



## 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:

<b>Table 1a - 1j:</b>	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
<b>Table 2a - 2j:</b>	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
<b>Table 3a - 3j:</b>	Title 40 Code of Federal Regulations Part 61 (40 CFR Part 61) Subpart V: National Emission Standard for Equipment Leaks (Fugitive Emission Sources)
<b>Table 4a - 4k:</b>	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
<b>Table 5a - 5h:</b>	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
<b>Table 6:</b>	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
<b>Table 7a - 7f:</b>	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
<b>Tables 8a - 8k:</b>	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
<b>Tables 9a - 9g:</b>	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
<b>Table 10:</b>	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
<b>Tables 11a - 11c:</b>	Title 40 Code of Federal Regulations Part 61 (40 CFR Part 61) Subpart F: National Emission Standard for Vinyl Chloride
<b>Tables 12a - 12f:</b>	Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63) Subpart CC: National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries

<b>Tables 13a - 13m:</b>	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
<b>Tables 14a - 14m:</b>	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
<b>Table 15a - 15m:</b>	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
<b>Tables 16a - 16c:</b>	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](http://www.tceq.state.tx.us/permitting/central_registry/index.html).

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**Specific:**

<b>Tables 1a - 1j:</b>	<b>Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)</b> <b>Subpart KKK: Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants</b>
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*Complete Table 1 only for facilities located at an onshore natural gas processing plant as defined in 40 CFR § 60.631.*

*Note:* For more information regarding the definition of “onshore,” refer to the TCEQ Rule Interpretation #60LLL.02 regarding the conditions under which gas sweetening units located in marshes or bays are considered to be part of the territorial seas for purposes of determining applicability of 40 CFR Part 60, Subpart LLL.

Complete Table 3 for sources subject to 40 CFR Part 61, Subpart V. Do not complete Table 1.

**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/GOP INDEX NO.:** Site operating permit (SOP) applicants should indicate the SOP index number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). General operating permit (GOP) applicants should indicate the appropriate GOP index number in this column from the applicable GOP table (SSS-FF-XXX). Applicants should complete all applicable GOP attributes information before determining the GOP index number. 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](http://www.tceq.state.tx.us/assets/public/permitting/air/Guidance/Title_V/additional_fop_guidance.pdf).

*Note:* This GOP index number is entered only for affected facilities/fugitive units that commenced construction, reconstruction, or modification on or before January 20, 1984 (“Construction Date” designation of “84-”). The GOP index numbers for affected facilities/fugitive units that commenced construction, reconstruction, or modification after January 20, 1984 (“Construction Date” designation of “84+”) will be represented on Table 1a through 1i. The GOP applicants filling out Tables 1a through 1i will leave this column (“GOP Index No.”) blank.

*Note to SOP Applicants:* Some fugitive units may have all equipment identified in 40 CFR Part 60, Subpart KKK. Applicants may choose to identify the SOP index number as “60KKK-ALL” in lieu of the corresponding unit attributes 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. Please note that this index number cannot be used if an alternative has been approved or for GOP applications.

**FACILITY TYPE:** Select one of the following codes for the type of facility. Enter the code on the form.

<u>Code</u>	<u>Description</u>
GROUP	The group of all equipment within a process unit at an onshore natural gas processing plant
OTHER	The facility is not an affected facility as defined in 40 CFR § 60.630(a)(2) or (a)(3)

▼ Continue only if “Facility Type” is “GROUP.”

**CONSTRUCTION/MODIFICATION DATE:** Select one of the following codes that describe the date of commencement of the most recent construction, reconstruction, or modification. Enter the code on the form.

<u>Code</u>	<u>Description</u>
84-	On or before January 20, 1984
84+	After January 20, 1984

▼ Continue Only if “Construction/Modification Date” Is “84+”.

**FACILITY COVERED BY 40 CFR PART 60, SUBPARTS VV OR GGG:** Enter “YES” if the facility is already covered by 40 CFR Part 60, Subparts VV or GGG. Otherwise, enter “NO.”

▼ Continue only if “Facility Covered by 40 CFR Part 60, Subparts VV or GGG” is “NO.”

**TITLE 40 CFR PART 60, SUBPART KKK FUGITIVE UNIT COMPONENTS:** The columns on Tables 1a through 1i correspond to the types of fugitive unit components addressed in 40 CFR Part 60, Subpart KKK. Next to each unit identification number, enter “YES” in a column if the described component(s) are included in the facility/fugitive unit. If no such components are present in the affected fugitive unit, enter “NO” in the column. Indicate components subject to 40 CFR Part 60, Subpart KKK only.

This information will ensure that only the appropriate requirements for each fugitive unit are reflected in the permit. The following table lists the component types.

TITLE 40 CFR PART 60, SUBPART KKK FUGITIVE UNIT COMPONENT TYPES		
Component Type	Type of Service or Control Device	GOP Index Number
Compressors	Any (Not Reciprocating in Wet Gas Service) ( <i>Table 1a</i> )	511-10-007
	Reciprocating in Wet Gas Service ( <i>Table 1a</i> )	511-10-006
Any Component	Vacuum Service ( <i>Table 1b</i> )	511-10-002
	Non-VOC or Non-wet Gas Service ( <i>Table 1b</i> )	511-10-003
Pumps	Light Liquid Service ( <i>Table 1b</i> )	511-10-004
	Heavy Liquid Service ( <i>Table 1c</i> )	511-10-005
Pressure Relief Devices	Gas/Vapor Service ( <i>Table 1c</i> )	511-10-008
	Light Liquid Service ( <i>Table 1d</i> )	511-10-009
	Heavy Liquid Service ( <i>Table 1d</i> )	511-10-009
Open-ended Valves or Lines	Any ( <i>Table 1e</i> )	511-10-011
Flanges and Other Connectors	Any ( <i>Table 1e</i> )	511-10-014
Valves	Gas/Vapor Service ( <i>Table 1f</i> )	511-10-012
	Light Liquid Service ( <i>Table 1f</i> )	511-10-012
	Heavy Liquid Service ( <i>Table 1g</i> )	511-10-013
Control Devices and Closed-vent Systems	Flare ( <i>Table 1g</i> )	511-10-015
	Vapor Recovery System ( <i>Table 1h</i> )	511-10-016
	Enclosed Combustion Device ( <i>Table 1h</i> )	511-10-016
	Other Control Device ( <i>Table 1i</i> )	511-10-016

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

**AMEL:** An alternate method of emission limitation (AMEL), approved by the EPA Administrator under 40 CFR § 60.634, may be used for certain fugitive unit components to achieve a reduction in VOC emissions at least equivalent to the reduction in VOC emissions achieved under any design, equipment, work practice, or operational standard.

If any of the types of fugitive unit components indicated in the preceding columns are complying with an AMEL, enter “YES.” Otherwise, enter “NO.” The GOP applicants must leave this column blank.

**AMEL ID NO.:** If an AMEL has been approved, enter the corresponding AMEL unique identifier (maximum 10 characters) for each fugitive unit. If the unique identifier is unavailable, then enter the date of the AMEL approval letter in the table column. The unique identifier and/or the date of the approval letter are contained in the Compliance File under the appropriate account number. Otherwise, leave this column blank.

**COMPLYING WITH 40 CFR § 60.482:** Some fugitive unit components have the option to comply with 40 CFR § 60.482 (This applies only to those fugitive unit components with the “Complying with 40 CFR § 60.482” column preceding it). Enter “YES” if any of those particular fugitive unit components are complying with the requirements in 40 CFR §§ 60.482-2 - 4, 40 CFR §§ 60.482-6 - 8, and 40 CFR § 60.482-10. Otherwise, enter “NO.” The GOP applicants must leave this column blank.

*Note:* Enter “YES” for “Complying with 40 CFR § 60.482” unless all of those specified fugitive unit components are operating under an AMEL.

**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.

**TITLE 40 CFR PART 60, SUBPART KKK FUGITIVE UNIT DESCRIPTION:** Provide a brief description of the area containing the affected fugitive equipment or the grouping of equipment (maximum 250 characters). Example descriptions include: “transfer and loading fugitives,” “storage area fugitives,” “manufacturing fugitives,” “pipeline fugitives,” etc. Use multiple lines, if necessary.



**Fugitive Emission Unit Attributes  
Form OP-UA12 (Page 1)  
Federal Operating Permit Program**

**Table 1a: 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**

<b>Date:</b>	<b>Permit No.:</b>	<b>Regulated Entity No.:</b>
<b>Area Name:</b>		<b>Customer Reference No.:</b>

Unit ID No.	SOP/GOP Index No.	Facility Type	Construction/Modification Date	Facility Covered by 40 CFR Part 60, Subparts VV or GGG	Title 40 CFR Part 60, Subpart KKK Fugitive Unit Components				
					Compressors	Reciprocating Compressor in Wet Gas Service	AMEL	AMEL ID No.	Complying With § 60.482-3
					511-10-007	511-10-006			





**Fugitive Emission Unit Attributes  
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Federal Operating Permit Program**

**Table 1c: 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**

<b>Date:</b>	<b>Permit No.:</b>	<b>Regulated Entity No.:</b>
<b>Area Name:</b>		<b>Customer Reference No.:</b>

Unit ID No.	SOP Index No.	Title 40 CFR Part 60, Subpart KKK Fugitive Unit Components <i>(continued)</i>							
		Pumps <i>(continued)</i>				Pressure Relief Devices			
		Heavy Liquid Service	AMEL	AMEL ID No.	Complying With § 60.482-8	Gas/Vapor Service	AMEL	AMEL ID No.	Complying With § 60.482-4
		511-10-005				511-10-008			







**Fugitive Emission Unit Attributes  
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Federal Operating Permit Program**

**Table 1f: 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**

<b>Date:</b>	<b>Permit No.:</b>	<b>Regulated Entity No.:</b>
<b>Area Name:</b>		<b>Customer Reference No.:</b>

Unit ID No.	SOP Index No.	Title 40 CFR Part 60, Subpart KKK Fugitive Unit Components <i>(continued)</i>							
		Valves							
		Gas/Vapor Service	AMEL	AMEL ID No.	Complying With § 60.482-7	Light Liquid Service	AMEL	AMEL ID No.	Complying With § 60.482-7
		511-10-012				511-10-012			







**Fugitive Emission Unit Attributes  
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Federal Operating Permit Program**

**Table 1i: 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**

<b>Date:</b>	<b>Permit No.:</b>	<b>Regulated Entity No.:</b>
<b>Area Name:</b>		<b>Customer Reference No.:</b>

Unit ID No.	SOP Index No.	Title 40 CFR Part 60, Subpart KKK Fugitive Unit Components <i>(continued)</i>				
		Control Device(s) and Closed-Vent Systems <i>(continued)</i>				
		Closed-Vent Systems	Complying With § 60.482-10	Control Device ID No.	Other Control Device	Control Device ID No.
511-10-016						

