

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: **11 2015 - 002** Project Number: 2015-07-002
Installation Number: 083-046

Parent Company: TC Transcontinental Packaging

Parent Company Address: 400 Sainte-Croix Ave. Suite 100 East, Saint-Laurent, Quebec

Installation Name: Transcontinental Capri 2

Installation Address: 1801 N Gerhart Dr, Clinton, MO 64735

Location Information: Henry County, S34, T42N, R26W

Application for Authority to Construct was made for:
New flexographic printing press and associated drying oven. 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.

Chad Stephenson

Prepared by
Chad Stephenson
New Source Review Unit

Kendall B. Halo for

Director or Designee
Department of Natural Resources

NOV 02 2015

Effective Date

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 start up 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 start up 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.

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."

Transcontinental Capri 2
Henry County, S34, T42N, R26W

1. Superseding Condition
 - A. The conditions of this permit supersede Special Condition 3.A. found in the previously issued construction permit #102010-008A issued by the Air Pollution Control Program.

2. Control Device Requirement – Regenerative Thermal Oxidizer (RTO)
 - A. Transcontinental Capri 2 shall control emissions from the new flexographic printing press #7 (EP-09) using an RTO as specified in the permit application.

 - B. The RTO shall be operated and maintained in accordance with the manufacturer's specifications.

 - C. The current temperature recorder on the RTO monitors the temperatures from the combustion chamber and the two media beds and records the highest temperature of the three. The highest of the three temperature shall be maintained at no less than 1,600 degrees Fahrenheit (oF). The monitor shall have an accuracy within ± 1 percent of the temperature being measured and shall be located such that the Department of Natural Resources personnel may easily observe them.

 - D. Transcontinental Capri 2 shall maintain an operating and maintenance log for the RTO which shall include the following;
 - 1) Incidents of malfunction, with impacts on emissions, duration of events, probable causes, and corrective actions; and
 - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

3. VOC and Formaldehyde Emission Limitations
 - A. Transcontinental Capri 2 shall emit less than 250.0 tons of VOCs in any consecutive 12-month period from the entire installation. The installation consists of the following equipment/activities.

SPECIAL CONDITIONS:

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

Table 1: Installation Equipment List

Emission Point	Equipment
CD2	Burner on Catalytic Oxidizer
CD3	Burner on Thermal Oxidizer
EP-03	Cyrel Fast Platemaking
EP-04	Cyrel Fast Platemaking
EP-06	Flexopress # 4
EP-07	Flexopress #5
EP-08	Flexopress #6
EP-08A	Press #6 Drying Oven
EP-09	Flexopress #7
EP-09A	Press #7 Drying Oven

- B. Transcontinental Capri 2 shall emit less than 2.0 tons of formaldehyde in any consecutive 12-month period from the equipment of this project, which includes Press #7 (EP-09), Press #7 drying oven (EP-09A), and the RTO (CD3).
- C. Transcontinental Capri 2 shall develop forms to demonstrate compliance with Special Condition 3.A and 3.B. In the forms, Transcontinental Capri 2 shall at a minimum use the following information:
- 1) Installation name
 - 2) Installation ID
 - 3) Permit number
 - 4) Current Month
 - 5) Current 12-Month Date Range
 - 6) Emission Units
 - 7) Installation Wide Current Monthly Throughput of VOC containing materials with respective VOC contents
 - 8) VOC containing materials with the VOC content obtained from the most recent Certified Product Data Sheet (CPDS) or SDS. On all SDS, if a range is given, the highest VOC content in the range shall be used
 - 9) Formaldehyde containing materials with the Formaldehyde content obtained from the most recent Certified Product Data Sheet (CPDS) or SDS. On all SDS, if a range is given, the highest Formaldehyde content in the range shall be used
 - 10) A capture efficiency of 85%
 - 11) Control device efficiency of 98% for emission units controlled by the RTO.
 - 12) The facility may use a higher control efficiency if it performs stack test(s) that show a higher value and the test results have been

SPECIAL CONDITIONS:

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

approved by the Compliance/Enforcement Unit of the Air Pollution Control Program. If the facility decides to conduct a new test, it shall use the stack testing procedure outlined in Special Condition 5.

