

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: **082012-005**

Project Number: 2012-04-052

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:

Second of two phases to install tandem extrusion laminators (JE-3 and JE-4) with dryers, corona treaters, flexographic printing press (JF-2), plastic pellet receiving, regenerative thermal oxidizer, and an emergency generator. The first phase was permit 052012-018. 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.

AUG 13 2012

EFFECTIVE DATE

Handwritten signature of Kyna L Moore in black ink.

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.

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**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 (NSR) permits issued by the Air Pollution Control Program.
  - A. Permit 022004-008A, Special Condition 2.
  - B. Permit 0198-019, Special Condition 4.
  - C. Permit 052012-018, all special conditions
2. **Volatile Organic Compounds (VOC) Emission Limitation**
  - 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 5.
  - 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 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.

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**SPECIAL CONDITIONS:**

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

3. Hazardous Air Pollutant (HAP) Emission Limitation
  - A. Milprint Packaging LLC shall emit less than 10.0 tons individually and less than 25.0 tons combined of HAPs in any consecutive 12-month period from all HAP emitting emission units at the installation as defined in Table 6.
  - B. Milprint Packaging LLC shall develop and use forms approved by the Air Pollution Control Program to demonstrate compliance with Special Condition 3.A. The forms shall be submitted to the Air Pollution Control Program's Compliance/Enforcement Section within 15 days of EU-15 modification startup.
4. Capture Device Requirement – Permanent Total Enclosure
  - A. Except as provided in Special Condition 4.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 laminating, coating, and printing operations are captured and exhausted to the oxidation system (EP-11A, EP-11B, EP-11C, and EP-11D).

Table 1: Emission Units with Permanent Total Enclosures

Emission Unit	Description
EU-15	Tandem Coextrusion Laminator JE-1 3 <sup>rd</sup> Deck
EU-20	Adhesive Laminator JA-1
EU-21	Central Impression Flexographic Printing Press JF-2
EU-22	Tandem Extrusion Laminator JE-3
EU-23	Tandem Extrusion Laminator JE-4

- 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 each individual emission unit in Table 1 that each respective 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.

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**SPECIAL CONDITIONS:**

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

- 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.
  
- 5. Control Device Requirement – Oxidation System
  - A. Except as provided in Special Condition 5.B., Milprint Packaging LLC shall control emissions from the emission units listed in Table 2 using the oxidation system (EP-11A, EP-11B, EP-11C, and EP-11D) as specified in the permit application.

**Table 2: Emission Units Controlled by the Oxidation System and Capable of Applying Solvent-less Material**

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 <sup>st</sup> and 2 <sup>nd</sup> Deck
EU-14	Tandem Extrusion Laminator JE-2
EU-15	Tandem Coextrusion Laminator JE-1 3 <sup>rd</sup> Deck
EU-20	Adhesive Laminator JA-1
EU-21	Central Impression Flexographic Printing Press JF-2
EU-22	Tandem Extrusion Laminator JE-3
EU-23	Tandem Extrusion Laminator JE-4

- 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 total exhaust flow rate in dry standard cubic feet per minute (DSCFM) from all operating emission units in Table 2 shall not exceed the total flow rate capacity in DSCFM of all operating oxidizers in the oxidation system.
  - 1) A list of the individual oxidizers that are in operation shall be continuously monitored and recorded at least once every 15 minutes of operation.
  - 2) A list of the emission units in Table 2 that are in operation and exhausting to the oxidizer system shall be continuously monitored

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### SPECIAL CONDITIONS:

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

- 3) and recorded at least once every 15 minutes of operation.  
Pressure in the common emission unit exhaust shall be continuously monitored and recorded at least once every 15 minutes of operation to verify negative pressure.
- D. Catalytic Oxidizers (EP-11A, EP-11B, and EP-11C)
  - 1) The catalytic oxidizers shall be operated and maintained in accordance with the manufacturer's specifications and operational ranges established in the latest catalytic oxidizer performance test and latest Compliance Assurance Monitoring (CAM) Plan from the installation's operating permit. All specifications and operating ranges shall be kept on site.
  - 2) At least once per calendar year a representative catalyst core sample from the catalyst chamber of each oxidizer shall be analyzed for catalyst activity. Samples respective to a single oxidizer may not be taken within four months of each other. If the analysis indicates the catalyst activity is not sufficient to achieve at least 95.00 percent VOC destruction efficiency, Milprint Packaging LLC shall,
    - a. Raise the oxidizer inlet control temperature to a level that will indicate compliance and retest the VOC destruction efficiency of the oxidizer, or
    - b. Replace the catalyst and retest the VOC destruction efficiency of the oxidizer.
    - c. A report of each sampling event, analysis, and resulting action shall be submitted to the Director within 30 days of the completion of the resulting action. The report must include legible copies of the raw data sheets, analytical instrument laboratory data, and complete calculations.
- E. Regenerative Thermal Oxidizer (RTO) (EP-11D)  
The RTO shall be operated and maintained in accordance with the manufacturer's specifications and operational ranges established in the latest RTO performance test and latest CAM Plan from the installation's operating permit. All specifications and operating ranges shall be kept on site.

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**SPECIAL CONDITIONS:**

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

- F. Milprint Packaging LLC shall maintain an operating and maintenance log for the oxidation system 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.
  
- 6. Operational Requirement – Coating/Ink/Solvent
  - A. Milprint Packaging LLC shall keep the coatings, 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 HAP containing containers used with this equipment.
  
- 7. 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) or Certified Product Data Sheets (CPDS) 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.
  
- 8. Performance Testing
  - A. Milprint Packaging LLC shall conduct initial performance testing on the RTO (EP-11D) according to Methods 1 through 4 and 25A of 40 CFR Part 60, Appendix A, or other methods preapproved by the Air Pollution Control Program. The testing shall demonstrate VOC destruction efficiency of at least 95 percent.
  
  - B. Milprint Packaging LLC shall conduct subsequent performance testing on the RTO according to the latest CAM Plan in the installation's operating permit.

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**SPECIAL CONDITIONS:**

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

- C. The initial test shall be performed within 60 days after achieving the maximum production rate of the installation, but not later than 180 days after initial start-up of Central Impression Flexographic Printing Press JF-2 (EU-21) and shall be conducted at the maximum exhaust flowrate of operated emission units in Table 2. Testing shall be conducted over a range of VOC loading representing the lowest, highest, and normal operating average.
- D. A completed Proposed Test Plan Form (enclosed) must be submitted to the Air Pollution Control Program 30 days prior to the proposed test date so that the Air Pollution Control Program may arrange a pretest meeting, if necessary, and assure that the test date is acceptable for an observer to be present. The Proposed Test Plan may serve the purpose of notification and must be approved by the Director prior to conducting the required emission testing.
- E. Two copies of a written report of the performance test results shall be submitted to the Director within 30 days of completion of any required testing. The report must include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required EPA Method for at least one sample run.
- F. The test report is to fully account for all operational and emission parameters addressed both in the permit conditions as well as in any other applicable state or federal rules or regulations. The test report shall establish operational upper and lower range limits for oxidizer operating temperature (°F), oxidizer inlet and outlet flowrate (DSCFM), exhaust flowrate of each emission unit in Table 2 (DSCFM), and common duct pressure (inches water column). VOC emission rates (pounds per hour) and control efficiency (percent to hundredths decimal) shall be developed for the oxidizer.
- G. If the results of the performance testing show that the VOC control efficiency established Special Condition 8.E. is less than 95.00 percent, then Milprint Packaging LLC shall evaluate what effects these lower control efficiencies would have had on the permit applicability and compliance record keeping (Special Condition 2) of this project. Milprint Packaging LLC shall submit the results of any such evaluation in a construction permit application within 30 days of submitting the Performance Test Results report required in Special Condition 8.D. of this permit.

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**SPECIAL CONDITIONS:**

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

9. Use of Alternative Coating in EU-15, EU-21, EU-22, EU-23
  - A. When considering using an alternative coating, ink, or solvent in EU-15, EU-21, EU-22, or EU-23 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 9.A.

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

Project Number: 2012-04-052  
Installation ID Number: 097-0132  
Permit Number:

Milprint Packaging LLC  
3210 North Progress  
Joplin, MO 64801

Complete: April 16, 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 construct the second of two phases to install tandem extrusion laminators (JE-3 and JE-4) with dryers, corona treaters, flexographic printing press (JF-2), plastic pellet receiving, regenerative thermal oxidizer, and an emergency generator. The first phase was permit 052012-018.
- Hazardous Air Pollutant (HAP) emissions are expected from the combustion of natural gas and diesel.
- 40 CFR 60 Subpart IIII, "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines" applies to the proposed emergency generator.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) under 40 CFR 61 apply to this installation.
- 40 CFR 63 Subpart KK, *National Emission Standards for the Printing and Publishing Industry*, (MACT KK) applies to the installation. However, due to the HAP 10/25 limit, only §63.829(d) (recordkeeping) and §63.830(b)(1) (initial notification) apply. See operating permit OP2011-053 for further discussion on Subpart KK applicability.
- MACT Subpart ZZZZ, *National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, applies to the emergency generator (EU-13).
- Permanent total enclosures routing VOC emissions to the oxidizer system (EP-11) are being used to control JE-3, JE-4, and JF-2.
- 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 and

HAP from the entire installation are conditioned below the NSR major source levels.

- 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. No individual HAP potential emissions exceed the respective screening model action level (SMAL).
- Verification of the permanent total enclosures and performance testing of the regenerative catalytic oxidizer bank is required.
- An application to amend the Part 70 Operating Permit is required for this installation within 1 year of phase 2 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 two tandem coextrusion laminators and multiple gas fired dryers. A parts washer with solvent recovery (distillation) is also present. Extruding, printing, and coating/lamination of substrates, normally followed by natural gas fired drying is performed. Corona treaters are also used to pretreat substrates. An oxidizer system is used to control VOC emissions.

The installation is a minor source under NSR permits and a major source for VOC under Operating Permits. The following NSR 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 JE-1
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
052012-018	Phase 1: Modification of existing tandem coextrusion laminator JE-1 third deck for solvent capability, increased utilization of rotogravure press JR-2

## PROJECT DESCRIPTION

Phase 2 of the project consists of the relocation of emission units from other, out of state Bemis facilities to Joplin and new emission units. Project emission units are listed in Tables 4 and 4A. The two phase projects are considered one for permit applicability. Milprint has requested confidentiality for process rates and materials. This is the public version of the permit. A confidential version is available under project 2012-04-053.

For JF-2, JE-3, and JE-4 the coatings with the solids (non-volatile) weight that yield the greatest required usage and result in the worst case potential VOC emissions were conservatively selected for this review, as provided by the applicant. Solvent cleanup for each JF-2, JE-3, and JE-4 for each coating was estimated at a maximum of ■ gallons per year. JF-2, JE-3, and JE-4 are capable of applying water based solvent-less coating. Phase 2 of the project will not cause increased utilization or debottlenecking of any previously permitted emission units.

Plastic pellets are received almost exclusively by rail. Emissions from receiving and storing the pellets have not previously been permitted for this installation. Total installation capacity is ■ per hour. The pellet storage silos are equipped with filtration for sanitary purposes, but not for air pollution. The filtration was not considered a control device for this review.

New corona treaters are needed for this project to support the printing and coating operations. The three treaters for JE-3 rated at ■ kilowatt hours. The two treaters for JE-4 are rated at ■ kilowatt hours each. All of the corona treaters at the installation have been considered for Phase 1 and Phase 2. Corona treater emissions are uncontrolled.

The extruding, printing, and coating operations also require dryers. Dryers for JE-3 sum to ■ million British thermal units per hour (MMBtu/hr) heat input. Dryers for JE-4 sum to ■ MMBtu/hr heat input. All dryers are fueled by natural gas and considered direct heat. Process heat for JF-2 is electric.

The addition of new VOC emission units will be supported by a new regenerative thermal oxidizer. This will be the fourth oxidizer at the installation. However the previous three are catalytic oxidizers. The new oxidizer is rated at ■ MMBtu/hr heat input and is fueled by natural gas.

An emergency generator is being installed with this project. It is a Caterpillar 3054C compression ignition reciprocating internal combustion engine (CI RICE). The manufacture date is April 24, 2006. It was previously installed at another Bemis facility. It is rated at 72.4 horsepower and 4.12 gallons of diesel per hour. It met Tier 2 emission standards under 40 CFR 89 at the time of manufacture. The engine is subject to MACT Subpart ZZZZ as an existing emergency engine. It is also subject to NSPS Subpart IIII which among other requirements limits fuel sulfur content to 15 parts per million maximum.

The installation and projects are supported by paved haul roads for ink and coating receiving and product shipping. No new ink or coating storage tanks are to be installed under these projects.

Table 4: Project Emission Units

Phase 1: Projects 2012-02-009 Public and 2012-02-010 Confidential. Permit 052012-018		
Emission Unit	Emission Point	Description
EU-15	EP-08B	Tandem Coextrusion Laminator JE-1 3 <sup>rd</sup> Deck
EU-12	EP-06	9-Color Rotogravure Press JR-2
EU-130	EP-08D	Corona Treaters
Phase 2: Projects 2012-04-052 Public and 2012-04-053 Confidential		
EU-21	EP-13	Central Impression Flexographic Printing Press JF-2
EU-22	EP-14	Tandem Extrusion Laminator JE-3
EU-23	EP-15	Tandem Extrusion Laminator JE-4
EU-140	EP-18	Plastic Pellet Rail Receiving
EU-130	EP-14D	Corona Treaters for JE-3
EU-130	EP-15D	Corona Treaters for JE-4
EU-210	EP-14	Natural Gas Fueled Dryers for JE-3
EU-220	EP-15	Natural Gas Fueled Dryers for JE-4
EU-03	EP-11D	Regenerative Thermal Oxidizer (oxidizer #4)
EU-200	EP-16	Caterpillar 3054C Emergency Generator
EU-210	EP-17	Paved haul roads

Phase 1 emission units are existing. Phase 2 emission units are new, except pellet receiving and haul roads are existing and previously not permitted.

Table 4A: Project Extrusion, Coating Maximum Hourly Design Rate (MHDR)

Emission Unit	Substrate Feed Rate feet / minute	Print Width inches	MHDR reams / hour	MHDR pounds of solids / ream	Coating	Non-Volatiles weight %	MHDR pounds coating / hour
EU-21	confidential						
EU-22							
EU-23							

Table 5: 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 <sup>st</sup> and 2 <sup>nd</sup> Deck
EU-15	EP-08B	Tandem Coextrusion Laminator 3 <sup>rd</sup> Deck JE-1
EU-14	EP-10	Tandem Extrusion Laminator JE-2
EU-03	EP-11A, EP-11B, EP-11C, EP-11D	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)
EU-21	EP-13	Central Impression Flexographic Printing Press JF-2
EU-22	EP-14	Tandem Extrusion Laminator JE-3
EU-23	EP-15	Tandem Extrusion Laminator JE-4
EU-210	EP-14	Natural Gas Fueled Dryers for JE-3
EU-220	EP-15	Natural Gas Fueled Dryers for JE-4
EU-200	EP-16	Caterpillar 3054C Emergency Generator

Table 6: Installation HAP Emission Units

Emission Unit	Emission Point	Description
EU-13	EP-08	Tandem Coextrusion Laminator 1 <sup>st</sup> and 2 <sup>nd</sup> Deck
EU-14	EP-10	Tandem Extrusion Laminator JE-2
EU-15	EP-08B	Tandem Coextrusion Laminator 3 <sup>rd</sup> Deck JE-1
EU-20	EP-03	Adhesive Laminator JA-1
EU-03	EP-11A, EP-11B, EP-11C, EP-11D	Oxidizer System (natural gas combustion)
EU-04	EP-12	Miscellaneous Natural Gas Combustion
EU-210	EP-14	Natural Gas Fueled Dryers for JE-3
EU-220	EP-15	Natural Gas Fueled Dryers for JE-4
EU-200	EP-16	Caterpillar 3054C Emergency Generator

### EMISSIONS/CONTROLS EVALUATION

Potential emissions from the solvent based coatings and inks at JF-2, JE-3, and JE-4 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. The HAP methylenebis 4-phenyl isocyanate (MDI) (CAS 101-68-8) is present in a solvent based coating for JE-4, however no MDI emissions were included in this review because of the non-spray application method, short drying time, relatively low vapor pressure, and the MDI being consumed in the curing reaction. Furthermore, the oxidation system will reduce any MDI emissions by at least 95 percent, to negligible levels. The permanent total enclosure was assigned 100 percent capture efficiency. The oxidative catalysts were assigned 95 percent VOC destruction. Site specific performance testing from 2005 and 2010 shows VOC destruction exceeding █ percent. Milprint conservatively reports installation VOC emissions using 95 percent destruction, not the higher site specific values. Performance testing is scheduled for 2015 under the operating permit, however testing is required for the proposed RTO under this permit.

Solvent clean up potential emissions were calculated using mass balance, with all available VOC considered emitted and not controlled.

Pellet receiving and storage silo emissions were calculated using the applicant supplied emission factor of 0.032 pounds of particulate matter (PM), particulate matter less than 10 microns in diameter, and particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>). The emission factor is more conservative than other plastic pellet silo emission factors permitted by the Air Pollution Control Program, and according to the applicant has been verified in other states.

Potential emissions from the corona treaters were calculated using an ozone emission factor of 0.073 pounds per kilowatt hour. 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 but no de minimis level. However, it is typically considered a secondary pollutant that forms from VOC and nitrogen oxides (NO<sub>x</sub>). Ozone was the only pollutant considered from the corona treaters.

Natural gas combustion potential emissions were calculated using emission factors from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air*

*Pollutant Emission Factors*, Fifth Edition, Section 1.4, *Natural Gas Combustion*, July 1998, Source Classification Code (SCC) 1-02-006-03 for industrial boilers less than 10 MMBtu/hr heat input.

Emergency generator potential emissions were calculated using AP-42, Section 3.3, *Gasoline and Diesel Industrial Engines*, October 1996. Sulfur oxide emissions were calculated using mass balance. 40 CFR 89 Tier 2 emission standards replaced AP-42 emission factors where appropriate.

Receiving and shipping occupy the same paved haul road. Potential emissions were calculated using AP-42, Section 13.2.1, *Paved Roads*, January 2011. Exact production rates were not available on a mass basis, therefore maximum hourly design rates were based upon historic truck usage, corrected to a potential basis.

The following table provides an emissions summary for this project. Existing potential emissions are cited from permits 022004-008, 022004-008A, and OP2011-053. Existing actual emissions were taken from the installation's 2011 Emission Inventory Questionnaire (EIQ). Uncontrolled potential emissions represent the potential of the two phase projects equipment, assuming continuous operation (8,760 hours per year). The installation conditioned potential represents voluntary limits to less than NSR major source levels.

Table 7: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2011 EIQ)	Unconditioned Potential Emissions of Project 2012-02-010	Unconditioned Potential Emissions of Project 2012-04-052	New Installation Conditioned Potential
PM	25.0	N/D	N/D	N/A	4.12	N/D
PM <sub>10</sub>	15.0	7.9	0.22	N/A	2.09	N/D
PM <sub>2.5</sub>	10.0	N/D	0.22	N/A	1.70	N/D
SO <sub>x</sub>	40.0	0.4	0.02	N/A	0.04	N/D
NO <sub>x</sub>	40.0	70.3	2.95	N/A	6.11	N/D
VOC	40.0	< 250.0	177.59	379.14	909.88	< 250.0
CO	100.0	18.5	2.48	N/A	5.09	N/D
HAPs	10.0/25.0	<10.0/25.0	N/D	N/A	0.11	< 10.0/25.0
CO <sub>2</sub>	N/A	N/D	N/D	N/A	7,082.69	N/D
CH <sub>4</sub>	N/A	N/D	N/D	N/A	0.14	N/D
N <sub>2</sub> O	N/A	N/D	N/D	N/A	0.13	N/D
GHG (mass)	0/100/250	N/D	N/D	N/A	7,082.95	N/D
GHG (CO <sub>2</sub> e)	75,000/100,000	N/D	N/D	N/A	7,125.73	N/D
Ozone	<sup>1</sup>	N/D	N/D	17.91	15.67	N/D

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

<sup>1</sup> Ozone does not have a de minimis level, however it does have an 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 and HAP from the entire installation are conditioned below the NSR major source levels.

## 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

- *New Source Performance Regulations*, 10 CSR 10-6.070 – *New Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines*, 40 CFR Part 60, Subpart IIII
- *Maximum Achievable Control Technology (MACT) Regulations*, 10 CSR 10-6.075, *National Emission Standards for Stationary Reciprocating Internal Combustion Engines*, 40 CFR Part 63, Subpart ZZZZ
- *Maximum Achievable Control Technology (MACT) Regulations*, 10 CSR 10-6.075, *National Emission Standards for National Emission Standards for the Printing and Publishing Industry*, 40 CFR Part 63, Subpart KK
- *Restriction of Emission of Sulfur Compounds*, 10 CSR 10-6.260 applies to the emergency generator, however it will be in compliance due to combusting solely ultra-low sulfur diesel.

## 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.

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David Little  
Environmental Engineer

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Date

### PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated April 11, 2012, received April 16, 2012, designating Bemis Company, Inc. as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.

## Attachment A – Alternative Coating Potential to Emit Compliance Worksheet

Milprint Packaging LLC  
 Jasper County, S30, T28N, R32W  
 Project Number: 2012-04-052  
 Installation ID Number: 097-0132  
 Permit Number: \_\_\_\_\_

This sheet covers EU-21, EU-22, or EU-23 (Circle one) 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 (max 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 3<sup>rd</sup> Deck EU-15</i>	<i>Benzene 71-43-2</i>	<i>no</i>	<i>2.0%</i>	██████	██████	██████	<i>10.12</i>	<i>2.0</i>
<i>(Example) TCL 3<sup>rd</sup> 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 95 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. Record the 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
AMINOBIIPHENYL, [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	DBENZOFURAN	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	DICHLOROETHANE, [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		0.01	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	DICHLOROPHENOXYACETIC 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-DIISOCYANATE	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	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	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	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	POLYCYCLIC 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	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					PROPYLENEIMINE, [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	TRIETHYLAMINE	121-44-8	10		Y	N						
NITROPROPANE, [2-]	79-46-9	1		Y	N	TRIFLURALIN	1582-09-8	9		Y	Y						
Notes																	
												Note 1	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: 2012-04-052

Dear Ms. Janssen:

Enclosed with this letter is your 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: 2012-04-052

Permit Number: