

**OIL AND GAS GENERAL OPERATING PERMIT
FOR ALL TEXAS COUNTIES EXCEPT ARANSAS, BEXAR, BRAZORIA, CALHOUN,
CHAMBERS, COLLIN, DALLAS, DENTON, EL PASO, FORT BEND, GALVESTON,
GREGG, HARDIN, HARRIS, JEFFERSON, LIBERTY, MATAGORDA,
MONTGOMERY, SAN PATRICIO, TARRANT, TRAVIS, VICTORIA, AND WALLER
COUNTIES TECHNICAL SUMMARY**

SUMMARY

The Texas Natural Resource Conservation Commission (TNRCC or commission) Executive Director is issuing an Oil and Gas General Operating Permit (GOP) for all Texas Counties except Brazoria, Chambers, Collin, Dallas, Denton, El Paso, Fort Bend, Galveston, Hardin, Harris, Jefferson, Liberty, Montgomery, Orange, Tarrant, and Waller Counties (GOP Number 514). The GOP issuance fulfills the obligation to renew the corresponding Oil and Gas GOP residing in Title 30 Texas Administrative Code (30 TAC) Chapter 122 (Chapter 122), Federal Operating Permits, that became effective on October 21, 1996. The GOP also contains revisions to codified applicable requirements and new applicable requirements (i.e., minor New Source Review [NSR]) as a result of amended regulations or the adoption of new regulations. This document provides an explanation of GOP procedural requirements and a discussion of the GOP, comments, and responses to comments.

GOP NUMBER 514 PROCEDURAL REQUIREMENTS

The GOP Number 514 is issued by the TNRCC Executive Director under the requirements of Chapter 122, Subchapter F (General Operating Permits). These requirements include a 30-day public comment period with an opportunity to request a notice and comment hearing, an affected state review, a 45-day U.S. Environmental Protection Agency (EPA) review period, and a 60-day public petition period during which the public may petition the EPA to object to the GOP.

On August 10, 2001, a notice of the opportunity for public comment and hearing on the draft GOP Number 514 was published in the *Texas Register*; the TNRCC Air Permits Division (APD) Internet site; and general circulation newspapers in Austin, Corpus Christi, Dallas, El Paso, Fort Worth, Houston, and Midland. The EPA and affected state review periods also began on this date.

The public comment and affected state review periods officially closed September 10, 2001. Comments were received from the Texas Oil and Gas Association (TxOGA); Baker Botts L.L.P. (Baker Botts), on behalf of the Texas Industry Project (TIP); and ONEOK Field Services. No comments were received from affected states. Additionally, no requests for a public hearing on the draft GOP Number 514 were received during this period.

The EPA review period ended September 24, 2001. No comments were received from the EPA.

From the date of issuance, GOP Number 514 is subject to public petition for 60 days as specified under 30 TAC § 122.360 (Public Petition). If the EPA does not file an objection with the executive

director during the EPA review period, any person affected by a decision of the executive director to issue GOP Number 514 may petition the EPA to make an objection. Petitions shall be based only on objections to GOP Number 514 that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates in the petition to the EPA that it was not possible to raise the objections within the public comment period, or that the grounds for the objection arose after the public comment period. The petition shall identify all objections. A copy of the petition shall be provided to the executive director by the petitioner. The executive director shall have 90 days from the receipt of an EPA objection to resolve any objection and, if necessary, terminate or revise GOP Number 514.

EXPLANATION OF GOP NUMBER 514

As previously mentioned, the issuance of GOP Number 514 fulfills the obligation to renew the oil and gas GOP in 30 TAC § 122.514 (Oil and Gas General Operating Permit - All Texas Counties Except for Aransas, Bexar, Brazoria, Calhoun, Chambers, Collin, Dallas, Denton, El Paso, Fort Bend, Galveston, Gregg, Hardin, Harris, Jefferson, Liberty, Matagorda, Montgomery, San Patricio, Tarrant, Travis, Victoria, and Waller Counties) that became effective on October 21, 1996. The GOP also contains revisions to codified applicable requirements and new applicable requirements (i.e., minor NSR) as a result of amended regulations or the adoption of new regulations. Once the GOP becomes effective, the owners or operators of sites authorized to operate under a GOP will have 45 days to update GOP applications to reflect the revisions. Updating applications will require the owner or operator to identify the items that have changed in the GOP application. Sites currently authorized to operate under the 30 TAC § 122.514 GOP will not be affected by the issuance of GOP Number 514 provided the applicability determinations and the bases for the determinations affecting a site remain unchanged. If the updated application is submitted within 6 - 18 months of the five-year anniversary of the issuance of the authorization to operate, the owner or operator also has the option of submitting a request for a renewal of the authorization to operate in conjunction with the updated application.

Section (a) of GOP Number 514 establishes the qualification criteria that the site or emissions units at the site meet in order to be authorized to operated under this GOP. The qualification criterion consists of the conditions consistent with the limitations of a GOP. Since a GOP authorizes the operation of multiple sites and cannot contain compliance provisions or a schedule for a specific site, owners or operators must apply for a site operating permit (SOP) that contains a compliance schedule if the site or units at the site are out of compliance at the time of application submittal. Qualification criteria are also used to identify emission units (including equipment, processes, or operations) to be excluded from coverage by a GOP to minimize the size and complexity of the GOP. Additionally, qualification criteria are used to exclude the types of emission units that are not commonly found sites that would use the GOP or for emission units with applicable requirements slightly different from many of the other sites. Alternative means of compliance, alternative means of control, alternative emission limitations or standards, or equivalent requirements that must be approved by the executive director or the Administrator of the EPA, typically, are not codified in a GOP due to the need for specific provisions. Owners or operators of emission units excluded by qualification criteria or having applicable requirements not codified in the GOP must apply for a SOP for those emission units or the entire site.

The GOP Number 514 qualification criteria remain consistent with those in the draft GOP Number 514 qualification criteria, with the exception of one change based on a comment received during the comment period. The GOP Number 514 qualification criteria are based on the qualification criteria found in 30 TAC § 122.514. However, qualification criteria were added to GOP Number 514 to reduce complexity and are discussed below. Several 30 TAC § 122.514 qualification criteria were also revised or omitted to provide expanded usage of GOP Number 514 and are also discussed below. A permit holder having an authorization to operate under the 30 TAC § 122.514 GOP and a SOP for an emission unit excluded by the qualification criteria may keep the separate SOP and GOP authorization to operate. As an option, after reviewing GOP Number 514 qualification criteria to determine if an emission unit may now be authorized to operate under the GOP, the permit holder may revise the GOP application to include the emission unit. A new authorization to operate under GOP Number 514 will then be issued to the permit holder and the SOP may be voided.

