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By Linell Carter at 4:25 pm, May 29, 2009



Department of Energy  
National Nuclear Security Administration  
Pantex Site Office  
P. O. Box 30030  
Amarillo, TX 79120



MAY 29 2009

**MEMORANDUM FOR:** W. R. Mairson, Environment, Safety, & Health, B&W Pantex

**FROM:** *Craig A. Snider for*  
Johnnie F. Guelker, Assistant Manager for Environmental  
& Site Engineering Programs

**SUBJECT:** Permit Application Flexible Permit Number: 84802

Please reference the attached Texas Commission on Environmental Quality Flexible Air Quality Permit dated May 5, 2009.

Referenced flexible air quality permit is in response to the general application for air preconstruction permits and amendments found to have been technically complete March 19, 2009. The attached permit contains general and special conditions and a table of maximum allowable emission caps/rates that define the level of operation and allowable emissions. In addition, operation of the facilities must be as represented in the application. This permit is in effect as of May 5, 2009, and will remain in effect for ten years from the date of approval.

The Pantex Site Office would like to thank you and your staff for the effort in completing and securing the Pantex Flexible Air Quality Permit. If you have any questions, please contact Jack Zanger at extension 3638.

Attachment

cc w/attachment (via email):  
D. Riekenberg, SC, PXSO  
C. Snider, EC, PXSO  
J. Zanger, EC, PXSO  
J. Flowers, RCD, B&W  
R. Roulston, RCD, B&W  
RCD Records, B&W

EC:FY09:172;10313

Buddy Garcia, *Chairman*  
Larry R. Soward, *Commissioner*  
Bryan W. Shaw, Ph.D., *Commissioner*  
Mark R. Vickery, P.G., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY  
*Protecting Texas by Reducing and Preventing Pollution*

May 5, 2009

MR J F GUELKER  
ASSISTANT MANAGER  
US DEPARTMENT OF ENERGY  
PO BOX 30030  
AMARILLO TX 79120-0030

Re: Permit Application  
Flexible Permit Number: 84802  
Pantex Plant  
Panhandle, Carson County  
Regulated Entity Number: RN100210756  
Customer Reference Number: CN600125009  
Account Number: CF-0019-W

Dear Mr. Guelker:

This is in response to your Form PI-1 (General Application for Air Preconstruction Permits and Amendments) concerning the above-referenced facility. This will acknowledge that your application for the above-referenced permit is technically complete as of March 19, 2009. We appreciate your cooperation in sending us the information necessary to evaluate your proposal.

As indicated in Title 30 Texas Administrative Code § 116.710 (30 TAC § 116.710), and based on our review, a flexible permit for your new facility is enclosed. The permit contains general and special conditions and a table of maximum allowable emission caps/rates that define the level of operation and allowable emissions. In addition, construction (where applicable) and operation of the facilities must be as represented in the application.

Planned maintenance, start-up, and shutdown for the sources identified on the maximum allowable emission rate table (MAERT) have been reviewed and included in the MAERT and specific maintenance activities are identified in the permit special conditions. Any other maintenance activities are not authorized by this permit and will need to obtain separate authorization.

This permit will be automatically void upon the occurrence of any of the following, per 30 TAC § 116.120(a):

1. Failure to begin construction within 18 months of the date of issuance,
2. Discontinuance of construction for more than 18 months prior to completion, or
3. Failure to complete construction within a reasonable time.

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Re: Flexible Permit Number 84802

Upon request, the Texas Commission on Environmental Quality (TCEQ) Executive Director may grant extensions as allowed in 30 TAC § 116.120(b).

The limitations of 30 TAC § 116.120(a) do not apply to physical or operational changes allowed without an amendment under 30 TAC § 116.721 of this title (relating to Amendments and Alterations). [30 TAC § 116.715(c)(1)]

This permit is effective as of the date of this letter and will be in effect for ten years from the date of approval.

As of July 1, 2008, all analytical data generated by a mobile or stationary laboratory in support of compliance with air permits must be obtained from a NELAC (National Environmental Laboratory Accreditation Conference) accredited laboratory under the Texas Laboratory Accreditation Program or meet one of several exemptions. Specific information concerning which laboratories must be accredited and which are exempt may be found in 30 TAC §§ 25.4 and 25.6.

For additional information regarding the laboratory accreditation program and a list of accredited laboratories and their fields of accreditation, please see the following Web site:

[http://www.tceq.state.tx.us/compliance/compliance\\_support/qa/env\\_lab\\_accreditation.html](http://www.tceq.state.tx.us/compliance/compliance_support/qa/env_lab_accreditation.html)

For questions regarding the accreditation program, you may contact the Texas Laboratory Accreditation Program at (512) 239-3754 or by e-mail at [labprgms@tceq.state.tx.us](mailto:labprgms@tceq.state.tx.us).

You may file a **motion to overturn** with the Chief Clerk. A motion to overturn is a request for the commission to review the TCEQ Executive Director's approval of the application. Any motion must explain why the commission should review the TCEQ Executive Director's action. According to 30 TAC § 50.139, an action by the Executive Director is not affected by a motion to overturn filed under this section unless expressly ordered by the commission.

A motion to overturn must be received by the Chief Clerk within 23 days after the date of this letter. An original and 11 copies of a motion must be filed with the Chief Clerk in person or by mail. The Chief Clerk's mailing address is Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087. On the same day the motion is transmitted to the Chief Clerk, please provide copies to Mr. Robert Martinez, Director, Environmental Law Division, MC-173, and Mr. Blas J. Coy, Jr., Public Interest Counsel, MC-103, both at the same TCEQ address above. If a motion is not acted on by the commission within 45 days after the date of this letter, then the motion shall be deemed overruled.

Mr. J. F. Guelker

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Re: Flexible Permit Number 84802

You may also request **judicial review** of the TCEQ Executive Director's approval. According to Texas Health and Safety Code § 382.032, a person affected by the TCEQ Executive Director's approval must file a petition appealing the TCEQ Executive Director's approval in Travis County district court within 30 days after the effective date of the approval. Even if you request judicial review, you still must exhaust your administrative remedies, which includes filing a motion to overturn in accordance with the previous paragraphs.

Thank you for your cooperation and interest in air pollution control. If you need further information or have any questions, please contact Mr. John Barrientez at (512) 239-4786 or write to the Texas Commission on Environmental Quality, Office of Permitting and Registration, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

This action is taken under authority delegated by the Executive Director of the TCEQ.

Sincerely,



Richard A. Hyde, P.E., Director  
Air Permits Division  
Office of Permitting and Registration  
Texas Commission on Environmental Quality

RAH/JB/pw

Enclosures

cc: Air Section Manager, Region 1 - Amarillo

Project Number: 138104



# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

## AIR QUALITY PERMIT

A FLEXIBLE PERMIT IS HEREBY ISSUED TO

U.S. Department of Energy

AUTHORIZING THE CONSTRUCTION AND OPERATION OF

Pantex Plant

LOCATED AT Panhandle, Carson County, Texas

LATITUDE 35° 19' 27" LONGITUDE 101° 33' 19"



- Facilities covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the executive director of the Texas Commission on Environmental Quality (commission) to amend this permit in that regard and such amendment is approved. It shall be unlawful for any person to vary from such representation or flexible permit provision if the change will cause a change in the method of control of emissions, the character of the emissions, or will result in a significant increase in emissions, unless application is made to the executive director to amend the flexible permit in that regard and such amendment is approved by the executive director. [Title 30 Texas Administrative Code § 116.721 (30 TAC § 116.721)]**
- Voiding of Permit.** A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of the date of issuance, discontinues construction for more than 18 months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant an 18-month extension. Before the extension is granted the permit may be subject to revision based on best available control technology, lowest achievable emission rate, and netting or offsets as applicable. One additional extension of up to 18 months may be granted if the permit holder demonstrates that emissions from the facility will comply with all rules and regulations of the commission, the intent of the Texas Clean Air Act (TCAA), including protection of the public's health and physical property; and (b)(1) the permit holder is a party to litigation not of the permit holder's initiation regarding the issuance of the permit; or (b)(2) the permit holder has spent, or committed to spend, at least 10 percent of the estimated total cost of the project up to a maximum of \$5 million. A permit holder granted an extension under subsection (b)(1) of this section may receive one subsequent extension if the permit holder meets the conditions of subsection (b)(2) of this section. [30 TAC § 116.120(a), (b) and (c)]
- Construction Progress.** The start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC § 116.715(c)(2)]
- Start-up Notification.** The appropriate regional office of the commission and any local program having jurisdiction shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. Phased construction, which may involve a series of facilities commencing operations at different times, shall provide separate notification for the commencement of operations for each facility. Prior to beginning operations of the facilities authorized by the permit, the permit holder shall identify to the Office of Permitting and Registration the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program). [30 TAC § 116.715(c)(3)]
- Sampling Requirements.** If sampling of stacks or process vents is required, the flexible permit holder shall contact the commission's Engineering Services Section, Office of Compliance and Enforcement prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the appropriate regional office of the commission. The flexible permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC § 116.715(c)(4)]
- Equivalency of Methods.** It shall be the responsibility of the flexible permit holder to demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the flexible permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the permit. [30 TAC § 116.715(c)(5)]
- Recordkeeping.** A copy of the flexible permit along with information and data sufficient to demonstrate continuous compliance with the emission caps and individual emission limitations contained in the flexible permit shall be maintained in a file at the plant site and made available at the request of personnel from the commission or any air pollution control program having jurisdiction. For facilities that normally operate unattended, this information shall be maintained at the nearest staffed location within Texas specified by the permit holder in the permit application. This information may include, but is not limited to, emission cap and individual emission limitation calculations based on a 12-month rolling basis and production records and operating hours. Additional recordkeeping requirements may be specified in special conditions attached to the flexible permit. Information in the file shall be retained for at least two years following the date that the information or data is obtained. [30 TAC § 116.715(c)(6)]
- Maximum Allowable Emission Rates.** A flexible permit covers only those sources of emissions and those air contaminants listed in the table entitled "Emission Sources, Emissions Caps and Individual Emission Limitations" attached to the flexible permit. Flexible permitted sources are limited to the emission limits and other conditions specified in the table attached to the flexible permit. [30 TAC § 116.715(c)(7)]
- Emission Cap Readjustment.** If a schedule to install additional controls is included in the flexible permit and a facility subject to such a schedule is taken out of service, the emission cap contained in the flexible permit will be readjusted for the period the unit is out of service to a level as if no schedule had been established. Unless a special provision specifies the method of readjustment of the emission cap, a permit alteration shall be obtained. [30 TAC § 116.715(c)(8)]
- Maintenance of Emission Control.** The facilities covered by the flexible permit shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. Notification for emissions events and scheduled maintenance shall be made in accordance with §§ 101.201 and 101.211 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; and Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping). [30 TAC § 116.715(c)(9)]
- Compliance with Rules.** Acceptance of a flexible permit by a permit applicant constitutes an acknowledgment and agreement that the holder will comply with all Rules, Regulations, and Orders of the commission issued in conformity with the Texas Clean Air Act (TCAA) and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or flexible permit condition are applicable, then the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the flexible permit. [30 TAC § 116.715(c)(10)]
- This permit may be appealed pursuant to 30 TAC § 50.139.
- This permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC § 116.110(e)]
- There may be additional special conditions attached to a flexible permit upon issuance or amendment of the permit. Such conditions in a flexible permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC § 116.715(d)]
- Emissions from this facility must not cause or contribute to a condition of "air pollution" as defined in TCAA § 382.003(3) or violate TCAA § 382.085, as codified in the Texas Health and Safety Code. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.**

