

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



DRAFT 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. 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: TBD, 2024

Permit Number: 580610

Date Expires: TBD, 2029

Issued To:
Holliston Holdings, LLC

Installation Address:
905 Holliston Mills Road
Church Hill

Installation Description: Book Cover Coating and Printing Facility

- 02** Steam Generating Boiler Installation, 39 MMBtu/hr Boiler
- 04** Wastepaper Trim System with Cyclone Control
- 10** Coating Operation with Drying Ovens
- 12** Steam Generating Boiler Installation, 29.41 MMBtu/hr Boiler
- 16** Eight (8) each, 0.8MM Btu/hr. Tenter Drying Ovens

Emission Source Reference No.: 37- 0001

Renewal Application Due Date:

Between TBD, 2028 and TBD, 2028

Primary SIC: 22

Information Relied Upon:

Application dated October 6, 2014
Title V renewal application dated November 22, 2021, and received July 26, 2022
Responsible Official, Principle Technical Contact and Billing Contact letters dated August 8, 2022
Agreement letter dated May 23, 2023

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

CONTENTS

SECTION A

GENERAL PERMIT CONDITIONS

A1.	Definitions	1
A2.	Compliance requirement	1
A3.	Need to halt or reduce activity	1
A4.	The permit	1
A5.	Property rights	1
A6.	Submittal of requested information	1
A7.	Severability clause	2
A8.	Fee payment	2
A9.	Permit revision not required	2
A10.	Inspection and entry	2
A11.	Permit shield	3
A12.	Permit renewal and expiration	3
A13.	Reopening for cause	3
A14.	Permit transference	4
A15.	Air pollution alert	4
A16.	Construction permit required	4
A17.	Notification of changes	5
A18.	Schedule of compliance	5
A19.	Title VI	5
A20.	112 (r)	5

SECTION B

GENERAL CONDITIONS for MONITORING, REPORTING and ENFORCEMENT

B1.	Recordkeeping	6
B2.	Retention of monitoring data	6
B3.	Reporting	6
B4.	Certification	6
B5.	Annual compliance certification	6
B6.	Submission of compliance certification	7
B7.	Reserved	7
B8.	Excess emissions reporting	7
B9.	Malfunctions, startups and shutdowns - reasonable measures required	7
B10.	Reserved	8
B11.	Report required upon the issuance of notice of violation	8

CONTENTS

SECTION C

PERMIT CHANGES

C1.	Operational flexibility changes	9
C2.	Section 502(b) (10) changes	9
C3.	Administrative amendment	9
C4.	Minor permit modifications	9
C5.	Significant permit modifications	10
C6.	New construction or modifications	10

SECTION D

GENERAL APPLICABLE REQUIREMENTS

D1.	Visible emissions	11
D2.	General provisions and applicability for non-process gaseous emissions	11
D3.	Non-process emission standards	11
D4.	General provisions and applicability for process gaseous	11
D5.	Particulate emissions from process emission sources	11
D6.	Sulfur dioxide emission standards	11
D7.	Fugitive dust	11
D8.	Open burning	12
D9.	Asbestos	12
D10.	Annual certification of compliance	12
D11.	Emission Standards for Hazardous Air Pollutants	12
D12.	Standards of Performance for New Stationary Sources	12
D13.	Gasoline Dispensing Facilities	12
D14.	Internal Combustion Engines	12
D15.	Maintenance	12

CONTENTS

SECTION E

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

E1.	Fee payment: actual emissions basis	13
E2.	Reporting requirements	15
	(a) Semiannual reports	15
	(b) Annual compliance certification	16
	(c) NESHAP Reporting Requirements	17
	(d) Retention of Records	17
E3.	General Requirements	17
E4.	Facility-Wide Actual VOC/HAP Emission Calculation for Fee Determination	19
E5	Steam Generating Boiler Installation– 39 MMBtu/hr	21
E6.	Paper Trim Operation	23
E7.	Coating Operation	23
E8.	Coating Operation - 40 CFR 63, Subpart JJJJ requirements	26
E9.	Coating Operation - 40 CFR 63, Subpart OOOO requirements	27
E10.	Steam Generating Boiler Installation – 29.41 MMBtu/hr	30
E11.	Tenter Drying Ovens	33
E-12.	40 CFR 63, Subpart DDDDD requirements	34

END OF DRAFT PERMIT NUMBER 580610	36
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ATTACHMENT 1	Decision Tree for Opacity for Sources Utilizing EPA Method 9	1 page
ATTACHMENT 2	Table 1.4-1 and 1.4-2 Emission Factors for Nitrogen Oxides (NO _x), Carbon Monoxide (CO), and Greenhouse Gases from Natural Gas Combustion.....	2 pages
ATTACHMENT 3	Table 1.3-1. 1.3-2 Criteria Pollutant Emission Factors for Fuel Oil Combustion, Condensable Particulate Matter, and Total Organic Compounds.....	3 pages
ATTACHMENT 4	Facility VOC and HAP Emissions Estimation Procedure	1 page
ATTACHMENT 5	Insignificant Emission Units.....	1 page
ATTACHMENT 6	Source 02 and 12 SO ₂ Agreement Letter	2 pages
ATTACHMENT 7	Form APC 36.....	2 pages

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 emission fee based upon the responsible official's choice of actual emissions, allowable emissions, or a combination of actual and allowable emissions; and on the responsible official's choice of annual accounting period. An emission cap of 4,000 tons per year per regulated pollutant per major source SIC Code shall apply to actual or allowable based emission fees. A Title V annual emission fee will not be charged for emissions in excess of the cap. Title V annual emission fees will not be charged for carbon monoxide or for greenhouse gas pollutants solely because they are greenhouse gases.

(b) Title V sources shall pay allowable based emission fees until the beginning of the next annual accounting period following receipt of their initial Title V operating permit. At that time, the permittee shall begin paying their Title V fee based upon their choice of actual or allowable based fees, or mixed actual and allowable based fees. Once permitted, the Responsible Official may revise their existing fee choice by submitting a written request to the Division no later than December 31 of the annual accounting period for which the fee is due.

(c) When paying annual Title V emission fees, the permittee shall comply with all provisions of 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. Sources that are subject to federally promulgated hazardous air pollutant standards that can be imposed under TAPCR Chapter 0400-30-38 or Chapter 1200-03-31 will place such regulated emissions in the regulated hazardous air pollutant (HAP) category.
2. A category of miscellaneous HAPs shall be used for hazardous air pollutants listed at TAPCR part 1200-03-26-.02(2)(i)12 that are not subject to federally promulgated hazardous air pollutant standards under 40 CFR 60, 61, or 63 or TAPCR chapter 1200-03-31.
3. HAPs that are also in the family of volatile organic compounds, particulate matter, or PM₁₀ shall not be placed in either the regulated HAP category or miscellaneous HAP category.
4. Sources that are subject to a provision of TAPCR chapter 1200-03-16 New Source Performance Standards (NSPS) or chapter 0400-30-39 Standards of Performance for New Stationary Sources for pollutants that are neither particulate matter, PM₁₀, sulfur dioxide (SO₂), volatile organic compounds (VOC), nitrogen oxides (NO_x), or hazardous air pollutants (HAPs) will place such regulated emissions in an NSPS pollutant category.
5. The regulated HAP category, the miscellaneous HAP category, and the NSPS pollutant category are each subject to the 4,000 ton cap provisions of TAPCR subparagraph 1200-03-26-.02(2)(i).
6. Major sources that wish to pay annual emission fees for PM₁₀ on an allowable emission basis may do so if they have a specific PM₁₀ allowable emission standard. If a major source has a total particulate emission standard, but wishes to pay annual emission fees on an actual PM₁₀ emission basis, it may do so if the PM₁₀ actual emission levels are proven to the satisfaction of the Technical Secretary. The method to demonstrate the actual PM₁₀ emission levels must be made as part of the source's major source operating permit in advance in order to exercise this option. The PM₁₀ emissions reported under these options shall not be subject to fees under the family of particulate emissions. The 4,000 ton cap provisions of TAPCR subparagraph 1200-03-26-.02(2)(i) shall also apply to PM₁₀ emissions.

TAPCR 1200-03-26-.02 and 1200-03-09-.02(11)(e)1(vii)

- A9. Permit revision not required.** A permit revision will not be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or process for changes that are provided for in the permit.

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

- A10. Inspection and entry.** Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Technical Secretary or an authorized representative to perform the following for the purposes of determining compliance with the permit applicable requirements:

- (a) Enter upon, at reasonable times, the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of the -permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

- (c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (d) As authorized by the Clean Air Act and Chapter 1200-03-10 of 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, the Administrator 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/she agrees or disagrees with the Administrator's findings. If the Technical Secretary 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), the Technical Secretary shall bring the matter to the Board at its next regularly scheduled meeting for instructions as to how the Division 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. **Maintenance.** 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

37-0001	Facility Description:	Manufacturer of specialty coated and decorated substrates, principally book covers.
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Conditions E1 through E4 apply to all sources in Section E of this permit unless otherwise noted.

E1. Fee payment

FEE EMISSIONS SUMMARY TABLE FOR MAJOR SOURCE 37-0001

REGULATED POLLUTANTS	ALLOWABLE EMISSIONS (tons per AAP)	ACTUAL EMISSIONS (tons per AAP)	COMMENTS
PARTICULATE MATTER (PM)	237.50	AEAR	Includes all fee emissions.
PM ₁₀	N/A	N/A	
SO ₂	2623.30	AEAR	Includes all fee emissions.
VOC	15.70	AEAR	Includes all fee emissions.
NO _x	10.40	N/A	
CATEGORY OF MISCELLANEOUS HAZARDOUS AIR POLLUTANTS (HAPs WITHOUT A STANDARD) *			
VOC FAMILY GROUP	N/A	N/A	
NON-VOC GASEOUS GROUP	N/A	N/A	
PM FAMILY GROUP	N/A	N/A	
CATEGORY OF SPECIFIC HAZARDOUS AIR POLLUTANTS (HAPs WITH A STANDARD) **			
VOC FAMILY GROUP	N/A	N/A	NESHAP (40 CFR Part 63 Subpart JJJJ and IIII). Fee emissions are included in VOC above.
NON-VOC GASEOUS GROUP	N/A	N/A	
PM FAMILY GROUP	N/A	N/A	
CATEGORY OF NSPS POLLUTANTS NOT LISTED ABOVE***			
EACH NSPS POLLUTANT NOT LISTED ABOVE	N/A	N/A	

NOTES

AAP The Annual Accounting Period (AAP) is a 12 consecutive month period that either (a) begins each July 1st and ends June 30th of the following year when fees are paid on a fiscal year basis, or (b) begins January 1st and ends December 31st of the same year when paying on a calendar year basis. The Annual Accounting Period at the time of permit renewal issuance began July 1, 2023 and ends June 30, 2024. The next Annual Accounting Period begins July 1, 2024 and ends June 30, 2025, 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 (Attachment 7) to this permit and available on the Division of Air Pollution Control’s website.

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

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

- (1) **each regulated pollutant** (Particulate matter, SO₂, VOC, NO_x and so forth. See TAPCR 1200-03-26-.02(2)(i) for the definition of a regulated pollutant.),
- (2) **each pollutant group** (VOC Family, Non-VOC Gaseous, and Particulate Family),
- (3) the **Miscellaneous HAP Category**,
- (4) the **Specific HAP Category**, and
- (5) the **NSPS Category**

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

* **Category Of Miscellaneous HAP (HAP Without a Standard):** This category is made-up of hazardous air pollutants that do not have a federal or state standard. Each HAP is classified into one of three groups, the **VOC Family** group, the **Non-VOC Gaseous** group, or the **Particulate (PM) Family** group. **For fee computation**, the **Miscellaneous HAP Category** is subject to the 4,000-ton cap provisions of subparagraph 1200-03-26-.02(2)(i) of the TAPCR.

** **Category Of Specific HAP (HAP With a Standard):** This category is made-up of hazardous air pollutants (HAP) that are subject to Federally promulgated Hazardous Air Pollutant Standards that can be imposed under Chapter 1200-03-11 or Chapter 1200-03-31. Each individual hazardous air pollutant is classified into one of three groups, the **VOC Family** group, the **Non-VOC Gaseous** group, or the **Particulate (PM) Family** group. **For fee computation**, each individual hazardous air pollutant of the **Specific HAP Category** is subject to the 4,000-ton cap provisions of subparagraph 1200-03-26-.02(2)(i) of the TAPCR.

*** **Category Of NSPS Pollutants Not Listed Above:** This category is made-up of each New Source Performance Standard (NSPS) pollutant whose emissions are not included in the **PM, SO₂, VOC** or **NO_x** emissions from each source in this permit. **For fee computation**, each **NSPS pollutant not listed above** is subject to the 4,000-ton cap provisions of subparagraph 1200-03-26-.02(2)(i) of the TAPCR.

END NOTES

- The permittee shall:**
- (1) Pay Title V **annual emission fees**, on the emissions and year bases requested by the responsible official and approved by the Technical Secretary, for each annual accounting period (AAP) by the payment deadline(s) established in TAPCR 1200-03-26-.02(9)(g). Fees may be paid on an **actual, allowable, or mixed** emissions basis; and on either a **state fiscal year** or a **calendar year**, provided the requirements of TAPCR 1200-03-26-.02(9)(b) are met. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within 15 days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8).
 - (2) Sources paying annual emissions fees on an allowable emissions basis: pay annual allowable based emission fees for each annual accounting period no later than April 1 of each year pursuant to TAPCR 1200-03-26-.02(9)(d).
 - (3) Sources paying annual emissions fees on an actual emissions basis: prepare an **actual emissions analysis** for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:
 - (a) the completed **Fee Emissions Summary Table**,
 - (b) each **actual emissions analysis** required, and
 - (c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary's representative. The summary must include sufficient information for the Technical Secretary to determine the accuracy of the calculations. These calculations must be based on the annual fee basis approved by the Technical Secretary (a state

fiscal year [July 1 through June 30] or a calendar year [January 1 through December 31]). These records shall be used to complete the **actual emissions analyses** required by the above **Fee Emissions Summary Table**.

- (4) Sources paying annual emissions fees on a mixed emissions basis: for all pollutants and all sources for which the permittee has chosen an actual emissions basis, prepare an **actual emissions analysis** for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:
 - (a) the completed **Fee Emissions Summary Table**,
 - (b) each **actual emissions analysis** required, and
 - (c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary’s representative. The summary must include sufficient information for the Technical Secretary to determine the accuracy of the calculations. These calculations must be based on the fee bases approved by the Technical Secretary (payment on an actual or mixed emissions basis) and payment on a state fiscal year (July 1 through June 30) or a calendar year (January 1 through December 31). These records shall be used to complete the **actual emissions analysis**.

For all pollutants and all sources for which the permittee has chosen an allowable emissions basis, pay allowable based emission fees pursuant to TAPCR 1200-03-26-.02(9)(d).

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

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

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

Payment of Fee to:
 The Tennessee Department of Environment and Conservation
 Division of Fiscal Services
 Consolidated Fee Section – APC
 William R. Snodgrass Tennessee Tower
 312 Rosa L. Parks Avenue, 10th Floor
 Nashville, Tennessee 37243

Actual Emissions Analyses to:
 The Tennessee Department of Environment and Conservation
 Division of Air Pollution Control
 Emission Inventory Program
 William R. Snodgrass Tennessee Tower
 312 Rosa L. Parks Avenue, 15th Floor
 Nashville, Tennessee 37243
 or
 An electronic copy (PDF) of actual emissions analysis can also be submitted to: apc.inventory@tn.gov

E2. Reporting requirements.

- (a) **Semiannual reports.** Semiannual reports shall cover the six-month periods from **January 1** to **June 30** and **July 1** to **December 31** and shall be submitted within 60 days after the end of each six-month period. Subsequent reports shall be submitted within 60 days after the end of each 6-month period following the first report. 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
Old permit #568009	January 1, 2024	day before new permit issuance (with year)
New permit #580610	Issuance Date of new permit (with year)	December 1, 2024

These semiannual reports shall include:

- (1) Any monitoring and recordkeeping required by conditions **E6-2, E7-1, and E7-2** of this permit. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
- (2) The visible emission evaluation readings from condition **E3-1 and E10-9** 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 **July 1** to **June 30** 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
Old permit #568009	July 1, 2023	day before new permit issuance (with year)
New Permit #580610	Issuance Date of new permit (with year)	June 30, 2024

These certifications shall be submitted to:

TN APCD and **EPA**

Johnson City Environmental Field Office
Division of Air Pollution Control
2305 Silverdale Road
Johnson City, TN 37601
 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/)

40 CFR Part 70.6(c)(5)(iii) as amended in the Federal Register Vol. 79, No.144, July 28, 2014, pages 43661 through 43667
 TAPCR 1200-03-09-.02(11)(e)3.(v)

(c) **NESHAP Reporting Requirements**

Semiannual reports required by 40 CFR Part 63, Subpart JJJJ, 40 CFR §63.3400 and 40 CFR 63 Subpart OOOO, 40 CFR §63.4311, shall cover the period from **January 1 through June 30** and **July 1 to December 31** and shall be submitted within 60 days after the 6-month reporting period.

The permittee must submit annual, biennial, and/or 5-year reports required by 40 CFR 63, Subpart DDDDD, 40 CFR §63.7550 as applicable. If reporting annually, the compliance report must cover the period beginning January 1, 2024 to December 31, 2024; if reporting biennially, January 1, 2024 to December 31, 2025; and if reporting every 5-years, January 1, 2023 to December 31, 2027. The reports must be postmarked or delivered no later than 60 days after the reporting period ends.

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 as indicated below:

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

or via e-mail [Adobe Portable Document Format \(PDF\)
 Air.pollution.control@tn.gov](mailto:Air.pollution.control@tn.gov)

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

Note that each NESHAP Report, Title V Semiannual Report (SAR) and each Title V Annual Compliance Certification (ACC) must be submitted under separate cover and each report must be accompanied by a separate compliance certification statement.

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

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

E3. General requirements applicable to permitted facility.

- E3-1.** Visible emissions from the source shall not exhibit greater than twenty percent (20%) opacity, except for one (1) six-minute period in any one (1) hour period, and for no more than four (4) six-minute periods in any twenty-four (24) hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average). TAPCR 1200-03-05-.03(6) and TAPCR 1200-03-05-.01(1).

Compliance Method: The permittee shall assure compliance with the opacity standard by utilizing the opacity matrix dated June 18, 1996; amended September 11, 2013, that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

- E3-2.** For sources required to maintain daily logs, all data, including all required calculations, must be entered in the log no later than 7 days from the end of the day for which the data is required. For sources required to maintain monthly logs, all data, including all required calculations, must be entered in the log no later than 30 days from the end of the month for which the data is required.

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

- E3-3.** The permittee shall maintain and repair the emission source, associated air pollution control device(s), and compliance assurance monitoring equipment as required to maintain and assure compliance with the specified emission limits.

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

Compliance Method: Records of all repair and maintenance activities required above shall be recorded in a suitable permanent form and kept available for inspection by the Division. These records must be retained for a period of not less than five years. The date each maintenance and repair activity began shall be entered in the log no later than seven days following the start of the repair or maintenance activity, and the completion date shall be entered in the log no later than seven days after activity completion.

- E3-4.** Identification of Responsible Official, Technical Contact, and Billing Contact

a) The application that was utilized in the preparation of this permit is dated November 22, 2021, and was signed by the former Responsible Official Sheldon Sillyman of the permitted facility. The letter dated August 8, 2022, lists Eric Cook, President, as the new Responsible Official for 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 (30) days of the change. The notification shall include the name and title of the new Responsible Official and certification of truth and accuracy. All representations, agreement to terms and conditions, and covenants made by the former Responsible Official that were used in the establishment of the permit terms and conditions will continue to be binding on the facility until such time that a revision to this permit is obtained that would change said representations, agreements, and/or covenants.

b) The application that was utilized in the preparation of this permit is dated November 22, 2021, and identified Mike Amyx as the Principal Technical Contact for the permitted facility. The letter dated August 8, 2022, lists Eric Cook, President, as the new 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 (30) days of the change. The notification shall include the name and title of the new Principal Technical Contact and certification of truth and accuracy.

c) The application that was utilized in the preparation of this permit is dated November 22, 2021, and identified Sheldon Sillyman as the Billing Contact for the permitted facility. The letter dated August 8, 2022, lists Eric Cook, President, as the new 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 (30) days of the change. The notification shall include the name and title of the new Billing Contact and certification of truth and accuracy.

TAPCR 1200-03-09

- E3-5. Insignificant Activities**

Insignificant activities as stated by the permittee in the Title V Application per Rule 1200-03-09-.04(5) are listed in Attachment 5. Additional insignificant activities may be added and operated at any time with the provision that a written notification shall be submitted to the Technical Secretary including an updated APC 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.

E4. Facility-Wide Actual VOC/HAP Emission Calculation for Fee Determination

E4-1. For purposes of determination of actual VOC/HAP emissions from this facility, the emissions shall be determined annually based on net solvent consumption. This condition is for fee purposes only and covers fiscal years July through June of each year and should be included with each annual fee submittal.

TAPCR 1200-03-26-.02(9)(g)3.

Compliance Method: Compliance with this condition shall be satisfied by recordkeeping as proposed in Attachment 4 to Holliston Holdings, LLC’s letter: “Facility VOC and HAP Emissions Estimate Procedure”, dated November 23, 2021.

FISCAL YEAR VOC/HAP EMISSION LOG FOR NET SOLVENT CONSUMPTION (FACILITY 37-0001)

VOC Emissions (tons per fiscal year)	HAP 1 Emissions (tons HAP 1 per fiscal year)	HAP 2 Emissions (tons HAP 2 per fiscal year)	HAP 3 Emissions (tons HAP 3 per fiscal year)	HAP 4 Emissions (tons HAP 4 per fiscal year)	Total HAP Emissions (tons Total HAPs per fiscal year)

E4-2. VOC/HAP/SOLIDS content log

Determinations of the as-supplied volatile organic compounds (VOC), hazardous air pollutants (HAP) including volatile hazardous air pollutants (VHAP), containing materials used in this facility shall be completed once within 90 days from the date of issuance of this permit as follows:

(a) **VOC Content of All Coatings, Inks, Adhesives, Thinners, Cleaners, Solvents and Ancillary Materials** – to be determined by using EPA Method 24 analyses to determine volatile matter content, water content, density, volume solids and weight solids. Data may be obtained by laboratory analysis, from manufacturer or vendor certification that the data was determined by EPA Method 24, or from formulation data provided by the manufacturer. Should the permittee need to modify the solvent VOC formulation as shown in **Attachment 4**, a Title V modification shall first be applied for and received in accordance with TAPCR 1200-03-09-.02(11)(d)1(i)(V) prior to making the change.

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.

(b) **HAP Content of All Coatings Inks, Adhesives, Thinners, Cleaners, Solvents and Ancillary Materials** – to be determined by using EPA Method 311 to determine the organic HAP weight fraction. Data may be obtained by laboratory analysis or from Certified Product Data Sheets (CPDS) provided by the manufacturer.

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 source 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. Should the permittee need to modify the solvent HAP formulation as shown in **Attachment 4**, a Title V modification shall first be applied for and received in accordance with TAPCR 1200-03-09-.02(11)(d)1(i)(V) prior to making the change.

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)

MATERIALS VOC/HAP CONTENT LOG FOR FACILITY 37-0001

MATERIAL NAME	MATERIAL DENSITY (pounds per gallon)	VOC CONTENT (percent by weight)	VOC CONTENT (percent by volume of volatile content)	HAP 1 CONTENT (percent by weight)	HAP 2 CONTENT (percent by weight)	TOTAL HAP CONTENT (percent by weight)
Material 1						
Material 2						
Material .						

(c) **VOC and HAP, Waste Solvent Shipped Off Site** - All waste sludge containing VOCs and HAPs that is collected in drums and shipped offsite to a permitted treatment, storage, disposal, or recycling (TSDR) facility can be used as credit toward the facility’s VOC and HAP emissions with the approval of the Technical Secretary. Before credit can be given, conditions (i), (ii), and (iii) must be met if electing to sample. In lieu of sampling condition (iv) must be met if calculating:

(i) In order to claim credit for offsite disposal of VOC and HAP containing waste in any calendar month, the permittee must sample at least one shipment of VOC and HAP containing waste during that month. The permittee shall not claim credit for offsite disposal of waste containing VOC and HAP during any calendar month in which samples were not collected.

(ii) If sampling is elected to claim credit for offsite disposal of VOC and/or HAP containing waste the permittee must collect samples from at least ten percent (10%) of all drums with VOC and/or HAP containing waste in a shipment, using the most current version of American Society for Testing and Materials (ASTM) Method D5495 (Standard Practice for Sampling with a Composite Liquid Waste Sampler). The samples may be combined into one composite sample for testing. The VOC and HAP content of that sample shall be applied to all shipments of VOC and HAP containing waste during that calendar month. Records shall be maintained of the VOC and HAP content of each analyzed sample, the amount of waste sludge shipped off-site each month, and the calculated amounts of HAPs and VOCs shipped off-site each month based on the sample analysis and the amount of waste sludge shipped off-site.

(iii) Upon notification by the Technical Secretary or an authorized representative, the permittee shall inform the Technical Secretary or an authorized representative of the next sample collection date at least seven days prior to the event. The Technical Secretary or an authorized representative(s) shall have the option to attend the sample collection and to select the drums to be sampled.

(iv) In order to claim credit for offsite disposal of VOC and HAP containing waste in any calendar month, the permittee must calculate the amount of individual solvents as shown in **Attachment 4** of VOC and HAP containing waste during that month. The permittee shall not claim credit for offsite disposal of waste containing VOC and HAP during any calendar month in which calculations were not performed. Should the permittee need to modify the waste credit calculations as shown in **Attachment 4**, a Title V modification shall first be applied for and received in accordance with 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 all required documentation or calculations in order to receive credit for shipping solvents off site.

37-0001-02	Source Identification:	Steam Generating Boiler Installation consisting of one (1) 39 MMBtu/hr Springfield Boiler. Boiler primarily operates on natural gas with No.2, No.4, and No.6 fuel oil as back-up. The boiler is designated as a <i>Unit designed to burn gas 1 fuels</i> and is subject to the requirements of 40 CFR 63: Subpart DDDDD as outlined in Section E12.
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E5. Conditions E5-1 thru E5-5 - apply to source 37-0001-02.

E5-1. The stated design heat input is 39 MMBtu /hr for the Springfield Boiler Serial #631. Should the permittee need to modify the 39 MMBtu/hr boiler in a manner that increases the stated design heat input rate, a Title V modification shall first be applied for and received in accordance with TAPCR 1200-03-09-.02(11)(d)1(i)(V) prior to making the change.

TAPCR 1200-03-09-.03(8) and the applications dated October 6, 2014, and November 22, 2021.

Compliance Method: The permittee shall maintain documentation to demonstrate the heat input rate for the 39 MMBtu/hr 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. Should the permittee need to modify the 39 MMBtu/hr boiler to allow the use of a fuel other than natural gas, No. 2 fuel oil, No. 4 fuel oil, or No. 6 fuel oil, a Title V modification shall first be applied for and received in accordance with TAPCR 1200-03-09-.02(11)(d)1(i)(V) prior to making the change.

TAPCR 1200-03-09-.03(8) and the applications dated October 6, 2014, and November 22, 2021.

Compliance Method: The permittee shall maintain documentation to demonstrate the type(s) of fuel used by the 39 MMBtu/hr 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. Compliance with this condition is also assured by complying with Condition E12-3. The boiler is designated as a *Unit designed to burn gas 1 fuels*.

E5-3. Particulate matter emitted from this source shall not exceed 38.6 pounds per hour maximum.

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

Compliance Method: Compliance with this condition shall be assured through compliance with Condition E5-2 and EPA AP -42 emission factors for combustion of natural gas, No. 2, No. 4, and No. 6 fuel oils. These emission factors are listed in the tables below. The permittee shall submit compliance certification for particulate matter from this source annually.

For fee purposes, recordkeeping of fuel usage shall be conducted using the following logs, combined with 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 (Attachment #2) and Criteria Pollutant Emission Factors for Fuel Oil Combustion – Table 1.3-1-2, Emission Factors for Total Organic Compounds (TOC), Methane, and Nonmethane TOC (NMTOC) From Uncontrolled Fuel Oil Combustion, Table 1.3-3, 5th Ed., 5/10. (Attachment #3).

MONTHLY EMISSIONS LOG FROM #2 FUEL COMBUSTION FOR SOURCE 37-0001-02

BOILER # _____		MONTH: _____		#2 Fuel Oil Usage (10 ³ gal/month): _____	
Pollutant	AP-42 Emission Factor (lb/10 ³ gal)	Emission Rate (tons/month)			
PM (TSP)	2				
SO ₂	142S *				

NO _x	20	
VOC (Excluding Methane)	0.2	

MONTHLY EMISSIONS LOG FROM #4 FUEL COMBUSTION FOR SOURCE 37-0001-02

BOILER # _____ MONTH: _____ #4 Fuel Oil Usage (10³ gal/month): _____

Pollutant	AP-42 Emission Factor (lb/10 ³ gal)	Emission Rate (tons/month)
PM (TSP)	7	
SO ₂	150S *	
NO _x	20	
VOC (Excluding Methane)	0.2	

MONTHLY EMISSIONS LOG FROM #6 FUEL COMBUSTION FOR SOURCE 37-0001-02

BOILER # _____ MONTH: _____ #6 Fuel Oil Usage (10³ gal/month): _____

Pollutant	AP-42 Emission Factor (lb/10 ³ gal)	Emission Rate (tons/month)
PM (TSP)	9.19(S)+3.22	
SO ₂	157S *	
NO _x	55	
VOC (Excluding Methane)	0.28	

* S indicates the weight % of sulfur in the oil

MONTHLY EMISSIONS LOG FROM NATURAL GAS COMBUSTION FOR SOURCE 37-0001-02

MONTH: _____ Natural Gas Usage (10⁶ scf/month): _____

Pollutant	AP-42 Emission Factor (lb/10 ⁶ scf)	Emission Rate (tons/month)
PM (TSP)	7.6	
SO ₂	0.6	
NO _x	100	
VOC (Excluding Methane)	5.5	

FISCAL YEAR COMBUSTION EMISSIONS LOG FOR SOURCE 37-0001-02

YEAR: _____

MONTH	PM EMISSIONS (tons)	SO ₂ EMISSIONS (tons)	NO _x EMISSIONS (tons)	VOC EMISSIONS (tons)
TOTALS				

Fuel oil sulfur content shall be determined by fuel supplier certification and must be retained for a period of at least five (5) years. This certification shall include the following:

1. The name of the oil supplier;
2. Sulfur content of the fuel in percent by weight; or in the case of number 2 oil; a statement from the oil supplier that the oil complies with the specification for fuel oil number 2; as defined by the American Society of Testing and Materials in ASTM D396-78, "Standard Specification for Fuel Oil".

Monthly fuel oil usage shall be determined from purchase records and tank inventories. These logs and records shall be retained for a period of not less than five (5) years.

E5-4. Sulfur dioxide emitted from this source shall not exceed 4.0 pounds per million Btu heat input (472.8 pounds per hour maximum).

TAPCR 1200-03-14-.02(1)(a).

Compliance Method: A sulfur content of the oil combusted of 3.8% or less shall be deemed as complying with this condition. If fuel oil having a sulfur content of greater than 3.8% is combusted, daily records of fuel usage in each boiler and fuel oil sulfur content along with calculations using the AP-42 Criteria Pollutant Emission Factors for Fuel Oil Combustion –Table 1.3-1, 5th Ed., 5/10 (Attachment #3), shall be provided for demonstrating compliance with this condition. Fees shall be determined through recordkeeping of fuel usage and sulfur content using the logs specified in Condition E5-3 combined with 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 (Attachment #2).

E5-5. Sulfur dioxide emitted from the 39 MMBtu/hr Springfield Boiler shall not exceed 39 tons per calendar year from the use of No. 6 oil.

TAPCR 1200-03-14-.01(3) and information contained in the agreement letter dated May 23, 2023 (Attachment 6). This yearly limit was established to avoid PSD as a result of adding No.6 oil capability. This limitation will also keep other pollutants below PSD limits.

Compliance Method: Compliance with this emission limitation shall be certified through recordkeeping of fuel usage using the logs specified in Condition E5-3 combined with the use of AP-42 Criteria Pollutant Emission Factors for Fuel Oil Combustion – Table 1.3-1. (Attachment #3).

YEARLY SO₂ EMISSIONS LOG FOR SOURCE 37-0001-02 #6 OIL USAGE YEAR: _____

MONTH	SO ₂ EMISSIONS (tons)
TOTAL	

37-0001-04	Source Identification	Paper Trim Operation with cyclone control.
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E6. Conditions E6-1 thru E6-2 apply to source 37-0001-04.
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E6-1. Wastepaper input to the paper trim operation shall not exceed 300 pounds per hour. The Technical Secretary may require the permittee to prove compliance with this rate. TAPCR 1200-03-09-.01-(1)(d) and the application dated October 6, 2014.

E6-2. Particulate emissions from this source shall not exceed 0.02 grains per dry standard cubic foot (1.47 pounds per hour).

TAPCR 1200-03-7-.04(1)

Compliance Method: Compliance assurance with the emission limitation of this condition shall be through monthly inspections of the cyclone while the source is in operation. Maintenance and inspection records (inspection of collection hoppers, conveying system, etc) shall be compiled on a monthly basis denoting the maintenance/repair that was performed and the days the work was conducted. The monthly summary of maintenance log entries shall be included in the semi-annual reporting in accordance with Condition E2.
For fee purposes, unless otherwise documented, actual emissions are assumed to be equal to allowable emissions.

37-0001-10	Source Identification	Coating Operation consisting of Eight (8) Printers/Coaters with Dryers (Coaters Nos. 3, 4, 5, 6, 7, 8, 11, 15). Woven and Non-Woven materials are surface coated with water and/or solvent based coatings. The Coating Dryers are fired with natural gas.
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E7. Conditions E7-1 thru E7-4 apply to source 37-0001-10.
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E7-1. The Volatile Organic Compound (VOC) content of the paper and fabric coating shall not exceed 2.9 pounds per gallon, excluding water and/or exempt compounds, as applied, in accordance with subparagraphs 1200-03-18-.14(3)(a) and 1200-03-18-.15(3)(a) of

the Tennessee Air Pollution Control Regulations, except that the RACT determination approved by the Tennessee Air Pollution Control Board as order No. 98-098 dated June 10, 1998, included as Condition E7-2 shall supersede this condition.

Compliance Method: Compliance with this limitation shall be satisfied by meeting the requirements of Condition E7-2.

- E7-2.** The paper coating and fabric coating operations at Holliston Holdings, LLC facility shall satisfy the following requirements.
- a. Complying coatings shall be used to the maximum extent practical, including use of only complying coatings in coating paper products (LOG A). Also, only complying coatings shall be used on Coater #7.
 - b. Specifically for coating operations on Coaters #8 and #11, Holliston Holdings, LLC will satisfy, in addition to the employable standards and requirements listed in Requirements d. and e. below as RACT (refer to Board Order No. 98-098 dated June 10, 1998) for Holliston Holdings, LLC coating at Church Hill, the requirements are as follows:
 - 1) Continue ongoing conversion to complying coatings and water-based coatings and continue research and development of new coatings chemistry;
 - 2) Maintain records of coatings usage and records of calculations of VOC emissions to document progress in coatings conversions;
 - 3) Provide annual reports, consistent with schedule specified in Requirement f. below, of research and development in reducing VOC emissions; and
 - 4) Use coatings each of which has a VOC content not in excess of 8.6 pounds per gallon, excluding water and exempt compounds, as applied (LOG B).
 - c. During any month in which any coating other than a complying coating is used in Coater #3, #4, #5, #6, or #15, compliance with the VOC-content standard for Rule 1200-03-18-.14 or .15 shall be demonstrated for that coater for that month by the weighted average VOC content calculation; according to the method specified in Paragraph 1200-03-18-.82(1) of the TAPCR (LOG C).
 - d. Proper procedures for minimizing VOC emissions from the coating operations and associated VOC handling operations, such as by instructing personnel that containers which hold VOCs be covered at all times, other than when personnel are accessing the interiors of those containers, shall be established by Holliston Holdings, LLC and be stated in written Standard Operating Procedures (SOP's). These SOPs shall be updated continually, as procedures are updated to improve VOC emission minimization. The current SOPs shall be made available to the Technical Secretary or representative upon request.
 - e. Training of plant personnel in the proper procedures for minimizing VOC emissions shall be conducted as frequently as necessary to maintain personnel competence in VOC emission minimization. Records documenting such training shall be maintained and made available for review by the Technical Secretary or representative upon request. Each record of such training shall be maintained by Holliston Holdings, LLC for no less than three years following the training.
 - f. By March 31 of each year, a report shall be submitted to the Technical Secretary outlining the results of research and development in reducing VOC emissions from the coating operations (for example through reformulation of coatings and institution of process changes in the nature of pollution prevention measures) and of reductions achieved by implementation of new emission reduction methods.
 - g. The standards and requirements in this determination of reasonably available control technology shall not act as abrogation of any standards and requirements in the TAPCR or in conditions on permits issued by the Technical Secretary, except standards and requirements in or taken from Rules 1200-03-18-.14 and 0.15.

TAPCR 1200-03-18-.02(7), RACT Determination for VOC Emissions, State of Tennessee Air Pollution Control Board, Order No. 98-098.

Compliance Method: Compliance with these limitations shall be assured by recordkeeping using the logs below. The monthly weighted average VOC content of coatings applied in Coaters No. 3, 4, 5, 6, and 15, and the alternative daily weighted average VOC content of coatings applied in Coater #7, shall be determined according to the following formula and recorded in the log below.

$$VOC_w = \frac{\sum_{i=1}^n V_i C_i}{V_T}$$

where:

- VOC_w = The weighted average VOC content of the coatings and/or inks, as applied, used on a line or operation in units of kilograms of VOC per liter of coatings, and/or ink (kg VOC/L) (pounds of VOC per gallon of coating and/or ink [lb VOC/gal]), excluding water and/or exempt compounds;
- n = The number of different coatings and/or inks, as applied, during each averaging period on a line or operation;
- V_i = The volume of each coating or ink, as applied, during each averaging period on a line or operation in units of L (gal), excluding water and/or exempt compounds;
- C_i = The VOC content of each coating or ink, as applied, during each averaging period on a line or operation in units of kg VOC/L of coating or ink (lb VOC/gal), excluding water and/or exempt compounds; and
- V_T = The total volume of all coatings and/or ink, as applied, during each averaging period on a line or operation in units of L (gal), excluding water and/or exempt compounds.

(LOG A) MONTHLY VOC CONTENT LOG FOR COATER #7. (SOURCE 37-0001-10)

MONTH: _____

Material Name	Usage (gallons)	VOC Content As Applied Excluding Water and/or Exempt Solvents (lbs/gal)

(LOG B) MONTHLY VOC CONTENT LOG FOR COATERS #8 and #11. (SOURCE 37-0001-10)

MONTH: _____

Material Name	Usage (gallons)	VOC Content as Applied Excluding Water and/or Exempt Solvents (lbs/gal)

(LOG C) ALTERNATIVE MONTHLY WEIGHTED AVERAGE VOC CONTENT LOG FOR COATERS #3, #4, #5, #6 OR #15. (SOURCE 37-0001-10)

Date: _____

Material Name	Usage (gallons)	Percent Volume of Water and/or Exempt Solvent As Applied	Volume of Coating Applied Excluding Water and/or Exempt Solvents (V _i)	VOC Content As Applied Excluding Water and/or Exempt Solvents (lbs/gal) (C _i)	VOC Applied (lbs) (V _i x C _i)
TOTALS:					

Weighted average VOC content = _____

E7-3. Particulate matter (TSP) emitted from the Coating Dryers shall not exceed 0.61 pounds per hour.

TAPCR 1200-03-26-.02(9)(g)1

Compliance Method: This source’s potential to emit is less than five tons per year of particulate matter. By annual certification of compliance, the permittee shall meet the monitoring and related recordkeeping and reporting requirements of TAPCR 1200-03-9-.02(11)(e)1.(iii) and 1200-03-10-.04(2)(b)1; and compliance requirements of TAPCR 1200-03-9-.02(11)(e)3.(i). The permittee shall submit compliance certification for particulate matter from this source annually.
For fee purposes the combined maximum installed fuel firing capacity along with 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. (Attachment #2) are used to calculate emissions.

(LOG F) YEARLY NATURAL GAS EMISSIONS LOG (SOURCE 37-0001-10)

Estimated Natural Gas Usage (10⁶ scf/year) *: _____

Pollutant	AP-42 Emission Factor (lb/10 ⁶ ft ³ of Natural Gas)	Emission Rate (tons/year)
PM (TSP)	7.6	
SO ₂	0.6	
NO _x	100	
VOC (Excluding Methane)	5.5	

* Based on design capacity.

E7-4. Sulfur Dioxide (SO₂) emitted from the Coating Dryers shall not exceed 0.05 pounds per hour.

TAPCR 1200-03-14-.01(3)

Compliance Method: This source’s potential to emit is less than five tons per year of sulfur dioxide. By annual certification of compliance, the permittee shall meet the monitoring and related recordkeeping and reporting requirements of TAPCR 1200-03-09-.02(11)(e)1.(iii) and 1200-03-10-.04(2)(b)1; and compliance requirements of TAPCR 1200-03-09-.02(11)(e)3.(i). The permittee shall submit compliance certification for sulfur dioxide from this source annually.

37-0001-10	Source Identification	Coating Operation consisting of Eight (8) Printers/Coaters with Dryers (Coaters Nos. 3, 4, 5, 6, 7, 8, 11, and 15. Woven and Non-Woven materials are surface coated with water and/or solvent based coatings. The Coating Dryers are fired with natural gas. The MACT standard 40 CFR 63 Subpart JJJJ for the Paper Coating Operation shall apply
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E8. Conditions E8-1 thru E8-4 apply to source 37-0001-10.

E8-1. The provisions of 40 CFR 63 Subpart JJJJ apply to each new and existing facility that is a major source of HAP, as defined in 40 CFR §63.2, at which web coating lines are operated. 40 CFR §63.3290

The 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.

Compliance Method: The permittee shall track the total monthly organic HAP applied by following the procedures in 40 CFR §63.3370(d). The monthly HAP applied shall be less than the equivalent allowable organic HAP of 0.04 kg organic HAP per kg of coating material applied (weight of the coatings) or 0.20 kg organic HAP per kg of coating solids applied (weight of the coating solids).

E8-2. Semi-annual Compliance Reports must follow the Reporting Period required in accordance with subparagraph 40 CFR §63.3400(c)(1)iii.; the Report Submittal Date required in accordance with subparagraph 40 CFR §63.3400(c)(1)iv. and 40 CFR § 63.3400(c)(1)v. of the Code of Federal Regulations.

E8-3. The compliance report must contain the information in this condition as follows:

- (i) Company name and address.
 - (ii) Statement by a responsible official with that official's name, title, and signature certifying the accuracy of the content of the report.
 - (iii) Date of report and beginning and ending dates of the reporting period.
 - (iv) If there are no deviations from any emission limitations (emission limit or operating limit) that are applicable, submit a statement that there were no deviations from the emission limitations during the reporting period,
 - (v) For each deviation from an emission limitation (emission limit or operating limit) that is applicable, and that occurs at an affected source where a CEMS is not being used to comply with the emission limitations, the compliance report must contain the information in paragraphs (i) through (iii) of this condition.
 - (vi) Information on the number, duration, and cause of deviations (including unknown cause), if applicable, and the corrective action taken.
- 40 CFR §63.3400(c)

E8-4. The semiannual reports outlined in Conditions E8-2 and E8-3., shall be submitted to the address outlined in E2.(c).

40 CFR §63.3400(a)

37-0001-10	Source Identification	Coating Operation consisting of Eight (8) Printers/Coaters with Dryers (Coaters Nos. 3, 4, 5, 6, 7, 8, 11 and 15. Woven and Non-Woven materials are surface coated with water and/or solvent based coatings. The Coating Dryers are fired with natural gas. The MACT standard 40 CFR 63 Subpart OOOO for the Fabric Coating Operation shall apply.
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E9. Conditions E9-1 thru E9-8 apply to source 37-0001-10.

E9-1. The source category to which 40 CFR 63 Subpart OOOO applies is the printing, coating, slashing, dyeing, or finishing of fabric.
40 CFR §63.4281

The organic Hazardous Air Pollutant (HAP) emissions from the fabric coating operations 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 40 CFR§ 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 63 Subpart OOOO.

40 CFR Part §63.4291(a)(1), § 63.4291(a)(2).

E9-2. Pursuant to 40 CFR §63.4291, the permittee must include all regulated materials (as defined in 40 CFR §63.4371) used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in Table 1 to 40 CFR 63 Subpart OOOO. To make this determination, use at least one of the compliance options for the subcategory listed in the condition below.

(a) *Web coating and printing.* The permittee may apply any one of the compliance options in this condition to an individual web coating/printing operation, or to multiple web coating/printing operations in the affected source as a group, or to the entire affected source in the web coating and printing subcategory. Different compliance options may be used for different web coating/printing operations or at different times on the same web coating/printing operation. However, different compliance options may not be used at the same time on the same web coating/printing operation. If there is a switch between compliance options for any web coating/printing operation or group of operations, document this switch as required by 40 CFR §63.4312(c), and report it in the next semiannual compliance report required in 40 CFR §63.4311.

(a)(1) *Compliant material option.* Demonstrate that the organic HAP content, as purchased, of each coating and printing material applied in the web coating/printing operation(s) is less than or equal to the applicable emission limit in Table 1 to 40 CFR 63 Subpart OOOO, and that each thinning and cleaning material as purchased contains no organic HAP (as defined in 40

CFR§63.4371). The permittee must meet all the requirements of 40 CFR §63.4320, 40 CFR §63.4321, and 40 CFR §63.4322 to demonstrate compliance with the applicable emission limit using this option.

(a)(2) *Emission rate without add-on controls option.* Demonstrate that, based on the regulated materials applied in the web coating/printing operation(s), the organic HAP emission rate for the web coating/printing operation(s) is less than or equal to the applicable emission limit in Table 1 to 40 CFR 63 Subpart OOOO calculated as a rolling 12-month average emission rate. The permittee must meet all the requirements of 40 CFR §63.4330, 40 CFR §63.4331, and 40 CFR §63.4332 to demonstrate compliance with the applicable emission limit using this option.

Pursuant to 40 CFR §63.4293(a), for any web coating/printing operation(s) or dyeing/finishing operation(s) on which the compliant material option or the emission rate without add-on controls option is used, the permittee is not required to meet any work practice standards.

- E9-3.** Continuous compliance must be demonstrated for each subsequent Compliance Period [month], after Initial Compliance, based on either the Compliant Material option, in accordance with subparagraph 40 CFR§ 63.4322 (a), or the Emission Rate Without Add-on-Control option, in accordance with subparagraph 40 CFR§ 63.4332 (a) of the Code of Federal Regulations. 40 CFR Part §63.4322(a), 40 CFR §63.4332(a).
- E9-4.** Pursuant to 40 CFR §63.4311(a), the permittee must submit semiannual compliance reports for each affected source to the address outlined in Condition E2.(c). Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. Each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
- E9-5.** Pursuant to 40 CFR §63.4311(a)(2) *Inclusion with title V report.* Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 40 CFR part 71 must report all deviations as defined in 40 CFR 63 Subpart OOOO in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a semiannual compliance report pursuant to this condition along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the semiannual compliance report includes all required information concerning deviations from any emission limitation in 40 CFR 63 Subpart OOOO its submission shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.
- E9-6.** Pursuant to 40 CFR §63.4311 (a)(3) *General requirements.* The semiannual compliance report must contain the information specified in paragraphs (a)(3)(i) through (v) of this condition, and the information specified in paragraphs (a)(4) through (a)(6).
 (a)(3)(i) Company name and address.
 (a)(3)(ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
 (a)(3)(iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6- month period ending on June 30 or December 31.
 (a)(3)(iv) Identification of the compliance option or options specified in 40 CFR §63.4291 that were used on each web coating/printing and dyeing/finishing operation during the reporting period. If there was a switch between compliance options during the reporting period, the permittee must report the beginning and ending dates that each option was used.
 (a)(3)(v) Submit the calculation results for each compliance period ending each month during the 6-month reporting period.
- (a)(4) *No deviations.* If there were no deviations from the emission limitations in Table 1 to 40 CFR 63 Subpart OOOO and 40 CFR §63.4292, and 40 CFR §63.4293 that apply, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period.
- (a)(5) *Deviations: compliant material option.* If the compliant material option was used, and there was a deviation from the applicable organic HAP content requirements in Table 1 to 40 CFR 63 Subpart OOOO, the semiannual compliance report must contain the information in paragraphs (a)(5)(i) through (iv) of this condition.
 (a)(5)(i) Identification of each coating, printing, slashing, dyeing or finishing material applied that deviated from the emission limit and each thinning or cleaning material applied in web coating/printing operations that contained organic HAP, and the dates and time periods each was applied.

(a)(5)(ii) The calculation of the organic HAP content using Equation 1 of 40 CFR §63.4321 for each coating or printing material identified in paragraph (a)(5)(i). Background data supporting this calculation (*e.g.*, information provided by material suppliers or manufacturers, or test reports) does not need to be submitted.

(a)(5)(iii) The determination of mass fraction of organic HAP for each regulated material identified in paragraph (a)(5)(i) of this condition. Background data supporting this calculation (*e.g.*, information provided by material suppliers or manufacturers, or test reports) does not need to be submitted.

(a)(5)(iv) A statement of the cause of each deviation.

(a)(6) *Deviations: emission rate without add-on controls option.* If the emission rate without add-on controls option was used and there was a deviation from the applicable emission limit in Table 1 to 40 CFR 63 Subpart OOOO, the semiannual compliance report must contain the information in paragraphs (a)(6)(i) through (iii) of this condition.

(a)(6)(i) The beginning and ending dates of each compliance period during which the organic HAP emission rate exceeded the applicable emission limit in Table 1 to 40 CFR 63 Subpart OOOO.

(a)(6)(ii) The calculations used to determine the organic HAP emission rate for the compliance period in which the deviation occurred. Submit the calculations for Equation 1A in 40 CFR §63.4331 for web coating/printing operations; and for Equations 4, 4A, 5, and 6 in 40 CFR §63.4331 for dyeing/finishing operations; and if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR §63.4331(a)(4)(iii) or 40 CFR §63.4331(b)(3)(ii); and, for dyeing/finishing operations, if applicable, the mass of organic HAP in wastewater streams calculation for Equation 7 in 40 CFR §63.4331. The background data supporting these calculations (*e.g.*, information provided by materials suppliers or manufacturers, or test reports) does not need to be submitted.

(a)(6)(iii) A statement of the cause of each deviation.

E9-7. Pursuant to 40 CFR §63.4312, the permittee must collect and keep a record of the data and information specified in this condition. Failure to collect and keep these records is a deviation from the applicable standard.

a) A copy of each notification and report that was submitted to comply with 40 CFR 63 Subpart OOOO, and the documentation supporting each notification and report.

(b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data or test data used to determine the mass fraction of organic HAP for coating, printing, slashing, dyeing, finishing, thinning, and cleaning materials; and the mass fraction of solids for coating and printing materials. If testing was conducted to determine the mass fraction of an organic HAP of coating materials or the mass fraction of solids of coating materials, the permittee must keep a copy of the complete test report. If information provided by the manufacturer or supplier of the material was used that was based on testing, the permittee must keep the summary sheet of results provided by the manufacturer or supplier. Obtaining the test report or other supporting documentation from the manufacturer or supplier is not required.

(c) For each compliance period, the records specified in paragraph (c)(1)(i) and (c)(1)(ii) of this condition for web coating/printing operations shall be kept.

(c)(1) A record of the web coating/printing operations which were used on each compliance option and the time periods (beginning and ending dates) each option was used. For each month, a record of all required calculations for the compliance option(s) used, as specified in paragraphs (c)(1)(i) and (ii) of this condition.

(c)(1)(i) For the compliant material option, a record of the calculation of the organic HAP content, as purchased, for each coating and printing material applied, using Equation 1 of 40 CFR §63.4321.

(c)(1)(ii) For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coating, printing, thinning and cleaning materials applied each compliance period using Equation 1A of 40 CFR §63.4331 and, if applicable, the calculation used to determine the mass of organic HAP in waste materials according to 40 CFR §63.4331(a)(4)(iii); the calculation of the total mass of the solids contained in all coating and printing materials applied each compliance period using Equation 2 of 40 CFR §63.4331; and the calculation of the organic HAP emission rate for each compliance period using Equation 3 of 40 CFR §63.4331.

(d) A record of the name and mass of each regulated material applied in the web coating and printing subcategory and the dyeing and finishing subcategory during each compliance period. If using the compliant material option for all regulated materials at the source, the permittee may maintain purchase records for each material used rather than a record of the mass used.

(e) A record of the mass fraction of organic HAP for each regulated material applied during each compliance period.

(f) A record of the mass fraction of coating and printing solids for each coating and printing material applied during each compliance period.

If any allowances were used, the permittee must keep the records outlined in 40 CFR §63.4312(g) and (h).

If there were any deviations, the permittee must keep the records of the date, time, and duration of each deviation, pursuant to 40 CFR §63.4312(i).

- E9-8.** Pursuant to 40 CFR §63.4313, (a) Records must be in a form suitable and readily available for expeditious review, according to 40 CFR §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.
 (b) As specified in 40 CFR §63.10(b)(1), records must be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
 (c) Each record must be kept on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR §63.10(b)(1). The records may be kept off site for the remaining 3 years.

37-0001-12	Source Identification:	Steam Generating Boiler Installation consisting of one (1) 29.41 MM Btu/hr Boiler. Boiler primarily operates on natural gas with No.2 and No. 4 fuel oil as back-up. The boiler is designated as a <i>Unit designed to burn gas 1 fuels</i> and is subject to the requirements of 40 CFR 63: Subpart DDDDD as outlined in Section E12.
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E10. Conditions E10-1 thru E10-10 - apply to source 37-0001-12.

- E10-1.** The stated design heat input for this boiler is 29.41 MMBtu per hour. Should the permittee need to modify the 29.41 MMBtu/hr boiler in a manner that increases the stated design heat input rate, a Title V modification shall first be applied for and received in accordance with TAPCR 1200-03-09-.02(11)(d)1(i)(V) prior to making the change.

TAPCR 1200-03-09-.03(8) and the applications dated October 6, 2014, and November 22, 2021.

Compliance Method: The permittee shall maintain documentation to demonstrate the heat input rate for the 29.41 MMBtu/hr 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.

- E10-2.** Should the permittee need to modify the 29.41 MMBtu/hr boiler to allow the use of a fuel other than natural gas, No. 2 fuel oil, or No. 4 fuel oil, a Title V modification shall first be applied for and received in accordance with TAPCR 1200-03-09-.02(11)(d)1(i)(V) prior to making the change.

TAPCR 1200-03-09-.03(8) and the applications dated October 6, 2014, and November 22, 2021.

Compliance Method: The permittee shall maintain documentation to demonstrate the type(s) of fuel used by the 29.41 MMBtu/hr 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. Compliance with this condition is also assured by complying with Condition E12-3. The boiler is designated as a *Unit designed to burn gas 1 fuels*.

- E10-3.** Particulate matter emitted from this source shall not exceed 9.7 pounds per hour.

TAPCR 1200-03-6-.02(2)(b).

Compliance Method: Compliance with this condition shall be assured through compliance with Condition E10-2 and EPA AP- 42 emission factors for combustion of natural gas, No. 2, and No. 4 fuel oils. These emission factors are listed in the tables below. The permittee shall submit compliance certification for particulate matter from this source annually.
 For fee purposes, recordkeeping of fuel usage shall be conducted using the following logs combined with the use of AP-42 emission factors from Natural Gas Combustion – Tables 1.4-1 and 1.4-2, Supplement to 5th Ed., 3/98 and Criteria Pollutant Emission Factors for Fuel Oil Combustion – Table 1.3-1, Emission Factors for Total Organic Compounds (TOC), Methane, and Nonmethane TOC (NMTOC) From Uncontrolled Fuel Oil Combustion, Table 1.3-3, 5th Ed., 5/2010.

MONTHLY EMISSIONS LOG FROM #2 FUEL COMBUSTION FOR SOURCE 37-0001-12

BOILER # _____ MONTH: _____ # 2 Fuel Oil Usage (10³ gal/month): _____

Pollutant	AP-42 Emission Factor (lb/10 ³ gal)	Emission Rate (tons/month)
PM (TSP)	2	
SO ₂	142S *	
CO	5	
NO _x	20	
VOC (Excluding Methane)	0.2	

S* = indicates that the weight % of sulfur in the oil should be multiplied by the value given.

MONTHLY EMISSIONS LOG FROM # 4 FUEL COMBUSTION FOR SOURCE 37-0001-12

BOILER # _____ MONTH: _____ # 4 Fuel Oil Usage (10³ gal/month): _____

Pollutant	AP-42 Emission Factor (lb/10 ³ gal)	Emission Rate (tons/month)
PM (TSP)	7	
SO ₂	150S *	
CO	5	
NO _x	20	
VOC (Excluding Methane)	0.2	

S* = indicates that the weight % of sulfur in the oil should be multiplied by the value given.

