

PUBLIC NOTICE

**Mundet Tennessee, Inc.** has applied to the Tennessee Air Pollution Control Division (TAPCD) for a federally enforceable state operating permit to opt out of being subject to the provisions of paragraph 1200-03-09-.02(11) of the Tennessee Air Pollution Control Regulations (also frequently referred to as Title V regulations). Mundet Tennessee, Inc. has agreed to be bound by permit limits that limit their potential to emit Volatile Organic Compounds (VOCs) to less than 100 tons per year, a single hazardous air pollutant (HAP) to less than 10 tons per year, and a combination of hazardous air pollutants (HAPs) to less than 25 tons per year. Mundet Tennessee, Inc. has agreed to use record keeping methods to prove that they are abiding by more restrictive emission limits.

The applicant is **Mundet Tennessee, Inc.** with a site address of 170 Geiger Road, Surgoinsville, Tennessee. They seek to obtain a Conditional Major operating permit for their rotogravure printing and waste paper handling facility. It should be noted that the company has a current major source operating permit for this facility.

The TAPCD has made the determination that this facility can be approved to opt out of being subject to Title V regulations if certain conditions are met. A copy of the materials used by the TAPCD in making this determination and a copy of the draft permit are available for public inspection during normal business hours at the following locations:

<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:

The Technical Secretary Division of Air Pollution Control Johnson City Environmental Field Office 2305 Silverdale Road Johnson City, TN 37601-2162	and	Tennessee Department of Environment and Conservation Division of Air Pollution Control William R. Snodgrass TN Tower 312 Rosa L. Parks Avenue 15 <sup>th</sup> Floor Nashville, TN 37243
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Electronic copies of the draft permits are available by accessing the TDEC internet site located at:

<http://www.tn.gov/environment/topic/ppo-air>

Questions concerning the source(s) may be addressed to Mr. Eric King at (615)-532-0546 or by e-mail at [Eric.King@tn.gov](mailto:Eric.King@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 July 17, 2020. 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 15<sup>th</sup> Floor, Nashville, Tennessee 37243.
2. **E-mail:** Submit electronic comments to [air.pollution.control@tn.gov](mailto: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.

(Do not publish text below the dotted line)

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For the Hawkins County "Rogersville Review" -- publish once during the time period of June 10 through June 17, 2020

AIR POLLUTION CONTROL DATE: JUNE 10, 2020

Assigned to –Eric King

**No alterations to the above are allowed:**

**Mundet Tennessee, Inc., must pay to place this advertisement in the newspaper.**

Air Pollution Control must be furnished with an affidavit from the newspaper stating that the ad was run and the date of the ad or one complete sheet from the newspaper showing this advertisement, the name of the newspaper and the date of publication. Mail to Eric King, Division of Air Pollution Control, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue, 15<sup>th</sup> Floor, Nashville, Tennessee 37243 or send a pdf copy of this information electronically to [air.pollution.control@tn.gov](mailto:air.pollution.control@tn.gov) .

## STATEMENT OF BASIS (First Time CM)

<b>Facility Name:</b> Mundet Tennessee, Inc.
<b>City:</b> Surgoinsville
<b>County:</b> Hawkins
<b>Date Application Received:</b> February 8, 2019
<b>Date Application Deemed Complete:</b> February 8, 2019
<b>Emission Source Reference No.:</b> 37-0076
<b>Permit Nos.:</b> 476337

### INTRODUCTION

This narrative is being provided to assist the reader in understanding the content of permit. This Statement is written pursuant to Tennessee Air Pollution Control Rule 1200-03-09-.02(11)(f)1.(v). The primary purpose of the conditional major operating permit is to consolidate and identify existing state and federal air requirements applicable to **Mundet Tennessee, Inc.** (MTI) and to provide practical methods for determining compliance with these requirements. The Permittee has requested surrender of their Title V permit and has proposed limits to opt out of the major source operating permit program requirements specified in TAPCR 1200-03-09-.02(11). 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  
GHGs – green house gas

#### **I. Identification Information**

##### A. Source Description

List and describe emission source(s): **37-0076 Mundet Tennessee, Inc.**

Graphic Arts Manufacturing Plant subject to 40 CFR 60 (NSPS) Subpart QQ and 40 CFR 63 (MACT) Subpart KK Area Source

37-0076-01: Rotogravure printing process with 2-RTOs (regenerative thermal oxidizers: RTO #1 and RTO #2) control devices. This source consists of the follow: printing presses (Nos. 28, 29, and 30), ink hose tank, floor mopping and press cleanup);

37-0076-02: Wastepaper handling operation with baler and cyclone with baghouse emission control. This source consists of the follow: slitters, balers, and associated equipment used to recycle wastepaper.

##### B. Facility Classification

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

C. Regulatory Status

1. PSD/NSR: *This facility is not 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	No	Yes
PM <sub>10</sub>	N/A	N/A	N/A
SO <sub>2</sub>	Yes	No	Yes
VOC	Yes	No	Yes
NO <sub>x</sub>	Yes	No	Yes
CO	Yes	No	Yes
CO <sub>2e</sub> (GHG)	Yes	No	Yes
Individual HAP	Yes	No	Yes
Total HAPs	Yes	No	Yes

3. MACT Standards: This facility is **NOT** a major source for HAPs. This facility is subject to a proposed or final MACT Standard.

List MACT Rule(s) if applicable:

Graphic Arts Manufacturing Plant, MACT Area Source rules 40 CFR §63.826 of 40 CFR Part 63, Subpart KK

4. Program Applicability: Are the following programs applicable to the facility?  
 PSD *No*  
 NESHAP *Yes (area source for MACT: 40 CFR 63 Subpart KK)*  
 NSPS *Yes (area source for NSPS: 40 CFR 60 Subpart QQ)*

**II. Compliance Information**

- A. Compliance Status:  
 Is the facility currently in compliance with all applicable requirements? *yes*  
  
 If no, explain.
- B. 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. Prevention of Accidental Releases: **Not Applicable**

**IV. Public Participation Procedures**

Notification of this draft permit was mailed to the following environmental agencies:

- A. U.S. EPA Region IV
- B. State of Kentucky
- C. State of North Carolina, Division of Air Quality
- D. State of Virginia
- E. Johnson City Environmental Field Office

## V. Title V Permit History

### Permitting activities since original permit issuance (Previous Title V Permit 553946)

1. A significant modification to title V permit 553946 was required because of a significant emission increase. New ownership requested to add a printing line which resulted in the VOC emission increase of more the 40 TPY. After the increase, the facility is under the classification of major source for PSD purposes. The significant modification was issued February 12, 2008.
2. The control device (catalytic oxidizer) underwent complete replacement. With the addition of the printing line and control device replacement, VOC emissions are controlled by two regenerative thermal oxidizers. New compliance assurance methods and techniques were applied since the facility is subject to specific requirements for NSPS control device equipment.
3. Changes also included two administrative amendment (AA) requests that came in during the significant modification process. One AA is for ownership change and the other is for responsible official name change. Since these were included with the significant modification, the same issue date applies.

