



Title V Updates

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Presentation Outline

- **General Operating Permits**
- PBR Supplemental Table
- Decision Support System Updates
- Conclusion



GOPs 511, 512, 513, and 514

- GOP 511: Brazoria, Chambers, Collin, Dallas, Denton, El Paso, Ellis, Fort Bend, Galveston, Hardin, Harris, Jefferson, Johnson, Kaufman, Liberty, Montgomery, Orange, Parker, Rockwall, Tarrant, Waller and Wise Counties
- GOP 512: Gregg, Nueces, Victoria Counties
- GOP 513: Aransas, Bexar, Calhoun, Matagorda, San Patricio, and Travis Counties
- GOP 514: Counties other than those above





Renewal of Oil and Gas GOPs

- Renewal issued October 15, 2020
- Must submit new ATO if any emission units, applicability determinations, or the basis for the applicability determinations are affected by the revisions in the renewed GOPs
- New ATO is not required if revisions do not affect the site





40 CFR Part 60 (NSPS) Updates

- Subparts 0000 and 0000a
 - Added index numbers and requirements for storage vessels, gas sweetening units, fugitive emissions, and well affected facilities
- Subpart IIII (compression engines)
 - Added index numbers for non-emergency engines that fire diesel fuel
- Minor updates to other subparts





40 CFR Part 63 (MACT) Updates

- Subpart DDDDD
 - Boilers and Process heaters located at major sources of HAPs
 - Boilers remain on existing tables
 - Process heaters have been moved to new tables (new index numbers)
- Minor updates to other subparts





30 TAC Updates

- Chapter 115, Subchapter E: Surface Coating
 - Division 2 was added to GOPs 511 and 512
 - Division 5 was added to GOP 511
- Minor Updates:
 - Chapter 115, general and transfer of VOCs
 - Chapter 117, control of NOx





Revision to Oil and Gas GOPs

- Revision scheduled for publication November 13, 2020
- 30-day public comment period ending December 13, 2020
- Revision to be issued March 1, 2021
- Revisions include:
 - Correction of citation errors to MACT HH, MACT ZZZZ, NSPS Kb, and NSPS OOOO
 - Incorporation of NSPS OOOOa amendment





GOPs 517 and 518

- **GOP 517: Municipal Solid Waste Landfills**
 - Revised and renewed effective February 24, 2020
 - Submittal date (passed) May 24, 2020
- **GOP 518: Air Curtain Incinerator**
 - In the process of being revised and renewed
 - Anticipated renewal date no later than December 2021





GOP Questions?

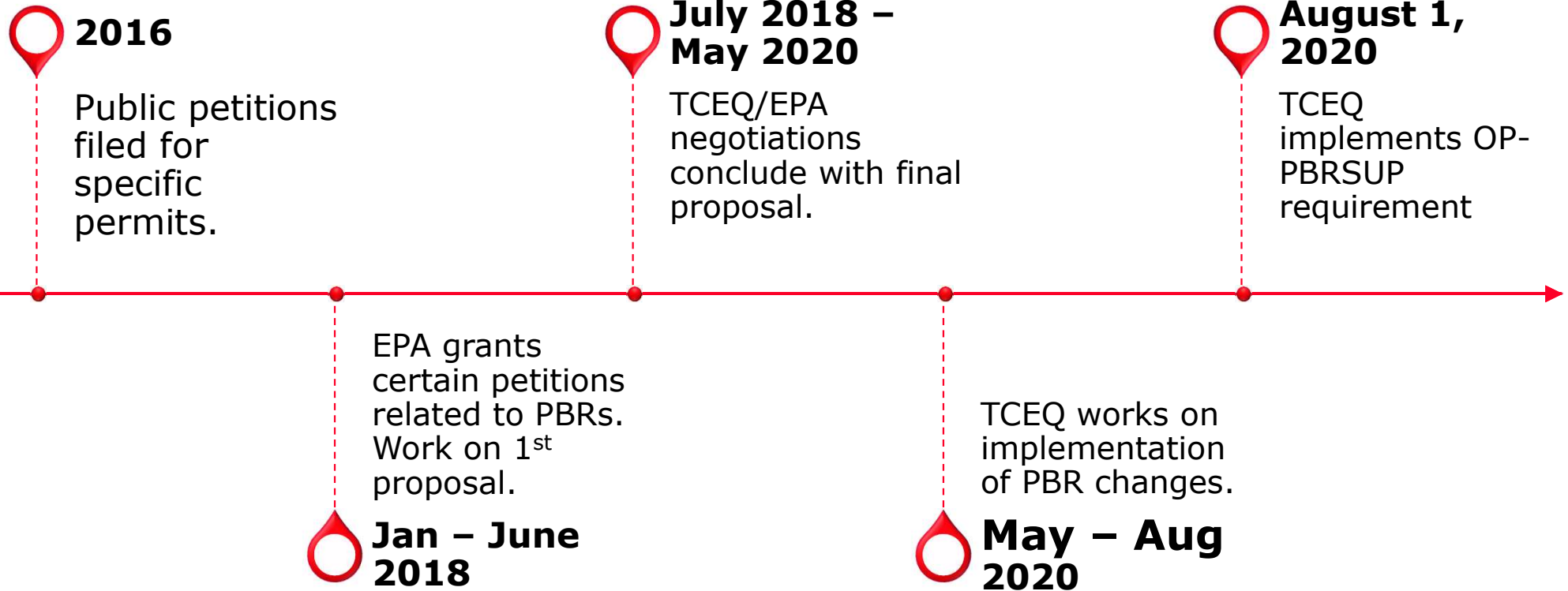


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TCEQ PBR Timeline





Preconstruction Authorizations

- OP-SUM and OP-SUMR instruction updates:
 - All 30 TAC Chapter 116 or 30 TAC Chapter 106 preconstruction authorizations, including PBR registration numbers, must be listed. Separate multiple PBR registrations by commas.
 - All units authorized by PBRs must also be added to OP-PBRSUP
- OP-REQ1 instructions:
 - Section XII includes a list of specific PBRs that must be listed if authorizing a unit at the site.



OP-PBRSUP (PBR Supplemental Table)

- Required for submittals beginning August 1, 2020
 - Postmarked on or after August 1, 2020 OP-PBRSUP required
- Required project types
 - Initial
 - Renewal
 - Significant revision with renewal > 2 years away
- Required forms
 - OP-SUM/OP-SUMR
 - OP-PBRSUP



OP-PBRSUP (PBR Supplemental Table)

- Table A: Registered Permits by Rule for the Application Area
- Table B: Claimed (not registered) Permits by Rule for the Application Area
- Table C: Claimed (not registered) Permits by Rule for Insignificant Sources for the Application Area
- Table D: Monitoring Requirements for claimed (not registered) PBRs in the Application Area



Updated STC in FOP

- 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 permits by rule identified in the PBR Supplemental Tables in the application), standard permits...



NSR Authorization References

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other than Permits By Rule, PSD Permits, or NA Permits) for the Application Area

Authorization No.: 999888

Issuance Date: 10/23/2020

Permits By Rule (30 TAC Chapter 106) for the Application Area

Number: 106.359

Version No./Date: 09/10/2013



Unit-Specific PBR Representation

Unit / Group / Process ID No.	Emission Unit Name/Description	New Source Review Authorization
BOIL-1	Boiler House 1	106.183/09/04/2000
T-100	VOC Tank	106.359/09/10/2013 [123456, 345678]



PBR Representation in Statement of Basis

- The application, or a previously submitted application, contains a PBR Supplemental Table. This table provides supplemental information for all PBR authorizations at the site or application area, including PBRs that are not listed on the OP-REQ1 form. PBRs that are not listed on the OP-REQ1 form authorize emission units that the TCEQ has determined are insignificant sources of emissions (IEUs). PBRs are enforceable through permit condition number {permit specific STC ##}.



FAQs for OP-PBRSUP

- What is insignificant?
- If a claimed PBR does not have monitoring nor recordkeeping, is anything required for Table D?
- Can we “roll in” the required PBRs into the FOP?
- What is the Unit ID for a claimed PBR on Table B?



What is Insignificant?

- What qualifies a source to be insignificant?
- Every source authorized by a PBR that is currently not listed on the OP-REQ1 instructions PBR list, (section XII) is insignificant. For example:
 - 106.102: Comfort heating
 - 106.122: Bench-scale laboratory equipment
 - 106.242: Food preparation
 - 106.244: Ovens, Barbeque Pits, Cookers





Claimed, but no Recordkeeping?

- When a claimed PBR has no recordkeeping or monitoring requirements, what is required in Table D?
- PBRs listed on the OP-REQ1 are not “insignificant” and monitoring must be provided for these sources or activities.
 - Must satisfy the periodic monitoring requirements of 30 TAC Chapter 122;
 - May consist of recordkeeping; and
 - Demonstrate compliance with emissions limits or work practice standards and meet the general conditions of 106.4.



Roll-In PBRs via OP-PBRSUP?

- We want to roll in the required PBRs in the FOP via the OP-PBRSUP form. Can we do that?
- Submittal of the OP-PBRSUP form does not roll PBRs into the operating permit. The OP-PBRSUP tables will remain in the application. PBRs will be included in the operating permit via the OP-REQ1, OP-SUM and OP-SUMR.



What is the unit ID on Table B?

- Are unique identifiers or unit IDs required for all activities listed in Table B of OP-PBRSUP?
- Yes. If a PBR is claimed on Table B, and there is no identifier, then an identifier will need to be created. This may be unit or operation specific. These IDs should be consistent with other unit IDs or IDs used in an emissions inventory (for example).



OP-PBRSUP Questions?



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Decision Support System (DSS)

- Provides a method for determining and codifying requirements for units and processes in a Title V air permit
 - Incorporates detailed analysis of rule text
 - Uses rule-specific flowcharts
 - Is used in conjunction with unit attribute forms



DSS Regulation Updates

- 40 CFR Part 60 Rules and Regulations
 - NSPS GGGa: equipment leaks
 - NSPS Da/Dc: steam generating unit
 - NSPS Ja: petroleum refineries
- 40 CFR Part 63 Rules and Regulations
 - MACT CC: refineries
- Texas Administrative Code Title 30
 - Chapter 115 Loading and Unloading



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Summary

- General Operating Permits
 - GOPs 511, 512, 513, 514, and 517 have been revised and renewed. New ATO is not required if revisions do not affect the site.
 - GOP 518 renewal is in progress.
- PBR Supplemental Table
 - Required for initial, renewal, and significant revision applications
- DSS Updates
 - NSPS, MACT, and TAC rules to address previously high-level permit requirements



Questions?



Follow-Up Question #1

- The OP-PBRSUP form indicates that for registered PBRs, if there are no monitoring requirements in the application, then you are required to update the representation prior to operating and public notice. For facilities that have hundreds of PBRs, are they required to be updated, as well?
 - Yes.



Follow-Up Question #2

- An attendee submitted a GOP Renewal Application (October 2020). Do you have to resubmit the PBR form or any updated forms since submitting in October 2020?
 - General operating permit (GOP) applications for initial and renewal projects, are required to include the new Permits by Rule Supplemental Table ([Form OP-PBRSUP](#)) for applications submitted after August 1, 2020. If it was not included with your application, it will need to be submitted before issuance. If the form was submitted, you do not need to resubmit unless there have been changes that need to be incorporated.



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