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: OP2017-003
Expiration Date: MAR 13 2022
Installation ID: 031-0072
Project Number: 2015-02-006

Installation Name and Address
Mondi Jackson, LLC - Indian Creek
14591 Highway 177
Jackson, MO 63755
Cape Girardeau County

Installation Description:
Mondi Jackson, Inc. operates a rotogravure and flexographic printing operation and a polyethylene bag manufacturing facility in Jackson, Missouri. Final printed products include films, bags and flexible packaging. Industrial processes include rotogravure printing, blown film extrusion and converting, electroplating and laminating. Mondi Jackson is a major source for VOCs and is subject to 40 CFR Part 63 Subparts N, ZZZZ, and WWWW.

Prepared by
Bern Johnson
Operating Permit Unit

Director or Designee
Department of Natural Resources

MAR 13 2017
Effective Date
# Table of Contents

I. **INSTALLATION EQUIPMENT LISTING** ........................................................................................................3

EMISSION UNITS WITH LIMITATIONS ........................................................................................................3

EMISSION UNITS WITHOUT LIMITATIONS ...............................................................................................3

II. **PLANT WIDE EMISSION LIMITATIONS** ...................................................................................................5

PERMIT CONDITION PW 1 .......................................................................................................................... 5

10 CSR 10-6.020(2)(I)23. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s) ...................................... 5

III. **EMISSION UNIT SPECIFIC EMISSION LIMITATIONS** ...........................................................................6

PERMIT CONDITION 1 ................................................................................................................................. 6

10 CSR 10-6.060 Construction Permits Required .......................................................................................... 6

Construction Permit 052008-002, Issued May 27, 2008 ............................................................................ 6

Construction Permit 082014-018 Issued July 26, 2014 ................................................................................. 6

PERMIT CONDITION 2 ................................................................................................................................. 8

10 CSR 10-6.075 Maximum Achievable Control Regulations ......................................................................... 8

40 CFR Part 63 Subpart N National Emission Standards for Hard and Decorative Chromium
Electroplating and Chromium Anodizing Tanks ........................................................................................... 8

PERMIT CONDITION 3 ............................................................................................................................... 11

10 CSR 10-6.075 Maximum Achievable Control Regulations ......................................................................... 11

Source Standards for Plating and Polishing Operations .............................................................................. 11

PERMIT CONDITION 4 ............................................................................................................................... 13

10 CSR 10-6.075 Maximum Achievable Control Regulations ......................................................................... 13

Reciprocating Internal Combustion Engines ............................................................................................... 13

IV. **CORE PERMIT REQUIREMENTS** ............................................................................................................16

V. **GENERAL PERMIT REQUIREMENTS** ..................................................................................................21

VI. **ATTACHMENTS** ....................................................................................................................................27

ATTACHMENT A ........................................................................................................................................... 28

Inspection/Maintenance/Repair/Malfunction Log ....................................................................................... 28

ATTACHMENT B ........................................................................................................................................... 29

Electroplating Operation and Maintenance Plan .......................................................................................... 29
I. Installation Equipment Listing

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.

<table>
<thead>
<tr>
<th>2015 EIQ Emission Point #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>ATM 4-1</td>
<td>Roto Press 2201</td>
</tr>
<tr>
<td>ATM 4-2</td>
<td>Roto Press 2202</td>
</tr>
<tr>
<td>ATM 4-3</td>
<td>Roto Press 2203</td>
</tr>
<tr>
<td>ATM 18</td>
<td>Cylinder preparation – nickel plating</td>
</tr>
<tr>
<td>ATM 20</td>
<td>Cylinder preparation – chrome plating (fiber mist eliminator)</td>
</tr>
<tr>
<td>ATM 22</td>
<td>Emergency diesel water pumps (2)</td>
</tr>
<tr>
<td>ATM 28</td>
<td>Roto Press 2204</td>
</tr>
<tr>
<td>ATM 29</td>
<td>Laminator 2253</td>
</tr>
<tr>
<td>ATM 31</td>
<td>Roto Press 2205</td>
</tr>
<tr>
<td>ATM 40</td>
<td>Flexographic Press 2201</td>
</tr>
</tbody>
</table>

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.

<table>
<thead>
<tr>
<th>2015 EIQ Emission Point #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>ATM 1</td>
<td>10,000 gallon storage tank (ethyl acetate)</td>
</tr>
<tr>
<td>ATM 2</td>
<td>10,000 gallon storage tank (solvent blend)</td>
</tr>
<tr>
<td>ATM 5</td>
<td>Ink mixing and storage</td>
</tr>
<tr>
<td>ATM 17</td>
<td>Cylinder preparation – degreasing</td>
</tr>
<tr>
<td>ATM 19</td>
<td>Cylinder preparation – copper plating</td>
</tr>
<tr>
<td>ATM 21</td>
<td>Cylinder preparation – de-chrome (fiber mist eliminator)</td>
</tr>
<tr>
<td>ATM 23</td>
<td>Corona treater ozone exhaust</td>
</tr>
<tr>
<td>ATM 24</td>
<td>Polyethylene pellet silos</td>
</tr>
<tr>
<td>Equipment Code</td>
<td>Description</td>
</tr>
<tr>
<td>----------------</td>
<td>-------------</td>
</tr>
<tr>
<td>ATM 25</td>
<td>Blown film extrusion lines</td>
</tr>
<tr>
<td>ATM 27</td>
<td>PRI parts washing system (incorporating ATM-9, ATM-13, and ATM-15)</td>
</tr>
<tr>
<td>ATM 30</td>
<td>Copper engraving</td>
</tr>
<tr>
<td>ATM 32</td>
<td>10,000 gallon storage tank (N-propyl acetate)</td>
</tr>
<tr>
<td>ATM 33</td>
<td>10,000 gallon storage tank (waste ink and solvent)</td>
</tr>
<tr>
<td>ATM 34</td>
<td>hot water heater, propane</td>
</tr>
<tr>
<td>ATM 35</td>
<td>Miscellaneous propane usage emissions</td>
</tr>
<tr>
<td>ATM-41</td>
<td>10,000 gal N-Propyl Alcohol tank</td>
</tr>
<tr>
<td>ATM-42</td>
<td>hot water heater, propane</td>
</tr>
<tr>
<td>ATM-D1</td>
<td>diesel storage tank</td>
</tr>
</tbody>
</table>
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. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations or Emission Units without Limitations.

<table>
<thead>
<tr>
<th>PERMIT CONDITION PW 1</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 CSR 10-6.020(2)(I)23. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)</td>
</tr>
</tbody>
</table>

**Emission Limitation:**
The permittee shall emit less than 245.0 tons of VOCs from Mondi Jackson – Indian Creek in any consecutive 12-month period. (Note: this limit applies only to emission units located at 14591 State Highway 177, Jackson, MO 63755).

**Monitoring/Recordkeeping:**
1) The permittee shall maintain an accurate record of VOC emissions. Air Program staff have reviewed a custom tracking sheet, VOC Tracker with Flexo v3.0.xls, and approved it to demonstrate compliance with the VOC emission limit [Special Condition 5B]. Updated versions may be used, but must include:
   i) list of emission units that emits VOCs,
   ii) methods to be used in calculating VOC emissions from each listed emission unit, and
   iii) capture and control efficiencies for each control device.
2) The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources’ personnel upon request. These records shall include Safety Data Sheets. [Special Condition 6]

**Reporting:**
1) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month in which the permittee determines that the installation exceeded the emission limitation listed above.
2) The permittee shall report any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual and annual monitoring report 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 10-6.060 Construction Permits Required  
Construction Permit 052008-002, Issued May 27, 2008  
Construction Permit 082014-018 Issued July 26, 2014

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Manufacturer/Model #</th>
</tr>
</thead>
<tbody>
<tr>
<td>ATM 4-1</td>
<td>Rotogravure Press 2201: rotogravure printing press; construction date 1990; connected to Adwest regenerative thermal oxidizers (CD-05 and CD-06)</td>
<td>Windmoller Holscher/ Mekur Heliostar</td>
</tr>
<tr>
<td>ATM 4-2</td>
<td>Rotogravure Press 2202: rotogravure printing press; construction date 1991; connected to Adwest regenerative thermal oxidizers (CD-05 and CD-06)</td>
<td>Windmoller Holscher/ Mekur Heliostar</td>
</tr>
<tr>
<td>ATM 4-3</td>
<td>Rotogravure Press 2203: rotogravure printing press; construction date 1994; connected to Adwest regenerative thermal oxidizers (CD-05 and CD-06)</td>
<td>Windmoller Holscher/ Heliostar 8901</td>
</tr>
<tr>
<td>ATM 28</td>
<td>Rotogravure Press 2204: rotogravure printing press; construction date 2001; connected to Adwest regenerative thermal oxidizers (CD-05 and CD-06)</td>
<td>Windmoller Holscher/ Heliostar 2000</td>
</tr>
<tr>
<td>ATM 31</td>
<td>Rotogravure Press 2205: rotogravure printing press; construction date 2008; connected to Adwest regenerative thermal oxidizers (CD-05 and CD-06)</td>
<td>Shaanxi Bieren/ FR400</td>
</tr>
<tr>
<td>ATM 29</td>
<td>Laminator 2253: 1.7 meter laminator; applies adhesive to polyethylene film; construction date 2006; connected to Adwest regenerative thermal oxidizers (CD-05 and CD-06) when utilizing solvent based adhesives or ink</td>
<td>Nordmeccanica/L-1700</td>
</tr>
<tr>
<td>ATM 40</td>
<td>Flexo Press M2221: flexographic printing press; construction date October 2014; connected to Adwest regenerative thermal oxidizers (CD-05 and CD-06)</td>
<td>Windmoller Holscher/ Miraflex CL10</td>
</tr>
</tbody>
</table>

Note: Compliance Assurance Monitoring applied to these units in the past, but are now exempt under 40 CFR 64.2(b)(1)(vi).

**Operational Specifications:**

1) The permittee shall vent emissions from units ATM 4-1, 4-2, 4-3, 28, 31, and 40 to one or both of the regenerative thermal oxidizers (RTOs) whenever the presses are in operation. [Special Condition 3A (052008-002) and 2A(082014-018) ]

2) When ATM 29 is utilizing solvent-based adhesives or ink, the permittee shall vent emissions to one or both of the RTOs. [Special Condition 3A (052008-002) ]

3) The permittee shall operate all RTOs in accordance with manufacturer’s specifications. A copy of the manufacturer’s specifications shall be kept on-site. The Adwest regenerative thermal oxidizers (CD-05 and CD-06) shall be operated at a temperature of at least 1500º Fahrenheit and shall be
equipped with a continuous temperature monitoring system. The temperature monitoring system shall alert the operator whenever the oxidizer temperature drops below 1500º Fahrenheit. The permittee shall take corrective actions as necessary to maintain the required operating parameters. [Special Condition 3A (052008-002) and 2B/C(082014-018)]

4) The permittee shall have a process control mechanism in place on the RTOs such that when the primary thermal oxidizer exceeds 90% of its capacity, the secondary RTO must come on-line and up to temperature prior to the start-up of additional VOC-generating process equipment. [Special Condition 3B (052008-002)]

5) The permittee shall conduct performance testing for both of the RTOs (CD-05 and CD-06) to determine VOC destruction efficiency at least once every five years. [Special Condition 4B(082014-018)]

6) The permittee may voluntarily elect to conduct capture efficiency testing, or the Air Pollution Control Program may require additional capture efficiency testing if a finding is made that the characteristics of the building enclosure vary significantly from the previous test conditions (September 2014). [Special Condition 5 (052008-002)]

7) All doors for the building shall remain closed during operations except during personnel and equipment entry and exit (i.e. there should be no propping open of the doors, etc.). All access panels on ATM-40 shall also remain closed any time the printing press is in operation. [Special Condition 3C(082014-018)]

8) The permittee shall keep the ink solvents and cleaning solutions in sealed containers whenever the materials are not in use. The permittee shall provide and maintain suitable, easily read, permanent markings on all inks, solvent and cleaning solution containers used with this equipment. [Special Condition 4(082014-018)]

**Monitoring:**

1) The permittee shall continuously monitor and record the following process parameters to ensure proper operation of the VOC control devices: [Special Condition 3C]
   a) Combustion zone and bed temperatures for the thermal oxidizers; and,
   b) Alternating current frequency delivered to fan motor(s) for fans that are used to move VOC-laden process gases through the thermal oxidizers.

2) The permittee shall monitor and record the pressure drop from ambient air to inside the printing room at least once per operating day to verify effective capture of VOCs from the rotogravure printing presses and laminater. [Special Condition 3D (052008-002)].

**Recordkeeping:**

1) The permittee shall maintain records of the following process parameters:
   a) Combustion zone and bed temperatures for the thermal oxidizers;
   b) Alternating current frequency delivered to fan motor(s) for fans that are used to move VOC-laden process gases through the thermal oxidizers; and,
   c) Daily pressure drop from ambient air to inside the rotogravure printing room.

2) The permittee shall maintain an operating and maintenance log for the thermal oxidizers and associated equipment (such as fan motors), which shall include the following: [Special Condition 3E (052008-002)]
   a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
   b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

3) All records shall be maintained for five years. Records may be kept electronically.
4) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon their verbal request and presentation of identification.

**Reporting:**
The permittee shall pre-arrange the performance test date(s) with the Air Pollution Control Program a minimum of 30 days prior to the proposed test date so that a pre-test meeting may be arranged if necessary, and to assure that the test date is acceptable for an observer from the Air Pollution Control Program to be present. A proposed test plan shall be submitted to the Air Pollution Control Program a minimum of 30 days prior to the proposed test date. The test plan must be approved by the Air Pollution Control Program prior to the test date. [Special Condition 4C (052008-002)]

---

### PERMIT CONDITION 2

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Manufacturer/ Model #</th>
</tr>
</thead>
<tbody>
<tr>
<td>ATM 20</td>
<td>Chrome Electroplating: chrome plating for cylinder preparation; construction date 1991; MHDR 5,000 amp/hr; connected to fiber-bed mist eliminator</td>
<td>Saueressig/ 1919559</td>
</tr>
</tbody>
</table>

**Emission Limitation:**
The permittee shall control chromium emissions discharged to the atmosphere from ATM 20 by:

1) Not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed 0.015 mg/dscm (6.6 × 10⁻⁶ gr/dsc) [§63.342(c)(1)(ii)] or,

2) Not adding perfluorooctane sulfonic acid (PFOS) based fume suppressants to any affected open surface hard chromium electroplating tank. [§63.342(c)(1)(v)]

**Operational Limitations:**

1) The permittee is subject to these operation and maintenance practices:
   a) At all times, including periods of startup, shutdown, and malfunction, owners or operators shall operate and maintain ATM 20, including its associated air pollution control device and monitoring equipment, in a manner consistent with good air pollution control practices; [§63.342(f)(1)(i)] and
   b) Malfunctions shall be corrected as soon as practicable after their occurrence. [§63.342(f)(1)(ii)]

2) Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Director, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the source. [§63.342(f)(2)(i)]

3) Based on the results of a determination made under 2) above, the Director may require that the permittee make changes to the operation and maintenance plan required by 4) below. Revisions may be required if the Director finds that the plan:
   a) Does not address a malfunction that has occurred; [§63.342(f)(2)(ii)(A)]
   b) Fails to provide for the proper operation of the affected source, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices; or [§63.342(f)(2)(ii)(B)]
c) Does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable. [§63.342(f)(2)(ii)(C)]

4) The permittee shall prepare an operation and maintenance plan, which is incorporated by reference into this permit.
   a) The operation and maintenance plan shall include the following elements:
      i) The plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device (if such a device is used to comply with the emission limits), and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of this equipment; [§63.342(f)(3)(i)(A)]
      ii) The plan shall incorporate the operation and maintenance practices for the selected control device, a fiber-bed mist eliminator, as follows: [§63.342(f)(3)(i)(B)]
         1. Once per quarter, visually inspect fiber-bed unit and prefiltering device to ensure there is proper drainage, no chromic acid buildup in the units, and no evidence of chemical attack on the structural integrity of the devices;
         2. Once per quarter, visually inspect ductwork from tank or tanks to the control device to ensure there are no leaks; and
         3. Per manufacturer’s specifications, perform washdown of fiber elements in accordance with manufacturer’s recommendations.
      iii) The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur; and [§63.342(f)(3)(i)(D)]
      iv) The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment and for implementing corrective actions to address such malfunctions. [§63.342(f)(3)(i)(E)]
      v) The plan shall include housekeeping procedures as specified in Table 2 of §63.342. [§63.342(f)(3)(i)(F)]
   b) If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the permittee shall revise the operation and maintenance plan within 45 days after such an event occurs. The revised plan shall include procedures for operating and maintaining the process equipment, add-on air pollution control device, or monitoring equipment during similar malfunction events, and a program for corrective action for such events. [§63.342(f)(3)(ii)]
   c) To satisfy the requirements in 4), the permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans, provided the alternative plans meet the requirements of this section. [§63.342(f)(3)(vi)]

**Monitoring:**
The permittee has opted to demonstrate continuous compliance with a *Fiber-bed mist eliminator*. The permittee shall monitor and record the pressure drop across the fiber-bed mist eliminator. To be in compliance with the standards, the fiber-bed mist eliminator shall be operated within ±1 inch of water column of the pressure drop value established during the initial performance test, or shall be operated within the range of compliant values for pressure drop established during multiple performance tests. [§63.343(c)(4)(ii)]
Recordkeeping:
1) The permittee shall maintain the following records for ATM-20 [§63.346(b)]:
   a) Inspection records for the fiber-bed mist eliminator and monitoring equipment. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection;
   b) Records of all maintenance performed on ATM-20, the fiber-bed mist eliminator, and monitoring equipment, except routine housekeeping practices;
   c) Records of the occurrence, duration, and cause (if known) of each malfunction of ATM-20, add-on air pollution control, and monitoring equipment;
   d) Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning equipment to its normal or usual manner of operation;
   e) Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan in Operational Limitation 4);
   f) Test reports documenting results of all performance tests;
   g) All measurements as may be necessary to determine the conditions of performance tests;
   h) Records of monitoring data from Monitoring;
   i) The specific identification (i.e, the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of ATM-20, the fiber-bed mist eliminator, or monitoring equipment;
   j) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of ATM-20, the fiber-bed mist eliminator, or monitoring equipment;
   k) The total process operating time of the affected source during the reporting period;
   l) For sources using fume suppressants to comply with the standards, records of the date and time that fume suppressants are added to the electroplating or anodizing bath and records of the fume suppressant manufacturer and product name.

2) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon their verbal request and presentation of identification.
3) All records shall be retained for five years.

Reporting:
1) The permittee shall submit applicable reports as specified in §63.342 as necessary (see Statement of Basis).
2) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month in which the permittee determines that the installation exceeded the emission limitation listed above.
3) The permittee shall report any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual and annual monitoring report required by Section V of this permit.
PERMIT CONDITION 3
10 CSR 10-6.075 Maximum Achievable Control Regulations
40 CFR Part 63 Subpart WWWWWW National Emission Standards for Hazardous Air Pollutants:
Area Source Standards for Plating and Polishing Operations

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Manufacturer/ Model #</th>
</tr>
</thead>
<tbody>
<tr>
<td>ATM 18</td>
<td>Nickel Electroplating: nickel plating for cylinder preparation; Tank 161; construction date 1991; MHDR 1,500 amp/hr</td>
<td>Saueressig/ NA</td>
</tr>
</tbody>
</table>

Note: The permittee also uses ATM 18 for anodized copper plating, during which ATM 18 is not subject to 40 CFR Part 63 Subpart WWWWWW.

Operational Limitations:
1) The permittee has elected to comply with the work practice standards in Subpart WWWWWW using either a control device ([§63.11507(a)(2)]) or a tank cover ([§63.11507(a)(3)):
   a) The permittee may capture and exhaust emissions from the affected tank to one of the following emission control devices: composite mesh pad, packed bed scrubber, or mesh pad mist eliminator: [§63.11507(a)(2)]
      i) The permittee must operate all capture and control devices according to the manufacturer's specifications and operating instructions. [§63.11507(a)(2)(i)]
      ii) The permittee must keep the manufacturer's specifications and operating instructions at the facility at all times in a location where they can be easily accessed by the operators. [§63.11507(a)(2)(ii)] or,
   b) The permittee may cover the tank surface over all of the effective surface area of the tank for at least 95% of the electrolytic process operating time. [§63.11507(a)(3)(i)]
2) The permittee must implement the following management practices as practicable: [§63.11507(g)]
   a) Minimize bath agitation when removing any parts processed in the tank, as practicable except when necessary to meet part quality requirements. [§63.11507(g)(1)]
   b) Maximize the draining of bath solution back into the tank, as practicable, by extending drip time when removing parts from the tank; using drain boards (also known as drip shields); or withdrawing parts slowly from the tank, as practicable. [§63.11507(g)(2)]
   c) Optimize the design of barrels, racks, and parts to minimize dragout of bath solution (such as by using slotted barrels and tilted racks, or by designing parts with flow-through holes to allow the tank solution to drip back into the tank), as practicable. [§63.11507(g)(3)]
   d) Use tank covers, if already owned and available at the installation, whenever practicable. [§63.11507(g)(4)]
   e) Minimize or reduce heating of process tanks, as practicable (e.g., when doing so would not interrupt production or adversely affect part quality). [§63.11507(g)(5)]
   f) Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with affected sources, as practicable. [§63.11507(g)(6)]
   g) Minimize bath contamination, such as through the prevention or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pre-treated parts to be plated, as practicable. [§63.11507(g)(7)]
   h) Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks, as practicable. [§63.11507(g)(8)]
   i) Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns, as practicable. [§63.11507(g)(9)]
j) Minimize spills and overflow of tanks, as practicable. [§63.11507(g)(10)]

k) Use squeegee rolls in continuous or reel-to-reel plating tanks, as practicable. [§63.11507(g)(11)]

l) Perform regular inspections to identify leaks and other opportunities for pollution prevention. [§63.11507(g)(12)]

**Monitoring:**

The permittee must satisfy the following to demonstrate continuous compliance: [§63.11508(d)]

1) The permittee must maintain its affected source, including air pollution control equipment. [§63.11508(d)(1)]

2) If the permittee uses a control device to comply with Subpart WWWWWW, it must demonstrate continuous compliance as follows [§63.11508(d)(4)]:
   a) The permittee must operate and maintain the control system according to the manufacturer's specifications and instructions. [§63.11508(d)(4)(i)]
   b) Following any malfunction or failure of the capture or control devices to operate properly, the permittee must take immediate corrective action to return the equipment to normal operation according to the manufacturer's specifications and operating instructions. [§63.11508(d)(4)(ii)]
   c) The permittee must state in its annual certification that it has operated and maintained the control system according to the manufacturer's specifications and instructions. [§63.11508(d)(4)(iii)]
   d) The permittee must record the results of all control system inspections, deviations from proper operation, and any corrective action taken. [§63.11508(d)(4)(iv)]
   e) The permittee must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators. [§63.11508(d)(4)(v)]

3) If the permittee complies with Subpart WWWWWW by operating the affected tank with a cover, it must demonstrate continuous compliance according as follows [§63.11508(d)(6)]:
   a) The permittee must operate the tank with the cover in place at least 95% of the electrolytic process operating time. [§63.11508(d)(6)(i)]
   b) The permittee must record the times that the tank is operated and the times that the tank is covered on a daily basis. [§63.11508(d)(6)(ii)]
   c) The permittee must state in its annual certification that it has operated the tank with the cover in place at least 95% of the electrolytic process time. [§63.11508(d)(6)(iii)]

4) The permittee must demonstrate continuous compliance according as follows [§63.11508(d)(8)]:
   a) The permittee must implement the applicable management practices during all times that the affected tank or process is in operation. [§63.11508(d)(8)(i)]
   b) The permittee must state in its annual compliance certification that it has implemented the applicable management practices, as practicable. [§63.11508(d)(8)(ii)]

**Recordkeeping:**

1) The permittee must keep records as follows [§63.11509(e)]:
   a) A copy of any Initial Notification and Notification of Compliance Status that was submitted and all documentation supporting those notifications. [§63.11509(e)(1)]
   b) The records required to show continuous compliance with each **Operational Limitation** above. [§63.11509(e)(3)].

2) The permittee must keep each record for a minimum of five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. It must keep each record onsite for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. It may keep the records offsite for the remaining three years. [§63.11509(f)]
3) These records shall be made available immediately for inspection to the Department of Natural Resources’ personnel upon their verbal request and presentation of identification.

**Reporting:**

1) The permittee must prepare an annual certification of compliance report. These reports do not need to be submitted unless a deviation from the requirements of Subpart WWWWWW has occurred during the reporting year, in which case, the annual compliance report must be submitted along with the deviation report. [§63.11509(c)]

   a) If the permittee uses a control device, it must state in its annual certification that it has operated and maintained the control system according to the manufacturer’s specifications and instructions. [§63.11509(c)(2)]

   b) If the permittee operates a tank with a cover, it must state in its annual certification that it has operated the tank with the cover in place at least 95% of the electrolytic process time. [§63.11509(c)(4)]

   c) The permittee must state in its annual compliance certification that it has implemented the applicable management practices, as practicable. [§63.11509(c)(6)]

   d) Each annual compliance report must be prepared no later than January 31 of the year immediately following the reporting period and kept in a readily-accessible location for inspector review. If a deviation has occurred during the year, each annual compliance report must be submitted along with the deviation report, and postmarked or delivered no later than January 31 of the year immediately following the reporting period. [§63.11509(c)(7)]

2) If any deviations from the compliance requirements specified in Subpart WWWWWW occurred during the year, the permittee must report the deviations, along with the corrective action taken, to the EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219 with a copy to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, [§63.11509(d)]

**PERMIT CONDITION 4**

10 CSR 10-6.075 Maximum Achievable Control Regulations

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Manufacturer/Model #</th>
</tr>
</thead>
</table>

**Operational Limitations:**

1) The permittee shall operate the emergency stationary RICE according to the requirements in a) through c) below. In order for the engine to be considered an emergency stationary RICE under 40 CFR 63 Subpart ZZZZ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year is prohibited. [§63.6640(f)]

   a) There is no time limit on the use of emergency stationary RICE in emergency situations. [§63.6640(f)(1)]
b) The permittee may operate the emergency stationary RICE for the purposes specified in i) below for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by c) below count as part of the 100 hours per calendar year allowed. [§63.6640(f)(2)]

i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. [§63.6640(f)(2)(i)]

c) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph §63.6640(f)(2). Except as provided in i) below, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§63.6640(f)(4)]

i) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: [§63.6640(f)(4)(ii)(A) though (E)]

A.) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.
B.) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
C.) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
D.) The power is provided only to the facility itself or to support the local transmission and distribution system.
E.) The permittee identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine permittee.

2) If the permittee does not operate the engine according to the requirements in 1)a) through c) above, the engine will not be considered an emergency engine under 40 CFR 63 Subpart ZZZZ and must meet all requirements for non-emergency engines. [§63.6640(f)]

3) The permittee must operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§63.6625(e)(3)]

4) The permittee shall minimize the engine’s time spent at idle during startup and minimize the engine’s startup time to a period needed for appropriate and safe loading of the engine, not to exceed thirty minutes, after which additional standards apply (see Tables 1a, 2a, 2c, and 2d to Subpart ZZZZ) [§63.6625(h)]

5) The permittee shall [Table 2d from §63.6603]:
a) Change oil and filter every 500 hours of operation or annually, whichever comes first.
   i) The permittee may use an oil analysis program to extend the specified oil change
      requirement. The oil analysis must be performed at the same frequency specified for
      changing the oil in Table 2d to this subpart. The analysis program must at a minimum
      analyze the following three parameters: Total Base Number, viscosity, and percent water
      content. The condemning limits for these parameters are as follows: Total Base Number
      is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil
      has changed by more than 20 percent from the viscosity of the oil when new; or percent
      water content (by volume) is greater than 0.5. If all of these condemning limits are not
      exceeded, the engine owner or operator is not required to change the oil. If any of the
      limits are exceeded, the engine owner or operator must change the oil within 2 business
      days of receiving the results of the analysis; if the engine is not in operation when the
      results of the analysis are received, the engine owner or operator must change the oil
      within 2 business days or before commencing operation, whichever is later. The owner or
      operator must keep records of the parameters that are analyzed as part of the program, the
      results of the analysis, and the oil changes for the engine. The analysis program must be
      part of the maintenance plan for the engine.

b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first.

c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and
   replace as necessary.

**Monitoring/Recordkeeping:**
1) The permittee shall maintain an operating and maintenance log using Attachment A or an equivalent.
   [§63.6655(a)(2)]
2) The permittee shall record each instance in which the engine’s oil and filter were not changed
   according the schedule in Operating Limitation 5) i) above. [§63.6640(b)]
3) The permittee must keep records of the hours of operation of the engine that is recorded through the
   non-resettable hour meter. The owner or operator must document how many hours are spent for
   emergency operation, including what classified the operation as emergency and how many hours are
   spent for non-emergency operation. [§63.6655(f)]
4) These records shall be made available immediately for inspection to the Department of Natural
   Resources’ personnel upon request.
5) All records must be maintained for five (5) years.

**Reporting:**
The permittee shall report any deviations from the operational limitation, monitoring, recordkeeping,
and reporting requirements of this permit condition to EPA Region VII, 11201 Renner Blvd., Lenexa,
KS 66219 with a copy to the Air Pollution Control Program’s Compliance and Enforcement Section,
P.O. Box 176, Jefferson City, MO 65102.
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) 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.

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 10-6.110 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 10-6.165 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 10-6.170 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 10-6.250 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.

### 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.

### 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
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,

<table>
<thead>
<tr>
<th>10 CSR 10-6.065(6)(C)1.B</th>
<th>Permit Duration</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 CSR 10-6.065(6)(E)3.C</td>
<td>Extension of Expired Permits</td>
</tr>
</tbody>
</table>

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. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

| 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, Compliance and 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. 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,
   Compliance and 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, Compliance and 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, Compliance and 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 contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. 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)34 Responsible Official**
The application utilized in the preparation of this permit was signed by Bob Malone, VP Operations. 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
### Inspection/Maintenance/Repair/Malfunction Log

Emission Unit # ____________________________

<table>
<thead>
<tr>
<th>Date/Time</th>
<th>Inspection/Maintenance Activities</th>
<th>Malfunction Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Malfunction</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Attachment B
Electroplating Operation and Maintenance Plan

EHSPR P.031 Electroplating Operation and Maintenance Plan
Version D [10-08-12]

**Equipment:** Electroplating equipment and control device information.

<table>
<thead>
<tr>
<th>Equipment</th>
<th>Identification (Point No.)</th>
<th>Maximum Cumulative Potential Rectifier capacity (amp-hr/yr)</th>
<th>Control Device Type</th>
<th>Control Device ID Number</th>
<th>Exhaust Flow Rate (m³/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hard Chrome Electroplating Tank</td>
<td>ATM-20 EU0070</td>
<td>(5000 x 8400 x 0.7) = 29,400,000</td>
<td>Fiber Bed Mist Eliminator</td>
<td>CD-03</td>
<td>3000</td>
</tr>
<tr>
<td>Nickel Plating</td>
<td>ATM-18 EU0080</td>
<td>(1500 x 8400 x 0.7) = 8,820,000</td>
<td>Fiber Bed Mist Eliminator</td>
<td>CD-07</td>
<td>1700</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>= 38,220,000</td>
</tr>
</tbody>
</table>

The following practices are applicable to each of the above tanks.

<table>
<thead>
<tr>
<th>Hard Chrome Electroplating Tank Requirements</th>
<th>Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operate control device.</td>
<td>All times when operating.</td>
</tr>
<tr>
<td>Record Value for Pressure Drop and Amp Hour Usage</td>
<td>Daily</td>
</tr>
<tr>
<td>Flush device for 5 minutes to clean. Check that drain line is clear. Verify pressure drop performs within range.</td>
<td>Once per Month or as nec. due to pressure drop req.</td>
</tr>
<tr>
<td>Visually inspect device to ensure there is proper drainage, no buildup on the device, and no evidence of chemical attack on the structural integrity of the device.</td>
<td>Once per quarter or as nec.</td>
</tr>
<tr>
<td>Visually inspect back portion of the mist eliminator to ensure that it is dry and there is no breakthrough of mist.</td>
<td>Once per quarter or as nec.</td>
</tr>
<tr>
<td>Visually inspect the ductwork from tank to the control device to ensure there are no leaks.</td>
<td>Once per quarter or as nec.</td>
</tr>
<tr>
<td>Turn on water to wash-down mist eliminator section for approximately five minutes. Turn off water flow.</td>
<td>Once per quarter or as nec.</td>
</tr>
<tr>
<td>Pitot tube – back-flush with water, or remove from the duct and rinse with fresh water. Replace in duct and rotate 180 degrees to ensure that the zero reading is obtained. Check pitot tube ends for damage. Replace pitot tube if cracked or fatigued.</td>
<td>Once per quarter or as nec.</td>
</tr>
<tr>
<td>Nickel Electroplating Tank Requirements</td>
<td>Frequency</td>
</tr>
<tr>
<td>----------------------------------------</td>
<td>-----------</td>
</tr>
<tr>
<td>Operate control device.</td>
<td>All times when operating.</td>
</tr>
<tr>
<td>Record Value for Pressure Drop</td>
<td>Daily</td>
</tr>
<tr>
<td>Flush device for 5 minutes to clean. Check that drain line is clear. Verify pressure drop performs within range.</td>
<td>As nec. due to pressure drop req.</td>
</tr>
<tr>
<td>Visually inspect device to ensure there is proper drainage, no buildup on the device, and no evidence of chemical attack on the structural integrity of the device.</td>
<td>Once per quarter or as nec.</td>
</tr>
<tr>
<td>Visually inspect back portion of the mist eliminator to ensure that it is dry and there is no breakthrough of mist.</td>
<td>Once per quarter or as nec.</td>
</tr>
<tr>
<td>Visually inspect the ductwork from tank to the control device to ensure there are no leaks.</td>
<td>Once per quarter or as nec.</td>
</tr>
</tbody>
</table>

**Malfunctions:**
- Pressure drop and inlet velocity pressure are measured and recorded daily on the devices “Daily Monitoring Log”.
- The readings must be taken and the equipment operated at all times with the choke valve at 100% open.
- If the pressure drop (dP) values are outside of the acceptable range, the problem must be immediately reported to the Safety and Environmental Manager and the problem corrected.

**Record Keeping:**
- Maintenance activities described in the above sections must be recorded on EHSFORM D.018 Chrome Operation and Maintenance Checklist or EHSFORM D.088 Nickel Operation and Maintenance Checklist.
- Daily monitoring of the operation control device is also performed and recorded on either EHSLOG D.007 Daily Chrome Monitoring Log or EHSLOG D.027 Daily Nickel Monitoring Log.
- All forms and this O & M Plan must be retained per site ISO procedures.

**Revisions:**
- If either control device malfunctions, or the pressure drop (dP) or inlet velocity pressure are outside the allowable range of values, the situation must be corrected as soon as practicable.
- If this O & M Plan fails, it must be modified within 45 days.

**Actions:**
- Any actions inconsistent with this O & M Plan must be reported to the appropriate agencies, by phone, within two (2) days of their occurrence.
STATEMENT OF BASIS

INSTALLATION DESCRIPTION
Mondi Jackson, Inc. owns and operates a rotogravure and flexographic printing operation and polyethylene bag manufacturing facility at 14591 State Highway 177 in Jackson, MO. This facility manufactures items such as polyethylene films, bags, and flexible packaging. It previously operated under the name of Nordenia U.S.A., Inc. and was known as Nordenia #1. It is now referred to as Mondi Jackson – Indian Creek.

Mondi Jackson, Inc. also owns and operates a polyethylene bag manufacturing facility at 3151 N. High Street in Jackson, MO. This operation formerly also operated under the name of Nordenia U.S.A., Inc. and was known as Nordenia #2. It is now referred to as Mondi Jackson – Hubble Creek. The two installations are considered one installation for permitting purposes, but Hubble Creek has a separate Part 70 operating permit.

Mondi Jackson – Indian Creek is not a named source.

Updated Potential to Emit for Indian Creek

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Potential to Emit (tons/yr)</th>
<th>HAP</th>
<th>Potential to Emit (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO</td>
<td>9.85</td>
<td>Chromium 0.23</td>
<td></td>
</tr>
<tr>
<td>NOx</td>
<td>49.45</td>
<td>Nickel 0.59</td>
<td></td>
</tr>
<tr>
<td>PM10</td>
<td>4.41</td>
<td>Toluene 0.01</td>
<td></td>
</tr>
<tr>
<td>PM2.5</td>
<td>4.41</td>
<td>total HAP 0.83</td>
<td></td>
</tr>
<tr>
<td>SOx</td>
<td>2.65</td>
<td></td>
<td></td>
</tr>
<tr>
<td>VOC</td>
<td>1650.92</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.

Reported Air Pollutant Emissions, tons per year, for Indian Creek

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>PM10</td>
<td>1.52</td>
<td>1.55</td>
<td>1.58</td>
<td>1.28</td>
<td>2.10</td>
</tr>
<tr>
<td>PM2.5</td>
<td>1.52</td>
<td>1.55</td>
<td>1.58</td>
<td>1.28</td>
<td>2.10</td>
</tr>
<tr>
<td>Sulfur Oxides</td>
<td>0.21</td>
<td>0.25</td>
<td>0.24</td>
<td>0.18</td>
<td>0.09</td>
</tr>
<tr>
<td>Nitrogen Oxides</td>
<td>2.70</td>
<td>3.27</td>
<td>3.20</td>
<td>2.37</td>
<td>1.15</td>
</tr>
<tr>
<td>Volatile Organic Compounds</td>
<td>25.55</td>
<td>27.68</td>
<td>18.59</td>
<td>12.29</td>
<td>18.24</td>
</tr>
<tr>
<td>Carbon Monoxide</td>
<td>1.56</td>
<td>1.89</td>
<td>1.85</td>
<td>1.37</td>
<td>0.66</td>
</tr>
<tr>
<td>Hazardous Air Pollutants (HAPs)</td>
<td>0.04</td>
<td>0.04</td>
<td>0.03</td>
<td>0.02</td>
<td>0.02</td>
</tr>
</tbody>
</table>

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 February 2, 2015;
2) 2015 Emissions Inventory Questionnaire, received March 4, 2016;
3) Construction Permit 052008-002; issued May 27, 2008;
4) Construction Permit 082014-018; issued July 26, 2014;
5) WebFIRE; and

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

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

10 CSR 10-6.100, *Alternate Emission Limits*
This rule is not applicable because the installation is in an ozone attainment area.

10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions* – this rule is not applied to the Hot Water Heaters (ATM 7 and 34) because according to (1)(A), combustion equipment that uses exclusively liquefied petroleum gas is exempt. Two diesel emergency engines, ATM22 A & B, are exempt because federal rules restrict sulfur content of fuel to less than level in 3(c).

10 CSR 10-6.170, *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin* – the monitoring and reporting requirements of this rule are not necessary and were removed from the Core Permit Section because particulate emissions are very low and not likely to reach the property boundary.

10 CSR 10-6.180, *Measurement of Emissions of Air Contaminants* – this rule was removed from the Core Permit Section because there are no emission units to which it would apply.

10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants* – this rule was removed from the Core Permit Section because there are no emission units to which it would apply.

10 CSR 10-6.405, *Restriction Particulate Matter Emissions from Fuel Burning Equipment Used for Indirect Heating* – this rule does not apply because all of the heating equipment at the facility is fuel by propane [(1)(C)].

Construction Permit History

All conditions of the following construction permits were superseded by Construction Permit 052008-002:
1289-003, issued December 14, 1989 - this permit was issued for the construction of equipment that can print and laminate polyethylene.

0690-015A, issued June 29, 1990 - this permit was issued for construction of an extrusion process to form polyethylene sheeting from bulk polyethylene.

1293-014, issued November 29, 1993 - this permit was issued for the addition of a solvent washing machine.

0794-013, issued July 19, 1994 - this permit was issued for the construction of a rotogravure printing press and wicket bag machine.

0795-010, issued July 5, 1995 - this permit was issued for a waste solvent reclamation unit (ATM 9) to distill spent solvents and inks for reuse.

102000-026, issued October 13, 2000 - this permit was issued for Rotogravure Press 2204 (ATM 28).

042006-005, issued April 12, 2006 - this permit was issued for the installation of Laminator 2253 (ATM 29).

042006-005A, issued November 22, 2006 - this amendment allows for one-color printing on Laminator 2253 (ATM 29).

Construction Permit 052008-002, issued May 27, 2008 - this permit was issued for the installation of additional printing capacity, replacement of thermal oxidizer and upgrade of parts washing system. Special Condition 4.B establishes performance testing requirements for the regenerative thermal oxidizers to determine VOC destruction efficiency. The latest performance testing was completed on September 16 & 17, 2014. VOC destruction efficiency was 99.6% for CD-05 and 98.8% for CD-06. Testing for both of the thermal oxidizers must be repeated in five years. Special Condition 2, VOC emission limit, was superseded by CP 082014-002.

Construction Permit 042012-006, issued April 13, 2012 - this permit was issued when the installation of a new facility, Mondi Jackson – Hubble Creek, debottlenecked this installation. All condition of this permit were superseded by Construction Permit 082014-018.

Construction Permit 082014-018 – this permit was issued for the installation of a new flexographic printing press. All conditions from 042012-006 and condition 2 from 052008-002 were superseded. Permit Condition 5 includes a VOC emission limit of 245 tpy on all then-existing units. Since operations and emission units change over time, this limit has been applied as a voluntary plant wide condition (PW 1). A separate unit-specific permit condition for the emission units listed in the construction permit is not needed because the plant wide limit inherently limits emissions from those units to 245 tpy. Tracking of emissions is done by a customized spreadsheet developed by Mondi Jackson. Due to size and complexity, a paper copy is not included in this document. An electronic copy can be obtained from the Air Pollution Control Program on request.

**New Source Performance Standards (NSPS) Applicability**

40 CFR Part 60 Subpart QQ, *Standards of Performance for the Graphics Arts Industry: Publication Rotogravure Printing* - this rule does not apply to the rotogravure printing presses (ATM 4-1, ATM 4-2, ATM 4-3, ATM 28, and ATM 31) because the presses do not meet the definition for “publication rotogravure printing press” as defined in 40 CFR §60.431.

40 CFR Part 60 Subpart Kb, *Standard of Performance for Volatile Organic Liquid Storage Vessels* - this rule applies to storage vessels with a capacity greater than 40 cubic meters (m³) that are used to store
volatile organic liquids. There are no storage vessels at Mondi Jackson – Indian Creek that meet this definition.

40 CFR Part 60 Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines - this rule does not apply to the emergency fire pump engines (ATM 22A and ATM 22B) because they were installed in 1991 which is prior to the applicability date of July 1, 2006.

Maximum Achievable Control Technology (MACT) Applicability
40 CFR Part 63 Subpart N, National Emission Standards for Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks - chrome electroplating (ATM 20) is subject to this rule. Those sections of Subpart N that apply to existing hard chromium electroplating tanks located at a small, hard chromium electroplating facility utilizing a fiber-bed mist eliminator are incorporated into Permit Condition 2. The reporting requirements of §63.347 have been met. If necessary, Mondi Jackson – Indian Creek must submit reports required in §63.342.

40 CFR Part 63 Subpart T, National Emission Standards for Halogenated Solvent Cleaning - this rule is not applied because the facility does not use methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform in its degreasing operations.

40 CFR Part 63 Subpart WWWWWW, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations – chrome electroplating (ATM 20) is not subject to this rule because according paragraph 63.11505(3)(d)(1), this rule does not apply to process units that are subject to the requirements of 40 CFR Part 63, Subpart N.

Nickel Electroplating (ATM 18) is subject to this rule. Those sections of Subpart WWWWWW that apply to existing nickel electroplating tanks that utilize either a control device or a tank cover to comply with the work practice standards are incorporated into Permit Condition 3.

Copper Electroplating (ATM 19) is not subject to this rule because copper is not a plating and polishing metal HAP as defined by §63.11511. Plating and polishing metal HAP include the following metals: cadmium, chromium, lead, manganese, and nickel.

Initial Notification required by §63.11509 was received by the Air Pollution Control Program on November 3, 2008. Therefore, sections of this rule regarding initial notification are not included.

40 CFR Part 63 Subpart KK, National Emission Standards for the Printing and Publishing Industry – this rule only applies to facilities that are major sources of HAPs. This facility is not a major source of HAPs, therefore, the rule is not applicable.

40 CFR Part 63 Subpart ZZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines – this rule applies to the two diesel fired emergency fire pump engines (ATM 22A and ATM 22B). They are subject to the requirements for compression ignition emergency engines less than 500 hp located at an area source of HAP.

40 CFR Part 63 Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources – this rule is not applied because the facility’s hot water heaters (ATM 34 and 42) are considered to be gas-fired boilers, which are exempt per §63.11195(3).
National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability
In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

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.

In previous operating permits, 40 CFR Part 64 was determined to be applicable to Rotogravure Printing Presses 2201, 2202, 2203, 2204, 2205, Laminator 2253, and Flexo Press M2221. However, Construction Permit 082014-018 established monitoring requirements, which resulted in these units being exempt under 40 CFR 64.2(b)(1)(vi).

Other Regulatory Determinations
10 CSR 10-6.400, Restriction of Emission of Particulate Matter from Industrial Processes
a) This rule is not applied to ATM 22, 34, 35, or 42 because liquids and gases used solely as fuels are excluded in defining process weight.
b) This rule is not applied to the units in Table 1 because according to (B)(12), emission units that at a maximum design capacity have a potential to emit less than one-half (0.5) pounds per hour of particulate matter are exempt.
Table 1 – Determination of 10 CSR 10-6.400 PM limit

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>MHDR (per hour)</th>
<th>Emission Factor (units)</th>
<th>Pre-Control PTE (lbs/hr)*</th>
</tr>
</thead>
<tbody>
<tr>
<td>ATM 18</td>
<td>1500 amperes</td>
<td>0.63 grains/ampere</td>
<td>0.135</td>
</tr>
<tr>
<td>ATM 19</td>
<td>0.21 10k ft^2</td>
<td>0.00771 lbs/10k ft^2</td>
<td>0.002</td>
</tr>
<tr>
<td>ATM 20</td>
<td>3000 amperes</td>
<td>0.25 grains/ampere</td>
<td>0.107</td>
</tr>
<tr>
<td>ATM 21</td>
<td>1000 amperes</td>
<td>0.25 grains/ampere</td>
<td>0.036</td>
</tr>
<tr>
<td>ATM 24</td>
<td>1.18 tons</td>
<td>0.018688 lb/ton</td>
<td>0.022</td>
</tr>
<tr>
<td>ATM 25</td>
<td>0.32 lbs</td>
<td>0.07388 lb/ton</td>
<td>0.068</td>
</tr>
<tr>
<td>ATM 30</td>
<td>0.07 tons</td>
<td>0.0045 lb/ton</td>
<td>&gt; 0.001</td>
</tr>
</tbody>
</table>

These calculations demonstrate that these units are always in compliance with 10 CSR 10-6.400.

* - includes conversion factor of 7,000 grains/lb.

**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).
Response to Public Comments

A draft of the Part 70 Operating Permit for Mondi Jackson, LLC – Indian Creek was placed on public notice on November 18, 2016, by the Missouri Department of Natural Resources (MDNR). Comments were received from Mr. Robert Cheever of Region VII of the Environmental Protection Agency. The four comments are addressed in the order in which they appear within the letter.

Comment #: 1
First, Permit Condition PW1 incorporates some of the special conditions placed on Mondi Jackson- Indian Creek from Permit to Construct #082014-018, issued July 26, 2014. Permit Condition PW1 establishes a volatile organic compounds (VOC) emission limit of 245.0 tons in any consecutive 12- month period, as required by Special Condition 5. However, Special Condition 5 also includes a table of all of the emission points and/or emission units subject to the emission limitation and Permit Condition PW1 does not include this table. EPA believes this table of emission points/units is critical to verifying compliance and EPA strongly recommends MDNR include Table 1, from Permit to Construct #082014-018, in Permit Condition PW1.

Additionally, MDNR indicates in Permit Condition PW1 that they have reviewed and approved a Mondi Jackson-Indian Creek developed VOC tracking spreadsheet. However, this compliance tracking documentation has not been made available for public review and comment, which EPA believes does not satisfy the public participation requirements of 10 CSR 10-6.065(7)(A)1. Also, by not attaching the VOC compliance data collection and calculation methodology to this operating permit, MDNR is jeopardizing the enforceability of the resulting information. Again, EPA strongly recommends MDNR attach example(s) of the Mondi Jackson-Indian Creek VOC compliance data acquisition system, including a discussion of the data calculation(s), to verify compliance.

Response to Comment:
Plant wide Condition PW 1 was modified to a voluntary plant wide limit of 245 tpy. This will automatically limit the emission points listed in the table to 245 tpy, making a separate emission unit specific permit condition unnecessary. The Statement of Basis was updated to include this change.

The custom tracking sheet used to verify compliance with PW1 includes all VOC sources, though they are not labelled exactly the same. The tracking sheet is more detailed than the table in CP#082014-018 and based off ink, solvent, and fuel throughputs. The Statement of Basis was updated to indicate that an electronic copy of the custom VOC tracking spreadsheet could be obtained from the Air Program.

Comment #: 2
Second, Permit Condition 1 incorporates special conditions from Permit to Construct #052008-002, issued May 27, 2008 and Permit to Construct #082014-018, issued July 26, 2015 that apply to Emission Units ATM 4-1, ATM 4-2, ATM 4-3, ATM 28, ATM 29, ATM 31 and ATM 40. Operational Specification 4) requires the use of the secondary RTO (regenerative thermal oxidizer) when the primary thermal oxidizer exceed 90% of its capacity. However, there does not appear to be any monitoring which would indicate the point when the primary thermal oxidizer reaches 90% capacity. EPA strongly recommends Mondi Jackson-Indian
Creek and MDNR include the capacity monitoring system for the primary thermal oxidizer within Permit Condition 1.

Additionally, the record keeping in Permit Condition 1 requires the permittee to maintain records of combustion zone and bed temperatures for the thermal oxidizers; the alternating current frequency delivered to fan motors; and daily pressure drop from ambient to inside rotogravure printing room. However, neither the monitoring nor record keeping requirements describe the contingent actions Mondi Jackson-Indian Creek is to initiate when these monitored control parameters are exceeded. EPA recommends MDNR provide the contingent corrective actions associated with the monitoring parameters within Permit Condition 1.

Response to Comment:
Monitoring of RTO capacity and combustion zone & bed temperatures is done automatically. Ramp-up and switching to the secondary RTO is done automatically according to pre-set parameters. The RTOs are automated and controlled by an Allen Bradley SLC 5/05 PLC system. The actions needed to bring control devices into compliance with required parameters depend on the nature of the problem. Corrective measures are described in the operating instructions for the equipment.

Comment #: 3
Third, Permit Condition 2 incorporates the applicable requirements from 40 CFR Part 63, Subpart N: National Emission Standards for Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks; for emission unit ATM 20. Operational limitation 4) requires the permittee to prepare an operation and maintenance plan which "is incorporated by reference into this permit." If the operation and maintenance plan is incorporated into this permit, then in accordance with the public participation requirements of 10 CSR 10-6.065(7)(A)l, the plan shall be available for public review and comment. Therefore, EPA strongly recommends MDNR attach Mondi Jackson-Indian Creek operation and maintenance plan required by Permit Condition 2 to the Part 70 Permit to Operate.

Response to Comment:
The Operation and Maintenance plan was added to the permit as Attachment B.

Comment #: 4
Fourth, Permit Condition 4 incorporates the applicable requirements, for emission unit ATM 22A and emission unit ATM 22B, from 40 CFR Part 63, Subpart ZZZZ: National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. It appears that Mondi Jackson-Indian Creek is an area source of hazardous air pollutants (HAPs), and MDNR relies on the EPA for the compliance management of area source hazardous air pollutant maximum control technology standards. 40 CFR part 63, Subpart ZZZZ is one of these area source standards and therefore the compliance reports required by Permit Condition 4 should be submitted to the Missouri Air Compliance Coordinator at EPA Region 7 with MDNR receiving copies, as necessary. The reporting requirement in Permit Condition 4 should be modified to reflect this reporting scenario.

Response to Comment:
The Reporting section of Permit Condition 4 was modified to have Region VII as the primary recipient of compliance reports with copies going to the Air Program.
Mr. Bob Malone
Mondi Jackson, LLC - Indian Creek
14591 Highway 177
Jackson, MO 63755

Re: Part 70 Operating Permit, Facility ID 031-0072
Permit Number: OP2017-003

Dear Mr. Malone:

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.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at http://dnr.mo.gov/regions/. The online CAV request can be found at http://dnr.mo.gov/cav/compliance.htm.

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

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

MJSbjj

Enclosures

c: PAMS File: 2015-02-006