### Permit renewal changes

1. On June 27, 2005, there was a minor modification to title V permit 553946 (issued May 26, 2005) changing conditions related to source 37-0076-02 (wastepaper handling operations).
2. Title V permit 553946 expired and this permit is a renewal with revised requirements and conditions.
3. The renewal includes an administrative amendment to change the responsible official. It also includes a minor modification request where a control device has been changed (cyclone to baghouse exhausting inside the building for source 37-0076-02).
4. The renewal includes a second operating scenario where bypassing emission control equipment is allowed because of low VOC concentration to the RTO. The second scenario provides details in which one press uses water based coatings (inks) with very little VOC.

### Minor Modification #1 change to 563209

1. On June 25, 2015, MTI installed a new caustic cleaning operation with ink-jet printing. Both operations are insignificant. Press Number 27 was shut down and removed in 2009, so there will be a new VOC permitted limit of 199 tons per year. This puts the facility in a lower fee bracket below 250 tons per year.
2. Permit Conditions A12, E2, E3-2, E3-3, E3-5, E3-8, E3-9, E4-2, E4-6, E4-9, and E4-11 were updated. The facility description on page 14 and the source description on page 20 were also updated.

### Administrative Amendment #1 to 563209

1. Permit was amended to fix several typographical errors in Condition E2-1 related to the relevant responsible officials.
2. Condition E2b was updated with new permitting language.

### Permit renewal changes to 572143

1. Responsible official as changed to Ms. Carol A. Rod, General Manager, with an update from the permittee dated 05/30/2017. See Condition E2-1
2. Table of contents was simplified.
3. Condition E1 was updated.
4. Condition E2(a) was made more general.
5. The compliance assurances for Conditions E4-2 through E4-6 were updated.

### Administrative Amendment #1 to 572143

1. Fix typographical error in Condition E2(a)
2. Repairs to RTO #2. This will not require changes to the permit. See letter from permittee dated 2-12-18.

### **Request to surrender the Title V permit**

In a letter dated January 22, 2019, the Permittee requested that their Title V permit be surrendered and be replaced with a Conditional Major Operating Permit.

The Permittee is placed on notice that **Condition G3** of Condition Major Operating Permit #476337 contains limitations that allow the Permittee to opt out of the major source operating permit program requirements specified in TAPCR 1200-03-09-.02(11). Failure to abide by these limits will not only subject the Permittee to enforcement action by the State of Tennessee, but it may also result in the imposition of Federal enforcement action by the United States Environmental Protection Agency and the loss of being Federally recognized as a conditional major source.



**OPERATING PERMIT** (Conditional Major) Issued Pursuant to Tennessee Air Quality Act

Date Issued: TBD

Draft Permit Number:  
476337

Date Expires: May 1, 2030

Facility ID: 37-0076

Issued To:  
**Mundet Tennessee, Inc.**

Installation Address:  
170 Geiger Road  
Surgoinsville

Installation Description:

**Source 01:** 3-Rotogravure Printing Presses (# 28, #29, and #30),  
Ink Holding Tank, Floor Mopping and Press Cleanup with  
2-RTO Control Devices

**Source 02:** Wastepaper Handling and Baler Operation with Cyclone  
and Baghouse Control

Emission Source Reference No.  
**37-0076**

**Conditional Major**  
NSPS (Subpart QQ)  
NESHAP (Subpart KK)

The holder of this permit shall comply with the conditions contained in this permit as well as all applicable provisions of the Tennessee Air Pollution Control Regulations (TAPCR).

CONDITIONS:

- G1.** The applications that was utilized in the preparation of this permit are dated January 22, 2019, and April 23, 2020, and are signed by Craig Walter, Facility Manager, and Carol Rod, General Manager (the new responsible official), of the permitted facility. If Carol Rod terminates employment or is assigned different duties and is no longer the responsible person to represent and bind the facility in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification shall be in writing and submitted within thirty (30) days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the facility in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit 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 covenants.

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

(conditions continued on next page)

Draft

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**

General Conditions for this facility are as follows, unless otherwise noted.

## G2. Visible and Fugitive Emissions

- A. Visible emissions from this facility shall not exhibit greater than twenty percent opacity, except for one six-minute period in any 1 hour period, and for no more than 4 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)

- B. 1) No person shall 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:

- (a) 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;
- (b) Application of asphalt, water, or suitable chemicals on dirt roads, material stock piles, and other surfaces which can create airborne dusts;
- (c) 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.

2) No person shall cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five minutes per hour or twenty 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 TAPCR 1200-03-20. Fugitive emissions from this source shall be determined by Tennessee Visible Emissions Evaluation Method 4 as adopted by the Tennessee Air Pollution Control Board on April 16, 1986.

TAPCR 1200-03-08-.01(1) and 1200-03-08-.01(2)

- C. Visible emissions from roads and parking areas shall not exhibit greater than ten percent opacity utilizing Tennessee Visible Emissions Evaluation (TVEE) Method 1, as adopted by the Tennessee Air Pollution Control Board on April 29, 1982, as amended on September 15, 1982 and August 24, 1984.

TAPCR 1200-03-08-.03

## G3. Facility Wide Limitations

- A. Total VOCs emitted from this facility shall not exceed 95.0 tons per year. This emission limitation is established pursuant to Rule 1200-03-09-.02-(11)(a) of the Tennessee Air Pollution Control Regulations (TAPCR) and the agreement letter dated January 22, 2019 (Attachment 1), from the permittee. This limit includes all exempt and insignificant sources.

VOC emissions from exempt and insignificant sources at this facility, including aerosol-can spraying, storage tanks, small boilers, space heaters, gas-fired water heaters, etc. are estimated to be less than 9.14 tons per year under maximum operating conditions. In order to avoid the necessity of keeping emission records, the total plant-wide VOC emissions from these exempt and insignificant sources will be estimated as 9.14 tons per 12-consecutive month periods. This estimate is based on the permittee's letter dated May 5, 2020. TAPCR 1200-03-09-.02(11)(a)

**Compliance Method:** Compliance with this limit shall be demonstrated by compliance with **Conditions S1-9, S1-11, S1-12**, and the records required by **Conditions G23 and S1-10**.

- B. The total of any single HAP emitted from this facility shall not exceed 9.9 tons per year. The total of all combined HAPs emitted from this facility shall not exceed 24.9 tons per year. These emission limitations are established pursuant to Rule 1200-03-09-.02-(11)(a) of the Tennessee Air Pollution Control Regulations

(TAPCR) and the agreement letter dated January 22, 2019 (Attachment 1), from the permittee. These limits include all exempt and insignificant sources.

**Compliance Method:** Compliance with this limit shall be demonstrated by compliance with **Conditions S1-9, S1-11, S1-12**, and the records required by **Conditions G23 and S1-10**.

TAPCR 1200-03-09-.02-(11)(a) and the agreement letters dated January 22, 2019, and May 5, 2020 (Attachment 1)

#### **G4. Routine Maintenance Requirements**

The Permittee shall maintain and repair the emission source(s), associated air pollution control device(s), and compliance assurance monitoring equipment as required to maintain and assure compliance with the specified emission limits.

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

**Compliance Method:** Records of all repair and maintenance activities required above shall be recorded in a suitable permanent form and kept available for inspection by the Division. These records must be retained for a period of not less than five years. The date each maintenance and repair activity began shall be entered in the log no later than thirty days following the start of the repair or maintenance activity, and the completion date shall be entered in the log no later than thirty days from activity completion.

#### **G5. General Recordkeeping Requirements**

A. The following recordkeeping requirements shall apply to this facility:

- 1) For monthly recordkeeping, all data, including the results of all calculations, must be entered into the log no later than thirty days from the end of the month for which the data is required.
- 2) For weekly recordkeeping, all data, including the results of all calculations, must be entered into the log no later than seven days from the end of the week for which the data is required.
- 3) For daily recordkeeping, all data, including the results of all calculations, must be entered into the log no later than seven days from the end of the day for which the data is required.
- 4) All maintenance activities required by **Condition G4** (including any ongoing maintenance that has not been completed) shall be entered in the maintenance log no later than thirty days following the start of the maintenance.

B. Logs and records specified in this permit shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative and shall be retained for a period of not less than five years unless otherwise noted. Logs and records contained in this permit are based on a recommended format. Any logs that have an alternative format may be utilized provided such logs contain the same or equivalent information that is required. Computer-generated logs are also acceptable.

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

#### **G6. Other State and Federal Regulations**

This source shall comply with all applicable state and federal air pollution regulations. This includes, but is not limited to, all applicable provisions of the Tennessee Air Pollution Control Comprehensive Rules and Regulations, federal regulations published under 40 CFR 61 and 40 CFR 63 for sources of hazardous air pollutants, and federal regulations published under 40 CFR 60, New Source Performance Standards.

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

#### **G7. Startup, Shutdown, and Malfunction Requirements**

A. The facility must take all reasonable measures to keep emissions to a minimum during source 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.

TAPCR 1200-03-20-.02(1)

- B. Monitoring Systems: Due allowance for failure to monitor shall be made during any period of monitoring system malfunction, provided that the source owner or operator shows, to the satisfaction of the Technical Secretary, that the malfunction was unavoidable and is being repaired as expeditiously as practicable, and that a log of all such malfunctions is being kept by the owner or operator, including the time the malfunction began, when it was detected, what was wrong, what was done to correct the malfunction, and when the malfunction was corrected. Failures that are caused by poor maintenance, careless operation or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.

TAPCR 1200-03-10-.02(e)

**G8. Excursions**

All excursions from indicated parameter limits or ranges shall be recorded in a permanent suitable format and retained at the source location for a period of not less than five years.

The record of excursions shall include, at a minimum, the time the excursion was discovered, the corrective action taken, and the time that the process was back within the normal operating range.

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

“Excursion” shall mean a departure from an indicator range established for monitoring, consistent with any averaging period specified for averaging the results of the monitoring.

**G9. Application and Agreement Letters**

This source shall operate in accordance with the terms of this permit, the information submitted in the approved permit application(s) referenced in **Condition G1** and any documented agreements made with the Technical Secretary, including the agreement letters dated January 22, 2019.

TAPCR 1200-03-09-.01(1)(d) and 1200-03-09-.02(6)

**G10. Permit Transference**

- A. This permit is not transferable from one air contaminant source to another air contaminant source or from one location to another location.

TAPCR 1200-03-09-.03(6)(b)

- B. In the event an ownership change occurs at this facility, written notification of the ownership change requesting a permit amendment must be submitted to the Technical Secretary (see address below) no later than thirty days after the change occurs. This notification must include an agreement to abide by the terms of the permit, Division 1200-03 and Division 0400-30 of the Tennessee Comprehensive Rules and Regulations, the Tennessee Air Quality Act, and any documented agreements made by the previous owner to the Technical Secretary.

Tennessee Dept. of Environment & Conservation  
Division of Air Pollution Control  
Permitting Program  
William R. Snodgrass TN Tower, 15<sup>th</sup> Floor

or Adobe Portable Document Format  
(PDF) Copy to:  
[Air.Pollution.Control@TN.gov](mailto:Air.Pollution.Control@TN.gov)

312 Rosa L. Parks Avenue  
Nashville, TN 37243

TAPCR 1200-03-09-.03(6)(a)

**G11. Permit Renewal Application Submittal**

The permittee shall apply for renewal of this permit not less than sixty days prior to the permit expiration date. The renewal application shall be delivered to the Division at the address listed in **Condition G10** or via email.

TAPCR 1200-03-09-.02(3)

**G12. Source Operation**

Operation of each air contaminant source shall be in accordance with the provisions and stipulations set forth in the operating permit, all provisions of the Tennessee Division of Air Pollution Control Comprehensive Rules and Regulations, and all provisions of the Tennessee Air Quality Act.

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

**G13. Fees**

This source shall comply with the requirements for payment of applicable annual emission fees to the Tennessee Division of Air Pollution Control based on the Administrative Fees Schedule detailed in TAPCR 1200-03-26 of the Tennessee Air Pollution Control Regulations.

TAPCR 1200-03-26-.02

**G14. Reserved**

**G15. Reserved**

**G16. Status of Previous Permits**

The issuance of this operating permit supersedes any previously issued permits for the sources contained in this permit.

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

**G17. Title V Opt Out**

The permittee has elected to opt-out of being issued a major source operating permit pursuant to Division Rule 1200-03-09-.02(11)(a). The permittee would be considered a major source because their “potential to emit” value(s) for volatile organic compounds (VOCs) was greater than 100 tons per year, for a single hazardous air pollutant (HAP) was greater than 10 tons per year, and for a combination of hazardous air pollutants (HAPs) was greater than 25 tons per year at the time of application. The permittee has agreed to be subject to limitations in order to be below the major source applicability thresholds for VOCs of 100 tons per year each, for a single HAP of 10 tons per year, and for a combination of HAPs of 25 tons per year.

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

**G18. Report Required**

Any noncompliance with any condition(s) of this permit set to restrain the “potential to emit” below the applicability thresholds of 1200-03-09-.02(11) of the Tennessee Air Pollution Control Regulations, shall be

reported in writing to the Technical Secretary within fifteen working days of such discovery. This notification, at a minimum, shall include the identification of the source(s), identification of the permit condition(s) violated and details of the non-compliance (violation).

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

**G19. Federally Enforceable Limit**

The Permittee is placed on notice that **Condition G3** of this permit contains limitations that allow the Permittee to opt out of the major source operating permit program requirements specified in TAPCR 1200-03-09-.02(11). Failure to abide by these limits will not only subject the Permittee to enforcement action by the State of Tennessee, but it may also result in the imposition of Federal enforcement action by the United States Environmental Protection Agency and the loss of being Federally recognized as a conditional major source.

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

**G20. Fuel Usage Restriction**

Only Natural gas shall be used as fuel for sources at this facility.

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

**Compliance Method:** Included with the requirement.

**G21. Content Procedures and Analyses**

The volatile matter content, water content, density, volume solids, and weight solids of surface coatings shall be determined by either EPA Method 24 or Method 24A.

The volatile matter content and density of printing inks and related coatings shall be determined by EPA Method 24A

TAPCR 1200-03-16-.01(5)(g)(24)

**G22. Records of Purchase Orders**

Purchase orders and/or invoices or records of purchase orders and/or invoices for all volatile organic compound (VOC) and/or hazardous air pollutant (HAP) containing materials along with information or logs thereof containing VOC content, solids content, and HAP content (such as safety data sheets, certifications, technical data sheets, or laboratory analyses) must be maintained and kept available for inspection by the Technical Secretary or his/her representative. These records must be retained for a period of not less than five years. If new materials are used, or if material formulation is changed, the compilation of material information maintained shall be updated within 90 days from the initial date of usage of the new or altered material.

