

Nancy Birdsong

From: AirRR
Sent: Thursday, November 6, 2025 10:00 AM
To: Donna.campbell@senate.texas.gov; 'alan.schoolcraft@house.texas.gov'; eNotice TCEQ
Subject: FW: TCEQ Notice - Permit Number O1316
Attachments: TCEQ Notice - O1316_39138.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*
Catarina R. Gonzales, *Commissioner*
Tonya R. Miller, *Commissioner*
Kelly Keel, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 6, 2025

THE HONORABLE DONNA CAMPBELL
TEXAS SENATE
PO BOX 12068
AUSTIN TX 78711-2068

Re: Accepted Federal Operating Permit Renewal Application
Project Number: 39138
Permit Number: O1316
Structural Metals, Inc.
Smi-texas
Seguin, Guadalupe County
Regulated Entity Number: RN102413689
Customer Reference Number: CN600129001

Dear Senator Campbell:

This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) renewal 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=-98.0325,29.575555&level=13>.

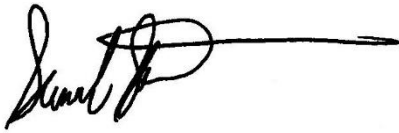
The FOP program regulates both new and existing major sources of emissions. The goal of the program is to improve air quality in Texas through increased compliance by codifying existing applicable regulatory requirements into the FOP. The FOP provides the applicant authorization to operate the equipment 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 Donna Campbell
Page 2
November 6, 2025

Re: Accepted Federal Operating Permit Renewal Application

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

Sincerely,

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

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

Brooke T. Paup, *Chairwoman*
Catarina R. Gonzales, *Commissioner*
Tonya R. Miller, *Commissioner*
Kelly Keel, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 6, 2025

THE HONORABLE ALAN SCHOOLCRAFT
TEXAS HOUSE OF REPRESENTATIVES
PO BOX 2910
AUSTIN TX 78768-2910

Re: Accepted Federal Operating Permit Renewal Application
Project Number: 39138
Permit Number: O1316
Structural Metals, Inc.
Smi-texas
Seguin, Guadalupe County
Regulated Entity Number: RN102413689
Customer Reference Number: CN600129001

Dear Representative Schoolcraft:

This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) renewal 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=-98.0325,29.575555&level=13>.

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

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

Sincerely,

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

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

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

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

I. Identifying Information
Account No.: GL-0028-H
Regulated Entity Number: RN 102413689
Customer Reference Number: CN 600129001
Permit Number: 01316
Area Name: SMI - Texas
Company: Structural Metals, Inc.
II. Change Type
Action Type: ☒ New Appointment ☐ Administrative Information Change
Contact Type (only one response accepted per form): ☒ Responsible Official ☐ Designated Representative (<i>Acid Rain Program and/or CSAPR sources only</i>) ☐ Alternate Designated Representative (<i>Acid Rain Program and/or CSAPR sources only</i>)

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

III. Responsible Official/Designated Representative/Alternate Designated Representative Information
Conventional Title:
☒ Mr.
☐ Mrs.
☐ Ms.
☐ Dr.
Name (Driver's License/STEERS): John C. Walker
Title: Director of Operations
Appointment Effective Date: 09/01/25
Telephone Number: (870) 949-7084
Fax Number.:
Company Name: Structural Metals, Inc.
Mailing Address: 1 Steel Mill Dr.
City: Seguin
State: Texas
ZIP Code: 78155
Email Address: Cole.Walker@cmc.com

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

IV. Certification of Truth, Accuracy, and Completeness

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

I, John C. Walker, certify that based on information and belief formed Reasonable inquiry, the statement and information stated above are true, accurate, and complete.

Signature: _____

Signature Date: _____

Seguin Public Library

www.seguintexas.gov

 **4.7/5** (94 reviews) · Library in Seguin, TX

 313 West Nolte Street, Seguin, TX 78155

 **Open** · Closes 8 PM · [More hours ▼](#)

 (830) 401-2422

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.

I. Identifying Information
RN: RN102413689
CN: CN600129001
Account No.: GL-0028-H
Permit No.: O1316
Project No.: TBA
Area Name: SMI-Texas
Company Name: Structural Metals, Inc.
II. Certification Type <i>(Please mark appropriate box)</i>
☒ Responsible Official Representative ☐ Duly Authorized Representative
III. Submittal Type <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>
☐ SOP/TOP Initial Permit Application ☒ Permit Revision, Renewal, or Reopening
☐ GOP Initial Permit Application ☐ Update to Permit Application
☐ Other:

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

IV. Certification of Truth

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

I, John C. Walker certify that I am the Responsible Official (RO)
(Certifier Name printed or typed) (RO or DAR)

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:

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).

