

Major NSR Summary Table - Instructions For Major NSR Permits and PAL Permits Texas Commission on Environmental Quality

General:

The TCEQ implements the periodic monitoring (PM) requirements of 30 TAC § 122.142(c) and compliance assurance monitoring (CAM) requirements of 30 TAC § 122.142(g) for New Source Review (NSR) permits through the NSR permit project review process to determine the appropriate monitoring associated with the NSR permit, including the Maximum Allowable Emission Rates Table (MAERT), and specifying those monitoring requirements in the NSR permit or permit record. In order to resolve the United States Environmental Protection Agency's (EPA's) objection to incorporation by reference (IBR) of major NSR and Plant-Wide Applicability Limit (PAL) permits in Title V site operating permits (SOPs), every major NSR and PAL permit (and the associated minor permit that is consolidated with the major or PAL permit) held at the site or application area and the major NSR summary table for each major NSR and PAL permit, must be appended to the SOP. The purpose of the Major NSR Summary Table is to identify monitoring, recordkeeping, reporting, and testing (MRRT) requirements that have been determined to be sufficient to demonstrate compliance with the emission limits for each emission point as reflected on the MAERT. The Major NSR Summary Table follows the format of the MAERT found in the major NSR or PAL permit, with three additional columns: Monitoring and Testing Requirements, Recordkeeping Requirements, and Reporting Requirements.

Specific:

Instructions for adding or revising a Major NSR Summary Table in an SOP.

Adding a New Major NSR Summary Table to the SOP

A Major NSR Summary Table is required to be added to an SOP after issuance of a major NSR or PAL permit. An application must be submitted consistent with the requirements for submitting an initial, significant revision, or renewal for either a major NSR or PAL permit, or a minor revision for a PAL permit (30TAC 122 Subchapter B, Division 3; Subchapter C, Division 2; or Subchapter C, Division 4).

Application Guidance and Procedures:

- Indicate in the application cover letter that the Major NSR Summary Table is being added to the SOP in this permit action.
- The assigned permit reviewer will send the Major NSR Summary Table, created from the MAERT with MRRT columns added, via electronic mail.
- Complete the MRRT columns per instructions below.
- Send the completed Major NSR Summary Table Word document to the assigned permit reviewer via electronic mail for review.

Revising an Existing Major NSR Summary Table

An existing Major NSR Summary Table must be revised when the Major NSR or PAL permit MAERT is updated through an NSR permit action and may need to be revised when any special conditions of the major NSR or PAL permit are revised through an NSR permit action.

An existing Major NSR Summary Table may be revised by submitting a minor revision application provided that the NSR action being incorporated satisfies the requirements for a minor revision under 30 TAC § 122.215; and may also be revised by submitting a renewal or significant revision application.

Application Guidance and Procedures:

- Indicate in the application cover letter that the Major NSR Summary Table is being revised in this permit action.

Major NSR Summary Table – Instructions

- The assigned permit reviewer will send the Major NSR Summary Table Word document from the effective permit in the correct format via electronic mail to the technical contact.
- Make revisions to the Major NSR Summary Table using the *Tracked Changes* feature in Microsoft Word.
- Send the revised Major NSR Summary Table Word document to the assigned permit reviewer via electronic mail for review.

Monitoring and Testing Requirements: For each EPN, enter the special condition number(s) requiring monitoring and/or testing, as well as any control standard, emission limit, operations of control equipment, or monitoring equipment. Also, enter the special condition number(s) requiring any monitoring and/or testing of specific parameters used to calculate an emission rate and/or control standard. If the monitoring/testing requirements were specified in an NSR application and not in the permit, please identify the NSR project number, date of application, and the page number(s) in the application (as applicable) where the monitoring/testing information is specified. See the Example Major NSR Summary Table for citing NSR application information for reference. A copy of the NSR permit application page(s) must also be included with this form when citing the NSR permit application in lieu of special condition numbers.

Recordkeeping Requirements: For each EPN, enter the special condition number(s) requiring recordkeeping. Also, include the special condition number(s) requiring recordkeeping for any parameter used in the calculation of an emission rate and/or control standard. If the recordkeeping requirements were specified in an NSR application and not in the permit, please identify the NSR project number, date of application, and the page number(s) in the application (as applicable) where the monitoring/testing information is specified. See the Example Major NSR Summary Table for citing NSR application information for reference. A copy of the NSR permit application page(s) must also be included with this form when citing the NSR permit application in lieu of special condition numbers.

Reporting Requirements: For each EPN, enter the special condition number(s) requiring reporting. If the reporting requirements were specified in an NSR application and not in the permit, please identify the NSR project number, date of application, and the page number(s) in the application (as applicable) where the monitoring/testing information is specified. See the Example Major NSR Summary Table for citing NSR application information for reference. A copy of the NSR permit application page(s) must also be included with this form when citing the NSR permit application in lieu of special condition numbers.

Note: The Major NSR Summary Table identifies MRRT requirements that have been previously established and approved through the NSR review process to be sufficient to demonstrate compliance with the MAERT emission limits and other standards of the NSR permit. Therefore, the Major NSR Summary Table cannot be used to change the underlying NSR permit. Changes to underlying NSR conditions, emission limits, or the addition of MRRT requirements must be handled through the appropriate NSR application process. Keep in mind that the inability to identify NSR permit condition numbers and/or application information sufficient to demonstrate compliance with the MAERT limits is an indication of insufficient monitoring with the NSR permit and should be addressed by submitting an alteration to add sufficient monitoring.

When completing or revising the table, consider the following:

- The left-hand side of the table (MAERT side) must match the MAERT exactly, including the order of the units.
- List the special conditions or application information (see the note above) on an emission point basis instead of on a pollutant-by-pollutant basis.
- For each EPN, list each special condition or application information in a row separated by commas (horizontally rather than vertically) in one or more of the three MRRT columns, as applicable.
- List only the special condition numbers or application information which apply. Subparagraph designations or text describing the special condition or application information should not be included.
- Include any special conditions or application information which reference federal regulations with relevant requirements such as 40 CFR Part 60 (NSPS), 40 CFR Part 61 (NESHAP), or 40 CFR Part 63 (MACT).
- A condition or application information which requires monitoring or testing with a reporting or notification requirement implies recordkeeping even if records are not stated in the condition or application information.
- Include the special condition numbers or application information for one-time tests which have been completed.

Major NSR Summary Table – Instructions

- Include special conditions or application information which establish, monitor, or test a parameter used in the calculation of an emission rate and indirectly monitor an emission source such as annual leak testing of tank trucks, rail cars, or marine vessels.
- Major NSR Summary Table footnotes must match the MAERT footnotes.
- Use of or relying on confidential business information to demonstrate compliance does not satisfy EPA requirements.

**Example
Major NSR Summary Table**

Permits Numbers:					Issuance Date:		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.	Spec. Cond./Appl. Info.
HT-FUG	HT-FUG Fugitives (5)	Acrylic Acid	4.61	20.81	5, 6, 7, 8, 31	6, 7, 8, 31	Proj: XXXX, mm/dd/year, page QQQ
		H ₂ SO ₄	<0.01	0.01			
HT-1	A-Train Start-Up Heater (2,500 hours per year)	CO	24.58		3	3, 13, 29	3
		NO _x	9.18				
		PM	0.67				
		PM ₁₀	0.67				
		PM _{2.5}	0.67				
HT-2	B-Train Start-Up Heater (2,500 hours per year)	CO	12.42		3	3, 14	
		NO _x	9.09				
		PM	0.67				
		PM ₁₀	0.67				
		PM _{2.5}	0.67				

Major NSR Summary Table

Permits Numbers:					Issuance Date:		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rate		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)			
HT-cap	Cap for HT-1 and HT-2	CO		13.84	3	3, 13, 14, 29	3
		NO _x		6.36			
		PM		0.38			
		PM ₁₀		0.38			
		PM _{2.5}		0.38			
HT-29	HT-2 Cooling Tower	Acrylic Acid	1.39	6.07	15, 25	5, 10, 14, 15, 25	5, 25
		PM	0.26	1.15			
		PM ₁₀	0.13	0.49			
		PM _{2.5}	0.12	0.45			

- (1) Emission point identification – either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3) NO_x – total oxidizers of nitrogen
 PM – total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}
 PM₁₀ – particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}
 PM_{2.5} – particulate matter equal to or less than 2.5 microns in diameter
 CO – carbon monoxide
 H₂SO₄ – sulfuric acid
- (4) Compliance with annual emission limits (tons per year) is based on a 12-month rolling period.
- (5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.