MAJOR SOURCE OPERATING PERMIT

301-0059

HOOD PACKAGING CORP.

HOOD PACKAGING CORP.

ANNISTON, CALHOUN COUNTY, AL

PERMITTEE:

FACILITY NAME:

FACILITY NO.:

LOCATION:

<u>Ala. Code</u> §§ 22-28-1 to 22-28-23, as am §§ 22-22A-1 to 22-22A-17, as amended, a	the provisions of the Alabama Air Pollution Control Act of 1971, nended, the Alabama Environmental Management Act, <u>Ala. Code and rules and regulations adopted there under</u> , and subject further the Permittee is hereby authorized to construct, install, and operate acribed above.
EPA, the Alabama Department of Enviro which are not required under the Clean A	f 1990, all conditions of this permit are federally enforceable by inmental Management, and citizens in general. Those provisions Air Act of 1990 are considered to be State Permit Provisions and I citizens in general. Those Provisions are contained in separate
ISSUANCE DRAFT DATE:	
EFFECTIVE DATE: DRAFT	
EXPIRATION DATE: DRAFT	
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General Permit Provisos

Federally Enforceable Provisos	Regulations
1. Transfer	
This Permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another, except as provided in ADEM Admin. Code R. 335-3-1613(1)(a)5.	ADEM Admin. Code R. 335-3-1602(6)
2. Renewals	
(a) An application for permit renewal shall be submitted at least six (6) months, but not more than eighteen (18) months, before the date of expiration of this Permit.	ADEM Admin. Code R. 335-3-1612(2)
(b) The source for which this Permit is issued shall lose its right to operate upon the expiration of this Permit unless a timely and complete renewal application has been submitted within the time constraints listed in the previous paragraph.	
3. Severability Clause	
The provisions of this Permit are declared to be severable and if any section, paragraph, subparagraph, subdivision, clause, or phrase of this Permit shall be adjudged to be invalid or unconstitutional by any court of competent jurisdiction, the judgment shall not affect, impair, or invalidate the remainder of this Permit, but shall be confined in its operation to the section, paragraph, subparagraph, subdivisions, clause, or phrase of this Permit that shall be directly involved in the controversy in which such judgment shall have been rendered.	ADEM Admin. Code R. 335-3-1605(e)
4. Compliance	
(a) The permittee shall comply with all conditions of ADEM Admin. Code r. 335-3. Noncompliance with this Permit will constitute a violation of the Clean Air Act of 1990 and ADEM Admin. Code r. 335-3 and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance, or modification; or denial of a permit renewal application by the permittee.	ADEM Admin. Code R. 335-3-1605(f)
(b) The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this Permit would have required halting or reducing the permitted activity.	ADEM Admin. Code R. 335-3-1605(g)
5. Termination for Cause	
This 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 will not stay any permit condition.	ADEM Admin. Code R. 335-3-1605(h)
6. Property Rights	
The issuance of this Permit does not convey any property rights of any sort, or any exclusive privilege.	ADEM Admin. Code R. 335-3-1605(i)

Federally Enforceable Provisos	Regulations
7. Submission of Information	
The permittee must submit to the Department, within 30 days or for such other reasonable time as the Department may set, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this Permit or to determine compliance with this Permit. Upon receiving a specific request, the permittee shall also furnish to the Department copies of records required to be kept by this Permit.	335-3-1605(j)
8. Economic Incentives, Marketable Permits, and Emissions Trading	
No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this Permit.	ADEM Admin. Code R. 335-3-1605(k)
9. Certification of Truth, Accuracy, and Completeness:	
Any application form, report, test data, monitoring data, or compliance certification submitted pursuant to 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.	335-3-1607(a)
10. Inspection and Entry	
Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the Alabama Department of Environmental Management and EPA to conduct the following:	ADEM Admin. Code R. 335-3-1607(b)
(a) Enter upon the permittee's premises where a source is located or emissions- related activity is conducted, or where records must be kept pursuant to the conditions of this Permit;	
(b) Review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of this Permit;	
(c) Inspect, at reasonable times, this facility's equipment (including monitoring equipment and air pollution control equipment), practices, or operations regulated or required pursuant to this Permit; and	
(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this Permit or other applicable requirements.	
11. Compliance Provisions	
(a) The permittee shall continue to comply with the applicable requirements with which the company has certified that it is already in compliance.	ADEM Admin. Code R. 335-3-1607(c)
(b) The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this Permit.	