Time Period: From _____ to _____
(Start Date) (End Date)

Specific Dates: 10/01/2025
(Date 1) (Date 2) (Date 3) (Date 4)

(Date 5) (Date 6)

Signature:  Signature Date: 9/30/2025

Title: Director of Operations

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.

I. Identifying Information
RN:
CN:
Account No.:
Permit No.:
Project No.:
Area Name:
Company Name:
II. Certification Type <i>(Please mark appropriate box)</i>
☐ Designated Representative ☐ Alternated Designated Representative
III. Requirement and Submittal Type <i>(Please mark the appropriate boxes for each row)</i>
Requirement: ☐ Acid Rain Permit ☐ Cross-State Air Pollution Rule (CSAPR)
Submittal Type: ☐ Initial Permit Application ☐ Update to Permit Application
☐ Permit Revision or Renewal ☐ Other:

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

IV. Certification of Truth

I, _____, certify that I am the _____
(Certifier Name printed or typed) *(RO or DAR)*

am authorized to make this submission on behalf of the owners and operators of the source or units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment. The above certification is for the statements and information dated during the time period or on the specific date(s) below:

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).

Time Period: From _____ to _____
(Start Date) *(End Date)*

Specific Dates: _____
(Date 1) *(Date 2)* *(Date 3)* *(Date 4)*

(Date 5) *(Date 6)*

Signature: _____ Signature Date: _____

Title: _____

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

Date: 09/26/2025	Regulated Entity No.: RN102413689	Permit No.: O1316
Company Name: Structural Metals, Inc.		Area Name: SMI-Texas, Seguin Mill

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

Part 1

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

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

Date: 09/26/2025	Regulated Entity No.: RN102413689	Permit No.: O1316
Company Name: Structural Metals, Inc.		Area Name: SMI-Texas, Seguin Mill

Part 2

A. Compliance Schedule		
If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. <i>(See form instruction for details.)</i> If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.		
1. Specific Non-Compliance Situation		
Unit/Group/Process ID No.(s):		
SOP Index No.:		
Pollutant:		
Applicable Requirement		
Citation	Text Description	
2. Compliance Status Assessment Method and Records Location		
Citation	Text Description	Location of Records/Documentation
3. Non-compliance Situation Description		
4. Corrective Action Plan Description		
5. List of Activities/Milestones to Implement the Corrective Action Plan		

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

Date: 09/26/2025	Regulated Entity No.: RN102413689	Permit No.: O1316
Company Name: Structural Metals, Inc.		Area Name: SMI-Texas, Seguin Mill

Part 2 (continued)

6. Previously Submitted Compliance Plan(s)	
Type of Action	Date Submitted
7. Progress Report Submission Schedule	

Reset Form

Print Form

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

Date: 09/26/2025	
Permit No.: O1316	
Regulated Entity No.: RN102413689	
Company Name: Structural Metals, Inc.	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? ☒ YES ☐ NO	
I. Application Type	
Indicate the type of application:	
☒ Renewal	
☐ Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
☐ Significant Revision	
☐ Revision Requesting Prior Approval	
☐ Administrative Revision	
☐ Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only	☐ YES ☐ NO
For GOP Revisions Only	☐ YES ☐ 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_x ☐ SO₂ ☐ PM₁₀ ☐ 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:
Permit No.:
Regulated Entity No.:
Company Name:

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

			Unit/Group	Process		
Revision No.	Revision Code	New Unit	ID No.	Applicable Form	NSR Authorization	Description of Change and Provisional Terms and Conditions

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 3
Texas Commission on Environmental Quality**

Date:
Permit No.:
Regulated Entity No.:
Company Name:
I. Significant Revision <i>(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)</i>
A. Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322? ☐ YES ☐ NO
B. Indicate the alternate language(s) in which public notice is required:
C. Will, there be a change in air pollutant emissions as a result of the significant revision? ☐ YES ☐ NO

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 3
Texas Commission on Environmental Quality**

Using the table below, indicate the air pollutant(s) that will be changing and include a brief description of the change in pollutant emissions for each pollutant:

Pollutant	Description of the Change in Pollutant Emissions

Print Form

Reset Form

**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: Structural Metals, Inc.
B. Customer Reference Number (CN): CN 600129001
C. Submittal Date (mm/dd/yyyy):
II. Site Information
A. Site Name: SMI-Texas
B. Regulated Entity Reference Number (RN): RN 102413689
C. Indicate affected state(s) required to review permit application: <i>(Check the appropriate box[es].)</i>
☐ AR ☐ 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: <i>(Check the appropriate box[es].)</i>
☒ VOC ☒ NO _x ☒ SO ₂ ☒ PM ₁₀ ☒ CO ☐ Pb ☐ HAPS
Other:
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? ☐ Yes ☒ No
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: <i>(Select only one response)</i>
☒ Site Operating Permit (SOP) ☐ Temporary Operating Permit (TOP) ☐ General Operating Permit (GOP)

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

IV. Initial Application Information <i>(Complete for Initial Issuance Applications Only.)</i>	
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 EPA? (Refer to the form instructions for additional information.)	☐ Yes ☐ No
E. 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 Name Prefix: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)	
RO Full Name: John C. Walker	
RO Title: Director of Operations	
Employer Name: Structural Metals, Inc.	
Mailing Address: P.O. Box 911	
City: Seguin	
State: Texax	
ZIP Code: 78156	
Territory:	
Country:	
Foreign Postal Code:	
Internal Mail Code:	
Telephone No.: 830-372-8500	
Fax No.: 830-372-8502	
Email: Cole.Walker@cmc.com	

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

VII. Technical Contact Identifying Information <i>(Complete if different from RO.)</i>
Technical Contact Name Prefix: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
Technical Contact Full Name: Randall Walker
Technical Contact Title: Central Division Environmental Manager
Employer Name: Structural Metals, Inc.
Mailing Address: P.O. Box 911
City: Seguin
State: Texas
ZIP Code: 78156
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 830-372-8507
Fax No.:
Email: Randall.Walker@cmc.com
VIII. Reference Only Requirements <i>(For reference only.)</i>
A. State Senator: Donna Campbell
B. State Representative: Alan Schoolcraft
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? ☒ Yes ☐ No
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)
Texas Commission on Environmental Quality**

IX. Off-Site Permit Request <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: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
Contact Full Name:
E. Telephone No.:
X. Application Area Information
A. Area Name: SMI Texas
B. Physical Address: 1 Steel Mill Dr.
City: Seguin
State: TX
ZIP Code: 78155
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**

X. Application Area Information (continued)
G. Latitude (nearest second): 029 degrees North 34 minutes 32 seconds
H. Longitude (nearest second): 098 degrees West 01 minutes 57 seconds
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? ☐ Yes ☒ No
J. Indicate the estimated number of emission units in the application area: 15
K. Are there any emission units in the application area subject to the Acid Rain Program? ☐ Yes ☒ No
L. Affected Source Plant Code (or ORIS/Facility Code):
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: Seguin Public Library
B. Physical Address: 313 W Nolte Street
City: Seguin
ZIP Code: 78155
C. Contact Person (Someone who will answer questions from the public during the public notice period):
Contact Name Prefix: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.):
Contact Person Full Name: Randall Walker
Contact Mailing Address: P.O. Box 911
City: Seguin
State: TX
ZIP Code: 78156
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 830-372-8507

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

XII. Delinquent Fees and Penalties

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

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

XIII. Designated Representative (DR) Identifying Information

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

DR Full Name:

DR Title:

Employer Name:

Mailing Address:

City:

State:

ZIP Code:

Territory:

Country:

Foreign Postal Code:

Internal Mail Code:

Telephone No.:

Fax No.:

Email:

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

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

XIV. Alternate Designated Representative (ADR) Identifying Information

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

ADR Full Name:

ADR Title:

Employer Name:

Mailing Address:

City:

State:

ZIP Code:

Territory:

Country:

Foreign Postal Code:

Internal Mail Code:

Telephone No.:

Fax No.:

Email:

PRINT FORM

RESET FORM

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

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

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II. Change Type
Action Type: ☒ New Appointment ☐ Administrative Information Change
Contact Type (only one response accepted per form): ☒ Responsible Official ☐ Designated Representative (<i>Acid Rain Program and/or CSAPR sources only</i>) ☐ Alternate Designated Representative (<i>Acid Rain Program and/or CSAPR sources only</i>)

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

III. Responsible Official/Designated Representative/Alternate Designated Representative Information
Conventional Title:
☒ Mr.
☐ Mrs.
☐ Ms.
☐ Dr.
Name (Driver's License/STEERS): John C. Walker
Title: Director of Operations
Appointment Effective Date: 09/01/25
Telephone Number: (870) 949-7084
Fax Number.:
Company Name: Structural Metals, Inc.
Mailing Address: 1 Steel Mill Dr.
City: Seguin
State: Texas
ZIP Code: 78155
Email Address: Cole.Walker@cmc.com

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

IV. Certification of Truth, Accuracy, and Completeness

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

I, John C. Walker, certify that based on information and belief formed Reasonable inquiry, the statement and information stated above are true, accurate, and complete.

Signature: _____

Signature Date: _____



TCEQ Core Data Form

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

SECTION I: General Information

1. Reason for Submission (If other is checked please describe in space provided.)		
☐ New Permit, Registration or Authorization (Core Data Form should be submitted with the program application.)		
☒ Renewal (Core Data Form should be submitted with the renewal form)	☐ Other	
2. Customer Reference Number (if issued)	Follow this link to search for CN or RN numbers in Central Registry**	3. Regulated Entity Reference Number (if issued)
CN 600129001		RN 102413689

SECTION II: Customer Information

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

18. Telephone Number	19. Extension or Code	20. Fax Number (if applicable)
() -		() -

SECTION III: Regulated Entity Information

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

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

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

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

☐ Dam Safety	☐ Districts	☐ Edwards Aquifer	☐ Emissions Inventory Air	☐ Industrial Hazardous Waste
☐ Municipal Solid Waste	☒ New Source Review Air	☐ OSSF	☐ Petroleum Storage Tank	☐ PWS
☐ Sludge	☐ Storm Water	☒ Title V Air	☐ Tires	☐ Used Oil
☐ Voluntary Cleanup	☐ Wastewater	☐ Wastewater Agriculture	☐ Water Rights	☐ Other:

SECTION IV: Preparer Information

40. Name:	Jon Greene		41. Title:	Senior Project Manager
42. Telephone Number	43. Ext./Code	44. Fax Number	45. E-Mail Address	
(512) 493-6057		() -	jgreene@cecinc.com	

SECTION V: Authorized Signature

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

Company:	Structural Metals, Inc.		Job Title:	Environmental Manager Central Region	
Name (In Print):	Randall Walker			Phone:	(830) 372- 8507
Signature:	<i>Randall Walker</i>			Date:	10/01/2025

Texas Commission on Environmental Quality

Title V Existing

1316

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	SMI-TEXAS
Does the site have a physical address?	Yes
Physical Address	
Number and Street	1 STEEL MILL DR
City	SEGUIN
State	TX
ZIP	78155
County	GUADALUPE
Latitude (N) (##.#####)	29.575555
Longitude (W) (-###.#####)	98.0325
Primary SIC Code	3312
Secondary SIC Code	
Primary NAICS Code	331110
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN102413689
What is the name of the Regulated Entity (RE)?	STRUCTURAL METAL
Does the RE site have a physical address?	No
Because there is no physical address, describe how to locate this site:	STEEL MILL ROAD OFF FARM-TO-MARKET ROAD 1620
City	SEGUIN
State	TX
ZIP	78155
County	GUADALUPE
Latitude (N) (##.#####)	29.575555
Longitude (W) (-###.#####)	-98.0325
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)?	CN600129001
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Structural Metals, Inc.
Texas SOS Filing Number	9292700
Federal Tax ID	742195234
State Franchise Tax ID	17410709657
State Sales Tax ID	

Local Tax ID	
DUNS Number	7324924
Number of Employees	501+
Independently Owned and Operated?	

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	Structural Metals Inc
Prefix	MR
First	John
Middle	C
Last	Walker
Suffix	
Credentials	
Title	Director of Operations
Enter new address or copy one from list:	RE Physical Address
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	1 STEEL MILL DR
Routing (such as Mail Code, Dept., or Attn:)	
City	SEGUIN
State	TX
ZIP	78155
Phone (###-###-####)	8303728500
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	Cole.Walker@CMC.COM

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.	RANDALL WALKER(STRUCTURAL META...)
Organization Name	STRUCTURAL METALS INC
Prefix	MR
First	RANDALL
Middle	
Last	WALKER
Suffix	
Credentials	
Title	ENVIRONMENTAL MANAGER CENTRAL REGION
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic

Mailing Address (include Suite or Bldg. here, if applicable)	1 STEEL MILL DR
Routing (such as Mail Code, Dept., or Attn:)	
City	SEGUIN
State	TX
ZIP	78155
Phone (###-###-####)	8303728507
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	8303728502
E-mail	randall.walker@cmc.com

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	29 Deg 34 Min 32 Sec
3) Permit Longitude Coordinate:	98 Deg 1 Min 57 Sec
4) Is this submittal a new application or an update to an existing application?	New Application
4.1. What type of permitting action are you applying for?	Renewal
4.1.1. Are there any permits that should be voided upon issuance of this permit application through permit conversion?	No
4.1.2. Are there any permits that should be voided upon issuance of this permit application through permit consolidation?	No
5) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

