

PROPOSED

**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:

580324

Issued To:

Plus Mark, LLC.

Installation Address:

101 American Road
Afton

Installation Description:

Giftwrap Printing and Converting Operation:

01: One Natural Gas Fired Boiler with #2 Fuel Oil as Back-up

05: Seven Rotogravure Printing Presses with Natural Gas Fired Dryer

10: Diesel Fuel Fired Fire Water Pump

11: Flexographic Printing Press and Dryers

Facility ID: 30-0132

Renewal Application Due Date:

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

Primary SIC: 2754

Information Relied Upon:

Renewal Application dated April 21, 2022 and construction permit application dated January 9, 2024

(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

7/11/19

RDA-1298

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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)

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

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.

(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)

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)

SECTION B

GENERAL CONDITIONS for MONITORING, REPORTING, and ENFORCEMENT

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

(a) Where applicable, records of required monitoring information include the following:

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

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

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

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

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

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

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

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

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

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

(a) The identification of each term or condition of the permit that is the basis of the certification;

(b) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period; such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;

(c) The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in B5(b) above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion* or exceedance** as defined below occurred; and

(d) Such other facts as the Technical Secretary may require to determine the compliance status of the source.

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

** "Exceedance" shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or

less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

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

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

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

B7. Reserved

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.

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

SECTION C

PERMIT CHANGES

- C1. Operational flexibility changes.** The source may make operational flexibility changes that are not addressed or prohibited by the permit without a permit revision subject to the following requirements:
- (a) The change cannot be subject to a requirement of Title IV of the Federal Act or 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.
 - (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)

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.

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)

SECTION E

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

30-0132	Facility Description:	Plus Mark, Inc. is a printing facility that uses Seven rotogravure printing presses with natural gas fired dryer and one flexographic printing press with dryer to produce gift wrapping paper. Water based ink for the printing presses is mixed on site. One natural gas fired boiler is located on site.
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Conditions E1 through E3 apply to all sources in Section E of this permit unless otherwise noted.

E1. Fee payment**FEE EMISSIONS SUMMARY TABLE FOR MAJOR SOURCE 30-0132**

REGULATED POLLUTANTS	ALLOWABLE EMISSIONS (tons per AAP)	ACTUAL EMISSIONS (tons per AAP)	COMMENTS
PARTICULATE MATTER (PM)	2.63	AEAR	Includes all fee emissions.
SO ₂	47.76	AEAR	Includes all fee emissions.
VOC	249.0	AEAR	Includes all fee emissions.
NO _x	37.13	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 January 1, 2023 and ends December 31, 2023.** The next AAP begins **January 1, 2024** and ends **December 31, 2024** unless a request to change the annual accounting period is submitted by the responsible official as required by subparagraph 1200-03-26-.02(9)(b) of the TAPCR and approved by the Technical Secretary. If the permittee wishes to revise their annual accounting period or their annual emission fee basis as allowed by subparagraph 1200-03-26-.02(9)(b) of the TAPCR, the responsible official must submit the request to the Division in writing on or before December 31 of the annual accounting period for which the fee is due. If a change in fee basis from allowable emissions to actual emissions for any pollutant is requested, the request from the responsible official must include the methods that will be used to determine actual emissions. **Changes in fee bases must be made using the Title V Fee Selection form, form number APC 36 (CN-1583), included as an attachment to this permit and available on the Division of Air Pollution Control's website.**

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

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

- (1) **each regulated pollutant** (Particulate matter, [PM] SO₂, VOC, NO_x and so forth. See TAPCR 1200-03-26-.02(2)(i) for the definition of a regulated pollutant.),
- (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**,
- (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)(a) 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:
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

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, 2024** to **September 30, 2024** and **October 1, 2024** to **March 31, 2025** 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
571746	October 1, 2024	day before new permit issuance (with year)
580324	Issuance Date of new permit (with year)	March 31, 2025

These semiannual reports shall include:

- (1) Any monitoring and recordkeeping required by **Conditions E4, E4-3, E4-5, E5-2, E5-9, and E7-10** of this permit. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
- (2) The visible emission evaluation readings from **Condition E-3-1** of this permit if required. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
- (3) Identification of all instances of deviations from **ALL PERMIT REQUIREMENTS**.

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

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

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

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

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

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

Annual compliance certifications shall cover the 12-month period from **October 1, 2024** to **September 30, 2025** 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
571746	October 1, 2024	day before new permit issuance (with year)
580324	Issuance Date of new permit (with year)	September 30, 2025

These certifications shall be submitted to:

TN APCD and EPA

Division of Air Pollution Control
Johnson City Environmental Field Office
2305 Silverdale Road
Johnson City, TN 37601-2162
or
APC.JCEFO@tn.gov

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

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

E3-1. Visible and Fugitive Emissions

- A. Unless otherwise specified, visible emissions from this facility shall not exhibit greater than 20% opacity, except for one six-minute period in any one-hour period, and for no more than four six-minute periods in any 24-hour period. A stack is defined as any chimney, flue, conduit, exhaust, vent, or opening of any kind whatsoever, capable of, or used for, the emission of air contaminants.

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

Compliance Method: When required to demonstrate compliance, visible emissions shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

- B. 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. Reasonable precautions shall include, but are not limited to, the following:
- (a) Use, where possible, of water or chemicals for control of dust in demolition of existing buildings or structures, construction operations, grading of roads, or the clearing of land;
 - (b) Application of asphalt, water, or suitable chemicals on dirt roads, material stockpiles, and other surfaces which can create airborne dusts;
 - (c) Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting or other similar operations.

The permittee shall not cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five 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 1200-03-20. A malfunction is defined as, any sudden and unavoidable failure of process equipment or for a process to operate in an abnormal and unusual manner. Failures that are caused by poor maintenance, careless operation, or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.

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

Compliance Method: When required to demonstrate compliance, fugitive emissions shall be determined by Tennessee Visible Emissions Evaluation Method 4 as adopted by the Tennessee Air Pollution Control Board on April 16, 1986.

- C. Fugitive emissions from roads and parking areas shall not exhibit greater than 10% opacity.

TAPCR 1200-03-08-.03

Compliance Method: When required to demonstrate compliance, fugitive emissions from roads and parking areas shall be determined by utilizing Tennessee Visible Emissions Evaluation (TVEE) Method 1, as adopted by the Tennessee Air Pollution Control Board on April 29, 1982, as amended on September 15, 1982, and August 24, 1984.

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.

E3-2. General Recordkeeping Requirements

- A. All recordkeeping requirements for all data required to be recorded shall follow the following schedules:

For Daily Recordkeeping	For Weekly Recordkeeping	For Monthly Recordkeeping
No later than seven days from the end of the day for which the data is required.	No later than seven days from the end of the week for which the data is required.	No later than 30 days from the end of the month for which the data is required.

- B. The information contained in logs, records, and submittals required by this permit shall be kept at the facility's address, unless otherwise noted, and provided to the Technical Secretary or a Division representative upon request. Computer-generated logs are acceptable. Compliance is assured by retaining the logs, records, and submittals specified in this permit for a period of not less than five years at the facility's address.

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

E3-3. Identification of Responsible Official, Technical Contact, and Billing Contact

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

- E4.** This facility is classified as an Area Source in accordance with the provisions of Subpart KK – National Emission Standards for the Printing and Publishing Industry, 40 CFR 63.820(a)(2)(i) and (ii). These provisions allow a facility to establish itself as an Area Source as long as usage of each individual Hazardous Air Pollutant is below 10 tons for each consecutive 12 month period and usage of any combination of HAPs is less than 25 tons for each consecutive 12 month period, including materials used at this facility for source categories or purposes other than printing and publishing. The operator of this facility shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis. The company has certified that the maximum emissions of HAPs from insignificant sources will not exceed 200 pounds of any individual HAP over any consecutive 12-month period and 900 pounds of any combination of HAPs over any consecutive 12-month period. These quantities will be added to the quantities of HAPs from the permitted sources at the facility.

FACILITY WIDE HAP EMISSIONS LOG

MONTH:

SOURCE NAME	HAP 1 (tons)	HAP 2 (tons)	TOTAL HAPs (tons)
Printing presses and dryer			
Insignificant sources	.008	.008	.0375
Totals			

12 MONTH CONSECUTIVE FACILITY WIDE HAP EMISSION LOG

MONTH/ YEAR	HAP 1 (tons)	HAP 1 (tons/12 month)	HAP 2 (tons)	HAP 2 (tons/12 month)	TOTAL HAP (tons)	TOTAL HAPS (tons/12 month)

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

- E4-1.** The maximum emission rate from the entire facility for any single hazardous air pollutant (HAP), listed pursuant to Section 112(b) of the Federal Act, shall not exceed 9.9 tons per all interval of twelve consecutive months. Total emissions of all HAPs from the entire facility shall not exceed 24.9 tons per all intervals of twelve consecutive months. In the event that the emission rates from the entire facility exceed these limits, the permittee shall provide written notification of the exceedance(s) to the Technical Secretary within fifteen days from the date of discovery.

This emission limitation is established pursuant to Rule 1200-03-09-.02(11)(a) of the Tennessee Air Pollution Control Regulations and the information contained in the agreement letter dated August 8, 2017, from the permittee.

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

Compliance Method: Compliance with this emission limit shall be demonstrated by maintaining records of all HAP emissions as required by **Condition E4** of this permit.

E4-2. Insignificant activities

Insignificant activities as stated by the permittee in the Title V Application dated April 21, 2022 and updated forms received August 8 and 9, 2023, per Rule 1200-03-09-.04(5))are listed below. Additional insignificant activities may be added and operated at any time with the provision that a written notification shall be submitted to the Technical Secretary including an updated APC V.2 application form along with a truth, accuracy, and completeness statement signed by a responsible official. The permit may be updated to include additional insignificant sources by means of an administrative amendment, if necessary.

Activity	ESRN	Exempt Under Rule
Five Small Natural Gas Fired Air Handling Units	N/A	Rule 1200-03-09-.04(5)(f)14.
Two 13" Wide Flexographic Printing Presses	N/A	Rule 1200-03-09-.04(5)(a)4(i).
Two 6000 Gallon Diesel Storage Tanks	N/A	Rule 1200-03-09-.04(5)(f)17
Maintenance Shop Welding	N/A	Rule 1200-03-09-.04(5)(f)45.
Four natural Gas Fired Infra-Red Tube Heaters	N/A	Rule 1200-03-09-.04(5)(f)14.

- E4-3.** Volatile organic compounds (VOC) emitted from this entire facility, including emissions from exempt and insignificant emission units, shall not exceed 249.0 tons per all intervals of twelve consecutive months.

TAPCR 1200-03-07-.07(2), TAPCR 1200-03-18-.02(2)

Compliance Method: Compliance with this emission limitation shall be certified through recordkeeping of VOC emissions using a log in the format in Attachment 4, or in an alternative format which readily provides the same information. Emissions from combustion sources shall be calculated using the emission factors from the most current AP-42 tables 1.4-1 and 1.4-2. Actual emissions from exempt or insignificant activities may be calculated each month, or the permittee may choose to use potential emission rates for these units.

TAPCR 1200-03-10-.02(2)(a), 1200-03-07-.01(5) and the agreement letter dated August 8, 2017 (Attachment 5)

- E4-4. VOC/HAP content and emissions calculation log.** The as-supplied VOC and HAP content of all VOC and HAP-containing materials (all coatings, inks, adhesives, thinners, and solvents) to be used by this facility shall be determined from Safety Data Sheets (SDS) or manufacturer or vendor formulation data which explicitly list the VOC and HAP content by weight. If new materials are used, or if material formulation is changed, logs used to calculate emissions of VOC and HAP shall be updated within 30 days from the initial date of usage of the new or altered material.

TAPCR 1200-03-09-.03(8) and TAPCR 1200-03-10-.02(2)(a)

Compliance Method: Purchase orders and/or invoices for all VOC- and HAP-containing materials, along with current SDS, must be maintained and kept available for inspection by the Technical Secretary or a Division representative. The SDS must explicitly list the VOC and HAP content by weight for all VOC- and HAP-containing materials. If SDS are not available with this information, vendor formulation data containing the required information for those materials must also be maintained. These records must be retained in accordance with **Condition E2(c)**. Scanned documents (maintained electronically) may be used to fulfill this requirement.

TAPCR 1200-03-10-.02(2)(a), TAPCR 1200-03-09-.02(11)(e)1.(iii)

E4-5. Facility Wide usage limit

The maximum material input rate for the printing sources at this facility shall not exceed 1,710,000 pounds per month of ink and solvent combined. This emission limitation is established pursuant to Rule 1200-03-07-.01(5) of the Tennessee Air Pollution Control Regulations and the information contained in the agreement letter dated August 8, 2017, from the permittee. Should the permittee need to modify the source(s) in a manner that increases the maximum material input rate a construction permit or Title V modification shall first be applied for and received in accordance with TAPCR 1200-03-09-.01, and TAPCR 1200-03-09-

Conditions E5-1 through E5-9 apply to source 30-0132-01.

.02(11)(d)1(i)(V) prior to making the change.

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

Compliance Method: The permittee shall maintain documentation to demonstrate the material input rate for the printing sources at this facility. Documentation shall include, but is not limited to, manufacturer's specifications, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

30-0132-01 Source Description: Fuel Burning Installation with Boiler: One 20.412 Million Btu /hr Natural Gas Fired Boiler with #2 Fuel Oil as Back-up - 40 CFR 60 Subpart Dc

- E5-1.** The stated design heat capacity of the boiler is 20.412 MMBTU/hr. Should the permittee need to modify the boiler in a manner that increases the stated design capacity rate, a construction permit or Title V modification shall first be applied for and received in accordance with TAPCR 1200-03-09-.01, and 1200-03-09-.02(11)(d)1(i)(V) prior to making the change.

