



**ENVIRONMENTAL SERVICES**

P.O. Box 40

Paris, Texas

Tel: 903.782.1263

December 9, 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: **Federal Operating Permit Renewal**  
**Permit No. O-01781**  
**Silgan Containers Manufacturing Corporation, Paris, Texas**  
**Lamar County**  
**Account No. LA-0183-P**  
**Regulated Entity Number: RN100225374**  
**Customer Reference Number: CN600132013**

Enclosed please find the final form OP-CRO1 as requested by TCEQ for the renewal application of Federal Operating Permit No. O-01781 for Silgan Containers Manufacturing Corporation.

If you need additional information or have any questions regarding this submittal, please contact me at 903-782-1263.

A handwritten signature in black ink, appearing to be "D. Michael Huff".

D. Michael Huff  
Air Compliance Manager

cc: Mr. James Berry - Paris  
File: 751.1.22

TCEQ Region 5  
2916 Teague Drive  
Tyler, TX 75701-3734

USEPA  
R6AirPermitsTX@epa.gov

**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: 100225374	
CN: 60360721	
Account No.: LA-0183-P	
Permit No.: O1781	
Project No.:	
Area Name: Paris Plant	
Company Name: Silgan Containers Manufacturing Corporation	
<b>II. Certification Type</b> <i>(Please mark appropriate box)</i>	
<input checked="checked" type="checkbox"/> Responsible Official Representative	<input type="checkbox"/> Duly Authorized Representative
<b>III. Submittal Type</b> <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>	
<input type="checkbox"/> SOP/TOP Initial Permit Application	<input type="checkbox"/> Permit Revision, Renewal, or Reopening
<input type="checkbox"/> GOP Initial Permit Application	<input checked="checked" type="checkbox"/> Update to Permit Application
<input type="checkbox"/> Other:	

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

**IV. Certification of Truth**

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

I, James Berry 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 10/10/2025 to 12/08/2025  
(Start Date) (End Date)

Specific Dates: \_\_\_\_\_  
(Date 1) (Date 2) (Date 3) (Date 4)

\_\_\_\_\_  
(Date 5) (Date 6)

Signature:  Signature Date: 12/9/2025

Title: Plant Manager

**From:** Mike Huff <mhuff@silgancontainers.com>  
**Sent:** Tuesday, December 9, 2025 12:55 PM  
**To:** Ifeoluwa Babarinde  
**Cc:** John Walker  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant  
**Attachments:** 751 25 Title V Renewal Final OP-CRO1 Submittal signed.pdf

See attached.

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <Ifeoluwa.Babarinde@tceq.texas.gov>  
**Sent:** Tuesday, December 9, 2025 9:17 AM  
**To:** Mike Huff <mhuff@silgancontainers.com>  
**Cc:** John Walker <John.Walker@tceq.texas.gov>  
**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Mr. Huff,

The Form OP-PBRSUP submittal was received yesterday, 12/08/2025, and appears to be completed and acceptable. However, you will need to submit a final certified Form OP-CRO1 for all the dates that require certification.

Please submit Form OP-CRO1 to certify all emails and application updates. A time period of **10/10/2025 to 12/08/2025** should be used and the Submittal Type should be marked: Update to Permit Application. Please provide an electronic copy of the form followed by a hard copy. Please submit the requested information by the end of the business day today, **12/09/2025**.

Please let me know if you have any questions.

Thank you.

Sincerely,



*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087**

[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)

[\(512\) 239-3373](tel:(512)239-3373)



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December 9, 2025

Texas Commission on Environmental Quality  
Air Permits Initial Review Team (APIRT)  
MC-161  
12100 Park 35 Circle, Building C, Third Floor  
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Re: **Federal Operating Permit Renewal**  
**Permit No. O-01781**  
**Silgan Containers Manufacturing Corporation, Paris, Texas**  
**Lamar County**  
**Account No. LA-0183-P**  
**Regulated Entity Number: RN100225374**  
**Customer Reference Number: CN600132013**

Enclosed please find the final form OP-CRO1 as requested by TCEQ for the renewal application of Federal Operating Permit No. O-01781 for Silgan Containers Manufacturing Corporation.

If you need additional information or have any questions regarding this submittal, please contact me at 903-782-1263.

A handwritten signature in black ink, appearing to be "D. Michael Huff".

D. Michael Huff  
Air Compliance Manager

cc: Mr. James Berry - Paris  
File: 751.1.22

TCEQ Region 5  
2916 Teague Drive  
Tyler, TX 75701-3734

USEPA  
R6AirPermitsTX@epa.gov

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**Certification by Responsible Official**  
**Federal Operating Permit Program**  
**Texas Commission on Environmental Quality**

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<b>I. Identifying Information</b>	
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CN: 60360721	
Account No.: LA-0183-P	
Permit No.: O1781	
Project No.:	
Area Name: Paris Plant	
Company Name: Silgan Containers Manufacturing Corporation	
<b>II. Certification Type</b> <i>(Please mark appropriate box)</i>	
<input checked="checked" type="checkbox"/> Responsible Official Representative	<input type="checkbox"/> Duly Authorized Representative
<b>III. Submittal Type</b> <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>	
<input type="checkbox"/> SOP/TOP Initial Permit Application	<input type="checkbox"/> Permit Revision, Renewal, or Reopening
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<input type="checkbox"/> Other:	

**Form OP-CRO1**  
**Certification by Responsible Official**  
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**Texas Commission on Environmental Quality**

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I, James Berry 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:

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Specific Dates: \_\_\_\_\_  
(Date 1) (Date 2) (Date 3) (Date 4)

\_\_\_\_\_  
(Date 5) (Date 6)

Signature:  Signature Date: 12/9/2025

Title: Plant Manager

**From:** Ifeoluwa Babarinde  
**Sent:** Tuesday, December 9, 2025 9:17 AM  
**To:** Mike Huff  
**Cc:** John Walker  
**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Mr. Huff,

The Form OP-PBR SUP submittal was received yesterday, 12/08/2025, and appears to be completed and acceptable. However, you will need to submit a final certified Form OP-CRO1 for all the dates that require certification.

Please submit Form OP-CRO1 to certify all emails and application updates. A time period of 10/10/2025 to 12/08/2025 should be used and the Submittal Type should be marked: Update to Permit Application. Please provide an electronic copy of the form followed by a hard copy. Please submit the requested information by the end of the business day today, **12/09/2025.**

Please let me know if you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
[\(512\) 239-3373](tel:(512)239-3373)**



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**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
12/08/2025	q	100225374

Unit ID No.	PBR No.	Version No./Date
ES-2400	106.473	9/4/2000
ES-2500	106.473	9/4/2000
ES-3140	106.474	9/4/2000
ES-005	106.454	11/1/2001
ES-004	106.261	11/1/2003
ES-003	106.263	11/1/2001
ES-001	106.227	9/4/2000
ES-002	106.265	9/4/2000
ES-2130	51	9/13/1993

**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
12/08/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
ES-2400	106.473	9/4/2000	Uncontrolled Emissions less than 25 tpy
			Loading rate not to exceed 20,000 gal/day over consecutive 30-day period
			Capacity of tank not to exceed 25,000 gallons
			Maintain records of materials stored
			Recordkeeping as required by 30 TAC 106.4
			Recordkeeping as required by 30 TAC 106.8

**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
12/08/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
ES-2500	106.473	9/4/2000	Uncontrolled Emissions less than 25 tpy
			Loading rate not to exceed 20,000 gal/day over consecutive 30-day period
			Capacity of tank not to exceed 25,000 gallons
			Maintain records of materials stored
			Recordkeeping as required by 30 TAC 106.4
			Recordkeeping as required by 30 TAC 106.8



**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
12/08/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
ES-3140	106.474	9/4/2000	Maintain records of materials stored.
			Maintain records of SDS showing acid strength
ES-005	106.454	11/1/2001	Maintain records of total solvent makeup
			Maintain records of solvent disposal
			Maintain records of solvent materials used
			Maintain records of all degreaser maintenance activities
			Maintain records of SDS showing vapor pressure

**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
12/08/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
ES-004	106.261	11/1/2003	Maintain records of emissions in pounds per hour and tons per year for all
			listed materials.
			Maintain records of all new or increased emissions of any chemical having a
			limit value greater than 200 mg/m3.
			Maintain records of visible emissions.
			Recordkeeping as required by 30 TAC 106.4
			Recordkeeping as required by 30 TAC 106.8

**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
12/08/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
ES-003	106.263	11/1/2001	Maintain records containing sufficient information to demonstrate compliance
			and must be separate and distinct records from records maintained for any
			other air authorization.
			Records for all maintenance, start-up or shutdown activities and temporary
			facilities must identify: 1) type and reason for the activity; 2) processes and
			equipment involved; 3) time, date and duration of the activity; 4) the air
			contaminants and amounts which are emitted as a result of the activity.
ES-001	106.227	106.227	Maintain records of emissions of lead, when applicable
ES-002	106.265	9/4/2000	Recordkeeping as required by 30 TAC 106.4
			Recordkeeping as required by 30 TAC 106.8

**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
12/08/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
ES-2130	51	9/13/1993	Maintain records of materials loaded or unloaded
			Recordkeeping as required by 30 TAC 106.4
			Recordkeeping as required by 30 TAC 106.8

**From:** Mike Huff <mhuff@silgancontainers.com>  
**Sent:** Monday, December 8, 2025 5:20 PM  
**To:** Ifeoluwa Babarinde  
**Cc:** John Walker  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant  
**Attachments:** 751 25 Title V Renewal Application Form OP-PBRSUP Table B update2.pdf;  
751 25 Title V Renewal Application Form OP-PBRSUP Table D - Update 2.pdf

See attached

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <Ifeoluwa.Babarinde@tceq.texas.gov>  
**Sent:** Monday, December 8, 2025 2:41 PM  
**To:** Mike Huff <mhuff@silgancontainers.com>  
**Cc:** John Walker <John.Walker@tceq.texas.gov>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Mr. Huff,

The Form OP-PBRSUP submittal looks fine except for the documented date on the form. Please resubmit the updated Form OP-PBRSUP Tables B and D with today's date documented on all pages.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality**

MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Sent:** Monday, December 8, 2025 12:25 PM  
**To:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

See attached updated Forms B and D. The below items have been removed as they are no longer applicable to the facility.

PBR 375  
PBR 262  
PBR 472  
SE 106

#### **D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Sent:** Monday, December 8, 2025 11:18 AM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>; Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good Morning,

If that is the case, you may remove them from Form OP-PBRSUP. In your email response with the updated Form OP-PBRSUP, please also state that the PBRs and SE should be removed from the Title V permit.

Please remember that any PBRs that are documented as a Preconstruction Authorization (PCA) for any unit listed in the permit should be documented on Form OP-PBRSUP. If the PCA needs to be updated in the permit for any unit, please provide that updated information.

Please let me know if you have any additional questions.

Sincerely,

**John Walker**

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)

Phone: (512) 239-1277



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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Sent:** Monday, December 8, 2025 11:12 AM

**To:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>

**Cc:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

In looking at these more closely, there are a number of the PBRs and one SE that are no longer applicable. Should I now just delete or not include those in the list?

Thanks,

**D. Michael Huff**

Air Compliance Manager

Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

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**From:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Sent:** Monday, December 8, 2025 8:16 AM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>; Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good Morning Micheal,

I spoke about this issue with our manager Rhyan Stone last Friday and he stated that you will need to provide an updated Form OP-PBRSUP. He stated we have not allowed "site wide" as the Unit ID on Form OP-PBRSUP in the past and you will need to identify the specific units.

Please provide the updated Form OP-PBRSUP by close of business today, 12/08/2025.

Please let us know if you have any other questions.

Sincerely,

**John Walker**

Team Leader

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)

Phone: (512) 239-1277



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**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Sent:** Sunday, December 7, 2025 7:14 PM  
**To:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

John,  
Mark Meyer told me to use "Site-Wide" for any unit ID was not specifically listed in the permit. If you still need me to change the forms, please let me know,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

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**From:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Sent:** Friday, December 5, 2025 3:06 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>; Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good Afternoon Micheal,

I have a few comments on the Form OP-PBRUP Tables B and D provided.

1. "Site Wide" was listed for many of the Unit IDs. We have not allowed "Site Wide" as a Unit ID in the past. If there are no Unit IDs from the Title V permit to use, you may create your own Unit ID that represents how the site documents the unit.
2. For Standard Exemption (SE) 51, you have entered "Site Wide" as the Unit ID but Unit ID ES-2130 is documented as being authorized by SE 51 in the Title V draft permit. Please add the Unit ID "ES-2130" in place of "Site-wide" or confirm any other the necessary changes.

3. Please update the date in the top left of the form pages to reflect the submittal date (12/05/2025).

Please provide the requested information by close of business today, **12/05/2025**.

Please let me know if you have any questions.

Sincerely,

**John Walker**

Team Leader

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)

Phone: (512) 239-1277



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**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Sent:** Friday, December 5, 2025 2:40 PM

**To:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>

**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,

Please find attached the update Forms B and D.

**D. Michael Huff**

Air Compliance Manager

Silgan Containers Manufacturing Corporation

P.O. Box 40

Paris, TX 75461

(w) 903-782-1263  
(m) 903-249-0111

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**From:** Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>  
**Sent:** Tuesday, December 2, 2025 4:47 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good afternoon,

During the final review for issuance of the renewal application for Silgan Containers Manufacturing Corporation, associated with Site Operating Permit (SOP) O1781 for their Paris Plant, the following items surfaced which require additional information and/or documentation. Please provide your responses and the requested information and/or documentation as appropriate, at your earliest opportunity, but please no later than **12/03/2025:**

1. The submitted Form OP-PBRSUP, contains several discrepancies. Please submit an updated Form OP-PBRSUP to addresses the following issues:
  - More than one Permit by Rule (PBR) was listed in the first row. Each individual PBR should be listed on a separate row with the corresponding version dates listed in the column directly in front of the associated PBR.
  - The version dates listed for all the PBRs do not appear to be accurate compared to the TCEQ database. Version dates typically reflect the most recent effective date of the specific section of 30 TAC Chapter 106 under which the PBR was authorized. The effective version date format is usually (MM/DD/YYYY).
  - PBR 106.263 appears three separate times on different rows with some combinations of letters and numbers added to it. Please correct these errors so that PBR 106.263 is listed only once and ensure that any additional or incorrect characters are removed. The correct format for listing PBRs is generally 106.XXX with no letters or extra numbers appended.
  - Any units listed in the New Source Review Authorization References by Emissions Unit Table on page 12 of the Draft SOP that have PBRs as Preconstruction Authorizations should be documented on Table A (for registered PBRs) or

Table B (for claimed PBRs) and Table D. The recently submitted form includes only Table C.

2. The currently authorized Responsible Official (RO) for the facility is Kerry Wild. However, the application appears to have been certified by James Berry as the RO. Please note that only the individual officially authorized as the RO or DAR is permitted to certify any application and related submittals. If you need a change of the Responsible Official, please submit an OP-CRO2. Please provide an electronic copy of the form followed by a hardcopy with a wet-ink signature.

As a reminder, application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO or DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. However, application updates that are provided through email or physical mail will require certification using an original signature OP-CRO1. I will request the final OP-CRO1 submittal at the proper time.

Please be sure to notify me whenever any updates are submitted via STEERS.

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

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
[\(512\) 239-3373](tel:(512)239-3373)**



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**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Sent:** Wednesday, November 26, 2025 10:50 AM  
**To:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,  
Attached please find the OP-PBRSUP along with a signed OP-CRO1.

I completely misread your email requesting this information by 11/24/2025. I was traveling last week for some reason thought it was 12/01/2025.

If you need anything additional please let me know,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Sent:** Monday, November 17, 2025 3:14 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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

Mr. Huff,

Thank you for your response.

Management has advised me that TCEQ has determined this renewal application as untimely as it was not submitted via STEERS 6-18 months prior to the expiration date of FOP O1781. The official received date is 10/10/2025. Please refer to the March 1, 2024, announcement stating that after January 1, 2023, for an application to be considered submitted, it must be submitted in STEERS. Please see the announcement at the following link: [Announcements for Title V Operating Permits - Texas Commission on Environmental Quality - www.tceq.texas.gov](https://www.tceq.texas.gov/announcements/Title-V-Operating-Permits)

To issue this renewal project before the effective permit expires to avoid any non-compliance situations, please ensure that all requested information is provided by the requested due date/s. Also, the public notice and sign postings need to be published/posted as indicated below.

Accordingly, we are doing everything we can to help make sure the renewal is issued by the March 10, 2026 expiration date. To meet this date, the related English public notice and sign postings must be published/posted as soon as possible after the issuance of the Public Notice Authorization Package (PNAP), but no later than December 17, 2025. We plan to issue the PNAP as soon as possible but no later than December 3, 2025.

Please provide Form OP-PBR SUP at your earliest opportunity, but please no later than **11/24/2025**.

Also, the attachment you provided as the updated Form OP-1 still contained a “blank” Section X. Please include an updated Form OP-1 Section X with the Form OP-PBR SUP.

Yes, Form OP-PBR SUP, as well as all changes/updates made since the original renewal application, will need to be certified. I will request the final Form OP-CRO1 once the project has completed our internal QAQC process. I plan on sending the project to QAQC the day after receiving Forms OP-PBR SUP and OP-. Please be prepared to provide the final Form OP-CRO1 a day or two following the request.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality**

**MC-163, P.O. Box 13087**  
**Austin, TX 78711-3087**  
[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
[\(512\) 239-3373](tel:(512)239-3373)



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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Sent:** Friday, November 14, 2025 4:50 PM  
**To:** Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,  
Sorry for the delay in responding, I have been out of the office for the past 2 weeks returning yesterday and did not yet see your email until now. The application was submitted on August 5, 2025 within the required time frame. I previously provided the proof of submittal to the apirt email address at the request of Sean Wheeler of TCEQ.

I have no issues with the WPD.

For Item 1 below, yes, the 3/23/2023 is the correct issuance date.

For Item 2, regarding the OP-PBRSUP, I will be traveling for business on Monday but will get that completed to you ASAP. Can you verify that a new OP-CRO1 will be required with the OP-PBRSUP.

For Item 3 regarding OP-1, I am not sure why it was blank unless it was due to the merger of pdf files. Attached is the completed Form.

If you need anything additional, please let me know,

**D. Michael Huff**  
Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461

(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Sent:** Wednesday, November 5, 2025 2:40 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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

Good afternoon,

I have been assigned the submitted renewal application for Silgan Containers Manufacturing Corporation, associated with Site Operating Permit (SOP) O1781 for their Paris Plant. The application has been assigned Project No. 39229. The application is untimely as it was submitted on October 10, 2025, less than 6 months from the March 10, 2026, permit expiration.

I have completed the technical review and attached is the Working Draft Permit (WDP) for your review and approval, and/or comments. During the technical review process, the following items surfaced which must be addressed:

- 1) The indicated issuance date for NSR 21720 on the submitted Form OP-REQ1 is 8/1/2013. The NSR database indicates a renewal was issued 3/23/2023 (Project 352677). The 3/23/2023 issuance date appears to be the correct date to reference in the SOP as part of this renewal project. Please confirm if 3/23/2023 should be used as the issuance date for NSR 21720. Please note the related permit face, conditions, and MAERT associated with the 3/23/2023 issuance of the NSR 21720 renewal were provided as part of the SOP renewal application package.
- 2) The NSR database indicates the site has several active claimed Permit by Rule (PBRs) and claimed Standard Exemptions (SEs) being utilized at the site. As of August 1, 2020, Form OP-PBRSUP is required for all SOP renewal applications. It does not appear this form was submitted as part of the renewal application. Please submit a completed Form OP-PBRSUP (form is attached for convenience). Please note that all four Tables must be submitted and any PBR and/or SE that is listed on either Table A and/or Table B, must be also listed on Table D.
- 3) The submitted Form OP-1 Section X. contained no responses. Please submit an updated Form OP-1 (form is attached for convenience) with proper responses, as applicable, to Section X. questions A. – L.



Please provide your approval and/or comments to the WDP, and the requested updated forms as soon as possible but no later than **close of business on Monday, November 10, 2025**. Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

If you are unable to submit the requested updates via STEERS, please be advised that an OP-CRO1 must also be provided to certify all these changes. If you are unable to provide updates in STEERS, please provide the signed document via email attachment and then follow-up with providing the original, wet-ink Form OP-CRO1 document via overnight delivery.

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

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

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

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. 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 were 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](#).

Finally, per the note provided on the cover letter for this renewal application "...the Paris plant is scheduled to be closed and permanently shutdown as of June 30, 2026", please be advised that once this renewal is issued and the site is shutdown, a Void application will need to be submitted via STEERS for SOP No. O1781.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
(512) 239-3373**



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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
12/08/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
ES-2400	106.473	9/4/2000	Uncontrolled Emissions less than 25 tpy
			Loading rate not to exceed 20,000 gal/day over consecutive 30-day period
			Capacity of tank not to exceed 25,000 gallons
			Maintain records of materials stored
			Recordkeeping as required by 30 TAC 106.4
			Recordkeeping as required by 30 TAC 106.8

**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
12/08/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
ES-2500	106.473	9/4/2000	Uncontrolled Emissions less than 25 tpy
			Loading rate not to exceed 20,000 gal/day over consecutive 30-day period
			Capacity of tank not to exceed 25,000 gallons
			Maintain records of materials stored
			Recordkeeping as required by 30 TAC 106.4
			Recordkeeping as required by 30 TAC 106.8

**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
12/08/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
ES-3140	106.474	9/4/2000	Maintain records of materials stored.
			Maintain records of SDS showing acid strength
ES-005	106.454	11/1/2001	Maintain records of total solvent makeup
			Maintain records of solvent disposal
			Maintain records of solvent materials used
			Maintain records of all degreaser maintenance activities
			Maintain records of SDS showing vapor pressure

**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
12/08/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
ES-004	106.261	11/1/2003	Maintain records of emissions in pounds per hour and tons per year for all
			listed materials.
			Maintain records of all new or increased emissions of any chemical having a
			limit value greater than 200 mg/m3.
			Maintain records of visible emissions.
			Recordkeeping as required by 30 TAC 106.4
			Recordkeeping as required by 30 TAC 106.8

**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
12/08/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
ES-003	106.263	11/1/2001	Maintain records containing sufficient information to demonstrate compliance
			and must be separate and distinct records from records maintained for any
			other air authorization.
			Records for all maintenance, start-up or shutdown activities and temporary
			facilities must identify: 1) type and reason for the activity; 2) processes and
			equipment involved; 3) time, date and duration of the activity; 4) the air
			contaminants and amounts which are emitted as a result of the activity.
ES-001	106.227	106.227	Maintain records of emissions of lead, when applicable
ES-002	106.265	9/4/2000	Recordkeeping as required by 30 TAC 106.4
			Recordkeeping as required by 30 TAC 106.8

**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
12/08/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
ES-2130	51	9/13/1993	Maintain records of materials loaded or unloaded
			Recordkeeping as required by 30 TAC 106.4
			Recordkeeping as required by 30 TAC 106.8



**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
12/08/2025	q	100225374

Unit ID No.	PBR No.	Version No./Date
ES-2400	106.473	9/4/2000
ES-2500	106.473	9/4/2000
ES-3140	106.474	9/4/2000
ES-005	106.454	11/1/2001
ES-004	106.261	11/1/2003
ES-003	106.263	11/1/2001
ES-001	106.227	9/4/2000
ES-002	106.265	9/4/2000
ES-2130	51	9/13/1993

**From:** Ifeoluwa Babarinde  
**Sent:** Monday, December 8, 2025 2:41 PM  
**To:** Mike Huff  
**Cc:** John Walker  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Mr. Huff,

The Form OP-PBRSUP submittal looks fine except for the documented date on the form. Please resubmit the updated Form OP-PBRSUP Tables B and D with today's date documented on all pages.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
(512) 239-3373**



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---

**From:** Mike Huff <mhuff@silgancontainers.com>  
**Sent:** Monday, December 8, 2025 12:25 PM  
**To:** John Walker <John.Walker@tceq.texas.gov>; Ifeoluwa Babarinde <Ifeoluwa.Babarinde@tceq.texas.gov>  
**Cc:** Mark Meyer <Mark.Meyer@tceq.texas.gov>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

See attached updated Forms B and D. The below items have been removed as they are no longer applicable to the facility.

PBR 375  
PBR 262  
PBR 472  
SE 106

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Sent:** Monday, December 8, 2025 11:18 AM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>; Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good Morning,

If that is the case, you may remove them from Form OP-PBRSUP. In your email response with the updated Form OP-PBRSUP, please also state that the PBRs and SE should be removed from the Title V permit.

Please remember that any PBRs that are documented as a Preconstruction Authorization (PCA) for any unit listed in the permit should be documented on Form OP-PBRSUP. If the PCA needs to be updated in the permit for any unit, please provide that updated information.

Please let me know if you have any additional questions.

Sincerely,

**John Walker**

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

Phone: (512) 239-1277



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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Sent:** Monday, December 8, 2025 11:12 AM  
**To:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

In looking at these more closely, there are a number of the PBRs and one SE that are no longer applicable. Should I now just delete or not include those in the list?

Thanks,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Sent:** Monday, December 8, 2025 8:16 AM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>; Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good Morning Micheal,

I spoke about this issue with our manager Rhyan Stone last Friday and he stated that you will need to provide an updated Form OP-PBRSUP. He stated we have not allowed "site wide" as the Unit ID on Form OP-PBRSUP in the past and you will need to identify the

specific units.

Please provide the updated Form OP-PBRSUP by close of business today, 12/08/2025.

Please let us know if you have any other questions.

Sincerely,

**John Walker**

Team Leader

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)

Phone: (512) 239-1277



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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Sent:** Sunday, December 7, 2025 7:14 PM

**To:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>

**Cc:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

John,

Mark Meyer told me to use "Site-Wide" for any unit ID was not specifically listed in the permit. If you still need me to change the forms, please let me know,

**D. Michael Huff**

Air Compliance Manager

Silgan Containers Manufacturing Corporation

P.O. Box 40

Paris, TX 75461

(w) 903-782-1263  
(m) 903-249-0111

---

**From:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Sent:** Friday, December 5, 2025 3:06 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>; Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good Afternoon Micheal,

I have a few comments on the Form OP-PBRSUP Tables B and D provided.

1. "Site Wide" was listed for many of the Unit IDs. We have not allowed "Site Wide" as a Unit ID in the past. If there are no Unit IDs from the Title V permit to use, you may create your own Unit ID that represents how the site documents the unit.
2. For Standard Exemption (SE) 51, you have entered "Site Wide" as the Unit ID but Unit ID ES-2130 is documented as being authorized by SE 51 in the Title V draft permit. Please add the Unit ID "ES-2130" in place of "Site-wide" or confirm any other the necessary changes.
3. Please update the date in the top left of the form pages to reflect the submittal date (12/05/2025).

Please provide the requested information by close of business today, **12/05/2025.**

Please let me know if you have any questions.

Sincerely,

**John Walker**  
Team Leader  
OA/Air Permits Division/OP Section  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)

Phone: (512) 239-1277



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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Sent:** Friday, December 5, 2025 2:40 PM  
**To:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,  
Please find attached the update Forms B and D.

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Sent:** Tuesday, December 2, 2025 4:47 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good afternoon,

During the final review for issuance of the renewal application for Silgan Containers Manufacturing Corporation, associated with Site Operating Permit (SOP) O1781 for their Paris Plant, the following items surfaced which require additional information and/or documentation. Please provide your responses and the requested information and/or documentation as appropriate, at your earliest opportunity, but please no later than **12/03/2025:**

1. The submitted Form OP-PBRSUP, contains several discrepancies. Please submit an updated Form OP-PBRSUP to addresses the following issues:
  - More than one Permit by Rule (PBR) was listed in the first row. Each individual PBR should be listed on a separate row with the corresponding version dates listed in the column directly in front of the associated PBR.
  - The version dates listed for all the PBRs do not appear to be accurate compared to the TCEQ database. Version dates typically reflect the most recent effective date of the specific section of 30 TAC Chapter 106 under which the PBR was authorized. The effective version date format is usually (MM/DD/YYYY).
  - PBR 106.263 appears three separate times on different rows with some combinations of letters and numbers added to it. Please correct these errors so that PBR 106.263 is listed only once and ensure that any additional or incorrect characters are removed. The correct format for listing PBRs is generally 106.XXX with no letters or extra numbers appended.
  - Any units listed in the New Source Review Authorization References by Emissions Unit Table on page 12 of the Draft SOP that have PBRs as Preconstruction Authorizations should be documented on Table A (for registered PBRs) or Table B (for claimed PBRs) and Table D. The recently submitted form includes only Table C.
2. The currently authorized Responsible Official (RO) for the facility is Kerry Wild. However, the application appears to have been certified by James Berry as the RO. Please note that only the individual officially authorized as the RO or DAR is permitted to certify any application and related submittals. If you need a change of the Responsible Official, please submit an OP-CRO2. Please provide an electronic copy of the form followed by a hardcopy with a wet-ink signature.

As a reminder, application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO or DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. However, application updates that are provided through email or physical mail will require certification using an original signature OP-CRO1. I will request the final OP-CRO1 submittal at the proper time.

Please be sure to notify me whenever any updates are submitted via STEERS.



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

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087**

[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)

[\(512\) 239-3373](tel:(512)239-3373)



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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Sent:** Wednesday, November 26, 2025 10:50 AM

**To:** Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>

**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,

Attached please find the OP-PBRSUP along with a signed OP-CRO1.

I completely misread your email requesting this information by 11/24/2025. I was traveling last week for some reason thought it was 12/01/2025.

If you need anything additional please let me know,

## D. Michael Huff

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Sent:** Monday, November 17, 2025 3:14 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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

Mr. Huff,

Thank you for your response.

Management has advised me that TCEQ has determined this renewal application as untimely as it was not submitted via STEERS 6-18 months prior to the expiration date of FOP O1781. The official received date is 10/10/2025. Please refer to the March 1, 2024, announcement stating that after January 1, 2023, for an application to be considered submitted, it must be submitted in STEERS. Please see the announcement at the following link: [Announcements for Title V Operating Permits - Texas Commission on Environmental Quality - www.tceq.texas.gov](#)

To issue this renewal project before the effective permit expires to avoid any non-compliance situations, please ensure that all requested information is provided by the requested due date/s. Also, the public notice and sign postings need to be published/posted as indicated below.

Accordingly, we are doing everything we can to help make sure the renewal is issued by the March 10, 2026 expiration date. To meet this date, the related English public notice and sign postings must be published/posted as soon as possible after the issuance of the Public Notice Authorization Package (PNAP), but no later than December 17, 2025. We plan to issue the PNAP as soon as possible but no later than December 3, 2025.

Please provide Form OP-PBRSUP at your earliest opportunity, but please no later than **11/24/2025**.

Also, the attachment you provided as the updated Form OP-1 still contained a “blank” Section X. Please include an updated Form OP-1 Section X with the Form OP-PBRSUP.

Yes, Form OP-PBRSUP, as well as all changes/updates made since the original renewal application, will need to be certified. I will request the final Form OP-CRO1 once the project has completed our internal QAQC process. I plan on sending the project to QAQC the day after receiving Forms OP-PBRSUP and OP-. Please be prepared to provide the final Form OP-CRO1 a day or two following the request.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
(512) 239-3373**



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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Sent:** Friday, November 14, 2025 4:50 PM

**To:** Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>

**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,

Sorry for the delay in responding, I have been out of the office for the past 2 weeks returning yesterday and did not yet see your email until now. The application was submitted on August 5, 2025 within the required time frame. I previously provided the proof of submittal to the apirt email address at the request of Sean Wheeler of TCEQ.

I have no issues with the WPD.

For Item 1 below, yes, the 3/23/2023 is the correct issuance date.

For Item 2, regarding the OP-PBRSUP, I will be traveling for business on Monday but will get that completed to you ASAP. Can you verify that a new OP-CRO1 will be required with the OP-PBRSUP.

For Item 3 regarding OP-1, I am not sure why it was blank unless it was due to the merger of pdf files. Attached is the completed Form.

If you need anything additional, please let me know,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Sent:** Wednesday, November 5, 2025 2:40 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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

Good afternoon,

I have been assigned the submitted renewal application for Silgan Containers Manufacturing Corporation, associated with Site Operating Permit (SOP) O1781 for their Paris Plant. The application has been assigned Project No. 39229. The application is untimely as it was submitted on October 10, 2025, less than 6 months from the March 10, 2026, permit expiration.

I have completed the technical review and attached is the Working Draft Permit (WDP) for your review and approval, and/or comments. During the technical review process, the following items surfaced which must be addressed:

- 1) The indicated issuance date for NSR 21720 on the submitted Form OP-REQ1 is 8/1/2013. The NSR database indicates a renewal was issued 3/23/2023 (Project 352677). The 3/23/2023 issuance date appears to be the correct date to reference in the SOP as part of this renewal project. Please confirm if 3/23/2023 should be used as the issuance date for NSR 21720. Please note the related permit face, conditions, and MAERT associated with the 3/23/2023 issuance of the NSR 21720 renewal were provided as part of the SOP renewal application package.
- 2) The NSR database indicates the site has several active claimed Permit by Rule (PBRs) and claimed Standard Exemptions (SEs) being utilized at the site. As of August 1, 2020, Form OP-PBRSUP is required for all SOP renewal applications. It does not appear this form was submitted as part of the renewal application. Please submit a completed Form OP-PBRSUP (form is attached for convenience). Please note that all four Tables must be submitted and any PBR and/or SE that is listed on either Table A and/or Table B, must be also listed on Table D.
- 3) The submitted Form OP-1 Section X. contained no responses. Please submit an updated Form OP-1 (form is attached for convenience) with proper responses, as applicable, to Section X. questions A. – L.

Please provide your approval and/or comments to the WDP, and the requested updated forms as soon as possible but no later than **close of business on Monday, November 10, 2025**. Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

If you are unable to submit the requested updates via STEERS, please be advised that an OP-CRO1 must also be provided to certify all these changes. If you are unable to provide updates in STEERS, please provide the signed document via email attachment and then follow-up with providing the original, wet-ink Form OP-CRO1 document via overnight delivery.

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

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

- d. Accuracy of PBR information provided on the supplemental table and in the permit – please refer to Forms OP-PBRSUP and OP-REQ1 Instructions.

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

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. 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 were 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](#).

Finally, per the note provided on the cover letter for this renewal application "...the Paris plant is scheduled to be closed and permanently shutdown as of June 30, 2026", please be advised that once this renewal is issued and the site is shutdown, a Void application will need to be submitted via STEERS for SOP No. O1781.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087**

[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)

(512) 239-3373



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**From:** Ifeoluwa Babarinde  
**Sent:** Monday, December 8, 2025 1:21 PM  
**To:** Mark Meyer  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Thank you!

**Ifeoluwa Babarinde (x3373)**  
**Permit Reviewer – Title V**

---

**From:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Sent:** Monday, December 8, 2025 1:20 PM  
**To:** Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>  
**Subject:** FW: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant  
**Importance:** High

Ife,

I suggest the following:

Mr. Huff,

The submittal looks fine except for the indicated date on the form. Please submit updated Tables B and D to indicate today's date for all pages.

Thank you.

Mark Meyer  
Air Permits Division - Operating Permits  
Texas Commission on Environmental Quality  
512.239.0445  
**How is our customer service?** Fill out our online customer satisfaction survey at [www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Sent:** Monday, December 8, 2025 12:25 PM  
**To:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

See attached updated Forms B and D. The below items have been removed as they are no longer applicable to the facility.

PBR 375



PBR 262  
PBR 472  
SE 106

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Sent:** Monday, December 8, 2025 11:18 AM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>; Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good Morning,

If that is the case, you may remove them from Form OP-PBRSUP. In your email response with the updated Form OP-PBRSUP, please also state that the PBRs and SE should be removed from the Title V permit.

Please remember that any PBRs that are documented as a Preconstruction Authorization (PCA) for any unit listed in the permit should be documented on Form OP-PBRSUP. If the PCA needs to be updated in the permit for any unit, please provide that updated information.

Please let me know if you have any additional questions.

Sincerely,

**John Walker**

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

Phone: (512) 239-1277



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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Sent:** Monday, December 8, 2025 11:12 AM

**To:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>

**Cc:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

In looking at these more closely, there are a number of the PBRs and one SE that are no longer applicable. Should I now just delete or not include those in the list?

Thanks,

**D. Michael Huff**

Air Compliance Manager

Silgan Containers Manufacturing Corporation

P.O. Box 40

Paris, TX 75461

(w) 903-782-1263

(m) 903-249-0111

---

**From:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>

**Sent:** Monday, December 8, 2025 8:16 AM

**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>; Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>

**Cc:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good Morning Micheal,

I spoke about this issue with our manager Rhyann Stone last Friday and he stated that you will need to provide an updated Form OP-PBRSUP. He stated we have not allowed "site wide" as the Unit ID on Form OP-PBRSUP in the past and you will need to identify the specific units.

Please provide the updated Form OP-PBRSUP by close of business today, 12/08/2025.

Please let us know if you have any other questions.

Sincerely,

**John Walker**

Team Leader

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)

Phone: (512) 239-1277



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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Sent:** Sunday, December 7, 2025 7:14 PM

**To:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>

**Cc:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

John,

Mark Meyer told me to use "Site-Wide" for any unit ID was not specifically listed in the permit. If you still need me to change the forms, please let me know,

**D. Michael Huff**

Air Compliance Manager

Silgan Containers Manufacturing Corporation

P.O. Box 40

Paris, TX 75461

(w) 903-782-1263

(m) 903-249-0111

---

**From:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Sent:** Friday, December 5, 2025 3:06 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>; Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP 01781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good Afternoon Micheal,

I have a few comments on the Form OP-PBRUP Tables B and D provided.

1. "Site Wide" was listed for many of the Unit IDs. We have not allowed "Site Wide" as a Unit ID in the past. If there are no Unit IDs from the Title V permit to use, you may create your own Unit ID that represents how the site documents the unit.
2. For Standard Exemption (SE) 51, you have entered "Site Wide" as the Unit ID but Unit ID ES-2130 is documented as being authorized by SE 51 in the Title V draft permit. Please add the Unit ID "ES-2130" in place of "Site-wide" or confirm any other the necessary changes.
3. Please update the date in the top left of the form pages to reflect the submittal date (12/05/2025).

Please provide the requested information by close of business today, **12/05/2025.**

Please let me know if you have any questions.

Sincerely,

**John Walker**

Team Leader

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)

Phone: (512) 239-1277



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**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Sent:** Friday, December 5, 2025 2:40 PM  
**To:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,  
Please find attached the update Forms B and D.

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Sent:** Tuesday, December 2, 2025 4:47 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good afternoon,

During the final review for issuance of the renewal application for Silgan Containers Manufacturing Corporation, associated with Site Operating Permit (SOP) O1781 for their Paris Plant, the following items surfaced which require additional information and/or documentation. Please provide your responses and the requested information and/or documentation as appropriate, at your earliest opportunity, but please no later than **12/03/2025:**

1. The submitted Form OP-PBRSUP, contains several discrepancies. Please submit an updated Form OP-PBRSUP to addresses the following issues:
  - More than one Permit by Rule (PBR) was listed in the first row. Each individual PBR should be listed on a separate row with the corresponding version dates listed in the column directly in front of the associated PBR.
  - The version dates listed for all the PBRs do not appear to be accurate compared to the TCEQ database. Version dates typically reflect the most recent effective date of the specific section of 30 TAC Chapter 106 under which the PBR was authorized. The effective version date format is usually (MM/DD/YYYY).
  - PBR 106.263 appears three separate times on different rows with some combinations of letters and numbers added to it. Please correct these errors so that PBR 106.263 is listed only once and ensure that any additional or incorrect characters are removed. The correct format for listing PBRs is generally 106.XXX with no letters or extra numbers appended.
  - Any units listed in the New Source Review Authorization References by Emissions Unit Table on page 12 of the Draft SOP that have PBRs as Preconstruction Authorizations should be documented on Table A (for registered PBRs) or Table B (for claimed PBRs) and Table D. The recently submitted form includes only Table C.
2. The currently authorized Responsible Official (RO) for the facility is Kerry Wild. However, the application appears to have been certified by James Berry as the RO. Please note that only the individual officially authorized as the RO or DAR is permitted to certify any application and related submittals. If you need a change of the Responsible Official, please submit an OP-CRO2. Please provide an electronic copy of the form followed by a hardcopy with a wet-ink signature.

As a reminder, application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO or DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. However, application updates that are provided through email or physical mail will require certification using an original signature OP-CRO1. I will request the final OP-CRO1 submittal at the proper time.

Please be sure to notify me whenever any updates are submitted via STEERS.

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

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087**

[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)

[\(512\) 239-3373](tel:(512)239-3373)



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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Sent:** Wednesday, November 26, 2025 10:50 AM

**To:** Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>

**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,

Attached please find the OP-PBRSUP along with a signed OP-CRO1.

I completely misread your email requesting this information by 11/24/2025. I was traveling last week for some reason thought it was 12/01/2025.

If you need anything additional please let me know,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Sent:** Monday, November 17, 2025 3:14 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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

Mr. Huff,

Thank you for your response.

Management has advised me that TCEQ has determined this renewal application as untimely as it was not submitted via STEERS 6-18 months prior to the expiration date of FOP O1781. The official received date is 10/10/2025. Please refer to the March 1, 2024, announcement stating that after January 1, 2023, for an application to be considered submitted, it must be submitted in STEERS. Please see the announcement at the following link: [Announcements for Title V Operating Permits - Texas Commission on Environmental Quality - www.tceq.texas.gov](#)

To issue this renewal project before the effective permit expires to avoid any non-compliance situations, please ensure that all requested information is provided by the requested due date/s. Also, the public notice and sign postings need to be published/posted as indicated below.

Accordingly, we are doing everything we can to help make sure the renewal is issued by the March 10, 2026 expiration date. To meet this date, the related English public notice and sign postings must be published/posted as soon as possible after the issuance of the Public Notice Authorization Package (PNAP), but no later than December 17, 2025. We plan to issue the PNAP as soon as possible but no later than December 3, 2025.

Please provide Form OP-PBRUP at your earliest opportunity, but please no later than **11/24/2025**.



Also, the attachment you provided as the updated Form OP-1 still contained a “blank” Section X. Please include an updated Form OP-1 Section X with the Form OP-PBRSUP.

Yes, Form OP-PBRSUP, as well as all changes/updates made since the original renewal application, will need to be certified. I will request the final Form OP-CRO1 once the project has completed our internal QAQC process. I plan on sending the project to QAQC the day after receiving Forms OP-PBRSUP and OP-. Please be prepared to provide the final Form OP-CRO1 a day or two following the request.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
(512) 239-3373**



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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Sent:** Friday, November 14, 2025 4:50 PM  
**To:** Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,

Sorry for the delay in responding, I have been out of the office for the past 2 weeks returning yesterday and did not yet see your email until now. The application was submitted on August 5, 2025 within the required time frame. I previously provided the proof of submittal to the apirt email address at the request of Sean Wheeler of TCEQ.

I have no issues with the WPD.

For Item 1 below, yes, the 3/23/2023 is the correct issuance date.

For Item 2, regarding the OP-PBRSUP, I will be traveling for business on Monday but will get that completed to you ASAP. Can you verify that a new OP-CRO1 will be required with the OP-PBRSUP.

For Item 3 regarding OP-1, I am not sure why it was blank unless it was due to the merger of pdf files. Attached is the completed Form.

If you need anything additional, please let me know,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

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**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Sent:** Wednesday, November 5, 2025 2:40 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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

Good afternoon,

I have been assigned the submitted renewal application for Silgan Containers Manufacturing Corporation, associated with Site Operating Permit (SOP) O1781 for their Paris Plant. The application has been assigned Project No. 39229. The application is untimely as it was submitted on October 10, 2025, less than 6 months from the March 10, 2026, permit expiration.

I have completed the technical review and attached is the Working Draft Permit (WDP) for your review and approval, and/or comments. During the technical review process, the following items surfaced which must be addressed:

- 1) The indicated issuance date for NSR 21720 on the submitted Form OP-REQ1 is 8/1/2013. The NSR database indicates a renewal was issued 3/23/2023 (Project 352677). The 3/23/2023 issuance date appears to be the correct date to reference in the SOP as part of this renewal project. Please confirm if 3/23/2023 should be used as the issuance date for NSR 21720. Please note the related permit face, conditions, and MAERT associated with the 3/23/2023 issuance of the NSR 21720 renewal were provided as part of the SOP renewal application package.
- 2) The NSR database indicates the site has several active claimed Permit by Rule (PBRs) and claimed Standard Exemptions (SEs) being utilized at the site. As of August 1, 2020, Form OP-PBRSUP is required for all SOP renewal applications. It does not appear this form was submitted as part of the renewal application. Please submit a completed Form OP-PBRSUP (form is attached for convenience). Please note that all four Tables must be submitted and any PBR and/or SE that is listed on either Table A and/or Table B, must be also listed on Table D.
- 3) The submitted Form OP-1 Section X. contained no responses. Please submit an updated Form OP-1 (form is attached for convenience) with proper responses, as applicable, to Section X. questions A. – L.

Please provide your approval and/or comments to the WDP, and the requested updated forms as soon as possible but no later than **close of business on Monday, November 10, 2025**. Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

If you are unable to submit the requested updates via STEERS, please be advised that an OP-CRO1 must also be provided to certify all these changes. If you are unable to provide updates in STEERS, please provide the signed document via email attachment and then follow-up with providing the original, wet-ink Form OP-CRO1 document via overnight delivery.

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

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

- d. Accuracy of PBR information provided on the supplemental table and in the permit – please refer to Forms OP-PBRSUP and OP-REQ1 Instructions.

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

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. 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 were 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](#).

Finally, per the note provided on the cover letter for this renewal application "...the Paris plant is scheduled to be closed and permanently shutdown as of June 30, 2026", please be advised that once this renewal is issued and the site is shutdown, a Void application will need to be submitted via STEERS for SOP No. O1781.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087**

[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)

(512) 239-3373



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**From:** Mike Huff <mhuff@silgancontainers.com>  
**Sent:** Monday, December 8, 2025 12:25 PM  
**To:** John Walker; Ifeoluwa Babarinde  
**Cc:** Mark Meyer  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant  
**Attachments:** 751 25 Title V Renewal Application Form OP-PBRSUP Table B Update2.pdf;  
751 25 Title V Renewal Application Form OP-PBRSUP Table D - Update 2.pdf

See attached updated Forms B and D. The below items have been removed as they are no longer applicable to the facility.

PBR 375  
PBR 262  
PBR 472  
SE 106

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** John Walker <John.Walker@tceq.texas.gov>  
**Sent:** Monday, December 8, 2025 11:18 AM  
**To:** Mike Huff <mhuff@silgancontainers.com>; Ifeoluwa Babarinde <Ifeoluwa.Babarinde@tceq.texas.gov>  
**Cc:** Mark Meyer <Mark.Meyer@tceq.texas.gov>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good Morning,

If that is the case, you may remove them from Form OP-PBRSUP. In your email response with the updated Form OP-PBRSUP, please also state that the PBRs and SE should be removed from the Title V permit.

Please remember that any PBRs that are documented as a Preconstruction Authorization (PCA) for any unit listed in the permit should be documented on Form OP-PBRSUP. If the PCA needs to be updated in the permit for any unit, please provide that updated information.

Please let me know if you have any additional questions.

Sincerely,

**John Walker**

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)

Phone: (512) 239-1277



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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Sent:** Monday, December 8, 2025 11:12 AM

**To:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>

**Cc:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP 01781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

In looking at these more closely, there are a number of the PBRs and one SE that are no longer applicable. Should I now just delete or not include those in the list?

Thanks,

**D. Michael Huff**

Air Compliance Manager

Silgan Containers Manufacturing Corporation

P.O. Box 40

Paris, TX 75461

(w) 903-782-1263

(m) 903-249-0111

---

**From:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>

**Sent:** Monday, December 8, 2025 8:16 AM

**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>; Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>

**Cc:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good Morning Micheal,

I spoke about this issue with our manager Rhyan Stone last Friday and he stated that you will need to provide an updated Form OP-PBRSUP. He stated we have not allowed "site wide" as the Unit ID on Form OP-PBRSUP in the past and you will need to identify the specific units.

Please provide the updated Form OP-PBRSUP by close of business today, 12/08/2025.

Please let us know if you have any other questions.

Sincerely,

**John Walker**

Team Leader

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)

Phone: (512) 239-1277



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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Sent:** Sunday, December 7, 2025 7:14 PM

**To:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>

**Cc:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant



John,  
Mark Meyer told me to use “Site-Wide” for any unit ID was not specifically listed in the permit. If you still need me to change the forms, please let me know,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Sent:** Friday, December 5, 2025 3:06 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>; Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good Afternoon Micheal,

I have a few comments on the Form OP-PBRUP Tables B and D provided.

