

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

October 21, 2016

PERMIT TO INSTALL
102-07B

ISSUED TO
Evergreen Packaging, Inc.

LOCATED AT
2315 Miller Road
Kalamazoo, Michigan

IN THE COUNTY OF
Kalamazoo

STATE REGISTRATION NUMBER
B8574

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:

September 7, 2016

DATE PERMIT TO INSTALL APPROVED:

October 21, 2016

SIGNATURE:

DATE PERMIT VOIDED:

SIGNATURE:

DATE PERMIT REVOKED:

SIGNATURE:

PERMIT TO INSTALL

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Common Abbreviations / Acronyms

Common Acronyms		Pollutant / Measurement Abbreviations	
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 ₂ e	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 ₂ 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 _x	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 ₁₀	Particulate Matter equal to or less than 10 microns in diameter
NSPS	New Source Performance Standards	PM _{2.5}	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 ₂	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.

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Installation Date / Modification Date	Flexible Group ID
EUSCRAPRECYCLE-1	Paper Trim Collection Baler. Stack ID: SVSCRAPRECYCLE-1	1951-1969 05/08/2009	FGSCRAP
EUSCRAPRECYCLE-2	Paper Trim Collection Baler. Stack ID: SVSCRAPRECYCLE-2	1951-1969 05/08/2009	FGSCRAP
EUPRESS-A	Flexographic Printing Press Including Cleaning Solvents. Stack ID: SVPress-A	1953 05/23/2007	FGPRESS1
EUPRESS-B	Flexographic Printing Press Including Cleaning Solvents. Stack ID: SVPress-B	1952 05/23/2007	FGPRESS1
EUPRESS-D	Flexographic Printing Press Including Cleaning Solvents. Stack ID: SVPress-D	1953 05/23/2007	FGPRESS2
EUPRESS-F	Flexographic Printing Press Including Cleaning Solvents. Stack ID: SVPress-F	06/30/2000 05/23/2007	FGPRESS1
EUPRESS-G	Flexographic Printing Press Including Cleaning Solvents. Stack ID: SVPress-G	06/30/2000 05/23/2007	FGPRESS1
EUPRESS-H	Flexographic Printing Press Including Cleaning Solvents. Stack ID: SVPress-H	06/30/2000 05/23/2007	FGPRESS2
EUPRESS-L	Flexographic Printing Press Including Cleaning Solvents. Stack ID: SVPress-L	05/23/2007 10/24/2016	NA
EUPRESS-M	Flexographic Printing Press Including Cleaning Solvents. Stack ID: SVPress-M	08/05/2002 05/23/2007	NA
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.			

The following conditions apply to: EUPRESS-L

DESCRIPTION: Flexographic Printing Press Including Cleaning Solvents. Stack ID: SVPress-L

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	7.3 tpy	12-month rolling time period as determined at the end of each calendar month	EUPRESS-L	SC VI.2,	R 336.1702(a)

II. MATERIAL LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC content of the inks and coatings	Shall not exceed 25%, by volume of the total volatile fraction, as applied Or The non-volatile fraction must be greater than 60% by volume of coating or ink, minus water, as applied	Instantaneous basis	EUPRESS-L	SC VI.1, SC VI.3	R 336.1702(a), R 336.1225

* The phrase "minus water" shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound. **(R 336.1602(4))**

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall capture all waste inks, cleanup solvents (e.g. press wash, roller wash), conditioner, transfer agent, antifoam, etc. (materials) and store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1205(3), R 336.1225, R 336.1702(a))**
2. The permittee shall handle all VOC and/or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1205(3), R 336.1225, R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

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

1. The permittee shall determine the VOC content of any material, as received and as applied, using federal Reference Test Method 24/24A pursuant to Rule 1040(5). Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24/24A and the formulation values should differ, the permittee shall use the Method 24/24A results to determine compliance. **(R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205(3), R 336.1225, R 336.1702(a) & (d))**
2. The permittee shall keep a separate written record of the following for EUPRESS-L on a monthly averaging period:
 - a. The type of each material used. This includes but is not limited to inks, fountain solutions, 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, with water and without water and exempt solvents, (in percent by weight or pounds per gallon), as received and as applied.
 - c. The usage rate (in pounds or gallons) of each material as applied.
 - d. The amount (in pounds) of each material reclaimed.
 - e. VOC emission calculations determining the monthly emission rate in pounds per calendar month.
 - f. VOC emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance or an alternate method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205, R 336.1225, R 336.1702(a))**

3. 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. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1702)**

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:

Stack & Vent ID	Maximum Exhaust Diameter/ Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVPress-L	10 x 16	43	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENTS

NA

The following conditions apply to: EUPRESS-M

DESCRIPTION: Flexographic Printing Press Including Cleaning Solvents. Stack ID: SVPress-M

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	7.3 tpy	12-month rolling time period as determined at the end of each calendar month	EUPRESS-M	SC VI.1, SC VI.2, SC VI.3	R 336.1205(3), R 336.1702(d)
2. VOC content of the inks and coatings	Shall not exceed 25%, by volume of the total volatile fraction, as applied Or The non-volatile fraction must be greater than 60% by volume of coating or ink, minus water, as applied	A calendar day averaging period per emission unit	EUPRESS-M	SC VI.1, SC VI.2, SC VI.3	R 336.1702(d), R 336.1225
* The phrase "minus water" shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound. (R 336.1602(4))					

II. MATERIAL LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC content of the inks and coatings	Shall not exceed 25%, by volume of the total volatile fraction, as applied Or The non-volatile fraction must be greater than 60% by volume of coating or ink, minus water, as applied	Instantaneous basis	EUPRESS-M	SC VI.1, SC VI.3	R 336.1702(a), R 336.1225
* The phrase "minus water" shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound. (R 336.1602(4))					
Note: The permittee shall comply with SC I.2 or SC II.1					

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall capture all waste inks, cleanup solvents (e.g. press wash, roller wash), conditioner, transfer agent, antifoam, etc. (materials) and store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1205(3), R 336.1225, R 336.1702(a), R 336.1901)**
2. The permittee shall handle all VOC and/or HAP containing materials, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1205(3), R 336.1225, R 336.1702(a), R 336.1901)**

IV. DESIGN/EQUIPMENT PARAMETERS

NA

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 (inks, coatings, fountain solution additives and cleaning solvents) or 24A (only applies to solvent-borne inks and related coatings used in the publication rotogravure industry) 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))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205(3), R 336.1225, R 336.1702(a) or (d))**
2. The permittee shall keep a written record of the following for the EUPRESS-M on a calendar month averaging period:
 - a. The type of each material used.
 - b. Chemical composition of each material, including weight percent of each component.
 - c. The VOC content of each material, without water and exempt solvents, (in percent by weight or pounds per gallon), as received and as applied.
 - d. The usage rate (in pounds or gallons) of each material as applied.
 - e. The amount (in pounds or gallons) of material reclaimed.
 - f. VOC 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. VOC emission calculations determining the volume of VOCs in the inks and coatings, as a percentage of the total volatile fraction, including water, on a daily basis, based upon a calendar day averaging period; or the non-volatile volume fraction of the inks and coatings as a percent of the ink or coating total volume, minus water, based upon a calendar day averaging period.
Or
 - h. VOC content of the inks and coatings, as a percentage of the total volatile fraction, including water, on an instantaneous basis; or the non-volatile volume fraction of the inks and coatings as a percent of the ink or coating total volume, minus water, based upon instantaneous.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(3), R 336.1225, R 336.1702(a) or (d))**

3. 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. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1225, R 336.1702, R 336.1901)**

VII. REPORTING

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EUPRESS-L. **(R 336.1201(7)(a))**

VIII. STACK/VENT RESTRICTIONS

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

Stack & Vent ID	Maximum Exhaust Diameter/ Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVPress-M	16 x 14	32	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENTS

1. Within 30 days of issuance of this permit, the permittee shall label the EUPRESS-M according to a method acceptable to the AQD District Supervisor. Within seven days of completing the labeling, the permittee shall notify the AQD District Supervisor, in writing, as to the date the labeling was completed. **(R 336.1201)**

Footnotes:

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

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGPRESS2	Two Flexographic Printing Presses Including Cleaning Solvents. Stack ID: SVPress-D, SVPress-H	EUPRESS-D, EUPRESS-H
FGPRESS1	Four Flexographic Printing Presses Including Cleaning Solvents. Stack ID: SVPress-A, SVPress-B, SVPress-F, SVPress-G	EUPRESS-A, EUPRESS-B, EUPRESS-F, EUPRESS-G
FGSCRAP	Paper Trim Collection Balers	EUSCRAPRECYCLE-1, EUSCRAPRECYCLE-2
FGFacility	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	NA

The following conditions apply to: FG PRESS2

DESCRIPTION: Two Flexographic Printing Presses Including Cleaning Solvents. Stack ID: SVPress-D and SVPress-H

Emission Unit ID: EUPRESS-D, EUPRESS-H

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	7.3 tpy	12-month rolling time period as determined at the end of each calendar month	EUPRESS-D	SC VI.1, SC VI.2, SC VI.3	R 336.1205(3), R 336.1702(d)
2. VOC	7.3 tpy	12-month rolling time period as determined at the end of each calendar month	EUPRESS-H	SC VI.1, SC VI.2, SC VI.3	R 336.1205(3), R 336.1702(d)
3. VOC content of the inks and coatings	Shall not exceed 25%, by volume of the total volatile fraction, as applied Or The non-volatile fraction must be greater than 60% by volume of coating or ink, minus water, as applied	A calendar day averaging period per emission unit (EUPRESS-D, EUPRESS-H)	EUPRESS-D, EUPRESS-H	SC VI.1, SC VI.2, SC VI.3	R 336.1702(d), R 336.1225
* The phrase "minus water" shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound. (R 336.1602(4))					

II. MATERIAL LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC content of the inks and coatings	Shall not exceed 25%, by volume of the total volatile fraction, as applied Or The non-volatile fraction must be greater than 60% by volume of coating or ink, minus water, as applied	Instantaneous basis	EUPRESS-D, EUPRESS-H	SC VI.1, SC VI.3	R 336.1702(a), R 336.1225
* The phrase "minus water" shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound. (R 336.1602(4))					
Note: The permittee shall comply with SC I.3 or SC II.1					

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall capture all waste inks, cleanup solvents (e.g. press wash, roller wash), conditioner, transfer agent, antifoam, etc. (materials) and store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1205(3), R 336.1225, R 336.1702(a), R 336.1901)**
2. The permittee shall handle all VOC and/or HAP containing materials, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1205(3), R 336.1225, R 336.1702(a), R 336.1901)**

IV. DESIGN/EQUIPMENT PARAMETERS

NA

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 (inks, coatings, fountain solution additives and cleaning solvents) or 24A (only applies to solvent-borne inks and related coatings used in the publication rotogravure industry) 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))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205(3), R 336.1225, R 336.1702(a) or (d))**
2. The permittee shall keep a separate written record of the following for the EUPRESS-D and EU-Press-H on a calendar month averaging period:
 - a. The type of each material used for each emission unit.
 - b. Chemical composition of each material, including weight percent of each component.
 - c. The VOC content of each material, without water and exempt solvents, (in percent by weight or pounds per gallon), as received and as applied.
 - d. The usage rate (in pounds or gallons) of each material as applied for each emission unit.
 - e. The amount (in pounds or gallons) of material reclaimed for each emission unit.
 - f. VOC emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month for each emission unit.
 - g. VOC emission calculations determining the volume of VOCs in the inks and coatings, as a percentage of the total volatile fraction, including water, on a daily basis, based upon a calendar day averaging period; or the non-volatile volume fraction of the inks and coatings as a percent of the ink or coating total volume, minus water, based upon a calendar day averaging period.
Or
 - h. VOC content of the inks and coatings, as a percentage of the total volatile fraction, including water, on an instantaneous basis; or the non-volatile volume fraction of the inks and coatings as a percent of the ink or coating total volume, minus water, based upon instantaneous.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(3), R 336.1225, R 336.1702(a) or (d))**

3. 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. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1225, R 336.1702, R 336.1901)**

VII. REPORTING

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EUPRESS-D and EUPRESS-H. **(R 336.1201(7)(a))**

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:

Stack & Vent ID	Maximum Exhaust Diameter/ Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVPress-D	10 x 16	32	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
2. SVPress-H	10 x 16	32	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENTS

1. Within 30 days of issuance of this permit, the permittee shall label the EUPRESS-D and EUPRESS-H according to a method acceptable to the AQD District Supervisor. Within seven days of completing the labeling, the permittee shall notify the AQD District Supervisor, in writing, as to the date the labeling was completed. **(R 336.1201)**

Footnotes:

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

The following conditions apply to: FG PRESS1

DESCRIPTION: Four Flexographic Printing Presses Including Cleaning Solvents. Stack ID: SVPress-A, SVPress-B SVPress-F, and SVPress-G

Emission Unit ID: EUPRESS-A, EUPRESS-B, EUPRESS-F, and EUPRESS-G

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	7.3 tpy	12-month rolling time period as determined at the end of each calendar month	EUPRESS-A	SC VI.1, SC VI.2, SC VI.3	R 336.1205(3), R 336.1702(d)
2. VOC	7.3 tpy	12-month rolling time period as determined at the end of each calendar month	EUPRESS-B	SC VI.1, SC VI.2, SC VI.3	R 336.1205(3), R 336.1702(d)
3. VOC	7.3 tpy	12-month rolling time period as determined at the end of each calendar month	EUPRESS-F	SC VI.1, SC VI.2, SC VI.3	R 336.1205(3), R 336.1702(d)
4. VOC	7.3 tpy	12-month rolling time period as determined at the end of each calendar month	EUPRESS-G	SC VI.1, SC VI.2, SC VI.3	R 336.1205(3), R 336.1702(d)
5. VOC content of the inks and coatings	Shall not exceed 25%, by volume of the total volatile fraction, as applied Or The non-volatile fraction must be greater than 60% by volume of coating or ink, minus water, as applied	A calendar day averaging period per emission unit (EUPRESS-A, EUPRESS-B, EUPRESS-F, EUPRESS-G)	EUPRESS-A, EUPRESS-B, EUPRESS-F, EUPRESS-G	SC VI.1, SC VI.2, SC VI.3	R 336.1702(d), R 336.1225
* The phrase "minus water" shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound. (R 336.1602(4))					

II. MATERIAL LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC content of the inks and coatings	Shall not exceed 25%, by volume of the total volatile fraction, as applied Or The non-volatile fraction must be greater than 60% by volume of coating or ink, minus water, as applied	Instantaneous basis	EUPRESS-A, EUPRESS-B, EUPRESS-F, EUPRESS-G	SC VI.1, SC VI.3	R 336.1702(a), R 336.1225
<p>* The phrase "minus water" shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound. (R 336.1602(4))</p> <p>Note: The permittee shall comply with SC I.5 or SC II.1</p>					

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall capture all waste inks, cleanup solvents (e.g. press wash, roller wash), conditioner, transfer agent, antifoam, etc. (materials) and store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1205(3), R 336.1225, R 336.1702(a), R 336.1901)**
2. The permittee shall handle all VOC and/or HAP containing materials, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1205(3), R 336.1225, R 336.1702(a), R 336.1901)**

IV. DESIGN/EQUIPMENT PARAMETERS

NA

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 (inks, coatings, fountain solution additives and cleaning solvents) or 24A (only applies to solvent-borne inks and related coatings used in the publication rotogravure industry) 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))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205(3), R 336.1225, R 336.1702(a) or (d))**
2. The permittee shall keep a separate written record of the following for the EUPRESS-A, EUPRESS-B, EUPRESS-F, and EU-Press-G on a calendar month averaging period:
 - a. The type of each material used for each emission unit.
 - b. Chemical composition of each material, including weight percent of each component.
 - c. The VOC content of each material, without water and exempt solvents, (in percent by weight or pounds per gallon), as received and as applied.
 - d. The usage rate (in pounds or gallons) of each material as applied for each emission unit.
 - e. The amount (in pounds or gallons) of material reclaimed for each emission unit.
 - f. VOC emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month for each emission unit.
 - g. VOC emission calculations determining the volume of VOCs in the inks and coatings, as a percentage of the total volatile fraction, including water, on a daily basis, based upon a calendar day averaging period; or the non-volatile volume fraction of the inks and coatings as a percent of the ink or coating total volume, minus water, based upon a calendar day averaging period.
Or
 - h. VOC content of the inks and coatings, as a percentage of the total volatile fraction, including water, on an instantaneous basis; or the non-volatile volume fraction of the inks and coatings as a percent of the ink or coating total volume, minus water, based upon instantaneous.

The permittee shall keep the records using mass balance or an alternate method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(3), R 336.1225, R 336.1702(a) or (d))**

3. 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. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1225, R 336.1702, R 336.1901)**

VII. REPORTING

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EUPRESS-A, EUPRESS-B, EUPRESS-F, and EUPRESS-G. **(R 336.1201(7)(a))**

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:

Stack & Vent ID	Maximum Exhaust Diameter/ Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVPress-A	16 x 14	32	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
2. SVPress-B	16 x 14	32	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
3. SVPress-F	16 x 14	32	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
4. SVPress-G	16 x 14	32	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENTS

1. Within 30 days of issuance of this permit, the permittee shall label the EUPRESS-A, EUPRESS-B, EUPRESS-F, and EUPRESS-G according to a method acceptable to the AQD District Supervisor. Within seven days of completing the labeling, the permittee shall notify the AQD District Supervisor, in writing, as to the date the labeling was completed. **(R 336.1201)**

Footnotes:

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

The following conditions apply to: FGSCRAP

DESCRIPTION: Paper Trim Collection Balers. Stack ID: SVSCRAPRECYCLE-1 and SVSCRAPRECYCLE-2

Emission Unit ID: EUSCRAPRECYCLE-1 and EUSCRAPRECYCLE-2

POLLUTION CONTROL EQUIPMENT: Cyclone collectors system

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM	0.014 lbs per 1000 lbs of exhaust gases*	Test Protocol	FGSCRAP	GC 13	R 336.1331
2. PM10	1.2 pph	Test Protocol	FGSCRAP	GC 13	R 336.2803, R 336.2804, 40 CFR 52.21 Subparts (c) & (d)
* Calculated on a dry gas basis					

3. Visible emissions from FGSCRAP shall not exceed a six-minute average of 10 percent opacity. **(R 336.1301, R 336.1331, 40 CFR 52.21)**

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate FGSCRAP unless the cyclones collectors are installed, maintained, and operated in a satisfactory manner. **(R 336.1205(3), R 336.1224, R 336.1331, R 336.1901, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))**

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep, in a satisfactory manner, records of all visible emission readings for each stack associated with the FGSCRAP. At a minimum, records shall include the date, time, name of observer/reader, whether the reader is certified, and status of visible emissions. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1301, R 336.1303)**

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:

Stack & Vent ID	Maximum Exhaust Diameter/ Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVSCRAPRECYCLE-1	120	42	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
2. SVSCRAPRECYCLE-2	120	42	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENTS

NA

Footnotes:

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

The following conditions apply Source-Wide to: FGFACILITY

DESCRIPTION: All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Each Individual HAP	Less than 8.9 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)
2. Aggregate HAPs	Less than 22.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

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

1. The permittee shall determine the HAP content of any all waste inks, cleanup solvents (e.g. press wash, roller wash), conditioner, transfer agent, antifoam, etc. (material), as received/as applied, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311. **(R 336.1205(3))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205(3))**
2. The permittee shall keep the following information on a calendar month basis for FGFACILITY:
 - a. Gallons or pounds of each HAP containing material used.
 - b. Where applicable, gallons or pounds of each HAP containing material reclaimed.
 - c. HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used.
 - d. Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
 - e. Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance or an alternate method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(3))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA