PERMIT TO CONSTRUCT

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to construct the air contaminant source(s) described below, in accordance with the laws, rules and conditions as set forth herein.

Permit Number: 082010-005 Project Number: 2010-06-042

Parent Company: Command Web Offset Company

Parent Company Address: 100 Castle Road, Secaucus, NJ 07094

Installation Name: Command Web-Missouri

Installation Number: 051-0043

Installation Address: 7100 One Color Way, Jefferson City, MO 65101

Location Information: Cole County, S19,T44N, R10W

Application for Authority to Construct was made for:
Install a new 15,000 sheet per hour sheetfed non-heatset lithographic printing press with Ultra-Violet (UV) coating capability and a heatset, offset printing press with a maximum web speed of 2559 feet per minute. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, Construction Permits Required.

☐ Standard Conditions (on reverse) are applicable to this permit.

☑ Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

AUG 06 2010

EFFECTIVE DATE
STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devises shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Departments’ Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant sources(s). The information must be made available within 30 days of actual startup. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources’ personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant sources(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. “Conditions required by permitting authority.”

Command Web-Missouri
Cole County, S19,T44N, R10W

1. Emission Limitation
   A. Command Web-Missouri shall emit less than 250.0 tons of Volatile Organic Compounds (VOCs) in any consecutive 12-month period from the entire installation.

   B. Command Web-Missouri shall emit less than ten (10.0) tons individually or twenty-five (25) tons combined of Hazardous Air Pollutants (HAPs) in any consecutive 12-month period from the entire installation.

   C. The entire installation includes all equipment or processes installed or permitted at Command Web-Missouri as of the date of this permit.

   D. Attachment A, Attachment B and Attachment C or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 1.A, and 1.B.

2. Control Equipment – Ecocool/T130-1680 dryer afterburner
   A. The Ecocool/T130-1680 dryer afterburner must be in use at all times when the following equipment is in operation.

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Emission Point Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU08</td>
<td>Goss, 4-color, single web heatset web press</td>
</tr>
</tbody>
</table>

   B. The Ecocool/T130-1680 dryer afterburner shall be operated and maintained in accordance with the manufacturer’s specifications.

   C. The operating temperature of the Ecocool/T130-1680 dryer afterburner shall be continuously monitored and recorded during operations.

   D. The temperature of the Ecocool/T130-1680 dryer afterburner must be maintained plus or minus 50 degrees of 1382 degrees Fahrenheit.
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

E. 100 percent Capture Efficiency

1.) The 100 percent capture was applied to EU-08 and the control device Ecocool/T130-1680 dryer afterburner. That portion of the printer that would allow emissions from the printer and the dryer afterburner shall be enclosed by ductwork. The ductwork shall allow for all of the emissions from the printer and the dryer to be drawn into the ductwork intake draft. The ductwork shall be maintained under negative pressure. It shall not be venting into the room, but exiting out the designated stack.

2.) The dryer afterburner shall demonstrate negative pressure by using visual indicators such as streamers, talc puff test, negative pressure gauges, flags, etc at openings that are not closed during normal operations. All openings must indicate the presence of negative pressure for compliance.

3.) The installation shall perform the visual indicator check for negative pressure at the Ecocool/T130-1680 dryer at least once every week or 7 day period while in operation.

F. Command Web Offset Company shall maintain an operating and maintenance log for Ecocool/T130-1680 dryer afterburner which shall include the following:

1.) Incidents of malfunction, with impact on emissions, duration of events, probable cause, and corrective actions taken.

2.) Maintenance activities, with inspection schedules, repair actions, and replacements.

3.) A record of regular inspection schedule, the date and results of all inspections, including any actions or maintenance activities that result from the inspections. Either paper copy or electronic formats are acceptable.

3. Operational Requirement
Command Web-Missouri shall keep the ink solvents and cleaning solutions in sealed containers whenever the materials are not in use. Command Web-Missouri shall provide and maintain suitable, easily read, permanent markings on all inks, solvent and cleaning solution containers used with this equipment.