1. “Site Wide” was listed for many of the Unit IDs. We have not allowed “Site Wide” as a Unit ID in the past. If there are no Unit IDs from the Title V permit to use, you may create your own Unit ID that represents how the site documents the unit.
2. For Standard Exemption (SE) 51, you have entered “Site Wide” as the Unit ID but Unit ID ES-2130 is documented as being authorized by SE 51 in the Title V draft permit. Please add the Unit ID “ES-2130” in place of “Site-wide” or confirm any other the necessary changes.
3. Please update the date in the top left of the form pages to reflect the submittal date (12/05/2025).

Please provide the requested information by close of business today, **12/05/2025.**

Please let me know if you have any questions.

Sincerely,

**John Walker**  
Team Leader

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

Phone: (512) 239-1277



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**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Sent:** Friday, December 5, 2025 2:40 PM  
**To:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,  
Please find attached the update Forms B and D.

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Sent:** Tuesday, December 2, 2025 4:47 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good afternoon,

During the final review for issuance of the renewal application for Silgan Containers Manufacturing Corporation, associated with Site Operating Permit (SOP) O1781 for their Paris Plant, the following items surfaced which require additional information and/or documentation. Please provide your responses and the requested information and/or documentation as appropriate, at your earliest opportunity, but please no later than **12/03/2025:**

1. The submitted Form OP-PBRSUP, contains several discrepancies. Please submit an updated Form OP-PBRSUP to addresses the following issues:
  - More than one Permit by Rule (PBR) was listed in the first row. Each individual PBR should be listed on a separate row with the corresponding version dates listed in the column directly in front of the associated PBR.
  - The version dates listed for all the PBRs do not appear to be accurate compared to the TCEQ database. Version dates typically reflect the most recent effective date of the specific section of 30 TAC Chapter 106 under which the PBR was authorized. The effective version date format is usually (MM/DD/YYYY).
  - PBR 106.263 appears three separate times on different rows with some combinations of letters and numbers added to it. Please correct these errors so that PBR 106.263 is listed only once and ensure that any additional or incorrect characters are removed. The correct format for listing PBRs is generally 106.XXX with no letters or extra numbers appended.
  - Any units listed in the New Source Review Authorization References by Emissions Unit Table on page 12 of the Draft SOP that have PBRs as Preconstruction Authorizations should be documented on Table A (for registered PBRs) or Table B (for claimed PBRs) and Table D. The recently submitted form includes only Table C.
2. The currently authorized Responsible Official (RO) for the facility is Kerry Wild. However, the application appears to have been certified by James Berry as the RO. Please note that only the individual officially authorized as the RO or DAR is permitted to certify any application and related submittals. If you need a change of the Responsible Official, please submit an OP-CRO2. Please provide an electronic copy of the form followed by a hardcopy with a wet-ink signature.

As a reminder, application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO or DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. However, application updates that are provided through email or physical mail will require certification using an original signature OP-CRO1. I will request the final OP-CRO1 submittal at the proper time.

Please be sure to notify me whenever any updates are submitted via STEERS.

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

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
(512) 239-3373**



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**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Sent:** Wednesday, November 26, 2025 10:50 AM  
**To:** Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,

Attached please find the OP-PBRSUP along with a signed OP-CRO1.

I completely misread your email requesting this information by 11/24/2025. I was traveling last week for some reason thought it was 12/01/2025.

If you need anything additional please let me know,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Sent:** Monday, November 17, 2025 3:14 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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

Mr. Huff,

Thank you for your response.

Management has advised me that TCEQ has determined this renewal application as untimely as it was not submitted via STEERS 6-18 months prior to the expiration date of FOP O1781. The official received date is 10/10/2025. Please refer to the March 1, 2024, announcement stating that after January 1, 2023, for an application to be considered submitted, it must be submitted in STEERS. Please see the announcement at the following link: [Announcements for Title V Operating Permits - Texas Commission on Environmental Quality - www.tceq.texas.gov](#)

To issue this renewal project before the effective permit expires to avoid any non-compliance situations, please ensure that all requested information is provided by the requested due date/s. Also, the public notice and sign postings need to be published/posted as indicated below.

Accordingly, we are doing everything we can to help make sure the renewal is issued by the March 10, 2026 expiration date. To meet this date, the related English public notice and sign postings must be published/posted as soon as possible after the issuance of the Public Notice Authorization Package (PNAP), but no later than December 17, 2025. We plan to issue the PNAP as soon as possible but no later than December 3, 2025.

Please provide Form OP-PBRSUP at your earliest opportunity, but please no later than **11/24/2025**.

Also, the attachment you provided as the updated Form OP-1 still contained a “blank” Section X. Please include an updated Form OP-1 Section X with the Form OP-PBRSUP.

Yes, Form OP-PBRSUP, as well as all changes/updates made since the original renewal application, will need to be certified. I will request the final Form OP-CRO1 once the project has completed our internal QAQC process. I plan on sending the project to QAQC the day after receiving Forms OP-PBRSUP and OP-. Please be prepared to provide the final Form OP-CRO1 a day or two following the request.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087**

[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
[\(512\) 239-3373](tel:(512)239-3373)



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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Sent:** Friday, November 14, 2025 4:50 PM

**To:** Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>

**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,

Sorry for the delay in responding, I have been out of the office for the past 2 weeks returning yesterday and did not yet see your email until now. The application was submitted on August 5, 2025 within the required time frame. I previously provided the proof of submittal to the apirt email address at the request of Sean Wheeler of TCEQ.

I have no issues with the WPD.

For Item 1 below, yes, the 3/23/2023 is the correct issuance date.

For Item 2, regarding the OP-PBRSUP, I will be traveling for business on Monday but will get that completed to you ASAP. Can you verify that a new OP-CRO1 will be required with the OP-PBRSUP.

For Item 3 regarding OP-1, I am not sure why it was blank unless it was due to the merger of pdf files. Attached is the completed Form.

If you need anything additional, please let me know,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>

**Sent:** Wednesday, November 5, 2025 2:40 PM

**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>

**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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

Good afternoon,

I have been assigned the submitted renewal application for Silgan Containers Manufacturing Corporation, associated with Site Operating Permit (SOP) O1781 for their Paris Plant. The application has been assigned Project No. 39229. The application is untimely as it was submitted on October 10, 2025, less than 6 months from the March 10, 2026, permit expiration.

I have completed the technical review and attached is the Working Draft Permit (WDP) for your review and approval, and/or comments. During the technical review process, the following items surfaced which must be addressed:

- 1) The indicated issuance date for NSR 21720 on the submitted Form OP-REQ1 is 8/1/2013. The NSR database indicates a renewal was issued 3/23/2023 (Project 352677). The 3/23/2023 issuance date appears to be the correct date to reference in the SOP as part of this renewal project. Please confirm if 3/23/2023 should be used as the issuance date for NSR 21720. Please note the related permit face, conditions, and MAERT associated with the 3/23/2023 issuance of the NSR 21720 renewal were provided as part of the SOP renewal application package.
- 2) The NSR database indicates the site has several active claimed Permit by Rule (PBRs) and claimed Standard Exemptions (SEs) being utilized at the site. As of August 1, 2020, Form OP-PBRSUP is required for all SOP renewal applications. It does not appear this form was submitted as part of the renewal application. Please submit a completed Form OP-PBRSUP (form is attached for convenience). Please note that all four Tables must be submitted and any PBR and/or SE that is listed on either Table A and/or Table B, must be also listed on Table D.
- 3) The submitted Form OP-1 Section X. contained no responses. Please submit an updated Form OP-1 (form is attached for convenience) with proper responses, as applicable, to Section X. questions A. – L.

Please provide your approval and/or comments to the WDP, and the requested updated forms as soon as possible but no later than **close of business on Monday, November 10, 2025.** Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

If you are unable to submit the requested updates via STEERS, please be advised that an OP-CRO1 must also be provided to certify all these changes. If you are unable to provide updates in STEERS, please provide the signed document via email attachment and then follow-up with providing the original, wet-ink Form OP-CRO1 document via overnight delivery.

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

- a. NSR permit and PBR monitoring sufficiency –please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient.



- b. Reference to confidential business information (CBI) in NSR permits and PBR submittals.
- c. High-level terms in the SOP Applicable Requirement Summary Table. The high-level terms are sometimes used in SOPs when unit attribute forms have not yet been updated due to regulatory amendments.
- d. Accuracy of PBR information provided on the supplemental table and in the permit – please refer to Forms OP-PBRSUP and OP-REQ1 Instructions.

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

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. 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 were 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](#).

Finally, per the note provided on the cover letter for this renewal application "...the Paris plant is scheduled to be closed and permanently shutdown as of June 30, 2026", please be advised that once this renewal is issued and the site is shutdown, a Void application will need to be submitted via STEERS for SOP No. O1781.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087**

[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)

[\(512\) 239-3373](tel:(512)239-3373)



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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
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
ES-2400	106.473	9/4/2000	Uncontrolled Emissions less than 25 tpy
			Loading rate not to exceed 20,000 gal/day over consecutive 30-day period
			Capacity of tank not to exceed 25,000 gallons
			Maintain records of materials stored
			Recordkeeping as required by 30 TAC 106.4
			Recordkeeping as required by 30 TAC 106.8

**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
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
ES-2500	106.473	9/4/2000	Uncontrolled Emissions less than 25 tpy
			Loading rate not to exceed 20,000 gal/day over consecutive 30-day period
			Capacity of tank not to exceed 25,000 gallons
			Maintain records of materials stored
			Recordkeeping as required by 30 TAC 106.4
			Recordkeeping as required by 30 TAC 106.8

**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
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
ES-3140	106.474	9/4/2000	Maintain records of materials stored.
			Maintain records of SDS showing acid strength
ES-005	106.454	11/1/2001	Maintain records of total solvent makeup
			Maintain records of solvent disposal
			Maintain records of solvent materials used
			Maintain records of all degreaser maintenance activities
			Maintain records of SDS showing vapor pressure

**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
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
ES-004	106.261	11/1/2003	Maintain records of emissions in pounds per hour and tons per year for all
			listed materials.
			Maintain records of all new or increased emissions of any chemical having a
			limit value greater than 200 mg/m3.
			Maintain records of visible emissions.
			Recordkeeping as required by 30 TAC 106.4
			Recordkeeping as required by 30 TAC 106.8

**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
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
ES-003	106.263	11/1/2001	Maintain records containing sufficient information to demonstrate compliance
			and must be separate and distinct records from records maintained for any
			other air authorization.
			Records for all maintenance, start-up or shutdown activities and temporary
			facilities must identify: 1) type and reason for the activity; 2) processes and
			equipment involved; 3) time, date and duration of the activity; 4) the air
			contaminants and amounts which are emitted as a result of the activity.
ES-001	106.227	106.227	Maintain records of emissions of lead, when applicable
ES-002	106.265	9/4/2000	Recordkeeping as required by 30 TAC 106.4
			Recordkeeping as required by 30 TAC 106.8

**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
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
ES-2130	51	9/13/1993	Maintain records of materials loaded or unloaded
			Recordkeeping as required by 30 TAC 106.4
			Recordkeeping as required by 30 TAC 106.8



**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
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date
ES-2400	106.473	9/4/2000
ES-2500	106.473	9/4/2000
ES-3140	106.474	9/4/2000
ES-005	106.454	11/1/2001
ES-004	106.261	11/1/2003
ES-003	106.263	11/1/2001
ES-001	106.227	9/4/2000
ES-002	106.265	9/4/2000
ES-2130	51	9/13/1993

**From:** John Walker  
**Sent:** Monday, December 8, 2025 11:18 AM  
**To:** Mike Huff; Ifeoluwa Babarinde  
**Cc:** Mark Meyer  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good Morning,

If that is the case, you may remove them from Form OP-PBRSUP. In your email response with the updated Form OP-PBRSUP, please also state that the PBRs and SE should be removed from the Title V permit.

Please remember that any PBRs that are documented as a Preconstruction Authorization (PCA) for any unit listed in the permit should be documented on Form OP-PBRSUP. If the PCA needs to be updated in the permit for any unit, please provide that updated information.

Please let me know if you have any additional questions.

Sincerely,

**John Walker**

Permit Reviewer  
OA/Air Permits Division/OP Section  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
John.Walker@tceq.texas.gov

Phone: (512) 239-1277



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**From:** Mike Huff <mhuff@silgancontainers.com>  
**Sent:** Monday, December 8, 2025 11:12 AM  
**To:** John Walker <John.Walker@tceq.texas.gov>; Ifeoluwa Babarinde <Ifeoluwa.Babarinde@tceq.texas.gov>  
**Cc:** Mark Meyer <Mark.Meyer@tceq.texas.gov>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

In looking at these more closely, there are a number of the PBRs and one SE that are no longer applicable. Should I now just delete or not include those in the list?

Thanks,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Sent:** Monday, December 8, 2025 8:16 AM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>; Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good Morning Micheal,

I spoke about this issue with our manager Rhyen Stone last Friday and he stated that you will need to provide an updated Form OP-PBRSUP. He stated we have not allowed "site wide" as the Unit ID on Form OP-PBRSUP in the past and you will need to identify the specific units.

Please provide the updated Form OP-PBRSUP by close of business today, 12/08/2025.

Please let us know if you have any other questions.

Sincerely,

**John Walker**

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

Phone: (512) 239-1277



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**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Sent:** Sunday, December 7, 2025 7:14 PM  
**To:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

John,  
Mark Meyer told me to use "Site-Wide" for any unit ID was not specifically listed in the permit. If you still need me to change the forms, please let me know,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Sent:** Friday, December 5, 2025 3:06 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>; Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good Afternoon Micheal,

I have a few comments on the Form OP-PBRSUP Tables B and D provided.

1. "Site Wide" was listed for many of the Unit IDs. We have not allowed "Site Wide" as a Unit ID in the past. If there are no Unit IDs from the Title V permit to use, you may create your own Unit ID that represents how the site documents the unit.
2. For Standard Exemption (SE) 51, you have entered "Site Wide" as the Unit ID but Unit ID ES-2130 is documented as being authorized by SE 51 in the Title V draft permit. Please add the Unit ID "ES-2130" in place of "Site-wide" or confirm any other the necessary changes.
3. Please update the date in the top left of the form pages to reflect the submittal date (12/05/2025).

Please provide the requested information by close of business today, **12/05/2025.**

Please let me know if you have any questions.

Sincerely,

**John Walker**

Team Leader

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)

Phone: (512) 239-1277



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**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Sent:** Friday, December 5, 2025 2:40 PM

**To:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>

**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,

Please find attached the update Forms B and D.

## D. Michael Huff

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>

**Sent:** Tuesday, December 2, 2025 4:47 PM

**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>

**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good afternoon,

During the final review for issuance of the renewal application for Silgan Containers Manufacturing Corporation, associated with Site Operating Permit (SOP) O1781 for their Paris Plant, the following items surfaced which require additional information and/or documentation. Please provide your responses and the requested information and/or documentation as appropriate, at your earliest opportunity, but please no later than **12/03/2025**:

1. The submitted Form OP-PBRSUP, contains several discrepancies. Please submit an updated Form OP-PBRSUP to addresses the following issues:
  - More than one Permit by Rule (PBR) was listed in the first row. Each individual PBR should be listed on a separate row with the corresponding version dates listed in the column directly in front of the associated PBR.
  - The version dates listed for all the PBRs do not appear to be accurate compared to the TCEQ database. Version dates typically reflect the most recent effective date of the specific section of 30 TAC Chapter 106 under which the PBR was authorized. The effective version date format is usually (MM/DD/YYYY).
  - PBR 106.263 appears three separate times on different rows with some combinations of letters and numbers added to it. Please correct these errors so that PBR 106.263 is listed only once and ensure that any additional

or incorrect characters are removed. The correct format for listing PBRs is generally 106.XXX with no letters or extra numbers appended.

- Any units listed in the New Source Review Authorization References by Emissions Unit Table on page 12 of the Draft SOP that have PBRs as Preconstruction Authorizations should be documented on Table A (for registered PBRs) or Table B (for claimed PBRs) and Table D. The recently submitted form includes only Table C.

2. The currently authorized Responsible Official (RO) for the facility is Kerry Wild. However, the application appears to have been certified by James Berry as the RO. Please note that only the individual officially authorized as the RO or DAR is permitted to certify any application and related submittals. If you need a change of the Responsible Official, please submit an OP-CRO2. Please provide an electronic copy of the form followed by a hardcopy with a wet-ink signature.

As a reminder, application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO or DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. However, application updates that are provided through email or physical mail will require certification using an original signature OP-CRO1. I will request the final OP-CRO1 submittal at the proper time.

Please be sure to notify me whenever any updates are submitted via STEERS.

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

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division**

**Texas Commission on Environmental Quality**  
**MC-163, P.O. Box 13087**  
**Austin, TX 78711-3087**

[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)

[\(512\) 239-3373](tel:(512)239-3373)



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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Sent:** Wednesday, November 26, 2025 10:50 AM

**To:** Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>

**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,

Attached please find the OP-PBRSUP along with a signed OP-CRO1.

I completely misread your email requesting this information by 11/24/2025. I was traveling last week for some reason thought it was 12/01/2025.

If you need anything additional please let me know,

**D. Michael Huff**

Air Compliance Manager

Silgan Containers Manufacturing Corporation

P.O. Box 40

Paris, TX 75461

(w) 903-782-1263

(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>

**Sent:** Monday, November 17, 2025 3:14 PM

**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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



Mr. Huff,

Thank you for your response.

Management has advised me that TCEQ has determined this renewal application as untimely as it was not submitted via STEERS 6-18 months prior to the expiration date of FOP O1781. The official received date is 10/10/2025. Please refer to the March 1, 2024, announcement stating that after January 1, 2023, for an application to be considered submitted, it must be submitted in STEERS. Please see the announcement at the following link: [Announcements for Title V Operating Permits - Texas Commission on Environmental Quality - www.tceq.texas.gov](https://www.tceq.texas.gov/announcements/title-v-operating-permits)

To issue this renewal project before the effective permit expires to avoid any non-compliance situations, please ensure that all requested information is provided by the requested due date/s. Also, the public notice and sign postings need to be published/posted as indicated below.

Accordingly, we are doing everything we can to help make sure the renewal is issued by the March 10, 2026 expiration date. To meet this date, the related English public notice and sign postings must be published/posted as soon as possible after the issuance of the Public Notice Authorization Package (PNAP), but no later than December 17, 2025. We plan to issue the PNAP as soon as possible but no later than December 3, 2025.

Please provide Form OP-PBRSUP at your earliest opportunity, but please no later than **11/24/2025**.

Also, the attachment you provided as the updated Form OP-1 still contained a “blank” Section X. Please include an updated Form OP-1 Section X with the Form OP-PBRSUP.

Yes, Form OP-PBRSUP, as well as all changes/updates made since the original renewal application, will need to be certified. I will request the final Form OP-CRO1 once the project has completed our internal QAQC process. I plan on sending the project to QAQC the day after receiving Forms OP-PBRSUP and OP-. Please be prepared to provide the final Form OP-CRO1 a day or two following the request.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
(512) 239-3373**



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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Sent:** Friday, November 14, 2025 4:50 PM  
**To:** Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,  
Sorry for the delay in responding, I have been out of the office for the past 2 weeks returning yesterday and did not yet see your email until now. The application was submitted on August 5, 2025 within the required time frame. I previously provided the proof of submittal to the apirt email address at the request of Sean Wheeler of TCEQ.

I have no issues with the WPD.

For Item 1 below, yes, the 3/23/2023 is the correct issuance date.

For Item 2, regarding the OP-PBRSUP, I will be traveling for business on Monday but will get that completed to you ASAP. Can you verify that a new OP-CRO1 will be required with the OP-PBRSUP.

For Item 3 regarding OP-1, I am not sure why it was blank unless it was due to the merger of pdf files. Attached is the completed Form.

If you need anything additional, please let me know,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Sent:** Wednesday, November 5, 2025 2:40 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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

Good afternoon,

I have been assigned the submitted renewal application for Silgan Containers Manufacturing Corporation, associated with Site Operating Permit (SOP) O1781 for their Paris Plant. The application has been assigned Project No. 39229. The application is untimely as it was submitted on October 10, 2025, less than 6 months from the March 10, 2026, permit expiration.

I have completed the technical review and attached is the Working Draft Permit (WDP) for your review and approval, and/or comments. During the technical review process, the following items surfaced which must be addressed:

- 1) The indicated issuance date for NSR 21720 on the submitted Form OP-REQ1 is 8/1/2013. The NSR database indicates a renewal was issued 3/23/2023 (Project 352677). The 3/23/2023 issuance date appears to be the correct date to reference in the SOP as part of this renewal project. Please confirm if 3/23/2023 should be used as the issuance date for NSR 21720. Please note the related permit face, conditions, and MAERT associated with the 3/23/2023 issuance of the NSR 21720 renewal were provided as part of the SOP renewal application package.
- 2) The NSR database indicates the site has several active claimed Permit by Rule (PBRs) and claimed Standard Exemptions (SEs) being utilized at the site. As of August 1, 2020, Form OP-PBRSUP is required for all SOP renewal applications. It does not appear this form was submitted as part of the renewal application. Please submit a completed Form OP-PBRSUP (form is attached for convenience). Please note that all four Tables must be submitted and any PBR and/or SE that is listed on either Table A and/or Table B, must be also listed on Table D.

- 3) The submitted Form OP-1 Section X. contained no responses. Please submit an updated Form OP-1 (form is attached for convenience) with proper responses, as applicable, to Section X. questions A. – L.

Please provide your approval and/or comments to the WDP, and the requested updated forms as soon as possible but no later than **close of business on Monday, November 10, 2025.** Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

If you are unable to submit the requested updates via STEERS, please be advised that an OP-CRO1 must also be provided to certify all these changes. If you are unable to provide updates in STEERS, please provide the signed document via email attachment and then follow-up with providing the original, wet-ink Form OP-CRO1 document via overnight delivery.

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

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

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

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. 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 were 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](#).

Finally, per the note provided on the cover letter for this renewal application "...the Paris plant is scheduled to be closed and permanently shutdown as of June 30, 2026", please be advised that once this renewal is issued and the site is shutdown, a Void application will need to be submitted via STEERS for SOP No. O1781.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087**

[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)

[\(512\) 239-3373](tel:(512)239-3373)



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**From:** Mike Huff <mhuff@silgancontainers.com>  
**Sent:** Monday, December 8, 2025 11:12 AM  
**To:** John Walker; Ifeoluwa Babarinde  
**Cc:** Mark Meyer  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

In looking at these more closely, there are a number of the PBRs and one SE that are no longer applicable. Should I now just delete or not include those in the list?

Thanks,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** John Walker <John.Walker@tceq.texas.gov>  
**Sent:** Monday, December 8, 2025 8:16 AM  
**To:** Mike Huff <mhuff@silgancontainers.com>; Ifeoluwa Babarinde <Ifeoluwa.Babarinde@tceq.texas.gov>  
**Cc:** Mark Meyer <Mark.Meyer@tceq.texas.gov>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good Morning Micheal,

I spoke about this issue with our manager Rhyen Stone last Friday and he stated that you will need to provide an updated Form OP-PBRSUP. He stated we have not allowed "site wide" as the Unit ID on Form OP-PBRSUP in the past and you will need to identify the specific units.

Please provide the updated Form OP-PBRSUP by close of business today, 12/08/2025.

Please let us know if you have any other questions.

Sincerely,

**John Walker**

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

Phone: (512) 239-1277



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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Sent:** Sunday, December 7, 2025 7:14 PM  
**To:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

John,  
Mark Meyer told me to use "Site-Wide" for any unit ID was not specifically listed in the permit. If you still need me to change the forms, please let me know,

**D. Michael Huff**  
Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Sent:** Friday, December 5, 2025 3:06 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>; Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP 01781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good Afternoon Micheal,

I have a few comments on the Form OP-PBRUP Tables B and D provided.

1. "Site Wide" was listed for many of the Unit IDs. We have not allowed "Site Wide" as a Unit ID in the past. If there are no Unit IDs from the Title V permit to use, you may create your own Unit ID that represents how the site documents the unit.
2. For Standard Exemption (SE) 51, you have entered "Site Wide" as the Unit ID but Unit ID ES-2130 is documented as being authorized by SE 51 in the Title V draft permit. Please add the Unit ID "ES-2130" in place of "Site-wide" or confirm any other the necessary changes.
3. Please update the date in the top left of the form pages to reflect the submittal date (12/05/2025).

Please provide the requested information by close of business today, **12/05/2025**.

Please let me know if you have any questions.

Sincerely,

**John Walker**

Team Leader

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)

Phone: (512) 239-1277



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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Sent:** Friday, December 5, 2025 2:40 PM

**To:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>



**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,  
Please find attached the update Forms B and D.

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>

**Sent:** Tuesday, December 2, 2025 4:47 PM

**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>

**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good afternoon,

During the final review for issuance of the renewal application for Silgan Containers Manufacturing Corporation, associated with Site Operating Permit (SOP) O1781 for their Paris Plant, the following items surfaced which require additional information and/or documentation. Please provide your responses and the requested information and/or documentation as appropriate, at your earliest opportunity, but please no later than **12/03/2025:**

1. The submitted Form OP-PBRSUP, contains several discrepancies. Please submit an updated Form OP-PBRSUP to addresses the following issues:
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  - The version dates listed for all the PBRs do not appear to be accurate compared to the TCEQ database. Version dates typically reflect the most recent effective date of the

specific section of 30 TAC Chapter 106 under which the PBR was authorized. The effective version date format is usually (MM/DD/YYYY).

- PBR 106.263 appears three separate times on different rows with some combinations of letters and numbers added to it. Please correct these errors so that PBR 106.263 is listed only once and ensure that any additional or incorrect characters are removed. The correct format for listing PBRs is generally 106.XXX with no letters or extra numbers appended.
- Any units listed in the New Source Review Authorization References by Emissions Unit Table on page 12 of the Draft SOP that have PBRs as Preconstruction Authorizations should be documented on Table A (for registered PBRs) or Table B (for claimed PBRs) and Table D. The recently submitted form includes only Table C.

2. The currently authorized Responsible Official (RO) for the facility is Kerry Wild. However, the application appears to have been certified by James Berry as the RO. Please note that only the individual officially authorized as the RO or DAR is permitted to certify any application and related submittals. If you need a change of the Responsible Official, please submit an OP-CRO2. Please provide an electronic copy of the form followed by a hardcopy with a wet-ink signature.

As a reminder, application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO or DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. However, application updates that are provided through email or physical mail will require certification using an original signature OP-CRO1. I will request the final OP-CRO1 submittal at the proper time.

Please be sure to notify me whenever any updates are submitted via STEERS.

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

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
(512) 239-3373**



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**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Sent:** Wednesday, November 26, 2025 10:50 AM  
**To:** Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,  
Attached please find the OP-PBRSUP along with a signed OP-CRO1.

I completely misread your email requesting this information by 11/24/2025. I was traveling last week for some reason thought it was 12/01/2025.

If you need anything additional please let me know,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>  
**Sent:** Monday, November 17, 2025 3:14 PM

**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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

Mr. Huff,

Thank you for your response.

Management has advised me that TCEQ has determined this renewal application as untimely as it was not submitted via STEERS 6-18 months prior to the expiration date of FOP O1781. The official received date is 10/10/2025. Please refer to the March 1, 2024, announcement stating that after January 1, 2023, for an application to be considered submitted, it must be submitted in STEERS. Please see the announcement at the following link: [Announcements for Title V Operating Permits - Texas Commission on Environmental Quality - www.tceq.texas.gov](#)

To issue this renewal project before the effective permit expires to avoid any non-compliance situations, please ensure that all requested information is provided by the requested due date/s. Also, the public notice and sign postings need to be published/posted as indicated below.

Accordingly, we are doing everything we can to help make sure the renewal is issued by the March 10, 2026 expiration date. To meet this date, the related English public notice and sign postings must be published/posted as soon as possible after the issuance of the Public Notice Authorization Package (PNAP), but no later than December 17, 2025. We plan to issue the PNAP as soon as possible but no later than December 3, 2025.

Please provide Form OP-PBRSUP at your earliest opportunity, but please no later than **11/24/2025**.

Also, the attachment you provided as the updated Form OP-1 still contained a "blank" Section X. Please include an updated Form OP-1 Section X with the Form OP-PBRSUP.

Yes, Form OP-PBRSUP, as well as all changes/updates made since the original renewal application, will need to be certified. I will request the final Form OP-CRO1 once the project has completed our internal QAQC process. I plan on sending the project to QAQC the day after receiving Forms OP-PBRSUP and OP-. Please be prepared to provide the final Form OP-CRO1 a day or two following the request.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
(512) 239-3373**



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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Sent:** Friday, November 14, 2025 4:50 PM  
**To:** Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,  
Sorry for the delay in responding, I have been out of the office for the past 2 weeks returning yesterday and did not yet see your email until now. The application was submitted on August 5, 2025 within the required time frame. I previously provided the proof of submittal to the apirt email address at the request of Sean Wheeler of TCEQ.

I have no issues with the WPD.

For Item 1 below, yes, the 3/23/2023 is the correct issuance date.

For Item 2, regarding the OP-PBRSUP, I will be traveling for business on Monday but will get that completed to you ASAP. Can you verify that a new OP-CRO1 will be required with the OP-PBRSUP.

For Item 3 regarding OP-1, I am not sure why it was blank unless it was due to the merger of pdf files. Attached is the completed Form.

If you need anything additional, please let me know,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Sent:** Wednesday, November 5, 2025 2:40 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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

Good afternoon,

I have been assigned the submitted renewal application for Silgan Containers Manufacturing Corporation, associated with Site Operating Permit (SOP) O1781 for their Paris Plant. The application has been assigned Project No. 39229. The application is untimely as it was submitted on October 10, 2025, less than 6 months from the March 10, 2026, permit expiration.

I have completed the technical review and attached is the Working Draft Permit (WDP) for your review and approval, and/or comments. During the technical review process, the following items surfaced which must be addressed:

- 1) The indicated issuance date for NSR 21720 on the submitted Form OP-REQ1 is 8/1/2013. The NSR database indicates a renewal was issued 3/23/2023 (Project 352677). The 3/23/2023 issuance date appears to be the correct date to reference in the SOP as part of this renewal project. Please confirm if 3/23/2023 should be used as the issuance date for NSR 21720. Please note the related permit face, conditions, and MAERT associated with the 3/23/2023 issuance of the NSR 21720 renewal were provided as part of the SOP renewal application package.
- 2) The NSR database indicates the site has several active claimed Permit by Rule (PBRs) and claimed Standard Exemptions (SEs) being utilized at the site. As of August 1, 2020, Form OP-PBRSUP is required for all SOP renewal applications. It

does not appear this form was submitted as part of the renewal application. Please submit a completed Form OP-PBR SUP (form is attached for convenience). Please note that all four Tables must be submitted and any PBR and/or SE that is listed on either Table A and/or Table B, must be also listed on Table D.

- 3) The submitted Form OP-1 Section X. contained no responses. Please submit an updated Form OP-1 (form is attached for convenience) with proper responses, as applicable, to Section X. questions A. – L.

Please provide your approval and/or comments to the WDP, and the requested updated forms as soon as possible but no later than **close of business on Monday, November 10, 2025**. Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

If you are unable to submit the requested updates via STEERS, please be advised that an OP-CRO1 must also be provided to certify all these changes. If you are unable to provide updates in STEERS, please provide the signed document via email attachment and then follow-up with providing the original, wet-ink Form OP-CRO1 document via overnight delivery.

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

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

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

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. 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 were 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](#).

Finally, per the note provided on the cover letter for this renewal application "...the Paris plant is scheduled to be closed and permanently shutdown as of June 30, 2026", please be advised that once this renewal is issued and the site is shutdown, a Void application will need to be submitted via STEERS for SOP No. O1781.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
(512) 239-3373**



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**From:** John Walker  
**Sent:** Monday, December 8, 2025 8:26 AM  
**To:** Ifeoluwa Babarinde  
**Cc:** Mark Meyer  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good Morning,

I spoke with Rhyan about this on Friday and he stated the applicant needed to fix the Form OP-PBRSUP (provide unit IDs, not “site wide”). They need to identify the specific units that are authorized. I responded to Mike and asked for an updated Form OP-PBRSUP with a due date of today.

Please ensure no other information is required for the project for PNAP issuance. Once we receive Form OP-PBRSUP, you will need to request Form OP-CRO1 to be submitted by email and followed up with a mailed in hard copy with a wet-ink signature. Provided the applicant provides the Form OP-PBRSUP today, the date range on the Form OP-CRO1 being certified should be 10/10/2025 – 12/08/2025. The due date should be within 24 hours.

We need to try to get the PNAP issued on 12/10.

Please let me know if you have any questions.

Sincerely,

John Walker (x1277)  
Team Leader – Title

---

**From:** Mike Huff <mhuff@silgancontainers.com>  
**Sent:** Sunday, December 7, 2025 7:14 PM  
**To:** John Walker <John.Walker@tceq.texas.gov>; Ifeoluwa Babarinde <Ifeoluwa.Babarinde@tceq.texas.gov>  
**Cc:** Mark Meyer <Mark.Meyer@tceq.texas.gov>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

John,  
Mark Meyer told me to use “Site-Wide” for any unit ID was not specifically listed in the permit. If you still need me to change the forms, please let me know,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Sent:** Friday, December 5, 2025 3:06 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>; Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP 01781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good Afternoon Micheal,

I have a few comments on the Form OP-PBRUP Tables B and D provided.

1. "Site Wide" was listed for many of the Unit IDs. We have not allowed "Site Wide" as a Unit ID in the past. If there are no Unit IDs from the Title V permit to use, you may create your own Unit ID that represents how the site documents the unit.
2. For Standard Exemption (SE) 51, you have entered "Site Wide" as the Unit ID but Unit ID ES-2130 is documented as being authorized by SE 51 in the Title V draft permit. Please add the Unit ID "ES-2130" in place of "Site-wide" or confirm any other the necessary changes.
3. Please update the date in the top left of the form pages to reflect the submittal date (12/05/2025).

Please provide the requested information by close of business today, **12/05/2025.**

Please let me know if you have any questions.

Sincerely,

**John Walker**  
Team Leader  
OA/Air Permits Division/OP Section  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)

Phone: (512) 239-1277



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**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Sent:** Friday, December 5, 2025 2:40 PM  
**To:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,  
Please find attached the update Forms B and D.

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Sent:** Tuesday, December 2, 2025 4:47 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good afternoon,

During the final review for issuance of the renewal application for Silgan Containers Manufacturing Corporation, associated with Site Operating Permit (SOP) O1781 for their Paris Plant, the following items surfaced which require additional information and/or documentation. Please provide your responses and the requested information and/or

documentation as appropriate, at your earliest opportunity, but please no later than **12/03/2025:**

1. The submitted Form OP-PBR SUP, contains several discrepancies. Please submit an updated Form OP-PBR SUP to address the following issues:
  - More than one Permit by Rule (PBR) was listed in the first row. Each individual PBR should be listed on a separate row with the corresponding version dates listed in the column directly in front of the associated PBR.
  - The version dates listed for all the PBRs do not appear to be accurate compared to the TCEQ database. Version dates typically reflect the most recent effective date of the specific section of 30 TAC Chapter 106 under which the PBR was authorized. The effective version date format is usually (MM/DD/YYYY).
  - PBR 106.263 appears three separate times on different rows with some combinations of letters and numbers added to it. Please correct these errors so that PBR 106.263 is listed only once and ensure that any additional or incorrect characters are removed. The correct format for listing PBRs is generally 106.XXX with no letters or extra numbers appended.
  - Any units listed in the New Source Review Authorization References by Emissions Unit Table on page 12 of the Draft SOP that have PBRs as Preconstruction Authorizations should be documented on Table A (for registered PBRs) or Table B (for claimed PBRs) and Table D. The recently submitted form includes only Table C.
2. The currently authorized Responsible Official (RO) for the facility is Kerry Wild. However, the application appears to have been certified by James Berry as the RO. Please note that only the individual officially authorized as the RO or DAR is permitted to certify any application and related submittals. If you need a change of the Responsible Official, please submit an OP-CRO2. Please provide an electronic copy of the form followed by a hardcopy with a wet-ink signature.

As a reminder, application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO or DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. However, application updates that are provided through email or physical mail will require certification using an original signature OP-CRO1. I will request the final OP-CRO1 submittal at the proper time.

Please be sure to notify me whenever any updates are submitted via STEERS.

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

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
(512) 239-3373**



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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Sent:** Wednesday, November 26, 2025 10:50 AM

**To:** Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>

**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,

Attached please find the OP-PBRSUP along with a signed OP-CRO1.

I completely misread your email requesting this information by 11/24/2025. I was traveling last week for some reason thought it was 12/01/2025.

If you need anything additional please let me know,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

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**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Sent:** Monday, November 17, 2025 3:14 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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

Mr. Huff,

Thank you for your response.

Management has advised me that TCEQ has determined this renewal application as untimely as it was not submitted via STEERS 6-18 months prior to the expiration date of FOP O1781. The official received date is 10/10/2025. Please refer to the March 1, 2024, announcement stating that after January 1, 2023, for an application to be considered submitted, it must be submitted in STEERS. Please see the announcement at the following link: [Announcements for Title V Operating Permits - Texas Commission on Environmental Quality - \*www.tceq.texas.gov\*](#)

To issue this renewal project before the effective permit expires to avoid any non-compliance situations, please ensure that all requested information is provided by the requested due date/s. Also, the public notice and sign postings need to be published/posted as indicated below.

Accordingly, we are doing everything we can to help make sure the renewal is issued by the March 10, 2026 expiration date. To meet this date, the related English public notice and sign postings must be published/posted as soon as possible after the issuance of the Public Notice Authorization Package (PNAP), but no later than December 17, 2025. We plan to issue the PNAP as soon as possible but no later than December 3, 2025.

Please provide Form OP-PBRSUP at your earliest opportunity, but please no later than **11/24/2025**.

Also, the attachment you provided as the updated Form OP-1 still contained a “blank” Section X. Please include an updated Form OP-1 Section X with the Form OP-PBRSUP.

Yes, Form OP-PBRSUP, as well as all changes/updates made since the original renewal application, will need to be certified. I will request the final Form OP-CRO1 once the project has completed our internal QAQC process. I plan on sending the project to QAQC the day after receiving Forms OP-PBRSUP and OP-. Please be prepared to provide the final Form OP-CRO1 a day or two following the request.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
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(512) 239-3373



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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Sent:** Friday, November 14, 2025 4:50 PM

**To:** Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>

**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,

Sorry for the delay in responding, I have been out of the office for the past 2 weeks returning yesterday and did not yet see your email until now. The application was

submitted on August 5, 2025 within the required time frame. I previously provided the proof of submittal to the apirt email address at the request of Sean Wheeler of TCEQ.

I have no issues with the WPD.

For Item 1 below, yes, the 3/23/2023 is the correct issuance date.

For Item 2, regarding the OP-PBRSUP, I will be traveling for business on Monday but will get that completed to you ASAP. Can you verify that a new OP-CRO1 will be required with the OP-PBRSUP.

For Item 3 regarding OP-1, I am not sure why it was blank unless it was due to the merger of pdf files. Attached is the completed Form.

If you need anything additional, please let me know,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
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---

**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Sent:** Wednesday, November 5, 2025 2:40 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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Good afternoon,

I have been assigned the submitted renewal application for Silgan Containers Manufacturing Corporation, associated with Site Operating Permit (SOP) O1781 for their Paris Plant. The application has been assigned Project No. 39229. The application is untimely as it was submitted on October 10, 2025, less than 6 months from the March 10, 2026, permit expiration.



I have completed the technical review and attached is the Working Draft Permit (WDP) for your review and approval, and/or comments. During the technical review process, the following items surfaced which must be addressed:

- 1) The indicated issuance date for NSR 21720 on the submitted Form OP-REQ1 is 8/1/2013. The NSR database indicates a renewal was issued 3/23/2023 (Project 352677). The 3/23/2023 issuance date appears to be the correct date to reference in the SOP as part of this renewal project. Please confirm if 3/23/2023 should be used as the issuance date for NSR 21720. Please note the related permit face, conditions, and MAERT associated with the 3/23/2023 issuance of the NSR 21720 renewal were provided as part of the SOP renewal application package.
- 2) The NSR database indicates the site has several active claimed Permit by Rule (PBRs) and claimed Standard Exemptions (SEs) being utilized at the site. As of August 1, 2020, Form OP-PBRSUP is required for all SOP renewal applications. It does not appear this form was submitted as part of the renewal application. Please submit a completed Form OP-PBRSUP (form is attached for convenience). Please note that all four Tables must be submitted and any PBR and/or SE that is listed on either Table A and/or Table B, must be also listed on Table D.
- 3) The submitted Form OP-1 Section X. contained no responses. Please submit an updated Form OP-1 (form is attached for convenience) with proper responses, as applicable, to Section X. questions A. – L.

Please provide your approval and/or comments to the WDP, and the requested updated forms as soon as possible but no later than **close of business on Monday, November 10, 2025.** Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

If you are unable to submit the requested updates via STEERS, please be advised that an OP-CRO1 must also be provided to certify all these changes. If you are unable to provide updates in STEERS, please provide the signed document via email attachment and then follow-up with providing the original, wet-ink Form OP-CRO1 document via overnight delivery.

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

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

- d. Accuracy of PBR information provided on the supplemental table and in the permit – please refer to Forms OP-PBRSUP and OP-REQ1 Instructions.

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

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. 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 were 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](#).

Finally, per the note provided on the cover letter for this renewal application "...the Paris plant is scheduled to be closed and permanently shutdown as of June 30, 2026", please be advised that once this renewal is issued and the site is shutdown, a Void application will need to be submitted via STEERS for SOP No. O1781.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087**

[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)

(512) 239-3373



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

**From:** John Walker  
**Sent:** Monday, December 8, 2025 8:16 AM  
**To:** Mike Huff; Ifeoluwa Babarinde  
**Cc:** Mark Meyer  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good Morning Micheal,

I spoke about this issue with our manager Rhyan Stone last Friday and he stated that you will need to provide an updated Form OP-PBRSUP. He stated we have not allowed "site wide" as the Unit ID on Form OP-PBRSUP in the past and you will need to identify the specific units.

Please provide the updated Form OP-PBRSUP by close of business today, 12/08/2025.

Please let us know if you have any other questions.

Sincerely,

**John Walker**

Team Leader

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

John.Walker@tceq.texas.gov

Phone: (512) 239-1277



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**From:** Mike Huff <mhuff@silgancontainers.com>  
**Sent:** Sunday, December 7, 2025 7:14 PM  
**To:** John Walker <John.Walker@tceq.texas.gov>; Ifeoluwa Babarinde <Ifeoluwa.Babarinde@tceq.texas.gov>  
**Cc:** Mark Meyer <Mark.Meyer@tceq.texas.gov>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

John,  
Mark Meyer told me to use “Site-Wide” for any unit ID was not specifically listed in the permit. If you still need me to change the forms, please let me know,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

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**From:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Sent:** Friday, December 5, 2025 3:06 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>; Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good Afternoon Micheal,

I have a few comments on the Form OP-PBRSUP Tables B and D provided.

1. “Site Wide” was listed for many of the Unit IDs. We have not allowed “Site Wide” as a Unit ID in the past. If there are no Unit IDs from the Title V permit to use, you may create your own Unit ID that represents how the site documents the unit.
2. For Standard Exemption (SE) 51, you have entered “Site Wide” as the Unit ID but Unit ID ES-2130 is documented as being authorized by SE 51 in the Title V draft permit. Please add the Unit ID “ES-2130” in place of “Site-wide” or confirm any other the necessary changes.
3. Please update the date in the top left of the form pages to reflect the submittal date (12/05/2025).

Please provide the requested information by close of business today, **12/05/2025.**

Please let me know if you have any questions.

Sincerely,

**John Walker**

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

Phone: (512) 239-1277



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**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Sent:** Friday, December 5, 2025 2:40 PM  
**To:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,  
Please find attached the update Forms B and D.

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

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**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Sent:** Tuesday, December 2, 2025 4:47 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good afternoon,

During the final review for issuance of the renewal application for Silgan Containers Manufacturing Corporation, associated with Site Operating Permit (SOP) O1781 for their Paris Plant, the following items surfaced which require additional information and/or documentation. Please provide your responses and the requested information and/or documentation as appropriate, at your earliest opportunity, but please no later than **12/03/2025**:

1. The submitted Form OP-PBRSUP, contains several discrepancies. Please submit an updated Form OP-PBRSUP to addresses the following issues:
  - More than one Permit by Rule (PBR) was listed in the first row. Each individual PBR should be listed on a separate row with the corresponding version dates listed in the column directly in front of the associated PBR.
  - The version dates listed for all the PBRs do not appear to be accurate compared to the TCEQ database. Version dates typically reflect the most recent effective date of the specific section of 30 TAC Chapter 106 under which the PBR was authorized. The effective version date format is usually (MM/DD/YYYY).
  - PBR 106.263 appears three separate times on different rows with some combinations of letters and numbers added to it. Please correct these errors so that PBR 106.263 is listed only once and ensure that any additional or incorrect characters are removed. The correct format for listing PBRs is generally 106.XXX with no letters or extra numbers appended.
  - Any units listed in the New Source Review Authorization References by Emissions Unit Table on page 12 of the Draft SOP that have PBRs as Preconstruction Authorizations should be documented on Table A (for registered PBRs) or Table B (for claimed PBRs) and Table D. The recently submitted form includes only Table C.
2. The currently authorized Responsible Official (RO) for the facility is Kerry Wild. However, the application appears to have been certified by James Berry as the RO. Please note that only the individual officially authorized as the RO or DAR is permitted to certify any application and related submittals. If you need a change of the Responsible Official, please submit an OP-CRO2. Please provide an electronic copy of the form followed by a hardcopy with a wet-ink signature.

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Please be sure to notify me whenever any updates are submitted via STEERS.

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

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
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MC-163, P.O. Box 13087  
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(512) 239-3373**



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**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Sent:** Wednesday, November 26, 2025 10:50 AM

**To:** Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>

**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant



Ifeoluwa,  
Attached please find the OP-PBRSUP along with a signed OP-CRO1.

I completely misread your email requesting this information by 11/24/2025. I was traveling last week for some reason thought it was 12/01/2025.

If you need anything additional please let me know,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>  
**Sent:** Monday, November 17, 2025 3:14 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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

Mr. Huff,

Thank you for your response.

Management has advised me that TCEQ has determined this renewal application as untimely as it was not submitted via STEERS 6-18 months prior to the expiration date of FOP O1781. The official received date is 10/10/2025. Please refer to the March 1, 2024, announcement stating that after January 1, 2023, for an application to be considered submitted, it must be submitted in STEERS. Please see the announcement at the following link: [Announcements for Title V Operating Permits - Texas Commission on Environmental Quality - www.tceq.texas.gov](#)

To issue this renewal project before the effective permit expires to avoid any non-compliance situations, please ensure that all requested information is provided by the requested due date/s. Also, the public notice and sign postings need to be published/posted as indicated below.

Accordingly, we are doing everything we can to help make sure the renewal is issued by the March 10, 2026 expiration date. To meet this date, the related English public notice and sign postings must be published/posted as soon as possible after the issuance of the Public Notice Authorization Package (PNAP), but no later than December 17, 2025. We plan to issue the PNAP as soon as possible but no later than December 3, 2025.

Please provide Form OP-PBR SUP at your earliest opportunity, but please no later than **11/24/2025**.

Also, the attachment you provided as the updated Form OP-1 still contained a “blank” Section X. Please include an updated Form OP-1 Section X with the Form OP-PBR SUP.

Yes, Form OP-PBR SUP, as well as all changes/updates made since the original renewal application, will need to be certified. I will request the final Form OP-CRO1 once the project has completed our internal QAQC process. I plan on sending the project to QAQC the day after receiving Forms OP-PBR SUP and OP-. Please be prepared to provide the final Form OP-CRO1 a day or two following the request.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Sent:** Friday, November 14, 2025 4:50 PM

**To:** Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>

**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,

Sorry for the delay in responding, I have been out of the office for the past 2 weeks returning yesterday and did not yet see your email until now. The application was submitted on August 5, 2025 within the required time frame. I previously provided the proof of submittal to the apirt email address at the request of Sean Wheeler of TCEQ.

I have no issues with the WPD.

For Item 1 below, yes, the 3/23/2023 is the correct issuance date.

For Item 2, regarding the OP-PBRSUP, I will be traveling for business on Monday but will get that completed to you ASAP. Can you verify that a new OP-CRO1 will be required with the OP-PBRSUP.

For Item 3 regarding OP-1, I am not sure why it was blank unless it was due to the merger of pdf files. Attached is the completed Form.

If you need anything additional, please let me know,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>

**Sent:** Wednesday, November 5, 2025 2:40 PM

**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>

**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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

Good afternoon,

I have been assigned the submitted renewal application for Silgan Containers Manufacturing Corporation, associated with Site Operating Permit (SOP) O1781 for their Paris Plant. The application has been assigned Project No. 39229. The application is untimely as it was submitted on October 10, 2025, less than 6 months from the March 10, 2026, permit expiration.

I have completed the technical review and attached is the Working Draft Permit (WDP) for your review and approval, and/or comments. During the technical review process, the following items surfaced which must be addressed:

- 1) The indicated issuance date for NSR 21720 on the submitted Form OP-REQ1 is 8/1/2013. The NSR database indicates a renewal was issued 3/23/2023 (Project 352677). The 3/23/2023 issuance date appears to be the correct date to reference in the SOP as part of this renewal project. Please confirm if 3/23/2023 should be used as the issuance date for NSR 21720. Please note the related permit face, conditions, and MAERT associated with the 3/23/2023 issuance of the NSR 21720 renewal were provided as part of the SOP renewal application package.
- 2) The NSR database indicates the site has several active claimed Permit by Rule (PBRs) and claimed Standard Exemptions (SEs) being utilized at the site. As of August 1, 2020, Form OP-PBRSUP is required for all SOP renewal applications. It does not appear this form was submitted as part of the renewal application. Please submit a completed Form OP-PBRSUP (form is attached for convenience). Please note that all four Tables must be submitted and any PBR and/or SE that is listed on either Table A and/or Table B, must be also listed on Table D.
- 3) The submitted Form OP-1 Section X. contained no responses. Please submit an updated Form OP-1 (form is attached for convenience) with proper responses, as applicable, to Section X. questions A. – L.

Please provide your approval and/or comments to the WDP, and the requested updated forms as soon as possible but no later than **close of business on Monday, November 10, 2025.** Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

If you are unable to submit the requested updates via STEERS, please be advised that an OP-CRO1 must also be provided to certify all these changes. If you are unable to provide updates in STEERS, please provide the signed document via email attachment and then follow-up with providing the original, wet-ink Form OP-CRO1 document via overnight delivery.

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

- a. NSR permit and PBR monitoring sufficiency –please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient.

- b. Reference to confidential business information (CBI) in NSR permits and PBR submittals.
- c. High-level terms in the SOP Applicable Requirement Summary Table. The high-level terms are sometimes used in SOPs when unit attribute forms have not yet been updated due to regulatory amendments.
- d. Accuracy of PBR information provided on the supplemental table and in the permit – please refer to Forms OP-PBRSUP and OP-REQ1 Instructions.

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

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. 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 were 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](#).

Finally, per the note provided on the cover letter for this renewal application "...the Paris plant is scheduled to be closed and permanently shutdown as of June 30, 2026", please be advised that once this renewal is issued and the site is shutdown, a Void application will need to be submitted via STEERS for SOP No. O1781.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087**

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[\(512\) 239-3373](tel:(512)239-3373)



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**Sent:** Sunday, December 7, 2025 7:14 PM  
**To:** John Walker; Ifeoluwa Babarinde  
**Cc:** Mark Meyer  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

John,  
Mark Meyer told me to use "Site-Wide" for any unit ID was not specifically listed in the permit. If you still need me to change the forms, please let me know,

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Air Compliance Manager  
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**Sent:** Friday, December 5, 2025 3:06 PM  
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Good Afternoon Micheal,

I have a few comments on the Form OP-PBRUP Tables B and D provided.

1. "Site Wide" was listed for many of the Unit IDs. We have not allowed "Site Wide" as a Unit ID in the past. If there are no Unit IDs from the Title V permit to use, you may create your own Unit ID that represents how the site documents the unit.
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3. Please update the date in the top left of the form pages to reflect the submittal date (12/05/2025).

Please provide the requested information by close of business today, **12/05/2025.**

Please let me know if you have any questions.

Sincerely,

**John Walker**

Team Leader

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)

Phone: (512) 239-1277



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**Sent:** Friday, December 5, 2025 2:40 PM

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**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,

Please find attached the update Forms B and D.

**D. Michael Huff**

Air Compliance Manager

Silgan Containers Manufacturing Corporation

P.O. Box 40

Paris, TX 75461

(w) 903-782-1263

(m) 903-249-0111



---

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**Sent:** Tuesday, December 2, 2025 4:47 PM  
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**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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  - More than one Permit by Rule (PBR) was listed in the first row. Each individual PBR should be listed on a separate row with the corresponding version dates listed in the column directly in front of the associated PBR.
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Please be sure to notify me whenever any updates are submitted via STEERS.

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

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087**

[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
[\(512\) 239-3373](tel:(512)239-3373)



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**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Sent:** Wednesday, November 26, 2025 10:50 AM  
**To:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,  
Attached please find the OP-PBR SUP along with a signed OP-CRO1.

I completely misread your email requesting this information by 11/24/2025. I was traveling last week for some reason thought it was 12/01/2025.

If you need anything additional please let me know,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Sent:** Monday, November 17, 2025 3:14 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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

Mr. Huff,

Thank you for your response.

Management has advised me that TCEQ has determined this renewal application as untimely as it was not submitted via STEERS 6-18 months prior to the expiration date of FOP O1781. The official received date is 10/10/2025. Please refer to the March 1, 2024, announcement stating that after January 1, 2023, for an application to be considered submitted, it must be submitted in STEERS. Please see the announcement at the following link: [Announcements for Title V Operating Permits - Texas Commission on Environmental Quality - www.tceq.texas.gov](#)

To issue this renewal project before the effective permit expires to avoid any non-compliance situations, please ensure that all requested information is provided by the requested due date/s. Also, the public notice and sign postings need to be published/posted as indicated below.

Accordingly, we are doing everything we can to help make sure the renewal is issued by the March 10, 2026 expiration date. To meet this date, the related English public notice and sign postings must be published/posted as soon as possible after the issuance of the Public Notice Authorization Package (PNAP), but no later than December 17, 2025. We plan to issue the PNAP as soon as possible but no later than December 3, 2025.

Please provide Form OP-PBR SUP at your earliest opportunity, but please no later than **11/24/2025**.

Also, the attachment you provided as the updated Form OP-1 still contained a “blank” Section X. Please include an updated Form OP-1 Section X with the Form OP-PBR SUP.

Yes, Form OP-PBR SUP, as well as all changes/updates made since the original renewal application, will need to be certified. I will request the final Form OP-CRO1 once the project has completed our internal QAQC process. I plan on sending the project to QAQC the day after receiving Forms OP-PBR SUP and OP-. Please be prepared to provide the final Form OP-CRO1 a day or two following the request.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
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**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Sent:** Friday, November 14, 2025 4:50 PM

**To:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>

**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,

Sorry for the delay in responding, I have been out of the office for the past 2 weeks returning yesterday and did not yet see your email until now. The application was submitted on August 5, 2025 within the required time frame. I previously provided the proof of submittal to the apirt email address at the request of Sean Wheeler of TCEQ.

I have no issues with the WPD.

For Item 1 below, yes, the 3/23/2023 is the correct issuance date.

For Item 2, regarding the OP-PBRSUP, I will be traveling for business on Monday but will get that completed to you ASAP. Can you verify that a new OP-CRO1 will be required with the OP-PBRSUP.

For Item 3 regarding OP-1, I am not sure why it was blank unless it was due to the merger of pdf files. Attached is the completed Form.

If you need anything additional, please let me know,

**D. Michael Huff**

Air Compliance Manager

Silgan Containers Manufacturing Corporation

P.O. Box 40

Paris, TX 75461

(w) 903-782-1263

(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Sent:** Wednesday, November 5, 2025 2:40 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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

Good afternoon,

I have been assigned the submitted renewal application for Silgan Containers Manufacturing Corporation, associated with Site Operating Permit (SOP) O1781 for their Paris Plant. The application has been assigned Project No. 39229. The application is untimely as it was submitted on October 10, 2025, less than 6 months from the March 10, 2026, permit expiration.

I have completed the technical review and attached is the Working Draft Permit (WDP) for your review and approval, and/or comments. During the technical review process, the following items surfaced which must be addressed:

- 1) The indicated issuance date for NSR 21720 on the submitted Form OP-REQ1 is 8/1/2013. The NSR database indicates a renewal was issued 3/23/2023 (Project 352677). The 3/23/2023 issuance date appears to be the correct date to reference in the SOP as part of this renewal project. Please confirm if 3/23/2023 should be used as the issuance date for NSR 21720. Please note the related permit face, conditions, and MAERT associated with the 3/23/2023 issuance of the NSR 21720 renewal were provided as part of the SOP renewal application package.
- 2) The NSR database indicates the site has several active claimed Permit by Rule (PBRs) and claimed Standard Exemptions (SEs) being utilized at the site. As of August 1, 2020, Form OP-PBRSUP is required for all SOP renewal applications. It does not appear this form was submitted as part of the renewal application. Please submit a completed Form OP-PBRSUP (form is attached for convenience). Please note that all four Tables must be submitted and any PBR and/or SE that is listed on either Table A and/or Table B, must be also listed on Table D.
- 3) The submitted Form OP-1 Section X. contained no responses. Please submit an updated Form OP-1 (form is attached for convenience) with proper responses, as applicable, to Section X. questions A. – L.

Please provide your approval and/or comments to the WDP, and the requested updated forms as soon as possible but no later than **close of business on Monday, November 10, 2025**. Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

If you are unable to submit the requested updates via STEERS, please be advised that an OP-CRO1 must also be provided to certify all these changes. If you are unable to provide updates in STEERS, please provide the signed document via email attachment and then follow-up with providing the original, wet-ink Form OP-CRO1 document via overnight delivery.

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

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

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

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. 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 were 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](#).

Finally, per the note provided on the cover letter for this renewal application “...the Paris plant is scheduled to be closed and permanently shutdown as of June 30, 2026”, please be advised that once this renewal is issued and the site is shutdown, a Void application will need to be submitted via STEERS for SOP No. O1781.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
[\(512\) 239-3373](tel:(512)239-3373)**



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**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
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date
ES-2400	106.473	9/4/2000
ES-2500	106.473	9/4/2000
Site Wide	106.472	9/4/2000
Site Wide	106.473	9/4/2000
Site Wide	106.474	9/4/2000
Site Wide	106.454	11/1/2001
Site Wide	106.261	11/1/2003
Site Wide	106.262	11/1/2003
Site Wide	106.263	11/1/2001
Site Wide	106.227	9/4/2000

**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
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date
Site Wide	106.265	9/4/2000
Site Wide	106.375	9/4/2000
Site Wide	106	9/23/1982
Site Wide	51	9/13/1993

**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
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
ES-2400	106.473	9/4/2000	Uncontrolled Emissions less than 25 tpy
			Loading rate not to exceed 20,000 gal/day over consecutive 30-day period
			Capacity of tank not to exceed 25,000 gallons
			Used exclusively for the loading, unloading, or storage of organic liquids
			normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers,
			enamels, varnishes, liquid resins or other surface coatings.

**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
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
ES-2500	106.473	9/4/2000	Uncontrolled Emissions less than 25 tpy
			Loading rate not to exceed 20,000 gal/day over consecutive 30-day period
			Capacity of tank not to exceed 25,000 gallons
			Maintain records of materials stored
			Recordkeeping as required by 30 TAC 106.4
			Recordkeeping as required by 30 TAC 106.8

**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
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
Site Wide	106.472	9/4/2000	Maintain records of materials stored.
			Recordkeeping as required by 30 TAC 106.4
Site Wide	106.473	9/4/2000	Uncontrolled Emissions less than 25 tpy
			Loading rate not to exceed 20,000 gal/day over consecutive 30-day period
			Capacity of tank not to exceed 25,000 gallons
			Maintain records of materials stored
			Recordkeeping as required by 30 TAC 106.4
			Recordkeeping as required by 30 TAC 106.8

**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
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
Site Wide	106.474	9/4/2000	Maintain records of materials stored.
			Maintain records of SDS showing acid strength
Site Wide	106.454	11/1/2001	Maintain records of total solvent makeup
			Maintain records of solvent disposal
			Maintain records of solvent materials used
			Maintain records of all degreaser maintenance activities
			Maintain records of SDS showing vapor pressure

**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
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
Site Wide	106.261	11/1/2003	Maintain records of emissions in pounds per hour and tons per year for all
			listed materials.
			Maintain records of all new or increased emissions of any chemical having a
			limit value greater than 200 mg/m3.
			Maintain records of visible emissions.
			Recordkeeping as required by 30 TAC 106.4
			Recordkeeping as required by 30 TAC 106.8
Site Wide	106.262	11/1/2003	Maintain records of emissions using the formula $E = L/K$
			Recordkeeping as required by 30 TAC 106.4
			Recordkeeping as required by 30 TAC 106.8

**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
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
Site Wide	106.263	11/1/2001	Maintain records containing sufficient information to demonstrate compliance
			and must be separate and distinct records from records maintained for any
			other air authorization.
			Records for all maintenance, start-up or shutdown activities and temporary
			facilities must identify: 1) type and reason for the activity; 2) processes and
			equipment involved; 3) time, date and duration of the activity; 4) the air
			contaminants and amounts which are emitted as a result of the activity.
Site Wide	106.227	106.227	Maintain records of emissions of lead, when applicable
Site Wide	106.265	9/4/2000	Recordkeeping as required by 30 TAC 106.4
			Recordkeeping as required by 30 TAC 106.8



**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
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
Site Wide	106.375	9/4/2000	Maintain records of tank operating conditions to not exceed 1) temperature of
			100 degrees F or less and acid concentration of 19% by solution weight or less;
			2) a partial pressure of 0.5 milliliters of mercury or less
Site Wide	106	9/23/1982	Recordkeeping as required by 30 TAC 106.4
			Recordkeeping as required by 30 TAC 106.8
Site Wide	51	9/13/1993	Maintain records of materials loaded or unloaded
			Recordkeeping as required by 30 TAC 106.4
			Recordkeeping as required by 30 TAC 106.8

**From:** John Walker  
**Sent:** Friday, December 5, 2025 3:06 PM  
**To:** Mike Huff; Ifeoluwa Babarinde  
**Cc:** Mark Meyer  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good Afternoon Micheal,

I have a few comments on the Form OP-PBRUP Tables B and D provided.

1. "Site Wide" was listed for many of the Unit IDs. We have not allowed "Site Wide" as a Unit ID in the past. If there are no Unit IDs from the Title V permit to use, you may create your own Unit ID that represents how the site documents the unit.
2. For Standard Exemption (SE) 51, you have entered "Site Wide" as the Unit ID but Unit ID ES-2130 is documented as being authorized by SE 51 in the Title V draft permit. Please add the Unit ID "ES-2130" in place of "Site-wide" or confirm any other the necessary changes.
3. Please update the date in the top left of the form pages to reflect the submittal date (12/05/2025).

Please provide the requested information by close of business today, **12/05/2025**.

Please let me know if you have any questions.

Sincerely,

**John Walker**

Team Leader

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

John.Walker@tceq.texas.gov

Phone: (512) 239-1277



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---

**From:** Mike Huff <mhuff@silgancontainers.com>  
**Sent:** Friday, December 5, 2025 2:40 PM  
**To:** Ifeoluwa Babarinde <ifeoluwa.Babarinde@tceq.texas.gov>  
**Cc:** John Walker <John.Walker@tceq.texas.gov>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,  
Please find attached the update Forms B and D.

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <ifeoluwa.Babarinde@tceq.texas.gov>  
**Sent:** Tuesday, December 2, 2025 4:47 PM  
**To:** Mike Huff <mhuff@silgancontainers.com>  
**Cc:** John Walker <John.Walker@tceq.texas.gov>  
**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good afternoon,

During the final review for issuance of the renewal application for Silgan Containers Manufacturing Corporation, associated with Site Operating Permit (SOP) O1781 for their Paris Plant, the following items surfaced which require additional information and/or documentation. Please provide your responses and the requested information and/or documentation as appropriate, at your earliest opportunity, but please no later than **12/03/2025:**

1. The submitted Form OP-PBRSUP, contains several discrepancies. Please submit an updated Form OP-PBRSUP to addresses the following issues:
  - More than one Permit by Rule (PBR) was listed in the first row. Each individual PBR should be listed on a separate row with the corresponding version dates listed in the column directly in front of the associated PBR.

- The version dates listed for all the PBRs do not appear to be accurate compared to the TCEQ database. Version dates typically reflect the most recent effective date of the specific section of 30 TAC Chapter 106 under which the PBR was authorized. The effective version date format is usually (MM/DD/YYYY).
  - PBR 106.263 appears three separate times on different rows with some combinations of letters and numbers added to it. Please correct these errors so that PBR 106.263 is listed only once and ensure that any additional or incorrect characters are removed. The correct format for listing PBRs is generally 106.XXX with no letters or extra numbers appended.
  - Any units listed in the New Source Review Authorization References by Emissions Unit Table on page 12 of the Draft SOP that have PBRs as Preconstruction Authorizations should be documented on Table A (for registered PBRs) or Table B (for claimed PBRs) and Table D. The recently submitted form includes only Table C.
2. The currently authorized Responsible Official (RO) for the facility is Kerry Wild. However, the application appears to have been certified by James Berry as the RO. Please note that only the individual officially authorized as the RO or DAR is permitted to certify any application and related submittals. If you need a change of the Responsible Official, please submit an OP-CRO2. Please provide an electronic copy of the form followed by a hardcopy with a wet-ink signature.

As a reminder, application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO or DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. However, application updates that are provided through email or physical mail will require certification using an original signature OP-CRO1. I will request the final OP-CRO1 submittal at the proper time.

Please be sure to notify me whenever any updates are submitted via STEERS.

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

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
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MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
(512) 239-3373**



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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Sent:** Wednesday, November 26, 2025 10:50 AM  
**To:** Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,  
Attached please find the OP-PBRSUP along with a signed OP-CRO1.

I completely misread your email requesting this information by 11/24/2025. I was traveling last week for some reason thought it was 12/01/2025.

If you need anything additional please let me know,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>

**Sent:** Monday, November 17, 2025 3:14 PM

**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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Mr. Huff,

Thank you for your response.

Management has advised me that TCEQ has determined this renewal application as untimely as it was not submitted via STEERS 6-18 months prior to the expiration date of FOP O1781. The official received date is 10/10/2025. Please refer to the March 1, 2024, announcement stating that after January 1, 2023, for an application to be considered submitted, it must be submitted in STEERS. Please see the announcement at the following link: [Announcements for Title V Operating Permits - Texas Commission on Environmental Quality - www.tceq.texas.gov](#)

To issue this renewal project before the effective permit expires to avoid any non-compliance situations, please ensure that all requested information is provided by the requested due date/s. Also, the public notice and sign postings need to be published/posted as indicated below.

Accordingly, we are doing everything we can to help make sure the renewal is issued by the March 10, 2026 expiration date. To meet this date, the related English public notice and sign postings must be published/posted as soon as possible after the issuance of the Public Notice Authorization Package (PNAP), but no later than December 17, 2025. We plan to issue the PNAP as soon as possible but no later than December 3, 2025.

Please provide Form OP-PBR SUP at your earliest opportunity, but please no later than **11/24/2025**.

Also, the attachment you provided as the updated Form OP-1 still contained a "blank" Section X. Please include an updated Form OP-1 Section X with the Form OP-PBR SUP.

Yes, Form OP-PBR SUP, as well as all changes/updates made since the original renewal application, will need to be certified. I will request the final Form OP-CRO1 once the project has completed our internal QAQC process. I plan on sending the project to QAQC the day after receiving Forms OP-PBR SUP and OP-. Please be prepared to provide the final Form OP-CRO1 a day or two following the request.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087**

[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)

[\(512\) 239-3373](tel:(512)239-3373)



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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Sent:** Friday, November 14, 2025 4:50 PM

**To:** Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>

**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,

Sorry for the delay in responding, I have been out of the office for the past 2 weeks returning yesterday and did not yet see your email until now. The application was submitted on August 5, 2025 within the required time frame. I previously provided the proof of submittal to the apirt email address at the request of Sean Wheeler of TCEQ.

I have no issues with the WPD.

For Item 1 below, yes, the 3/23/2023 is the correct issuance date.

For Item 2, regarding the OP-PBR SUP, I will be traveling for business on Monday but will get that completed to you ASAP. Can you verify that a new OP-CRO1 will be required with the OP-PBR SUP.

For Item 3 regarding OP-1, I am not sure why it was blank unless it was due to the merger of pdf files. Attached is the completed Form.

If you need anything additional, please let me know,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Sent:** Wednesday, November 5, 2025 2:40 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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Good afternoon,

I have been assigned the submitted renewal application for Silgan Containers Manufacturing Corporation, associated with Site Operating Permit (SOP) O1781 for their Paris Plant. The application has been assigned Project No. 39229. The application is untimely as it was submitted on October 10, 2025, less than 6 months from the March 10, 2026, permit expiration.

I have completed the technical review and attached is the Working Draft Permit (WDP) for your review and approval, and/or comments. During the technical review process, the following items surfaced which must be addressed:

- 1) The indicated issuance date for NSR 21720 on the submitted Form OP-REQ1 is 8/1/2013. The NSR database indicates a renewal was issued 3/23/2023 (Project 352677). The 3/23/2023 issuance date appears to be the correct date to reference in the SOP as part of this renewal project. Please confirm if 3/23/2023 should be used as the issuance date for NSR 21720. Please note the related permit face,



conditions, and MAERT associated with the 3/23/2023 issuance of the NSR 21720 renewal were provided as part of the SOP renewal application package.

- 2) The NSR database indicates the site has several active claimed Permit by Rule (PBRs) and claimed Standard Exemptions (SEs) being utilized at the site. As of August 1, 2020, Form OP-PBRSUP is required for all SOP renewal applications. It does not appear this form was submitted as part of the renewal application. Please submit a completed Form OP-PBRSUP (form is attached for convenience). Please note that all four Tables must be submitted and any PBR and/or SE that is listed on either Table A and/or Table B, must be also listed on Table D.
- 3) The submitted Form OP-1 Section X. contained no responses. Please submit an updated Form OP-1 (form is attached for convenience) with proper responses, as applicable, to Section X. questions A. – L.

Please provide your approval and/or comments to the WDP, and the requested updated forms as soon as possible but no later than **close of business on Monday, November 10, 2025.** Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

If you are unable to submit the requested updates via STEERS, please be advised that an OP-CRO1 must also be provided to certify all these changes. If you are unable to provide updates in STEERS, please provide the signed document via email attachment and then follow-up with providing the original, wet-ink Form OP-CRO1 document via overnight delivery.

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

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

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

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be

submitted with the WDP response. 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 were 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](#).

Finally, per the note provided on the cover letter for this renewal application "...the Paris plant is scheduled to be closed and permanently shutdown as of June 30, 2026", please be advised that once this renewal is issued and the site is shutdown, a Void application will need to be submitted via STEERS for SOP No. O1781.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
[\(512\) 239-3373](tel:(512)239-3373)**



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**From:** Mike Huff <mhuff@silgancontainers.com>  
**Sent:** Friday, December 5, 2025 2:40 PM  
**To:** Ifeoluwa Babarinde  
**Cc:** John Walker  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant  
**Attachments:** 751 25 Title V Renewal Application Form OP-PBRSUP Table B updated.pdf;  
751 25 Title V Renewal Application Form OP-PBRSUP Table D.pdf

Ifeoluwa,  
Please find attached the update Forms B and D.

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <Ifeoluwa.Babarinde@tceq.texas.gov>  
**Sent:** Tuesday, December 2, 2025 4:47 PM  
**To:** Mike Huff <mhuff@silgancontainers.com>  
**Cc:** John Walker <John.Walker@tceq.texas.gov>  
**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good afternoon,

During the final review for issuance of the renewal application for Silgan Containers Manufacturing Corporation, associated with Site Operating Permit (SOP) O1781 for their Paris Plant, the following items surfaced which require additional information and/or documentation. Please provide your responses and the requested information and/or documentation as appropriate, at your earliest opportunity, but please no later than **12/03/2025:**

1. The submitted Form OP-PBRSUP, contains several discrepancies. Please submit an updated Form OP-PBRSUP to addresses the following issues:
  - More than one Permit by Rule (PBR) was listed in the first row. Each individual PBR should be listed on a separate

row with the corresponding version dates listed in the column directly in front of the associated PBR.

- The version dates listed for all the PBRs do not appear to be accurate compared to the TCEQ database. Version dates typically reflect the most recent effective date of the specific section of 30 TAC Chapter 106 under which the PBR was authorized. The effective version date format is usually (MM/DD/YYYY).
- PBR 106.263 appears three separate times on different rows with some combinations of letters and numbers added to it. Please correct these errors so that PBR 106.263 is listed only once and ensure that any additional or incorrect characters are removed. The correct format for listing PBRs is generally 106.XXX with no letters or extra numbers appended.
- Any units listed in the New Source Review Authorization References by Emissions Unit Table on page 12 of the Draft SOP that have PBRs as Preconstruction Authorizations should be documented on Table A (for registered PBRs) or Table B (for claimed PBRs) and Table D. The recently submitted form includes only Table C.

2. The currently authorized Responsible Official (RO) for the facility is Kerry Wild. However, the application appears to have been certified by James Berry as the RO. Please note that only the individual officially authorized as the RO or DAR is permitted to certify any application and related submittals. If you need a change of the Responsible Official, please submit an OP-CRO2. Please provide an electronic copy of the form followed by a hardcopy with a wet-ink signature.

As a reminder, application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO or DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. However, application updates that are provided through email or physical mail will require certification using an original signature OP-CRO1. I will request the final OP-CRO1 submittal at the proper time.

Please be sure to notify me whenever any updates are submitted via STEERS.

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

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
(512) 239-3373**



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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Sent:** Wednesday, November 26, 2025 10:50 AM  
**To:** Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,  
Attached please find the OP-PBRSUP along with a signed OP-CRO1.

I completely misread your email requesting this information by 11/24/2025. I was traveling last week for some reason thought it was 12/01/2025.

If you need anything additional please let me know,

**D. Michael Huff**  
Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263

(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Sent:** Monday, November 17, 2025 3:14 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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Mr. Huff,

Thank you for your response.

Management has advised me that TCEQ has determined this renewal application as untimely as it was not submitted via STEERS 6-18 months prior to the expiration date of FOP O1781. The official received date is 10/10/2025. Please refer to the March 1, 2024, announcement stating that after January 1, 2023, for an application to be considered submitted, it must be submitted in STEERS. Please see the announcement at the following link: [Announcements for Title V Operating Permits - Texas Commission on Environmental Quality - www.tceq.texas.gov](https://www.tceq.texas.gov/announcements/title-v-operating-permits)

To issue this renewal project before the effective permit expires to avoid any non-compliance situations, please ensure that all requested information is provided by the requested due date/s. Also, the public notice and sign postings need to be published/posted as indicated below.

Accordingly, we are doing everything we can to help make sure the renewal is issued by the March 10, 2026 expiration date. To meet this date, the related English public notice and sign postings must be published/posted as soon as possible after the issuance of the Public Notice Authorization Package (PNAP), but no later than December 17, 2025. We plan to issue the PNAP as soon as possible but no later than December 3, 2025.

Please provide Form OP-PBRSUP at your earliest opportunity, but please no later than **11/24/2025**.

Also, the attachment you provided as the updated Form OP-1 still contained a “blank” Section X. Please include an updated Form OP-1 Section X with the Form OP-PBRSUP.

Yes, Form OP-PBRSUP, as well as all changes/updates made since the original renewal application, will need to be certified. I will request the final Form OP-CRO1 once the project has completed our internal QAQC process. I plan on sending the project to QAQC

the day after receiving Forms OP-PBRUP and OP-. Please be prepared to provide the final Form OP-CRO1 a day or two following the request.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
(512) 239-3373**



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**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Sent:** Friday, November 14, 2025 4:50 PM  
**To:** Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,  
Sorry for the delay in responding, I have been out of the office for the past 2 weeks returning yesterday and did not yet see your email until now. The application was submitted on August 5, 2025 within the required time frame. I previously provided the proof of submittal to the apirt email address at the request of Sean Wheeler of TCEQ.

I have no issues with the WPD.

For Item 1 below, yes, the 3/23/2023 is the correct issuance date.



For Item 2, regarding the OP-PBRSUP, I will be traveling for business on Monday but will get that completed to you ASAP. Can you verify that a new OP-CRO1 will be required with the OP-PBRSUP.

For Item 3 regarding OP-1, I am not sure why it was blank unless it was due to the merger of pdf files. Attached is the completed Form.

If you need anything additional, please let me know,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
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Paris, TX 75461  
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(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Sent:** Wednesday, November 5, 2025 2:40 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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Good afternoon,

I have been assigned the submitted renewal application for Silgan Containers Manufacturing Corporation, associated with Site Operating Permit (SOP) O1781 for their Paris Plant. The application has been assigned Project No. 39229. The application is untimely as it was submitted on October 10, 2025, less than 6 months from the March 10, 2026, permit expiration.

I have completed the technical review and attached is the Working Draft Permit (WDP) for your review and approval, and/or comments. During the technical review process, the following items surfaced which must be addressed:

- 1) The indicated issuance date for NSR 21720 on the submitted Form OP-REQ1 is 8/1/2013. The NSR database indicates a renewal was issued 3/23/2023 (Project

352677). The 3/23/2023 issuance date appears to be the correct date to reference in the SOP as part of this renewal project. Please confirm if 3/23/2023 should be used as the issuance date for NSR 21720. Please note the related permit face, conditions, and MAERT associated with the 3/23/2023 issuance of the NSR 21720 renewal were provided as part of the SOP renewal application package.

- 2) The NSR database indicates the site has several active claimed Permit by Rule (PBRs) and claimed Standard Exemptions (SEs) being utilized at the site. As of August 1, 2020, Form OP-PBRSUP is required for all SOP renewal applications. It does not appear this form was submitted as part of the renewal application. Please submit a completed Form OP-PBRSUP (form is attached for convenience). Please note that all four Tables must be submitted and any PBR and/or SE that is listed on either Table A and/or Table B, must be also listed on Table D.
- 3) The submitted Form OP-1 Section X. contained no responses. Please submit an updated Form OP-1 (form is attached for convenience) with proper responses, as applicable, to Section X. questions A. – L.

Please provide your approval and/or comments to the WDP, and the requested updated forms as soon as possible but no later than **close of business on Monday, November 10, 2025.** Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

If you are unable to submit the requested updates via STEERS, please be advised that an OP-CRO1 must also be provided to certify all these changes. If you are unable to provide updates in STEERS, please provide the signed document via email attachment and then follow-up with providing the original, wet-ink Form OP-CRO1 document via overnight delivery.

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

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

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

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. 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 were 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](#).

Finally, per the note provided on the cover letter for this renewal application "...the Paris plant is scheduled to be closed and permanently shutdown as of June 30, 2026", please be advised that once this renewal is issued and the site is shutdown, a Void application will need to be submitted via STEERS for SOP No. O1781.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)**

(512) 239-3373



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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
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
ES-2400	106.473	9/4/2000	Uncontrolled Emissions less than 25 tpy
			Loading rate not to exceed 20,000 gal/day over consecutive 30-day period
			Capacity of tank not to exceed 25,000 gallons
			Used exclusively for the loading, unloading, or storage of organic liquids
			normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers,
			enamels, varnishes, liquid resins or other surface coatings.

**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
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
ES-2500	106.473	9/4/2000	Uncontrolled Emissions less than 25 tpy
			Loading rate not to exceed 20,000 gal/day over consecutive 30-day period
			Capacity of tank not to exceed 25,000 gallons
			Maintain records of materials stored
			Recordkeeping as required by 30 TAC 106.4
			Recordkeeping as required by 30 TAC 106.8

**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
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
Site Wide	106.472	9/4/2000	Maintain records of materials stored.
			Recordkeeping as required by 30 TAC 106.4
Site Wide	106.473	9/4/2000	Uncontrolled Emissions less than 25 tpy
			Loading rate not to exceed 20,000 gal/day over consecutive 30-day period
			Capacity of tank not to exceed 25,000 gallons
			Maintain records of materials stored
			Recordkeeping as required by 30 TAC 106.4
			Recordkeeping as required by 30 TAC 106.8

**Permit By Rule Supplemental Table (Page 4)**  
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Date	Permit Number	Regulated Entity Number
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
Site Wide	106.474	9/4/2000	Maintain records of materials stored.
			Maintain records of SDS showing acid strength
Site Wide	106.454	11/1/2001	Maintain records of total solvent makeup
			Maintain records of solvent disposal
			Maintain records of solvent materials used
			Maintain records of all degreaser maintenance activities
			Maintain records of SDS showing vapor pressure



**Permit By Rule Supplemental Table (Page 4)**  
**Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area**  
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Date	Permit Number	Regulated Entity Number
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
Site Wide	106.261	11/1/2003	Maintain records of emissions in pounds per hour and tons per year for all
			listed materials.
			Maintain records of all new or increased emissions of any chemical having a
			limit value greater than 200 mg/m3.
			Maintain records of visible emissions.
			Recordkeeping as required by 30 TAC 106.4
			Recordkeeping as required by 30 TAC 106.8
Site Wide	106.262	11/1/2003	Maintain records of emissions using the formula $E = L/K$
			Recordkeeping as required by 30 TAC 106.4
			Recordkeeping as required by 30 TAC 106.8

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Date	Permit Number	Regulated Entity Number
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
Site Wide	106.263	11/1/2001	Maintain records containing sufficient information to demonstrate compliance
			and must be separate and distinct records from records maintained for any
			other air authorization.
			Records for all maintenance, start-up or shutdown activities and temporary
			facilities must identify: 1) type and reason for the activity; 2) processes and
			equipment involved; 3) time, date and duration of the activity; 4) the air
			contaminants and amounts which are emitted as a result of the activity.
Site Wide	106.227	106.227	Maintain records of emissions of lead, when applicable
Site Wide	106.265	9/4/2000	Recordkeeping as required by 30 TAC 106.4
			Recordkeeping as required by 30 TAC 106.8

**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
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
Site Wide	106.375	9/4/2000	Maintain records of tank operating conditions to not exceed 1) temperature of
			100 degrees F or less and acid concentration of 19% by solution weight or less;
			2) a partial pressure of 0.5 milliliters of mercury or less
Site Wide	106	9/23/1982	Recordkeeping as required by 30 TAC 106.4
			Recordkeeping as required by 30 TAC 106.8
Site Wide	51	9/13/1993	Maintain records of materials loaded or unloaded
			Recordkeeping as required by 30 TAC 106.4
			Recordkeeping as required by 30 TAC 106.8

**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
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date
ES-2400	106.473	9/4/2000
ES-2500	106.473	9/4/2000
Site Wide	106.472	9/4/2000
Site Wide	106.473	9/4/2000
Site Wide	106.474	9/4/2000
Site Wide	106.454	11/1/2001
Site Wide	106.261	11/1/2003
Site Wide	106.262	11/1/2003
Site Wide	106.263	11/1/2001
Site Wide	106.227	9/4/2000

**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
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date
Site Wide	106.265	9/4/2000
Site Wide	106.375	9/4/2000
Site Wide	106	9/23/1982
Site Wide	51	9/13/1993

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**To:** John Walker  
**Cc:** Ifeoluwa Babarinde; Mark Meyer  
**Subject:** RE: SOP Renewal Application for Silgan Containers (Project 39229, Permit O1781) - - Updated Form OP-PBRSUP Needed

Thank you.

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
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Paris, TX 75461

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(m) 903-249-0111

---

**From:** Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>

**Sent:** Wednesday, December 3, 2025 3:26 PM

**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Cc:** Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>

**Subject:** SOP Renewal Application for Silgan Containers (Project 39229, Permit O1781) - - Updated Form OP-PBRSUP Needed

**Importance:** High

Mr. Huff,

I am working with Mr. Babarinde with the technical review and processing of the submitted renewal application for Silgan Containers and their Paris Plant.

Thank you for providing the requested Form OP-PBRSUP. However, upon review of the submittal, a few items surfaced which need to be addressed. We left a voice message for you earlier this afternoon and would like to speak with you at your very earliest opportunity to discuss these findings. We feel it will be beneficial if we can discuss the items directly over the phone rather than through email.

As I know you are aware, time is very much of the essence as the application was untimely.

Please advise on a good time – and number – when we would be able to reach you via phone.

The necessary updated Form OP-PBRSUP needs to be provided tomorrow, if possible, but no later than Friday of this week.

Thank you.

Mark Meyer  
Air Permits Division - Operating Permits  
Texas Commission on Environmental Quality  
P.O. Box 13087, MC 163  
Austin, TX 78711-3087  
512.239.0445

[mark.meyer@tceq.texas.gov](mailto:mark.meyer@tceq.texas.gov)

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**From:** Mike Huff <mhuff@silgancontainers.com>  
**Sent:** Friday, December 5, 2025 9:14 AM  
**To:** Mark Meyer  
**Cc:** Ifeoluwa Babarinde  
**Subject:** RE: SOP Renewal Application for Silgan Containers (Project 39229, Permit O1781) - - Updated Form OP-PBRSUP Needed

I have one question regarding OP-PBRSUP. For the monitoring requirements of each PBR listed in Table B, does this include, for example, things like the limitations of materials, in 106.472 or just the recordkeeping of 106.4 and/or 106.8

Thanks,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Mark Meyer <Mark.Meyer@tceq.texas.gov>  
**Sent:** Wednesday, December 3, 2025 3:26 PM  
**To:** Mike Huff <mhuff@silgancontainers.com>  
**Cc:** Ifeoluwa Babarinde <Ifeoluwa.Babarinde@tceq.texas.gov>  
**Subject:** SOP Renewal Application for Silgan Containers (Project 39229, Permit O1781) - - Updated Form OP-PBRSUP Needed  
**Importance:** High

Mr. Huff,

I am working with Mr. Babarinde with the technical review and processing of the submitted renewal application for Silgan Containers and their Paris Plant.

Thank you for providing the requested Form OP-PBRSUP. However, upon review of the submittal, a few items surfaced which need to be addressed. We left a voice message for you earlier this afternoon and would like to speak with you at your very earliest opportunity to discuss these findings. We feel it will be beneficial if we can discuss the items directly over the phone rather than through email.

As I know you are aware, time is very much of the essence as the application was untimely.

Please advise on a good time – and number – when we would be able to reach you via phone.

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Thank you.

Mark Meyer  
Air Permits Division - Operating Permits  
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P.O. Box 13087, MC 163  
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512.239.0445  
[mark.meyer@tceq.texas.gov](mailto:mark.meyer@tceq.texas.gov)

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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
12/03/2025	O-1781	100225374

PBR No.	Version No./Date
106.472	9/4/00
106.473	9/4/00
106.474	9/4/00
106.454	11/1/01
106.261	11/1/03
106.262	11/1/03
106.263	11/1/01
106.227	9/4/00
106.265	9/4/00
106.375	9/4/00

**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
12/03/2025	O-1781	100225374

PBR No.	Version No./Date
106	9/23/82
51	9/13/93

**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
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
ES-2400	106.473	9/4/2000	Uncontrolled Emissions less than 25 tpy
			Loading rate not to exceed 20,000 gal/day over consecutive 30-day period
			Capacity of tank not to exceed 25,000 gallons
			Used exclusively for the loading, unloading, or storage of organic liquids
			normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers,
			enamels, varnishes, liquid resins or other surface coatings.



**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
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
ES-2500	106.473	9/4/2000	Uncontrolled Emissions less than 25 tpy
			Loading rate not to exceed 20,000 gal/day over consecutive 30-day period
			Capacity of tank not to exceed 25,000 gallons
			Used exclusively for the loading, unloading, or storage of organic liquids
			normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers,
			enamels, varnishes, liquid resins or other surface coatings.

**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
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date
ES-2400	106.473	9/4/2000
ES-2500	106.473	9/4/2000

**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
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date
ES-2400	106.473	9/4/2000
ES-2500	106.473	9/4/2000



**ENVIRONMENTAL SERVICES**

P.O. Box 40

Paris, Texas

Tel: 903.782.1263

Fax: 903.739.9255

March 3, 2025

TCEQ

Air Permits Division

Mail Code 163

Operating Permits Section

P.O. Box 13087

Austin, TX 78711-3087

**RE: Change of Responsible Official**  
Silgan Containers Manufacturing Corporation  
Account Number LA-0183P  
Permit Number O-01781  
Regulated Entity Number: RN100225374  
Customer Number: CN600360721  
Paris, Lamar County, Texas

Enclosed please find a completed form OP-CRO2, Change of Responsible Official Information for Silgan Containers Operating Permit Number O-01781.

If you need additional information or have further questions, please contact me at 903-782-1263.

A handwritten signature in black ink, appearing to be "D. Michael Huff", written in a cursive style.

**D. Michael Huff**  
Environmental Engineer

cc: Mr. James Berry - Paris  
File: 751.1.50

Air Branch  
MC 6EN-A  
Office of Compliance and Enforcement  
Dallas Regional Office  
U.S. Environmental Protection Agency  
1445 Ross Avenue  
Suite 1200  
Dallas, Texas 75202

Texas Commission on Environmental Quality  
Region 5  
2916 Teague Drive  
Tyler, Texas 75701-3734

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

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

<b>I. Identifying Information</b>
Account No.: LA-0193-P
Regulated Entity Number: RN 100225374
Customer Reference Number: CN 600360721
Permit Number: O-01781
Area Name: Paris Plant
Company: Silgan Containers Manufacturing Corporation
<b>II. Change Type</b>
Action Type: <input checked="" type="checkbox"/> New Appointment <input type="checkbox"/> Administrative Information Change
Contact Type (only one response accepted per form): <input checked="" type="checkbox"/> Responsible Official <input type="checkbox"/> Designated Representative ( <i>Acid Rain Program and/or CSAPR sources only</i> ) <input type="checkbox"/> Alternate Designated Representative ( <i>Acid Rain Program and/or CSAPR sources only</i> )

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

<b>III. Responsible Official/Designated Representative/Alternate Designated Representative Information</b>
Conventional Title: <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.
Name (Driver's License/STEERS): James Berry
Title: Plant Manager
Appointment Effective Date: 09/01/24
Telephone Number: 903-739-9104
Fax Number.: 903-739-9327
Company Name: Silgan Containers Manufacturing Corporation
Mailing Address: P.O. Box 40
City: Paris
State: Texas
ZIP Code: 75460
Email Address: jberry@silgancontainers.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, James Berry, certify that based on information and belief formed Reasonable inquiry, the statement and information stated above are true, accurate, and complete.

Signature: 

Signature Date: 3/6/25

**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: 100225374	
CN: 60360721	
Account No.: LA-0183-P	
Permit No.: O1781	
Project No.:	
Area Name: Paris Plant	
Company Name: Silgan Containers Manufacturing Corporation	
<b>II. Certification Type (Please mark appropriate box)</b>	
<input checked="" type="checkbox"/> Responsible Official Representative	<input type="checkbox"/> Duly Authorized Representative
<b>III. Submittal Type (Please mark appropriate box) (Only one response can be accepted per form)</b>	
<input type="checkbox"/> SOP/TOP Initial Permit Application	<input type="checkbox"/> Permit Revision, Renewal, or Reopening
<input type="checkbox"/> GOP Initial Permit Application	<input checked="" type="checkbox"/> Update to Permit Application
<input type="checkbox"/> Other:	



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

**IV. Certification of Truth**

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

I, James Berry certify that I am the Responsible Official (RO) DATE: 12/3/2025 (RO or DAR)

*(Certifier Name printed or typed)*

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: 12/03/2025

*(Date 1) (Date 2) (Date 3) (Date 4)*

*(Date 5) (Date 6)*

Signature:  Signature Date: 12/3/2025

Title: Plant Manager

**From:** Mark Meyer  
**Sent:** Wednesday, December 3, 2025 3:26 PM  
**To:** mhuff@silgancontainers.com  
**Cc:** Ifeoluwa Babarinde  
**Subject:** SOP Renewal Application for Silgan Containers (Project 39229, Permit O1781) - - Updated Form OP-PBRSUP Needed

**Importance:** High

Mr. Huff,

I am working with Mr. Babarinde with the technical review and processing of the submitted renewal application for Silgan Containers and their Paris Plant.

Thank you for providing the requested Form OP-PBRSUP. However, upon review of the submittal, a few items surfaced which need to be addressed. We left a voice message for you earlier this afternoon and would like to speak with you at your very earliest opportunity to discuss these findings. We feel it will be beneficial if we can discuss the items directly over the phone rather than through email.

As I know you are aware, time is very much of the essence as the application was untimely.

Please advise on a good time – and number – when we would be able to reach you via phone.

The necessary updated Form OP-PBRSUP needs to be provided tomorrow, if possible, but no later than Friday of this week.

Thank you.

Mark Meyer  
Air Permits Division - Operating Permits  
Texas Commission on Environmental Quality  
P.O. Box 13087, MC 163  
Austin, TX 78711-3087  
512.239.0445  
[mark.meyer@tceq.texas.gov](mailto:mark.meyer@tceq.texas.gov)

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**From:** Mike Huff <mhuff@silgancontainers.com>  
**Sent:** Wednesday, December 3, 2025 11:12 AM  
**To:** Ifeoluwa Babarinde  
**Cc:** John Walker  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant  
**Attachments:** 751 25 Title V Renewal Application Form OP-PBR SUP Table B-p.pdf; 751 25 Title V Renewal Application Form OP-PBR SUP Table C - page 1.pdf; 751 25 Title V Renewal Application Form OP-PBR SUP Table C - page 2-p.pdf; 751 25 Title V Renewal Application Form OP-PBR SUP Table D - page 1-p.pdf; 751 25 Title V Renewal Application Form OP-PBR SUP Table D - page 2-p.pdf; 751 25 Title V Renewal Application Form OP-CRO1 for OP-PBR SUP revised signed.pdf; 751 24 Berry change of RO Submittal signed.pdf

Please see attached documents and comments below in red for each requested update.

If you need anything additional please let me know,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <Ifeoluwa.Babarinde@tceq.texas.gov>  
**Sent:** Tuesday, December 2, 2025 4:47 PM  
**To:** Mike Huff <mhuff@silgancontainers.com>  
**Cc:** John Walker <John.Walker@tceq.texas.gov>  
**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good afternoon,

During the final review for issuance of the renewal application for Silgan Containers Manufacturing Corporation, associated with Site Operating Permit (SOP) O1781 for their Paris Plant, the following items surfaced which require additional information and/or documentation. Please provide your responses and the requested information and/or documentation as appropriate, at your earliest opportunity, but please no later than **12/03/2025:**

1. The submitted Form OP-PBRSUP, contains several discrepancies. Please submit an updated Form OP-PBRSUP to addresses the following issues:

- More than one Permit by Rule (PBR) was listed in the first row. Each individual PBR should be listed on a separate row with the corresponding version dates listed in the column directly in front of the associated PBR. **See attached updated forms. I previously listed them together because they are listed together in the current NSR permit.**
- The version dates listed for all the PBRs do not appear to be accurate compared to the TCEQ database. Version dates typically reflect the most recent effective date of the specific section of 30 TAC Chapter 106 under which the PBR was authorized. The effective version date format is usually (MM/DD/YYYY). **See attached for corrected dates. I mistakenly “assumed” from your first email that you wanted the most current dates for each PBR.**
- PBR 106.263 appears three separate times on different rows with some combinations of letters and numbers added to it. Please correct these errors so that PBR 106.263 is listed only once and ensure that any additional or incorrect characters are removed. The correct format for listing PBRs is generally 106.XXX with no letters or extra numbers appended. **See attached updated forms. I previously listed these are they are listed together in the current NSR permit.**
- Any units listed in the New Source Review Authorization References by Emissions Unit Table on page 12 of the Draft SOP that have PBRs as Preconstruction Authorizations should be documented on Table A (for registered PBRs) or Table B (for claimed PBRs) and Table D. The recently submitted form includes only Table C. **See attached Forms B and D along with updated Table C**

2. The currently authorized Responsible Official (RO) for the facility is Kerry Wild. However, the application appears to have been certified by James Berry as the RO. Please note that only the individual officially authorized as the RO or DAR is permitted to certify any application and related submittals. If you need a change of the Responsible Official, please submit an OP-CRO2. Please provide an electronic copy of the form followed by a hardcopy with a wet-ink signature. **The attached Form OP-CRO2 authorizing James Berry as the new RO was submitted to TCEQ**

**on March 6, 2025. It was also submitted to Steven Piper of TCEQ per his request via email on November 3, 2025.**

As a reminder, application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO or DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. However, application updates that are provided through email or physical mail will require certification using an original signature OP-CRO1. I will request the final OP-CRO1 submittal at the proper time.

**Attached is an updated OP-CRO1**

Please be sure to notify me whenever any updates are submitted via STEERS.

As indicated on Form OP-1, question IV.D, please remember the Federal Operating Permit (FOP) application and all application updates must be submitted to both EPA Region 6 at [R6AirPermitsTX@epa.gov](mailto:R6AirPermitsTX@epa.gov), and to the TCEQ regional office having jurisdiction over the facility. Related information can be found on our website at [Where to Submit FOP Applications and Permit-Related Documents](#) **Copies of each of the attached updates have been submitted to both USEPA Region 6 and TCEQ Region 5.**

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
(512) 239-3373**



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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Sent:** Wednesday, November 26, 2025 10:50 AM

**To:** Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>

**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,

Attached please find the OP-PBRSUP along with a signed OP-CRO1.

I completely misread your email requesting this information by 11/24/2025. I was traveling last week for some reason thought it was 12/01/2025.

