



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: OP2013-056
Expiration Date: AUG 26 2018
Installation ID: 071-0031
Project Number: 2009-01-022

Installation Name and Address

Graphic Packaging International
1101 South Denton Road
Pacific, MO 63069
Franklin County

Parent Company's Name and Address

Graphic Packaging International
1500 Riveredge Parkway
Suite 100
Atlanta, GA 30328

Installation Description:

Graphic Packaging International manufactures folding cartons from paperboard to meet customer specifications and product end use requirements. The cartons undergo printing and drying. The installation also applies adhesives. The installation is a major source of Volatile Organic Compounds (VOC).

AUG 27 2013

Effective Date


Director or Designee
Department of Natural Resources



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Table of Contents

| | |
|--|-----------|
| I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING | 3 |
| II. PLANT WIDE EMISSION LIMITATIONS..... | 5 |
| PERMIT CONDITION PW001 | 5 |
| 10 CSR 10-6.060 Construction Permits Required | |
| Construction Permit 112007-009, Issued November 30, 2007 | |
| Construction Permit 022006-003, Issued February 3, 2006 | |
| Construction Permit 062002-005, Issued June 10, 2002 | |
| Construction Permit 0297-020, Issued February 21, 1997 | |
| III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS | 6 |
| PERMIT CONDITION 001 | 6 |
| 10 CSR 10-5.442 Control of Emissions From Lithographic and Letterpress Printing Operations | |
| IV. CORE PERMIT REQUIREMENTS | 9 |
| V. GENERAL PERMIT REQUIREMENTS..... | 16 |

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Graphic Packaging International manufactures folding cartons from paperboard to meet customer specifications and product end use requirements. The cartons undergo printing and drying. The installation also applies adhesives. The installation is a major source of VOC.

| Reported Air Pollutant Emissions, tons per year | | | | | |
|--|-------------|-------------|-------------|-------------|-------------|
| Pollutants | 2011 | 2010 | 2009 | 2008 | 2007 |
| Particulate Matter \leq Ten Microns (PM ₁₀) | 0.02 | 0.41 | - | - | - |
| Particulate Matter \leq 2.5 Microns (PM _{2.5}) | 0.02 | 0.02 | - | - | - |
| Sulfur Oxides (SO _x) | 0.001 | - | - | - | - |
| Nitrogen Oxides (NO _x) | 0.18 | 0.19 | - | - | - |
| Volatile Organic Compounds (VOC) | 27.80 | 27.47 | 25.78 | 29.68 | 18.58 |
| Carbon Monoxide (CO) | 0.04 | 0.04 | - | - | - |
| Ammonia (NH ₃) | 0.03 | 0.03 | - | - | - |
| Hazardous Air Pollutants (HAP) | 1.22 | 0.44 | 0.68 | 1.72 | 1.16 |
| Glycol Ethers (20-10-0) | 0.79 | 0.07 | 0.12 | 0.11 | 0.05 |
| Hydroquinone (123-31-9) | 0.16 | 0.12 | 0.11 | 0.15 | 0.09 |
| Naphthalene (91-20-3) | 0.13 | - | 0.002 | 0.002 | 0.002 |
| Trichloroethylene (79-01-6) | 0.09 | 0.17 | - | - | - |
| Ethylene Glycol (107-21-1) | 0.02 | 0.01 | 0.03 | 0.97 | 0.52 |
| Acrylic Acid (79-10-7) | 0.01 | 0.001 | - | - | - |
| Isopropylbenzene (98-82-8) | 0.01 | 0.001 | 0.001 | - | - |
| Xylene (1330-20-7) | 0.01 | 0.001 | 0.002 | 0.003 | 0.002 |
| Styrene (100-42-5) | 0.003 | 0.001 | - | - | - |
| Hexane (110-54-3) | 0.001 | 0.03 | 0.003 | - | 0.01 |
| Vinyl Acetate (108-05-4) | - | 0.05 | 0.41 | 0.41 | 0.41 |
| Toluene (108-88-3) | - | - | 0.01 | - | - |
| Hydrogen Chloride (7647-01-0) | - | - | 0.002 | 0.003 | 0.002 |
| Benzene (71-43-2) | - | - | - | 0.06 | 0.03 |
| Cobalt Compounds (20-07-5) | - | - | - | 0.01 | 0.02 |
| Manganese Compounds (20-12-2) | - | - | - | 0.01 | 0.02 |

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 |
|----------------------|--|
| EP-01B | Lithographic Offset Nonheatset Printing - Clean-up Solvents |
| EP-01C | Lithographic Offset Nonheatset Printing - Fountain Solutions |
| IEP-02 | Press Supplies Storage Area |

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 |
|----------------------|--|
| EP-01A | Lithographic Offset Printing - Ink, Varnish, & Coating |
| EP-02 | Adhesive Application - Gluers |
| EP-03 | Paperboard Scrap Handling System |
| EP-04 | Space Heaters |
| EP-05 | Parts Washer Unit |
| EP-07 | Natural Gas-fired Dryer |
| IEP-01 | Die Cutting Operations |

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 112007-009, Issued November 30, 2007
Construction Permit 022006-003, Issued February 3, 2006
Construction Permit 062002-005, Issued June 10, 2002
Construction Permit 0297-020, Issued February 21, 1997

Operational Limitations:

1. Special Condition 1: The permittee shall keep all inks, coatings, solvents, and cleaning solutions in closed containers whenever the materials are not in use. The permittee shall provide and maintain suitable, easily read, permanent markings on all ink, coating, solvent, and cleaning solution containers.
2. Special Condition 2: The permittee shall place used cleaning cloths/rags in closed containers when not in use and while awaiting off-site transport.

Reporting:

The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual 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 CFR and 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 | |
|--|--|
| 10 CSR 10-5.442 Control of Emissions From Lithographic and Letterpress Printing Operations | |
| Emission Unit | Description |
| EP-01B | Lithographic Offset Nonheatset Printing – Clean-up Solvents |
| EP-01C | Lithographic Offset Nonheatset Printing – Fountain Solutions |
| IEP-02 | Press Supplies Storage Area |

Fountain Solutions:

1. 10 CSR 10-5.442(3)(A) applies only to offset lithographic presses with a total fountain solution reservoir capacity of one gallon or more. [10 CSR 10-5.442(3)(A)]
 - a) The permittee shall not use or permit the use of any applicable offset lithographic printing press unless— [10 CSR 10-5.442(3)(A)1]
 - i) For each sheet-fed press with a maximum sheet size greater than 11 inches by 17 inches— [10 CSR 10-5.442(3)(A)1.B]
 - (1) The fountain solution, as applied, contains five percent or less by weight of alcohol; or
 - (2) The fountain solution, as applied, contains 8.5 percent or less by weight of alcohol and is refrigerated to a temperature of 60°F or less; or
 - (3) The fountain solution, as applied, contains five percent or less by weight of alcohol substitutes or a combination of alcohol and alcohol substitutes; and
 - (4) The fountain solution mixing tanks containing alcohol-based solutions are covered; and
 - ii) For each non-heatset web press, the fountain solution, as applied, contains no alcohol and five percent or less by weight of alcohol substitutes. [10 CSR 10-5.442(3)(A)1.C]
 - b) Direct measurement of the alcohol content of the fountain solution, as applied, shall be performed and recorded with a hydrometer, equipped with temperature correction or with readings adjusted for temperature, at least once per day or once per batch, whichever is longer. A standard solution shall be used to calibrate the hydrometer once per month for the type of alcohol used in the fountain. [10 CSR 10-5.442(3)(A)2]
 - c) For fountain solutions, as applied, containing alcohol substitutes or nonalcohol additives and, as an alternative to 10 CSR 10-5.442(3)(A)2, the VOC content shall be established with proper recordkeeping which may include, as necessary to determine compliance, the amount of concentrated substitute added per quantity of fountain water, date of preparation, calculated VOC content of the final solution, or by measurement using EPA Method 24 analysis as outlined in 10 CSR 10-5.442(5)(C)1. For automatic mixing systems, verification and recordkeeping of the mixer settings shall be performed at least once each month. [10 CSR 10-5.442(3)(A)3]
 - d) The fountain solution temperature for each required refrigerated fountain reservoir containing alcohol-based solutions shall be measured at least once per day or once per batch, whichever is longer, by a thermometer or other temperature detection device capable of reading to 0.5°F. [10 CSR 10-5.442(3)(A)4]

Press Cleaning:

1. The permittee shall not use or permit the use of any applicable offset lithographic or letterpress printing press unless— [10 CSR 10-5.442(3)(B)]
 - a) All cleaning solutions, excluding a quantity not to exceed 110 gallons per facility in any 12 consecutive months, shall have a VOC content of 70 percent or less, by weight, or a composite partial vapor pressure less than or equal to 10 mmHg at 20°C; [10 CSR 10-5.442(3)(B)1]
 - b) The cleaning solutions are kept in tightly-covered containers at all times except when being dispensed as needed for cleaning operations; [10 CSR 10-5.442(3)(B)2]
 - c) The used cleaning cloths contaminated with cleaning solutions are placed in tightly- closed containers while awaiting off-site transportation. The cleaning cloths should be properly cleaned and disposed; and [10 CSR 10-5.442(3)(B)3]
 - d) The VOC content or composite partial vapor pressure of the cleaning solution, as applied, shall be established with proper recordkeeping which may include, as necessary to determine compliance, the amount of concentrated cleaning solution added per quantity of water, date of preparation, calculated VOC content, composite partial vapor pressure of the final solution, by measurement using EPA Method 24 analysis as outlined in 10 CSR 10-5.442(5)(C)2, or the formula in 10 CSR 10-5.442(5)(C)3. For automatic blanket wash systems, verification and recordkeeping of the mixer settings shall be performed at least once each month. [10 CSR 10-5.442(3)(B)4]

Test Methods:

The permittee shall refer to 10 CSR 10-5.442(5) for test methods applicable to 10 CSR 10-5.442.

Recordkeeping and Reporting:

1. The permittee shall maintain records as required by 10 CSR 10-5.442(4) sufficient to determine continuous compliance with 10 CSR 10-5.442. These records shall be kept for at least five years or longer if enforcement action is pending. These records shall be available immediately upon request for review by the Department of Natural Resources' personnel and other air pollution control agencies upon presentation of proper credentials. [10 CSR 10-5.442(4)(A)]
2. For each applicable printing press, records shall be maintained to show— [10 CSR 10-5.442(4)(C)]
 - a) For each fountain solution whose VOC content is modified, the calculation or direct measurement data that indicates the resultant VOC content by weight. The calculation or measurement need only be performed once for each batch of fountain solution used except that it need not be performed at all for the dilution of a fountain solution containing alcohol substitutes purchased with less than five percent VOC content before dilution or for alcohol containing fountain solutions requiring refrigeration purchased with less than three percent or 8.5 percent VOC content, for sheet-fed presses. [10 CSR 10-5.442(4)(C)1]
 - b) For each fountain solution, a manufacturer's formulation data sheet or Material Safety Data Sheet (MSDS) listing the physical properties of alcohol or alcohol substitute(s) such as density and percent VOC as purchased from the supplier; [10 CSR 10-5.442(4)(C)2]
 - c) Results of any testing conducted on an emission unit at a regulated facility; [10 CSR 10-5.442(4)(C)3]
 - d) Maintenance records and inspection results of any air pollution control equipment; and [10 CSR 10-5.442(4)(C)4]
 - e) The temperature, as required by 10 CSR 10-5.442(3)(A)1, at least once per day or once per batch, whichever is longer. [10 CSR 10-5.442(4)(C)5]

3. For each lithographic and letterpress printing installation, records shall be maintained to show— [10 CSR 10-5.442(4)(D)]
 - a) An MSDS or manufacturer's formulations data listing the percentage by weight of VOC in the cleaning solution, the composite partial vapor pressure of VOC in the cleaning solution, or the necessary data to make a determination thereof as outlined in 10 CSR 10-5.442(5)(C); [10 CSR 10-5.442(4)(D)1]
 - b) For each cleaning solution whose VOC content is modified, the calculation that indicates the resultant VOC content by weight or composite partial vapor pressure. The calculation need only be performed once for each batch of cleaning solution used except that it need not be performed at all for the dilution of a cleaning solution which does not exceed the VOC limits of 10 CSR 10-5.442(3)(B)1; and [10 CSR 10-5.442(4)(D)2]
 - c) The quantity of all cleaning solution used which does not meet the VOC limits set forth in 10 CSR 10-5.442(3)(B)1 on a 12-consecutive-month basis. [10 CSR 10-5.442(4)(D)3]
4. The director may require other records as reasonable and necessary to carry out the provisions of the Missouri Air Conservation Law. [10 CSR 10-5.442(4)(E)]
5. The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual 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 CFR, the 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, with the following exception:
 - i) St. Louis metropolitan area. The open burning of household refuse is prohibited.
 - b) Yard waste, with the following exception:
 - i) St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed 16 ft². Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities.
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 permittee fails to comply with the conditions or any provisions of the permit.
4. The permittee 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 the permittee 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(2)(N)5, the director shall not issue a permit under this section unless the permittee 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. 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 §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 §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.

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| 10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions |
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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 §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 §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 §§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 18 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 HAP 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 10-6.100 Alternate Emission Limits

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. The permittee shall obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

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

1. The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
2. The permittee may be required by the director to file additional reports.
3. Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
4. The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. §643.079.
5. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
6. The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director.

The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.

7. The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the 12-month period immediately preceding the end of the reporting period.
8. The permittee shall collect, record, and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.180 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 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited

It shall be unlawful to operate any hand-fired fuel-burning equipment in the St. Louis, Missouri metropolitan area. This regulation shall apply to all fuel-burning equipment including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations (Contained in State Implementation Plan)

No person shall burn or cause or permit the burning of refuse in any installation which is designed for the primary purpose of burning fuel.

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

The permittee may not 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 10-5.240 Additional Air Quality Control Measures May be Required When Sources Are Clustered in a Small Land Area

1. The Air Conservation Commission may prescribe more restrictive air quality control requirements that are more restrictive and more extensive than provided in regulations of general application for:
 - a) Areas in which there are one or more existing sources and/or proposed new sources of PM in any circular area with a diameter of two miles (including sources outside metropolitan area) from which the sum of particulate emissions allowed from these sources by regulations of general application are or would be greater than 2000 tons per year or 500 pounds per hour.
 - b) Areas in which there are one or more existing sources and/or proposed new sources of SO₂ in any circular area with a diameter of two miles from which the sum of SO₂ emissions from these sources allowed by regulations of general application are or would be greater than 1000 tons for any consecutive three months or 1000 pounds per 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 Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the 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 40 CFR Part 82, 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 40 CFR Part 82, Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in 40 CFR Part 82, 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 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 CFR and 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 40 CFR 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 10 CSR 10-6.065(6)(C)7.A 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 §112(r)

1. 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 §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:
 - a) June 21, 1999;
 - b) Three years after the date on which a regulated substance is first listed under §68.130; or
 - c) 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)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, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and 40 CFR 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 §303 of the Act or §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 EPA and the Air Pollution Control Program 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

1. 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, 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.

2. §502(b)(10) changes. Changes that, under §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, 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 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, 11201 Renner Blvd., Lenexa, KS 66219, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.

- c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
- d) The permit shield shall not apply to these changes.

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

The application utilized in the preparation of this permit was signed by Mitch McGee, General 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 permittee 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 permittee 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

1. This permit may be reopened for cause if:
 - a) The Missouri Department of Natural Resources receives notice from EPA that a petition for disapproval of a permit pursuant to §70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
 - b) 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,
 - c) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - i) The permit has a remaining term of less than three years;
 - ii) The effective date of the requirement is later than the date on which the permit is due to expire; or
 - iii) 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,
 - d) 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
 - e) 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.

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 January 13, 2009
2. 2011, 2010, 2009, 2008, and 2007 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. Construction Permit 112007-009, Issued November 30, 2007
5. Construction Permit 022006-003, Issued February 3, 2006
6. Construction Permit 062002-005, Issued June 10, 2002
7. Construction Permit 0498-008, Issued March 24, 1998
8. Construction Permit 1097-007, Issued September 26, 1997
9. Construction Permit 0297-020, Issued February 21, 1997

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 10-5.330 *Control of Emissions From Industrial Surface Coating Operations* is not applicable to the installation and has not been applied within this permit. 10 CSR 10-5.330(1)(D)12 exempts printing operations subject to 10 CSR 10-5.442.

10 CSR 10-5.340 *Control of Emissions From Rotogravure and Flexographic Printing Operations* is not applicable to the installation and has not been applied within this permit. The installation only performs lithographic printing.

10 CSR 10-5.370 *Control of Emissions From the Application of Deadeners and Adhesives* is not applicable to the installation and has not been applied within this permit. This regulation applies to the application of automotive underbody deadeners and adhesives. The installation is not part of the automotive industry - the installation's adhesives are applied to paperboard cartons.

10 CSR 10-5.455 *Control of Emissions From Industrial Solvent Cleaning Operations* is not applicable to the installation and has not been applied within this permit. 10 CSR 10-5.445(1)(C)6 states that printing press cleaning operations are not subject to this regulation.

10 CSR 10-5.520 *Control of VOC Emissions From Existing Major Sources* is not applicable to the installation and has not been applied within this permit. The installation is complying with 10 CSR 10-5.442; therefore, they meet the exemption in 10 CSR 10-5.520(1)(A).

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. 10 CSR 10-6.260(1)(A)2 exempts sources that exclusively combust pipeline grade natural gas.

10 CSR 10-6.400 *Restriction of Emission of PM From Industrial Processes* is not applicable to the installation and has not been applied within this permit. 10 CSR 10-6.400(1)(B)12 exempts emission units with potential PM emissions below 0.5 lb/hr – the entire installation has potential PM emissions below 0.5 lb/hr.

10 CSR 10-6.405 *Restriction of PM Emissions From Fuel Burning Equipment Used For Indirect Heating* is not applicable to the installation and has not been applied within this permit. 10 CSR 10-6.405(1)(E) exempts installation that are fueled only by natural gas.

Construction Permits

No Construction Permit Required, Issued October 2, 2008:

- ◆ This no construction permit required is for the replacement of EP-03 Paperboard Scrap Handling System.

Construction Permit 112007-009, Issued November 30, 2007:

- ◆ This de minimis construction permit is for the installation of an eight-color sheetfed, non-heatset, offset lithographic printing press, a new cutter, and a new gluer.
- ◆ Special Conditions 1 and 2 have been applied within this permit (see Permit Condition PW001).

Construction Permit 022006-003, Issued February 3, 2006:

- ◆ This de minimis construction permit is for the installation of an eight-color sheetfed, non-heatset, offset lithographic printing press and two cutters.
- ◆ Special Conditions 1 and 2 have been applied within this permit (see Permit Condition PW001).

Construction Permit 062002-005, Issued June 10, 2002:

- ◆ This general construction permit is for the installation of a seven-color sheetfed, non-heatset, offset lithographic printing press, one sheeter, one cutter, and one adhesive gluer.
- ◆ Special Conditions 1 and 2 have been applied within this permit (see Permit Condition PW001).

Construction Permit 0498-008, Issued March 24, 1998:

- ◆ This de minimis construction permit is for the installation of a one-color flexographic printer and a natural-gas fired dryer.
- ◆ This permit contains no special conditions.

Construction Permit 1097-007, Issued September 26, 1997:

- ◆ This general construction permit is for the installation of a new eight-color offset, sheet-fed, non-heatset lithographic printing press.
- ◆ This permit contains no special conditions.

Construction Permit 0297-020, Issued February 21, 1997:

- ◆ This de minimis construction permit is for the installation of a six-color Komori offset sheet-fed non-heatset printing press and an additional color unit to be added to the existing Planeta RZ printing press.

- ◆ Special Condition 1 applied the odor rule (formerly 10 CSR 10-5.160 which was rescinded and replaced by 10 CSR 10-6.165). 10 CSR 10-6.165 has been applied within Section IV. Core Permit Requirements.
- ◆ Special Condition 2 has been applied within this permit (see Permit Condition PW001).

New Source Performance Standards Applicability

40 CFR Part 60, Subpart QQ – *Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing* is not applicable to the installation and has not been applied within this permit. The installation only performs lithographic printing.

Maximum Achievable Control Technology 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. Although the installation does use trichloroethylene (79-01-6) as a clean-up solvent for their lithographic printing operations, the installation does not operate a batch vapor, in-line vapor, in-line cold, or batch cold solvent cleaning machine.

40 CFR Part 63, Subpart KK – *National Emission Standards for the Printing and Publishing Industry* is not applicable to the installation and has not been applied within this permit. The installation is not a major source of HAP and does not perform rotogravure or flexographic printing operations.

40 CFR Part 63, Subpart JJJJ – *National Emission Standards for HAP: Paper and Other Web Coating* is not applicable to the installation and has not been applied within this permit. The installation is not a major source of HAP.

National Emission Standards for Hazardous Air Pollutants 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 Applicability

40 CFR Part 64, *Compliance Assurance Monitoring*

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 (GHG) Emissions

This installation is a minor source for GHG. The installation's plantwide potential to emit GHG is 5,968.42 tons per year which is less than than 100,000 tons per year GHG major source threshold.

Installation Potential to Emit

| Pollutant | Potential to Emit (tons per year) ¹ |
|------------------|--|
| CO | 0.74 |
| GHG | 5,968.42 |
| HAP | 6.07 |
| NO _x | 3.99 |
| PM ₁₀ | 1.64 |
| SO _x | 0.08 |
| VOC | 160.41 |

¹Potential emissions for all pollutants other than GHG were taken from Construction Permit 112007-009. Potential emissions of GHG were calculated for this project as none were calculated in Construction Permit 112007-009.

Other Regulatory Determinations

10 CSR 10-6.170 *Restriction of PM 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 plantwide potential to emit PM₁₀ is only 1.63 tpy ~ 0.37 lb/hr; therefore, the installation is assumed to always be in compliance with this regulation. PM emission sources are EP-03 Paperboard Scrap Handling System, EP-04 Space Heaters, EP-07 Natural Gas-fired Dryer, and IEP-01 Die Cutting Operations.

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. All of the installation’s PM emission sources have potential emissions below 0.5 lb/hr and are assumed to always be in compliance with this regulation. PM emission sources are EP-03 Paperboard Scrap Handling System, EP-04 Space Heaters, EP-07 Natural Gas-fired Dryer, and IEP-01 Die Cutting Operations.

The installation contains four offset, nonheatset lithographic printing presses:

- ◆ Press #7202 KBA Rapida 142, installed in 2001
- ◆ Press #7204 Komori Lithrone 44, installed in 1996
- ◆ Press #7206 KBA Rapida 162, installed in 2008
- ◆ Press #7208 KBA Rapida 162, installed in 2006

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

Mr. Mitch McGee
Graphic Packaging International
1101 South Denton Road
Pacific, MO 63069

Re: Graphic Packaging International, 071-0031
Permit Number: **OP2013-056**

Dear Mr. McGee:

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 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Alana Rugen at contact the 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: St. Louis Regional Office
PAMS File: 2009-01-022

MEMORANDUM

DATE: June 17, 2013

TO: 2009-01-022, Graphic Packaging International (071-0031)

FROM: Alana L. Rugen, EIT
Environmental Engineer II

SUBJECT: Response to Public Comments

The draft Part 70 Operating Permit for Graphic Packaging International (Project #2009-01-022, County-Plant ID: 071-0031) was placed on public notice as of May 16, 2013, for a 30-day comment period. The public notice was published on the Department's web page at: <http://www.dnr.mo.gov/env/apcp/PermitPublicNotices.htm> on Thursday, May 16, 2013. The Air Pollution Control Program did not receive any comments from either the public or the applicant during the 30-day comment period.

ALR/kjc