

**MISSOURI**  
DEPARTMENT OF  
NATURAL RESOURCES  
Air Pollution Control Program

## 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:** OP2017-064

**Expiration Date:** AUG 23 2022

**Installation ID:** 083-0046

**Project Number:** 2016-08-004

**Installation Name and Address**

TC Transcontinental Packaging - Capri 2  
1801 N. Gerhart Dr.  
Clinton, MO 64735  
Henry County

**Parent Company's Name and Address**

TC Transcontinental Packaging  
400 Sainte-Croix Ave.  
Suite 200 East  
Saint-Laurent QC H4N 3L4  
Canada

**Installation Description:**

TC Transcontinental Packaging – Capri 2 is a flexographic printing facility that produces cheese wrappers. The installation used to be a synthetic minor source under an intermediate permit for Volatile Organic Compounds (VOC), but is now a major source of VOC after a new addition in Construction Permit 112015-002.

Prepared by  
Kasia Wasescha  
Operating Permit Unit

Director or Designee  
Department of Natural Resources

**AUG 23 2017**

Effective Date

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## 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.

<b>Emission Unit</b>	<b>Description</b>
EP-06	Flexopress #4; MHDR = 0.12 ton/hr
EP-07	Flexopress #5; MHDR = 0.12 ton/hr
EP-08B	Flexopress #6; MHDR = 0.44 ton/hr
EP-09B	Flexopress #7; MHDR = 0.36 ton/hr
CD2	Natural Gas-Fired Catalytic Oxidizer #2; MHDR = 2.5 MMBtu/hr
CD3	Natural Gas-Fired Regenerative Thermal Oxidizer #1; MHDR = 2.894 MMBtu/hr

### EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

<b>Emission Unit</b>	<b>Description</b>
-	Vianord EVO4 Incremental Processor
-	Natural Gas-Fired Heating Units
-	Laser Scoring
EP-03	Cyrel Fast Platemaking
EP-04	Cyrel Fast Platemaking
EP-08A	Natural Gas Fired Drying Oven #6; MHDR = 0.625 MMBtu/hr
EP-09A	Natural Gas Fired Drying Oven #7; MHDR = 0.625 MMBtu/hr

## 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 and Emission Units without Limitations.

### **PERMIT CONDITION PW001**

10 CSR 10-6.060 Construction Permits Required  
Construction Permit 112015-002, Issued November 2, 2015

#### **Emission Limitation:**

The permittee shall emit less than 250.0 tons per year of VOC from the entire installation in any consecutive 12-month period. [112015-002, Special Condition 3A]

#### **VOC Credit:**

To take credit for the VOC content in the solvent reclaim and/or hazardous waste ink, the permittee shall obtain the VOC content of the solvent reclaim and hazardous waste ink by testing, obtained once every quarter (3 months). The lowest VOC content of the solvent reclaim and hazardous waste ink previously obtained should be used. After 12 months, if the testing shows similar results and minimal effect of VOC emissions calculations, as determined by the Air Pollution Control Program's Compliance/Enforcement Section, the permittee may apply to reduce the testing frequency requirements. [112015-002, Special Condition 3C]

- a) In lieu of testing, the permittee may also obtain the VOC content from the recycler. The permittee may use reports from the recycler to create an average VOC content percentage. The Total VOC emissions from the solvents can be represented as follows:
  - i)  $\text{Actual VOC emissions from solvents before control (lbs)} = \text{Solvent used before control (lbs)} \times \text{VOC Content (wt\%)} - \text{Quantity of solvent reclaim/hazardous waste ink (lbs)} \times \text{VOC Content (wt\%)}$ .

#### **Monitoring/Recordkeeping:**

1. The permittee shall use Attachment B, or an equivalent, to track VOC emissions. [112015-002, Special Condition 3C]
2. The permittee shall maintain all records required for not less than five years and shall make them available immediately to any Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used. [112015-002, Special Condition 7A]

#### **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 during which records indicate an exceedance of the emission limitations.
2. The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

**PERMIT CONDITION PW002**  
10 CSR 10-6.065 Voluntary Limitation(s)

**Emission Limitation:**

The permittee shall emit less than 2.0 tons per year of formaldehyde from the entire installation in any consecutive 12-month period.

**Monitoring/Recordkeeping:**

1. The permittee shall use Attachment C, or an equivalent, to track formaldehyde emissions.
2. The permittee shall maintain all records required for no less than five years and shall make them available immediately to any Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used.

**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 during which records indicate an exceedance of the emission limitations.
2. The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

**PERMIT CONDITION PW003**

10 CSR 10-6.060 Construction Permits Required  
Construction Permit 072003-019, Issued June 3, 2003  
Construction Permit 112015-002, Issued November 2, 2015

**Operational Limitation:**

1. The permittee shall keep all solvents, inks, 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 solvent, ink, and cleaning solution containers. [112015-002, Special Condition 6A]
2. The permittee shall place cleaning cloths, used with the cleanup solvents, in tightly closed containers when not in use and while awaiting off-site transportation. [072003-019, Special Condition 2B]

**Reporting:**

The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

**PERMIT CONDITION PW004**

10 CSR 10-6.060 Construction Permits Required  
Construction Permit 112015-002, Issued November 2, 2015

**Use of Alternate Material:**

1. When considering using an alternate material different than listed in Attachment D, the permittee shall calculate the potential emission of each individual HAP using a maximum hourly design rate of 0.36 tons/hr of ink. [112015-002, Special Condition 4A]
2. For the required forms, the permittee shall use a capture efficiency of 85% and control device efficiency of 98% for emission units controlled by the RTO. [112015-002, Special Condition 4B]

- a) The permittee may use a higher control device efficiency if stack testing results indicate a higher value and the stack testing results have been approved by the Air Pollution Control Program's Compliance/Enforcement Section. If the permittee decides to conduct a new stack test, the permittee shall use the stack testing procedures outlined in Special Condition 5 of Construction Permit 112015-002. [112015-002, Special Condition 3C]
3. If the potential emissions of any individual HAP calculated in Special Condition 4B of Construction Permit 112015-002 are equal to or greater than the Screening Model Action Level (SMAL) listed in the Air Pollution Control Program's Table of Hazardous Air Pollutants Screen Model Action Levels available at: <http://dnr.mo.gov/env/apcp/docs/cp-hapsmaltbl6.pdf>, the permittee shall seek approval from the Air Pollution Control Program before use of the alternative material. [112015-002, Special Condition 4C]

**Monitoring/Recordkeeping:**

The permittee shall retain all records (including the SDS for all materials used at the facility) for no less than five years and shall make them immediately available to any Department of Natural Resources personnel upon request.

**Reporting:**

The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

### III. Emission Unit Specific Emission Limitations

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

<b>PERMIT CONDITION 001</b>	
10 CSR 10-6.060 Construction Permits Required Construction Permit 072003-019, Issued June 03, 2003 Construction Permit 102010-008A, Issued July 29, 2013 Construction Permit 112015-002, Issued November 2, 2015 40 CFR Part 64, Compliance Assurance Monitoring (CAM)	
Emission Unit	Description
CD2	Natural Gas-Fired Catalytic Thermal Oxidizer #2
CD3	Natural Gas-Fired Regenerative Thermal Oxidizer #1
EP-06	Flexopress #4
EP-07	Flexopress #5
EP-08B	Flexopress #6
EP-09B	Flexopress #7

**Operational Limitation:**

1. The permittee shall control the emissions from each emission point with its assigned control device while operational. [112015-002, Special Condition 2A & 102010-008A, Special Condition 2A]

Emission Unit	Description	Control Device
EP-06	Flexopress #4	CD2
EP-07	Flexopress #5	CD2
EP-08B	Flexopress #6	CD3
EP-09B	Flexopress #7	CD3

2. The permittee shall operate and maintain CD2 and CD3 in accordance with the manufacturer’s specifications.[112015-002, Special Condition 2B & 072003-019, Special Condition 1A]

**Monitoring/Recordkeeping:**

1. The permittee shall maintain an operating and maintenance log, using Attachment A or an equivalent, for CD2 and CD3 which shall include the following: [112015-002, Special Condition 2D & 072003-019, Special Condition 1B]
  - a) Incidents of malfunction, with impacts on emissions, duration of events, probable cause, and corrective actions.
  - b) Maintenance activities, with inspection schedule (including dates and results of all inspections), repair actions, and replacements, etc.
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 Department of Natural Resources’ personnel upon request. These records shall include SDS for all materials used. [112015-002, Special Condition 7A]

**Reporting:**

The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

<p><b>PERMIT CONDITION 002</b>                  10 CSR 10-6.060 Construction Permits Required                  Construction Permit 072003-019, Issued June 03, 2003                  Construction Permit 112015-002, Issued November 2, 2015                  10 CSR 10-6.065 Operating Permits                  40 CFR Part 64, Compliance Assurance Monitoring (CAM)</p>	
Emission Unit	Description
CD2	Natural Gas-Fired Catalytic Thermal Oxidizer #2
CD3	Natural Gas-Fired Regenerative Thermal Oxidizer #1

**Operational Limitation:**

1. CD2 shall be operated and maintained to assure a minimum VOC destruction efficiency of 98% and a minimum VOC capture efficiency of 85%. [072003-019, Special Condition 1A]
2. The current temperature recorder on CD3 monitors the temperatures from the combustion chamber and the two media beds and records the highest temperature of the three. The highest of the three temperatures shall be maintained at no less than 1,600°F. The temperature monitor shall have an accuracy within ± 1% of the temperature being measured and shall be located such that the Department of Natural Resources' personnel may easily observe it. [112015-002, Special Condition 2C]

**Initial Compliance:** [10 CSR 10-6.065(6)(C)1.C.(I)(b)]

1. The permittee shall complete performance testing on CD2 within 180 days after issuance of this operating permit.
2. A completed Proposed Test Plan Form must be submitted to the Air Pollution Control Program 30 days prior to the proposed test date so that the Air Pollution Control Program may arrange a pretest meeting, if necessary, and assure that the test date is acceptable for an observer to be present. The Proposed Test Plan may serve the purpose of notification and must be approved by the Director prior to conducting the required emission testing.
3. Any performance test shall be conducted during period of representative conditions and shall be conducted at the maximum process rate or within ten percent (10%) of this rated capacity, not to include periods of start-up, shutdown, or malfunction.
4. Two (2) copies of a written report of the performance test results shall be submitted to the Director within 30 days of the completion of any required testing. The report must include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required U.S. EPA Method for at least one sample run.
5. The test report is to fully account for all operational and emission parameters addressed in the permit conditions of this operating permit as well as in any other applicable state or federal rules or regulations.
6. If testing shows that CD2 does not meet compliance with the operational limitations of this permit condition, the permittee shall submit a Compliance Plan to the Air Pollution Control Program within 90 days of testing indicating plans to modify or replace CD2 in order to meet compliance with its limitations.



**Monitoring/Recordkeeping:**

1. The permittee shall retain the most recent 5 years of records on-site and make them available to the Department of Natural Resources' personnel upon request.
2. The permittee shall retain on-site the most recent performance testing results of CD2 and CD3.
3. The permittee shall follow the requirements of the CAM Plan. See Attachment E. [CAM]

**Reporting:**

The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

## IV. Core Permit Requirements

The installation shall comply with each of the following regulations or codes. Consult the appropriate sections in the Code of Federal Regulations (CFR), the Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The following are only excerpts from the regulation or code, and are 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) 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 to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity 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, notice shall be given as soon as practicable prior to the activity.
- 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. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

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

The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.

#### **10 CSR 10-6.110 Reporting of Emission Data, Emission Fees and Process Information**

- 1) The permittee shall submit a 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) 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.
- 3) 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.

#### **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 10-6.180 Measurement of Emissions of Air Contaminants**

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

### **10 CSR 10-6.250 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.

#### **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 at an installation:
  - 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.

#### **40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)**

- 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 40 CFR §82.106.
  - b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
  - c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
  - d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §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 of 40 CFR Part 82:

- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
  - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §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 40 CFR §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 contained 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,

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

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

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

- 1) Record Keeping
  - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
  - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
  - a) All reports shall be submitted to the Air Pollution Control Program, 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.
  - 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)**

If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

**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 day 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 permit, 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 Adam Uecker, Plant Manager. 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 B**  
**VOC Tracking Sheet**

VOC Tracking sheet as required by Construction Permit 112015-002.

<b>Material Used<sup>1</sup></b> <b>(Name, Type: Solvent / Ink / Extender)</b>	<b>Amount Used</b> <b>(gal)</b>	<b>Density<sup>2</sup></b> <b>(lb/gal)</b>	<b>Overall Control<sup>3</sup></b> <b>(%)</b>	<b>VOC Content<sup>4</sup></b> <b>(%)</b>	<b>VOC Emissions</b> <b>(tons)</b>
<b>Emission Source</b>	<b>Amount Combusted</b> <b>(MMscf)</b>	<b>Emission Factor (lb/MMscf)</b>			<b>VOC Emissions</b> <b>(tons)</b>
Natural Gas Combustion <sup>5</sup>		5.5			
<b>Monthly Start-Up, Shutdown, and Malfunction VOC Emissions<sup>6</sup>:</b>					
<b>Monthly VOC Emissions (ton/month):</b>					

<b>Date</b> <b>(Month/Year)</b>	<b>12-Month Rolling Total</b> <b>VOC Emissions (ton/yr)<sup>7</sup></b>

<b>Date</b> <b>(Month/Year)</b>	<b>12-Month Rolling Total</b> <b>VOC Emissions (ton/yr)</b>

<sup>1</sup> All VOC containing materials used by EP-03, EP-04, EP-06, EP-07, EP-08B, EP-09B, Vianord EVO4 Incremental Processor, and Laser Scoring  
<sup>2</sup> From the SDS for the material. If specific gravity is provided instead, the density can be obtained by multiplying the specific gravity by 8.33.  
<sup>3</sup> Use a capture efficiency of 85% and a control device efficiency of 98% for emission units controlled by the oxidizers. A higher efficiency may be used if a recent stack test approved by the Compliance/Enforcement Unit yield higher efficiencies. For emission units not controlled by the oxidizers assume a control efficiency of 0%.  
<sup>4</sup> From the SDS for the material. If a range of VOC contents is provided, the highest value in the range shall be used to demonstrate compliance.  
<sup>5</sup> This includes all natural gas combusted by CD2, CD3, EP-08A, EP-09A, and the natural gas-fired heating units.  
<sup>6</sup> As reported to the Air Pollution Control Program's Compliance/Enforcement section for compliance with 10 CSR 10-6.050.  
<sup>7</sup> The sum of the most recent 12 months Monthly Rolling VOC Emissions (ton/month). The permittee is in compliance if the 12-Month Rolling Total VOC Emissions are less than 250 tons/year.

**Attachment C**  
 Formaldehyde Tracking Sheet

Formaldehyde Tracking sheet as required by Construction Permit 112015-002.

Material Used <sup>8</sup> (Name, Type: Solvent / Ink / Extender)	Amount Used (gal)	Density <sup>9</sup> (lb/gal)	Overall Control <sup>10</sup> (%)	Formaldehyde Content <sup>11</sup> (%)	Formaldehyde Emissions (tons)
Emission Source	Amount Combusted (MMscf)	Emission Factor (lb/MMscf)		Formaldehyde Emissions (tons)	
Natural Gas Combustion <sup>12</sup>		0.075			
<b>Monthly Start-Up, Shutdown, and Malfunction VOC Emissions<sup>13</sup>:</b>					
<b>Monthly Formaldehyde Emissions (ton/month):</b>					

Date (Month/Year)	12-Month Rolling Total Formaldehyde Emissions (ton/yr) <sup>14</sup>

Date (Month/Year)	12-Month Rolling Total Formaldehyde Emissions (ton/yr)

<sup>8</sup> All formaldehyde containing materials used by EP-03, EP-04, EP-06, EP-07, EP-08B, EP-09B, Vianord EVO4 Incremental Processor, and Laser Scoring  
<sup>9</sup> From the SDS for the material. If specific gravity is provided instead, the density can be obtained by multiplying the specific gravity by 8.33.  
<sup>10</sup> Use a capture efficiency of 85% and a control device efficiency of 98% for emission units controlled by the oxidizers. A higher efficiency may be used if a recent stack test approved by the Compliance/Enforcement Unit yield higher efficiencies. For emission units not controlled by an oxidizer assume a control efficiency of 0%.  
<sup>11</sup> From the SDS for the material. If a range of formaldehyde content is provided, the highest value in the range shall be used to demonstrate compliance.  
<sup>12</sup> This includes all natural gas combusted by CD2, CD3, EP-08A, EP-09A, and the natural gas-fired heating units.  
<sup>13</sup> As reported to the Air Pollution Control Program’s Compliance/Enforcement section for compliance with 10 CSR 10-6.050.  
<sup>14</sup> The sum of the most recent 12 months Monthly Rolling Formaldehyde Emissions (ton/month). The permittee is in compliance if the 12-Month Rolling Total Formaldehyde Emissions are less than 2.0 tons/year.

**Attachment D**

Base Materials from Construction Permit 112015-002

The following are materials originally submitted with Construction Permit 112015-002's application. If the permittee uses materials different than what is listed in this Attachment, they will follow the requirements in Permit Condition PW004.

Inks	Extenders	Vehicles
FLEXO LAMIALL II WHITE	FLEXO LAMIALL II EXTENDER	SYNERGY G BASE LETDOWN VEHICLE 006RR
FLEXO LAMIALL II WHITE WM	POLYTECH G EXTENDER	POLYTECH G LETDOWN VEHICLE
NXT WHITE	SYNERGY G BASE EXTENDER 007RR	SYNERGY III PROCESS LETDOWN VEH30
POLYTECH G PROCESS BLACK	VERSAFILM ULTRA SURFACE PROCESS EXTENDER	VERSA F HIGH HR VEHICLE 35
POLYTECH GLOSS WHITE	VERSA F HIGH HR EXTENDER RE2*644PR	VERSAFILM SURFACE PROC VEHICLE 30 RE-2
ROTOFLEX G B/S NAPTHOL 146	POLYTECH G 6609 EXTENDER	VERSAFILM SURFACE PROC VEHICLE 30 RE-2
ROTOFLEX G CYAN BLUE BASE 673PR		POLYTECH G 6609 LDV
ROTOFLEX G G/S YELLOW CO-1		
EXP3211 WHITE RE-4		
SYNERGY PROCESS BLACK RE-1		
ROTOFLEX RHODAMINE BASE		
ROTOFLEX QUINACRIDONE BASE		
VERSA F HIGH HR WHITE*555PR		
ROTOFLEX G Y/S NAPTHOL RED BASE		
ROTOFLEX G CARBOZOLE VIOLET BASE		
ROTOFLEX G CYAN GREEN BASE		
FLEXO POLYTECH 872 REAL GOLD		
ROTOFLEX G ORANGE BASE		
ROTOFLEX G SPECIAL BLACK BASE		
WARM RED		
SYNERGY PANTONE® 872 REAL GOLD		
ROTOFLEX G G/S YELLOW CO-		
SYNERGY PROCESS CYAN RE-1		
ROTOFLEX G SPECIAL HR YELLOW		
ROTOFLEX G METHYL VIOLET		
ROTOFLEX G B/S NAPTHOL 146		
POLYTECH BLACK		
ROTOFLEX G PROCESS YELLOW BASE (OT)		
ROTOFLEX G PROCESS WARM RED BASE (OT)		
ROTOFLEX G PROCESS VIOLET BASE (OT)		
SYNERGY PROCESS B/S NAPTHOL RE-1		
SYNERGY PROCESS YELLOW WM		
VERSAFILM SURFACE PROCESS BLACK WMI		



Inks	Extenders	Vehicles
VERSAFILM SURFACE PROCESS YELLOW WM		
SYNERGY PROCESS BLACK WM RE-1		
EXP3211 WHITE RE-4		
ROTOFLEX G PROCESS B/S NAPTHOL		
VERSAFILM SURFACE PROCESS CYAN RE-2		
VERSAFILM SURFACE PROC B/S NAPTHOL RE2		
INNOVA WHITE RE-3		
POLYTECH HI-RUB/GLOSS WHITE		

**Attachment E**  
CAM Plan

# **Compliance Assurance Monitoring Plan for Catalytic and Thermal Oxidizers**

prepared for

**TC Transcontinental Packaging – Capri 2  
Catalytic and Thermal Oxidizers CAM Plan – Capri 2  
Clinton, Missouri**

**Project No. 84855**

**Revision 2  
2/8/2017**

prepared by

**Burns & McDonnell Engineering Company, Inc.  
Kansas City, Missouri**

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## 1.0 Introduction

Based on the potential emissions, Transcontinental Capri 2 is considered a major source under Title V of the 1990 Clean Air Act, because potential emissions of volatile organic compounds (VOC) exceed the 100 tons per year (tpy) threshold. A summary of the significant emission sources located at the Transcontinental Capri 2 facility are shown in Table 1-1 and a summary of the control devices is shown in Table 1-2.

**Table 1-1: Controlled Emissions Sources**

<b>Emission Unit</b>	<b>Description of Source</b>
EP06	Flexopress #4 (controlled by catalytic oxidizer CD2)
EP07	Flexopress #5 (controlled by catalytic oxidizer CD2)
EP08B	Flexopress #6 (controlled by thermal oxidizer CD3)
EP09B	Flexopress #7 (controlled by thermal oxidizer CD3)

**Table 1-2: Emission Control Devices**

<b>Control Device</b>	<b>Description of Control</b>
CD2	Catalytic oxidizer #2 (CD2)
CD3	Regenerative thermal oxidizer #3 (CD3)

The flexopresses emit VOC through their printing process. The inks used to print labels contain VOC, which evaporates when the inks are applied to the packaging. Some of the inks that contain VOC are reclaimed and sent offsite to be distilled for future use. The facility has the potential to emit VOC in excess of the Title V major source thresholds. However, this potential is based on maximum operation of the printing presses and assumes that no VOC is reclaimed.

By definition, a Compliance Assurance Monitoring (CAM) Plan is required for each pollutant specific emission unit that meets all three requirements listed below:

1. Is subject to an emission limitation or standard
2. Uses a control device to achieve compliance
3. Has pre-control emissions that exceed or are equivalent to the major source (100 tpy) threshold.

Transcontinental has elected to take a facility-wide limitation on VOC emissions to remain under Prevention of Significant Deterioration (PSD) major source threshold (less than 250 tpy). In doing so, the facility becomes subject to an emissions limitation (Requirement 1). To meet this emissions limitation, the facility uses two oxidizers to reduce VOC emissions (Requirement 2). Each of the four flexopresses has the potential to emit VOC

above 100 tons per year prior to control (Requirement 3). Since all three requirements are met for the emission units, a CAM Plan is required.

The facility has recordkeeping in place to monitor the amount of VOC emitted so that the Capri 2 facility remains below the established emission limit. The following sections define the CAM Plan for each oxidizer used at the facility.

## 2.0 CAM Plan – Catalytic Oxidizer (CD2)

This section provides background information on the Catalytic Oxidizer, CD2, to which the CAM Plan rules apply. Existing monitoring requirements and quality assurance/quality control procedures are discussed.

### Emission Units

Description: Flexopresses #4 and #5  
Identification: Emission Point CD2  
Stack Designation: Catalytic Oxidizer  
Facility: TC Transcontinental Capri 2

### Applicable Regulations and Emissions Limits

Regulation Number: Permit  
Regulated Pollutant: VOC  
Emission Limit: 98% VOC destruction

## 2.1 Monitoring Approach

The TC Transcontinental Capri 2 facility is a printing operation that operates multiple flexographic printing presses. Flexopresses #4 and #5 are controlled by catalytic oxidizer CD2 that achieves 98 percent destruction of VOC. The casing around the flexopresses and the operation of the casings at a negative pressure allow for the vendor to guarantee a capture efficiency of 85 percent of the VOC emitted. Therefore, the estimated overall control efficiency of the catalytic oxidizer for VOC emissions is 83 percent.

In order for the oxidizer to achieve the 98 percent destruction of VOCs, the oxidizer must maintain the combustion chamber temperatures in accordance with unit's design and the most recent Air Pollution Control Program approved stack test. The oxidizer must also maintain 85 percent capture efficiency of VOCs from the flexographic printing presses.

Flexopresses #4 and #5 do not have totally enclosed sections. However, the presses are operated at negative pressure through exhaust piping with exhaust fans and oxidizer fans placed at the ends of the system. The fans route emissions from the presses to the catalytic oxidizer. The vendor guarantees 85 percent capture, though it is likely significantly higher. Therefore, operating the oxidizer fans will ensure capture efficiency exceeds 85 percent.

## **2.2 Performance Indicator**

The combustion temperature of the catalytic oxidizer was selected as the performance indicator because it is suggestive of the oxidizer's operation. If the catalyst bed temperature decreases significantly, complete combustion may not occur.

It has been shown that the control efficiency achieved by the catalytic oxidizer is a function of its operating temperature. By maintaining the operating temperature at or above the minimum established operating temperature, a sufficient level of control efficiency can be expected to be achieved. The operating temperature must also remain below 1000°F in order to avoid deterioration of the catalyst.

The work practice standard comprised of an annual inspection, semi-annual thermocouple replacement, and annual tuning of the catalytic oxidizer, was selected because an inspection verifies equipment integrity and periodic tuning and thermocouple replacement will maintain proper burner operation and efficiency.

### **2.2.1 Indicator Range**

The selected indicator range for the combustion temperature is as follows:

A one-hour average operating temperature less than or equal to the three-hour average operating temperature observed during the most recent Air Pollution Control Program approved stack test is an excursion. A three-hour average operating temperature less than the three-hour average operating temperature observed during the most recent Air Pollution Control Program approved stack test is an exceedance.

An instantaneous operating temperature of greater than 950°F is considered an excursion. An instantaneous operating temperature of greater than 1000°F is considered an exceedance. According to the manufacturer specifications, the oxidizer should not exceed 1000°F in order to avoid degradation of the catalyst.

When an excursion occurs corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required to correct the situation. Furthermore if the temperature drops below 400°F, the flexographic printing press operation will be curtailed automatically. All excursions and exceedances will be documented and reported. The selected Quality Improvement Plan (QIP) threshold is one excursion per 5 percent of the total operating time (maximum of 219 excursions per 6 months if operated 24 hours per day). If the QIP threshold is exceeded in a semiannual reporting period, a QIP will be developed and implemented. This QIP threshold is supported by 6 months of monitoring data following the performance test.

The air permit for the facility (Construction Permit Number 112015-002) requires the oxidizer to maintain a 98 percent destruction efficiency. To ensure this destruction efficiency the oxidizer is assisted by a natural gas-fired auxiliary burner, and the temperature controller is set to maintain this operating temperature.

Review of historical monitoring data indicates that the operating temperature for the oxidizer can be maintained on a regular basis. Annual inspections help confirm that the oxidizer achieves the required destruction efficiency.

**Table 2-1: CD2 CAM Plan Parameters**

Parameter	Monitoring Approach
Indicator	Combustion Temperature
Measurement Approach	Thermocouple
Indicator Range	<p>A one-hour average operating temperature less than or equal to the three-hour average operating temperature observed during the most recent Air Pollution Control Program approved stack test is an excursion. A three-hour average operating temperature less than the three-hour average operating temperature observed during the most recent Air Pollution Control Program approved stack test is an exceedance.</p> <p>An instantaneous operating temperature of greater than 950°F is considered an excursion. An instantaneous operating temperature of greater than 1000°F is considered an exceedance.</p>
Data Representativeness	<p>The thermocouple monitors the temperature of the catalytic oxidizer combustion chamber. Stack testing is required to establish the three-hour average catalytic oxidizer operating temperature at which the catalytic oxidizer complies with the 98 percent destruction efficiency requirement. Information supplied by the catalyst vendor indicates that the maximum operating temperature should not exceed 1000°F, operation at higher temperature will harm the catalyst and reduce destruction efficiency.</p>
Quality Assurance	<p>There are redundant thermocouples and the thermocouples will be replaced semi-annually. The thermocouples shall have an accuracy of 1% of the temperature being measured.</p>
Monitoring Frequency	Once every 15 minutes (more frequent samples can be used)
Data Collection	Data acquisition system
Averaging Period	<p>The data acquisition system shall record each 15-minute data point. Each 15 minute data point shall be compared to the maximum operating temperature indicator. The data acquisition system shall also reduce the 15-minute data points to 1-hour and 3-hour rolling averages which shall be compared to the minimum operating temperature indicator.</p>
Reporting	<p>Reporting will include summary information on the number, duration, and cause of any excursions or exceedances. Catalytic oxidizer and thermocouple downtime shall be reported on a semi-annual basis.</p>
QIP Threshold	<p>The QIP threshold will be no more than one hourly excursion per 5 percent of operating time (219 per 6 months).</p>



### **2.3 Corrective Actions**

TC Transcontinental will respond to and take corrective action in the event of an excursion or exceedance. Corrective actions may include inspection and tuning of the oxidizer to achieve the required combustion temperature. As part of the rule, owners and operators of the subject emissions units are required to submit monitoring reports with the required compliance certifications to the MDNR semi-annually. Semi-annual reports will be submitted to the MDNR, which will include summary of the number, duration, and cause of excursions and exceedances, and the corrective actions taken by TC Transcontinental.

### **3.0 CAM Plan – Regenerative Thermal Oxidizer (CD3)**

This section provides background information on the Regenerative Thermal Oxidizer, CD3, to which the CAM Plan rules apply. Existing monitoring requirements and quality assurance and quality control procedures are discussed.

#### Emission Units

Description: Flexopresses #6 and #7  
Identification: Emission Point CD3  
Stack Designation: Thermal Oxidizer  
Facility: TC Transcontinental Capri 2

#### Applicable Regulations and Emissions Limits

Regulation Number: Permit  
Regulated Pollutant: VOC  
Emission Limit: 98 percent VOC destruction

### **3.1 Monitoring Approach**

The TC Transcontinental Capri 2 facility is a printing operation that operates multiple flexographic printing presses. Flexopresses #6 and #7 are controlled by regenerative thermal oxidizer CD3 that achieves 98 percent destruction of VOC. The casing around the flexopresses and the operation of the casings at a negative pressure allow for the vendors to guarantee capture 85 percent of the VOC emitted. Therefore, the estimated overall control efficiency of the thermal oxidizer for VOC emissions is 83 percent.

Construction Permit 102010-008A requires temperature monitoring of the thermal oxidizer combustion chamber and two media beds and reports the highest temperature from those three locations. The oxidizer is required to maintain the temperature bed above 1,600°F per Special Condition 2.C. In order for the oxidizer to achieve the minimum destruction of VOCs, it must maintain the combustion chamber temperatures in accordance with the construction permit requirements. The oxidizer must also maintain 85 percent capture efficiency of VOCs from the flexographic printing presses.

Flexopresses #6 and #7 have totally enclosed sections. The permanent total enclosures completely surround the sources such that all VOC emissions are contained and directed to the CD3 control device. The presses are operated at negative pressure through exhaust piping with exhaust fans and oxidizer fans placed at the ends of the system. The fans route emissions from the presses to the thermal oxidizer. Environmental Protection Agency (EPA) guidance provides that 100 percent capture could be assumed for these types of enclosures. However, the

vendor guarantees 85 percent capture, and though it is likely significantly higher, capture efficiency will be at a minimum of 85 percent at all times.

### **3.2 Performance Indicator**

The combustion chamber of the thermal oxidizer was selected because it is indicative of the oxidizer's operation (combustion occurring within the chamber). If the chamber temperature decreases significantly, complete combustion may not occur. In addition to the combustion chamber, Construction Permit 102010-008A requires temperature monitoring of the thermal oxidizer's two media beds. The highest of the three temperature will be recorded.

It has been shown that the control efficiency achieved by the regenerative thermal oxidizer is a function of its operating temperature. By maintaining the operating temperature at or above a minimum temperature, a level of control efficiency can be expected to be achieved. The operating temperature must also remain below 1950°F in order to avoid deterioration of the thermal oxidizer.

The work practice comprised of an annual inspection, semi-annual thermocouple replacement, and annual tuning of the regenerative thermal oxidizer, was selected as the performance indicator because an inspection suggests equipment integrity and periodic tuning of the oxidizer and replacement of the thermocouple will maintain proper burner operation and efficiency.

#### **3.2.1 Indicator Range**

The selected indicator range for the combustion chamber and media bed temperatures are as follows:

A one-hour average operating temperature less than or equal to 1600°F is considered an excursion. A three-hour average operating temperature less than 1600°F is considered is an exceedance.

When an excursion occurs corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required to correct the situation. All excursions and exceedances will be documented and reported. The selected QIP threshold is one excursion per 5 percent of the total operating time (maximum of 219 excursions per 6 months if operated 24 hours per day). If the QIP threshold is exceeded in a semiannual reporting period, a QIP will be developed and implemented. This QIP threshold is supported by 6 months of monitoring data following the performance test.

The air permit for the facility, Construction Permit Number 112015-002, requires the oxidizer to maintain a 98 percent destruction efficiency. To achieve this destruction efficiency, the oxidizer is assisted by a natural gas-fired auxiliary burner; the temperature controller is set to maintain the operating temperature.

Review of historical monitoring data indicates that the operating temperature for the oxidizer can be maintained on a regular basis. The performance test from March 29, 2011, confirmed that the oxidizer achieved the required destruction efficiency. During this performance test, the oxidizer was operating above the required operating temperature of 1,600°F.

**Table 3-1: CD3 CAM Plan Parameters**

Parameter	Monitoring Approach
Indicator	Combustion Temperature
Measurement Approach	Thermocouple
Indicator Range	A one-hour average operating temperature less than or equal to 1600°F is considered an excursion. A three-hour average operating temperature less than 1600°F is considered is an exceedance.
Data Representativeness	The thermocouple monitors the temperature of the thermal oxidizer combustion chamber and two media beds and reports the highest temperature from those three locations. Stack testing conducted on March 29, 2011 indicates that at a three-hour average operating temperature of 1600°F the RTO achieves a VOC DRE of 98.88%.  Information supplied by the oxidizer vendor indicates that the maximum operating temperature should not exceed 1950°F.
Quality Assurance	There are redundant thermocouples and the thermocouples will be replaced semi-annually. The thermocouples shall have an accuracy of 1% of the temperature being measured.
Monitoring Frequency	Once every 15 minutes (more frequent samples can be used)
Data Collection	Data acquisition system
Averaging Period	The data acquisition system shall record each 15-minute data point. The data acquisition system shall reduce the 15-minute data points to 1-hour and 3-hour rolling averages which shall be compared to the minimum operating temperature indicator.
Reporting	Reporting will include summary information on the number, duration, and cause of any excursions or exceedances. Catalytic oxidizer and thermocouple downtime shall be reported on a semi-annual basis.
QIP Threshold	The QIP threshold will be no more than one hourly excursion per 5 percent of operating time (219 per 6 months).

### 3.3 Corrective Actions

TC Transcontinental will respond to and take corrective action in the event of an excursion or exceedance. Corrective actions may include inspection and tuning of the oxidizer to achieve the required combustion temperature. As part of the rule, owners and operators of the subject emissions units are required to submit

monitoring reports with the required compliance certifications to the MDNR semiannually. Semiannual reports will be submitted to the MDNR, which will include summary of the number, duration, and cause of excursions and exceedances, and the corrective actions taken by TC Transcontinental.

## STATEMENT OF BASIS

### INSTALLATION DESCRIPTION

TC Transcontinental Packaging – Capri 2 (previously known as Schreiber Foods – Capri 2) is a flexographic printing facility that produces cheese wrappers. The installation used to be a synthetic minor source under an intermediate permit for Volatile Organic Compounds (VOC), but is now a major source of VOC after a new addition in Construction Permit 112015-002. This facility now requires a Part 70 permit.

In some of the previous operating permits TC Transcontinental Packaging – Capri 1 (ID: 083-0033) and TC Transcontinental Packaging – Capri 2 (ID: 083-0046) were permitted together. The installations do share a common SIC code and some common management, but the two installations are not adjacent to one another and do not support one another; therefore, the installations are viewed as two separate facilities with two separate potentials to emit (PTEs) for permitting purposes.

### Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) <sup>15</sup>
PM <sub>10</sub>	0.54
PM <sub>2.5</sub>	0.54
Sulfur Oxides (SO <sub>x</sub> )	0.04
Nitrogen Oxides (NO <sub>x</sub> )	7.12
Volatile Organic Compounds (VOCs)	< 250.0
Carbon Monoxide (CO)	5.98
Hazardous Air Pollutants (HAPs) <sup>16</sup>	< 2.71
Formaldehyde (500-00-0)	< 2.0

<sup>15</sup> Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted. For VOC and formaldehyde, permit condition PW001 and PW002 limit their potential to emit. An overall control efficiency of 83.3% was taken in account for HAP-VOC emissions because use of the oxidizers is required.

<sup>16</sup> Potential HAPs takes in account the formaldehyde emission limitation from permit condition PW002. Individual HAPs below 0.5 ton/hr are not listed.

**Reported Air Pollutant Emissions, tons per year**

<b>Pollutants</b>	<b>2015</b>	<b>2014</b>	<b>2013</b>	<b>2012</b>	<b>2011</b>
Particulate Matter ≤ Ten Microns (PM <sub>10</sub> )	0.07	0.06	0.07	0.06	0.06
Particulate Matter ≤ 2.5 Microns (PM <sub>2.5</sub> )	0.07	0.06	0.07	0.06	0.06
Sulfur Oxides (SO <sub>x</sub> )	0.01	0.01	0.01	0.00	0.00
Nitrogen Oxides (NO <sub>x</sub> )	0.89	0.85	0.88	0.77	0.81
Volatile Organic Compounds (VOC)	71.48	69.89	67.45	57.30	44.72
Carbon Monoxide (CO)	0.74	0.71	0.74	0.65	0.68
Hazardous Air Pollutants <sup>17</sup> (HAPs)	--	--	--	--	--
Ammonia (NH <sub>3</sub> )	0.03	0.03	0.03	0.02	0.03

**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 August 1, 2016
- 2) 2015 Emissions Inventory Questionnaire, received March 22, 2016
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition
- 4) Construction Permit 112015-002, issued November 2, 2015
- 5) Construction Permit 102010-008A, Issued July 29, 2013
- 6) Construction Permit 102010-008, Issued October 18, 2010
- 7) Construction Permit 072003-019, Issued June 3, 2003
- 8) Construction Permit 0996-018, Issued September 26, 1996

**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.

<sup>17</sup> HAPs are below the reporting threshold in the EIQ.

### **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 to this installation and has not been applied within this permit. The installation is in an ozone attainment area.

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

The facility is exempt from this rule. Most of the equipment is exempt per 10 CSR 10-6.220(1)(L) due to being fueled only by natural gas or emits only within a building space per 10 CSR 10-6.220(1)(O). The remaining equipment only emits VOC where visible emissions are not expected.

#### 10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions*

The facility combusts natural gas with its combustion equipment, thus it is exempt via 10 CSR 10-6.261(1)(A).

### **Construction Permit History**

#### Construction Permit 112015-002, Issued November 2, 2015

This permit is for the installation of EP-09 Flexopress #7 and EP-09A Drying Oven #7.

- Special Condition 1A states the conditions of this permit supersedes Special Condition 3A from 102010-008A.
- Special Condition 2 requires use and maintenance of the RTO. It has been added to this permit.
- Special Condition 3A limits VOC emissions plant-wide and has been added to this permit. Special Condition 3B, which limited the amount of formaldehyde, was not included because the application requested the emission limitation as a plant wide emission instead. Thus, the more stringent condition in PW001 was added, and Special Condition 3B was removed due to being redundant. Special Condition 3C requires a tracking sheet be developed for VOC and formaldehyde and has been incorporated into Attachments B and C.
- Special Condition 4 gives guidelines if an alternate material is being considered. It has been added to this permit.
- Special Condition 5 contains stack testing procedures for if the installation decides to conduct testing. See Permit Condition 002.
- Special Condition 6 requires solvents to be sealed when not in use. It has been added to this permit.
- Special Condition 7 adds recordkeeping and reporting requirements.

#### Construction Permit 102010-008A, Issued July 29, 2013

This permit is for the installation of EP-08A Drying Oven #6, EP-08B Flexopress #6, and CD3 Regenerative Thermal Oxidizer #1. Amendment A corrects errors in the project PTE and revises the special conditions.

- Special Condition 1 states the special conditions of 102010-008A supersede all those of 102010-008 and Special Conditions 1 and 2 of 0996-018.
- Special Condition 2 has requirements to use and maintain the RTO. It has been added to this permit.



- Special Condition 3 limits emissions of VOC and formaldehyde as well as establishes compliance requirements for developed forms, and ways to take credit for VOC content in the solvent reclaim. Special Condition 3A has been superseded by Construction Permit 112015-002. Special Condition 3D was excluded to being repeated in Construction Permit 112015-002. The rest of Special Condition 3 has been added to this permit.
- Special Condition 4 contains standards to follow if the facility plans to use alternate materials. In order to streamline this permit, it has not been included due to being repeated in a more recent construction permit.
- Special Condition 5 contains stack testing procedures for if the installation decides to conduct testing. See Permit Condition 002.
- Special Condition 6 requires proper solvent storage when not in use. In order to streamline this permit, it has not been included due to being repeated in a more recent construction permit.
- Special Condition 7 includes recordkeeping requirements.

Construction Permit 102010-008, Issued October 18, 2010

This permit is for the construction of a new flexographic printing press and regenerative thermal oxidizer (RTO).

- All special conditions have been superseded by Construction Permit 102010-008A.

Construction Permit 072003-019, Issued June 3, 2003

This permit is for the installation of EP-6 Flexopress #4, EP-7 Flexopress #5, and CD2 Catalytic Oxidizer #2. The construction permit refers to these as EP-01 and EP-02.

- Special Condition 1 requires use and maintenance of the catalytic oxidizer. It is included in this permit.
- Special Condition 2 has requirements with clean-up of used solvents. To streamline this permit, it has not been included due to being repeated in a more recent construction permit.

Construction Permit 0996-018, Issued September 26, 1996

This permit is for a plate making system.

- Special Conditions 1 and 2 were superseded by 102010-008A.
- Special Condition 3 applies to Special Conditions 1 and 2 and thus was excluded from the permit.
- Special Condition 4 is already applied within this permit as it has repeated in a more recent construction permit.
- Special Condition 5 was not included because the odor requirements can already be found in Section IV: Core Permit Requirements.
- Special Condition 6 was for testing low solvent inks and was concluded in October 1997. Thus this condition no longer applies and was not added to this permit.

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

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

This rule is not applicable to the installation and has not been applied within this permit. The installation does not operate rotogravure printing presses and; therefore, does not meet the applicability requirements of §60.430

40 CFR Part 60, Subpart FFF, *Standards of Performance for Flexible Vinyl and Urethane Coating and Printing*

This rule is applicable to rotogravure printing lines used to print or coat flexible vinyl or urethane products that commenced construction, modification, or reconstruction after June 18, 1983. The flexographic printing press is not subject to Subpart FFF as it is not a printing press designed for printing or coating flexible vinyl or urethane.

**Maximum Achievable Control Technology (MACT) Applicability**

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

This rule is not applicable to the installation and has not been applied within this permit. The installation is an area source of HAPs, and, therefore, does not meet the applicability requirements of §63.820(a)(1).

40 CFR Part 63, Subpart JJJJ, *National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating*

This rule is not applicable to the installation and has not been applied within this permit. The installation is an area source of HAPs and, therefore, does not meet the applicability requirements of §63.3290.

40 CFR Part 63, Subpart HHHHHH, *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*

This rule is not applicable to the installation and has not been applied within this permit. The installation does not strip paint using methylene chloride (75-09-2), refinish autobodies, or spray apply coatings; therefore, the installation does not meet the applicability requirements of §63.1170(a).

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability**

40 CFR Part 61 Subpart M, *National Emission Standards for Asbestos* is applicable to the installation and has been applied within this permit (see Section IV. Core Permit Requirements).

**Compliance Assurance Monitoring (CAM) Applicability**

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

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

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

40 CFR Part 64 is applicable to the oxidizers. See Attachment E for the CAM Plan.

**Greenhouse Gas Emissions**

Note that this source may be subject to the Greenhouse Gas Reporting Rule. However, the preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 permits operating permits at this time. In addition, Missouri regulations do not require the installation to report CO<sub>2</sub> emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO<sub>2</sub> emissions were not included within this permit. The applicant is required to report the data directly

to EPA. The public may obtain CO<sub>2</sub> emissions data for this installation by visiting <http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html>.

### **Other Regulatory Determinations**

10 CSR 10-6.170, *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*  
This rule is applicable to the installation. The installation has the potential to emit only 0.54 tons of PM per year (0.12 lb/hr) and is assumed to always be in compliance with this regulation while being properly maintained and operated. Thus, no monitoring, recordkeeping, or reporting conditions are included.

10 CSR 10-6.405, *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used For Indirect Heating*

This rule is not applicable to the installation. This facility only combusts natural gas with its combustion equipment, it is thus exempt per 10 CSR 10-6.405(1)(E).

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

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

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

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

## Response to Public Comments

The draft Part 70 operating permit renewal for Bemis Packaging, Inc. was placed on public notice May 19, 2017 for a 30-day comment period. The public notice was published on the Department of Natural Resources' Air Pollution Control Program's web page at: <http://dnr.mo.gov/env/apcp/permit-public-notices.htm>. Comments were received from the EPA on June 7, 2017. The comments will be addressed within this Response to Public Comments document.

### Public Comment #1:

Initial Compliance requirement 1., in Permit Condition 002, requires the permittee to "complete performance testing on CD2" (Natural Gas-Fired Catalytic Thermal Oxidizer #2) "within 180 days of permit issuance." Permit Condition 002 appears to incorporate special conditions from Permit to Construct #072003-019, issued June 3, 2003; and Permit to Construct #112015-002, issued November 2, 2015. However, none of the five (5) initial compliance requirements specify and reference the origin of and authority for each term and condition as required by 10 CSR 10-6.065(6)(C)1. A. (I). Therefore, it is unclear whether it is the issuance of this operating permit, or the issuance of one of the construction permits, that starts the 180-day clock for completion of the performance testing. If this performance test is required by one of the referenced construction permits, then this requirement may not be applicable. EPA recommends MDNR clarify which permit initiates the 180-day performance test.

### MoDNR Response to Comment #1:

The Initial Compliance conditions in Permit Condition 002 are requirements made by this operating permit, not by Construction Permits #072003-019 or #112015-002. CD2 has not been tested yet since its installation in 2003. As a result, MoDNR believes it to be important that the requirement to test CD2 be included in this operating permit to assure that CD2 meets its destruction efficiency requirements established in Construction Permit #072003-019. To provide clarity where this operating permit requirement comes from, MoDNR has edited Permit Condition 002 to state that the authority to require testing comes from 10 CSR 10-6.065(6)(C)1.C.(I)(b).

### Public Comment #2:

Permit Condition 002 does not indicate what action(s) the permittee is required to undertake following completion of the performance testing. EPA suggests MDNR elaborate on what the expectations are for the permittee with the results of the performance test.

### MoDNR Response to Comment #2:

Initial Compliance Requirement 6 has been added to Permit Condition 002 indicating MoDNR's expectations if CD2 was to fail to meet its operating limitations after testing.

### Public Comment #3:

Initial Compliance requirement 5. [in Permit Condition 002], requires the test report fully account for all operational and emission parameters addressed in both permit conditions as well as in any other state or

federal rules or regulations. This requirement is too vague to be enforceable as a practical matter, and EPA recommends MDNR specify exactly which two (2) permit conditions are the "both" to be addressed by this performance test.

**MoDNR Response to Comment #3:**

Initial Compliance requirement 5 in Permit Condition 002 has been reworded to provide clarity.

**Public Comment #4:**

It is apparent that CD2 (Natural Gas-Fired Catalytic Thermal Oxidizer #2) and CD3 (Natural Gas-Fired Regenerative Thermal Oxidizer #1) are critical air pollution control devices for the permittee to achieve volatile organic compound (VOC) emission limitation. However, it appears that the permittee is required to only conduct an initial performance test on CD2. EPA encourages MDNR to exercise the authority provided in 10 CSR 10-6.065(6)(C) 1. C. (I) (b) and require the permittee to conduct periodic testing of both CD2 and CD3 to assure continuous compliance; at least once during the term of this operating permit.

**MoDNR Response to Comment #4:**

It is MoDNR's opinion that thermal oxidizers have a lifespan of around 20 years before the destruction efficiency of thermal oxidizers begin to fail. In order to make sure CD2 meets its destruction efficiency requirements established in Construction Permit #072003-019, MoDNR found it important to test CD2 due to its older age (installed in 2003) and because MoDNR does not have records of stack testing previously done on CD2. CD3 was installed around 2010 and last tested in 2011. Because of its younger age, MoDNR is not (presently) concerned about CD3 meeting its operating requirements established in Construction Permit #112015-002 and thus still considers the 2011 stack testing to be reflective of current operation of CD3. In conclusion, MoDNR believes that only CD2 needs testing and requiring retesting of CD3 is (presently) unnecessary during the term of this operating permit.

**Public Comment #5:**

Permit Condition 001 incorporates applicable special conditions from Permit to Construct #072003-019, issued June 3, 2003; Permit to Construct #102010-008A, issued July 29, 2013; and Permit to Construct #112015-002, issued November 2, 2015. However, the Permit to Construct #112015-002 is not listed as a "Permit Reference Document" in the Statement of Basis. EPA encourages MDNR to consider adding Permit to Construct #1120156-002 to the list of Permit Reference Documents in the Statement of Basis in the final draft operating permit.

**MoDNR Response to Comment #5:**

Construction Permit #112015-002 has been added to the list of Permit Reference Documents in the Statement of Basis.

**Public Comment #6:**

"Use of Alternate Material Requirement 1.", in Permit Condition PW004, says that "when considering using an alternate material, the permittee shall calculate the potential emission of each individual HAP using a maximum design rate of 0.36 tons/hr of ink." The draft operating permit cites Permit to Construct #112015-002 Special Condition 4.A. as the authority for this permit condition term. As written, EPA believes this requirement is too vague to be enforceable as a practical matter. Special Condition 4.A., in Permit to Construct #112015-002, says "when considering using an alternate material that is different than a material listed in the Application for Authority to Construct, Transcontinental Capri 2 shall calculate the potential emissions of each individual HAP using a maximum hourly design rate of 0.36 tons of ink per hour." Special Condition 4.A. provides a greater level of enforceability, in that it refers to a list in the construction permit application. However, the list of materials used by the permittee to establish its voluntary volatile organic compound (VOC) emission limit is not available in the operating permit for compliance verification. EPA strongly recommends MDNR consider including the list of materials from the Application to Construct for Permit to Construct #112015-002.

**MoDNR Response to Comment #6:**

Use of Alternate Material Requirement 1 of Permit Condition PW004 has been reworded to increase enforceability which includes a new attachment. Attachment D lists the materials submitted with Construction Permit 112015-002's application.

**Public Comment #7:**

"Use of Alternate Material requirement 3. ", in Permit Condition 004, requires the permittee to seek approval from the Air Pollution Control Program, if the potential emissions of any individual hazardous air pollutant (HAP), from any new alternate material is equal to or greater than the Screening Model Action Level (SMAL). EPA also suggests MDNR consider adding the list of HAP SMAL's as an attachment to the final draft operating permit.

**MoDNR Response to Comment #7:**

MoDNR finds it sufficient enough to supply a link to the most up-to-date list of SMAL levels from MoDNR's website for Use of Alternative Material Requirement 3 of Permit Condition PW004.

## **Public Notice Email to Applicant**

Use the following text for the body of the public notice email. Include a pdf of the draft permit. The subject line should read –

**Draft Part 70 Operating Permit for TC Transcontinental Packaging - Capri 2, Project No. 2016-08-004**

The Air Pollution Control Program (APCP) has completed the preliminary review of your Part 70 operating permit. We are placing a public notice draft permit on the Department's web page at: <http://dnr.mo.gov/env/apcp/permit-public-notices.htm>. The public notice period will start on **<insert date>**, and will last for 30 calendar days.

We will accept comments regarding the draft permit postmarked on or before the closing date. It is very important that you read and understand this legal document. It is your responsibility to comply with this document. Please address comments or recommendations for changes to Michael Stansfield, P.E., Operating Permits Unit, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

A copy of this draft has also been sent to the U.S. EPA's Region VII office in Lenexa, Kansas, for their review. The Region VII office is afforded, by law, oversight authority on any Title V permit which Missouri (or any of the other states in the region) may propose to issue. A public hearing may be held if interest is expressed by the public.

Should you have any questions, or wish clarification on any items in this draft permit, please contact Michael Stansfield at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention.

## **Public Notice Email to Affected States and Indian Tribes**

Use the following text for the body of the public notice email. The subject line should read –

### **Affected States Review for TC Transcontinental Packaging - Capri 2**

In accordance with Missouri State Rule 10 CSR 10-6.065(6)(F)2. and the Clean Air Act this email is to notify you of public notice of the preliminary draft and request for comments for:

TC Transcontinental Packaging - Capri 2, located in Clinton, MO 64735

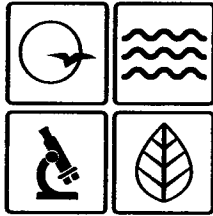
Project Number – 2016-08-004

A public notice draft permit will be available on the Department's web page no later than **November 25, 2014**, at: <http://dnr.mo.gov/env/apcp/permit-public-notices.htm>. The public notice period will start on **November 25, 2014**, and will last for 30 calendar days.

You are invited to submit any relevant information, materials, and views in support of or in opposition to the draft operating permits by no later than **December 26, 2014**, to the attention of Michael J. Stansfield, Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102. Comments may be emailed to [apcppermitpn@dnr.mo.gov](mailto:apcppermitpn@dnr.mo.gov)

Should you require further information or documentation on this matter, please contact the Operating Permits Unit 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. Thank you for your time and attention.





Missouri Department of dnr.mo.gov

# NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

AUG 23 2017

Mr. Adam Uecker  
TC Transcontinental Packaging - Capri 2  
1801 N. Gerhart Dr.  
Clinton, MO 64735

Re: TC Transcontinental Packaging - Capri 2, 083-0046  
Permit Number: OP2017-064

Dear Mr. Uecker

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.

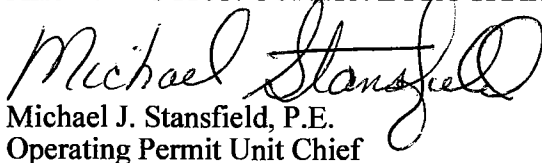
This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request 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

MJS:kwj

Enclosures

c: PAMS File: 2016-08-004

