

## Texas Commission on Environmental Quality

Title V Existing

2979

### Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	FORNEY MILL
Does the site have a physical address?	Yes
Physical Address	
Number and Street	855 E US HIGHWAY 80
City	FORNEY
State	TX
ZIP	75126
County	KAUFMAN
Latitude (N) (##.#####)	32.738888
Longitude (W) (-###.#####)	96.438055
Primary SIC Code	2631
Secondary SIC Code	
Primary NAICS Code	322130
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN100754779
What is the name of the Regulated Entity (RE)?	SMURFIT KAPPA NORTH AMERICA FORNEY MILL
Does the RE site have a physical address?	No
Because there is no physical address, describe how to locate this site:	1 MILE S OF FORNEY ON E HWY 80
City	FORNEY
State	TX
ZIP	75126
County	KAUFMAN
Latitude (N) (##.#####)	32.738888
Longitude (W) (-###.#####)	-96.438611
Facility NAICS Code	
What is the primary business of this entity?	PAPERBOARD MANUFACTURING

### Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN603424292
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Smurfit Kappa North America LLC
Texas SOS Filing Number	801046188
Federal Tax ID	800227704
State Franchise Tax ID	18002277046
State Sales Tax ID	

Local Tax ID	
DUNS Number	55760722
Number of Employees	251-500
Independently Owned and Operated?	Yes

## Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	SMURFIT KAPPA NORTH AMERICA LLC
Prefix	MR
First	ROBERT
Middle	
Last	BROWN
Suffix	
Credentials	
Title	VICE PRESIDENT OF MILLS
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 847
Routing (such as Mail Code, Dept., or Attn:)	
City	FORNEY
State	TX
ZIP	75126
Phone (###-###-####)	2145156400
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	bob.brown@smurfitkappa.com

## Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.	HUNTER BEENE(SMURFIT KAPPA N... )
Organization Name	SMURFIT KAPPA NORTH AMERICA LLC
Prefix	MR
First	HUNTER
Middle	
Last	BEENE
Suffix	
Credentials	
Title	PROCESS ENGINEER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	855 E US HIGHWAY 80

Routing (such as Mail Code, Dept., or Attn:)	
City	FORNEY
State	TX
ZIP	75126
Phone (###-###-####)	9723363517
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	hunter.beene@smurfitwestrock.com

## Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	32 Deg 44 Min 20 Sec
3) Permit Longitude Coordinate:	96 Deg 26 Min 17 Sec
4) Is this submittal a new application or an update to an existing application?	Update
4.1. Select the permit/project number for which this update should be applied.	2979-35869
5) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	No

## Title V Attachments Existing

Attach OP-1 (Site Information Summary)	
[File Properties]	
File Name	<a href=/ePermitsExternal/faces/file?fileId=214139>OP-1 (2024-0828).pdf</a>
Hash	519E0188506D9756C799F85B7B2D6485B7BC02DC7B15BE78EC281D283F29EB3D
MIME-Type	application/pdf

Attach OP-2 (Application for Permit Revision/Renewal)

Attach OP-ACPS (Application Compliance Plan and Schedule)

Attach OP-REQ1 (Application Area-Wide Applicability Determinations and General Information)

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

If applicable, attach OP-AR1 (Acid Rain Permit Application)

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

An additional space to attach any other necessary information needed to complete the permit.

## Certification

I certify that I am the Responsible Official for this application and that, based on information and belief formed after reasonable inquiry, the statements and information on this form are true, accurate, and complete.

1. I am Robert W Brown, the owner of the STEERS account ER059226.
2. I have the authority to sign this data on behalf of the applicant named above.
3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
8. I am knowingly and intentionally signing Title V Existing 2979.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEC

OWNER OPERATOR Signature: Robert W Brown OWNER OPERATOR

Account Number:	ER059226
Signature IP Address:	208.87.234.202
Signature Date:	2024-08-29
Signature Hash:	A32D8CA0F29848E925B0AF219995018BADD307FA4122E0EAF0FDE3EB19C20DF
Form Hash Code at time of Signature:	7A59A0284E83F467F8CE2AB5D3A51911D55C93F9F3C409754F7DECAF45F1014C

## Submission

Reference Number:	The application reference number is 678463
Submitted by:	The application was submitted by ER059226/Robert W Brown
Submitted Timestamp:	The application was submitted on 2024-08-29 at 09:53:45 CDT
Submitted From:	The application was submitted from IP address 208.87.234.202
Confirmation Number:	The confirmation number is 560347
Steers Version:	The STEERS version is 6.81
Permit Number:	The permit number is 2979

## Additional Information

Application Creator: This account was created by Heriberto Quintanilla

**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: <b>Smurfit Kappa North America LLC</b>
B. Customer Reference Number (CN): <b>CN603424292</b>
C. Submittal Date (mm/dd/yyyy): <b>08/28/2024</b>
<b>II. Site Information</b>
A. Site Name: <b>Forney Mill</b>
B. Regulated Entity Reference Number (RN): <b>RN100754779</b>
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 type="checkbox"/> VOC <input checked="" type="checkbox"/> NO <sub>x</sub> <input checked="" type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> PM <sub>10</sub> <input checked="" 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 type="checkbox"/> YES <input checked="" 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 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 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 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 type="checkbox"/> YES <input type="checkbox"/> NO</span>
<b>E.</b> Has the required Public Involvement Plan been included with this application? <span style="float: right;"><input 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: <b>Robert Brown</b>
RO Title: <b>VP of Mills</b>
Employer Name: <b>Smurfit Kappa North America</b>
Mailing Address: <b>P.O. Box 847</b>
City: <b>Forney</b>
State: <b>TX</b>
ZIP Code: <b>75126</b>
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.: <b>(214) 515-6400</b>
Fax No.:
Email: <b>Bob.Brown@smurfitkappa.com</b>

**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: <b>Hunter Beene</b>
Technical Contact Title: <b>Process Engineer</b>
Employer Name: <b>Smurfit Westrock</b>
Mailing Address: <b>855 E US Hwy 80</b>
City: <b>Forney</b>
State: <b>TX</b>
ZIP Code: <b>75126</b>
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.: <b>(972) 336-3517</b>
Fax No.:
Email: <b>hunter.beene@smurfitwestrock.com</b>
<b>VIII. Reference Only Requirements</b> <i>(For reference only.)</i>
<b>A. State Senator: Senator Bob Hall, Texas Senate District 2</b>
<b>B. State Representative: Representative Keith Bell, Texas House District 4</b>
<b>C. Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)?</b> <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A</span>
<b>D. Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322?</b> <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
<b>E. Indicate the alternate language(s) in which public notice is required:</b>



**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>
A. Office/Facility Name:
B. Physical Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
C. Physical Location:
D. Contact Name Prefix: ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Contact Full Name:
E. Telephone No.:
<b>X. Application Area Information</b>
A. Area Name: <b>Forney Plant</b>
B. Physical Address: <b>855 E Highway 80</b>
City: <b>Forney</b>
State: <b>TX</b>
ZIP Code: <b>75126</b>
C. Physical Location:
D. Nearest City: <b>Forney</b>
E. State: <b>TX</b>
F. ZIP Code: <b>75126</b>

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

<b>X. Application Area Information (continued)</b>
<b>G.</b> Latitude (nearest second): <b>32° 44' 20"</b>
<b>H.</b> Longitude (nearest second): <b>96° 26' 17"</b>
<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: <b>14</b>
<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: <b>Forney City Hall</b>
<b>B.</b> Physical Address: <b>101 E Main Street</b>
City: <b>Forney</b>
ZIP Code: <b>75126</b>
<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: <b>Hunter Beene</b>
Contact Mailing Address: <b>855 E US Hwy 80</b>
City: <b>Forney</b>
State: <b>TX</b>
ZIP Code: <b>75126</b>
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.: <b>(972) 336-3517</b>

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

**XII. Delinquent Fees and Penalties**

**Notice:** 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."

**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.**

**XIII. Designated Representative (DR) Identifying Information**

DR Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ 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:

**From:** Eddie Quintanilla <Heriberto.Quintanilla@trinityconsultants.com>  
**Sent:** Wednesday, August 28, 2024 9:56 AM  
**To:** Emily Knodell  
**Cc:** Jon Taliaferro; hunter.beene@smurfitwestrock.com  
**Subject:** RE: Working Draft Permit -- FOP O2979/Project 35869, Smurfit Kappa North America LLC/Smurfit Kappa North America Forney Mill  
**Attachments:** OP-1 (2024-0828).pdf

Good morning Emily,

See attached the revised OP-1 per your instructions. This document will be included in a STEERS application update which should be submitted soon.

Let me know if you need anything else!

**Heriberto "Eddie" Quintanilla, P.E.**  
Staff Consultant

Trinity Consultants  
9737 Great Hills Trail, Ste. 340, Austin, TX 78759  
Office: 737-284-0687  
[heriberto.quintanilla@trinityconsultants.com](mailto:heriberto.quintanilla@trinityconsultants.com)



Connect with us: [LinkedIn](#) / [Facebook](#) / [Twitter](#) / [YouTube](#) / [trinityconsultants.com](http://trinityconsultants.com)

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**From:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Sent:** Wednesday, August 28, 2024 9:29 AM  
**To:** Eddie Quintanilla <[Heriberto.Quintanilla@trinityconsultants.com](mailto:Heriberto.Quintanilla@trinityconsultants.com)>  
**Cc:** Jon Taliaferro <[Jon.Taliaferro@trinityconsultants.com](mailto:Jon.Taliaferro@trinityconsultants.com)>; [hunter.beene@smurfitwestrock.com](mailto:hunter.beene@smurfitwestrock.com)  
**Subject:** RE: Working Draft Permit -- FOP O2979/Project 35869, Smurfit Kappa North America LLC/Smurfit Kappa North America Forney Mill

Good morning Eddie,

Management review is underway, and they have given me the following comment below. Please resolve by **09/03/2024**.

- 1.) **Form OP-1 (Page 5):** We believe this question is answered incorrectly based on what is seen on the OP-ACPS submitted in the original application regarding emission units addressed in the application being in compliance with their applicable requirements at the time of application submittal. Please submit an updated OP-1 (Page 5) and certify it via STEERS.

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

<b>X.</b>	<b>Application Area Information</b> <i>(continued)</i>
<b>G.</b>	Latitude (nearest second): 32° 44' 20"
<b>H.</b>	Longitude (nearest second): 96° 26' 17"
<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 checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>
<b>J.</b>	Indicate the estimated number of emission units in the application area: 14
<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.</b>	<b>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: Fomey City Hall
<b>B.</b>	Physical Address: 101 E Main Street
	City: Fomey
	ZIP Code: 75126
<b>C.</b>	Contact Person (Someone who will answer questions from the public during the public notice period):
	Contact Name Prefix: ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input checked="" type="checkbox"/> Ms. <input type="checkbox"/> Dr.):
	Contact Person Full Name: Madison Kyle
	Contact Mailing Address: P.O. Box 847
	City: Fomey
	State: TX
	ZIP Code: 75126
	Territory:
	Country:
	Foreign Postal Code:
	Internal Mail Code:
	Telephone No.: (469) 344-1514

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

Date: TBD	Regulated Entity No.: RN100754779	Permit No.: O2979
Company Name: Smurfit Kappa North America LLC		Area Name: Forney Mill

- 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>	
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.	
<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. (For reference only)	
* 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.  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.	

Let me know if you have any questions. Thank you!

Best Regards,

Emily L. Knodell  
Permit Reviewer  
TCEQ – APD – OP Section (Title V)  
(512) 239-3107



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:** Eddie Quintanilla <[Heriberto.Quintanilla@trinityconsultants.com](mailto:Heriberto.Quintanilla@trinityconsultants.com)>

**Sent:** Friday, August 9, 2024 3:15 PM

## Texas Commission on Environmental Quality

Title V Existing

2979

### Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	FORNEY MILL
Does the site have a physical address?	Yes
Physical Address	
Number and Street	855 E US HIGHWAY 80
City	FORNEY
State	TX
ZIP	75126
County	KAUFMAN
Latitude (N) (##.#####)	32.738888
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Primary SIC Code	2631
Secondary SIC Code	
Primary NAICS Code	322130
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN100754779
What is the name of the Regulated Entity (RE)?	SMURFIT KAPPA NORTH AMERICA FORNEY MILL
Does the RE site have a physical address?	No
Because there is no physical address, describe how to locate this site:	1 MILE S OF FORNEY ON E HWY 80
City	FORNEY
State	TX
ZIP	75126
County	KAUFMAN
Latitude (N) (##.#####)	32.738888
Longitude (W) (-###.#####)	-96.438611
Facility NAICS Code	
What is the primary business of this entity?	PAPERBOARD MANUFACTURING

### Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN603424292
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Smurfit Kappa North America LLC
Texas SOS Filing Number	801046188
Federal Tax ID	800227704
State Franchise Tax ID	18002277046
State Sales Tax ID	



Local Tax ID	
DUNS Number	55760722
Number of Employees	251-500
Independently Owned and Operated?	Yes

## Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	SMURFIT KAPPA NORTH AMERICA LLC
Prefix	MR
First	ROBERT
Middle	
Last	BROWN
Suffix	
Credentials	
Title	VICE PRESIDENT OF MILLS
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 847
Routing (such as Mail Code, Dept., or Attn:)	
City	FORNEY
State	TX
ZIP	75126
Phone (###-###-####)	2145156400
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	bob.brown@smurfitkappa.com

## Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.	MADISON KYLE(SMURFIT KAPPA N... )
Organization Name	SMURFIT KAPPA NORTH AMERICA LLC
Prefix	MS
First	MADISON
Middle	
Last	KYLE
Suffix	
Credentials	
Title	ENVIRONMENTAL ENGINEER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 847

Routing (such as Mail Code, Dept., or Attn:)	
City	FORNEY
State	TX
ZIP	75126
Phone (###-###-####)	4693441514
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	Madison.Kyle@smurfitkappa.com

## Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	32 Deg 44 Min 20 Sec
3) Permit Longitude Coordinate:	96 Deg 26 Min 17 Sec
4) Is this submittal a new application or an update to an existing application?	Update
4.1. Select the permit/project number for which this update should be applied.	2979-35869
5) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	No

## Title V Attachments Existing

Attach OP-1 (Site Information Summary)

Attach OP-2 (Application for Permit Revision/Renewal)

Attach OP-ACPS (Application Compliance Plan and Schedule)

Attach OP-REQ1 (Application Area-Wide Applicability Determinations and General Information)

[File Properties]

File Name	<a href=/ePermitsExternal/faces/file?fileId=210541>OP_REQ1_2024-0426 OP-REQ1 pg 88.pdf</a>
Hash	E4526AAA915708FA94450C0EC6F7D4714B0F89775195063E1EF1E1C19E756CC3
MIME-Type	application/pdf

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

[File Properties]

File Name	<a href=/ePermitsExternal/faces/file?fileId=210542>OP_REQ3_2024-0426 OP-REQ3.pdf</a>
Hash	D30F4A8D05FEFEE88CBEB32BF8385E25DD1B89656D7FB72F5A2A4725AE22BF8C
MIME-Type	application/pdf

[File Properties]

File Name	<a href=/ePermitsExternal/faces/file?fileId=210543>OP_REQ3_2024-0520 OP-REQ3.pdf</a>
Hash	C7ED29275171788694CC5FF4AF24E58A386DB035DE239570D3FC880413FD84A5

MIME-Type application/pdf

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=210544>OP\_PBRSUP\_2024-0426 OP-PBRSUP.pdf</a>

Hash 5BE7445052DD576ACF978C350D7BF0FBE4FB462039E05C04FACD6B6D3D917D7B

MIME-Type application/pdf

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=210545>2024-0307 Updated OP-UA06Tbl5.pdf</a>

Hash 3AC34F358A4445A9D849C2C526748F0A35B81B0F7B010077BDA1D03203737E00

MIME-Type application/pdf

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=210546>2024-0426 OP-UA06.pdf</a>

Hash 710765EA9BAECE5BEFF8EA0F4BD113379740EAADF01F90798EF4B9ADBBFA682D

MIME-Type application/pdf

If applicable, attach OP-AR1 (Acid Rain Permit Application)

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=210547>2024-0307 Updated cbc OP-MON.pdf</a>

Hash B5B3D52978791DA3BD4976A186513DD45617377D789B674FDA42D4AF21961437

MIME-Type application/pdf

An additional space to attach any other necessary information needed to complete the permit.

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=210548>RE\_ Working Draft Permit -- FOP O2979\_Project 35869 Smurfit Kappa North America LLC\_Smurfit Kappa North America Forney Mill.pdf</a>

Hash BBB4EBF19B95B18E7E512535C512532D1D1EF38E4CBD8A1F794890DB65253BD5

MIME-Type application/pdf

# Certification

I certify that I am the Responsible Official for this application and that, based on information and belief formed after reasonable inquiry, the statements and information on this form are true, accurate, and complete.

- 1. I am Robert W Brown, the owner of the STEERS account ER059226.
- 2. I have the authority to sign this data on behalf of the applicant named above.
- 3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
- 4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
- 5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
- 6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
- 7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
- 8. I am knowingly and intentionally signing Title V Existing 2979.
- 9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEC

OWNER OPERATOR Signature: Robert W Brown OWNER OPERATOR

Account Number:	ER059226
Signature IP Address:	208.87.234.202
Signature Date:	2024-08-07
Signature Hash:	A32D8CA0F29848E925B0AF219995018BADDC307FA4122E0EAF0FDE3EB19C20DF
Form Hash Code at time of Signature:	B690E027C585467D6744CB2F36CF196B9DDDF9F3C19C2DDFB86B196D0ECF44AA

# Submission

Reference Number:	The application reference number is 673541
Submitted by:	The application was submitted by ER059226/Robert W Brown
Submitted Timestamp:	The application was submitted on 2024-08-07 at 17:06:27 CDT
Submitted From:	The application was submitted from IP address 208.87.234.202
Confirmation Number:	The confirmation number is 555845
Steers Version:	The STEERS version is 6.79
Permit Number:	The permit number is 2979

# Additional Information

Application Creator: This account was created by Heriberto Quintanilla

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

Date:	08/09/2024
Permit No.:	O2979
RN No.:	RN100754779

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

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

**Form OP-REQ1: Page 85**

**XII. New Source Review (NSR) Authorizations (continued)**

**B. Air Quality Standard Permits**

◆	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 checked="" type="checkbox"/> YES <input 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 checked="" type="checkbox"/> NO
◆	3.	The application area includes at least one non-rule Air Quality Standard Permit for Pollution Control Projects NSR authorization.	<input checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" type="checkbox"/> NO

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

Date:	08/09/2024
Permit No.:	O2979
RN No.:	RN100754779

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

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<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):	
<i>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>.</i>			
<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):	
<i>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>.</i>			
<b>G. NSR Authorizations with FCAA § 112(g) Requirements</b>			
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:	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.: 23890	Issuance Date: 9/8/2023	Authorization No.: 152433	Issuance Date: 8/7/2018
Authorization No.: 77162	Issuance Date: 7/10/2024	Authorization No.:	Issuance Date:
Authorization No.: 80892	Issuance Date: 7/20/2017	Authorization No.:	Issuance Date:
Authorization No.: 84013	Issuance Date: 4/11/2017	Authorization No.:	Issuance Date:

**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Cc:** Jon Taliaferro <[Jon.Taliaferro@trinityconsultants.com](mailto:Jon.Taliaferro@trinityconsultants.com)>; [hunter.beene@smurfitwestrock.com](mailto:hunter.beene@smurfitwestrock.com)  
**Subject:** RE: Working Draft Permit -- FOP O2979/Project 35869, Smurfit Kappa North America LLC/Smurfit Kappa North America Forney Mill

Hey Emily!

See attached the revised pages 85 and 87 of the OP-REQ1. These will be uploaded and certified through STEERS probably by Monday.

Let me know if anything else is needed,

**Heriberto "Eddie" Quintanilla, P.E.**  
Staff Consultant

Trinity Consultants  
9737 Great Hills Trail, Ste. 340, Austin, TX 78759  
Office: 737-284-0687  
[heriberto.quintanilla@trinityconsultants.com](mailto:heriberto.quintanilla@trinityconsultants.com)



Connect with us: [LinkedIn](#) / [Facebook](#) / [Twitter](#) / [YouTube](#) / [trinityconsultants.com](http://trinityconsultants.com)

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**From:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Sent:** Friday, August 9, 2024 11:22 AM  
**To:** Eddie Quintanilla <[Heriberto.Quintanilla@trinityconsultants.com](mailto:Heriberto.Quintanilla@trinityconsultants.com)>  
**Cc:** Jon Taliaferro <[Jon.Taliaferro@trinityconsultants.com](mailto:Jon.Taliaferro@trinityconsultants.com)>; [hunter.beene@smurfitwestrock.com](mailto:hunter.beene@smurfitwestrock.com)  
**Subject:** RE: Working Draft Permit -- FOP O2979/Project 35869, Smurfit Kappa North America LLC/Smurfit Kappa North America Forney Mill

Good morning Eddie,

Thank you for the update. I gave the new Technical Contact information to APIRT and have updated the necessary docs. I also asked them to add Hunter Beene as the Public Notice contact in place of Madison Kyle. Also, management has instructed me to move this project forward to mailing out the PNAP and public notice to keep it on schedule. We will work with you on the ownership change when it is complete and can make the change at final issuance time if necessary.

During QA/QC review, the following issues were found. Please resolve by **08/12/2024.**

- 1.) **Form OP-REQ1:** Standard permit 152433 is a nonrule pollution control project. So OP-REQ1, Page 85, XII.B.3. answer should be "Yes". Please submit an updated OP-REQ1, Page 85.

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

Date:	TBD
Permit No.:	O2979
RN No.:	RN100754779

- ◆ For SOP applications, answer ALL questions unless otherwise directed.  
◆ For GOP applications, answer ONLY these questions unless otherwise directed.

Form OP-REQ1: Page 85		
<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 checked="" type="checkbox"/> YES <input 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" type="checkbox"/> NO

- 2.) **Form OP-REQ1, Page 87:** Do you want to update NSR 77162 to the most recent issuance 07/10/2024? If so, please send an updated Form OP-REQ1, Page 87 listing the more recent date.



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

Date:	TBD
Permit No.:	O2979
RN No.:	RN100754779

- ◆ 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):	
<i>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>.</i>			
<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):	
<i>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>.</i>			
<b>G. NSR Authorizations with FCAA § 112(g) Requirements</b>			
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:	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.: 23890	Issuance Date: 9/8/2023	Authorization No.: 152433	Issuance Date: 8/7/2018
Authorization No.: 77162	Issuance Date: 8/11/2015	Authorization No.:	Issuance Date:
Authorization No.: 80892	Issuance Date: 7/20/2017	Authorization No.:	Issuance Date:
Authorization No.: 84013	Issuance Date: 4/11/2017	Authorization No.:	Issuance Date:

TCEQ - 10043 (APDG 5733-v46, Revised 11/20) OP-REQ1  
This form is for use by facilities subject to air quality permit requirements and may be revised periodically. (Title V DMS Release 11/20)

Page 87 of 88

Let me know if you have questions. Thank you!

Best Regards,

Emily L. Knodell  
Permit Reviewer  
TCEQ – APD – OP Section (Title V)  
(512) 239-3107



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

From: Eddie Quintanilla <[Heriberto.Quintanilla@trinityconsultants.com](mailto:Heriberto.Quintanilla@trinityconsultants.com)>  
Sent: Thursday, August 8, 2024 9:01 AM

## Texas Commission on Environmental Quality

Title V Existing

2979

### Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	FORNEY MILL
Does the site have a physical address?	Yes
Physical Address	
Number and Street	855 E US HIGHWAY 80
City	FORNEY
State	TX
ZIP	75126
County	KAUFMAN
Latitude (N) (##.#####)	32.738888
Longitude (W) (-###.#####)	96.438055
Primary SIC Code	2631
Secondary SIC Code	
Primary NAICS Code	322130
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN100754779
What is the name of the Regulated Entity (RE)?	SMURFIT KAPPA NORTH AMERICA FORNEY MILL
Does the RE site have a physical address?	No
Because there is no physical address, describe how to locate this site:	1 MILE S OF FORNEY ON E HWY 80
City	FORNEY
State	TX
ZIP	75126
County	KAUFMAN
Latitude (N) (##.#####)	32.738888
Longitude (W) (-###.#####)	-96.438611
Facility NAICS Code	
What is the primary business of this entity?	PAPERBOARD MANUFACTURING

### Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN603424292
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Smurfit Kappa North America LLC
Texas SOS Filing Number	801046188
Federal Tax ID	800227704
State Franchise Tax ID	18002277046
State Sales Tax ID	

Local Tax ID	
DUNS Number	55760722
Number of Employees	251-500
Independently Owned and Operated?	Yes

## Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	SMURFIT KAPPA NORTH AMERICA LLC
Prefix	MR
First	ROBERT
Middle	
Last	BROWN
Suffix	
Credentials	
Title	VICE PRESIDENT OF MILLS
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 847
Routing (such as Mail Code, Dept., or Attn:)	
City	FORNEY
State	TX
ZIP	75126
Phone (###-###-####)	2145156400
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	bob.brown@smurfitkappa.com

## Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.	MADISON KYLE(SMURFIT KAPPA N... )
Organization Name	SMURFIT KAPPA NORTH AMERICA LLC
Prefix	MS
First	MADISON
Middle	
Last	KYLE
Suffix	
Credentials	
Title	ENVIRONMENTAL ENGINEER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 847

Routing (such as Mail Code, Dept., or Attn:)	
City	FORNEY
State	TX
ZIP	75126
Phone (###-###-####)	4693441514
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	Madison.Kyle@smurfitkappa.com

## Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	32 Deg 44 Min 20 Sec
3) Permit Longitude Coordinate:	96 Deg 26 Min 17 Sec
4) Is this submittal a new application or an update to an existing application?	Update
4.1. Select the permit/project number for which this update should be applied.	2979-35869
5) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	No

## Title V Attachments Existing

Attach OP-1 (Site Information Summary)

Attach OP-2 (Application for Permit Revision/Renewal)

Attach OP-ACPS (Application Compliance Plan and Schedule)

Attach OP-REQ1 (Application Area-Wide Applicability Determinations and General Information)

[File Properties]

File Name	<a href=/ePermitsExternal/faces/file?fileId=210541>OP_REQ1_2024-0426 OP-REQ1 pg 88.pdf</a>
Hash	E4526AAA915708FA94450C0EC6F7D4714B0F89775195063E1EF1E1C19E756CC3
MIME-Type	application/pdf

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

[File Properties]

File Name	<a href=/ePermitsExternal/faces/file?fileId=210542>OP_REQ3_2024-0426 OP-REQ3.pdf</a>
Hash	D30F4A8D05FEFEE88CBEB32BF8385E25DD1B89656D7FB72F5A2A4725AE22BF8C
MIME-Type	application/pdf

[File Properties]

File Name	<a href=/ePermitsExternal/faces/file?fileId=210543>OP_REQ3_2024-0520 OP-REQ3.pdf</a>
Hash	C7ED29275171788694CC5FF4AF24E58A386DB035DE239570D3FC880413FD84A5

MIME-Type application/pdf

Attach OP-PBR SUP (Permits by Rule Supplemental Table)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=210544>OP\_PBR SUP\_2024-0426 OP-PBR SUP.pdf</a>

Hash 5BE7445052DD576ACF978C350D7BF0FBE4FB462039E05C04FACD6B6D3D917D7B

MIME-Type application/pdf

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=210545>2024-0307 Updated OP-UA06Tbl5.pdf</a>

Hash 3AC34F358A4445A9D849C2C526748F0A35B81B0F7B010077BDA1D03203737E00

MIME-Type application/pdf

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=210546>2024-0426 OP-UA06.pdf</a>

Hash 710765EA9BAECE5BEFF8EA0F4BD113379740EAADF01F90798EF4B9ADBBFA682D

MIME-Type application/pdf

If applicable, attach OP-AR1 (Acid Rain Permit Application)

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=210547>2024-0307 Updated cbc OP-MON.pdf</a>

Hash B5B3D52978791DA3BD4976A186513DD45617377D789B674FDA42D4AF21961437

MIME-Type application/pdf

An additional space to attach any other necessary information needed to complete the permit.

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=210548>RE\_ Working Draft Permit --FOP O2979\_Project 35869 Smurfit Kappa North America LLC\_Smurfit Kappa North America Forney Mill.pdf</a>

Hash BBB4EBF19B95B18E7E512535C512532D1D1EF38E4CBD8A1F794890DB65253BD5

MIME-Type application/pdf

# Certification

I certify that I am the Responsible Official for this application and that, based on information and belief formed after reasonable inquiry, the statements and information on this form are true, accurate, and complete.

- 1. I am Robert W Brown, the owner of the STEERS account ER059226.
- 2. I have the authority to sign this data on behalf of the applicant named above.
- 3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
- 4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
- 5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
- 6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
- 7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
- 8. I am knowingly and intentionally signing Title V Existing 2979.
- 9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEC

OWNER OPERATOR Signature: Robert W Brown OWNER OPERATOR

Account Number:	ER059226
Signature IP Address:	208.87.234.202
Signature Date:	2024-08-07
Signature Hash:	A32D8CA0F29848E925B0AF219995018BADD307FA4122E0EAF0FDE3EB19C20DF
Form Hash Code at time of Signature:	B690E027C585467D6744CB2F36CF196B9DDDF9F3C19C2DDFB86B196D0ECF44AA

# Submission

Reference Number:	The application reference number is 673541
Submitted by:	The application was submitted by ER059226/Robert W Brown
Submitted Timestamp:	The application was submitted on 2024-08-07 at 17:06:27 CDT
Submitted From:	The application was submitted from IP address 208.87.234.202
Confirmation Number:	The confirmation number is 555845
Steers Version:	The STEERS version is 6.79
Permit Number:	The permit number is 2979

# Additional Information

Application Creator: This account was created by Heriberto Quintanilla

**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>

**Cc:** Jon Taliaferro <[Jon.Taliaferro@trinityconsultants.com](mailto:Jon.Taliaferro@trinityconsultants.com)>; Carolyn Maus <[carolyn.maus@tceq.texas.gov](mailto:carolyn.maus@tceq.texas.gov)>; [hunter.beene@smurfitwestrock.com](mailto:hunter.beene@smurfitwestrock.com)

**Subject:** RE: Working Draft Permit -- FOP O2979/Project 35869, Smurfit Kappa North America LLC/Smurfit Kappa North America Forney Mill

Good morning Emily,

Madison Kyle is no longer with Smurfit, and therefore not the Technical Contact anymore. Please add Hunter Beene as the Technical Contact for now. He has been cc'd in this email thread. Please update the necessary documents, including the PNAP.

- Full Name: Mr. Hunter Beene
- Title: Process Engineer
- Employer Name: Smurfit Westrock
- Mailing Address: 855 E US Hwy 80, Forney, TX 75126
- Phone number: 972-336-3517
- Email: [hunter.beene@smurfitwestrock.com](mailto:hunter.beene@smurfitwestrock.com)

Let us know if you have any questions!

**Heriberto "Eddie" Quintanilla, P.E.**  
Staff Consultant

Trinity Consultants  
9737 Great Hills Trail, Ste. 340, Austin, TX 78759  
Office: 737-284-0687  
[heriberto.quintanilla@trinityconsultants.com](mailto:heriberto.quintanilla@trinityconsultants.com)



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**From:** Eddie Quintanilla <[Heriberto.Quintanilla@trinityconsultants.com](mailto:Heriberto.Quintanilla@trinityconsultants.com)>

**Sent:** Wednesday, August 7, 2024 5:25 PM

**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>

**Cc:** Kyle, Madison <[Madison.Kyle@smurfitkappa.com](mailto:Madison.Kyle@smurfitkappa.com)>; Jon Taliaferro <[Jon.Taliaferro@trinityconsultants.com](mailto:Jon.Taliaferro@trinityconsultants.com)>; Carolyn Maus <[carolyn.maus@tceq.texas.gov](mailto:carolyn.maus@tceq.texas.gov)>

**Subject:** RE: Working Draft Permit -- FOP O2979/Project 35869, Smurfit Kappa North America LLC/Smurfit Kappa North America Forney Mill

Good afternoon Emily!

We have uploaded the attachments and email thread through STEERS. See attached the relevant COR.

Let me know if y'all need anything else!

**Heriberto "Eddie" Quintanilla, P.E.**  
Staff Consultant

Trinity Consultants  
9737 Great Hills Trail, Ste. 340, Austin, TX 78759  
Office: 737-284-0687  
[heriberto.quintanilla@trinityconsultants.com](mailto:heriberto.quintanilla@trinityconsultants.com)



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**From:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Sent:** Monday, August 5, 2024 3:23 PM  
**To:** Eddie Quintanilla <[Heriberto.Quintanilla@trinityconsultants.com](mailto:Heriberto.Quintanilla@trinityconsultants.com)>  
**Cc:** Kyle, Madison <[Madison.Kyle@smurfitkappa.com](mailto:Madison.Kyle@smurfitkappa.com)>; Jon Taliaferro <[Jon.Taliaferro@trinityconsultants.com](mailto:Jon.Taliaferro@trinityconsultants.com)>; Carolyn Maus <[carolyn.maus@tceq.texas.gov](mailto:carolyn.maus@tceq.texas.gov)>  
**Subject:** RE: Working Draft Permit -- FOP 02979/Project 35869, Smurfit Kappa North America LLC/Smurfit Kappa North America Forney Mill

Good afternoon Eddie,

Thank you for your review and approval on the WDP. Please resolve the items below by **08/07/2024.**

- 1.) **Form OP-CRO1:** At this time, I would like to ask for the form OP-CRO1 certifying the changes made to the application. Please fill out the Time Period from **11/17/2023** to **08/05/2024**. Please send me an electronic copy and the original, signed hardcopy. Alternatively in lieu of the OP-CRO1, you can submit this email thread and attachments as an update to the application through 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. STEERS does not accept the Outlook ".msg" file type, but it does take PDFs.
  
- 2.) **Permit Consultant Info:** Please confirm the information I have for the permit consultants below is correct and fill out the highlight so I can add it to my tech summ.

**Permit Consultant:**

John Taliaferro

<Title>

Trinity Consultants  
9737 Great Hills Trail, Ste. 340  
Austin, TX 78759  
Phone: (361) 215-9994  
Email: [jon.taliaferro@trinityconsultants.com](mailto:jon.taliaferro@trinityconsultants.com)



**Permit Consultant:**

Heriberto "Eddie" Quintanilla  
Staff Consultant  
Trinity Consultants  
9737 Great Hills Trail, Ste. 340  
Austin, TX 78759  
Phone: (737) 284-0687  
Email: [heriberto.quintanilla@trinityconsultants.com](mailto:heriberto.quintanilla@trinityconsultants.com)

Let me know if you have any questions. Thank you!

Sincerely,

Emily L. Knodell  
Permit Reviewer  
TCEQ – APD – OP Section (Title V)  
(512) 239-3107



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**From:** Eddie Quintanilla <[Heriberto.Quintanilla@trinityconsultants.com](mailto:Heriberto.Quintanilla@trinityconsultants.com)>  
**Sent:** Monday, August 5, 2024 1:22 PM  
**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Cc:** Kyle, Madison <[Madison.Kyle@smurfitkappa.com](mailto:Madison.Kyle@smurfitkappa.com)>; Jon Taliaferro <[Jon.Taliaferro@trinityconsultants.com](mailto:Jon.Taliaferro@trinityconsultants.com)>; Carolyn Maus <[carolyn.maus@tceq.texas.gov](mailto:carolyn.maus@tceq.texas.gov)>  
**Subject:** RE: Working Draft Permit -- FOP O2979/Project 35869, Smurfit Kappa North America LLC/Smurfit Kappa North America Forney Mill

Good afternoon Emily,

Thank you for your patience, and again, we apologize for our delay. We have reviewed the draft permit and it is approved. We will be looking at the Change of Ownership forms and planning on a response as soon as possible, but it will probably take until the dust settles from the company merger.

Thank you so much!

**Heriberto "Eddie" Quintanilla, P.E.**  
Staff Consultant

Trinity Consultants  
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[heriberto.quintanilla@trinityconsultants.com](mailto:heriberto.quintanilla@trinityconsultants.com)



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**From:** Eddie Quintanilla <[Heriberto.Quintanilla@trinityconsultants.com](mailto:Heriberto.Quintanilla@trinityconsultants.com)>

**Sent:** Friday, August 2, 2024 4:04 PM

**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>

**Cc:** Kyle, Madison <[Madison.Kyle@smurfitkappa.com](mailto:Madison.Kyle@smurfitkappa.com)>; Jon Taliaferro

<[Jon.Taliaferro@trinityconsultants.com](mailto:Jon.Taliaferro@trinityconsultants.com)>; Carolyn Maus <[carolyn.maus@tceq.texas.gov](mailto:carolyn.maus@tceq.texas.gov)>

**Subject:** RE: Working Draft Permit -- FOP O2979/Project 35869, Smurfit Kappa North America LLC/Smurfit Kappa North America Forney Mill

Hey Emily,

Thank you for the second draft! We apologize but we haven't had time to look carefully at the permit. We will be able to give you an answer by Monday.

Let me know if this is acceptable!

**Heriberto "Eddie" Quintanilla, P.E.**

Staff Consultant

Trinity Consultants

9737 Great Hills Trail, Ste. 340, Austin, TX 78759

Office: 737-284-0687

[heriberto.quintanilla@trinityconsultants.com](mailto:heriberto.quintanilla@trinityconsultants.com)



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**From:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>

**Sent:** Friday, July 26, 2024 3:15 PM

**To:** Eddie Quintanilla <[Heriberto.Quintanilla@trinityconsultants.com](mailto:Heriberto.Quintanilla@trinityconsultants.com)>

**Cc:** Kyle, Madison <[Madison.Kyle@smurfitkappa.com](mailto:Madison.Kyle@smurfitkappa.com)>; Jon Taliaferro

<[Jon.Taliaferro@trinityconsultants.com](mailto:Jon.Taliaferro@trinityconsultants.com)>; Carolyn Maus <[carolyn.maus@tceq.texas.gov](mailto:carolyn.maus@tceq.texas.gov)>

**Subject:** RE: Working Draft Permit -- FOP O2979/Project 35869, Smurfit Kappa North America LLC/Smurfit Kappa North America Forney Mill

Good afternoon Eddie,

Thank you for your patience as we work to resolve the flowchart issue.

I have prepared a WDP "Version 2" for your review and/or approval. Please also see my responses to your comments below in **green**. Many of the changes I made in the WDP

are highlighted in yellow to help me (and you) keep track of what is changing in the permit, and these highlights will be removed later on.

Please review the WDP and submit to me any comments you have by **08/02/2024**. Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP. I have also attached the “Change of Ownership Form” which contains guidance for the ownership change.

Since this is a follow-up review to the previously submitted and reviewed WDP, only comments concerning changes since the last WDP may be considered by TCEQ. Any comments outside the scope of the most recent changes should be submitted as a separate project.

My responses to your comments are as follows:

1. Term and Condition 11 is missing under the New Source Review Authorization Requirements section. See attached the latest form OP-PBRSUP.  
  
Added (Draft Page 9).
2. NOx requirements are missing for unit CHP, index numbers R7400-1, R7400-2, and 60KKKK  
  
Added (Draft Pages 20, 21, 22).
3. We would like to revise the OP-UA06 originally submitted. See attached the form OP-UA06. Attached also is the form OP-REQ3 which details the NOx requirements for unit WBLR, index number 60DB that we want. Using the UA codes, the Main Standard should be § 60.44b(d).  
  
Added (Draft Page 27).

The following citations were manually added/deleted as instructed by Carolyn after she reviewed the issue:

- Main standard:
  - Deleted 60.44b(l)(1).
  - Added 60.44b(d). Used the following for the textual description:  
*On/after the §60.8 tests, no facilities firing specified fuels shall discharge NOx in excess of 130 ng/J (0.30 lb/MMBtu) heat input, unless subject to a federally enforceable annual capacity factor of 10% or less.”*
- Monitoring/testing:
  - Deleted 60.46b(e)(4).
  - Deleted 60.48b(g)(1).

- Reporting:
  - Deleted 60.49b(h).
  - Deleted 60.49b(h)(4).
  - Added 60.49b(a)(2).
- a. We think there is an issue with TCEQ's interpretation of § 60.44b(d). TCEQ interpreted that units constructed after 7/9/1997 must comply with § 60.44b(l)(1) instead of (d). This is true for other special fuel combo limits like in (c) and (e). But (d) doesn't have the language "Except as provided under paragraph (l) of this section,..." like (c) and (e).

**Carolyn's Feedback:** After looking at this, we can confirm that the flowchart is definitely not updated to address this problem. When you mention being able to reach the "correct" citations, you may have gone down a wrong direction to get there since you do not have the coded flowchart. We are currently in the midst of finishing the updates from the 2012 amendments and that is the ongoing work that Sarah was going to add this issue into. The current posted flowchart has not been updated in years.

- b. See also attached an email conversation between Madison Aalund, Sarah Molloy, and I. At first, I thought that the NSPS Db flowchart page 43 had a problem, but actually the problem is in page 40. Feel free to send them the justification above to make the necessary changes to the flowchart

**Carolyn's Feedback:** We agree that the flowchart has issues. Page 43 is fine. The Yes path coming out of the diamond on the top right is for the F10-NGSL code for ACF Option and it correctly goes to the generic requirement box. 60.44b(d) exempts units with that type of annual capacity factor. Therefore, you should not change the ACF Option code to that. Page 48, with the actual requirements, is also fine. So the original discussion with Sarah about the issue is not quite accurate. However, your later point in your April 26 email, that you now believe page 40 is the problem, is correct. Page 40 is not constructed properly – there is no way for your unit to reach the subsequent pages it needs based on how the diamonds are worded on that page. We will either need to word the diamonds differently, rearrange/add a new diamond, or something else to allow the 60.44b(d) units to reach their proper place. We will discuss further with Sarah so the appropriate information can be provided to the RRT staff working on this rule.

- 4. We would like to make changes to the PBRs incorporated in the permit. See attached the form OP-REQ1 page 88.

Resolved (Draft Page 43).

5. Correct the PBR pre-construction authorization for unit COOLTOWER3. It is currently PBR 106.371, version no.: 09/01/2017. It should be version no.: 09/04/2000.

Added (Draft Page 44).

Let me know if you have any questions. Have a great weekend!

Best Regards,

Emily L. Knodell  
Permit Reviewer  
TCEQ – APD – OP Section (Title V)  
(512) 239-3107



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---

**From:** Eddie Quintanilla <[Heriberto.Quintanilla@trinityconsultants.com](mailto:Heriberto.Quintanilla@trinityconsultants.com)>

**Sent:** Thursday, July 25, 2024 3:02 PM

**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>

**Cc:** Kyle, Madison <[Madison.Kyle@smurfitkappa.com](mailto:Madison.Kyle@smurfitkappa.com)>; Jon Taliaferro <[Jon.Taliaferro@trinityconsultants.com](mailto:Jon.Taliaferro@trinityconsultants.com)>

**Subject:** RE: Working Draft Permit -- FOP O2979/Project 35869, Smurfit Kappa North America LLC/Smurfit Kappa North America Forney Mill

Hey Emily,

Thanks for the update! The RO will remain the same.

**Heriberto "Eddie" Quintanilla, P.E.**  
Staff Consultant

Trinity Consultants  
9737 Great Hills Trail, Ste. 340, Austin, TX 78759  
Office: 737-284-0687  
[heriberto.quintanilla@trinityconsultants.com](mailto:heriberto.quintanilla@trinityconsultants.com)



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**From:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Sent:** Wednesday, July 24, 2024 10:00 AM  
**To:** Eddie Quintanilla <[Heriberto.Quintanilla@trinityconsultants.com](mailto:Heriberto.Quintanilla@trinityconsultants.com)>  
**Cc:** Kyle, Madison <[Madison.Kyle@smurfitkappa.com](mailto:Madison.Kyle@smurfitkappa.com)>; Jon Taliaferro <[Jon.Taliaferro@trinityconsultants.com](mailto:Jon.Taliaferro@trinityconsultants.com)>  
**Subject:** RE: Working Draft Permit -- FOP O2979/Project 35869, Smurfit Kappa North America LLC/Smurfit Kappa North America Forney Mill

Good morning Eddie,

Thanks for checking in. I am still trying to resolve #3 of your WDP comments, this is the only item that remains before I can send you an updated WDP version. Item #3 requires a manual build so I am just waiting for the technical specialists to review the issue and send it back to me.

For the ownership change, will there be a new RO?

Best Regards,

Emily L. Knodell  
Permit Reviewer  
TCEQ – APD – OP Section (Title V)  
(512) 239-3107



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**From:** Eddie Quintanilla <[Heriberto.Quintanilla@trinityconsultants.com](mailto:Heriberto.Quintanilla@trinityconsultants.com)>  
**Sent:** Monday, July 22, 2024 3:38 PM  
**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Cc:** Kyle, Madison <[Madison.Kyle@smurfitkappa.com](mailto:Madison.Kyle@smurfitkappa.com)>; Jon Taliaferro <[Jon.Taliaferro@trinityconsultants.com](mailto:Jon.Taliaferro@trinityconsultants.com)>  
**Subject:** RE: Working Draft Permit -- FOP O2979/Project 35869, Smurfit Kappa North America LLC/Smurfit Kappa North America Forney Mill

Hey Emily!

Could I get an update on this project? Do you need anything else from me?

FYI, Smurfit Kappa and WestRock have merged into Smurfit WestRock. Would it be possible to make the Change of Ownership during this renewal project? Let me know what information you need. Thanks!

**Heriberto "Eddie" Quintanilla, P.E.**

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

**Table 1a: Additions**

<b>Date: 05/20/2024</b>	<b>Regulated Entity No.: RN100754779</b>	<b>Permit No.: 02979</b>
<b>Company Name: Smurfit Kappa North America LLC</b>	<b>Area Name: Forney Mill</b>	

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)
3	WBLR	OP-UA06	60Db	NOx	40 CFR Part 60, Subpart Db	§60.44b(d) §60.44b(h), (i) §60.46b(a)
2	CHP	OP-UA11	R7400-1	NOx	30 TAC Chapter 117, Subchapter B	§117.410(a)(5)(B) §117.410(a), [G](b)(1), [G](e)(1), (e)(2) [G]§117.410(e)(3), (e)(4) §117.430(b), (b)(5) §117.440(j)
2	CHP	OP-UA11	R7400-2	NOx	30 TAC Chapter 117, Subchapter B	§117.410(a)(6) 2 §117.410(a)(5)(B) §117.410(a), [G](b)(1), [G](e)(1), (e)(2) [G]§117.410(e)(3), (e)(4) §117.430(b), (b)(5) §117.440(j)
2	CHP	OP-UA11	60KKKK	NOx	40 CFR Part 60, Subpart KKKK	§60.4320(a)-Table 1 §60.4320(a)-(b) §60.4325 §60.4333(a), (b)(1) §60.4335(b)(1) [G]§60.4345

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

**Table 1b: Additions**

<b>Date: 05/20/2024</b>	<b>Regulated Entity No.: RN100754779</b>	<b>Permit No.: 02979</b>
<b>Company Name: Smurfit Kappa North America LLC</b>	<b>Area Name: Forney Mill</b>	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
3	WBLR	60Db	NOx	§60.46b(c), [T](e), [T](e)(1) [G]§60.48b(b), (c)-(e), [G](e)(2) §60.48b(e)(3), (f)	[G]§60.48b(b), (c) [G]§60.49b(d), [G](g), (o)	§60.49b(a), (a)(1)-(3) §60.49b(b), (i), (v), (w)
2	CHP	R7400-1	NOx	§117.435(a)(1), (a)(3), (b), (c) §117.440(a), (c)(1), [G](c)(3), (f), (k)(1) §117.8100(a), (a)(1), (a)(1)(A)-(B) §117.8100(a)(1)(B)(i)-(ii), (a)(1)(C) §117.8100(a)(2), [G](a)(3), (a)(4)-(5) §117.8100(a)(5)(A)-(B) [G]§117.8100(a)(5)(D)-(E), (a)(6)	§117.445(a), (f), (f)(1), [G](f)(2) §117.445(f)(7), (f)(8) §117.8100(a)(5)(C)	§117.435(f) §117.445(b), [G](c), [G](d) §117.8010, [G](1), (2), (2)(A)-(D) [G]§117.8010(3), (4), [G](5) §117.8010(6), [G](7) [G]§117.8010(8) §117.8100(c)
2	CHP	R7400-2	NOx	§117.435(a)(1), (a)(3), (b), (c) §117.440(a), (c)(1), [G](c)(3), (f), (k)(1) §117.8100(a), (a)(1), (a)(1)(A)-(B) §117.8100(a)(1)(B)(i)-(ii), (a)(1)(C) §117.8100(a)(2), [G](a)(3), (a)(4)-(5) §117.8100(a)(5)(A)-(B) [G]§117.8100(a)(5)(D)-(E), (a)(6)	§117.445(a), (f), (f)(1), [G](f)(2) §117.445(f)(7), (f)(8) §117.8100(a)(5)(C)	§117.435(f) §117.445(b), [G](c), [G](d) §117.8010, [G](1), (2), (2)(A)-(D) [G]§117.8010(3), (4), [G](5) §117.8010(6), [G](7) [G]§117.8010(8) §117.8100(c)
2	CHP	60KKKK	NOx	§60.4333(b)(1) §60.4335(b)(1) [G]§60.4345 §60.4350(a)-(b), (d)-(f), (h) [G]§60.4400(a) §60.4400(b), (b)(1), (b)(2), (b)(4), (b)(5) §60.4400(b)(6) [G]§60.4405	[G]§60.4345 §60.4350(b)	[G]§60.4345 §60.4350(d) §60.4375(a) §60.4380, [G](b) §60.4395



Staff Consultant

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**From:** Eddie Quintanilla  
**Sent:** Monday, May 20, 2024 2:38 PM  
**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Cc:** Kyle, Madison <[Madison.Kyle@smurfitkappa.com](mailto:Madison.Kyle@smurfitkappa.com)>; Jon Taliaferro <[Jon.Taliaferro@trinityconsultants.com](mailto:Jon.Taliaferro@trinityconsultants.com)>  
**Subject:** RE: Working Draft Permit -- FOP O2979/Project 35869, Smurfit Kappa North America LLC/Smurfit Kappa North America Forney Mill

Good afternoon Emily,

See attached the requested OP-REQ3. Let me know if anything else is needed!

**Heriberto "Eddie" Quintanilla, P.E.**  
Staff Consultant

Trinity Consultants  
9737 Great Hills Trail, Ste. 340, Austin, TX 78759  
Office: 737-284-0687  
[heriberto.quintanilla@trinityconsultants.com](mailto:heriberto.quintanilla@trinityconsultants.com)



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---





**From:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Sent:** Monday, May 20, 2024 9:50 AM  
**To:** Eddie Quintanilla <[Heriberto.Quintanilla@trinityconsultants.com](mailto:Heriberto.Quintanilla@trinityconsultants.com)>  
**Cc:** Kyle, Madison <[Madison.Kyle@smurfitkappa.com](mailto:Madison.Kyle@smurfitkappa.com)>; Jon Taliaferro <[Jon.Taliaferro@trinityconsultants.com](mailto:Jon.Taliaferro@trinityconsultants.com)>  
**Subject:** RE: Working Draft Permit -- FOP O2979/Project 35869, Smurfit Kappa North America LLC/Smurfit Kappa North America Forney Mill




Good morning Eddie,

Thank you for your review and comments on the WDP.

Please resolve the following by **05/24/2024**.


- 1.) **Form OP-REQ3:** In your second comment, you mentioned NOx requirements are missing for Unit ID CHP, Index numbers R7400-1, R7400-2, and 60KKKK. Could you please send me an OP-REQ3 for Unit ID CHP which lists the citations that you want to add? The original OP-REQ3 only has Unit ID WBLR.

 Eddie Quintanilla <Heriberto.Quintanilla@trinityconsultants.com>  
To  Emily Knodell  
Cc  Jon Taliaferro;  hunter.beene@smurfitwestrock.com

 Reply  Reply All  Forward 

Fri 8/9/2024 3:15 PM

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 OP-REQ1 pgs 85 and 87.pdf  
158 KB

Federal Operating Permit Program

Table 1a: Additions

Date: 4/26/2024	Regulated Entity No.: RN100754779	Permit No.: 02979
Company Name: Smurfit Kappa North America LLC	Area Name: Forney Mill	

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)
3	WBLR	OP-UA06	60Db	NOx	40 CFR Part 60, Subpart Db	§60.44b(d) §60.44b(h), (i) §60.46b(a)

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

Table 1b: Additions

Date: 4/26/2024	Regulated Entity No.: RN100754779	Permit No.: 02979
Company Name: Smurfit Kappa North America LLC	Area Name: Forney Mill	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
3	WBLR	60Db	NOx	§60.46b(c), [T](e), [T](e)(1) [G]§60.48b(b), (c)-(e), [G](e)(2) §60.48b(e)(3), (f)	[G]§60.48b(b), (c) [G]§60.49b(d), [G](g), (o)	§60.49b(a), (a)(1)-(3) §60.49b(b), (i), (v), (w)

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

Date	Permit Number	Regulated Entity Number	Area Name
4/26/2024	02979	RN100754779	Forney Mill

Unit ID No.	Registration No.	PBR No.	Registration Date
CoatPlant-1	40561	106.433	3/15/1999
Steam Boiler No. 1	53953	106.183	2/3/2003
Steam Boiler No. 2	53953	106.183	2/3/2003
WW-FLARE	119335	106.492, 106.532	5/30/2014
WW-FUG	119335	106.492, 106.532	5/30/2014

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

Date	Permit Number	Regulated Entity Number	Area Name
4/26/2024	02979	RN100754779	Forney Mill

Unit ID No.	PBR No.	Version No./Date
COTGASDRY1	106.183	9/4/2000
COTGASDRY4	106.183	9/4/2000
COTIRDRYR1	106.183	9/4/2000
COTIRDRYR3	106.183	9/4/2000
LBDRYER37	106.183	9/4/2000
LBDRYER38	106.183	9/4/2000
LBDRYER45	106.183	9/4/2000
LBDRYER46	106.183	9/4/2000
LBIRDRYR1	106.183	9/4/2000
COOLTOWER3	106.371	9/4/2000
COATBLDG	106.433	3/14/1997
PTWASH1	106.454	11/1/2001
PTWASH2	106.454	11/1/2001
DSL-UPLOAD	106.472	9/4/2000
LMFWENG1	106.511	3/14/1997
MMFWENG1	106.511	3/14/1997
WASTEWATER	106.532	3/14/1997

Texas Commission on Environmental Quality  
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

Date	Permit Number	Regulated Entity Number	Area Name
4/26/2024	02979	RN100754779	Forney Mill

PBR No.	Version No./Date
N/A	N/A

Texas Commission on Environmental Quality  
Permit By Rule Supplemental Table (Page 4)

Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area

Date	Permit Number	Regulated Entity Number	Area Name
4/26/2024	02979	RN100754779	Forney Mill

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
CoatPlant-1	106.433	40561	Records are kept of daily coatings and solvent use and the actual hours of operation of each coating or stripping operation
Steam Boiler No. 1	106.183	53953	Heater combustion gas usage in tons per year is recorded
Steam Boiler No. 2	106.183	53953	Heater combustion gas usage in tons per year is recorded
WW-FLARE	106.492, 106.532	119335	Emissions are calculated based on projected gas flow rates and compositions provided by the equipment vendor and emission factors from TCEQ document "Flares and Vapor Oxidizers"
WW-FUG	106.492, 106.532	119335	Emissions are calculated based on projected gas flow rates and compositions provided by the equipment vendor and emission factors from TCEQ document "Flares and Vapor Oxidizers"
COTGASDRY1	106.183	9/4/2000	Heater combustion gas usage in tons per year is recorded
COTGASDRY4	106.183	9/4/2000	Heater combustion gas usage in tons per year is recorded
COTIRDRYR1	106.183	9/4/2000	Heater combustion gas usage in tons per year is recorded
COTIRDRYR3	106.183	9/4/2000	Heater combustion gas usage in tons per year is recorded
LBDRYER37	106.183	9/4/2000	Heater combustion gas usage in tons per year is recorded
LBDRYER38	106.183	9/4/2000	Heater combustion gas usage in tons per year is recorded
LBDRYER45	106.183	9/4/2000	Heater combustion gas usage in tons per year is recorded
LBDRYER46	106.183	9/4/2000	Heater combustion gas usage in tons per year is recorded
LBIRDRYR1	106.183	9/4/2000	Heater combustion gas usage in tons per year is recorded
COOLTOWER3	106.371	9/4/2000	Cooling tower chemical usage and operating hours are recorded
COATBLDG	106.433	3/14/1997	Records are kept of daily coatings and solvent use and the actual hours of operation of each coating or stripping operation
PTWASH1	106.454	11/1/2001	Solvent usage is recorded
PTWASH2	106.454	11/1/2001	Solvent usage is recorded
DSL-ULOAD	106.472	9/4/2000	Tank throughput is recorded and emissions calculated using emission factors from EPA AP-12
LMFWENG1	106.511	3/14/1997	Engine runtime is recorded
MMFWENG1	106.511	3/14/1997	Engine runtime is recorded
WASTEWATER	106.532	3/14/1997	Annual observation of equipment/activities to confirm negligible emissions

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

Date:	04/26/2024
Permit No.:	O2979
RN No.:	RN100754779

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

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

<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: September 4, 2000
<del>PBR No.: 106.263</del>	<del>Version No./Date: November 1, 2001</del>
PBR No.: 106.371	Version No./Date: September 4, 2000
<del>PBR No.: 106.412</del>	<del>Version No./Date: September 4, 2000</del>
PBR No.: 106.433	Version No./Date: March 14, 1997
PBR No.: 106.433	Version No./Date: September 4, 2000
PBR No.: 106.454	Version No./Date: November 1, 2001
<del>PBR No.: 106.471</del>	<del>Version No./Date: September 4, 2000</del>
PBR No.: 106.472	Version No./Date: September 4, 2000
<del>PBR No.: 106.473</del>	<del>Version No./Date: September 4, 2000</del>
PBR No.: 106.492	Version No./Date: September 4, 2000
PBR No.: 106.511	Version No./Date: March 14, 1997
<del>PBR No.: 106.511</del>	<del>Version No./Date: September 4, 2000</del>
PBR No.: 106.532	Version No./Date: March 14, 1997
PBR No.: 106.532	Version No./Date: September 4, 2000
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:



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

Table 1a: Additions

Date: 4/26/2024	Regulated Entity No.: RN100754779	Permit No.: 02979
Company Name: Smurfit Kappa North America LLC	Area Name: Forney Mill	

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)
3	WBLR	OP-UA06	60Db	NOx	40 CFR Part 60, Subpart Db	§60.44b(d) §60.44b(h), (i) §60.46b(a)

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

**Table 1b: Additions**

<b>Date:</b> 4/26/2024	<b>Regulated Entity No.:</b> RN100754779	<b>Permit No.:</b> 02979
<b>Company Name:</b> Smurfit Kappa North America LLC	<b>Area Name:</b> Forney Mill	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
3	WBLR	60Db	NOx	§60.46b(c), [T](e), [T](e)(1) [G]§60.48b(b), (c)-(e), [G](e)(2) §60.48b(e)(3), (f)	[G]§60.48b(b), (c) [G]§60.49b(d), [G](g), (o)	§60.49b(a), (a)(1)-(3) §60.49b(b), (i), (v), (w)

**Table 3a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**  
**Subpart Db: Standards of Performance for Industrial-Commercial Steam Generating Units**

[illegible]

Table 3b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)  
Subpart Db: Standards of Performance for Industrial-Commercial Steam Generating Units

[illegible]

**Table 3c: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**  
**Subpart Db: Standards of Performance for Industrial-Commercial Steam Generating Units**

[illegible]

Table 3d: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)  
Subpart Db: Standards of Performance for Industrial-Commercial Steam Generating Units

[illegible]

Table 3e: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)  
Subpart Db: Standards of Performance for Industrial-Commercial Steam Generating Units

[illegible]

Emily L. Knodell  
Permit Reviewer  
TCEQ – APD – OP Section (Title V)  
(512) 239-3107



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---

**From:** Eddie Quintanilla <[Heriberto.Quintanilla@trinityconsultants.com](mailto:Heriberto.Quintanilla@trinityconsultants.com)>

**Sent:** Friday, April 26, 2024 2:00 PM

**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>

**Cc:** Kyle, Madison <[Madison.Kyle@smurfitkappa.com](mailto:Madison.Kyle@smurfitkappa.com)>; Jon Taliaferro <[Jon.Taliaferro@trinityconsultants.com](mailto:Jon.Taliaferro@trinityconsultants.com)>

**Subject:** RE: Working Draft Permit -- FOP O2979/Project 35869, Smurfit Kappa North America LLC/Smurfit Kappa North America Forney Mill

Good afternoon Emily,

Thank you for the extension! We have reviewed the WDP and have the following comments:

1. Term and Condition 11 is missing under the New Source Review Authorization Requirements section. See attached the latest form OP-PBRSUP
2. NOx requirements are missing for unit CHP, index numbers R7400-1, R7400-2, and 60KKKK
3. We would like to revise the OP-UA06 originally submitted. See attached the form OP-UA06. Attached also is the form OP-REQ3 which details the NOx requirements for unit WBLR, index number 60DB that we want. Using the UA codes, the Main Standard should be § 60.44b(d).
  - a. We think there is an issue with TCEQ's interpretation of § 60.44b(d). TCEQ interpreted that units constructed after 7/9/1997 must comply with § 60.44b(l)(1) instead of (d). This is true for other special fuel combo limits like in (c) and (e). But (d) doesn't have the language "Except as provided under paragraph (l) of this section,..." like (c) and (e)
  - b. See also attached an email conversation between Madison Aalund, Sarah Molloy, and I. At first, I thought that the NSPS Db flowchart page 43 had a problem, but actually the problem is in page 40. Feel free to send them the justification above to make the necessary changes to the flowchart
4. We would like to make changes to the PBRs incorporated in the permit. See attached the form OP-REQ1 page 88.
5. Correct the PBR pre-construction authorization for unit COOLTOWER3. It is currently PBR 106.371, version no.: 09/01/2017. It should be version no.: 09/04/2000

Let me know if you have any questions!

**Heriberto "Eddie" Quintanilla, P.E.**  
Staff Consultant



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---

**From:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Sent:** Wednesday, April 17, 2024 8:13 AM  
**To:** Eddie Quintanilla <[Heriberto.Quintanilla@trinityconsultants.com](mailto:Heriberto.Quintanilla@trinityconsultants.com)>  
**Cc:** Kyle, Madison <[Madison.Kyle@smurfitkappa.com](mailto:Madison.Kyle@smurfitkappa.com)>; Jon Taliaferro <[Jon.Taliaferro@trinityconsultants.com](mailto:Jon.Taliaferro@trinityconsultants.com)>  
**Subject:** RE: Working Draft Permit -- FOP O2979/Project 35869, Smurfit Kappa North America LLC/Smurfit Kappa North America Forney Mill

Good morning Eddie,

I approve this extension, please review the WDP and submit to me any comments you have by **April 26, 2024.**

Best Regards,

Emily L. Knodell  
Permit Reviewer  
TCEQ – APD – OP Section (Title V)  
(512) 239-3107



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**From:** Eddie Quintanilla <[Heriberto.Quintanilla@trinityconsultants.com](mailto:Heriberto.Quintanilla@trinityconsultants.com)>  
**Sent:** Monday, April 15, 2024 4:31 PM  
**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Cc:** Kyle, Madison <[Madison.Kyle@smurfitkappa.com](mailto:Madison.Kyle@smurfitkappa.com)>; Jon Taliaferro <[Jon.Taliaferro@trinityconsultants.com](mailto:Jon.Taliaferro@trinityconsultants.com)>  
**Subject:** RE: Working Draft Permit -- FOP O2979/Project 35869, Smurfit Kappa North America LLC/Smurfit Kappa North America Forney Mill

Hey Emily,

We would like to request an extension to your 04/19/2024 deadline to properly review the draft permit.

Let me know if you need additional information,

**Heriberto "Eddie" Quintanilla, P.E.**

Staff Consultant

Trinity Consultants

9737 Great Hills Trail, Ste. 340, Austin, TX 78759

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**From:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>

**Sent:** Friday, March 22, 2024 6:37 AM

**To:** Eddie Quintanilla <[Heriberto.Quintanilla@trinityconsultants.com](mailto:Heriberto.Quintanilla@trinityconsultants.com)>

**Cc:** Jon Taliaferro <[Jon.Taliaferro@trinityconsultants.com](mailto:Jon.Taliaferro@trinityconsultants.com)>; Kyle, Madison  
<[Madison.Kyle@smurfitkappa.com](mailto:Madison.Kyle@smurfitkappa.com)>

**Subject:** RE: Working Draft Permit -- FOP O2979/Project 35869, Smurfit Kappa North America  
LLC/Smurfit Kappa North America Forney Mill

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Hello Eddie,

Sure, no problem. Please see attached.

Best Regards,

Emily L. Knodell

Permit Reviewer

TCEQ – APD – OP Section (Title V)

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**From:** Eddie Quintanilla <[Heriberto.Quintanilla@trinityconsultants.com](mailto:Heriberto.Quintanilla@trinityconsultants.com)>  
**Sent:** Thursday, March 21, 2024 4:21 PM  
**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Cc:** Jon Taliaferro <[Jon.Taliaferro@trinityconsultants.com](mailto:Jon.Taliaferro@trinityconsultants.com)>; [madison.kyle@smurfitkappa.com](mailto:madison.kyle@smurfitkappa.com)  
**Subject:** RE: Working Draft Permit -- FOP O2979/Project 35869, Smurfit Kappa North America LLC/Smurfit Kappa North America Forney Mill

Hey Emily,

Thank you for the prompt response. Would you mind sharing a Word version of the effective permit? That would make my review of the WDP go by easier.

Thanks!

**Heriberto "Eddie" Quintanilla, P.E.**  
Staff Consultant

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**From:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Sent:** Thursday, March 21, 2024 3:11 PM  
**To:** Eddie Quintanilla <[Heriberto.Quintanilla@trinityconsultants.com](mailto:Heriberto.Quintanilla@trinityconsultants.com)>  
**Cc:** Jon Taliaferro <[Jon.Taliaferro@trinityconsultants.com](mailto:Jon.Taliaferro@trinityconsultants.com)>; [madison.kyle@smurfitkappa.com](mailto:madison.kyle@smurfitkappa.com)  
**Subject:** Working Draft Permit -- FOP O2979/Project 35869, Smurfit Kappa North America LLC/Smurfit Kappa North America Forney Mill

Good afternoon Eddie,

Happy to hear from you as well! Thank you for sending the updates.

I have conducted a technical review of *renewal* application for *Smurfit Kappa North America LLC/Smurfit Kappa North America Forney Mill*. 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, and any updates provided.

Please review the WDP and submit to me any comments you have by **April 19, 2024.**

Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

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\\_facsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_facsheet.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.

Please notify me when these updates have been submitted.

**As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at [R6AirPermitsTX@epa.gov](mailto:R6AirPermitsTX@epa.gov) and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at [Where to Submit FOP Applications and Permit-Related Documents](#).**

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,

Emily L. Knodell  
Permit Reviewer  
TCEQ – APD – OP Section (Title V)  
(512) 239-3107



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**Texas Commission on Environmental Quality**  
**Monitoring Requirements**  
**Form OP-MON (Page 3)**  
**Federal Operating Permit Program**  
**Table 1c: CAM/PM Case-By-Case Additions**

<b>I. Identifying Information</b>		
Account No.:	RN No.: RN100754779	CN: CN603424292
Permit No: O2979		Project No.: 35869
Area Name: Forney Hill		
Company Name: Smurfit Kappa North America LLC		
<b>II. Unit/Emission Point/Group/Process Information</b>		
Revision No.: 4		
Unit/EPN/Group/Process ID No.: CHP		
Applicable Form: OP-UA11		
<b>III. Applicable Regulatory Requirement</b>		
Name: 30 TAC Chapter 117, Subchapter B		
SOP/GOP Index No.: R7400-1 & 2		
Pollutant: CO		
Main Standard: § 117.410(c)(1)		
Monitoring Type: PM		
Unit Size:		
Deviation Limit: Maximum CO concentration of 400 ppmv at 3% O <sub>2</sub> , dry basis		
<b>IV. Control Device Information</b>		
Control Device ID No.:		
Device Type:		
<b>V. CAM Case-by-case</b>		
Indicator:		
Minimum Frequency:		
Averaging Period:		
QA/QC Procedures:		
Verification Procedures:		
Representative Date:		
<b>VI. Periodic Monitoring Case-by-case</b>		
Indicator: CO concentration		Minimum Frequency: Annual
Averaging Period: Hourly		
Periodic Monitoring Text: See below		

**Periodic Monitoring Text:** Monitor the carbon monoxide concentration per EPA Reference Method 10 and ASTM D6348 sampling methods using FTIR/NDIR analysis methods. The monitoring instrumentation shall be maintained, calibrated, and operated in accordance with the manufacturer's specifications or other written procedures. The monitoring shall be conducted at least annually. All monitoring data shall be recorded. If the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2).

**Statement of Basis:** It is widely practiced and accepted to calibrate and use a portable analyzer or other instrumentation to measure CO concentration with procedures such as EPA Test Method 10 or a CO CEMS. Additional sampling methods such as ASTM D6348 have been approved in federal rules. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. In addition, if the CO concentration is too high it shows that a control device such as a catalytic converter is not functioning properly or an emission unit is not obtaining complete combustion.

Texas Commission on Environmental Quality  
Boiler/Steam Generator/Steam Generating Unit Attributes  
Form OP-UA6 (Page 13)

## Federal Operating Permit Program

**Table 5a: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)**

## Subpart B: Combustion Control at Major Industrial, Commercial and Institutional Sources in Ozone Nonattainment Areas

Date	Permit No.	Regulated Entity No.
TBD	02979	RN100754779

[illegible]

Texas Commission on Environmental Quality  
Boiler/Steam Generator/Steam Generating Unit Attributes  
Form OP-UA6 (Page 14)

Federal Operating Permit Program

Table 5b: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)

Subpart B: Combustion Control at Major Industrial, Commercial and  
Institutional Sources in Ozone Nonattainment Areas

Date	Permit No.	Regulated Entity No.
TBD	02979	RN100754779

Unit ID No.	SOP Index No.	NO <sub>x</sub> Emission Limitation	Opt-In Unit	23C-Option	Title 30 TAC Chapter 116 Permit Limit	EGF System Cap Unit	NO <sub>x</sub> Emission Limit Average	NO <sub>x</sub> Reduction	Common Stack Combined
BOILER3	R7400	SC		23C-A			30/24	FRCFG	



Texas Commission on Environmental Quality  
Boiler/Steam Generator/Steam Generating Unit Attributes  
Form OP-UA6 (Page 15)

Federal Operating Permit Program

Table 5c: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)

Subpart B: Combustion Control at Major Industrial, Commercial and  
Institutional Sources in Ozone Nonattainment Areas

Date	Permit No.	Regulated Entity No.
TBD	02979	RN100754779

Unit ID No.	SOP Index No.	Fuel Type Heat Input	NO <sub>x</sub> Monitoring System	Fuel Flow Monitoring	CO Emission Limitation	CO Monitoring System	NH <sub>3</sub> Emission Limitation	NH <sub>3</sub> Emission Monitoring
BOILER3	R7400		CEMS	X40A	410C	CEMS		

---

**From:** Eddie Quintanilla <[Heriberto.Quintanilla@trinityconsultants.com](mailto:Heriberto.Quintanilla@trinityconsultants.com)>

**Sent:** Thursday, March 7, 2024 4:26 PM

**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>

**Cc:** Jon Taliaferro <[Jon.Taliaferro@trinityconsultants.com](mailto:Jon.Taliaferro@trinityconsultants.com)>; [madison.kyle@smurfitkappa.com](mailto:madison.kyle@smurfitkappa.com)

**Subject:** RE: Technical Review -- FOP O2979/Project 35869, Smurfit Kappa North America LLC/Smurfit Kappa North America Forney Mill

Good afternoon Emily,

Happy to hear from you! Thank for your email. On behalf of Smurfit Kappa, see our responses below in red.

Let me know if you need anything else. Thanks!

**Heriberto "Eddie" Quintanilla, P.E.**

Staff Consultant

Trinity Consultants

9737 Great Hills Trail, Ste. 340, Austin, TX 78759

Office: 737-284-0687

[heriberto.quintanilla@trinityconsultants.com](mailto:heriberto.quintanilla@trinityconsultants.com)



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**From:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>

**Sent:** Friday, March 1, 2024 3:02 PM

**To:** Kyle, Madison <[Madison.Kyle@smurfitkappa.com](mailto:Madison.Kyle@smurfitkappa.com)>; [jon.taliaferro@trinityconsultants.com](mailto:jon.taliaferro@trinityconsultants.com)

**Subject:** Technical Review -- FOP O2979/Project 35869, Smurfit Kappa North America LLC/Smurfit Kappa North America Forney Mill

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

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Good afternoon,

During technical review, the following issues were found. Please resolve the following by **03/08/2024**.

- 1.) **Form OP-MON:** Additional periodic monitoring is required to be documented in the permit for Unit ID **CHP**, SOP Index Nos. R7400-1, R7400-2 for Main Standard §117.410(c)(1) for pollutant CO. Please submit Form OP-MON with one of the following periodic monitoring option (PM-C-001) or case-by-case periodic monitoring. **See attached an OP-MON adding a case-by-case PM to unit**

CHP for both Chapter 117 index numbers. The monitoring is similar to a previously approved PM for another permit (O3868).

- 2.) **Form OP-UA06:** This form has been updated since the last renewal and may now require new answers. Please send an updated OP-UA06, ensuring it is the most recent version of the form. The date is located in the bottom left hand corner of the page. This one should say "09/23". The unit requiring the update is BOILER3, Index No. R7400 for Regulation 30 TAC Chapter 117, Subchapter B. **See attached an updated OP-UA06 Table 5. The most recent version of the form was used.**

Please let me know if you have any questions, thank you!

Best Regards,

Emily L. Knodell  
Permit Reviewer  
TCEQ – APD – OP Section (Title V)  
(512) 239-3107



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

3.)

Please let me know if you have any questions, thank you.

Best Regards,

Emily L. Knodell  
Permit Reviewer  
TCEQ – APD – OP Section (Title V)  
(512) 239-3107



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**From:** Emily Knodell

**Sent:** Friday, November 17, 2023 5:01 PM

**To:** [madison.Kyle@smurfitkappa.com](mailto:madison.Kyle@smurfitkappa.com); [jon.taliaferro@trinityconsultants.com](mailto:jon.taliaferro@trinityconsultants.com)

**Subject:** Technical Review -- FOP O2979/Project 35869, Smurfit Kappa North America LLC/Smurfit Kappa North America Forney Mill

Good evening,

My name is Emily Knodell and I have been assigned to the Federal Operating Permit (FOP) *renewal* permit application of Permit No. **02979** for *Smurfit Kappa North America LLC/Smurfit Kappa North America Forney Mill*. This application has been assigned Project No. **35869**. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

In addition, I wanted to let you know that EPA has, on occasion, objected to Title V permits based on the following:

- a. NSR permit and PBR monitoring sufficiency –please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient.
- b. Reference to confidential business information (CBI) in NSR permits and PBR submittals.
- c. High level terms in the SOP Applicable Requirement Summary Table. The high level terms are sometimes used in SOPs when unit attribute forms have not yet been updated due to regulatory amendments.
- d. Accuracy of PBR information provided on the supplemental table and in the permit – please refer to Forms OP-PBRSUP and OP-REQ1 Instructions.

If you have any questions or concerns on any of these items or think you need to do any additional updates, let me know and we can discuss further.

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.

Please review the “SOP Technical Review Fact Sheet” located at [http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_facsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_facsheet.pdf). This guidance contains important information regarding the review process and application update procedures. 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,

**Emily L. Knodell**

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

Phone: (512) 239-3107  
Fax: (512) 239-1400



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

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**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: <b>Smurfit Kappa North America LLC</b>
B. Customer Reference Number (CN): <b>CN603424292</b>
C. Submittal Date (mm/dd/yyyy): <b>08/28/2024</b>
<b>II. Site Information</b>
A. Site Name: <b>Forney Mill</b>
B. Regulated Entity Reference Number (RN): <b>RN100754779</b>
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 type="checkbox"/> VOC <input checked="" type="checkbox"/> NO <sub>x</sub> <input checked="" type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> PM <sub>10</sub> <input checked="" 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 type="checkbox"/> YES <input checked="" 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 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 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 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 type="checkbox"/> YES <input type="checkbox"/> NO</span>
<b>E.</b> Has the required Public Involvement Plan been included with this application? <span style="float: right;"><input 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: <b>Robert Brown</b>
RO Title: <b>VP of Mills</b>
Employer Name: <b>Smurfit Kappa North America</b>
Mailing Address: <b>P.O. Box 847</b>
City: <b>Forney</b>
State: <b>TX</b>
ZIP Code: <b>75126</b>
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.: <b>(214) 515-6400</b>
Fax No.:
Email: <b>Bob.Brown@smurfitkappa.com</b>

**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: <b>Hunter Beene</b>
Technical Contact Title: <b>Process Engineer</b>
Employer Name: <b>Smurfit Westrock</b>
Mailing Address: <b>855 E US Hwy 80</b>
City: <b>Forney</b>
State: <b>TX</b>
ZIP Code: <b>75126</b>
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.: <b>(972) 336-3517</b>
Fax No.:
Email: <b>hunter.beene@smurfitwestrock.com</b>
<b>VIII. Reference Only Requirements</b> <i>(For reference only.)</i>
<b>A. State Senator: Senator Bob Hall, Texas Senate District 2</b>
<b>B. State Representative: Representative Keith Bell, Texas House District 4</b>
<b>C. Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)?</b> <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A</span>
<b>D. Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322?</b> <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
<b>E. Indicate the alternate language(s) in which public notice is required:</b>



**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>
A. Office/Facility Name:
B. Physical Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
C. Physical Location:
D. Contact Name Prefix: ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Contact Full Name:
E. Telephone No.:
<b>X. Application Area Information</b>
A. Area Name: <b>Forney Plant</b>
B. Physical Address: <b>855 E Highway 80</b>
City: <b>Forney</b>
State: <b>TX</b>
ZIP Code: <b>75126</b>
C. Physical Location:
D. Nearest City: <b>Forney</b>
E. State: <b>TX</b>
F. ZIP Code: <b>75126</b>

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

<b>X. Application Area Information (continued)</b>
<b>G.</b> Latitude (nearest second): <b>32° 44' 20"</b>
<b>H.</b> Longitude (nearest second): <b>96° 26' 17"</b>
<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: <b>14</b>
<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: <b>Forney City Hall</b>
<b>B.</b> Physical Address: <b>101 E Main Street</b>
City: <b>Forney</b>
ZIP Code: <b>75126</b>
<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: <b>Hunter Beene</b>
Contact Mailing Address: <b>855 E US Hwy 80</b>
City: <b>Forney</b>
State: <b>TX</b>
ZIP Code: <b>75126</b>
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.: <b>(972) 336-3517</b>

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

**XII. Delinquent Fees and Penalties**

**Notice:** 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."

**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.**

**XIII. Designated Representative (DR) Identifying Information**

DR Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ 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  
Boiler/Steam Generator/Steam Generating Unit Attributes  
Form OP-UA6 (Page 6)

## Federal Operating Permit Program

**Table 3a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**

**Subpart Db: Standards of Performance for Industrial-Commercial Steam Generating Units**

Date	Permit No.	Regulated Entity No.
TBD	02979	RN100754779

[illegible]

Table 3b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)  
Subpart Db: Standards of Performance for Industrial-Commercial Steam Generating Units

[illegible]

Texas Commission on Environmental Quality  
Boiler/Steam Generator/Steam Generating Unit Attributes  
Form OP-UA6 (Page 8)

## Federal Operating Permit Program

**Table 3c: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**

**Subpart Db: Standards of Performance for Industrial-Commercial Steam Generating Units**

Date	Permit No.	Regulated Entity No.
TBD	02979	RN100754779

[illegible]

Texas Commission on Environmental Quality  
Boiler/Steam Generator/Steam Generating Unit Attributes  
Form OP-UA6 (Page 9)

## Federal Operating Permit Program

Table 3d: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

**Subpart Db: Standards of Performance for Industrial-Commercial Steam Generating Units**

Date	Permit No.	Regulated Entity No.
TBD	02979	RN100754779

[illegible]



Table 3e: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)  
Subpart Db: Standards of Performance for Industrial-Commercial Steam Generating Units

Date	Permit No.	Regulated Entity No.
TBD	02979	RN100754779

[illegible]

**Stationary Turbine Attributes**  
**Form OP-UA11 (Page 12)**  
**Federal Operating Permit Program**  
**Table 6a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**  
**Subpart KKKK: Stationary Combustion Turbines**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
TBD	02979	RN100754779

Unit ID No.	SOP Index No.	Unit Type	Construction/ Modification Date	Heat Input	Subject to Da	Service Type	NOx Standard	Fuel Type
CHP	60KKKK	CHPT	2005C	10-50	NO	NOTER	YES	NGO

**Table 6b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**  
**Subpart KKKK: Stationary Combustion Turbines**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
TBD	02979	RN100754779

[illegible]

**Stationary Turbine Attributes**  
**Form OP-UA11 (Page 14)**  
**Federal Operating Permit Program**  
**Table 6c: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**  
**Subpart KKKK: Stationary Combustion Turbines**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
TBD	02979	RN100754779

Unit ID No.	SOP Index No.	Location	SO <sub>2</sub> Standard	Fuel Monitoring	Fuel Quality	Performance Test	Intermediate Storage	Fuel Schedule
CHP	60KKKK	NO	YES			SAMP		NONE

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

Date:	TBD
Permit No.:	O2979
RN No.:	RN100754779

*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 type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	6. The application area includes structures subject to 30 TAC § 111.111(a)(7)(A).	<input checked="" type="checkbox"/> YES <input 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 checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆	8. Emissions from units in the application area include contributions from uncombined water.	<input checked="" type="checkbox"/> YES <input 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 checked="" type="checkbox"/> NO <input 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:	TBD
Permit No.:	O2979
RN No.:	RN100754779

*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. <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
◆	b. The application area is located within the Fort Bliss Military Reservation, except areas specified in 30 TAC § 111.141. <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
◆	c. The application area is located in the portion of Harris County inside the loop formed by Beltway 8. <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
◆	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. <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
<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. <span style="float: right;"><input type="checkbox"/> YES <input type="checkbox"/> NO</span>
◆	b. The application area is subject to 30 TAC § 111.145. <span style="float: right;"><input type="checkbox"/> YES <input type="checkbox"/> NO</span>
◆	c. The application area is subject to 30 TAC § 111.147. <span style="float: right;"><input type="checkbox"/> YES <input type="checkbox"/> NO</span>
◆	d. The application area is subject to 30 TAC § 111.149. <span style="float: right;"><input type="checkbox"/> YES <input type="checkbox"/> NO</span>
<b>C. Emissions Limits on Nonagricultural Processes</b>	
◆	1. The application area includes a nonagricultural process subject to 30 TAC § 111.151. <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>
	2. The application area includes a vent from a nonagricultural process that is subject to additional monitoring requirements. <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span> <i>If the response to Question I.C.2 is "NO," go to Question I.C.4.</i>
	3. All vents from nonagricultural process in the application area are subject to additional monitoring requirements. <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>

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<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 checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆ 2. Fire training is conducted in the application area and subject to the exception provided in 30 TAC § 111.205.	<input checked="" type="checkbox"/> YES <input 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 checked="" type="checkbox"/> YES <input 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>Form OP-REQ1: Page 4</b>	
<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 checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>



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<b>Form OP-REQ1: Page 5</b>	
<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 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 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 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 checked="" type="checkbox"/> YES <input 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>Form OP-REQ1: Page 6</b>	
<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 checked="" type="checkbox"/> YES <input 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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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**III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)**

**K. Cutback Asphalt**

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 checked="" type="checkbox"/> NO <input 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 checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
3.	Asphalt emulsion is used or produced within the application area.	<input type="checkbox"/> YES <input checked="" 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 checked="" 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

**L. Degassing of Storage Tanks, Transport Vessels and Marine Vessels**

◆	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 type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" 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 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 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 type="checkbox"/> NO
6. The application area has at least one vent stream which has no potential to emit HRVOC.	<input 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 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. 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. For GOP applications for GOP 517, if the response to Question IV.A.1 is "YES," complete Sections IV.C and IV.F. 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. If the response to Question IV.A.3 is "YES," go to Question IV.G.1. 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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<b>IV. Title 30 TAC Chapter 117 - Control of Air Pollution from Nitrogen Compounds (continued)</b>		
<b>C. Commercial, Institutional, and Industrial Sources in Ozone Nonattainment Areas</b>		
◆	<div>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.</div> <div><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></div>	<input checked="" type="checkbox"/> YES <input 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 checked="" 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 checked="" type="checkbox"/> NO
<b>D. Adipic Acid Manufacturing</b>		
	1. The application area is located at, or part of, an adipic acid production unit.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
<b>E. Nitric Acid Manufacturing - Ozone Nonattainment Areas</b>		
	1. The application area is located at, or part of, a nitric acid production unit.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
<b>F. Combustion Control at Minor Sources in Ozone Nonattainment Areas - Boilers, Process Heaters, Stationary Engines and Gas Turbines</b>		
◆	<div>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).</div> <div><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></div>	<input type="checkbox"/> YES <input checked="" 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 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 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 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 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 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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**V. Title 40 Code of Federal Regulations Part 59 (40 CFR Part 59) - National Volatile Organic Compound Emission Standards for Consumer and Commercial Products**

**A. Subpart B - National Volatile Organic Compound Emission Standards for Automobile Refinish Coatings**

- |   |   |
|---|---|
| 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.<br><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. Subpart C - National Volatile Organic Compound Emission Standards for Consumer Products**

- |  |   |
|--|---|
| 1. The application area manufactures consumer products for sale or distribution in the United States.  | <input 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.<br><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 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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**VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)**

**E. Subpart LLL - Standards of Performance for Onshore Natural Gas Processing: Sulfur Dioxide (SO<sub>2</sub>) Emissions (continued)**

◆	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.	

**F. Subpart OOO - Standards of Performance for Nonmetallic Mineral Processing Plants**

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

**G. Subpart QQQ - Standards of Performance for VOC Emissions from Petroleum Refinery Wastewater Systems**

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>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 checked="" type="checkbox"/> NO <input 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 checked="" type="checkbox"/> NO

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

**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)**

◆	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

**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**

◆	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 checked="" type="checkbox"/> NO <input 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 checked="" 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 checked="" type="checkbox"/> NO <input 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 checked="" 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>Form OP-REQ1: Page 25</b>	
<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>	<input type="checkbox"/> 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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>C. Subpart J - National Emission Standard for Benzene Emissions for Equipment Leaks (Fugitive 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>Form OP-REQ1: Page 26</b>	
<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>Applicability</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>Roadway Construction</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>Manufacturing Commercial Asbestos</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>Form OP-REQ1: Page 27</b>	
<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.	<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
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	<input type="checkbox"/> YES <input type="checkbox"/> NO
g. The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<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>Form OP-REQ1: Page 28</b>	
<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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
e. Asbestos-containing waste material is adequately wetted.	<input type="checkbox"/> YES <input type="checkbox"/> NO
f. Alternative filtering equipment is being used that has received EPA approval.	<input type="checkbox"/> YES <input type="checkbox"/> NO
g. A HEPA filter is being used that is certified to be at least 99.97% efficient for 0.3 micron particles.	<input type="checkbox"/> YES <input type="checkbox"/> NO
h. The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
g. The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<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>Form OP-REQ1: Page 30</b>	
<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>Form OP-REQ1: Page 31</b>	
<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>Form OP-REQ1: Page 32</b>	
<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>	<input type="checkbox"/> YES <input type="checkbox"/> NO
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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
24. 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
<i>Remediation Activities</i>	
25. Remediation activities take place at the application area subject to 40 CFR Part 61, Subpart FF.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<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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**VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)**

**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**

***Applicability***

- |    |  |  |
|----|--|--|
| 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.<br><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.<br><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.<br><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 |

***Vapor Collection and Closed Vent Systems***

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

**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)**

***Process Wastewater Streams (continued)***

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>Form OP-REQ1: Page 38</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>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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**VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)**

**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)**

***Drains***

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>Form OP-REQ1: Page 41</b>	
<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 checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. Chromium-based water treatment chemicals have been used on or after September 8, 1994.	<input type="checkbox"/> YES <input checked="" 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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**VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)**

**G. Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) (continued)**

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>	<input type="checkbox"/> YES <input type="checkbox"/> NO
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>	<input type="checkbox"/> YES <input type="checkbox"/> NO
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>	<input type="checkbox"/> YES <input type="checkbox"/> NO
7.	Emissions screening factor less than 0.5 (ET or EP < 0.5). <i>If the response to Question VIII.G.7 is "YES," go to Section VIII.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
8.	Emissions screening factor greater than or equal to 0.5, but less than 1.0 (0.5 ≤ ET or EP < 1.0). <i>If the response to Question VIII.G.8 is "YES," go to Section VIII.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
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>	<input type="checkbox"/> YES <input type="checkbox"/> NO
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>	<input type="checkbox"/> YES <input type="checkbox"/> NO
11.	The application area is using an alternative leak monitoring program as described in 40 CFR § 63.424(f).	<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)**

**H. Subpart S - National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry**

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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<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>	
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>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>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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<b>Form OP-REQ1: Page 50</b>	
<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>	
9. The application area includes Group 1 or Group 2 wastewater streams that are complying with 40 CFR § 63.640(o)(2)(ii). <i>If the response to Question VIII.N.9 is "NO," go to Section VIII.O.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Containers, Drains, and other Appurtenances</b>	
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).	<input type="checkbox"/> YES <input type="checkbox"/> 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).	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>O. Subpart DD - National Emission Standards for Off-site Waste and Recovery Operations</b>	
1. The application area receives material that meets the criteria for off-site material as specified in 40 CFR § 63.680(b)(1). <i>If the response to Question VIII.O.1 is "NO" or "N/A," go to Section VIII.P</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. Materials specified in 40 CFR § 63.680(b)(2) are received at the application area.	<input type="checkbox"/> YES <input type="checkbox"/> 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.	<input type="checkbox"/> YES <input type="checkbox"/> 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 type="checkbox"/> YES <input checked="" 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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**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)**

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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<b>Form OP-REQ1: Page 61</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>	
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>Form OP-REQ1: Page 62</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>	
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>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>Form OP-REQ1: Page 66</b>	
<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 an 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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**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)**

***Drains (continued)***

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

**AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)**

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>Form OP-REQ1: Page 73</b>	
<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>Form OP-REQ1: Page 74</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 BBBBBB - 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 BBBBBB, 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 BBBBBB.	<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 BBBBBB. <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 BBBBBB, 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 BBBBBB - 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 checked="" type="checkbox"/> YES <input 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 checked="" 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 checked="" 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 checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆ 2. Provide the Subpart designation (i.e. Subpart EEE) in the space provided below. <b>40 CFR Part 63 Subpart JJJJJ</b>	

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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 checked="" type="checkbox"/> YES <input 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.
	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆	2. Disposal of appliances (including motor vehicle air conditioners) or refrigerant or non-exempt substitute reclamation occurs in the application area.
	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
◆	3. The application area manufactures appliances or refrigerant recycling and recovery equipment.
	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
<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>
	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
◆	2. All substitutes produced by the application area meet one or more of the exemptions in 40 CFR § 82.176(b)(1) - (7).
	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
<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.
	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
◆	2. Disposal of halons or manufacturing of halon blends is conducted in the application area.
	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
<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.
	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

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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 checked="" type="checkbox"/> YES <input 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>40 CFR Part 63 Subpart JJJJJJ</b>	
<b>C. Emission Limitation Certifications</b>	
◆ 1. The application area includes units for which federally enforceable emission limitations have been established by certification.	<input type="checkbox"/> YES <input checked="" 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 type="checkbox"/> NO

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<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 checked="" type="checkbox"/> YES <input 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 checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A

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<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 type="checkbox"/> YES <input checked="" 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 checked="" type="checkbox"/> YES <input 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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*For SOP applications, answer ALL questions unless otherwise directed.*

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

**Form OP-REQ1: Page 83**

**XI. Miscellaneous (continued)**

**L. Compliance Assurance Monitoring**

◆	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. <i>If the response to Question XI.L.1 is "NO," go to Section XI.M.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆	2. The unit or units defined by XI.L.1 are using a control device to comply with an applicable requirement. <i>If the response to Question XI.L.2 is "NO," go to Section XI.M.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆	3. The permit holder has submitted a CAM proposal on Form OP-MON in a previous application.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆	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. <i>If the responses to Questions XI.L.3 and XI.L.4 are both "NO," go to Section XI.M.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	5. The owner/operator or permit holder is submitting a CAM implementation plan and schedule to be incorporated as enforceable conditions in the permit.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	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.	
◆	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).	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆	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). <i>If the response to Question XI.L.8 is "YES," go to Section XI.M.</i>	<input checked="" 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:	TBD
Permit No.:	O2979
RN No.:	RN100754779

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

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

**Form OP-REQ1: Page 84**

**XI. Miscellaneous (continued)**

**L. Compliance Assurance Monitoring (continued)**

◆	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 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 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 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 type="checkbox"/> NO

**M. Title 30 TAC Chapter 113, Subchapter D, Division 5 - Emission Guidelines and Compliance Times**

◆	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 checked="" type="checkbox"/> NO <input 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

**XII. New Source Review (NSR) Authorizations**

**A. Waste Permits with Air Addendum**

◆	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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**Texas Commission on Environmental Quality**  
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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 checked="" type="checkbox"/> YES <input 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" type="checkbox"/> NO

**Texas Commission on Environmental Quality**  
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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 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 checked="" 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 checked="" 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 checked="" 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 checked="" type="checkbox"/> NO
◆ 15. The application area includes at least one "Boiler" Air Quality Standard Permit NSR authorization.	<input checked="" 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 checked="" 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

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

Date:	TBD
Permit No.:	O2979
RN No.:	RN100754779

*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):	
<i>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>.</i>			
<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):	
<i>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>.</i>			
<b>G. NSR Authorizations with FCAA § 112(g) Requirements</b>			
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:	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.: 23890	Issuance Date: 9/8/2023	Authorization No.: 152433	Issuance Date: 8/7/2018
Authorization No.: 77162	Issuance Date: 8/11/2015	Authorization No.:	Issuance Date:
Authorization No.: 80892	Issuance Date: 7/20/2017	Authorization No.:	Issuance Date:
Authorization No.: 84013	Issuance Date: 4/11/2017	Authorization No.:	Issuance Date:

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

Date:	TBD
Permit No.:	O2979
RN No.:	RN100754779

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

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

<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.: 106.433	Version No./Date: September 4, 2000
PBR No.: 106.183	Version No./Date: September 4, 2000
PBR No.: 106.492	Version No./Date: September 4, 2000
PBR No.: 106.532	Version No./Date: September 4, 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:
◆ <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:

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

<b>Date:</b> TBD	<b>Regulated Entity No.:</b> RN100754779	<b>Permit No.:</b> O2979
<b>Company Name:</b> Smurfit Kappa North America LLC		<b>Area Name:</b> Forney Mill

- 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)	
<b>1.</b> 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
<b>2.</b> 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
<b>3.</b> 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>	
<p><small>* 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.</small></p> <p><small>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.</small></p>	

**Federal Operating Permit Program  
Application for Permit Revision/Renewal  
Form OP-2-Table 1  
Texas Commission on Environmental Quality**

Date:	TBD														
Permit No.:	O2979														
Regulated Entity No.:	RN100754779														
Company Name:	Smurfit Kappa North America LLC														
For Submissions to EPA															
Has an electronic copy of this application been submitted (or is being submitted) to EPA?										X	YES		NO		
<b>I. Application Type</b>															
Indicate the type of application:															
X	Renewal														
X	Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)														
	Significant Revision														
	Revision Requesting Prior Approval														
	Administrative Revision														
	Response to Reopening														
<b>II. Qualification Statement</b>															
For SOP Revisions Only										X	YES		NO		
For GOP Revisions Only											YES		NO		
<b>III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)</b>															
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>															
	VOC	X	NO <sub>x</sub>	X	SO <sub>2</sub>		PM <sub>10</sub>	X	CO		Pb		HAPs		
Other:															
<b>IV. Reference Only Requirements (For reference only)</b>															
Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)?										X	YES		NO		N/A
<b>V. Delinquent Fees and Penalties</b>															
Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.															

**Federal Operating Permit Program  
Application for Permit Revision/Renewal  
Form OP-2-Table 2  
Texas Commission on Environmental Quality**

Date:	TBD
Permit No.:	02979
Regulated Entity No.:	RN100754779
Company Name:	Smurfit Kappa North America LLC

Using the table below, provide a description of the revision.

[illegible]

**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: Smurfit Kappa North America LLC
B. Customer Reference Number (CN): <b>CN603424292</b>
C. Submittal Date (mm/dd/yyyy): <i>TBD</i>
<b>II. Site Information</b>
A. Site Name: Forney Mill
B. Regulated Entity Reference Number (RN): <b>RN100754779</b>
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 type="checkbox"/> VOC <input checked="" type="checkbox"/> NO <sub>x</sub> <input checked="" type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> PM <sub>10</sub> <input checked="" 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 type="checkbox"/> YES <input checked="" 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 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 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 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 type="checkbox"/> YES <input type="checkbox"/> NO</span>
<b>E.</b> Has the required Public Involvement Plan been included with this application? <span style="float: right;"><input 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: Robert Brown
RO Title: VP of Mills
Employer Name: Smurfit Kappa North America
Mailing Address: P.O. Box 847
City: Forney
State: TX
ZIP Code: 75126
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (214) 515-6400
Fax No.:
Email: Bob.Brown@smurfitkappa.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 type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input checked="" type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Technical Contact Full Name: Madison Kyle
Technical Contact Title: Environmental Engineer
Employer Name: Smurfit Kappa North America
Mailing Address: P.O. Box 847
City: Forney
State: TX
ZIP Code: 75126
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (469) 344-1514
Fax No.:
Email: Madison.Kyle@smurfitkappa.com
<b>VIII. Reference Only Requirements</b> <i>(For reference only.)</i>
<b>A.</b> State Senator: Senator Bob Hall, Texas Senate District 2
<b>B.</b> State Representative: Representative Keith Bell, Texas House District 4
<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 type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
<b>E.</b> Indicate the alternate language(s) in which public notice is required:

**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>
A. Office/Facility Name:
B. Physical Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
C. Physical Location:
D. Contact Name Prefix: ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Contact Full Name:
E. Telephone No.:
<b>X. Application Area Information</b>
A. Area Name: Forney Plant
B. Physical Address: 855 E Highway 80
City: Forney
State: TX
ZIP Code: 75126
C. Physical Location:
D. Nearest City: Forney
E. State: TX
F. ZIP Code: 75126

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

<b>X. Application Area Information (continued)</b>
<b>G.</b> Latitude (nearest second): 32° 44' 20"
<b>H.</b> Longitude (nearest second): 96° 26' 17"
<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 checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>
<b>J.</b> Indicate the estimated number of emission units in the application area: 14
<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> (Complete this section for SOP Applications and Acid Rain Permit Applications only.)
<b>A.</b> Name of a public place to view application and draft permit: Forney City Hall
<b>B.</b> Physical Address: 101 E Main Street
City: Forney
ZIP Code: 75126
<b>C.</b> Contact Person (Someone who will answer questions from the public during the public notice period):
Contact Name Prefix: ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input checked="" type="checkbox"/> Ms. <input type="checkbox"/> Dr.):
Contact Person Full Name: Madison Kyle
Contact Mailing Address: P.O. Box 847
City: Forney
State: TX
ZIP Code: 75126
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.: (469) 344-1514

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

**XII. Delinquent Fees and Penalties**

**Notice:** 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."

**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.**

**XIII. Designated Representative (DR) Identifying Information**

DR Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ 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:

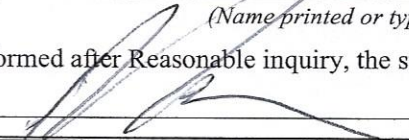
Telephone No.:

Fax No.:

Email:

**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.: KB0156B	RN: RN100754779	CN: CN603424292
Permit No.: O2979	Area Name: Forney Mill	
Company Name: Smurfit Kappa North America 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: Robert Brown		
Title: VP of Mills	Appointment Effective Date: 10/04/2023	
Telephone No.: (214) 515-6400	Fax No.:	
Company Name: Smurfit Kappa North America LLC		
Mailing Address: PO Box 847		
City: Forney	State: Texas	ZIP Code: 75126
E-mail Address: Bob.Brown@smurfitkappa.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>ROBERT BROWN</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: <u>10/4/2023</u>

10/24/2023

Texas Commission on Environmental Quality  
Air Permits Initial Review Team (APIRT), MC 161  
12100 Park 35 Circle, Building C, Third Floor, Austin, Texas 78753  
Austin, Texas 78753

*RE: Smurfit Kappa North America LLC  
Forney Mill, Kaufman County  
CN603424292; RN100754779  
Operating Permit O-2979  
Renewal and Streamlined Revision Application*

Dear Sirs or Madams:

Trinity Consultants is submitting this renewal and streamlined revision application for Title V Operating Permit O-2979 on behalf of Smurfit Kappa North America for the Forney Mill Site. Retrospective updates to three units (ID No.: BOILER3, CHP, and WBLR) are included with the renewal as streamlined revisions to correct each unit's emission limits and unit attribute codes.

Copies of this application have been sent to the TCEQ Region 4 Office along with an electronic copy to EPA Region 6. If you have any questions or comments about the information presented in this letter, please do not hesitate to call me at 361.215.9994 or email to [jon.taliaferro@trinityconsultants.com](mailto:jon.taliaferro@trinityconsultants.com).

Sincerely,

TRINITY CONSULTANTS

A handwritten signature in black ink, appearing to read "Jon Taliaferro". The signature is fluid and cursive, with the first name "Jon" and last name "Taliaferro" clearly distinguishable.

Jon Taliaferro  
Consultant

Attachments

cc: Regional Director, TCEQ, Fort Worth, Texas  
EPA Region 6, Dallas, Texas



## Texas Commission on Environmental Quality

Title V Existing

2979

### Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	FORNEY MILL
Does the site have a physical address?	Yes
Physical Address	
Number and Street	855 E US HIGHWAY 80
City	FORNEY
State	TX
ZIP	75126
County	KAUFMAN
Latitude (N) (##.#####)	32.738888
Longitude (W) (-###.#####)	96.438055
Primary SIC Code	2631
Secondary SIC Code	
Primary NAICS Code	322130
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN100754779
What is the name of the Regulated Entity (RE)?	SMURFIT KAPPA NORTH AMERICA FORNEY MILL
Does the RE site have a physical address?	No
Because there is no physical address, describe how to locate this site:	1 MILE S OF FORNEY ON E HWY 80
City	FORNEY
State	TX
ZIP	75126
County	KAUFMAN
Latitude (N) (##.#####)	32.738888
Longitude (W) (-###.#####)	-96.438611
Facility NAICS Code	
What is the primary business of this entity?	PAPERBOARD MANUFACTURING

### Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN603424292
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Smurfit Kappa North America LLC
Texas SOS Filing Number	801046188
Federal Tax ID	800227704
State Franchise Tax ID	18002277046
State Sales Tax ID	

Local Tax ID	
DUNS Number	55760722
Number of Employees	251-500
Independently Owned and Operated?	Yes

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	SMURFIT KAPPA NORTH AMERICA LLC
Prefix	MR
First	ROBERT
Middle	
Last	BROWN
Suffix	
Credentials	
Title	VICE PRESIDENT OF MILLS

Enter new address or copy one from list:

Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 847
Routing (such as Mail Code, Dept., or Attn:)	
City	FORNEY
State	TX
ZIP	75126
Phone (###-###-####)	2145156400
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	bob.brown@smurfitkappa.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.	New Contact
Organization Name	Smurfit Kappa North America
Prefix	MISS
First	Madison
Middle	
Last	Kyle
Suffix	
Credentials	
Title	Environmental Engineer

Enter new address or copy one from list:

Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	PO BOX 847

Routing (such as Mail Code, Dept., or Attn:)

City

FORNEY

State

TX

ZIP

75126

Phone (###-###-####)

4693441514

Extension

Alternate Phone (###-###-####)

Fax (###-###-####)

E-mail

Madison.Kyle@smurfitkappa.com

Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

32 Deg 44 Min 20 Sec

3) Permit Longitude Coordinate:

96 Deg 26 Min 17 Sec

4) Is this submittal a new application or an update to an existing application?

New Application

4.1. What type of permitting action are you applying for?

Renewal

4.1.1. Are there any permits that should be voided upon issuance of this permit application through permit conversion?

No

4.1.2. Are there any permits that should be voided upon issuance of this permit application through permit consolidation?

No

5) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?

No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

[File Properties]

File Name

<a href=/ePermitsExternal/faces/file?fileId=169646>OP-1.pdf</a>

Hash

3E929DFE083EAE6E75B4D580A89D9D06CD8BFBED8500AD5112AC837DE4B4C61C

MIME-Type

application/pdf

Attach OP-2 (Application for Permit Revision/Renewal)

[File Properties]

File Name

<a href=/ePermitsExternal/faces/file?fileId=169647>OP-2.pdf</a>

Hash

33CE0427931E27ED8E8543B5BE36FB09A56B692B9E7250FFFE60C15B7C6965CB

MIME-Type

application/pdf

Attach OP-ACPS (Application Compliance Plan and Schedule)

[File Properties]

File Name

<a href=/ePermitsExternal/faces/file?fileId=169648>OP-ACPS.pdf</a>

Hash

EBA72F9FE55F3EA77951C4B670F26E8BE91E29F35029A905C7699E686D41D340

MIME-Type

application/pdf

Attach OP-REQ1 (Application Area-Wide Applicability Determinations and General Information)

## [File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=169649>OP-REQ1.pdf</a>  
Hash 2670DE7204EAFEAFF2F5E69D1DF359DD415AD192927FCEFBF25A2F6D8218ACE7  
MIME-Type application/pdf

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

## [File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=169653>OP-UA11 Tbl6 KKKK.pdf</a>  
Hash 5DF3D05B9C18352AEF7EAB1C93712ABFA9FEA94768F81AF3507F6FF01043B8E4  
MIME-Type application/pdf

## [File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=169652>OP-UA6 Tbl3 Db.pdf</a>  
Hash 6A1E55F489D59288A4F6F4C548A405F2BB539B7067B3FC839D73E9844BB435D9  
MIME-Type application/pdf

If applicable, attach OP-AR1 (Acid Rain Permit Application)

Attach OP-CRO2 (Change of Responsible Official Information)

## [File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=169654>OP\_CRO2\_OP-CR02 signed.pdf</a>  
Hash BAC95C822F55DC556D5E874D619637E1D76370A4188AAB6A501A8929C7644CA2  
MIME-Type application/pdf

Attach OP-DEL (Delegation of Responsible Official)

Attach any other necessary information needed to complete the permit.

## [File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=169656>SKNA Forney Mill TV Renewal Cover Letter.pdf</a>  
Hash 95AFD37B212C4F6E1FB0823A2AA5B01545825594DCDCE117A24EEC0153ED0CC9  
MIME-Type application/pdf

An additional space to attach any other necessary information needed to complete the permit.

Expedite Title V

1) Per Texas Health and Safety Code, Section 382.05155, does the applicant want to expedite the processing of this application?	No
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Certification

I certify that I am the Responsible Official for this application and that, based on information and belief formed after reasonable inquiry, the statements and information on this form are true, accurate, and complete.

1. I am Robert W Brown, the owner of the STEERS account ER059226.

2. I have the authority to sign this data on behalf of the applicant named above.

3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.

4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.

5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.

6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.

7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.

8. I am knowingly and intentionally signing Title V Existing 2979.

9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEQ.

OWNER OPERATOR Signature: Robert W Brown OWNER OPERATOR	
Account Number:	ER059226
Signature IP Address:	208.87.234.202
Signature Date:	2023-10-30
Signature Hash:	9CEF076DFE4256442D82EAEFD575626D29E0A144CAABFCE58260D784FF2A4E62
Form Hash Code at time of Signature:	EDA792DBEF5A7058C03E08B1CAF5C47C69C0F3D2D0DE04970A1BCEC6018ACD04

Submission

Reference Number:	The application reference number is 599921
Submitted by:	The application was submitted by ER059226/Robert W Brown
Submitted Timestamp:	The application was submitted on 2023-10-30 at 10:40:55 CDT
Submitted From:	The application was submitted from IP address 208.87.234.202
Confirmation Number:	The confirmation number is 497366
Steers Version:	The STEERS version is 6.70
Permit Number:	The permit number is 2979

Additional Information

Application Creator: This account was created by Jon R Taliaferro
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