

## Ryan Glaze

---

**From:** Jason Nall <Jason.Nall@kohler.com>  
**Sent:** Thursday, May 15, 2025 2:07 PM  
**To:** Ryan Glaze; Ideris, Alan  
**Cc:** Halageri, Natasha; McKay, Stephanie  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

My apologies. I will follow up personally with the plant manager to make this happen by the end of this week. Hopefully today yet.

Thank You,

Jason

**Jason Nall, P.E.\***

Manager - Global EHS

Kohler Co.

Cell: 920.226.8046

Email: [jason.nall@kohler.com](mailto:jason.nall@kohler.com)

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\*Professional Engineer in WI

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**From:** Ryan Glaze <James.Glaze@tceq.texas.gov>  
**Sent:** Thursday, May 15, 2025 1:46 PM  
**To:** Ideris, Alan <Alderis@trccompanies.com>  
**Cc:** Halageri, Natasha <NHalageri@trccompanies.com>; Jason Nall <Jason.Nall@kohler.com>; McKay, Stephanie <SMcKay@trccompanies.com>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Good afternoon Alan,

I just wanted to know how it was going to get the STEERS documentation signed. I have the public notice package ready to go out but until I get the STEERS submission I cannot do so. If you need more time or have any questions, please let me know.

Thanks,

***Ryan Glaze***

Operating Permits Section

Air Permits Division

Texas Commission on Environmental Quality  
P.O. Box 13087 MC 163  
Austin, TX, 78711  
(512) 239-6212



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**From:** Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>  
**Sent:** Friday, May 9, 2025 4:41 PM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>; Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; McKay, Stephanie <[SMcKay@trccompanies.com](mailto:SMcKay@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

I believe the STEERS upload still needs to be signed, I will get back with you.

Thanks,

Alan "A.J." Ideris  
Houston Office Practice Leader – Air Quality Consulting  
Environmental, Health, Safety, and Sustainability Practice



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[LinkedIn](#) | [Instagram](#) | [TRCcompanies.com](http://TRCcompanies.com)

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Thursday, May 8, 2025 4:23 PM  
**To:** Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>  
**Cc:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>; Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; McKay, Stephanie <[SMcKay@trccompanies.com](mailto:SMcKay@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Good afternoon Alan,

I just wanted to confirm that the updated OP-PBR SUP has been submitted to STEERS. I have gotten approval to send out the public notice package however I haven't received the updated OP-PBR SUP in STEERS yet. If you could please provide an update on this that would be great.

Thanks,

***Ryan Glaze***

Operating Permits Section  
Air Permits Division  
Texas Commission on Environmental Quality  
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(512) 239-6212



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**From:** Ryan Glaze  
**Sent:** Tuesday, April 22, 2025 9:49 AM  
**To:** Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>  
**Cc:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>; Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; McKay, Stephanie <[SMcKay@trccompanies.com](mailto:SMcKay@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Good morning Alan,

Thank you for letting me know about this, with that in mind if you haven't done so already, please submit the updated OP-PBRSUP to certify the documented. Once that is done and I get final approval from my team leader we should be ready to send out our project. Please let me know if you have any questions.

Thanks,

***Ryan Glaze***

Operating Permits Section  
Air Permits Division  
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(512) 239-6212



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**From:** Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>  
**Sent:** Monday, April 21, 2025 4:18 PM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>; Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; McKay, Stephanie <[SMcKay@trccompanies.com](mailto:SMcKay@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Good Afternoon Mr. Glaze,

It turns out that PBR Registration No. 87554 is not associated with O2711, but rather OP2712, so it is already covered in that Title V permit.

Thanks,

Alan "A.J." Ideris

Houston Office Practice Leader – Air Quality Consulting  
Environmental, Health, Safety, and Sustainability Practice



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**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Sent:** Tuesday, April 15, 2025 4:29 PM

**To:** Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>

**Cc:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>; Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; McKay, Stephanie <[SMcKay@trccompanies.com](mailto:SMcKay@trccompanies.com)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Greetings,

There was an issue found on the OP-PBRSUP that I didn't realize until recently. The facility has a PBR Registration 87554 that is missing from the OP-PBRSUP. Can you please make sure that this registration is still active and if so, please put it on the OP-PBRSUP.

Additionally, the PBR associated with that registration is 106.433. This PBR currently isn't on the permit or on the REQ1 page 89. If you could please submit an OP-REQ1 page 89 with that PBR listed to that form.

If you could please have this updated form back to me by **April 23, 2025** that would be great. I apologize for this inconvenience and error on my part. Please let me know if you have any questions.

Thanks,

***Ryan Glaze***

Operating Permits Section

Air Permits Division

Texas Commission on Environmental Quality

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**From:** Ryan Glaze

**Sent:** Tuesday, April 8, 2025 2:34 PM

**To:** Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>

**Cc:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>; Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; McKay, Stephanie <[SMcKay@trccompanies.com](mailto:SMcKay@trccompanies.com)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Greetings Alan,

Thank you for the updated OP-PBRSUP. If you could please go ahead and submit this updated document to STEERS to certify the document that would be great.

Thanks,

***Ryan Glaze***

Operating Permits Section

Air Permits Division

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**From:** Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>

**Sent:** Tuesday, April 8, 2025 1:25 PM

**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Cc:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>; Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; McKay, Stephanie <[SMcKay@trccompanies.com](mailto:SMcKay@trccompanies.com)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Hello Ryan,

We appreciate your review. Please see the attached updated OP-PBRSUP.

Regards,

**Alan "A.J." Ideris**

Houston Office Practice Leader – Air Quality Consulting

Environmental, Health, Safety, and Sustainability Practice



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[LinkedIn](#) | [Instagram](#) | [TRCcompanies.com](http://TRCcompanies.com)

---

**From:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Sent:** Tuesday, March 25, 2025 11:21 AM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>; Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Thank you Ryan.

-Jason

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**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Tuesday, March 25, 2025 11:04 AM  
**To:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Cc:** Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>; Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Greetings Jason,

That would be perfectly fine to do so. The new deadline will be documented as Tuesday, April 8<sup>th</sup>. Thank you for keeping me informed.

Thanks,

***Ryan Glaze***

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**From:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Sent:** Tuesday, March 25, 2025 11:01 AM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>; Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

I just received away messages from both AJ and Natasha with my reply to your e-mail. Looks like AJ is coming back from vacation March 31<sup>st</sup>. Can we extend the response to your requested addendums a week later to Tuesday, April 8<sup>th</sup>?

Please let me know if this date is suitable or if you would prefer it sooner.

Thank You,

Jason Nall

**Jason Nall, P.E.\***  
Manager - Global EHS  
Kohler Co.  
Cell: 920.226.8046  
Email: [jason.nall@kohler.com](mailto:jason.nall@kohler.com)  
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\*Professional Engineer in WI

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**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Tuesday, March 25, 2025 10:55 AM  
**To:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

Greetings Jason,

Thank you so much for the help.

Thanks,

***Ryan Glaze***  
Operating Permits Section  
Air Permits Division  
Texas Commission on Environmental Quality  
P.O. Box 13087 MC 163  
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**From:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>

**Sent:** Tuesday, March 25, 2025 10:54 AM

**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>; Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>

**Cc:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

I am forwarding your message to AJ Ideris (TRC). AJ will be in receipt and respond to Natasha's e-mails and questions regarding open projects while she is on maternity leave.

Thank You,

Jason Nall

**Jason Nall, P.E.\***

Manager - Global EHS

Kohler Co.

Cell: 920.226.8046

Email: [jason.nall@kohler.com](mailto:jason.nall@kohler.com)

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\*Professional Engineer in WI

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**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Sent:** Tuesday, March 25, 2025 10:26 AM

**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Greetings Natasha,

During the final stages of review, it was noticed that PBR 106.472 is missing from the OP-PBRSUP. If you could please add PBR 106.472 to Tables A & D to that form and send it to me by **Tuesday (April 1<sup>st</sup>)**. Once that is done if you could please submit the updated OP-PBRSUP to STEERS that would be great. If you have any questions about the permit, please let me know.

Thanks,

***Ryan Glaze***

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**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Sent:** Friday, February 7, 2025 11:57 AM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

Yes, that is correct.

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Friday, February 7, 2025 11:03 AM  
**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

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Greetings Natsha,

Just to confirm I noticed on the OP-PRBSUP and OP-REQ1 page 89 that PBRs 106.265, SE11, SE40, and SE86 are no longer listed on the document. Does this mean that those PBRs are not longer active at the site. I just need to know so I can remove them from the permit if that is the case.

Thanks,

Ryan

---

**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Sent:** Friday, February 7, 2025 10:47 AM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

Hello Ryan,

Please see attached the updated forms. Let me know if you need anything else.

Thanks,  
Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Monday, February 3, 2025 2:36 PM  
**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Greetings Natasha,

Just to follow up on the question that I wasn't fully sure on. Yes, Standard Exception must be listed on the PBRSUP. The reason is we must know where each PBRs is being used for each unit attached to that PBR. Just wanted to follow up to give you a more definitive answer after consulting with my mentor about it. If you have any questions, please let me know. I look forward to getting the documents from you on Thursday.

Thanks,

***Ryan Glaze***

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Air Permits Division  
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**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Sent:** Monday, February 3, 2025 2:04 PM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Hello Ryan,

Can we talk about these questions? I am a little confused since the PBRs do not match the forms.

Thanks,  
Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Thursday, January 30, 2025 8:38 AM  
**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Good morning Natasha,

I found something that needs to be addressed.

You have a PBR no. 106.264 listed on the OP-PBRSUP however it is not listed on the OP-REQ1 page 87. For 106.264 in needs to be added to the OP-REQ1 to show that it is being used on the permit. please put the PBR no. 106.264 on OP-REQ1 to make sure that it can be added to the permit. As of right now this PBR is not listed on the permit.

Additionally, other PBRs that have been issued are on the permit, however they're not on the OP-PBRSUP. If you could please add those PBRs (106.183, 106.265, 106.472, 3, 7, 11, 40, and 86) to the PBRSUP along with the units associated with those PBRs.

If you could please provide an update to this information to me by **Monday February 3, 2025** that would be great.

Thanks,

***Ryan Glaze***

Operating Permits Section  
Air Permits Division  
Texas Commission on Environmental Quality  
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**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Sent:** Tuesday, January 28, 2025 1:11 PM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>  
**Subject:** Re: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

No this renewal is not being incorporated since it is still pending issuance

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**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Tuesday, January 28, 2025 1:09:01 PM  
**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Greetings Natasha,

That is great to hear! One final thing, I noticed that there is a pending renewal application for NSR authorization number 6414. I wanted to know if this renewal is being incorporated in this minor revision.

Thanks,

Ryan Glaze

---

**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Sent:** Tuesday, January 28, 2025 1:06 PM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Hello Ryan,

We submitted the updated forms via STEERS. Let me know if you need anything else.

Thanks,  
Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Thursday, January 23, 2025 3:34 PM  
**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant



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Hi Natasha,

Great! Thank you so much for the update. Some final things that I just wanted to make sure of before continuing with your permit. I noticed that there is a pending renewal application for NSR authorization number 6414. I wanted to know if this renewal is being incorporated in this minor revision. Additionally, if you could please submit the OP-UA66 and the final OP-CRO1 forms to STEERS if you have not done so already. If you could please have this done for me my **January 29, 2025** that would be great. If you have any questions for me, please let me know.

Thanks,

***Ryan Glaze***

Operating Permits Section

Air Permits Division

Texas Commission on Environmental Quality

P.O. Box 13087 MC 163

Austin, TX, 78711

(512) 239-6212



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---

**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Sent:** Thursday, January 23, 2025 9:51 AM

**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

We reviewed the updated draft permit and are good with the conditions.

Thanks,  
Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Sent:** Friday, January 17, 2025 4:49 PM

**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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**ALWAYS** hover over the link to preview the actual URL/site and confirm its legitimacy.

Greetings Natasha,

I have attached your updated Draft permit. If you have any questions going forward, please feel free to reach out to me.

Have a good weekend,

Ryan Glaze

---

**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Sent:** Friday, January 17, 2025 8:48 AM

**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

Please see attached.

Thanks,  
Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Sent:** Thursday, January 16, 2025 3:59 PM

**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Greetings Natasha,

It seems the OP-UA66 form was filled out incorrectly, the compliance option given (5810-C) should have had you go and fill out the CMS question of either yes or no. 95% reduction, affected source type, facility type, large parts, and operation type does not have to be answer.

I have attached the original OP-UA66 that was submitted with the initial application. The way that you have it filled out there is correct.

If you could do the same for units E080-084 and E110-113 that should do it. If you could please have these updates to me by **next Thursday (January 23, 2025)** that would be great. If you have any questions about what I am asking, please let me know.

Thanks,

***Ryan Glaze***

Operating Permits Section

Air Permits Division

Texas Commission on Environmental Quality

P.O. Box 13087 MC 163

Austin, TX, 78711

(512) 239-6212



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---

**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Sent:** Thursday, January 16, 2025 10:46 AM

**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

Please see attached the updated OP-UA66 form for your review.

Let me know if you need anything else from us.

Thanks,  
Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Sent:** Thursday, January 9, 2025 3:13 PM

**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Greetings,

I am following up based on our call yesterday afternoon. Based on your comments in the call, you plan to readd Unit IDs E110, E111, E112, and E113 to the permit since they are still in operation. Additionally, we discussed updated the high level applicability to MACT WWW that remains in the permit for Unit IDs E80, E81, E82, E83, and E-84. Please submit an updated form OP-UA66, Table 1 for each of the units listed above (both the E110 series and E80 series units). Once I have received the updates, I will update the draft permit and send you the updated copy. If you could have these updates to me by **January 17, 2025** that would be great.

Please let me know if you have any questions

Thanks,

***Ryan Glaze***

Operating Permits Section

Air Permits Division

Texas Commission on Environmental Quality

P.O. Box 13087 MC 163

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(512) 239-6212



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---

**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Sent:** Friday, December 20, 2024 3:36 PM

**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

We are open the morning of Monday, Jan. 6, or the afternoons of Jan. 7 and 8. Let me know if these slots work for you.

Thanks,  
Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Sent:** Friday, December 20, 2024 10:23 AM

**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

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**ALWAYS** hover over the link to preview the actual URL/site and confirm its legitimacy.

Greetings Natasha,

Yes, I'm able to give an extension till January 15, 2025. When it comes to setting up a teams meeting if you can tell me what days during week of January 6 that you are available to meet I should be able to set up a teams meeting for us during that time. Once I get your response, I should have the teams meetings information sent out by Monday of next week. If you have any other questions, please let me know.

Thanks,

Ryan Glaze

---

**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Sent:** Friday, December 20, 2024 9:33 AM

**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

We have reviewed the draft SOP and had a few questions which we would like to discuss with you over a Teams call. Due to the holidays, we are not available for the next 2 weeks and wanted to schedule a call for the week of January 6. Once we resolve our issues over the call, we can provide our responses.

As such, can you please provide us an extension to provide our responses till January 15, 2025?

Thanks,  
Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Sent:** Tuesday, December 17, 2024 9:30 AM

**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Cc:** Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>

**Subject:** [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

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**ALWAYS** hover over the link to preview the actual URL/site and confirm its legitimacy.

Greetings,

I have conducted a technical review of minor revision application for Kohler Co./Brownwood Plant. 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 on the working draft permit by Due Date **January 3, 2025**.

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,

***Ryan Glaze***

Operating Permits Section

Air Permits Division

Texas Commission on Environmental Quality

P.O. Box 13087 MC 163

Austin, TX, 78711

(512) 239-6212



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## Texas Commission on Environmental Quality

Title V Existing

2711

### Site Information (Regulated Entity)

|   |   |
|---|---|
| What is the name of the permit area to be authorized? | KOHLER PLASTICS PLANT                   |
| Does the site have a physical address?                | Yes                                     |
| Physical Address                                      |   |
| Number and Street                                     | 4601 HIGHWAY 377 S                      |
| City  | BROWNWOOD                               |
| State   | TX                                      |
| ZIP   | 76801                                   |
| County  | BROWN                                   |
| Latitude (N) (##.#####)                               | 31.663888                               |
| Longitude (W) (-###.#####)                            | 98.996944                               |
| Primary SIC Code                                      | 3261                                    |
| Secondary SIC Code                                    |   |
| Primary NAICS Code                                    | 327110                                  |
| Secondary NAICS Code                                  |   |
| Regulated Entity Site Information                     |   |
| What is the Regulated Entity's Number (RN)?           | RN102560372                             |
| What is the name of the Regulated Entity (RE)?        | KOHLER BROWNWOOD VITREOUS PLANT         |
| Does the RE site have a physical address?             | Yes                                     |
| Physical Address                                      |   |
| Number and Street                                     | 4601 HIGHWAY 377 S                      |
| City  | BROWNWOOD                               |
| State   | TX                                      |
| ZIP   | 76801                                   |
| County  | BROWN                                   |
| Latitude (N) (##.#####)                               | 31.664722                               |
| Longitude (W) (-###.#####)                            | -98.9975                                |
| Facility NAICS Code                                   |   |
| What is the primary business of this entity?          | INDUSTRIAL CHEMICAL MANUFACTURING PLANT |



## Customer (Applicant) Information

|  |                |
|--|----------------|
| How is this applicant associated with this site? | Owner Operator |
| What is the applicant's Customer Number (CN)?    | CN600127039    |
| Type of Customer                                 | Corporation    |
| Full legal name of the applicant:                |                |
| Legal Name                                       | Kohler Co.     |
| Texas SOS Filing Number                          | 673606         |
| Federal Tax ID                                   | 390402810      |
| State Franchise Tax ID                           | 13904028100    |
| State Sales Tax ID                               |                |
| Local Tax ID                                     |                |
| DUNS Number                                      | 6073225        |
| Number of Employees                              | 501+           |
| Independently Owned and Operated?                | Yes            |

## Responsible Official Contact

|  |                         |
|--|-------------------------|
| Person TCEQ should contact for questions about this application: |                         |
| Organization Name  | KOHLER CO               |
| Prefix   | MR                      |
| First  | DALE                    |
| Middle   |                         |
| Last   | LEPP                    |
| Suffix   |                         |
| Credentials  |                         |
| Title  | PLASTICS SUPERINTENDENT |
| Enter new address or copy one from list:                         |                         |
| Mailing Address  |                         |
| Address Type   | Domestic                |
| Mailing Address (include Suite or Bldg. here, if applicable)     | 4601 HIGHWAY 377 S      |
| Routing (such as Mail Code, Dept., or Attn:)                     |                         |
| City   | BROWNWOOD               |
| State  | TX                      |
| ZIP  | 76801                   |

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

3252032186

Extension

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

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

3256415834

E-mail

dale.lepp@kohler.com

## Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application

Select existing DAR contact or enter a new contact.

New Contact

Organization Name

Kohler Co

Prefix

MS

First

Randi

Middle

Last

Schmidling

Suffix

Credentials

Title

EHS Manager

Enter new address or copy one from list

Mailing Address

Address Type

Domestic

Mailing Address (include Suite or Bldg. here, if applicable)

4601 HIGHWAY 377 S

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

City

BROWNWOOD

State

TX

Zip

76801

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

3252060195

Extension

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

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

E-mail

randi.schmidling@kohler.com

## Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

Organization Name

Prefix

First

Middle

Last

Suffix

Credentials

Title

Enter new address or copy one from list:

Mailing Address

Address Type

Mailing Address (include Suite or Bldg. here, if applicable)

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

City

State

ZIP

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

Extension

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

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

E-mail

NATASHA HALAGERI(SOUTHWEST SHIPY... )

SOUTHWEST SHIPYARD LP

MS

NATASHA

HALAGERI

PROJECT MANAGER

Domestic

230 W MONROE ST STE 630

CHICAGO

IL

60606

6013237775

nhalageri@trccompanies.com

## Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

31 Deg 39 Min 50 Sec

3) Permit Longitude Coordinate:

98 Deg 59 Min 49 Sec

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

Update

4.1. Select the permit/project number for which this update should be applied.

2711-37391

5) Who will electronically sign this Title V application?

Responsible Official

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

No

## Title V Attachments Existing

Attach OP-1 (Site Information Summary)

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

Attach OP-ACPS (Application Compliance Plan and Schedule)

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

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

[File Properties]

File Name

[OP-PBRSUP \(2025-04-08\).docx](/ePermitsExternal/faces/file?fileId=250317)

Hash

FD9E52313D260D46287A13C1D7B05AE3A0CCA662C4430168423AAA36647C49DD

MIME-Type

application/vnd.openxmlformats-officedocument.wordprocessingml.document

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

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

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

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

## Certification

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

1. I am Dale Lepp, the owner of the STEERS account ER075091.
2. I have the authority to sign this data on behalf of the applicant named above.
3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
8. I am knowingly and intentionally signing Title V Existing 2711.
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: Dale Lepp OWNER OPERATOR

|                                      |  |
|--------------------------------------|--|
| Account Number:                      | ER075091   |
| Signature IP Address:                | 170.85.99.102  |
| Signature Date:                      | 2025-05-16   |
| Signature Hash:                      | B18C08534F5FA68F31AAA85198278EA695BA3A2D6ECBCA593CEFF6A62D6FCA7A |
| Form Hash Code at time of Signature: | AF108CC3BFAC9284E87D3B9CD7731935020E5955C20D4BF01C9C7FAF21215C4F |

## Submission

|                      |   |
|----------------------|---|
| Reference Number:    | The application reference number is 776948                  |
| Submitted by:        | The application was submitted by ER075091/Dale Lepp         |
| Submitted Timestamp: | The application was submitted on 2025-05-16 at 09:30:39 CDT |
| Submitted From:      | The application was submitted from IP address 170.85.99.102 |
| Confirmation Number: | The confirmation number is 653482                           |
| Steers Version:      | The STEERS version is 6.91                                  |
| Permit Number:       | The permit number is 2711                                   |

## Additional Information

Application Creator: This account was created by Stephanie P Mckay

---

## Ryan Glaze

---

**From:** Ryan Glaze  
**Sent:** Tuesday, April 8, 2025 2:34 PM  
**To:** Ideris, Alan  
**Cc:** Halageri, Natasha; Jason Nall; McKay, Stephanie  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Greetings Alan,

Thank you for the updated OP-PBRSUP. If you could please go ahead and submit this updated document to STEERS to certify the document that would be great.

Thanks,

### ***Ryan Glaze***

Operating Permits Section  
Air Permits Division  
Texas Commission on Environmental Quality  
P.O. Box 13087 MC 163  
Austin, TX, 78711  
(512) 239-6212



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---

**From:** Ideris, Alan <Alderis@trccompanies.com>  
**Sent:** Tuesday, April 8, 2025 1:25 PM  
**To:** Ryan Glaze <James.Glaze@tceq.texas.gov>  
**Cc:** Halageri, Natasha <NHalageri@trccompanies.com>; Jason Nall <Jason.Nall@kohler.com>; McKay, Stephanie <SMcKay@trccompanies.com>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Hello Ryan,

We appreciate your review. Please see the attached updated OP-PBRSUP.

Regards,

Alan "A.J." Ideris

Houston Office Practice Leader – Air Quality Consulting  
Environmental, Health, Safety, and Sustainability Practice



11767 Katy Freeway, Suite 850, Houston, TX 77079  
C 281.389.1907 T 713.244.1007 | [alderis@trccompanies.com](mailto:alderis@trccompanies.com)  
[LinkedIn](#) | [Instagram](#) | [TRCcompanies.com](http://TRCcompanies.com)

---

**From:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Sent:** Tuesday, March 25, 2025 11:21 AM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>; Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Thank you Ryan.

-Jason

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---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Tuesday, March 25, 2025 11:04 AM  
**To:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Cc:** Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>; Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Greetings Jason,

That would be perfectly fine to do so. The new deadline will be documented as Tuesday, April 8<sup>th</sup>. Thank you for keeping me informed.

Thanks,

***Ryan Glaze***

Operating Permits Section  
Air Permits Division  
Texas Commission on Environmental Quality  
P.O. Box 13087 MC 163  
Austin, TX, 78711  
(512) 239-6212



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**From:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Sent:** Tuesday, March 25, 2025 11:01 AM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>; Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

I just received away messages from both AJ and Natasha with my reply to your e-mail. Looks like AJ is coming back from vacation March 31<sup>st</sup>. Can we extend the response to your requested addendums a week later to Tuesday, April 8<sup>th</sup>?

Please let me know if this date is suitable or if you would prefer it sooner.

Thank You,

Jason Nall

**Jason Nall, P.E.\***  
Manager - Global EHS  
Kohler Co.  
Cell: 920.226.8046  
Email: [jason.nall@kohler.com](mailto:jason.nall@kohler.com)  
*Experience gracious living at [www.kohler.com](http://www.kohler.com)*  
\*Professional Engineer in WI

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**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Tuesday, March 25, 2025 10:55 AM  
**To:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

Greetings Jason,

Thank you so much for the help.

Thanks,

***Ryan Glaze***  
Operating Permits Section  
Air Permits Division  
Texas Commission on Environmental Quality  
P.O. Box 13087 MC 163  
Austin, TX, 78711

(512) 239-6212



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**From:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>

**Sent:** Tuesday, March 25, 2025 10:54 AM

**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>; Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>

**Cc:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

I am forwarding your message to AJ Ideris (TRC). AJ will be in receipt and respond to Natasha's e-mails and questions regarding open projects while she is on maternity leave.

Thank You,

Jason Nall

**Jason Nall, P.E.\***

Manager - Global EHS

Kohler Co.

Cell: 920.226.8046

Email: [jason.nall@kohler.com](mailto:jason.nall@kohler.com)

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\*Professional Engineer in WI

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**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Sent:** Tuesday, March 25, 2025 10:26 AM

**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Greetings Natasha,

During the final stages of review, it was noticed that PBR 106.472 is missing from the OP-PBRSUP. If you could please add PBR 106.472 to Tables A & D to that form and send it to me by **Tuesday (April 1<sup>st</sup>)**. Once that is done if you could please submit the updated OP-PBRSUP to STEERS that would be great. If you have any questions about the permit, please let me know.

Thanks,

***Ryan Glaze***

Operating Permits Section  
Air Permits Division  
Texas Commission on Environmental Quality  
P.O. Box 13087 MC 163  
Austin, TX, 78711  
(512) 239-6212



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**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Sent:** Friday, February 7, 2025 11:57 AM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

Yes, that is correct.

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Friday, February 7, 2025 11:03 AM  
**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

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Greetings Natsha,

Just to confirm I noticed on the OP-PRBSUP and OP-REQ1 page 89 that PBRs 106.265, SE11, SE40, and SE86 are no longer listed on the document. Does this mean that those PBRs are not longer active at the site. I just need to know so I can remove them from the permit if that is the case.

Thanks,

Ryan

---

**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Sent:** Friday, February 7, 2025 10:47 AM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

Hello Ryan,

Please see attached the updated forms. Let me know if you need anything else.

Thanks,  
Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Monday, February 3, 2025 2:36 PM  
**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Greetings Natasha,

Just to follow up on the question that I wasn't fully sure on. Yes, Standard Exception must be listed on the PBRSUP. The reason is we must know where each PBRs is being used for each unit attached to that PBR. Just wanted to follow up to give you a more definitive answer after consulting with my mentor about it. If you have any questions, please let me know. I look forward to getting the documents from you on Thursday.

Thanks,

***Ryan Glaze***

Operating Permits Section  
Air Permits Division  
Texas Commission on Environmental Quality  
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(512) 239-6212



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**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Sent:** Monday, February 3, 2025 2:04 PM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Hello Ryan,

Can we talk about these questions? I am a little confused since the PBRs do not match the forms.

Thanks,  
Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Thursday, January 30, 2025 8:38 AM  
**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Good morning Natasha,

I found something that needs to be addressed.

You have a PBR no. 106.264 listed on the OP-PBRSUP however it is not listed on the OP-REQ1 page 87. For 106.264 in needs to be added to the OP-REQ1 to show that it is being used on the permit. please put the PBR no. 106.264 on OP-REQ1 to make sure that it can be added to the permit. As of right now this PBR is not listed on the permit.

Additionally, other PBRs that have been issued are on the permit, however they're not on the OP-PBRSUP. If you could please add those PBRs (106.183, 106.265, 106.472, 3, 7, 11, 40, and 86) to the PBRSUP along with the units associated with those PBRs.

If you could please provide an update to this information to me by **Monday February 3, 2025** that would be great.

Thanks,

***Ryan Glaze***

Operating Permits Section  
Air Permits Division  
Texas Commission on Environmental Quality  
P.O. Box 13087 MC 163  
Austin, TX, 78711  
(512) 239-6212



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**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Sent:** Tuesday, January 28, 2025 1:11 PM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>  
**Subject:** Re: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

No this renewal is not being incorporated since it is still pending issuance

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**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Tuesday, January 28, 2025 1:09:01 PM  
**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Greetings Natasha,

That is great to hear! One final thing, I noticed that there is a pending renewal application for NSR authorization number 6414. I wanted to know if this renewal is being incorporated in this minor revision.

Thanks,

Ryan Glaze

---

**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Sent:** Tuesday, January 28, 2025 1:06 PM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Hello Ryan,

We submitted the updated forms via STEERS. Let me know if you need anything else.

Thanks,  
Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Thursday, January 23, 2025 3:34 PM  
**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Hi Natasha,

Great! Thank you so much for the update. Some final things that I just wanted to make sure of before continuing with your permit. I noticed that there is a pending renewal application for NSR authorization number 6414. I wanted to know if this renewal is being incorporated in this minor revision. Additionally, if you could please submit the OP-UA66 and the final OP-CRO1 forms to STEERS if you have not done so already. If you could please have this done for me my **January 29, 2025** that would be great. If you have any questions for me, please let me know.

Thanks,

***Ryan Glaze***

Operating Permits Section

Air Permits Division

Texas Commission on Environmental Quality

P.O. Box 13087 MC 163

Austin, TX, 78711

(512) 239-6212



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**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Sent:** Thursday, January 23, 2025 9:51 AM

**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

We reviewed the updated draft permit and are good with the conditions.

Thanks,  
Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Sent:** Friday, January 17, 2025 4:49 PM

**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Greetings Natasha,

I have attached your updated Draft permit. If you have any questions going forward, please feel free to reach out to me.

Have a good weekend,

Ryan Glaze

---

**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Sent:** Friday, January 17, 2025 8:48 AM

**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

Please see attached.

Thanks,  
Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Sent:** Thursday, January 16, 2025 3:59 PM

**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Greetings Natasha,



It seems the OP-UA66 form was filled out incorrectly, the compliance option given (5810-C) should have had you go and fill out the CMS question of either yes or no. 95% reduction, affected source type, facility type, large parts, and operation type does not have to be answer.

I have attached the original OP-UA66 that was submitted with the initial application. The way that you have it filled out there is correct.

If you could do the same for units E080-084 and E110-113 that should do it. If you could please have these updates to me by **next Thursday (January 23, 2025)** that would be great. If you have any questions about what I am asking, please let me know.

Thanks,

***Ryan Glaze***

Operating Permits Section

Air Permits Division

Texas Commission on Environmental Quality

P.O. Box 13087 MC 163

Austin, TX, 78711

(512) 239-6212



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**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Sent:** Thursday, January 16, 2025 10:46 AM

**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

Please see attached the updated OP-UA66 form for your review.

Let me know if you need anything else from us.

Thanks,  
Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Sent:** Thursday, January 9, 2025 3:13 PM

**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Greetings,

I am following up based on our call yesterday afternoon. Based on your comments in the call, you plan to readd Unit IDs E110, E111, E112, and E113 to the permit since they are still in operation. Additionally, we discussed updated the high level applicability to MACT WWWW that remains in the permit for Unit IDs E80, E81, E82, E83, and E-84. Please submit an updated form OP-UA66, Table 1 for each of the units listed above (both the E110 series and E80 series units). Once I have received the updates, I will update the draft permit and send you the updated copy. If you could have these updates to me by **January 17, 2025** that would be great.

Please let me know if you have any questions

Thanks,

***Ryan Glaze***

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Air Permits Division

Texas Commission on Environmental Quality

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**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Sent:** Friday, December 20, 2024 3:36 PM

**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

We are open the morning of Monday, Jan. 6, or the afternoons of Jan. 7 and 8. Let me know if these slots work for you.

Thanks,  
Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Sent:** Friday, December 20, 2024 10:23 AM

**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

This is an **External** email. Do not click links or open attachments unless you validate the sender and know the content is safe.

**ALWAYS** hover over the link to preview the actual URL/site and confirm its legitimacy.

Greetings Natasha,

Yes, I'm able to give an extension till January 15, 2025. When it comes to setting up a teams meeting if you can tell me what days during week of January 6 that you are available to meet I should be able to set up a teams meeting for us during that time. Once I get your response, I should have the teams meetings information sent out by Monday of next week. If you have any other questions, please let me know.

Thanks,

Ryan Glaze

---

**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Sent:** Friday, December 20, 2024 9:33 AM

**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

We have reviewed the draft SOP and had a few questions which we would like to discuss with you over a Teams call. Due to the holidays, we are not available for the next 2 weeks and wanted to schedule a call for the week of January 6. Once we resolve our issues over the call, we can provide our responses.

As such, can you please provide us an extension to provide our responses till January 15, 2025?

Thanks,  
Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Sent:** Tuesday, December 17, 2024 9:30 AM

**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Cc:** Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>

**Subject:** [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

This is an **External** email. Do not click links or open attachments unless you validate the sender and know the content is safe.

**ALWAYS** hover over the link to preview the actual URL/site and confirm its legitimacy.

Greetings,

I have conducted a technical review of minor revision application for Kohler Co./Brownwood Plant. 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 on the working draft permit by Due Date **January 3, 2025**.

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,

***Ryan Glaze***

Operating Permits Section

Air Permits Division

Texas Commission on Environmental Quality

P.O. Box 13087 MC 163

Austin, TX, 78711

(512) 239-6212



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

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

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

|  |
|--|
| <b>I. Company Identifying Information</b>  |
| A. Company Name: <b>Kohler Co.</b>   |
| B. Customer Reference Number (CN): <b>CN600127039</b>  |
| C. Submittal Date (mm/dd/yyyy): <b>11/15/2024</b>  |
| <b>II. Site Information</b>  |
| A. Site Name: <b>Brownwood Plant</b>   |
| B. Regulated Entity Reference Number (RN): <b>RN102560372</b>  |
| C. Indicate affected state(s) required to review permit application: <i>(Check the appropriate box[es].)</i>   |
| <input type="checkbox"/> AR <input type="checkbox"/> CO <input type="checkbox"/> KS <input type="checkbox"/> LA <input type="checkbox"/> NM <input type="checkbox"/> OK <input checked="" type="checkbox"/> N/A  |
| D. Indicate all pollutants for which the site is a major source based on the site's potential to emit:<br><i>(Check the appropriate box[es].)</i>  |
| <input checked="" type="checkbox"/> VOC <input type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> CO <input type="checkbox"/> Pb <input checked="" type="checkbox"/> HAPS |
| Other:   |
| E. Is the site a non-major source subject to the Federal Operating Permit Program? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>  |
| F. Is the site within a local program area jurisdiction? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>  |
| G. Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>   |
| H. Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:   |
| <b>III. Permit Type</b>  |
| A. Type of Permit Requested: <i>(Select only one response)</i>   |
| <input checked="" type="checkbox"/> Site Operating Permit (SOP) <input type="checkbox"/> Temporary Operating Permit (TOP) <input type="checkbox"/> General Operating Permit (GOP)  |

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

|  |
|--|
| <b>IV. Initial Application Information</b> <i>(Complete for Initial Issuance Applications Only.)</i>   |
| <b>A.</b> Is this submittal an abbreviated or a full application? <span style="float: right;"><input type="checkbox"/> Abbreviated <input type="checkbox"/> Full</span>  |
| <b>B.</b> If this is a full application, is the submittal a follow-up to an abbreviated application? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>   |
| <b>C.</b> If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>   |
| <b>D.</b> Has an electronic copy of this application been submitted (or is being submitted) to EPA? (Refer to the form instructions for additional information.) <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span> |
| <b>E.</b> Has the required Public Involvement Plan been included with this application? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>  |
| <b>V. Confidential Information</b>   |
| <b>A.</b> Is confidential information submitted in conjunction with this application? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span>   |
| <b>VI. Responsible Official (RO) Identifying Information</b>   |
| RO Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)   |
| RO Full Name: <b>Dale Lepp</b>   |
| RO Title: <b>Plastics Superintendent</b>   |
| Employer Name: <b>Kohler Co.</b>   |
| Mailing Address: <b>4601 Highway 377 South</b>   |
| City: <b>Brownwood</b>   |
| State: <b>Texas</b>  |
| ZIP Code: <b>76801</b>   |
| Territory:   |
| Country: <b>USA</b>  |
| Foreign Postal Code:   |
| Internal Mail Code:  |
| Telephone No.: <b>325-203-2186</b>   |
| Fax No.:   |
| Email: <a href="mailto:Dale.Lepp@Kohler.com">Dale.Lepp@Kohler.com</a>  |

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

|   |
|---|
| <b>VII. Technical Contact Identifying Information</b> <i>(Complete if different from RO.)</i>   |
| Technical Contact Name Prefix: ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input checked="" type="checkbox"/> Ms. <input type="checkbox"/> Dr.)   |
| Technical Contact Full Name: <b>Natasha Halageri</b>  |
| Technical Contact Title: <b>Senior Project Manager</b>  |
| Employer Name: <b>TRC Environmental Corp.</b>   |
| Mailing Address: <b>230 W Monroe Street Suite 630</b>   |
| City: <b>Chicago</b>  |
| State: <b>Illinois</b>  |
| ZIP Code: <b>60606</b>  |
| Territory:  |
| Country: <b>USA</b>   |
| Foreign Postal Code:  |
| Internal Mail Code:   |
| Telephone No.: <b>601-323-7775</b>  |
| Fax No.:  |
| Email: <a href="mailto:NHalageri@trccompanies.com">NHalageri@trccompanies.com</a>   |
| <b>VIII. Reference Only Requirements</b> <i>(For reference only.)</i>   |
| <b>A.</b> State Senator: <b>Phil King, District 10</b>  |
| <b>B.</b> State Representative: <b>David Speller, District 68</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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</span> |
| <b>D.</b> Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>   |
| <b>E.</b> Indicate the alternate language(s) in which public notice is required:  |



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

|  |
|--|
| <b>IX. Off-Site Permit Request</b><br><i>(Optional for applicants requesting to hold the FOP and records at an off-site location.)</i>                 |
| <b>A.</b> Office/Facility Name:  |
| <b>B.</b> Physical Address:  |
| City:  |
| State:   |
| ZIP Code:  |
| Territory:   |
| Country:   |
| Foreign Postal Code:   |
| <b>C.</b> Physical Location:   |
|  |
|  |
| <b>D.</b> Contact Name Prefix: ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.) |
| Contact Full Name:   |
| <b>E.</b> Telephone No.:   |
| <b>X. Application Area Information</b>   |
| <b>A.</b> Area Name: <b>Brownwood Plant</b>  |
| <b>B.</b> Physical Address: <b>4601 Highway 377 South</b>  |
| City: <b>Brownwood</b>   |
| State: <b>Texas</b>  |
| ZIP Code: <b>76801</b>   |
| <b>C.</b> Physical Location:   |
|  |
|  |
|  |
| <b>D.</b> Nearest City:  |
| <b>E.</b> State:   |
| <b>F.</b> ZIP Code:  |

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

|  |
|--|
| <b>X. Application Area Information (continued)</b>   |
| <b>G.</b> Latitude (nearest second): <b>31.664722</b>  |
| <b>H.</b> Longitude (nearest second): <b>-98.9975</b>  |
| <b>I.</b> Are there any emission units that were not in compliance with the applicable requirements identified in the application at the time of application submittal? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span> |
| <b>J.</b> Indicate the estimated number of emission units in the application area: <b>10</b>   |
| <b>K.</b> Are there any emission units in the application area subject to the Acid Rain Program? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>  |
| <b>L.</b> Affected Source Plant Code (or ORIS/Facility Code):  |
| <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: <b>Brownwood Public Library</b>   |
| <b>B.</b> Physical Address: <b>600 Carnegie Street</b>   |
| City: <b>Brownwood</b>   |
| ZIP Code: <b>76801</b>   |
| <b>C.</b> Contact Person (Someone who will answer questions from the public during the public notice period):  |
| Contact Name Prefix: ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input checked="" type="checkbox"/> Ms. <input type="checkbox"/> Dr.):   |
| Contact Person Full Name: <b>Randi Schmidling</b>  |
| Contact Mailing Address: <b>4601 Highway 377 South</b>   |
| City: <b>Brownwood</b>   |
| State: <b>Texas</b>  |
| ZIP Code: <b>76801</b>   |
| Territory:   |
| Country: <b>USA</b>  |
| Foreign Postal Code:   |
| Internal Mail Code:  |
| Telephone No.: <b>325-203-0195</b>   |

**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 TCEQ or the Office of Attorney General on behalf of 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**

|  |
|--|
| <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>XIV. Alternate Designated Representative (ADR) Identifying Information</b>  |
| ADR Name Prefix: ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> 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:   |



14701 St. Mary's Ln., Ste. 500  
Houston, TX 77079

T 281.616.0100  
TRCcompanies.com

November 6, 2024

**Submitted Via STEERS**

Texas Commission on Environmental Quality (TCEQ)  
Air Permits Initial Review Team (APIRT)  
12100 Park 35 Circle, MC161  
Building C, Third Floor  
Austin, TX 78753

RE: Title V Streamlined Minor Revision Application  
The Kohler Co. – Brownwood Plant  
Brownwood, Brown County, Texas  
Permit No. O-2711  
Regulated Entity Number: RN102560372  
Customer Reference Number: CN600127039

Dear Sir or Madam:

TRC Environmental Corporation (TRC), on behalf of The Kohler Co. (Kohler), is hereby submitting the Title V Streamlined Minor Revision application for the Brownwood Plant located in Brown County, Texas. This submittal is to authorize the addition of three chopcoat spray booths, three trimming and grinding booths, three resin storage tanks, and associated equipment cleanup operations. Additionally, Kohler is also requesting the removal of existing acrylic (ACR) chop booths.

The enclosed streamlined minor revision application for Site Operating Permit No. O-2711 meets the requirements for a minor revision application per 30 TAC §122.215. The enclosed application includes the following TCEQ forms: OP-CRO1, OP-ACPS, OP-SUMR, OP-2, OP-REQ1 (Page 89), OP-PBRSUP, OP-UA3, and OP-UA66.

Should you have any questions regarding this application, please contact Mr. Jason Nall of Kohler by email at [jason.nall@kohler.com](mailto:jason.nall@kohler.com) or by phone at (920) 457-4441 Ext. 70195, or me via email at [NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com) or by phone at (601) 323-7775.

Sincerely,

TRC Environmental Corporation

Natasha Halageri  
Senior Project Manager

cc: U.S. Environmental Protection Agency, Air Permits Section (6PD-R), Region 6 (Electronic Submittal:  
[R6AirPermitsTX@epa.gov](mailto:R6AirPermitsTX@epa.gov))  
Air Section Manager, TCEQ Region 3, Abilene (STEERS)



# Title V Streamlined Minor Revision Application

Title V Permit Number O-2711

*The Kohler Co.  
Brownwood Plant  
Brown County, Texas*

November 2024

*TRC Environmental Corporation | The Kohler Co.*

*Final 11/6/2024*

*P:\Kohler\571840.0000\_NSR Amendment\Title V\Final 11-6-2024\_R571840.0000-001.docx*

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## List of Appendices

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# Section 1

## Executive Summary

---

### 1.1 Introduction

Kohler Co. (Kohler) manufactures a variety of quality vitreous china and Fiber Reinforced Plastic (FRP) plumbing fixtures for sale and distribution worldwide at the manufacturing facility in Brownwood, Texas. The Brownwood Plant is located at 4601 Highway 377 South, in Brownwood, Brown County, Texas. The Texas Commission on Environmental Quality (TCEQ) Customer Number (CN) for Kohler is CN600127039 and the TCEQ Regulated Entity Number (RN) for the Brownwood facility is RN102560372. The manufacturing operations at the Brownwood Plant are authorized by TCEQ New Source Review (NSR) air quality permit nos. 6414 and 18136, various standard exemptions and permits-by-rule, and a Site Operating Permit (SOP) O-2711.

### 1.2 Purpose of the Application

The purpose of the enclosed streamlined minor revision application is to authorize the installation and operation of a new Acrylic Fixture Fiberglass Reinforced Plastic (FRP) line at the Brownwood facility. The project will comprise of three chopcoat spray booths, three trimming and grinding booths, three resin storage tanks, and associated equipment cleanup operations. Additionally, Kohler is also requesting the removal of four (4) existing acrylic (ACR) chop booths.

The enclosed streamlined minor revision application for Permit No. O-2711 meets the requirements for a revision per 30 TAC Chapter 122. The enclosed application includes the following TCEQ forms: OP-CRO1, OP-ACPS, OP-SUMR, OP-2, OP-REQ1 (Pages 87 and 88), OP-PBRSUP, OP-UA3, and OP-UA66.



## Section 2

# Process Description

---

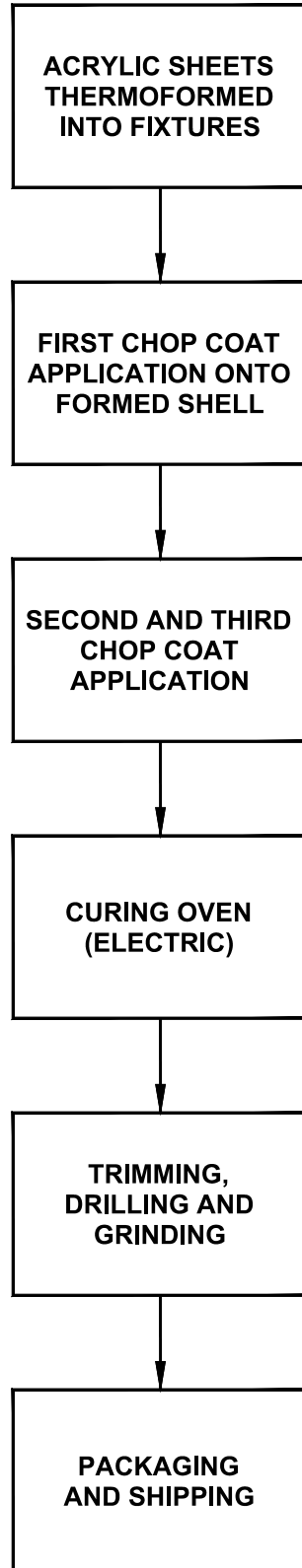
Kohler manufactures acrylic and gelcoat FRP bathroom fixtures (*e.g.*, tubs and shower receptors). Bulk quantities of resin and vinyl toluene additive delivered to the site in tank trucks are transferred to the vertical fixed roof storage tanks. An acrylic sheet is thermoformed into a fixture shape mold. Fiberglass and resin "chopcoat" are applied to the shell to provide reinforcement. For the spray-up operation, enough resin is transferred to the non-atomized spray gun pot. The resin and catalyst are mixed in the gun and the resulting mixture is applied to the molds. Fluid Impingement Technology (FIT) spray equipment is used to spray the chopcoat without atomization. As the material is applied to the mold, it is rolled out to compact the applied material to remove voids and ensure that each layer will tightly adhere to the previous layer. Once spraying is complete, the part is allowed to cure.


The cured parts move into one of three drill, trim and grind booths equipped with a particulate filter with 99 percent efficiency. Various cutting devices are used to remove casting flash, drill holes, and flatten various surfaces.

The resin application equipment and application tools are periodically cleaned since the resin will harden and render the equipment inoperable. Equipment cleaning operations are conducted with the booths or room ventilation systems operating such that cleaning emissions are captured as well.

A confidential process flow diagram is included as Figure 2-1A. A non-confidential process flow diagram is included as Figure 2-1B.

LAST EDIT: 08/02/2024 - FILE LOCATION: HOU C:\OF-TRC\DRAWING-CDrive\PP\Files\Kohler Co\Brownwood Plant\571840\ KOHLER-Brownwood Plant- Process Flow Diagrams.dwg



| CLIENT / PROJECT   |                          |             |
|--|--------------------------|-------------|
| KOHLER, CO.<br>Brownwood Plant<br>4601 Highway 377 South, Brownwood, TX 76801  |                          |             |
| TITLE  |                          |             |
| PROCESS FLOW DIAGRAM   |                          |             |
| DRAWN BY: O. Fonseca   | REQUEST BY: N. Halageri  | PROJECT NO. |
| DWG. DATE: August 2024   | PROJECT-MGR: N. Halageri | 571840      |
|    |                          | FIGURE      |
|  |                          | 2-1B        |
| 14701 ST. MARY'S LANE, STE. 500<br>HOUSTON, TEXAS 77079<br>PHONE: 281-616-0100<br><a href="http://TRCcompanies.com">TRCcompanies.com</a> |                          |             |

## Section 3

# Site Location

---

The Brownwood Plant is located at 4601 Highway 377 South in Brownwood, Brown County, Texas.

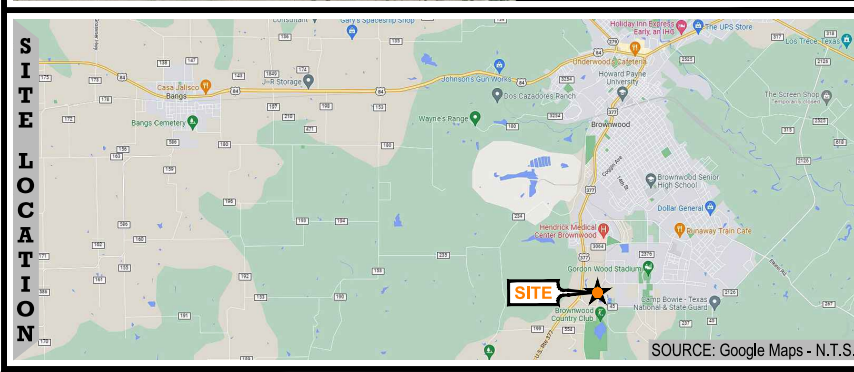
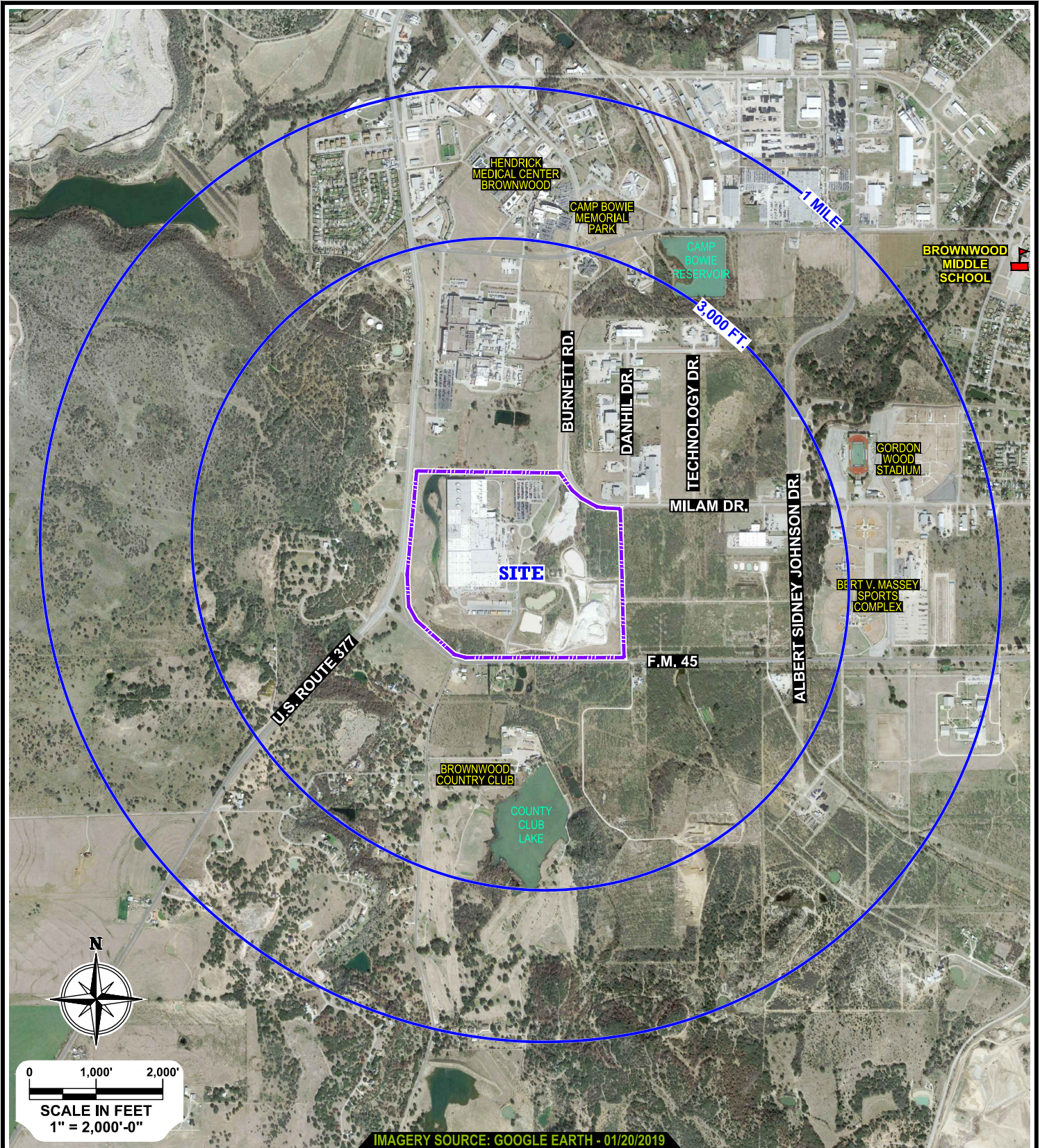
Latitude / Longitude: 31.664722/ -98.9975


An area map is included as Figure 3-1. The area map includes a true north arrow, an accurate scale, the entire plant property, the location of the property relative to prominent geographical features, industrial and non-industrial classification, and the location of the nearest schools relative to the Brownwood Plant. Figure 3-1 includes a circle of 3,000-ft radius and a circle of one-mile radius from the property boundary. The area map includes current aerial photography to depict the land use surrounding the facility.

The plot plan (**Confidential**), Figure 3-2A, is included in the confidential section of this application. Figure 3-2B illustrates the site orientation, the plant boundary, and all emission points at the Brownwood Plant.



LAST EDIT: 07/19/2022 - FILE LOCATION: HOU C:\OF-TRC\DRAWING-CDrive\PL-Files\Kohler Co\Brownwood Plant\ Fig 1-1 -KOHLER-BrownwoodPlant - Area Map.dwg



| CLIENT / PROJECT   |                             |  |
|--|-----------------------------|--|
| KOHLER CO.<br>Brownwood Plant<br>4601 Highway 377 South, Brownwood, TX 76801         |                             |  |
| TITLE  |                             |  |
| AREA MAP   |                             |  |
| DRAWN BY: O. Fonseca   | REQUEST BY: N. Halageri     | PROJECT NO. 483853.0000  |
| DWG. DATE: July 2022   | PROJECT-MGR: A. Rathinasamy | FIGURE 3-1   |
|  |                             | 14701 ST. MARY'S LANE, STE. 500<br>HOUSTON, TEXAS 77079<br>PHONE: 281-616-0100<br><a href="http://TRCcompanies.com">TRCcompanies.com</a> |





IMAGERY SOURCE: GOOGLE EARTH - 01/20/2019

## LEGEND



DOWNWASH STRUCTURE (BUILDING)



0 100' 200'  
SCALE IN FEET  
1" = 200'-0"

## CLIENT / PROJECT

**KOHLER CO.**  
**Brownwood Plant**  
**4601 Highway 377 South, Brownwood, TX 76801**

## TITLE

**PLOT PLAN**

DRAWN BY: O. Fonseca

REQUEST BY: N. Halageri

PROJECT NO.

DWG. DATE: November 2022

PROJECT-MGR: A. Ideris

**483853.0000**



14701 ST. MARY'S LANE, STE. 500  
HOUSTON, TEXAS 77079  
PHONE: 281-616-0100  
[TRCcompanies.com](http://TRCcompanies.com)

FIGURE

**3-2B**

# Appendix A

## Title V Application Forms

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- Form OP-CRO1
- Form OP-SUMR
- Form OP-2
- Form OP-ACPS
- Form OP-REQ1 (Page 89)
- Form OP-PBRSUP
- Form OP-UA3
- Form OP-UA66

**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: <b>RN102560372</b>  |
| CN: <b>CN600127039</b>  |
| Account No.:  |
| Permit No.: <b>O2711</b>  |
| Project No.: <b>TBA</b>   |
| Area Name: <b>Brownwood Plant</b>   |
| Company Name: <b>The Kohler Co.</b>   |
| <b>II. Certification Type</b> <i>(Please mark appropriate box)</i>  |
| <input checked="" type="checkbox"/> <b>Responsible Official Representative</b> <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 checked="" type="checkbox"/> <b>Permit Revision, Renewal, or Reopening</b> |
| <input type="checkbox"/> GOP Initial Permit Application <input 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><b>Dale Lepp</b></u> certify that I am the <u><b>RO</b></u><br><div style="display: flex; justify-content: space-between; margin-top: 5px;"><span><i>(Certifier Name printed or typed)</i></span><span><i>(RO or DAR)</i></span></div>  |
| and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:<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 _____ to _____<br><div style="display: flex; justify-content: space-between; margin-top: 5px;"><span><i>(Start Date)</i></span><span><i>(End Date)</i></span></div>   |
| Specific Dates: <u><b>11/06/2024</b></u> _____<br><div style="display: flex; justify-content: space-between; margin-top: 5px;"><span><i>(Date 1)</i></span><span><i>(Date 2)</i></span><span><i>(Date 3)</i></span><span><i>(Date 4)</i></span></div>   |
| _____<br><div style="display: flex; justify-content: space-between; margin-top: 5px;"><span><i>(Date 5)</i></span><span><i>(Date 6)</i></span></div>  |
| Signature: _____ Signature Date: _____ Title: _____<br>_____  |
| Title: _____  |



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

**Table 1**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 11/06/2024 | O2711      | RN102560372          |

| Unit/Process<br>AI | Unit/Process<br>Revision No. | Unit/Process ID No. | Unit/Process<br>Applicable<br>Form | Unit/Process Name/ Description | Unit/Process<br>CAM | Preconstruction<br>Authorizations<br>30 TAC Chapter<br>116/ 30 TAC<br>Chapter 106 | Preconstruction<br>Authorizations Title I |
|--------------------|------------------------------|---------------------|------------------------------------|--------------------------------|---------------------|---|---|
| A                  | 1                            | BOOTH1a             | OP-UA66                            | Spray Coat Booth 1 Stack 1     |                     | 6414  |   |
| A                  | 2                            | BOOTH1b             | OP-UA66                            | Spray Coat Booth 1 Stack 2     |                     | 6414  |   |
| A                  | 3                            | BOOTH2a             | OP-UA66                            | Spray Coat Booth 2 Stack 1     |                     | 6414  |   |
| A                  | 4                            | BOOTH2b             | OP-UA66                            | Spray Coat Booth 2 Stack 2     |                     | 6414  |   |
| A                  | 5                            | ST1                 | OP-UA3                             | Resin Storage Tank 1           |                     | 6414  |   |
| A                  | 6                            | ST2                 | OP-UA3                             | Resin Storage Tank 2           |                     | 6414  |   |
| A                  | 7                            | ST3                 | OP-UA3                             | Resin Storage Tank 3           |                     | 6414  |   |
| A                  | 8                            | CLEANUP             | OP-SUMR                            | Cleanup Operations             |                     | 6414  |   |
| A                  | 9                            | FUG                 | OP-SUMR                            | Fugitives                      |                     | 6414  |   |
| D                  | 10                           | E110                | OP-SUMR                            | ACR Chop 4 Booth               |                     | 6414  |   |

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

**Table 1**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 11/06/2024 | O2711      | RN102560372          |

| Unit/Process<br>AI | Unit/Process<br>Revision No. | Unit/Process ID No. | Unit/Process<br>Applicable<br>Form | Unit/Process Name/ Description | Unit/Process<br>CAM | Preconstruction<br>Authorizations<br>30 TAC Chapter<br>116/ 30 TAC<br>Chapter 106 | Preconstruction<br>Authorizations Title I |
|--------------------|------------------------------|---------------------|------------------------------------|--------------------------------|---------------------|---|---|
| D                  | 11                           | E111                | OP-SUMR                            | ACR Chop 3 Booth               |                     | 6414  |   |
| D                  | 12                           | E112                | OP-SUMR                            | ACR Chop 1 Booth               |                     | 6414  |   |
| D                  | 13                           | E113                | OP-SUMR                            | ACR Chop 2 Booth               |                     | 6414  |   |
|                    |                              |                     |                                    |                                |                     |   |   |
|                    |                              |                     |                                    |                                |                     |   |   |
|                    |                              |                     |                                    |                                |                     |   |   |
|                    |                              |                     |                                    |                                |                     |   |   |
|                    |                              |                     |                                    |                                |                     |   |   |
|                    |                              |                     |                                    |                                |                     |   |   |

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

|  |   |
|--|---|
| Date: <b>11/06/2024</b>  |   |
| Permit No.: <b>O2711</b>   |   |
| Regulated Entity No.: <b>RN102560372</b>   |   |
| Company Name: <b>The Kohler Co.</b>  |   |
| For Submissions to EPA   |   |
| Has an electronic copy of this application been submitted (or is being submitted) to EPA? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span> |   |
| <b>I. Application Type</b>   |   |
| Indicate the type of application:  |   |
| <input type="checkbox"/> Renewal   |   |
| <input checked="" type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)   |   |
| <input type="checkbox"/> Significant Revision  |   |
| <input type="checkbox"/> Revision Requesting Prior Approval  |   |
| <input type="checkbox"/> Administrative Revision   |   |
| <input type="checkbox"/> Response to Reopening   |   |
| <b>II. Qualification Statement</b>   |   |
| For SOP Revisions Only   | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| For GOP Revisions Only   | <input type="checkbox"/> YES <input type="checkbox"/> NO            |

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

**III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)**

Indicate all pollutants for which the site is a major source based on the site's potential to emit:

*(Check the appropriate box[es].)*

☒ VOC      ☐ NO<sub>x</sub>      ☐ SO<sub>2</sub>      ☐ PM<sub>10</sub>      ☐ CO      ☐ Pb      ☒ HAP

Other:

**IV. Reference Only Requirements (For reference only)**

Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)?      ☒ YES    ☐ NO    ☐ N/A

**V. Delinquent Fees and Penalties**

Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.

