

## Rule Interpretation Memos for 30 TAC 115, Fugitive Emissions Control in Petroleum Refining and Petrochemical Processes

- ! [Revision - Applicability of §§115.352 - 115.359 to boiler fuel lines, feed lines, etc., at a SOCOMI/petrochemical facility.](#) [June 18, 2003]
- ! [Revision - Determination of applicability of Chapter 115 rules to bulk terminals located next to NGP plants](#) [September 5, 2003]
- ! [Applicability of Chapter 115 to fugitive emissions collected and vented directly to the atmosphere.](#) [June26, 2003]

Last Modified: September 5, 2003

## Air Rule Interpretation Summary Form

Code Number	R5-352.002
-------------	------------

Applicability of §§ 115.352 - 115.359 to boiler fuel lines, feed lines, etc., at a SOCFMI/chemical facility.	June 18, 2003
--	---------------

Rule/Regulation Citation(s):	Federal Rule: <u>  </u> State Regulation: <u>  X  </u>
30 TAC Chapter 115, §§ 115.352 -115.357, and 115.359	Description: Subchapter D: Petroleum Refining, Natural Gas Processing, and Petrochemical Processes; Division 3: Fugitive Emission Control in Petroleum Refining, Natural Gas/Gasoline Processing, and Petrochemical Processes in Ozone Nonattainment Areas.
Interpretation Request:	
An external customer requested a determination if boiler fuel lines, loading/unloading lines, and feed lines at a synthetic organic chemical manufacturing industry (SOCMI)/chemical facility are considered part of the process and subject to 30 Texas Administrative Code (TAC) §§ 115.352 - 115.357 and 115.359 fugitive emission control requirements.	
Determination:	
Boiler fuel lines, loading/unloading lines, and feed lines at a SOCFMI/chemical facility are considered to be part of the manufacturing process and are thereby subject to the fugitive emission control requirements stated in §§ 115.352 - 115.357 and 115.359. However, please note that there are exemptions which might exempt the fuel lines, loading/unloading lines, and feed lines from the requirements of this division. As an example, § 115.357(6) exempts components at a SOCFMI/chemical facility which contact a process fluid containing less than 10.0% of volatile organic compound by weight from the requirements of this division.	

**Bibliography:**

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

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

*Texas Natural Resource Conservation Commission (TNRCC) Interoffice Memorandum*, Dated Oct. 11, 1993, from: Troy Dalton to all TNRCC Regions.

Texas Air Control Board (TACB) Public Hearings June 29-30, 1988, Regulation V Revisions.

TACB Public Hearings Aug. 15, 16, & 17, 1989, Regulation V, Public Notification and Testimony.

TACB Public Hearings Mar. 4-5, 1991, Regulation V.

TACB Public Hearings Feb. 24 & 26, 1992, Regulation V and General Rules.

TACB Public Hearings Aug. 4-6, 1993, Regulation V and State Implementation Plan.

TNRCC Public Hearing Dec. 13, 1996, 30 TAC Chapter 115 and State Implementation Plan.

Air RIT Rule Interpretation/Opinion Code #: R5-352.002

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.tnrcc.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	R5-352.003
-------------	------------

Determination of applicability of Chapter 115 rules to bulk terminals located next to NGP plants	September 5, 2003
--	-------------------

Rule/Regulation Citation(s):	Federal Rule: <input type="checkbox"/> State Regulation: <input checked="" type="checkbox"/>
	Description:
30 TAC Chapter 115, §§ 115.352-357 and 359	Subchapter D: Petroleum Refining, Natural Gas Processing, and Petrochemical Processes Division 3: Fugitive Emission Control in Petroleum Refining, Natural Gas/ Gasoline Processing, and Petrochemical Processes in Ozone Nonattainment Areas
Interpretation Request:	
Determination of applicability of Title 30 Texas Administrative Code (TAC) §§ 115.352-357 and 359 (Fugitive Monitoring Requirements at Petroleum Refining, Natural Gas/Gasoline Processing, and Petrochemical Processes in Ozone Nonattainment Areas) to bulk terminals which store and distribute natural gas or fractionate natural gas liquids, and are located next to natural gas processing operations.	
Determination:	
Because the bulk terminal facility is under common control or ownership and is located next to or near the natural gas processing facility, the two facilities are considered to be the same <i>property</i> (as defined in § 101.1) and are thus subject to the requirements of §§ 115.352-357 and 359. However, by the definition of a natural gas/gasoline processing facility, only the following sources at the bulk terminal facility would be considered to be subject to §§ 115.352-357 and 359: compressor stations; dehydration units; sweetening units; field treatment; underground storage; liquified natural gas units; and field gas gathering systems.	

**Note:** This determination was originally issued in 1997. In 2003, it was reissued as Rule Interpretation Code Number R5-352.003 with citation updates and minimal non-substantive changes. The 2003 revision does not include any substantive or technical changes.

Bibliography:

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

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

Air RIT Rule Interpretation/Opinion Code #: R5-352.003

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	R5-121.012 R5-352.004
-------------	--------------------------

Applicability of Chapter 115 to fugitive emissions collected and vented directly to the atmosphere.	June 26, 2003
---	---------------

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

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.