- 13) VOC and formaldehyde emissions from ink and solvent usage calculated using a mass balance approach
- 14) On combustion equipment, use a VOC emission factor of 0.0054 lb/MMBtu and a formaldehyde emission factor of 0.000075 lb/MMBtu.
- 15) For record keeping, in order to take credit for the VOC content in the solvent reclaim and/or the hazardous waste ink, Transcontinental Capri 2 shall obtain the solid content of the reclaim and/or the VOC content of the hazardous waste ink by testing. The solid content of the reclaim and/or the VOC content of the hazardous waste shall be obtained once every quarter (3 months) and the highest solid content of the reclaim and the lowest VOC content of the hazardous waste ink previously obtained should be used. After 12 months, if the testing shows similar results and minimal effect on VOC emissions calculations, Transcontinental Capri 2 may apply to reduce the testing frequency requirements. Whether the testing shows similar results and minimal effect on VOC emissions calculations shall be determined by the Air Pollution Control Program's Compliance/Enforcement Section. In lieu of testing, the installation may also obtain the solid content of the reclaim and/or the VOC content from the recycler. Transcontinental Capri 2 may use reports from the recycler to create an average solid content percentage
 - a) The total VOC emissions from the solvents can be represented as follows:
 - b) $\text{Actual VOC emissions from solvents before control (lbs)} = \text{solvent used before control (lbs)} - [\text{solvent solid mixture sent offsite (lbs)} \times (100\% - \text{solid content of solvent sent offsite as received by the recycler (\%)})]$
- 16) VOC and Formaldehyde emissions from the current month
- 17) 12-month rolling total VOC emissions and Formaldehyde emissions
- 18) Indication of compliance with Special Condition 3.A and 3.B.

4. Use of Alternative Material

- A. When considering using an alternative material that is different than a material listed in the Application for Authority to Construct, Transcontinental Capri 2 shall calculate the potential emissions of each individual HAP using a maximum hourly design rate of 0.36 tons of ink per hour.

SPECIAL CONDITIONS:

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

- B. In the forms required in Special Condition 4.A., Transcontinental Capri 2 shall use a capture efficiency of 85% and control device efficiency of 98% for emission units controlled by the RTO. The facility may use a higher control efficiency if it performs stack test(s) that shows a higher value and the test results have been approved by the Compliance/Enforcement Unit of the Air Pollution Control Program. If the facility decides to conduct a new test, it shall use the stack testing procedure outlined in Special Condition 5. Transcontinental Capri 2 shall also ensure that the total 12-month emissions for each HAP are listed.
 - C. If the potential emissions of any individual HAP calculated in Special Condition 4.B. are equal to or greater than the Screening Model Action Level (SMAL) listed in the Air Pollution Control Program's Table of Hazardous Air Pollutants, Screen Model Action Levels and Risk Assessment Levels, Transcontinental Capri 2 shall seek approval from the Air Pollution Control Program before use of the alternative material. For the most current listing of HAP SMALs, please check the Department of Natural Resources online website.
5. Stack Testing Procedure
- A. 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 must be approved by the Director prior to conducting the required emissions testing.
 - B. Any performance test shall be conducted during period of representative conditions and shall be conducted at the maximum process rate or within ten percent (10%) of this rated capacity, not to include periods of start-up, shutdown, or malfunction.
 - C. Two copies of a written report of the performance test results shall be submitted to and be approved by the Director before the facility can use the new RTO control efficiency. The report must include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required U.S. EPA Method for at least one sample run.
 - D. The test report is to fully account for all operational and emission parameters addressed both in the permit conditions as well as in other applicable state or federal rules or regulations. The test report shall establish operational upper and lower range limits for RTO operating temperature ($^{\circ}\text{F}$) and exhaust flowrate (dscfm). Transcontinental Capri 2 shall operate the RTO under these temperature and flowrate ranges.

SPECIAL CONDITIONS:

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

6. Operational Requirement - Solvent/Ink Identification
 - A. Transcontinental Capri 2 shall keep the solvents and inks in sealed containers whenever the materials are not in use. Transcontinental Capri 2 shall provide and maintain suitable, easily read, permanent markings on all inks, solvent and cleaning solution containers used with this equipment.

7. Record Keeping and Reporting Requirements
 - A. Transcontinental Capri 2 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 SDS for all materials used.

 - B. Transcontinental Capri 2 shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after the end of the month during which any record required by this permit show an exceedance of a limitation imposed by this permit.

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

Project Number: 2015-07-002

Installation ID Number: 083-046

Permit Number:

Installation Address:

Transcontinental Capri 2
1801 N Gerhart Dr
Clinton, MO 64735

Parent Company:

TC Transcontinental Packaging
400 Sainte-Croix Ave. Suite 100 East
Saint-Laurent, Quebec

Henry County, S34, T42N, R26W

REVIEW SUMMARY

- Transcontinental Capri 2 has applied for authority to construct a new flexographic printing press and associated drying oven.
- The application was deemed complete on July 23, 2015.
- HAP emissions are expected from the proposed equipment. The HAP emitted from this process is formaldehyde.
- None of the New Source Performance Standards (NSPS) apply to the installation. Specifically NSPS Subpart QQ does not apply because the printing press is not a rotogravure printing unit.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) apply to this installation. None of the currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment. Specifically MACT Subpart KK does not apply because the installation is not a major source of HAPs.
- A regenerative thermal oxidizer is being used to control the VOC and VOC based HAP 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 are above de minimis levels but conditioned below the major emission source threshold. Potential emissions of formaldehyde are conditioned below the Screening Model Action Level (SMAL).
- This installation is located in Henry County, a nonattainment area for the 8-hour ozone standard and the PM_{2.5} standard and an attainment area for all other 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.
- An Intermediate Operating Permit or Title V Operating Permit is required for this installation. If Transcontinental Capri 2 chooses to take voluntary 100 ton per year limits on all pollutants whose PTE exceeds 100 ton per year, then an application is due within 90 days of commencement of operations. For Title V operating permits, an application is due within 1 year of commencement of operations.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Transcontinental Capri 2 is an existing minor source of VOC located in Clinton, Missouri. The installation was formerly known as Schreiber Foods, Inc. –Capri II. The installation operates a laminator, two flexographic printing presses (EU-6 Flexopress #4 and EU-7 Flexopress #5) that are controlled by a catalytic oxidizer (CD-2) and one flexographic printing press (EP-08 Flexopress #6) that is controlled by a thermal oxidizer (CD-3).

TC Transcontinental Packaging operates one other plant in Clinton, Missouri. The other plant (Capri I) is a flexographic printing operation. This plant was historically considered the same installation as Transcontinental Capri 2. However, as part of the review of Construction Permit #102010-008, TC Transcontinental Packaging requested the Program re-evaluate the same installation determination and they were determined to be separate installations.

The following construction permits have been issued to Transcontinental Capri 2 from the Air Pollution Control Program.

Table 2: Permit History

Permit Number	Description
072003-019	Installation of two new flexographic printing presses with a catalytic oxidizer.
102010-008	Installation of a new flexographic printing press (Flexopress #6) with a thermal oxidizer
102010-008A	Corrected calculations to show emissions from Flexopress #6

PROJECT DESCRIPTION

Transcontinental Capri 2 has applied for authority to construct a new flexographic printing press, Flexopress #7 (EP-09) and an associated drying oven (EP-09a). Flexopress #7 will be a 59 inch MIRAFLEX AM 8 flexographic printing press. VOC emissions are emitted during the printing process from the inks and solvents. The VOC emissions from the inks, including those emitted in the drying process, are vented through an existing regenerative thermal oxidizer known as control device #3 (CD3). The existing Flexopress #6 also vents to this thermal oxidizer (CD3). The press (EP-09) is capable of processing 0.36 tons of ink per hour. The press is enclosed with a cabinet and will not operate unless the cabinet is closed. This cabinet ensures that the thermal oxidizer captures approximately 85 percent of the VOC emitted during printing. Flexopress #7 will include a 0.625 MMBtu/hr natural gas fired drying oven, which dries the ink after it has been printed to the packaging.

EMISSIONS/CONTROLS EVALUATION

The following table provides an emissions summary for this project. Existing potential emissions were taken from permit #102010-008A. Existing actual emissions were taken from the installation's 2014 EIQ. Potential emissions of the application represent the potential emissions of the new equipment, assuming continuous operation (8760 hours per year).

Table 3: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	¹ Existing Potential Emissions	Existing Actual Emissions (2014 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM	25.0	0.11	N/D	0.02	N/A
PM ₁₀	15.0	0.22	0.0643	0.02	N/A
PM _{2.5}	10.0	0.11	0.0643	0.02	N/A
SO _x	40.0	0.02	0.0050	0.002	N/A
NO _x	40.0	2.91	0.8459	0.27	N/A
VOC	40.0	<250.0	69.89	502.26	² <250.0
CO	100.0	2.47	0.7105	0.23	N/A
HAPs	10.0/25.0	3.25	0.00	5.69	N/A
Formaldehyde	⁴ 2.0	<2.0	N/D	5.68	³ <2.0

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

Note 1: Existing Potential Emissions taken from Permits 102010-008A

Note 2: The limit of 250.0 tons per year VOC is an installation-wide limit.

Note 3: The limit of 2.0 tons per year Formaldehyde is only for the equipment of this project, which includes Flexographic Press #7 (EP-09), the RTO (CD-3), and the drying oven for Press #7 (EP-09a).

Note 4: Screening Model Action Level (SMAL)

Emissions from the combustion of natural gas (including particulates, sulfur oxides (SO_x), nitrogen oxides (NO_x), VOC, carbon monoxides (CO) and hazardous air

pollutants (HAP)) from the Press #7 dryer was calculated using emission factors from the EPA document AP-42, *Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources*, Fifth Edition, Chapter 1.4, *Natural Gas Combustion*, July, 1998. Press #7 dryer has a maximum hourly design rate of 0.625 MMBtu/hr.

Potential VOC emissions from the ink and solvent usage were calculated by multiplying the maximum ink and solvent usage by emission factors developed by the facility using mass balances. Press #7 has a combined maximum total ink and solvent usage of 0.36 tons per hour (tph). This number was estimated by multiplying the maximum ink and solvent application rate (in pounds per square foot (lb/ft²)) by the maximum speed of the press (in square foot per minute (ft²/min)) and converting it to tons per hour. The ink and solvent VOC emissions were calculated by multiplying the maximum ink and solvent usage by emissions factors developed by the facility. The emission factors assumed that all VOC used was emitted. Some VOC will be reclaimed but since the facility will be required to limit its installation-wide VOC emissions to 250 tons per year, a more thorough calculation of potential emissions is not needed.

Press #7 is enclosed by a cabinet and will not operate unless the cabinet is closed. An 85 percent (%) capture efficiency was given for the use of this cabinet. This number is from the EPA document, *Control Techniques Guidelines for Flexible Package Printing*, EPA453/R-06-003. In Special Condition 1.B. of Permit 102010-008, the facility was required to conduct performance tests to ensure that the VOC destruction efficiency of the RTO is greater than 98%. This test was conducted in 2011, and the calculated VOC destruction efficiency was 98.88% on a mass basis and 99.09% on a concentration basis. However, numerous measurement errors were made during the course of the stack test and the Air Pollution Control Program Enforcement Unit concluded that while the data suggests a VOC destruction efficiency greater than 98%, it is not known how accurate the calculated efficiencies are. Therefore, a control efficiency of 98% was used for the RTO. The 98% control efficiency should also be used when tracking actual VOC emissions for compliance with the VOC and formaldehyde limits. If the facility wants to use a higher control efficiency in calculating the actual emissions, it can choose to perform another stack test to obtain more accurate data.

When the equipment at Transcontinental Capri 2 was first permitted, it was determined to be part of the same installation as equipment at another location in Clinton, MO, designated as Transcontinental Capri 1. However, during an operating permit review (project 2011-03-027), it was decided that Transcontinental Capri 1 and Transcontinental Capri 2 should be considered separate installations. The equipment at Capri II was permitted under permits 0996-018, 072003-019 and 102010-008. Permit 0996-018 limited the entire installation, which includes both Transcontinental Capri 1 and Transcontinental Capri 2, to 99 tons per year of VOCs. The limit was superseded by 102010-008A. Permit 072003-019 does not contain any installation-wide limits and none of its conditions were superseded in permit 102010-008A.

Due to the complexity of plant operations, this permit does not include attachments to be used in tracking VOC and formaldehyde emissions for compliance. Instead, Special Conditions 3 and 4 allow the facility to develop its own tracking sheet(s). Normally, the facility would be required to submit the forms to the Compliance/Enforcement Unit of the

Air Pollution Control Program for approval. However, the electronic forms currently used by the installation were submitted to the New Source Review Unit during the review for Construction Permit #102010-008A. It was determined that the following changes must be made. First, the control efficiency used for the RTO in the submitted form is 99.09%, but as described earlier, the actual control efficiency that should be used is 98%. Secondly, the facility shall ensure that both the total VOC and formaldehyde emissions are listed along with their respective limits so that it can be clearly seen whether the facility is in compliance. With these changes, the facility is not be required to submit the forms to the Compliance/Enforcement Unit for approval since the forms are adequate for recordkeeping

In order to calculate actual emissions, the facility uses a mass balance approach for the printing presses. There are two sources of VOC emissions from the presses – ink usage and solvent usage. Solvents used at this facility are 100% VOC. Solvents that are too dirty to be reused are sent offsite, where they are distilled and sent back for reuse. The solvents that are reclaimed are subtracted out of the VOC emissions since they are not emitted. The total VOC emissions from the press can be represented as follows:

Actual VOC emissions from solvents before control (lbs) = solvent used before control (lbs) – [solvent solid mixture sent offsite (lbs) x (100% - solid content of solvent sent offsite as received by the recycler (%))]

The facility has analyzed the solid content of the reclaimed solvent and the solid contents range between 6.42% and 7.43%. The facility will now be required to perform tests on the reclaim solvent once every quarter (3 months) to verify the solid content. After each test, the highest solid content previously obtained shall be used for tracking purposes. After 12 months, if the testing shows similar results and minimal effect on the variability of VOC calculations, the facility may submit a letter to reduce the testing requirements. Whether or not testing shows similar results and minimal effect on the variability of VOC calculations shall be determined by the Air Pollution Control Program Compliance/Enforcement Section. In lieu of testing, the facility may also obtain the solid content from the recycler.

The facility also ships out VOC-saturated hazardous wastes to be recycled offsite. If the facility wants to take credit for the VOC contained in the hazardous wastes (i.e. subtract the VOC in the hazardous waste from the VOC emissions), it shall perform tests to determine the VOC content. Communications with the company suggests that the facility cannot perform the tests and would be willing to not take credit for the VOC in the hazardous waste stream. However, Special Condition 3.C. in this permit is written so that the company has the option of testing for the VOC content in the hazardous waste stream if it decides to do so in the future.

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 are above de minimis levels but conditioned below the major emission source threshold. Potential emissions of formaldehyde are conditioned below the Screening Model Action Level (SMAL) for this project.

APPLICABLE REQUIREMENTS

Transcontinental Capri 2 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

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*, it is recommended that this permit be granted with special conditions.

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated June 29, 2015, received July 6, 2015, designating TC Transcontinental Packaging as the owner and operator of the installation.

APPENDIX A

Abbreviations and Acronyms

%	percent	m/s	meters per second
°F	degrees Fahrenheit	Mgal	1,000 gallons
acfm	actual cubic feet per minute	MW	megawatt
BACT	Best Available Control Technology	MHDR	maximum hourly design rate
BMPs	Best Management Practices	MMBtu	Million British thermal units
Btu	British thermal unit	MMCF	million cubic feet
CAM	Compliance Assurance Monitoring	MSDS	Material Safety Data Sheet
CAS	Chemical Abstracts Service	NAAQS ...	National Ambient Air Quality Standards
CEMS	Continuous Emission Monitor System	NESHAPs	National Emissions Standards for Hazardous Air Pollutants
CFR	Code of Federal Regulations	NO_x	nitrogen oxides
CO	carbon monoxide	NSPS	New Source Performance Standards
CO₂	carbon dioxide	NSR	New Source Review
CO_{2e}	carbon dioxide equivalent	PM	particulate matter
COMS	Continuous Opacity Monitoring System	PM_{2.5}	particulate matter less than 2.5 microns in aerodynamic diameter
CSR	Code of State Regulations	PM₁₀	particulate matter less than 10 microns in aerodynamic diameter
dscf	dry standard cubic feet	ppm	parts per million
EQ	Emission Inventory Questionnaire	PSD	Prevention of Significant Deterioration
EP	Emission Point	PTE	potential to emit
EPA	Environmental Protection Agency	RACT	Reasonable Available Control Technology
EU	Emission Unit	RAL	Risk Assessment Level
fps	feet per second	SCC	Source Classification Code
ft	feet	scfm	standard cubic feet per minute
GACT	Generally Available Control Technology	SDS	Safety Data Sheet
GHG	Greenhouse Gas	SIC	Standard Industrial Classification
gpm	gallons per minute	SIP	State Implementation Plan
gr	grains	SMAL	Screening Model Action Levels
GWP	Global Warming Potential	SO_x	sulfur oxides
HAP	Hazardous Air Pollutant	SO₂	sulfur dioxide
hr	hour	tph	tons per hour
hp	horsepower	tpy	tons per year
lb	pound	VMT	vehicle miles traveled
lbs/hr	pounds per hour	VOC	Volatile Organic Compound
MACT	Maximum Achievable Control Technology		
µg/m³	micrograms per cubic meter		

Mr. Johnny Crawford
Regulatory Tech
Transcontinental Capri 2
1801 N Gerhart Dr.
Clinton, MO 64735

RE: New Source Review Permit - Project Number: 2015-07-002

Dear Mr. Crawford:

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. 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 were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the administrative hearing commission, whose contact information is: Administrative Hearing Commission, Truman State Office Building, Jefferson City, Missouri 65102, website: www.ao.mo.gov/ahc. If you have questions regarding this permit, contact Chad Stephenson, Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 (573) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Susan Heckenkamp
New Source Review Unit Chief

SH:csl

Enclosures

c: Kansas City Regional Office
PAMS File: 2015-07-002
Permit Number: