PUBLIC NOTICE

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

The applicant is Multicolor Corporation with a site address of 801 Alfred Thun Rd., Clarksville, TN 37040. They have applied for renewal of their existing major source (Title V) operating permit for their product and packaging rotogravure printing operation.

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

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

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

Division of Air Pollution Control
Nashville Environmental Field Office
711 R.S. Gass Boulevard
Nashville, TN 37216

and

Tennessee Department of Environment and Conservation
Division of Air Pollution Control
Davy Crockett Tower, 7th Floor
500 James Robertson Parkway
Nashville, TN 37243

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

Air Notices & Hearings

Questions concerning the source(s) may be addressed to Shandia Deloach at (615) 655-3234 or by e-mail at shandia.delaoch@tn.gov.

Interested parties are invited to review these materials and comment. In addition, a public hearing may be requested at which written or oral presentations may be made. To be considered, written comments or requests for a public hearing must be received no later than 4:30 PM on **December 9, 2026** 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 Oakes, Director, Division of Air Pollution Control, Davy Crockett Tower, 7th Floor, 500 James Robertson Parkway, 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, Davy Crockett Tower, 5th Floor, 500 James Robertson Parkway, Nashville, TN 37243, 1-(866)-253-5827. Hearing impaired callers may use the Tennessee Relay Service, 1-(800)-848-0298.

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

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

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

Date Issued:

Permit Number:

Date Expires:

579783

Issued To:
Multi-Color Corporation

Installation Address:
801 Alfred Thun Road
Clarksville

Installation Description: Product and Packaging Rotogravure Printing Facility

02: One Steam Generating Boiler (NSPS–Subpart Dc) and three Thermal Heaters
04: Ink Preparation Operation (PSD-LAER) with Wet Scrubber and Carbon Adsorption Control
06: Rotogravure Printing Operation (MACT-Subpart KK) with Carbon Adsorption Control
07: Varnish Coating Operation
16: One 60 HP Emergency Generator Engine and One 300 HP Emergency Fire Pump Engine
19: 10-Rotagravure Printing Operation with Laminator and RTO control (including a cylinder wash tank)
20: Stand Alone Laminator with RTO Control

Facility ID: 63-0123

Renewal Application Due Date:

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

Primary SIC: 27

Information Relied Upon:
Renewal Application dated January 3, 2022

(continued on the next page)

TECHNICAL SECRETARY

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

POST AT INSTALLATION ADDRESS

PROPOSED

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End of Permit #579783

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ATTACHMENT 1	Opacity Matrix Decision Tree for Visible Emission Evaluation Method 9 dated June 18, 1996 (amended September 11, 2013)	1 page
ATTACHMENT 2	Compliance Assurance Monitoring for Carbon Adsorption VOC Recovery	3 pages
ATTACHMENT 3	Title V Fee Selection Form APC 36	2 pages
ATTACHMENT 4	General Provisions for 40 CFR Part 60, Subpart Dc	1 page

PROPOSED

ATTACHMENT 5 **General Provisions for 40 CFR Part 63, Subpart KK** **1 page**

ATTACHMENT 6 **General Provisions for 40 CFR Part 63, Subpart ZZZZ** **1 page**

PROPOSED

SECTION A
GENERAL PERMIT CONDITIONS

A permit issued under the provisions of Tennessee Air Pollution Control Regulations (TAPCR) 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 regulations.

TAPCR 1200-03 and 0400-30

A2. **Compliance requirement.** All terms and conditions in a permit issued pursuant to TAPCR 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)

PROPOSED

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 fee in accordance with TAPCR 1200-03-26-.02(9) based upon the applicable base fee; the applicable permit modification fee(s); 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 the applicable base fee; the applicable permit modification fee(s); and 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 TAPCR Rule 1200-03-26-.02 and paragraph 1200-03-09-.02(11) applicable to such fees.

(d) Where more than one 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 TAPCR paragraph 1200-03-26-.02(9) shall apportion their emissions as follows to ensure that their fees are not double counted.

1. Emissions of hazardous air pollutants (HAP) that are included in the particulate matter (including PM_{10}) category or the volatile organic compound category shall be included in those categories.

2. HAP that are not included in either the particulate matter category or volatile organic compound category shall be included in the category of Hazardous Air Pollutants Not Included Above.

3. Each individual HAP is subject to the 4,000 ton cap provisions of TAPCR subparagraph 1200-03-26-.02(2)(i).

4. Major sources that wish to pay annual emission fees for PM_{10} on an allowable emission basis may do so if they have a specific PM_{10} allowable emission standard. If a major source has a total particulate emission standard, but wishes to pay annual emission fees on an actual PM_{10} emission basis, it may do so if the PM_{10} actual emission levels are proven to the satisfaction of the Technical Secretary. The method to demonstrate the actual PM_{10} emission levels must be made as part of the source's major source operating permit in advance in order to exercise this option. The PM_{10} emissions reported under these options shall not be subject to fees under the family of particulate emissions. The 4,000 ton cap provisions of TAPCR subparagraph 1200-03-26-.02(2)(i) shall also apply to PM_{10} emissions.

(e) Emissions of pollutants that do not fall in one of the listed categories shall be included in the category of Miscellaneous Pollutants Not Listed Above. Each miscellaneous pollutant is subject to the 4,000-ton cap provisions.

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 the 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, TAPCR 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)

PROPOSED

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.

(d) The permit shield does not apply to permit changes made under the minor permit modification procedures of TAPCR subpart 1200-03-09-.02(11)(f)5(ii) nor the administrative permit amendment procedures of TAPCR part 1200-03-09-.02(11)(f)4, except that the permit shield may be extended for administrative permit amendments that meet the relevant requirements of TAPCR subparagraph 1200-03-09-.02(11)(e), subparagraph 1200-03-09-.02(11)(f) and subparagraph 1200-03-09-.02(11)(g) for significant permit modifications.

(e) The permit shield does not apply to off-permit changes made under the operational flexibility provisions of TAPCR part 1200-03-09-.02(11)(a)4.

TAPCR 1200-03-09-.02(11)(e)6 and 1200-03-09-.02(11)(f)4(iv)

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 TAPCR 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 TAPCR part 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.

PROPOSED

(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 TAPCR paragraph 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 paragraph 1200-03-09-.03(1) and TAPCR Rule 1200-03-15-.03.

A16. **Construction permit required.** Except as exempted in TAPCR Rule 1200-03-09-.04, or excluded in TAPCR subparagraph 1200-03-02-.01(1)(aa) or TAPCR subparagraph 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 and no later than required by the provisions of the new applicable requirement. 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, 1200-03-09-.03(8), 0400-30-38, 0400-30-39, and 40 CFR Part 70.5(c)

PROPOSED

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.

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

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)

PROPOSED

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.

PROPOSED

* "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	U.S. EPA Compliance and Emissions Data Reporting Interface (CEDRI) or Air Enforcement Branch US EPA Region IV EPA_R4_CAA_Reports@epa.gov

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 TAPCR Rule 1200-03-20-.03. For the purposes of this condition, "emergency" shall be substituted for "malfunction(s)" in TAPCR 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 TAPCR Divisions 1200-03 and 0400-30 or other applicable requirement.

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

PROPOSED

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 TAPCR 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, the probable cause of the deviation, and any corrective actions or preventative measures taken. 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 TAPCR 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 days after receipt of the notice of violation, the data required below. If this data has been made 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 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(s) 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 20-day period specified shall preclude the admissibility of the data for determination of potential enforcement action.

PROPOSED

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

PROPOSED

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 TAPCR Chapter 1200-03-30.

(b) The change cannot be a modification under any provision of Title I of the federal Act or TAPCR 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 TAPCR 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 TAPCR 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 TAPCR 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 part 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 part 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 TAPCR part 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 part 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 subparagraph 1200-03-09-.02(11)(e), TAPCR subparagraph 1200-03-09-.02(11)(f) and TAPCR subparagraph 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 subpart 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.

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(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 subpart 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 Rule 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 part 1200-03-09-.02(11)(f)4 or the significant modification route of TAPCR subpart 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 subpart 1200-03-09-.02(11)(f)5(ii) or group processing of minor modifications under the provisions of TAPCR subpart 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)

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SECTION D
GENERAL APPLICABLE REQUIREMENTS

D1. **Visible emissions.**

(a) 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 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 20 percent (6-minute average) except for one six minute period per one hour of not more than 40 percent opacity. Sources constructed or modified after July 7, 1992, shall utilize 6-minute averaging.

(b) 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 Chapter 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 Chapter 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 part 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 Chapter 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 stockpiles, 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 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 TAPCR Chapter 1200-03-20.

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TAPCR 1200-03-08

D8. **Open burning.** The permittee shall comply with the TAPCR Chapter 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 40 CFR Part 61 when conducting any renovation or demolition activities at the facility.

TAPCR 0400-30-38-.01(2) 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 insignificant emission units or activities. By annual certification of compliance with the conditions in this Section the permittee shall be considered to meet the monitoring and related record keeping and reporting requirements of TAPCR subpart 1200-03-09-.02(11)(e)1(iii) and part 1200-03-10-.04(2)(b)1 and the compliance requirements of TAPCR subpart 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.** The permittee shall comply with all applicable requirements of TAPCR Chapter 0400-30-38 for all emission sources subject to a requirement contained therein.

D12. **Standards of Performance for New Stationary Sources.** The permittee shall comply with all applicable requirements of TAPCR chapters 0400-30-39 and 1200-03-16 for all emission sources subject to a requirement contained therein.

D13. **Gasoline Dispensing Facilities.** The permittee shall comply with all applicable requirements of TAPCR Rule 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 Rule 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 Chapter 0400-30-39.
(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 Chapter 0400-30-39.

TAPCR 0400-30-38 and 39

D15. The permittee shall maintain and repair each 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)

PROPOSED

SECTION E

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

63-0123	**Facility Description:**	Precision Printing and Packaging, Inc. dba Constantia Flexibles–Labels Division is a packaging rotogravure printing facility that produces printed labels for food and beverage products.

E1. Fee payment

FEE EMISSIONS SUMMARY TABLE FOR MAJOR SOURCE 63-0123

REGULATED POLLUTANTS	ALLOWABLE EMISSIONS (tons per AAP)	ACTUAL EMISSIONS (tons per AAP)	COMMENTS
PARTICULATE MATTER (PM)	15.81	AEAR	Includes all fee emissions
SO_2	120.15	AEAR	Includes all fee emissions
VOC	386.62	AEAR	Includes all fee emissions
NO_X	16.05	AEAR	Includes all fee emissions
Facility-Wide Total HAP Limit		AEAR	
Facility-Wide Individual HAP Limit		AEAR	
HAZARDOUS AIR POLLUTANTS (HAPs) NOT INCLUDED ABOVE*			
		AEAR	
		AEAR	
		AEAR	
MISCELLANEOUS POLLUTANTS NOT LISTED ABOVE**			
EACH MISC POLLUTANT NOT LISTED ABOVE			
		AEAR	
		AEAR	
		AEAR	
		AEAR	

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 **AAP** at the time of permit renewal issuance **began July 1, 2026 and ends June 30, 2027.** The next Annual Accounting Period begins **July 1, 2027** and ends **June 30, 2028** 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 **A**ctual **E**missions **A**nalysis is **R**equired to determine the actual emissions of:

(1) **each regulated pollutant** (Particulate matter, SO_2, VOC, NO_X and so forth. See TAPCR 1200-03-26-.02(2)(i) for the definition of a regulated pollutant.),

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(2) the "HAP Not Included Above" Category (non-VOC and non-PM HAP not included in a facility-wide limit), and

(3) the Miscellaneous Category

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

* **Hazardous Air Pollutants Not Included Above:** This category is made-up of hazardous air pollutants that are not included in the VOC or PM category, such as HCl and HF, and are not included in a facility-wide HAP emission limitation. **For fee computation**, each individual hazardous air pollutant is subject to the 4,000-ton cap provisions of subparagraph 1200-03-26-.02(2)(i) of the TAPCR.

** **Miscellaneous Pollutants Not Listed Above:** This category is for pollutants that are not included in one of the other categories but for which an emission limitation has been established in this permit (including NSPS pollutants). **For fee computation**, each pollutant in this category is subject to the 4,000-ton cap provisions of subparagraph 1200-03-26-.02(2)(i).

END NOTES

The permittee shall:

(1) Pay Title V **annual fees**, (including the emissions fee, base fee, significant modification fee, & minor modification fee), 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)(a). 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 fees on an allowable emissions basis: pay annual fees for each AAP no later than April 1 of each year pursuant to TAPCR 1200-03-26-.02(9)(d).
TAPCR 1200-03-26-.02(9)(a)2(i)

(3) Sources paying annual fees on a calendar year basis and an actual or mixed emissions basis: pay annual allowable based emission fees for each AAP no later than April 1 of each year pursuant to TAPCR 1200-03-26-.02(9)(d), except as allowed by TAPCR 1200-03-26-.02(9)(g)3.
TAPCR 1200-03-26-.02(9)(a)2(ii)

(4) Sources paying annual fees on a fiscal year basis and an actual or mixed emissions basis: for each AAP, pay an estimated 65% of the fee due no later than April 1 of the current fiscal year. The remainder of the fee for each annual accounting period is due no later than August 1 of each year pursuant to TAPCR 1200-03-26-.02(9)(d),except as allowed by TAPCR 1200-03-26-.02(9)(a)2(iii)

(5) Sources paying annual 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 Fee Year 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**.
TAPCR 1200-03-26-.02(9)(g)2

(6) Sources paying annual fees on a Fee Choice of 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**,

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(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 Year 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 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).

TAPCR 1200-03-26-.02(9)(g)2

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

TAPCR 1200-03-26-.02(9)(g)2

(8) Include with each required AEAR report the following statement signed by the Responsible Official: *"I have reviewed this document in its entirety, and to the best of my knowledge, based on information and belief formed after reasonable inquiry, the statements and information contained in this document are true, accurate, and complete."*

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

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

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

Payment of Fee to:
The Tennessee Department of Environment and Conservation
Division of Fiscal Services
Consolidated Fee Section – APC
Davy Crockett Tower, 6th Floor
500 James Robertson Parkway
Nashville, Tennessee 37243

and

Actual Emissions Analyses to:
A "Title V Emissions Summary Form" and the AEAR must be submitted electronically as directed by the Division. Additional information can be found at https://www.tn.gov/environment/air/inventory.html

TAPCR 1200-03-26-.02(3), (8), and (9), and TAPCR 1200-03-09-.02(11)(e)1(vii)

E2. Reporting requirements.

(a) **Semiannual reports.** Semiannual reports shall cover the six-month periods from **April 1, 2026** to **September 30, 2026** and **October 1, 2026** to **March 31, 2027** and shall be submitted within 60 days after the end of each six-month period. Subsequent reports shall be submitted within 60 days after the end of each 6-month period following the first report. The first semiannual report following issuance of this permit shall cover the following permits and reporting periods:

Permit Number	Reporting Period Begins	Reporting Period Ends
571355	1st day of SAR period (with year)	day before new permit issuance (with year)
579783	Issuance Date of new permit (with year)	end of SAR period (with year)

These semiannual reports shall include:

(1) Any monitoring and recordkeeping required by **Conditions E3-2, E3-3, E3-8(CAM), E4-1, E4-2, E5-4, E5-5, E5-8, E6-1, E6-2, E7-1, E7-2, E8-1, E8-2, E8-3, E9-1, E9-2, and E10-9** 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.

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(2) The visible emission evaluation readings from **Condition E3-6** 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**. The record of deviations/excursions shall include, at a minimum, the time the deviation/excursion was discovered, the corrective action taken, and the time that the deviation/excursion was rectified.

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, 2026** to **March 31, 2027** and shall be submitted within 60 days after the end of each 12-month period. The first annual compliance certification following issuance of this permit shall cover the following permits and reporting periods:

Permit Number	Reporting Period Begins	Reporting Period Ends
571355	April 1, 2026	day before new permit issuance (with year)
579783	Issuance Date of new permit (with year)	March 31, 2027

These certifications shall be submitted to: **TN APCD** and **EPA**

Division of Air Pollution Control
Nashville Environmental Field Office
711 R.S. Gass Boulevard
Nashville, TN 37216
or
APC.NashEFO@tn.gov

and

Air Enforcement Branch
US EPA Region IV
61 Forsyth Street, SW
Atlanta, Georgia 30303
or
EPA_R4_CAA_Reports@epa.gov
or
Through the EPA CDX
(https://cdx.epa.gov/)

PROPOSED

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

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

E3. **General permit Conditions.**

E3-1. Identification of Responsible Official, Technical Contact, and Billing Contact:

(a) The application that was utilized in the preparation of this permit is dated January 5 2022, and signed by Responsible Official Jean Smith, Plant Manager-Clarksville for the permitted facility. Notification received August 14, 2024 identifies Hartley Parnell, Plant Manager is now the Responsible Official. If this person terminates employment or is assigned different duties and is no longer a Responsible Official for this facility as defined in part 1200-03-09-.02(11)(b)21 of the Tennessee Air Pollution Control Regulations, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within thirty days of the change. The notification shall include the name and title of the new Responsible Official and certification of truth and accuracy. All representations, agreement to terms and conditions, and covenants made by the former Responsible Official that were used in the establishment of the permit terms and conditions will continue to be binding on the facility until such time that a revision to this permit is obtained that would change said representations, agreements, and/or covenants.

(b) The application that was utilized in the preparation of this permit is dated January 5, 2022, and identifies Bettina Perkins, US EHS Manager, Food & Beverage. Notification received August 14, 2024 identifies Chris Taylor, Safety Leaders as the Principal Technical Contact for the permitted facility. If this person terminates employment or is assigned different duties and is no longer the Principal Technical Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within thirty days of the change. The notification shall include the name and title of the new Principal Technical Contact and certification of truth and accuracy.

(c) The application that was utilized in the preparation of this permit is dated February 11, 2016, and identifies Bettina Perkins, US EHS Manager, Food & Beverage as the Billing Contact for the permitted facility. Notification received August 14, 2024 identifies Chris Taylor, Safety Leader as the Billin Contact. If this person terminates employment or is assigned different duties and is no longer the Billing Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within thirty days of the change. The notification shall include the name and title of the new Billing Contact and certification of truth and accuracy.

E3-2. **Area Source Requirements and VOC records**

This printing facility (63-0123) is regulated by rule 40 CFR Part 63 Subpart KK that requires Maximum Achievable Control Technology (MACT) standards for the Printing and Publishing Industry (includes rotogravure). In accordance with 40 CFR Part 63 Subpart KK, a facility can, at the option of the owner or operator, become an area source subject only to the provisions of paragraphs 40 CFR §63.829(d) and 40 CFR §63.830(b)(1) of the aforementioned subpart KK by meeting usage limits. The usage limits ensure that the facility's potential and actual emissions of Hazardous Air Pollutant (HAP) are below the major source thresholds of 10 tons of a single HAP and 25 tons of a combination of HAP. In accordance with 40 CFR Part 63 Subpart KK, an Area Source must comply with the following restrictions:

Facility Usage Limits.

(a) Use less than 10 tons of any single hazardous air pollutant (HAP**),** listed in Section 112 of the Federal Clean Air Act, at this facility, including materials used for source categories or purposes other than Printing and Publishing, for each period of 12 consecutive months,

(b) Use less than 25 tons per each period of 12 consecutive months for any combination of HAP listed in Section 112 of the Federal Clean Air Act at the facility including materials used for source categories or purposes other than printing and publishing.

PROPOSED

These emissions limitation are established pursuant to Division Rule 1200-03-07-.07(2) of the Tennessee Air Pollution Control Regulations and the information contained in the agreement letter from the permittee dated April 10, 2017.

40 CFR 63.820(a)(7)

An area source that exceeds the above facility usage limits (excluding chromium HAP emissions for the reasons as stated above) and becomes a major source and must comply thereafter with all applicable provisions and standards of rule 40 CFR Part 63 Subpart KK beginning with the month after becoming a major source.

40 CFR 63.820(a)(5)

Compliance Method: Compliance with this requirement shall be certified through recordkeeping of HAP usage (with exclusions as specified above). Monthly and 12-consecutive-month HAP usage from this facility (63-0123) shall be calculated and maintained by keeping the following logs. These logs shall be used to assure compliance with this condition and in the reporting requirements of **Condition E2** of this permit. They must be retained for a period of not less than five years.

Table 1. MONTHLY HAP USAGE/EMISSIONS LOG FOR THE FACILITY 63-0123: MONTH/YEAR

HAP Source	HAP_1 Emissions (tons HAP_1 per month)	HAP_p Emissions (tons HAP_p per month)	TOTAL HAP Emissions (tons HAP_1 through HAP_p per month)
63-0123-04 (Condition **E7-1**)	$04HAP_1$	$04HAP_p$	04HAP
63-0123-06 (Condition **E8-1**)	$06HAP_1$	$06HAP_p$	06HAP
63-0123-07 (Condition **E9-1**)	$07HAP_1$	$07HAP_p$	07HAP
63-0123-19 (Condition **E11-1**)	19HAP1	19HAPp	19HAP
63-0123-20 (Condition **E12-1**)	20HAP1	20HAPp	20HAP
All Insignificant Activities (AIA)	$AIAHAP_1$	$AIAHAP_p$	AIAHAP
All Others (AO)	$AOHAP_1$	$AOHAP_p$	AOHAP
TOTAL	$THAP_1$	$THAP_p$	THAP

Note: p = 1, 2, 3,..... n = the number of different hazardous air pollutants. Use columns as required for the number of different hazardous air pollutants.
Note- Volatile HAP Usage will be the same as Volatile HAP emissions, except for sources with control

$THAP_1$ refers to "Total HAP" in terms of tons for the stated time period for the HAP identified as HAP_1

Table 2. YEARLY HAP USAGE /EMISSIONS LOG FOR THE FACILITY 63-0123: YEAR

MONTH/YEAR	HAP1 Emissions (tons HAP1 per month)	(*)HAP_1 Emissions (tons HAP1 per 12 months)	HAP_p Emissions (tons HAP_p per month)	(*)HAP_p Emissions (tons HAP_p per 12 months)	TOTAL HAP Emissions (tons HAP_1 through HAP_p per month)	(*)TOTAL HAP Emissions (tons HAP_1 through HAP_p per 12 months)
July/Year	$THAP_1$	$THAP_112$	$THAP_p$	$THAP_p12$	THAP	THAP12
Aug/Year	$THAP_1$	$THAP_112$	$THAP_p$	$THAP_p12$	THAP	THAP12
Etc.	$THAP_1$	$THAP_112$	$THAP_p$	$THAP_p12$	THAP	THAP12
June/Year	$THAP_1$	$THAP_112$	$THAP_p$	$THAP_p12$	THAP	THAP12

(*) 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 log, this value will be equal to the value for tons per month. For the second month it will be the sum of the first month and the second month. Indicate in parentheses the number of months summed, that is, 6 (2) represents 6 tons used in 2 months.

Where: All Insignificant Activities (AIA) includes volatile HAP emitted by the ink jet printers, the corona treaters, the two proof presses, the metalizer, the press washer, and all tanks that store material containing volatile HAP. All Other (AO) includes any non- printing sources of volatile HAP and any volatile HAP emitted by source 63-0123-02 (boiler/heaters),source 63-0123-16 (two emergency diesel engines), and source 63-0123-21 (thermal oil heater).

All Activities identified as "Insignificant" must still comply with all applicable emission limits.

The HAP emissions, which are to be used in Table 1 and Table 2, may be calculated using the following tables, or by using another procedure which provides the same information. Also, VOC and HAP emissions shall be calculated from the following Tables 3 and 4 or by using another procedure which provides the same information.

Record keeping for processes at this facility shall include a log of the following information (as noted before, due to the fact that chromium emissions are very low, they do not need to be included in this table):

PROPOSED

(1) Emissions in tons of each Hazardous Air Pollutant, (2) Emissions in tons of all Hazardous Air Pollutants and (3) Emissions in tons of VOCS excluding water and/or exempt compounds for all input materials used during all intervals of 12 consecutive months. Logs containing information in the following format or an alternative format providing the same information must be maintained at the source location and kept available for inspection by the Technical Secretary or a Division representative.

The following table **(Table 3)**, or another format providing the same information, may be used for the calculation of monthly VOC and HAP emissions.

Table 3. MONTHLY EMISSIONS LOG MONTH/YEAR:

MATERIAL NAME	USAGE (pounds per month)	VOC CONTENT (pounds VOC per pound of material)	VOC* EMISSIONS (tons VOC per month)	HAP_1 CONTENT (pounds HAP_1 per pound of material)	HAP_1** EMISSIONS (tons HAP_1 per month)	HAP_p CONTENT (pounds HAP_p per pound of material)	HAP_p** EMISSIONS (tons HAP_p per month)	TOTAL HAP EMISSIONS** (tons HAP_1 through HAP_p per month)

* Note that VOC Emissions or HAP emissions from Rotogravure Printing or Ink Preparation may take into consideration control device efficiency or other emission factors, such as loss factors for ink mixing.

** Note: p = 1, 2, 3,..... n = the number of different hazardous air pollutants. Use columns as required for the number of different hazardous air pollutants.

EQUATIONS FOR EMISSIONS LOG CALCULATIONS:

(1) Material VOC Emissions (tons VOC per month)= (Material (pounds per month))(Material VOC Content (pounds VOC per pound of material))/(2000 pounds/ton)
(2) Material HAP Emissions (tons HAP per month)
(3) = (Material (pounds per month))(Material HAP Content (pounds VOC per pound of material))/(2000 pounds/ton)
(4) Note that for Ref. No. 63-0123-04: Ink Preparation Operation and 63-0123-06: Rotogravure Printing Operation, VOC emissions are controlled by a carbon adsorption solvent recovery system. The concentration of HAP's in the VOC emissions is considered to be the same as in the original solvent used at these processes.
(5) Note that for Ref. No. 63-0123-19: Rotogravure Printing Operation with Laminator, VOC emissions are controlled by an RTO. The concentration of HAP's in the VOC emissions is considered to be the same as in the original solvent used at these processes.
(6) Note that for Ref. No. 63-0123-20: Stand-alone Laminator, VOC emissions are controlled by an RTO. The concentration of HAP's in the VOC emissions is considered to be the same as in the original solvent used at these processes.

Record keeping for this surface coating operation shall include a log of the following information:
(1) Emissions in tons of each Hazardous Air Pollutant, (2) Emissions in tons of all Hazardous Air Pollutants and (3) Emissions in tons of VOCS excluding water and/or exempt compounds for all input materials used during all intervals of 12 consecutive months. Logs containing information in the following format or an alternative format approved by the Technical Secretary in writing, must be maintained at the source location and kept available for inspection by the Technical Secretary or a Division representative. These logs must be retained for a period of not less than five years.

The following table **(Table 4)**, or another format providing the same information, may be used for the calculation of hourly VOC emissions for **Condition E7-2** (63-0123-04 Ink Preparation)

Table 4. HOURLY VOC EMISSIONS LOG
ROTOGRAVURE CYLINDER PREPARATION or INK PREPARATION ID _____
For compliance with E7-2 (63-0123-04)

MONTH_____YEAR_____

VOC MONTHLY EMISSIONS (pounds VOC per month)	HOURS of OPERATION per MONTH	VOC EMISSIONS, POUNDS per HOUR

PROPOSED

The monthly average hourly emission rate shall be calculated by dividing the total monthly emissions by the hours of operation for that month.

The following table **(Table 5)** , or another format providing the same information, may be used for the calculation of VOC and HAP emissions over 12-consecutive month intervals.

Table 5. 12-MONTH VOC AND HAP EMISSIONS LOG UNIT ID # _____

MONTH/YEAR	VOC EMISSIONS TONS per MONTH	(*) VOC EMISSIONS TONS per 12 MONTHS	HAP-1 EMISSIONS TONS per MONTH	(*) HAP-1 EMISSIONS TONS per 12 MONTHS	HAP-2 EMISSIONS TONS per MONTH	(*) HAP-2 EMISSIONS TONS per 12 MONTHS	TOTAL HAP EMISSIONS TONS per MONTH	(*) TOTAL HAP EMISSIONS TONS per 12 MONTHS

(*) 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].

PROPOSED

E3-3. VOC/HAP Content Recordkeeping Requirements.

Determinations of the as-supplied volatile organic compounds (VOC) and hazardous air pollutants (HAP) including volatile hazardous air pollutants (VHAP) contents by weight of all VOC and HAP containing materials listed in the approved application for use by sources 63-0123-04, 63-0123-06, 63-0123-07, and 63-0123-19, and 63-0123-20 shall be completed once as follows:

(a) All Coatings, Inks, Adhesives, Thinners, Cleaners, Solvents and Ancillary Materials other than publication rotogravure materials – for each of these materials, the owner or operator shall determine the as-supplied volatile matter content, water content, density, volume solids and weight solids by using EPA Method 24 (one-hour bake) (TAPCR 1200-03-16-.01(5)(g)(24) and 1200-03-18-.81(2)(a)), or the certified results from a manufacturer or vendor EPA Method 24 determination, or the results from an alternative or equivalent method, or the results from formulation data provided by the manufacturer or vendor, or from Material Safety Data Sheets (MSDS), or from Certified Product Data Sheets (CPDS).

(b) All Coatings, Inks, Adhesives, Thinners, Cleaners, Solvents and Ancillary Materials – for each of these materials, the owner or operator shall determine the as-supplied organic HAP weight fraction by using EPA Method 311, or the certified results from a manufacturer or vendor EPA Method 311 determination, or the results from an alternative or equivalent method, or from Material Safety Data Sheets (MSDS), or from Certified Product Data Sheets (CPDS)

Records of the aforementioned determinations along with the certified product data sheets, the material safety data sheets, and the purchase orders and invoices or a record thereof, for all VOC and HAP containing materials shall be maintained and made readily available for inspection by the Technical Secretary or a Division representative. These records must be retained for a period of not less than five years. If new materials are used, or if material formulation is changed, new content determinations shall be made within 90 days from the initial date of usage of the new or altered material.

TAPCR 1200-03-09-.02(11)(e)1.(iii), Construction Permits Numbers 948027P, 948030P, 948029P, 949515P, 948028P, and 977837

E3-4. Not Applicable

E3-5. Not Applicable

E3-6. Visible emissions from this source shall not exhibit greater than twenty percent opacity, except for one six-minute period in any one hour period and for no more than four six-minute periods in any twenty-four hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

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

Compliance Method: The permittee shall assure compliance with the opacity standard by utilizing the opacity matrix dated June 18, 1996, amended September 11, 2013, 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 requirements.

E3-7. MACT –Paper and Other Web Coating

This facility is not subject to 40 CFR PART 63 - Subpart JJJJ—National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating. 40 CFR § 63.3290 states that the provisions of this subpart apply only to each new and existing facility that is a major source of HAP, as defined in 40 CFR §63.2, at which web coating lines are operated. This facility is not a major source of HAP.

E3-8. Compliance Assurance Monitoring

The following processes which are controlled by a common carbon adsorption system to recover VOC's are subject to the provisions of 40 CFR Part 64-Compliance Assurance Monitoring (CAM). The CAM provisions are found in Attachment 2 of this permit. The permittee shall maintain records that indicate compliance with the provisions of this plan.

63-0123-04 Ink Preparation Operation
63-0123-06 Rotogravure Printing Operation

PROPOSED

E3-9. All data, including all required calculations, must be entered in the log no later than 30 days from the end of the month for which the data is required.

E3-10. This source shall comply with all applicable state and federal air pollution control regulations. This includes, but is not limited to, federal regulations published under 40 CFR 63 for sources of hazardous air pollutants and 40 CFR 60, New Source Performance Standards.

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

E3-11. This source shall operate in accordance with the terms of this permit and the information submitted in the approved permit application.

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

SOURCE SPECIFIC EMISSION STANDARDS:

63-0123-02	**Steam Generating Boiler/Heaters** This source is made-up of three natural gas-fired process heater (thermal oil heaters) with rated heat input capacity of 6.0 MM Btu per hour each and one natural gas-fired Cleaver Brooks Boiler with a 21.0 MM Btu per hour heat input rate. No. 2 fuel oil is used as an emergency backup fuel. The earlier existing three process heaters (thermal oil heaters) exhaust to the atmosphere through a single stack that is 125 feet above grade. The Cleaver Brooks boiler exhausts through a stack that is 21 feet above grade. There is no pollution control device. The thermal oil heater's output is used to provide heat for the printing press dryers of source 63-0123-06 and indirect heating for steam and hot water for plant use. The Cleaver Brooks boiler provides steam for regenerating the beds of the carbon adsorption control system of source 63-0123-06. Only the Cleaver Brooks Boiler is subject to NSPS Subpart Dc.

E5. Conditions Specific to Source 63-0123-02.

E5-1. Maximum heat input restrictions.

The stated design heat input rate for this source (63-0123-02) is 6,000,000 Btu per hour individually for all three "existing" process heaters (thermal oil heaters A through C) and 21,000,000 BTU per hour for the Cleaver Brooks Boiler (total of 39.0 MMbtu/hr). Should the permittee need to modify the source(s) in a manner that increases the capacity, a construction permit shall be applied for and received in accordance with TAPCR 1200-03-09-.01 prior to making the change.

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

Compliance Method: The permittee shall maintain documentation to demonstrate the capacity of the source. Documentation may include, but is not limited to, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These Documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

E5-2. Particulate matter (PM) emissions.

PM emitted from this source (63-0123-02) shall not exceed a maximum of 2.10 pounds per hour. This limitation is established pursuant to TAPCR 1200-03-06-.01(7) and an agreement letter dated November 17, 2006.

Compliance Method: Compliance with **Conditions E5-1 and E5-6** and AP-42 Tables 1.3-1, 1.3-2, and 1.4-2 emission factors will assure compliance with this limit.

E5-3. Sulfur dioxide (SO_2) emissions.

SO_2 emitted from this source (63-0123-02) shall not exceed a maximum of 26.7 pounds per hour. This limitation is established pursuant to TAPCR 1200-03-14-.01(3) and an agreement letter dated November 17, 2006.

Compliance Method: Compliance with **Conditions E5-1, E5-4, E5-6,** and AP-42 Tables 1.3-1 and 1.4-2 emission factors will assure compliance with this limit.

