

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



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

June 23, 2025

MR ERNESTO J REYES  
ENVIRONMENTAL HEALTH SAFETY SUPERVISOR  
TPCO AMERICA CORPORATION  
PO BOX C  
GREGORY TX 78359-1003

Re: Federal Operating Permit Renewal  
Permit Number: 3660  
Company Name: TPCO America Corporation  
Customer Reference Number: CN603957036  
Regulated Entity Number: RN106224447

Dear Mr. Reyes:

The renewal of the above-referenced site operating permit (SOP) is required every 5 years, as indicated in Title 30 Texas Administrative Code § 122.241(a) [30 TAC § 122.241(a)] or, more frequently if so indicated on the permit face. Accordingly, permit holders are required to submit *timely and complete* permit renewal applications as specified in 30 TAC § 122.241(b). Title 30 TAC § 122.134(a) indicates that an application is *complete* on the 61st day after receipt by the executive director, unless the executive director has requested additional information or otherwise notified the applicant of incompleteness. For an application to be *timely*, 30 TAC § 122.133(2) indicates that its submittal must occur between 6 and 18 months before the permit's expiration date. Our receipt of a timely and complete application allows you to operate under your SOP's current terms and conditions until final action is taken on your renewal application. Please disregard this notification letter if a renewal application has been submitted and is currently being processed.

The expiration of your permit is June 2, 2026; and any *complete* application received before December 2, 2025, will be considered timely. If your SOP expires without the submittal of a timely and complete renewal application, your right to operate the above-referenced facility will be terminated. The reinstatement of your right to operate will require your submittal, and our final approval, of a new and separate SOP application.)

A complete application for renewal must include all of the information required by 30 TAC Chapter 122 (see 30 TAC § 122.132). To comply with these requirements, please provide new versions of the following forms: Form OP-1 (Site Information Summary), Form OP-2 (Applications for Permit Revision/Renewal), Form OP-ACPS (Application Compliance Plan and Schedule), Form OP-REQ1 (Application Area-Wide Applicability Determinations and General Information), and Form OP-CRO1 (Certification by Responsible Official). In addition, please review all other forms that were previously submitted and provide any updated information necessary for processing of the SOP renewal (i.e. appropriate Unit Attribute forms, OP-REQ2, OP-REQ3, OP-MON, etc. Note that even though nothing may have changed at the site, updated Unit Attribute forms are required to be submitted if the most recent version of the TCEQ Unit Attribute form includes additional applicable questions or revised applicable option codes for any answer.). Title V permit holders with major New Source Review (NSR) permits must include in the Title V renewal application a Major NSR Summary Table. The Major NSR Summary Table must also be submitted electronically upon request. **Failure to submit all of the required forms may result in a determination that your renewal application is not complete.** If any of your company's

Mr. Ernesto J. Reyes

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core data (i.e., name, address, phone number, etc.) has changed, a TCEQ Core Data form will be required with these submittals. All forms may be found at the TCEQ Web page at [http://www.tceq.texas.gov/permitting/air/nav/tv\\_admin\\_forms.html](http://www.tceq.texas.gov/permitting/air/nav/tv_admin_forms.html).

As a reminder, you may void your SOP if you demonstrate that the permitted site is no longer subject to the Federal Operating Permits Program. If you wish to pursue avoidance of your SOP, please notify us in writing to this effect and provide the supporting documentation required by 30 TAC § 122.161(e)(1).

Any application submitted by a person/entity who is delinquent on a fee and/or penalty will not be declared administratively complete until the fees/penalties are paid and/or current. Similarly, final action will be withheld by the agency on an application if it is discovered after the application is considered administratively complete that the owner/entity who submitted the application is delinquent on fees and/or penalties until such time as the fees/penalties are paid and/or current. You may visit the agency Web site for additional information at <http://www.tceq.texas.gov/agency/delin/index.html>.

Further information regarding the renewal process and required submissions may be accessed at [http://www.tceq.texas.gov/permitting/air/guidance/titlev/tv\\_site\\_guidance.html](http://www.tceq.texas.gov/permitting/air/guidance/titlev/tv_site_guidance.html). Please disregard this notice if you have already submitted the above-referenced renewal application. Thank you for your cooperation in this matter. If you have questions concerning the processing of your SOP renewal application, please contact Mr. Jesse Chacon at (512) 239-1570.

Sincerely,

A handwritten signature in black ink that reads "Nancy Birdsong". The signature is written in a cursive, flowing style.

Nancy Birdsong, Team Leader  
Air Permits Initial Review Team  
Air Permits Division  
Texas Commission on Environmental Quality

cc: Air Section Manager, Region 14 - Corpus Christi

**To:** ernestr@tpcoamerica.com  
**Cc:** joadrianv@tpcoamerica.com; bairz@tpcoamerica.com;  
ahansborough@trinityconsultants.com; R14APDmail@tceq.texas.gov; APIRT  
**Subject:** Renewal Notification for Permit O3660 – Please Verify Receipt  
**Attachments:** 1-SOP12(3660)-6500R.pdf

Mr. Reyes,

The attached renewal notification letter contains information of the upcoming deadline to apply for renewal. **Please reply to this email to confirm receipt of the renewal notification letter. A reply confirmation will improve efficiency and prevent a hard copy of the letter from having to be sent by certified mail.**

Should you have any questions, please call 512-239-1250 and ask for a member of the Air Permits Initial Review Team (APIRT) or via email at [apirt@tceq.texas.gov](mailto:apirt@tceq.texas.gov).

Thank you!

TCEQ ID: 6500R

**From:** Ernest Reyes <Ernestr@tpcoamerica.com>  
**Sent:** Monday, June 23, 2025 12:53 PM  
**To:** Karleigh Villanueva; Ramirez, Gabriel; Johnson, Colleen; Greene, Jon  
**Subject:** Re: Renewal Notification for Permit O3660 – Please Verify Receipt

Dear Ms. Villanueva,

I would like to bring to your attention that my first name is misspelled in your records; it should be "Ernest" without the "O."

I am working with our consultant to gather all the necessary information for the permit renewal. During the January 2025 audit, several changes were submitted concerning our EPNs, chemical inventory lists, and day-to-day operations. However, the TCEQ website does not reflect these updates, and I have not received an updated copy of the Permit since the final changes were made. We made so many changes in a short amount of time it was kind of hard to keep up with everything during the review. I would appreciate it if I could get a copy along with the corrected letter.

Also, please remove these individuals from future correspondence as well, ([joadrianv@tpcoamerica.com](mailto:joadrianv@tpcoamerica.com), [ahansborough@trinityconsultants.com](mailto:ahansborough@trinityconsultants.com)) We no longer use Trinity Consulting and Jo Adrain is no longer employed by TEDA TPCO. I will forward a copy of this message to Civil & Environmental Consultants, Inc.; they currently assist us with other permits. Terms were drawn up between CEC and TEDA TPCO in Oct. 2022 by Jo Adrian before I was brought on.

Please feel free to contact me via email or phone if you have any additional questions.

Respectfully,

**Ernest Reyes**  
**Environmental Health & Safety Supervisor**  
**TEDA TPCO America Corporation**

(361) 271-1478 work

(361) 910-3381 cell (new contact)

Physical Address: 5431 Highway 35, Gregory, Texas 78359

Mailing Address: PO Box C, Gregory, Texas 78359

Email : [ernestr@tpcoamerica.com](mailto:ernestr@tpcoamerica.com)



On Mon, Jun 23, 2025 at 10:57 AM Karleigh Villanueva  
<[Karleigh.Villanueva@tceq.texas.gov](mailto:Karleigh.Villanueva@tceq.texas.gov)> wrote:

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Thank you!

TCEQ ID: 6500R

Run ID: 229