TAPCR 1200-03-09-.03(8) and the application with date January 9, 2024

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

- E5-2.** Only natural gas or number 2 fuel oil shall be used as fuel(s) for the boiler. Should the permittee need to modify the boiler to allow the use of a fuel other than natural gas or number 2 fuel oil, a construction permit or Title V modification shall first be applied for and received in accordance with TAPCR 1200-03-09-.01 and 1200-03-09-.02(11)(d)1(i)(V) prior to making the change.

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

Compliance Method: The permittee shall maintain a log of the fuel used on a monthly basis. This log must be maintained at the source location and kept available for inspection by the Technical Secretary or a Division representative. The monthly log shall be kept in the format as in Attachment 4, or a format which readily provides the same required information. Alternatively, the permittee shall record and maintain record of the amount of fuel delivered to the property during each calendar month. This log must be retained for a period of not less than five years. Maintenance of this log fulfills the requirements of 40 CFR §60.48c(g) and 40 CFR §60.48c(i).

TAPCR 1200-03-10-.02(1)(a)

- E5-3.** Sulfur Dioxide (SO₂) emitted from this source shall not exceed 10.4 pounds per hour on a daily average basis.

TAPCR 1200-03-14-.03(5) and the application with date January 9, 2024

Compliance Method: Compliance with this emission limitation is assured by compliance with **Conditions E5-1, E5-2** and the AP-42 emission factors from Natural Gas Combustion – Tables 1.4-1 and 1.4-2, Supplement to 5th Edition, dated July 1998.

- E5-4.** Particulate matter (PM) emitted from this source shall not exceed 0.5 pounds per hour on a daily average basis.

TAPCR 1200-03-06-.02(2)(a) and the application with date January 9, 2024

Compliance Method: Compliance with this emission limitation is assured by compliance with **Conditions E5-1, E5-2** and the AP-42 emission factors from Natural Gas Combustion – Tables 1.4-1 and 1.4-2, Supplement to 5th Edition, dated July 1998.

- E5-5.** Nitrogen oxides (NO_x) emitted from this source shall not exceed 13.14 tons during any period of 12-consecutive months.

TAPCR 1200-03-06-.03(2) and the application with date January 9, 2024

Compliance Method: Compliance with this emission limitation is assured by compliance with **Conditions E5-1 and E5-2**, and the AP-42 emission factors from Natural Gas Combustion – Tables 1.4-1 and 1.4-2, Supplement to 5th Edition, dated July 1998.

- E5-6.** Carbon Monoxide (CO) emitted from this source shall not exceed 7.45 tons during any period of 12-consecutive months.

TAPCR 1200-03-06-.03(2) and the application with date January 9, 2024

Compliance Method: Compliance with this emission limitation is assured by compliance with **Conditions E5-1 and E5-2**, and the AP-42 emission factors from Natural Gas Combustion – Tables 1.4-1 and 1.4-2, Supplement to 5th Edition, dated July 1998.

- E5-7.** This facility is considered an area source for HAP emissions. The boiler is not currently subject to 40 CFR 63 Subpart JJJJJ since the gas-fired boiler meets the definition below pursuant to 40 CFR §63.11237.

“Gas-fired boiler” includes any boiler that burns gaseous fuels not combined with any solid fuels, burns liquid fuel only during periods of gas curtailment, gas supply emergencies, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.

Compliance Method: The permittee shall assure compliance with the “gas-fired boiler” definition by denoting in the log, required by **Condition E5-2**, the operating hours using liquid fuel and the reason for the liquid fuel usage (i.e. gas curtailment, periodic testing, etc.).

40 CFR §63.11237

- E5-8.** The permittee shall prepare and submit reports consistent with the provisions of 40 CFR §60.48c(d) and (e). Reports shall cover each six-month period (January 1 – June 30 and July 1 – December 31) and must be postmarked or emailed by the 30th day following the end of each reporting period. Subsequent reports shall cover each six-month reporting period following the first report and must be postmarked by the 30th day following the end of each reporting period.

Each report shall include the following information:

- (a) Calendar dates covered in the reporting period.
- (b) Records of fuel supplier certification used to demonstrate compliance with Section (c) of this condition that includes:
 - (i) The name of the oil supplier.
 - (ii) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR §61.41c, and
 - (iii) The sulfur content of the oil.
- (c) A certified statement signed by the permittee that the records of fuel supplier certification submitted represent all of the fuel combusted during the reporting period.

40 CFR 60.48c(d), (e), and (f)(1)

Compliance Method: Compliance with this condition is assured by preparing the required reports and submitting them within the timeframe specified above. All reports shall be submitted to the U.S. EPA and the Technical Secretary within the specified timeframes. Reports submitted to the Technical Secretary shall be addressed to the Permitting Program and submitted to the

address listed in **Condition E2**. Reports submitted to the U.S. EPA shall be addressed to EPA Region IV and submitted to the address provided in 40 CFR §60.4(a).

- E5-9.** Certifications from the fuel oil supplier of the sulfur content (by weight) for each shipment of fuel oil must be maintained at the source location. Alternatively, the vendor may supply a statement effecting that all No. 2 fuel oil will contain no more than 0.5% sulfur by weight. This information must be retained for a period of not less than five years and kept available for inspection by the Technical Secretary or a Division representative.

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

30-0132-05 Source Description:	Printing of giftwrap paper; Seven Rotogravure Printing Presses (units P1, P2, P3, P4, P5, P6, P8) with one Natural Gas Fired Dryer. Ink Mixing Operation on site.
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Conditions E6-1 through E6-7 apply to source 30-0132-05.
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- E6-1.** The maximum heat input for the dryer shall not exceed 9.0 MMBtu/hr. Should the permittee need to modify the source in a manner that increases the maximum heat input rate a construction permit or Title V modification shall first be applied for and received in accordance with TAPCR 1200-03-09-.01 and TAPCR 1200-03-09-.02(11)(d)1(i)(V) prior to making the change.

TAPCR 1200-03-09-.03(8), 1200-03-09-.02(11)(d)1(i)(V)

Compliance Method: The permittee shall maintain documentation to substantiate the rated heat input capacity of the dryer. Documentation may include, but is not limited to, purchase records, manufacturer's specifications, operating manuals, or a tag affixed to the unit by the manufacturer. This information shall be kept readily accessible and made available upon request by the Technical Secretary or a Division representative. If the permittee wishes to increase or modify the design heat input capacity of this incinerator, a construction permit or Title V modification shall first be applied for and received in accordance with TAPCR 1200-03-09-.01(1) and TAPCR 1200-03-09-.02(11)(d)1(i)(V) prior to making the change.

- E6-2.** This source is subject to the standards applicable to packaging rotogravure presses under TAPCR 1200-03-18-.35, Graphic Arts Systems.

TAPCR 1200-03-18-.35(3) or (4)

Compliance Method: The operator of this source has elected to show compliance with this standard through the use of compliant coatings and inks with a VOC content equal to or less than 0.5 pound VOC per pound coating (excluding clean-up solvents) or ink solids, as applied. The VOC content of the coatings and inks will be recorded in the logs required by **Condition E4-3**. Alternatively the permittee may comply by calculating the weighted average as specified in TAPCR 1200-03-18-.35(4).

- E6-3.** Only natural gas shall be used as fuel(s) for the dryer. Should the permittee need to modify the dryer to allow the use of a fuel other than natural gas, a construction permit or Title V modification shall first be applied for and received in accordance with TAPCR 1200-03-0-.01 and TAPCR 1200-03-09-.02(11)(d)1(i)(V) prior to making the change.

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

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

- E6-4.** Sulfur dioxide emitted from the dryer shall not exceed 0.02 ton during all intervals of twelve consecutive months.

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

Compliance Method: Compliance with this emission limitation shall be assured by compliance with **Conditions E6-1, E6-3** and the use of AP-42 emission factors from Natural Gas Combustion – Tables 1.4-1 and 1.4-2, Supplement to 5th Ed, 7/98.

- E6-5.** Particulate matter (TSP) emitted from the dryer shall not exceed 0.07 pound per hour.

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

Compliance Method: Compliance with this emission limitation shall be assured by compliance with **Conditions E6-1, E6-3** and the use of AP-42 emission factors from Natural Gas Combustion – Tables 1.4-1 and 1.4-2, Supplement to 5th Ed, 7/98.

- E6-6.** Nitrogen oxides (NO_x) emitted from the dryer shall not exceed 6.1 tons during all intervals of twelve consecutive months.

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

Compliance Method: Compliance with this emission limitation shall be assured by compliance with **Conditions E6-1, E6-3** and the use of AP-42 emission factors from Natural Gas Combustion – Tables 1.4-1 and 1.4-2, Supplement to 5th Ed, 7/98.

- E6-7.** Carbon Monoxide (CO) emitted from the dryer shall not exceed 3.3 tons during all intervals of twelve consecutive months.

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

Compliance Method: Compliance with this emission limitation shall be assured by compliance with **Conditions E6-1, E6-3** and the use of AP-42 emission factors from Natural Gas Combustion – Tables 1.4-1 and 1.4-2, Supplement to 5th Ed, 7/98.

30-0132-10	Source Description:	One Diesel-Fuel Fired Powered Fire Water Pump: Equipped with an Engine Rated at 227 HP - 40 CFR Part 63 Subpart ZZZZ and 40 CFR Part 60 Subpart IIII
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Conditions E7-1 through E7-16 apply to source 30-0132-10
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- E7-1** The design rated power for the compression ignition engine serving the fire pump is 227 HP. This engine is subject to the requirements of 40 CFR Part 60 Subpart IIII. This fire pump engine was manufactured after July 1, 2006 and installed in February 2009. This fire pump engine is subject to the requirements of 40 CFR Part 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition (CI) Internal Combustion Engines (ICE) 40 CFR §60.4200. Should the permittee need to modify the source(s) in a manner that increases the design rated power a construction permit or Title V modification shall first be applied for and received in accordance with TAPCR 1200-03-09-.01 and TAPCR 1200-03-09-.02(11)(d)1(i)(V) prior to making the change.

TAPCR 1200-03-09-.01

Compliance Method: The permittee shall maintain documentation to demonstrate the design rated power for the compression ignition engine. Documentation shall include, but is not limited to, manufacturer's specifications, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

- E7-2.** This source is subject to the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ). Pursuant to 40 CFR §63.6590(c)(1), this affected source (which is a new stationary RICE located at an area source of HAP emissions) shall meet the requirements of 40 CFR Part 63 by meeting the requirements of 40 CFR Part 60, Subpart IIII. No further requirements apply for this engine under 40 CFR Part 63.
- E7-3.** Only diesel fuel shall be used as fuel for this source. Should the permittee need to modify the source to allow the use of a fuel other than diesel fuel, a construction permit or Title V modification shall first be applied for and received in accordance with TAPCR 1200-03-09-.01 and 1200-03-09-.02(11)(d)1(i)(V) prior to making the change.

TAPCR 1200-03-09-.03(8) and the application dated October 14, 2015, from the permittee

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

- E7-4.** The permittee has designated this source as an Emergency Fire Pump Engine. According to a memorandum dated September 6, 1995, from John Seitz, Director, Office of Air Quality Planning and Standards, "EPA believes that 500 hours is an appropriate default assumption for estimating the number of hours that an emergency generator could be expected to operate under worst-case conditions." This value will be assumed to be the maximum operating hours per calendar year for this source for the

purpose of establishing a “potential to emit” for the facility for the pollutants of concern for the engine specified in **Conditions E7-5, E7-6, E7-7, and E7-8**. The 500-hour value includes the 100 hours per calendar year for maintenance checks and readiness testing as specified in **Condition E7-10**. In the event the unit operates more than 500 hours during a period of one calendar year, the total annual hours of operation shall be reported to the Technical Secretary within 30 days of the end of the calendar year, along with the amount of fuel used, and actual emissions from this unit.

40 CFR §60.4211(f) and the application dated October 14, 2015, from the permittee

- E7-5.** Particulate matter (PM) emitted from this source shall not exceed 0.4 gram per horsepower-hour (0.20 pound per hour).

40 CFR §60.4205(c) and TAPCR 1200-03-09-.03(8)

Compliance Method: Compliance with this emission limitation is based on compliance with **Conditions E7-1 and E7-3** of this permit and the manufacturer’s certification of compliance with 40 CFR §60.4205(c).

- E7-6.** Sulfur dioxide (SO₂) emitted from this source shall not exceed 0.5 pound per hour.

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

Compliance Method: Compliance with this emission limitation is based on compliance with **Conditions E7-1 and E7-3** of this permit and AP-42, Table 3.3-1, Emission Factors for Gasoline and Diesel Industrial Engines.

- E7-7.** Carbon monoxide (CO) emitted from this source (30-0132-10) shall not exceed 2.6 grams per horsepower-hour (1.30 lb/hr).

40 CFR §60.4205(c) and TAPCR 1200-03-09-.03(8)

Compliance Method: Compliance with this emission limitation is based on compliance with **Conditions E7-1 and E7-3** of this permit and the manufacturer’s certification of compliance with 40 CFR §60.4205(c).

- E7-8.** Non-methane hydrocarbon plus nitrogen oxides (NMHC + NO_x) emitted from this source shall not exceed 7.8 grams per horsepower-hour (3.90 pounds per hour). 40 CFR §60.4205(c) and TAPCR 1200-03-09-.03(8)

Compliance Method: Compliance with this emission limitation is based on compliance with **Conditions E7-1 and E7-3** of this permit and the manufacturer’s certification of compliance with 40 CFR §60.4205(c).

- E7-9.** Pursuant to 40 CFR §60.4207(b), the permittee shall use diesel fuel that meets the requirements of 40 CFR §1090.305, as follows:

- (1) Sulfur content shall not exceed 15 parts per million (ppm) maximum for nonroad diesel fuel.
- (2) Cetane index or aromatic content, as follows:
 - (i) A minimum cetane index of 40; or
 - (ii) A maximum aromatic content of 35 volume percent.

Compliance Method: The permittee shall assure compliance through the vendor’s certification of sulfur content and by keeping records. The permittee shall use vendor’s certification for the sulfur content for each shipment of diesel fuel, or alternatively, the vendor may supply a statement that all diesel fuel delivered to the facility will contain no more than 15 ppm sulfur (0.0015 wt. %) and no less than the cetane index of 40.0 or no more than the aromatic content of 35 volume percent.

