September 22, 2023

MR JEFFREY ROBINSON

BRANCH CHIEF AIR PERMITS AND MONITORING

US ENVIRONMENTAL PROTECTION AGENCY REGION 6

1201 ELM ST STE 500

DALLAS TX 75270

Re: Executive Director’s Response to EPA Order

Minor Revision

Permit Number: O1541

Blanchard Refining Company LLC

Galveston Bay Refinery

Texas City, Galveston County

Regulated Entity Number: RN102535077

Customer Reference Number: CN604166868

Dear Mr. Robinson:

On August 8, 2021, the U.S. Environmental Protection Agency (EPA) Region 6 Office signed a letter identifying objections to the issuance of the proposed federal operating permit O1541 for the above referenced site in response to a petition filed on April 11, 2017. In accordance with Title 30 Texas Administrative Code § 122.360 (30 TAC § 122.360), the Texas Commission on Environmental Quality (TCEQ) shall resolve any objection and revise the permit if necessary.

EPA objections are addressed in a pending permit minor revision application (FOP O1541/Project 30965) that was submitted on August 3, 2020. The TCEQ has completed a technical review and offers the enclosed responses to facilitate resolution of the objections. The TCEQ has completed a technical review and offers the enclosed responses to facilitate resolution of the objections. In addition, the attached responses to the objections describe the changes, if applicable, that have been made to the proposed permit and supporting statement of basis (SOB). The proposed permit and SOB are attached for your review.

The public announcement period will begin September 26, 2023, and end October 26, 2023. In addition, if no comments are received, the EPA review period will run concurrent with the announcement and will end on November 10, 2023. If comments are received, you will be notified.

Consistent with 30 TAC §122.350, please notify the TCEQ that the EPA will not further object to the issuance of the permit and concurs resolution of the prior objections as soon as possible. If the EPA does not notify the TCEQ or file any further objections to the proposed FOP during the 45-day review period, the TCEQ will consider the objections resolved and issue the FOP.

Thank you for your cooperation in this matter. If you have any other questions, please contact Ms. Camilla Widenhofer at (512) 239-1028.

Sincerely,



Samuel Short, Deputy Director

Air Permits Division

Office of Air

Texas Commission on Environmental Quality

cc: Ms. Shela M. Leavings, HES Professional, Blanchard Refining Company LLC, Texas City

 Director of Environmental Health Programs, Air and Water Pollution Services, Galveston County Health District, La Marque

 Air Section Manager, Region 12 - Houston

Air Permit Section Chief, U.S. Environmental Protection Agency, Region 6-Dallas (Electronic copy)

Enclosure: TCEQ Executive Director’s Response to EPA Order

Proposed Permit

Statement of Basis

Project Number:  30965

Modifications Made from the Draft to the Proposed Permit

* Added, “(including the terms and conditions which include monitoring, recordkeeping, and reporting identified in registered PBRs and permits by rule identified in the PBR Supplemental Tables dated November 15, 2021, in the application for project 30965)” to term and condition 30
* Removed PBR 106.261 from Unit ID T280-1045
* Added registration number 104884 for PBR 106.478 for Unit ID T280-106
* Added registration number 83759 for PBR 106.478 for Unit ID T280-270
* Added registration number 140391 for PBR 106.478 for Unit ID T280-33A
* Added registration number 151206 for PBR 106.261 for Unit IDs T280-531 and T280-535
* Added registration number 98820 for PBRs 106.261 and 106.478 for Unit ID TK-SM1001
* Removed Unit TNT185 from the permit as the unit is no longer in service
* Added registration number 156183 for PBRs 106.261 and 106.262 for Unit ID ARU-FUG1
* Added registration number 156208 for PBRs 106.261 and 106.262 for Unit ID ENVFC-FUG1
* Added registration number 164268 for PBRs 106.261 and 106.262 for Unit IDs TCH-6 and ALKY3-FUG1
* Added registration number 164572 for PBRs 106.261 and 106.262 for Unit IDs PS2-FUG; UU3-FUG1; ULC-FUG1; REF-FUG; REFDOCKFUG; SRU-FUG1; DDU-FUG1; CFHU-FUG1; RHU-FUG1
* Added registration number 164573 for PBR 106.261 for Unit ID ENVFC-FUG1
* Added registration number 164575 for PBR 106.261 for Unit IDs Alky2-FUG1 and ALKY3-FUG1
* Added registration number 164597 for PBRs 106.261 and 106.262 for Unit ID UU4-FG1
* Added registration number 164598 for PBR 106.261 for Unit IDs PS3A-FUG1 and PS3B-FUG1
* Added registration number 164599 for PBR 106.261 for Unit ID COKR-FUG1
* Added registration number 164600 for PBRs 106.261 and 106.262 for Unit ID AU2-FUG
* Added registration number 164601 for PBR 106.261 for Unit ID ARU-FUG1
* Added registration number 165267 for PBRs 106.261 and 106.478 for ARU-FUG1 and REF-FUG
* Removed Unit ID TK-F620 from the permit as it is no longer in service.
* Removed Authorization SE 86 and Unit ID T280-536 from the permit as the unit is no longer in service;
* Removed Authorization SE 107 and Unit ID DEGREASER08 from the permit as the unit is no longer in service.
* Removed PBR 106.473 and Unit ID VEHGASTK from the permit. This was a temporary tank and is no longer on site. Unit ID VEH GAS TK remains in the permit;
* Removed T280-61 and T280-63 from the permit as these units are no longer in service;
* Low level citations have been added in the Title V permit Applicable Requirements Summary table for all units;
* Periodic monitoring was added to units CFHU-101B, CFHU-102B, COKR-B302, DDU-101B, DDU-102B, DDU-201B, DDU-202B, DDU-B301, DDU-B302, NDU1, PS3B-402BE, PS3B-402BF, PS3B-402BG, RDU-601B, RHU-201B, RHU-202B, RHU-301B, RHU-302B, RHU-401B, RHU-402B, ULC-100B, ULC-101B, ULC-102B, UU3-307BA, UU3-307BB, and UU3-308B for 30 TAC Chapter 117.310(C)(1) for CO.

**Executive Director’s Response to EPA Objection**

**Permit Number O1541**

The Texas Commission on Environmental Quality (TCEQ) Executive Director (ED) provides this Response to EPA’s Objection to the minor revision of the Federal Operating Permit (FOP) for Blanchard Refining Company LLC, Galveston Bay Refinery, Permit No. O1541, Galveston County, Texas.

**Background**

Procedural Background

The Texas Operating Permit Program requires that owners and operators of sites subject to 30 Tex. Admin. Code (TAC) Chapter 122 obtain a FOP that contains all applicable requirements to facilitate compliance and improve enforcement. The FOP does not authorize construction or modifications to facilities, and it does not authorize emission increases. To construct or modify a facility, the responsible party must have the appropriate new source review authorization. If the site is subject to 30 TAC Chapter 122, the owner or operator must submit a timely FOP application for the site and ultimately must obtain the FOP to operate. Blanchard Refining Company LLC applied to the TCEQ for a minor revision of the FOP for the Galveston Bay Refinery located in Texas City, Galveston County on August 3, 2020, and the public announcement period ended on July 29, 2021.

EPA objections are addressed in a pending permit minor revision application (FOP O1541/Project 30965) that was submitted on August 3, 2020. The TCEQ has completed a technical review and offers the enclosed responses to facilitate resolution of the objections. The TCEQ has completed a technical review and offers the enclosed responses to facilitate resolution of the objections. In addition, the attached responses to the objections describe the changes, if applicable, that have been made to the proposed permit and supporting statement of basis (SOB). The proposed permit and SOB are attached for your review.

In accordance with state and federal rules, the permit minor revision may not be issued until TCEQ resolves EPA’s objections.

Description of Site

Blanchard Refining Company LLC owns and operates the Galveston Bay Refinery, located at 2401 5th Ave S in Texas City, Galveston Texas 77590-8349., consists of 19 major production areas, a wastewater treatment facility, a tank farm for the storage of raw materials and products, and a marine loading facility used to transport material to and from marine vessels and the Galveston Bay Refinery site. The facility is a major source of volatile organic compounds (VOC), sulfur dioxide, particulate matter **(**PM**),** nitrogen oxides (NOx), hazardous air pollutants, and carbon monoxide (CO), and is subject to title V of the CAA. Emission units within the facility are also subject to the PSD program, other preconstruction permitting requirements, and various New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP).

The following responses follow the Direction to TCEQ used in EPA’s objection letter.

#### Claim A: The Petitioners Claim that "the Proposed Permit's Incorporation of Blanchard's State-Only Major Source Flexible Permit and Texas's Federally­ Approved Minor Source Flexible Permit Rules Fails to Assure Compliance with Applicable Requirements in the Texas State Implementation Plan."

**Claim B: The Petitioners Claim That "The Proposed Permit Fails to Establish a Schedule for Blanchard to Obtain a SIP-Approved Major Source Permit for Projects Authorized by State-Only Flexible Permit No. 47256/PSDTX402M4/N258/GHGPSDTX116."**

**EPA Direction to TCEQ:** In order to resolve the EPA's objection to Claim A, TCEQ must revise the Title V permit to either designate the current version of Permit No. 47256/PSDTX402M4/N258/GHGPSDTX116 as a non-federally enforceable authorization per 40 C.F.R. § 70.6(b)(2), or it must incorporate a SIP-approved, federally enforceable version of Permit No. 47256/PSDTX402M4/N258/GHGPSDTX116 into the title V permit. If TCEQ elects the latter approach, the EPA encourages TCEQ to prioritize the prompt issuance of a SIP-approved flexible permit to Blanchard, as the EPA's objection will not be resolved until such a permit is issued and the title V permit is revised to incorporate it.

**TCEQ Responses to Claims A and B:**

As directed by EPA, the proposed permit (PP) at page 1012 incorporates SIP-approved NSR Permit Numbers 47256/PSDTX402M4/N258/GHGPSDTX116, effective 09/05/2023, revised NSR Permits 19599/PSDTX023 effective 08/24/2023, and NSR Permits 2231 and 22107, effective 02/11/2022.

**Claim C: The Petitioner Claims That the Proposed Permit Fails to Identify, Incorporate, and Assure Compliance with all Requirements in Permits by Rule Claimed by Blanchard.**

**EPA Direction to TCEQ:** The EPA understands that TCEQ has begun a process to clarify which PBRs only apply to insignificant units at all facilities as their title V permits are renewed or revised. For example, in the statement of basis accompanying the pending revision to Blanchard's Title V permit, TCEQ noted that the following PBRs apply only to insignificant units: 30 TAC§§ 106.102, 106.122, 106.141, 106.143, 106.148, 106.149, 106.161, 106.162, 106.163, 106.229, 106.241, 106.242, 106.243, 106.244, 106.266, 106.301, 106.313, 106.316, 106.317, 106.318, 106.319, 106.331, 106.333, 106.372, 106.391, 106.394, 106.414, 106.415, 106.431, 106.432, 106.451, 106.453, 106.471, 106.531. *See e.g.,* Statement of Basis for Draft Permit No. 01541 at 7-8 (June 25, 2021). To the extent any PBRs in the Blanchard Title V permit apply only to insignificant units, such changes would likely satisfy the requirements of the CAA and TCEQ's approved program.

For the remaining PBRs that do not apply only to insignificant units, TCEQ must explain to which emission units the PBRs identified in the Petition (and which still remain in the Title V permit) apply. To accomplish this, TCEQ could update the Title V permit and list these PBRs next to the applicable emission units in the New Source Review Authorization References by Emission Unit table.

#### Claim D: The Petitioners Claim that the Proposed Permit Fails to Assure Compliance with Emission Limits and Operating Requirements Established by Blanchard’s New Source Review Permits, Including Permits by Rule.

#### Claim D.1: Monitoring Associated with PBRs

#### EPA direction to TCEQ: as explained with respect to Claim C, the EPA notes that TCEQ has begun including a list of PBRs that only apply to insignificant units in the statement of basis for Title V permits, including in the statement of basis accompanying the draft minor revision to Blanchard's Title V permit. *See* statement of basis for draft permit no. O1541 at 7-8, 331. (June 25, 2021). To the extent that any PBRs apply solely to insignificant units, TCEQ should make those clarifications in the permit and permit record, as necessary, and evaluate whether the general monitoring conditions are sufficient to assure compliance for these insignificant units.

Therefore, TCEQ should include or identify the monitoring, recordkeeping, and reporting from the application forms for registered PBRs (in addition to the claimed but not registered PBRs).

With these changes and provided the PBR Supplemental Table is either included or sufficiently incorporated by reference into the title V permit, the title V permit should include identifiable monitoring, recordkeeping, and reporting necessary to assure compliance with the emission limits and standards in the PBRs.

**TCEQ Response to Claims C and D.1:**

The proposed permit (PP) and SOB are revised as follows:

1. Consistent with the permit by rule (PBR) related programmatic changes made to Title V permits, the applicant has submitted a “PBR Supplemental Table” (OP-PBRSUP) dated July 10, 2023 in the application for project 30965 to the permit application to list all PBRs applicable to the site, which include registered PBRs, claimed PBRs, and claimed PBRs for insignificant emission units. In addition, the PBR Supplemental table includes PBRs where applicability under 30 TAC Chapter 106 may be the only requirements applicable to an emission unit or an activity.
2. As shown in OP-PBRSUP Table, which is part of the permit record, the site lists registered PBRs in Table A, claimed but not registered PBRs in Table B, and PBRs for insignificant sources in Table C. Table D lists monitoring requirements of PBRs listed in Tables A and B.
3. Revised Special Term and Condition 30 in the proposed permit as follows: “Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule (including the terms, conditions, monitoring, recordkeeping, and reporting identified in registered PBR and permits by rule identified in the PBR Supplemental Tables dated July 10, 2023 in the application for project 30965), standard permits, flexible permits, special permits, permits for existing facilities including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under 30 TAC Chapter 116, Subchapter I, or special exemptions referenced in the New Source Review Authorization References attachment.”
4. New Source Review Authorization References by Emissions Unit table in the proposed permit (pages 1014-1059) has been updated to include the emission units listed in the OP-PBRSUP tables.
5. New Source Review Authorization table was updated to list NSR Permit Numbers 47256/PSDTX402M4/N258/GHGPSDTX116, effective 09/05/2023, revised NSR Permits 19599/PSDTX023 effective 08/24/2023, and NSR Permits 2231 and 22107, effective 02/11/2022.
6. Revised the SOB to include a reference to the PBR Supplemental Table and Special Term and Condition 30. In addition, the Insignificant Activity list in the SOB has been expanded to include a link to the de minimis source list and references to PBRs that are not listed on the OP REQ1.
7. As noted in OP-PBRSUP, Table C, the following PBRs apply only to insignificant units: 30 TAC §§ 106.244 and 106.316.
8. Following specific changes have been made to units authorized under a PBR (all of these changes are documented in OP-PBRSUP table)
* Removed PBR 106.261 from Unit ID T280-1045
* Added registration number 104884 for PBR 106.478 for Unit ID T280-106
* Added registration number 83759 for PBR 106.478 for Unit ID T280-270
* Added registration number 140391 for PBR 106.478 for Unit ID T280-33A
* Added registration number 151206 for PBR 106.261 for Unit IDs T280-531 and T280-535
* Added registration number 98820 for PBRs 106.261 and 106.478 for Unit ID TK-SM1001
* Removed Unit TNT185 from the permit as the unit is no longer in service
* Added registration number 156183 for PBRs 106.261 and 106.262 for Unit ID ARU-FUG1
* Added registration number 156208 for PBRs 106.261 and 106.262 for Unit ID ENVFC-FUG1
* Added registration number 164268 for PBRs 106.261 and 106.262 for Unit IDs TCH-6 and ALKY3-FUG1
* Added registration number 164572 for PBRs 106.261 and 106.262 for Unit IDs PS2-FUG; UU3-FUG1; ULC-FUG1; REF-FUG; REFDOCKFUG; SRU-FUG1; DDU-FUG1; CFHU-FUG1; RHU-FUG1
* Added registration number 164573 for PBR 106.261 for Unit ID ENVFC-FUG1
* Added registration number 164575 for PBR 106.261 for Unit IDs Alky2-FUG1 and ALKY3-FUG1
* Added registration number 164597 for PBRs 106.261 and 106.262 for Unit ID UU4-FG1
* Added registration number 164598 for PBR 106.261 for Unit IDs PS3A-FUG1 and PS3B-FUG1
* Added registration number 164599 for PBR 106.261 for Unit ID COKR-FUG1
* Added registration number 164600 for PBRs 106.261 and 106.262 for Unit ID AU2-FUG
* Added registration number 164601 for PBR 106.261 for Unit ID ARU-FUG1
* Added registration number 165267 for PBRs 106.261 and 106.478 for ARU-FUG1 and REF-FUG
* Removed Unit ID TK-F620 from the permit as it is no longer in service
* Removed Authorization SE 86 and Unit ID T280-536 from the permit as the unit is no longer in service
* Removed Authorization SE 107 and Unit ID DEGREASER08 from the permit as the unit is no longer in service
* Removed PBR 106.473 and Unit ID VEHGASTK from the permit. This was a temporary tank and is no longer on site. Unit ID VEH GAS TK remains in the permit.
* Removed T280-61 and T280-63 from the permit as these units are no longer in service.

#### Claim D: The Petitioners Claim that the Proposed Permit Fails to Assure Compliance with Emission Limits and Operating Requirements Established by Blanchard’s New Source Review Permits, Including Permits by Rule.

**Claim D.4: Monitoring of VOC Emissions from Flares**

**EPA Direction to TCEQ:** TCEQ must revise the title V permit to include the updated subpart CC refinery NESHAP standards applicable to Blanchard's flares, including the requirements in 40 C.F.R. § 63.670. TCEQ could accomplish this by specifying the applicable requirements in the Applicable Requirements Summary table. To the extent that these requirements will be used to demonstrate compliance with emission limits in Flexible Permit No. 47256/PSDTX402M4/N258/GHGPSDTX116, either that permit, or the title V permit, must indicate this connection.

**TCEQ Response to Claim D.4:**

NSR Permit No. 47256/PSDTX402M4/N258/GHGPSDTX116 was amended effective 09/05/2023 to resolve EPA’s concerns regarding Claim D.4 – Special **Condition 14 has been added with language which demonstrates applicability of 40 CFR 63, Subpart CC for flares.** Detailed, specific citations have been added in the Title V permit Applicable Requirements Summary table for all units subject to 40 CFR Part 63, Subpart CC (Proposed Permit at pages 124-888).

In addition, the proposed permit was revised to replace all remaining high-level requirements with specific requirements for all regulations for units in the applicable requirements summary (ARS) table.

#### Claim D.5: Monitoring of VOC Emissions from Tanks

**EPA Direction to TCEQ:** TCEQ must ensure that the title V permit includes monitoring, recordkeeping, and reporting sufficient to assure compliance with the prohibition on VOC emissions from the pressure tanks under Flexible Permit No. 47256/PSDTX402M4/N258/GHGPSDTX116. If part of this monitoring protocol is based on representations in a permit application, TCEQ must appropriately incorporate those into a permit document (either the underlying NSR permit or the title V permit) by specifying the version or date of the application and the specific location of the representations. TCEQ should also consider whether some form of monitoring or recordkeeping (e.g., of operating pressure) is necessary to ensure that the pressure tanks do not exceed the pressure values stated in the application representations. To the extent that some more direct indicator of venting could be monitored, this could be added to the permit in lieu of incorporating the pressure-related application representations. TCEQ could either make these revisions directly to Blanchard's title V permit, or it could add any necessary monitoring to Flexible Permit No. 47256/PSDTX402M4/N258/GHGPSDTX116 and then promptly revise the title V permit to incorporate the updated version of Flexible Permit No. 47256/PSDTX402M4/N258/GHGPSDTX116. In either case, the *title V permit* must ultimately contain the necessary monitoring in order to resolve the EPA's objection.

**TCEQ Response to Claim D.5:**

NSR Permit 47256/PSDTX402M4/N258/GHGPSDTX116 was amended effective 09/05/2023 to resolve EPA’s concerns regarding Claim D.5. Revised special condition (SC) 6 **requires continuous monitoring of the pressure of each pressure tank. In addition, SC 6 requires maintaining records for: tank identification number, maximum operating pressure of each pressure tank and the daily maximum pressure of each tank.**

#### Claim D.6: Monitoring of VOC from Material Transfer Operations

**EPA Direction to TCEQ:** TCEQ must ensure that the title V permit properly includes or incorporates by reference the approved testing protocol used to assure compliance with the 99.9 percent VOC collection efficiency requirement in Special Condition 8.B of Flexible Permit No. 47256/PSDTX402M4/N258/GHGPSDTX116. If TCEQ wishes to effectively incorporate this test protocol by reference, an enforceable permit document must identify the specific document where the test protocol can be found, consistent with EPA's longstanding guidance concerning IBR. *See, e.g., White Paper Number 2* at 36--41. TCEQ could either make these revisions directly to Blanchard's title V permit, or it could add any necessary monitoring to Flexible Permit No. 47256/PSDTX402M4/N258/GHGPSDTX116 and then promptly revise the title V permit to incorporate the updated version of that permit. In either case, the *title V permit* must ultimately contain or reference the necessary monitoring in order to resolve the EPA's objection.

**TCEQ Response to Claim 6:**

NSR Permit 47256/PSDTX402M4/N258/GHGPSDTX116 was amended effective 09/05/2023 to resolve EPA’s concerns regarding Claim D.6. **Special Condition 8.B(1) has been modified to include marine testing protocol dates and copies of the marine testing protocols** used to assure compliance with the 99.9 percent VOC collection efficiency**. A copy of the marine testing protocol is archived in TCEQ’s** [CFR Online](https://records.tceq.texas.gov/cs/idcplg?IdcService=TCEQ_SEARCH) **database with the NSR permit project number 332986 files for public access.** Please refer to WCC Content ID 5847946 pages 339-367 **for additional details of the testing protocol.**

**Claim D.7: Monitoring of Emission Limits for a Pipe Still Permit No. 19599/PSDTX023**

**EPA Direction to TCEQ:** TCEQ must ensure that the title V permit includes monitoring, recordkeeping, and reporting sufficient to assure compliance with the CO, NOx, PM10, and VOC emission limits for the pipe still and associated heaters and oil water separators authorized under Permit No. 19599/PSDTX023. If part of this monitoring protocol is based on other requirements to which Blanchard is subject (whether in EPA regulations, the Texas SIP, or a different permit issued by TCEQ), the title V permit must specifically identify these requirements as the means by which Blanchard will demonstrate compliance with the emission limits in Permit No.

19599/PSDTX023. If part of this monitoring protocol is based on representations in a permit application, TCEQ must appropriately incorporate those into a permit document by specifying the version or date of the application and the specific location of the representations. TCEQ could either make these revisions directly to Blanchard's title V permit, or it could add any necessary monitoring to Permit No. 19599/PSDTX023 and then promptly revise the title V permit to incorporate the updated version of that permit. In either case, the *title V permit* must ultimately contain the necessary monitoring in order to resolve the EPA's objection.

**TCEQ Response to Claim 7:**

As directed by EPA, FOP O1541, which incorporates SIP-approved NSR Permit Numbers 47256/PSDTX402M4/N258/GHGPSDTX116, effective 09/05/2023 and revised NSR Permits 19599/PSDTX023 effective 08/24/2023 by reference, includes monitoring, recordkeeping, and reporting sufficient to assure compliance with the CO, NOx, PM, and VOC emission limits for the pipe still and associated heaters and oil water separator units authorized under their respective NSR permits.

Specifically, NSR Permit 19599/PSDTX023 includes CO, NOx, PM, and VOC emissions related requirements for heater EPNs 51, 53 and 55 under special condition (SC) 19, SC 20 and SC 63. SC 19 states NOx requirements for EPN 53 and SC 63 requires the permit holder to install, calibrate, and maintain a CEMS to measure and record the in-stack concentrations of: NOx, CO and O2 for EPNs 51, 53 and 55. In addition, SC 63 also includes measurement of H2S in refinery fuel gas that is used as fuel. SC 20 lists the VOC and PM emissions related requirements for heater EPNs 51, 53 and 55.

NSR Permit 47256/PSDTX402M4/N258/GHGPSDTX116 includes CO, NOx, PM, and VOC emissions related requirements for heater EPNs 41, 42 and 43A under special condition (SC) 43 and SC 75. Although SC 43 does not list EPNs 41, 42 and 43A, the special condition applies to all heaters with max firing rate of 100 MMBtu or greater which apply to these EPNs listed in the MAERT for NSR Permit 47256/PSDTX402M4/N258/GHGPSDTX116. SC 75 lists the VOC and PM emissions related requirements for heater EPNs 41, 42 and 43A.

NSR Permit 19599/PSDTX023 authorizes Pipe still unit separator EPNs 46, 47, and 56. Specifically, SC 50, 53 and 54 state the monitoring and recordkeeping requirements of the carbon absorption system (CAS) that controls VOC emissions from wastewater facilities. EPN 46, 47, and 56 oil water separators utilize work practice standards to ensure compliance with VOC limits. Also, SC 50, 51, 53, and 54 specify the carbon canister sampling methods, frequency, and recordkeeping to ensure the VOC emission limit is not exceeded. The oil water separator emissions are controlled by dual carbon adsorption beds. The monitoring they perform meets requirements under 40 CFR 60.695(a)(3)(ii). NSR Permit 19599/PSDTX023, SC 54 specifies the monitoring device used to measure the VOCs. In addition, VOC separator units PS3B-SEP1, PS3B-SEP2, and PS3A-OWS are listed in the Proposed Permit (see pages 55, 56, 58, 59, 387, 428, and 429) that have applicable monitoring, reporting and recordkeeping requirements under 30 TAC Chapter 115, Water Separation and under 40 CFR Part 61, Subpart FF regulations.

As stated above, FOP O1541 which incorporates SIP-approved NSR Permit Numbers 47256/PSDTX402M4/N258/GHGPSDTX116, effective 09/05/2023 and revised NSR Permits 19599/PSDTX023 effective 08/24/2023 by reference, includes a revised major NSR summary table (see Proposed Permit pages 1093 through 1137) that is updated to document the NSR permit amendments.