



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

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APR 03 2015

Mr. Charles R. Armistead
Manchester Packaging Company
2000 E. James Blvd.
Saint James, MO 65559

Re: Manchester Packaging Company, 161-0039
Permit Number: OP2015-002

Dear Mr. Armistead:

Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty 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 have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

A handwritten signature in black ink that reads "Michael J. Stansfield". The signature is written in a cursive style.

Michael J. Stansfield, P.E.
Operating Permit Unit Chief

MJS:jrk

Enclosures

c: Robert Cheever, US EPA Region VII
Southeast Regional Office
PAMS File: 2012-10-035





PART 70 PERMIT TO OPERATE

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

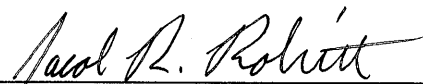
Operating Permit Number: OP2015-002
Expiration Date: **APR 03 2020**
Installation ID: 161-0039
Project Number: 2012-10-035

Installation Name and Address

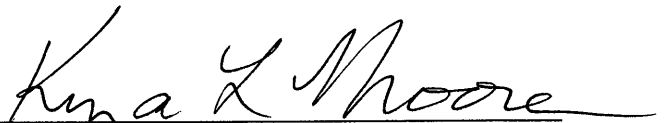
Manchester Packaging Company
2000 E. James Blvd.
Saint James, MO 65559
Phelps County

Installation Description:

Manchester Packaging Company operates a manufacturing facility that is located in St. James. The facility manufactures printed polyethylene film products and is considered a major source for volatile organic compounds.



Prepared by
Jacob Robinett
Operating Permit Unit



Director or Designee
Department of Natural Resources

APR 03 2015

Effective Date

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Manchester Packaging Company is an existing polyethylene film products manufacturing facility in St. James, Missouri. The polyethylene film products produced by the installation are printed and unprinted polyethylene film and printed and unprinted polyethylene bags.

The installation receives polyethylene resin by rail. The polyethylene resin is unloaded from the railcar by the Railcar Unloader Transfer System (EP-10) and transferred to a resin storage silo. The stored polyethylene resin is transferred to the master blenders by Vacuum Loader 2 (EP-14) and then transferred to the auxiliary blenders by Vacuum Loader 1 (EP-13). After blending, the polyethylene resin is transferred to the Extruder (EP-15) by Hopper Loader Transfer System (EP-11) to produce unprinted polyethylene film.

The unprinted polyethylene film is either sold as is or it can be printed and/or formed into bags. The installation operates six flexographic presses (EP-01, EP-02, EP-03, EP-04, EP-05, and EP-06). The installation operates 15 bag machines to form unprinted or printed polyethylene film into bags. Unprinted and printed polyethylene scrap is ground down and reused.

Additional equipment at the installation includes Overhead Press Dryer (EP-16), Deck Press Dryer (EP-17), and Grouped Space Heaters (EP-08, EP-09, and EP-12).

Reported Air Pollutant Emissions, tons per year					
Pollutants	2013	2012	2011	2010	2009
Nitrogen Oxides (NO _x)	0.05	0.04	0.04	0.04	0.05
Volatile Organic Compounds(VOC)	70.11	57.19	46.78	52.27	54.41
Carbon Monoxide (CO)	0.01	-	0.01	-	0.01

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation that emits air pollutants and that are identified as having unit-specific emission limitations.

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EP-05	P-5 Flexographic Printing Press – Overhead Dryer (6-color)
EP-06	P-5 Flexographic Printing Press – Deck Dryer (6-color)
EP-08, EP-09	Grouped Space Heaters, Natural Gas
EP-10	Rail car unloader transfer system
EP-11	Hopper loader transfer system
EP-12	Grouped Space Heaters, Natural Gas
EP-13	Vacuum Loader 1
EP-14	Vacuum Loader 2
EP-15	Extruders (8) with bag filters

EP-16	P-6 Flexographic Printing Press – Overhead Dryer (6-color)
EP-17	P-6 Flexographic Printing Press – Deck Dryer (6-color) Reprocess Grinder with 0.5 μ filter Reprocess Extruder with screen filter Parts Washer (Mineral Spirits) Storage Silos (12) with dry filters Hoppers (10)

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

<u>Emission Unit #</u>	<u>Description of Emission Source</u>
EP-01	PP-01 L-1 Extruder Inline Flexographic Press (HG Weber Prestoflex 30, Constructed 1980)
EP-02	Portable Inline Flexographic Press (HG Weber Prestoflex 30, Constructed - 1990)
EP-03	P-3 Flexographic Printing Press (Plastimac: Plastiflex 120, 4-color printer, constructed in 1984)
EP-04	P-4 Flexographic Printing Press (CMF Superflex 1204, 4-color printer, constructed in 1989) Turret Winders Bagging Units – Side Weld (15) Ink/Solvent Storage

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

<p>PERMIT CONDITION PW001 10 CSR 10-6.060 Construction Permits Construction Permit No. 052014-007, Issued May 22, 2014</p>

Emission Limitation:

The permittee shall emit less than 250.0 tons of VOCs in any consecutive 12-month period from the entire installation detailed below in Table 1: Manchester Packaging Company VOC Emission Units. [Special Condition 1.A.]

Table 1: Manchester Packaging Company VOC Emission Units

Emission Unit	Description
EP-01	L-1 Extruder Inline Flexographic Press – Ink
	L-1 Extruder Inline Flexographic Press – Solvent
EP-02	Portable Inline Flexographic Press – Ink
	Portable Inline Flexographic Press – Solvent
EP-03	P-3 Flexographic Printing Press – Ink
	P-3 Flexographic Printing Press – Solvent
EP-04	P-4 Flexographic Printing Press – Ink
	P-4 Flexographic Printing Press – Solvent
EP-05	Overhead Press Dryer
	P-5 Flexographic Printing Press – Ink
	P-5 Flexographic Printing Press – Solvent
EP-06	Deck Press Dryer
	P-5 Flexographic Printing Press – Ink
	P-5 Flexographic Printing Press – Solvent
EP-08	Space Heating
EP-09	Space Heating
EP-12	Space Heating
EP-15	Extruders
EP-16	Overhead Press Dryer
	P-6 Flexographic Printing Press – Ink
	P-6 Flexographic Printing Press – Solvent
EP-17	Deck Press Dryer
	P-6 Flexographic Printing Press – Ink
	P-6 Flexographic Printing Press – Solvent

Operational Requirement:

The permittee shall keep all inks, solvents, and cleaning solutions in sealed containers whenever the materials are not in use. Manchester Packaging Company shall provide and maintain suitable, easily

read, permanent markings on all inks, solvents, and cleaning solution containers used at the installation. [Special Condition 2]

Monitoring/Recordkeeping:

1. The permittee shall maintain all records required by this permit for not less than five years and shall make them available to immediately to any Missouri Department of Natural Resources' personnel upon request. [Special Condition 3.A.]
2. Attachment A or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance. [Special Condition 1.B.]

Reporting:

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit(s) exceeded the emission limitation(s). [Special Condition 3.B.]
2. The permittee shall report any deviations from the limitations, standards, test methods and procedures, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

PERMIT CONDITION 1		
10 CSR 10-6.220		
Restriction of Emission of Visible Air Contaminants		
Emission Unit	Description	Installation Date
EP-05	P-5 Flexographic Printing Press – Overhead Dryer (Carint Vanguard 1596, MHDR 0.392 MMBtu/hr)	1996
EP-06	P-5 Flexographic Printing Press – Deck Dryer (Carint Vanguard 1596, MHDR 0.392 MMBtu/hr)	1996
EP-08	Grouped Space Heaters – 3 units (Hastings #191490, Hastings #191502, Luxair #UH120LC)	1996
EP-09	Grouped Space Heaters – 2 units (Dayton #E96G007009, Dayton #Q9548753)	1995-2007
EP-10	Rail car unloader transfer system controlled by AEC filter chamber “A” style	1987
EP-11	Hopper loader transfer system controlled by AEC filter chamber “A” style	1985
EP-12	Grouped Space Heaters – 4 units (Tappan GGRC 120C-21)	1998
EP-13	Vacuum Loader 1 controlled by fabric filter	2013
EP-14	Vacuum Loader 2 controlled by fabric filter	2013
EP-15	Extruders (3) (MHDR 250 lb/hr each)	11/26/2012
EP-16	P-6 Flexographic Printing Press – Overhead Dryer (Carint-Gemini 1590, 0.394 MMBtu/hr)	05/22/2014
EP-17	P-6 Flexographic Printing Press – Deck Dryer (Carint-Gemini 1590, 0.394 MMBtu/hr)	05/22/2014
	Resign storage silos (12) with dry filters	
	Hoppers (10)	

Emission Limitation:

1. No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20%. [10 CSR 10-6.220 (3)(A)]
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%. [10 CSR 10-6.220 (3)(B)]

Monitoring/Recordkeeping/Reporting:

None. See Statement of Basis

PERMIT CONDITION 2			
10 CSR 10-6.060 Construction Permits			
Construction Permit No. 112012-014, Issued November 26, 2012			
Emission Unit	Description	MHDR	
		(units per hours)	
EP-10	Railcar Unloader Transfer System	3.125	3.125
EP-11	Hopper Loader Transfer System	3.125	3.125
EP-13	Vacuum Loader 1	3.125	3.125
EP-14	Vacuum Loader 2	3.125	3.125

Emission Limitation:

The permittee shall control emissions from the equipment listed above using fabric filters as specified in the permit applications [Special Condition 1.A.]

Operational Limitations

1. The fabric filters shall be operated and maintained in accordance with the manufacturer's specifications. The fabric filters shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the Department of natural Resources' employees may easily observe them. [Special Condition 1.B.]
2. Replacement filters for the fabric filters shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expect to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Special Condition 1.C.]

Monitoring/Recordkeeping:

1. Attachment B or equivalent forms shall be used by the permittee to monitor and record the operating pressure drop across the fabric filters at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty. [Special Condition 1.D.]
2. Attachment C or equivalent forms shall be used by the permittee to maintain an operating and maintenance log for the fabric filters which shall include the following: [Special Condition 1.E.]
 - a) Incidents of malfunction, with impact on emissions, duration event, probable cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
3. The permittee shall maintain all records required by this permit for no less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. [Special Condition 3.A.]

Reporting:

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit(s) exceeded the emission limitation(s). [Special Condition 3.B.]

2. The permittee shall report any deviations from the limitations, standards, test methods and procedures, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

IV. Core Permit Requirements

The installation shall comply with each of the following regulations or codes. Consult the appropriate sections in the Code of Federal Regulations (CFR), the Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The following is only an excerpt from the regulation or code, and is provided for summary purposes only.

10 CSR 10-6.045 Open Burning Requirements

- (1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- (2) Refer to the regulation for a complete list of allowances. The following is an exception to the allowances:
 - (A) Yard waste;
- (3) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- (4) Manchester Packaging Company may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Manchester Packaging Company fails to comply with the provisions or any condition of the open burning permit.
 - (A) In a nonattainment area, as defined in 10 CSR 10-6.020, paragraph (2)(N)5., the director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- (5) Reporting and Record Keeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR part 60 Subpart CCCC promulgated as of September 22, 2005 shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the director.
- (6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR part 60, Appendix A, Method 9 promulgated as of December 23, 1971 is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065(6)(C)3.B]

10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61 Subpart M National Emission Standard for Asbestos

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information

- 1) The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) The permittee may be required by the director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 5) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 6) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
- 7) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 8) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.170

Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

Emission Limitation:

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour. This odor evaluation shall be taken at a location outside of the installation's property boundary.

10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued,

10 CSR 10-6.065(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

10 CSR 10-6.065(6)(C)1.C General Record Keeping and Reporting Requirements

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
 - iii) Exception. Monitoring requirements which require reporting more frequently than semi-annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
 - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065(6)(C)1.D Risk Management Plan Under Section 112(r)

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

10 CSR 10-6.065(6)(C)1.F Severability Clause

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

10 CSR 10-6.065(6)(C)1.G General Requirements

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The

permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

10 CSR 10-6.065(6)(C)1.H Incentive Programs Not Requiring Permit Revisions

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

10 CSR 10-6.065(6)(C)1.I Reasonably Anticipated Operating Scenarios

None.

10 CSR 10-6.065(6)(C)3 Compliance Requirements

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;

- d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
- e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065(6)(C)6 Permit Shield

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
 - a) The applicable requirements are included and specifically identified in this permit, or
 - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
 - a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
 - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
 - c) The applicable requirements of the acid rain program,
 - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
 - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

10 CSR 10-6.065(6)(C)7 Emergency Provisions

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
 - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(6)(C)8 Operational Flexibility

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously

emitted. The permittee shall notify the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
 - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.
 - b) The permit shield shall not apply to these changes.

10 CSR 10-6.065(6)(C)9 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
 - d) The permit shield shall not apply to these changes.

10 CSR 10-6.020(2)(R)39 Responsible Official

The application utilized in the preparation of this permit was signed by Charles R. Armistead, President. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065(6)(E)6 Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) MDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065(6)(E)1.C Statement of Basis

This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. Attachments

Attachments follow.

Attachment A
VOC Compliance Worksheet

This sheet covers _____ (Copy this sheet as needed.)
 (month, year)

(a)	(b)	(c)	(d)	(e)
Ink, Solvent or additive (Name, Product #)	Amount of Ink, Solvent or Additive used (gallon)	Density (lb/gal)	VOC Content (Weight %)	VOC Emissions (Tons)
Example: Cyan Blue Base/D947 (90002141/54447-116)	10	7.73	73.14%	0.0283
Extruders (EP-15)	(f) Amount of Polyethylene Film Produced (tons)		(g) Emission Factor (lb/ton)	(h)
			0.0398	
Total Natural Gas Combustion	(i) Amount of Natural Gas Used (MMcf)		(j) Emission Factor (lb/MMcf)	(k)
			5.5	
(l) Total VOC Emissions Calculated for this Month in Tons				
(m) 12-month VOC Emissions Total (o) from Previous month's Worksheet in Tons				
(n) Monthly VOC Emissions Total (l) from Previous Year's Worksheet in Tons				
(o) Current 12-month Total of VOC Emissions in Tons: (o) = [(l) + (m) - (n)]				

- (a) Record the names of all inks, solvents and additives used this month.
- (b) Record the respective gallons of inks, solvents and additives used this month.
- (c) Record the respective density of inks, solvents and additives from the MSDS
- (d) Record the Respective VOC content of inks, solvents and additives. Obtain VOC content of other inks, solvents and additives from their respective MSDS. If a range is given for the VOC content, use the highest in the range.
- (e) Calculate VOC emissions from inks, solvents and additives: (e) = [(b) x (c) x (d)] / 2000.
- (f) Record the tons of Polyethylene Film produced by the extruders
- (g) VOC emission factor for the extruder process taken from the *Journal of Air & Waste Management Association* (Volume 46 June 1996) paper "Development of Emission Factors for Polyethylene Processing"
- (h) Calculate VOC emissions from the extruders: (h) = [(f) x (g)] / 2000
- (i) Record the MMcf of natural gas used by Manchester Packaging
- (j) VOC emission factor for natural gas combustion AP 42 Chapter 1.4 Natural Gas Combustion Table 1.4-2.
- (k) Calculate VOC emissions from natural gas combustion: (k) = [(i) x (j)] / 2000
- (l) Sum each individual VOC emissions for this month: (l) = [sum of all VOC emissions in (e)] + (h) + (k)
- (m) Record the 12-month total VOC emissions (o) from last month's Attachment A.
- (n) Record the monthly VOC emissions total (l) from previous year's Attachment A.
- (o) Calculate the current 12-month total VOC emissions. A value less than 250.0 tons of VOC indicates compliance.

STATEMENT OF BASIS

Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Part 70 Operating Permit Application, received October 16, 2012;
- 2) 2013 Emissions Inventory Questionnaire, received April 3, 2014 ;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 4) Construction Permit No. 0198-035;
- 5) Construction Permit No. 112012-014;
- 6) Construction Permit No. 052014-007;
- 7) Operating Permit No. OP2008-020; and
- 8) WebFIRE.

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

None.

Construction Permit History

The following revisions were made to construction permits for this installation:

Construction Permit No. 0198-035

This permit was issued on January 13, 1998 to authorize the installation of a Prestoflex 120 printing press to replace a 4 color flexographic printing press. It also authorized the installation of a CMF Superflex 120 printing press to replace a 4 color Flexographic Printing Press. Also for the construction of a new Carint Vanguard 1596 printing press and two (2) small natural gas deck dryers. There are no special conditions associated with this permit. The equipment was installed between 1984 and 1989 and was constructed prior to receipt of a permit from the Missouri Department of Natural Resources. (EP-03 through EP-06)

Construction Permit No. 112012-014

This permit was issued on November 26, 2012 to authorize the replacement of one existing 450 lb/hr extruder with three new 250 lb/hr extruders (EP-15). The replacement of the extruders resulted in an increase in extrusion capacity and a debottlenecking of the unprinted polyethylene film production process. An increase in the unprinted polyethylene film production potentially increases the amount of polyethylene film available for printing and/or bags. The permit contains three (3) special conditions.

Special Condition 2 is not included in the Operating Permit. Special Condition 2 relates to the storage of inks, solvents and cleaning solutions. However, Special Condition 2 is the same as

Special Condition 2 from Construction Permit No. 052014-007, which is included in this Operating Permit.

Construction Permit No. 052014-007

This permit was issued on May 22, 2014 to authorize the installation of a new P-6 Flexographic Printing Press equipped with two natural gas fired dryers (EP-16 & EP-17). This permit contains three (3) special conditions. Special Condition 2 relates to the storage of inks, solvents, and cleaning solutions. This special condition is the same as Special Condition 2 from Construction Permit No. 112012-014. For redundancy purposes this was only included once in this operating permit in Plant Wide Limitations Permit Condition PW001.

New Source Performance Standards (NSPS) Applicability

40 CFR 60 Subpart QQ, *Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing*

The installation does not operate publication rotogravure printing presses as defined in 40 CFR §60.431(a), therefore this rule is not applicable.

40 CFR 60 Subpart DDD, *Standards of Performance for Volatile Organic compound (VOC) Emissions from the Polymer Manufacturing Industry*

The installation does not manufacture of polypropylene, polyethylene, polystyrene, or poly (ethylene terephthalate), therefore it is not subject to this rule.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63 Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*

The installation does not use any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform as a cleaning or drying agent, therefore it is not subject to this rule.

40 CFR 63 Subpart U, *National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins*

The installation does not contain elastomer product process units as defined by this rule.

40 CFR 63 Subpart W, *National Emission Standards for Hazardous Air Pollutants for Epoxy Resins Production and Non-Nylon Polyamides Production*

This rule does not apply, since the installation does not manufacture liquid epoxy resins.

40 CFR 63 Subpart KK, *National Emission Standards for the Printing and Publishing Industry*

This regulation is not applicable to the installation since it is not a major source for HAPs as defined by 40 CFR §63.2.

40 CFR 63 Subpart JJJ, *National Emission Standards for hazardous Air Pollutant Emissions: Group IV Polymers and Resins*

The installation is not subject to this regulation since it contains no thermoplastic product process unit as defined in this rule.

40 CFR 63 Subpart DDDDD, *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*

This rule does not apply, since the installation is not a major source for HAPs.

40 CFR 63 Subpart JJJJJ, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*

The installation is not subject to this rule since the drying ovens and space heaters do not meet the definition of a boiler per 40 CFR 63 Subpart JJJJJ §63.11237.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None.

Compliance Assurance Monitoring (CAM) Applicability

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

40 CFR Part 64 is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr)¹
CO	1.04
GHG (mass)	1490.29
GHG (CO ₂ e)	1499.09
HAP	0.036
NO _x	1.24
PM ₁₀	3.54
PM ₂₅	3.54
SO _x	0.01
VOC	< 250

¹PTE taken from Construction Permit 052014-007 issued May 22, 2014. The numbers were evaluated assuming continuous operation (8760 hours per year). These numbers used from the construction permit, since there has been no change in equipment since being issued on May 22, 2014.

Other Regulatory Determinations

10 CSR 10-6.100, *Alternate Emission Limits*

This rule is not applicable because the installation is in an ozone attainment area.

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

This rule establishes the maximum allowable concentration of sulfur compounds in source emissions and in the ambient air. The installation is exempt from this rule since the applicable units are fueled only by natural gas per 10 CSR 10-6.260(1)(A)2.

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

This rule applies to all sources of visible emissions throughout the state of Missouri. The majority of equipment at the installation are not a source of particulate matter. The printing presses are sources of VOC's and HAPs. The combustion units all burn natural gas and have PM PTE less than 0.5 lb/hr. Table 1 contains the amount of particulate matter for controlled and uncontrolled devices and demonstrates that the potential emissions indicates that the units are highly unlikely to exceed the limits of this rule. Therefore, no opacity monitoring and record keeping requirements were included in this permit.

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Processes*

This rule applies to any operation, process, or activity that emits particulate matter. The majority of equipment at the installation does not emit particulate matter. The combustion units do not meet the definition of process weight as defined in 10 CSR 10-6.020 (2)(P)60. The following units meet the exemption (1)(B)16. as shown below. 10 CSR 10-6.400(1)(B)16 states that emissions units that at maximum hourly design rate have an uncontrolled potential to emit less than the allowable emissions as calculated using the process weight equations listed in 10 CSR 10-6.400(3)(A)1.

Table 1 Particulate Matter Compliance					
Emission Unit	Description	MHDR (tons/hr) ¹	Emission Factor (lb PM/ton) ²	Uncontrolled PM (lbs/hr)	Process Weight Limit (lbs/hr)
EP-10	Railcar unloader transfer system	3.125	0.66	2.0625	8.8
EP-11	Hopper loader transfer system	3.125	0.66	2.0625	8.8
EP-13	Vacuum Loader 1	3.125	0.66	2.0625	8.8
EP-14	Vacuum Loader 2	3.125	0.66	2.0625	8.8
EP-15	Extruders	3.125	0.1198	0.374	8.8

¹MHDR is taken from the Construction Permit No. 112012-014 Table 2

²Emission Factor is taken from WebFIRE SCC 30101807 for EP-10 through EP-14 for EP-15 the EF was taken from Construction Permit No. 112012-014

10 CSR 10-6.405, *Restriction of Particulate matter Emissions from Fuel Burning Equipment Used for Indirect Heating*

This rule applies to installations in which fuel is burned for the primary purpose of producing steam, hot water, or hot air or other indirect heating of liquids, gases, or solids and, in the course of doing so, the products of combustion do not come into direct contact with process materials. The installation is exempt from this rule since the applicable units are fueled only by propane and natural gas per 10 CFR 10-6.405(1)(E).

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:

1. The specific pollutant regulated by that rule is not emitted by the installation;
2. The installation is not in the source category regulated by that rule;
3. The installation is not in the county or specific area that is regulated under the authority of that rule;
4. The installation does not contain the type of emission unit which is regulated by that rule;
5. The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the APCP's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).