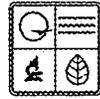


STATE OF MISSOURI



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: **06 2015 - 003**

Project Number: 2014-09-041

Installation Number: 157-0027

Parent Company: TNT Plastics, Inc.

Parent Company Address: 701 Industrial Drive, Perryville, Missouri 63775

Installation Name: TNT Plastics, Inc.

Installation Address: 701 Industrial Drive, Perryville, Missouri 63775

Location Information: Perry County, S18, T35N, R11E

Application for Authority to Construct was made for:

The modification of an existing printing press to increase the maximum hourly design rate from 0.004 tons per hour to 0.014 tons per hour. 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.

JUN 09 2015

EFFECTIVE DATE

A handwritten signature in cursive script, appearing to read "Kymal Rose".

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 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.

Page No.	3
Permit No.	
Project No.	2014-09-041

**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."*

TNT Plastics, Inc.  
Perry County, S18, T35N, R11E

1. Installation-Wide VOC Emission Limitations
  - A. TNT Plastics, Inc. shall emit less than 250.0 tons of VOCs in any consecutive 12-month period from the entire installation.
  - B. To demonstrate compliance with Special Condition 1.A., TNT Plastics, Inc. shall track VOC emissions from *all* equipment located at this site using Attachment A or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program.
2. Operational Requirement - Solvent/Ink Cloths
  - A. TNT Plastics, Inc. shall keep the ink solvents and cleaning solutions in sealed containers whenever the materials are not in use. TNT Plastics, Inc. shall provide and maintain suitable, easily read, permanent markings on all inks, solvent and cleaning solution containers used with this equipment.
3. Record Keeping and Reporting Requirements
  - A. TNT Plastics, Inc. 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. TNT Plastics, Inc. 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: 2014-09-041  
Installation ID Number: 157-0027  
Permit Number:

TNT Plastics, Inc.  
701 Industrial Drive  
Perryville, Missouri 63775

Complete Date  
of Application: January 15, 2015

Parent Company:  
TNT Plastics, Inc.  
701 Industrial Drive  
Perryville, Missouri 63775

Perry County, S18, T35N, R11E

REVIEW SUMMARY

- TNT Plastics, Inc. has applied for authority to complete the modification of an existing printing press to increase the maximum hourly design rate from 0.004 tons per hour to 0.014 tons per hour.
- HAP emissions are not expected from the proposed equipment.
- None of the New Source Performance Standards (NSPS) apply to the installation.
- None of the NESHAPs apply to this installation. None of the currently promulgated MACT regulations apply to the proposed equipment.
- No air pollution control equipment is being used in association with the new equipment.
- 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 under the major source threshold.
- This installation is located in Perry 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.
- Emissions testing are not required for the equipment.

- The existing Part 70 Operating Permit shall be amended according to the changes made to the facility in this permit; additional information should be submitted as necessary by TNT Plastics, Inc. to the Missouri Air Pollution Control Program – Operating Permits Unit.
- Approval of this permit is recommended with special conditions.

### INSTALLATION DESCRIPTION

TNT Plastics, Inc. is located in Perryville, Missouri (Site ID: 157-0027). There are currently 6 flexographic printing presses at this installation. There is a Part 70 Operating Permit (Permit #: OP2009-044) associated with this installation. TNT Plastics, Inc. is under the installation-wide construction permit VOC major source emission threshold of 250.0 tons per year.

The following New Source Review permits have been issued to TNT Plastics, Inc. from the Air Pollution Control Program.

Table 1: Permit History

Permit Number	Description
0598-001	NOV -- 4-flexographic printing presses
0799-021	Printing presses installed
012003-006	Printing presses installed

### PROJECT DESCRIPTION

TNT Plastics, Inc. is applying for this permit to adjust the MHDR of EP-2, Wolverine Press from 0.004 tons per hour (sum of the ink and solvent usage) to 0.014 tons per hour because the printing press has been modified to allow for additional colors of ink and an increased throughput. The original MHDR (0.004 tph) resulted in a calculated potential to emit (PTE) of 29.53 tons per year (taken from the 1998 Emissions Inventory Questionnaire), but, with the corrected MHDR value (0.014 tph), the PTE is 105.9 tons per year. The discrepancies in emissions calculations are due to the modification of the printing press and the modified ratio of ink to solvent used. It was assumed that 100% of VOC emissions occur during the printing process, instead of allotting portions of VOC emissions for each step in the printing process (printing, heating, etc.). Each value for the VOC portion of density (pound per gallon) shall be taken from the material SDS for the respective ink or solvent, and any portion of density given as a range shall be recorded as if the highest percentage value of the range is the actual VOC content of the compound. If a document that states the exact VOC portion of density is provided by and signed by the manufacturer of a particular compound, the exact value may be used; however, all documents that are necessary for calculation and justification of emissions shall also be kept with the required records (for the allotted time specified in this permit).

TNT Plastics, Inc. is taking a voluntary site-wide construction permit limit of 250.0 tons per year of VOCs to remain a minor source—rather than taking a de minimis increase

based on the baseline actual emissions for this individual emission unit. Special Conditions have been included in this permit to track VOC emissions from this particular printing press, as well as VOC emissions from all equipment on-site.

### EMISSIONS/CONTROLS EVALUATION

The potential to emit (PTE) was calculated using mass balances of the total (combined) ink and solvent usage for this printing press (EP-2). 100% VOC emissions were assumed throughout the calculations in order to remain as conservative as possible.

The following table provides an emissions summary for this project. Existing potential emissions were taken from the most recent construction permit, 012003-006. Existing actual emissions were taken from the installation's 2013 EIQ. Potential emissions of the application represent the potential of the modified equipment, assuming continuous operation (8760 hours per year). New installation conditioned potential emissions represent the installation-wide potential to emit for applicable pollutants. Conditioned potential emissions of the application represent the PTE conditioned by the voluntary VOC limit of 40.0 tons per year.

Table 2: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2013 EIQ)	Potential Emissions of the Application	Conditioned Potential Emissions of the Application	New Installation Conditioned Potential
PM	25.0	N/A	N/A	N/A	N/A	N/A
PM <sub>10</sub>	15.0	5.97	N/A	N/A	N/A	5.97
PM <sub>2.5</sub>	10.0	N/A	N/A	N/A	N/A	N/A
SO <sub>x</sub>	40.0	0.02	N/A	N/A	N/A	0.02
NO <sub>x</sub>	40.0	1.85	N/A	N/A	N/A	1.85
VOC	40.0	242.0	105.7	105.9 <sup>a</sup>	105.9	< 250.0 <sup>b</sup>
CO	100.0	2.24	N/A	N/A	N/A	2.24
GHG (mass)	0.0 / 100.0 / 250.0	N/A	N/A	N/A	N/A	N/A
HAPs	10.0/25.0	7.28	N/A	N/A	N/A	7.28

N/A = Not Applicable

<sup>a</sup> Based on the modified MHDR (0.014 tons per hour) established with project #2014-09-041

<sup>b</sup> Accounts for the voluntary installation-wide major source construction permit emission limit of 250.0 tpy taken for VOC emissions.

### 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 under the major source threshold.

## APPLICABLE REQUIREMENTS

TNT Plastics, Inc. 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*, I recommend this permit be granted with special conditions.

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Jordan Hindman  
New Source Review Unit

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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 September 16, 2014, received September 22, 2014, designating TNT Plastics, Inc. as the owner and operator of the installation.

Attachment A – Installation-Wide VOC Compliance Worksheet

TNT Plastics, Inc.  
 Perry County, S18, T35N, R11E  
 Project Number: 2014-09-041  
 Installation ID Number: 157-0027  
 Permit Number:

This sheet covers the period from \_\_\_\_\_ to \_\_\_\_\_.  
 (month, year) (month, year)

	Individual Totals:	(Units)	Month:
<b>EP-2 Extrusion Dept. 4 Color Wolverine Press</b>			
<sup>1</sup> VOC Portion of Density (Ink):		Lbs of VOC/Gallon	
<sup>1</sup> VOC Portion of Density (Solvent):		"	
Hours (run time)/month:			
Ink used this month (gal):			
<sup>2</sup> Total VOCs from Inks:			
Alcohol used this month (gal):			
<sup>2</sup> Total VOCs from Alcohol:		Lbs of VOC	
Total VOCs this month		"	
<b>EP-3 Extrusion Dept. 2 color Miesel Press</b>			
<sup>1</sup> VOC Portion of Density (Ink):		Lbs of VOC/Gallon	
<sup>1</sup> VOC Portion of Density (Solvent):		"	
Hours (run time)/month:			
Ink used this month (gal):			
<sup>2</sup> Total VOCs from Inks:			
Alcohol used this month (gal):			
<sup>2</sup> Total VOCs from Alcohol:		Lbs of VOC	
Total VOCs this month		"	
<b>EP-5 Printing Dept. 6 color Condes Press</b>			
<sup>1</sup> VOC Portion of Density (Ink):		Lbs of VOC/Gallon	
<sup>1</sup> VOC Portion of Density (Solvent):		"	
Hours (run time)/month:			
Ink used this month (gal):			
<sup>2</sup> Total VOCs from Inks:			
Alcohol used this month (gal):			
<sup>2</sup> Total VOCs from Alcohol:		Lbs of VOC	
Total VOCs this month		"	

<b>EP-8 Printing Dept. 8 color Bielloni</b>			
<sup>1</sup> VOC Portion of Density (Ink):		Lbs of VOC/Gallon	
<sup>1</sup> VOC Portion of Density (Solvent):		"	
Hours (run time)/month:			
Ink used this month (gal):			
<sup>2</sup> Total VOCs from Inks:			
Alcohol used this month (gal):			
<sup>2</sup> Total VOCs from Alcohol:		Lbs of VOC	
Total VOCs this month		"	
<b>EP-10 Extrusion Dept. 4 color Uteco Press</b>			
<sup>1</sup> VOC Portion of Density (Ink):		Lbs of VOC/Gallon	
<sup>1</sup> VOC Portion of Density (Solvent):		"	
Hours (run time)/month:			
Ink used this month (gal):			
<sup>2</sup> Total VOCs from Inks:			
Alcohol used this month (gal):			
<sup>2</sup> Total VOCs from Alcohol:		Lbs of VOC	
Total VOCs this month		"	
<b>EP-11 Extrusion Dept. 2 color Bronco Press</b>			
<sup>1</sup> VOC Portion of Density (Ink):		Lbs of VOC/Gallon	
<sup>1</sup> VOC Portion of Density (Solvent):		"	
Hours (run time)/month:			
Ink used this month (gal):			
<sup>2</sup> Total VOCs from Inks:			
Alcohol used this month (gal):			
<sup>2</sup> Total VOCs from Alcohol:		Lbs of VOC	
Total VOCs this month		"	
<b>Total Inks used this month:</b>			
<b>Total alcohol used this month:</b>			
<sup>3</sup> <b>Total VOCs this month (tons):</b>			
<sup>4</sup> <b>12-Month VOC Emissions (tons):</b>			

<sup>1</sup> Input the VOC portion of total density value (lb/gal) from the material SDS for each ink and solvent used on each printing press. For SDSs with a range for a given VOC, the highest value of that range must be used unless a written document signed by the manufacturer provides the exact value of the VOC portion of total density. This signed document must be kept in the records for justification upon request by Missouri Department of Natural Resources.

<sup>2</sup> Multiply the VOC portion of density (lb/gal) by the total number of gallons of the respective ink or solvent that was used. This product will be the resulting amount of VOCs from a particular printing press and a particular ink or solvent used. This process shall be repeated for each combination of printing press and ink/solvent used each month.

<sup>3</sup> Add together the VOC emission totals for each combination of printing press and ink/solvent used, and then divide the total VOC emissions (lbs) by 2000 lb/ton to get the resulting installation-wide VOC emissions from ink/solvent usage (tons) for the given month.

<sup>4</sup> Sum all of the VOC emissions values (tons) from each monthly emissions total, found in the "Total VOCs this month" row on each month's tracking sheet. This value shall not exceed **250.0 tons** in any consecutive 12-month period.

## APPENDIX A

### Abbreviations and Acronyms

<b>%</b> .....percent	<b>m/s</b> ..... meters per second
<b>°F</b> .....degrees Fahrenheit	<b>Mgal</b> ..... 1,000 gallons
<b>acfm</b> .....actual cubic feet per minute	<b>MW</b> ..... megawatt
<b>BACT</b> .....Best Available Control Technology	<b>MHDR</b> ..... maximum hourly design rate
<b>BMPs</b> .....Best Management Practices	<b>MMBtu</b> .... Million British thermal units
<b>Btu</b> .....British thermal unit	<b>MMCF</b> ..... million cubic feet
<b>CAM</b> .....Compliance Assurance Monitoring	<b>MSDS</b> ..... Material Safety Data Sheet
<b>CAS</b> .....Chemical Abstracts Service	<b>NAAQS</b> ... National Ambient Air Quality Standards
<b>CEMS</b> .....Continuous Emission Monitor System	<b>NESHAPs</b> National Emissions Standards for Hazardous Air Pollutants
<b>CFR</b> .....Code of Federal Regulations	<b>NO<sub>x</sub></b> ..... nitrogen oxides
<b>CO</b> .....carbon monoxide	<b>NSPS</b> ..... New Source Performance Standards
<b>CO<sub>2</sub></b> ..... carbon dioxide	<b>NSR</b> ..... New Source Review
<b>CO<sub>2e</sub></b> ..... carbon dioxide equivalent	<b>PM</b> ..... particulate matter
<b>COMS</b> .....Continuous Opacity Monitoring System	<b>PM<sub>2.5</sub></b> ..... particulate matter less than 2.5 microns in aerodynamic diameter
<b>CSR</b> .....Code of State Regulations	<b>PM<sub>10</sub></b> ..... particulate matter less than 10 microns in aerodynamic diameter
<b>dscf</b> .....dry standard cubic feet	<b>ppm</b> ..... parts per million
<b>EIQ</b> .....Emission Inventory Questionnaire	<b>PSD</b> ..... Prevention of Significant Deterioration
<b>EP</b> .....Emission Point	<b>PTE</b> ..... potential to emit
<b>EPA</b> .....Environmental Protection Agency	<b>RACT</b> ..... Reasonable Available Control Technology
<b>EU</b> .....Emission Unit	<b>RAL</b> ..... Risk Assessment Level
<b>fps</b> .....feet per second	<b>SCC</b> ..... Source Classification Code
<b>ft</b> .....feet	<b>scfm</b> ..... standard cubic feet per minute
<b>GACT</b> .....Generally Available Control Technology	<b>SDS</b> ..... Safety Data Sheet
<b>GHG</b> .....Greenhouse Gas	<b>SIC</b> ..... Standard Industrial Classification
<b>gpm</b> .....gallons per minute	<b>SIP</b> ..... State Implementation Plan
<b>gr</b> .....grains	<b>SMAL</b> ..... Screening Model Action Levels
<b>GWP</b> .....Global Warming Potential	<b>SO<sub>x</sub></b> ..... sulfur oxides
<b>HAP</b> .....Hazardous Air Pollutant	<b>SO<sub>2</sub></b> ..... sulfur dioxide
<b>hr</b> .....hour	<b>tph</b> ..... tons per hour
<b>hp</b> .....horsepower	<b>tpy</b> ..... tons per year
<b>lb</b> .....pound	<b>VMT</b> ..... vehicle miles traveled
<b>lbs/hr</b> .....pounds per hour	<b>VOC</b> ..... Volatile Organic Compound
<b>MACT</b> ..... Maximum Achievable Control Technology	
<b>µg/m<sup>3</sup></b> ..... micrograms per cubic meter	

Mr. Bryon McClure  
Plant Manager  
TNT Plastics, Inc.  
701 Industrial Drive  
Perryville, Missouri 63775

RE: New Source Review Permit - Project Number: 2014-09-041

Dear Mr. McClure:

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, if any, 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, P.O. Box 1557, Jefferson City, Mo 65102, [www.ao.mo.gov/ahc](http://www.ao.mo.gov/ahc).

If you have any questions regarding this permit, contact Jordan Hindman, Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 at (573) 751-4817.

Sincerely,

**AIR POLLUTION CONTROL PROGRAM**

Susan Heckenkamp  
New Source Review Unit Chief

SH;jhl

Enclosures

c: Southeast Regional Office  
PAMS File: 2014-09-041  
Permit Number: