

PUBLIC NOTICE

Sonoco Products Company dba Sonoco Products Company – Newport has applied to the Division of Air Pollution Control for a significant modification to an existing major source operating permit subject to the provisions of paragraph 1200-03-09-.02(11) of the Tennessee Air Pollution Control Regulations. They seek to obtain a significant modification to a major source operating permit to add a new winding and coating operation for a tube manufacturing process. The existing Title V operating permit subject to the modification is identified as follows: Division identification number 15-0020/ 574123. The process emission source affected by this modification is identified as follows: 15-0020-08 condition E6-1 (SM1). This significant modification is conducted pursuant to subpart 1200-03-09-.02(11)(f)5(iv) of the Tennessee Air Pollution Control Regulations. Only the portions of the Title V permit affected by the significant modification are open to comment during the notice period.

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. 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. Whether EPA's 45-day review period is performed concurrently with the public comment period or after the public comment period has ended, the deadline for citizen's petitions to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended (*i.e.*, sequentially). 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:

Knoxville Environmental Field Office
3711 Middlebrook Pike
Knoxville TN 37921

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

Electronic copies of the draft permits are available by accessing the TDEC internet site located at:

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

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 6, 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 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.

For Cocke County "Newport Plain Talk"-- publish once on September 6, 2020

Air Pollution Control

DATE: September 1, 2020

Assigned to – Greg Forte

No alterations to the above are allowed:

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 Greg Forte, TN Division of Air Pollution Control, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue, 15th Floor, Nashville, TN 37243

SIGNIFICANT MODIFICATION #1 TO TITLE V PERMIT
STATEMENT
RENEWAL

Facility Name:	Sonoco Products Company dba Sonoco Products Company-Newport
City:	Newport
County:	Cocke

Date Application Received:	May 17, 2018
Date Appl. Deemed Complete:	May 17, 2018

Emission Source Reference No.:	15-0020
Permit No.:	574123
T5 Renewal Issued Date:	August 29, 2019

INTRODUCTION

This narrative is being provided to assist the reader in understanding the content of the attached Title V operating permit. This Title V Permit Statement is written pursuant to TAPCR 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 **Sonoco Products Company** and to provide practical methods for determining 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.** **Sonoco** is a manufacturer of paperboard, consisting of tubes produced from 100% recycled paper.
- 01:** Boilers #1 & #2 (Natural Gas, #2 Fuel Oil) and One Auxiliary Boiler
 - 05:** Two Cylinder Paperboard Machines
 - 08:** Tube Manufacturing

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** (this means that the facility is not located within a national park or national wilderness area; see 40 CFR 52.21(e) for complete definition).

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 source's status with respect to the Title V Program? (Major/Minor)
PM	YES	Minor
PM ₁₀	YES	Minor
SO ₂	YES	Major
VOC	YES	Major
NO _x	YES	Minor
CO	YES	Minor
GHG	YES	Minor
Individual HAP	YES	Minor
Total HAPs	YES	Minor

3. **MACT Standards.** This source *is not* major for HAPs. This source *is* subject to a GACT Standard 40 CFR part 63 Subpart JJJJJJ.

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

PSD (*no*)

NESHAP (*yes*)

NSPS (*yes*)

II. Compliance Information.

A. Compliance Status. Is the source currently in compliance with all applicable requirements? (*yes*)
Are there any applicable requirements that will become effective during the permit term? (*no*)

III. Other Requirements.

A. Emissions Trading. The source is not involved in any emission trading program.

B. Acid Rain Requirements. This source 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.

A. Notification of this draft permit was emailed (currier delivered to depository) to the following environmental agencies:

1. U.S. EPA
2. North Carolina Department of Environment and Natural Resources

3. Cherokee Nation
4. Kentucky Department of Environmental Protection
5. Virginia Department of Environmental Quality
6. Knox County Department of Air Pollution Control

V. Permitting Activities Issued Since Original Permit issuance (previous Permit 548593):

Significant Modification – Issued February 14, 2002 – Installed boilers 1 and 2

Operational Modification 1 Change – Letter dated June 17, 2002- Installed temporary boiler while replacing two existing boilers.

Operational Modification 2 Change – Letter dated November 22, 2002 – Company requests to extend time for using temporary boiler to December 2003.

VII. Permitting Activities Issued Since Permit 558854 issuance:

None.

VIII. Permitting Activities Issued Since Permit 567288 issuance:

None.

IX. Facility Total Annual Emissions (tons/yr) Listed in Permit 574123:

Source No.	PM	ALLOWABLE (except HAPs) Pollutant (tons per year)					
		NOx	VOC ⁵	HAP ¹	CO	SO ₂	
01	15	73	1.85		17	241.4	
05			84.0				
Total	15	73	85.85		17	241.4	

X. Public Participation Important Dates:

EPA concurrent review requested	<u>July 22, 2019</u>
Public Notice publication date	<u>July 20, 2019</u>
Public Notice period completion date	<u>August 20, 2019</u>
Public Notice publication comments	<u>None</u>
EPA Notification date	<u>December 23, 2016</u>
EPA review period completion date	<u>September 4, 2019</u>
EPA review comments	<u>July 30, 2019-(not targeted)</u>
Permit Registry Notification date	<u>NA</u>

XI. Significant Modification 1

This modification is for the purpose of adding a new Tube Manufacturing Process (15-0020-08) to the Title V permit. This process has already been permitted under construction permit 978064.

This process will increase allowable VOC emissions by 35 tons, making this source major for VOC (it is already major for SO2).

XII. Changes to 574123 occurring with Significant Modification #1

B6 (SM1)– change of address

E1(SM1) was updated to incorporate modified in accordance with the new standard text including the new APC 36 Fee Selection form at Attachment 5 . Also new emissions are included in the fee table

E2(SM1) was updated in accordance with the new condition, and also the requirement to report on condition E4-9 on the previous permit was removed because this condition only concerned fees, not compliance

E2-1(SM1) was updated with new Company staff names and also recognizes Gail Saul as an authorized representative for environmental-related activities.

E3-1 (SM1) modifies the numbering system

E3-2(SM1) was modified by adding a compliance method

E3-3(SM1) was updated to include the new recordkeeping condition, and the previous E3-4 is included in the new E3-3.

E3-4(SM1) is the new standard Routine Maintenance requirement

E3-5(SM1) is modified to include a compliance requirement.

E3-6(SM1) is modified to include a compliance requirement.

E3-7(SM1) is modified to add records to verify that the facility will not become major HAPs.

E4-2(SM1) is modified to clarify “any consecutive 12-month period”

E4-3(SM1) is modified to add the TAPCR reference

E4-4(SM1) is modified to add the TAPCR reference and a compliance method

E4-9(SM1) is modified to clarify “any consecutive 12-month period”

E4-10 (SM1) is modified to add the TAPCR reference and specify the legal basis for the incorporation of Subpart JJJJJJ.

E4-12(SM1) through E4-17(SM1) were modified to include compliance requirements

E5-1(SM1) is modified to clarify “any consecutive 12-month period”

E6-1(SM1) is added to specify requirements for the new Tube Manufacturing and Coating Operation as already permitted under Construction Permit 978064.

Attachment 5 is added as the new APC 36 Fee Selection form

There was some question as to the appropriate plant personnel that should be designated as the Responsible Official for the facility, as there were separate staff that were responsible for different parts of the plant. After consultation with APC staff, the company decided that a Vice President in upper management would sign a statement authorizing three individuals at the plant site as signatories. This statement, dated August 13, 2020 signed by James Harrell, Vice President Americas Industrial, authorizes Shawn McIntosh, current plant manager for the paper facility, Gail Saul, current plant manager for the Tube and Core facility, and Michael Steele, Current Corporate Environmental Services personnel, as authorized signatories for the plant.

Also, a new APC Index form dated 8/14/2020 was submitted designating Gail Saul, Plant Manager as responsible Official for this permitting action.

XIII

Allowable / Potential Emissions, tons per year

Source	PM	SO2	CO	VOC	NOx	HAP- methanol *	HAP- general including methanol
01 and 02 Boilers	15.0	241.4	44.6	2.92	73.0	-0-	1.2 (estimated PM and VOC HAP from AP-42 combined)
05 Two Paperboard Machines	--	--	--	84.0	--	2.96 methanol (calculated from emission	2.96 (no factors for HAP except methanol)

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



**SIGNIFICANT MODIFICATION #1 to
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: August 29, 2019

Date of Significant Modification: TBD

Date Expires: February 1, 2024

Permit Number:

574123

Issued To:

Sonoco Products Company

dba Sonoco Products Company – Newport

Installation Address:

766 Industrial Road

Newport

Installation Description:

Paperboard Manufacturing -

01: One (1) Boiler 60.61 MM BTU per hour

02: One (1) Boiler 60.61 MM BTU per hour

05: Recycled Paperboard Manufacturing process

08 Tube Manufacturing and Coating

NSPS Subpart Dc

NESHAP JJJJJ

Facility ID: 15-0020

Renewal Application Due Date:

Between May 7, 2023 and August 5, 2023

Primary SIC: 26

Information Relied Upon:

Title V Permit Renewal Application Dated May 21, 2018

Significant Modification Application dated December 18, 2019

And Revision dated August 14, 2020

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 4	Applicability of General Provisions to Subpart JJJJJ	2 pages
ATTACHMENT 5	Fee Selection Form APC 36	2 pages

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 (20) percent for an aggregate of more than five (5) minutes in any one (1) hour or more than twenty (20) minutes in any twenty-four (24) 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 (20) percent (6-minute average) except for one six minute period per one (1) hour of not more than forty (40) 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

15-0020 Facility Description: Sonoco is a manufacturer of paperboard, consisting of tubes produced from 100% recycled paper.

Conditions E1 through E3 apply to all sources in the facility unless otherwise noted.

E1(SM1). Fee payment

FEE EMISSIONS SUMMARY TABLE FOR MAJOR SOURCE 15-0020

REGULATED POLLUTANTS	ALLOWABLE EMISSIONS (tons per AAP)	ACTUAL EMISSIONS (tons per AAP)	COMMENTS
PARTICULATE MATTER (PM)	15.0	AEAR	Includes or does not include all fee emissions.
PM₁₀	N/A	N/A	
SO₂	241.4	AEAR	Includes or does not include all fee emissions.
VOC	121.92	AEAR	Includes or does not include all fee emissions.
NO_x	73.0	AEAR	Includes or does not include all fee emissions.
CATEGORY OF MISCELLANEOUS HAZARDOUS AIR POLLUTANTS (HAPs WITHOUT A STANDARD)*			
VOC FAMILY GROUP	121.92	AEAR	Fee emissions are included in VOC above.
NON-VOC GASEOUS GROUP		N/A	
PM FAMILY GROUP		N/A	
CATEGORY OF SPECIFIC HAZARDOUS AIR POLLUTANTS (HAPs WITH A STANDARD)**			
VOC FAMILY GROUP		N/A	
NON-VOC GASEOUS GROUP		N/A	
PM FAMILY GROUP		N/A	
CATEGORY OF NSPS POLLUTANTS NOT LISTED ABOVE***			
EACH NSPS POLLUTANT NOT LISTED ABOVE		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 Significant **modification #1**

issuance **began July 1, 2020 and ends June 30, 2021**. The next Annual Accounting Period begins July 1, 2021 and ends **June 30, 2021** 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 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:

Actual Emissions Analyses 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

and

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(SM1). Reporting requirements.

- (a) **Semiannual reports.** Semiannual reports shall cover the six-month periods from April 1 to September 30 and October 1 to March 31 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.

These semiannual reports shall include:

- (1) Any monitoring and recordkeeping required by conditions **E3-7(SM1), E4-2(SM1), E5-1(SM1) and E6-1(SM1)** 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 **E3-1** 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 April 1 to March 31 and shall be submitted within 60 days after the end of each 12-month period.

These certifications shall be submitted to: TN APCD and EPA

Knoxville Field Office
3711 Middlebrook Pike
Knoxville, TN 37921

or

APC.KnoxEFO@TN.gov or

and Air Enforcement Branch

**US EPA Region IV
61 Forsyth Street, SW
Atlanta, Georgia 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)

(c) **NESHAP Reporting Requirements.** Annual compliance certifications required by 40 CFR 63, Subpart JJJJJ, are outlined in **Condition E4-17(b).**

(d) **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

E2-1(SM1). Identification of Responsible Official, Technical Contact, and Billing Contact of the permitted facility:

a) The application that was utilized in the preparation of this permit is dated **May 17, 2018**, and signed by Responsible Official **Shawn McIntosh**, Plant Manager of the permitted facility. The Significant Modification application that was utilized in the preparation of this permit is dated December 18, 2019, and signed by Responsible Official Gail Saul, Plant Manager of the permitted facility. A letter from James Harrell, Vice President, Americas Industrial, dated August 13, 2020 identifies company staff that are authorized as official representatives for environmental purposes for the Sonoco Products Company located in Newport, TN. Gail Saul, Plant Manager for the Tube and Core facility, Michael Steele, Current Corporate Environmental Services, and Shawn McIntosh, current plant manager for the paper facility are authorized as a representatives by this letter. An application dated August 14, 2020, identifies Gail Saul, Plant Manager, as the Responsible Official. If this person (Gail Saul) 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 TAPCR, 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 (30 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 17, 2018**, and identifies **Michael Steele**, 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 30 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 17, 2018**, and identifies **Lannette Hixson**, Billing Contact for the permitted facility. The Significant Modification application that was utilized in the preparation of this permit is dated December 18, 2019, and identifies Cindy Cripe as Billing Contact for the permitted facility. If this person (Cindy Cripe) 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 (30) days of the change. The notification shall include the name and title of the new Billing Contact and certification of truth and accuracy.

TAPCR1200-03-09-.02(6)

Compliance Method: Included with the requirement

E3. General requirements applicable to permitted facility.

E3-1. Visible emissions from all stacks at 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 **24** hour period. Visible emissions 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 1200-03-05-.01(1)

Compliance Method: Compliance with this opacity limitation shall be certified through utilization of the Division's Opacity Matrix dated June 18, 1996, amended September 11, 2013, using EPA Method 9 that is enclosed as Attachment 1.

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.

E3-2(SM1). Purchase orders and/or invoices or a record of purchase orders and/or invoices, along with material safety data sheets must be maintained and kept available for inspection by the Technical Secretary or representative. These records must be retained for a period not less than five years.

The as-supplied sulfur content of all sulfur-containing fuels used in Boilers #1, #2 and the auxiliary boiler may be determined by using manufacturer or vendor certification which explicitly lists the sulfur content by weight.

TAPCR 1200-03-10

Compliance Method: Compliance shall be demonstrated through maintenance and availability of records.

E3-3(SM1). 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 30 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 E3-4** (including any ongoing maintenance that has not been completed) shall be entered in the maintenance log no later than 30 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)

Compliance Method: Permittee shall comply with the above recordkeeping requirements

E3-4(SM1). Routine Maintenance Requirements

The permittee shall maintain and repair the emission source, 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 30 days following the start of the repair or maintenance activity, and the completion date shall be entered in the log no later than 30 days from activity completion.

E3-5(SM1). The permittee listed various insignificant and exempt activities in their Title V Application per Rule 1200-03-09-.04(5). 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.

TAPCR1200-03-09

Compliance Method: Permittee shall observe the required instructions in the event that new insignificant activities are installed.

E3-6(SM1). The permittee shall comply with all applicable federal regulations concerning the operations at this facility. This includes but federal regulations published under 40 CFR 61 and 40 CFR part 63 for sources of hazardous air pollutants, and federal regulations published under 40 CFR part 60, New source Performance Standards. This source shall operate in accordance with the terms of this permit and the information submitted in the approved permit application.

TAPCR1200-03-09-.03(8)

Compliance Method: This is a declaratory statement

E3-7(SM1). The permittee has stated that this facility is not a Major Source (as this term is defined TAPCR 1200-03-09-.02(11)(b)14.) for emissions of Hazardous Air Pollutants (HAPs) which have been listed pursuant to section 112(b) of the Federal Clean Air Act. Records shall be maintained to demonstrate that this facility has not exceeded an emission rate of 9.9 tons per consecutive 12-month period of any individual HAP or 24.9 tons per consecutive 12-month period for any combination of HAPs. The following records at Logs 1 and 2, or records in another format providing the same information, shall be used to demonstrate the plantwide monthly and 12-month emission levels for single and combined HAPs. The permittee shall notify the Division (either in writing or electronically) within 15 days after it has been determined that emissions of any single HAP have exceeded a level of 9.9 tons over any consecutive 12-month period, or if emissions of all combined HAPs have exceeded a level of 24.9 tons over any consecutive 12-month period.

Log 1 Monthly HAP Emissions

Source	Description	HAP1 Emissions Tons per Month	HAP2 Emissions Tons per Month	HAPn Emissions Tons per Month	Total HAP emissions per Month
01 and 02, combined	Two Boilers*				
05	Recycled Paperboard Manufacturing				
08	Tube Manufacturing				
Total HAP Emissions for Month					

* The permittee may propose maximum values for combustion emissions in order to avoid the necessity of maintaining records

HAP emissions from source 15-0020-05 shall be obtained from the records required by condition E5-1(SM-1) and HAP emissions from source 15-0020-08 shall be obtained from the records required by condition E6-1(SM-1)

Log 2 Plantwide HAP Emissions for 12 consecutive month periods*, Sources 15-0020-01 and 02, 05, and 08, Combined Total on a Monthly Basis

Month, year	HAP ₁ Emissions, Tons per Month	HAP ₂ Emissions, Tons per Month	HAP _n Emissions, Tons per Month	Total of all HAPs, tons per Month
Month 1				
Month 12				
Total for 12 Months*				

(*) The Tons per 12 Month value is the sum of the HAP emissions in the 11 months preceding the month just completed + the HAP emissions in the month just completed. If data is not available for the 11 months preceding the initial use of this Table, 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 [i.e., 6 (2) represents 6 tons emitted in 2 months]. This log is the total amount of HAPs emitted to the air on a 12 month consecutive basis.

Compliance Method: Maintenance of above records and notification of Air Pollution Control Division under conditions as specified above. This recordkeeping condition is established to verify that the facility is not a major source for HAPs.

TAPCR 1200-03-10-.04

15-0020-01 & 02	Source Description:	Boilers 01 & 02: Two power boilers using natural gas and No. 2 fuel oil as fuel. The two power boilers are rated at 60.61 MM Btu/hr heat input, each. These boilers are subject to NSPS rule 40 CFR Part 60 Subpart Dc. An auxiliary boiler not to exceed capacity 60.61 MM Btu/hr is used when one of the boilers is down for maintenance. This source is subject to National Emission Standard for Hazardous Air Pollutants (GACT) for Industrial , Commercial and Institutional Boiler area sources regulation 40 CFR part 63 Subpart JJJJJJ. The applicable requirements of 40 CFR 60 Subpart Dc and 40 CFR 63 Subpart JJJJJJ are incorporated into this permit pursuant to TAPCR1200-03-09-.03(8).
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Conditions E4-1 and E4-17 apply to source 15-0020-01.

E4-1. The total maximum heat input capacity for the two boilers shall not exceed **121.22** million Btu/hr. Should the permittee need to modify this source in a manner that increases the design heat input capacity, a permit modification shall first be obtained prior to making the change.

TAPCR 1200-03-09 and application dated **May 21, 2013**.

Compliance Method: The boiler manufacture specification documents should be retained as proof of the heat input capacity. These documents shall be kept readily available / accessible and made available upon request by the Technical Secretary or a Division representative.

E4-2(SM1). Total fuel oil usage for this source shall not exceed **6,800,000** gallons of No.2 fuel oil during all intervals of 12 consecutive months.

TAPCR 1200-03-09, 40 CFR §60.48c(g)(2), and application dated **May 21, 2013**.

Compliance Method: Compliance shall be assured by monthly and 12-month recordkeeping of fuel usage for each boiler in the following format at Logs 3 and 4 or a similar log which readily demonstrates compliance with the above limit.

Log 3 Monthly log

Date	Fuel Oil Usage			Natural Gas Usage		
	Boiler 1 No.2 Fuel Oil Usage (gallons per month)	Boiler 2 No.2 Fuel Oil Usage (gallons per month)	Auxiliary Boiler No.2 Fuel Oil Usage (gallons per month)	Boiler 1 Natural gas Usage (standard cubic feet (scf) per month)	Boiler 2 Natural gas Usage (standard cubic feet (scf) per month)	Auxiliary Boiler Natural gas Usage (standard cubic feet (scf) per month)
Total Fuel oil for the month:				Total natural gas usage for the month:		

Log 4 Yearly log

Month/year	No.2 Fuel Oil Usage (gallons) (For all three boilers)	Total No.2 Fuel Oil Usage (gallons) for any consecutive 12 month period

E4-3(SM1). Only two boilers shall operate simultaneously.

This limitation has been established pursuant to TAPCR 1200-03-09-.03(8).

Compliance Method: Compliance with this condition shall be assured by annual certification (Condition E2(b)) specifying the days each boiler was used.

E4-4(SM1). Only natural gas or No. 2 fuel oil shall be used as fuel for this source.

This limitation has been established pursuant to TAPCR 1200-03-09-.03(8).

Compliance Method: Compliance with this condition shall be assured by the Log in Condition E4-2.

E4-5. The sulfur content of the No. 2 oil used for these two boilers shall not exceed **0.5** percent by weight.

