

DRAFT TITLE V PERMIT STATEMENT - RENEWAL

Facility Name: Holliston Holdings, LLC

City: Church Hill

County: Hawkins

Date Application Received: July 26, 2022

Date Application Deemed Complete: July 26, 2022

Emission Source Reference No.: 37-0001

Permit No.: 580610

INTRODUCTION

This narrative is being provided to assist the reader in understanding the content of the attached Renewal Title V operating permit. This Title V Permit Statement is written pursuant to Tennessee Air Pollution Control Rule 1200-03-09-.02(11)(f)1.(v). The primary purpose of the Title V operating permit is to consolidate and identify existing state and federal air requirements applicable to **Holliston Holdings, LLC** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the Title V Operating Permit. It initially describes the facility receiving the permit, then the applicable requirements and their significance, and finally the compliance status with the applicable requirements. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public participation process will be described in an addendum to this narrative.

Acronyms

PSD - Prevention of Significant Deterioration

NESHAP - National Emission Standards for Hazardous Air Pollutants

NSPS - New Source Performance Standards

MACT - Maximum Achievable Control Technology

NSR - New Source Review

I. Identification Information

A. Source Description

List and describe emission source(s): Book Cover Printing/Coating Operation consisting of Steam Generating Boiler Installation with one (1) 39 MMBtu/hr Boiler (Source 02), Waste Paper Trim System (Source 04), Coating Operation with Drying Ovens (Source 10), Steam Generating Boiler Installation consisting of one (1) 29.41 MM Btu/hr Boiler (Source 12) and Eight (8) each, 0.8 MMBtu/hr Heaters – Zone gas fired convection Tenter Drying Ovens frame with pin clips (Source 16).

Permitting Activities since Original Permit Issuance (Previous Permit 559975)

Revisions dated May 20, 1999, April 26, 2000

Additional Information dated August 14, 2003 and July 22, 2005

Additional Information dated June 11, 1998 (VOC RACT Determination)

Administrative permit amendment No. 1, responsible official name change letter May 2, 2006

Administrative permit amendment No. 2, responsible official name change letter May 16, 2007

Administrative permit amendment No. 3, Ownership/Name Change to Holliston LLC letter August 24, 2007

New Boiler construction permit #957967F dated March 14, 2005 and subsequent amendments

Removal of one (1) 79.2 MMBTU/hr. Cleaver Brooks Boiler WT400X-CN6

Minor Modification by adding Eight (8) each, 0.8 MMBtu/hr. Heaters – Zone gas fired convection Tenter Drying Ovens – July 3, 2006

Permitting Activities since Renewal Permit Issuance (Permit 559975)

Administrative permit amendment #4, corrects the emission rates for Nitrogen Oxides (NO_x) and Carbon Monoxide (CO) as listed in error for boiler emission source 37-0001-12 on page 28, Conditions E10-6 to be corrected as 4.2 pounds per hour and E10-7 to be corrected as 2.47 pounds per hour.

Administrative permit amendment No. 5, Responsible Official Change Letter dated November 17, 2011

Administrative permit amendment No. 6, Responsible Official Change Letter dated December 6, 2012

Administrative permit amendment No. 7, Responsible Official Change Letter dated January 10, 2015

Administrative permit amendment No. 8, Responsible Official Change Letter dated July 10, 2015

Administrative permit amendment No. 9, Responsible Official Change Letter dated January 7, 2016

Coater #10 (Source 10) removed from service

Boilers (Source 02 and Source 12) become subject to 40 CFR 63, Subpart DDDDD: NESHP For Major Sources: Industrial, Commercial, And Institutional Boilers and Process Heaters

Permitting Activities since Renewal Permit Issuance (Permit 580610)

Conditions A1 through E2 updated to include new standard language. Updated Responsible Official, Principal Technical Contact, and Billing contact for the facility to Eric Cook, President, per letter dated August 8, 2022. Added Condition E3-5 Insignificant Activities. Added Condition E4-2(c) VOC and HAP, Waste Solvent Shipped Off Site. Added Condition E12-13 for fuel logs as required by 40 CFR 63 Subpart DDDDD. Updated AP-42 emissions factors for 37-0001-02, 37-0001-10, and 37-0001-12 fuel logs. Updated Attachment 4 with as supplied VOC and HAP solvent content. Added Attachment 5 Insignificant Emission Units. Added Attachment 6 Source 02 and 12 SO₂ Agreement Letter. Added Attachment 7 APC 36 form for emission fee election schedule. Fixed minor grammatical issues and formatting.

B. Facility Classification

1. Attainment or Non-Attainment Area Location

Area is designated as an attainment area for all criteria pollutants.

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

C. Regulatory Status

1. PSD/NSR

This facility is considered a major source for PSD purposes.

2. Title V Major Source Status by Pollutant

Pollutant	Is the pollutant emitted?	If emitted, what is the facility's status?	
		Major Source Status	Non-Major Source Status
PM	Yes	X	
PM ₁₀	Yes	X	
SO ₂	Yes	X	
VOC	Yes	X	
NO _x	Yes		X
CO	Yes		X
CO _{2e}	Yes		X
Individual HAP	Yes		X
Total HAPs	Yes	X	

3. MACT Standards

This facility *is* a major source for HAPs. This facility *is subject* to a proposed or final MACT Standard.

List MACT Rule(s) if applicable:

40 CFR 63: Subpart JJJJ

NESHAP: Paper and Other Web Coating

Hazardous Air Pollutant (HAP) emissions from the paper coating operations are subject to subparagraphs 40 CFR § 63.3330(b)(2) and § 63.3330(b)(3) of the Code of Federal Regulations.

The permittee shall comply with the specific limits of organic Hazardous Air Pollutant (HAP) emissions from the paper coating operations shall comply with the specific limits based on either weight of the coatings [0.04 kg organic HAP per kg of coating material applied] or weight of the coating solids [0.20 kg organic HAP per kg of coating solids applied], in accordance with subparagraphs 40 CFR §63.3320(b)(2) and 40 CFR §63.3320(b)(3) of the Code of Federal Regulations.

The permittee shall submit the following reports:

Semi-annual Compliance Report, in accordance with subparagraphs 40 CFR § 63.3400(c)(1)i. and § 63.3400(c)(1)ii. of Code of Federal Regulations.

Subsequent Semi-Annual Compliance Reports must follow the Reporting Period required in accordance with subparagraph 40 CFR § 63.3400(c)(1)iii. and the Report Submittal Date required in accordance with subparagraph § 63.3400(c)(1)iv. And § 63.3400(c)(1)v. of the Code of Federal Regulations.

40 CFR 63: Subpart OOOO**NESHAP: Printing, Coating, And Dyeing of Fabrics and Other Textiles: Printing, Coating, And Dyeing of Fabrics and Other Textiles**

The permittee shall comply with the specific limits based on either the Compliant Material Option, in accordance with subparagraph 40 CFR § 63.4291(a)(1) or the Emission Rate Without Add-on Control Option, in accordance with subparagraph § 63.4291(a)(2) of the Code of Federal Regulations. In either option, the HAP emissions to the atmosphere shall be limited to 0.12 kg of organic HAP per kg of solids applied, in accordance with Table 1 of 40 CFR Subpart OOOO.

40 CFR 63: Subpart DDDDD**NESHAP: Industrial, Commercial, And Institutional Boilers and Process Heaters**

The permittee must meet the applicable work standards in Table 3 in accordance with 40 CFR §63.7500, submit the required compliance reports outlined in 40 CFR §63.7550, and keep records pursuant to 40 CFR §63.7555 and §63.7560.

4. Program Applicability

Are the following programs applicable to the facility?

PSD *no*

NESHAP *yes*

NSPS *no*

II. Compliance Information**A. Compliance Status**

Is the facility currently in compliance with all applicable requirements? *Yes*

This facility is subject to TAPCR 1200-3-18-.14, and 1200-3-18-.15. VOC – Paper and Related Coating, and Fabric Coating. The facility has filed a RACT determination that has been accepted by the State (Board Order No. 98-098), and supersedes the Chapter 18 regulations. The RACT has been approved by the Federal EPA.

The only compliance issue concerns the plant wide allowable SO₂ emission limit of 2623.30 tons per year as specified in permit 580350. This is only a concern as the facility has agreed to a Fuel oil #4 SO₂ emission limit of 39.16 tons per calendar year for the purpose of PSD avoidance. Additionally, the facility has agreed to a Fuel oil #6 SO₂ emission limit of 39.0 tons per calendar year for the purpose of PSD avoidance. These emission limits were established pursuant to TAPCR 1200-03-17-.01(3) and the agreement letter dated May 23, 2023. These limitations were initially established in the agreement letters dated January 4, 2005 (Fuel Oil #4) and May 25, 2000 (Fuel Oil #6). SO₂ emissions from insignificant emission units are estimated to be 0.0003 tons per year.

Are there any applicable requirements that will become effective during the permit term? *no*

III. Other Requirements**A. Emissions Trading**

The facility is not involved in an emission trading program.

B. Acid Rain Requirements

This facility is not subject to any requirements in Title IV of the Clean Air Act.

C. Prevention of Accidental Releases

Not Applicable

IV. Public Participation Procedures

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

1. EPA
2. Virginia Department of Environmental Quality
3. Kentucky Department for Environmental Protection
4. North Carolina Department of Environment and Natural Resources

V. Dates of Public Comment and EPA review periods

EPA concurrent review requested	Yes
Public Notice publication date	January 12, 2024
Public Notice period completion date	February 11, 2024
Public Notice publication comments	TBD
EPA Notification date	January 12, 2024
EPA review period completion date	February 26, 2024
EPA review comments	TBD
Permit Issuance Date	TBD

VI. Summary of Allowable Emissions by Source Number

Source Number	PM	SO2	CO	VOC	NOx
37-0001-02	169.10	2,070.90			
37-0001-04	6.40				
37-0001-10	2.70	0.20			
37-0001-12	42.50	513.20	2.60	0.70	10.40
37-0001-16	16.80	39.00		15.00	
Total	237.50	2623.30	2.60	15.70	10.40