

PUBLIC NOTICE

Graphic Packaging International, LLC has applied to the Tennessee Department of Environment and Conservation, Division of Air Pollution Control for renewal of their major source (Title V) operating permit subject to the provisions of Tennessee Air Pollution Control Regulations 1200-03-09-.02(11) (Title V Regulations). A major source operating permit is required by both the Federal Clean Air Act and Tennessee's air pollution control regulations. However, it should be noted that this facility has a current major source operating permit.

The applicant is **Graphic Packaging International, LLC** with a site address of 2006 Liberty Avenue. They have applied for renewal of their existing major source (Title V) operating permit for their folding carton manufacture operation.

EPA has agreed to treat this draft Part 70 permit as a proposed Part 70 permit and to perform its 45-day review provided by the law concurrently with the public notice period. If any substantive comments are received, EPA's 45-day review period will cease to be performed concurrently with the public notice period. In this case, EPA's 45-day review period will start once the public notice period has been completed and EPA receives notification from the Tennessee Air Pollution Control Division that comments have been received and resolved. The status regarding EPA's 45-day review of these permits and the deadline for submitting a citizen's petition can be found at the following website address:

<https://www.epa.gov/caa-permitting/tennessee-proposed-title-v-permits>

Copies of the application materials and draft permits are available for public inspection during normal business hours at the following locations:

Columbia Environmental Field Office 1421 Hampshire Pike Columbia, TN 38401	and	Tennessee Department of Environment and Conservation Division of Air Pollution Control William R. Snodgrass Tennessee Tower 312 Rosa L. Parks Avenue, 15th Floor Nashville, TN 37243
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Electronic copies of the draft permits are available by accessing the TDEC internet site located at:

<https://www.tn.gov/environment/ppo-public-participation/ppo-public-participation/ppo-air.html>

Questions concerning the source(s) may be addressed to S. Deloach at (615) 532-0608 or by e-mail at Shandia.Deloach@tn.gov.

Interested parties are invited to review these materials and comment. In addition, a public hearing may be requested at which written or oral presentations may be made. To be considered, written comments or requests for a public hearing must be received no later than 4:30 PM on October 29, 2022. To assure that written comments are received and addressed in a timely manner, written comments must be submitted using one of the following methods:

1. **Mail, private carrier, or hand delivery:** Address written comments to Ms. Michelle W. Owenby, Director, Division of Air Pollution Control, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue 15th Floor, Nashville, Tennessee 37243.
2. **E-mail:** Submit electronic comments to air.pollution.control@tn.gov.

A final determination will be made after weighing all relevant comments.

Individuals with disabilities who wish to review information maintained at the above-mentioned depositories should contact the Tennessee Department of Environment and Conservation to discuss any auxiliary aids or services needed to facilitate such review. Such contact may be in person, by writing, telephone, or other means, and should be made no less than ten days prior to the end of the public comment period to allow time to provide such aid or services. Contact the Tennessee Department of Environment and Conservation ADA Coordinator, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue 22nd Floor, Nashville, TN 37243, 1-(866)-253-5827. Hearing impaired callers may use the Tennessee Relay Service, 1-(800)-848-0298.

STATEMENT OF BASIS FOR 50-0054

TITLE V PERMIT #579087

Renewal #3

Facility Name:	Graphic Packaging International, LLC
City:	Lawrenceburg
County:	Lawrence

Date (3rd renewal) Application Received: May 28, 2021
Date Application Deemed Complete: May 28, 2021

Emission Source Reference No.: 50-0054
Permit No.: 579087

INTRODUCTION

This narrative is being provided to assist the reader in understanding the content of the attached Title V Renewal operating permit. This Title V permit statement is written pursuant to Tennessee Air Pollution Control Rule 1200-03-09-.02(11)(f)1.(v).. The primary purpose of the Title V operating permit is to consolidate and identify existing state and federal air requirements applicable to **Graphic Packaging International, LLC**. and to provide practical methods for assuring compliance with these requirements. The following narrative is designed to accompany the Title V Operating Permit. It initially describes the facility receiving the permit, then the applicable requirements and their significance, and finally the compliance status with those applicable requirements. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public participation process will be described in an addendum to this narrative.

Acronyms

PSD - Prevention of Significant Deterioration

NESHAP - National Emission Standards for Hazardous Air Pollutants

NSPS - New Source Performance Standards

MACT - Maximum Achievable Control Technology

NSR - New Source Review

I. Identification Information.

A. Source Description. Graphic Packaging International, LLC is a facility that produces customized packaging through the use of rotogravure printing and painting on polyethylene film and folding cartons

The following sources are listed in the Title V (3rd renewal) permit

List and describe emission source(s):

50-0054-02: 2 Paperboard laminating Lines

50-0054-03: Ink System

50-0054-04: 2 Rotogravure presses

50-0054-06: 5 paperboard cutters

50-0054-08: 10 Folder gluers

50-0054-09: 2 Metallizers

50-0054-12: 1 12,000-gallon storage tank

- 50-0054-13: Rechrome Shop
- 50-0054-14: 1 Flexographic printer
- 50-0054-15: 1 Flexographic printer
- 50-0054-17: 1 10-station Flexographic printer

Insignificant Activities listed in application

- 2 – 6000 gallon solvent storage tanks
- Reclaimed press solvent storage tank (distillation room)
- Dirty press solvent storage tank, located in Ink Room
- 2 – 6000 gallon solvent storage tanks adjacent to Ink Systems
- Print Trolley, pump washer
- Laminator #3 LP board treater LP gas usage (1,360,000 BTU/hr)
- Carton Flame sealing using LP gas (2,050,000 BTU/hr)
- Paperboard Roll Slitter / Rewinder
- Gluers (source 08)

B. Facility Classification.

1. **Attainment or Non-Attainment Area Location.** Area is designated as an attainment area for all criteria pollutants.
2. Company is located in a Class II Area for PSD purposes.

C. Regulatory Status.

1. **PSD/NSR.** This facility *is* a major source under PSD.
2. Title V Major Source Status by Pollutant

Pollutant	Is the pollutant emitted?	If emitted, what is the facility's status?	
		Major Source Status	Non-Major Source Status
PM	Yes	Yes	No
PM ₁₀	Yes	<i>included in PM</i>	<i>included in PM</i>
SO ₂	Yes	No	Yes
VOC	Yes	Yes	No
NO _x	Yes	No	Yes
CO	Yes	No	Yes
Individual HAP	Yes	No	Yes
Total HAPs	Yes	No	Yes
CO _{2e}	Yes	No	Yes

3. MACT Standards

The following MACT standard applies to this facility:

40 CFR Part 63 Subpart N - National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks

4. Program Applicability: Are the following programs applicable to the facility?

PSD: (Yes)
NESHAP: (No) -
NSPS: (Yes) – 40 CFR 60 Subpart Kb

II. Compliance Information

A. Compliance Status

Is the facility currently in compliance with all applicable requirements? *yes*

Are there any applicable requirements that will become effective during the permit term? *No.*

If yes, explain.

III. Other Requirements

A. Emissions Trading

The facility is not involved in an emission-trading program.

B. Acid Rain Requirements

This facility is not subject to any requirements in Title IV of the Clean Air Act.

C. Greenhouse Gas Emissions

Graphic Packaging International Inc's GHG emission potential is 3225 tons per year of CO₂e.

D. Prevention of Accidental Releases: Applicable OR Not applicable

Not Applicable

IV. Public Participation Procedures.

Notification of this draft permit and public notice were mailed to the following environmental agencies:

1. EPA Region IV
2. Alabama Department of Environmental Management

RESPONSE TO COMMENTS

General Information

Facility Name: Graphic Packaging International Inc.
Emission Source Reference No. 50-0054
Permit No.: 579087
Date Renewal Application Received: May 28, 2021

Date Application Deemed Complete: May 28, 2021
Date of Public Notice:
Date of Public Hearing:

Comment Summary

Commenter	Comment	Response

V. Permit History:

Title V Operating Permit No. 570561 was the second renewal of the original Title V Permit No. 555930 issued March 29, 2004 and subsequent renewal permit No. 562333 issued February 10, 2011.

Operational Flexibility (March 8, 2016)

- Addition of a carton folder/gluer (in addition to 9 existing units, source 50-0054-08) for flexibility to their gluing operation. No emission increase nor increase in throughput. TAPCR 1200-03-09-.01(4)

Operational Flexibility (January 15, 2015)

- Addition of cyclone/separators (identified as C5) and horizontal baler in the Laminated area (source 50-0054-02) for flexibility to their operation. No emission increases. TAPCR 1200-03-09-.02(11)(a)4

Operational Flexibility (December 11, 2012)

- Addition of one cutter in addition to 4 existing cutters for quick product changeovers and flexibility to their operation (source 50-0054-06). No emission increases. TAPCR 1200-03-09-.02(11)(a)4

Minor Modification # 1 (issued on December 7, 2012)

- Graphic Packaging International Inc applied for permission to make minor modifications to their Title V by requesting to add one (1) 10-Station Flexographic UV Printer (source 50-0054-17).
- New source (50-0054-17): addition of a new 10-station UV flexo printer. TAPCR 1200-03-09-.01(4)
Permit condition E1 (the fee emission summary table) changes as the tons per year allowable emissions for VOC goes up by 0.9 tons/year.
- New permit conditions E15-1 through E15-4 have been added for this modification.

Changes since issuance of permit 570561

Addendum #1
Administrative Amendment #1

The purpose of this addendum is to list the changes contained in the Administrative Amendment #1 to Title V Permit No. 570561. The Title V permit was issued on December 15, 2016.

I. Administrative Amendment #1

(1) Condition E2(b)(AA1) has been revised to include the updated version and adding a new condition E3-7 (AA1) for log data entry timeline.

Addendum #2
Minor Modification #1 for GPI; 50-0054 (Log 77276)

The purpose of this addendum is to list the changes contained in this Minor Permit Modification #1 to Title V Permit No. 570561. The Title V permit was issued on December 15, 2016.

On June 1, 2018 Graphic Packaging International Inc., (GPI) has applied for a minor modification #1 to their Title V Air Emissions Permit consisting of the following proposed changes to their packaging and printing operation:

50-0054: GPI has requested to change the frequency of record keeping for Material usage and emissions calculations set under original PSD/LAER permit review process from daily to a monthly averaging period. The Division has agreed to a monthly averaging period only for those sources, which were not originally subject to the PSD/LAER review process. The sources which were originally subject to PSD/LAER review process would need to go through reopening/revisiting the PSD/LAER review, before those requirements could be changed. As such, through this minor modification, only sources 50-0054-15 and 50-0054-17 are allowed to switch to monthly averaging limits. This change is being made in accordance with 1200-03-09-.02(11)(f)5(ii) of the Tennessee Air Pollution Control Regulations.

Accordingly, Conditions E13-2 (MM1) and E15-1 (MM1) have been modified to allow compliance demonstration on a monthly average basis.

Public Participation Procedures.

Notification of this minor mod. Request was mailed to the following environmental agencies:

EPA Region IV
Alabama Department of Environmental Management

Addendum #3
Minor Modification #2 for GPI; 50-0054 (Permit 570561, Log 92758)

The purpose of this addendum is to list the changes contained in Minor Permit Modification #2 to Title V Permit No. 570561.

On December 4, 2018 Graphic Packaging International Inc., (GPI) applied for a minor modification to their Title V Permit consisting of the following proposed changes to their packaging and printing operation:

50-0054: GPI has requested to change the frequency of record keeping for material usage and emissions calculations set under the original PSD/LAER permit review process. After a careful review of the original PSD/LAER construction permits, it was determined that the recordkeeping frequency was not specified in the original PSD/LAER permits and the facility was demonstrating compliance with Tenn. Com. R. & Regs. 1200-03-18-.35 on the applicable emission units by either compliant coatings or a control device (and not calculating a daily weighted average, which would require daily record keeping). The recordkeeping frequency change to monthly average will not change the emission standard or emissions, nor will it make any change in method of compliance demonstration. Therefore, the Division agrees with the company's request for changing the recordkeeping frequency averaging period from daily to monthly average basis. As such, through this minor modification, sources 50-0054-04 and 50-0054-14 are allowed to revise the recordkeeping frequency averaging period from a daily to a monthly average basis. This change is being made in accordance with 1200-03-09-.02(11)(f)5(ii) of the Tennessee Air Pollution Control Regulations. Additional revisions to sources 50-0054-15 and 50-0054-17 are also being made to clarify that recordkeeping and emission calculations for these sources should be performed on a monthly basis.

Emission sources 50-0054-03 and 50-0054-09, also included in the request for changes to monitoring frequency, have not been modified. These sources are uncontrolled, and are not subject to Tenn. Comp. R. & Regs. 1200-03-18-.35. PSD/LAER was determined to be actual emissions and good operating practices in the PSD permits issued in November 1988. The hourly VOC emission limits established in the permits are PSD/LAER, and therefore they cannot be changed.

Accordingly, Conditions E3-4, E6-1, E6-2, E8-3, E9-1, E12-1, E12-2, E12-3, E13-2, E15-1, and E15-3 have been modified to allow recordkeeping and emission calculation on a monthly average basis.

Condition A12 was revised to include a slight change in wording.

Condition A20 was revised to require annual certification for facilities complying with the requirements of a Risk Management Plan, if subject to the requirements of 112(r).

Conditions B6 and E2(b) were revised to update the name of the EPA Branch due to restructuring at EPA.

Condition D7 was revised to remove the word "oil".

Condition E1 was revised to remove the designation of fee payment type, remove the specific source references from the table, remove N/A from the VOC allowable cell, and add AEAR to the PM HAP actual emissions cell.

Condition E2(a) was revised to add conditions E8-3 and E15-1, and remove conditions E11-1, E11-2, and E13-2 (duplicate).

Condition E4-1 was revised to reflect the current format for a condition providing a statement of the design capacity of a source.

Conditions E5-1, E5-2, and E9-1 were modified to clarify that daily recordkeeping is required.

Addendum #4
Administrative Amendment #2 for GPI; 50-0054 (Permit 570561, Log 124969)

The purpose of this addendum is to list the changes contained in Administrative Amendment #2 to Title V Permit No. 570561.

On December 26, 2019 Graphic Packaging International Inc., (GPI) applied for a minor modification to their Title V Permit consisting of the following proposed changes to compliance method for chromium emissions:

50-0054: GPI has requested amendment to clarify the requirements of condition E11-2. After review the second decimal place was not necessary to demonstrate compliance with **40 CFR 63.343(c)(2)**. **So the second decimal place was dropped.**

Accordingly, Condition E11-2 has been modified to allow for compliance that is clearer.

Three other conditions were also updated. E3-3 was given a compliance demonstration, E3-5 was given additional language for clarity, and E6-2 was given an annual limit based on 8760 hours.

Addendum #5
Significant Modification #1 for GPI; 50-0054 (Permit 570561, Log 110990)

The purpose of this addendum is to list the changes contained in Significant Modification #1 to Title V Permit No. 570561.