If you need anything additional please let me know,

**D. Michael Huff**

Air Compliance Manager

Silgan Containers Manufacturing Corporation

P.O. Box 40

Paris, TX 75461

(w) 903-782-1263

(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>

**Sent:** Monday, November 17, 2025 3:14 PM

**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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

Mr. Huff,

Thank you for your response.

Management has advised me that TCEQ has determined this renewal application as untimely as it was not submitted via STEERS 6-18 months prior to the expiration date of FOP O1781. The official received date is 10/10/2025. Please refer to the March 1, 2024, announcement stating that after January 1, 2023, for an application to be considered submitted, it must be submitted in STEERS. Please see the announcement at the following link: [Announcements for Title V Operating Permits - Texas Commission on Environmental Quality - www.tceq.texas.gov](#)

To issue this renewal project before the effective permit expires to avoid any non-compliance situations, please ensure that all requested information is provided by the

requested due date/s. Also, the public notice and sign postings need to be published/posted as indicated below.

Accordingly, we are doing everything we can to help make sure the renewal is issued by the March 10, 2026 expiration date. To meet this date, the related English public notice and sign postings must be published/posted as soon as possible after the issuance of the Public Notice Authorization Package (PNAP), but no later than December 17, 2025. We plan to issue the PNAP as soon as possible but no later than December 3, 2025.

Please provide Form OP-PBRSUP at your earliest opportunity, but please no later than **11/24/2025**.

Also, the attachment you provided as the updated Form OP-1 still contained a “blank” Section X. Please include an updated Form OP-1 Section X with the Form OP-PBRSUP.

Yes, Form OP-PBRSUP, as well as all changes/updates made since the original renewal application, will need to be certified. I will request the final Form OP-CRO1 once the project has completed our internal QAQC process. I plan on sending the project to QAQC the day after receiving Forms OP-PBRSUP and OP-. Please be prepared to provide the final Form OP-CRO1 a day or two following the request.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087**

[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)

[\(512\) 239-3373](tel:(512)239-3373)



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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Sent:** Friday, November 14, 2025 4:50 PM

**To:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>

**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,

Sorry for the delay in responding, I have been out of the office for the past 2 weeks returning yesterday and did not yet see your email until now. The application was submitted on August 5, 2025 within the required time frame. I previously provided the proof of submittal to the apirt email address at the request of Sean Wheeler of TCEQ.

I have no issues with the WPD.

For Item 1 below, yes, the 3/23/2023 is the correct issuance date.

For Item 2, regarding the OP-PBRSUP, I will be traveling for business on Monday but will get that completed to you ASAP. Can you verify that a new OP-CRO1 will be required with the OP-PBRSUP.

For Item 3 regarding OP-1, I am not sure why it was blank unless it was due to the merger of pdf files. Attached is the completed Form.

If you need anything additional, please let me know,

**D. Michael Huff**

Air Compliance Manager

Silgan Containers Manufacturing Corporation

P.O. Box 40

Paris, TX 75461

(w) 903-782-1263

(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>

**Sent:** Wednesday, November 5, 2025 2:40 PM

**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>

**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant



Good afternoon,

I have been assigned the submitted renewal application for Silgan Containers Manufacturing Corporation, associated with Site Operating Permit (SOP) O1781 for their Paris Plant. The application has been assigned Project No. 39229. The application is untimely as it was submitted on October 10, 2025, less than 6 months from the March 10, 2026, permit expiration.

I have completed the technical review and attached is the Working Draft Permit (WDP) for your review and approval, and/or comments. During the technical review process, the following items surfaced which must be addressed:

- 1) The indicated issuance date for NSR 21720 on the submitted Form OP-REQ1 is 8/1/2013. The NSR database indicates a renewal was issued 3/23/2023 (Project 352677). The 3/23/2023 issuance date appears to be the correct date to reference in the SOP as part of this renewal project. Please confirm if 3/23/2023 should be used as the issuance date for NSR 21720. Please note the related permit face, conditions, and MAERT associated with the 3/23/2023 issuance of the NSR 21720 renewal were provided as part of the SOP renewal application package.
- 2) The NSR database indicates the site has several active claimed Permit by Rule (PBRs) and claimed Standard Exemptions (SEs) being utilized at the site. As of August 1, 2020, Form OP-PBRSUP is required for all SOP renewal applications. It does not appear this form was submitted as part of the renewal application. Please submit a completed Form OP-PBRSUP (form is attached for convenience). Please note that all four Tables must be submitted and any PBR and/or SE that is listed on either Table A and/or Table B, must be also listed on Table D.
- 3) The submitted Form OP-1 Section X. contained no responses. Please submit an updated Form OP-1 (form is attached for convenience) with proper responses, as applicable, to Section X. questions A. – L.

Please provide your approval and/or comments to the WDP, and the requested updated forms as soon as possible but no later than **close of business on Monday, November 10, 2025**. Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

If you are unable to submit the requested updates via STEERS, please be advised that an OP-CRO1 must also be provided to certify all these changes. If you are unable to provide updates in STEERS, please provide the signed document via email attachment and then follow-up with providing the original, wet-ink Form OP-CRO1 document via overnight delivery.

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

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

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

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. 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 were 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](#).

Finally, per the note provided on the cover letter for this renewal application "...the Paris plant is scheduled to be closed and permanently shutdown as of June 30, 2026", please be

advised that once this renewal is issued and the site is shutdown, a Void application will need to be submitted via STEERS for SOP No. O1781.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087**

[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)

[\(512\) 239-3373](tel:(512)239-3373)



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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
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
ES-2500	106.473	9/4/2000	Uncontrolled Emissions less than 25 tpy
			Loading rate not to exceed 20,000 gal/day over consecutive 30-day period
			Capacity of tank not to exceed 25,000 gallons
			Used exclusively for the loading, unloading, or storage of organic liquids
			normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers,
			enamels, varnishes, liquid resins or other surface coatings.

**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
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
ES-2400	106.473	9/4/2000	Uncontrolled Emissions less than 25 tpy
			Loading rate not to exceed 20,000 gal/day over consecutive 30-day period
			Capacity of tank not to exceed 25,000 gallons
			Used exclusively for the loading, unloading, or storage of organic liquids
			normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers,
			enamels, varnishes, liquid resins or other surface coatings.

**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
12/03/2025	O-1781	100225374

PBR No.	Version No./Date
106	9/23/82
51	9/13/93

**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
12/03/2025	O-1781	100225374

PBR No.	Version No./Date
106.472	9/4/00
106.473	9/4/00
106.474	9/4/00
106.454	11/1/01
106.261	11/1/03
106.262	11/1/03
106.263	11/1/01
106.227	9/4/00
106.265	9/4/00
106.375	9/4/00

**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
12/03/2025	O-1781	100225374

Unit ID No.	PBR No.	Version No./Date
ES-2400	106.473	9/4/2000
ES-2500	106.473	9/4/2000



**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: 100225374	
CN: 60360721	
Account No.: LA-0183-P	
Permit No.: O1781	
Project No.:	
Area Name: Paris Plant	
Company Name: Silgan Containers Manufacturing Corporation	
<b>II. Certification Type (Please mark appropriate box)</b>	
<input checked="" type="checkbox"/> Responsible Official Representative	<input type="checkbox"/> Duly Authorized Representative
<b>III. Submittal Type (Please mark appropriate box) (Only one response can be accepted per form)</b>	
<input type="checkbox"/> SOP/TOP Initial Permit Application	<input type="checkbox"/> Permit Revision, Renewal, or Reopening
<input type="checkbox"/> GOP Initial Permit Application	<input checked="" type="checkbox"/> Update to Permit Application
<input type="checkbox"/> Other:	

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

**IV. Certification of Truth**

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

I, James Berry certify that I am the Responsible Official (RO) of the facility designated by TCEQ as information for reference only.

*(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: 12/03/2025

*(Date 1) (Date 2) (Date 3) (Date 4)*

*(Date 5) (Date 6)*

Signature:  Signature Date: 12/3/2025

Title: Plant Manager



**ENVIRONMENTAL SERVICES**

P.O. Box 40

Paris, Texas

Tel: 903.782.1263

Fax: 903.739.9255

March 3, 2025

TCEQ

Air Permits Division

Mail Code 163

Operating Permits Section

P.O. Box 13087

Austin, TX 78711-3087

**RE: Change of Responsible Official**  
Silgan Containers Manufacturing Corporation  
Account Number LA-0183P  
Permit Number O-01781  
Regulated Entity Number: RN100225374  
Customer Number: CN600360721  
Paris, Lamar County, Texas

Enclosed please find a completed form OP-CRO2, Change of Responsible Official Information for Silgan Containers Operating Permit Number O-01781.

If you need additional information or have further questions, please contact me at 903-782-1263.

A handwritten signature in black ink, appearing to be "D. Michael Huff", written in a cursive style.

**D. Michael Huff**  
Environmental Engineer

cc: Mr. James Berry - Paris  
File: 751.1.50

Air Branch  
MC 6EN-A  
Office of Compliance and Enforcement  
Dallas Regional Office  
U.S. Environmental Protection Agency  
1445 Ross Avenue  
Suite 1200  
Dallas, Texas 75202

Texas Commission on Environmental Quality  
Region 5  
2916 Teague Drive  
Tyler, Texas 75701-3734

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

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

<b>I. Identifying Information</b>
Account No.: LA-0193-P
Regulated Entity Number: RN 100225374
Customer Reference Number: CN 600360721
Permit Number: O-01781
Area Name: Paris Plant
Company: Silgan Containers Manufacturing Corporation
<b>II. Change Type</b>
Action Type: <input checked="" type="checkbox"/> New Appointment <input type="checkbox"/> Administrative Information Change
Contact Type (only one response accepted per form): <input checked="" type="checkbox"/> Responsible Official <input type="checkbox"/> Designated Representative ( <i>Acid Rain Program and/or CSAPR sources only</i> ) <input type="checkbox"/> Alternate Designated Representative ( <i>Acid Rain Program and/or CSAPR sources only</i> )

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

<b>III. Responsible Official/Designated Representative/Alternate Designated Representative Information</b>
Conventional Title:
<input checked="" type="checkbox"/> Mr.
<input type="checkbox"/> Mrs.
<input type="checkbox"/> Ms.
<input type="checkbox"/> Dr.
Name (Driver's License/STEERS): James Berry
Title: Plant Manager
Appointment Effective Date: 09/01/24
Telephone Number: 903-739-9104
Fax Number.: 903-739-9327
Company Name: Silgan Containers Manufacturing Corporation
Mailing Address: P.O. Box 40
City: Paris
State: Texas
ZIP Code: 75460
Email Address: jberry@silgancontainers.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, James Berry, certify that based on information and belief formed Reasonable inquiry, the statement and information stated above are true, accurate, and complete.

Signature: 

Signature Date: 3/6/25

**From:** Ifeoluwa Babarinde  
**Sent:** Tuesday, December 2, 2025 4:47 PM  
**To:** Mike Huff  
**Cc:** John Walker  
**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good afternoon,

During the final review for issuance of the renewal application for Silgan Containers Manufacturing Corporation, associated with Site Operating Permit (SOP) O1781 for their Paris Plant, the following items surfaced which require additional information and/or documentation. Please provide your responses and the requested information and/or documentation as appropriate, at your earliest opportunity, but please no later than **12/03/2025:**

1. The submitted Form OP-PBRSUP, contains several discrepancies. Please submit an updated Form OP-PBRSUP to addresses the following issues:
  - More than one Permit by Rule (PBR) was listed in the first row. Each individual PBR should be listed on a separate row with the corresponding version dates listed in the column directly in front of the associated PBR.
  - The version dates listed for all the PBRs do not appear to be accurate compared to the TCEQ database. Version dates typically reflect the most recent effective date of the specific section of 30 TAC Chapter 106 under which the PBR was authorized. The effective version date format is usually (MM/DD/YYYY).
  - PBR 106.263 appears three separate times on different rows with some combinations of letters and numbers added to it. Please correct these errors so that PBR 106.263 is listed only once and ensure that any additional or incorrect characters are removed. The correct format for listing PBRs is generally 106.XXX with no letters or extra numbers appended.
  - Any units listed in the New Source Review Authorization References by Emissions Unit Table on page 12 of the Draft SOP that have PBRs as Preconstruction Authorizations should be documented on Table A (for registered PBRs) or Table B (for claimed PBRs) and Table D. The recently submitted form includes only Table C.

2. The currently authorized Responsible Official (RO) for the facility is Kerry Wild. However, the application appears to have been certified by James Berry as the RO. Please note that only the individual officially authorized as the RO or DAR is permitted to certify any application and related submittals. If you need a change of the Responsible Official, please submit an OP-CRO2. Please provide an electronic copy of the form followed by a hardcopy with a wet-ink signature.

As a reminder, application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO or DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. However, application updates that are provided through email or physical mail will require certification using an original signature OP-CRO1. I will request the final OP-CRO1 submittal at the proper time.

Please be sure to notify me whenever any updates are submitted via STEERS.

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

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087**

[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
[\(512\) 239-3373](tel:(512)239-3373)



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**From:** Mike Huff <mhuff@silgancontainers.com>  
**Sent:** Wednesday, November 26, 2025 10:50 AM  
**To:** Ifeoluwa Babarinde <ifeoluwa.Babarinde@tceq.texas.gov>  
**Cc:** John Walker <John.Walker@tceq.texas.gov>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,  
Attached please find the OP-PBR SUP along with a signed OP-CRO1.

I completely misread your email requesting this information by 11/24/2025. I was traveling last week for some reason thought it was 12/01/2025.

If you need anything additional please let me know,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

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**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Sent:** Monday, November 17, 2025 3:14 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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

Mr. Huff,

Thank you for your response.

Management has advised me that TCEQ has determined this renewal application as untimely as it was not submitted via STEERS 6-18 months prior to the expiration date of FOP O1781. The official received date is 10/10/2025. Please refer to the March 1, 2024, announcement stating that after January 1, 2023, for an application to be considered submitted, it must be submitted in STEERS. Please see the announcement at the following link: [Announcements for Title V Operating Permits - Texas Commission on Environmental Quality - www.tceq.texas.gov](#)

To issue this renewal project before the effective permit expires to avoid any non-compliance situations, please ensure that all requested information is provided by the requested due date/s. Also, the public notice and sign postings need to be published/posted as indicated below.

Accordingly, we are doing everything we can to help make sure the renewal is issued by the March 10, 2026 expiration date. To meet this date, the related English public notice and sign postings must be published/posted as soon as possible after the issuance of the Public Notice Authorization Package (PNAP), but no later than December 17, 2025. We plan to issue the PNAP as soon as possible but no later than December 3, 2025.

Please provide Form OP-PBR SUP at your earliest opportunity, but please no later than **11/24/2025**.

Also, the attachment you provided as the updated Form OP-1 still contained a “blank” Section X. Please include an updated Form OP-1 Section X with the Form OP-PBR SUP.

Yes, Form OP-PBR SUP, as well as all changes/updates made since the original renewal application, will need to be certified. I will request the final Form OP-CRO1 once the project has completed our internal QAQC process. I plan on sending the project to QAQC the day after receiving Forms OP-PBR SUP and OP-. Please be prepared to provide the final Form OP-CRO1 a day or two following the request.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
[\(512\) 239-3373](tel:(512)239-3373)**



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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>

**Sent:** Friday, November 14, 2025 4:50 PM

**To:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>

**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>

**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,

Sorry for the delay in responding, I have been out of the office for the past 2 weeks returning yesterday and did not yet see your email until now. The application was submitted on August 5, 2025 within the required time frame. I previously provided the proof of submittal to the apirt email address at the request of Sean Wheeler of TCEQ.

I have no issues with the WPD.

For Item 1 below, yes, the 3/23/2023 is the correct issuance date.

For Item 2, regarding the OP-PBRSUP, I will be traveling for business on Monday but will get that completed to you ASAP. Can you verify that a new OP-CRO1 will be required with the OP-PBRSUP.

For Item 3 regarding OP-1, I am not sure why it was blank unless it was due to the merger of pdf files. Attached is the completed Form.

If you need anything additional, please let me know,

**D. Michael Huff**

Air Compliance Manager

Silgan Containers Manufacturing Corporation

P.O. Box 40

Paris, TX 75461

(w) 903-782-1263

(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Sent:** Wednesday, November 5, 2025 2:40 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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

Good afternoon,

I have been assigned the submitted renewal application for Silgan Containers Manufacturing Corporation, associated with Site Operating Permit (SOP) O1781 for their Paris Plant. The application has been assigned Project No. 39229. The application is untimely as it was submitted on October 10, 2025, less than 6 months from the March 10, 2026, permit expiration.

I have completed the technical review and attached is the Working Draft Permit (WDP) for your review and approval, and/or comments. During the technical review process, the following items surfaced which must be addressed:

- 1) The indicated issuance date for NSR 21720 on the submitted Form OP-REQ1 is 8/1/2013. The NSR database indicates a renewal was issued 3/23/2023 (Project 352677). The 3/23/2023 issuance date appears to be the correct date to reference in the SOP as part of this renewal project. Please confirm if 3/23/2023 should be used as the issuance date for NSR 21720. Please note the related permit face, conditions, and MAERT associated with the 3/23/2023 issuance of the NSR 21720 renewal were provided as part of the SOP renewal application package.
- 2) The NSR database indicates the site has several active claimed Permit by Rule (PBRs) and claimed Standard Exemptions (SEs) being utilized at the site. As of August 1, 2020, Form OP-PBRSUP is required for all SOP renewal applications. It does not appear this form was submitted as part of the renewal application. Please submit a completed Form OP-PBRSUP (form is attached for convenience). Please note that all four Tables must be submitted and any PBR and/or SE that is listed on either Table A and/or Table B, must be also listed on Table D.
- 3) The submitted Form OP-1 Section X. contained no responses. Please submit an updated Form OP-1 (form is attached for convenience) with proper responses, as applicable, to Section X. questions A. – L.

Please provide your approval and/or comments to the WDP, and the requested updated forms as soon as possible but no later than **close of business on Monday, November 10, 2025**. Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

If you are unable to submit the requested updates via STEERS, please be advised that an OP-CRO1 must also be provided to certify all these changes. If you are unable to provide updates in STEERS, please provide the signed document via email attachment and then follow-up with providing the original, wet-ink Form OP-CRO1 document via overnight delivery.

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

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

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

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. 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 were 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](#).

Finally, per the note provided on the cover letter for this renewal application “...the Paris plant is scheduled to be closed and permanently shutdown as of June 30, 2026”, please be advised that once this renewal is issued and the site is shutdown, a Void application will need to be submitted via STEERS for SOP No. O1781.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
[\(512\) 239-3373](tel:(512)239-3373)**



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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
11/26/2025	O-1781	100225374

PBR No.	Version No./Date
106.472, 106.473, and/or 106.474	3/14/97
106.454	3/14/97
106.263 (c)(1)	6/27/25
106.263 (c)(2)	6/27/25
106.261	3/14/97
106.262	4/1/21
106.227	3/14/97
106.265	3/14/97
106.263 (c)(3) (A)	6/27/25
106.375	8/4/98

**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: 100225374	
CN: 60360721	
Account No.: LA-0183-P	
Permit No.: O1781	
Project No.:	
Area Name: Paris Plant	
Company Name: Silgan Containers Manufacturing Corporation	
<b>II. Certification Type (Please mark appropriate box)</b>	
<input checked="" type="checkbox"/> Responsible Official Representative	<input type="checkbox"/> Duly Authorized Representative
<b>III. Submittal Type (Please mark appropriate box) (Only one response can be accepted per form)</b>	
<input type="checkbox"/> SOP/TOP Initial Permit Application	<input type="checkbox"/> Permit Revision, Renewal, or Reopening
<input type="checkbox"/> GOP Initial Permit Application	<input checked="" type="checkbox"/> Update to Permit Application
<input type="checkbox"/> Other:	



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

**IV. Certification of Truth**

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

I, James Berry 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: 11/26/2025

*(Date 1)*

*(Date 2)*

*(Date 3)*

*(Date 4)*

*(Date 5)*

*(Date 6)*

Signature: 

Signature Date: 11/26/2025

Title: Plant Manager

**From:** Mike Huff <mhuff@silgancontainers.com>  
**Sent:** Wednesday, November 26, 2025 10:50 AM  
**To:** Ifeoluwa Babarinde  
**Cc:** John Walker  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant  
**Attachments:** 751 25 Title V Renewal Application Form OP-PBRSUP-p.pdf; 751 25 Title V Renewal Application Form OP-CRO1 for OP-PBRSUP signed.pdf  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Ifeoluwa,  
Attached please find the OP-PBRSUP along with a signed OP-CRO1.

I completely misread your email requesting this information by 11/24/2025. I was traveling last week for some reason thought it was 12/01/2025.

If you need anything additional please let me know,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <Ifeoluwa.Babarinde@tceq.texas.gov>  
**Sent:** Monday, November 17, 2025 3:14 PM  
**To:** Mike Huff <mhuff@silgancontainers.com>  
**Cc:** John Walker <John.Walker@tceq.texas.gov>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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

Mr. Huff,

Thank you for your response.

Management has advised me that TCEQ has determined this renewal application as untimely as it was not submitted via STEERS 6-18 months prior to the expiration date of

FOP O1781. The official received date is 10/10/2025. Please refer to the March 1, 2024, announcement stating that after January 1, 2023, for an application to be considered submitted, it must be submitted in STEERS. Please see the announcement at the following link: [Announcements for Title V Operating Permits - Texas Commission on Environmental Quality - www.tceq.texas.gov](https://www.tceq.texas.gov/announcements/Title-V-Operating-Permits)

To issue this renewal project before the effective permit expires to avoid any non-compliance situations, please ensure that all requested information is provided by the requested due date/s. Also, the public notice and sign postings need to be published/posted as indicated below.

Accordingly, we are doing everything we can to help make sure the renewal is issued by the March 10, 2026 expiration date. To meet this date, the related English public notice and sign postings must be published/posted as soon as possible after the issuance of the Public Notice Authorization Package (PNAP), but no later than December 17, 2025. We plan to issue the PNAP as soon as possible but no later than December 3, 2025.

Please provide Form OP-PBRSUP at your earliest opportunity, but please no later than **11/24/2025**.

Also, the attachment you provided as the updated Form OP-1 still contained a “blank” Section X. Please include an updated Form OP-1 Section X with the Form OP-PBRSUP.

Yes, Form OP-PBRSUP, as well as all changes/updates made since the original renewal application, will need to be certified. I will request the final Form OP-CRO1 once the project has completed our internal QAQC process. I plan on sending the project to QAQC the day after receiving Forms OP-PBRSUP and OP-. Please be prepared to provide the final Form OP-CRO1 a day or two following the request.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087**

[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
(512) 239-3373



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---

**From:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Sent:** Friday, November 14, 2025 4:50 PM  
**To:** Ifeoluwa Babarinde <[Ifeoluwa.Babarinde@tceq.texas.gov](mailto:Ifeoluwa.Babarinde@tceq.texas.gov)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,

Sorry for the delay in responding, I have been out of the office for the past 2 weeks returning yesterday and did not yet see your email until now. The application was submitted on August 5, 2025 within the required time frame. I previously provided the proof of submittal to the apirt email address at the request of Sean Wheeler of TCEQ.

I have no issues with the WPD.

For Item 1 below, yes, the 3/23/2023 is the correct issuance date.

For Item 2, regarding the OP-PBRSUP, I will be traveling for business on Monday but will get that completed to you ASAP. Can you verify that a new OP-CRO1 will be required with the OP-PBRSUP.

For Item 3 regarding OP-1, I am not sure why it was blank unless it was due to the merger of pdf files. Attached is the completed Form.

If you need anything additional, please let me know,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Sent:** Wednesday, November 5, 2025 2:40 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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

Good afternoon,

I have been assigned the submitted renewal application for Silgan Containers Manufacturing Corporation, associated with Site Operating Permit (SOP) O1781 for their Paris Plant. The application has been assigned Project No. 39229. The application is untimely as it was submitted on October 10, 2025, less than 6 months from the March 10, 2026, permit expiration.

I have completed the technical review and attached is the Working Draft Permit (WDP) for your review and approval, and/or comments. During the technical review process, the following items surfaced which must be addressed:

- 1) The indicated issuance date for NSR 21720 on the submitted Form OP-REQ1 is 8/1/2013. The NSR database indicates a renewal was issued 3/23/2023 (Project 352677). The 3/23/2023 issuance date appears to be the correct date to reference in the SOP as part of this renewal project. Please confirm if 3/23/2023 should be used as the issuance date for NSR 21720. Please note the related permit face, conditions, and MAERT associated with the 3/23/2023 issuance of the NSR 21720 renewal were provided as part of the SOP renewal application package.
- 2) The NSR database indicates the site has several active claimed Permit by Rule (PBRs) and claimed Standard Exemptions (SEs) being utilized at the site. As of August 1, 2020, Form OP-PBRSUP is required for all SOP renewal applications. It does not appear this form was submitted as part of the renewal application. Please submit a completed Form OP-PBRSUP (form is attached for convenience). Please note that all four Tables must be submitted and any PBR and/or SE that is listed on either Table A and/or Table B, must be also listed on Table D.
- 3) The submitted Form OP-1 Section X. contained no responses. Please submit an updated Form OP-1 (form is attached for convenience) with proper responses, as applicable, to Section X. questions A. – L.

Please provide your approval and/or comments to the WDP, and the requested updated forms as soon as possible but no later than **close of business on Monday, November 10,**

**2025.** Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

If you are unable to submit the requested updates via STEERS, please be advised that an OP-CRO1 must also be provided to certify all these changes. If you are unable to provide updates in STEERS, please provide the signed document via email attachment and then follow-up with providing the original, wet-ink Form OP-CRO1 document via overnight delivery.

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

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

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

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. 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 were 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](#).

Finally, per the note provided on the cover letter for this renewal application "...the Paris plant is scheduled to be closed and permanently shutdown as of June 30, 2026", please be advised that once this renewal is issued and the site is shutdown, a Void application will need to be submitted via STEERS for SOP No. O1781.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
(512) 239-3373**



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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
11/26/2025	O-1781	100225374

PBR No.	Version No./Date
106.472, 106.473, and/or 106.474	3/14/97
106.454	3/14/97
106.263 (c)(1)	6/27/25
106.263 (c)(2)	6/27/25
106.261	3/14/97
106.262	4/1/21
106.227	3/14/97
106.265	3/14/97
106.263 (c)(3) (A)	6/27/25
106.375	8/4/98



**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: 100225374
CN: 60360721
Account No.: LA-0183-P
Permit No.: O1781
Project No.:
Area Name: Paris Plant
Company Name: Silgan Containers Manufacturing Corporation
<b>II. Certification Type (Please mark appropriate box)</b>
<input checked="" type="checkbox"/> Responsible Official Representative <input type="checkbox"/> Duly Authorized Representative
<b>III. Submittal Type (Please mark appropriate box) (Only one response can be accepted per form)</b>
<input type="checkbox"/> SOP/TOP Initial Permit Application <input type="checkbox"/> Permit Revision, Renewal, or Reopening
<input type="checkbox"/> GOP Initial Permit Application <input checked="" type="checkbox"/> Update to Permit Application
<input type="checkbox"/> Other:

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

**IV. Certification of Truth**

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

I, James Berry 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: 11/26/2025

*(Date 1)*

*(Date 2)*

*(Date 3)*

*(Date 4)*

*(Date 5)*

*(Date 6)*

Signature: 

Signature Date: 11/26/2025

Title: Plant Manager

**From:** Ifeoluwa Babarinde  
**Sent:** Monday, November 17, 2025 3:14 PM  
**To:** Mike Huff  
**Cc:** John Walker  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Mr. Huff,

Thank you for your response.

Management has advised me that TCEQ has determined this renewal application as untimely as it was not submitted via STEERS 6-18 months prior to the expiration date of FOP O1781. The official received date is 10/10/2025. Please refer to the March 1, 2024, announcement stating that after January 1, 2023, for an application to be considered submitted, it must be submitted in STEERS. Please see the announcement at the following link: [Announcements for Title V Operating Permits - Texas Commission on Environmental Quality - www.tceq.texas.gov](https://www.tceq.texas.gov/announcements/title-v-operating-permits)

To issue this renewal project before the effective permit expires to avoid any non-compliance situations, please ensure that all requested information is provided by the requested due date/s. Also, the public notice and sign postings need to be published/posted as indicated below.

Accordingly, we are doing everything we can to help make sure the renewal is issued by the March 10, 2026 expiration date. To meet this date, the related English public notice and sign postings must be published/posted as soon as possible after the issuance of the Public Notice Authorization Package (PNAP), but no later than December 17, 2025. We plan to issue the PNAP as soon as possible but no later than December 3, 2025.

Please provide Form OP-PBRSUP at your earliest opportunity, but please no later than **11/24/2025**.

Also, the attachment you provided as the updated Form OP-1 still contained a "blank" Section X. Please include an updated Form OP-1 Section X with the Form OP-PBRSUP.

Yes, Form OP-PBRSUP, as well as all changes/updates made since the original renewal application, will need to be certified. I will request the final Form OP-CRO1 once the project has completed our internal QAQC process. I plan on sending the project to QAQC the day after receiving Forms OP-PBRSUP and OP-. Please be prepared to provide the final Form OP-CRO1 a day or two following the request.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
(512) 239-3373**



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

---

**From:** Mike Huff <mhuff@silgancontainers.com>  
**Sent:** Friday, November 14, 2025 4:50 PM  
**To:** Ifeoluwa Babarinde <Ifeoluwa.Babarinde@tceq.texas.gov>  
**Cc:** John Walker <John.Walker@tceq.texas.gov>; Mark Meyer <Mark.Meyer@tceq.texas.gov>  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Ifeoluwa,  
Sorry for the delay in responding, I have been out of the office for the past 2 weeks returning yesterday and did not yet see your email until now. The application was submitted on August 5, 2025 within the required time frame. I previously provided the proof of submittal to the apirt email address at the request of Sean Wheeler of TCEQ.

I have no issues with the WPD.

For Item 1 below, yes, the 3/23/2023 is the correct issuance date.

For Item 2, regarding the OP-PBRSUP, I will be traveling for business on Monday but will get that completed to you ASAP. Can you verify that a new OP-CRO1 will be required with the OP-PBRSUP.

For Item 3 regarding OP-1, I am not sure why it was blank unless it was due to the merger of pdf files. Attached is the completed Form.

If you need anything additional, please let me know,

**D. Michael Huff**

Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <[ifeoluwa.Babarinde@tceq.texas.gov](mailto:ifeoluwa.Babarinde@tceq.texas.gov)>  
**Sent:** Wednesday, November 5, 2025 2:40 PM  
**To:** Mike Huff <[mhuff@silgancontainers.com](mailto:mhuff@silgancontainers.com)>  
**Cc:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>; Mark Meyer <[Mark.Meyer@tceq.texas.gov](mailto:Mark.Meyer@tceq.texas.gov)>  
**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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

Good afternoon,

I have been assigned the submitted renewal application for Silgan Containers Manufacturing Corporation, associated with Site Operating Permit (SOP) O1781 for their Paris Plant. The application has been assigned Project No. 39229. The application is untimely as it was submitted on October 10, 2025, less than 6 months from the March 10, 2026, permit expiration.

I have completed the technical review and attached is the Working Draft Permit (WDP) for your review and approval, and/or comments. During the technical review process, the following items surfaced which must be addressed:

- 1) The indicated issuance date for NSR 21720 on the submitted Form OP-REQ1 is 8/1/2013. The NSR database indicates a renewal was issued 3/23/2023 (Project 352677). The 3/23/2023 issuance date appears to be the correct date to reference in the SOP as part of this renewal project. Please confirm if 3/23/2023 should be used as the issuance date for NSR 21720. Please note the related permit face, conditions, and MAERT associated with the 3/23/2023 issuance of the NSR 21720 renewal were provided as part of the SOP renewal application package.
- 2) The NSR database indicates the site has several active claimed Permit by Rule (PBRs) and claimed Standard Exemptions (SEs) being utilized at the site. As of

August 1, 2020, Form OP-PBRSUP is required for all SOP renewal applications. It does not appear this form was submitted as part of the renewal application. Please submit a completed Form OP-PBRSUP (form is attached for convenience). Please note that all four Tables must be submitted and any PBR and/or SE that is listed on either Table A and/or Table B, must be also listed on Table D.

- 3) The submitted Form OP-1 Section X. contained no responses. Please submit an updated Form OP-1 (form is attached for convenience) with proper responses, as applicable, to Section X. questions A. – L.

Please provide your approval and/or comments to the WDP, and the requested updated forms as soon as possible but no later than **close of business on Monday, November 10, 2025.** Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

If you are unable to submit the requested updates via STEERS, please be advised that an OP-CRO1 must also be provided to certify all these changes. If you are unable to provide updates in STEERS, please provide the signed document via email attachment and then follow-up with providing the original, wet-ink Form OP-CRO1 document via overnight delivery.

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

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

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

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. 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 were 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](#).

Finally, per the note provided on the cover letter for this renewal application "...the Paris plant is scheduled to be closed and permanently shutdown as of June 30, 2026", please be advised that once this renewal is issued and the site is shutdown, a Void application will need to be submitted via STEERS for SOP No. O1781.

Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
(512) 239-3373**



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**From:** Ifeoluwa Babarinde  
**Sent:** Monday, November 17, 2025 11:21 AM  
**To:** Mark Meyer  
**Subject:** Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good morning,

For the above referenced project, the applicant has stated that the application was submitted on August 5, 2025, which they indicate was within the required time frame. Applicant also stated that a proof of submittal was requested and submitted to your email.

However, the TCEQ received date according to the IMS is October 10, 2025, which is significantly later than the date the applicant is claiming.

Please advise on the reason for this discrepancy and how we should proceed. Your prompt response would be greatly appreciated.

Thank you.

Sincerely,

*Ifeoluwa Babarinde (x3373)*  
*Permit Reviewer - Title V*



**From:** Mike Huff <mhuff@silgancontainers.com>  
**Sent:** Friday, November 14, 2025 4:50 PM  
**To:** Ifeoluwa Babarinde  
**Cc:** John Walker; Mark Meyer  
**Subject:** RE: NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant  
**Attachments:** 751 25 Title V Renewal Application Form OP-1-p.pdf  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Ifeoluwa,  
Sorry for the delay in responding, I have been out of the office for the past 2 weeks returning yesterday and did not yet see your email until now. The application was submitted on August 5, 2025 within the required time frame. I previously provided the proof of submittal to the apirt email address at the request of Sean Wheeler of TCEQ.

I have no issues with the WPD.

For Item 1 below, yes, the 3/23/2023 is the correct issuance date.

For Item 2, regarding the OP-PBRSUP, I will be traveling for business on Monday but will get that completed to you ASAP. Can you verify that a new OP-CRO1 will be required with the OP-PBRSUP.

For Item 3 regarding OP-1, I am not sure why it was blank unless it was due to the merger of pdf files. Attached is the completed Form.

If you need anything additional, please let me know,

**D. Michael Huff**  
Air Compliance Manager  
Silgan Containers Manufacturing Corporation  
P.O. Box 40  
Paris, TX 75461  
(w) 903-782-1263  
(m) 903-249-0111

---

**From:** Ifeoluwa Babarinde <Ifeoluwa.Babarinde@tceq.texas.gov>  
**Sent:** Wednesday, November 5, 2025 2:40 PM

**To:** Mike Huff <mhuff@silgancontainers.com>

**Cc:** John Walker <John.Walker@tceq.texas.gov>; Mark Meyer <Mark.Meyer@tceq.texas.gov>

**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

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

Good afternoon,

I have been assigned the submitted renewal application for Silgan Containers Manufacturing Corporation, associated with Site Operating Permit (SOP) O1781 for their Paris Plant. The application has been assigned Project No. 39229. The application is untimely as it was submitted on October 10, 2025, less than 6 months from the March 10, 2026, permit expiration.

I have completed the technical review and attached is the Working Draft Permit (WDP) for your review and approval, and/or comments. During the technical review process, the following items surfaced which must be addressed:

- 1) The indicated issuance date for NSR 21720 on the submitted Form OP-REQ1 is 8/1/2013. The NSR database indicates a renewal was issued 3/23/2023 (Project 352677). The 3/23/2023 issuance date appears to be the correct date to reference in the SOP as part of this renewal project. Please confirm if 3/23/2023 should be used as the issuance date for NSR 21720. Please note the related permit face, conditions, and MAERT associated with the 3/23/2023 issuance of the NSR 21720 renewal were provided as part of the SOP renewal application package.
- 2) The NSR database indicates the site has several active claimed Permit by Rule (PBRs) and claimed Standard Exemptions (SEs) being utilized at the site. As of August 1, 2020, Form OP-PBRSUP is required for all SOP renewal applications. It does not appear this form was submitted as part of the renewal application. Please submit a completed Form OP-PBRSUP (form is attached for convenience). Please note that all four Tables must be submitted and any PBR and/or SE that is listed on either Table A and/or Table B, must be also listed on Table D.
- 3) The submitted Form OP-1 Section X. contained no responses. Please submit an updated Form OP-1 (form is attached for convenience) with proper responses, as applicable, to Section X. questions A. – L.

Please provide your approval and/or comments to the WDP, and the requested updated forms as soon as possible but no later than **close of business on Monday, November 10, 2025.** Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

If you are unable to submit the requested updates via STEERS, please be advised that an OP-CRO1 must also be provided to certify all these changes. If you are unable to provide updates in STEERS, please provide the signed document via email attachment and then

follow-up with providing the original, wet-ink Form OP-CRO1 document via overnight delivery.

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

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

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

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. 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 were not previously certified. I will advise you of this requirement prior to sending the Public Notice/Announcement Authorization.

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Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
(512) 239-3373**



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

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

<b>I. Company Identifying Information</b>
A. Company Name: Silgan Containers Manufacturing Corporation
B. Customer Reference Number (CN): CN 60360721
C. Submittal Date (mm/dd/yyyy): 07/29/2025
<b>II. Site Information</b>
A. Site Name: Paris Plant
B. Regulated Entity Reference Number (RN): <b>RN 100225374</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 checked="" type="checkbox"/> OK <input type="checkbox"/> N/A
D. Indicate all pollutants for which the site is a major source based on the site's potential to emit: <i>(Check the appropriate box[es].)</i>
<input 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 type="checkbox"/> HAPS
Other:
E. Is the site a non-major source subject to the Federal Operating Permit Program? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>
F. Is the site within a local program area jurisdiction? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>
G. Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>
H. Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:
<b>III. Permit Type</b>
A. Type of Permit Requested: <i>(Select only one response)</i>
<input checked="" type="checkbox"/> Site Operating Permit (SOP) <input type="checkbox"/> Temporary Operating Permit (TOP) <input type="checkbox"/> General Operating Permit (GOP)

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

<b>IV. Initial Application Information</b> <i>(Complete for Initial Issuance Applications Only.)</i>
<b>A.</b> Is this submittal an abbreviated or a full application? <span style="float: right;"><input type="checkbox"/> Abbreviated <input type="checkbox"/> Full</span>
<b>B.</b> If this is a full application, is the submittal a follow-up to an abbreviated application? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>
<b>C.</b> If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>
<b>D.</b> Has an electronic copy of this application been submitted (or is being submitted) to EPA? (Refer to the form instructions for additional information.) <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>
<b>E.</b> Has the required Public Involvement Plan been included with this application? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>
<b>V. Confidential Information</b>
<b>A.</b> Is confidential information submitted in conjunction with this application? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>
<b>VI. Responsible Official (RO) Identifying Information</b>
RO Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
RO Full Name: James Berry
RO Title: Plant Manager
Employer Name: Silgan Containers Manufacturing Corporation
Mailing Address: P.O. Box 40
City: Paris
State: TX
ZIP Code: 75461
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 903-739-9014
Fax No.: 903-739-9327
Email: jberry@silgancontainers.com

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

<b>VII. Technical Contact Identifying Information</b> <i>(Complete if different from RO.)</i>
Technical Contact Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Technical Contact Full Name: Mike Huff
Technical Contact Title: Manager of Air Compliance
Employer Name: Silgan Containers Manufacturing Corporation
Mailing Address: P.O. Box 40
City: Paris
State: TX
ZIP Code: 75461
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 903-782-1263
Fax No.:
Email: mhuff@silgancontainers.com
<b>VIII. Reference Only Requirements</b> <i>(For reference only.)</i>
<b>A.</b> State Senator: Bryan Hughes
<b>B.</b> State Representative: Gary VanDeaver
<b>C.</b> Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</span>
<b>D.</b> Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>
<b>E.</b> Indicate the alternate language(s) in which public notice is required:

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

<b>IX. Off-Site Permit Request</b> <i>(Optional for applicants requesting to hold the FOP and records at an off-site location.)</i>
<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>B.</b> Physical Address:
City:
State:
ZIP Code:
<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>H.</b> Longitude (nearest second):
<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 type="checkbox"/> No</span>
<b>J.</b> Indicate the estimated number of emission units in the application area:
<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 type="checkbox"/> No</span>
<b>L.</b> Affected Source Plant Code (or ORIS/Facility Code):
<b>XI. Public Notice</b> <i>(Complete this section for SOP Applications and Acid Rain Permit Applications only.)</i>
<b>A.</b> Name of a public place to view application and draft permit: Paris Public Library
<b>B.</b> Physical Address: 326 S. Main Street
City: Paris
ZIP Code: 75460
<b>C.</b> Contact Person (Someone who will answer questions from the public during the public notice period):
Contact Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.):
Contact Person Full Name: Mike Huff
Contact Mailing Address: P.O. Box 40
City: Paris
State: TX
ZIP Code: 75461
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 903-782-1263

**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**

**From:** Ifeoluwa Babarinde  
**Sent:** Friday, November 14, 2025 3:12 PM  
**To:** mhuff@silgancontainers.com  
**Cc:** John Walker  
**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant

Good morning,

A response on the Working Draft Permit was due 11/10/2025 but I have not received a response. Please provide a response to my 11/05/2025 email regarding the Working Draft Permit by close of business today, **11/14/2025**.

Sincerely,

*Ifeoluwa Babarinde*

**Environmental Permit Specialist  
Operating Permits Section (Title V)  
Air Permits Division  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
[\(512\) 239-3373](tel:(512)239-3373)**



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**From:** Ifeoluwa Babarinde  
**Sent:** Wednesday, November 5, 2025 2:40 PM  
**To:** mhuff@silgancontainers.com  
**Cc:** John Walker; Mark Meyer  
**Subject:** NOD/RFI - Technical Review -- SOP O1781/Project 39229, Silgan Containers Manufacturing Corporation/Paris Plant  
**Attachments:** SOP - O1781 Silgan Containers Manufacturing Corporation (SOP Renewal, 39229).docx; OP-1\_TCEQ Form 10002.pdf; OP-PBRSUP.pdf

Good afternoon,

I have been assigned the submitted renewal application for Silgan Containers Manufacturing Corporation, associated with Site Operating Permit (SOP) O1781 for their Paris Plant. The application has been assigned Project No. 39229. The application is untimely as it was submitted on October 10, 2025, less than 6 months from the March 10, 2026, permit expiration.

I have completed the technical review and attached is the Working Draft Permit (WDP) for your review and approval, and/or comments. During the technical review process, the following items surfaced which must be addressed:

- 1) The indicated issuance date for NSR 21720 on the submitted Form OP-REQ1 is 8/1/2013. The NSR database indicates a renewal was issued 3/23/2023 (Project 352677). The 3/23/2023 issuance date appears to be the correct date to reference in the SOP as part of this renewal project. Please confirm if 3/23/2023 should be used as the issuance date for NSR 21720. Please note the related permit face, conditions, and MAERT associated with the 3/23/2023 issuance of the NSR 21720 renewal were provided as part of the SOP renewal application package.
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Please do not hesitate to contact me should you have any questions.

Thank you.

Sincerely,

*Ifeoluwa Babarinde*

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Air Permits Division  
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[Ifeoluwa.babarinde@tceq.texas.gov](mailto:Ifeoluwa.babarinde@tceq.texas.gov)  
[\(512\) 239-3373](tel:(512)239-3373)**



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**ENVIRONMENTAL SERVICES**

P.O. Box 40

Paris, Texas

Tel: 903.782.1263

August 27, 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: **Federal Operating Permit Renewal**  
**Permit No. O-01781**  
**Silgan Containers Manufacturing Corporation, Paris, Texas**  
**Lamar County**  
**Account No. LA-0183-P**  
**Regulated Entity Number: RN100225374**  
**Customer Reference Number: CN600132013**

Federal Operating Permit No. O-01781 for Silgan Containers Manufacturing Corporation expires on March 10, 2026.  
Enclosed is the renewal application and supporting documentation.

Please be advised the Paris plant is scheduled to be closed and permanently shutdown as of June 30, 2026.

If you need additional information or have any questions regarding this submittal, please contact me at 903-782-1263.

A handwritten signature in black ink, appearing to be "D. Michael Huff".

D. Michael Huff  
Air Compliance Manager

cc: Mr. James Berry - Paris  
File: 751.1.22

TCEQ Region 5  
2916 Teague Drive  
Tyler, TX 75701-3734

USEPA  
R6AirPermitsTX@epa.gov





**AIR QUALITY  
TITLE V OPERATING PERMIT  
RENEWAL APPLICATION**

**AUGUST 2025**

**Prepared for:**

SILGAN CONTAINERS MANUFACTURING CORPORATION  
P.O. Box 40  
500 N.W. Loop 286  
Paris, Texas 75460

**Submitted to:**



**Office of Air Quality  
12124 Park 35 Circle  
Austin, Texas 78753**

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### APPENDIX

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- A SOURCE LISTING
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### FIGURES

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- 1 SITE LOCATION MAP
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- 4 THREE– PIECE CAN ASSEMBLY PROCESS FLOW DIAGRAM

## **1.0 INTRODUCTION AND PROJECT IDENTIFICATION INFORMATION**

Silgan Containers Manufacturing Corporation (Silgan) (TCEQ Account No. LA-0183P) owns and operates a food can manufacturing facility in Paris, Lamar County, Texas. Lamar County is currently designated as an attainment area for all criteria pollutants. Silgan purchased these manufacturing operations from Campbell Soup Company (TCEQ Account No. LA-0005R) in 1998. Silgan and Campbell Soup requested and were granted a Single Property Designation by the TCEQ on September 29, 1999 (See Appendix H). A site location map is provided in Figure 1, and a plot plan is provided in Figure 2. Two types of processes are utilized in the manufacturing of cans at the Paris Plant: a Drawn and Ironed two-piece process and a three-piece can assembly process. Process flow diagrams are provided in Figures 3, and 4.

The Paris plant is a minor source as defined in 30 TAC §52.21 (b)(1)(i)(b) because site-wide potential to emit Volatile Organic Compounds (VOC) is less than two hundred fifty (250) tons per year. The Paris plant is a Part 70 major source as defined in 30 TAC §122.10 (14)(A), (i),(ii) & (C) because site-wide potential to emit Volatile Organic Compounds (VOCs) from can manufacturing operations is greater than 100 and tons per year (tpy). The initial federal operating permit application was submitted in July 1998, and the permit was issued in February 2000.

Silgan is submitted this application for the purpose of:

- Renewal of the Federal Site Operating Permit to comply with the requirements in 30 TAC Chapter 122.

All Silgan can manufacturing operations are currently authorized by Air Quality Permit No. 21720 and Texas Operating Permit No. O-01781.

In accordance with 30 TAC §122, the following information is provided to ensure completeness of this application:

*Section 2.0* of this application provides a process description of the facility process authorized by this application.

*Section 3.0* contains the administrative forms required by this application.

*Section 4.0* contains the applicable requirements forms required by this application.

*Section 5.0* contains the compliance certification form required by this application.

Supporting documents are provided in the following appendices for reference purposes to assist the TCEQ in reviewing this application:

*Appendix A* contains a Source Listing of each source and its associated control device and emissions point.

*Appendix B* contains New Source Review Permit No. 21720.

## **2.0 PROCESS DESCRIPTION**

There are currently two processes used to produce steel food cans at the Paris Plant: a two-piece can manufacturing operation and a three-piece can assembly operation. These processes are discussed in the following subsections. Also discussed in the following subsections are ancillary pieces of equipment associated with the facility.

### **2.1 TWO-PIECE CAN MANUFACTURING**

A process flow diagram for the two-piece (Draw and Iron) can manufacturing process is provided in Figure 3.

For two-piece cans, the process begins with coil steel. The material is uncoiled and lubricated before going into a cupping press. The cups currently go to five bodymakers where they are ironed and drawn to the appropriate size and then trimmed to remove excess metal and washed. The cans are then flushed with water, rinsed with a caustic material, followed by a fresh water rinse and finally a deionized water rinse. The cans have an enamel “washcoat” applied to the outside and then are cured in a natural gas fired Washcoat heat-curing oven.

The “back end” of the process involves flanging the can to allow the end to be applied, beading the can for mechanical strength, and testing the can for integrity. Spray enamel is then applied via six Inside Spray Machines to the inside of the can. Each spray machine has two spray heads with one each nozzle. An Ink Dot system is then used to identify the specific spray machine used to coat the inside of the can. This Inside Spray Coating is then cured in a natural-gas fired Inside Bake Oven (IBO). A printed code for identification is then applied via Video Jet Ink Marking Applicators to each can. From there the cans go to storage, directly off-line to the co-located Campbell Soup Company (CSC) filling operation (food processing and can filling operations at the site are owned and operated by CSC) or directly off-line to various other off-site customers.

VOC emissions from both the outside (washcoat) and inside coating operations are vented to a Ross Air Systems regenerative thermal oxidizer. VOC emissions that are not collected in the VOC capture system leave the building through either dedicated vents or building roof ventilators. In addition to VOCs, the inside spray operation emits PM and the ovens and regenerative thermal oxidizer also emit products of combustion (POCs) from combustion of natural gas.

The existing inside spray machines are enclosed in a Permanent Total Enclosure (PTE) as defined by the USEPA in Method 204 *Criteria for and Verification of a Permanent or Temporary Total Enclosure* (See Appendix E). The PTE includes the spray machines and their respective discharge conveyors from the point of application to the infeed of the Inside Bake Oven (IBO). The PTE provides for one hundred percent (100%) capture efficiency from the Inside Spray operation. Previous source testing has shown that approximately twenty percent (20%) of the VOC emissions from the Washcoat application will be captured and exhausted to the proposed thermal oxidizer. Fugitive VOC emissions from the Washcoat process that are not collected in the VOC capture system will leave the building through either a dedicated vent or building roof ventilators. In addition to VOCs, both the Outside and Inside Bake ovens, as well as the Thermal Oxidizer emit products of combustion (POCs) from the combustion of natural gas. Fugitive VOCs are emitted from the Video Jet and Ink Dot Applicators.

The two-piece can manufacturing sources and control devices are identified by 2000-series numbers (i.e., numbers between 2000 and 2999), and their associated emission points are identified by 200-series numbers. A list of each source and its associated control device and emission point is provided in Appendix A.

## 2.2 THREE-PIECE CAN ASSEMBLY

A process flow diagram for the three-piece can assembly manufacturing process is provided in Figure 4.



The process of manufacturing three-piece welded cans begins with pre-coated metal sheets consisting of either tin plate or tin-free steel dependent upon customer requirements. In the forming of a three-piece can, the sheets are first fed into a slitter to cut the pre-coated steel sheets into metal strips. These strips are then cut into rectangular shaped "body blanks". The sheets, strips and body blanks are size specific as required for a particular can. The numbers of strips per sheet and body blanks per strip are also can specific.

The body blanks are then placed either manually or by automated stackers into a hopper for feeding into the bodymaker to begin forming the can. The bodymaker pulls each body blank individually from the bottom of the stack. The bodies are then transported to the section of the bodymaker known as the rounding station. In the rounding station, the body blanks are forced over three separate hardened steel pieces that break down the internal stress in the steel and form the body blank into a rounded cylinder. The cylinders are then transported by feed fingers to a device called the calibration unit. The calibration unit is several rollers precisely set through which the rounded cylinder passes, holding the cylinder to a pre-set diameter. The edge of the cylinder is transported to the calibration unit in a guide called a Z-bar. It is the combination of the Z-bar and the calibration unit that results in a precise overlap of the edges of the cylinder and an inside diameter that is maintained within approximately 0.002 inches. The overlap is set to approximately 0.020 inches. As the cylinder exits the Z-bar and calibration unit, the overlapped section of the cylinder passes between a set of current conducting rolls known as the welding rolls. The welding rolls are made of a soft material that is capable of conducting electrical current with very little resistance. The roll has a groove profiled in it to accommodate a flattened copper wire electrode that is actually the surface that contacts the cylinder. The rolls are forced together by a heavy spring that presses the overlapped edge of the cylinder together. Current is passed through the rolls and the edge of the cylinder is resistance welded together. The welding current is converted to a high frequency current by means of a frequency converter. The frequency converter uses normal 60 hertz current and converts it to 500 hertz current. Each time the frequency converter current peaks on the sine wave, a spot weld is

produced in the cylinder. Each spot weld is known as a weld nugget. The cylinder moves slowly enough in relation to the speed of the current that the weld nuggets are slightly overlapped, forming a welded side seam that is air tight. As the cylinder exits the welding rolls, the overlapped area of the weld is flooded with nitrogen gas for a very short length of time. The nitrogen prevents the weld from oxidizing and creating a weld slag.

As the welded cylinder exits the bodymaker, it enters the side seam stripe application area, where the weld area of the cylinder is sprayed with a liquid coating. This side seam stripe enamel is applied via air atomized spray to the inside of the cylinder about one-half inch wide. The side seam stripe is necessary to protect the inside of the can from product erosion. The spray is applied below an extraction hood which is designed to collect wet overspray that might occur. After collection, the wet over-spray is re-condensed in a custom designed diffuser box and collected for disposal. The air stream is also efficiently filtered in a three stage, progressive triple-filter system being exhausted through a dedicated stack that extends through the roof exhausting to the outside air. Approximately 80 percent of the VOCs are emitted through these dedicated stacks for each line. The remaining 20 percent are emitted through a building roof ventilator. The three stage filter system has a demonstrated average removal efficiency of 99.60%.

Immediately following the side seam stripe application, the cylinders pass through a Weld Monitor / Reject Station. The weld integrity is testing by measuring the current before and after the weld for comparison. The difference is then compared to a pre-determined and adjustable set of parameters the cylinder is either accepted for continued production or rejected.

The cylinders then enter either an electric induction or natural gas fired curing oven, depending on the customer requirements, that is designed to cure the enamel on the side seam. These ovens may vary in length dependent upon the type of side seam coating applied and the customer cure requirements. (See Source List in Appendix A). The air is directed vertically through an exhaust stack that extends above the roof.

The cylinders are then transferred to a Flanger that forms a flange on each end of the cylinder in preparation of the application of the end.

The flanged cylinders are then conveyed to a Beader that forms ridges in the cylinder along the circumference of the cylinder. These ridges, known as beads, give the final can the necessary strength to withstand the pressures exerted during the food preparation process.

The beaded cylinders are then conveyed to a Seamer that attaches one end on the cylinder. In the Seamer, the curl on the end is rolled around the flange of the cylinder forcing the end curl and cylinder flange into interlocking “J” shaped hooks by hardened steel rollers. A second set of rollers then tightens the seam to form an air-tight seal. The ends contain a rubbery material called compound that is applied inside the curl. This compound is used as a “gasket” material to seal any void that might be present in the seaming process.

The cylinders are then marked with a code for identification by a Videojet Printing System. The ink used changes color at a certain temperature which is necessary when the food in the can is processed by the customer. The printed code is applied without any parts of the printer contacting the cylinder. Each ink droplet is electrically charged and controlled in a magnetic field to form the characters that result on the cylinder. The code typically contains the following information: Silgan Logo, the date of production, including the hour and minute that the code was printed, and the Silgan facility where the can was manufactured.

The cans are then conveyed to a Tester whose only function is to air-test the cans for leaks. This is performed by introducing air into the can at about 10 psig while the can is held in a sealed pocket. The Tester then rejects any cans where leaks are detected.

After testing, the finished cans are either conveyed off-line to the co-located Campbell Soup food processing plant and can filling operations or to a palletizer and then to the warehouse for shipping to other off-site customers.

Three-piece can manufacturing sources and control devices are identified by 3000-series numbers, and their associated emission points are identified by 300-series numbers. A list of each three-piece can manufacturing source and its associated control device and emission point is provided in Appendix A

## 2.3 ANCILLARY EQUIPMENT

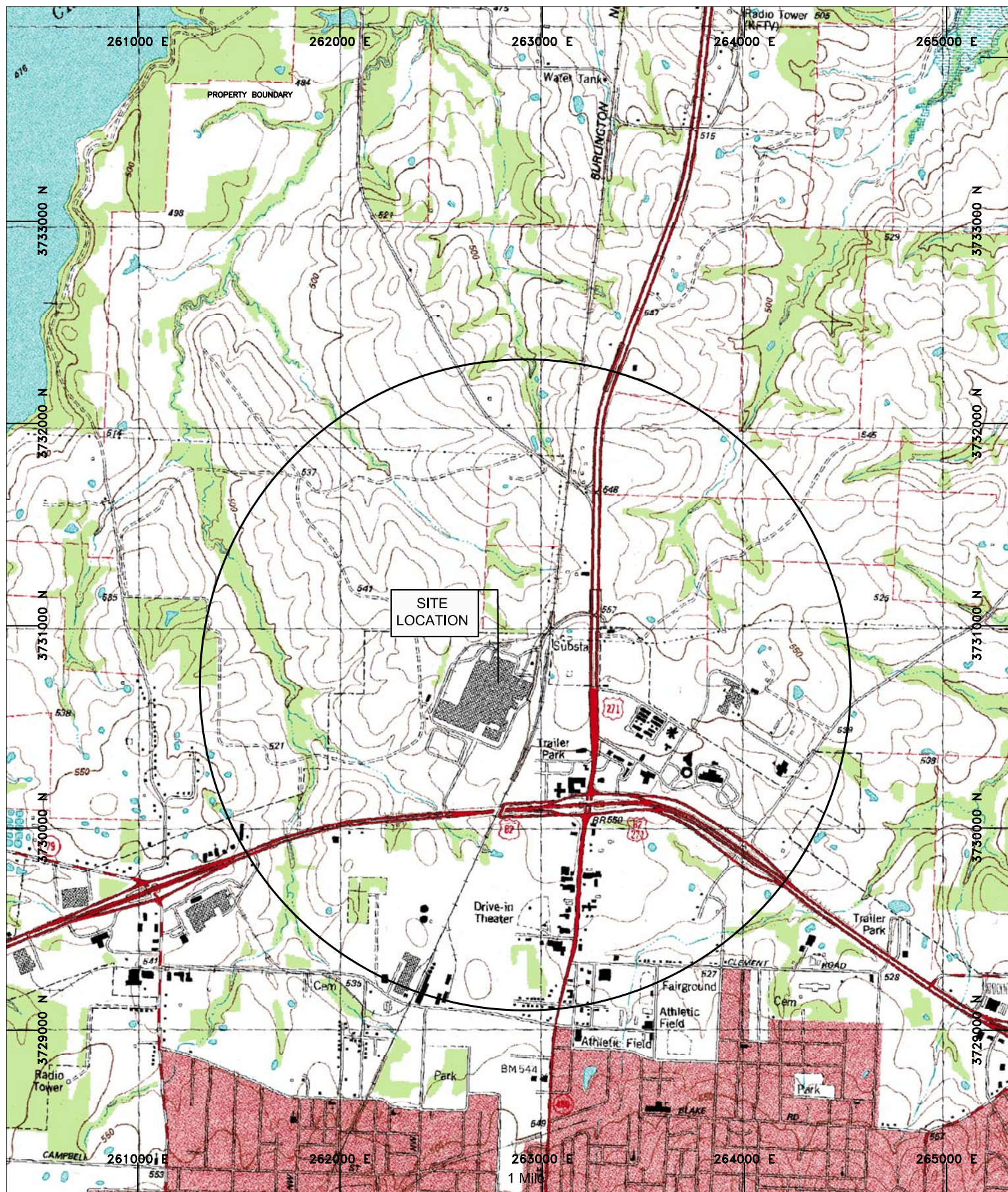
Ancillary equipment related to plant operations owned by Silgan at the Paris Plant include the following: several storage tanks used to store coatings and lubricants; several solvent degreasing machines (i.e., parts washers) used to remove dirt and grease from miscellaneous parts; one cooling tower used to cool process water; and two metal scrap handling units. The coatings storage tanks, cooling tower, parts washers, and scrap handling units are permitted. The storage tanks and parts washers emit VOCs, and the cooling tower and scrap handling units emit particulate matter (PM).

The lubrication tank is permitted by rule. The lubrication tank does not have a venting mechanism. The lubricant is mixed with potable water at a ratio of 95% water / 5% Lube prior to application. The application process is an enclosed system allowing the excess lubricant to be recirculated and reused. The only escape of lubricant is that washed into wastewater as the can is water rinsed. Due to extremely low vapor pressure typical of such lubricants and the method of application, Silgan believes that no calculable emissions exist and therefore the lube tank should not be included in the source listing. Parts Washers at the Paris Plant have a combined emission rate of 0.1 tons per year of VOC and these emissions are accounted for in the emissions from solvent cleaning processes.

## **SITE LOCATION MAP**



File: E:\clients\sage\Cambells Soup\PILOT PLAN.dwg Layout: AREAMAP User: Owner Plotted: Dec 30, 2009 - 4:06pm



1000 0 2000  
Scale 1" = 2000'



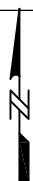
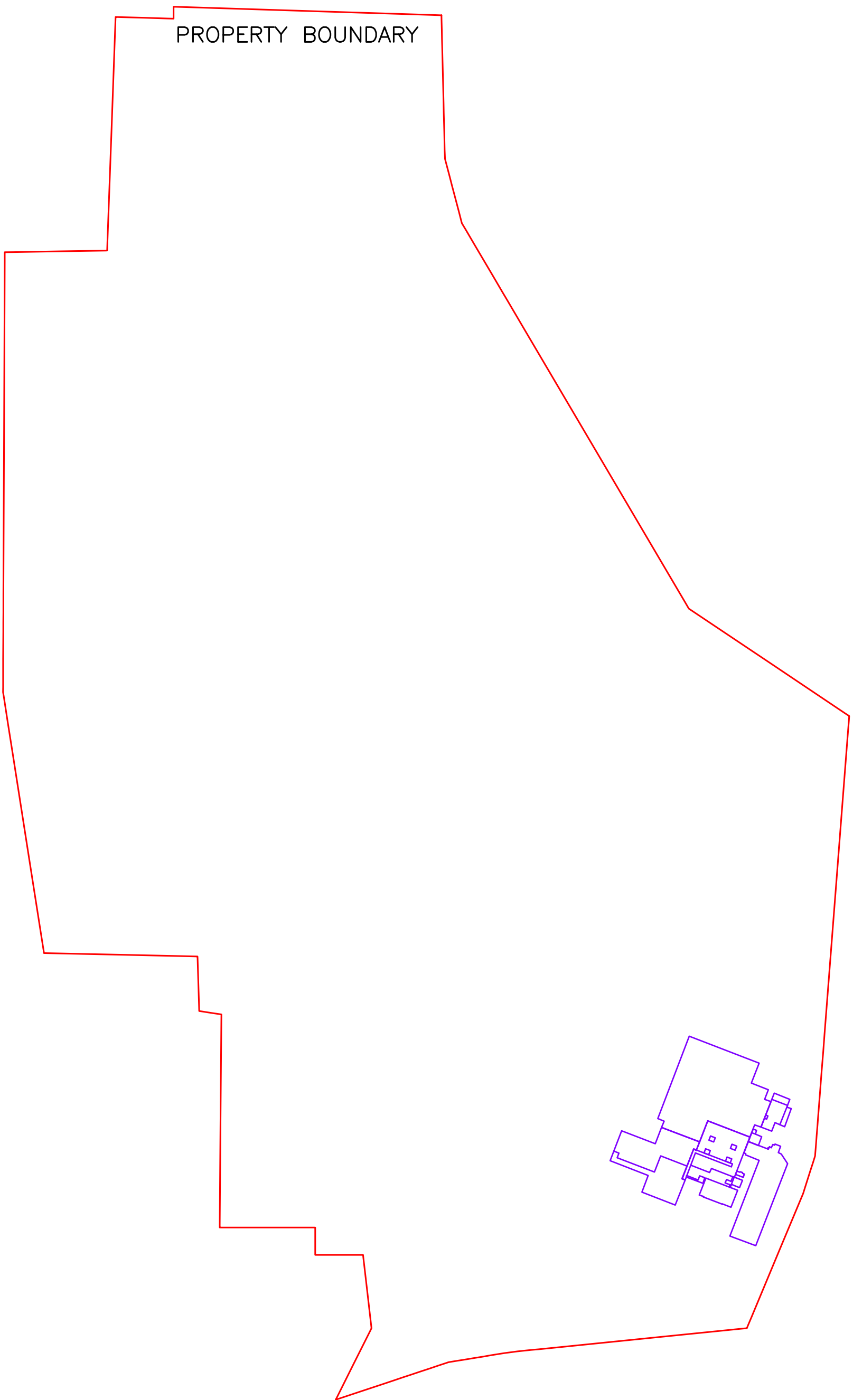
(USGS Map: Paris, TX, 1994, NAD27; TNRIS)

**SAGE**  
ENVIRONMENTAL CONSULTING

Plot Plan.dwg	FIGURE 1
Revision: 1	PARIS PLANT AREA MAP
DECEMBER 2009	SILGAN CONTAINERS



## **PLOT PLAN**



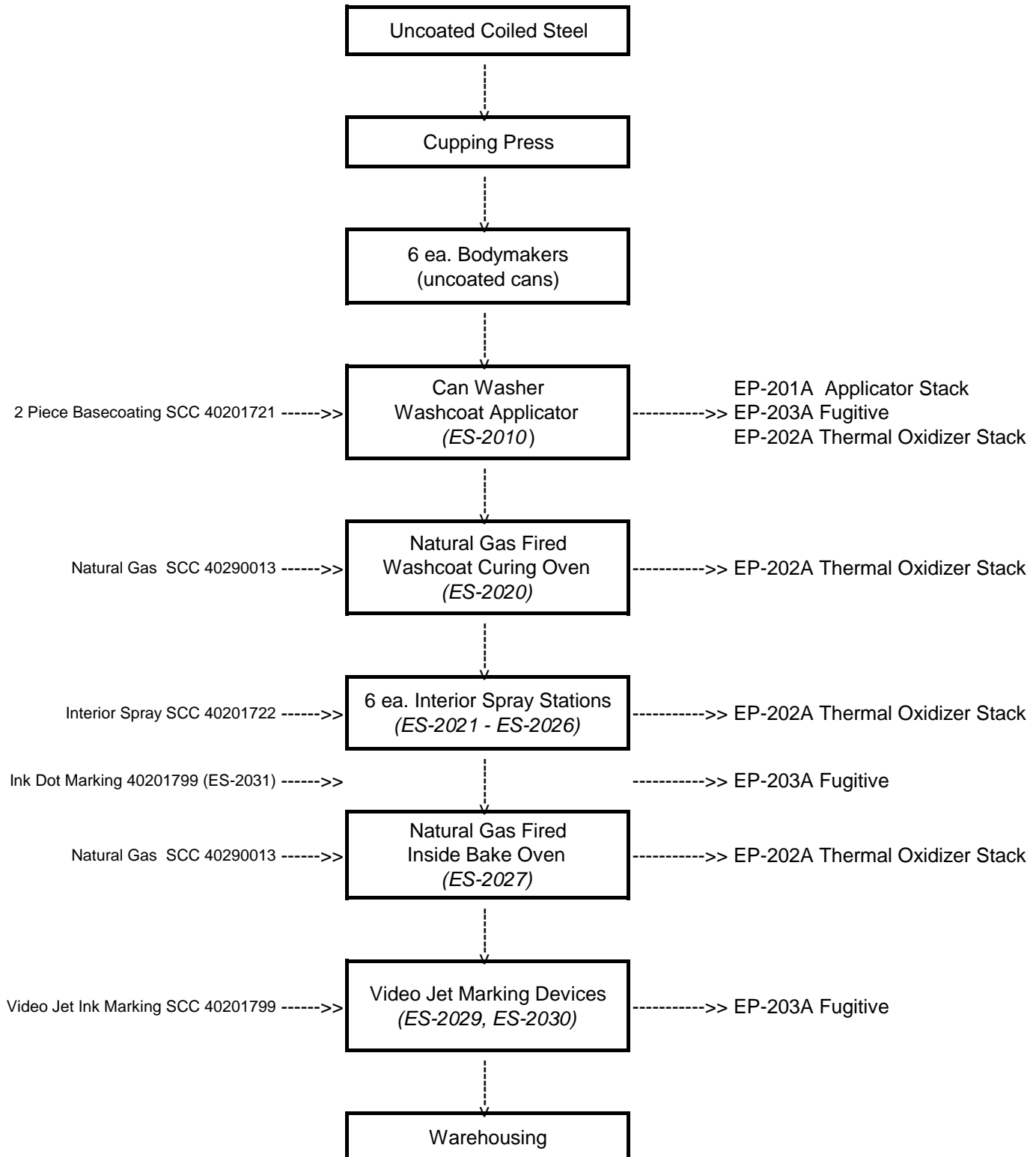
<i>Drawing:</i> Plot Plan.dwg	FIGURE 2
<i>Revision #:</i> 1	PARIS PLANT PLOT PLAN
<i>Date:</i> January 2010	SILGAN CONTAINERS



**D&I TWO-PIECE CAN MANUFACTURING PROCESS  
FLOW DIAGRAM**

**FIGURE 5**

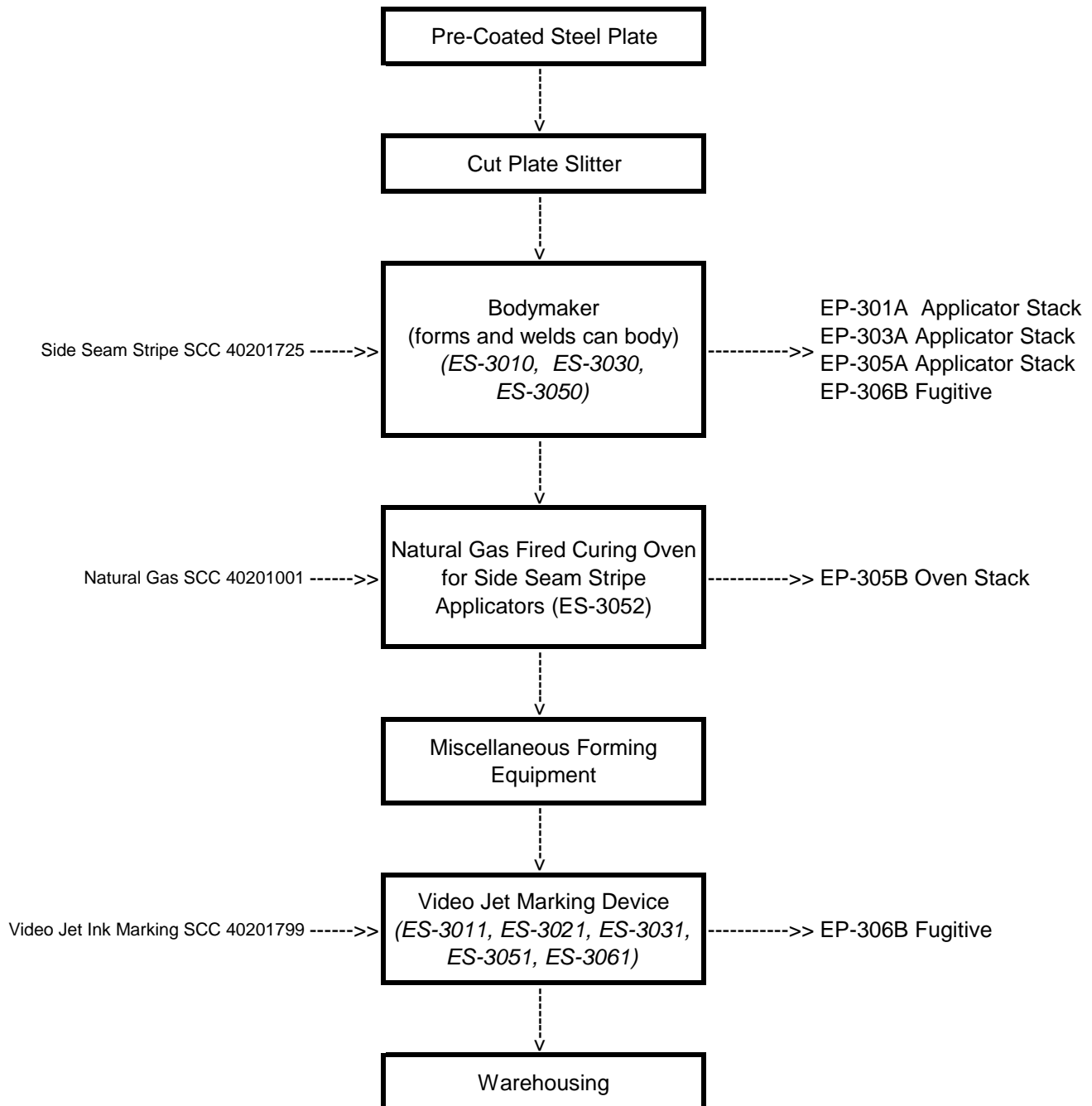
**D&I 2-Piece Can Manufacturing  
Process Flow Diagram**



**CAN ASSEMBLY THREE-PIECE CAN MANUFACTURING PROCESS  
FLOW DIAGRAM**

## FIGURE 6

### Can Assembly Process Flow Diagram



### **3.0 ADMINISTRATIVE FORMS**

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

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

<b>I. Company Identifying Information</b>
<b>A.</b> Company Name: Silgan Containers Manufacturing Corporation
<b>B.</b> Customer Reference Number (CN): CN 60360721
<b>C.</b> Submittal Date (mm/dd/yyyy): 07/29/2025
<b>II. Site Information</b>
<b>A.</b> Site Name: Paris Plant
<b>B.</b> Regulated Entity Reference Number (RN): <b>RN</b> 100225374
<b>C.</b> Indicate affected state(s) required to review permit application: <i>(Check the appropriate box[es].)</i>
<input type="checkbox"/> AR <input type="checkbox"/> CO <input type="checkbox"/> KS <input type="checkbox"/> LA <input type="checkbox"/> NM <input checked="" type="checkbox"/> OK <input type="checkbox"/> N/A
<b>D.</b> Indicate all pollutants for which the site is a major source based on the site's potential to emit: <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 type="checkbox"/> HAPS
Other:
<b>E.</b> Is the site a non-major source subject to the Federal Operating Permit Program? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>F.</b> Is the site within a local program area jurisdiction? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>G.</b> Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>H.</b> Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:
<b>III. Permit Type</b>
<b>A.</b> Type of Permit Requested: <i>(Select only one response)</i>
<input checked="" type="checkbox"/> Site Operating Permit (SOP) <input type="checkbox"/> Temporary Operating Permit (TOP) <input type="checkbox"/> General Operating Permit (GOP)

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

<b>IV. Initial Application Information</b> <i>(Complete for Initial Issuance Applications Only.)</i>
<b>A.</b> Is this submittal an abbreviated or a full application? <span style="float: right;"><input type="checkbox"/> Abbreviated <input type="checkbox"/> Full</span>
<b>B.</b> If this is a full application, is the submittal a follow-up to an abbreviated application? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>
<b>C.</b> If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>
<b>D.</b> Has an electronic copy of this application been submitted (or is being submitted) to EPA? (Refer to the form instructions for additional information.) <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>
<b>E.</b> Has the required Public Involvement Plan been included with this application? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>
<b>V. Confidential Information</b>
<b>A.</b> Is confidential information submitted in conjunction with this application? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>
<b>VI. Responsible Official (RO) Identifying Information</b>
RO Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
RO Full Name: James Berry
RO Title: Plant Manager
Employer Name: Silgan Containers Manufacturing Corporation
Mailing Address: P.O. Box 40
City: Paris
State: TX
ZIP Code: 75461
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 903-739-9014
Fax No.: 903-739-9327
Email: jberry@silgancontainers.com

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

<b>VII. Technical Contact Identifying Information</b> <i>(Complete if different from RO.)</i>
Technical Contact Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Technical Contact Full Name: Mike Huff
Technical Contact Title: Manager of Air Compliance
Employer Name: Silgan Containers Manufacturing Corporation
Mailing Address: P.O. Box 40
City: Paris
State: TX
ZIP Code: 75461
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 903-782-1263
Fax No.:
Email: mhuff@silgancontainers.com
<b>VIII. Reference Only Requirements</b> <i>(For reference only.)</i>
<b>A.</b> State Senator: Bryan Hughes
<b>B.</b> State Representative: Gary VanDeaver
<b>C.</b> Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</span>
<b>D.</b> Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>
<b>E.</b> Indicate the alternate language(s) in which public notice is required:



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

<b>IX. Off-Site Permit Request</b> <i>(Optional for applicants requesting to hold the FOP and records at an off-site location.)</i>
<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>B.</b> Physical Address:
City:
State:
ZIP Code:
<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>H.</b> Longitude (nearest second):
<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 type="checkbox"/> No</span>
<b>J.</b> Indicate the estimated number of emission units in the application area:
<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 type="checkbox"/> No</span>
<b>L.</b> Affected Source Plant Code (or ORIS/Facility Code):
<b>XI. Public Notice</b> (Complete this section for SOP Applications and Acid Rain Permit Applications only.)
<b>A.</b> Name of a public place to view application and draft permit: Paris Public Library
<b>B.</b> Physical Address: 326 S. Main Street
City: Paris
ZIP Code: 75460
<b>C.</b> Contact Person (Someone who will answer questions from the public during the public notice period):
Contact Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.):
Contact Person Full Name: Mike Huff
Contact Mailing Address: P.O. Box 40
City: Paris
State: TX
ZIP Code: 75461
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 903-782-1263

**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**

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

Date: 09/03/2025	
Permit No.: O1781	
Regulated Entity No.: 100225374	
Company Name: Silgan Containers Manufacturing Corporation	
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 checked="" type="checkbox"/> Renewal	
<input 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 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: (Check the appropriate box[es].)
<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 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:
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:
<b>I. Significant Revision</b> <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? <span style="float: right;"><input type="checkbox"/> YES <input type="checkbox"/> NO</span>
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? <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 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

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

<b>Date:</b> 09/03/2025	<b>Regulated Entity No.:</b> 100225374	<b>Permit No.:</b> O1781
<b>Company Name:</b> Silgan Containers Manufacturing Corporation		<b>Area Name:</b> Paris 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:  As the responsible official it is my intent that all emission units shall continue to be in compliance with all applicable requirements they are currently in compliance with, and all emission units shall be in compliance by the compliance dates with any applicable requirements that become effective during the permit term.</p>	
<b>B. Compliance Certification - Statement for Units in Compliance*</b> (Indicate response by entering an "X" in the appropriate column)	
<b>1.</b> With the exception of those emission units listed in the Compliance Schedule section of this form (Part 2, below), and based, at minimum, on the compliance method specified in the associated applicable requirements, are all emission units addressed in this application in compliance with all their respective applicable requirements as identified in this application?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
<b>2.</b> Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>3.</b> If the response to Item B.2, above, is "Yes," indicate the total number of Part 2 attachments included in this submittal. <i>(For reference only)</i>	
<p><small>* For Site Operating Permits (SOPs), the complete application should be consulted for applicable requirements and their corresponding emission units when assessing compliance status. For General Operating Permits (GOPs), the application documentation, particularly Form OP-REQ1 should be consulted as well as the requirements contained in the appropriate General Permits portion of 30 TAC Chapter 122.</small></p> <p><small>Compliance should be assessed based, at a minimum, on the required monitoring, testing, record keeping, and/or reporting requirements, as appropriate, associated with the applicable requirement in question.</small></p>	

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

<b>Date:</b> 09/03/2025	<b>Regulated Entity No.:</b> 100225374	<b>Permit No.:</b> O1781
<b>Company Name:</b> Silgan Containers Manufacturing Corporation		<b>Area Name:</b> Paris Plant

**Part 2**

<b>A. Compliance Schedule</b>		
<p>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.</p>		
<b>1. Specific Non-Compliance Situation</b>		
Unit/Group/Process ID No.(s):		
SOP Index No.:		
Pollutant:		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
<b>3. Non-compliance Situation Description</b>		
<b>4. Corrective Action Plan Description</b>		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		

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

<b>Date:</b> 09/03/2025	<b>Regulated Entity No.:</b> 100225374	<b>Permit No.:</b> O1781
<b>Company Name:</b> Silgan Containers Manufacturing Corporation		<b>Area Name:</b> Paris Plant

**Part 2 (continued)**

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

**Reset Form**

## **4.0 APPLICABLE REQUIREMENTS**

# Application Area-Wide Applicability Determinations and General Information

## Form OP-REQ1 (Page 1)

### Federal Operating Permit Program Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
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For SOP applications, answer ALL questions unless otherwise directed.

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

◆ ons unless otherwise directed.

I. Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and		
A. Visible Emissions		
◆ 1.	The application area includes stationary vents constructed on or before January 31, 1972.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
◆ 2.	The application area includes stationary vents constructed after January 31, 1972. <i>If the responses to Questions I.A.1 and I.A.2 are both "No," go to Question I.A.6. If the response to Question I.A.1 is "No" and the response to Question I.A.2 is "Yes," go to Question I.A.4.</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
◆ 3.	The application area is opting to comply with the requirements for stationary vents constructed after January 31, 1972 for vents in the application area constructed on or before January 31, 1972.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
◆ 4.	All stationary vents are addressed on a unit specific basis.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆ 5.	Test Method 9 (40 CFR Part 60, Appendix A, Method 9 - Visual Determination of the Opacity of Emissions from Stationary Sources) is used to determine opacity of emissions in the application area.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
◆ 6.	The application area includes structures subject to 30 TAC § 111.111(a)(7)(A).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
◆ 7.	The application area includes sources, other than those specified in 30 TAC § 111.111(a)(1), (4), or (7), subject to 30 TAC § 111.111(a)(8)(A).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆ 8.	Emissions from units in the application area include contributions from uncombined water.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆ 9.	The application area is located in the City of El Paso, including Fort Bliss Military Reservation, and includes solid fuel heating devices subject to 30 TAC § 111.111(c).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A

# Application Area-Wide Applicability Determinations and General Information

## Form OP-REQ1 (Page 2)

### Federal Operating Permit Program

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For SOP applications, answer ALL questions unless otherwise directed.

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

<b>I. Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter (continued)</b>		
<b>B. Materials Handling, Construction, Roads, Streets, Alleys, and Parking Lots</b>		
1. Items a - d determine applicability of any of these requirements based on geographical location.		
◆	a. The application area is located within the city of El Paso.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆	b. The application area is located within the Fort Bliss Military Reservation, except areas specified in 30 TAC § 111.141.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆	c. The application area is located in the portion of Harris County inside the loop formed by Beltway 8.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆	d. The application area is located in the area of Nueces County outlined in Group II state implementation plan (SIP) for inhalable particulate matter adopted by the TCEQ on May 13, 1988.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<i>If there is any "Yes" response to Questions I.B.1.a - d, answer Questions I.B.2.a - d. If all responses to Questions I.B.1.a-d are "No," go to Section I.C.</i>		
2. Items a - d determine the specific applicability of these requirements.		
◆	a. The application area is subject to 30 TAC § 111.143.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆	b. The application area is subject to 30 TAC § 111.145.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆	c. The application area is subject to 30 TAC § 111.147.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆	d. The application area is subject to 30 TAC § 111.149.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>C. Emissions Limits on Nonagricultural Processes</b>		
◆	1. The application area includes a nonagricultural process subject to 30 TAC § 111.151.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	2. The application area includes a vent from a nonagricultural process that is subject to additional monitoring requirements. <i>If the response to Question I.C.2 is "No," go to Question I.C.4.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	3. All vents from nonagricultural process in the application area are subject to additional monitoring requirements.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

# Application Area-Wide Applicability Determinations and General Information

## Form OP-REQ1 (Page 3)

### Federal Operating Permit Program Texas Commission on Environmental Quality

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For SOP applications, answer ALL questions unless otherwise directed.

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

<b>I. Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter (continued)</b>		
<b>C. Emissions Limits on Nonagricultural Processes (continued)</b>		
4.	The application area includes oil or gas fuel-fired steam generators subject to 30 TAC §§ 111.153(a) and 111.153(c).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5.	The application area includes oil or gas fuel-fired steam generators that are subject to additional monitoring requirements. <i>If the response to Question I.C.5 is "No," go to Question I.C.7.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
6.	All oil or gas fuel-fired steam generators in the application area are subject to additional monitoring requirements.	<input type="checkbox"/> Yes <input type="checkbox"/> No
7.	The application area includes solid fossil fuel-fired steam generators subject to 30 TAC §§ 111.153(a) and 111.153(b).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
8.	The application area includes solid fossil fuel-fired steam generators that are subject to additional monitoring requirements. <i>If the response to Question I.C.8 is "No," go to Section I.D.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
9.	All solid fossil fuel-fired steam generators in the application area are subject to additional monitoring requirements.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>D. Emissions Limits on Agricultural Processes</b>		
1.	The application area includes agricultural processes subject to 30 TAC § 111.171.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>E. Outdoor Burning</b>		
◆ 1.	Outdoor burning is conducted in the application area. <i>If the response to Question I.E.1 is "No," go to Section II.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆ 2.	Fire training is conducted in the application area and subject to the exception provided in 30 TAC § 111.205.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 3.	Fires for recreation, ceremony, cooking, and warmth are used in the application area and subject to the exception provided in 30 TAC § 111.207.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 4.	Disposal fires are used in the application area and subject to the exception provided in 30 TAC § 111.209.	<input type="checkbox"/> Yes <input type="checkbox"/> No



# Application Area-Wide Applicability Determinations and General Information

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For SOP applications, answer ALL questions unless otherwise directed.

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<b>I. Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter (continued)</b>		
<b>E. Outdoor Burning (continued)</b>		
◆ 5.	Prescribed burning is used in the application area and subject to the exception provided in 30 TAC § 111.211.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 6.	Hydrocarbon burning is used in the application area and subject to the exception provided in 30 TAC § 111.213.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 7.	The application area has received the TCEQ Executive Director approval of otherwise prohibited outdoor burning according to 30 TAC § 111.215.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>II. Title 30 TAC Chapter 112 - Control of Air Pollution from Sulfur Compounds</b>		
<b>A. Temporary Fuel Shortage Plan Requirements</b>		
1.	The application area includes units that are potentially subject to the temporary fuel shortage plan requirements of 30 TAC §§ 112.15 - 112.18.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds</b>		
<b>A. Applicability</b>		
◆ 1.	The application area is located in the Houston/Galveston/Brazoria area, Beaumont/Port Arthur area, Dallas/Fort Worth area, El Paso area, or a covered attainment county as defined by 30 TAC § 115.10. <i>See instructions for inclusive counties. If the response to Question III.A.1 is "No," go to Section IV.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>B. Storage of Volatile Organic Compounds</b>		
◆ 1.	The application area includes storage tanks, reservoirs, or other containers capable of maintaining working pressure sufficient at all times to prevent any VOC vapor or gas loss to the atmosphere.	<input type="checkbox"/> Yes <input type="checkbox"/> No

# Application Area-Wide Applicability Determinations and General Information

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For SOP applications, answer ALL questions unless otherwise directed.

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III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)		
C. Industrial Wastewater		
1.	The application area includes affected VOC wastewater streams of an affected source category, as defined in 30 TAC § 115.140. <i>If the response to Question III.C.1 is "No" or "N/A," go to Section III.D.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
2.	The application area is located at a petroleum refinery in the Beaumont/Port Arthur or Houston/Galveston/Brazoria area. <i>If the response to Question III.C.2 is "Yes" and the refinery is in the Beaumont/Port Arthur area, go to Section III.D.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.	The application area is complying with the provisions of 40 CFR Part 63, Subpart G, as an alternative to complying with this division (relating to Industrial Wastewater). <i>If the response to Question III.C.3 is "Yes," go to Section III.D.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.	The application area is located at a plant with an annual VOC loading in wastewater, as determined in accordance with 30 TAC § 115.148, less than or equal to 10 Mg (11.03 tons). <i>If the response to Question III.C.4 is "Yes," go to Section III.D.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
5.	The application area includes wastewater drains, junction boxes, lift stations, or weirs that are subject to the control requirements of 30 TAC § 115.142(1).	<input type="checkbox"/> Yes <input type="checkbox"/> No
6.	The application area includes wastewater drains, junction boxes, lift stations, or weirs that handle streams chosen for exemption under 30 TAC § 115.147(2).	<input type="checkbox"/> Yes <input type="checkbox"/> No
7.	The application area includes wastewater drains, junction boxes, lift stations, or weirs that have an executive director approved exemption under 30 TAC § 115.147(4).	<input type="checkbox"/> Yes <input type="checkbox"/> No
D. Loading and Unloading of VOCs		
◆ 1.	The application area includes VOC loading operations.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 2.	The application area includes VOC transport vessel unloading operations. <i>For GOP applications, if the responses to Questions III.D.1 - D.2 are "No," go to Section III.E.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No

# Application Area-Wide Applicability Determinations and General Information

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For SOP applications, answer ALL questions unless otherwise directed.

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<b>III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)</b>		
<b>D. Loading and Unloading of VOCs (continued)</b>		
◆ 3.	Transfer operations at motor vehicle fuel dispensing facilities are the only VOC transfer operations conducted in the application area.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>E. Filling of Gasoline Storage Vessels (Stage I) for Motor Vehicle Fuel Dispensing Facilities</b>		
◆ 1.	The application area includes one or more motor vehicle fuel dispensing facilities and gasoline is transferred from a tank-truck tank into a stationary storage container. <i>If the response to Question III.E.1 is "No," go to Section III.F.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 2.	Transfers to stationary storage containers used exclusively for the fueling of agricultural implements are the only transfer operations conducted at facilities in the application area.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 3.	All transfers at facilities in the application area are made into stationary storage containers with internal floating roofs, external floating roofs, or their equivalent. <i>If the response to Question III.E.2 and/or E.3 is "Yes," go to Section III.F.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 4.	The application area is located in a covered attainment county as defined in 30 TAC § 115.10. <i>If the response to Question III.E.4 is "No," go to Question III.E.9.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 5.	Stationary gasoline storage containers with a nominal capacity less than or equal to 1,000 gallons are located at the facility.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 6.	Stationary gasoline storage containers with a nominal capacity greater than 1,000 gallons are located at the facility.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 7.	At facilities located in a covered attainment county other than Bastrop, Bexar, Caldwell, Comal, Guadalupe, Hays, Travis, Williamson, or Wilson County, transfers are made to stationary storage tanks greater than 1000 gallons located at a facility which has dispensed less than 100,000 gallons of gasoline in a calendar month after October 31, 2014. <i>If the response to Question III.E.7 is "Yes," go to Section III.F.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No

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<b>III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)</b>		
<b>E. Filling of Gasoline Storage Vessels (Stage I) for Motor Vehicle Fuel Dispensing Facilities (continued)</b>		
◆ 8.	At facilities located in Bastrop, Bexar, Caldwell, Comal, Guadalupe, Hays, Travis, Williamson, or Wilson County, transfers are made to stationary storage tanks greater than 1000 gallons located at a facility which has dispensed no more than 25,000 gallons of gasoline in a calendar month after December 31, 2004. <i>If the response to Question III.E.8 is "Yes," go to Section III.F.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 9.	Transfers are made to stationary storage tanks located at a motor vehicle fuel dispensing facility which has dispensed no more than 10,000 gallons of gasoline in any calendar month after January 1, 1991 and for which construction began prior to November 15, 1992.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 10.	Transfers are made to stationary storage tanks located at a motor vehicle fuel dispensing facility which has dispensed more than 10,000 gallons of gasoline in any calendar month after January 1, 1991 and for which construction began prior to November 15, 1992.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 11.	Transfers are made to stationary storage tanks located at a motor vehicle fuel dispensing facility which commenced construction on or after November 15, 1992.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 12.	At facilities located in Ellis, Johnson, Kaufman, Parker, or Rockwall County, transfers are made to stationary storage tanks located at a facility which has dispensed at least 10,000 gallons of gasoline but less than 125,000 gallons of gasoline in a calendar month after April 30, 2005.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>F. Control of VOC Leaks from Transport Vessels (Complete this section for GOP applications for GOPs 511, 512, 513 and 514 only)</b>		
◆ 1.	Tank-truck tanks are filled with, or emptied of, gasoline at a facility that is subject to 30 TAC § 115.214(a)(1)(C) or 115.224(2) within the application area.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

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<b>III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds</b>		
<b>F. Control of VOC Leaks from Transport Vessels (Complete this section for GOP applications for GOPs 511, 512, 513 and 514 only) (continued)</b>		
◆ 2.	Tank-truck tanks are filled with non-gasoline VOCs having a TVP greater than or equal to 0.5 psia under actual storage conditions at a facility subject to 30 TAC § 115.214(a)(1)(C) within the application area.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
◆ 3.	Tank-truck tanks are filled with, or emptied of, gasoline at a facility that is subject to 30 TAC § 115.214(b)(1)(C) or 115.224(2) within the application area.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<b>G. Control of Vehicle Refueling Emissions (Stage II) at Motor Vehicle Fuel Dispensing Facilities</b>		
◆ 1.	The application area includes one or more motor vehicle fuel dispensing facilities and gasoline is transferred from a stationary storage container into motor vehicle fuel tanks. <i>If the response to Question III.G.1 is "No" or "N/A," go to Section III.H.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
◆ 2.	The application area includes facilities that began construction on or after November 15, 1992 and prior to May 16, 2012.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 3.	The application area includes facilities that began construction prior to November 15, 1992. <i>If the responses to Questions III.G.2 and III.G.3 are both "No," go to Section III.H.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 4.	The application area includes only facilities that have a monthly throughput of less than 10,000 gallons of gasoline.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 5.	The decommissioning of all Stage II vapor recovery control equipment located in the application area has been completed and the decommissioning notice submitted.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

# Application Area-Wide Applicability Determinations and General Information

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<b>III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)</b>		
<b>H. Control of Reid Vapor Pressure (RVP) of Gasoline</b>		
◆ 1.	The application area includes stationary tanks, reservoirs, or other containers holding gasoline that may ultimately be used in a motor vehicle in El Paso County. <i>If the response to Question III.H.1 is "No" or "N/A," go to Section III.I.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
◆ 2.	The application area includes stationary tanks, reservoirs, or other containers holding gasoline that will be used exclusively for the fueling of agricultural implements.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 3.	The application area includes a motor vehicle fuel dispensing facility.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 4.	The application area includes stationary tanks, reservoirs, or other containers holding gasoline and having a nominal capacity of 500 gallons or less.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>I. Process Unit Turnaround and Vacuum-Producing Systems in Petroleum Refineries</b>		
1.	The application area is located at a petroleum refinery.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>J. Surface Coating Processes (Complete this section for GOP applications only.)</b>		
◆ 1.	Surface coating operations (other than those performed on equipment located on-site and in-place) that meet the exemption specified in 30 TAC § 115.427(3)(A) or 115.427(7) are performed in the application area.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

# Application Area-Wide Applicability Determinations and General Information

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For SOP applications, answer ALL questions unless otherwise directed.

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III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)		
K. Cutback Asphalt		
1.	Conventional cutback asphalt containing VOC solvents for the paving of roadways, driveways, or parking lots, is used or specified for use in the application area by a state, municipal, or county agency. <i>If the response to Question III.K.1 is "N/A," go to Section III.L.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
2.	The use, application, sale, or offering for sale of conventional cutback asphalt containing VOC solvents for the paving of roadways, driveways, or parking lots occurs in the application area.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
3.	Asphalt emulsion is used or produced within the application area.	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.	The application area is using an alternate control requirement as specified in 30 TAC § 115.513. <i>If the response to Question III.K.4 is "No," go to Section III.L.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
5.	The application area uses, applies, sells, or offers for sale asphalt concrete, made with cutback asphalt, that meets the exemption specified in 30 TAC § 115.517(1).	<input type="checkbox"/> Yes <input type="checkbox"/> No
6.	The application area uses, applies, sells, or offers for sale cutback asphalt that is used solely as a penetrating prime coat.	<input type="checkbox"/> Yes <input type="checkbox"/> No
7.	The applicant using cutback asphalt is a state, municipal, or county agency.	<input type="checkbox"/> Yes <input type="checkbox"/> No
L. Degassing of Storage Tanks, Transport Vessels and Marine Vessels		
◆ 1.	The application area includes degassing operations for stationary, marine, and/or transport vessels. <i>If the response to Question III.L.1 is "No" or "N/A," go to Section III.M.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
◆ 2.	Degassing of only ocean-going, self-propelled VOC marine vessels is performed in the application area. <i>If the response to Question III.L.2 is "Yes," go to Section III.M.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

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

III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds		
L. Degassing of Storage Tanks, Transport Vessels and Marine Vessels (continued)		
◆ 3.	Degassing of stationary VOC storage vessels with a nominal storage capacity of 1,000,000 gallons or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
◆ 4.	Degassing of stationary VOC storage vessels with a nominal storage capacity of 250,000 gallons or more, or a nominal storage capacity of 75,000 gallons and storing materials with a true vapor pressure greater than 2.6 psia, and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
◆ 5.	Degassing of VOC transport vessels with a nominal storage capacity of 8,000 gallons or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 6.	Degassing of VOC marine vessels with a nominal storage capacity of 10,000 barrels (420,000 gallons) or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
◆ 7.	Degassing of VOC marine vessels with a nominal storage capacity of 10,000 barrels (420,000 gallons) and a vapor space partial pressure $\geq$ 0.5 psia that have sustained damage as specified in 30 TAC § 115.547(5) is performed in the application area.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
M. Petroleum Dry Cleaning Systems		
1.	The application area contains one or more petroleum dry cleaning facilities that use petroleum-based solvents.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A



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III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)		
N. Vent Gas Control (Highly Reactive Volatile Organic Compounds (HRVOC))		
1.	The application area includes one or more vent gas streams containing HRVOC.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
2.	The application area includes one or more flares that emit or have the potential to emit HRVOC. <i>If the responses to Questions III.N.1 and III.N.2 are both "No" or "N/A," go to Section III.O. If the response to Question III.N.1 is "Yes," continue with Question III.N.3.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
3.	All vent streams in the application area that are routed to a flare contain less than 5.0% HRVOC by weight at all times.	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.	All vent streams in the application area that are not routed to a flare contain less than 100 ppmv HRVOC at all times. <i>If the responses to Questions III.N.3 and III.N.4 are both "Yes," go to Section III.O.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
5.	The application area contains pressure relief valves that are not controlled by a flare.	<input type="checkbox"/> Yes <input type="checkbox"/> No
6.	The application area has at least one vent stream which has no potential to emit HRVOC.	<input type="checkbox"/> Yes <input type="checkbox"/> No
7.	The application area has vent streams from a source described in 30 TAC § 115.727(c)(3)(A) - (H).	<input type="checkbox"/> Yes <input type="checkbox"/> No
O. Cooling Tower Heat Exchange Systems (HRVOC)		
1.	The application area includes one or more cooling tower heat exchange systems that emit or have the potential to emit HRVOC.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

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

IV. Title 30 TAC Chapter 117 - Control of Air Pollution from Nitrogen Compounds		
A. Applicability		
◆ 1.	<p>The application area is located in the Houston/Galveston/Brazoria, Beaumont/Port Arthur, or Dallas/Fort Worth Eight-Hour area.</p> <p><i>For SOP applications, if the response to Question IV.A.1 is "Yes," complete Sections IV.B - IV.F and IV.H.</i></p> <p><i>For GOP applications for GOPs 511, 512, 513, or 514, if the response to Question IV.A.1 is "Yes," go to Section IV.F.</i></p> <p><i>For GOP applications for GOP 517, if the response to Question IV.A.1 is "Yes," complete Sections IV.C and IV.F.</i></p> <p><i>For GOP applications, if the response to Question IV.A.1 is "No," go to Section VI.</i></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.	<p>The application area is located in Bexar, Comal, Ellis, Hays, or McLennan County and includes a cement kiln.</p> <p><i>If the response to Question IV.A.2 is "Yes," go to Question IV.H.1.</i></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
3.	<p>The application area includes a utility electric generator in an east or central Texas county.</p> <p><i>See instructions for a list of counties included.</i></p> <p><i>If the response to Question IV.A.3 is "Yes," go to Question IV.G.1.</i></p> <p><i>If the responses to Questions IV.A.1 - 3 are all "No," go to Question IV.H.1.</i></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B. Utility Electric Generation in Ozone Nonattainment Areas		
1.	<p>The application area includes units specified in 30 TAC §§ 117.1000, 117.1200, or 117.1300.</p> <p><i>If the response to Question IV.B.1 is "No," go to Question IV.C.1.</i></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.	<p>The application area is complying with a System Cap in 30 TAC §§ 117.1020 or 117.1220.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No

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<b>IV. Title 30 TAC Chapter 117 - Control of Air Pollution from Nitrogen Compounds (continued)</b>		
<b>C. Commercial, Institutional, and Industrial Sources in Ozone Nonattainment Areas</b>		
◆ 1.	The application area is located at a site subject to 30 TAC Chapter 117, Subchapter B and includes units specified in 30 TAC §§ 117.100, 117.300, or 117.400. <i>For SOP applications, if the response to Question IV.C.1 is "No," go to Question IV.D.1. For GOP applications for GOP 517, if the response to Question IV.C.1 is "No," go to Section IV.F.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 2.	The application area is located at a site that was a major source of NO <sub>x</sub> before November 15, 1992.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
◆ 3.	The application area includes an electric generating facility required to comply with the System Cap in 30 TAC § 117.320.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>D. Adipic Acid Manufacturing</b>		
1.	The application area is located at, or part of, an adipic acid production unit.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<b>E. Nitric Acid Manufacturing - Ozone Nonattainment Areas</b>		
1.	The application area is located at, or part of, a nitric acid production unit.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<b>F. Combustion Control at Minor Sources in Ozone Nonattainment Areas - Boilers, Process Heaters, Stationary Engines and Gas Turbines</b>		
◆ 1.	The application area is located at a site that is a minor source of NO <sub>x</sub> in the Houston/Galveston/Brazoria or Dallas/Fort Worth Eight-Hour areas (except for Wise County). <i>For SOP applications, if the response to Question IV.F.1 is "No," go to Question IV.G.1. For GOP applications, if the response to Question IV.F.1 is "No," go to Section VI.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 2.	The application area is located in the Houston/Galveston/Brazoria area and has units that qualify for an exemption under 30 TAC § 117.2003(a).	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 3.	The application area is located in the Houston/Galveston/Brazoria area and has units that qualify for an exemption under 30 TAC § 117.2003(b).	<input type="checkbox"/> Yes <input type="checkbox"/> No

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<b>IV. Title 30 TAC Chapter 117 - Control of Air Pollution from Nitrogen Compounds (continued)</b>		
<b>F. Combustion Control at Minor Sources in Ozone Nonattainment Areas - Boilers, Process Heaters, Stationary Engines and Gas Turbines (continued)</b>		
◆ 4.	The application area is located in the Dallas/Fort Worth Eight-Hour area (except for Wise County) and has units that qualify for an exemption under 30 TAC § 117.2103.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 5.	The application area has units subject to the emission specifications under 30 TAC §§ 117.2010 or 30 TAC § 117.2110.	<input type="checkbox"/> Yes <input type="checkbox"/> No
6.	The application area has a unit that has been approved for alternative case specific specifications (ACSS) in 30 TAC § 117.2025 or 30 TAC § 117.2125. <i>If the response to Question IV.F.6 is "No," go to Section IV.G.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
7.	An ACSS for carbon monoxide (CO) has been approved?	<input type="checkbox"/> Yes <input type="checkbox"/> No
8.	An ACSS for ammonia (NH <sub>3</sub> ) has been approved?	<input type="checkbox"/> Yes <input type="checkbox"/> No
9.	Provide the Permit Number(s) and authorization/issuance date(s) of the NSR project(s) that incorporates an ACSS below.	
<b>G. Utility Electric Generation in East and Central Texas</b>		
1.	The application area includes utility electric power boilers and/or stationary gas turbines (including duct burners used in turbine exhaust ducts) that were placed into service before December 31, 1995. <i>If the response to Question IV.G.1 is "No," go to Question IV.H.1.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.	The application area is complying with the System Cap in 30 TAC § 117.3020.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>H. Multi-Region Combustion Control - Water Heaters, Small Boilers, and Process Heaters</b>		
1.	The application area includes a manufacturer, distributor, retailer or installer of natural gas fired water heaters, boilers or process heaters with a maximum rated capacity of 2.0 MMBtu/hr or less. <i>If the response to question IV.H.1 is "No," go to Section V.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.	All water heaters, boilers or process heaters manufactured, distributed, retailed or installed qualify for an exemption under 30 TAC § 117.3203.	<input type="checkbox"/> Yes <input type="checkbox"/> No

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<b>V. Title 40 Code of Federal Regulations Part 59 (40 CFR Part 59) - National Volatile Organic Compound Emission Standards for Consumer and Commercial Products</b>	
<b>A. Subpart B - National Volatile Organic Compound Emission Standards for Automobile Refinish Coatings</b>	
1. The application area manufactures automobile refinishing coatings or coating components and sells or distributes these coatings or coating components in the United States.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2. The application area imports automobile refinishing coatings or coating components, manufactured on or after January 11, 1999, and sells or distributes these coatings or coating components in the United States. <i>If the responses to Questions V.A.1 and V.A.2 are both "No," go to Section V.B.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
3. All automobile refinishing coatings or coating components manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR § 59.100(c)(1) - (6).	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>B. Subpart C - National Volatile Organic Compound Emission Standards for Consumer Products</b>	
1. The application area manufactures consumer products for sale or distribution in the United States.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2. The application area imports consumer products manufactured on or after December 10, 1998 and sells or distributes these consumer products in the United States.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
3. The application area is a distributor of consumer products whose name appears on the label of one or more of the products. <i>If the responses to Questions V.B.1 - V.B.3 are all "No," go to Section V.C.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
4. All consumer products manufactured, imported, or distributed by the application area meet one or more of the exemptions specified in 40 CFR § 59.201(c)(1) - (7).	<input type="checkbox"/> Yes <input type="checkbox"/> No

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<b>V. Title 40 Code of Federal Regulations Part 59 (40 CFR Part 59) - National Volatile Organic Compound Emission Standards for Consumer and Commercial Products (continued)</b>		
<b>C. Subpart D - National Volatile Organic Compound Emission Standards for Architectural Coatings</b>		
1.	The application area manufactures or imports architectural coatings for sale or distribution in the United States.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.	The application area manufactures or imports architectural coatings that are registered under the Federal Insecticide, Fungicide, and Rodenticide Act. <i>If the responses to Questions V.C.1-2 are both "No," go to Section V.D.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
3.	All architectural coatings manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR §59.400(c)(1)-(5).	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>D. Subpart E - National Volatile Organic Compound Emission Standards for Aerosol Coatings</b>		
1.	The application area manufactures or imports aerosol coating products for sale or distribution in the United States.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.	The application area is a distributor of aerosol coatings for resale or distribution in the United States.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>E. Subpart F - Control of Evaporative Emissions from New and In-Use Portable Fuel Containers</b>		
1.	The application area manufactures or imports portable fuel containers for sale or distribution in the United States. <i>If the response to Question V.E.1 is "No," go to Section VI.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.	All portable fuel containers manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR § 59.605(a) - (c).	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards</b>		
<b>A. Applicability</b>		
◆ 1.	The application area includes a unit(s) that is subject to one or more 40 CFR Part 60 subparts. <i>If the response to Question VI.A.1 is "No," go to Section VII.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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<b>VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)</b>		
<b>B. Subpart Y - Standards of Performance for Coal Preparation and Processing Plants</b>		
1.	The application area is located at a coal preparation and processing plant. <i>If the response to Question VI.B.1 is "No," go to Section VI.C.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.	The coal preparation and processing plant has a design capacity greater than 200 tons per day (tpd). <i>If the response to Question VI.B.2 is "No," go to Section VI.C.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.	The plant has an option to enforceably limit its operating level to less than 200 tpd and is choosing this option. <i>If the response to Question VI.B.3 is "Yes," go to Section VI.C.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.	The plant contains an open storage pile, as defined in § 60.251, as an affected facility. <i>If the response to Question VI.B.4 is "No," go to Section VI.C.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
5.	The open storage pile was constructed, reconstructed or modified after May 27, 2009.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>C. Subpart GG - Standards of Performance for Stationary Gas Turbines (GOP applicants only)</b>		
◆ 1.	The application area includes one or more stationary gas turbines that have a heat input at peak load greater than or equal to 10 MMBtu/hr (10.7GJ/hr), based on the lower heating value of the fuel fired. <i>If the response to Question VI.C.1 is "No" or "N/A," go to Section VI.E.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
◆ 2.	One or more of the affected facilities were constructed, modified, or reconstructed after October 3, 1977 and prior to February 19, 2005. <i>If the response to Question VI.C.2 is "No," go to Section VI.E.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 3.	One or more stationary gas turbines in the application area are using a previously approved alternative fuel monitoring schedule as specified in 40 CFR § 60.334(h)(4).	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 4.	The exemption specified in 40 CFR § 60.332(e) is being utilized for one or more stationary gas turbines in the application area.	<input type="checkbox"/> Yes <input type="checkbox"/> No



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<b>VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)</b>		
<b>C. Subpart GG - Standards of Performance for Stationary Gas Turbines (GOP applicants only) (continued)</b>		
◆ 5.	One or more stationary gas turbines subject to 40 CFR Part 60, Subpart GG in the application area is injected with water or steam for the control of nitrogen oxides.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>D. Subpart XX - Standards of Performance for Bulk Gasoline Terminals</b>		
1.	The application area includes bulk gasoline terminal loading racks. <i>If the response to Question VI.D.1 is "No," go to Section VI.E.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
2.	One or more of the loading racks were constructed or modified after December 17, 1980, and are not subject to 40 CFR Part 63, Subpart CC.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>E. Subpart LLL - Standards of Performance for Onshore Natural Gas Processing: Sulfur Dioxide (SO<sub>2</sub>) Emissions</b>		
◆ 1.	The application area includes affected facilities identified in 40 CFR § 60.640(a) that process natural gas (onshore). <i>For SOP applications, if the response to Question VI.E.1 is "No," go to Section VI.F. For GOP applications, if the response to Question VI.E.1 is or "N/A," go to Section VI.H.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 2.	The affected facilities commenced construction or modification after January 20, 1984 and on or before August 23, 2011. <i>For SOP applications, if the response to Question VI.E.2 is "No," go to Section VI.F. For GOP applications, if the response to Question VI.E.2 is "No," go to Section VI.H.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 3.	The application area includes a gas sweetening unit with a design capacity greater than or equal to 2 long tons per day (LTPD) of hydrogen sulfide but operates at less than 2 LTPD. <i>For SOP applications, if the response to Question VI.E.3 is "No," go to Section VI.F. For GOP applications, if the response to Question VI.E.3 is "No," go to Section VI.H.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No



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<b>VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)</b>		
<b>E. Subpart LLL - Standards of Performance for Onshore Natural Gas Processing: Sulfur Dioxide (SO<sub>2</sub>) Emissions (continued)</b>		
◆ 4.	Federally enforceable operating limits have been established in the preconstruction authorization limiting the gas sweetening unit to less than 2 LTPD. <i>For SOP applications, if the response to Question VI.E.4. is "No," go to Section VI.F. For GOP applications, if the response to Question VI.E.4. is "No," go to Section VI.H.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 5.	Please provide the Unit ID(s) for the gas sweetening unit(s) that have established federally enforceable operating limits in the space provided below	
<b>F. Subpart OOO - Standards of Performance for Nonmetallic Mineral Processing Plants</b>		
1.	The application area includes affected facilities identified in 40 CFR § 60.670(a)(1) that are located at a fixed or portable nonmetallic mineral processing plant. <i>If the response to Question VI.F.1 is "No," go to Section VI.G.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.	Affected facilities identified in 40 CFR § 60.670(a)(1) and located in the application area are subject to 40 CFR Part 60, Subpart OOO.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>G. Subpart QQQ - Standards of Performance for VOC Emissions from Petroleum Refinery Wastewater Systems</b>		
1.	The application area is located at a petroleum refinery and includes one or more of the affected facilities identified in 40 CFR § 60.690(a)(2) - (4) for which construction, modification, or reconstruction was commenced after May 4, 1987. <i>If the response to Question VI.G.1 is "No," go to Section VI.H.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.	The application area includes storm water sewer systems.	<input type="checkbox"/> Yes <input type="checkbox"/> No

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<b>VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards</b>		
<b>G. Subpart QQQ - Standards of Performance for VOC Emissions from Petroleum Refinery Wastewater Systems (continued)</b>		
3.	The application area includes ancillary equipment which is physically separate from the wastewater system and does not come in contact with or store oily wastewater.	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.	The application area includes non-contact cooling water systems.	<input type="checkbox"/> Yes <input type="checkbox"/> No
5.	The application area includes individual drain systems. <i>If the response to Question VI.G.5 is "No," go to Section VI.H.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
6.	The application area includes one or more individual drain systems that meet the exemption specified in 40 CFR § 60.692-2(d).	<input type="checkbox"/> Yes <input type="checkbox"/> No
7.	The application area includes completely closed drain systems.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>H. Subpart AAAA - Standards of Performance for Small Municipal Waste Incineration Units for Which Construction Commenced After August 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 6, 2004</b>		
◆ 1.	The application area includes at least one small municipal waste incineration unit, other than an air curtain incinerator. <i>If the response to Question VI.H.1. is "N/A," go to Section VI.I. If the response to Question VI.H.1 is "No," go to Question VI.H.4.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
◆ 2.	The application area includes at least one small municipal waste incineration unit, other than an air curtain incinerator, constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 3.	The application area includes at least one small municipal waste incineration unit, other than an air curtain incinerator, constructed before August 30, 1999 and not modified or reconstructed on or after June 6, 2006.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 4.	The application area includes at least one air curtain incinerator. <i>If the response to Question VI.H.4 is "No," go to Section VI.I.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No

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

<b>VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)</b>		
<b>H. Subpart AAAA - Standards of Performance for Small Municipal Waste Incineration Units for Which Construction Commenced After August 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 6, 2004 (continued)</b>		
◆ 5.	The application area includes at least one air curtain incinerator constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006. <i>If the response to Question VI.H.5 is "No," go to Question VI.H.7.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 6.	All air curtain incinerators constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006 combust only yard waste.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 7.	The application area includes at least one air curtain incinerator constructed before August 30, 1999 and not modified or reconstructed on or after June 6, 2006.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 8.	All air curtain incinerators constructed before August 30, 1999 and not modified or reconstructed on or after June 6, 2006 combust only yard waste.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>I. Subpart CCCC - Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction Commenced After November 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 1, 2001</b>		
◆ 1.	The application area includes at least one commercial or industrial solid waste incineration unit, other than an air curtain incinerator. <i>If the response to Question VI.I.1 is "N/A," go to Section VI.J. If the response to Question VI.I.1 is "No," go to Question VI.I.4.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
◆ 2.	The application area includes at least one commercial or industrial solid waste incineration unit, other than an air curtain incinerator, constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001.	<input type="checkbox"/> Yes <input type="checkbox"/> No

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<b>VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)</b>		
<b>I. Subpart CCCC - Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction Commenced After November 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 1, 2001 (continued)</b>		
◆ 3.	The application area includes at least one commercial or industrial solid waste incineration unit, other than an air curtain incinerator, constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 4.	The application area includes at least one air curtain incinerator. <i>If the response to Question VI.I.4 is "No," go to Section VI.J.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 5.	The application area includes at least one air curtain incinerator, constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001. <i>If the response to Question VI.I.5 is "No," go to VI.I.7.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 6.	All air curtain incinerators constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 7.	The application area includes at least one air curtain incinerator, constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 8.	All air curtain incinerators constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	<input type="checkbox"/> Yes <input type="checkbox"/> No

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<b>VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)</b>		
<b>J. Subpart EEEE - Standards of Performance for Other Solid Waste Incineration Units for Which Construction Commenced After December 9, 2004 or for Which Modification or Reconstruction Commenced on or After June 16, 2006</b>		
◆ 1.	The application area includes at least one very small municipal waste incineration unit or institutional incineration unit, other than an air curtain incinerator. <i>If the response to Question VI.J.1 is "N/A," go to Section VI.K. If the response to Question VI.J.1 is "No," go to Question VI.J.4.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
◆ 2.	The application area includes at least one very small municipal waste incineration unit, other than an air curtain incinerator, constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 3.	The application area includes at least one very small municipal waste incineration unit, other than an air curtain incinerator, constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 4.	The application area includes at least one air curtain incinerator. <i>If the response to Question VI.J.4 is "No," go to Section VI.K.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 5.	The application area includes at least one air curtain incinerator constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006. <i>If the response to Question VI.J.5 is "No," go to Question VI.J.7.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 6.	All air curtain incinerators constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 7.	The application area includes at least one air curtain incinerator constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006.	<input type="checkbox"/> Yes <input type="checkbox"/> No

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<b>VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (NSPS) (continued)</b>		
<b>J. Subpart EEEE - Standards of Performance for Other Solid Waste Incineration Units for Which Construction Commenced After December 9, 2004 or for Which Modification or Reconstruction Commenced on or After June 16, 2006 (continued)</b>		
◆ 8.	All air curtain incinerators constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 9.	The air curtain incinerator is located at an institutional facility and is a distinct operating unit of the institutional facility that generated the waste.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 10.	The air curtain incinerator burns less than 35 tons per day of wood waste, clean lumber, or yard waste or a mixture of these materials.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>K. Subpart OOOO - Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution</b>		
◆ 1.	The application area includes one or more of the onshore affected facilities listed in 40 CFR § 60.5365(a)-(g) that are subject to 40 CFR Part 60, Subpart OOOO.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants</b>		
<b>A. Applicability</b>		
◆ 1.	The application area includes a unit(s) that is subject to one or more 40 CFR Part 61 subparts. <i>If the response to Question VII.A.1 is "No" or "N/A," go to Section VIII.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
<b>B. Subpart F - National Emission Standard for Vinyl Chloride</b>		
1.	The application area is located at a plant which produces ethylene dichloride by reaction of oxygen and hydrogen chloride with ethylene, vinyl chloride by any process, and/or one or more polymers containing any fraction of polymerized vinyl chloride.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>C. Subpart J - National Emission Standard for Benzene Emissions for Equipment Leaks (Fugitive Emission Sources) of Benzene (Complete this section for GOP applications only)</b>		
◆ 1.	The application area includes equipment in benzene service.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

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<b>VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)</b>	
<b>D. Subpart L - National Emission Standard for Benzene Emissions from Coke By-Product Recovery Plants</b>	
1. The application area is located at a coke by-product recovery plant and includes one or more of the affected sources identified in 40 CFR § 61.130(a) - (b). <i>If the response to Question VII.D.1 is "No," go to Section VII.E.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. The application area includes equipment in benzene service as determined by 40 CFR § 61.137(b).	<input type="checkbox"/> Yes <input type="checkbox"/> No
3. The application area has elected to comply with the provisions of 40 CFR § 61.243-1 and 40 CFR § 61.243-2.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>E. Subpart M - National Emission Standard for Asbestos</b>	
<i>Applicability</i>	
1. The application area includes sources, operations, or activities specified in 40 CFR §§ 61.143, 61.144, 61.146, 61.147, 61.148, or 61.155. <i>If the response to Question VII.E.1 is "No," go to Section VII.F.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<i>Roadway Construction</i>	
2. The application area includes roadways constructed or maintained with asbestos tailings or asbestos-containing waste material.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<i>Manufacturing Commercial Asbestos</i>	
3. The application area includes a manufacturing operation using commercial asbestos. <i>If the response to Question VII.E.3 is "No," go to Question VII.E.4.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
a. Visible emissions are discharged to outside air from the manufacturing operation	<input type="checkbox"/> Yes <input type="checkbox"/> No
b. An alternative emission control and waste treatment method is being used that has received prior U.S. Environmental Protection Agency (EPA) approval.	<input type="checkbox"/> Yes <input type="checkbox"/> No



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<b>VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)</b>	
<b>E. Subpart M - National Emission Standard for Asbestos (continued)</b>	
<i>Manufacturing Commercial Asbestos (continued)</i>	
c. Asbestos-containing waste material is processed into non-friable forms.	<input type="checkbox"/> Yes <input type="checkbox"/> No
d. Asbestos-containing waste material is adequately wetted.	<input type="checkbox"/> Yes <input type="checkbox"/> No
e. Alternative filtering equipment is being used that has received EPA approval.	<input type="checkbox"/> Yes <input type="checkbox"/> No
f. A high efficiency particulate air (HEPA) filter is being used that is certified to be at least 99.97% efficient for 0.3-micron particles	<input type="checkbox"/> Yes <input type="checkbox"/> No
g. The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<i>Asbestos Spray Application</i>	
4. The application area includes operations in which asbestos-containing materials are spray applied. <i>If the response to Question VII.E.4 is "No," go to Question VII.E.5.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
a. Asbestos fibers are encapsulated with a bituminous or resinous binder during spraying and are not friable after drying. <i>If the response to Question VII.E.4.a is "Yes," go to Question VII.E.5.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
b. Spray-on applications on buildings, structures, pipes, and conduits do not use material containing more than 1% asbestos.	<input type="checkbox"/> Yes <input type="checkbox"/> No
c. An alternative emission control and waste treatment method is being used that has received prior EPA approval.	<input type="checkbox"/> Yes <input type="checkbox"/> No



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<b>VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)</b>	
<b>E. Subpart M - National Emission Standard for Asbestos (continued)</b>	
<i>Asbestos Spray Application (continued)</i>	
d. Asbestos-containing waste material is processed into non-friable forms.	<input type="checkbox"/> Yes <input type="checkbox"/> No
e. Asbestos-containing waste material is adequately wetted.	<input type="checkbox"/> Yes <input type="checkbox"/> No
f. Alternative filtering equipment is being used that has received EPA approval.	<input type="checkbox"/> Yes <input type="checkbox"/> No
g. A HEPA filter is being used that is certified to be at least 99.97% efficient for 0.3-micron particles.	<input type="checkbox"/> Yes <input type="checkbox"/> No
h. The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<i>Fabricating Commercial Asbestos</i>	
5. The application area includes a fabricating operation using commercial asbestos. <i>If the response to Question VII.E.5 is "No," go to Question VII.E.6.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
a. Visible emissions are discharged to outside air from the manufacturing operation.	<input type="checkbox"/> Yes <input type="checkbox"/> No
b. An alternative emission control and waste treatment method is being used that has received prior EPA approval.	<input type="checkbox"/> Yes <input type="checkbox"/> No
c. Asbestos-containing waste material is processed into non-friable forms.	<input type="checkbox"/> Yes <input type="checkbox"/> No
d. Asbestos-containing waste material is adequately wetted.	<input type="checkbox"/> Yes <input type="checkbox"/> No
e. Alternative filtering equipment is being used that has received EPA approval.	<input type="checkbox"/> Yes <input type="checkbox"/> No

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<b>VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)</b>	
<b>E. Subpart M - National Emission Standard for Asbestos (continued)</b>	
<i>Fabricating Commercial Asbestos (continued)</i>	
f. A HEPA filter is being used that is certified to be at least 99.97% efficient for 0.3-micron particles.	<input type="checkbox"/> Yes <input type="checkbox"/> No
g. The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<i>Non-sprayed Asbestos Insulation</i>	
6. The application area includes insulating materials (other than spray applied insulating materials) that are either molded and friable or wet-applied and friable after drying.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<i>Asbestos Conversion</i>	
7. The application area includes operations that convert regulated asbestos-containing material and asbestos-containing waste material into nonasbestos (asbestos-free) material.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>F. Subpart P - National Emission Standard for Inorganic Arsenic Emissions from Arsenic Trioxide and Metallic Arsenic Production Facilities</b>	
1. The application area is located at a metallic arsenic production plant or at an arsenic trioxide plant that processes low-grade arsenic bearing materials by a roasting condensation process.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>G. Subpart BB - National Emission Standard for Benzene Emissions from Benzene Transfer Operations</b>	
1. The application area is located at a benzene production facility and/or bulk terminal. <i>If the response to Question VII.G.1 is "No," go to Section VII.H.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. The application area includes benzene transfer operations at marine vessel loading racks.	<input type="checkbox"/> Yes <input type="checkbox"/> No

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<b>VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for</b>	
<b>G. Subpart BB - National Emission Standard for Benzene Emissions from Benzene Transfer Operations (continued)</b>	
3. The application area includes benzene transfer operations at railcar loading racks.	<input type="checkbox"/> Yes <input type="checkbox"/> No
4. The application area includes benzene transfer operations at tank-truck loading racks.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>H. Subpart FF - National Emission Standard for Benzene Waste Operations</b>	
<b>Applicability</b>	
1. The application area includes a chemical manufacturing plant, coke by-product recovery plant, or petroleum refinery facility as defined in § 61.341.	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. The application area is located at a hazardous waste treatment, storage, and disposal (TSD) facility site as described in 40 CFR § 61.340(b). <i>If the responses to Questions VII.H.1 and VII.H.2 are both "No," go to Section VIII.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
3. The application area is located at a site that has no benzene onsite in wastes, products, byproducts, or intermediates. <i>If the response to Question VII.H.3 is "Yes," go to Section VIII.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
4. The application area is located at a site having a total annual benzene quantity from facility waste less than 1 megagram per year (Mg/yr). <i>If the response to Question VII.H.4 is "Yes," go to Section VIII</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
5. The application area is located at a site having a total annual benzene quantity from facility waste greater than or equal to 1 Mg/yr but less than 10 Mg/yr. <i>If the response to Question VII.H.5 is "Yes," go to Section VIII.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No

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<b>VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)</b>	
<b>H. Subpart FF - National Emission Standard for Benzene Waste Operations (continued)</b>	
<i>Applicability (continued)</i>	
6. The flow-weighted annual average benzene concentration of each waste stream at the site is based on documentation.	<input type="checkbox"/> Yes <input type="checkbox"/> No
7. The application area has waste streams with flow-weighted annual average water content of 10% or greater.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<i>Waste Stream Exemptions</i>	
8. The application area has waste streams that meet the exemption specified in 40 CFR § 61.342(c)(2) (the flow-weighted annual average benzene concentration is less than 10 ppmw).	<input type="checkbox"/> Yes <input type="checkbox"/> No
9. The application area has waste streams that meet the exemption specified in 40 CFR § 61.342(c)(3) because process wastewater has a flow rate less than 0.02 liters per minute or an annual wastewater quantity less than 10 Mg/yr.	<input type="checkbox"/> Yes <input type="checkbox"/> No
10. The application area has waste streams that meet the exemption specified in 40 CFR § 61.342(c)(3) because the total annual benzene quantity is less than or equal to 2 Mg/yr.	<input type="checkbox"/> Yes <input type="checkbox"/> No
11. The application area transfers waste off-site for treatment by another facility.	<input type="checkbox"/> Yes <input type="checkbox"/> No
12. The application area is complying with 40 CFR § 61.342(d).	<input type="checkbox"/> Yes <input type="checkbox"/> No
13. The application area is complying with 40 CFR § 61.342(e). <i>If the response to Question VII.H.13 is "No," go to Question VII.H.15.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
14. The application area has facility waste with a flow weighted annual average water content of less than 10%.	<input type="checkbox"/> Yes <input type="checkbox"/> No

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<b>VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)</b>	
<b>H. Subpart FF - National Emission Standard for Benzene Waste Operations (continued)</b>	
<i>Container Requirements</i>	
15. The application area has containers, as defined in 40 CFR § 61.341, that receive non-exempt benzene waste. <i>If the response to Question VII.H.15 is "No," go to Question VII.H.18.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
16. The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers. <i>If the response to Question VII.H.16 is "Yes," go to Question VII.H.18.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
17. Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<i>Individual Drain Systems</i>	
18. The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage non-exempt benzene waste. <i>If the response to Question VII.H.18 is "No," go to Question VII.H.25.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
19. The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. <i>If the response to Question VII.H.19 is "Yes," go to Question VII.H.25.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
20. The application area has individual drain systems complying with 40 CFR § 61.346(a). <i>If the response to Question VII.H.20 is "No," go to Question VII.H.22.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
21. Covers and closed-vent systems used for individual drain systems operate such that the individual drain system is maintained at a pressure less than atmospheric pressure.	<input type="checkbox"/> Yes <input type="checkbox"/> No

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<b>VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)</b>	
<b>H. Subpart FF - National Emission Standard for Benzene Waste Operations (continued)</b>	
<i>Individual Drain Systems (continued)</i>	
22. The application area has individual drain systems complying with 40 CFR § 61.346(b). <i>If the response to Question VII.H.22 is "No," go to Question VII.H.25.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
23. Junction boxes in the individual drain systems are equipped with a system to prevent the flow of organic vapors from the junction box vent pipe to the atmosphere during normal operation.	<input type="checkbox"/> Yes <input type="checkbox"/> No
24. Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<i>Remediation Activities</i>	
25. Remediation activities take place at the application area subject to 40 CFR Part 61, Subpart FF.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories</b>	
<b>A. Applicability</b>	
◆ 1. The application area includes a unit(s) that is subject to one or more 40 CFR Part 63 subparts other than subparts made applicable by reference under subparts in 40 CFR Part 60, 61 or 63. <i>See instructions for 40 CFR Part 63 subparts made applicable only by reference.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>B. Subpart F - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry</b>	
1. The application area is located at a plant site that is a major source as defined in the Federal Clean Air Act § 112(a). <i>If the response to Question VIII.B.1 is "No," go to Section VIII.D.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
B. Subpart F - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry (continued)	
2. The application area is located at a site that includes at least one chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii). <i>If the response to Question VIII.B.2 is "No," go to Section VIII.D.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
3. The application area is located at a site that includes at least one chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii) and uses as a reactant or manufactures as a product, or co-product, one or more of the organic hazardous air pollutants listed in table 2 of 40 CFR Part 63, Subpart F.	<input type="checkbox"/> Yes <input type="checkbox"/> No
4. The application area includes a chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii) and uses as a reactant or manufactures as a product, or co-product, one or more of the organic hazardous air pollutants listed in table 2 of 40 CFR Part 63, Subpart F.	<input type="checkbox"/> Yes <input type="checkbox"/> No
5. The application area includes a chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii) and does <u>not</u> use as a reactant or manufacture as a product, or co-product, one or more of the organic hazardous air pollutants listed in table 2 of 40 CFR Part 63, Subpart F. <i>If the response to Questions VIII.B.3, B.4 and B.5 are all "No," go to Section VIII.D.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No

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

VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater		
<i>Applicability</i>		
1.	The application area is located at a site that is subject to 40 CFR 63, Subpart F and the application area includes process vents, storage vessels, transfer racks, or waste streams associated with a chemical manufacturing process subject to 40 CFR 63, Subpart F. <i>If the response to Question VIII.C.1 is "No," go to Section VIII.D.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.	The application area includes fixed roofs, covers, and/or enclosures that are required to comply with 40 CFR § 63.148.	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.	The application area includes vapor collection systems or closed-vent systems that are required to comply with 40 CFR § 63.148. <i>If the response to Question VIII.C.3 is "No," go to Question VIII.C.8.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.	The application area includes vapor collection systems or closed-vent systems that are constructed of hard piping.	<input type="checkbox"/> Yes <input type="checkbox"/> No
5.	The application area includes vapor collection systems or closed-vent systems that contain bypass lines that could divert a vent stream away from a control device and to the atmosphere. <i>If the response to Question VIII.C.5 is "No," go to Question VIII.C.8.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<i>Vapor Collection and Closed Vent Systems</i>		
6.	Flow indicators are installed, calibrated, maintained, and operated at the entrances to bypass lines in the application area.	<input type="checkbox"/> Yes <input type="checkbox"/> No
7.	Bypass lines in the application area are secured in the closed position with a car-seal or a lock-and-key type configuration.	<input type="checkbox"/> Yes <input type="checkbox"/> No



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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>		
<b>C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)</b>		
<i>Reloading or Cleaning of Railcars, Tank Trucks, or Barges</i>		
8.	The application area includes reloading and/or cleaning of railcars, tank trucks, or barges that deliver HAPs to a storage tank. <i>If the response to Question VIII.C.8 is "No," go to Question VIII.C.11.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
9.	The application area includes operations that are complying with § 63.119(g)(6) through the use of a closed-vent system with a control device used to reduce inlet emissions of HAPs by at least 95 percent by weight or greater.	<input type="checkbox"/> Yes <input type="checkbox"/> No
10.	The application area includes operations that are complying with § 63.119(g)(6) through the use of a vapor balancing system.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<i>Transfer Racks</i>		
11.	The application area includes Group 1 transfer racks that load organic HAPs.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<i>Process Wastewater Streams</i>		
12.	The application area includes process wastewater streams. <i>If the response to Question VIII.C.12 is "No," go to Question VIII.C.34.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
13.	The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Part 61, Subpart FF. <i>If the response to Question VIII.C.13 is "No," go to Question VIII.C.15.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
14.	The application area includes process wastewater streams that are complying with 40 CFR §§ 63.110(e)(1)(i) and (e)(1)(ii).	<input type="checkbox"/> Yes <input type="checkbox"/> No
15.	The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Part 61, Subpart F. <i>If the response to Question VIII.C.15 is "No," go to Question VIII.C.17.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)	
Process Wastewater Streams (continued)	
16. The application area includes process wastewater streams utilizing the compliance option specified in 40 CFR § 63.110(f)(4)(ii).	<input type="checkbox"/> Yes <input type="checkbox"/> No
17. The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Parts 260 through 272. <i>If the response to Question VIII.C.17 is "No," go to Question VIII.C.20.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
18. The application area includes process wastewater streams complying with 40 CFR § 63.110(e)(2)(i).	<input type="checkbox"/> Yes <input type="checkbox"/> No
19. The application are includes process wastewater streams complying with 40 CFR § 63.110(e)(2)(ii).	<input type="checkbox"/> Yes <input type="checkbox"/> No
20. The application area includes process wastewater streams, located at existing sources, that are designated as Group 1; are required to be treated as Group 1 under 40 CFR § 63.110; or are determined to be Group 1 for Table 9 compounds.	<input type="checkbox"/> Yes <input type="checkbox"/> No
21. The application area includes process wastewater streams, located at existing sources that are Group 2.	<input type="checkbox"/> Yes <input type="checkbox"/> No
22. The application area includes process wastewater streams, located at new sources, that are designated as Group 1; required to be treated as Group 1 under 40 CFR § 63.110; or are determined to be Group 1 for Table 8 or Table 9 compounds.	<input type="checkbox"/> Yes <input type="checkbox"/> No
23. The application area includes process wastewater streams, located at new sources that are Group 2 for both Table 8 and Table 9 compounds.	<input type="checkbox"/> Yes <input type="checkbox"/> No

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)</b>	
<b>Process Wastewater Streams (continued)</b>	
24. All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.C.24 is "Yes," go to Question VIII.C.34.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
25. The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.C.25 is "No," go to Question VIII.C.27.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
26. The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	<input type="checkbox"/> Yes <input type="checkbox"/> No
27. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	<input type="checkbox"/> Yes <input type="checkbox"/> No
28. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.C.27 - VIII.C.28 are both "No," go to Question VIII.C.30.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
29. The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	<input type="checkbox"/> Yes <input type="checkbox"/> No
30. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	<input type="checkbox"/> Yes <input type="checkbox"/> No

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)</b>	
<b><i>Drains</i></b>	
31. The application area includes individual drain systems that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream. <i>If the response to Question VIII.C.31 is "No," go to Question VIII.C.34.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
32. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	<input type="checkbox"/> Yes <input type="checkbox"/> No
33. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	<input type="checkbox"/> Yes <input type="checkbox"/> No
34. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of a chemical manufacturing process unit that meets the criteria of 40 CFR § 63.100(b). <i>If the response to Question VIII.C.34 is "No," go to Question VIII.C.39.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
35. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes (that are part of a chemical manufacturing process unit) that meet the criteria listed in 40 CFR § 63.149(d). <i>If the response to Question VIII.C.35 is "No," go to Question VIII.C.39.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
36. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds listed in 40 CFR Part 63 Subpart G, Table 9, at any flow rate.	<input type="checkbox"/> Yes <input type="checkbox"/> No

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>C. Subpart G-National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operation, and Wastewater (continued)</b>	
<b>Drains (continued)</b>	
37. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds listed in 40 CFR Part 63 Subpart G, Table 9, at an annual average flow rate greater than or equal to 10 liters per minute.	<input type="checkbox"/> Yes <input type="checkbox"/> No
38. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of a chemical manufacturing process unit that is subject to the new source requirements of 40 CFR § 63.100(l)(1) or (l)(2); and the equipment conveys water with a total annual average concentration greater than or equal to 10 parts per million by weight of compounds listed in 40 CFR Part 63 Subpart G, Table 8, at an average annual flow rate greater than or equal to 0.02 liter per minute.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Gas Streams</b>	
39. The application area includes gas streams meeting the characteristics of 40 CFR § 63.107(b) - (h) or the criteria of 40 CFR § 63.113(i) and are transferred to a control device not owned or operated by the applicant.	<input type="checkbox"/> Yes <input type="checkbox"/> No
40. The applicant is unable to comply with 40 CFR §§ 63.113 - 63.118 for one or more reasons described in 40 CFR § 63.100(q)(1), (3), or (5).	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>D. Subpart N - National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks</b>	
1. The application area includes chromium electroplating or chromium anodizing tanks located at hard chromium electroplating, decorative chromium electroplating, and/or chromium anodizing operations.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
E. Subpart O - Ethylene Oxide Emissions Standards for Sterilization Facilities		
1.	The application area includes sterilization facilities where ethylene oxide is used in the sterilization or fumigation of materials. <i>If the response to Question VIII.E.1 is "No," go to Section VIII.F.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.	Sterilization facilities located in the application area are subject to 40 CFR Part 63, Subpart O. <i>If the response to Question VIII.E.2 is "No," go to Section VIII.F.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.	The sterilization source has used less than 1 ton (907 kg) of ethylene oxide within all consecutive 12-month periods after December 6, 1996.	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.	The sterilization source has used less than 10 tons (9070 kg) of ethylene oxide within all consecutive 12-month periods after December 6, 1996.	<input type="checkbox"/> Yes <input type="checkbox"/> No
F. Subpart Q - National Emission Standards for Industrial Process Cooling Towers		
1.	The application area includes industrial process cooling towers. <i>If the response to Question VIII.F.1 is "No," go to Section VIII.G.</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2.	Chromium-based water treatment chemicals have been used on or after September 8, 1994.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
G. Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)		
1.	The application area includes a bulk gasoline terminal.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.	The application area includes a pipeline breakout station. <i>If the responses to Questions VIII.G.1 and VIII.G.2 are both "No," go to Section VIII.H.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
3.	The bulk gasoline terminal or pipeline breakout station is located within a contiguous area and under common control with another bulk gasoline terminal or a pipeline breakout station. <i>If the response to Question VIII.G.3 is "Yes," go to Question VIII.G.10.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
G. Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) (continued)		
4.	The bulk gasoline terminal or pipeline breakout station is located within a contiguous area and under common control with sources, other than bulk gasoline terminals or pipeline breakout stations that emit or have the potential to emit HAPs. <i>If the response to Question VIII.G.4 is "Yes," go to Question VIII.G.10.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
5.	An emissions screening factor was calculated for the bulk gasoline terminal or pipeline breakout station. <i>If the response to Question VIII.G.5 is "No," go to Question VIII.G.10.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
6.	The value 0.04(OE) is less than 5% of the value of the bulk gasoline terminal emissions screening factor (ET) or the pipeline breakout station emissions screening factor (Ep). <i>If the response to Question VIII.G.6 is "No," go to Question VIII.G.10.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
7.	Emissions screening factor less than 0.5 (ET or EP < 0.5). <i>If the response to Question VIII.G.7 is "Yes," go to Section VIII.H.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
8.	Emissions screening factor greater than or equal to 0.5, but less than 1.0 (0.5 ≤ ET or EP < 1.0). <i>If the response to Question VIII.G.8 is "Yes," go to Section VIII.H.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
9.	Emissions screening factor greater than or equal to 1.0 (ET or EP ≥ 1.0). <i>If the response to Question VIII.G.9 is "Yes," go to Question VIII.G.11.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
10.	The site at which the application area is located is a major source of HAP. <i>If the response to Question VIII.G.10 is "No," go to Section VIII.H.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
11.	The application area is using an alternative leak monitoring program as described in 40 CFR § 63.424(f).	<input type="checkbox"/> Yes <input type="checkbox"/> No



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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
H. Subpart S - National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry		
1.	The application area includes processes that produce pulp, paper, or paperboard and are located at a plant site that is a major source of HAPs as defined in 40 CFR § 63.2. <i>If the response to Question VIII.H.1 is "No," go to Section VIII.I.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.	The application area uses processes and materials specified in 40 CFR § 63.440(a)(1) - (3). <i>If the response to Question VIII.H.2 is "No," go to Section VIII.I.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.	The application area includes one or more sources subject to 40 CFR Part 63, Subpart S that are existing sources. <i>If the response to Question VIII.H.3 is "No," go to Section VIII.I.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.	The application area includes one or more kraft pulping systems that are existing sources.	<input type="checkbox"/> Yes <input type="checkbox"/> No
5.	The application area includes one or more dissolving-grade bleaching systems that are existing sources at a kraft or sulfite pulping mill.	<input type="checkbox"/> Yes <input type="checkbox"/> No
6.	The application area includes bleaching systems that are existing sources and are complying with the Voluntary Advanced Technology Incentives Program for Effluent Limitation Guidelines in 40 CFR § 430.24. <i>If the response to Question VIII.H.6 is "No," go to Section VIII.I.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
7.	The application area includes bleaching systems that are complying with 40 CFR § 63.440(d)(3)(i).	<input type="checkbox"/> Yes <input type="checkbox"/> No
8.	The application area includes bleaching systems that are complying with 40 CFR § 63.440(d)(3)(ii).	<input type="checkbox"/> Yes <input type="checkbox"/> No



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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
I. Subpart T - National Emission Standards for Halogenated Solvent Cleaning		
1.	The application area includes an individual batch vapor, in-line vapor, in-line cold, and/or batch cold solvent cleaning machine that uses a hazardous air pollutant (HAP) solvent, or any combination of halogenated HAP solvents, in a total concentration greater than 5% by weight, as a cleaning and/or drying agent.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.	The application area is located at a major source and includes solvent cleaning machines, qualifying as affected facilities, that use perchloroethylene, trichloroethylene or methylene chloride.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
3.	The application area is located at an area source and includes solvent cleaning machines, other than cold batch cleaning machines, that use perchloroethylene, trichloroethylene or methylene chloride.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins		
1.	The application area includes elastomer product process units and/or wastewater streams and wastewater operations that are associated with elastomer product process units. <i>If the response to Question VIII.J.1 is "No," go to Section VIII.K.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.	Elastomer product process units and/or wastewater streams and wastewater operations located in the application area are subject to 40 CFR Part 63, Subpart U. <i>If the response to Question VIII.J.2 is "No," go to Section VIII.K.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.	The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 for organic HAPs as defined in 40 CFR § 63.482.	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.	The application area includes process wastewater streams that are Group 2 for organic HAPs as defined in 40 CFR § 63.482.	<input type="checkbox"/> Yes <input type="checkbox"/> No

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins (continued)		
5.	All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.J.5 is "Yes," go to Question VIII.J.15.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
6.	The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.J.6 is "No," go to Question VIII.J.8.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
7.	The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	<input type="checkbox"/> Yes <input type="checkbox"/> No
8.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	<input type="checkbox"/> Yes <input type="checkbox"/> No
9.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.J.8 - VIII.J.9 are both "No," go to Question VIII.J.11.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
10.	The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	<input type="checkbox"/> Yes <input type="checkbox"/> No

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins (continued)</b>	
<i>Containers</i>	
11. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<i>Drains</i>	
12. The application area includes individual drain systems that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream. <i>If the response to Question VIII.J.12 is "No," go to Question VIII.J.15.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
13. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	<input type="checkbox"/> Yes <input type="checkbox"/> No
14. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
15. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of an elastomer product process unit. <i>If the response to Question VIII.J.15 is "No," go to Section VIII.K.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
16. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that meet the criteria listed in 40 CFR § 63.149(d) and § 63.501(a)(12). <i>If the response to Question VIII.J.16 is "No," go to Section VIII.K.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No

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For SOP applications, answer ALL questions unless otherwise directed.