40 CFR §60.42c(d)

Compliance Method: The company shall obtain certification from the fuel supplier of the fuel sulfur content (by weight) for each shipment of fuel oil or alternately, the vendor may supply a statement to the effect that all No. 2 fuel oil will contain no more than 0.5% sulfur by weight

E4-6. Particulate matter (PM) emitted from this source shall not exceed **3.0** pounds per hour on a daily average basis and **15.0** tons per 12 consecutive months.

TAPCR 1200-03-06-.02(2)(a)

Compliance Method: Compliance with this emission limitation shall be assured by complying with Condition E4-2 and AP-42 emission factors of 7.6 pounds (lbs) of particulate matter per million standard cubic feet for natural gas and **2.0** pounds of particulate matter per **1000** gallons of fuel oil. (See **Attachments 2 and 3**)

E4-7. Sulfur Dioxide (SO₂) emissions from this source shall not exceed **241.4** tons per 12 consecutive months.

TAPCR 1200-03-14-.03(5)

Compliance Method: Compliance with this emission limitation shall be assured by complying with Conditions E4-2, E4-5 and AP-42 emission factors of **0.6** pounds (lbs) of sulfur dioxide per million standard cubic feet for natural gas and 142(S) pounds of sulfur dioxide, where S is the weight percent sulfur content of the fuel, per **1000** gallons of fuel oil.

E4-8. Nitrogen oxides (NO_x) emitted from this source shall not exceed **73.0** tons per 12 consecutive months.

TAPCR 1200-03-06-.03(2)

Compliance Method: Compliance with this emission limitation shall be assured by complying with Conditions E4-2 and AP-42 emission factors of 100 pounds (lbs) of nitrogen oxides per million standard cubic feet for natural gas and 20 pounds of nitrogen oxides per **1000** gallons of fuel oil. (See **Attachments 2 and 3**).

E4-9(SM1). For fee purposes, the permittee shall calculate the actual emissions of PM, SO₂, and NO_x for the current annual accounting period from the two boilers using the records in the following logs (Logs 5 and 6) or similar format. These records, along with supporting calculations, shall be submitted to the Technical Secretary for the actual emissions analysis requirement in condition E1.

Log 5 Monthly Log

Month

Monthly Fuel usage	PM emissions 7.6 lb/ 10 ⁶ scf for natural gas - 2 lb/10 ³ gallons of fuel oil	SO ₂ emissions 0.6 lb/10 ⁶ scf for natural gas - 142S lb/10 ³ gallons of fuel oil.	VOC emissions 11 lb/10 ⁶ scf natural gas - 0.252 lb/10 ³ gallons fuel oil	NO _x emissions 100 lb/10 ⁶ scf for natural gas - 20 lb/10 ³ gallons of fuel oil
Natural Gas Usage From condition E4-2				
#2 Fuel Oil Usage From condition E4-2				

Total				
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Log 6 12-consecutive month EMISSIONS LOG

PM Emissions (tons per month)	PM emissions (tons per any 12 consecutive month period)	SO2 emissions (tons per month)	SO2 emissions (tons per any 12 consecutive month period)	VOC emissions (tons per month)	VOC emissions (tons per any 12 consecutive month period)	NOx emissions (tons per month)	NOx emissions (tons per any 12 consecutive month period)

TAPCR 1200-03-26-.02(9)

E4-10 (SM1). This facility is considered an area source of HAP emissions. The oil fired boilers are considered existing affected sources for National Emission Standards for Hazardous Air Pollutant for Industrial, Commercial and Institutional Boiler Area Sources regulation 40 CFR part 63, Subpart JJJJJ. The permittee shall comply with all provisions of Subpart JJJJJ. The requirements of Subpart JJJJJ are incorporated under the provisions of TAPCR 1200-03-09-.03(8).

Compliance Method: Compliance with this condition shall be demonstrated by the provisions of Condition E4-17(SM1).

40 CFR §63.11194(a)(1) of Subpart JJJJJ and TAPCR 1200-03-09-.03(8).

E4-11. Reserved.

E4-12(SM1). The permittee must comply with each work practice standard, emission reduction measure, and management practice specified in Table 2 to 40 CFR part 63, Subpart JJJJJ that applies to your boiler. A facility that operates under an energy management program established through energy management systems compatible with ISO 50001, that includes the affected units, also satisfies the energy assessment requirement.

Existing oil-fired boilers with heat input capacity greater than **5.0 MMBtu/hr** that do not meet the definition of seasonal boiler or limited-use boiler, are required to conduct an initial tune-up as specified in 40 CFR § 63.11214, and conduct a tune-up of the boiler biennially as specified in 40 CFR § 63.11223.

40 CFR § 63.11201

The boiler must have a one-time energy assessment performed by a qualified energy assessor. The permittee shall comply with this condition no later than **March 21, 2014**. An energy assessment completed on or after **January 1, 2008**, that meets or is amended to meet the energy assessment requirements in this condition satisfies the energy assessment requirement. An energy assessment study that complies with this requirement was completed **January 16, 2013**. The energy assessment must include:

- (a) A visual inspection of the boiler system.
- (b) An evaluation of operating characteristics of the facility, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints,
- (c) Inventory of major systems consuming energy from affected boiler(s),
- (d) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage,
- (e) A list of major energy conservation measures,
- (f) A list of the energy savings potential of the energy conservation measures identified,

- (g) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments

40 CFR § 63.11201(b)

Compliance Method: the permittee shall maintain records of the above activities as required by Condition E4-17.

E4-13. General requirements

At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

40 CFR § 63.11205

Compliance Method: the permittee shall annually certify compliance under the provisions of **E2(SM1).(b)**

- E4-14. Initial compliance requirements:** Company states: Boilers 1 & 2 initial tune-ups on natural gas completed on 7/19/2011 and 7/20/2011, respectively. Energy assessment completed July 8, 2013.

Compliance Method: This is a declaratory statement

- E4-15. Initial compliance with the work practice standard, emission reduction measure, and management practice:** Company states: Boilers 1 & 2 initial tune-ups on fuel oil completed on 11/22/2011. Energy assessment completed July 8, 2013.

Compliance Method: This is a declaratory statement

E4-16. Demonstrate continuous compliance with the work practice and management practice standards

(a) For affected sources subject to the work practice standard or the management practices of a tune-up, you must conduct a performance tune-up according to paragraph (b) of this condition and keep records as required in 40 CFR § 63.11225(c) to demonstrate continuous compliance. You must conduct the tune-up while burning the type of fuel (or fuels in the case of boilers that routinely burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up.

(b) You must conduct a tune-up of the boiler biennially to demonstrate continuous compliance as specified in paragraphs(b)(1) through (7) of this condition. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.

(1) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection.

(2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.

(3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection.

(4) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.

(5) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.

(6) Maintain on-site and submit, if requested by the Technical Secretary, a report containing the information in paragraphs (b)(6)(i) through (iii) of this condition.

(i) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.

(ii) A description of any corrective actions taken as a part of the tune-up of the boiler.

(iii) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.

(7) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.

(c) Limited-use boilers must conduct a tune-up every 5 years as specified in paragraphs (b)(1) through (7) of this condition. Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up. For a new or reconstructed limited-use boiler, the first 5-year tune-up must be no later than 61 months after the initial startup. You may delay the burner inspection specified in paragraph (b)(1) of this condition and inspection of the system controlling the air-to-fuel ratio specified in paragraph (b)(3) of this condition until the next scheduled unit shutdown, but you must inspect each burner and system controlling the air-to-fuel ratio at least once every 72 months. Limited-use boilers are not subject to the emission limits in Table 1, the energy assessment requirements in Table 2, or the operating limits in Table 3 of 40 CFR part 63 Subpart JJJJJJ .

40 CFR § 63.11223

Compliance Method: The permittee shall maintain records of required activities as specified at condition E4-17.

E4-17(SM1). Notification, reporting, and recordkeeping, requirements

(a) You must submit all of the notifications in 40 CFR §§ 63.7(b); 63.8(e) and (f); and 63.9(b) through (e), (g), and (h) that apply to you by the dates specified in those sections.

(1) An Initial Notification must be submitted no later than January 20, 2014. [Sonoco states: Item completed on time, but record not available.]

(2) You must submit the Notification of Compliance Status no later than 120 days after the applicable compliance date of March 21, 2014. [Sonoco states: Item was submitted March 21, 2014 through CEDRI on July 16, 2014.]

(3) Any paperwork notifications, records, plans or reports which must be submitted regarding requirements in 40 CFR, part 63, Subpart JJJJJJ, shall be submitted to both TN-APCD and EPA at the following addresses:

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

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

In lieu of submitting a paper copy to the above address for the TN-APCD, an electronic copy (PDF) can be submitted to the following email addresses. APC.Permitting@tn.gov

(b) You must prepare, by **March 1** of each year, and submit to the delegated authority upon request, an annual compliance certification report for the previous calendar year containing the information specified in paragraphs (b)(1) through (4) of this condition. You must submit the report by **March 15** if you had any instance described by paragraph (b)(3) of this condition. For boilers that are subject only to a requirement to conduct a biennial or 5-year tune-up according to 40 CFR § 63.11223(a) and not subject to emission limits or operating limits, you may prepare only a biennial or 5-year compliance report as specified in paragraphs (b)(1) and (2) of this condition.

(1) Company name and address.

(2) Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart. Your notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:

(i) "This facility complies with the requirements in 40 CFR § 63.11223 to conduct a biennial or 5-year tune-up, as applicable, of each boiler."

(ii) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: ‘‘No secondary materials that are solid waste were combusted in any affected unit.’’

(iii) ‘‘This facility complies with the requirement in 40 CFR §§ 63.11214(d) and 63.11223(g) to minimize the boiler’s time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer’s recommended procedures or procedures specified for a boiler of similar design if manufacturer’s recommended procedures are not available.’’

(3) If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.

(4) The total fuel use by each affected boiler subject to an emission limit, for each calendar month within the reporting period, including, but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by you or EPA through a petition process to be a non-waste under 40 CFR § 241.3(c), whether the fuel(s) were processed from discarded non-hazardous secondary materials within the meaning of 40 CFR § 241.3, and the total fuel usage amount with units of measure.

(c) You must maintain the records specified below:

(1) As required in 40 CFR § 63.10(b)(2)(xiv), you must keep a copy of each notification and report that you submitted to comply with 40 CFR part 63 Subpart JJJJJ and all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted.

(2) You must keep records to document conformance with the work practices, emission reduction measures, and management practices required by 40 CFR § 63.11214 and § 63.11223 as specified in paragraphs (c)(2)(i) through (vi) of this condition.

(i) For each boiler required to conduct an energy assessment, you must keep a copy of the energy assessment report.

(ii) For each boiler that meets the definition of limited-use boiler, you must keep a copy of the federally enforceable permit that limits the annual capacity factor to less than or equal to 10 percent and records of fuel use for the days the boiler is operating.

(3) Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.

(4) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in 40 CFR § 63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.

(d) Your records must be in a form suitable and readily available for expeditious review. You must keep each record for 5 years following the date of each recorded action. You must keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. You may keep the records off site for the remaining 3 years.