Since a GOP title cannot establish applicability, a new criterion was added under GOP Number 514(a)(1). This criterion clarifies that emission units shall be located in the specified counties for which the GOP is developed in order to receive an authorization to operate.

Based on the Chapter 122 revision effective June 3, 2001, minor NSR is now an “applicable requirement.” In the revision, the commission amended the definition of “applicable requirement” in 30 TAC §122.10(2) to address an inconsistency identified by the EPA between 30 TAC Chapter 122 and Title 40 Code of Federal Regulations (40 CFR) Part 70 (Part 70) (60 FR 30037). Under the amended applicable requirement definition, all requirements under 30 TAC Chapter 106, Subchapter A, Permits by Rule, or 30 TAC Chapter 116, Control of Air Pollution By Permits for New Construction or Modification, and any term or condition of any NSR authorization becomes an applicable requirement of the operating permit program. Since all NSR authorizations, including federal prevention of significant deterioration (PSD) and federal nonattainment (NA) permits, are now applicable requirements, emission units having a federal PSD or NA permit may now qualify to operate under GOP Number 514.

A new criterion was added in GOP Number 514(a)(12) to address a vapor pressure limitation for volatile organic compound (VOC) loading/unloading operations in covered attainment counties subject to 30 TAC Chapter 115 (Chapter 115), Subchapter C, Division 1 (Loading and Unloading of Volatile Organic Compounds). This criterion is consistent with the vapor pressure limitation for loading and unloading operations in other oil and gas GOPs.

Section (b) of GOP Number 514 contains site-wide requirements. A site-wide requirement is a requirement that applies uniformly to the emission units at the site. As an example, the APD has designated certain requirements of 30 TAC Chapter 111 (Chapter 111) (Control of Visible Emissions and Particulate Matter), such as the opacity limits for stationary vents, as site-wide requirements. These requirements were designated as site-wide since many sites have numerous stationary vents and each must comply with the appropriate opacity limit. Additional information relating to site-wide requirements may be found in the APD document entitled “Federal Operating Permit Application Guidance.” Appendix A of this document contains a listing of the site-wide requirements codified in GOP Number 514.

The GOP Number 514 site-wide requirements remain consistent with the draft GOP Number 514 site-wide requirement, with the exception of one change based on a comment received during the comment period. The GOP Number 514 site-wide requirements are based on the site-wide requirements found in 30 TAC § 122.514. However, site-wide requirements were added to GOP Number 514 to include applicable requirements that may affect emission units operating under the GOP and are discussed below. Several 30 TAC § 122.514 site-wide requirements were also revised or omitted, as discussed below. For sites having emission units associated to one of these site-wide requirements, it may be necessary for owners or operators to obtain a new authorization to operate under GOP Number 514 since applicability determinations and the determination bases affecting the emission units will most likely have changed.

Based on the Chapter 122 revision effective June 3, 2001, minor NSR is now an “applicable requirement,” as previously discussed. The GOP Number 514(b)(4) requirements now reflect this change. All sites having NSR authorizations are affected by this addition. However, the initial GOP applications should already have NSR authorizations listed in the application area-wide applicability determinations and general information portion of the application (Form OP-REQ1). Since minor NSR was not an applicable requirement when the initial GOP applications were submitted, these authorizations were identified as “for reference only.” To reduce the need for updating NSR authorizations in application revisions when there are no changes, a sentence has been added to GOP Number 514(b)(4) to reflect that NSR authorizations identified as “For Reference Only” are now applicable requirements. Permit holders are, therefore, only required to update NSR authorizations through an application revision if new or additional authorizations need to be included in the application.

The Chapter 111 applicable requirements codified in 30 TAC § 122.514(b)(7) were included in GOP Number 514 with several changes. Periodic monitoring requirements were added to the applicable requirements originally contained in 30 TAC § 122.514(b)(7)(A), (B), (D), and (E) to address EPA concerns of inadequate monitoring for the codified applicable requirements and to provide consistency with SOP site-wide requirements. These Chapter 111, Subchapter A, Division 1 (Visible Emissions) applicable requirements are now located in GOP Number 514(b)(5)(A), (B), (D), and (E). A new site-wide requirement was codified in GOP Number 514(b)(5)(G) to provide consistency with SOP site-wide requirements.

During the draft GOP Number 514 comment period, the period monitoring requirements for stationary vents subject to 30 TAC § 111.111(a)(1)(A) and (B) were revised in SOPs to specify that visible emission observations are not required for certain emission units. These emission units include stationary vessels (which includes both storage and process vessels), tanks, reservoirs, distillation columns, decanters, or other containers holding a VOC, and water separators which separate material containing a VOC. Since these types of emission units are unable to exceed the opacity limitations in 30 TAC § 111.111(a)(1)(A) and (B) due to the characteristics of a VOC, they were excluded from the visible observation requirements. To provide consistency with SOPs, this exclusion is reflected in GOP Number 514(b)(5)(A) and (B).

Likewise, during the draft GOP Number 514 comment period, the period monitoring requirements for all other sources not specified in 30 TAC § 111.111(a)(1), (4), or (7) were revised in SOPs to

specify that visible emission observations are not required for fugitive emission units which carry a pollutant which colorless in the gas or vapor phase. These types of fugitive emission units are excluded from the visible emission observation requirements since they are unable to exceed the opacity limitations in 30 TAC § 111.111(a)(8)(A). To provide consistency with SOPs, this exclusion is reflected in GOP Number 514(b)(5)(E).

To streamline GOP Number 514, figures and equations under 30 TAC § 122.514(b)(7)(G) were not included in GOP Number 514(b)(7). Permit holders are now referenced to Chapter 111 for the figures and equations.

Open burning requirements under 30 TAC § 122.514(b)(7)(H) were moved to GOP Number 514(b)(8) with new site-wide requirements added. These requirements are codified in GOP Number 514(b)(8)(B) and (D) to provide consistency with SOP site-wide requirements, address issues raised by APD staff after the 30 TAC § 122.514 adoption while issuing authorizations to operate, and to allow for greater usage of GOP Number 514.

New site-wide requirements were added in GOP Number 514(b)(9) to address VOC loading/unloading operations at sites located in covered attainment counties affected by Chapter 115, Subchapter C, Division 1. For sites located in a covered attainment county having loading/unloading operations and currently authorized to operate under 30 TAC § 122.514 it may be necessary to obtain a new authorization to operate under GOP Number 514 due to new Chapter 115, Subchapter C, Division 1 applicable requirements. A new authorization to operate may be obtained by revising the GOP application submitted for the site. Although the GOP Number 514(b)(6) site-wide requirement language differs slightly from the SOP site-wide requirement language because of the permit types, the codified applicable requirements are consistent.

New site-wide requirements were added in GOP Number 514(b)(10) to address motor vehicle fuel dispensing facilities at sites located in covered attainment counties affected by Chapter 115, Subchapter C, Division 2 (Filling of Gasoline Storage Vessels [Stage I] for Motor Vehicle Fuel Dispensing Facilities). For sites located in a covered attainment county having motor vehicle fuel dispensing facilities and currently authorized to operate under 30 TAC § 122.514 it may be necessary to obtain a new authorization to operate under GOP Number 514 due to new Chapter 115, Subchapter C, Division 2 applicable requirements. A new authorization to operate may be obtained by revising the GOP application submitted for the site. Although the GOP Number 514(b)(7) site-wide requirement language differs slightly from the SOP site-wide requirement language because of the permit types, the codified applicable requirements are consistent.

New site-wide requirements were added in GOP Number 514(b)(11) to address VOC leaks from transport vessels at sites located in covered attainment counties affected by Chapter 115, Subchapter C, Division 3 (Control of Volatile Organic Compound Leaks From Transport Vessels). For sites located in a covered attainment county having motor vehicle fuel dispensing facilities and currently authorized to operate under 30 TAC § 122.514 it may be necessary to obtain a new authorization to operate under GOP Number 514 due to new Chapter 115, Subchapter C, Division 3 applicable requirements. A new authorization to operate may be obtained by revising the GOP application submitted for the site. Although the GOP Number 514(b)(8) site-wide requirement language differs

slightly from the SOP site-wide requirement language because of the permit types, the codified applicable requirements are consistent.

Permit shields may only be granted for negative applicability to an entire regulation or for a stringency determination and cannot be included in a GOP due to the need for specific provisions identifying emission units and requirements. Therefore, the 30 TAC § 122.514(b)(11) phrase “as long as the provisions are at least as stringent as the following” was changed to “as long as the provisions meet the following minimum requirement” in GOP Number 514(b)(14). Changing the phrase was necessary since the word “stringent” indicates a permit shield under 30 TAC § 122.148 is needed for the custom fuel monitoring schedule allowed in the GOP.

The 30 TAC § 122.514(b)(15) sentence “Compliance with this paragraph . . . in accordance with the Permit Shield provisions in §122.145 of this title” was not included in GOP Number 514(b)(16) since it also referenced a permit shield. Again, permit shields may only be granted for negative applicability to an entire regulation or for a stringency determination and cannot be included in a GOP due to the need for specific provisions identifying emission units and requirements.

The 30 TAC § 122.514(b)(14) site-wide requirement was revised in GOP Number 514(b)(17) to contain text and a sulfur feed rate equation that was originally contained in 30 TAC § 122.511(b)(18). This change will alleviate the need for permit holders to have copies of two separate GOPs and will provide consistency with other GOP Number 511. Based on a comment received during the comment period for GOP Number 514, the provision under GOP Number 514(b)(17) was reformatted for clarity and consistency. Additionally, the phrase “in this test” was added to the end of the sentence “Each batch of stain tubes . . . allowed to reach room temperature at least eight hours before use” since there was concern that it may be necessary to run an emergency analysis and the applicant may not have eight hours to wait. The phrase “test shall be limited to manufacturer’s provided specifications” was also revised to read “tube will comply with stain test manufacturer’s provided accuracy limits” since there was concern that the accuracy of the tube may be a limiting factor.

The 30 TAC § 122.514(b)(16) site-wide requirement was omitted from GOP Number 514. This requirement now resides in 30 TAC § 122.502 (Authorization to Operate).

Since 40 CFR Part 63 (Part 63), Subpart HH (National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities) was recently promulgated by the EPA and potentially affects emission units authorized to operate under GOP Number 514, a site-wide requirement relating to compliance dates was added under GOP Number 514(b)(20). A site-wide requirement was also added in GOP Number 514(b)(19) to address the Part 63, Subpart A (General Provisions) requirements affecting a permit holder when subject to another Part 63 subpart.

As previously mentioned, the commission amended the definition of “applicable requirement” in 30 TAC § 122.10(2), which became effective June 3, 2001. The amended definition added 30 TAC Chapter 101 (Chapter 101), Subchapter H (Emissions Banking and Trading) as an applicable requirement under Chapter 122. However, the emissions banking and trading requirements will only be treated as a site-wide requirement in operating permits. Therefore, since the potential exists for

sites utilizing GOP Number 514 to be subject to the emissions banking and trading requirements, site-wide requirements are included in GOP Number 514(b)(23) - (24).

Section (c) of GOP Number 514 contains permit tables that provide a codification of applicable requirements including regulatory, monitoring, testing, recordkeeping, and reporting requirements for units covered by the GOPs. Additional information relating to site-wide requirements may be found in the APD document entitled “Federal Operating Permit Application Guidance.”

The GOP Number 514 permit tables remain consistent with the draft GOP Number 514 site-wide requirement, with the exception of one new permit table being added due to an inadvertent omission. The GOP Number 514 permit tables are based on the permit tables found in 30 TAC § 122.514. However, permit tables were added to GOP Number 514 to include applicable requirements that may affect emission units operating under the GOP and are discussed below. Several 30 TAC § 122.514 permit tables were also revised or omitted, as discussed below. Appendix B of this document also contains a listing of applicable requirements codified GOP Number 514 permit tables. See Appendix C of this document for a listing of index numbers where codified applicable requirements in 30 TAC § 122.514(c) are changed in GOP Number 514. For sites having emission units associated to one of these index numbers, it may be necessary for owners or operators to obtain a new authorization to operate under GOP Number 514 since applicability determinations and the determination bases affecting the emission units will most likely have changed.

It should be noted that permit tables used for one GOP in Chapter 122, Subchapter F may be referenced in another GOP in the subchapter. For example, 30 TAC § 122.514(c)(1) references the permit table in 30 TAC § 122.511(c)(1) for stationary gas turbines affected by 40 CFR Part 60 (Part 60), Subpart G (Standards of Performance for Stationary Gas Turbines). Since the permit table is not shown in 30 TAC § 122.514, it required permit holders to also have a 30 TAC § 122.511 GOP copy to determine the appropriate index numbers. To alleviate the need for permit holders to have copies of two separate GOPs when completing an application or application revision for GOP Number 514, all the necessary permit tables are incorporated in the GOP. To reduce the number of application revisions, permit tables incorporated in GOP Number 514 from GOP Number 511 will retain the prefix 511. The GOP Number 514 will, therefore, have index numbers with 511 and 514 prefixes. Index numbers having a prefix of 511 should then be used to complete the permit application or application revision for GOP Number 514. Thus, using index numbers having different prefixes is permissible even if the index number prefix is different from the GOP number when completing a permit application or application revision.

Since Part 63, Subpart HH was recently promulgated by the EPA and potentially affects emission units authorized to operate under GOP Number 514 when issued, permit tables were added in GOP Number 514(c)(1) - (3) for storage vessels, glycol dehydration vents, and ancillary equipment (compressors, pumps, pressure relief devices, sampling connection systems, open-ended valves, or lines, valves, flanges, or other connectors), respectively. For sites having these emission units that are subject to Part 63, Subpart HH, it may be necessary for owners or operators to obtain a new authorization to operate under GOP Number 514.

A new permit table was added in GOP Number 514(c)(12) to address VOC loading/unloading operations at sites located in covered attainment counties affected by Chapter 115, Subchapter C, Division 1. For sites located in a covered attainment county having loading/unloading operations and currently authorized to operate under 30 TAC § 122.514 it may be necessary to obtain a new authorization to operate under GOP Number 514 due to new Chapter 115, Subchapter C, Division 1 applicable requirements. A new authorization to operate may be obtained by revising the GOP application submitted for the site.

During the 30 TAC § 122.514 GOP development a permit table for incinerators was not created. After the GOP adoption, it was found that many sites, for which owners or operators were applying to operate under the GOP, had incinerators. These units could not be authorized to operate under the GOP since no applicable requirements for incinerators were codified and a SOP was necessary for the incinerators. To allow greater usage of GOP Number 514, a permit table codifying Chapter 111, Subchapter A, Division 2 (Incineration) requirements has been included in GOP Number 514(c)(5). A permit holder having an authorization to operate under 30 TAC § 122.514 and a SOP for incinerators may keep the separate SOP and GOP authorization to operate. As an option, the permit holder may revise the GOP application to include the incinerators and then void the SOP. A new authorization to operate under GOP Number 514 will then be issued to the permit holder.

Due to an inadvertent omission in the draft GOP Number 514, a permit table was added in GOP Number 514(c)(17) for flares affected by Part 63, Subpart A. This permit table is consistent with the applicable requirement determinations found in the DSS flowcharts for flares affected by Part 63, Subpart A.

HEARING AND COMMENTORS

The public comment and affected state review periods closed September 10, 2001. The EPA review period ended September 24, 2001. Written comments were received from the TxOGA, ONEOK, and Baker Botts. No requests for a public hearing on the draft GOP Number 514 were received.

RESPONSE TO COMMENTS

Comment

TxOGA and Baker Botts commented on TNRCC's plans to incorporate minor NSR permit representations into the Title V permitting program under of 30 TAC §116.116(a)(1). TxOGA and Baker Botts pointed out that the EPA has tried to discourage states from incorporating entire permit applications into Title V permits, and has also stated that only environmentally significant terms should be included in Part 70 permits. TxOGA and Baker Botts are also concerned that incorporating NSR application representations into the Title V permit creates confusion as to the requirements that apply to the source and will unnecessarily limit operational flexibility and trigger great difficulties associated with compliance certification and deviation reporting. TxOGA and Baker Botts believe that TNRCC should restate any portions of the application that constitutes enforceable permit terms or conditions in the Title V permit itself.

Response

The executive director has not changed the GOP in response to this comment since it affects the operating permit program as a whole and would require an amendment to the “applicable requirement” definition in Chapter 122. Since comments were only solicited on the draft GOP, Chapter 122 cannot be amended through this GOP under Texas administrative law since it would require rulemaking that must follow the Administrative Procedures Act (APA). However, the commission will develop guidance regarding incorporation of minor NSR, including which NSR application representations are subject to operating permit compliance certification and deviation reporting.

Comment

TxOGA commented that TNRCC should not reference entire minor NSR permits into Title V permits, but should restate any conditions that constitute enforceable permit terms and conditions in Title V permits. TxOGA pointed out that the EPA’s White Paper specifies that only environmentally significant terms need to be included in Part 70 permits, some NSR permits contain terms that are obsolete, extraneous, environmentally insignificant, or otherwise not required in Part 70 permits, and that some NSR permit terms and conditions may be patently obsolete and no longer relevant to the operation of the source.

Response

The executive director has not changed the GOP in response to this comment since it affects the operating permit program as a whole and cannot be corrected through the GOP. However, the executive director agrees that some minor NSR permits may contain terms and conditions that are environmentally insignificant even though the Chapter 122 applicable requirement definition includes all of these requirements. As previously mentioned in this technical summary, the applicable requirement definition includes all of the requirements under Chapter 106, Subchapter A, or Chapter 116 and any term or condition of any preconstruction permit. To meet the Chapter 122 requirements, the executive director will issue operating permits that reference minor NSR permits. The executive director believes that terms and conditions of minor NSR permits that are obsolete, extraneous, or environmentally insignificant would be more appropriately deleted or changed through the NSR permit process.

Comment

TxOGA and Baker Botts commented that the GOP renewal process is confusing and inconsistent with the intent of the Title V program. TxOGA and Baker Botts also believe the duplicate renewal process, one for the GOP and one for the authorization to operate (ATO) under the GOP, effectively gives the holders of ATOs under the GOPs two to three years of operation before the renewal process starts over. Furthermore, the GOP expiration and the ATO expiration dates will never be the same because it takes approximately 2-3 years to obtain an ATO after the GOP has been issued. TxOGA and Baker Botts request that TNRCC comment on the renewal time lag for GOPs and the holders of ATOs under the GOPs.

Response

The executive director has not changed the GOP in response to this comment since it affects the GOP and ATO renewal process and would require a Chapter 122, Subchapter F amendment. Since comments were only solicited on the draft GOP, Chapter 122 cannot be amended through this GOP under Texas administrative law since it would require rulemaking that must follow the APA.

The executive director disagrees that the GOP renewal process is confusing and inconsistent with the operating permit program intent. Part 70 requires states to issue permits for a period not to exceed five years. Under 30 TAC § 122.501(f) (General Operating Permits) a GOP is required to be renewed by the executive director at least every five years after the effective date and this requirement is consistent with Part 70.

The executive director agrees that the process of having separate GOP and ATO renewal dates is confusing, but is unable to correct the process at this time since it will require a Chapter 122 amendment. The executive director intends to correct this process in the near future. However, until a Chapter 122 amendment can be made to correct the process, the action of renewing an ATO at least every five years from the date of which it was issued, as required by 30 TAC § 122.502(d) (Authorization to Operate) will remain the responsibility of the permit holder.

The executive director also agrees that the GOP and ATO renewal dates will never be the same. However, the executive director does not believe that the renewal processes leave any disruption in coverage while operating under the GOP. Even if an ATO expires, the permit holder may continue to operate under the GOP if a timely and complete renewal application has been submitted. After a timely and complete renewal application is submitted, the permit holder may continue to operate under the terms and conditions of the previous ATO until the new ATO is granted or denied. The ATO terms and conditions require the updating of applications for changes at the site. This requirement, in addition to the requirement to update GOP applications any time a GOP is revised and the revision affects emission units at the site, ensures that the permit holders are maintaining their sites in accordance with current regulations and is independent of the GOP renewal.

Comment

TxOGA and Baker Botts commented that the draft GOPs include revisions to applicable requirements, as well as new applicable requirements (i.e., minor NSR). TxOGA and Baker Botts requested clarification regarding whether the revision to include codified applicable requirements to the GOPs is a significant revision, minor revision, or administrative revision. In addition, TxOGA and Baker Botts requested clarification regarding whether the revision to include new applicable requirements (minor NSR terms and conditions) is a significant revision, minor revision, or administrative revision. Furthermore, TxOGA and Baker Botts requested clarification regarding whether the current public notice and comment period for the GOPs is a result of the revision process or a result of the nonrule GOP.

Response

The executive director would like to clarify that **GOP application revisions** to include new or revised applicable requirements are not classified on the basis of significant, minor, or administrative revisions. All GOP application revisions should be handled in accordance with 30 TAC § 122.504 (Application Revisions When an Applicable Requirement or State-Only Requirement is Promulgated or Adopted or a General Operating Permit is Revised or Rescinded).

The executive director would also like to clarify that **GOP revisions** are an action undertaken by the executive director. At the time the GOP is revised, the executive director will make a determination on the appropriate revision process to be used based on the types of changes to the GOP. For example, a revised GOP may contain a revision to a codified applicable requirement and could be classified as a minor revision. However, the executive director may choose to revise the GOP under the significant revision process in order to receive as much input as possible from the public notice and comment period, affected state review, EPA review, and public petition period. It is also possible that a GOP revision could be subject to multiple revision processes at once. For example, a GOP may be revised to correct a typographical error, an administrative revision. The revised GOP may also contain a revision to a codified applicable requirement subject to the minor revision process and a new applicable requirement subject to the significant process. In this case the executive director would use the significant revision process to revise the GOP.

For this GOP, the public notice and comment period is the result of both the renewal and revision requirements. Under 30 TAC § 122.243 (Permit Renewal Procedures) a permit may only be renewed by the executive director if the requirements for public notice, notice and comment hearing, affected state review, EPA review, and public petition have been satisfied. Additionally, since the GOP contained new and revised applicable requirements, the executive director elected to use the significant revision process to revise the GOP, which also includes the requirements for public notice, notice and comment hearing, affected state review, EPA review, and public petition.

Comment

TxOGA and Baker Botts requested that TNRCC clarify if the agency is issuing a new GOP, as indicated in the preamble to the May 2001 amendments to 30 TAC Chapter 122, or if the agency is revising/renewing an existing GOP.

Response

The executive director would like to clarify that **this GOP is not a new GOP** as indicated in the May 2001 Chapter 122 amendment preamble. Because of programmatic issues that arose with instituting proceedings to reopen previously approved ATOs after the preamble was written, the executive director elected not to issue new GOPs. Instead, the executive director is issuing **GOP Number 514** to fulfill the obligation to renew the oil and gas GOP in 30 TAC § 122.514. As previously mentioned, **GOP Number 514** will also contain new and revised applicable requirements as a result of amended regulations or the adoption of new regulations.

Comment

TxOGA and Baker Botts commented that they believe the TNRCC should consider administratively extending the current GOPs until new ATOs can be issued for the proposed non-rule GOPs.

Response

The executive director is unable to administratively extend a GOP since Chapter 122 does not allow for extensions, of any sort, to the five-year GOP term. Specifically, 30 TAC §122.501(f) requires that a GOP must be renewed at least every five years after the effective date.

Comment

TxOGA and Baker Botts requested that the TNRCC confirm that holders of ATOs under the GOPs have the option (1) to apply for the new GOPs, or (2) to submit an application for a SOP. TxOGA and Baker Botts also requested confirmation that, in either case, the applicant will then be covered by an application shield until the new ATO or SOP is issued.

Response

The executive director would like to clarify that the holder of an ATO (permit holder) has the option to remain operating under the GOP or to submit an application for a SOP. Although Chapter 122 does not clearly address the procedures for changing from being authorized to operate under a GOP to a SOP, it does indicate that full SOP applications must be received for each site. Under 30 TAC §122.130 (Initial Application Due Dates) abbreviated applications may only be submitted by owners or operators of: 1) any site required to obtain an operating permit on February 1, 1998; 2) a new site required to obtain an operating permit after February 1, 1998; and 3) an existing site required to obtain an operating permit as the result of a change at the site. Therefore, current permit holders are unable to meet the 30 TAC § 122.130 criteria and full SOP applications should be submitted when converting from GOP authorizations to operate.

Additionally, the permit holder should continue to comply with the ATO until a SOP is issued since Chapter 122 does not provide an application shield for this situation. The application shield provisions under 30 TAC § 122.138 provide that before final action is taken on an application for initial permit issuance, renewal, or a GOP, failure to have a permit is not a violation provided a timely and complete application has been submitted. The applications to convert to SOPs could not be treated as initial permit issuances and would be ineligible for an application shield since permit holders currently have ATOs. Further, until a SOP is issued, the ATOs should not be voided or allowed to lapse. The GOP application revisions, authorization to operate renewals, deviation reports, and annual compliance certifications should also continue until the SOP is issued and the ATOs are voided.

Comment

ONEOK Field Services commented on draft Oil and Gas GOP Number 514(b)(17) and requested reformatting of the paragraphs in order to clarify the monitoring provisions that apply only to sweetening units that operate at greater than or equal to 2.0 long tons per day (LTPD).

Response

The executive director agrees with the comment and has reformatted GOP Number 514(b)(17). The change will also be made in GOP Number 511(b)(25), GOP Number 512(b)(20), and GOP Number 513(b)(20) for consistency.

Comment

ONEOK Field Services commented on draft Oil and Gas GOP Number 514(b)(17) and requested the insertion of the words “in this test” because they are concerned that there may be times during the month when we may find it necessary to run an emergency analysis and may not have the eight hours to wait.

Response

The executive director agrees with the comment and added the phrase “in this test” to the end of the sentence “Each batch of stain tubes . . . allowed to reach room temperature at least eight hours before use” since there was concern that it may be necessary to run an emergency analysis and the applicant may not have eight hours to wait. The change will also be made in GOP Number 511(b)(25), GOP Number 512(b)(20), and GOP Number 513(b)(20) for consistency.

Comment

ONEOK Field Services commented on draft Oil and Gas GOP Number 514, Provision (a)(17) and requested the replacement of the words “test shall be limited to manufacturer’s provided specifications” with “tube will comply with stain test manufacturer’s provided accuracy limits” because they are concerned that the accuracy of the tube may be the limiting factor.

Response

The executive director agrees with the comment and added the phrase “test shall be limited to manufacturer’s provided specifications” was also revised to read “tube will comply with stain test manufacturer’s provided accuracy limits” since there was concern that the accuracy of the tube may be a limiting factor. The change will also be made in GOP Number 511(b)(25), GOP Number 512(b)(20), and GOP Number 513(b)(20) for consistency.

APPENDIX A
SITE-WIDE REQUIREMENTS

In addition to requirements relating to Chapter 122 requirements and NSR authorizations, GOP Number 514(b) codifies site-wide requirements relating to:

- Chapter 101, Subchapter A, Division 4 (Discrete Emission Credit Banking and Trading);
- Chapter 111, Subchapter A, Division 1 (Visible Emissions);
- C Chapter 111, Subchapter A, Division 3 (Abrasive Blasting of Water Storage Tanks Performed by Portable Operations);
- C Chapter 111, Subchapter A, Division 4 (Materials Handling, Construction, Roads, Streets, Alleys, and Parking Lots);
- C Chapter 111, Subchapter A, Division 5 (Emission Limits on Nonagricultural Processes);
- C Chapter 111, Subchapter B (Outdoor Burning);
- C Chapter 115, Subchapter C, Division 1 (Loading and Unloading of Volatile Organic Compounds);
- C Chapter 115, Subchapter C, Division 2 (Filling of Gasoline Storage Vessels [Stage I] for Motor Vehicle Fuel Dispensing Facilities);
- C Chapter 115, Subchapter C, Division 3 (Control of Volatile Organic Compound Leaks From Transport Vessels);
- C Part 60, Subpart A (General Provisions);
- C Part 60, Subpart GG (Standards of Performance for Stationary Gas Turbines);
- C Part 60, Subpart LLL (Standards of Performance for Onshore Natural Gas Processing: SO₂ Emissions);
- C Part 61, Subpart J (National Emission Standard for Equipment Leaks [Fugitive Emission Sources] of Benzene);
- C Part 63, Subpart A (General Provisions);
- C Part 63, Subpart HH (National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities);
- C Part 82 (Protection of Stratospheric Ozone); and
- C Part 68 (Chemical Accident Prevention Provisions [Risk Management Plans]).

APPENDIX B

PERMIT TABLE APPLICABLE REQUIREMENTS

Permit tables in GOP Number 514(c) codify applicable requirements for emission units. The following table identifies applicable requirements codified in GOP Number 514 for the emission unit types.

Emission Unit Type	Applicable Requirement Permit Table
Stationary Gas Turbines	Part 60, Subpart GG
Storage Vessels	Part 60, Subparts K (Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978) and Ka (Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984)
	Part 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984)
	Part 63, Subpart HH
Gas Sweetening Units Not Utilizing Sulfur Recovery	Part 60, Subpart LLL
Fugitive Emissions	Part 60, Subpart KKK (Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants)
	Part 63, Subpart HH
Flares	Part 60, Subpart A
	Chapter 111, Subchapter A, Division 1
Gas Sweetening Units Utilizing Sulfur Recovery	40 CFR 60, Subpart LLL
	Chapter 112 (Control of Air Pollution from Sulfur Compounds)
Stationary Vents	Chapter 111, Subchapter A, Division 1
Boilers/Steam Generators	40 CFR 60, Subparts Db (Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units) and Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units)
VOC Loading Operations	Chapter 115, Subchapter C, Division 1
Incinerators	Chapter 111, Subchapter A, Division 2
Glycol Dehydrators	Part 63, Subpart HH

APPENDIX C

INDEX NUMBER CHANGES

Index No.	Existing Requirements (GOPs effective 10/96)			GOP Number 514 Requirements		
	Regulatory Requirement [Exemption]	Monitoring and Testing	Recordkeeping and Reporting	Regulatory Requirement [Exemption]	Monitoring and Testing	Recordkeeping and Reporting
511-05-008	§60.332(a)(2),(3) §60.334(c)(1),(2) §60.333(b)	§60.334(b),(b)(2),(c)(1),(2),(4) §60.335(a),(b),(c)(1),(3),(d)-(e)	§60.334(b)(2),(c)(1),(2),(4)	§60.332(a)(2),(3) §60.333(b)	§60.334(b),(b)(2),(c)(1),(2) §60.335(a),(b),(c)(1),(3),(d)-(e)	§60.334(b)(2),(c)(1),(2)
511-05-012	§60.332(a)(2),(3),(f) §60.333(b) §60.334(c)(1),(2)	§60.334(a) §60.334(b),(b)(2),(c)(1)-(3) §60.335	§60.334(a),(b)(2),(c)(1)-(3)	§60.332(a)(2),(3),(f) §60.333(b)	§60.334(a) §60.334(b),(b)(2),(c)(1)-(3) §60.335(a),(b),(c)(1)-(3),(d),(e)	§60.334(a),(b)(2),(c)(1)-(3)
511-05-015	§60.332(a)(2),(3),(f) §60.333(b) §60.334(c)(1),(2)	§60.334(a) §60.334(b),(b)(2),(c)(1)-(3) §60.335	§60.334(a),(b)(2),(c)(1)-(3)	§60.332(a)(2),(3),(f) §60.333(b)	§60.334(a) §60.334(b),(b)(2),(c)(1)-(3) §60.335(a),(b),(c)(1)-(3),(d),(e)	§60.334(a),(b)(2),(c)(1)-(3)
511-07-012	§60.112b(a)(3) §60.18	§60.113b(d) §60.116b(a),(b),(e)	§60.115b,(d) §60.116b(a),(b),(e)(2)(ii)	§60.112b(a)(3) §60.18	§60.113b(d) §60.116b(a),(b),(e) §60.485(b)	§60.115b,(d) §60.116b(a),(b),(e)(2)(ii)
511-07-013	§60.112b(a)(3)	§60.113b(c) §60.116b(a),(b),(e)	§60.113b(c)(1) §60.115b,(c) §60.116b(a),(b),(e)(2)(ii)	§60.112b(a)(3)	§60.113b(c) §60.116b(a),(b),(e) §60.485(b)	§60.113b(c)(1) §60.115b,(c) §60.116b(a),(b),(e)(2)(ii)
511-07-017	§60.112b(a)(3) §60.18	§60.113b(d) §60.116b(a),(b),(e)	§60.115b,(d) §60.116b(a),(b),(e)(2)(ii)	§60.112b(a)(3) §60.18	§60.113b(d) §60.116b(a),(b),(e) §60.485(b)	§60.115b,(d) §60.116b(a),(b),(e)(2)(ii)
511-07-018	§60.112b(a)(3)	§60.113b(c) §60.116b(a),(b),(e)	§60.113b(c)(1) §60.115b,(c) §60.116b(a),(b),(e)(2)(ii)	§60.112b(a)(3)	§60.113b(c) §60.116b(a),(b),(e) §60.485(b)	§60.113b(c)(1) §60.115b,(c) §60.116b(a),(b),(e)(2)(ii)
511-10-004	§60.632(a) §60.633(d) §60.482-1(a),(b) §60.482-2 §60.482-9	§60.632(d) §60.632(f) §60.633(h) §60.485(a),(b),(c),(d)(2)-(3),(e),(f)	§60.632(e) §60.635(a) §60.636(a) §60.486(a),(b),(c),(e),(h),(k) §60.487(a),(b),(c),(e)	§60.632(a) §60.633(d) §60.482-1(a),(b) §60.482-2 §60.482-9	§60.632(d) §60.633(h) §60.482-2 §60.485(a),(b),(c),(d),(2),(3),(e),(f)	§60.632(e) §60.635(a) §60.636 §60.486(a),(b),(c),(e),(1),(2),(4),(h),(k) §60.487(a),(b),(c),(e)
511-10-005	§60.632(a) §60.482-1(a),(b) §60.482-8 §60.482-9	§60.632(d) §60.632(f) §60.633(h) §60.485(a),(b),(d)(2)-(3),(e),(f)	§60.632(e) §60.635(a) §60.486(a),(b),(c),(e),(k) §60.487(a),(b),(c),(e)	§60.632(a) §60.482-1(a),(b) §60.482-8 §60.482-9	§60.632(d) §60.633(h) §60.482-8 §60.485(a),(b) §60.485(a),(b),(d),(2),(3),(e),(f)	§60.632(e) §60.635(a) §60.636 §60.486(a),(b),(c),(e),(1),(k) §60.487(a),(b),(c),(e)
511-10-006	§60.633(f)	None	§60.635(c) §60.486(j)	§60.633(f)	None	§60.635(a),(c) §60.486(j)
511-10-007	§60.632(a) §60.482-1(a),(b) §60.482-3 §60.482-9	§60.632(d) §60.632(f) §60.633(h) §60.485(a),(b),(c),(d)(2)-(3),(e),(f)	§60.632(e) §60.635(a) §60.636(a) §60.486(a),(b),(c),(e),(h),(k) §60.487(a),(b),(c),(e)	§60.632(a) §60.482-1(a),(b) §60.482-3 §60.482-9	§60.632(d) §60.633(h) §60.482-3 §60.485(a),(b),(c),(d),(2),(3),(e),(f)	§60.632(e) §60.635(a) §60.636 §60.486(a),(b),(c),(e),(1),(2),(4),(h),(k) §60.487(a),(b),(c),(e)

Index No.	Existing Requirements (GOPs effective 10/96)			GOP Number 514 Requirements		
	Regulatory Requirement [Exemption]	Monitoring and Testing	Recordkeeping and Reporting	Regulatory Requirement [Exemption]	Monitoring and Testing	Recordkeeping and Reporting
511-10-008	§60.632(a) §60.633(b),(d) §60.482-1(a),(b) §60.482-4 §60.482-9	§60.632(d) §60.632(f) §60.633(h) §60.485(a),(b),(c),(d)(2)-(3),(f)	§60.632(e) §60.635(a),(b) §60.636 §60.486(a),(e),(k) §60.487(a),(b),(c),(e)	§60.632(a) §60.633(b)(1)-(4),(d) §60.482-1(a),(b) §60.482-4 §60.482-9	§60.632(d) §60.633(h) §60.482-4 §60.485(a),(b),(c),(d),(2),(3),(f)	§60.632(e) §60.635(a),(b) §60.636 §60.486(a),(e),(1),(3),(4),(k) §60.487(a),(b),(c),(e)
511-10-009	§60.632(a) §60.482-1(a),(b) §60.482-8 §60.482-9	§60.632(d) §60.632(f) §60.633(h) §60.485(a),(b),(d)-(f)	§60.632(e) §60.635(a) §60.636(a) §60.486(a),(b),(c),(e),(j),(k) §60.487(a),(b),(c),(e)	§60.632(a) §60.482-1(a),(b) §60.482-8 §60.482-9	§60.632(d) §60.633(h) §60.482-8 §60.485(a),(b) §60.485(a),(b),(d),(2),(3),(e),(f)	§60.632(e) §60.635(a) §60.636 §60.486(a),(b),(c),(e),(1),(k) §60.487(a),(b),(c),(e)
511-10-011	§60.632(a) §60.482-1(a),(b) §60.482-6 §60.482-9	§60.632(d) §60.632(f) §60.633(h) §60.485(a),(b),(d)-(f)	§60.632(e) §60.635(a) §60.636(a) §60.486(a),(e),(k) §60.487(a),(b),(c),(e)	§60.632(a) §60.482-1(a),(b) §60.482-6 §60.482-9	§60.632(d) §60.633(h) §60.485(a),(b),(d),(2),(3),(f)	§60.632(e) §60.635(a) §60.636 §60.486(a),(e),(1),(k) §60.487(a),(b),(c),(e)
511-10-012	§60.632(a),(b) §60.633(d) §60.482-1(a),(b) §60.482-7 §60.482-9 §60.483-1 §60.483-2	§60.632(d) §60.632(f) §60.633(h) §60.485	§60.632(e) §60.635(a) §60.636(a) §60.486(a)-(c),(e)-(g),(j),(k) §60.487	§60.632(a),(b) §60.633(d) §60.482-1(a),(b) §60.482-7 §60.482-9 §60.483-1 §60.483-2	§60.632(d) §60.633(h) §60.482-7 §60.483-1 §60.485(a),(b),(c),(d),(2),(3),(e),(f)	§60.632(e) §60.635(a) §60.636 §60.486(a),(b),(c),(e),(1),(2),(4),(f),(g),(k) §60.487(a),(b),(c),(d),(e)
511-10-013	§60.632(a) §60.482-1(a),(b) §60.482-8 §60.482-9	§60.632(d) §60.632(f) §60.633(h) §60.485(a),(b),(d)-(f)	§60.632(e) §60.635(a) §60.636(a) §60.486(a),(b),(c),(e),(j),(k) §60.487(a),(b),(c),(e)	§60.632(a) §60.482-1(a),(b) §60.482-8 §60.482-9	§60.632(d) §60.633(h) §60.482-8 §60.485(a),(b) §60.485(a),(b),(d),(2),(3),(e),(f)	§60.632(e) §60.635(a) §60.636 §60.486(a),(b),(c),(e),(1),(k) §60.487(a),(b),(c),(e)
511-10-014	§60.632(a) §60.482-1(a),(b) §60.482-8 §60.482-9	§60.632(d) §60.632(f) §60.633(h) §60.485(a),(b),(d)-(f)	§60.632(e) §60.635(a) §60.636(a) §60.486(a),(b),(c),(e),(j),(k) §60.487(a),(b),(c),(e)	§60.632(a) §60.482-1(a),(b) §60.482-8 §60.482-9	§60.632(d) §60.633(h) §60.482-8 §60.485(a),(b) §60.485(a),(b),(d),(2),(3),(e),(f)	§60.632(e) §60.635(a) §60.636 §60.486(a),(b),(c),(e),(1),(k) §60.487(a),(b),(c),(e)
511-10-015	§60.632(a) §60.633(g) §60.18 §60.482-1(a),(b) §60.482-9 §60.482-10	§60.632(d) §60.632(f) §60.633(h) §60.485(a)-(d),(f),(g)	§60.632(e) §60.635(a) §60.636(a) §60.486(a),(d),(e),(j),(k) §60.487(a),(b),(c),(e)	§60.632(a) §60.633(g) §60.18 §60.482-1(a),(b) §60.482-10	§60.632(d) §60.633(h) §60.485(a),(b),(c),(d),(2),(3),(f),(g)	§60.632(e) §60.635(a) §60.636 §60.486(a),(d),(e),(1),(k) §60.487(a),(b),(c),(e)
511-10-016	§60.632(a) §60.482-1(a),(b) §60.482-9 §60.482-10	§60.632(d) §60.632(f) §60.633(h) §60.485(a)-(d),(f),(g)	§60.632(e) §60.635(a) §60.636(a) §60.486(a),(d),(e),(j),(k) §60.487(a),(b),(c),(e)	§60.632(a) §60.482-1(a),(b) §60.482-10	§60.632(d) §60.633(h) §60.485(a),(b),(c),(d),(2),(3),(f),(g)	§60.632(e) §60.635(a) §60.636 §60.486(a),(d),(e),(1),(k) §60.487(a),(b),(c),(e)
511-12-002	§60.18(b),(c)(1)-(3), (4)(i),(6),(e),(f)(1)	§60.18(d),(f)(1)-(4)	None	§60.18(b),(c)(1),(2), (3)(ii),(4)(i),(6),(e)	§60.18(d),(f)(1)-(4)	None

Index No.	Existing Requirements (GOPs effective 10/96)			GOP Number 514 Requirements		
	Regulatory Requirement [Exemption]	Monitoring and Testing	Recordkeeping and Reporting	Regulatory Requirement [Exemption]	Monitoring and Testing	Recordkeeping and Reporting
511-12-003	§60.18(b),(c)(1)-(3), (4)(iii),(6),(e),(f)(1)	§60.18(d),(f)(1)-(5)	None	§60.18(b),(c)(1),(2), (3)(ii),(4)(iii),(6),(e)	§60.18(d),(f)(1)-(5)	None
511-12-004	§60.18(b),(c)(1)-(3), (4)(ii),(6),(e),(f)(1)	§60.18(d),(f)(1)-(4)	None	§60.18(b),(c)(1),(2), (3)(ii),(4)(ii),(6),(e)	§60.18(d),(f)(1)-(4)	None
511-12-005	§60.18(b),(c)(1)-(3), (c)(4)(i),(c)(6),(e), (f)(1)	§60.18(d),(f)(1)-(4)	None	§60.18(b),(c)(1),(2), (3)(ii),(6),(e)	§60.18(d),(f)(1)-(4)	None
511-12-006	§60.18(b),(c)(1)-(3), (4)(iii),(6),(e),(f)(1)	§60.18(d),(f)(1)-(5)	None	§60.18(b),(c)(1),(2), (3)(ii),(4)(iii),(6),(e)	§60.18(d),(f)(1)-(5)	None
511-12-007	§60.18(b),(c)(1)-(3), (4)(ii),(6),(e),(f)(1)	§60.18(d),(f)(1)-(4)	None	§60.18(b),(c)(1),(2), (3)(ii),(4)(ii),(6),(e)	§60.18(d),(f)(1)-(4)	None
511-12-008	§60.18(b),(c)(1)-(3), (5),(6),(e),(f)(1)	§60.18(d),(f)(1)-(4),(6)	None	§60.18(b),(c)(1),(2), (3)(ii),(5),(6),(e)	§60.18(d),(f)(1)-(3),(6)	None
511-13-002	§111.111(a)(1)(B),(C)	§111.111(a)(1)(D),(F)(i)-(iii)	§111.111(a)(1)(C)-(D)	§111.111(a)(1)(B),(C), (E),(4)(A)	§111.111(a)(1)(D),(F)(i)-(iii)	§111.111(a)(1)(C)-(D)
511-13-003	§111.111(a)(1)(A),(C)	§111.111(a)(1)(D),(F)(i)-(iii)	§111.111(a)(1)(C)-(D)	§111.111(a)(1)(A),(C), (E),(4)(A)	§111.111(a)(1)(D),(F)(i)-(iii)	§111.111(a)(1)(C)-(D)
511-13-004	§111.111(a)(1)(C)	§111.111(a)(1)(F)(i)-(iii)	None	§111.111(a)(1)(C),(E), (4)(A)	§111.111(a)(1)(F)(i)-(iii)	None
511-13-005	§111.111(a)(1)(B)	§111.111(a)(1)(F)(i)-(iii)	None	§111.111(a)(1)(B),(E), (4)(A)	§111.111(a)(1)(F)(i)-(iii)	None
511-13-006	§111.111(a)(1)(A)	§111.111(a)(1)(F)(i)-(iii)	None	§111.111(a)(1)(A),(E), (4)(A)	§111.111(a)(1)(F)(i)-(iii)	None