

PERMIT BOOK

STATE OF MISSOURI



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number: **052012-018** Project Number: 2012-02-009

Installation Number: 097-0132

Parent Company: Bemis Company, Inc.

Parent Company Address: P.O. Box 669, Neenah, WI 54957

Installation Name: Milprint Packaging LLC

Installation Address: 3210 North Progress, Joplin, MO 64801

Location Information: Jasper County, S30, T28N, R32W

Application for Authority to Construct was made for:

Modification of existing tandem coextrusion laminator JE-1 third deck (EU-15) by adding solvent capability, increased utilization of rotogravure press JR-2 (EU-12) and corona treaters (EU-130). This review was conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

Standard Conditions (on reverse) are applicable to this permit.

Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

MAY 30 2012

EFFECTIVE DATE


DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Department's Air Pollution Control Program of the anticipated date of startup of these air contaminant sources. The information must be made available within 30 days of actual startup. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located within 15 days after the actual startup of these air contaminant sources.

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 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 choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant sources(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

Page No.	3
Permit No.	
Project No.	2012-02-009

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."

Milprint Packaging LLC
Jasper County, S30, T28N, R32W

1. **Superseding Condition**
The conditions of this permit supersede the following special conditions found in the previously issued New Source Review permits issued by the Air Pollution Control Program.
 - A. Permit 022004-008A, Special Condition 2.
 - B. Permit 0198-019, Special Condition 4.

2. **Volatile Organic Compounds (VOC)**
 - A. Milprint Packaging LLC shall emit less than 250.0 tons of VOC in any consecutive 12-month period from all VOC emitting emission units at the installation as defined in Table 4.

 - B. Milprint Packaging LLC shall develop and use forms approved by the Air Pollution Control Program to demonstrate compliance with Special Condition 2.A. The forms shall be submitted to the Air Pollution Control Program's Compliance/Enforcement Section within 15 days of EU-15 modification startup.

 - C. The forms in Special Condition 2.B. shall use 90 percent capture efficiency for emission units not equipped with permanent total enclosure and 100 percent capture efficiency for units with permanent total enclosure. The control (destruction) efficiency shall be obtained from the latest catalytic oxidizer performance testing results. When an emission unit is applying solvent-less coating or material, the VOC capture and control efficiency associated with that emission unit are each zero. For this installation, solvent-less is defined as coatings or materials containing VOC less than 1 percent by weight as applied.

Page No.	4
Permit No.	
Project No.	2012-02-009

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

3. Capture Device Requirement - Permanent Total Enclosure

- A. Except as provided in Special Condition 3.B., Milprint Packaging LLC shall operate each of the emission units listed in Table 1 within a permanent total enclosure such that all emissions associated with the coating operations are captured and exhausted to a catalytic oxidizer (EP-11a, EP-11b, or EP-11c).

Table 1: Emission Units with Permanent Total Enclosures

Emission Unit	Description
EU-15	Tandem Coextrusion Laminator JE-1 3 rd Deck
EU-20	Adhesive Laminator JA-1

- B. Operation of permanent total enclosure is not required during application of solvent-less coatings or materials. Milprint Packaging LLC shall maintain records of all solvent-less coating or materials applied including names, monthly usage amount, date, and time.
- C. Milprint Packaging LLC shall verify within 30 days of the startup of EU-15 for solvent coating that each permanent total enclosure has 100 percent capture efficiency according to the procedures of EPA Test Method 204 *Criteria for and Verification of a Permanent or Temporary Total Enclosure*, set forth in 40 CFR Part 51, Appendix M.
- D. Milprint Packaging LLC shall maintain an operating and maintenance log associated with each permanent total enclosure which shall include the following:
 - 1) Incidents of malfunction, with impact on emissions, time, date and duration of event, probable cause, and corrective actions; and
 - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

4. Control Device Requirement - Catalytic Oxidation

- A. Except as provided in Special Condition 4.B., Milprint Packaging LLC shall control emissions from the emission units listed in Table 2 using catalytic oxidation (EP-11a, EP-11b, or EP-11c) as specified in the permit application.

Page No.	5
Permit No.	
Project No.	2012-02-009

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

Table 2: Emission Units Controlled by Catalytic Oxidation and Capable of Applying Solvent-less Coating

Emission Unit	Description
EU-10	8-Color Flexographic Press JF-1
EU-11	10-Color Rotogravure Press JR-1
EU-12	9-Color Rotogravure Press JR-2
EU-13	Tandem Coextrusion Laminator JE-1 1 st and 2 nd Deck
EU-14	Tandem Extrusion Laminator JE-2
EU-15	Tandem Coextrusion Laminator JE-1 3 rd Deck
EU-20	Adhesive Laminator JA-1

- B. Milprint Packaging LLC may emit directly to the ambient air uncontrolled emissions from emission units in Table 2 during solvent-less coating or material application.
 - C. The catalytic oxidizers shall be operated and maintained in accordance with the manufacturer's specifications, catalyst regeneration or replacement schedule, and operational ranges established in the latest catalytic oxidizer performance test. Milprint Packaging LLC shall continuously monitor each catalytic oxidizer's temperature immediately upstream and downstream of the oxidizer's catalyst bed when any of the emission units in Table 2 are in operation. The operating temperature of each oxidizer shall be recorded at least once every 15 minutes of its operation. The monitoring equipment shall be located such that the Department of Natural Resources' employees may easily observe them.
 - D. Milprint Packaging LLC shall maintain an operating and maintenance log for the catalytic oxidizers which shall include the following:
 - 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
5. Operational Requirement - Solvent/Ink
- A. Milprint Packaging LLC shall keep the inks, solvents, and cleaning solutions in sealed containers whenever the materials are not in use.
 - B. Milprint Packaging LLC shall provide and maintain suitable, easily read, permanent or affixed markings on all VOC and hazardous air pollutant (HAP) containing containers used with this equipment.

Page No.	6
Permit No.	
Project No.	2012-02-009

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

6. Record Keeping and Reporting Requirements
 - A. Milprint Packaging LLC shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used.
 - B. Milprint Packaging LLC shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.
7. Use of Alternative Coating in the TCL 3rd Coating Deck (EU-15)
 - A. When considering using an alternative coating in the TCL 3rd Coating Deck (EU-15) that is different than the material listed in the Application for Authority to Construct, Milprint Packaging LLC shall calculate the potential emissions of all individual HAP in the alternative material.
 - B. Milprint Packaging LLC shall seek approval from the Air Pollution Control Program before use of the alternative material if the potential individual HAP emissions for the alternative material are equal to or greater than the screening model action level (SMAL) for any chemical listed in Appendix A.
 - C. Attachment A or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to show compliance with Special Condition 8.A.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (6) REVIEW

Project Number: 2012-02-009
Installation ID Number: 097-0132
Permit Number:

Milprint Packaging LLC
3210 North Progress
Joplin, MO 64801

Complete: February, 02, 2012

Parent Company:
Bemis Company, Inc.
P.O. Box 669
Neenah, WI 54957

Jasper County, S30, T28N, R32W

REVIEW SUMMARY

- Milprint Packaging LLC has applied for authority to modify the existing tandem coextrusion laminator JE-1 3rd deck by adding solvent capability and increase utilization of rotogravure press JR-2 and corona treaters.
- Hazardous Air Pollutant (HAP) emissions are not expected from the proposed equipment.
- None of the New Source Performance Standards (NSPS) under 40 CFR 60 apply to the installation.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) under 40 CFR 61 apply to this installation.
- 40 CFR 63 (MACT) Subpart KK, *National Emission Standards for the Printing and Publishing Industry*, applies to the tandem coextrusion laminator JE-1 3rd deck (EU-15). See operating permit OP2011-053 for further discussion on applicability.
- Existing catalytic oxidizers (EP-11a, EP-11b, or EP-11c) are being used to control the VOC emissions from the equipment in this permit.
- This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOC from the entire installation are conditioned below the New Source Review major source level.
- This installation is located in Jasper County, an attainment area for all criteria pollutants.

- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.
- Ambient air quality modeling was not performed for this review. No model is currently available which can accurately predict ambient ozone concentrations caused by this installation's VOC emissions.
- Verification of the permanent total enclosures is required.
- An application to amend the Part 70 operating permit is required for this installation within 1 year of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Milprint Packaging LLC is a manufacturer of flexible packaging located in Joplin. Operations include an 8-color flexographic press, a 10-color rotogravure press, an adhesive laminator, a solvent-less adhesive laminator, a 9-color rotogravure press and a tandem coextrusion laminator and multiple gas fired dryers. A parts washer with solvent recovery (distillation) is also present. Printing and coating/lamination of substrates, normally followed by natural gas fired drying is performed. Corona treaters are also used to pretreat substrates. A catalytic oxidizer system is used to control VOC emissions.

The installation is a minor source under New Source Review permits and a major source for VOC under Operating permits. The following New Source Review permits have been issued to Milprint Packaging LLC from the Air Pollution Control Program.

Table 3: Permit History

Permit Number	Description
0198-019	Installation of a new flexible packaging manufacturing facility
032002-020	Installation of a flexographic printing press (equipment was not installed)
122002-001	Water-based VOC-containing materials in the third coating deck/dryer of the tandem coextrusion laminator
022004-008	Installation of an extrusion coater laminator with a natural gas fired dryer and an oxidizer.
022004-008A	Amendment to add installation wide 250 ton per year VOC limit

PROJECT DESCRIPTION

Milprint proposes to modify the existing tandem coextrusion laminator JE-1 third deck (EU-15) by adding solvent capability. This will cause increased utilization of rotogravure press JR-2 (EU-12, EP-6) and corona treaters (EU-130, EP-08D). Milprint has requested confidentiality for EU-15 process rates and materials. This is the public version of the permit. A confidential version is available under project 2012-02-010.

The tandem coextrusion laminator (TCL) 3rd deck will operate at █ linear feet of substrate per hour with a print width of █ inches while applying the solvent coating, or █ reams per hour. The desired solids rate is █ pound per ream. The coating with the lowest solids (non-volatile) weight that yields the greatest required usage and results in the worst case potential VOC emissions was conservatively selected for this review, as provided by the applicant. The coating is █. The coating's non-volatiles are █ weight percent of its mass. Therefore, the coating's maximum hourly application rate is █ pounds per hour. Emissions from this unit during solvent use are controlled by permanent total enclosure routed to the parallel oriented oxidative catalysts. Emissions from the unit during solvent-less use are uncontrolled.

The project will increase utilization of rotogravure press JR-2 from previously attainable hourly process speeds. As submitted by the applicant, the maximum uncontrolled VOC emission rate will continue to be █ pounds per hour. JR-2 emissions are controlled by the oxidative catalysts without permanent total enclosure. The project will increase utilization of the four corona treaters. Maximum hourly design rate remains at █ kilowatts. Corona treater emissions are uncontrolled.

Table 4: Installation VOC Emission Units

Emission Unit	Emission Point	Description
EU-10	EP-01	8-Color Flexographic Press JF-1
EU-11	EP-02	10-Color Rotogravure Press JR-1
EU-20	EP-03	Adhesive Laminator JA-1
EU-100	EP-04	Solvent-less Adhesive Laminator JA-2
EU-110	EP-05	Parts Washer
EU-12	EP-06	9-Color Rotogravure Press JR-2
EU-13	EP-08	Tandem Coextrusion Laminator 1 st and 2 nd Deck
EU-15	EP-08B	Tandem Coextrusion Laminator 3 rd Deck JE-1
EU-14	EP-10	Tandem Extrusion Laminator JE-2
EU-03	EP-11a, EP-11b, EP-11c	VOC Oxidizer System (natural gas combustion)
EU-04	EP-12	Miscellaneous Natural Gas Combustion
N/D	T-1A to T-3B	Above Ground Tank Farm (6 tanks)

N/D = Not Determined

EMISSIONS/CONTROLS EVALUATION

Potential emissions from the solvent usage at the TCL 3rd deck were calculated using mass balance, the material MSDS, and continuous operation (8,760 hours per year). All available VOC were considered emitted. All non-volatiles were considered to become solids on the substrate. There are no HAPs in the █ coating. The permanent total enclosure was assigned 100 percent capture efficiency. The oxidative catalysts were assigned █ percent VOC destruction. Site specific performance testing from 2005 and 2010 shows VOC destruction exceeding █ percent. Testing is scheduled for 2015. Milprint conservatively reports installation VOC emissions using █ percent destruction, not the higher site specific values. Performance testing is not required for this project.

Due to the relatively low annual usage of the rotogravure press JR-2 (less than 500 hours), the potential emissions increase was calculated assuming continuous operation, rather than using a potential minus actuals method. Resulting permit applicability is not affected. Capture efficiency of █ percent and VOC control efficiency of █ percent was cited from permit 0198-019.

Potential emissions from the corona treaters were also calculated using the full design rate. An ozone emission factor of 0.073 pounds per kilowatt hour was selected. The emission factor was supplied by the applicant and has been used in other permits issued by the Air Pollution Control Program for corona treaters. Ozone is a regulated pollutant that has an ambient air quality standard. However, it is typically considered a secondary pollutant that forms from VOC and nitrogen oxides (NO_x). Ozone was the only pollutant considered from the corona treaters.

Potential emissions of the application represent the potential of the new equipment, assuming continuous operation. Existing potential emissions are cited from permits 022004-008, 022004-008A, and OP2011-053. There is no increase in potential HAP emissions from the emission units in this project. The following table provides an emissions summary for this project.

Table 5: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2011 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM	25.0	N/D	N/D	N/A	N/A
PM ₁₀	15.0	7.9	0.22	N/A	N/A
PM _{2.5}	10.0	N/D	0.22	N/A	N/A
SO _x	40.0	0.4	0.02	N/A	N/A
NO _x	40.0	70.3	2.95	N/A	N/A
VOC	40.0	< 250.0	177.59	379.14	< 250.0
CO	100.0	18.5	2.48	N/A	N/A
HAPs	10.0/25.0	< 10.0/25.0	N/D	N/A	< 10.0/25.0
Ozone	¹	N/D	N/D	17.91	N/A

N/A = Not Applicable; N/D = Not Determined

¹ Ozone does not have a de minimis level, however it does have a ambient air quality standard.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOC from the entire installation are conditioned below the New Source Review major source level.

APPLICABLE REQUIREMENTS

Milprint Packaging LLC shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information, 10 CSR 10-6.110*
- *Operating Permits, 10 CSR 10-6.065*
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin, 10 CSR 10-6.170*
- *Restriction of Emission of Visible Air Contaminants, 10 CSR 10-6.220*
- *Restriction of Emission of Odors, 10 CSR 10-6.165*

SPECIFIC REQUIREMENTS

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

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

David Little
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated January 27, 2012, received February 2, 2012, designating Bemis Company, Inc. as the owner and operator of the installation.

Attachment A – Alternative Coating Potential to Emit Compliance Worksheet

Milprint Packaging LLC
 Jasper County, S30, T28N, R32W
 Project Number: 2012-02-009
 Installation ID Number: 097-0132
 Permit Number: _____

This sheet covers the TCL 3rd deck (EU-15) for coating or material name _____ Date _____ Copy this sheet as needed.

(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)
Process and Emission Unit	Individual HAP Name and CAS No.	HAP is also Particulate Matter (yes / no)	Individual HAP Content (maximum weight %)	Coating Non-Volatiles (weight %)	Maximum Hourly Application Rate (pounds coating per hour)	Overall Control Efficiency (%)	Individual HAP PTE (tons per year)	Individual HAP SMAL (tons per year)
<i>(Example) TCL 3rd Deck EU-15</i>	<i>Benzene 71-43-2</i>	<i>no</i>	<i>2.0%</i>	<i>20.39%</i>	<i>796.96</i>	<i>85.5%</i>	<i>10.12</i>	<i>2.0</i>
<i>(Example) TCL 3rd Deck EU-15</i>	<i>Cobalt 2-Ethylhexanoate 136-52-7</i>	<i>yes</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>

- (A) Record the process description and emission unit.
- (B) Record the individual HAPs from this coating/material MSDS.
- (C) Compare the HAP to Appendix A for verification as particulate matter. If the HAP is also particulate matter, and the coating is applied by rolling, the HAP potential emissions (H) are zero.
- (D) Record the maximum weight percent of each HAP from the MSDS.
- (E) Record the coating's non volatile weight % from the MSDS.
- (F) Calculate the coating's maximum hourly application rate by multiplying the maximum reams per hour by the solids rate (lb/ream), divide by the coating's non-volatile percent mass. Example: 162.5 reams/hr x 1 lb solids/ream / (E) = 796.96 pounds coating per hour.
- (G) Calculate the overall control efficiency by multiplying the capture efficiency by the control efficiency. For a permanent total enclosure use 100 percent capture efficiency. Use percent control efficiency for the catalytic oxidizers. For solvent-less coatings use zero percent overall control efficiency.
- (H) Calculate the HAP potential to emit. $(H) = (D) \times (F) \times (1-(G)) \times 8,760 / 2,000$.
- (I) Individual HAP SMAL as reported in Appendix A. If the Individual HAP PTE is equal to or greater than the Individual HAP SMAL, seek approval from the Air Pollution Control Program New Source Review Unit before using this coating.

Appendix A: Table of Hazardous Air Pollutants and Screening Model Action Levels (January 5, 2012 Revision 9)

Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM	Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM	Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM
ACETALDEHYDE	75-07-0	9		Y	N	CARBARYL	63-25-2	10	V	Y	Y	DICHLOROPROPANE, [1,2-]	78-87-5	1		Y	N
ACETAMIDE	60-35-5	1		Y	N	CARBON DISULFIDE	75-15-0	1		Y	N	DICHLOROPROPENE, [1,3-]	542-75-6	1		Y	N
ACETONITRILE	75-05-8	4		Y	N	CARBON TETRACHLORIDE	56-23-5	1		Y	N	DICHLORVOS	62-73-7	0.2		Y	N
ACETOPHENONE	98-86-2	1		Y	N	CARBONYL SULFIDE	463-58-1	5		Y	N	DIETHANOLAMINE	111-42-2	5		Y	N
ACETYLAMINOFLUORINE, [2-]	53-96-3	0.005	V	Y	Y	CATECHOL	120-80-9	5		Y	N	DIETHYL SULFATE	64-67-5	1		Y	N
ACROLEIN	107-02-8	0.04		Y	N	CHLORAMBEN	133-90-4	1		Y	Y	DIETHYLENE GLYCOL MONOBUTYL ETHER	112-34-5	5	P	Y	N
ACRYLAMIDE	79-06-1	0.02		Y	N	CHLORDANE	57-74-9	0.01		Y	Y	DIMETHOXYBENZIDINE, [3,3-]	119-90-4	0.1	V	Y	Y
ACRYLIC ACID	79-10-7	0.6		Y	N	CHLORINE	7782-50-5	0.1		N	N	DIMETHYL BENZIDINE, [3,3-]	119-93-7	0.008	V	Y	Y
ACRYLONITRILE	107-13-1	0.3		Y	N	CHLOROACETIC ACID	79-11-8	0.1		Y	N	DIMETHYL CARBAMOYL CHLORIDE	79-44-7	0.02		Y	N
ALLYL CHLORIDE	107-05-1	1		Y	N	CHLOROACETOPHENONE, [2-]	532-27-4	0.06		Y	N	DIMETHYL FORMAMIDE	68-12-2	1		Y	N
AMINOBIHENYL, [4-]	92-67-1	1	V	Y	N	CHLOROBENZENE	108-90-7	10		Y	N	DIMETHYL HYDRAZINE, [1,1-]	57-14-7	0.008		Y	N
ANILINE	62-53-3	1		Y	N	CHLOROBENZILATE	510-15-6	0.4	V	Y	Y	DIMETHYL PHTHALATE	131-11-3	10		Y	N
ANISIDINE, [ORTHO-]	90-04-0	1		Y	N	CHLOROFORM	67-66-3	0.9		Y	N	DIMETHYL SULFATE	77-78-1	0.1		Y	N
ANTHRACENE	120-12-7	0.01	V	Y	N	CHLOROMETHYL METHYL ETHER	107-30-2	0.1		Y	N	DIMETHYLAMINOAZOBENZENE, [4-]	60-11-7	1		Y	N
ANTIMONY COMPOUNDS		5	H	N	Y	CHLOROPRENE	126-99-8	1		Y	N	DIMETHYLANILINE, [N-N]	121-69-7	1		Y	N
ANTIMONY PENTAFLUORIDE	7783-70-2	0.1	H	N	Y	CHROMIUM (VI) COMPOUNDS		0.002	L	N	Y	DINITRO-O-CRESOL, [4,6-] (Note 6)	534-52-1	0.1	E	Y	Y
ANTIMONY POTASSIUM TARTRATE	28300-74-5	1	H	N	Y	CHROMIUM COMPOUNDS		5	L	N	Y	DINITROPHENOL, [2,4-]	51-28-5	1		Y	N
ANTIMONY TRIOXIDE	1309-64-4	1	H	N	Y	CHRYSENE	218-01-9	0.01	V	Y	N	DINITROTOLUENE, [2,4-]	121-14-2	0.02		Y	N
ANTIMONY TRISULFIDE	1345-04-6	0.1	H	N	Y	COBALT COMPOUNDS		0.1	M	N	Y	DIOXANE, [1,4-]	123-91-1	6		Y	N
ARSENIC COMPOUNDS		0.005	I	N	Y	COKE OVEN EMISSIONS	8007-45-2	0.03	N	Y	N	DIPHENYLHYDRAZINE, [1,2-]	122-66-7	0.09	V	Y	Y
ASBESTOS	1332-21-4	0	A	N	Y	CRESOL, [META-]	108-39-4	1	B	Y	N	DIPHENYLMETHANE DIISOCYANATE, [4,4-]	101-68-8	0.1	V	Y	N
BENZ(A)ANTHRACENE	56-55-3	0.01	V	Y	N	CRESOL, [ORTHO-]	95-48-7	1	B	Y	N	EPICHLOROHYDRIN	106-89-8	2		Y	N
BENZENE	71-43-2	2		Y	N	CRESOL, [PARA-]	106-44-5	1	B	Y	N	ETHOXYETHANOL, [2-]	110-80-5	10	P	Y	N
BENZIDINE	92-87-5	0.0003	V	Y	N	CRESOLS (MIXED ISOMERS)	1319-77-3	1	B	Y	N	ETHOXYETHYL ACETATE, [2-]	111-15-9	5	P	Y	N
BENZO(A)PYRENE	50-32-8	0.01	V	Y	N	CUMENE	98-82-8	10		Y	N	ETHYL ACRYLATE	140-88-5	1		Y	N
BENZO(B)FLUORANTHENE	205-99-2	0.01	V	Y	N	CYANIDE COMPOUNDS		0.1	O	Y	N	ETHYL BENZENE	100-41-4	10		Y	N
BENZO(K)FLUORANTHENE	207-08-9	0.01	V	Y	N	DDE	72-55-9	0.01	V	Y	Y	ETHYL CHLORIDE	75-00-3	10		Y	N
BENZOTRICHLORIDE	98-07-7	0.006		Y	N	DI(2-ETHYLHEXYL) PHTHALATE, (DEHP)	117-81-7	5		Y	N	ETHYLENE GLYCOL	107-21-1	10		Y	N
BENZYL CHLORIDE	100-44-7	0.1		Y	N	DIAMINOTOLUENE, [2,4-]	95-80-7	0.02		Y	N	ETHYLENE GLYCOL MONOBUTYL ETHER (Delisted)	111-76-2				
BERYLLIUM COMPOUNDS		0.008	J	N	Y	DIAZOMETHANE	334-88-3	1		Y	N	ETHYLENE GLYCOL MONOHEXYL ETHER	112-25-4	5	P	Y	N
BERYLLIUM SALTS		2E-05	J	N	Y	DIBENZ(A,H)ANTHRACENE	53-70-3	0.01	V	Y	N	ETHYLENE IMINE [AZIRIDINE]	151-56-4	0.003		Y	N
BIPHENYL, [1,1-]	92-52-4	10	V	Y	N	DIOXINS/FURANS		6E-07	D,V	Y	N	ETHYLENE OXIDE	75-21-8	0.1		Y	N
BIS(CHLOROETHYL)ETHER	111-44-4	0.06		Y	N	DIBENZOFURAN	132-64-9	5	V	Y	N	ETHYLENE THIOUREA	96-45-7	0.6		Y	Y
BIS(CHLOROMETHYL)ETHER	542-88-1	0.0003		Y	N	DIBROMO-3-CHLOROPROPANE, [1,2-]	96-12-8	0.01		Y	N	FORMALDEHYDE	50-00-0	2		Y	N
BROMOFORM	75-25-2	10		Y	N	DIBROMOETHANE, [1,2-]	106-93-4	0.1		Y	N	GLYCOL ETHER (ETHYLENE GLYCOL ETHERS)		5	P	Y	N
BROMOMETHANE	74-83-9	10		Y	N	DIBUTYL PHTHALATE	84-74-2	10		Y	Y	GLYCOL ETHER (DIETHYLENE GLYCOL ETHERS)		5	P	Y	N
BUTADIENE, [1,3-]	106-99-0	0.07		Y	N	DICHLOROBENZENE, [1,4-]	106-46-7	3		Y	N	HEPTACHLOR	76-44-8	0.02		Y	N
BUTOXYETHANOL ACETATE, [2-]	112-07-2	5	P	Y	N	DICHLOROBENZIDENE, [3,3-]	91-94-1	0.2	V	Y	Y	HEXACHLOROBENZENE	118-74-1	0.01		Y	N
BUTYLENE OXIDE, [1,2-]	106-88-7	1		Y	N	DICHLOROETHANE, [1,1-]	75-34-3	1		Y	N	HEXACHLOROBUTADIENE	87-68-3	0.9		Y	N
CADMIUM COMPOUNDS		0.1	K	N	Y	DICHLOROETHANE, [1,2-]	107-06-2	0.8		Y	N	HEXACHLOROCYCLOHEXANE, [ALPHA-]	319-84-6	0.01	F	Y	N
CALCIUM CYANAMIDE	156-62-7	10		Y	Y	DICHLOROETHYLENE, [1,1-]	75-35-4	0.4		Y	N	HEXACHLOROCYCLOHEXANE, [BETA-]	319-85-7	0.01	F	Y	N
CAPROLACTAM (Delisted)	105-60-2					DICHLOROMETHANE	75-09-2	10		N	N	HEXACHLOROCYCLOHEXANE, [DELTA-]	319-86-8	0.01	F	Y	N
CAPTAN	133-06-2	10		Y	Y	DICHLOROPHENOXY ACETIC ACID, [2,4-]	94-75-7	10	C	Y	Y	HEXACHLOROCYCLOHEXANE, [TECHNICAL]	608-73-1	0.01	F	Y	N

Appendix A: Table of Hazardous Air Pollutants and Screening Model Action Levels (January 5, 2012 Revision 9)

Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM	Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM	Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM
HEXACHLOROCYCLOPENTADIENE	77-47-4	0.1		Y	N	NITROSODIMETHYLAMINE, [N-]	62-75-9	0.001		Y	N	TRIMETHYLPENTANE, [2,2,4-]	540-84-1	5		Y	N
HEXACHLOROETHANE	67-72-1	5		Y	N	NITROSOMORPHOLINE, [N-]	59-89-2	1		Y	N	URETHANE [ETHYL CARBAMATE]	51-79-6	0.8		Y	N
HEXAMETHYLENE,-1,6-DISOCYANATE	822-06-0	0.02		Y	N	NITROSO-N-METHYLUREA, [N-]	684-93-5	0.0002		Y	N	VINYL ACETATE	108-05-4	1		Y	N
HEXAMETHYLPHOSPHORAMIDE	680-31-9	0.01		Y	N	OCTACHLORONAPHTHALENE	2234-13-1	0.01	V	Y	N	VINYL BROMIDE	593-60-2	0.6		Y	N
HEXANE, [N-]	110-54-3	10		Y	N	PARATHION	56-38-2	0.1		Y	Y	VINYL CHLORIDE	75-01-4	0.2		Y	N
HYDRAZINE	302-01-2	0.004		N	N	PCB [POLYCHLORINATED BIPHENYLS]	1336-36-3	0.009	X	Y	Y	XYLENE, [META-]	108-38-3	10	G	Y	N
HYDROGEN CHLORIDE	7647-01-0	10		N	N	PENTACHLORONITROBENZENE	82-68-8	0.3		Y	N	XYLENE, [ORTHO-]	95-47-6	10	G	Y	N
HYDROGEN FLUORIDE	7664-39-3	0.1		N	N	PENTACHLOROPHENOL	87-86-5	0.7		Y	N	XYLENE, [PARA-]	106-42-3	10	G	Y	N
HYDROQUINONE	123-31-9	1		Y	N	PHENOL	108-95-2	0.1		Y	N	XYLENES (MIXED ISOMERS)	1330-20-7	10	G	Y	N
INDENO(1,2,3CD)PYRENE	193-39-5	0.01	V	Y	N	PHENYLENEDIAMINE, [PARA-]	106-50-3	10		Y	N						
ISOPHORONE	78-59-1	10		Y	N	PHOSGENE	75-44-5	0.1		Y	N						
LEAD COMPOUNDS		0.01	Q	N	Y	PHOSPHINE	7803-51-2	5		N	N						
LINDANE [GAMMA-HEXACHLOROCYCLOHEXANE]	58-89-9	0.01	F	Y	N	PHOSPHOROUS (YELLOW OR WHITE)	7723-14-0	0.1		N	N	Legend					
MALEIC ANHYDRIDE	108-31-6	1		Y	N	PHTHALIC ANHYDRIDE	85-44-9	5		Y	N	Group ID	Aggregate Group Name				
MANGANESE COMPOUNDS		0.8	R	N	Y	POLYCYLIC ORGANIC MATTER		0.01	V	Y	N	A	Asbestos				
MERCURY COMPOUNDS		0.01	S	N	N	PROPANE SULTONE, [1,3-]	1120-71-4	0.03	Y	Y	Y	B	Cresols/Cresylic Acid (isomers and mixtures)				
METHANOL	67-56-1	10		Y	N	PROPIOLACTONE, [BETA-]	57-57-8	0.1		Y	N	C	2,4 - D, Salts and Esters				
METHOXYCHLOR	72-43-5	10	V	Y	Y	PROPIONALDEHYDE	123-38-6	5		Y	N	D	Dibenzofurans, Dibenzodioxins				
METHOXYETHANOL, [2-]	109-86-4	10	P	Y	N	PROPOXUR [BAYGON]	114-26-1	10		Y	Y	E	4, 6 Dinitro-o-cresol, and Salts				
METHYL CHLORIDE	74-87-3	10		Y	N	PROPYLENE OXIDE	75-56-9	5		Y	N	F	Lindane (all isomers)				
METHYL ETHYL KETONE (Delisted)	78-93-3					PROPYLENIMINE, [1,2-]	75-55-8	0.003		Y	N	G	Xylenes (all isomers and mixtures)				
METHYL HYDRAZINE	60-34-4	0.06		Y	N	QUINOLINE	91-22-5	0.006		Y	N	H	Antimony Compounds				
METHYL IODIDE	74-88-4	1		Y	N	QUINONE	106-51-4	5		Y	N	I	Arsenic Compounds				
METHYL ISOBUTYL KETONE	108-10-1	10		Y	N	RADIONUCLIDES		Note 1	Y	N	Y	J	Beryllium Compounds				
METHYL ISOCYANATE	624-83-9	0.1		Y	N	SELENIUM COMPOUNDS		0.1	W	N	Y	K	Cadmium Compounds				
METHYL METHACRYLATE	80-62-6	10		Y	N	STYRENE	100-42-5	1		Y	N	L	Chromium Compounds				
METHYL TERT-BUTYL ETHER	1634-04-4	10		Y	N	STYRENE OXIDE	96-09-3	1		Y	N	M	Cobalt Compounds				
METHYLCYCLOPENTADIENYL MANGANESE	12108-13-3	0.1	R	N	Y	TETRACHLORODIBENZO-P-DIOXIN,[2,3,7,8]	1746-01-6	6E-07	D,V	Y	Y	N	Coke Oven Emissions				
METHYLENE BIS(2-CHLOROANILINE), [4,4-]	101-14-4	0.2	V	Y	Y	TETRACHLOROETHANE, [1,1,2,2-]	79-34-5	0.3		Y	N	O	Cyanide Compounds				
METHYLENEDIANILINE, [4,4-]	101-77-9	1	V	Y	N	TETRACHLOROETHYLENE	127-18-4	10		N	N	P	Glycol Ethers				
METHYLNAPHTHALENE, [2-]	91-57-6	0.01	V	Y	N	TITANIUM TETRACHLORIDE	7550-45-0	0.1		N	N	Q	Lead Compounds (except elemental Lead)				
MINERAL FIBERS		0	T	N	Y	TOLUENE	108-88-3	10		Y	N	R	Manganese Compounds				
NAPHTHALENE	91-20-3	10	V	Y	N	TOLUENE DIISOCYANATE, [2,4-]	584-84-9	0.1		Y	N	S	Mercury Compounds				
NAPHTHYLAMINE, [ALPHA-]	134-32-7	0.01	V	Y	N	TOLUIDINE, [ORTHO-]	95-53-4	4		Y	N	T	Fine Mineral Fibers				
NAPHTHYLAMINE, [BETA-]	91-59-8	0.01	V	Y	N	TOXAPHENE	8001-35-2	0.01		Y	N	U	Nickel Compounds				
NICKEL CARBONYL	13463-39-3	0.1	U	N	Y	TRICHLOROBENZENE, [1,2,4-]	120-82-1	10		Y	N	V	Polycyclic Organic Matter				
NICKEL COMPOUNDS		1	U	N	Y	TRICHLOROETHANE, [1,1,1-]	71-55-6	10		N	N	W	Selenium Compounds				
NICKEL REFINERY DUST		0.08	U	N	Y	TRICHLOROETHANE, [1,1,2-]	79-00-5	1		Y	N	X	Polychlorinated Biphenyls (Aroclors)				
NICKEL SUBSULFIDE	12035-72-2	0.04	U	N	Y	TRICHLOROETHYLENE	79-01-6	10		Y	N	Y	Radionuclides				
NITROBENZENE	98-95-3	1		Y	N	TRICHLOROPHENOL, [2,4,5-]	95-95-4	1		Y	N						
NITROBIPHENYL, [4-]	92-93-3	1	V	Y	N	TRICHLOROPHENOL, [2,4,6-]	88-06-2	6		Y	N						
NITROPHENOL, [4-]	100-02-7	5	Y	N	N	TRIETHYLAMINE	121-44-8	10		Y	N	Note 1	Notes				
NITROPROPANE, [2-]	79-46-9	1	Y	N	N	TRIFLURALIN	1582-09-8	9		Y	Y		The SMAL for radionuclides is defined as the effective dose equivalent to 0.3 millirems per year for 7 years exposure associated with a cancer risk of 1 in 1 million				

Ms. Jennifer Janssen
Plant Manager
Milprint Packaging LLC
3210 North Progress
Joplin, MO 64801

RE: New Source Review Permit - Project Number: 2012-02-009

Dear Ms. Janssen:

Enclosed with this letter is your public version permit to construct. Please study it carefully. Also, note the special conditions on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions, your new source review permit application and with your amended operating permit is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact David Little, at the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Susan Heckenkamp
New Source Review Unit Chief

SH:dll

Enclosures

c: Southwest Regional Office
PAMS File: 2012-02-009

Permit Number: