

## Texas Commission on Environmental Quality

### Title V New

#### Site Information (Regulated Entity)

|   |  |
|---|--|
| What is the name of the permit area to be authorized?                   | GRAPHIC PACKAGING INTERNATIONAL<br>WACO MILL |
| Does the site have a physical address?                                  | Yes  |
| Physical Address  |  |
| Number and Street   | 301 SHEEHY PKWY                              |
| City  | WACO   |
| State   | TX   |
| ZIP   | 76712  |
| County  | MCLENNAN                                     |
| Latitude (N) (##.#####)   | 31.475556                                    |
| Longitude (W) (-###.#####)  | -97.191111                                   |
| Primary SIC Code  |  |
| Secondary SIC Code  |  |
| Primary NAICS Code  | 322130                                       |
| Secondary NAICS Code  |  |
| Regulated Entity Site Information                                       |  |
| What is the Regulated Entity's Number (RN)?                             | RN111634507                                  |
| What is the name of the Regulated Entity (RE)?                          | GRAPHIC PACKAGING INTERNATIONAL<br>WACO MILL |
| Does the RE site have a physical address?                               | No   |
| Because there is no physical address, describe how to locate this site: | 301 SHEESHY PARKWAY WACO TX 76712            |
| City  | WACO   |
| State   | TX   |
| ZIP   | 76712  |
| County  | MCLENNAN                                     |
| Latitude (N) (##.#####)   | 31.475556                                    |
| Longitude (W) (-###.#####)  | -97.191111                                   |
| Facility NAICS Code   | 322130                                       |
| What is the primary business of this entity?                            |  |

#### Customer (Applicant) Information

|  |                                      |
|--|--------------------------------------|
| How is this applicant associated with this site? | Owner Operator                       |
| What is the applicant's Customer Number (CN)?    | CN601710460                          |
| Type of Customer                                 | Corporation                          |
| Full legal name of the applicant:                |                                      |
| Legal Name                                       | Graphic Packaging International, LLC |
| Texas SOS Filing Number                          | 4414206                              |
| Federal Tax ID                                   | 840772929                            |
| State Franchise Tax ID                           | 18407729294                          |
| State Sales Tax ID                               |                                      |
| Local Tax ID                                     |                                      |

|                                   |           |
|-----------------------------------|-----------|
| DUNS Number                       | 840772929 |
| Number of Employees               | 501+      |
| Independently Owned and Operated? | No        |

## Responsible Official Contact

---

Person TCEQ should contact for questions about this application:

|  |  |
|--|--|
| Organization Name  | Graphic Packaging International LLC                  |
| Prefix   | SGT  |
| First  | Rich   |
| Middle   |  |
| Last   | Townley  |
| Suffix   |  |
| Credentials  |  |
| Title  | Vice President and Resident Mill Manager - Waco Mill |
| Enter new address or copy one from list:                     | Site Physical Address                                |
| Mailing Address  |  |
| Address Type   | Domestic   |
| Mailing Address (include Suite or Bldg. here, if applicable) | 301 SHEEHY PKWY                                      |
| Routing (such as Mail Code, Dept., or Attn:)                 |  |
| City   | WACO   |
| State  | TX   |
| ZIP  | 76712  |
| Phone (###-###-####)   | 5132929927   |
| Extension  |  |
| Alternate Phone (###-###-####)                               |  |
| Fax (###-###-####)   |  |
| E-mail   | rich.townley@graphicpkg.com                          |

## Technical Contact

---

Person TCEQ should contact for questions about this application:

|  |                     |
|--|---------------------|
| Same as another contact?                                     |                     |
| Organization Name  | ALL4                |
| Prefix   | MR                  |
| First  | Troy                |
| Middle   |                     |
| Last   | Gayer               |
| Suffix   |                     |
| Credentials  |                     |
| Title  | Managing Consultant |
| Enter new address or copy one from list:                     |                     |
| Mailing Address  |                     |
| Address Type   | Domestic            |
| Mailing Address (include Suite or Bldg. here, if applicable) | 9800 RICHMOND AVE   |
| Routing (such as Mail Code, Dept., or Attn:)                 |                     |

|                                |                    |
|--------------------------------|--------------------|
| City                           | HOUSTON            |
| State                          | TX                 |
| ZIP                            | 77042              |
| Phone (###-###-####)           | 9362743169         |
| Extension                      |                    |
| Alternate Phone (###-###-####) |                    |
| Fax (###-###-####)             |                    |
| E-mail                         | tgayer@all4inc.com |

## Title V General Information - New

|  |                      |
|--|----------------------|
| 1) Permit Latitude Coordinate:   | 31 Deg 28 Min 32 Sec |
| 2) Permit Longitude Coordinate:  | 97 Deg 11 Min 28 Sec |
| 3) Is this submittal a new application or an update to an existing application?                    | Update               |
| 3.1. Is this application update a follow-up to an abbreviated application?                         | No                   |
| 3.2. Select the permit/project number for which this update should be applied.                     | 4687-37159           |
| 4) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements? | N/A                  |

## Title V Attachments New

Attach OP-1 (Site Information Summary)

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-SUM (Individual Unit Summary)

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)

[File Properties]

File Name

<a href=/ePermitsExternal/faces/file?fileId=329911>OP-CRO2.pdf</a>

Hash

34D47A4B272864D555D3A77D954AA736665E54DDA1AE30DA1A03A1DCE5386085

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=329912>Email Chain for Submittal 4-22-26.pdf</a> |
| Hash      | 8667FFA862CA5FF93B0143ED508F3760E95CD14F38F353EDC1A2CF9F2C13A8E7                             |
| MIME-Type | application/pdf  |

[File Properties]

|           |  |
|-----------|--|
| File Name | <a href=/ePermitsExternal/faces/file?fileId=330204>OP-CRO1.pdf</a> |
| Hash      | 6EDBA36FE9635B10DAB4595A7BD65C907A30120762CC81521A312E79C5505060   |
| MIME-Type | application/pdf  |

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 Richard W Townley, the owner of the STEERS account ER109965.
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 New.
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: Richard W Townley OWNER OPERATOR

|                                      |  |
|--------------------------------------|--|
| Account Number:                      | ER109965   |
| Signature IP Address:                | 136.226.103.90   |
| Signature Date:                      | 2026-04-22   |
| Signature Hash:                      | 8667DED5F6C991ED88EBD5AEB112262EC27F0674263867B803D0BC773F3B1D01 |
| Form Hash Code at time of Signature: | 686F6BF3DCF4AA31033320F4C1A17B0199A846368C96B53BA2E459714D35C2C0 |

## Submission

|                      |   |
|----------------------|---|
| Reference Number:    | The application reference number is 918452                  |
| Submitted by:        | The application was submitted by ER109965/Richard W Townley |
| Submitted Timestamp: | The application was submitted on 2026-04-22 at 16:42:50 CDT |

Submitted From:

The application was submitted from IP address  
136.226.103.90

Confirmation Number:

The confirmation number is 764235

Steers Version:

The STEERS version is 6.94

## Additional Information

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Application Creator: This account was created by Troy Gayer

**Form OP-CRO1**  
**Certification by Responsible Official**  
**Federal Operating Permit Program**  
**Texas Commission on Environmental Quality**

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

|  |  |
|--|--|
| <b>I. Identifying Information</b>  |  |
| RN: <i>RN111634507</i>   |  |
| CN: <i>CN601710460</i>   |  |
| Account No.: <i>MBA012L</i>  |  |
| Permit No.: <i>04687</i>   |  |
| Project No.: <i>37159</i>  |  |
| Area Name: <i>Graphic Packaging International Waco Mill</i>  |  |
| Company Name: <i>Graphic Packaging International, LLC</i>  |  |
| <b>II. Certification Type</b> <i>(Please mark appropriate box)</i>   |  |
| <input checked="" type="checkbox"/> Responsible Official   | <input type="checkbox"/> Duly Authorized Representative          |
| <b>III. Submittal Type</b> <i>(Please mark appropriate box) (Only one response can be accepted per form)</i> |  |
| <input type="checkbox"/> SOP/TOP Initial Permit Application  | <input type="checkbox"/> Permit Revision, Renewal, or Reopening  |
| <input type="checkbox"/> GOP Initial Permit Application  | <input checked="" type="checkbox"/> Update to Permit Application |
| <input type="checkbox"/> Other: _____  |  |

**Form OP-CRO1**  
**Certification by Responsible Official**  
**Federal Operating Permit Program**  
**Texas Commission on Environmental Quality**

All initial issuance, revision, and renewal permit application submittals requiring certification must be accompanied by this form. Updates to acid rain or CSAPR (other than public notice verification materials) must be certified prior to authorization of public notice for the draft permit.

| <b>IV. Certification of Truth</b>   |  |
|---|--|
| <b>This certification does not extend to information which is designated by TCEQ as information for reference only.</b>   |  |
| I, <u>Richard William Townley</u> certify that I am the <u>RO</u>   | <u>RO</u>                                |
| <i>(Certifier Name printed or typed)</i>  | <i>(RO or DAR)</i>                       |
| and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:<br><i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i> |  |
| Time Period: From <u>10/10/2024</u> to <u>04/20/2026</u>  |  |
| <i>(Start Date)</i>   | <i>(End Date)</i>                        |
| Specific Dates: _____   |  |
| <i>(Date 1)</i>   | <i>(Date 2)</i>                          |
| <i>(Date 3)</i>   | <i>(Date 4)</i>                          |
| <i>(Date 5)</i>   | <i>(Date 6)</i>                          |
| Signature: <u><i>Richard William Townley</i></u>  | Signature Date: <u><i>04/22/2026</i></u> |
| Title: <u>Vice President and Resident Mill Manager – Waco Mill</u>  |  |

**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. 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 TCEQ.

|  |
|--|
| <b>I. Identifying Information</b>  |
| Account No.: MBA012L   |
| Regulated Entity Number: RN111634507   |
| Customer Reference Number: CN601710460   |
| Permit Number: O4687   |
| Area Name: Graphic Packaging International Waco Mill   |
| Company: Graphic Packaging International, LLC  |
| <b>II. Change Type</b>   |
| Action Type:<br><input checked="" type="checkbox"/> New Appointment<br><input type="checkbox"/> Administrative Information Change  |
| Contact Type ( <b>only one response accepted per form</b> ):<br><input checked="" type="checkbox"/> Responsible Official<br><input type="checkbox"/> Designated Representative ( <i>Acid Rain Program and/or CSAPR sources only</i> )<br><input type="checkbox"/> Alternate Designated Representative ( <i>Acid Rain Program and/or CSAPR sources only</i> ) |

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

| <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 (Driver's License/STEERS): Richard W. Townley   |
| Title: Vice President and Resident Mill Manager – Waco Mill  |
| Appointment Effective Date: 04/20/2026   |
| Telephone Number: (513) 292-9927   |
| Fax Number.:   |
| Company Name: Graphic Packaging International, LLC   |
| Mailing Address: 301 Sheehy Parkway  |
| City: Waco   |
| State: Texas   |
| ZIP Code: 76712  |
| Email Address: Rich.Townley@graphicpkg.com   |

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

**IV. Certification of Truth, Accuracy, and Completeness**

This certification does not extend to information, which is designated by TCEQ as information for reference only.

I, Richard William Townley, certify that based on information and belief formed Reasonable inquiry, the statement and information stated above are true, accurate, and complete.

Signature: Richard William Townley

Signature Date: 04/21/2026

**From:** [Emily Knodell](#)  
**To:** [Troy Gayer](#)  
**Cc:** [Chris Ward](#); [Mueller, Karl](#); [Shaikh, Furqan](#)  
**Subject:** RE: Working Draft Permit -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill  
**Date:** Thursday, April 23, 2026 10:02:41 AM  
**Attachments:** [image002.png](#)

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Great, I just received the notification from STEERS. Thanks for letting me know!

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:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>  
**Sent:** Thursday, April 23, 2026 9:41 AM  
**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Cc:** Chris Ward <[cward@all4inc.com](mailto:cward@all4inc.com)>; Mueller, Karl <[Karl.Mueller@graphicpkg.com](mailto:Karl.Mueller@graphicpkg.com)>; Shaikh, Furqan <[furqan.shaikh@graphicpkg.com](mailto:furqan.shaikh@graphicpkg.com)>  
**Subject:** Re: Working Draft Permit -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

It was submitted through STEERS yesterday along with the OP-CRO1 and email chain as supporting documentation. Apologies for not emailing it directly to you as I understood your instructions to mean it would only be accepted if submitted through STEERS. It's attached along with the OP-CRO1.

Troy

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**From:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Sent:** Thursday, April 23, 2026 9:11 AM  
**To:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>  
**Cc:** Chris Ward <[cward@all4inc.com](mailto:cward@all4inc.com)>; Mueller, Karl <[Karl.Mueller@graphicpkg.com](mailto:Karl.Mueller@graphicpkg.com)>; Shaikh, Furqan <[furqan.shaikh@graphicpkg.com](mailto:furqan.shaikh@graphicpkg.com)>  
**Subject:** RE: Working Draft Permit -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Good morning Troy,

Do you have any updates on the OP-CRO2 (item #3 of my 04/17 email)? This project is very close to mailout.

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:** Emily Knodell  
**Sent:** Wednesday, April 22, 2026 1:45 PM  
**To:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>  
**Cc:** Chris Ward <[cward@all4inc.com](mailto:cward@all4inc.com)>; Mueller, Karl <[Karl.Mueller@graphicpkg.com](mailto:Karl.Mueller@graphicpkg.com)>; Shaikh, Furqan <[furqan.shaikh@graphicpkg.com](mailto:furqan.shaikh@graphicpkg.com)>  
**Subject:** RE: Working Draft Permit -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Hi Troy,

Thank you for providing those responses. I will keep an eye out for the OP-CRO2, please send it to me no later than COB today. As requested, I have updated the deviation limit for COOLNGTWR2 (it mirrors the deviation limit of COOLINGTWR) and I have included the updated process description in the project file. See screenshot below of the update for COOLNGTWR2 from the draft.

**Periodic Monitoring Summary**

| Unit/Group/Process Information  |                                   |
|---|-----------------------------------|
| ID No.: COOLNGTWR2  |                                   |
| Control Device ID No.: N/A  | Control Device Type: N/A          |
| Applicable Regulatory Requirement   |                                   |
| Name: 30 TAC Chapter 111, Visible Emissions   | SOP Index No.: R1111-1            |
| Pollutant: Opacity  | Main Standard: § 111.111(a)(1)(C) |
| Monitoring Information  |                                   |
| Indicator: Visible emissions  |                                   |
| Minimum Frequency: Once per quarter   |                                   |
| Averaging Period: N/A   |                                   |
| Deviation Limit: The presence of visible emissions indicates a deviation unless a Method 9 Observation is completed within 24 hours to establish that opacity is below <b>15%</b> .   |                                   |
| <p>Periodic Monitoring Text: Visible emissions observations shall be made and recorded. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 miles, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor.</p> <p>If visible emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If the result of the Test Method 9 is opacity above the opacity limit in the applicable requirement, the permit holder shall report a deviation.</p> <p>Visible emissions observations shall be made quarterly. If visible emissions are observed during any quarterly observation, then visible emissions observations must be conducted weekly. If no visible emissions are observed in 12 consecutive weekly observations, then the frequency may be decreased back to quarterly.</p> |                                   |

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:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>  
**Sent:** Tuesday, April 21, 2026 5:26 PM  
**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Cc:** Chris Ward <[cward@all4inc.com](mailto:cward@all4inc.com)>; Mueller, Karl <[Karl.Mueller@graphicpkg.com](mailto:Karl.Mueller@graphicpkg.com)>; Shaikh, Furqan <[furqan.shaikh@graphicpkg.com](mailto:furqan.shaikh@graphicpkg.com)>  
**Subject:** Re: Working Draft Permit -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

GPI's responses to your questions are below. GPI will submit the OP-CRO1, OP-CRO2, and this email thread in STEERS by EOD tomorrow.

Troy

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**From:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Sent:** Friday, April 17, 2026 3:41 PM  
**To:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>  
**Cc:** Chris Ward <[cward@all4inc.com](mailto:cward@all4inc.com)>; Mueller, Karl <[Karl.Mueller@graphicpkg.com](mailto:Karl.Mueller@graphicpkg.com)>; Shaikh, Furqan <[furqan.shaikh@graphicpkg.com](mailto:furqan.shaikh@graphicpkg.com)>  
**Subject:** RE: Working Draft Permit -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Good afternoon all,

During management review, the following items were found. Please resolve by **04/22/2026**. Since we are very close to mailing this project out for Public Notice, it is imperative that we adhere to this deadline.

-

1. **Process Description:** Please confirm if the process description I have below is still correct, as this is the latest one we have for Graphic Packaging International, LLC. With the addition of new

Unit ID COOLNGTWR2, I suspect it needs to be updated. You can use the strikethrough feature in the text below if needed or just confirm if it is still up to date, then go ahead and certify the email chain via STEERS. I will then use that information in my project summary.

The Waco Mill is a recycle coated paperboard facility that takes in recycled paperboard, specifically old, corrugated containers (OCC) and internally sourced secondary fiber. In the Secondary Fiber/OCC Processing Area, incoming recycled fiber is added to three pulpers with water and mechanically broken down to produce fibers. The fibers are then screened and cleaned to remove debris and contaminants, combined with wet end additives and diluted at the headbox of the paper machine, then applied to the wire where it forms a sheet. The resultant paperboard is initially dried with steam. Steam for the paper machine is supplied by one natural gas-fired Boiler (Unit ID: BOILER1) and one natural gas-fired combustion Turbine with a Duct Burner/Heat Recovery Steam Generator (Unit ID: TURBINE). Selective catalytic reduction is utilized to reduce nitrogen oxide (NOx) emissions from both the Boiler and Turbine. The Turbine is also equipped with a Heat Recovery Steam Generator that generates power for the Mill and provides steam for the Paper Machine (Unit ID: PM01). The paper machine is equipped with six natural gas-fired dryers and one infrared dryer that removes any remaining water after dry end additives are introduced. The dryers do not meet the criteria to be listed individually in the final SOP and therefore have not been included on the Form OP-SUM or any individual unit attribute forms. The paper machine includes several atmospheric vents that release vapor from the evaporation of water from the sheet. The paper machine vents are also not listed individually on Form OP-SUM, with the exception of the Paper Machine Former Exhaust Air Fan Vent (Unit ID: PMFEASV), which is included there due to its inclusion on form OP-UA15.

Additional equipment, including several "off-permit" tanks, two calendar heaters, a four-celled cooling tower (Unit ID: COOLINGTWR), a one-celled cooling tower (Unit ID: COOLNGTWR2), a starch silo (Unit ID: STARCH), two diesel-fired fire pumps (Unit ID FIREPUMP1 and FIREPUMP2), a small wastewater pre-treatment system, and parts washers are onsite to supplement the process. The Mill has paved roadways throughout the property as well.

2. **Unit ID COOLNGTWR2:** I have added this unit to the permit and have attached a courtesy copy of the draft and summarized below where changes have occurred. I have temporarily highlighted in green where updates have been made so it is easier to see. Please review only these changes and approve the permit by the date listed above.

-Unit Summary Table (Draft Page 10). **Confirmed accurate**

-Applicable Requirements Summary (Draft Page 14). **Confirmed accurate**

-Periodic Monitoring Summary (Draft Page 24). **Please update the deviation limit to indicate that Method 9 observation needs to establish that opacity is under 15% to align with the Applicable Requirements Summary.**

- New Source Review Authorization References by Emissions Unit (Draft Page 32). **Confirmed accurate**

3. **Form OP-CRO2:** Do you have any updates on when this form will be submitted? The OP-CRO2

needs to be submitted to TCEQ through STEERS and a copy of the form must also be submitted to the appropriate TCEQ Regional Office and EPA. Also, please submit the final OP-CRO1 using the Time Period from 10/10/2024 to the date when the new person becomes the RO and upload it to STEERS

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

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:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>

**Sent:** Wednesday, April 15, 2026 6:14 PM

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

**Subject:** Re: Working Draft Permit -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Thanks Emily. It was intentionally left off of the ID. I had to remove the “I” to conform to the 10 digit limit for the OP-SUM.

Troy

On Apr 15, 2026, at 2:38 PM, Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)> wrote:

Hi Troy,

Just wanted to confirm a small typo in the ID for COOLNGTWR2. I think you meant it to be COOLINGTWR2, but it is typed as COOLNGTWR2 (missing the “I”). Please confirm. Also, I wanted to let you know that I inadvertently left off “COOLNGTWR2” from the draft permit. I will add it in and send you a courtesy copy of the draft when I have done so and inform you of any changes I made.

<image003.png>

Best Regards,

Emily L. Knodell

Permit Reviewer

TCEQ – APD – OP Section (Title V)

(512) 239-3107

<image001.jpg> How are we doing? Fill out our online  
customer satisfaction survey at  
[www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

---

**From:** Emily Knodell

**Sent:** Wednesday, March 25, 2026 9:14 AM

**To:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>

**Subject:** RE: Working Draft Permit -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Hi Troy,

You are very welcome. Yes, the OP-CRO2 needs to be submitted to TCEQ through STEERS and a copy of the form must also be submitted to the appropriate TCEQ Regional Office and EPA. Also, please submit the final OP-CRO1 using the Time Period from 10/10/2024 to the date when the new person becomes the RO and upload it to STEERS.

Best Regards,

Emily L. Knodell

Permit Reviewer

TCEQ – APD – OP Section (Title V)

(512) 239-3107

<image001.jpg> How are we doing? Fill out our online customer satisfaction survey at [www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

---

**From:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>  
**Sent:** Wednesday, March 25, 2026 8:00 AM  
**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Subject:** Re: Working Draft Permit -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Thanks for the heads up, Emily. Joe is no longer with GPI Waco, so I'll get the OP-CRO2 filled out to show that Rich is the RO. Does this also need to be certified through STEERS, or is a scanned copy acceptable?

Troy

---

**From:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Sent:** Wednesday, March 25, 2026 7:50 AM  
**To:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>  
**Subject:** RE: Working Draft Permit -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Good morning Troy,

Upon reviewing the STEERS submittal, I ran into the following issue. Please resolve by **04/01/2026**.

1. **STEERS Certification:** I noticed that this was signed by Richard W. Townley who is not the RO or DAR. We have Joseph Tomon listed as the RO in our database and there is currently no DAR designated. Only the RO or DAR can sign and submit in STEERS, please resubmit the final certification. The initial certification was signed and submitted through STEERS by Joseph Tomon, so the final certification must be signed and submitted through STEERS by Joseph unless he is no longer the RO. If this is the case, an OP-CRO2 must be sent.

<image002.png>

## Texas Commission on Environmental Quality

### Title V New

#### Site Information (Regulated Entity)

|   |  |
|---|--|
| What is the name of the permit area to be authorized?                   | GRAPHIC PACKAGING INTERNATIONAL<br>WACO MILL |
| Does the site have a physical address?                                  | Yes  |
| Physical Address  |  |
| Number and Street   | 301 SHEEHY PKWY                              |
| City  | WACO   |
| State   | TX   |
| ZIP   | 76712  |
| County  | MCLENNAN                                     |
| Latitude (N) (##.#####)   | 31.475556                                    |
| Longitude (W) (-###.#####)  | -97.191111                                   |
| Primary SIC Code  |  |
| Secondary SIC Code  |  |
| Primary NAICS Code  | 322130                                       |
| Secondary NAICS Code  |  |
| Regulated Entity Site Information                                       |  |
| What is the Regulated Entity's Number (RN)?                             | RN111634507                                  |
| What is the name of the Regulated Entity (RE)?                          | GRAPHIC PACKAGING INTERNATIONAL<br>WACO MILL |
| Does the RE site have a physical address?                               | No   |
| Because there is no physical address, describe how to locate this site: | 301 SHEESHY PARKWAY WACO TX 76712            |
| City  | WACO   |
| State   | TX   |
| ZIP   | 76712  |
| County  | MCLENNAN                                     |
| Latitude (N) (##.#####)   | 31.475556                                    |
| Longitude (W) (-###.#####)  | -97.191111                                   |
| Facility NAICS Code   | 322130                                       |
| What is the primary business of this entity?                            |  |

#### Customer (Applicant) Information

|  |                                      |
|--|--------------------------------------|
| How is this applicant associated with this site? | Owner Operator                       |
| What is the applicant's Customer Number (CN)?    | CN601710460                          |
| Type of Customer                                 | Corporation                          |
| Full legal name of the applicant:                |                                      |
| Legal Name                                       | Graphic Packaging International, LLC |
| Texas SOS Filing Number                          | 4414206                              |
| Federal Tax ID                                   | 840772929                            |
| State Franchise Tax ID                           | 18407729294                          |
| State Sales Tax ID                               |                                      |
| Local Tax ID                                     |                                      |

|                                   |           |
|-----------------------------------|-----------|
| DUNS Number                       | 840772929 |
| Number of Employees               | 501+      |
| Independently Owned and Operated? | No        |

## Responsible Official Contact

---

Person TCEQ should contact for questions about this application:

|  |                     |
|--|---------------------|
| Organization Name  | ALL4                |
| Prefix   | MR                  |
| First  | Troy                |
| Middle   |                     |
| Last   | Gayer               |
| Suffix   |                     |
| Credentials  |                     |
| Title  | Managing Consultant |
| Enter new address or copy one from list:                     |                     |
| Mailing Address  |                     |
| Address Type   | Domestic            |
| Mailing Address (include Suite or Bldg. here, if applicable) | 9800 RICHMOND AVE   |
| Routing (such as Mail Code, Dept., or Attn:)                 |                     |
| City   | HOUSTON             |
| State  | TX                  |
| ZIP  | 77042               |
| Phone (###-###-####)   | 9362743169          |
| Extension  |                     |
| Alternate Phone (###-###-####)                               |                     |
| Fax (###-###-####)   |                     |
| E-mail   | tgayer@all4inc.com  |

## Technical Contact

---

Person TCEQ should contact for questions about this application:

|  |                     |
|--|---------------------|
| Same as another contact?                                     |                     |
| Organization Name  | ALL4                |
| Prefix   | MR                  |
| First  | Troy                |
| Middle   |                     |
| Last   | Gayer               |
| Suffix   |                     |
| Credentials  |                     |
| Title  | Managing Consultant |
| Enter new address or copy one from list:                     |                     |
| Mailing Address  |                     |
| Address Type   | Domestic            |
| Mailing Address (include Suite or Bldg. here, if applicable) | 9800 RICHMOND AVE   |
| Routing (such as Mail Code, Dept., or Attn:)                 |                     |
| City   | HOUSTON             |

|                                |                    |
|--------------------------------|--------------------|
| State                          | TX                 |
| ZIP                            | 77042              |
| Phone (###-###-####)           | 9362743169         |
| Extension                      |                    |
| Alternate Phone (###-###-####) |                    |
| Fax (###-###-####)             |                    |
| E-mail                         | tgayer@all4inc.com |

## Title V General Information - New

|  |                      |
|--|----------------------|
| 1) Permit Latitude Coordinate:   | 31 Deg 28 Min 32 Sec |
| 2) Permit Longitude Coordinate:  | 97 Deg 11 Min 28 Sec |
| 3) Is this submittal a new application or an update to an existing application?                    | Update               |
| 3.1. Is this application update a follow-up to an abbreviated application?                         | No                   |
| 3.2. Select the permit/project number for which this update should be applied.                     | 4687-37159           |
| 4) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements? | N/A                  |

## Title V Attachments New

Attach OP-1 (Site Information Summary)

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=322116>OP-REQ1 Page 89 12-18-25.docx</a> |
| Hash      | F2EC4566FF6B8D6C9F10F0C4219E405281EF08D13F285AAC06D8B6554C3E77F3                     |
| MIME-Type | application/vnd.openxmlformats-officedocument.wordprocessingml.document              |

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

[File Properties]

|           |  |
|-----------|--|
| File Name | <a href=/ePermitsExternal/faces/file?fileId=322117>OP-REQ3 12-19-2025.docx</a> |
| Hash      | 49F6DB46C6BF0FE15DC14DC6F9D4A3B34F83FE65B0C516C9E513289400C98A93               |
| MIME-Type | application/vnd.openxmlformats-officedocument.wordprocessingml.document        |

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

[File Properties]

|           |  |
|-----------|--|
| File Name | <a href=/ePermitsExternal/faces/file?fileId=322118>OP-PBRSUP 12-18-2025.docx</a> |
| Hash      | 0B3736E56BE94D6BF2CA5EC9918F8895D31BBEC6CA40C23ABF3D9F158DC08933                 |

MIME-Type application/vnd.openxmlformats-officedocument.wordprocessingml.document

Attach OP-SUM (Individual Unit Summary)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=322119>OP-SUM 12-18-2025.docx</a>

Hash DCD0DC05B29F59EF8433223AEC39B654A5E63BE459541FC5F3BA8D9DA50A9FC8

MIME-Type application/vnd.openxmlformats-officedocument.wordprocessingml.document

Attach OP-MON (Monitoring Requirements)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=322122>OP-MON PM COOLINGTWR and PMFEASV 3-19-26.docx</a>

Hash CBA9A61A0250E77D50F12C2726667ED68FEDF944BF129A81937FF63C0CE1681D

MIME-Type application/vnd.openxmlformats-officedocument.wordprocessingml.document

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=322121>OP-MON PM COOLNGTWR2 3-19-2026.docx</a>

Hash 265E96287D622A5C40496E05E810FCA91F209D924C48B75ACD7266A2C01A178C

MIME-Type application/vnd.openxmlformats-officedocument.wordprocessingml.document

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=322120>OP-MON TURBINE.docx</a>

Hash FCD7385F7C14020E6A50E7F29AD6A01A18808309E56D2AA5543CAE95BDDBBAB5

MIME-Type application/vnd.openxmlformats-officedocument.wordprocessingml.document

Attach OP-UA (Unit Attribute) Forms

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=322123>OP-UA15 12-19-2025.docx</a>

Hash 5550E00CBA6A149E645ABC54C5DA29BD743F1AD2D92E25A20CE373CADEBFF656

MIME-Type application/vnd.openxmlformats-officedocument.wordprocessingml.document

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 any other necessary information needed to complete the permit.

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=322124>Mail - Troy Gayer - Outlook.pdf</a>

Hash FA0CF9775635A93CA64EB26B5700E748D3A960BE5D9AAD97E47E857A93237C5A

MIME-Type application/pdf

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 Richard W Townley, the owner of the STEERS account ER109965.
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 New.
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: Richard W Townley OWNER OPERATOR

|                                      |  |
|--------------------------------------|--|
| Account Number:                      | ER109965   |
| Signature IP Address:                | 170.85.100.184   |
| Signature Date:                      | 2026-03-24   |
| Signature Hash:                      | 8667DED5F6C991ED88EBD5AEB112262EC27F0674263867B803D0BC773F3B1D01 |
| Form Hash Code at time of Signature: | 9B4679118F70A27398703AC0F6584FB3F3A4F2371E3D40429012D13F18BE9886 |

## Submission

|                      |  |
|----------------------|--|
| Reference Number:    | The application reference number is 909546                   |
| Submitted by:        | The application was submitted by ER109965/Richard W Townley  |
| Submitted Timestamp: | The application was submitted on 2026-03-24 at 12:31:38 CDT  |
| Submitted From:      | The application was submitted from IP address 170.85.100.184 |
| Confirmation Number: | The confirmation number is 757031                            |
| Steers Version:      | The STEERS version is 6.94                                   |

## Additional Information

Application Creator: This account was created by Troy Gayer

**From:** [Emily Knodell](#)  
**To:** [Troy Gayer](#)  
**Subject:** RE: Working Draft Permit -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill  
**Date:** Tuesday, March 24, 2026 2:14:19 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)  
[image009.png](#)  
[image010.png](#)  
[image011.png](#)  
[image012.png](#)  
[image013.png](#)

---

Hi Troy,

I just got the STEERS submittal notification, thanks for sending!

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:** Emily Knodell  
**Sent:** Thursday, March 19, 2026 11:38 AM  
**To:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>  
**Subject:** RE: Working Draft Permit -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Hi Troy,

I would make sure you are selecting "update to existing application" then select the project number 37159 from the dropdown menu. I have attached our STEERS guidance, Pages 42, 43, 44 references how to make updates to an existing Title V application. Let me know if this helps.

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:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>  
**Sent:** Thursday, March 19, 2026 10:59 AM  
**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Subject:** RE: Working Draft Permit -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Is there any way you could help me with access to the application so I can just upload the docs? I found my access information, but when I entered it STEERS indicated that I cannot edit a submitted application. I don't see an option to get around this in STEERS.

Troy

---

**From:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Sent:** Wednesday, March 18, 2026 9:02 AM  
**To:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>; Chris Ward <[cward@all4inc.com](mailto:cward@all4inc.com)>  
**Cc:** Mueller, Karl <[Karl.Mueller@graphicpkg.com](mailto:Karl.Mueller@graphicpkg.com)>; Shaikh, Furqan <[Furqan.Shaikh@graphicpkg.com](mailto:Furqan.Shaikh@graphicpkg.com)>  
**Subject:** RE: Working Draft Permit -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Good morning Troy,

Thank you for your approval on the WDP. This project is now ready for management review. Please resolve the item below by **03/25/2026**.

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 **10/10/2024** to **03/18/2026**. 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

Case-by-case periodic monitoring proposal for units subject to 30 TAC Chapter 111 § 111.111(a)(1)(C) using method 22 and method 9 with a variable frequency documented in the periodic monitoring text.

### Periodic Monitoring Summary

| Unit/Group/Process Information  |                                   |
|---|-----------------------------------|
| ID No.: COOLINGTWR  |                                   |
| Control Device ID No.: N/A  | Control Device Type: N/A          |
| Applicable Regulatory Requirement   |                                   |
| Name: 30 TAC Chapter 111, Visible Emissions   | SOP Index No.: R1111-1            |
| Pollutant: Opacity  | Main Standard: § 111.111(a)(1)(C) |
| Monitoring Information  |                                   |
| Indicator: Visible Emissions  |                                   |
| Minimum Frequency: once per quarter   |                                   |
| Averaging Period: N/A   |                                   |
| Deviation Limit: <a href="#">The presence of visible emissions indicates a deviation unless a Method 9 Observation is completed within 24 hours to establish that opacity is below 15%.</a>   |                                   |
| <p>Periodic Monitoring Text: Visible emissions observations shall be made and recorded. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 miles, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor.</p> <p>If visible emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If the result of the Test Method 9 is opacity above the opacity limit in the applicable requirement, the permit holder shall report a deviation.</p> <p>Visible emissions observations shall be made quarterly. If visible emissions are observed during any quarterly observation, then visible emissions observations must be conducted weekly. If no visible emissions are observed in 12 consecutive weekly observations, then the frequency may be decreased back to quarterly.</p> |                                   |

Statement of Basis Text: The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations. The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures

Case-by-case periodic monitoring proposal for units subject to 30 TAC Chapter 111 § 111.111(a)(1)(C) using method 22 and method 9 with a variable frequency documented in the periodic monitoring text.

### Periodic Monitoring Summary

| Unit/Group/Process Information  |                                   |
|---|-----------------------------------|
| ID No.: PMFEASV   |                                   |
| Control Device ID No.: N/A  | Control Device Type: N/A          |
| Applicable Regulatory Requirement   |                                   |
| Name: 30 TAC Chapter 111, Visible Emissions   | SOP Index No.: R1111-1            |
| Pollutant: Opacity  | Main Standard: § 111.111(a)(1)(C) |
| Monitoring Information  |                                   |
| Indicator: Visible Emissions  |                                   |
| Minimum Frequency: once per quarter   |                                   |
| Averaging Period: N/A   |                                   |
| Deviation Limit: <a href="#">The presence of visible emissions indicates a deviation unless a Method 9 Observation is completed within 24 hours to establish that opacity is below 15%.</a>   |                                   |
| <p>Periodic Monitoring Text: Visible emissions observations shall be made and recorded. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 miles, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor.</p> <p>If visible emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If the result of the Test Method 9 is opacity above the opacity limit in the applicable requirement, the permit holder shall report a deviation.</p> <p>Visible emissions observations shall be made quarterly. If visible emissions are observed during any quarterly observation, then visible emissions observations must be conducted weekly. If no visible emissions are observed in 12 consecutive weekly observations, then the frequency may be decreased back to quarterly.</p> |                                   |

Statement of Basis Text: The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations. The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures

**From:** [Troy Gayer](#)  
**To:** [Emily Knodell](#); [Chris Ward](#)  
**Cc:** [Mueller, Karl](#); [Shaikh, Furqan](#)  
**Subject:** Re: Working Draft Permit -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill  
**Date:** Friday, March 13, 2026 11:52:25 AM  
**Attachments:** [image017.png](#)  
[image013.png](#)  
[image015.png](#)  
[image016.png](#)  
[image017.png](#)  
[image018.png](#)  
[image019.png](#)  
[image020.png](#)  
[image021.png](#)  
[image022.png](#)  
[image023.png](#)  
[image024.png](#)  
[PM\\_COOLINGTWR.docx](#)  
[PM\\_PMFEEASV.docx](#)

---

Good morning, Emily. We have reviewed the WDP and it is acceptable as-is. Please find attached the OP-MON forms you requested to formalize the changes to the opacity limits we discussed. We will not be requesting changes to the fuel monitoring requirements for the boiler, so no OP-UA6 is being provided.

Troy

---

**From:** Emily Knodell <Emily.Knodell@tceq.texas.gov>  
**Sent:** Monday, March 9, 2026 11:45 AM  
**To:** Troy Gayer <tgayer@all4inc.com>; Chris Ward <cward@all4inc.com>  
**Cc:** Mueller, Karl <karl.mueller@graphicpkg.com>; Shaikh, Furqan <furqan.shaikh@graphicpkg.com>  
**Subject:** RE: Working Draft Permit -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Good morning Troy,  
Thank you for your patience as I resolved these issues. Please see my responses to your questions below as well as a revised WDP. Please note that some items will require the submittal of a new UA form. Please review the revised draft and send the updated forms by **03/13/2026**. I have a question on the Periodic Monitoring section of the WDP. We had entered 7% as the deviation limit for units complying with 30 TAC 111.111(a)(1)(C), but that limit should be 15%. Can I resubmit OP-MON for each unit to update the limit?

I discussed this with our CAM/PM specialist, and he says that it is acceptable. I have updated the deviation limit for Unit ID COOLINGTWR and PMFEASV from 7% to 15% (Draft Pages 23 & 24).

As you mentioned, please submit updated OP-MONs which show the new deviation limit.

Here's an abbreviated list of areas in the Applicable Requirements Summary where we have noticed missing citations:

BOILER1:

- No NSPS Db NOx references. I don't believe these should have been left of and kept them in the OP-REQ3.

This was a data entry error on my end. This has been corrected, and the NOx references are now present (Draft Page 12).

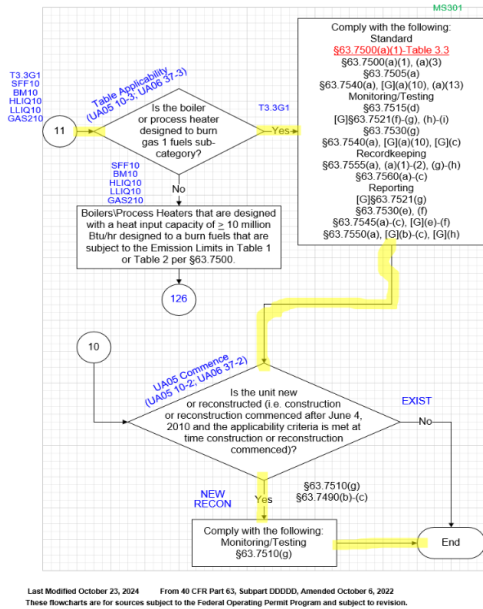
- No NSPS Db SO2 references. Is this due to the low sulfur fuel exemption? I have not removed this citation from the OP-REQ3, pending your response.

This was a data entry error on my end. This has been corrected, and the SO2 references are now present (Draft Page 13).

- Why are mercury requirements and requirements for alternative fuels listed in the table when this boiler fires only natural gas? I did not add these to the OP-REQ3.
  - Monitoring: [G]§ 63.7521(f), [G]§ 63.7521(g), § 63.7521(h), § 63.7521(i), § 63.7530(g), and [G]§ 63.7540(c)
  - Recordkeeping: § 63.7555(g)
  - Reporting: [G]§ 63.7521(g)

This has to do with the Table Applicability code you selected for BOILER1. I reviewed the flowchart path, and based on the selection of T3.3G1, those requirements will appear (see flowchart below). Please revisit the codes and revise them according to which description is correct for your scenario. Please send me the updated UA6 and I will update it on my end.

40 CFR Part 63, Subpart DDDDD  
(8 of 242)



Boiler/Steam Generator/Steam Generating Unit Attributes  
Form OP-UA6 (Page 37)  
Federal Operating Permit Program  
Table 14a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)  
Subpart DDDDD: Industrial, Commercial, and Institutional Boilers  
Texas Commission on Environmental Quality

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 03/28/2025 | TBA        | RN111634507          |

| Unit ID No. | SOP/GOP Index No. | Commence | Table Applicability | HCl Emission | HCl-CMS |
|-------------|-------------------|----------|---------------------|--------------|---------|
| BOILER1     | 63DDDD-1          | NEW      | T3.3G1              |              |         |
| HRSO        | 63DDDD-1          | NEW      | T3.1TS              |              |         |
|             |                   |          |                     |              |         |
|             |                   |          |                     |              |         |
|             |                   |          |                     |              |         |
|             |                   |          |                     |              |         |
|             |                   |          |                     |              |         |
|             |                   |          |                     |              |         |

TCEQ-10026 (AFD-ID 46v3.0, revised 09/24) OP-UA6  
This form is for use by facilities subject to air quality permit requirements

TURBINE

- No NSPS KKKK SO2 references. Is this due to the low sulfur fuel exemption? I have not removed this citation from the OP-REQ3, pending your response.
- This was an RRT error, it has been resolved and the NSPS KKKK SO2 references are now present (Draft Page 17).

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: Emily Knodell  
Sent: Friday, February 27, 2026 10:50 AM  
To: Troy Gayer <tgayer@all4inc.com>; Chris Ward <cward@all4inc.com>  
Cc: Mueller, Karl <karl.mueller@graphicpkg.com>; Shaikh, Furqan <furqan.shaikh@graphicpkg.com>  
Subject: RE: Working Draft Permit -- FOP 04687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

**Applicable Requirements Summary**  
**Form OP-REQ3**  
**(Page 2)**  
**Federal Operating Permit Program**  
**Table 1a: Additions**

|   |   |                          |
|---|---|--------------------------|
| <b>Date:</b> 12/18/2025                                   | <b>Regulated Entity No.:</b> RN111634507                    | <b>Permit No.:</b> O4687 |
| <b>Company Name:</b> Graphic Packaging International, LLC | <b>Area Name:</b> Graphic Packaging International Waco 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)   |
|--------------|---------------------------|------------------------------------|------------------|-----------------|--|---|
|              | BOILER1                   | OP-UA6                             | 63DDDD<br>D-1    | HAPS            | MACT DDDDD                             | §63.7500(a)(1)-Table 3.1<br>§63.7500(a)(1)<br>§63.7500(a)(3)<br>§63.7505(a)<br>§63.7540(a)<br>[G]§63.7540(a)(10)<br>§63.7540(a)(13) |
|              | BOILER1                   | OP-UA6                             | 60Db-1           | SO <sub>2</sub> | NSPS Db                                | §60.42b(k)(2)   |
|              | BOILER1                   | OP-UA6                             | 60Db-1           | PM              | NSPS Db                                | §60.40b(a)  |
|              | BOILER1                   | OP-UA6                             | 60Db-1           | PM(OPACITY)     | NSPS Db                                | §60.40b(a)  |
|              | BOILER1                   | OP-UA6                             | 60Db-1           | NO <sub>x</sub> | NSPS Db                                | §60.44b(l)(1)<br>§60.44b(h)<br>§60.44b(i)<br>§60.46b(a)   |

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program  
Table 1a: Additions**

|   |  |   |
|---|--|---|
| <b>Date:</b> 12/18/2025                                   | <b>Regulated Entity No.:</b> RN111634507 | <b>Permit No.:</b> O4687                                    |
| <b>Company Name:</b> Graphic Packaging International, LLC |  | <b>Area Name:</b> Graphic Packaging International Waco 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)   |
|--------------|---------------------------|------------------------------------|------------------|--------------------------|--|---|
|              | BYPASS                    | OP-UA15                            | R1111-1          | PM(OPACITY)              | Chapter 111                            | §111.111(a)(1)(C)<br>§111.111(a)(1)(E)  |
|              | COOLINGTWR                | OP-UA15                            | R1111-1          | PM(OPACITY)              | Chapter 111                            | §111.111(a)(1)(C)<br>§111.111(a)(1)(E)  |
|              | <i>COOLNGTWR2</i>         | <i>OP-UA15</i>                     | <i>R1111-1</i>   | <i>PM(OPACITY)</i>       | <i>Chapter 111</i>                     | <i>§111.111(a)(1)(C)</i><br><i>§111.111(a)(1)(E)</i>  |
|              | FIREPUMP1                 | OP-UA2                             | 60III-1          | NMHC and NO <sub>x</sub> | NSPS III                               | §60.4205(c)-Table 4<br>§60.4206<br>§60.4207(b)<br>[G]§60.4211(a)<br>§60.4211(c)<br>[G]§60.4211(f) |
|              | FIREPUMP1                 | OP-UA2                             | 60III-1          | PM                       | NSPS III                               | §60.4205(c)-Table 4<br>§60.4206<br>§60.4207(b)<br>[G]§60.4211(a)<br>§60.4211(c)<br>[G]§60.4211(f) |

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program  
Table 1a: Additions**

|  |  |   |
|--|--|---|
| <b>Date:</b> 12/18/2025                                  | <b>Regulated Entity No.:</b> RN111634507 | <b>Permit No.:</b> O4687                                    |
| <b>Company Name:</b> Graphic Packaging International LLC |  | <b>Area Name:</b> Graphic Packaging International Waco 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)  |
|--------------|---------------------------|------------------------------------|------------------|--------------------------|--|--|
|              | FIREPUMP1                 | OP-UA2                             | 63ZZZZ-1         | HAPS                     | MACT ZZZZ                              | §63.6590(b)(1)<br>§63.6595(c)<br>§63.6640(f)(1)<br>§63.6640(f)(2)<br>§63.6640(f)(2)(i)<br>§63.6640(f)(3) |
|              | FIREPUMP2                 | OP-UA2                             | 60III-1          | NMHC and NO <sub>x</sub> | NSPS III                               | §60.4205(c)-Table 4<br>§60.4206<br>§60.4207(b)<br>[G]§60.4211(a)<br>§60.4211(c)<br>[G]§60.4211(f)        |
|              | FIREPUMP2                 | OP-UA2                             | 60III-1          | PM                       | NSPS III                               | §60.4205(c)-Table 4<br>§60.4206<br>§60.4207(b)<br>[G]§60.4211(a)<br>§60.4211(c)<br>[G]§60.4211(f)        |
|              | FIREPUMP2                 | OP-UA2                             | 63ZZZZ-1         | HAPS                     | MACT ZZZZ                              | §63.6590(c)  |

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program  
Table 1a: Additions**

|  |   |                          |
|--|---|--------------------------|
| <b>Date:</b> 12/18/2025                                  | <b>Regulated Entity No.:</b> RN111634507                    | <b>Permit No.:</b> O4687 |
| <b>Company Name:</b> Graphic Packaging International LLC | <b>Area Name:</b> Graphic Packaging International Waco 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)  |
|--------------|---------------------------|------------------------------------|------------------|-------------|--|--|
|              | HRSG                      | OP-UA6                             | 63DDDD<br>D-1    | HAPS        | MACT DDDDD                             | §63.7500(a)(1)-Table 3.1<br>§63.7500(a)(1)<br>§63.7500(a)(3)<br>§63.7505(a)<br>§63.7540(a)<br>[G]§63.7540(a)(10)<br>§63.7540(a)(12)<br>§63.7540(a)(13) |
|              | PMFEASV                   | OP-UA15                            | R1111-1          | PM(OPACITY) | Chapter 111                            | §111.111(a)(1)(C)<br>§111.111(a)(1)(E)   |
|              | STARCH                    | OP-UA15                            | R1151-1          | PM          | Chapter 111                            | §111.151(a)<br>§111.151(c)   |
|              | TURBINEV                  | OP-UA15                            | R1111-1          | PM(OPACITY) | Chapter 111                            | §111.111(a)(1)(C)<br>§111.111(a)(1)(E)   |
|              | TURBINEV                  | OP-UA15                            | R1151-1          | PM          | Chapter 111                            | §111.151(a)<br>§111.151(c)   |

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program  
Table 1a: Additions**

|  |   |                          |
|--|---|--------------------------|
| <b>Date:</b> 12/18/2025                                  | <b>Regulated Entity No.:</b> RN111634507                    | <b>Permit No.:</b> O4687 |
| <b>Company Name:</b> Graphic Packaging International LLC | <b>Area Name:</b> Graphic Packaging International Waco 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)  |
|--------------|---------------------------|------------------------------------|------------------|-----------------|--|--|
|              | TURBINE                   | OP-UA11                            | 60KKKK-<br>1     | NOX             | NSPS KKKK                              | §60.4320(a)-Table 1<br>§60.4320(a)<br>§60.4320(b)<br>§60.4325<br>§60.4333(a)<br>§60.4335(b)(1)<br>[G]§60.4345  |
|              | TURBINE                   | OP-UA11                            | 60KKKK-<br>1     | SO <sub>2</sub> | NSPS KKKK                              | §60.4330(a)(1)<br>§60.4333(a)<br>[G]§60.4385   |
|              | TURBINE                   | OP-UA11                            | 63YYYY-<br>1     | FORMALDEHYDE    | MACT YYYY                              | §63.6100<br>§63.6100-Table 1.1<br>§63.6100-Table 2.1<br>§63.6105(a)<br>§63.6105 (c)<br>§63.6130(a)<br>§63.6130(a)-Table 4<br>§63.6140(a)<br>§63.6165 |

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program  
Table 1b: Additions**

|  |  |   |
|--|--|---|
| <b>Date:</b> 12/18/2025                                  | <b>Regulated Entity No.:</b> RN111634507 | <b>Permit No.:</b> O4687                                    |
| <b>Company Name:</b> Graphic Packaging International LLC |  | <b>Area Name:</b> Graphic Packaging International Waco Mill |

| Revision No. | Unit/Group/Process ID No. | SOP/GOP Index No. | Pollutant       | Monitoring and Testing Requirements   | Recordkeeping Requirements  | Reporting Requirements  |
|--------------|---------------------------|-------------------|-----------------|---|---|---|
|              | BOILER1                   | 63DDDDD-1         | HAPS            | §63.7510(g)<br>§63.7515(d)<br>§63.7525(a)(7)<br>§63.7540(a)<br>[G]§63.7540(a)(10) | §63.7555(a)<br>§63.7555(a)(1)<br>§63.7555(a)(2)<br>§63.7555(h)<br>§63.7560(a)<br>§63.7560(b)<br>§63.7560(c) | §63.7530(e)<br>§63.7530(f)<br>§63.7545(a)<br>§63.7545(b)<br>§63.7545(c)<br>[G]§63.7545(e)<br>[G]§ 63.7545(f)<br>§63.7550(a)<br>[G]§63.7550(b)<br>[G]§63.7550(c)<br>[G]§63.7550(h) |
|              | BOILER1                   | 60Db-1            | SO <sub>2</sub> | §60.47b(f)  | §60.45b(k)<br>§60.49b(o)<br>§60.49b(r)<br>§60.49b(r)(1)   | §60.49b(a)<br>§60.49b(a)(1)<br>§60.49b(r)<br>§60.49b(r)(1)  |
|              | BOILER1                   | 60Db-1            | PM              |   | [G]§60.49b(d)<br>§60.49b(o)   | §60.49b(a)<br>§60.49b(a)(1)<br>§60.49b(a)(3)  |
|              | BOILER1                   | 60Db-1            | PM(OPACITY)     |   | [G]§60.49b(d)<br>§60.49b(o)   | §60.49b(a)<br>§60.49b(a)(1)<br>§60.49b(a)(3)  |

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program  
Table 1b: Additions**

|  |   |                          |
|--|---|--------------------------|
| <b>Date:</b> 12/18/2025                                  | <b>Regulated Entity No.:</b> RN111634507                    | <b>Permit No.:</b> O4687 |
| <b>Company Name:</b> Graphic Packaging International LLC | <b>Area Name:</b> Graphic Packaging International Waco Mill |                          |

| Revision No. | Unit/Group/Process ID No. | SOP/GOP Index No. | Pollutant                | Monitoring and Testing Requirements  | Recordkeeping Requirements  | Reporting Requirements   |
|--------------|---------------------------|-------------------|--------------------------|--|---|--|
|              | BOILER1                   | 60Db-1            | NO <sub>x</sub>          | §60.46b(c)<br>§60.46b(e)<br>§60.46b(e)(1)<br>§60.46b(e)(3)<br>[G]§60.48b(b)<br>§60.48b(c)<br>§60.48b(d)<br>§60.48b(e)<br>[G]§60.48b(e)(2)<br>§60.48b(e)(3)<br>§60.48b(f) | [G]§60.48b(b)<br>§60.48b(c)<br>[G]§60.49b(d)<br>[G]§60.49b(g)<br>§60.49b(o) | §60.49b(a)<br>§60.49b(a)(1)<br>§60.49b(a)(3)<br>§60.49b(b)<br>§60.49b(h)<br>§60.49b(i)<br>§60.49b(v)<br>§60.49b(w) |
|              | BYPASS                    | R1111-1           | PM(OPACITY)              | [G]§111.111 (a)(1)(F)  |   |  |
|              | COOLINGTWR                | R1111-1           | PM(OPACITY)              | [G]§111.111 (a)(1)(F)  |   |  |
|              | <b>COOLNGTWR2</b>         | <b>R1111-1</b>    | <b>PM(OPACITY)</b>       | <b>[G]§111.111 (a)(1)(F)</b>   |   |  |
|              | FIREPUMP1                 | 60III-1           | NMHC and NO <sub>x</sub> |  |   | [G] §60.4214(d)  |
|              | FIREPUMP1                 | 60III-1           | PM                       |  |   | [G] §60.4214(d)  |
|              | FIREPUMP1                 | 63ZZZZ-1          | HAPS                     |  |   | §63.6645(f)  |

**Applicable Requirements Summary  
 Form OP-REQ3 (Page 2)  
 Federal Operating Permit Program  
 Table 1b: Additions**

|  |           |          |                          |  |  |                 |
|--|-----------|----------|--------------------------|--|--|-----------------|
|  | FIREPUMP2 | 60III-1  | NMHC and NO <sub>x</sub> |  |  | [G] §60.4214(d) |
|  | FIREPUMP2 | 60III-1  | PM                       |  |  | [G] §60.4214(d) |
|  | FIREPUMP2 | 63ZZZZ-1 | HAPS                     |  |  | §63.6645(f)     |

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program  
Table 1b: Additions**

|  |   |                          |
|--|---|--------------------------|
| <b>Date:</b> 12/18/2025                                  | <b>Regulated Entity No.:</b> RN111634507                    | <b>Permit No.:</b> O4687 |
| <b>Company Name:</b> Graphic Packaging International LLC | <b>Area Name:</b> Graphic Packaging International Waco Mill |                          |

| Revision No. | Unit/Group/Process ID No. | SOP/GOP Index No. | Pollutant   | Monitoring and Testing Requirements   | Recordkeeping Requirements   | Reporting Requirements   |
|--------------|---------------------------|-------------------|-------------|---|--|--|
|              | HRSG                      | 63DDDDD-1         | HAPS        | §63.7510(g)<br>§63.7515(d)<br>§63.7525(a)(7)<br>§63.7540(a)<br>[G]§63.7540(a)(10) | §63.7555(a)<br>§63.7555(a)(1)<br>§63.7560(a)<br>§63.7560(b)<br>§63.7560(c) | §63.7530(e)<br>§63.7530(f)<br>§63.7545(a)<br>§63.7545(b)<br>§63.7545(c)<br>[G]§63.7545(e)<br>§63.7550(a)<br>[G]§63.7550(b)<br>[G]§63.7550(c)<br>[G]§63.7550(h) |
|              | PMFEASV                   | R1111-1           | PM(OPACITY) | [G]§111.111 (a)(1)(F)   |  |  |
|              | STARCH                    | R1151-1           | PM          |   |  |  |
|              | TURBINEV                  | R1111-1           | PM(OPACITY) | [G]§111.111 (a)(1)(F)   |  |  |
|              | TURBINEV                  | R1151-1           | PM          |   |  |  |

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program  
Table 1b: Additions**

|  |   |                          |
|--|---|--------------------------|
| <b>Date:</b> 12/18/2025                                  | <b>Regulated Entity No.:</b> RN111634507                    | <b>Permit No.:</b> O4687 |
| <b>Company Name:</b> Graphic Packaging International LLC | <b>Area Name:</b> Graphic Packaging International Waco Mill |                          |

| Revision No. | Unit/Group/Process ID No. | SOP/GOP Index No. | Pollutant       | Monitoring and Testing Requirements   | Recordkeeping Requirements | Reporting Requirements  |
|--------------|---------------------------|-------------------|-----------------|---|----------------------------|---|
|              | TURBINE                   | 60KKKK-1          | NO <sub>x</sub> | [G]§60.4400(a)<br>§60.4400(b)<br>§60.4400(b)(1)<br>§60.4400(b)(2)<br>§60.4400(b)(4)<br>§60.4400(b)(5)<br>§60.4400(b)(6)<br>§60.4335(b)(1)<br>[G]§60.4345<br>§60.4350(a)<br>§60.4350(b)<br>§60.4350(d)<br>§60.4350(e)<br>§60.4350(f)<br>§60.4350(h)<br>[G]§60.4405 | [G]§60.4345<br>§60.4350(b) | [G]§60.4345<br>§60.4350(d)<br>§60.4375(a)<br>§60.4380<br>[G]§60.4380(b)<br>§60.4395 |
|              | TURBINE                   | 60KKKK-1          | SO <sub>2</sub> | §60.4415(a)<br>§60.4415(a)(1)<br>§60.4370(b)  | §60.4370(b)                |   |

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program  
Table 1b: Additions**

|  |   |                          |
|--|---|--------------------------|
| <b>Date:</b> 12/18/2025                                  | <b>Regulated Entity No.:</b> RN111634507                    | <b>Permit No.:</b> O4687 |
| <b>Company Name:</b> Graphic Packaging International LLC | <b>Area Name:</b> Graphic Packaging International Waco Mill |                          |

| Revision No. | Unit/Group/Process ID No. | SOP/GOP Index No. | Pollutant    | Monitoring and Testing Requirements  | Recordkeeping Requirements   | Reporting Requirements  |
|--------------|---------------------------|-------------------|--------------|--|--|---|
|              | TURBINE                   | 63YYYY-1          | FORMALDEHYDE | §63.6110(a)<br>§63.6115<br>§ 63.6120(a)<br>§ 63.6120(a)-Table 3.a<br>§ 63.6120(a)-Table 3.b<br>§ 63.6120(a)-Table 3.c<br>§ 63.6120(a)-Table 3.d<br>§ 63.6120(b)<br>§ 63.6120(c)<br>§ 63.6120(d)<br>§ 63.6125(a)<br>§ 63.6125(e)<br>§63.6135(a)<br>§63.6140(a)-Table 5.1<br>§63.6140(a)-Table 5.2<br>§63.6145(e)<br>§63.6145(f) | § 63.6125(e)<br>§63.6135(b)<br>§63.6155(a)<br>§63.6155(a)(1)<br>§63.6155(a)(2)<br>§63.6155(a)(5)<br>§63.6155(a)(6)<br>[G]§63.6155(a)(7)<br>§63.6155(c)<br>§63.6155(d)<br>§63.6160(a)<br>§63.6160(b)<br>§63.6160(c) | §63.6130(b)<br>§63.6140(b)<br>§63.6145(a)<br>§63.6145(b)<br>§63.6145(c)<br>§63.6145(e)<br>§63.6145(f)<br>§63.6150(a)<br>§ 63.6150(a)(1)<br>§ 63.6150(a)(2)<br>§ 63.6150(a)(3)<br>[G]§63.6150(a)(5)<br>§63.6150(a)-Table 6.1<br>§63.6150(a)-Table 6.3.1<br>§63.6150(a)-Table 6.3.2<br>§63.6150(a)-Table 6.3.3<br>[G]§63.6150(b)<br>[G]§63.6150(d)<br>[G]§63.6150(f)<br>§63.6150(g)<br>[G]§63.6150(h)<br>[G]§63.6150(i) |

**Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes  
Form OP-UA15**

**(Page 1)**

**Federal Operating Permit Program**

**Table 1a: Title 30 Texas Administrative Code Chapter 111 (30 TAC Chapter 111)**

**Subchapter A: Visible Emissions**

**Texas Commission on Environmental Quality**

| <b>Date</b> | <b>Permit No.</b> | <b>Regulated Entity No.</b> |
|-------------|-------------------|-----------------------------|
| 03/17/2026  | 04687             | RN111634507                 |

| <b>Emission Point ID No.<sup>1</sup></b> | <b>SOP/GOP Index No.</b> | <b>Alternate Opacity Limitation</b> | <b>AOL ID No.</b> | <b>Vent Source</b> | <b>Opacity Monitoring System</b> | <b>Construction Date</b> | <b>Effluent Flow Rate</b> |
|--|--------------------------|-------------------------------------|-------------------|--------------------|----------------------------------|--------------------------|---------------------------|
| BYPASS                                   | R1111-1                  | NO                                  |                   | OTHER              | NONE                             | 72+                      | 100+                      |
| COOLINGTWR                               | R1111-1                  | NO                                  |                   | <i>OTHER</i>       | NONE                             | 72+                      | 100+                      |
| <b>COOLNGTWR2</b>                        | <b>R1111-1</b>           | <b>NO</b>                           |                   | <b>OTHER</b>       | <b>NONE</b>                      | <b>72+</b>               | <b>100+</b>               |
| PMFEASV                                  | R1111-1                  | NO                                  |                   | OTHER              | NONE                             | 72+                      | 100+                      |
| TURBINEV                                 | R1111-1                  | NO                                  |                   | OTHER              | NONE                             | 72+                      | 100+                      |
|  |                          |                                     |                   |                    |                                  |                          |                           |
|  |                          |                                     |                   |                    |                                  |                          |                           |

<sup>1</sup> GPI opted to only individually list vents that are greater than 100,000 acfm. For all other process vents, periodic monitoring requirements listed in the SOP will be used to comply with the opacity standard

**Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes**  
**Form OP-UA15 (Page 2)**  
**Federal Operating Permit Program**  
**Table 1b: Title 30 Texas Administrative Code Chapter 111 (30 TAC Chapter 111)**  
**Subchapter A: Visible Emissions**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 03/17/2026 | TBA        | RN111634507          |

| Emission Point ID No. | SOP Index No. | Annual ACF | Heat Input | State Implementation Plan (SIP) Violation | Total Feed Capacity |
|-----------------------|---------------|------------|------------|---|---------------------|
| BYPASS                | R1111-1       |            |            |   |                     |
| COOLINGTWR            | R1111-1       |            |            |   |                     |
| PMFEASV               | R1111-1       |            |            |   |                     |
| TURBINE               | R1111-1       |            |            |   |                     |
|                       |               |            |            |   |                     |
|                       |               |            |            |   |                     |
|                       |               |            |            |   |                     |
|                       |               |            |            |   |                     |
|                       |               |            |            |   |                     |
|                       |               |            |            |   |                     |

**Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes**  
**Form OP-UA15 (Page 40)**  
**Federal Operating Permit Program**  
**Table 15: Title 30 Texas Administrative Code Chapter 111 (30 TAC Chapter 111)**  
**Subchapter A, Division 5: Emission Limits on Nonagricultural Processes**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 03/17/2026 | TBA        | RN111634507          |

| Emission Point ID No. | SOP Index No.  | Effective Stack Height |
|-----------------------|----------------|------------------------|
| STARCH                | R1151-1        | NO                     |
| <i>TURBINEV</i>       | <i>R1151-1</i> | <i>NO</i>              |
|                       |                |                        |
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|                       |                |                        |
|                       |                |                        |

Good morning Troy,

That answers my question, thank you! I must have overlooked that.

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



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---

**From:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>  
**Sent:** Friday, February 27, 2026 9:23 AM  
**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>; Chris Ward <[cward@all4inc.com](mailto:cward@all4inc.com)>  
**Cc:** Mueller, Karl <[karl.mueller@graphicpkg.com](mailto:karl.mueller@graphicpkg.com)>; Shaikh, Furqan <[furqan.shaikh@graphicpkg.com](mailto:furqan.shaikh@graphicpkg.com)>  
**Subject:** Re: Working Draft Permit -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Hi Emily, I just left you a voicemail and am following up with this email. Apologies for not getting back sooner, I thought I had sent this information on Wednesday and I was out of office yesterday.

I think you are referring to the missing citations for BOILER1 and TURBINE in my earlier email. Those are the unit IDs. If I'm misunderstanding your request, please elaborate and I'll get you the necessary information ASAP.

Thanks!

Troy

---

**From:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Sent:** Wednesday, February 25, 2026 7:54 AM  
**To:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>; Chris Ward <[cward@all4inc.com](mailto:cward@all4inc.com)>  
**Cc:** Mueller, Karl <[karl.mueller@graphicpkg.com](mailto:karl.mueller@graphicpkg.com)>; Shaikh, Furqan <[furqan.shaikh@graphicpkg.com](mailto:furqan.shaikh@graphicpkg.com)>  
**Subject:** RE: Working Draft Permit -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Good morning Troy,

In your comments which point out missing citations, could you please reference specific units? Thanks!

Best Regards,

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



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**From:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>  
**Sent:** Tuesday, January 6, 2026 9:55 AM  
**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>; Chris Ward <[cward@all4inc.com](mailto:cward@all4inc.com)>  
**Cc:** Mueller, Karl <[karl.mueller@graphicpkg.com](mailto:karl.mueller@graphicpkg.com)>; Shaikh, Furqan <[furqan.shaikh@graphicpkg.com](mailto:furqan.shaikh@graphicpkg.com)>  
**Subject:** Re: Working Draft Permit -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Emily,

Thank you for your response, and Happy New Year to you, as well! I appreciate your clarifications below and we are looking forward to your next response.

Troy

---

**From:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Sent:** Tuesday, January 6, 2026 9:31 AM  
**To:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>; Chris Ward <[cward@all4inc.com](mailto:cward@all4inc.com)>  
**Cc:** Mueller, Karl <[karl.mueller@graphicpkg.com](mailto:karl.mueller@graphicpkg.com)>; Shaikh, Furqan <[furqan.shaikh@graphicpkg.com](mailto:furqan.shaikh@graphicpkg.com)>  
**Subject:** RE: Working Draft Permit -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

**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.: <b>MBA012L</b>   | RN No.: <b>RN111634507</b> | CN: <b>CN601710460</b> |
| Permit No: <b>O4687</b>   | Project No.: <b>37159</b>  |                        |
| Area Name: <b>Graphic Packaging International Waco Mill</b>   |                            |                        |
| Company Name: <b>Graphic Packaging International, LLC</b>   |                            |                        |
| <b>II. Unit/Emission Point/Group/Process Information</b>  |                            |                        |
| Revision No.:   |                            |                        |
| Unit/EPN/Group/Process ID No.: <b>COOLNGTWR2</b>  |                            |                        |
| Applicable Form: <b>OP-UA15</b>   |                            |                        |
| <b>III. Applicable Regulatory Requirement</b>   |                            |                        |
| Name: <b>30 TAC Chapter 111</b>   |                            |                        |
| SOP/GOP Index No.: <b>R1111-1</b>   |                            |                        |
| Pollutant: <b>PM (OPACITY)</b>  |                            |                        |
| Main Standard: <b>§111.111(a)(1)(C)</b>   |                            |                        |
| Monitoring Type: <b>PM</b>  |                            |                        |
| Unit Size:  |                            |                        |
| Deviation Limit: <b>The presence of visible emissions indicates a deviation unless a Method 9 Observation is completed within 24 hours to establish that opacity is below 7%.</b> |                            |                        |
| <b>IV. Control Device Information</b>   |                            |                        |
| Control Device ID No.: <b>N/A</b>   |                            |                        |
| 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: <b>Visible Emissions</b>  | Minimum Frequency: <b>Once per Calendar Quarter</b> |
| Averaging Period: <b>N/A</b>   |   |
| <p>Periodic Monitoring Text:</p> <p><b>Visible emissions observations shall be made and recorded. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 miles, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor.</b></p> <p><b>If visible emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If a Test Method 9 is performed, the opacity limit is the corresponding opacity limit associated with the particulate matter standard in the underlying applicable requirement. If there is no corresponding opacity limit in the underlying applicable requirement, the maximum opacity will be established using the most recent performance test. If the result of the Test Method 9 is opacity above the corresponding opacity limit (associated with the particulate matter standard in the underlying applicable requirement or as identified as a result of a previous performance test to establish the maximum opacity limit), the permit holder shall report a deviation.</b></p> <p><b>Visible emissions observations shall be made quarterly. If visible emissions are observed during any quarterly observation, then visible emissions observations must be conducted weekly. If no visible emissions are observed in 12 consecutive weekly observations, then the frequency may be decreased back to quarterly.</b></p> |   |

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

| Date       | Permit Number | Regulated Entity Number |
|------------|---------------|-------------------------|
| 10/31/2025 | O4687         | RN111634507             |

| Unit ID No. | Registration No. | PBR No. | Registration Date |
|-------------|------------------|---------|-------------------|
| NA          | NA               | NA      | NA                |
|             |                  |         |                   |

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

| <b>Date</b>        | <b>Permit Number</b> | <b>Regulated Entity Number</b> |
|--------------------|----------------------|--------------------------------|
| 10/31/2025         | O4687                | RN111634507                    |
| <b>Unit ID No.</b> | <b>PBR No.</b>       | <b>Version No./Date</b>        |
| BIOTNK             | 106.472              | 09/04/2000                     |
| BLCHTNK            | 106.472              | 09/04/2000                     |
| BLDCOAT            | 106.473              | 09/04/2000                     |
| CAUSTNK            | 106.472              | 09/04/2000                     |
| CBSTNK             | 106.472              | 09/04/2000                     |
| CDISTNK            | 106.472              | 09/04/2000                     |
| COATTNK1           | 106.473              | 09/04/2000                     |
| COATTNK2           | 106.473              | 09/04/2000                     |
| COATTNK3           | 106.473              | 09/04/2000                     |
| COATTNK4           | 106.473              | 09/04/2000                     |
| COATTNK5           | 106.473              | 09/04/2000                     |
| COATTNK6           | 106.473              | 09/04/2000                     |
| <b>COOLNGTWR2</b>  | <b>106.371</b>       | <b>09/04/2000</b>              |
| CURCOAT            | 106.472              | 09/04/2000                     |

|            |         |            |
|------------|---------|------------|
| FIREPUMP1  | 106.511 | 09/04/2000 |
| FIREPUMP2  | 106.511 | 09/04/2000 |
| FUELTNK1   | 106.472 | 09/04/2000 |
| FUELTNK2   | 106.472 | 09/04/2000 |
| HYPOTNK    | 106.472 | 09/04/2000 |
| LXTNK1     | 106.472 | 09/04/2000 |
| LXTNK2     | 106.472 | 09/04/2000 |
| NAOHTNK    | 106.472 | 09/04/2000 |
| OCOATFTNK1 | 106.473 | 09/04/2000 |
| OCOATFTNK2 | 106.473 | 09/04/2000 |
| OCOATTNK1  | 106.473 | 09/04/2000 |
| OCOATTNK2  | 106.473 | 09/04/2000 |
| RTNTNK1    | 106.472 | 09/04/2000 |
| RTNTNK2    | 106.472 | 09/04/2000 |
| SDTNK      | 106.333 | 09/04/2000 |
| SILICATNK1 | 106.472 | 09/04/2000 |
| SILICATNK2 | 106.472 | 09/04/2000 |
| STCKTNK    | 106.472 | 09/04/2000 |
| SURFSTNK   | 106.472 | 09/04/2000 |

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

| Date       | Permit Number | Regulated Entity Number |
|------------|---------------|-------------------------|
| 10/31/2025 | O4687         | RN111634507             |

| PBR No. | Version No./Date |
|---------|------------------|
| NA      | NA               |
|         |                  |

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

| Date               |                | Permit Number                        |  | Regulated Entity Number |
|--------------------|----------------|--------------------------------------|--|-------------------------|
| 10/31/2025         |                | O4687                                |  | RN111634507             |
| Unit ID No.        | PBR No.        | Version No./Date Or Registration No. | Monitoring Requirement   |                         |
| BIOTNK             | 106.472        | 09/04/2000                           | Monthly Spectrum XD 1878 usage/purchase records for the plant.                 |                         |
| BLCHTNK            | 106.472        | 09/04/2000                           | Monthly 12.5% bleach usage/purchase records for the plant.                     |                         |
| BLDCOAT            | 106.473        | 09/04/2000                           | Monthly Bar Coating Formulation usage/purchase records for the plant.          |                         |
| CAUSTNK            | 106.472        | 09/04/2000                           | Monthly Presstige FB 9080 usage/purchase records for the plant.                |                         |
| CBSTNK             | 106.472        | 09/04/2000                           | Monthly Solenis Sectrum RX9100 usage/purchase records for the plant.           |                         |
| CDISTNK            | 106.472        | 09/04/2000                           | Monthly dispersant usage/purchase records for the plant.                       |                         |
| COATTNK1           | 106.473        | 09/04/2000                           | Monthly Bar Coating Formulation usage/purchase records for the plant.          |                         |
| COATTNK2           | 106.473        | 09/04/2000                           | Monthly Bar Coating Formulation usage/purchase records for the plant.          |                         |
| COATTNK3           | 106.473        | 09/04/2000                           | Monthly Curtain Coater Bottom Formulationusage/purchase records for the plant. |                         |
| COATTNK4           | 106.473        | 09/04/2000                           | Monthly Curtain Coater Bottom Formulationusage/purchase records for the plant. |                         |
| COATTNK5           | 106.473        | 09/04/2000                           | Monthly Curtain Coater Top Formulationusage/purchase records for the plant.    |                         |
| COATTNK6           | 106.473        | 09/04/2000                           | Monthly Curtain Coater Top Formulationusage/purchase records for the plant.    |                         |
| <i>COOLINGTWR2</i> | <i>106.371</i> | <i>09/04/2000</i>                    | <i>Monthly cooling tower volumetric flow records for the plant.</i>            |                         |
| CURCOAT            | 106.472        | 09/04/2000                           | Monthly DowRhoplex E-2961 usage/purchase records for the plant.                |                         |

|            |         |            |  |
|------------|---------|------------|--|
| FIREPUMP1  | 106.511 | 09/04/2000 | Maintain records 12-month rolling total hours of operation.    |
| FIREPUMP2  | 106.511 | 09/04/2000 | Maintain records 12-month rolling total hours of operation.    |
| FUELTNK1   | 106.472 | 09/04/2000 | Monthly Diesel usage/purchase records for the plant.           |
| FUELTNK2   | 106.472 | 09/04/2000 | Monthly Diesel usage/purchase records for the plant.           |
| HYPOTNK    | 106.472 | 09/04/2000 | Monthly 12.5% bleach usage/purchase records for the plant.     |
| LTXTNK1    | 106.472 | 09/04/2000 | Monthly Latex (Dow 3960) usage/purchase records for the plant. |
| LTXTNK2    | 106.472 | 09/04/2000 | Monthly Latex (Dow 3960) usage/purchase records for the plant. |
| NAOHTNK    | 106.472 | 09/04/2000 | Monthly NaOH usage/purchase records for the plant.             |
| OCOATFTNK1 | 106.473 | 09/04/2000 | Monthly coating usage/purchase records for the plant.          |
| OCOATFTNK2 | 106.473 | 09/04/2000 | Monthly coating usage/purchase records for the plant.          |
| OCOATTNK1  | 106.473 | 09/04/2000 | Monthly coating usage/purchase records for the plant.          |
| OCOATTNK2  | 106.473 | 09/04/2000 | Monthly coating usage/purchase records for the plant.          |
| RTNTNK1    | 106.472 | 09/04/2000 | Monthly PerForm PC8770 usage/purchase records for the plant.   |
| RTNTNK2    | 106.472 | 09/04/2000 | Monthly PerForm PC8770 usage/purchase records for the plant.   |
| SDTNK      | 106.333 | 09/04/2000 | Monthly starch usage/purchase records for the plant.           |
| SILICATNK1 | 106.472 | 09/04/2000 | Monthly PerForm MP9031 usage/purchase records for the plant.   |
| SILICATNK2 | 106.472 | 09/04/2000 | Monthly PerForm MP9031 usage/purchase records for the plant.   |
| STCKTNK    | 106.472 | 09/04/2000 | Monthly FennoSorb 8030L usage/purchase records for the plant.  |
| SURFSTNK   | 106.472 | 09/04/2000 | Monthly surfactant usage/purchase records for the plant.       |

**Application Area-Wide Applicability Determinations and General Information**  
**Form OP-REQ1 (Page 89)**  
**Federal Operating Permit Program**  
**Texas Commission on Environmental Quality**

| Date | Permit No. | Regulated Entity No. |
|------|------------|----------------------|
|      |            |                      |

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

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

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

| Authorization No. | Issuance Date | Authorization No. | Issuance Date | Authorization No. | Issuance Date |
|-------------------|---------------|-------------------|---------------|-------------------|---------------|
| 171518            | 06/04/2024    |                   |               |                   |               |
|                   |               |                   |               |                   |               |
|                   |               |                   |               |                   |               |
|                   |               |                   |               |                   |               |

- ◆ **I. Permits by Rule (30 TAC Chapter 106) for the Application Area**

*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.*

| PBR No.        | Version No./Date  | PBR No. | Version No./Date | PBR No. | Version No./Date |
|----------------|-------------------|---------|------------------|---------|------------------|
| <b>106.333</b> | <b>09/04/2000</b> |         |                  |         |                  |
| <b>106.371</b> | <b>09/04/2000</b> |         |                  |         |                  |
| <b>106.454</b> | <b>11/01/2001</b> |         |                  |         |                  |
| <b>106.472</b> | <b>09/04/2000</b> |         |                  |         |                  |
| <b>106.473</b> | <b>09/04/2000</b> |         |                  |         |                  |
| 106.511        | 09/04/2000        |         |                  |         |                  |
|                |                   |         |                  |         |                  |
|                |                   |         |                  |         |                  |

- ◆ **J. Municipal Solid Waste and Industrial Hazardous Waste Permits with an Air Addendum**

| Permit No. | Issuance Date | Permit No. | Issuance Date | Permit No. | Issuance Date |
|------------|---------------|------------|---------------|------------|---------------|
|            |               |            |               |            |               |
|            |               |            |               |            |               |
|            |               |            |               |            |               |
|            |               |            |               |            |               |

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

[Table 1](#)

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 12/16/2025 | O4687      | RN111634507          |

| Unit/Process ID No. | Applicable Form | Unit Name/Description                            | CAM | Preconstruction Authorizations<br>30 TAC Chapter 116/30 TAC<br>Chapter 106 | Preconstruction Authorizations Title I | Group ID No. |
|---------------------|-----------------|--|-----|--|--|--------------|
| BOILER1             | OP-UA6          | BOILER NO. 1                                     |     | 171518   | N/A                                    | N/A          |
| BYPASS              | OP-UA15         | TURBINE BYPASS<br>STACK                          |     | 171518   | N/A                                    | N/A          |
| COOLINGTWR          | OP-UA15         | COOLING TOWER NO.<br>1                           |     | 171518   | N/A                                    | N/A          |
| COOLNGTWR2          | OP-UA15         | COOLING TOWER NO.<br>2                           |     | 30 TAC 106.371   | N/A                                    | N/A          |
| HRSG                | OP-UA6          | HEAT RECOVERY<br>STEAM<br>GENERATING UNIT        |     | 171518   | N/A                                    | N/A          |
| FIREPUMP1           | OP-UA2          | FIRE PUMP (DIESEL)                               |     | 30 TAC 106.511   | N/A                                    | N/A          |
| FIREPUMP2           | OP-UA2          | FIRE PUMP (DIESEL)                               |     | 30 TAC 106.511   | N/A                                    | N/A          |
| PM                  | OP-REQ2         | PAPER MACHINE                                    |     | 171518   | N/A                                    | N/A          |
| PMFEASV             | OP-UA15         | PAPER MACHINE<br>FORMER EXHAUST<br>AIR FAN STACK |     | 171518   | N/A                                    | N/A          |
| STARCH              | OP-UA15         | STARCH SILO                                      | X   | 171518   | N/A                                    | N/A          |

|          |         |               |  |        |     |     |
|----------|---------|---------------|--|--------|-----|-----|
| TURBINE  | OP-UA11 | TURBINE       |  | 171518 | N/A | N/A |
| TURBINEV | OP-UA15 | TURBINE STACK |  | 171518 | N/A | N/A |

**Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes  
Form OP-UA15**

**(Page 1)**

**Federal Operating Permit Program**

**Table 1a: Title 30 Texas Administrative Code Chapter 111 (30 TAC Chapter 111)**

**Subchapter A: Visible Emissions**

**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 03/17/2026 | O4687      | RN111634507          |


| Emission Point ID No. <sup>1</sup> | SOP/GOP Index No. | Alternate Opacity Limitation | AOL ID No. | Vent Source  | Opacity Monitoring System | Construction Date | Effluent Flow Rate |
|------------------------------------|-------------------|------------------------------|------------|--------------|---------------------------|-------------------|--------------------|
| BYPASS                             | R1111-1           | NO                           |            | OTHER        | NONE                      | 72+               | 100+               |
| COOLINGTWR                         | R1111-1           | NO                           |            | OTHER        | NONE                      | 72+               | 100+               |
| <i>COOLNGTWR2</i>                  | <i>R1111-1</i>    | <i>NO</i>                    |            | <i>OTHER</i> | <i>NONE</i>               | <i>72+</i>        | <i>100+</i>        |
| PMFEASV                            | R1111-1           | NO                           |            | OTHER        | NONE                      | 72+               | 100+               |
| TURBINEV                           | R1111-1           | NO                           |            | OTHER        | NONE                      | 72+               | 100+               |
|                                    |                   |                              |            |              |                           |                   |                    |
|                                    |                   |                              |            |              |                           |                   |                    |
|                                    |                   |                              |            |              |                           |                   |                    |

<sup>1</sup> GPI opted to only individually list vents that are greater than 100,000 acfm. For all other process vents, periodic monitoring requirements listed in the SOP will be used to comply with the opacity standard

Good morning Troy,

I hope you had a Happy New Year and were able to enjoy some time off. Please find my responses to your questions below in green.

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

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**From:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>  
**Sent:** Friday, December 19, 2025 5:34 PM  
**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>; Chris Ward <[cward@all4inc.com](mailto:cward@all4inc.com)>  
**Cc:** Mueller, Karl <[karl.mueller@graphicpkg.com](mailto:karl.mueller@graphicpkg.com)>; Shaikh, Furqan <[furqan.shaikh@graphicpkg.com](mailto:furqan.shaikh@graphicpkg.com)>  
**Subject:** Re: Working Draft Permit -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Hi Emily, the OP-REQ3 and an updated OP-UA15 are attached. I am resubmitting the UA15 due to not submitting all necessary tables previously.

Thank you for sending the updates, I will look them over.

I have a question on the Periodic Monitoring section of the WDP. We had entered 7% as the deviation limit for units complying with 30 TAC 111.111(a)(1)(C), but that limit should be 15%. Can I resubmit OP-MON for each unit to update the limit?

I am running this by our CAM/PM specialist to see if the change can be made.

I did want to also ask about your comment that you can't review items that weren't addressed in a previous version of the WDP. If the requested changes can't be made while the permit is open, I would like to set up a call with you to see if there is any way we can talk through this. We do not want to have a permit issued with missing or incomplete regulatory citations. I don't have much free time until I go offline for the remainder of December. Do you have time to discuss this in January?

The comment, "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" is standard language we are required to include if it is the 2<sup>nd</sup> or later WDP submitted to the applicant for review. The idea is to give the reviewer all the comments at the same time instead of in pieces or fragments after reviewing the first draft. From there we can narrow down the comments to move the project along. If we get new comments each time (unrelated to the original issues), the project will go on and on and never reach an endpoint. This significantly prolongs our review and processing timeline, and we will begin to receive more and more pressure from our management if the project is taking too long to move to the next stage. Any additional changes requested beyond the initial comments made on the first draft are at management's discretion. I discussed the additional comments with them, and they decided that since this is an initial issuance project, it's important that we get the information correct in your permit the first time and so we will add what needs to be added.

Here's an abbreviated list of areas in the Applicable Requirements Summary where we have noticed missing citations:

BOILER1:

- No NSPS Db NOx references. I don't believe these should have been left of and kept them in the OP-REQ3.
- No NSPS Db SO2 references. Is this due to the low sulfur fuel exemption? I have not removed this citation from the OP-REQ3, pending your response.
- Why are mercury requirements and requirements for alternative fuels listed in the table when this boiler fires only natural gas? I did not add these to the OP-REQ3.
  - Monitoring: [G]§ 63.7521(f), [G]§ 63.7521(g), § 63.7521(h), § 63.7521(i), § 63.7530(g), and [G]§ 63.7540(c)
  - Recordkeeping: § 63.7555(g)
  - Reporting: [G]§ 63.7521(g)

TURBINE

- No NSPS KKKK SO2 references. Is this due to the low sulfur fuel exemption? I have not removed this citation from the OP-REQ3, pending your response.

The requirements are based on the UA data provided in the application and do not always match exactly with the OP-REQ3, oftentimes RRT and flowcharts for a regulation are under development. We do rely on the applicant to provide comments if they believe there is an error, that is when we look more closely at the OP-REQ3 form or when there are special requests being made to change citations from what is shown in the RRT. In the future, please make sure this is included with the comments you make on the first draft sent. I will look into this and get back to you.

Troy

---

**From:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Sent:** Monday, December 15, 2025 8:56 AM  
**To:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>; Chris Ward <[cward@all4inc.com](mailto:cward@all4inc.com)>  
**Cc:** Mueller, Karl <[karl.mueller@graphicpkg.com](mailto:karl.mueller@graphicpkg.com)>; Shaikh, Furqan <[furqan.shaikh@graphicpkg.com](mailto:furqan.shaikh@graphicpkg.com)>  
**Subject:** RE: Working Draft Permit -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Good morning Troy,

Thanks for letting me know about the second cooling tower. Please send me the relevant forms as you mentioned below for the new cooling tower as well as the updated OP-REQ1 (Page 89) by the 12/18 date and I will work on making those updates.

Thank you,

Emily L. Knodell

Permit Reviewer

TCEQ – APD – OP Section (Title V)

(512) 239-3107



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**From:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>  
**Sent:** Thursday, December 11, 2025 4:15 PM  
**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>; Chris Ward <[cward@all4inc.com](mailto:cward@all4inc.com)>  
**Cc:** Mueller, Karl <[karl.mueller@graphicpkg.com](mailto:karl.mueller@graphicpkg.com)>; Shaikh, Furqan <[furqan.shaikh@graphicpkg.com](mailto:furqan.shaikh@graphicpkg.com)>  
**Subject:** Re: Working Draft Permit -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Hi Emily, I tried calling and could not reach you, so I'm following up with this email.

After a brief review of the WDP, I noticed a discrepancy with the authorization mechanisms listed on the NSR References table. After initially submitting the application, the Mill learned that they needed to install a second cooling tower to comply with effluent temperature limit in their wastewater discharge permit with the City of Waco. The second cooling tower is authorized under PBR 371 (which I added to OP-PBRSUP as COOLINGTWR1) and has a flowrate greater than 100,000 ACFM, so it also needs to be added to the TVOP. The PBR authorizing COOLINGTWR1 is not associated with COOLINGTWR, which is authorized under NSR 171518, but I can see how giving the second cooling tower the Unit ID COOLINGTWR1 was confusing since the unit description for COOLINGTWR is "Cooling Tower No. 1". I will resubmit forms OP-REQ3, OP-SUM, OP-UA15, OP-PBRSUP and OP-MON to add the second cooling tower and give it Unit ID COOLINGTWR2 so it will not be confused with COOLINGTWR.

Hopefully that's a clear enough description of the situation and planned path forward, but feel free to call me for clarification at the phone number in my signature.

You can use the address below for my contact info:

9800 Richmond Ave, Suite 425

Houston, TX 77042



**Troy Gayer** / Managing Consultant

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---

**From:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Sent:** Thursday, December 11, 2025 8:47 AM  
**To:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>; Chris Ward <[cward@all4inc.com](mailto:cward@all4inc.com)>  
**Cc:** Mueller, Karl <[karl.mueller@graphicpkg.com](mailto:karl.mueller@graphicpkg.com)>; Shaikh, Furqan <[furqan.shaikh@graphicpkg.com](mailto:furqan.shaikh@graphicpkg.com)>  
**Subject:** RE: Working Draft Permit -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Good morning Troy,

I am tagging on one more item I forgot to mention in my previous email. Could you please check the information below and let me know if it is correct and fill out the highlighted field so I can add your info to my project summary? Thanks!

**Permit Consultant:**

Troy Gayer

Managing Consultant

All4

<Address>

Phone: (936) 274-3169

Email: [tgayer@all4inc.com](mailto:tgayer@all4inc.com)

Emily L. Knodell

Permit Reviewer

TCEQ – APD – OP Section (Title V)

(512) 239-3107



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---

**From:** Emily Knodell

**Sent:** Thursday, December 11, 2025 8:20 AM

**To:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>; Chris Ward <[cward@all4inc.com](mailto:cward@all4inc.com)>

**Cc:** Mueller, Karl <[karl.mueller@graphicpkg.com](mailto:karl.mueller@graphicpkg.com)>; Shaikh, Furqan <[furqan.shaikh@graphicpkg.com](mailto:furqan.shaikh@graphicpkg.com)>; Elizabeth Moorhead <[elizabeth.moorhead@tceq.texas.gov](mailto:elizabeth.moorhead@tceq.texas.gov)>

**Subject:** RE: Working Draft Permit -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Good morning Troy,

Thank you for your review sent on 11/26 as well as the updated forms.

Please review the WDP "Version 2" I have prepared and submit any comments you have by **December 18, 2025**. Please also resolve the one item listed below by this date.

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.

- Form OP-PBRSUP: I have updated the tables and included Tables A-D in the attachment. There are updates to the PBRs referenced for some of the units as we had originally indicated that all tanks were authorized under 106.472, but there are several authorized under 106.473 and one under 106.333. There have also been additional PBR authorizations claimed since the original submittal that are captured in the updated form.

Thank you for sending the updated form. I did a cross check and can confirm that all units listed on Table B appear with their PBR No, PBR Version, and monitoring correctly listed in Table D. As a side note, it looks like the only units that are in the Title V permit from this form are COOLINGTWR, FIREPUMP1, and FIREPUMP2. I added PBR 106.371/09/04/2000 for COOLINGTWR (change found on Draft Page 28 and 29). The other two were already in there. I also modified Special Term and Condition 8 so that it references the date in the most recent OP-PBRSUP you sent on 10/31. This change can be found on Draft Page 6.

- OP-MON: The requested updates were made and are included in the attached form.

These updates are reflected in the draft.

- OP-UA15: We originally indicated in footnote 2 that since the cooling tower is incapable of generating visible emissions, we were going with

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

| Date       | Permit Number | Regulated Entity Number |
|------------|---------------|-------------------------|
| 10/31/2025 | O4687         | RN111634507             |

| Unit ID No. | Registration No. | PBR No. | Registration Date |
|-------------|------------------|---------|-------------------|
| NA          | NA               | NA      | NA                |
|             |                  |         |                   |

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

| <b>Date</b>        | <b>Permit Number</b> | <b>Regulated Entity Number</b> |
|--------------------|----------------------|--------------------------------|
| 10/31/2025         | O4687                | RN111634507                    |
| <b>Unit ID No.</b> | <b>PBR No.</b>       | <b>Version No./Date</b>        |
| BIOTNK             | 106.472              | 09/04/2000                     |
| BLCHTNK            | 106.472              | 09/04/2000                     |
| BLDCOAT            | 106.473              | 09/04/2000                     |
| CAUSTNK            | 106.472              | 09/04/2000                     |
| CBSTNK             | 106.472              | 09/04/2000                     |
| CDISTNK            | 106.472              | 09/04/2000                     |
| COATTNK1           | 106.473              | 09/04/2000                     |
| COATTNK2           | 106.473              | 09/04/2000                     |
| COATTNK3           | 106.473              | 09/04/2000                     |
| COATTNK4           | 106.473              | 09/04/2000                     |
| COATTNK5           | 106.473              | 09/04/2000                     |
| COATTNK6           | 106.473              | 09/04/2000                     |
| COOLINGTWR1        | 106.371              | 09/04/2000                     |
| CURCOAT            | 106.472              | 09/04/2000                     |

|                   |         |            |
|-------------------|---------|------------|
| <b>FIREPUMP1</b>  | 106.511 | 09/04/2000 |
| <b>FIREPUMP2</b>  | 106.511 | 09/04/2000 |
| <b>FUELTK1</b>    | 106.472 | 09/04/2000 |
| <b>FUELTK2</b>    | 106.472 | 09/04/2000 |
| <b>HYPOTNK</b>    | 106.472 | 09/04/2000 |
| <b>LTXTNK1</b>    | 106.472 | 09/04/2000 |
| <b>LTXTNK2</b>    | 106.472 | 09/04/2000 |
| <b>NAOHTNK</b>    | 106.472 | 09/04/2000 |
| <b>OCOATFTNK1</b> | 106.473 | 09/04/2000 |
| <b>OCOATFTNK2</b> | 106.473 | 09/04/2000 |
| <b>OCOATTNK1</b>  | 106.473 | 09/04/2000 |
| <b>OCOATTNK2</b>  | 106.473 | 09/04/2000 |
| <b>RTNTNK1</b>    | 106.472 | 09/04/2000 |
| <b>RTNTNK2</b>    | 106.472 | 09/04/2000 |
| <b>SDTNK</b>      | 106.333 | 09/04/2000 |
| <b>SILICATNK1</b> | 106.472 | 09/04/2000 |
| <b>SILICATNK2</b> | 106.472 | 09/04/2000 |
| <b>STCKTNK</b>    | 106.472 | 09/04/2000 |
| <b>SURFSTNK</b>   | 106.472 | 09/04/2000 |

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

| Date       | Permit Number | Regulated Entity Number |
|------------|---------------|-------------------------|
| 10/31/2025 | O4687         | RN111634507             |

| PBR No. | Version No./Date |
|---------|------------------|
| NA      | NA               |
|         |                  |

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

| Date        |         | Permit Number                        |  | Regulated Entity Number |
|-------------|---------|--------------------------------------|--|-------------------------|
| 10/31/2025  |         | O4687                                |  | RN111634507             |
| Unit ID No. | PBR No. | Version No./Date Or Registration No. | Monitoring Requirement   |                         |
| BIOTNK      | 106.472 | 09/04/2000                           | Monthly Spectrum XD 1878 usage/purchase records for the plant.                 |                         |
| BLCHTNK     | 106.472 | 09/04/2000                           | Monthly 12.5% bleach usage/purchase records for the plant.                     |                         |
| BLDCOAT     | 106.473 | 09/04/2000                           | Monthly Bar Coating Formulation usage/purchase records for the plant.          |                         |
| CAUSTNK     | 106.472 | 09/04/2000                           | Monthly Presstige FB 9080 usage/purchase records for the plant.                |                         |
| CBSTNK      | 106.472 | 09/04/2000                           | Monthly Solenis Sectrum RX9100 usage/purchase records for the plant.           |                         |
| CDISTNK     | 106.472 | 09/04/2000                           | Monthly dispersant usage/purchase records for the plant.                       |                         |
| COATTNK1    | 106.473 | 09/04/2000                           | Monthly Bar Coating Formulation usage/purchase records for the plant.          |                         |
| COATTNK2    | 106.473 | 09/04/2000                           | Monthly Bar Coating Formulation usage/purchase records for the plant.          |                         |
| COATTNK3    | 106.473 | 09/04/2000                           | Monthly Curtain Coater Bottom Formulationusage/purchase records for the plant. |                         |
| COATTNK4    | 106.473 | 09/04/2000                           | Monthly Curtain Coater Bottom Formulationusage/purchase records for the plant. |                         |
| COATTNK5    | 106.473 | 09/04/2000                           | Monthly Curtain Coater Top Formulationusage/purchase records for the plant.    |                         |
| COATTNK6    | 106.473 | 09/04/2000                           | Monthly Curtain Coater Top Formulationusage/purchase records for the plant.    |                         |
| COOLINGTWR1 | 106.371 | 09/04/2000                           | Monthly cooling tower volumetric flow records for the plant.                   |                         |
| CURCOAT     | 106.472 | 09/04/2000                           | Monthly DowRhoplex E-2961 usage/purchase records for the plant.                |                         |

|                   |         |            |  |
|-------------------|---------|------------|--|
| <b>FIREPUMP1</b>  | 106.511 | 09/04/2000 | Maintain records 12-month rolling total hours of operation.    |
| <b>FIREPUMP2</b>  | 106.511 | 09/04/2000 | Maintain records 12-month rolling total hours of operation.    |
| <b>FUELTK1</b>    | 106.472 | 09/04/2000 | Monthly Diesel usage/purchase records for the plant.           |
| <b>FUELTK2</b>    | 106.472 | 09/04/2000 | Monthly Diesel usage/purchase records for the plant.           |
| <b>HYPOTNK</b>    | 106.472 | 09/04/2000 | Monthly 12.5% bleach usage/purchase records for the plant.     |
| <b>LTXTNK1</b>    | 106.472 | 09/04/2000 | Monthly Latex (Dow 3960) usage/purchase records for the plant. |
| <b>LTXTNK2</b>    | 106.472 | 09/04/2000 | Monthly Latex (Dow 3960) usage/purchase records for the plant. |
| <b>NAOHTNK</b>    | 106.472 | 09/04/2000 | Monthly NaOH usage/purchase records for the plant.             |
| <b>OCOATFTNK1</b> | 106.473 | 09/04/2000 | Monthly coating usage/purchase records for the plant.          |
| <b>OCOATFTNK2</b> | 106.473 | 09/04/2000 | Monthly coating usage/purchase records for the plant.          |
| <b>OCOATTNK1</b>  | 106.473 | 09/04/2000 | Monthly coating usage/purchase records for the plant.          |
| <b>OCOATTNK2</b>  | 106.473 | 09/04/2000 | Monthly coating usage/purchase records for the plant.          |
| <b>RTNTNK1</b>    | 106.472 | 09/04/2000 | Monthly PerForm PC8770 usage/purchase records for the plant.   |
| <b>RTNTNK2</b>    | 106.472 | 09/04/2000 | Monthly PerForm PC8770 usage/purchase records for the plant.   |
| <b>SDTNK</b>      | 106.333 | 09/04/2000 | Monthly starch usage/purchase records for the plant.           |
| <b>SILICATNK1</b> | 106.472 | 09/04/2000 | Monthly PerForm MP9031 usage/purchase records for the plant.   |
| <b>SILICATNK2</b> | 106.472 | 09/04/2000 | Monthly PerForm MP9031 usage/purchase records for the plant.   |
| <b>STCKTNK</b>    | 106.472 | 09/04/2000 | Monthly FennoSorb 8030L usage/purchase records for the plant.  |
| <b>SURFSTNK</b>   | 106.472 | 09/04/2000 | Monthly surfactant usage/purchase records for the plant.       |

"NOVIS" and requesting no periodic monitoring requirements. Are you indicating with your comment that you have considered and rejected that request?

We don't get requests for 30 TAC Ch 111 Visible Emissions very often; I checked your unit attributes (UA15) and reviewed them with our logic team. Our flowchart is built so that 1-4 Vent Source "NOVIS" is restricted to 1-7 Effluent Flow Rate which would be the "100-" code. You selected "NOVIS" and 100+. Chapter 111 (§111.111(a)(1)) lists the different vents that are controlled, and this list is mutually exclusive. Therefore, if the "Effluent Flow Rate" is greater than or equal to 100,000 acfm, as you indicated by using code "100+", the vent would need to be in compliance with the 15% opacity limit found in §111.111(a)(1)(C) and therefore subject to periodic monitoring. The only way we could use the "NOVIS" code would be if the effluent flow rate of your vent was 100- (effluent flow rate is less than 100,000 acfm). If this is not the case, I am then unable to grant this request.

1. **Form OP-REQ1 (Page 89):** Please make sure this form is up to date. For any unit specific PBRs you added, please also remember to include them on Form OP-REQ1 (Page 89). Please note that only Page 89 is needed to update this and not the entire form.

Let me know if you have any questions.

Best Regards,

Emily L. Knodell

Permit Reviewer

TCEQ – APD – OP Section (Title V)

(512) 239-3107



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**From:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>  
**Sent:** Wednesday, November 26, 2025 12:48 PM  
**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>; Chris Ward <[cward@all4inc.com](mailto:cward@all4inc.com)>  
**Cc:** Mueller, Karl <[karl.mueller@graphicpkg.com](mailto:karl.mueller@graphicpkg.com)>; Shaikh, Furqan <[furqan.shaikh@graphicpkg.com](mailto:furqan.shaikh@graphicpkg.com)>; Elizabeth Moorhead <[elizabeth.moorhead@tceq.texas.gov](mailto:elizabeth.moorhead@tceq.texas.gov)>  
**Subject:** Re: Working Draft Permit -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Hello, Emily,

We've reviewed the WDP and confirmed that the updates requested prior to the email on 9/12 were made. Thank you very much! Per your request, there were also updates made to the forms that I sent on 10/31 that have not been incorporated into the WDP, so I cannot complete a final review, and GPI cannot approve the final permit until that is done.

As an aside, when I was reviewing the OP-PBRSUP that I sent on 10/31, I noticed that I had updated PBR nos. for several tanks on Table B, but didn't make associated updates on Table D. I have attached an updated form to correct this.

Troy

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**From:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Sent:** Friday, November 21, 2025 3:50 PM  
**To:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>; Chris Ward <[cward@all4inc.com](mailto:cward@all4inc.com)>  
**Cc:** Mueller, Karl <[karl.mueller@graphicpkg.com](mailto:karl.mueller@graphicpkg.com)>; Shaikh, Furqan <[furqan.shaikh@graphicpkg.com](mailto:furqan.shaikh@graphicpkg.com)>; Elizabeth Moorhead <[elizabeth.moorhead@tceq.texas.gov](mailto:elizabeth.moorhead@tceq.texas.gov)>  
**Subject:** RE: Working Draft Permit -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Good afternoon Troy,

Thank you for sending your responses for the form updates requested in my 09/12 email. I am still missing your comments on or approval of the WDP. They were originally due on October 13, 2025. On October 10<sup>th</sup>, you requested an extension until October 24<sup>th</sup>; on October 24<sup>th</sup>, you asked for an extension until October 31<sup>st</sup>. I granted both extensions. Then on October 31<sup>st</sup>, you let me know that you had not had a chance to review the WDP and asked for another extension until November 7<sup>th</sup>. I am granting one last extension. The final deadline for submitting comments on the WDP

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

|   |                            |                        |
|---|----------------------------|------------------------|
| <b>I. Identifying Information</b>                           |                            |                        |
| Account No.: <b>MBA012L</b>                                 | RN No.: <b>RN111634507</b> | CN: <b>CN601710460</b> |
| Permit No.: <b>O4687</b>                                    | Project No.: <b>37159</b>  |                        |
| Area Name: <b>Graphic Packaging International Waco Mill</b> |                            |                        |
| Company Name: <b>Graphic Packaging International</b>        |                            |                        |
| <b>II. Unit/Emission Point/Group/Process Information</b>    |                            |                        |
| Revision No.:   |                            |                        |
| Unit/EPN/Group/Process ID No.: <b>TURBINEV</b>              |                            |                        |
| Applicable Form: <b>OP-UA15</b>                             |                            |                        |
| <b>III. Applicable Regulatory Requirement</b>               |                            |                        |
| Name: <b>30 TAC Chapter 111, Visible Emissions</b>          |                            |                        |
| SOP/GOP Index No.: <b>R1111-1</b>                           |                            |                        |
| Pollutant: <b>OPACITY</b>                                   |                            |                        |
| Main Standard: <b>§111.111(a)(1)(C)</b>                     |                            |                        |
| <b>IV. Title V Monitoring Information</b>                   |                            |                        |
| Monitoring Type: <b>PM</b>                                  |                            |                        |
| Unit Size:  |                            |                        |
| CAM/PM Option No.: <b>PM-P-030</b>                          |                            |                        |
| Deviation Limit: <b>Firing of alternate fuel</b>            |                            |                        |
| CAM/PM Option No.:  |                            |                        |
| Deviation Limit:  |                            |                        |
| <b>V. Control Device Information</b>                        |                            |                        |
| Control Device ID No.:                                      |                            |                        |
| Control Device Type:  |                            |                        |

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

|   |                            |                        |
|---|----------------------------|------------------------|
| <b>I. Identifying Information</b>                           |                            |                        |
| Account No.: <b>MBA012L</b>                                 | RN No.: <b>RN111634507</b> | CN: <b>CN601710460</b> |
| Permit No.: <b>O4687</b>                                    | Project No.: <b>37159</b>  |                        |
| Area Name: <b>Graphic Packaging International Waco Mill</b> |                            |                        |
| Company Name: <b>Graphic Packaging International</b>        |                            |                        |
| <b>II. Unit/Emission Point/Group/Process Information</b>    |                            |                        |
| Revision No.:   |                            |                        |
| Unit/EPN/Group/Process ID No.: <b>TURBINEV</b>              |                            |                        |
| Applicable Form: <b>OP-UA15</b>                             |                            |                        |
| <b>III. Applicable Regulatory Requirement</b>               |                            |                        |
| Name: <b>30 TAC Chapter 111, Nonagricultural Processes</b>  |                            |                        |
| SOP/GOP Index No.: <b>R1151-1</b>                           |                            |                        |
| Pollutant: <b>PM</b>  |                            |                        |
| Main Standard: <b>§111.151(a)</b>                           |                            |                        |
| <b>IV. Title V Monitoring Information</b>                   |                            |                        |
| Monitoring Type: <b>PM</b>                                  |                            |                        |
| Unit Size:  |                            |                        |
| CAM/PM Option No.: <b>PM-P-030</b>                          |                            |                        |
| Deviation Limit: <b>Firing of alternate fuel</b>            |                            |                        |
| CAM/PM Option No.:  |                            |                        |
| Deviation Limit:  |                            |                        |
| <b>V. Control Device Information</b>                        |                            |                        |
| Control Device ID No.:                                      |                            |                        |
| Control Device Type:  |                            |                        |

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

| Date       | Permit Number | Regulated Entity Number |
|------------|---------------|-------------------------|
| 10/31/2025 | O4687         | RN111634507             |

| Unit ID No. | Registration No. | PBR No. | Registration Date |
|-------------|------------------|---------|-------------------|
| NA          | NA               | NA      | NA                |
|             |                  |         |                   |

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

| <b>Date</b>        | <b>Permit Number</b> | <b>Regulated Entity Number</b> |
|--------------------|----------------------|--------------------------------|
| 10/31/2025         | O4687                | RN111634507                    |
| <b>Unit ID No.</b> | <b>PBR No.</b>       | <b>Version No./Date</b>        |
| BIOTNK             | 106.472              | 09/04/2000                     |
| BLCHTNK            | 106.472              | 09/04/2000                     |
| BLDCOAT            | 106.473              | 09/04/2000                     |
| CAUSTNK            | 106.472              | 09/04/2000                     |
| CBSTNK             | 106.472              | 09/04/2000                     |
| CDISTNK            | 106.472              | 09/04/2000                     |
| COATTNK1           | 106.473              | 09/04/2000                     |
| COATTNK2           | 106.473              | 09/04/2000                     |
| COATTNK3           | 106.473              | 09/04/2000                     |
| COATTNK4           | 106.473              | 09/04/2000                     |
| COATTNK5           | 106.473              | 09/04/2000                     |
| COATTNK6           | 106.473              | 09/04/2000                     |
| COOLINGTWR1        | 106.371              | 09/04/2000                     |
| CURCOAT            | 106.472              | 09/04/2000                     |

|                   |         |            |
|-------------------|---------|------------|
| <b>FIREPUMP1</b>  | 106.511 | 09/04/2000 |
| <b>FIREPUMP2</b>  | 106.511 | 09/04/2000 |
| <b>FUELTK1</b>    | 106.472 | 09/04/2000 |
| <b>FUELTK2</b>    | 106.472 | 09/04/2000 |
| <b>HYPOTNK</b>    | 106.472 | 09/04/2000 |
| <b>LTXTNK1</b>    | 106.472 | 09/04/2000 |
| <b>LTXTNK2</b>    | 106.472 | 09/04/2000 |
| <b>NAOHTNK</b>    | 106.472 | 09/04/2000 |
| <b>OCOATFTNK1</b> | 106.473 | 09/04/2000 |
| <b>OCOATFTNK2</b> | 106.473 | 09/04/2000 |
| <b>OCOATTNK1</b>  | 106.473 | 09/04/2000 |
| <b>OCOATTNK2</b>  | 106.473 | 09/04/2000 |
| <b>RTNTNK1</b>    | 106.472 | 09/04/2000 |
| <b>RTNTNK2</b>    | 106.472 | 09/04/2000 |
| <b>SDTNK</b>      | 106.333 | 09/04/2000 |
| <b>SILICATNK1</b> | 106.472 | 09/04/2000 |
| <b>SILICATNK2</b> | 106.472 | 09/04/2000 |
| <b>STCKTNK</b>    | 106.472 | 09/04/2000 |
| <b>SURFSTNK</b>   | 106.472 | 09/04/2000 |

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

| Date       | Permit Number | Regulated Entity Number |
|------------|---------------|-------------------------|
| 10/31/2025 | O4687         | RN111634507             |

| PBR No. | Version No./Date |
|---------|------------------|
| NA      | NA               |
|         |                  |

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

| Date        |         | Permit Number                        |  | Regulated Entity Number |
|-------------|---------|--------------------------------------|--|-------------------------|
| 10/31/2025  |         | O4687                                |  | RN111634507             |
| Unit ID No. | PBR No. | Version No./Date Or Registration No. | Monitoring Requirement   |                         |
| BIOTNK      | 106.472 | 09/04/2000                           | Monthly Spectrum XD 1878 usage/purchase records for the plant.                 |                         |
| BLCHTNK     | 106.472 | 09/04/2000                           | Monthly 12.5% bleach usage/purchase records for the plant.                     |                         |
| BLDCOAT     | 106.472 | 09/04/2000                           | Monthly Bar Coating Formulation usage/purchase records for the plant.          |                         |
| CAUSTNK     | 106.472 | 09/04/2000                           | Monthly Presstige FB 9080 usage/purchase records for the plant.                |                         |
| CBSTNK      | 106.472 | 09/04/2000                           | Monthly Solenis Sectrum RX9100 usage/purchase records for the plant.           |                         |
| CDISTNK     | 106.472 | 09/04/2000                           | Monthly dispersant usage/purchase records for the plant.                       |                         |
| COATTNK1    | 106.472 | 09/04/2000                           | Monthly Bar Coating Formulation usage/purchase records for the plant.          |                         |
| COATTNK2    | 106.472 | 09/04/2000                           | Monthly Bar Coating Formulation usage/purchase records for the plant.          |                         |
| COATTNK3    | 106.472 | 09/04/2000                           | Monthly Curtain Coater Bottom Formulationusage/purchase records for the plant. |                         |
| COATTNK4    | 106.472 | 09/04/2000                           | Monthly Curtain Coater Bottom Formulationusage/purchase records for the plant. |                         |
| COATTNK5    | 106.472 | 09/04/2000                           | Monthly Curtain Coater Top Formulationusage/purchase records for the plant.    |                         |
| COATTNK6    | 106.472 | 09/04/2000                           | Monthly Curtain Coater Top Formulationusage/purchase records for the plant.    |                         |

|                    |         |            |   |
|--------------------|---------|------------|---|
| <b>COOLINGTWR1</b> | 106.371 | 09/04/2000 | Monthly cooling tower volumetric flow records for the plant.    |
| <b>CURCOAT</b>     | 106.472 | 09/04/2000 | Monthly DowRhoplex E-2961 usage/purchase records for the plant. |
| <b>FUELTK1</b>     | 106.472 | 09/04/2000 | Monthly Diesel usage/purchase records for the plant.            |
| <b>FUELTK2</b>     | 106.472 | 09/04/2000 | Monthly Diesel usage/purchase records for the plant.            |
| <b>HYPOTNK</b>     | 106.472 | 09/04/2000 | Monthly 12.5% bleach usage/purchase records for the plant.      |
| <b>LTXTNK1</b>     | 106.472 | 09/04/2000 | Monthly Latex (Dow 3960) usage/purchase records for the plant.  |
| <b>LTXTNK2</b>     | 106.472 | 09/04/2000 | Monthly Latex (Dow 3960) usage/purchase records for the plant.  |
| <b>NAOHTNK</b>     | 106.472 | 09/04/2000 | Monthly NaOH usage/purchase records for the plant.              |
| <b>OCOATFTNK1</b>  | 106.473 | 09/04/2000 | Monthly coating usage/purchase records for the plant.           |
| <b>OCOATFTNK2</b>  | 106.473 | 09/04/2000 | Monthly coating usage/purchase records for the plant.           |
| <b>OCOATTNK1</b>   | 106.473 | 09/04/2000 | Monthly coating usage/purchase records for the plant.           |
| <b>OCOATTNK2</b>   | 106.473 | 09/04/2000 | Monthly coating usage/purchase records for the plant.           |
| <b>RTNTNK1</b>     | 106.472 | 09/04/2000 | Monthly PerForm PC8770 usage/purchase records for the plant.    |
| <b>RTNTNK2</b>     | 106.472 | 09/04/2000 | Monthly PerForm PC8770 usage/purchase records for the plant.    |
| <b>SDTNK</b>       | 106.333 | 09/04/2000 | Monthly starch usage/purchase records for the plant.            |
| <b>SILICATNK1</b>  | 106.472 | 09/04/2000 | Monthly PerForm MP9031 usage/purchase records for the plant.    |
| <b>SILICATNK2</b>  | 106.472 | 09/04/2000 | Monthly PerForm MP9031 usage/purchase records for the plant.    |
| <b>STCKTNK</b>     | 106.472 | 09/04/2000 | Monthly FennoSorb 8030L usage/purchase records for the plant.   |
| <b>SURFSTNK</b>    | 106.472 | 09/04/2000 | Monthly surfactant usage/purchase records for the plant.        |

will be **December 1, 2025**. My team leader let me know this is the last extension I can grant. Since it's been over two months since I sent you the WDP to review, my team leader wanted me to let you know that if you miss this deadline, we will begin the process of voiding your Title V application for unresponsiveness.

Let me know if you have any questions and I hope you have a good weekend.

Best Regards,

Emily L. Knodell

Permit Reviewer

TCEQ – APD – OP Section (Title V)

(512) 239-3107



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---

**From:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>  
**Sent:** Friday, October 31, 2025 4:11 PM  
**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>; Chris Ward <[cward@all4inc.com](mailto:cward@all4inc.com)>  
**Cc:** Mueller, Karl <[karl.mueller@graphicpkg.com](mailto:karl.mueller@graphicpkg.com)>; Shaikh, Furqan <[furqan.shaikh@graphicpkg.com](mailto:furqan.shaikh@graphicpkg.com)>  
**Subject:** Re: Working Draft Permit -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Hello Emily, and happy Halloween!

I have been working with Graphic Packaging and will submit the response to you here. Unfortunately, due to timing, we have not had the chance to review the WDP. Can we have until 11/7 to complete the review? I have addressed the form updates you have requested as noted below:

- Form OP-PBRSUP: I have updated the tables and included Tables A-D in the attachment. There are updates to the PBRs referenced for some of the units as we had originally indicated that all tanks were authorized under 106.472, but there are several authorized under 106.473 and one under 106.333. There have also been additional PBR authorizations claimed since the original submittal that are captured in the updated form.
- OP-MON: The requested updates were made and are included in the attached form.
- OP-UA15: We originally indicated in footnote 2 that since the cooling tower is incapable of generating visible emissions, we were going with "NOVIS" and requesting no periodic monitoring requirements. Are you indicating with your comment that you have considered and rejected that request?

Thank you very much for your patience with us in developing this response and with our review of the WDP!

Troy

---

**From:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Sent:** Friday, September 12, 2025 11:25 AM  
**To:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>; Chris Ward <[cward@all4inc.com](mailto:cward@all4inc.com)>  
**Cc:** Mueller, Karl <[karl.mueller@graphicpkg.com](mailto:karl.mueller@graphicpkg.com)>; Shaikh, Furqan <[furqan.shaikh@graphicpkg.com](mailto:furqan.shaikh@graphicpkg.com)>  
**Subject:** Working Draft Permit -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Good morning all,

I have conducted a technical review of *initial issuance* application for *Graphic Packaging International, LLC/Graphic Packaging International Waco 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 and resolve the items below by **October 13, 2025**.

- Form OP-REQ2:** I enhanced the permit shield's negative applicability reason text for Unit ID PM for Regulation 40 CFR Part 63, Subpart JJJJ by including the control number and the date from the attached document from EPA (this change can be seen on Draft Page 26).

Before Modification:

|  |    |         |           |          |  |
|--|----|---------|-----------|----------|--|
|  | PM | OP-REQ2 | MACT JJJJ | §63.3290 | U.S. EPA indicated that paper machines with on-machine coaters are not subject to 40 CFR Part 63, Subpart JJJJ. <sup>3</sup> |
|--|----|---------|-----------|----------|--|

After Modification:

|    |     |                              |   |
|----|-----|------------------------------|---|
| PM | N/A | 40 CFR Part 63, Subpart JJJJ | U.S. EPA indicated that paper machines with on-machine coaters are not subject to 40 CFR Part 63, Subpart JJJJ. This can be seen in the EPA applicability determinations index, control number M050007, dated 11/19/2003. |
|----|-----|------------------------------|---|

- Form OP-PBRSUP:** In the application, Tables B and D were submitted, but Tables A and C are also needed. Please re-submit the OP-PBRSUP in full, including tables A, B, C, and D as a "set" with matching dates on each table. (No table should be blank, but "none" or "NA" can be used on a table as appropriate, this allows the public to know a table was not inadvertently left out and that the site is not using any insignificant PBRs).

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

This date must match on each Table.

| Date       | Permit Number | Regulated Entry Number |
|------------|---------------|------------------------|
| 05/24/2024 | O-1070        | RN102753670            |

| Unit ID No. | Registration No. | PBR No. | Registration Date |
|-------------|------------------|---------|-------------------|
|             |                  |         |                   |

- Unit ID TURBINEV:** You provided an OP-MON for Unit ID TURBINEV for 30 TAC Chapter 111, Visible Emissions, Index R1111-1, Main Standard §111.111(a)(1)(C). The pollutant is listed as PM (Opacity). In this case, PM "particulate matter" and Opacity are subject to (2) different regulations, PM to 30 TAC Chapter 111, Nonagricultural Processes and Opacity to 30 TAC Chapter 111, Visible Emissions and therefore each need their own OP-MON. They also have different main standards. I took what you used in the OP-MON you sent and added it to the permit for both pollutants. I used the same PM Option Number for both (PM-P-030) and deviation limit, "firing of alternate fuel." Please review this in the WDP (Draft pages 23 & 24). If you agree, please send a revised OP-MON for Unit ID TURBINEV, Index No R1151-1, pollutant PM for 30 TAC Chapter 111, Nonagricultural Processes, Main Standard 111.151(a). I also made a few edits to the OP-MON (screenshot below). Please also revise the OP-MON as seen below and use it as an example for the new one.

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.: <i>RN111634507</i>    | CN: <i>CN601710460</i> |
| Permit No.: <i>TBA O4687</i>  | Project No.: <i>TBA 37159</i> |                        |
| Area Name: <i>Graphic Packaging International Waco Mill</i>   |                               |                        |
| Company Name: <i>Graphic Packaging International, LLC</i>   |                               |                        |
| <b>II. Unit/Emission Point/Group/Process Information</b>  |                               |                        |
| Revision No.:   |                               |                        |
| Unit/EPN/Group/Process ID No.: <i>TURBINE</i> <span style="color: red;">Make sure this says "TURBINEV" to match the Unit ID exactly.</span>                                       |                               |                        |
| Applicable Form: <i>OP-UA15</i>   |                               |                        |
| <b>III. Applicable Regulatory Requirement</b>   |                               |                        |
| Name: <i>30 TAC Chapter 111</i> <span style="color: red;">30 TAC Chapter 111, Visible Emissions</span>  |                               |                        |
| SOP/GOP Index No.: <i>R1111-1</i>   |                               |                        |
| Pollutant: <i>PM (OPACITY)</i> <span style="color: red;">Just list OPACITY here, the other OP-MON will be for PM.</span>  |                               |                        |
| Main Standard: <i>§111.111(a)(1)(C)</i>   |                               |                        |
| Monitoring Type: <i>PM</i>  |                               |                        |
| Deviation Limit: <i>The presence of visible emissions indicates a deviation unless a Method 9 Observation is completed within 24 hours to establish that opacity is below 7%.</i> |                               |                        |
| <b>IV. Control Device Information</b>   |                               |                        |
| Control Device ID No.: <i>N/A</i>   |                               |                        |
| <b>V. CAM Case-by-case</b>  |                               |                        |
| Indicator:  |                               |                        |
| Minimum Frequency:  |                               |                        |
| Averaging Period:   |                               |                        |
| QA/QC Procedures:   |                               |                        |
| Verification Procedures:  |                               |                        |
| Representative Date:  |                               |                        |

4. **Form OP-UA15 (Page 1):** For Unit ID COOLINGTWR, Index R1111-1, "NOVIS" is listed under the vent source column as seen below. With the combination of high flow rate and the sources listed in the NOVIS code, I suspect that the codes need to be revisited. Chapter 111 (§111.111(a)(1)) lists the different vents that are controlled, and this list is mutually exclusive. Therefore, if the "Effluent Flow Rate" is greater than or equal to 100,000 acfm, the vent would need to be in compliance with the 15% opacity limit found in §111.111(a)(1)(C). The vent source "OTHER" should be picked instead of "NOVIS". Please send a revised Form OP-UA15 (Page 1).

Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes  
Form OP-UA15  
(Page 3)  
Federal Operating Permit Program  
Table 1a: Title 30 Texas Administrative Code Chapter 111 (30 TAC Chapter 111)  
Subchapter A: Visible Emissions  
Texas Commission on Environmental Quality

| Date                               | Permit No.        | Regulated Entity No.         |            |                    |                           |                   |                    |
|------------------------------------|-------------------|------------------------------|------------|--------------------|---------------------------|-------------------|--------------------|
| 08/09/2024                         | TBA               | RN111634507                  |            |                    |                           |                   |                    |
| Emission Point ID No. <sup>1</sup> | SOP/GOP Index No. | Alternate Opacity Limitation | AOL ID No. | Vent Source        | Opacity Monitoring System | Construction Date | Effluent Flow Rate |
| BYPASS                             | R1111-1           | NO                           |            | OTHER              | NONE                      | 72+               | 100+               |
| COOLINGTWR                         | R1111-1           | NO                           |            | NOVIS <sup>2</sup> | NONE                      | 72+               | 100+               |
| PMFEASV                            | R1111-1           | NO                           |            | OTHER              | NONE                      | 72+               | 100+               |
| TURBINEV                           | R1111-1           | NO                           |            | OTHER              | NONE                      | 72+               | 100+               |
|                                    |                   |                              |            |                    |                           |                   |                    |
|                                    |                   |                              |            |                    |                           |                   |                    |

<sup>1</sup> GPI opted to only individually list vents that are greater than 100,000 acfm. For all other process vents, periodic monitoring requirements listed in the SOP will be used to comply with the opacity standard.

<sup>2</sup> The cooling tower has been added due to flow rate of emissions and presence of particulates but is not capable of generating visible emissions. Therefore, GPI requests that it be added to the permit with the acknowledgment that it will not generate visible emissions and therefore no periodic monitoring will be required.

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

|   |                            |                        |
|---|----------------------------|------------------------|
| <b>I. Identifying Information</b>                           |                            |                        |
| Account No.: <i>N/A</i>                                     | RN No.: <i>RN111634507</i> | CN: <i>CN601710460</i> |
| Permit No.: <i>O4687</i>                                    | Project No.: <i>37159</i>  |                        |
| Area Name: <i>Graphic Packaging International Waco Mill</i> |                            |                        |
| Company Name: <i>Graphic Packaging International</i>        |                            |                        |
| <b>II. Unit/Emission Point/Group/Process Information</b>    |                            |                        |
| Revision No.:   |                            |                        |
| Unit/EPN/Group/Process ID No.: <i>BYPASS</i>                |                            |                        |
| Applicable Form: <i>OP-UA15</i>                             |                            |                        |
| <b>III. Applicable Regulatory Requirement</b>               |                            |                        |
| Name: <i>30 TAC Chapter 111, Nonagricultural Processes</i>  |                            |                        |
| SOP/GOP Index No.: <i>R1111-1</i>                           |                            |                        |
| Pollutant: <i>PM (OPACITY)</i>                              |                            |                        |
| Main Standard: <i>§111.111(a)(1)(C)</i>                     |                            |                        |
| <b>IV. Title V Monitoring Information</b>                   |                            |                        |
| Monitoring Type: <i>PM</i>                                  |                            |                        |
| Unit Size:  |                            |                        |
| CAM/PM Option No.: <i>PM-P-030</i>                          |                            |                        |
| Deviation Limit: <i>Firing of alternate fuel</i>            |                            |                        |
| CAM/PM Option No.:  |                            |                        |
| Deviation Limit:  |                            |                        |
| <b>V. Control Device Information</b>                        |                            |                        |
| Control Device ID No.:                                      |                            |                        |
| Control Device Type:  |                            |                        |

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

|   |                            |                        |
|---|----------------------------|------------------------|
| <b>I. Identifying Information</b>                           |                            |                        |
| Account No.: <i>N/A</i>                                     | RN No.: <i>RN111634507</i> | CN: <i>CN601710460</i> |
| Permit No.: <i>O4687</i>                                    | Project No.: <i>37159</i>  |                        |
| Area Name: <i>Graphic Packaging International Waco Mill</i> |                            |                        |
| Company Name: <i>Graphic Packaging International</i>        |                            |                        |
| <b>II. Unit/Emission Point/Group/Process Information</b>    |                            |                        |
| Revision No.:   |                            |                        |
| Unit/EPN/Group/Process ID No.: <i>TURBINE</i>               |                            |                        |
| Applicable Form: <i>OP-UA15</i>                             |                            |                        |
| <b>III. Applicable Regulatory Requirement</b>               |                            |                        |
| Name: <i>30 TAC Chapter 111, Nonagricultural Processes</i>  |                            |                        |
| SOP/GOP Index No.: <i>R1111-1</i>                           |                            |                        |
| Pollutant: <i>PM (OPACITY)</i>                              |                            |                        |
| Main Standard: <i>§111.111(a)(1)(C)</i>                     |                            |                        |
| <b>IV. Title V Monitoring Information</b>                   |                            |                        |
| Monitoring Type: <i>PM</i>                                  |                            |                        |
| Unit Size:  |                            |                        |
| CAM/PM Option No.: <i>PM-P-030</i>                          |                            |                        |
| Deviation Limit: <i>Firing of alternate fuel</i>            |                            |                        |
| CAM/PM Option No.:  |                            |                        |
| Deviation Limit:  |                            |                        |
| <b>V. Control Device Information</b>                        |                            |                        |
| Control Device ID No.:                                      |                            |                        |
| Control Device Type:  |                            |                        |

Case-by-case periodic monitoring proposal for units subject to 30 TAC Chapter 111 § 111.111(a)(1)(C) using method 22 and method 9 with a variable frequency documented in the periodic monitoring text.

### Periodic Monitoring Summary

| Unit/Group/Process Information  |                                   |
|---|-----------------------------------|
| ID No.: COOLINGTWR  |                                   |
| Control Device ID No.: N/A  | Control Device Type: N/A          |
| Applicable Regulatory Requirement   |                                   |
| Name: 30 TAC Chapter 111, Visible Emissions   | SOP Index No.: R1111-03           |
| Pollutant: Opacity  | Main Standard: § 111.111(a)(1)(C) |
| Monitoring Information  |                                   |
| Indicator: Visible Emissions  |                                   |
| Minimum Frequency: once per quarter   |                                   |
| Averaging Period: N/A   |                                   |
| Deviation Limit: The presence of visible emissions indicates a deviation unless a Method 9 Observation is completed within 24 hours to establish that opacity is below 7%.  |                                   |
| <p>Periodic Monitoring Text: Visible emissions observations shall be made and recorded. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 miles, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor.</p> <p>If visible emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If the result of the Test Method 9 is opacity above the opacity limit in the applicable requirement, the permit holder shall report a deviation.</p> <p>Visible emissions observations shall be made quarterly. If visible emissions are observed during any quarterly observation, then visible emissions observations must be conducted weekly. If no visible emissions are observed in 12 consecutive weekly observations, then the frequency may be decreased back to quarterly.</p> |                                   |

Statement of Basis Text: The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations. The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures

Case-by-case periodic monitoring proposal for units subject to 30 TAC Chapter 111 § 111.111(a)(1)(C) using method 22 and method 9 with a variable frequency documented in the periodic monitoring text.

### Periodic Monitoring Summary

| Unit/Group/Process Information  |                                   |
|---|-----------------------------------|
| ID No.: PMFEASV   |                                   |
| Control Device ID No.: N/A  | Control Device Type: N/A          |
| Applicable Regulatory Requirement   |                                   |
| Name: 30 TAC Chapter 111, Visible Emissions   | SOP Index No.: R1111-03           |
| Pollutant: Opacity  | Main Standard: § 111.111(a)(1)(C) |
| Monitoring Information  |                                   |
| Indicator: Visible Emissions  |                                   |
| Minimum Frequency: once per quarter   |                                   |
| Averaging Period: N/A   |                                   |
| Deviation Limit: The presence of visible emissions indicates a deviation unless a Method 9 Observation is completed within 24 hours to establish that opacity is below 7%.  |                                   |
| <p>Periodic Monitoring Text: Visible emissions observations shall be made and recorded. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 miles, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor.</p> <p>If visible emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If the result of the Test Method 9 is opacity above the opacity limit in the applicable requirement, the permit holder shall report a deviation.</p> <p>Visible emissions observations shall be made quarterly. If visible emissions are observed during any quarterly observation, then visible emissions observations must be conducted weekly. If no visible emissions are observed in 12 consecutive weekly observations, then the frequency may be decreased back to quarterly.</p> |                                   |

Statement of Basis Text: The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations. The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures

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\\_factsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf). This guidance contains important information regarding WDP review and comment procedures.

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

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

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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---

**From:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>  
**Sent:** Friday, July 25, 2025 9:47 AM  
**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>; Chris Ward <[cward@all4inc.com](mailto:cward@all4inc.com)>  
**Cc:** Mueller, Karl <[karl.mueller@graphicpkg.com](mailto:karl.mueller@graphicpkg.com)>; Shaikh, Furqan <[furqan.shaikh@graphicpkg.com](mailto:furqan.shaikh@graphicpkg.com)>  
**Subject:** Re: Technical Review -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Ms. Knodell,

The responses are below, in the order they were listed in your email:

1. The phrase "2-6 inches of water column or the manufacturer's recommended operating range" was originally proposed by TCEQ in Special Condition 21 of NSR permit 171518 because equipment had not been selected during development of the NSR permit application. 2-6 inches water column was entered as the deviation limit on form OP-MON for the TVOP application to conform to this condition because GPI did not yet have the data for the equipment; however, the phrase "or the manufacturer's recommended operating range" was omitted. GPI feels that 2-6 inches of water column is sufficiently conservative but will update the OP-MON to

either add phrasing around the recommended operating range or reflect the information that was submitted with the previous response (0.5-3 inches), if needed. Please advise on this item.

2. GPI accepts the proposed language and is returning two completed Periodic Monitoring Tables for Unit IDs COOLINGTWR and PMFEASV.
3. GPI is submitting two completed OP-MON forms for Unit IDs BYPASS and TURBINE for Periodic Monitoring option PM-P-030.

Troy

---

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

**Sent:** Friday, July 18, 2025 3:24 PM

**To:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>; Chris Ward <[cward@all4inc.com](mailto:cward@all4inc.com)>

**Cc:** Mueller, Karl <[karl.mueller@graphicpkg.com](mailto:karl.mueller@graphicpkg.com)>; Shaikh, Furqan <[furqan.shaikh@graphicpkg.com](mailto:furqan.shaikh@graphicpkg.com)>

**Subject:** RE: Technical Review -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Good afternoon Troy,

Thank you for your patience, I just received the following questions from our CAM/PM specialist. Please provide answers to his questions by **07/25/2025**.

1. In regard to the deviation limit and justification provided for Unit ID STARCH for CAM Option CAM-FF-002, we still need an explanation on how you selected 2-6 inches water column for your deviation limit. You explained that the manufacturer's test results went from 0.5 to 3 inches, that the NSR permit limit (0.18 lb/hr) was determined using a higher loading than the test, so a more conservative calculation, and that compliance with the NSR limit will ensure compliance with 111.151 (under which the calculated limit is 0.93 lb/hr). However, we need you to indicate how 2-6 was your chosen deviation limit range.
2. In regard to the justification provided for the units subject 30 TAC Chapter 111 § 111.111(a)(1)(C) periodic monitoring, we agree we could do the quarterly visible emissions. However, because you only had data from a similar site, not this particular site, we have added a 3<sup>rd</sup> paragraph to the text addressing a variable frequency. I have attached a document with the proposed periodic monitoring text. Please review the proposal.
3. For the 111.111(a)(1)(C) vents from natural gas fired units (such as TURBINE), you mentioned you would like to use our suggestion of recording the fuel usage. You can either use Periodic Monitoring option PM-P-030 (annual recording) or case-by-case which is identical to the option except on a quarterly frequency. Please provide this information on Form OP-MON. You would need to identify which of the 111.111(a)(1)(C) vents fall under this category and which fall under item 2.

Please let us 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:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>

**Sent:** Wednesday, July 2, 2025 11:03 AM

**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>; Chris Ward <[cward@all4inc.com](mailto:cward@all4inc.com)>

**Cc:** Mueller, Karl <[karl.mueller@graphicpkg.com](mailto:karl.mueller@graphicpkg.com)>; Shaikh, Furqan <[furqan.shaikh@graphicpkg.com](mailto:furqan.shaikh@graphicpkg.com)>

**Subject:** Re: Technical Review -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Yes, it is. Thank you, Emily!

Troy

---

**From:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Sent:** Wednesday, July 2, 2025 10:21 AM  
**To:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>; Chris Ward <[cward@all4inc.com](mailto:cward@all4inc.com)>  
**Cc:** Mueller, Karl <[karl.mueller@graphicpkg.com](mailto:karl.mueller@graphicpkg.com)>; Shaikh, Furqan <[furqan.shaikh@graphicpkg.com](mailto:furqan.shaikh@graphicpkg.com)>  
**Subject:** RE: Technical Review -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Good morning Troy,


Thank you for your interest in moving the Title V project along. I am currently waiting for our CAM/PM specialist to review your response provided on 06/11 before I can move forward and send the first Working Draft Permit (WDP). It should also be noted that the Title V project does not need to be issued in order for the site to begin operation. As long as the Title V permit application is in house with TCEQ, the site is protected under an "application shield". NSR permits, on the other hand, are required on a pre-construction basis.

I can estimate that this project will be ready for final issuance in December. We give 30 days for the review of the first WDP sent, if you are able to review it in a shorter time, you can send the response sooner to move it along quicker. From here I would say it will be a few weeks for it to move through management review. Once the project is mailed, it takes 30 days for the Public Notice Comment Period, and 45 days for EPA Review.

I hope this information is helpful, let me know if you have additional questions.

Best Regards,

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

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---

**From:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>  
**Sent:** Tuesday, July 1, 2025 3:49 PM  
**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>; Chris Ward <[cward@all4inc.com](mailto:cward@all4inc.com)>  
**Cc:** Mueller, Karl <[karl.mueller@graphicpkg.com](mailto:karl.mueller@graphicpkg.com)>; Shaikh, Furqan <[furqan.shaikh@graphicpkg.com](mailto:furqan.shaikh@graphicpkg.com)>  
**Subject:** Re: Technical Review -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Hi Emily,

GPI Waco Mill is interested in assisting with TCEQ's review in any way needed to ensure that this permit will be issued prior to startup. Can you please let me know if there is anything else you need and provide an estimated timeline for permit issuance?

Troy

---

**From:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Sent:** Thursday, June 12, 2025 10:46 AM  
**To:** Chris Ward <[cward@all4inc.com](mailto:cward@all4inc.com)>  
**Cc:** Mueller, Karl <[karl.mueller@graphicpkg.com](mailto:karl.mueller@graphicpkg.com)>; Shaikh, Furqan <[furqan.shaikh@graphicpkg.com](mailto:furqan.shaikh@graphicpkg.com)>; Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>  
**Subject:** RE: Technical Review -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Good morning Chris,

Thank you for sending this information on behalf of Troy, I have given it to our CAM/PM specialist for his review and will get back to you if anything else is needed.


Best Regards,

Emily L. Knodell

Permit Reviewer

TCEQ – APD – OP Section (Title V)

(512) 239-3107

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---

**From:** Chris Ward <[cward@all4inc.com](mailto:cward@all4inc.com)>  
**Sent:** Wednesday, June 11, 2025 5:21 PM  
**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Cc:** Mueller, Karl <[karl.mueller@graphicpkg.com](mailto:karl.mueller@graphicpkg.com)>; Shaikh, Furqan <[furqan.shaikh@graphicpkg.com](mailto:furqan.shaikh@graphicpkg.com)>; Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>; Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>  
**Subject:** FW: Technical Review -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Emily

We wanted to take the opportunity to provide additional information regarding your first question.

The values that we converted were from the filter media test results file provided by the manufacturer WAMGroup. They show that the beginning differential pressure during the testing they conducted was 7.36 mbar (~3.0 inches of water column or w.c.) and after testing it was 1.11 mbar (~0.5 inches w.c.). The total mass emitted during the 100 cycles performed during testing on the filter media was 26.1 mg (0.0000575 lb) and the average loading was 1.24 mg/m<sup>3</sup> which is about 7.74E-8 lb/ft<sup>3</sup>.

It should be noted that we did not use this emission rate in the NSR permitting, we used industry standard grain loading of 20 gr/ft<sup>3</sup> with an industry standard control efficiency of 99.9%, which leads to controlled grain loading of 0.02 gr/ft<sup>3</sup> (2.86E-6 lb/ft<sup>3</sup> which is about 37 times higher than the rate from the testing). When we calculated the loading emissions factor for the silo, we used a maximum velocity of 1,045 ACFM through the filter to get an hourly emission rate of 0.18 lb/hr.

The proposed CAM is to comply with the standard in 30 TAC 111.151(a). The calculated allowable emission rate in 111.151(b) is 0.93 lb/hr of TSP based on the effluent flow rate, and the PTE calculations we completed for the NSR permit show an emission rate of 0.18 lb/hr, so we can assert that compliance is demonstrated by this filter media testing.

Let us know if you have any additional questions. Note that I am sending this response on Troy, Karl, and Furqan's behalf while Troy is out of office. Please continue to include Troy as the primary contact from ALL4 and copy Karl and Furqan on all correspondence.

Thanks!



**Christopher Ward, PE** / Senior Technical Manager

D: 720-894-0829 / C: 770-557-2798 / [Profile](#) / [LinkedIn](#)

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---

**From:** Mueller, Karl <[Karl.Mueller@graphicpkg.com](mailto:Karl.Mueller@graphicpkg.com)>  
**Sent:** Thursday, May 29, 2025 9:09 AM  
**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>; Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>  
**Cc:** Shaikh, Furqan <[Furqan.Shaikh@graphicpkg.com](mailto:Furqan.Shaikh@graphicpkg.com)>; John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** RE: Technical Review -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Emily:

In response to your e-mail, I am submitting this preliminary response in the interest of quickly clarifying a couple of your questions. A more formal/detailed response will follow if needed. Responses are in blue.

1. In regard to the justification provided for Unit ID STARCH for CAM Option CAM-FF-002, what was converted to get 0.5" H2O to 3" H2O? Please clarify in the documents provided what corresponds to these units/parameters. I'm not sure that I see them in the documents provided. How does this correspond to the deviation limit provided of 2 and 6 on Form OP-MON? How does that correspond to the emission limit in the rule? The correlation/justification provided should correlate what the filter is projected to emit in units of the emission limit from the rule.

GPI will review the documents previously submitted and provide an explanation for the conversion. GPI will also provide a clear justification in terms of the projected filter emissions vs. the emission limit in the rule.

2. In regard to the justification provided for the units subject 30 TAC Chapter 111 § 111.111(a)(1)(C) periodic monitoring, do you not have any visible emissions data? The data provided was for units at another site. Is it because the units are not operating yet or no monitoring is being conducted at all? If they are operating, has there been any monitoring conducted? Is there any data for the units at this site?

GPI-Waco is a new source which is under construction and not currently in operation, so there are no visible emissions (VE) data. The data submitted from GPI's Texarkana location was provided as a proxy for the type of monitoring that will take place at GPI-Waco, as well as the expected results of such monitoring, but no such monitoring is currently taking place at the Waco facility. In short, there are no VE data for the units at this site, as they have not yet been fully commissioned and placed into service.

3. For the units with natural gas combustion, we have another option in which you can monitor fuel usage and if they fire anything other than natural gas it would be considered a deviation. We could draft up a case-by-case quarterly monitoring proposal. This could also be an option in which you may satisfy periodic monitoring requirements quarterly.

GPI-Waco would prefer the compliance option restricting combustion unit operations to natural gas firing only. That is the design basis for these units, and they are unable to fire any other liquid or solid fuels as installed. A quarterly monitoring requirement would be preferred as well.

Let me know if you have any further questions.

**Karl Mueller | Sr. Environmental Manager**

Graphic Packaging International | 301 Sheehy Pkwy | Waco, TX | 76712

(Cell) 903-805-1333

[Karl.Mueller@graphicpkg.com](mailto:Karl.Mueller@graphicpkg.com) | [graphicpkg.com](http://graphicpkg.com)



---

**From:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Sent:** Thursday, May 29, 2025 8:43 AM  
**To:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>  
**Cc:** Shaikh, Furqan <[Furqan.Shaikh@graphicpkg.com](mailto:Furqan.Shaikh@graphicpkg.com)>; Mueller, Karl <[Karl.Mueller@graphicpkg.com](mailto:Karl.Mueller@graphicpkg.com)>; John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** [EXTERNAL] RE: Technical Review -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

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Good morning all,



**WAMGROUP S.p.A.**  
Via Cavour 338  
41030 Ponte Motta di Cavezzo (Modena) Italy  
Tel. +39 0535 618 111 Fax +39 0535 618 226



**FB FILTER MEDIA TEST RESULTS  
ACCORDING TO VDI 3926-1**

Certificate No.: 180824 FB Filter media VDI  
3926-1 test results  
Page 1/1

|                      |                                |
|----------------------|--------------------------------|
| <b>Quality</b>       | PE/PE 554 glaze Ex Charge CS17 |
| <b>TAN</b>           | 5230                           |
| <b>FA / Part-No.</b> | 35904W05                       |
| <b>E- / A-No.</b>    | -                              |
| <b>LA-No.</b>        | -                              |

|             | <b>area weight<br/>[g/m<sup>2</sup>]</b> | <b>air permeability<br/>@ Δp=200 Pa [l/(dm<sup>2</sup>min)]</b> |
|-------------|--|---|
| before test | 540                                      | 142   |
| after test  | 607                                      | 61  |

| <b>differential pressure [mbar]</b> | <b>before reg.</b> | <b>after reg.</b> | <b>average</b> |
|-------------------------------------|--------------------|-------------------|----------------|
| 100th cycle                         | 7,36               | 1,11              | 4,23           |

|            | <b>overall emitted mass [mg]</b> |
|------------|----------------------------------|
| 100 cycles | 26,1                             |

| <b>Emission [mg/m<sup>3</sup>]</b> | <b>total</b> | <b>PM 2.5</b> |
|------------------------------------|--------------|---------------|
| average of 100 cycles              | 1,24         | -             |

Test No.: ZG1792  
Test conditions: t-controlled, regeneration after 270s, 100 cycles (total: 450 min)  
Test dust: Lot 140512  
Raw gas concentration: 4.8 – 5.2 g/m<sup>3</sup>

Ponte Motta di Cavezzo, August 24<sup>th</sup>, 2018  
WAMGROUP S.p.A.  
Dust Collectors Division dept.

*Please note, values given may be subject to change without notice.  
Please consult WAMGROUP before using these values for design or specification.*



# FILCONTROL TIME & FILCONTROL CONNECT

*ELECTRONIC CONTROL BOARDS*

## ASSEMBLY INSTRUCTIONS



|                                  |              |                             |
|----------------------------------|--------------|-----------------------------|
| 063002705                        | Revision: A4 | Latest update: October 2022 |
| ORIGINAL INSTRUCTIONS IN ENGLISH |              |                             |

**WAMGROUP S.p.A.**  
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Cavezzo (MO) - ITALY

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All personnel involved in installation, use and maintenance operations of the equipment and of its components has to receive the suitable technical training as regards the tasks to be carried out, particularly referred to potentially explosive atmospheres areas.  
 Any modification on this equipment can void its safety requirements. Always follow the instructions provided by the manufacturer.



The apparatus is suitable for operation in ZONE 22

The zones are defined as follows.

**ZONE 0:** An area in which an explosive gas or air mixture of flammable substances atmosphere is present continuously or for long periods.

**ZONE 1:** An area in which an explosive gas or air mixture of flammable substances atmosphere is likely to occur in normal operation.

**ZONE 2:** An area in which an explosive gas or air mixture of flammable substances atmosphere is not likely to occur in normal operation and, if it occurs, will only exist for a short time.

**ZONE 20:** A place in which an explosive atmosphere in the form of a cloud of combustible dust in air is present continuously, or for long periods or frequently.

**ZONE 21:** A place in which an explosive atmosphere in the form of a cloud of combustible dust in air is likely to occur in normal operation occasionally.

**ZONE 22:** A place in which an explosive atmosphere in the form of a cloud of combustible dust in air is not likely to occur in normal operation but, if it does occur, will persist for a short period only. It is forbidden to use the apparatus in areas classified as zone 20, 21, zone 0, 1 or 2.



The apparatus is suitable to operate with granular materials (ST1, ST2 class powders) containing possibly small quantities of combustible dusts, non-conductive, with the following characteristics:

|  |    |       |
|--|----|-------|
| Minimum ignition temperature (MIT)                         | °C | > 210 |
| Minimum ignition temperature of a 5 mm layer of dust (LIT) | °C | >210  |
| Min ignition energy (MIE)<br>All operating temperatures    | mJ | ≥ 3   |

It is forbidden to use the apparatus with hybrid mixtures, explosives, chemically unstable powders.



The user must make sure the equipment is used according to the intended use, particularly in the ZONES that match those for which the equipment has been declared fit by the manufacturer. The permitted ambient temperature is:  $-20^{\circ}\text{C} \leq T_{\text{amb}} \leq 60^{\circ}\text{C}$ .



Any electrical or mechanical components to be installed on the apparatus must have certified category suitable for use:

- category 3D (Zone 22)

During maintenance or cleaning operations the user must ensure the equipment used (fans, portable lamps etc.) belong to the category suitable to the environment:

- category 3D (Zone 22)



The user shall make sure that the plant in which the apparatus is to be installed was properly set in safety conditions from an explosion risk point of view before starting it up and that the "Explosion protection document" has been written according to the Directive ATEX 1999/92/CE. 81-2008).



The installer has to make sure the process specifications match the features of the apparatus given on the plate (regarding, for instance, the maximum surface temperature).

If the features of the material are not compatible, it is forbidden to use the apparatus.



The user must never open the housing.

The installation, mounting and disassembling operations must be carried out with equipment switched off or in the absence of potentially explosive atmosphere.



It is forbidden to drill holes in the housing.

It is forbidden to modify the wiring diagram.

If no cable gland is used, it is compulsory to cover the hole with a certified stopper.



The equipment has been tested and certified by WAM to be used in ATEX environments and it is supplied with air piping and cable glands which have not been separately certified (i.e. they do not bear individually the ATEX marking, but they have been certified with the case that contains them).

**IT IS FORBIDDEN TO MODIFY THE CABLES, CABLE GLANDS, PIPING AND CONNECTIONS.**



### INSTALLATION - START UP

Prior to the installation and start-up check to make sure the supply has not suffered damages during shipping.

The tools used for the installation must be compliant to EN 1127-1 depending on the zone of use.

The electrical connections must be performed by qualified personnel and in accordance with the indications given on the wiring diagram.

The equipment must not be installed in a position which may subject it to electrostatic charges, as for instance in case of a pneumatic transfer of powders or in electrostatic spraying of powders coating processes.



To avoid the formation of layers of combustible dust the user must clean the device.

It is recommended to avoid using compressed air for cleaning the layers of dust; use, instead, a suction systems suitable for potentially explosive powders (ATEX certified vacuum cleaner).



**LIGHTNING:** protection against atmospheric discharges.

The plant in which the equipment is being used must be protected against atmospheric discharges.



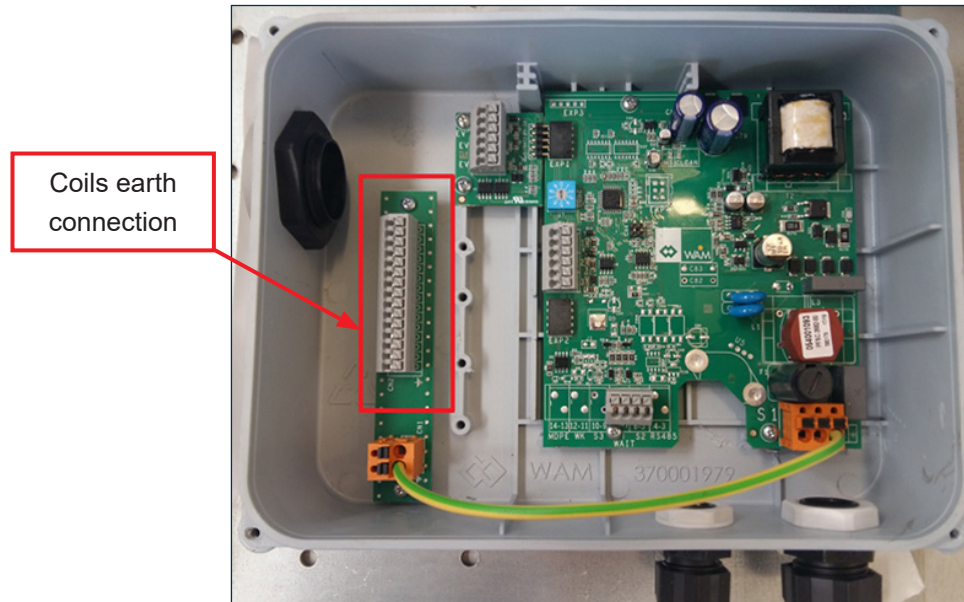
In the classified ZONES and near them there must not be any ignition sources such as:

- flames;
- coals;
- hot surfaces;
- sparks (e.g. caused by cutting of metals);
- stray currents and cathodic protection systems;
- electrical or mechanical features which are not ATEX certified;
- electrostatic charges borne by the operators or mobile equipment;
- radio frequency (RF) and electromagnetic waves (from 104Hz to 3\* 1011Hz);
- electromagnetic waves (from 3x1011Hz to 3x1015Hz);
- ionizing radiations;
- ultrasounds;
- adiabatic compression and shock waves;
- exothermic reactions (including phenomena of self-priming of the powders).

## 2.0 GENERAL FEATURES

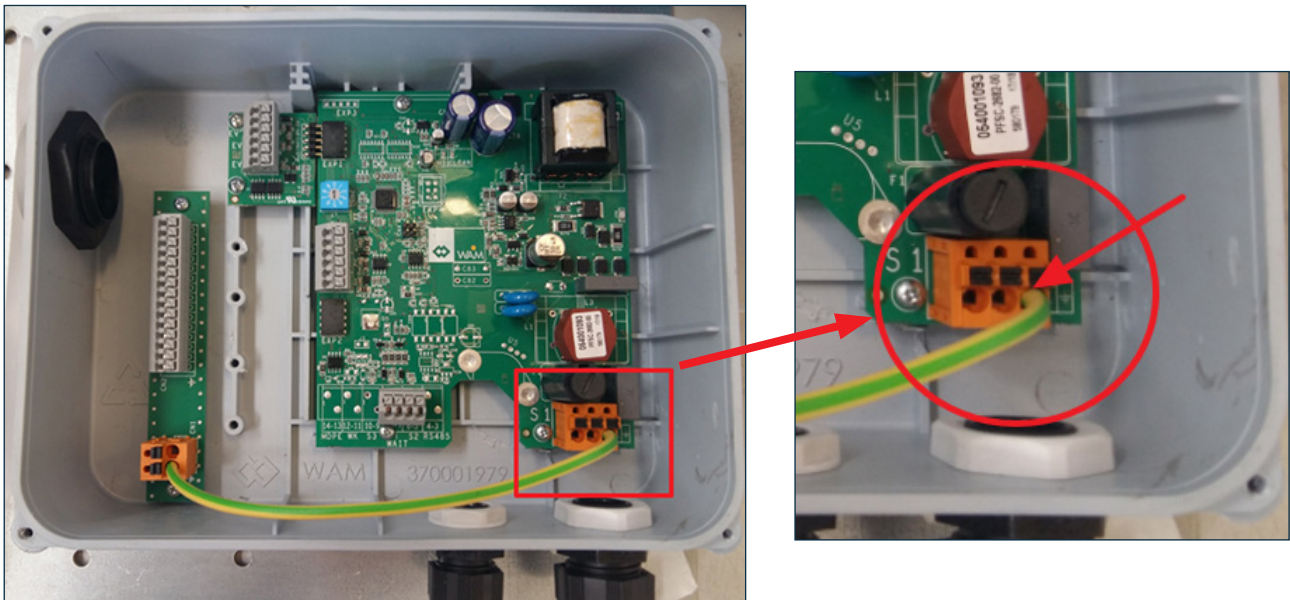
## 2.1 Earthing connection

If the board is purchased along with the machine, the connection to the bounding of the solenoid valve coils is performed by the manufacturer in the junction box shown below:



If the board is purchased as spare, these connections are in charge of the installer and must be performed by qualified personnel.

The earthing connection of the entire board is positioned inside the junction box as indicated below:

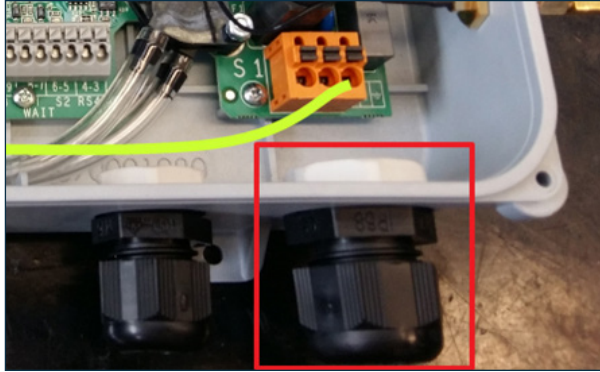
**Important**

**IT IS MANDATORY TO ALWAYS FOLLOW THE INSTRUCTIONS PROVIDED FOR THE CONNECTION OF THE ELECTRONIC BOARD TO THE EARTHING, REGARDLESS THE VALUE OF THE SUPPLY VOLTAGE.**

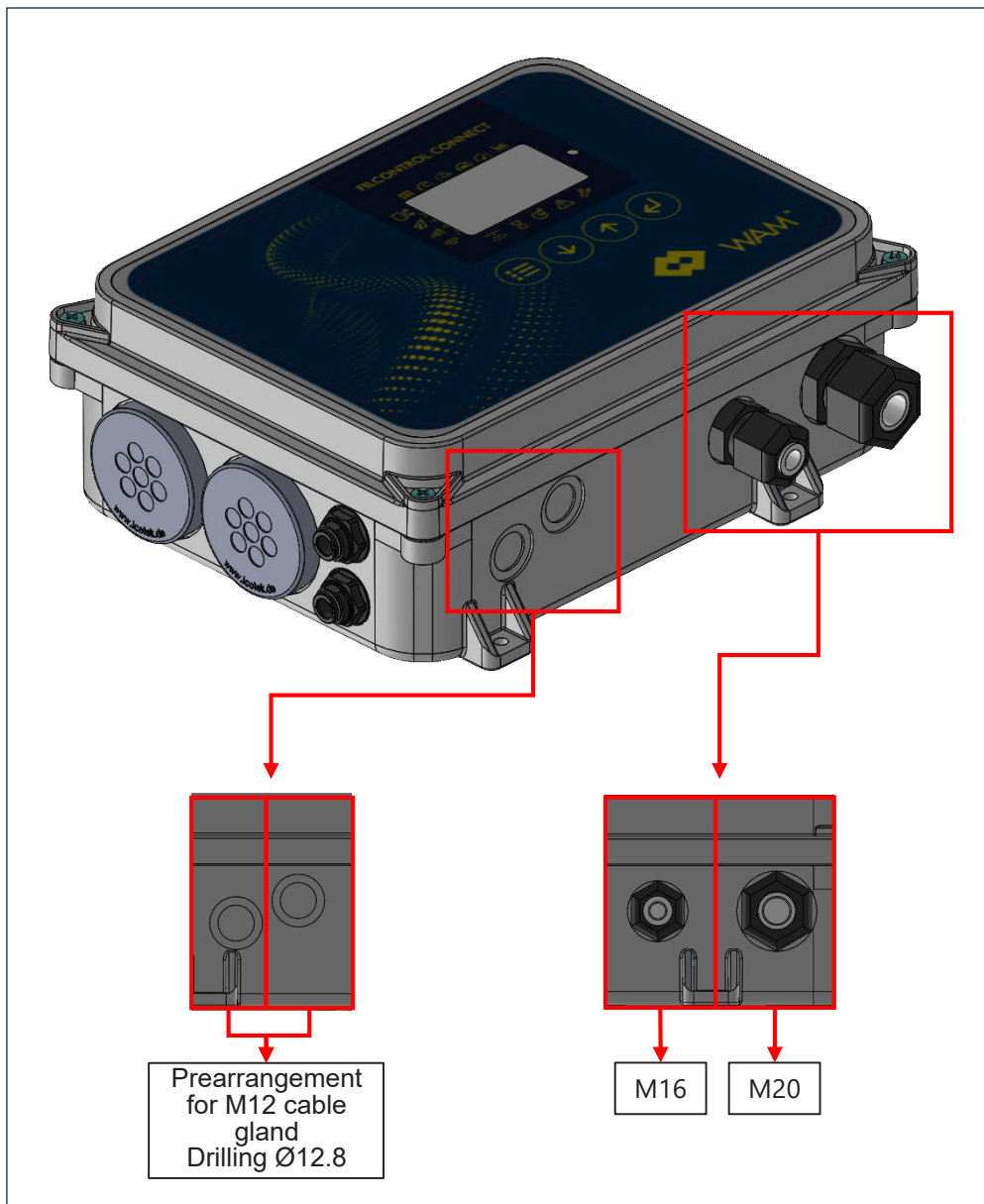
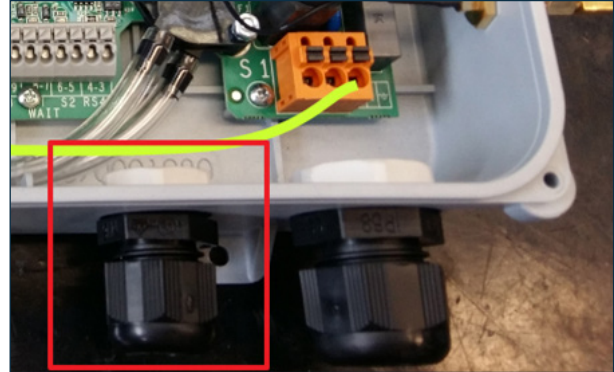
2.0 GENERAL FEATURES

The card is supplied with cable gland certified for the connection to the mains and for any other connections (signals or clean contact):

MAIN POWER SUPPLY

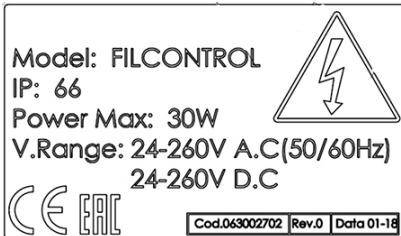


CLEAN CONTACTS



## 2.2 Marking

### FILCONTROL NON ATEX



### FILCONTROL ATEX



CE: CE marking related to the ATEX Directive 2014/34/EU (Dir. 94/9/EC before 19/04/2016)

Ex: Hexagon EX: compliant to the ATEX Directive 2014/34/EU (Dir. 94/9/EC before 19/04/2016)

II: Devices Group (I: electrical equipment for mines, II: electrical appliances for surface installations)

3D: Category 3D, i.e. apparatus suitable for use in ZONE 22

III C: Powders group (conductive dust)

T100: Maximum surface temperature

Dc: EPL Dc, i.e. apparatus suitable for use in ZONE 22

Tamb: ambient temperature



### Danger - Warning

The equipment is not provided with an electrical system. Connection to the mains has to be carried out by an electrician.

Provide mains supply to the equipment concerned according to the compliant current legislation and take into consideration the safety measures required by the installation environment and the envisaged operating conditions.

Before carrying out the connection ensure that the mains voltage and frequency correspond to those indicated on the electric motor rating plate.

Disconnect from the mains before carrying out any work and use suitable devices so that there cannot be an accidental reconnection.

**2.0 GENERAL FEATURES**
**2.3 Limits of use applicable to both model of control boards**

Use electric cables having cross section appropriate to the power absorption of the motor of the equipment concerned.

The installer will have to provide to interfacing the equipment with the necessary controls: start/stop, emergency stop, reset after an emergency stop, in compliance with the regulatory standards in force.

Disconnect from the mains before carrying out any work and use suitable devices so that there cannot be an accidental reconnection.

At each start up ensure the safety devices installed are present and working.

The installer must connect the equipment to the earthing system of the plant.

In case of dust collectors manufactured by **WAM®**, the electronic board is located inside a box with IP66 protection in accordance with the Standard CEI EN 60529.

The board is supplied pre-wired; depending on whether it comes with the dust collector or as spare part, it can have the following features:

| Supply type                               | Preloaded program                            |  |
|---|--|--|
| Electronic board supplied with the filter | Depends on the filter                        |  |
|   | TIME:<br>3.5 Standard programming<br>Page 14 | CONNECT:<br>Par. 4.8.4 Pre-set programs<br>pag. 30 |
| Board supplied as spare                   | Program 0                                    |  |
|   | TIME:<br>3.5 Standard programming<br>Page 14 | CONNECT:<br>Par. 4.8.4 Pre-set programs<br>pag. 30 |

Table 1 - Features of the electronic board depending on the type of supply

The installer has the possibility to customise the program pre-installed by the manufacturer according to specific requirements.


**Important**

**The program must be changed when the board is supplied as a spare part.**

All programs provided include *cleaning at the end of cycle*, which envisages the cleaning of the filtering elements with no reversed air flow, thus optimizing cleaning effectiveness.

The cleaning cycle is predefined on the basis of the program set and gets activated when the contact S2 opens.

The operating features of the electronic boards are the following:

|                                     |   |
|-------------------------------------|---|
| <b>Operating temperature</b>        | - 20°C to 80°C (normal operation); 100°C (peak temperature)   |
| <b>Input power supply</b>           | 24 ± 15% V (AC-DC) => 260 ± 15% V (AC-DC)                     |
| <b>Input supply frequency</b>       | 0 Hz (DC) => 60Hz   |
| <b>Output voltage and frequency</b> | 24±10% (DC) controlled by for coils operation at 24V AC or DC |

Table 2 - Operating features

**2.0 GENERAL FEATURES**
**2.3.1 Electronic board wiring**

- 1) **SUPPLY VOLTAGE** - The electronic board operates with all voltage values from 24V to 260V, both in DC and AC.
- 2) **AUTOMATIC SUPPLY VOLTAGE IDENTIFICATION**- The electronic board identifies the supply voltage automatically, therefore no setting is required for normal operation.
- 3) **CONNECTIONS TO TERMINAL BOARD** - The electronic board is powered by means of terminal (S1) and accepts all the voltages mentioned at point 1) above.

Connect a clean contact (no voltage) to the S2 terminal to enable the cleaning cycle.

| TERMINAL     | TERMINAL NO. ON THE BOARD | FUNCTION   |
|--------------|---------------------------|--|
| <b>S1</b>    | 1 2                       | It's the power supply contact of the electronic board and works with all voltage values previously referred to at point 1 of section 2.3.1.  |
| <b>RS485</b> | 3 4                       | <b>AVAILABLE ONLY ON FILCONTROL CONNECT</b><br>Interface for Modbus communication with an external PC.<br>Select the node that represents the address of the electronic board.   |
| <b>S2</b>    | 5 6                       | It's a normally open contact, not powered, which must be closed to start the cleaning cycle.<br>When it opens, it starts the cleaning at the end of the cycle that continues for a period of time which must be predefined in the program set.<br>NB: the cleaning at the end of cycle starts only after having completed the cleaning cycle on all solenoid valves.   |
| <b>WAIT</b>  | 7 8                       | It's a normally open contact, not powered, which must be closed to temporary stop the cleaning cycle.<br>Use this control to save the solenoid valve which has been last active. When the contact is opened back, if S2 is closed, cleaning resumes from the next solenoid valve. If S2 is open, the cleaning cycle reaches the last solenoid valve present then goes in standby.<br>The WAIT contact can be used as safety switch / alarm to stop temporarily and instantaneously the cleaning cycle. |
| <b>S3</b>    | 9 10                      | <b>AVAILABLE ONLY ON FILCONTROL CONNECT</b><br>It's programmable external signal that can be excluded, selected as normally open or normally closed. When activated, it generates an external signal.  |

Table 3 - List of main contacts

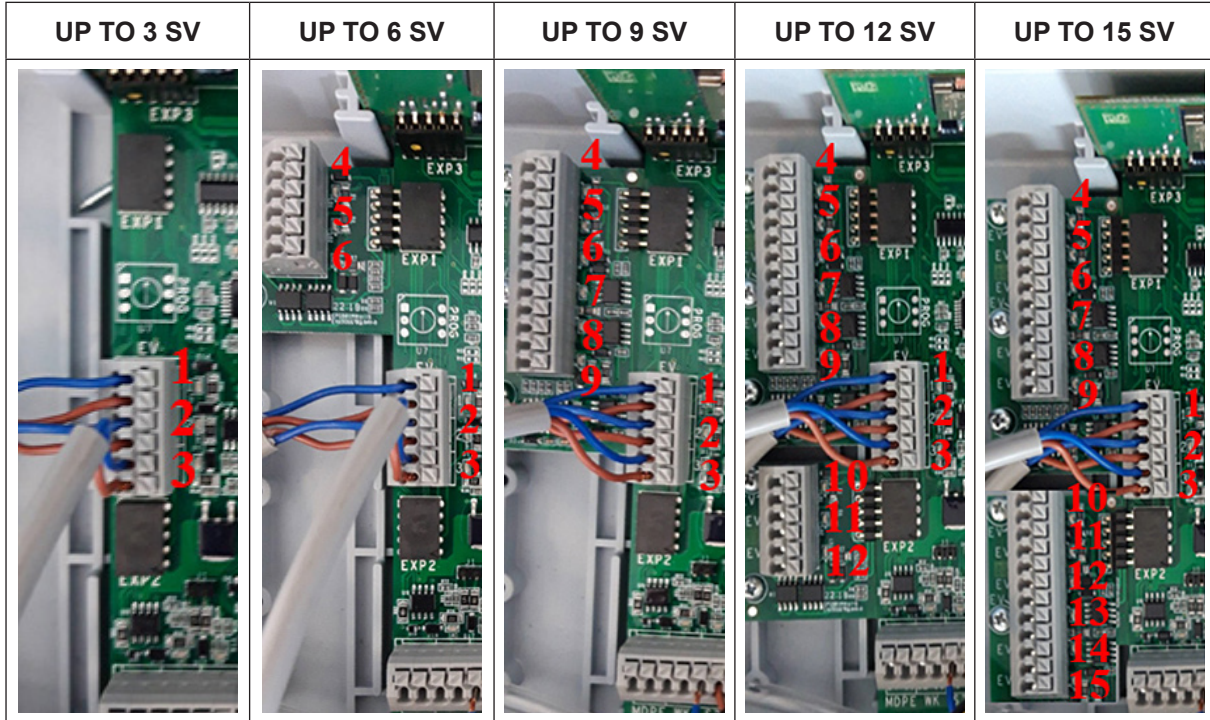

**Important**

**IN CASE OF EMERGENCY, to completely stop the cleaning cycle, disconnect the electronic board from the power supply.**

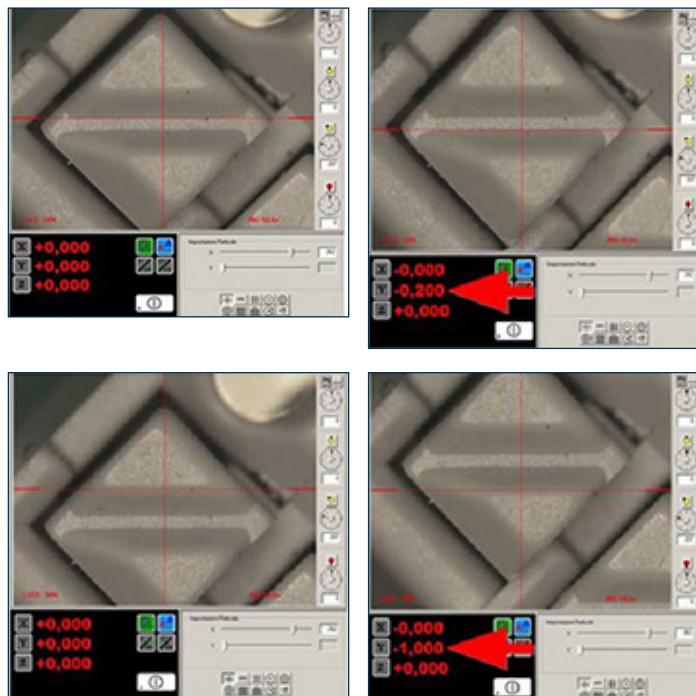
All technical information related to the FILCONTROL electronic board are printed on the rear side of the diagram applied on the cover of the box.

**2.3.2 Connecting the expansion modules for the solenoid valves**

The number of coils can vary from 3 to 15; if their positioning is of the absolute type, the expansion modules must be connected as shown below.


**Important**

The clamps dimensions range between 0.2mm and 1mm, therefore it is recommended to use a cutting tool having the same maximum thickness, more or less.



**2.0 GENERAL FEATURES**
**2.3.3 Electronic board absorption**

The following table contains the values referred to the power absorption of the control board on the basis of the power supply type.

| SUPPLY VOLTAGE (VAC) | CURRENT (A) | POWER (W) |
|----------------------|-------------|-----------|
| 24                   | 0,220       | 5.3       |
| 115                  | 0,090       | 10.4      |
| 230                  | 0,050       | 11.5      |
| 260                  | 0,045       | 11.7      |

Table 4 - Electronic board absorption values depending on the supply voltage


**Important**

The table above refers to some examples of absorption depending on the supply voltage; the electronic board will however work correctly with all values of voltage from  $24 \pm 15\% \text{ V (AC-DC)}$  =>  $260 \pm 15\% \text{ V (AC-DC)}$ .


**Important**

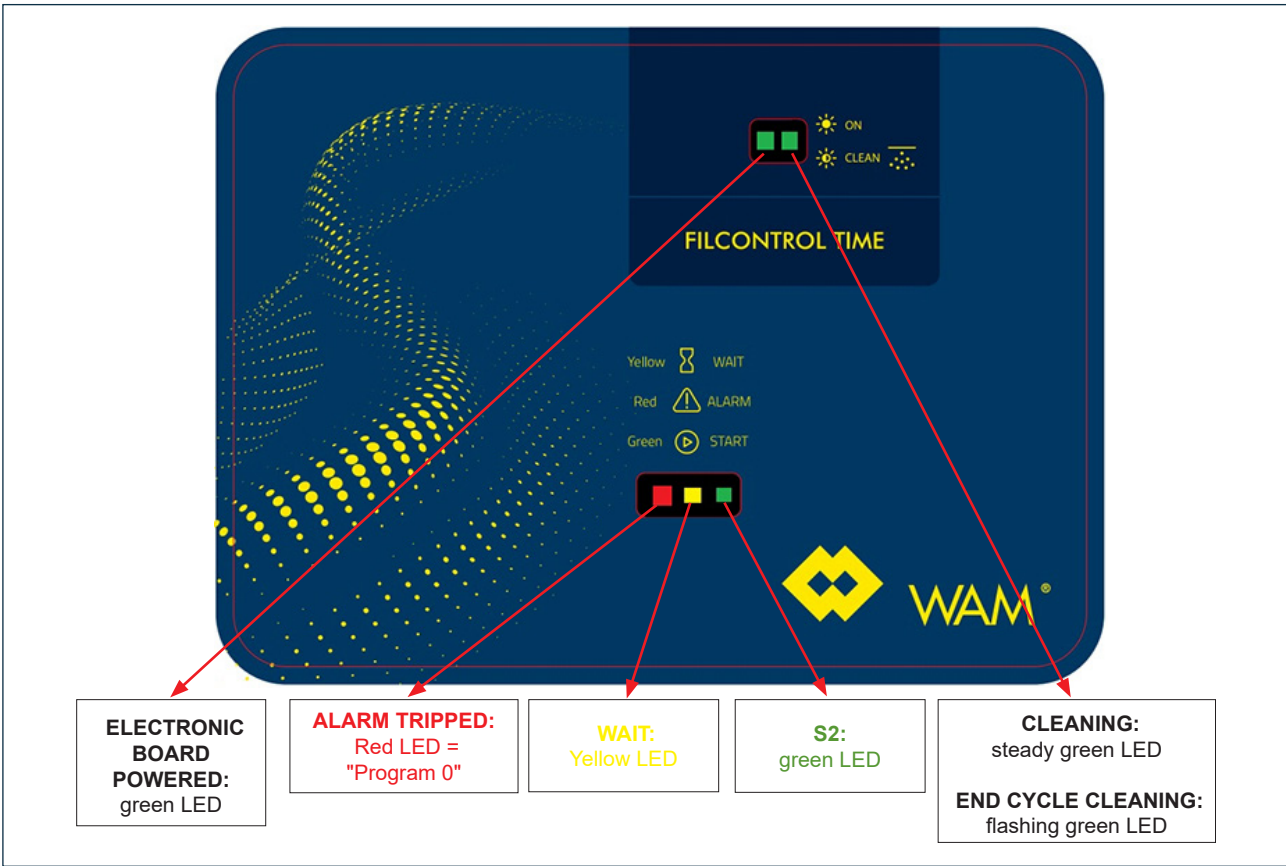
The S1 supply has to be always provided on the panel (disable only for maintenance).

### 3.1 Function

The electronic boards have been designed for the timing of the filter cleaning, according 9 default programs (plus 1 self-test program).

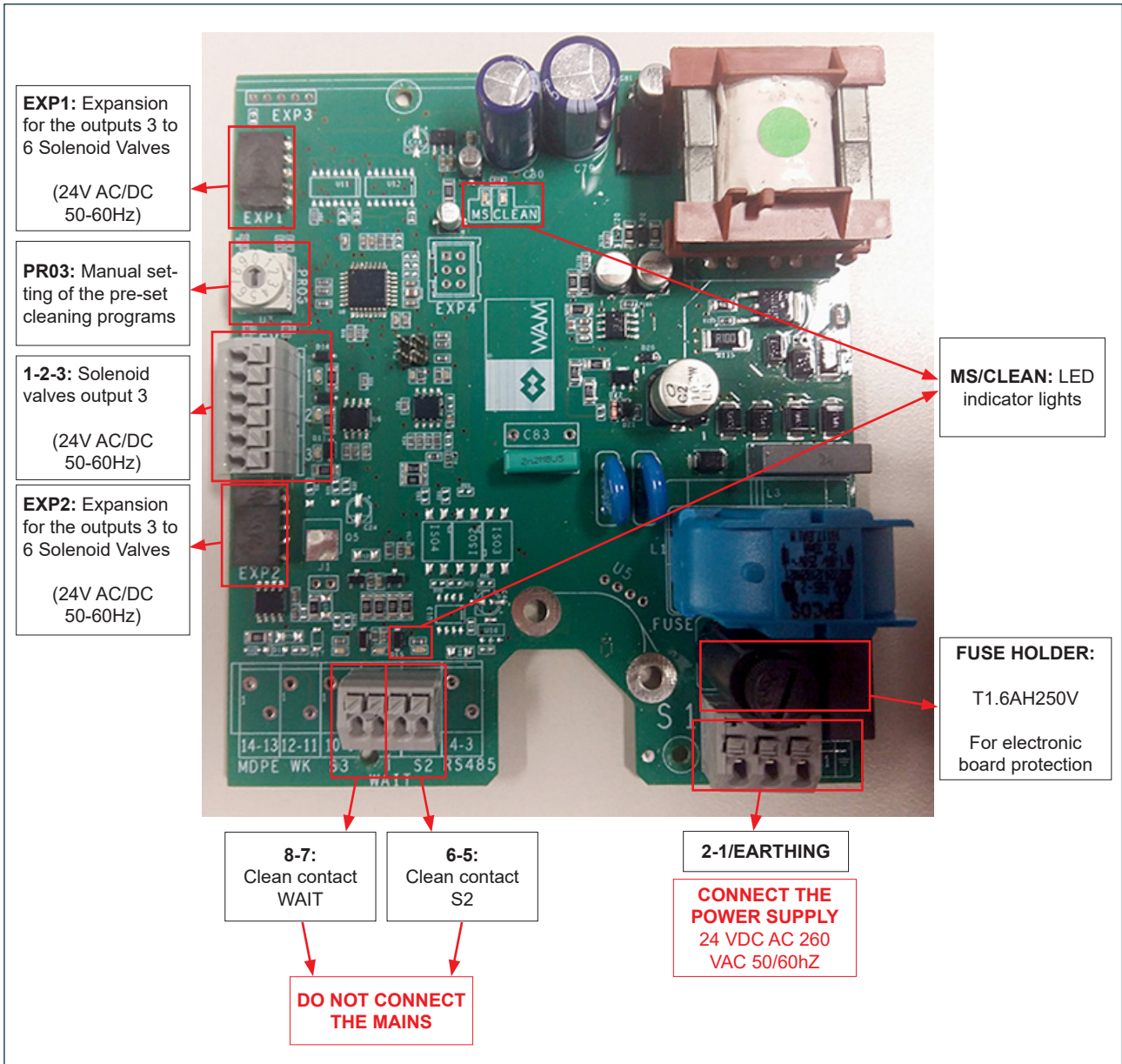
The programs define the pause and blowing, both during normal cleaning and for the cleaning the end of the cycle. This electronic board model **DOES NOT** provide for the management of a MDPE sensor (pressure drop measuring between the dirty and the clean side of the filter).

### 3.2 User interface



**3.3 Connections**

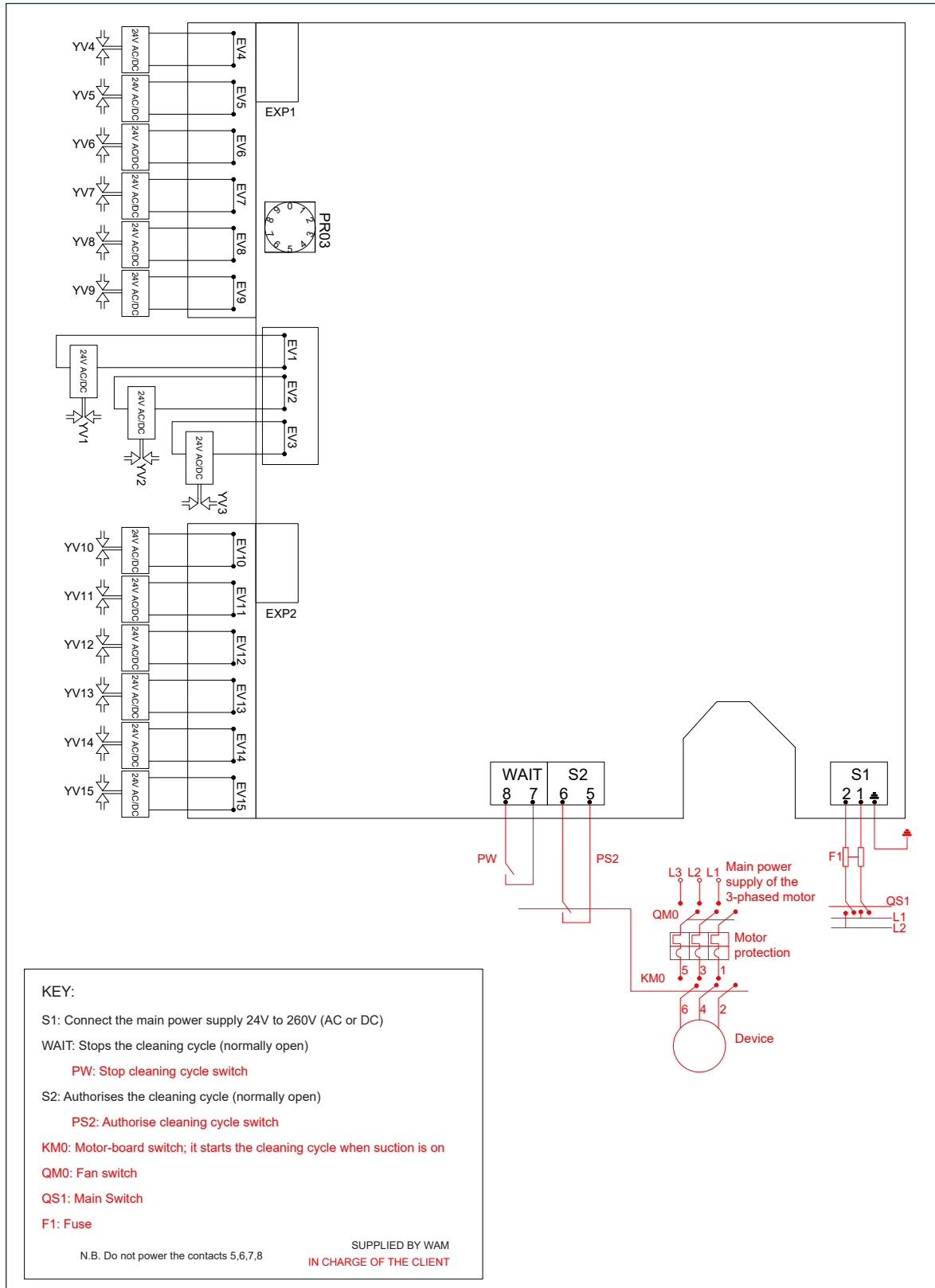
The connections available and their description is given below.



**3.4 Wiring diagram**

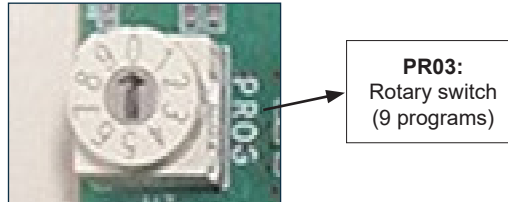
The wiring diagram of the board is given below:

**FILCONTROL TIME**



**3.0 FILCONTROL TIME**
**3.5 Standard programming**

The programs can be customised by using the rotary switch called **PR03** (check the **Section 3.3 Connections** (page 12)). The board goes into alarm status if operated on the 0 program.



| Prog. (D) | Description    | Number [S/V] | Pause time [sec] PAUSE | Blow Time [ms] VALVE | Number of cleaning cycles at the end of cycle* |
|-----------|----------------|--------------|------------------------|----------------------|--|
| 0         | SELF-TEST-TEST | -            | 3                      | 100                  | 1  |
| 1         | SILAB14        | -            | 56                     | 100                  | 7  |
| 2         | SILAB24        | -            | 39                     | 100                  | 7  |
| 3         | PLEATED_28     | -            | 28                     | 100                  | 7  |
| 4         | PLEATED_5      | -            | 5                      | 100                  | 7  |
| 5         | PLEATED_15     | -            | 15                     | 100                  | 7  |
| 6         | BAG/POCKET_5   | -            | 5                      | 210                  | 7  |
| 7         | BAG/POCKET_15  | -            | 15                     | 210                  | 7  |
| 8         | BAG/POCKET_28  | -            | 28                     | 210                  | 7  |
| 9         | BAG/POCKET_56  | -            | 56                     | 210                  | 7  |

\*Each cleaning cycle at the end of cycle includes one blow for each solenoid valve installed.

When the board is provided by the manufacturer installed on a dust collector, the programs are pre-set as follows:

| FILTER ELEMENTS   | PRE-SET PROGRAM |
|---|-----------------|
| SILAB14   | 1               |
| SILAB24   | 2               |
| Filter with cartridges or pleated elements                        | 3               |
| Filter with bags or pockets                                       | 8               |
| Filter with bags or pockets for applications in negative pressure | 9               |


**Important**

**If the board is supplied as spare part, by default it is set to the 0 program; the installer must change the program depending on the type of filter using the previous table.**

**4.0 FILCONTROL CONNECT**
**4.1 Function**

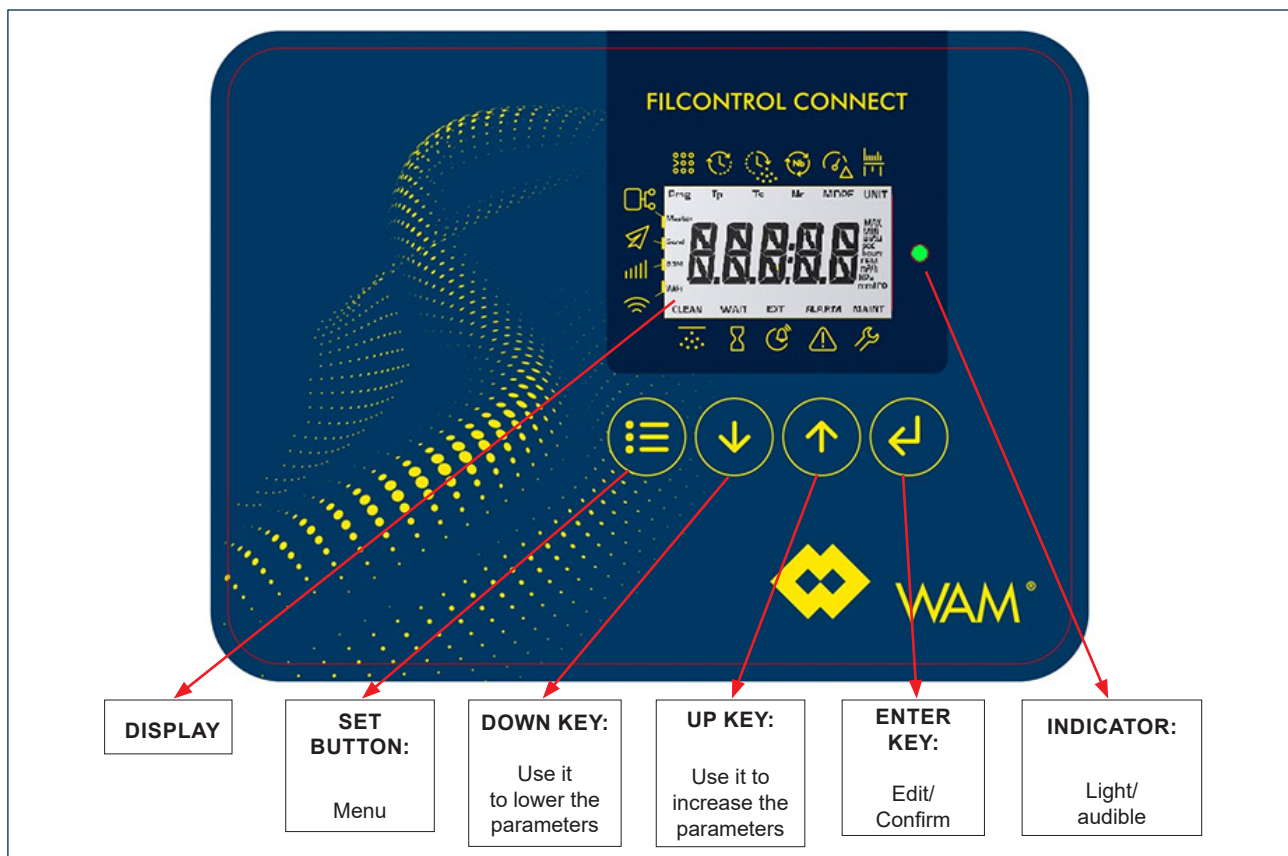
The function of the FILCONTROL CONNECT electronic board is similar to the function of the FILCONTROL TIME version, i.e. it manages the timing of the cleaning cycles of the dust collector. Furthermore, it allows to use additional devices to more effectively manage (by using a display) and control some of the parameters, be it locally or remotely.

The additional features of the version are listed below:

- User interface with touch-screen display;
- Measures and displays the value of  $\Delta P$  through the MDPE sensor;
- 4/20mA output but for proportional transmission of the MDPE signal;
- $\Delta p$  in "ACTIVE" configuration for "smart cleaning";
- Communication with the PLC via Modbus connection RS485;
- Management of external alarms with the contact S3;
- Remote WIFI or GPRS communication modules (option).

**4.2 User interface**






The touch keyboard kit (SET, DOWN, Up, ENTER keys) + LCD display integrated into the cover of the box is connected through a flat cable to the connector **EXP4 (Section 4.3 - page 18)** provided on the FILCONTROL CONNECT board.









The parameters shown on the display are listed below:







The meaning of the symbols used is the following:

| FILTER STATUS INFORMATION BAR   |                          |  |                                       |
|---|--------------------------|--|---------------------------------------|
| KEYPAD ICON   | REFERENCE on the DISPLAY | DESCRIPTION  | EVENT                                 |
|  | <b>CLEAN</b>             | The filter is running the cleaning cycle. When the filter is performing the cleaning at the end of the cycle, the caption "CLEAN" flashes. | During cleaning and in stand-by phase |
|  | <b>WAIT</b>              | Filter in standby, WAIT contact closed: the cleaning cycle is temporary stopped  |                                       |
|  | <b>EXT</b>               | External error, contact S3 active: an alarm has tripped on the board and the cleaning cycle is blocked                                     |                                       |
|  | <b>ALARM</b>             | At least one alarm has tripped   |                                       |
|  | <b>MAINT</b>             | Enable the maintenance mode, which allows programming the board  |                                       |

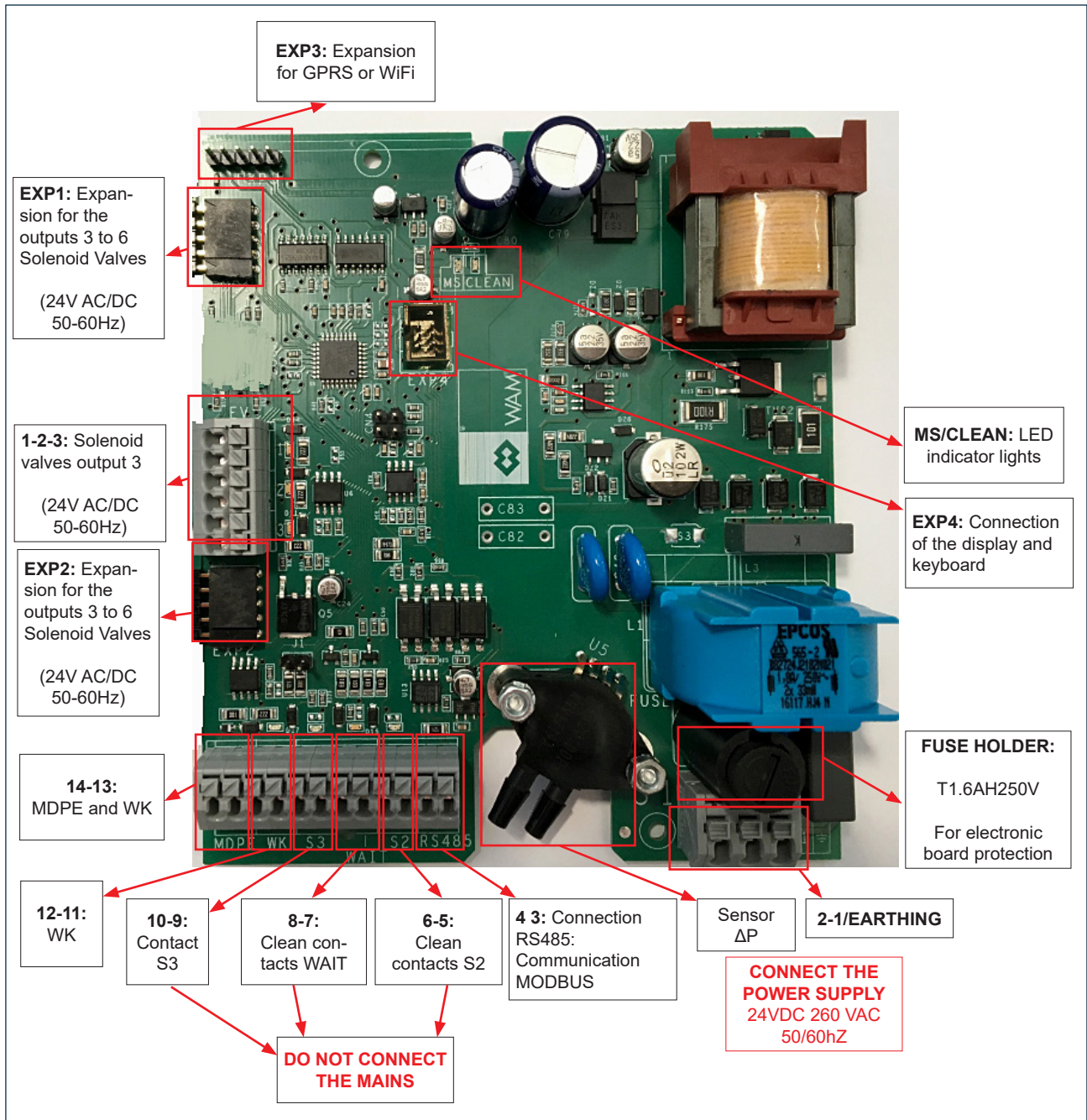
**4.0 FILCONTROL CONNECT**

| CLEANING PROGRAMMING BAR  |                          |  |   |
|---|--------------------------|--|---|
| KEYPAD ICON   | REFERENCE ON THE DISPLAY | DESCRIPTION  | EVENT   |
|    | <b>Prog</b>              | Program set - the display shows the letter "P" followed by the corresponding number  | Info Mode <b>Page 24</b><br>Programming Mode <b>Page 24</b><br>(During cleaning and in standby phase) |
|    | <b>Tp</b>                | Pause Time - the display shows the time, in seconds, between one blow and the next   |   |
|    | <b>Ts</b>                | Blow Time - the display shows the opening time, in seconds, of the solenoid valve  |   |
|    | <b>Nc</b>                | Number of cleaning cycles performed with the S2 disabled   |   |
|   | <b>MDPE</b>              | ΔP Value   |   |
|  | <b>UNIT</b>              | Active in programming, changes the units of measure from the metric system (mmH <sub>2</sub> or m <sup>3</sup> /h) and American system (KPa - CFM) |   |

| INTERCONNECTIVITY BAR   |                          |  |                                       |
|---|--------------------------|--|---------------------------------------|
| KEYPAD ICON   | REFERENCE ON THE DISPLAY | DESCRIPTION                                | EVENT                                 |
|  | <b>Master</b>            | Active when the network RS485 is connected | During cleaning and in stand-by phase |
|  | <b>Send</b>              | Active when a message is sent              |                                       |
|  | <b>GSM</b>               | Active when the module GPRS is active      |                                       |
|  | <b>WiFi</b>              | Active when the WiFi module is active      |                                       |

**4.3. Connections**

The connections available and their description is given below.



On the FILCONTROL CONNECT board, the contact S3 has the purpose to enable an external signal, while the contact RS485 (4 3) is used to enable the communication towards an external device (e.g. PC).

It also features the MDPE for the reading of the pressure difference between the clean and unclean part and the programmable outputs associated with it: alarm WK (11 12) and analogue signal [4-20 mA] (13-14) for proportional transmission of the value of  $\Delta P$ .


**Important**

The terminals PIN Output 3, WK, S3, WAIT, S2, RS485 dimensions range between 0.2mm and 1mm, therefore it is recommended to use a cutting tool having the same maximum thickness, more or less (see the photo on page 9).

**Connection data**

|   |   |
|---|---|
| Connection technology                             | Push-in CAGE CLAMP*                     |
| Enabled by  | Push-button                             |
| Rigid conductor                                   | 0,2...1,5 mm <sup>2</sup> / 24...16 AWG |
| Flexible conductor                                | 0,2...1,5 mm <sup>2</sup> / 24...16 AWG |
| Flexible conductor with plastic-insulated bushing | 0,25...1 mm <sup>2</sup>                |

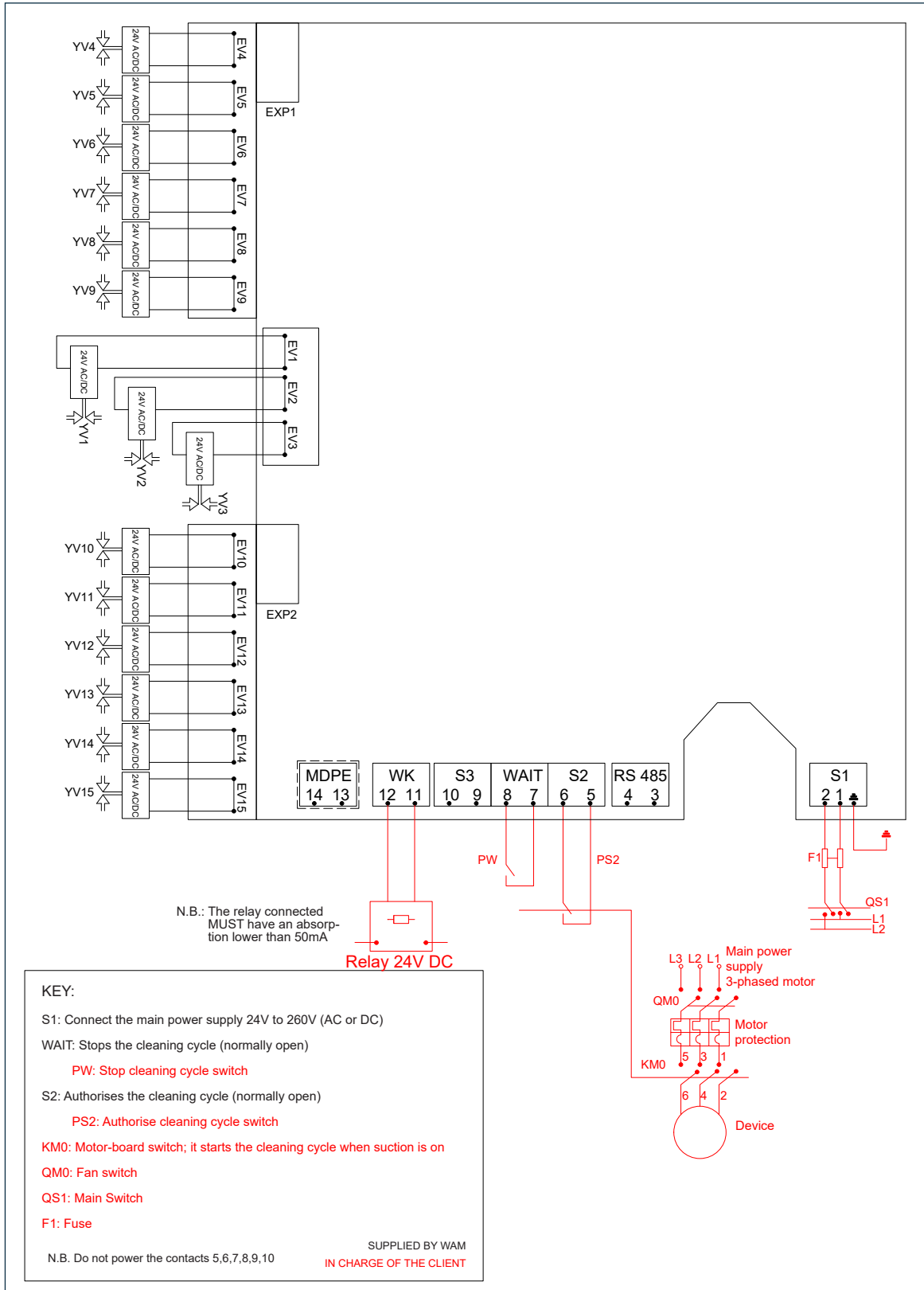
**Geometric data**

|                     |                      |
|---------------------|----------------------|
| Pin spacing         | 3,5 mm / 0,138 inch  |
| Width               | 43,5 mm / 1,713 inch |
| Height              | 16,7 mm / 0,657 inch |
| Height above ground | 13,1 mm / 0,516 inch |
| Depth               | 12 mm / 0,472 inch   |

4.4 Wiring diagram and external connections

The wiring diagram of the board is given below:

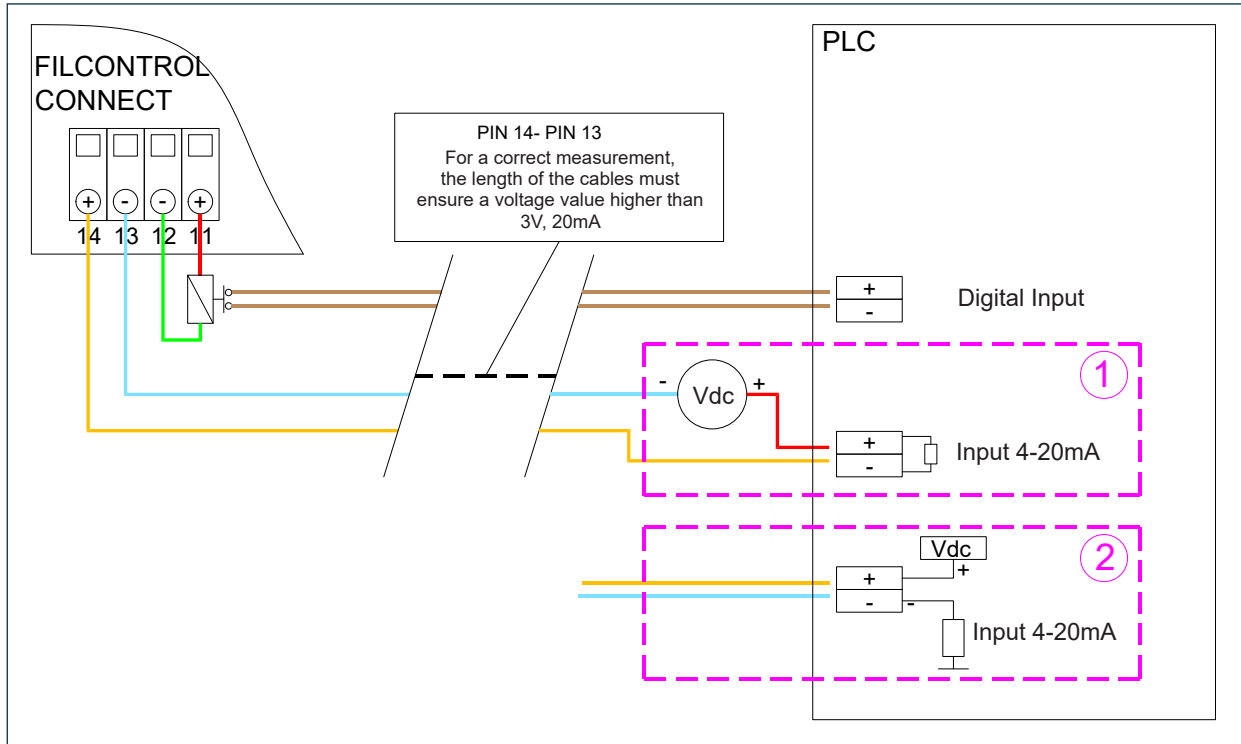
FILCONTROL CONNECT



**4.4.1 Wiring diagram for the connection of the MDPE and WK output**

The wiring of the programmable outputs is shown below:

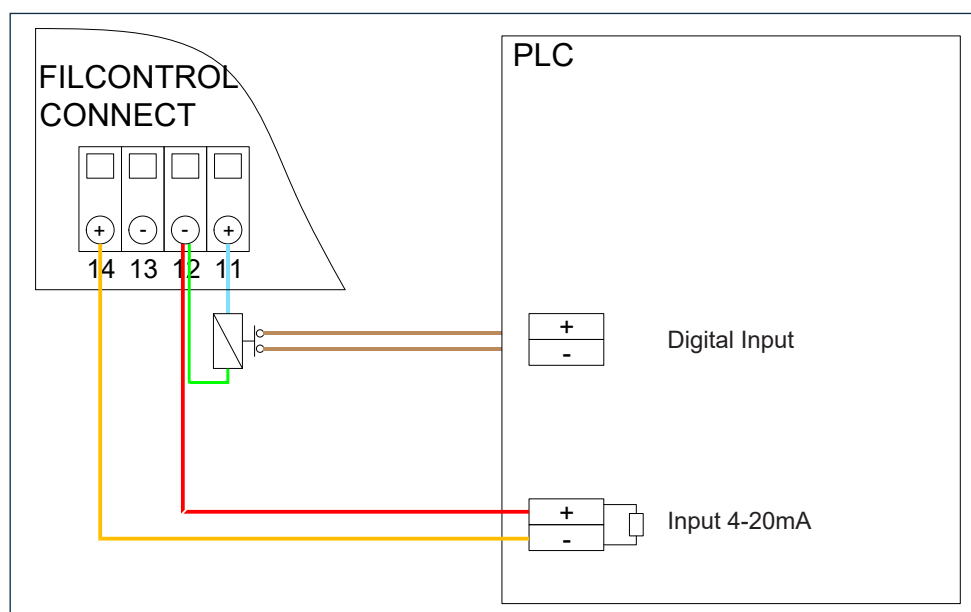
1. **PASSIVE signal:** voltage supplied by the external device



As regards the output 14-13, there are two cases:

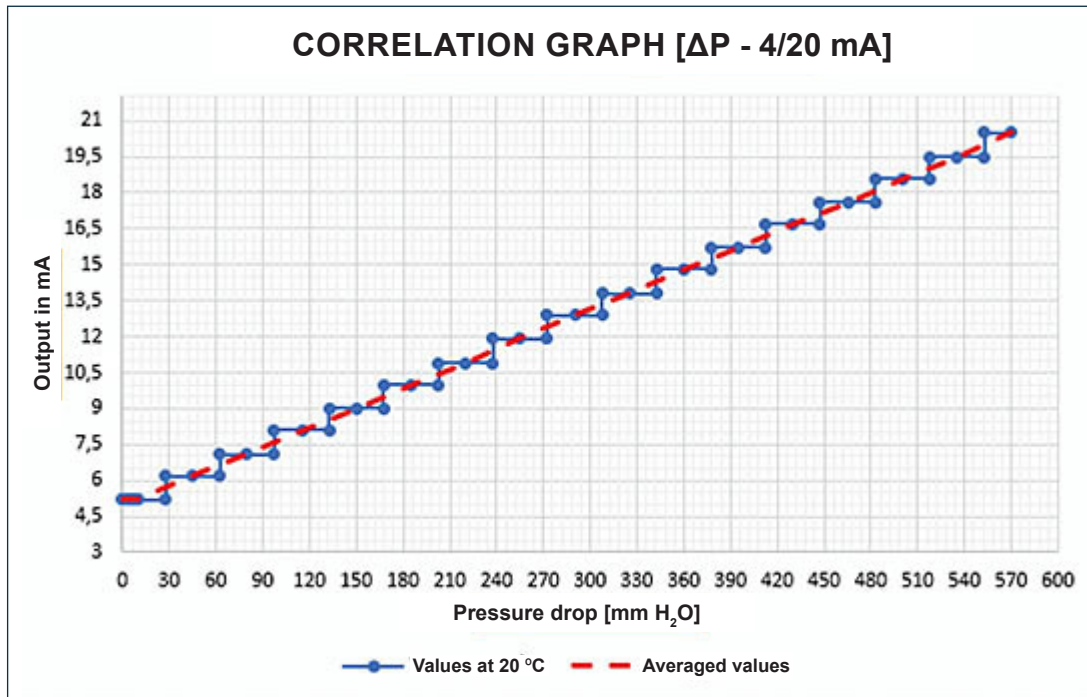
- 1) Power is supplied by an external device
- 2) Power is supplied from the PLC

2. **ACTIVE signal:** voltage fed by FILCONTROL CONNECT



**4.4.2 MDPE output control with 4-20mA**

The function of this 4-20mA output is to provide a value proportional to the pressure read by the MDPE sensor; the correlation scale is the following:



Find below some tabulated values, the rest is directly proportional:

| P<br>[mmH <sub>2</sub> O] | P<br>[KPA] | I<br>[mA] |
|---------------------------|------------|-----------|
| 0                         | 0          | 5.2       |
| 570                       | 5,7        | 20,5      |


**Danger - Warning**

It is **FORBIDDEN** to blow or alter the inlet or outlet tubes of the MDPE sensor, since doing so can cause it to break.


**Important**

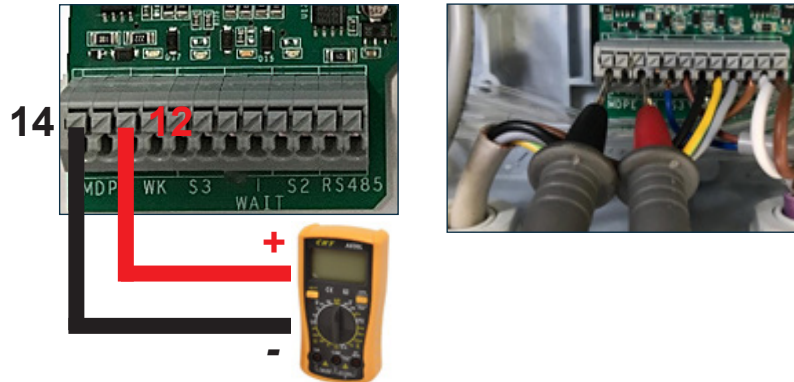
The MDPE output is based on a non-temperature-compensated circuit.

As shown in the graph above, the correlation between pressure drop and mA is not linear, but by degrees, and the exact value may be slightly influenced by the temperature (the graph shows reference values at 20 °C).

4.0 FILCONTROL CONNECT

To manually check the correct operation of the MDPE signal, proceed as follows:

➤ Connect the tester to the pin 12 and 14:



➤ Read the output voltage or current:

Output in VOLT



Output in mA



If the voltage value shown ranges between 3 and 24V and the current value is about 5mA with the hoses disconnected, the electronic board is working properly.

If the voltage value is shown, but the current value it is not, the tester could have problems (e.g. blown fuse).




**Important**

**In the event of reading problems, perform calibration as indicated in the section 4.8.2 MDPE Calibration (page 27).**

#### 4.5 How to switch on the electronic board

As soon as the board is powered a voltage value that matches the specifications, a "run test" starts as follows:

- 1) the Power LED indicator light gets lit and the indicator light (LED CLEAN) turns from red into green; the display shows the firmware revision (RV1XX) and READY;
- 2) it is run a compatibility test on the solenoid valves (each corresponding LED blinks):  
FILCONTROL CONNECT checks if the program set is aligned to the number of solenoid valves connected:

if it is not, an ALARM message is shown; by pressing for 5 seconds the key "SEL",  and then again

the key "SEL" : ERR1 is shown.

At the end of the "run test", when the contact S2 is closed, the board starts the normal cleaning regardless of the fact that alarms have tripped, on condition that "WAIT" is not closed and the contact S3 is not active, depending on how it has been configured (*see section 4.9.4. - page 34*).



#### Important

**When FILCONTROL runs the program "0" (test program), the red LED on the board is lit.**

#### 4.6 Main controls

CLEANING: it starts after the contact S2 closes, the display shows the message CLEAN (steady);

CLEANING AT THE END OF CYCLE: starts automatically, after the contact S2 has opened; the display shows CLEAN flashing on the screen;

WAIT: it starts after the related contact closes, the display shows the caption WAIT steady on the screen;

S3: it is activated by an external signal; the display shows EXT.



#### 4.7 INFO mode



#### Important

**The electronic board shows always the value of  $\Delta p$  expressed in the unit of measurement selected.**


The Info Mode allows reading the values set and detected by the board.

To enter this mode, press "SEL"  for 5 seconds; in the bottom right corner the display shows **MAINT** (flashing). Use the key "SEL"  to scroll through the following parameters:

- > Operation hours
- > Alarms (if any)
- >  $\Delta P$
- > Air consumption
- > Program set
- > Pause time
- > Blowing time
- > Number of cleaning cycles at the end of cycle
- > READ / ACTIVE
- > MDPE MIN
- > MDPE MAX
- > MDPE HIGH

No programming is possible on this page.

## 4.8 Simplified programming

To access the board parameters programming menu, press "ENTER"  for 5 seconds, the displays shows "MAINT" steady on the screen.

### 4.8.1 How to customise a program



#### **Danger - Warning**

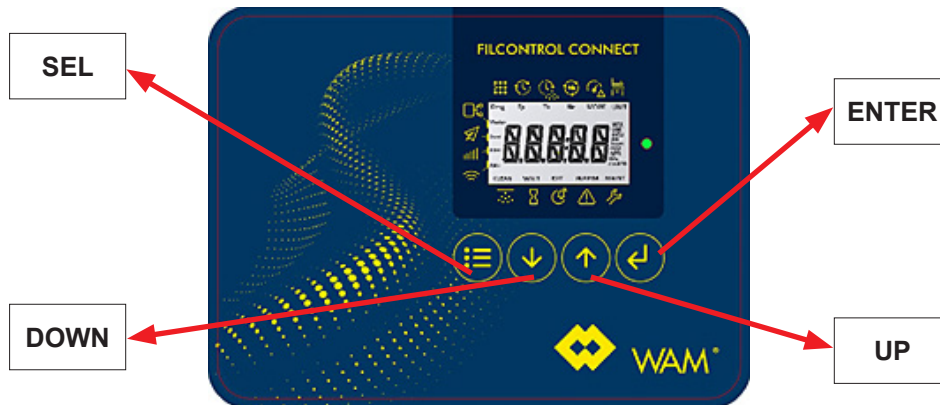
**Warning: make sure the control board is powered before starting to program it.  
The solenoid valve cables must be connected and the S2 contact must be opened.  
The programming must be performed with the cover closed, by an operator previously trained and specialized.**

The programs from 0 to 63 described in the section **4.8.4 Pre-set programs (page 30)** contain information on the number of solenoid valves, on the solenoid valves management type, and on the differential pressure values (max., min., high).















#### **How to customise a program**

If the board is supplied along with the filter, the programs will be pre-set according to the type of machine; if supplied as spare part, the control board will be set on the program 0. If in the first case the installer decides how to customise the program, in the second case, to be able to run correctly the cleaning of the filter it is necessary to customise the program.

The main controls of the board are given below:

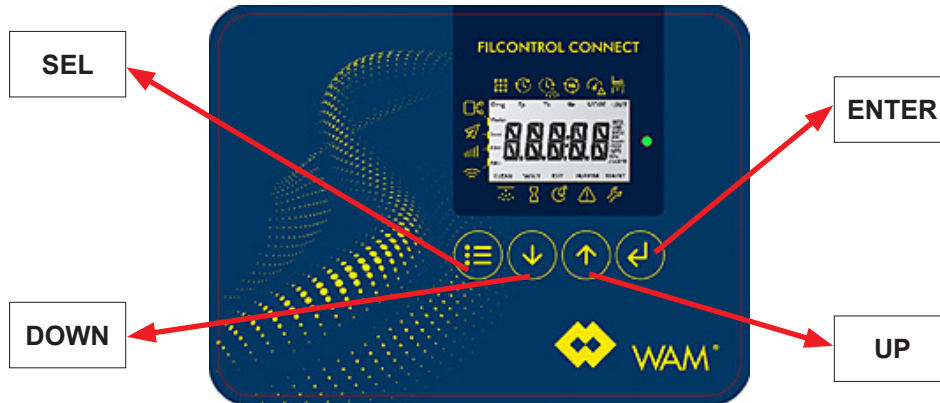

**Important**

**Prior to starting the programming, disable the cleaning, i.e. the contact S2 key must be in the open position.**

| ACTION  | INFORMATION SHOWN ON THE DISPLAY   |
|---|--|
| 1. Press and hold the "ENTER" key  for 5 seconds until "MAINT" is shown steady on the lower part of the display. Simultaneously, it is shown the program which has been pre-set on the control board. |   |
| 2. Press the "ENTER" key  to change the selected parameter; the program number (in this case "3") will blink on the display.   |  |
| 3. Press the "UP" key  until you find the number of the program to be set that flashes.  |  |
| 4. Press the "ENTER" key  ; the selected program number shown on the display stops flashing.   |  |
| 5. Press the "SET" key  until the display shows the message "ABORT".   |  |
| 6. Press the "SET" key  until the display shows the message "SAVE".  |  |
| 7. Press the "ENTER" key  .  |  |
| At the end of this procedure, the program is modified correctly.  |  |


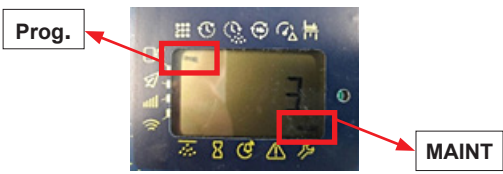




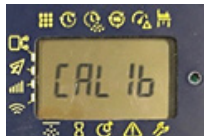



**4.8.2 MDPE Calibration**

When the display shows P>0 **WITHOUT** any air flow passing through the filter, it is necessary to calibrate the sensor MDPE.


**Important**

**Prior to starting the programming, disable the cleaning cycle, i.e. the contact S2 key must be in open position.**

**Disconnect the pipes connected to the sensor.**

| ACTION   | INFORMATION SHOWN ON THE DISPLAY   |
|--|--|
| 1. Press and hold the "ENTER" key  for 5 seconds until "MAINT" is shown steady on the lower part of the display. Simultaneously, it is shown the program which has been pre-set on the control board. |  |
| 2. Press the "SEL" key  until the display shows the message "READ".   |  |
| 3. To change the selected parameter, press the key "ENTER"  ; the message "Read" flashes on the display.  |  |
| 4. Press the "UP" key  until you find the message "CALIB" that flashes on the display.  |  |
| 5. Press the "ENTER" key  ; the message "CALIB" shown on the display stops flashing.  |  |
| 6. Press the "UP" key  for 5 seconds until the display shows P=0.   |  |
| At the end of this procedure, the calibration is finished successfully.  |  |


**Important**

**N.B.: Do not blow or alter the tubes at the inlet or outlet of the MDPE sensor, since it can cause them to break; in case of reading errors, run with the calibration procedure previously described.**

**4.8.3 Smart cleaning**
**4.8.3.1 Function**

This mode is designed to allow cleaning only when needed, reducing though the air consumption and the strain on the filtering elements.

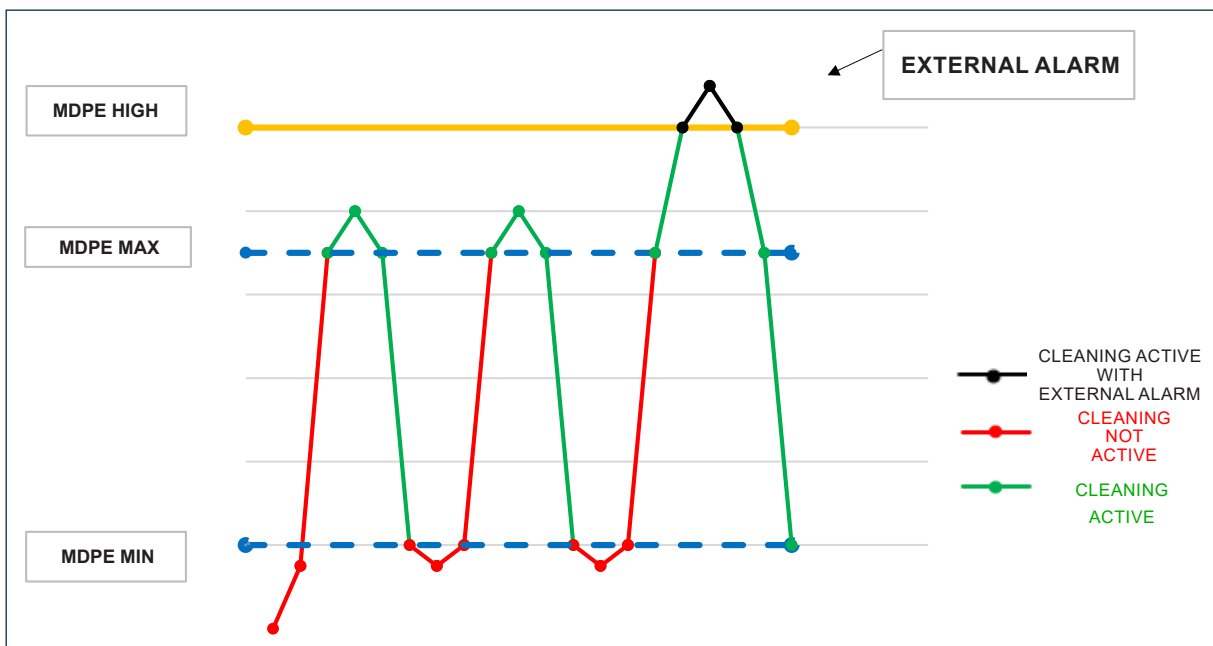
The parameters linked to smart cleaning are the following:

- > MDPE MIN
- > MDPE MAX
- > MDPE HIGH


**Important**

**When the program is changed, the values previously recorded change depending on the program itself (section 4.8.4 Pre-set programs, page 30).**

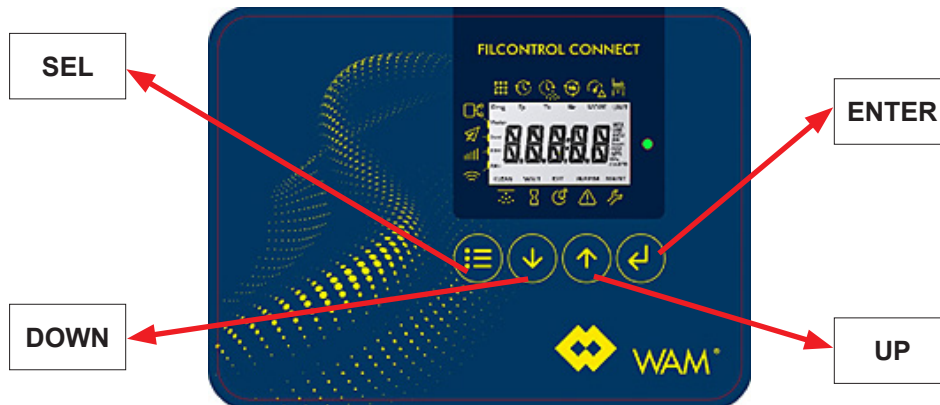
Check the chart below for further info:


**Important**














**The MDPE MIN, MDPE MAX, MDPE HIGH values can be modified manually (check the section 4.9.2 Custom values - page 33).**

**4.8.3.2 How to activate the smart cleaning**

To activate the smart cleaning, run the following commands:

**4.0 FILCONTROL CONNECT**

**Important**

**Prior to starting the programming, disable the cleaning, i.e. the contact S2 key must be in the open position.**

| ACTION  | INFORMATION SHOWN ON THE DISPLAY  |
|---|---|
| 1. Press and hold the "ENTER" key  for 5 seconds until "MAINT" is shown steady on the lower part of the display. Simultaneously, it is shown the program pre-set on the board. |    |
| 2. Press the "SEL" key  until the display shows the message "READ".  |  |
| 3. Press the "ENTER" key  to change the selected parameter; the "READ" message blinks on the display.  |   |
| 4. Press the "UP" key  until the display shows the message "ACTI".   |  |
| 5. Press the "ENTER" key  ; the message "ACTI" shown on the display stops flashing.  |   |
| 6. Press the "SET" key  until the display shows the message "ABORT".   |  |
| 7. Press the "UP" key  until the display shows the message "SAVE".   |  |
| 8. Press the "ENTER" key.    |   |
| The procedure for the activation of the smart cleaning has been successfully completed.   |   |

**4.0 FILCONTROL CONNECT**
**4.8.4 Pre-set programs**

The number of pre-set programs depends on the type of the machine supplied:

| Prog. (D) | Description                                       | Number [S/V] | Tp [sec] | Ts [msec] | Number of air blows at the end of the cycle | "Tp" End of cycle [sec] | MDPE Max [mmH <sub>2</sub> O] | MDPE Min [mmH <sub>2</sub> O] | MDPE High [mmH <sub>2</sub> O] |
|-----------|---|--------------|----------|-----------|---|-------------------------|-------------------------------|-------------------------------|--------------------------------|
| 0         | SELF-TEST   | -            | 5        | 100       | 1   | 5                       | 000                           | 000                           | 000                            |
| 1         | SILAB14   | 2            | 56       | 100       | 7   | 5                       | 90                            | 20                            | 400                            |
| 2         | SILAB24   | 3            | 39       | 100       | 7   | 5                       | 90                            | 20                            | 400                            |
| 3         | SILOTOPR03  | 3            | 28       | 100       | 7   | 5                       | 90                            | 20                            | 400                            |
| 4         | ROUND FILTER FN/FNX (W) POLYPLEAT - 2 S/V         | 2            | 28       | 100       | 7   | 5                       | 90                            | 20                            | 200                            |
| 5         | ROUND FILTER FN/FNX (W) POLYPLEAT - 3 S/V         | 3            | 28       | 100       | 7   | 5                       | 90                            | 20                            | 200                            |
| 6         | ROUND FILTER FN/FNX (W) POLYPLEAT - 4 S/V         | 4            | 28       | 100       | 7   | 5                       | 90                            | 20                            | 200                            |
| 7         | ROUND FILTER FN/FNX (W) POLYPLEAT - 5 S/V         | 5            | 28       | 100       | 7   | 5                       | 90                            | 20                            | 200                            |
| 8         | ROUND FILTER FN/FNX (W) POLYPLEAT - 6 S/V         | 6            | 28       | 100       | 7   | 5                       | 90                            | 20                            | 200                            |
| 9         | ROUND FILTER FN/FNX (S/C) WITH CARTRIDGES - 1 S/V | 1            | 28       | 100       | 7   | 5                       | 90                            | 20                            | 200                            |
| 10        | ROUND FILTER FN/FNX (S/C) WITH CARTRIDGES - 2 S/V | 2            | 28       | 100       | 7   | 5                       | 90                            | 20                            | 200                            |
| 11        | ROUND FILTER FN/FNX (S/C) WITH CARTRIDGES - 3 S/V | 3            | 28       | 100       | 7   | 5                       | 90                            | 20                            | 200                            |
| 12        | ROUND FILTER FN/FNX (S/C) WITH CARTRIDGES - 4 S/V | 4            | 28       | 100       | 7   | 5                       | 90                            | 20                            | 200                            |
| 13        | ROUND FILTER FN/FNX (S/C) WITH CARTRIDGES - 5 S/V | 5            | 28       | 100       | 7   | 5                       | 90                            | 20                            | 200                            |
| 14        | ROUND FILTER FN/FNX (S/C) WITH CARTRIDGES - 6 S/V | 6            | 28       | 100       | 7   | 5                       | 90                            | 20                            | 200                            |
| 15        | ROUND FILTER FN/FNX WITH BAGS - 1 S/V             | 1            | 28       | 210       | 5   | 5                       | 90                            | 20                            | 200                            |
| 16        | ROUND FILTER FN/FNX WITH BAGS - 2 S/V             | 2            | 28       | 210       | 5   | 5                       | 90                            | 20                            | 200                            |
| 17        | ROUND FILTER FN/FNX WITH BAGS - 3 S/V             | 3            | 28       | 210       | 5   | 5                       | 90                            | 20                            | 200                            |
| 18        | ROUND FILTER FN/FNX WITH BAGS - 4 S/V             | 4            | 28       | 210       | 5   | 5                       | 90                            | 20                            | 200                            |
| 19        | ROUND FILTER FN/FNX WITH BAGS - 5 S/V             | 5            | 28       | 210       | 5   | 5                       | 90                            | 20                            | 200                            |
| 20        | ROUND FILTER FN/FNX WITH BAGS - 6 S/V             | 6            | 28       | 210       | 5   | 5                       | 90                            | 20                            | 200                            |
| 21        | ROUND FILTER FN/FNX WITH ELLIPTIC BAGS- 2 S/V     | 2            | 28       | 210       | 5   | 5                       | 90                            | 20                            | 200                            |
| 22        | ROUND FILTER FN/FNX WITH ELLIPTIC BAGS- 3 S/V     | 3            | 28       | 210       | 5   | 5                       | 90                            | 20                            | 200                            |
| 23        | ROUND FILTER FN/FNX WITH ELLIPTIC BAGS- 4 S/V     | 4            | 28       | 210       | 5   | 5                       | 90                            | 20                            | 200                            |
| 24        | POLYGONAL FILTER FP/FPX (W) POLYPLEAT -3 S/V      | 3            | 28       | 100       | 7   | 5                       | 90                            | 20                            | 200                            |
| 25        | POLYGONAL FILTER FP/FPX (W) POLYPLEAT - 4 S/V     | 4            | 28       | 100       | 7   | 5                       | 90                            | 20                            | 200                            |
| 26        | POLYGONAL FILTER FP/FPX (W) POLYPLEAT - 5 S/V     | 5            | 28       | 100       | 7   | 5                       | 90                            | 20                            | 200                            |
| 27        | POLYGONAL FILTER FP/FPX (W) POLYPLEAT - 6 S/V     | 6            | 28       | 100       | 7   | 5                       | 90                            | 20                            | 200                            |
| 28        | POLYGONAL FILTER FP/FPX (W) POLYPLEAT - 7 S/V     | 7            | 28       | 100       | 7   | 5                       | 90                            | 20                            | 200                            |
| 29        | POLYGONAL FILTER FP/FPX (W) POLYPLEAT - 8 S/V     | 8            | 28       | 100       | 7   | 5                       | 90                            | 20                            | 200                            |
| 30        | POLYGONAL FILTER FP/FPX (W) POLYPLEAT - 10 S/V    | 10           | 28       | 100       | 7   | 5                       | 90                            | 20                            | 200                            |
| 31        | POLYGONAL FILTER FP/FPX (T) WITH POCKETS - 3 S/V  | 3            | 28       | 210       | 5   | 5                       | 90                            | 20                            | 200                            |
| 32        | POLYGONAL FILTER FP/FPX (T) WITH POCKETS - 4 S/V  | 4            | 28       | 210       | 5   | 5                       | 90                            | 20                            | 200                            |
| 33        | POLYGONAL FILTER FP/FPX (T) WITH POCKETS - 5 S/V  | 5            | 28       | 210       | 5   | 5                       | 90                            | 20                            | 200                            |
| 34        | POLYGONAL FILTER FP/FPX (T) WITH POCKETS - 6 S/V  | 6            | 28       | 210       | 5   | 5                       | 90                            | 20                            | 200                            |
| 35        | POLYGONAL FILTER FP/FPX (T) WITH POCKETS - 7 S/V  | 7            | 28       | 210       | 5   | 5                       | 90                            | 20                            | 200                            |
| 36        | POLYGONAL FILTER FP/FPX (T) WITH POCKETS - 9 S/V  | 9            | 28       | 210       | 5   | 5                       | 90                            | 20                            | 200                            |
| 37        | POLYGONAL FILTER FP/FPX (T) WITH POCKETS - 10 S/V | 10           | 28       | 210       | 5   | 5                       | 90                            | 20                            | 200                            |
| 38        | POLYGONAL FILTER FP/FPX (T) WITH POCKETS - 12 S/V | 12           | 28       | 210       | 5   | 5                       | 90                            | 20                            | 200                            |



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# FILCONTROL TIME & FILCONTROL CONNECT

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## 4.0 FILCONTROL CONNECT

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| Prog. (D) | Description   | Number [S/V] | Tp [sec] | Ts [msec] | Number of air blows at the end of the cycle | "Tp" End of cycle [sec] | MDPE Max [mmH <sub>2</sub> O] | MDPE Min [mmH <sub>2</sub> O] | MDPE High [mmH <sub>2</sub> O] |
|-----------|---|--------------|----------|-----------|---|-------------------------|-------------------------------|-------------------------------|--------------------------------|
| 39        | HOPPERTOP - 1 S/V   | 1            | 28       | 100       | 7   | 5                       | 90                            | 40                            | 400                            |
| 40        | FLT04   | 4            | 10       | 100       | 7   | 5                       | 60                            | 20                            | 150                            |
| 41        | FLT06   | 6            | 10       | 100       | 7   | 5                       | 60                            | 20                            | 150                            |
| 42        | FLT08   | 8            | 10       | 100       | 7   | 5                       | 60                            | 20                            | 150                            |
| 43        | FLT12   | 12           | 10       | 100       | 7   | 5                       | 60                            | 20                            | 150                            |
| 44        | FLT24   | 24           | 10       | 100       | 7   | 5                       | 60                            | 20                            | 150                            |
| 45        | HOPPERJET (W) - POLYPLEAT - 1 S/V                                   | 1            | 28       | 100       | 7   | 5                       | 90                            | 40                            | 400                            |
| 46        | HOPPERJET (W) - POLYPLEAT - 2 S/V                                   | 2            | 28       | 100       | 7   | 5                       | 90                            | 40                            | 400                            |
| 47        | HOPPERJET (T) - WITH POCKETS - 1 S/V                                | 1            | 28       | 210       | 7   | 5                       | 90                            | 40                            | 400                            |
| 48        | HOPPERJET (T) - WITH POCKETS - 2 S/V                                | 2            | 28       | 210       | 7   | 5                       | 90                            | 40                            | 400                            |
| 49        | INSERTABLE FOR NEGATIVE PRESSURE FPN/FPNX (T) WITH POCKETS - 6 S/V  | 6            | 56       | 210       | 7   | 5                       | 90                            | 20                            | 300                            |
| 50        | INSERTABLE FOR NEGATIVE PRESSURE FPN/FPNX (T) WITH POCKETS - 9 S/V  | 9            | 56       | 210       | 7   | 5                       | 90                            | 20                            | 300                            |
| 51        | INSERTABLE FOR NEGATIVE PRESSURE FPN/FPNX (T) WITH POCKETS - 12 S/V | 12           | 56       | 210       | 7   | 5                       | 90                            | 20                            | 300                            |

**4.0 FILCONTROL CONNECT**
**4.9 Advanced programming**
**4.9.1 Editable values**

To change any settable value of the electronic control board, press and hold the "ENTER" key for 5 seconds until "MAINT" is shown steady on the lower part of the display.

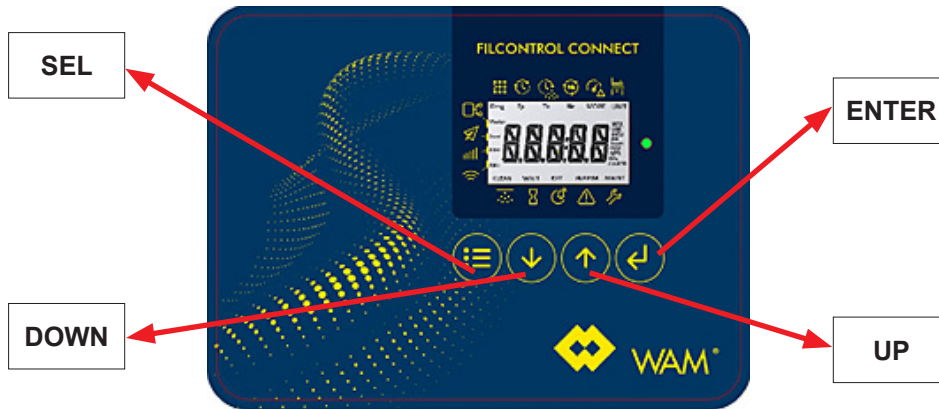
All editable values are listed below in the order shown on the display of the board:

| Programmable values  | Description   | Range                                     |                    | Default                           |
|--|---|---|--------------------|-----------------------------------|
|  |   | settable values                           | units              |                                   |
| <b>Program</b>   | <b>Section 4.8.4</b><br><b>Pre-set programs (page 30)</b>     | From 0 to 63                              | -                  | Depends on the machine type       |
| <b>Pause time</b>  | Parameters affected by modifications of the program           | From 0 to 250                             | s                  | According to the selected program |
| <b>Blowing Timing</b>  |   | from 5 to 400                             | ms                 | According to the selected program |
| <b>Number of cleaning cycles at the end of cycle</b>         |   | From 0 to 10                              | -                  | According to the selected program |
| <b>READ/ACTIVE/CALIBRATE</b>                                 |   | READ/ACTIVE/CALIBRATE                     | -                  | READ                              |
| <b>MDPE MIN</b>  |   | From 0 to 600                             | mmH <sub>2</sub> O | According to the selected program |
| <b>MDPE MAX</b>  |   | From 0 to 600                             | mmH <sub>2</sub> O | According to the selected program |
| <b>MDPE HIGH</b>   |   | From 0 to 600                             | mmH <sub>2</sub> O | According to the selected program |
| <b>UNIT</b>  |   | British Imperial System                   | Kpa and CFM        | -                                 |
|  | Metric system   | Nm <sup>3</sup> /h and mmH <sub>2</sub> O | -                  |                                   |
| <b>NOD: (indicates the RS485 MODBUS node)</b>                | accessible to the manufacturer only                           | 0;1;2;3                                   | -                  | NOD:33                            |
|  | Slave communication   | From 4 to 99                              | -                  |                                   |
| <b>PR: (indicates the protocol)</b>                          | RS485   | 0   | -                  | 0<br>(RS485)                      |
|  | Wi-Fi (Hotspot 192.168.2.1)                                   | 1   | -                  |                                   |
|  | Wi-Fi (Client DHCP! First configure your network)             | 2   | -                  |                                   |
|  | GPRS  | 3   | -                  |                                   |
| <b>BDR: (indicates the communication speed RS485 MODBUS)</b> | communication speed RS485 MODBUS                              | 0-9 between 1200 and 38400                | -                  | 9600                              |
| <b>S3: (indicates the external alarm input S3)</b>           | The system ignores S3   | 0   | -                  | 0<br>(the system ignores S3)      |
|  | The system uses the sensor S3 as normally open (JUMPER=ALARM) | 1   | -                  |                                   |
|  | The system uses the sensor S3 as normally closed (JUMPER=OK)  | 2   | -                  |                                   |












**4.9.2 Custom values**

In addition to the basic functions already described in the section **4.8.1 How to customise a program (page 25)**, all parameters given in the table **section 4.9.1 Editable values (page 32)** can be customised.

Proceeds as follows to change the programmable values:


**Important**

**Prior to starting the programming, disable the cleaning, i.e. the contact S2 key must be in open position.**

| ACTION   | INFORMATION SHOWN ON THE DISPLAY  |
|--|---|
| 1. Press and hold the "ENTER" key  for 5 seconds until "MAINT" is shown steady on the lower part of the display. It is shown the program which has been pre-set on the control board. |   |
| 2. Press the "SEL" key  to display the value to be changed (check the list given in the table at <b>page 32</b> in the column "programmable values").                                 |   |
| 3. Press the "ENTER" key  to change the selected parameter; the value will blink on the display.  |   |
| 4. Press the "UP" key  to change the value (consider the range associated to the table at <b>page 32</b> in the column "settable values").  |   |
| 5. Press the "ENTER" key  ; the value selected stops flashing.  |   |
| 6. Press the "SET" key  until the display shows the message "ABORT".  |  |
| 7. Press the "UP" key  until the display shows the message "SAVE".  |  |
| 8. Press the "ENTER" key  .   |   |
| ONLY at this point the value changing procedure is successfully completed.   |   |

### 4.9.3 End of cycle cleaning

The cleaning at the end of the cycle has the function of performing cleaning cycles with no reversed air flow, thus increasing the efficiency of the same. It activates when the contact S2 is opened after its closure, and, however, after all solenoid valves have been activated.



#### Important

**In all programs available, the pause time of the cleaning at the end of the cycle (between one blow and the next) is set to 5s and CANNOT be changed. Only the number of cycles can be set ( section 4.9.2 Custom values - page 33).**

**To be able to disable the cleaning at the end of the cycle, set the number of cycles for the final cleaning to 0 as described in section 4.9.2 Custom values ( page 33); in this way, when the contact S2 opens, the cleaning will continue up to the last solenoid valve; then the control board goes in stand-by.**

### 4.9.4 External signal S3

The external alarm S3 has the purpose to block the cleaning of the filter. It may be associated with any coherent sensor (in charge of the customer).

This alarm can be set according to the 3 modes:

- 0: The system ignores S3.
- 1: The system uses the sensor S3 as normally open (JUMPER=ALARM).
- 2: The system uses the sensor S3 as normally closed (JUMPER=OK).

In order to perform the above setting, select (by following the procedure given in the **section 4.9.2 Custom values (page 33)** the value of the parameter S3, depending on the need.

### 4.8.5 RS485 Communication

The MODBUS communication function of the FILCONTROL CONNECT allows the electronic control board to get interfaced with the PLC control systems through a universal protocol.

**Communication protocol: RS485, MODBUS 9600,8,N,1**

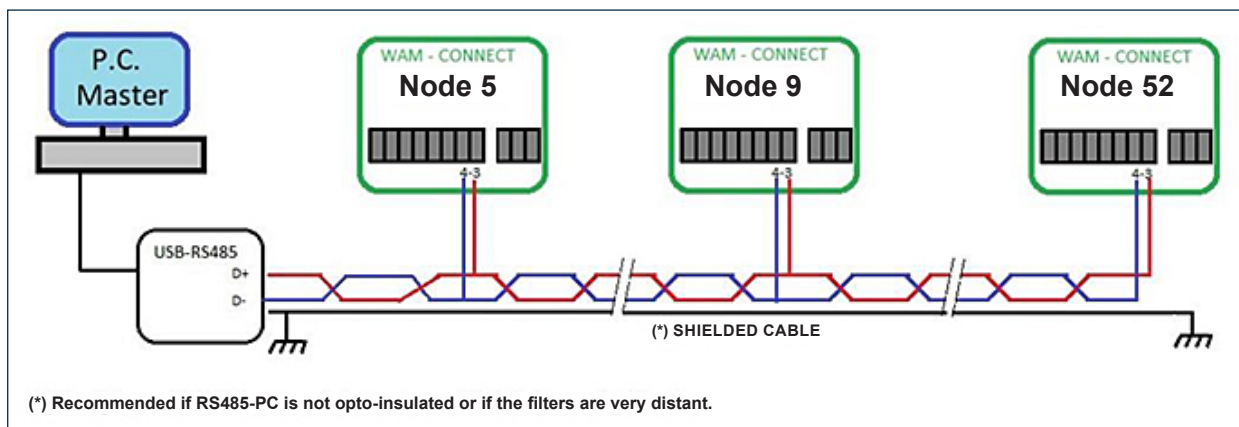
#### 4.9.5.1 Connection

The boards must be connected through the terminals 3 and 4 with twisted pair.

The interface on the filters is opto-insulated with insulation capacity of about 4KV.

Since it does not envisage repeaters management (only connection D+ and D-), the filters number and the distances are limited to one way only according to the MODBUS standard.

*Example of connection:*



**4.0 FILCONTROL CONNECT**
**4.9.5.2 Set-up - Conflicts with other options**

The priority of the Wi-Fi and GPRS can generate corrupted MODBUS due to the physical switching of the communication.

**N.B.:** As a consequence, if two protocols are used simultaneously, corrupted frames detecting algorithms must be provided.

- SetUp → **PR=0**

The filter only communicates in MODBUS mode (recommended).

- SetUp → **PR=1,2**

The filter communicates every 1 second with the Wi-Fi module, the MODBUS communication is still possible in the remaining time. Provision should be made in the network management for logics meant to recover lost messages sent by the filter due to the temporary management of the Wi-Fi module.

- Set-up → **PR=3,4**

Every 5 seconds the filter queries the GPRS module, then manages and/or sends messages to the phones; however, MODBUS communication is still possible in the remaining time. Provision should be made in the network management for logics meant to recover lost messages sent by the filter due to the temporary management of the GPRS module.

**4.9.5.3 Set-up - MODBUS Data Reading**

Function 3 MODBUS protocol:

|                    |                           |
|--------------------|---------------------------|
| 1 Byte             | Default "33" (See Set-up) |
| 1 Byte             | 3                         |
| 2 Byte (High, Low) | 0x0000 ... 0xFFFF         |
| 2 Byte (High, Low) | 0 ... 125                 |

Example of logs 1000 and 1001 request:

|              |                           |
|--------------|---------------------------|
| 1 Byte       | Default "33" (See Set-up) |
| 1 Byte       | 0x03                      |
| 1 Byte       | 2 * log                   |
| 2 Byte * log | Value Array               |

Example of logs 1000 and 1001 request:

|      |      |      |      |      |      |       |       |
|------|------|------|------|------|------|-------|-------|
| 0x11 | 0x03 | 0x03 | 0xE8 | 0x00 | 0x02 | Chk-H | Chk-H |
|------|------|------|------|------|------|-------|-------|

| Response      |              |                           |
|---------------|--------------|---------------------------|
| Slave Address | 1 Byte       | Default "33" (See Set-up) |
| Function Code | 1 Byte       | 0x03                      |
| Byte Count    | 1 Byte       | 2 * log                   |
| Log Value     | 2 Byte * log | Value Array               |

As a response to request for the logs 1000 and 1001:

|      |      |      |      |      |      |      |       |       |
|------|------|------|------|------|------|------|-------|-------|
| 0x11 | 0x03 | 0x04 | 0x12 | 0x34 | 0x56 | 0x78 | Chk-H | Chk-H |
|------|------|------|------|------|------|------|-------|-------|

**4.0 FILCONTROL CONNECT**
**List of readable logs**

| Address | Log                    | Meaning                                       |
|---------|------------------------|---|
| 1000    | Filter status          | Bit groups, see the following description     |
| 1001    | MDPE Reading           | 0...50 0,0KPa...5,0KPa                        |
| 1002    | Solenoid Valves Window | Bit 0....14 => EV1...EV15; 1=None             |
| 1003    | Program set            | 0...63 Program number                         |
| 1004    | Pause Time             | Each unit equals 1 Sec.                       |
| 1005    | Blowing time           | Each unit equals 10 mSec.                     |
| 1006    | WORK-TIME minutes      | Working timer, minutes with S2 active         |
| 1007    | WORK-TIME hours        | Working timer, hours with S2 active           |
| 1008    | SHOOT - LOW            | Number of blows performed 0....65536          |
| 1009    | SHOOT - HIGH           | Number of blows, each unit equals 65536 shots |

**Filter status log**

|  |  |  |    |    |    |    |   |    |    |   |    |   |   |   |   |
|--|--|--|----|----|----|----|---|----|----|---|----|---|---|---|---|
|  |  |  | Ev | Ev | Ev | Ev | - | WK | EX | W | S2 | M | M | F | F |
|--|--|--|----|----|----|----|---|----|----|---|----|---|---|---|---|

|            |  |
|------------|--|
| FF=00      | Filter in "Stand-By"                                 |
| FF=01      | Filter in "Clean"                                    |
| FF=10      | Filter in "End of Clean"                             |
| FF=11      | Filter in Alarm                                      |
| M=00       | MDPE value lower than the minimum                    |
| M=01       | MDPE normal value                                    |
| M=10       | MDPE high value                                      |
| M=11       | MDPE in alarm value                                  |
| S2=0,1     | Input S2, 1=active, 0=Not Active                     |
| W=0,1      | Input WAIT, 1=active, 0=Not Active                   |
| EX=0,1     | Input Ext (S3 or alarm), 1=active, 0=Not Active      |
| WK=0,1     | Output WK, 1=active, 0=Not Active                    |
| Ev=0....15 | Last solenoid valve that has blown, 0=StandBy, n=EVn |


**Danger - Warning**

If several filters are monitored by one PC, the nodes 0, 1, 2, 3 and 33 are reserved for specific functions, therefore they cannot be used.

Configure them on the other nodes; the node 33 can be configured on one filter only.

From the front panel of the FILCONTROL CONNECT select the nodes between 4 and 99 (except for 33, already configured).

## 4.10 Accessory modules (OPTION)

The FILCONTROL CONNECT electronics requires to fit 2 accessories for remote connection:

### (a) GPRS MODULE

The additional GPRS module allows to remotely display, both in automatic mode and upon request, the working parameters of the filter (operation hours, number of blows, pressure, filter status).

The communication is possible through a mobile phone and consists in displaying the STATUS, a REPORT or the EVENTS.

It is not possible to change the programming of the control board by using the GPRS module, but only requiring info.

### (b) Wi-Fi MODULE

The additional Wi-Fi module allows displaying remotely the operation parameters of the filter. It is possible to monitor all details available on the control board in INFO mode and *to program* all aspects visible on the control board in programming mode.

The communication is made in real time by mobile phone, PC or tablet.

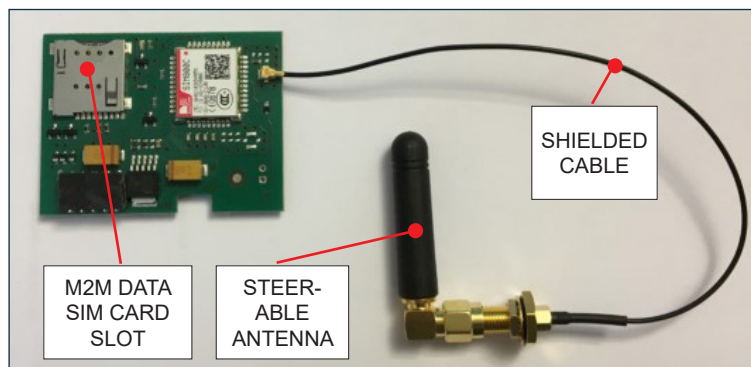


## Important

**The Wi-Fi or GPRS modules are alternative and cannot be mounted both on the control board.**

### 4.10.1 GPRS Module

The GPRS module can be supplied as an option at the time of the order or afterwards, but only for FILCONTROL CONNECT control boards.



The kit does not include the SIM card for M2M connectivity.

The customer can purchase the M2M SIM cards from a local dealer and fit it into the appropriate slot on the GPRS module.

**N.B.: Disable the PIN code before inserting the SIM card.**

#### 4.10.1.1 Activation

##### 4.10.1.1.1 Activation

The indications on the installation and activation of the GPRS module are given below.

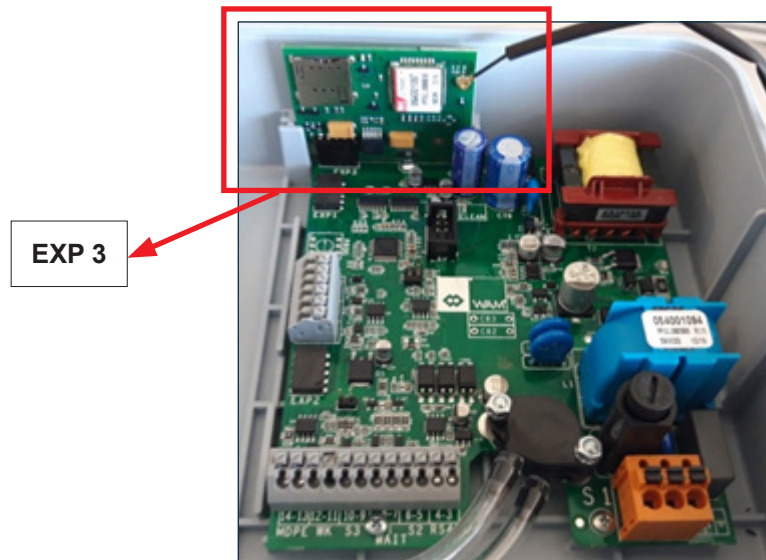
- 1) Disconnect the board from the main power supply.
- 2) Open the cover by unscrewing the 4 screws.
- 3) Disconnect the flat cable that connects the master card /touch keypad.

4.0 FILCONTROL CONNECT

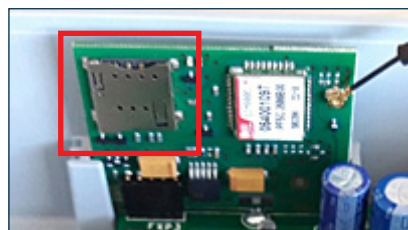
- 4) Check if the body is provided with the bore for the fastening of the antenna, otherwise, perform a hole having d=6.25 mm on the centre right side of the box.



- 5) Install the antenna shielded cable and secure the nut, checking to make sure the sealing is tight.  
6) Insert the GPRS module in the vertical guide, by centring the the pin for exp3 connection.



- 7) Fasten the steerable antenna by tightening the related nut.  
8) Insert the M2M-type SIM card (the SIM card pin has to be disabled).



- 9) Close the cover, connect the keypad flat power and communication cable.  
10) Power the electronic control board.

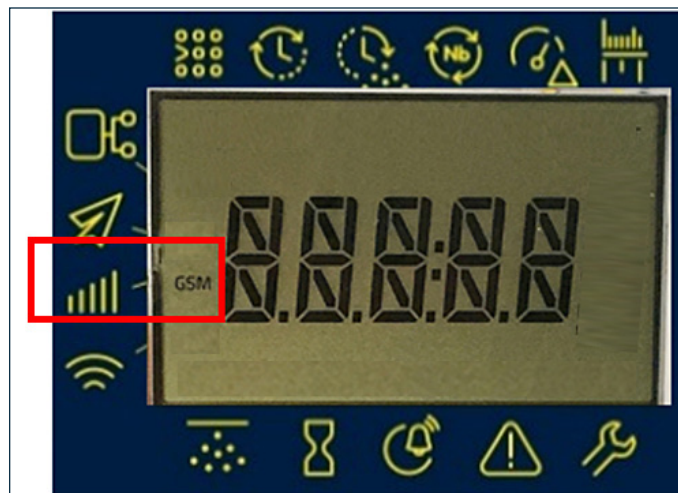
**4.0 FILCONTROL CONNECT**

11) Access the programming menu and set the parameter PR (protocol) on "3" (*Para.4.9.2 Custom values - page 33*).

12) Check if the LCD displays shows the message "GSM".

If the control board replays "INF00" when interrogated upon each start-up, the module has been configured correctly by the operator.

If the above message has not been sent, the connection to the GPRS module has not been properly performed and, as a result, the board does not acknowledges the module.



**NOTES:** (a) The control board envisages maximum 3 users.

(b) Replacing the GPRS module does not require changing the set-up.

(c) Replacing the MASTER board requires to reset the module through SMS.

#### 4.10.1.1.2 Connecting the Control Card to the Mobile Phone

1) STORE ON YOUR PHONE BOOK THE NUMBER OF SIM CARD INSERTED IN THE GPRS MODULE

2) Connect the GPRS MODULE TO THE MOBILE PHONE, by sending from the latter an SMS message with the following text:

**TE<sub>n</sub>.PW + country code assigned to the cell phone number**

where:

|           |  |
|-----------|--|
| <b>n</b>  | Number of the user:<br>User 1= "1"<br>User 2= "2"<br>User 3= "3"                         |
| <b>PW</b> | Default password for installation:<br>User 1= "1111"<br>User 2= "2222"<br>User 3= "3333" |

Example:

**TE1.1111+39347123456789**

**NOTE:** Used as standard E.164 that envisages maximum of 14 digits.

**4.0 FILCONTROL CONNECT**
**4.10.1.2 Monitoring**
**4.10.1.2.1 Changing the password**

After the first user registration, it is recommender to change the default user password.

To change your password, send the following SMS:

**PWn.oldPW.newPW.newPW**

where:

|              |  |
|--------------|--|
| <b>n</b>     | Number of the user:<br>User 1= "1"<br>User 2= "2"<br>User 3= "3"                         |
| <b>oldPW</b> | Default password for installation:<br>User 1= "1111"<br>User 2= "2222"<br>User 3= "3333" |
| <b>newPW</b> | New Password   |

Example:

**PW1.1111.Abs8.Abs8**

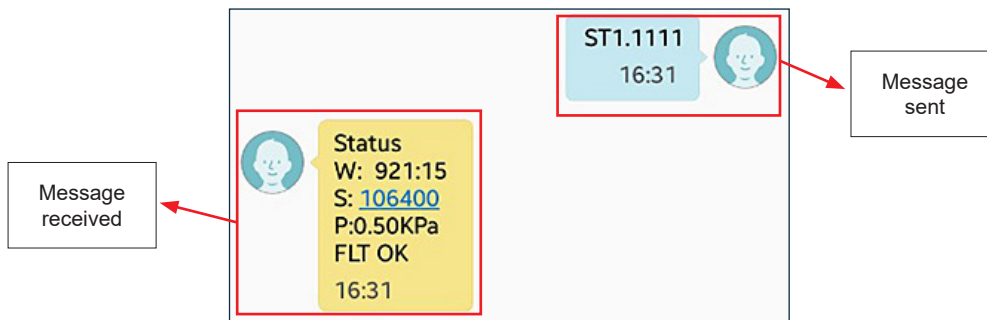
**4.10.1.2.2 GPRS status request**

It is possible to require the STATUS of your filter by sending a request via SMS using the command:

**STn.PW**

|           |  |
|-----------|--|
| <b>n</b>  | Number of the user:<br>User 1= "1"<br>User 2= "2"<br>User 3= "3" |
| <b>PW</b> | Password   |

After this command has been sent, the filter responds with the message below:



|            |  |
|------------|--|
| <b>W:</b>  | number of operation hours up to the time the message has been sent |
| <b>S:</b>  | number of blows performed  |
| <b>P:</b>  | Delta pressure P in mmH <sub>2</sub> O / KPa                       |
| <b>FLT</b> | Status of the filter → OK or alarm                                 |

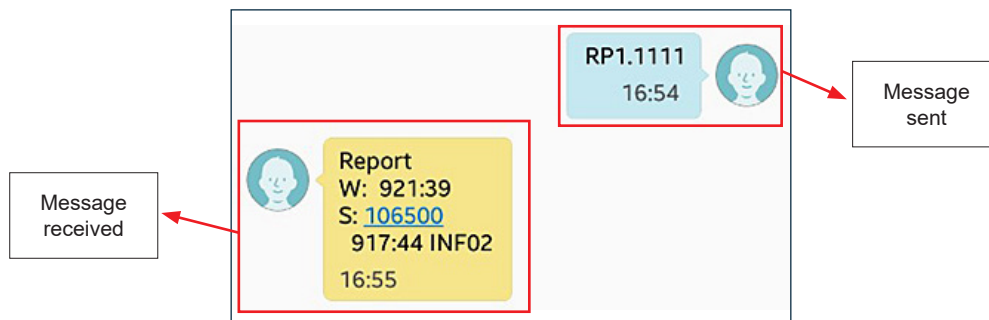
**4.0 FILCONTROL CONNECT**
**4.10.1.2.3 Request for reports on recent events**

It is possible to require the **REPORT** on recent events by sending a request via SMS using the command

**RPn.PW**

|           |  |
|-----------|--|
| <b>n</b>  | Number of the user:<br>User 1= "1"<br>User 2= "2"<br>User 3= "3" |
| <b>PW</b> | Password   |

After this command has been sent, the filter responds with the message below:



|  |  |
|--|--|
| <b>W:</b>  | number of operation hours up to the time the message has been sent |
| <b>S:</b>  | number of blows performed  |
| number of operation hours up to the time the last event has occurred | Event  |

To identify the nature of the event, check the **section 4.11.3 Errors/GPRS Info (page 48)**.

**4.10.1.2.4 How to manage the notifications**

To receive automatically reports or notifications on the events, assign to the user a notification mode. The command that allows you to manage the notifications is:

**MDn.PWt**

|           |  |
|-----------|--|
| <b>n</b>  | Number of the user:<br>User 1= "1"<br>User 2= "2"<br>User 3= "3" |
| <b>PW</b> | Password   |
| <b>t</b>  | Type of notification: between 0 and 7                            |

**4.0 FILCONTROL CONNECT**

The types of notification "t" available are:

| Notification ID | Description                                 |
|-----------------|---|
| 0               | No Notification                             |
| 1               | Report every 40 operation hours             |
| 2               | Report every 160 operation hours            |
| 3               | Report every 320 operation hours            |
| 4               | Events notification                         |
| 5               | Report every 40 operation hours and Events  |
| 6               | Report every 160 operation hours and Events |
| 7               | Report every 320 operation hours and Events |

The logics provide that when it is entered a value "T" from 1 to 3, a report is sent (**section 4.10.1.2.3 Request for reports on recent events - page 41**) every xxx operation hours (check the table above). When it is entered a value "t" from 5 to 7, the control board sends always a report (**section 4.10.1.2.3 Request for reports on recent events - page 41**) every xxx operation hours (check the table above); furthermore, it is sent an automatic message for each event occurred.

For instance:



|  |  |
|--|--|
| <b>W:</b>  | number of operation hours up to the time the message has been sent |
| <b>S:</b>  | number of blows performed at the time of the event                 |
| <b>P:</b>  | $\Delta p$ at the time of the event                                |
| number of operation hours up to the time the last event has occurred | Event  |

To identify the nature of the event, check the **section 4.11.3 Errors/GPRS Info (page 48)**.

#### 4.10.2 Wi-Fi Module



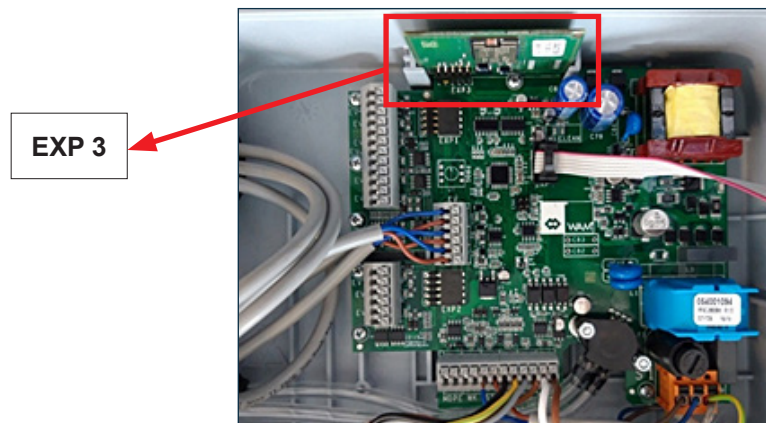
#### Important

To use the Wi-Fi module, select the protocol 1 or 2, depending on whether the connection is via Hot-spot 192.168.2.1 or with DHCP Client!

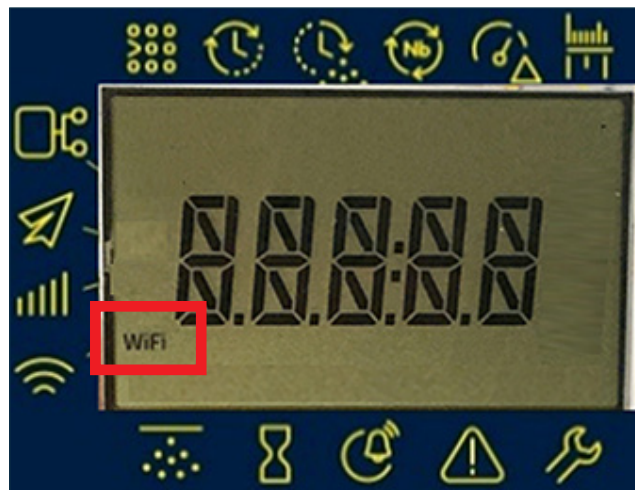
First, configure your network.

To modify it, use the procedure given in the section 4.9.2 Custom values (page 33).

The module is inserted in the control board in the position indicated in the image:



Once the protocol has been changed to 1 or 2 depending on the need, the Wi-Fi module has been recognised by the control board if the display shows Wi-Fi:



If connected to an option Wi-Fi expansion, the control board sends at regular intervals to the Wi-Fi module the filter status or other information to refresh the Web-Server.



#### Important

If the operator has not set the correct protocol, the web pages will be empty.

**4.0 FILCONTROL CONNECT**
**4.10.2.1 HOT-SPOT operation (default)**

The module allows Wi-Fi communication between a smartphone, tablet or PC with the electronic board of the filter and makes it possible to:

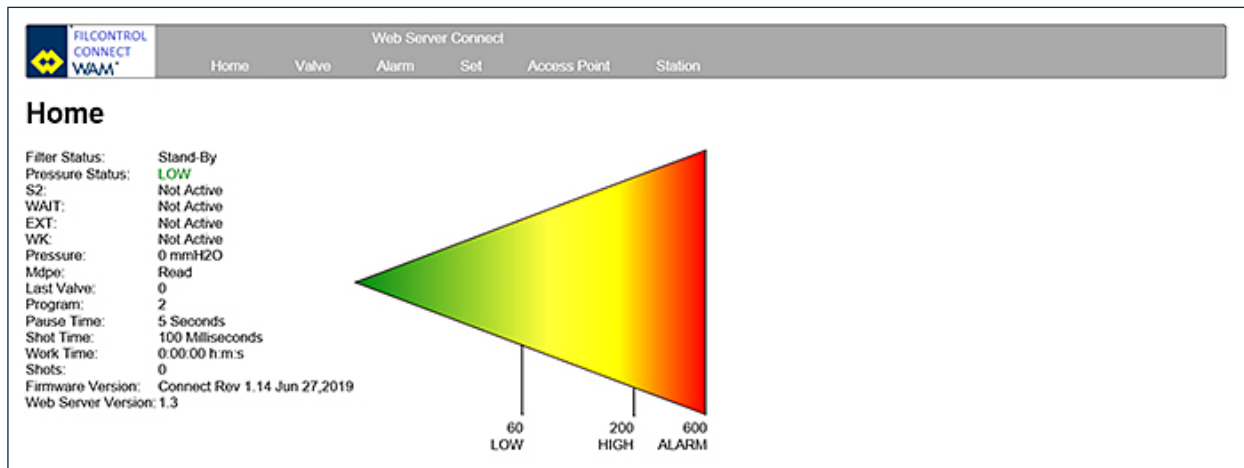
- **check the filter status;**
- **edit the operating parameters;**
- **check the events log.**

The module creates a network named 'WAM\_CONNECT\_#####'; the "#" stands for the MAC ADDRESS.

If multiple filters are installed, this allows interrogating each filter independently.

To get connected to the module using your smartphone, tablet or PC, access the set-up of the Wi-Fi and get connected to the network of the filter of interest.

Then open any Internet browser, type the IP address **192.168.2.1** and access the home page of the **web-server**.


**4.10.2.2 WEB page: Home**

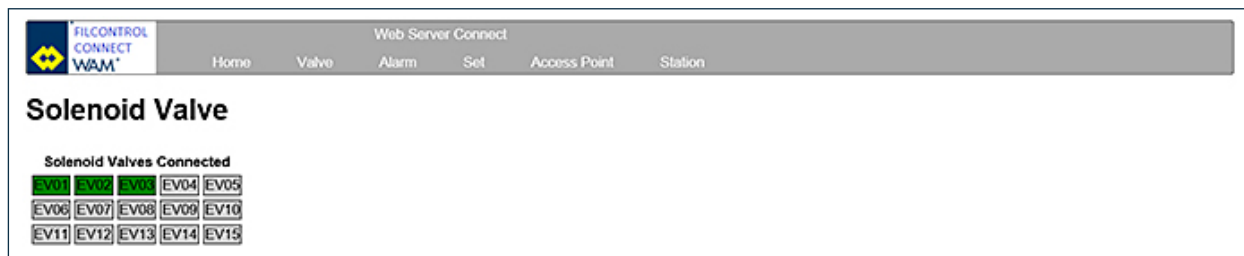
- a) The "Filter Status" field displays:
  - "Clean" during cleaning;
  - "Stand-by" and "Alarm" when the filter operation has been blocked and is not performing the cleaning.
- b) The "MDPE" field shows respectively the pressure in the format set by the user and the current status (low, normal, high, alarm).
- c) The fields "S2", "WAIT", "EXT" can be "Active" or "Not Active", depending on the physical status of the related inputs.
- d) The "WK" field is "Active" if the filter is in alarm, otherwise it stays "Not Active".
- e) The "Pressure" field displays the differential pressure value measured between the unclean and the clean area of the filter.
- f) The "Last Valve" field indicates the ID of the last solenoid valve which has performed a blow, if the status of the filter is "clean".
- g) The "Program", "Pause Time" and "Blow Time" fields show the selected program, with pause and blowing timing.
- h) The "Work Time" fields represent the operation hours counters and indicate, respectively, how many hours and minutes the input "S2" and the filter cleaning have been active, and how many blows have been actually performed.
- i) The "Firmware Version" field indicates the firmware version installed on the board.
- j) The "Web Server Version" field indicates the firmware version installed on the Wi-Fi module.

#### 4.10.2.3 WEB page: Valve

This window shows (green coloured) the solenoid valves that have been identified by the board and grey coloured, those not connected. This map is used to identify the physical address of the solenoid valves in the system.

- from EV01 to EV03 they are connected on the master card;
- from EV04 to EV09 they are connected on the first expansion (option);
- from EV10 to EV15 they are connected on the second expansion (option).

Moreover, if the master board controls the connected boards, the status shown is "Slave"



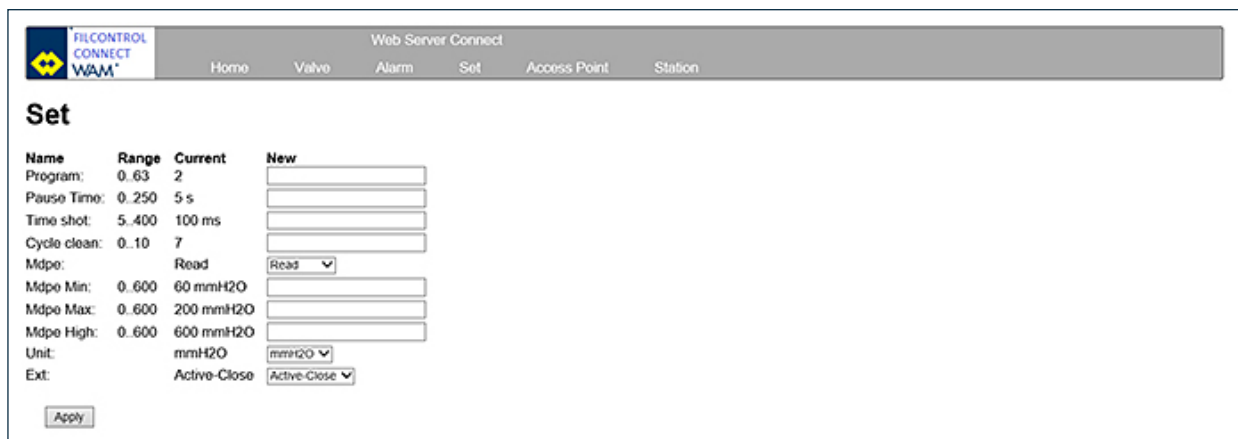
**4.0 FILCONTROL CONNECT**
**4.10.2.4 WEB page: Set**

This window allows displaying the filter set-up and permits the operator to modify the cleaning and operation parameters.

- The first column represents the parameter name.
- The second column represents the validity range.
- The third column lists the current value.
- The column with the boxes allows you to enter the new values according to the range column.

These parameters are extensively described in the previous paragraph.

Use the key "Apply" to send the updated values to the FILCONTROL CONNECT board with Wi-Fi Module.



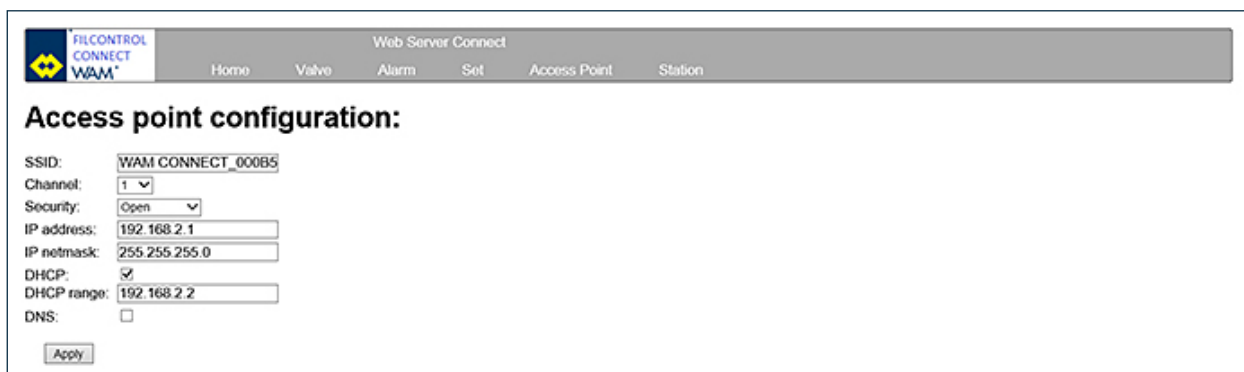
| Name         | Range | Current      | New                  |
|--------------|-------|--------------|----------------------|
| Program:     | 0.63  | 2            | <input type="text"/> |
| Pause Time:  | 0.250 | 5 s          | <input type="text"/> |
| Time shot:   | 5.400 | 100 ms       | <input type="text"/> |
| Cycle clean: | 0.10  | 7            | <input type="text"/> |
| Mdpe:        |       | Read         | <input type="text"/> |
| Mdpe Min:    | 0.600 | 60 mmH2O     | <input type="text"/> |
| Mdpe Max:    | 0.600 | 200 mmH2O    | <input type="text"/> |
| Mdpe High:   | 0.600 | 600 mmH2O    | <input type="text"/> |
| Unit:        |       | mmH2O        | <input type="text"/> |
| Ext:         |       | Active-Close | <input type="text"/> |

**4.10.2.5 WEB page: Access Point**

This window displays the Wi-Fi configuration.

The SSID is the network name created by the filter; other fields contain the configurations of the ACCESS POINT:

- default Web-Server 192.168.2.1
- default MASK 255.255.255.0
- default 1 channel with DHCP 192.168.2.2



**Access point configuration:**

SSID:

Channel:

Security:

IP address:

IP netmask:

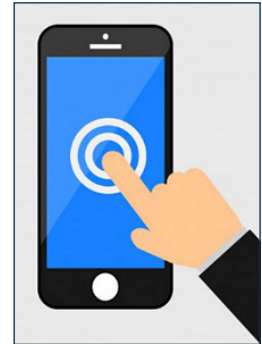
DHCP:

DHCP range:

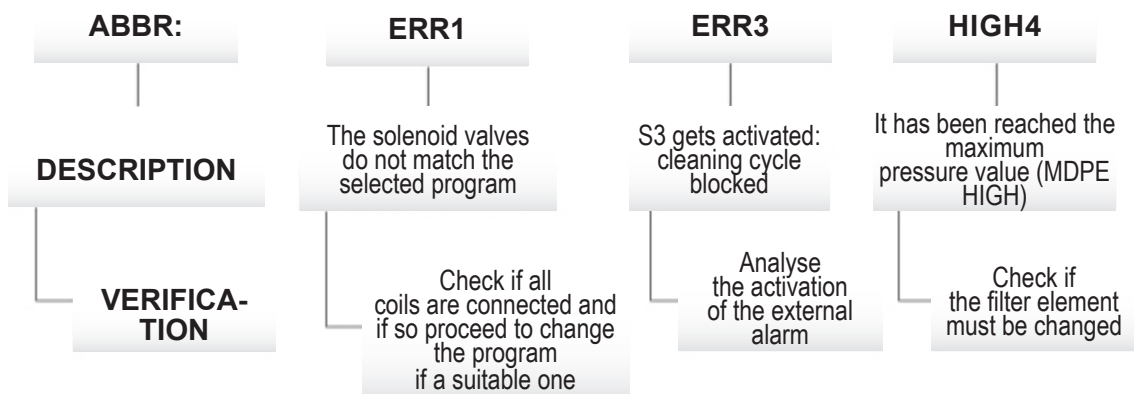
DNS:

**4.0 FILCONTROL CONNECT**
**For Android**

1. Access the "Settings";
2. Select "Wi-Fi".
3. If not active → enable the "Wi-Fi" function.
4. Wait for the device to show all available networks.
5. Select "WAM\_CONNECT\_#####"
  - 6. Wait for the message "Connected without the Internet" to be displayed.
  - 7. Close the settings page.
  - 8. To display it, access Google or open in any browser **192.168.2.1**
  - 9. Wait for the browser to open the HOME PAGE of the filter.


**4.11 Errors Log/Info**
**4.11.1 Errors shown on the display**

The errors/info shown on the display of the control board are the following:



The WK output is a general alarm which trips when at least one of the previous alarms ERR1 ERR3 o HIGH4 has tripped. When active, the caption "ALARM" is shown on the display.


**Important**

If one of the above mentioned alarms trips, the display shows the caption "ALARM"; to check the nature of the alarm, enter the "INFO" mode by pressing and holding for 5 seconds the key



"SEL" , then again the "SEL" key ; if alarms are active, it is shown the associated error code.

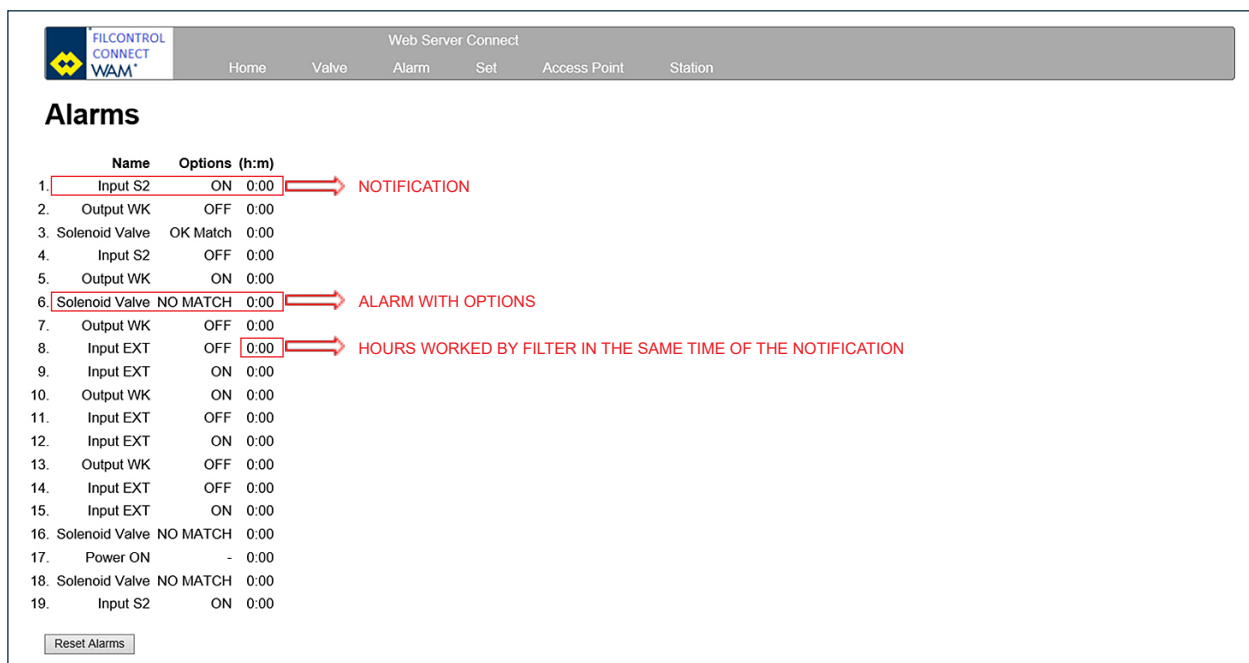
**4.11.2 Wi-Fi Errors/Info**

To display remotely the errors, access the page "ALARMS":

This window displays the last 20 events recorded:

- Power-on → whenever the filter is powered it is recorded a change of status;
- Electrovalve NO-MACTH → in case the setting of the filter does not match the number of solenoid valves identified;
- Inputs S2, S3 → it is recorded any status change;
- WK Alarm Output → it is recorded any status change;
- MDPE Sensor → any of the 4 available statuses (low, norm., high, alarm) change is recorded;
- Change SET-UP → if modified by an operator:

**N.B.:** Use the "Reset alarm" key to clear the events log.

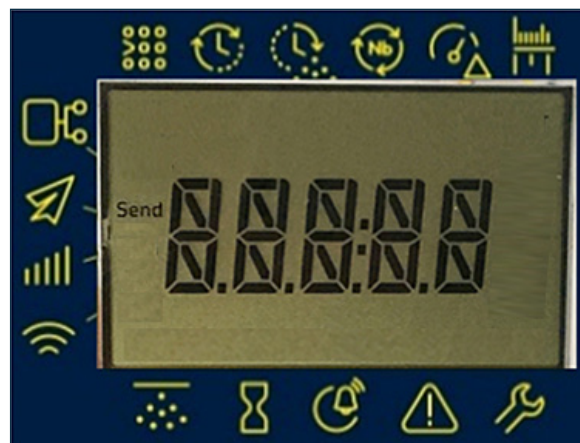


|     | Name           | Options  | (h:m) |   |
|-----|----------------|----------|-------|---|
| 1.  | Input S2       | ON       | 0:00  | → NOTIFICATION  |
| 2.  | Output WK      | OFF      | 0:00  |   |
| 3.  | Solenoid Valve | OK Match | 0:00  |   |
| 4.  | Input S2       | OFF      | 0:00  |   |
| 5.  | Output WK      | ON       | 0:00  |   |
| 6.  | Solenoid Valve | NO MATCH | 0:00  | → ALARM WITH OPTIONS  |
| 7.  | Output WK      | OFF      | 0:00  |   |
| 8.  | Input EXT      | OFF      | 0:00  | → HOURS WORKED BY FILTER IN THE SAME TIME OF THE NOTIFICATION |
| 9.  | Input EXT      | ON       | 0:00  |   |
| 10. | Output WK      | ON       | 0:00  |   |
| 11. | Input EXT      | OFF      | 0:00  |   |
| 12. | Input EXT      | ON       | 0:00  |   |
| 13. | Output WK      | OFF      | 0:00  |   |
| 14. | Input EXT      | OFF      | 0:00  |   |
| 15. | Input EXT      | ON       | 0:00  |   |
| 16. | Solenoid Valve | NO MATCH | 0:00  |   |
| 17. | Power ON       | -        | 0:00  |   |
| 18. | Solenoid Valve | NO MATCH | 0:00  |   |
| 19. | Input S2       | ON       | 0:00  |   |

Reset Alarms

**4.11.3 GPRS Errors/Info**

As soon as the message is sent, the display shows the caption "Send":





4.0 FILCONTROL CONNECT

| CODE  | DEFINITION    | MESSAGE RECEIVED THROUGH SMS |
|-------|---------------|------------------------------|
| 00    | Power On      | HH:MM Pwr Up                 |
| 01    | EV-Match      | HH:MM ELV OK                 |
| 11    | EV-NoMatch    | HH:MM ELV Err                |
| 02    | S2-Enable     | HH:MM S2 ON                  |
| 12    | S2-Disable    | HH:MM S2 OFF                 |
| 03    | S3-OK         | HH:MM EXT OFF                |
| 13    | S3-Alarm      | HH:MM EXT ON                 |
| 04    | MDPE OK       | HH:MM MDPE OK                |
| 14    | MDPE-ZERO     | HH:MM MDPE LOW               |
| 24    | MDPE HIGH     | HH:MM MDPE HIGH              |
| 34    | MDPE-FAULT    | HH:MM MDPE ALARM             |
| 05    | Display-OK    | HH:MM DSY OK                 |
| 15    | Display-Fault | HH:MM DSY ALARM              |
| 07    | Set-Up        | HH:MM CHG SetUp              |
| 18    | GPRS-User1    | HH:MM CHG USER               |
| 28    | GPRS-User2    |                              |
| 38    | GPRS-User3    |                              |
| 09    | GPRS-OK       | HH:MM GPRS OK                |
| 19    | GPRS-Fault    | HH:MM GPRS ERR               |
| Other | UNDEF         | HH:MM ???                    |

\* HH:MM = ONLY THE ACTUAL OPERATION HOURS

A1 Declaration of Incorporation



CE DECLARATION OF CONFORMITY

The manufacturer:

**WAMGROUP S.p.A.**

located in

Strada degli Schiocchi, 12 - I-41124 Modena- Italy

**under its own responsibility declares that:**

FILCONTROL Electronic Control Board

**complies with the requirements imposed by the following Directives:**

**Directive 2014/30/CE** of the European Parliament and the Council of 26 February 2014 on the harmonisation of the laws of the Member States relating to electromagnetic compatibility;

**Directive 2014/35/CE** of the European Parliament and the Council of 26 February 2014 on the harmonisation of the laws of the Member States relating to the making available on the market of electrical equipment designed for use within certain voltage limits.

**Harmonized standards, national standards and technical regulations in question:**

UNI EN ISO 12100: 2010 ; CEI EN 60204 – 1

**It is forbidden to operate all these products before the machine, in which they will be installed, is declared in conformity with 2006/42/EC AND SUBSEQUENT AMENDMENTS**

**They also comply with the Directive 2014/34/EU of 26 February 2014 (ATEX)**

**CE Ex** II 3D Ex tc IIIC T100 °C Dc X

EN 60079-31: 2014

Ambient temperature -20°C / +60°C

The signing company is committed to provide, in response to a reasoned request by national authorities, relevant information on products covered by this declaration, without prejudice to the rights of intellectual property of the manufacturer. The information will be transmitted directly to the national authorities having requested.

Strada degli Schiocchi, 12 - I-41124 Modena- Italy, 01/07/2016

The person authorized to provide  
the technical documentation  
Vainer Marchesini



The legal representative:

Vainer Marchesini



WAMGROUP S.p.A. - Strada degli Schiocchi, 12 - I-41124 Modena- Italy

**GRAPHIC PACKAGING INTERNATIONAL -- TEXARKANA MILL**

**Title V Periodic Monitoring -- Visible Emissions Observations**

Report is for What Quarter? 1st quarter 2025

Print Name of Observer Kattu Deen Norman Signature [Signature]

**Weather:**

| Source Name                                      | Ch. 111 or Air Permit Limit | Method 9 or Zero Emissions ? | Date of Observation | Time of Day |
|--|-----------------------------|------------------------------|---------------------|-------------|
| Lime System Baghouse No. 1                       | 20%                         | 0                            | 1/7/25              | 11:20       |
| Lime System Baghouse No. 2                       | 20%                         | 0                            | 1/7/25              | 11:43       |
| #5 Extruder Vents -- A & B dies and post treater | 20%                         | method 9                     | 1/7/25              | 12:05       |
| #7 Extruder Vent on poly hopper                  | 5%                          | 0                            | 1/7/25              | 12:10       |
| #7 Extruder Vents -- A & B dies and post treater | 20%                         | 0                            | 1/7/25              | 12:14       |
| NCG incinerator                                  | 20%                         | sample with p3               | 1/7/25              | 10:45       |
| Starch Silo #1-TNK 0115                          | 20%                         | 0                            | 1/7/25              | 11:22       |
| Starch Silo #2-TNK 0116                          | 20%                         | 0                            | 1/7/25              | 11:23       |
| Starch Silo #3-TNK 0175                          | 20%                         | 0                            | 1/7/25              | 11:26       |
| #1 Cooling Tower                                 | 30%                         | 0                            | 1/8/25              | 12:01       |
| #2 Cooling Tower                                 | 30%                         | 0                            | 1/8/25              | 12:03       |
| #6 Chiller Cooling Tower                         | 30%                         | 0                            | 1/8/25              | 12:05       |
| Starch dust vent fan- chem. Furn                 | 5%                          | 0                            | 1/7/25              | 11:26       |
| FIREPMP1 (north) engine                          | 20%                         | 0                            | 1/24/25             | 7:35        |
| FIREPMP4 (south) engine                          | 20%                         | 0                            | 1/24/25             | 7:37        |
| #1 Lime Kiln diesel engine                       | 20%                         | 0                            | 1/8/25              | 12:05       |
| #2 Lime Kiln diesel engine                       | 20%                         | 0                            | 1/7/25              | 11:39       |
| Water plant emerg. engine                        | 20%                         | 0                            | 3/21/2025           | 12:48       |

\*\* Zero Emissions, denoted by "0%", means the source was observed by an IP employee and the source had zero visible emissions. Therefore, a Method 9 test was not required.

NOTE : The observer certifies by signing, that each observation was made more than 15 ft. away from the source, but no more than 0.25 miles away, that the sun was not in the observer's eyes, and where a vapor plume was present, the observation was made past the point where the plume was visible. Also, that the information is true and accurate the the best of their knowledge.

**GRAPHIC PACKAGING INTERNATIONAL -- TEXARKANA MILL**

**Title V Periodic Monitoring -- Visible Emissions Observations**

Report is for What Quarter? BQ4-2024

Print Name of Observer Walter Palmer

Signature [Signature]

Weather: Cloudy

| Source Name                                      | Ch. 111 or Air Permit Limit | Method 9 or Zero Emissions ? | Date of Observation | Time of Day |
|--|-----------------------------|------------------------------|---------------------|-------------|
| Lime System Baghouse No. 1                       | 20%                         | 0                            | 10/25/24            | 9:30        |
| Lime System Baghouse No. 2                       | 20%                         | 0                            | 10/25/24            | 9:32        |
| #5 Extruder Vents -- A & B dies and post treater | 20%                         | method 9                     | 10/25/24            | 10:30       |
| #7 Extruder Vent on poly hopper                  | 5%                          | 0                            | 10/25/24            | 30:35       |
| #7 Extruder Vents -- A & B dies and post treater | 20%                         | 0                            | 10/25/24            | 10:37       |
| NCG incinerator                                  | 20%                         | 0                            | 10/25/24            | 9:20        |
| Starch Silo #1-TNK 0115                          | 20%                         | 0                            | 10/25/24            | 9:35        |
| Starch Silo #2-TNK 0116                          | 20%                         | 0                            | 10/25/24            | 9:36        |
| Starch Silo #3-TNK 0175                          | 20%                         | 0                            | 10/25/24            | 9:37        |
| #1 Cooling Tower                                 | 30%                         | 0                            | 10/25/24            | 10:22       |
| #2 Cooling Tower                                 | 30%                         | 0                            | 10/25/24            | 10:21       |
| #6 Chiller Cooling Tower                         | 30%                         | 0                            | 10/25/24            | 10:20       |
| Starch dust vent fan- chem. Furn                 | 5%                          | 0                            | 10/25/24            | 9:38        |
| FIREPMP1 (north) engine                          | 20%                         | 0                            | 11/1/24             | 9:27        |
| FIREPMP4 (south) engine                          | 20%                         | 0                            | 11/1/24             | 8:21        |
| #1 Lime Kiln diesel engine                       | 20%                         | 0                            | 10/25/24            | 9:43        |
| #2 Lime Kiln diesel engine                       | 20%                         | 0                            | 10/25/24            | 9:47        |
| Water plant emerg. engine                        | 20%                         | Out of service               |                     |             |

\*\* Zero Emissions, denoted by "0%", means the source was observed by an IP employee and the source had zero visible emissions. Therefore, a Method 9 test was not required.

NOTE : The observer certifies by signing, that each observation was made more than 15 ft. away from the source, but no more than 0.25 miles away, that the sun was not in the observer's eyes, and where a vapor plume was present, the observation was made past the point where the plume was visible. Also, that the information is true and accurate the the best of their knowledge.

**GRAPHIC PACKAGING INTERNATIONAL -- TEXARKANA MILL**

Title V Periodic Monitoring -- Visible Emissions Observations

Report is for What Quarter? Q3 2024

Print Name of Observer J.T. Fussell

Signature John Fussell

Weather: Clear, blue skies

| Source Name                                      | Ch. 111 or Air Permit Limit | Method 9 or Zero Emissions ? | Date of Observation | Time of Day |
|--|-----------------------------|------------------------------|---------------------|-------------|
| Lime System Baghouse No. 1                       | 20%                         | 0                            | 8-9-24              | 13:14       |
| Lime System Baghouse No. 2                       | 20%                         | 0                            | 8-9-24              | 13:15       |
| #5 Extruder Vents -- A & B dies and post treater | 20%                         | Method 9                     |                     |             |
| #7 Extruder Vent on poly hopper                  | 5%                          | 0                            | 8-9-24              | 13:42       |
| #7 Extruder Vents -- A & B dies and post treater | 20%                         | 0                            | 8-9-24              | 13:41       |
| NCG incinerator                                  | 20%                         | Comingled with PPOZ          | 8-9-24              | 13:03       |
| Starch Silo #1-TNK 0115                          | 20%                         | 0                            | 8-9-24              | 13:07       |
| Starch Silo #2-TNK 0116                          | 20%                         | 0                            | 8-9-24              | 13:08       |
| Starch Silo #3-TNK 0175                          | 20%                         | 0                            | 8-9-24              | 13:09       |
| #1 Cooling Tower                                 | 30%                         | 0                            | 8-9-24              | 13:28       |
| #2 Cooling Tower                                 | 30%                         | 0                            | 8-9-24              | 13:29       |
| #6 Chiller Cooling Tower                         | 30%                         | 0                            | 8-9-24              | 13:31       |
| Starch dust vent fan- chem. Furn                 | 5%                          | 0                            | 8-9-24              | 13:12       |
| FIREPMP1 (north) engine                          | 20%                         | 0                            | 9/20/24             | 8:35        |
| FIREPMP4 (south) engine                          | 20%                         | 0                            | 9/20/24             | 8:37        |
| #1 Lime Kiln diesel engine                       | 20%                         | 0                            | 9/17/24             | 10:25       |
| #2 Lime Kiln diesel engine                       | 20%                         | 0                            | 9/17/24             | 10:35       |
| Water plant emerg. engine                        | 20%                         | out of service               |                     |             |

\*\* Zero Emissions, denoted by "0%", means the source was observed by an IP employee and the source had zero visible emissions. Therefore, a Method 9 test was not required.

NOTE : The observer certifies by signing, that each observation was made more than 15 ft. away from the source, but no more than 0.25 miles away, that the sun was not in the observer's eyes, and where a vapor plume was present, the observation was made past the point where the plume was visible. Also, that the information is true and accurate the the best of their knowledge.

**GRAPHIC PACKAGING INTERNATIONAL -- TEXARKANA MILL**

**Title V Periodic Monitoring -- Visible Emissions Observations**

Report is for What Quarter? Q2 2024

Print Name of Observer J.T. FUSSELL

Signature John Fumell

**Weather:**

| Source Name                                      | Ch. 111 or Air Permit Limit | Method 9 or Zero Emissions ? | Date of Observation | Time of Day |
|--|-----------------------------|------------------------------|---------------------|-------------|
| Lime System Baghouse No. 1                       | 20%                         | 0                            | 4-18-24             | 14:38       |
| Lime System Baghouse No. 2                       | 20%                         | 0                            | 4-18-24             | 14:40       |
| #5 Extruder Vents -- A & B dies and post treater | 20%                         | Method 9                     |                     |             |
| #7 Extruder Vent on poly hopper                  | 5%                          | 0                            | 4-18-24             | 15:16       |
| #7 Extruder Vents -- A & B dies and post treater | 20%                         | 0                            | 4-18-24             | 15:20       |
| NCG incinerator                                  | 20%                         | Comingle w/ B02              | 4-18-24             | 14:25       |
| Starch Silo #1-TNK 0115                          | 20%                         | 0                            | 4-18-24             | 14:32       |
| Starch Silo #2-TNK 0116                          | 20%                         | 0                            | 4-18-24             | 14:33       |
| Starch Silo #3-TNK 0175                          | 20%                         | 0                            | 4-18-24             | 14:34       |
| #1 Cooling Tower                                 | 30%                         | 0                            | 4-18-24             | 15:00       |
| #2 Cooling Tower                                 | 30%                         | 0                            | 4-18-24             | 15:02       |
| #6 Chiller Cooling Tower                         | 30%                         | 0                            | 4-18-24             | 15:10       |
| Starch dust vent fan- chem. Furn                 | 5%                          | 0                            | 4-18-24             | 14:36       |
| FIREPMP1 (north) engine                          | 20%                         | 0                            | 6-10-24             | 08:05       |
| FIREPMP4 (south) engine                          | 20%                         | 0                            | 6-10-24             | 08:10       |
| #1 Lime Kiln diesel engine                       | 20%                         | 0                            | 4-18-24             | 14:54       |
| #2 Lime Kiln diesel engine                       | 20%                         | 0                            | 4-18-24             | 14:50       |
| Water plant emerg. engine                        | 20%                         | Not started this quarter     |                     |             |

\*\* Zero Emissions, denoted by "0%", means the source was observed by an IP employee and the source had zero visible emissions. Therefore, a Method 9 test was not required.

