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BAY AREA AIR QUALITY  
MANAGEMENT DISTRICT



**GRAPHIC PACKAGING**  
INTERNATIONAL, INC.

Graphic Packaging International, Inc.  
2600 De La Cruz Blvd  
Santa Clara, CA, 95050

February 22, 2011

Director of Compliance and Enforcement  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, CA 94109  
Attn: Title V Reports

**Subject:**

Title V Monitoring Report for the Period: August 1, 2011, to January 31, 2012

**Reference:**

Graphic Packaging International Santa Clara Paper Mill, Plant #AO732  
2600 De La Cruz Blvd., Santa Clara, California

Dear Director:

This Title V Monitoring Report is submitted by **Graphic Packaging International, Inc.**, as required to comply with the reporting requirements in **District Regulation 2-6-502** and **Title V permit condition I-F**. During this period, **Graphic Packaging International** has complied with all applicable requirements for the all sources, with exception to one isolated inoperative monitor incident on January 1-3, 2012, when a **NO<sub>x</sub> CEM** breakdown occurred due to plugging in the exhaust line. **Graphic Packaging International** has petitioned the **Bay Area Air Quality Management District** for breakdown relief for this unforeseen inoperative monitor incident.

During this period no fuel oil was combusted in the **back-up boiler**, which operated at an annual capacity factor of less than 5% over the last 12 months. The gas turbine and duct burners operated at below their combined maximum firing rate of 289.2 MMBtu/hour.



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We have appended monthly CEMS NO<sub>x</sub> Reports, Boiler Hours and Fuel Usage Summary Report, and Tons Paperboard Production for this period. If you have any additional questions regarding this report or any events during this period, please call Rick Home at (408) 496 5080.

I certify that based on the information and belief formed after reasonable inquiry, the statements and information contained in this Title V Monitoring Report are true, accurate, and complete. I certify that I am the responsible official as defined in District Regulation 2-6.

Sincerely,

Richard M. Johnston  
Resident Manager & Responsible Official

Attachment:

CEMS NO<sub>x</sub> Data, August, 2011, through January, 2012  
Cogen Hour and Fuel Usage Summary, August, 2011, through January, 2012  
Tons Paperboard Production, August, 2011, through January, 2012

Copies:

William Buchan, Market Potential, Inc.

**MONTHLY CEMS REPORT  
MONTH OF AUGUST 2011**

Enclosed is the monthly NOx report for the month of August 2011. There was 1 shutdown or start up for the month. The maximum 4 hour average was less than 66.6 PPMv NOx. CEMS were in operation for more than 75% of the days for the month.

DATE	MAXIMUM 9 HR. AVERAGE STACK CORRECTED NOX PPM	FUEL CONSUMPTION MCF / DAY	NOX POUNDS / DAY
08/01/2011	14.00	5245	270
08/02/2011	13.99	5217	268
08/03/2011	14.14	5208	269
08/04/2011	14.00	5308	273
08/05/2011	14.01	5230	269
08/06/2011	14.17	5311	276
08/07/2011	14.18	6257	274
08/08/2011	14.15	5198	269
08/09/2011	13.98	5265	271
08/10/2011	14.02	5262	271
08/11/2011	14.01	5240	270
08/12/2011	13.99	5308	273
08/13/2011	14.05	5177	267
08/14/2011	14.14	4350	225
08/15/2011	13.99	0	0
08/16/2011	0.00	0	0
08/17/2011	0.00	0	0
08/18/2011	0.00	0	0
08/19/2011	14.03	3606	184
08/20/2011	14.01	5263	271
08/21/2011	13.99	5317	273
08/22/2011	14.04	5166	265
08/23/2011	14.06	5125	263
08/24/2011	14.03	5058	261
08/25/2011	14.02	5207	268
08/26/2011	14.00	5179	267
08/27/2011	14.00	5167	266
08/28/2011	14.01	5246	270
08/29/2011	14.01	5187	267
08/30/2011	14.03	5122	263
08/31/2011	14.00	5342	275



**MONTHLY CEMS REPORT  
MONTH OF SEPTEMBER 2011**

Enclosed is the monthly NOx report for the month of September 2011. There was 2 shutdowns or start ups for the month. The maximum 4 hour average was less than 108.3 PPMv NOx. CEMS were in operation for more than 75% of the days for the month.

DATE	MAXIMUM 3 HR. AVERAGE STACK CORRECTED NOX	FUEL CONSUMPTION	NOX
	PPM	MCF / DAY	POUNDS / DAY
09/01/2011	13.99	5157	264
09/02/2011	14.01	5141	264
09/03/2011	13.99	5174	265
09/04/2011	14.00	5193	267
09/05/2011	14.01	5189	266
09/06/2011	13.98	5236	269
09/07/2011	14.02	5199	267
09/08/2011	14.09	4533	232
09/09/2011	16.85*	5073	266
09/10/2011	14.02	5168	266
09/11/2011	13.99	5195	267
09/12/2011	14.02	5207	268
09/13/2011	13.98	5106	262
09/14/2011	14.01	5280	271
09/15/2011	13.99	5253	270
09/16/2011	14.01	5165	265
09/17/2011	14.01	4911	251
09/18/2011	14.06	4895	252
09/19/2011	13.99	5030	257
09/20/2011	13.99	4968	254
09/21/2011	13.99	4991	256
09/22/2011	13.99	4990	255
09/23/2011	13.98	4984	255
09/24/2011	14.01	4959	254
09/25/2011	13.99	4483	229
09/26/2011	13.95	0	0
09/27/2011	0.00	0	0
09/28/2011	0.00	0	0
09/29/2011	0.00	0	0
09/30/2011	13.80	3078	158

\* In compliance as we are under the Regulation 9-9 criteria of 0.7 lbs NOx/MW



**MONTHLY CEMS REPORT**  
**MONTH OF OCTOBER 2011**

Enclosed is the monthly NOx report for the month of October 2011. There were no shutdowns or start ups for the month. The maximum 4 hour average was less than 15.0 PPMv NOx. CEMS were in operation for more than 75% of the days for the month.

DATE	MAXIMUM 3 HR. AVERAGE STACK CORRECTED NOX PPM	FUEL CONSUMPTION MCF / DAY	NOX POUNDS / DAY
10/01/2011	14.01	5226	269
10/02/2011	14.01	5280	271
10/03/2011	14.00	5079	261
10/04/2011	14.25	5278	271
10/05/2011	14.03	5249	271
10/06/2011	14.23	5338	275
10/07/2011	14.20	5363	276
10/08/2011	13.96	5299	273
10/09/2011	14.05	5221	268
10/10/2011	13.96	5202	268
10/11/2011	13.96	5089	262
10/12/2011	14.02	5317	274
10/13/2011	14.08	5244	270
10/14/2011	14.38	5172	267
10/15/2011	14.10	5350	276
10/16/2011	13.98	5368	277
10/17/2011	14.00	5263	271
10/18/2011	14.03	5278	271
10/19/2011	14.14	5090	262
10/20/2011	13.99	5231	270
10/21/2011	14.23	5312	273
10/22/2011	14.02	5266	272
10/23/2011	14.00	5311	273
10/24/2011	14.17	5274	272
10/25/2011	14.44	5266	272
10/26/2011	14.98	5277	274
10/27/2011	14.69	5186	276
10/28/2011	14.25	5308	278
10/29/2011	14.36	5368	278
10/30/2011	14.29	5273	274
10/31/2011	14.01	5310	275



**MONTHLY CEMS REPORT  
MONTH OF NOVEMBER 2011**

Enclosed is the monthly NOx report for the month of November 2011. There were no shutdowns or start ups for the month. The maximum 4 hour average was less than 15.0 PPMv NOx. CEMS were in operation for more than 75% of the days for the month.

DATE	MAXIMUM 3 HR. AVERAGE STACK CORRECTED NOX PPM	FUEL CONSUMPTION MCF / DAY	NOX POUNDS / DAY
11/01/2011	15.31*	5291	281
11/02/2011	14.68	5293	278
11/03/2011	14.20	5223	272
11/04/2011	14.58	5316	276
11/05/2011	14.52	5595	291
11/06/2011	14.07	5222	269
11/07/2011	14.38	5402	281
11/08/2011	14.39	5195	269
11/09/2011	14.53	5366	279
11/10/2011	14.48	5303	277
11/11/2011	14.28	5253	272
11/12/2011	14.01	5228	268
11/13/2011	14.03	5285	272
11/14/2011	14.19	5363	277
11/15/2011	14.02	5273	271
11/16/2011	14.08	5410	279
11/17/2011	14.00	5252	270
11/18/2011	13.99	5285	272
11/19/2011	14.22	5254	272
11/20/2011	14.00	5244	270
11/21/2011	14.37	5268	276
11/22/2011	14.10	5219	269
11/23/2011	13.99	5259	270
11/24/2011	14.05	5238	269
11/25/2011	14.00	5338	274
11/26/2011	14.11	5316	274
11/27/2011	14.00	5301	273
11/28/2011	14.01	5312	273
11/29/2011	14.14	5263	271
11/30/2011	14.52	5241	274

\* In compliance as we are under the Regulation 9-9 criteria of 0.7 lbs NOx/MW



**MONTHLY CEMS REPORT  
MONTH OF DECEMBER 2011**

Enclosed is the monthly NOx report for the month of December 2011. There were no shutdowns or start ups for the month. The maximum 4 hour average was less than 15.3 PPMv NOx. CEMS were in operation for more than 75% of the days for the month.

DATE	MAXIMUM 3 HR. AVERAGE STACK CORRECTED NOX PPM	FUEL CONSUMPTION MCF / DAY	NOX POUNDS / DAY
12/01/2011	15.32*	5189	270
12/02/2011	14.90	5288	274
12/03/2011	14.66	5051	261
12/04/2011	14.67	5208	268
12/05/2011	14.28	5201	267
12/06/2011	14.09	5047	260
12/07/2011	14.05	5294	272
12/08/2011	14.16	5223	269
12/09/2011	14.41	5209	268
12/10/2011	14.33	5281	272
12/11/2011	13.98	5183	267
12/12/2011	13.99	5252	270
12/13/2011	14.52	5276	272
12/14/2011	14.13	5172	266
12/15/2011	14.05	5209	268
12/16/2011	14.48	5282	271
12/17/2011	14.65	5184	267
12/18/2011	14.00	5177	266
12/19/2011	14.70	5261	271
12/20/2011	14.59	5239	270
12/21/2011	14.43	5046	260
12/22/2011	14.61	5161	265
12/23/2011	14.19	5237	269
12/24/2011	14.12	5113	263
12/25/2011	14.01	5196	267
12/26/2011	13.99	5276	271
12/27/2011	14.01	5192	267
12/28/2011	14.07	5242	270
12/29/2011	14.02	5287	273
12/30/2011	13.97	5148	266
12/31/2011	13.99	5139	265

\* In compliance as we are under the Regulation 9-9 criteria of 0.7 lbs NOx/MMW



**GRAPHIC PACKAGING**  
INTERNATIONAL, INC.

**MONTHLY CEMS REPORT**  
**MONTH OF JANUARY 2012**

Enclosed is the monthly NOx report for the month of January 2012. There was 1 shutdown or start up for the month. The maximum 4 hour average was less than 109.4 PPMv NOx. CEMS were in operation for more than 75% of the days for the month, despite one inoperative NOx monitor event which invalidated two days of CEMS operation.

DATE	MAXIMUM 3 HR. AVERAGE STACK CORRECTED NOX PPM	FUEL CONSUMPTION MGF / DAY	NOX POUNDS / DAY
01/01/2012	14.33	5240	271
01/02/2012	13.99	5341	272
01/03/2012	14.32	5107	263
01/04/2012	14.04	5127	264
01/05/2012	14.03	5276	272
01/06/2012	14.01	5227	269
01/07/2012	14.34	5084	263
01/08/2012	14.20	5126	265
01/09/2012	14.17	5109	263
01/10/2012	14.06	5181	267
01/11/2012	14.30	5210	269
01/12/2012	14.59	5158	268
01/13/2012	14.39	5139	268
01/14/2012	14.45	5168	268
01/15/2012	14.00	5150	265
01/16/2012	13.99	5177	266
01/17/2012	13.99	5112	263
01/18/2012	13.99	5168	265
01/19/2012	13.99	5133	264
01/20/2012	13.98	5216	268
01/21/2012	14.17	5129	265
01/22/2012	14.26	5146	269
01/23/2012	14.10	5087	262
01/24/2012	13.99	5156	265
01/25/2012	14.01	5190	267
01/26/2012	14.00	5197	268
01/27/2012	14.57	5076	268
01/28/2012	14.02	5096	262
01/29/2012	13.99	5084	262
01/30/2012	14.50	5148	267
01/31/2012	14.57	2671	139





Graphic Packaging International  
Santa Clara, CA

**BOILER HOURS & FUEL USAGE**

AUG 1, 2011 - JAN 31, 2012

<b>MONTH</b>	<b>OPERATING HOURS</b>	<b>NATURAL GAS (MCF)</b>
Aug-11	12.8	595
Sep	115.8	8,299
Oct	0.0	0
Nov	0.0	0
Dec	0.1	5
Jan-12	7.6	371

**Total Natural Gas Usage from Aug 1, 2011 to Jan 31, 2012: 9270 MCF**

**Total Operating Hours from Aug 1, 2011 to Jan 31, 2012: 136.3 hrs**

**No Liquid Fuel Oil Was Used.**

**GAS TURBINE/DUCT BURNER HRS & FUEL**

AUG 1, 2011 - JAN 31, 2012

<b>MONTH</b>	<b>OPERATING HOURS</b>	<b>NATURAL GAS (MCF)</b>
Aug-11	637.4	160,615
Sep	607.3	163,646
Oct	744.0	201,037
Nov	720.0	197,494
Dec	744.0	201,217
Jan-12	733.1	199,507

**Total Natural Gas Usage from Aug 1, 2011 to Jan 31, 2012: 1123516 MCF**

**Total Operating Hours from Aug 1, 2011 to Jan 31, 2012: 4185.8 hrs**

Graphic Packaging International, Inc  
Santa Clara, CA

**TONS PAPERBOARD PRODUCED**

AUG 1, 2011 - JAN 31, 2012

<u>MONTH</u>	<u>TONS</u>	<u>PREVIOUS 12 MONTHS (TONS)</u>
Aug-11	9,816	138,893
Sep	11,759	138,953
Oct	12,168	138,768
Nov	11,581	138,219
Dec	10,351	137,770
Jan-12	11,942	137,287