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

<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins (continued)</b>	
<b><i>Drains (continued)</i></b>	
17. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.482, at any flow rate.	<input type="checkbox"/> Yes <input type="checkbox"/> No
18. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.482, at an annual average flow rate greater than or equal to 10 liters per minute.	<input type="checkbox"/> Yes <input type="checkbox"/> No
19. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of an elastomer product process unit that is a new affected source or part of a new affected source and the equipment conveys water with a total annual average concentration greater than or equal to 10 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.482, at an average annual flow rate greater than or equal to 0.02 liter per minute.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>K. Subpart W - National Emission Standards for Hazardous Air Pollutants for Epoxy Resins Production and Non-nylon Polyamides Production</b>	
1. The manufacture of basic liquid epoxy resins (BLR) and/or manufacture of wet strength resins (WSR) is conducted in the application area. <i>If the response to Question VIII.K.1 is "No" or "N/A," go to Section VIII.L.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
2. The application area includes a BLR and/or WSR research and development facility.	<input type="checkbox"/> Yes <input type="checkbox"/> No

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>L. Subpart X - National Emission Standards for Hazardous Air Pollutants from Secondary Lead Smelting</b>	
1. The application area includes one or more of the affected sources in 40 CFR § 63.541(a) that are located at a secondary lead smelter. <i>If the response to Question VIII.L.1 is "No" or "N/A," go to Section VIII.M.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
2. The application area is using and approved alternate to the requirements of § 63.545(c)(1)-(5) for control of fugitive dust emission sources.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>M. Subpart Y - National Emission Standards for Marine Tank Vessel Loading Operations</b>	
1. The application area includes marine tank vessel loading operations that are specified in 40 CFR § 63.560 and located at an affected source as defined in 40 CFR § 63.561.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>N. Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries</b>	
<b>Applicability</b>	
1. The application area includes petroleum refining process units and/or related emission points that are specified in 40 CFR § 63.640(c)(1) - (c)(7). <i>If the response to Question VIII.N.1 is "No," go to Section VIII.O.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2. All petroleum refining process units/and or related emission points within the application area are specified in 40 CFR § 63.640(g)(1) - (g)(7). <i>If the response to Question VIII.N.2 is "Yes," go to Section VIII.O.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>N. Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries (continued)</b>	
<i>Applicability (continued)</i>	
3. The application area is located at a plant site that is a major source as defined in the Federal Clean Air Act § 112(a). <i>If the response to Question VIII.N.3 is "No," go to Section VIII.O.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
4. The application area is located at a plant site which emits or has equipment containing/contacting one or more of the HAPs listed in table 1 of 40 CFR Part 63, Subpart CC. <i>If the response to Question VIII.N.4 is "No," go to Section VIII.O.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
5. The application area includes Group 1 wastewater streams that are not conveyed, stored, or treated in a wastewater stream management unit that also receives streams subject to the provisions of 40 CFR §§ 63.133 - 63.147 of Subpart G wastewater provisions section.	<input type="checkbox"/> Yes <input type="checkbox"/> No
6. The application area includes Group 2 wastewater streams that are not conveyed, stored, or treated in a wastewater stream management unit that also receives streams subject to the provisions of 40 CFR §§ 63.133 - 63.147 of Subpart G wastewater provisions section.	<input type="checkbox"/> Yes <input type="checkbox"/> No
7. The application area includes Group 1 or Group 2 wastewater streams that are conveyed, stored, or treated in a wastewater stream management unit that also receives streams subject to the provisions of 40 CFR §§ 63.133 - 63.147 of Subpart G wastewater provisions section. <i>If the response to Question VIII.N.7 is "No," go to Question VIII.N.13.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
8. The application area includes Group 1 or Group 2 wastewater streams that are complying with 40 CFR § 63.640(o)(2)(i).	<input type="checkbox"/> Yes <input type="checkbox"/> No

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for</b>	
<b>N. Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries (continued)</b>	
<i>Applicability (continued)</i>	
9. The application area includes Group 1 or Group 2 wastewater streams that are complying with 40 CFR § 63.640(o)(2)(ii). <i>If the response to Question VIII.N.9 is "No," go to Question VIII.N.13.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
10. The application area includes Group 2 wastewater streams or organic streams whose benzene emissions are subject to control through the use of one or more treatment processes or waste management units under the provisions of 40 CFR Part 61, Subpart FF on or after December 31, 1992.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Containers, Drains, and other Appurtenances</b>	
11. The application area includes containers that are subject to the requirements of 40 CFR § 63.135 as a result of complying with 40 CFR § 63.640(o)(2)(ii).	<input type="checkbox"/> Yes <input type="checkbox"/> No
12. The application area includes individual drain systems that are subject to the requirements of 40 CFR § 63.136 as a result of complying with 40 CFR § 63.640(o)(2)(ii).	<input type="checkbox"/> Yes <input type="checkbox"/> No
13. The application area includes Group 1 gasoline loading racks as specified in § 63.650(a).	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>O. Subpart DD - National Emission Standards for Off-site Waste and Recovery Operations</b>	
1. The application area receives material that meets the criteria for off-site material as specified in 40 CFR § 63.680(b)(1). <i>If the response to Question VIII.O.1 is "No" or "N/A," go to Section VIII.P</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
2. Materials specified in 40 CFR § 63.680(b)(2) are received at the application area.	<input type="checkbox"/> Yes <input type="checkbox"/> No
3. The application area has a waste management operation receiving off-site material and is regulated under 40 CFR Part 264 or Part 265.	<input type="checkbox"/> Yes <input type="checkbox"/> No

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
O. Subpart DD - National Emission Standards for Off-site Waste and Recovery Operations (continued)		
4.	The application area has a waste management operation treating wastewater which is an off-site material and is exempted under 40 CFR § 264.1(g)(6) or § 265.1(c)(10).	<input type="checkbox"/> Yes <input type="checkbox"/> No
5.	The application area has an operation subject to Clean Water Act, § 402 or § 307(b) but is not owned by a “state” or “municipality.”	<input type="checkbox"/> Yes <input type="checkbox"/> No
6.	The predominant activity in the application area is the treatment of wastewater received from off-site.	<input type="checkbox"/> Yes <input type="checkbox"/> No
7.	The application area has a recovery operation that recycles or reprocesses hazardous waste which is an off-site material and is exempted under 40 CFR § 264.1(g)(2) or § 265.1(c)(6).	<input type="checkbox"/> Yes <input type="checkbox"/> No
8.	The application area has a recovery operation that recycles or reprocesses used solvent which is an off-site material and is not part of a chemical, petroleum, or other manufacturing process that is required to use air emission controls by another subpart of 40 CFR Part 63 or Part 61.	<input type="checkbox"/> YES <input type="checkbox"/> No
9.	The application area has a recovery operation that re-refines or reprocesses used oil which is an off-site material and is regulated under 40 CFR Part 279, Subpart F (Standards for Used Oil Processors and Refiners).	<input type="checkbox"/> Yes <input type="checkbox"/> No
10.	The application area is located at a site where the total annual quantity of HAPs in the off-site material is less than 1 megagram per year. <i>If the response to Question VIII.O.10 is “Yes,” go to Section VIII.P.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No



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

VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for	
O. Subpart DD - National Emission Standards for Off-site Waste and Recovery Operations (continued)	
11. The application area receives offsite materials with average VOHAP concentration less than 500 ppmw at the point of delivery that are not combined with materials having a VOHAP concentration of 500 ppmw or greater. <i>If the response to Question VIII.O.11 is "No," go to Question VIII.O.14.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
12. VOHAP concentration is determined by direct measurement.	<input type="checkbox"/> Yes <input type="checkbox"/> No
13. VOHAP concentration is based on knowledge of the off-site material.	<input type="checkbox"/> Yes <input type="checkbox"/> No
14. The application area includes an equipment component that is a pump, compressor, and agitator, pressure relief device, sampling connection system, open-ended valve or line, valve, connector or instrumentation system. <i>If the response to Question VIII.O.14 is "No," go to Question VIII.O.17.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
15. An equipment component in the application area contains or contacts off-site material with a HAP concentration greater than or equal to 10% by weight.	<input type="checkbox"/> Yes <input type="checkbox"/> No
16. An equipment component in the application area is intended to operate 300 hours or more during a 12-month period.	<input type="checkbox"/> Yes <input type="checkbox"/> No
17. The application area includes containers that manage non-exempt off-site material.	<input type="checkbox"/> Yes <input type="checkbox"/> No
18. The application area includes individual drain systems that manage non-exempt off-site materials.	<input type="checkbox"/> Yes <input type="checkbox"/> No

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

<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for</b>		
<b>P. Subpart GG - National Emission Standards for Aerospace Manufacturing and Rework Facilities</b>		
1.	The application area includes facilities that manufacture or rework commercial, civil, or military aerospace vehicles or components. <i>If the response to Question VIII.P.1 is "No" or "N/A," go to Section VIII.Q.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
2.	The application area includes one or more of the affected sources specified in 40 CFR § 63.741(c)(1) - (7).	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Q. Subpart HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities.</b>		
◆ 1.	The application area contains facilities that process, upgrade or store hydrocarbon liquids that are located at oil and natural gas production facilities prior to the point of custody transfer.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆ 2.	The application area contains facilities that process, upgrade or store natural gas prior to the point at which natural gas enters the natural gas transmission and storage source category or is delivered to a final end user. <i>For SOP applications, if the responses to Questions VIII.Q.1 and VIII.Q.2 are both "No," go to Section VIII.R.</i> <i>For GOP applications, if the responses to Questions VIII.Q.1 and VIII.Q.2 are both "No," go to Section VIII.Z.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆ 3.	The application area contains only facilities that exclusively process, store or transfer black oil as defined in § 63.761. <i>For SOP applications, if the response to Question VIII.Q.3 is "Yes," go to Section VIII.R.</i> <i>For GOP applications, if the response to Question VIII.Q.3 is "Yes," go to Section VIII.Z.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 4.	The application area is located at a site that is a major source of HAP. <i>If the response to Question VIII.Q.4 is "No," go to Question VIII.Q.6.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No

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

VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
Q. Subpart - HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities (continued)		
◆ 5.	<p>The application area contains only a facility, prior to the point of custody transfer, with facility-wide actual annual average natural gas throughput less than 18.4 thousand standard cubic meters (649,789.9 ft<sup>3</sup>) per day and a facility-wide actual annual average hydrocarbon liquid throughput less than 39,700 liters (10,487.6 gallons) per day.</p> <p><i>For SOP applications, if the response to Question VIII.Q.5 is "Yes," go to Section VIII.R.</i></p> <p><i>For GOP applications, if the response to Question VIII.Q.5 is "Yes," go to Section VIII.Z.</i></p> <p><i>For all applications, if the response to Question VIII.Q.5 is "No," go to Question VIII.Q.9.</i></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 6.	<p>The application area includes a triethylene glycol (TEG) dehydration unit.</p> <p><i>For SOP applications, if the answer to Question VIII.Q.6 is "No," go to Section VIII.R. For GOP applications, if the response to Question VIII.Q.6 is "No," go to Section VIII.Z.</i></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 7.	<p>The application area is located at a site that is within the boundaries of UA plus offset or a UC, as defined in 40 CFR § 63.761.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 8.	<p>The site has actual emissions of 5 tons per year or more of a single HAP, or 12.5 tons per year or more of a combination of HAP.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 9.	<p>Emissions for major source determination are being estimated based on the maximum natural gas or hydrocarbon liquid throughput as calculated in § 63.760(a)(1)(i)-(iii).</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No

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

<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>R. Subpart II - National Emission Standards for Shipbuilding and Ship Repair (Surface Coating)</b>	
1. The application area includes shipbuilding or ship repair operations. <i>If the response to Question VIII.R.1 is "No," go to Section VIII.S.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2. Shipbuilding or ship repair operations located in the application area are subject to 40 CFR Part 63, Subpart II.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>S. Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations</b>	
1. The application area includes wood furniture manufacturing operations and/or wood furniture component manufacturing operations. <i>If the response to Question VIII.S.1 is "No" or "N/A," go to Section VIII.T.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
2. The application area meets the definition of an "incidental wood manufacturer" as defined in 40 CFR § 63.801.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>T. Subpart KK - National Emission Standards for the Printing and Publishing Industry</b>	
1. The application area includes publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
<b>U. Subpart PP - National Emission Standards for Containers</b>	
1. The application area includes containers for which another 40 CFR Part 60, 61, or 63 subpart references the use of 40 CFR Part 63, Subpart PP for the control of air emissions. <i>If the response to Question VIII.U.1 is "No," go to Section VIII.V.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2. The application area includes containers using Container Level 1 controls.	<input type="checkbox"/> Yes <input type="checkbox"/> No
3. The application area includes containers using Container Level 2 controls.	<input type="checkbox"/> Yes <input type="checkbox"/> No

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>		
<b>U. Subpart PP - National Emission Standards for Containers (continued)</b>		
4.	The application area includes containers using Container Level 3 controls.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>V. Subpart RR - National Emission Standards for Individual Drain Systems</b>		
1.	The application area includes individual drain systems for which another 40 CFR Part 60, 61, or 63 subpart references the use of 40 CFR Part 63, Subpart RR for the control of air emissions.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards</b>		
1.	The application area includes an acetal resins production process unit; an acrylic and modacrylic fiber production process unit complying with 40 CFR § 63.1103(b)(3)(i); or an existing polycarbonate production process.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.	The application area includes process wastewater streams generated from an acetal resins production process unit; an acrylic and modacrylic fiber production process unit complying with 40 CFR § 63.1103(b)(3)(i); or an existing polycarbonate production process. <i>If the responses to Questions VIII.W.1 and VIII.W.2 are both "No," go to Question VIII.W.20.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
3.	The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 under the requirements of 40 CFR § 63.132(c).	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.	The application area includes process wastewater streams that are determined to be Group 2 under the requirements of 40 CFR § 63.132(c).	<input type="checkbox"/> Yes <input type="checkbox"/> No
5.	All Group 1 wastewater streams at the site are determined to have a total source mass flow rate of less than 1 MG/yr.	<input type="checkbox"/> Yes <input type="checkbox"/> No
6.	The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.W.6 is "No," go to Question VIII.W.8.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)		
7.	The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	<input type="checkbox"/> Yes <input type="checkbox"/> No
8.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	<input type="checkbox"/> Yes <input type="checkbox"/> No
9.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.W.8 and W.9 are both "No," go to Question VIII.W.11.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
10.	The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	<input type="checkbox"/> Yes <input type="checkbox"/> No
11.	The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	<input type="checkbox"/> Yes <input type="checkbox"/> No
12.	The application area includes individual drain systems that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. <i>If the response to Question VIII.W.12 is "No," go to Question VIII.W.15.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
13.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of covers and, if vented, closed vent systems and control devices.	<input type="checkbox"/> Yes <input type="checkbox"/> No
14.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	<input type="checkbox"/> Yes <input type="checkbox"/> No

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)	
15. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of an acetal resins production process unit; an acrylic and modacrylic fiber production process unit complying with 40 CFR § 63.1103(b)(3)(i); or an existing polycarbonate production process unit. <i>If the response to Question VIII.W.15 is "No," go to Question VIII.W.20.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
16. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that meet the criteria listed in 40 CFR § 63.1106(c)(1) - (3). <i>If the response to Question VIII.W.16 is "No," go to Question VIII.W.20.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
17. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds meeting the definition of organic HAP in Table 9 to 40 CFR Part 60, Subpart G, at any flow rate.	<input type="checkbox"/> Yes <input type="checkbox"/> No
18. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds meeting the definition of organic HAP in Table 9 to 40 CFR Part 60, Subpart G, at an annual average flow rate greater than or equal to 10 liters per minute.	<input type="checkbox"/> Yes <input type="checkbox"/> No



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

VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)	
19. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of an acrylic resins or acrylic and modacrylic fiber production process unit that is part of a new affected source or is a new affected source and the equipment conveys water with a total annual average concentration greater than or equal to 10 ppmw of compounds meeting the definition of organic HAP in Table 9 to 40 CFR Part 60, Subpart G, at an average annual flow rate greater than or equal to 0.02 liter per minute.	<input type="checkbox"/> Yes <input type="checkbox"/> No
20. The application area includes an ethylene production process unit.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
21. The application area includes waste streams generated from an ethylene production process unit. <i>If the responses to Questions VIII.W.20 and VIII.W.21 are both "No" or "N/A," go to Question VIII.W.54.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
22. The waste stream(s) contains at least one of the chemicals listed in 40 CFR § 63.1103(e), Table 7(g)(1). <i>If the response to Question VIII.W.22 is "No," go to Question VIII.W.54.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
23. Waste stream(s) are transferred off-site for treatment. <i>If the response to Question VIII.W.23 is "No," go to Question VIII.W.25.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
24. The application area has waste management units that treat or manage waste stream(s) prior to transfer off-site for treatment. <i>If the response to Question VIII.W.24 is "No," go to Question VIII.W.54.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No



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

VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)		
25.	The total annual benzene quantity from waste at the site is less than 10 Mg/yr as determined according to 40 CFR § 61.342(a).	<input type="checkbox"/> Yes <input type="checkbox"/> No
26.	The application area contains at least one waste stream that is a continuous butadiene waste stream as defined in 40 CFR § 63.1082(b). <i>If the response to Question VIII.W.26 is "No," go to Question VIII.W.43.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
27.	The waste stream(s) contains at least 10 ppmw 1, 3-butadiene at a flow rate of 0.02 liters per minute or is designated for control. <i>If the response to Question VIII.W.27 is "No," go to Question VIII.W.43.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
28.	The control requirements of 40 CFR Part 63, Subpart G for process wastewater as specified in 40 CFR § 63.1095(a)(2) are selected for control of the waste stream(s). <i>If the response to Question VIII.W.28 is "No," go to Question VIII.W.33.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
29.	The application area includes containers that receive, manage, or treat a continuous butadiene waste stream.	<input type="checkbox"/> Yes <input type="checkbox"/> No
30.	The application area includes individual drain systems that receive, manage, or treat a continuous butadiene waste stream. <i>If the response to Question VIII.W.30 is "No," go to Question VIII.W.43.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
31.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	<input type="checkbox"/> Yes <input type="checkbox"/> No

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)	
32. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs. <i>If the response to Question VIII.W.32 is required, go to Question VIII.W.43.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
33. The application area has containers, as defined in 40 CFR § 61.341, that receive a continuous butadiene waste stream. <i>If the response to Question VIII.W.33 is "No," go to Question VIII.W.36.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
34. The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers. <i>If the response to Question VIII.W.34 is "Yes," go to Question VIII.W.36.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
35. Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	<input type="checkbox"/> Yes <input type="checkbox"/> No
36. The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage a continuous butadiene waste stream. <i>If the response to Question VIII.W.36 is "No," go to Question VIII.W.43.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
37. The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. <i>If the response to Question VIII.W.37 is "Yes," go to Question VIII.W.43.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)		
38.	The application area has individual drain systems complying with 40 CFR § 61.346(a). <i>If the response to Question VIII.W.38 is "No," go to Question VIII.W.40.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
39.	Covers and closed-vent systems used for individual drain systems operate such that the individual drain system is maintained at a pressure less than atmospheric pressure.	<input type="checkbox"/> Yes <input type="checkbox"/> No
40.	The application area has individual drain systems complying with 40 CFR § 61.346(b). <i>If the response to Question VIII.W.40 is "No," go to Question VIII.W.43.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
41.	Junction boxes in the individual drain systems are equipped with a system to prevent the flow of organic vapors from the junction box vent pipe to the atmosphere during normal operation.	<input type="checkbox"/> Yes <input type="checkbox"/> No
42.	Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device.	<input type="checkbox"/> Yes <input type="checkbox"/> No
43.	The application area has at least one waste stream that contains benzene. <i>If the response to Question VIII.W.43 is "No," go to Question VIII.W.54.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
44.	The application area has containers, as defined in 40 CFR § 61.341, that receive a waste stream containing benzene. <i>If the response to Question VIII.W.44 is "No," go to Question VIII.W.47.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
45.	The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers. <i>If the response to Question VIII.W.45 is "Yes," go to Question VIII.W.47.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)		
46.	Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	<input type="checkbox"/> Yes <input type="checkbox"/> No
47.	The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage a waste stream containing benzene. <i>If the response to Question VIII.W.47 is "No," go to Question VIII.W.54.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
48.	The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. <i>If the response to Question VIII.W.48 is "Yes," go to Question VIII.W.54.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
49.	The application area has individual drain systems complying with 40 CFR § 61.346(a). <i>If the response to Question VIII.W.49 is "No," go to Question VIII.W.51.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
50.	Covers and closed-vent systems used for individual drain systems operate such that the individual drain system is maintained at a pressure less than atmospheric pressure.	<input type="checkbox"/> Yes <input type="checkbox"/> No
51.	The application area has individual drain systems complying with 40 CFR § 61.346(b). <i>If the response to Question VIII.W.51 is "No," go to Question VIII.W.54.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
52.	Junction boxes in the individual drain systems are equipped with a system to prevent the flow of organic vapors from the junction box vent pipe to the atmosphere during normal operation.	<input type="checkbox"/> Yes <input type="checkbox"/> No

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)	
53. Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device.	<input type="checkbox"/> Yes <input type="checkbox"/> No
54. The application area contains a cyanide chemicals manufacturing process. <i>If the response to Question VIII.W.54 is "No," go to Section VIII.X.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
55. The cyanide chemicals manufacturing process generates maintenance wastewater containing hydrogen cyanide or acetonitrile.	<input type="checkbox"/> Yes <input type="checkbox"/> No
X. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins	
1. The application area includes thermoplastic product process units, and/or their associated affected sources specified in 40 CFR § 63.1310(a)(1) - (5), that are subject to 40 CFR Part 63, Subpart JJJ. <i>If the response to Question VIII.X.1 is "No," go to Section VIII.Y.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2. The application area includes thermoplastic product process units and/or wastewater streams and wastewater operations that are associated with thermoplastic product process units. <i>If the response to Question VIII.X.2 is "No," go to Section VIII.Y.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
3. All process wastewater streams generated or managed in the application area are from sources producing polystyrene. <i>If the response to Question VIII.X.3 is "Yes," go to Section VIII.Y.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
4. All process wastewater streams generated or managed in the application area are from sources producing ASA/AMSAN. <i>If the response to Question VIII.X.4 is "Yes," go to Section VIII.Y.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
X. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins (continued)		
5.	The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 for organic HAPs as defined in 40 CFR § 63.1312.	<input type="checkbox"/> Yes <input type="checkbox"/> No
6.	The application area includes process wastewater streams, located at existing sources, that are Group 2 for organic HAPs as defined in 40 CFR § 63.1312.	<input type="checkbox"/> Yes <input type="checkbox"/> No
7.	The application area includes process wastewater streams, located at new sources, that are Group 2 for organic HAPs as defined in 40 CFR § 63.1312.	<input type="checkbox"/> Yes <input type="checkbox"/> No
8.	All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.X.8 is "Yes," go to Question VIII.X.18.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
9.	The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.X.9 is "No," go to Question VIII.X.11.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
10.	The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	<input type="checkbox"/> Yes <input type="checkbox"/> No
11.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	<input type="checkbox"/> Yes <input type="checkbox"/> No
12.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.X.11 - VIII.X.12 are both "No," go to Question VIII.X.14.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>X. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins (continued)</b>	
13. The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Containers</b>	
14. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Drains</b>	
15. The application area includes individual drain systems that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. <i>If the response to Question VIII.X.15 is "No," go to Question VIII.X.18.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
16. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	<input type="checkbox"/> Yes <input type="checkbox"/> No
17. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	<input type="checkbox"/> Yes <input type="checkbox"/> No
18. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of a thermoplastic product process unit. <i>If the response to Question VIII.X.18 is "No," go to Section VIII.Y.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No

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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>X. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins (continued)</b>	
<b><i>Drains (continued)</i></b>	
19. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that meet the criteria listed in 40 CFR § 63.149(d) and § 63.1330(b)(12). <i>If the response to Question VIII.X.19 is "No," go to Section VIII.Y.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
20. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.1312, at any flow rate.	<input type="checkbox"/> Yes <input type="checkbox"/> No
21. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.1312, at an annual average flow rate greater than or equal to 10 liters per minute.	<input type="checkbox"/> Yes <input type="checkbox"/> No
22. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of an thermoplastic product process unit that is a new affected source or part of a new affected source and the equipment conveys water with a total annual average concentration greater than or equal to 10 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.1312, at an average annual flow rate greater than or equal to 0.02 liter per minute	<input type="checkbox"/> Yes <input type="checkbox"/> No



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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>		
<b>Y. Subpart UUU - National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units.</b>		
1.	The application area is subject to 40 CFR Part 63, Subpart UUU - National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Z. Subpart AAAA - National Emission Standards for Hazardous Air Pollutants for Municipal Solid Waste (MSW) Landfills.</b>		
◆ 1.	The application area is subject to 40 CFR Part 63, Subpart AAAA - National Emission Standards for Hazardous Air Pollutants for Municipal Solid Waste Landfills.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON)</b>		
1.	The application area is located at a site that includes process units that manufacture as a primary product one or more of the chemicals listed in 40 CFR § 63.2435(b)(1).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.	The application area is located at a plant site that is a major source as defined in FCAA § 112(a).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
3.	The application area is located at a site that includes miscellaneous chemical manufacturing process units (MCPU) that process, use or generate one or more of the organic hazardous air pollutants listed in § 112(b) of the Clean Air Act or hydrogen halide and halogen HAP. <i>If the response to Question VIII.AA.1, AA.2 or AA.3 is "No," go to Section VIII.BB.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
4.	The application area includes process vents, storage vessels, transfer racks, or waste streams associated with a miscellaneous chemical manufacturing process subject to 40 CFR 63, Subpart FFFF. <i>If the response to Question VIII.AA.4 is "No," go to Section VIII.BB.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for		
AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)		
5.	The application area includes process wastewater streams. <i>If the response to Question VIII.AA.5 is "No," go to Question VIII.AA.24.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
6.	The application area includes process wastewater streams, located at existing sources, that are designated as Group 1 or are determined to be Group 1 for compounds listed in Table 8 of 40 CFR Part 63, Subpart G or Table 8 and Table 9 of 40 CFR Part 63, Subpart FFFF, as appropriate.	<input type="checkbox"/> Yes <input type="checkbox"/> No
7.	The application area includes process wastewater streams, located at existing sources, that are Group 2 for compounds listed in Table 8 or Table 8 and Table 9 of 40 CFR Part 63, Subpart FFFF, as appropriate.	<input type="checkbox"/> Yes <input type="checkbox"/> No
8.	The application area includes process wastewater streams, located at new sources, that are designated as Group 1 or are determined to be Group 1 for compounds listed in Table 8 of 40 CFR Part 63, Subpart G or Table 8 and Table 9 of 40 CFR Part 63, Subpart FFFF, as appropriate.	<input type="checkbox"/> Yes <input type="checkbox"/> No
9.	The application area includes process wastewater streams, located at new sources, that are Group 2 for compounds listed in Table 8 or Table 8 and Table 9 of 40 CFR Part 63, Subpart FFFF, as appropriate.	<input type="checkbox"/> Yes <input type="checkbox"/> No
10.	All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.AA.10 is "Yes," go to Question VIII.AA.24.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
11.	The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.AA.11 is "No," go to Question VIII.AA.13.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
12.	The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	<input type="checkbox"/> Yes <input type="checkbox"/> No
13.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	<input type="checkbox"/> Yes <input type="checkbox"/> No

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)		
14.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the responses to Questions VIII.AA.13 and VIII.AA.14 are both "No," go to Question VIII.AA.20.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
15.	Group 1 wastewater streams are transferred to an offsite treatment facility meeting the requirements of 40 CFR § 63.138(h). <i>If the response to Question VIII.AA.15 is "No," go to Question VIII.AA.17.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
16.	The option to document in the notification of compliance status report that the wastewater will be treated in a facility meeting the requirements of 40 CFR § 63.138(h) is elected.	<input type="checkbox"/> Yes <input type="checkbox"/> No
17.	Group 1 wastewater streams or residuals with a total annual average concentration of compounds in Table 8 of 40 CFR Part 63, Subpart FFFF less than 50 ppmw are transferred offsite. <i>If the response to Question VIII.AA.17 is "No," go to Question VIII.AA.19.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
18.	The transferor is demonstrating that less than 5 percent of the HAP in Table 9 of 40 CFR Part 63, Subpart FFFF is emitted from waste management units up to the activated sludge unit.	<input type="checkbox"/> Yes <input type="checkbox"/> No
19.	The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	<input type="checkbox"/> Yes <input type="checkbox"/> No
20.	The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	<input type="checkbox"/> Yes <input type="checkbox"/> No
21.	The application area includes individual drain systems that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream. <i>If the response to Question VIII.AA.21 is "No," go to Question VIII.AA.24.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
22.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	<input type="checkbox"/> Yes <input type="checkbox"/> No

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)	
AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)	
23. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	<input type="checkbox"/> Yes <input type="checkbox"/> No
24. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of a chemical manufacturing process unit that meets the criteria of 40 CFR § 63.100(b). <i>If the response to Question VIII.AA.24 is "No," go to Section VIII.BB.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
25. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes (that are part of a miscellaneous chemical manufacturing process unit) that meet the criteria listed in 40 CFR § 63.149(d). <i>If the response to Question VIII.AA.25 is "No," go to Section VIII.BB.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
26. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration of compounds in table 8 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 10,000 ppmw at any flow rate, and the total annual load of compounds in table 8 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 200 lb/yr.	<input type="checkbox"/> Yes <input type="checkbox"/> No
27. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration of compounds in table 8 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 1,000 ppmw, and the annual average flow rate is greater than or equal to 1 liter per minute.	<input type="checkbox"/> Yes <input type="checkbox"/> No
28. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of a chemical manufacturing process unit that is subject to the new source requirements of 40 CFR § 63.2445(a); and the equipment conveys water with a combined total annual average concentration of compounds in tables 8 and 9 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 30,000 ppmw, and the combined total annual load of compounds in tables 8 and 9 to this subpart is greater than or equal to 1 tpy.	<input type="checkbox"/> Yes <input type="checkbox"/> No

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For SOP applications, answer ALL questions unless otherwise directed.

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

<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>	
<b>BB. Subpart GGGG - National Emission Standards for Hazardous Air Pollutants for: Solvent Extractions for Vegetable Oil Production.</b>	
1. The application area includes a vegetable oil production process that: is by itself a major source of HAP emissions or, is collocated within a plant site with other sources that are individually or collectively a major source of HAP emissions.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>CC. Subpart GGGGG - National Emission Standards for Hazardous Air Pollutants: Site Remediation</b>	
1. The application area includes a facility at which a site remediation is conducted. <i>If the answer to Question VIII.CC.1 is "No," go to Section VIII.DD.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2. The application area is located at a site that is a major source of HAP. <i>If the answer to Question VIII.CC.2 is "No," go to Section VIII.DD.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
3. All site remediations qualify for one of the exemptions contained in 40 CFR § 63.7881(b)(1) through (6). <i>If the answer to Question VIII.CC.3 is "Yes," go to Section VIII.DD.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
4. All site remediation activities are complete, and the Administrator has been notified in writing. <i>If the answer to Question VIII.CC.4 is "Yes," go to Section VIII.DD.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
5. Prior to beginning site remediation activities, it was determined that the total quantity of HAP listed in Table 1 of Subpart GGGGG that will be removed during all site remediations will be less than 1 Mg/yr. <i>If the answer to Question VIII.CC.5 is "Yes," go to Section VIII.DD.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
6. The site remediation will be completed within 30 consecutive calendar days.	<input type="checkbox"/> Yes <input type="checkbox"/> No
7. No site remediation will exceed 30 consecutive calendar days. <i>If the answer to Question VIII.CC.7 is "Yes," go to Section VIII.DD.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
8. Site remediation materials subject to 40 CFR Part 63, Subpart GGGGG are transferred from the application area to an off-site facility.	<input type="checkbox"/> Yes <input type="checkbox"/> No
9. All site remediation materials subject to 40 CFR Part 63, Subpart GGGGG are transferred from the application area to an off-site facility. <i>If the answer to Question VIII.CC.9 is "Yes," go to Section VIII.DD.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No

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For SOP applications, answer ALL questions unless otherwise directed.

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

VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
CC. Subpart GGGGG - National Emission Standards for Hazardous Air Pollutants: Site Remediation (continued)		
10.	The application area includes a remediation material management unit used for cleanup of radioactive mixed waste per § 63.7886(c).	<input type="checkbox"/> Yes <input type="checkbox"/> No
11.	The application area includes a remediation material management unit or combination of units with a total annual quantity of HAP less than 1 Mg/yr that is being exempted from § 63.7886(b) per § 63.7886(d).	<input type="checkbox"/> Yes <input type="checkbox"/> No
12.	The application area includes a remediation material management unit that has an average total VOHAP concentration of remediation material less than 500 ppmw and is complying with § 63.7886(b)(2). <i>If the response to Question VIII.CC.12 is "No," go to Question VIII.CC.14.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
13.	The application area includes a remediation material management unit that concentrates all or part of the material such that the material's VOHAP concentration could increase.	<input type="checkbox"/> Yes <input type="checkbox"/> No
14.	The application area includes containers that manage site remediation materials subject to 40 CFR Part 63, Subpart GGGGG. <i>If the response to Question VIII.CC.14 is "No," go to Question VIII.CC.21.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
15.	The application area includes containers that are also subject to and complying with another subpart under 40 CFR part 61 or part 63 per § 63.7886(b)(3).	<input type="checkbox"/> Yes <input type="checkbox"/> No
16.	The application area includes containers that are complying with alternative work practice standards that have been approved by the EPA per § 63.7900(e).	<input type="checkbox"/> Yes <input type="checkbox"/> No
17.	The application area includes containers using Container Level 1 controls as specified in 40 CFR § 63.922(b).	<input type="checkbox"/> Yes <input type="checkbox"/> No
18.	The application area includes containers with a capacity greater than 0.46 m <sup>3</sup> that meet the requirements of 40 CFR § 63.7900(b)(3)(i) and (ii).	<input type="checkbox"/> Yes <input type="checkbox"/> No
19.	The application area includes containers using Container Level 2 controls as specified in 40 CFR § 63.923(b).	<input type="checkbox"/> Yes <input type="checkbox"/> No
20.	The application area includes containers using Container Level 3 controls as specified in 40 CFR § 63.924(b).	<input type="checkbox"/> Yes <input type="checkbox"/> No
21.	The application area includes individual drain systems complying with the requirements of 40 CFR § 63.962.	<input type="checkbox"/> Yes <input type="checkbox"/> No



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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
DD. Subpart YYYYYY - National Emission Standards for Hazardous Air Pollutants for Area/Sources: Electric Arc Furnace Steelmaking Facilities		
1.	The application area includes an electric arc furnace (EAF) steelmaking facility, and the site is an area source of hazardous air pollutant (HAP) emissions. <i>If the response to Question VIII.DD.1 is "No," go to Section VIII.EE.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.	The EAF steelmaking facility is a research and development facility. <i>If the response to Question VIII.DD.2 is "Yes," go to Section VIII.EE.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.	Metallic scrap is utilized in the EAF.	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.	Scrap containing motor vehicle scrap is utilized in the EAF.	<input type="checkbox"/> Yes <input type="checkbox"/> No
5.	Scrap not containing motor vehicle scrap is utilized in the EAF.	<input type="checkbox"/> Yes <input type="checkbox"/> No
EE. Subpart BBBBBB - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities		
1.	The application area is located at a site that is an area source of HAPs. <i>If the answer to Question EE.1 is "No," go to Section VIII.FF.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.	The application area includes a pipeline breakout station, as defined in 40 CFR Part 63, Subpart BBBBBB, not subject to the control requirements of 40 CFR Part 63, Subpart R.	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.	The application area includes a pipeline pumping station as defined in 40 CFR Part 63, Subpart BBBBBB.	<input type="checkbox"/> Yes <input type="checkbox"/> No

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

VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for		
EE. Subpart BBBBBB - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities (continued)		
4.	The application area includes a bulk gasoline plant as defined in 40 CFR Part 63, Subpart BBBBBB. <i>If the answer to Question VIII.EE.4 is "No," go to Question VIII.EE.6.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
5.	The bulk gasoline plant was operating, prior to January 10, 2010, in compliance with an enforceable State, local or tribal rule or permit that requires submerged fill as specified in 40 CFR § 63.11086(a).	<input type="checkbox"/> Yes <input type="checkbox"/> No
6.	The application area includes a bulk gasoline terminal, as defined in 40 CFR Part 63, Subpart BBBBBB, not subject to the control requirements of 40 CFR Part 63, Subpart R or Subpart CC. <i>If the answer to Question VIII.EE.6 is "No," go to Section VIII.FF.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
7.	The bulk gasoline terminal has throughput of less than 250,000 gallons per day. <i>If the answer to Question VIII.EE.7 is "Yes," go to Section VIII.FF.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
8.	The bulk gasoline terminal loads gasoline into gasoline cargo tanks other than railcar cargo tanks.	<input type="checkbox"/> Yes <input type="checkbox"/> No
9.	The bulk gasoline terminal loads gasoline into railcar cargo tanks. <i>If the answer to Question VIII.EE.9 is "No," go to Section VIII.FF.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
10.	The bulk gasoline terminal loads gasoline into railcar cargo tanks which do not collect vapors from a vapor balance system.	<input type="checkbox"/> Yes <input type="checkbox"/> No



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<b>VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)</b>		
<b>EE. Subpart BBBBBB - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities (continued)</b>		
11.	The bulk gasoline terminal loads gasoline into railcar cargo tanks which collect vapors from a vapor balance system and that system complies with a Federal, State, local, tribal rule or permit.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>FF. Subpart CCCCCC - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities</b>		
◆ 1.	The application area is located at a site that is an area source of hazardous air pollutants. <i>If the answer to Question VIII.FF.1 is "No," go to Section VIII.GG.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆ 2.	The application area includes at least one gasoline dispensing facility as defined in 40 CFR § 63.11132. <i>If the answer to Question VIII.FF.2 is "No," go to Section VIII.GG.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 3.	The application area includes at least one gasoline dispensing facility with a monthly throughput of less than 10,000 gallons.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 4.	The application area includes at least one gasoline dispensing facility where gasoline is dispensed from a fixed gasoline storage tank into a portable gasoline tank for the on-site delivery and subsequent dispensing into other gasoline-fueled equipment.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>GG. Recently Promulgated 40 CFR Part 63 Subparts</b>		
◆ 1.	The application area is subject to one or more promulgated 40 CFR Part 63 subparts not addressed on this form. <i>If the response to Question VIII.GG.1 is "No," go to Section IX. A list of promulgated 40 CFR Part 63 subparts not otherwise addressed on OP-REQ1 is included in the instructions.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆ 2.	Provide the Subpart designation (i.e. Subpart EEE) in the space provided below.	

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<b>IX. Title 40 Code of Federal Regulations Part 68 (40 CFR Part 68) - Chemical Accident Prevention Provisions</b>		
<b>A. Applicability</b>		
◆ 1.	The application area contains processes subject to 40 CFR Part 68, Chemical Accident Prevention Provisions, and specified in 40 CFR § 68.10.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>X. Title 40 Code of Federal Regulations Part 82 (40 CFR Part 82) - Protection of Stratospheric Ozone</b>		
<b>A. Subpart A - Production and Consumption Controls</b>		
◆ 1.	The application area is located at a site that produces, transforms, destroys, imports, or exports a controlled substance or product.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
<b>B. Subpart B - Servicing of Motor Vehicle Air Conditioners</b>		
◆ 1.	Servicing, maintenance, and/or repair of fleet vehicle air conditioning systems using ozone-depleting refrigerants is conducted in the application area.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>C. Subpart C - Ban on Nonessential Products Containing Class I Substances and Ban on Nonessential Products Containing or Manufactured with Class II Substances</b>		
◆ 1.	The application area sells or distributes one or more nonessential products (which release a Class I or Class II substance) that are subject to 40 CFR Part 82, Subpart C.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
<b>D. Subpart D - Federal Procurement</b>		
◆ 1.	The application area is owned/operated by a department, agency, or instrumentality of the United States.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
<b>E. Subpart E - The Labeling of Products Using Ozone Depleting Substances</b>		
◆ 1.	The application area includes containers in which a Class I or Class II substance is stored or transported prior to the sale of the Class I or Class II substance to the ultimate consumer.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
◆ 2.	The application area is a manufacturer, importer, wholesaler, distributor, or retailer of products containing a Class I or Class II substance.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
◆ 3.	The application area is a manufacturer, importer, wholesaler, distributor, or retailer of products manufactured with a process that uses a Class I or Class II substance.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A

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

<b>X. Title 40 Code of Federal Regulations Part 82 (40 CFR Part 82) - Protection of Stratospheric Ozone (continued)</b>		
<b>F. Subpart F - Recycling and Emissions Reduction</b>		
◆ 1.	Servicing, maintenance, and/or repair on refrigeration and non-motor vehicle air condition appliances using ozone-depleting refrigerants or non-exempt substitutes is conducted in the application area.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆ 2.	Disposal of appliances (including motor vehicle air conditioners) or refrigerant or non-exempt substitute reclamation occurs in the application area.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
◆ 3.	The application area manufactures appliances or refrigerant recycling and recovery equipment.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
<b>G. Subpart G - Significant New Alternatives Policy Program</b>		
◆ 1.	The application area manufactures, formulates, or creates chemicals, product substitutes, or alternative manufacturing processes that are intended for use as a replacement for a Class I or Class II compound. <i>If the response to Question X.G.1 is "No" or "N/A," go to Section X.H.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
◆ 2.	All substitutes produced by the application area meet one or more of the exemptions in 40 CFR § 82.176(b)(1) - (7).	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<b>H. Subpart H -Halon Emissions Reduction</b>		
◆ 1.	Testing, servicing, maintaining, repairing, or disposing of equipment containing halons is conducted in the application area.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
◆ 2.	Disposal of halons or manufacturing of halon blends is conducted in the application area.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
<b>XI. Miscellaneous</b>		
<b>A. Requirements Reference Tables (RRT) and Flowcharts</b>		
1.	The application area contains units that are potentially subject to a regulation for which the TCEQ has not developed an RRT and flowchart.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

<b>XI. Miscellaneous (continued)</b>		
<b>B. Forms</b>		
◆ 1.	The application area contains units that are potentially subject to a regulation for which the TCEQ has not developed a unit attribute form. <i>If the response to Question XI.B.1 is "No," or "N/A," go to Section XI.C.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
◆ 2.	Provide the Part and Subpart designation for the federal rule(s) or the Chapter, Subchapter, and Division designation for the State regulation(s) in the space provided below.	
<b>C. Emission Limitation Certifications</b>		
◆ 1.	The application area includes units for which federally enforceable emission limitations have been established by certification.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>D. Alternative Means of Control, Alternative Emission Limitation or Standard, or Equivalent Requirements</b>		
1.	The application area is located at a site that is subject to a site-specific requirement of the state implementation plan (SIP).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.	The application area includes units located at the site that are subject to a site-specific requirement of the SIP.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
3.	The application area includes units which demonstrate compliance by using an alternative means of control, alternative emission limitation or standard or equivalent requirements approved by the EPA Administrator. <i>If the response to Question XI.D.3 is "Yes," please include a copy of the approval document with the application.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
4.	The application area includes units which demonstrate compliance by using an alternative means of control, alternative emission limitation or standard or equivalent requirements approved by the TCEQ Executive Director. <i>If the response to Question XI.D.4 is "Yes," please include a copy of the approval document with the application.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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For SOP applications, answer ALL questions unless otherwise directed.

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

<b>XI. Miscellaneous (continued)</b>		
<b>E. Title IV - Acid Rain Program</b>		
1.	The application area includes emission units subject to the Acid Rain Program (ARP), including the Opt-In Program.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.	The application area includes emission units qualifying for the new unit exemption under 40 CFR § 72.7.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
3.	The application area includes emission units qualifying for the retired unit exemption under 40 CFR § 72.8.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>F. 40 CFR Part 97, Subpart EEEEE - Cross-State Air Pollution Rule (CSAPR) NO<sub>x</sub> Ozone Season Group 2 Trading Program</b>		
1.	The application area includes emission units subject to the requirements of the CSAPR NO <sub>x</sub> Ozone Season Group 2 Trading Program. <i>If the response to Question XI.F.1 is "No," go to Question XI.F.7.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.	The application area includes units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart H for NO <sub>x</sub> and heat input.	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.	The application area includes gas or oil-fired units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart H for NO <sub>x</sub> , and the monitoring requirements of 40 CFR Part 75, Appendix D for heat input.	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.	The application area includes gas or oil-fired peaking units that are complying with the monitoring requirements of 40 CFR Part 75, Appendix E for NO <sub>x</sub> , and the monitoring requirements of 40 CFR Part 75, Appendix D for heat input.	<input type="checkbox"/> Yes <input type="checkbox"/> No
5.	The application area includes gas or oil-fired units that are complying with the Low Mass Emissions monitoring requirements of 40 CFR § 75.19 for NO <sub>x</sub> and heat input.	<input type="checkbox"/> Yes <input type="checkbox"/> No
6.	The application area includes units that are complying with EPA-approved alternative monitoring system requirements of 40 CFR Part 75, Subpart E for NO <sub>x</sub> and heat input.	<input type="checkbox"/> Yes <input type="checkbox"/> No
7.	The application area includes emission units that qualify for the CSAPR NO <sub>x</sub> Ozone Season Group 2 retired unit exemption.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

<b>XI. Miscellaneous (continued)</b>		
<b>G. 40 CFR Part 97, Subpart FFFFF - Texas SO<sub>2</sub> Trading Program</b>		
1.	The application area includes emission units complying with the requirements of the Texas SO <sub>2</sub> Trading Program. <i>If the response to Question XI.G.1 is "No," go to Question XI.G.6.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.	The application area includes units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart B for SO <sub>2</sub> and 40 CFR Part 75, Subpart H for heat input.	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.	The application area includes gas or oil-fired units that are complying with the monitoring requirements of 40 CFR Part 75, Appendix D for SO <sub>2</sub> and heat input.	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.	The application area includes gas or oil-fired units that are complying with the Low Mass Emissions monitoring requirements of 40 CFR § 75.19 for SO <sub>2</sub> and heat input.	<input type="checkbox"/> Yes <input type="checkbox"/> No
5.	The application area includes units that are complying with EPA-approved alternative monitoring system requirements of 40 CFR Part 75, Subpart E for SO <sub>2</sub> and heat input.	<input type="checkbox"/> Yes <input type="checkbox"/> No
6.	The application area includes emission units that qualify for the Texas SO <sub>2</sub> Trading Program retired unit exemption.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>H. Permit Shield (SOP Applicants Only)</b>		
1.	A permit shield for negative applicability entries on Form OP-REQ2 (Negative Applicable Requirement Determinations) is being requested or already exists in the permit.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

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

<b>XI. Miscellaneous (continued)</b>		
<b>I. GOP Type (Complete this section for GOP applications only)</b>		
◆ 1.	The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under GOP No. 511 - Oil and Gas General Operating Permit for Brazoria, Chambers, Collin, Dallas, Denton, El Paso, Ellis, Fort Bend, Galveston, Hardin, Harris, Jefferson, Johnson, Kaufman, Liberty, Montgomery, Orange, Parker, Rockwall, Tarrant, Waller, and Wise Counties.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 2.	The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under GOP No. 512 - Oil and Gas General Operating Permit for Gregg, Nueces, and Victoria Counties.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 3.	The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under GOP No. 513 - Oil and Gas General Operating Permit for Aransas, Bexar, Calhoun, Matagorda, San Patricio, and Travis Counties.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 4.	The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under GOP No. 514 - Oil and Gas General Operating Permit for All Texas Counties Except Aransas, Bexar, Brazoria, Calhoun, Chambers, Collin, Dallas, Denton, El Paso, Ellis, Fort Bend, Galveston, Gregg, Hardin, Harris, Jefferson, Johnson, Kaufman, Liberty, Matagorda, Montgomery, Nueces, Orange, Parker, Rockwall, San Patricio, Tarrant, Travis, Victoria, Waller, and Wise County.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 5.	The application area is applying for initial issuance, revision, or renewal of a solid waste landfill general operating permit under GOP No. 517 - Municipal Solid Waste Landfill general operating permit.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>J. Title 30 TAC Chapter 101, Subchapter H</b>		
◆ 1.	The application area is located in a nonattainment area. <i>If the response to Question XI.J.1 is "No," go to Question XI.J.3.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆ 2.	The applicant has or will generate emission reductions to be credited in the TCEQ Emissions Banking and Trading Program.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
◆ 3.	The applicant has or will generate discrete emission reductions to be credited in the TCEQ Emissions Banking and Trading Program.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A



# Application Area-Wide Applicability Determinations and General Information

## Form OP-REQ1 (Page 83)

### Federal Operating Permit Program

### Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
09/03/2025	O1781	100225374

For SOP applications, answer ALL questions unless otherwise directed.

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

<b>XI. Miscellaneous (continued)</b>		
<b>J. Title 30 TAC Chapter 101, Subchapter H (continued)</b>		
◆ 4.	The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area where the facilities have a collective uncontrolled design capacity to emit 10 tpy or more of NO <sub>x</sub> . <i>If the response to Question XI.J.4 is "Yes," go to Question XI.J.6.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆ 5.	The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area where the facilities previously had a collective uncontrolled design capacity to emit 10 tpy or more of NO <sub>x</sub> and is subject to 101.351(c).	<input type="checkbox"/> Yes <input type="checkbox"/> No
6.	The application area includes an electric generating facility permitted under 30 TAC Chapter 116, Subchapter I.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆ 7.	The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area and the site has a potential to emit more than 10 tpy of highly reactive volatile organic compounds (HRVOC) from facilities covered under 30 TAC Chapter 115, Subchapter H, Divisions 1 and 2.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆ 8.	The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area, the site has a potential to emit 10 tpy or less of HRVOC from covered facilities and the applicant is opting to comply with the requirements of 30 TAC Chapter 101, Subchapter H, Division 6, Highly Reactive VOC Emissions Cap and Trade Program.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>K. Periodic Monitoring</b>		
◆ 1.	The applicant or permit holder is submitting at least one periodic monitoring proposal described on Form OP-MON in this application. <i>If the response to Question XI.K.1 is "Yes," go to Section XI.L.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆ 2.	The permit currently contains at least one periodic monitoring requirement. <i>If the responses to Questions XI.K.1 and XI.K.2 are both "No," go to Section XI.L.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 3.	All periodic monitoring requirements are being removed from the permit with this application.	<input type="checkbox"/> Yes <input type="checkbox"/> No



# Application Area-Wide Applicability Determinations and General Information

## Form OP-REQ1 (Page 84)

### Federal Operating Permit Program

### Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
09/03/2025	O1781	100225374

For SOP applications, answer ALL questions unless otherwise directed.

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

XI. Miscellaneous (continued)		
L. Compliance Assurance Monitoring		
◆ 1.	The application area includes at least one unit that does not meet the CAM exemptions in 40 CFR § 64.2(b) for all applicable requirements that it is subject to, and the unit has a pre-control device potential to emit greater than or equal to the amount in tons per year required in a site classified as a major source. <i>If the response to Question XI.L.1 is "No," go to Section XI.M.</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
◆ 2.	The unit or units defined by XI.L.1 are using a control device to comply with an applicable requirement. <i>If the response to Question XI.L.2 is "No," go to Section XI.M.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆ 3.	The permit holder has submitted a CAM proposal on Form OP-MON in a previous application.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 4.	The owner/operator or permit holder is submitting a CAM proposal on Form OP-MON according to the deadlines for submittals in 40 CFR § 64.5 in this application. <i>If the responses to Questions XI.L.3 and XI.L.4 are both "No," go to Section XI.M.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
5.	The owner/operator or permit holder is submitting a CAM implementation plan and schedule to be incorporated as enforceable conditions in the permit.	<input type="checkbox"/> Yes <input type="checkbox"/> No
6.	Provide the unit identification numbers for the units for which the applicant is submitting a CAM implementation plan and schedule in the space below.	
◆ 7.	At least one unit defined by XI.L.1 and XI.L.2 is using a CEMS, COMS or PEMS meeting the requirements of 40 CFR § 64.3(d)(2).	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 8.	All units defined by XI.L.1 and XI.L.2 are using a CEMS, COMS or PEMS meeting the requirements of 40 CFR § 64.3(d)(2). <i>If the response to Question XI.L.8 is "Yes," go to Section XI.M.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No

# Application Area-Wide Applicability Determinations and General Information

## Form OP-REQ1 (Page 85)

### Federal Operating Permit Program

### Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
09/03/2025	O1781	100225374

For SOP applications, answer ALL questions unless otherwise directed.

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

<b>XI. Miscellaneous (continued)</b>		
<b>L. Compliance Assurance Monitoring (continued)</b>		
◆ 9.	At least one of the CAM proposals as described by question XI.L.3 or XI.L.4 addresses particulate matter, and the emission unit has a capture system as defined in 40 CFR §64.1.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 10.	At least one of the CAM proposals as described by question XI.L.3 or XI.L.4 addresses VOC, and the emission unit has a capture system as defined in 40 CFR §64.1.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 11.	At least one of the CAM proposals as described by question XI.L.3 or XI.L.4 addresses a regulated pollutant other than particulate matter or VOC, and the emission unit has a capture system as defined in 40 CFR §64.1.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 12.	The control device in the CAM proposal as described by question XI.L.3 or XI.L.4 has a bypass.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>M. Title 30 TAC Chapter 113, Subchapter D, Division 5 - Emission Guidelines and Compliance Times</b>		
◆ 1.	The application area includes at least one air curtain incinerator that commenced construction on or before December 9, 2004. <i>If the response to Question XI.M.1 is "No," or "N/A," go to Section XII.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
◆ 2.	All air curtain incinerators constructed on or before December 9, 2004 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>XII. New Source Review (NSR) Authorizations</b>		
<b>A. Waste Permits with Air Addendum</b>		
◆ 1.	The application area includes a Municipal Solid Waste Permit or an Industrial Hazardous Waste with an Air Addendum. <i>If the response to XII.A.1 is "Yes," include the waste permit numbers and issuance date in Section XII.J.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

**Application Area-Wide Applicability Determinations and General Information**  
**Form OP-REQ1 (Page 86)**  
**Federal Operating Permit Program**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
09/03/2025	O1781	100225374

For SOP applications, answer ALL questions unless otherwise directed.

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

XII. New Source Review (NSR) Authorizations (continued)		
B. Air Quality Standard Permits		
◆ 1.	The application area includes at least one Air Quality Standard Permit NSR authorization. <i>If the response to XII.B.1 is "No," go to Section XII.C. If the response to XII.B.1 is "Yes," be sure to include the standard permit's registration numbers in Section XII.H and answer XII.B.2 - B.16 as appropriate.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆ 2.	The application area includes at least one "State Pollution Control Project" Air Quality Standard Permit NSR authorization under 30 TAC § 116.617.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 3.	The application area includes at least one non-rule Air Quality Standard Permit for Pollution Control Projects NSR authorization.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 4.	The application area includes at least one "Installation and/or Modification of Oil and Gas Facilities" Air Quality Standard Permit NSR authorization under 30 TAC § 116.620.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 5.	The application area includes at least one non-rule Air Quality Standard Permit for Oil and Gas Handling and Production Facilities NSR authorization.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 6.	The application area includes at least one "Municipal Solid Waste Landfill" Air Quality Standard Permit NSR authorization under 30 TAC § 116.621.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 7.	The application area includes at least one "Municipal Solid Waste Landfill Facilities and Transfer Stations" Standard Permit authorization under 30 TAC Chapter 330, Subchapter U.	<input type="checkbox"/> Yes <input type="checkbox"/> No
8.	The application area includes at least one "Concrete Batch Plant" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> Yes <input type="checkbox"/> No
9.	The application area includes at least one "Concrete Batch Plant with Enhanced Controls" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> Yes <input type="checkbox"/> No
10.	The application area includes at least one "Hot Mix Asphalt Plant" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> Yes <input type="checkbox"/> No

# Application Area-Wide Applicability Determinations and General Information

## Form OP-REQ1 (Page 87)

### Federal Operating Permit Program

### Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
09/03/2025	O1781	100225374

For SOP applications, answer ALL questions unless otherwise directed.

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

XII. New Source Review (NSR) Authorizations (continued)		
B. Air Quality Standard Permits (continued)		
◆ 11.	The application area includes at least one "Rock Crusher" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 12.	The application area includes at least one "Electric Generating Unit" Air Quality Standard Permit NSR authorization. <i>If the response to XII.B.12 is "No," go to Question XII.B.15.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 13.	For purposes of "Electric Generating Unit" Air Quality Standard Permit, the application area is located in the East Texas Region.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 14.	For purposes of "Electric Generating Unit" Air Quality Standard Permit, the application area is located in the West Texas Region.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 15.	The application area includes at least one "Boiler" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 16.	The application area includes at least one "Sawmill" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> Yes <input type="checkbox"/> No
C. Flexible Permits		
1.	The application area includes at least one Flexible Permit NSR authorization.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D. Multiple Plant Permits		
1.	The application area includes at least one Multi-Plant Permit NSR authorization.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

**Application Area-Wide Applicability Determinations and General Information**  
**Form OP-REQ1 (Page 88)**  
**Federal Operating Permit Program**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
09/03/2025	O1781	100225374

For SOP applications, answer ALL questions unless otherwise directed.

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

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

**E. PSD Permits and PSD Major Pollutants**

Permit No.	Issuance Date	Pollutant(s):	Permit No.	Issuance Date	Pollutant(s):

If PSD Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: [www.tceq.texas.gov/permitting/air/titlev/site/site\\_experts.html](http://www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html).

**F. Nonattainment (NA) Permits and NA Major Pollutants**

Permit No.	Issuance Date	Pollutant(s):	Permit No.	Issuance Date	Pollutant(s):

If NA Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: [www.tceq.texas.gov/permitting/air/titlev/site/site\\_experts.html](http://www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html).

**G. NSR Authorizations with FCAA § 112(g) Requirements**

NSR Permit No.	Issuance Date	NSR Permit No.	Issuance Date	NSR Permit No	Issuance Date

**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.
09/03/2025	O1781	100225374

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
21720	08/01/2013				

◆ **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
102.261	11/1/2003	51	9/13/1993		
102.262	11/1/2003	106	9/23/1982		
102.263	11/1/2003				
106.375	9/4/2000				
106.454	11/1/2001				
106.472	9/4/2000				
106.473	9/4/2000				
106.474	9/4/2000				

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

Permit No.	Issuance Date	Permit No.	Issuance Date	Permit No.	Issuance Date

## **5.0 COMPLIANCE CERTIFICATION**

**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: 100225374
CN: 60360721
Account No.: LA-0183-P
Permit No.: O1781
Project No.:
Area Name: Paris Plant
Company Name: Silgan Containers Manufacturing Corporation
<b>II. Certification Type</b> <i>(Please mark appropriate box)</i>
<input checked="" type="checkbox"/> Responsible Official Representative <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"/> Permit Revision, Renewal, or Reopening
<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**

**IV. Certification of Truth**

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

I, James Berry certify that I am the Responsible Official (RO)  
*(Certifier Name printed or typed)* *(RO or DAR)*

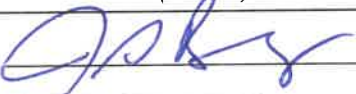
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:

*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: 09/03/2025  
*(Date 1)* *(Date 2)* *(Date 3)* *(Date 4)*

*(Date 5)* *(Date 6)*

Signature:  Signature Date: 9/3/25

Title: Plant Manager

**APPENDIX A**  
**SOURCE AND EMISSION POINT LISTING**

**SILGAN CONTAINERS MANUFACTURING CORPORATION - PARIS PLANT**  
**SUMMARY OF SOURCES**

<i>FIN</i>	<i>EPN</i>	<i>CIN</i>	<i>PROCESS DESCRIPTION</i>	<i>SOURCE DESCRIPTION</i>	<i>TYPE</i>	<i>AIR CONTAM.</i>
ES-2010	EP-201A		2-Piece Can Manufacturing	Washcoat Applicator (portion not vented through thermal oxidizer no. 2)	Point	VOC
ES-2010	EP-203A		2-Piece Can Manufacturing	Washcoat Applicator Fugitives	Fug	VOC
ES-2010	EP-202A	CD-2001	2-Piece Can Manufacturing	Washcoat Applicator (portion vented through thermal oxidizer no. 2)	Fug	VOC
ES-2020	EP-202A	CD-2001	2-Piece Can Manufacturing	Washcoat Bake Oven	Point	VOC POC
ES-2021	EP-202A	CD-2001	2-Piece Can Manufacturing	Inside Spray Machine No. 1	Point	VOC PM
ES-2022	EP-202A	CD-2001	2-Piece Can Manufacturing	Inside Spray Machine No. 2	Point	VOC PM
ES-2023	EP-202A	CD-2001	2-Piece Can Manufacturing	Inside Spray Machine No. 3	Point	VOC PM
ES-2024	EP-202A	CD-2001	2-Piece Can Manufacturing	Inside Spray Machine No. 4	Point	VOC PM
ES-2025	EP-202A	CD-2001	2-Piece Can Manufacturing	Inside Spray Machine No. 5	Point	VOC PM
ES-2026	EP-202A	CD-2001	2-Piece Can Manufacturing	Inside Spray Machine No. 6	Point	VOC PM
ES-2027	EP-202A	CD-2001	2-Piece Can Manufacturing	Inside Spray Bake Oven	Point	VOC POC
ES-2028	EP-202A	CD-2001	2-Piece Can Manufacturing	Ross Air Systems Regenerative Thermal Oxidizer No. 2	Point	VOC POC
ES-2029	EP-203A		Video Jet Ink Coding	Video Jet Marker No. 7	Fug	VOC
ES-2030	EP-203A		Video Jet Ink Coding	Video Jet Marker No. 8	Fug	VOC
ES-2031	EP-203A		Ink Dot Application	Ink Dot Printer	Fug	VOC
ES-2100	EP-203A		Solvent Degreasing	Parts Washer No. 10	Fug	VOC
ES-2110	EP-203A		Solvent Degreasing	Parts Washer No. 11	Fug	VOC
ES-2120	EP-203A		Solvent Degreasing	Parts Washer No. 12	Fug	VOC
ES-2050	EP-205A	CD-2002	2-Piece Can Manufacturing	Scrap Handling Unit No. 1	Fug	PM
ES-2060	EP-206A	CD-2003	2-Piece Can Manufacturing	Scrap Handling Unit No. 2	Fug	PM
ES-2070	EP-207A		2-Piece Can Manufacturing	Water Heater	Point	POC
ES-2080	EP-208A		2-Piece Can Manufacturing	Cooling Tower No. 1	Fug	PM
ES-2090	EP-209A		2-Piece Can Manufacturing	10,000 Gallon Inside Spray Tank	Fug	VOC
ES-2091	EP-209B		2-Piece Can Manufacturing	Inside Spray Line Fugitive	Fug	VOC
ES-2092	EP-209C		2-Piece Can Manufacturing	10,000 Gallon Washcoat Tank	Fug	VOC
ES-2093	EP-209B		2-Piece Can Manufacturing	Washcoat Line Fugitives	Fug	VOC
ES-3010	EP-301A	CD-3001	Side Seam Striping	Body Maker No. 1	Point	VOC PM
ES-3010	EP-306B		Side Seam Striping	Body Maker No. 1	Fug	VOC

**SILGAN CONTAINERS MANUFACTURING CORPORATION - PARIS PLANT  
SUMMARY OF SOURCES**

<i>FIN</i>	<i>EPN</i>	<i>CIN</i>	<i>PROCESS DESCRIPTION</i>	<i>SOURCE DESCRIPTION</i>	<i>TYPE</i>	<i>AIR CONTAM.</i>
ES-3011	EP-306B		Video Jet Ink Coding	Video Jet Marker No. 1	Fug	VOC
ES-3021	EP-306B		Video Jet Ink Coding	Video Jet Marker No. 2	Fug	VOC
ES-3030	EP-303A	CD-3003	Side Seam Striping	Body Maker No. 3	Point	VOC PM
ES-3030	EP-306B		Side Seam Striping	Body Maker No. 3	Fug	VOC
ES-3031	EP-306B		Video Jet Ink Coding	Video Jet Marker No. 3	Fug	VOC
ES-3050	EP-305A	CD-3005	Side Seam Striping	Body Maker No. 5	Point	VOC PM
ES-3051	EP-306B		Video Jet Ink Coding	Video Jet Marker No. 5	Fug	VOC
ES-3061	EP-306B		Video Jet Ink Coding	Video Jet Marker No. 6	Fug	VOC
ES-3070	EP-306B		Solvent Cleaning	Solvent Cleaning of Bodymakers	Fug	VOC
ES-3160	EP-313E		Solvent Degreasing	Parts Washer No. 19	Fug	VOC
ES-3170	EP-313E		Solvent Degreasing	Parts Washer No. 20	Fug	VOC
ES-3190	EP-306B		Solvent Degreasing	Parts Washer No. 8	Fug	VOC

Notes: POC = NOX, SO2, CO, PM, & VOC from combustion of natural gas.

**APPENDIX B**  
**TEXAS AIR QUALITY PERMIT NO. 21720**

Jon Niermann, *Chairman*  
Emily Lindley, *Commissioner*  
Bobby Janecka, *Commissioner*  
Erin E. Chancellor, *Interim Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

March 23, 2023

MR KERRY WILD  
PLANT MANAGER  
SILGAN CONTAINERS MANUFACTURING CORPORATION  
PO BOX 40  
PARIS TX 75461-0040

Re: Permit Renewal  
Permit Number: 21720  
Expiration Date: March 23, 2033  
Silgan Containers Manufacturing Corporation  
Steel Can Manufacturing Plant  
Paris, Lamar County  
Regulated Entity Number: RN100225374  
Customer Reference Number: CN600360721

Dear Mr. Wild:

Silgan Containers Manufacturing Corporation has requested to renew Permit Number 21720. This letter serves as notice that your application for the above-referenced permit is technically complete as of March 2, 2023.

In accordance with Title 30 Texas Administrative Code Section 116.314(a), Permit Number 21720 is hereby renewed. Since you certified there were no changes to your existing permit, it is renewed as written and will be in effect for ten years from the date this renewal was issued. Please attach this letter and new general conditions to your permit.

Mr. Kerry Wild  
Page 2  
March 23, 2023

Re: Permit Number: 21720

If you need further information or have any questions, please contact Mr. Alejandro Cavazos at (512) 239-4987 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

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

Enclosure

cc: Air Section Manager, Region 5 - Tyler

Project Number: 352677

## Texas Commission on Environmental Quality Air Quality Permit

*A Permit Is Hereby Issued To*  
**Silgan Containers Manufacturing Corporation**  
*Authorizing the Continued Operation of*  
**Steel Can Manufacturing Plant**  
*Located at Paris, Lamar County, Texas*  
*Latitude 33.69 Longitude -95.5625*

Permit: 21720

Issuance Date: March 23, 2023

Expiration Date: March 23, 2033



For the Commission

1. **Facilities** covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code (TAC) Section 116.116 (30 TAC § 116.116)]<sup>1</sup>
2. **Voiding of Permit.** A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of the date of issuance, discontinues construction for more than 18 months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant an 18-month extension. Before the extension is granted the permit may be subject to revision based on best available control technology, lowest achievable emission rate, and netting or offsets as applicable. One additional extension of up to 18 months may be granted if the permit holder demonstrates that emissions from the facility will comply with all rules and regulations of the commission, the intent of the Texas Clean Air Act (TCAA), including protection of the public's health and physical property; and (b)(1) the permit holder is a party to litigation not of the permit holder's initiation regarding the issuance of the permit; or (b)(2) the permit holder has spent, or committed to spend, at least 10 percent of the estimated total cost of the project up to a maximum of \$5 million. A permit holder granted an extension under subsection (b)(1) of this section may receive one subsequent extension if the permit holder meets the conditions of subsection (b)(2) of this section. [30 TAC § 116.120]
3. **Construction Progress.** Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC § 116.115(b)(2)(A)]
4. **Start-up Notification.** The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program). [30 TAC § 116.115(b)(2)(B)]
5. **Sampling Requirements.** If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC § 116.115(b)(2)(C)]
6. **Equivalency of Methods.** The permit holder must demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the permit. [30 TAC § 116.115(b)(2)(D)]
7. **Recordkeeping.** The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and operating hours;



keep all required records in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction in a timely manner; comply with any additional recordkeeping requirements specified in special conditions in the permit; and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC § 116.115(b)(2)(E)]

8. **Maximum Allowable Emission Rates.** The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources--Maximum Allowable Emission Rates." [30 TAC § 116.115(b)(2)(F)]<sup>1</sup>
9. **Maintenance of Emission Control.** The permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. The permit holder shall provide notification in accordance with 30 TAC §101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC § 116.115(b)(2)(G)]
10. **Compliance with Rules.** Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC § 116.115(b)(2)(H)]
11. **This** permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC § 116.110(e)]
12. **There** may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC § 116.115(c)]
13. **Emissions** from this facility must not cause or contribute to "air pollution" as defined in Texas Health and Safety Code (THSC) §382.003(3) or violate THSC § 382.085. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.
14. **The** permit holder shall comply with all the requirements of this permit. Emissions that exceed the limits of this permit are not authorized and are violations of this permit.<sup>1</sup>

<sup>1</sup> Please be advised that the requirements of this provision of the general conditions may not be applicable to greenhouse gas emissions.

## Common Acronyms in Air Permits

°C = Temperature in degrees Celsius	GLCmax = maximum (predicted) ground-level concentration
°F = Temperature in degrees Fahrenheit	gpm = gallon per minute
°K = Temperature in degrees Kelvin	gr/1000scf = grain per 1000 standard cubic feet
µg = microgram	gr/dscf = grain per dry standard cubic feet
µg/m <sup>3</sup> = microgram per cubic meter	H <sub>2</sub> CO = formaldehyde
acfm = actual cubic feet per minute	H <sub>2</sub> S = hydrogen sulfide
AMOC = alternate means of control	H <sub>2</sub> SO <sub>4</sub> = sulfuric acid
AOS = alternative operating scenario	HAP = hazardous air pollutant as listed in § 112(b) of the Federal Clean Air Act or Title 40 Code of Federal Regulations Part 63, Subpart C
AP-42 = Air Pollutant Emission Factors, 5th edition	HC = hydrocarbons
APD = Air Permits Division	HCl = hydrochloric acid, hydrogen chloride
API = American Petroleum Institute	Hg = mercury
APWL = air pollutant watch list	HGB = Houston/Galveston/Brazoria
BPA = Beaumont/ Port Arthur	hp = horsepower
BACT = best available control technology	hr = hour
BAE = baseline actual emissions	IFR = internal floating roof tank
bbl = barrel	in H <sub>2</sub> O = inches of water
bbl/day = barrel per day	in Hg = inches of mercury
bhp = brake horsepower	IR = infrared
BMP = best management practices	ISC3 = Industrial Source Complex, a dispersion model
Btu = British thermal unit	ISCST3 = Industrial Source Complex Short-Term, a dispersion model
Btu/scf = British thermal unit per standard cubic foot or feet	K = Kelvin; extension of the degree Celsius scaled-down to absolute zero
CAA = Clean Air Act	LACT = lease automatic custody transfer
CAM = compliance-assurance monitoring	LAER = lowest achievable emission rate
CEMS = continuous emissions monitoring systems	lb = pound
cfm = cubic feet (per) minute	lb/day = pound per day
CFR = Code of Federal Regulations	lb/hr = pound per hour
CN = customer ID number	lb/MMBtu = pound per million British thermal units
CNG = compressed natural gas	LDAR = Leak Detection and Repair (Requirements)
CO = carbon monoxide	LNG = liquefied natural gas
COMS = continuous opacity monitoring system	LPG = liquefied petroleum gas
CPMS = continuous parametric monitoring system	LT/D = long ton per day
DFW = Dallas/ Fort Worth (Metroplex)	m = meter
DE = destruction efficiency	m <sup>3</sup> = cubic meter
DRE = destruction and removal efficiency	m/sec = meters per second
dscf = dry standard cubic foot or feet	MACT = maximum achievable control technology
dscfm = dry standard cubic foot or feet per minute	MAERT = Maximum Allowable Emission Rate Table
ED = (TCEQ) Executive Director	MERA = Modeling and Effects Review Applicability
EF = emissions factor	mg = milligram
EFR = external floating roof tank	mg/g = milligram per gram
EGU = electric generating unit	mL = milliliter
EI = Emissions Inventory	MMBtu = million British thermal units
ELP = El Paso	MMBtu/hr = million British thermal units per hour
EPA = (United States) Environmental Protection Agency	MSDS = material safety data sheet
EPN = emission point number	MSS = maintenance, startup, and shutdown
ESL = effects screening level	MW = megawatt
ESP = electrostatic precipitator	NAAQS = National Ambient Air Quality Standards
FCAA = Federal Clean Air Act	NESHAP = National Emission Standards for Hazardous Air Pollutants
FCCU = fluid catalytic cracking unit	NGL = natural gas liquids
FID = flame ionization detector	NNSR = nonattainment new source review
FIN = facility identification number	NO <sub>x</sub> = total oxides of nitrogen
ft = foot or feet	NSPS = New Source Performance Standards
ft/sec = foot or feet per second	
g = gram	
gal/wk = gallon per week	
gal/yr = gallon per year	
GLC = ground level concentration	

PAL = plant-wide applicability limit  
 PBR = Permit(s) by Rule  
 PCP = pollution control project  
 PEMS = predictive emission monitoring system  
 PID = photo ionization detector  
 PM = periodic monitoring  
 PM = total particulate matter, suspended in the atmosphere, including PM<sub>10</sub> and PM<sub>2.5</sub>, as represented  
 PM<sub>2.5</sub> = particulate matter equal to or less than 2.5 microns in diameter  
 PM<sub>10</sub> = total particulate matter equal to or less than 10 microns in diameter, including PM<sub>2.5</sub>, as represented  
 POC = products of combustion  
 ppb = parts per billion  
 ppm = parts per million  
 ppmv = parts per million (by) volume  
 psia = pounds (per) square inch, absolute  
 psig = pounds (per) square inch, gage  
 PTE = potential to emit  
 RA = relative accuracy  
 RATA = relative accuracy test audit  
 RM = reference method  
 RVP = Reid vapor pressure  
 scf = standard cubic foot or feet  
 scfm = standard cubic foot or feet (per) minute  
 SCR = selective catalytic reduction  
 SIL = significant impact levels  
 SNCR = selective non-catalytic reduction  
 SO<sub>2</sub> = sulfur dioxide  
 SOCM = synthetic organic chemical manufacturing industry  
 SRU = sulfur recovery unit  
 TAC = Texas Administrative Code  
 TCAA = Texas Clean Air Act  
 TCEQ = Texas Commission on Environmental Quality  
 TD = Toxicology Division  
 TLV = threshold limit value  
 TMDL = total maximum daily load  
 tpd = tons per day  
 tpy = tons per year  
 TVP = true vapor pressure  
 VOC = volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1  
 VRU = vapor recovery unit or system

Bryan W. Shaw, Ph.D., *Chairman*  
Carlos Rubinstein, *Commissioner*  
Toby Baker, *Commissioner*  
Zak Covar, *Executive Director*



**TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**  
*Protecting Texas by Reducing and Preventing Pollution*

August 1, 2013

MR DENNIS CAVANNA  
PLANT MANAGER  
SILGAN CAN COMPANY  
PO BOX 40  
PARIS TX 75461-0040

Re: Planned Maintenance, Startup, and Shutdown  
Permit Number: 21720  
Steel Can Manufacturing Plant  
Paris, Lamar County  
Regulated Entity Number: RN100225374  
Customer Reference Number: CN600132013  
Account Number: LA-0183-P

**RECEIVED**

AUG 05 2013  
TCEQ  
CENTRAL FILE ROOM

Dear Mr. Cavanna:

This is in response to your letter received January 8, 2013, regarding your planned maintenance, startup, and shutdown (MSS) emissions for the facilities at this site.

Based on our review of your current permit, we concur that planned MSS activities for specific sources identified on the Maximum Allowable Emission Rates Table (MAERT) have been reviewed and are already included in the MAERT. Additional process and general facility MSS activities are authorized either as de minimis sources under Title 30 Texas Administrative Code (30 TAC) § 116.119 or meet the requirements for a permit by rule (PBR) under 30 TAC Chapter 106. The authorized activities have been identified in the altered permit special conditions attached to this letter. As required by 30 TAC § 106.8, adequate records must be maintained at the facility to demonstrate that the requirements of the applicable PBRs are consistently met, and adequate records should be maintained at the facility to demonstrate that the requirements for de minimis sources are consistently met. Any other planned MSS activities not authorized will need to obtain separate authorization.

Enclosed are the altered special conditions, MAERT and a new permit face to replace those currently attached to your permit. Please attach these to your permit.

Your cooperation in this matter is appreciated. If you need further information or have any questions, please contact Mr. Eddie Mack, P.E., at (512) 239-1488 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Mr. Dennis Cavanna

Page 2

August 1, 2013

Re: Permit Number: 21720

This action is taken under authority delegated by the Executive Director of the Texas Commission on Environmental Quality.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Wilson". The signature is fluid and cursive, with a large initial "M" and a stylized "W".

Michael Wilson, P.E., Director  
Air Permits Division  
Office of Air  
Texas Commission on Environmental Quality

MPW/em

Enclosure

cc: Air Section Manager, Region 5 - Tyler

Project Number: 188084



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY  
AIR QUALITY PERMIT



*A Permit Is Hereby Issued To*  
**Silgan Can Company**  
*Authorizing the Construction and Operation of*  
**Steel Can Manufacturing Plant**  
*Located at Paris, Lamar County, Texas*  
Latitude 33° 41' 24" Longitude 95° 33' 45"

Permit: 21720

Revision Date : August 1, 2013

Renewal Date: July 31, 2023

  
For the Commission

1. **Facilities** covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code 116.116 (30 TAC 116.116)]
2. **Voiding of Permit.** A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of the date of issuance, discontinues construction for more than 18 months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant an 18-month extension. Before the extension is granted the permit may be subject to revision based on best available control technology, lowest achievable emission rate, and netting or offsets as applicable. One additional extension of up to 18 months may be granted if the permit holder demonstrates that emissions from the facility will comply with all rules and regulations of the commission, the intent of the Texas Clean Air Act (TCAA), including protection of the public's health and physical property; and (b)(1) the permit holder is a party to litigation not of the permit holder's initiation regarding the issuance of the permit; or (b)(2) the permit holder has spent, or committed to spend, at least 10 percent of the estimated total cost of the project up to a maximum of \$5 million. A permit holder granted an extension under subsection (b)(1) of this section may receive one subsequent extension if the permit holder meets the conditions of subsection (b)(2) of this section. [30 TAC 116.120(a), (b) and (c)]
3. **Construction Progress.** Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC 116.115(b)(2)(A)]
4. **Start-up Notification.** The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program). [30 TAC 116.115(b)(2)(B)(iii)]
5. **Sampling Requirements.** If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC 116.115(b)(2)(C)]

6. **Equivalency of Methods.** The permit holder must demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the permit. [30 TAC 116.115(b)(2)(D)]
7. **Recordkeeping.** The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and operating hours; keep all required records in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction; comply with any additional recordkeeping requirements specified in special conditions attached to the permit; and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC 116.115(b)(2)(E)]
8. **Maximum Allowable Emission Rates.** The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources--Maximum Allowable Emission Rates." [30 TAC 116.115(b)(2)(F)]
9. **Maintenance of Emission Control.** The permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. The permit holder shall provide notification for upsets and maintenance in accordance with 30 TAC 101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC 116.115(b)(2)(G)]
10. **Compliance with Rules.** Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules, regulations, and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC 116.115(b)(2)(H)]
11. **This** permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC 116.110(e)]
12. **There** may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC 116.115(c)]
13. **Emissions** from this facility must not cause or contribute to a condition of "air pollution" as defined in Texas Health and Safety Code (THSC) 382.003(3) or violate THSC 382.085. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.
14. **The** permit holder shall comply with all the requirements of this permit. Emissions that exceed the limits of this permit are not authorized and are violations of this permit.

## Special Conditions

Permit Number 21720

1. This permit authorizes facilities in support of a steel can manufacturing plant at 500 North West Loop 286 in Paris, Lamar County, Texas. This permit covers only those sources of emissions listed in the attached table entitled "Emission Sources Maximum Allowable Emission Rates," and those sources are limited to the emission limits and other conditions specified in the attached table. The annual emission limits are based on any consecutive 12-month period.

This permit does not include the following facilities or planned maintenance, startup, or shutdown (MSS) activities at the site, except as noted in the Maximum Allowable Emission Rates Table (MAERT). Instead, these facilities are authorized under a permit by rule (PBR) by Title 30 Texas Administrative Code Chapter 106 (30 TAC Chapter 106) or are authorized as a de minimis source by 30 TAC § 116.119. The following lists are not intended to be all inclusive and can be altered at the site without modifications to this permit. **(8/13)**

Permit By Rule Facilities (30 TAC Chapter 106)	
Facility	Authorization
Acid Wash Equipment	§ 106.375
Storage Tank	§ 106.472, § 106.473, and/or § 106.474
Remote Reservoir and Cold Solvent Cleaners	§ 106.454
Filter system for facilities authorized in this permit	§ 106.263(c)(1)
Filter replacement not covered by this permit for facilities which are authorized by this permit	§ 106.263(c)(1)
Startup and shutdown activities not included in the conditions of this permit for combustion units used as control devices	§ 106.263(c)(2)
Startup and shutdown of ovens and dryers authorized by a permit	§ 106.263(c)(2)
Maintenance of ovens and dryers authorized by a permit	§ 106.263(c)(1)
Fugitive component repair, replacement; leaks – piping, pumps, valves, flanges, etc. for facilities authorized by a permit	§ 106.261, § 106.262 and/or § 106.263(c)(1)
Maintenance, startup, and shutdown of degreasers/solvent cleaning machines authorized by a Permit by Rule	§ 106.454
Maintenance, startup, and shutdown of storage tanks authorized by a Permit by Rule	§ 106.472, § 106.473, and/or § 106.474



Permit By Rule Facilities (30 TAC Chapter 106)	
Facility	Authorization
Welding, Soldering and Brazing	106.227
Routine maintenance activities which are planned and predictable and ensure the continuous normal operation of facility or control device or return a facility or control device to normal operating conditions	§ 106.263(c)(1)
Manually Operated and Hand Held Equipment	§ 106.265
Blasting, painting, and surface preparation of immovable fixed structures	§ 106.263(c)(3)(A)

De Minimis Facilities (30 TAC Chapter 116)	
Source or Activity	Authorization
Water-base surfactants/detergents less than or equal to 2,500 gallons per year, site wide	§ 116.119(a)(2)(F)
Manual Application of Cleaning or Stripping Solutions or Coatings	§ 116.119(a)(1)
Usage of organic chemicals including lubricants, greases, and oils without propellants other than air or nitrogen for maintaining equipment	§ 116.119(a)(1)
Office equipment maintenance and cleaning (printers, copiers, etc.)	§ 116.119(a)(1)
Maintenance and cleaning of in situ computer and office equipment	§ 116.119(a)(1)
Janitorial and maid services	§ 116.119(a)(1)
Maintenance of heating and cooling equipment for personal use	§ 116.119(a)(1)
Comfort air conditioning or comfort ventilation systems which are not used to remove air contaminants generated by or released from specific units or equipment	§ 116.119(a)(1)
Aerosol Can Puncturing, Recycling and Disposal	§ 116.119(a)(1)
Application of lubricants for maintaining equipment	§ 116.119(a)(1)
Aerosol Product Use – Less Than 4 Cans (64 oz)/day	§ 116.119(a)(1)

2. All point source emission stacks and all equipment that has the potential of emitting air contaminants shall be physically identified and marked in a conspicuous location (by tagging, labeling, engraving, etc.) as follows:

- A. The facility identification numbers.
- B. The emission point numbers (EPNs) as listed on the MAERT.

### **Emission Limitations**

- 3. The opacity shall not exceed 5 percent averaged over a six-minute period from each stack or vent. This determination shall be made by first observing for visible emissions while each facility is in operation. Observations shall be made at least 15 feet and no more than 0.25 mile from the emission point(s). Up to three emissions points may be read concurrently, provided that all three emissions points are within a 70 degree viewing sector or angle in front of the observer such that the proper sun position (at the observer's back) can be maintained for all three emission points. If visible emissions are observed from an emission point, then the opacity shall be determined and documented within 24 hours for that emission point using Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), Appendix A, Test Method 9. Contributions from uncombined water shall not be included in determining compliance with this condition. Observations shall be performed and recorded weekly. A certified opacity reader is not required for the visible emissions observations. If opacity exceeds 5 percent, corrective action to eliminate the source of visible emissions shall be taken promptly and documented within one week of first observation.
- 4. Site-wide hazardous air pollutant (HAP) emissions shall be less than 10 tons per year (tpy) for a single HAP and 25 tpy for all HAPs.

### **Operational Limitations**

- 5. All facilities may operate continuously.
- 6. There shall be no restrictions or obstructions to vertical discharge of air contaminants from any exhaust stack.
- 7. Volatile organic compounds (VOC) emissions from the washcoat applicators, inside spray applicators, and bake ovens shall be captured and exhausted through the thermal oxidizer (TO).
- 8. The following requirements apply to the TO.
  - A. The VOC destruction efficiency shall be 95 percent or higher.

- B. Set-point temperatures shall be maintained at or above 1400°F with an on-line minimum of 1300°F.
  - C. Temperature monitor shall be installed, calibrated, and maintained to continuously measure and record the temperature of the combustion chamber of the TO when the VOC waste stream is exhausted through the TO. The monitor shall be calibrated at least once semiannually or in accordance with the manufacturer's specifications, whichever is greater, and shall be accurate to  $\pm 5^{\circ}$  Fahrenheit.
  - D. Fuel shall be limited to pipeline-quality, sweet natural gas as supplied by the gas distributor.
  - E. Planned maintenance shall be performed only when the associated manufacturing equipment/line is not in operation.
  - F. The operating instructions for the TO shall be established and posted such that they are readily available to all of the TO operators. **(8/13)**
9. The facilities owned or leased by the permittee and Campbell Soup Company located at 500 North West Loop 286, Paris, Texas, have been designated a single property for purposes of demonstrating compliance with the Texas Commission on Environmental Quality (TCEQ) regulations and the control of air contaminant emissions. If the permittee seeks a change in emissions of an air contaminant that is or will be common to both of the single property designation parties, the owner shall perform modeling of all sources for that air contaminant within the designated single property boundary when requested to do so by the Executive Director of the TCEQ.

### **Material Flexibility**

10. In addition to the materials represented in the permit renewal application submitted on October 22, 2002 and permit amendment applications submitted on September 10, 2002, March 17, 2006, and March 4, 2010, other materials/air contaminants that meet all of the following sub-conditions are allowed. **(8/13)**
- A. There is no overall increase in the annual VOC or particulate matter emission rates on the MAERT.
  - B. The new materials shall serve the same basic function, and the emissions shall be from the same location as the emissions from the current materials.

- C. All the ingredients of the new material are known; i.e., the weight percentages of the ingredients add to 100 percent or more.
- D. The following procedure shall be completed to determine if both short-term (1-hr) and long-term (annual) impacts are acceptable for all new or increased air contaminants.
- (1) Determine the emission rate of each air contaminant ingredient including emissions of the same air contaminant from currently authorized materials that may be emitted at the same time from each emission point.
  - (2) Multiply the emission rate of the air contaminant by the unit impact multiplier for each emission point from the following table to determine the maximum off-property impact Ground Level Concentration (GLCmax) for each emission point.

EPN	Averaging Time	GLCmax ( $\mu\text{g}/\text{m}^3$ per lb/hr)
EP-201A	1-hr	17.3
	Annual	0.32
EP-202A	1-hr	7.02
	Annual	0.16
EP-203A	1-hr	15.31
	Annual	0.32
EP-209A	1-hr	42.17
	Annual	0.39
EP-209B	1-hr	30.16
	Annual	0.35
EP-209C	1-hr	43.97
	Annual	0.4
EP-301A	1-hr	15.16
	Annual	0.19

EPN	Averaging Time	GLCmax ( $\mu\text{g}/\text{m}^3$ per lb/hr)
EP-302A	1-hr	16.26
	Annual	0.19
EP-302B	1-hr	18.34
	Annual	0.2
EP-303A	1-hr	17.25
	Annual	0.2
EP-303B	1-hr	18.03
	Annual	0.21
EP-305A	1-hr	17.19
	Annual	0.21
EP-305B	1-hr	16.71
	Annual	0.21
EP-306A	1-hr	17.42
	Annual	0.21
EP-306B	1-hr	15.98
	Annual	0.21
EP-306C	1-hr	15.64
	Annual	0.21

- (3) Sum the impacts from each emission point to determine the total concentrations if emitting from multiple emission points for the new or increased air contaminant.
- (4) If both short-term and long-term impacts are less than the effects screening levels (ESL), then the constituent is approved for use in the plant. The ESL shall be obtained from the most current ESL list published by the TCEQ or as specifically derived by TCEQ Toxicology Division. The ESL shall be obtained in writing prior to the use of the new or increased air contaminant.

- E. Use of any new or increases in existing air contaminants that cannot satisfy replacement procedures outlined in this condition shall require authorization through an appropriate permit action in 30 TAC Chapter 116. **(8/13)**

### **Recordkeeping**

- 11. The following records shall be maintained at the plant site on a five-year rolling basis rather than the two-year period specified in General Condition No. 7 and shall be made readily available at the request of personnel from the TCEQ or any air pollution control agency with jurisdiction: **(8/13)**
  - A. Material Safety Data Sheets or similar documentation (including air quality/environmental data sheets) for all materials used on-site.
  - B. Data of monthly product usage and actual hours of can manufacturing operations.
  - C. The data recorded in Special Condition No. 11B shall be used to produce a monthly report that represents VOC emissions from each EPN in pounds per hour and tons emitted for the previous 12-consecutive months. Hourly emission rates may be calculated by dividing the material emission rates by the actual daily hours of operation. The records may be maintained in hard copy or electronic format and shall be kept accessible on-site with examples of the calculations performed and any assumptions made in the calculation, and the basis for those assumptions.
  - D. Field records of either weekly opacity observations as prescribed in 40 CFR Part 60, Appendix A, Test Method 9 or visible emissions observations as specified in Special Condition No. 3.
  - E. Records of HAP emissions to demonstrate compliance with Special Condition No. 4.
  - F. Records, including calculations, for all material changes that are implemented under Special Condition No. 10.
  - G. Records of inspections of ventilation systems and planned maintenance of the TO as specified in Special Condition Nos. 12 and 8E, respectively. The inspection and maintenance records shall include the date of each inspection, the name of the inspector, and any repairs and/or maintenance work performed on the TO and its capture system. **(8/13)**

- H. Records of monitored combustion chamber temperature of the TO and documentation of the calibration of the temperature monitor as specified in Special Condition No. 8C.

### **Pollution Prevention**

- 12. To the extent that design will allow, the interior and exterior of all ventilation systems in this facility will be visually inspected on a monthly basis by facility personnel. Accessible accumulations of dust, oil, etc., shall be cleaned out upon detection. Visible leaks and cracks shall, with every reasonable effort, be repaired within a week of detection.
- 13. To minimize fugitive emissions, good housekeeping shall be practiced including the following: **(8/13)**
  - A. All surface coatings and solvents shall be stored in closed containers when not in use.
  - B. All coating and solvent spills shall be cleaned up immediately using appropriate procedures, and the associated waste materials shall be stored in closed containers until properly removed from the plant site.
  - C. Towels, rags, sponges, or other materials used for cleanup operations shall be placed into closed containers immediately after use and shall be kept in storage until removed from the plant site in accordance with applicable waste regulations.
  - D. All waste coatings and solvents shall be stored in closed containers until removed from the plant site in accordance with applicable waste regulations.
  - E. All equipment shall be operated and maintained in accordance with manufacturer's instructions.

Dated August 1, 2013

# Emission Sources - Maximum Allowable Emission Rates

Permit Number 21720

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

## Air Contaminants Data

Emission Point No. (1)	Source Name (FIN) (2)	Air Contaminant Name (3)	Emission Rates (7)	
			lbs/hour	TPY (4)
Draw and Iron 2-Piece Can Manufacturing				
EP-201A	Washcoat Applicator (ES-2010)	VOC	3.07*	(6)
EP-202A	Washcoat Bake Oven (ES-2020), Washcoat Applicator (ES-2010), Inside Spray Applicators (ES-2021-2026), Inside Spray Bake Oven (ES-2027) vented through Thermal Oxidizer No. 2 (ES-2028)	VOC (Process)	2.39*	(6)
		VOC (Combustion)	0.14	(6)
		PM (Process)	0.10*	0.37
		PM <sub>10</sub> (Process)	0.06*	0.22
		PM <sub>2.5</sub> (Process)	0.06*	0.22
		PM <sub>10</sub> (Combustion)	0.20	0.86
		PM <sub>2.5</sub> (Combustion)	0.20	0.86
		NO <sub>x</sub>	2.59	11.35
		CO	2.18	9.53
EP-203A	Washcoat Applicator (ES-2010), Video Marker Nos. 7 and 8 (ES-2029 and ES-2030), Ink Dot Applicator (ES-2031), and Parts Washer Nos. 10, 11, and 12 (ES-2100, ES-2110, and ES-2120)	VOC (5)	3.10*	(6)
EP-209B	Washcoat and Inside Spray Pipeline/ Fittings (ES-2010 and ES-2093)	VOC (5)	0.40*	(6)



Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (FIN) (2)	Air Contaminant Name (3)	Emission Rates (7)	
			lbs/hour	TPY (4)
3-Piece Can Manufacturing				
EP-301A	Side Seam Applicator No. 1 (ES-3010)	VOC	2.34*	(6)
		PM	0.02*	0.09
		PM <sub>10</sub>	0.01*	0.05
		PM <sub>2.5</sub>	0.01*	0.05
EP-302A	Side Seam Applicator No. 2 (ES-3020)	VOC	2.34*	(6)
		PM	0.02*	0.09
		PM <sub>10</sub>	0.01*	0.05
		PM <sub>2.5</sub>	0.01*	0.05
EP-302B	Curing Oven for Side Seam Applicator No. 2 (ES-3022)	VOC	<0.01*	(6)
		PM <sub>10</sub>	0.01	0.02
		PM <sub>2.5</sub>	0.01	0.02
		NO <sub>x</sub>	0.06	0.27
		CO	0.05	0.23
		SO <sub>2</sub>	<0.01	<0.01
EP-303A	Side Seam Applicator No. 3 (ES-3030)	VOC	4.40*	(6)
		PM	0.04*	0.16
		PM <sub>10</sub>	0.03*	0.10
		PM <sub>2.5</sub>	0.03*	0.10

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (FIN) (2)	Air Contaminant Name (3)	Emission Rates (7)	
			lbs/hour	TPY (4)
EP-303B	Curing Oven for Side Seam Applicator No. 3 (ES-3032)	VOC	<0.01*	(6)
		PM <sub>10</sub>	0.01	0.02
		PM <sub>2.5</sub>	0.01	0.02
		NO <sub>x</sub>	0.06	0.27
		CO	0.05	0.23
		SO <sub>2</sub>	<0.01	<0.01
EP-305A	Side Seam Applicator No. 5 (ES-3050)	VOC	3.77*	(6)
		PM	0.04*	0.14
		PM <sub>10</sub>	0.02*	0.08
		PM <sub>2.5</sub>	0.02*	0.08
EP-305B	Curing Oven for Side Seam Applicator No. 5 (ES-3052)	VOC	<0.01*	(6)
		PM <sub>10</sub>	<0.01	0.01
		PM <sub>2.5</sub>	<0.01	0.01
		NO <sub>x</sub>	0.04	0.18
		CO	0.04	0.15
		SO <sub>2</sub>	<0.01	<0.01
EP-306A	Side Seam Applicator No. 6 (ES-3060)	VOC	2.34*	(6)
		PM	0.02*	0.09
		PM <sub>10</sub>	0.01*	0.05
		PM <sub>2.5</sub>	0.01*	0.05

## Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (FIN) (2)	Air Contaminant Name (3)	Emission Rates (7)	
			lbs/hour	TPY (4)
EP-306B	Side Seam Applicator Nos. 1,2, 3, 5, and 6 (ES-3010, ES-3020, ES-3030, ES-3050, and ES-3060); Video Markers No. 1, 2, 3, 5, and 6 (ES-3011, ES-3021, ES-3031, ES-3051, and ES-3061); Parts Washer Nos. 7, 8, 18, and 21 (ES-3180, ES-3190, ES-3200, and ES-3210) and Cleanup of Body Makers (ES-3070)	VOC (5)	19.50*	(6)
EP-306C	Curing Oven for Side Seam Applicator No. 6 (ES-3062)	VOC	<0.01*	(6)
		PM <sub>10</sub>	<0.01	0.01
		PM <sub>2.5</sub>	<0.01	0.01
		NO <sub>x</sub>	0.03	0.11
		CO	0.02	0.09
		SO <sub>2</sub>	<0.01	<0.01
Ancillary Equipment				
EP-205A	Scrap Handling Unit No. 1 (ES-2050)	PM	1.00	1.00
		PM <sub>10</sub>	1.00	1.00
		PM <sub>2.5</sub>	1.00	1.00
EP-206A	Scrap Handling Unit No. 2 (ES-2060)	PM	1.00	1.00
		PM <sub>10</sub>	1.00	1.00
		PM <sub>2.5</sub>	1.00	1.00

## Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (FIN) (2)	Air Contaminant Name (3)	Emission Rates (7)	
			lbs/hour	TPY (4)
EP-207A	Water Heater (ES-2070)	VOC	0.03	(6)
		PM <sub>10</sub>	0.04	0.19
		PM <sub>2.5</sub>	0.04	0.19
		NO <sub>x</sub>	0.57	2.48
		CO	0.48	2.08
		SO <sub>2</sub>	<0.01	0.02
EP-209A	Inside Spray Storage Tank (ES-2090)	VOC (5)	2.01	(6)
EP-209C	Washcoat Storage Tank (ES-2092)	VOC (5)	1.58	(6)
All Emission Points at the Site	All Sources at the Site	Individual HAP		<10.00
		All HAPs		<25.00

- (1) Emission point identification - either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name.
- (3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1  
 NO<sub>x</sub> - total oxides of nitrogen  
 SO<sub>2</sub> - sulfur dioxide  
 PM - total particulate matter, suspended in the atmosphere, including PM<sub>10</sub> and PM<sub>2.5</sub>  
 PM<sub>10</sub> - total particulate matter equal to or less than 10 microns in diameter, including PM<sub>2.5</sub>  
 PM<sub>2.5</sub> - particulate matter equal to or less than 2.5 microns in diameter  
 CO - carbon monoxide  
 HAP - hazardous air pollutant as listed in § 112(b) of the Federal Clean Air Act or Title 40 Code of Federal Regulations Part 63, Subpart C
- (4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.
- (5) Fugitive emissions
- (6) Combined VOC emission rate for Emission Point Nos. EP-201A, EP-202A, EP-203A, EP-209B, EP-301A, EP-302A, EP-302B, EP-303A, EP-303B, EP-305A, EP-305B, EP-306A, EP-306B, EP-306C, EP-207A, EP-209A, and EP-209C is 245.4 tons per year.
- (7) Emissions from maintenance, startup, and shutdown are included.
- \* The hourly emissions for the new air contaminants may be exceeded as long as the requirements in Special Condition No. 10 are met and there is no increase to production line speeds.

Date: August 1, 2013