On June 19, 2019 Graphic Packaging International Inc., (GPI) applied for a significant modification to their Title V Permit consisting of the following proposed changes in recordkeeping for VOC emissions:

Conditions E5-1, E5-2, and E9-1 were modified to require monthly rather than daily recordkeeping.

Condition E3-4 was modified to remove the daily VOC recordkeeping log as it would no longer be required by any of the sources listed in E3-4.

Condition E3-6 was updated to reflect the current application data.

Title V Permit number 579087

Title V Operating Permit No. 579087 represents the third renewal of the original Title V Permit No. 555930 issued March 29, 2004, subsequent renewal permit number 562333 issued February 10, 2011, and subsequent renewal permit No. 570561 issued December 15, 2016. Changes incorporated with this renewal include in condition E4-1 added references to the PSD permits, add rule citation to E5-3, add rule citation in condition E6-5, add rule citation in E7-1, add rule citation in E8-1, add rule citation in condition E8-3, added condition E9-3 for visible emissions, condition E13-1 added compliance and rule citation. Added the general provisions as attachments. Verified the VOC emissions from source 13 are accounted for in condition E3-4. Clarified the application emissions of VOC from source 12. The 0.4 tpy emissions are include for fee purposes and come from non-process emissions from solvents used for cleaning.

STATE OF TENNESSEE
AIR POLLUTION CONTROL BOARD
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243



OPERATING PERMIT (TITLE V) Issued Pursuant to Tennessee Air Quality Act

This permit fulfills the requirements of Title V of the Federal Clean Air Act (42 U.S.C. 7661a-7661e) and the federal regulations promulgated thereunder at 40 CFR Part 70. (FR Vol. 57, No. 140, Tuesday, July 21, 1992 p.32295-32312). This permit is issued in accordance with the provisions of paragraph 1200-03-09-.02(11) of the Tennessee Air Pollution Control Regulations (TAPCR). The permittee has been granted permission to operate an air contaminant source in accordance with emissions limitations and monitoring requirements set forth herein.

Date Issued: TBD

Permit Number:

Date Expires: TBD

579087

Issued To:

Graphic Packaging International, LLC

Installation Address:

2006 Liberty Avenue
Lawrenceburg

Installation Description: Folding carton manufacture including rotogravure printing of polyethylene film

50-0054-02: 2 Paperboard laminating Lines	50-0054-08: 10 Folder gluers	50-0054-14: 1 Flexographic printer
50-0054-03: Ink System	50-0054-09: 2 Metallizers	50-0054-15: 1 Flexographic printer
50-0054-04: 2 Rotogravure presses	50-0054-12: 1 12,000-gallon storage tank	50-0054-17: 1 10-station Flexographic printer
50-0054-06: 5 paperboard cutters	50-0054-13: Rechrome Shop	

Facility ID: 50-0054

Renewal Application Due Date:

Between ***** and *****

Primary SIC: 2745

Information Relied Upon:

Renewal Application dated May 27, 2021
Updated Application forms dated March 22, 2022

(continued on the next page)

TECHNICAL SECRETARY

No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.

POST AT INSTALLATION ADDRESS

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ATTACHMENT 1	Opacity Matrix Decision Tree for Visible Emission Evaluation by Methods 2 and 9	2 pages
ATTACHMENT 2	Title V Fee Selection Form	2 pages
ATTACHMENT 3	General Provisions for 40 CFR Part 60, Subpart Kb	1 page
ATTACHMENT 4	General Provisions for 40 CFR 63, Subpart N	1 page

SECTION A

GENERAL PERMIT CONDITIONS

A permit issued under the provisions of paragraph 1200-03-09-.02(11) is a permit issued pursuant to the requirements of Title V of the Federal Act and its implementing Federal regulations promulgated at 40 CFR, Part 70.

- A1. Definitions.** Terms not otherwise defined in the permit shall have the meaning assigned to such terms in the referenced regulation.

TAPCR 1200-03

- A2. Compliance requirement.** All terms and conditions in a permit issued pursuant to paragraph 1200-03-09-.02(11) including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act.

The permittee shall comply with all conditions of its permit. Except for requirements specifically designated herein as not being federally enforceable (State Only), non-compliance with the permit requirements is a violation of the Federal Act and the Tennessee Air Quality Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Non-compliance with permit conditions specifically designated herein as not being federally enforceable (State Only) is a violation of the Tennessee Air Quality Act and may be grounds for these actions.

TAPCR 1200-03-09-.02(11)(e)2(i) and 1200-03-09-.02(11)(e)1(vi)(I)

- A3. Need to halt or reduce activity.** The need to halt or reduce activity is not a defense for noncompliance. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. However, nothing in this item shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations.

TAPCR 1200-03-09-.02(11)(e)1(vi)(II)

- A4. The permit.** The permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

TAPCR 1200-03-09-.02(11)(e)1(vi)(III)

- A5. Property rights.** The permit does not convey any property rights of any sort, or any exclusive privilege.

TAPCR 1200-03-09-.02(11)(e)1(vi)(IV)

- A6. Submittal of requested information.** The permittee shall furnish to the Technical Secretary, within a reasonable time, any information that the Technical Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or termination of the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Technical Secretary copies of records required to be kept by the permit. If the permittee claims that such information is confidential, the Technical Secretary may review that claim and hold the information in protected status until such time that the Board can hear any contested proceedings regarding confidentiality disputes. If the information is desired by EPA, the permittee may mail the information directly to EPA. Any claims of confidentiality for federal purposes will be determined by EPA.

TAPCR 1200-03-09-.02(11)(e)1(vi)(V)

- A7. Severability clause.** The requirements of this permit are severable. A dispute regarding one or more requirements of this permit does not invalidate or otherwise excuse the permittee from their duty to comply with the remaining portion of the permit.

TAPCR 1200-03-09.02(11)(e)1(v)

A8. Fee payment.

(a) The permittee shall pay an annual Title V emission fee based upon the responsible official's choice of actual emissions, allowable emissions, or a combination of actual and allowable emissions; and on the responsible official's choice of annual accounting period. An emission cap of 4,000 tons per year per regulated pollutant per major source SIC Code shall apply to actual or allowable based emission fees. A Title V annual emission fee will not be charged for emissions in excess of the cap. Title V annual emission fees will not be charged for carbon monoxide or for greenhouse gas pollutants solely because they are greenhouse gases.

(b) Title V sources shall pay allowable based emission fees until the beginning of the next annual accounting period following receipt of their initial Title V operating permit. At that time, the permittee shall begin paying their Title V fee based upon their choice of actual or allowable based fees, or mixed actual and allowable based fees. Once permitted, the Responsible Official may revise their existing fee choice by submitting a written request to the Division no later than December 31 of the annual accounting period for which the fee is due.

(c) When paying annual Title V emission fees, the permittee shall comply with all provisions of 1200-03-26-.02 and 1200-03-09-.02(11) applicable to such fees.

(d) Where more than one (1) allowable emission limit is applicable to a regulated pollutant, the allowable emissions for the regulated pollutants shall not be double counted. Major sources subject to the provisions of paragraph 1200-03-26-.02(9) shall apportion their emissions as follows to ensure that their fees are not double counted.

1. Sources that are subject to federally promulgated hazardous air pollutant under 40 CFR 60, 61, or 63 will place such regulated emissions in the regulated hazardous air pollutant (HAP) category.

2. A category of miscellaneous HAPs shall be used for hazardous air pollutants listed at part 1200-03-26-.02(2)(i)12 that are not subject to federally promulgated hazardous air pollutant standards under 40 CFR 60, 61, or 63.

3. HAPs that are also in the family of volatile organic compounds, particulate matter, or PM₁₀ shall not be placed in either the regulated HAP category or miscellaneous HAP category.

4. Sources that are subject to a provision of chapter 1200-03-16 New Source Performance Standards (NSPS) or chapter 0400-30-39 Standards of Performance for New Stationary Sources for pollutants that are neither particulate matter, PM₁₀, sulfur dioxide (SO₂), volatile organic compounds (VOC), nitrogen oxides (NO_x), or hazardous air pollutants (HAPs) will place such regulated emissions in an NSPS pollutant category.

5. The regulated HAP category, the miscellaneous HAP category, and the NSPS pollutant category are each subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i).

6. Major sources that wish to pay annual emission fees for PM₁₀ on an allowable emission basis may do so if they have a specific PM₁₀ allowable emission standard. If a major source has a total particulate emission standard, but wishes to pay annual emission fees on an actual PM₁₀ emission basis, it may do so if the PM₁₀ actual emission levels are proven to the satisfaction of the Technical Secretary. The method to demonstrate the actual PM₁₀ emission levels must be made as part of the source's major source operating permit in advance in order to exercise this option. The PM₁₀ emissions reported under these options shall not be subject to fees under the family of particulate emissions. The 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i) shall also apply to PM₁₀ emissions.

TAPCR 1200-03-26-.02 and 1200-03-09-.02(11)(e)1(vii)

- A9. Permit revision not required.** A permit revision will not be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or process for changes that are provided for in the permit.

TAPCR 1200-03-09-.02(11)(e)1(viii)

- A10. Inspection and entry.** Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Technical Secretary or an authorized representative to perform the following for the purposes of determining compliance with the permit applicable requirements:

(a) Enter upon, at reasonable times, the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

(d) As authorized by the Clean Air Act and Chapter 1200-03-10 of TAPCR, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(e) "Reasonable times" shall be considered to be customary business hours unless reasonable cause exists to suspect noncompliance with the Act, Division 1200-03 or any permit issued pursuant thereto and the Technical Secretary specifically authorizes an inspector to inspect a facility at any other time.

TAPCR 1200-03-09-.02(11)(e)3.(ii)

A11. Permit shield.

(a) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date of permit issuance, provided that:

1. Such applicable requirements are included and are specifically identified in the permit; or
2. The Technical Secretary, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.

(b) Nothing in this permit shall alter or affect the following:

1. The provisions of section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section. Similarly, the provisions of T.C.A. §68-201-109 (emergency orders) including the authority of the Governor under the section;
2. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
3. The applicable requirements of the acid rain program, consistent with section 408(a) of the Federal Act; or
4. The ability of EPA to obtain information from a source pursuant to section 114 of the Federal Act.

(c) Permit shield is granted to the permittee.

TAPCR 1200-03-09-.02(11)(e)6

A12. Permit renewal and expiration.

(a) An application for permit renewal must be submitted at least 180 days, but no more than 270 days prior to the expiration of this permit. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted.

(b) If the permittee submits a timely and complete application for permit renewal the source will not be considered to be operating without a permit until the Technical Secretary takes final action on the permit application, except as otherwise noted in paragraph 1200-03-09-.02(11).

(c) This permit, its shield provided in Condition A11, and its conditions will be extended and effective after its expiration date provided that the source has submitted a timely, complete renewal application to the Technical Secretary.

TAPCR 1200-03-09-.02(11)(f)2 and 3, 1200-03-09-.02(11)(d)1(i)(III), and 1200-03-09-.02(11)(a)2

A13. Reopening for cause.

(a) A permit shall be reopened and revised prior to the expiration of the permit under any of the circumstances listed below:

1. Additional applicable requirements under the Federal Act become applicable to the sources contained in this permit provided the permit has a remaining term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the permit expiration date of this permit, unless the original has been extended pursuant to 1200-03-09-.02(11)(a)2.
2. Additional requirements become applicable to an affected source under the acid rain program.
3. The Technical Secretary or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
4. The Technical Secretary or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(b) Proceedings to reopen and issue a permit shall follow the same proceedings as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists, and not the entire permit. Such reopening shall be made as expeditiously as practicable.

(c) Reopenings for cause shall not be initiated before a notice of such intent is provided to the permittee by the Technical Secretary at least 30 days in advance of the date that the permit is to be reopened except that the Technical Secretary may provide a shorter time period in the case of an emergency. An emergency shall be established by the criteria of T.C.A. 68-201-109 or other compelling reasons that public welfare is being adversely affected by the operation of a source that is in compliance with its permit requirements.

(d) If the Administrator finds that cause exists to terminate, modify, or revoke and reissue a permit as identified in A13, he is required under federal rules to notify the Technical Secretary and the permittee of such findings in writing. Upon receipt of such notification, the Technical Secretary shall investigate the matter in order to determine if he agrees or disagrees with the Administrator's findings. If he agrees with the Administrator's findings, the Technical Secretary shall conduct the reopening in the following manner:

1. The Technical Secretary shall, within 90 days after receipt of such notification, forward to EPA a proposed determination of termination, modification, or revocation and reissuance, as appropriate. If the Administrator grants additional time to secure permit applications or additional information from the permittee, the Technical Secretary shall have the additional time period added to the standard 90 day time period.
2. EPA will evaluate the Technical Secretary's proposed revisions and respond as to their evaluation.
3. If EPA agrees with the proposed revisions, the Technical Secretary shall proceed with the reopening in the same manner prescribed under Condition A13 (b) and Condition A13 (c).
4. If the Technical Secretary disagrees with either the findings or the Administrator that a permit should be reopened or an objection of the Administrator to a proposed revision to a permit submitted pursuant to Condition A13(d), he shall bring the matter to the Board at its next regularly scheduled meeting for instructions as to how he should proceed. The permittee shall be required to file a written brief expressing their position relative to the Administrator's objection and have a responsible official present at the meeting to answer questions for the Board. If the Board agrees that EPA is wrong in their demand for a permit revision, they shall instruct the Technical Secretary to conform to EPA's demand, but to issue the permit under protest preserving all rights available for litigation against EPA.

TAPCR. 1200-03-09-.02(11)(f)6 and 7.

A14. Permit transference. An administrative permit amendment allows for a change of ownership or operational control of a source where the Technical Secretary determines that no other change in the permit is necessary, provided that the following requirements are met:

- (a) Transfer of ownership permit application is filed consistent with the provisions of 1200-03-09-.03(6), and
- (b) written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the Technical Secretary.

TAPCR 1200-03-09-.02(11)(f)4(i)(IV) and 1200-03-09-.03(6)

A15. Air pollution alert. When the Technical Secretary has declared that an air pollution alert, an air pollution warning, or an air pollution emergency exists, the permittee must follow the requirements for that episode level as outlined in TAPCR 1200-03-09-.03(1) and TAPCR 1200-03-15-.03.

A16. Construction permit required. Except as exempted in TAPCR 1200-03-09-.04, or excluded in subparagraph TAPCR 1200-03-02-.01(1)(aa) or subparagraph TAPCR 1200-03-02-.01(1)(cc), this facility shall not begin the construction of a new air contaminant source or the modification of an air contaminant source which may result in the discharge of air contaminants without first having applied for and received from the Technical Secretary a construction permit for the construction or modification of such air contaminant source.

TAPCR 1200-03-09-.01(1)(a)

A17. Notification of changes. The permittee shall notify the Technical Secretary 30 days prior to commencement of any of the following changes to an air contaminant source which would not be a modification requiring a construction permit.

- (a) change in air pollution control equipment
- (b) change in stack height or diameter
- (c) change in exit velocity of more than 25 percent or exit temperature of more than 15 percent based on absolute temperature.