- E7-10.** The permittee must keep monthly records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for the following categories: (a) emergency operation, as specified in **Condition E7-15**, Paragraph (1), including what classified the operation as emergency; (b) maintenance checks and readiness testing, demand response, as specified in **Condition E7-15**, Paragraph (2); and (c) non-emergency operation, as specified in **Condition E7-15**, Paragraph (3). The permittee shall calculate the operating hours during each calendar year. The permittee shall maintain the following log format or an alternative format which readily provides the same required information.

Logs for Emergency Stationary RICE, 30-0132-10

Year:				
Month	Operating Hours		Emergency Operation	Comments*
	Maintenance Checks and Readiness Testing	Other Non-Emergency Operation		
January				
February				
March				
April				
May				
June				
July				
August				
September				
October				
November				
December				
Subtotal				
Total				

*The permittee must document the number of hours spent for emergency operation including what classified the operation as emergency and the number of hours spent for non-emergency operation.

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

- E7-11.** Pursuant to 40 CFR §60.4206, the permittee must operate and maintain stationary CI ICE that achieve the emission standards as required in 40 CFR §60.4205 over the entire life of the engine.
- E7-12.** Pursuant to 40 CFR §60.4209(a), for each emergency stationary CI internal combustion engine that does not meet the standards applicable to non-emergency engines, the permittee must install a non-resettable hour meter prior to startup of the engine.
- E7-13.** Pursuant to 40 CFR §60.4211(a), the permittee must do all of the following, except as permitted under paragraph(4)of this condition:
- (1) Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions;
 - (2) Change only those emission-related settings that are permitted by the manufacturer; and
 - (3) Meet the requirements of 40 CFR part 89, 94 and/or 1068, as they apply to the permittee.
 - (4) If the permittee does not install, configure, operate, and maintain the engine and control device according to the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee must demonstrate compliance as follows:
 - (i) For each stationary CI internal combustion engine greater than or equal to 100 HP and less than or equal to 500 HP, the permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, the permittee must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after the permittee changes emission-related settings in a way that is not permitted by the manufacturer.
- E7-14.** The permittee shall comply with the PM and (NMHC + NO_x) emission limitations by purchasing an engine certified to the emission standards in 40 CFR §60.4205(c) based on the model year and maximum engine power. The permittee shall maintain a record of this certification. The engine shall be installed and configured according to the manufacturer's emission-related specifications, except as permitted in paragraph (4) of **Condition E7-13** of this permit. 40 CFR §60.4211(c)

E7-15. Pursuant to 40 CFR §60.4211(f), the permittee must operate the emergency stationary ICE according to the requirements in paragraphs (1) through (3) of this condition. In order for the engine to be considered an emergency stationary ICE under 40 CFR 60, subpart IIII, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (1) through (3) of this condition, is prohibited. If the permittee does not operate the engine according to the requirements in paragraphs (1) through (3) of this condition, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

- (1) There is no time limit on the use of emergency stationary ICE in emergency situations.
- (2) The permittee may operate your emergency stationary ICE for any combination of the purposes specified in paragraphs (2)(i) through (iii) of this condition for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (3) of this condition counts as part of the 100 hours per calendar year allowed by this paragraph (2).
 - (i) Emergency stationary ICE 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 owner or operator may petition the Technical Secretary for approval of additional hours to be used for maintenance check and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.
 - (ii) Emergency stationary ICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §60.17), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.
 - (iii) Emergency stationary ICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.
- (3) Emergency stationary ICE 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 and emergency demand response provided in paragraph (2) of this condition. Except as provided in paragraph (3)(i) of this condition, the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a 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 non-emergency 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 owner or operator 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.

E7-16. Pursuant to 40 CFR §60.4214(b), for each emergency stationary internal combustion engine, the permittee is not required to submit an initial notification.

30-0132-11 Source Description:	Flexographic printing operation: one press using water based inks and three natural gas fired dryers 40 CFR Part 63 Subpart KK
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Conditions E8-1 through E8-3 apply to source 30-0132 -11
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E8-1. Input Limitation(s) or Statement(s) of Design

- A. The stated design heat input capacity of the dryers is 1.88 MMBtu/hr. Should the permittee need to modify the dryers in a manner that increases the stated design heat input rate, 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) and the application with date October 21, 2021

Compliance Method: The permittee shall maintain documentation to substantiate the rated heat input capacity of the dryers. Documentation may include, but is not limited to, purchase records, manufacturer's specifications, operating manuals, or a tag affixed to the units by the manufacturer. This information shall be kept readily accessible and made available upon request by the Technical Secretary or a Division representative. If the permittee wishes to increase or modify the design heat input capacity of the dryers, a construction permit shall be applied for and received in accordance with TAPCR 1200-03-09-.01(1) prior to making the change.

- B. Only natural gas shall be used as fuel for the dryers. The dryers are only capable of burning this fuel. Should the permittee need to modify the dryers to allow the use of a fuel other than natural gas, a construction permit shall first be applied for and received in accordance with TAPCR 1200-03-09-.03(8) and the application dated October 21, 2021.

TAPCR 1200-03-09-.03(8) and the application with date October 21, 2021

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

E8-2. Emission Limitation(s)

- A. Particulate matter (PM) emitted from this source shall not exceed 0.01 lbs/hr, daily average basis.

TAPCR 1200-03-07-.01(5) and the application with date October 21, 2021

Compliance Method: Compliance with this emission limitation is assured by compliance with **Conditions E8-1A and E8-1B** and the emission factor of 7.6 lbs/10⁶ Ft³ from AP-42, Chapter 1 table 1.4-2.

- B. Sulfur Dioxide (SO₂) emitted from this source shall not exceed 0.001 lbs per hour, daily average basis.

TAPCR 1200-03-14-.03(5) and the application with date October 21, 2021

Compliance Method: Compliance with this emission limitation is assured by compliance with **Conditions E8-1A and E8-1B** and the emission factor of 0.6 lbs/10⁶ Ft³ from AP-42, Chapter 1, table 1.4-2.

- C. Nitrogen Oxide (NO_x) emitted from this source shall not exceed 0.81 tons per all intervals of 12 consecutive months.

TAPCR 1200-03-07-.07(2) and the application with date October 21, 2021

Compliance Method: Compliance with this emission limitation is assured by compliance with **Conditions E8-1A and E8-1B** and the emission factor of 100 lbs/10⁶ Ft³ from AP-42, Chapter 1, table 1.4-1.

- E8-3.** This source is subject to and shall comply with the standards applicable to flexographic printing presses under TAPCR 1200-03-18-.35, Graphic Arts System.

TAPCR 1200-03-18-.35(3)

Compliance Method: The operator of this source has elected to show compliance with this standard through the use of compliant coatings and inks with a VOC content equal to or less than 0.5 pound VOC per pound coating (excluding clean-up solvents) or ink solids, as applied. The VOC content of the coatings and inks will be recorded in the logs required by **Condition E4-3**. Alternatively, the permittee may comply by calculating the weighted average as specified in TAPCR 1200-03-18-.35(4).

