

**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION**

October 12, 2017

**PERMIT TO INSTALL**  
401-96F

**ISSUED TO**  
Packaging Personified, Inc.

**LOCATED AT**  
122 South Aspen Street  
Sparta, Michigan

**IN THE COUNTY OF**  
Kent

**STATE REGISTRATION NUMBER**  
N3205

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environmental Quality. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203:

**June 20, 2017**

DATE PERMIT TO INSTALL APPROVED:

**October 12, 2017**

SIGNATURE:

DATE PERMIT VOIDED:

SIGNATURE:

DATE PERMIT REVOKED:

SIGNATURE:

**PERMIT TO INSTALL**

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**Common Abbreviations / Acronyms**

<b>Common Acronyms</b>		<b>Pollutant / Measurement Abbreviations</b>	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO <sub>2e</sub>	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/ department	Michigan Department of Environmental Quality	°F	Degrees Fahrenheit
EU	Emission Unit	gr	Grains
FG	Flexible Group	HAP	Hazardous Air Pollutant
GACS	Gallons of Applied Coating Solids	Hg	Mercury
GC	General Condition	hr	Hour
GHGs	Greenhouse Gases	HP	Horsepower
HVLP	High Volume Low Pressure*	H <sub>2</sub> S	Hydrogen Sulfide
ID	Identification	kW	Kilowatt
IRSL	Initial Risk Screening Level	lb	Pound
ITSL	Initial Threshold Screening Level	m	Meter
LAER	Lowest Achievable Emission Rate	mg	Milligram
MACT	Maximum Achievable Control Technology	mm	Millimeter
MAERS	Michigan Air Emissions Reporting System	MM	Million
MAP	Malfunction Abatement Plan	MW	Megawatts
MDEQ	Michigan Department of Environmental Quality	NMOC	Non-methane Organic Compounds
MSDS	Material Safety Data Sheet	NO <sub>x</sub>	Oxides of Nitrogen
NA	Not Applicable	ng	Nanogram
NAAQS	National Ambient Air Quality Standards	PM	Particulate Matter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM <sub>10</sub>	Particulate Matter equal to or less than 10 microns in diameter
NSPS	New Source Performance Standards	PM <sub>2.5</sub>	Particulate Matter equal to or less than 2.5 microns in diameter
NSR	New Source Review	pph	Pounds per hour
PS	Performance Specification	ppm	Parts per million
PSD	Prevention of Significant Deterioration	ppmv	Parts per million by volume
PTE	Permanent Total Enclosure	ppmw	Parts per million by weight
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO <sub>2</sub>	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

\*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

### GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to R 336.1210, operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to R 336.1219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of R 336.1219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of R 336.1301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with R 336.1303. **(R 336.1301)**
  - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
  - b) A visible emission limit specified by an applicable federal new source performance standard.
  - c) A visible emission limit specified as a condition of this Permit to Install.
  
12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in R 336.1370(2). **(R 336.1370)**
  
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001. **(R 336.2001)**

**SPECIAL CONDITIONS**

**EMISSION UNIT SUMMARY TABLE**

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

<b>Emission Unit ID</b>	<b>Emission Unit Description (Process Equipment &amp; Control Devices)</b>	<b>Installation Date / Modification Date</b>	<b>Flexible Group ID</b>
EUFLEXOTECH8CL	A Flexotechnica 57" wide 8-color flexographic printing press and associated natural gas fired drying oven. Emissions from the press and oven are captured via a Non Fugitive Enclosure (NFE) and controlled by an associated regenerative thermal oxidizer (RTO).	2007	FGFLEXOPRINT
EUFLEXO2014	A Flexotechnica 57" wide 8-color flexographic printing press and associated natural gas fired drying oven. Emissions from the press and oven are captured via a NFE and controlled by an associated RTO.	2014	FGFLEXOPRINT
Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1290.			

**FLEXIBLE GROUP SUMMARY TABLE**

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

<b>Flexible Group ID</b>	<b>Flexible Group Description</b>	<b>Associated Emission Unit IDs</b>
FGFLEXOPRINT	Two flexotechnica 57" wide 8-color flexographic printing presses and associated natural gas fired drying ovens. Emissions are captured via a NFE and controlled by an associated RTO.	EUFLEXO2014, EUFLEXOTECH8CL

**The following conditions apply to: FGFLEXOPRINT**

**DESCRIPTION:** Two flexotechnica 57" wide 8-color flexographic printing presses and associated natural gas fired drying ovens. Emissions are captured via a NFE.

**Emission Units:** EUFLEXO2014, EUFLEXOTECH8CL

**POLLUTION CONTROL EQUIPMENT:** RTO

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	15.4 tpy	12-month rolling time period as determined at the end of each calendar month	FGFLEXOPRINT	SC VI.4 SC VI.5	R 336.1205, R 336.1702(a)
2. Hydrotreated Light Distillate (CAS No. 68410-97-9)	420 lb/yr	12-month rolling time period as determined at the end of each calendar month	FGFLEXOPRINT	SC VI.4 SC VI.5	R 336.1225(1)

**II. MATERIAL LIMITS**

NA

**III. PROCESS/OPERATIONAL RESTRICTIONS**

1. All waste inks, solvents, reducers, and other material (materials) shall be captured and stored in closed containers and shall be disposed of in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1225, R 336.1702(a))**
2. The permittee shall not operate FGFLEXOPRINT unless a malfunction abatement plan (MAP) as described in Rule 911(2), for satisfactory operation of the NFE and the RTO, has been submitted within 60 days of permit issuance, and is implemented and maintained. The MAP shall, at a minimum, specify the following:
  - a) A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
  - b) An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
  - c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1910, R 336.1911, 40 CFR 52.21(c) and (d))**

#### **IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee shall not operate FGFLEXOPRINT unless the NFE is installed, maintained and operated in a satisfactory manner. Satisfactory operation requires that the NFE is operating at a pressure lower than all adjacent areas, so that air flows into the NFE through all natural draft openings (NDOs). NDO is defined as any opening that is not connected to a duct in which a fan or blower is installed. **(R 336.1225, R 336.1702(a))**
2. The permittee shall not operate FGFLEXOPRINT unless the RTO is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the RTO requires a minimum VOC destruction efficiency of 96 percent (by weight), and maintaining a minimum temperature of 1475°F at the inlet of the thermal oxidizer. **(R 336.1205(1)(a)(ii), R 336.1225, R 336.1702(a), R 336.1910)**

#### **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The VOC content of any material, as received and as applied, shall be determined using federal Reference Test Method 24 or 24A pursuant to Rule 1040(5). Upon prior written approval by the AQD District Supervisor, VOC content may be determined from manufacturer's formulation data. If the Method 24 or 24A and the formulation values should differ, the Method 24 or 24A results shall be used to determine compliance. **(R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**
2. Upon request from the AQD District Supervisor, verification of the destruction efficiency of the RTO, by testing at owner's expense, in accordance with Department requirements may be required. No less than 60 days prior to testing, a complete test plan shall be submitted to the AQD. The final plan must be approved by the AQD prior to testing. Verification of capture efficiency and destruction efficiency includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. **(R 336.1225, R 336.1702(a), R 336.1910)**
3. The capture efficiency performance test of the NFE shall be conducted on quarterly basis. The permittee shall verify that the direction of air flow at each NDO for FGFLEXOPRINT is into the NFE. The verification of the direction of air flow at the NDOs shall be conducted using the smoke tube test method, or an alternate method approved by the AQD Technical Programs Unit and District Office. The permittee shall submit a notice of the anticipated test date to the AQD Technical Programs Unit and District Office no later than 30 days prior to the test date and a complete test report shall be submitted to the AQD Technical Programs Unit and District Office within 30 days after the completion of the testing. All test methods, plans, and procedures shall be approved by the AQD prior to testing. After two consecutive tests demonstrate that the direction of air flow at all NDOs is into the NFE, the permittee may request that the testing schedule be revised to a less frequent time period as approved by the AQD District Supervisor. **(R 336.1225, R 336.1702(a))**

#### **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the 21st day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. **(R 336.1205, R 336.1225, R 336.1702(a))**
2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device at the combustion chamber inlet of the RTO to monitor and record the temperature on a continuous basis, during operation of FGFLEXOPRINT. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1910)**

3. The permittee shall keep, in a satisfactory manner, operating temperature records for the RTO, as required by SC VI.2. If the measured operating temperature of the RTO falls below 1475°F during operation of FGFLEXOPRINT, compliance may be demonstrated based upon a three-hour average temperature, by calculating the average operating temperature for each three hour period which includes one or more temperature readings below 1475°F. All records and calculations shall be kept on file and made available to the Department upon request. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1910)**
4. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. All records shall be kept on file and made available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1702(a))**
5. The permittee shall keep the following information on a monthly basis for FGFLEXOPRINT:
  - a) The type of each material used. This includes but is not limited to inks, blanket wash/press wash or cleaning solvents, adhesives, ink-jet inks, makeup solvents, UV coatings, purge and clean-up solvents.
  - b) The VOC content of each material.
  - c) The usage rate (in pounds or gallons) of each material (in pounds or gallons).
  - d) The total reclaim and/or disposal amount (in pounds or gallons) of all waste material.
  - e) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
  - f) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
  - g) Hydrotreated light distillate (CAS No. 68410-97-9) mass emission calculations determining the monthly emission rate in pounds per calendar month.<sup>1</sup>
  - h) Hydrotreated light distillate (CAS No. 68410-97-9) mass emission calculations determining the annual emission rate in pounds per 12 month rolling time period as determined at the end of each calendar month.<sup>1</sup>

The permittee shall keep the records using mass balance or an alternate method and format acceptable to the AQD District Supervisor. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **(R 336.1225(1), R 336.1702(a))**

**VII. REPORTING**

NA

**VIII. STACK/VENT RESTRICTIONS**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Diameter/Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SVRTO	32	35	R 336.1225, 40 CFR 52.21(c) & (d)

**IX. OTHER REQUIREMENTS**

NA

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).