



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: OP2012-002
Expiration Date: FEB 06 2017
Installation ID: 201-0003
Project Number: 2011-03-014

Installation Name and Address

Tetra Pak Materials LP
2200 East Malone Ave.
Sikeston, MO 63801
Scott County

Parent Company's Name and Address

Tetra-Pak, Inc.
333 West Wacker Dr.
Chicago, IL 60606

Installation Description:

Tetra Pak Materials LP manufactures paperboard milk cartons. The installation is a major source of Volatile Organic Compounds (VOCs). The majority of VOC emissions comes from inks and solvents associated with the installation's fractional presses.

FEB 07 2012

Effective Date

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Tetra Pak Materials LP manufactures paperboard milk cartons. The installation is a major source of Volatile Organic Compounds (VOCs). The majority of VOC emissions come from inks and solvents associated with the installation's fractional presses.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2010	2009	2008	2007	2006
Carbon Monoxide (CO)	0.24	0.22	-	-	0.53
Ammonia (NH ₃)	0.002	0.001	-	-	0.003
Nitrogen Oxides (NO _x)	0.29	0.26	-	-	0.67
Condensable Particulate Matter (PM CON)	0.02	0.01	-	-	-
Filterable Particulate Matter ≤ Ten Microns (PM ₁₀)	0.01	0.005	-	-	-
Filterable Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.01	0.005	-	-	-
Primary Particulate Matter ≤ Ten Microns (PM ₁₀)	-	-	-	-	0.07
Primary Particulate Matter ≤ 2.5 Microns (PM _{2.5})	-	-	-	-	0.05
Sulfur Oxides (SO _x)	0.002	0.002	-	-	0.004
Volatile Organic Compounds (VOC)	23.65	19.21	27.12	31.23	33.01
Hazardous Air Pollutants (HAPs)	0.03	0.03	-	-	-
Styrene (100-42-5)	0.02	0.02	-	-	-
Methanol (67-56-1)	0.01	0.01	-	-	-
Glycol Ethers (20-10-0)	0.003	-	-	-	-
Xylene (1330-20-7)	0.003	0.004	-	-	-
Ethylbenzene (100-41-4)	0.001	0.001	-	-	-

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.

Emission Unit	Description
E-05	Standard Fractional Press (E) Oven, Dryer, & Preheater
E-10	Flame Sealer (E) Stack
E-12	Mini-Fractional Press (E) Preheater Stack
E-16	Standard Fractional Press (F) Oven, Dryer, & Preheater

EMISSION UNITS WITHOUT LIMITATIONS

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

Emission Unit	Description
E-01	Standard Fractional Press (A) Oven, Dryer, & Preheater
E-01-E-10, E-12, & E-16	Clean Up Solvents
E-02	Standard Fractional Press (B) Oven, Dryer, & Preheater
E-03	Standard Fractional Press (C) Oven, Dryer, & Preheater
E-04	Standard Fractional Press (D) Oven, Dryer, & Preheater
E-06	Flame Sealer (A) Stack
E-07	Flame Sealer (B) Stack
E-08	Flame Sealer (C) Stack
E-09	Flame Sealer (D) Stack
E-11	Scrap Blower/Shredder
E-13	Space Heaters
E-14	Processing Photo Polymer Printing Plates
T-01	6,000 gallon Acetate Storage Tank
T-02	3,000 gallon Alcohol Storage Tank
INS-01	Solvent Metal Cleaning - Parts Washer
INS-02	Skive Unit

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.

PERMIT CONDITION PW001

10 CSR 10-6.060 Construction Permits Required
Construction Permit 012005-013, Issued January 28, 2005

Emission Limitation:

1. Special Condition 1.B:
 - a) The permittee shall emit less than ten tons of each individual HAP from the entire installation in any consecutive 12-month period.
 - b) The permittee shall emit less than 25 tons of combined HAPs from the entire installation in any consecutive 12-month period.

Operational Limitation:

Special Condition 2: The permittee shall keep each ink, solvent, and cleaning solution in a sealed container whenever the materials are not in use. The permittee shall provide and maintain suitable, easily read, permanent markings on each ink, solvent, and cleaning solution container.

Monitoring/Recordkeeping:

1. Special Condition 1.C: The permittee shall use Attachment C or an equivalent form generated by the permittee to demonstrate compliance. The permittee shall retain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all HAP-containing materials used at the installation.
2. Records may be kept in either written or electronic form.

Reporting:

1. Special Condition 1.D: The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which records indicate an exceedance of either of the HAP emission limitations.
2. The permittee shall report any deviations from the emission limitations, operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certifications required by Section V of this permit.

PERMIT CONDITION PW002

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart KK – National Emission Standards for the Printing and Publishing Industry

Emission Limitations:

1. The permittee shall:
 - a) Use less than ten tons per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, and [§63.820(a)(2)(i)]
 - b) Use less than 25 tons per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing and publishing. [§63.820(a)(2)(i)]
2. If the permittee chooses to become a major source of HAP, the permittee shall notify the Administrator of such change. [§63.820(a)(6)]
 - a) The permittee shall continue to comply with the HAP usage provisions of §63.820(a)(2) until the source is in compliance with all relevant requirements for affected sources located at major HAP sources under this subpart. [§63.820(a)(6)(i) and (ii)]

Recordkeeping:

1. The permittee shall maintain records of all required measurements and calculations needed to demonstrate compliance with the emission limitations, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis. [§63.829(d)]
2. The permittee shall use Attachment C or an equivalent form generated by the permittee.
3. The permittee shall retain Material Safety Data Sheets (MSDS) for all HAP-containing materials used at the installation.
4. The permittee shall retain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.
5. Records may be kept in either written or electronic form.

Reporting:

1. The permittee shall submit the following reports to the Administrator: [§63.830(b)]
 - a) An initial notification required in §63.9(b). [§63.830(b)(1)]
 - i) Initial notifications for new and reconstructed sources shall be submitted as required by §63.9(b). [§63.830(b)(1)(ii)]
 - ii) For the purpose of this subpart, a Title V or Part 70 permit application may be used in lieu of the initial notification required under §63.9(b), provided the same information is contained in the permit application as required by §63.9(b), and the State to which the permit application has been submitted has an approved operating permit program under Part 70 of this chapter and has received delegation of authority from the EPA. [§63.830(b)(1)(iii)]
 - iii) Permit applications shall be submitted by the same due dates as those specified for the initial notifications. [§63.830(b)(1)(iv)]
2. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which records indicate an exceedance of either of the HAP emission limitations.

3. The permittee shall report any deviations from the emission limitations, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certifications required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 001 Emission Units: E-05, E-10, and E-12 10 CSR 10-6.060 Construction Permits Required Construction Permit 1192-020, Issued November 30, 1992	
Emission Unit	Description
E-05	Standard Fraction Press (E) Oven, Dryer, & Preheater
E-10	Flame Sealer (E) Stack
E-12	Mini-Fractional Press (E) Preheater Stack

Monitoring/Recordkeeping:

1. Special Condition 1: Records shall be kept on site for the most recent 60 months of operation that show the tonnage of each raw material used. Records shall contain both the monthly and previous 12-month rolling total. Raw material specifically refers to the inks, adhesives, and ethylene glycol monopropyl ether.
2. The permittee shall use Attachment A or an equivalent form generated by the permittee.
3. Records may be kept in either written or electronic form.
4. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.

Reporting:

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

PERMIT CONDITION 002 E-16 Standard Fractional Press (F) Oven, Dryer, & Preheater 10 CSR 10-6.060 Construction Permits Required Construction Permit 012005-013, Issued January 28, 2005	
Emission Unit	Description
E-16	Standard Fractional Press (F) Oven, Dryer, & Preheater

Emission Limitation:

Special Condition 1.A: The permittee shall emit less than 40 tons of VOCs from EP-16 Standard Fractional Press (F) Oven, Dryer, & Preheater in any consecutive 12-month period.

Monitoring/Recordkeeping:

1. Special Condition 1.C: The permittee shall use Attachment B or equivalent forms generated by the permittee to demonstrate compliance. The permittee shall retain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department

of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all VOC-containing materials used with E-16 Standard Fractional Press (F) Oven, Dryer, & Preheater.

2. Records may be kept in either written or electronic form.

Reporting:

1. Special Condition 1.D: The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which records indicate an exceedance of the VOC emission limitation.
2. The permittee shall report any deviations from the emission limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certifications required by Section V of this permit.

IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

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

promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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

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

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

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

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

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee may be required by the Director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall submit a full paper EIQ to the Air Pollution Control Program by no later than April 1st after the end of each reporting year. The permittee may instead submit a full electronic EIQ via MoEIS by no later than May 1st after the end of each reporting year.
- 5) Emission fees are due by no later than June 1st after the end of each reporting year. The fees shall be payable to the Missouri Department of Natural Resources.
- 6) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the 12-month period immediately preceding the end of the reporting period.
- 7) The permittee shall collect, record, and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

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

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

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.

- d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the Director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and

- c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the Director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

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

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

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

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

- 1) Recordkeeping
 - 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's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
 - iii) Exception. Monitoring requirements which require reporting more frequently than semi-annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit - this includes deviations or Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in Paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

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

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

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

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

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

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

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

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

the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

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

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

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

The permittee may switch inks, solvents, and other additives at any time, provided that the new ink/solvent/additive contains less than or equal to:

HAP	CAS #	Maximum Weight Percent (mass fraction)
Ethylbenzene	100-41-4	0.05
Glycol Ethers	20-10-0	0.01
Manganese Compounds	20-12-2	0.09
Methanol	67-56-1	0.01
Styrene	100-42-5	0.01
Xylene	1330-20-7	0.05
Combined HAPs	-	0.11

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 semi-annually (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, 901 North 5th Street, Kansas City, KS 66101, as well as the Air Pollution Control Program's 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 application 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's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, 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), recordkeeping, 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's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, 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 Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the Air Pollution Control Program as soon as possible after learning of the need to make the change.
 - b) The permit shield shall not apply to these changes.

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

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;

- b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
- c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
- d) The permit shield shall not apply to these changes.

10 CSR 10-6.020(2)(R)12 Responsible Official

The application utilized in the preparation of this permit was signed by Ms. Michelle Dorman, Plant Manager. On September 27, 2011, the Air Pollution Control Program was informed that Mr. Michael Tomaszewski, Plant Manager, is now the responsible official. 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) The Missouri Department of Natural Resources 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) The Missouri Department of Natural Resources 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 C
 Construction Permit 012005-013 HAP Tracking Sheet

HAP Containing Material (Name, Type)	Monthly Usage (tons)	HAP Name: CAS #:		HAP Name: CAS #:		HAP Name: CAS #:		HAP Name: CAS #:		HAP Content (%)	HAP Emissions (tons)
		Content (%)	Emissions (tons)	Content (%)	Emissions (tons)	Content (%)	Emissions (tons)	Content (%)	Emissions (tons)		
HAP Emission Source	Monthly Usage (MMscf)	Emission Factor ¹ (lb/MMscf)	Emissions ² (tons)	Emission Factor ¹ (lb/MMscf)	Emissions ² (tons)						
Natural Gas Combustion										1.9	
		Monthly Emissions:		Monthly Emissions:		Monthly Emissions:		Monthly Emissions:		Monthly Emissions:	

¹Emission Factor taken from AP-42 for Process SCC 10500106.
²Emission (tons) = Monthly Usage (MMscf) x Emission Factor (lb/MMscf) x 0.0005 (ton/lb)

STATEMENT OF BASIS

Permit Reference Documents

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

- 1) Part 70 Operating Permit Application, received March 3, 2011
- 2) 2010, 2009, 2008, 2007, and 2006 Emissions Inventory Questionnaires
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition
- 4) U.S. EPA's Factor Information Retrieval (FIRE) Date System version 6.25
- 5) Construction Permit 0792-037, Issued July 27, 1992
- 6) Construction Permit 1192-020, Issued November 30, 1992
- 7) No Construction Permit Required Determination, Issued January 16, 1998
- 8) No Construction Permit Required Determination, Issued April 26, 2000
- 9) Construction Permit 012005-013, Issued January 28, 2005

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program 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* is not applicable to the installation and has not been applied within this permit. This regulation applies to installations that emit volatile organic compounds in ozone nonattainment areas. [10 CSR 10-6.100(1)(A)] The installation is located in an ozone attainment area.

10 CSR 10-6.260 *Restriction of Emission of Sulfur Compounds* is not applicable to the installation and has not been applied within this permit. The following emission sources are the only sources of SO_x emissions at the installation and are exempt from this regulation per 10 CSR 10-6.260(1)(A)2 as they combust exclusively pipeline grade natural gas:

Emission Unit	Description
E-01	Standard Fractional Press (A) Oven, Dryer, & Preheater
E-02	Standard Fractional Press (B) Oven, Dryer, & Preheater
E-03	Standard Fractional Press (C) Oven, Dryer, & Preheater
E-04	Standard Fractional Press (D) Oven, Dryer, & Preheater
E-05	Standard Fractional Press (E) Oven, Dryer, & Preheater
E-06	Flame Sealer (A) Stack
E-07	Flame Sealer (B) Stack
E-08	Flame Sealer (C) Stack
E-09	Flame Sealer (D) Stack
E-10	Flame Sealer (E) Stack
E-12	Mini-Fractional Press (E) Preheater Stack
E-13	Space Heaters
E-16	Standard Fractional Press (F) Oven, Dryer, & Preheater

10 CSR 10-6.400 *Restriction of Emission of Particulate Matter from Industrial Processes* is not applicable to the installation and has not been applied within this permit. The installation does contain particulate emission sources; however, every emission unit has potential particulate emissions below 0.5 lb/hr and are exempt per 10 CSR 10-6.400(1)(B)12 (Plantwide potential particulate emissions were calculated to be 0.13 lb/hr).

10 CSR 10-6.405 *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used For Indirect Heating* is not applicable to the installation and has not been applied within this permit. An installation is exempt from this rule if all of the installation's indirect heating sources exclusively combust natural gas. [10 CSR 10-6.405(1)(E)] The only indirect heating source at the installation is E-13 Space Heaters.

Construction Permits

Construction Permit 0792-037, Issued July 27, 1992:

- This de minimis construction permit is for the installation of four natural gas fired burners for drying ink.
- This construction permit contains no special conditions.

Construction Permit 1192-020, Issued November 30, 1992:

- This de minimis construction permit is for the installation of E-05 Standard Fractional Press (E) Oven, Dryer, & Preheater, E-10 Flame Sealer (E) Stack, and E-12 Mini-Fraction Press (E) Preheater Stack.
- Special Condition 1 has been applied within this permit (see Permit Condition 001).
- Special Condition 2 has not been applied within this permit. This condition required all emission control equipment associated with the equipment to be maintained and operated in serviceable condition as prescribed by the manufacturer; however, the emission units do not employ control equipment and never have.

No Construction Permit Required Determination, Issued January 16, 1998:

- This no construction permit required determination is for the installation of a 250 gallon semi-automatic wastewater treatment system which includes a "water washer" batch system and high efficiency sludge dryer.

No Construction Permit Required Determination, Issued April 26, 2000:

- This no construction permit required determination is for the installation of EP-14 Processing Photo Polymer Printing Plates. The determination is based upon a maximum annual processing usage of 20,000 ft², annual usage above 20,000 ft² potentially violates 10 CSR 10-6.060 *Construction Permits Required*.

Construction Permit 012005-013, Issued January 28, 2005:

- This de minimis construction permit is for the installation of E-16 Standard Fractional Press (F) Oven, Dryer, & Preheater.
- Special Conditions 1.A, 1.C, and 1.D have been applied within this permit (see Permit Condition 002).

- Special Conditions 1.B, 1.C, 1.D, and 2 have been applied within this permit (see Permit Condition PW001).

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subparts K, Ka, and Kb – *Standards of Performance for Storage Vessels* are not applicable to the installation and have not been applied within this permit. Subparts K and Ka are only applicable to storage vessels greater than 40,000 gallons in capacity. [§60.110(a) and §60.110a(a)] Subpart Kb is only applicable to storage vessels greater than 75 m³ in capacity. [§60.110b(a)] None of the storage tanks at the installation have a capacity greater less than 75 m³ (19,182 gallons). T-01 is a 6,000 gallon acetate storage tank and T-02 is a 3,000 gallon alcohol storage tank.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63, Subpart T – *National Emission Standards for Halogenated Solvent Cleaning* is not applicable to the installation and has not been applied within this permit. This regulation is applicable to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machines using a solvent containing methylene chloride (75-09-2), perchloroethylene (127-18-4), trichloroethylene (79-01-6), 1,1,1-trichloroethane (71-55-6), carbon tetrachloride (56-23-5), or chloroform (67-66-3). [§63.460(a)] INS-01 Solvent Metal Cleaning – Parts Washer does not use any solvent containing the listed chemicals.

40 CFR Part 63, Subpart KK – *National Emission Standards for the Printing and Publishing Industry* is applicable to the installation and has been applied within this permit (see Permit Condition PW002).

40 CFR Part 63, Subpart JJJJ – *National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating* is not applicable to the installation and has not been applied within this permit. This regulation is applicable to web coating lines at major sources of HAP. [§63.3280] The installation is a minor source of HAP.

40 CFR Part 63, Subpart HHHHHH – *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* is not applicable to the installation and has not been applied within this permit. This regulation applies to area sources conducting paint stripping operations using chemical strippers containing methylene chloride (75-09-2); autobody refinishing operations; or coatings containing compounds of chromium, lead, manganese, nickel, or cadmium which are spray applied to metal and/or plastic parts/products. [§63.11169] The permittee does not use any chemical containing methylene chloride. The permittee does not perform autobody refinishing. The permittee does have coatings (inks) containing manganese compounds; however, the permittee does not use spray application, nor does the permittee coat metal and/or plastic parts/products.

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

Greenhouse Gas Emissions

On May 13, 2010, EPA issued the GHG Tailoring Rule which set the major source threshold for CO₂e to be 100,000 ton/yr within 40 CFR Part 70. As of July 1, 2011 all Title V operating permits are required to include GHG emissions. Potential emissions of greenhouse gases (CO₂e) for this installation are calculated to be 3,723.57 tons, classifying the installation as a minor source of GHGs. Please note that the potential emissions of greenhouse gases from this installation are only for stationary sources as §70.2 defines emission unit as “any part or activity of a stationary source that emits or has the potential to emit any regulated air pollutant or any pollutant listed under Section 112(b) of the Act.”

Other Regulatory Determinations

10 CSR 10-6.170 *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin* is applicable to the installation, but has not been applied within this permit. The installation’s potential emissions of particulate matter were calculated to be 0.59 ton/yr (0.13 lb/hr). As the installation’s potential emissions of particulate matter are quite low, the installation is assumed to always be in compliance with this regulation while being properly maintained and operated; therefore, no further monitoring, recordkeeping, or reporting is required at this time.

10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants* is applicable to the installation, but has not been applied within this permit. The installation does have visible air emissions sources; however, the installation’s potential emissions of particulate matter were calculated to be 0.59 ton/yr (0.13 lb/hr) and is not expected to exceed the opacity limits while being properly maintained and operating. No further monitoring, recordkeeping, or reporting is required at this time.

The determinations made within this permit are based upon the following installation-wide potential emission calculations:

Pollutant	Potential to Emit (ton/yr) ¹
CO	2.31
CO ₂ e	3,723.57
NH ₃	0.01
NO _x	3.10
PM CON	0.18
PM ₁₀	0.59
PM _{2.5}	0.06
SO _x	0.02
VOC	354.20
Combined HAPs	0.34
Manganese Compounds (20-12-2)	0.28
Xylene (1330-20-7)	0.16
Ethylbenzene (100-41-4)	0.16
Hexane (110-54-3)	0.05
Styrene (100-42-5)	0.03
Methanol (67-56-1)	0.03
Glycol Ethers (20-10-0)	0.03

¹Potential emissions are based upon 8,760 hours of uncontrolled annual operation unless otherwise noted:

- Potential emissions from E-01, E-02, E-03, E-04, E-05, and E-16 Standard Fractional Presses are based upon the following worst-case inks/solvents/additives:
 - Aquapak Defoamer with 0.05 weight percent Ethylbenzene and 0.05 weight percent Xylene.
 - Aquapak HAPS Free Silver with 0.11 weight percent Combined HAPs, 0.09 weight percent Manganese Compounds, 0.01 weight percent Glycol Ethers, and 0.01 weight percent Methanol.
 - Aquapak Plus AAOT Yellow with 0.01 weight percent Styrene.
 - Ethyl Acetate with 100 weight percent VOC.
- Potential emissions from E-14 Processing Photo Polymer Printing Plate are based upon the worst case cleaning solvent containing 85 weight percent VOC.

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 Air Pollution Control Program'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 Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Prepared by:

Alana L. Rugen
Environmental Engineer

CERTIFIED MAIL: 70093410000190188711
RETURN RECEIPT REQUESTED

Mr. Michael Tomaszewski
Tetra Pak Materials LP
2200 East Malone Ave.
Sikeston, MO 63801

Re: Tetra Pak Materials LP, 201-0003
Permit Number: **OP2012-002**

Dear Mr. Tomaszewski:

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

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Alana Rugen 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 to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:ark

Enclosures

c: Southeast Regional Office
PAMS File: 2011-03-014