NOTE : The observer certifies by signing, that each observation was made more than 15 ft. away from the source, but no more than 0.25 miles away, that the sun was not in the observer's eyes, and where a vapor plume was present, the observation was made past the point where the plume was visible. Also, that the information is true and accurate the the best of their knowledge.

**GRAPHIC PACKAGING INTERNATIONAL -- TEXARKANA MILL**

**Title V Periodic Monitoring -- Visible Emissions Observations**

Report is for What Quarter? Q1 2024

Print Name of Observer J.T. Fussell

Signature John Fussell

**Weather:**

| Source Name                                      | Ch. 111 or Air Permit Limit | Method 9 or Zero Emissions ? | Date of Observation | Time of Day |
|--|-----------------------------|------------------------------|---------------------|-------------|
| Lime System Baghouse No. 1                       | 20%                         | 0                            | 2-14-24             | 10:00       |
| Lime System Baghouse No. 2                       | 20%                         | 0                            | 2-14-24             | 10:04       |
| #5 Extruder Vents -- A & B dies and post treater | 20%                         |                              |                     |             |
| #7 Extruder Vent on poly hopper                  | 5%                          | 0                            | 2-14-24             | 10:18       |
| #7 Extruder Vents -- A & B dies and post treater | 20%                         | 0                            | 2-14-24             | 10:25       |
| NCG incinerator                                  | 20%                         | compliance with PSD          | 2-14-24             | 09:50       |
| Starch Silo #1-TNK 0115                          | 20%                         | 0                            | 2-14-24             | 09:52       |
| Starch Silo #2-TNK 0116                          | 20%                         | 0                            | 2-14-24             | 09:53       |
| Starch Silo #3-TNK 0175                          | 20%                         | 0                            | 2-14-24             | 09:54       |
| #1 Cooling Tower                                 | 30%                         | 0                            | 2-14-24             | 10:08       |
| #2 Cooling Tower                                 | 30%                         | 0                            | 2-14-24             | 10:10       |
| #6 Chiller Cooling Tower                         | 30%                         | 0                            | 2-14-24             | 10:12       |
| Starch dust vent fan- chem. Furn                 | 5%                          | 0                            | 2-14-24             | 09:56       |
| FIREPMP1 (north) engine                          | 20%                         | 0                            | 3-1-24              | 07:20       |
| FIREPMP4 (south) engine                          | 20%                         | 0                            | 3-1-24              | 07:24       |
| #1 Lime Kiln diesel engine                       | 20%                         | 0                            | 2-26-24             | 13:27       |
| #2 Lime Kiln diesel engine                       | 20%                         | 0                            | 2-22-24             | 10:05       |
| Water plant emerg. engine                        | 20%                         | out of service               | 2-14-24             | —           |

\*\* Zero Emissions, denoted by "0%", means the source was observed by an IP employee and the source had zero visible emissions. Therefore, a Method 9 test was not required.

NOTE : The observer certifies by signing, that each observation was made more than 15 ft. away from the source, but no more than 0.25 miles away, that the sun was not in the observer's eyes, and where a vapor plume was present, the observation was made past the point where the plume was visible. Also, that the information is true and accurate the the best of their knowledge.

**GRAPHIC PACKAGING INTERNATIONAL -- TEXARKANA MILL**

**Title V Periodic Monitoring -- Visible Emissions Observations**

Report is for What Quarter? Q4 2023

Print Name of Observer J. I. Fussell

Signature John Fussell

Weather: Partly Cloudy Wind South out of east

| Source Name                                      | Ch. 111 or Air Permit Limit | Method 9 or Zero Emissions ? | Date of Observation | Time of Day |
|--|-----------------------------|------------------------------|---------------------|-------------|
| Lime System Baghouse No. 1                       | 20%                         | 0                            | 11-13-23            | 14:32       |
| Lime System Baghouse No. 2                       | 20%                         | 0                            | 11-13-23            | 14:34       |
| #5 Extruder Vents -- A & B dies and post treater | 20%                         | Method 9                     |                     |             |
| #7 Extruder Vent on poly hopper                  | 5%                          | 0                            | 11-13-23            | 14:55       |
| #7 Extruder Vents -- A & B dies and post treater | 20%                         | 0                            | 11-13-23            | 14:58       |
| NCG incinerator                                  | 20%                         | Comingled with #02           | 11-13-23            | 14:20       |
| Starch Silo #1-TNK 0115                          | 20%                         | 0                            | 11-13-23            | 14:25       |
| Starch Silo #2-TNK 0116                          | 20%                         | 0                            | 11-13-23            | 14:26       |
| Starch Silo #3-TNK 0175                          | 20%                         | 0                            | 11-13-23            | 14:27       |
| #1 Cooling Tower                                 | 30%                         | 0                            | 11-13-23            | 14:43       |
| #2 Cooling Tower                                 | 30%                         | 0                            | 11-13-23            | 14:45       |
| #6 Chiller Cooling Tower                         | 30%                         | 0                            | 11-13-23            | 14:48       |
| Starch dust vent fan- chem. Furn                 | 5%                          | 0                            | 11-13-23            | 14:30       |
| FIREPMP1 (north) engine                          | 20%                         | 0                            | 12-8-23             | 07:10       |
| FIREPMP4 (south) engine                          | 20%                         | 0                            | 12-8-23             | 07:13       |
| #1 Lime Kiln diesel engine                       | 20%                         | 0                            | 11-13-23            | 14:40       |
| #2 Lime Kiln diesel engine                       | 20%                         | 0                            | 12-12-23            | 14:00       |
| Water plant emerg. engine                        | 20%                         | out of service               |                     |             |

\*\* Zero Emissions, denoted by "0%", means the source was observed by an IP employee and the source had zero visible emissions. Therefore, a Method 9 test was not required.  
 NOTE : The observer certifies by signing, that each observation was made more than 15 ft. away from the source, but no more than 0.25 miles away, that the sun was not in the observer's eyes, and where a vapor plume was present, the observation was made past the point where the plume was visible. Also, that the information is true and accurate the the best of their knowledge.

GRAPHIC PACKAGING INTERNATIONAL -- TEXARKANA MILL

Title V Periodic Monitoring -- Visible Emissions Observations

Report is for What Quarter? Q3 2023

Print Name of Observer J.T. Fussell

Signature John Fussell

Weather: Clear, Blue

| Source Name                                      | Ch. 111 or Air Permit Limit | Method 9 or Zero Emissions ? | Date of Observation | Time of Day |
|--|-----------------------------|------------------------------|---------------------|-------------|
| Lime System Baghouse No. 1                       | 20%                         | 0                            | 7-26-23             | 13:22       |
| Lime System Baghouse No. 2                       | 20%                         | 0                            | 7-26-23             | 13:24       |
| #5 Extruder Vents -- A & B dies and post treater | 20%                         | Method 9                     | 8-4-23              | 15:43       |
| #7 Extruder Vent on poly hopper                  | 5%                          | 0                            | 8-4-23              | 15:45       |
| #7 Extruder Vents -- A & B dies and post treater | 20%                         | 0                            | 8-4-23              | 15:50       |
| NCG incinerator                                  | 20%                         | Comingled with #602          | 7-26-23             | 13:10       |
| Starch Silo #1-TNK 0115                          | 20%                         | 0                            | 7-26-23             | 13:16       |
| Starch Silo #2-TNK 0116                          | 20%                         | 0                            | 7-26-23             | 13:17       |
| Starch Silo #3-TNK 0175                          | 20%                         | 0                            | 7-26-23             | 13:18       |
| #1 Cooling Tower                                 | 30%                         | 0                            | 7-26-23             | 13:26       |
| #2 Cooling Tower                                 | 30%                         | 0                            | 7-26-23             | 13:28       |
| #6 Chiller Cooling Tower                         | 30%                         | 0                            | 7-26-23             | 13:30       |
| Starch dust vent fan- chem. Furn                 | 5%                          | 0                            | 7-26-23             | 13:20       |
| FIREPMP1 (north) engine                          | 20%                         | 0                            | 8-4-23              | 08:30       |
| FIREPMP4 (south) engine                          | 20%                         | 0                            | 8-4-23              | 08:35       |
| #1 Lime Kiln diesel engine                       | 20%                         | 0                            | 7-26-23             | 13:36       |
| #2 Lime Kiln diesel engine                       | 20%                         | 0                            | 9-15-23             | 14:36       |
| Water plant emerg. engine                        | 20%                         | out of service               | 7-26-23             | 13:05       |

all quarter

\*\* Zero Emissions, denoted by "0%", means the source was observed by an IP employee and the source had zero visible emissions. Therefore, a Method 9 test was not required.

NOTE : The observer certifies by signing, that each observation was made more than 15 ft. away from the source, but no more than 0.25 miles away, that the sun was not in the observer's eyes, and where a vapor plume was present, the observation was made past the point where the plume was visible. Also, that the information is true and accurate the the best of their knowledge.

**GRAPHIC PACKAGING INTERNATIONAL -- TEXARKANA MILL**

**Title V Periodic Monitoring -- Visible Emissions Observations**

Report is for What Quarter? Q2 2023

Print Name of Observer J.T. Fussell

Signature John Fussell

Weather: Clear, Sunny

| Source Name                                      | Ch. 111 or Air Permit Limit | Method 9 or Zero Emissions ? | Date of Observation | Time of Day |
|--|-----------------------------|------------------------------|---------------------|-------------|
| Lime System Baghouse No. 1                       | 20%                         | 0                            | 5-1-23              | 14:00       |
| Lime System Baghouse No. 2                       | 20%                         | 0                            | 5-1-23              | 14:16       |
| #5 Extruder Vents -- A & B dies and post treater | 20%                         | Method 9                     |                     |             |
| #7 Extruder Vent on poly hopper                  | 5%                          | 0                            | 5-2-23              | 10:37       |
| #7 Extruder Vents -- A & B dies and post treater | 20%                         | Method 9                     |                     |             |
| NCG incinerator                                  | 20%                         | Comingled with PB2           | 5-1-23              | 13:30       |
| Starch Silo #1-TNK 0115                          | 20%                         | 0                            | 5-1-23              | 13:55       |
| Starch Silo #2-TNK 0116                          | 20%                         | 0                            | 5-1-23              | 13:56       |
| Starch Silo #3-TNK 0175                          | 20%                         | 0                            | 5-1-23              | 13:57       |
| #1 Cooling Tower                                 | 30%                         | 0                            | 5-1-23              | 14:21       |
| #2 Cooling Tower                                 | 30%                         | 0                            | 5-1-23              | 14:24       |
| #6 Chiller Cooling Tower                         | 30%                         | 0                            | 5-1-23              | 14:26       |
| Starch dust vent fan- chem. Furn                 | 5%                          | 0                            | 5-2-23              | 10:46       |
| FIREPMP1 (north) engine                          | 20%                         | 0                            | 6-2-23              | 07:20       |
| FIREPMP4 (south) engine                          | 20%                         | 0                            | 6-2-23              | 07:25       |
| #1 Lime Kiln diesel engine                       | 20%                         | 0                            | 4-28-23             | 10:55       |
| #2 Lime Kiln diesel engine                       | 20%                         | 0                            | 4-2-23              | 10:57       |
| Water plant emerg. engine                        | 20%                         | out of service               |                     |             |

\*\* Zero Emissions, denoted by "0%", means the source was observed by an IP employee and the source had zero visible emissions. Therefore, a Method 9 test was not required.

NOTE : The observer certifies by signing, that each observation was made more than 15 ft. away from the source, but no more than 0.25 miles away, that the sun was not in the observer's eyes, and where a vapor plume was present, the observation was made past the point where the plume was visible. Also, that the information is true and accurate the the best of their knowledge.

Our team's CAM/PM specialist has completed his review of the data you provided and has a few items to clarify. Please provide a response by **06/11/2025**.

1. In regard to the justification provided for Unit ID STARCH for CAM Option CAM-FF-002, what was converted to get 0.5" H2O to 3" H2O? Please clarify in the documents provided what corresponds to these units/parameters. I'm not sure that I see them in the documents provided. How does this correspond to the deviation limit provided of 2 and 6 on Form OP-MON? How does that correspond to the emission limit in the rule? The correlation/justification provided should correlate what the filter is projected to emit in units of the emission limit from the rule.
2. In regard to the justification provided for the units subject 30 TAC Chapter 111 § 111.111(a)(1)(C) periodic monitoring, do you not have any visible emissions data? The data provided was for units at another site. Is it because the units are not operating yet or no monitoring is being conducted at all? If they are operating, has there been any monitoring conducted? Is there any data for the units at this site?
3. For the units with natural gas combustion, we have another option in which you can monitor fuel usage and if they fire anything other than natural gas it would be considered a deviation. We could draft up a case-by-case quarterly monitoring proposal. This could also be an option in which you may satisfy periodic monitoring requirements quarterly.

Please let us 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:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>  
**Sent:** Friday, May 2, 2025 3:03 PM  
**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Cc:** Shaikh, Furqan <[Furqan.Shaikh@graphicpkg.com](mailto:Furqan.Shaikh@graphicpkg.com)>; Mueller, Karl <[Karl.Mueller@graphicpkg.com](mailto:Karl.Mueller@graphicpkg.com)>; John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** Re: Technical Review -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Unit ID STARCH: Please provide justification for the deviation limit to show how the parameters of the fabric filter that are being monitored show compliance with the emission limit in 30 TAC Chapter 111.151(a). Justification may include data obtained during the most recent performance test, manufacturer's recommendations, engineering calculations, and/or historical data to justify the deviation limit.

**GPI is providing the manufacturer's filter spec sheet and emissions testing with this submittal. The results show that emissions are compliant with 30 TAC 111.151 with a differential pressure between approximately 0.5" H2O to 3" H2O. The filter is equipped with a cleaning system using compressed air to clear dust from the filter surfaces. GPI operating procedure is to visually monitor for presence of particulate breakthrough during starch loading operations.**

Unit IDs TURBINEV, BYPASS, PMFEASV, and COOLINGTWR: In regard to these requests for periodic monitoring for 30 TAC Chapter 111 § 111.111(a)(1)(C), you have requested a quarterly frequency. Typically for vents this size, we require a weekly frequency but have been able to use a quarterly frequency when our applicants have provided 8 quarters worth of data showing that the measured opacity is well below the opacity limit in the rule. Please provide two years or 8 quarters worth of records or supporting documentation that shows the units have had no visible emissions over the time period, or if you have had visible emissions that EPA Test Method 9 determined the opacity was below the opacity limit. We understand that this is an initial permit application and you may not have 8 quarters worth of data. In that case, we may need to revert to a weekly frequency until you have the data to support a quarterly frequency which you can change at a later date in a renewal or significant revision. Once we receive the records or documentation, we will evaluate what the appropriate periodic monitoring will be.

**GPI believes that there is limited potential for nuisance and health impacts associated with quarterly VEO monitoring on the units where weekly monitoring has been proposed due to the nature of the emissions generated by these units. Potential for VE is low in these processes because the emissions from Unit IDs TURBINEV and BYPASS are associated only with natural gas combustion. BYPASS will only have emissions during non-routing MSS operations when heat is not needed at the paper machine, and during these times TURBINEV will be in a forced idle. Emissions from Unit IDs PMFEASV and COOLINGTWR are primarily water vapor, with little particulate matter entrained in the vapor. Total dissolved solids present in the water entering the cooling tower are required to be monitored on a weekly basis in the NSR and are limited to 5,000 ppmw. GPI operates a paper mill in Queen City, Texas (Texarkana Mill, RN100543115, TVOP O1378) that is required to perform VEO. Texarkana Mill performs VEO on the cooling tower on a quarterly basis and has not noted VE in the past eight quarters.**

The VEO records are included with this submittal.

Troy

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**From:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Sent:** Monday, April 14, 2025 10:57 AM  
**To:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>  
**Cc:** Shaikh, Furqan <[Furqan.Shaikh@graphicpkg.com](mailto:Furqan.Shaikh@graphicpkg.com)>; Mueller, Karl <[Karl.Mueller@graphicpkg.com](mailto:Karl.Mueller@graphicpkg.com)>; John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** RE: Technical Review -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Good morning Mr. Gayer,

Thank you for providing the requested updates. I have submitted your case-by-case OP-MONS to our team's CAM/PM specialist for review. He is in the process of reviewing them and has requested that I ask you for the information as listed in item #1 below.

Please resolve by **04/28/2025**.


**1. Form OP-MONS:**

- Unit ID STARCH: Please provide justification for the deviation limit to show how the parameters of the fabric filter that are being monitored show compliance with the emission limit in 30 TAC Chapter 111.151(a). Justification may include data obtained during the most recent performance test, manufacturer's recommendations, engineering calculations, and/or historical data to justify the deviation limit.
- Unit IDs TURBINEV, BYPASS, PMFEASV, and COOLINGTWR: In regard to these requests for periodic monitoring for 30 TAC Chapter 111 § 111.111(a)(1)(C), you have requested a quarterly frequency. Typically for vents this size, we require a weekly frequency but have been able to use a quarterly frequency when our applicants have provided 8 quarters worth of data showing that the measured opacity is well below the opacity limit in the rule. Please provide two years or 8 quarters worth of records or supporting documentation that shows the units have had no visible emissions over the time period, or if you have had visible emissions that EPA Test Method 9 determined the opacity was below the opacity limit. We understand that this is an initial permit application and you may not have 8 quarters worth of data. In that case, we may need to revert to a weekly frequency until you have the data to support a quarterly frequency which you can change at a later date in a renewal or significant revision. Once we receive the records or documentation, we will evaluate what the appropriate periodic monitoring will be.

Please let us 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:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>  
**Sent:** Thursday, March 27, 2025 10:08 PM  
**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Cc:** Shaikh, Furqan <[Furqan.Shaikh@graphicpkg.com](mailto:Furqan.Shaikh@graphicpkg.com)>; Mueller, Karl <[Karl.Mueller@graphicpkg.com](mailto:Karl.Mueller@graphicpkg.com)>  
**Subject:** Re: Technical Review -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

March 27, 2025

Emily Knodell  
Permit Reviewer  
Texas Commission on Environmental Quality (TCEQ)  
Air Permits Division/Operating Permits Section  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087

**Re: Updated OP-UA6 and OP-MON for Title V Operating Permit O4687  
Graphic Packaging International, LLC**

Dear Ms. Knodell:

Graphic Packaging International, LLC (GPI) owns a facility in Waco, McLennan County, Texas, (Facility) that is currently under construction, with start-up anticipated in the fourth quarter (Q4) of 2025. An initial Title V Air Permit application for the Facility was submitted to the TCEQ electronically via the State of Texas Environmental Electronic Reporting System (STEERS) on September 18, 2024.

In response to your e-mail dated March 21<sup>st</sup>, the Facility is submitting the enclosed Title V Operating Permit Application forms. TCEQ Form OP-UA6 was updated to the newest form revision (09/24) and additional information was included on Table 3a. It was also noted during review that an update was needed to Table 3b. The response for Column “ACF Option NOx” for Unit ID No. BOILER1 was changed from “F10-NG” to “OTHR” because there is no annual capacity factor that applies to this unit.

Table 1a on TCEQ Form OP-MON for Unit ID No. PM-01 was updated to reflect the correct Unit ID No. PMFEASV to be consistent with the rest of the application.

Should you have any questions about this submittal, please feel free to contact me at 936.273.3169 or tgayer@all4inc.com.

Sincerely,  
**ALL4 LLC**

Troy Gayer  
Managing Consultant

cc: Karl Mueller – Graphic Packaging International (GPI)

Attachments: TCEQ Form OP-UA6  
TCEQ Form OP-MON

Electronic Submittal (Emily.Knodell@tceq.texas.gov)

**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-Institutional Steam Generating Units**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 03/28/2025 | O4687      | RN111634507          |

| Unit ID No. | SOP Index No. | Construction/<br>Modification<br>Date | Heat Input<br>Capacity | Subpart Da | Changes to<br>Existing<br>Affected<br>Facility | Subpart Ea,<br>Eb, AAAA, or<br>CCCC | Subpart<br>KKKK | Subpart Cb or<br>BBBB | Temporary<br>Boiler |
|-------------|---------------|---------------------------------------|------------------------|------------|--|-------------------------------------|-----------------|-----------------------|---------------------|
| BOILER1     | 60Db-1        | 05+CR                                 | 250+                   | NO         | NO   | NO                                  | NO              | NO                    | NO                  |
|             |               |                                       |                        |            |  |                                     |                 |                       |                     |
|             |               |                                       |                        |            |  |                                     |                 |                       |                     |
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**Boiler/Steam Generator/Steam Generating Unit Attributes**  
**Form OP-UA6 (Page 7)**  
**Federal Operating Permit Program**  
**Table 3b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**  
**Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 03/28/2025 | O4687      | RN111634507          |

| Unit ID No. | SOP Index No. | D-Series Fuel Type | D-Series Fuel Type | D-Series Fuel Type | Subpart D | Additional Applicability Requirement | ACF Option SO <sub>2</sub> | ACF Option PM | ACF Option NO <sub>x</sub> |
|-------------|---------------|--------------------|--------------------|--------------------|-----------|--------------------------------------|----------------------------|---------------|----------------------------|
| BOILER1     | 60Db-1        | NG                 |                    |                    |           | NONE                                 | OTHR                       | OTHR          | OTHR                       |
|             |               |                    |                    |                    |           |                                      |                            |               |                            |
|             |               |                    |                    |                    |           |                                      |                            |               |                            |
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**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-Institutional Steam Generating Units**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 03/28/2025 | O4687      | RN111634507          |

| Unit ID No. | SOP Index No. | 60.42b (k)(2) Low Sulfur Exemption | 60.42b (k)(4) Alternative | Post-Combustion Control | 60.43b(h)(2) Alternative | Electrical or Mechanical Output | Output Based Limit | 60.49 Da(n) Alternative | 60.49 Da(m) Alternative |
|-------------|---------------|------------------------------------|---------------------------|-------------------------|--------------------------|---------------------------------|--------------------|-------------------------|-------------------------|
| BOILER1     | 60Db-1        | YES                                |                           |                         |                          | NO                              |                    |                         |                         |
|             |               |                                    |                           |                         |                          |                                 |                    |                         |                         |
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**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-Institutional Steam Generating Units**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 03/28/2025 | TBA        | RN111634507          |

| Unit ID No. | SOP Index No. | Residual Oil Sampling | Monitoring Type PM | Monitoring Type PM (Opacity) | Monitoring Type NOx | Monitoring Type SO <sub>2</sub> | Technology Type | Unit Type | Heat Release Rate | Heat Input Gas/Oil | Heat Input Wood | Fuel Heat Input |
|-------------|---------------|-----------------------|--------------------|------------------------------|---------------------|---------------------------------|-----------------|-----------|-------------------|--------------------|-----------------|-----------------|
| BOILER1     | 60Db-1        |                       | NONE               | NONE                         | CEM                 | FLCRT                           | NONE            | OTHER     | NGHIGH            |                    |                 |                 |
|             |               |                       |                    |                              |                     |                                 |                 |           |                   |                    |                 |                 |
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**Boiler/Steam Generator/Steam Generating Unit Attributes**  
**Form OP-UA6 (Page 10)**  
**Federal Operating Permit Program**  
**Table 3e: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**  
**Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 03/28/2025 | TBA        | RN111634507          |

| Unit ID No. | SOP Index No. | Alternate Emission Limit (AEL) | AEL ID. NO. |
|-------------|---------------|--------------------------------|-------------|
| BOILER1     | 60Db-1        |                                |             |
|             |               |                                |             |
|             |               |                                |             |
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**Boiler/Steam Generator/Steam Generating Unit Attributes**  
**Form OP-UA6 (Page 37)**  
**Federal Operating Permit Program**  
**Table 14a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)**  
**Subpart DDDDD: Industrial, Commercial, and Institutional Boilers**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 03/28/2025 | TBA        | RN111634507          |

| Unit ID No. | SOP/GOP Index No. | Commence | Table Applicability | HCl Emission | HCl-CMS |
|-------------|-------------------|----------|---------------------|--------------|---------|
| BOILER1     | 63DDDDD-1         | NEW      | T3.3G1              |              |         |
| HRSG        | 63DDDDD-1         | NEW      | T3.1TS              |              |         |
|             |                   |          |                     |              |         |
|             |                   |          |                     |              |         |
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Texas Commission on Environmental Quality  
Monitoring Requirements  
Form OP-MON  
(Page 1)  
Federal Operating Permit Program  
Table 1a: CAM/PM Additions

| I. Identifying Information  |                            |                         |
|---|----------------------------|-------------------------|
| Account No.:  | RN No.: <b>RN111634507</b> | CN: <b>CN601710460</b>  |
| Permit No: <b>TBA</b>   |                            | Project No.: <b>TBA</b> |
| Area Name: <b>Graphic Packaging International Waco Mill</b>   |                            |                         |
| Company Name: <b>Graphic Packaging International, LLC</b>   |                            |                         |
| II. Unit/Emission Point/Group/Process Information   |                            |                         |
| Revision No.:   |                            |                         |
| Unit/EPN/Group/Process ID No.: <b>PMFEASV</b>   |                            |                         |
| Applicable Form: <b>OP-UA15</b>   |                            |                         |
| III. Applicable Regulatory Requirement  |                            |                         |
| Name: <b>30 TAC Chapter 111</b>   |                            |                         |
| SOP/GOP Index No.: <b>R1111-1</b>   |                            |                         |
| Pollutant: <b>PM (OPACITY)</b>  |                            |                         |
| Main Standard: <b>§111.111(a)(1)(C)</b>   |                            |                         |
| Monitoring Type: <b>PM</b>  |                            |                         |
| Deviation Limit: <b>The presence of visible emissions indicates a deviation unless a Method 9 Observation is completed within 24 hours to establish that opacity is below 7%.</b> |                            |                         |
| IV. Control Device Information  |                            |                         |
| Control Device ID No.: <b>N/A</b>   |                            |                         |
| V. CAM Case-by-case   |                            |                         |
| Indicator:  |                            |                         |
| Minimum Frequency:  |                            |                         |
| Averaging Period:   |                            |                         |
| QA/QC Procedures:   |                            |                         |
| Verification Procedures:  |                            |                         |
| Representative Date:  |                            |                         |

**VI. Periodic Monitoring Case-by-case**

Indicator: **Visible Emissions**

Minimum Frequency: **Once per Calendar Quarter**

Averaging Period: **N/A**

Periodic Monitoring Text:

**Visible emissions observations shall be made and recorded. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 miles, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor.**

**If visible emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If a Test Method 9 is performed, the opacity limit is the corresponding opacity limit associated with the particulate matter standard in the underlying applicable requirement. If there is no corresponding opacity limit in the underlying applicable requirement, the maximum opacity will be established using the most recent performance test. If the result of the Test Method 9 is opacity above the corresponding opacity limit (associated with the particulate matter standard in the underlying applicable requirement or as identified as a result of a previous performance test to establish the maximum opacity limit), the permit holder shall report a deviation.**

Good evening, Ms. Knodell,

Please find attached the requested updates in response to your items below, and let us know if you have any additional questions.

Thank you,



**Troy Gayer** / Managing Consultant  
936.274.3169 / [Profile](#) / [LinkedIn](#)  
[www.all4inc.com](#) / [Locations](#) / [Articles](#) / [Podcast](#) / [Training](#)  
**ALL4** // STRATEGY WITH SOLUTION. PARTNERSHIP WITH A PURPOSE.

---

**From:** Emily Knodell  
**Sent:** Friday, March 21, 2025 1:37 PM  
**To:** Troy Gayer; [Furqan.Shaikh@graphicpkg.com](mailto:Furqan.Shaikh@graphicpkg.com)  
**Subject:** RE: Technical Review -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Good afternoon,

During technical review, the following items were found. Please resolve by 03/28/2025.

1. **Form OP-UA06:** This form has been recently updated and now requires new answers. Please send an updated Form OP-UA06, ensuring it is the most recent version of the form. It should say "Revised 09/24" in the bottom left hand corner of the pages. Please note that Table 3a looks slightly different than it did before, such as the column "Subpart Ea, Eb, AAAA, or CCCC" column and the "Temporary Boiler" column is new (see my notes below). Table 3b has new columns "Subpart J", "Subpart E". The other tables also have similar modifications.
  - Regulation: 40 CFR Part 60, Subpart 60Db-1: **Table 3 (a-e)**.

Affected Unit IDs/Groups: Unit ID BOILER1, Index 60Db-1.

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-Institutional Steam Generating Units  
Texas Commission on Environmental Quality

| Date        |               | Permit No.                     |                     |            | Regulated Entity No.                  |                               |              |                    |                  |
|-------------|---------------|--------------------------------|---------------------|------------|---------------------------------------|-------------------------------|--------------|--------------------|------------------|
| Unit ID No. | SOP Index No. | Construction/Modification Date | Heat Input Capacity | Subpart Da | Changes to Existing Affected Facility | Subpart Ea, Eb, AAAA, or CCCC | Subpart KKKK | Subpart Cb or BBBB | Temporary Boiler |
|             |               |                                |                     |            |                                       |                               |              |                    |                  |
|             |               |                                |                     |            |                                       |                               |              |                    |                  |
|             |               |                                |                     |            |                                       |                               |              |                    |                  |
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|             |               |                                |                     |            |                                       |                               |              |                    |                  |

2. **Form OP-MON:** "PM01" is used as the Unit ID No. on one of the OP-MONS. Did you mean to put Unit ID PMFEASV such as what was entered on Form OP-SUM?

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.: <i>RN111634507</i> | CN: <i>CN601710460</i> |
| Permit No: <i>TBA</i>   | Project No.: <i>TBA</i>    |                        |
| Area Name: <i>Graphic Packaging International Waco Mill</i>   |                            |                        |
| Company Name: <i>Graphic Packaging International, LLC</i>   |                            |                        |
| <b>II. Unit/Emission Point/Group/Process Information</b>  |                            |                        |
| Revision No.:   |                            |                        |
| Unit/EPN/Group/Process ID No.: <i>PM01</i> <a href="#">Did you mean Unit ID PMFEASV?</a>  |                            |                        |
| Applicable Form: <i>OP-UA15</i>   |                            |                        |
| <b>III. Applicable Regulatory Requirement</b>   |                            |                        |
| Name: <i>30 TAC Chapter 111</i>   |                            |                        |
| SOP/GOP Index No.: <i>R1111-1</i>   |                            |                        |
| Pollutant: <i>PM (OPACITY)</i>  |                            |                        |
| Main Standard: <i>§111.111(a)(1)(C)</i>   |                            |                        |
| Monitoring Type: <i>PM</i>  |                            |                        |
| Deviation Limit: <i>The presence of visible emissions indicates a deviation unless a Method 9 Observation is completed within 24 hours to establish that opacity is below 7%.</i> |                            |                        |
| <b>IV. Control Device Information</b>   |                            |                        |
| Control Device ID No.: <i>N/A</i>   |                            |                        |
| <b>V. CAM Case-by-case</b>  |                            |                        |
| Indicator:  |                            |                        |
| Minimum Frequency:  |                            |                        |
| Averaging Period:   |                            |                        |
| QA/QC Procedures:   |                            |                        |
| Verification Procedures:  |                            |                        |
| Representative Date:  |                            |                        |

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, December 13, 2024 9:09 AM  
**To:** Troy Gayer <[tgayer@all4inc.com](mailto:tgayer@all4inc.com)>  
**Subject:** FW: Technical Review -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

---

**From:** Emily Knodell  
**Sent:** Thursday, October 10, 2024 1:36 PM  
**To:** [Furquan.Shaikh@graphicpkg.com](mailto:Furquan.Shaikh@graphicpkg.com)  
**Subject:** Technical Review -- FOP O4687/Project 37159, Graphic Packaging International, LLC/Graphic Packaging International Waco Mill

Good afternoon Mr. Shaikh,

My name is Emily Knodell and I have been assigned to the Federal Operating Permit (FOP) *initial issuance* application of Permit No. **04687** for *Graphic Packaging International, LLC/Graphic Packaging International Waco Mill*. This application has been assigned Project No. **37159**. 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.

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](#).**

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

I would appreciate a quick confirmation that this email has reached you.

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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**From:** [eNotice TCEQ](#)  
**To:** [brian.birdwell@senate.texas.gov](mailto:brian.birdwell@senate.texas.gov); [Charles.anderson@house.texas.gov](mailto:Charles.anderson@house.texas.gov)  
**Subject:** TCEQ Notice - Permit Number O4687  
**Date:** Friday, September 27, 2024 8:50:10 AM  
**Attachments:** [TCEQ Notice - O4687\\_37159.pdf](#)

---

This email is being sent to electronically transmit an official document issued by the Office of Air of the Texas Commission on Environmental Quality.

This email is being sent to you because either (a) you filed a document with the Office of the Chief Clerk that made you part of the official mailing list for the above referenced matter, or (b) notice to you is legally required. As authorized by Texas Water Code 5.128, this electronic transmittal is replacing the previous practice of hard copy distribution. Amendments to Texas Government Code 552.137 prompted a change to the agency's privacy policy regarding confidentiality of certain email addresses. The revised privacy policy can be viewed at [http://www.tceq.state.tx.us/help/policies/electronic\\_info\\_policy.html](http://www.tceq.state.tx.us/help/policies/electronic_info_policy.html).

Questions regarding this email may be submitted either by replying directly to this email or by calling Mr. Jesse Chacon, P.E. with the Air Permits Division at (512) 239-5759.

The attached document is provided in an Adobe Acrobat .pdf format. If you cannot display the attachment, you may need to visit the Adobe web site (<http://get.adobe.com/reader>) to download the free Adobe Acrobat Reader software.

Jon Niermann, *Chairman*  
Bobby Janecka, *Commissioner*  
Catarina R. Gonzales, *Commissioner*  
Kelly Keel, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

September 27, 2024

THE HONORABLE BRIAN BIRDWELL  
TEXAS SENATE  
PO BOX 12068  
AUSTIN TX 78711-2068

Re: Accepted Federal Operating Permit Initial Issuance Application  
Project Number: 37159  
Permit Number: O4687  
Graphic Packaging International, LLC  
Graphic Packaging International Waco Mill  
Waco, McLennan County  
Regulated Entity Number: RN111634507  
Customer Reference Number: CN601710460

Dear Senator Birdwell:

This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) initial issuance application for a site located in your district. As part of this permitting process, the applicant is required to publish a formal newspaper public notice. The notice will inform the public of their right to make comments or request a public hearing. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. <https://gisweb.tceq.texas.gov/LocationMapper/?marker=-97.191111,31.475556&level=13>.

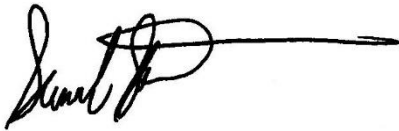
The FOP program regulates both new and existing major sources of emissions. The goal of the program is to improve air quality in Texas through increased compliance by codifying existing applicable regulatory requirements into the FOP. The FOP provides the applicant authorization to operate the equipment at the site. The FOP identifies and codifies air emission requirements (known as applicable requirements) that apply to the emission units at the site. The FOP does not authorize construction of emission units or emissions from those units. The New Source Review (NSR) permit is the mechanism for these authorizations.

The Honorable Brian Birdwell  
Page 2  
September 27, 2024

Re: Accepted Federal Operating Permit Initial Issuance Application

This letter is being sent to you for information only and no action is required. If you need further information, please contact me at (512) 239-1250.

Sincerely,

A handwritten signature in black ink, appearing to read "Samuel Short", followed by a long horizontal line extending to the right.

Samuel Short, Deputy Director  
Air Permits Division  
Office of Air  
Texas Commission on Environmental Quality

Jon Niermann, *Chairman*  
Bobby Janecka, *Commissioner*  
Catarina R. Gonzales, *Commissioner*  
Kelly Keel, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

September 27, 2024

THE HONORABLE CHARLES ANDERSON  
TEXAS HOUSE OF REPRESENTATIVES  
PO BOX 2910  
AUSTIN TX 78768-2910

Re: Accepted Federal Operating Permit Initial Issuance Application  
Project Number: 37159  
Permit Number: O4687  
Graphic Packaging International, LLC  
Graphic Packaging International Waco Mill  
Waco, McLennan County  
Regulated Entity Number: RN111634507  
Customer Reference Number: CN601710460

Dear Representative Anderson:

This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) initial issuance application for a site located in your district. As part of this permitting process, the applicant is required to publish a formal newspaper public notice. The notice will inform the public of their right to make comments or request a public hearing. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application.

<https://gisweb.tceq.texas.gov/LocationMapper/?marker=-97.191111,31.475556&level=13>.

The FOP program regulates both new and existing major sources of emissions. The goal of the program is to improve air quality in Texas through increased compliance by codifying existing applicable regulatory requirements into the FOP. The FOP provides the applicant authorization to operate the equipment at the site.

This letter is being sent to you for information only and no action is required. If you need further information, please contact me at (512) 239-1250.

Sincerely,

A handwritten signature in black ink, appearing to read "Samuel Short", with a long horizontal line extending to the right.

Samuel Short, Deputy Director  
Air Permits Division  
Office of Air  
Texas Commission on Environmental Quality

## Texas Commission on Environmental Quality

### Title V New

#### Site Information (Regulated Entity)

|   |  |
|---|--|
| What is the name of the permit area to be authorized?                   | GRAPHIC PACKAGING INTERNATIONAL<br>WACO MILL |
| Does the site have a physical address?                                  | Yes  |
| Physical Address  |  |
| Number and Street   | 301 SHEEHY PKWY                              |
| City  | WACO   |
| State   | TX   |
| ZIP   | 76712  |
| County  | MCLENNAN                                     |
| Latitude (N) (##.#####)   | 31.475556                                    |
| Longitude (W) (-###.#####)  | -97.191111                                   |
| 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)?                             | RN111634507                                  |
| What is the name of the Regulated Entity (RE)?                          | GRAPHIC PACKAGING INTERNATIONAL<br>WACO MILL |
| Does the RE site have a physical address?                               | No   |
| Because there is no physical address, describe how to locate this site: | 301 SHEESHY PARKWAY WACO TX 76712            |
| City  | WACO   |
| State   | TX   |
| ZIP   | 76712  |
| County  | MCLENNAN                                     |
| Latitude (N) (##.#####)   | 31.475556                                    |
| Longitude (W) (-###.#####)  | -97.191111                                   |
| Facility NAICS Code   | 322130                                       |
| What is the primary business of this entity?                            |  |

#### Customer (Applicant) Information

|  |                                      |
|--|--------------------------------------|
| How is this applicant associated with this site? | Owner Operator                       |
| What is the applicant's Customer Number (CN)?    | CN601710460                          |
| Type of Customer                                 | Corporation                          |
| Full legal name of the applicant:                |                                      |
| Legal Name                                       | Graphic Packaging International, LLC |
| Texas SOS Filing Number                          | 4414206                              |
| Federal Tax ID                                   | 840772929                            |
| State Franchise Tax ID                           | 18407729294                          |
| State Sales Tax ID                               |                                      |
| Local Tax ID                                     |                                      |

|                                   |           |
|-----------------------------------|-----------|
| DUNS Number                       | 840772929 |
| Number of Employees               | 501+      |
| Independently Owned and Operated? | No        |

## Responsible Official Contact

---

Person TCEQ should contact for questions about this application:

|  |                                     |
|--|-------------------------------------|
| Organization Name  | Graphic Packaging International LLC |
| Prefix   | MR                                  |
| First  | Joseph                              |
| Middle   |                                     |
| Last   | Tomon                               |
| Suffix   |                                     |
| Credentials  |                                     |
| Title  | Mill Manager                        |
| Enter new address or copy one from list:                     |                                     |
| Mailing Address  |                                     |
| Address Type   | Domestic                            |
| Mailing Address (include Suite or Bldg. here, if applicable) | 301 SHEEHY PKWY                     |
| Routing (such as Mail Code, Dept., or Attn:)                 |                                     |
| City   | WACO                                |
| State  | TX                                  |
| ZIP  | 76712                               |
| Phone (###-###-####)   | 2966661478                          |
| Extension  |                                     |
| Alternate Phone (###-###-####)                               |                                     |
| Fax (###-###-####)   |                                     |
| E-mail   | joseph.tomon@GRAPHICPKG.COM         |

## Technical Contact

---

Person TCEQ should contact for questions about this application:

|  |                                     |
|--|-------------------------------------|
| Same as another contact?                                     |                                     |
| Organization Name  | Graphic Packaging International LLC |
| Prefix   | MR                                  |
| First  | Furqan                              |
| Middle   |                                     |
| Last   | Shaikh                              |
| Suffix   |                                     |
| Credentials  |                                     |
| Title  | Director, Corporate HSE             |
| Enter new address or copy one from list:                     |                                     |
| Mailing Address  |                                     |
| Address Type   | Domestic                            |
| Mailing Address (include Suite or Bldg. here, if applicable) | 1500 RIVEREDGE PKWY                 |
| Routing (such as Mail Code, Dept., or Attn:)                 |                                     |
| City   | ATLANTA                             |

|                                |                              |
|--------------------------------|------------------------------|
| State                          | GA                           |
| ZIP                            | 30328                        |
| Phone (###-###-####)           | 4707925469                   |
| Extension                      |                              |
| Alternate Phone (###-###-####) |                              |
| Fax (###-###-####)             |                              |
| E-mail                         | furqan.shaikh@graphicpkg.com |

## Title V General Information - New

|   |                      |
|---|----------------------|
| 1) Permit Latitude Coordinate:  | 31 Deg 28 Min 32 Sec |
| 2) Permit Longitude Coordinate:   | 97 Deg 11 Min 28 Sec |
| 3) Is this submittal a new application or an update to an existing application?   | New Application      |
| 3.1. What type of Federal Operating Permit are you applying for?  | SOP                  |
| 3.2. Is this submittal an abbreviated or a full application?  | Full                 |
| 3.3. Is this application for a portable facility?   | No                   |
| 3.4. Is the site a non-major source subject to the Federal Operating Permit Program?                                    | No                   |
| 3.5. Are there any permits that should be voided upon issuance of this permit application through permit conversion?    | No                   |
| 3.6. Are there any permits that should be voided upon issuance of this permit application through permit consolidation? | No                   |
| 4) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?                      | No                   |

## Title V Attachments New

### Attach OP-1 (Site Information Summary)

[File Properties]

|           |  |
|-----------|--|
| File Name | <a href=/ePermitsExternal/faces/file?fileId=214990>OP-1.pdf</a>  |
| Hash      | ACEF072CF606BB9023FBC74F9646BF9C3EA45C22137E50905A681491E246C9C2 |
| MIME-Type | application/pdf  |

### Attach OP-ACPS (Application Compliance Plan and Schedule)

[File Properties]

|           |  |
|-----------|--|
| File Name | <a href=/ePermitsExternal/faces/file?fileId=215007>OP-ACPS.pdf</a> |
| Hash      | 8FD9508341BF66939534FD22F39BE1CC164A442ED80A33C109292672357F31EB   |
| 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=215000>OP-REQ1.pdf</a> |
| Hash      | 45A3BF1D9D8F666530BE810C52410AA23F2BB28BF2AF4595475F6697294F356B   |
| MIME-Type | application/pdf  |

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=215001>OP-REQ2.pdf</a>  
Hash FF84B5EB37EDD802E30ECB65CD0EED38214349874386E780BE3E2838FC621C2C  
MIME-Type application/pdf

Attach OP-REQ3 (Applicable Requirements Summary)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=215005>OP-REQ3.pdf</a>  
Hash 98449068F9696A81039D747DE290A3817BEB00D253AAD1F47B1F850EF89BFB5E  
MIME-Type application/pdf

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

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=214992>OP-PBR SUP.pdf</a>  
Hash 2122AF1AA6DFBFF2CAD2B8893D3260F4324E9CB60DD9ADDD662A7C21B461E387  
MIME-Type application/pdf

Attach OP-SUM (Individual Unit Summary)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=214991>OP-SUM.pdf</a>  
Hash FBE1CD34AB3ABF42019F6F4CD03748964AEDCE8318D3E03144FE340F24274AE9  
MIME-Type application/pdf

Attach OP-MON (Monitoring Requirements)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=215006>OP-MON.pdf</a>  
Hash 36AC7062449C8350D47A5441909B2E4087C3146B266665C7511531997C1BA000  
MIME-Type application/pdf

Attach OP-UA (Unit Attribute) Forms

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=214998>OP-UA11.pdf</a>  
Hash 5BA18FFF2E0F470AF2F1EAA4AA9988F20F014D5CA160FECA493FA761DD3363DD  
MIME-Type application/pdf

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=214999>OP-UA15.pdf</a>  
Hash 111C013D711A4FD594645E212EDFE2BC0773537BAF88B9F4F1D9FBB1A3EDB8D3  
MIME-Type application/pdf

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=214994>OP-UA2.pdf</a>  
Hash 4DC859ED01D897AAA410FD540EFF97ABED0D4F7BA609695854C6917BA34AC6DD  
MIME-Type application/pdf

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=214995>OP-UA6.pdf</a>  
Hash F91DDEE4E606F8A72262D32083F46DA29F0E58A7216791ECFD492EC07947A7CA  
MIME-Type application/pdf

Attach OP-CRO2 (Change of Responsible Official Information)

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=215008>GPI Waco Title V.pdf</a>  
Hash DC641FEDEA4B4EC82BCB0E9FEB7049DD9EC63DF822243AD7D65FF7B0A5767018  
MIME-Type application/pdf

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=214993>PIP.pdf</a>  
Hash B0F4AB73D415071FA21A2F8CF002F75A244344880B43E60E9682069025539CF4  
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

## 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 Joseph F Tomon, the owner of the STEERS account ER101432.
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 New.
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: Joseph F Tomon OWNER OPERATOR

Account Number: ER101432  
Signature IP Address: 170.85.100.171

Signature Date: 2024-09-18  
Signature Hash: 899C235AE61542BD910EDA20EFAEA1E441EE960852C728605BC2223899ACF73A  
Form Hash Code at time of Signature: EA1D993B2899C6F46D3C62DC07EF2850948E33D9164E9E0A434A0C263DD64E4D

## Submission

---

Reference Number: The application reference number is 679754  
Submitted by: The application was submitted by ER101432/Joseph F Tomon  
Submitted Timestamp: The application was submitted on 2024-09-18 at 09:02:34 CDT  
Submitted From: The application was submitted from IP address 170.85.100.171  
Confirmation Number: The confirmation number is 564098  
Steers Version: The STEERS version is 6.82

## Additional Information

---

Application Creator: This account was created by Troy Gayer



# SITE OPERATING PERMIT INITIAL APPLICATION

GRAPHIC PACKAGING INTERNATIONAL, LLC – WACO, TX

AUGUST 2024

SUBMITTED BY:



**Graphic Packaging International, LLC**  
1500 Riveredge Parkway NW  
Suite 100  
Atlanta, GA 30328

SUBMITTED TO:



**Texas Commission on Environmental Quality**  
Air Permits Division  
12100 Park 35 Circle, MC-163  
Austin, TX 78753



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## 1. INTRODUCTION

Graphic Packaging International, LLC (GPI) is constructing a recycle coated paperboard facility in Waco, McLennan County, Texas (Waco Mill, Facility). The Waco Mill is located at 301 Sheehy Parkway, Waco, Texas. GPI is submitting this application to obtain an initial Site Operating Permit (SOP) for the Facility.

The Waco Mill is subject to the permitting requirements of the Texas Commission on Environmental Quality (TCEQ). GPI submitted an initial New Source Review (NSR) Permit Application to TCEQ for the construction of the Facility (Project No. 352548) and obtained authorization under NSR Permit No. 171518. Construction has since commenced, and the Facility is estimated to startup by October 2025. The central activity at the Waco Mill will be paperboard manufacturing [Standard Industrial Classification (SIC) code 2631].

Title V of the 1990 Federal Clean Air Act (CAA) Amendments mandated a permitting program requiring all major sources to obtain an operating permit in order to clearly define all applicable air quality requirements. The federal regulations implementing Title V of the 1990 CAA Amendments are codified in 40 CFR Part 70. The Part 70 regulations set out the requirements that state agencies must follow to implement the Title V operating permit program. Each state was required to develop a plan and to submit the plan to the United States Environmental Protection Agency (U.S. EPA) for approval. The TCEQ developed such a program and received full program approval on November 30, 2001. The Texas regulations, developed by the TCEQ, are referred to as the Federal Operating Permits (FOP) program and are contained in Title 30 Texas Administrative Code (TAC) Chapter 122.

The applicability of the FOP program requirements is defined in 30 TAC §122.120, which state that they are applicable to any site that is a major source of air pollutants. The sitewide potential to emit (PTE) determines whether the site is a major source and thus subject to the FOP program. The criteria for whether a site is a major source are defined in 30 TAC §122.10(13) and vary depending on the pollutant and the attainment status of the area in which the site is located. The Facility is located in McLennan County, which is designated as attainment or unclassifiable for all of the national ambient air quality standards (NAAQS). Therefore, for a site to be considered a major source and subject to the FOP program, the PTE of any air pollutant must equal or exceed 100 tons per year. Additionally, if the PTE equals or

exceeds 10 tons per year (tpy) of any individual hazardous air pollutant (HAP) or 25 tpy of any combination of HAP then the site would be considered a major source. The sitewide PTE and the comparison to the individual applicable major source thresholds has been included in Table 1-1. The Waco Mill will be a major source of HAPs and therefore required by 30 TAC Chapter 122 to submit an initial application for a SOP before starting operation. This document constitutes the required initial application for a SOP and contains all required forms, supporting information, and certification by a signed Form OP-CRO1 (Application).

**Table 1-1**  
**Summary of FOP Program Applicability**

| Pollutant                                     | PTE (tpy) | 30 TAC §122.10(13) Major Source Threshold | Major Source? |
|---|-----------|---|---------------|
| Nitrogen Oxides (NO <sub>x</sub> )            | 79.58     | 100                                       | No            |
| Sulfur Dioxide (SO <sub>2</sub> )             | 4.44      | 100                                       | No            |
| Carbon Monoxide (CO)                          | 98.33     | 100                                       | No            |
| Volatile Organic Compounds (VOC)              | 55.64     | 100                                       | No            |
| Particulate Matter (PM)                       | 43.76     | 100                                       | No            |
| PM Less than 10 Microns (PM <sub>10</sub> )   | 39.81     | 100                                       | No            |
| PM Less than 2.5 Microns (PM <sub>2.5</sub> ) | 37.10     | 100                                       | No            |
| Lead (Pb)                                     | 1.12E-3   | 100                                       | No            |
| Acetaldehyde                                  | 11.07     | 10  | Yes           |
| Methanol                                      | 12.86     | 10  | Yes           |
| Total HAP                                     | 37.11     | 25  | Yes           |

The Facility includes many small storage tanks that store low vapor pressure materials and have no applicable State or Federal emissions standards. Form OP-UA3, the unit attribute form for storage vessels, describes “off-permit” sources as those that are pressurized and designed to operate in excess of 30 pounds per square inch absolute (psia) with no emissions to atmosphere. Although the tanks at the Waco Mill are not pressurized, they have not been included on a Form OP-UA3 because they are not subject to the requirements of any of the New Source Performance Standards (NSPS) or Maximum Achievable Control Technology (MACT) rules included on the unit attribute form (e.g., 40 CFR Part 60, Subparts K or Kb). In addition, other small storage containers (e.g., drums, totes) are present at the site but are not addressed in this application due to size or service (e.g., water). Because no storage tanks currently at the

site are potentially subject to rules addressed by Form OP-UA3, the form is not included in this Application. A list of the tanks, including a description and their size, has been included in Table 1-2.

**Table 1-2**  
**Tanks Not Listed on the Form OP-UA3**

| <b>Equipment/Group ID</b> | <b>Tank Description</b>                          | <b>Equipment Volume (gallons)</b> |
|---------------------------|--|-----------------------------------|
| BIOTNK                    | Wet End Biocide Tank                             | 6,500                             |
| BLCHTNK                   | Bleach Day Tank                                  | 800                               |
| BLDCOAT                   | Blade Coating Station Machine Tank               | 1,370                             |
| CAUSTNK                   | Caustic Felt Wash Bulk Storage Tank              | 6,650                             |
| CBSTNK                    | Coating Biocide Storage Tank                     | 400                               |
| CDESTNK                   | Coating Defoamer Storage Tank                    | 400                               |
| CDISTNK                   | Coating Dispersant Storage Tank                  | 400                               |
| CLAYTNK1                  | Coating Clay Storage Tank #1                     | 40,000                            |
| CLAYTNK2                  | Coating Clay Storage Tank #2                     | 40,000                            |
| CLAYTNK3                  | Coating Ground Calcium Carbonate Storage Tank #1 | 26,400                            |
| CLAYTNK4                  | Coating Ground Calcium Carbonate Storage Tank #2 | 26,400                            |
| COATTNK1                  | Coating Color Preparation Storage Tank #1        | 3,170                             |
| COATTNK2                  | Coating Color Preparation Storage Tank #2        | 3,170                             |
| COATTNK3                  | Coating Color Preparation Storage Tank #3        | 3,170                             |
| COATTNK4                  | Coating Color Preparation Storage Tank #4        | 3,170                             |
| COATTNK5                  | Coating Color Preparation Storage Tank #5        | 3,170                             |
| COATTNK6                  | Coating Color Preparation Storage Tank #6        | 3,170                             |
| CURCOAT                   | Curtain Coater Thickener Storage Tank            | 10,000                            |
| DRYERP                    | Dryer Passivation                                | 400                               |
| FUELTNK1                  | Diesel Tank for Fire Pump 1                      | 550                               |
| FUELTNK2                  | Diesel Tank for Fire Pump 2                      | 550                               |
| HYPOTNK                   | Bleach Bulk Storage Tank                         | 7,200                             |
| LXTNK1                    | Latex Storage Tank #1                            | 26,400                            |
| LXTNK2                    | Latex Storage Tank #2                            | 26,400                            |
| NAOHTNK                   | NaOH Storage Tank                                | 400                               |

**Table 1-2**  
**Tanks Not Listed on the Form OP-UA3**

| <b>Equipment/Group ID</b> | <b>Tank Description</b>                        | <b>Equipment Volume (gallons)</b> |
|---------------------------|--|-----------------------------------|
| NH3TNK                    | Ammonia Storage Tank                           | 21,000                            |
| OCOATFTNK1                | OptiCoat Layer Feed Tank #1                    | 600                               |
| OCOATFTNK2                | OptiCoat Layer Feed Tank #2                    | 600                               |
| OCOATTNK1                 | OptiCoat Layer Machine Tank #1                 | 420                               |
| OCOATTNK2                 | OptiCoat Layer Machine Tank #2                 | 420                               |
| RTNTNK1                   | Retention Aid Dissolving Tank                  | 2,900                             |
| RTNTNK2                   | Retention Aid Polymer (CPAM Storage Tank)      | 6,500                             |
| SDTNK                     | Starch Dissolving Tank                         | 158                               |
| SILICATNK1                | Silica Drainage Aid (Silica Bulk Storage Tank) | 6,500                             |
| SILICATNK2                | Silica Drainage Aid (Silica Bulk Storage Tank) | 6,500                             |
| STCKTNK                   | Stickies/Pitch Control Bulk Tank               | 6,500                             |
| SURFSTNK                  | Surfactant Storage Tank                        | 400                               |
| TIOTNK                    | Coating TiO2 Storage Tank                      | 10,000                            |

Form OP-REQ2 has been included to document negative applicability of certain rules to emissions units at the Waco Mill. Form OP-REQ3 has been included to document the detailed citations associated with each emissions unit at the Facility. Tables 1a and 1b of the Form OP-REQ3 in Section 6.0 show the applicable requirements for all emissions units.

As part of the preparation of this initial application, GPI reviewed applicability of compliance assurance monitoring (CAM) and periodic monitoring as these requirements relate to the emissions units at the Mill. Based on this review, it was determined that CAM is applicable to the Starch Silo (Unit ID: STARCH) and periodic monitoring is applicable to the Paper Machine (Unit ID: PM01), Turbine and Turbine Bypass (Unit IDs: TURBINE, BYPASS), and the cooling tower (Unit ID: COOLINGTWR). Form OP-MON has been provided in Section 7.0 for each source where either CAM or periodic monitoring is applicable.

For all initial SOP applications, the applicant is required to submit a Public Involvement Plan (PIP) Form to determine if additional public outreach is necessary. A PIP is required for applicants that will have significant public interest and located in specific geographical locations. The Facility is located in Waco



which is not one of the geographical locations; therefore, a PIP is not required. A PIP Form has been provided in Section 2.0.



## **2. IDENTIFYING AND ADMINISTRATIVE INFORMATION**

This section contains identifying and administrative information for the Waco Mill. The following forms are included in this section:

- OP-1: Site Information Summary
- OP-SUM: Individual Unit Summary
- OP-PBRSUP: Permit By Rule Supplemental Table
- Public Involvement Plan

**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> |   |
| <b>A.</b>                                 | Company Name: <i>Graphic Packaging International, LLC</i>   |
| <b>B.</b>                                 | Customer Reference Number (CN): <i>CN601710460</i>  |
| <b>C.</b>                                 | Submittal Date (mm/dd/yyyy): <i>08/9/2024</i>   |
| <b>II. Site Information</b>               |   |
| <b>A.</b>                                 | Site Name: <i>Graphic Packaging International Waco Mill</i>   |
| <b>B.</b>                                 | Regulated Entity Reference Number (RN): <i>RN111634507</i>  |
| <b>C.</b>                                 | 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   |
| <b>D.</b>                                 | Indicate all pollutants for which the site is a major source based on the site's potential to emit:<br><i>(Check the appropriate box[es].)</i>  |
|   | <input type="checkbox"/> VOC <input type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> CO <input type="checkbox"/> Pb <input checked="" type="checkbox"/> HAPS |
|   | Other:  |
| <b>E.</b>                                 | Is the site a non-major source subject to the Federal Operating Permit Program? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO   |
| <b>F.</b>                                 | Is the site within a local program area jurisdiction? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO   |
| <b>G.</b>                                 | Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO  |
| <b>H.</b>                                 | Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:   |
| <b>III. Permit Type</b>                   |   |
| <b>A.</b>                                 | 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>   |   |
| A. Is this submittal an abbreviated or a full application?   | <input type="checkbox"/> Abbreviated <input checked="" type="checkbox"/> Full |
| B. If this is a full application, is the submittal a follow-up to an abbreviated application?  | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO           |
| C. If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit?  | <input type="checkbox"/> YES <input type="checkbox"/> NO                      |
| D. Has an electronic copy of this application been submitted (or is being submitted) to EPA?<br>(Refer to the form instructions for additional information.) | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO           |
| E. Has the required Public Involvement Plan been included with this application?   | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO           |
| <b>V. Confidential Information</b>   |   |
| A. Is confidential information submitted in conjunction with this application?   | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO           |
| <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: <i>Joseph Tomon</i>  |   |
| RO Title: <i>Mill Manager</i>  |   |
| Employer Name: <i>Graphic Packaging International, LLC</i>   |   |
| Mailing Address: <i>301 Sheehy Parkway</i>   |   |
| City: <i>Waco</i>  |   |
| State: <i>Texas</i>  |   |
| ZIP Code: <i>76712</i>   |   |
| Territory:   |   |
| Country:   |   |
| Foreign Postal Code:   |   |
| Internal Mail Code:  |   |
| Telephone No.: <i>296-666-1478</i>   |   |
| Fax No.:   |   |
| Email: <i>joseph.tomon@graphicpkg.com</i>  |   |

**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><i>Furqan Shaikh</i></b>  |
| Technical Contact Title: <b><i>Director, Corporate HSE</i></b>  |
| Employer Name: <b><i>Graphic Packaging International, LLC</i></b>   |
| Mailing Address: <b><i>1500 Riveredge Parkway NW</i></b>  |
| City: <b><i>Atlanta</i></b>   |
| State: <b><i>Georgia</i></b>  |
| ZIP Code: <b><i>30328</i></b>   |
| Territory:  |
| Country:  |
| Foreign Postal Code:  |
| Internal Mail Code:   |
| Telephone No.: <b><i>470-792-5469</i></b>   |
| Fax No.:  |
| Email: <b><i>Furqan.Shaikh@graphicpkg.com</i></b>   |
| <b>VIII. Reference Only Requirements</b> <i>(For reference only.)</i>   |
| <b>A.</b> State Senator: <b><i>Brian Birdwell</i></b>   |
| <b>B.</b> State Representative: <b><i>Charles Anderson</i></b>  |
| <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 type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A</span> |
| <b>D.</b> Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>   |
| <b>E.</b> Indicate the alternate language(s) in which public notice is required: <b><i>Spanish</i></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><br><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: <i>Graphic Packaging International Waco Mill</i>  |
| B. Physical Address: <i>301 Sheehy Parkway</i>  |
| City: <i>Waco</i>   |
| State: <i>Texas</i>   |
| ZIP Code: <i>76712</i>  |
| C. Physical Location:   |
|   |
|   |
|   |
| D. Nearest City:  |
| E. State:   |
| F. ZIP Code:  |

**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): <i>31 28 13.871 N</i>   |
| <b>H.</b> Longitude (nearest second): <i>-97 11 11.953 W</i>   |
| <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: <i>10</i>   |
| <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><br><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: <i>Hewitt Public Library</i>  |
| <b>B.</b> Physical Address: <i>200 Patriot Ct</i>  |
| City: <i>Hewitt</i>  |
| ZIP Code: <i>76643</i>   |
| <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: <i>Furqan Shaikh</i>   |
| Contact Mailing Address: <i>1500 Riveredge Parkway NW</i>  |
| City: <i>Atlanta</i>   |
| State: <i>Georgia</i>  |
| ZIP Code: <i>30328</i>   |
| Territory:   |
| Country:   |
| Foreign Postal Code:   |
| Internal Mail Code:  |
| Telephone No.: <i>470-792-5469</i>   |

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

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

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

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

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

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

ADR Full Name:

ADR Title:

Employer Name:

Mailing Address:

City:

State:

ZIP Code:

Territory:

Country:

Foreign Postal Code:

Internal Mail Code:

Telephone No.:

Fax No.:

Email:

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

| Date     | Permit No. | Regulated Entity No. |
|----------|------------|----------------------|
| 8/9/2024 | TBA        | RN111634507          |

| Unit/Process ID No. | Applicable Form | Unit Name/Description                      | CAM | Preconstruction Authorizations 30 TAC Chapter 116/30 TAC Chapter 106 | Preconstruction Authorizations Title I | Group ID No.. |
|---------------------|-----------------|--|-----|--|--|---------------|
| BOILER1             | OP-UA6          | BOILER NO. 1                               |     | 171518   | N/A                                    | N/A           |
| BYPASS              | OP-UA15         | TURBINE BYPASS STACK                       |     | 171518   | N/A                                    | N/A           |
| COOLINGTWR          | OP-UA15         | COOLING TOWER NO. 1                        |     | 171518   | N/A                                    | N/A           |
| HRSG                | OP-UA6          | HEAT RECOVERY STEAM GENERATING UNIT        |     | 171518   | N/A                                    | N/A           |
| FIREPUMP1           | OP-UA2          | FIRE PUMP (DIESEL)                         |     | 30 TAC 106.511   | N/A                                    | N/A           |
| FIREPUMP2           | OP-UA2          | FIRE PUMP (DIESEL)                         |     | 30 TAC 106.511   | N/A                                    | N/A           |
| PM                  | OP-REQ2         | PAPER MACHINE                              |     | 171518   | N/A                                    | N/A           |
| PMFEASV             | OP-UA15         | PAPER MACHINE FORMER EXHAUST AIR FAN STACK |     | 171518   | N/A                                    | N/A           |
| STARCH              | OP-UA15         | STARCH SILO                                | X   | 171518   | N/A                                    | N/A           |
| TURBINE             | OP-UA11         | TURBINE                                    |     | 171518   | N/A                                    | N/A           |
| TURBINEV            | OP-UA15         | TURBINE STACK                              |     | 171518   | N/A                                    | N/A           |

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

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

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

| Date       | Permit Number | Regulated Entity Number |
|------------|---------------|-------------------------|
| 08/09/2024 | TBA           | RN111634507             |

| Unit ID No. | PBR No. | Version No./Date |
|-------------|---------|------------------|
| BIOTNK      | 106.472 | 09/04/2000       |
| BLCHTNK     | 106.472 | 09/04/2000       |
| BLDCOAT     | 106.472 | 09/04/2000       |
| CAUSTNK     | 106.472 | 09/04/2000       |
| CBSTNK      | 106.472 | 09/04/2000       |
| CDESTNK     | 106.472 | 09/04/2000       |
| CDISTNK     | 106.472 | 09/04/2000       |
| CLAYTNK1    | 106.472 | 09/04/2000       |
| CLAYTNK2    | 106.472 | 09/04/2000       |
| CLAYTNK3    | 106.472 | 09/04/2000       |
| CLAYTNK4    | 106.472 | 09/04/2000       |
| COATTNK1    | 106.472 | 09/04/2000       |

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

| Date       | Permit Number | Regulated Entity Number |
|------------|---------------|-------------------------|
| 08/09/2024 | TBA           | RN111634507             |

| Unit ID No. | PBR No. | Version No./Date |
|-------------|---------|------------------|
| COATTNK2    | 106.472 | 09/04/2000       |
| COATTNK3    | 106.472 | 09/04/2000       |
| COATTNK4    | 106.472 | 09/04/2000       |
| COATTNK5    | 106.472 | 09/04/2000       |
| COATTNK6    | 106.472 | 09/04/2000       |
| CURCOAT     | 106.472 | 09/04/2000       |
| DRYERP      | 106.472 | 09/04/2000       |
| FIREPUMP1   | 106.511 | 09/04/2000       |
| FIREPUMP2   | 106.511 | 09/04/2000       |
| FUELTK1     | 106.472 | 09/04/2000       |
| FUELTK2     | 106.472 | 09/04/2000       |
| HYPOTNK     | 106.472 | 09/04/2000       |
| LTXTK1      | 106.472 | 09/04/2000       |
| LTXTK2      | 106.472 | 09/04/2000       |

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

| Date       | Permit Number | Regulated Entity Number |
|------------|---------------|-------------------------|
| 08/09/2024 | TBA           | RN111634507             |

| Unit ID No. | PBR No. | Version No./Date |
|-------------|---------|------------------|
| NAOHTNK     | 106.472 | 09/04/2000       |
| NH3TNK      | 106.472 | 09/04/2000       |
| OCOATFTNK1  | 106.472 | 09/04/2000       |
| OCOATFTNK2  | 106.472 | 09/04/2000       |
| OCOATTNK1   | 106.472 | 09/04/2000       |
| OCOATTNK2   | 106.472 | 09/04/2000       |
| RTNTNK1     | 106.472 | 09/04/2000       |
| RTNTNK2     | 106.472 | 09/04/2000       |
| SDTNK       | 106.472 | 09/04/2000       |
| SILICATNK1  | 106.472 | 09/04/2000       |
| SILICATNK2  | 106.472 | 09/04/2000       |
| STCKTNK     | 106.472 | 09/04/2000       |
| SURFSTNK    | 106.472 | 09/04/2000       |
| TIOTNK      | 106.472 | 09/04/2000       |

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

| Date      | Permit Number | Regulated Entity Number |
|-----------|---------------|-------------------------|
| 08/9/2024 | TBA           | RN111634507             |

| Unit ID No. | PBR No. | Version No./Date Or Registration No. | Monitoring Requirement                                 |
|-------------|---------|--------------------------------------|--|
| BIOTNK      | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| BLCHTNK     | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| BLDCOAT     | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| CAUSTNK     | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| CBSTNK      | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| CDESTNK     | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| CDISTNK     | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| CLAYTNK1    | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| CLAYTNK2    | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| CLAYTNK3    | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| CLAYTNK4    | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| COATTNK1    | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| COATTNK2    | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |

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

| Date      | Permit Number | Regulated Entity Number |
|-----------|---------------|-------------------------|
| 08/9/2024 | TBA           | RN111634507             |

| Unit ID No. | PBR No. | Version No./Date Or Registration No. | Monitoring Requirement                                 |
|-------------|---------|--------------------------------------|--|
| COATTNK3    | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| COATTNK4    | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| COATTNK5    | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| COATTNK6    | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| CURCOAT     | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| DRYERP      | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| FIREPUMP1   | 106.511 | 09/04/2000                           | Recording monthly operating hours.                     |
| FIREPUMP2   | 106.511 | 09/04/2000                           | Recording monthly operating hours.                     |
| FUELTK1     | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| FUELTK2     | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| HYPOTNK     | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| LTXTNK1     | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| LTXTNK2     | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| NAOHTNK     | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |

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

| Date      | Permit Number | Regulated Entity Number |
|-----------|---------------|-------------------------|
| 08/9/2024 | TBA           | RN111634507             |

| Unit ID No. | PBR No. | Version No./Date Or Registration No. | Monitoring Requirement                                 |
|-------------|---------|--------------------------------------|--|
| NH3TNK      | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| OCOATFTNK1  | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| OCOATFTNK2  | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| OCOATTNK1   | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| OCOATTNK2   | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| RTNTNK1     | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| RTNTNK2     | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| SDTNK       | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| SILICATNK1  | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| SILICATNK2  | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| STCKTNK     | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| SURFSTNK    | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |
| TIOTNK      | 106.472 | 09/04/2000                           | Recording monthly usage/purchase records for the Mill. |



Texas Commission on Environmental Quality

## Public Involvement Plan Form for Permit and Registration Applications

The Public Involvement Plan is intended to provide applicants and the agency with information about how public outreach will be accomplished for certain types of applications in certain geographical areas of the state. It is intended to apply to new activities; major changes at existing plants, facilities, and processes; and to activities which are likely to have significant interest from the public. This preliminary screening is designed to identify applications that will benefit from an initial assessment of the need for enhanced public outreach.

All applicable sections of this form should be completed and submitted with the permit or registration application. For instructions on how to complete this form, see TCEQ-20960-inst.

### Section 1. Preliminary Screening

- New Permit or Registration Application  
 New Activity - modification, registration, amendment, facility, etc. (see instructions)

**If neither of the above boxes are checked, completion of the form is not required and does not need to be submitted.**

### Section 2. Secondary Screening

- Requires public notice,  
 Considered to have significant public interest, **and**  
 Located within any of the following geographical locations:

- Austin
- Dallas
- Fort Worth
- Houston
- San Antonio
- West Texas
- Texas Panhandle
- Along the Texas/Mexico Border
- Other geographical locations should be decided on a case-by-case basis

**If all the above boxes are not checked, a Public Involvement Plan is not necessary.  
Stop after Section 2 and submit the form.**

- Public Involvement Plan not applicable to this application. Provide **brief** explanation.

The Waco Mill is located in Waco, TX which is not in one of the above locations.

### Section 3. Application Information

#### Type of Application (check all that apply):

Air  Initial  Federal  Amendment  Standard Permit  Title V

Waste  Municipal Solid Waste  Industrial and Hazardous Waste  Scrap Tire  
 Radioactive Material Licensing  Underground Injection Control

#### Water Quality

- Texas Pollutant Discharge Elimination System (TPDES)
  - Texas Land Application Permit (TLAP)
  - State Only Concentrated Animal Feeding Operation (CAFO)
  - Water Treatment Plant Residuals Disposal Permit
- Class B Biosolids Land Application Permit
- Domestic Septage Land Application Registration

#### Water Rights New Permit

- New Appropriation of Water
- New or existing reservoir

#### Amendment to an Existing Water Right

- Add a New Appropriation of Water
- Add a New or Existing Reservoir
- Major Amendment that could affect other water rights or the environment

### Section 4. Plain Language Summary

Provide a brief description of planned activities.

## Section 5. Community and Demographic Information

Community information can be found using EPA's EJ Screen, U.S. Census Bureau information, or generally available demographic tools.

**Information gathered in this section can assist with the determination of whether alternative language notice is necessary. Please provide the following information.**

(City)

(County)

(Census Tract)

Please indicate which of these three is the level used for gathering the following information.

City

County

Census Tract

(a) Percent of people over 25 years of age who at least graduated from high school

(b) Per capita income for population near the specified location

(c) Percent of minority population and percent of population by race within the specified location

(d) Percent of Linguistically Isolated Households by language within the specified location

(e) Languages commonly spoken in area by percentage

(f) Community and/or Stakeholder Groups

(g) Historic public interest or involvement

## Section 6. Planned Public Outreach Activities

(a) Is this application subject to the public participation requirements of Title 30 Texas Administrative Code (30 TAC) Chapter 39?

Yes  No

(b) If yes, do you intend at this time to provide public outreach other than what is required by rule?

Yes  No

If Yes, please describe.

**If you answered "yes" that this application is subject to 30 TAC Chapter 39, answering the remaining questions in Section 6 is not required.**

(c) Will you provide notice of this application in alternative languages?

Yes  No

**Please refer to Section 5. If more than 5% of the population potentially affected by your application is Limited English Proficient, then you are required to provide notice in the alternative language.**

If yes, how will you provide notice in alternative languages?

- Publish in alternative language newspaper
- Posted on Commissioner's Integrated Database Website
- Mailed by TCEQ's Office of the Chief Clerk
- Other (specify)

(d) Is there an opportunity for some type of public meeting, including after notice?

Yes  No

(e) If a public meeting is held, will a translator be provided if requested?

Yes  No

(f) Hard copies of the application will be available at the following (check all that apply):

- TCEQ Regional Office  TCEQ Central Office
- Public Place (specify)

## Section 7. Voluntary Submittal

For applicants voluntarily providing this Public Involvement Plan, who are not subject to formal public participation requirements.

Will you provide notice of this application, including notice in alternative languages?

Yes  No

What types of notice will be provided?

- Publish in alternative language newspaper
- Posted on Commissioner's Integrated Database Website
- Mailed by TCEQ's Office of the Chief Clerk
- Other (specify)

### **3. RESPONSIBLE OFFICIAL CERTIFICATION**

This section contains certification requirements of this Application for the Waco Mill. Form OP-CRO1:  
Certification by Responsible Official is included in this section

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

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

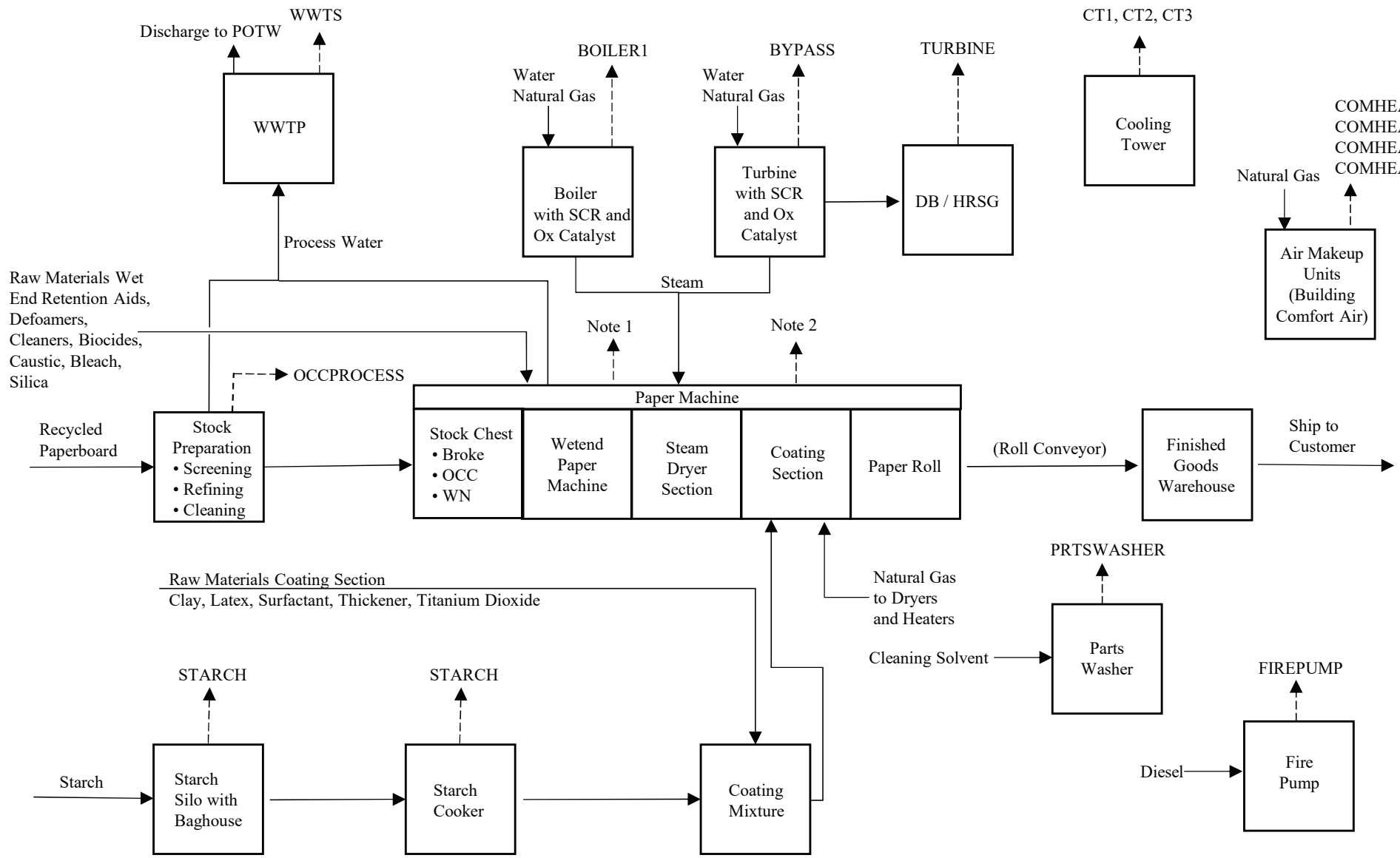
|  |   |                         |
|--|---|-------------------------|
| <b>I. Identifying Information</b>  |   |                         |
| RN: <i>RN111634507</i>   | CN: <i>CN601710460</i>  | Account No.: <i>TBA</i> |
| Permit No.: <i>TBA</i>   | Project No.: <i>TBA</i>   |                         |
| Area Name: <i>Graphic Packaging International Waco Mill</i>  | Company Name: <i>Graphic Packaging International, LLC</i>       |                         |
| <b>II. Certification Type</b> <i>(Please mark the appropriate box)</i>   |   |                         |
| <input checked="" type="checkbox"/> Responsible Official   | <input type="checkbox"/> Duly Authorized Representative         |                         |
| <b>III. Submittal Type</b> <i>(Please mark the appropriate box) (Only one response can be accepted per form)</i>   |   |                         |
| <input checked="" type="checkbox"/> SOP/TOP Initial Permit Application   | <input type="checkbox"/> Update to Permit Application           |                         |
| <input type="checkbox"/> GOP Initial Permit Application  | <input type="checkbox"/> Permit Revision, Renewal, or Reopening |                         |
| <input type="checkbox"/> Other: _____  |   |                         |
| <b>IV. Certification of Truth</b>  |   |                         |
| <p><b>This certification does not extend to information which is designated by the TCEQ as information for reference only.</b></p> <p>I, <u><i>Joseph Tomon</i></u> certify that I am the <u><i>RO</i></u><br/> <i>(Certifier Name printed or typed)</i> <span style="float: right;"><i>(RO or DAR)</i></span></p> <p>and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:</p> <p><i>Note: Enter Either a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i></p> <p>Time Period: From _____ to _____<br/> <span style="margin-left: 150px;"><i>Start Date</i></span> <span style="margin-left: 150px;"><i>End Date</i></span></p> <p>Specific Dates: <u><i>08/09/2024</i></u> _____ _____ _____ _____ _____ _____<br/> <span style="margin-left: 100px;"><i>Date 1</i></span> <span style="margin-left: 100px;"><i>Date 2</i></span> <span style="margin-left: 100px;"><i>Date 3</i></span> <span style="margin-left: 100px;"><i>Date 4</i></span> <span style="margin-left: 100px;"><i>Date 5</i></span> <span style="margin-left: 100px;"><i>Date 6</i></span></p> <p>Signature: _____ Signature Date: _____</p> <p>Title: <u><i>Mill Manager</i></u></p> |   |                         |

#### **4. PROCESS DESCRIPTION**

The Waco Mill will be a recycle coated paperboard facility that takes in recycled paperboard, specifically old, corrugated containers (OCC) and internally sourced secondary fiber. In the Secondary Fiber/OCC Processing Area, incoming recycled fiber is added to three pulpers with water and mechanically broken down to produce fibers. The fibers are then screened and cleaned to remove debris and contaminants, combined with wet end additives and diluted at the headbox of the paper machine, then applied to the wire where it forms a sheet. The resultant paperboard is initially dried with steam. Steam for the paper machine is supplied by one natural gas-fired Boiler (Unit ID: BOILER1) and one natural gas-fired combustion Turbine with a Duct Burner/Heat Recovery Steam Generator (Unit ID: TURBINE). Selective catalytic reduction is utilized to reduce nitrogen oxide (NO<sub>x</sub>) emissions from both the Boiler and Turbine. The Turbine is also equipped with a Heat Recovery Steam Generator that generates power for the Mill and provides steam to the Paper Machine (Unit ID: PM01). The paper machine is equipped with six natural gas-fired dryers and one infrared dryer that removes any remaining water after dry end additives are introduced. The dryers do not meet the criteria to be listed individually in the final SOP and therefore have not been included on the Form OP-SUM or any individual unit attribute forms. The paper machine includes several atmospheric vents that release vapor from the evaporation of water from the sheet. The paper machine vents are also not listed individually on Form OP-SUM, with the exception of the Paper Machine Former Exhaust Air Fan Vent (Unit ID: PMFEASV), which is included there due to its inclusion on form OP-UA15.

Additional equipment, including several “off-permit” tanks identified in Table 1-2, two calendar heaters, a four-celled cooling tower (Unit ID: COOLINGTWR), a starch silo (Unit ID: STARCH), two diesel-fired fire pumps (Unit ID FIREPUMP1 and FIREPUMP2), a small wastewater pre-treatment system, and parts washers are onsite to supplement the process. The Mill has paved roadways throughout the property as well. Emissions units and regulatory applicability can be found in the

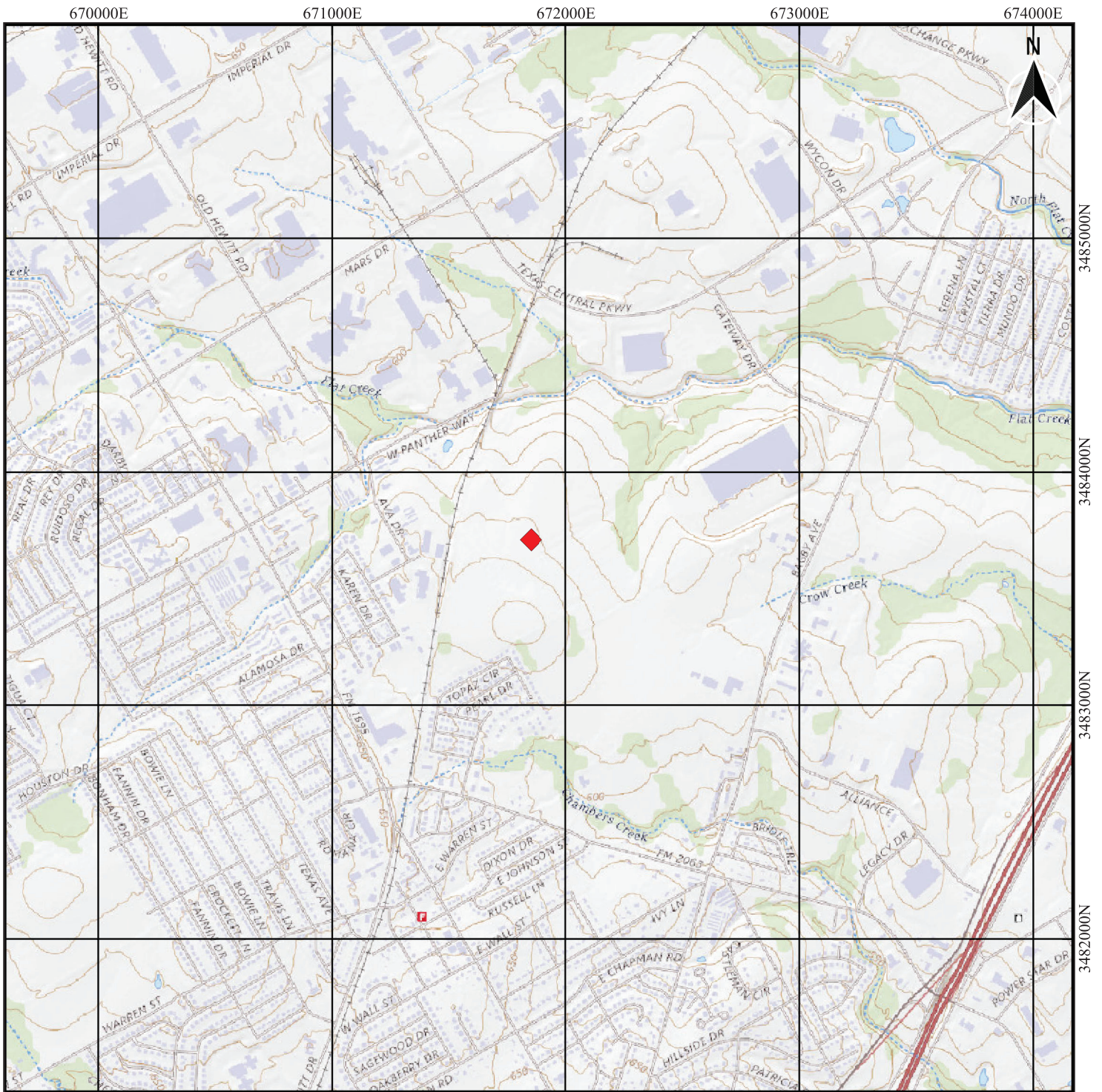
various applicable forms throughout this application. Figures 4-1, 4-2, and 4-3 include a process flow diagram, area map, and plot plan respectively.



<sup>1</sup>PM01, PM02, PM03, PM04, PM05, PM06, PMWET1, PMWET2, PMWET3, PMWET4, PM11, PM12, PM13, PM14, PM15, PM16, HEATER1, HEATER2  
<sup>2</sup>DRYER1A, DRYER1B, DRYER2, DRYER3, DRYER4, DRYER5, DRYER6, DRYER7, PM31, PM32

Figure 4-1  
 Process Flow Diagram

Graphic Packaging International, LLC  
 Waco, Texas



**Legend**

◆ Facility Location

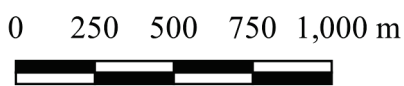


Figure 4-2  
Facility Location Map

Graphic Packaging International,  
LLC  
Waco, TX

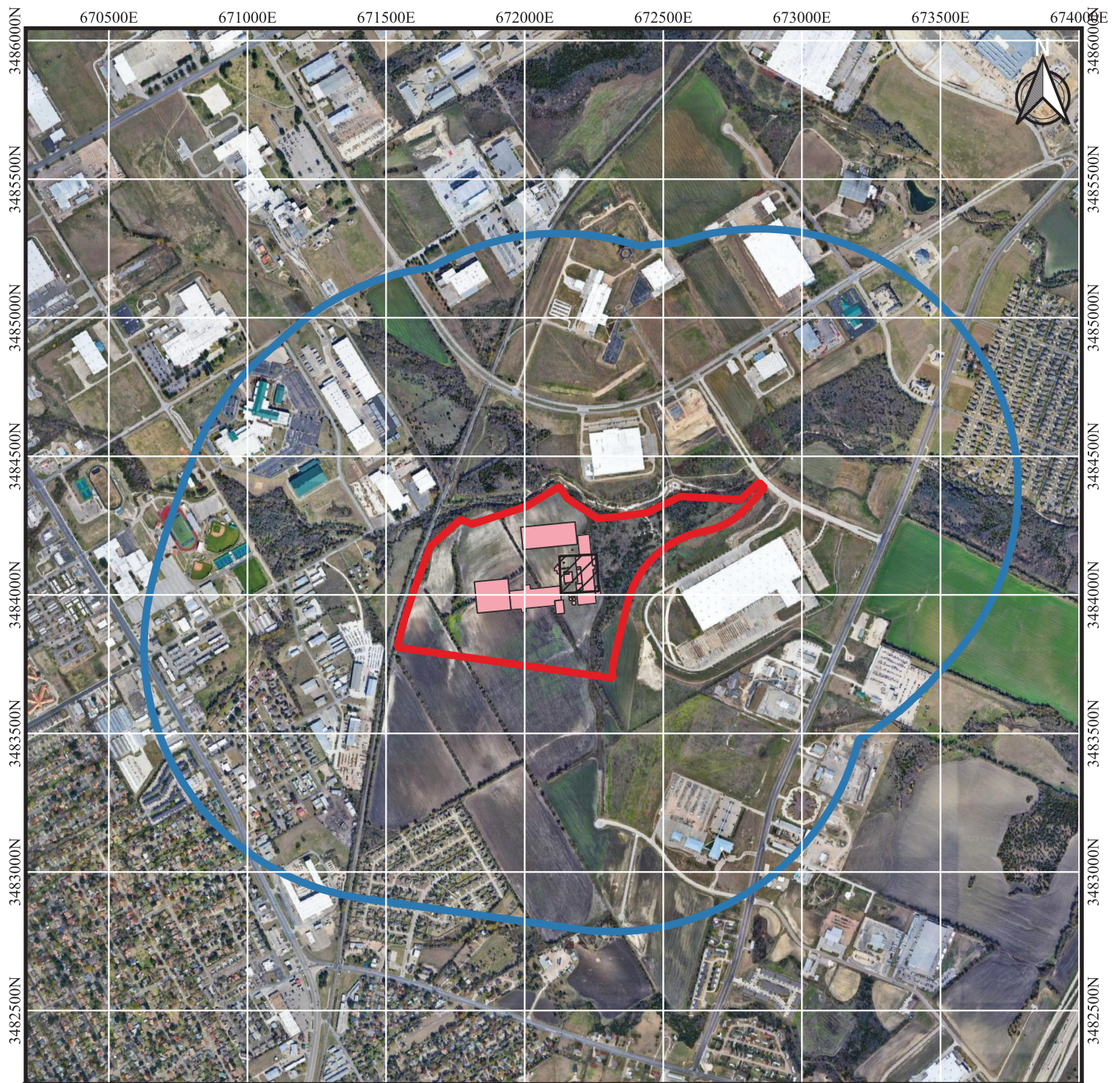
DRAWN BY: **W.H.**

CHECKED BY: **A.R.**

DATE CREATED: **December 2022**

PROJ NO.: **01726-0013**





**Legend**

- Buildings and Downwash Structures
- Inset
- Property Boundary
- 3,000 feet from Property Boundary

0      300      600      900      1,200 m



Figure 4-3  
Plot Plan - Property Boundary

Graphic Packaging International,  
LLC  
Waco, TX

DRAWN BY: **W.H.**

CHECKED BY: **A.R.**

DATE CREATED:  
**December 2022**

PROJ NO.:  
**01726-0013**



## **5. UNIT ATTRIBUTE INFORMATION**

This section contains the applicable unit attribute forms to document regulatory applicability. The following forms are included in this section:

- OP-UA2: Stationary Reciprocating Internal Combustion Engine Attributes
- OP-UA6: Boiler/Steam Generator/Steam Generating Unit Attributes
- OP-UA11: Stationary Turbine Attributes
- OP-UA15: Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes

**Stationary Reciprocating Internal Combustion Engine Attributes  
Form OP-UA2  
(Page 4)**

**Federal Operating Permit Program**

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

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

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 08/09/2024 | TBA        | RN111634507          |

| Unit ID No. | SOP/GOP Index No. | HAP Source | Brake HP | Construction/<br>Reconstruction<br>Date | Nonindustrial<br>Emergency<br>Engine | Service Type | Stationary RICE<br>Type |
|-------------|-------------------|------------|----------|---|--------------------------------------|--------------|-------------------------|
| FIREPUMP1   | 63ZZZZ-1          | MAJOR      | 500+     | 06+                                     |                                      | EMER-A       |                         |
| FIREPUMP2   | 63ZZZZ-1          | MAJOR      | 500+     | 06+                                     |                                      | EMER-A       |                         |
|             |                   |            |          |   |                                      |              |                         |
|             |                   |            |          |   |                                      |              |                         |
|             |                   |            |          |   |                                      |              |                         |
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|             |                   |            |          |   |                                      |              |                         |
|             |                   |            |          |   |                                      |              |                         |

TCEQ-10003 (APD-ID 28v2.0, Revised 11/22) OP-UA2  
This form is for use by facilities subject to air quality permit requirements and may be revised periodically. (Title V Release 11/22)

**Stationary Reciprocating Internal Combustion Engine Attributes  
 Form OP-UA2 (Page 10)  
 Federal Operating Permit Program  
 Table 5a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)  
 Subpart III: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines  
 Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 08/09/2024 | TBA        | RN111634507          |

| Unit ID No. | SOP/GOP Index No. | Applicability Date | Exemptions | Service | Commencing | Manufacture Date |
|-------------|-------------------|--------------------|------------|---------|------------|------------------|
| FIREPUMP1   | 60III-1           | 2005+              | NONE       | FIRE    | CON        | 0706+            |
| FIREPUMP2   | 60III-1           | 2005+              | NONE       | FIRE    | CON        | 0706+            |
|             |                   |                    |            |         |            |                  |
|             |                   |                    |            |         |            |                  |
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|             |                   |                    |            |         |            |                  |

**Stationary Reciprocating Internal Combustion Engine Attributes**  
**Form OP-UA2 (Page 11)**  
**Federal Operating Permit Program**  
**Table 5b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**  
**Subpart III: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 08/09/2024 | TBA        | RN111634507          |

| Unit ID No. | SOP/GOP Index No. | Diesel | AES No. | Displacement | Generator Set | Model Year | Install Date |
|-------------|-------------------|--------|---------|--------------|---------------|------------|--------------|
| FIREPUMP1   | 60III-1           | DIESEL |         | 10-          |               | 2017+      |              |
| FIREPUMP2   | 60III-1           | DIESEL |         | 10-          |               | 2017+      |              |
|             |                   |        |         |              |               |            |              |
|             |                   |        |         |              |               |            |              |
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|             |                   |        |         |              |               |            |              |



**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  
Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 08/09/2024 | TBA        | RN111634507          |

| Unit ID No. | SOP Index No. | Construction/Modification Date | Heat Input Capacity | Subpart Da | Changes to Existing Affected Facility | Subpart Ea, Eb, or AAAA | Subpart KKKK | Subpart Cb or BBBB |
|-------------|---------------|--------------------------------|---------------------|------------|---------------------------------------|-------------------------|--------------|--------------------|
| BOILER1     | 60Db-1        | 05+CR                          | 250+                | NO         | NO                                    | NO                      | NO           | NO                 |
|             |               |                                |                     |            |                                       |                         |              |                    |
|             |               |                                |                     |            |                                       |                         |              |                    |
|             |               |                                |                     |            |                                       |                         |              |                    |
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**Boiler/Steam Generator/Steam Generating Unit Attributes**  
**Form OP-UA6 (Page 7)**  
**Federal Operating Permit Program**  
**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**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 08/09/2024 | TBA        | RN111634507          |

| Unit ID No. | SOP Index No. | D-Series Fuel Type | D-Series Fuel Type | D-Series Fuel Type | Subpart D | Subpart J | Subpart E | ACF Option SO <sub>2</sub> | ACF Option PM | ACF Option NO <sub>x</sub> |
|-------------|---------------|--------------------|--------------------|--------------------|-----------|-----------|-----------|----------------------------|---------------|----------------------------|
| BOILER1     | 60Db-1        | NG                 |                    |                    |           | NO        | NO        | OTHR                       | OTHR          | F10-NG                     |
|             |               |                    |                    |                    |           |           |           |                            |               |                            |
|             |               |                    |                    |                    |           |           |           |                            |               |                            |
|             |               |                    |                    |                    |           |           |           |                            |               |                            |
|             |               |                    |                    |                    |           |           |           |                            |               |                            |
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|             |               |                    |                    |                    |           |           |           |                            |               |                            |

**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**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 08/09/2024 | TBA        | RN111634507          |

| Unit ID No. | SOP Index No. | 60.42b (k)(2) Low Sulfur Exemption | 60.42b (k)(4) Alternative | Post-Combustion Control | 60.43b(h)(2) Alternative | Electrical or Mechanical Output | Output Based Limit | Steam with Electricity | Electricity Only | 60.49 Da(n) Alternative | 60.49 Da(m) Alternative |
|-------------|---------------|------------------------------------|---------------------------|-------------------------|--------------------------|---------------------------------|--------------------|------------------------|------------------|-------------------------|-------------------------|
| BOILER1     | 60Db-1        | YES                                |                           |                         |                          | NO                              |                    |                        |                  | NO                      | NO                      |
|             |               |                                    |                           |                         |                          |                                 |                    |                        |                  |                         |                         |
|             |               |                                    |                           |                         |                          |                                 |                    |                        |                  |                         |                         |
|             |               |                                    |                           |                         |                          |                                 |                    |                        |                  |                         |                         |
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|             |               |                                    |                           |                         |                          |                                 |                    |                        |                  |                         |                         |

**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**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 08/09/2024 | TBA        | RN111634507          |

| Unit ID No. | SOP Index No. | Residual Oil Sampling | Monitoring Type PM | Monitoring Type Opacity | Monitoring Type NO <sub>x</sub> | Monitoring Type SO <sub>2</sub> | Technology Type | Unit Type | Heat Release Rate | Heat Input Gas/Oil | Heat Input Wood | Fuel Heat Input |
|-------------|---------------|-----------------------|--------------------|-------------------------|---------------------------------|---------------------------------|-----------------|-----------|-------------------|--------------------|-----------------|-----------------|
| BOILER1     | 60Db-1        |                       | NONE               | NONE                    | CEM                             | FLCRT                           | NONE            | OTHER     | NGHIGH            |                    |                 |                 |
|             |               |                       |                    |                         |                                 |                                 |                 |           |                   |                    |                 |                 |
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**Boiler/Steam Generator/Steam Generating Unit Attributes**  
**Form OP-UA6 (Page 10)**  
**Federal Operating Permit Program**  
**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**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 08/09/2024 | TBA        | RN111634507          |

| Unit ID No. | SOP Index No. | Alternate Emission Limit (AEL) | AEL ID. NO. | Facility Type | Monitoring Device | Common Fuel Source |
|-------------|---------------|--------------------------------|-------------|---------------|-------------------|--------------------|
| BOILER1     | 60Db-1        |                                |             |               |                   |                    |
|             |               |                                |             |               |                   |                    |
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**Boiler/Steam Generator/Steam Generating Unit Attributes**  
**Form OP-UA6 (Page 37)**  
**Federal Operating Permit Program**  
**Table 14a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)**  
**Subpart DDDDD: Industrial, Commercial, and Institutional Boilers**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 08/09/2024 | TBA        | RN111634507          |

| Unit ID No. | SOP/GOP Index No. | Commence | Table Applicability | HCI Emission | HCI-CMS |
|-------------|-------------------|----------|---------------------|--------------|---------|
| BOILER1     | 63DDDDDD-1        | NEW      | T3.3G1              |              |         |
| HRSG        | 63DDDDDD-1        | NEW      | T3.1TS              |              |         |
|             |                   |          |                     |              |         |
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**Stationary Turbine Attributes  
Form OP-UA11  
(Page 11)**

**Federal Operating Permit Program**

**Table 5: Title 40 Code of Federal Regulations, Part 63 (40 CFR, Part 63)**

**Subpart YYYY: National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines  
Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 08/09/2024 | TBA        | RN111634507          |

| Unit ID No. | SOP Index No. | Construction/Reconstruction Date | Rated Peak Power Output | Type of Service | Fuel Fired | Turbine Combustion Process | Oxidation Catalyst | Alternate Limitations | Previous Performance Test | Distillate Oil Fired |
|-------------|---------------|----------------------------------|-------------------------|-----------------|------------|----------------------------|--------------------|-----------------------|---------------------------|----------------------|
| TURBINE     | 63YYYY-1      | 03+                              | 1+                      | NORM            | NG         | LNPMX                      | YES                |                       | NO                        | NO                   |
|             |               |                                  |                         |                 |            |                            |                    |                       |                           |                      |
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**Stationary Turbine Attributes**  
**Form OP-UA11 (Page 13)**  
**Federal Operating Permit Program**  
**Table 6b: Title 40 Code of Federal Regulations (40 CFR Part 60)**  
**Subpart KKKK: Stationary Combustion Turbines**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 08/09/2024 | TBA        | RN111634507          |

| Unit ID No. | SOP Index No. | 75% of Peak | 30 MW | Turbine Use | NO <sub>x</sub> Control | NO <sub>x</sub> Monitoring | Common Steam Header | Duct Burner |
|-------------|---------------|-------------|-------|-------------|-------------------------|----------------------------|---------------------|-------------|
| TURBINE     | 60KKKK-1      | NO          |       | ELCT        | NO                      | CEMS                       | CMN-                | YES         |
|             |               |             |       |             |                         |                            |                     |             |
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**Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes  
Form OP-UA15**

**(Page 1)**

**Federal Operating Permit Program**

**Table 1a: Title 30 Texas Administrative Code Chapter 111 (30 TAC Chapter 111)**

**Subchapter A: Visible Emissions**

**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 08/09/2024 | TBA        | RN111634507          |

| Emission Point ID No. <sup>1</sup> | SOP/GOP Index No. | Alternate Opacity Limitation | AOL ID No. | Vent Source        | Opacity Monitoring System | Construction Date | Effluent Flow Rate |
|------------------------------------|-------------------|------------------------------|------------|--------------------|---------------------------|-------------------|--------------------|
| BYPASS                             | R1111-1           | NO                           |            | OTHER              | NONE                      | 72+               | 100+               |
| COOLINGTWR                         | R1111-1           | NO                           |            | NOVIS <sup>2</sup> | NONE                      | 72+               | 100+               |
| PMFEASV                            | R1111-1           | NO                           |            | OTHER              | NONE                      | 72+               | 100+               |
| TURBINEV                           | R1111-1           | NO                           |            | OTHER              | NONE                      | 72+               | 100+               |
|                                    |                   |                              |            |                    |                           |                   |                    |
|                                    |                   |                              |            |                    |                           |                   |                    |
|                                    |                   |                              |            |                    |                           |                   |                    |

<sup>1</sup> GPI opted to only individually list vents that are greater than 100,000 acfm. For all other process vents, periodic monitoring requirements listed in the SOP will be used to comply with the opacity standard

<sup>2</sup> The cooling tower has been added due to flow rate of emissions and presence of particulates but is not capable of generating visible emissions. Therefore, GPI requests that it be added to the permit with the acknowledgment that it will not generate visible emissions and therefore no periodic monitoring will be required.

**Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes**  
**Form OP-UA15 (Page 2)**  
**Federal Operating Permit Program**  
**Table 1b: Title 30 Texas Administrative Code Chapter 111 (30 TAC Chapter 111)**  
**Subchapter A: Visible Emissions**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 08/09/2024 | TBA        | RN111634507          |

| Emission Point ID No. | SOP Index No. | Annual ACF | Heat Input | State Implementation Plan (SIP) Violation | Total Feed Capacity |
|-----------------------|---------------|------------|------------|---|---------------------|
| BYPASS                | R1111-1       |            |            |   |                     |
| COOLINGTWR            | R1111-1       |            |            |   |                     |
| PMFEASV               | R1111-1       |            |            |   |                     |
| TURBINE               | R1111-1       |            |            |   |                     |
|                       |               |            |            |   |                     |
|                       |               |            |            |   |                     |
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**Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes**  
**Form OP-UA15 (Page 40)**  
**Federal Operating Permit Program**  
**Table 15: Title 30 Texas Administrative Code Chapter 111 (30 TAC Chapter 111)**  
**Subchapter A, Division 5: Emission Limits on Nonagricultural Processes**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 08/09/2024 | TBA        | RN111634507          |

| Emission Point ID No. | SOP Index No. | Effective Stack Height |
|-----------------------|---------------|------------------------|
| STARCH                | R1151-1       | NO                     |
|                       |               |                        |
|                       |               |                        |
|                       |               |                        |
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## **6. APPLICABLE REQUIREMENT INFORMATION**

This section contains forms that document potentially applicable requirements. The following forms are included in this section:

- OP-REQ1: Application Area-Wide Applicability Determinations and General Information
- OP-REQ2: Negative Applicable Requirement Determinations
- OP-REQ3: Applicable Requirements Summary

**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.: | TBA         |
| RN No.:     | RN111634507 |

*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.<br><i>If the responses to Questions I.A.1 and I.A.2 are both "NO," go to Question I.A.6.<br/>If the response to Question I.A.1 is "NO" and the response to Question I.A.2 is "YES," go to Question I.A.4.</i> | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO                                 |
| ◆ 3. The application area is opting to comply with the requirements for stationary vents constructed after January 31, 1972 for vents in the application area constructed on or before January 31, 1972.  | <input type="checkbox"/> YES <input type="checkbox"/> NO  |
| ◆ 4. All stationary vents are addressed on a unit specific basis.   | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO                                 |
| ◆ 5. Test Method 9 (40 CFR Part 60, Appendix A, Method 9 - Visual Determination of the Opacity of Emissions from Stationary Sources) is used to determine opacity of emissions in the application area.   | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO                                 |
| ◆ 6. The application area includes structures subject to 30 TAC § 111.111(a)(7)(A).   | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO                                 |
| ◆ 7. The application area includes sources, other than those specified in 30 TAC § 111.111(a)(1), (4), or (7), subject to 30 TAC § 111.111(a)(8)(A).  | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO                                 |
| ◆ 8. Emissions from units in the application area include contributions from uncombined water.  | <input 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<br><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:       | 08/09/2024  |
| Permit No.: | TBA         |
| RN No.:     | RN111634507 |

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|  |   |
|--|---|
| <b>Form OP-REQ1: Page 2</b>  |   |
| <b>I. Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter (continued)</b>  |   |
| <b>B. Materials Handling, Construction, Roads, Streets, Alleys, and Parking Lots</b>   |   |
| 1. Items a - d determines applicability of any of these requirements based on geographical location.   |   |
| ◆ a. The application area is located within the City of El Paso.   | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| ◆ b. The application area is located within the Fort Bliss Military Reservation, except areas specified in 30 TAC § 111.141.   | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| ◆ c. The application area is located in the portion of Harris County inside the loop formed by Beltway 8.  | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| ◆ d. The application area is located in the area of Nueces County outlined in Group II state implementation plan (SIP) for inhalable particulate matter adopted by the TCEQ on May 13, 1988.             | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| <i>If there is any "YES" response to Questions I.B.1.a - d, answers Questions I.B.2.a - d. If all responses to Questions I.B.1.a-d are "NO," go to Section I.C.</i>                                      |   |
| 2. Items a - d determine the specific applicability of these requirements.   |   |
| ◆ a. The application area is subject to 30 TAC § 111.143.  | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| ◆ b. The application area is subject to 30 TAC § 111.145.  | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| ◆ c. The application area is subject to 30 TAC § 111.147.  | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| ◆ d. The application area is subject to 30 TAC § 111.149.  | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| <b>C. Emissions Limits on Nonagricultural Processes</b>  |   |
| ◆ 1. The application area includes a nonagricultural process subject to 30 TAC § 111.151.  | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| 2. The application area includes a vent from a nonagricultural process that is subject to additional monitoring requirements.<br><i>If the response to Question I.C.2 is "NO," go to Question I.C.4.</i> | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| 3. All vents from nonagricultural process in the application area are subject to additional monitoring requirements.   | <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.: | TBA         |
| RN No.:     | RN111634507 |

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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.<br><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.<br><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.<br><i>If the response to Question I.E.1 is "NO," go to Section II.</i>  | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| ◆ 2. Fire training is conducted in the application area and subject to the exception provided in 30 TAC § 111.205.   | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| ◆ 3. Fires for recreation, ceremony, cooking, and warmth are used in the application area and subject to the exception provided in 30 TAC § 111.207.   | <input type="checkbox"/> YES <input 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 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.: | TBA         |
| RN No.:     | RN111634507 |

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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.  | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| ◆ 6. Hydrocarbon burning is used in the application area and subject to the exception provided in 30 TAC § 111.213.   | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| ◆ 7. The application area has received the TCEQ Executive Director approval of otherwise prohibited outdoor burning according to 30 TAC § 111.215.  | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| <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.  | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| <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.<br><i>See instructions for inclusive counties. If the response to Question III.A.1 is "NO," go to Section IV.</i> | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| <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.   | <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.: | TBA         |
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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.<br><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 type="checkbox"/> NO<br><input checked="" type="checkbox"/> N/A |
| 2. The application area is located at a petroleum refinery in the Beaumont/Port Arthur or Houston/Galveston/Brazoria area.<br><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).<br><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).<br><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 type="checkbox"/> YES <input checked="" type="checkbox"/> NO                                 |
| ◆ 2. The application area includes VOC transport vessel unloading operations.<br><i>For GOP applications, if the responses to Questions III.D.1 - D.2 are "NO," go to Section III.E.</i>  | <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.: | TBA         |
| RN No.:     | RN111634507 |

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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 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.<br><i>If the response to Question III.E.1 is "NO," go to Section III.F.</i>  | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| ◆ 2. Transfers to stationary storage containers used exclusively for the fueling of agricultural implements are the only transfer operations conducted at facilities in the application area.  | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| ◆ 3. All transfers at facilities in the application area are made into stationary storage containers with internal floating roofs, external floating roofs, or their equivalent.<br><i>If the response to Question III.E.2 and/or E.3 is "YES," go to Section III.F.</i>   | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| ◆ 4. The application area is located in a covered attainment county as defined in 30 TAC § 115.10.<br><i>If the response to Question III.E.4 is "NO," go to Question III.E.9.</i>  | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| ◆ 5. Stationary gasoline storage containers with a nominal capacity less than or equal to 1,000 gallons are located at the facility.   | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| ◆ 6. Stationary gasoline storage containers with a nominal capacity greater than 1,000 gallons are located at the facility.  | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| ◆ 7. At facilities located in covered attainment counties other than Bastrop, Bexar, Caldwell, Comal, Guadalupe, Hays, Travis, Williamson, or Wilson County, transfers are made to stationary storage tanks greater than 1000 gallons located at a facility which has dispensed less than 100,000 gallons of gasoline in a calendar month after October 31, 2014.<br><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.<br><i>If the response to Question III.E.8 is "YES," go to Section III.F.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO                                 |
| ◆  | 9. Transfers are made to stationary storage tanks located at a motor vehicle fuel dispensing facility which has dispensed no more than 10,000 gallons of gasoline in any calendar month after January 1, 1991 and for which construction began prior to November 15, 1992.   | <input type="checkbox"/> YES <input type="checkbox"/> NO                                 |
| ◆  | 10. Transfers are made to stationary storage tanks located at a motor vehicle fuel dispensing facility which has dispensed more than 10,000 gallons of gasoline in any calendar month after January 1, 1991 and for which construction began prior to November 15, 1992.   | <input type="checkbox"/> YES <input type="checkbox"/> NO                                 |
| ◆  | 11. Transfers are made to stationary storage tanks located at a motor vehicle fuel dispensing facility which commenced construction on or after November 15, 1992.   | <input type="checkbox"/> YES <input type="checkbox"/> NO                                 |
| ◆  | 12. At facilities located in Ellis, Johnson, Kaufman, Parker, or Rockwall County, transfers are made to stationary storage tanks located at a facility which has dispensed at least 10,000 gallons of gasoline but less than 125,000 gallons of gasoline in a calendar month after April 30, 2005.   | <input type="checkbox"/> YES <input type="checkbox"/> NO                                 |
| <b>F. Control of VOC Leaks from Transport Vessels (Complete this section for GOP applications for GOPs 511, 512, 513 and 514 only)</b> |  |  |
| ◆  | 1. Tank-truck tanks are filled with, or emptied of, gasoline at a facility that is subject to 30 TAC § 115.214(a)(1)(C) or 115.224(2) within the application area.   | <input type="checkbox"/> YES <input type="checkbox"/> NO<br><input type="checkbox"/> N/A |

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| <b>Form OP-REQ1: Page 8</b>   |   |
| <b>III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)</b>   |   |
| <b>F. Control of VOC Leaks from Transport Vessels (Complete this section for GOP applications for GOPs 511, 512, 513 and 514 only) (continued)</b>  |   |
| ◆ 2. Tank-truck tanks are filled with non-gasoline VOCs having a TVP greater than or equal to 0.5 psia under actual storage conditions at a facility subject to 30 TAC § 115.214(a)(1)(C) within the application area.  | <input type="checkbox"/> YES <input type="checkbox"/> NO<br><input type="checkbox"/> N/A            |
| ◆ 3. Tank-truck tanks are filled with, or emptied of, gasoline at a facility that is subject to 30 TAC § 115.214(b)(1)(C) or 115.224(2) within the application area.  | <input type="checkbox"/> YES <input type="checkbox"/> NO<br><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.<br><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<br><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.<br><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<br><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.<br><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<br><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<br><input type="checkbox"/> N/A            |

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

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| <b>Form OP-REQ1: Page 11</b>   |   |
| <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<br><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<br><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<br><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<br><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<br><input checked="" type="checkbox"/> N/A |

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| <b>Form OP-REQ1: Page 12</b>  |   |
| <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<br><input checked="" type="checkbox"/> N/A |
| 2. The application area includes one or more flares that emit or have the potential to emit HRVOC.<br><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<br><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.<br><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<br><input checked="" type="checkbox"/> N/A |

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| <b>Form OP-REQ1: Page 13</b>   |   |
| <b>IV. Title 30 TAC Chapter 117 - Control of Air Pollution from Nitrogen Compounds</b>   |   |
| <b>A. Applicability</b>  |   |
| ◆ 1. The application area is located in the Houston/Galveston/Brazoria, Beaumont/Port Arthur, or Dallas/Fort Worth Eight-Hour area.<br><i>For SOP applications, if the response to Question IV.A.1 is "YES," complete Sections IV.B - IV.F and IV.H.<br/>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.<br/>For GOP applications for GOP 517, if the response to Question IV.A.1 is "YES," complete Sections IV.C and IV.F.<br/>For GOP applications, if the response to Question IV.A.1 is "NO," go to Section VI.</i> | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| 2. The application area is located in Bexar, Comal, Ellis, Hays, or McLennan County and includes a cement kiln.<br><i>If the response to Question IV.A.2 is "YES," go to Question IV.H.1.</i>  | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| 3. The application area includes a utility electric generator in an east or central Texas county.<br><i>See instructions for a list of counties included.<br/>If the response to Question IV.A.3 is "YES," go to Question IV.G.1.<br/>If the responses to Questions IV.A.1 - 3 are all "NO," go to Question IV.H.1.</i>  | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| <b>B. Utility Electric Generation in Ozone Nonattainment Areas</b>   |   |
| 1. The application area includes units specified in 30 TAC §§ 117.1000, 117.1200, or 117.1300.<br><i>If the response to Question IV.B.1 is "NO," go to Question IV.C.1.</i>  | <input type="checkbox"/> YES <input 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>Form OP-REQ1: Page 14</b>  |  |
| <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>  |  |
| ◆ 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.<br><i>For SOP applications, if the response to Question IV.C.1 is "NO," go to Question IV.D.1. For GOP applications for GOP 517, if the response to Question IV.C.1 is "NO," go to Section IV.F.</i>           | <input type="checkbox"/> YES <input 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<br><input type="checkbox"/> N/A |
| ◆ 3. The application area includes an electric generating facility required to comply with the System Cap in 30 TAC § 117.320.  | <input type="checkbox"/> YES <input type="checkbox"/> NO                                 |
| <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<br><input 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<br><input type="checkbox"/> N/A |
| <b>F. Combustion Control at Minor Sources in Ozone Nonattainment Areas - Boilers, Process Heaters, Stationary Engines and Gas Turbines</b>  |  |
| ◆ 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).<br><i>For SOP applications, if the response to Question IV.F.1 is "NO," go to Question IV.G.1. For GOP applications, if the response to Question IV.F.1 is "NO," go to Section VI.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO                                 |
| ◆ 2. The application area is located in the Houston/Galveston/Brazoria area and has units that qualify for an exemption under 30 TAC § 117.2003(a).   | <input 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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| <b>Form OP-REQ1: Page 15</b>   |   |
| <b>IV. Title 30 TAC Chapter 117 - Control of Air Pollution from Nitrogen Compounds (continued)</b>   |   |
| <b>F. Combustion Control at Minor Sources in Ozone Nonattainment Areas - Boilers, Process Heaters, Stationary Engines and Gas Turbines (continued)</b>   |   |
| ◆ 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.<br><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.  |   |
| <b>G. Utility Electric Generation in East and Central Texas</b>  |   |
| 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.<br><i>If the response to Question IV.G.1 is "NO," go to Question IV.H.1.</i> | <input type="checkbox"/> YES <input 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            |
| <b>H. Multi-Region Combustion Control - Water Heaters, Small Boilers, and Process Heaters</b>  |   |
| 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.<br><i>If the response to question IV.H.1 is "NO," go to Section V.</i>           | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| 2. All water heaters, boilers or process heaters manufactured, distributed, retailed or installed qualify for an exemption under 30 TAC § 117.3203.  | <input type="checkbox"/> YES <input type="checkbox"/> NO            |

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| <b>Form OP-REQ1: Page 16</b>   |   |
| <b>V. Title 40 Code of Federal Regulations Part 59 (40 CFR Part 59) - National Volatile Organic Compound Emission Standards for Consumer and Commercial Products</b>   |   |
| <b>A. Subpart B - National Volatile Organic Compound Emission Standards for Automobile Refinish Coatings</b>   |   |
| 1. The application area manufactures automobile refinish 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 refinish 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 refinish coatings or coating components manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR § 59.100(c)(1) - (6).  | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| <b>B. Subpart C - National Volatile Organic Compound Emission Standards for Consumer Products</b>  |   |
| 1. The application area manufactures consumer products for sale or distribution in the United States.  | <input 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.<br><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.<br><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.<br><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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| <b>Form OP-REQ1: Page 18</b>  |  |
| <b>VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)</b>  |  |
| <b>B. Subpart Y - Standards of Performance for Coal Preparation and Processing Plants</b>   |  |
| 1. The application area is located at a coal preparation and processing Plant.<br><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).<br><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.<br><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.<br><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                                 |
| <b>C. Subpart GG - Standards of Performance for Stationary Gas Turbines (GOP applicants only)</b>   |  |
| ◆ 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.<br><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<br><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.<br><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.<br><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<br><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).<br><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.<br><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.<br><i>For SOP applications, if the response to Question VI.E.3 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.3 is "NO," go to Section VI.H.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO  |

