Carolyn Thomas

From: eNotice TCEQ

Sent: Friday, August 8, 2025 8:09 AM

To: 'Jose.menendez@senate.texas.gov'; 'Barbara.gervin-hawkins@house.texas.gov'

Subject: TCEQ Notice - Permit Number O4795 **Attachments:** TCEQ Notice - O4795_38614.pdf

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

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

Questions regarding this email may be submitted either by replying directly to this email or by calling Mr. Rhyan Stone with the Air Permits Division at (512) 239-1293.

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

Brooke T. Paup, *Chairwoman*Bobby Janecka, *Commissioner*Catarina R. Gonzales, *Commissioner*Kelly Keel, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 8, 2025

THE HONORABLE JOSE MENENDEZ TEXAS SENATE PO BOX 12068 AUSTIN TX 78711-2068

Re: Accepted Federal Operating Permit Initial Issuance Application

Project Number: 38614
Permit Number: O4795
Flexcon Industrial LLC
San Antonio Facility

San Antonio, Bexar County

Regulated Entity Number: RN102906336 Customer Reference Number: CN603858580

Dear Senator Menendez:

This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) initial issuance application for a site located in your district. As part of this permitting process, the applicant is required to publish a formal newspaper public notice. The notice will inform the public of their right to make comments or request a public hearing. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. https://gisweb.tceq.texas.gov/LocationMapper/?marker=98.37,29.4819&level=13.

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

The Honorable Jose Menendez Page 2 August 8, 2025

Re: Accepted Federal Operating Permit Initial Issuance Application

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

Sincerely,

Samuel Short, Deputy Director

Air Permits Division

Office of Air

Brooke T. Paup, Chairwoman Bobby Janecka, Commissioner Catarina R. Gonzales, Commissioner Kelly Keel, Executive Director



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 8, 2025

THE HONORABLE BARBARA GERVIN-HAWKINS TEXAS HOUSE OF REPRESENTATIVES PO BOX 2910 AUSTIN TX 78768-2910

Re: Accepted Federal Operating Permit Initial Issuance Application

Project Number: 38614 Permit Number: 04795 Flexcon Industrial LLC San Antonio Facility

San Antonio, Bexar County

Regulated Entity Number: RN102906336 Customer Reference Number: CN603858580

Dear Representative Gervin-Hawkins:

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

https://gisweb.tceq.texas.gov/LocationMapper/?marker=-98.37,29.4819&level=13.

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

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

Sincerely,

Samuel Short, Deputy Director Air Permits Division

Office of Air

Texas Commission on Environmental Quality

Title V New

Site Information (Regulated Entity)

What is the name of the permit area to be

authorized?

Does the site have a physical address?

Physical Address

Number and Street 6110 RITTIMAN RD SAN ANTONIO City

State TX ZIP 78218 **BEXAR** County Latitude (N) (##.#####) 29.4819 Longitude (W) (-###.#####) -98.37

Primary SIC Code Secondary SIC Code

Primary NAICS Code 322299

Secondary NAICS Code

Regulated Entity Site Information

What is the Regulated Entity's Number (RN)? RN102906336

What is the name of the Regulated Entity (RE)? ARLON ENGINEERED COATED PRODUCTS

Does the RE site have a physical address?

Because there is no physical address, describe 6110 Rittiman Rd, San Antonio, TX

how to locate this site:

SAN ANTONIO City

State TX ZIP 78218 **BEXAR** County Latitude (N) (##.#####) 29.4819 Longitude (W) (-###.#####) -98.37 Facility NAICS Code 322299

What is the primary business of this entity? PRODUCTION OF FILMS FOILS FOAMS OR

PAPERS COATED

San Antonio Facility

Yes

Customer (Applicant) Information

How is this applicant associated with this site? Owner Operator What is the applicant's Customer Number CN603858580

(CN)?

Type of Customer Other

Full legal name of the applicant:

Flexcon Industrial LLC Legal Name

801376392 Texas SOS Filing Number

Federal Tax ID

State Franchise Tax ID 32043497539

State Sales Tax ID Local Tax ID

DUNS Number 1136035

Number of Employees

Independently Owned and Operated?

Responsible Official Contact

Person TCEQ should contact for questions

about this application:

Organization Name FLEXcon Industrial LLC

Prefix MR
First Robert

Middle

Last Nicholson

Suffix Credentials

Title Director of Maintenance, Engineering, and EHS

Enter new address or copy one from list: Site Physical Address

Mailing Address

Address Type Domestic

Mailing Address (include Suite or Bldg. here, if 6110 RITTIMAN RD

applicable)

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

City SAN ANTONIO

 State
 TX

 ZIP
 78218

 Phone (###-###)
 7149856521

Extension

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

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

E-mail rnicholson@arlon.com

Technical Contact

Person TCEQ should contact for questions

about this application:

Same as another contact? Responsible Official Contact

Organization Name FLEXcon Industrial LLC

Prefix MR First Robert

Middle

Last Nicholson

Suffix Credentials

Title Director of Maintenance, Engineering, and EHS

Enter new address or copy one from list:

Mailing Address

Address Type Domestic

Mailing Address (include Suite or Bldg. here, if 6110 RITTIMAN RD

applicable)

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

City SAN ANTONIO

State TX ZIP 782

ZIP 78218 Phone (###-####) 7149856521

Extension

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

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

E-mail rnicholson@arlon.com

Title V General Information - New

1) Permit Latitude Coordinate: 29 Deg 28 Min 55 Sec 2) Permit Longitude Coordinate: 98 Deg 22 Min 12 Sec

3) Is this submittal a new application or an New Application update to an existing application?

3.1. What type of Federal Operating Permit are SOP you applying for?

3.2. Is this submittal an abbreviated or a full Abbreviated application?

3.3. Is this application for a portable facility?

3.4. Is the site a non-major source subject to No the Federal Operating Permit Program?

3.5. Are there any permits that should be No voided upon issuance of this permit application

through permit conversion?

3.6. Are there any permits that should be

No

voided upon issuance of this permit application through permit consolidation?

4) Does this application include Acid Rain No Program or Cross-State Air Pollution Rule requirements?

Title V Attachments New

Attach OP-1 (Site Information Summary)

Attach OP-ACPS (Application Compliance Plan and Schedule)

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

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUM (Individual Unit Summary)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

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=270393>FLEXcon SA Initial SOP

Application abbrev final.pdf

Hash EBBFC7883192D9B1BBDBAE5C849B27B668E8AC607BD6932A1530EB6A2B23BF7D

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 Robert Nicholson, the owner of the STEERS account ER115353.
- 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 enforcemer of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
- 7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
- 8. I am knowingly and intentionally signing Title V New.
- 9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEC

OWNER OPERATOR Signature: Robert Nicholson OWNER OPERATOR

Account Number: ER115353
Signature IP Address: 100.43.199.172
Signature Date: 2025-07-21

 Signature Hash:
 0F23C08677F29B5A347AC66469B7ABA75523A5C57D97F61C7E0A272E2A2228E5

 Form Hash Code at
 3AE6F5C6B16C226D060A9A4580D15F5B224EAA9A544AC2160EE9BB5B02F55423

time of Signature:

Submission

Reference Number: The application reference number is 802490

Submitted by:

The application was submitted by ER115353/Robert Nicholson

Submitted Timestamp:	The application was submitted on 2025-07-21 at 16:32:19 CDT
Submitted From:	The application was submitted from IP address 100.43.199.172
Confirmation Number:	The confirmation number is 665961
Steers Version:	The STEERS version is 6.92

Additional Information

Application Creator: This account was created by Heriberto Quintanilla



9737 Great Hills Trail, Suite 340, Austin, TX 78759 / P 713-955-1230 / F (713) 955-1201 / trinityconsultants.com

July 21, 2025

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

RE: Abbreviated Application for Initial Issuance Title V Permit FLEXcon Industrial, LLC San Antonio Facility CN603858580/RN102906336

Dear APIRT:

On behalf of FLEXcon Industrial, LLC, Trinity Consultants is hereby submitting this abbreviated application for the initial issuance of a Site Operating Permit for the San Antonio Facility in Bexar County, TX.

If you have any questions or require additional information, please feel free to contact me at 737-284-0687 or heriberto.quintanilla@trinityconsultants.com.

Sincerely,

TRINITY CONSULTANTS

Heriberto Quintanilla, P.E.

Staff Consultant

Attachments

cc: Mr. Robert Nicholson, Director of Maintenance, Engineering, and EHS, FLEXcon Industrial, LLC, San Antonio, TX (email)

Mr. Carl Ortmann, Air Section Manager, TCEQ Region 13, San Antonio, TX EPA, Region 6. (R6AirPermitsTX@epa.gov)

ABBREVIATED INITIAL APPLICATION

Site Operating Permit

FLEXcon Industrial, LLC / San Antonio Facility CN603858580 RN102906336

Prepared By:

Pete Buckman, P.E. – Senior Consultant Heriberto Quintanilla, P.E. – Staff Consultant Gabriel Taliaferro – Staff Consultant

TRINITY CONSULTANTS

9737 Great Hills Trail Suite 340 Austin, TX 78759 512-693-4191

July 2025

Project 254404.0216



TABLE OF CONTENTS

1.	PROJECT INFORMATION	1-1
2.	ADMINISTRATIVE FORMS	2-1

1. PROJECT INFORMATION

FLEXcon Industrial, LLC (FLEXcon) operates as adhesive film products facility in San Antonio, Bexar County, Texas. The San Antonio Facility is authorized to operate under NSR Permit No. 52534. The San Antonio non-attainment area was reclassified by the EPA from "Moderate" to "Serious" designation, meaning that the threshold limits for Title V pollutants changed from 100 tons per year (tpy) to 50 tpy. The facility is now subject to the Title V program. The purpose of this application is to obtain the Site Operating Permit (SOP). An abbreviated initial application is being submitted in accordance with 30 TAC Chapter 122, Subchapter B, § 122.130(b)(2), with a full initial application follow-up to be submitted at the time dictated by TCEQ.

2. ADMINISTRATIVE FORMS

This section contains the following forms and information:

- ► OP-1 Site Information Summary
- ▶ TCEQ Form 20960 Public Involvement Plan Form for Permit and Registration Applications

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.

I.	Company Identifying Information
A.	Company Name: FLEXcon Industrial, LLC
B.	Customer Reference Number (CN): CN603858580
C.	Submittal Date (mm/dd/yyyy): 07/21/2025
II.	Site Information
A.	Site Name: Arlon Engineered Coated Products
B.	Regulated Entity Reference Number (RN): RN102906336
C.	Indicate affected state(s) required to review permit application: (Check the appropriate box[es].)
Δ	R CO KS LA NM OK N/A
D.	Indicate all pollutants for which the site is a major source based on the site's potential to emit: (Check the appropriate box[es].)
⊠ V	$OC \square \ NO_X \square \ SO_2 \square \ PM_{10} \square \ CO \square \ Pb \square \ HAPS$
Other	r:
E.	Is the site a non-major source subject to the Federal Operating Permit Program? ☐ YES ☒ NO
F.	Is the site within a local program area jurisdiction?
G.	Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? ☐ YES ☒ NO
H.	Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:
III.	Permit Type
A.	Type of Permit Requested: (Select only one response)
⊠ Si	ite Operating Permit (SOP)

Federal Operating Permit Program Site Information Summary Form OP-1 (Page 2)

IV.	Initial Application Information (Complete for Initial Issuance Applications Only.)	
A.	Is this submittal an abbreviated or a full application?	Abbreviated Full
B.	If this is a full application, is the submittal a follow-up to an abbreviated application?	☐ YES ☐ NO
C.	If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit?	☐ YES ⊠ NO
D.	Has an electronic copy of this application been submitted (or is being submitted) to EPAS (Refer to the form instructions for additional information.)	YES NO
Е.	Has the required Public Involvement Plan been included with this application?	⊠ YES □ NO
V.	Confidential Information	
A.	Is confidential information submitted in conjunction with this application?	☐ YES ⊠ NO
VI.	Responsible Official (RO) Identifying Information	
RO N	Name Prefix: (Mr. Mrs. Mrs. Dr.)	
RO F	Full Name: Robert Nicholson	
RO T	Title: Director of Maintenance, Engineering, and EHS	
Empl	oyer Name: FLEXcon Industrial, LLC	
Maili	ng Address: 6110 Rittiman Rd	
City:	San Antonio	
State	: Texas	
ZIP (Code: 78218	
Terri	tory:	
Cour	itry:	
Forei	gn Postal Code:	
Inter	nal Mail Code:	
Telep	phone No.: 714-985-6521	
Fax 1	No.:	
Emai	l: RNicholson@arlon.com	

Federal Operating Permit Program Site Information Summary Form OP-1 (Page 3)