TAPCR 1200-03-10

**G23. VOC/HAP Content of Materials**

The as-supplied VOC/HAP content of all VOC-containing materials to be used by this source shall be determined as follows:

All Coatings, Inks, Adhesives, Thinners, and Solvents - from Safety Data Sheets (SDS) or manufacturer or vendor formulation data which explicitly list the VOC content by weight.

The results of these determinations shall be compiled in the following tabular format or an alternative format which readily provides the same required information. This table, along with SDS or other supporting documentation for each material used, shall be maintained at the source location and made available for inspection by the Technical Secretary or a Division representative upon permit issuance. If new materials are used, or if material formulation is changed, the table shall be updated within 90 days from the initial date of usage of the new or altered material.

Process Material Description	Material Density (lb/gal)	VOC Content (lb/gal)	HAP <sub>t</sub> Content (lb/gal)	Comments
Material #1				
Material #2				
etc.				

Note: t = total combined HAPs

The data may be obtained by laboratory analysis or from manufacturing or vendor certification stating the VOC content was determined by EPA Method 24. When more than 50 inks are used annually, a representative sampling of inks may be analyzed by Method 24. The representative sampling shall include inks which at a minimum represents 90 percent (%) of the volume of the inks utilized at this source. The permittee shall indicate when a representative sampling is used. The representative sampling procedure which is acceptable to the Division of Air Pollution Control is stipulated in the December 29, 1997, letter to the Division from International Playing Card & Label (IPC&L) (previous owner) and approved by the Division in letter dated January 6, 1998.

Tenn. Comp. R. & Regs. 1200-03-10-.02(2)(a)

#### **G24. Conditional Major Annual Report**

A report certifying the compliance status of this facility with **Condition G3** shall be submitted by March 31 of every year. This report shall cover the preceding calendar year and shall include the records required by **Condition S1-10 and Condition E4-9** of permit number 572143. A hard copy or electronic copy (PDF) of this report shall be submitted to the Environmental Field Office at one of the following addresses:

Hard Copy to:

Johnson City Environmental Field Office  
Tennessee Division of Air Pollution Control  
2305 Silverdale Road  
Johnson City, TN 37601-2162

Adobe Portable Document Format (PDF) Copy to:

APC.JCEFO@tn.gov

#### **G25. Title V Reporting Requirements**

##### **Semiannual reports.**

The final report for Title V operating permit number 572143 is due within sixty (60) days after the issuance of this of Conditional Major operating permit. The final report shall cover the period from July 1 to the issuance date of this Conditional Major operating permit.

These semiannual reports shall include:

- (1) Any monitoring and recordkeeping required by **conditions E3-2, E3-3, E3-5, E4-8, E4-9, E4-11, and E5-2** 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 **E3-8** 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. If no deviations occur, a statement that no deviations occurred during the specific period.
- (4) The day(s) that the source(s) does not operate shall be noted in the recordkeeping section for each source.

**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)

**Annual compliance certification.**

The final report for Title V operating permit number 572143 is due within sixty (60) days after the issuance of this of Conditional Major operating permit. The final report shall cover the period from July 1 to the issuance date of this Conditional Major operating permit.

The permittee shall submit annually compliance certifications with the terms and conditions contained in Sections A, B, D and E of Title V operating permit number 572143, 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 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 E2(b)2 of Title V operating permit number 572143. 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.

These certifications shall be submitted to: **Tennessee Division of Air Pollution Control TN APCD and EPA at the following addresses:**

The Technical Secretary  
Division of Air Pollution Control  
Johnson City Environmental Field Office  
2305 Silverdale Road  
Johnson City, TN 37601-2162

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

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

In lieu of submitting a paper copy to the above address for the Johnson City Field Office, an electronic copy (PDF) can also be submitted to the following email address:

APC.JCEFO@tn.gov

Source Specific Conditions for this facility are as follows, unless otherwise noted.

Source 01: **Rotogravure Printing Process:** This source consists of 3 Rotogravure Printing Presses (#28, #29, and #30), 1 ink holding tank, a cleaning operation (floor and printing press cleaning) subject to NSPS (Subpart QQ) and NESHAP (Subpart KK). This source is controlled by 2 Regenerative Thermal Oxidizers (RTO) operating in parallel. Mundet will be allowed to operate one RTO while operating Printing Presses (#28, #29, and #30). Scenarios 1 and 2 will remain the same with the exception that Mundet will be allowed to operate one RTO either in scenario 1 or scenario 2

Conditions S2-1 – S2-12 apply to the Rotogravure Printing Process

**S1-1. Reserved**

**S1-2. Reserved**

**S1-3. Reserved**

**S1-4. Emission Limitations**

- A. Particulate matter (PM) emitted from this source shall not exceed 1.36 pounds per hour (lb/hr) on a 24-hour averaging basis and 6.0 tons during all intervals of 12 consecutive months.

TAPCR 1200-03-07-.01(5), permit application dated November 23, 2009, and permit 960151P

**Compliance Method:** Compliance with this requirement shall be demonstrated by compliance with **Conditions G20** and **AP- 42** emission factor (7.6 lbs/10<sup>6</sup> scf of natural gas) Table 1.4-2.

- B. Carbon monoxide (CO) emitted from this source shall not exceed 1.76 pounds per hour (lb/hr) on a 24-hour averaging basis and 7.7 tons during all intervals of 12 consecutive months.

TAPCR 1200-03-07-.07(2) and permit application dated November 23, 2009

**Compliance Method:** Compliance with this requirement shall be demonstrated by compliance with **Conditions G20** and **AP- 42** emission factor (84.0 lbs/10<sup>6</sup> scf of natural gas) Table 1.4-1.

- C. Nitrogen Oxides (NO<sub>x</sub>) emitted from this source shall not exceed 1.62 pounds per hour (lb/hr) on a 24-hour averaging basis and 7.0 tons during all intervals of 12 consecutive months.

TAPCR 1200-03-07-.07(2) and permit application dated November 23, 2009

**Compliance Method:** Compliance with this requirement shall be demonstrated by compliance with **Conditions G20** and **AP- 42** emission factor (100.0 lbs/10<sup>6</sup> scf of natural gas) Table 1.4-1.

- D. Sulfur dioxide (SO<sub>2</sub>) emitted from this source shall not exceed 0.22 pounds per hour (lb/hr) on a 24-hour averaging basis and 1.0 tons during all intervals of 12 consecutive months.

TAPCR 1200-03-07-.07(2), permit application dated November 23, 2009, and permit 960151P

**Compliance Method:** Compliance with this requirement shall be demonstrated by compliance with **Conditions G20 and AP- 42** emission factor (0.6 lbs/10<sup>6</sup> scf of natural gas) Table 1.4-1.

**S1-5. Reserved**

**Source Specific NSPS Conditions**

**S1-6.** The owner or operator of this source shall comply with the requirements specified in 40 CFR §60.432, Subpart QQ – no owner or operator subject to the provision of subpart QQ shall cause to be discharged into the atmosphere from any affected facility VOC equal to more than 16 percent of the total mass of VOC solvent and water used at the facility during any one performance averaging period. The water used includes only that water contained in the waterborne raw inks and related coatings and the water added for dilution with waterborne ink system.