TAPCR 1200-03-09-.02(7)

A18. Schedule of compliance. The permittee will comply with any applicable requirement that becomes effective during the permit term on a timely basis. If the permittee is not in compliance the permittee must submit a schedule for coming into compliance which must include a schedule of remedial measure(s), including an enforceable set of deadlines for specific actions.

TAPCR 1200-03-09-.02(11)(d)3 and 40 CFR Part 70.5(c)

A19. Title VI.

(a) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:

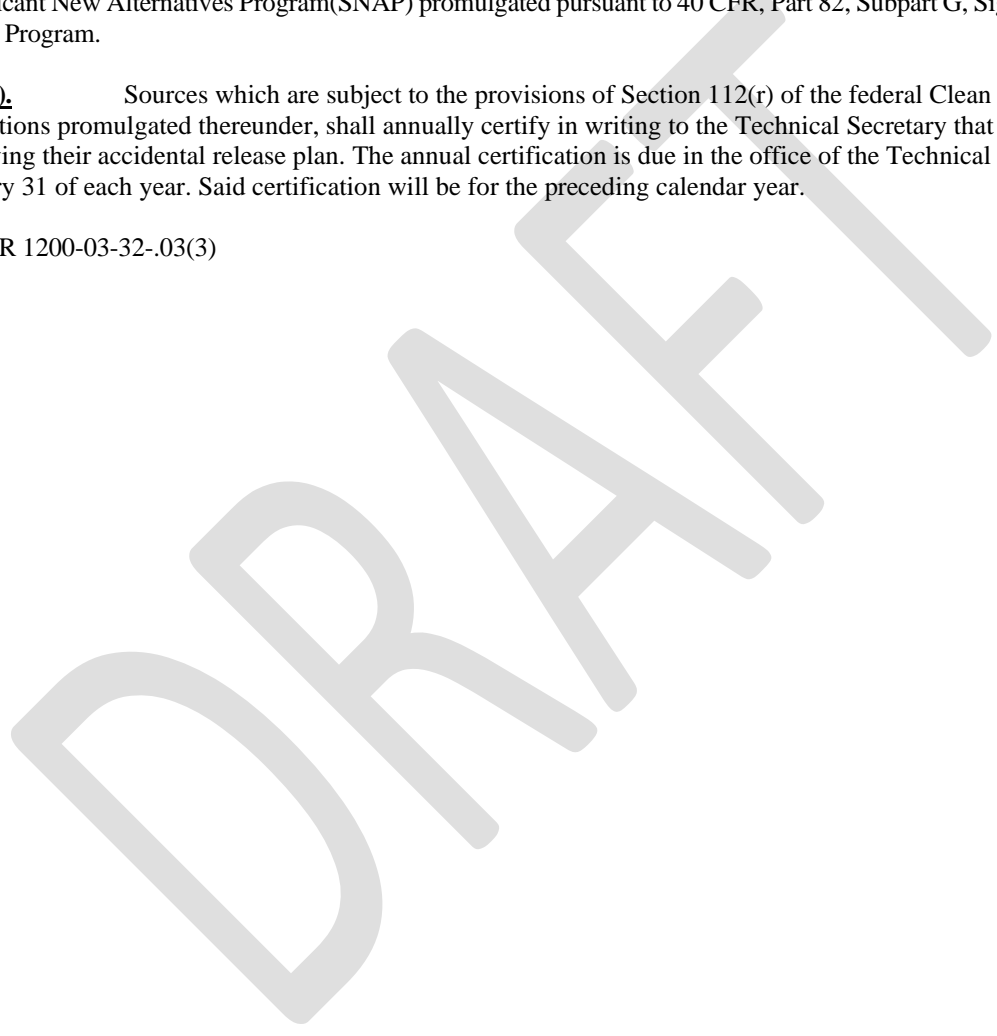
1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to Section 82.156.
2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to Section 82.158.
3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to Section 82.161.

(b) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone depleting substance refrigerant in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

(c) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR, Part 82, Subpart G, Significant New Alternatives Policy Program.

A20. 112 (r). Sources which are subject to the provisions of Section 112(r) of the federal Clean Air Act or any federal regulations promulgated thereunder, shall annually certify in writing to the Technical Secretary that they are properly following their accidental release plan. The annual certification is due in the office of the Technical Secretary no later than January 31 of each year. Said certification will be for the preceding calendar year.

TAPCR 1200-03-32-.03(3)



SECTION B

**GENERAL CONDITIONS for MONITORING,
REPORTING, and ENFORCEMENT**

B1. Recordkeeping. Monitoring and related record keeping shall be performed in accordance with the requirements specified in the permit conditions for each individual permit unit. In no case shall reports of any required monitoring and record keeping be submitted less frequently than every six months.

- (a) Where applicable, records of required monitoring information include the following:
1. The date, place as defined in the permit, and time of sampling or measurements;
 2. The date(s) analyses were performed;
 3. The company or entity that performed the analysis;
 4. The analytical techniques or methods used;
 5. The results of such analyses; and
 6. The operating conditions as existing at the time of sampling or measurement.

(b) Digital data accumulation which utilizes valid data compression techniques shall be acceptable for compliance determination as long as such compression does not violate an applicable requirement and its use has been approved in advance by the Technical Secretary.

TAPCR 1200-03-09-.02(11)(e)1(iii)

B2. Retention of monitoring data. The permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

TAPCR 1200-03-09-.02(11)(e)1(iii)(II)II

B3. Reporting. Reports of any required monitoring and record keeping shall be submitted to the Technical Secretary in accordance with the frequencies specified in the permit conditions for each individual permit unit. Reports shall be submitted within 60 days of the close of the reporting period unless otherwise noted. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. Reports required under "State only requirements" are not required to be certified by a responsible official.

TAPCR 1200-03-09-.02(11)(e)1(iii)

B4. Certification. Except for reports required under "State Only" requirements, any application form, report or compliance certification submitted pursuant to the requirements of this permit shall contain certification by a responsible official of truth, accuracy and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

TAPCR 1200-03-09-.02(11)(d)4

B5. Annual compliance certification. The permittee shall submit annually compliance certifications with terms and conditions contained in Sections A, B, D and E of this permit, including emission limitations, standards, or work practices. This compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

- (a) The identification of each term or condition of the permit that is the basis of the certification;
- (b) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period; such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;
- (c) The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in B5(b) above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion* or exceedance** as defined below occurred; and
- (d) Such other facts as the Technical Secretary may require to determine the compliance status of the source.

* "Excursion" shall mean a departure from an indicator range established for monitoring under this paragraph, consistent with any averaging period specified for averaging the results of the monitoring.

** "Exceedance" shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

40 CFR Part 70.6(c)(5)(iii) as amended in the Federal Register Vol. 79, No.144, July 28, 2014, pages 43661 through 43667

B6. Submission of compliance certification. The compliance certification shall be submitted to:

The Tennessee Department of Environment and Conservation Environmental Field Office specified in Section E of this permit	and	Air Enforcement Branch US EPA Region IV 61 Forsyth Street, SW Atlanta, Georgia 30303
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TAPCR 1200-03-09-.02(11)(e)3(v)(IV)

B7. Emergency provisions. An emergency constitutes an affirmative defense to an enforcement action brought against this source for noncompliance with a technology based emission limitation due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

(a) The affirmative defense of the emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

1. An emergency occurred and that the permittee can identify the probable cause(s) of the emergency. "Probable" must be supported by a credible investigation into the incident that seeks to identify the causes and results in an explanation supported by generally accepted engineering or scientific principles.

2. The permitted source was at the time being properly operated. In determining whether or not a source was being properly operated, the Technical Secretary shall examine the source's written standard operating procedures which were in effect at the time of the noncompliance and any other code as detailed below that would be relevant to preventing the noncompliance. Adherence to the source's standard operating procedures will be the test of adequate preventative maintenance, careless operation, improper operation or operator error to the extent that such adherence would prevent noncompliance. The source's failure to follow recognized standards of practice to the extent that adherence to such a standard would have prevented noncompliance will disqualify the source from any claim of an emergency and an affirmative defense.

3. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.

4. The permittee submitted notice of the emergency to the Technical Secretary according to the notification criteria for malfunctions in rule 1200-03-20-.03. For the purposes of this condition, "emergency" shall be substituted for "malfunction(s)" in rule 1200-03-20-.03 to determine the relevant notification threshold. The notice shall include a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding the permittee seeking to establish the occurrence of an emergency has the burden of proof.

(c) The provisions of this condition are in addition to any emergency, malfunction or upset requirement contained in Division 1200-03 or other applicable requirement.

TAPCR 1200-03-09-.02(11)(e)7

B8. Excess emissions reporting.

(a) The permittee shall promptly notify the Technical Secretary when any emission source, air pollution control equipment, or related facility breaks down in such a manner to cause the emission of air contaminants in excess of the applicable emission standards contained in Division 1200-03 or any permit issued thereto, or of sufficient duration to cause damage to property or public health. The permittee must provide the Technical Secretary with a statement giving all pertinent facts, including the estimated duration of the breakdown. Violations of the visible emission standard which occur for less than 20 minutes in one day (midnight to midnight) need not be reported. Prompt notification will be within 24 hours of the malfunction and shall be provided by telephone to the Division's Nashville office. The Technical Secretary shall be notified when the condition causing the failure or breakdown has been corrected. In attainment and unclassified areas if emissions other than from sources designated as significantly impacting on a nonattainment area in excess of the standards will not and do not occur over more than a 24-hour period (or will not recur over more than a 24-hour period) and no damage to property and or public health is anticipated, notification is not required.

(b) Any malfunction that creates an imminent hazard to health must be reported by telephone immediately to the Division's Nashville office at (615) 532-0554 and to the State Civil Defense.

(c) A log of all malfunctions, startups, and shutdowns resulting in emissions in excess of the standards in Division 1200-03 or any permit issued thereto must be kept at the plant. All information shall be entered in the log no later than twenty-four (24) hours after the startup or shutdown is complete, or the malfunction has ceased or has been corrected. Any later discovered corrections can be added in the log as footnotes with the reason given for the change. This log must record at least the following:

1. Stack or emission point involved
2. Time malfunction, startup, or shutdown began and/or when first noticed
3. Type of malfunction and/or reason for shutdown
4. Time startup or shutdown was complete or time the air contaminant source returned to normal operation
5. The company employee making entry on the log must sign, date, and indicate the time of each log entry

The information under items 1. and 2. must be entered into the log by the end of the shift during which the malfunction or startup began. For any source utilizing continuous emission(s) monitoring, continuous emission(s) monitoring collection satisfies the above log keeping requirement.

TAPCR 1200-03-20-.03 and .04

B9. Malfunctions, startups and shutdowns - reasonable measures required. The permittee must take all reasonable measures to keep emissions to a minimum during startups, shutdowns, and malfunctions. These measures may include installation and use of alternate control systems, changes in operating methods or procedures, cessation of operation until the process equipment and/or air pollution control equipment is repaired, maintaining sufficient spare parts, use of overtime labor, use of outside consultants and contractors, and other appropriate means. Failures that are caused by poor maintenance, careless operation or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions. This provision does not apply to standards found in 40 CFR, Parts 60(Standards of performance for new stationary sources), 61(National emission standards for hazardous air pollutants) and 63(National emission standards for hazardous air pollutants for source categories).

TAPCR 1200-03-20-.02

B10. Reserved.

B11. Report required upon the issuance of a notice of violation for excess emissions. The permittee must submit within twenty (20) days after receipt of the notice of violation, the data required below. If this data has previously been available to the Technical Secretary prior to the issuance of the notice of violation no further action is required of the violating source. However, if the source desires to submit additional information, then this must be submitted within the same twenty (20) day time period. The minimum data requirements are:

- (a) The identity of the stack and/or other emission point where the excess emission(s) occurred;
- (b) The magnitude of the excess emissions expressed in pounds per hour and the units of the applicable emission limitation and the operating data and calculations used in determining the magnitude of the excess emissions;
- (c) The time and duration of the emissions;
- (d) The nature and cause of such emissions;
- (e) For malfunctions, the steps taken to correct the situation and the action taken or planned to prevent the recurrence of such malfunctions;
- (f) The steps taken to limit the excess emissions during the occurrence reported, and
- (g) If applicable, documentation that the air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good operating practices for minimizing emissions.

Failure to submit the required report within the twenty (20) day period specified shall preclude the admissibility of the data for determination of potential enforcement action.

TAPCR 1200-03-20-.06(2), (3) and (4)

SECTION C

PERMIT CHANGES

- C1. Operational flexibility changes.** The source may make operational flexibility changes that are not addressed or prohibited by the permit without a permit revision subject to the following requirements:
- (a) The change cannot be subject to a requirement of Title IV of the Federal Act or Chapter 1200-03-30.
 - (b) The change cannot be a modification under any provision of Title I of the federal Act or Division 1200-03.
 - (c) Each change shall meet all applicable requirements and shall not violate any existing permit term or condition.
 - (d) The source must provide contemporaneous written notice to the Technical Secretary and EPA of each such change, except for changes that are below the threshold of levels that are specified in Rule 1200-03-09-.04.
 - (e) Each change shall be described in the notice including the date, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change.
 - (f) The change shall not qualify for a permit shield under the provisions of part 1200-03-09-.02(11)(e)6.
 - (g) The permittee shall keep a record describing the changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes. The records shall be retained until the changes are incorporated into subsequently issued permits.

TAPCR 1200-03-09-.02(11)(a)4 (ii)

- C2. Section 502(b)(10) changes.**
- (a) The permittee can make certain changes without requiring a permit revision, if the changes are not modifications under Title I of the Federal Act or Division 1200-03 and the changes do not exceed the emissions allowable under the permit. The permittee must, however, provide the Administrator and Technical Secretary with written notification within a minimum of 7 days in advance of the proposed changes. The Technical Secretary may waive the 7 day advance notice in instances where the source demonstrates in writing that an emergency necessitates the change. Emergency shall be demonstrated by the criteria of TAPCR 1200-03-09-.02(11)(e)7 and in no way shall it include changes solely to take advantages of an unforeseen business opportunity. The Technical Secretary and EPA shall attach each such notice to their copy of the relevant permit.
 - (b) The written notification must be signed by a facility Title V responsible official and include the following:
 - 1. a brief description of the change within the permitted facility;
 - 2. the date on which the change will occur;
 - 3. a declaration and quantification of any change in emissions;
 - 4. a declaration of any permit term or condition that is no longer applicable as a result of the change; and
 - 5. a declaration that the requested change is not a Title I modification and will not exceed allowable emissions under the permit.
 - (c) The permit shield provisions of TAPCR 1200-03-09-.02(11)(e)6 shall not apply to Section 502(b)(10) changes.

TAPCR 1200-03-09-.02(11)(a)4 (i)

- C3. Administrative amendment.**
- (a) Administrative permit amendments to this permit shall be in accordance with 1200-03-09-.02(11)(f)4. The source may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request.
 - (b) The permit shield shall be extended as part of an administrative permit amendment revision consistent with the provisions of TAPCR 1200-03-09-.02(11)(e)6 for such revisions made pursuant to item (c) of this condition which meet the relevant requirements of TAPCR 1200-03-09-.02(11)(e), TAPCR 1200-03-09-.02(11)(f) and TAPCR 1200-03-09-.02(11)(g) for significant permit modifications.
 - (c) Proceedings to review and grant administrative permit amendments shall be limited to only those parts of the permit for which cause to amend exists, and not the entire permit.