Federally Enforceable Provisos		Regulations	
12. Con	npliance Certification		
(a)	A compliance certification shall be submitted annually within 60 days of the anniversary date of issuance of this Permit.	ADEM Admin. Code R. 335-3-1607(e)	
	(1) The compliance certification shall include the following:		
	(i) The identification of each term or condition of this Permit that is the basis of the certification;		
	(ii) The compliance status;		
	 (iii) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with ADEM Admin. Code R. 335-3-1605(c) (Monitoring and Recordkeeping Requirements); 		
	(iv) Whether compliance has been continuous or intermittent; and		
	(v) Such other facts as the Department may require to determine the compliance status of the source;		
	(2) The compliance certification shall be submitted to:		
	Alabama Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463		
	and to:		
	Enforcement and Compliance Assurance Division EPA Region IV 61 Forsyth Street, SW Atlanta, GA 30303		
13. Red	pening for Cause		
	er any of the following circumstances, this Permit will be reopened prior to the ration of the permit:	ADEM Admin. Code R. 335-3-1613(5)	
(a)	Additional applicable requirements under the Clean Air Act of 1990 become applicable to the permittee with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this Permit is due to expire.		
(b)	Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into this Permit.		
(c)	The Department or EPA determines that this Permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this Permit.		

Federally Enforceable Provisos		Regulations
(d) The Administrator or the Department determines that this Permit must be revised or revoked to assure compliance with the applicable requirements.		
14. Additional Rules and Regulations		
This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.		§22-28-16(d), <u>Code of</u> <u>Alabama 1975</u> , as amended
15. Equ	ipment Maintenance or Breakdown	
(a)	In case of shutdown of air pollution control equipment (which operates pursuant to any permit issued by the Director) for scheduled maintenance, the intent to shut down shall be reported to the Department at least 24 hours prior to the planned shutdown, unless such shutdown is accompanied by the shutdown of the source which such equipment is intended to control. Such prior notice shall include, but is not limited to the following:	ADEM Admin. Code R. 335-3-107(1),(2)
	(1) Identification of the specific facility to be taken out of service as well as its location and permit number;	
	(2) The expected length of time that the air pollution control equipment will be out of service;	
	(3) The nature and quantity of emissions of air contaminants likely to occur during the shutdown period;	
	(4) Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period; and	
	(5) The reasons that it would be impossible or impractical to shut down the source operation during the maintenance period.	
(b)	In the event that there is a breakdown of equipment or upset of process in such a manner as to cause, or is expected to cause, increased emissions of air contaminants which are above an applicable standard, the person responsible for such equipment shall notify the Director within 24 hours or the next working day and provide a statement giving all pertinent facts, including the estimated duration of the breakdown. The Director shall be notified when the breakdown has been corrected.	
16. Ope	ration of Capture and Control Devices	
shall emiss prope	ir pollution control devices and capture systems for which this Permit is issued be maintained and operated at all times in a manner so as to minimize the sions of air contaminants. Procedures for ensuring that the above equipment is erly operated and maintained so as to minimize the emission of air contaminants be established.	§22-28-16(d), <u>Code of</u> <u>Alabama 1975</u> , as amended

Federally Enforceable Provisos	Regulations
17. Obnoxious Odors	
This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.	ADEM Admin. Code R. 335-3-108
18. Fugitive Dust	
Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.	ADEM Admin. Code R. 335-3-402
Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds:	
(a) By the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;	
(b) By reducing the speed of vehicular traffic to a point below that at which dust emissions are created;	
(c) By paving;	
(d) By the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions; or	
Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Department prior to utilization.	
19. Additions and Revisions	
Any modifications to this source shall comply with the modification procedures in ADEM Admin. Code R. 335-3-1613 or 335-3-1614.	ADEM Admin. Code R. 335-3-1613 & .14
20. Recordkeeping Requirements	
(a) Records of required monitoring information of the source shall include the following:	ADEM Admin. Code R. 335-3-1605(c)2
(1) The date, place, and time of all sampling or measurements;	
(2) The date analyses were performed;	
(3) The company or entity that performed the analyses;	
(4) The analytical techniques or methods used;	