END OF TITLE V PERMIT NUMBER: 580324

ATTACHMENT 1

**OPACITY MATRIX DECISION TREE for
VISIBLE EMISSION EVALUATION METHOD 9
DATED JUNE 18, 1996 AND AMENDED SEPTEMBER 11, 2013**

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

Notes:

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

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

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

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

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

Typical Pollutants

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

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

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

Reader Error

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

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

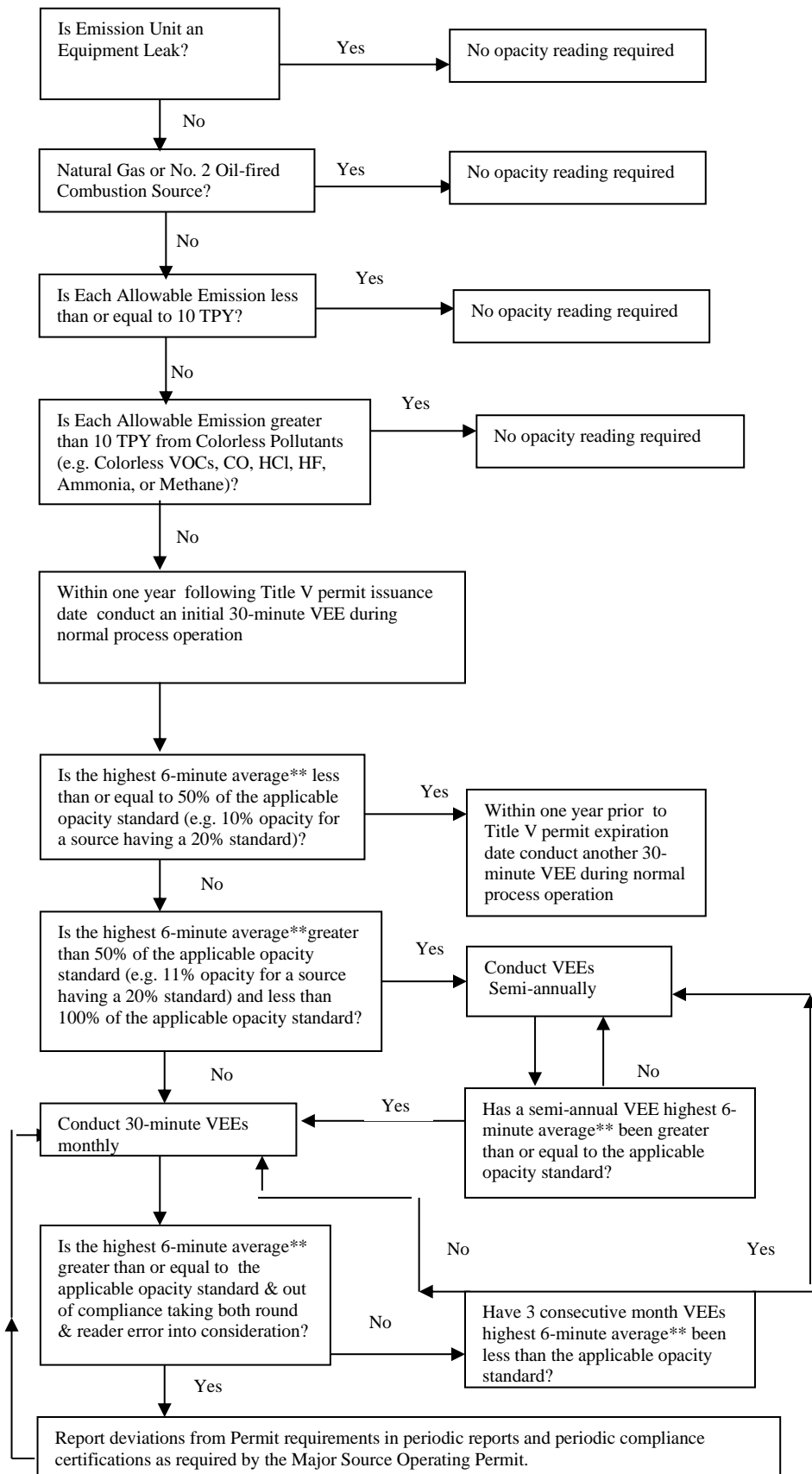
EPA Method 9, NSPS or NESHAPS stipulate opacity standards:

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

*Not applicable to Asbestos manufacturing subject to 40 CFR 61.142

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

DATED JUNE 18, 1996
AMENDED SEPTEMBER 11, 2013



ATTACHMENT 2

**AP-42 Emission Factors from Natural Gas Combustion,
Supplement to 5th Edition, Dated 7/98,
Liquefied Petroleum Gas Combustion, Dated 10/96
& Fuel Oil Combustion, 5th Edition, Dated 10/96**

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

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

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

^b Expressed as NO₂. For large and small wall fired boilers with SNCR control, apply a 24 percent reduction to the appropriate NO_x emission factor. For tangential-fired boilers with SNCR control, apply a 13 percent reduction to the appropriate NO_x emission factor.

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

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

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

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

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

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

^d Based on 100% conversion of fuel sulfur to SO₂.

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

Table 1.3-1. CRITERIA POLLUTANT EMISSION FACTORS FOR FUEL OIL COMBUSTION^a

Firing Configuration (SCC) ^a	SO ₂ ^b		SO ₃ ^c		NO _x ^d		CO ^e		Filterable PM ^f	
	Emission Factor (lb/10 ³ gal)	EMISSION FACTOR RATING	Emission Factor (lb/10 ³ gal)	EMISSION FACTOR RATING	Emission Factor (lb/10 ³ gal)	EMISSION FACTOR RATING	Emission Factor (lb/10 ³ gal)	EMISSION FACTOR RATING	Emission Factor (lb/10 ³ gal)	EMISSION FACTOR RATING
Boilers > 100 Million Btu/hr										
No. 6 oil fired, normal firing (1-01-004-01), (1-02-004-01), (1-03-004-01)	157S	A	5.7S	C	47	A	5	A	9.19(S)+3.22	A
No. 6 oil fired, normal firing, low NO _x burner (1-01-004-01), (1-02-004-01)	157S	A	5.7S	C	40	B	5	A	9.19(S)+3.22	A
No. 6 oil fired, tangential firing, (1-01-004-04)	157S	A	5.7S	C	32	A	5	A	9.19(S)+3.22	A
No. 6 oil fired, tangential firing, low NO _x burner (1-01-004-04)	157S	A	5.7S	C	26	E	5	A	9.19(S)+3.22	A
No. 5 oil fired, normal firing (1-01-004-05), (1-02-004-04)	157S	A	5.7S	C	47	B	5	A	10	B
No. 5 oil fired, tangential firing (1-01-004-06)	157S	A	5.7S	C	32	B	5	A	10	B
No. 4 oil fired, normal firing (1-01-005-04), (1-02-005-04)	150S	A	5.7S	C	47	B	5	A	7	B
No. 4 oil fired, tangential firing (1-01-005-05)	150S	A	5.7S	C	32	B	5	A	7	B
No. 2 oil fired (1-01-005-01), (1-02-005-01), (1-03-005-01)	157S	A	5.7S	C	24	D	5	A	2	A
No.2 oil fired, LNB/FGR, (1-01-005-01), (1-02-005-01), (1-03-005-01)	157S	A	5.7S	A	10	D	5	A	2	A

Table 1.3-1. (cont.)

Firing Configuration (SCC) ^a	SO ₂ ^b		SO ₃ ^c		NO _x ^d		CO ^e		Filterable PM ^f	
	Emission Factor (lb/10 ³ gal)	EMISSION FACTOR RATING	Emission Factor (lb/10 ³ gal)	EMISSION FACTOR RATING	Emission Factor (lb/10 ³ gal)	EMISSION FACTOR RATING	Emission Factor (lb/10 ³ gal)	EMISSION FACTOR RATING	Emission Factor (lb/10 ³ gal)	EMISSION FACTOR RATING
Boilers < 100 Million Btu/hr										
No. 6 oil fired (1-02-004-02/03) (1-03-004-02/03)	157S	A	2S	A	55	A	5	A	10	B
No. 5 oil fired (1-03-004-04)	157S	A	2S	A	55	A	5	A	9.19(S)+3.22	A
No. 4 oil fired (1-03-005-04)	150S	A	2S	A	20	A	5	A	7	B
Distillate oil fired (1-02-005-02/03) (1-03-005-02/03)	142S	A	2S	A	20	A	5	A	2	A
Residential furnace (A2104004/A2104011)	142S	A	2S	A	18	A	5	A	0.4 ^g	B

^a To convert from lb/10³ gal to kg/10³ L, multiply by 0.120. SCC = Source Classification Code.

^b References 1-2,6-9,14,56-60. S indicates that the weight % of sulfur in the oil should be multiplied by the value given. For example, if the fuel is 1% sulfur, then S = 1.

^c References 1-2,6-8,16,57-60. S indicates that the weight % of sulfur in the oil should be multiplied by the value given. For example, if the fuel is 1% sulfur, then S = 1.

^d References 6-7,15,19,22,56-62. Expressed as NO₂. Test results indicate that at least 95% by weight of NO_x is NO for all boiler types except residential furnaces, where about 75% is NO. For utility vertical fired boilers use 105 lb/10³ gal at full load and normal (>15%) excess air. Nitrogen oxides emissions from residual oil combustion in industrial and commercial boilers are related to fuel nitrogen content, estimated by the following empirical relationship: lb NO₂/10³ gal = 20.54 + 104.39(N), where N is the weight % of nitrogen in the oil. For example, if the fuel is 1% nitrogen, then N = 1.

^e References 6-8,14,17-19,56-61. CO emissions may increase by factors of 10 to 100 if the unit is improperly operated or not well maintained.

^f References 6-8,10,13-15,56-60,62-63. Filterable PM is that particulate collected on or prior to the filter of an EPA Method 5 (or equivalent) sampling train. Particulate emission factors for residual oil combustion are, on average, a function of fuel oil sulfur content where S is the weight % of sulfur in oil. For example, if fuel oil is 1% sulfur, then S = 1.

^g Based on data from new burner designs. Pre-1970's burner designs may emit filterable PM as high as 3.0 lb/10³ gal.

Table 1.3-2. CONDENSABLE PARTICULATE MATTER EMISSION FACTORS FOR OIL COMBUSTION^a

Firing Configuration ^b (SCC)	Controls	CPM – TOT ^{c,d}		CPM-IOR ^{c,d}		CPM-ORG ^{c,d}	
		Emission Factor (lb/10 ³ gal)	EMISSION FACTOR RATING	Emission Factor (lb/10 ³ gal)	EMISSION FACTOR RATING	Emission Factor (lb/10 ³ gal)	EMISSION FACTOR RATING
No. 2 oil fired (1-01-005-01, 1-02-005-01, 1-03-005-01)	All controls, or uncontrolled	1.3 ^{d,e}	D	65% of CPM-TOT emission factor ^c	D	35% of CPM-TOT emission factor ^c	D
No. 6 oil fired (1-01-004-01/04, 1-02-004-01, 1-03-004-01)	All controls, or uncontrolled	1.5 ^f	D	85% of CPM-TOT emission factor ^d	E	15% of CPM-TOT emission factor ^d	E

a All condensable PM is assumed to be less than 1.0 micron in diameter.

b No data are available for numbers 3,4, and 5 oil. For number 3 oil, use the factors provided for number 2 oil. For numbers 4 and 5 oil, use the factors provided for number 6 oil.

c CPM-TOT = total condensable particulate matter.

CPM-IOR = inorganic condensable particulate matter.

CPM-ORG = organic condensable particulate matter.

d To convert to lb/MMBtu of No. 2 oil, divide by 140 MMBtu/10³ gal. To convert to lb/MMBtu of No. 6 oil, divide by 150 MMBtu/10³ gal.

e References 76-78.

References 79-82

Table 1.3-3. EMISSION FACTORS FOR TOTAL ORGANIC COMPOUNDS (TOC), METHANE, AND NONMETHANE TOC (NMTOC) FROM UNCONTROLLED FUEL OIL COMBUSTION^a

EMISSION FACTOR RATING: A

Firing Configuration (SCC)	TOC ^b Emission Factor (lb/10 ³ gal)	Methane ^b Emission Factor (lb/10 ³ gal)	NMTOC ^b Emission Factor (lb/10 ³ gal)
Utility boilers			
No. 6 oil fired, normal firing (1-01-004-01)	1.04	0.28	0.76
No. 6 oil fired, tangential firing (1-01-004-04)	1.04	0.28	0.76
No. 5 oil fired, normal firing (1-01-004-05)	1.04	0.28	0.76
No. 5 oil fired, tangential firing (1-01-004-06)	1.04	0.28	0.76
No. 4 oil fired, normal firing (1-01-005-04)	1.04	0.28	0.76
No. 4 oil fired, tangential firing (1-01-005-05)	1.04	0.28	0.76
Industrial boilers			
No. 6 oil fired (1-02-004-01/02/03)	1.28	1.00	0.28
No. 5 oil fired (1-02-004-04)	1.28	1.00	0.28
Distillate oil fired (1-02-005-01/02/03)	0.252	0.052	0.2
No. 4 oil fired (1-02-005-04)	0.252	0.052	0.2
Commercial/institutional/residential combustors			
No. 6 oil fired (1-03-004-01/02/03)	1.605	0.475	1.13
No. 5 oil fired (1-03-004-04)	1.605	0.475	1.13
Distillate oil fired (1-03-005-01/02/03)	0.556	0.216	0.34
No. 4 oil fired (1-03-005-04)	0.556	0.216	0.34
Residential furnace (A2104004/A2104011)	2.493	1.78	0.713

^a To convert from lb/10³ gal to kg/10³ L, multiply by 0.12. SCC = Source Classification Code.

^b References 29-32. Volatile organic compound emissions can increase by several orders of magnitude if the boiler is improperly operated or is not well maintained.

Table 1.5-1. EMISSION FACTORS FOR LPG COMBUSTION^a

EMISSION FACTOR RATING: E

Pollutant	Butane Emission Factor (lb/10 ³ gal)		Propane Emission Factor (lb/10 ³ gal)	
	Industrial Boilers ^b (SCC 1-02-010-01)	Commercial Boilers ^c (SCC 1-03-010-01)	Industrial Boilers ^b (SCC 1-02-010-02)	Commercial Boilers ^c (SCC 1-03-010-02)
PM ^d	0.6	0.5	0.6	0.4
SO ₂ ^e	0.09S	0.09S	0.10S	0.10S
NO _x ^f	21	15	19	14
N ₂ O ^g	0.9	0.9	0.9	0.9
CO ₂ ^{h,j}	14,300	14,300	12,500	12,500
CO	3.6	2.1	3.2	1.9
TOC	0.6	0.6	0.5	0.5
CH ₄ ^k	0.2	0.2	0.2	0.2

^a Assumes emissions (except SO_x and NO_x) are the same, on a heat input basis, as for natural gas combustion. The NO_x emission factors have been multiplied by a correction factor of 1.5, which is the approximate ratio of propane/butane NO_x emissions to natural gas NO_x emissions. To convert from lb/10³ gal to kg/10³ L, multiply by 0.12. SCC = Source Classification Code.

^b Heat input capacities generally between 10 and 100 million Btu/hour.

^c Heat input capacities generally between 0.3 and 10 million Btu/hour.

^d Filterable particulate matter (PM) is that PM collected on or prior to the filter of an EPA Method 5 (or equivalent) sampling train. For natural gas, a fuel with similar combustion characteristics, all PM is less than 10 µm in aerodynamic equivalent diameter (PM-10).

^e S equals the sulfur content expressed in gr/100 ft³ gas vapor. For example, if the butane sulfur content is 0.18 gr/100 ft³, the emission factor would be (0.09 × 0.18) = 0.016 lb of SO₂/10³ gal butane burned.

^f Expressed as NO₂.

^g Reference 12.

^h Assuming 99.5% conversion of fuel carbon to CO₂.

^j EMISSION FACTOR RATING = C.

^k Reference 13.

ATTACHMENT 3

TITLE V FEE SELECTION FORM:

FORM APC 36



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

APC 36

TITLE V FEE SELECTION

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

[illegible]

ATTACHMENT 4

Example logs

PRINTING MATERIALS VOC/HAP CONTENT AND EMISSION LOG FOR SOURCE

MONTH: ____

Material Name	Material Usage (lbs)	VOC Content (percent by weight, as applied)	VOC Content (pound VOC per pound coating or ink solids, as applied)	HAP 1 Content (percent by weight)	HAP 2 Content (percent by weight)	Total HAP Content (percent by weight)	HAP 1 Emissions (tons/mo)	HAP 2 Emissions (tons/mo)	Total HAP Emissions (tons/mo)	VOC Emissions (tons/mo)
Material 1										
Material 2										
Material 3										
Totals										

VOC Emissions							
Month/Year	Ink (tons/month)	Natural gas combustion (Boiler, Comfort heating) (tons/month)	Fire Pump (tons/month)	Diesel tank (tons/month)	Propane combustions (welder) (tons/month)	Total (tons/month)	Total (tons/ 12 consecutive months)

Monthly Fuel Combusted or Delivered Log

Fuel Log								
Month/Year	Natural Gas Combusted (ccf/mo. or mcf/mo.)	No. 2 Fuel Oil Combusted			Natural Gas Delivered (ccf/mo. or mcf/mo.)	No. 2 Fuel Oil Delivered (gal/mo.)		
		Testing	Maintenance	Operator Training		Testing	Maintenance	Operator Training

ATTACHMENT 5

AGREEMENT LETTER



August 18, 2017

APC RCU0

22 AUG 2017 AM 11:55

Mr. Moe Baghernejad
Environmental Protection Specialist, Air Pollution Control
Tennessee Department of Environment & Conservation
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, Tennessee 37243

RE: Plus Mark LLC (30-0132)
Title V Operating Permit – Letter of Agreement on revised conditions

Dear Mr. Baghernejad:

Per our discussions regarding the input rates and the emissions limits, Plus Mark LLC agrees to the following conditions which will be incorporated into the Title V operating permit for our facility:

- The Maximum VOC emissions from the facility will not exceed 249.0 tons per all intervals of twelve consecutive months,
- Single HAP emissions will not exceed 9.9 tons per all intervals of twelve consecutive months,
- Combined HAP emissions will not exceed 24.9 tons per all intervals of twelve consecutive months,
- The Maximum material input rate for ink and solvent combined shall not exceed 1,460,000 pounds per month.

If you have any questions about this information, please contact Tom E. DuBois at (423) 639-7878, Ext. 2175 or tom.dubois@amgreetings.com.

RESPONSIBLE OFFICIAL CERTIFICATION

I, the undersigned, am the responsible official as defined in TAPCR 1200-3-9-.02 (11)(b)21. of the Title V source for which this document is being submitted. I hereby certify, based on the information and belief formed after reasonable inquiry that the statements made and data contained in this document are true, accurate, and complete.

Signature: Scott Crawford

Name: Scott Crawford

Title: Plant Manager

Date: 8/18/17

ATTACHMENT 6

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

ATTACHMENT 7

General Provision for 40 CFR Part 60, Subpart IIII

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

General provisions citation 40 CFR	Subject of citation	Applies to subpart	Explanation
§60.1	General applicability of the General Provisions	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.2	Definitions	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.3	Units and abbreviations	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.4	Address	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.5	Determination of construction or modification	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.6	Review of plans	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.7	Notification and Recordkeeping	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.8	Performance tests	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Except that § 60.8 only applies to stationary CI ICE with a displacement of (≥30 liters per cylinder and engines that are not certified.
§60.9	Availability of information	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.10	State Authority	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.11	Compliance with standards and maintenance requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Requirements are specified in subpart IIII.
§60.12	Circumvention	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.13	Monitoring requirements	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Except that § 60.13 only applies to stationary CI ICE with a displacement of (≥30 liters per cylinder.
§60.14	Modification	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.15	Reconstruction	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.16	Priority list	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.17	Incorporations by reference	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.18	General control device requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§60.19	General notification and reporting requirements	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

ATTACHMENT 8

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 <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§63.2	Definitions	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§63.3	Units and Abbreviations	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§63.4	Prohibited Activities and Circumvention	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.5	Preconstruction Review and Notification Requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.6(a), (b), (c)	Compliance with Standards and Maintenance Requirements—Applicability Compliance Dates	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.6(e)	Operation and Maintenance Requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.6(f), (g), (i), (j)	Compliance with Non-opacity Emission Standards	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.7(a), (e), (f), (g), (h)	Performance Testing Requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.8	Monitoring Requirements	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§63.9	Notification Requirements	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§63.10	Recordkeeping and Reporting Requirements	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§63.11	Control Device Requirements	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§63.12	State Authorities and Delegations	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§63.13	Addresses	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§63.14	Incorporations by Reference	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§63.15	Availability of Information and Confidentiality	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§63.16	Performance Track Provisions	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	