(e) If you have switched fuels or made a physical change to the boiler and the fuel switch or change resulted in the applicability of a different subcategory within Subpart JJJJJ, in the boiler becoming subject to Subpart JJJJJ, or in the boiler switching out of Subpart JJJJJ due to a change to 100 percent natural gas, or you have taken a permit limit that resulted in you being subject to Subpart JJJJJ, you must provide notice of the date upon which you switched fuels, made the physical change, or took a permit limit within 30 days of the change. The notification must identify:

(1) The name of the owner or operator of the affected source, the location of the source, the boiler(s) that have switched fuels, were physically changed, or took a permit limit, and the date of the notice.

(2) The date upon which the fuel switch, physical change, or permit limit occurred.

40 CFR § 63.11225

Compliance Method: The permittee shall maintain records of required activities and provide notifications as specified above.

15-0020-05	Source Description:	Two cylinder paperboard machines (PM1 and PM2). Secondary (recycled) paper including old corrugated boxes and old newspapers are the primary raw materials for the paperboard manufacturing process.
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Condition E5-1 applies to source 15-0020-05.

E5-1(SM1). Volatile organic compounds from this source shall not exceed **84.0** tons during any period of 12 consecutive months.

TAPCR 1200-03-07-.07(2) Application dated May 21, 2018 and permit no. **558654**.

Compliance Method: Compliance shall be assured by keeping a monthly record of material input. The permittee shall calculate VOC and HAP emissions on a monthly basis, and calculate annual emissions, per 12 consecutive months. The process input and the

VOC and HAP emissions shall be recorded in the following log (Log 7) or a similar log and submitted per **Condition E2**. These records shall be maintained at the source location for five years.

Log 7 12 Consecutive Month Log of VOC and HAP Emissions

Month	Finished paper produced	VOC emission factor* 1.02 lb VOC per air dried ton of paper	VOC emitted pounds per month	HAP emission factor* 0.036 lb methanol/air dried ton of paper	HAP emitted pounds per month	VOC emitted per any consecutive 12 month period	HAP emitted per any consecutive 12 month period

*Emission factors for Total VOC emissions and HAP emissions are from National Council for Air and Stream Improvement (NCASI) Technical Bulletin No. 882, August 2004

15-0020-08 Source Description: Tube Manufacturing and Coating. The applicable construction permit for this source is 978064, issued April 6, 2020, and amended on April 30, 2020 with Amendment #2 dated August 4, 2020.

Condition E6-1 applies to source 15-0020-08.

E6-1(SM1). Emission Limitations

Volatile organic compounds (VOC) emitted from this source shall not exceed 35.0 tons during any period of 12 consecutive months.

TAPCR 1200-03-07-.07(2) and the application dated December 18, 2019.

Compliance Method: (see following page)

LOG 9 – 12-CONSECUTIVE MONTH LOG

Month / Year	VOC Emissions Tons per Month	VOC (*) Emissions Tons per any consecutive 12 Month period	HAP 1 Emissions Tons per Month	HAP 1(*) Emissions Tons per any consecutive 12 Month period	HAP 2 Emissions Tons per Month	HAP 2(*) Emissions Tons per any consecutive 12 Month period	HAP 3 Emissions Tons per Month	HAP 3(*) Emissions Tons per any consecutive 12 Month period	HAP 4 Emissions Tons per Month	HAP 4(*) Emissions Tons per any consecutive 12 Month period	Total HAP Emissions Tons per any consecutive 12 Month period
1											
2											
3											
4											
5											
6											
7											
8											
9											
10											
11											
12											
13											
14											
15											

(*) **The Tons per 12 Month value is the sum of the VOC (or HAP) emissions in the 11 months preceding the month just completed + 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 Table, 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 [i.e., 6 (2) represents 6 tons emitted in 2 months]. This log is the total amount of VOCs and HAPs emitted to the air on a 12 month consecutive basis.**

End of Significant Modification #1 Permit No. 574123

ATTACHMENT 1

OPACITY MATRIX DECISION TREE for VISIBLE EMISSION EVALUATION METHOD 9

Dated June 18, 1996 - Amended September 11, 2013

**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.

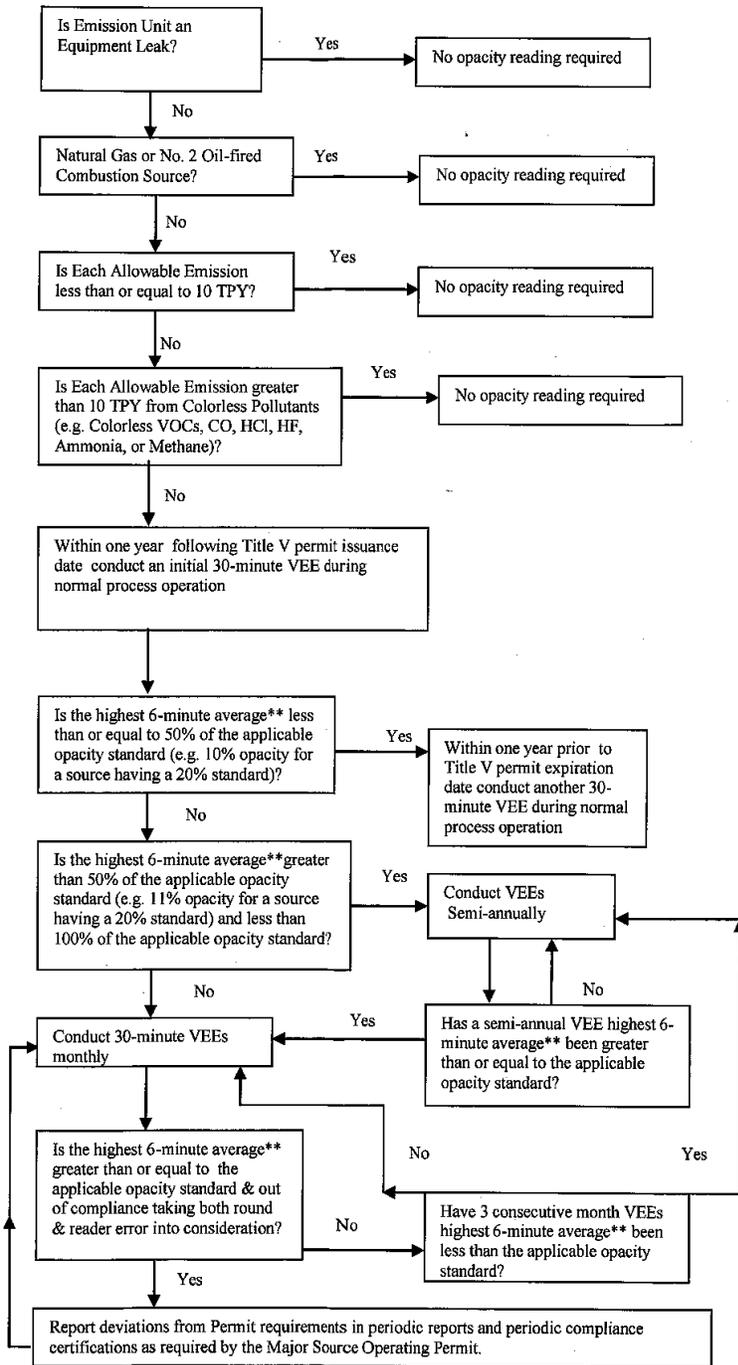
Reader Error
EPA Method 9, Non-NSPS or NESHAPS stipulated opacity standards: The TAPCD guidance is to declare non-compliance when the highest six-minute average** exceeds the standard plus 6.8% opacity (e.g. 26.8% for a 20% standard).

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.

Dated June 18, 1996
Amended September 11, 2013



ATTACHMENT 2

AP-42 emission factors for Natural Gas

Table 1.4-1. EMISSION FACTORS FOR NITROGEN OXIDES (NO_x) AND CARBON MONOXIDE (CO)
FROM NATURAL GAS COMBUSTION^a

Combustor Type (MMBtu/hr Heat Input) [SCC]	NO _x ^b		CO	
	Emission Factor (lb/10 ⁶ scf)	Emission Factor Rating	Emission Factor (lb/10 ⁶ scf)	Emission Factor Rating
Large Wall-Fired Boilers (≥100) [1-01-006-01, 1-02-006-01, 1-03-006-01]				
Uncontrolled (Pre-NSPS) ^c	280	A	84	B
Uncontrolled (Post-NSPS) ^c	190	A	84	B
Controlled - Low NO _x burners	140	A	84	B
Controlled - Flue gas recirculation	100	D	84	B
Small Boilers (<100) [1-01-006-02, 1-02-006-02, 1-03-006-02, 1-03-006-03]				
Uncontrolled	100	B	84	B
Controlled - Low NO _x burners	50	D	84	B
Controlled - Low NO _x burners/Flue gas recirculation	32	C	84	B
Tangential-Fired Boilers (All Sizes) [1-01-006-04]				
Uncontrolled	170	A	24	C
Controlled - Flue gas recirculation	76	D	98	D
Residential Furnaces (<0.3) [No SCC]				
Uncontrolled	94	B	40	B

^a Reference 11. Units are in pounds of pollutant per million standard cubic feet of natural gas fired. To convert from lb/10⁶ scf to kg/10⁶ m³, multiply by 16. Emission factors are based on an average natural gas higher heating value of 1,020 Btu/scf. To convert from lb/10⁶ scf to lb/MMBtu, divide by 1,020. The emission factors in this table may be converted to other natural gas heating values by multiplying the given emission factor by the ratio of the specified heating value to this average heating value. SCC = Source Classification Code. ND = no data. NA = not applicable.

^b Expressed as NO_x. For large and small wall fired boilers with SNCR control, apply a 24 percent reduction to the appropriate NO_x emission factor. For tangential-fired boilers with SNCR control, apply a 13 percent reduction to the appropriate NO_x emission factor.

^c NSPS=New Source Performance Standard as defined in 40 CFR 60 Subparts D and Db. Post-NSPS units are boilers with greater than 250 MMBtu/hr of heat input that commenced construction modification, or reconstruction after August 17, 1971, and units with heat input capacities between 100 and 250 MMBtu/hr that commenced construction modification, or reconstruction after June 19, 1984.

TABLE 1.4-2. EMISSION FACTORS FOR CRITERIA POLLUTANTS AND GREENHOUSE GASES FROM NATURAL GAS COMBUSTION^a

Pollutant	Emission Factor (lb/10 ⁶ scf)	Emission Factor Rating
CO ₂ ^b	120,000	A
Lead	0.0005	D
N ₂ O (Uncontrolled)	2.2	E
N ₂ O (Controlled-low-NO _x burner)	0.64	E
PM (Total) ^c	7.6	D
PM (Condensable) ^c	5.7	D
PM (Filterable) ^c	1.9	B
SO ₂ ^d	0.6	A
TOC	11	B
Methane	2.3	B
VOC	5.5	C

^a Reference 11. Units are in pounds of pollutant per million standard cubic feet of natural gas fired. Data are for all natural gas combustion sources. To convert from lb/10⁶ scf to kg/10⁶ m³, multiply by 16. To convert from lb/10⁶ scf to lb/MMBtu, divide by 1,020. The emission factors in this table may be converted to other natural gas heating values by multiplying the given emission factor by the ratio of the specified heating value to this average heating value. TOC = Total Organic Compounds. VOC = Volatile Organic Compounds.

^b Based on approximately 100% conversion of fuel carbon to CO₂. $CO_2[\text{lb}/10^6 \text{ scf}] = (3.67) (\text{CON}) (\text{C})(\text{D})$, where CON = fractional conversion of fuel carbon to CO₂, C = carbon content of fuel by weight (0.76), and D = density of fuel, 4.2x10⁴ lb/10⁶ scf.

^c All PM (total, condensable, and filterable) is assumed to be less than 1.0 micrometer in diameter. Therefore, the PM emission factors presented here may be used to estimate PM₁₀, PM_{2.5} or PM₁ emissions. Total PM is the sum of the filterable PM and condensable PM. Condensable PM is the particulate matter collected using EPA Method 202 (or equivalent). Filterable PM is the particulate matter collected on, or prior to, the filter of an EPA Method 5 (or equivalent) sampling train.

^d Based on 100% conversion of fuel sulfur to SO₂. Assumes sulfur content is natural gas of 2,000 grains/10⁶ scf. The SO₂ emission factor in this table can be converted to other natural gas sulfur contents by multiplying the SO₂ emission factor by the ratio of the site-specific sulfur content (grains/10⁶ scf) to 2,000 grains/10⁶ scf.

ATTACHMENT 3

AP-42 emission factors for Fuel Oil

Table 1.3-1. (cont.)

Firing Configuration (SCC) ^a	SO ₂ ^b		SO _x ^c		NO _x ^d		CO ^e		Filterable PM ^f	
	Emission Factor (lb/10 ³ gal)	EMISSION FACTOR RATING	Emission Factor (lb/10 ³ gal)	EMISSION FACTOR RATING	Emission Factor (lb/10 ³ gal)	EMISSION FACTOR RATING	Emission Factor (lb/10 ³ gal)	EMISSION FACTOR RATING	Emission Factor (lb/10 ³ gal)	EMISSION FACTOR RATING
Boilers < 100 Million Btu/hr										
No. 6 oil fired (1-02-004-02/03) (1-03-004-02/03)	1.57S	A	2S	A	55	A	5	A	9.19(S)+3.22 ^g	B
No. 5 oil fired (1-03-004-04)	1.57S	A	2S	A	55	A	5	A	10 ^h	A
No. 4 oil fired (1-03-005-04)	1.50S	A	2S	A	20	A	5	A	7	B
Distillate oil fired (1-02-005-02/03) (1-03-005-02/03)	1.42S	A	2S	A	20	A	5	A	2	A
Residential furnace (A210-004/A210-011)	1.42S	A	2S	A	18	A	5	A	0.4 ⁱ	B

- a To convert from lb/103 gal to kg/103 L, multiply by 0.120. SCC = Source Classification Code.
- b References 1-2,6-9,14,56-60. S indicates that the weight % of sulfur in the oil should be multiplied by the value given. For example, if the fuel is 1% sulfur, then S = 1.
- c References 1-2,6-8,16,57-60. S indicates that the weight % of sulfur in the oil should be multiplied by the value given. For example, if the fuel is 1% sulfur, then S = 1.
- d References 6-7,15,19,22,56-62. Test results indicate that at least 95% by weight of NOx is NO for all boiler types except residential furnaces, where about 75% is NO. For utility vertical fired boilers use 105 lb/103 gal at full load and normal (>15%) excess air. Nitrogen oxides emissions from residual oil combustion in industrial and commercial boilers are related to fuel nitrogen content, estimated by the following empirical relationship: lb NO₂/103 gal = 20.54 + 104.39(N), where N is the weight % of nitrogen in the oil. For example, if the fuel is 1% nitrogen, then N = 1.
- e References 6-8,14,17-19,56-61. CO emissions may increase by factors of 10 to 100 if the unit is improperly operated or not well maintained.
- f References 6-8,10,13-15,56-60,62-63. Filterable PM is that particulate collected on or prior to the filter of an EPA Method 5 (or equivalent) sampling train. Particulate emission factors for residual oil combustion are, on average, a function of fuel oil sulfur content where S is the weight % of sulfur in oil. For example, if fuel oil is 1% sulfur, then S = 1.
- g Based on data from new burner designs. Pre-1970's burner designs may emit filterable PM as high as 3.0 lb/103 gal.
- h The SO₂ emission factor for both no. 2 oil fired and for no. 2 oil fired with LNB/FCR, is 142S, not 157S. Errata dated April 28, 2000. Section corrected May 2010.
- i The PM factors for No.6 and No. 5 fuel were reversed. Errata dated April 28, 2000. Section corrected May 2010.

ATTACHMENT 4

Applicability of General Provisions to Subpart JJJJJ

The permittee shall comply with the applicable General Provisions according to the following:

General provisions cite	Subject	Does it apply?
§63.1	Applicability	Yes.
§63.2	Definitions	Yes. Additional terms defined in §63.11237.
§63.3	Units and Abbreviations	Yes.
§63.4	Prohibited Activities and Circumvention	Yes.
§63.5	Preconstruction Review and Notification Requirements	No
§63.6(a), (b)(1)–(b)(5), (b)(7), (c), (f)(2)–(3), (g), (i), (j)	Compliance with Standards and Maintenance Requirements	Yes.
§63.6(e)(1)(i)	General Duty to minimize emissions	No. <i>See</i> §63.11205 for general duty requirement.
§63.6(e)(1)(ii)	Requirement to correct malfunctions ASAP	No.
§63.6(e)(3)	SSM Plan	No.
§63.6(f)(1)	SSM exemption	No.
§63.6(h)(1)	SSM exemption	No.
§63.6(h)(2) to (9)	Determining compliance with opacity emission standards	Yes.
§63.7(a), (b), (c), (d), (e)(2)–(e)(9), (f), (g), and (h)	Performance Testing Requirements	Yes.
§63.7(e)(1)	Performance testing	No. <i>See</i> §63.11210.
§63.8(a), (b), (c)(1), (c)(1)(ii), (c)(2) to (c)(9), (d)(1) and (d)(2), (e),(f), and (g)	Monitoring Requirements	Yes.
§63.8(c)(1)(i)	General duty to minimize emissions and CMS operation	No.
§63.8(c)(1)(iii)	Requirement to develop SSM Plan for CMS	No.
§63.8(d)(3)	Written procedures for CMS	No.
§63.9	Notification Requirements	Yes.
§63.10(a) and (b)(1)	Recordkeeping and Reporting Requirements	Yes.
§63.10(b)(2)(i)	Recordkeeping of occurrence and duration of startups or shutdowns	No.
§63.10(b)(2)(ii)	Recordkeeping of malfunctions	No. <i>See</i> §63.11225 for recordkeeping of (1) occurrence and duration and (2) actions taken during malfunctions.
§63.10(b)(2)(iii)	Maintenance records	Yes.
§63.10(b)(2)(iv) and (v)	Actions taken to minimize emissions during SSM	No.
§63.10(b)(2)(vi)	Recordkeeping for CMS malfunctions	Yes.
§63.10(b)(2)(vii) to (xiv)	Other CMS requirements	Yes.
§63.10(b)(3)	Recordkeeping requirements for applicability determinations	No.
§63.10(c)(1) to (9)	Recordkeeping for sources with CMS	Yes.
§63.10(c)(10)	Recording nature and cause of malfunctions	No. <i>See</i> §63.11225 for malfunction recordkeeping requirements.
§63.10(c)(11)	Recording corrective actions	No. <i>See</i> §63.11225 for malfunction recordkeeping requirements.

§63.10(c)(12) and (13)	Recordkeeping for sources with CMS	Yes.
§63.10(c)(15)	Allows use of SSM plan	No.
§63.10(d)(1) and (2)	General reporting requirements	Yes.
§63.10(d)(3)	Reporting opacity or visible emission observation results	No.
§63.10(d)(4)	Progress reports under an extension of compliance	Yes.
§63.10(d)(5)	SSM reports	No. <i>See</i> §63.11225 for malfunction reporting requirements.
§63.10(e) and (f)		Yes.
§63.11	Control Device Requirements	No.
§63.12	State Authority and Delegation	Yes.
§63.13–63.16	Addresses, Incorporation by Reference, Availability of Information, Performance Track Provisions	Yes.

ATTACHMENT 5

Fee Selection Form 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.



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

Signer's name (type or print)	Title	Phone number with area code
-------------------------------	-------	-----------------------------

From: [Air.Pollution.Control](#)
To: [APC Permitting](#)
Subject: FW: Please upload - 15-0020 Sonoco Products Company FW: Signatory Authorization
Date: Friday, August 14, 2020 8:58:18 AM
Attachments: [20200813080353546.pdf](#)

From: Greg Forte <Greg.Forte@tn.gov>
Sent: Friday, August 14, 2020 08:26
To: Air.Pollution.Control <Air.Pollution.Control@tn.gov>
Subject: Please upload - 15-0020 Sonoco Products Company FW: Signatory Authorization

Please upload attachment to Sonoco Products Company ID 15-0020
Also, please update responsible official as noted- there will now be three R.O. 's
Received August 13 2020

From: Michael Steele <Michael.Steele@sonoco.com>
Sent: Thursday, August 13, 2020 4:40 PM
To: Greg Forte <Greg.Forte@tn.gov>
Subject: [EXTERNAL] Signatory Authorization

Greg,

Attached is the signatory authorization for Sonoco Newport. Hope to have the revised permit application tomorrow.

Sincerely,

Michael Steele
Environmental Principal
Global Environmental Services
Sonoco Products Company
Office: (843) 383-3383
Mobile: (423) 605-6250
michael.steele@sonoco.com

This e-mail message and all documents which accompany it are intended only for the use of the individual or entity to which addressed, and may contain privileged or confidential information. Any unauthorized disclosure or distribution of this e-mail message is prohibited. If you have received this e-mail message in error, please notify the sender and delete this from all computers.



August 13, 2020

TN Dept. of Environment & Conservation
Division of Air Pollution Control
William R. Snodgrass, TN Tower, 15th Floor
312 Rosa L. Parks Avenue
Nashville, TN 37243

RE: Signatory Authority
Sonoco Products Company, Newport, TN

Dear Division of Air Pollution Control:

As Vice President of Americas Industrial for Sonoco Products Company, I hereby authorize the Plant Managers and the Corporate Environmental Services personnel supporting the facility as the official representatives for environmental purposes for the Sonoco Products Company located in Newport, TN. The current Plant Manager for the Paper facility located at Newport is Shawn McIntosh, the current Plant Manager for the Tube and Core facility at Newport is Gail Saul, and the current Corporate Environmental Services personnel is Michael Steele.