FLEXIBLE PERMIT 84802

Date: May 5, 2009

For the Commission

## SPECIAL CONDITIONS

PERMIT NUMBER 84802

### EMISSION STANDARDS – MAXIMUM ALLOWABLE EMISSION RATES:

1. This permit covers only those sources of emissions listed in Table 1 (Emission Point Summary). Those sources are limited to the emission rates listed in the “Emission Sources - Maximum Allowable Emission Rates,” Table which is part of Permit Number 84802.
2. Emissions from this facility must not cause or contribute to a condition of “air pollution” as defined in Section 382.003 of the Texas Health and Safety Code Ann. or violate § 382.085 of the Texas Health and Safety Code Ann. If the Executive Director of the TCEQ determines that such a condition or violation occurs, the permittee shall implement additional abatement measures as necessary to control or prevent the condition or violation.
3. Title 30 Texas Administrative Code (30 TAC) Chapter 111, is not applicable to the emissions from EPN Numbers X011 X015, X022, X023, X026, X029, X030, Y005, Y006, Y007, Y008, Y009, Y010, Y011, Y012, Y013 and Y014, as these are not stationary vents. The emission rates from these units are limited by this permit.
4. All emission control systems for F022 PS-1, F022 PS-2 and F022 PS-3, I015NR, I016SR, and T028P1 shall be operating as specified in the application on which this permit was issued before process operations can be conducted.
5. The chemicals emitted from units identified in Table 1 are limited to those identified in the permit application dated 4/28/2008. This permit condition does not authorize the modification of an existing facility or the construction of a new facility at the site or the increase of emissions represented in the permit application. New chemicals may be added through the use of the procedure below, or 30 TAC Chapter 106, or 30 TAC Chapter 116.
  - A. Short-term (pounds per hour [lb/hr]) and annual (TPY) emissions and calculations shall be completed for each chemical at each affected source. Emission rates (ER) shall be calculated in accordance with the methods as documented in the permit application dated 4/28/2008. The calculated ER shall not exceed the maximum allowable emission rates table.
  - B. The Effect Screening Level (ESL) for the material shall be obtained from the current TCEQ ESL list or by written request to the TCEQ Toxicology Section.

SPECIAL CONDITIONS

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C. The total emissions of any new chemical from all emission points in this permit must satisfy one of the following conditions:

(1) The total maximum ER from all sources is less than 0.04 lb/hr and the ESL greater than 2 ug/m<sup>3</sup>; or

(2)  $(ER/ESL)_N \leq (ER/ESL)_E$

$(ER/ESL)_N$  = maximum hourly ER of new compound(s) divided by its ESL

$(ER/ESL)_E$  = the highest ratio of any previously authorized compounds hourly ER divided by its ESL)

This may only be used for one emission point at a time.

D. The permit holder shall maintain records of the information below and the demonstrations in steps A through C above. The following documentation is required for each compound:

(1) Chemical name(s), composition, and chemical abstract registry number if available.

(2) Molecular weight.

(3) The unit where the chemical is to be emitted and the emission control device to be utilized if any.

(4) The date the new chemical is first emitted.

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Table 1: Emission Point Summary

Emission Point No (1)	Source Name (2)
H018	Dual Chamber Incinerator
H025	Plastic Shop
T010	Vehicle Fueling Facilities
Y002	Refrigeration Units
A005	Natural Gas Pipeline
I033 & I034	Van de Graff Generators
Y003	Load Leveling Engines
Y004	Stationary Standby Emergency Engines
N030	Drying Ovens
I015 NR	HE Formulation North Rotoclon
I016 SR	HE Formulation South Rotoclon
I014FUG	HE Formulation Fugitives
F022 PS-1	HE Synthesis PS-1
F022 PS-2	HE Synthesis PS-2
F022 PS-3	HE Synthesis PS-3
F022 PS-4	HE Synthesis PS-4
F022 Com Fug	HE Synthesis Fugitive
F022 TK1	HE Synthesis TK 1
F022 TK2	HE Synthesis TK 2
F022 TK3	HE Synthesis TK 3
F022 TK4	HE Synthesis TK 4
F022VPC	HE Synthesis Vac Pump Condensate
E002CT	Cooling Tower
D026CT	Cooling Tower
F022CT	Cooling Tower
H005CT	Cooling Tower
I014CT	Cooling Tower
K009CT	Cooling Tower
M004CT	Cooling Tower
O003CT1	Cooling Tower
O003CT2	Cooling Tower
P029CT	Cooling Tower
R024CT	Cooling Tower
R030CT	Cooling Tower
S006CT	Cooling Tower
S009CT1	Cooling Tower
S009CT2	Cooling Tower
F026CT1	Cooling Tower

Emission Point No (1)	Source Name (2)
F026CT2	Cooling Tower
T024B1	Boiler 1
T024B2	Boiler 2
T024B3	Boiler 3
T024B4	Boiler 4
T024T1	Diesel Tank
T029	Vial Crusher
R022E1	Standby Diesel Generators
R022E2	Standby Diesel Generators
R022E3	Standby Diesel Generators
X011	Firing Site
X015	Firing Site
X022	Firing Site
X023	Firing Site
X026	Firing Site
X029	Firing Site
X030	Firing Site
X031A	Firing Site
X031B	Firing Site
E015	Firing Site
E034B	Firing Site
Y005	BG-Burning Pan-1
Y006	BG Tray 1
Y007	BG Tray-2
Y008	BG Tray-3
Y009	BG Tray-4
Y010	BG Tray-5
Y011	BG Tray-6
Y012	BG Burning Pan-7
Y013	BG Tray-8
Y014	BG Tray-9
Y015	BG Flashing Chamber
T028P1	Hazardous Waste Processing
T028P2	Hazardous Waste Processing
B010	Hazardous Waste Storage Unit
B032	Hazardous Waste Storage Unit
W024	Hazardous Waste Storage Unit
W025	Hazardous Waste Storage Unit
T027	Hazardous Waste Storage Unit

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## OPERATIONAL CONDITIONS

6. Operations at units that emit from Emission Points Y005, Y006, Y007, Y008, Y009, Y010, Y011, Y012, Y013, Y014, Y015, X011, X015, X022, X023, X026, X029, X030, X031A, X031B, E015, and E034B are limited to those materials, and combinations of those materials, listed in the application on which this permit was issued. Other materials may be processed at these units, provided that the permittee meets the following conditions:
  - A. The permittee will determine where among the following classifications the new energetic is most appropriately grouped: inorganic; aromatic energetics (containing a benzene ring); "heterocyclic" energetics containing alternating carbon-nitrogen bonds (e.g., RDX); aliphatic energetics containing a branched straight chain carbon backbone; or a mixture containing two or more energetics from one or more of the classes;
  - B. The permittee will assign the highest (or greatest) relevant and appropriate emission factors within any class to the proposed energetic, as identified in the application on which this permit was issued. New mixtures will be assigned emission factors based on the highest emission factors for the involved classes, adjusted for the relative weight percentage of each class. "Relevant and appropriate," in this context, means that emission of a contaminant may occur, based on process knowledge;
  - C. Emission factors for energetics may be modified from those developed under above paragraph, when:
    - (1) The emission factors for the energetic are published or obtained from a recognized, authoritative source, such as the U. S. Environmental Protection Agency or U.S. Department of Energy or the U.S. Department of Defense; or
    - (2) Thermodynamic modeling is conducted for the energetic based on the methodology described on the application on which this permit is issued.
  - D. Identify the appropriate short-term and long-term Effects Screening Levels (ESLs) for each compound through contact with the TCEQ Toxicology and Risk Assessment Section in Austin.
  - E. Update modeling results submitted to the TCEQ in support of the application on which this permit was issued using TCEQ Modeling Division approved ratioing techniques;

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- F. Predicted off-property impacts are to be compared to the Effects Screening Level (ESL) from the most recent ESL list published by the TCEQ. If the compound of concern does not have a published ESL at the time the analysis is initiated, the Commission will designate an appropriate level of this compound;
  - G. If an ESL is exceeded, this permit shall be amended. The permittee will notify the TCEQ of all new energetics or new emission factors for energetics that will be processed in amounts greater than five pounds per year.
7. Containers that emit from Emission Points B010, B032, W024, W025, and T027 shall not be opened at any time except for the purpose of sampling, transferring, treating, or repackaging the material. During such occurrences:
- A. The top of the container(s) shall be opened only for the minimum time necessary to extract a sample or transfer the material. The maximum number of containers that shall be opened per hour in any of the units listed above shall be:
    - (1) Four (4) containers containing carbon disulfide;
    - (2) Eight (8) containers containing trichlorofluoromethane;
    - (3) Ten (10) containers containing chlorofluorocarbons, carbon tetrachloride, ethylene dichloride, methylene chloride (dichloromethane), or ethyl ether;
    - (4) 45 containers of all other authorized materials may be opened per hour in each of any three listed above, or an accumulative total of 135 containers per hour of all other authorized waste may be opened in Units W024, W025, and T027 in any one hour.
8. The operations at Units Y005, Y006, Y007, Y008, Y009, Y010, Y011, Y012, Y013, Y014, and Y015 shall also have the following limitations:
- A. The amount of energetic materials thermally processed shall be limited to 200 tons per year;
  - B. Operations shall not commence before one-half hour after published time of sunrise nor continue past one-half hour before the published time of sunset;
  - C. Operations shall not commence when the sustained wind speed is greater than 13 meters per second or during inclement weather that would contribute to hazards to personnel handling explosives or would prohibit a complete, successful operation;

SPECIAL CONDITIONS

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- D. Operations shall not occur during times with surface-based or large-scale atmospheric temperature inversions that can reduce vertical mixing. Operations shall not occur during times that a "Stagnation Advisory" is in effect for the area including the Pantex Plant, as issued by the National Weather Service;
- E. No more than 1500 pounds (total) of energetic material(s) shall be processed in any one hour period in any combination of these units. All maximum operational amounts per unit will be limited by written DOE directives and provisions of the permit;
- F. For each operation, the permittee shall:
  - (1) Observe the operation;
  - (2) Observe the products of the operation for minimum of 30 minutes after flame and/or smoke are last observed;
  - (3) Inspect the unit after the minimum time referenced above and when safe to do so, to ensure complete combustion and the absence of fire and explosive hazards before leaving the Burning Ground.
- G. To determine if events on one or more units can be executed within the same one-hour window, Pantex will:
  - (1) Calculate the maximum allowable emission rate for each unit based on the heat release expected from each unit from the appropriate curve;
  - (2) Divide the actual expected emission rate for each unit by the allowable emission rate for each unit;
  - (3) Determine the sum of the fractions calculated in Step (2) for all units. If the sum calculated is less than or equal to 1.0, the event may proceed. If the sum is greater than 1.0, an exceedance of the limit is predicted, and the composition of the operation must be adjusted such that the maximum allowable limit will not be exceeded.

## SPECIAL CONDITIONS

Permit Number 84802

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### RECORDKEEPING REQUIREMENTS

9. Records shall be maintained of estimated emissions to the atmosphere on a rolling 12-month basis for the emissions points listed in Table 1 entitled "Emission Point Summary" of this Permit. Compliance with "Maximum Allowable Emission Rates" Table shall be determined on a monthly basis and will be based on the methods and emission factors included in the application on which this permit was issued.

The recordkeeping programs for all facilities authorized by this permit shall be established and maintained such that the ability to demonstrate compliance with all short-term and annual emission caps in the MAERT are ensured. Records of process parameters for sources contributing to the allowable emission rate caps, and which may be necessary to demonstrate compliance with them, shall be maintained for a period of two years after the date they were made. These and all other records required by any previous condition of this permit shall be made available to the TCEQ Executive Director or his representative upon request.

10. For each event at units Y005, Y006, Y007, Y008, Y009, Y010, Y011, Y012, Y013, Y014, Y015, X011, X015, X022, X023, X026, X029, X030, X031A, X031B, E015, and E034B the Permittee shall record:
  - A. The heat release rate for the operation from the heat of combustion of each energetic;
  - B. The mass or weight of each energetic to be processed;
  - C. The estimated time of the event;
  - D. The date, initiation time of the event, unit name or number on which the event occurred;
  - E. The amount of auxiliary fuel introduced;
  - F. The weight of any other material involved in the event;
  - G. The emissions generated from the event based on the methodology described in the application on which this permit was issued;
  - H. The calculated hourly emission rate using the methods described in the application on which this permit was issued.

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EMISSION STANDARDS, FUEL SPECIFICATIONS, AND WORK PRACTICES

11. Fuel for engines authorized by this permit shall be either sweet natural gas, as defined in the Title 30 Texas Administrative Code Chapter 101, diesel (or No. 2 Fuel Oil) or gasoline. All liquid fuels must be first-run, refinery grade and shall not consist of a blend containing waste oils or solvents. Use of any other fuel will require prior approval of the Executive Director of the Texas Commission on Environmental Quality (TCEQ).

PROCESS VENTS AND EQUIPMENT LEAKS

- 12 Requirements for Title 40 of the Code of Federal Regulations Part 264, Subparts AA, BB, and CC:
  - A. The permittee must comply with the requirements of 30 TAC § 335.152(a)(17)/40 CFR Part 264 Subpart AA and 30 TAC § 335.152(a)(18)/40 CFR Part 264 Subpart BB, as applicable;
  - B. The permittee must comply with the requirements of 40 CFR Part 264 Subpart CC, as applicable.

MSS CONDITIONS

13. This permit authorizes the emissions for the maintenance, startup, and shutdown (MSS) activities summarized in the MSS Activity Summary (Attachment A) attached to this permit.

The performance of each MSS activity and the emissions associated with it shall be recorded and include at least the following information:

- A. The physical location at which emissions from the MSS activity occurred, including the emission point number and common name for the point at which the emissions were released into the atmosphere;
- B. The type of MSS activity and the reason for the activity;
- C. The common name and the facility identification number, if applicable, of the facilities at which the MSS activity and emissions occurred;
- D. The date and time of the MSS activity and its duration;

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- E. The estimated quantity of each air contaminant, or mixture of air contaminants, emitted with the data and methods used to determine it. The emissions shall be estimated using the methods identified in the permit application, consistent with good engineering practice.
  - F. All MSS emissions shall be summed monthly and the rolling 12-month emissions shall be updated on a monthly basis.
14. If the removal of a component for repair or replacement results in an open-ended line or valve, the open ended line is exempt from any NSR permit condition requirement to install a cap, blind flange, plug, or second valve for 24 hours. If the repair or replacement is not completed within 72 hours, the permit holder must comply with either of the following;
- A. A cap, blind flange, plug, or second valve must be installed on the line or valve; or
  - B. The open-ended line or valve shall be monitored on a daily basis to confirm that there is no leakage. This check shall be performed in accordance with the applicable NSR permit condition for fugitive emission monitoring except that the leak threshold shall be any reading greater than background. The results of this daily check shall be recorded.

Date: May 5, 2009

Attachment A

MSS ACTIVITY SUMMARY

<b>Facilities</b>	<b>Description</b>	<b>Emissions Activity</b>	<b>EPN</b>
Refrigeration Units	Repair and Maintenance	Venting to atmosphere	Y002
Natural Gas Pipeline	Repair and Maintenance	Venting to atmosphere	A005
Van de Graff Generators	Repair and Maintenance	Venting to atmosphere	I003 and I004

Date: May 5, 2009

SPECIAL CONDITIONS

Permit Number 84802

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Attachment B

FACILITY LIST

This permit authorizes MSS emissions from the permanent site facilities identified below. Emissions may occur from temporary facilities (frac tanks, containers, vacuum trucks, facilities used for painting or abrasive blasting, portable control devices or controlled recovery systems) to support the MSS activities performed at the permanent site facilities listed below as represented in the permit application. The headings for each group of facilities (Process Units, Tanks, etc) are used in the MSS Activity Summary to identify all facilities in the respective group.

**Process Units**

<u>Description</u>	<u>EPN</u>
Refrigeration Units	Y002
Natural Gas Pipeline	A005
Van de Graff Generators	I003 and I004

Date: May 5, 2009

## EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Permit Numbers 84802

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

### AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
CAP1	Flex Cap (4)	NO <sub>x</sub>	670	92.88
		CO	5,119	28.33
		VOC	407	25.72
		SO <sub>2</sub>	109	5.14
		PM <sub>10</sub>	179	18.24
		HF	114	2.00
		HAP		13.15

- (1) Emission point identification - either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources use area name or fugitive source name.
- (3) NO<sub>x</sub> - total oxides of nitrogen  
 CO - carbon monoxide  
 VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1.  
 SO<sub>2</sub> - sulfur dioxide  
 PM<sub>10</sub> - it shall be assumed that all particulate matter emitted will be particulate matter less than 10 microns.  
 HF - hydrogen fluoride  
 HAP - hazardous Air Pollutants
- (4) Includes the sources listed in special conditions, Table 1.

\* Emission rates are based on and the facilities are limited by the following maximum operating schedule:

24 Hrs/day 7 Days/week 52 Weeks/year or 8,760 Hrs/year

\*\* Compliance with annual emission limits is based on a rolling 12-month period.

Dated: May 5, 2009