

**Form OP-UA62**  
**Glycol Dehydration Unit Attributes**  
**Texas Commission on Environmental Quality**

The unit attributes (OP-UA) forms are used to provide a description and data pertaining to all emission units, emission points, processes and control devices with potentially applicable requirements associated with a particular regulated entity (RN) number and application. The information will be provided in an excel format. Each OP-UA form will include sheets for General Information, a Table of Contents, OP-SUM, OP-REQ2, and the unit attribute tables. The individual unit summary (OP-SUM) information and the negative applicable/superseded requirement determinations (OP-REQ2) will be provided on each individual OP-UA form for the applicable units identified in the unit attribute tables.

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**General Information Sheet**

The General Information sheet holds the permit information. The following permit application information is requested for the site:

**Date:**

Enter the date the application is being submitted by the applicant to TCEQ (MM/DD/YYYY). Any subsequent submittals must show the date of revision.

**Customer Reference No. (CN):**

Enter the customer reference number (CNXXXXXXXXXX). This number is issued by 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.

**Regulated Entity No. (RN):**

Enter the regulated entity reference number for the site (RNXXXXXXXXXX). This number is issued by 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.

**Permit No.:**

Enter the permit number assigned by TCEQ. Leave the permit number blank if a permit number has not been assigned.

**Permit Area Name:**

Enter the name of the application area (maximum 50 characters). This should be the same name provided on Form OP-1 (Site Information Summary).

**Permit Type:**

Choose the type of permit for which this application is being submitted from the dropdown menu (SOP, GOP, TOP). Information on the different permit types can be found on TCEQ's website at:  
[www.tceq.texas.gov/permitting/air/titlev/permit\\_types.html](http://www.tceq.texas.gov/permitting/air/titlev/permit_types.html).

**Project Type:**

Choose the project type for which this application is being submitted from the dropdown menu (Initial, Revision, Renewal).

**Submission Type:**

Choose the submission type for which this form is being submitted from the dropdown menu (New Application, Existing Application Update).

**Project Number:**

Enter the project number assigned by TCEQ. Leave the project number blank if a project number has not been assigned.

Title V Form Release Date, Form Number, APD ID Number, and Version Revised Date are present and cannot be altered.

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## Table of Contents Sheet

The Table of Contents lists all the sheets in the UA Form. If information is submitted on the OP-SUM, OP-REQ2 or the Unit Attribute tables, the "Data Submitted" column will display a "Yes". If no information is submitted, the "Data Submitted" column will remain blank. The Table of Contents information is auto populated. Applicants will not need to submit any information in the Table of Contents.

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## Instructions for OP-SUM Sheet

### General:

All emission points with one or more potentially applicable requirements addressed in this form must be identified on the OP-SUM sheet. The term "emission points" in these instructions has the meaning as defined in 30 TAC Chapter 101.

The purpose of this sheet is to list individual emission points addressed in the Federal Operating Permit (FOP) application and to provide identifying information and preconstruction authorizations. This form is also used to designate members of groups.

The corresponding preconstruction authorization for each emission point must also be listed on this form. For emission points which were authorized to construct or modify under Permits by Rule (PBR), list all applicable PBR information, including registration numbers. If an emission point is authorized under more than one preconstruction authorization, then list all applicable preconstruction authorizations, including any Prevention of Significant Deterioration (PSD) and/or nonattainment permit(s).

### Groups:

- A "group" is a collection of units/emission points or devices that have identical applicability (or non-applicability) determinations and may, or may not, have a physical relationship.
- Group members may have different 30 TAC Chapter 116 or 30 TAC Chapter 106 preconstruction authorizations.
- Groups may be used on UA forms only if all unit attributes are identical.
- All groups must be mutually exclusive. Emission points cannot be listed in more than one group on a given UA form.
- Grouping is optional.
- Groups are assigned an ID No. by the applicant, which must begin with the prefix "GRP" followed by a maximum of eleven characters (GRPXXXXXXX).

### Specific:

#### Table 1

### Unit Action Indicator (Unit AI):

Complete this section only for a permit revision or renewal. Select "A" from the dropdown menu if the emission point indicated is an addition to the existing permit. Select "D" from the dropdown menu if the existing emission point indicated is being deleted from the permit. If an emission point is not being added/deleted from the permit, leave blank.

### Revision No.:

Complete this section only for a permit revision or renewal. Enter the revision number identified on Form OP-2, Table 2. This number will link the specified change to the appropriate permit revision. If no changes are made to an existing emission point in the permit, leave blank.

**Emission Point ID No.:**

Each emission point must be assigned an identification number. (Maximum 14 characters)

- For emission points with potentially applicable requirements, enter the emission point numbers (EPNs) as listed in the TCEQ State of Texas Air Reporting System (STARS).
- If EPN currently does not exist in STARS, then a new ID No. that is consistent with the existing numbering system must be provided by the applicant. Emission point ID Nos. cannot begin with “GRP” (the character sequence reserved for Group ID Nos.).

**Group ID No.:**

If applicable, enter the unique identification number for the group which includes this emission point (GRPXXXXXX) (“GRP” followed by a maximum of 11 characters). If the emission point is not a member of a group, leave this column blank. (See general instructions, above, for information regarding requirements for grouping emission points in FOP applications.)

**Emission Point Name/Description:**

Each emission point must be given a name or description that distinguishes it from other emission points as much as practicable. The Emission Point Name/Description should clearly indicate the type of emission point. If possible, please avoid using generic descriptions, such as “Vent”, for multiple emission points. (Maximum 50 characters)

- Enter a text name or description for the emission point from STARS whenever possible.
- If no STARS name currently exists, a new name that is consistent with the existing naming convention must be provided by the applicant.

**Example:** The following example is intended as guidance on completion of columns on OP-SUM. It should be assumed that all criteria for inclusion in the application are met. Criteria for grouping are also assumed to be satisfied.

Emission Point ID No.	Group ID No.	Emission Point Name/Description
B-1-STK	GRP-STACK	Boiler 1 Stack
B-2-STK	GRP-STACK	Boiler 2 Stack
T3VENT		Tank 3 Vent

**CAM (For reference only):**

Indicate if the emission point is subject to 40 CFR Part 64 by selecting “Y” from the dropdown menu in the “CAM” column next to the emission point. Please refer to 40 CFR Part 64 to determine applicability. *Certification by the Responsible Official (RO) pursuant to 30 TAC § 122.165 does not extend to the information which is designated on forms as “For reference only.”*

**Preconstruction Authorizations (PCA):**

At least one PCA must be indicated for each emission point; however, an emission point may have multiple authorizations. *All preconstruction authorizations listed on this form must also be identified on Form OP-REQ1.*

When an emission point has multiple authorizations, each PCA must be listed in a separate row.

*The following examples are intended as guidance on completion of columns for the preconstruction authorizations. The examples are followed by specific instructions for each column.*

Example 1: Adding multiple PCA Categories for an emission point

Unit AI	Revision No.	Unit ID No.	Group ID No.	Unit Name/Description	CA M	PCA AI	Preconstruction Authorization (PCA) Category	Authorization/Registration Number	Permit By Rule (PBR) Number	PBR Effective Date
A		Flare1		Diamine Flare	Y	A	NSR Permit	1234		
A		Flare1		Diamine Flare	Y	A	PSD	PSDTX1234		
A		Flare1		Diamine Flare	Y	A	PBR	23456, 34567	106.261	11/01/2003
A		Flare1		Diamine Flare	Y	A	PBR	23456, 34567	106.262	11/01/2003

Example 2: Adding and deleting a PCA for an emission point

Unit AI	Revision No.	Unit ID No.	Group ID No.	Unit Name/Description	CAM	PCA AI	Preconstruction Authorization (PCA) Category	Authorization/Registration Number	Permit By Rule (PBR) Number	PBR Effective Date
		T-3	GRPTANKS	Tank 3		A	Standard Permit	12345		
		T-3	GRPTANKS	Tank 3		D	PBR		106.432	09/04/2000

#### Preconstruction Authorization Action Indicator (PCA AI):

Select “A” from the dropdown menu if a preconstruction authorization is being added for the emission point. Select “D” from the dropdown menu if a preconstruction authorization is being deleted from the emission point. If a preconstruction authorization is not being added/deleted from the emission point, leave blank.

#### Preconstruction Authorization (PCA) Category:

Select from the dropdown menu the category of the PCA being added or deleted.

- PBR - Permit by Rule claimed or registered under 30 TAC Chapter 106
- Standard Permit - 30 TAC Chapter 116 and non-rule Air Quality Standard Permits
- NSR Permit - 30 TAC Chapter 116 preconstruction authorizations
- PSD - Prevention of Significant Deterioration Permits
- Nonattainment - Nonattainment Permits
- GHG – Greenhouse Gas Permits
- 112(G) [HAP] - Hazardous Air Pollutant Permits
- MSW or IHW - Municipal Solid Waste or Industrial Hazardous Waste Permits
- Exemption – De Minimis Facilities or Sources authorized by 30 TAC Chapter 116, § 116.119

#### Authorization/Registration Number:

List all TCEQ permit numbers for 30 TAC Chapter 116 preconstruction authorizations, Title I preconstruction authorizations (PSD and nonattainment permits) and 30 TAC Chapter 106 (PBR) registration numbers, under which the emission point is operating.

- **30 TAC Chapter 116 Permits:** Enter the TCEQ permit number, for example, 12345. This includes special permits and standard permit registrations.
- **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. *Title I authorizations should only be listed for emission points addressed by the PSD or nonattainment permits.*
- **Nonattainment Permit:** Enter each nonattainment permit number (NXXX), for example, N123. If the nonattainment permit has been modified, include the “M” suffix (NXXXMXX), for example, N123M5. *Title I authorizations should only be listed for emission points addressed by the PSD or nonattainment permits.*
- **Permit by Rule (previously Standard Exemption):** Enter the PBR Registration No. for each PBR registered under 30 TAC Chapter 106 and each standard exemption previously registered under 30 TAC Chapter 116.
- **Exemption:** Enter 116.119 for a de minimis facility or source, which has other potentially applicable or

applicable requirements (these are authorized by 30 TAC Chapter 116, § 116.119). *De minimis facilities or sources should not be included if there are no other potentially applicable or applicable requirements.*

### Permit by Rule (PBR) Number:

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 in the appropriate format shown below.

*Note: All emission points authorized by PBR must also be identified on Form OP-PBRSUP.*

Format	PBR/standard exemption claimed or registered date
106.XXX	Authorized on or after March 14, 1997 (except 106.181 is on or after December 27, 1996)
XXX	Authorized prior to March 14, 1997

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

### PBR Effective Date:

For each PBR claimed or registered under 30 TAC Chapter 106 and each standard exemption claimed or registered, enter the effective date of the rule. MM/DD/YYYY = *Effective date of the Standard Exemption or PBR in effect at the time claimed or granted. Information on version dates is available at:*

Information on Chapter 116 version dates is available at:

[www.tceq.texas.gov/permitting/air/permitbyrule/historical\\_rules/oldselist/se\\_index.html](http://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](http://www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html).

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. Each standard exemption now resides in a section of 30 TAC Chapter 106 (e.g., 30 TAC § 106.148) and now is referred to as a PBR.

(Standard exemptions were readopted under the PBR designation on March 14, 1997.) Information regarding PBRs may be found on the TCEQ website at <https://www.tceq.texas.gov/permitting/air/permitbyrule/air-pbr>.

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:

Permit By Rule (PBR) Number	PBR Effective Date
6	07/20/1992

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:

Permit By Rule (PBR) Number	PBR Effective Date
106.512	03/14/1997

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## Instructions for OP-REQ2 Sheet

**General:**

The purpose of this sheet 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 emission points when a permit shield is requested. Negative applicability or superseded requirement determinations when a permit shield is NOT requested may be documented on this sheet OR the appropriate unit attribute table.

A negative applicability determination is any regulatory citation that provides the basis whereby every operating condition of an emission point 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 emission points 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 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 an emission point 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 point before listing the next emission point.

Negative applicability or superseded requirement determinations for potentially applicable requirements, confirmed by TCEQ, may be approved as a permit shield (see instructions outlined in Area Wide Applicability Determinations, Form OP-REQ1, to request a permit shield). If a permit shield is requested, the determinations are always required on the OP-REQ2 sheet. For additional information relating to permit shields, refer to the TCEQ guidance document entitled "Site Operating Permit (SOP) Permit Shield Guidance found on TCEQ's website at:

[www.tceq.texas.gov/permitting/air/guidance/titlev/tv\\_site\\_guidance.html](http://www.tceq.texas.gov/permitting/air/guidance/titlev/tv_site_guidance.html).

**Specific:**

Fill out the OP-REQ2 sheet to provide a negative applicability determination for emission points included on this OP-UA form. If the emission point is not submitted on an OP-UA form, submit the negative applicability determination on the standalone OP-REQ2 form.

**Unit Action Indicator (AI):**

Complete this section only for a permit revision or renewal. Select "A" from the dropdown menu if the negative applicability or superseded requirement is an addition to the permit. Select "D" from the dropdown menu if the negative applicability or superseded requirement is being deleted from the permit. For revisions to existing negative applicability or superseded requirements in the permit, use the "D" indicator for the existing permit shield and the "A" indicator for the revised permit shield.

**Revision No.:**

Complete this section only for a permit revision or renewal. Enter the revision number identified on Form OP-2, Table 2 (only for revision items within the application). This number will link the specific negative applicable requirement determination to the appropriate revision.

**Emission Point ID No.:**

Select the identification number (ID No.) (maximum 14 characters) of the emission point as listed on the OP-SUM sheet.

**Potentially Applicable Regulatory Name:**

Select the name of the potentially applicable requirement from the dropdown menu for which negative applicability or superseded requirement is being demonstrated. If the potentially applicable regulatory name is not found in the dropdown menu, enter it manually (maximum 50 characters).

*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	Potentially Applicable Regulatory Name (Input Format)	Negative Applicability or Superseded Requirement 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, New Source Performance Standards (NSPS)	NSPS XXX	§ 60.XXX(x)(yy)(zz)
40 CFR Part 61, Subparts, National Emission Standards for Hazardous Air Pollutants (NESHAP)	NESHAP XX	§ 61.XX(x)(yy)(zz)
40 CFR Part 63, Subparts, NESHAP by source category, including hazardous organic (HON)	MACT XX	§ 63.XXX(x)(yy)(zz)

\* This list is not intended to be exhaustive

**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).

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## OP-UA62 Form Unit Attribute - Instructions

**General:**

This form is used to provide a description and data pertaining to all emission points, stationary vents, distillation operation vents, and process vents with potentially applicable requirements associated with a particular account number and application. Each table number, along with the possibility of a corresponding letter (i.e., Table 1a, Table 1b), corresponds to a certain state or federal rule. If the rule on the table is not potentially applicable to an emission point, stationary vent, distillation operation vent and/or process vent, then it should be left blank and need not be submitted with the application. If the codes entered by the applicant show negative applicability to the rule or sections of the rule represented on the table, then the applicant need not complete the remainder of the table(s) that corresponds to the rule. Further instruction as to which questions should be answered and which questions should not be answered are located in the “Specific” section of the instruction text. The following is included in this form:

**Tables 1a - 1c:**      **Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63), Subpart HH: National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities**

The application area name from Form OP-1 (Site Information Summary) must appear in the header of each page for the purpose of identification for the initial submittal. The date of the initial form submittal must also be included and should be consistent throughout the application (MM/DD/YYYY). Leave the permit number blank for the initial form submittal. If this form is included as part of the permit revision process, enter the permit number assigned by the TCEQ, the area name (from Form OP-1), the date of the revision submittal, and the account number.

Unit attribute questions that do not require a response from all applicants are preceded by qualification criteria in the instructions. If the unit does not meet the qualification criteria, a response to the question is not required. Anytime a response is not required based on the qualification criteria, leave the space on the form blank.

Notwithstanding any qualification criteria in the form instructions or information provided in other TCEQ guidance, the applicant may leave an attribute question blank (or indicate “N/A” for “Not Applicable”) if the attribute is not needed for the applicable requirement determinations of regulation for a unit.

Please note that for general operating permit (GOP) applications, responses may be required for questions on this form which are not included as a column in the applicable GOP table. These responses may be needed to determine applicability of certain requirements within a single row of the GOP permit table.

In some situations, the applicant has the option of selecting alternate requirements, limitations, and/or practices for a unit. Note that these alternate requirements, limitations, and/or practices must have the required approval from the TCEQ Executive Director and/or the U.S. Environmental Protection Agency (EPA) Administrator before the federal operating permit application is submitted.

The Texas Commission on Environmental Quality (TCEQ) requires that a Core Data Form be submitted on all incoming registrations unless all of the following are met: the Regulated Entity and Customer Reference Number have been issued by the TCEQ and no core data information has changed. The Central Registry, a common record area of the TCEQ, maintains information about TCEQ customers and regulated activities, such as company names, addresses, and telephone numbers. This information is commonly referred to 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 Customer Reference (CN) number and the Regulated Entity (RN) number. 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 the 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 website at [www.tceq.texas.gov/permitting/central\\_registry/guidance.html](http://www.tceq.texas.gov/permitting/central_registry/guidance.html).



**Specific:**

**Table 1a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63), Subpart HH: National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities**

- ★ **Complete Tables 1a - 1c only for glycol dehydration unit process vents located at oil and natural gas production facilities which meet the criteria specified in 40 CFR § 63.760(a)(1) and either 40 CFR § 63.760(a)(2) or (a)(3), but not meeting an exemption specified in 40 CFR § 63.760(e).**

**Emission Point ID No.:**

Enter the identification number (ID No.) for the glycol dehydration unit process vent (maximum 14 characters) as listed on Form OP-SUM.

**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]). General operating permit (GOP) applicants should indicate the appropriate GOP index number in this column from the applicable GOP table (SSS-FF-XXX). Applicants should complete all applicable GOP attribute information before determining the GOP index number. For additional information relating to SOP and GOP index numbers, please go to the TCEQ website at [www.tceq.texas.gov/permitting/air/guidance/titlev/tv\\_fop\\_guidance.html](http://www.tceq.texas.gov/permitting/air/guidance/titlev/tv_fop_guidance.html).

**Alternate Means of Emission Limitation (AMEL):**

Enter "YES" if the EPA Administrator has approved an AMEL in accordance with 40 CFR § 63.777. Otherwise, enter "NO."

**AMEL ID No.:**

If an AMEL has been approved, then enter the corresponding AMEL unique identifier (maximum 14 characters) for each unit. If the unique identifier is unavailable then enter the date of the AMEL approval letter. The unique identifier and/or the date of the approval letter is contained in the compliance file under the appropriate account number. Otherwise, leave this column blank.

- ▼ **Continue only if "Alternate Means of Emission Limitation" is "NO."**

**HAP Source:**

Select one of the following options to describe the hazardous air pollutant (HAP) source classification

<b>Code</b>	<b>Description</b>
MAJOR	Any stationary source or group of stationary sources of HAPs meeting the definition of a major source as defined in 40 CFR § 63.761
AREA	Any stationary of the source of HAPs that is not a major source as defined in 40 CFR § 63.761 (i.e. area source of HAPS)

**Affected Source Type:**

Select one of the following options that describes the affected source. Enter the code on the form.

For sources located at a major source of HAPs or area source of HAPs required to comply with major source requirements due to EPA's once in always in policy:

<b>Code</b>	<b>Description</b>
LARGE	Large glycol dehydration unit as defined in 40 CFR § 63.761.
SMALL	Small glycol dehydration unit as defined in 40 CFR § 63.761.

For sources located at an area source of HAPs:

Code	Description
TEGU	Triethylene glycol (TEG) dehydration unit located within an UA plus offset and UC boundary
NTEGU	Triethylene glycol (TEG) dehydration unit not located within an UA plus offset and UC boundary

★ **Complete “Area Source Exemption” only if “Affected Source Type” is “TEGU” or “NTEGU.”**

**Area Source Exemption:**

Select one of the following options to indicate if the TEG dehydration unit meets an exemption in 40 CFR § 63.764(e)(1). Enter the code on the form.

Code	Description
85-	Actual annual average flowrate of natural gas to the TEG unit is less than 85,000 standard cubic meters per day
90-	Actual average emissions of benzene from the TEG unit process vent are less than 0.90 megagrams per year
NONE	The TEG unit does not meet an exemption in 40 CFR § 63.764(e)(1)

▼ **Do not continue if “Area Source Exemption” is “85-” or “90-” or if “Affected Source Type” is “NTEGU.”**

▼ **Do not continue for GOPs if “HAP Source” is “AREA” and the “Affected Source Type” is “NTEGU.”**

★ **Complete “Existing Unit” only if “Affected Source Type” is “SMALL.”**

**Existing Unit:**

Enter “YES” if the affected source is an existing small glycol dehydration unit as defined in 40 CFR § 63.761. Otherwise, enter “NO.”

**Table 1b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63), Subpart HH: National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities**

**Emission Point ID No.:**

Enter the identification number (ID No.) for the glycol dehydration unit process vent (maximum 14 characters) as listed on Form OP-SUM.

**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]). General operating permit (GOP) applicants should indicate the appropriate GOP index number in this column from the applicable GOP table (SSS-FF-XXX). Applicants should complete all applicable GOP attribute information before determining the GOP index number. For additional information relating to SOP and GOP index numbers, please go to the TCEQ website at [www.tceq.texas.gov/permitting/air/guidance/titlev/tv\\_fop\\_guidance.html](http://www.tceq.texas.gov/permitting/air/guidance/titlev/tv_fop_guidance.html).

**Process Vent Control:**

Select one of the following options to indicate the method used to control emissions from the glycol dehydration unit process vent, in accordance with 40 CFR § 63.765. Enter the code on the form.

For large glycol dehydration units and area source TEG dehydration units:

<b>Code</b>	<b>Description</b>
PNGL	Process vent is connected to a process natural gas line [40 CFR § 63.765(c)(1)]
CD-CVS	Process vent is connected to a control device or a combination of control devices through a closed-vent system [40 CFR § 63.765(b)(1)(i)]
B90	Process vent is connected to a control device or a combination of control devices through a closed-vent system and the outlet benzene emissions from the control device(s) are reduced to a level less than 0.90 megagrams per year [40 CFR § 63.765(b)(1)(ii)]
MOD	Total hazardous air pollutant (HAP) emissions to the atmosphere are reduced by 95% through process modifications alone (For SOP applications only) [40 CFR § 63.765(c)(2)]
COMB	Total HAP emissions to the atmosphere are reduced by 95% through a combination of process modifications and one or more control devices (For SOP applications only)

For small glycol dehydration units:

<b>Code</b>	<b>Description</b>
PNGL	Process vent is connected to a process natural gas line [40 CFR § 63.765(c)(1)]
BTEX	BTEX emissions are limited by a control device or a combination of control devices through a closed-vent system
BMOD	BTEX emissions are limited through process modifications alone
BCOMB	BTEX emissions are limited through a combination of process modifications and one or more control devices
UNCON	BTEX emissions limit is met through the actual uncontrolled operation

▼ **Do not continue if “Process Vent Control” is “PNGL,” “MOD,” “BMOD,” or “UNCON.”**

#### **Bypass Device:**

Enter “YES” if the closed-vent system contains one or more bypass devices that could be used to divert all or a portion of the gases, vapors, or fumes from entering the control device. Otherwise, enter “NO.”

★ **Complete “Flow Indicator” only if “Bypass Device” is “YES.”**

#### **Flow Indicator:**

Enter “YES” if a flow indicator is installed at the inlet to the bypass device. Otherwise, enter “NO.”

#### **Sealed Closed Vent System:**

Enter “YES” if the closed-vent system contains joints, seams, or other connections that are permanently or semi-permanently sealed (e.g., a welded joint between two sections of hard piping or a bolted and gasketed ducting flange). Otherwise, enter “NO.”

#### **Unsafe To Inspect:**

Enter “YES” if any parts of the closed-vent system are designated as unsafe to inspect, as described in 40 CFR § 63.773(c)(5)(i) - (ii). Otherwise, enter “NO.”

#### **Difficult To Inspect:**

Enter “YES” if any parts of the closed-vent system are designated as difficult to inspect, as described in 40 CFR § 63.773(c)(6)(i) - (ii). Otherwise, enter “NO.”

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**Table 1c: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63), Subpart HH: National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities**
**Emission Point ID No.:**

Enter the identification number (ID No.) for the glycol dehydration unit process vent (maximum 14 characters) as listed on Form OP-SUM.

**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]). General operating permit (GOP) applicants should indicate the appropriate GOP index number in this column from the applicable GOP table (SSS-FF-XXX). Applicants should complete all applicable GOP attribute information before determining the GOP index number. For additional information relating to SOP and GOP index numbers, please go to the TCEQ website at

[www.tceq.texas.gov/permitting/air/guidance/titlev/tv\\_fop\\_guidance.html](http://www.tceq.texas.gov/permitting/air/guidance/titlev/tv_fop_guidance.html).

**Control Device Type:**

Select one of the following options for the type of control device. Enter the code on the form.

**Enclosed Combustion Devices:**

<b>Code</b>	<b>Description</b>
THERM	Thermal vapor incinerator
CATA	Catalytic vapor incinerator
BPH	Boiler or process heater

**Vapor Recovery Devices:**

<b>Code</b>	<b>Description</b>
COND	Condenser
RCADS	Regenerable carbon adsorption system
NCADS	Nonregenerable carbon adsorption system

**Other Control Device:**

<b>Code</b>	<b>Description</b>
FLARE	Flare

**Control Device ID No:**

If applicable, enter the identification number for the control device to which tank emissions are routed (maximum 14 characters). This number should be consistent with the identification number listed on the Form OP-SUM (Individual Unit Summary).

▼ **Do Not Continue if “Control Device Type” is “FLARE.”**

- ★ Complete “Control Device Operation” only if “Process Vent Control” is “CD-CVS,” “COMB,” “BTEX,” or “BCOMB” and “Control Device Type” is not a “FLARE.”

### Control Device Operation:

Select one of the following options for the operation of the enclosed combustion device. Enter the code on the form.

For Large Glycol Dehydration Units:

Code	Description
TOC/HAP95	Reduces the mass content of either total organic compounds (TOC) or total hazardous air pollutants (HAP) in the gases vented to the device by greater than or equal to 95.0 weight percent
TOC/HAP20	Reduces the concentration of either TOC or total HAP in the exhaust gases at the outlet to the device to a level less than or equal to 20 ppmv on a dry basis corrected to 3% oxygen
MRTT	Operates at a minimum temperature of 760 <sup>0</sup> C provided the control device has demonstrated, under 40 CFR §63.772(e), that combustion zone temperature is an indicator of destruction efficiency
MASS	The mass content of BTEX in the gases vented to the control device is reduced

For Small Glycol Dehydration Units:

Code	Description
MASS	The mass content of BTEX in the gases vented to the control device is reduced
TOC/HAP20	Reduces the concentration of either TOC or total HAP in the exhaust gases at the outlet to the device to a level less than or equal to 20 ppmv on a dry basis corrected to 3% oxygen

### Performance Test/Design Analysis Exemption:

Select one of the following options to indicate the specific control device performance test/design analysis exemption being used. Enter the code on the form.

For Boilers and Process Heaters:

Code	Description
44+	Design heat input capacity is greater than or equal to 44 megawatts (MW) [40 CFR § 63.772(e)(1)(ii)]
FUEL	Vent stream is introduced into the boiler or process heater with the primary fuel or is used as the primary fuel [40 CFR § 63.772(e)(1)(iii)]
HAZ1	Burning hazardous waste, a final permit under 40 CFR Part 270 has been issued and complying with the requirements of 40 CFR Part 266, subpart H; or burning hazardous waste and compliance has been certified with the interim status requirements of 40 CFR Part 266, Subpart H (For SOP applications only) [40 CFR § 63.772(e)(1)(iv)]
SAME	A performance test, which uses the same methods specified in 40 CFR § 63.772, was conducted for another regulation promulgated by the EPA and either no process changes have been made since the test, or the owner or operator can demonstrate that the results of the performance test reliably demonstrate compliance despite process changes [40 CFR § 63.772(e)(1)(vi)]
NONE	No performance test/design analysis exemption is being utilized.

For Thermal Vapor Incinerators:

<b>Code</b>	<b>Description</b>
HAZ2	Control device is a hazardous waste incinerator for which the owner or operator has been issued a final permit under 40 CFR Part 270 and is complying with the requirements of 40 CFR Part 264, subpart O, or has certified compliance with the interim status requirements of 40 CFR Part 265, subpart O (For SOP applications only) [40 CFR § 63.772(e)(1)(v)]
SAME	A performance test, which uses the same methods specified in 40 CFR § 63.772, was conducted for another regulation promulgated by the EPA and either no process changes have been made since the test, or the owner or operator can demonstrate that the results of the performance test reliably demonstrate compliance despite process changes [40 CFR § 63.772(e)(1)(vi)]
NONE	No performance test/design analysis exemption is being utilized.

For Catalytic Vapor Incinerators, Condensers and Carbon Adsorption Systems:

<b>Code</b>	<b>Description</b>
SAME	A performance test, which uses the same methods specified in 40 CFR § 63.772, was conducted for another regulation promulgated by the EPA and either no process changes have been made since the test, or the owner or operator can demonstrate that the results of the performance test reliably demonstrate compliance despite process changes [40 CFR § 63.772(e)(1)(vi)]
NONE	No performance test/design analysis exemption is being utilized.

★ **Complete “Performance Test or Design Analysis” only if “Performance Test/Design Analysis Exemption” is “NONE.”**

**Performance Test or Design Analysis:**

Select one of the following options to indicate the method used to demonstrate the control device achieves its appropriate performance requirements specified in 40 CFR § 63.771(d)(1), (e)(3), or (f)(1). Enter the code on the form.

For Boilers, Process Heaters, and Vapor Incinerators:

<b>Code</b>	<b>Description</b>
PT	Performance test conducted as specified in 40 CFR § 63.772(e)(3)
PTM	Performance test conducted by the manufacturer as specified in 40 CFR § 63.772(h)

For Condensers:

<b>Code</b>	<b>Description</b>
PT	Performance test conducted as specified in 40 CFR § 63.772(e)(3)
DA	Design analysis conducted as specified in 40 CFR § 63.772(e)(4)
MOD	Using the procedures documented in the GRI report entitled, “Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions” as inputs for the model