TAPCR 1200-03-09-.02(11)(f)4

- C4. Minor permit modifications.**
- (a) The permittee may submit an application for a minor permit modification in accordance with TAPCR 1200-03-09-.02(11)(f)5(ii).
 - (b) The permittee may make the change proposed in its minor permit modification immediately after an application is filed with the Technical Secretary.
 - (c) Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.

- (d) Minor permit modifications do not qualify for a permit shield.

TAPCR 1200-03-09-.02(11)(f)5(ii)

C5. Significant permit modifications.

(a) The permittee may submit an application for a significant modification in accordance with TAPCR 1200-03-09-.02(11)(f)5(iv).

(b) Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.

TAPCR 1200-03-09-.02(11)(f)5(iv)

C6. New construction or modifications.

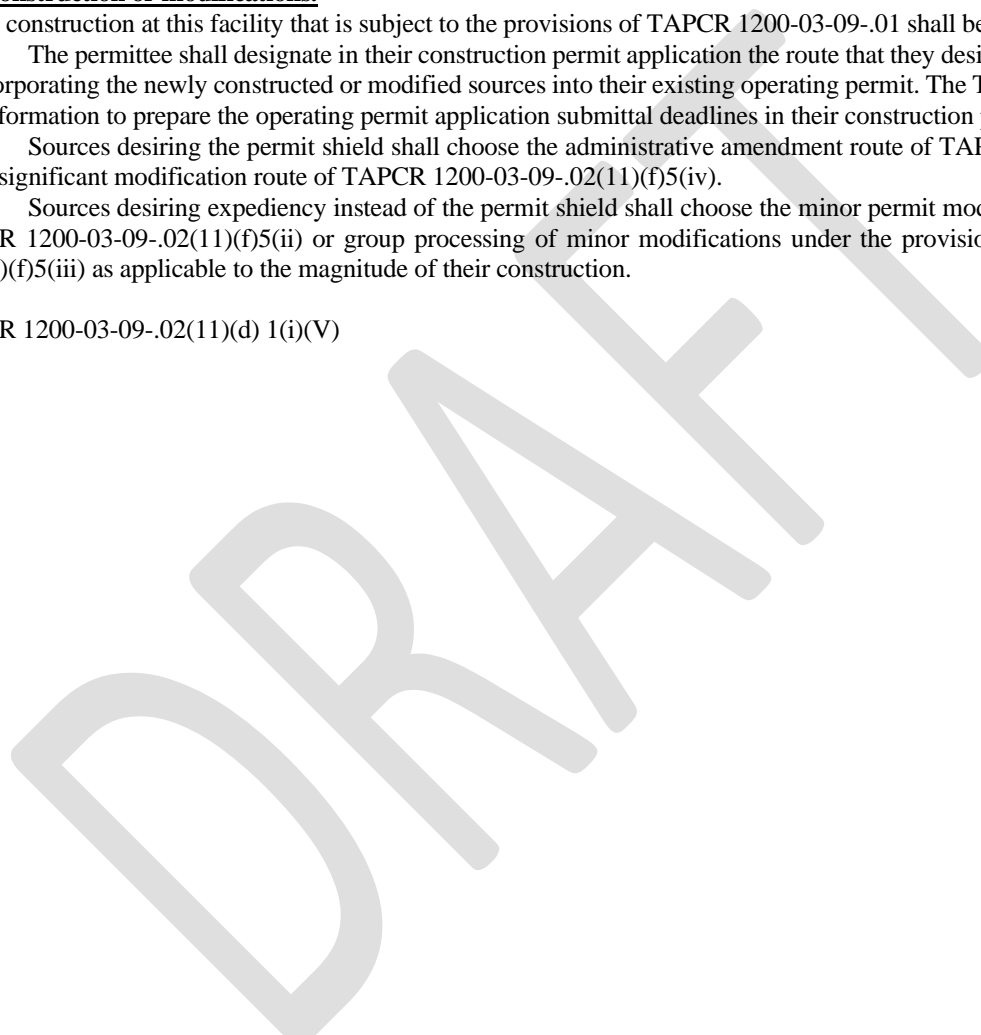
Future construction at this facility that is subject to the provisions of TAPCR 1200-03-09-.01 shall be governed by the following:

(a) The permittee shall designate in their construction permit application the route that they desire to follow for the purposes of incorporating the newly constructed or modified sources into their existing operating permit. The Technical Secretary shall use that information to prepare the operating permit application submittal deadlines in their construction permit.

(b) Sources desiring the permit shield shall choose the administrative amendment route of TAPCR 1200-03-09-.02(11)(f)4 or the significant modification route of TAPCR 1200-03-09-.02(11)(f)5(iv).

(c) Sources desiring expediency instead of the permit shield shall choose the minor permit modification procedure route of TAPCR 1200-03-09-.02(11)(f)5(ii) or group processing of minor modifications under the provisions of TAPCR 1200-03-09-.02(11)(f)5(iii) as applicable to the magnitude of their construction.

TAPCR 1200-03-09-.02(11)(d) 1(i)(V)



SECTION D

GENERAL APPLICABLE REQUIREMENTS

- D1. Visible emissions.** With the exception of air emission sources exempt from the requirements of TAPCR Chapter 1200-03-05 and air emission sources for which a different opacity standard is specifically provided elsewhere in this permit, the permittee shall not cause, suffer, allow or permit discharge of a visible emission from any air contaminant source with an opacity in excess of twenty percent for an aggregate of more than five minutes in any one hour or more than twenty minutes in any twenty-four hour period; provided, however, that for fuel burning installations with fuel burning equipment of input capacity greater than 600 million btu per hour, the permittee shall not cause, suffer, allow, or permit discharge of a visible emission from any fuel burning installation with an opacity in excess of twenty percent (6-minute average) except for one six minute period per one hour of not more than forty percent opacity. Sources constructed or modified after July 7, 1992 shall utilize 6-minute averaging.
- Consistent with the requirements of TAPCR Chapter 1200-03-20, due allowance may be made for visible emissions in excess of that permitted under TAPCR 1200-03-05 which are necessary or unavoidable due to routine startup and shutdown conditions. The facility shall maintain a continuous, current log of all excess visible emissions showing the time at which such conditions began and ended and that such record shall be available to the Technical Secretary or an authorized representative upon request.
- TAPCR 1200-03-05-.01(1), TAPCR 1200-03-05-.03(6) and TAPCR 1200-03-05-.02(1)
- D2. General provisions and applicability for non-process gaseous emissions.** Any person constructing or otherwise establishing a non-portable air contaminant source emitting gaseous air contaminants after April 3, 1972, or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize the best equipment and technology currently available for controlling such gaseous emissions.
- TAPCR 1200-03-06-.03(2)
- D3. Non-process emission standards.** The permittee shall not cause, suffer, allow, or permit particulate emissions from non-process sources in excess of the standards in TAPCR 1200-03-06.
- D4. General provisions and applicability for process gaseous emissions.** Any person constructing or otherwise establishing an air contaminant source emitting gaseous air contaminants after April 3, 1972, or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize equipment and technology which is deemed reasonable and proper by the Technical Secretary.
- TAPCR 1200-03-07-.07(2)
- D5. Particulate emissions from process emission sources.** The permittee shall not cause, suffer, allow, or permit particulate emissions from process sources in excess of the standards in TAPCR 1200-03-07.
- D6. Sulfur dioxide emission standards.** The permittee shall not cause, suffer, allow, or permit Sulfur dioxide emissions from process and non-process sources in excess of the standards in TAPCR 1200-03-14. Regardless of the specific emission standard, new process sources shall utilize the best available control technology as deemed appropriate by the Technical Secretary of the Tennessee Air Pollution Control Board.
- D7. Fugitive Dust.**
- (a) The permittee shall not cause, suffer, allow, or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions shall include, but not be limited to, the following:
1. Use, where possible, of water or chemicals for control of dust in demolition of existing buildings or structures, construction operations, grading of roads, or the clearing of land;
 2. Application of asphalt, water, or suitable chemicals on dirt roads, material stock piles, and other surfaces which can create airborne dusts;

3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting or other similar operations.

(b) The permittee shall not cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five (5) minutes per hour or twenty (20) minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates, excluding malfunction of equipment as provided in Chapter 1200-03-20.

TAPCR 1200-03-08

D8. Open burning. The permittee shall comply with the TAPCR 1200-03-04 for all open burning activities at the facility.

TAPCR 1200-03-04

D9. Asbestos. Where applicable, the permittee shall comply with the requirements of TAPCR 1200-03-11-.02(2)(d) when conducting any renovation or demolition activities at the facility.

TAPCR 1200-03-11-.02(2)(d) and 40 CFR, Part 61

D10. Annual certification of compliance. The generally applicable requirements set forth in Section D of this permit are intended to apply to activities and sources that are not subject to source-specific applicable requirements contained in State of Tennessee and U.S. EPA regulations. By annual certification of compliance, the permittee shall be considered to meet the monitoring and related record keeping and reporting requirements of TAPCR 1200-03-09-.02(11)(e)1.(iii) and 1200-03-10-.04(2)(b)1 and compliance requirements of TAPCR 1200-03-09-.02(11)(e)3.(i). The permittee shall submit compliance certification for these conditions annually.

D11. Emission Standards for Hazardous Air Pollutants. When applicable, the permittee shall comply with the TAPCR 0400-30-38 for all emission sources subject to a requirement contained therein.

TAPCR 0400-30-38

D12. Standards of Performance for New Stationary Sources. When applicable, the permittee shall comply with the TAPCR 0400-30-39 for all emission sources subject to a requirement contained therein.

TAPCR 0400-30-39

D13. Gasoline Dispensing Facilities. When applicable, the permittee shall comply with the TAPCR 1200-03-18-.24 for all emission sources subject to a requirement contained therein.

D14. Internal Combustion Engines.

- (a) All stationary reciprocating internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR 0400-30-38-.01.
- (b) All stationary compression ignition internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR 0400-30-39-.01.
- (c) All stationary spark ignition internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR 0400-30-39-.02.

TAPCR 0400-30-38 and 39

SECTION E

SOURCE SPECIFIC EMISSION STANDARDS, OPERATING LIMITATIONS, and MONITORING, RECORDKEEPING and REPORTING REQUIREMENTS

50-0054	<u>Facility Description:</u>	Graphic Packaging International Inc. is a facility producing customized packaging by printing and painting on polyethylene film and folding carton.
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Conditions E1 through E3 apply to all sources in Section E of this permit unless otherwise noted.

E1. Fee payment

FEE EMISSIONS SUMMARY TABLE FOR MAJOR SOURCE 50-0054

REGULATED POLLUTANTS	ALLOWABLE EMISSIONS (tons per AAP)	ACTUAL EMISSIONS (tons per AAP)	COMMENTS
PARTICULATE MATTER (PM)	104.4	AEAR	Includes all fee emissions.
PM ₁₀	N/A	N/A	
SO ₂	N/A	N/A	
VOC	786.18	AEAR	Includes all fee emissions.
NO _x	N/A	N/A	
CATEGORY OF MISCELLANEOUS HAZARDOUS AIR POLLUTANTS (HAP WITHOUT A STANDARD)*			
VOC FAMILY GROUP	N/A	AEAR	Fee emissions are included in VOC above.
NON-VOC GASEOUS GROUP	N/A	N/A	
PM FAMILY GROUP	N/A	N/A	
CATEGORY OF SPECIFIC HAZARDOUS AIR POLLUTANTS (HAP WITH A STANDARD)**			
VOC FAMILY GROUP	N/A	N/A	
NON-VOC GASEOUS GROUP	N/A	N/A	
PM FAMILY GROUP	1.0	AEAR	(40 CFR Part 63 Subpart N). Fee emissions are included in PM above.
CATEGORY OF NSPS POLLUTANTS NOT LISTED ABOVE***			
EACH NSPS POLLUTANT NOT LISTED ABOVE	N/A	N/A	

NOTES

AAP The **Annual Accounting Period (AAP)** is a 12 consecutive month period that **either (a) begins each July 1st and ends June 30th of the following year when fees are paid on a fiscal year basis, or (b) begins January 1st and ends December 31st of the same year when paying on a calendar year basis.** The **Annual Accounting Period** at the time of permit renewal issuance **began July 1, 2022 and ends June 30, 2023.** The next Annual Accounting Period begins **July 1, 2023 and ends June 30, 2024** unless a request to change the annual accounting period is submitted by the responsible official as required by subparagraph 1200-03-26-.02(9)(b) of the TAPCR and approved by the Technical Secretary. If the permittee wishes to revise their annual accounting period or their annual emission fee basis as allowed by subparagraph 1200-03-26-.02(9)(b) of the TAPCR, the responsible official must submit the request to the Division in writing on or before December 31 of the annual accounting period for which the fee is due. If a change in fee basis from allowable emissions to actual emissions for any pollutant is requested, the request from the responsible official must include the methods that will be used to determine actual emissions. Changes in fee bases must be made using the Title V Fee Selection form, form number APC 36 (CN-1583), included as an attachment 2 to this permit and available on the Division of Air Pollution Control's website.

N/A N/A indicates that no emissions are specified for fee computation.

AEAR If the permittee is paying annual emission fees on an actual emissions basis, **AEAR** indicates that an **Actual Emissions Analysis** is **Required** to determine the actual emissions of:

- (1) **each regulated pollutant** (Particulate matter, SO₂, VOC, NO_x and so forth. See TAPCR 1200-03-26-.02(2)(i) for the definition of a regulated pollutant.),
- (2) **each pollutant group** (VOC Family, Non-VOC Gaseous, and Particulate Family),
- (3) the **Miscellaneous HAP Category**,
- (4) the **Specific HAP Category**, and
- (5) the **NSPS Category**

under consideration during the **Annual Accounting Period**.

* **Category Of Miscellaneous HAP (HAP Without A Standard):** This category is made-up of hazardous air pollutants that do not have a federal or state standard. Each HAP is classified into one of three groups, the **VOC Family** group, the **Non-VOC Gaseous** group, or the **Particulate (PM) Family** group. **For fee computation**, the **Miscellaneous HAP Category** is subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i) of the TAPCR.

** **Category Of Specific HAP (HAP With A Standard):** This category is made-up of hazardous air pollutants (HAP) that are subject to Federally promulgated Hazardous Air Pollutant Standards that can be imposed under Chapter 1200-03-11 or Chapter 1200-03-31. Each individual hazardous air pollutant is classified into one of three groups, the **VOC Family** group, the **Non-VOC Gaseous** group, or the **Particulate (PM) Family** group. **For fee computation**, each individual hazardous air pollutant of the **Specific HAP Category** is subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i) of the TAPCR.

*** **Category Of NSPS Pollutants Not Listed Above:** This category is made-up of each New Source Performance Standard (NSPS) pollutant whose emissions are not included in the **PM, SO₂, VOC** or **NO_x** emissions from each source in this permit. **For fee computation**, each **NSPS pollutant not listed above** is subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i) of the TAPCR.

END NOTES

- The permittee shall:**
- (1) Pay Title V **annual emission fees**, on the emissions and year bases requested by the responsible official and approved by the Technical Secretary, for each annual accounting period (AAP) by the payment deadline(s) established in TAPCR 1200-03-26-.02(9)(g). Fees may be paid on an **actual, allowable, or mixed** emissions basis; and on either a **state fiscal year** or a **calendar year**, provided the requirements of TAPCR 1200-03-26-.02(9)(b) are met. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within 15 days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8).
 - (2) Sources paying annual emissions fees on an allowable emissions basis: pay annual allowable based emission fees for each annual accounting period no later than April 1 of each year pursuant to TAPCR 1200-03-26-.02(9)(d).
 - (3) Sources paying annual emissions fees on an actual emissions basis: prepare an **actual emissions analysis** for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:
 - (a) the completed **Fee Emissions Summary Table**,
 - (b) each **actual emissions analysis** required, and
 - (c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary's representative. The summary must include sufficient information for the Technical Secretary to determine the accuracy of the calculations. These calculations must be based on the annual fee basis approved by the Technical Secretary (a state fiscal year [July 1 through June 30] or a calendar year [January 1 through December 31]). These records shall be used to complete the **actual emissions analyses** required by the above **Fee Emissions Summary Table**.
 - (4) Sources paying annual emissions fees on a mixed emissions basis: for all pollutants and all sources for which the permittee has chosen an actual emissions basis, prepare an

actual emissions analysis for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:

- (a) the completed **Fee Emissions Summary Table**,
- (b) each **actual emissions analysis** required, and
- (c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary’s representative. The summary must include sufficient information for the Technical Secretary to determine the accuracy of the calculations. These calculations must be based on the fee bases approved by the Technical Secretary (payment on an actual or mixed emissions basis) and payment on a state fiscal year (July 1 through June 30) or a calendar year (January 1 through December 31). These records shall be used to complete the **actual emissions analysis**.

For all pollutants and all sources for which the permittee has chosen an allowable emissions basis, pay allowable based emission fees pursuant to TAPCR 1200-03-26-.02(9)(d).

- (5) When paying on an actual or mixed emissions basis, submit the **actual emissions analyses** at the time the fees are paid in full.

The annual emission fee due dates are specified in TAPCR 1200-03-26-.02(9)(g) and are dependent on the Responsible Official’s choice of fee bases as described above. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within 15 days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8). Emissions for regulated pollutants shall not be double counted as specified in **Condition A8(d)** of this permit.

Payment of the fee due and the actual emissions analysis (if required) shall be submitted to The Technical Secretary at the following address:

Payment of Fee to:

The Tennessee Department of Environment and Conservation
 Division of Fiscal Services
 Consolidated Fee Section – APC
 William R. Snodgrass Tennessee Tower
 312 Rosa L. Parks Avenue, 10th Floor
 Nashville, Tennessee 37243

Actual Emissions Analyses to:

The Tennessee Department of Environment and Conservation
 Division of Air Pollution Control
 Emission Inventory Program
 William R. Snodgrass Tennessee Tower
 312 Rosa L. Parks Avenue, 15th Floor
 Nashville, Tennessee 37243

or

An electronic copy (PDF) of actual emissions analysis can also be submitted to: apc.inventory@tn.gov

E2. Reporting requirements.

- (a) **Semiannual reports.** Semiannual reports shall cover the six-month periods from **October 1 to March 31** and **April 1 to September 30** and shall be submitted within 60 days after the end of each six-month period. Subsequent reports shall be submitted within 60 days after the end of each 6-month period following the first report. The first semiannual report following issuance of this permit shall cover the following permits and reporting periods:

Permit Number	Reporting Period Begins	Reporting Period Ends
570561	April 1, 2022	day before new permit issuance (with year)
579087	Issuance Date of new permit (with year)	September 30, 2022

These semiannual reports shall include:

- (1) Any monitoring and recordkeeping required by **Conditions E3-4, E4-2, E5-1, E5-2, E6-1, E6-2, E6-3, E7-1, E7-2, E8-1, E8-2, E8-3, E9-1, E9-2, E12-1, E12-2, E12-3, E13-2, E14-1, and E14-3** of this permit. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.

- (2) The visible emission evaluation readings from **Condition E3-5** of this permit if required. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
- (3) Identification of all instances of deviations from **ALL PERMIT REQUIREMENTS**.

These reports must be certified by a responsible official consistent with condition B4 of this permit and shall be submitted to The Technical Secretary at the address in Condition E2(b) of this permit.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

(b) Annual compliance certification. The permittee shall submit annually compliance certifications with each term or condition contained in Sections A, B, D and E of this permit, including emission limitations, standards, or work practices. This compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

- (1) The identification of each term or condition of the permit that is the basis of the certification;
- (2) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period; Such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;
- (3) The status of compliance with each term or condition of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in E2(b)2 above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion* or exceedance** as defined below occurred; and
- (4) Such other facts as the Technical Secretary may require to determine the compliance status of the source.

* "Excursion" shall mean a departure from an indicator range established for monitoring under this paragraph, consistent with any averaging period specified for averaging the results of the monitoring.

** "Exceedance" shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

Annual compliance certifications shall cover the 12-month period from **October 1** to **September 30** and shall be submitted within 60 days after the end of each 12-month period. The first annual compliance certification following issuance of this permit shall cover the following permits and reporting periods:

Permit Number	Reporting Period Begins	Reporting Period Ends
570561	October 1, 2021	day before new permit issuance (with year)
579087	Issuance Date of new permit (with year)	September 30, 2022

These certifications shall be submitted to:

TN APCD and **EPA**

The Technical Secretary
 Division of Air Pollution Control
ATTN: Columbia Field Office
1421 Hampshire Pike
Columbia, Tennessee 38401-5611
 or
APC.ColuEFO@tn.gov

and Air Enforcement Branch
 US EPA Region IV
 61 Forsyth Street, SW
 Atlanta, Georgia 30303

TAPCR 1200-03-09-.02(11)(e)3.(v)

- (c) **Retention of Records** All records required by any condition in Section E of this permit must be retained for a period of not less than five years. Additionally, these records shall be kept available for inspection by the Technical Secretary or a Division representative.

TAPCR 1200-03-09-.02(11)(e)1.(iii)(II)II

E3. General Permit Requirements.

E3-1. Insignificant activities.

Insignificant activities as stated by the facility in the Title V Application per Rule 1200-03-09-.04(5) are listed below. Additional insignificant activities may be added and operated at any time with the provision that a written notification shall be submitted to the Technical Secretary including an updated APC V.2 Application Form along with a Truth, Accuracy, and Completeness Statement signed by a responsible official. The permit may be updated to include additional insignificant sources by means of an Administrative Amendment, if necessary.

Activity - Insignificant Rule [1200-03-09-.04(5)(a)4(i)]	Activity - Insignificant Rule [1200-03-09-.04(5)(a)4(i)]
Two 6000 gallon solvent storage tanks	Printer Trolley pump washer
Reclaimed press solvent storage tank (distillation room)	Laminator #3 LP board treater LP gas usage
Used press solvent storage tank, located in Ink Room	Carbon flame sealing using LP gas
Two 6000 gallon nitro cellulose storage tanks	Gluers (source 08)
Paperboard Roll Splitter/Cutter	

E3-2. Purchase order and invoice record requirements.

Purchase orders and invoices or a record of purchase orders and invoices for all VOC and HAP containing materials must be maintained and kept available for inspection by the Technical Secretary or a Division representative. This record must be retained for not less than five years.

E3-3. Facility HAP emission limitation.

Emissions of any hazardous air pollutant (HAP) listed in Section 112 of the Federal Clean Air Act shall not exceed 9.9 tons during all intervals of 12 consecutive months. Emissions of any combination of HAPs shall not exceed 24.9 tons during all intervals of 12 consecutive months. In the event that these limits are exceeded, this facility shall comply with all requirements of 40 CFR Part 63 Subpart KK- National Emission Standards for the Printing and Publishing Industry.

Compliance Method: The permittee shall demonstrate compliance with these limits by complying with **Condition E3-4**. Potential emissions of HAP from insignificant emission units have been calculated to be 0.9 tons per year. This value shall be added to the calculated 12-consecutive month total HAP emissions each month.

E3-4. VOC/HAP Recordkeeping requirements.

The VOC/HAP emissions from sources 50-0054-03, 50-0054-04, 50-0054-08, 50-0054-09, 50-0054-13, 50-0054-14, 50-0054-15 and 50-0054-17 shall be calculated from the information in the tables given below. Insert specific source number in space provided.

MONTHLY VOC EMISSIONS LOG FOR FACILITY 50-0054- : Part B MONTH/YEAR:

MATERIAL NAME	USAGE (pounds per month)	VOC CONTENT (wt%)	SOLVENT VOC INPUT (pounds per month)	VOC Emission Factor*	VOC Emitted (pounds per month)	Actual process time (hrs/month)	VOC Emissions (pounds per hour, monthly average)
MATERIAL ₁							
MATERIAL ₂							
MATERIAL _i							
TOTAL							

* VOC emission factor indicates the percentage of solvent VOC input that is emitted. See permit conditions for the specific source emission factor value.

MONTHLY HAP EMISSIONS LOG FOR FACILITY 50-0054- : Part C MONTH/YEAR:

MATERIAL NAME	USAGE (pounds per month)	HAP CONTENT (pounds HAP ₁ per pound or material)	VHAP EMISSIONS (tons VHAP ₁ per month)	HAP _p CONTENT (pounds HAP _p per pound of material)	VHAP _p EMISSIONS (tons VHAP _p per month)	HAP Emission factor (Control efficiency)	TOTAL HAP EMISSION (tons HAP ₁ through HAP _p per month)
MATERIAL ₁							
MATERIAL ₂							
MATERIAL ₃							
MATERIAL _i							
TOTAL							

YEARLY VOC/HAP EMISSIONS LOG FOR FACILITY 50-0054- : YEAR:

MONTH/YEAR (Fee Accounting Period is July 1, year to June 30, year)	VOC EMISSIONS (tons VOC per month)	(*)VOC EMISSIONS (tons VOC per 12 months)	TOTAL HAP EMISSIONS (tons HAP ₁ through HAP _p per month)	(*)TOTAL HAP EMISSIONS (tons HAP ₁ through HAP _p per 12 months)
July/year				
Aug/year etc.				
June/year				

(*) The tons per 12 month value is the sum of the VOC (or HAP) emissions in the 11 months preceding the month just completed plus the VOC (or HAP) emissions in the month just completed. If data is not available for the 11 months preceding the initial use of this log, this value will be equal to the value for tons per month. For the second month it will be the sum of the first month and the second month. Indicate in parentheses the number of months summed, for example 6 (2) represents 6 tons emitted in 2 months.

EQUATIONS FOR THE EMISSIONS LOG CALCULATIONS FOR FACILITY 50-0054:

MATERIAL_i HAP_p Emissions (tons HAP_p per month = Material_i Usage (lb/month) x Material_i HAP_p Content (wt%)/2000 lb/ton
 Where i = 1, 2, 3, ... n = the number of different materials;
 P = 1, 2, 3, ... n = the number of different hazardous air pollutants;
 lb = pounds

Note: use additional columns as required for the number of different hazardous air pollutants.

E3-5. Visible emissions.

Unless specified otherwise, visible emissions from this facility shall not exhibit greater than 20% opacity, except for one six-minute period in any one hour period, and for no more than four six-minute periods in any twenty-four hour period. Visible emissions from this facility shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average). Visible emissions from sources 03, 04, and 08 shall be determined by Tennessee Visible Emission Evaluation Method 2 as adopted by the Tennessee Air Pollution Control Board on August, 24, 1984.

TAPCR 1200-03-05-.03(6) and TAPCR 1200-03-05-.01(1)

Compliance Method: The permittee shall assure compliance with the opacity standards by utilizing the opacity matrix enclosed as Attachment 1. Reports and certifications shall be submitted in accordance with **Condition E2** of this permit.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

E3-6. Identification of Responsible Official, Technical Contact, and Billing Contact

- (a) The application that was utilized in the preparation of this permit is dated May 27, 2021 and signed by Eddie Lee, Plant Manager of the permitted facility. If this person terminates employment or is assigned different duties and is no longer a Responsible Official for this facility as defined in part 1200-03-09-.02(11)(b)21 of the Tennessee Air Pollution Control Regulations, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within thirty days of the change. The notification shall include the name and title of the new Responsible Official and certification of truth and accuracy. All representations, agreement to terms and conditions, and covenants made by the former Responsible Official that were used in the establishment of the permit terms and conditions will continue to be binding on the facility until such time that a revision to this permit is obtained that would change said representations, agreements, and/or covenants.
- (b) The application that was utilized in the preparation of this permit is dated May 27, 2021 and identifies Jay Neidert, Environmental, Health, & Safety Manager as the Principal Technical Contact for the permitted facility. If this person terminates employment or is assigned different duties and is no longer the Principal Technical Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within thirty days of the change. The notification shall include the name and title of the new Principal Technical Contact and certification of truth and accuracy.
- (c) The application that was utilized in the preparation of this permit is dated May 27, 2021 and identifies Jay Neidert, Environmental, Health, & Safety Manager as the Billing Contact for the permitted facility. If this person terminates employment or is assigned different duties and is no longer the Billing Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within thirty days of the change. The notification shall include the name and title of the new Billing Contact and certification of truth and accuracy.

E3-7. Record keeping requirements for this facility, including all data and calculations, must be updated and maintained based on the following schedule:

<u>Record Keeping Type</u>	<u>Update Requirement</u>
Monthly Log	Recorded within 30 days after the end of the month
Weekly Log	Recorded within 7 days after the end of the week
Daily Log	Recorded within 7 days after the end of the day

TAPCR 1200-03-10-.02(2)(a)

Compliance Method: Maintain the recordkeeping schedule as required.

50-0054-02**Paperboard Laminators:**

This source consists of 2 paperboard laminators with 5 polythene film extruders. Trim scrap from laminator, along with scrap from the Slitter/Re-winder, is collected by Cyclone C5 in order to keep this low-value scrap separate from other recyclable paperboard scrap material.

Conditions E4-1 through E4-2 apply to source 50-0054-02

E4-1. Material Input.

The stated material input rate for this source is 100,000 pounds per hour.

TAPCR 1200-03-09-.01(4)

Compliance Method: This is a statement of the design input capacity for this source. If the permittee wishes to increase the design input or maximum capacity of this source, the permittee shall pursue the appropriate Title V procedure in accordance with TAPCR 1200-03-09-.02(11). If a construction permit is applied for, this shall be done in accordance with TAPCR 1200-03-09-.01(1).

E4-2. Particulate matter (PM) limitation.

PM emitted from this source shall not exceed 14.4 pounds per hour (63.1 tons/year (TPY)).

TAPCR 1200-03-07-.01(5).