[File Properties]

File Name	OP-1.pdf
Hash	43C05DD3368F1DFE09FC1319A0C65F94E0A841B2BFA4E522C77A6185D7F9D613
MIME-Type	application/pdf

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

[File Properties]

File Name	OP-2.pdf
Hash	B936B5F398BA85DE40C7D9DED7886CBCA10FE282DC655E6D9AD831DDAEADC288
MIME-Type	application/pdf

Attach OP-ACPS (Application Compliance Plan and Schedule)

[File Properties]

File Name	OP-ACPS.pdf
Hash	D12EE81023079A16F438460D038AF25AD2D0F541A598843C02357E29F46CCD17
MIME-Type	application/pdf

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

[File Properties]

File Name	OP-REQ1.pdf
Hash	7D0DDE28A469344D9903E3CE262B56A3F3F86594B3CA13D97E206FCFD69184E5
MIME-Type	application/pdf

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

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

Attach OP-CRO2 (Change of Responsible Official Information)

[File Properties]

File Name	OP_CRO2_OPCRO2 - John C Walker.pdf
Hash	3C609F48FA46CBB26D39E22455735D77E30C01DB430AD70BEC203519D28B28E4
MIME-Type	application/pdf

Attach OP-DEL (Delegation of Responsible Official)

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name	CMC Segiun Title V Renewal Cover.pdf
Hash	4D67166EE689A2260948BB80436C95F098575FE9210AA0C7F5C50C2C4AD06DC7
MIME-Type	application/pdf

[File Properties]

File Name	Core Data Form - Signed.pdf
Hash	5AFF30D902769F9F871C3AC84FAC09E5CCD6DFF6A1FD3EC70E6C9F677075A926
MIME-Type	application/pdf

[File Properties]

File Name	OPCRO1 Title V Renewal.pdf
Hash	43DD683FA4E6A4CCABDD9DC42FAC0CFE80CDF48290FCBB4BB8CA62F3FF5980AB
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 John C Walker, the owner of the STEERS account ER116849.
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 1316.
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: John C Walker OWNER OPERATOR

Account Number:	ER116849
Signature IP Address:	170.85.100.171
Signature Date:	2025-10-10
Signature Hash:	DE43B458ADCE39EB5892E15F9AC8ADE71F9F00D51167D10515D831E885B70A9C
Form Hash Code at time of Signature:	7CC9765F1D67C9945D69CB345EBBCB82BEB7B0A368BE747E4F143DF52F4923BD

Submission

Reference Number:	The application reference number is 822645
Submitted by:	The application was submitted by ER116849/John C Walker
Submitted Timestamp:	The application was submitted on 2025-10-10 at 08:14:37 CDT
Submitted From:	The application was submitted from IP address 170.85.100.171
Confirmation Number:	The confirmation number is 684315
Steers Version:	The STEERS version is 6.93
Permit Number:	The permit number is 1316

Additional Information

Application Creator: This account was created by Jon W Greene



October 1, 2025

Air Permits Division MC-163
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

Subject: Title V Renewal Application
Permit O1316
Area Name: SMI-Texas
CN 600129001 RN 102413689
Structural Metals, Inc.

Dear Air Permits Division:

On behalf of Commercial Metals Company (CMC), Civil & Environmental Consultants, Inc. (CEC) submits this renewal application for Permit No. O1316 for the SMI-Texas facility located in Seguin, Texas. No changes have been made in the five years since the permit was last renewed. It should be noted that there is a change in Responsible Official (RO) from Mr. William VanderWaal to Mr. John C. Walker. Form OP-CRO2 is included with this submittal to request this change, and Form OP-CRO1 includes Mr. Walker's signature and certification as the new RO. As provided in Form OP-1, the Responsible Official and Technical Contact for this project are as follows:

Responsible Official	Technical Contact
John C. Walker	Randall Walker, P.E.
Director of Operations	Central Division Environmental Manager
1 Steel Mill Dr.	1 Steel Mill Dr.
Seguin, Texas 78155	Seguin, Texas 78155
830-372-8500	830-372-8507
Cole.Walker@cmc.com	Randall.Walker@cmc.com

Please feel free to contact me at 512-709-6177 or jgreene@cecinc.com if you require additional information regarding this permit renewal application.

Sincerely,

CIVIL & ENVIRONMENTAL CONSULTANTS, INC.

Jon Greene, P.E.
Senior Project Manager