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

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| <b>Form OP-REQ1: Page 21</b>  |   |
| <b>VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)</b>  |   |
| <b>G. Subpart QQQ - Standards of Performance for VOC Emissions from Petroleum Refinery Wastewater Systems (continued)</b>   |   |
| 3. The application area includes ancillary equipment which is physically separate from the wastewater system and does not come in contact with or store oily wastewater.  | <input type="checkbox"/> YES <input type="checkbox"/> NO  |
| 4. The application area includes non-contact cooling water systems.   | <input type="checkbox"/> YES <input type="checkbox"/> NO  |
| 5. The application area includes individual drain systems.<br><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.<br><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<br><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.<br><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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| <b>Form OP-REQ1: Page 22</b>   |   |
| <b>VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)</b>   |   |
| <b>H. Subpart AAAA - Standards of Performance for Small Municipal Waste Incineration Units for Which Construction Commenced After August 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 6, 2004 (continued)</b>   |   |
| ◆ 5. The application area includes at least one air curtain incinerator constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006.<br><i>If the response to Question VI.H.5 is "NO," go to Question VI.H.7.</i>  | <input type="checkbox"/> YES <input type="checkbox"/> NO  |
| ◆ 6. All air curtain incinerators constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006 combust only yard waste.   | <input type="checkbox"/> YES <input type="checkbox"/> NO  |
| ◆ 7. The application area includes at least one air curtain incinerator constructed before August 30, 1999 and not modified or reconstructed on or after June 6, 2006.   | <input type="checkbox"/> YES <input type="checkbox"/> NO  |
| ◆ 8. All air curtain incinerators constructed before August 30, 1999 and not modified or reconstructed on or after June 6, 2006 combust only yard waste.   | <input type="checkbox"/> YES <input type="checkbox"/> NO  |
| <b>I. Subpart CCCC - Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction Commenced After November 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 1, 2001</b>                                       |   |
| ◆ 1. The application area includes at least one commercial or industrial solid waste incineration unit, other than an air curtain incinerator.<br><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<br><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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| <b>Form OP-REQ1: Page 23</b>   |   |   |
| <b>VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)</b>   |   |   |
| <b>I. Subpart CCCC - Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction Commenced After November 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 1, 2001 (continued)</b> |   |   |
| ◆  | 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.<br><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.<br><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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| <b>Form OP-REQ1: Page 24</b>  |   |
| <b>VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (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</b>  |   |
| ◆ 1. The application area includes at least one very small municipal waste incineration unit or institutional incineration unit, other than an air curtain incinerator.<br><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<br><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.<br><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.<br><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.<br><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<br><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<br><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).<br><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>   |  |
| <i>Applicability</i>  |  |
| 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.<br><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 |
| <i>Roadway Construction</i>   |  |
| 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 |
| <i>Manufacturing Commercial Asbestos</i>  |  |
| 3. The application area includes a manufacturing operation using commercial asbestos.<br><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>  |  |
| <i>Manufacturing Commercial Asbestos (continued)</i>   |  |
| 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 |
| <i>Asbestos Spray Application</i>  |  |
| 4. The application area includes operations in which asbestos-containing materials are spray applied.<br><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.<br><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.<br><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>Form OP-REQ1: Page 29</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>  |  |
| <i>Fabricating Commercial Asbestos (continued)</i>   |  |
| 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 |
| <i>Non-sprayed Asbestos Insulation</i>   |  |
| 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 |
| <i>Asbestos Conversion</i>   |  |
| 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.<br><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>  |  |
| <i>Applicability</i>  |  |
| 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).<br><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.<br><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).<br><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.<br><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).<br><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>  |  |
| <i>Container Requirements</i>   |  |
| 15. The application area has containers, as defined in 40 CFR § 61.341, that receive non-exempt benzene waste.<br><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.<br><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 |
| <i>Individual Drain Systems</i>   |  |
| 18. The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage non-exempt benzene waste.<br><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.<br><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).<br><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>Form OP-REQ1: Page 33</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>   |   |
| <i>Individual Drain Systems (continued)</i>  |   |
| 22. The application area has individual drain systems complying with 40 CFR § 61.346(b).<br><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.<br><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).<br><i>If the response to Question VIII.B.1 is "NO," go to Section VIII.D.</i>  | <input checked="" 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>B. Subpart F - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry (continued)</b>  |   |
| 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).<br><i>If the response to Question VIII.B.2 is "NO," go to Section VIII.D.</i>  | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| 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.   | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| 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.  | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| 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.<br><i>If the response to Questions VIII.B.3, B.4 and B.5 are all "NO," go to Section VIII.D.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO            |

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| <b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>  |  |
| <b>C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater</b>   |  |
| <b><i>Applicability</i></b>   |  |
| 1. The application area is located at a site that is subject to 40 CFR 63, Subpart F and the application area includes process vents, storage vessels, transfer racks, or waste streams associated with a chemical manufacturing process subject to 40 CFR 63, Subpart F.<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 |
| <b><i>Vapor Collection and Closed Vent Systems</i></b>  |  |
| 6. Flow indicators are installed, calibrated, maintained, and operated at the entrances to bypass lines in the application area.  | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 7. Bypass lines in the application area are secured in the closed position with a car-seal or a lock-and-key type configuration.  | <input type="checkbox"/> YES <input type="checkbox"/> NO |

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| <b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>  |  |
| <b>C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)</b> |  |
| <b><i>Reloading or Cleaning of Railcars, Tank Trucks, or Barges</i></b>   |  |
| 8. The application area includes reloading and/or cleaning of railcars, tank trucks, or barges that deliver HAPs to a storage tank.<br><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.<br><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.<br><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.<br><i>If the response to Question VIII.C.15 is "NO," go to Question VIII.C.17.</i>                 | <input type="checkbox"/> YES <input type="checkbox"/> NO |

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| <b>Form OP-REQ1: Page 37</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>  |  |
| 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.<br><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.<br><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.<br><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.<br><i>If the responses to Questions VIII.C.27 - VIII.C.28 are both "NO," go to Question VIII.C.30.</i>      | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 29. The application area includes waste management units that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream prior to shipment or transport.   | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 30. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.  | <input type="checkbox"/> YES <input type="checkbox"/> NO |

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| <b>Form OP-REQ1: Page 39</b>  |  |
| <b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>  |  |
| <b>C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)</b>   |  |
| <b><i>Drains</i></b>  |  |
| 31. The application area includes individual drain systems that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream.<br><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).<br><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).<br><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.<br><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.<br><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.<br><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.<br><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.<br><i>If the response to Question VIII.G.3 is "YES," go to Question VIII.G.10.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO            |

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| <b>Form OP-REQ1: Page 42</b>  |  |
| <b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>  |  |
| <b>G. Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) (continued)</b>   |  |
| 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.<br><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.<br><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).<br><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).<br><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).<br><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).<br><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.<br><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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| <b>Form OP-REQ1: Page 43</b>  |   |
| <b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>  |   |
| <b>H. Subpart S - National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry</b>   |   |
| 1. The application area includes processes that produce pulp, paper, or paperboard and are located at a Plant site that is a major source of HAPs as defined in 40 CFR § 63.2.<br><i>If the response to Question VIII.H.1 is "NO," go to Section VIII.I.</i>                                  | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| 2. The application area uses processes and materials specified in 40 CFR § 63.440(a)(1) - (3).<br><i>If the response to Question VIII.H.2 is "NO," go to Section VIII.I.</i>  | <input checked="" 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.<br><i>If the response to Question VIII.H.3 is "NO," go to Section VIII.I.</i>  | <input type="checkbox"/> YES <input checked="" 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.<br><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>Form OP-REQ1: Page 44</b>  |   |
| <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.<br><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.<br><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>Form OP-REQ1: Page 45</b>  |  |
| <b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>  |  |
| <b>J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins (continued)</b>  |  |
| 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.<br><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.<br><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.<br><i>If the responses to Questions VIII.J.8 - VIII.J.9 are both "NO," go to Question VIII.J.11.</i>        | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 10. The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.   | <input type="checkbox"/> YES <input type="checkbox"/> NO |

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| <b>Form OP-REQ1: Page 46</b>   |  |
| <b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>   |  |
| <b>J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins (continued)</b>   |  |
| <b>Containers</b>  |  |
| 11. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.  | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| <b>Drains</b>  |  |
| 12. The application area includes individual drain systems that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.<br><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.<br><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).<br><i>If the response to Question VIII.J.16 is "NO," go to Section VIII.K.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |

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

**L. Subpart X - National Emission Standards for Hazardous Air Pollutants from Secondary Lead Smelting**

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.  YES  NO  
 N/A  
*If the response to Question VIII.L.1 is "NO" or "N/A," go to Section VIII.M.*

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.  YES  NO

**M. Subpart Y - National Emission Standards for Marine Tank Vessel Loading Operations**

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.  YES  NO

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

***Applicability***

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).  YES  NO  
*If the response to Question VIII.N.1 is "NO," go to Section VIII.O.*

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).  YES  NO  
*If the response to Question VIII.N.2 is "YES," go to Section VIII.O.*

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| <b>Form OP-REQ1: Page 49</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>  |  |
| 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).<br><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.<br><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.<br><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>   |   |
| <i>Applicability (continued)</i>  |   |
| 9. The application area includes Group 1 or Group 2 wastewater streams that are complying with 40 CFR § 63.640(o)(2)(ii).<br><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).<br><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<br><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.<br><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.<br><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.<br><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.<br><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<br><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.<br><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><br><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.<br><i>For SOP applications, if the response to Question VIII.Q.3 is "YES," go to Section VIII.R.</i><br><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.<br><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>  |  |
| ◆ 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.<br><i>For SOP applications, if the response to Question VIII.Q.5 is "YES," go to Section VIII.R.<br/>For GOP applications, if the response to Question VIII.Q.5 is "YES," go to Section VIII.Z.<br/>For all applications, if the response to Question VIII.Q.5 is "NO," go to Question VIII.Q.9.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| ◆ 6. The application area includes a triethylene glycol (TEG) dehydration unit.<br><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>   | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| ◆ 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.  | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| ◆ 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.   | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| ◆ 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).   | <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.<br><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.<br><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<br><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<br><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.<br><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>Form OP-REQ1: Page 56</b>   |   |
| <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.<br><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.<br><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.<br><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.<br><i>If the response to Question VIII.W.12 is "NO," go to Question VIII.W.15.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 13. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of covers and, if vented, closed vent systems and control devices.  | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 14. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.  | <input type="checkbox"/> YES <input type="checkbox"/> NO |

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| <b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>  |  |
| <b>W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)</b>   |  |
| 15. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of an acetal resins production process unit; an acrylic and modacrylic fiber production process unit complying with 40 CFR § 63.1103(b)(3)(i); or an existing polycarbonate production process unit.<br><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).<br><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>Form OP-REQ1: Page 59</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>   |   |
| 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<br><input type="checkbox"/> N/A |
| 21. The application area includes waste streams generated from an ethylene production process unit.<br><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<br><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).<br><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.<br><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.<br><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>Form OP-REQ1: Page 60</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>   |  |
| 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).<br><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.<br><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).<br><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.<br><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.<br><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.<br><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.<br><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.<br><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.<br><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).<br><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).<br><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.<br><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.<br><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.<br><i>If the response to Question VIII.W.45 is "YES," go to Question VIII.W.47.</i>  | <input type="checkbox"/> YES <input type="checkbox"/> NO |

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| <b>Form OP-REQ1: Page 63</b>   |  |
| <b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>   |  |
| <b>W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)</b>  |  |
| 46. Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.   | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 47. The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage a waste stream containing benzene.<br><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.<br><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).<br><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).<br><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.<br><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.<br><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.<br><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.<br><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.<br><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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| <b>Form OP-REQ1: Page 65</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>  |  |
| 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.<br><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.<br><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.<br><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.<br><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.<br><i>If the response to Question VIII.X.18 is "NO," go to Section VIII.Y.</i>                 | <input type="checkbox"/> YES <input type="checkbox"/> NO |

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| <b>Form OP-REQ1: Page 67</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>   |  |
| <b>Drains (continued)</b>   |  |
| 19. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that meet the criteria listed in 40 CFR § 63.149(d) and § 63.1330(b)(12).<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 a 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 checked="" type="checkbox"/> YES <input 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.<br><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.<br><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>Form OP-REQ1: Page 69</b>   |  |
| <b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>   |  |
| <b>AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)</b>   |  |
| 5. The application area includes process wastewater streams.<br><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.<br><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.<br><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.<br><i>If the responses to Questions VIII.AA.11 and VIII.AA.12 are both "NO," go to Question VIII.AA.18.</i>               | <input type="checkbox"/> YES <input type="checkbox"/> NO |

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| <b>Form OP-REQ1: Page 70</b>  |  |
| <b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>  |  |
| <b>AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)</b>  |  |
| 13. Group 1 wastewater streams are transferred to an offsite treatment facility meeting the requirements of 40 CFR § 63.138(h).<br><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.<br><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.<br><i>If the response to Question VIII.AA.19 is "NO," go to Question VIII.AA.22.</i>                   | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 20. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.  | <input type="checkbox"/> YES <input type="checkbox"/> NO |

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| <b>Form OP-REQ1: Page 71</b>   |  |
| <b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>   |  |
| <b>AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)</b>   |  |
| 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).<br><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).<br><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>Form OP-REQ1: Page 72</b>  |   |
| <b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>  |   |
| <b>AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)</b>  |   |
| <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.<br><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.<br><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).<br><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.<br><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.<br><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.<br><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.<br><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.<br><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.<br><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 BBBB - 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.<br><i>If the answer to Question EE.1 is "NO," go to Section VIII.FF.</i>  | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| 2. The application area includes a pipeline breakout station, as defined in 40 CFR Part 63, Subpart BBBB, not subject to the control requirements of 40 CFR Part 63, Subpart R.  | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| 3. The application area includes a pipeline pumping station as defined in 40 CFR Part 63, Subpart BBBB.  | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| 4. The application area includes a bulk gasoline Plant as defined in 40 CFR Part 63, Subpart BBBB.<br><i>If the answer to Question VIII.EE.4 is "NO," go to Question VIII.EE.6.</i>  | <input type="checkbox"/> YES <input 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 BBBB, not subject to the control requirements of 40 CFR Part 63, Subpart R or Subpart CC.<br><i>If the answer to Question VIII.EE.6 is "NO," go to Section VIII.FF.</i> | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| 7. The bulk gasoline terminal has throughput of less than 250,000 gallons per day.<br><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.<br><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.<br><i>If the answer to Question VIII.FF.1 is "NO," go to Section VIII.GG.</i>   | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| ◆ 2. The application area includes at least one gasoline dispensing facility as defined in 40 CFR § 63.11132.<br><i>If the answer to Question VIII.FF.2 is "NO," go to Section VIII.GG.</i>  | <input 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 type="checkbox"/> YES <input type="checkbox"/> NO            |
| ◆ 4. The application area includes at least one gasoline dispensing facility where gasoline is dispensed from a fixed gasoline storage tank into a portable gasoline tank for the on-site delivery and subsequent dispensing into other gasoline-fueled equipment.   | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| <b>GG. Recently Promulgated 40 CFR Part 63 Subparts</b>  |   |
| ◆ 1. The application area is subject to one or more promulgated 40 CFR Part 63 subparts not addressed on this form.<br><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.<br><b>Subpart YYYY, Subpart ZZZZ, Subpart DDDDD</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<br><input type="checkbox"/> N/A |
| <b>B. Subpart B - Servicing of Motor Vehicle Air Conditioners</b>  |   |
| ◆ 1. Servicing, maintenance, and/or repair of fleet vehicle air conditioning systems using ozone-depleting refrigerants is conducted in the application area.                                    | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO                                 |
| <b>C. Subpart C - Ban on Nonessential Products Containing Class I Substances and Ban on Nonessential Products Containing or Manufactured with Class II Substances</b>                            |   |
| ◆ 1. The application area sells or distributes one or more nonessential products (which release a Class I or Class II substance) that are subject to 40 CFR Part 82, Subpart C.                  | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO<br><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<br><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<br><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<br><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<br><input type="checkbox"/> N/A |

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| <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 type="checkbox"/> YES <input checked="" 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<br><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<br><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.<br><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<br><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<br><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<br><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<br><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.<br><i>If the response to Question XI.B.1 is "NO" or "N/A," go to Section XI.C.</i>  | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO<br><input type="checkbox"/> N/A |
| ◆ 2. Provide the Part and Subpart designation for the federal rule(s) or the Chapter, Subchapter, and Division designation for the State regulation(s) in the space provided below.   |   |
| <b>C. Emission Limitation Certifications</b>  |   |
| ◆ 1. The application area includes units for which federally enforceable emission limitations have been established by certification.   | <input 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.<br><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.<br><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.<br><i>If the response to Question XI.F.1 is "NO," go to Question XI.F.7.</i>                           | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| 2. The application area includes units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart H for NO <sub>x</sub> and heat input.   | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| 3. The application area includes gas or oil-fired units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart H for NO <sub>x</sub> , and the monitoring requirements of 40 CFR Part 75, Appendix D for heat input.                | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| 4. The application area includes gas or oil-fired peaking units that are complying with the monitoring requirements of 40 CFR Part 75, Appendix E for NO <sub>x</sub> , and the monitoring requirements of 40 CFR Part 75, Appendix D for heat input. | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| 5. The application area includes gas or oil-fired units that are complying with the Low Mass Emissions monitoring requirements of 40 CFR § 75.19 for NO <sub>x</sub> and heat input.  | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| 6. The application area includes units that are complying with EPA-approved alternative monitoring system requirements of 40 CFR Part 75, Subpart E for NO <sub>x</sub> and heat input.   | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| 7. The application area includes emission units that qualify for the CSAPR NO <sub>x</sub> Ozone Season Group 2 retired unit exemption.   | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |

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| <b>Form OP-REQ1: Page 80</b>   |   |
| <b>XI. Miscellaneous (continued)</b>   |   |
| <b>G. 40 CFR Part 97, Subpart FFFFF - Texas SO<sub>2</sub> Trading Program</b>   |   |
| 1. The application area includes emission units complying with the requirements of the Texas SO <sub>2</sub> Trading Program.<br><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.<br><i>If the response to Question XI.J.1 is "NO," go to question XI.J.3.</i>  | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO                                 |
| ◆  | 2. The applicant has or will generate emission reductions to be credited in the TCEQ Emissions Banking and Trading Program.   | <input type="checkbox"/> YES <input type="checkbox"/> NO<br><input type="checkbox"/> N/A            |
| ◆  | 3. The applicant has or will generate discrete emission reductions to be credited in the TCEQ Emissions Banking and Trading Program.  | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO<br><input type="checkbox"/> N/A |

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| <b>Form OP-REQ1: Page 82</b>                                 |   |   |
| <b>XI. Miscellaneous (continued)</b>                         |   |   |
| <b>J. Title 30 TAC Chapter 101, Subchapter H (continued)</b> |   |   |
| ◆  | 4. The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area where the facilities have a collective uncontrolled design capacity to emit 10 tpy or more of NO <sub>x</sub> .   | <input 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 checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| ◆  | 2. The permit currently contains at least one periodic monitoring requirement.<br><i>If the responses to Questions XI.K.1 and XI.K.2 are both "NO," go to Section XI.L.</i>   | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| ◆  | 3. All periodic monitoring requirements are being removed from the permit with this application.  | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |

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| <b>Form OP-REQ1: Page 83</b>              |   |   |
| <b>XI. Miscellaneous (continued)</b>      |   |   |
| <b>L. Compliance Assurance Monitoring</b> |   |   |
| ◆   | 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.<br><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.<br><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 type="checkbox"/> YES <input checked="" 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.<br><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 type="checkbox"/> YES <input checked="" 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).<br><i>If the response to Question XI.L.8 is "YES," go to Section XI.M.</i>  | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |

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| <b>Form OP-REQ1: Page 84</b>  |  |   |
| <b>XI. Miscellaneous (continued)</b>  |  |   |
| <b>L. Compliance Assurance Monitoring (continued)</b>   |  |   |
| ◆   | 9. At least one of the CAM proposals as described by question XI.L.3 or XI.L.4 addresses particulate matter, and the emission unit has a capture system as defined in 40 CFR §64.1.  | <input checked="" 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 checked="" type="checkbox"/> NO                                 |
| ◆   | 11. At least one of the CAM proposals as described by question XI.L.3 or XI.L.4 addresses a regulated pollutant other than particulate matter or VOC, and the emission unit has a capture system as defined in 40 CFR §64.1.               | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO                                 |
| ◆   | 12. The control device in the CAM proposal as described by question XI.L.3 or XI.L.4 has a bypass.   | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO                                 |
| <b>M. Title 30 TAC Chapter 113, Subchapter D, Division 5 - Emission Guidelines and Compliance Times</b> |  |   |
| ◆   | 1. The application area includes at least one air curtain incinerator that commenced construction on or before December 9, 2004.<br><i>If the response to Question XI.M.1 is "NO," or "N/A," go to Section XII.</i>                        | <input type="checkbox"/> YES <input type="checkbox"/> NO<br><input checked="" type="checkbox"/> N/A |
| ◆   | 2. All air curtain incinerators constructed on or before December 9, 2004 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.  | <input type="checkbox"/> YES <input type="checkbox"/> NO  |
| <b>XII. New Source Review (NSR) Authorizations</b>  |  |   |
| <b>A. Waste Permits with Air Addendum</b>   |  |   |
| ◆   | 1. The application area includes a Municipal Solid Waste Permit or an Industrial Hazardous Waste with an Air Addendum.<br><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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| <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.<br><i>If the response to XII.B.1 is "NO," go to Section XII.C. If the response to XII.B.1 is "YES," be sure to include the standard permit's registration numbers in Section XII.H and answer XII.B.2 - B.16 as appropriate.</i> | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| ◆  | 2. The application area includes at least one "State Pollution Control Project" Air Quality Standard Permit NSR authorization under 30 TAC § 116.617.   | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| ◆  | 3. The application area includes at least one non-rule Air Quality Standard Permit for Pollution Control Projects NSR authorization.  | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| ◆  | 4. The application area includes at least one "Installation and/or Modification of Oil and Gas Facilities" Air Quality Standard Permit NSR authorization under 30 TAC § 116.620.  | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| ◆  | 5. The application area includes at least one non-rule Air Quality Standard Permit for Oil and Gas Handling and Production Facilities NSR authorization.  | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| ◆  | 6. The application area includes at least one "Municipal Solid Waste Landfill" Air Quality Standard Permit NSR authorization under 30 TAC § 116.621.  | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| ◆  | 7. The application area includes at least one "Municipal Solid Waste Landfill Facilities and Transfer Stations" Standard Permit authorization under 30 TAC Chapter 330, Subchapter U.   | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
|  | 8. The application area includes at least one "Concrete Batch Plant" Air Quality Standard Permit NSR authorization.   | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| ◆  | 9. The application area includes at least one "Concrete Batch Plant with Enhanced Controls" Air Quality Standard Permit NSR authorization.  | <input type="checkbox"/> YES <input type="checkbox"/> NO            |
| ◆  | 10. The application area includes at least one "Hot Mix Asphalt Plant" Air Quality Standard Permit NSR authorization.   | <input type="checkbox"/> YES <input type="checkbox"/> NO            |

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

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| <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.: 171518  | Issuance Date: 06/04/2024 | Authorization No.: | Issuance Date: |
| Authorization No.:   | Issuance Date:            | Authorization No.: | Issuance Date: |
| Authorization No.:   | Issuance Date:            | Authorization No.: | Issuance Date: |
| Authorization No.:   | Issuance Date:            | Authorization No.: | Issuance Date: |

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| <b>Form OP-REQ1: Page 88</b>  |                              |
| <b>XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)</b>   |                              |
| <b>◆ I. Permits by Rule (30 TAC Chapter 106) for the Application Area</b>   |                              |
| <i>A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.</i> |                              |
| PBR No.: 106.454  | Version No./Date: 11/01/2001 |
| PBR No.: 106.472  | Version No./Date: 09/04/2000 |
| PBR No.: 106.511  | Version No./Date: 09/04/2000 |
| PBR No.:  | Version No./Date:            |
| PBR No.:  | Version No./Date:            |
| PBR No.:  | Version No./Date:            |
| PBR No.:  | Version No./Date:            |
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| PBR No.:  | Version No./Date:            |
| PBR No.:  | Version No./Date:            |
| PBR No.:  | Version No./Date:            |
| <b>◆ J. Municipal Solid Waste and Industrial Hazardous Waste Permits With an Air Addendum</b>   |                              |
| Permit No.:   | Issuance Date:               |
| Permit No.:   | Issuance Date:               |
| Permit No.:   | Issuance Date:               |
| Permit No.:   | Issuance Date:               |

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

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 08/09/2024 | TBA        | RN111634507          |

| Unit AI | Revision No. | Unit/Group/Process ID No. | Unit/Group/Process Applicable Form | Potentially Applicable Regulatory Name | Negative Applicability/Superseded Requirement Citation | Negative Applicability/Superseded Requirement Reason   |
|---------|--------------|---------------------------|------------------------------------|--|--|--|
|         |              | BOILER1                   | OP-UA6                             | Chapter 112                            | §112.8(a), §112.9(a)                                   | Steam generating unit does not combust solid or liquid fossil fuel.  |
|         |              | BOILER1                   | OP-UA6                             | NSPS Dc                                | §60.40c(a)   | Steam generating unit has a maximum design heat input capacity greater than 29 MW (100 MMBtu/hr).  |
|         |              | HRSB                      | OP-UA6                             | NSPS Dc                                | §60.40c(e)   | Source is a heat recovery steam generator associated with a stationary combustion turbine that is subject to 40 CFR Part 60, Subpart KKKK  |
|         |              | HRSB                      | OP-UA6                             | NSPS Db                                | §60.40b(i)   | Source is a heat recovery steam generator associated with a stationary combustion turbine that is subject to 40 CFR Part 60, Subpart KKKK. |
|         |              | PM                        | OP-REQ2                            | MACT JJJJ                              | §63.3290   | U.S. EPA indicated that paper machines with on-machine coaters are not subject to 40 CFR Part 63, Subpart JJJJ. <sup>3</sup>               |
|         |              | PM                        | OP-REQ2                            | MACT S                                 | §63.440(c)   | The Mill will produce pulp and paper secondary fibers but will not contain a bleaching system.   |
|         |              | TURBINE                   | OP-UA11                            | NSPS TTTT                              | §60.5509(a)(2)   | Turbine does not serve a generator or generators capable of selling electricity to a utility power distribution system.                    |

<sup>3</sup> U.S. EPA indicated on-machine coaters are not subject to 40 CFR Part 63, Subpart JJJJ in a 2003 memorandum to the Forest and Paper Association.

**Applicable Requirements Summary**  
**Form OP-REQ3**  
**(Page 2)**  
**Federal Operating Permit Program**  
**Table 1a: Additions**

|   |  |   |
|---|--|---|
| <b>Date:</b> 08/09/2024                                   | <b>Regulated Entity No.:</b> RN111634507 | <b>Permit No.:</b> TBA                                      |
| <b>Company Name:</b> Graphic Packaging International, LLC |  | <b>Area Name:</b> Graphic Packaging International Waco 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)  |
|--------------|---------------------------|------------------------------------|------------------|-----------------|--|--|
|              | BOILER1                   | OP-UA6                             | 63DDDD<br>D-1    | HAPS            | MACT DDDDD                             | §63.7500(a)(1)-Table 3.1<br>§63.7500(a)(1)<br>§63.7500(a)(3)<br>§63.7505(a)<br>§63.7540(a)<br>[G]§63.7540(a)(10)<br>§63.7540(a)(12)<br>§63.7540(a)(13) |
|              | BOILER1                   | OP-UA6                             | 60Db-1           | SO <sub>2</sub> | NSPS Db                                | 60.42b(k)(2)   |
|              | BOILER1                   | OP-UA6                             | 60Db-1           | PM              | NSPS Db                                | §60.40b(a)   |
|              | BOILER1                   | OP-UA6                             | 60Db-1           | PM(OPACITY)     | NSPS Db                                | §60.40b(a)   |
|              | BOILER1                   | OP-UA6                             | 60Db-1           | NO <sub>x</sub> | NSPS Db                                | §60.44b(l)(1)<br>§60.44b(h)<br>§60.44b(i)<br>§60.46b(a)  |

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program  
Table 1a: Additions**

|  |   |                        |
|--|---|------------------------|
| <b>Date:</b> 08/09/202408/09/2024                        | <b>Regulated Entity No.:</b> RN111634507                    | <b>Permit No.:</b> TBA |
| <b>Company Name:</b> Graphic Packaging International LLC | <b>Area Name:</b> Graphic Packaging International Waco 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)   |
|--------------|---------------------------|------------------------------------|------------------|--------------------------|--|---|
|              | BYPASS                    | OP-UA15                            | R1111-1          | PM(OPACITY)              | Chapter 111                            | §111.111(a)(1)(C)<br>§111.111(a)(1)(E)  |
|              | COOLINGTWR                | OP-UA15                            | R1111-1          | PM(OPACITY)              | Chapter 111                            | §111.111(a)(1)(C)<br>§111.111(a)(1)(E)  |
|              | FIREPUMP1                 | OP-UA2                             | 60III-1          | NMHC and NO <sub>x</sub> | NSPS III                               | §60.4205(c)-Table 4<br>§60.4206<br>§60.4207(b)<br>[G]§60.4211(a)<br>§60.4211(c)<br>[G]§60.4211(f)<br>§60.4218 |
|              | FIREPUMP1                 | OP-UA2                             | 60III-1          | PM                       | NSPS III                               | §60.4205(c)-Table 4<br>§60.4206<br>§60.4207(b)<br>[G]§60.4211(a)<br>§60.4211(c)<br>[G]§60.4211(f)<br>§60.4218 |
|              | FIREPUMP1                 | OP-UA2                             | 63ZZZZ-1         | HAPS                     | MACT ZZZZ                              | §63.6590(c)   |

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program  
Table 1a: Additions**

|  |   |                        |
|--|---|------------------------|
| <b>Date:</b> 08/09/202408/09/2024                        | <b>Regulated Entity No.:</b> RN111634507                    | <b>Permit No.:</b> TBA |
| <b>Company Name:</b> Graphic Packaging International LLC | <b>Area Name:</b> Graphic Packaging International Waco 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)   |
|--------------|---------------------------|------------------------------------|------------------|--------------------------|--|---|
|              | FIREPUMP2                 | OP-UA2                             | 60III-1          | NMHC and NO <sub>x</sub> | NSPS IIII                              | §60.4205(c)-Table 4<br>§60.4206<br>§60.4207(b)<br>[G]§60.4211(a)<br>§60.4211(c)<br>[G]§60.4211(f)<br>§60.4218 |
|              | FIREPUMP2                 | OP-UA2                             | 60III-1          | PM                       | NSPS IIII                              | §60.4205(c)-Table 4<br>§60.4206<br>§60.4207(b)<br>[G]§60.4211(a)<br>§60.4211(c)<br>[G]§60.4211(f)<br>§60.4218 |
|              | FIREPUMP2                 | OP-UA2                             | 63ZZZZ-1         | HAPS                     | MACT ZZZZ                              | §63.6590(c)   |

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program  
Table 1a: Additions**

|  |   |                        |
|--|---|------------------------|
| <b>Date:</b> 08/09/202408/09/2024                        | <b>Regulated Entity No.:</b> RN111634507                    | <b>Permit No.:</b> TBA |
| <b>Company Name:</b> Graphic Packaging International LLC | <b>Area Name:</b> Graphic Packaging International Waco 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)  |
|--------------|---------------------------|------------------------------------|------------------|-----------------|--|--|
|              | HRSG                      | OP-UA6                             | 63DDDD<br>D-1    | HAPS            | MACT DDDDD                             | §63.7500(a)(1)-Table 3.1<br>§63.7500(a)(1)<br>§63.7500(a)(3)<br>§63.7505(a)<br>§63.7540(a)<br>[G]§63.7540(a)(10)<br>§63.7540(a)(12)<br>§63.7540(a)(13) |
|              | PMFEASV                   | OP-UA15                            | R1111-1          | PM(OPACITY)     | Chapter 111                            | §111.111(a)(1)(C)<br>§111.111(a)(1)(E)   |
|              | STARCH                    | OP-UA15                            | R1151-1          | PM              | Chapter 111                            | § 111.151(a)<br>§ 111.151(c)   |
|              | TURBINEV                  | OP-UA15                            | R1111-1          | PM(OPACITY)     | Chapter 111                            | §111.111(a)(1)(C)<br>§111.111(a)(1)(E)   |
|              | TURBINE                   | OP-UA11                            | 60KKKK-<br>1     | NO <sub>x</sub> | NSPS KKKK                              | §60.4320(a)-Table 1<br>§60.4320(a)<br>§60.4320(b)<br>§60.4325<br>§60.4333(a)<br>§60.4335(b)(1)<br>[G]§60.4345  |

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program  
Table 1a: Additions**

|  |   |                        |
|--|---|------------------------|
| <b>Date:</b> 08/09/202408/09/2024                        | <b>Regulated Entity No.:</b> RN111634507                    | <b>Permit No.:</b> TBA |
| <b>Company Name:</b> Graphic Packaging International LLC | <b>Area Name:</b> Graphic Packaging International Waco 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)  |
|--------------|---------------------------|------------------------------------|------------------|-----------------|--|--|
|              | TURBINE                   | OP-UA11                            | 60KKKK-1         | SO <sub>2</sub> | NSPS KKKK                              | §60.4330(a)(1)<br>§60.4333(a)<br>[G]§60.4385   |
|              | TURBINE                   | OP-UA11                            | 63YYYY-1         | HAPS            | MACT YYYY                              | §63.6100<br>§63.6100-Table 1.3<br>§63.6105(a)<br>§63.6105 (c)<br>§63.6130(a)<br>§63.6130(a)-Table 4<br>§63.6140(a)<br>§63.6165 |

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program  
Table 1b: Additions**

|  |   |                        |
|--|---|------------------------|
| <b>Date:</b> 04/25/2024                                  | <b>Regulated Entity No.:</b> RN111634507                    | <b>Permit No.:</b> TBA |
| <b>Company Name:</b> Graphic Packaging International LLC | <b>Area Name:</b> Graphic Packaging International Waco Mill |                        |

| Revision No. | Unit/Group/Process ID No. | SOP/GOP Index No. | Pollutant       | Monitoring and Testing Requirements   | Recordkeeping Requirements   | Reporting Requirements   |
|--------------|---------------------------|-------------------|-----------------|---|--|--|
|              | BOILER1                   | 63DDDDD-1         | HAPS            | §63.7510(g)<br>§63.7515(d)<br>§63.7525(a)(7)<br>§63.7540(a)<br>[G]§63.7540(a)(10) | §63.7555(a)<br>§63.7555(a)(1)<br>§63.7560(a)<br>§63.7560(b)<br>§63.7560(c) | §63.7530(e)<br>§63.7530(f)<br>§63.7545(a)<br>§63.7545(b)<br>§63.7545(c)<br>[G]§63.7545(e)<br>§63.7550(a)<br>[G]§63.7550(b)<br>[G]§63.7550(c)<br>[G]§63.7550(h) |
|              | BOILER1                   | 60Db-1            | SO <sub>2</sub> | §60.47b(f)  | §60.45b(k)<br>§60.49b(o)<br>§60.49b(r)<br>§60.49b(r)(1)                    | §60.49b(a)<br>§60.49b(a)(1)<br>§60.49b(r)<br>§60.49b(r)(1)   |
|              | BOILER1                   | 60Db-1            | PM              |   | [G]§60.49b(d)<br>§60.49b(o)  | §60.49b(a)<br>§60.49b(a)(1)<br>§60.49b(a)(3)   |
|              | BOILER1                   | 60Db-1            | PM(OPACITY)     |   | [G]§60.49b(d)<br>§60.49b(o)  | §60.49b(a)<br>§60.49b(a)(1)<br>§60.49b(a)(3)   |

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program  
Table 1b: Additions**

|  |   |                        |
|--|---|------------------------|
| <b>Date:</b> 04/25/2024                                  | <b>Regulated Entity No.:</b> RN111634507                    | <b>Permit No.:</b> TBA |
| <b>Company Name:</b> Graphic Packaging International LLC | <b>Area Name:</b> Graphic Packaging International Waco Mill |                        |

| Revision No. | Unit/Group/Process ID No. | SOP/GOP Index No. | Pollutant                | Monitoring and Testing Requirements  | Recordkeeping Requirements  | Reporting Requirements   |
|--------------|---------------------------|-------------------|--------------------------|--|---|--|
|              | BOILER1                   | 60Db-1            | NO <sub>x</sub>          | §60.46b(c)<br>§60.46b(e)<br>§60.46b(e)(1)<br>§60.46b(e)(3)<br>[G]§60.48b(b)<br>§60.48b(c)<br>§60.48b(d)<br>§60.48b(e)<br>[G]§60.48b(e)(2)<br>§60.48b(e)(3)<br>§60.48b(f) | [G]§60.48b(b)<br>§60.48b(c)<br>[G]§60.49b(d)<br>[G]§60.49b(g)<br>§60.49b(o) | §60.49b(a)<br>§60.49b(a)(1)<br>§60.49b(a)(3)<br>§60.49b(b)<br>§60.49b(h)<br>§60.49b(i)<br>§60.49b(v)<br>§60.49b(w) |
|              | BYPASS                    | R1111-1           | PM(OPACITY)              | [G]§111.111 (a)(1)(F)  |   |  |
|              | COOLINGTWR                | R1111-1           | PM(OPACITY)              | [G]§111.111 (a)(1)(F)  |   |  |
|              | FIREPUMP                  | 60III-1           | NMHC and NO <sub>x</sub> |  |   | [G] §60.4214(d)  |
|              | FIREPUMP                  | 60III-1           | PM                       |  |   | [G] §60.4214(d)  |
|              | FIREPUMP                  | 63ZZZZ-1          | HAPS                     |  |   |  |

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program  
Table 1b: Additions**

|  |   |                        |
|--|---|------------------------|
| <b>Date:</b> 04/25/2024                                  | <b>Regulated Entity No.:</b> RN111634507                    | <b>Permit No.:</b> TBA |
| <b>Company Name:</b> Graphic Packaging International LLC | <b>Area Name:</b> Graphic Packaging International Waco Mill |                        |

| Revision No. | Unit/Group/Process ID No. | SOP/GOP Index No. | Pollutant   | Monitoring and Testing Requirements   | Recordkeeping Requirements   | Reporting Requirements   |
|--------------|---------------------------|-------------------|-------------|---|--|--|
|              | HRSG                      | 63DDDDD-1         | HAPS        | §63.7510(g)<br>§63.7515(d)<br>§63.7525(a)(7)<br>§63.7540(a)<br>[G]§63.7540(a)(10) | §63.7555(a)<br>§63.7555(a)(1)<br>§63.7560(a)<br>§63.7560(b)<br>§63.7560(c) | §63.7530(e)<br>§63.7530(f)<br>§63.7545(a)<br>§63.7545(b)<br>§63.7545(c)<br>[G]§63.7545(e)<br>§63.7550(a)<br>[G]§63.7550(b)<br>[G]§63.7550(c)<br>[G]§63.7550(h) |
|              | PM01                      | R1111-1           | PM(OPACITY) | [G]§111.111 (a)(1)(F)   |  |  |
|              | STARCH                    | R1151-1           | PM          |   |  |  |
|              | TURBINEV                  | R1111-1           | PM(OPACITY) | [G]§111.111 (a)(1)(F)   |  |  |

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program  
Table 1b: Additions**

|  |   |                        |
|--|---|------------------------|
| <b>Date:</b> 04/25/2024                                  | <b>Regulated Entity No.:</b> RN111634507                    | <b>Permit No.:</b> TBA |
| <b>Company Name:</b> Graphic Packaging International LLC | <b>Area Name:</b> Graphic Packaging International Waco Mill |                        |

| Revision No. | Unit/Group/Process ID No. | SOP/GOP Index No. | Pollutant       | Monitoring and Testing Requirements   | Recordkeeping Requirements | Reporting Requirements  |
|--------------|---------------------------|-------------------|-----------------|---|----------------------------|---|
|              | TURBINE                   | 60KKKK-1          | NO <sub>x</sub> | [G]§60.4400(a)<br>§60.4400(b)<br>§60.4400(b)(1)<br>§60.4400(b)(2)<br>§60.4400(b)(4)<br>§60.4400(b)(5)<br>§60.4400(b)(6)<br>§60.4335(b)(1)<br>[G]§60.4345<br>§60.4350(a)<br>§60.4350(b)<br>§60.4350(d)<br>§60.4350(e)<br>§60.4350(f)<br>§60.4350(h)<br>[G]§60.4405 | [G]§60.4345<br>§60.4350(b) | [G]§60.4345<br>§60.4350(d)<br>§60.4375(a)<br>§60.4380<br>[G]§60.4380(b)<br>§60.4395 |
|              | TURBINE                   | 60KKKK-1          | SO <sub>2</sub> | §60.4415(a)<br>§60.4415(a)(1)<br>§60.4370(b)  | §60.4370(b)                |   |

**Applicable Requirements Summary  
Form OP-REQ3 (Page 2)  
Federal Operating Permit Program  
Table 1b: Additions**

|  |   |                        |
|--|---|------------------------|
| <b>Date:</b> 04/25/2024                                  | <b>Regulated Entity No.:</b> RN111634507                    | <b>Permit No.:</b> TBA |
| <b>Company Name:</b> Graphic Packaging International LLC | <b>Area Name:</b> Graphic Packaging International Waco Mill |                        |

| Revision No. | Unit/Group/Process ID No. | SOP/GOP Index No. | Pollutant | Monitoring and Testing Requirements   | Recordkeeping Requirements   | Reporting Requirements   |
|--------------|---------------------------|-------------------|-----------|---|--|--|
|              | TURBINE                   | 60KKKK-1          | HAPS      | §63.6110(a)<br>[G] §63.6110(b)<br>§63.6115<br>§63.6135(a)<br>§63.6140(a)-Table 5.1<br>§63.6140(a)-Table 5.2<br>§63.6145(e)<br>§63.6145(f) | §63.6135(b)<br>§63.6155(a)<br>§63.6155(a)(1)<br>§63.6155(a)(2)<br>§63.6155(a)(5)<br>§63.6155(a)(6)<br>[G]§63.6155(a)(7)<br>§63.6155(c)<br>§63.6155(d)<br>§63.6160(a)<br>§63.6160(b)<br>§63.6160(c) | §63.6130(b)<br>§63.6140(b)<br>§63.6145(a)<br>§63.6145(b)<br>§63.6145(c)<br>§63.6145(e)<br>§63.6145(f)<br>§63.6150(a)<br>[G]§63.6150(a)(5)<br>§63.6150(a)-Table 6.1<br>§63.6150(a)-Table 6.3.1<br>§63.6150(a)-Table 6.3.2<br>§63.6150(a)-Table 6.3.3<br>[G]§63.6150(b)<br>[G]§63.6150(d)<br>[G]§63.6150(e)<br>[G]§63.6150(f)<br>§63.6150(g)<br>[G]§63.6150(h)<br>[G]§63.6150(i) |

## **7. COMPLIANCE ASSURANCE MONITORING AND PERIODIC MONITORING**

As part of this initial application, GPI is addressing CAM and periodic monitoring requirements for the Waco Mill.

CAM is a Federal program established under 40 CFR Part 64 regulations. The regulatory requirements governing implementation of CAM in Texas are also established in 30 TAC Chapter 122, Subchapter G. CAM applies to an emissions unit located at a major source that meets all of the following:

- The emissions unit is subject to an emissions limitation or standard for an air pollutant in an applicable requirement;
- The emissions unit uses a control device to achieve compliance with the applicable emissions limitation or standard; and
- The emissions unit has the pre-control potential-to-emit greater than or equal to the amount in tons per year required for the site to be classified as a major source.

CAM applicability is determined on a pollutant-by-pollutant basis. Please note that 30 TAC §122.604(c) and (d) include CAM exemptions for certain emissions limitations or standards and certain utility units. For example, CAM does not apply to emissions limitations or standards proposed by U.S. EPA after November 15, 1990 under the Federal Clean Air Act Sections §111 (Standards of Performance for New Stationary Sources) or §112 (Hazardous Air Pollutants). Additionally, CAM does not apply to emissions limitations or standards for which the applicable requirement specifies a continuous compliance determination method.

CAM applicability is determined for the emissions unit, not the control device. Sites are required to address CAM as part of the Title V initial application process. As such, Form OP-MON has been included with CAM proposals for the units, pollutants, and emissions standards identified in

**Table 7-1**  
**Summary of Proposed CAM**

| Unit ID | Control Device ID | Pollutant | Standard    | Monitoring    |              |                  |
|---------|-------------------|-----------|-------------|---------------|--------------|------------------|
|         |                   |           |             | Indicator     | Frequency    | Averaging Period |
| STARCH  | FILTER1           | PM        | §111.151(a) | Pressure Drop | Once per Day | N/A              |

Periodic monitoring is a federal monitoring program established under 40 CFR Part 70 regulations. The regulatory requirements governing implementation of periodic monitoring in Texas are also established in 30 TAC Chapter 122, Subchapter G. An emissions unit will require periodic monitoring for an emissions limitation or standard when the regulation does not specify sufficient monitoring to determine compliance with the applicable requirement. Form OP-MON has been included to document periodic monitoring at the Waco Mill for the units, pollutants, and emissions standards identified in Table 7-2.

**Table 7-2**  
**Summary of Proposed Periodic Monitoring**

| Unit ID    | Control Device ID | Pollutant | Standard          | Monitoring        |                           |                  |
|------------|-------------------|-----------|-------------------|-------------------|---------------------------|------------------|
|            |                   |           |                   | Indicator         | Frequency                 | Averaging Period |
| TURBINE    | N/A               | Opacity   | §111.111(a)(1)(C) | Visible Emissions | Once per calendar quarter | N/A              |
| BYPASS     | N/A               | Opacity   | §111.111(a)(1)(C) | Visible Emissions | Once per calendar quarter | N/A              |
| PMFEASV    | N/A               | Opacity   | §111.111(a)(1)(C) | Visible Emissions | Once per calendar quarter | N/A              |
| COOLINGTWR | N/A               | Opacity   | §111.111(a)(1)(C) | Visible Emissions | Once per calendar quarter | N/A              |

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

|  |                            |                        |
|--|----------------------------|------------------------|
| <b>I. Identifying Information</b>  |                            |                        |
| Account No.:   | RN No.: <b>RN111634507</b> | CN: <b>CN601710460</b> |
| Permit No.: <b>TBA</b>   | Project No.: <b>TBA</b>    |                        |
| Area Name: <b>Graphic Packaging International Waco Mill</b>  |                            |                        |
| Company Name: <b>Graphic Packaging International, LLC</b>  |                            |                        |
| <b>II. Unit/Emission Point/Group/Process Information</b>   |                            |                        |
| Revision No.:  |                            |                        |
| Unit/EPN/Group/Process ID No.: <b>STARCH</b>   |                            |                        |
| Applicable Form: <b>OP-UA15</b>  |                            |                        |
| <b>III. Applicable Regulatory Requirement</b>  |                            |                        |
| Name: <b>30 TAC Chapter 111</b>  |                            |                        |
| SOP/GOP Index No.: <b>R1151-1</b>  |                            |                        |
| Pollutant: <b>PM</b>   |                            |                        |
| Main Standard: <b>§111.151(a)</b>  |                            |                        |
| <b>IV. Title V Monitoring Information</b>  |                            |                        |
| Monitoring Type: <b>CAM</b>  |                            |                        |
| Unit Size: <b>SM</b>   |                            |                        |
| CAM/PM Option No.: <b>CAM-FF-002</b>   |                            |                        |
| Deviation Limit:<br><b>Minimum Pressure Drop = 2 inches W.C</b><br><b>Maximum Pressure Drop = 6 inches W.C</b> |                            |                        |
| <b>V. Control Device Information</b>   |                            |                        |
| Control Device ID No.: <b>FILTER1</b>  |                            |                        |
| Control Device Type: <b>FABFLT</b>   |                            |                        |

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|   |                            |                         |
|---|----------------------------|-------------------------|
| <b>I. Identifying Information</b>   |                            |                         |
| Account No.:  | RN No.: <b>RN111634507</b> | CN: <b>CN601710460</b>  |
| Permit No: <b>TBA</b>   |                            | Project No.: <b>TBA</b> |
| Area Name: <b>Graphic Packaging International Waco Mill</b>   |                            |                         |
| Company Name: <b>Graphic Packaging International, LLC</b>   |                            |                         |
| <b>II. Unit/Emission Point/Group/Process Information</b>  |                            |                         |
| Revision No.:   |                            |                         |
| Unit/EPN/Group/Process ID No.: <b>TURBINE</b>   |                            |                         |
| Applicable Form: <b>OP-UA15</b>   |                            |                         |
| <b>III. Applicable Regulatory Requirement</b>   |                            |                         |
| Name: <b>30 TAC Chapter 111</b>   |                            |                         |
| SOP/GOP Index No.: <b>R1111-1</b>   |                            |                         |
| Pollutant: <b>PM (OPACITY)</b>  |                            |                         |
| Main Standard: <b>§111.111(a)(1)(C)</b>   |                            |                         |
| Monitoring Type: <b>PM</b>  |                            |                         |
| Deviation Limit: <b>The presence of visible emissions indicates a deviation unless a Method 9 Observation is completed within 24 hours to establish that opacity is below 7%.</b> |                            |                         |
| <b>IV. Control Device Information</b>   |                            |                         |
| Control Device ID No.: <b>N/A</b>   |                            |                         |
| <b>V. CAM Case-by-case</b>  |                            |                         |
| Indicator:  |                            |                         |
| Minimum Frequency:  |                            |                         |
| Averaging Period:   |                            |                         |
| QA/QC Procedures:   |                            |                         |
| Verification Procedures:  |                            |                         |
| Representative Date:  |                            |                         |

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| VI. Periodic Monitoring Case-by-case   |   |
|--|---|
| Indicator: <b>Visible Emissions</b>  | Minimum Frequency: <b>Once per Calendar Quarter</b> |
| Averaging Period: <b>N/A</b>   |   |
| Periodic Monitoring Text:<br><b><i>Visible emissions observations shall be made and recorded. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 miles, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor.</i></b><br><br><b><i>If visible emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If a Test Method 9 is performed, the opacity limit is the corresponding opacity limit associated with the particulate matter standard in the underlying applicable requirement. If there is no corresponding opacity limit in the underlying applicable requirement, the maximum opacity will be established using the most recent performance test. If the result of the Test Method 9 is opacity above the corresponding opacity limit (associated with the particulate matter standard in the underlying applicable requirement or as identified as a result of a previous performance test to establish the maximum opacity limit), the permit holder shall report a deviation.</i></b> |   |

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| <b>I. Identifying Information</b>   |                            |                         |
| Account No.:  | RN No.: <b>RN111634507</b> | CN: <b>CN601710460</b>  |
| Permit No: <b>TBA</b>   |                            | Project No.: <b>TBA</b> |
| Area Name: <b>Graphic Packaging International Waco Mill</b>   |                            |                         |
| Company Name: <b>Graphic Packaging International, LLC</b>   |                            |                         |
| <b>II. Unit/Emission Point/Group/Process Information</b>  |                            |                         |
| Revision No.:   |                            |                         |
| Unit/EPN/Group/Process ID No.: <b>PM01</b>  |                            |                         |
| Applicable Form: <b>OP-UA15</b>   |                            |                         |
| <b>III. Applicable Regulatory Requirement</b>   |                            |                         |
| Name: <b>30 TAC Chapter 111</b>   |                            |                         |
| SOP/GOP Index No.: <b>R1111-1</b>   |                            |                         |
| Pollutant: <b>PM (OPACITY)</b>  |                            |                         |
| Main Standard: <b>§111.111(a)(1)(C)</b>   |                            |                         |
| Monitoring Type: <b>PM</b>  |                            |                         |
| Deviation Limit: <b>The presence of visible emissions indicates a deviation unless a Method 9 Observation is completed within 24 hours to establish that opacity is below 7%.</b> |                            |                         |
| <b>IV. Control Device Information</b>   |                            |                         |
| Control Device ID No.: <b>N/A</b>   |                            |                         |
| <b>V. CAM Case-by-case</b>  |                            |                         |
| Indicator:  |                            |                         |
| Minimum Frequency:  |                            |                         |
| Averaging Period:   |                            |                         |
| QA/QC Procedures:   |                            |                         |
| Verification Procedures:  |                            |                         |
| Representative Date:  |                            |                         |

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|   |   |
|---|---|
| <b>VI. Periodic Monitoring Case-by-case</b>   |   |
| Indicator: <b>Visible Emissions</b>   | Minimum Frequency: <b>Once per Calendar Quarter</b> |
| Averaging Period: <b>N/A</b>  |   |
| <p>Periodic Monitoring Text:</p> <p><b>Visible emissions observations shall be made and recorded. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 miles, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor.</b></p> <p><b>If visible emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If a Test Method 9 is performed, the opacity limit is the corresponding opacity limit associated with the particulate matter standard in the underlying applicable requirement. If there is no corresponding opacity limit in the underlying applicable requirement, the maximum opacity will be established using the most recent performance test. If the result of the Test Method 9 is opacity above the corresponding opacity limit (associated with the particulate matter standard in the underlying applicable requirement or as identified as a result of a previous performance test to establish the maximum opacity limit), the permit holder shall report a deviation.</b></p> |   |

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| <b>I. Identifying Information</b>   |                            |                         |
| Account No.:  | RN No.: <b>RN111634507</b> | CN: <b>CN601710460</b>  |
| Permit No: <b>TBA</b>   |                            | Project No.: <b>TBA</b> |
| Area Name: <b>Graphic Packaging International Waco Mill</b>   |                            |                         |
| Company Name: <b>Graphic Packaging International, LLC</b>   |                            |                         |
| <b>II. Unit/Emission Point/Group/Process Information</b>  |                            |                         |
| Revision No.:   |                            |                         |
| Unit/EPN/Group/Process ID No.: <b>BYPASS</b>  |                            |                         |
| Applicable Form: <b>OP-UA15</b>   |                            |                         |
| <b>III. Applicable Regulatory Requirement</b>   |                            |                         |
| Name: <b>30 TAC Chapter 111</b>   |                            |                         |
| SOP/GOP Index No.: <b>R1111-1</b>   |                            |                         |
| Pollutant: <b>PM (OPACITY)</b>  |                            |                         |
| Main Standard: <b>§111.111(a)(1)(C)</b>   |                            |                         |
| Monitoring Type: <b>PM</b>  |                            |                         |
| Deviation Limit: <b>The presence of visible emissions indicates a deviation unless a Method 9 Observation is completed within 24 hours to establish that opacity is below 7%.</b> |                            |                         |
| <b>IV. Control Device Information</b>   |                            |                         |
| Control Device ID No.: <b>N/A</b>   |                            |                         |
| <b>V. CAM Case-by-case</b>  |                            |                         |
| Indicator:  |                            |                         |
| Minimum Frequency:  |                            |                         |
| Averaging Period:   |                            |                         |
| QA/QC Procedures:   |                            |                         |
| Verification Procedures:  |                            |                         |
| Representative Date:  |                            |                         |

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| VI. Periodic Monitoring Case-by-case   |   |
|--|---|
| Indicator: <b>Visible Emissions</b>  | Minimum Frequency: <b>Once per Calendar Quarter</b> |
| Averaging Period: <b>N/A</b>   |   |
| Periodic Monitoring Text:<br><b><i>Visible emissions observations shall be made and recorded. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 miles, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor.</i></b><br><br><b><i>If visible emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If a Test Method 9 is performed, the opacity limit is the corresponding opacity limit associated with the particulate matter standard in the underlying applicable requirement. If there is no corresponding opacity limit in the underlying applicable requirement, the maximum opacity will be established using the most recent performance test. If the result of the Test Method 9 is opacity above the corresponding opacity limit (associated with the particulate matter standard in the underlying applicable requirement or as identified as a result of a previous performance test to establish the maximum opacity limit), the permit holder shall report a deviation.</i></b> |   |

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| <b>I. Identifying Information</b>   |                            |                         |
| Account No.:  | RN No.: <b>RN111634507</b> | CN: <b>CN601710460</b>  |
| Permit No: <b>TBA</b>   |                            | Project No.: <b>TBA</b> |
| Area Name: <b>Graphic Packaging International Waco Mill</b>   |                            |                         |
| Company Name: <b>Graphic Packaging International, LLC</b>   |                            |                         |
| <b>II. Unit/Emission Point/Group/Process Information</b>  |                            |                         |
| Revision No.:   |                            |                         |
| Unit/EPN/Group/Process ID No.: <b>COOLINGTWR</b>  |                            |                         |
| Applicable Form: <b>OP-UA15</b>   |                            |                         |
| <b>III. Applicable Regulatory Requirement</b>   |                            |                         |
| Name: <b>30 TAC Chapter 111</b>   |                            |                         |
| SOP/GOP Index No.: <b>R1111-1</b>   |                            |                         |
| Pollutant: <b>PM (OPACITY)</b>  |                            |                         |
| Main Standard: <b>§111.111(a)(1)(C)</b>   |                            |                         |
| Monitoring Type: <b>PM</b>  |                            |                         |
| Deviation Limit: <b>The presence of visible emissions indicates a deviation unless a Method 9 Observation is completed within 24 hours to establish that opacity is below 7%.</b> |                            |                         |
| <b>IV. Control Device Information</b>   |                            |                         |
| Control Device ID No.: <b>N/A</b>   |                            |                         |
| <b>V. CAM Case-by-case</b>  |                            |                         |
| Indicator:  |                            |                         |
| Minimum Frequency:  |                            |                         |
| Averaging Period:   |                            |                         |
| QA/QC Procedures:   |                            |                         |
| Verification Procedures:  |                            |                         |
| Representative Date:  |                            |                         |

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| VI. Periodic Monitoring Case-by-case   |   |
|--|---|
| Indicator: <b>Visible Emissions</b>  | Minimum Frequency: <b>Once per Calendar Quarter</b> |
| Averaging Period: <b>N/A</b>   |   |
| Periodic Monitoring Text:<br><b>Visible emissions observations shall be made and recorded. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 miles, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor.</b><br><br><b>If visible emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If a Test Method 9 is performed, the opacity limit is the corresponding opacity limit associated with the particulate matter standard in the underlying applicable requirement. If there is no corresponding opacity limit in the underlying applicable requirement, the maximum opacity will be established using the most recent performance test. If the result of the Test Method 9 is opacity above the corresponding opacity limit (associated with the particulate matter standard in the underlying applicable requirement or as identified as a result of a previous performance test to establish the maximum opacity limit), the permit holder shall report a deviation.</b> |   |



## **8. COMPLIANCE AND CERTIFICATION**

30 TAC §122.132(d)(4) requires that each SOP application includes a Compliance Plan, a Compliance Certification, and, if necessary, a Compliance Schedule. Form OP-ACPS: Application Compliance and Schedule is included in this section to fulfill this requirement.

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

|   |  |   |
|---|--|---|
| <b>Date:</b> 08/09/2024                                   | <b>Regulated Entity No.:</b> RN111634507 | <b>Permit No.:</b> TBA                                      |
| <b>Company Name:</b> Graphic Packaging International, LLC |  | <b>Area Name:</b> Graphic Packaging International Waco 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:<br/>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*<br/>(Indicate response by entering an “X” in the appropriate column)</b>   |   |
| <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>* <i>For Site Operating Permits (SOPs), the complete application should be consulted for applicable requirements and their corresponding emission units when assessing compliance status.<br/>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.</i></p> <p><i>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.</i></p> |   |