MONTHLY EMISSIONS LOG FROM NATURAL GAS COMBUSTION FOR SOURCE 37-0001-12

MONTH: _____ Natural Gas Usage (10⁶ scf/month): _____

Pollutant	AP-42 Emission Factor (lb/10 ⁶ scf)	Emission Rate (tons/month)
PM (TSP)	7.6	
SO ₂	0.6	
CO	84	
NO _x	50	
VOC (Excluding Methane)	5.5	

FISCAL YEAR COMBUSTION EMISSIONS LOG FOR SOURCE 37-0001-12 YEAR: _____

MONTH	PM EMISSIONS (tons)	SO ₂ EMISSIONS (tons)	NO _x EMISSIONS (tons)	VOC EMISSIONS (tons)	CO EMISSIONS (tons)
TOTALS					

Fuel oil sulfur content shall be determined by fuel supplier certification and must be retained for a period of at least five (5) years. This certification shall include the following:

1. The name of the oil supplier;
2. Sulfur content of the fuel in percent by weight; or in the case of No. 2 oil, a statement from the oil supplier that the oil complies with the specification for fuel oil No.2, as defined by the American Society of Testing and Materials in ASTM D396-78, "Standard Specification for Fuel Oil".

Monthly fuel oil usage shall be determined from purchase records and tank inventories. These logs and records shall be retained for a period of not less than five (5) years.

E10-4. Sulfur dioxide emitted from this source shall not exceed 4.0 pounds per million Btu heat input (117.16 pounds per hour maximum).

TAPCR 1200-03-14-.02(1)(a).

Compliance Method: A sulfur content of the oil combusted of 0.5 % or less shall be deemed as complying with this condition. If fuel oil having a sulfur content greater than 0.5 % is combusted, daily records of fuel usage in the boiler, fuel oil sulfur content, along with calculations using the AP-42 Criteria Pollutant Emission Factors for Fuel Oil Combustion –Table 1.3-1, 5th Ed., 5/2010, shall be provided for demonstrating compliance with this condition. Fees shall be determined through recordkeeping of fuel usage and sulfur content using the logs specified in Condition 3, combined with the use of AP-42 emission factors from Natural Gas Combustion – Tables 1.4-1 and 1.4-2, Supplement to 5th Ed., 3/98 and Criteria Pollutant Emission Factors for Fuel Oil Combustion –Table 1.3-1, 5th Ed., 5/2010.

E10-5. Sulfur dioxide emitted from the 29.41 MMBtu/hr Boiler shall not exceed 39.16 tons per calendar year from the use of No.4 oil.

TAPCR 1200-03-14-.01(3) and information contained in the agreement letter dated May 23, 2023 (Attachment 6). This yearly limit was established to avoid PSD as a result of adding No. 4 oil capability. This limitation will also keep other pollutants below PSD limits.

Compliance Method: Compliance with this emission limitation shall be certified through recordkeeping of fuel usage using the logs specified in Condition E10-3., combined with the use of AP-42, Criteria Pollutant Emission Factors for Fuel Oil Combustion – Table 1.3-1.

PSD AVOIDANCE ICG/HOLLISTON YEARLY SO₂ EMISSIONS LOG FOR SOURCE 37-0001-12
 # 4 OIL USAGE YEAR: _____

MONTH	SO ₂ EMISSIONS RATE (lb/month)	SO ₂ EMISSIONS RATE (tons/month)
TOTAL		

E10-6. Nitrogen oxides (NO_x) emitted from this source shall not exceed 4.2 pounds per hour.

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

Compliance Method: Compliance with this emission limitation shall be certified through recordkeeping of fuel usage using the logs specified in Condition E10-3.

E10-7. Carbon Monoxide (CO) emitted from this source shall not exceed 2.47 pounds per hour.

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

Compliance Method: Compliance with this emission limitation shall be certified through recordkeeping of fuel usage using the logs specified in Condition E10-3.

E10-8. Volatile Organic Compounds (VOC) emitted from this source shall not exceed 0.16 pounds per hour.

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

Compliance Method: Compliance with this emission limitation shall be certified through recordkeeping of fuel usage using the logs specified in Condition E10-3.

E10-9. Visible emissions from this fuel oil burning boiler must meet an emission limit of twenty (20) percent opacity except for one six (6) minute period per hour as specified in Federal New Source Performance Standard (NSPS) for Small Steam Generating Units, 40 CFR Part 60, Subpart Dc. The opacity is to be measured by EPA Method 9, as published in the Federal Register, Volume 39, Number 219 on November 12, 1974.

E10-10. The source is subject to Federal NSPS Standards as specified in paragraph §60.48c of 40 CFR Part 60, Subpart Dc, for reporting and recordkeeping requirements, and to show compliance with the sulfur content of the fuel oil (Condition E10-3) by supplier certification. The operator shall maintain the records of fuel supplier certification, which shall contain the name of the supplier and a statement from the supplier that the oil complies with the specifications. A quarterly report shall be submitted to the Division, which shall include, in addition to records of fuel supplier certification, a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certification submitted; represent all of the fuel combusted during the quarter.

37-0001-16	Source Identification:	Eight (8) each, 0.8MM Btu/hr. natural gas-fired Heaters – Zone gas fired convection Tenter Drying Ovens frame with pin clips. The units will dry web coatings on cloth, paper, and material substrates using water-based coating.
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E11. Conditions E11-1 thru E11-7 - apply to source 37-0001-16.

E11-1. Volatile Organic Compounds emitted from this source shall not exceed 15.0 tons during all intervals of twelve (12) consecutive months.

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

Compliance Method: Compliance with this emission limit is satisfied by meeting the requirements of Conditions E11-2 and E11-4 of this permit; and the emission factor for natural gas combustion from AP-42. (Enclosed as Attachment #2)

E11-2. The combined total maximum heat input capacity for this source shall not exceed 6.4 MMBtu/hr. Should the permittee need to modify the natural gas-fired heaters in a manner that increases the stated design heat input rate, a Title V modification shall first be applied for and received in accordance with TAPCR 1200-03-09-.02(11)(d)1(i)(V) prior to making the change.

TAPCR 1200-03-09-.03(8) and the applications dated October 6, 2014, and November 22, 2021.

Compliance Method: The permittee shall maintain documentation to demonstrate the heat input rate for the natural gas-fired heaters. 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.

E11-3. Particulate matter emitted from this source shall not exceed 3.84 pounds per hour.

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

Compliance Method: Compliance with this emission limit shall be satisfied by meeting the requirement of Conditions E 11-2 and E 11-4; and the emission factor for natural gas combustion from AP-42 (enclosed as Attachment #2)

E11-4. Only natural gas shall be used as fuel for this source. Should the permittee need to modify the natural gas-fired heaters to allow the use of a fuel other than natural gas, a Title V modification shall first be applied for and received in accordance with TAPCR 1200-03-09-.02(11)(d)1(i)(V) prior to making the change.

TAPCR 1200-03-09-.03(8) and the applications dated October 6, 2014, and November 22, 2021.

Compliance Method: The permittee shall maintain documentation to demonstrate the type(s) of fuel used by the natural gas-fired heaters. 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.

E11-5. Sulfur dioxide emitted from this source shall not exceed 39.0 tons during all intervals of twelve (12) consecutive months.

TAPCR 1200-03-14-.02(2)(a).

Compliance Method: Compliance with this emission limit shall be satisfied by meeting the requirement of Condition E 11-2 and E11-4; and the emission factor for natural gas combustion from AP-42 (enclosed as Attachment #2).

40 CFR Part 63, Subpart DDDDD Requirements.

Conditions E12.-E12-13. apply to sources 37-0001-02 and 37-0001-12

E12. 40 CFR Part 63, Subpart DDDDD Requirements. NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR MAJOR SOURCES: INDUSTRIAL, COMMERCIAL, AND INSTITUTIONAL BOILERS AND PROCESS HEATERS

E12-1. Pursuant to 40 CFR §63.7495(b), a facility which owns an existing boiler, must comply with 40 CFR 63: Subpart DDDDD no later than January 31, 2016, except as provided in 40 CFR §63.6(i). The facility is currently complying with 40 CFR 63: Subpart DDDDD by being designated as *unit designed to burn gas Ifuels (see condition E12-2.)* The facility is required to submit a Notification of Compliance Status Report as outlined in Condition E12-6.

E12-2. Pursuant to 40 CFR §63.7500(a)(3) and 40 CFR §63.7500(b), (a)(3) At all times, the permittee must operate and maintain any affected source (as defined in 40 CFR §63.7490), including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.
(b) As provided in 40 CFR §63.6(g), EPA may approve use of an alternative to the outlined work practice standards.

E12-3A. Pursuant to 40 CFR §63.7500(e), boilers and process heaters in the units designed to burn gas 1 fuels are not subject to the emission limits in Tables 1 and 2 or 11 through 13 to Subpart DDDDD, or the operating limits in Table 4 to Subpart DDDDD. *Unit designed to burn gas 1 subcategory* includes any boiler or process heater that burns only natural gas, refinery gas, and/or other gas 1 fuels. Gaseous fuel boilers and process heaters that burn liquid fuel for periodic testing of liquid fuel, maintenance, or operator training, not to exceed a combined total of 48 hours during any calendar year, are included in this definition. Gaseous fuel boilers and process heaters that burn liquid fuel during periods of gas curtailment or gas supply interruptions of any duration are also included in this definition. 40 CFR §63.7575

E12-3B. Pursuant to 40 CFR §63.7500(f) and 40 CFR §63.7505(a), the permittee shall comply with the emission limits, work practice standards, and operating limits. These limits apply at all times the affected unit is operating, except during periods of startup and shutdown.

E12-4. Pursuant to 40 CFR §63.7510(e), the permittee must complete the one-time energy assessment as specified in Table 3 to 40 CFR 63: Subpart DDDDD, containing the following criteria as outlined below:

- (a) A visual inspection of the boiler or process heater system.
- (b) An evaluation of operating characteristics of the boiler or process heater systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints.
- (c) An inventory of major energy use systems consuming energy from affected boilers and process heaters and which are under the control of the boiler/process heater owner/operator.

- (d) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage.
- (e) A review of the facility's energy management practices and provide recommendations for improvements consistent with the definition of energy management practices, if identified.
- (f) A list of cost-effective energy conservation measures that are within the facility's control.
- (g) A list of the energy savings potential of the energy conservation measures identified.
- (h) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.

Compliance Method: The permittee shall keep and maintain records in accordance with **Conditions E12-11 and E12-12.**

E12-5. Pursuant to 40 CFR §63.7515(d) and 40 CFR §63.7540(a)(10), the permittee shall conduct an annual tune-up of the boiler or process heater to demonstrate continuous compliance if the boiler or process heater has a heat input capacity of 10 MMBtu/hr or greater. Each subsequent annual tune-up must be no more than 13 months after the previous tune-up. Affected sources must maintain onsite and submit, if requested by the Technical Secretary, an annual report containing the information in 40 CFR §63.7540(a)(10)(vi)(A) through (C).

E12-6. Pursuant to 40 CFR §63.7545(e), the permittee shall submit the Notification of Compliance Status containing the following information:

(e)(1) A description of the affected unit(s) including identification of which subcategories the unit is in, the design heat input capacity of the unit, a description of the add-on controls used on the unit to demonstrate compliance, description of the fuel(s) burned, including whether the fuel(s) were a secondary material determined by the permittee or the EPA through a petition process to be a non-waste under 40 CFR §241.3 of this chapter, whether the fuel(s) were a secondary material processed from discarded non-hazardous secondary materials within the meaning of 40 CFR §241.3 of this chapter, and justification for the selection of fuel(s) burned during the compliance demonstration.