TAPCR 1200-03-09-.03(8) and 40 CFR 60.432

**Compliance Method:** Compliance with this requirement shall be demonstrated by the record keeping requirements provided in **Conditions G23 and S1-10**.

**Source Specific NESHAP Conditions**

**S1-7.** In accordance with 40 CFR Part 63 Section 63.820(a)(7) of Subpart KK, a facility can become an area source subject only to the provisions of paragraphs 40 CFR §63.829(d) and §63.830(b)(1) of the aforementioned subpart KK by limiting its potential emissions through appropriate mechanisms that may be available through the regulatory authority. Therefore, by imposing permit conditions to restrict the facility's potential and actual emission quantities of HAP, including materials used for source categories or purposes other than printing and publishing, to quantities below the major source threshold of 10 tons of a single HAP and/or 25 tons of a combination of HAP, the requirements of this subpart with the exception of paragraphs 40 CFR §63.829(d) and §63.830(b)(1) of the aforementioned subpart KK are not applicable. The maximum emission rate from the entire plant for any single HAP listed pursuant to Section 112(b) of the Federal Clean Air Act, shall be less than ten (10) tons per year. Total emissions of all HAPs from the entire plant, including this source, shall be less than twenty-five tons per year.

In the event that the emissions from this plant are ten (10) tons per year or more for any single HAP, or twenty-five (25) tons per year or more for total HAPs, the permittee shall provide written notification of the exceedance(s) to the Technical Secretary within fifteen (15) days from the date of discovery.

TAPCR 1200-03-09-.03(8) and 40 CFR 63.820(a)(7)

**Compliance Method:** Compliance with this requirement shall be demonstrated by the record keeping requirements provided in **Conditions G23 and S1-10**.

TAPCR 1200-03-09-.03(8) and 40 CFR 63.820(a)(7)

**TAPCR Applicability Rules**

**S1-8.** The permittee shall comply with the applicable requirements of Rule 1200-03-18-.35 of the Tennessee Air Pollution Control Regulations (Volatile Organic Compounds – Graphic Arts Systems) as indicated below.

Applicable Rule	Requirement	Compliance Method – Applicable Permit Condition
1200-03-18-.35(5)(a)1.	Minimum destruction efficiency of 90% for control device.	<b>Condition S1-10 and S1-11</b>
1200-03-18-.35(5)(a)2.	Minimum VOC capture efficiency	<b>Condition S1-11</b>

Applicable Rule	Requirement	Compliance Method – Applicable Permit Condition
1200-03-18-.35(5)(b)1.	Operate capture system and control device at all times that the printing press is in operation	<b>Condition S1-12 and S1-11</b>
	Demonstrate compliance with this rule through the applicable coating analysis and capture system and control device efficiency test methods specified in chapter 18.	<b>Condition S1-11</b>
1200-03-18-.35(5)(b)2.	Equip the control device with the applicable monitoring equipment specified in chapter 18,	<b>Condition S1-10 and S1-11</b>
	Install, calibrate, operate, and maintain the monitoring equipment according vendor’s specifications at all times the control device is in use.	<b>Condition S1-10 and S1-11</b>
1200-03-18-.35(6)	The VOC content of each coating and ink and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in chapter 18 to establish the records required under Paragraph (7) of the rule.	<b>Conditions G22 and G23</b>
1200-03-18-.35(7)(d)	Any printing press complying by means of control devices shall comply with TAPCR 1200-03-18-.03(5).	<b>Conditions S1-11</b>
1200-03-18-.03(5)(a)	Perform a compliance test, as applicable, upon startup of a new line or operation, or upon changing the method of compliance for any existing line or operation from the use of complying coatings or inks or weighted averaging to control devices. Testing shall have been performed or shall be performed pursuant to the procedures specified and referenced in chapter 18. No later than 60 days after completion of the performance test, the permittee shall submit results of all tests and calculations necessary to demonstrate compliance.	<b>Condition S1-11</b>
1200-03-18-.03(5)(b)	Recordkeeping Requirements	<b>Conditions S1-11</b>
1200-03-18-.03(5)(c)	Notify the Technical Secretary of noncompliance within 30 calendar days of the occurrence.	<b>Condition S1-11</b>

TAPCR 1200-03-18-.35

**Compliance Method:** Included with the requirement.

### S1-9. Operating Scenarios

This source shall operate only in one of two operating scenarios. Scenario number 1 shall use the emissions control system without bypassing. Scenario number 2 allows press #30 to operate in bypass mode while using water-based coatings. All other presses (#28 and #29) must use the emissions control system without bypassing.

**Compliance Method:** Compliance with this condition shall be demonstrated by recordkeeping. The permittee shall clearly demonstrate, in a log with time and date, when the source is operating in scenario number 1, and therefore requiring the use of the add-on control system. While operating under scenario number 2, only press #30 is allowed to bypass the control device(s), RTOs (Note: while operating under scenario number 2, press #30 uses water-based coatings (inks)). Consequently, it becomes unfeasible to exhaust emissions to the RTO due to low VOC concentrations. Therefore, press #30 emissions can bypass exhausting to the RTOs while operating under scenario number 2 only. Enclosure monitoring and associated PTE requirements are not applicable to press #30 when in operating scenario 2.

Except as provided in this condition, all other permit conditions remain effective including limitations, monitoring requirements, operating requirements, and recordkeeping requirements, as referenced in this permit.

Mundet will be allowed to operate one RTO while running presses (#28, #29, and #30). Scenarios numbers 1 and 2 will remain the same with the exception that Mundet will be allowed to operate one RTO either in scenario 1 or scenario 2.

TAPCR 1200-03-09-.03(8) and 1200-03-09-.02(6)

**S1-10. VOC and HAP Emissions Calculations**

The permittee shall calculate the actual quantities of HAP(s) and VOC emitted from this source during each calendar month within thirty days after the end of the month and maintain records of these emissions in a permanent form that readily shows compliance with **Condition G3** of this permit. (See example below) This log must be maintained and kept available at this source location and kept available for inspection by the Technical Secretary’s representative. VOC emitted from this source shall be determined using the VOC usage/consumption rate obtained from the VOC usage record required and the overall VOC control efficiency specified in this condition.

$$W_{\text{voc, emitted}} = W_{\text{voc, used}} \times \left[ 1 - \frac{\eta_{\text{voc, overall}}}{100} \right]$$

Where:

$W_{\text{voc,used}}$  = Monthly VOC usage rate as described in this condition

$W_{\text{voc,emitted}}$  = VOC emitted from this source during any single month, ton/month;

$\eta_{\text{VOC, OVERALL}}$  = Overall VOC control efficiency for the VOC control system in weight percent

The VOC emission rate determined in this condition may be used to demonstrate compliance with **Condition G3** during any single month, provided that other permit conditions related to VOC content determination and/or documentation, VOC usage record, and VOC emission containment and control are met.

