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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

January 8, 2018

Director of Compliance and Enforcement
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105
Attn: Title V Reports

TITLE V

Subject:
Title V Monitoring Report for the Period: July 1, 2017, to December 31, 2017

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 monitoring requirements for the all sources, without exception. 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, duct burners, and back-up boiler all operated at below their maximum firing rates. The rolling 12-month throughput rate for boxboard product remained below 142,000 tons per year.

Our facility was shut down in December 2017. This is the last Title V Monitoring Report for this facility. If you have any additional questions regarding this report or any events during this period, please call Rick Horne at (408) 496 5080.

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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,

Tony Hobson
VP, Resident Manager & Responsible Official

Attachment:
CEMS NO_x Data, July, 2017, through December, 2017

Copies:
William Buchan, Market Potential, Inc.

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MONTHLY CEMS REPORT

MONTH OF JANUARY 2017

Enclosed is the monthly NOx report for the month of January, 2017. There were 0 shutdown(s) / start up(s) for the month. The maximum 4 hour average was less than 14.6 PPMv NOx.

DATE	MAXIMUM 3 HR. AVERAGE STACK CORRECTED NOX PPM	FUEL CONSUMPTION MCF / DAY	NOX POUNDS / DAY
01/01/2017	14.52	5939	317
01/02/2017	14.51	6003	320
01/03/2017	14.51	5994	319
01/04/2017	14.51	6103	324
01/05/2017	14.52	6336	338
01/06/2017	14.52	6240	333
01/07/2017	14.49	6030	321
01/08/2017	14.52	5826	310
01/09/2017	14.53	5591	298
01/10/2017	14.52	5597	298
01/11/2017	14.54	5998	319
01/12/2017	14.52	5917	316
01/13/2017	14.52	6082	324
01/14/2017	14.52	5933	316
01/15/2017	14.52	6025	318
01/16/2017	14.51	6071	324
01/17/2017	14.51	6179	329
01/18/2017	14.50	5941	316
01/19/2017	14.51	6091	324
01/20/2017	14.56	6068	323
01/21/2017	14.52	5874	313
01/22/2017	14.52	5911	314
01/23/2017	14.51	5909	315
01/24/2017	14.52	6010	320
01/25/2017	14.51	6171	329
01/26/2017	14.52	6103	325
01/27/2017	14.52	6227	331
01/28/2017	14.51	6208	330
01/29/2017	14.51	5890	313
01/30/2017	14.51	5984	318
01/31/2017	14.51	6071	321

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MONTHLY CEMS REPORT

MONTH OF FEBRUARY 2017

Enclosed is the monthly NOx report for the month of February, 2017. There were 2 shutdown(s) / start up(s) for the month. The maximum 4 hour average was less than 69.2 PPMv NOx.

DATE	MAXIMUM 3 HR. AVERAGE STACK CORRECTED NOX PPM	FUEL CONSUMPTION MCF / DAY	NOX POUNDS / DAY
02/01/2017	14.51	6237	332
02/02/2017	14.50	5543	294
02/03/2017	14.52	5916	314
02/04/2017	14.51	5801	308
02/05/2017	14.51	5978	317
02/06/2017	14.51	5790	307
02/07/2017	14.51	5593	297
02/08/2017	14.51	5760	306
02/09/2017	14.51	5484	291
02/10/2017	14.51	5813	309
02/11/2017	14.52	5780	307
02/12/2017	14.51	5933	316
02/13/2017	14.51	5984	318
02/14/2017	14.51	5917	314
02/15/2017	14.44	475	25
02/16/2017	0.00	0	0
02/17/2017	0.00	0	0
02/18/2017	0.00	0	0
02/19/2017	14.32	1890	80
02/20/2017	14.52	5674	301
02/21/2017	14.52	4888	248
02/22/2017	14.51	6033	321
02/23/2017	14.50	5997	319
02/24/2017	14.52	6188	329
02/25/2017	14.51	6121	326
02/26/2017	14.51	6160	328
02/27/2017	14.63	6067	296
02/28/2017	14.83	6102	326

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MONTHLY CEMS REPORT

MONTH OF MARCH 2017

Enclosed is the monthly NOx report for the month of March, 2017. There were NO shutdown(s) / start up(s) for the month. The maximum 4 hour average was less than 14.8 PPMv NOx.

DATE	MAXIMUM 3 HR. AVERAGE STACK CORRECTED NOX PPM	FUEL CONSUMPTION MCF / DAY	NOX POUNDS / DAY
03/01/2017	14.52	6108	326
03/02/2017	14.55	6217	329
03/03/2017	14.51	6202	330
03/04/2017	14.49	6098	321
03/05/2017	14.51	6079	322
03/06/2017	14.52	6136	325
03/07/2017	14.51	6107	324
03/08/2017	14.81	6053	321
03/09/2017	14.59	5785	307
03/10/2017	14.51	5691	301
03/11/2017	14.52	5855	310
03/12/2017	14.52	5636	299
03/13/2017	14.51	5911	314
03/14/2017	14.50	5880	312
03/15/2017	14.53	5805	308
03/16/2017	14.54	5832	310
03/17/2017	14.51	5781	307
03/18/2017	14.51	5934	315
03/19/2017	14.52	5655	300
03/20/2017	14.51	5823	309
03/21/2017	14.50	5937	314
03/22/2017	14.53	6130	326
03/23/2017	14.51	5976	318
03/24/2017	14.50	5923	314
03/25/2017	14.51	6001	319
03/26/2017	14.52	6045	321
03/27/2017	14.53	6057	322
03/28/2017	14.51	6004	319
03/29/2017	14.50	5742	305
03/30/2017	14.55	5913	314
03/31/2017	14.52	5842	310

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MONTHLY CEMS REPORT

MONTH OF APRIL 2017

Enclosed is the monthly NOx report for the month of April, 2017. There was 1 shutdown(s) / start up(s) for the month. The maximum 4 hour average was less than 24.8 PPMv NOx. Cogeneration Plant was shut down for maintenance from 04/18 @ 04:00 until 05/06/2017.

DATE	MAXIMUM 3 HR. AVERAGE STACK CORRECTED NOX PPM	FUEL CONSUMPTION MCF / DAY	NOX POUNDS / DAY
04/01/2017	14.52	5751	305
04/02/2017	14.51	5724	303
04/03/2017	14.52	5718	303
04/04/2017	14.55	5756	306
04/05/2017	14.52	5917	314
04/06/2017	14.56	6020	320
04/07/2017	14.51	5869	311
04/08/2017	14.54	5860	311
04/09/2017	14.54	5906	313
04/10/2017	14.52	5761	305
04/11/2017	14.52	5629	298
04/12/2017	14.50	5478	290
04/13/2017	14.53	5739	304
04/14/2017	14.51	5797	307
04/15/2017	14.52	5767	306
04/16/2017	14.52	5802	307
04/17/2017	14.52	5725	300
04/18/2017	14.26	926	48
04/19/2017	0.00	0	0
04/20/2017	0.00	0	0
04/21/2017	0.00	0	0
04/22/2017	0.00	0	0
04/23/2017	0.00	0	0
04/24/2017	0.00	0	0
04/25/2017	0.00	0	0
04/26/2017	0.00	0	0
04/27/2017	0.00	0	0
04/28/2017	0.00	0	0
04/29/2017	0.00	0	0
04/30/2017	0.00	0	0

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MONTHLY CEMS REPORT

MONTH OF MAY 2017

Enclosed is the monthly NOx report for the month of May, 2017. There was 1 shutdown(s) / start up(s) for the month. The maximum 4 hour average was less than 112.2 PPMv NOx. Cogeneration Plant was shut down for maintenance from 04/18 @ 04:04 until 05/06/2017 @ 16:30.

DATE	MAXIMUM 3 HR. AVERAGE STACK CORRECTED NOX PPM	FUEL CONSUMPTION MCF / DAY	NOX POUNDS / DAY
05/01/2017	0.00	0	0
05/02/2017	0.00	0	0
05/03/2017	0.00	0	0
05/04/2017	0.00	0	0
05/05/2017	0.00	0	0
05/06/2017	13.72	1817	40
05/07/2017	14.51	6378	337
05/08/2017	14.52	6472	342
05/09/2017	14.55	6388	337
05/10/2017	14.51	6526	345
05/11/2017	14.52	6150	326
05/12/2017	14.51	6371	337
05/13/2017	14.53	6497	344
05/14/2017	14.52	6376	337
05/15/2017	14.51	6455	341
05/16/2017	14.53	6507	344
05/17/2017	14.52	6529	345
05/18/2017	14.53	6396	337
05/19/2017	14.48	6286	325
05/20/2017	14.48	6301	325
05/21/2017	14.52	6210	330
05/22/2017	14.53	5968	317
05/23/2017	14.52	5989	318
05/24/2017	14.51	6048	322
05/25/2017	14.53	5987	319
05/26/2017	14.51	6043	322
05/27/2017	14.52	6089	324
05/28/2017	14.51	6065	323
05/29/2017	14.50	6173	328
05/30/2017	14.51	6198	330
05/31/2017	14.51	5902	314

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MONTHLY CEMS REPORT

MONTH OF JUNE 2017

Enclosed is the monthly NOx report for the month of June, 2017. There were 2 shutdown(s) / start up(s) for the month. The maximum 4 hour average was less than 99.6 PPMv NOx.

DATE	MAXIMUM 3 HR. AVERAGE STACK CORRECTED NOX PPM	FUEL CONSUMPTION MCF / DAY	NOX POUNDS / DAY
06/01/2017	14.52	5696	303
06/02/2017	14.52	5767	307
06/03/2017	14.51	6044	321
06/04/2017	14.51	6004	319
06/05/2017	14.52	5798	309
06/06/2017	14.51	5902	314
06/07/2017	14.51	5823	310
06/08/2017	14.50	5806	309
06/09/2017	14.51	5770	308
06/10/2017	14.59	5744	307
06/11/2017	14.61	6071	324
06/12/2017	14.53	5998	320
06/13/2017	14.50	5950	317
06/14/2017	14.53	6019	321
06/15/2017	14.53	5967	318
06/16/2017	14.51	5859	310
06/17/2017	14.53	5834	310
06/18/2017	14.50	5302	282
06/19/2017	14.58	5433	289
06/20/2017	14.53	5860	311
06/21/2017	14.52	5820	309
06/22/2017	14.52	5693	303
06/23/2017	14.51	5847	311
06/24/2017	14.51	5809	309
06/25/2017	14.51	5893	313
06/26/2017	14.51	5877	313
06/27/2017	14.52	5941	316
06/28/2017	14.50	5709	304
06/29/2017	14.48	2120	293
06/30/2017	14.52	5706	304

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MONTHLY CEMS REPORT

MONTH OF JULY 2017

Enclosed is the monthly NOx report for the month of July, 2017. There was 1 shutdown(s) / start up(s) for the month. The maximum 4 hour average was less than 64.6 PPMv NOx.

DATE	MAXIMUM 3 HR. AVERAGE STACK CORRECTED NOX PPM	FUEL CONSUMPTION MCF / DAY	NOX POUNDS / DAY
07/01/2017	14.51	5906	314
07/02/2017	14.53	3274	174
07/03/2017	0.00	0	0
07/04/2017	14.52	1698	90
07/05/2017	14.50	5938	316
07/06/2017	14.52	5910	314
07/07/2017	14.52	5819	309
07/08/2017	14.51	5711	303
07/09/2017	14.52	5650	300
07/10/2017	14.52	5773	307
07/11/2017	14.53	5890	313
07/12/2017	14.55	6047	321
07/13/2017	14.51	5960	317
07/14/2017	14.52	6003	319
07/15/2017	14.52	5962	316
07/16/2017	14.51	5858	311
07/17/2017	14.52	5826	309
07/18/2017	14.51	6335	336
07/19/2017	14.52	5997	318
07/20/2017	14.50	5696	302
07/21/2017	14.51	5906	313
07/22/2017	14.53	5924	314
07/23/2017	14.51	5779	306
07/24/2017	14.52	5927	300
07/25/2017	14.51	5975	317
07/26/2017	14.51	5728	304
07/27/2017	14.53	5550	295
07/28/2017	14.52	5572	296
07/29/2017	14.50	5798	308
07/30/2017	14.51	5966	316
07/31/2017	14.51	5844	310

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MONTHLY CEMS REPORT

MONTH OF AUGUST 2017

Enclosed is the monthly NOx report for the month of August, 2017. There was 1 shutdown(s) / start up(s) for the month. The maximum 4 hour average was less than 71.7 PPMv NOx.

DATE	MAXIMUM 3 HR. AVERAGE STACK CORRECTED NOX PPM	FUEL CONSUMPTION MCF / DAY	NOX POUNDS / DAY
08/01/2017	14.51	5810	308
08/02/2017	14.51	5678	301
08/03/2017	14.52	5799	307
08/04/2017	14.51	5808	308
08/05/2017	14.52	5752	305
08/06/2017	14.51	5819	309
08/07/2017	14.52	5876	311
08/08/2017	14.51	5887	312
08/09/2017	14.52	5847	310
08/10/2017	14.51	5829	309
08/11/2017	14.52	5822	308
08/12/2017	14.52	5802	307
08/13/2017	14.51	5892	312
08/14/2017	14.57	454	24
08/15/2017	0.00	0	0
08/16/2017	0.00	0	0
08/17/2017	14.52	2485	129
08/18/2017	14.52	5798	307
08/19/2017	14.51	5939	315
08/20/2017	14.51	5777	306
08/21/2017	14.51	5667	300
08/22/2017	14.51	5628	298
08/23/2017	14.52	5663	300
08/24/2017	14.51	5710	302
08/25/2017	14.50	5794	306
08/26/2017	14.53	5794	306
08/27/2017	14.50	5795	305
08/28/2017	14.51	5793	306
08/29/2017	14.51	5587	295
08/30/2017	14.50	5773	303
08/31/2017	14.51	5884	310

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MONTHLY CEMS REPORT

MONTH OF SEPTEMBER 2017

Enclosed is the monthly NOx report for the month of September, 2017. There were no shutdown(s) / start up(s) for the month. The maximum 4 hour average was less than 14.7 PPMv NOx.

DATE	MAXIMUM 3 HR. AVERAGE STACK CORRECTED NOX PPM	FUEL CONSUMPTION MCF / DAY	NOX POUNDS / DAY
09/01/2017	14.51	5632	298
09/02/2017	14.51	5625	298
09/03/2017	14.51	5595	292
09/04/2017	14.46	5591	280
09/05/2017	13.87	5623	281
09/06/2017	14.42	5709	298
09/07/2017	14.52	5841	307
09/08/2017	14.51	5977	316
09/09/2017	14.51	5912	312
09/10/2017	14.51	5743	303
09/11/2017	14.52	5756	303
09/12/2017	14.47	5697	298
09/13/2017	14.50	5846	309
09/14/2017	14.52	6006	318
09/15/2017	14.51	5998	317
09/16/2017	14.51	5948	315
09/17/2017	14.50	5920	300
09/18/2017	14.52	5810	305
09/19/2017	14.51	5897	312
09/20/2017	14.53	5934	314
09/21/2017	14.52	5867	310
09/22/2017	14.50	5941	314
09/23/2017	14.71	5858	311
09/24/2017	14.50	5991	317
09/25/2017	14.52	5873	312
09/26/2017	14.51	5833	309
09/27/2017	14.54	5735	304
09/28/2017	14.52	5705	303
09/29/2017	14.51	5683	300
09/30/2017	14.51	5706	302

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MONTHLY CEMS REPORT

MONTH OF OCTOBER 2017

Enclosed is the monthly NOx report for the month of October, 2017. There were no shutdown(s) / start up(s) for the month. The maximum 4 hour average was less than 15.0 PPMv NOx.

DATE	MAXIMUM 3 HR. AVERAGE STACK CORRECTED NOX PPM	FUEL CONSUMPTION MCF / DAY	NOX POUNDS / DAY
10/01/2017	14.54	5868	310
10/02/2017	14.51	5990	317
10/03/2017	14.53	5855	311
10/04/2017	14.52	5741	304
10/05/2017	14.51	5789	307
10/06/2017	14.51	5715	303
10/07/2017	14.70	5772	307
10/08/2017	14.51	5704	302
10/09/2017	14.53	5845	310
10/10/2017	14.53	5914	313
10/11/2017	14.51	5894	312
10/12/2017	14.50	5923	314
10/13/2017	14.51	5901	313
10/14/2017	14.51	5837	309
10/15/2017	14.51	5906	312
10/16/2017	14.49	5698	297
10/17/2017	14.03	5673	278
10/18/2017	14.00	5831	298
10/19/2017	14.01	5669	276
10/20/2017	14.00	5819	271
10/21/2017	14.01	5809	299
10/22/2017	14.98	5830	307
10/23/2017	14.03	5880	301
10/24/2017	14.01	5847	287
10/25/2017	13.02	5638	269
10/26/2017	13.01	5631	269
10/27/2017	13.02	5700	272
10/28/2017	13.02	5688	272
10/29/2017	13.00	5786	276
10/30/2017	13.01	5855	280
10/31/2017	13.01	5865	280

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MONTHLY CEMS REPORT

MONTH OF NOVEMBER 2017

Enclosed is the monthly NOx report for the month of November, 2017. There was 1 shutdown / start up for the month. The maximum 4 hour average was less than 62.2 PPMv NOx.

DATE	MAXIMUM 3 HR. AVERAGE STACK CORRECTED NOX PPM	FUEL CONSUMPTION MCF / DAY	NOX POUNDS / DAY
11/01/2017	13.01	5810	272
11/02/2017	12.71	5840	272
11/03/2017	12.68	5988	275
11/04/2017	12.60	5983	276
11/05/2017	13.46	6318	303
11/06/2017	12.95	5969	279
11/07/2017	13.11	5896	279
11/08/2017	12.69	5904	271
11/09/2017	12.52	5895	271
11/10/2017	12.51	5855	269
11/11/2017	12.51	5566	255
11/12/2017	12.90	5567	259
11/13/2017	12.51	5597	252
11/14/2017	12.23	5772	257
11/15/2017	12.37	5957	267
11/16/2017	12.03	5934	262
11/17/2017	12.34	6157	265
11/18/2017	12.89	5728	263
11/19/2017	SHUTDOWN		
11/20/2017	14.02	3427	161
11/21/2017	13.52	5751	266
11/22/2017	12.10	5702	252
11/23/2017	12.01	5798	256
11/24/2017	12.01	5713	252
11/25/2017	12.02	5813	256
11/26/2017	12.02	5800	256
11/27/2017	12.15	5993	265
11/28/2017	12.32	6016	267
11/29/2017	12.59	6048	271
11/30/2017	12.40	5958	267

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MONTHLY CEMS REPORT

MONTH OF DECEMBER 2017

Enclosed is the monthly NOx report for the month of December, 2017. There were no shutdowns / start ups for the month. The maximum 4 hour average was less than 15.0 PPMv NOx.

DATE	MAXIMUM 3 HR. AVERAGE STACK CORRECTED NOX PPM	FUEL CONSUMPTION MCF / DAY	NOX POUNDS / DAY
12/01/2017	12.38	2468	110
12/02/2017	0.00	0	0
12/03/2017	0.00	0	0
12/04/2017	0.00	0	0
12/05/2017	0.00	0	0
12/06/2017	0.00	0	0
12/07/2017	0.00	0	0
12/08/2017	0.00	0	0
12/09/2017	0.00	0	0
12/10/2017	0.00	0	0
12/11/2017	0.00	0	0
12/12/2017	0.00	0	0
12/13/2017	0.00	0	0
12/14/2017	0.00	0	0
12/15/2017	0.00	0	0
12/16/2017	0.00	0	0
12/17/2017	0.00	0	0
12/18/2017	0.00	0	0
12/19/2017	0.00	0	0
12/20/2017	0.00	0	0
12/21/2017	0.00	0	0
12/22/2017	0.00	0	0
12/23/2017	0.00	0	0
12/24/2017	0.00	0	0
12/25/2017	0.00	0	0
12/26/2017	0.00	0	0
12/27/2017	0.00	0	0
12/28/2017	0.00	0	0
12/29/2017	0.00	0	0
12/30/2017	0.00	0	0
12/31/2017	0.00	0	0

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