

**06/10/2019 ----- EBTP IMS- PROJECT RECORD -----**

PROJECT#: 414376      STATUS: C      DISP CODE: \_\_\_\_\_  
RECEIVED: 05/20/2019      PROJTYPE: BTSF      ISSUED DT: 05/28/2019  
SUP-DISP DATE: 05/28/2019

**STAFF ASSIGNED TO PROJECT:**

RUANO, MELISSA

**PROJECT NOTES:**

.THIS IS AN INTERNAL DERC TRANSFER PROJECT ASSOCIATED TO CAP\_SALL PROJECT NUMBER 414375.

.ALL DERCS ARE BEING TRANSFERRED FROM TIN INC, P1854 TO INTERNATIONAL PAPER COMPANY, P3970. SEE CAP\_SALL PROJECT 414375 FOR DETAILS.

**PROJECT TRANSACTIONS****COMPANY DATA**

COMPANY NAME: TIN INC  
CUSTOMER REGISTRY ID: CN602892788

**PORTFOLIO DATA**

NUMBER: P1854 NAME: TIN INC - ORANGE LINERBOARD MILL - RN100214428

**SITE DATA**

ACCOUNT: OC0019C  
REG ENTITY ID: RN100214428  
SITE NAME: ORANGE LINERBOARD MILL  
COUNTY: ORANGE      NEAREST CITY: ORANGE  
LOCATION: APPROXIMATELY 10 MI N OF I-10 ON HWY 87

**CONTACT DATA****TRANSACTION DATA**

TRANSACTION TYPE: DERC\_SELL  
DATE ENTERED: 2019-05-28 00:00:00.0      DELETED DATE:      EFFECTIVE YEAR:  
CONTAMINATE: **NOX**      TONS: **6.20**      DOLLARS: **0**  
ALLOWANCE**0**      CERTIFICATE NO.: **D2148** COUNTY : **ORANGE**

**COMPANY DATA**

COMPANY NAME: INTERNATIONAL PAPER COMPANY  
CUSTOMER REGISTRY ID: CN601047830

**PORTFOLIO DATA**

NUMBER: P3970 NAME: INTERNATIONAL PAPER ORANGE MILL - RN100214428

**SITE DATA**

ACCOUNT: OC0019C  
REG ENTITY ID: RN100214428  
SITE NAME: ORANGE LINERBOARD MILL  
COUNTY: ORANGE      NEAREST CITY: ORANGE  
LOCATION: APPROXIMATELY 10 MI N OF I-10 ON HWY 87

**CONTACT DATA**

NAME: FRANK FRACCASTORO      TITLE: EHS&S MANAGER  
ROLE: AAR  
STREET: 1750 IP WAY  
CITY/STATE, ZIP: ORANGE, TX , 77632-  
PHONE: 409-746-7236 -  
EMAIL: FRANK.FRACCASTORO@IPAPER.COM

**TRANSACTION DATA**

TRANSACTION TYPE: DERC\_BUY

DATE ENTERED: 2019-05-28 00:00:00.0

CONTAMINATE: **NOX**

ALLOWANCE0

DELETED DATE:

TONS: **6.20**CERTIFICATE NO.: **D3420** COUNTY : **ORANGE**

EFFECTIVE YEAR:

DOLLARS: **0****COMPANY DATA**

COMPANY NAME: TIN INC

CUSTOMER REGISTRY ID: CN602892788

**PORTFOLIO DATA**

NUMBER: P1854 NAME: TIN INC - ORANGE LINERBOARD MILL - RN100214428

**SITE DATA**

ACCOUNT: OC0019C

REG ENTITY ID: RN100214428

SITE NAME: ORANGE LINERBOARD MILL

COUNTY: ORANGE

NEAREST CITY: ORANGE

LOCATION: APPROXIMATELY 10 MI N OF I-10 ON HWY 87

**CONTACT DATA****TRANSACTION DATA**

TRANSACTION TYPE: DERC\_SELL

DATE ENTERED: 2019-05-28 00:00:00.0

CONTAMINATE: **NOX**

ALLOWANCE0

DELETED DATE:

TONS: **2.30**CERTIFICATE NO.: **D2573** COUNTY : **ORANGE**

EFFECTIVE YEAR:

DOLLARS: **0****COMPANY DATA**

COMPANY NAME: INTERNATIONAL PAPER COMPANY

CUSTOMER REGISTRY ID: CN601047830

**PORTFOLIO DATA**

NUMBER: P3970 NAME: INTERNATIONAL PAPER ORANGE MILL - RN100214428

**SITE DATA**

ACCOUNT: OC0019C

REG ENTITY ID: RN100214428

SITE NAME: ORANGE LINERBOARD MILL

COUNTY: ORANGE

NEAREST CITY: ORANGE

LOCATION: APPROXIMATELY 10 MI N OF I-10 ON HWY 87

**CONTACT DATA**

NAME: FRANK FRACCASTORO

TITLE: EHS&amp;S MANAGER

ROLE: AAR

STREET: 1750 IP WAY

CITY/STATE, ZIP: ORANGE, TX , 77632-

PHONE: 409-746-7236 -

EMAIL: FRANK.FRACCASTORO@IPAPER.COM

**TRANSACTION DATA**

TRANSACTION TYPE: DERC\_BUY

DATE ENTERED: 2019-05-28 00:00:00.0

CONTAMINATE: **NOX**

ALLOWANCE0

DELETED DATE:

TONS: **2.30**CERTIFICATE NO.: **D3421** COUNTY : **ORANGE**

EFFECTIVE YEAR:

DOLLARS: **0****COMPANY DATA**

COMPANY NAME: TIN INC

CUSTOMER REGISTRY ID: CN602892788

**PORTFOLIO DATA**

NUMBER: P1854 NAME: TIN INC - ORANGE LINERBOARD MILL - RN100214428

**SITE DATA**

ACCOUNT: OC0019C  
REG ENTITY ID: RN100214428  
SITE NAME: ORANGE LINERBOARD MILL  
COUNTY: ORANGE  
LOCATION: APPROXIMATELY 10 MI N OF I-10 ON HWY 87  
NEAREST CITY: ORANGE

**CONTACT DATA****TRANSACTION DATA**

TRANSACTION TYPE: DERC\_SELL  
DATE ENTERED: 2019-05-28 00:00:00.0  
CONTAMINATE: **NOX**  
ALLOWANCE0  
DELETED DATE:  
TONS: **4.00**  
CERTIFICATE NO.: **D2818** COUNTY : **ORANGE**  
EFFECTIVE YEAR:  
DOLLARS: **0**

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**COMPANY DATA**

COMPANY NAME: INTERNATIONAL PAPER COMPANY  
CUSTOMER REGISTRY ID: CN601047830

**PORTFOLIO DATA**

NUMBER: P3970 NAME: INTERNATIONAL PAPER ORANGE MILL - RN100214428

**SITE DATA**

ACCOUNT: OC0019C  
REG ENTITY ID: RN100214428  
SITE NAME: ORANGE LINERBOARD MILL  
COUNTY: ORANGE  
LOCATION: APPROXIMATELY 10 MI N OF I-10 ON HWY 87  
NEAREST CITY: ORANGE

**CONTACT DATA**

NAME: FRANK FRACCASTORO  
ROLE: AAR  
STREET: 1750 IP WAY  
CITY/STATE, ZIP: ORANGE, TX , 77632-  
PHONE: 409-746-7236 -  
EMAIL: FRANK.FRACCASTORO@IPAPER.COM  
TITLE: EHS&S MANAGER

**TRANSACTION DATA**

TRANSACTION TYPE: DERC\_BUY  
DATE ENTERED: 2019-05-28 00:00:00.0  
CONTAMINATE: **NOX**  
ALLOWANCE0  
DELETED DATE:  
TONS: **4.00**  
CERTIFICATE NO.: **D3422** COUNTY : **ORANGE**  
EFFECTIVE YEAR:  
DOLLARS: **0**

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**COMPANY DATA**

COMPANY NAME: TIN INC  
CUSTOMER REGISTRY ID: CN602892788

**PORTFOLIO DATA**

NUMBER: P1854 NAME: TIN INC - ORANGE LINERBOARD MILL - RN100214428

**SITE DATA**

ACCOUNT: OC0019C  
REG ENTITY ID: RN100214428  
SITE NAME: ORANGE LINERBOARD MILL  
COUNTY: ORANGE  
LOCATION: APPROXIMATELY 10 MI N OF I-10 ON HWY 87  
NEAREST CITY: ORANGE

**CONTACT DATA****TRANSACTION DATA**

TRANSACTION TYPE: DERC\_SELL  
DATE ENTERED: 2019-05-28 00:00:00.0  
CONTAMINATE: **NOX**  
DELETED DATE:  
TONS: **1.00**  
EFFECTIVE YEAR:  
DOLLARS: **0**

ALLOWANCE0

CERTIFICATE NO.: **D2915** COUNTY : **ORANGE**

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**COMPANY DATA**

COMPANY NAME: INTERNATIONAL PAPER COMPANY

CUSTOMER REGISTRY ID: CN601047830

**PORTFOLIO DATA**

NUMBER: P3970 NAME: INTERNATIONAL PAPER ORANGE MILL - RN100214428

**SITE DATA**

ACCOUNT: OC0019C

REG ENTITY ID: RN100214428

SITE NAME: ORANGE LINERBOARD MILL

COUNTY: ORANGE

NEAREST CITY: ORANGE

LOCATION: APPROXIMATELY 10 MI N OF I-10 ON HWY 87

**CONTACT DATA**

NAME: FRANK FRACCASTORO

TITLE: EHS&amp;S MANAGER

ROLE: AAR

STREET: 1750 IP WAY

CITY/STATE, ZIP: ORANGE, TX , 77632-

PHONE: 409-746-7236 -

EMAIL: FRANK.FRACCASTORO@IPAPER.COM

**TRANSACTION DATA**

TRANSACTION TYPE: DERC\_BUY

DATE ENTERED: 2019-05-28 00:00:00.0

DELETED DATE:

EFFECTIVE YEAR:

CONTAMINATE: **NOX**TONS: **1.00**DOLLARS: **0**

ALLOWANCE0

CERTIFICATE NO.: **D3423** COUNTY : **ORANGE**

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**TRACKING ACTIVITIES**

PM RECEIVED DATE : 05/20/2019 PROJECT SUBMITTED : 05/20/2019 PROJECT COMPLETED : 05/28/2019

414375 + 414376



1750 IP WAY, ORANGE, TX 77632

May 15, 2019

**CERTIFIED MAIL:** 7016 3560 0000 6054 8243 & 8250  
**RETURN RECEIPT REQUESTED**

Ms. Melissa Ruano  
Emissions Banking and Trading Program Work Leader  
Texas Commission on Environmental Quality  
Emission Banking and Trading Program MC 206  
PO BOX 13087  
AUSTIN, TX 78711-3087

**RE:   *International Paper Company - Orange Mill***  
***Regulated Entity Number: RN100214428***  
***Customer Reference Number: CN601047830***  
***Account # OC-0019-C***  
***EBT Portfolio P1854***  
***Request to Transfer DERCs from TIN Inc to International Paper Co.***

Dear Ms. Ruano:

This letter is to intended to confirm that the DERCs (Discrete Emission Reduction Credits) that are deposited in TIN Inc. account (EBT Portfolio P1854) were included as part of all the "assets" that are referenced in the change of ownership documentation that was submitted to TCEQ on January 25, 2018.

Should you have any questions or require further information concerning this letter, please feel free to contact Ashish Jain, Environmental Engineer at (409) 746-7401 or by email at [Ashish.Jain@ipaper.com](mailto:Ashish.Jain@ipaper.com).

Sincerely,

A handwritten signature in blue ink, appearing to read "EJB", with a long horizontal flourish extending to the right.

Edward J. Barr  
Mill Manager

Attachments: Letter to TCEQ Dated Jan 25<sup>th</sup>, 2018 w/attachments

Cc:   Mr. Frank Fraccastoro, EHS&S Manager, Orange Mill (e-copy)  
      Ms. Corinne Martin, Sr Counsel Environment, Legal Department, International Paper Co.  
      (e-copy)

*Ms. Kathryn Saucedo, TCEQ Beaumont Regional Office*

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

**1. Article Addressed to:**

Mr. Johnny Bowers  
Air Permits Initial Review Team (MC-161)  
Texas Commission Environmental Quality  
12100 Park 35 Circle, Building C, 3<sup>rd</sup> Floor  
Austin, Texas 78753



9590 9402 2160 6193 1826 49

**2. Article Number (Transfer from service label)**

7016 3560 0000 6054 7581

PS Form 3811, July 2015 PSN 7530-02-000-9053

**COMPLETE THIS SECTION ON DELIVERY**

**A. Signature**

*Edie J. Cumberland* ☐ Agent ☐ Addressee

**B. Received by (Printed Name)**

**C. Date of Delivery**

**D. Is delivery address different from item 1?** ☐ Yes  
If YES, enter delivery address below: ☐ No

**RECEIVED**

**JAN 29 2018**

**3. Service type**

- |  |   |
|--|---|
| <input type="checkbox"/> Adult Signature                         | <input type="checkbox"/> Priority Mail Express®                     |
| <input type="checkbox"/> Adult Signature Restricted Delivery     | <input type="checkbox"/> Registered Mail™                           |
| <input checked="" type="checkbox"/> Certified Mail®              | <input type="checkbox"/> Registered Mail Restricted Delivery        |
| <input type="checkbox"/> Certified Mail Restricted Delivery      | <input checked="" type="checkbox"/> Return Receipt for Merchandise  |
| <input type="checkbox"/> Collect on Delivery                     | <input type="checkbox"/> Signature Confirmation™                    |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery | <input type="checkbox"/> Signature Confirmation Restricted Delivery |

Restricted Delivery

Domestic Return Receipt

**U.S. Postal Service™  
CERTIFIED MAIL® RECEIPT  
Domestic Mail Only**

For delivery information, visit our website at [www.usps.com](http://www.usps.com)

**OFFICIAL USE**

**Certified Mail Fee**

\$ **3.45**

**Extra Services & Fees (check box, add fee as appropriate)**

- |  |    |
|--|----|
| <input type="checkbox"/> Return Receipt (hardcopy)           | \$ |
| <input type="checkbox"/> Return Receipt (electronic)         | \$ |
| <input type="checkbox"/> Certified Mail Restricted Delivery  | \$ |
| <input type="checkbox"/> Adult Signature Required            | \$ |
| <input type="checkbox"/> Adult Signature Restricted Delivery | \$ |

**Postage**

\$ **1.63**

**Total Postage and**

\$ **7.83**

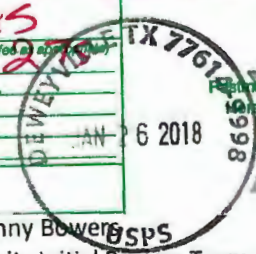
**Sent To**

Street and Apt. No.

City, State, ZIP+4®

PS Form 3800, A

Mr. Johnny Bowers  
Air Permits Initial Review Team (MC-161)  
Texas Commission Environmental Quality  
12100 Park 35 Circle, Building C, 3<sup>rd</sup> Floor  
Austin, Texas 78753



7016 3560 0000 6054 7581

1750 IP WAY  
ORANGE, TEXAS 77632

CERTIFIED MAIL 7016 3560 0000 6054 7581  
RETURN RECEIPT REQUESTED

January 25, 2018

Mr. Johnny Bowers  
Air Permits Initial Review Team  
Texas Commission on Environmental Quality  
12100 Park 35 Circle, Building C, Third Floor, MC 161  
Austin, TX 78753

RE: *International Paper – Orange Mill*  
*Air Account No. OC0019C*  
*International Paper Company (CN601047830)*  
*International Paper Company Orange Mill (RN100214428)*  
*Ownership Transfer*

Dear Mr. Bowers:

On February 13, 2012 International Paper Company became the operator of the referenced facility and documentation of that operator change was filed with your agency. At that time, TIN Inc., a wholly owned subsidiary of International Paper Company, remained the owner of the facility.

As of January 1, 2018, International Paper Company became both the owner and operator of the facility. Therefore, International Paper is submitting this cover letter along with required paperwork to complete the Change of Ownership. There will be no change in the operation of the facility.

This ownership change and clarification submitted will result in no changes in the permit conditions or in site operations. A listing of all site permits and registrations with corresponding affected Customer Numbers and Regulated Entity Numbers, an updated Core Data Form and the Air Permits Division Change of Name/Ownership Form (TCEQ 20405) are enclosed. Please update all authorizations to reflect International Paper Company (CN601047830) as the owner/operator and the Regulated Entity as International Paper Company Orange Mill (RN100214428).

Should you have any questions, please contact Frank Fraccastoro at 409-746-7236.

Respectfully Submitted,

International Paper



Edward Barr  
Mill Manager

Enclosure: Name Change Form, Core Data Form, and Permit Listing

## AUTHORITY MEMORANDUM

**TO:** Errol A. Harris, Kevin G. McWilliams, Erich Simpkins, Tim S. Nicholls, Joseph Saab, Marla F. Adair

**DATE:** December 13, 2017

**FROM:** Magda Orlewicz, Counsel Corporate Law

**COPY TO:** Thomas Hamic, David Liebetreu, Damien Bukowy, Lee Alexander, Bathsheba Sams, Robert Wenker, Bill Kidwell, Vincent Bonnot, John Buntin, Phillip Sisneros, Christopher Brucks, Holly Goughnour, Jeremy Powell, Barbara Beckerman, Robert Shands, David Arick, Brian E. Heim, Steve Loveless, Tiffanee W. Henderson

**ORIGINAL TO:** Michelle R. King, Global Subsidiaries Manager

**SUBJECT:** Pursuant to *Corporate Governance Policy #706 – Management and Governance of Subsidiaries (copy attached for your convenience)*: Request for Approval to Dissolve TIN LLC (DE) and Temple-Inland LLC (DE)

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### SUBJECT TO ATTORNEY-CLIENT PRIVILEGE

#### Purpose

Request for approval to dissolve TIN LLC and Temple-Inland LLC.

#### Background

TIN LLC and Temple-Inland LLC were converted from Delaware corporations to Delaware limited liability companies effective December 31, 2016. Temple-Inland LLC is a holding company of TIN LLC. TIN LLC is an owner of certain IPG assets which have been leased to International Paper Company ("IPCO"). The lease was designed as a temporary solution and, in order to transfer IPG assets held by TIN LLC to IPCO it is proposed to dissolve TIN LLC. Temple-Inland does not have any significant activity other than holding the membership interest in TIN LLC, and does not own any fixed assets. The impact of the dissolution of TIN LLC and Temple-Inland on the pending litigation (numerous, individual asbestos cases) was evaluated and the dissolution should not



**AUTHORITY MEMORANDUM**

Page 2 of 3

have negative impact on the proceedings. It is, therefore, recommended that TIN LLC and Temple-Inland LLC be dissolved with December 31, 2017 as the target dissolution effective date. Please confirm your approval by signing this authority memo where indicated below.

**Individuals Responsible for Ensuring Compliance**

- **Accounting Compliance:** Erich Simpkins, John Buntin
- **Legal Compliance:** Marla Adair, Magda Orlewicz
- **Tax Compliance:** Kevin McWilliams
- **Treasury Compliance:** Errol Harris

[Signature Page to Follow]

## AUTHORITY MEMORANDUM

Page 3 of 3

### Approvals:


Legal:



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Joseph R. Saab  
Associate General Counsel - IPG and  
Latin America


Legal:



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Marla F. Adair  
Chief Counsel – Global Corporate  
Governance


Tax:



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Kevin G. McWilliams  
Vice President, Tax

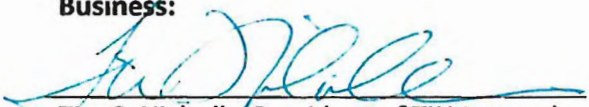
Treasury:



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Errol A. Harris  
Vice President and Treasurer

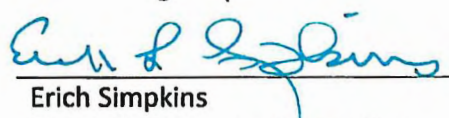
Business:



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Tim S. Nicholls, President of TIN Inc. and  
Temple-Inland Inc.

Accounting:



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Erich Simpkins  
Director Corporate Accounting

# Delaware

The First State

Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF CANCELLATION OF "TEMPLE-INLAND LLC", FILED IN THIS OFFICE ON THE TWENTY-FIRST DAY OF DECEMBER, A.D. 2017, AT 1:30 O'CLOCK P.M.

AND I DO HEREBY FURTHER CERTIFY THAT THE EFFECTIVE DATE OF THE AFORESAID CERTIFICATE OF CANCELLATION IS THE THIRTY-FIRST DAY OF DECEMBER, A.D. 2017 AT 11:45 O'CLOCK P.M.



2015873 8100  
SR# 20177719536

You may verify this certificate online at [corp.delaware.gov/authver.shtml](http://corp.delaware.gov/authver.shtml)

A handwritten signature of Jeffrey W. Bullock in black ink, written over a horizontal line.

Jeffrey W. Bullock, Secretary of State

Authentication: 203816018  
Date: 12-22-17

**STATE OF DELAWARE**  
**CERTIFICATE OF CANCELLATION**  
**OF**  
**TEMPLE-INLAND LLC**

State of Delaware  
Secretary of State  
Division of Corporations  
Delivered 01:30 PM 12/21/2017  
FILED 01:30 PM 12/21/2017  
SR 20177719536 - File Number 2015873

1. The name of the limited liability company is TEMPLE-INLAND LLC.
2. The Certificate of Formation of TEMPLE-INLAND LLC was filed on August 29, 1983.
3. The cancellation of TEMPLE-INLAND LLC was authorized on December 15, 2017, and is to be effective on December 31, 2017 at 11:45 PM EST.

IN WITNESS WHEREOF, the undersigned has executed this Certificate of Cancellation this 21st day of December, 2017.

/s/ April L. Liddle  
April L. Liddle, Authorized Person

# Delaware

The First State

Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF CANCELLATION OF "TIN LLC", FILED IN THIS OFFICE ON THE TWENTY-FIRST DAY OF DECEMBER, A.D. 2017, AT 1:31 O'CLOCK P.M.

AND I DO HEREBY FURTHER CERTIFY THAT THE EFFECTIVE DATE OF THE AFORESAID CERTIFICATE OF CANCELLATION IS THE THIRTY-FIRST DAY OF DECEMBER, A.D. 2017 AT 11:59 O'CLOCK P.M.



  
Jeffrey W. Bullock, Secretary of State

794375 8100  
SR# 20177719537

You may verify this certificate online at [corp.delaware.gov/authver.shtml](http://corp.delaware.gov/authver.shtml)

Authentication: 203816016  
Date: 12-22-17

**STATE OF DELAWARE**  
**CERTIFICATE OF CANCELLATION**  
**OF**  
**TIN LLC**

State of Delaware  
Secretary of State  
Division of Corporations  
Delivered 01:31 PM 12/21/2017  
FILED 01:31 PM 12/21/2017  
SR 20177719537 - File Number 794375

1. The name of the limited liability company is TIN LLC.
2. The Certificate of Formation of TIN LLC was filed on September 4, 1973.
3. The cancellation of TIN LLC was authorized on December 15, 2017, and is to be effective on December 31, 2017 at 11:59 PM EST.

IN WITNESS WHEREOF, the undersigned has executed this Certificate of  
Cancellation this 21st day of December, 2017.

/s/ April L. Liddle  
April L. Liddle, Authorized Person

## Attachment A

### International Paper Company

### Active Air Authorizations

Below is a list of all active air authorizations issued by TCEQ with the existing Regulated Entity and current Customer Number.

International Paper Company requests that the TCEQ update all authorizations to reflect the new Owner/Operator, new Site name and address. All authorizations should reflect International Paper Company (CN601047830) for International Paper Company Orange Mill (RN100214428).

Updated Site Owner/Operator: International Paper Company

Updated Site Name: Orange Mill

Updated Site Address: 1750 IP Way, Orange, Texas 77632

#### Existing/current authorizations and current associated RN/CN:

- Air Emissions Inventory Account Number OC0019C
  - RN100214428 International Paper Orange Mill
- Air New Source Permits AFS NUM 4836100006
  - RN100214428 International Paper Orange Mill
- Air New Source Permits Permit 9654A
  - RN100214428 International Paper Orange Mill
  - CN601047830 International Paper Company
- Air New Source Permits Registration 110026
  - RN100214428 International Paper Orange Mill
  - CN601047830 International Paper Company
- Air New Source Permits Registration 111756
  - RN100214428 International Paper Orange Mill
  - CN600127484 Inland Paperboard and Packaging, Inc.
- Air New Source Permits Registration 111757
  - RN100214428 International Paper Orange Mill
  - CN600127484 Inland Paperboard and Packaging, Inc.
- Air New Source Permits Registration 115313
  - RN100214428 International Paper Orange Mill
  - CN601047830 International Paper Company
- Air New Source Permits Registration 135409
  - RN100214428 International Paper Orange Mill Landfill
  - CN601047830 International Paper Company

## Attachment A

### International Paper Company

### Active Air Authorizations

- Air New Source Permits Registration 74025
  - RN100214428 Inland Paperboard and Packaging Orange Mill
  - CN601047830 International Paper Company
- Air New Source Permit EPA Permit N60M2
  - RN100214428 Inland Paperboard and Packaging Orange Mill
  - CN601047830 International Paper Company
- Air New Source Permit EPA Permit PSDTX833M3
  - RN100214428 Inland Paperboard and Packaging Orange Mill
  - CN601047830 International Paper Company
- Air New Source Permits Registration 149358 - Pending
  - RN100214428 International Paper Orange Mill
  - CN601047830 International Paper Company
- Air New Source Permits Registration 149424 - Pending
  - RN100214428 International Paper Orange Mill
  - CN601047830 International Paper Company
- Air Operating Permit 1408
  - RN100214428 International Paper Orange Mill
  - CN601047830 International Paper Company
- Tax Relief ID Number 17311
  - RN100214428 Orange Mill
  - CN601047830 International Paper Company
- Tax Relief ID Number 17312
  - RN100214428 Orange Mill
  - CN601047830 International Paper Company
- Tax Relief ID Number 17338
  - RN100214428 Orange Mill
  - CN601047830 International Paper Company
- Tax Relief ID Number 17339
  - RN100214428 Orange Mill
  - CN601047830 International Paper Company
- Tax Relief ID Number 19958
  - RN100214428 Orange Mill
  - CN601047830 International Paper Company



**Attachment A**  
**International Paper Company**  
**Active Air Authorizations**

- Tax Relief ID Number 20606
  - RN100214428 International Paper Orange Mill
  - CN601047830 International Paper Company
  
- Tax Relief ID Number 20624
  - RN100214428 International Paper Orange Mill
  - CN601047830 International Paper Company
  
- Tax Relief ID Number 20719
  - RN100214428 International Paper Orange Mill
  - CN601047830 International Paper Company

**Texas Commission on Environmental Quality**  
**Air Permits Division**  
**Change of Name/Ownership Form**

<b>I. Application Type</b>		
<input checked="" type="checkbox"/> Change in Ownership		<input type="checkbox"/> Change in Company Name
<b>II. Name of the New Owner or Operator of the Facilities or Equipment</b> (Legal Entity Name of the new permittee)		
A. Customer Name: International Paper Company		
B. Customer Reference Number (CN) (if issued): CN600127484, CN601047830		
C. Submittal Date: 12/01/2017		
D. Effective Date of Change: 01/01/2018		
E. Is the new owner an affiliate of the previous owner?		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
<b>III. Responsible Official (RO) Contact Information</b>		
Name ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.): Edward Barr		
Title: Mill Manager		
Company Name: International Paper Company		
Mailing Address: 1750 IP Way		
City: Orange	State: Texas	ZIP Code: 77632
Territory:		Country: USA
Foreign Postal Code:		Internal Mail Code:
Telephone No.: 409-746-7257		Fax No.:
E-mail Address: Edward.Barr@ipaper.com		
<b>IV. Technical Contact Information</b>		
Name ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.): Frank Fraccastoro		
Title: Environmental Engineer		
Company Name: International Paper Company		
Mailing Address: 1750 IP Way		
City: Orange	State: Texas	ZIP Code: 77632
Territory:		Country:
Foreign Postal Code:		Internal Mail Code:
Telephone No.: (409) 746-7236		Fax No.:
E-mail Address: Frank.Fraccastoro@ipaper.com		

**Texas Commission on Environmental Quality  
Air Permits Division  
Change of Name/Ownership Form**

<b>V. Site Information (continued)</b>							
A. Site Name: International Paper Company Orange Mill							
B. Regulated Entity Number (RN) (if issued): RN100214428							
C. Account Number (if issued): OC0019C							
D. If action is transfer of ownership, is the change for the entire site?						<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	
E. If action is transfer of ownership for a portion of the existing site, will the new site be a major source?						<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A	
F. Indicate all pollutants for which the site is a major source based on the site's potential to emit. N/A - No change from current authorizations							
Pollutant:	VOC	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	PB	HAPs
Major at the Site (YES/NO):							
Other:							
<b>VI. Air Authorizations That Are Affected By This Action</b>							
A. List all NSR authorizations (including PBR, SE, and standard permit registrations, and NSR permits), as applicable:							
See Attachment A for full list of current authorizations							
B. List all FOPs (including SOPs and ATOs under GOPs), as applicable:							
See Attachment A for full list of current authorizations							
<b>VII. NSR Conditions for Change of Ownership under 30 TAC § 116.110(e)</b>							
<ul style="list-style-type: none"> <li>The new owner agrees to be bound by all the permit conditions and all representations made in the permit and any amendments and alterations.</li> <li>The new owner asserts there will be no change in the type of pollutants emitted.</li> <li>The new owner asserts there will be no increase in the quantity emitted.</li> </ul>							

**Texas Commission on Environmental Quality  
Air Permits Division  
Change of Name/Ownership Form**

**VIII. FOP Conditions for Change of Ownership**

- For SOP holders:  
Pursuant to 30 TAC § 122.210 and § 122.211, the permit holder (new owner) is required to submit a permit revision application for a change to the permit identification of ownership or operational control of a site. The change must be facilitated by a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the old and new permit holder. This written agreement is maintained with the permit.
- For GOP holders:  
Pursuant to 30 TAC § 122.503, the permit holder (new owner) is required to submit (before the change is operated) an application for a new authorization to operate for a change to the permit identification of ownership or operational control of a site. The change must be facilitated by a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the old and new permit holder. This written agreement is maintained with the permit.

- |  |   |
|--|---|
| A. Are any other changes needed for the FOP?<br><i>(If YES, submit the information as explained in the instructions.)</i>  | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| B. Is there an Acid Rain permit or Cross-State Air Pollution Rule (CSAPR) requirements included in the SOP?<br><i>(If YES, submit the information as explained in the instructions.)</i> | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |

**IX. Authorization**

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

Signature:  Signature Date: 11/30/2017

Title: Mill Manager



## TCEQ Core Data Form

TCEQ Use Only

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

### SECTION I: General Information

1. Reason for Submission (If other is checked please describe in space provided.)		
<input type="checkbox"/> New Permit, Registration or Authorization (Core Data Form should be submitted with the program application.)		
<input type="checkbox"/> Renewal (Core Data Form should be submitted with the renewal form)	<input checked="" type="checkbox"/> Other Transfer of Ownership	
2. Customer Reference Number (if issued)	Follow this link to search for CN or RN numbers in <b>Central Registry**</b>	3. Regulated Entity Reference Number (if issued)
CN 601047830		RN 100214428

### SECTION II: Customer Information

4. General Customer Information		5. Effective Date for Customer Information Updates (mm/dd/yyyy)	
<input type="checkbox"/> New Customer		<input type="checkbox"/> Update to Customer Information	
<input type="checkbox"/> Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts)		<input checked="" type="checkbox"/> Change in Regulated Entity Ownership	
<b>The Customer Name submitted here may be updated automatically based on what is current and active with the Texas Secretary of State (SOS) or Texas Comptroller of Public Accounts (CPA).</b>			
6. Customer Legal Name (If an individual, print last name first: e.g.: Doe, John)		If new Customer, enter previous Customer below:	
International Paper Company		CN600127484; CN602787053	
7. TX SOS/CPA Filing Number	8. TX State Tax ID (11 digits)	9. Federal Tax ID (9 digits)	10. DUNS Number (if applicable)
313206	11308728051	130872805	055897763
11. Type of Customer:		Partnership: <input type="checkbox"/> General <input type="checkbox"/> Limited	
<input checked="" type="checkbox"/> Corporation		<input type="checkbox"/> Individual	
Government: <input type="checkbox"/> City <input type="checkbox"/> County <input type="checkbox"/> Federal <input type="checkbox"/> State <input type="checkbox"/> Other		<input type="checkbox"/> Sole Proprietorship	
12. Number of Employees		13. Independently Owned and Operated?	
<input type="checkbox"/> 0-20 <input type="checkbox"/> 21-100 <input type="checkbox"/> 101-250 <input type="checkbox"/> 251-500 <input checked="" type="checkbox"/> 501 and higher		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
14. Customer Role (Proposed or Actual) - as it relates to the Regulated Entity listed on this form. Please check one of the following:			
<input type="checkbox"/> Owner <input type="checkbox"/> Operator <input checked="" type="checkbox"/> Owner & Operator			
<input type="checkbox"/> Occupational Licensee <input type="checkbox"/> Responsible Party <input type="checkbox"/> Voluntary Cleanup Applicant <input type="checkbox"/> Other:			
15. Mailing Address:			
1750 IP Way			
City	Orange	State	TX
ZIP	77632	ZIP + 4	
16. Country Mailing Information (if outside USA)		17. E-Mail Address (if applicable)	
		Frank.Fraccastoro@ipaper.com	
18. Telephone Number		20. Fax Number (if applicable)	
(409) 746-7236		( )	

### SECTION III: Regulated Entity Information

21. General Regulated Entity Information (If "New Regulated Entity" is selected below this form should be accompanied by a permit application)	
<input type="checkbox"/> New Regulated Entity <input checked="" type="checkbox"/> Update to Regulated Entity Name <input checked="" type="checkbox"/> Update to Regulated Entity Information	
<b>The Regulated Entity Name submitted may be updated in order to meet TCEQ Agency Data Standards (removal of organizational endings such as Inc, LP, or LLC).</b>	
22. Regulated Entity Name (Enter name of the site where the regulated action is taking place.)	
International Paper Company Orange Mill	

23. Street Address of the Regulated Entity: (No PO Boxes)	1750 IP Way						
	City	Orange	State	TX	ZIP	77632	ZIP + 4
24. County	Orange						

Enter Physical Location Description if no street address is provided.

25. Description to Physical Location:							
26. Nearest City					State		Nearest ZIP Code
Orange					TX		77632
27. Latitude (N) In Decimal:		30.217852		28. Longitude (W) In Decimal:		-93.740946	
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds		
30	13	4.27	93	44	27.40		
29. Primary SIC Code (4 digits)		30. Secondary SIC Code (4 digits)		31. Primary NAICS Code (5 or 6 digits)		32. Secondary NAICS Code (5 or 6 digits)	
2631		2611		322130		322110	
33. What is the Primary Business of this entity? (Do not repeat the SIC or NAICS description.)							
Production of paperboard from wood chips and recycled corrugated and non-corrugated boxes							
34. Mailing Address:	1750 IP Way						
	City	Orange	State	TX	ZIP	77632	ZIP + 4
35. E-Mail Address:							
36. Telephone Number			37. Extension or Code		38. Fax Number (if applicable)		
( 409 ) 746 - 7236					( ) -		

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

<input type="checkbox"/> Dam Safety	<input type="checkbox"/> Districts	<input type="checkbox"/> Edwards Aquifer	<input checked="" type="checkbox"/> Emissions Inventory Air	<input checked="" type="checkbox"/> Industrial Hazardous Waste
<input type="checkbox"/> Municipal Solid Waste	<input type="checkbox"/> New Source Review Air	<input type="checkbox"/> OSSF	<input checked="" type="checkbox"/> Petroleum Storage Tank	<input checked="" type="checkbox"/> PWS
<input type="checkbox"/> Sludge	<input checked="" type="checkbox"/> Storm Water	<input checked="" type="checkbox"/> Title V Air	<input type="checkbox"/> Tires	<input type="checkbox"/> Used Oil
<input type="checkbox"/> Voluntary Cleanup	<input checked="" type="checkbox"/> Waste Water	<input type="checkbox"/> Wastewater Agriculture	<input type="checkbox"/> Water Rights	<input type="checkbox"/> Other:

#### SECTION IV: Preparer Information

40. Name: Jamie Koenings		41. Title: Consultant	
42. Telephone Number	43. Ext./Code	44. Fax Number	45. E-Mail Address
( 512 ) 745 - 9272		( ) -	jkoenings@disorboconsult.com

#### SECTION V: Authorized Signature

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

Company:	International Paper Company	Job Title:	Mill Manager
Name(In Print):	Edward Barr	Phone:	(409) 746-7257
Signature:		Date:	11/30/2017





**Brett Mosley**  
VICE PRESIDENT OF MANUFACTURING  
CONTAINERBOARD BUSINESS

6400 Poplar Ave.  
Memphis, TN 38197  
Business (901) 419-9000  
Fax (901) 214-0850  
brett.mosley@ipaper.com

March 4, 2016

**Subject:** Signatory Authority Delegation - International Paper Orange Containerboard Mill

**To:** All Concerned

I, Brett Mosley, Vice President of Manufacturing for International Paper's Containerboard Business, am responsible for principle business functions, policies, and decisions for all Containerboard Business sites, and do hereby authorize the following:

- The Mill Manager at the Orange Mill is authorized to certify and submit in the name of and on behalf of International Paper all environmental permit applications, reports, documentation, plans or other information relative to the Orange Mill as required by federal, state, or local permit issuing authorities as allowed under appropriate regulations.
- The Operations Manager or the Environmental Health & Safety Manager at the Orange Mill is authorized to certify and submit in the name of and on behalf of International Paper all environmental permit applications, reports, documentation, plans or other information relative to the Orange Mill as required by federal, state, or local permit issuing authorities as allowed under appropriate regulations.

Please refer any questions or correspondence regarding environmental matters to the local contact.

Sincerely,

A handwritten signature in cursive script that reads "Brett Mosley".

Brett Mosley  
VICE PRESIDENT OF MANUFACTURING  
CONTAINERBOARD BUSINESS  
INTERNATIONAL PAPER

**Texas Commission on Environmental Quality**  
**Form OP-CRO2 - Instructions**  
**Change of Responsible Official Information**

**General:**

Title 30 Texas Administrative Code § 122.165 (30 TAC § 122.165) (relating to “Certification by a Responsible Official”) states that the Texas Commission on Environmental Quality (TCEQ) shall be notified of any appointment of a new Responsible Official (RO). Notification of appointments of new Designated Representatives (DR) and/or Alternate Designated Representatives (ADR) is also required. A revised U.S. Environmental Agency (EPA) form (Certificate of Representation) must also be submitted to EPA, and a copy submitted to the TCEQ, for changes of DR and/or ADR. In order to maintain accurate records regarding applications and permits, the TCEQ requires that administrative information changes (e.g., address, phone number, or title) for the RO, DR, or ADR also be reported. This form satisfies the requirements for these notifications. See the TCEQ guidance document “Federal Operating Permit Application” for more details.

During the course of an application review, change notifications should be included in the next submittal to the TCEQ regarding the permit. Please notify the TCEQ in advance of changes. Also, note that information changes pertaining to only one type of contact may be submitted per form. If the change(s) applies to more than one individual, submit separate forms for each. *After the initial submittal, if there is a new Duly Authorized Representative (DAR) appointment or an administrative information change (e.g., address, phone number, or title) regarding the DAR, include a revised Form OP-DEL (Delegation of Responsible Official) with the next submittal to the TCEQ.*

This form must be submitted to the TCEQ Central Office to the attention of the Air Permits Division at the address below. A copy of the form must also be submitted to the appropriate TCEQ Regional Office.

This form must bear the signature of the RO, DR, or ADR. Signature stamps can be accepted in place of an original signature. Faxes and photocopies can be accepted in place of an original Form OP-CRO2; however, a follow-up submittal of the original Form OP-CRO2 is requested. **The Signature Date will be used to validate the signature authority of the RO, DR, or ADR, and must be on or after the effective date of the RO, DR, or ADR certifying to the change.** An RO, DR, or ADR cannot certify information unless the RO, DR, or ADR has signature authority. The effective date of the RO, DR, or ADR certifying to the change will be based on one of the following:

1. the date the initial application was submitted, if the name of the RO certifying to the change was included in the initial application submittal on Form OP-1 (Site Information Summary); or
2. the date the initial EPA Form 7610-1 (Certificate of Representation) was signed, if the name of the DR or ADR certifying to the change was included in the initial submittal of EPA Form 7610-1; or
3. the Appointment Effective Date on Form OP-CRO2, if the RO, DR, or ADR certifying to the change is not the original RO, DR, or ADR included in the initial Form OP-1 or EPA Form 7610-1, and the RO, DR, or ADR was changed via Form OP-CRO2.

The TCEQ also requires that a Core Data Form be submitted on all incoming registrations unless **all** of the following are met: the Regulated Entity Number (RN) and Customer Reference Numbers (CN) have been issued by the TCEQ and no core data information has changed. The Central Registry is a common record area of the TCEQ which maintains information about TCEQ customers and regulated activities, such as company names, addresses, and telephone numbers. This information is commonly referred as “core data.” The Central Registry provides the regulated community with a central access point within the agency to check core data and make changes when necessary. When core data about a facility is moved to the Central Registry, two new identification numbers are assigned: the CN and the RN. The Core Data Form is required if facility records are not yet part of the Central Registry or if core data for a facility has changed. If this is the initial registration, permit, or license for a facility site, then the Core Data Form must be completed and submitted



with application or registration forms. If amending, modifying, or otherwise updating an existing record for a facility site, the Core Data Form is not required, unless any core data information has changed. To review additional information regarding the Central Registry, go to the TCEQ Web site at, [www.tceq.texas.gov/permitting/central\\_registry/guidance.html](http://www.tceq.texas.gov/permitting/central_registry/guidance.html).

<i>Who</i>	<i>Where</i>	<i>What</i>
<b>Air Permits Division, TCEQ</b>	<b>Regular, Certified, Priority Mail:</b> Mail Code 163, P.O. Box 13087, Austin, Texas 78711-3087 <b>OR</b> <b>Hand Delivery, Overnight Mail:</b> Mail Code 163, 12100 Park 35 Circle, Building C, Third Floor, Reception Austin, Texas 78753	<b>TCEQ Core Data Form signed by the Responsible Official or Duly Authorized Representative; or the TCEQ Core Data Form and Form OP-CRO1</b>
<b>Electronic Web Based Forms</b>	<a href="http://www.tceq.texas.gov/publications/search_forms.html">www.tceq.texas.gov/publications/search_forms.html</a>	<b>TCEQ Web site</b>
<b>Appropriate TCEQ Regional Office</b>	Appropriate TCEQ Regional Office addresses can be obtained using the search feature on the TCEQ Web site at <a href="http://www.tceq.texas.gov">www.tceq.texas.gov</a> or you can call (512) 239-1250	<b>Copy of TCEQ Core Data Form signed by the Responsible Official or Duly Authorized Representative; or copies of TCEQ Core Data Form and Form OP-CRO1</b>

### Specific:

#### I. Identifying Information

- **Account No.:** Enter the primary TCEQ account number for the site if issued (XX-XXXX-).

*Note: Please use these instructions when completing Section V, if applicable.*

- **RN:** Enter the regulated entity reference number (RN) for the site if issued. This number is issued by the TCEQ as part of the central registry process. If an RN has not yet been issued, leave this space blank. Do not enter permit numbers, project numbers, account numbers, etc. in this space. (maximum 11 characters; RNXXXXXXXXXX)

*Note: Please use these instructions when completing Section V, if applicable.*

- **CN:** Enter the Customer Reference Number (CN) if issued. This number is issued by the TCEQ as part of the central registry process. If a CN has not yet been issued, leave this space blank. Do not enter permit numbers, project numbers, account numbers, etc. in this space (maximum 11 characters; CNXXXXXXXXXX).

*Note: Please use these instructions when completing Section V, if applicable.*

- **Permit No.:** Enter the operating permit number, if known (O-XXXXX). If this is an initial application submittal for an SOP, a TOP, or a GOP, the permit number will be assigned upon receipt by the TCEQ. In this case, enter "TBA" for "to be assigned." The permit number will appear on all correspondence from the TCEQ regarding a specific application or group of applications. The applicant may contact the permit review engineer for assistance.

*Note: Please use these instructions when completing Section V, if applicable.*

- **Area Name:** Enter the area name used on Form OP-1 (Site Information Summary) of the initial application. If there is only one permit at the site, the area name is the same as the site name (maximum 50 characters). *Note: Please use these instructions when completing Section V if applicable.*
- **Company Name:** Enter the name of the company, corporation, organization, individual, etc. applying for or holding the referenced permit (maximum 50 characters).

*Note: Please use these instructions when completing Section V if applicable.*

## II. Change Types

- **Action Type:** Indicate the type of action, "New Appointment" (of the RO, DR, or ADR) or "Administrative Information Change," by placing an "X" in the appropriate box.
- **Contact Type:** Indicate one of the following options for the type of appointment or the role of the individual whose information is being changed or updated by placing an "X" in the appropriate box. Only one response can be accepted per form. If the change(s) applies to more than one individual, submit separate forms for each.

Responsible Official

Designated Representative (*Acid Rain Program and/or CSAPR sources only*)

Alternate Designated Representative (*Acid Rain Program and/or CSAPR sources only*)

*Note: The DAR appointments and information changes are submitted on Form OP-DEL (see "General").*

## III. Responsible Official/Designated Representative/Alternate Designated Representative Information

- **Conventional Title:** Place an "X" next to the appropriate conventional title (Mr. /Mrs. /Ms. /Dr.).
- **Name:** For submittals with an "Action Type" designation of "NEW APPOINTMENT," enter the name of the new RO, DR, or ADR. For submittals with an "Action Type" designation of "ADMINISTRATIVE INFORMATION CHANGE," enter the name of the current RO, DR, or ADR, incorporating any necessary changes (maximum 25 characters).
- **Title:** For submittals with an "Action Type" designation of "NEW APPOINTMENT," enter the title of the new RO, DR, or ADR. For submittals with an "Action Type" designation of "ADMINISTRATIVE INFORMATION CHANGE," enter the title of the current RO, DR, or ADR, incorporating any necessary changes (maximum 25 characters).
- **Appointment Effective Date:** For submittals with an "Action Type" designation of "NEW APPOINTMENT," enter the date that the appointment of the new RO, DR, or ADR became or will become effective (MM/DD/YYYY).  
For submittals with an "Action Type" designation of "ADMINISTRATIVE INFORMATION CHANGE," leave the Appointment Effective Date blank. The signature date in Section IV will become the effective date of the information change(s).
- **Telephone Number:** For submittals with an "Action Type" designation of "NEW APPOINTMENT," enter the telephone number with the area code of the new RO, DR, or ADR. For submittals with an "Action Type"

designation of "ADMINISTRATIVE INFORMATION CHANGE," enter the telephone number of the current RO, DR, or ADR, if changed. If the telephone number is unchanged, leave the space blank.

- **Fax Number:** For submittals with an "Action Type" designation of "NEW APPOINTMENT," enter the fax number with the area code of the new RO, DR, or ADR. For submittals with an "Action Type" designation of "ADMINISTRATIVE INFORMATION CHANGE," enter the fax number of the current RO, DR, or ADR, if changed. If the fax number is unchanged, leave the space blank.
- **Company Name:** For submittals with an "Action Type" designation of "NEW APPOINTMENT," enter the company name for the new RO, DR, or ADR. For submittals with an "Action Type" designation of "ADMINISTRATIVE INFORMATION CHANGE," enter the company name of the current RO, DR, or ADR, if changed. If the company name is unchanged, leave the space blank (maximum 50 characters).
- **Mailing Address:** For submittals with an "Action Type" designation of "NEW APPOINTMENT," enter the mailing address for the new RO, DR, or ADR, including city, state, and ZIP Code. For submittals with an "Action Type" designation of "ADMINISTRATIVE INFORMATION CHANGE," enter the city, state, and ZIP Code of the mailing address for the current RO, DR, or ADR, if changed. If any portion of the mailing address is unchanged, leave the corresponding space blank (address maximum - 50 characters; city maximum - 25 characters).
- **E-mail Address:** For submittals with an "Action Type" designation of "New Appointment," enter the e-mail address for the new RO, DR, or ADR. For submittals with an "Action Type" designation of "Administrative Information Change," enter the e-mail address for the current RO, DR, or ADR, if changed. If the email address is unchanged, leave the space blank (e-mail address - maximum 50 characters).

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

For submittals with an "Action Type" designation of "NEW APPOINTMENT," enter the information of the new RO, DR, or ADR. For submittals with an "Action Type" designation of "ADMINISTRATIVE CHANGE," enter the information for the current RO, DR, or ADR.

**Certifier Name:** Print or type the name of the RO, DR, or ADR (maximum 25 characters).

**Signature:** Affix the signature of the RO, DR, or ADR.

**Signature Date:** Enter the date this form was signed by the RO, DR, or ADR (MM/DD/YYYY).

*Note: The Signature Date will be used to validate the signature authority of the RO, DR, or ADR, and must be on or after the effective date of the RO, DR, or ADR certifying to the change. See the "General" section for information regarding the effective date of an RO, DR, or ADR.*

*Extension Page:*

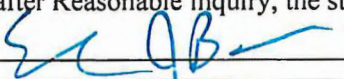
#### V. Additional Identifying Information

Complete this table only if this certification form is being used to certify information on multiple application areas or sites for which the RO, DAR, DR, or ADR has signature authority. Please see the instructions in Section I of this form for completing the identifying information.

*Note: Please include Federal Operating Permit Numbers only. New Source Review Permit Numbers should not be included on this form.*

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

The Texas Commission on Environmental Quality (TCEQ) shall be notified of a new appointment or administrative information change (e.g., address, phone number, title) for a Responsible Official (RO), Designated Representative (DR), or Alternate Designated Representative (ADR) in the next submittal. **Send this completed form to the TCEQ Central Office to the attention of the Air Permits Division.** 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 the TCEQ.*

<b>I. Identifying Information</b>			
Account No.:	OC0019C	RN:	RN100214428
		CN:	CN601047830
Permit No.:	1408	Area Name: International Paper Company Orange Mill	
Company Name:		International Paper Company	
<b>II. Change Type</b>			
Action Type:	<input checked="" type="checkbox"/> New Appointment		<input type="checkbox"/> Administrative Information Change
Contact Type ( <i>only one response can be accepted per form</i> ):			
<input checked="" type="checkbox"/> Responsible Official		<input type="checkbox"/> Designated Representative	<input type="checkbox"/> Alternate Designated Representative
<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: Edward J. Barr			
Title: Mill Manager		Appointment Effective Date: April 2016	
Telephone No.: 409-746-7257		Fax No.:	
Company Name: International Paper Company			
Mailing Address: 1750 IP Way			
City: Orange		State: TX	ZIP Code: 77632
E-mail Address: Edward.Barr@ipaper.com			
<b>IV. Certification of Truth, Accuracy, and Completeness</b>			
This certification does not extend to information, which is designated by the TCEQ as information for reference only.			
I, <u>Edward J. Barr</u> , certify that, based on information			
(Name printed or typed)			
and belief formed after Reasonable inquiry, the statements and information stated above are true, accurate, and complete.			
Signature: 		Signature Date: <u>4/30/2016</u>	

**Form OP-CRO2**  
**Change of Responsible Official (Extension)**  
**Federal Operating Permit Program**

<b>V. Additional Identifying Information</b>		
Account No.:	RN:	CN:
Permit No.:		Area Name:
Account No.:	RN:	CN:
Permit No.:		Area Name:
Account No.:	RN:	CN:
Permit No.:		Area Name:
Account No.:	RN:	CN:
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Account No.:	RN:	CN:
Permit No.:		Area Name:
Account No.:	RN:	CN:
Permit No.:		Area Name:
Account No.:	RN:	CN:
Permit No.:		Area Name:

**Reset Form**

## Melissa Ruano

---

**From:** Melissa Ruano  
**Sent:** Tuesday, May 28, 2019 11:40 AM  
**To:** Ashish Jain  
**Subject:** RE: Response Required by 5/17/2019 - Notice of Intent to Use Discrete Emission Credits, RN100214428

Good Morning Ashish,

I have completed the transfer of the Orange Mill - RN100214428 and its discrete emission credits (DERC) from TIN, INC to the International Paper Company. The site's new account (portfolio) number is **P3970**. You may view this account on our external database, available at [http://www2.tceq.texas.gov/airperm/index.cfm?fuseaction=ebt\\_dpa.start](http://www2.tceq.texas.gov/airperm/index.cfm?fuseaction=ebt_dpa.start).

The Notice of Intent to Use DERCs that was submitted on May 16, 2019 has been entered into our database and is being processed under project reference number 414377. The assigned project manager, Mr. Jacob Morrison, will contact you if he has any questions regarding your application.

As soon as possible, please have the site's Authorized Account Representative (AAR) electronically register with portfolio P3970 through the State of Texas Environmental Electronic Reporting System (STEERS), available at <https://www3.tceq.texas.gov/steers/>. Instructions for using STEERS are available on our web page at <https://www.tceq.texas.gov/assets/public/implementation/air/banking/guidance/steers.pdf>; however, if you require assistance, please contact Ms. Molly Ellsworth at 512-239-2296 or [molly.ellsworth@tceq.texas.gov](mailto:molly.ellsworth@tceq.texas.gov).

Thank you again for your quick attention to this issue and for your patience with me while this was getting resolved!

Best Regards,

## Melissa Ruano

Emissions Banking and Trading Program Work Leader  
Texas Commission on Environmental Quality  
Air Quality Division, MC 206  
PO Box 13087  
Austin, TX 78711-3087

Phone: (512) 239-4496

Email: [Melissa.Ruano@tceq.texas.gov](mailto:Melissa.Ruano@tceq.texas.gov)

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**From:** Ashish Jain <Ashish.Jain@ipaper.com>

**Sent:** Friday, May 24, 2019 7:50 AM

**To:** Melissa Ruano <melissa.ruano@tceq.texas.gov>

**Subject:** RE: Response Required by 5/17/2019 - Notice of Intent to Use Discrete Emission Credits, RN100214428

No need to apologize Melissa. It really does not matter when it gets approved. The start date requested is in July and my application is in. What really matters is you helped me a lot to get this current and in line as we all want.

**From:** Melissa Ruano <[melissa.ruano@tceq.texas.gov](mailto:melissa.ruano@tceq.texas.gov)>  
**Sent:** Thursday, May 23, 2019 5:29 PM  
**To:** Ashish Jain <[Ashish.Jain@ipaper.com](mailto:Ashish.Jain@ipaper.com)>  
**Subject:** [External] : RE: Response Required by 5/17/2019 - Notice of Intent to Use Discrete Emission Credits, RN100214428

Good Afternoon Ashish,

I wanted to send you a quick email regarding the status of the new portfolio for International Paper Co – Orange Mill that we discussed earlier this week. Unfortunately, I was unable to complete the creation of the new portfolio and I will be out of the office tomorrow, returning on Tuesday May 28. I should be able to complete the transfer when I return on Tuesday.

I apologize for the delay. Thank you for your understanding. I will contact you next week with the update.

Sincerely,

**Melissa Ruano**

Emissions Banking and Trading Program Work Leader  
Texas Commission on Environmental Quality  
Air Quality Division, MC 206  
PO Box 13087  
Austin, TX 78711-3087

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**From:** Ashish Jain <[Ashish.Jain@ipaper.com](mailto:Ashish.Jain@ipaper.com)>  
**Sent:** Wednesday, May 22, 2019 7:17 AM  
**To:** Melissa Ruano <[melissa.ruano@tceq.texas.gov](mailto:melissa.ruano@tceq.texas.gov)>  
**Subject:** RE: Response Required by 5/17/2019 - Notice of Intent to Use Discrete Emission Credits, RN100214428

I have general questions on Banking process and timing. If you don't mind, can we speak for few minutes sometime today or tomorrow?

**From:** Melissa Ruano <[melissa.ruano@tceq.texas.gov](mailto:melissa.ruano@tceq.texas.gov)>  
**Sent:** Tuesday, May 21, 2019 2:21 PM  
**To:** Ashish Jain <[Ashish.Jain@ipaper.com](mailto:Ashish.Jain@ipaper.com)>  
**Cc:** Lindley Anderson <[lindley.anderson@tceq.texas.gov](mailto:lindley.anderson@tceq.texas.gov)>; Frank Fraccastoro <[Frank.Fraccastoro@ipaper.com](mailto:Frank.Fraccastoro@ipaper.com)>  
**Subject:** [External] : RE: Response Required by 5/17/2019 - Notice of Intent to Use Discrete Emission Credits, RN100214428

Hi Ashish,

Thank you for your email. Yes, the documents that I requested have arrived. Either myself or the assigned project manager will contact you if we have any additional questions.

Thank you for your quick attention and response!

Sincerely,

**Melissa Ruano**

Emissions Banking and Trading Program Work Leader  
Texas Commission on Environmental Quality  
Air Quality Division, MC 206  
PO Box 13087  
Austin, TX 78711-3087

Phone: (512) 239-4496

Email: [Melissa.Ruano@tceq.texas.gov](mailto:Melissa.Ruano@tceq.texas.gov)

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**From:** Ashish Jain <[Ashish.Jain@ipaper.com](mailto:Ashish.Jain@ipaper.com)>

**Sent:** Tuesday, May 21, 2019 1:12 PM

**To:** Melissa Ruano <[melissa.ruano@tceq.texas.gov](mailto:melissa.ruano@tceq.texas.gov)>

**Cc:** Lindley Anderson <[lindley.anderson@tceq.texas.gov](mailto:lindley.anderson@tceq.texas.gov)>; Frank Fraccastoro <[Frank.Fraccastoro@ipaper.com](mailto:Frank.Fraccastoro@ipaper.com)>

**Subject:** RE: Response Required by 5/17/2019 - Notice of Intent to Use Discrete Emission Credits, RN100214428

Hello Melissa,

I submitted the two items as requested in your email below to your attention. You may have received it yesterday. I am attaching the documents with this email. Please let me know, if you have any more question. Thanks for your help in advance.

Regards,

**AJ**

Ashish Jain, CSP, CHMM, EIT  
Environmental Engineer – Air Compliance

**INTERNATIONAL  PAPER**

1750 IP Way, Orange, TX 77632

Ph - 409.746.7401

Cell – 409.571.3233

**From:** Melissa Ruano <[melissa.ruano@tceq.texas.gov](mailto:melissa.ruano@tceq.texas.gov)>

**Sent:** Wednesday, May 15, 2019 12:24 PM

**To:** Ashish Jain <[Ashish.Jain@ipaper.com](mailto:Ashish.Jain@ipaper.com)>

**Cc:** Lindley Anderson <[lindley.anderson@tceq.texas.gov](mailto:lindley.anderson@tceq.texas.gov)>; Frank Fraccastoro <[Frank.Fraccastoro@ipaper.com](mailto:Frank.Fraccastoro@ipaper.com)>

**Subject:** [External] : RE: Response Required by 5/17/2019 - Notice of Intent to Use Discrete Emission Credits, RN100214428



Hi Ashish,

Thank you again for your response. In order to move forward with your request, I will require the following:

1. A revised Notice of Intent to Use Discrete Emission Credits application with the amended Use Period dates (Start and End Dates). You can submit the revised copy to me via email.
2. Documentation/letter on company letterhead confirming that the DERCs that are deposited in the TIN Inc. account (EBT portfolio P1854) were included as part of the "assets" that are referenced in the change of ownership documentation that you sent to me on 5/13/2019. The documentation does not specify that the assets transferred to International Paper Company when TIN LLC was dissolved include the DERCs. Please have this document signed by the site's Authorized Account Representative (AAR). This individual needs to be either the site's Responsible Official (RO) or person designated by the RO to sign (certify) legal agreements for the company. The AAR cannot be a consultant.

Once I have this information from you, I will complete the transfer of ownership of RN100214428 from TIN Inc. to the International Paper Company. You will receive a portfolio (account) number for International and the AAR will be required to register themselves to the account. I will provide instruction on how to complete this registration once the new portfolio is issued.

Please provide the information above by **Friday May 24<sup>th</sup>** or contact me by this date to request an extension.

Thank you ,

Sincerely,

**Melissa Ruano**

Emissions Banking and Trading Program Work Leader  
Texas Commission on Environmental Quality  
Air Quality Division, MC 206  
PO Box 13087  
Austin, TX 78711-3087

Phone: (512) 239-4496

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**From:** Ashish Jain <[Ashish.Jain@ipaper.com](mailto:Ashish.Jain@ipaper.com)>

**Sent:** Monday, May 13, 2019 9:15 AM

**To:** Melissa Ruano <[melissa.ruano@tceq.texas.gov](mailto:melissa.ruano@tceq.texas.gov)>

**Cc:** Lindley Anderson <[lindley.anderson@tceq.texas.gov](mailto:lindley.anderson@tceq.texas.gov)>; Frank Fraccastoro <[Frank.Fraccastoro@ipaper.com](mailto:Frank.Fraccastoro@ipaper.com)>

**Subject:** RE: Response Required by 5/17/2019 - Notice of Intent to Use Discrete Emission Credits, RN100214428

Dear Ms. Ruano,

Thanks for speaking with me on Friday. I am attaching ownership transfer package that was submitted to TCEQ. Also part of this package is Attorney-Client Privilege Document that states that TIN LLC (aka Temple-Inland LLC) was an owner of IPG Assets and leased to International Paper Co (IPCO). TIN LLC is now dissolved and all the assets are transferred to IPCO. I believe this attached document will address items 1 & 2 in your email below.

Also – I want to request to amend Notice of Intent to Use to start date of July 1<sup>st</sup>, 2019. Please let me know, if this would suffice as an amendment to the submitted application. Or anything more is needed.

Thanks for your time and efforts on this project. We really appreciate your considerations in resolving this matter.

Regards,

**AJ**

Ashish Jain, CSP, CHMM, EIT  
Environmental Engineer – Air Compliance

**INTERNATIONAL  PAPER**

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Ph - 409.746.7401  
Cell – 409.571.3233

**From:** Melissa Ruano <[melissa.ruano@tceq.texas.gov](mailto:melissa.ruano@tceq.texas.gov)>

**Sent:** Friday, May 10, 2019 4:01 PM

**To:** Ashish Jain <[Ashish.Jain@ipaper.com](mailto:Ashish.Jain@ipaper.com)>

**Cc:** Lindley Anderson <[lindley.anderson@tceq.texas.gov](mailto:lindley.anderson@tceq.texas.gov)>

**Subject:** [External] : Response Required by 5/17/2019 - Notice of Intent to Use Discrete Emission Credits, RN100214428

Dear Ashish Jain,

This message regards a Notice of Intent to Use Discrete Emission Credits (Form DEC-2) that was submitted to the TCEQ on May 8, 2019.

As discussed, the following issues were identified during preliminary review of this application.

1. Our records show that the site, regulated entity RN100214428, is owned/operated by Tin Inc, CN602892788. The application that we received is from the International Paper Company - Orange Mill, CN601047830. In addition, this is the first application that has been submitted to the Emissions Banking and Trading Programs for this site since November 2012. Please confirm if a change of ownership has occurred for this site. Please provide details for the date that the change of ownership became effective.
2. The certificate that you intend to use, D2915, is owned by Tin Inc. CN602892788, portfolio (account) P1854. In order to transfer the credits, an electronic trade application will need to be submitted by Tin Inc., through our State of Texas Electronic Environmental Reporting System (STEERS), available at <https://www3.tceq.texas.gov/steers/>. In accordance with 30 Texas Administrative Code 101.376(a)(1), the user shall have ownership of a sufficient amount of credits before the use period for which the credits are to be used.
3. The use period provided in your application started on 05/07/2019. Your application was submitted on 05/08/2019, so it is past the intent to use start date. In accordance with 30 TAC 101.376(d)(1)(B)(iv), the Notice of Intent to Use application must be submitted at least 45 days before the first day of the use period. For these reasons, we cannot approve 05/07/2019 as

the start date for your application. Please amend your use period. Note that DERs cannot be used before the application has been approved by TCEQ.

Please respond to the items above by **Friday March 17** or request an extension by this date.

Feel free to contact me if you have any questions.

Sincerely,

**Melissa Ruano**

Emissions Banking and Trading Program Work Leader  
Texas Commission on Environmental Quality  
Air Quality Division, MC 206  
PO Box 13087  
Austin, TX 78711-3087

Phone: (512) 239-4496

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## Melissa Ruano

---

**From:** Melissa Ruano  
**Sent:** Monday, May 13, 2019 12:04 PM  
**To:** Amy Browning  
**Subject:** FW: Response Required by 5/17/2019 - Notice of Intent to Use Discrete Emission Credits, RN100214428  
**Attachments:** Air Permits 01.25.18.pdf

Good Morning Amy,

We received a Notice of Intent to Use Discrete Emission Credits from International Paper Co. (CN602892788) last Friday. The company is asking to use 1.0 ton of NOX DERCs from certificate number D2915 for compliance with 30 TAC 117.110(a)(1) at the Orange Linerboard Mill site (RN100214428).

According to our records, the site is owned by Tin Inc. (CN602892788). The certificate, D2915, is deposited in Tin Inc's portfolio, P1854. According to International, Tin Inc. was a wholly owned subsidiary of theirs; however, as of January 1, 2018, International became both owner and operator of the site. A change of ownership form and core data form were sent to APD and Central Registry, respectively. TIN, LLC has been dissolved and all assets were transferred to International (see attachments).

In a case like this, we normally require the old company to submit an EBT transfer application through STEERS to move credits from the old owner to the new. The application must be submitted by the old owner's AAR. My question is, if a company is dissolved without transferring their credits/allowances to the new owner (by submitted an EBT transfer form), is documentation showing that the assets have been transferred sufficient in lieu of the EBT form? Would the attached documentation hold up?

Please let me know your thoughts.

Thanks!  
Melissa Ruano x4496

**From:** Ashish Jain <Ashish.Jain@ipaper.com>  
**Sent:** Monday, May 13, 2019 9:15 AM  
**To:** Melissa Ruano <melissa.ruano@tceq.texas.gov>  
**Cc:** Lindley Anderson <lindley.anderson@tceq.texas.gov>; Frank Fraccastoro <Frank.Fraccastoro@ipaper.com>  
**Subject:** RE: Response Required by 5/17/2019 - Notice of Intent to Use Discrete Emission Credits, RN100214428

Dear Ms. Ruano,

Thanks for speaking with me on Friday. I am attaching ownership transfer package that was submitted to TCEQ. Also part of this package is Attorney-Client Privilege Document that states that TIN LLC (aka Temple-Inland LLC) was an owner of IPG Assets and leased to International Paper Co (IPCO). TIN LLC is now dissolved and all the assets are transferred to IPCO. I believe this attached document will address items 1 & 2 in your email below.

Also – I want to request to amend Notice of Intent to Use to start date of July 1<sup>st</sup>, 2019. Please let me know, if this would suffice as an amendment to the submitted application. Or anything more is needed.

Thanks for your time and efforts on this project. We really appreciate your considerations in resolving this matter.

Regards,

AJ

Ashish Jain, CSP, CHMM, EIT  
Environmental Engineer – Air Compliance

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**From:** Melissa Ruano <[melissa.ruano@tceq.texas.gov](mailto:melissa.ruano@tceq.texas.gov)>

**Sent:** Friday, May 10, 2019 4:01 PM

**To:** Ashish Jain <[Ashish.Jain@ipaper.com](mailto:Ashish.Jain@ipaper.com)>

**Cc:** Lindley Anderson <[lindley.anderson@tceq.texas.gov](mailto:lindley.anderson@tceq.texas.gov)>

**Subject:** [External] : Response Required by 5/17/2019 - Notice of Intent to Use Discrete Emission Credits, RN100214428

Dear Ashish Jain,

This message regards a Notice of Intent to Use Discrete Emission Credits (Form DEC-2) that was submitted to the TCEQ on May 8, 2019.

As discussed, the following issues were identified during preliminary review of this application.

1. Our records show that the site, regulated entity RN100214428, is owned/operated by Tin Inc, CN602892788. The application that we received is from the International Paper Company - Orange Mill, CN601047830. In addition, this is the first application that has been submitted to the Emissions Banking and Trading Programs for this site since November 2012. Please confirm if a change of ownership has occurred for this site. Please provide details for the date that the change of ownership became effective.
2. The certificate that you intend to use, D2915, is owned by Tin Inc. CN602892788, portfolio (account) P1854. In order to transfer the credits, an electronic trade application will need to be submitted by Tin Inc., through our State of Texas Electronic Environmental Reporting System (STEERS), available at <https://www3.tceq.texas.gov/steers/>. In accordance with 30 Texas Administrative Code 101.376(a)(1), the user shall have ownership of a sufficient amount of credits before the use period for which the credits are to be used.
3. The use period provided in your application started on 05/07/2019. Your application was submitted on 05/08/2019, so it is past the intent to use start date. In accordance with 30 TAC 101.376(d)(1)(B)(iv), the Notice of Intent to Use application must be submitted at least 45 days before the first day of the use period. For these reasons, we cannot approve 05/07/2019 as the start date for your application. Please amend your use period. Note that DERCs cannot be used before the application has been approved by TCEQ.

Please respond to the items above by **Friday March 17** or request an extension by this date.

Feel free to contact me if you have any questions.

Sincerely,

**Melissa Ruano**

Emissions Banking and Trading Program Work Leader