PROPOSED

E5-4. **Fuel oil sulfur content restrictions.**

The sulfur content of the No. 2 fuel oil used by this source (63-0123-02) shall not exceed 0.5%, by weight.

TAPCR 1200-03-09-.03(8) and NSPS 40 CFR §60.42c(d) for Cleaver Brooks Boiler

Compliance Method: The permittee shall obtain and maintain certifications from the fuel supplier for each shipment of No. 2 fuel oil or vendor's certification statement for all shipments received that the sulfur content by weight is ≤ 0.5%. These certifications shall be used to certify compliance with this Condition and must be retained for a period of not less than five years. Alternately, the vendor may supply a statement to the effect that all No. 2 fuel oil provided will contain no more than 0.5% sulfur by weight. Reports and certifications shall be submitted in accordance with **Condition E2** of this permit.

E5-5. No. 2 fuel oil for the Cleaver Brooks Boiler shall not exceed 500,000 gallons per consecutive 12-month period.

TAPCR 1200-03-14-.01(3) and an agreement letter dated November 17, 2006.

Compliance Method: Compliance with this condition shall be assured through recordkeeping of fuel usage as required in the table below in **Condition E5-8** (Table 6) or another table providing the same information.

E5-6. **Fuel Type restrictions.**

Only natural gas and number 2 fuel oil shall be used as fuel for this source (63-0123-02).

Compliance Method: The permittee shall certify compliance with this requirement annually in accordance with **Condition E2.(b)** of this permit.

E5-7. The permittee has stated that the boiler at this source meets the definition of "gas-fired boilers," and the thermal oil heaters meet the definition of "process heaters" as specified at 40 CFR 63 § 63.11195. Therefore, the provisions of Subpart JJJJJJ—National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources do not apply to these units.

The Cleaver Brooks Boiler (21.0 MMBtu per hour) shall only use No. 2 fuel oil during periods of gas curtailment, gas supply interruption, startups, or for periodic testing, maintenance, or operator training on liquid fuel. Periodic testing, maintenance, or operator training on liquid fuel shall not exceed a combined total of 48 hours during any calendar year.

E5-8. This sources is subject to and shall comply with the applicable requirements of 40 CFR 60 Subpart Dc – Standards of Performance for small Industrial-Commercial-Institutional Steam Generating Units (Subpart Dc). Pursuant to 40 CFR §60.40c(a), the affected facility to which Subpart Dc applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989, and that has a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than or equal to 10 MMBtu/hr. Per §60.41c, a steam generating unit is defined, in part, as a device that combusts any fuel and produces steam or heats water or any heat transfer medium.

TAPCR 0400-30-39-.01(1)

Compliance Method: Compliance with this condition is assured by compliance with the requirements of **Conditions F2-2** through **F2-4A** log of the amount of each fuel (natural gas or No. 2 fuel oil) combusted each month at the Cleaver Brooks Boiler (21.0 MMBtu per hour) must be maintained at the source location and kept available for inspection by the Technical Secretary or a Division representative. The source shall be subject to the reporting and recordkeeping requirements of 40 CFR Part 60, Subpart Dc, Volume 55, No. 177, dated September 12, 1990. This log must be retained for a period of not less than five years. All data, including all required calculations, must be entered in the log no later than 30 days from the end of the month for which the data is required. 40 CFR § 60.48c (g)

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

Table 6 No. 2 Fuel Oil Usage for the Cleaver Brooks Boiler Year:

Month	Gallons of No. 2 Fuel Oil used per Month	Gallons of No. 2 Fuel Oil used per consecutive 12-month period	Cubic Feet of Natural Gas used per Month	Hours Operated	Rationale for No. 2 Fuel Oil usage
January					
February					

PROPOSED

Total per Calendar Year					

All data, including all required calculations, must be entered in the log no later than 30 days from the end of the month for which the data is required.

E5-9. The nitrogen oxides (NO_x) emissions from the 21.0 MMBtu per hour Cleaver Brooks Boiler shall not exceed the following rates:

Fuel	Allowable Low-NO_x emission requirement	Allowable NO_x emission rate
No. 2 Fuel Oil	16 pounds NO_x per thousand gallons of No. 2 oil (80% of AP-42 table 1.3-1 value of 20 pounds per 1000 gallons)	2.40 pounds per hour
Natural Gas	50 pounds NO_x per million cubic feet of natural gas (AP-42 Table 1.4-1 Controlled low-NOx burners)	1.05 pounds per hour

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

Compliance Method: The permittee has specified that this unit is equipped with Low-NO_x burners and Flue Gas Recirculation; this source shall not be operated unless the Low-NO_x burner and Flue Gas Recirculation features are fully operational. Documentation from the manufacturer for this unit which specifies that these features are present and which also provides NO_x emission factors shall be maintained onsite and shall be made available to the Technical Secretary or a Division representative.

63-0123-04	**Ink Preparation Operation** The Ink Preparation Operation is made-up of: 16 ink, varnish and solvent storage tanks of various sizes; a preparation area for the handling of press-ready inks and the handling, thinning and blending of non-press-ready inks. Totes of inks and solvents are brought into the Ink Room and transferred to the ink/solvent tanks. Waste solvent/ink goes to three evaporators and a wet venturi scrubber to remove PM from exhaust stream. The wet venturi scrubber exhausts to the Carbon Adsorption System associated with source 63-0123-06. There are no exhaust stacks for this operation or emissions other than those collected by the three evaporators in the preparation area.

E7. Conditions Specific to Source 63-0123-04.

E7-1. Recordkeeping requirements.

The recordkeeping requirements for this source (63-0123-04) shall include:

(a) Records of the monthly solvent (VOC) component of the materials' usage rate (pounds per month) and the monthly source operating hours (hours per month). The volatile organic compounds (VOC) emissions in pounds per hour on a monthly average basis shall be calculated in accordance with the two percent specification of **Condition E7-2** of this permit and recorded.

(b) Records of the monthly hazardous air pollutants (HAP) usage/emissions (tons per month).

(c) The records required by **Conditions E3-2, E7-2, and E7-3** of this permit. Also, this information shall be included as specified in **Condition E8-1** of this permit.

(d) Any records required by paragraph 40 CFR §63.829 of 40 CFR Part 63 Subpart KK that are not referenced by paragraphs (a) through (c) above.

These records shall be used to assure compliance with this Condition and **Conditions E7-2 and E7-3** of this permit, and in the reporting requirements of **Condition E2** of this permit, and must be retained for a period of not less than five years.

TAPCR 1200-03-09-.02(11)(e)1.(iii) and Construction Permit Number 948029P TAPCR 1200-03-10-.02(2)(a)

PROPOSED

E7-2 Volatile Organic Compounds (VOC) emission.

VOC emitted from this source (63-0123-04) shall not exceed a maximum of 8.0 pounds per hour based on a monthly averaging basis.

TAPCR 1200-03-09-.01(4) and Construction Permit Number 948029P

Compliance Method: Compliance with this emission limitation shall be assured through recordkeeping of the process solvent usage rates and operating parameters, and by operating the pollution control equipment in accordance with **Condition E7-3** of this permit. Additionally, the overall VOC emitted (both process plus fugitive and controlled and uncontrolled) has been established to be two percent of the VOC components contained in the materials used as provided in the original PSD-LAER determination of February 9, 1987 for this source (63-0123-04). Records required by **Condition E7-1** and Table 4 of **Condition E3-2** of this permit shall be used to certify compliance with this Condition and in the reporting requirements of **Condition E2** of this permit.

E7-3. Air Pollution Control Equipment requirements.

Pollution Control Equipment (a wet venturi scrubber followed by a carbon adsorption system) used by this source (63-0123-04) shall be operating when this source is operating, except in accordance with TAPCD Rule 1200-03-20, in order to comply with the emissions limitation of **Condition E7-2** of this permit. A monthly log of maintenance and problems/repair actions and dates shall be kept for this control equipment. This log must be retained for a period of not less than five years.

63-0123-06 **Rotogravure Printing Operation** This source is comprised of the following equipment:

(a) Unprinted paper preparation-rolls of white paper are either used directly for printing or are varnished, metalized and trimmed by slitters prior to printing. Emissions are exhausted through two 25 feet high stacks and one 20 feet high stack. There are some fugitive emissions.

(b) Rotogravure printing press number 1 that has nine printing stations. Emissions are exhausted to a solvent recovery system when solvent-based inks are used. Emissions are vented directly to the atmosphere through bypass stacks when water-based coatings are used. There are some fugitive emissions. Corona treaters are used to help ink adhere to metalized paper.

(c) Rotogravure printing press number 2 that has ten printing stations. Emissions are exhausted to a solvent recovery system. There are some fugitive emissions. Corona treaters are used to help ink adhere to metalized paper.

(d) Two proof presses and a cylinder wash tank are used in conjunction with the Rotogravure presses. Emissions are fugitive.

(e) A control system made-up of a capture system and a carbon adsorption control device to collect emissions and recover solvent from the rotogravure printing presses, the cylinder wash tank and the three evaporators and wet venturi scrubber of source 63-0123-04. Note that the wet venturi scrubber does not eliminate gaseous (VOC) emissions. Emissions are exhausted through a 39 feet high stack. Four (7,500 gallon each) above ground tanks are used to store recovered solvent.

(f) Printed-paper preparation-rolls and sheets of paper are cut as required, bundled, coded by ink jet printers as required, and packaged for shipment.

E8. Conditions Specific to Source 63-0123-06.

E8-1. Recordkeeping requirements for source 63-0123-06

The recordkeeping requirements for this source (63-0123-06) shall include:

(a) Records of the monthly: usage rate (gallons or pounds per month), volatile organic compounds (VOC) usage (tons per month), VOC recovered (tons per month) by the control system, VOC emissions (tons per month), and hazardous air pollutants (HAP) used (tons per month). For the purpose of this recordkeeping, the mass fraction of organic HAP present in the recovered volatile matter is assumed to be equal to the mass fraction of organic HAP present in the volatile matter used. The overall VOC control efficiency in percent on a monthly average basis shall be calculated using the following equation and recorded.

$\eta_{OVERALL} = 100 * [1.0 - (VOCU - VOCR)/VOCU]$ = overall VOC control efficiency in percent on a monthly average basis

PROPOSED

Where: VOCU = monthly VOC usage (tons per month) for all solvent based input material.
VOCR = monthly solvent VOC recovered (tons per month) for all solvent based input material.

For purposes of calculating the monthly VOC emissions and the overall VOC control efficiency, the following definitions will be used. Also, additional information is included to explain the basis for calculations.

"Monthly VOC usage" shall include all VOC contained in the ink which is used each month and the solvent which is dispensed each month. The monthly VOC usage includes all of the solvent based input material used at the Rotogravure Printing Process. This material may have been processed through the "Ink Preparation Operation"- Ref. No. 63-01230-04. For the material processed at the Ink Preparation Operation, there will be a 2% reduction in VOC solvent material from the VOC input at the Ink Preparation process to the input at Rotogravure Printing, based on the 2% loss factor specified in **Condition E7-2** of this permit.
Monthly VOC emissions from water-based materials that are not controlled by the carbon adsorption system shall be quantified and included with the monthly VOC emissions, but will not be included with the calculations for overall VOC control efficiency.

The amount of VOC contained in the "Press-Ready" (unused) ink at the end of each month will be quantified and subtracted from the "monthly VOC usage" value, and will not be included in the monthly VOC emissions or the calculations for VOC control efficiency. This is based upon the "Press Ready" ink having been considered in the Monthly "VOC Input" for the month of concern.

The material that is removed from the wash tanks and the sumps is transported to the evaporators. After evaporation, the sludge is shipped offsite to a treatment, disposal, and storage facility. The VOC present in the material shipped offsite may be subtracted from the "monthly VOC usage" rate, and is not counted as "Monthly VOC emissions" and is not counted as part of overall VOC control efficiency calculations.

VOC emissions from materials controlled by the carbon adsorption system shall be calculated by subtracting the monthly VOC collected by the recovery system from "monthly VOC usage."

Consideration of "Ink Preparation Operation" (Ref. No. 63-0123-04)

Only some of the ink and solvent which is used at this facility is processed through this "Ink Preparation Operation." For those materials which <u>are</u> processed at this source, the total VOC monthly throughput is multiplied by 2% to determine VOC emissions. This value is then used to determine compliance with the 8.0 lb/hr monthly average VOC emission limit (**Condition E7-2**). This amount of VOC is subtracted from the input VOC used to determine VOC control efficiency (**Condition E8-1** of this permit) and the VOC emissions (296.8 tons/year limit at **Condition E8-2** of this permit).

(b) Records of the monthly cumulative: VOC emissions (tons per month) and HAP emissions (tons per month) of each CAS number for all input material used at all presses.

(c) Records of the 12 consecutive months cumulative VOC emissions (tons per month) for all input material used at this source and at source 63-0123-04. The tons per 12 consecutive month value is the sum of the VOC emissions in the 11 months preceding the month just completed plus the VOC emissions in the month just completed.

(d) The records required by **Conditions E3-2, E8-2 and E8-3** of this permit.

(e) Any records required by paragraph 40 CFR §63.829 of 40 CFR Part 63 Subpart KK that are not referenced by paragraphs (a) through (d) above. For purposed of the HAP usage records required by **Condition E3-2**, only HAP usage (and not emissions) is required.

These records shall be used to certify compliance with this condition, **Conditions E8-2 and E8-3** of this permit, and in the reporting requirements of **Condition E2** of this permit.

TAPCR 1200-03-09-.02(11)(e)1.(iii), TAPCR 1200-03-18-35(7)(d) and, Construction Permit Numbers 948028P and 949515P

E8-2. <u>Volatile Organic Compounds (VOC) emissions.</u>

The VOC emitted from this source (63-0123-06) shall not exceed a total of 296.8 tons during all intervals of 12 consecutive months.

TAPCR 1200-03-07-.07(2) and 1200-03-18-.35(5)(a)2(ii)

Compliance Method: Compliance with this emission limitation shall be assured through recordkeeping of the process input material usage rates and recovery rates and, by operating the pollution control equipment in accordance with **Condition**

PROPOSED

E8-3 of this permit. Records required by **Conditions E8-1** of this permit shall be used to certify compliance with this condition and in the reporting requirements of **Condition E2** of this permit.

E8-3. Overall VOC control efficiency requirements.

The overall VOC control efficiency for this source (63-0123-06) shall not be less than 74 percent (monthly average basis). Coatings and inks that are not solvent-based (water-based) used at this source (63-0123-06) may be excluded from meeting the 74% control efficiency as provided in Permit Number 948028P. Based on the regulatory definition, the facility is categorized as a packaging rotogravure printing press as specified at 1200-03-18-.35(2)(b).

This process (including the printing unit and carbon adsorber) shall comply with all applicable provisions of 1200-03-18-.03 Compliance Certification, Recordkeeping, and Reporting Requirements for Coating and Printing Sources).

This process is subject to 1200-03-18-.35 Graphic Arts Systems and must comply with all requirements in that rule. Note that construction permit 9C7248P has set a minimum control efficiency of 74%, which will take precedence over the 65 % minimum control efficiency for a "Packaging Rotogravure Printing Press" found at 1200-03-18-.35(5)(2)(ii).

TAPCR 1200-03-18-.35(2)(b)

Compliance Method: Compliance with this control efficiency requirement shall be assured through recordkeeping of the materials used by the rotogravure printing presses and the solvent recovered by the control system. Coatings and inks consisting of 35% or more water are defined as materials that are not solvent based as provided in Permit Number 948028P. Records required by **Condition E8-1** of this permit shall be used to certify compliance with this condition and in the reporting requirements of **Condition E2** of this permit.

63-0123-07	**Varnish Coating Operation** This source is a varnish coating operation where rolls of white paper are varnished and metalized prior to use in the printing operation. In preparation for metalizing, rolls of paper are unwound, coated with a waterbased ammonium hydroxide varnish, and then passed through dryers and rewound. The varnished paper is routed to the Metalizer. (Note – this process is not subject to 1200-03-18-.35 Graphic Arts Systems)

E9-1. Recordkeeping requirements for source 63-0123-07.

The recordkeeping requirements for this source (63-0123-07) shall include:

(a) Records of the monthly: usage rate (gallons or pounds per month) for each input material, volatile organic compounds (VOC) content (pounds VOC per gallon), VOC emissions (tons per month), and hazardous air pollutants (HAP) emissions (tons per month).
(b) Records of the 12 consecutive months cumulative VOC emissions at this source. The tons per 12 consecutive month value is the sum of the VOC emissions in the 11 months preceding the month just completed plus the VOC emissions in the month just completed.
(c) The records required by **Conditions E3-2 and E3-3** of this permit.

These records shall be used to assure compliance with **Condition E9-2** of this permit, and in the reporting requirements of **Condition E2** of this permit.

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

E9-2. Volatile Organic Compounds

Volatile organic compounds (VOC) emitted from this source (63-0123-07) shall not exceed 14.0 tons during any period of 12 consecutive months.

TAPCR 1200-03-7-.07(2)

Compliance Method: Compliance with this emission limitation shall be assured through recordkeeping of the process input material usage rates. Records required by **Condition E9-1** of this permit shall be used to certify compliance with this condition and the reporting requirements of **Condition E2.**

PROPOSED

63-0123-16	**One Emergency Generator Engine (60 HP) and One Emergency Fire Pump Engine (300 HP)** These units are subject to the MACT Subpart ZZZZ-Reciprocating Internal Combustion Engines as noted in **Condition E10-1.** There is no control for either unit. Both units were constructed before the applicability date for NSPS Subpart IIII Stationary Compression Ignition Internal Combustion Engines rule.

E10. Conditions Specific to Source 63-0123-16.

E10-1. Stationary Reciprocating Internal Combustion Engines (RICE) as defined in 40 CFR §63.6585(a) are subject to National Emissions Standards for Hazardous Air Pollutants (NESHAPS), 40 CFR Part 63, Subpart ZZZZ, including any and/or all applicable emission limitations, notifications, compliance options, records, reports, etc., including, but not limited to the requirements as referenced in the following conditions. This facility is currently designated as an area source of Hazardous Air Pollutants (HAPs) as defined in 40 CFR §63.6585(c) of subpart ZZZZ. Pursuant to 40 CFR §63.6590(a)(1) and 40 CFR §63.6595(a)(1), this affected source (which is an existing stationary RICE) must meet the requirements of subpart ZZZZ.

E10-2. Only diesel fuel shall be used as fuel for the emergency engine(s).

E10-3. For each emergency stationary compression ignition RICE, the permittee shall:

(a) Change oil and filter every 500 hours of operation or annually, whichever comes first; however, the permittee has the option to utilize an oil analysis program as described in 40 CFR §63.6625(i) in order to extend the specified oil change requirement.

(b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and

(c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable.

40 CFR §63.6603(a)

E10-4. The permittee must be in compliance with the applicable emission limitations, operating limitations, and other requirements in Subpart ZZZZ at all times. The permittee must at all times operate and maintain the emergency stationary RICE, including associated air pollution control equipment and monitoring equipment (if present), in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee 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 Technical Secretary which 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 §63.6605(b)

E10-5. The permittee must at all times operate and maintain the emergency stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or the permittee must develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

40 CFR §63.6625(e)(3)

E10-6. The permittee must install a non-resettable hour meter if one is not already installed.

40 CFR §63.6625(f)

PROPOSED

E10-7. The permittee must minimize each engine's time spent at idle during startup and minimize each engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup apply.

40 CFR §63.6625(h)

E10-8. The permittee must operate each emergency stationary RICE according to the requirements in (a) through (c) of this condition in order for the engines to be considered emergency stationary RICE under subpart ZZZZ. Any operation other than emergency operation, maintenance and testing, and operation in nonemergency situations for 50 hours per year, as described in (a) through (c) of this condition, is prohibited. If any engine is not operated according to the requirements in (a) through (c) of this condition, the engine will not be considered an emergency engine under subpart ZZZZ and must meet all requirements for non-emergency engines.

(a) There is no time limit on the use of emergency stationary RICE in emergency situations.

(b) The permittee may operate each emergency stationary RICE for any combination of the purposes specified in (i) below for a maximum of 100 hours per calendar year. Any operation for non-emergency situations defined by (c) below counts as part of the 100 hours per calendar year.

(i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Technical Secretary for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.

(c) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in (b) above. Except as provided below, the 50 hours per year for nonemergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for the facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity

(i) The 50 hours per year for nonemergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

A. The engine is dispatched by the local balancing authority or local transmission and distribution system operator.
B. The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
C. The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
D. The power is provided only to the facility itself or to support the local transmission and distribution system.
E. The permittee identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

40 CFR §63.6640(f)

E10-9. Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in subpart ZZZZ in the semiannual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 7 of subpart ZZZZ along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any emission or operating limitation in this subpart, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority.

40 CFR §63.6650(f)

PROPOSED

E10-10. The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the engine and after-treatment control device (if any) were operated and maintained according to the maintenance plan.

40 CFR §63.6655(e)

E10-11. If the emergency stationary RICE does not meet the standards that are applicable to non-emergency engines, the permittee must keep records of the hours of operation of the emergency engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purposes specified in **Condition E10-8(c)(i)**, the permittee must keep records of the notification of the emergency situation, and the date, start time, and end time of the engine operated for these purposes.

40 CFR §63.6655(f)

E10-12. Pursuant to 40 CFR §63.6655(f), the permittee shall keep a log of the number of operating hours recorded through the non-resettable hour meter for each calendar year, in a form that readily demonstrates compliance with **Condition E10-8** (see example below). All data, including all required calculations, must be entered in the log no later than thirty days from the end of the year for which the data is required. The permittee shall retain this record at the source location for a period of not less than five years and keep this record available for inspection by the Technical Secretary or a Division representative.

Year:				
	Operating Hours per Month			**Comments****
Month	**Maintenance checks & readiness testing**	**Other non-emergency operation**	**Emergency operation**	
January				
February				
March				
April				
May				
June				
July				
August				
September				
October				
November				
December				
Totals				
** The permittee must document how many hours are spent for emergency operation; including what classified the operation as emergency and how many hours are spent for non-emergency operation. Additionally, the permittee must also keep records of the notification of the emergency situation, document the date, start time, and end time if/when the engine is operated for any of the purposes specified in **Conditions E10-8.**				

The above information shall be used with AP-42 emission factors to determine those emission values as required for **Condition E3-2**.

Engine General Conditions

E10-13. The stated design power output capacities for these internal combustion engines are 60 HP and 300 HP. Should the permittee need to modify the source(s) in a manner that increases the capacity, a construction permit shall be applied for and received in accordance with TAPCR 1200-03-09-.01 prior to making the change.

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

Compliance Method: The permittee shall maintain documentation to demonstrate the capacity of the source(s). Documentation may include, but is not limited to, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

E10-14. Nitrogen oxides (NO_x) emitted from this source shall not exceed a total of 11.16 lbs/hr.

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

PROPOSED

Compliance Method: Compliance with these limits shall be assured by compliance with **Conditions E10-2 and E10-13.**

E10-15. Carbon monoxide (CO) emitted from this source shall not exceed 2.40 lbs/hr.

