



Texas Commission on Environmental Quality

Form OP-UA12 - Instructions Fugitive Emission Unit Attributes

General:

This form is used to provide a description and data pertaining to all fugitive emission units with potentially applicable requirements associated with a particular regulated entity 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 a fugitive emission unit, 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 that rule represented on the table, then the applicant does not have to complete the remainder of the table(s) that correspond 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:

- Table 1a - 1j:** Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart KKK: Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants
- Table 2a - 2j:** Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter D: Fugitive Emission Control in Petroleum Refining, Natural Gas/Gasoline Processing, and Petrochemical Processes in Ozone Nonattainment Areas
- Table 3a - 3j:** Title 40 Code of Federal Regulations Part 61 (40 CFR Part 61)
Subpart V: National Emission Standard for Equipment Leaks (Fugitive Emission Sources)
- Table 4a - 4k:** Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart VV: Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry
- Table 5a - 5h:** Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart DDD: Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry
- Table 6:** Title 40 Code of Federal Regulations Part 61 (40 CFR Part 61)
Subpart J: National Emission Standard for Equipment Leaks (Fugitive Emission Sources) of Benzene
- Table 7a - 7f:** Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter D: Fugitive Emission Control in Petroleum Refineries in Gregg, Nueces, and Victoria Counties
- Tables 8a - 8k:** Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart GGG: Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries
- Tables 9a - 9g:** Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart H: National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks
- Table 10:** Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart I: National Emission Standards for Organic Hazardous Air Pollutants for Certain Processes Subject to the Negotiated Regulation for Equipment Leaks
- Tables 11a - 11c:** Title 40 Code of Federal Regulations Part 61 (40 CFR Part 61)
Subpart F: National Emission Standard for Vinyl Chloride

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| Tables 12a - 12f: | Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63) Subpart CC: National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries |
| Tables 13a - 13m: | 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 |
| Tables 14a - 14m: | Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63) Subpart U: National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins |
| Table 15a - 15m: | Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63) Subpart JJJ: National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins |
| Tables 16a - 16c: | Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115) Subchapter H: Fugitive Emissions (HRVOC) |

The application area name from Form OP-1 entitled, "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), and the date of the revision submittal.

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 a regulation for a unit.

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 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 Numbers 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 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 Web site at www.tceq.state.tx.us/permitting/central_registry/index.html.

Specific:

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| Tables 9a: | Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63) Subpart H: National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks |
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Complete only for sources subject to a 40 CFR Part 63 subpart which references 40 CFR Part 63, Subpart H.

UNIT ID NO.: Enter the identification number (ID No.) for the fugitive unit (maximum 10 characters) as listed on Form OP-SUM (Individual Unit Summary).

SOP 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]). For additional information relating to SOP Index Numbers, please go to the TCEQ Web site at http://www.tceq.state.tx.us/assets/public/permitting/air/Guidance/Title_V/additional_fop_guidance.pdf.

Note to SOP Applicants: Some fugitive units may have all equipment identified in 40 CFR Part 63, Subpart H. Applicants may choose to identify the SOP index number as "63H-ALL" in lieu of the corresponding unit attribute information. Use of this index number will imply that all requirements, other than closed vent system and control device requirements, in the regulation apply to the fugitive unit. If closed vent systems and control devices are also used to comply, this information, with identification numbers, must be submitted on the appropriate table of the form. Fugitive units containing surge control vessels not routed to a process or not complying with the requirements of 40 CFR § 63.119(b) or (c) must indicate closed vent system and control device requirements. Please note that this index number cannot be used if an alternative has been approved.

EQUIPMENT TYPE: Enter "YES" if the fugitive unit contains equipment listed in 40 CFR § 63.160(a) which is operated in organic hazardous air pollutant service. Otherwise, enter "NO."

▼ Continue Only If "Equipment Type" is "YES."

NON-RESEARCH AND DEVELOPMENT/BATCH PROCESSES: Enter "YES" if the fugitive unit contains processes other than research and development facilities and bench-scale batch processes. Otherwise, enter "NO."

▼ Continue Only if "Non-Research and Development/Batch Processes" is "YES."

VACUUM SERVICE: Enter "YES" if all of the equipment in the fugitive unit is in vacuum service. Otherwise, enter "NO."

▼ Continue Only if "Vacuum Service" is "NO."

LESS THAN 300 OPERATING HOURS: Enter "YES" if the fugitive unit contains any equipment in organic hazardous air pollutant (HAP) service that is intended to operate less than 300 hours per calendar year. Otherwise, enter "NO."

★ Complete "Heavy Liquid Service" Only If "Less Than 300 Operating Hours" is "YES."

HEAVY LIQUID SERVICE: Enter "YES" if any of the equipment in organic HAP service that is intended to operate less than 300 hours per calendar year is in heavy liquid service. Otherwise, enter "NO."

AMEL: Enter "YES" if the fugitive unit is complying with an alternative means of emission limitation (AMEL). Otherwise, enter "NO."

★ Go to Table 9c if "Alternative Means of Emission Limitation" is "NO."

Tables 9b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart H: National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks

UNIT ID NO.: Enter the identification number (ID No.) for the fugitive unit (maximum 10 characters) as listed on Form OP-SUM (Individual Unit Summary).

SOP 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

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This form for use by facilities subject to air quality permit requirements and may be revised periodically. (APDG 5075 v10)

the fugitive unit, enter "NO" in the table column. Indicate only those components which are subject to 40 CFR Part 63, Subpart H. This information will ensure that only the appropriate requirements for each fugitive process are reflected in the permit. The following table lists the component types.

| TITLE 40 CFR PART 63, SUBPART H FUGITIVE UNIT COMPONENT TYPES | |
|--|---|
| Component Type | Type of Service or Control Device |
| Pumps | Light Liquid Service (<i>Table 9c</i>) |
| | Heavy Liquid Service (<i>Table 9c</i>) |
| Compressors | Any (<i>Table 9c</i>) |
| Pressure Relief Devices | Gas/Vapor Service (<i>Table 9c</i>) |
| | Liquid Service (<i>Table 9c</i>) |
| | Heavy Liquid Service (<i>Table 9c</i>) |
| Sampling Connection Systems | Any (<i>Table 9c</i>) |
| | Heavy Liquid Service (<i>Table 9c</i>) |
| Open-ended Valves or Lines | Any (<i>Table 9d</i>) |
| | Heavy Liquid Service (<i>Table 9d</i>) |
| Valves | Gas/Vapor or Light Liquid Service (<i>Table 9d</i>) |
| | Heavy Liquid Service (<i>Table 9d</i>) |
| Connectors | Gas/Vapor or Light Liquid Service (<i>Table 9d</i>) |
| | Heavy Liquid Service (<i>Table 9d</i>) |
| Agitators | Gas/Vapor or Light Liquid Service (<i>Table 9e</i>) |
| | Heavy Liquid Service (<i>Table 9e</i>) |
| Instrumentation Systems | Any (<i>Table 9e</i>) |
| | Heavy Liquid Service (<i>Table 9e</i>) |
| Surge Control Vessels or Bottom Receivers | Any (<i>Table 9e</i>) |
| | Heavy Liquid Service (<i>Table 9e</i>) |
| Closed Vent Systems | Any (<i>Table 9f</i>) |
| | Recovery or Recapture Devices (<i>Table 9f</i>) |
| | Enclosed Combustion Devices (<i>Table 9f</i>) |
| | Flares (<i>Table 9f</i>) |

★ **Complete the Following Items Only Where Appropriate.**

QUALITY IMPROVEMENT PROGRAM: Some fugitive unit components have the option to comply with a quality improvement program (QIP) (this applies to only those fugitive unit components with the "QIP" column). Enter "YES" in the table column if any of those particular fugitive unit components are complying with the requirements in 40 CFR § 63.175 or 40 CFR § 63.176, as appropriate. Otherwise, enter "NO."

CONTROL DEVICE ID NO.: If applicable, enter the identification number (ID No.) for the control device to which emissions are routed (maximum 10 characters). This number should be consistent with the control device identification number on Form OP-SUM (Individual Unit Summary). Use multiple lines if more than one control device is used. If there is no control device, then leave this column blank.

Tables 9g: **Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)**
Subpart H: National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks

UNIT ID NO.: Enter the identification number (ID No.) for the fugitive unit (maximum 10 characters) as listed on Form OP-SUM (Individual Unit Summary).

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This form for use by facilities subject to air quality permit requirements and may be revised periodically. (APDG 5075 v10)

SOP 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]). For additional information relating to SOP Index Numbers, please go to the TCEQ Web site at http://www.tceq.state.tx.us/assets/public/permitting/air/Guidance/Title_V/additional_fop_guidance.pdf.

BY-PASS LINES: Enter “YES” if the fugitive unit contains any closed-vent systems containing by-pass lines that could divert a vent stream away from the control device and to the atmosphere. Otherwise, enter “NO.”

UNSAFE TO INSPECT: Enter “YES” if the fugitive unit contains any closed-vent system with parts designated as unsafe to inspect. Otherwise, enter “NO.”

DIFFICULT TO INSPECT: Enter “YES” if the fugitive unit contains any closed-vent system with parts designated as difficult to inspect. Otherwise, enter “NO.”

EMPLOYEE NUMBER: Enter “YES” if the corporation employs fewer than 100 persons, including employees providing professional and technical contract services. Otherwise, enter “NO.”

TITLE 40 CFR PART 63, SUBPART H FUGITIVE UNIT DESCRIPTION: Provide a brief description (maximum 250 characters) of the area containing the fugitive equipment or the grouping of equipment. If the “Title 40 CFR Part 63, Subpart H Fugitive Unit Description” is the same as the “Title 30 TAC Chapter 115 Fugitive Unit Description,” enter “SAME” in this space. Example descriptions include: “transfer and loading fugitives,” “storage area fugitives,” “manufacturing fugitives,” “pipeline fugitives,” etc. Use multiple lines, if necessary.



Fugitive Emission Unit Attributes
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Table 9a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart H: National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks

| | | |
|-------------------|--------------------|--------------------------------|
| Date: | Permit No.: | Regulated Entity No.: |
| Area Name: | | Customer Reference No.: |

| Unit ID No. | SOP Index No. | Equipment Type | Non Research and Development/Batch Processes | Vacuum Service | Less Than 300 Operating Hours | Heavy Liquid Service | AMEL |
|-------------|---------------|----------------|--|----------------|-------------------------------|----------------------|------|
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Fugitive Emission Unit Attributes



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Table 9d: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart H: National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks

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|-------------------|--------------------|--------------------------------|
| Date: | Permit No.: | Regulated Entity No.: |
| Area Name: | | Customer Reference No.: |

| Unit ID No. | SOP Index No. | Title 40 CFR Part 63, Subpart H Fugitive Unit Components | | | | | | |
|-------------|---------------|--|----------------------|-----------------------------------|----------------------|-----|-----------------------------------|----------------------|
| | | Open-Ended Valves or Lines | | Valves | | | Connectors | |
| | | Any | Heavy Liquid Service | Gas/Vapor or Light Liquid Service | Heavy Liquid Service | QIP | Gas/Vapor or Light Liquid Service | Heavy Liquid Service |
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Table 9g: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart H: National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks

| | | |
|-------------------|--------------------|--------------------------------|
| Date: | Permit No.: | Regulated Entity No.: |
| Area Name: | | Customer Reference No.: |

| Unit ID No. | SOP Index No. | Bypass Lines | Unsafe To Inspect | Difficult To Inspect | Employee Number | Title 40 CFR Part 63, Subpart H Fugitive Unit Description |
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