Compliance Method: Compliance with the hourly emission limitation rate shall be assured through periodic monitoring and use of pollution control equipment. This process shall not operate without the use of cyclone control. Each cyclone shall be externally inspected weekly to ensure that abrasion holes and plugging problems have not developed. Any abrasion holes shall be promptly repaired. Plugging problems are to be monitored by photo eye sensors in addition to external weekly inspection. Any ductwork with plugging problems shall be remedied promptly. An inspection log including the date of the inspection and the evaluation of the cyclone control equipment shall be maintained on site. The log shall note any weeks when the operation was not running and inspections were not required. For the semiannual report, the facility only needs to report whether or not the weekly inspections were conducted in compliance with this condition and **Condition E-2**.

50-0054-03**Ink System:**

This source is the room used for mixing and customizing inks. It is subject to PSD and LAER requirements.

Conditions E5-1 and E5-2 apply to source 50-0054-03

E5-1. Material Input Restriction.

Material input to this source shall not exceed 34,272 pounds per day of organic solvent on a monthly average basis.

TAPCR 1200-03-09-.01(4), construction permit #996650P issued pursuant to a November 28, 1988 PSD

Compliance Method: Compliance with this restriction shall be demonstrated through monthly recordkeeping of material usage rates as prescribed in **Condition E3-4** of this permit. Reports and certifications shall be submitted in accordance with **Condition E2** of this permit.

E5-2. Volatile Organic Compounds (VOC) limitation.

VOC emitted from this source shall not exceed 4.5 pounds per hour on a monthly average basis (19.7 TPY).

TAPCR 1200-03-09-.01(4), construction permit #996650P issued pursuant to a November 28, 1988 PSD

Compliance Method: Compliance with this emission limitation shall be demonstrated through recordkeeping and calculation of emissions on a monthly basis. Volatile organic compounds and HAP emissions from this source shall be calculated and maintained by keeping the logs as prescribed in **Condition E3-4** of this permit. A VOC emission factor value of 0.206% shall be used. This factor was established from engineering calculations provided in letters dated 1/28/98 and 2/6/98 from the permittee. Reports and certifications shall be submitted in accordance with **Condition E2** of this permit.

50-0054-04**Rotogravure Presses:**

This source is made up of 2 rotogravure presses with catalytic oxidization control. It is subject to PSD and LAER requirements.

Conditions E6-1 through E6-4 apply to source 50-0054-04

E6-1. Material Input Restriction.

The material input for this source shall not exceed 31,200 pounds per day of ink solvents, on a monthly average basis.

TAPCR 1200-03-09-.01(4), construction permit #931527P issued pursuant to an April 17, 1991 PSD

Compliance Method: Compliance with this restriction shall be demonstrated through monthly recordkeeping of material usage rates as prescribed in **Condition E3-4** of this permit. Reports and certifications shall be submitted in accordance with **Condition E2** of this permit.

E6-2. Volatile Organic Compounds (VOC) limitation.

VOC emitted from this source shall not exceed 120 pounds per hour, on a monthly average basis (525.6 TPY).

TAPCR 1200-03-09-.01(4), construction permit #931527P issued pursuant to an April 17, 1991 PSD

Compliance Method: Compliance with this emission limitation shall be demonstrated through recordkeeping and calculation of emissions on a monthly basis. Volatile organic compounds and HAP emissions from this source shall be calculated and maintained by keeping the logs as prescribed in **Condition E3-4** of this permit. A VOC emission factor based on the lower of the two destruction efficiencies of the Unit M and Unit W catalytic oxidizers shall be used. This emission factor shall be 100% minus the lower of the two destruction efficiencies of the Unit M and Unit W catalytic oxidizers, expressed as a percent. The destruction efficiency values used for the Unit M and Unit W catalytic oxidizers shall be those from the most recent determination of destruction efficiency of the catalytic oxidizers. A VOC emission factor of 2.6% shall be used, based on the test performed on the catalytic oxidizers on May 30, 2001. Reports and certifications shall be submitted in accordance with **Condition E2** of this permit.

E6-3. Control Efficiency Requirements.

The overall VOC reduction efficiency (including capture efficiency and destruction efficiency) for the rotogravure presses shall be at least 90%.

TAPCR 1200-03-09-.01(4), construction permit #931527P issued pursuant to an April 17, 1991 PSD

Compliance Method: The inlet temperature to the catalytic beds shall be used as method of demonstrating compliance with this requirement. Therefore, the inlet temperature to the catalytic beds of Unit M and Unit W shall be monitored and recorded continuously. The inlet temperature to the catalytic beds shall be no more than 50°F below the inlet temperature measured during the most recent determination of destruction efficiency of the catalytic oxidizers that demonstrated that the capture devices and the catalytic oxidizers met the VOC reduction efficiency above. A 97.6% destruction efficiency is assured for Unit M and 97.4% destruction efficiency is assured for Unit W, both based on an inlet temperature no more than 50°F below 550°F. This is based on the test performed on the catalytic oxidizers on May 30, 2001, considered acceptable by the Division of Air Pollution Control in a letter dated January 8, 2002.

The pressroom in which these presses are installed shall meet the following criteria to meet the requirements for a total enclosure for 100% VOC capture efficiency.

- (a) All access doors and windows whose areas are not included in item (e) and are not included in the calculation in item (c) below, shall be closed during routine operation of the process. Those doors or windows open during the verification of those sections may remain open at all times;
- (b) All VOC emissions must be captured and contained for discharge through a control device;
- (c) The average facial velocity (FV) air flow through all natural draft openings (NDOs) shall be at least 200 feet per minute (fpm) with a verification of continuous flow into the enclosure. A differential pressure

across the enclosure of -0.007 inches of water is required to demonstrate compliance with this requirement;

- (d) Any NDO shall be at least four equivalent opening diameters away from each VOC emitting point unless otherwise specified by the Administrator; and
- (e) The total area of all NDOs shall not exceed 5% of the surface area of the enclosure’s four walls, floor, and ceiling.

40 CFR 52.741, Procedure T for total enclosure

EPA Method 204 – Criteria for and Verification of a Permanent or Temporary Total Enclosure, in Appendix M to 40 CFR Part 51

Recordkeeping and reporting associated with this condition shall include the following:

(a) Monthly (i.e., one for each calendar month) logs showing all 3-hour periods of operation in which the average inlet temperature to a catalytic oxidizer was more than 50°F below the inlet temperature measured during the most recent determination of destruction efficiency of the catalytic oxidizers that demonstrated that the capture devices and the catalytic oxidizers met the VOC reduction efficiency above, if the destruction efficiency test results are considered acceptable in a letter issued by the Division of Air Pollution Control. These monthly logs shall be included in the semiannual reports required by **Condition E2(a)** of this permit.

All 3-hour periods are defined as each 3-hour period of time beginning at midnight each day (i.e., 12:00 midnight to 3:00 AM, 3:00 AM to 6:00 AM, etc.).

(b) The permittee shall notify the Technical Secretary of any 3-hour period(s) of operation in which the average inlet temperature to a catalytic oxidizer was more than 50°F below 550°F, within 30 calendar days following the occurrence. Such notice shall be submitted to the Technical Secretary at the address in **Condition E2(b)** of this permit. A copy of such notice shall be included in the semiannual reports required by **Condition E2(a)** of this permit.

(c) Reports and certifications shall be submitted in accordance with **Condition E2** of this permit.

Note: The inlet temperature measured during the most recent determination of destruction efficiency of the catalytic oxidizers that demonstrated that the capture devices and the catalytic oxidizers met the VOC reduction efficiency above is 550°F. This is based on destruction efficiency tests performed on the catalytic oxidizers on May 30, 2001, and considered acceptable by the Division of Air Pollution Control in a letter dated January 8, 2002.

E6-4. Based on the CAM applicability calculations, this source (50-0054-04) is subject to 40 CFR Part 64. Compliance Assurance Monitoring (CAM) for Volatile Organic Compounds.

Emission Units Subject to CAM Requirements.

Emission Point Number	Emission Unit	Control Equipment	Applicable Pollutant	CAM Classification (Large/Small)
04	Rotogravure Presses	Catalytic Oxidizers	VOC	Large

As indicated in above table, one control equipment technology is identified for inclusion in the CAM plan:

incineration. The following section/table summarizes the CAM requirements.

Rotogravure Printing Operation (04) Manufacturer Catalytic Oxidizer Monitoring Approach

I. Indicators	Indicator No. 1 Pre-catalyst chamber temperature
Measurement Approach	The temperature of the catalyst bed is monitored with a thermocouple.
II. Indicator Range	An excursion is defined any 3-hour period of operation in which the average inlet temperature is less than 500°F. This value is based on the test performed on May 30, 2001 and the provisions of TAPCR 1200-03-18-.03(5)(b)10.(ii). Excursions trigger a shut-down of equipment, corrective action, and a reporting requirement.
III. Performance Criteria	The sensor is located in the incinerator chamber as an integral part of the incinerator design. The accuracy of the thermocouple is $\pm 1\%$ of the temperature being monitored in degrees Celsius or $\pm 1^\circ$ Celsius whichever is greater. The chart recorder range is -200.0 to 1370.0 °C.
A. Data Representativeness	
B. Verification of Operational Status	Press controls are electrically interlocked with the inlet temperature reading of the oxidizers. If the inlet temperature drops below 500 degrees F, the presses automatically shut-down.
C. QA/QC Practices and Criteria	Accuracy of the thermocouple will be verified by a second or redundant thermocouple probe inserted into the incinerator chamber with a hand held meter. This validation check will be conducted at least annually. The acceptance criterion is $\pm 12^\circ$ F. The chart recorder is calibrated annually (as recommended by the device manufacturer).
D. Monitoring Frequency	Measured continuously (each 5 min.)
Data Collection Procedure	Recorded continuously on an electronic recorder.
Averaging Period	3 hour block average.

TAPCR 1200-03-09-.03(8)

50-0054-06	Paperboard Cutters:	This source is made up of five paperboard cutters with 3 cyclones for PM control. An adhesive laminator is installed to carton cutter #8.
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Conditions E7-1 through E7-2 apply to source 50-0054-06

E7-1. Material input restrictions.

The maximum material input rate of this source shall not exceed 120,000 pounds per hour of paperboard on a monthly average basis.

1200-03-09-.03(8)

Compliance method: Compliance with this restriction shall be demonstrated by recordkeeping. Paperboard material usage will be entered and recorded in the facility's accounting software program at the completion of each product order. The total paperboard input per month will be divided by the number of operating hours in the month for this source to obtain pounds per hour of input. Reports and certifications shall be submitted in accordance with **Condition E2** of this permit.

E7-2. Particulate Matter (PM) emission limitation.

The maximum PM emitted from this source shall not exceed 8.0 pounds per hour (35.1 TPY).

TAPCR 1200-03-07-.01(5)

Compliance Method: Compliance with the hourly emission limitation rate shall be assured through periodic monitoring and use of pollution control equipment. This process shall not operate without the use of cyclone control. Each cyclone shall be externally inspected weekly to assure that abrasion holes and plugging problems have not developed. Any abrasion holes shall be promptly repaired. Plugging problems are to be monitored by photo eye sensors in addition to external weekly inspection. Any ductwork with plugging problems shall be remedied promptly. An inspection log including the date of the inspection and the evaluation of the cyclone control equipment shall be maintained on site. The log shall note any weeks when the operation was not running and inspections were not required. For the semiannual report, the facility only needs to report whether or not the weekly inspections were conducted in compliance with this condition and **Condition E-2**.

50-0054-08	Folder Gluers:	This source is made up of 10 folder gluers at the time of application.
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Conditions E8-1 through E8-3 apply to source 50-0054-08

E8-1. Material input restrictions.

The maximum material input rate of this source shall not exceed 179,550 pounds per hour of paperboard on a monthly average basis.

1200-03-09-.03(8)

Compliance method: Compliance with this restriction shall be demonstrated by recordkeeping. Paperboard material usage will be entered and recorded in the facility's accounting software program at the completion of each product order. The total paperboard input per month will be divided by the number of operating hours in the month for this source to obtain pounds per hour of input. Reports and certifications shall be submitted in accordance with **Condition E2** of this permit.

E8-2. Particulate Matter (PM) emission limitation.

The maximum PM emitted from this source shall not exceed 1.4 pounds per hour (6.2 TPY).

TAPCR 1200-03-07-.01(5)

Compliance Method: Compliance with the hourly emission limitation rate shall be demonstrated through recordkeeping as described in **Condition E8-1**. Reports and certifications shall be submitted in accordance with **Condition E-2** of this permit.

E8-3. Volatile Organic Compounds (VOC) emission limitation.

The maximum VOC emitted from this source shall not exceed 0.2 pounds per hour, on a monthly average basis (0.88 TPY).

TAPCR 1200-03-09-.01(4)

Compliance Method: Compliance with this emission limitation shall be demonstrated through recordkeeping and calculation of emissions on a monthly basis. Volatile organic compounds and HAP emissions from this source shall be calculated and maintained by keeping the logs as prescribed in **Condition E3-4** of this permit. An emission factor value of 100% shall be used. Reports and certifications shall be submitted in accordance with **Condition E2** of this permit.

50-0054-09	Metallizer:	This source is composed of 2 metallizers. It is subject to PSD and LAER requirements.
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Conditions E9-1 and E9-2 apply to source 50-0054-09

E9-1. Solvent input restriction.

Maximum solvent input to this source shall not exceed 234 pounds per hour on a monthly average basis.

TAPCR 1200-03-09-.01(4), construction permit #996654P issued pursuant to a November 28, 1988 PSD

Compliance Method: Compliance with this restriction shall be demonstrated by monthly recordkeeping of solvent usage and production time. A log of the solvent input and operating hours shall be kept in the format provided in **Condition E3-4**. Reports and certifications shall be submitted in accordance with **Condition E2** of this permit.

E9-2. Volatile organic compounds (VOC) emission limitation.

Maximum VOC emitted from this source shall not exceed 9.75 pounds per hour on a monthly average basis (42.7 TPY).

TAPCR 1200-03-09-.01(4), construction permit #996654P issued pursuant to a November 28, 1988 PSD

Compliance Method: Compliance with this limitation shall be demonstrated by the recordkeeping required by **Condition E9-1**. The permittee shall maintain the solvent input log in the format prescribed in **Condition E3-4**. A correlation has been established between the quantity of materials input to the metallizers and the VOC content of the rolls (emission factor). Reports and certifications shall be submitted in accordance with **Condition E-2** of this permit.

E9-3. Visible emissions.

Visible emissions from this source shall not exceed 20% opacity as specified in Rule 1200-03-05-.01 of the TAPCR (aggregate count). Visible emissions from stacks shall be determined by Tennessee Visible Emission Evaluation Method 2 as adopted by the Tennessee Air Pollution Control Board on August, 24, 1984.

TAPCR 1200-03-05-.01, construction permit #996654P issued pursuant to a November 28, 1988 PSD

Compliance Method: The permittee shall assure compliance with the opacity standard by utilizing the opacity matrix dated June 18, 1996 that is enclosed as Attachment 1. Reports and certifications shall be submitted in accordance with **Condition E2** of this permit.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

50-0054-12	Storage Tank	This source consists of one 12,000 gallon storage tank. This tank shall be labeled Tank 12. It is subject to NSPS Subpart Kb requirements.
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Conditions E10-1 and E10-2 apply to source 50-0054-12

E10-1. General Capacity.

The stated design capacity of the storage tank is 12,000 gallons. This condition is a statement of the capacity for the source. Should the permittee need to modify the source in a manner that increases the capacity, a Title V modification shall first be applied for and received in accordance with TAPCR 1200-03-09-.01 and TAPCR 1200-03-09-.02(11)(d)1(i)(V) prior to making the change.

TAPCR 1200-03-09-.03(8) and the application dated May 27, 2021 from the permittee

E10-2. Recordkeeping requirements.

Pursuant to 40 CFR 60 Subpart Kb, the owner shall maintain readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. Such records shall be made and maintained on file available for inspection by the Technical Secretary or a Division representative.

40 CFR 60 Subpart Kb, TAPCR 1200-03-09-.02(11)(e)1.(i), TAPCR 1200-03-09-.03(8)

50-0054-13**Chrome Plating**

This source consists of the hard chrome electroplating operations with packed bed scrubber control for PM emissions. It is subject to NESHAP Subpart N requirements.

Conditions E11-1 through E11-3 apply to source 50-0054-13

E11-1. Subpart N requirements.

Pollution control equipment (packed bed scrubber) used by this source shall comply with all requirements in 40 CFR Part 63 Subpart N-National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks. These requirements are incorporated into this permit under the authority of TAPCR 1200-03-09-.03(8).

(a) Recordkeeping Requirements.

The owner or operator of each affected source subject to these standards shall fulfill all recordkeeping requirements outlined in §63.346 and in the General Provisions to 40 CFR part 63, according to the applicability of subpart A of part 63 as identified in Table 1 of subpart N of part 63. The owner or operator of an affected source subject to the provisions of subpart N of part 63 shall maintain the following records for such source:

- (1) Inspection records for the add-on air pollution control device, if such a device is used, and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of §63.342(f) and Table 1 of §63.342 have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection.
- (2) Records of all maintenance performed on the affected source, the add-on air pollution control device, and monitoring equipment;
- (3) Records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control, and monitoring equipment;
- (4) Records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan;
- (5) Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the updated operation and maintenance plan received July 17, 1997, as required by §63.342(f)(3);
- (6) Test reports documenting results of all performance tests;
- (7) All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance with the special compliance procedures of §63.344I;
- (8) Records of monitoring data required by §63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected;
- (9) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control, or monitoring equipment;
- (10) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control, or monitoring equipment;
- (11) The total process operating time of the affected source during the reporting period;
- (12) Any information demonstrating whether a source is meeting the requirements for a waiver of recordkeeping or reporting requirements, if the source has been granted a waiver under §63.10(f) of subpart A of part 63; and
- (13) All documentation supporting the notifications and reports required by §63.9, §63.10 of subpart A of part 63 and §63.347 of subpart N of part 63.
- (14) All records shall be maintained for a period of 5 years in accordance with §63.10(b)(1) of subpart A of part 63.

(b) Contents of ongoing compliance status reports. (§63.347(g)(3))

The owner or operator of an affected source for which compliance monitoring is required in accordance with §63.343(c) shall prepare a summary report to document the ongoing compliance status of the source. The report must contain the following information:

- (1) The company name and address of the affected source;
- (2) An identification of the operating parameter that is monitored for compliance determination, as required by §63.343(c);

- (3) The relevant emission limitation for the affected source, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the notification of compliance status required by paragraph (e) of §63.347;
- (4) The beginning and ending dates of the reporting period;
- (5) A description of the type of process performed in the affected source;
- (6) The total operating time of the affected source during the reporting period;
- (7) If this source is a hard chromium-electroplating tank and the owner or operator is limiting the maximum cumulative rectifier capacity in accordance with §63.342(c)(2), the actual cumulative rectifier capacity expended during the reporting period, on a month-by-month basis;
- (8) A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes;
- (9) A certification by a responsible official, as defined in §63.2(subpart A), that the work practice standards in §63.342(f) were followed in accordance with the operation and maintenance plan for the source;
- (10) If the operation and maintenance plan required by §63.342(f)(3) was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the report(s) required by §63.342(f)(3)(iv) documenting that the operation and maintenance plan was not followed;
- (11) A description of any changes in monitoring, processes, or controls since the last reporting period;
- (12) The name, title, and signature of the responsible official who is certifying the accuracy of the report; and
- (13) The date of the report.

(c) Reports of exceedances. (§63.347(h)(2))

If both of the following conditions are met, semiannual reports shall be prepared and submitted to the Technical secretary:

- (1) The total duration of excess emissions (as indicated by the monitoring data collected by the owner or operator of the affected source in accordance with §63.343(c)) is 1% or greater of the total operating time for the reporting period; and
- (2) The total duration of malfunctions of the add-on air pollution control device and monitoring equipment is 5% or greater of the total operating time.

Once an owner or operator of an affected source reports an exceedance as defined in paragraph §63.347(h)(2)(i), ongoing compliance status reports shall be submitted semiannually until a request to reduce reporting frequency under paragraph §63.347(h)(3) is approved.

(d) Immediate startup, shutdown, and malfunction reports. (§63.342(f)(3)(iv))

If actions taken by the owner or operator during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan required by paragraph (f)(3)(i) of this section, the owner or operator shall record the actions taken for that event and shall report by phone such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the owner or operator makes alternative reporting arrangements, in advance, with the Administrator.

(e) NESHAP Reports

NESHAP semiannual reporting periods are synchronized with the semiannual reporting periods for the Title V permit (for **Condition E11-1** and **E11-2**). The semiannual reporting periods of October-March and April-September have been established as stipulated in **Condition E2(a)**

These reports must be certified by a responsible official consistent with Condition B4 of this permit and shall be separately submitted to The Technical Secretary at the email address below. In lieu of emailing a copy of the report, the permittee may submit a paper copy of the report to the address below.

<p>Division of Air Pollution Control William R. Snodgrass Tennessee Tower 312 Rosa L. Parks Avenue, 15th Floor Nashville, Tennessee 37243</p>	<p>OR</p>	<p>Or by email to: Air.Pollution.Control@tn.gov</p>
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E11-2. Chromium emissions.

Total chromium emitted from this source shall not exceed 1.3×10^{-5} grains per dry standard cubic foot (0.01 lb/hr) as stipulated in 40 CFR 63.342, July 1, 1995.

Compliance Method: Compliance with this limitation shall be demonstrated by periodic monitoring and recordkeeping. The velocity pressure at the inlet to the packed bed scrubber and the pressure drop across the scrubber system shall be monitored and recorded once each day when the source is operating. To be in compliance with the standards, the scrubber shall be operated within $\pm 10\%$ of the velocity pressure value established during the initial performance test (0.5 inches of water) and within 1 inch of water column of the pressure drop value established during the initial performance test (1.9 inches of water).

The facility's operation and maintenance plan submitted on July 17, 1997 is incorporated by reference into this permit. Revisions shall be in accordance with §63.342(f)(3)(ii). Additionally, the work practices described below shall be implemented:

Once every quarter visually inspect:

- (a) control device to ensure there is proper drainage, no chromic acid buildup on the mesh pads, and no evidence of chemical attack on the structural integrity of the control device, and
- (b) back portion of the chevron mist eliminator to ensure there it is dry and there is no breakthrough of chromic acid mist, and
- (c) ductwork from tank or tanks to the control device to ensure there are no leaks, and
- (d) nozzles for proper operation

Annually:

- (e) add fresh make-up water to the top of the packed bed.

Records shall be kept to document compliance with the above work practice methods. The record may take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection.

E11-3. Visible emissions.

Visible emissions from this source shall not exhibit greater than 20% opacity, except for one six-minute period in any one hour period, and for no more than four six-minute periods in any twenty-four hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

TAPCR 1200-03-05-.03(6) and TAPCR 1200-03-05-.01(1)

Compliance Method: The permittee shall assure compliance with the opacity standard by utilizing the opacity matrix dated June 18, 1996 that is enclosed as Attachment 1. Reports and certifications shall be submitted in accordance with **Condition E2** of this permit.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

50-0054-14

Flexographic printing

This source consists of one flexographic printer, in line with cutter 5. It is subject to PSD and LAER requirements. A thermal oxidizer is used for control when using one or more solvent-based inks.

Conditions E12-1 through E12-4 apply to source 50-0054-14

E12-1. Material input restriction.

The input capacity for this source shall not exceed 2,880 pounds of ink solvents per day, on a monthly average basis.

TAPCR 1200-03-09-.01(4), permit #731528P issued April 17, 1991.

Compliance Method: Compliance with this restriction shall be demonstrated through recordkeeping. A log of monthly ink usage must be maintained at the source location in the format prescribed in **Condition E3-4**. Reports and certifications shall be submitted in accordance with **Condition E2** of this permit.

E12-2. Volatile organic compounds (VOC) emission limitation.

Maximum VOC emitted from this source shall not exceed 34.5 pounds per hour, on a monthly average basis (151.1 TPY).

TAPCR 1200-03-09-.01(4), permit #731528P issued April 17, 1991

Compliance Method: Compliance with this limitation shall be demonstrated by recordkeeping, calculation of emissions on a monthly basis, and continuous monitoring. The permittee shall maintain the ink input log in the format prescribed in **Condition E3-4**. A VOC emission factor of 22% shall be used when solvent-based inks are used. This is based on capture of VOC by fume hoods and destruction in the thermal oxidizer. The overall VOC reduction (including capture efficiency and destruction efficiency) of the thermal oxidizer controlling the flexographic printers shall be at least 69% unless water based flexographic ink is being used exclusively. The thermal oxidizer operating temperature shall be continuously monitored and recorded when running. A minimum operating temperature of 1200° F (± 50° F) shall be maintained (3 hour data averages) to assure an efficiency of 78%. This is based on the stack test performed for the thermal oxidizer in September 1989. Reports and certifications shall be submitted in accordance with **Condition E2** of this permit.

E12-3. Volatile organic compounds (VOC) emission limitation using flexographic ink.

When using water based flexographic ink, VOC emission rate shall not exceed 8.0 pounds per hour, on a monthly average basis. Water based flexographic ink is defined as ink which contains no more than 20% VOC by weight, and which also contains no more than 1.7 pounds of VOC per gallon of ink.

TAPCR 1200-03-09-.01(4)

Compliance method: Compliance with this limitation shall be demonstrated by recordkeeping and calculation of emissions on a monthly basis. The permittee shall maintain the ink usage log as prescribed in **Condition E3-4**. A VOC emission factor of 100% shall be used when water based inks are being used exclusively. Reports and certifications shall be submitted in accordance with **Condition E2** of this permit.

E12-4. Visible emissions.

Visible emissions shall not exhibit greater than 20% opacity, except for one six-minute period in any one hour period, and for no more than four six-minute periods in any twenty-four hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

TAPCR 1200-03-05-.01(1) and 1200-03-05-.03(6), permit #731528P issued April 17, 1991

Compliance Method: The permittee shall assure compliance with the opacity standard by utilizing the opacity matrix dated June 18, 1996 (amended on September 11, 2013) that is enclosed as Attachment 2. Reports and certifications shall be submitted in accordance with **Condition E2** of this permit.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

50-0054-15	Flexographic printing	This source consists of one flexographic printer, in line with cutter 7, which uses water-based ink exclusively.
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Conditions E13-1 through E13-3 apply to source 50-0054-15

E13-1. Material input restriction.

Only water based flexographic ink shall be used for this source.

TAPCR 1200-03-09-.01(4)

Compliance method: The permittee shall maintain documentation to demonstrate the type of ink used by the flexographic printer. Documentation shall include, but is not limited to, manufacturer's specifications, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

E13-2. Volatile organic compounds (VOC) emission limitation.

Maximum VOC emitted from this source shall not exceed 8.0 pounds per hour, on a monthly average basis (35.0 tons/year).

TAPCR 1200-03-07-.07(2)

Compliance Method: Compliance with this limitation shall be demonstrated by recordkeeping and calculation of emissions on a monthly basis. The permittee shall maintain the input log in the format prescribed in **Condition E3-4**. A VOC emission factor of 100% shall be used for water-based inks. Reports and certifications shall be submitted in accordance with **Condition E2** of this permit.

E13-3. Visible emissions.

Visible emissions shall not exhibit greater than 20% opacity, except for one six-minute period in any one hour period, and for no more than four six-minute periods in any twenty-four hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

TAPCR 1200-03-05-.01(1) and 1200-03-05-.03(6)

Compliance Method: The permittee shall assure compliance with the opacity standard by utilizing the opacity matrix dated June 18, 1996 (amended on September 11, 2013) that is enclosed as Attachment 2. Reports and certifications shall be submitted in accordance with **Condition E2** of this permit.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements

50-0054-17	Flexographic Printing	One 10-station Flexographic UV Printer with a 20 KVA Corona Treater to improve adhesion of ink.
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Conditions E14-1 through E14-4 apply to source 50-0054-17

E14-1. Material input limitation.

The input capacity for this source shall not exceed 4,430 pounds of ink, coatings, and solvents per day, on a monthly average basis.

TAPCR 1200-03-07-.07(2)

Compliance Method: Compliance with this restriction shall be demonstrated through recordkeeping. A log of monthly usage of ink and coatings must be maintained at the source location in the format prescribed in **Condition E3-4**. Reports and certifications shall be submitted in accordance with **Condition E2** of this permit.

E14-2. Volatile organic compounds including hazardous air pollutants (VOC/HAPs) emission limitation using flexo-ink.

The VOC/HAP content of UV cured ink and EB cured coatings shall not exceed 1.0% by weight, on a monthly average basis.

TAPCR 1200-03-07-.07(2)

Compliance method: Compliance with this limitation shall be demonstrated by vendor certification and recordkeeping.

E14-3. Volatile organic compounds (VOC/HAP) emission limitation.

Maximum VOC emitted from this source shall not exceed 0.9 tons per month.

TAPCR 1200-03-07-.07(2)

Compliance Method: Compliance with this limitation shall be demonstrated by recordkeeping and calculation of emissions on a monthly basis. The permittee shall maintain the chemical usage (inks, coatings, and solvents) input log in the format prescribed in **Condition E3-4** of this permit. Reports and certifications shall be submitted in accordance with **Condition E2** of this permit

E14-4. Visible emissions.

Visible emissions shall not exhibit greater than 20% opacity, except for one six-minute period in any one hour period, and for no more than four six-minute periods in any twenty-four hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

TAPCR 1200-03-05-.01(1) and 1200-03-05-.03(6)

Compliance Method: The permittee shall assure compliance with the opacity standard by utilizing the opacity matrix dated June 18, 1996 (amended on September 11, 2013) that is enclosed as Attachment 1. Reports and certifications shall be submitted in accordance with **Condition E2** of this permit.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

END OF PERMIT NUMBER: 579087

DRAFT

ATTACHMENT 1

**OPACITY MATRIX DECISION TREE for
VISIBLE EMISSION EVALUATION METHODS 9 and 2**

Decision Tree PM for Opacity for Sources Utilizing EPA Method 9*

Notes:

PM = Periodic Monitoring required by 1200-03-09-.02(11)(e)(iii).

