

**From:** Savannah Quiros  
**Sent:** Tuesday, July 30, 2024 8:38 AM  
**To:** Bill Garris  
**Cc:** kara.derocha@arcadis.com  
**Subject:** RE: Update - FOP O4449/Project 35000, Starpak LLC/Starpak Houston Facility

Hi Bill,

Yes, I am working with our initial response team and IT to fix the issue. I'm hoping we can resolve it within the next few days.

Best,

Savannah Quiros (x1228)  
(they/them/theirs)  
Permit Reviewer – Title V

---

**From:** Bill Garris <[bgarris@fivestarmanagement.com](mailto:bgarris@fivestarmanagement.com)>  
**Sent:** Monday, July 29, 2024 9:57 AM  
**To:** Savannah Quiros <[Savannah.Quiros@tceq.texas.gov](mailto:Savannah.Quiros@tceq.texas.gov)>  
**Cc:** [kara.derocha@arcadis.com](mailto:kara.derocha@arcadis.com)  
**Subject:** RE: Update - FOP O4449/Project 35000, Starpak LLC/Starpak Houston Facility

Savannah,

Any update on this issue?

Regards,

William Garris  
Five Star  
(336) 462-7064 (M)  
(832) 782-5613 (O)

---

**From:** Savannah Quiros <[Savannah.Quiros@tceq.texas.gov](mailto:Savannah.Quiros@tceq.texas.gov)>  
**Sent:** Friday, July 19, 2024 3:07 PM  
**To:** Bill Garris <[bgarris@fivestarmanagement.com](mailto:bgarris@fivestarmanagement.com)>  
**Cc:** [kara.derocha@arcadis.com](mailto:kara.derocha@arcadis.com)  
**Subject:** Update - FOP O4449/Project 35000, Starpak LLC/Starpak Houston Facility

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Hi Bill,

**From:** Savannah Quiros  
**Sent:** Friday, July 19, 2024 3:07 PM  
**To:** Bill Garris  
**Cc:** kara.derocha@arcadis.com  
**Subject:** Update - FOP 04449/Project 35000, Starpak LLC/Starpak Houston Facility

Hi Bill,

Unfortunately, I don't have much of an update for you. The Microsoft outage has affected the APD pretty harshly: our information management system is down. It's been down since this morning but I was hoping it would be back up in time for me to properly look into the RO/DAR forms we talked about. I will look into the issue again on Monday, when hopefully everything is up and running.

Best,

Savannah Quiros (x1228)  
(they/them/theirs)  
Permit Reviewer – Title V

**From:** Savannah Quiros  
**Sent:** Thursday, July 18, 2024 4:22 PM  
**To:** Bill Garris; Ignacio Aguirre  
**Cc:** 'DeRocha, Kara'  
**Subject:** RE: Working Draft Permit - FOP O4449/Project 35000, Starpak LLC/Starpak Houston Facility

Do you know when you'll be able to send this to me through STEERS? My team leader is asking about it and we want to send the Public Notice Authorization Package out this week.

Best,

Savannah Quiros (x1228)  
(they/them/theirs)  
Permit Reviewer – Title V

---

**From:** Savannah Quiros  
**Sent:** Wednesday, July 17, 2024 11:14 AM  
**To:** Bill Garris <[bgarris@fivestarmanagement.com](mailto:bgarris@fivestarmanagement.com)>; Ignacio Aguirre <[IAguirre@starpakltd.com](mailto:IAguirre@starpakltd.com)>  
**Cc:** 'DeRocha, Kara' <[Kara.DeRocha@arcadis.com](mailto:Kara.DeRocha@arcadis.com)>  
**Subject:** RE: Working Draft Permit - FOP O4449/Project 35000, Starpak LLC/Starpak Houston Facility

Hi Bill,

Currently Ignacio is both the RO and the DAR, this is not allowed. Please submit a form OP-DEL (sections I and IV) to delete Ignacio as a DAR. I also need the OP-CRO1 again with the same time period, but Ignacio needs to check the "RO" box under the Certification Type, and put "RO" in the Certification of Truth section.

Best,

Savannah Quiros (x1228)  
(they/them/theirs)  
Permit Reviewer – Title V

---

**From:** Bill Garris <[bgarris@fivestarmanagement.com](mailto:bgarris@fivestarmanagement.com)>  
**Sent:** Tuesday, July 16, 2024 2:56 PM  
**To:** Savannah Quiros <[Savannah.Quiros@tceq.texas.gov](mailto:Savannah.Quiros@tceq.texas.gov)>; Ignacio Aguirre <[IAguirre@starpakltd.com](mailto:IAguirre@starpakltd.com)>  
**Cc:** 'DeRocha, Kara' <[Kara.DeRocha@arcadis.com](mailto:Kara.DeRocha@arcadis.com)>  
**Subject:** RE: Working Draft Permit - FOP O4449/Project 35000, Starpak LLC/Starpak Houston Facility

Forms submitted..

Regards,

William Garris  
Five Star

**From:** Savannah Quiros  
**Sent:** Wednesday, July 17, 2024 11:14 AM  
**To:** Bill Garris; Ignacio Aguirre  
**Cc:** 'DeRocha, Kara'  
**Subject:** RE: Working Draft Permit - FOP O4449/Project 35000, Starpak LLC/Starpak Houston Facility

Hi Bill,

Currently Ignacio is both the RO and the DAR, this is not allowed. Please submit a form OP-DEL (sections I and IV) to delete Ignacio as a DAR. I also need the OP-CRO1 again with the same time period, but Ignacio needs to check the "RO" box under the Certification Type, and put "RO" in the Certification of Truth section.

Best,

Savannah Quiros (x1228)  
(they/them/theirs)  
Permit Reviewer – Title V

---

**From:** Bill Garris <[bgarris@fivestarmanagement.com](mailto:bgarris@fivestarmanagement.com)>  
**Sent:** Tuesday, July 16, 2024 2:56 PM  
**To:** Savannah Quiros <[Savannah.Quiros@tceq.texas.gov](mailto:Savannah.Quiros@tceq.texas.gov)>; Ignacio Aguirre <[IAguirre@starpakltd.com](mailto:IAguirre@starpakltd.com)>  
**Cc:** 'DeRocha, Kara' <[Kara.DeRocha@arcadis.com](mailto:Kara.DeRocha@arcadis.com)>  
**Subject:** RE: Working Draft Permit - FOP O4449/Project 35000, Starpak LLC/Starpak Houston Facility

Forms submitted..

Regards,

William Garris  
Five Star  
(336) 462-7064 (M)  
(832) 782-5613 (O)

---

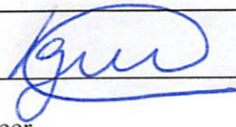
**From:** Savannah Quiros <[Savannah.Quiros@tceq.texas.gov](mailto:Savannah.Quiros@tceq.texas.gov)>  
**Sent:** Monday, July 15, 2024 2:07 PM  
**To:** Bill Garris <[bgarris@fivestarmanagement.com](mailto:bgarris@fivestarmanagement.com)>; Ignacio Aguirre <[IAguirre@starpakltd.com](mailto:IAguirre@starpakltd.com)>  
**Cc:** 'DeRocha, Kara' <[Kara.DeRocha@arcadis.com](mailto:Kara.DeRocha@arcadis.com)>  
**Subject:** RE: Working Draft Permit - FOP O4449/Project 35000, Starpak LLC/Starpak Houston Facility

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Hi Bill,

**Form OP-CRO1**  
**Certification by Responsible Official**  
**Federal Operating Permit Program**

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

<b>I. Identifying Information</b>					
RN: 102886819		CN: 605931682		Account No.: HGA026Z	
Permit No.: O4449			Project No.:		
Area Name: StarPak			Company Name: StarPak LLC		
<b>II. Certification Type</b> <i>(Please mark the appropriate box)</i>					
<input type="checkbox"/> Responsible Official			<input checked="" type="checkbox"/> Duly Authorized Representative		
<b>III. Submittal Type</b> <i>(Please mark the appropriate box) (Only one response can be accepted per form)</i>					
<input type="checkbox"/> SOP/TOP Initial Permit Application		<input checked="" type="checkbox"/> Update to Permit Application			
<input type="checkbox"/> GOP Initial Permit Application		<input type="checkbox"/> Permit Revision, Renewal, or Reopening			
<input type="checkbox"/> Other: _____					
<b>IV. Certification of Truth</b>					
<b>This certification does not extend to information which is designated by the TCEQ as information for reference only.</b>					
I, <u>Ignacio Aguirre</u> certify that I am the <u>DAR</u> <div style="text-align: center;"><i>(Certifier Name printed or typed)</i> <span style="margin-left: 100px;"><i>(RO or DAR)</i></span></div>					
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:					
<i>Note: Enter Either a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>					
Time Period: From <u>04-07-2023</u> to <u>07-16-2024</u> <div style="text-align: center;"><i>Start Date</i> <span style="margin-left: 150px;"><i>End Date</i></span></div>					
Specific Dates: _____ <div style="text-align: center;"><i>Date 1</i> <span style="margin-left: 50px;"><i>Date 2</i></span> <span style="margin-left: 50px;"><i>Date 3</i></span> <span style="margin-left: 50px;"><i>Date 4</i></span> <span style="margin-left: 50px;"><i>Date 5</i></span> <span style="margin-left: 50px;"><i>Date 6</i></span></div>					
Signature: <u></u> Signature Date: <u>07-16-2024</u>					
Title: <u>Plant Engineer</u>					

**Texas Commission on Environmental Quality**  
**Application Area-Wide Applicability Determinations and General Information**  
**Form OP-REQ1**  
**Federal Operating Permit Program**

Date:	07/16/2024
Permit No.:	O-4449
RN No.:	102886819

*For SOP applications, answer ALL questions unless otherwise directed.*

◆ *For GOP applications, answer ONLY these questions unless otherwise directed.*

<b>Form OP-REQ1: Page 87</b>			
<b>XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)</b>			
<b>E. PSD Permits and PSD Major Pollutants</b>			
PSD Permit No.:	Issuance Date:	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
PSD Permit No.:	Issuance Date:	Pollutant(s):	
If PSD Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: <a href="http://www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html">www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html</a> .			
<b>F. Nonattainment (NA) Permits and NA Major Pollutants</b>			
NA Permit No.:	Issuance Date:	Pollutant(s):	
NA Permit No.:	Issuance Date:	Pollutant(s):	
NA Permit No.:	Issuance Date:	Pollutant(s):	
NA Permit No.:	Issuance Date:	Pollutant(s):	
If NA Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: <a href="http://www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html">www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html</a> .			
<b>G. NSR Authorizations with FCAA § 112(g) Requirements</b>			
NSR Permit No.: 108176	Issuance Date: 06/26/2024	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
◆ <b>H. Title 30 TAC Chapter 116 Permits, Special Permits, Standard Permits, Other Authorizations (Other Than Permits By Rule, PSD Permits, NA Permits) for the Application Area</b>			
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:

Two things:

1. There is a newer issuance date for NSR 108176; it's a revision dated 06/26/2024. Would you like to incorporate this latest revision into the Title V Permit? If yes, I'll need an updated OP-REQ1 sent through STEERS.
2. I need an OP-CRO1 signed by the RO, Ignacio Aguirre sent through STEERS. Please use the time range of 04/07/2024 to when you submit the information requested Whether or not you decide to include the latest NSR 108176 revision, I would still need this form.

Best,

Savannah Quiros (x1228)  
(they/them/theirs)  
Permit Reviewer – Title V

---

**From:** Savannah Quiros  
**Sent:** Wednesday, June 26, 2024 10:28 AM  
**To:** Bill Garris <[bgarris@fivestarmanagement.com](mailto:bgarris@fivestarmanagement.com)>  
**Cc:** 'DeRocha, Kara' <[Kara.DeRocha@arcadis.com](mailto:Kara.DeRocha@arcadis.com)>  
**Subject:** RE: Working Draft Permit - FOP 04449/Project 35000, Starpak LLC/Starpak Houston Facility

Hi Bill,

I've received the OP-CRO1 and OP-DEL forms. Thank you!

Sincerely,

Savannah G. Quiros  
(they/them/theirs)  
Permit Reviewer  
TCEQ – APD – OP Section (Title V)  
(512) 239-1228



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---

**From:** Bill Garris <[bgarris@fivestarmanagement.com](mailto:bgarris@fivestarmanagement.com)>  
**Sent:** Friday, June 21, 2024 2:29 PM  
**To:** Savannah Quiros <[Savannah.Quiros@tceq.texas.gov](mailto:Savannah.Quiros@tceq.texas.gov)>  
**Cc:** 'DeRocha, Kara' <[Kara.DeRocha@arcadis.com](mailto:Kara.DeRocha@arcadis.com)>  
**Subject:** RE: Working Draft Permit - FOP 04449/Project 35000, Starpak LLC/Starpak Houston Facility

Savannah,

We sent the OP-CRO1 and OP-DEL FedEx on 6/18/24 and tracked delivery (776920848853) to Wednesday, 6/19 at 8:49 AM. Can you confirm receipt for these documents. Thank you in advance.



Regards,

William Garris  
Five Star  
9690 W.Wingfoot Road  
Houston, Tx 77041

832 782-5613 (O)  
336 462-7064 (M)

---

**From:** Bill Garris  
**Sent:** Friday, June 14, 2024 2:44 PM  
**To:** Savannah Quiros <[Savannah.Quiros@tceq.texas.gov](mailto:Savannah.Quiros@tceq.texas.gov)>; DeRocha, Kara <[Kara.DeRocha@arcadis.com](mailto:Kara.DeRocha@arcadis.com)>  
**Cc:** Elizabeth Moorhead <[elizabeth.moorhead@tceq.texas.gov](mailto:elizabeth.moorhead@tceq.texas.gov)>  
**Subject:** RE: Working Draft Permit - FOP O4449/Project 35000, Starpak LLC/Starpak Houston Facility

Savannah,

We have prepared the OP-CR01 for signature; but, Alex (RO) is out of the office and we have been unable to reach him as yet. I'm sure we'll talk with him soon; but, this may move our mailing to Monday. We'll do our best to get this to you ASAP.

Regards,

William Garris  
Five Star  
(336) 462-7064 (M)  
(832) 782-5613 (O)

---

**From:** Savannah Quiros <[Savannah.Quiros@tceq.texas.gov](mailto:Savannah.Quiros@tceq.texas.gov)>  
**Sent:** Friday, June 14, 2024 10:59 AM  
**To:** DeRocha, Kara <[Kara.DeRocha@arcadis.com](mailto:Kara.DeRocha@arcadis.com)>  
**Cc:** Bill Garris <[bgarris@fivestarmanagement.com](mailto:bgarris@fivestarmanagement.com)>; Elizabeth Moorhead <[elizabeth.moorhead@tceq.texas.gov](mailto:elizabeth.moorhead@tceq.texas.gov)>  
**Subject:** RE: Working Draft Permit - FOP O4449/Project 35000, Starpak LLC/Starpak Houston Facility

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No worries, I know that NSR and Title V have different criteria for certifications that can be confusing. You can definitely mail in the wet-ink OP-CRO1, we just prefer the STEERS updates. I only need the OP-CRO1 mailed in (with the time period of 04/07/2024 to 06/14/2024); just be sure to mail it to my attention.

Sincerely,



Savannah G. Quiros  
Permit Reviewer  
TCEQ – APD – OP Section (Title V)  
(512) 239-1228



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---

**From:** DeRocha, Kara <[Kara.DeRocha@arcadis.com](mailto:Kara.DeRocha@arcadis.com)>  
**Sent:** Friday, June 14, 2024 10:12 AM  
**To:** Savannah Quiros <[Savannah.Quiros@tceq.texas.gov](mailto:Savannah.Quiros@tceq.texas.gov)>  
**Cc:** Bill Garris <[bgarris@fivestarmanagement.com](mailto:bgarris@fivestarmanagement.com)>; Elizabeth Moorhead <[elizabeth.moorhead@tceq.texas.gov](mailto:elizabeth.moorhead@tceq.texas.gov)>  
**Subject:** Re: Working Draft Permit - FOP O4449/Project 35000, Starpak LLC/Starpak Houston Facility

Hi Savannah, thank you for pointing me in the right direction. In reading through the guidance document, it appears that we can mail in the OP-CRO1 (page 37, IV.3). Is that correct? If so, we will likely choose this option as our RO does not have a STEERS account. Are there any other forms that we would need to include in the hard copy submittal other than the OP-CRO1?

Thank you,  
Kara

**Kara Z. DeRocha (she/her)**

Senior Air Quality Specialist, Program Manager, EHS Solutions Leader for Life Sciences Sector  
[kara.derocha@arcadis.com](mailto:kara.derocha@arcadis.com)

**Arcadis** | Arcadis U.S., Inc.

10205 Westheimer Road, Suite 800 | Houston, TX | 77042 | USA

T. +1 713 953 4747  
[www.arcadis.com](http://www.arcadis.com)

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**From:** Savannah Quiros <[Savannah.Quiros@tceq.texas.gov](mailto:Savannah.Quiros@tceq.texas.gov)>  
**Sent:** Friday, June 14, 2024 9:10 AM  
**To:** DeRocha, Kara <[Kara.DeRocha@arcadis.com](mailto:Kara.DeRocha@arcadis.com)>  
**Cc:** Bill Garris <[bgarris@fivestarmanagement.com](mailto:bgarris@fivestarmanagement.com)>; Elizabeth Moorhead <[elizabeth.moorhead@tceq.texas.gov](mailto:elizabeth.moorhead@tceq.texas.gov)>  
**Subject:** RE: Working Draft Permit - FOP 04449/Project 35000, Starpak LLC/Starpak Houston Facility

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Good morning Kara,

In the screenshot I sent, the certification portion reads “I certify that I am the Responsible Official for this application...” Ignacio Aguirre is not a registered Responsible Official so he cannot certify the documents through STEERS.

STEERS Guidance: [TCEQ RG-531c - A Guide to Obtaining Title V Permits in STEERS ePermits \(texas.gov\)](#), Page 37 has more information about signing/certifying the application, IV.4. “...A “Ready to Sign” message will appear in the Status column. Sign into STEERS **using the RO or DAR Signer account**, select the application that is ready to be signed and click on the “Sign” button at the bottom.”

Sincerely,

Savannah G. Quiros  
Permit Reviewer  
TCEQ – APD – OP Section (Title V)  
(512) 239-1228



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---

**From:** DeRocha, Kara <[Kara.DeRocha@arcadis.com](mailto:Kara.DeRocha@arcadis.com)>  
**Sent:** Friday, June 14, 2024 8:44 AM  
**To:** Savannah Quiros <[Savannah.Quiros@tceq.texas.gov](mailto:Savannah.Quiros@tceq.texas.gov)>

**Cc:** Bill Garris <[bgarris@fivestarmanagement.com](mailto:bgarris@fivestarmanagement.com)>; Elizabeth Moorhead <[elizabeth.moorhead@tceq.texas.gov](mailto:elizabeth.moorhead@tceq.texas.gov)>

**Subject:** Re: Working Draft Permit - FOP 04449/Project 35000, Starpak LLC/Starpak Houston Facility

Hi Savannah,

Thank you for your message. StarPak's RO signed the OP-CRO1. Ignacio only submitted the form because he is a StarPak employee that has a STEERS account. To my knowledge, the RO has never been required to submit forms on STEERS and I cannot find guidance stating otherwise. Please advise.

Feel free to give me a call if it's easier to discuss over the phone. 832-563-8049

Thank you,  
Kara

**Kara Z. DeRocha (she/her)**

Senior Air Quality Specialist, Program Manager, EHS Solutions Leader for Life Sciences Sector  
[kara.derocha@arcadis.com](mailto:kara.derocha@arcadis.com)

**Arcadis** | Arcadis U.S., Inc.

10205 Westheimer Road, Suite 800 | Houston, TX | 77042 | USA

T. +1 713 953 4747  
[www.arcadis.com](http://www.arcadis.com)

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---

**From:** Savannah Quiros <[Savannah.Quiros@tceq.texas.gov](mailto:Savannah.Quiros@tceq.texas.gov)>

**Sent:** Thursday, June 13, 2024 3:16 PM

**To:** DeRocha, Kara <[Kara.DeRocha@arcadis.com](mailto:Kara.DeRocha@arcadis.com)>

**Cc:** Bill Garris <[bgarris@fivestarmanagement.com](mailto:bgarris@fivestarmanagement.com)>

**Subject:** RE: Working Draft Permit - FOP 04449/Project 35000, Starpak LLC/Starpak Houston Facility

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Hi Kara,

I realized that the STEERS documents that were sent were certified by an Ignacio Aguirre, who is not an RO/DAR, which means that those documents are not certified. You can either submit an OP-CRO1 as an attachment through STEERS with the time period of 06/12/2024 to when you submit the form OR resubmit the forms through STEERS. Either way, only the RO/DARs can certify the documents.

Sincerely,

Savannah G. Quiros

(they/them/theirs)

Permit Reviewer

TCEQ – APD – OP Section (Title V)

(512) 239-1228



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---

**From:** DeRocha, Kara <[Kara.DeRocha@arcadis.com](mailto:Kara.DeRocha@arcadis.com)>

**Sent:** Wednesday, June 12, 2024 10:50 AM

**To:** Savannah Quiros <[Savannah.Quiros@tceq.texas.gov](mailto:Savannah.Quiros@tceq.texas.gov)>

**Cc:** Bill Garris <[bgarris@fivestarmanagement.com](mailto:bgarris@fivestarmanagement.com)>

**Subject:** Re: Working Draft Permit - FOP 04449/Project 35000, Starpak LLC/Starpak Houston Facility

Quite alright! Thank you for confirming reception.

Regards,

**Kara Z. DeRocha (she/her)**

Senior Air Quality Specialist, Program Manager, EHS Solutions Leader for Life Sciences Sector  
[kara.derocha@arcadis.com](mailto:kara.derocha@arcadis.com)

**Arcadis** | Arcadis U.S., Inc.

10205 Westheimer Road, Suite 800 | Houston, TX | 77042 | USA

T. +1 713 953 4747

[www.arcadis.com](http://www.arcadis.com)

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---

**From:** Savannah Quiros <[Savannah.Quiros@tceq.texas.gov](mailto:Savannah.Quiros@tceq.texas.gov)>

**Sent:** Wednesday, June 12, 2024 10:46 AM

**To:** DeRocha, Kara <[Kara.DeRocha@arcadis.com](mailto:Kara.DeRocha@arcadis.com)>

**Cc:** Bill Garris <[bgarris@fivestarmanagement.com](mailto:bgarris@fivestarmanagement.com)>

**Subject:** RE: Working Draft Permit - FOP 04449/Project 35000, Starpak LLC/Starpak Houston Facility

You don't often get email from [savannah.quiros@tceq.texas.gov](mailto:savannah.quiros@tceq.texas.gov). [Learn why this is important](#)

**Arcadis Warning:** Exercise caution with email messages from external sources such as this message. Always verify the sender and avoid clicking on links or scanning QR codes unless certain of their authenticity.

Hi Kara,

I'm sorry for missing your calls yesterday, I was out of the office. I've received the necessary documents through STEERS and everything looks good, thank you! I'll put those updates in.

Sincerely,

Savannah G. Quiros

Permit Reviewer

TCEQ – APD – OP Section (Title V)

(512) 239-1228



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---

**From:** DeRocha, Kara <[Kara.DeRocha@arcadis.com](mailto:Kara.DeRocha@arcadis.com)>

**Sent:** Wednesday, June 12, 2024 10:21 AM

**To:** Savannah Quiros <[Savannah.Quiros@tceq.texas.gov](mailto:Savannah.Quiros@tceq.texas.gov)>; Bill Garris <[bgarris@fivestarmanagement.com](mailto:bgarris@fivestarmanagement.com)>

**Cc:** Sotelo, Catherine <[Catherine.Sotelo@arcadis.com](mailto:Catherine.Sotelo@arcadis.com)>; [elizabeth.moorehead@tceq.texas.gov](mailto:elizabeth.moorehead@tceq.texas.gov)  
**Subject:** Re: Working Draft Permit - FOP 04449/Project 35000, Starpak LLC/Starpak Houston Facility

Hi Ms. Quiros,

I hope this note finds you well. I wanted to bring you up to date on the forms that you requested for StarPak's Title V permit application.

Effective May 31, 2024, StarPak has a new Responsible Official. I spoke with your Team Leader Elizabeth Moorehead on June 11 regarding this new development. In my conversation with Ms. Moorehead, she advised that we submit the OP-CRO2, OP-CRO1, and OP-PBRSUP via STEERS as this would streamline the change of RO in the TCEQ system.

Mr. Garris will be submitting signed/official versions of these forms today via STEERS. I have also attached the unsigned forms to this email for your reference.

Please let us know if you have any questions.

Regards,

**Kara Z. DeRocha (she/her)**

Senior Air Quality Specialist, Program Manager, EHS Solutions Leader for Life Sciences Sector  
[kara.derocha@arcadis.com](mailto:kara.derocha@arcadis.com)

**Arcadis** | Arcadis U.S., Inc.

10205 Westheimer Road, Suite 800 | Houston, TX | 77042 | USA

T. +1 713 953 4747

[www.arcadis.com](http://www.arcadis.com)



**Permit By Rule Supplemental Table (Page 1)**  
**Table A: Registered Permits by Rule (30 TAC Chapter 106) for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
06/12/2024	O-4449	RN102886819

Unit ID No.	Registration No.	PBR No.	Registration Date
N/A			

**Permit By Rule Supplemental Table (Page 2)**  
**Table B: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
06/12/2024	O-4449	RN102886819

Unit ID No.	PBR No.	Version No./Date
B-1	106.183	09/04/2000
DIESEL1	106.472	09/04/2000
DIESEL2	106.472	09/04/2000
EFP-1	106.511	09/04/2000
GEN-1	106.511	09/04/2000
UNLOADER2	106.473	09/04/2000
WFP-1	106.511	09/04/2000

**Permit By Rule Supplemental Table (Page 3)**  
**Table C: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for Insignificant Sources for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
06/11/2024	O-4449	RN102886819

PBR No.	Version No./Date
N/A	

**Permit By Rule Supplemental Table (Page 4)**  
**Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
06/12/2024	O-4449	RN102886819

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B-1	106.183	09/04/2000	Maintain records showing that natural gas fired in boiler is sweet natural gas.
DIESEL1	106.472	09/04/2000	Maintain records of materials stored for each piece of equipment claiming this PBR at the site.
DIESEL2	106.472	09/04/2000	Maintain records of materials stored for each piece of equipment claiming this PBR at the site.
EFP-1	106.511	09/04/2000	Maintain records demonstrating the maximum annual operating hours of the equipment claiming this PBR. Annual operating hours shall not exceed 10% of the normal annual operating schedule of the primary equipment.
GEN-1	106.511	09/04/2000	Maintain records demonstrating the maximum annual operating hours of the equipment claiming this PBR. Annual operating hours shall not exceed 10% of the normal annual operating schedule of the primary equipment.
UNLOADER2	106.473	09/04/2000	Maintain records demonstrating the loading rate of the facilities does not exceed 20,000 gallons per day averaged over any consecutive 30-day period. Maintain records of materials loaded, unloaded, or stored for each piece of equipment claiming this PBR at this site.
WFP-1	106.511	09/04/2000	Maintain records demonstrating the maximum annual operating hours of the equipment claiming this PBR. Annual operating hours shall not exceed 10% of the normal annual operating schedule of the primary equipment.

**Form OP-CRO2**  
**Change of Responsible Official Information**  
**Federal Operating Permit Program**

The Texas Commission on Environmental Quality (TCEQ) shall be notified of a new appointment or administrative information change (e.g., address, phone number, title) for a Responsible Official (RO), Designated Representative (DR), or Alternate Designated Representative (ADR) in the next submittal. **Send this completed form to the TCEQ Central Office to the attention of the Air Permits Division.** This form satisfies the requirements for notification (a revised Certificate of Representation must also be submitted to the U.S. Environmental Protection agency for changes in the DR and ADR). *After the initial submittal, if there is a change of Duly Authorized Representative (DAR) appointment or administrative information changes for the DAR, include a revised Form OP-DEL (Delegation of Responsible Official) with the next submittal to the TCEQ.*

<b>I. Identifying Information</b>		
Account No.: HGA026Z	RN: 102886819	CN: 605931682
Permit No.: O4449	Area Name: StarPak	
Company Name: StarPak LLC		
<b>II. Change Type</b>		
Action Type:	<input checked="" type="checkbox"/> New Appointment	<input type="checkbox"/> Administrative Information Change
Contact Type ( <i>only one response can be accepted per form</i> ):		
<input checked="" type="checkbox"/> Responsible Official	<input type="checkbox"/> Designated Representative	<input type="checkbox"/> Alternate Designated Representative
<b>III. Responsible Official/Designated Representative/Alternate Designated Representative Information</b>		
Conventional Title: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)		
Name: Alex Huis in 't Veld		
Title: Chief Executive Officer	Appointment Effective Date: 05/31/2024	
Telephone No.: 713-329-9183	Fax No.: 713-460-1482	
Company Name: StarPak LLC		
Mailing Address: 9690 W Wingfoot Rd		
City: Houston	State: TX	ZIP Code: 77041
E-mail Address: aha@fivestarmanagement.com		
<b>IV. Certification of Truth, Accuracy, and Completeness</b>		
<b>This certification does not extend to information, which is designated by the TCEQ as information for reference only.</b>		
I, <u>Alex Huis in 't Veld</u> , certify that, based on information (Name printed or typed)		
and belief formed after Reasonable inquiry, the statements and information stated above are true, accurate, and complete.		
Signature: _____		Signature Date: _____

**Form OP-CRO1**  
**Certification by Responsible Official**  
**Federal Operating Permit Program**

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

<b>I. Identifying Information</b>					
RN: 102886819		CN: 605931682		Account No.: HGA026Z	
Permit No.: O4449			Project No.:		
Area Name: StarPak			Company Name: StarPak LLC		
<b>II. Certification Type</b> <i>(Please mark the appropriate box)</i>					
<input checked="" type="checkbox"/> Responsible Official			<input type="checkbox"/> Duly Authorized Representative		
<b>III. Submittal Type</b> <i>(Please mark the appropriate box) (Only one response can be accepted per form)</i>					
<input type="checkbox"/> SOP/TOP Initial Permit Application		<input checked="" type="checkbox"/> Update to Permit Application			
<input type="checkbox"/> GOP Initial Permit Application		<input type="checkbox"/> Permit Revision, Renewal, or Reopening			
<input type="checkbox"/> Other: _____					
<b>IV. Certification of Truth</b>					
<b>This certification does not extend to information which is designated by the TCEQ as information for reference only.</b>					
I, <u>Alex Huis in 't Veld</u> _____ certify that I am the <u>RO</u> _____ <div style="text-align: center;"><i>(Certifier Name printed or typed)</i> <span style="margin-left: 200px;"><i>(RO or DAR)</i></span></div>					
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:					
<i>Note: Enter Either a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>					
Time Period: From <u>04-07-2023</u> _____ to <u>06-12-2024</u> _____ <div style="text-align: center;"><i>Start Date</i> <span style="margin-left: 150px;"><i>End Date</i></span></div>					
Specific Dates: _____ <div style="text-align: center;"><i>Date 1</i> <span style="margin-left: 50px;"><i>Date 2</i></span> <span style="margin-left: 50px;"><i>Date 3</i></span> <span style="margin-left: 50px;"><i>Date 4</i></span> <span style="margin-left: 50px;"><i>Date 5</i></span> <span style="margin-left: 50px;"><i>Date 6</i></span></div>					
Signature: _____ Signature Date: <u>06-12-2024</u> _____					
Title: <u>Chief Executive Officer</u> _____					

**From:** Savannah Quiros  
**Sent:** Wednesday, June 5, 2024 3:36 PM  
**To:** Bill Garris  
**Cc:** Kara DeRocha \*\* (kara.derocha@arcadis.com)  
**Subject:** RE: Working Draft Permit - FOP O4449/Project 35000, Starpak LLC/Starpak Houston Facility

Bill and Kara,

Please send the following updates through STEERS by 06/12/2024:

- **Form OP-PBRSUP:** Unit ID UNLOADER2 is missing from OP-PBRSUP tables B and D. Please submit all four tables of OP-PBRSUP as a set, with the same date.
- **Final Form OP-CRO1:** please use the date range of 04/07/2023 to when the information is submitted. Please send the final form OP-CRO1 as an attachment to your STEERS submittal.

Please note that the STEERS submittal must be certified/"signed" by the RO, or it will not be valid.

Sincerely,

Savannah G. Quiros  
Permit Reviewer  
TCEQ – APD – OP Section (Title V)  
(512) 239-1228



How are we doing? Fill out our online customer satisfaction survey at [www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

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**From:** Bill Garris <[bgarris@fivestarmanagement.com](mailto:bgarris@fivestarmanagement.com)>  
**Sent:** Friday, March 29, 2024 4:10 PM  
**To:** Savannah Quiros <[Savannah.Quiros@tceq.texas.gov](mailto:Savannah.Quiros@tceq.texas.gov)>  
**Cc:** Kara DeRocha \*\* ([kara.derocha@arcadis.com](mailto:kara.derocha@arcadis.com)) <[kara.derocha@arcadis.com](mailto:kara.derocha@arcadis.com)>  
**Subject:** FW: Working Draft Permit - FOP O4449/Project 35000, Starpak LLC/Starpak Houston Facility

Savannah,

WDPv4-O4449 Starpak LLC, attached, is approved.

Regards,

William Garris  
Five Star  
(336) 462-7064 (M)  
(832) 782-5613 (O)



**From:** Bill Garri <bgarris@fivestarmanagement.com>  
**Sent:** Friday, March 29, 2024 4:10 PM  
**To:** Savannah Quiros  
**Cc:** Kara DeRocha \*\* (kara.derocha@arcadis.com)  
**Subject:** FW: Working Draft Permit - FOP O4449/Project 35000, Starpak LLC/Starpak Houston Facility  
**Attachments:** WDPv4 - O4449 Starpak LLC (Initial, 35000).docx

Savannah,

WDPv4-O4449 Starpak LLC, attached, is approved.

Regards,

William Garri  
Five Star  
(336) 462-7064 (M)  
(832) 782-5613 (O)

---

**From:** Savannah Quiros <Savannah.Quiros@tceq.texas.gov>  
**Sent:** Thursday, March 28, 2024 2:44 PM  
**To:** Bill Garri <bgarris@fivestarmanagement.com>  
**Subject:** RE: Working Draft Permit - FOP O4449/Project 35000, Starpak LLC/Starpak Houston Facility

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Bill and Kara,

Attached is the 4<sup>th</sup> WDP. Please send your comments or **explicit approval** by **04/02/2024**

Sincerely,

*Savannah G. Quiros*

Permit Reviewer  
OA/Air Permits Division/OP Section  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[savannah.quiros@tceq.texas.gov](mailto:savannah.quiros@tceq.texas.gov)

Phone: (512) 239-1228  
Fax: (512) 239-1400

**From:** Bill Garris <bgarris@fivestarmanagement.com>  
**Sent:** Thursday, March 28, 2024 2:22 PM  
**To:** Savannah Quiros  
**Cc:** Kara DeRocha \*\* (kara.derocha@arcadis.com)  
**Subject:** RE: Working Draft Permit - FOP O4449/Project 35000, Starpak LLC/Starpak Houston Facility  
**Attachments:** WDPv3 - O4449 Starpak LLC (Initial 35000)\_03282024.docx

Attached please find 3<sup>rd</sup> WDP with two comments. Page 27 has missing information that was there on the last review and page 36 has a missed update. Thank you for working with us so well on this project.

Regards,

William Garris  
Five Star  
(336) 462-7064 (M)  
(832) 782-5613 (O)

---

**From:** Savannah Quiros <Savannah.Quiros@tceq.texas.gov>  
**Sent:** Tuesday, March 26, 2024 3:12 PM  
**To:** Bill Garris <bgarris@fivestarmanagement.com>  
**Subject:** RE: Working Draft Permit - FOP O4449/Project 35000, Starpak LLC/Starpak Houston Facility

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Hi Bill,

Attached is the 3rd WDP. Please send your comments or your **explicit approval** of the WDP by **04/02/2024**.

Sincerely,

*Savannah G. Quiros*

Permit Reviewer  
OA/Air Permits Division/OP Section  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[savannah.quiros@tceq.texas.gov](mailto:savannah.quiros@tceq.texas.gov)

Phone: (512) 239-1228  
Fax: (512) 239-1400

### Permit Shield

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit / Group / Process ID No.	Group / Inclusive Units	Regulation	Basis of Determination
	PRNTDRYR6, PRNTDRYR7, PRNTDRYR8, PRNTDRYR9		
GRP-DRYR	PRNTDRYR1, PRNTDRYR10, PRNTDRYR11, PRNTDRYR12, PRNTDRYR13, PRNTDRYR14, PRNTDRYR15, PRNTDRYR2, PRNTDRYR3, PRNTDRYR5, PRNTDRYR6, PRNTDRYR7, PRNTDRYR8, PRNTDRYR9	40 CFR Part 60, Subpart PP	Facility is not an ammonium sulfate dryer within the ammonium sulfate industry.
GRP-DRYR	PRNTDRYR1, PRNTDRYR10, PRNTDRYR11, PRNTDRYR12, PRNTDRYR13, PRNTDRYR14, PRNTDRYR15, PRNTDRYR2, PRNTDRYR3, PRNTDRYR5, PRNTDRYR6, PRNTDRYR7, PRNTDRYR8, PRNTDRYR9	40 CFR Part 61, Subpart E	Units
GRP-DRYR	PRNTDRYR1, PRNTDRYR10, PRNTDRYR11, PRNTDRYR12, PRNTDRYR13, PRNTDRYR14, PRNTDRYR15, PRNTDRYR2, PRNTDRYR3, PRNTDRYR5, PRNTDRYR6, PRNTDRYR7, PRNTDRYR8, PRNTDRYR9	40 CFR Part 61, Subpart K	Facility is not a calciner or nodulizing kiln at an elemental phosphorous plant.
GRP-DRYR	PRNTDRYR1, PRNTDRYR10, PRNTDRYR11, PRNTDRYR12, PRNTDRYR13, PRNTDRYR14, PRNTDRYR15, PRNTDRYR2, PRNTDRYR3, PRNTDRYR5, PRNTDRYR6, PRNTDRYR7, PRNTDRYR8, PRNTDRYR9	40 CFR Part 63, Subpart DDDDD	Units are not boiler or process heaters as defined in § 63.7485 at a major source of HAPs.

**Commented [DK1]:** This basis of determination is incomplete. Should say "Units do not process mercury ore, use mercury chlor-alkali cells to produce chlorine gas and/or alkali metal hydroxide, or incinerate or dry wastewater treatment plant sludge." This statement was present in the last permit that was reviewed, not sure why it disappeared in this version.

### New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
UNLOADER1	TANK TRUCK UNLOADER (0.5- PSIA)	108176
UNLOADER2	TANK TRUCK UNLOADER (0.5+ PSIA)	106.473/09/04/2000
WFP-1	WEST FIRE PUMP EMERGENCY ENGINE	106.511/01/01/0001

\*\*This column may include Permit by Rule (PBR) numbers and version dates, PBR Registration numbers in brackets, Standard Permit Registration numbers, Minor NSR permit numbers, and Major NSR permit numbers.

**Commented [DK2]:** Date should be 9/4/2000 as in originally submitted OP-SUM (requested by StarPak in last draft review)

**From:** Bill Garris <bgarris@fivestarmanagement.com>  
**Sent:** Tuesday, March 19, 2024 9:13 AM  
**To:** Savannah Quiros; kara.derocha@arcadis.com  
**Subject:** RE: Working Draft Permit - FOP O4449/Project 35000, Starpak LLC/Starpak Houston Facility  
**Attachments:** WDPv2 - O4449 Starpak LLC (Initial 35000)\_SP Comments-031924.docx

Savannah,

Attached please find the latest WDP with our comments. Please call with any questions.

Regards,

William Garris  
Five Star  
9690 W.Wingfoot Road  
Houston, Tx 77041

832 782-5613 (O)  
336 462-7064 (M)

**From:** Savannah Quiros <Savannah.Quiros@tceq.texas.gov>  
**Sent:** Wednesday, March 6, 2024 1:40 PM  
**To:** Bill Garris <bgarris@fivestarmanagement.com>; kara.derocha@arcadis.com  
**Subject:** RE: Working Draft Permit - FOP O4449/Project 35000, Starpak LLC/Starpak Houston Facility

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Hi Bill and Kara,

Attached is the updated WDP. Please send your comments or your **explicit approval** of the WDP by **03/20/2024**.

Sincerely,

*Savannah G. Quiros*

Permit Reviewer  
OA/Air Permits Division/OP Section  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[savannah.quiros@tceq.texas.gov](mailto:savannah.quiros@tceq.texas.gov)

Phone: (512) 239-1228  
Fax: (512) 239-1400

### Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
EFP-1	EU	60IIII-01	NMHC and NO <sub>x</sub>	40 CFR Part 60, Subpart IIII	§ 60.4205(c)-Table 4 § 60.4206 § 60.4207(b) [G]§ 60.4211(a) § 60.4211(c) [G]§ 60.4211(f) § 60.4218	Owners and operators of emergency stationary fire pump CI ICE with a maximum engine power greater than or equal to 130 KW and less than or equal to 560 KW and a displacement of less than 30 liters per cylinder and is a 2009 model year and later must comply with an NMHC+NO <sub>x</sub> emission limit of 4.0 g/KW-hr, as listed in Table 4 to this subpart.	None	None	[G]§ 60.4214(d)
EFP-1	EU	60IIII-01	PM	40 CFR Part 60, Subpart IIII	§ 60.4205(c)-Table 4 § 60.4206 § 60.4207(b) [G]§ 60.4211(a) § 60.4211(c) [G]§ 60.4211(f) § 60.4218	Owners and operators of emergency stationary fire pump CI ICE with a maximum engine power greater than or equal to 130 KW and less than or equal to 560 KW and a displacement of less than 30 liters per cylinder and is a 2009 model year and later must comply with a PM emission limit of 0.20 g/KW- hr, as listed in Table 4 to this subpart.	None	None	[G]§ 60.4214(d)
EFP-1	EU	63ZZZZ- 01	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6590(c)	Stationary RICE subject to Regulations under 40 CFR Part 60. An affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for	None	None	None

**Commented [KD1]:** Applicable requirements for GEN-1 and WFP-1 for MACT ZZZZ are missing. OP-UA2 submitted in December 2023

### New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
B-1	AIR HANDLER FREEZE PROTECTION BOILER	106.183/01/01/0001
DIESEL1	DIESEL STORAGE TANK FOR EFP-1	106.472/01/01/0001
DIESEL2	DIESEL STORAGE TANK FOR WFP-1	106.472/01/01/0001
EFP-1	EAST FIRE WATER PUMP EMERGENCY GENERATOR	106.511/09/04/2000
GEN-1	NATURAL GAS EMERGENCY GENERATOR	106.511/01/01/0001
INK-ROOM	INK ROOM	108176
OX-1	60,000 SCFM OXIDIZER	108176
OX-2	30,000 SCFM OXIDIZER	108176
OX-3	55,000 SCFM OXIDIZER	108176
PRNTDRYER14	PRINT DRYER 14	108176
PRNTDRYR1	PRINT DRYER 1	108176
PRNTDRYR10	PRINT DRYER 10	108176
PRNTDRYR11	PRINT DRYER 11	108176
PRNTDRYR12	PRINT DRYER 12	108176
PRNTDRYR13	PRINT DRYER 13	108176
PRNTDRYR15	PRINT DRYER 15	108176
PRNTDRYR2	PRINT DRYER 2	108176
PRNTDRYR3	PRINT DRYER 3	108176
PRNTDRYR5	PRINT DRYER 5	108176
PRNTDRYR6	PRINT DRYER 6	108176
PRNTDRYR7	PRINT DRYER 7	108176

**Commented [KD2]:** Date should be 9/4/2000 as in originally submitted OP-SUM

**Commented [KD3]:** Date should be 9/4/2000 as in originally submitted OP-SUM

**Commented [KD4]:** Date should be 9/4/2000 as in originally submitted OP-SUM

**Commented [KD5]:** Can we change this Description from "Generator" to "Engine"?

**Commented [KD6]:** Date should be 9/4/2000 as in originally submitted OP-SUM

**Commented [DK7]:** Typo - should be PRNTDRYR14 per originally submitted OP-SUM



### New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
UNLOADER1	TANK TRUCK UNLOADER (0.5- PSIA)	108176
UNLOADER2	TANK TRUCK UNLOADER (0.5+ PSIA)	106.473/09/04/2000
WFP-1	WEST FIRE PUMP EMERGENCY GENERATOR	106.511/01/01/0001

\*\*This column may include Permit by Rule (PBR) numbers and version dates, PBR Registration numbers in brackets, Standard Permit Registration numbers, Minor NSR permit numbers, and Major NSR permit numbers.

**Commented [KD8]:** Date should be 9/4/2000 as in originally submitted OP-SUM. Can we change this Description from "Generator" to "Engine"?

**From:** Bill Garri <bgarris@fivestarmangement.com>  
**Sent:** Monday, February 26, 2024 10:07 AM  
**To:** Savannah Quiros  
**Cc:** kara.derocha@arcadis.com  
**Subject:** RE: Working Draft Permit - FOP O4449/Project 35000, Starpak LLC/Starpak Houston Facility  
**Attachments:** OP-UA22 printing\_02262024.docx

Savannah,

Attached please find the updated UP-UA22 form. Please advise if you need additional information.

Regards,

William Garri  
Five Star  
(336) 462-7064 (M)  
(832) 782-5613 (O)

---

**From:** Savannah Quiros <Savannah.Quiros@tceq.texas.gov>  
**Sent:** Friday, February 23, 2024 3:46 PM  
**To:** Bill Garri <bgarris@fivestarmangement.com>  
**Cc:** kara.derocha@arcadis.com  
**Subject:** RE: Working Draft Permit - FOP O4449/Project 35000, Starpak LLC/Starpak Houston Facility

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Hi Bill,

There is another issue with the OP-UA22.

Based on the Flowchart, Control Method "VAPCON90" is not an option for facilities with Process Type "FLEXI13+" in the HGB area.

The paths for FLEXI13+ and FLEXI13- diverge with the top question on Page 2 of 11. Down the FLEXI13+ path, if you aren't using the other control methods it leads you to an info box with "The flexible package printing line operation must have a vapor control system that achieves an overall control efficiency of at 80% by weight" (VAPCON80, Main Standard §115.432(c)(1)(C)). VAPCON90 correlates to Main Standard §115.432(a)(1)(C), and as stated in §115.432(a) that subsection doesn't apply in lieu of subsection (c) beginning March 1, 2013 (FLEXI13+).

VAPCON80 would be the code that applies to you best. If you agree with this, please send me an **updated form UA-22** with VAPCON80 as the control method.

Sincerely,

**Texas Commission on Environmental Quality**  
**Printing Attributes**  
**Form OP-UA22 (Page 5)**  
**Federal Operating Permit Program**

**Table 3: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)**  
**Subchapter E: Graphic Arts (Printing) by Rotogravure and Flexographic Processes**

<b>Date:</b> 02/26/2024	<b>Permit No.:</b>	<b>Regulated Entity No.:</b> RN102886819
<b>Area Name:</b> StarPak		<b>Customer Reference No.:</b> CN604058461

<b>Process ID No.</b>	<b>SOP Index No.</b>	<b>Alternate Control Requirement (ACR)</b>	<b>ACR ID No.</b>	<b>Process Type</b>	<b>Potential Uncontrolled VOC Emissions</b>	<b>Control Method</b>	<b>Control Device</b>	<b>Control Device ID No.</b>	<b>Permanent Total Enclosure</b>
GRP-PRNT	R5432-01	NO		<del>FLEXO</del> <i>FLEXII3+</i>	25+	<del>VAPCON90</del> <i>VAPCON80</i>	CAPINC	OX-1	YES
GRP-PRNT	R5432-02	NO		<del>FLEXO</del> <i>FLEXII3+</i>	25+	<del>VAPCON90</del> <i>VAPCON80</i>	CAPINC	OX-2	YES
GRP-PRNT	R5432-03	NO		<del>FLEXO</del> <i>FLEXII3+</i>	25+	<del>VAPCON90</del> <i>VAPCON80</i>	CAPINC	OX-3	YES



**From:** Bill Garriis <bgarris@fivestarmanagement.com>  
**Sent:** Wednesday, February 21, 2024 1:09 PM  
**To:** Savannah Quiros  
**Cc:** kara.derocha@arcadis.com  
**Subject:** RE: Working Draft Permit - FOP O4449/Project 35000, Starpak LLC/Starpak Houston Facility  
**Attachments:** OP-SUM\_02212024.xlsx

Savannah,

My apologies, Savannah. Please see attached OP-SUM.

Regards,

William Garriis  
Five Star  
9690 W.Wingfoot Road  
Houston, Tx 77041

832 782-5613 (O)  
336 462-7064 (M)

**From:** Savannah Quiros <Savannah.Quiros@tceq.texas.gov>  
**Sent:** Wednesday, February 21, 2024 9:51 AM  
**To:** Bill Garriis <bgarris@fivestarmanagement.com>  
**Cc:** kara.derocha@arcadis.com  
**Subject:** RE: Working Draft Permit - FOP O4449/Project 35000, Starpak LLC/Starpak Houston Facility

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hi Bill and Kara,

I still need an updated OP-SUM with a valid preconstruction authorization number for unit UNLOADER1. In the WDP responses I see that Kara commented that UNLOADER1 is authorized under NSR 108176 (valid). However, it is written as authorized under NSR 52466 (invalid) in the current OP-SUM.

Sincerely,

*Savannah G. Quiros*  
Permit Reviewer  
OA/Air Permits Division/OP Section  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087

Texas Commission on Environmental Quality  
Federal Operating Permit Program  
Individual Unit Summary  
Form OP-SUM  
Table 1

Date	Permit No.	Regulated Entity No.
2/21/2024	TBA	RN102886819

Unit/Process ID No.	Applicable Form	Unit Name/ Description	CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title 1	Group ID No.
UNLOADER1	OP-UA4	Tank Truck Unloader (0.5- psia)		52466 108176		

TCEQ 10007 (APDG 5837v9, Revised 05/20) OP-SUM

This form is for use by facilities subject to air quality permit requirements and may be revised periodically.

**From:** Bill Garriis <bgarris@fivestarmanagement.com>  
**Sent:** Monday, February 19, 2024 9:50 AM  
**To:** Savannah Quiros  
**Cc:** kara.derocha@arcadis.com  
**Subject:** RE: Working Draft Permit - FOP O4449/Project 35000, Starpak LLC/Starpak Houston Facility  
**Attachments:** OP-MON\_02152024.docx; OP-UA22 printing\_02152024.docx; WDP - O4449 Starpak LLC (Initial 35000)\_SP Comments - Response\_SQ\_KZD.docx

Savannah,

Attached please find the requested forms and responses to the WDP. Please give me a call with any additional requests.

Regards,

William Garriis  
Five Star  
(336) 462-7064 (M)  
(832) 782-5613 (O)

---

**From:** Savannah Quiros <Savannah.Quiros@tceq.texas.gov>  
**Sent:** Wednesday, February 14, 2024 4:45 PM  
**To:** Bill Garriis <bgarris@fivestarmanagement.com>  
**Cc:** kara.derocha@arcadis.com  
**Subject:** RE: Working Draft Permit - FOP O4449/Project 35000, Starpak LLC/Starpak Houston Facility

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hi Bill,

Thank you for your continued patience; attached are my responses to your WDP comments. I rejected a few requested changes, you will see the notes.

Below I have simplified instructions as to what forms I need.

- Please send an **updated OP-SUM** with a valid preconstruction authorization for unit UNLOADER1. NSR permit number 52466 is not valid.
- Send an **updated OP-UA22 page 5** with the correct Process Type code – FLEXI13+
- Send an **updated OP-MON** with the requested language changes.

Please send me the requested forms by **02/21/2024**.

Also, as an FYI, TCEQ usually does not request a form OP-CRO1 until all updates have been received, and no more are needed. You are more than welcome to submit multiple OP-CRO1's, I'm just telling you in case it's a hassle to fill out multiple.

Sincerely,



- C. The permit holder may elect to collect monitoring data on a more frequent basis and average the data, consistent with the averaging time or minimum frequency specified in the "CAM Summary," for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis. In no event shall data be collected and used in particular instances in order to avoid reporting deviations. All monitoring data shall be collected in accordance with the requirements specified in 40 CFR § 64.7(c).
- D. The permit holder shall operate the monitoring, identified in the attached "CAM Summary," in accordance with the provisions of 40 CFR § 64.7.
- E. The permit holder shall comply with either of the following requirements for any capture system associated with the VOC control device subject to CAM. If the results of the following inspections indicate that the capture system is not working properly, the permit holder shall promptly take necessary corrective actions:
  - (i) Once a year the permit holder shall inspect the capture system in compliance of CAM for leaks in accordance with 40 CFR Part 60, Appendix A, Test Method 21, or any EPA approved alternative, including 40 CFR 51, Appendix M, Test Method 204. Leaks shall be indicated by an instrument reading greater than or equal to 500 ppm above background or as defined by the underlying applicable requirement; or
  - (ii) Once a month, the permit holder shall conduct a visual, audible, and/or olfactory inspection of the capture system in compliance of CAM to detect leaking components.
- F. The permit holder shall comply with the requirements of 40 CFR § 70.6(a)(3)(ii)(A) and 30 TAC § 122.144(1)(A)-(F) for documentation of all required inspections.

#### New Source Review Authorization Requirements

- 13. 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 PBRs and permits by rule identified in the PBR Supplemental Tables dated MON DAY, YYYY in the application for project XXXXX'), 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. These requirements:
  - A. Are incorporated by reference into this permit as applicable requirements
  - B. Shall be located with this operating permit
  - C. Are not eligible for a permit shield
- 14. The permit holder shall comply with the general requirements of 30 TAC Chapter 106, Subchapter A or the general requirements, if any, in effect at the time of the claim of any PBR.
- 15. The permit holder shall maintain records to demonstrate compliance with any emission limitation or standard that is specified in a permit by rule (PBR) or Standard Permit listed in the New Source Review Authorizations attachment. The records shall yield reliable data from the relevant time period that are representative of the emission unit's compliance with the PBR or Standard Permit.

**Commented [KD1]:** Will need to completed once permit finalized

**Commented [SQ2R1]:** This issue will be resolved in the next WDP.

**Commented [KD3R1]:** Thank you

- (ii) Title 30 TAC Chapter 117
  - (iii) If applicable, offsets for Title 30 TAC Chapter 116
  - (iv) Temporarily exceed state NSR permit allowables
- B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:
- (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)
  - (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4
  - (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)
  - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122
  - (v) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)

**~~National Volatile Organic Compound Emission Standards for Consumer and Commercial Products~~**

19. ~~Permit holders for a site subject to the control technique guidelines of 40 CFR Part 59 shall meet the following requirements for national volatile organic compounds emission standards:~~

- A. ~~The permit holder shall comply with 40 CFR Part 59, Subpart C for Commercial Products as specified in 40 CFR §§ 59.201–59.214, Tables 1 and 2, and Appendix A to Subpart C.~~

**Permit Location**

20. The permit holder shall maintain a copy of this permit and records related to requirements listed in this permit on site.

**Permit Shield (30 TAC § 122.148)**

21. A permit shield is granted for the emission units, groups, or processes specified in the attached "Permit Shield." Compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements listed in the attachment "Permit Shield." Permit shield provisions shall not be modified by the executive director until notification is provided to the permit holder. No later than 90 days after notification of a change in a determination made by the executive director, the permit holder shall apply for the appropriate permit revision to reflect the new determination. Provisional terms are not eligible for this permit shield. Any term or condition, under a permit shield, shall not be protected by the permit shield if it is replaced by a provisional term or condition or the basis of the term and condition changes.

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**Commented [DK4]:** Please remove this STC from the permit. This site does not manufacture products for sale or distribution in the U.S., so is not subject to this rule. An updated page from OP-REQ1 that references this rule is included with this submittal

**Commented [SQ5R4]:** This issue will be resolved in the next WDP.

**Commented [KD6R4]:** Thank you

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### Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
EFP-1	SRIC ENGINES	N/A	60IIII-01	40 CFR Part 60, Subpart IIII	No changing attributes.
EFP-1	SRIC ENGINES	N/A	63ZZZZ-01	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
GRP-PRNT	PRINTING UNITS	PRNTPRSS1, PRNTPRSS10, PRNTPRSS11, PRNTPRSS12, PRNTPRSS13, PRNTPRSS14, PRNTPRSS15, PRNTPRSS2, PRNTPRSS3, PRNTPRSS5, PRNTPRSS6, PRNTPRSS7, PRNTPRSS8, PRNTPRSS9	R5432-01 R5432-02 R5432-03	30 TAC Chapter 115, Graphic Arts Processes	No changing attributes.
INK-ROOM	EMISSION POINTS/STATIONARY VENTS/PROCESS VENTS	N/A	R5121-01	30 TAC Chapter 115, Vent Gas Controls	No changing attributes.
SOL-CLNR	EMISSION POINTS/STATIONARY VENTS/PROCESS VENTS	N/A	R5121-01	30 TAC Chapter 115, Vent Gas Controls	No changing attributes.
T-1	STORAGE TANKS/VESSELS	N/A	R5112-01	30 TAC Chapter 115, Storage of VOCs	No changing attributes.
T-2	STORAGE TANKS/VESSELS	N/A	R5112-01	30 TAC Chapter 115, Storage of VOCs	No changing attributes.
T-3	STORAGE TANKS/VESSELS	N/A	R5112-01	30 TAC Chapter 115, Storage of VOCs	No changing attributes.
T-4	STORAGE TANKS/VESSELS	N/A	R5112-01	30 TAC Chapter 115, Storage of VOCs	No changing attributes.

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**Commented [KD7]:** These two SOP Index Numbers are missing. The printing presses can vent to three different thermal oxidizers (OX-1, OX-2, OX-3), thus the need for three different scenarios. These three scenarios should also be represented in the CAM section, otherwise it appears that these printing presses may only vent to OX-1.

**Commented [KD8R7]:** Confirming that this change will be made.

Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
UNLOADER2	LOADING/UNLOADING OPERATIONS	N/A	R5211-01	30 TAC Chapter 115, Loading and Unloading of VOC	No changing attributes.

Commented [KD9]: Please add UNLOADER1

Commented [SQ10R9]: UNLOADER1 has an invalid pre-construction authorization, I need an updated OP-SUM with a valid one.

Commented [KD11R9]: This unloading process is from the filling of storage tanks (T-1, T-2, and T-3) at the site. The emissions from this unloading process are captured in the storage tank emissions calculations for the NSR permit and are therefore authorized under NSR Permit 108176.

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### Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
EFP-1	EU	60IIII-01	NMHC and NO <sub>x</sub>	40 CFR Part 60, Subpart IIII	§ 60.4205(c)-Table 4, <a href="#">110</a> § 60.4206 § 60.4207(b) [G]§ 60.4211(a) § 60.4211(c) [G]§ 60.4211(f) § 60.4218	Owners and operators of emergency stationary fire pump CI ICE with a maximum engine power greater than or equal to 130 KW and less than or equal to 560 KW and a displacement of less than 30 liters per cylinder and is a 2009 model year and later must comply with an NMHC+NO <sub>x</sub> emission limit of 4.0 g/KW-hr, as listed in Table 4 to this subpart.	None	None	[G]§ 60.4214(d)
EFP-1	EU	60IIII-01	PM	40 CFR Part 60, Subpart IIII	§ 60.4205(c)-Table 4, <a href="#">28</a> § 60.4206 § 60.4207(b) [G]§ 60.4211(a) § 60.4211(c) [G]§ 60.4211(f) § 60.4218	Owners and operators of emergency stationary fire pump CI ICE with a maximum engine power greater than or equal to 130 KW and less than or equal to 560 KW and a displacement of less than 30 liters per cylinder and is a 2009 model year and later must comply with a PM emission limit of 0.20 g/KW-hr, as listed in Table 4 to this subpart.	None	None	[G]§ 60.4214(d)
EFP-1	EU	63ZZZZ-01	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6590(c)	Stationary RICE subject to Regulations under 40 CFR Part 60. An affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for	None	None	None

**Commented [KD12]:** Please add to reflect what is in OP-REQ3 and in NSPS IIII flowchart and to provide as much clarity as possible to user as to which requirements are applicable.

**Commented [SQ13R12]:** I cannot add version numbers to citations. Version numbers are not part of citations, they are used as an internal measure.

**Commented [KD14R12]:** Understood. Thank you.

**Commented [KD15]:** Please add to reflect what is in OP-REQ3 and in NSPS IIII flowchart and to provide as much clarity as possible to user as to which requirements are applicable.

**Commented [SQ16R15]:** I cannot add version numbers to citations. Version numbers are not part of citations, they are used as an internal measure.

**Commented [KD17R15]:** Understood. Thank you

### Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
						compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines as applicable. No further requirements apply for such engines under this part.			
GRP-PRNT	PRO	R5432-01	VOC	30 TAC Chapter 115, Graphic Arts Processes	<del>§ 115.432(a)(1)(C)</del> <del>§ 115.432(a)</del> <del>§ 115.432(a)(4)</del> <del>§ 115.432(a)(1)(C)(iii)</del> <del>§ 115.432(a)(3)</del>	Operate a specified control device to reduce the VOC emissions from an effective capture system by at least 90% by weight. Operations shall achieve at least the following weight % reduction.	§ 115.432(a)(3) § 115.435(a)(1) § 115.435(a)(2) § 115.435(a)(3) § 115.435(a)(4) § 115.435(a)(5) § 115.435(a)(6) § 115.435(a)(7) § 115.435(a)(8) § 115.435(a)(8)(A)(i) <del>§ 115.435(e)</del> ** See CAM Summary	<del>§ 115.436(a)(1)</del> <del>§ 115.436(a)(4)</del> <del>§ 115.436(a)(5)</del> <del>§ 115.436(a)(6)</del> <del>§ 115.436(e)(5)</del>	<del>§ 115.436(a)(6)</del>
INK-ROOM	EP	R5121-01	VOC	30 TAC Chapter 115, Vent Gas Controls	§ 115.127(a)(2)(A) [G]§ 115.122(a)(4) § 115.127(a)(2)	A vent gas stream having a combined weight of volatile organic compounds (VOC) equal to or less than 100 pounds in any continuous 24-hour period is exempt from §115.121(a)(1) of this title.	[G]§ 115.125 § 115.126(2) <u>§ 115.126(3)(B)</u>	§ 115.126 § 115.126(2) § 115.126(4) <u>§ 115.126(3)(B)</u>	None
SOL-CLNR	EP	R5121-01	VOC	30 TAC Chapter 115, Vent Gas Controls	§ 115.127(a)(2)(A) [G]§ 115.122(a)(4) § 115.127(a)(2)	A vent gas stream having a combined weight of volatile organic compounds (VOC) equal to or less than 100 pounds in any continuous 24-hour period is exempt from §115.121(a)(1) of this title.	[G]§ 115.125 § 115.126(2) <u>§ 115.126(3)(B)</u>	§ 115.126 § 115.126(2) § 115.126(4) <u>§ 115.126(3)(B)</u>	None

**Commented [KD18]:** Should have three scenarios here

**Commented [SQ19R18]:** This issue will be resolved in the next WDP.

**Commented [KD20R18]:** Thank you

**Commented [KD21]:** The vast majority of these citations are incorrect. 30 TAC 115.432(a) does not apply to flexible package printing lines beginning 03/01/2013. Please refer to OP-REQ3 in application for correct citations.

**Commented [SQ22R21]:** These citations are incorrect because an incorrect code was used on OP-UA22 page 5. The process type should be FLEX113+. It is a more specific process type code that applies to you. Please send an updated UA22 with this.

**Commented [KD23R21]:** Thank you for explaining. Please see attached OP-UA22. Incorrect information has been struck through and correct information is in bold and italics.

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**Commented [KD24]:** Add 30 TAC 115.126(3)(B) to the Monitoring/Testing and Recordkeeping requirements in the permit. It is in the OP-REQ3 in the application.

**Commented [SQ25R24]:** Based on the UA-15 responses (YES to VOC Concentration or Emission Rate...) you were given 115.126(4), an alternative to 115.126(3)(B). Citation 115.126(3)(B) does not apply to you because you meet the conditions for 115.126(4) instead.

**Commented [KD26R24]:** Agreed

**Commented [KD27]:** Add 30 TAC 115.126(3)(B) to the Monitoring/Testing and Recordkeeping requirements in the permit. It is in the OP-REQ3 in the application.

**Commented [SQ28R27]:** Based on the UA-15 responses (YES to VOC Concentration or Emission Rate...) you were ...

**Commented [KD29R27]:** Agreed

### Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
T-1	EU	R5112-01	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)	Except as provided in § 115.118, a storage tank storing VOC with a true vapor pressure less than 1.5 psia is exempt from the requirements of this division.	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(7)	None
T-2	EU	R5112-01	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)	Except as provided in § 115.118, a storage tank storing VOC with a true vapor pressure less than 1.5 psia is exempt from the requirements of this division.	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(7)	None
T-3	EU	R5112-01	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)	Except as provided in § 115.118, a storage tank storing VOC with a true vapor pressure less than 1.5 psia is exempt from the requirements of this division.	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(7)	None
T-4	EU	R5112-01	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)	Except as provided in § 115.118, a storage tank storing VOC with a true vapor pressure less than 1.5 psia is exempt from the requirements of this division.	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(7)	None
UNLOADER 2	EU	R5211-01	VOC	30 TAC Chapter 115, Loading and Unloading of VOC	§ 115.212(a)(3) § 115.212(a)(2) § 115.212(a)(3)(A) § 115.212(a)(3)(A)(i) § 115.212(a)(3)(B) [G]§ 115.212(a)(3)(C) § 115.212(a)(3)(D)	All land-based VOC transfer to or from transport vessels shall be conducted in the manner specified for leak-free operations.	§ 115.212(a)(3)(B) § 115.214(a)(1)(A) § 115.214(a)(1)(A)(i) § 115.214(a)(1)(A)(ii) § 115.214(a)(1)(A)(iii)	§ 115.216 § 115.216(3)(A) § 115.216(3)(A)(i) § 115.216(3)(A)(iii)	None

**Commented [KD30]:** Please add UNLOADER1 information to the Applicable Requirements summary

**Commented [SQ31R30]:** Please see my previous comment about UNLOADER1

**Commented [KD32R30]:** Please see comment above regarding UNLOADER1

### CAM Summary

Unit/Group/Process Information	
ID No.: GRP-PRNT	
Control Device ID No.: OX-1, <u>OX-2</u> , <u>OX-3</u>	Control Device Type: Thermal incinerator (direct flame incinerator/regenerative thermal oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Graphic Arts Processes	SOP Index No.: R5432-01, <u>R5432-02</u> , <u>R5432-03</u>
Pollutant: VOC	Main Standard: § 115.432(a)(1)(C)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: four times per hour	
Averaging Period: one hour	
Deviation Limit: It shall be a deviation if the temperature in the combustion chamber is not at least 1500 degrees <u>Fahrenheit</u> .	
<p>CAM Text: The monitoring device should be installed in the combustion chamber or immediately downstream of the combustion chamber. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following:</p> <ul style="list-style-type: none"> <li>± 0.75% of the temperature being measured expressed in degrees Celsius; or</li> <li>± 2.5 degrees Celsius.</li> </ul>	

**Commented [KD33]:** Please add "when waste gas is routed to the control device"

**Commented [SQ34R33]:** Please send me an updated OP-MON form with the requested change.

**Commented [KD35R33]:** Please see attached OP-MON. Updates are in bold and italics.



### New Source Review Authorization References

The New Source Review authorizations listed in the table below are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

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.: 108176	Issuance Date: 08/19/2022
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.183	Version No./Date: 09/04/2000
Number: 106.472	Version No./Date: 09/04/2000
Number: 106.473	Version No./Date:
Number: 106.511	Version No./Date:
Number: 106.511	Version No./Date: 09/04/2000

**Commented [KD36]:** Unregistered PBR for Boiler. This should remain as is

**Commented [KD37]:** Unregistered PBR for diesel tanks. This should remain as is

**Commented [KD38]:** This is incorrect and should be deleted

**Commented [SQ39R38]:** This will be resolved in the next WDP

**Commented [KD40R38]:** Thank you

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**Commented [KD41]:** This is a duplicate entry and should be deleted

**Commented [SQ42R41]:** This will be resolved in the next WDP.

**Commented [KD43R41]:** Thank you

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**Commented [KD44]:** Unregistered PBR for Firewater Pump. This should remain as is

### New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
EFP-1	EAST FIRE WATER PUMP EMERGENCY GENERATOR	106.511/ <del>01/01/0001</del> <u>09/04/2000</u>
INK-ROOM	INK ROOM	108176
PRNTPRSS1	PRINTING PRESS 1	108176
PRNTPRSS10	PRINTING PRESS 10	108176
PRNTPRSS11	PRINTING PRESS 11	108176
PRNTPRSS12	PRINTING PRESS 12	108176
PRNTPRSS13	PRINTING PRESS 13	108176
PRNTPRSS14	PRINTING PRESS 14	108176
PRNTPRSS15	PRINTING PRESS 15	108176
PRNTPRSS2	PRINTING PRESS 2	108176
PRNTPRSS3	PRINTING PRESS 3	108176
PRNTPRSS5	PRINTING PRESS 5	108176
PRNTPRSS6	PRINTING PRESS 6	108176
PRNTPRSS7	PRINTING PRESS 7	108176
PRNTPRSS8	PRINTING PRESS 8	108176
PRNTPRSS9	PRINTING PRESS 9	108176
SOL-CLNR	SOLVENT CLEANER	108176
T-1	10,000 GAL SOLVENT STORAGE TANK	108176
T-2	14,500 GAL SOLVENT STORAGE TANK	108176
T-3	14,500 GAL SOLVENT STORAGE TANK	108176
T-4	14,500 GAL SOLVENT STORAGE TANK	108176

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### New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
UNLOADER2	TANK TRUCK UNLOADER (0.5+ PSIA)	106.473/01/01/0001-09/04/2000

\*\*This column may include Permit by Rule (PBR) numbers and version dates, PBR Registration numbers in brackets, Standard Permit Registration numbers, Minor NSR permit numbers, and Major NSR permit numbers.

**Commented [KD45]:** Please add UNLOADER1 info

**Commented [SQ46R45]:** Please see previous UNLOADER1 comment

**Commented [KD47R45]:** Please see comment above regarding authorization for UNLOADER1

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**Texas Commission on Environmental Quality**  
**Printing Attributes**  
**Form OP-UA22 (Page 5)**  
**Federal Operating Permit Program**

**Table 3: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)**  
**Subchapter E: Graphic Arts (Printing) by Rotogravure and Flexographic Processes**

<b>Date:</b> 02/15/2024	<b>Permit No.:</b>	<b>Regulated Entity No.:</b> RN102886819
<b>Area Name:</b> StarPak		<b>Customer Reference No.:</b> CN604058461

<b>Process ID No.</b>	<b>SOP Index No.</b>	<b>Alternate Control Requirement (ACR)</b>	<b>ACR ID No.</b>	<b>Process Type</b>	<b>Potential Uncontrolled VOC Emissions</b>	<b>Control Method</b>	<b>Control Device</b>	<b>Control Device ID No.</b>	<b>Permanent Total Enclosure</b>
GRP-PRNT	R5432-01	NO		<del>FLEXO</del> <i>FLEXII3+</i>	25+	VAPCON90	CAPINC	OX-1	YES
GRP-PRNT	R5432-02	NO		<del>FLEXO</del> <i>FLEXII3+</i>	25+	VAPCON90	CAPINC	OX-2	YES
GRP-PRNT	R5432-03	NO		<del>FLEXO</del> <i>FLEXII3+</i>	25+	VAPCON90	CAPINC	OX-3	YES



**Texas Commission on Environmental Quality**  
**Monitoring Requirements**  
**Form OP-MON (Page 1)**  
**Federal Operating Permit Program**  
**Table 1a: CAM/PM Additions**

<b>I. Identifying Information</b>		
Account No.: HGA026Z	RN No.: RN102886819	CN: CN605931682
Permit No.: TBA	Project No.: TBA	
Area Name: StarPak		
Company Name: StarPak LLC		
<b>II. Unit/Emission Point/Group/Process Information</b>		
Revision No.:		
Unit/EPN/Group/Process ID No.: GRP-PRNT		
Applicable Form: OP-UA22		
<b>III. Applicable Regulatory Requirement</b>		
Name: 30 TAC Chapter 115, Graphics Arts Processes		
SOP/GOP Index No.: R5432		
Pollutant: VOC		
Main Standard: 115.432(c)(1)(C)		
<b>IV. Title V Monitoring Information</b>		
Monitoring Type: CAM		
Unit Size: LG		
CAM/PM Option No.: CAM-T1-002		
Deviation Limit: It shall be a deviation if the temperature in the combustion chamber is not at least 1500 degrees Fahrenheit <b><i>when waste gas is routed to the control device.</i></b>		
CAM/PM Option No.:		
Deviation Limit:		
<b>V. Control Device Information</b>		
Control Device ID No.: OX-1		
Control Device Type: DIRFLM		

**Texas Commission on Environmental Quality  
Monitoring Requirements  
Form OP-MON (Page 2)  
Federal Operating Permit Program**

**Table 1b: CAM/PM Control Device Additions**

<b>Emission Unit ID No.</b>	<b>Control Device ID No.</b>	<b>Control Device Type</b>
GRP-PRNT	OX-1	DIRFLM
GRP-PRNT	OX-2	DIRFLM
GRP-PRNT	OX-3	DIRFLM

**From:** Bill Garris <bgarris@fivestarmanagement.com>  
**Sent:** Monday, February 5, 2024 9:02 AM  
**To:** Savannah Quiros  
**Subject:** FW: Working Draft Permit - FOP 04449/Project 35000, Starpak LLC/Starpak Houston Facility  
**Attachments:** \_Combined Post Submittal PDF docs.pdf; 20230407-01\_OP-REQ2\_StarPak\_10052023-StarPak Comments.docx; WDP - 04449 Starpak LLC (Initial, 35000)\_SP Comments.docx

Ms. Quiros,

Can you give me a status on your review of the WDP comments Starpak submitted?

Regards,

William Garris  
Five Star  
9690 W.Wingfoot Road  
Houston, Tx 77041

832 782-5613 (O)  
336 462-7064 (M)

---

**From:** Bill Garris  
**Sent:** Monday, December 4, 2023 8:08 AM  
**To:** 'Savannah Quiros' <Savannah.Quiros@tceq.texas.gov>  
**Cc:** Kara DeRocha \*\* (kara.derocha@arcadis.com) <kara.derocha@arcadis.com>; Bill Garris <bgarris@fivestarmanagement.com>  
**Subject:** RE: Working Draft Permit - FOP 04449/Project 35000, Starpak LLC/Starpak Houston Facility

Ms. Quiros,

Thank you for this opportunity to provide feedback on the Working Draft Permit (WDP) for StarPak.

Attached please find StarPak's comments to the WDP and the OP-REQ2 form emailed to us on November 14, 2023. In addition to the WDP (File name: WDP - 04449 Starpak LLC (Initial, 35000)\_SP Comments.doc) and OP-REQ2 form (File name: 20230407-01\_OP-REQ2\_StarPak\_10052023\_SP Comments.doc), we have included the following PDF documents as part of our response (File name: WDP Response PDF docs\_As Submitted):

- Signed OP-CRO1
- OP-REQ1, page 16
- OP-UA2
- OP-REQ3

Please let us know if you have any questions or would like to schedule a call to discuss further.



- C. The permit holder may elect to collect monitoring data on a more frequent basis and average the data, consistent with the averaging time or minimum frequency specified in the "CAM Summary," for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis. In no event shall data be collected and used in particular instances in order to avoid reporting deviations. All monitoring data shall be collected in accordance with the requirements specified in 40 CFR § 64.7(c).
- D. The permit holder shall operate the monitoring, identified in the attached "CAM Summary," in accordance with the provisions of 40 CFR § 64.7.
- E. The permit holder shall comply with either of the following requirements for any capture system associated with the VOC control device subject to CAM. If the results of the following inspections indicate that the capture system is not working properly, the permit holder shall promptly take necessary corrective actions:
  - (i) Once a year the permit holder shall inspect the capture system in compliance of CAM for leaks in accordance with 40 CFR Part 60, Appendix A, Test Method 21, [or any EPA approved alternative, including 40 CFR 51, Appendix M, Test Method 204](#). Leaks shall be indicated by an instrument reading greater than or equal to 500 ppm above background or as defined by the underlying applicable requirement; or
  - (ii) Once a month, the permit holder shall conduct a visual, audible, and/or olfactory inspection of the capture system in compliance of CAM to detect leaking components.
- F. The permit holder shall comply with the requirements of 40 CFR § 70.6(a)(3)(ii)(A) and 30 TAC § 122.144(1)(A)-(F) for documentation of all required inspections.

#### New Source Review Authorization Requirements

- 13. 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 PBRs and permits by rule identified in the PBR Supplemental Tables dated [MON DAY, YYYY](#) in the application for project [XXXXX](#)), 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. These requirements:
  - A. Are incorporated by reference into this permit as applicable requirements
  - B. Shall be located with this operating permit
  - C. Are not eligible for a permit shield
- 14. The permit holder shall comply with the general requirements of 30 TAC Chapter 106, Subchapter A or the general requirements, if any, in effect at the time of the claim of any PBR.
- 15. The permit holder shall maintain records to demonstrate compliance with any emission limitation or standard that is specified in a permit by rule (PBR) or Standard Permit listed in the New Source Review Authorizations attachment. The records shall yield reliable data from the relevant time period that are representative of the emission unit's compliance with the PBR or Standard Permit.

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- (ii) Title 30 TAC Chapter 117
  - (iii) If applicable, offsets for Title 30 TAC Chapter 116
  - (iv) Temporarily exceed state NSR permit allowables
- B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:
- (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)
  - (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4
  - (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)
  - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122
  - (v) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)

**National Volatile Organic Compound Emission Standards for Consumer and Commercial Products**

19. ~~Permit holders for a site subject to the control technique guidelines of 40 CFR Part 59 shall meet the following requirements for national volatile organic compounds emission standards:~~

- A. ~~The permit holder shall comply with 40 CFR Part 59, Subpart C for Commercial Products as specified in 40 CFR §§ 59.201–59.214, Tables 1 and 2, and Appendix A to Subpart C.~~

**Permit Location**

20. The permit holder shall maintain a copy of this permit and records related to requirements listed in this permit on site.

**Permit Shield (30 TAC § 122.148)**

21. A permit shield is granted for the emission units, groups, or processes specified in the attached "Permit Shield." Compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements listed in the attachment "Permit Shield." Permit shield provisions shall not be modified by the executive director until notification is provided to the permit holder. No later than 90 days after notification of a change in a determination made by the executive director, the permit holder shall apply for the appropriate permit revision to reflect the new determination. Provisional terms are not eligible for this permit shield. Any term or condition, under a permit shield, shall not be protected by the permit shield if it is replaced by a provisional term or condition or the basis of the term and condition changes.

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**Commented [DK2]:** Please remove this STC from the permit. This site does not manufacture products for sale or distribution in the U.S., so is not subject to this rule. An updated page from OP-REQ1 that references this rule is included with this submittal

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### Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
EFP-1	SRIC ENGINES	N/A	60IIII-01	40 CFR Part 60, Subpart IIII	No changing attributes.
EFP-1	SRIC ENGINES	N/A	63ZZZZ-01	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
GRP-PRNT	PRINTING UNITS	PRNTPRSS1, PRNTPRSS10, PRNTPRSS11, PRNTPRSS12, PRNTPRSS13, PRNTPRSS14, PRNTPRSS15, PRNTPRSS2, PRNTPRSS3, PRNTPRSS5, PRNTPRSS6, PRNTPRSS7, PRNTPRSS8, PRNTPRSS9	R5432-01 R5432-02 R5432-03	30 TAC Chapter 115, Graphic Arts Processes	No changing attributes.
INK-ROOM	EMISSION POINTS/STATIONARY VENTS/PROCESS VENTS	N/A	R5121-01	30 TAC Chapter 115, Vent Gas Controls	No changing attributes.
SOL-CLNR	EMISSION POINTS/STATIONARY VENTS/PROCESS VENTS	N/A	R5121-01	30 TAC Chapter 115, Vent Gas Controls	No changing attributes.
T-1	STORAGE TANKS/VESSELS	N/A	R5112-01	30 TAC Chapter 115, Storage of VOCs	No changing attributes.
T-2	STORAGE TANKS/VESSELS	N/A	R5112-01	30 TAC Chapter 115, Storage of VOCs	No changing attributes.
T-3	STORAGE TANKS/VESSELS	N/A	R5112-01	30 TAC Chapter 115, Storage of VOCs	No changing attributes.
T-4	STORAGE TANKS/VESSELS	N/A	R5112-01	30 TAC Chapter 115, Storage of VOCs	No changing attributes.

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**Commented [KD3]:** These two SOP Index Numbers are missing. The printing presses can vent to three different thermal oxidizers (OX-1, OX-2, OX-3), thus the need for three different scenarios. These three scenarios should also be represented in the CAM section, otherwise it appears that these printing presses may only vent to OX-1.

Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
UNLOADER2	LOADING/UNLOADING OPERATIONS	N/A	R5211-01	30 TAC Chapter 115, Loading and Unloading of VOC	No changing attributes.

**Commented [KD4]:** Please add UNLOADER1

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### Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
EFP-1	EU	60IIII-01	NMHC and NO <sub>x</sub>	40 CFR Part 60, Subpart IIII	§ 60.4205(c)-Table 4, <a href="#">110</a> § 60.4206 § 60.4207(b) [G]§ 60.4211(a) § 60.4211(c) [G]§ 60.4211(f) § 60.4218	Owners and operators of emergency stationary fire pump CI ICE with a maximum engine power greater than or equal to 130 KW and less than or equal to 560 KW and a displacement of less than 30 liters per cylinder and is a 2009 model year and later must comply with an NMHC+NO <sub>x</sub> emission limit of 4.0 g/KW-hr, as listed in Table 4 to this subpart.	None	None	[G]§ 60.4214(d)
EFP-1	EU	60IIII-01	PM	40 CFR Part 60, Subpart IIII	§ 60.4205(c)-Table 4, <a href="#">28</a> § 60.4206 § 60.4207(b) [G]§ 60.4211(a) § 60.4211(c) [G]§ 60.4211(f) § 60.4218	Owners and operators of emergency stationary fire pump CI ICE with a maximum engine power greater than or equal to 130 KW and less than or equal to 560 KW and a displacement of less than 30 liters per cylinder and is a 2009 model year and later must comply with a PM emission limit of 0.20 g/KW-hr, as listed in Table 4 to this subpart.	None	None	[G]§ 60.4214(d)
EFP-1	EU	63ZZZZ-01	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6590(c)	Stationary RICE subject to Regulations under 40 CFR Part 60. An affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for	None	None	None

**Commented [KD5]:** Please add to reflect what is in OP-REQ3 and in NSPS IIII flowchart and to provide as much clarity as possible to user as to which requirements are applicable.

**Commented [KD6]:** Please add to reflect what is in OP-REQ3 and in NSPS IIII flowchart and to provide as much clarity as possible to user as to which requirements are applicable.

### Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
						compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines as applicable. No further requirements apply for such engines under this part.			
GRP-PRNT	PRO	R5432-01	VOC	30 TAC Chapter 115, Graphic Arts Processes	<del>§ 115.432(a)(1)(C)</del> <del>§ 115.432(a)</del> <del>§ 115.432(a)(4)</del> <del>§ 115.432(a)(1)(C)(iii)</del> <del>§ 115.432(a)(3)</del>	Operate a specified control device to reduce the VOC emissions from an effective capture system by at least 90% by weight. Operations shall achieve at least the following weight % reduction.	§ 115.432(a)(3) § 115.435(a)(1) § 115.435(a)(2) § 115.435(a)(3) § 115.435(a)(4) § 115.435(a)(5) § 115.435(a)(6) § 115.435(a)(7) § 115.435(a)(8) § 115.435(a)(8)(A)(i) <del>§ 115.435(e)</del> ** See CAM Summary	<del>§ 115.436(a)(1)</del> <del>§ 115.436(a)(4)</del> <del>§ 115.436(a)(5)</del> <del>§ 115.436(a)(6)</del> <del>§ 115.436(e)(5)</del>	<del>§ 115.436(a)(6)</del>
INK-ROOM	EP	R5121-01	VOC	30 TAC Chapter 115, Vent Gas Controls	§ 115.127(a)(2)(A) [G]§ 115.122(a)(4) § 115.127(a)(2)	A vent gas stream having a combined weight of volatile organic compounds (VOC) equal to or less than 100 pounds in any continuous 24-hour period is exempt from §115.121(a)(1) of this title.	[G]§ 115.125 § 115.126(2) <u>§ 115.126(3)(B)</u>	§ 115.126 § 115.126(2) § 115.126(4) <u>§ 115.126(3)(B)</u>	None
SOL-CLNR	EP	R5121-01	VOC	30 TAC Chapter 115, Vent Gas Controls	§ 115.127(a)(2)(A) [G]§ 115.122(a)(4) § 115.127(a)(2)	A vent gas stream having a combined weight of volatile organic compounds (VOC) equal to or less than 100 pounds in any continuous 24-hour period is exempt from §115.121(a)(1) of this title.	[G]§ 115.125 § 115.126(2) <u>§ 115.126(3)(B)</u>	§ 115.126 § 115.126(2) § 115.126(4) <u>§ 115.126(3)(B)</u>	None

**Commented [KD7]:** Should have three scenarios here

**Commented [KD8]:** The vast majority of these citations are incorrect. 30 TAC 115.432(a) does not apply to flexible package printing lines beginning 03/01/2013. Please refer to OP-REQ3 in application for correct citations.

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**Commented [KD9]:** Add 30 TAC 115.126(3)(B) to the Monitoring/Testing and Recordkeeping requirements in the permit. It is in the OP-REQ3 in the application.

**Commented [KD10]:** Add 30 TAC 115.126(3)(B) to the Monitoring/Testing and Recordkeeping requirements in the permit. It is in the OP-REQ3 in the application.

### Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
T-1	EU	R5112-01	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)	Except as provided in § 115.118, a storage tank storing VOC with a true vapor pressure less than 1.5 psia is exempt from the requirements of this division.	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(7)	None
T-2	EU	R5112-01	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)	Except as provided in § 115.118, a storage tank storing VOC with a true vapor pressure less than 1.5 psia is exempt from the requirements of this division.	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(7)	None
T-3	EU	R5112-01	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)	Except as provided in § 115.118, a storage tank storing VOC with a true vapor pressure less than 1.5 psia is exempt from the requirements of this division.	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(7)	None
T-4	EU	R5112-01	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)	Except as provided in § 115.118, a storage tank storing VOC with a true vapor pressure less than 1.5 psia is exempt from the requirements of this division.	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(7)	None
UNLOADER 2	EU	R5211-01	VOC	30 TAC Chapter 115, Loading and Unloading of VOC	§ 115.212(a)(3) § 115.212(a)(2) § 115.212(a)(3)(A) § 115.212(a)(3)(A)(i) § 115.212(a)(3)(B) [G]§ 115.212(a)(3)(C) § 115.212(a)(3)(D)	All land-based VOC transfer to or from transport vessels shall be conducted in the manner specified for leak-free operations.	§ 115.212(a)(3)(B) § 115.214(a)(1)(A) § 115.214(a)(1)(A)(i) § 115.214(a)(1)(A)(ii) § 115.214(a)(1)(A)(iii)	§ 115.216 § 115.216(3)(A) § 115.216(3)(A)(i) § 115.216(3)(A)(iii)	None

**Commented [KD11]:** Please add UNLOADER1 information to the Applicable Requirements summary

### CAM Summary

Unit/Group/Process Information	
ID No.: GRP-PRNT	
Control Device ID No.: OX-1, <a href="#">OX-2</a> , <a href="#">OX-3</a>	Control Device Type: Thermal incinerator (direct flame incinerator/regenerative thermal oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Graphic Arts Processes	SOP Index No.: R5432-01, <a href="#">R5432-02</a> , <a href="#">R5432-03</a>
Pollutant: VOC	Main Standard: § 115.432(a)(1)(C)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: four times per hour	
Averaging Period: one hour	
Deviation Limit: It shall be a deviation if the temperature in the combustion chamber is not at least 1500 degrees <a href="#">Fahrenheit</a> .	
<p>CAM Text: The monitoring device should be installed in the combustion chamber or immediately downstream of the combustion chamber. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following:</p> <ul style="list-style-type: none"> <li>± 0.75% of the temperature being measured expressed in degrees Celsius; or</li> <li>± 2.5 degrees Celsius.</li> </ul>	

**Commented [KD12]:** Please add "when waste gas is routed to the control device"



### New Source Review Authorization References

The New Source Review authorizations listed in the table below are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

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.: 108176	Issuance Date: 08/19/2022
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.183	Version No./Date: 09/04/2000
Number: 106.472	Version No./Date: 09/04/2000
Number: 106.473	Version No./Date:
Number: 106.511	Version No./Date:
Number: 106.511	Version No./Date: 09/04/2000

**Commented [KD13]:** Unregistered PBR for Boiler. This should remain as is

**Commented [KD14]:** Unregistered PBR for diesel tanks. This should remain as is

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**Commented [KD17]:** Unregistered PBR for Firewater Pump. This should remain as is

### New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
EFP-1	EAST FIRE WATER PUMP EMERGENCY GENERATOR	106.511/01/01/0001 <del>09/04/2000</del>
INK-ROOM	INK ROOM	108176
PRNTPRSS1	PRINTING PRESS 1	108176
PRNTPRSS10	PRINTING PRESS 10	108176
PRNTPRSS11	PRINTING PRESS 11	108176
PRNTPRSS12	PRINTING PRESS 12	108176
PRNTPRSS13	PRINTING PRESS 13	108176
PRNTPRSS14	PRINTING PRESS 14	108176
PRNTPRSS15	PRINTING PRESS 15	108176
PRNTPRSS2	PRINTING PRESS 2	108176
PRNTPRSS3	PRINTING PRESS 3	108176
PRNTPRSS5	PRINTING PRESS 5	108176
PRNTPRSS6	PRINTING PRESS 6	108176
PRNTPRSS7	PRINTING PRESS 7	108176
PRNTPRSS8	PRINTING PRESS 8	108176
PRNTPRSS9	PRINTING PRESS 9	108176
SOL-CLNR	SOLVENT CLEANER	108176
T-1	10,000 GAL SOLVENT STORAGE TANK	108176
T-2	14,500 GAL SOLVENT STORAGE TANK	108176
T-3	14,500 GAL SOLVENT STORAGE TANK	108176
T-4	14,500 GAL SOLVENT STORAGE TANK	108176

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### New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
UNLOADER2	TANK TRUCK UNLOADER (0.5+ PSIA)	106.473/01/01/0001-09/04/2000

\*\*This column may include Permit by Rule (PBR) numbers and version dates, PBR Registration numbers in brackets, Standard Permit Registration numbers, Minor NSR permit numbers, and Major NSR permit numbers.

**Commented [KD18]:** Please add UNLOADER1 info

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**Form OP-REQ2**  
**Negative Applicable Requirement Determinations**  
**Texas Commission on Environmental Quality**

Date		Permit Number			Regulated Entity No.	
4/4/2023		TBA			RN102886819	
Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded	Negative Applicability/Superseded Requirement/Reason
		B-1	OP-REQ2	30 TAC Chapter 111, Incineration	§111.121	Unit does not meet definition of an incinerator as defined in §101.1.
		B-1	OP-REQ2	30 TAC Chapter 113, Hospital/Medical/Infectious Waste Incinerators	§113.2071	Unit is not a designated facility with existing hospital/medical/infectious waste incinerator (HMIWI) units.
		B-1	OP-REQ2	40 CFR Part 60, Subpart D	§60.40(a)	Unit does not have a heat input rate of more than 73 megawatts (MW; 250 MMBtu/hr).
		B-1	OP-REQ2	40 CFR Part 60, Subpart Da	§60.40a(a)	Unit is not an electric utility steam generating unit.
		B-1	OP-REQ2	40 CFR Part 60, Subpart Db	§60.40b(a)	Unit is not a steam generating unit with a heat input capacity > 29 MW (100 MMBtu/hr).
		B-1	OP-REQ2	40 CFR Part 60, Subpart Dc	§60.40c(a)	Unit is not a steam generating unit with a heat input capacity > than 2.9 MW (10 MMBtu/hr) and < 29 MW (100MMBtu/hr).
		B-1	OP-REQ2	40 CFR Part 60, Subpart TTTT	§60.5509(a)	Unit is not a steam generating unit, integrated gasification combined cycle (IGCC) facility, or a stationary combustion turbine that commenced construction after 1/8/14; or commenced modification or reconstruction after 6/18/14.
		B-1	OP-REQ2	40 CFR Part 63, Subpart EEE	§63.1200	Unit does not meet definition of a hazardous waste incinerator as defined in 40 CFR 63.1201(a).
		B-1	OP-REQ2	40 CFR Part 63, Subpart DDDDD	§63.7485	Unit is not located at and is not part of a major source of HAPs.
		B-1	OP-REQ2	40 CFR Part 63, Subpart UUUUU	§63.9981	Unit is not a coal- or oil-fired electric utility steam generating unit as defined in § 63.10042.
		DIESEL1	OP-REQ2	30 TAC Chapter 115, Storage of VOCs	§115.111(a)(8)	Unit has a capacity less than or equal to 1,000 gal (3,785 L).
		DIESEL1	OP-REQ2	40 CFR Part 60, Subpart K	§60.110(a)	Unit does not have a capacity greater than or equal to 40,000 gal (151,412 L).

**Commented [KD1]:** Oftentimes personnel who are not familiar with Texas Title V permits, or the nuances of air regulations, will be using this permit as a guidance for compliance. Therefore, we have included several rules that may seem redundant (NSPS K-series or D-series) or may not seem to fit with the type of equipment listed (incinerator rules for boilers), but we want to ensure that anyone who is

**Commented [KD3R2]:** These rules are listed on OP-UA6 for boiler/steam generators. We are including this rule

**Commented [SQ2]:** For citations §111.121 and §113.2071: These are

**Commented [KD4]:** These rules are listed on OP-UA6 for boiler/steam generators. We are including this rule

**Commented [KD6R5]:** We would like all D-series reasons included in the Permit Shield to assist our non-air

**Commented [SQ5]:** For streamlining purposes, I have cut citations from Subparts D, Da, Db, and Dc to one

**Commented [KD8R7]:** This rule is included in the OP-UA6 and does not

**Commented [SQ7]:** If this boiler is older, I suggest removing this citation

**Commented [KD10R9]:** These rules are listed on OP-UA6 for boiler/steam generators. We are including this rule

**Commented [SQ9]:** This hazard waste incinerator rule is not necessary for this boiler.

**Commented [SQ11]:** Citations from Subparts K, Ka, and Kb can be cut down to one citation. The reasoning is

**Form OP-REQ2**  
**Negative Applicable Requirement Determinations**  
**Texas Commission on Environmental Quality**

Date		Permit Number			Regulated Entity No.	
4/4/2023		TBA			RN102886819	
Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
		DIESEL1	OP-REQ2	40 CFR Part 60, Subpart Ka	§60.110a(a)	Unit does not have a capacity greater than or equal to 40,000 gal (151,412 L).
		DIESEL1	OP-REQ2	40 CFR Part 60, Subpart Kb	§60.110b(a)	Unit does not have a capacity greater than or equal to 19,800 gal (75 cubic meters).
		DIESEL1	OP-REQ2	40 CFR Part 61, Subpart Y	§61.270(a)	Unit does not store benzene.
		DIESEL1	OP-REQ2	40 CFR Part 63, Subpart OO	§63.900	Another subpart of 40 CFR Parts 60, 61, or 63 does not reference the use of this Subpart for air emission control.
		DIESEL2	OP-REQ2	30 TAC Chapter 115, Storage of VOCs	§115.111(a)(8)	Unit has a capacity less than or equal to 1,000 gal (3,785 L).
		DIESEL2	OP-REQ2	40 CFR Part 60, Subpart Ka	§60.110(a)	Unit does not have a capacity greater than or equal to 40,000 gal (151,412 L).
		DIESEL2	OP-REQ2	40 CFR Part 60, Subpart Ka	§60.110a(a)	Unit does not have a capacity greater than or equal to 40,000 gal (151,412 L).
		DIESEL2	OP-REQ2	40 CFR Part 60, Subpart Kb	§60.110b(a)	Unit does not have a capacity greater than or equal to 19,800 gal (75 cubic meters).
		DIESEL2	OP-REQ2	40 CFR Part 61, Subpart Y	§61.270(a)	Unit does not store benzene.
		DIESEL2	OP-REQ2	40 CFR Part 63, Subpart OO	§63.900	Another subpart of 40 CFR Parts 60, 61, or 63 does not reference the use of this Subpart for air emission control.
		EFP-1	OP-UA2	30 TAC Chapter 117, East Texas Combustion	§117.3300	Unit is not located in a county subject to this requirement.
		EFP-1	OP-UA2	40 CFR Part 60, Subpart JJJ	§60.4230(a)(4)	Unit is not a stationary spark ignition internal combustion engine.
		GEN-1	OP-REQ2	30 TAC Chapter 117, East Texas Combustion	§117.3300	Unit is not located in a county subject to this requirement.
		GEN-1	OP-REQ2	40 CFR Part 60, Subpart IIII	§60.4200(a)(2)	Unit is not a stationary compression ignition internal combustion engine.
		GEN-1	OP-REQ2	40 CFR Part 60, Subpart JJJ	§60.4230(a)(4)	Unit commenced construction or modification/reconstruction before 6/12/06.

**Commented [KD12R11]:** We would like all K-series reasons included in the Permit Shield to assist our non-air experts with understanding which rules are applicable or not and why. Please add to Permit Shield.

**Commented [KD14R13]:** We would like all K-series reasons included in the Permit Shield to assist our non-air experts with understanding which rules are applicable or not and why. Please add to Permit Shield.

**Commented [SQ13]:** Citations from Subparts K, Ka, and Kb can be cut down to one citation. The reasoning is fine, but you should choose one citation based on the age in the rule. For the WDP I chose Subpart Kb but let me know if you would like this changed.

**Commented [KD16R15]:** This rule is listed as a potentially applicable rule for all engines on OP-UA2 and there is not an "out" for this rule on the OP-REQ1. This will help our non-air experts understand why the rule does not apply to this site.

**Commented [SQ15]:** I suggest removing this citation from the OP-REQ2 as it cannot be potentially applicable that the county the unit is

**Commented [KD18R17]:** This rule is listed as a potentially applicable rule for all engines on OP-UA2 and there is not an "out" for this rule on the OP-REQ1. This will help our

**Commented [SQ17]:** I suggest removing this citation from the OP-REQ2 as it cannot be confused what county the unit is located in.

**Form OP-REQ2**  
**Negative Applicable Requirement Determinations**  
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Date				Permit Number		Regulated Entity No.	
4/4/2023				TBA		RN102886819	
Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded	Negative Applicability/Superseded Requirement Reason	
		GEN-1	OP-REQ2	40 CFR Part 63, Subpart ZZZZ	§63.6585(f)	Unit meets criteria of the listed emergency stationary RICE exempt from requirement.	
		GRP-OX	OP-REQ2	30 TAC Chapter 111, Incineration	§111.121	Units are not incinerators as defined in §101.1.	
		GRP-OX	OP-REQ2	30 TAC Chapter 113, Hospital/Medical/Infectious Waste Incinerators	§113.2071	Unit is not a designated facility with existing hospital/medical/infectious waste incinerator (HMIWI) units.	
		GRP-OX	OP-REQ2	30 TAC Chapter 115, Vent Gas Control	§115.127(a)(7)	All VOCs in the vent gas stream originate from another source which is subject to a different Division within 30 TAC Chapter 115 and vent gas stream does not contain any highly reactive VOCs.	
		GRP-OX	OP-REQ2	40 CFR Part 60, Subpart E	§60.50(a)	Units are not incinerators of more than 45 metric tons per day charging rate (50 tons/day).	
		GRP-OX	OP-REQ2	40 CFR Part 60, Subpart O	§60.150(a)	Units are not incinerators burning waste containing sewage sludge.	
		GRP-OX	OP-REQ2	40 CFR Part 61, Subpart C	§61.30	Units are not extraction plants, ceramic plants, foundries, incinerators, and propellant plants which process beryllium ore, beryllium, beryllium oxide, beryllium alloys, or beryllium-containing waste; and do not process beryllium ore, metal, oxide, alloys, or beryllium-containing waste.	
		GRP-OX	OP-REQ2	40 CFR Part 61, Subpart E	§61.50	Units do not process mercury ore, use mercury chlor-alkali cells to produce chlorine gas and/or alkali metal hydroxide, or incinerate or dry wastewater treatment plant sludge.	
		GRP-OX	OP-REQ2	40 CFR Part 63, Subpart EEE	§63.1200	Units are not hazardous waste combustors.	
		GRP-DRYR	OP-REQ2	30 TAC Chapter 111, Incineration	§111.121	Units are not incinerators as defined in §101.1 used to burn waste.	

**Commented [KD20R19]:** Agreed. We have included a OP-UA2 and OP-REQ3 for this Unit ID for MACT ZZZZ as a separate attachment in our email response.

**Commented [SQ19]:** This site appears to be a manufacturing/industrial site. This rule only applies to commercial, residential, or institutional sites. I don't believe your site qualifies for this rule

**Commented [KD22R21]:** This rule is listed on OP-UA35 as potentially applicable, therefore we addressed it on OP-REQ2. Please add to Permit Shield.

**Commented [SQ21]:** Your site is a different industry from this rule. I don't believe your site qualifies for this rule

**Commented [KD24R23]:** We have included these rules and citations to take out any guess work on the part of our EHS personnel and to ensure completeness. Please include them in the Permit Shield.

**Commented [SQ23]:** To streamline these citations: if the rules are for completely different industries from your site, it is not necessary to have these shields, such as: Part 61 Subparts C and E, Part 60 Subpart O, Chapter 113 (above).

**Form OP-REQ2**  
**Negative Applicable Requirement Determinations**  
**Texas Commission on Environmental Quality**

Date		Permit Number			Regulated Entity No.	
4/4/2023		TBA			RN102886819	
Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded	Negative Applicability/Superseded Requirement Reason
		GRP-DRYR	OP-REQ2	30 TAC Chapter 112, Control of Sulfur Compounds	§112.9	Units are not liquid fuel-fired heaters or furnaces.
		GRP-DRYR	OP-REQ2	30 TAC Chapter 117, Multi-Region Combustion Control	§117.3100	Facility does not have cement kilns on site.
		GRP-DRYR	OP-REQ2	40 CFR Part 60, Subpart PP	§60.420(a)	Facility is not an ammonium sulfate dryer within the ammonium sulfate industry.
		GRP-DRYR	OP-REQ2	40 CFR Part 61, Subpart E	§61.50	Units do not process mercury ore, use mercury-chlor-alkali cells to produce chlorine gas and/or alkali metal hydroxide, or incinerate or dry wastewater treatment plant sludge.
		GRP-DRYR	OP-REQ2	40 CFR Part 61, Subpart K	§61.120	Facility is not a calciner or nodulizing kiln at an elemental phosphorous plant.
		GRP-DRYR	OP-REQ2	40 CFR Part 63, Subpart EEE	§63.1200	Units are not hazardous waste combustors.
		GRP-DRYR	OP-REQ2	40 CFR Part 63, Subpart DDDDD	§63.7485	Units are not boiler or process heaters as defined in §63.7485 at a major source of HAPs.
		GRP-DRYR	OP-REQ2	40 CFR Part 63, Subpart JJJJJ	§63.8380	Site is not a brick or structural clay products manufacturing facility.
		GRP-PRNT	OP-UA22	30 TAC Chapter 115, Offset Lithographic Printing	§115.440(a)	Offset lithographic printing press lines are not present onsite.
		GRP-PRNT	OP-UA22	40 CFR Part 60, Subpart QQ	§60.430(a)	Units are not publication rotogravure printing presses.
		GRP-PRNT	OP-UA22	40 CFR Part 60, Subpart FFF	§60.580(a)	Rotogravure printing lines are not present onsite.
		GRP-PRNT	OP-UA22	40 CFR Part 63, Subpart KK	§63.820(a)	Site is not a major source of hazardous air pollutants (HAP).
		T-1	OP-UA3	40 CFR Part 60, Subpart K	§60.110(a)	Unit does not store petroleum liquids.
		T-1	OP-UA3	40 CFR Part 60, Subpart Ka	§60.110a(a)	Unit does not store petroleum liquids.

**Commented [SQ25]:** This rule is fine, but you need to specify the fuel types: "Units are not liquid or solid fuel-fired."

**Commented [KD26R25]:** Agreed. Please change wording to "Units are not liquid or solid fuel-fired heaters or furnaces."

**Commented [KD28R27]:** TCEQ has listed this rule on OP-UA51 and not provided an "out" on OP-REQ1. We have addressed this rule to ensure clarity of applicability for all rules included in the OP-UA form. Please add to Permit Shield.

**Commented [SQ27]:** This rule is not potentially applicable, so it is not necessary.

**Commented [DK30R29]:** Per guidance from Carolyn Moorehead and Carolyn Maus, applicant may rules in both OP-UA5 and OP-UA51

**Commented [SQ29]:** These rules are for a completely different industry type, so they are not necessary.

**Commented [KD32R31]:** This rule is included on OP-UA51. Please add to Permit Shield.

**Commented [SQ31]:** This rule is not industrially related, so it is not necessary.

**Commented [KD34R33]:** This rule is included on OP-UA22, therefore we

**Commented [SQ33]:** If these units are not on-site at all, you don't need

**Commented [SQ35]:** Citations from Subparts K, Ka, and Kb can be cut down to one citation. The reasoning is

**Form OP-REQ2**  
**Negative Applicable Requirement Determinations**  
**Texas Commission on Environmental Quality**

Date		Permit Number			Regulated Entity No.	
4/4/2023		TBA			RN102886819	
Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded	Negative Applicability/Superseded Requirement Reason
		T-1	OP-UA3	40 CFR Part 60, Subpart Kb	Requirement Citation §60.110b(a)	Unit does not have a capacity greater than or equal to 19,800 gal (75 cubic meters).
		T-1	OP-UA3	40 CFR Part 61, Subpart Y	§61.270(a)	Unit does not store benzene.
		T-1	OP-UA3	40 CFR Part 63, Subpart OO	§63.900	Another subpart of 40 CFR Parts 60, 61, or 63 does not reference the use of this Subpart for air emission control.
		T-2	OP-UA3	40 CFR Part 60, Subpart K	§60.110(a)	Unit does not store petroleum liquids.
		T-2	OP-UA3	40 CFR Part 60, Subpart Ka	§60.110a(a)	Unit does not store petroleum liquids.
		T-2	OP-UA3	40 CFR Part 60, Subpart Kb	§60.110b(a)	Unit does not have a capacity greater than or equal to 19,800 gal (75 cubic meters).
		T-2	OP-UA3	40 CFR Part 61, Subpart Y	§61.270(a)	Unit does not store benzene.
		T-2	OP-UA3	40 CFR Part 63, Subpart OO	§63.900	Another subpart of 40 CFR Parts 60, 61, or 63 does not reference the use of this Subpart for air emission control.
		T-3	OP-UA3	40 CFR Part 60, Subpart K	§60.110(a)	Unit does not store petroleum liquids.
		T-3	OP-UA3	40 CFR Part 60, Subpart Ka	§60.110a(a)	Unit does not store petroleum liquids.
		T-3	OP-UA3	40 CFR Part 60, Subpart Kb	§60.110b(a)	Unit does not have a capacity greater than or equal to 19,800 gal (75 cubic meters).
		T-3	OP-UA3	40 CFR Part 61, Subpart Y	§61.270(a)	Unit does not store benzene.
		T-3	OP-UA3	40 CFR Part 63, Subpart OO	§63.900	Another subpart of 40 CFR Parts 60, 61, or 63 does not reference the use of this Subpart for air emission control.
		T-4	OP-UA3	40 CFR Part 60, Subpart K	§60.110(a)	Unit does not store petroleum liquids.
		T-4	OP-UA3	40 CFR Part 60, Subpart Ka	§60.110a(a)	Unit does not store petroleum liquids.
		T-4	OP-UA3	40 CFR Part 60, Subpart Kb	§60.110b(a)	Unit does not have a capacity greater than or equal to 19,800 gal (75 cubic meters).

**Commented [KD36R35]:** Please see comment above for Unit ID "DIESEL" on NSPS K-series. Please add to Permit Shield.

**Commented [SQ37]:** Citations from Subparts K, Ka, and Kb can be cut down to one citation. The reasoning is fine, but you should choose one citation based on the age in the rule. For the WDP I chose Subpart Kb but let me know if you would like this changed

**Commented [KD38R37]:** Please see comment above for Unit ID "DIESEL" on NSPS K-series. Please see comment above for Unit ID "DIESEL" on NSPS K-series. Please add to Permit Shield.

**Commented [SQ39]:** Citations from Subparts K, Ka, and Kb can be cut down to one citation. The reasoning is fine, but you should choose one citation based on the age in the rule. For the WDP I chose Subpart Kb but let me know if you would like this changed

**Commented [KD40R39]:** Please see comment above for Unit ID "DIESEL" on NSPS K-series. Please add to Permit Shield.

**Commented [SQ41]:** Citations from Subparts K, Ka, and Kb can be cut down to one citation. The reasoning is fine, but you should choose one citation based on the age in the rule. For the WDP I chose Subpart Kb but

**Commented [KD42R41]:** Please see comment above for Unit ID "DIESEL" on NSPS K-series. Please add to Permit Shield.



**Form OP-REQ2**  
**Negative Applicable Requirement Determinations**  
**Texas Comission on Environmental Quality**

Date				Permit Number		Regulated Entity No.
4/4/2023				TBA		RN102886819
		T-4	OP-UA3	40 CFR Part 61, Subpart Y	§61.270(a)	Unit does not store benzene.
		T-4	OP-UA3	40 CFR Part 63, Subpart OO	§63.900	Another subpart of 40 CFR Parts 60, 61, or 63 does not reference the use of this Subpart for air emission control.
Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded	Negative Applicability/Superseded Requirement Reason
		<del>WFP-1</del>	<del>OP-REQ2</del>	<del>30 TAC Chapter 117, East Texas Combustion</del>	<del>§117.3300</del>	<del>Unit is not located in a county subject to this requirement.</del>
		WFP-1	OP-REQ2	40 CFR Part 60, Subpart IIII	§60.4200(a)(2)	Unit is not a stationary compression ignition internal combustion engine.
		WFP-1	OP-REQ2	40 CFR Part 60, Subpart JJJJ	§60.4230(a)(4)	Unit commenced construction or modification/reconstruction before 6/12/06.
		<del>WFP-1</del>	<del>OP-REQ2</del>	<del>40 CFR Part 63, Subpart ZZZZ</del>	<del>§63.6585(f)</del>	<del>Unit meets criteria of the listed emergency stationary RICE exempt from requirement.</del>

TCEQ-10017 (APD-ID156v2.0, Revised 07/22) Form OP-REQ2 - Negative Applicable/Superseded Requirement

Determinations This form for use by facilities subject to air quality permit requirements and may be revised periodically

(Title V Release 10/07)

**Commented [KD44R43]:** Please see comment above for Unit ID "EFP-1" for this same rule. Please add to Permit Shield.


**Commented [SQ43]:** It cannot be confused what county the unit is located in. Therefore, the citation is not necessary.

**Commented [KD46R45]:** Agreed. We have included a OP-UA2 and OP-REQ3 for this Unit ID for MACT ZZZZ as a separate attachment in our email response.

**Commented [SQ45]:** This site appears to be a manufacturing/industrial site. This rule only applies to commercial, residential, or institutional sites. I don't believe your site qualifies for this rule

**Form OP-CRO1**  
**Certification by Responsible Official**  
**Federal Operating Permit Program**

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

<b>I. Identifying Information</b>					
RN: 102886819		CN: 605931682		Account No.: HGA026Z	
Permit No.: O-04449			Project No.:		
Area Name: StarPak			Company Name: StarPak LLC		
<b>II. Certification Type</b> <i>(Please mark the appropriate box)</i>					
<input checked="" type="checkbox"/> Responsible Official			<input type="checkbox"/> Duly Authorized Representative		
<b>III. Submittal Type</b> <i>(Please mark the appropriate box) (Only one response can be accepted per form)</i>					
<input type="checkbox"/> SOP/TOP Initial Permit Application		<input checked="" type="checkbox"/> Update to Permit Application			
<input type="checkbox"/> GOP Initial Permit Application		<input type="checkbox"/> Permit Revision, Renewal, or Reopening			
<input type="checkbox"/> Other: _____					
<b>IV. Certification of Truth</b>					
<b>This certification does not extend to information which is designated by the TCEQ as information for reference only.</b>					
I, <u>Michael S. Ukropina</u> certify that I am the <u>RO</u> <i>(Certifier Name printed or typed)</i> <span style="float: right;"><i>(RO or DAR)</i></span>					
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:					
<i>Note: Enter Either a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>					
Time Period: From _____ to _____ <div style="text-align: center;"><i>Start Date</i> <span style="margin-left: 100px;"><i>End Date</i></span></div>					
Specific Dates: <u>12/04/2023</u> _____ <div style="text-align: center;"><i>Date 1</i> <span style="margin-left: 50px;"><i>Date 2</i></span> <span style="margin-left: 50px;"><i>Date 3</i></span> <span style="margin-left: 50px;"><i>Date 4</i></span> <span style="margin-left: 50px;"><i>Date 5</i></span> <span style="margin-left: 50px;"><i>Date 6</i></span></div>					
Signature: <u></u> Signature Date: <u>12/04/2023</u>					
Title: <u>Chief Executive Officer</u>					

**Texas Commission on Environmental Quality**  
**Application Area-Wide Applicability Determinations and General Information**  
**Form OP-REQ1**  
**Federal Operating Permit Program**

Date:	12/04/2023
Permit No.:	O-4449
RN No.:	102886819

*For SOP applications, answer ALL questions unless otherwise directed.*

◆ *For GOP applications, answer ONLY these questions unless otherwise directed.*

<b>Form OP-REQ1: Page 16</b>	
<b>V. Title 40 Code of Federal Regulations Part 59 (40 CFR Part 59) - National Volatile Organic Compound Emission Standards for Consumer and Commercial Products</b>	
<b>A. Subpart B - National Volatile Organic Compound Emission Standards for Automobile Refinish Coatings</b>	
1. The application area manufactures automobile refinishing coatings or coating components and sells or distributes these coatings or coating components in the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area imports automobile refinishing coatings or coating components, manufactured on or after January 11, 1999, and sells or distributes these coatings or coating components in the United States. <i>If the responses to Questions V.A.1 and V.A.2 are both "NO," go to Section V.B.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. All automobile refinishing coatings or coating components manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR § 59.100(c)(1) - (6).	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>B. Subpart C - National Volatile Organic Compound Emission Standards for Consumer Products</b>	
1. The application area manufactures consumer products for sale or distribution in the United States.	<input checked="" type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area imports consumer products manufactured on or after December 10, 1998 and sells or distributes these consumer products in the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area is a distributor of consumer products whose name appears on the label of one or more of the products. <i>If the responses to Questions V.B.1 - V.B.3 are all "NO," go to Section V.C.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
4. All consumer products manufactured, imported, or distributed by the application area meet one or more of the exemptions specified in 40 CFR § 59.201(c)(1) - (7).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

**Stationary Reciprocating Internal Combustion Engine Attributes**

**Form OP-UA2 (Page 4)**

**Federal Operating Permit Program**

**Table 2a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)**

**Subpart ZZZZ: National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines  
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
12/04/2023	O-4449	RN102886819

Unit ID No.	SOP/GOP Index No.	HAP Source	Brake HP	Construction/ Reconstruction Date	Nonindustrial Emergency Engine	Service Type	Stationary RICE Type
GEN-1	63ZZZZ-01	AREA	100-	02-06	NO	EMER-A	4SLB
WFP-1	63ZZZZ-01	AREA	100-250	02-06	NO	EMER-A	CI

**Applicable Requirements Summary  
Form OP-REQ3 (Page 1)  
Federal Operating Permit Program**

**Table 1a: Additions**

<b>Date:</b> 12/04/2023	<b>Regulated Entity No.:</b> RN102886819	<b>Permit No.:</b> O-4449
<b>Company Name:</b> StarPak LLC	<b>Area Name:</b> StarPak	

<b>Revision No.</b>	<b>Unit/Group/Process ID No.</b>	<b>Unit/Group/Process Applicable Form</b>	<b>SOP/GOP Index No</b>	<b>Pollutant</b>	<b>Applicable Regulatory Requirement Name</b>	<b>Applicable Regulatory Requirement Standard(s)</b>
	GEN-1	OP-UA2	63ZZZZ-01	HAP	MACT ZZZZ	§63.6603(a)-Table 2d.5, §63.6595(a)(1), §63.6605(a), §63.6605(b), §63.6625(e), §63.6625(f), §63.6625(h), §63.6625(j), §63.6640(f)(1), (f)(2), (f)(2)(i), §63.6640(f)(4), (f)(4)(i)
	WFP-1	OP-UA2	63ZZZZ-01	HAP	MACT ZZZZ	§63.6603(a)-Table 2d.4, §63.6595(a)(1), §63.6605(a)-(b), §63.6625(e), (f), (h), (i), §63.6640(f)(1), (f)(2), (f)(2)(i), §63.6640(f)(4), (f)(4)(i)

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program**

**Table 1b: Additions**

<b>Date:</b> 12/04/2023	<b>Regulated Entity No.:</b> RN102886819	<b>Permit No.:</b> O-4449
<b>Company Name:</b> StarPak LLC	<b>Area Name:</b> StarPak	

<b>Revision No.</b>	<b>Unit/Group/Process ID No.</b>	<b>SOP/GOP Index No.</b>	<b>Pollutant</b>	<b>Monitoring and Testing Requirements</b>	<b>Recordkeeping Requirements</b>	<b>Reporting Requirements</b>
	GEN-1	63ZZZZ-01	HAP	§63.6625(j), §63.6640(a), §63.6640(a)-Table 6.9.a.i-ii	§63.6625(j), §63.6655(e), (f), §63.6660(a)-(c)	§63.6640(e), §63.6650(f)
	WFP-1	63ZZZZ-01	HAP	§63.6625(i), §63.6640(a), §63.6640(a)-Table 6.9.a.i-ii	§63.6625(i), §63.6655(e)-(f), §63.6660(a)-(c)	§63.6640(e), §63.6650(f)

**From:** Savannah Quiros  
**Sent:** Tuesday, November 14, 2023 11:36 AM  
**To:** bgarris@fivestarmanagement.com  
**Subject:** RE: Working Draft Permit - FOP O4449/Project 35000, Starpak LLC/Starpak Houston Facility  
**Attachments:** 20230407-01\_OP-REQ2\_StarPak\_10052023.docx

Apologies,

I forgot to include the attachment about the permit shields. Here it is.

---

**From:** Savannah Quiros  
**Sent:** Tuesday, November 14, 2023 11:33 AM  
**To:** bgarris@fivestarmanagement.com  
**Subject:** Working Draft Permit - FOP O4449/Project 35000, Starpak LLC/Starpak Houston Facility

Bill,

I have conducted a technical review of the initial issuance application for Starpak LLC, Starpak Houston Facility. An electronic copy of the Working Draft Permit (WDP) is attached for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application.

I have also attached a document regarding your permit shields with notes as to why so many were not included in the permit.

Please review the WDP and submit to me any comments you have on it by **12/08/2023**. Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP, and approve of it.

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Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified application information, including application updates supporting the WDP comments, is required. After final review of the WDP, additional changes supported by application updates may require certification. I will advise you of these changes at a later date. Prior to transmittal of the Public Notice/Announcement Authorization Package, a duly signed OP-CRO1 form may be required which includes the specific dates or time-period of all submitted application documentation that was not previously certified. I will advise you of this requirement prior to sending the Public Notice/Announcement Authorization.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1. This form will be requested at a later date.

If you choose to submit your application updates through STEERS, please notify me when these updates have been submitted.

Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

*Savannah G. Quiros*

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

[savannah.quiros@tceq.texas.gov](mailto:savannah.quiros@tceq.texas.gov)

Phone: (512) 239-1830

Fax: (512) 239-1400



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at [www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)



**Form OP-REQ2**  
**Negative Applicable Requirement Determinations**  
**Texas Commission on Environmental Quality**

Date		Permit Number		Regulated Entity No.		
4/4/2023		TBA		RN102886819		
Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded	Negative Applicability/Superseded Requirement Reason
		<del>B-1</del>	<del>OP-REQ2</del>	<del>30 TAC Chapter 111, Incineration</del>	<del>§111.121</del>	<del>Unit does not meet definition of an incinerator as defined in §101.1.</del>
		B-1	OP-REQ2	30 TAC Chapter 113, Hospital/Medical/Infectious Waste Incinerators	§113.2071	Unit is not a designated facility with existing hospital/medical/infectious waste incinerator (HMIWI) units.
		<del>B-1</del>	<del>OP-REQ2</del>	<del>40 CFR Part 60, Subpart D</del>	<del>§60.40(a)</del>	<del>Unit does not have a heat input rate of more than 73 megawatts (MW); 250 MMBtu/hr).</del>
		B-1	OP-REQ2	40 CFR Part 60, Subpart Da	§60.40a(a)	Unit is not an electric utility steam generating unit.
		B-1	OP-REQ2	40 CFR Part 60, Subpart Db	§60.40b(a)	Unit is not a steam generating unit with a heat input capacity > 29 MW (100 MMBtu/hr).
		B-1	OP-REQ2	40 CFR Part 60, Subpart Dc	§60.40c(a)	Unit is not a steam generating unit with a heat input capacity > than 2.9 MW (10 MMBtu/hr) and < 29 MW (100MMBtu/hr).
		<del>B-1</del>	<del>OP-REQ2</del>	<del>40 CFR Part 60, Subpart TTTT</del>	<del>§60.5509(a)</del>	<del>Unit is not a steam generating unit, integrated gasification combined cycle (IGCC) facility, or a stationary combustion turbine that commenced construction after 1/8/14; or commenced modification or reconstruction after 6/18/14.</del>
		<del>B-1</del>	<del>OP-REQ2</del>	<del>40 CFR Part 63, Subpart EEE</del>	<del>§63.1200</del>	<del>Unit does not meet definition of a hazardous waste incinerator as defined in 40 CFR 63.1201(a).</del>
		B-1	OP-REQ2	40 CFR Part 63, Subpart DDDDD	§63.7485	Unit is not located at and is not part of a major source of HAPs.
		B-1	OP-REQ2	40 CFR Part 63, Subpart UUUUU	§63.9981	Unit is not a coal- or oil-fired electric utility steam generating unit as defined in § 63.10042.
		DIESEL1	OP-REQ2	30 TAC Chapter 115, Storage of VOCs	§115.111(a)(8)	Unit has a capacity less than or equal to 1,000 gal (3,785 L).
		<del>DIESEL1</del>	<del>OP-REQ2</del>	<del>40 CFR Part 60, Subpart K</del>	<del>§60.110(a)</del>	<del>Unit does not have a capacity greater than or equal to 40,000 gal (151,412 L).</del>

**Commented [SQ1]:** For citations §111.121 and §113.2071: These are incinerator rules not necessary for a boiler.

**Commented [SQ2]:** For streamlining purposes, I have cut citations from Subparts D, Da, Db, and Dc to one citation. I believe Dc fits best based on the information provided.

**Commented [SQ3]:** If this boiler is older, I suggest removing this citation from the OP-REQ2 since you don't need it.

**Commented [SQ4]:** This hazard waste incinerator rule is not necessary for this boiler.

**Commented [SQ5]:** Citations from Subparts K, Ka, and Kb can be cut down to one citation. The reasoning is fine, but you should choose one citation based on the age in the rule. For the WDP I chose Subpart Kb but let me know if you would like this changed.

**Form OP-REQ2**  
**Negative Applicable Requirement Determinations**  
**Texas Commission on Environmental Quality**

Date		Permit Number			Regulated Entity No.	
4/4/2023		TBA			RN102886819	
Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
		<del>DIESEL1</del>	<del>OP-REQ2</del>	<del>40 CFR Part 60, Subpart Ka</del>	<del>§60.110a(a)</del>	<del>Unit does not have a capacity greater than or equal to 40,000 gal (151,412 L).</del>
		DIESEL1	OP-REQ2	40 CFR Part 60, Subpart Kb	§60.110b(a)	Unit does not have a capacity greater than or equal to 19,800 gal (75 cubic meters).
		DIESEL1	OP-REQ2	40 CFR Part 61, Subpart Y	§61.270(a)	Unit does not store benzene.
		DIESEL1	OP-REQ2	40 CFR Part 63, Subpart OO	§63.900	Another subpart of 40 CFR Parts 60, 61, or 63 does not reference the use of this Subpart for air emission control.
		DIESEL2	OP-REQ2	30 TAC Chapter 115, Storage of VOCs	§115.111(a)(8)	Unit has a capacity less than or equal to 1,000 gal (3,785 L).
		<del>DIESEL2</del>	<del>OP-REQ2</del>	<del>40 CFR Part 60, Subpart K</del>	<del>§60.110(a)</del>	<del>Unit does not have a capacity greater than or equal to 40,000 gal (151,412 L).</del>
		DIESEL2	OP-REQ2	40 CFR Part 60, Subpart Ka	§60.110a(a)	Unit does not have a capacity greater than or equal to 40,000 gal (151,412 L).
		DIESEL2	OP-REQ2	40 CFR Part 60, Subpart Kb	§60.110b(a)	Unit does not have a capacity greater than or equal to 19,800 gal (75 cubic meters).
		DIESEL2	OP-REQ2	40 CFR Part 61, Subpart Y	§61.270(a)	Unit does not store benzene.
		DIESEL2	OP-REQ2	40 CFR Part 63, Subpart OO	§63.900	Another subpart of 40 CFR Parts 60, 61, or 63 does not reference the use of this Subpart for air emission control.
		<del>EFP-1</del>	<del>OP-UA2</del>	<del>30 TAC Chapter 117, East Texas Combustion</del>	<del>§117.3300</del>	<del>Unit is not located in a county subject to this requirement.</del>
		EFP-1	OP-UA2	40 CFR Part 60, Subpart JJJJ	§60.4230(a)(4)	Unit is not a stationary spark ignition internal combustion engine.
		<del>GEN-1</del>	<del>OP-REQ2</del>	<del>30 TAC Chapter 117, East Texas Combustion</del>	<del>§117.3300</del>	<del>Unit is not located in a county subject to this requirement.</del>
		GEN-1	OP-REQ2	40 CFR Part 60, Subpart IIII	§60.4200(a)(2)	Unit is not a stationary compression ignition internal combustion engine.
		GEN-1	OP-REQ2	40 CFR Part 60, Subpart JJJJ	§60.4230(a)(4)	Unit commenced construction or modification/reconstruction before 6/12/06.

**Commented [SQ6]:** Citations from Subparts K, Ka, and Kb can be cut down to one citation. The reasoning is fine, but you should choose one citation based on the age in the rule. For the WDP I chose Subpart Kb but let me know if you would like this changed.

**Commented [SQ7]:** I suggest removing this citation from the OP-REQ2 as it cannot be potentially applicable that the county the unit is located in will change. Therefore, the citation is not necessary.

**Commented [SQ8]:** I suggest removing this citation from the OP-REQ2 as it cannot be confused what county the unit is located in. Therefore, the citation is not necessary.

**Form OP-REQ2**  
**Negative Applicable Requirement Determinations**  
**Texas Commission on Environmental Quality**

Date		Permit Number		Regulated Entity No.		
4/4/2023		TBA		RN102886819		
Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded	Negative Applicability/Superseded Requirement Reason
		<del>GEN-1</del>	<del>OP-REQ2</del>	40 CFR Part 63, Subpart <del>ZZZZ</del>	<del>§63.6585(f)</del>	Unit meets criteria of the listed emergency stationary RICE exempt from requirement.
		GRP-OX	OP-REQ2	30 TAC Chapter 111, Incineration	§111.121	Units are not incinerators as defined in §101.1.
		<del>GRP-OX</del>	<del>OP-REQ2</del>	<del>30 TAC Chapter 113, Hospital/Medical/Infectious Waste Incinerators</del>	<del>§113.2071</del>	Unit is not a designated facility with existing hospital/medical/infectious waste incinerator (HMIWI) units.
		GRP-OX	OP-REQ2	30 TAC Chapter 115, Vent Gas Control	§115.127(a)(7)	All VOCs in the vent gas stream originate from another source which is subject to a different Division within 30 TAC Chapter 115 and vent gas stream does not contain any highly reactive VOCs.
		<del>GRP-OX</del>	<del>OP-REQ2</del>	40 CFR Part 60, Subpart E	<del>§60.50(a)</del>	Units are not incinerators of more than 45 metric tons per day charging rate (50 tons/day).
		<del>GRP-OX</del>	<del>OP-REQ2</del>	40 CFR Part 60, Subpart O	<del>§60.150(a)</del>	Units are not incinerators burning waste containing sewage sludge.
		GRP-OX	OP-REQ2	40 CFR Part 61, Subpart C	§61.30	Units are not extraction plants, ceramic plants, foundries, incinerators, and propellant plants which process beryllium ore, beryllium, beryllium oxide, beryllium alloys, or beryllium containing waste; and do not process beryllium ore, metal, oxide, alloys, or beryllium containing waste.
		<del>GRP-OX</del>	<del>OP-REQ2</del>	40 CFR Part 61, Subpart E	<del>§61.50</del>	Units do not process mercury ore, use mercury chlor-alkali cells to produce chlorine gas and/or alkali metal hydroxide, or incinerate or dry wastewater treatment plant sludge.
		<del>GRP-OX</del>	<del>OP-REQ2</del>	40 CFR Part 63, Subpart <del>EEE</del>	<del>§63.1200</del>	Units are not hazardous waste combustors.
		GRP-DRYR	OP-REQ2	30 TAC Chapter 111, Incineration	§111.121	Units are not incinerators as defined in §101.1 used to burn waste.

**Commented [SQ9]:** This site appears to be a manufacturing/industrial site. This rule only applies to commercial, residential, or institutional sites. I don't believe your site qualifies for this rule

**Commented [SQ10]:** Your site is a different industry from this rule. I don't believe your site qualifies for this rule

**Commented [SQ11]:** To streamline these citations: if the rules are for completely different industries from your site, it is not necessary to have these shields, such as: Part 61 Subparts C and E, Part 60 Subpart O, Chapter 113 (above).

**Form OP-REQ2**  
**Negative Applicable Requirement Determinations**  
**Texas Commission on Environmental Quality**

Date		Permit Number			Regulated Entity No.	
4/4/2023		TBA			RN102886819	
Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded	Negative Applicability/Superseded Requirement Reason
		GRP-DRYR	OP-REQ2	30 TAC Chapter 112, Control of Sulfur Compounds	§112.9	Units are not liquid fuel-fired heaters or furnaces.
		GRP-DRYR	OP-REQ2	30 TAC Chapter 117, Multi-Region Combustion Control	§117.3400	Facility does not have cement kilns on site.
		GRP-DRYR	OP-REQ2	40 CFR Part 60, Subpart PP	§60.420(a)	Facility is not an ammonium sulfate dryer within the ammonium sulfate industry.
		GRP-DRYR	OP-REQ2	40 CFR Part 61, Subpart E	§61.50	Units do not process mercury ore, use mercury-chlor-alkali cells to produce chlorine gas and/or alkali metal hydroxide, or incinerate or dry wastewater treatment plant sludge.
		GRP-DRYR	OP-REQ2	40 CFR Part 61, Subpart K	§61.120	Facility is not a calciner or nodulizing kiln at an elemental phosphorous plant.
		GRP-DRYR	OP-REQ2	40 CFR Part 63, Subpart EEE	§63.1200	Units are not hazardous waste combustors.
		GRP-DRYR	OP-REQ2	40 CFR Part 63, Subpart DDDDD	§63.7485	Units are not boiler or process heaters as defined in §63.7485 at a major source of HAPs.
		GRP-DRYR	OP-REQ2	40 CFR Part 63, Subpart JJJJJ	§63.8380	Site is not a brick or structural clay products manufacturing facility.
		GRP-PRNT	OP-UA22	30 TAC Chapter 115, Offset Lithographic Printing	§115.440(a)	Offset lithographic printing press lines are not present onsite.
		GRP-PRNT	OP-UA22	40 CFR Part 60, Subpart QQ	§60.430(a)	Units are not publication rotogravure printing presses.
		GRP-PRNT	OP-UA22	40 CFR Part 60, Subpart FFF	§60.580(a)	Rotogravure printing lines are not present onsite.
		GRP-PRNT	OP-UA22	40 CFR Part 63, Subpart KK	§63.820(a)	Site is not a major source of hazardous air pollutants (HAP).
		T-1	OP-UA3	40 CFR Part 60, Subpart K	§60.110(a)	Unit does not store petroleum liquids.
		T-1	OP-UA3	40 CFR Part 60, Subpart Ka	§60.110a(a)	Unit does not store petroleum liquids.

**Commented [SQ12]:** This rule is fine, but you need to specify the fuel types: "Units are not liquid or solid fuel-fired."

**Commented [SQ13]:** This rule is not potentially applicable, so it is not necessary.

**Commented [SQ14]:** These rules are for a completely different industry type, so they are not necessary.

**Commented [SQ15]:** This rule is not industrially related, so it is not necessary.

**Commented [SQ16]:** If these units are not on-site at all, you don't need these shields. Let me know if otherwise

**Commented [SQ17]:** Citations from Subparts K, Ka, and Kb can be cut down to one citation. The reasoning is fine, but you should choose one citation based on the age in the rule. For the WDP I chose Subpart Kb but let me know if you would like this changed

**Form OP-REQ2**  
**Negative Applicable Requirement Determinations**  
**Texas Commission on Environmental Quality**

Date		Permit Number			Regulated Entity No.	
4/4/2023		TBA			RN102886819	
Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
		T-1	OP-UA3	40 CFR Part 60, Subpart Kb	§60.110b(a)	Unit does not have a capacity greater than or equal to 19,800 gal (75 cubic meters).
		T-1	OP-UA3	40 CFR Part 61, Subpart Y	§61.270(a)	Unit does not store benzene.
		T-1	OP-UA3	40 CFR Part 63, Subpart OO	§63.900	Another subpart of 40 CFR Parts 60, 61, or 63 does not reference the use of this Subpart for air emission control.
		T-2	OP-UA3	40 CFR Part 60, Subpart K	§60.110(a)	Unit does not store petroleum liquids.
		T-2	OP-UA3	40 CFR Part 60, Subpart Ka	§60.110a(a)	Unit does not store petroleum liquids.
		T-2	OP-UA3	40 CFR Part 60, Subpart Kb	§60.110b(a)	Unit does not have a capacity greater than or equal to 19,800 gal (75 cubic meters).
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		T-3	OP-UA3	40 CFR Part 60, Subpart K	§60.110(a)	Unit does not store petroleum liquids.
		T-3	OP-UA3	40 CFR Part 60, Subpart Ka	§60.110a(a)	Unit does not store petroleum liquids.
		T-3	OP-UA3	40 CFR Part 60, Subpart Kb	§60.110b(a)	Unit does not have a capacity greater than or equal to 19,800 gal (75 cubic meters).
		T-3	OP-UA3	40 CFR Part 61, Subpart Y	§61.270(a)	Unit does not store benzene.
		T-3	OP-UA3	40 CFR Part 63, Subpart OO	§63.900	Another subpart of 40 CFR Parts 60, 61, or 63 does not reference the use of this Subpart for air emission control.
		T-4	OP-UA3	40 CFR Part 60, Subpart K	§60.110(a)	Unit does not store petroleum liquids.
		T-4	OP-UA3	40 CFR Part 60, Subpart Ka	§60.110a(a)	Unit does not store petroleum liquids.
		T-4	OP-UA3	40 CFR Part 60, Subpart Kb	§60.110b(a)	Unit does not have a capacity greater than or equal to 19,800 gal (75 cubic meters).
		T-4	OP-UA3	40 CFR Part 61, Subpart Y	§61.270(a)	Unit does not store benzene.

**Commented [SQ18]:** Citations from Subparts K, Ka, and Kb can be cut down to one citation. The reasoning is fine, but you should choose one citation based on the age in the rule. For the WDP I chose Subpart Kb but let me know if you would like this changed

**Commented [SQ19]:** Citations from Subparts K, Ka, and Kb can be cut down to one citation. The reasoning is fine, but you should choose one citation based on the age in the rule. For the WDP I chose Subpart Kb but let me know if you would like this changed

**Commented [SQ20]:** Citations from Subparts K, Ka, and Kb can be cut down to one citation. The reasoning is fine, but you should choose one citation based on the age in the rule. For the WDP I chose Subpart Kb but let me know if you would like this changed

**Form OP-REQ2**  
**Negative Applicable Requirement Determinations**  
**Texas Commission on Environmental Quality**

Date			Permit Number		Regulated Entity No.	
4/4/2023			TBA		RN102886819	
		T-4	OP-UA3	40 CFR Part 63, Subpart OO	\$63.900	Another subpart of 40 CFR Parts 60, 61, or 63 does not reference the use of this Subpart for air emission control.
Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded	Negative Applicability/Superseded Requirement Reason
		<del>WFP-1</del>	<del>OP-REQ2</del>	<del>30 TAC Chapter 117, East Texas Combustion</del>	<del>\$117.3300</del>	<del>Unit is not located in a county subject to this requirement.</del>
		WFP-1	OP-REQ2	40 CFR Part 60, Subpart IIII	\$60.4200(a)(2)	Unit is not a stationary compression ignition internal combustion engine.
		WFP-1	OP-REQ2	40 CFR Part 60, Subpart JJJJ	\$60.4230(a)(4)	Unit commenced construction or modification/reconstruction before 6/12/06.
		<del>WFP-1</del>	<del>OP-REQ2</del>	<del>40 CFR Part 63, Subpart ZZZZ</del>	<del>\$63.6585(f)</del>	<del>Unit meets criteria of the listed emergency stationary RICE exempt from requirement.</del>

TCEQ-10017 (APD-ID156v2.0, Revised 07/22) Form OP-REQ2 - Negative Applicable/Superseded Requirement

Determinations This form for use by facilities subject to air quality permit requirements and may be revised periodically

(Title V Release 10/07)

**Commented [SQ21]:** It cannot be confused what county the unit is located in. Therefore, the citation is not necessary.

**Commented [SQ22]:** This site appears to be a manufacturing/industrial site. This rule only applies to commercial, residential, or institutional sites. I don't believe your site qualifies for this rule

**From:** Savannah Quiros  
**Sent:** Tuesday, November 14, 2023 11:33 AM  
**To:** bgarris@fivestarmanagement.com  
**Subject:** Working Draft Permit - FOP O4449/Project 35000, Starpak LLC/Starpak Houston Facility  
**Attachments:** WDP - O4449 Starpak LLC (Initial, 35000).docx

Bill,

I have conducted a technical review of the initial issuance application for Starpak LLC, Starpak Houston Facility. An electronic copy of the Working Draft Permit (WDP) is attached for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application.

I have also attached a document regarding your permit shields with notes as to why so many were not included in the permit.

Please review the WDP and submit to me any comments you have on it by **12/08/2023**. Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP, and approve of it.

Please review the second portion of the "SOP Technical Review Fact Sheet" located at [http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_factsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf) This guidance contains important information regarding WDP review and comment procedures.

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified application information, including application updates supporting the WDP comments, is required. After final review of the WDP, additional changes supported by application updates may require certification. I will advise you of these changes at a later date. Prior to transmittal of the Public Notice/Announcement Authorization Package, a duly signed OP-CRO1 form may be required which includes the specific dates or time-period of all submitted application documentation that was not previously certified. I will advise you of this requirement prior to sending the Public Notice/Announcement Authorization.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1. This form will be requested at a later date.

If you choose to submit your application updates through STEERS, please notify me when these updates have been submitted.

Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

*Savannah G. Quiros*

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

[savannah.quiros@tceq.texas.gov](mailto:savannah.quiros@tceq.texas.gov)

Phone: (512) 239-1830

Fax: (512) 239-1400



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at [www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)



**From:** Savannah Quiros  
**Sent:** Wednesday, July 19, 2023 9:34 AM  
**To:** Bill Garris  
**Subject:** RE: Title V - Starpak LLC

Hi Bill,

I'm working on data entry, but the large number of permit shields requests is why it's taking so long. I'm currently working with my technical specialist on this application, as there may be a lot of potential denials of permit shields.

Thank you for your patience,

Sincerely,

Savannah G. Quiros  
Permit Reviewer  
OA/Air Permits Division/OP Section  
Texas Commission on Environmental Quality MC-163, P.O. Box 13087 Austin, TX 78711-3087  
savannah.quiros@tceq.texas.gov

Phone: (512) 239-1830

Fax: (512) 239-1400

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at [www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

-----Original Message-----

From: Bill Garris <[bgarris@fivestarmanagement.com](mailto:bgarris@fivestarmanagement.com)>  
Sent: Wednesday, July 19, 2023 9:13 AM  
To: Savannah Quiros <[Savannah.Quiros@tceq.texas.gov](mailto:Savannah.Quiros@tceq.texas.gov)>  
Subject: RE: Title V - Starpak LLC

Savannah,

Can you give me a status on the progress of Starpak's Title V application?

Regards,

William Garris  
Five Star  
(336) 462-7064 (M)

(832) 782-5613 (O)

-----Original Message-----

From: Brandon Marsh <Brandon.Marsh@Tceq.Texas.Gov>  
Sent: Tuesday, May 30, 2023 10:51 AM  
To: Bill Garris <bgarris@fivestarmanagement.com>  
Cc: Savannah Quiros <Savannah.Quiros@tceq.texas.gov>  
Subject: RE: Title V - Starpak LLC

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Bill,

Thanks for the follow-up! I have moved down to the New Source Review Chemical Section, but I looked up your RN. We received your application on April 7, 2023.

The permit reviewer in the Operating Permits Section who has your initial is Savannah Quiros. I have copied her on this email. It looks like it is project number 35000, and your new permit number will be 04449.

Thank You,

-Brandon Marsh, P.E.

Air Permits Division

Texas Commission on Environmental Quality P.O. Box 13087, MC 163 Austin, TX 78711

Phone: 512.239.1280

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[https://nam11.safelinks.protection.outlook.com/?url=https%3A%2F%2Flinkprotect.cudasvc.com%2Furl%3Fa%3Dhttps%253a%252f%252f%252f%252fat%2520www.tceq.texas.gov%252fcustomersurvey%26c%3DE%2C1%2C-oTa1TBkL-XauITbAUTXX2GtKUufbft3MpiUFL6jbMfOKfPS69WOUAj4fPaQOf\\_-B8iITbasVT6iQDjtdsFqRLwxjxtQ9dK5iM4KekWBPjRh%26typo%3D1&data=05%7C01%7Csavannah.quiros%40tceq.texas.gov%7C6042ddbcafc345142e0208db88623fc7%7C871a83a4a1ce4b7a81563bcd93a08fba%7C0%7C0%7C638253727801937965%7CUnknown%7CTWFpbGZsb3d8eyJWIjojMC4wLjAwMDAiLCJQljoiv2luMzliLCJBTiI6lk1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=DHm0SMwwYlv%2BW4JEk1mb3IPokNKYFRQozREiZ7e2HMG%3D&reserved=0](https://nam11.safelinks.protection.outlook.com/?url=https%3A%2F%2Flinkprotect.cudasvc.com%2Furl%3Fa%3Dhttps%253a%252f%252f%252f%252fat%2520www.tceq.texas.gov%252fcustomersurvey%26c%3DE%2C1%2C-oTa1TBkL-XauITbAUTXX2GtKUufbft3MpiUFL6jbMfOKfPS69WOUAj4fPaQOf_-B8iITbasVT6iQDjtdsFqRLwxjxtQ9dK5iM4KekWBPjRh%26typo%3D1&data=05%7C01%7Csavannah.quiros%40tceq.texas.gov%7C6042ddbcafc345142e0208db88623fc7%7C871a83a4a1ce4b7a81563bcd93a08fba%7C0%7C0%7C638253727801937965%7CUnknown%7CTWFpbGZsb3d8eyJWIjojMC4wLjAwMDAiLCJQljoiv2luMzliLCJBTiI6lk1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=DHm0SMwwYlv%2BW4JEk1mb3IPokNKYFRQozREiZ7e2HMG%3D&reserved=0)

-----Original Message-----

From: Bill Garris <bgarris@fivestarmanagement.com>  
Sent: Tuesday, May 30, 2023 10:25 AM  
To: Brandon Marsh <Brandon.Marsh@Tceq.Texas.Gov>  
Subject: Title V - Starpak LLC

Brandon,

I submitted Title V application on April 4, 2023. Haven't heard anything to date. What is the process for this review and when do you think I will be contacted. How long does this process normally take?

HGA026Z  
CN605931682  
RN102886819

Thank you in advance for your help...

Regards,

William Garris  
Starpak LLC  
9690 W.Wingfoot Road  
Houston, Tx 77041

832 782-5613 (O)  
336 462-7064 (M)

StarPak LLC

# StarPak Initial Title V Application

April 2023

## StarPak Initial Title V Application

April 2023

**Prepared By:**

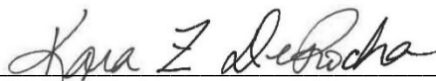
Arcadis U.S., Inc.  
10205 Westheimer Road, Suite 800  
Houston  
Texas 77042  
Phone: 713 953 4800  
Fax: 713 977 4620

**Prepared For:**

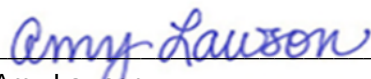
StarPak LLC

**Our Ref:**

30135006



Kara DeRocha  
Project Air Quality Specialist



Amy Lawson  
Gulf Coast Air Services Leader

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- Appendix B. TCEQ Potentially Applicable Requirements Forms
- Appendix C. TCEQ OP-UA Forms
- Appendix D. TCEQ Other Forms

## Acronyms and Abbreviations

Btu/hr	British thermal units/hour
EPA	Environmental Protection Agency
FIN	Facility Identification Number
MSS	Maintenance, Startup and Shutdown
NP Acetate	Normal Propyl Acetate
NP Alcohol	Normal Propyl Alcohol
PBR	Permits by Rule
PFD	Process Flow Diagram
PTE	Permanent Total Enclosure
RTO	Regenerative Thermal Oxidizer
StarPak	StarPak LLC
TCEQ	Texas Commission on Environmental Quality
tpy	tons per year
USGS	United States Geological Survey
VOC	Volatile Organic Compound

# 1 Introduction

StarPak LLC (StarPak) has ongoing printing operations at its Houston, Harris County, Texas site that is currently permitted under NSR Permit No. 108176 and various Permits by Rule (PBRs). On October 7, 2022 the Environmental Protection Agency (EPA) reclassified the Harris County 2008 8-hour ozone standard designation from “serious” to “severe”. In response, StarPak is submitting an initial Title V Application as the site is now a major source of Volatile Organic Compounds (VOC) emissions. Table 1-1 shows an emission point that is present onsite but is addressed entirely in OP-REQ1, and therefore, is not listed individually on any Title V forms.

Table 1-1. Omitted Sources

Source	Authorization	Reason
MSS-PAINT	De Minimis	De Minimis Maintenance Paint Activities

Included in this Title V application are descriptions of the process and required figures, as well as TCEQ forms and supplemental information.

## 1.1 Area Map and Plot Plan

The Houston StarPak site is located at 9690 W Wingfoot Rd, Houston, Harris County, Texas. Figure 1-1 is a United States Geological Survey (USGS) map, which includes a 3,000-foot radius circle. This map provides the site orientation, scale, and plant boundaries. Figure 1-2 is a plot plan that shows site boundaries and location of all Unit IDs represented on the OP-SUM form. There are no schools located within 3,000 feet of the site’s property line.

## 1.2 TCEQ Forms and Supplemental Information

Appendices A, B, C, and D of this application contain the following TCEQ permit application forms and supplemental information:

### Appendix A—TCEQ Administrative Forms

- Core Data Form
- OP-CRO1
- OP-1
- OP-2
- OP-SUM
- OP-ACPS



## StarPak Initial Title V Application

### Appendix B—TCEQ Potentially Applicable Requirements Forms

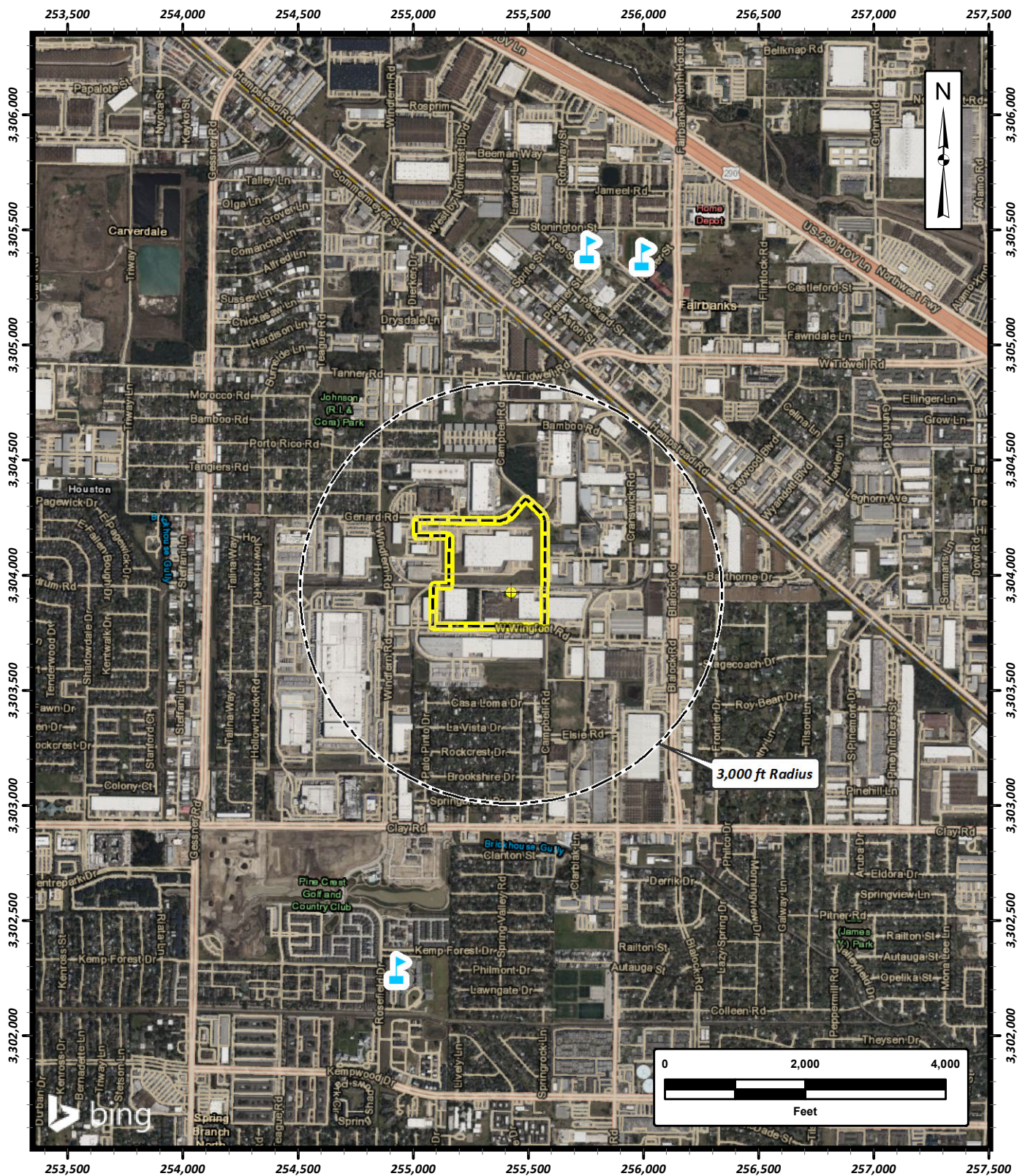
- OP-REQ1
- OP-REQ2
- OP-REQ3



### Appendix C—TCEQ OP-UA Forms

- OP-UA2
- OP-UA3
- OP-UA4
- OP-UA15
- OP-UA22

### Appendix D—TCEQ Other Forms

- OP-MON
- OP-PBRSUP



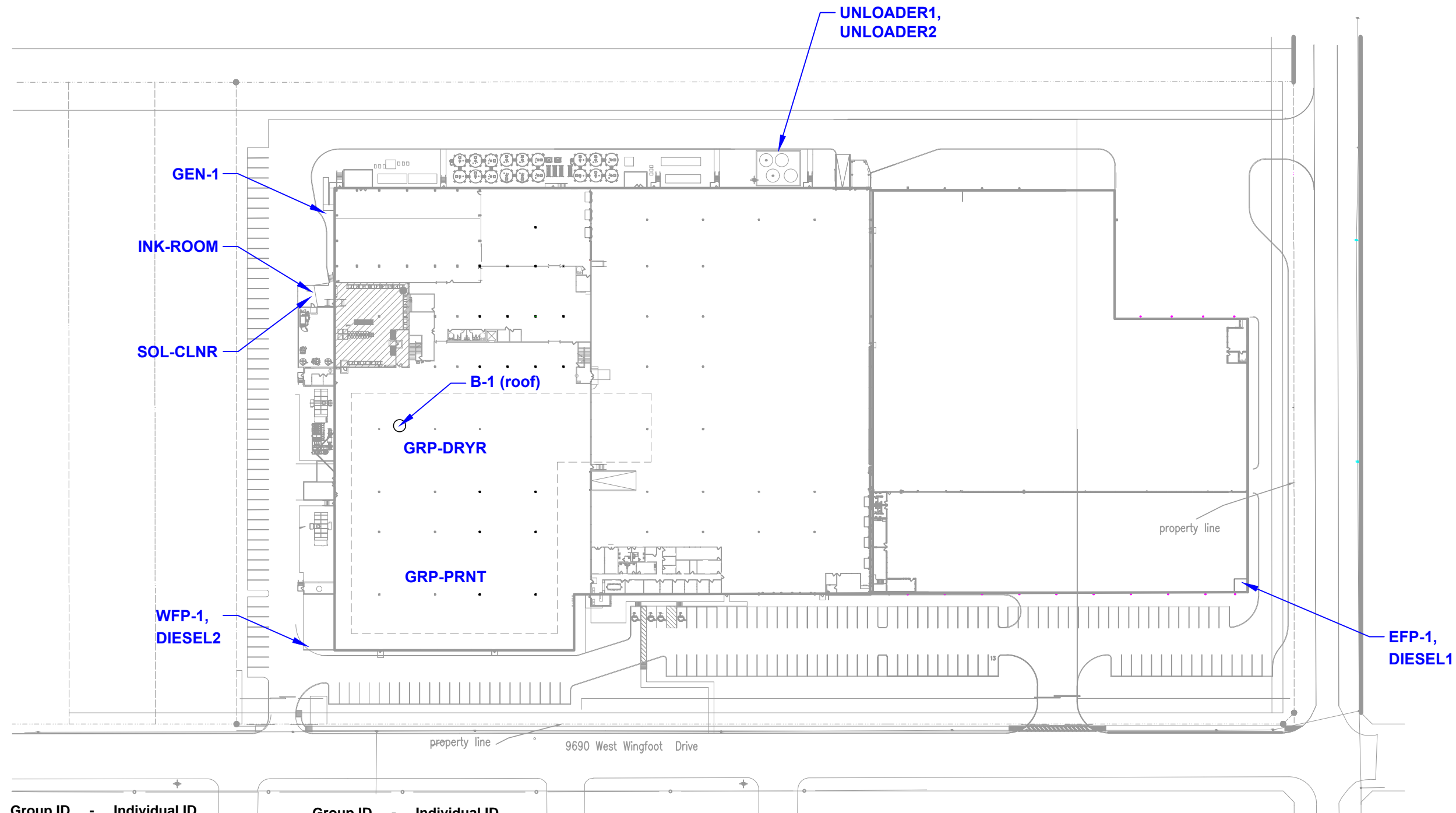
-  School
-  Property Line

StarPak LLC  
9690 W. Wingfoot Road Houston, TX 77041  
Title V Permit Application

**Area Map**  
April 2023



CITY: (Reqd) DIV: GROUP: (Reqd) DB: (Reqd) LD: (Opt) PIC: (Opt) PM: (Reqd) TM: (Opt) LVR: (Opt) ON: "OFF" = REF\*  
D:\Arcadis\Air Services\Starpak\Title V\StarPak.TV plot plan.dwg LAYOUT: 1-2 SAVED: 3/31/2023 3:22 PM ACADVER: 21.05 (LMS TECH) PAGESETUP: SETUP1 PLOTSTYLETABLE: .... PLOTTED: 3/31/2023 3:23 PM BY: BERRY, WAYNE  
XREFS: IMAGES: PROJECTNAME: 2015\_LogoUpdate\_Secondary.jpg



Group ID	-	Individual ID
GRP-DRYR	-	PRNTDRYR1
	-	PRNTDRYR2
	-	PRNTDRYR3
	-	PRNTDRYR5
	-	PRNTDRYR6
	-	PRNTDRYR7
	-	PRNTDRYR8
	-	PRNTDRYR9
	-	PRNTDRYR10
	-	PRNTDRYR11
	-	PRNTDRYR12
	-	PRNTDRYR13
	-	PRNTDRYR14
	-	PRNTDRYR15

Group ID	-	Individual ID
GRP-PRNT	-	PRNTPRSS1
	-	PRNTPRSS2
	-	PRNTPRSS3
	-	PRNTPRSS5
	-	PRNTPRSS6
	-	PRNTPRSS7
	-	PRNTPRSS8
	-	PRNTPRSS9
	-	PRNTPRSS10
	-	PRNTPRSS11
	-	PRNTPRSS12
	-	PRNTPRSS13
	-	PRNTPRSS14
	-	PRNTPRSS15



StarPak LLC  
9690 W. Wingfoot Road, Houston, TX 77041  
Title V Permit Application

**PLOT PLAN**  
April 2023



FIGURE  
**1-2**

## 2 Process Description

StarPak has ongoing operations at its Houston, Harris County, Texas site that are currently permitted for twelve 10-color presses, two 8-color presses, and three Regenerative Thermal Oxidizers (RTO) of 60,000, 30,000 and 55,000 SCFM, respectively. Emissions from the presses, which are totally enclosed in a permanent total enclosure (PTE), are routed to the existing RTO (Unit IDs: OX-1, OX-2, OX-3) management system. The presses (Unit IDs: PRNTPRSS1, PRNTPRSS2, PRNTPRSS3, PRNTPRSS5, PRNTPRSS6, PRNTPRSS7, PRNTPRSS8, PRNTPRSS9, PRNTPRSS10, PRNTPRSS11, PRNTPRSS12, PRNTPRSS13, PRNTPRSS14, PRNTPRSS15) are used to print on a low-density polyethylene substrate (0.00528 pounds per square foot) to produce consumer product bags and stretch wrap. The presses operate up to 24 hours per day, 365 days per year. When accounting for general maintenance, startup and cleanout between product runs, actual operating time for each press is currently authorized at 4,555 hours per year (52% uptime).

Flexography is a method of direct rotary sprinting using raised-image printing plates and fluid inks. The inks are applied to the plate with a metering cylinder. From the plate, the ink is transferred directly to the substrate. Flexography is similar to letterpress in that both use a raised-image plate. It is similar to rotogravure by virtue of the inks being transferred directly to the substrate. It least resembles offset lithography as offset is an indirect printing process and utilizes relatively viscous oil-based inks.

Flexographic technology has developed to the point that high quality process printing is easily achieved. Flexography is mostly used for packaging and specialty printing such as labels, linerboard, bread bags, multi-walled bags, tissues, paper towels, cartons, etc. Utilizing advanced materials and equipment, flexography can be used to print many publications, including newspapers, flyers, direct mailers, catalogs, etc. About 90 percent of flexographic printing is done for packaging materials.

The substrate material printed on may be paper, plastics such as polypropylene, or other surfaces. Printing and coating both involve the application of a relatively high solvent content material to the surface of a moving web, rapid solvent evaporation by movement of heated air across the wet surface in a dryer, and solvent-laden air exhausted from the system. The dryers (Unit IDs: PRNTDRYR1, PRNTDRYR2, PRNTDRYR3, PRNTDRYR5, PRNTDRYR6, PRNTDRYR7, PRNTDRYR8, PRNTDRYR9, PRNTDRYR10, PRNTDRYR11, PRNTDRYR12, PRNTDRYR13, PRNTDRYR14, PRNTDRYR15) used at StarPak are natural gas-fired.

Inks used in the graphic arts industry consist of pigments, binders (which are solid components that lock the pigments to the substrate), and solvents (which disperse the pigments and binders). The binders usually are composed of organic resins and polymers or oils and resins. Solvents are usually organic compounds. Inks used in flexographic printing contain from 50 to 90 volume percent low boiling point solvent. They must have low viscosities. Typical solvents include alcohols, acetates, aliphatic naphthas, aromatic hydrocarbons, esters, glycol ethers, ketones, and nitroparaffins.

A number of inks are used on the presses, and for all existing presses at StarPak the inks are solvent based, with the exception of Press 14, which can use water-based or solvent inks in one of its eleven print stations. In addition, printing inks must maintain specific viscosities for proper application. This is accomplished with the automatic addition of solvents, normal propyl acetate (NP acetate)/normal propyl alcohol (NP alcohol), during the printing process.

Small amounts of VOC emissions (Unit ID: INK-ROOM) are released from containers that are opened and mixed during the color matching process.

The printing presses require parts washing after each printing job to allow for color changes for the next job. This is accomplished by the replacement of all ink contaminated parts with clean parts for the next job. The ink contaminated parts are transferred to the cleaning room parts washer (Unit ID: SOL-CLNR). The parts washer uses an NP Alcohol and NP Acetate mixture to clean parts through an automatic machine process. In this process, volumes of liquid and solids are minimum and are recycled for re-use of the solvent.

All VOC emissions captured from the flexographic presses are routed to a central vapor collection system and then to one of three regenerative thermal oxidizers.

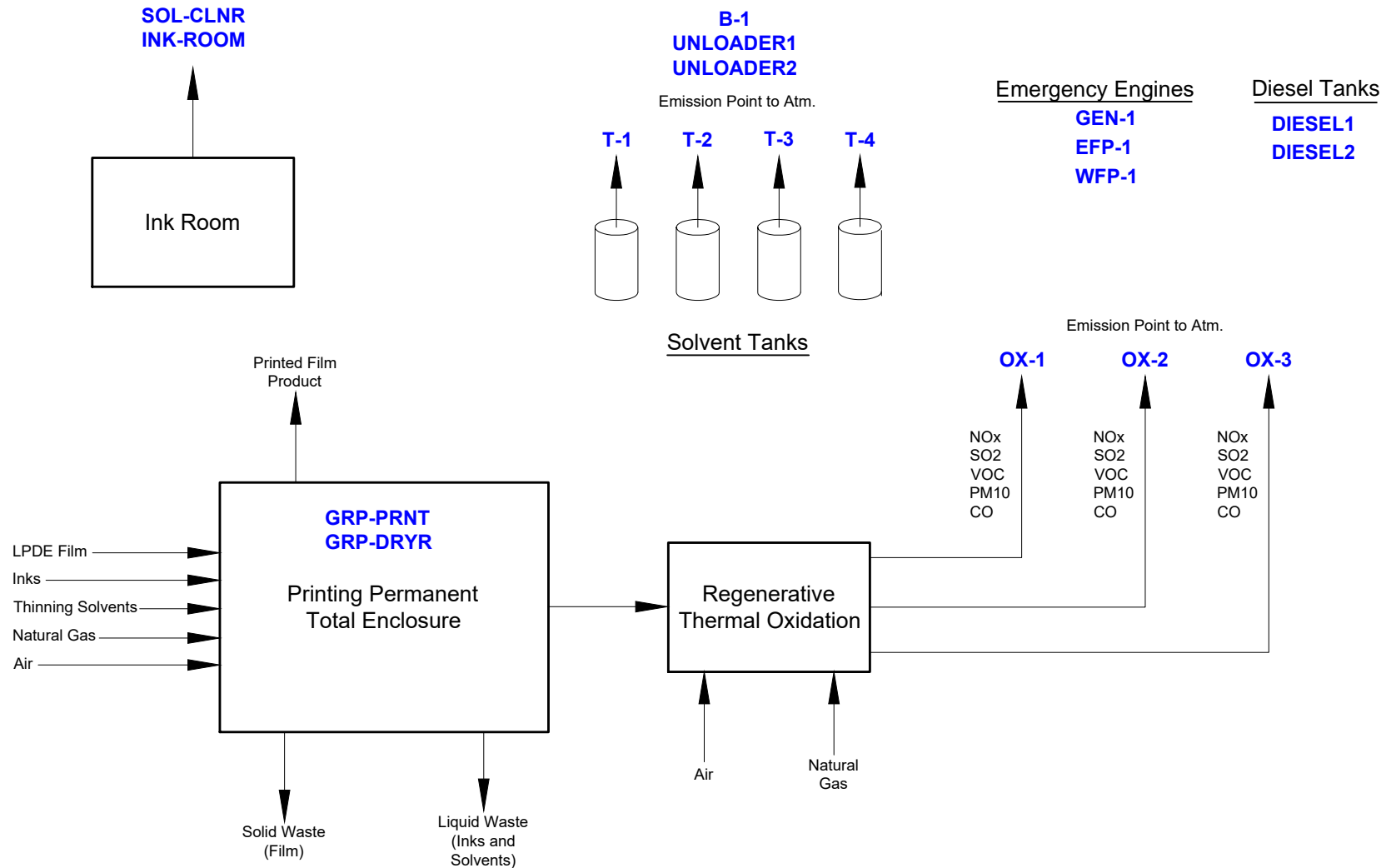
Normal propyl alcohol and normal propyl acetate is transported to the site in tanker trucks and unloaded into one of four storage tanks (Unit IDs: T-1, T-2, T-3, T-4) on the property. The tanks are filled one at a time. Substances are unloaded (Unit IDs: UNLOADER1, UNLOADER2) into these tanks on an as needed basis, approximately weekly, to maintain the required amount needed for the printing presses and cleaning operations. Substances are mixed and stored on-site to create solvents as needed.

A 990,000 British thermal units/ hour (btu/hr) natural gas boiler (Unit ID: Boiler 1) is present onsite. The boiler is only used for a limited number of hours in the winter months to maintain water temperature in HVAC coils above freezing temperatures when ambient temperatures in Houston drop below freezing.

There are also three emergency engines onsite (Unit IDs: EFP-1, GEN-1, WFP-1) and two associated diesel storage tanks (Unit IDs: DIESEL1, DIESEL2) which store fuel for the two fire pump engines (Unit IDs: EFP-1, WFP-1).

Figure 2-1 contains a process flow diagram (PFD) for the process described above.

XREFS: IMAGES: PROJECTNAME: ----



StarPak LLC  
9690 W. Wingfoot Road, Houston, TX 77041  
Title V Permit Application

**Process Flow Diagram**  
April 2023

# Appendix A

## **TCEQ Administrative Forms**



# TCEQ Core Data Form

For detailed instructions on completing this form, please read the Core Data Form Instructions or call 512-239-5175.

## SECTION I: General Information

<b>1. Reason for Submission</b> (If other is checked please describe in space provided.)		
<input checked="" type="checkbox"/> New Permit, Registration or Authorization (Core Data Form should be submitted with the program application.)		
<input type="checkbox"/> Renewal (Core Data Form should be submitted with the renewal form)		<input type="checkbox"/> Other
<b>2. Customer Reference Number</b> (if issued)	<a href="#">Follow this link to search for CN or RN numbers in Central Registry**</a>	<b>3. Regulated Entity Reference Number</b> (if issued)
CN 605931682		RN 102886819

## SECTION II: Customer Information

<b>4. General Customer Information</b>		<b>5. Effective Date for Customer Information Updates</b> (mm/dd/yyyy)		04/04/2023	
<input type="checkbox"/> New Customer <input checked="" type="checkbox"/> Update to Customer Information <input type="checkbox"/> Change in Regulated Entity Ownership					
<input type="checkbox"/> Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts)					
<i>The Customer Name submitted here may be updated automatically based on what is current and active with the Texas Secretary of State (SOS) or Texas Comptroller of Public Accounts (CPA).</i>					
<b>6. Customer Legal Name</b> (If an individual, print last name first: eg: Doe, John)				<i>If new Customer, enter previous Customer below:</i>	
StarPak LLC					
<b>7. TX SOS/CPA Filing Number</b>		<b>8. TX State Tax ID</b> (11 digits)		<b>9. Federal Tax ID</b> (9 digits)	<b>10. DUNS Number</b> (if applicable)
803876076		30119318340		50-0016972	
<b>11. Type of Customer:</b>		<input type="checkbox"/> Corporation		<input type="checkbox"/> Individual	Partnership: <input type="checkbox"/> General <input checked="" type="checkbox"/> Limited
Government: <input type="checkbox"/> City <input type="checkbox"/> County <input type="checkbox"/> Federal <input type="checkbox"/> Local <input type="checkbox"/> State <input type="checkbox"/> Other		<input type="checkbox"/> Sole Proprietorship		<input type="checkbox"/> Other:	
<b>12. Number of Employees</b>				<b>13. Independently Owned and Operated?</b>	
<input type="checkbox"/> 0-20 <input type="checkbox"/> 21-100 <input type="checkbox"/> 101-250 <input type="checkbox"/> 251-500 <input checked="" type="checkbox"/> 501 and higher				<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>14. Customer Role</b> (Proposed or Actual) – as it relates to the Regulated Entity listed on this form. Please check one of the following					
<input type="checkbox"/> Owner <input type="checkbox"/> Operator <input checked="" type="checkbox"/> Owner & Operator <input type="checkbox"/> Other:					
<input type="checkbox"/> Occupational Licensee <input type="checkbox"/> Responsible Party <input type="checkbox"/> VCP/BSA Applicant					
<b>15. Mailing Address:</b>	StarPak				
	9690 W Wingfoot Rd				
	<b>City</b>	Houston	<b>State</b>	TX	<b>ZIP</b> 77041 <b>ZIP + 4</b> 9037
<b>16. Country Mailing Information</b> (if outside USA)				<b>17. E-Mail Address</b> (if applicable)	
<b>18. Telephone Number</b>		<b>19. Extension or Code</b>		<b>20. Fax Number</b> (if applicable)	



### SECTION III: Regulated Entity Information

<b>21. General Regulated Entity Information</b> <i>(If 'New Regulated Entity' is selected, a new permit application is also required.)</i>								
<input type="checkbox"/> New Regulated Entity <input type="checkbox"/> Update to Regulated Entity Name <input checked="" type="checkbox"/> Update to Regulated Entity Information								
<i>The Regulated Entity Name submitted may be updated, in order to meet TCEQ Core Data Standards (removal of organizational endings such as Inc, LP, or LLC).</i>								
<b>22. Regulated Entity Name</b> <i>(Enter name of the site where the regulated action is taking place.)</i>								
StarPak								
<b>23. Street Address of the Regulated Entity:</b>  <i>(No PO Boxes)</i>	StarPak							
	9690 W Wingfoot Rd							
	<b>City</b>	Houston	<b>State</b>	TX	<b>ZIP</b>	77041	<b>ZIP + 4</b>	9037
<b>24. County</b>	Harris							

If no Street Address is provided, fields 25-28 are required.

<b>25. Description to Physical Location:</b>										
<b>26. Nearest City</b>					<b>State</b>				<b>Nearest ZIP Code</b>	
<i>Latitude/Longitude are required and may be added/updated to meet TCEQ Core Data Standards. (Geocoding of the Physical Address may be used to supply coordinates where none have been provided or to gain accuracy).</i>										
<b>27. Latitude (N) In Decimal:</b>						<b>28. Longitude (W) In Decimal:</b>				
Degrees	Minutes		Seconds		Degrees	Minutes		Seconds		
29	50		28		95	31		53		
<b>29. Primary SIC Code</b> (4 digits)		<b>30. Secondary SIC Code</b> (4 digits)		<b>31. Primary NAICS Code</b> (5 or 6 digits)			<b>32. Secondary NAICS Code</b> (5 or 6 digits)			
2671		3081		326112						
<b>33. What is the Primary Business of this entity?</b> <i>(Do not repeat the SIC or NAICS description.)</i>										
StarPak has ongoing printing operations.										
<b>34. Mailing Address:</b>	StarPak									
	9690 W Wingfoot Rd									
	<b>City</b>	Houston	<b>State</b>	TX	<b>ZIP</b>	77041	<b>ZIP + 4</b>	9307		
<b>35. E-Mail Address:</b>										
<b>36. Telephone Number</b>			<b>37. Extension or Code</b>			<b>38. Fax Number</b> <i>(if applicable)</i>				
( 713 ) 329-9183						( ) -				

**39. TCEQ Programs and ID Numbers** Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form. See the Core Data Form instructions for additional guidance.

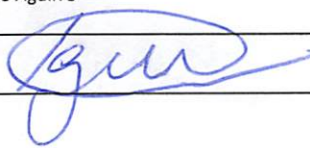
<input type="checkbox"/> Dam Safety	<input type="checkbox"/> Districts	<input type="checkbox"/> Edwards Aquifer	<input type="checkbox"/> Emissions Inventory Air	<input type="checkbox"/> Industrial Hazardous Waste
<input type="checkbox"/> Municipal Solid Waste	<input checked="" type="checkbox"/> New Source Review Air	<input type="checkbox"/> OSSF	<input type="checkbox"/> Petroleum Storage Tank	<input type="checkbox"/> PWS
	108176			
<input type="checkbox"/> Sludge	<input type="checkbox"/> Storm Water	<input checked="" type="checkbox"/> Title V Air	<input type="checkbox"/> Tires	<input type="checkbox"/> Used Oil
		TBD		
<input type="checkbox"/> Voluntary Cleanup	<input type="checkbox"/> Wastewater	<input type="checkbox"/> Wastewater Agriculture	<input type="checkbox"/> Water Rights	<input type="checkbox"/> Other:

#### **SECTION IV: Preparer Information**

40. Name:	William Garris		41. Title:	Project Manager
42. Telephone Number	43. Ext./Code	44. Fax Number	45. E-Mail Address	
( 713 ) 460-1482		( ) -	bgarris@fivestarmangement.com	

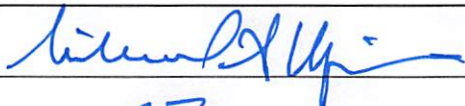
#### **SECTION V: Authorized Signature**

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 6 and/or as required for the updates to the ID numbers identified in field 39.

Company:	StarPak LLC	Job Title:	Plant Engineer, StarPak LLC
Name (In Print):	Ignacio Aguirre	Phone:	( 713 ) 460- 1482
Signature:		Date:	4/4/2023

**Form OP-CRO1**  
**Certification by Responsible Official**  
**Federal Operating Permit Program**

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. Identifying Information		
RN: 102886819	CN: 605931682	Account No.: HGA026Z
Permit No.: TBA	Project No.: TBA	
Area Name: StarPak	Company Name: StarPak LLC	
II. Certification Type <i>(Please mark the appropriate box)</i>		
<input checked="" type="checkbox"/> Responsible Official <span style="margin-left: 100px;"><input type="checkbox"/> Duly Authorized Representative</span>		
III. Submittal Type <i>(Please mark the appropriate box) (Only one response can be accepted per form)</i>		
<input checked="" type="checkbox"/> SOP/TOP Initial Permit Application <span style="margin-left: 50px;"><input type="checkbox"/> Update to Permit Application</span>		
<input type="checkbox"/> GOP Initial Permit Application <span style="margin-left: 50px;"><input type="checkbox"/> Permit Revision, Renewal, or Reopening</span>		
<input type="checkbox"/> Other: _____		
IV. Certification of Truth		
<p><b>This certification does not extend to information which is designated by the TCEQ as information for reference only.</b></p> <p>I, <u>Michael S. Ukropina</u> certify that I am the <u>RO</u>  <i>(Certifier Name printed or typed)</i> <span style="float: right;"><i>(RO or DAR)</i></span></p> <p>and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:</p> <p><i>Note: Enter Either a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i></p> <p>Time Period: From _____ to _____  <span style="margin-left: 150px;"><i>Start Date</i></span> <span style="margin-left: 150px;"><i>End Date</i></span></p> <p>Specific Dates: <u>April 4, 2023</u> _____  <span style="margin-left: 50px;"><i>Date 1</i></span> <span style="margin-left: 50px;"><i>Date 2</i></span> <span style="margin-left: 50px;"><i>Date 3</i></span> <span style="margin-left: 50px;"><i>Date 4</i></span> <span style="margin-left: 50px;"><i>Date 5</i></span> <span style="margin-left: 50px;"><i>Date 6</i></span></p>		
<p>Signature: <u></u> Signature Date: <u>April 4, 2023</u></p> <p>Title: <u>CFO</u></p>		

**Federal Operating Permit Program  
Site Information Summary  
Form OP-1 (Page 1)  
Texas Commission on Environmental Quality**

Please print or type all information. Direct any questions regarding this application form to the Air Permits Division at (512) 239-1250 or to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division (MC 163), P.O. Box 13087, Austin, Texas 78711-3087.

<b>I. Company Identifying Information</b>
A. Company Name: StarPak LLC
B. Customer Reference Number (CN): CN605931682
C. Submittal Date (mm/dd/yyyy): 04/04/2023
<b>II. Site Information</b>
A. Site Name: StarPak
B. Regulated Entity Reference Number (RN): RN102886819
C. Indicate affected state(s) required to review permit application: <i>(Check the appropriate box[es].)</i>
<input type="checkbox"/> AR <input type="checkbox"/> CO <input type="checkbox"/> KS <input type="checkbox"/> LA <input type="checkbox"/> NM <input type="checkbox"/> OK <input checked="" type="checkbox"/> N/A
D. Indicate all pollutants for which the site is a major source based on the site's potential to emit: <i>(Check the appropriate box[es].)</i>
<input checked="" type="checkbox"/> VOC <input type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> CO <input type="checkbox"/> Pb <input type="checkbox"/> HAPS
Other:
E. Is the site a non-major source subject to the Federal Operating Permit Program? <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
F. Is the site within a local program area jurisdiction? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>
G. Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
H. Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:
<b>III. Permit Type</b>
A. Type of Permit Requested: <i>(Select only one response )</i>
<input checked="" type="checkbox"/> Site Operating Permit (SOP) <input type="checkbox"/> Temporary Operating Permit (TOP) <input type="checkbox"/> General Operating Permit (GOP)

**Federal Operating Permit Program  
Site Information Summary  
Form OP-1 (Page 2)  
Texas Commission on Environmental Quality**

<b>IV. Initial Application Information</b> <i>(Complete for Initial Issuance Applications Only.)</i>
<b>A.</b> Is this submittal an abbreviated or a full application? <span style="float: right;"><input type="checkbox"/> Abbreviated <input checked="" type="checkbox"/> Full</span>
<b>B.</b> If this is a full application, is the submittal a follow-up to an abbreviated application? <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
<b>C.</b> If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit? <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
<b>D.</b> Has an electronic copy of this application been submitted (or is being submitted) to EPA? (Refer to the form instructions for additional information.) <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>
<b>V. Confidential Information</b>
<b>A.</b> Is confidential information submitted in conjunction with this application? <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
<b>VI. Responsible Official (RO) Identifying Information</b>
RO Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
RO Full Name: Michael S. Ukropina
RO Title: Chief Executive Officer, StarPak LLC
Employer Name: StarPak LLC
Mailing Address: 9690 W Wingfoot Rd
City: Houston
State: TX
ZIP Code: 77041
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 513-377-1725
Fax No.:
Email: mukropina@fivestarmanagement.com

**Federal Operating Permit Program  
Site Information Summary  
Form OP-1 (Page 3)  
Texas Commission on Environmental Quality**

<b>VII. Technical Contact Identifying Information</b> <i>(Complete if different from RO.)</i>
Technical Contact Name Prefix: <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Technical Contact Full Name: William Garris
Technical Contact Title: Project Manager
Employer Name: StarPak LLC
Mailing Address: 9690 W Wingfoot Rd
City: Houston
State: TX
ZIP Code: 77041
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 713-460-1482
Fax No.:
Email: bgarris@fivestarmanagement.com
<b>VIII. Reference Only Requirements</b> <i>(For reference only.)</i>
<b>A.</b> State Senator: Sen. John Whitmire, Senate District 15
<b>B.</b> State Representative: Rep. Lacey Hull, House District 138
<b>C.</b> Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A</span>
<b>D.</b> Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>
<b>E.</b> Indicate the alternate language(s) in which public notice is required: Spanish

**Federal Operating Permit Program  
Site Information Summary  
Form OP-1 (Page 4)  
Texas Commission on Environmental Quality**

<b>IX. Off-Site Permit Request</b> <i>(Optional for applicants requesting to hold the FOP and records at an off-site location.)</i>
<b>A.</b> Office/Facility Name:
<b>B.</b> Physical Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
<b>C.</b> Physical Location:
<b>D.</b> Contact Name Prefix: ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Contact Full Name:
<b>E.</b> Telephone No.:
<b>X. Application Area Information</b>
<b>A.</b> Area Name: StarPak
<b>B.</b> Physical Address: 9690 W Wingfoot Rd
City: Houston
State: TX
ZIP Code: 77041
<b>C.</b> Physical Location:
<b>D.</b> Nearest City:
<b>E.</b> State:
<b>F.</b> ZIP Code:

**Federal Operating Permit Program  
Site Information Summary  
Form OP-1 (Page 5)  
Texas Commission on Environmental Quality**

<b>X. Application Area Information</b> <i>(continued)</i>
<b>G.</b> Latitude (nearest second): 29°50'28" N
<b>H.</b> Longitude (nearest second): 95°31'53" W
<b>I.</b> Are there any emission units that were not in compliance with the applicable requirements identified in the application at the time of application submittal? <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
<b>J.</b> Indicate the estimated number of emission units in the application area: <span style="float: right;">13</span>
<b>K.</b> Are there any emission units in the application area subject to the Acid Rain Program? <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
<b>XI. Public Notice</b> <i>(Complete this section for SOP Applications and Acid Rain Permit Applications only.)</i>
<b>A.</b> Name of a public place to view application and draft permit: Hillendahl Neighborhood Library
<b>B.</b> Physical Address: 2436 Gessner Rd
City: Houston
ZIP Code: 77041
<b>C.</b> Contact Person (Someone who will answer questions from the public during the public notice period):
Contact Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.):
Contact Person Full Name: William Garris
Contact Mailing Address: 9690 W Wingfoot Rd
City: Houston
State: TX
ZIP Code: 77041
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 713-460-1482



**Federal Operating Permit Program  
Site Information Summary  
Form OP-1 (Page 6)  
Texas Commission on Environmental Quality**

<b>XII. Delinquent Fees and Penalties</b>
<b>Notice:</b> This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of Attorney General on behalf of the TCEQ are paid in accordance with the "Delinquent Fee and Penalty Protocol."
<b>Complete Sections XIII and XIV for Acid Rain Permit and CSAPR applications only. Please include a copy of the Certificate of Representation submitted to EPA.</b>
<b>XIII. Designated Representative (DR) Identifying Information</b>
DR Name Prefix: ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
DR Full Name:
DR Title:
Employer Name:
Mailing Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.:
Fax No.:
Email:

**Federal Operating Permit Program  
Site Information Summary  
Form OP-1 (Page 7)  
Texas Commission on Environmental Quality**

**Complete Sections XIII and XIV for Acid Rain Permit and CSAPR applications only. Please include a copy of the Certificate of Representation submitted to EPA.**

**XIV. Alternate Designated Representative (ADR) Identifying Information**

ADR Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)

ADR Full Name:

ADR Title:

Employer Name:

Mailing Address:

City:

State:

ZIP Code:

Territory:

Country:

Foreign Postal Code:

Internal Mail Code:

Telephone No.:

Fax No.:

Email:

**Texas Commission on Environmental Quality  
Federal Operating Permit Program  
Individual Unit Summary  
Form OP-SUM  
Table 1**

Date	Permit No.	Regulated Entity No.
4/4/2023	TBA	RN102886819

Unit/Process ID No.	Applicable Form	Unit Name/ Description	CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title 1	Group ID No.
B-1	OP-REQ2	Air Handler Freeze Protection Boiler		106.183/9/4/2000		
DIESEL1	OP-REQ2	Diesel Storage Tank for EFP-1		106.472/9/4/2000		
DIESEL2	OP-REQ2	Diesel Storage Tank for WFP-1		106.472/9/4/2000		
EFP-1	OP-UA2	East Fire Water Pump Emergency Generator		106.511/9/4/2000		
GEN-1	OP-REQ2	Natural Gas Emergency Generator		106.511/9/4/2000		
INK-ROOM	OP-UA15	Ink Room		108176		
OX-1	OP-REQ2	60,000 SCFM Oxidizer		108176		GRP-OX
OX-2	OP-REQ2	30,000 SCFM Oxidizer		108176		GRP-OX
OX-3	OP-REQ2	55,000 SCFM Oxidizer		108176		GRP-OX
PRNTDRYR1	OP-REQ2	Print Dryer 1		108176		GRP-DRYR
PRNTDRYR2	OP-REQ2	Print Dryer 2		108176		GRP-DRYR
PRNTDRYR3	OP-REQ2	Print Dryer 3		108176		GRP-DRYR
PRNTDRYR5	OP-REQ2	Print Dryer 5		108176		GRP-DRYR
PRNTDRYR6	OP-REQ2	Print Dryer 6		108176		GRP-DRYR
PRNTDRYR7	OP-REQ2	Print Dryer 7		108176		GRP-DRYR
PRNTDRYR8	OP-REQ2	Print Dryer 8		108176		GRP-DRYR
PRNTDRYR9	OP-REQ2	Print Dryer 9		108176		GRP-DRYR
PRNTDRYR10	OP-REQ2	Print Dryer 10		108176		GRP-DRYR
PRNTDRYR11	OP-REQ2	Print Dryer 11		108176		GRP-DRYR
PRNTDRYR12	OP-REQ2	Print Dryer 12		108176		GRP-DRYR
PRNTDRYR13	OP-REQ2	Print Dryer 13		108176		GRP-DRYR
PRNTDRYR14	OP-REQ2	Print Dryer 14		108176		GRP-DRYR
PRNTDRYR15	OP-REQ2	Print Dryer 15		108176		GRP-DRYR
PRNTPRSS1	OP-UA22	Printing Press 1		108176		GRP-DRYR
PRNTPRSS2	OP-UA22	Printing Press 2		108176		GRP-PRNT
PRNTPRSS3	OP-UA22	Printing Press 3		108176		GRP-PRNT

**Texas Commission on Environmental Quality  
Federal Operating Permit Program  
Individual Unit Summary  
Form OP-SUM  
Table 1**

Date	Permit No.	Regulated Entity No.
4/4/2023	TBA	RN102886819

Unit/Process ID No.	Applicable Form	Unit Name/ Description	CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title 1	Group ID No.
PRNTPRSS5	OP-UA22	Printing Press 5		108176		GRP-PRNT
PRNTPRSS6	OP-UA22	Printing Press 6		108176		GRP-PRNT
PRNTPRSS7	OP-UA22	Printing Press 7		108176		GRP-PRNT
PRNTPRSS8	OP-UA22	Printing Press 8		108176		GRP-PRNT
PRNTPRSS9	OP-UA22	Printing Press 9		108176		GRP-PRNT
PRNTPRSS10	OP-UA22	Printing Press 10		108176		GRP-PRNT
PRNTPRSS11	OP-UA22	Printing Press 11		108176		GRP-PRNT
PRNTPRSS12	OP-UA22	Printing Press 12		108176		GRP-PRNT
PRNTPRSS13	OP-UA22	Printing Press 13		108176		GRP-PRNT
PRNTPRSS14	OP-UA22	Printing Press 14		108176		GRP-PRNT
PRNTPRSS15	OP-UA22	Printing Press 15		108176		GRP-PRNT
SOL-CLNR	OP-UA15	Solvent Cleaner		108176		
T-1	OP-UA3	10,000 gal Solvent Storage Tank		108176		
T-2	OP-UA3	14,500 gal Solvent Storage Tank		108176		
T-3	OP-UA3	14,500 gal Solvent Storage Tank		108176		
T-4	OP-UA3	14,500 gal Solvent Storage Tank		108176		
UNLOADER1	OP-UA4	Tank Truck Unloader (0.5- psia)		52466		
UNLOADER2	OP-UA4	Tank Truck Unloader (0.5+ psia)		106.473/09/04/2000		
WFP-1	OP-REQ2	West Fire Water Pump Emergency Generator		106.511/9/4/2000		

TCEQ 10007 (APDG 5837v9, Revised 05/20) OP-SUM

This form is for use by facilities subject to air quality permit requirements and may be revised periodically.

**Texas Commission on Environmental Quality**  
**Form OP-ACPS**  
**Application Compliance Plan and Schedule**

<b>Date:</b> 04/04/2023	<b>Regulated Entity No.:</b> RN102886819	<b>Permit No.:</b>
<b>Company Name:</b> StarPak LLC		<b>Area Name:</b> StarPak

- Part 1 of this form must be submitted with all initial FOP applications and renewal applications.
- The Responsible Official must use Form OP-CRO1 (Certification by Responsible Official) to certify information contained in this form in accordance with 30 TAC § 122.132(d)(8).

**Part 1**

<b>A. Compliance Plan — Future Activity Committal Statement</b>	
<p>The <i>Responsible Official</i> commits, utilizing reasonable effort, to the following:          As the responsible official it is my intent that all emission units shall continue to be in compliance with all applicable requirements they are currently in compliance with, and all emission units shall be in compliance by the compliance dates with any applicable requirements that become effective during the permit term.</p>	
<b>B. Compliance Certification - Statement for Units in Compliance*</b> (Indicate response by entering an "X" in the appropriate column)	
1. With the exception of those emission units listed in the Compliance Schedule section of this form (Part 2, below), and based, at minimum, on the compliance method specified in the associated applicable requirements, are all emission units addressed in this application in compliance with all their respective applicable requirements as identified in this application?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. If the response to Item B.2, above, is "Yes," indicate the total number of Part 2 attachments included in this submittal. <i>(For reference only)</i>	0
<p>* For Site Operating Permits (SOPs), the complete application should be consulted for applicable requirements and their corresponding emission units when assessing compliance status. For General Operating Permits (GOPs), the application documentation, particularly Form OP-REQ1 should be consulted as well as the requirements contained in the appropriate General Permits portion of 30 TAC Chapter 122.</p> <p>Compliance should be assessed based, at a minimum, on the required monitoring, testing, record keeping, and/or reporting requirements, as appropriate, associated with the applicable requirement in question.</p>	

# Appendix B

## **TCEQ Potentially Applicable Requirements Forms**

**Texas Commission on Environmental Quality**  
**Application Area-Wide Applicability Determinations and General Information**  
**Form OP-REQ1**  
**Federal Operating Permit Program**

Date:	04/04/2023
Permit No.:	
RN No.:	102886819

*For SOP applications, answer ALL questions unless otherwise directed.*

◆ *For GOP applications, answer ONLY these questions unless otherwise directed.*

<b>Form OP-REQ1: Page 1</b>		
<b>I. Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter</b>		
<b>A. Visible Emissions</b>		
◆	1. The application area includes stationary vents constructed on or before January 31, 1972.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	2. The application area includes stationary vents constructed after January 31, 1972. <i>If the responses to Questions I.A.1 and I.A.2 are both "NO," go to Question I.A.6.</i> <i>If the response to Question I.A.1 is "NO" and the response to Question I.A.2 is "YES," go to Question I.A.4.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆	3. The application area is opting to comply with the requirements for stationary vents constructed after January 31, 1972 for vents in the application area constructed on or before January 31, 1972.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	4. All stationary vents are addressed on a unit specific basis.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	5. Test Method 9 (40 CFR Part 60, Appendix A, Method 9 - Visual Determination of the Opacity of Emissions from Stationary Sources) is used to determine opacity of emissions in the application area.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆	6. The application area includes structures subject to 30 TAC § 111.111(a)(7)(A).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	7. The application area includes sources, other than those specified in 30 TAC § 111.111(a)(1), (4), or (7), subject to 30 TAC § 111.111(a)(8)(A).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	8. Emissions from units in the application area include contributions from uncombined water.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	9. The application area is located in the City of El Paso, including Fort Bliss Military Reservation, and includes solid fuel heating devices subject to 30 TAC § 111.111(c).	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A

**Texas Commission on Environmental Quality**  
**Application Area-Wide Applicability Determinations and General Information**  
**Form OP-REQ1**  
**Federal Operating Permit Program**

Date:	04/04/2023
Permit No.:	
RN No.:	102886819

*For SOP applications, answer ALL questions unless otherwise directed.*

◆ *For GOP applications, answer ONLY these questions unless otherwise directed.*

<b>Form OP-REQ1: Page 2</b>	
<b>I. Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter (continued)</b>	
<b>B. Materials Handling, Construction, Roads, Streets, Alleys, and Parking Lots</b>	
1. Items a - d determines applicability of any of these requirements based on geographical location.	
◆ a. The application area is located within the City of El Paso.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆ b. The application area is located within the Fort Bliss Military Reservation, except areas specified in 30 TAC § 111.141.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆ c. The application area is located in the portion of Harris County inside the loop formed by Beltway 8.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆ d. The application area is located in the area of Nueces County outlined in Group II state implementation plan (SIP) for inhalable particulate matter adopted by the TCEQ on May 13, 1988.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<i>If there is any "YES" response to Questions I.B.1.a - d, answers Questions I.B.2.a - d. If all responses to Questions I.B.1.a-d are "NO," go to Section I.C.</i>	
2. Items a - d determine the specific applicability of these requirements.	
◆ a. The application area is subject to 30 TAC § 111.143.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆ b. The application area is subject to 30 TAC § 111.145.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆ c. The application area is subject to 30 TAC § 111.147.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆ d. The application area is subject to 30 TAC § 111.149.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
<b>C. Emissions Limits on Nonagricultural Processes</b>	
◆ 1. The application area includes a nonagricultural process subject to 30 TAC § 111.151.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area includes a vent from a nonagricultural process that is subject to additional monitoring requirements. <i>If the response to Question I.C.2 is "NO," go to Question I.C.4.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. All vents from nonagricultural process in the application area are subject to additional monitoring requirements.	<input type="checkbox"/> YES <input type="checkbox"/> NO



**Texas Commission on Environmental Quality**  
**Application Area-Wide Applicability Determinations and General Information**  
**Form OP-REQ1**  
**Federal Operating Permit Program**

Date:	04/04/2023
Permit No.:	
RN No.:	102886819

*For SOP applications, answer ALL questions unless otherwise directed.*

◆ *For GOP applications, answer ONLY these questions unless otherwise directed.*

<b>Form OP-REQ1: Page 3</b>	
<b>I. Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter (continued)</b>	
<b>C. Emissions Limits on Nonagricultural Processes (continued)</b>	
4. The application area includes oil or gas fuel-fired steam generators subject to 30 TAC §§ 111.153(a) and 111.153(c).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
5. The application area includes oil or gas fuel-fired steam generators that are subject to additional monitoring requirements. <i>If the response to Question I.C.5 is "NO," go to Question I.C.7.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
6. All oil or gas fuel-fired steam generators in the application area are subject to additional monitoring requirements.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes solid fossil fuel-fired steam generators subject to 30 TAC §§ 111.153(a) and 111.153(b).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
8. The application area includes solid fossil fuel-fired steam generators that are subject to additional monitoring requirements. <i>If the response to Question I.C.8 is "NO," go to Section I.D.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
9. All solid fossil fuel-fired steam generators in the application area are subject to additional monitoring requirements.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>D. Emissions Limits on Agricultural Processes</b>	
1. The application area includes agricultural processes subject to 30 TAC § 111.171.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>E. Outdoor Burning</b>	
◆ 1. Outdoor burning is conducted in the application area. <i>If the response to Question I.E.1 is "NO," go to Section II.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆ 2. Fire training is conducted in the application area and subject to the exception provided in 30 TAC § 111.205.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆ 3. Fires for recreation, ceremony, cooking, and warmth are used in the application area and subject to the exception provided in 30 TAC § 111.207.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆ 4. Disposal fires are used in the application area and subject to the exception provided in 30 TAC § 111.209.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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<b>I. Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter (continued)</b>	
<b>E. Outdoor Burning (continued)</b>	
◆	5. Prescribed burning is used in the application area and subject to the exception provided in 30 TAC § 111.211. <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
◆	6. Hydrocarbon burning is used in the application area and subject to the exception provided in 30 TAC § 111.213. <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
◆	7. The application area has received the TCEQ Executive Director approval of otherwise prohibited outdoor burning according to 30 TAC § 111.215. <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
<b>II. Title 30 TAC Chapter 112 - Control of Air Pollution from Sulfur Compounds</b>	
<b>A. Temporary Fuel Shortage Plan Requirements</b>	
	1. The application area includes units that are potentially subject to the temporary fuel shortage plan requirements of 30 TAC §§ 112.15 - 112.18. <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
<b>III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds</b>	
<b>A. Applicability</b>	
◆	1. The application area is located in the Houston/Galveston/Brazoria area, Beaumont/Port Arthur area, Dallas/Fort Worth area, El Paso area, or a covered attainment county as defined by 30 TAC § 115.10. <i>See instructions for inclusive counties. If the response to Question III.A.1 is "NO," go to Section IV.</i> <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>
<b>B. Storage of Volatile Organic Compounds</b>	
◆	1. The application area includes storage tanks, reservoirs, or other containers capable of maintaining working pressure sufficient at all times to prevent any VOC vapor or gas loss to the atmosphere. <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>

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<b>III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)</b>	
<b>C. Industrial Wastewater</b>	
1. The application area includes affected VOC wastewater streams of an affected source category, as defined in 30 TAC § 115.140. <i>If the response to Question III.C.1 is "NO" or "N/A," go to Section III.D.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area is located at a petroleum refinery in the Beaumont/Port Arthur or Houston/Galveston/Brazoria area. <i>If the response to Question III.C.2 is "YES" and the refinery is in the Beaumont/Port Arthur area, go to Section III.D.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area is complying with the provisions of 40 CFR Part 63, Subpart G, as an alternative to complying with this division (relating to Industrial Wastewater). <i>If the response to Question III.C.3 is "YES," go to Section III.D.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
4. The application area is located at a plant with an annual VOC loading in wastewater, as determined in accordance with 30 TAC § 115.148, less than or equal to 10 Mg (11.03 tons). <i>If the response to Question III.C.4 is "YES," go to Section III.D.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes wastewater drains, junction boxes, lift stations, or weirs that are subject to the control requirements of 30 TAC § 115.142(1).	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes wastewater drains, junction boxes, lift stations, or weirs that handle streams chosen for exemption under 30 TAC § 115.147(2).	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes wastewater drains, junction boxes, lift stations, or weirs that have an executive director approved exemption under 30 TAC § 115.147(4).	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>D. Loading and Unloading of VOCs</b>	
◆ 1. The application area includes VOC loading operations.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆ 2. The application area includes VOC transport vessel unloading operations. <i>For GOP applications, if the responses to Questions III.D.1 - D.2 are "NO," go to Section III.E.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

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<b>III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)</b>	
<b>D. Loading and Unloading of VOCs (continued)</b>	
◆ 3. Transfer operations at motor vehicle fuel dispensing facilities are the only VOC transfer operations conducted in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>E. Filling of Gasoline Storage Vessels (Stage I) for Motor Vehicle Fuel Dispensing Facilities</b>	
◆ 1. The application area includes one or more motor vehicle fuel dispensing facilities and gasoline is transferred from a tank-truck tank into a stationary storage container. <i>If the response to Question III.E.1 is "NO," go to Section III.F.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆ 2. Transfers to stationary storage containers used exclusively for the fueling of agricultural implements are the only transfer operations conducted at facilities in the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 3. All transfers at facilities in the application area are made into stationary storage containers with internal floating roofs, external floating roofs, or their equivalent. <i>If the response to Question III.E.2 and/or E.3 is "YES," go to Section III.F.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 4. The application area is located in a covered attainment county as defined in 30 TAC § 115.10. <i>If the response to Question III.E.4 is "NO," go to Question III.E.9.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 5. Stationary gasoline storage containers with a nominal capacity less than or equal to 1,000 gallons are located at the facility.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 6. Stationary gasoline storage containers with a nominal capacity greater than 1,000 gallons are located at the facility.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 7. At facilities located in covered attainment counties other than Bastrop, Bexar, Caldwell, Comal, Guadalupe, Hays, Travis, Williamson, or Wilson County, transfers are made to stationary storage tanks greater than 1000 gallons located at a facility which has dispensed less than 100,000 gallons of gasoline in a calendar month after October 31, 2014. <i>If the response to Question III.E.7 is "YES," go to Section III.F.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 7</b>		
<b>III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)</b>		
<b>E. Filling of Gasoline Storage Vessels (Stage I) for Motor Vehicle Fuel Dispensing Facilities (continued)</b>		
◆	8. At facilities located in Bastrop, Bexar, Caldwell, Comal, Guadalupe, Hays, Travis, Williamson, or Wilson County, transfers are made to stationary storage tanks greater than 1000 gallons located at a facility which has dispensed no more than 25,000 gallons of gasoline in a calendar month after December 31, 2004. <i>If the response to Question III.E.8 is "YES," go to Section III.F.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	9. Transfers are made to stationary storage tanks located at a motor vehicle fuel dispensing facility which has dispensed no more than 10,000 gallons of gasoline in any calendar month after January 1, 1991 and for which construction began prior to November 15, 1992.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	10. Transfers are made to stationary storage tanks located at a motor vehicle fuel dispensing facility which has dispensed more than 10,000 gallons of gasoline in any calendar month after January 1, 1991 and for which construction began prior to November 15, 1992.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	11. Transfers are made to stationary storage tanks located at a motor vehicle fuel dispensing facility which commenced construction on or after November 15, 1992.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	12. At facilities located in Ellis, Johnson, Kaufman, Parker, or Rockwall County, transfers are made to stationary storage tanks located at a facility which has dispensed at least 10,000 gallons of gasoline but less than 125,000 gallons of gasoline in a calendar month after April 30, 2005.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>F. Control of VOC Leaks from Transport Vessels (Complete this section for GOP applications for GOPs 511, 512, 513 and 514 only)</b>		
◆	1. Tank-truck tanks are filled with, or emptied of, gasoline at a facility that is subject to 30 TAC § 115.214(a)(1)(C) or 115.224(2) within the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A

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<b>Form OP-REQ1: Page 8</b>	
<b>III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)</b>	
<b>F. Control of VOC Leaks from Transport Vessels (Complete this section for GOP applications for GOPs 511, 512, 513 and 514 only) (continued)</b>	
◆ 2. Tank-truck tanks are filled with non-gasoline VOCs having a TVP greater than or equal to 0.5 psia under actual storage conditions at a facility subject to 30 TAC § 115.214(a)(1)(C) within the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
◆ 3. Tank-truck tanks are filled with, or emptied of, gasoline at a facility that is subject to 30 TAC § 115.214(b)(1)(C) or 115.224(2) within the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
<b>G. Control of Vehicle Refueling Emissions (Stage II) at Motor Vehicle Fuel Dispensing Facilities</b>	
◆ 1. The application area includes one or more motor vehicle fuel dispensing facilities and gasoline is transferred from a stationary storage container into motor vehicle fuel tanks. <i>If the response to Question III.G.1 is "NO" or "N/A," go to Section III.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
◆ 2. The application area includes facilities that began construction on or after November 15, 1992 and prior to May 16, 2012.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 3. The application area includes facilities that began construction prior to November 15, 1992. <i>If the responses to Questions III.G.2 and Question III.G.3 are both "NO," go to Section III.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 4. The application area includes only facilities that have a monthly throughput of less than 10,000 gallons of gasoline.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 5. The decommissioning of all Stage II vapor recovery control equipment located in the application area has been completed and the decommissioning notice submitted.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A

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<b>Form OP-REQ1: Page 9</b>	
<b>III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)</b>	
<b>H. Control Of Reid Vapor Pressure (RVP) of Gasoline</b>	
◆ 1. The application area includes stationary tanks, reservoirs, or other containers holding gasoline that may ultimately be used in a motor vehicle in El Paso County. <i>If the response to Question III.H.1 is "NO" or "N/A," go to Section III.I.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
◆ 2. The application area includes stationary tanks, reservoirs, or other containers holding gasoline that will be used exclusively for the fueling of agricultural implements.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 3. The application area includes a motor vehicle fuel dispensing facility.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 4. The application area includes stationary tanks, reservoirs, or other containers holding gasoline and having a nominal capacity of 500 gallons or less.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>I. Process Unit Turnaround and Vacuum-Producing Systems in Petroleum Refineries</b>	
1. The application area is located at a petroleum refinery.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>J. Surface Coating Processes (Complete this section for GOP applications only.)</b>	
◆ 1. Surface coating operations (other than those performed on equipment located on-site and in-place) that meet the exemption specified in 30 TAC § 115.427(3)(A) or 115.427(7) are performed in the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A

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<b>Form OP-REQ1: Page 10</b>	
<b>III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)</b>	
<b>K. Cutback Asphalt</b>	
1. Conventional cutback asphalt containing VOC solvents for the paving of roadways, driveways, or parking lots, is used or specified for use in the application area by a state, municipal, or county agency. <i>If the response to Question III.K.1 is "N/A," go to Section III.L.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
2. The use, application, sale, or offering for sale of conventional cutback asphalt containing VOC solvents for the paving of roadways, driveways, or parking lots occurs in the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
3. Asphalt emulsion is used or produced within the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area is using an alternate control requirement as specified in 30 TAC § 115.513. <i>If the response to Question III.K.4 is "NO," go to Section III.L.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area uses, applies, sells, or offers for sale asphalt concrete, made with cutback asphalt, that meets the exemption specified in 30 TAC § 115.517(1).	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area uses, applies, sells, or offers for sale cutback asphalt that is used solely as a penetrating prime coat.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The applicant using cutback asphalt is a state, municipal, or county agency.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>L. Degassing of Storage Tanks, Transport Vessels and Marine Vessels</b>	
◆ 1. The application area includes degassing operations for stationary, marine, and/or transport vessels. <i>If the response to Question III.L.1 is "NO" or "N/A," go to Section III.M.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
◆ 2. Degassing of only ocean-going, self-propelled VOC marine vessels is performed in the application area. <i>If the response to Question III.L.2 is "YES," go to Section III.M.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A



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<b>III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)</b>		
<b>L. Degassing of Storage Tanks, Transport Vessels and Marine Vessels (continued)</b>		
◆	3. Degassing of stationary VOC storage vessels with a nominal storage capacity of 1,000,000 gallons or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
◆	4. Degassing of stationary VOC storage vessels with a nominal storage capacity of 250,000 gallons or more, or a nominal storage capacity of 75,000 gallons and storing materials with a true vapor pressure greater than 2.6 psia, and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
◆	5. Degassing of VOC transport vessels with a nominal storage capacity of 8,000 gallons or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	6. Degassing of VOC marine vessels with a nominal storage capacity of 10,000 barrels (420,000 gallons) or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
◆	7. Degassing of VOC marine vessels with a nominal storage capacity of 10,000 barrels (420,000 gallons) and a vapor space partial pressure $\geq$ 0.5 psia that have sustained damage as specified in 30 TAC § 115.547(5) is performed in the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
<b>M. Petroleum Dry Cleaning Systems</b>		
	1. The application area contains one or more petroleum dry cleaning facilities that use petroleum based solvents.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A

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<b>III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)</b>	
<b>N. Vent Gas Control (Highly-reactive volatile organic compounds (HRVOC))</b>	
1. The application area includes one or more vent gas streams containing HRVOC.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area includes one or more flares that emit or have the potential to emit HRVOC. <i>If the responses to Questions III.N.1 and III.N.2 are both "NO" or "N/A," go to Section III.O. If the response to Question III.N.1 is "YES," continue with Question III.N.3.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
3. All vent streams in the application area that are routed to a flare contain less than 5.0% HRVOC by weight at all times.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
4. All vent streams in the application area that are not routed to a flare contain less than 100 ppmv HRVOC at all times. <i>If the responses to Questions III.N.3 and III.N.4 are both "NO," go to Section III.O.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area contains pressure relief valves that are not controlled by a flare.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
6. The application area has at least one vent stream which has no potential to emit HRVOC.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area has vent streams from a source described in 30 TAC § 115.727(c)(3)(A) - (H).	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
<b>O. Cooling Tower Heat Exchange Systems (HRVOC)</b>	
1. The application area includes one or more cooling tower heat exchange systems that emit or have the potential to emit HRVOC.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A

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**IV. Title 30 TAC Chapter 117 - Control of Air Pollution from Nitrogen Compounds**

**A. Applicability**

◆	1. The application area is located in the Houston/Galveston/Brazoria, Beaumont/Port Arthur, or Dallas/Fort Worth Eight-Hour area. <i>For SOP applications, if the response to Question IV.A.1 is "YES," complete Sections IV.B - IV.F and IV.H.</i> <i>For GOP applications for GOPs 511, 512, 513, or 514, if the response to Question IV.A.1 is "YES," go to Section IV.F.</i> <i>For GOP applications for GOP 517, if the response to Question IV.A.1 is "YES," complete Sections IV.C and IV.F.</i> <i>For GOP applications, if the response to Question IV.A.1 is "NO," go to Section VI.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	2. The application area is located in Bexar, Comal, Ellis, Hays, or McLennan County and includes a cement kiln. <i>If the response to Question IV.A.2 is "YES," go to Question IV.H.1.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
	3. The application area includes a utility electric generator in an east or central Texas county. <i>See instructions for a list of counties included.</i> <i>If the response to Question IV.A.3 is "YES," go to Question IV.G.1.</i> <i>If the responses to Questions IV.A.1 - 3 are all "NO," go to Question IV.H.1.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

**B. Utility Electric Generation in Ozone Nonattainment Areas**

	1. The application area includes units specified in 30 TAC §§ 117.1000, 117.1200, or 117.1300. <i>If the response to Question IV.B.1 is "NO," go to Question IV.C.1.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	2. The application area is complying with a System Cap in 30 TAC §§ 117.1020 or 117.1220.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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**IV. Title 30 TAC Chapter 117 - Control of Air Pollution from Nitrogen Compounds (continued)**

**C. Commercial, Institutional, and Industrial Sources in Ozone Nonattainment Areas**

◆	1. The application area is located at a site subject to 30 TAC Chapter 117, Subchapter B and includes units specified in 30 TAC §§ 117.100, 117.300, or 117.400.  <i>For SOP applications, if the response to Question IV.C.1 is "NO," go to Question IV.D.1. For GOP applications for GOP 517, if the response to Question IV.C.1 is "NO," go to Section IV.F.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	2. The application area is located at a site that was a major source of NO <sub>x</sub> before November 15, 1992.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
◆	3. The application area includes an electric generating facility required to comply with the System Cap in 30 TAC § 117.320.	<input type="checkbox"/> YES <input type="checkbox"/> NO

**D. Adipic Acid Manufacturing**

1.	The application area is located at, or part of, an adipic acid production unit.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
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**E. Nitric Acid Manufacturing - Ozone Nonattainment Areas**

1.	The application area is located at, or part of, a nitric acid production unit.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
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**F. Combustion Control at Minor Sources in Ozone Nonattainment Areas - Boilers, Process Heaters, Stationary Engines and Gas Turbines**

◆	1. The application area is located at a site that is a minor source of NO <sub>x</sub> in the Houston/Galveston/Brazoria or Dallas/Fort Worth Eight-Hour areas (except for Wise County).  <i>For SOP applications, if the response to Question IV.F.1 is "NO," go to Question IV.G.1. For GOP applications, if the response to Question IV.F.1 is "NO," go to Section VI.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆	2. The application area is located in the Houston/Galveston/Brazoria area and has units that qualify for an exemption under 30 TAC § 117.2003(a).	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆	3. The application area is located in the Houston/Galveston/Brazoria area and has units that qualify for an exemption under 30 TAC § 117.2003(b).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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**IV. Title 30 TAC Chapter 117 - Control of Air Pollution from Nitrogen Compounds (continued)**

**F. Combustion Control at Minor Sources in Ozone Nonattainment Areas - Boilers, Process Heaters, Stationary Engines and Gas Turbines (continued)**

◆	4. The application area is located in the Dallas/Fort Worth Eight-Hour area (except for Wise County) and has units that qualify for an exemption under 30 TAC § 117.2103.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	5. The application area has units subject to the emission specifications under 30 TAC §§ 117.2010 or 30 TAC § 117.2110.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	6. The application area has a unit that has been approved for alternative case specific specifications (ACSS) in 30 TAC § 117.2025 or 30 TAC § 117.2125. <i>If the response to Question IV.F.6 is "NO," go to Section IV.G.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	7. An ACSS for carbon monoxide (CO) has been approved?	<input type="checkbox"/> YES <input type="checkbox"/> NO
	8. An ACSS for ammonia (NH <sub>3</sub> ) has been approved?	<input type="checkbox"/> YES <input type="checkbox"/> NO
	9. Provide the Permit Number(s) and authorization/issuance date(s) of the NSR project(s) that incorporates an ACSS below.	

**G. Utility Electric Generation in East and Central Texas**

	1. The application area includes utility electric power boilers and/or stationary gas turbines (including duct burners used in turbine exhaust ducts) that were placed into service before December 31, 1995. <i>If the response to Question IV.G.1 is "NO," go to Question IV.H.1.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	2. The application area is complying with the System Cap in 30 TAC § 117.3020.	<input type="checkbox"/> YES <input type="checkbox"/> NO

**H. Multi-Region Combustion Control - Water Heaters, Small Boilers, and Process Heaters**

	1. The application area includes a manufacturer, distributor, retailer or installer of natural gas fired water heaters, boilers or process heaters with a maximum rated capacity of 2.0 MMBtu/hr or less. <i>If the response to question IV.H.1 is "NO," go to Section V.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	2. All water heaters, boilers or process heaters manufactured, distributed, retailed or installed qualify for an exemption under 30 TAC § 117.3203.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 16</b>	
<b>V. Title 40 Code of Federal Regulations Part 59 (40 CFR Part 59) - National Volatile Organic Compound Emission Standards for Consumer and Commercial Products</b>	
<b>A. Subpart B - National Volatile Organic Compound Emission Standards for Automobile Refinish Coatings</b>	
1. The application area manufactures automobile refinishing coatings or coating components and sells or distributes these coatings or coating components in the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area imports automobile refinishing coatings or coating components, manufactured on or after January 11, 1999, and sells or distributes these coatings or coating components in the United States. <i>If the responses to Questions V.A.1 and V.A.2 are both "NO," go to Section V.B.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. All automobile refinishing coatings or coating components manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR § 59.100(c)(1) - (6).	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>B. Subpart C - National Volatile Organic Compound Emission Standards for Consumer Products</b>	
1. The application area manufactures consumer products for sale or distribution in the United States.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area imports consumer products manufactured on or after December 10, 1998 and sells or distributes these consumer products in the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area is a distributor of consumer products whose name appears on the label of one or more of the products. <i>If the responses to Questions V.B.1 - V.B.3 are all "NO," go to Section V.C.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
4. All consumer products manufactured, imported, or distributed by the application area meet one or more of the exemptions specified in 40 CFR § 59.201(c)(1) - (7).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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<b>Form OP-REQ1: Page 17</b>	
<b>V. Title 40 Code of Federal Regulations Part 59 (40 CFR Part 59) - National Volatile Organic Compound Emission Standards for Consumer and Commercial Products (continued)</b>	
<b>C. Subpart D - National Volatile Organic Compound Emission Standards for Architectural Coatings</b>	
1. The application area manufactures or imports architectural coatings for sale or distribution in the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area manufactures or imports architectural coatings that are registered under the Federal Insecticide, Fungicide, and Rodenticide Act. <i>If the responses to Questions V.C.1-2 are both "NO," go to Section V.D.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. All architectural coatings manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR §59.400(c)(1)-(5).	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>D. Subpart E - National Volatile Organic Compound Emission Standards for Aerosol Coatings</b>	
1. The application area manufactures or imports aerosol coating products for sale or distribution in the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area is a distributor of aerosol coatings for resale or distribution in the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>E. Subpart F - Control of Evaporative Emissions From New and In-Use Portable Fuel Containers</b>	
1. The application area manufactures or imports portable fuel containers for sale or distribution in the United States. <i>If the response to Question V.E.1 is "NO," go to Section VI.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. All portable fuel containers manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR § 59.605(a) - (c).	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards</b>	
<b>A. Applicability</b>	
◆ 1. The application area includes a unit(s) that is subject to one or more 40 CFR Part 60 subparts. <i>If the response to Question VI.A.1 is "NO," go to Section VII.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

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**VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)**

**B. Subpart Y - Standards of Performance for Coal Preparation and Processing Plants**

1.	The application area is located at a coal preparation and processing plant. <i>If the response to Question VI.B.1 is "NO," go to Section VI.C.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2.	The coal preparation and processing plant has a design capacity greater than 200 tons per day (tpd). <i>If the response to Question VI.B.2 is "NO," go to Section VI.C.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3.	The plant has an option to enforceably limit its operating level to less than 200 tpd and is choosing this option. <i>If the response to Question VI.B.3 is "YES," go to Section VI.C.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4.	The plant contains an open storage pile, as defined in § 60.251, as an affected facility. <i>If the response to Question VI.B.4 is "NO," go to Section VI.C.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
5.	The open storage pile was constructed, reconstructed or modified after May 27, 2009.	<input type="checkbox"/> YES <input type="checkbox"/> NO

**C. Subpart GG - Standards of Performance for Stationary Gas Turbines (GOP applicants only)**

◆	1. The application area includes one or more stationary gas turbines that have a heat input at peak load greater than or equal to 10 MMBtu/hr (10.7GJ/hr), based on the lower heating value of the fuel fired. <i>If the response to Question VI.C.1 is "NO" or "N/A," go to Section VI.D.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
◆	2. One or more of the affected facilities were constructed, modified, or reconstructed after October 3, 1977 and prior to February 19, 2005. <i>If the response to Question VI.C.2 is "NO," go to Section VI.D.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	3. One or more stationary gas turbines in the application area are using a previously approved alternative fuel monitoring schedule as specified in 40 CFR § 60.334(h)(4).	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	4. The exemption specified in 40 CFR § 60.332(e) is being utilized for one or more stationary gas turbines in the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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<b>Form OP-REQ1: Page 19</b>		
<b>VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)</b>		
<b>C. Subpart GG - Standards of Performance for Stationary Gas Turbines (GOP applicants only) (continued)</b>		
◆	5. One or more stationary gas turbines subject to 40 CFR Part 60, Subpart GG in the application area is injected with water or steam for the control of nitrogen oxides.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>D. Subpart XX - Standards of Performance for Bulk Gasoline Terminals</b>		
	1. The application area includes bulk gasoline terminal loading racks. <i>If the response to Question VI.D.1 is "NO," go to Section VI.E.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
	2. One or more of the loading racks were constructed or modified after December 17, 1980, and are not subject to 40 CFR Part 63, Subpart CC.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>E. Subpart LLL - Standards of Performance for Onshore Natural Gas Processing: Sulfur Dioxide (SO<sub>2</sub>) Emissions</b>		
◆	1. The application area includes affected facilities identified in 40 CFR § 60.640(a) that process natural gas (onshore). <i>For SOP applications, if the response to Question VI.E.1 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.1 is "NO" or "N/A," go to Section VI.H.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	2. The affected facilities commenced construction or modification after January 20, 1984 and on or before August 23, 2011. <i>For SOP applications, if the response to Question VI.E.2 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.2 is "NO," go to Section VI.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	3. The application area includes a gas sweetening unit with a design capacity greater than or equal to 2 long tons per day (LTPD) of hydrogen sulfide but operates at less than 2 LTPD. <i>For SOP applications, if the response to Question VI.E.3 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.3 is "NO," go to Section VI.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 20</b>	
<b>VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)</b>	
<b>E. Subpart LLL - Standards of Performance for Onshore Natural Gas Processing: Sulfur Dioxide (SO<sub>2</sub>) Emissions (continued)</b>	
◆ 4. Federally enforceable operating limits have been established in the preconstruction authorization limiting the gas sweetening unit to less than 2 LTPD. <i>For SOP applications, if the response to Question VI.E.4. is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.4. is "NO," go to Section VI.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 5. Please provide the Unit ID(s) for the gas sweetening unit(s) that have established federally enforceable operating limits in the space provided below.	
<b>F. Subpart OOO - Standards of Performance for Nonmetallic Mineral Processing Plants</b>	
1. The application area includes affected facilities identified in 40 CFR § 60.670(a)(1) that are located at a fixed or portable nonmetallic mineral processing plant. <i>If the response to Question VI.F.1 is "NO," go to Section VI.G.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. Affected facilities identified in 40 CFR § 60.670(a)(1) and located in the application area are subject to 40 CFR Part 60, Subpart OOO.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>G. Subpart QQQ - Standards of Performance for VOC Emissions from Petroleum Refinery Wastewater Systems</b>	
1. The application area is located at a petroleum refinery and includes one or more of the affected facilities identified in 40 CFR § 60.690(a)(2) - (4) for which construction, modification, or reconstruction was commenced after May 4, 1987. <i>If the response to Question VI.G.1 is "NO," go to Section VI.H.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes storm water sewer systems.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 21</b>	
<b>VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)</b>	
<b>G. Subpart QQQ - Standards of Performance for VOC Emissions from Petroleum Refinery Wastewater Systems (continued)</b>	
3. The application area includes ancillary equipment which is physically separate from the wastewater system and does not come in contact with or store oily wastewater.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes non-contact cooling water systems.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes individual drain systems. <i>If the response to Question VI.G.5 is "NO," go to Section VI.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes one or more individual drain systems that meet the exemption specified in 40 CFR § 60.692-2(d).	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes completely closed drain systems.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>H. Subpart AAAA - Standards of Performance for Small Municipal Waste Incineration Units for Which Construction Commenced After August 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 6, 2004</b>	
◆ 1. The application area includes at least one small municipal waste incineration unit, other than an air curtain incinerator. <i>If the response to Question VI.H.1. is "N/A," go to Section VI.I. If the response to Question VI.H.1 is "NO," go to Question VI.H.4.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
◆ 2. The application area includes at least one small municipal waste incineration unit, other than an air curtain incinerator, constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 3. The application area includes at least one small municipal waste incineration unit, other than an air curtain incinerator, constructed before August 30, 1999 and not modified or reconstructed on or after June 6, 2006.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 4. The application area includes at least one air curtain incinerator. <i>If the response to Question VI.H.4 is "NO," go to Section VI.I.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)</b>	
<b>H. Subpart AAAA - Standards of Performance for Small Municipal Waste Incineration Units for Which Construction Commenced After August 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 6, 2004 (continued)</b>	
◆ 5. The application area includes at least one air curtain incinerator constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006. <i>If the response to Question VI.H.5 is "NO," go to Question VI.H.7.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 6. All air curtain incinerators constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006 combust only yard waste.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 7. The application area includes at least one air curtain incinerator constructed before August 30, 1999 and not modified or reconstructed on or after June 6, 2006.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 8. All air curtain incinerators constructed before August 30, 1999 and not modified or reconstructed on or after June 6, 2006 combust only yard waste.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>I. Subpart CCCC - Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction Commenced After November 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 1, 2001</b>	
◆ 1. The application area includes at least one commercial or industrial solid waste incineration unit, other than an air curtain incinerator. <i>If the response to Question VI.I.1 is "N/A," go to Section VI.J. If the response to Question VI.I.1 is "NO," go to Question VI.I.4.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
◆ 2. The application area includes at least one commercial or industrial solid waste incineration unit, other than an air curtain incinerator, constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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**VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)**

**I. Subpart CCCC - Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction Commenced After November 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 1, 2001 (continued)**

◆	3. The application area includes at least one commercial or industrial solid waste incineration unit, other than an air curtain incinerator, constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	4. The application area includes at least one air curtain incinerator. <i>If the response to Question VI.I.4 is "NO," go to Section VI.J.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	5. The application area includes at least one air curtain incinerator, constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001. <i>If the response to Question VI.I.5 is "NO," go to VI.I.7.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	6. All air curtain incinerators constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	7. The application area includes at least one air curtain incinerator, constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	8. All air curtain incinerators constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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**VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)**

**J. Subpart EEEE - Standards of Performance for Other Solid Waste Incineration Units for Which Construction Commenced After December 9, 2004 or for Which Modification or Reconstruction Commenced on or After June 16, 2006**

◆	1. The application area includes at least one very small municipal waste incineration unit or institutional incineration unit, other than an air curtain incinerator. <i>If the response to Question VI.J.1 is "N/A," go to Section VI.K. If the response to Question VI.J.1 is "NO," go to Question VI.J.4.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
◆	2. The application area includes at least one very small municipal waste incineration unit, other than an air curtain incinerator, constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	3. The application area includes at least one very small municipal waste incineration unit, other than an air curtain incinerator, constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	4. The application area includes at least one air curtain incinerator. <i>If the response to Question VI.J.4 is "NO," go to Section VI.K.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	5. The application area includes at least one air curtain incinerator constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006. <i>If the response to Question VI.J.5 is "NO," go to Question VI.J.7.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	6. All air curtain incinerators constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	7. The application area includes at least one air curtain incinerator constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (NSPS) (continued)</b>	
<b>J. Subpart EEEE - Standards of Performance for Other Solid Waste Incineration Units for Which Construction Commenced After December 9, 2004 or for Which Modification or Reconstruction Commenced on or After June 16, 2006 (continued)</b>	
◆ 8. All air curtain incinerators constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 9. The air curtain incinerator is located at an institutional facility and is a distinct operating unit of the institutional facility that generated the waste.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 10. The air curtain incinerator burns less than 35 tons per day of wood waste, clean lumber, or yard waste or a mixture of these materials.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>K. Subpart OOOO - Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution</b>	
◆ 1. The application area includes one or more of the onshore affected facilities listed in 40 CFR § 60.5365(a)-(g) that are subject to 40 CFR Part 60, Subpart OOOO.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants</b>	
<b>A. Applicability</b>	
◆ 1. The application area includes a unit(s) that is subject to one or more 40 CFR Part 61 subparts. <i>If the response to Question VII.A.1 is "NO" or "N/A," go to Section VIII.</i>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
<b>B. Subpart F - National Emission Standard for Vinyl Chloride</b>	
1. The application area is located at a plant which produces ethylene dichloride by reaction of oxygen and hydrogen chloride with ethylene, vinyl chloride by any process, and/or one or more polymers containing any fraction of polymerized vinyl chloride.	YES <input type="checkbox"/> NO
<b>C. Subpart J - National Emission Standard for Benzene Emissions for Equipment Leaks Emission Sources) of Benzene (Complete this section for GOP applications only)</b>	
◆ 1. The application area includes equipment in benzene service.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A

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<b>VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)</b>	
<b>D. Subpart L - National Emission Standard for Benzene Emissions from Coke By-Product Recovery Plants</b>	
1. The application area is located at a coke by-product recovery plant and includes one or more of the affected sources identified in 40 CFR § 61.130(a) - (b). <i>If the response to Question VII.D.1 is "NO," go to Section VII.E.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area includes equipment in benzene service as determined by 40 CFR § 61.137(b).	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area has elected to comply with the provisions of 40 CFR § 61.243-1 and 40 CFR § 61.243-2.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>E. Subpart M - National Emission Standard for Asbestos</b>	
<b><i>Applicability</i></b>	
1. The application area includes sources, operations, or activities specified in 40 CFR §§ 61.143, 61.144, 61.146, 61.147, 61.148, or 61.155. <i>If the response to Question VII.E.1 is "NO," go to Section VII.F.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b><i>Roadway Construction</i></b>	
2. The application area includes roadways constructed or maintained with asbestos tailings or asbestos-containing waste material.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b><i>Manufacturing Commercial Asbestos</i></b>	
3. The application area includes a manufacturing operation using commercial asbestos. <i>If the response to Question VII.E.3 is "NO," go to Question VII.E.4.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
a. Visible emissions are discharged to outside air from the manufacturing operation	<input type="checkbox"/> YES <input type="checkbox"/> NO
b. An alternative emission control and waste treatment method is being used that has received prior U.S. Environmental Protection Agency (EPA) approval.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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<b>VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)</b>	
<b>E. Subpart M - National Emission Standard for Asbestos (continued)</b>	
<b><i>Manufacturing Commercial Asbestos (continued)</i></b>	
c. Asbestos-containing waste material is processed into non-friable forms.	YES <input type="checkbox"/> NO <input type="checkbox"/>
d. Asbestos-containing waste material is adequately wetted.	YES <input type="checkbox"/> NO <input type="checkbox"/>
e. Alternative filtering equipment is being used that has received EPA approval.	YES <input type="checkbox"/> NO <input type="checkbox"/>
f. A high efficiency particulate air (HEPA) filter is being used that is certified to be at least 99.97% efficient for 0.3 micron particles	YES <input type="checkbox"/> NO <input type="checkbox"/>
g. The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.	YES <input type="checkbox"/> NO <input type="checkbox"/>
<b><i>Asbestos Spray Application</i></b>	
4. The application area includes operations in which asbestos-containing materials are spray applied. <i>If the response to Question VII.E.4 is "NO," go to Question VII.E.5.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
a. Asbestos fibers are encapsulated with a bituminous or resinous binder during spraying and are not friable after drying. <i>If the response to Question VII.E.4.a is "YES," go to Question VII.E.5.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
b. Spray-on applications on buildings, structures, pipes, and conduits do not use material containing more than 1% asbestos.	<input type="checkbox"/> YES <input type="checkbox"/> NO
c. An alternative emission control and waste treatment method is being used that has received prior EPA approval.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)</b>	
<b>E. Subpart M - National Emission Standard for Asbestos (continued)</b>	
<b><i>Asbestos Spray Application (continued)</i></b>	
d. Asbestos-containing waste material is processed into non-friable forms.	YES <input type="checkbox"/> NO <input type="checkbox"/>
e. Asbestos-containing waste material is adequately wetted.	YES <input type="checkbox"/> NO <input type="checkbox"/>
f. Alternative filtering equipment is being used that has received EPA approval.	YES <input type="checkbox"/> NO <input type="checkbox"/>
g. A HEPA filter is being used that is certified to be at least 99.97% efficient for 0.3 micron particles.	YES <input type="checkbox"/> NO <input type="checkbox"/>
h. The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.	YES <input type="checkbox"/> NO <input type="checkbox"/>
<b><i>Fabricating Commercial Asbestos</i></b>	
5. The application area includes a fabricating operation using commercial asbestos. <i>If the response to Question VII.E.5 is "NO," go to Question VII.E.6.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
a. Visible emissions are discharged to outside air from the manufacturing operation.	<input type="checkbox"/> YES <input type="checkbox"/> NO
b. An alternative emission control and waste treatment method is being used that has received prior EPA approval.	<input type="checkbox"/> YES <input type="checkbox"/> NO
c. Asbestos-containing waste material is processed into non-friable forms.	<input type="checkbox"/> YES <input type="checkbox"/> NO
d. Asbestos-containing waste material is adequately wetted.	<input type="checkbox"/> YES <input type="checkbox"/> NO
e. Alternative filtering equipment is being used that has received EPA approval.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)</b>	
<b>E. Subpart M - National Emission Standard for Asbestos (continued)</b>	
<b><i>Fabricating Commercial Asbestos (continued)</i></b>	
f. A HEPA filter is being used that is certified to be at least 99.97% efficient for 0.3 micron particles.	YES <input type="checkbox"/> NO <input type="checkbox"/>
g. The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.	YES <input type="checkbox"/> NO <input type="checkbox"/>
<b><i>Non-sprayed Asbestos Insulation</i></b>	
6. The application area includes insulating materials (other than spray applied insulating materials) that are either molded and friable or wet-applied and friable after drying.	YES <input type="checkbox"/> NO <input type="checkbox"/>
<b><i>Asbestos Conversion</i></b>	
7. The application area includes operations that convert regulated asbestos-containing material and asbestos-containing waste material into nonasbestos (asbestos-free) material.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>F. Subpart P - National Emission Standard for Inorganic Arsenic Emissions from Arsenic Trioxide and Metallic Arsenic Production Facilities</b>	
1. The application area is located at a metallic arsenic production plant or at an arsenic trioxide plant that processes low-grade arsenic bearing materials by a roasting condensation process.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>G. Subpart BB - National Emission Standard for Benzene Emissions from Benzene Transfer Operations</b>	
1. The application area is located at a benzene production facility and/or bulk terminal. <i>If the response to Question VII.G.1 is "NO," go to Section VII.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area includes benzene transfer operations at marine vessel loading racks.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)</b>	
<b>G. Subpart BB - National Emission Standard for Benzene Emissions from Benzene Transfer Operations (continued)</b>	
3. The application area includes benzene transfer operations at railcar loading racks.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes benzene transfer operations at tank-truck loading racks.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>H. Subpart FF - National Emission Standard for Benzene Waste Operations</b>	
<b>Applicability</b>	
1. The application area includes a chemical manufacturing plant, coke by-product recovery plant, or petroleum refinery facility as defined in § 61.341.	<input type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area is located at a hazardous waste treatment, storage, and disposal (TSD) facility site as described in 40 CFR § 61.340(b). <i>If the responses to Questions VII.H.1 and VII.H.2 are both "NO," go to Section VIII.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area is located at a site that has no benzene onsite in wastes, products, byproducts, or intermediates. <i>If the response to Question VII.H.3 is "YES," go to Section VIII.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area is located at a site having a total annual benzene quantity from facility waste less than 1 megagram per year (Mg/yr). <i>If the response to Question VII.H.4 is "YES," go to Section VIII</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area is located at a site having a total annual benzene quantity from facility waste greater than or equal to 1 Mg/yr but less than 10 Mg/yr. <i>If the response to Question VII.H.5 is "YES," go to Section VIII.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)</b>	
<b>H. Subpart FF - National Emission Standard for Benzene Waste Operations (continued)</b>	
<b>Applicability (continued)</b>	
6. The flow-weighted annual average benzene concentration of each waste stream at the site is based on documentation.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area has waste streams with flow-weighted annual average water content of 10% or greater.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Waste Stream Exemptions</b>	
8. The application area has waste streams that meet the exemption specified in 40 CFR § 61.342(c)(2) (the flow-weighted annual average benzene concentration is less than 10 ppmw).	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. The application area has waste streams that meet the exemption specified in 40 CFR § 61.342(c)(3) because process wastewater has a flow rate less than 0.02 liters per minute or an annual wastewater quantity less than 10 Mg/yr.	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The application area has waste streams that meet the exemption specified in 40 CFR § 61.342(c)(3) because the total annual benzene quantity is less than or equal to 2 Mg/yr.	<input type="checkbox"/> YES <input type="checkbox"/> NO
11. The application area transfers waste off-site for treatment by another facility.	<input type="checkbox"/> YES <input type="checkbox"/> NO
12. The application area is complying with 40 CFR § 61.342(d).	<input type="checkbox"/> YES <input type="checkbox"/> NO
13. The application area is complying with 40 CFR § 61.342(e). <i>If the response to Question VII.H.13 is "NO," go to Question VII.H.15.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
14. The application area has facility waste with a flow weighted annual average water content of less than 10%.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)</b>	
<b>H. Subpart FF - National Emission Standard for Benzene Waste Operations (continued)</b>	
<b>Container Requirements</b>	
15. The application area has containers, as defined in 40 CFR § 61.341, that receive non-exempt benzene waste. <i>If the response to Question VII.H.15 is "NO," go to Question VII.H.18.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
16. The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers. <i>If the response to Question VII.H.16 is "YES," go to Question VII.H.18.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
17. Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Individual Drain Systems</b>	
18. The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage non-exempt benzene waste. <i>If the response to Question VII.H.18 is "NO," go to Question VII.H.25.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
19. The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. <i>If the response to Question VII.H.19 is "YES," go to Question VII.H.25.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
20. The application area has individual drain systems complying with 40 CFR § 61.346(a). <i>If the response to Question VII.H.20 is "NO," go to Question VII.H.22.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
21. Covers and closed-vent systems used for individual drain systems operate such that the individual drain system is maintained at a pressure less than atmospheric pressure.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)</b>	
<b>H. Subpart FF - National Emission Standard for Benzene Waste Operations (continued)</b>	
<i>Individual Drain Systems (continued)</i>	
22. The application area has individual drain systems complying with 40 CFR § 61.346(b). <i>If the response to Question VII.H.22 is "NO," go to Question VII.H.25.</i>	YES <input type="checkbox"/> NO <input type="checkbox"/>
23. Junction boxes in the individual drain systems are equipped with a system to prevent the flow of organic vapors from the junction box vent pipe to the atmosphere during normal operation.	YES <input type="checkbox"/> NO <input type="checkbox"/>
24. Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device.	YES <input type="checkbox"/> NO <input type="checkbox"/>
<i>Remediation Activities</i>	
25. Remediation activities take place at the application area subject to 40 CFR Part 61, Subpart FF.	YES <input type="checkbox"/> NO <input type="checkbox"/>
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories</b>	
<b>A. Applicability</b>	
◆ 1. The application area includes a unit(s) that is subject to one or more 40 CFR Part 63 subparts other than subparts made applicable by reference under subparts in 40 CFR Part 60, 61 or 63. <i>See instructions for 40 CFR Part 63 subparts made applicable only by reference.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
<b>B. Subpart F - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry</b>	
1. The application area is located at a plant site that is a major source as defined in the Federal Clean Air Act § 112(a). <i>If the response to Question VIII.B.1 is "NO," go to Section VIII.D.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>B. Subpart F - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry (continued)</b>	
<p>2. The application area is located at a site that includes at least one chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii).</p> <p><i>If the response to Question VIII.B.2 is "NO," go to Section VIII.D.</i></p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<p>3. The application area is located at a site that includes at least one chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii) and uses as a reactant or manufactures as a product, or co-product, one or more of the organic hazardous air pollutants listed in table 2 of 40 CFR Part 63, Subpart F.</p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<p>4. The application area includes a chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii) and uses as a reactant or manufactures as a product, or co-product, one or more of the organic hazardous air pollutants listed in table 2 of 40 CFR Part 63, Subpart F.</p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<p>5. The application area includes a chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii) and does <u>not</u> use as a reactant or manufacture as a product, or co-product, one or more of the organic hazardous air pollutants listed in table 2 of 40 CFR Part 63, Subpart F.</p> <p><i>If the response to Questions VIII.B.3, B.4 and B.5 are all "NO," go to Section VIII.D.</i></p>	<input type="checkbox"/> YES <input type="checkbox"/> NO



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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater</b>	
<b>Applicability</b>	
1. The application area is located at a site that is subject to 40 CFR 63, Subpart F and the application area includes process vents, storage vessels, transfer racks, or waste streams associated with a chemical manufacturing process subject to 40 CFR 63, Subpart F. <i>If the response to Question VIII.C.1 is "NO," go to Section VIII.D.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area includes fixed roofs, covers, and/or enclosures that are required to comply with 40 CFR § 63.148.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes vapor collection systems or closed-vent systems that are required to comply with 40 CFR § 63.148. <i>If the response to Question VIII.C.3 is "NO," go to Question VIII.C.8.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes vapor collection systems or closed-vent systems that are constructed of hard-piping.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes vapor collection systems or closed-vent systems that contain bypass lines that could divert a vent stream away from a control device and to the atmosphere. <i>If the response to Question VIII.C.5 is "NO," go to Question VIII.C.8.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Vapor Collection and Closed Vent Systems</b>	
6. Flow indicators are installed, calibrated, maintained, and operated at the entrances to bypass lines in the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. Bypass lines in the application area are secured in the closed position with a car-seal or a lock-and-key type configuration.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)</b>	
<b><i>Reloading or Cleaning of Railcars, Tank Trucks, or Barges</i></b>	
8. The application area includes reloading and/or cleaning of railcars, tank trucks, or barges that deliver HAPs to a storage tank. <i>If the response to Question VIII.C.8 is "NO," go to Question VIII.C.11.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. The application area includes operations that are complying with § 63.119(g)(6) through the use of a closed-vent system with a control device used to reduce inlet emissions of HAPs by at least 95 percent by weight or greater.	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The application area includes operations that are complying with § 63.119(g)(6) through the use of a vapor balancing system.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b><i>Transfer Racks</i></b>	
11. The application area includes Group 1 transfer racks that load organic HAPs.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b><i>Process Wastewater Streams</i></b>	
12. The application area includes process wastewater streams. <i>If the response to Question VIII.C.12 is "NO," go to Question VIII.C.34.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
13. The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Part 61, Subpart FF. <i>If the response to Question VIII.C.13 is "NO," go to Question VIII.C.15.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
14. The application area includes process wastewater streams that are complying with 40 CFR §§ 63.110(e)(1)(i) and (e)(1)(ii).	<input type="checkbox"/> YES <input type="checkbox"/> NO
15. The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Part 61, Subpart F. <i>If the response to Question VIII.C.15 is "NO," go to Question VIII.C.17.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)</b>	
<b><i>Process Wastewater Streams (continued)</i></b>	
16. The application area includes process wastewater streams utilizing the compliance option specified in 40 CFR § 63.110(f)(4)(ii).	<input type="checkbox"/> YES <input type="checkbox"/> NO
17. The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Parts 260 through 272. <i>If the response to Question VIII.C.17 is "NO," go to Question VIII.C.20.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
18. The application area includes process wastewater streams complying with 40 CFR § 63.110(e)(2)(i).	<input type="checkbox"/> YES <input type="checkbox"/> NO
19. The application are includes process wastewater streams complying with 40 CFR § 63.110(e)(2)(ii).	<input type="checkbox"/> YES <input type="checkbox"/> NO
20. The application area includes process wastewater streams, located at existing sources, that are designated as Group 1; are required to be treated as Group 1 under 40 CFR § 63.110; or are determined to be Group 1 for Table 9 compounds.	<input type="checkbox"/> YES <input type="checkbox"/> NO
21. The application area includes process wastewater streams, located at existing sources that are Group 2.	<input type="checkbox"/> YES <input type="checkbox"/> NO
22. The application area includes process wastewater streams, located at new sources, that are designated as Group 1; required to be treated as Group 1 under 40 CFR § 63.110; or are determined to be Group 1 for Table 8 or Table 9 compounds.	<input type="checkbox"/> YES <input type="checkbox"/> NO
23. The application area includes process wastewater streams, located at new sources that are Group 2 for both Table 8 and Table 9 compounds.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)</b>	
<b>Process Wastewater Streams (continued)</b>	
24. All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.C.24 is "YES," go to Question VIII.C.34.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
25. The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.C.25 is "NO," go to Question VIII.C.27.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
26. The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	<input type="checkbox"/> YES <input type="checkbox"/> NO
27. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	<input type="checkbox"/> YES <input type="checkbox"/> NO
28. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.C.27 - VIII.C.28 are both "NO," go to Question VIII.C.30.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
29. The application area includes waste management units that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	<input type="checkbox"/> YES <input type="checkbox"/> NO
30. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 39</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)</b>	
<b><i>Drains</i></b>	
31. The application area includes individual drain systems that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream. <i>If the response to Question VIII.C.31 is "NO," go to Question VIII.C.34.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
32. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	<input type="checkbox"/> YES <input type="checkbox"/> NO
33. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	<input type="checkbox"/> YES <input type="checkbox"/> NO
34. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of a chemical manufacturing process unit that meets the criteria of 40 CFR § 63.100(b). <i>If the response to Question VIII.C.34 is "NO," go to Question VIII.C.39.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
35. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes (that are part of a chemical manufacturing process unit) that meet the criteria listed in 40 CFR § 63.149(d). <i>If the response to Question VIII.C.35 is "NO," go to Question VIII.C.39.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
36. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds listed in 40 CFR Part 63 Subpart G, Table 9, at any flow rate.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 40</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>C. Subpart G-National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operation, and Wastewater (continued)</b>	
<b>Drains (continued)</b>	
37. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds listed in 40 CFR Part 63 Subpart G, Table 9, at an annual average flow rate greater than or equal to 10 liters per minute.	<input type="checkbox"/> YES <input type="checkbox"/> NO
38. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of a chemical manufacturing process unit that is subject to the new source requirements of 40 CFR § 63.100(l)(1) or (l)(2); and the equipment conveys water with a total annual average concentration greater than or equal to 10 parts per million by weight of compounds listed in 40 CFR Part 63 Subpart G, Table 8, at an average annual flow rate greater than or equal to 0.02 liter per minute.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Gas Streams</b>	
39. The application area includes gas streams meeting the characteristics of 40 CFR § 63.107(b) - (h) or the criteria of 40 CFR § 63.113(i) and are transferred to a control device not owned or operated by the applicant.	<input type="checkbox"/> YES <input type="checkbox"/> NO
40. The applicant is unable to comply with 40 CFR §§ 63.113 - 63.118 for one or more reasons described in 40 CFR § 63.100(q)(1), (3), or (5).	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>D. Subpart N - National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks</b>	
1. The application area includes chromium electroplating or chromium anodizing tanks located at hard chromium electroplating, decorative chromium electroplating, and/or chromium anodizing operations.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>E. Subpart O - Ethylene Oxide Emissions Standards for Sterilization Facilities</b>	
1. The application area includes sterilization facilities where ethylene oxide is used in the sterilization or fumigation of materials. <i>If the response to Question VIII.E.1 is "NO," go to Section VIII.F.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. Sterilization facilities located in the application area are subject to 40 CFR Part 63, Subpart O. <i>If the response to Question VIII.E.2 is "NO," go to Section VIII.F.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The sterilization source has used less than 1 ton (907 kg) of ethylene oxide within all consecutive 12-month periods after December 6, 1996.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The sterilization source has used less than 10 tons (9070 kg) of ethylene oxide within all consecutive 12-month periods after December 6, 1996.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>F. Subpart Q - National Emission Standards for Industrial Process Cooling Towers</b>	
1. The application area includes industrial process cooling towers. <i>If the response to Question VIII.F.1 is "NO," go to Section VIII.G.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. Chromium-based water treatment chemicals have been used on or after September 8, 1994.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>G. Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)</b>	
1. The application area includes a bulk gasoline terminal.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes a pipeline breakout station. <i>If the responses to Questions VIII.G.1 and VIII.G.2 are both "NO," go to Section VIII.H.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The bulk gasoline terminal or pipeline breakout station is located within a contiguous area and under common control with another bulk gasoline terminal or a pipeline breakout station. <i>If the response to Question VIII.G.3 is "YES," go to Question VIII.G.10.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>G. Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) (continued)</b>	
<p>4. The bulk gasoline terminal or pipeline breakout station is located within a contiguous area and under common control with sources, other than bulk gasoline terminals or pipeline breakout stations that emit or have the potential to emit HAPs.  <i>If the response to Question VIII.G.4 is "YES," go to Question VIII.G.10.</i></p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<p>5. An emissions screening factor was calculated for the bulk gasoline terminal or pipeline breakout station.  <i>If the response to Question VIII.G.5 is "NO," go to Question VIII.G.10.</i></p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<p>6. The value 0.04(OE) is less than 5% of the value of the bulk gasoline terminal emissions screening factor (ET) or the pipeline breakout station emissions screening factor (Ep).  <i>If the response to Question VIII.G.6 is "NO," go to Question VIII.G.10.</i></p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<p>7. Emissions screening factor less than 0.5 (ET or EP &lt; 0.5).  <i>If the response to Question VIII.G.7 is "YES," go to Section VIII.H.</i></p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<p>8. Emissions screening factor greater than or equal to 0.5, but less than 1.0 (0.5 ≤ ET or EP &lt; 1.0).  <i>If the response to Question VIII.G.8 is "YES," go to Section VIII.H.</i></p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<p>9. Emissions screening factor greater than or equal to 1.0 (ET or EP ≥ 1.0).  <i>If the response to Question VIII.G.9 is "YES," go to Question VIII.G.11.</i></p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<p>10. The site at which the application area is located is a major source of HAP.  <i>If the response to Question VIII.G.10 is "NO," go to Section VIII.H.</i></p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<p>11. The application area is using an alternative leak monitoring program as described in 40 CFR § 63.424(f).</p>	<input type="checkbox"/> YES <input type="checkbox"/> NO



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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>H. Subpart S - National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry</b>	
1. The application area includes processes that produce pulp, paper, or paperboard and are located at a plant site that is a major source of HAPs as defined in 40 CFR § 63.2. <i>If the response to Question VIII.H.1 is "NO," go to Section VIII.I.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area uses processes and materials specified in 40 CFR § 63.440(a)(1) - (3). <i>If the response to Question VIII.H.2 is "NO," go to Section VIII.I.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes one or more sources subject to 40 CFR Part 63, Subpart S that are existing sources. <i>If the response to Question VIII.H.3 is "NO," go to Section VIII.I.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes one or more kraft pulping systems that are existing sources.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes one or more dissolving-grade bleaching systems that are existing sources at a kraft or sulfite pulping mill.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes bleaching systems that are existing sources and are complying with the Voluntary Advanced Technology Incentives Program for Effluent Limitation Guidelines in 40 CFR § 430.24. <i>If the response to Question VIII.H.6 is "NO," go to Section VIII.I.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes bleaching systems that are complying with 40 CFR § 63.440(d)(3)(i).	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. The application area includes bleaching systems that are complying with 40 CFR § 63.440(d)(3)(ii).	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>I. Subpart T - National Emission Standards for Halogenated Solvent Cleaning</b>	
1. The application area includes an individual batch vapor, in-line vapor, in-line cold, and/or batch cold solvent cleaning machine that uses a hazardous air pollutant (HAP) solvent, or any combination of halogenated HAP solvents, in a total concentration greater than 5% by weight, as a cleaning and/or drying agent.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area is located at a major source and includes solvent cleaning machines, qualifying as affected facilities, that use perchloroethylene, trichloroethylene or methylene chloride.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area is located at an area source and includes solvent cleaning machines, other than cold batch cleaning machines, that use perchloroethylene, trichloroethylene or methylene chloride.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins</b>	
1. The application area includes elastomer product process units and/or wastewater streams and wastewater operations that are associated with elastomer product process units. <i>If the response to Question VIII.J.1 is "NO," go to Section VIII.K.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. Elastomer product process units and/or wastewater streams and wastewater operations located in the application area are subject to 40 CFR Part 63, Subpart U. <i>If the response to Question VIII.J.2 is "NO," go to Section VIII.K.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 for organic HAPs as defined in 40 CFR § 63.482.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes process wastewater streams that are Group 2 for organic HAPs as defined in 40 CFR § 63.482.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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**VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)**

**J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins (continued)**

5.	All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.J.5 is "YES," go to Question VIII.J.15.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
6.	The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.J.6 is "NO," go to Question VIII.J.8.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
7.	The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	<input type="checkbox"/> YES <input type="checkbox"/> NO
8.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	<input type="checkbox"/> YES <input type="checkbox"/> NO
9.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.J.8 - VIII.J.9 are both "NO," go to Question VIII.J.11.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
10.	The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 46</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins (continued)</b>	
<b>Containers</b>	
11. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Drains</b>	
12. The application area includes individual drain systems that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. <i>If the response to Question VIII.J.12 is "NO," go to Question VIII.J.15.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
13. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	<input type="checkbox"/> YES <input type="checkbox"/> NO
14. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	<input type="checkbox"/> YES <input type="checkbox"/> NO
15. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of an elastomer product process unit. <i>If the response to Question VIII.J.15 is "NO," go to Section VIII.K.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
16. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that meet the criteria listed in 40 CFR § 63.149(d) and § 63.501(a)(12). <i>If the response to Question VIII.J.16 is "NO," go to Section VIII.K.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 47</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins (continued)</b>	
<b>Drains (continued)</b>	
17. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.482, at any flow rate.	<input type="checkbox"/> YES <input type="checkbox"/> NO
18. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.482, at an annual average flow rate greater than or equal to 10 liters per minute.	<input type="checkbox"/> YES <input type="checkbox"/> NO
19. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of an elastomer product process unit that is a new affected source or part of a new affected source and the equipment conveys water with a total annual average concentration greater than or equal to 10 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.482, at an average annual flow rate greater than or equal to 0.02 liter per minute.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>K. Subpart W - National Emission Standards for Hazardous Air Pollutants for Epoxy Resins Production and Non-nylon Polyamides Production</b>	
1. The manufacture of basic liquid epoxy resins (BLR) and/or manufacture of wet strength resins (WSR) is conducted in the application area. <i>If the response to Question VIII.K.1 is "NO" or "N/A," go to Section VIII.L.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area includes a BLR and/or WSR research and development facility.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>L. Subpart X - National Emission Standards for Hazardous Air Pollutants from Secondary Lead Smelting</b>	
1. The application area includes one or more of the affected sources in 40 CFR § 63.541(a) that are located at a secondary lead smelter. <i>If the response to Question VIII.L.1 is "NO" or "N/A," go to Section VIII.M.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area is using and approved alternate to the requirements of § 63.545(c)(1)-(5) for control of fugitive dust emission sources.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>M. Subpart Y - National Emission Standards for Marine Tank Vessel Loading Operations</b>	
1. The application area includes marine tank vessel loading operations that are specified in 40 CFR § 63.560 and located at an affected source as defined in 40 CFR § 63.561.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>N. Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries</b>	
<b>Applicability</b>	
1. The application area includes petroleum refining process units and/or related emission points that are specified in 40 CFR § 63.640(c)(1) - (c)(7). <i>If the response to Question VIII.N.1 is "NO," go to Section VIII.O.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. All petroleum refining process units/and or related emission points within the application area are specified in 40 CFR § 63.640(g)(1) - (g)(7). <i>If the response to Question VIII.N.2 is "YES," go to Section VIII.O.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>N. Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries (continued)</b>	
<b>Applicability (continued)</b>	
3. The application area is located at a plant site that is a major source as defined in the Federal Clean Air Act § 112(a). <i>If the response to Question VIII.N.3 is "NO," go to Section VIII.O.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area is located at a plant site which emits or has equipment containing/contacting one or more of the HAPs listed in table 1 of 40 CFR Part 63, Subpart CC. <i>If the response to Question VIII.N.4 is "NO," go to Section VIII.O.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes Group 1 wastewater streams that are not conveyed, stored, or treated in a wastewater stream management unit that also receives streams subject to the provisions of 40 CFR §§ 63.133 - 63.147 of Subpart G wastewater provisions section.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes Group 2 wastewater streams that are not conveyed, stored, or treated in a wastewater stream management unit that also receives streams subject to the provisions of 40 CFR §§ 63.133 - 63.147 of Subpart G wastewater provisions section.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes Group 1 or Group 2 wastewater streams that are conveyed, stored, or treated in a wastewater stream management unit that also receives streams subject to the provisions of 40 CFR §§ 63.133 - 63.147 of Subpart G wastewater provisions section. <i>If the response to Question VIII.N.7 is "NO," go to Section VIII.O.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. The application area includes Group 1 or Group 2 wastewater streams that are complying with 40 CFR § 63.640(o)(2)(i).	<input type="checkbox"/> YES <input type="checkbox"/> NO

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**VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)**

**N. Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries (continued)**

**Applicability (continued)**

9. The application area includes Group 1 or Group 2 wastewater streams that are complying with 40 CFR § 63.640(o)(2)(ii). ☐ YES ☐ NO  
*If the response to Question VIII.N.9 is "NO," go to Section VIII.O.*

10. The application area includes Group 2 wastewater streams or organic streams whose benzene emissions are subject to control through the use of one or more treatment processes or waste management units under the provisions of 40 CFR Part 61, Subpart FF on or after December 31, 1992. ☐ YES ☐ NO

**Containers, Drains, and other Appurtenances**

11. The application area includes containers that are subject to the requirements of 40 CFR § 63.135 as a result of complying with 40 CFR § 63.640(o)(2)(ii). ☐ YES ☐ NO

12. The application area includes individual drain systems that are subject to the requirements of 40 CFR § 63.136 as a result of complying with 40 CFR § 63.640(o)(2)(ii). ☐ YES ☐ NO

**O. Subpart DD - National Emission Standards for Off-site Waste and Recovery Operations**

1. The application area receives material that meets the criteria for off-site material as specified in 40 CFR § 63.680(b)(1). ☐ YES ☒ NO ☐ N/A  
*If the response to Question VIII.O.1 is "NO" or "N/A," go to Section VIII.P*

2. Materials specified in 40 CFR § 63.680(b)(2) are received at the application area. ☐ YES ☐ NO

3. The application area has a waste management operation receiving off-site material and is regulated under 40 CFR Part 264 or Part 265. ☐ YES ☐ NO



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<b>Form OP-REQ1: Page 51</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>O. Subpart DD - National Emission Standards for Off-site Waste and Recovery Operations (continued)</b>	
4. The application area has a waste management operation treating wastewater which is an off-site material and is exempted under 40 CFR §§ 264.1(g)(6) or 265.1(c)(10).	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area has an operation subject to Clean Water Act, § 402 or § 307(b) but is not owned by a “state” or “municipality.”	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The predominant activity in the application area is the treatment of wastewater received from off-site.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area has a recovery operation that recycles or reprocesses hazardous waste which is an off-site material and is exempted under 40 CFR §§ 264.1(g)(2) or 265.1(c)(6).	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. The application area has a recovery operation that recycles or reprocesses used solvent which is an off-site material and is not part of a chemical, petroleum, or other manufacturing process that is required to use air emission controls by another subpart of 40 CFR Part 63 or Part 61.	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. The application area has a recovery operation that re-refines or reprocesses used oil which is an off-site material and is regulated under 40 CFR Part 279, Subpart F (Standards for Used Oil Processors and Refiners).	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The application area is located at a site where the total annual quantity of HAPs in the off-site material is less than 1 megagram per year. <i>If the response to Question VIII.O.10 is “YES,” go to Section VIII.P.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 52</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>O. Subpart DD - National Emission Standards for Off-site Waste and Recovery Operations (continued)</b>	
11. The application area receives offsite materials with average VOHAP concentration less than 500 ppmw at the point of delivery that are not combined with materials having a VOHAP concentration of 500 ppmw or greater. <i>If the response to Question VIII.O.11 is "NO," go to Question VIII.O.14.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
12. VOHAP concentration is determined by direct measurement.	<input type="checkbox"/> YES <input type="checkbox"/> NO
13. VOHAP concentration is based on knowledge of the off-site material.	<input type="checkbox"/> YES <input type="checkbox"/> NO
14. The application area includes an equipment component that is a pump, compressor, and agitator, pressure relief device, sampling connection system, open-ended valve or line, valve, connector or instrumentation system. <i>If the response to Question VIII.O.14 is "NO," go to Question VIII.O.17.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
15. An equipment component in the application area contains or contacts off-site material with a HAP concentration greater than or equal to 10% by weight.	<input type="checkbox"/> YES <input type="checkbox"/> NO
16. An equipment component in the application area is intended to operate 300 hours or more during a 12-month period.	<input type="checkbox"/> YES <input type="checkbox"/> NO
17. The application area includes containers that manage non-exempt off-site material.	<input type="checkbox"/> YES <input type="checkbox"/> NO
18. The application area includes individual drain systems that manage non-exempt off-site materials.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 53</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>P. Subpart GG - National Emission Standards for Aerospace Manufacturing and Rework Facilities</b>	
1. The application area includes facilities that manufacture or rework commercial, civil, or military aerospace vehicles or components. <i>If the response to Question VIII.P.1 is "NO" or "N/A," go to Section VIII.Q.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area includes one or more of the affected sources specified in 40 CFR § 63.741(c)(1) - (7).	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Q. Subpart HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities.</b>	
◆ 1. The application area contains facilities that process, upgrade or store hydrocarbon liquids that are located at oil and natural gas production facilities prior to the point of custody transfer.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆ 2. The application area contains facilities that process, upgrade or store natural gas prior to the point at which natural gas enters the natural gas transmission and storage source category or is delivered to a final end user. <i>For SOP applications, if the responses to Questions VIII.Q.1 and VIII.Q.2 are both "NO," go to Section VIII.R.</i> <i>For GOP applications, if the responses to Questions VIII.Q.1 and VIII.Q.2 are both "NO," go to Section VIII.Z.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆ 3. The application area contains only facilities that exclusively process, store or transfer black oil as defined in § 63.761. <i>For SOP applications, if the response to Question VIII.Q.3 is "YES," go to Section VIII.R.</i> <i>For GOP applications, if the response to Question VIII.Q.3 is "YES," go to Section VIII.Z.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 4. The application area is located at a site that is a major source of HAP. <i>If the response to Question VIII.Q.4 is "NO," go to Question VIII.Q.6.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 54</b>		
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>		
<b>Q. Subpart - HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities (continued)</b>		
◆	<p>5. The application area contains only a facility, prior to the point of custody transfer, with facility-wide actual annual average natural gas throughput less than 18.4 thousand standard cubic meters (649,789.9 ft<sup>3</sup>) per day and a facility-wide actual annual average hydrocarbon liquid throughput less than 39,700 liters (10,487.6 gallons) per day.</p> <p><i>For SOP applications, if the response to Question VIII.Q.5 is "YES," go to Section VIII.R.</i></p> <p><i>For GOP applications, if the response to Question VIII.Q.5 is "YES," go to Section VIII.Z.</i></p> <p><i>For all applications, if the response to Question VIII.Q.5 is "NO," go to Question VIII.Q.9.</i></p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	<p>6. The application area includes a triethylene glycol (TEG) dehydration unit.</p> <p><i>For SOP applications, if the answer to Question VIII.Q.6 is "NO," go to Section VIII.R. For GOP applications, if the response to Question VIII.Q.6 is "NO," go to Section VIII.Z.</i></p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	<p>7. The application area is located at a site that is within the boundaries of UA plus offset or a UC, as defined in 40 CFR § 63.761.</p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	<p>8. The site has actual emissions of 5 tons per year or more of a single HAP, or 12.5 tons per year or more of a combination of HAP.</p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	<p>9. Emissions for major source determination are being estimated based on the maximum natural gas or hydrocarbon liquid throughput as calculated in § 63.760(a)(1)(i)-(iii).</p>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 55</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>R. Subpart II - National Emission Standards for Shipbuilding and Ship Repair (Surface Coating)</b>	
1. The application area includes shipbuilding or ship repair operations. <i>If the response to Question VIII.R.1 is "NO," go to Section VIII.S.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. Shipbuilding or ship repair operations located in the application area are subject to 40 CFR Part 63, Subpart II.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>S. Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations</b>	
1. The application area includes wood furniture manufacturing operations and/or wood furniture component manufacturing operations. <i>If the response to Question VIII.S.1 is "NO" or "N/A," go to Section VIII.T.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area meets the definition of an "incidental wood manufacturer" as defined in 40 CFR § 63.801.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>T. Subpart KK - National Emission Standards for the Printing and Publishing Industry</b>	
1. The application area includes publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
<b>U. Subpart PP - National Emission Standards for Containers</b>	
1. The application area includes containers for which another 40 CFR Part 60, 61, or 63 subpart references the use of 40 CFR Part 63, Subpart PP for the control of air emissions. <i>If the response to Question VIII.U.1 is "NO," go to Section VIII.V.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes containers using Container Level 1 controls.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes containers using Container Level 2 controls.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>U. Subpart PP - National Emission Standards for Containers (continued)</b>	
4. The application area includes containers using Container Level 3 controls.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>V. Subpart RR - National Emission Standards for Individual Drain Systems</b>	
1. The application area includes individual drain systems for which another 40 CFR Part 60, 61, or 63 subpart references the use of 40 CFR Part 63, Subpart RR for the control of air emissions.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards</b>	
1. The application area includes an acetal resins production process unit; an acrylic and modacrylic fiber production process unit complying with 40 CFR § 63.1103(b)(3)(i); or an existing polycarbonate production process.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes process wastewater streams generated from an acetal resins production process unit; an acrylic and modacrylic fiber production process unit complying with 40 CFR § 63.1103(b)(3)(i); or an existing polycarbonate production process. <i>If the responses to Questions VIII.W.1 and VIII.W.2 are both "NO," go to Question VIII.W.20.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 under the requirements of 40 CFR § 63.132(c).	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes process wastewater streams that are determined to be Group 2 under the requirements of 40 CFR § 63.132(c).	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. All Group 1 wastewater streams at the site are determined to have a total source mass flow rate of less than 1 MG/yr.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.W.6 is "NO," go to Question VIII.W.8.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 57</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)</b>	
7. The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.W.8 and W.9 are both "NO," go to Question VIII.W.11.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	<input type="checkbox"/> YES <input type="checkbox"/> NO
11. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	<input type="checkbox"/> YES <input type="checkbox"/> NO
12. The application area includes individual drain systems that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. <i>If the response to Question VIII.W.12 is "NO," go to Question VIII.W.15.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
13. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of covers and, if vented, closed vent systems and control devices.	<input type="checkbox"/> YES <input type="checkbox"/> NO
14. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 58</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)</b>	
15. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of an acetal resins production process unit; an acrylic and modacrylic fiber production process unit complying with 40 CFR § 63.1103(b)(3)(i); or an existing polycarbonate production process unit. <i>If the response to Question VIII.W.15 is "NO," go to Question VIII.W.20.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
16. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that meet the criteria listed in 40 CFR § 63.1106(c)(1) - (3). <i>If the response to Question VIII.W.16 is "NO," go to Question VIII.W.20.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
17. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds meeting the definition of organic HAP in Table 9 to 40 CFR Part 60, Subpart G, at any flow rate.	<input type="checkbox"/> YES <input type="checkbox"/> NO
18. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds meeting the definition of organic HAP in Table 9 to 40 CFR Part 60, Subpart G, at an annual average flow rate greater than or equal to 10 liters per minute.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)</b>	
19. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of an acrylic resins or acrylic and modacrylic fiber production process unit that is part of a new affected source or is a new affected source and the equipment conveys water with a total annual average concentration greater than or equal to 10 ppmw of compounds meeting the definition of organic HAP in Table 9 to 40 CFR Part 60, Subpart G, at an average annual flow rate greater than or equal to 0.02 liter per minute.	<input type="checkbox"/> YES <input type="checkbox"/> NO
20. The application area includes an ethylene production process unit.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
21. The application area includes waste streams generated from an ethylene production process unit. <i>If the responses to Questions VIII.W.20 and VIII.W.21 are both "NO" or "N/A," go to Question VIII.W.54.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
22. The waste stream(s) contains at least one of the chemicals listed in 40 CFR § 63.1103(e), Table 7(g)(1). <i>If the response to Question VIII.W.22 is "NO," go to Question VIII.W.54.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
23. Waste stream(s) are transferred off-site for treatment. <i>If the response to Question VIII.W.23 is "NO," go to Question VIII.W.25.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
24. The application area has waste management units that treat or manage waste stream(s) prior to transfer off-site for treatment. <i>If the response to Question VIII.W.24 is "NO," go to Question VIII.W.54.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)</b>	
25. The total annual benzene quantity from waste at the site is less than 10 Mg/yr as determined according to 40 CFR § 61.342(a).	<input type="checkbox"/> YES <input type="checkbox"/> NO
26. The application area contains at least one waste stream that is a continuous butadiene waste stream as defined in 40 CFR § 63.1082(b). <i>If the response to Question VIII.W.26 is "NO," go to Question VIII.W.43.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
27. The waste stream(s) contains at least 10 ppmw 1, 3-butadiene at a flow rate of 0.02 liters per minute or is designated for control. <i>If the response to Question VIII.W.27 is "NO," go to Question VIII.W.43.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
28. The control requirements of 40 CFR Part 63, Subpart G for process wastewater as specified in 40 CFR § 63.1095(a)(2) are selected for control of the waste stream(s). <i>If the response to Question VIII.W.28 is "NO," go to Question VIII.W.33.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
29. The application area includes containers that receive, manage, or treat a continuous butadiene waste stream.	<input type="checkbox"/> YES <input type="checkbox"/> NO
30. The application area includes individual drain systems that receive, manage, or treat a continuous butadiene waste stream. <i>If the response to Question VIII.W.30 is "NO," go to Question VIII.W.43.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
31. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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**VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)**

**W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)**

32. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs. <i>If the response to Question VIII.W.32 is required, go to Question VIII.W.43.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
33. The application area has containers, as defined in 40 CFR § 61.341, that receive a continuous butadiene waste stream. <i>If the response to Question VIII.W.33 is "NO," go to Question VIII.W.36.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
34. The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers. <i>If the response to Question VIII.W.34 is "YES," go to Question VIII.W.36.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
35. Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	<input type="checkbox"/> YES <input type="checkbox"/> NO
36. The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage a continuous butadiene waste stream. <i>If the response to Question VIII.W.36 is "NO," go to Question VIII.W.43.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
37. The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. <i>If the response to Question VIII.W.37 is "YES," go to Question VIII.W.43.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)</b>	
38. The application area has individual drain systems complying with 40 CFR § 61.346(a). <i>If the response to Question VIII.W.38 is "NO," go to Question VIII.W.40.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
39. Covers and closed-vent systems used for individual drain systems operate such that the individual drain system is maintained at a pressure less than atmospheric pressure.	<input type="checkbox"/> YES <input type="checkbox"/> NO
40. The application area has individual drain systems complying with 40 CFR § 61.346(b). <i>If the response to Question VIII.W.40 is "NO," go to Question VIII.W.43.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
41. Junction boxes in the individual drain systems are equipped with a system to prevent the flow of organic vapors from the junction box vent pipe to the atmosphere during normal operation.	<input type="checkbox"/> YES <input type="checkbox"/> NO
42. Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device.	<input type="checkbox"/> YES <input type="checkbox"/> NO
43. The application area has at least one waste stream that contains benzene. <i>If the response to Question VIII.W.43 is "NO," go to Question VIII.W.54.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
44. The application area has containers, as defined in 40 CFR § 61.341, that receive a waste stream containing benzene. <i>If the response to Question VIII.W.44 is "NO," go to Question VIII.W.47.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
45. The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers. <i>If the response to Question VIII.W.45 is "YES," go to Question VIII.W.47.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 63</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)</b>	
46. Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	<input type="checkbox"/> YES <input type="checkbox"/> NO
47. The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage a waste stream containing benzene. <i>If the response to Question VIII.W.47 is "NO," go to Question VIII.W.54.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
48. The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. <i>If the response to Question VIII.W.48 is "YES," go to Question VIII.W.54.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
49. The application area has individual drain systems complying with 40 CFR § 61.346(a). <i>If the response to Question VIII.W.49 is "NO," go to Question VIII.W.51.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
50. Covers and closed-vent systems used for individual drain systems operate such that the individual drain system is maintained at a pressure less than atmospheric pressure.	<input type="checkbox"/> YES <input type="checkbox"/> NO
51. The application area has individual drain systems complying with 40 CFR § 61.346(b). <i>If the response to Question VIII.W.51 is "NO," go to Question VIII.W.54.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
52. Junction boxes in the individual drain systems are equipped with a system to prevent the flow of organic vapors from the junction box vent pipe to the atmosphere during normal operation.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 64</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)</b>	
53. Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device.	<input type="checkbox"/> YES <input type="checkbox"/> NO
54. The application area contains a cyanide chemicals manufacturing process. <i>If the response to Question VIII.W.54 is "NO," go to Section VIII.X.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
55. The cyanide chemicals manufacturing process generates maintenance wastewater containing hydrogen cyanide or acetonitrile.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>X. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins</b>	
1. The application area includes thermoplastic product process units, and/or their associated affected sources specified in 40 CFR § 63.1310(a)(1) - (5), that are subject to 40 CFR Part 63, Subpart JJJ. <i>If the response to Question VIII.X.1 is "NO," go to Section VIII.Y.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes thermoplastic product process units and/or wastewater streams and wastewater operations that are associated with thermoplastic product process units. <i>If the response to Question VIII.X.2 is "NO," go to Section VIII.Y.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. All process wastewater streams generated or managed in the application area are from sources producing polystyrene. <i>If the response to Question VIII.X.3 is "YES," go to Section VIII.Y.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. All process wastewater streams generated or managed in the application area are from sources producing ASA/AMSAN. <i>If the response to Question VIII.X.4 is "YES," go to Section VIII.Y.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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**VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)**

**X. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins (continued)**

5.	The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 for organic HAPs as defined in 40 CFR § 63.1312.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6.	The application area includes process wastewater streams, located at existing sources, that are Group 2 for organic HAPs as defined in 40 CFR § 63.1312.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7.	The application area includes process wastewater streams, located at new sources, that are Group 2 for organic HAPs as defined in 40 CFR § 63.1312.	<input type="checkbox"/> YES <input type="checkbox"/> NO
8.	All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.X.8 is "YES," go to Question VIII.X.18.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
9.	The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.X.9 is "NO," go to Question VIII.X.11.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
10.	The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	<input type="checkbox"/> YES <input type="checkbox"/> NO
11.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	<input type="checkbox"/> YES <input type="checkbox"/> NO
12.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.X.11 - VIII.X.12 are both "NO," go to Question VIII.X.14.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>X. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins (continued)</b>	
13. The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Containers</b>	
14. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Drains</b>	
15. The application area includes individual drain systems that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. <i>If the response to Question VIII.X.15 is "NO," go to Question VIII.X.18.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
16. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	<input type="checkbox"/> YES <input type="checkbox"/> NO
17. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	<input type="checkbox"/> YES <input type="checkbox"/> NO
18. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of a thermoplastic product process unit. <i>If the response to Question VIII.X.18 is "NO," go to Section VIII.Y.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO



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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>X. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins (continued)</b>	
<b><i>Drains (continued)</i></b>	
19. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that meet the criteria listed in 40 CFR § 63.149(d) and § 63.1330(b)(12). <i>If the response to Question VIII.X.19 is "NO," go to Section VIII.Y.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
20. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.1312, at any flow rate.	<input type="checkbox"/> YES <input type="checkbox"/> NO
21. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.1312, at an annual average flow rate greater than or equal to 10 liters per minute.	<input type="checkbox"/> YES <input type="checkbox"/> NO
22. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of an thermoplastic product process unit that is a new affected source or part of a new affected source and the equipment conveys water with a total annual average concentration greater than or equal to 10 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.1312, at an average annual flow rate greater than or equal to 0.02 liter per minute	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 68</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>Y. Subpart UUU - National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic reforming Units, and Sulfur Recovery Units.</b>	
1. The application area is subject to 40 CFR Part 63, Subpart UUU - National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic reforming Units, and Sulfur Recovery Units.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>Z. Subpart AAAA - National Emission Standards for Hazardous Air Pollutants for Municipal Solid Waste (MSW) Landfills.</b>	
◆ 1. The application area is subject to 40 CFR Part 63, Subpart AAAA - National Emission Standards for Hazardous Air Pollutants for Municipal Solid Waste Landfills.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON)</b>	
1. The application area is located at a site that includes process units that manufacture as a primary product one or more of the chemicals listed in 40 CFR § 63.2435(b)(1).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area is located at a plant site that is a major source as defined in FCAA § 112(a).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area is located at a site that includes miscellaneous chemical manufacturing process units (MCPU) that process, use or generate one or more of the organic hazardous air pollutants listed in § 112(b) of the Clean Air Act or hydrogen halide and halogen HAP. <i>If the response to Question VIII.AA.1, AA.2 or AA.3 is "NO," go to Section VIII.BB.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
4. The application area includes process vents, storage vessels, transfer racks, or waste streams associated with a miscellaneous chemical manufacturing process subject to 40 CFR 63, Subpart FFFF. <i>If the response to Question VIII.AA.4 is "NO," go to Section VIII.BB.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)</b>	
5. The application area includes process wastewater streams. <i>If the response to Question VIII.AA.5 is "NO," go to Question VIII.AA.18.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 for compounds listed in Table 8 of 40 CFR Part 63, Subpart G or Table 8 and Table 9, as appropriate, of 40 CFR Part 63, Subpart FFFF.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes process wastewater streams that are Group 2 for compounds listed in Table 8 or Table 8 and Table 9, as appropriate, of 40 CFR Part 63, Subpart FFFF.	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.AA.8 is "YES," go to Section VIII.AA.22.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.AA.9 is "NO," go to Question VIII.AA.11.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	<input type="checkbox"/> YES <input type="checkbox"/> NO
11. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	<input type="checkbox"/> YES <input type="checkbox"/> NO
12. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.AA.11 and VIII.AA.12 are both "NO," go to Question VIII.AA.18.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 70</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)</b>	
13. Group 1 wastewater streams are transferred to an offsite treatment facility meeting the requirements of 40 CFR § 63.138(h). <i>If the response to Question VIII.AA.13 is "NO," go to Question VIII.AA.15.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
14. The option to document in the notification of compliance status report that the wastewater will be treated in a facility meeting the requirements of 40 CFR § 63.138(h) is elected.	<input type="checkbox"/> YES <input type="checkbox"/> NO
15. Group 1 wastewater streams or residuals with a total annual average concentration of compounds in Table 8 of 40 CFR Part 63, Subpart FFFF less than 50 ppmw are transferred offsite. <i>If the response to Question VIII.AA.15 is "NO," go to Question VIII.AA.17.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
16. The transferor is demonstrating that less than 5 percent of the HAP in Table 9 of 40 CFR Part 63, Subpart FFFF is emitted from waste management units up to the activated sludge unit.	<input type="checkbox"/> YES <input type="checkbox"/> NO
17. The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	<input type="checkbox"/> YES <input type="checkbox"/> NO
18. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	<input type="checkbox"/> YES <input type="checkbox"/> NO
19. The application area includes individual drain systems that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream. <i>If the response to Question VIII.AA.19 is "NO," go to Question VIII.AA.22.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
20. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)</b>	
21. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	<input type="checkbox"/> YES <input type="checkbox"/> NO
22. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of a chemical manufacturing process unit that meets the criteria of 40 CFR § 63.100(b). <i>If the response to Question VIII.AA.22 is "NO," go to Section VIII.BB.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
23. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes (that are part of a miscellaneous chemical manufacturing process unit) that meet the criteria listed in 40 CFR § 63.149(d). <i>If the response to Question VIII.AA.23 is "NO," go to Section VIII.BB.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
24. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration of compounds in table 8 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 10,000 ppmw at any flow rate, and the total annual load of compounds in table 8 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 200 lb/yr.	<input type="checkbox"/> YES <input type="checkbox"/> NO
25. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration of compounds in table 8 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 1,000 ppmw, and the annual average flow rate is greater than or equal to 1 liter per minute.	<input type="checkbox"/> YES <input type="checkbox"/> NO
26. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of a chemical manufacturing process unit that is subject to the new source requirements of 40 CFR § 63.2445(a); and the equipment conveys water with a combined total annual average concentration of compounds in tables 8 and 9 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 30,000 ppmw, and the combined total annual load of compounds in tables 8 and 9 to this subpart is greater than or equal to 1 tpy.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)</b>	
<b>BB. Subpart GGGG - National Emission Standards for Hazardous Air Pollutants for: Solvent Extractions for Vegetable Oil Production.</b>	
1. The application area includes a vegetable oil production process that: is by itself a major source of HAP emissions or, is collocated within a plant site with other sources that are individually or collectively a major source of HAP emissions.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>CC. Subpart GGGGG - National Emission Standards for Hazardous Air Pollutants: Site Remediation</b>	
1. The application area includes a facility at which a site remediation is conducted. <i>If the answer to Question VIII.CC.1 is "NO," go to Section VIII.DD.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area is located at a site that is a major source of HAP. <i>If the answer to Question VIII.CC.2 is "NO," go to Section VIII.DD.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. All site remediation's qualify for one of the exemptions contained in 40 CFR § 63.7881(b)(1) through (6). <i>If the answer to Question VIII.CC.3 is "YES," go to Section VIII.DD.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. Prior to beginning site remediation activities it was determined that the total quantity of HAP listed in Table 1 of Subpart GGGGG that will be removed during all site remediations will be less than 1 Mg/yr. <i>If the answer to Question VIII.CC.4 is "YES," go to Section VIII.DD.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The site remediation will be completed within 30 consecutive calendar days.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. No site remediation will exceed 30 consecutive calendar days. <i>If the answer to Question VIII.CC.6 is "YES," go to Section VIII.DD.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. Site remediation materials subject to 40 CFR Part 63, Subpart GGGGG are transferred from the application area to an off-site facility.	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. All site remediation materials subject to 40 CFR Part 63, Subpart GGGGG are transferred from the application area to an off-site facility. <i>If the answer to Question VIII.CC.8 is "YES," go to Section VIII.DD.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>CC. Subpart GGGGG - National Emission Standards for Hazardous Air Pollutants: Site Remediation (continued)</b>	
9. The application area includes containers that manage site remediation materials subject to 40 CFR Part 63, Subpart GGGGG. <i>If the response to Question VIII.CC.9 is "NO," go to Question VIII.CC.14.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The application area includes containers using Container Level 1 controls as specified in 40 CFR § 63.922(b).	<input type="checkbox"/> YES <input type="checkbox"/> NO
11. The application area includes containers with a capacity greater than 0.46 m <sup>3</sup> that meet the requirements of 40 CFR § 63.7900(b)(3)(i) and (ii).	<input type="checkbox"/> YES <input type="checkbox"/> NO
12. The application area includes containers using Container Level 2 controls as specified in 40 CFR § 63.923(b).	<input type="checkbox"/> YES <input type="checkbox"/> NO
13. The application area includes containers using Container Level 3 controls as specified in 40 CFR § 63.924(b).	<input type="checkbox"/> YES <input type="checkbox"/> NO
14. The application area includes individual drain systems complying with the requirements of 40 CFR § 63.962.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>DD. Subpart YYYYY - National Emission Standards for Hazardous Air Pollutants for Area/Sources: Electric Arc Furnace Steelmaking Facilities</b>	
1. The application area includes an electric arc furnace (EAF) steelmaking facility, and the site is an area source of hazardous air pollutant (HAP) emissions. <i>If the response to Question VIII.DD.1 is "NO," go to Section VIII.EE.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The EAF steelmaking facility is a research and development facility. <i>If the response to Question VIII.DD.2 is "YES," go to Section VIII.EE.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. Metallic scrap is utilized in the EAF.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. Scrap containing motor vehicle scrap is utilized in the EAF.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. Scrap not containing motor vehicle scrap is utilized in the EAF.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>EE. Subpart BBBBBBB - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities</b>	
1. The application area is located at a site that is an area source of HAPs. <i>If the answer to Question EE.1 is "NO," go to Section VIII.FF.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area includes a pipeline breakout station, as defined in 40 CFR Part 63, Subpart BBBBBBB, not subject to the control requirements of 40 CFR Part 63, Subpart R.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area includes a pipeline pumping station as defined in 40 CFR Part 63, Subpart BBBBBBB.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
4. The application area includes a bulk gasoline plant as defined in 40 CFR Part 63, Subpart BBBBBBB. <i>If the answer to Question VIII.EE.4 is "NO," go to Question VIII.EE.6.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
5. The bulk gasoline plant was operating, prior to January 10, 2010, in compliance with an enforceable State, local or tribal rule or permit that requires submerged fill as specified in 40 CFR § 63.11086(a).	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes a bulk gasoline terminal, as defined in 40 CFR Part 63, Subpart BBBBBBB, not subject to the control requirements of 40 CFR Part 63, Subpart R or Subpart CC. <i>If the answer to Question VIII.EE.6 is "NO," go to Section VIII.FF.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
7. The bulk gasoline terminal has throughput of less than 250,000 gallons per day. <i>If the answer to Question VIII.EE.7 is "YES," go to Section VIII.FF.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. The bulk gasoline terminal loads gasoline into gasoline cargo tanks other than railcar cargo tanks.	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. The bulk gasoline terminal loads gasoline into railcar cargo tanks. <i>If the answer to Question VIII.EE.9 is "NO," go to Section VIII.FF.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The bulk gasoline terminal loads gasoline into railcar cargo tanks which do not collect vapors from a vapor balance system.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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<b>Form OP-REQ1: Page 75</b>	
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>EE. Subpart BBBBBBB - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities (continued)</b>	
11. The bulk gasoline terminal loads gasoline into railcar cargo tanks which collect vapors from a vapor balance system and that system complies with a Federal, State, local, tribal rule or permit.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>FF. Subpart CCCCCC - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities</b>	
◆ 1. The application area is located at a site that is an area source of hazardous air pollutants. <i>If the answer to Question VIII.FF.1 is "NO," go to Section VIII.GG.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆ 2. The application area includes at least one gasoline dispensing facility as defined in 40 CFR § 63.11132. <i>If the answer to Question VIII.FF.2 is "NO," go to Section VIII.GG.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆ 3. The application area includes at least one gasoline dispensing facility with a monthly throughput of less than 10,000 gallons.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 4. The application area includes at least one gasoline dispensing facility where gasoline is dispensed from a fixed gasoline storage tank into a portable gasoline tank for the on-site delivery and subsequent dispensing into other gasoline-fueled equipment.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>GG. Recently Promulgated 40 CFR Part 63 Subparts</b>	
◆ 1. The application area is subject to one or more promulgated 40 CFR Part 63 subparts not addressed on this form. <i>If the response to Question VIII.GG.1 is "NO," go to Section IX. A list of promulgated 40 CFR Part 63 subparts not otherwise addressed on OP-REQ1 is included in the instructions.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆ 2. Provide the Subpart designation (i.e. Subpart EEE) in the space provided below.	

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<b>Form OP-REQ1: Page 76</b>	
<b>IX. Title 40 Code of Federal Regulations Part 68 (40 CFR Part 68) - Chemical Accident Prevention Provisions</b>	
<b>A. Applicability</b>	
◆ 1. The application area contains processes subject to 40 CFR Part 68, Chemical Accident Prevention Provisions, and specified in 40 CFR § 68.10.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>X. Title 40 Code of Federal Regulations Part 82 (40 CFR Part 82) - Protection of Stratospheric Ozone</b>	
<b>A. Subpart A - Production and Consumption Controls</b>	
◆ 1. The application area is located at a site that produces, transforms, destroys, imports, or exports a controlled substance or product.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
<b>B. Subpart B - Servicing of Motor Vehicle Air Conditioners</b>	
◆ 1. Servicing, maintenance, and/or repair of fleet vehicle air conditioning systems using ozone-depleting refrigerants is conducted in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>C. Subpart C - Ban on Nonessential Products Containing Class I Substances and Ban on Nonessential Products Containing or Manufactured with Class II Substances</b>	
◆ 1. The application area sells or distributes one or more nonessential products (which release a Class I or Class II substance) that are subject to 40 CFR Part 82, Subpart C.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
<b>D. Subpart D - Federal Procurement</b>	
◆ 1. The application area is owned/operated by a department, agency, or instrumentality of the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
<b>E. Subpart E - The Labeling of Products Using Ozone Depleting Substances</b>	
◆ 1. The application area includes containers in which a Class I or Class II substance is stored or transported prior to the sale of the Class I or Class II substance to the ultimate consumer.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
◆ 2. The application area is a manufacturer, importer, wholesaler, distributor, or retailer of products containing a Class I or Class II substance.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
◆ 3. The application area is a manufacturer, importer, wholesaler, distributor, or retailer of products manufactured with a process that uses a Class I or Class II substance.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A

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<b>Form OP-REQ1: Page 77</b>	
<b>X. Title 40 Code of Federal Regulations Part 82 (40 CFR Part 82) - Protection of Stratospheric Ozone (continued)</b>	
<b>F. Subpart F - Recycling and Emissions Reduction</b>	
◆	1. Servicing, maintenance, and/or repair on refrigeration and non-motor vehicle air condition appliances using ozone-depleting refrigerants or non-exempt substitutes is conducted in the application area. <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
◆	2. Disposal of appliances (including motor vehicle air conditioners) or refrigerant or non-exempt substitute reclamation occurs in the application area. <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A</span>
◆	3. The application area manufactures appliances or refrigerant recycling and recovery equipment. <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A</span>
<b>G. Subpart G - Significant New Alternatives Policy Program</b>	
◆	1. The application area manufactures, formulates, or creates chemicals, product substitutes, or alternative manufacturing processes that are intended for use as a replacement for a Class I or Class II compound. <i>If the response to Question X.G.1 is "NO" or "N/A," go to Section X.H.</i> <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A</span>
◆	2. All substitutes produced by the application area meet one or more of the exemptions in 40 CFR § 82.176(b)(1) - (7). <span style="float: right;"><input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A</span>
<b>H. Subpart H -Halon Emissions Reduction</b>	
◆	1. Testing, servicing, maintaining, repairing, or disposing of equipment containing halons is conducted in the application area. <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A</span>
◆	2. Disposal of halons or manufacturing of halon blends is conducted in the application area. <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A</span>
<b>XI. Miscellaneous</b>	
<b>A. Requirements Reference Tables (RRT) and Flowcharts</b>	
	1. The application area contains units that are potentially subject to a regulation for which the TCEQ has not developed an RRT and flowchart. <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>

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<b>Form OP-REQ1: Page 78</b>	
<b>XI. Miscellaneous (continued)</b>	
<b>B. Forms</b>	
◆ 1. The application area contains units that are potentially subject to a regulation for which the TCEQ has not developed a unit attribute form. <i>If the response to Question XI.B.1 is "NO" or "N/A," go to Section XI.C.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
◆ 2. Provide the Part and Subpart designation for the federal rule(s) or the Chapter, Subchapter, and Division designation for the State regulation(s) in the space provided below.	
<b>C. Emission Limitation Certifications</b>	
◆ 1. The application area includes units for which federally enforceable emission limitations have been established by certification.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
<b>D. Alternative Means of Control, Alternative Emission Limitation or Standard, or Equivalent Requirements</b>	
1. The application area is located at a site that is subject to a site-specific requirement of the state implementation plan (SIP).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes units located at the site that are subject to a site-specific requirement of the SIP.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area includes units which demonstrate compliance by using an alternative means of control, alternative emission limitation or standard or equivalent requirements approved by the EPA Administrator. <i>If the response to Question XI.D.3 is "YES," please include a copy of the approval document with the application.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
4. The application area includes units which demonstrate compliance by using an alternative means of control, alternative emission limitation or standard or equivalent requirements approved by the TCEQ Executive Director. <i>If the response to Question XI.D.4 is "YES," please include a copy of the approval document with the application.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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<b>Form OP-REQ1: Page 79</b>	
<b>XI. Miscellaneous (continued)</b>	
<b>E. Title IV - Acid Rain Program</b>	
1. The application area includes emission units subject to the Acid Rain Program (ARP), including the Opt-In Program.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes emission units qualifying for the new unit exemption under 40 CFR § 72.7.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area includes emission units qualifying for the retired unit exemption under 40 CFR § 72.8.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>F. 40 CFR Part 97, Subpart EEEEE - Cross-State Air Pollution Rule (CSAPR) NO<sub>x</sub> Ozone Season Group 2 Trading Program</b>	
1. The application area includes emission units subject to the requirements of the CSAPR NO <sub>x</sub> Ozone Season Group 2 Trading Program. <i>If the response to Question XI.F.1 is "NO," go to Question XI.F.7.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart H for NO <sub>x</sub> and heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes gas or oil-fired units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart H for NO <sub>x</sub> , and the monitoring requirements of 40 CFR Part 75, Appendix D for heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes gas or oil-fired peaking units that are complying with the monitoring requirements of 40 CFR Part 75, Appendix E for NO <sub>x</sub> , and the monitoring requirements of 40 CFR Part 75, Appendix D for heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes gas or oil-fired units that are complying with the Low Mass Emissions monitoring requirements of 40 CFR § 75.19 for NO <sub>x</sub> and heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes units that are complying with EPA-approved alternative monitoring system requirements of 40 CFR Part 75, Subpart E for NO <sub>x</sub> and heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes emission units that qualify for the CSAPR NO <sub>x</sub> Ozone Season Group 2 retired unit exemption.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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<b>Form OP-REQ1: Page 80</b>	
<b>XI. Miscellaneous (continued)</b>	
<b>G. 40 CFR Part 97, Subpart FFFFF - Texas SO<sub>2</sub> Trading Program</b>	
1. The application area includes emission units complying with the requirements of the Texas SO <sub>2</sub> Trading Program. <i>If the response to Question XI.G.1 is "NO," go to Question XI.G.6.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart B for SO <sub>2</sub> and 40 CFR Part 75, Subpart H for heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes gas or oil-fired units that are complying with the monitoring requirements of 40 CFR Part 75, Appendix D for SO <sub>2</sub> and heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes gas or oil-fired units that are complying with the Low Mass Emissions monitoring requirements of 40 CFR § 75.19 for SO <sub>2</sub> and heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes units that are complying with EPA-approved alternative monitoring system requirements of 40 CFR Part 75, Subpart E for SO <sub>2</sub> and heat input.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes emission units that qualify for the Texas SO <sub>2</sub> Trading Program retired unit exemption.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>H. Permit Shield (SOP Applicants Only)</b>	
1. A permit shield for negative applicability entries on Form OP-REQ2 (Negative Applicable Requirement Determinations) is being requested or already exists in the permit.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 81</b>		
<b>XI. Miscellaneous (continued)</b>		
<b>I. GOP Type (Complete this section for GOP applications only)</b>		
◆	1. The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under GOP No. 511 - Oil and Gas General Operating Permit for 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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	2. The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under GOP No. 512 - Oil and Gas General Operating Permit for Gregg, Nueces, and Victoria Counties.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	3. The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under GOP No. 513 - Oil and Gas General Operating Permit for Aransas, Bexar, Calhoun, Matagorda, San Patricio, and Travis Counties.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	4. The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under GOP No. 514 - Oil and Gas General Operating Permit for All Texas Counties Except Aransas, Bexar, Brazoria, Calhoun, Chambers, Collin, Dallas, Denton, El Paso, Ellis, Fort Bend, Galveston, Gregg, Hardin, Harris, Jefferson, Johnson, Kaufman, Liberty, Matagorda, Montgomery, Nueces, Orange, Parker, Rockwall, San Patricio, Tarrant, Travis, Victoria, Waller, and Wise County.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	5. The application area is applying for initial issuance, revision, or renewal of a solid waste landfill general operating permit under GOP No. 517 - Municipal Solid Waste Landfill general operating permit.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>J. Title 30 TAC Chapter 101, Subchapter H</b>		
◆	1. The application area is located in a nonattainment area. <i>If the response to Question XI.J.1 is "NO," go to question XI.J.3.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆	2. The applicant has or will generate emission reductions to be credited in the TCEQ Emissions Banking and Trading Program.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
◆	3. The applicant has or will generate discrete emission reductions to be credited in the TCEQ Emissions Banking and Trading Program.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A

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<b>Form OP-REQ1: Page 82</b>		
<b>XI. Miscellaneous (continued)</b>		
<b>J. Title 30 TAC Chapter 101, Subchapter H (continued)</b>		
◆	4. The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area where the facilities have a collective uncontrolled design capacity to emit 10 tpy or more of NO <sub>x</sub> .	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆	5. The application area includes an electric generating facility permitted under 30 TAC Chapter 116, Subchapter I.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	6. The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area and the site has a potential to emit more than 10 tpy of highly-reactive volatile organic compounds (HRVOC) from facilities covered under 30 TAC Chapter 115, Subchapter H, Divisions 1 and 2.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	7. The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area, the site has a potential to emit 10 tpy or less of HRVOC from covered facilities and the applicant is opting to comply with the requirements of 30 TAC Chapter 101, Subchapter H, Division 6, Highly Reactive VOC Emissions Cap and Trade Program.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>K. Periodic Monitoring</b>		
◆	1. The applicant or permit holder is submitting at least one periodic monitoring proposal described on Form OP-MON in this application.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	2. The permit currently contains at least one periodic monitoring requirement. <i>If the responses to Questions XI.K.1 and XI.K.2 are both "NO," go to Section XI.L.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	3. All periodic monitoring requirements are being removed from the permit with this application.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO



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<b>Form OP-REQ1: Page 83</b>	
<b>XI. Miscellaneous (continued)</b>	
<b>L. Compliance Assurance Monitoring</b>	
◆	<div style="display: flex; justify-content: space-between;"> <div style="width: 75%;"> <p>1. The application area includes at least one unit that does not meet the CAM exemptions in 40 CFR § 64.2(b) for all applicable requirements that it is subject to, and the unit has a pre-control device potential to emit greater than or equal to the amount in tons per year required in a site classified as a major source.</p> <p><i>If the response to Question XI.L.1 is "NO," go to Section XI.M.</i></p> </div> <div style="width: 20%; text-align: right;"> <input checked="" type="checkbox"/> YES   <input type="checkbox"/> NO </div> </div>
◆	<div style="display: flex; justify-content: space-between;"> <div style="width: 75%;"> <p>2. The unit or units defined by XI.L.1 are using a control device to comply with an applicable requirement.</p> <p><i>If the response to Question XI.L.2 is "NO," go to Section XI.M.</i></p> </div> <div style="width: 20%; text-align: right;"> <input checked="" type="checkbox"/> YES   <input type="checkbox"/> NO </div> </div>
◆	<div style="display: flex; justify-content: space-between;"> <div style="width: 75%;"> <p>3. The permit holder has submitted a CAM proposal on Form OP-MON in a previous application.</p> </div> <div style="width: 20%; text-align: right;"> <input checked="" type="checkbox"/> YES   <input type="checkbox"/> NO </div> </div>
◆	<div style="display: flex; justify-content: space-between;"> <div style="width: 75%;"> <p>4. The owner/operator or permit holder is submitting a CAM proposal on Form OP-MON according to the deadlines for submittals in 40 CFR § 64.5 in this application.</p> <p><i>If the responses to Questions XI.L.3 and XI.L.4 are both "NO," go to Section XI.M.</i></p> </div> <div style="width: 20%; text-align: right;"> <input type="checkbox"/> YES   <input checked="" type="checkbox"/> NO </div> </div>
	<div style="display: flex; justify-content: space-between;"> <div style="width: 75%;"> <p>5. The owner/operator or permit holder is submitting a CAM implementation plan and schedule to be incorporated as enforceable conditions in the permit.</p> </div> <div style="width: 20%; text-align: right;"> <input type="checkbox"/> YES   <input checked="" type="checkbox"/> NO </div> </div>
	<p>6. Provide the unit identification numbers for the units for which the applicant is submitting a CAM implementation plan and schedule in the space below.</p> <p>OX-1, OX-2, OX-3</p>
◆	<div style="display: flex; justify-content: space-between;"> <div style="width: 75%;"> <p>7. At least one unit defined by XI.L.1 and XI.L.2 is using a CEMS, COMS or PEMS meeting the requirements of 40 CFR § 64.3(d)(2).</p> </div> <div style="width: 20%; text-align: right;"> <input type="checkbox"/> YES   <input checked="" type="checkbox"/> NO </div> </div>
◆	<div style="display: flex; justify-content: space-between;"> <div style="width: 75%;"> <p>8. All units defined by XI.L.1 and XI.L.2 are using a CEMS, COMS or PEMS meeting the requirements of 40 CFR § 64.3(d)(2).</p> <p><i>If the response to Question XI.L.8 is "YES," go to Section XI.M.</i></p> </div> <div style="width: 20%; text-align: right;"> <input type="checkbox"/> YES   <input checked="" type="checkbox"/> NO </div> </div>

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<b>Form OP-REQ1: Page 84</b>		
<b>XI. Miscellaneous (continued)</b>		
<b>L. Compliance Assurance Monitoring (continued)</b>		
◆	9. At least one of the CAM proposals as described by question XI.L.3 or XI.L.4 addresses particulate matter, and the emission unit has a capture system as defined in 40 CFR §64.1.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	10. At least one of the CAM proposals as described by question XI.L.3 or XI.L.4 addresses VOC, and the emission unit has a capture system as defined in 40 CFR §64.1.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆	11. At least one of the CAM proposals as described by question XI.L.3 or XI.L.4 addresses a regulated pollutant other than particulate matter or VOC, and the emission unit has a capture system as defined in 40 CFR §64.1.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	12. The control device in the CAM proposal as described by question XI.L.3 or XI.L.4 has a bypass.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>M. Title 30 TAC Chapter 113, Subchapter D, Division 5 - Emission Guidelines and Compliance Times</b>		
◆	1. The application area includes at least one air curtain incinerator that commenced construction on or before December 9, 2004. <i>If the response to Question XI.M.1 is "NO," or "N/A," go to Section XII.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
◆	2. All air curtain incinerators constructed on or before December 9, 2004 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>XII. New Source Review (NSR) Authorizations</b>		
<b>A. Waste Permits with Air Addendum</b>		
◆	1. The application area includes a Municipal Solid Waste Permit or an Industrial Hazardous Waste with an Air Addendum. <i>If the response to XII.A.1 is "YES," include the waste permit numbers and issuance date in Section XII.J.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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*For SOP applications, answer ALL questions unless otherwise directed.*

◆ *For GOP applications, answer ONLY these questions unless otherwise directed.*

<b>Form OP-REQ1: Page 85</b>		
<b>XII. New Source Review (NSR) Authorizations (continued)</b>		
<b>B. Air Quality Standard Permits</b>		
◆	1. The application area includes at least one Air Quality Standard Permit NSR authorization.  <i>If the response to XII.B.1 is "NO," go to Section XII.C. If the response to XII.B.1 is "YES," be sure to include the standard permit's registration numbers in Section XII.H and answer XII.B.2 - B.16 as appropriate.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	2. The application area includes at least one "State Pollution Control Project" Air Quality Standard Permit NSR authorization under 30 TAC § 116.617.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	3. The application area includes at least one non-rule Air Quality Standard Permit for Pollution Control Projects NSR authorization.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	4. The application area includes at least one "Installation and/or Modification of Oil and Gas Facilities" Air Quality Standard Permit NSR authorization under 30 TAC § 116.620.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	5. The application area includes at least one non-rule Air Quality Standard Permit for Oil and Gas Handling and Production Facilities NSR authorization.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	6. The application area includes at least one "Municipal Solid Waste Landfill" Air Quality Standard Permit NSR authorization under 30 TAC § 116.621.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	7. The application area includes at least one "Municipal Solid Waste Landfill Facilities and Transfer Stations" Standard Permit authorization under 30 TAC Chapter 330, Subchapter U.	<input type="checkbox"/> YES <input type="checkbox"/> NO
	8. The application area includes at least one "Concrete Batch Plant" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	9. The application area includes at least one "Concrete Batch Plant with Enhanced Controls" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	10. The application area includes at least one "Hot Mix Asphalt Plant" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> YES <input type="checkbox"/> NO

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<b>Form OP-REQ1: Page 86</b>	
<b>XII. New Source Review (NSR) Authorizations (continued)</b>	
<b>B. Air Quality Standard Permits (continued)</b>	
◆ 11. The application area includes at least one "Rock Crusher" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 12. The application area includes at least one "Electric Generating Unit" Air Quality Standard Permit NSR authorization. <i>If the response to XII.B.12 is "NO," go to Question XII.B.15.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 13. For purposes of "Electric Generating Unit" Air Quality Standard Permit, the application area is located in the East Texas Region.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 14. For purposes of "Electric Generating Unit" Air Quality Standard Permit, the application area is located in the West Texas Region.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 15. The application area includes at least one "Boiler" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 16. The application area includes at least one "Sawmill" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>C. Flexible Permits</b>	
1. The application area includes at least one Flexible Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>D. Multiple Plant Permits</b>	
1. The application area includes at least one Multi-Plant Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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**XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)**

**E. PSD Permits and PSD Major Pollutants**

PSD Permit No.:	Issuance Date:	Pollutant(s):
PSD Permit No.:	Issuance Date:	Pollutant(s):
PSD Permit No.:	Issuance Date:	Pollutant(s):
PSD Permit No.:	Issuance Date:	Pollutant(s):

*If PSD Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: [www.tceq.texas.gov/permitting/air/titlev/site/site\\_experts.html](http://www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html).*

**F. Nonattainment (NA) Permits and NA Major Pollutants**

NA Permit No.:	Issuance Date:	Pollutant(s):
NA Permit No.:	Issuance Date:	Pollutant(s):
NA Permit No.:	Issuance Date:	Pollutant(s):
NA Permit No.:	Issuance Date:	Pollutant(s):

*If NA Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: [www.tceq.texas.gov/permitting/air/titlev/site/site\\_experts.html](http://www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html).*

**G. NSR Authorizations with FCAA § 112(g) Requirements**

NSR Permit No.: 108176	Issuance Date: 08/19/2022	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:

◆ **H. Title 30 TAC Chapter 116 Permits, Special Permits, Standard Permits, Other Authorizations (Other Than Permits By Rule, PSD Permits, NA Permits) for the Application Area**

Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:

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<b>Form OP-REQ1: Page 88</b>	
<b>XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)</b>	
◆ <b>I. Permits by Rule (30 TAC Chapter 106) for the Application Area</b>	
<i>A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.</i>	
PBR No.: 106.183	Version No./Date: 09/04/2000
PBR No.: 106.472	Version No./Date: 09/04/2000
PBR No.: 106.511	Version No./Date: 09/04/2000
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
◆ <b>J. Municipal Solid Waste and Industrial Hazardous Waste Permits With an Air Addendum</b>	
Permit No.:	Issuance Date:
Permit No.:	Issuance Date:
Permit No.:	Issuance Date:
Permit No.:	Issuance Date:

**Form OP-REQ2**  
**Negative Applicable Requirement Determinations**  
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Date	Permit Number	Regulated Entity No.
4/4/2023	TBA	RN102886819

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded	Negative Applicability/Superseded Requirement Reason
		B-1	OP-REQ2	30 TAC Chapter 111, Incineration	§111.121	Unit does not meet definition of an incinerator as defined in §101.1.
		B-1	OP-REQ2	30 TAC Chapter 113, Hospital/Medical/Infectious Waste Incinerators	§113.2071	Unit is not a designated facility with existing hospital/medical/infectious waste incinerator (HMIWI) units.
		B-1	OP-REQ2	40 CFR Part 60, Subpart D	§60.40(a)	Unit does not have a heat input rate of more than 73 megawatts (MW; 250 MMBtu/hr).
		B-1	OP-REQ2	40 CFR Part 60, Subpart Da	§60.40a(a)	Unit is not an electric utility steam generating unit.
		B-1	OP-REQ2	40 CFR Part 60, Subpart Db	§60.40b(a)	Unit is not a steam generating unit with a heat input capacity > 29 MW (100 MMBtu/hr).
		B-1	OP-REQ2	40 CFR Part 60, Subpart Dc	§60.40c(a)	Unit is not a steam generating unit with a heat input capacity > than 2.9 MW (10 MMBtu/hr) and < 29 MW (100MMBtu/hr).
		B-1	OP-REQ2	40 CFR Part 60, Subpart TTTT	§60.5509(a)	Unit is not a steam generating unit, integrated gasification combined cycle (IGCC) facility, or a stationary combustion turbine that commenced construction after 1/8/14; or commenced modification or reconstruction after 6/18/14.
		B-1	OP-REQ2	40 CFR Part 63, Subpart EEE	§63.1200	Unit does not meet definition of a hazardous waste incinerator as defined in 40 CFR 63.1201(a).
		B-1	OP-REQ2	40 CFR Part 63, Subpart DDDDD	§63.7485	Unit is not located at and is not part of a major source of HAPs.
		B-1	OP-REQ2	40 CFR Part 63, Subpart UUUUU	§63.9981	Unit is not a coal- or oil-fired electric utility steam generating unit as defined in § 63.10042.
		DIESEL1	OP-REQ2	30 TAC Chapter 115, Storage of VOCs	§115.111(a)(8)	Unit has a capacity less than or equal to 1,000 gal (3,785 L).
		DIESEL1	OP-REQ2	40 CFR Part 60, Subpart K	§60.110(a)	Unit does not have a capacity greater than or equal to 40,000 gal (151,412 L).

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Date	Permit Number	Regulated Entity No.
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Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded	Negative Applicability/Superseded Requirement Reason
		DIESEL1	OP-REQ2	40 CFR Part 60, Subpart Ka	§60.110a(a)	Unit does not have a capacity greater than or equal to 40,000 gal (151,412 L).
		DIESEL1	OP-REQ2	40 CFR Part 60, Subpart Kb	§60.110b(a)	Unit does not have a capacity greater than or equal to 19,800 gal (75 cubic meters).
		DIESEL1	OP-REQ2	40 CFR Part 61, Subpart Y	§61.270(a)	Unit does not store benzene.
		DIESEL1	OP-REQ2	40 CFR Part 63, Subpart OO	§63.900	Another subpart of 40 CFR Parts 60, 61, or 63 does not reference the use of this Subpart for air emission control.
		DIESEL2	OP-REQ2	30 TAC Chapter 115, Storage of VOCs	§115.111(a)(8)	Unit has a capacity less than or equal to 1,000 gal (3,785 L).
		DIESEL2	OP-REQ2	40 CFR Part 60, Subpart K	§60.110(a)	Unit does not have a capacity greater than or equal to 40,000 gal (151,412 L).
		DIESEL2	OP-REQ2	40 CFR Part 60, Subpart Ka	§60.110a(a)	Unit does not have a capacity greater than or equal to 40,000 gal (151,412 L).
		DIESEL2	OP-REQ2	40 CFR Part 60, Subpart Kb	§60.110b(a)	Unit does not have a capacity greater than or equal to 19,800 gal (75 cubic meters).
		DIESEL2	OP-REQ2	40 CFR Part 61, Subpart Y	§61.270(a)	Unit does not store benzene.
		DIESEL2	OP-REQ2	40 CFR Part 63, Subpart OO	§63.900	Another subpart of 40 CFR Parts 60, 61, or 63 does not reference the use of this Subpart for air emission control.
		EFP-1	OP-UA2	30 TAC Chapter 117, East Texas Combustion	§117.3300	Unit is not located in a county subject to this requirement.
		EFP-1	OP-UA2	40 CFR Part 60, Subpart JJJJ	§60.4230(a)(4)	Unit is not a stationary spark ignition internal combustion engine.
		GEN-1	OP-REQ2	30 TAC Chapter 117, East Texas Combustion	§117.3300	Unit is not located in a county subject to this requirement.
		GEN-1	OP-REQ2	40 CFR Part 60, Subpart IIII	§60.4200(a)(2)	Unit is not a stationary compression ignition internal combustion engine.
		GEN-1	OP-REQ2	40 CFR Part 60, Subpart JJJJ	§60.4230(a)(4)	Unit commenced construction or modification/reconstruction before 6/12/06.



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Date	Permit Number	Regulated Entity No.
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Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded	Negative Applicability/Superseded Requirement Reason
		GEN-1	OP-REQ2	40 CFR Part 63, Subpart ZZZZ	§63.6585(f)	Unit meets criteria of the listed emergency stationary RICE exempt from requirement.
		GRP-OX	OP-REQ2	30 TAC Chapter 111, Incineration	§111.121	Units are not incinerators as defined in §101.1.
		GRP-OX	OP-REQ2	30 TAC Chapter 113, Hospital/Medical/Infectious Waste Incinerators	§113.2071	Unit is not a designated facility with existing hospital/medical/infectious waste incinerator (HMIWI) units.
		GRP-OX	OP-REQ2	30 TAC Chapter 115, Vent Gas Control	§115.127(a)(7)	All VOCs in the vent gas stream originate from another source which is subject to a different Division within 30 TAC Chapter 115 and vent gas stream does not contain any highly reactive VOCs.
		GRP-OX	OP-REQ2	40 CFR Part 60, Subpart E	§60.50(a)	Units are not incinerators of more than 45 metric tons per day charging rate (50 tons/day).
		GRP-OX	OP-REQ2	40 CFR Part 60, Subpart O	§60.150(a)	Units are not incinerators burning waste containing sewage sludge.
		GRP-OX	OP-REQ2	40 CFR Part 61, Subpart C	§61.30	Units are not extraction plants, ceramic plants, foundries, incinerators, and propellant plants which process beryllium ore, beryllium, beryllium oxide, beryllium alloys, or beryllium-containing waste; and do not process beryllium ore, metal, oxide, alloys, or beryllium-containing waste.
		GRP-OX	OP-REQ2	40 CFR Part 61, Subpart E	§61.50	Units do not process mercury ore, use mercury chlor-alkali cells to produce chlorine gas and/or alkali metal hydroxide, or incinerate or dry wastewater treatment plant sludge.
		GRP-OX	OP-REQ2	40 CFR Part 63, Subpart EEE	§63.1200	Units are not hazardous waste combustors.
		GRP-DRYR	OP-REQ2	30 TAC Chapter 111, Incineration	§111.121	Units are not incinerators as defined in §101.1 used to burn waste.

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Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded	Negative Applicability/Superseded Requirement Reason
		GRP-DRYR	OP-REQ2	30 TAC Chapter 112, Control of Sulfur Compounds	§112.9	Units are not liquid fuel-fired heaters or furnaces.
		GRP-DRYR	OP-REQ2	30 TAC Chapter 117, Multi-Region Combustion Control	§117.3100	Facility does not have cement kilns on site.
		GRP-DRYR	OP-REQ2	40 CFR Part 60, Subpart PP	§60.420(a)	Facility is not an ammonium sulfate dryer within the ammonium sulfate industry.
		GRP-DRYR	OP-REQ2	40 CFR Part 61, Subpart E	§61.50	Units do not process mercury ore, use mercury chlor-alkali cells to produce chlorine gas and/or alkali metal hydroxide, or incinerate or dry wastewater treatment plant sludge.
		GRP-DRYR	OP-REQ2	40 CFR Part 61, Subpart K	§61.120	Facility is not a calciner or nodulizing kiln at an elemental phosphorous plant.
		GRP-DRYR	OP-REQ2	40 CFR Part 63, Subpart EEE	§63.1200	Units are not hazardous waste combustors.
		GRP-DRYR	OP-REQ2	40 CFR Part 63, Subpart DDDDD	§63.7485	Units are not boiler or process heaters as defined in §63.7485 at a major source of HAPs.
		GRP-DRYR	OP-REQ2	40 CFR Part 63, Subpart JJJJJ	§63.8380	Site is not a brick or structural clay products manufacturing facility.
		GRP-PRNT	OP-UA22	30 TAC Chapter 115, Offset Lithographic Printing	§115.440(a)	Offset lithographic printing press lines are not present onsite.
		GRP-PRNT	OP-UA22	40 CFR Part 60, Subpart QQ	§60.430(a)	Units are not publication rotogravure printing presses.
		GRP-PRNT	OP-UA22	40 CFR Part 60, Subpart FFF	§60.580(a)	Rotogravure printing lines are not present onsite.
		GRP-PRNT	OP-UA22	40 CFR Part 63, Subpart KK	§63.820(a)	Site is not a major source of hazardous air pollutants (HAP).
		T-1	OP-UA3	40 CFR Part 60, Subpart K	§60.110(a)	Unit does not store petroleum liquids.
		T-1	OP-UA3	40 CFR Part 60, Subpart Ka	§60.110a(a)	Unit does not store petroleum liquids.

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Date	Permit Number	Regulated Entity No.
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Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded	Negative Applicability/Superseded Requirement Reason
		T-1	OP-UA3	40 CFR Part 60, Subpart Kb	§60.110b(a)	Unit does not have a capacity greater than or equal to 19,800 gal (75 cubic meters).
		T-1	OP-UA3	40 CFR Part 61, Subpart Y	§61.270(a)	Unit does not store benzene.
		T-1	OP-UA3	40 CFR Part 63, Subpart OO	§63.900	Another subpart of 40 CFR Parts 60, 61, or 63 does not reference the use of this Subpart for air emission control.
		T-2	OP-UA3	40 CFR Part 60, Subpart K	§60.110(a)	Unit does not store petroleum liquids.
		T-2	OP-UA3	40 CFR Part 60, Subpart Ka	§60.110a(a)	Unit does not store petroleum liquids.
		T-2	OP-UA3	40 CFR Part 60, Subpart Kb	§60.110b(a)	Unit does not have a capacity greater than or equal to 19,800 gal (75 cubic meters).
		T-2	OP-UA3	40 CFR Part 61, Subpart Y	§61.270(a)	Unit does not store benzene.
		T-2	OP-UA3	40 CFR Part 63, Subpart OO	§63.900	Another subpart of 40 CFR Parts 60, 61, or 63 does not reference the use of this Subpart for air emission control.
		T-3	OP-UA3	40 CFR Part 60, Subpart K	§60.110(a)	Unit does not store petroleum liquids.
		T-3	OP-UA3	40 CFR Part 60, Subpart Ka	§60.110a(a)	Unit does not store petroleum liquids.
		T-3	OP-UA3	40 CFR Part 60, Subpart Kb	§60.110b(a)	Unit does not have a capacity greater than or equal to 19,800 gal (75 cubic meters).
		T-3	OP-UA3	40 CFR Part 61, Subpart Y	§61.270(a)	Unit does not store benzene.
		T-3	OP-UA3	40 CFR Part 63, Subpart OO	§63.900	Another subpart of 40 CFR Parts 60, 61, or 63 does not reference the use of this Subpart for air emission control.
		T-4	OP-UA3	40 CFR Part 60, Subpart K	§60.110(a)	Unit does not store petroleum liquids.
		T-4	OP-UA3	40 CFR Part 60, Subpart Ka	§60.110a(a)	Unit does not store petroleum liquids.
		T-4	OP-UA3	40 CFR Part 60, Subpart Kb	§60.110b(a)	Unit does not have a capacity greater than or equal to 19,800 gal (75 cubic meters).
		T-4	OP-UA3	40 CFR Part 61, Subpart Y	§61.270(a)	Unit does not store benzene.
		T-4	OP-UA3	40 CFR Part 63, Subpart OO	§63.900	Another subpart of 40 CFR Parts 60, 61, or 63 does not reference the use of this Subpart for air emission control.

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Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded	Negative Applicability/Superseded Requirement Reason
		WFP-1	OP-REQ2	30 TAC Chapter 117, East Texas Combustion	§117.3300	Unit is not located in a county subject to this requirement.
		WFP-1	OP-REQ2	40 CFR Part 60, Subpart IIII	§60.4200(a)(2)	Unit is not a stationary compression ignition internal combustion engine.
		WFP-1	OP-REQ2	40 CFR Part 60, Subpart JJJJ	§60.4230(a)(4)	Unit commenced construction or modification/reconstruction before 6/12/06.
		WFP-1	OP-REQ2	40 CFR Part 63, Subpart ZZZZ	§63.6585(f)	Unit meets criteria of the listed emergency stationary RICE exempt from requirement.

TCEQ-10017 (APD-ID156v2.0, Revised 07/22) Form OP-REQ2 - Negative Applicable/Superseded Requirement Determinations

This form for use by facilities subject to air quality permit requirements and  
may be revised periodically (Title V Release 10/07)

**Applicable Requirements Summary  
Form OP-REQ3 (Page 1)  
Federal Operating Permit Program**

**Table 1a: Additions**

<b>Date:</b> 04/04/2023	<b>Regulated Entity No.:</b> RN102886819	<b>Permit No.:</b>
<b>Company Name:</b> StarPak LLC	<b>Area Name:</b> StarPak	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
	EFP-1	OP-UA2	60III-01	VOC	NSPS IIII	§60.4205(c) Table 4/10, §60.4206, §60.4207(b), [G]§60.4211(a), 60.4211(c), §60.4211(f), §60.4218
	EFP-1	OP-UA2	60III-01	NOx	NSPS IIII	§60.4205(c) Table 4/10, §60.4206, §60.4207(b), [G]§60.4211(a), 60.4211(c), §60.4211(f), §60.4218
	EFP-1	OP-UA2	60III-01	PM	NSPS IIII	§60.4205(c) Table 4/28; §60.4206, §60.4207(b), [G]§60.4211(a), 60.4211(c), §60.4211(f), §60.4218
	EFP-1	OP-UA2	63ZZZZ-01	HAP	MACT ZZZZ	§63.6590(c)
	INK-ROOM	OP-UA15	R5121-01	VOC	Chapter 115	[G]§115.122(a)(4), §115.127(a)(2), §115.127(a)(2)(A)
	GRP-PRNT	OP-UA22	R5432-01	VOC	Chapter 115	§115.432(c), §115.432(c)(1), §115.432(c)(1)(C), [G]§115.432(d)
	GRP-PRNT	OP-UA22	R5432-02	VOC	Chapter 115	§115.432(c), §115.432(c)(1), §115.432(c)(1)(C), [G]§115.432(d)
	GRP-PRNT	OP-UA22	R5432-03	VOC	Chapter 115	§115.432(c), §115.432(c)(1), §115.432(c)(1)(C), [G]§115.432(d)
	SOL-CLNR	OP-UA15	R5121-01	VOC	Chapter 115	[G]§115.122(a)(4), §115.127(a)(2), §115.127(a)(2)(A)

**Applicable Requirements Summary  
Form OP-REQ3 (Page 1)  
Federal Operating Permit Program**

**Table 1a: Additions**

<b>Date:</b> 04/04/2023	<b>Regulated Entity No.:</b> RN102886819	<b>Permit No.:</b>
<b>Company Name:</b> StarPak LLC	<b>Area Name:</b> StarPak	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
	T-1	OP-UA3	R5112-01	VOC	Chapter 115	§115.111(a)(1)
	T-2	OP-UA3	R5112-01	VOC	Chapter 115	§115.111(a)(1)
	T-3	OP-UA3	R5112-01	VOC	Chapter 115	§115.111(a)(1)
	T-4	OP-UA3	R5112-01	VOC	Chapter 115	§115.111(a)(1)
	UNLOADER1	OP-UA4	R5211-01	VOC	Chapter 115	§115.212(a)(2), §115.217(a)(1), §115.214(a)(1)(B), §115.214(a)(1)(D), §115.214(a)(1)(D)(i)
	UNLOADER2	OP-UA4	R5211-01	VOC	Chapter 115	§115.212(a)(2), §115.212(a)(3), §115.212(a)(3)(A), §115.212(a)(3)(A)(i), §115.212(a)(3)(B), [G]§115.212(a)(3)(C), §115.212(a)(3)(D), §115.214(a)(1)(B), §115.214(a)(1)(C)

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program**

**Table 1b: Additions**

<b>Date:</b> 04/04/2023	<b>Regulated Entity No.:</b> RN102886819	<b>Permit No.:</b>
<b>Company Name:</b> StarPak LLC	<b>Area Name:</b> StarPak	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
	EFP-1	60III-01	VOC			[G]60.4214(d)
	EFP-1	60III-01	NOx			[G]60.4214(d)
	EFP-1	60III-01	PM			[G]60.4214(d)
	EFP-1	63ZZZ-01	HAP			
	INK-ROOM	R5121-01	VOC	[G]§115.125, §115.126(2), §115.126(3)(B)	§115.126, §115.126(2), §115.126(3), §115.126(3)(B)	
	GRP-PRINT	R5432-01	VOC	§115.435(a)(1)-(8), §115.435(a)(8)(A)(i), 115.435(c), §115.436(c), §115.436(c)(1)	§115.436(c), §115.436(c)(1), §115.436(c)(2), §115.436(c)(5), §115.436(c)(6), §115.436(c)(7)	§115.436(c)(6), §115.436(c)(7)
	GRP-PRINT	R5432-02	VOC	§115.435(a)(1)-(8), §115.435(a)(8)(A)(i), 115.435(c), §115.436(c), §115.436(c)(1)	§115.436(c), §115.436(c)(1), §115.436(c)(2), §115.436(c)(5), §115.436(c)(6), §115.436(c)(7)	§115.436(c)(6), §115.436(c)(7)
	GRP-PRINT	R5432-03	VOC	§115.435(a)(1)-(8), §115.435(a)(8)(A)(i), 115.435(c), §115.436(c), §115.436(c)(1)	§115.436(c), §115.436(c)(1), §115.436(c)(2), §115.436(c)(5), §115.436(c)(6), §115.436(c)(7)	§115.436(c)(6), §115.436(c)(7)
	SOL-CLNR	R5121-01	VOC	[G]§115.125, §115.126(2), §115.126(3)(B)	§115.126, §115.126(2), §115.126(3), §115.126(3)(B)	

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program**

**Table 1b: Additions**

<b>Date:</b> 04/04/2023	<b>Regulated Entity No.:</b> RN102886819	<b>Permit No.:</b>
<b>Company Name:</b> StarPak LLC	<b>Area Name:</b> StarPak	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
	T-1	R5112-01	VOC	[G]§115.117	§115.118(a)(1), §115.118(a)(5), §115.118 (a)(7)	
	T-2	R5112-01	VOC	[G]§115.117	§115.118(a)(1), §115.118(a)(5), §115.118 (a)(7)	
	T-3	R5112-01	VOC	[G]§115.117	§115.118(a)(1), §115.118(a)(5), §115.118 (a)(7)	
	T-4	R5112-01	VOC	[G]§115.117	§115.118(a)(1), §115.118(a)(5), §115.118 (a)(7)	
	UNLOADER1	R5211-01	VOC	§115.214(a)(1)(A) §115.214(a)(1)(A)(i) §115.215, §115.215(4)	§115.216 §115.216(2) §115.216(3)(B)	
	UNLOADER2	R5211-01	VOC	§115.212(a)(3)(B), §115.214(a)(1)(A), §115.214(a)(1)(A)(i), §115.214(a)(1)(A)(ii), §115.214(a)(1)(A)(iii)	§115.216, §115.216(3)(A), §115.216(3)(A)(i), §115.216 (3)(A)(iii)	



# Appendix C

## TCEQ OP-UA Forms

**Stationary Reciprocating Internal Combustion Engine Attributes**

**Form OP-UA2 (Page 4)**

**Federal Operating Permit Program**

**Table 2a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)**

**Subpart ZZZZ: National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines  
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
04/04/2023		RN102886819

Unit ID No.	SOP/GOP Index No.	HAP Source	Brake HP	Construction/ Reconstruction Date	Nonindustrial Emergency Engine	Service Type	Stationary RICE Type
EFP-1	63ZZZZ-01	AREA	300-500	06+		EMER-A	CI

**Stationary Reciprocating Internal Combustion Engine Attributes  
Form OP-UA2 (Page 10)**

**Federal Operating Permit Program**

**Table 5a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**

**Subpart IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines  
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
04/04/2023		RN102886819

Unit ID No.	SOP/GOP Index No.	Applicability Date	Exemptions	Service	Commencing	Manufacture Date
EFP-1	60IIII-01	2005+	NONE	FIRE	CON	0706+

**Stationary Reciprocating Internal Combustion Engine Attributes  
Form OP-UA2 (Page 11)**

**Federal Operating Permit Program**

**Table 5b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**

**Subpart IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines  
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
04/04/2023		RN102886819

Unit ID No.	SOP/GOP Index No.	Diesel	AES No.	Displacement	Generator Set	Model Year	Install Date
EFP-1	60IIII-01	DIESEL		10-		2015	

**Stationary Reciprocating Internal Combustion Engine Attributes**  
**Form OP-UA2 (Page 12)**  
**Federal Operating Permit Program**  
**Table 5c: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**  
**Subpart IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
04/04/2023		RN102886819

Unit ID No.	SOP/GOP Index No.	Kilowatts	Filter	AECD	Standard	Compliance Option	PM Compliance	Options
EFP-1	60IIII-01	F130-368			YES	MANU YES		

**Storage Tank/Vessel Attributes**  
**Form OP-UA3 (Page 4)**  
**Federal Operating Permit Program**  
**Table 4a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)**  
**Subchapter B: Storage of Volatile Organic Compounds (VOCs)**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
04/04/2023		RN102886819

Unit ID No.	SOP/GOP Index No.	Alternate Control Requirement	ACR ID No.	Product Stored	Storage Capacity	Throughput	Potential to Emit	Uncontrolled Emissions
T-1	R5112-01	NO		VOC1	A1K-25K			
T-2	R5112-01	NO		VOC1	A1K-25K			
T-3	R5112-01	NO		VOC1	A1K-25K			
T-4	R5112-01	NO		VOC1	A1K-25K			

**Storage Tank/Vessel Attributes**  
**Form OP-UA3 (Page 5)**  
**Federal Operating Permit Program**  
**Table 4b: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)**  
**Subchapter B: Storage of Volatile Organic Compounds (VOCs)**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
04/04/2023		RN102886819

Unit ID No.	SOP/GOP Index No.	Construction Date	Tank Description	True Vapor Pressure	Primary Seal	Secondary Seal	Control Device Type	Control Device ID No.
T-1	R5112-01		NONE1	1-				
T-2	R5112-01		NONE1	1-				
T-3	R5112-01		NONE1	1-				
T-4	R5112-01		NONE1	1-				

**Texas Commission on Environmental Quality**  
**Loading/Unloading Operations Attributes**  
**Form OP-UA04 (Page 1)**  
**Federal Operating Permit Program**  
**Table 1a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)**  
**Subchapter C: Loading and Unloading of Volatile Organic Compounds**

Date	Permit No.:	Regulated Entity No.
04/04/2023		RN102886819

Unit ID No.	SOP/GOP Index No.	Chapter 115 Facility Type	Alternate Control Requirement (ACR)	ACR ID No.	Product Transferred	Transfer Type	True Vapor Pressure	Daily Through-put	Control Options
UNLOADER1	R5211-01	OTHER	NONE		VOC1	UNLOAD	0.5-		
UNLOADER2	R5211-01	OTHER	NONE		VOC1	UNLOAD	0.5+		



**Texas Commission on Environmental Quality**  
**Loading/Unloading Operations Attributes**  
**Form OP-UA04 (Page 2)**  
**Federal Operating Permit Program**  
**Table 1b: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)**  
**Subchapter C: Loading and Unloading of Volatile Organic Compounds**

Date	Permit No.:	Regulated Entity No.
04/04/2023		RN102886819

Unit ID No.	SOP Index No.	Chapter 115 Control Device Type	Chapter 115 Control Device ID No.	Vapor-Tight	Vapor Space Holding Tank	Marine Terminal Exemptions	VOC Flash Point	Uncontrolled VOC Emissions
UNLOADER2	R5211-01	NONE		YES				

**Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes**  
**Form OP-UA15 (Page 3)**  
**Federal Operating Permit Program**  
**Table 2a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)**  
**Subchapter B: Vent Gas Control**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
04/04/2023		RN102886819

Emission Point ID No.	SOP/GOP Index No.	Chapter 115 Division	Combustion Exhaust	Vent Type	Total Uncontrolled VOC Weight	Combined 24-Hour VOC Weight	VOC Concentration	VOC Concentration or Emission Rate at Maximum Operating Conditions
INK-ROOM	R5121-01	NO		REGVAPPL		100-		YES
SOL-CLNR	R5121-01	NO		REGVAPPL		100-		YES

**Texas Commission on Environmental Quality  
Printing Attributes  
Form OP-UA22 (Page 5)  
Federal Operating Permit Program**

**Table 3: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)  
Subchapter E: Graphic Arts (Printing) by Rotogravure and Flexographic Processes**

<b>Date:</b> 04/04/2023	<b>Permit No.:</b>	<b>Regulated Entity No.:</b> RN102886819
<b>Area Name:</b> StarPak		<b>Customer Reference No.:</b> CN604058461

<b>Process ID No.</b>	<b>SOP Index No.</b>	<b>Alternate Control Requirement (ACR)</b>	<b>ACR ID No.</b>	<b>Process Type</b>	<b>Potential Uncontrolled VOC Emissions</b>	<b>Control Method</b>	<b>Control Device</b>	<b>Control Device ID No.</b>	<b>Permanent Total Enclosure</b>
GRP-PRNT	R5432-01	NO		FLEXO	25+	VAPCON90	CAPINC	OX-1	YES
GRP-PRNT	R5432-02	NO		FLEXO	25+	VAPCON90	CAPINC	OX-2	YES
GRP-PRNT	R5432-03	NO		FLEXO	25+	VAPCON90	CAPINC	OX-3	YES

# Appendix D

## TCEQ Other Forms

**Texas Commission on Environmental Quality**  
**Monitoring Requirements**  
**Form OP-MON (Page 1)**  
**Federal Operating Permit Program**  
**Table 1a: CAM/PM Additions**

<b>I. Identifying Information</b>		
Account No.: HGA026Z	RN No.: RN102886819	CN: CN605931682
Permit No.: TBA	Project No.: TBA	
Area Name: StarPak		
Company Name: StarPak LLC		
<b>II. Unit/Emission Point/Group/Process Information</b>		
Revision No.:		
Unit/EPN/Group/Process ID No.: GRP-PRNT		
Applicable Form: OP-UA22		
<b>III. Applicable Regulatory Requirement</b>		
Name: 30 TAC Chapter 115, Graphics Arts Processes		
SOP/GOP Index No.: R5432		
Pollutant: VOC		
Main Standard: 115.432(c)(1)(C)		
<b>IV. Title V Monitoring Information</b>		
Monitoring Type: CAM		
Unit Size: LG		
CAM/PM Option No.: CAM-T1-002		
Deviation Limit: It shall be a deviation if the temperature in the combustion chamber is not at least 1500 degrees Fahrenheit.		
CAM/PM Option No.:		
Deviation Limit:		
<b>V. Control Device Information</b>		
Control Device ID No.: OX-1		
Control Device Type: DIRFLM		

**Texas Commission on Environmental Quality  
Monitoring Requirements  
Form OP-MON (Page 2)  
Federal Operating Permit Program**

**Table 1b: CAM/PM Control Device Additions**

Emission Unit ID No.	Control Device ID No.	Control Device Type
GRP-PRNT	OX-1	DIRFLM
GRP-PRNT	OX-2	DIRFLM
GRP-PRNT	OX-3	DIRFLM

**Permit By Rule Supplemental Table (Page 1)**  
**Table A: Registered Permits by Rule (30 TAC Chapter 106) for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
04/04/2023		RN102886819

Unit ID No.	Registration No.	PBR No.	Registration Date
N/A			

**Permit By Rule Supplemental Table (Page 2)**  
**Table B: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
04/04/2023		RN102886819

Unit ID No.	PBR No.	Version No./Date
B-1	106.183	09/04/2000
DIESEL1	106.472	09/04/2000
DIESEL2	106.472	09/04/2000
EFP-1	106.511	09/04/2000
GEN-1	106.511	09/04/2000
WFP-1	106.511	09/04/2000



**Permit By Rule Supplemental Table (Page 3)**  
**Table C: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for Insignificant Sources for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
04/04/2023		RN102886819

PBR No.	Version No./Date
N/A	

**Permit By Rule Supplemental Table (Page 4)**  
**Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
04/04/2023		RN102886819

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
B-1	106.183	09/04/2000	Maintain records showing that natural gas fired in boiler is sweet natural gas.
DIESEL1	106.472	09/04/2000	Maintain records of materials stored for each piece of equipment claiming this PBR at the site.
DIESEL2	106.472	09/04/2000	Maintain records of materials stored for each piece of equipment claiming this PBR at the site.
EFP-1	106.511	09/04/2000	Maintain records demonstrating the maximum annual operating hours of the equipment claiming this PBR. Annual operating hours shall not exceed 10% of the normal annual operating schedule of the primary equipment.
GEN-1	106.511	09/04/2000	Maintain records demonstrating the maximum annual operating hours of the equipment claiming this PBR. Annual operating hours shall not exceed 10% of the normal annual operating schedule of the primary equipment.
WFP-1	106.511	09/04/2000	Maintain records demonstrating the maximum annual operating hours of the equipment claiming this PBR. Annual operating hours shall not exceed 10% of the normal annual operating schedule of the primary equipment.

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