Federal	ly Enforceable Provisos	Regulations
	(5) The results of all analyses; and	_
	(6) The operating conditions that existed at the time of sampling or measurement.	
(b)	Retention of records of all required monitoring data and support information of the source 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	
21. Rep	orting Requirements	
(a)	Reports to the Department of any required monitoring shall be submitted at least every 6 months. All instances of deviations from permit requirements must be clearly identified in said reports. All required reports must be certified by a responsible official consistent with ADEM Admin. Code R. 335-3-1604(9).	ADEM Admin. Code R. 335-3-1605(c)3
(b)	Deviations from permit requirements shall be reported within 48 hours or 2 working days of such deviations, including those attributable to upset conditions as defined in the permit. The report will include the probable cause of said deviations, and any corrective actions or preventive measures that were taken.	
22. Em	ission Testing Requirements	
ladde acco	point of emission which requires testing will be provided with sampling ports, ers, platforms, and other safety equipment to facilitate testing performed in rdance with procedures established by Part 60 of Title 40 of the Code of Federal slations, as the same may be amended or revised.	ADEM Admin. Code R. 335-3-105(3) ADEM Admin. Code R. 335-3-104(1)
emis	Air Division must be notified in writing at least 10 days in advance of all sion tests to be conducted and submitted as proof of compliance with the artment's air pollution control rules and regulations.	
	void problems concerning testing methods and procedures, the following shall cluded with the notification letter:	
(a)	The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, hoe many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.	ADEM Admin. Code R. 335-3-104
(b)	A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedures require probe cleaning).	
(c)	A description of the process(es) to be tested including the feed rate, any operating parameters used to control or influence the operations, and the rated capacity.	

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(d) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.	
A pretest meeting may be held at the request of the source owner or the Air Division. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.	ADEM Admin. Code R. 335-3-104
All test reports must be submitted to the Air Division within 30 days of the actual completion of the test unless an extension of time is specifically approved by the Air Division.	
23. Payment of Emission Fees	
The permittee shall remit the annual Operating Permit Fees required by ADEM Admin. Code r. 335-1-704 according to the schedule in ADEM Admin. Code r. 335-1-705.	ADEM Admin. Code R. 335-1-704
The permittee shall submit its estimate of actual emissions for the previous calendar year according to the schedule in ADEM Admin. Code r. 335-1-705.	ADEM Admin. Code R. 335-1-705
24. Other Reporting and Testing Requirements	
Submission of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require emission testing at any time.	ADEM Admin. Code R. 335-3-104(1)
25. Title VI Requirements (Refrigerants)	
Any facility having appliances or refrigeration equipment, including air conditioning equipment, which use Class I or Class II ozone-depleting substances as listed in Appendices A and B to Subpart A of 40 CFR Part 82 shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82, Subpart F.	40 CFR Part 82, Subpart F
(a) No person shall knowingly vent or otherwise release any Class I or Class II substance into the environment during the repair, servicing, maintenance, or disposal of any device except as provided in 40 CFR Part 82, Subpart F.	
(b) The responsible official shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the US EPA and the Department as required.	
26. Chemical Accidental Prevention Provisions	
If a chemical listed in Table 1 of 40 CFR 68.130 is present in a process in quantities greater than the threshold quantity listed in Table 1, then:	40 CFR Part 68
(a) The owner or operator shall comply with the provisions in 40 CFR Part 68.	
(b) The owner or operator shall submit one of the following:	

Federally Enforceable Provisos	Regulations		
(1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or			
(2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan.			
27. Display of Permit			
This Permit shall be kept under file or on display at all times at the site where This facility for which this Permit is issued is located and will make the permit readily available for inspection by any or all persons who may request to see it.	ADEM Admin. Code R. 335-3-1401(1)(d)		
28. Circumvention			
No person shall cause or permit the installation or use of any device or any means which, without resulting in the reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate the Division 3 rules and regulations.	ADEM Admin. Code R. 335-3-110		
29. Visible Emissions			
Unless otherwise specified in the Unit Specific provisos of this Permit, any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by Method 9 of Appendix A-4 to 40 CFR Part 60, unless otherwise specified in the Unit Specific Provisos of this Permit.	ADEM Admin. Code R. 335-3-401(1)		
30. Fuel-Burning Equipment			
(a) Unless otherwise specified in the Unit Specific provisos of this Permit, no fuel-burning equipment may discharge particulate emissions in excess of the emissions specified in ADEM Admin. Code R. 335-3-403.	ADEM Admin. Code R. 335-3-403		
(b) Unless otherwise specified in the Unit Specific provisos of this Permit, no fuel-burning equipment may discharge sulfur dioxide emissions in excess of the emissions specified in ADEM Admin. Code R. 335-3-501.	ADEM Admin. Code R. 335-3-501		
31. Process Industries – General			
Unless otherwise specified in the Unit Specific provisos of this Permit, no process may discharge particulate emissions in excess of the emissions specified in ADEM Admin. Code R. 335-3-404.	ADEM Admin. Code R. 335-3-404		
32. Averaging Time for Emission Limits			
Unless otherwise specified in the permit, the averaging time for the emission limits listed in this Permit shall be the nominal time required by the specific test method.	ADEM Admin. Code R. 335-3-105		