VII. Technical Contact Identifying Information (Complete if different from RO.)
Technical Contact Name Prefix: (Mr. Mrs. Mrs. Dr.)
Technical Contact Full Name:
Technical Contact Title:
Employer Name:
Mailing Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.:
Fax No.:
Email:
VIII. Reference Only Requirements (For reference only.)
A. State Senator: Jose Menendez, District 26
B. State Representative: Barbara Gervin-Hawkins, District 120
C. Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? ☐ YES ☐ NO ☒ N/A
D. Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322?
E. Indicate the alternate language(s) in which public notice is required: Spanish

Federal Operating Permit Program Site Information Summary Form OP-1 (Page 4)

IX.	Off-Site Permit Request (Optional for applicants requesting to hold the FOP and records at an off-site location.)
A.	Office/Facility Name:
B.	Physical Address:
City:	
State:	
ZIP C	Code:
Territ	ory:
Coun	try:
Forei	gn Postal Code:
C.	Physical Location:
D.	Contact Name Prefix: (Mr. Mrs. Dr.)
Conta	act Full Name:
Е.	Telephone No.:
X.	Application Area Information
A.	Area Name: San Antonio Facility
В.	Physical Address: 6110 Rittiman Road
City:	San Antonio
State:	Texas
ZIP C	Code: 78218
C.	Physical Location:
D.	Nearest City:
Е.	State:
F.	ZIP Code:

Federal Operating Permit Program Site Information Summary Form OP-1 (Page 5)

X.	Application Area Information (continued)
G.	Latitude (nearest second): 29° 28' 55"
Н.	Longitude (nearest second): 98° 22' 12"
I.	Are there any emission units that were not in compliance with the applicable requirements identified in the application at the time of application submittal?
J.	Indicate the estimated number of emission units in the application area: 4
K.	Are there any emission units in the application area subject to the Acid Rain Program?
XI.	Public Notice (Complete this section for SOP Applications and Acid Rain Permit Applications only.)
A.	Name of a public place to view application and draft permit: Molly Pruitt Library
B.	Physical Address: 5110 Walzem Road
City: San Antonio	
ZIP	Code: 78218
C.	Contact Person (Someone who will answer questions from the public during the public notice period):
Cont	tact Name Prefix: (Mr. Mrs. Ms. Dr.):
Cont	tact Person Full Name: Robert Nicholson
Cont	tact Mailing Address: 6110 Rittiman Road
City	: San Antonio
State	e: Texas
ZIP Code: 78218	
Terr	itory:
Cou	ntry:
Foreign Postal Code:	
Internal Mail Code:	
Tele	phone No.: (210) 798-1929

Federal Operating Permit Program Site Information Summary Form OP-1 (Page 6)

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

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

Complete Sections XIII and XIV for Acid Rain Permit and CSAPR applications only. Please include a copy of the Certificate of Representation submitted to EPA.	
XIV. Alternate Designated Representative (ADR) Identifying Information	
ADR Name Prefix: (Mr. Mrs. Ms. Dr.)	
ADR Full Name:	
ADR Title:	
Employer Name:	
Mailing Address:	
City:	
State:	
ZIP Code:	
Territory:	
Country:	
Foreign Postal Code:	
Internal Mail Code:	
Telephone No.:	
Fax No.:	
Email:	

Public Involvement Plan Form for Permit and Registration Applications

The Public Involvement Plan is intended to provide applicants and the agency with information about how public outreach will be accomplished for certain types of applications in certain geographical areas of the state. It is intended to apply to new activities; major changes at existing plants, facilities, and processes; and to activities which are likely to have significant interest from the public. This preliminary screening is designed to identify applications that will benefit from an initial assessment of the need for enhanced public outreach.

All applicable sections of this form should be completed and submitted with the permit or registration application. For instructions on how to complete this form, see TCEQ-20960-inst.

Section 1. Preliminary Screening	
New Permit or Registration Application New Activity – modification, registration, amendment, facility, etc. (see instructions)	
If neither of the above boxes are checked, completion of the form is not required and does not need to be submitted.	
Section 2. Secondary Screening	
Requires public notice, Considered to have significant public interest, and Located within any of the following geographical locations: Austin Dallas Fort Worth Houston San Antonio West Texas Texas Panhandle Along the Texas/Mexico Border Other geographical locations should be decided on a case-by-case basis	
If all the above boxes are not checked, a Public Involvement Plan is not necessary. Stop after Section 2 and submit the form.	
Public Involvement Plan not applicable to this application. Provide brief explanation. The site is not considered to have significant public interest.	

TCEQ-20960 (02-09-2023) Page 1 of 4