**MONTHLY VOC/HAP EMISSIONS LOG FOR SOURCE 37-0076-01** Log A: MONTH: \_\_\_\_\_ YEAR \_\_\_\_\_

MATERIAL NAME	USAGE (gallons per month (gpm) or lb/month)	VOC CONTENT (pounds VOC per gallon or lb <sub>VOC</sub> /lb <sub>INK</sub> )	$\eta_{\text{VOC, OVERALL}}$ (%)	VOC Emitted (tons VOC per month)	HAP <sub>1</sub> CONTENT (pounds HAP <sub>1</sub> per gallon or lb <sub>HAP</sub> /lb <sub>INK</sub> )	HAP <sub>1</sub> Emitted (tons HAP <sub>1</sub> per month)	HAP <sub>p</sub> CONTENT (pounds HAP <sub>p</sub> per gallon or lb <sub>HAP</sub> /lb <sub>INK</sub> )	HAP <sub>p</sub> Emitted (tons HAP <sub>p</sub> per month)	TOTAL HAP Emitted (tons HAP <sub>1</sub> through HAP <sub>p</sub> per month)
TOTAL				VOCE		HAP <sub>1</sub> E		HAP <sub>p</sub> E	THAPE

**YEARLY EMISSIONS LOG FOR SOURCE 37-0076-01:** Log B:

MONTH/ YEAR	VOC EMISSIONS (tons VOC per month)	*VOC EMISSIONS (tons VOC per 12-Con.Mons)	HAP <sub>1</sub> EMISSIONS (tons HAP <sub>1</sub> per month)	*HAP <sub>1</sub> EMISSIONS (tons HAP <sub>1</sub> per 12-Con.Mons)	HAP <sub>p</sub> EMISSIONS (tons HAP <sub>p</sub> per month)	*HAP <sub>p</sub> EMISSIONS (tons HAP <sub>p</sub> per 12-Con.Mons)	TOTAL HAP EMISSIONS (tons HAP <sub>1</sub> through HAP <sub>p</sub> per month)	TOTAL HAP EMISSIONS (tons HAP <sub>1</sub> through HAP <sub>p</sub> per 12-Con.Mons)
Month/year	VOCE	VOCE12	HAP <sub>1</sub> E	HAP <sub>1</sub> E12	HAP <sub>p</sub> E	HAP <sub>p</sub> E12	THAPE	THAPE12
Month/year	VOCE	VOCE12	HAP <sub>1</sub> E	HAP <sub>1</sub> E12	HAP <sub>p</sub> E	HAP <sub>p</sub> E12	THAPE	THAPE12
Month/year	VOCE	VOCE12	HAP <sub>1</sub> E	HAP <sub>1</sub> E12	HAP <sub>p</sub> E	HAP <sub>p</sub> E12	THAPE	THAPE12
Etc.	VOCE	VOCE12	HAP <sub>1</sub> E	HAP <sub>1</sub> E12	HAP <sub>p</sub> E	HAP <sub>p</sub> E12	THAPE	THAPE12

(\*) The Tons per any 12- Consecutive Months (12-Con. Mons.) 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, that is, 6 (2) represents 6 tons emitted in 2 months.

VOC and HAPs emissions from this source shall be calculated and maintained by keeping the logs addressed in this condition.

$$\text{Control device Removal efficiency} = \frac{\left( \text{Mass emission rate of VOC going to control device} - \text{Mass emission rate of VOC from control device exhaust} \right) \times 100 \%}{\text{Mass emission rate of VOC going to control device}}$$

Where:

- (1) Control device removal efficiency = DRE
- (2) Mass emission rate of VOC = Mass of VOC emissions as measured by Method 25A
- (3) Overall Control Efficiency = (1 - 0.0115) x DRE
- (4) 0.0115 represents VOC fraction retained on substrate based on historical data from previous compliance demonstration at the Rogersville, Tennessee facility (similar facility of same ownership at the time).

#### EQUATIONS FOR THE VOC/HAP EMISSIONS CALCULATIONS FOR SOURCE 37-0076-01:

- (1) VOCE = VOC emitted (tons per month) =  $\Sigma \text{Material}_i \text{ Usage (gpm)} \times \text{Material}_i \text{ VOC content (pounds per gallon)} \times (1 - \text{OCE}) / 2000 \text{ pounds/ton}$
  - (2) HAP<sub>1</sub>E = HAP<sub>1</sub> emitted (tons per month) =  $\Sigma \text{Material}_i \text{ Usage (gpm)} \times \text{HAP}_1 \text{ content (pounds per gallon)} \times (1 - \text{OCE}) / 2000 \text{ pounds/ton}$
  - (3) HAP<sub>p</sub>E = HAP<sub>p</sub> emitted (tons HAP<sub>p</sub> per month) =  $\Sigma \text{Material}_i \text{ Usage (gpm)} \times \text{HAP}_p \text{ content (pounds per gallon)} \times (1 - \text{OCE}) / 2000 \text{ pounds/ton}$
  - (4) THAPE = total tons per month of HAP Emissions =  $\Sigma \text{HAP}_1 \text{ through HAP}_p \text{ emitted (tons per month)}$
  - (5) VOCE12 = total tons per 12 months of VOC Emissions =  $\Sigma \text{VOC emitted during 12 consecutive months}$
  - (6) HAP<sub>1</sub>E12 = total tons per 12 months of HAP<sub>1</sub>E Emissions =  $\Sigma \text{HAP}_1 \text{E emitted during 12 consecutive months}$
  - (7) HAP<sub>p</sub>E12 = total tons per 12 months of HAP<sub>p</sub>E Emissions =  $\Sigma \text{HAP}_p \text{E emitted during 12 consecutive months}$
  - (8) THAPE12 = total tons per 12 months of HAP Emissions =  $\Sigma \text{HAP}_1 \text{ through HAP}_p \text{ emitted (tons per month)}$
  - (9) 12VOCE = total VOC (tons per month) emitted by source
  - (10) 12VOCE12 = total VOC (tons per 12 consecutive months) emitted by source
  - (11) 12THAP<sub>1</sub>E = total HAP<sub>1</sub>E (tons per month) emitted by source
  - (12) 12THAP<sub>1</sub>E12 = total HAP<sub>1</sub>E (tons per 12 consecutive months) emitted by source
  - (13) 12HAP<sub>p</sub>E = total HAP<sub>p</sub>E (tons per month) emitted by source
  - (14) 12HAP<sub>p</sub>E12 = total HAP<sub>p</sub>E (tons per 12 months) emitted by source
  - (15) 12THAPE = total HAP (tons per month) emitted by source
  - (16) 12THAPE12 = total HAP (tons per 12 months) emitted by source
- OCE = overall control efficiency of the control system for source 37-0076-01 (includes all presses and ancillary equipment).

Notes:

Except as provided in **Condition S1-9**, both VOC and HAP emissions are calculated with the use of air pollution control equipment. Except as provided in **Condition S1-9**, actual emissions represent emissions after controls are considered.

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

**Compliance Method:** Included with the requirement.

#### S1-11. Emission Control Device Requirements

The overall control efficiency for source 37-0076-01 for VOC emissions shall not be less than 90%. Routine maintenance, as required to maintain 90% VOCs destruction efficiency for this source, shall be performed on the RTOs. The capture efficiency of the central air handling system at this facility shall be maintained at 100% while operating any associated process. The enclosure for the central air handling system at this facility shall meet the criteria for PTE as specified in 40 CFR Part 51, Appendix M, Method 204. The permittee shall use an alarm to notify operators of a possible upset condition. Within one hour of the alarm, the owner or operator will complete a system evaluation to determine the cause for the alarm. If no anomalies are noted and if within one hour the readings return to levels below those levels indicated above, no other action is necessary. Otherwise, the upset condition will be classified as a malfunction of the control system.

TAPCR 1200-03-09-.03(8) and 1200-03-18-.35(5)(a)1

**Compliance Method:** Compliance with this condition shall be demonstrated by recordkeeping and use of air pollution control equipment. Recordkeeping requirements and pollution control equipment related operating parameters are outlined in (1), (2), (3) and (4) below.

Compliance with the overall control efficiency of not less than 90% is achieved by effective use of the capture efficiency of the central air handling system and the proper use of the pollution control equipment. The parameters established during the most current performance test (conducted April 2, 2019) shall be incorporated into this permit by reference.

Pursuant to Rule 1200-03-18-.03(5)(a) of the Air Pollution Control Regulations, the permittee shall determine a minimum operating temperature for each RTO during the performance test to demonstrate compliance with this condition. The performance test conducted April 2, 2019, establishes the minimum operating temperature of each RTO as 1,550 °F.

- (1) The owner or operator of this source shall record the following information each day for each printing line (printing press).
  - (a) A log of the operating time for the capture system and control device(s) while any printing line (printing press) is operational including makeup or make ready conditions;
  - (b) Information necessary for completion of Log A in **Condition S1-10**; and
  - (c) Information which includes control device monitoring data (i.e. thermocouple temperatures).
- (2) Routine maintenance, as required to maintain the 90% VOC destruction efficiency, shall be performed on the RTOs. Appropriate maintenance records shall be recorded in a suitable permanent form and kept available for inspection by the Technical Secretary's representative. Upon the malfunction/failure of any emission control device(s) serving this source, the operation of the process(es) served by the device(s) shall be regulated by Chapter 1200-03-20 of the Tennessee Air Pollution Control Regulations.
- (3) The permittee shall notify the Technical Secretary of an instance of noncompliance with the applicable requirements for control devices (i.e. operating an RTO 50°F below the average minimum operating temperature of 1,550 °F), including any period of operation during which the parameter boundaries established during the performance test are exceeded, within 30 calendar days following the occurrence.
- (4) In the event of any 3-hour block of time, during the printing process, in which the average combustion zone temperature in the RTO is more than 28°C (50°F) below the average combustion temperature of 1550 °F (the most recent emission test which demonstrated that the source was in compliance) shall be considered an excursion.

#### **S1-12 Operate with Control Device**

The Permittee shall not operate this source without the use of regenerative thermal oxidizer (RTO) control exempt as specified in **Condition S1-9**.

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

**Compliance Method:** Included with the requirement.

#### **S1-13 Emission reductions of NO<sub>x</sub> requirement**

NO<sub>x</sub> reductions from this source shall be achieved by the use of low-NO<sub>x</sub> burners for RTO #1, RTO #2.

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

**Compliance Method:** The permittee shall retain copies of the manufacturer or vendor specifications for each burner subject to this condition. These specifications shall be kept at the source location and shall be made available for inspection by the Technical Secretary or his/her representative. The permittee shall be considered in compliance with this condition if the specifications for each burner indicate that NO<sub>x</sub> emissions from fuel

combustion are no greater than 0.05 lb/MMBtu, when the burner operates at its design heat input capacity while burning natural gas. These specifications shall be retained for the life of the burner.

Source 02: **Wastepaper handling Operation:** This source includes a baler, cyclone, and a baghouse.

Conditions S2-1 – S2-4 apply to the Wastepaper handling Operation

### S2-1. Input Limitation(s)

The stated design material input rate for the Paper Trim Removal System is 1,600 pounds per hour on an hourly average basis. The Permittee shall apply for a new construction permit prior to any increase in this limitation.

TAPCR 1200-03-09-.01(1)(d) and the application(s) referenced in **Condition G1**.

**Compliance Method:** Compliance with this input rate shall be demonstrated by keeping records of the weight of baled paper in pounds divided by the number of hours operated. This log must be maintained at the source location and kept available for inspection by the Technical Secretary or a Division representative. This log must be retained for a period of not less than five years. An example log has been provided below.

**DAILY INPUT LOG FOR SOURCE 37-0076-02:** Log C: Month: \_\_\_\_\_ Year: \_\_\_\_\_

Day	Input (pounds)	Process Rate* (lbs/hr)	Hour Operated	Comments
Example: 2/7/2020	33,600 lbs	1,400		

\* The process rate is determined by pound of material baled each day divided by hours of operation.

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

### S2-2. Reserved

### S2-3. Reserved

### S2-4. Emission Limitations

Total particulate matter (PM) emitted from this source shall not exceed 2.20 lbs/hr and 9.60 tons per year.

TAPCR 1200-03-07-.01(5) and the agreement letter dated October 23, 2007 (Attachment 1)

**Compliance Method:** Compliance with the PM limitation shall be demonstrated by proper maintenance of the control system. A monthly log of inspection and maintenance shall indicate what maintenance and repair activity was done, when it was done, and when problems were rectified, showing time and date. This information shall include, but is not limited to, baghouse inspections and repairs. A log of the operation hours when this process is operating without the control system fully operating must be kept. The days when the source does not operate shall be noted. These logs shall be retained in accordance with **Condition G5**.

The Permittee shall install and begin taking daily pressure differential readings on the baghouse controlling this source in no more than 60 days after the issuance of this permit. Thirty days of pressure differential (inches of water column) readings for the baghouse shall be compiled. The designated person(s) shall note any relevant baghouse conditions/problems/concerns when recording the values. This data shall be submitted to the Division, along with a proposed minimum pressure differential (MPD) for the baghouse, no later than 15 days following

the 30 days of readings. The Division-approved MPD value for compliance demonstration will be incorporated into this permit through a conditional major operating permit amendment.

The Permittee shall measure the pressure differential across the baghouse once daily while the source is in operation and record the results in a log. The days when the source does not operate shall be noted. Compliance with the PM emission limits will be demonstrated by maintaining a minimum pressure differential (MPD) across the baghouse. If the pressure differential across the baghouse is measured to be less than the required minimum acceptable value, then relevant comments and any actions taken shall be noted by the recorder in the daily log. In the event that the bags in the baghouse are replaced simultaneously, the Permittee shall record the date that the replacement is made.

Due allowance will be made for pressure differential readings that are less than the required minimum acceptable value which follow replacement of filters provided the permittee establishes to the satisfaction of the Technical Secretary that the readings resulted from the replacement of filters. All data must be entered in a log no later than seven (7) days from the day for which the data is required and shall be maintained at the source location. This log shall be kept available for inspection by the Technical Secretary's representative and must be retained for a period of not less than five (5) years.

TACPR 1200-03-10-.02

(end of conditions)

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The division data base gives the location of this source as 36.473889 latitude; -82.817500 longitude.



January 22, 2019

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

Email report notification: [air.pollution.control@tn.gov](mailto:air.pollution.control@tn.gov)

RE: Mundet, Tennessee Inc.  
Emission source 37-0076  
Conditional major permit  
Air permit application

To Whom It May Concern,

Mundet Tennessee Inc. ("Mundet") located in Surgoinsville, TN is providing notification to the Division of Air Pollution Control ("Division") in regards to Title V operating permit #572143. issued to the facility. Mundet resides at 170 Geiger Road in Surgoinsville, TN.

Attached to this cover letter is the completed air permit application requesting the surrender of the Title V permit listed above. Mundet is also requesting as part of this application a conditional major operating permit be issued to the facility.

Below are the current permit emissions for the facility:

Source	Single HAP Emission Limit	Total HAP Emission Limit	Total VOC Emission Limit	Total PM Emission Limit
	(tpy)	(tpy)	(tpy)	(tpy)
37-0076-01	10.0	25.0	199.0	6.0
37-0076-02	NA	NA	NA	9.6

Mundet requests that the following conditions be issued to the facility:

Mundet Tennessee Inc. / 170 Geiger Rd, Surgoinsville / TN 37873 USA  
T +1 423 601-7200 / F +1 423 601-7236 / mundet@delfortgroup.com / www.delfortgroup.com  
Federal ID #20-5408075



Source	Single HAP Emission Limit	Total HAP Emission Limit	Total VOC Emission Limit	Total PM Emission Limit
	(tpy)	(tpy)	(tpy)	(tpy)
37-0076-01	9.9	24.9	95.0	6.0
37-0076-02	NA	NA	NA	9.6

The current emissions at the facility are 0.0 tpy HAPs and 27.0 tpy of VOCs. These are well below the permitted limits as indicated above.

Based on the proposed actions listed above and included with this cover letter, Mundet would also like to terminate the Compliance Assurance Monitoring (CAM) plan in regards to the operation of the press rooms. The facility, by design, has a negative pull in order for the RTOs to operate. Mundet would agree to an annual verification of air balancing of the facility.

Please review this information and the information contained in the attached submittal. If additional information is required, please contact me at 423-601-7200 or Michael Fox at 423-956-2900.

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

Sincerely,

A handwritten signature in black ink, appearing to read "Craig Walter", with a long horizontal line extending to the right.

Craig Walter  
Facility Manager  
Mundet, Tennessee Inc.

Cc: File Copy

Attachments

Mundet Tennessee Inc. / 170 Geiger Rd, Surgoinsville / TN 37873 USA  
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Federal ID #20-5408075



May 5, 2020

Mr. Eric King  
State of 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

Email correspondence: [air.pollution.control@tn.gov](mailto:air.pollution.control@tn.gov)

**RE: Mundet Tennessee, Inc.  
Emission Source 37-0076  
Title V Air Permit Number 572143(AA)  
Conditional Major Air Permit Application  
Insignificant sources air emissions**

Dear Mr. King:

Mundet Tennessee, Inc. (“Mundet”) located in Surgoinsville, TN is providing additional information to the Division of Air Pollution Control (“Division”) about the facility proposed conditional major operating permit request that was submitted in January 2019.

Mundet would like to address other areas of operation for the conditional major air application. These areas are:

Mundet completed potential to emit calculations for VOC emissions from exempt and insignificant sources around the facility. According to TAPCR 1200-03-09-.02(11)(a) the following applies:

**“VOC emissions from exempt and insignificant sources at this facility, including aerosol-can spraying, storage tanks, small boilers, space heaters, gas-fired water heaters, etc. are estimated to be less than 9.14 tons per year under maximum operating conditions.”**

**In order to avoid the necessity of keeping emission records, the total plant-wide VOC emissions from these exempt and insignificant sources will be estimated as 9.14 tons per 12-consecutive month periods. This estimate is based on the permittee’s letter/correspondence dated May 4, 2020.**

Mundet Tennessee Inc. / 170 Geiger Rd, Surgoinsville / TN 37873 USA  
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Federal ID #20-5408075

Attachment 1  
Agreement Letters

Mundet agrees to the conditions of TAPCR 1200-03-09-.02(11)(a) for a condition in the conditional major air permit requirements.

Mundet believes that the aforementioned information included in this cover letter suffices the additional requirements needed by the Division to issue the conditional major air permit for emission source 37-0076.

*I, Carol Rod, am the responsible official of the Mundet Tennessee, Inc. facility located in Surgoinsville, TN. I certify under penalty of law that this document was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

If you have any questions or require additional information, please contact Roger Calloway at 423-601-7143 or Michael Fox at 423-956-2900.

Sincerely,



Carol Rod  
General Manager  
Mundet Tennessee, Inc.  
170 Geiger Road  
Surgoinsville, TN 37873

cc: File Copy



## MUNDET TENNESSEE, INC.

170 Geiger Road  
Surgoinsville, TN 37873  
Phone: (423) 601-7200  
Fax: (423) 601-7236

October 23, 2007

Mr. Barry Stephens  
Department of Environment & Conservation  
Division of Air Pollution Control  
9<sup>th</sup> Floor, L & C Annex  
401 Church Street  
Nashville, TN 37243-1531

Re: **Request for Minor Permit Modification**  
**Mundet Tennessee, Incorporated**  
**Facility Reference No. 37-0076**

OCT 24 2007

37-0076  
53946 | 3215

Dear Mr. Stephens:

As a follow-up to discussions with Mr. Doug Warden, please find enclosed a permit application requesting a minor modification to the existing Title V permit at Mundet Tennessee Incorporated (MTI) in Surgoinsville, Tennessee.

Currently Mundet has permitted (Source 02) a waste paper baler system which includes a Selco Model HSO-107AZ0 baler with a cyclone separator used to remove the paper from transport air in the pneumatic conveying system. The emissions from the cyclone separator are currently discharged outside the plant with a current allowable particulate matter (PM) emission rate, based on Table 2 of 1200-3-7-.03, of 3.13 pounds per hour based on a process rate of 1600 pounds per hour feed into the baler.

The proposed modification would be that addition of new waste handling system including new fans and transport lines, an additional baler and a cartridge filter that would control potential emissions from both the existing cyclone exhaust and emissions associated with the new baler. The discharge from the cartridge filter (baghouse) would be discharged back into the plant. The new baler (American Baler Model No. 5029-CTA960) is actually the old baler that was once used at the IPC&L facility in Rogersville, Tennessee. Included in the application is a flow schematic of the balers and control device arrangement.

Although during any hourly period, the hourly material feed rate to the balers could increase over the current process feed rate, the total material handling rate would not increase above the current allowable of 1600 pounds per hour.

A/E for  
PM standard

Uncontrolled PM emission rates for this operation are unknown; however, actual discharge from the filter, based on engineering estimate will be less than 0.005 grains per dry standard cubic feet. At a maximum flow rate of 7200 SCFM, this would equate to an emission rate of 0.31 pounds per hour or 1.4 tons per year, assuming 8760 hours per year of operation. As previously stated, this discharge will be inside the plant, with only a portion of the dust being release outside the building through doorway openings. Due to the addition of the filter controls on the existing cyclone exit, this will result in a significant decrease in actual emissions from this source.

Therefore, due to the significant decrease in emissions, Mundet hereby agrees to limit the particulate matter (PM) emissions from Source 02 (Waste Paper Handling) to 2.2 pounds per hour and /or 9.6 tons per year.

Lastly, this letter also serves as the notification for the control device change for this source required by 1200-3-9-.02(7).

Based on information and belief formed after reasonable inquiry, the statements and information in this document and attachments are true, accurate, and complete.

Please let us know if you have any questions or need additional information.

Sincerely,  
**Mundet Tennessee Incorporated**

  
Mr. Ed Ginty  
Plant Manager

Enclosures

cc: Mr. Doug Warden, TDEC  
Mr. Michael H. Lee, Mundet  
Mr. Billy Nichols, URS