This Decision Tree outlines the criteria by which major sources can meet the periodic monitoring and testing requirements of Title V for demonstrating compliance with the visible emission standards set forth in the permit. It is not intended to determine compliance requirements for EPA's Compliance Assurance Monitoring (CAM) Rule (formerly referred to as Enhanced Monitoring – Proposed 40 CFR 64).

Examine each emission unit using this Decision Tree to determine the PM required.*

Use of continuous emission monitoring systems eliminates the need to do any additional periodic monitoring.

Visible Emission Evaluations (VEEs) are to be conducted utilizing EPA Method 9. The observer must be properly certified to conduct valid evaluations.

Typical Pollutants

Particulates, VOC, CO, SO₂, NO_x, HCl, HF, HBr, Ammonia, and Methane.

Initial observations are to be repeated within 90 days of startup of a modified source, if a new construction permit is issued for modification of the source.

A VEE conducted by TAPCD personnel after the Title V permit is issued will also constitute an initial reading.

Reader Error

EPA Method 9, Non-NSPS or NESHAPS stipulated opacity standards:

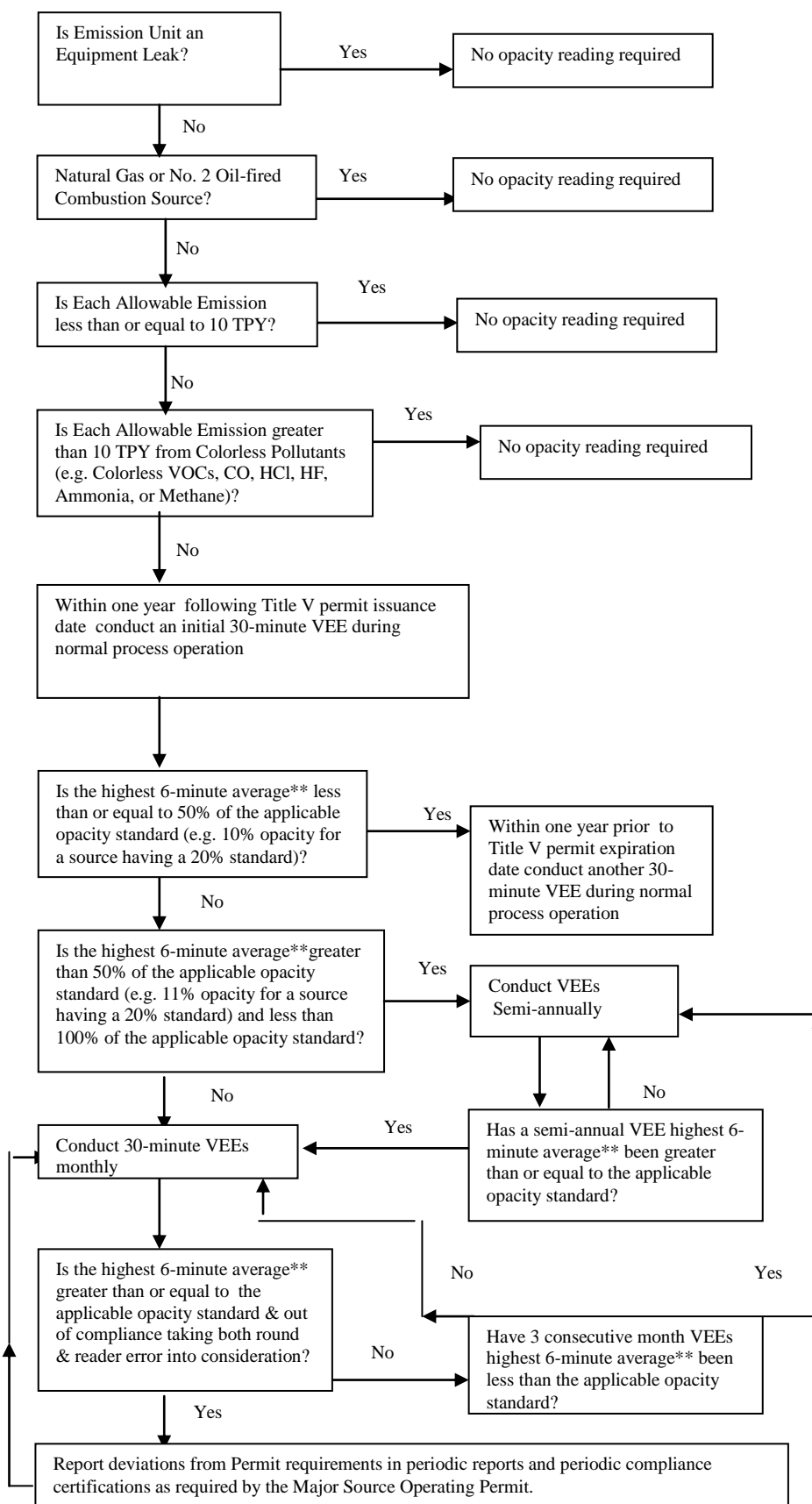
The TAPCD guidance is to declare non-compliance when the highest six-minute average** exceeds the standard plus 6.8% opacity (e.g. 26.8% for a 20% standard).

EPA Method 9, NSPS or NESHAPS stipulate opacity standards:

EPA guidance is to allow only engineering round. No allowance for reader error is given.

*Not applicable to Asbestos manufacturing subject to 40 CFR 61.142

**Or second highest six-minute average, if the source has an exemption period stipulated in either the regulations or in the permit.



**Decision Tree PM for Opacity for
Sources Subject to Rule 1200-03-05-.01
Utilizing TVEE Method 2**

Notes:

PM = Periodic Monitoring required by 1200-03-09-.02(1)(c)(iii).

This Decision Tree outlines the criteria by which major sources can meet the periodic monitoring and testing requirements of Title V for demonstrating compliance with the visible emission standard in Rule 1200-03-05-.01. It is not intended to determine compliance requirements for EPA's Compliance Assurance Monitoring (CAM) Rule (formerly referred to as Enhanced Monitoring - Proposed 40 CFR 64).

Examine each emission unit using this Decision Tree to determine the PMT required.

Use of continuous emission monitoring systems eliminates the need to do any additional periodic monitoring.

Visible Emission Evaluations (VEEs) are to be conducted utilizing Tennessee Visible Emission Evaluation Method 2. The observer must be properly certified according to the criteria specified in EPA Method 9 to conduct TVEE Method 2 evaluations.

Typical Pollutants
Particulates, VOC, CO, SO₂, NO_x, HCl, HF, HBr, Ammonia, and Methane.

Initial observations are to be repeated within 90 days of startup of a modified source, if a new construction permit is issued for modification of the source.

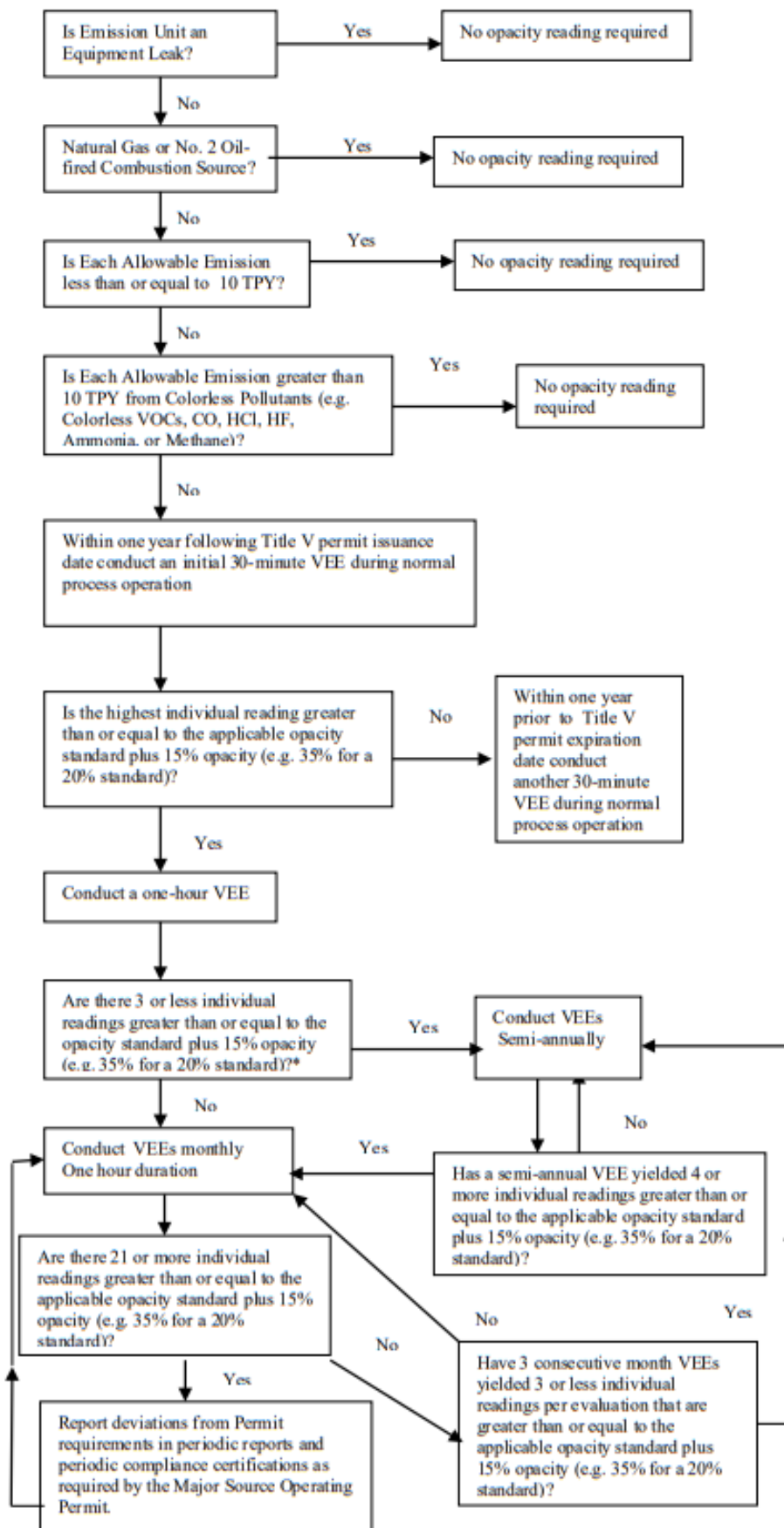
A VEE conducted by TAPCD personnel after the Title V permit is issued will also constitute an initial reading.

Reader Error
TVEE Method 2: The TAPCD declares non-compliance when 21 observations are read at the standard plus 15% opacity (e.g. 35% for a 20% standard).

*The rationale for this is the fact that Rule 1200-03-05-.01 allows for an exemption of 5 minutes (20 readings) per hour and up to 20 minutes (80 readings) per day. With 4 or more excessive individual readings per hour the possibility of a daily exceedance exists.

Note: A company could mutually agree to have all of its sources regulated by EPA Method 9. Caution: Agreement to use Method 9 could potentially place some sources in non-compliance with visible emission standards. Please be sure before you agree.

Dated June 18, 1996
Amended September 11, 2013



ATTACHMENT 2

TITLE V FEE SELECTION FORM



DEPARTMENT OF ENVIRONMENT AND CONSERVATION
 DIVISION OF AIR POLLUTION CONTROL
 William R. Snodgrass Tennessee Tower
 312 Rosa L. Parks Avenue, 15th Floor, Nashville, TN 37243
 Telephone: (615) 532-0554, Email: Air.Pollution.Control@TN.gov

APC 36

TITLE V FEE SELECTION

Type or print and submit to the email address above.			
FACILITY INFORMATION			
1. Organization's legal name and SOS control number [as registered with the TN Secretary of State (SOS)]			
2. Site name (if different from legal name)			
3. Site address (St./Rd./Hwy.)			County name
City			Zip code
4. Emission source reference number		5. Title V permit number	
FEE SELECTION			
This fee selection is effective beginning January 1, _____. When approved, this selection will be effective until a new Fee Selection form is submitted. Fee Selection forms must be submitted on or before December 31 of the annual accounting period.			
6. Payment Schedule (choose one):			
Calendar Year Basis (January 1 – December 31) <input type="checkbox"/>		Fiscal Year Basis (July 1 – June 30) <input type="checkbox"/>	
7. Payment Basis (choose one):			
Actual Emissions Basis <input type="checkbox"/>		Allowable Emissions Basis <input type="checkbox"/>	Combination of Actual and Allowable Emissions Basis <input type="checkbox"/>
8. If Payment Basis is "Actual Emissions" or "Combination of Actual and Allowable Emissions", complete the following table for each permitted source and each pollutant for which fees are due for that source. See instructions for further details.			
Source ID	Pollutant	Allowable or Actual Emissions	If allowable emissions: Specify condition number and limit. If actual emissions: Describe calculation method and provide example. Provide condition number that specifies method, if applicable.

ATTACHMENT 3

General Provision for 40 CFR Part 60, Subpart Kb

You are required to comply with the following General Provisions of the federal Standards of Performance for New Stationary Sources (NSPS):

General provisions citation 40 CFR	Subject of citation	Applies to subpart	Explanation
§60.1	General applicability of the General Provisions	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.2	Definitions	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.3	Units and abbreviations	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.4	Address	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.5	Determination of construction or modification	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.6	Review of plans	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.7	Notification and Recordkeeping	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.8	Performance tests	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§60.9	Availability of information	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.10	State Authority	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.11	Compliance with standards and maintenance requirements	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.12	Circumvention	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§60.13	Monitoring requirements	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.14	Modification	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.15	Reconstruction	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.16	Priority list	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.17	Incorporations by reference	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.18	General control device requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§60.19	General notification and reporting requirements	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

ATTACHMENT 4

General Provision for 40 CFR Part 63, Subpart N

You are required to comply with the following General Provisions of the federal National Emission Standards for Hazardous Air Pollutants (NESHAP):

General Provisions Citation 40 CFR	Subject of Citation	Applies to Subpart	Explanation
§63.1	Applicability	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§63.2	Definitions	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§63.3	Units and Abbreviations	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§63.4	Prohibited Activities and Circumvention	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§63.5	Preconstruction Review and Notification Requirements	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Except replace the term “source” and “stationary source” in § 63.5(a) (1) and (2) of subpart A with “affected sources.”
§63.6(a), (b), (c)	Compliance with Standards and Maintenance Requirements— Applicability Compliance Dates	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§63.6(e)	Operation and Maintenance Requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.6(f), (g), (i), (j)	Compliance with Non-opacity Emission Standards	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§63.7(a), (e), (f), (g), (h)	Performance Testing Requirements	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§63.8	Monitoring Requirements	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§63.9	Notification Requirements	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§63.10	Recordkeeping and Reporting Requirements	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§63.11	Control Device Requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.12	State Authorities and Delegations	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§63.13	Addresses	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§63.14	Incorporations by Reference	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§63.15	Availability of Information and Confidentiality	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§63.16	Performance Track Provisions	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	