4. Record Keeping and Reporting Requirements
A. Command Web-Missouri shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources’ personnel upon
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

request. These records shall include Material Safety Data Sheets (MSDS) for all materials used.

B. Command Web-Missouri shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which any record required by this permit show an exceedance of a limitation imposed by this permit.
REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (5) REVIEW
Project Number: 2010-06-042
Installation ID Number: 051-0043
Permit Number:

Command Web-Missouri
7100 One Color Way
Jefferson City, MO 65101

Parent Company:
Command Web Offset Company
100 Castle Road
Secaucus, N J 07094

Cole County, S19,T44N, R10W

REVIEW SUMMARY

- Command Web-Missouri has applied for authority to install a new 15,000 sheet per hour sheetfed non-heatset lithographic printing press with Ultra-Violet (UV) coating capability and a heatset, offset printing press with a maximum web speed of 2559 feet per minute.

- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment: Xylene (Cas # 1330-20-7), cobalt compounds (Cas# 136-52-7 and 27253-31-2), manganese compounds (Cas# 1336-93-2 and 15956-58-8), glycol ethers (Cas# 111-76-2), and naphthalene (Cas# 91-20-3).

- None of the New Source Performance Standards (NSPS) apply to the installation. 40 CFR Part 60 Subpart QQ, Standards of Performance for the Graphic Arts Industry: Publication Rotogravure, does not apply since the presses in this project do not fall under the definition of publication Rotogravure printing as defined in the NSPS.

- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) apply to this installation. None of the currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment. 40 CFR Part 63 Subpart KK, National Emission Standards for the Printing and Publishing Industry and Subpart JJJJ, National Emissions Standards for Hazardous Air Pollutants: Paper and Other Web Coating both do not apply since the installation is not a major source of HAP emissions.

- A natural gas fired after burner is being used to control the VOC emissions from EU-08 the heat set printer in this permit.
• This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, Construction Permits Required. Potential emissions of all pollutants are below de minimis levels.

• This installation is located in Cole County, an attainment area for all criteria pollutants.

• This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.

• Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.

• Emissions testing is not required for the equipment.

• A revision to the Intermediate Operating Permit is required for this installation within 90 days of equipment startup.

• Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Command Web operates a lithographic printing plant in Jefferson City, Missouri. This plant is one of the country’s largest manufacturers of soft cover juvenile books. The facility currently operates a total of three (3) off set heatset presses. Two of these presses are single color (black ink only). The third is a four color press (35 inch wide) equipped with a Regenerative Thermal Oxidizer (RTO).

This is a minor source under construction permits and operating permits because of the Intermediate Operating permit (received on 03/20/2008 and expires on 07/23/2013) which limits the installation’s emissions to below major amounts for construction permits and operating permits. This construction permit establishes an installation wide 250 ton VOC limit and a less than 10 tons per year individually and less than 25 tons per year combined HAP limits. The VOC limit is higher than the limit of 100 ton found in the operating permit since this site is a non named source it can have emissions up to 250 tons before being considered major for construction permits. However, it would have to get a Part 70 Operating permit to operate at the higher level. A Part 70 Operating permit would make the source a major for operating permits but not a major for construction permits. Presently, the site is considered minor for Operating permits with an intermediate Operating permit.

In addition, during the review of this application, project 2009-04-013 (EU-08, the heat set printer) was combined into this permit. This installation will be 66 inches wide and installed in the same room as the 35 inch wide 4 color web printer.
The following permits have been issued to Command Web-Missouri from the Air Pollution Control Program.

**Table 2: Permit History**

<table>
<thead>
<tr>
<th>Permit Number</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>0194-007</td>
<td>Installation of a 4-unit Perfecting Web Offset lithographic press with 4 splicers, 2 press dryers, 2-6 chill stands.</td>
</tr>
<tr>
<td>1294-001</td>
<td>Installation of a 6-unit Heidelberg Speedmaster Lithographic press and one (1) UV coater.</td>
</tr>
<tr>
<td>1096-017</td>
<td>Installation of one (1) Heidelberg-Harris M1000 Web Press (37.5&quot; x 22.4&quot;) consisting of two (2) natural gas dryers and two (2) Web units.</td>
</tr>
<tr>
<td>012003-010</td>
<td>Installation of four (4) unit Heidelberg heatset web printing press</td>
</tr>
</tbody>
</table>

**PROJECT DESCRIPTION**

Command Web - Missouri has proposed to install new 15,000 sheets per hour sheetfed non - heatset lithographic printing press (EU-09) with Ultra-Violet (UV) coating capability and a heatset off set printing press (EU-08) with a maximum web speed of 2559 feet per minute. The printing equipment is under the technical category of lithographic offset printing not rotogravure. A natural gas fired after burner is being used to control the VOC emissions from EU-08, the heat set printer in this permit. All of the HAP emissions from EU-08 are also VOC and subject to the destruction efficiency as a VOC. This control unit is called an ECOCOOL/T130-1680. The afterburner efficiency was given a capture of 100 percent and a destruction efficiency of 95 percent for VOC and a 90 percent for HAPs. However, no HAP appeared on the MSDS sheet submitted for this project. The site used actual emissions from EU-04 to calculate PTE which does uses Hexane and other HAPs. These HAPs do not appear in the MSDS of the solutions of the new printers and were not counted as part of the PTE of EU-08. However, this printer can use inks containing HAPs that do exceed the Screen Modeling Action Levels (SMAL) and must pass the Risk Assessment Levels or obtain a permit. Inks that contain HAPs and are not a VOC would use the 90 percent destruction efficiency.

The application stated the dryer after burner will be operated at a temperature of 1382 degrees Fahrenheit. The applicant submitted calculations that accounted for a higher degree of destruction, but did not submit test data for this unit and the higher destruction efficiency number was not used. A typical after burner unit operating in this temperature should have a destruction efficiency of 95 percent VOC and 90 percent for HAPs. This unit has both direct and indirect heat sources, combined in the one unit; therefore, the indirect heating rules were not applied to it.

EU-09 the non heat set printing press contains HAPs in the form of cobalt compounds and manganese compounds in the ink solutions. These HAPs are retained in the printed product at 95 percent. This value was used in the calculation of the amount of HAPs emitted from EU-09, the non heat set printer. No control device was used at EU-09.
EMISSIONS/CONTROLS EVALUATION

Potential emissions were estimated using a mass balance approach with data from Material Safety Data Sheet (MSDS) supplied by Command Web. Potential emissions of the new equipment were based on the maximum hourly design rate of the equipment assuming continuous operation (8760 hours per year) and the VOC content in the chemicals. Emission of VOC in printing operations result from the evaporation of solvents in the ink and the solutions used to clean the presses. VOCs and HAPs are the major pollutants of concern for printing operations. Other criteria air pollutants will be emitted by the combustion of natural gas in the 7.165 MMBtu per hour dryer afterburner control device.

According to a memorandum issued by the Director of the Air Pollution Control Program on April 27, 2005, 20% of the solvent is retained in the ink for heatset offset lithographic printers. This results in 80% of the VOC in the inks being emitted. A 95 percent retention is used for non heat set printers. The emission calculations for EU-09 used the 95% destruction efficiency for VOC. The HAPs mentioned in the MSDS sheets are all classified as VOC. Therefore they were assigned the 95 percent destruction efficiency because they are classified as VOC. Existing potential emissions were taken from a previous permit Number 012003-010. Existing actual emissions were taken from the 2008 Emissions Inventory Questionnaire (EIQ). The following table provides an emissions summary for this project.

Table 3: Emissions Summary (tons per year)

<table>
<thead>
<tr>
<th></th>
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<th></th>
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<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>PM$_{10}$</td>
<td>15.0</td>
<td>0.478</td>
<td>0.41</td>
<td>0.24</td>
<td>N/A</td>
</tr>
<tr>
<td>SO$_x$</td>
<td>40.0</td>
<td>0.038</td>
<td>0.03</td>
<td>0.02</td>
<td>N/A</td>
</tr>
<tr>
<td>NO$_x$</td>
<td>40.0</td>
<td>6.33</td>
<td>5.37</td>
<td>3.14</td>
<td>N/A</td>
</tr>
<tr>
<td>VOC</td>
<td>40.0</td>
<td>138.71</td>
<td>24.17</td>
<td>15.5</td>
<td>&lt;100</td>
</tr>
<tr>
<td>CO</td>
<td>100.0</td>
<td>5.31</td>
<td>4.51</td>
<td>2.64</td>
<td>N/A</td>
</tr>
<tr>
<td>HAPs</td>
<td>10.0/25.0</td>
<td>3.11</td>
<td>1.51</td>
<td>1.0</td>
<td>&lt;10.0/25.0</td>
</tr>
<tr>
<td>Naphthalene</td>
<td>10*</td>
<td>N/A</td>
<td>N/A</td>
<td>0.003</td>
<td>N/A</td>
</tr>
<tr>
<td>Glycol Ethers</td>
<td>5*</td>
<td>N/A</td>
<td>N/A</td>
<td>0.49</td>
<td>N/A</td>
</tr>
<tr>
<td>Cobalt Compounds</td>
<td>0.1*</td>
<td>N/A</td>
<td>N/A</td>
<td>0.003</td>
<td>N/A</td>
</tr>
<tr>
<td>Manganese Compounds</td>
<td>0.8*</td>
<td>N/A</td>
<td>N/A</td>
<td>0.009</td>
<td>N/A</td>
</tr>
<tr>
<td>Xylene</td>
<td>10*</td>
<td>N/A</td>
<td>N/A</td>
<td>0.43</td>
<td>N/A</td>
</tr>
</tbody>
</table>

N/A = Not Applicable; N/D = Not Determined
*These values trigger Screen 3 and or refined modeling requirements.
PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of all pollutants are below de minimis levels.

APPLICABLE REQUIREMENTS

Command Web-Missouri shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS

- **Submission of Emission Data, Emission Fees and Process Information**, 10 CSR 10-6.110
  The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required June 1 for the previous year's emissions.

- **Operating Permits**, 10 CSR 10-6.065

- **Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin**, 10 CSR 10-6.170

- **Restriction of Emission of Visible Air Contaminants**, 10 CSR 10-6.220

- **Restriction of Emission of Odors**, 10 CSR 10-3.090

SPECIFIC REQUIREMENTS

- Restriction of Emission of Sulfur Compounds, 10 CSR 10-6.260
STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

________________________________  ________________________________  
Timothy Paul Hines            Date  
Environmental Engineer

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated June 14, 2010, received June 14, 2010, designating Command Web Offset Company as the owner and operator of the installation.


- Northeast Regional Office Site Survey, dated Month Day, Year.

- Air Pollution Control Program Memorandum (retention factors for non-heatset and heatset web offset lithographic printing inks for actual and potential emissions calculations).
Attachment A
VOC Compliance Worksheet for Coatings and Solvents
Command Web - Missouri
Cole County, S19, T44N, R10W
Project Number: 2010-06-042
Installation ID Number: 051-0043
Permit Number: 

This sheet covers the month of __________ in the year __________.

Copy this sheet as needed.

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2 (a)</th>
<th>Column 3</th>
<th>Column 4</th>
<th>Column 5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Material Used (Name, Type)</td>
<td>Amount of Material Used (Include Units)</td>
<td>Density (lbs/gal)</td>
<td>VOC Content (Weight %)</td>
<td>VOC Emissions (Tons)</td>
</tr>
<tr>
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</tbody>
</table>

(b) Total VOC Emissions Calculated for this Month in Tons:

(c) 12-Month VOC Emissions Total from Previous Month's Worksheet A, in Tons:

(d) Monthly VOC Emissions Total (b) from Previous Year's Worksheet A, in Tons:

(e) Current 12-month Total of VOC Emissions in Tons: [(b) + (c) - (d)]

Instructions: Choose appropriate VOC calculation method for units reported:

(a) 1) If usage is in tons - [Column 2] x [Column 4] = [Column 5];
   2) If usage is in pounds - [Column 2] x [Column 4] x [0.0005] = [Column 5];
   3) If usage is in gallons - [Column 2] x [Column 3] x [Column 4] x [0.0005] = [Column 5].

(b) Summation of [Column 5] in Tons;

(c) 12-Month VOC emissions total (e) from last month's Worksheet A, in Tons;

(d) VOC emissions total (b) from previous year's Worksheet A, in Tons;

(e) Monthly Calculate the new 12-month VOC emissions total. A 12-Month VOC emissions total (e) of less than 250.0 tons indicates compliance. Note: This site has a less than 100 ton per year VOC limit in an Operating permit. Compliance with the less than 100 ton per year limit indicates compliance with the 250 ton limit. Two separate recordkeeping forms are not required as long as the 100 ton limit is applied to the installation.
Attachment B – Monthly Total HAPs Emissions Tracking Record

Command Web - Missouri
Cole County, S19, T44N, R10W
Project Number: 2010-06-042
Installation ID Number: 051-0043
Permit Number:

This sheet covers the month of _______________

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2 (a)</th>
<th>Column 3</th>
<th>Column 4</th>
<th>Column 5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Material Used (Name, Type)</td>
<td>Amount of Material Used (Include Units)</td>
<td>Density (lbs/gal)</td>
<td>HAP Content (Weight %)</td>
<td>HAP Emissions (Tons)</td>
</tr>
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</tbody>
</table>

(b) Total HAP Emissions Calculated for this Month (tons):
(c) 12-Month Total HAP Emissions total from Previous Month’s Attachment B (tons):
(d) Monthly Total HAP Emissions Total from previous year’s Attachment B (tons):
(e) Current 12-month Total of HAP Emissions (tons):

Instructions: Choose appropriate VOC calculation method for units reported:
(a) 1) If usage is in tons - [Column 2] x [Column 4] = [Column 5];
    2) If usage is in pounds - [Column 2] x [Column 4] x [0.0005] = [Column 5];
    3) If usage is in gallons - [Column 2] x [Column 3] x [Column 4] x [0.0005] = [Column 5].
(b) Summation of [Column 5] in Tons;
(c) 12-Month HAP emissions total (e) from last month's Worksheet A, in Tons;
(d) Monthly HAP emissions total (b) from previous year's Worksheet A, in Tons;
(e) Calculate the new 12-month HAP emissions total. A 12-Month HAP emissions total (e) of less than 25.0 tons indicates compliance.
Attachment C – Monthly Individual HAPs Emissions Tracking Record

Command Web - Missouri
Cole County, S19, T44N, R10W
Project Number: 2010-06-042
Installation ID Number: 051-0043
Permit Number:

HAP Name: ____________________________ CAS No.: ________

This sheet covers the month of ________________ in the year ________________.

Copy this sheet as needed.

<table>
<thead>
<tr>
<th>Column 1 (a)</th>
<th>Column 2 (b)</th>
</tr>
</thead>
<tbody>
<tr>
<td>List materials from Attachment B which emit this specific HAP (Name, Type)</td>
<td>HAP emissions from Attachment B [Column 5] (in Tons)</td>
</tr>
</tbody>
</table>

(c) Total HAP Emissions Calculated for this Month, in Tons: ____________________________
(d) 12-Month HAP Emissions Total (f) from Previous Month's Attachment C, in Tons: ____________________________
(e) Monthly HAP Emissions Total (c) from Previous Year's Attachment C, in Tons: ____________________________
(f) Current 12-month Total of HAP Emissions in Tons: \( [(c) + (d) - (e)] \):

Instructions: Choose appropriate HAP calculation method for units reported
(a) Individually list each material which emits this specific HAP from this installation;
(b) Record the amount of HAP emissions already calculated for Attachment B in [Column 5] in Tons;
(c) Summation of [Column 2] in Tons;
(d) Record the previous 12-Month individual HAP emission total (f) from last month's Attachment C, in Tons;
(e) Record the monthly HAP emission total (c) from previous year's Attachment C, in Tons; and calculate the new 12-month individual HAP emissions total.

A 12-Month individual HAP emissions total of less than ten (10.0) tons for the installation indicates compliance