(e)(8) In addition to the information required in 40 CFR §63.9(h)(2), the notification of compliance status must include the following certification(s) of compliance, as applicable, and signed by a responsible official:

(e)(8)(i) "This facility complies with the required initial tune-up according to the procedures in 40 CFR §63.7540(a)(10)(i) through (vi)."

(e)(8)(ii) "This facility has had an energy assessment performed according to 40 CFR §63.7530(e)."

(e)(8)(iii) Except for units that burn only natural gas, refinery gas, or other gas 1 fuel, or units that qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act, include the following: "No secondary materials that are solid waste were combusted in any affected unit."

The permittee must submit the Notification of Compliance Status before the close of business on the 60th day following the completion of the initial tune-up and energy assessment.

E12-7. Pursuant to 40 CFR §63.7545(a), the permittee shall submit all applicable notifications in 40 CFR §§63.7(b) and (c), 40 CFR 63.8(e), (f)(4) and (6), and 40 CFR 63.9(b) through (h) by the dates specified.

E12-8. Pursuant to 40 CFR §63.7550(a)(b), the permittee shall submit each applicable report in Table 9 (*see Table below*). Unless the Technical Secretary has approved a different schedule for submission of reports, submit each report according to the requirements in 40 CFR §63.7550(b)(1) through (4). For units that are subject only to a requirement to conduct an annual, biennial, or 5-year tune-up (see Table below) and not subject to emission limits or operating limits, affected sources may submit only an annual, biennial, or 5-year compliance report, as applicable, instead of a semi-annual compliance report.

E12-9. Pursuant to 40 CFR §63.7550(c)(5), for facilities subject to tune-up requirements, submit a compliance report with the following information as follows:

(c)(5)(i) Company and Facility name and address.

(c)(5)(ii) Process unit information, emissions limitations, and operating parameter limitations.

(c)(5)(iii) Date of report and beginning and ending dates of the reporting period.

(c)(5)(iv) The total operating time during the reporting period.

(c)(5)(xiv) Include the date of the most recent tune-up for each unit subject to only the requirement to conduct an annual, biennial, or 5-year tune-up. Include the date of the most recent burner inspection if it was not done annually, biennially, or on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown.

(c)(5)(xvii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

E12-10. Pursuant to 40 CFR §63.7550(h)(1) and (h)(3), submit reports according to the specified procedures.
 (h)(1) Within 60 days after the date of completing each performance test (as defined in 40 CFR §63.2), submit the results of the performance tests, including any fuel analyses, following the procedure specified in either paragraph (h)(1)(i) or (h)(1)(ii).

(h)(3) Submit all reports required by Table 9 (*below*) electronically to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX.) The permittee must use the appropriate electronic report in CEDRI. Instead of using the electronic report in CEDRI, submitting an alternate electronic file consistent with the XML schema listed on the CEDRI Web site (<http://www.epa.gov/ttn/chief/cedri/index.html>) is an option, once the XML schema is available. If the reporting form specific to 40 CFR 63: Subpart DDDDD is not available in CEDRI at the time that the report is due, submit the report to the Administrator at the appropriate address listed in 40 CFR §63.13. The permittee must begin submitting reports via CEDRI no later than 90 days after the form becomes available in CEDRI.

E12-11. Pursuant to 40 CFR §63.7555, the permittee shall keep records according to paragraphs (a)(1) and (2) of this condition.
 (a)(1) A copy of each notification and report that was submitted to demonstrate compliance, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report that was submitted, according to the requirements in 40 CFR §63.10(b)(2)(xiv).
 (a)(2) Records of performance tests, fuel analyses, or other compliance demonstrations and performance evaluations as required in 40 CFR §63.10(b)(2)(viii).

E12-12. Pursuant to 40 CFR §63.7555(a)(1)(a2) and 40 CFR §63.7560, records must be in a form suitable and readily available for expeditious review, according to 40 CFR §63.10(b)(1). As specified in 40 CFR §63.10(b)(1), keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Records must be kept onsite or accessible from onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. Records may be kept offsite for the remaining 3 years.

Reference Tables for Condition E12-9 and E12-11.

If the unit is . . .	The permittee must . . .
A boiler or process heater with a continuous oxygen trim system that maintains an optimum air to fuel ratio.	Conduct a tune-up of the boiler or process heater every 5 years in accordance with 40 CFR § 63.7540
A boiler or process heater with heat input capacity of less than 10 million Btu per hour, but greater than 5 million Btu per hour.	Conduct a tune-up of the boiler or process heater biennially in accordance with 40 CFR § 63.7540
A boiler or process heater without a continuous oxygen trim system and with heat input capacity of 10 million Btu per hour or greater.	Conduct a tune-up of the boiler or process heater annually in accordance with 40 CFR § 63.7540
An existing boiler or process heater located at a major source facility, not including limited use units.	Have a one-time energy assessment performed by a qualified energy assessor according to 40 CFR § 63.7530(e). The energy assessment must include the items a. through h. in Table 3 as appropriate for the on-site technical hours listed in 40 CFR § 63.7575

Table 9

The permittee must submit a	The report must contain . . .	The permittee must submit the report . . .
Compliance report	a. Information required in 40 CFR §63.7550(c)(1) as follows: (i) Company and Facility name and address. (ii) Process unit information, emissions limitations, and operating parameter limitations. (iii) Date of report and beginning and ending dates of the reporting period. (iv) The total operating time during the reporting period.	Semiannually, annually, or biennially according to the requirements in 40 CFR §63.7550(b).

	(v) Include the date of the most recent tune-up for each unit subject to only the requirement to conduct an annual tune-up according to 40 CFR §63.7540(a)(10). Include the date of the most recent burner inspection if it was not done annually and was delayed until the next scheduled or unscheduled unit shutdown.	
	b. If there are no deviations from the requirements for work practice standards in Table 3 to 40 CFR 63: Subpart DDDDD that apply to the permittee, a statement that there were no deviations from the work practice standards during the reporting period.	
	c. If the permittee has a deviation from a work practice standard during the reporting period, the report must contain the information in 40 CFR §63.7550(d).	

E12-13. If you operate a unit in the unit designed to burn gas 1 subcategory that is subject to this subpart, and you use an alternative fuel other than natural gas, refinery gas, gaseous fuel subject to another subpart under this part, other gas 1 fuel, or gaseous fuel subject to another subpart of this part or part 60, 61, or 65, you must keep records of the total hours per calendar year that alternative fuel is burned and the total hours per calendar year that the unit operated during periods of gas curtailment or gas supply emergencies.

END OF DRAFT PERMIT NUMBER: 580610

ATTACHMENT 1

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.

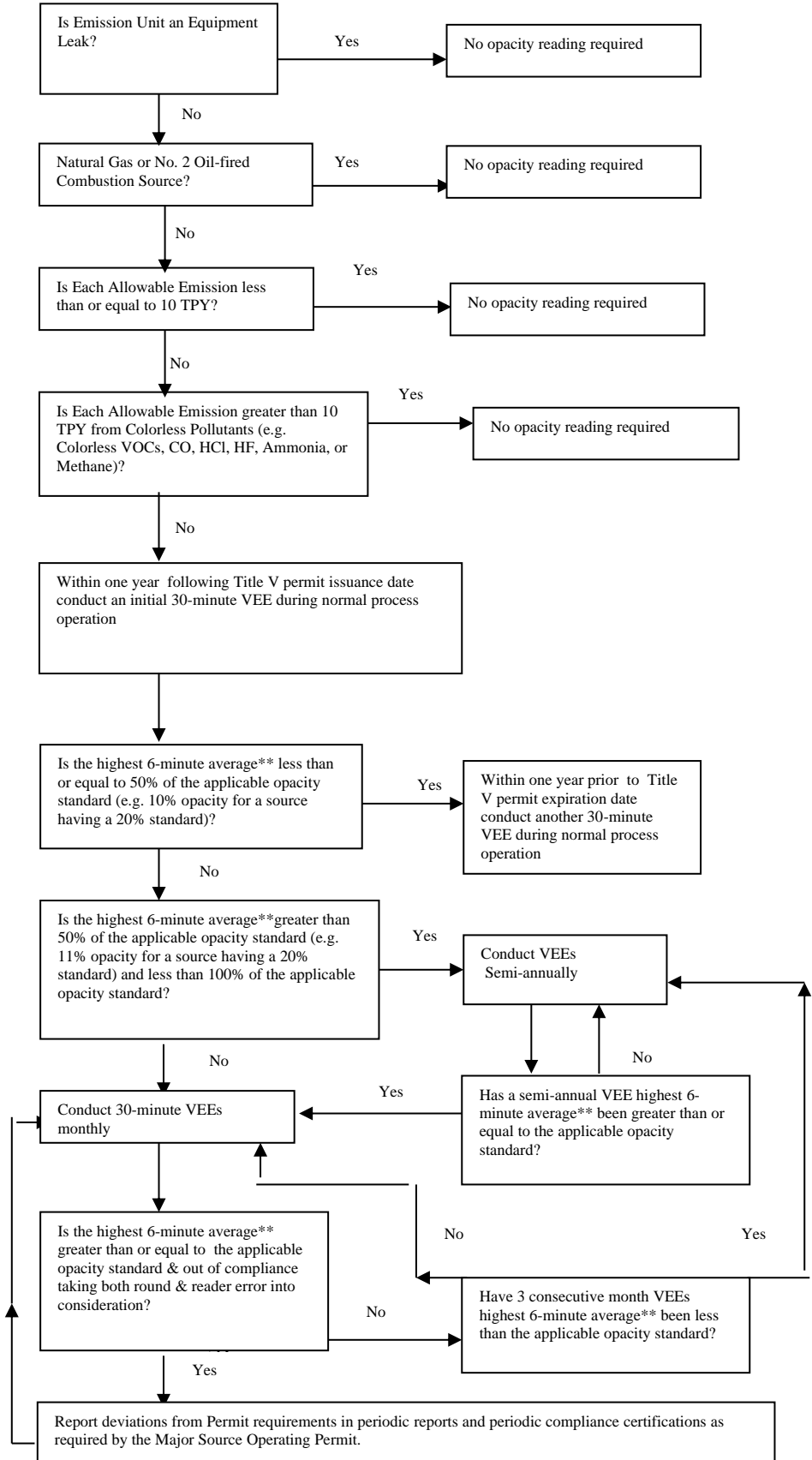
Reader Error
EPA Method 9, Non-NSPS or NESHAPS stipulated opacity standards:
The TAPCD guidance is to declare non-compliance when the highest six-minute average** exceeds the standard plus 6.8% opacity (e.g. 26.8% for a 20% standard).

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

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.

ATTACHMENT 3

AP-42 Emission Factors for Uncontrolled Fuel Oil Combustion

5th Edition, Dated 5/2010

TABLE 1.3-1. CRITERIA POLLUTANT EMISSION FACTORS FOR FUEL OIL COMBUSTION^a – PARTIAL TABLE

Firing Configuration (SCC) ^a	SO ₂ ^b		SO ₃ ^c		NO _x ^d		CO ^e		Filterable PM ^f	
	Emission Factor (lb/10 ³ gal)	EMISSIO N 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									9.19(S)+3.22 ⁱ	
No. 6 oil fired (1-02-004-02/03) (1-03-004-02/03)	157S	A	2S	A	55	A	5	A		B
No. 5 oil fired (1-03-004-04)	157S	A	2S	A	55	A	5	A	10 ⁱ	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 residential 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 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 the average, a function of fuel oil sulfur content where S is the weight % of sulfur in oil. For example, if fuel 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 1.3-3. 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 (1-01-004-01/02/03)	1.28	1.00	0.28
No. 5 oil fired (1-01-004-04)	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 Furnaces (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 1.3-2. 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.

^f References 79-82.

ATTACHMENT 4

Facility-Wide VOC and HAP Emissions Estimation Procedure

Facility VOC and HAP Emissions Estimation Procedure

Holliston Holdings, LLC Church Hill, TN

References: Attachment 1 to ICG Holliston Mills letter: "Response to Comments and Revisions to the Title V Air Permit Application", dated April 26, 2000

APC 26 Attachment 1, Holliston Title V Permit Application, dated October 6, 2014

Operational Flexibility Notification, dated February 13, 2020

This document has been updated from the 2014 version to include procedure changes which became necessary with the optional use of off-site (toll) manufactured nitrocellulose jellies and EVA jelly, which had been produced solely on-site at Holliston prior to 2020.

Annual total VOC emissions from the facility are estimated based on net solvent consumption (i.e., year beginning inventory *plus* purchase for the year *minus* year-end inventory *minus* waste solvent shipped), assuming 100% of the Solvents consumed is released to the atmosphere. Holliston Holdings LLC uses HM Blend, Isopropyl Alcohol (IPA), Toluene, Isopropanol, n-butyl Acetate and MIBK, as well as toll-converted VOC-containing EVA jelly, 1/2 Sec Nitrocellulose jelly, and 5/6 Sec Nitrocellulose jelly. The following calculation steps are used:

1. Obtain prior year-end (for example, 2020) inventory for each of the solvents used (in gallons). This value corresponds to beginning year inventory (2021) at hand of the year for which emissions are estimated.
2. Obtain annual (2021) total purchase data for each of the solvents (in gallons).
3. Obtain current year-end (2021) inventory in gallons.
4. Obtain total solvent included in the annual (2021) hazardous waste shipments. Calculate amount of individual solvents included in the shipments (in gallons or lbs) using available composition data or best engineering estimate based on historic data.
5. Calculate annual total solvents consumed in gallons or lbs using the equation: year beginning inventory *plus* purchase for the year *minus* year-end inventory *minus* waste solvent shipped.
6. Set annual VOC emissions (lbs) = annual solvent consumption, assuming 100% of consumed solvents are emitted to the atmosphere.
7. Using annual consumption and average (wt%) composition of the solvents and blended solvents given below, estimate individual HAP emissions:
 - HM Blend: 60% toluene; 16% acetone; 4% isopropyl acetate; 20% isopropyl alcohol (IPA)
 - Toluene: 100% toluene
 - Isopropanol (IPA, anhydrous): 100% IPA
 - n-Butyl Acetate: 100% n-butyl acetate
 - MIBK: 100% MIBK
 - EVA jelly: 55% toluene; 8% acetone; 2% isopropyl acetate; 10% IPA
 - NC 5/6 Jelly Cut: 45.5% toluene; 12.1% acetone; 3% isopropyl acetate; 22.4% IPA
 - NC 1/2 Sec Jelly Cut: 35.2% toluene; 9.4% acetone; 2.35% isopropyl acetate; 24.1% IPA
8. Note that only toluene, methanol and MIBK are HAPs to be included in HAP estimation.
9. All resulting data are arranged in a report table as shown:

Pollutant HAP (y/n)	Toluene	Methanol	MIBK	Total HAPs	Total VOC
	Yes (tons)	Yes (tons)	Yes (tons)	Yes (tons)	(tons)
Total Emissions For Period (tons)					
Total Emissions For Period (lbs)					

Revision: November 23, 2021

ATTACHMENT 5

Insignificant Emission Units

Holliston Holdings, LLC, Church Hill, TN [37-0001]

Estimated SO₂ Emissions from Gas-fired Insignificant Emission Units (IEUs)

AP-42 SO₂ Emission factor = 0.6 lb/mmcf OR = 0.6/1020 lb/MMBtu

Annual Hours of Operation = 540

Exhaust ID	Description	Manufacturer/ Model	Capacity (Max)	Annual SO ₂ Emissions		Comments
				lbs/year	tons/year	
E1W	1 Compactor Area Heater #1	White Rogers 21D18-3	250,000 BTU	0.0794	3.97E-05	
E2W	2 Compactor Area Heater #2	White Rogers 21D18-3	250,000 BTU	0.00	0.00	Not working
E3W	3 Warehouse Heater #1	White Rogers 21D18-3	250,000 BTU	0.0794	3.97E-05	
E6W	4 Warehouse Heater #2	White Rogers 21D18-3	250,000 BTU	0.00	0.00	Not working
E7W	5 Warehouse Heater #3	White Rogers 21D18-3	250,000 BTU	0.0794	3.97E-05	
E9W	6 Warehouse Heater #4	White Rogers 21D18-3	250,000 BTU	0.0794	3.97E-05	
E10W	7 Warehouse Heater #5	White Rogers 21D18-3	250,000 BTU	0.0794	3.97E-05	
None	8 Maintenance Heater		85,000 BTU	0.00	0.00	Not working
P6A	9 Saturator Oven		85,000 BTU	0.0270	1.35E-05	
None	10 Coater #15 Heater		85,000 BTU	0.00	0.00	Not working
None	11 Warehouse Heater		85,000 BTU	0.00	0.00	Not working
None	12 Coating Dept. Heater #1	North American 223 FGC-6	85,000 BTU	0.0270	1.35E-05	
None	13 Coating Dept. Heater #2	North American 223 FGC-6	85,000 BTU	0.0270	1.35E-05	
None	14 Coating Dept. Heater #3			0.00	0.00	Not working
None	15 Coating Dept. Heater #4			0.00	0.00	Not working
None	16 Pest House Heater #1			0.00	0.00	Not working
None	17 Pest House Heater #2			0.00	0.00	Not working
None	18 Pest House Heater #3			0.00	0.00	Not working
None	19 Pest House Heater #4			0.00	0.00	Not working
P1A, P2A, P3A	Tenter #1		85,000 BTU	0.0270	1.35E-05	Gas oven
P4A, P5A, P6A	Tenter #2			0.00	0.00	Not working
P7A, P8A, P9A, P10A	Tenter #3		85,000 BTU	0.0270	1.35E-05	Gas oven
P20A, P21A	Tenter #5		85,000 BTU	0.0270	1.35E-05	Gas oven 2 roof exhausts
None	Starch/WhiteCloth Area Heaters (2)	White Rogers 21D	17,000 BTU	0.0108	5.40E-06	
None	Portable Heaters (2)	Master	110,000 BTU	0.0349	1.75E-05	One heater does not work
Total Annual SO₂ Emissions				0.6048	0.00030	

NOTES:

- SO₂ Emissions from Natural gas-fired Insignificant Emission Units (IEUs) only
- AP-42 SO₂ Emissions Factor from "Commercial-size" heaters is used (Ref: Table 1.4-2 AP-42 Emission Factors July 1, 1998 Edition)
- These heaters operate to provide "comfort heating" when building temperature is at or below 32 degrees F
- These heaters also operate for "fire safety" (to keep ceiling sprinkler pipes from freezing) when ceiling-level temperature is at or below 32 degrees F
- Based on historical data, it is estimated that ceiling-level temperature is at or below 32 degrees F, for 6 hours each day during winter months (December, January, and February)
(Ref: <https://weatherspark.com/y/17162/Average-Weather-in-Church-Hill-Tennessee-United-States-Year-Round>)
- When the units are operating, it is assumed that the unit is being fired at "Maximum Capacity"
- Units identified as "Not Working" have their respective fuel and electrical lines disconnected (verified on-site June 2023)

ATTACHMENT 6

Source 02 and 12 SO₂ Agreement Letter



Holliston Holdings LLC
905 Holliston Mills Rd.
Church Hill, TN. 37642
www.holliston.com



423-357-6141 *phone*
800-251-0251 *customer service*
423-357-3893 *int'l phone*
800-325-0351 *fax*

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

RE: Permit Agreement Letter
Holliston Holdings, LLC
[905 Holliston Mills Road, Church Hill, TN 37642]
Emission Source Reference: APC Facility ID 37-0001 - Source #s 02 and 12 / Permit No. 580610

Dear Technical Secretary:

On behalf of Holliston Holdings, LLC, the following limitations are agreed upon for listed sources for the above referenced facility:

Source # 02 (39 MMBtu/hr Springfield Boiler)

- Sulfur dioxide emitted from the 39 MMBtu/hr Springfield Boiler shall not exceed 39.0 tons per calendar year from the use of No. 6 oil. This yearly limit was established to avoid PSD as a result of adding No.6 oil capability. This limitation will also keep other emitted pollutants, during No. 6 fuel oil firing, to be below their respective applicable PSD limits.

Holliston Holdings, LLC shall demonstrate compliance with this limit by recordkeeping of monthly No. 6 fuel oil use, on a calendar month basis, and using the applicable AP-42 Emission Factor for sulfur dioxide (provided in Attachment III of the above referenced permit) to calculate monthly sulfur dioxide emissions, and to sum the calculated calendar monthly sulfur dioxide emissions to compute calendar year total sulfur dioxide emissions. Calculated sulfur dioxide emissions shall be presented with at least one significant digit after the decimal point. Compliance with other applicable PSD pollutant limits will be demonstrated using the same procedure used for sulfur dioxide. [Note: Sulfur dioxide emissions cap to avoid PSD limit was originally established under a construction permit issued by TDEC dated May 25, 2000, and subsequently memorialized through Permit Condition E5-5 of the facility's Title V air permit, and in subsequent renewals of the permit.



Holliston Holdings LLC
905 Holliston Mills Rd.
Church Hill, TN. 37642
www.holliston.com



423-357-6141 *phone*
800-251-0251 *customer service*
423-357-3893 *int'l phone*
800-325-0351 *fax*

Source # 12 (29.41 MMBtu/hr Boiler)

- Sulfur dioxide emitted from the 29.41 MMBtu/hr Springfield Boiler shall not exceed 39.16 tons per calendar year from the use of No. 4 oil. This yearly limit was established to avoid PSD as a result of adding No. 4 oil capability. This limitation will also keep other emitted pollutants, during No. 4 fuel oil firing, to be below their respective applicable PSD limits.

Holliston Holdings, LLC shall demonstrate compliance with this limit by recordkeeping of monthly No. 4 fuel oil use, on a calendar month basis, and using the applicable AP-42 Emission Factor for sulfur dioxide (provided in Attachment III of the above referenced permit) to calculate monthly sulfur dioxide emissions, and to sum the calculated calendar monthly sulfur dioxide emissions to compute calendar year total sulfur dioxide emissions. Calculated sulfur dioxide emissions shall be presented with at least one significant digit after the decimal point. Compliance with other applicable PSD pollutant limits will be demonstrated using the same procedure used for sulfur dioxide. [Note: Sulfur dioxide emissions cap to avoid PSD limit was originally established under an agreement letter with TDEC dated January 4, 2005, and subsequently memorialized through Permit Condition E10-5 of the facility's Title V air permit, and in subsequent renewals of the permit.

Should you have any questions or require additional information, please contact Eric Cook via phone at 216-212-7787 or via e-mail at ecook@holliston.com.

On behalf of Holliston Holdings, LLC, I agree to the above limitations. I am authorized to represent and bind the facility in environmental affairs.

Signature:



Name (Printed): Eric Cook

Title: President

Date:

5/23/23

ATTACHMENT 7

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.