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

|                                   |
|-----------------------------------|
| Date: 11/06/2024                  |
| Permit No.: O2711                 |
| Regulated Entity No.: RN102560372 |
| Company Name: The Kohler Co.      |

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

| Revision No. | Revision Code |          | Unit/Group | Process         | NSR<br>Authorization | Description of Change and Provisional<br>Terms and Conditions                   |
|--------------|---------------|----------|------------|-----------------|----------------------|---|
|              |               | New Unit | ID No.     | Applicable Form |                      |   |
| 1            | MS-A          | YES      | BOOTH1a    | OP-UA66         | 6414                 | Addition of spray coat booth 1 stack 1 subject to the requirements of MACT WWW. |
| 2            | MS-A          | YES      | BOOTH1b    | OP-UA66         | 6414                 | Addition of spray coat booth 1 stack 2 subject to the requirements of MACT WWW. |
| 3            | MS-A          | YES      | BOOTH2a    | OP-UA66         | 6414                 | Addition of spray coat booth 2 stack 1 subject to the requirements of MACT WWW. |
| 4            | MS-A          | YES      | BOOTH2b    | OP-UA66         | 6414                 | Addition of spray coat booth 2 stack 2 subject to the requirements of MACT WWW. |
| 5            | MS-A          | YES      | ST1        | OP-UA3          | 6414                 | Addition of resin storage tank.   |
| 6            | MS-A          | YES      | ST2        | OP-UA3          | 6414                 | Addition of resin storage tank.   |
| 7            | MS-A          | YES      | ST3        | OP-UA3          | 6414                 | Addition of resin storage tank.   |
| 8            | MS-A          | YES      | CLEANUP    | OP-SUMR         | 6414                 | Addition of cleanup operations.   |

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

|                                   |
|-----------------------------------|
| Date: 11/06/2024                  |
| Permit No.: O2711                 |
| Regulated Entity No.: RN102560372 |
| Company Name: The Kohler Co.      |

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

| Revision No. | Revision Code |          | Unit/Group | Process         | NSR<br>Authorization | Description of Change and Provisional<br>Terms and Conditions  |
|--------------|---------------|----------|------------|-----------------|----------------------|--|
|              |               | New Unit | ID No.     | Applicable Form |                      |  |
| 9            | MS-A          | YES      | FUG        | OP-SUMR         | 6414                 | Addition of fugitive emissions from finishing, touching up and cleaning of fixtures before they are shipped. |
| 10           | MS-A          | NO       | E110       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 4.  |
| 11           | MS-A          | NO       | E111       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 3.  |
| 12           | MS-A          | NO       | E112       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 1.  |
| 13           | MS-A          | NO       | E113       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 2.  |
|              |               |          |            |                 |                      |  |
|              |               |          |            |                 |                      |  |
|              |               |          |            |                 |                      |  |
|              |               |          |            |                 |                      |  |

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

|                                     |  |                                   |
|-------------------------------------|--|-----------------------------------|
| <b>Date:</b> 11/06/2024             | <b>Regulated Entity No.:</b> RN102560372 | <b>Permit No.:</b> O2711          |
| <b>Company Name:</b> The Kohler Co. |  | <b>Area Name:</b> Brownwood Plant |

- 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*</b><br>(Indicate response by entering an "X" in the appropriate column)   |   |
| <b>1.</b> With the exception of those emission units listed in the Compliance Schedule section of this form (Part 2, below), and based, at minimum, on the compliance method specified in the associated applicable requirements, are all emission units addressed in this application in compliance with all their respective applicable requirements as identified in this application?   | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| <b>2.</b> Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?   | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| <b>3.</b> If the response to Item B.2, above, is "Yes," indicate the total number of Part 2 attachments included in this submittal. <i>(For reference only)</i>   |   |
| <p><small>* For Site Operating Permits (SOPs), the complete application should be consulted for applicable requirements and their corresponding emission units when assessing compliance status.<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.</small></p> <p><small>Compliance should be assessed based, at a minimum, on the required monitoring, testing, record keeping, and/or reporting requirements, as appropriate, associated with the applicable requirement in question.</small></p> |   |

**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. |
|------------|------------|----------------------|
| 11/06/2024 | O2711      | RN102560372          |

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 |
|-------------------|---------------|-------------------|---------------|-------------------|---------------|
| 6414              | 09/20/2024    |                   |               |                   |               |
|                   |               |                   |               |                   |               |
|                   |               |                   |               |                   |               |
|                   |               |                   |               |                   |               |

◆ **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 |
|---------|------------------|---------|------------------|---------|------------------|
| 106.262 | 11/01/2003       | SE 86   | 05/12/1981       |         |                  |
| 106.183 | 09/04/2000       |         |                  |         |                  |
| 106.265 | 09/04/2000       |         |                  |         |                  |
| 106.472 | 09/04/2000       |         |                  |         |                  |
| SE 3    | 09/12/1989       |         |                  |         |                  |
| SE 7    | 09/12/1989       |         |                  |         |                  |
| SE 11   | 05/04/1994       |         |                  |         |                  |
| SE 40   | 05/05/1976       |         |                  |         |                  |

◆ **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 |
|------------|---------------|------------|---------------|------------|---------------|
|            |               |            |               |            |               |
|            |               |            |               |            |               |
|            |               |            |               |            |               |
|            |               |            |               |            |               |



**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 |
|------------|---------------|-------------------------|
| 11/06/2024 | O2711         | RN102560372             |

| Unit ID No. | Registration No. | PBR No. | Registration Date |
|-------------|------------------|---------|-------------------|
| BOOTH1a     | 177386           | 106.262 | 09/13/2024        |
| BOOTH1b     | 177386           | 106.262 | 09/13/2024        |
| BOOTH2a     | 177386           | 106.262 | 09/13/2024        |
| BOOTH2b     | 177386           | 106.262 | 09/13/2024        |
| ST1         | 177386           | 106.262 | 09/13/2024        |
| ST2         | 177386           | 106.262 | 09/13/2024        |
| ST3         | 177386           | 106.262 | 09/13/2024        |
| E272        | 122015           | 106.262 | 08/14/2014        |
| E123        | 103917           | 106.264 | 01/09/2001        |
| E109        | 103928           | 106.264 | 01/02/2001        |
| E103        | 103931           | 106.264 | 02/19/1999        |

**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 |
|------------|---------------|-------------------------|
| 11/06/2024 | O2711         | RN102560372             |

| Unit ID No. | PBR No. | Version No./Date |
|-------------|---------|------------------|
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |

**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 |
|------------|---------------|-------------------------|
| 11/06/2024 | O2711         | RN102560372             |

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

**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 |
|------------|---------------|-------------------------|
| 11/06/2024 | O2711         | RN102560372             |

| Unit ID No. | PBR No. | Version No./Date Or Registration No. | Monitoring Requirement  |
|-------------|---------|--------------------------------------|---|
| BOOTH1a     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| BOOTH1b     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| BOOTH2a     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| BOOTH2b     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| ST1         | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| ST2         | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| ST3         | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| E272        | 106.262 | 122015                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| E123        | 106.264 | 103917                               | Maintain records of the emissions, production rate, throughput and/or capacity from the replacement facility. |

**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 |
|------------|---------------|-------------------------|
| 11/06/2024 | O2711         | RN102560372             |

| Unit ID No. | PBR No. | Version No./Date Or Registration No. | Monitoring Requirement  |
|-------------|---------|--------------------------------------|---|
| E109        | 106.264 | 103928                               | Maintain records of the emissions, production rate, throughput and/or capacity from the replacement facility. |
| E103        | 106.264 | 103931                               | Maintain records of the emissions, production rate, throughput and/or capacity from the replacement facility. |
|             |         |                                      |   |
|             |         |                                      |   |
|             |         |                                      |   |
|             |         |                                      |   |
|             |         |                                      |   |
|             |         |                                      |   |
|             |         |                                      |   |

**Storage Tank/Vessel Attributes**  
**Form OP-UA3 (Page 3)**  
**Federal Operating Permit Program**  
**Table 3: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**  
**Subpart Kb: Standards of Performance for Volatile Organic Liquid Storage Vessels**  
**(Including Petroleum Liquid Storage Vessels)**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 11/06/2024 | O2711      | RN102560372          |

| Unit ID No. | SOP/GOP Index No. | Product Stored | Storage Capacity | WW Tank Control | Maximum TVP | Storage Vessel Description | AMEL ID No. | Guidepole | Reid Vapor Pressure | Control Device ID No. |
|-------------|-------------------|----------------|------------------|-----------------|-------------|----------------------------|-------------|-----------|---------------------|-----------------------|
| ST1         | 60Kb-1            | VOL            | 10K-             |                 |             |                            |             |           |                     |                       |
| ST2         | 60Kb-1            | VOL            | 10K-             |                 |             |                            |             |           |                     |                       |
| ST3         | 60Kb-1            | VOL            | 10K-             |                 |             |                            |             |           |                     |                       |
|             |                   |                |                  |                 |             |                            |             |           |                     |                       |
|             |                   |                |                  |                 |             |                            |             |           |                     |                       |
|             |                   |                |                  |                 |             |                            |             |           |                     |                       |
|             |                   |                |                  |                 |             |                            |             |           |                     |                       |
|             |                   |                |                  |                 |             |                            |             |           |                     |                       |
|             |                   |                |                  |                 |             |                            |             |           |                     |                       |
|             |                   |                |                  |                 |             |                            |             |           |                     |                       |

**Reinforced Plastic Composites Production****Form OP-UA66 (Page 1)****Federal Operating Permit Program****Table 1a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)****Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production****Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 11/06/2024 | O2711      | RN102560372          |

| Process ID No. | SOP Index No. | Production Process Type | Compliance Option | 95% Reduction | Affected Source Type | Facility Type | Large Parts | Operation Type | CMS | Add-On Control Device |
|----------------|---------------|-------------------------|-------------------|---------------|----------------------|---------------|-------------|----------------|-----|-----------------------|
| BOOTH1a        | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
| BOOTH1b        | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
| BOOTH2a        | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
| BOOTH2b        | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |

## Texas Commission on Environmental Quality

Title V Existing

2711

### Site Information (Regulated Entity)

|   |   |
|---|---|
| What is the name of the permit area to be authorized? | KOHLER PLASTICS PLANT                   |
| Does the site have a physical address?                | Yes                                     |
| Physical Address                                      |   |
| Number and Street                                     | 4601 HIGHWAY 377 S                      |
| City  | BROWNWOOD                               |
| State   | TX                                      |
| ZIP   | 76801                                   |
| County  | BROWN                                   |
| Latitude (N) (##.#####)                               | 31.663888                               |
| Longitude (W) (-###.#####)                            | 98.996944                               |
| Primary SIC Code                                      | 3261                                    |
| Secondary SIC Code                                    |   |
| Primary NAICS Code                                    | 327110                                  |
| Secondary NAICS Code                                  |   |
| Regulated Entity Site Information                     |   |
| What is the Regulated Entity's Number (RN)?           | RN102560372                             |
| What is the name of the Regulated Entity (RE)?        | KOHLER BROWNWOOD VITREOUS PLANT         |
| Does the RE site have a physical address?             | Yes                                     |
| Physical Address                                      |   |
| Number and Street                                     | 4601 HIGHWAY 377 S                      |
| City  | BROWNWOOD                               |
| State   | TX                                      |
| ZIP   | 76801                                   |
| County  | BROWN                                   |
| Latitude (N) (##.#####)                               | 31.664722                               |
| Longitude (W) (-###.#####)                            | -98.9975                                |
| Facility NAICS Code                                   |   |
| What is the primary business of this entity?          | INDUSTRIAL CHEMICAL MANUFACTURING PLANT |



## Customer (Applicant) Information

|  |                |
|--|----------------|
| How is this applicant associated with this site? | Owner Operator |
| What is the applicant's Customer Number (CN)?    | CN600127039    |
| Type of Customer                                 | Corporation    |
| Full legal name of the applicant:                |                |
| Legal Name                                       | Kohler Co.     |
| Texas SOS Filing Number                          | 673606         |
| Federal Tax ID                                   | 390402810      |
| State Franchise Tax ID                           | 13904028100    |
| State Sales Tax ID                               |                |
| Local Tax ID                                     |                |
| DUNS Number                                      | 6073225        |
| Number of Employees                              | 501+           |
| Independently Owned and Operated?                | Yes            |

## Responsible Official Contact

|  |                         |
|--|-------------------------|
| Person TCEQ should contact for questions about this application: |                         |
| Organization Name  | KOHLER CO               |
| Prefix   | MR                      |
| First  | DALE                    |
| Middle   |                         |
| Last   | LEPP                    |
| Suffix   |                         |
| Credentials  |                         |
| Title  | PLASTICS SUPERINTENDENT |
| Enter new address or copy one from list:                         |                         |
| Mailing Address  |                         |
| Address Type   | Domestic                |
| Mailing Address (include Suite or Bldg. here, if applicable)     | 4601 HIGHWAY 377 S      |
| Routing (such as Mail Code, Dept., or Attn:)                     |                         |
| City   | BROWNWOOD               |
| State  | TX                      |
| ZIP  | 76801                   |

|                                |                      |
|--------------------------------|----------------------|
| Phone (###-###-####)           | 3252032186           |
| Extension                      |                      |
| Alternate Phone (###-###-####) |                      |
| Fax (###-###-####)             | 3256415834           |
| E-mail                         | Dale.Lepp@Kohler.com |

## Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

Organization Name

Prefix

First

Middle

Last

Suffix

Credentials

Title

Enter new address or copy one from list:

Mailing Address

Address Type

Mailing Address (include Suite or Bldg. here, if applicable)

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

City

State

ZIP

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

Extension

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

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

E-mail

New Contact

TRC Environmental Corp

MS

Natasha

Halageri

SENIOR PROJECT MANAGER

Domestic

14701 SAINT MARYS LN

Suite 500

HOUSTON

TX

77079

6013237775

nhalageri@trccompanies.com

## Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

31 Deg 39 Min 50 Sec

|   |                      |
|---|----------------------|
| 3) Permit Longitude Coordinate:   | 98 Deg 59 Min 49 Sec |
| 4) Is this submittal a new application or an update to an existing application?   | New Application      |
| 4.1. What type of permitting action are you applying for?   | Streamlined Revision |
| 4.1.1. Are there any permits that should be voided upon issuance of this permit application through permit conversion?    | No                   |
| 4.1.2. Are there any permits that should be voided upon issuance of this permit application through permit consolidation? | No                   |
| 5) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?                        | N/A                  |

## Title V Attachments Existing

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

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

[File Properties]

|           |  |
|-----------|--|
| File Name | <a href=/ePermitsExternal/faces/file?fileId=225040>OP-2.pdf</a>  |
| Hash      | AFC0216800EAFE87309D4F5C1A8D315A00394C85087C6057B8048F327CFDDDC2 |
| 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=225041>OP-REQ1 (Page 89).pdf</a> |
| Hash      | 2EC14D242EB53105A07DBE3595F8DB00D924BCBEFB9D3414499DA18640D76DFC             |
| MIME-Type | application/pdf  |

#### Attach OP-REQ2 (Negative Applicable Requirement Determinations)

#### Attach OP-REQ3 (Applicable Requirements Summary)

#### Attach OP-PBRSUP (Permits by Rule Supplemental Table)

[File Properties]

|           |  |
|-----------|--|
| File Name | <a href=/ePermitsExternal/faces/file?fileId=225042>OP-PBRSUP.pdf</a> |
| Hash      | ECA27C0A2D5C52B8A989A84F9AB8340BCA38ACADC3EB7312CE9FD9C34E232DE7     |

|   |   |
|---|---|
| MIME-Type   | application/pdf   |
| Attach OP-SUMR (Individual Unit Summary for Revisions)                |   |
| [File Properties]   |   |
| File Name   | <a href=/ePermitsExternal/faces/file?fileId=225043>OP-SUMR.pdf</a>  |
| Hash  | DAA5225976AA4AB3EE60CD1FF079258502C82F70CD181C72B21B887C6FC79C28  |
| MIME-Type   | application/pdf   |
| Attach OP-MON (Monitoring Requirements)                               |   |
| Attach OP-UA (Unit Attribute) Forms                                   |   |
| [File Properties]   |   |
| File Name   | <a href=/ePermitsExternal/faces/file?fileId=225045>OP-UA3.pdf</a>   |
| Hash  | 1706F0CF3C3E3BC5A86614A6E19053FFAC6250FCC548D0446DB163CDE3379EDC  |
| MIME-Type   | application/pdf   |
| [File Properties]   |   |
| File Name   | <a href=/ePermitsExternal/faces/file?fileId=225044>OP-UA66.pdf</a>  |
| Hash  | 1AF288C53444BE9560285B87FA6E0074108E4C2624F120615B030FF5E20B2B87  |
| MIME-Type   | application/pdf   |
| If applicable, attach OP-AR1 (Acid Rain Permit Application)           |   |
| Attach OP-CRO2 (Change of Responsible Official Information)           |   |
| Attach OP-DEL (Delegation of Responsible Official)                    |   |
| Attach any other necessary information needed to complete the permit. |   |
| [File Properties]   |   |
| File Name   | <a href=/ePermitsExternal/faces/file?fileId=225047>Final 11-6-2024_Confidential_R571840.0000-001.pdf</a>    |
| Hash  | CB29FD01CF238B19E45ECEF4C30891793D9BED3050A212C826E4A67F8645466B  |
| MIME-Type   | application/pdf   |
| [File Properties]   |   |
| File Name   | <a href=/ePermitsExternal/faces/file?fileId=225046>Final 11-6-2024_NonConfidential_R571840.0000-001.pdf</a> |

|           |  |
|-----------|--|
| Hash      | 32AC34FB23094103F72CDBEFD9074633B2F665C83D6066B647B185D1CC8655F6 |
| 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 Dale Lepp, the owner of the STEERS account ER075091.
2. I have the authority to sign this data on behalf of the applicant named above.
3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
8. I am knowingly and intentionally signing Title V Existing 2711.
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: Dale Lepp OWNER OPERATOR

|                                      |  |
|--------------------------------------|--|
| Account Number:                      | ER075091   |
| Signature IP Address:                | 170.85.99.114  |
| Signature Date:                      | 2024-11-12   |
| Signature Hash:                      | 5409410418DB187A02E282CBE5333CE7D5E8FCF85BA41DDD666D8BA1E8ACB582 |
| Form Hash Code at time of Signature: | 6BF9B443D2620C241372BF4F624A5A6793518555BBAD9F79512C5C23E4023FAF |

## Submission

Reference Number:

The application reference number is 702178

Submitted by:

The application was submitted by ER075091/Dale Lepp

Submitted Timestamp:

The application was submitted on 2024-11-12 at 12:29:39 CST

Submitted From:

The application was submitted from IP address 170.85.99.114

Confirmation Number:

The confirmation number is 579542

Steers Version:

The STEERS version is 6.82

Permit Number:

The permit number is 2711

## Additional Information

---

Application Creator: This account was created by Natasha Halageri

---

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

|  |   |
|--|---|
| Date: <b>11/06/2024</b>  |   |
| Permit No.: <b>O2711</b>   |   |
| Regulated Entity No.: <b>RN102560372</b>   |   |
| Company Name: <b>The Kohler Co.</b>  |   |
| For Submissions to EPA   |   |
| Has an electronic copy of this application been submitted (or is being submitted) to EPA? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span> |   |
| <b>I. Application Type</b>   |   |
| Indicate the type of application:  |   |
| <input type="checkbox"/> Renewal   |   |
| <input checked="" type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)   |   |
| <input type="checkbox"/> Significant Revision  |   |
| <input type="checkbox"/> Revision Requesting Prior Approval  |   |
| <input type="checkbox"/> Administrative Revision   |   |
| <input type="checkbox"/> Response to Reopening   |   |
| <b>II. Qualification Statement</b>   |   |
| For SOP Revisions Only   | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| For GOP Revisions Only   | <input type="checkbox"/> YES <input type="checkbox"/> NO            |

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

**III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)**

Indicate all pollutants for which the site is a major source based on the site's potential to emit:  
(Check the appropriate box[es].)

☒ VOC      ☐ NO<sub>x</sub>      ☐ SO<sub>2</sub>      ☐ PM<sub>10</sub>      ☐ CO      ☐ Pb      ☒ HAP

Other:

**IV. Reference Only Requirements (For reference only)**

Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)?      ☒ YES    ☐ NO    ☐ N/A

**V. Delinquent Fees and Penalties**

Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.



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

|                                   |
|-----------------------------------|
| Date: 11/06/2024                  |
| Permit No.: O2711                 |
| Regulated Entity No.: RN102560372 |
| Company Name: The Kohler Co.      |

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

| Revision No. | Revision Code |          | Unit/Group | Process         | NSR<br>Authorization | Description of Change and Provisional<br>Terms and Conditions                   |
|--------------|---------------|----------|------------|-----------------|----------------------|---|
|              |               | New Unit | ID No.     | Applicable Form |                      |   |
| 1            | MS-A          | YES      | BOOTH1a    | OP-UA66         | 6414                 | Addition of spray coat booth 1 stack 1 subject to the requirements of MACT WWW. |
| 2            | MS-A          | YES      | BOOTH1b    | OP-UA66         | 6414                 | Addition of spray coat booth 1 stack 2 subject to the requirements of MACT WWW. |
| 3            | MS-A          | YES      | BOOTH2a    | OP-UA66         | 6414                 | Addition of spray coat booth 2 stack 1 subject to the requirements of MACT WWW. |
| 4            | MS-A          | YES      | BOOTH2b    | OP-UA66         | 6414                 | Addition of spray coat booth 2 stack 2 subject to the requirements of MACT WWW. |
| 5            | MS-A          | YES      | ST1        | OP-UA3          | 6414                 | Addition of resin storage tank.   |
| 6            | MS-A          | YES      | ST2        | OP-UA3          | 6414                 | Addition of resin storage tank.   |
| 7            | MS-A          | YES      | ST3        | OP-UA3          | 6414                 | Addition of resin storage tank.   |
| 8            | MS-A          | YES      | CLEANUP    | OP-SUMR         | 6414                 | Addition of cleanup operations.   |

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

|                                   |
|-----------------------------------|
| Date: 11/06/2024                  |
| Permit No.: O2711                 |
| Regulated Entity No.: RN102560372 |
| Company Name: The Kohler Co.      |

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

| Revision No. | Revision Code |          | Unit/Group | Process         | NSR<br>Authorization | Description of Change and Provisional<br>Terms and Conditions  |
|--------------|---------------|----------|------------|-----------------|----------------------|--|
|              |               | New Unit | ID No.     | Applicable Form |                      |  |
| 9            | MS-A          | YES      | FUG        | OP-SUMR         | 6414                 | Addition of fugitive emissions from finishing, touching up and cleaning of fixtures before they are shipped. |
| 10           | MS-A          | NO       | E110       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 4.  |
| 11           | MS-A          | NO       | E111       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 3.  |
| 12           | MS-A          | NO       | E112       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 1.  |
| 13           | MS-A          | NO       | E113       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 2.  |
|              |               |          |            |                 |                      |  |
|              |               |          |            |                 |                      |  |
|              |               |          |            |                 |                      |  |
|              |               |          |            |                 |                      |  |

**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 |
|------------|---------------|-------------------------|
| 11/06/2024 | O2711         | RN102560372             |

| Unit ID No. | Registration No. | PBR No. | Registration Date |
|-------------|------------------|---------|-------------------|
| BOOTH1a     | 177386           | 106.262 | 09/13/2024        |
| BOOTH1b     | 177386           | 106.262 | 09/13/2024        |
| BOOTH2a     | 177386           | 106.262 | 09/13/2024        |
| BOOTH2b     | 177386           | 106.262 | 09/13/2024        |
| ST1         | 177386           | 106.262 | 09/13/2024        |
| ST2         | 177386           | 106.262 | 09/13/2024        |
| ST3         | 177386           | 106.262 | 09/13/2024        |
| E272        | 122015           | 106.262 | 08/14/2014        |
| E123        | 103917           | 106.264 | 01/09/2001        |
| E109        | 103928           | 106.264 | 01/02/2001        |
| E103        | 103931           | 106.264 | 02/19/1999        |

**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 |
|------------|---------------|-------------------------|
| 11/06/2024 | O2711         | RN102560372             |

| Unit ID No. | PBR No. | Version No./Date |
|-------------|---------|------------------|
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |

**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 |
|------------|---------------|-------------------------|
| 11/06/2024 | O2711         | RN102560372             |

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

**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 |
|------------|---------------|-------------------------|
| 11/06/2024 | O2711         | RN102560372             |

| Unit ID No. | PBR No. | Version No./Date Or Registration No. | Monitoring Requirement  |
|-------------|---------|--------------------------------------|---|
| BOOTH1a     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| BOOTH1b     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| BOOTH2a     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| BOOTH2b     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| ST1         | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| ST2         | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| ST3         | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| E272        | 106.262 | 122015                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| E123        | 106.264 | 103917                               | Maintain records of the emissions, production rate, throughput and/or capacity from the replacement facility. |

**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 |
|------------|---------------|-------------------------|
| 11/06/2024 | O2711         | RN102560372             |

| Unit ID No. | PBR No. | Version No./Date Or Registration No. | Monitoring Requirement  |
|-------------|---------|--------------------------------------|---|
| E109        | 106.264 | 103928                               | Maintain records of the emissions, production rate, throughput and/or capacity from the replacement facility. |
| E103        | 106.264 | 103931                               | Maintain records of the emissions, production rate, throughput and/or capacity from the replacement facility. |
|             |         |                                      |   |
|             |         |                                      |   |
|             |         |                                      |   |
|             |         |                                      |   |
|             |         |                                      |   |
|             |         |                                      |   |
|             |         |                                      |   |

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

**Table 1**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 11/06/2024 | O2711      | RN102560372          |

| Unit/Process<br>AI | Unit/Process<br>Revision No. | Unit/Process ID No. | Unit/Process<br>Applicable<br>Form | Unit/Process Name/ Description | Unit/Process<br>CAM | Preconstruction<br>Authorizations<br>30 TAC Chapter<br>116/ 30 TAC<br>Chapter 106 | Preconstruction<br>Authorizations Title I |
|--------------------|------------------------------|---------------------|------------------------------------|--------------------------------|---------------------|---|---|
| A                  | 1                            | BOOTH1a             | OP-UA66                            | Spray Coat Booth 1 Stack 1     |                     | 6414  |   |
| A                  | 2                            | BOOTH1b             | OP-UA66                            | Spray Coat Booth 1 Stack 2     |                     | 6414  |   |
| A                  | 3                            | BOOTH2a             | OP-UA66                            | Spray Coat Booth 2 Stack 1     |                     | 6414  |   |
| A                  | 4                            | BOOTH2b             | OP-UA66                            | Spray Coat Booth 2 Stack 2     |                     | 6414  |   |
| A                  | 5                            | ST1                 | OP-UA3                             | Resin Storage Tank 1           |                     | 6414  |   |
| A                  | 6                            | ST2                 | OP-UA3                             | Resin Storage Tank 2           |                     | 6414  |   |
| A                  | 7                            | ST3                 | OP-UA3                             | Resin Storage Tank 3           |                     | 6414  |   |
| A                  | 8                            | CLEANUP             | OP-SUMR                            | Cleanup Operations             |                     | 6414  |   |
| A                  | 9                            | FUG                 | OP-SUMR                            | Fugitives                      |                     | 6414  |   |
| D                  | 10                           | E110                | OP-SUMR                            | ACR Chop 4 Booth               |                     | 6414  |   |



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

**Table 1**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 11/06/2024 | O2711      | RN102560372          |

| Unit/Process<br>AI | Unit/Process<br>Revision No. | Unit/Process ID No. | Unit/Process<br>Applicable<br>Form | Unit/Process Name/ Description | Unit/Process<br>CAM | Preconstruction<br>Authorizations<br>30 TAC Chapter<br>116/ 30 TAC<br>Chapter 106 | Preconstruction<br>Authorizations Title I |
|--------------------|------------------------------|---------------------|------------------------------------|--------------------------------|---------------------|---|---|
| D                  | 11                           | E111                | OP-SUMR                            | ACR Chop 3 Booth               |                     | 6414  |   |
| D                  | 12                           | E112                | OP-SUMR                            | ACR Chop 1 Booth               |                     | 6414  |   |
| D                  | 13                           | E113                | OP-SUMR                            | ACR Chop 2 Booth               |                     | 6414  |   |
|                    |                              |                     |                                    |                                |                     |   |   |
|                    |                              |                     |                                    |                                |                     |   |   |
|                    |                              |                     |                                    |                                |                     |   |   |
|                    |                              |                     |                                    |                                |                     |   |   |
|                    |                              |                     |                                    |                                |                     |   |   |
|                    |                              |                     |                                    |                                |                     |   |   |
|                    |                              |                     |                                    |                                |                     |   |   |

**Storage Tank/Vessel Attributes**  
**Form OP-UA3 (Page 3)**  
**Federal Operating Permit Program**  
**Table 3: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**  
**Subpart Kb: Standards of Performance for Volatile Organic Liquid Storage Vessels**  
**(Including Petroleum Liquid Storage Vessels)**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 11/06/2024 | O2711      | RN102560372          |

| Unit ID No. | SOP/GOP Index No. | Product Stored | Storage Capacity | WW Tank Control | Maximum TVP | Storage Vessel Description | AMEL ID No. | Guidepole | Reid Vapor Pressure | Control Device ID No. |
|-------------|-------------------|----------------|------------------|-----------------|-------------|----------------------------|-------------|-----------|---------------------|-----------------------|
| ST1         | 60Kb-1            | VOL            | 10K-             |                 |             |                            |             |           |                     |                       |
| ST2         | 60Kb-1            | VOL            | 10K-             |                 |             |                            |             |           |                     |                       |
| ST3         | 60Kb-1            | VOL            | 10K-             |                 |             |                            |             |           |                     |                       |
|             |                   |                |                  |                 |             |                            |             |           |                     |                       |
|             |                   |                |                  |                 |             |                            |             |           |                     |                       |
|             |                   |                |                  |                 |             |                            |             |           |                     |                       |
|             |                   |                |                  |                 |             |                            |             |           |                     |                       |
|             |                   |                |                  |                 |             |                            |             |           |                     |                       |
|             |                   |                |                  |                 |             |                            |             |           |                     |                       |
|             |                   |                |                  |                 |             |                            |             |           |                     |                       |

**Reinforced Plastic Composites Production****Form OP-UA66 (Page 1)****Federal Operating Permit Program****Table 1a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)****Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production****Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 11/06/2024 | O2711      | RN102560372          |

| Process ID No. | SOP Index No. | Production Process Type | Compliance Option | 95% Reduction | Affected Source Type | Facility Type | Large Parts | Operation Type | CMS | Add-On Control Device |
|----------------|---------------|-------------------------|-------------------|---------------|----------------------|---------------|-------------|----------------|-----|-----------------------|
| BOOTH1a        | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
| BOOTH1b        | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
| BOOTH2a        | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
| BOOTH2b        | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |

## Carolyn Thomas

---

**From:** TVAPPS  
**Sent:** Tuesday, November 12, 2024 4:45 PM  
**To:** Carolyn Thomas  
**Subject:** FW: STEERS Title V Application Submittal (New Application)

Please Process.

Thank you,  
Richard Suniga  
APD/APIRT  
512.239.5325

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

From: [steers@tceq.texas.gov](mailto:steers@tceq.texas.gov) <[steers@tceq.texas.gov](mailto:steers@tceq.texas.gov)>  
Sent: Tuesday, November 12, 2024 12:30 PM  
To: RFCAIR3 <[RFCAIR3@tceq.texas.gov](mailto:RFCAIR3@tceq.texas.gov)>; TVAPPS <[tvapps@tceq.texas.gov](mailto:tvapps@tceq.texas.gov)>  
Subject: STEERS Title V Application Submittal (New Application)

The TV-E application has been successfully submitted by DALE LEPP. The submittal was received at 11/12/2024 12:29 PM.

The Reference number for this submittal is 702178

The confirmation number for this submittal is 579542.

The Area ID for this submittal is 2711.

The Project ID for this submittal is 37391.

The hash code for this submittal is 6BF9B443D2620C241372BF4F624A5A6793518555BBAD9F79512C5C23E4023FAF.

You may access the original application submittal and the notice of final action documents from the COR Viewer which is available at <https://ida.tceq.texas.gov/steersstaff/index.cfm?fuseaction=openadmin.submitlog&newsearch=yes>.

If you have any questions, please contact the STEERS Help Line at 512-239-6925 or by e-mail at [steers@tceq.texas.gov](mailto:steers@tceq.texas.gov).

**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. |
|------------|------------|----------------------|
| 11/06/2024 | O2711      | RN102560372          |

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 |
|-------------------|---------------|-------------------|---------------|-------------------|---------------|
| 6414              | 09/20/2024    |                   |               |                   |               |
|                   |               |                   |               |                   |               |
|                   |               |                   |               |                   |               |
|                   |               |                   |               |                   |               |

- ◆ **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 |
|---------|------------------|---------|------------------|---------|------------------|
| 106.262 | 11/01/2003       | SE 86   | 05/12/1981       |         |                  |
| 106.183 | 09/04/2000       |         |                  |         |                  |
| 106.265 | 09/04/2000       |         |                  |         |                  |
| 106.472 | 09/04/2000       |         |                  |         |                  |
| SE 3    | 09/12/1989       |         |                  |         |                  |
| SE 7    | 09/12/1989       |         |                  |         |                  |
| SE 11   | 05/04/1994       |         |                  |         |                  |
| SE 40   | 05/05/1976       |         |                  |         |                  |

- ◆ **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 |
|------------|---------------|------------|---------------|------------|---------------|
|            |               |            |               |            |               |
|            |               |            |               |            |               |
|            |               |            |               |            |               |
|            |               |            |               |            |               |

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

|  |  |
|--|--|
| Date: <b>11/06/2024</b>  |  |
| Permit No.: <b>O2711</b>   |  |
| Regulated Entity No.: <b>RN102560372</b>   |  |
| Company Name: <b>The Kohler Co.</b>  |  |
| For Submissions to EPA   |  |
| Has an electronic copy of this application been submitted (or is being submitted) to EPA? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span> |  |
| <b>I. Application Type</b>   |  |
| Indicate the type of application:  |  |
| <input type="checkbox"/> Renewal   |  |
| <input checked="" type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)   |  |
| <input type="checkbox"/> Significant Revision  |  |
| <input type="checkbox"/> Revision Requesting Prior Approval  |  |
| <input type="checkbox"/> Administrative Revision   |  |
| <input type="checkbox"/> Response to Reopening   |  |
| <b>II. Qualification Statement</b>   |  |
| For SOP Revisions Only <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>  |  |
| For GOP Revisions Only <span style="float: right;"><input type="checkbox"/> YES <input type="checkbox"/> NO</span>   |  |

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

**III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)**

Indicate all pollutants for which the site is a major source based on the site's potential to emit:  
(Check the appropriate box[es].)

☒ VOC      ☐ NO<sub>x</sub>      ☐ SO<sub>2</sub>      ☐ PM<sub>10</sub>      ☐ CO      ☐ Pb      ☒ HAP

Other:

**IV. Reference Only Requirements (For reference only)**

Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)?      ☒ YES    ☐ NO    ☐ N/A

**V. Delinquent Fees and Penalties**

Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.

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

|                                   |
|-----------------------------------|
| Date: 11/06/2024                  |
| Permit No.: O2711                 |
| Regulated Entity No.: RN102560372 |
| Company Name: The Kohler Co.      |

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

| Revision No. | Revision Code |          | Unit/Group | Process         | NSR<br>Authorization | Description of Change and Provisional<br>Terms and Conditions                   |
|--------------|---------------|----------|------------|-----------------|----------------------|---|
|              |               | New Unit | ID No.     | Applicable Form |                      |   |
| 1            | MS-A          | YES      | BOOTH1a    | OP-UA66         | 6414                 | Addition of spray coat booth 1 stack 1 subject to the requirements of MACT WWW. |
| 2            | MS-A          | YES      | BOOTH1b    | OP-UA66         | 6414                 | Addition of spray coat booth 1 stack 2 subject to the requirements of MACT WWW. |
| 3            | MS-A          | YES      | BOOTH2a    | OP-UA66         | 6414                 | Addition of spray coat booth 2 stack 1 subject to the requirements of MACT WWW. |
| 4            | MS-A          | YES      | BOOTH2b    | OP-UA66         | 6414                 | Addition of spray coat booth 2 stack 2 subject to the requirements of MACT WWW. |
| 5            | MS-A          | YES      | ST1        | OP-UA3          | 6414                 | Addition of resin storage tank.   |
| 6            | MS-A          | YES      | ST2        | OP-UA3          | 6414                 | Addition of resin storage tank.   |
| 7            | MS-A          | YES      | ST3        | OP-UA3          | 6414                 | Addition of resin storage tank.   |
| 8            | MS-A          | YES      | CLEANUP    | OP-SUMR         | 6414                 | Addition of cleanup operations.   |



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

|                                   |
|-----------------------------------|
| Date: 11/06/2024                  |
| Permit No.: O2711                 |
| Regulated Entity No.: RN102560372 |
| Company Name: The Kohler Co.      |

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

| Revision No. | Revision Code |          | Unit/Group | Process         | NSR<br>Authorization | Description of Change and Provisional<br>Terms and Conditions  |
|--------------|---------------|----------|------------|-----------------|----------------------|--|
|              |               | New Unit | ID No.     | Applicable Form |                      |  |
| 9            | MS-A          | YES      | FUG        | OP-SUMR         | 6414                 | Addition of fugitive emissions from finishing, touching up and cleaning of fixtures before they are shipped. |
| 10           | MS-A          | NO       | E110       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 4.  |
| 11           | MS-A          | NO       | E111       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 3.  |
| 12           | MS-A          | NO       | E112       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 1.  |
| 13           | MS-A          | NO       | E113       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 2.  |
|              |               |          |            |                 |                      |  |
|              |               |          |            |                 |                      |  |
|              |               |          |            |                 |                      |  |
|              |               |          |            |                 |                      |  |

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

|  |   |
|--|---|
| Date: <b>11/15/2024</b>  |   |
| Permit No.: <b>O2711</b>   |   |
| Regulated Entity No.: <b>RN102560372</b>   |   |
| Company Name: <b>Kohler Co.</b>  |   |
| For Submissions to EPA   |   |
| Has an electronic copy of this application been submitted (or is being submitted) to EPA? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span> |   |
| <b>I. Application Type</b>   |   |
| Indicate the type of application:  |   |
| <input type="checkbox"/> Renewal   |   |
| <input checked="" type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)   |   |
| <input type="checkbox"/> Significant Revision  |   |
| <input type="checkbox"/> Revision Requesting Prior Approval  |   |
| <input type="checkbox"/> Administrative Revision   |   |
| <input type="checkbox"/> Response to Reopening   |   |
| <b>II. Qualification Statement</b>   |   |
| For SOP Revisions Only   | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| For GOP Revisions Only   | <input type="checkbox"/> YES <input type="checkbox"/> NO            |

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

|   |
|---|
| <b>III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)</b>   |
| Indicate all pollutants for which the site is a major source based on the site's potential to emit:<br><i>(Check the appropriate box[es].)</i>  |
| <input checked="" type="checkbox"/> VOC <input type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> CO <input type="checkbox"/> Pb <input checked="" type="checkbox"/> HAP |
| Other:  |
| <b>IV. Reference Only Requirements (For reference only)</b>   |
| Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A</span>                         |
| <b>V. Delinquent Fees and Penalties</b>   |
| Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.                                |

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

|                                   |
|-----------------------------------|
| Date: 11/15/2024                  |
| Permit No.: O2711                 |
| Regulated Entity No.: RN102560372 |
| Company Name: Kohler Co.          |

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

| Revision No. | Revision Code |          | Unit/Group | Process         | NSR<br>Authorization | Description of Change and Provisional<br>Terms and Conditions                   |
|--------------|---------------|----------|------------|-----------------|----------------------|---|
|              |               | New Unit | ID No.     | Applicable Form |                      |   |
| 1            | MS-A          | YES      | BOOTH1a    | OP-UA66         | 6414                 | Addition of spray coat booth 1 stack 1 subject to the requirements of MACT WWW. |
| 2            | MS-A          | YES      | BOOTH1b    | OP-UA66         | 6414                 | Addition of spray coat booth 1 stack 2 subject to the requirements of MACT WWW. |
| 3            | MS-A          | YES      | BOOTH2a    | OP-UA66         | 6414                 | Addition of spray coat booth 2 stack 1 subject to the requirements of MACT WWW. |
| 4            | MS-A          | YES      | BOOTH2b    | OP-UA66         | 6414                 | Addition of spray coat booth 2 stack 2 subject to the requirements of MACT WWW. |
| 5            | MS-A          | YES      | ST1        | OP-UA3          | 6414                 | Addition of resin storage tank.   |
| 6            | MS-A          | YES      | ST2        | OP-UA3          | 6414                 | Addition of resin storage tank.   |
| 7            | MS-A          | YES      | ST3        | OP-UA3          | 6414                 | Addition of resin storage tank.   |
| 8            | MS-A          | YES      | CLEANUP    | OP-SUMR         | 6414                 | Addition of cleanup operations.   |

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

|                                   |
|-----------------------------------|
| Date: 11/15/2024                  |
| Permit No.: O2711                 |
| Regulated Entity No.: RN102560372 |
| Company Name: Kohler Co.          |

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

| Revision No. | Revision Code |          | Unit/Group | Process         | NSR<br>Authorization | Description of Change and Provisional<br>Terms and Conditions  |
|--------------|---------------|----------|------------|-----------------|----------------------|--|
|              |               | New Unit | ID No.     | Applicable Form |                      |  |
| 9            | MS-A          | YES      | FUG        | OP-SUMR         | 6414                 | Addition of fugitive emissions from finishing, touching up and cleaning of fixtures before they are shipped. |
| 10           | MS-A          | NO       | E110       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 4.  |
| 11           | MS-A          | NO       | E111       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 3.  |
| 12           | MS-A          | NO       | E112       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 1.  |
| 13           | MS-A          | NO       | E113       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 2.  |
|              |               |          |            |                 |                      |  |
|              |               |          |            |                 |                      |  |
|              |               |          |            |                 |                      |  |
|              |               |          |            |                 |                      |  |

## Carolyn Thomas

---

**From:** Carolyn Thomas  
**Sent:** Friday, November 15, 2024 9:19 AM  
**To:** Dale.Lepp@Kohler.com; nhalageri@trccompanies.com  
**Subject:** Kohler Co. Title V Permit 2711, Project 37391

We have received your application for the above referenced facility and it is currently under review. The following item(s) are required before we can declare the application administratively complete:

- Please send an updated OP-2 Page 1- Update Company name to Kohler Co.
- Please provide an OP-1 to update the Technical Contact from Dustin Tarrant to Natasha Halageri per the COR.

Thank you,  
Carolyn Thomas  
Air Permits Initial Review Team  
Air Permits Division, MC 161  
Office of Air Texas Commission on Environmental Quality  
Phone: (512) 239-5127  
Fax: (512) 233-0973  
E-mail: [carolyn.thomas@tceq.texas.gov](mailto:carolyn.thomas@tceq.texas.gov)  
Web site: [www.tceq.texas.gov](http://www.tceq.texas.gov)  
Please consider whether it is necessary to print this e-mail.  
How are we doing? [www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

## Carolyn Thomas

---

**From:** Halageri, Natasha <NHalageri@trccompanies.com>  
**Sent:** Friday, November 15, 2024 1:21 PM  
**To:** Carolyn Thomas; Dale.Lepp@Kohler.com  
**Subject:** RE: [EXTERNAL] Kohler Co. Title V Permit 2711, Project 37391  
**Attachments:** OP-1.docx; Form OP-2\_v2.docx

Hi Carolyn,

Please see attached the requested forms.

Thanks,  
Natasha

---

**From:** Carolyn Thomas <Carolyn.Thomas@tceq.texas.gov>  
**Sent:** Friday, November 15, 2024 9:19 AM  
**To:** Dale.Lepp@Kohler.com; Halageri, Natasha <NHalageri@trccompanies.com>  
**Subject:** [EXTERNAL] Kohler Co. Title V Permit 2711, Project 37391

This is an **External** email. Do not click links or open attachments unless you validate the sender and know the content is safe.

**ALWAYS** hover over the link to preview the actual URL/site and confirm its legitimacy.

We have received your application for the above referenced facility and it is currently under review. The following item(s) are required before we can declare the application administratively complete:

- Please send an updated OP-2 Page 1- Update Company name to Kohler Co.
- Please provide an OP-1 to update the Technical Contact from Dustin Tarrant to Natasha Halageri per the COR.

Thank you,  
Carolyn Thomas  
Air Permits Initial Review Team  
Air Permits Division, MC 161  
Office of Air Texas Commission on Environmental Quality  
Phone: (512) 239-5127  
Fax: (512) 233-0973  
E-mail: [carolyn.thomas@tceq.texas.gov](mailto:carolyn.thomas@tceq.texas.gov)  
Web site: [www.tceq.texas.gov](http://www.tceq.texas.gov)  
Please consider whether it is necessary to print this e-mail.  
How are we doing? [www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

**Reinforced Plastic Composites Production  
Form OP-UA66 (Page 1)**

**Federal Operating Permit Program**

**Table 1a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)**

**Subpart WWW: National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production  
Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 01/08/2025 | O-2711     | RN102560372          |

| Process ID No. | SOP Index No. | Production Process Type | Compliance Option | 95% Reduction | Affected Source Type | Facility Type | Large Parts | Operation Type | CMS | Add-On Control Device |
|----------------|---------------|-------------------------|-------------------|---------------|----------------------|---------------|-------------|----------------|-----|-----------------------|
| BOOTH1a        | 63WWW         | WWW                     | 5810-C            | 95%NO         | NEW                  | 100+          | LRG         | ONCRMEC        |     | NO                    |
| BOOTH1b        | 63WWW         | WWW                     | 5810-C            | 95%NO         | NEW                  | 100+          | LRG         | ONCRMEC        |     | NO                    |
| BOOTH2a        | 63WWW         | WWW                     | 5810-C            | 95%NO         | NEW                  | 100+          | LRG         | ONCRMEC        |     | NO                    |
| BOOTH2b        | 63WWW         | WWW                     | 5810-C            | 95%NO         | NEW                  | 100+          | LRG         | ONCRMEC        |     | NO                    |
| E080           | 63WWW         | WWW                     | 5810-C            | 95%NO         | EXIST                | 100+          |             | ONCRMEC        |     | NO                    |
| E081           | 63WWW         | WWW                     | 5810-C            | 95%NO         | EXIST                | 100+          |             | ONCRMEC        |     | NO                    |
| E082           | 63WWW         | WWW                     | 5810-C            | 95%NO         | EXIST                | 100+          |             | ONCRMEC        |     | NO                    |
| E083           | 63WWW         | WWW                     | 5810-C            | 95%NO         | EXIST                | 100+          |             | ONCRMEC        |     | NO                    |
| E084           | 63WWW         | WWW                     | 5810-C            | 95%NO         | EXIST                | 100+          |             | ONCRMEC        |     | NO                    |
|                |               |                         |                   |               |                      |               |             |                |     |                       |



**Reinforced Plastic Composites Production**

**Form OP-UA66 (Page 1)**

**Federal Operating Permit Program**

**Table 1a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)**

**Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 01/08/2025 | O-2711     | RN102560372          |

| Process ID No. | SOP Index No. | Production Process Type | Compliance Option | 95% Reduction | Affected Source Type | Facility Type | Large Parts | Operation Type | CMS | Add-On Control Device |
|----------------|---------------|-------------------------|-------------------|---------------|----------------------|---------------|-------------|----------------|-----|-----------------------|
| E110           | 63WWWW        | WWWW                    | 5810-C            | 95%NO         | EXIST                | 100+          |             | ONCRMEC        |     | NO                    |
| E111           | 63WWWW        | WWWW                    | 5810-C            | 95%NO         | EXIST                | 100+          |             | ONCRMEC        |     | NO                    |
| E112           | 63WWWW        | WWWW                    | 5810-C            | 95%NO         | EXIST                | 100+          |             | ONCRMEC        |     | NO                    |
| E113           | 63WWWW        | WWWW                    | 5810-C            | 95%NO         | EXIST                | 100+          |             | ONCRMEC        |     | NO                    |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |

**Reinforced Plastic Composites Production****Form OP-UA66 (Page 1)****Federal Operating Permit Program****Table 1a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)****Subpart WWW: National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production  
Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 01/17/2025 | O-2711     | RN102560372          |

| Process ID No. | SOP Index No. | Production Process Type | Compliance Option | 95% Reduction | Affected Source Type | Facility Type | Large Parts | Operation Type | CMS | Add-On Control Device |
|----------------|---------------|-------------------------|-------------------|---------------|----------------------|---------------|-------------|----------------|-----|-----------------------|
| BOOTH1a        | 63WWW         | WWW                     | 5810-C            |               |                      |               |             |                | YES | NO                    |
| BOOTH1b        | 63WWW         | WWW                     | 5810-C            |               |                      |               |             |                | YES | NO                    |
| BOOTH2a        | 63WWW         | WWW                     | 5810-C            |               |                      |               |             |                | YES | NO                    |
| BOOTH2b        | 63WWW         | WWW                     | 5810-C            |               |                      |               |             |                | YES | NO                    |
| E080           | 63WWW         | WWW                     | 5810-C            |               |                      |               |             |                | YES | NO                    |
| E081           | 63WWW         | WWW                     | 5810-C            |               |                      |               |             |                | YES | NO                    |
| E082           | 63WWW         | WWW                     | 5810-C            |               |                      |               |             |                | YES | NO                    |
| E083           | 63WWW         | WWW                     | 5810-C            |               |                      |               |             |                | YES | NO                    |
| E084           | 63WWW         | WWW                     | 5810-C            |               |                      |               |             |                | YES | NO                    |
|                |               |                         |                   |               |                      |               |             |                |     |                       |

**Reinforced Plastic Composites Production**

**Form OP-UA66 (Page 1)**

**Federal Operating Permit Program**

**Table 1a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)**

**Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 01/17/2025 | O-2711     | RN102560372          |

| Process ID No. | SOP Index No. | Production Process Type | Compliance Option | 95% Reduction | Affected Source Type | Facility Type | Large Parts | Operation Type | CMS | Add-On Control Device |
|----------------|---------------|-------------------------|-------------------|---------------|----------------------|---------------|-------------|----------------|-----|-----------------------|
| E110           | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
| E111           | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
| E112           | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
| E113           | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |

**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 |
|------------|---------------|-------------------------|
| 02/05/2025 | O2711         | RN102560372             |

| Unit ID No. | Registration No. | PBR No.          | Registration Date |
|-------------|------------------|------------------|-------------------|
| BOOTH1a     | 177386           | 106.262          | 09/13/2024        |
| BOOTH1b     | 177386           | 106.262          | 09/13/2024        |
| BOOTH2a     | 177386           | 106.262          | 09/13/2024        |
| BOOTH2b     | 177386           | 106.262          | 09/13/2024        |
| ST1         | 177386           | 106.262          | 09/13/2024        |
| ST2         | 177386           | 106.262          | 09/13/2024        |
| ST3         | 177386           | 106.262          | 09/13/2024        |
| E272        | 122015           | 106.262          | 08/14/2014        |
| E123        | 103917           | 106.264          | 01/09/2001        |
| E109        | 103928           | 106.264, 106.183 | 02/13/2001        |
| E103        | 103931           | 106.264          | 02/19/1999        |
| BOILER      | 103998           | SE7              | 09/21/1993        |
|             |                  |                  |                   |

**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 |
|------------|---------------|-------------------------|
| 02/05/2025 | O2711         | RN102560372             |

| Unit ID No. | PBR No. | Version No./Date |
|-------------|---------|------------------|
| COMFORTHT   | SE3     | 07/15/1988       |
|             |         |                  |
|             |         |                  |
|             |         |                  |
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|             |         |                  |
|             |         |                  |
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|             |         |                  |

**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 |
|------------|---------------|-------------------------|
| 02/05/2025 | O2711         | RN102560372             |

| PBR No. | Version No./Date |
|---------|------------------|
|         |                  |
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**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 |
|------------|---------------|-------------------------|
| 02/05/2025 | O2711         | RN102560372             |

| Unit ID No. | PBR No. | Version No./Date Or Registration No. | Monitoring Requirement  |
|-------------|---------|--------------------------------------|---|
| BOOTH1a     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| BOOTH1b     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| BOOTH2a     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| BOOTH2b     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| ST1         | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| ST2         | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| ST3         | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| E272        | 106.262 | 122015                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| E123        | 106.264 | 103917                               | Maintain records of the emissions, production rate, throughput and/or capacity from the replacement facility. |

**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 |
|------------|---------------|-------------------------|
| 02/05/2025 | O2711         | RN102560372             |

| Unit ID No. | PBR No.          | Version No./Date Or Registration No. | Monitoring Requirement   |
|-------------|------------------|--------------------------------------|--|
| E109        | 106.264, 106.183 | 103928                               | Maintain records of the emissions, production rate, throughput and/or capacity from the replacement facility.<br>Maintain records of fuel usage. |
| E103        | 106.264          | 103931                               | Maintain records of the emissions, production rate, throughput and/or capacity from the replacement facility.                                    |
| BOILER      | SE7              | 103998                               | Maintain records of fuel usage.  |
|             |                  |                                      |  |
|             |                  |                                      |  |
|             |                  |                                      |  |
|             |                  |                                      |  |
|             |                  |                                      |  |
|             |                  |                                      |  |



**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. |
|------------|------------|----------------------|
| 02/05/2025 | O2711      | RN102560372          |

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 |
|-------------------|---------------|-------------------|---------------|-------------------|---------------|
| 6414              | 09/20/2024    |                   |               |                   |               |
|                   |               |                   |               |                   |               |
|                   |               |                   |               |                   |               |
|                   |               |                   |               |                   |               |

- ◆ **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 |
|---------|------------------|---------|------------------|---------|------------------|
| 106.262 | 11/01/2003       |         |                  |         |                  |
| 106.183 | 09/04/2000       |         |                  |         |                  |
| 106.264 | 09/04/2000       |         |                  |         |                  |
| 106.472 | 09/04/2000       |         |                  |         |                  |
| SE 3    | 07/15/1988       |         |                  |         |                  |
| SE 7    | 09/21/1993       |         |                  |         |                  |
|         |                  |         |                  |         |                  |
|         |                  |         |                  |         |                  |

- ◆ **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 |
|------------|---------------|------------|---------------|------------|---------------|
|            |               |            |               |            |               |
|            |               |            |               |            |               |
|            |               |            |               |            |               |
|            |               |            |               |            |               |

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

| Date       | Permit Number | Regulated Entity Number |
|------------|---------------|-------------------------|
| 04/08/2025 | O2711         | RN102560372             |

| Unit ID No. | Registration No. | PBR No.          | Registration Date |
|-------------|------------------|------------------|-------------------|
| BOOTH1a     | 177386           | 106.262          | 09/13/2024        |
| BOOTH1b     | 177386           | 106.262          | 09/13/2024        |
| BOOTH2a     | 177386           | 106.262          | 09/13/2024        |
| BOOTH2b     | 177386           | 106.262          | 09/13/2024        |
| ST1         | 177386           | 106.262          | 09/13/2024        |
| ST2         | 177386           | 106.262          | 09/13/2024        |
| ST3         | 177386           | 106.262          | 09/13/2024        |
| E272        | 122015           | 106.262          | 08/14/2014        |
| E123        | 103917           | 106.264          | 01/09/2001        |
| E109        | 103928           | 106.264, 106.183 | 02/13/2001        |
| E103        | 103931           | 106.264          | 02/19/1999        |
| BOILER      | 103998           | SE7              | 09/21/1993        |

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

| Date       | Permit Number | Regulated Entity Number |
|------------|---------------|-------------------------|
| 04/08/2025 | O2711         | RN102560372             |

| Unit ID No. | PBR No. | Version No./Date |
|-------------|---------|------------------|
| COMFORTHT   | SE3     | 07/15/1988       |
| E130        | 106.472 | 09/04/2000       |
| E131        | 106.472 | 09/04/2000       |
| E254        | 106.472 | 09/04/2000       |
|             |         |                  |
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|             |         |                  |

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

| Date       | Permit Number | Regulated Entity Number |
|------------|---------------|-------------------------|
| 04/08/2025 | O2711         | RN102560372             |

| PBR No. | Version No./Date |
|---------|------------------|
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**Permit By Rule Supplemental Table (Page 4)**  
**Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area**  
**Texas Commission on Environmental Quality**

| Date       | Permit Number | Regulated Entity Number |
|------------|---------------|-------------------------|
| 04/08/2025 | O2711         | RN102560372             |

| Unit ID No. | PBR No. | Version No./Date Or Registration No. | Monitoring Requirement  |
|-------------|---------|--------------------------------------|---|
| BOOTH1a     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| BOOTH1b     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| BOOTH2a     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| BOOTH2b     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| ST1         | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| ST2         | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| ST3         | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| E272        | 106.262 | 122015                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| E123        | 106.264 | 103917                               | Maintain records of the emissions, production rate, throughput and/or capacity from the replacement facility. |

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

| Date       | Permit Number | Regulated Entity Number |
|------------|---------------|-------------------------|
| 04/08/2025 | O2711         | RN102560372             |

| Unit ID No. | PBR No.          | Version No./Date Or Registration No. | Monitoring Requirement  |
|-------------|------------------|--------------------------------------|---|
| E109        | 106.264, 106.183 | 103928                               | Maintain records of the emissions, production rate, throughput and/or capacity from the replacement facility.<br>Maintain records of fuel usage.  |
| E103        | 106.264          | 103931                               | Maintain records of the emissions, production rate, throughput and/or capacity from the replacement facility.   |
| BOILER      | SE7              | 103998                               | Maintain records of fuel usage.   |
| E130        | 106.472          | 09/04/2000                           | Maintain records of the amount of liquids loaded or unloaded at the site. Verify that there are no visible emissions from loading or unloading. Storage tank emissions should be less than applicable emission limit under 30 TAC §106.4(a)(1) - (3). Chemicals stored in the tank are limited to list of chemicals provided under 30 TAC §106.472 (1)-(9). |
| E131        | 106.472          | 09/04/2000                           | Maintain records of the amount of liquids loaded or unloaded at the site. Verify that there are no visible emissions from loading or unloading. Storage tank emissions should be less than applicable emission limit under 30 TAC §106.4(a)(1) - (3). Chemicals stored in the tank are limited to list of chemicals provided under 30 TAC §106.472 (1)-(9). |
| E254        | 106.472          | 09/04/2000                           | Maintain records of the amount of liquids loaded or unloaded at the site. Verify that there are no visible emissions from loading or unloading. Storage tank emissions should be less than applicable emission limit under 30 TAC §106.4(a)(1) - (3). Chemicals stored in the tank are limited to list of chemicals provided under 30 TAC §106.472 (1)-(9). |

## Texas Commission on Environmental Quality

Title V Existing

2711

### Site Information (Regulated Entity)

|   |   |
|---|---|
| What is the name of the permit area to be authorized? | KOHLER PLASTICS PLANT                   |
| Does the site have a physical address?                | Yes                                     |
| Physical Address                                      |   |
| Number and Street                                     | 4601 HIGHWAY 377 S                      |
| City  | BROWNWOOD                               |
| State   | TX                                      |
| ZIP   | 76801                                   |
| County  | BROWN                                   |
| Latitude (N) (##.#####)                               | 31.663888                               |
| Longitude (W) (-###.#####)                            | 98.996944                               |
| Primary SIC Code                                      | 3261                                    |
| Secondary SIC Code                                    |   |
| Primary NAICS Code                                    | 327110                                  |
| Secondary NAICS Code                                  |   |
| Regulated Entity Site Information                     |   |
| What is the Regulated Entity's Number (RN)?           | RN102560372                             |
| What is the name of the Regulated Entity (RE)?        | KOHLER BROWNWOOD VITREOUS PLANT         |
| Does the RE site have a physical address?             | Yes                                     |
| Physical Address                                      |   |
| Number and Street                                     | 4601 HIGHWAY 377 S                      |
| City  | BROWNWOOD                               |
| State   | TX                                      |
| ZIP   | 76801                                   |
| County  | BROWN                                   |
| Latitude (N) (##.#####)                               | 31.664722                               |
| Longitude (W) (-###.#####)                            | -98.9975                                |
| Facility NAICS Code                                   |   |
| What is the primary business of this entity?          | INDUSTRIAL CHEMICAL MANUFACTURING PLANT |

## Customer (Applicant) Information

|  |                |
|--|----------------|
| How is this applicant associated with this site? | Owner Operator |
| What is the applicant's Customer Number (CN)?    | CN600127039    |
| Type of Customer                                 | Corporation    |
| Full legal name of the applicant:                |                |
| Legal Name                                       | Kohler Co.     |
| Texas SOS Filing Number                          | 673606         |
| Federal Tax ID                                   | 390402810      |
| State Franchise Tax ID                           | 13904028100    |
| State Sales Tax ID                               |                |
| Local Tax ID                                     |                |
| DUNS Number                                      | 6073225        |
| Number of Employees                              | 501+           |
| Independently Owned and Operated?                | Yes            |

## Responsible Official Contact

|  |                         |
|--|-------------------------|
| Person TCEQ should contact for questions about this application: |                         |
| Organization Name  | KOHLER CO               |
| Prefix   | MR                      |
| First  | DALE                    |
| Middle   |                         |
| Last   | LEPP                    |
| Suffix   |                         |
| Credentials  |                         |
| Title  | PLASTICS SUPERINTENDENT |
| Enter new address or copy one from list:                         |                         |
| Mailing Address  |                         |
| Address Type   | Domestic                |
| Mailing Address (include Suite or Bldg. here, if applicable)     | 4601 HIGHWAY 377 S      |
| Routing (such as Mail Code, Dept., or Attn:)                     |                         |
| City   | BROWNWOOD               |
| State  | TX                      |
| ZIP  | 76801                   |



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

3252032186

Extension

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

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

3256415834

E-mail

dale.lepp@kohler.com

## Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application

Select existing DAR contact or enter a new contact.

New Contact

Organization Name

Kohler Co

Prefix

MS

First

Randi

Middle

Last

Schmidling

Suffix

Credentials

Title

EHS Manager

Enter new address or copy one from list

Mailing Address

Address Type

Domestic

Mailing Address (include Suite or Bldg. here, if applicable)

4601 HIGHWAY 377 S

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

City

BROWNWOOD

State

TX

Zip

76801

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

3252060195

Extension

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

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

E-mail

randi.schmidling@kohler.com

## Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

Organization Name

Prefix

First

Middle

Last

Suffix

Credentials

Title

Enter new address or copy one from list:

Mailing Address

Address Type

Mailing Address (include Suite or Bldg. here, if applicable)

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

City

State

ZIP

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

Extension

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

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

E-mail

NATASHA HALAGERI(SOUTHWEST SHIPY... )

SOUTHWEST SHIPYARD LP

MS

NATASHA

HALAGERI

PROJECT MANAGER

Domestic

230 W MONROE ST STE 630

CHICAGO

IL

60606

6013237775

nhalageri@trccompanies.com

## Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

31 Deg 39 Min 50 Sec

3) Permit Longitude Coordinate:

98 Deg 59 Min 49 Sec

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

Update

4.1. Select the permit/project number for which this update should be applied.

2711-37391

5) Who will electronically sign this Title V application?

Responsible Official

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

No

## Title V Attachments Existing

Attach OP-1 (Site Information Summary)

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

Attach OP-ACPS (Application Compliance Plan and Schedule)

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

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

[File Properties]

File Name

[OP-PBRSUP \(2025-04-08\).docx](/ePermitsExternal/faces/file?fileId=250317)

Hash

FD9E52313D260D46287A13C1D7B05AE3A0CCA662C4430168423AAA36647C49DD

MIME-Type

application/vnd.openxmlformats-officedocument.wordprocessingml.document

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

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

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

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

## Certification

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

1. I am Dale Lepp, the owner of the STEERS account ER075091.
2. I have the authority to sign this data on behalf of the applicant named above.
3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
8. I am knowingly and intentionally signing Title V Existing 2711.
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: Dale Lepp OWNER OPERATOR

|                                      |  |
|--------------------------------------|--|
| Account Number:                      | ER075091   |
| Signature IP Address:                | 170.85.99.102  |
| Signature Date:                      | 2025-05-16   |
| Signature Hash:                      | B18C08534F5FA68F31AAA85198278EA695BA3A2D6ECBCA593CEFF6A62D6FCA7A |
| Form Hash Code at time of Signature: | AF108CC3BFAC9284E87D3B9CD7731935020E5955C20D4BF01C9C7FAF21215C4F |

## Submission

|                      |   |
|----------------------|---|
| Reference Number:    | The application reference number is 776948                  |
| Submitted by:        | The application was submitted by ER075091/Dale Lepp         |
| Submitted Timestamp: | The application was submitted on 2025-05-16 at 09:30:39 CDT |
| Submitted From:      | The application was submitted from IP address 170.85.99.102 |
| Confirmation Number: | The confirmation number is 653482                           |
| Steers Version:      | The STEERS version is 6.91                                  |
| Permit Number:       | The permit number is 2711                                   |

## Additional Information

Application Creator: This account was created by Stephanie P Mckay

---

## Ryan Glaze

---

**From:** Jason Nall <Jason.Nall@kohler.com>  
**Sent:** Thursday, May 15, 2025 2:07 PM  
**To:** Ryan Glaze; Ideris, Alan  
**Cc:** Halageri, Natasha; McKay, Stephanie  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

My apologies. I will follow up personally with the plant manager to make this happen by the end of this week. Hopefully today yet.

Thank You,

Jason

**Jason Nall, P.E.\***

Manager - Global EHS

Kohler Co.

Cell: 920.226.8046

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\*Professional Engineer in WI

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**From:** Ryan Glaze <James.Glaze@tceq.texas.gov>  
**Sent:** Thursday, May 15, 2025 1:46 PM  
**To:** Ideris, Alan <Alderis@trccompanies.com>  
**Cc:** Halageri, Natasha <NHalageri@trccompanies.com>; Jason Nall <Jason.Nall@kohler.com>; McKay, Stephanie <SMcKay@trccompanies.com>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Good afternoon Alan,

I just wanted to know how it was going to get the STEERS documentation signed. I have the public notice package ready to go out but until I get the STEERS submission I cannot do so. If you need more time or have any questions, please let me know.

Thanks,

***Ryan Glaze***

Operating Permits Section

Air Permits Division

Texas Commission on Environmental Quality  
P.O. Box 13087 MC 163  
Austin, TX, 78711  
(512) 239-6212



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**From:** Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>  
**Sent:** Friday, May 9, 2025 4:41 PM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>; Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; McKay, Stephanie <[SMcKay@trccompanies.com](mailto:SMcKay@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

I believe the STEERS upload still needs to be signed, I will get back with you.

Thanks,

Alan "A.J." Ideris

Houston Office Practice Leader – Air Quality Consulting  
Environmental, Health, Safety, and Sustainability Practice



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**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Thursday, May 8, 2025 4:23 PM  
**To:** Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>  
**Cc:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>; Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; McKay, Stephanie <[SMcKay@trccompanies.com](mailto:SMcKay@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Good afternoon Alan,

I just wanted to confirm that the updated OP-PBR SUP has been submitted to STEERS. I have gotten approval to send out the public notice package however I haven't received the updated OP-PBR SUP in STEERS yet. If you could please provide an update on this that would be great.

Thanks,

***Ryan Glaze***

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Air Permits Division  
Texas Commission on Environmental Quality  
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**From:** Ryan Glaze  
**Sent:** Tuesday, April 22, 2025 9:49 AM  
**To:** Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>  
**Cc:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>; Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; McKay, Stephanie <[SMcKay@trccompanies.com](mailto:SMcKay@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Good morning Alan,

Thank you for letting me know about this, with that in mind if you haven't done so already, please submit the updated OP-PBRSUP to certify the documented. Once that is done and I get final approval from my team leader we should be ready to send out our project. Please let me know if you have any questions.

Thanks,

***Ryan Glaze***

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Air Permits Division  
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**From:** Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>  
**Sent:** Monday, April 21, 2025 4:18 PM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>; Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; McKay, Stephanie <[SMcKay@trccompanies.com](mailto:SMcKay@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Good Afternoon Mr. Glaze,



It turns out that PBR Registration No. 87554 is not associated with O2711, but rather OP2712, so it is already covered in that Title V permit.

Thanks,

Alan "A.J." Ideris

Houston Office Practice Leader – Air Quality Consulting  
Environmental, Health, Safety, and Sustainability Practice



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---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Sent:** Tuesday, April 15, 2025 4:29 PM

**To:** Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>

**Cc:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>; Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; McKay, Stephanie <[SMcKay@trccompanies.com](mailto:SMcKay@trccompanies.com)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Greetings,

There was an issue found on the OP-PBRSUP that I didn't realize until recently. The facility has a PBR Registration 87554 that is missing from the OP-PBRSUP. Can you please make sure that this registration is still active and if so, please put it on the OP-PBRSUP.

Additionally, the PBR associated with that registration is 106.433. This PBR currently isn't on the permit or on the REQ1 page 89. If you could please submit an OP-REQ1 page 89 with that PBR listed to that form.

If you could please have this updated form back to me by **April 23, 2025** that would be great. I apologize for this inconvenience and error on my part. Please let me know if you have any questions.

Thanks,

***Ryan Glaze***

Operating Permits Section

Air Permits Division

Texas Commission on Environmental Quality

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**From:** Ryan Glaze

**Sent:** Tuesday, April 8, 2025 2:34 PM

**To:** Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>

**Cc:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>; Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; McKay, Stephanie <[SMcKay@trccompanies.com](mailto:SMcKay@trccompanies.com)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Greetings Alan,

Thank you for the updated OP-PBRSUP. If you could please go ahead and submit this updated document to STEERS to certify the document that would be great.

Thanks,

***Ryan Glaze***

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**From:** Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>

**Sent:** Tuesday, April 8, 2025 1:25 PM

**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Cc:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>; Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; McKay, Stephanie <[SMcKay@trccompanies.com](mailto:SMcKay@trccompanies.com)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Hello Ryan,

We appreciate your review. Please see the attached updated OP-PBRSUP.

Regards,

Alan "A.J." Ideris

Houston Office Practice Leader – Air Quality Consulting

Environmental, Health, Safety, and Sustainability Practice



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[LinkedIn](#) | [Instagram](#) | [TRCcompanies.com](http://TRCcompanies.com)

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**From:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Sent:** Tuesday, March 25, 2025 11:21 AM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>; Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Thank you Ryan.

-Jason

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**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Tuesday, March 25, 2025 11:04 AM  
**To:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Cc:** Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>; Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Greetings Jason,

That would be perfectly fine to do so. The new deadline will be documented as Tuesday, April 8<sup>th</sup>. Thank you for keeping me informed.

Thanks,

***Ryan Glaze***

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**From:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Sent:** Tuesday, March 25, 2025 11:01 AM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>; Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

I just received away messages from both AJ and Natasha with my reply to your e-mail. Looks like AJ is coming back from vacation March 31<sup>st</sup>. Can we extend the response to your requested addendums a week later to Tuesday, April 8<sup>th</sup>?

Please let me know if this date is suitable or if you would prefer it sooner.

Thank You,

Jason Nall

**Jason Nall, P.E.\***  
Manager - Global EHS  
Kohler Co.  
Cell: 920.226.8046  
Email: [jason.nall@kohler.com](mailto:jason.nall@kohler.com)  
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\*Professional Engineer in WI

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**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Tuesday, March 25, 2025 10:55 AM  
**To:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

Greetings Jason,

Thank you so much for the help.

Thanks,

***Ryan Glaze***  
Operating Permits Section  
Air Permits Division  
Texas Commission on Environmental Quality  
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**From:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>

**Sent:** Tuesday, March 25, 2025 10:54 AM

**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>; Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>

**Cc:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

I am forwarding your message to AJ Ideris (TRC). AJ will be in receipt and respond to Natasha's e-mails and questions regarding open projects while she is on maternity leave.

Thank You,

Jason Nall

**Jason Nall, P.E.\***

Manager - Global EHS

Kohler Co.

Cell: 920.226.8046

Email: [jason.nall@kohler.com](mailto:jason.nall@kohler.com)

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\*Professional Engineer in WI

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**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Sent:** Tuesday, March 25, 2025 10:26 AM

**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Greetings Natasha,

During the final stages of review, it was noticed that PBR 106.472 is missing from the OP-PBRSUP. If you could please add PBR 106.472 to Tables A & D to that form and send it to me by **Tuesday (April 1<sup>st</sup>)**. Once that is done if you could please submit the updated OP-PBRSUP to STEERS that would be great. If you have any questions about the permit, please let me know.

Thanks,

***Ryan Glaze***

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**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Sent:** Friday, February 7, 2025 11:57 AM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

Yes, that is correct.

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Friday, February 7, 2025 11:03 AM  
**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

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Greetings Natsha,

Just to confirm I noticed on the OP-PRBSUP and OP-REQ1 page 89 that PBRs 106.265, SE11, SE40, and SE86 are no longer listed on the document. Does this mean that those PBRs are not longer active at the site. I just need to know so I can remove them from the permit if that is the case.

Thanks,

Ryan

---

**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Sent:** Friday, February 7, 2025 10:47 AM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

Hello Ryan,

Please see attached the updated forms. Let me know if you need anything else.

Thanks,  
Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Monday, February 3, 2025 2:36 PM  
**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Greetings Natasha,

Just to follow up on the question that I wasn't fully sure on. Yes, Standard Exception must be listed on the PBRSUP. The reason is we must know where each PBRs is being used for each unit attached to that PBR. Just wanted to follow up to give you a more definitive answer after consulting with my mentor about it. If you have any questions, please let me know. I look forward to getting the documents from you on Thursday.

Thanks,

***Ryan Glaze***

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**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Sent:** Monday, February 3, 2025 2:04 PM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Hello Ryan,

Can we talk about these questions? I am a little confused since the PBRs do not match the forms.

Thanks,  
Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Thursday, January 30, 2025 8:38 AM  
**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Good morning Natasha,

I found something that needs to be addressed.

You have a PBR no. 106.264 listed on the OP-PBRSUP however it is not listed on the OP-REQ1 page 87. For 106.264 in needs to be added to the OP-REQ1 to show that it is being used on the permit. please put the PBR no. 106.264 on OP-REQ1 to make sure that it can be added to the permit. As of right now this PBR is not listed on the permit.

Additionally, other PBRs that have been issued are on the permit, however they're not on the OP-PBRSUP. If you could please add those PBRs (106.183, 106.265, 106.472, 3, 7, 11, 40, and 86) to the PBRSUP along with the units associated with those PBRs.

If you could please provide an update to this information to me by **Monday February 3, 2025** that would be great.

Thanks,

***Ryan Glaze***

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(512) 239-6212



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**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Sent:** Tuesday, January 28, 2025 1:11 PM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>  
**Subject:** Re: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant



No this renewal is not being incorporated since it is still pending issuance

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**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Tuesday, January 28, 2025 1:09:01 PM  
**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Greetings Natasha,

That is great to hear! One final thing, I noticed that there is a pending renewal application for NSR authorization number 6414. I wanted to know if this renewal is being incorporated in this minor revision.

Thanks,

Ryan Glaze

---

**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Sent:** Tuesday, January 28, 2025 1:06 PM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Hello Ryan,

We submitted the updated forms via STEERS. Let me know if you need anything else.

Thanks,  
Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Thursday, January 23, 2025 3:34 PM  
**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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**ALWAYS** hover over the link to preview the actual URL/site and confirm its legitimacy.

Hi Natasha,

Great! Thank you so much for the update. Some final things that I just wanted to make sure of before continuing with your permit. I noticed that there is a pending renewal application for NSR authorization number 6414. I wanted to know if this renewal is being incorporated in this minor revision. Additionally, if you could please submit the OP-UA66 and the final OP-CRO1 forms to STEERS if you have not done so already. If you could please have this done for me my **January 29, 2025** that would be great. If you have any questions for me, please let me know.

Thanks,

***Ryan Glaze***

Operating Permits Section

Air Permits Division

Texas Commission on Environmental Quality

P.O. Box 13087 MC 163

Austin, TX, 78711

(512) 239-6212



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---

**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Sent:** Thursday, January 23, 2025 9:51 AM

**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

We reviewed the updated draft permit and are good with the conditions.

Thanks,  
Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Sent:** Friday, January 17, 2025 4:49 PM

**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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**ALWAYS** hover over the link to preview the actual URL/site and confirm its legitimacy.

Greetings Natasha,

I have attached your updated Draft permit. If you have any questions going forward, please feel free to reach out to me.

Have a good weekend,

Ryan Glaze

---

**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Sent:** Friday, January 17, 2025 8:48 AM

**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

Please see attached.

Thanks,  
Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Sent:** Thursday, January 16, 2025 3:59 PM

**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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**ALWAYS** hover over the link to preview the actual URL/site and confirm its legitimacy.

Greetings Natasha,

It seems the OP-UA66 form was filled out incorrectly, the compliance option given (5810-C) should have had you go and fill out the CMS question of either yes or no. 95% reduction, affected source type, facility type, large parts, and operation type does not have to be answer.

I have attached the original OP-UA66 that was submitted with the initial application. The way that you have it filled out there is correct.

If you could do the same for units E080-084 and E110-113 that should do it. If you could please have these updates to me by **next Thursday (January 23, 2025)** that would be great. If you have any questions about what I am asking, please let me know.

Thanks,

***Ryan Glaze***

Operating Permits Section

Air Permits Division

Texas Commission on Environmental Quality

P.O. Box 13087 MC 163

Austin, TX, 78711

(512) 239-6212



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---

**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Sent:** Thursday, January 16, 2025 10:46 AM

**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

Please see attached the updated OP-UA66 form for your review.

Let me know if you need anything else from us.

Thanks,  
Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Sent:** Thursday, January 9, 2025 3:13 PM

**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Greetings,

I am following up based on our call yesterday afternoon. Based on your comments in the call, you plan to readd Unit IDs E110, E111, E112, and E113 to the permit since they are still in operation. Additionally, we discussed updated the high level applicability to MACT WWWW that remains in the permit for Unit IDs E80, E81, E82, E83, and E-84. Please submit an updated form OP-UA66, Table 1 for each of the units listed above (both the E110 series and E80 series units). Once I have received the updates, I will update the draft permit and send you the updated copy. If you could have these updates to me by **January 17, 2025** that would be great.

Please let me know if you have any questions

Thanks,

***Ryan Glaze***

Operating Permits Section

Air Permits Division

Texas Commission on Environmental Quality

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---

**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Sent:** Friday, December 20, 2024 3:36 PM

**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

We are open the morning of Monday, Jan. 6, or the afternoons of Jan. 7 and 8. Let me know if these slots work for you.

Thanks,  
Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Sent:** Friday, December 20, 2024 10:23 AM

**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

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**ALWAYS** hover over the link to preview the actual URL/site and confirm its legitimacy.

Greetings Natasha,

Yes, I'm able to give an extension till January 15, 2025. When it comes to setting up a teams meeting if you can tell me what days during week of January 6 that you are available to meet I should be able to set up a teams meeting for us during that time. Once I get your response, I should have the teams meetings information sent out by Monday of next week. If you have any other questions, please let me know.

Thanks,

Ryan Glaze

---

**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Sent:** Friday, December 20, 2024 9:33 AM

**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

We have reviewed the draft SOP and had a few questions which we would like to discuss with you over a Teams call. Due to the holidays, we are not available for the next 2 weeks and wanted to schedule a call for the week of January 6. Once we resolve our issues over the call, we can provide our responses.

As such, can you please provide us an extension to provide our responses till January 15, 2025?

Thanks,  
Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Sent:** Tuesday, December 17, 2024 9:30 AM

**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Cc:** Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>

**Subject:** [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

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**ALWAYS** hover over the link to preview the actual URL/site and confirm its legitimacy.

Greetings,

I have conducted a technical review of minor revision application for Kohler Co./Brownwood Plant. 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 on the working draft permit by Due Date **January 3, 2025**.

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,

***Ryan Glaze***

Operating Permits Section

Air Permits Division

Texas Commission on Environmental Quality

P.O. Box 13087 MC 163

Austin, TX, 78711

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

| Date       | Permit Number | Regulated Entity Number |
|------------|---------------|-------------------------|
| 04/08/2025 | O2711         | RN102560372             |

| Unit ID No. | Registration No. | PBR No.          | Registration Date |
|-------------|------------------|------------------|-------------------|
| BOOTH1a     | 177386           | 106.262          | 09/13/2024        |
| BOOTH1b     | 177386           | 106.262          | 09/13/2024        |
| BOOTH2a     | 177386           | 106.262          | 09/13/2024        |
| BOOTH2b     | 177386           | 106.262          | 09/13/2024        |
| ST1         | 177386           | 106.262          | 09/13/2024        |
| ST2         | 177386           | 106.262          | 09/13/2024        |
| ST3         | 177386           | 106.262          | 09/13/2024        |
| E272        | 122015           | 106.262          | 08/14/2014        |
| E123        | 103917           | 106.264          | 01/09/2001        |
| E109        | 103928           | 106.264, 106.183 | 02/13/2001        |
| E103        | 103931           | 106.264          | 02/19/1999        |
| BOILER      | 103998           | SE7              | 09/21/1993        |

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

| Date       | Permit Number | Regulated Entity Number |
|------------|---------------|-------------------------|
| 04/08/2025 | O2711         | RN102560372             |

| Unit ID No. | PBR No. | Version No./Date |
|-------------|---------|------------------|
| COMFORTHT   | SE3     | 07/15/1988       |
| E130        | 106.472 | 09/04/2000       |
| E131        | 106.472 | 09/04/2000       |
| E254        | 106.472 | 09/04/2000       |
|             |         |                  |
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**Permit By Rule Supplemental Table (Page 3)**  
**Table C: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for Insignificant Sources for the Application Area**  
**Texas Commission on Environmental Quality**

| Date       | Permit Number | Regulated Entity Number |
|------------|---------------|-------------------------|
| 04/08/2025 | O2711         | RN102560372             |

| PBR No. | Version No./Date |
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**Permit By Rule Supplemental Table (Page 4)**  
**Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area**  
**Texas Commission on Environmental Quality**

| Date       | Permit Number | Regulated Entity Number |
|------------|---------------|-------------------------|
| 04/08/2025 | O2711         | RN102560372             |

| Unit ID No. | PBR No. | Version No./Date Or Registration No. | Monitoring Requirement  |
|-------------|---------|--------------------------------------|---|
| BOOTH1a     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| BOOTH1b     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| BOOTH2a     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| BOOTH2b     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| ST1         | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| ST2         | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| ST3         | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| E272        | 106.262 | 122015                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| E123        | 106.264 | 103917                               | Maintain records of the emissions, production rate, throughput and/or capacity from the replacement facility. |

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

| Date       | Permit Number | Regulated Entity Number |
|------------|---------------|-------------------------|
| 04/08/2025 | O2711         | RN102560372             |

| Unit ID No. | PBR No.          | Version No./Date Or Registration No. | Monitoring Requirement  |
|-------------|------------------|--------------------------------------|---|
| E109        | 106.264, 106.183 | 103928                               | Maintain records of the emissions, production rate, throughput and/or capacity from the replacement facility.<br>Maintain records of fuel usage.  |
| E103        | 106.264          | 103931                               | Maintain records of the emissions, production rate, throughput and/or capacity from the replacement facility.   |
| BOILER      | SE7              | 103998                               | Maintain records of fuel usage.   |
| E130        | 106.472          | 09/04/2000                           | Maintain records of the amount of liquids loaded or unloaded at the site. Verify that there are no visible emissions from loading or unloading. Storage tank emissions should be less than applicable emission limit under 30 TAC §106.4(a)(1) - (3). Chemicals stored in the tank are limited to list of chemicals provided under 30 TAC §106.472 (1)-(9). |
| E131        | 106.472          | 09/04/2000                           | Maintain records of the amount of liquids loaded or unloaded at the site. Verify that there are no visible emissions from loading or unloading. Storage tank emissions should be less than applicable emission limit under 30 TAC §106.4(a)(1) - (3). Chemicals stored in the tank are limited to list of chemicals provided under 30 TAC §106.472 (1)-(9). |
| E254        | 106.472          | 09/04/2000                           | Maintain records of the amount of liquids loaded or unloaded at the site. Verify that there are no visible emissions from loading or unloading. Storage tank emissions should be less than applicable emission limit under 30 TAC §106.4(a)(1) - (3). Chemicals stored in the tank are limited to list of chemicals provided under 30 TAC §106.472 (1)-(9). |

**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. |
|------------|------------|----------------------|
| 02/05/2025 | O2711      | RN102560372          |

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 |
|-------------------|---------------|-------------------|---------------|-------------------|---------------|
| 6414              | 09/20/2024    |                   |               |                   |               |
|                   |               |                   |               |                   |               |
|                   |               |                   |               |                   |               |
|                   |               |                   |               |                   |               |

- ◆ **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 |
|---------|------------------|---------|------------------|---------|------------------|
| 106.262 | 11/01/2003       |         |                  |         |                  |
| 106.183 | 09/04/2000       |         |                  |         |                  |
| 106.264 | 09/04/2000       |         |                  |         |                  |
| 106.472 | 09/04/2000       |         |                  |         |                  |
| SE 3    | 07/15/1988       |         |                  |         |                  |
| SE 7    | 09/21/1993       |         |                  |         |                  |
|         |                  |         |                  |         |                  |
|         |                  |         |                  |         |                  |

- ◆ **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 |
|------------|---------------|------------|---------------|------------|---------------|
|            |               |            |               |            |               |
|            |               |            |               |            |               |
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**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 |
|------------|---------------|-------------------------|
| 02/05/2025 | O2711         | RN102560372             |

| Unit ID No. | Registration No. | PBR No.          | Registration Date |
|-------------|------------------|------------------|-------------------|
| BOOTH1a     | 177386           | 106.262          | 09/13/2024        |
| BOOTH1b     | 177386           | 106.262          | 09/13/2024        |
| BOOTH2a     | 177386           | 106.262          | 09/13/2024        |
| BOOTH2b     | 177386           | 106.262          | 09/13/2024        |
| ST1         | 177386           | 106.262          | 09/13/2024        |
| ST2         | 177386           | 106.262          | 09/13/2024        |
| ST3         | 177386           | 106.262          | 09/13/2024        |
| E272        | 122015           | 106.262          | 08/14/2014        |
| E123        | 103917           | 106.264          | 01/09/2001        |
| E109        | 103928           | 106.264, 106.183 | 02/13/2001        |
| E103        | 103931           | 106.264          | 02/19/1999        |
| BOILER      | 103998           | SE7              | 09/21/1993        |
|             |                  |                  |                   |

**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 |
|------------|---------------|-------------------------|
| 02/05/2025 | O2711         | RN102560372             |

| Unit ID No. | PBR No. | Version No./Date |
|-------------|---------|------------------|
| COMFORTHT   | SE3     | 07/15/1988       |
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**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 |
|------------|---------------|-------------------------|
| 02/05/2025 | O2711         | RN102560372             |

| PBR No. | Version No./Date |
|---------|------------------|
|         |                  |
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**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 |
|------------|---------------|-------------------------|
| 02/05/2025 | O2711         | RN102560372             |

| Unit ID No. | PBR No. | Version No./Date Or Registration No. | Monitoring Requirement  |
|-------------|---------|--------------------------------------|---|
| BOOTH1a     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| BOOTH1b     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| BOOTH2a     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| BOOTH2b     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| ST1         | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| ST2         | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| ST3         | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| E272        | 106.262 | 122015                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| E123        | 106.264 | 103917                               | Maintain records of the emissions, production rate, throughput and/or capacity from the replacement facility. |

**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 |
|------------|---------------|-------------------------|
| 02/05/2025 | O2711         | RN102560372             |

| Unit ID No. | PBR No.          | Version No./Date Or Registration No. | Monitoring Requirement   |
|-------------|------------------|--------------------------------------|--|
| E109        | 106.264, 106.183 | 103928                               | Maintain records of the emissions, production rate, throughput and/or capacity from the replacement facility.<br>Maintain records of fuel usage. |
| E103        | 106.264          | 103931                               | Maintain records of the emissions, production rate, throughput and/or capacity from the replacement facility.                                    |
| BOILER      | SE7              | 103998                               | Maintain records of fuel usage.  |
|             |                  |                                      |  |
|             |                  |                                      |  |
|             |                  |                                      |  |
|             |                  |                                      |  |
|             |                  |                                      |  |
|             |                  |                                      |  |

**Reinforced Plastic Composites Production****Form OP-UA66 (Page 1)****Federal Operating Permit Program****Table 1a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)****Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production  
Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 01/17/2025 | O-2711     | RN102560372          |

| Process ID No. | SOP Index No. | Production Process Type | Compliance Option | 95% Reduction | Affected Source Type | Facility Type | Large Parts | Operation Type | CMS | Add-On Control Device |
|----------------|---------------|-------------------------|-------------------|---------------|----------------------|---------------|-------------|----------------|-----|-----------------------|
| BOOTH1a        | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
| BOOTH1b        | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
| BOOTH2a        | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
| BOOTH2b        | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
| E080           | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
| E081           | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
| E082           | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
| E083           | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
| E084           | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
|                |               |                         |                   |               |                      |               |             |                |     |                       |

**Reinforced Plastic Composites Production**

**Form OP-UA66 (Page 1)**

**Federal Operating Permit Program**

**Table 1a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)**

**Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production**

**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 01/17/2025 | O-2711     | RN102560372          |

| Process ID No. | SOP Index No. | Production Process Type | Compliance Option | 95% Reduction | Affected Source Type | Facility Type | Large Parts | Operation Type | CMS | Add-On Control Device |
|----------------|---------------|-------------------------|-------------------|---------------|----------------------|---------------|-------------|----------------|-----|-----------------------|
| E110           | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
| E111           | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
| E112           | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
| E113           | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |

**Reinforced Plastic Composites Production****Form OP-UA66 (Page 1)****Federal Operating Permit Program****Table 1a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)****Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production  
Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 01/08/2025 | O-2711     | RN102560372          |

| Process ID No. | SOP Index No. | Production Process Type | Compliance Option | 95% Reduction | Affected Source Type | Facility Type | Large Parts | Operation Type | CMS | Add-On Control Device |
|----------------|---------------|-------------------------|-------------------|---------------|----------------------|---------------|-------------|----------------|-----|-----------------------|
| BOOTH1a        | 63WWWW        | WWWW                    | 5810-C            | 95%NO         | NEW                  | 100+          | LRG         | ONCRMEC        |     | NO                    |
| BOOTH1b        | 63WWWW        | WWWW                    | 5810-C            | 95%NO         | NEW                  | 100+          | LRG         | ONCRMEC        |     | NO                    |
| BOOTH2a        | 63WWWW        | WWWW                    | 5810-C            | 95%NO         | NEW                  | 100+          | LRG         | ONCRMEC        |     | NO                    |
| BOOTH2b        | 63WWWW        | WWWW                    | 5810-C            | 95%NO         | NEW                  | 100+          | LRG         | ONCRMEC        |     | NO                    |
| E080           | 63WWWW        | WWWW                    | 5810-C            | 95%NO         | EXIST                | 100+          |             | ONCRMEC        |     | NO                    |
| E081           | 63WWWW        | WWWW                    | 5810-C            | 95%NO         | EXIST                | 100+          |             | ONCRMEC        |     | NO                    |
| E082           | 63WWWW        | WWWW                    | 5810-C            | 95%NO         | EXIST                | 100+          |             | ONCRMEC        |     | NO                    |
| E083           | 63WWWW        | WWWW                    | 5810-C            | 95%NO         | EXIST                | 100+          |             | ONCRMEC        |     | NO                    |
| E084           | 63WWWW        | WWWW                    | 5810-C            | 95%NO         | EXIST                | 100+          |             | ONCRMEC        |     | NO                    |
|                |               |                         |                   |               |                      |               |             |                |     |                       |

**Reinforced Plastic Composites Production**

**Form OP-UA66 (Page 1)**

**Federal Operating Permit Program**

**Table 1a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)**

**Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production**

**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 01/08/2025 | O-2711     | RN102560372          |

| Process ID No. | SOP Index No. | Production Process Type | Compliance Option | 95% Reduction | Affected Source Type | Facility Type | Large Parts | Operation Type | CMS | Add-On Control Device |
|----------------|---------------|-------------------------|-------------------|---------------|----------------------|---------------|-------------|----------------|-----|-----------------------|
| E110           | 63WWWW        | WWWW                    | 5810-C            | 95%NO         | EXIST                | 100+          |             | ONCRMEC        |     | NO                    |
| E111           | 63WWWW        | WWWW                    | 5810-C            | 95%NO         | EXIST                | 100+          |             | ONCRMEC        |     | NO                    |
| E112           | 63WWWW        | WWWW                    | 5810-C            | 95%NO         | EXIST                | 100+          |             | ONCRMEC        |     | NO                    |
| E113           | 63WWWW        | WWWW                    | 5810-C            | 95%NO         | EXIST                | 100+          |             | ONCRMEC        |     | NO                    |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |

## Carolyn Thomas

---

**From:** Halageri, Natasha <NHalageri@trccompanies.com>  
**Sent:** Friday, November 15, 2024 1:21 PM  
**To:** Carolyn Thomas; Dale.Lepp@Kohler.com  
**Subject:** RE: [EXTERNAL] Kohler Co. Title V Permit 2711, Project 37391  
**Attachments:** OP-1.docx; Form OP-2\_v2.docx

Hi Carolyn,

Please see attached the requested forms.

Thanks,  
Natasha

---

**From:** Carolyn Thomas <Carolyn.Thomas@tceq.texas.gov>  
**Sent:** Friday, November 15, 2024 9:19 AM  
**To:** Dale.Lepp@Kohler.com; Halageri, Natasha <NHalageri@trccompanies.com>  
**Subject:** [EXTERNAL] Kohler Co. Title V Permit 2711, Project 37391

This is an **External** email. Do not click links or open attachments unless you validate the sender and know the content is safe.

**ALWAYS** hover over the link to preview the actual URL/site and confirm its legitimacy.

We have received your application for the above referenced facility and it is currently under review. The following item(s) are required before we can declare the application administratively complete:

- Please send an updated OP-2 Page 1- Update Company name to Kohler Co.
- Please provide an OP-1 to update the Technical Contact from Dustin Tarrant to Natasha Halageri per the COR.

Thank you,  
Carolyn Thomas  
Air Permits Initial Review Team  
Air Permits Division, MC 161  
Office of Air Texas Commission on Environmental Quality  
Phone: (512) 239-5127  
Fax: (512) 233-0973  
E-mail: [carolyn.thomas@tceq.texas.gov](mailto:carolyn.thomas@tceq.texas.gov)  
Web site: [www.tceq.texas.gov](http://www.tceq.texas.gov)  
Please consider whether it is necessary to print this e-mail.  
How are we doing? [www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)



## Carolyn Thomas

---

**From:** Carolyn Thomas  
**Sent:** Friday, November 15, 2024 9:19 AM  
**To:** Dale.Lepp@Kohler.com; nhalageri@trccompanies.com  
**Subject:** Kohler Co. Title V Permit 2711, Project 37391

We have received your application for the above referenced facility and it is currently under review. The following item(s) are required before we can declare the application administratively complete:

- Please send an updated OP-2 Page 1- Update Company name to Kohler Co.
- Please provide an OP-1 to update the Technical Contact from Dustin Tarrant to Natasha Halageri per the COR.

Thank you,  
Carolyn Thomas  
Air Permits Initial Review Team  
Air Permits Division, MC 161  
Office of Air Texas Commission on Environmental Quality  
Phone: (512) 239-5127  
Fax: (512) 233-0973  
E-mail: [carolyn.thomas@tceq.texas.gov](mailto:carolyn.thomas@tceq.texas.gov)  
Web site: [www.tceq.texas.gov](http://www.tceq.texas.gov)  
Please consider whether it is necessary to print this e-mail.  
How are we doing? [www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

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

|  |   |
|--|---|
| Date: <b>11/15/2024</b>  |   |
| Permit No.: <b>O2711</b>   |   |
| Regulated Entity No.: <b>RN102560372</b>   |   |
| Company Name: <b>Kohler Co.</b>  |   |
| For Submissions to EPA   |   |
| Has an electronic copy of this application been submitted (or is being submitted) to EPA? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span> |   |
| <b>I. Application Type</b>   |   |
| Indicate the type of application:  |   |
| <input type="checkbox"/> Renewal   |   |
| <input checked="" type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)   |   |
| <input type="checkbox"/> Significant Revision  |   |
| <input type="checkbox"/> Revision Requesting Prior Approval  |   |
| <input type="checkbox"/> Administrative Revision   |   |
| <input type="checkbox"/> Response to Reopening   |   |
| <b>II. Qualification Statement</b>   |   |
| For SOP Revisions Only   | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| For GOP Revisions Only   | <input type="checkbox"/> YES <input type="checkbox"/> NO            |

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

**III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)**

Indicate all pollutants for which the site is a major source based on the site's potential to emit:  
(Check the appropriate box[es].)

☒ VOC      ☐ NO<sub>x</sub>      ☐ SO<sub>2</sub>      ☐ PM<sub>10</sub>      ☐ CO      ☐ Pb      ☒ HAP

Other:

**IV. Reference Only Requirements (For reference only)**

Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)?      ☒ YES    ☐ NO    ☐ N/A

**V. Delinquent Fees and Penalties**

Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.

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

|                                   |
|-----------------------------------|
| Date: 11/15/2024                  |
| Permit No.: O2711                 |
| Regulated Entity No.: RN102560372 |
| Company Name: Kohler Co.          |

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

| Revision No. | Revision Code |          | Unit/Group | Process         | NSR<br>Authorization | Description of Change and Provisional<br>Terms and Conditions                   |
|--------------|---------------|----------|------------|-----------------|----------------------|---|
|              |               | New Unit | ID No.     | Applicable Form |                      |   |
| 1            | MS-A          | YES      | BOOTH1a    | OP-UA66         | 6414                 | Addition of spray coat booth 1 stack 1 subject to the requirements of MACT WWW. |
| 2            | MS-A          | YES      | BOOTH1b    | OP-UA66         | 6414                 | Addition of spray coat booth 1 stack 2 subject to the requirements of MACT WWW. |
| 3            | MS-A          | YES      | BOOTH2a    | OP-UA66         | 6414                 | Addition of spray coat booth 2 stack 1 subject to the requirements of MACT WWW. |
| 4            | MS-A          | YES      | BOOTH2b    | OP-UA66         | 6414                 | Addition of spray coat booth 2 stack 2 subject to the requirements of MACT WWW. |
| 5            | MS-A          | YES      | ST1        | OP-UA3          | 6414                 | Addition of resin storage tank.   |
| 6            | MS-A          | YES      | ST2        | OP-UA3          | 6414                 | Addition of resin storage tank.   |
| 7            | MS-A          | YES      | ST3        | OP-UA3          | 6414                 | Addition of resin storage tank.   |
| 8            | MS-A          | YES      | CLEANUP    | OP-SUMR         | 6414                 | Addition of cleanup operations.   |

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

|                                   |
|-----------------------------------|
| Date: 11/15/2024                  |
| Permit No.: O2711                 |
| Regulated Entity No.: RN102560372 |
| Company Name: Kohler Co.          |

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

| Revision No. | Revision Code |          | Unit/Group | Process         | NSR<br>Authorization | Description of Change and Provisional<br>Terms and Conditions  |
|--------------|---------------|----------|------------|-----------------|----------------------|--|
|              |               | New Unit | ID No.     | Applicable Form |                      |  |
| 9            | MS-A          | YES      | FUG        | OP-SUMR         | 6414                 | Addition of fugitive emissions from finishing, touching up and cleaning of fixtures before they are shipped. |
| 10           | MS-A          | NO       | E110       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 4.  |
| 11           | MS-A          | NO       | E111       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 3.  |
| 12           | MS-A          | NO       | E112       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 1.  |
| 13           | MS-A          | NO       | E113       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 2.  |
|              |               |          |            |                 |                      |  |
|              |               |          |            |                 |                      |  |
|              |               |          |            |                 |                      |  |
|              |               |          |            |                 |                      |  |

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

|  |   |
|--|---|
| Date: <b>11/06/2024</b>  |   |
| Permit No.: <b>O2711</b>   |   |
| Regulated Entity No.: <b>RN102560372</b>   |   |
| Company Name: <b>The Kohler Co.</b>  |   |
| For Submissions to EPA   |   |
| Has an electronic copy of this application been submitted (or is being submitted) to EPA? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span> |   |
| <b>I. Application Type</b>   |   |
| Indicate the type of application:  |   |
| <input type="checkbox"/> Renewal   |   |
| <input checked="" type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)   |   |
| <input type="checkbox"/> Significant Revision  |   |
| <input type="checkbox"/> Revision Requesting Prior Approval  |   |
| <input type="checkbox"/> Administrative Revision   |   |
| <input type="checkbox"/> Response to Reopening   |   |
| <b>II. Qualification Statement</b>   |   |
| For SOP Revisions Only   | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| For GOP Revisions Only   | <input type="checkbox"/> YES <input type="checkbox"/> NO            |

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

**III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)**

Indicate all pollutants for which the site is a major source based on the site's potential to emit:  
(Check the appropriate box[es].)

☒ VOC      ☐ NO<sub>x</sub>      ☐ SO<sub>2</sub>      ☐ PM<sub>10</sub>      ☐ CO      ☐ Pb      ☒ HAP

Other:

**IV. Reference Only Requirements (For reference only)**

Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)?      ☒ YES    ☐ NO    ☐ N/A

**V. Delinquent Fees and Penalties**

Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.

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

|                                   |
|-----------------------------------|
| Date: 11/06/2024                  |
| Permit No.: O2711                 |
| Regulated Entity No.: RN102560372 |
| Company Name: The Kohler Co.      |

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

| Revision No. | Revision Code |          | Unit/Group | Process         | NSR<br>Authorization | Description of Change and Provisional<br>Terms and Conditions                   |
|--------------|---------------|----------|------------|-----------------|----------------------|---|
|              |               | New Unit | ID No.     | Applicable Form |                      |   |
| 1            | MS-A          | YES      | BOOTH1a    | OP-UA66         | 6414                 | Addition of spray coat booth 1 stack 1 subject to the requirements of MACT WWW. |
| 2            | MS-A          | YES      | BOOTH1b    | OP-UA66         | 6414                 | Addition of spray coat booth 1 stack 2 subject to the requirements of MACT WWW. |
| 3            | MS-A          | YES      | BOOTH2a    | OP-UA66         | 6414                 | Addition of spray coat booth 2 stack 1 subject to the requirements of MACT WWW. |
| 4            | MS-A          | YES      | BOOTH2b    | OP-UA66         | 6414                 | Addition of spray coat booth 2 stack 2 subject to the requirements of MACT WWW. |
| 5            | MS-A          | YES      | ST1        | OP-UA3          | 6414                 | Addition of resin storage tank.   |
| 6            | MS-A          | YES      | ST2        | OP-UA3          | 6414                 | Addition of resin storage tank.   |
| 7            | MS-A          | YES      | ST3        | OP-UA3          | 6414                 | Addition of resin storage tank.   |
| 8            | MS-A          | YES      | CLEANUP    | OP-SUMR         | 6414                 | Addition of cleanup operations.   |



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

|                                   |
|-----------------------------------|
| Date: 11/06/2024                  |
| Permit No.: O2711                 |
| Regulated Entity No.: RN102560372 |
| Company Name: The Kohler Co.      |

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

| Revision No. | Revision Code |          | Unit/Group | Process         | NSR<br>Authorization | Description of Change and Provisional<br>Terms and Conditions  |
|--------------|---------------|----------|------------|-----------------|----------------------|--|
|              |               | New Unit | ID No.     | Applicable Form |                      |  |
| 9            | MS-A          | YES      | FUG        | OP-SUMR         | 6414                 | Addition of fugitive emissions from finishing, touching up and cleaning of fixtures before they are shipped. |
| 10           | MS-A          | NO       | E110       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 4.  |
| 11           | MS-A          | NO       | E111       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 3.  |
| 12           | MS-A          | NO       | E112       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 1.  |
| 13           | MS-A          | NO       | E113       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 2.  |
|              |               |          |            |                 |                      |  |
|              |               |          |            |                 |                      |  |
|              |               |          |            |                 |                      |  |
|              |               |          |            |                 |                      |  |

**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. |
|------------|------------|----------------------|
| 11/06/2024 | O2711      | RN102560372          |

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 |
|-------------------|---------------|-------------------|---------------|-------------------|---------------|
| 6414              | 09/20/2024    |                   |               |                   |               |
|                   |               |                   |               |                   |               |
|                   |               |                   |               |                   |               |
|                   |               |                   |               |                   |               |

◆ **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 |
|---------|------------------|---------|------------------|---------|------------------|
| 106.262 | 11/01/2003       | SE 86   | 05/12/1981       |         |                  |
| 106.183 | 09/04/2000       |         |                  |         |                  |
| 106.265 | 09/04/2000       |         |                  |         |                  |
| 106.472 | 09/04/2000       |         |                  |         |                  |
| SE 3    | 09/12/1989       |         |                  |         |                  |
| SE 7    | 09/12/1989       |         |                  |         |                  |
| SE 11   | 05/04/1994       |         |                  |         |                  |
| SE 40   | 05/05/1976       |         |                  |         |                  |

◆ **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 |
|------------|---------------|------------|---------------|------------|---------------|
|            |               |            |               |            |               |
|            |               |            |               |            |               |
|            |               |            |               |            |               |
|            |               |            |               |            |               |

## Carolyn Thomas

---

**From:** TVAPPS  
**Sent:** Tuesday, November 12, 2024 4:45 PM  
**To:** Carolyn Thomas  
**Subject:** FW: STEERS Title V Application Submittal (New Application)

Please Process.

Thank you,  
Richard Suniga  
APD/APIRT  
512.239.5325

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

From: [steers@tceq.texas.gov](mailto:steers@tceq.texas.gov) <[steers@tceq.texas.gov](mailto:steers@tceq.texas.gov)>  
Sent: Tuesday, November 12, 2024 12:30 PM  
To: RFCAIR3 <[RFCAIR3@tceq.texas.gov](mailto:RFCAIR3@tceq.texas.gov)>; TVAPPS <[tvapps@tceq.texas.gov](mailto:tvapps@tceq.texas.gov)>  
Subject: STEERS Title V Application Submittal (New Application)

The TV-E application has been successfully submitted by DALE LEPP. The submittal was received at 11/12/2024 12:29 PM.

The Reference number for this submittal is 702178

The confirmation number for this submittal is 579542.

The Area ID for this submittal is 2711.

The Project ID for this submittal is 37391.

The hash code for this submittal is 6BF9B443D2620C241372BF4F624A5A6793518555BBAD9F79512C5C23E4023FAF.

You may access the original application submittal and the notice of final action documents from the COR Viewer which is available at <https://ida.tceq.texas.gov/steersstaff/index.cfm?fuseaction=openadmin.submitlog&newsearch=yes>.

If you have any questions, please contact the STEERS Help Line at 512-239-6925 or by e-mail at [steers@tceq.texas.gov](mailto:steers@tceq.texas.gov).

**Reinforced Plastic Composites Production**

**Form OP-UA66 (Page 1)**

**Federal Operating Permit Program**

**Table 1a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)**

**Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production**

**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 11/06/2024 | O2711      | RN102560372          |

| Process ID No. | SOP Index No. | Production Process Type | Compliance Option | 95% Reduction | Affected Source Type | Facility Type | Large Parts | Operation Type | CMS | Add-On Control Device |
|----------------|---------------|-------------------------|-------------------|---------------|----------------------|---------------|-------------|----------------|-----|-----------------------|
| BOOTH1a        | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
| BOOTH1b        | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
| BOOTH2a        | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
| BOOTH2b        | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |

**Storage Tank/Vessel Attributes**  
**Form OP-UA3 (Page 3)**  
**Federal Operating Permit Program**  
**Table 3: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**  
**Subpart Kb: Standards of Performance for Volatile Organic Liquid Storage Vessels**  
**(Including Petroleum Liquid Storage Vessels)**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 11/06/2024 | O2711      | RN102560372          |

| Unit ID No. | SOP/GOP Index No. | Product Stored | Storage Capacity | WW Tank Control | Maximum TVP | Storage Vessel Description | AMEL ID No. | Guidepole | Reid Vapor Pressure | Control Device ID No. |
|-------------|-------------------|----------------|------------------|-----------------|-------------|----------------------------|-------------|-----------|---------------------|-----------------------|
| ST1         | 60Kb-1            | VOL            | 10K-             |                 |             |                            |             |           |                     |                       |
| ST2         | 60Kb-1            | VOL            | 10K-             |                 |             |                            |             |           |                     |                       |
| ST3         | 60Kb-1            | VOL            | 10K-             |                 |             |                            |             |           |                     |                       |
|             |                   |                |                  |                 |             |                            |             |           |                     |                       |
|             |                   |                |                  |                 |             |                            |             |           |                     |                       |
|             |                   |                |                  |                 |             |                            |             |           |                     |                       |
|             |                   |                |                  |                 |             |                            |             |           |                     |                       |
|             |                   |                |                  |                 |             |                            |             |           |                     |                       |
|             |                   |                |                  |                 |             |                            |             |           |                     |                       |
|             |                   |                |                  |                 |             |                            |             |           |                     |                       |

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

**Table 1**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 11/06/2024 | O2711      | RN102560372          |

| Unit/Process<br>AI | Unit/Process<br>Revision No. | Unit/Process ID No. | Unit/Process<br>Applicable<br>Form | Unit/Process Name/ Description | Unit/Process<br>CAM | Preconstruction<br>Authorizations<br>30 TAC Chapter<br>116/ 30 TAC<br>Chapter 106 | Preconstruction<br>Authorizations Title I |
|--------------------|------------------------------|---------------------|------------------------------------|--------------------------------|---------------------|---|---|
| A                  | 1                            | BOOTH1a             | OP-UA66                            | Spray Coat Booth 1 Stack 1     |                     | 6414  |   |
| A                  | 2                            | BOOTH1b             | OP-UA66                            | Spray Coat Booth 1 Stack 2     |                     | 6414  |   |
| A                  | 3                            | BOOTH2a             | OP-UA66                            | Spray Coat Booth 2 Stack 1     |                     | 6414  |   |
| A                  | 4                            | BOOTH2b             | OP-UA66                            | Spray Coat Booth 2 Stack 2     |                     | 6414  |   |
| A                  | 5                            | ST1                 | OP-UA3                             | Resin Storage Tank 1           |                     | 6414  |   |
| A                  | 6                            | ST2                 | OP-UA3                             | Resin Storage Tank 2           |                     | 6414  |   |
| A                  | 7                            | ST3                 | OP-UA3                             | Resin Storage Tank 3           |                     | 6414  |   |
| A                  | 8                            | CLEANUP             | OP-SUMR                            | Cleanup Operations             |                     | 6414  |   |
| A                  | 9                            | FUG                 | OP-SUMR                            | Fugitives                      |                     | 6414  |   |
| D                  | 10                           | E110                | OP-SUMR                            | ACR Chop 4 Booth               |                     | 6414  |   |

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

[Table 1](#)

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 11/06/2024 | O2711      | RN102560372          |

| Unit/Process<br>AI | Unit/Process<br>Revision No. | Unit/Process ID No. | Unit/Process<br>Applicable<br>Form | Unit/Process Name/ Description | Unit/Process<br>CAM | Preconstruction<br>Authorizations<br>30 TAC Chapter<br>116/ 30 TAC<br>Chapter 106 | Preconstruction<br>Authorizations Title I |
|--------------------|------------------------------|---------------------|------------------------------------|--------------------------------|---------------------|---|---|
| D                  | 11                           | E111                | OP-SUMR                            | ACR Chop 3 Booth               |                     | 6414  |   |
| D                  | 12                           | E112                | OP-SUMR                            | ACR Chop 1 Booth               |                     | 6414  |   |
| D                  | 13                           | E113                | OP-SUMR                            | ACR Chop 2 Booth               |                     | 6414  |   |
|                    |                              |                     |                                    |                                |                     |   |   |
|                    |                              |                     |                                    |                                |                     |   |   |
|                    |                              |                     |                                    |                                |                     |   |   |
|                    |                              |                     |                                    |                                |                     |   |   |
|                    |                              |                     |                                    |                                |                     |   |   |
|                    |                              |                     |                                    |                                |                     |   |   |
|                    |                              |                     |                                    |                                |                     |   |   |

**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 |
|------------|---------------|-------------------------|
| 11/06/2024 | O2711         | RN102560372             |

| Unit ID No. | Registration No. | PBR No. | Registration Date |
|-------------|------------------|---------|-------------------|
| BOOTH1a     | 177386           | 106.262 | 09/13/2024        |
| BOOTH1b     | 177386           | 106.262 | 09/13/2024        |
| BOOTH2a     | 177386           | 106.262 | 09/13/2024        |
| BOOTH2b     | 177386           | 106.262 | 09/13/2024        |
| ST1         | 177386           | 106.262 | 09/13/2024        |
| ST2         | 177386           | 106.262 | 09/13/2024        |
| ST3         | 177386           | 106.262 | 09/13/2024        |
| E272        | 122015           | 106.262 | 08/14/2014        |
| E123        | 103917           | 106.264 | 01/09/2001        |
| E109        | 103928           | 106.264 | 01/02/2001        |
| E103        | 103931           | 106.264 | 02/19/1999        |



**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 |
|------------|---------------|-------------------------|
| 11/06/2024 | O2711         | RN102560372             |

| Unit ID No. | PBR No. | Version No./Date |
|-------------|---------|------------------|
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |

**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 |
|------------|---------------|-------------------------|
| 11/06/2024 | O2711         | RN102560372             |

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

**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 |
|------------|---------------|-------------------------|
| 11/06/2024 | O2711         | RN102560372             |

| Unit ID No. | PBR No. | Version No./Date Or Registration No. | Monitoring Requirement  |
|-------------|---------|--------------------------------------|---|
| BOOTH1a     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| BOOTH1b     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| BOOTH2a     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| BOOTH2b     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| ST1         | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| ST2         | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| ST3         | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| E272        | 106.262 | 122015                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| E123        | 106.264 | 103917                               | Maintain records of the emissions, production rate, throughput and/or capacity from the replacement facility. |

**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 |
|------------|---------------|-------------------------|
| 11/06/2024 | O2711         | RN102560372             |

| Unit ID No. | PBR No. | Version No./Date Or Registration No. | Monitoring Requirement  |
|-------------|---------|--------------------------------------|---|
| E109        | 106.264 | 103928                               | Maintain records of the emissions, production rate, throughput and/or capacity from the replacement facility. |
| E103        | 106.264 | 103931                               | Maintain records of the emissions, production rate, throughput and/or capacity from the replacement facility. |
|             |         |                                      |   |
|             |         |                                      |   |
|             |         |                                      |   |
|             |         |                                      |   |
|             |         |                                      |   |
|             |         |                                      |   |
|             |         |                                      |   |

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

|  |   |
|--|---|
| Date: <b>11/06/2024</b>  |   |
| Permit No.: <b>O2711</b>   |   |
| Regulated Entity No.: <b>RN102560372</b>   |   |
| Company Name: <b>The Kohler Co.</b>  |   |
| For Submissions to EPA   |   |
| Has an electronic copy of this application been submitted (or is being submitted) to EPA? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span> |   |
| <b>I. Application Type</b>   |   |
| Indicate the type of application:  |   |
| <input type="checkbox"/> Renewal   |   |
| <input checked="" type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)   |   |
| <input type="checkbox"/> Significant Revision  |   |
| <input type="checkbox"/> Revision Requesting Prior Approval  |   |
| <input type="checkbox"/> Administrative Revision   |   |
| <input type="checkbox"/> Response to Reopening   |   |
| <b>II. Qualification Statement</b>   |   |
| For SOP Revisions Only   | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| For GOP Revisions Only   | <input type="checkbox"/> YES <input type="checkbox"/> NO            |

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

**III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)**

Indicate all pollutants for which the site is a major source based on the site's potential to emit:

*(Check the appropriate box[es].)*

☒ VOC      ☐ NO<sub>x</sub>      ☐ SO<sub>2</sub>      ☐ PM<sub>10</sub>      ☐ CO      ☐ Pb      ☒ HAP

Other:

**IV. Reference Only Requirements (For reference only)**

Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)?      ☒ YES    ☐ NO    ☐ N/A

**V. Delinquent Fees and Penalties**

Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.

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

|                                   |
|-----------------------------------|
| Date: 11/06/2024                  |
| Permit No.: O2711                 |
| Regulated Entity No.: RN102560372 |
| Company Name: The Kohler Co.      |

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

| Revision No. | Revision Code |          | Unit/Group | Process         | NSR<br>Authorization | Description of Change and Provisional<br>Terms and Conditions                   |
|--------------|---------------|----------|------------|-----------------|----------------------|---|
|              |               | New Unit | ID No.     | Applicable Form |                      |   |
| 1            | MS-A          | YES      | BOOTH1a    | OP-UA66         | 6414                 | Addition of spray coat booth 1 stack 1 subject to the requirements of MACT WWW. |
| 2            | MS-A          | YES      | BOOTH1b    | OP-UA66         | 6414                 | Addition of spray coat booth 1 stack 2 subject to the requirements of MACT WWW. |
| 3            | MS-A          | YES      | BOOTH2a    | OP-UA66         | 6414                 | Addition of spray coat booth 2 stack 1 subject to the requirements of MACT WWW. |
| 4            | MS-A          | YES      | BOOTH2b    | OP-UA66         | 6414                 | Addition of spray coat booth 2 stack 2 subject to the requirements of MACT WWW. |
| 5            | MS-A          | YES      | ST1        | OP-UA3          | 6414                 | Addition of resin storage tank.   |
| 6            | MS-A          | YES      | ST2        | OP-UA3          | 6414                 | Addition of resin storage tank.   |
| 7            | MS-A          | YES      | ST3        | OP-UA3          | 6414                 | Addition of resin storage tank.   |
| 8            | MS-A          | YES      | CLEANUP    | OP-SUMR         | 6414                 | Addition of cleanup operations.   |

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

|                                   |
|-----------------------------------|
| Date: 11/06/2024                  |
| Permit No.: O2711                 |
| Regulated Entity No.: RN102560372 |
| Company Name: The Kohler Co.      |

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

| Revision No. | Revision Code |          | Unit/Group | Process         | NSR<br>Authorization | Description of Change and Provisional<br>Terms and Conditions  |
|--------------|---------------|----------|------------|-----------------|----------------------|--|
|              |               | New Unit | ID No.     | Applicable Form |                      |  |
| 9            | MS-A          | YES      | FUG        | OP-SUMR         | 6414                 | Addition of fugitive emissions from finishing, touching up and cleaning of fixtures before they are shipped. |
| 10           | MS-A          | NO       | E110       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 4.  |
| 11           | MS-A          | NO       | E111       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 3.  |
| 12           | MS-A          | NO       | E112       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 1.  |
| 13           | MS-A          | NO       | E113       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 2.  |
|              |               |          |            |                 |                      |  |
|              |               |          |            |                 |                      |  |
|              |               |          |            |                 |                      |  |
|              |               |          |            |                 |                      |  |



## Texas Commission on Environmental Quality

Title V Existing

2711

### Site Information (Regulated Entity)

|   |   |
|---|---|
| What is the name of the permit area to be authorized? | KOHLER PLASTICS PLANT                   |
| Does the site have a physical address?                | Yes                                     |
| Physical Address                                      |   |
| Number and Street                                     | 4601 HIGHWAY 377 S                      |
| City  | BROWNWOOD                               |
| State   | TX                                      |
| ZIP   | 76801                                   |
| County  | BROWN                                   |
| Latitude (N) (##.#####)                               | 31.663888                               |
| Longitude (W) (-###.#####)                            | 98.996944                               |
| Primary SIC Code                                      | 3261                                    |
| Secondary SIC Code                                    |   |
| Primary NAICS Code                                    | 327110                                  |
| Secondary NAICS Code                                  |   |
| Regulated Entity Site Information                     |   |
| What is the Regulated Entity's Number (RN)?           | RN102560372                             |
| What is the name of the Regulated Entity (RE)?        | KOHLER BROWNWOOD VITREOUS PLANT         |
| Does the RE site have a physical address?             | Yes                                     |
| Physical Address                                      |   |
| Number and Street                                     | 4601 HIGHWAY 377 S                      |
| City  | BROWNWOOD                               |
| State   | TX                                      |
| ZIP   | 76801                                   |
| County  | BROWN                                   |
| Latitude (N) (##.#####)                               | 31.664722                               |
| Longitude (W) (-###.#####)                            | -98.9975                                |
| Facility NAICS Code                                   |   |
| What is the primary business of this entity?          | INDUSTRIAL CHEMICAL MANUFACTURING PLANT |

## Customer (Applicant) Information

|  |                |
|--|----------------|
| How is this applicant associated with this site? | Owner Operator |
| What is the applicant's Customer Number (CN)?    | CN600127039    |
| Type of Customer                                 | Corporation    |
| Full legal name of the applicant:                |                |
| Legal Name                                       | Kohler Co.     |
| Texas SOS Filing Number                          | 673606         |
| Federal Tax ID                                   | 390402810      |
| State Franchise Tax ID                           | 13904028100    |
| State Sales Tax ID                               |                |
| Local Tax ID                                     |                |
| DUNS Number                                      | 6073225        |
| Number of Employees                              | 501+           |
| Independently Owned and Operated?                | Yes            |

## Responsible Official Contact

|  |                         |
|--|-------------------------|
| Person TCEQ should contact for questions about this application: |                         |
| Organization Name  | KOHLER CO               |
| Prefix   | MR                      |
| First  | DALE                    |
| Middle   |                         |
| Last   | LEPP                    |
| Suffix   |                         |
| Credentials  |                         |
| Title  | PLASTICS SUPERINTENDENT |
| Enter new address or copy one from list:                         |                         |
| Mailing Address  |                         |
| Address Type   | Domestic                |
| Mailing Address (include Suite or Bldg. here, if applicable)     | 4601 HIGHWAY 377 S      |
| Routing (such as Mail Code, Dept., or Attn:)                     |                         |
| City   | BROWNWOOD               |
| State  | TX                      |
| ZIP  | 76801                   |

|                                |                      |
|--------------------------------|----------------------|
| Phone (###-###-####)           | 3252032186           |
| Extension                      |                      |
| Alternate Phone (###-###-####) |                      |
| Fax (###-###-####)             | 3256415834           |
| E-mail                         | Dale.Lepp@Kohler.com |

## Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

Organization Name

Prefix

First

Middle

Last

Suffix

Credentials

Title

Enter new address or copy one from list:

Mailing Address

Address Type

Mailing Address (include Suite or Bldg. here, if applicable)

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

City

State

ZIP

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

Extension

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

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

E-mail

New Contact

TRC Environmental Corp

MS

Natasha

Halageri

SENIOR PROJECT MANAGER

Domestic

14701 SAINT MARYS LN

Suite 500

HOUSTON

TX

77079

6013237775

nhalageri@trccompanies.com

## Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

31 Deg 39 Min 50 Sec

|   |                      |
|---|----------------------|
| 3) Permit Longitude Coordinate:   | 98 Deg 59 Min 49 Sec |
| 4) Is this submittal a new application or an update to an existing application?   | New Application      |
| 4.1. What type of permitting action are you applying for?   | Streamlined Revision |
| 4.1.1. Are there any permits that should be voided upon issuance of this permit application through permit conversion?    | No                   |
| 4.1.2. Are there any permits that should be voided upon issuance of this permit application through permit consolidation? | No                   |
| 5) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?                        | N/A                  |

## Title V Attachments Existing

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

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

[File Properties]

|           |   |
|-----------|---|
| File Name | <a href="/ePermitsExternal/faces/file?fileId=225040">OP-2.pdf</a> |
| Hash      | AFC0216800EAFE87309D4F5C1A8D315A00394C85087C6057B8048F327CFDDDC2  |
| 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=225041">OP-REQ1 (Page 89).pdf</a> |
| Hash      | 2EC14D242EB53105A07DBE3595F8DB00D924BCBEFB9D3414499DA18640D76DFC               |
| MIME-Type | application/pdf  |

#### Attach OP-REQ2 (Negative Applicable Requirement Determinations)

#### Attach OP-REQ3 (Applicable Requirements Summary)

#### Attach OP-PBRSUP (Permits by Rule Supplemental Table)

[File Properties]

|           |  |
|-----------|--|
| File Name | <a href="/ePermitsExternal/faces/file?fileId=225042">OP-PBRSUP.pdf</a> |
| Hash      | ECA27C0A2D5C52B8A989A84F9AB8340BCA38ACADC3EB7312CE9FD9C34E232DE7       |

|   |   |
|---|---|
| MIME-Type   | application/pdf   |
| Attach OP-SUMR (Individual Unit Summary for Revisions)                |   |
| [File Properties]   |   |
| File Name   | <a href=/ePermitsExternal/faces/file?fileId=225043>OP-SUMR.pdf</a>  |
| Hash  | DAA5225976AA4AB3EE60CD1FF079258502C82F70CD181C72B21B887C6FC79C28  |
| MIME-Type   | application/pdf   |
| Attach OP-MON (Monitoring Requirements)                               |   |
| Attach OP-UA (Unit Attribute) Forms                                   |   |
| [File Properties]   |   |
| File Name   | <a href=/ePermitsExternal/faces/file?fileId=225045>OP-UA3.pdf</a>   |
| Hash  | 1706F0CF3C3E3BC5A86614A6E19053FFAC6250FCC548D0446DB163CDE3379EDC  |
| MIME-Type   | application/pdf   |
| [File Properties]   |   |
| File Name   | <a href=/ePermitsExternal/faces/file?fileId=225044>OP-UA66.pdf</a>  |
| Hash  | 1AF288C53444BE9560285B87FA6E0074108E4C2624F120615B030FF5E20B2B87  |
| MIME-Type   | application/pdf   |
| If applicable, attach OP-AR1 (Acid Rain Permit Application)           |   |
| Attach OP-CRO2 (Change of Responsible Official Information)           |   |
| Attach OP-DEL (Delegation of Responsible Official)                    |   |
| Attach any other necessary information needed to complete the permit. |   |
| [File Properties]   |   |
| File Name   | <a href=/ePermitsExternal/faces/file?fileId=225047>Final 11-6-2024_Confidential_R571840.0000-001.pdf</a>    |
| Hash  | CB29FD01CF238B19E45ECEF4C30891793D9BED3050A212C826E4A67F8645466B  |
| MIME-Type   | application/pdf   |
| [File Properties]   |   |
| File Name   | <a href=/ePermitsExternal/faces/file?fileId=225046>Final 11-6-2024_NonConfidential_R571840.0000-001.pdf</a> |

|           |  |
|-----------|--|
| Hash      | 32AC34FB23094103F72CDBEFD9074633B2F665C83D6066B647B185D1CC8655F6 |
| 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 Dale Lepp, the owner of the STEERS account ER075091.
2. I have the authority to sign this data on behalf of the applicant named above.
3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
8. I am knowingly and intentionally signing Title V Existing 2711.
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: Dale Lepp OWNER OPERATOR

|                                      |  |
|--------------------------------------|--|
| Account Number:                      | ER075091   |
| Signature IP Address:                | 170.85.99.114  |
| Signature Date:                      | 2024-11-12   |
| Signature Hash:                      | 5409410418DB187A02E282CBE5333CE7D5E8FCF85BA41DDD666D8BA1E8ACB582 |
| Form Hash Code at time of Signature: | 6BF9B443D2620C241372BF4F624A5A6793518555BBAD9F79512C5C23E4023FAF |

## Submission

Reference Number:

The application reference number is 702178

Submitted by:

The application was submitted by ER075091/Dale Lepp

Submitted Timestamp:

The application was submitted on 2024-11-12 at 12:29:39 CST

Submitted From:

The application was submitted from IP address 170.85.99.114

Confirmation Number:

The confirmation number is 579542

Steers Version:

The STEERS version is 6.82

Permit Number:

The permit number is 2711

## Additional Information

---

Application Creator: This account was created by Natasha Halageri

---



14701 St. Mary's Ln., Ste. 500  
Houston, TX 77079

T 281.616.0100  
TRCcompanies.com

November 6, 2024

**Submitted Via STEERS**

Texas Commission on Environmental Quality (TCEQ)  
Air Permits Initial Review Team (APIRT)  
12100 Park 35 Circle, MC161  
Building C, Third Floor  
Austin, TX 78753

RE: Title V Streamlined Minor Revision Application  
The Kohler Co. – Brownwood Plant  
Brownwood, Brown County, Texas  
Permit No. O-2711  
Regulated Entity Number: RN102560372  
Customer Reference Number: CN600127039

Dear Sir or Madam:

TRC Environmental Corporation (TRC), on behalf of The Kohler Co. (Kohler), is hereby submitting the Title V Streamlined Minor Revision application for the Brownwood Plant located in Brown County, Texas. This submittal is to authorize the addition of three chopcoat spray booths, three trimming and grinding booths, three resin storage tanks, and associated equipment cleanup operations. Additionally, Kohler is also requesting the removal of existing acrylic (ACR) chop booths.

The enclosed streamlined minor revision application for Site Operating Permit No. O-2711 meets the requirements for a minor revision application per 30 TAC §122.215. The enclosed application includes the following TCEQ forms: OP-CRO1, OP-ACPS, OP-SUMR, OP-2, OP-REQ1 (Page 89), OP-PBRSUP, OP-UA3, and OP-UA66.

Should you have any questions regarding this application, please contact Mr. Jason Nall of Kohler by email at [jason.nall@kohler.com](mailto:jason.nall@kohler.com) or by phone at (920) 457-4441 Ext. 70195, or me via email at [NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com) or by phone at (601) 323-7775.

Sincerely,

TRC Environmental Corporation

Natasha Halageri  
Senior Project Manager

cc: U.S. Environmental Protection Agency, Air Permits Section (6PD-R), Region 6 (Electronic Submittal:  
[R6AirPermitsTX@epa.gov](mailto:R6AirPermitsTX@epa.gov))  
Air Section Manager, TCEQ Region 3, Abilene (STEERS)





# Title V Streamlined Minor Revision Application

Title V Permit Number O-2711

*The Kohler Co.  
Brownwood Plant  
Brown County, Texas*

November 2024

TRC Environmental Corporation | The Kohler Co.

Final 11/6/2024

P:\Kohler\571840.0000\_NSR Amendment\Title V\Final 11-6-2024\_R571840.0000-001.docx

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# Section 1

## Executive Summary

---

### 1.1 Introduction

Kohler Co. (Kohler) manufactures a variety of quality vitreous china and Fiber Reinforced Plastic (FRP) plumbing fixtures for sale and distribution worldwide at the manufacturing facility in Brownwood, Texas. The Brownwood Plant is located at 4601 Highway 377 South, in Brownwood, Brown County, Texas. The Texas Commission on Environmental Quality (TCEQ) Customer Number (CN) for Kohler is CN600127039 and the TCEQ Regulated Entity Number (RN) for the Brownwood facility is RN102560372. The manufacturing operations at the Brownwood Plant are authorized by TCEQ New Source Review (NSR) air quality permit nos. 6414 and 18136, various standard exemptions and permits-by-rule, and a Site Operating Permit (SOP) O-2711.

### 1.2 Purpose of the Application

The purpose of the enclosed streamlined minor revision application is to authorize the installation and operation of a new Acrylic Fixture Fiberglass Reinforced Plastic (FRP) line at the Brownwood facility. The project will comprise of three chopcoat spray booths, three trimming and grinding booths, three resin storage tanks, and associated equipment cleanup operations. Additionally, Kohler is also requesting the removal of four (4) existing acrylic (ACR) chop booths.

The enclosed streamlined minor revision application for Permit No. O-2711 meets the requirements for a revision per 30 TAC Chapter 122. The enclosed application includes the following TCEQ forms: OP-CRO1, OP-ACPS, OP-SUMR, OP-2, OP-REQ1 (Pages 87 and 88), OP-PBRSUP, OP-UA3, and OP-UA66.

## Section 2

# Process Description

---

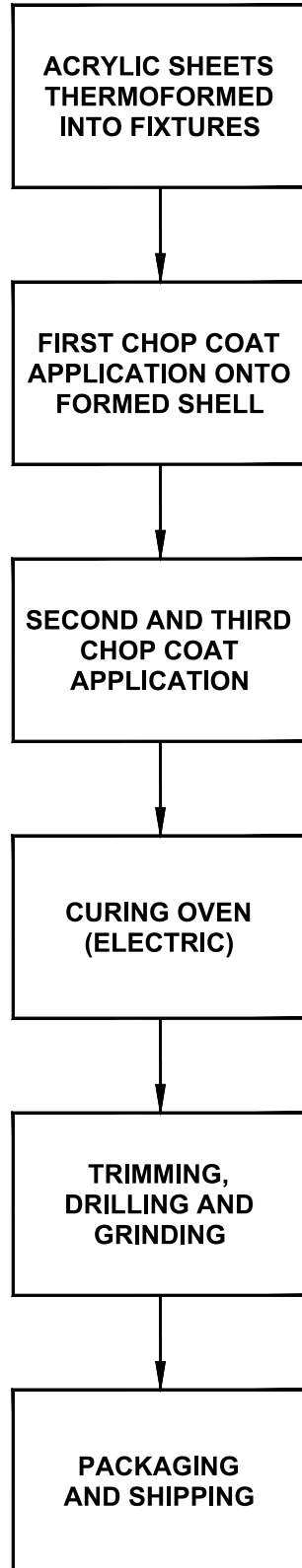
Kohler manufactures acrylic and gelcoat FRP bathroom fixtures (*e.g.*, tubs and shower receptors). Bulk quantities of resin and vinyl toluene additive delivered to the site in tank trucks are transferred to the vertical fixed roof storage tanks. An acrylic sheet is thermoformed into a fixture shape mold. Fiberglass and resin "chopcoat" are applied to the shell to provide reinforcement. For the spray-up operation, enough resin is transferred to the non-atomized spray gun pot. The resin and catalyst are mixed in the gun and the resulting mixture is applied to the molds. Fluid Impingement Technology (FIT) spray equipment is used to spray the chopcoat without atomization. As the material is applied to the mold, it is rolled out to compact the applied material to remove voids and ensure that each layer will tightly adhere to the previous layer. Once spraying is complete, the part is allowed to cure.


The cured parts move into one of three drill, trim and grind booths equipped with a particulate filter with 99 percent efficiency. Various cutting devices are used to remove casting flash, drill holes, and flatten various surfaces.

The resin application equipment and application tools are periodically cleaned since the resin will harden and render the equipment inoperable. Equipment cleaning operations are conducted with the booths or room ventilation systems operating such that cleaning emissions are captured as well.

A confidential process flow diagram is included as Figure 2-1A. A non-confidential process flow diagram is included as Figure 2-1B.

LAST EDIT: 08/02/2024 - FILE LOCATION: HOU C:\OF-TRC\DRAWING-CDrive\PP\Files\Kohler Co\Brownwood Plant\571840\ KOHLER-Brownwood Plant- Process Flow Diagrams.dwg



| CLIENT / PROJECT   |                          |             |
|--|--------------------------|-------------|
| KOHLER, CO.<br>Brownwood Plant<br>4601 Highway 377 South, Brownwood, TX 76801  |                          |             |
| TITLE  |                          |             |
| PROCESS FLOW DIAGRAM   |                          |             |
| DRAWN BY: O. Fonseca   | REQUEST BY: N. Halageri  | PROJECT NO. |
| DWG. DATE: August 2024   | PROJECT-MGR: N. Halageri | 571840      |
|    |                          | FIGURE      |
| 14701 ST. MARY'S LANE, STE. 500<br>HOUSTON, TEXAS 77079<br>PHONE: 281-616-0100<br><a href="http://TRCcompanies.com">TRCcompanies.com</a> |                          | 2-1B        |

## Section 3

# Site Location

---

The Brownwood Plant is located at 4601 Highway 377 South in Brownwood, Brown County, Texas.

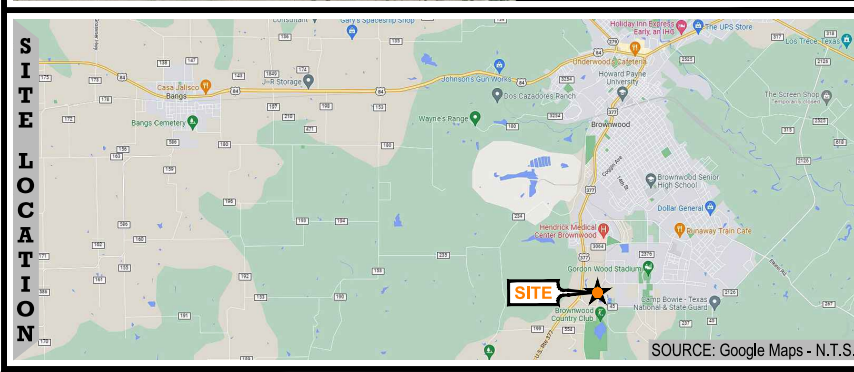
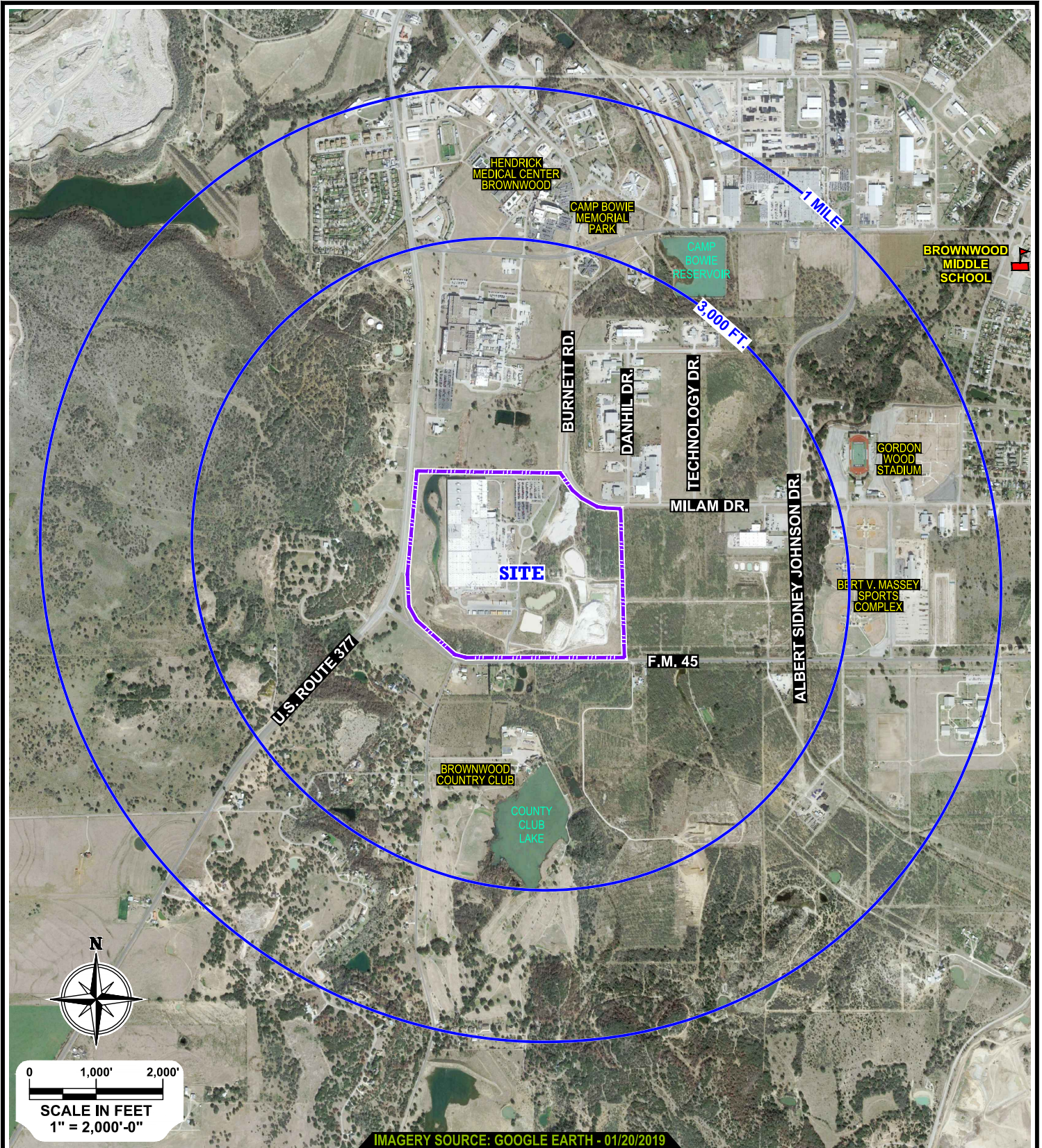
Latitude / Longitude: 31.664722/ -98.9975


An area map is included as Figure 3-1. The area map includes a true north arrow, an accurate scale, the entire plant property, the location of the property relative to prominent geographical features, industrial and non-industrial classification, and the location of the nearest schools relative to the Brownwood Plant. Figure 3-1 includes a circle of 3,000-ft radius and a circle of one-mile radius from the property boundary. The area map includes current aerial photography to depict the land use surrounding the facility.

The plot plan (**Confidential**), Figure 3-2A, is included in the confidential section of this application. Figure 3-2B illustrates the site orientation, the plant boundary, and all emission points at the Brownwood Plant.



LAST EDIT: 07/19/2022 - FILE LOCATION: HOU C:\OF-TRC\DRAWING-CDrive\PL-Files\Kohler Co\Brownwood Plant\ Fig 1-1 -KOHLER-BrownwoodPlant - Area Map.dwg



| CLIENT / PROJECT   |                             |  |
|--|-----------------------------|--|
| KOHLER CO.<br>Brownwood Plant<br>4601 Highway 377 South, Brownwood, TX 76801         |                             |  |
| TITLE  |                             |  |
| AREA MAP   |                             |  |
| DRAWN BY: O. Fonseca   | REQUEST BY: N. Halageri     | PROJECT NO. 483853.0000  |
| DWG. DATE: July 2022   | PROJECT-MGR: A. Rathinasamy | FIGURE 3-1   |
|  |                             | 14701 ST. MARY'S LANE, STE. 500<br>HOUSTON, TEXAS 77079<br>PHONE: 281-616-0100<br><a href="http://TRCcompanies.com">TRCcompanies.com</a> |





IMAGERY SOURCE: GOOGLE EARTH - 01/20/2019

## LEGEND



DOWNWASH STRUCTURE (BUILDING)



0 100' 200'  
SCALE IN FEET  
1" = 200'-0"

## CLIENT / PROJECT

**KOHLER CO.**  
**Brownwood Plant**  
**4601 Highway 377 South, Brownwood, TX 76801**

## TITLE

**PLOT PLAN**

DRAWN BY: O. Fonseca

REQUEST BY: N. Halageri

PROJECT NO.

DWG. DATE: November 2022

PROJECT-MGR: A. Ideris

**483853.0000**



14701 ST. MARY'S LANE, STE. 500  
HOUSTON, TEXAS 77079  
PHONE: 281-616-0100  
[TRCcompanies.com](http://TRCcompanies.com)

FIGURE

**3-2B**



# Appendix A

## Title V Application Forms

---

- Form OP-CRO1
- Form OP-SUMR
- Form OP-2
- Form OP-ACPS
- Form OP-REQ1 (Page 89)
- Form OP-PBRSUP
- Form OP-UA3
- Form OP-UA66

**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: <b>RN102560372</b>  |
| CN: <b>CN600127039</b>  |
| Account No.:  |
| Permit No.: <b>O2711</b>  |
| Project No.: <b>TBA</b>   |
| Area Name: <b>Brownwood Plant</b>   |
| Company Name: <b>The Kohler Co.</b>   |
| <b>II. Certification Type</b> <i>(Please mark appropriate box)</i>  |
| <input checked="" type="checkbox"/> <b>Responsible Official Representative</b> <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 checked="" type="checkbox"/> <b>Permit Revision, Renewal, or Reopening</b> |
| <input type="checkbox"/> GOP Initial Permit Application <input 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><b>Dale Lepp</b></u> certify that I am the <u><b>RO</b></u><br><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 _____ to _____<br><i>(Start Date)</i> <i>(End Date)</i>   |  |  |  |
| Specific Dates: <u><b>11/06/2024</b></u> _____<br><i>(Date 1)</i> <i>(Date 2)</i> <i>(Date 3)</i> <i>(Date 4)</i>   |  |  |  |
| _____<br><i>(Date 5)</i> <i>(Date 6)</i>  |  |  |  |
| Signature: _____ Signature Date: _____ Title:<br>_____  |  |  |  |
| Title: _____  |  |  |  |

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

[Table 1](#)

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 11/06/2024 | O2711      | RN102560372          |

| Unit/Process<br>AI | Unit/Process<br>Revision No. | Unit/Process ID No. | Unit/Process<br>Applicable<br>Form | Unit/Process Name/ Description | Unit/Process<br>CAM | Preconstruction<br>Authorizations<br>30 TAC Chapter<br>116/ 30 TAC<br>Chapter 106 | Preconstruction<br>Authorizations Title I |
|--------------------|------------------------------|---------------------|------------------------------------|--------------------------------|---------------------|---|---|
| A                  | 1                            | BOOTH1a             | OP-UA66                            | Spray Coat Booth 1 Stack 1     |                     | 6414  |   |
| A                  | 2                            | BOOTH1b             | OP-UA66                            | Spray Coat Booth 1 Stack 2     |                     | 6414  |   |
| A                  | 3                            | BOOTH2a             | OP-UA66                            | Spray Coat Booth 2 Stack 1     |                     | 6414  |   |
| A                  | 4                            | BOOTH2b             | OP-UA66                            | Spray Coat Booth 2 Stack 2     |                     | 6414  |   |
| A                  | 5                            | ST1                 | OP-UA3                             | Resin Storage Tank 1           |                     | 6414  |   |
| A                  | 6                            | ST2                 | OP-UA3                             | Resin Storage Tank 2           |                     | 6414  |   |
| A                  | 7                            | ST3                 | OP-UA3                             | Resin Storage Tank 3           |                     | 6414  |   |
| A                  | 8                            | CLEANUP             | OP-SUMR                            | Cleanup Operations             |                     | 6414  |   |
| A                  | 9                            | FUG                 | OP-SUMR                            | Fugitives                      |                     | 6414  |   |
| D                  | 10                           | E110                | OP-SUMR                            | ACR Chop 4 Booth               |                     | 6414  |   |

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

**Table 1**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 11/06/2024 | O2711      | RN102560372          |

| Unit/Process<br>AI | Unit/Process<br>Revision No. | Unit/Process ID No. | Unit/Process<br>Applicable<br>Form | Unit/Process Name/ Description | Unit/Process<br>CAM | Preconstruction<br>Authorizations<br>30 TAC Chapter<br>116/ 30 TAC<br>Chapter 106 | Preconstruction<br>Authorizations Title I |
|--------------------|------------------------------|---------------------|------------------------------------|--------------------------------|---------------------|---|---|
| D                  | 11                           | E111                | OP-SUMR                            | ACR Chop 3 Booth               |                     | 6414  |   |
| D                  | 12                           | E112                | OP-SUMR                            | ACR Chop 1 Booth               |                     | 6414  |   |
| D                  | 13                           | E113                | OP-SUMR                            | ACR Chop 2 Booth               |                     | 6414  |   |
|                    |                              |                     |                                    |                                |                     |   |   |
|                    |                              |                     |                                    |                                |                     |   |   |
|                    |                              |                     |                                    |                                |                     |   |   |
|                    |                              |                     |                                    |                                |                     |   |   |
|                    |                              |                     |                                    |                                |                     |   |   |
|                    |                              |                     |                                    |                                |                     |   |   |
|                    |                              |                     |                                    |                                |                     |   |   |

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

|  |   |
|--|---|
| Date: <b>11/06/2024</b>  |   |
| Permit No.: <b>O2711</b>   |   |
| Regulated Entity No.: <b>RN102560372</b>   |   |
| Company Name: <b>The Kohler Co.</b>  |   |
| For Submissions to EPA   |   |
| Has an electronic copy of this application been submitted (or is being submitted) to EPA? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span> |   |
| <b>I. Application Type</b>   |   |
| Indicate the type of application:  |   |
| <input type="checkbox"/> Renewal   |   |
| <input checked="" type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)   |   |
| <input type="checkbox"/> Significant Revision  |   |
| <input type="checkbox"/> Revision Requesting Prior Approval  |   |
| <input type="checkbox"/> Administrative Revision   |   |
| <input type="checkbox"/> Response to Reopening   |   |
| <b>II. Qualification Statement</b>   |   |
| For SOP Revisions Only   | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| For GOP Revisions Only   | <input type="checkbox"/> YES <input type="checkbox"/> NO            |

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

|  |  |  |   |                             |                             |  |
|--|--|--|---|-----------------------------|-----------------------------|--|
| <b>III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)</b>  |  |  |   |                             |                             |  |
| Indicate all pollutants for which the site is a major source based on the site's potential to emit:<br><i>(Check the appropriate box[es].)</i>   |  |  |   |                             |                             |  |
| <input checked="" type="checkbox"/> VOC  | <input type="checkbox"/> NO <sub>x</sub> | <input type="checkbox"/> SO <sub>2</sub> | <input type="checkbox"/> PM <sub>10</sub> | <input type="checkbox"/> CO | <input type="checkbox"/> Pb | <input checked="" type="checkbox"/> HAP  |
| Other:   |  |  |   |                             |                             |  |
| <b>IV. Reference Only Requirements (For reference only)</b>  |  |  |   |                             |                             |  |
| Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)?  |  |  |   |                             |                             | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A |
| <b>V. Delinquent Fees and Penalties</b>  |  |  |   |                             |                             |  |
| Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol. |  |  |   |                             |                             |  |

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

|                                   |
|-----------------------------------|
| Date: 11/06/2024                  |
| Permit No.: O2711                 |
| Regulated Entity No.: RN102560372 |
| Company Name: The Kohler Co.      |

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

| Revision No. | Revision Code |          | Unit/Group | Process         | NSR<br>Authorization | Description of Change and Provisional<br>Terms and Conditions                   |
|--------------|---------------|----------|------------|-----------------|----------------------|---|
|              |               | New Unit | ID No.     | Applicable Form |                      |   |
| 1            | MS-A          | YES      | BOOTH1a    | OP-UA66         | 6414                 | Addition of spray coat booth 1 stack 1 subject to the requirements of MACT WWW. |
| 2            | MS-A          | YES      | BOOTH1b    | OP-UA66         | 6414                 | Addition of spray coat booth 1 stack 2 subject to the requirements of MACT WWW. |
| 3            | MS-A          | YES      | BOOTH2a    | OP-UA66         | 6414                 | Addition of spray coat booth 2 stack 1 subject to the requirements of MACT WWW. |
| 4            | MS-A          | YES      | BOOTH2b    | OP-UA66         | 6414                 | Addition of spray coat booth 2 stack 2 subject to the requirements of MACT WWW. |
| 5            | MS-A          | YES      | ST1        | OP-UA3          | 6414                 | Addition of resin storage tank.   |
| 6            | MS-A          | YES      | ST2        | OP-UA3          | 6414                 | Addition of resin storage tank.   |
| 7            | MS-A          | YES      | ST3        | OP-UA3          | 6414                 | Addition of resin storage tank.   |
| 8            | MS-A          | YES      | CLEANUP    | OP-SUMR         | 6414                 | Addition of cleanup operations.   |



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

|                                   |
|-----------------------------------|
| Date: 11/06/2024                  |
| Permit No.: O2711                 |
| Regulated Entity No.: RN102560372 |
| Company Name: The Kohler Co.      |

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

| Revision No. | Revision Code |          | Unit/Group | Process         | NSR<br>Authorization | Description of Change and Provisional<br>Terms and Conditions  |
|--------------|---------------|----------|------------|-----------------|----------------------|--|
|              |               | New Unit | ID No.     | Applicable Form |                      |  |
| 9            | MS-A          | YES      | FUG        | OP-SUMR         | 6414                 | Addition of fugitive emissions from finishing, touching up and cleaning of fixtures before they are shipped. |
| 10           | MS-A          | NO       | E110       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 4.  |
| 11           | MS-A          | NO       | E111       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 3.  |
| 12           | MS-A          | NO       | E112       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 1.  |
| 13           | MS-A          | NO       | E113       | OP-SUMR         | 6414                 | Remove ACR chop coat booth 2.  |
|              |               |          |            |                 |                      |  |
|              |               |          |            |                 |                      |  |
|              |               |          |            |                 |                      |  |
|              |               |          |            |                 |                      |  |

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

|                                     |  |                                   |
|-------------------------------------|--|-----------------------------------|
| <b>Date:</b> 11/06/2024             | <b>Regulated Entity No.:</b> RN102560372 | <b>Permit No.:</b> O2711          |
| <b>Company Name:</b> The Kohler Co. |  | <b>Area Name:</b> Brownwood Plant |

- 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*</b><br>(Indicate response by entering an "X" in the appropriate column)   |   |
| <b>1.</b> With the exception of those emission units listed in the Compliance Schedule section of this form (Part 2, below), and based, at minimum, on the compliance method specified in the associated applicable requirements, are all emission units addressed in this application in compliance with all their respective applicable requirements as identified in this application?   | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| <b>2.</b> Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?   | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| <b>3.</b> If the response to Item B.2, above, is "Yes," indicate the total number of Part 2 attachments included in this submittal. <i>(For reference only)</i>   |   |
| <p><small>* For Site Operating Permits (SOPs), the complete application should be consulted for applicable requirements and their corresponding emission units when assessing compliance status.<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.</small></p> <p><small>Compliance should be assessed based, at a minimum, on the required monitoring, testing, record keeping, and/or reporting requirements, as appropriate, associated with the applicable requirement in question.</small></p> |   |

**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. |
|------------|------------|----------------------|
| 11/06/2024 | O2711      | RN102560372          |

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 |
|-------------------|---------------|-------------------|---------------|-------------------|---------------|
| 6414              | 09/20/2024    |                   |               |                   |               |
|                   |               |                   |               |                   |               |
|                   |               |                   |               |                   |               |
|                   |               |                   |               |                   |               |

- ◆ **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 |
|---------|------------------|---------|------------------|---------|------------------|
| 106.262 | 11/01/2003       | SE 86   | 05/12/1981       |         |                  |
| 106.183 | 09/04/2000       |         |                  |         |                  |
| 106.265 | 09/04/2000       |         |                  |         |                  |
| 106.472 | 09/04/2000       |         |                  |         |                  |
| SE 3    | 09/12/1989       |         |                  |         |                  |
| SE 7    | 09/12/1989       |         |                  |         |                  |
| SE 11   | 05/04/1994       |         |                  |         |                  |
| SE 40   | 05/05/1976       |         |                  |         |                  |

- ◆ **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 |
|------------|---------------|------------|---------------|------------|---------------|
|            |               |            |               |            |               |
|            |               |            |               |            |               |
|            |               |            |               |            |               |
|            |               |            |               |            |               |

**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 |
|------------|---------------|-------------------------|
| 11/06/2024 | O2711         | RN102560372             |

| Unit ID No. | Registration No. | PBR No. | Registration Date |
|-------------|------------------|---------|-------------------|
| BOOTH1a     | 177386           | 106.262 | 09/13/2024        |
| BOOTH1b     | 177386           | 106.262 | 09/13/2024        |
| BOOTH2a     | 177386           | 106.262 | 09/13/2024        |
| BOOTH2b     | 177386           | 106.262 | 09/13/2024        |
| ST1         | 177386           | 106.262 | 09/13/2024        |
| ST2         | 177386           | 106.262 | 09/13/2024        |
| ST3         | 177386           | 106.262 | 09/13/2024        |
| E272        | 122015           | 106.262 | 08/14/2014        |
| E123        | 103917           | 106.264 | 01/09/2001        |
| E109        | 103928           | 106.264 | 01/02/2001        |
| E103        | 103931           | 106.264 | 02/19/1999        |

**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 |
|------------|---------------|-------------------------|
| 11/06/2024 | O2711         | RN102560372             |

| Unit ID No. | PBR No. | Version No./Date |
|-------------|---------|------------------|
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |

**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 |
|------------|---------------|-------------------------|
| 11/06/2024 | O2711         | RN102560372             |

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

**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 |
|------------|---------------|-------------------------|
| 11/06/2024 | O2711         | RN102560372             |

| Unit ID No. | PBR No. | Version No./Date Or Registration No. | Monitoring Requirement  |
|-------------|---------|--------------------------------------|---|
| BOOTH1a     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| BOOTH1b     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| BOOTH2a     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| BOOTH2b     | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| ST1         | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| ST2         | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| ST3         | 106.262 | 177386                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| E272        | 106.262 | 122015                               | Verify that visible emissions from this source do not exceed 5% opacity in any six-minute period.             |
| E123        | 106.264 | 103917                               | Maintain records of the emissions, production rate, throughput and/or capacity from the replacement facility. |

**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 |
|------------|---------------|-------------------------|
| 11/06/2024 | O2711         | RN102560372             |

| Unit ID No. | PBR No. | Version No./Date Or Registration No. | Monitoring Requirement  |
|-------------|---------|--------------------------------------|---|
| E109        | 106.264 | 103928                               | Maintain records of the emissions, production rate, throughput and/or capacity from the replacement facility. |
| E103        | 106.264 | 103931                               | Maintain records of the emissions, production rate, throughput and/or capacity from the replacement facility. |
|             |         |                                      |   |
|             |         |                                      |   |
|             |         |                                      |   |
|             |         |                                      |   |
|             |         |                                      |   |
|             |         |                                      |   |
|             |         |                                      |   |



**Storage Tank/Vessel Attributes**  
**Form OP-UA3 (Page 3)**  
**Federal Operating Permit Program**  
**Table 3: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**  
**Subpart Kb: Standards of Performance for Volatile Organic Liquid Storage Vessels**  
**(Including Petroleum Liquid Storage Vessels)**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 11/06/2024 | O2711      | RN102560372          |

| Unit ID No. | SOP/GOP Index No. | Product Stored | Storage Capacity | WW Tank Control | Maximum TVP | Storage Vessel Description | AMEL ID No. | Guidepole | Reid Vapor Pressure | Control Device ID No. |
|-------------|-------------------|----------------|------------------|-----------------|-------------|----------------------------|-------------|-----------|---------------------|-----------------------|
| ST1         | 60Kb-1            | VOL            | 10K-             |                 |             |                            |             |           |                     |                       |
| ST2         | 60Kb-1            | VOL            | 10K-             |                 |             |                            |             |           |                     |                       |
| ST3         | 60Kb-1            | VOL            | 10K-             |                 |             |                            |             |           |                     |                       |
|             |                   |                |                  |                 |             |                            |             |           |                     |                       |
|             |                   |                |                  |                 |             |                            |             |           |                     |                       |
|             |                   |                |                  |                 |             |                            |             |           |                     |                       |
|             |                   |                |                  |                 |             |                            |             |           |                     |                       |
|             |                   |                |                  |                 |             |                            |             |           |                     |                       |
|             |                   |                |                  |                 |             |                            |             |           |                     |                       |
|             |                   |                |                  |                 |             |                            |             |           |                     |                       |

**Reinforced Plastic Composites Production****Form OP-UA66 (Page 1)****Federal Operating Permit Program****Table 1a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)****Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production****Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 11/06/2024 | O2711      | RN102560372          |

| Process ID No. | SOP Index No. | Production Process Type | Compliance Option | 95% Reduction | Affected Source Type | Facility Type | Large Parts | Operation Type | CMS | Add-On Control Device |
|----------------|---------------|-------------------------|-------------------|---------------|----------------------|---------------|-------------|----------------|-----|-----------------------|
| BOOTH1a        | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
| BOOTH1b        | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
| BOOTH2a        | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
| BOOTH2b        | 63WWWW        | WWWW                    | 5810-C            |               |                      |               |             |                | YES | NO                    |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |
|                |               |                         |                   |               |                      |               |             |                |     |                       |

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

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

|  |
|--|
| <b>I. Company Identifying Information</b>  |
| A. Company Name: <b>Kohler Co.</b>   |
| B. Customer Reference Number (CN): <b>CN600127039</b>  |
| C. Submittal Date (mm/dd/yyyy): <b>11/15/2024</b>  |
| <b>II. Site Information</b>  |
| A. Site Name: <b>Brownwood Plant</b>   |
| B. Regulated Entity Reference Number (RN): <b>RN102560372</b>  |
| C. Indicate affected state(s) required to review permit application: <i>(Check the appropriate box[es].)</i>   |
| <input type="checkbox"/> AR <input type="checkbox"/> CO <input type="checkbox"/> KS <input type="checkbox"/> LA <input type="checkbox"/> NM <input type="checkbox"/> OK <input checked="" type="checkbox"/> N/A  |
| D. Indicate all pollutants for which the site is a major source based on the site's potential to emit:<br><i>(Check the appropriate box[es].)</i>  |
| <input checked="" type="checkbox"/> VOC <input type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> CO <input type="checkbox"/> Pb <input checked="" type="checkbox"/> HAPS |
| Other:   |
| E. Is the site a non-major source subject to the Federal Operating Permit Program? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>  |
| F. Is the site within a local program area jurisdiction? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>  |
| G. Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>   |
| H. Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:   |
| <b>III. Permit Type</b>  |
| A. Type of Permit Requested: <i>(Select only one response)</i>   |
| <input checked="" type="checkbox"/> Site Operating Permit (SOP) <input type="checkbox"/> Temporary Operating Permit (TOP) <input type="checkbox"/> General Operating Permit (GOP)  |

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

|  |
|--|
| <b>IV. Initial Application Information</b> <i>(Complete for Initial Issuance Applications Only.)</i>   |
| <b>A.</b> Is this submittal an abbreviated or a full application? <span style="float: right;"><input type="checkbox"/> Abbreviated <input type="checkbox"/> Full</span>  |
| <b>B.</b> If this is a full application, is the submittal a follow-up to an abbreviated application? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>   |
| <b>C.</b> If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>   |
| <b>D.</b> Has an electronic copy of this application been submitted (or is being submitted) to EPA? (Refer to the form instructions for additional information.) <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span> |
| <b>E.</b> Has the required Public Involvement Plan been included with this application? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>  |
| <b>V. Confidential Information</b>   |
| <b>A.</b> Is confidential information submitted in conjunction with this application? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span>   |
| <b>VI. Responsible Official (RO) Identifying Information</b>   |
| RO Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)   |
| RO Full Name: <b>Dale Lepp</b>   |
| RO Title: <b>Plastics Superintendent</b>   |
| Employer Name: <b>Kohler Co.</b>   |
| Mailing Address: <b>4601 Highway 377 South</b>   |
| City: <b>Brownwood</b>   |
| State: <b>Texas</b>  |
| ZIP Code: <b>76801</b>   |
| Territory:   |
| Country: <b>USA</b>  |
| Foreign Postal Code:   |
| Internal Mail Code:  |
| Telephone No.: <b>325-203-2186</b>   |
| Fax No.:   |
| Email: <a href="mailto:Dale.Lepp@Kohler.com">Dale.Lepp@Kohler.com</a>  |

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

|   |
|---|
| <b>VII. Technical Contact Identifying Information</b> <i>(Complete if different from RO.)</i>   |
| Technical Contact Name Prefix: ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input checked="" type="checkbox"/> Ms. <input type="checkbox"/> Dr.)   |
| Technical Contact Full Name: <b>Natasha Halageri</b>  |
| Technical Contact Title: <b>Senior Project Manager</b>  |
| Employer Name: <b>TRC Environmental Corp.</b>   |
| Mailing Address: <b>230 W Monroe Street Suite 630</b>   |
| City: <b>Chicago</b>  |
| State: <b>Illinois</b>  |
| ZIP Code: <b>60606</b>  |
| Territory:  |
| Country: <b>USA</b>   |
| Foreign Postal Code:  |
| Internal Mail Code:   |
| Telephone No.: <b>601-323-7775</b>  |
| Fax No.:  |
| Email: <a href="mailto:NHalageri@trccompanies.com">NHalageri@trccompanies.com</a>   |
| <b>VIII. Reference Only Requirements</b> <i>(For reference only.)</i>   |
| <b>A.</b> State Senator: <b>Phil King, District 10</b>  |
| <b>B.</b> State Representative: <b>David Speller, District 68</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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</span> |
| <b>D.</b> Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>   |
| <b>E.</b> Indicate the alternate language(s) in which public notice is required:  |

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

|   |
|---|
| <b>IX. Off-Site Permit Request</b><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: <b>Brownwood Plant</b>  |
| B. Physical Address: <b>4601 Highway 377 South</b>  |
| City: <b>Brownwood</b>  |
| State: <b>Texas</b>   |
| ZIP Code: <b>76801</b>  |
| 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): <b>31.664722</b>  |
| <b>H.</b> Longitude (nearest second): <b>-98.9975</b>  |
| <b>I.</b> Are there any emission units that were not in compliance with the applicable requirements identified in the application at the time of application submittal? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span> |
| <b>J.</b> Indicate the estimated number of emission units in the application area: <b>10</b>   |
| <b>K.</b> Are there any emission units in the application area subject to the Acid Rain Program? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>  |
| <b>L.</b> Affected Source Plant Code (or ORIS/Facility Code):  |
| <b>XI. Public Notice</b><br>(Complete this section for SOP Applications and Acid Rain Permit Applications only.)   |
| <b>A.</b> Name of a public place to view application and draft permit: <b>Brownwood Public Library</b>   |
| <b>B.</b> Physical Address: <b>600 Carnegie Street</b>   |
| City: <b>Brownwood</b>   |
| ZIP Code: <b>76801</b>   |
| <b>C.</b> Contact Person (Someone who will answer questions from the public during the public notice period):  |
| Contact Name Prefix: ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input checked="" type="checkbox"/> Ms. <input type="checkbox"/> Dr.):   |
| Contact Person Full Name: <b>Randi Schmidling</b>  |
| Contact Mailing Address: <b>4601 Highway 377 South</b>   |
| City: <b>Brownwood</b>   |
| State: <b>Texas</b>  |
| ZIP Code: <b>76801</b>   |
| Territory:   |
| Country: <b>USA</b>  |
| Foreign Postal Code:   |
| Internal Mail Code:  |
| Telephone No.: <b>325-203-0195</b>   |

**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 TCEQ or the Office of Attorney General on behalf of 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**

|  |
|--|
| <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>XIV. Alternate Designated Representative (ADR) Identifying Information</b>  |
| ADR Name Prefix: ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> 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:   |

## Ryan Glaze

---

**From:** Ryan Glaze  
**Sent:** Tuesday, April 8, 2025 2:34 PM  
**To:** Ideris, Alan  
**Cc:** Halageri, Natasha; Jason Nall; McKay, Stephanie  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Greetings Alan,

Thank you for the updated OP-PBRSUP. If you could please go ahead and submit this updated document to STEERS to certify the document that would be great.

Thanks,

### ***Ryan Glaze***

Operating Permits Section  
Air Permits Division  
Texas Commission on Environmental Quality  
P.O. Box 13087 MC 163  
Austin, TX, 78711  
(512) 239-6212



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---

**From:** Ideris, Alan <Alderis@trccompanies.com>  
**Sent:** Tuesday, April 8, 2025 1:25 PM  
**To:** Ryan Glaze <James.Glaze@tceq.texas.gov>  
**Cc:** Halageri, Natasha <NHalageri@trccompanies.com>; Jason Nall <Jason.Nall@kohler.com>; McKay, Stephanie <SMcKay@trccompanies.com>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Hello Ryan,

We appreciate your review. Please see the attached updated OP-PBRSUP.

Regards,

**Alan "A.J." Ideris**

Houston Office Practice Leader – Air Quality Consulting  
Environmental, Health, Safety, and Sustainability Practice



11767 Katy Freeway, Suite 850, Houston, TX 77079  
C 281.389.1907 T 713.244.1007 | [alderis@trccompanies.com](mailto:alderis@trccompanies.com)  
[LinkedIn](#) | [Instagram](#) | [TRCcompanies.com](http://TRCcompanies.com)

---

**From:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Sent:** Tuesday, March 25, 2025 11:21 AM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>; Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Thank you Ryan.

-Jason

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---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Tuesday, March 25, 2025 11:04 AM  
**To:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Cc:** Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>; Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Greetings Jason,

That would be perfectly fine to do so. The new deadline will be documented as Tuesday, April 8<sup>th</sup>. Thank you for keeping me informed.

Thanks,

***Ryan Glaze***

Operating Permits Section  
Air Permits Division  
Texas Commission on Environmental Quality  
P.O. Box 13087 MC 163  
Austin, TX, 78711  
(512) 239-6212



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**From:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Sent:** Tuesday, March 25, 2025 11:01 AM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>; Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

I just received away messages from both AJ and Natasha with my reply to your e-mail. Looks like AJ is coming back from vacation March 31<sup>st</sup>. Can we extend the response to your requested addendums a week later to Tuesday, April 8<sup>th</sup>?

Please let me know if this date is suitable or if you would prefer it sooner.

Thank You,

Jason Nall

**Jason Nall, P.E.\***  
Manager - Global EHS  
Kohler Co.  
Cell: 920.226.8046  
Email: [jason.nall@kohler.com](mailto:jason.nall@kohler.com)  
*Experience gracious living at [www.kohler.com](http://www.kohler.com)*  
\*Professional Engineer in WI

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---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Tuesday, March 25, 2025 10:55 AM  
**To:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

Greetings Jason,

Thank you so much for the help.

Thanks,

***Ryan Glaze***  
Operating Permits Section  
Air Permits Division  
Texas Commission on Environmental Quality  
P.O. Box 13087 MC 163  
Austin, TX, 78711

(512) 239-6212



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**From:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Sent:** Tuesday, March 25, 2025 10:54 AM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>; Ideris, Alan <[Alderis@trccompanies.com](mailto:Alderis@trccompanies.com)>  
**Cc:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

I am forwarding your message to AJ Ideris (TRC). AJ will be in receipt and respond to Natasha's e-mails and questions regarding open projects while she is on maternity leave.

Thank You,

Jason Nall

**Jason Nall, P.E.\***  
Manager - Global EHS  
Kohler Co.  
Cell: 920.226.8046  
Email: [jason.nall@kohler.com](mailto:jason.nall@kohler.com)  
*Experience gracious living at [www.kohler.com](http://www.kohler.com)*  
\*Professional Engineer in WI

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---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Tuesday, March 25, 2025 10:26 AM  
**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Greetings Natasha,

During the final stages of review, it was noticed that PBR 106.472 is missing from the OP-PBRSUP. If you could please add PBR 106.472 to Tables A & D to that form and send it to me by **Tuesday (April 1<sup>st</sup>)**. Once that is done if you could please submit the updated OP-PBRSUP to STEERS that would be great. If you have any questions about the permit, please let me know.

Thanks,

***Ryan Glaze***

Operating Permits Section  
Air Permits Division  
Texas Commission on Environmental Quality  
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(512) 239-6212



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---

**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Sent:** Friday, February 7, 2025 11:57 AM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

Yes, that is correct.

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Friday, February 7, 2025 11:03 AM  
**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

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Greetings Natsha,

Just to confirm I noticed on the OP-PRBSUP and OP-REQ1 page 89 that PBRs 106.265, SE11, SE40, and SE86 are no longer listed on the document. Does this mean that those PBRs are not longer active at the site. I just need to know so I can remove them from the permit if that is the case.

Thanks,

Ryan

---

**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Sent:** Friday, February 7, 2025 10:47 AM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

Hello Ryan,

Please see attached the updated forms. Let me know if you need anything else.

Thanks,  
Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Monday, February 3, 2025 2:36 PM  
**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Greetings Natasha,

Just to follow up on the question that I wasn't fully sure on. Yes, Standard Exception must be listed on the PBRSUP. The reason is we must know where each PBRs is being used for each unit attached to that PBR. Just wanted to follow up to give you a more definitive answer after consulting with my mentor about it. If you have any questions, please let me know. I look forward to getting the documents from you on Thursday.

Thanks,

***Ryan Glaze***

Operating Permits Section  
Air Permits Division  
Texas Commission on Environmental Quality  
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---

**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Sent:** Monday, February 3, 2025 2:04 PM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Hello Ryan,

Can we talk about these questions? I am a little confused since the PBRs do not match the forms.

Thanks,  
Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Thursday, January 30, 2025 8:38 AM  
**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Good morning Natasha,

I found something that needs to be addressed.

You have a PBR no. 106.264 listed on the OP-PBRSUP however it is not listed on the OP-REQ1 page 87. For 106.264 in needs to be added to the OP-REQ1 to show that it is being used on the permit. please put the PBR no. 106.264 on OP-REQ1 to make sure that it can be added to the permit. As of right now this PBR is not listed on the permit.

Additionally, other PBRs that have been issued are on the permit, however they're not on the OP-PBRSUP. If you could please add those PBRs (106.183, 106.265, 106.472, 3, 7, 11, 40, and 86) to the PBRSUP along with the units associated with those PBRs.

If you could please provide an update to this information to me by **Monday February 3, 2025** that would be great.

Thanks,

***Ryan Glaze***

Operating Permits Section  
Air Permits Division  
Texas Commission on Environmental Quality  
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(512) 239-6212



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**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Sent:** Tuesday, January 28, 2025 1:11 PM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>  
**Subject:** Re: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant



No this renewal is not being incorporated since it is still pending issuance

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---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Tuesday, January 28, 2025 1:09:01 PM  
**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Greetings Natasha,

That is great to hear! One final thing, I noticed that there is a pending renewal application for NSR authorization number 6414. I wanted to know if this renewal is being incorporated in this minor revision.

Thanks,

Ryan Glaze

---

**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Sent:** Tuesday, January 28, 2025 1:06 PM  
**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Hello Ryan,

We submitted the updated forms via STEERS. Let me know if you need anything else.

Thanks,  
Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>  
**Sent:** Thursday, January 23, 2025 3:34 PM  
**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>  
**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>  
**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Hi Natasha,

Great! Thank you so much for the update. Some final things that I just wanted to make sure of before continuing with your permit. I noticed that there is a pending renewal application for NSR authorization number 6414. I wanted to know if this renewal is being incorporated in this minor revision. Additionally, if you could please submit the OP-UA66 and the final OP-CRO1 forms to STEERS if you have not done so already. If you could please have this done for me my **January 29, 2025** that would be great. If you have any questions for me, please let me know.

Thanks,

***Ryan Glaze***

Operating Permits Section

Air Permits Division

Texas Commission on Environmental Quality

P.O. Box 13087 MC 163

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(512) 239-6212



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**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Sent:** Thursday, January 23, 2025 9:51 AM

**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

We reviewed the updated draft permit and are good with the conditions.

Thanks,  
Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Sent:** Friday, January 17, 2025 4:49 PM

**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Greetings Natasha,

I have attached your updated Draft permit. If you have any questions going forward, please feel free to reach out to me.

Have a good weekend,

Ryan Glaze

---

**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Sent:** Friday, January 17, 2025 8:48 AM

**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

Please see attached.

Thanks,  
Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Sent:** Thursday, January 16, 2025 3:59 PM

**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Greetings Natasha,

It seems the OP-UA66 form was filled out incorrectly, the compliance option given (5810-C) should have had you go and fill out the CMS question of either yes or no. 95% reduction, affected source type, facility type, large parts, and operation type does not have to be answer.

I have attached the original OP-UA66 that was submitted with the initial application. The way that you have it filled out there is correct.

If you could do the same for units E080-084 and E110-113 that should do it. If you could please have these updates to me by **next Thursday (January 23, 2025)** that would be great. If you have any questions about what I am asking, please let me know.

Thanks,

***Ryan Glaze***

Operating Permits Section

Air Permits Division

Texas Commission on Environmental Quality

P.O. Box 13087 MC 163

Austin, TX, 78711

(512) 239-6212



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---

**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Sent:** Thursday, January 16, 2025 10:46 AM

**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

Please see attached the updated OP-UA66 form for your review.

Let me know if you need anything else from us.

Thanks,

Natasha

---

**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Sent:** Thursday, January 9, 2025 3:13 PM

**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP O2711/Project 37391, Kohler Co./Brownwood Plant

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Greetings,

I am following up based on our call yesterday afternoon. Based on your comments in the call, you plan to readd Unit IDs E110, E111, E112, and E113 to the permit since they are still in operation. Additionally, we discussed updated the high level applicability to MACT WWWW that remains in the permit for Unit IDs E80, E81, E82, E83, and E-84. Please submit an updated form OP-UA66, Table 1 for each of the units listed above (both the E110 series and E80 series units). Once I have received the updates, I will update the draft permit and send you the updated copy. If you could have these updates to me by **January 17, 2025** that would be great.

Please let me know if you have any questions

Thanks,

***Ryan Glaze***

Operating Permits Section

Air Permits Division

Texas Commission on Environmental Quality

P.O. Box 13087 MC 163

Austin, TX, 78711

(512) 239-6212



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**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Sent:** Friday, December 20, 2024 3:36 PM

**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

We are open the morning of Monday, Jan. 6, or the afternoons of Jan. 7 and 8. Let me know if these slots work for you.

Thanks,  
Natasha

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**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Sent:** Friday, December 20, 2024 10:23 AM

**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

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Greetings Natasha,

Yes, I'm able to give an extension till January 15, 2025. When it comes to setting up a teams meeting if you can tell me what days during week of January 6 that you are available to meet I should be able to set up a teams meeting for us during that time. Once I get your response, I should have the teams meetings information sent out by Monday of next week. If you have any other questions, please let me know.

Thanks,

Ryan Glaze

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**From:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Sent:** Friday, December 20, 2024 9:33 AM

**To:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Cc:** Jason Nall <[Jason.Nall@kohler.com](mailto:Jason.Nall@kohler.com)>

**Subject:** RE: [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

Hi Ryan,

We have reviewed the draft SOP and had a few questions which we would like to discuss with you over a Teams call. Due to the holidays, we are not available for the next 2 weeks and wanted to schedule a call for the week of January 6. Once we resolve our issues over the call, we can provide our responses.

As such, can you please provide us an extension to provide our responses till January 15, 2025?

Thanks,  
Natasha

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**From:** Ryan Glaze <[James.Glaze@tceq.texas.gov](mailto:James.Glaze@tceq.texas.gov)>

**Sent:** Tuesday, December 17, 2024 9:30 AM

**To:** Halageri, Natasha <[NHalageri@trccompanies.com](mailto:NHalageri@trccompanies.com)>

**Cc:** Ulises Luna <[Ulises.Luna@tceq.texas.gov](mailto:Ulises.Luna@tceq.texas.gov)>; Rhyen Stone <[Rhyen.Stone@tceq.texas.gov](mailto:Rhyen.Stone@tceq.texas.gov)>

**Subject:** [EXTERNAL] Working Draft Permit -- FOP 02711/Project 37391, Kohler Co./Brownwood Plant

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Greetings,

I have conducted a technical review of minor revision application for Kohler Co./Brownwood Plant. 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 on the working draft permit by Due Date **January 3, 2025**.

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,

***Ryan Glaze***

Operating Permits Section

Air Permits Division

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