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

Compliance Method: Compliance with this limitation shall be assured by compliance with **Conditions E10-2 and E10-13.**

E10-16. Particulate matter emitted from this source shall not exceed 0.6 pounds per million British Thermal Units heat input (approx.. 1.51 lbs/hr, combined).

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

Compliance Method: Compliance with this emission limit shall be assured by compliance with **Conditions E10-2 and E10-13.**

E10-17. Sulfur dioxide (SO_2) emitted from this source shall not exceed 0.74 lbs/hr.

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

Compliance Method: Compliance with this limitation shall be assured by compliance with **Conditions E10-2 and E10-13.**

E10-18. The sulfur content of the diesel fuel shall not exceed 0.5 percent by weight.

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

Compliance Method: The permittee shall either obtain certification from the fuel oil supplier of the sulfur content (by weight) for each shipment of fuel oil, or alternatively, obtain an annual statement from each fuel vendor that guarantees in advance that all fuel oil shipments will contain no more than 0.5 percent sulfur by weight. This record shall be kept available for inspection by the Technical Secretary or a Division representative and be retained for a period of not less than five years.

E10-19. Routine maintenance, as required to maintain specified emission limits, shall be performed on the engine. Maintenance records 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.

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

63-0123-19	**10-Color Rotogravure Printing Operation, Laminator, and Cylinder Wash Tank. Emissions are Regenerative Thermal Oxidizer controlled (RTO - 2.295 MMBtu/hr Natural Gas-Fired). Corona treaters are used to help ink adhere to the substrate.**

E11. <u>Conditions Specific to Source 63-0123-19.</u>

E11-1. Volatile organic compounds (VOC) emitted from this source shall not exceed 25.44 tons during any period of twelve consecutive months. This emission limitation is established pursuant to TAPCR 1200-03-07-.01(5) and the approved permit application dated February 28, 2020, from the permittee for the purpose of PSD avoidance as set in permit 977937.

VOC emissions from this source shall be determined by calculating the monthly VOC emissions that are generated from the raw process input material and multiplying this by (1 - overall removal efficiency of the capture and control device). The values from the most recent test that was observed and accepted by the Division shall be used. If 100% capture is claimed, this shall be assured by meeting the requirements of permanent total enclosure (PTE), otherwise a capture efficiency determination must be made. The overall removal efficiency value shall be verified by source testing of the RTO and any capture efficiency testing, if PTE is not satisfied. The capture system and control device shall be operated at all times when the printing line is actively applying coating to a substrate. For all VOC material including cleanup solvents that are not routed to the RTO, such VOC emissions shall be accounted for and added as uncontrolled emissions to the total facility wide VOC emissions.

Compliance Method: Compliance with this condition is demonstrated by recordkeeping as required by **Condition E3-2**.

PROPOSED

E11-2. This source shall not be operated unless the RTO control equipment is in operation. The permittee shall continuously monitor and record (i.e., a minimum of once every fifteen minutes) the RTO combustion chamber temperature using a thermocouple during the operation of source 19. The RTO shall be operated with a minimum combustion chamber temperature of 1485°F averaged over a three-hour block period. This requirement is based on the results of the most recent capture efficiency and destruction efficiency testing of the RTO on June 17, 2021. The first three-hour block period of each day begins at 12:00 midnight and ends at 2:59 am. The second three-hour block period of each day begins at 3:00 am and ends at 5:59 am, etc. and continues in that sequence throughout the day.

TAPCR 1200-03-09-.03(8) and TAPCR 1200-03-07-.07(2)

Compliance Method: Compliance with the above minimum combustion chamber temperature requirement and all permanent total enclosure criteria shall assure an overall VOC destruction efficiency of 97.4% as indicated by the results of the most recent performance testing of the RTO on June 17, 2021. Any deviations from the RTO's minimum combustion chamber temperature requirement (three-hour block data averaging basis) during which the average temperature is more than 50ºF below the minimum combustion chamber temperature of 1485°F shall be recorded in a deviation log within seven days of the incident. An explanation of the cause of the incident and the corrective action taken shall be included in the deviation log. The combustion chamber temperature shall be recorded in either electronic or manual format. Manual format records shall also include the initials of the person performing the readings, along with the date, time, and any relevant comments. Times that the source is not in operation shall be noted. These records shall be retained in accordance with **Condition E3-2**. The enclosure in which this source operates shall meet the criteria below to meet the requirements for permanent total enclosure in which this source operates shall meet the criteria below to meet the requirements of permanent total enclosure and to assure that 100% of the VOC emissions are being captured and sent to the control device.

(a) Any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Administrator. An NDO is any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct in which a fan is installed;
(b) The total area of all NDO's shall not exceed 5% of the surface area of the enclosure's four walls, floor, and ceiling;
(c) The average facial velocity of air through all NDO's shall be at least 200 feet per minute. The direction of air flow through all NDO's shall be into the enclosure.
(d) All access doors and windows whose areas are not included in item (b) and are not included in the calculation in item (c) shall be closed during routine operation of the process.

63-0123-20	**Stand-alone Laminator - Emissions are Regenerative Thermal Oxidizer controlled (RTO - 2.295 MMBtu/hr Natural Gas-Fired)**

E12. <u>Conditions Specific to Source 63-0123-20.</u>

E12-1. Volatile organic compounds (VOC) emitted from this source shall not exceed 13.58 tons during any period of twelve consecutive months.

VOC emissions from this source shall be determined by calculating the monthly VOC emissions that are generated from the raw process input material and multiplying this by (1 - overall removal efficiency of the capture and control device). The values from the most recent test that was observed and accepted by the Division shall be used. If 100% capture is claimed, this shall be assured by meeting the requirements of permanent total enclosure (PTE), otherwise a capture efficiency determination must be made. The overall removal efficiency value shall be verified by source testing of the RTO and any capture efficiency testing, if PTE is not satisfied. The capture system and control device shall be operated at all times when the printing line is actively applying coating to a substrate. For all VOC material including cleanup solvents that are not routed to the RTO, such VOC emissions shall be accounted for and added as uncontrolled emissions to the total facility wide VOC emissions.

TAPCR 1200-03-07-.01-(5) and the approved permit application dated February 28, 2020, from the permittee for the purpose of PSD avoidance as set in permit 977937.

Compliance Method: Compliance with this condition is demonstrated by recordkeeping as required by **Condition E3-2**.

E12-2. This source shall not be operated unless the RTO control equipment is in operation. The permittee shall continuously monitor and record (i.e., a minimum of once every fifteen minutes) the RTO combustion chamber temperature using a thermocouple during the operation of source 20. The RTO shall be operated with a minimum combustion chamber temperature of 1485ºF averaged over a three-hour block period. This requirement is based on the results of the most recent capture efficiency and

PROPOSED

destruction efficiency testing of the RTO on June 17, 2021. The first three-hour block period of each day begins at 12:00 midnight and ends at 2:59 am. The second three-hour block period of each day begins at 3:00 am and ends at 5:59 am, etc. and continues in that sequence throughout the day.

TAPCR 1200-03-09-.03(8) and TAPCR 1200-03-07-.07(2)

Compliance Method: Compliance with the above minimum combustion chamber temperature requirement and all permanent total enclosure criteria shall assure an overall VOC destruction efficiency of 97.4% as indicated by the results of the most recent performance testing of the RTO on June 17, 2021. Any deviations from the RTO's minimum combustion chamber temperature requirement (three-hour block data averaging basis) during which the average temperature is more than 50ºF below the minimum combustion chamber temperature of 1485°F shall be recorded in a deviation log within seven days of the incident. An explanation of the cause of the incident and the corrective action taken shall be included in the deviation log. The combustion chamber temperature shall be recorded in either electronic or manual format. Manual format records shall also include the initials of the person performing the readings, along with the date, time, and any relevant comments. Times that the source is not in operation shall be noted. These records shall be retained in accordance with **Condition E3-2**. The enclosure in which this source operates shall meet the criteria below to meet the requirements for permanent total enclosure in which this source operates shall meet the criteria below to meet the requirements of permanent total enclosure and to assure that 100% of the VOC emissions are being captured and sent to the control device.

(a) Any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Administrator. An NDO is any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct in which a fan is installed;
(b) The total area of all NDO's shall not exceed 5% of the surface area of the enclosure's four walls, floor, and ceiling;
(c) The average facial velocity of air through all NDO's shall be at least 200 feet per minute. The direction of air flow through all NDO's shall be into the enclosure.
(d) All access doors and windows whose areas are not included in item (b) and are not included in the calculation in item (c) shall be closed during routine operation of the process.

END OF PERMIT NUMBER: 579783

PROPOSED

ATTACHMENT 1

OPACITY MATRIX DECISION TREE for VISIBLE EMISSION EVALUATION EPA METHOD 9 dated June 18, 1996 and amended September 11, 2013

PROPOSED

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, SO_2, 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.

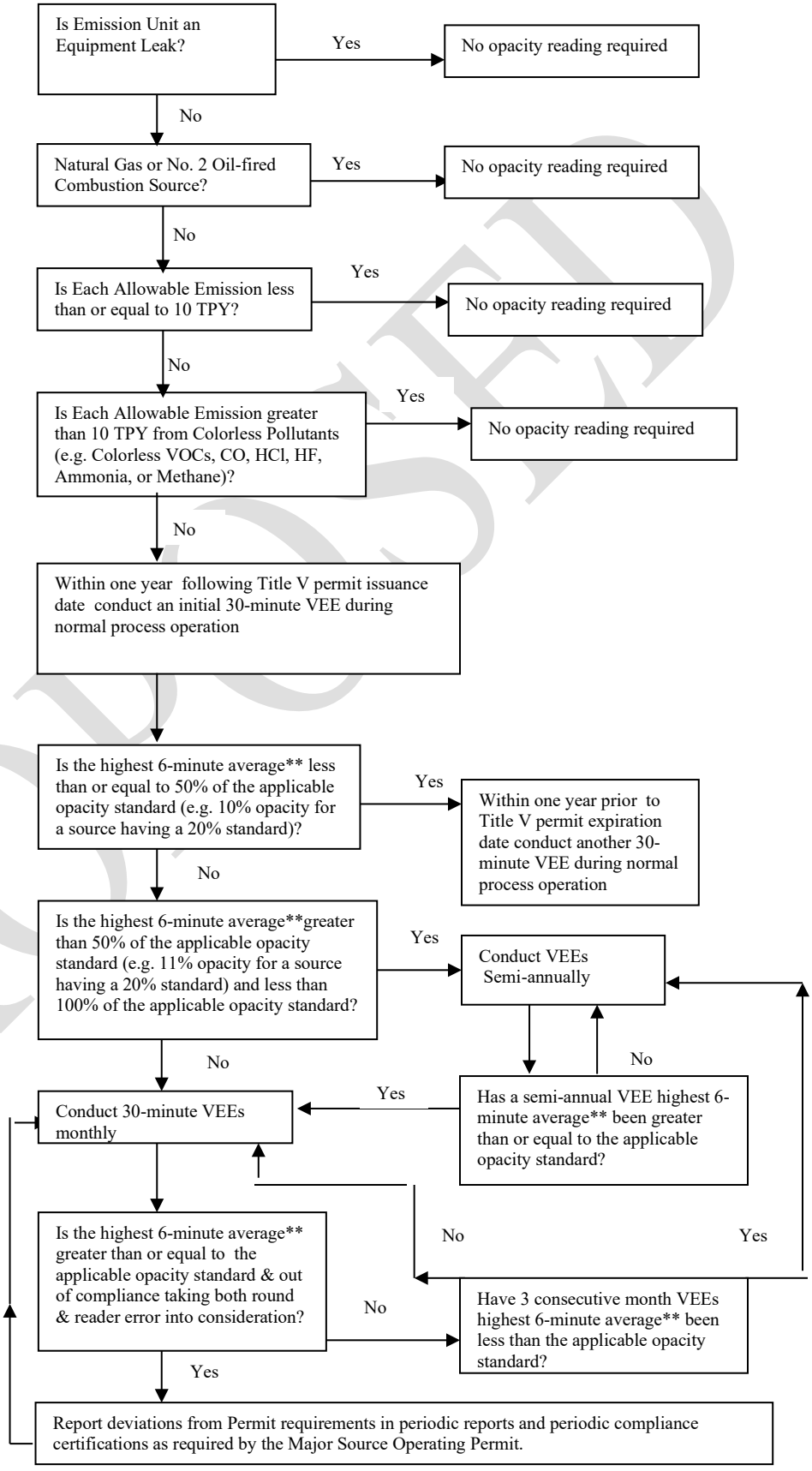
Reader Error
EPA Method 9, Non-NSPS or NESHAPS stipulated opacity standards:
The TAPCD guidance is to declares non-compliance when the highest six-minute average** exceeds the standard plus 6.8% opacity (e.g. 26.8% for a 20% standard).

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

COMPLIANCE ASSURANCE MONITORING

PROPOSED

COMPLIANCE ASSURANCE MONITORING PLAN
ROTOGRAVURE PRINTING OPERATION
SOLVENT RECOVERY SYSTEM

I. BACKGROUND

a. Emission Unit

i. Description: Rotogravure Printing Operation

ii. Identification: Emission Source 63-0123-06

iii. Facility: Precision Printing and Packaging, Inc. dba Constantia Flexibles–Labels Division:
801 Alfred Thun Road
Clarksville, Tennessee 37040-9373

b. *Applicable Regulation, Emission Limits, and Monitoring Requirements*

i. Applicable Requirement: Condition E8-2 TAPCR 1200-03-07-.07(2)

ii. Emission Limits:
Volatile Organic Compounds: Maximum VOC emissions of 296.8 tons/year for all intervals of 12 consecutive months

iii. Monitoring requirements: Monthly evaluation of VOC emissions

c. Control Technology

A control system consisting of a capture system and a carbon adsorption control device is used to control volatile organic compound (VOC) and organic hazardous air pollutant (HAP) emissions by collecting emissions and recovering solvent from the rotogravure printing presses and related sources, including the cylinder wash tank, and the three evaporators/wet scrubber of Emission Source 63-0123-04, Ink Preparation Operations. The VOC control efficiency is required to be 74% or greater by Permit No. 547842, Condition E8-3. Coatings and inks that are water-based (consisting of 35% or more water) may be excluded from meeting the 74% control efficiency.

II. Monitoring Approach

Spear proposes that the following monitoring approach be considered acceptable:

- Quantify the recovered solvent and conduct a liquid-liquid material balance.

As required by 40 CFR 63 Subpart KK, National Emission Standards for the Printing and Publishing Industry, a liquid-liquid material balance is conducted on a monthly basis to ensure that the facility remains an area source for HAPs under the maximum achievable control technology (MACT) standard. The liquid-liquid material balance procedures of 40 CFR 63.825(c)(1) are followed for both VOC and HAPs. Compliance is certified through recordkeeping of VOC usage as required by Condition E8-1 and recordkeeping of HAP usage as required by 40 CFR 63.829(d).

The key elements of the solvent recovery system monitoring approach are presented in Table 1 below. The selected indicator is recordkeeping.

PROPOSED

Table 1. Solvent Recovery System Monitoring Approach

	Indicator No. 1
a. Indicator i. Type ii. Measurement Approach	Recordkeeping Conduct a liquid-liquid material balance on a monthly basis according to the requirements in Condition E8-1
b. Indicator Range i. Indicator Level ii. QIP Threshold	Not applicable (NA) NA
c. Performance Criteria i. Data Representativeness ii. Verification of Operational Status iii. QA/QC Practices and Criteria iv. Monitoring Frequency (a) Data Collection Procedures (b) Averaging Period	 NA NA NA Monthly As described in Condition E8-1 and 40 CFR 63.829(d) NA

PROPOSED

III. MONITORING APPROACH JUSTIFICATION

a. Background

Precision Printing and Packaging, Inc. dba Constantia Flexibles–Labels Division: operates a commercial rotogravure printing facility in Clarksville, Tennessee. The facility includes Rotogravure Printing Press No. 1 (Cerutti) with nine printing stations and Rotogravure Printing Press No. 2 (Rotomec) with ten printing stations. A solvent recovery system consisting of a capture system and a carbon adsorption control device is used to control VOC and HAP emissions from the rotogravure printing presses and related sources.

"This monitoring protocol is applicable to solvent recovery systems controlling VOC and organic HAP emissions from presses, coating operations, and laminating operations in the printing and publishing and flexible packaging industries. This monitoring approach addresses monitoring of the overall capture and control system. Because this approach addresses the combined capture and control efficiency, additional monitoring of the control device or capture systems associated with individual process units is not required." (Excerpt from EPA's *Technical Support Document (TSD) for Title V Permitting of Printing Facilities*, January 2005)

b. Rationale for Selection of Performance Indicator

Use of the liquid-liquid material balance is an accepted compliance determination method for determining VOC and HAP emissions from solvent recovery systems.

c. Rationale for Selection of Indicator Range

PROPOSED

ATTACHMENT 3

TITLE V FEE SELECTION FORM:

FORM APC 36

PROPOSED

DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
Davy Crockett Tower, 7th Floor,
500 James Robertson Parkway, Nashville, TN 37243
Telephone: (615) 532-0554,
Email: Air.Pollution.Control@TN.gov

APC 36

TITLE V FEE SELECTION

Type or print and submit to the email address above.

FACILITY INFORMATION

1. Organization's legal name and SOS control number [as registered with the TN Secretary of State (SOS)]

2. Site name (if different from legal name)

3. Site address (St./Rd./Hwy.)	County name
City	Zip code

4. Emission source reference number	**5.** Title V permit number

FEE SELECTION

This fee selection is effective beginning January 1, _____. When approved, this selection will be effective until a new Fee Selection form is submitted. Fee Selection forms must be submitted on or before December 31 of the annual accounting period.

6. Payment Schedule (choose one):

Calendar Year Basis (January 1 – December 31) ☐ Fiscal Year Basis (July 1 – June 30) ☐

7. Payment Basis (choose one):

Actual Emissions Basis ☐ Allowable Emissions Basis ☐ Combination of Actual and Allowable Emissions Basis ☐

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.

8. (Continued)

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.

CONTACT INFORMATION (BILLING)

9. Billing contact			Phone number with area code
Mailing address (St./Rd./Hwy.)			Fax number with area code
City	State	Zip code	**Email address**

SIGNATURE BY RESPONSIBLE OFFICIAL

Based upon information and belief formed after reasonable inquiry, I, as the responsible person of the above mentioned facility, certify that the information contained in the submittal is accurate and true to the best of my knowledge. As specified in TCA Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

10. Signature		Date
Signer's name (type or print)	**Title**	Phone number with area code

ATTACHMENT 4

General Provision for 40 CFR Part 60, Subpart Dc

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

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

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

PROPOSED

ATTACHMENT 5

General Provision for 40 CFR Part 63, Subpart KK

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

General Provisions Citation 40 CFR	Subject of Citation	Applies to Subpart	Explanation
§63.1	Applicability	Yes ☒ No ☐	
§63.2	Definitions	Yes ☒ No ☐	
§63.3	Units and Abbreviations	Yes ☒ No ☐	
§63.4	Prohibited Activities and Circumvention	Yes ☐ No ☒	
§63.5	Preconstruction Review and Notification Requirements	Yes ☐ No ☒	
§63.6(a), (b), (c)	Compliance with Standards and Maintenance Requirements—Applicability Compliance Dates	Yes ☐ No ☒	
§63.6(e)	Operation and Maintenance Requirements	Yes ☐ No ☒	
§63.6(f), (g), (i), (j)	Compliance with Non-opacity Emission Standards	Yes ☐ No ☒	
§63.7(a), (e), (f), (g), (h)	Performance Testing Requirements	Yes ☐ No ☒	
§63.8	Monitoring Requirements	Yes ☒ No ☐	
§63.9	Notification Requirements	Yes ☒ No ☐	
§63.10	Recordkeeping and Reporting Requirements	Yes ☒ No ☐	
§63.11	Control Device Requirements	Yes ☐ No ☒	
§63.12	State Authorities and Delegations	Yes ☒ No ☐	
§63.13	Addresses	Yes ☒ No ☐	
§63.14	Incorporations by Reference	Yes ☒ No ☐	
§63.15	Availability of Information and Confidentiality	Yes ☒ No ☐	
§63.16	Performance Track Provisions	Yes ☐ No ☒	

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

PROPOSED

ATTACHMENT 6

GENERAL PROVISIONS FOR 40 CFR PART 63, SUBPART ZZZZ

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

General Provisions Citation 40 CFR	Subject of Citation	Applies to Subpart	Explanation
§63.1	Applicability	Yes ☒ No ☐	
§63.2	Definitions	Yes ☒ No ☐	Additional terms defined in § 63.6675.
§63.3	Units and Abbreviations	Yes ☒ No ☐	
§63.4	Prohibited Activities and Circumvention	Yes ☒ No ☐	
§63.5	Preconstruction Review and Notification Requirements	Yes ☒ No ☐	
§63.6(a), (b), (c)	Compliance with Standards and Maintenance Requirements—Applicability Compliance Dates	Yes ☒ No ☐	
§63.6(e)	Operation and Maintenance Requirements	Yes ☐ No ☒	
§63.6(f), (g), (i), (j)	Compliance with Non-opacity Emission Standards	Yes ☒ No ☐	
§63.7(a), (e), (f), (g), (h)	Performance Testing Requirements	Yes ☒ No ☐	
§63.8	Monitoring Requirements	Yes ☒ No ☐	Subpart ZZZZ contains specific requirements for monitoring at § 63.6625.
§63.9	Notification Requirements	Yes ☒ No ☐	Except that § 63.9(b)(3) is reserved.
§63.10	Recordkeeping and Reporting Requirements	Yes ☒ No ☐	
§63.11	Control Device Requirements	Yes ☐ No ☒	
§63.12	State Authorities and Delegations	Yes ☒ No ☐	
§63.13	Addresses	Yes ☒ No ☐	
§63.14	Incorporations by Reference	Yes ☒ No ☐	
§63.15	Availability of Information and Confidentiality	Yes ☒ No ☐	
§63.16	Performance Track Provisions	Yes ☐ No ☒	

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

PROPOSED

	STATEMENT OF BASIS **Page 1 of 59** **TDEC Division of Air Pollution Control**
Facility Name: Multi-Color Corporation **Permit Number: 579783** **Permit Writer: SDD**	**Facility ID Number: 63-0123** **Date Application Received: January 5, 2022** **Date Application Completed: January 5, 2022** **Date Issued: TBD, 2026**

FACILITY CATEGORY

This facility is a major source of emissions. The facility-wide Potential to Emit (PTE) of one or more regulated air pollutants Volatile Organic Compounds (VOCs) is at or above the Title V major source thresholds.

This facility is a major source of emissions. The facility-wide Potential to emit (PTE of one or more regulated air pollutants Volatile Organic Compounds (VOCs) is at or above the Prevention of Significant Deterioration (PSD and Title V major source thresholds. The facility has accepted federally enforceable limitations/restrictions to remain below (and avoid) the PSD threshold level.

FACILITY DESCRIPTION

Product and Packaging Rotogravure Printing Facility
Multi-Color Corporation (MCC) operates a food and beverage label printing facility, which prints labels using rotogravure printing presses.

PROJECT DESCRIPTION

Title V operating permit 579783 represents the third renewal of the permit since initial 547842 issuance. The permit was updated to remove sources 01, and 03, which have been taken over by SGS. Conditions A-D have been updated as well as E1, E2, and E3-1.

COMPLIANCE STATUS

This facility is located in an attainment area for all criteria pollutants according to the NAAQS.
The date of the last field inspection occurred on December 12, 2024. An NOV was not issued from this inspection.

COLLOCATION DETERMINATION

Collocation is not applicable to this facility.

PERMIT REGISTRY

A permit registry notification is not required for this permit.

PUBLIC NOTICE

Facility Name: Multi-Color Corporation
Permit Number: 579783
Permit Writer: SDD

Facility ID Number: 63-0123
Date Application Received: January 5, 2022
Date Application Completed: January 5, 2022
Date Issued: TBD, 2026

This Title V Permit Renewal will undergo a 30-day public notice period and a 45-day EPA comment period in accordance with TAPCR 1200-03-09-.02(11). The notice was published on the TDEC website on November 9, 2026 The affected states were notified on November 9, 2026.

ADDITIONAL PUBLIC PARTICIPATION

Table 1A: FACILITY EMISSION SOURCES

Source Number	Source Description	Permitted	Exempt/Insignificant	PBR
02	One Steam Generating Boiler (NSPS–Subpart Dc) and three Thermal Heaters	X		
04	Ink Preparation Operation (PSD-LAER) with Wet Scrubber and Carbon Adsorption Control	X		
05	Paper Metalizing		X	
06	Rotogravure Printing Operation (MACT-Subpart KK) with Carbon Adsorption Control	X		
07	Varnish Coating Operation	X		
09	Scrap Paper Coil		X	
10	Scrap Paper Coil		X	
11	Varnish Coater		X	
16	One 60 HP Emergency Generator Engine and One 300 HP Emergency Fire Pump Engine	X		
18	Seamer and Forming Machine		X	
19	10-Rotagravure Printing Operation with Laminator and RTO control (including a cylinder wash tank)	X		
20	Stand Alone Laminator with RTO Control	X		
21	8.00 MMBtu/hr Thermal Oil Heater		X	

Table 1B: CHANGES SINCE LAST PERMIT ISSUANCE

Facility Name: Multi-Color Corporation **Permit Number: 579783** **Permit Writer: SDD**	**Facility ID Number: 63-0123** **Date Application Received: January 5, 2022** **Date Application Completed: January 5, 2022** **Date Issued: TBD, 2026**

Description	Date
Updated Sections A -D to current standard language.	TBD, 2026
Updated sections E1 and E2 to current standard language.	
Updated Condition E3	
Sources 01 and 03 were taken over by SGS	May 26, 2023
Correct typo in E11-2 and E12-2	August 10, 2022
Add conditions E11-2 and E12-2 to clarify control device operation	March 7, 2022
Adding conditions E11-1 and E12-1 for sources 19 and 20	December 28, 2021
Name Change to Multi-Color Corporation	January 29, 2021
Ownership Change to Precision Printing and Packaging, Inc. dba Multi-Color Corporation	December 6, 2017

REGULATORY APPLICABILITY REVIEW	
Regulations	**Comments/ Requirements (Monitoring/Recordkeeping/Reporting/Testing)**
Chapter 6 TAPCR 1200-03-06-.01(7) TAPCR 1200-03-06-.02(2) TAPCR 1200-03-06-.03(2)	Applicable: This facility has fuel burning sources. Compliance is assured by the following: heat input rate, power output capacities, fuel type, emission factors, AP-42, low Nox burner and Flue gas recirculation.
Chapter 7 TAPCR 1200-03-07-.01(5) TAPCR 1200-03-07-.07(2)	Applicable: This facility has process emission sources. Compliance is assured by the following: recordkeeping of the process input material usage rates and recovery rates and, by operating the pollution control equipment recordkeeping of the process input material usage rates , output capacity, documenting fuel usage
Chapter 10	Not Applicable: This facility is not subject to any source testing requirements outlined in this chapter.
Chapter 14 TAPCR 1200-03-14-.01(3) TAPCR 1200-03-14-.03(5)	Applicable: This facility has sources that emit SO2. Compliance is assured by the following: heat input rate, fuel type and emission factors from AP-42.
Other state regulations: ***Chapter(s) 16, 18, 22, 25, 27, etc.***	1200-03-18-.35 Graphic Arts for this rule, a minimum 65% VOC control efficiency is required for the carbon adsorption system. However, pervious construction permit 997248P specified a minimum control efficiency of 74% which supersedes that lower efficiency requirement.

Facility Name: Multi-Color Corporation **Permit Number: 579783** **Permit Writer: SDD**	**Facility ID Number: 63-0123** **Date Application Received: January 5, 2022** **Date Application Completed: January 5, 2022** **Date Issued: TBD, 2026**

REGULATORY APPLICABILITY REVIEW	
Regulations	**Comments/ Requirements (Monitoring/Recordkeeping/Reporting/Testing)**
40 CFR 60	Applicable: The Boiler (ID01) is subject to 40 CFR 60 Subpart Dc: Standards Of Performance For Small Industrial-Commercial-Institutional Steam Generating Units. Construction for the boiler commenced after June 9, 1989, and the boiler's heat input capacity is greater than 10 MMBtu/hr.
40 CFR 61	In general, the facility is subject to the requirements of Subpart M – National Emission Standard for Asbestos only when conducting any renovation or demolition activities at the facility; therefore, if any regulated asbestos-containing materials, including Category I and Category II nonfriable ACM, will be involved, the Clarksville Plant will comply with applicable requirements.
40 CFR 62	Not Applicable: This facility is not subject to any Federal Plans specified in 40 CFR 62.13
40 CFR 63	40 CFR 63 Subpart KK National Emission Standards for Hazardous Air Pollutants (NESHAP) for the printing and publishing industry, covering rotogravure and wide-web flexographic printing operations , 40 CFR 63 Subpart ZZZZ National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
40 CFR 68	Not Applicable: The facility does not use or store the subject chemicals above threshold quantities.
40 CFR 64	Applicable: CAM is applicable to Pollutant Specific Emissions Unit (PSEU). The PSEU… (1) is subject to an emission limitation or standard, and (2) uses a control device to achieve compliance, and (3) has potential pre-control emissions that exceed or are equivalent to the major source threshold. Emission Sources: 63-0123-04 Ink Preparation Operation 63-0123-06 Rotogravure Printing Operation
Special Conditions, Monitoring, Limits	Not Applicable: This facility does not have any special conditions, monitoring, or testing requirements.
Modeling Review	Not Applicable: This facility does not emit Pb, HCl, or HF.
Previous Permit Number(s)	571355, 547842, 997248P

EMISSION SUMMARY

Facility Name: Multi-Color Corporation **Permit Number: 579783** **Permit Writer: SDD**	**Facility ID Number: 63-0123** **Date Application Received: January 5, 2022** **Date Application Completed: January 5, 2022** **Date Issued: TBD, 2026**

Table 2: FACILITY WIDE EMISSION LIMIT

Not Applicable

Notes:

Table 3: FACILITY WIDE EMISSIONS

FACILITY WIDE EMISSIONS			
Pollutant	**Actual/Controlled Emissions**	**Uncontrolled Emissions**	**Potential to Emit (PTE)**
	TPY	**TPY**	**TPY**
$PM/PM_{10}/PM_{2.5}$	<15.81	<15.81	15.81
SO_2	<120.15	<120.15	120.15
NO_x	<16.05	<16.05	16.05
CO	<24.52	<24.52	24.52
VOC	<386.62	~4035.13	386.62
Total Single HAP	<9.9	<9.9	9.9
Total Combined HAPs	<24.9	<24.9	24.9

Notes:

Table 4: SOURCE SPECIFIC EMISSIONS

PERMIT EMISSIONS				
SOURCE 02				
Pollutant	**Actual/Controlled Emissions**	**Uncontrolled Emissions[1]**	**Potential to Emit (PTE)**	**Permitted Allowable**
	TPY	**TPY**	**TPY**	**TPY**
$PM/PM_{10}/PM_{2.5}$	<9.2	<9.2	<9.2	9.2
SO_2	<116.95	<116.95	<116.95	116.95
NO_x	<13.23	<13.23	<13.23	13.23
CO	<14.02	<14.02	<14.02	14.02
VOC	<0.88	<0.88	<0.88	0.88

Facility Name: Multi-Color Corporation
Permit Number: 579783
Permit Writer: SDD

Facility ID Number: 63-0123
Date Application Received: January 5, 2022
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PERMIT EMISSIONS				
SOURCE 04				
Pollutant	**Actual/Controlled Emissions**	**Uncontrolled Emissions[2]**	**Potential to Emit (PTE)**	**Permitted Allowable**
	TPY	**TPY**	**TPY**	**TPY**
VOC	<35.04	<350.4	<35.04	35.04

PERMIT EMISSIONS				
SOURCE 06				
Pollutant	**Actual/Controlled Emissions**	**Uncontrolled Emissions[2]**	**Potential to Emit (PTE)**	**Permitted Allowable**
	TPY	**TPY**	**TPY**	**TPY**
VOC	<296.8	<2,968.0	<296.8	296.8

PERMIT EMISSIONS				
SOURCE 07				
Pollutant	**Actual/Controlled Emissions**	**Uncontrolled Emissions[1]**	**Potential to Emit (PTE)**	**Permitted Allowable**
	TPY	**TPY**	**TPY**	**TPY**
VOC	<14.0	<14.0	<14.0	14.0

PERMIT EMISSIONS				
SOURCE 16				
Pollutant	**Actual/Controlled Emissions**	**Uncontrolled Emissions[1]**	**Potential to Emit (PTE)**	**Permitted Allowable**
	TPY	**TPY**	**TPY**	**TPY**
$PM/PM_{10}/PM_{2.5}$	<6.61	<6.61	<6.61	6.61
SO_2	<3.2	<3.2	<3.2	3.2
NO_x	<2.82	<2.82	<2.82	2.82
CO	<10.5	<10.5	<10.5	10.5
VOC	<0.88	<0.88	<0.88	0.88

Facility Name: Multi-Color Corporation
Permit Number: 579783
Permit Writer: SDD

Facility ID Number: 63-0123
Date Application Received: January 5, 2022
Date Application Completed: January 5, 2022
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PERMIT EMISSIONS				
SOURCE 19				
Pollutant	**Actual/Controlled Emissions**	**Uncontrolled Emissions[3]**	**Potential to Emit (PTE)**	**Permitted Allowable**
	TPY	**TPY**	**TPY**	**TPY**
VOC	<25.44	481.59	<25.44	25.44

PERMIT EMISSIONS				
SOURCE 20				
Pollutant	**Actual/Controlled Emissions**	**Uncontrolled Emissions[3]**	**Potential to Emit (PTE)**	**Permitted Allowable**
	TPY	**TPY**	**TPY**	**TPY**
VOC	<13.58	219.38	<13.58	13.58

Notes:
*1. Uncontrolled emissions are equal to controlled emissions as there are no control devices.
*2. The reported control efficiency is 90% so uncontrolled emissions are calculated at100%
*3. Uncontrolled emissions from application data.

SUMMARY AND CONCLUSIONS
It has been determined that this facility, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.