If you have any questions regarding this matter, please contact Michael Steele of our Corporate Environmental Services Department at michael.steele@sonoco.com or (843) 383-3383

Sincerely,

A handwritten signature in blue ink, appearing to read 'James Harrell', with a horizontal line extending to the right.

James Harrell
Vice President, Americas Industrial

From: [Air.Pollution.Control](#)
To: [APC Permitting](#)
Subject: FW: Please upload to ID 15-0020 Sonoco Products Company Application #574123 FW: Mod Log Number 135262
Date: Friday, August 14, 2020 8:58:36 AM
Attachments: [image001.png](#)
[20200814074145770.pdf](#)

From: Greg Forte <Greg.Forte@tn.gov>
Sent: Friday, August 14, 2020 08:40
To: Air.Pollution.Control <Air.Pollution.Control@tn.gov>
Subject: Please upload to ID 15-0020 Sonoco Products Company Application #574123 FW: Mod Log Number 135262

Please upload as indicated – received today Aug 14
Revised APC Index form

From: Michael Steele <Michael.Steele@sonoco.com>
Sent: Friday, August 14, 2020 7:59 AM
To: Greg Forte <Greg.Forte@tn.gov>
Subject: [EXTERNAL] RE: Signatory Authorization

Greg,

Attached is the permit form with the signature reflecting today's date, please let me know if you need the other forms that don't have a signature requirement.

Sincerely,

Michael Steele
Environmental Principal
Global Environmental Services
Sonoco Products Company
Office: (843) 383-3383
Mobile: (423) 605-6250
michael.steele@sonoco.com

From: Greg Forte [<mailto:Greg.Forte@tn.gov>]
Sent: Friday, August 14, 2020 8:57 AM
To: Michael Steele <Michael.Steele@sonoco.com>
Subject: RE: Signatory Authorization

ATTENTION: This message was sent from outside of Sonoco. Use caution when clicking links or opening attachments.

Michael,

Received

Thanks

Greg Forte



Greg Forte | Environmental Protection Specialist 5

[Division of Air Pollution Control](#)

William R. Snodgrass Tennessee Tower

312 Rosa L. Parks Avenue, 15th Floor

Nashville, TN 37243

Office: 615-532-0548

greg.forte@tn.gov

Tell us how we're doing. [Take our TDEC customer service survey.](#)

From: Michael Steele <Michael.Steele@sonoco.com>

Sent: Thursday, August 13, 2020 4:40 PM

To: Greg Forte <Greg.Forte@tn.gov>

Subject: [EXTERNAL] Signatory Authorization

Greg,

Attached is the signatory authorization for Sonoco Newport. Hope to have the revised permit application tomorrow.

Sincerely,

Michael Steele

Environmental Principal

Global Environmental Services

Sonoco Products Company

Office: (843) 383-3383

Mobile: (423) 605-6250

michael.steele@sonoco.com

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**TITLE V PERMIT APPLICATION
 INDEX OF AIR POLLUTION PERMIT APPLICATION FORMS**

Section 1: Identification and Diagrams		
This application contains the following forms:	APC Form 1, Facility Identification	1
	APC Form 2, Operations and Flow Diagrams	1

Section 2: Emission Source Description Forms		
		Total number of this form
This application contains the following forms (one form for each incinerator, printing operation, fuel burning installation, etc.):	APC Form 3, Stack Identification	0
	APC Form 4, Fuel Burning Non-Process Equipment	0
	APC Form 5, Stationary Gas Turbines or Internal Combustion Engines	0
	APC Form 6, Storage Tanks	0
	APC Form 7, Incinerators	0
	APC Form 8, Printing Operations	0
	APC Form 9, Painting and Coating Operations	1
	APC Form 10, Miscellaneous Processes	0
	APC Form 33, Stage I and Stage II Vapor Recovery Equipment	0
APC Form 34, Open Burning	0	

Section 3: Air Pollution Control System Forms		
		Total number of this form
This application contains the following forms (one form for each control system in use at the facility):	APC Form 11, Control Equipment - Miscellaneous	0
	APC Form 13, Adsorbers	0
	APC Form 14, Catalytic or Thermal Oxidation Equipment	0
	APC Form 15, Cyclones/Settling Chambers	0
	APC Form 17, Wet Collection Systems	0
	APC Form 18, Baghouse/Fabric Filters	0

(OVER)

Section 4: Compliance Demonstration Forms

		Total number of this form
This application contains the following forms (one form for each incinerator, printing operation, fuel burning installation, etc.):	APC Form 19, Compliance Certification - Monitoring and Reporting - Description of Methods for Determining Compliance	0
	APC Form 20, Continuous Emissions Monitoring	0
	APC Form 21, Portable Monitors	0
	APC Form 22, Control System Parameters or Operating Parameters of a Process	0
	APC Form 23, Monitoring Maintenance Procedures	0
	APC Form 24, Stack Testing	0
	APC Form 25, Fuel Sampling and Analysis	0
	APC Form 26, Record Keeping	1
	APC Form 27, Other Methods	0
	APC Form 28, Emissions from Process Emissions Sources / Fuel Burning Installations / Incinerators	0
	APC Form 29, Emissions Summary for the Facility or for the Source Contained in This Application	1
	APC Form 30, Current Emissions Requirements and Status	1
	APC Form 31, Compliance Plan and Compliance Certification	0
APC Form 32, Air Monitoring Network	0	

Section 5: Statement of Completeness and Certification of Compliance

I have reviewed this application in its entirety and to the best of my knowledge, and based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate, and complete. I have provided all the information that is necessary for compliance purposes and this application consists of 10 pages and they are numbered from page 1 to 10. The status of this facility's compliance with all applicable air pollution control requirements, including the enhanced monitoring and compliance certification requirements of the Federal Clean Air Act, is reported in this application along with the methods to be used for compliance demonstration.

Name and Title of Responsible Official

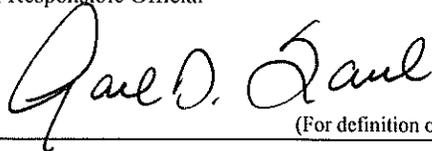
Telephone Number with Area Code

Gail Saul, Plant Manager

(423) 613-1225

Signature of Responsible Official

Date of Application



8/14/2020

(For definition of responsible official, see instructions for APC Form 1)

From: [Air.Pollution Control](#)
To: [APC Permitting](#)
Subject: FW: Construction Permit Application -Sonoco Products Company TV # 574123
Date: Thursday, December 19, 2019 9:55:41 AM
Attachments: [2019_TGapplpkg.pdf](#)
[CN-1430.pdf](#)
[2019_ROGSaul.pdf](#)

From: Peggi Davis [mailto:peggi.davis@sonoco.com]
Sent: Thursday, December 19, 2019 9:41 AM
To: Air.Pollution Control
Cc: Michael Steele
Subject: [EXTERNAL] Construction Permit Application -Sonoco Products Company TV # 574123

***** This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - STS-Security. *****

Attached please find a construction permit application and supporting documentation for installation of a finishing process to one of the existing permitted lines for the Sonoco facility in Newport, TN. Included in this submittal is the project description and necessary forms. Form 1430 is attached, though it appears the Completeness Checklist is something the agency would use so it was left blank. Also included is a letter delegating authority to an additional Responsible Official associated with this process.

If you have any questions or need additional information, please contact Michael Steele at michael.steele@sonoco.com.

Kind Regards,

Peggi Davis

Sonoco Global Environmental Services

peggi.davis@sonoco.com

843-383-7991 (office)

843-639-7287 (mobile)



This e-mail message and all documents which accompany it are intended only for the use of the individual or entity to which addressed, and may contain privileged or confidential information. Any unauthorized disclosure or distribution of this e-mail message is prohibited. If you have received this e-mail message in error, please notify the sender and delete this from all computers.



December 18, 2019

Mr. Robert Benjamin
TN Dept. of Environment. & Conservation
Division of Air Pollution Control
William R. Snodgrass, TN Tower, 151h Floor
312 Rosa L. Parks Avenue
Nashville, TN 37243

**RE: Sonoco Newport Facility Construction Application
Title V Permit Number 574123**

Dear Mr. Benjamin,

Based on positive trial results, Sonoco is submitting this construction application to add a new coating operation to an existing line, shown as the Spiral Tube Manufacturing process on the insignificant activities list of the current permit.

This coating will only be applied to certain formed tubes. For the PTE calculations, we used 35 TPY VOC and worked backwards because it is an intermittent process on an existing line, and as a new product, production estimates are not certain at this time. Since the VOC emissions will be less than 100 TPY for all paper coating operations as defined in Rule 1200-03-18-.14, the requirements under the Paper and Related Coating rule do not apply.

Included with this submittal are the following forms:

- 1397 – Index of forms
- 1398 – Facility Identification
- 1399 – Operations and flow diagram
- 1406 - Painting and Coating Operations
- 1421 – Compliance Demonstration by Recordkeeping
- 1424 – Emissions Summary
- 1425 – Current Emissions Requirements and Status
- 1430 – Application Completeness Checklist

Also, as this operation reports through a different division, another Responsible Official is being delegated. Please note Sonoco does not intend to replace the existing RO, Shaw McIntosh, though wishes to add Ms. Gail Saul who has direct authority over this process.

If you have any questions or need additional information, please contact me at michael.steele@sonoco.com.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Michael Steele'.

Michael Steele
Environmental Principal



**TITLE V PERMIT APPLICATION
 INDEX OF AIR POLLUTION PERMIT APPLICATION FORMS**

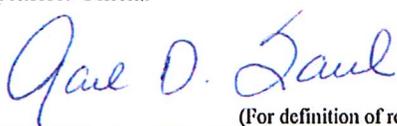
Section 1: Identification and Diagrams		
This application contains the following forms:	APC Form 1, Facility Identification	1
	APC Form 2, Operations and Flow Diagrams	1

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		Total number of this form
This application contains the following forms (one form for each incinerator, printing operation, fuel burning installation, etc.):	APC Form 3, Stack Identification	0
	APC Form 4, Fuel Burning Non-Process Equipment	0
	APC Form 5, Stationary Gas Turbines or Internal Combustion Engines	0
	APC Form 6, Storage Tanks	0
	APC Form 7, Incinerators	0
	APC Form 8, Printing Operations	0
	APC Form 9, Painting and Coating Operations	1
	APC Form 10, Miscellaneous Processes	0
	APC Form 33, Stage I and Stage II Vapor Recovery Equipment	0
APC Form 34, Open Burning	0	

Section 3: Air Pollution Control System Forms		
		Total number of this form
This application contains the following forms (one form for each control system in use at the facility):	APC Form 11, Control Equipment - Miscellaneous	0
	APC Form 13, Adsorbers	0
	APC Form 14, Catalytic or Thermal Oxidation Equipment	0
	APC Form 15, Cyclones/Settling Chambers	0
	APC Form 17, Wet Collection Systems	0
	APC Form 18, Baghouse/Fabric Filters	0

(OVER)

Section 4: Compliance Demonstration Forms		
		Total number of this form
This application contains the following forms (one form for each incinerator, printing operation, fuel burning installation, etc.):	APC Form 19, Compliance Certification - Monitoring and Reporting - Description of Methods for Determining Compliance	0
	APC Form 20, Continuous Emissions Monitoring	0
	APC Form 21, Portable Monitors	0
	APC Form 22, Control System Parameters or Operating Parameters of a Process	0
	APC Form 23, Monitoring Maintenance Procedures	0
	APC Form 24, Stack Testing	0
	APC Form 25, Fuel Sampling and Analysis	0
	APC Form 26, Record Keeping	1
	APC Form 27, Other Methods	0
	APC Form 28, Emissions from Process Emissions Sources / Fuel Burning Installations / Incinerators	0
	APC Form 29, Emissions Summary for the Facility or for the Source Contained in This Application	1
	APC Form 30, Current Emissions Requirements and Status	1
	APC Form 31, Compliance Plan and Compliance Certification	0
APC Form 32, Air Monitoring Network	0	

Section 5: Statement of Completeness and Certification of Compliance	
<p>I have reviewed this application in its entirety and to the best of my knowledge, and based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate, and complete. I have provided all the information that is necessary for compliance purposes and this application consists of <u>10</u> pages and they are numbered from page <u>1</u> to <u>10</u>. The status of this facility's compliance with all applicable air pollution control requirements, including the enhanced monitoring and compliance certification requirements of the Federal Clean Air Act, is reported in this application along with the methods to be used for compliance demonstration.</p>	
Name and Title of Responsible Official	Telephone Number with Area Code
Gail Saul, Plant Manager	(423) 613-1225
Signature of Responsible Official	Date of Application
	12/18/2019
(For definition of responsible official, see instructions for APC Form 1)	

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
 Telephone: (615) 532-0554



APC 1

TITLE V PERMIT APPLICATION FACILITY IDENTIFICATION

SITE INFORMATION			
1. Organization's legal name Sonoco Products Company - Newport		For APC Use Only	APC company point no.
2. Site name (if different from legal name)			APC Log/Permit no.
3. Site address (St./Rd./Hwy.) 766 Industrial Road		NAICS or SIC Code Paperboard Manufacturing SIC 2631	
City or distance to nearest town Newport		Zip code 37821	County name Cocke
4. Site location (in Lat./Long)	Latitude 36.017722	Longitude -83.204201	
CONTACT INFORMATION (RESPONSIBLE OFFICIAL)			
5. Responsible official contact Gail Saul		Phone number with area code 423-613-1225	
6. Mailing address (St./Rd./Hwy.) 766 Industrial Road		Fax number with area code	
City Newport	State TN	Zip code 37821	Email address gail.saul@sonoco.com
CONTACT INFORMATION (TECHNICAL)			
7. Principal technical contact Michael Steele		Phone number with area code 843-383-3383	
8. Mailing address (St./Rd./Hwy.) 1 North Second Street, mail code A55		Fax number with area code	
City Hartsville	State SC	Zip code 29550	Email address michael.steele@sonoco.com
CONTACT INFORMATION (BILLING)			
11. Billing contact Cindy Cripe		Phone number with area code 423-613-1218	
12. Mailing address (St./Rd./Hwy.) 766 Industrial Road		Fax number with area code	
City Newport	State TN	Zip code 37821	Email address cindy.cripe@sonoco.com
TYPE OF PERMIT REQUESTED			
13. Permit requested for:			
Initial application to operate :	<input type="checkbox"/>	Minor permit modification :	<input type="checkbox"/>
Permit renewal to operate :	<input type="checkbox"/>	Significant modification :	<input checked="" type="checkbox"/>
Administrative permit amendment :	<input type="checkbox"/>	Construction permit :	<input checked="" type="checkbox"/>

(OVER)

HAZARDOUS AIR POLLUTANTS, DESIGNATIONS, AND OTHER PERMITS ASSOCIATED WITH FACILITY		
14. Is this facility subject to the provisions governing prevention of accidental releases of hazardous air contaminants contained in Chapter 1200-03-32 of the Tennessee Air Pollution Control regulations?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If the answer is Yes, are you in compliance with the provisions of Chapter 1200-03-32 of the Tennessee Air Pollution Control regulations?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
15. If facility is located in an area designated as "Non-Attainment" or "Additional Control", indicate the pollutant(s) for the designation. Not Applicable		
16. List all valid Air Pollution permits issued to the <u>sources contained in this application</u> [identify all permits with most recent permit numbers and emission source reference numbers listed on the permit(s)]. Title V Permit Number 567288 Source Reference Number 15-0020		
17. Page number : 2	Revision number: 0	Date of revision: 12/18/2019

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
Telephone: (615) 532-0554



APC 2

TITLE V PERMIT APPLICATION OPERATIONS AND FLOW DIAGRAMS

1. Please list, identify, and describe briefly process emission sources, fuel burning installations, and incinerators that are contained in this application. Please attach a flow diagram for this application.

The existing tube manufacturing process involves spirally winding recycled paperboard strips onto a mandrel. The plies of paper are held together using water-based adhesives which are flow- or roll-coating applied. This new process would enable an airless valve jet applicator (similar to ink jet printing) to be put in place after the tube is formed to apply a coating to the outer surface for certain customer-specific products. No curing is needed for this coating. The coating material is combined with denatured ethanol in enclosed piping before reaching the applicator nozzle. The two components are stored in 55 gallon drums - no storage tanks are involved. No cleanup solvents are utilized. When not in use, the applicator is moved out of the way, and the chemical drums are kept closed.

2. List all insignificant activities which are exempted because of size or production rate and cite the applicable regulations.

Spiral Tube manufacturing process 1200-3-9-.04(5)(a)4(i)

3. Are there any storage piles?

YES _____ NO

4. List the states that are within 50 miles of your facility.

North Carolina

5. Page number:

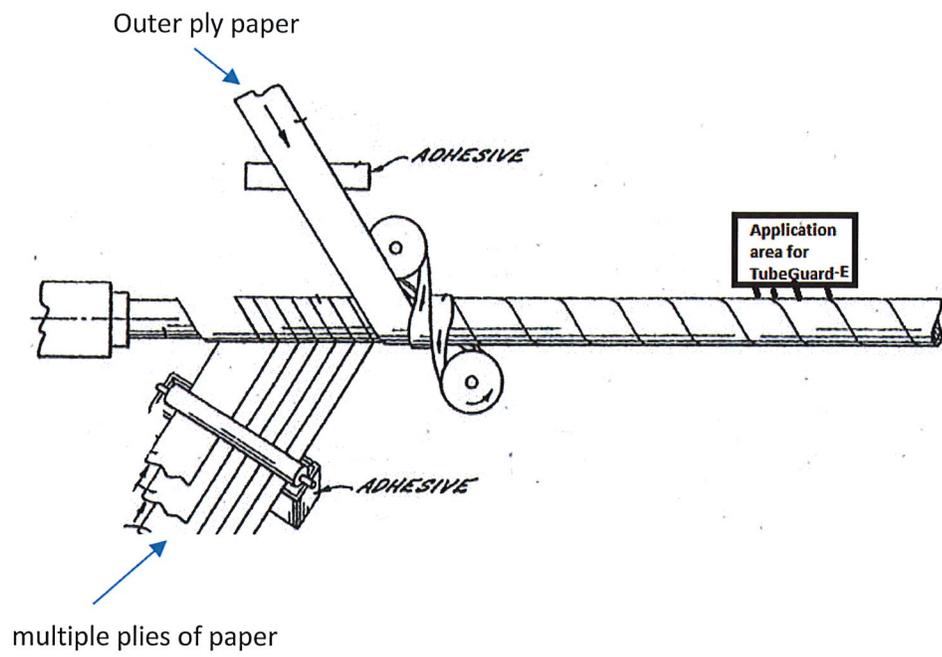
3

Revision Number:

0

Date of Revision:

12/18/2019



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
 Telephone: (615) 532-0554



**TITLE V PERMIT APPLICATION
 PAINTING AND COATING OPERATIONS**

GENERAL IDENTIFICATION AND DESCRIPTION

1. Facility name: Sonoco Products Comapny	
2. Process description: protective coating applied to the outer surface of certain pre-formed paper tubes and cores	
3. Year of construction or last modification: 2020	4. Stack ID or flow diagram point identification (s): fugitive inside building
If the emissions are controlled for compliance, attach an appropriate Air Pollution Control system form. If this printing operation is monitored for compliance, please attach the appropriate compliance demonstration form.	
5. Normal operating schedule 16 Hrs./Day 5 Days/Wk. 300 Days/Yr.	
6. Location of this operation in UTM coordinates: UTM Vertical: 36.017722 UTM Horizontal: -83.204201	
7. Oven curing (complete if applicable): Number of ovens: 0 Temperature of air contacting coated material as it leaves the oven (°F): _____ Specify oven fuels: N/A Total maximum heat input to each oven: _____	
8. Application technique and transfer efficiency (%): airless drop spray(similar to ink jet printing); 100% transfer of solids	

COATINGS AND SOLVENTS

9. Complete the following table – Attach additional tables as needed – Fill in only the items necessary for determination of compliance with emission standard(s).

Identify coatings	Maximum Usage		Normal Usage Gal./Mo.	Coating Composition: Volume and weight percent as applied								Density of Solvent Fraction Lbs./Gal.	Coating Density Lbs./Gal.
	Gal./Hr.	Gal./Mo.		Solids		Solvents (VOCs) Wt. %	Water		Exempt Solvent				
			Vol. %	Wt. %	Vol.		Wt.	Vol.	Wt.	Lbs./Gal.	Lbs./Gal.		
TubeGuard™-E Solution	4.0	896	420	0.75%	1%	95%	2.98%	4%	NA	NA	6.51	6.85	
Total coatings	4.0	896	420	0.75%	1%	95%	2.98%	4%	NA	NA	6.51	6.85	
List the Thinning Solvents used with the coatings identified above:													
(1):	3.85	851	404	0	0	100	0	0	NA		6.76	NA	
(2):													
Clean-up solvents:	NA												
Other (specify):	NA												

10. Page number: **5** Revision Number: **0** Date of Revision: **12/18/2019**

Emissions Calculations for TubeGuard™-E Solution

		VOC, % wt	density, lb/gal
Solvent	denatured ethanol	100%	6.76
components:	85.09% ethanol		
	4.31 % methanol		
	0.86% Hexone		
Coating as applied	TubeGuard™-E Solution	95%	6.85

	TPY	lbs/yr	gal/yr	gal/month
VOC emissions	35	70000	10,757	896
HAP (methanol 4.31%)	1.5	3017		

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
 Telephone: (615) 532-0554



APC 26

**TITLE V PERMIT APPLICATION
 COMPLIANCE DEMONSTRATION BY RECORDKEEPING**

Recordkeeping shall be acceptable as a compliance demonstration method provided that a correlation between the parameter value recorded and the applicable requirement is established.

GENERAL IDENTIFICATION AND DESCRIPTION

1. Facility name: Sonoco Products Company	2. Stack ID or flow diagram point identification(s): fugitive inside bulding (TG)
3. Emission source (identify): TubeGuard -E Solution application	

MONITORING AND RECORDKEEPING DESCRIPTION

4. Pollutant(s) or parameter being monitored: VOC , HAPs (methanol)
5. Material or parameter being monitored and recorded: coating material usage, VOC and HAP content
6. Method of monitoring and recording: Monthly recordkeeping of material usage, VOC and HAP content from SDS and formulation knowledge VOC records will be maintained similar to other permitted VOC sources as in permit condition E5-1, where the amount of material used is multiplied by the VOC content. Since the solvent to be used is denatured alcohol, which contains small amounts of HAPs , those emissions will be recorded and calculated in the same manner.

7. Compliance demonstration frequency (specify the frequency with which compliance will be demonstrated): Rolling 12 month total (VOCs/HAPs) calculated each month

8. Page number: 7	Revision number: 0	Date of revision: 12/18/2019
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**TITLE V PERMIT APPLICATION
 EMISSION SUMMARY FOR THE FACILITY OR FOR THE
 SOURCES CONTAINED IN THIS APPLICATION**

GENERAL IDENTIFICATION AND DESCRIPTION

1. Facility name: Sonoco Products Company

EMISSIONS SUMMARY TABLE – CRITERIA AND SELECTED POLLUTANTS

2. Complete the following emissions summary for regulated air pollutants at this facility or for the sources contained in this application.

Air Pollutant	Summary of Maximum Allowable Emissions		Summary of Actual Emissions	
	Tons per Year	Reserved for State use (Pounds per Hour- Item 4, APC 28)	Tons per Year	Reserved for State use (Pounds per Hour- Item 4, APC 28)
Particulate Matter (TSP)				
Sulfur Dioxide				
Volatile Organic Compounds	35		NA (expect~ 17)	
Carbon Monoxide				
Lead				
Nitrogen Oxides				
Total Reduced Sulfur				
Mercury				
Asbestos				
Beryllium				
Vinyl Chlorides				
Fluorides				
Gaseous Fluorides				
Greenhouse Gases in CO ₂ Equivalents				

(Continued on next page)

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
 Telephone: (615) 532-0554



**TITLE V PERMIT APPLICATION
 CURRENT EMISSIONS REQUIREMENTS AND STATUS**

GENERAL IDENTIFICATION AND DESCRIPTION					
1. Facility name: Sonoco Products Company			2. Emission source number IA- Spiral Tube manufacturing process		
3. Describe the process emission source / fuel burning installation / incinerator. New coating to be applied to outer surface of some formed tubes					
EMISSIONS AND REQUIREMENTS					
4. Identify if only a part of the source is subject to this requirement	5. Pollutant	6. Applicable requirement(s): TN Air Pollution Control Regulations, 40 CFR, permit restrictions, air quality based standards	7. Limitation	8. Maximum actual emissions	9. Compliance status (In/Out)
	VOC	1200-3-9-.04(5)(a)4(i)	IA definition	< 0.4 tons (YTD)	In
10. Other applicable requirements (new requirements that apply to this source during the term of this permit)					
TubeGuard -E	VOC	1200-03-18	35 tpy	NA yet	
11. Page number: 10		Revision number: 0		Date of revision: 12/18/2019	



December 18, 2019

TN Dept. of Environment & Conservation
Division of Air Pollution Control
William R. Snodgrass, TN Tower, 151h Floor
312 Rosa L. Parks Avenue
Nashville, TN 37243

**RE: Signatory Authority
Sonoco Products Company, Newport, TN**

Dear Department of Ecology,

As a Vice President of Tubes and Cores for Sonoco Products Company, I hereby authorize the plant manager to sign as the official representative for environmental purposes for the Newport, TN Tube and Core facility. The position is currently held by Gail Saul.

If you have any questions regarding this matter, please contact Peggi Davis of our corporate Environmental Services department at peggi.davis@sonoco.com, or (843)383-7991.

Sincerely,

A handwritten signature in blue ink, appearing to read 'James Harrell'.

James Harrell
V.P. Tubes & Cores, US & Canada



**TITLE V PERMIT APPLICATION
 APPLICATION COMPLETENESS CHECK LIST**

Note to Applicants: The Application Completeness Check List is required by Division Rule 1200-03-09-.02(11)(d)1(ii)(I) and is used by Division staff to determine whether or not an application is complete. This checklist will be used to resolve any dispute between the applicant and the Division regarding the completeness of an application.

Section 1: Identification and Diagrams (APC 1 and APC 2)		
Requirement	Complete	Incomplete
Site Information	<input type="checkbox"/>	<input type="checkbox"/>
Contact Information (Responsible Official)	<input type="checkbox"/>	<input type="checkbox"/>
Contact Information (Technical)	<input type="checkbox"/>	<input type="checkbox"/>
Contact Information (Billing)	<input type="checkbox"/>	<input type="checkbox"/>
Type of Permit Requested	<input type="checkbox"/>	<input type="checkbox"/>
Accidental Release Information	<input type="checkbox"/>	<input type="checkbox"/>
Nonattainment/Additional Control Area Designation	<input type="checkbox"/>	<input type="checkbox"/>
List of Valid Permits	<input type="checkbox"/>	<input type="checkbox"/>
List and description of process emission sources, fuel burning installations, and incinerators	<input type="checkbox"/>	<input type="checkbox"/>
Flow diagram attached?	<input type="checkbox"/>	<input type="checkbox"/>
List of Insignificant Activities	<input type="checkbox"/>	<input type="checkbox"/>
List of Storage Piles	<input type="checkbox"/>	<input type="checkbox"/>
List of States within 50 Miles	<input type="checkbox"/>	<input type="checkbox"/>
Section 2: Emission Source Description Forms		
Forms are complete as received:		<input type="checkbox"/>
Forms are incomplete (one or more application forms not submitted)		<input type="checkbox"/>
Forms are incomplete (missing information on the following application forms):	APC Form 3, Stack Identification	<input type="checkbox"/>
	APC Form 4, Fuel Burning Non-Process Equipment	<input type="checkbox"/>
	APC Form 5, Stationary Gas Turbines or Internal Combustion Engines	<input type="checkbox"/>
	APC Form 6, Storage Tanks	<input type="checkbox"/>
	APC Form 7, Incinerators	<input type="checkbox"/>
	APC Form 8, Printing Operations	<input type="checkbox"/>
	APC Form 9, Painting and Coating Operations	<input type="checkbox"/>
	APC Form 10, Miscellaneous Processes	<input type="checkbox"/>
	APC Form 33, Stage I and Stage II Vapor Recovery Equipment	<input type="checkbox"/>
	APC Form 34, Open Burning	<input type="checkbox"/>

Section 3: Air Pollution Control System Forms			
Forms are complete as received:		<input type="checkbox"/>	
Forms are incomplete (one or more application forms not submitted)		<input type="checkbox"/>	
Forms are incomplete (missing information on the following application forms):	APC Form 11, Control Equipment - Miscellaneous	<input type="checkbox"/>	
	APC Form 13, Adsorbers	<input type="checkbox"/>	
	APC Form 14, Catalytic or Thermal Oxidation Equipment	<input type="checkbox"/>	
	APC Form 15, Cyclones/Settling Chambers	<input type="checkbox"/>	
	APC Form 17, Wet Collection Systems	<input type="checkbox"/>	
	APC Form 18, Baghouse/Fabric Filters	<input type="checkbox"/>	
Section 4: Compliance Demonstration Forms			
Forms are complete as received:		<input type="checkbox"/>	
Forms are incomplete (one or more application forms not submitted)		<input type="checkbox"/>	
Forms are incomplete (missing information on the following application forms):	APC Form 19, Compliance Certification - Monitoring and Reporting - Description of Methods for Determining Compliance	<input type="checkbox"/>	
	APC Form 20, Continuous Emissions Monitoring	<input type="checkbox"/>	
	APC Form 21, Portable Monitors	<input type="checkbox"/>	
	APC Form 22, Control System Parameters or Operating Parameters of a Process	<input type="checkbox"/>	
	APC Form 23, Monitoring Maintenance Procedures	<input type="checkbox"/>	
	APC Form 24, Stack Testing	<input type="checkbox"/>	
	APC Form 25, Fuel Sampling and Analysis	<input type="checkbox"/>	
	APC Form 26, Recordkeeping	<input type="checkbox"/>	
	APC Form 27, Other Methods	<input type="checkbox"/>	
	APC Form 28, Emissions from Process Emissions Sources / Fuel Burning Installations / Incinerators	<input type="checkbox"/>	
	APC Form 29, Emissions Summary for the Facility or for the Source Contained in This Application	<input type="checkbox"/>	
	APC Form 30, Current Emissions Requirements and Status	<input type="checkbox"/>	
	APC Form 32, Air Monitoring Network	<input type="checkbox"/>	
Section 5: Statement of Completeness and Certification of Compliance			
Requirement	Complete	Incomplete	Not Applicable
Certification of Truth, Accuracy, and Completeness (Form APC 1, Section 5)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General Identification and Description (Form APC 31, Items 1 and 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Compliance Certification for Sources Currently in Compliance (Form APC 31, Item 3A)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Compliance Certification for New Applicable Requirements (Form APC 31, Item 3B)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Identification of Sources Currently Not in Compliance (Form APC 31, Item 4A)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Compliance Schedule for Sources Currently Not in Compliance (Form APC 31, Item 4B)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Compliance Certification for Enhanced Monitoring (Form APC 31, Item 5)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Section 6: Miscellaneous Information		
Item	Included	Not Included
For Title V modifications, is a description of the modification included?	<input type="checkbox"/>	<input type="checkbox"/>
Request for Permit Shield	<input type="checkbox"/>	<input type="checkbox"/>
Calculations on which emissions-related information are based	<input type="checkbox"/>	<input type="checkbox"/>
Identification of alternative operating scenarios, as applicable	<input type="checkbox"/>	<input type="checkbox"/>
Explanation of any proposed exemptions from otherwise applicable requirements	<input type="checkbox"/>	<input type="checkbox"/>
Other information needed for completeness (explain in comments)	<input type="checkbox"/>	<input type="checkbox"/>

Section 7: Comments

Describe any missing information below or in a separate attachment:

Section 8: Application Completeness

Application is Complete	<input type="checkbox"/>
Application is Incomplete	<input type="checkbox"/>