirements. Therefore, more information may need to be submitted for a component which has a non-enclosed collection system for a case-by-case evaluation.

Bibliography:

30 TAC Chapter 101 (2002). [Sept. 12, 2002]

30 TAC Chapter 115 (2003). [Jan. 17, 2003]

21 Tex. Reg. 1548 - 1569 (1996). [Feb. 27, 1996]

Air RIT Rule Interpretation/Opinion Code #: R5-121.012/R5-352.004

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