Federally Enforceable Provisos	Regulations
33. Open Burning	
Precautions should be taken to ensure that no person shall ignite, cause to ignite, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.	ADEM Admin. Code R. 335-3-301

Operating Permit Summary No. 1

Emission Unit(s): 001 **Designation No(s). in Application:** Line 001

Company: Hood Packaging Corporation

Description: Two (2) Flexographic Printing Press Lines and

Associated Equipment: Line No. #1 - Uteco Onyx (10-color) water/solvent based, and Line No. #2 -

Uteco Onyx (10-color) water/solvent based

Permitted Operating Schedule: 24 hr/day x 365 days/yr. = 8760 hr/yr.

Type and quantity of fuel used:Primary: Natural Gas

Secondary: None

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	227.0 tons any rolling 12 month	SYNTHETIC MINOR PSD
	period	
HAP/HAPs	9.0/24.0 tons any rolling 12	SYNTHETIC MINOR HAP
	month period facility wide	LIMITS

Unit Specific Provisos

Federally Enforceable Provisos Section 1 Applicability		Regulations
2.	This source is subject to a PSD synthetic minor emission limitation.	ADEM Admin. Code R. 335-3-1404
3.	This source is subject to synthetic minor limitations for Hazardous Air Pollutants.	ADEM Admin. Code R. 335-3-14
Sect	ion 2 – Emission Standards	
1.	Emissions of Volatile Organic Compounds (VOCs) from Unit 001 shall not exceed 227.0 tons per year (TPY) in any consecutive rolling 12-month period.	ADEM Admin. Code R. 335-3-1404(8)
2.	Emissions of Hazardous Air Pollutants (HAPs) from this facility shall not exceed 9.0 tons for any single HAP nor 24.0 tons for any combination of HAPs during any consecutive 12-month period.	ADEM Admin. Code R. 335-3-1106(36)
Sect	ion 3 – Compliance and Performance Test Methods and Procedures	
1.	The HAPs content by weight of each HAPs containing material used shall be determined using EPA Test Method 311, as defined in 40 CFR 63, Appendix A. Vendor data based on this method is an appropriate substitute.	ADEM Admin. Code R. 335-3-1106(35)
2.	The VOC content by weight of each VOC containing material used shall be determined using EPA Test Method 24, as defined in 40 CFR 60, Appendix A. Vendor data based on this method is an appropriate substitute.	ADEM Admin. Code R. 335-3-104
Sect	ion 4Emission Monitoring	
1.	The monitoring requirements in this permit shall be as required in Section 5Recordkeeping and Reporting Requirements.	
Sect	ion 5Recordkeeping and Reporting Requirements	
1.	Accurate and understandable records of consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting	ADEM Admin. Code R. 335-3-104

Federally En	nforceable Provisos	Regulations	
	round documents upon request that pertain to this air permit. records shall contain the following information:		
(a)	The type and quantity of each VOC and HAP containing material used by the flexographic press.		
(b)	The VOC, HAP and water content shall be determined from the evaluation data supplied by the ink manufacturer with each shipment of purchased raw inks and related coatings used.		
(c)	The percent by volume of VOCs, water, solids, HAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.		
(d)	Compliance with VOC and HAP limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC and HAP content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in advance.		
(e)	Complete inventories of the VOC and HAP containing materials (their usage, VOC content and HAP content) shall be made at the end of each calendar month.		
(f)	The amount of VOCs emitted per calendar month from the coating and cleaning operations in units of pounds and tons.		
(g)	The rolling 12-month total of VOCs emitted from the coating and cleaning operations in units of pounds and tons.		
(h)	Within the first 15 days of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Air Division must be notified in writing within ten (10) days of the identification of the exceedance.	ADEM Admin. Code R. 335-3-104	
A report summarizing the information in proviso 5.1 shall be submitted each calendar quarter by the 15th day of the month following the end of the quarter, in a format approved by the Department in advance. ADEM Admin 335-3-104			