MEMORANDUM

January 9, 2013

TO: Phillip Fielder, P.E., Permits and Engineering Group Manager

THROUGH: Kendal Stegmann, Senior Environmental Manager, Compliance and Enforcement

THROUGH: Phil Martin, P.E., Manager, Existing Source Permits Section

THROUGH: Peer Review

FROM: David Schutz, P.E., New Source Permits Section

SUBJECT: Evaluation of Permit Application No. 2012-776-TVR

Pliant Corporation
Plastic Film Manufacturing
McAlester, Pittsburg County, Oklahoma
Directions from Junction of US-270 and Indian Nations Turnpike, East 1 Mile to New Baker Road, South 2 Miles to Facility.
Latitude: 34.92177°, Longitude -95.82148°

SECTION I. INTRODUCTION

The Pliant Corporation has applied for a renewed operating permit for a plastic film plant (SIC 3081). The facility commenced operations in 1985 and is currently operating under Permit No. 2007-110-TV (M-1) issued December 14, 2010. In addition, Permit No. 2007-110-C (M-2) was issued January 21, 2011, and extended on June 4, 2012, for one year.

There are no significant changes to the permit in the renewal. The application asked to add an alternate operating scenario for operations with the corona treaters turned off, but this scenario would result only in lower emissions than are currently permitted for each treater.

Since the facility potentially emits more than 100 TPY of a regulated pollutant, it is subject to Title V permitting requirements. Emission units (EUs) have been arranged into Emission Unit Groups (EUGs) in the following outline.
SECTION II. PROCESS DESCRIPTION

The facility manufactures plastic film from polyethylene, polypropylene, and ethylene vinyl acetate pellets. The resins are passed through a vacuum loader into a mixing blender. Plastic pellets proceed from the blender to an extrusion operation, where the pellets are melted then forced through breaker plates and then circular or flat dies. The flat plastic from extrusion passes through embossing rolls, nip rolls, and idler rolls to “corona treaters” where ozone is generated by treating the plastic surface with electrostatic discharge. The treated film is then collected on rolls and packaged for shipment.

The facility currently includes four printing presses which print designs on the plastic film products for specific end users. The printing presses are vented to two RTOs for control of VOC emissions. Those RTOs are ducted to a common manifold so that printing operations and emissions control can continue even if an RTO is down for maintenance or malfunction.

Previously-existing operations at this facility included film-forming, corona treating stations, printing operations, a pyrolysis furnace, and a laboratory. The breaker plates are regularly removed and heated in the pyrolysis furnace to burn off plastic accumulation. The pyrolysis oven is a Pollution Control Products oven with a rated capacity of 10 lb/hr of combustible material. Burners in the unit are fueled with a total of 0.30 MMBTUH of natural gas.

SECTION III. EQUIPMENT

EUG 1 is the plant as a whole.

EUG 2: Plastic Film Lines

<table>
<thead>
<tr>
<th>Point ID</th>
<th>Unit ID</th>
<th>Description</th>
<th>Plastic Process Rates</th>
<th>Electric Power Usage, kW*</th>
<th>Installed Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>S-2</td>
<td>FL-7</td>
<td>Plastic Film Line No. 7</td>
<td>500 lb/hr, 4.4 MM</td>
<td>15</td>
<td>8/86</td>
</tr>
<tr>
<td>S-1</td>
<td>FL-14</td>
<td>Plastic Film Line No. 14</td>
<td>1100 lb/hr, 9.6 MM</td>
<td>11.25</td>
<td>3/86</td>
</tr>
<tr>
<td>S-7</td>
<td>FL-15</td>
<td>Plastic Film Line No. 15</td>
<td>400 lb/hr, 3.5 MM</td>
<td>15</td>
<td>11/85</td>
</tr>
<tr>
<td>S-3</td>
<td>FL-16</td>
<td>Plastic Film Line No. 16</td>
<td>1100 lb/hr, 9.6 MM</td>
<td>15</td>
<td>6/87</td>
</tr>
<tr>
<td>S-5</td>
<td>FL-18</td>
<td>Plastic Film Line No. 18</td>
<td>1100 lb/hr, 9.6 MM</td>
<td>13.13</td>
<td>7/88</td>
</tr>
<tr>
<td>S-8</td>
<td>FL-19</td>
<td>Plastic Film Line No. 19</td>
<td>1100 lb/hr, 9.6 MM</td>
<td>15</td>
<td>3/90</td>
</tr>
<tr>
<td>S-4</td>
<td>FL-25</td>
<td>Plastic Film Line No. 25</td>
<td>1100 lb/hr, 12.0 MM</td>
<td>40</td>
<td>12/92</td>
</tr>
<tr>
<td>S-9</td>
<td>FL-28</td>
<td>Plastic Film Line No. 28</td>
<td>1100 lb/hr, 9.6 MM</td>
<td>20</td>
<td>1/99</td>
</tr>
</tbody>
</table>

*values are maxima per line; plant-wide electric power usage has a lower limit.
EUG 3: In-Line Printing Lines

<table>
<thead>
<tr>
<th>Point ID</th>
<th>Unit ID</th>
<th>Description</th>
<th>Plastic Process Rates</th>
<th>Electric Power Usage, kW</th>
<th>Material Usage, Gallons per Year, Inks &amp; Solvent</th>
<th>Installed Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>S-12 / S-13</td>
<td>26</td>
<td>Film Printing Line No. 26</td>
<td>410</td>
<td>3.6 MM</td>
<td>40</td>
<td>90,100</td>
</tr>
<tr>
<td>S-12 / S-13</td>
<td>29</td>
<td>Film Printing Line No. 29</td>
<td>2055</td>
<td>18 MM</td>
<td>20</td>
<td>75,450</td>
</tr>
</tbody>
</table>

EUG 4: Film Printing Presses

<table>
<thead>
<tr>
<th>Point ID</th>
<th>Unit ID</th>
<th>Description</th>
<th>Plastic Process Rates</th>
<th>Electric Power Usage, kW</th>
<th>Material Usage, Gallons per Year, Inks &amp; Solvent</th>
<th>Installed Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>S-12 / S-13</td>
<td>PP-1</td>
<td>Film Printing Line No. 1</td>
<td>--</td>
<td>--</td>
<td>20</td>
<td>90,100</td>
</tr>
<tr>
<td>S-12 / S-13</td>
<td>PP-2</td>
<td>Film Printing Line No. 2</td>
<td>--</td>
<td>--</td>
<td>20</td>
<td>48,000</td>
</tr>
</tbody>
</table>

EUG 6: Insignificant Activities

<table>
<thead>
<tr>
<th>Point ID</th>
<th>Unit ID</th>
<th>Equipment</th>
<th>Capacity</th>
<th>Installed Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>S-10</td>
<td>PO-1</td>
<td>Pyrolysis Oven</td>
<td>0.3 MMBTUH</td>
<td>1985</td>
</tr>
<tr>
<td>Fugitive</td>
<td>ST-1</td>
<td>Solvent Tank *</td>
<td>9,600-gal</td>
<td>2010</td>
</tr>
<tr>
<td>Fugitive</td>
<td>ST-2</td>
<td>Solvent Tank *</td>
<td>9,600-gal</td>
<td>2010</td>
</tr>
</tbody>
</table>

*The solvent is normally a blend of n-propanol and propyl acetate with a vapor pressure of 0.3 psia.

EUG 7: Ink Mixing

<table>
<thead>
<tr>
<th>Point ID</th>
<th>Unit ID</th>
<th>Equipment</th>
<th>Capacity</th>
<th>Installed Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>WV-1</td>
<td>MR-1</td>
<td>Ink Mixing Room</td>
<td>--</td>
<td>1997</td>
</tr>
<tr>
<td>WV-1</td>
<td>DU-1</td>
<td>Solvent Distillation Unit</td>
<td>--</td>
<td>2010</td>
</tr>
</tbody>
</table>

SECTION IV. AIR EMISSIONS

The facility includes seven distinct operations that create air emissions. However, the solvent recycling unit is a closed-loop system.

VOC From Plastic Operations

The plastic pellets contain residual aliphatic organic monomers. Emissions estimates were based on annual plastic film production of 87.1 million pounds per year. Estimates of VOC emissions for the existing operations were derived from material usage and the plastic manufacturer’s test data showing an average residual solvent content of 2.7 ppm.
Ozone From Corona Treaters

The corona treatment sections produce ozone directly. The application stated ozone production of 0.071 lb/kW-hr and electrical power usage by the corona treaters of 224.38 kW (1,966,000 kw-hr per year). This estimate is consistent with ozone production rates predicted from the Brynjoljsson formula:

\[ C = \frac{600 \cdot g \cdot i \cdot d}{V} \]

Where \( C \) = production of ozone, cc/sec/m³
\( g \) = number of ozone molecules produced per 100 electron volts of radiation absorbed
\( i \) = current, amperes
\( d \) = path length, meters
\( V \) = cell volume, cubic meters

The cell length and volume are fixed by construction of the unit. Ozone production, thus ozone emissions, is primarily a function of electric current.

There are “ozone destructors” on Line 25, Line 26, Line 28, and Line 29 manufactured by Pillar Company which destroy 95% of the ozone produced. The ozone destructor on Line 7 is 90% efficient.

Ozone control has been estimated for Lines 1 and 2 as 90%, a conservative estimate for mixing ozone an oxidizer) with VOC at elevated temperatures.

<table>
<thead>
<tr>
<th>Process Line No.</th>
<th>Process Weight</th>
<th>Electric Power Usage kW</th>
<th>VOC PPM</th>
<th>lb ozone/ kW-hr</th>
<th>Ozone Control Effic.</th>
<th>VOC Emissions lb/hr</th>
<th>TPY lb/hr</th>
<th>Ozone Emissions lb/hr</th>
<th>TPY</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>---</td>
<td>20</td>
<td>---</td>
<td>0.071</td>
<td>90%</td>
<td>---</td>
<td>---</td>
<td>0.14</td>
<td>0.62</td>
</tr>
<tr>
<td>2</td>
<td>---</td>
<td>20</td>
<td>---</td>
<td>0.071</td>
<td>90%</td>
<td>---</td>
<td>---</td>
<td>0.14</td>
<td>0.62</td>
</tr>
<tr>
<td>7</td>
<td>500</td>
<td>15</td>
<td>2.7</td>
<td>0.071</td>
<td>90%</td>
<td>0.0014</td>
<td>0.006</td>
<td>0.11</td>
<td>0.47</td>
</tr>
<tr>
<td>14</td>
<td>1100</td>
<td>2.7</td>
<td>0.071</td>
<td>---</td>
<td></td>
<td>0.0030</td>
<td>0.013</td>
<td>0.80</td>
<td>3.50</td>
</tr>
<tr>
<td>15</td>
<td>400</td>
<td>2.7</td>
<td>0.071</td>
<td>---</td>
<td></td>
<td>0.0011</td>
<td>0.005</td>
<td>1.07</td>
<td>4.66</td>
</tr>
<tr>
<td>16</td>
<td>1100</td>
<td>2.7</td>
<td>0.071</td>
<td>---</td>
<td></td>
<td>0.0030</td>
<td>0.013</td>
<td>1.07</td>
<td>4.66</td>
</tr>
<tr>
<td>18</td>
<td>1100</td>
<td>2.7</td>
<td>0.071</td>
<td>---</td>
<td></td>
<td>0.0030</td>
<td>0.013</td>
<td>0.93</td>
<td>4.08</td>
</tr>
<tr>
<td>19</td>
<td>1100</td>
<td>2.7</td>
<td>0.071</td>
<td>---</td>
<td></td>
<td>0.0030</td>
<td>0.013</td>
<td>1.07</td>
<td>4.66</td>
</tr>
<tr>
<td>25</td>
<td>1100</td>
<td>2.7</td>
<td>0.071</td>
<td>95%</td>
<td></td>
<td>0.0030</td>
<td>0.013</td>
<td>0.14</td>
<td>0.62</td>
</tr>
<tr>
<td>26</td>
<td>1100</td>
<td>2.7</td>
<td>0.071</td>
<td>95%</td>
<td></td>
<td>0.0030</td>
<td>0.013</td>
<td>0.14</td>
<td>0.62</td>
</tr>
<tr>
<td>28</td>
<td>410</td>
<td>2.7</td>
<td>0.071</td>
<td>95%</td>
<td></td>
<td>0.0011</td>
<td>0.005</td>
<td>0.07</td>
<td>0.31</td>
</tr>
<tr>
<td>29</td>
<td>2055</td>
<td>2.7</td>
<td>0.071</td>
<td>95%</td>
<td></td>
<td>0.0056</td>
<td>0.024</td>
<td>0.07</td>
<td>0.31</td>
</tr>
<tr>
<td>Mix Room</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td></td>
<td>0.50</td>
<td>2.19</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>TOTALS</td>
<td>9965</td>
<td>87.1</td>
<td>244.38</td>
<td>---</td>
<td></td>
<td>0.5272</td>
<td>2.308</td>
<td>5.76</td>
<td>25.13</td>
</tr>
</tbody>
</table>
VOC From Printing

Based on the characteristics (i.e. weight, percent of VOCs and chemical composition) of the various inks, the application developed a “Super Ink” and a “Super Solvent” to be used for compliance. Maximum annual usages were stated in the application at \(303,650\) gallons of “Super Ink” (7.02 lb/gal VOC) and “Super Solvent” blend (6.1 lb/gal VOC). A capture efficiency of 92% of VOC was estimated, with a destruction of 98% of captured solvents, for an overall control efficiency of 90%. Hourly emissions were calculated based on worst-case hourly operations (60% coverage). Stack testing confirmed this value for the RTOs.

Uncontrolled VOC emissions = \(303,650\) gal * 7.02 lb/gal = 2,131,623 lb/yr

Controlled VOC emissions = \((1 – 90\%\text{ control})\) * 2,131,623 lb/yr / 2,000 lb/ton = 106.58 TPY

There are no HAPs in either the ink or solvent. The only emissions of HAPs will be trace amounts of formaldehyde from the RTOs. The facility is an “area source” of HAPs.

RTO Emissions

Emissions from the RTOs were estimated based on heat inputs of 2.73 MMBTUH each for RTO-1 and RTO-2, and natural gas fuel emissions factors in AP-42 (7/98), Section 1.4.

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM\textsubscript{10} (lb/hr)</th>
<th>CO (lb/hr)</th>
<th>NO\textsubscript{x} (lb/hr)</th>
<th>VOC (lb/hr)</th>
<th>SO\textsubscript{2} (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>RTO-1</td>
<td>0.021</td>
<td>0.091</td>
<td>0.229</td>
<td>1.004</td>
<td>0.273</td>
</tr>
<tr>
<td>RTO-2</td>
<td>0.021</td>
<td>0.091</td>
<td>0.229</td>
<td>1.004</td>
<td>0.273</td>
</tr>
<tr>
<td>TOTALS</td>
<td>0.042</td>
<td>0.182</td>
<td>0.458</td>
<td>2.008</td>
<td>0.546</td>
</tr>
</tbody>
</table>

Ink Blending

VOC emissions from the ink blending room were estimated at 0.50 lb/hr and 2.19 TPY. These values were derived from stack testing and allowing for increased throughput of the ink blending operation.

Pyrolysis Oven

The pyrolysis unit emits both natural gas combustion products and products of plastic combustion. The manufacturer supplied estimates of emissions from the pyrolysis oven. The emission rates are for burning 100% plastic at a maximum charge rate of 10 lb/hr of combustible materials.

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM\textsubscript{10} (lb/hr)</th>
<th>CO (lb/hr)</th>
<th>NO\textsubscript{x} (lb/hr)</th>
<th>VOC (lb/hr)</th>
<th>SO\textsubscript{2} (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pyro. Oven</td>
<td>0.040</td>
<td>0.042</td>
<td>0.050</td>
<td>0.060</td>
<td>0.027</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.017</td>
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<td></td>
<td></td>
<td></td>
<td>0.018</td>
</tr>
<tr>
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<td></td>
<td></td>
<td></td>
<td></td>
<td>0.002</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.03</td>
</tr>
</tbody>
</table>
**Total Facility Emissions**

<table>
<thead>
<tr>
<th></th>
<th>PM$_{10}$</th>
<th>CO</th>
<th>NOx</th>
<th>SO$_2$</th>
<th>VOC</th>
<th>Ozone</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>lb/hr TPY</td>
<td>lb/hr TPY</td>
<td>lb/hr TPY</td>
<td>lb/hr TPY</td>
<td>lb/hr TPY</td>
<td>lb/hr TPY</td>
</tr>
<tr>
<td>Treaters</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>0.03</td>
</tr>
<tr>
<td>Pyrolysis Oven</td>
<td>0.040</td>
<td>0.042</td>
<td>0.050</td>
<td>0.060</td>
<td>0.027</td>
<td>0.028</td>
</tr>
<tr>
<td>Printing / RTOs</td>
<td>0.042</td>
<td>0.182</td>
<td>0.458</td>
<td>2.008</td>
<td>0.546</td>
<td>2.392</td>
</tr>
<tr>
<td>Ink Blending</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>0.50</td>
</tr>
<tr>
<td>TOTALS</td>
<td>0.082</td>
<td>0.224</td>
<td>0.508</td>
<td>2.068</td>
<td>0.573</td>
<td>2.420</td>
</tr>
</tbody>
</table>

Emissions from production lines are discharged from 10 stacks:

<table>
<thead>
<tr>
<th>Process Line</th>
<th>Stack No.</th>
<th>Height (ft)</th>
<th>Diameter (Inches)</th>
<th>Flow rate (ACFM)</th>
<th>Temp (°F)</th>
</tr>
</thead>
<tbody>
<tr>
<td>7</td>
<td>S-2</td>
<td>50</td>
<td>7.75</td>
<td>2600</td>
<td>85</td>
</tr>
<tr>
<td>14</td>
<td>S-1</td>
<td>50</td>
<td>7.75</td>
<td>2600</td>
<td>85</td>
</tr>
<tr>
<td>15</td>
<td>S-7</td>
<td>60</td>
<td>7.75</td>
<td>2600</td>
<td>85</td>
</tr>
<tr>
<td>16</td>
<td>S-3</td>
<td>50</td>
<td>7.75</td>
<td>2600</td>
<td>85</td>
</tr>
<tr>
<td>18</td>
<td>S-5</td>
<td>50</td>
<td>7.75</td>
<td>2600</td>
<td>85</td>
</tr>
<tr>
<td>19</td>
<td>S-8</td>
<td>60</td>
<td>7.75</td>
<td>2600</td>
<td>85</td>
</tr>
<tr>
<td>25</td>
<td>S-4</td>
<td>50</td>
<td>7.75</td>
<td>2600</td>
<td>85</td>
</tr>
<tr>
<td>28</td>
<td>S-9</td>
<td>60</td>
<td>7.75</td>
<td>2600</td>
<td>85</td>
</tr>
<tr>
<td>PP-1 &amp; Line 26</td>
<td>S-12</td>
<td>30</td>
<td>31</td>
<td>16,500</td>
<td>250</td>
</tr>
<tr>
<td>PP-2 &amp; Line 29</td>
<td>S-13</td>
<td>30</td>
<td>31</td>
<td>16,500</td>
<td>250</td>
</tr>
</tbody>
</table>

**Greenhouse Gases**

Potential emissions of CO$_2$e were stated at 1,983 TPY. The facility is a minor source of GHG.

**SECTION V. INSIGNIFICANT ACTIVITIES**

The insignificant activities identified and justified in the application and listed in OAC 252:100-8, Appendix I, are listed below. Recordkeeping for activities indicated with “*” is listed in the Specific Conditions.

- Space heaters, boilers, process heaters and emergency flares less than or equal to 5 MMBTUH heat input (commercial natural gas). The gas-fired heaters are in this category.

- * Storage tanks with less than or equal to 10,000 gallons capacity that store VOL with a vapor pressure less than 1.0 psia at maximum storage temperature. The two new solvent storage tanks are in this category.

- * Emissions from storage tanks constructed with a capacity less than 39,894 gallons which store VOC with a vapor pressure less than 1.5 psia at maximum storage temperature. The two new solvent storage tanks are in this category.
- Hazardous waste and hazardous materials drum staging areas.

- Hand wiping and spraying of solvents from containers with less than 1 liter capacity used for spot cleaning and/or degreasing in ozone attainment areas.

- Activities having the potential to emit no more than 5 TPY (actual) of any criteria pollutant. The pyrolysis oven is in this category.

SECTION VI. FEDERAL REGULATIONS

PSD, 40 CFR Part 52 [Not Applicable]
Final total emissions are less than the threshold of 250 TPY of any single regulated pollutant and the facility is not one of the 26 specific industries with a threshold of 100 TPY.

NSPS, 40 CFR Part 60 [Not Applicable]
There are no subparts that affect this process. The following NSPS subparts affect surface coating operations. None of these apply to this facility.

- **Subpart EE** for industrial surface coating of metal furniture does not apply since only plastic films are printed on at this facility.
- **Subpart MM** is for automobile and light duty truck surface coating operations.
- **Subpart QQ** is for the graphic arts industry, in particular in regards to publications using the rotogravure printing process.
- **Subpart RR** covers pressure sensitive tape and label surface coating operations. These materials are not manufactured at this plant.
- **Subpart SS** pertains to industrial surface coating of large appliances and does not apply.
- **Subpart VV** is for equipment leaks of VOCs in the synthetic organic chemicals manufacturing industry. No synthetic organic chemicals are manufactured at this facility.
- **Subpart WW** involves coating the surface of beverage cans, a process not performed at this facility.
- **Subpart DDD** is for VOC emissions from the polymer manufacturing industry. No polymers are manufactured at this facility.
- **Subpart FFF** involves flexible vinyl and urethane coating and printing which calls for rotogravure printing. The polyethylene film printing is flexigraphic rather than rotogravure printing.
- **Subpart SSS** cover magnetic tape coating facilities. Magnetic tape is not coated here.
- **Subpart TTT** covers industrial surface coatings of plastic parts for business machines. This process does not apply to the coating of business machines.

NESHAP, 40 CFR Part 61 [Not Applicable]
None of the eight pollutants subject to NESHAP will be emitted: arsenic, asbestos, benzene, beryllium, mercury, coke oven emissions, radionuclides, or vinyl chloride.
Subpart JJJJ (Paper and Other Web Coatings) specifies standards for major sources of HAPs for printing facilities. This facility is an area source, therefore not subject to this regulation. The permit will specify methods to ensure that HAP emissions are less than the major source thresholds.

Compliance Assurance Monitoring, 40 CFR Part 64
Compliance Assurance Monitoring, as published in the Federal Register on October 22, 1997, applies to any pollutant specific emission unit at a major source, that is required to obtain a Title V permit, if it meets all the following criteria:

- It is subject to an emission limit or standard for an applicable regulated air pollutant.
- It uses a control device to achieve compliance with the applicable emission limit or standard.
- It has potential emissions, prior to the control device, of the applicable regulated air pollutant of 100 TPY.

The RTOs are subject to CAM. CAM requirements are included in this renewal permit.

Chemical Accident Prevention Provisions, 40 CFR Part 68
Toxics subject to this regulation that are present in the facility are not stored on-site in quantities greater than the threshold quantities; therefore, Part 68 is not applicable. More information on this federal program is available on the web page: www.epa.gov/ceppo.

Stratospheric Ozone Protection, 40 CFR Part 82
These standards require phase out of Class I & II substances, reductions of emissions of Class I & II substances to the lowest achievable level in all use sectors, and banning use of nonessential products containing ozone-depleting substances (Subparts A & C); control servicing of motor vehicle air conditioners (Subpart B); require Federal agencies to adopt procurement regulations which meet phase out requirements and which maximize the substitution of safe alternatives to Class I and Class II substances (Subpart D); require warning labels on products made with or containing Class I or II substances (Subpart E); maximize the use of recycling and recovery upon disposal (Subpart F); require producers to identify substitutes for ozone-depleting compounds under the Significant New Alternatives Program (Subpart G); and reduce the emissions of halons (Subpart H).

Subpart A identifies ozone-depleting substances and divides them into two classes. Class I controlled substances are divided into seven groups; the chemicals typically used by the manufacturing industry include carbon tetrachloride (Class I, Group IV) and methyl chloroform (Class I, Group V). A complete phase-out of production of Class I substances is required by January 1, 2000 (January 1, 2002, for methyl chloroform). Class II chemicals, which are hydrochlorofluorocarbons (HCFCs), are generally seen as interim substitutes for Class I CFCs. Class II substances consist of 33 HCFCs. A complete phase-out of Class II substances, scheduled in phases starting by 2002, is required by January 1, 2030.

This facility does not utilize any Class I & II substances in its production operations.
SECTION VIII. OKLAHOMA AIR POLLUTION CONTROL RULES

OAC 252:100-1 (General Provisions) [Applicable]
Subchapter 1 includes definitions but there are no regulatory requirements.

OAC 252:100-2 (Incorporation by Reference) [Applicable]
This subchapter incorporates by reference applicable provisions of Title 40 of the Code of Federal Regulations. These requirements are addressed in the “Federal Regulations” section.

OAC 252:100-3 (Air Quality Standards and Increments) [Applicable]
Primary Standards are in Appendix E, and Secondary Standards are in Appendix F of the Air Pollution Control Rules. At this time, all of Oklahoma is in attainment of these standards.

OAC 252:100-5 (Registration, Emissions Inventory and Annual Operating Fees) [Applicable]
Subchapter 5 requires sources of air contaminants to register with Air Quality, file emission inventories annually, and pay annual operating fees based upon total annual emissions of regulated pollutants. Emission inventories were submitted and fees paid for previous years as required.

OAC 252:100-8 (Permits for Part 70 Sources) [Applicable]
Part 5 includes the general administrative requirements for Part 70 permits. Any planned changes in the operation of the facility that result in emissions not authorized in the permit and that exceed the “Insignificant Activities” or “Trivial Activities” thresholds require prior notification to AQD and may require a permit modification. Insignificant activities refer to those individual emission units either listed in Appendix I or whose actual calendar year emissions do not exceed the following limits.

- 5 TPY of any one criteria pollutant
- 2 TPY of any one hazardous air pollutant (HAP) or 5 TPY of multiple HAPs or 20% of any threshold less than 10 TPY for a HAP that the EPA may establish by rule

Emission limitations and operational requirements necessary to assure compliance with all applicable requirements for all sources are taken from the operating permit application, or developed from the applicable requirement.

OAC 252:100-9 (Excess Emission Reporting Requirements) [Applicable]
Except as provided in OAC 252:100-9-7(a)(1), the owner or operator of a source of excess emissions shall notify the Director as soon as possible but no later than 4:30 p.m. the following working day of the first occurrence of excess emissions in each excess emission event. No later than thirty (30) calendar days after the start of any excess emission event, the owner or operator of an air contaminant source from which excess emissions have occurred shall submit a report for each excess emission event describing the extent of the event and the actions taken by the owner or operator of the facility in response to this event. Request for affirmative defense, as described in OAC 252:100-9-8, shall be included in the excess emission event report. Additional reporting may be required in the case of ongoing emission events and in the case of excess emissions reporting required by 40 CFR Parts 60, 61, or 63.
OAC 252:100-13 (Open Burning)  [Applicable]
Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in this subchapter.

OAC 252:100-19 (Particulate Matter)  [Not Applicable]
Subchapter 19 specifies PM emissions limitations based on heat input capacity for new fuel-burning equipment. However, the RTOs do not meet the definition of “fuel-burning equipment” since no usable heat or power is generated.

OAC 252:100-25 (Visible Emissions and Particulates)  [Applicable]
No discharge of greater than 20% opacity is allowed except for short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity.

OAC 252:100-29 (Fugitive Dust)  [Applicable]
No person shall cause or permit the discharge of any visible fugitive dust emissions beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. Under normal operating conditions, this facility will not cause a problem in this area, therefore it is not necessary to require specific precautions to be taken.

OAC 252:100-31 (Sulfur Compounds)  [Applicable]
Part 5 limits sulfur dioxide emissions from new fuel-burning equipment (constructed after July 1, 1972). For gaseous fuels the limit is 0.2 lb/MMBTU heat input averaged over 3 hours. For fuel gas having a gross calorific value of 1,000 BTU/SCF, this limit corresponds to fuel sulfur content of 1,203 ppmv. The permit requires the use of gaseous fuel with sulfur content less than 343 ppmv to ensure compliance with Subchapter 31.

OAC 252:100-33 (Nitrogen Oxides)  [Not Applicable]
Subchapter 33 specifies nitrogen oxides emission limitations from any new gas-fired fuel-burning equipment with a rated heat input of 50 MMBTUH or more. The pyrolysis oven is below this threshold. The RTOs do not meet the definition of “fuel-burning equipment” since no usable heat or power is generated.

OAC 252:100-35 (Carbon Monoxide)  [Not Applicable]
None of the following affected processes are part of this project: gray iron cupola, blast furnace, basic oxygen furnace, petroleum catalytic cracking unit or petroleum catalytic reforming unit.
OAC 252:100-37 (Organic Materials)  [Part 7 Applicable]
Part 3 affects storage tanks constructed after December 28, 1974, with a capacity between 400 and 40,000 gallons storing a liquid with a vapor pressure of 1.5 psia or more. The storage tanks added in this project have vapor pressures below 1.5 psia.
Part 5 limits the organic solvent content of coating of parts and products. It specifically establishes limits for alkyd primers, vinyls, NC lacquers, acrylics, epoxies, maintenance finishes, and custom product finishes. No limits have been established for inks. Therefore, this part does not apply.
Part 7 requires all fuel-burning equipment to be operated and maintained so as to minimize emissions. Temperature and available air must be sufficient to provide essentially complete combustion. The equipment at this location is subject to this requirement.

OAC 252:100-42 (Toxic Air Contaminants (TAC))  [Applicable]
This subchapter regulates toxic air contaminants (TAC) that are emitted into the ambient air in areas of concern (AOC). Any work practice, material substitution, or control equipment required by the Department prior to June 11, 2004, to control a TAC, shall be retained, unless a modification is approved by the Director. Since no AOC has been designated there are no specific requirements for this facility at this time.

OAC 252:100-43 (Testing, Monitoring, and Recordkeeping)  [Applicable]
This subchapter provides general requirements for testing, monitoring and recordkeeping and applies to any testing, monitoring or recordkeeping activity conducted at any stationary source. To determine compliance with emissions limitations or standards, the Air Quality Director may require the owner or operator of any source in the state of Oklahoma to install, maintain and operate monitoring equipment or to conduct tests, including stack tests, of the air contaminant source. All required testing must be conducted by methods approved by the Air Quality Director and under the direction of qualified personnel. A notice-of-intent to test and a testing protocol shall be submitted to Air Quality at least 30 days prior to any EPA Reference Method stack tests. Emissions and other data required to demonstrate compliance with any federal or state emission limit or standard, or any requirement set forth in a valid permit shall be recorded, maintained, and submitted as required by this subchapter, an applicable rule, or permit requirement. Data from any required testing or monitoring not conducted in accordance with the provisions of this subchapter shall be considered invalid. Nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

The following Oklahoma Air Pollution Control Rules are not applicable to this facility:

<table>
<thead>
<tr>
<th>Rule Number</th>
<th>Rule Type</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>OAC 252:100-11</td>
<td>Alternative Reduction</td>
<td>not eligible</td>
</tr>
<tr>
<td>OAC 252:100-15</td>
<td>Mobile Sources</td>
<td>not in source category</td>
</tr>
<tr>
<td>OAC 252:100-17</td>
<td>Incinerators</td>
<td>not type of emission unit</td>
</tr>
<tr>
<td>OAC 252:100-23</td>
<td>Cotton Gins</td>
<td>not type of emission unit</td>
</tr>
<tr>
<td>OAC 252:100-24</td>
<td>Feed &amp; Grain Facility</td>
<td>not in source category</td>
</tr>
<tr>
<td>OAC 252:100-39</td>
<td>Nonattainment Areas</td>
<td>not in a subject area</td>
</tr>
<tr>
<td>OAC 252:100-47</td>
<td>Landfills</td>
<td>not type of source category</td>
</tr>
</tbody>
</table>
SECTION IX. COMPLIANCE

Tier Classification And Public Review

This application has been determined to be a Tier II based on being an application for a renewal of an existing major source permit. The “Notice of Filing Tier II Application” was published in the McAlester News-Capital on July 24, 2012. The notice stated that the application was available for review at the facility at the McAlester Public Library. The applicant will also publish a “Notice of Tier II Draft Permit” in the McAlester News-Capital. The facility is not located within 50 miles of the Oklahoma border.

The applicant has submitted an affidavit that they are not seeking a permit for land use or for any operation upon land owned by others without their knowledge. The affidavit certifies that the applicant owns the property.

Information on all permit actions is available for review by the public in the Air Quality section of the DEQ Web page: http://www.deq.state.ok.us/

Inspection

The facility was inspected on December 1, 2010, by Helen King of the Tulsa Regional Office. No violations were noted from the inspection.

Stack Testing

Stack tests were conducted on the two RTOs on April 18, 2012. RTO No. 1 showed 99.2% control efficiency for VOC, while RTO No. 2 showed 99.5% control. Capture efficiency of the system was 101%. These results are in compliance with applicable requirements.

Fees Paid

Title V permit renewal fee of $2,000.

SECTION X. SUMMARY

The facility was constructed and operated as described in the permit application. Ambient air quality standards are not threatened at the site. There are no active compliance or enforcement Air Quality issues concerning this facility. Issuance of the permit is recommended, contingent on public and EPA review.
Pliant Corporation
Plastic Film Manufacturing

Permit No. 2012-776-TVR

The permittee is authorized to operate in conformity with the specifications submitted to the Air Quality Division on July 6, 2012. The Evaluation Memorandum dated January 9, 2013, explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating limitations or permit requirements. Continuing operations under this permit constitutes acceptance of, and consent to, the conditions contained herein:

1. Points of emissions and emission limitations for each point: [OAC 252:100-8-6(a)]

**EUG 2: Plastic Film Lines**

<table>
<thead>
<tr>
<th>Process Line No.</th>
<th>Stack ID</th>
<th>Ozone</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>lb/hr</td>
</tr>
<tr>
<td>7</td>
<td>2</td>
<td>0.11</td>
</tr>
<tr>
<td>14</td>
<td>1</td>
<td>0.80</td>
</tr>
<tr>
<td>15</td>
<td>7</td>
<td>1.07</td>
</tr>
<tr>
<td>16</td>
<td>3</td>
<td>1.07</td>
</tr>
<tr>
<td>18</td>
<td>5</td>
<td>0.93</td>
</tr>
<tr>
<td>19</td>
<td>8</td>
<td>1.07</td>
</tr>
<tr>
<td>25</td>
<td>4</td>
<td>0.14</td>
</tr>
<tr>
<td>28</td>
<td>9</td>
<td>0.14</td>
</tr>
</tbody>
</table>

A. Ozone emissions from Lines No. 25, 26, 28, and 29 shall be controlled with the use of a 95% efficient ozone destructor when the ozone generators are operated. Ozone emissions from Line No. 7 shall be controlled with the use of a 90% efficient ozone destructor when the ozone generators are operated. The devices shall be maintained per manufacturer specifications. The manufacturer operating specifications shall be readily accessible for inspection.

**EUG 3 and EUG 4: Printing Lines**

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM$_{10}$ (lb/hr)</th>
<th>CO (lb/hr)</th>
<th>NOx (lb/hr)</th>
<th>VOC (lb/hr)</th>
<th>Ozone (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>RTO-1, Line 29 and Printing Press 1</td>
<td>0.042</td>
<td>0.182</td>
<td>0.458</td>
<td>2.008</td>
<td>0.546</td>
</tr>
<tr>
<td>RTO-2, Line 26 and Printing Press 2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
A. Ink / solvent blends used at this facility shall not exceed 6.1 lb/gal VOC. The total concentration of all HAPs in inks and solvents shall be less than 0.01 lb/gal.

B. Usage of organic solvent may be determined as the difference between input and amounts recovered for disposal.

C. VOC discharges from Lines 1, 2, 26, and 29 shall be processed by a regenerative thermal oxidizer or equivalent device which achieves at least 98% destruction of VOC or reduces VOC concentrations to 20 ppm or less. Collection system from the process lines shall be operated which achieve at least 92% capture of emissions from all processes. The RTOs shall be operated at a temperature of at least 1,600°F when processing emissions from printing lines.

EUG 6: Insignificant Activities The following units’ emissions are estimated based on existing equipment items but do not have a specific limitation and are considered insignificant activities.

<table>
<thead>
<tr>
<th>Point ID</th>
<th>Unit ID</th>
<th>Equipment</th>
<th>Capacity</th>
<th>Installed Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>S-10</td>
<td>PO-1</td>
<td>Pyrolysis Oven</td>
<td>0.3 MMBTUH</td>
<td>1985</td>
</tr>
<tr>
<td>Fugitive</td>
<td>ST-1</td>
<td>Solvent Tank</td>
<td>9,600-gal</td>
<td>2010</td>
</tr>
<tr>
<td>Fugitive</td>
<td>ST-2</td>
<td>Solvent Tank</td>
<td>9,600-gal</td>
<td>2010</td>
</tr>
</tbody>
</table>

A. The pyrolysis furnace shall only be fired with commercial-grade natural gas. A gas-phase residence time of no less than one second at a temperature no less than 1,350°F shall be maintained in the pyrolysis oven secondary chamber when processing breaker plates and dies.

EUG 7: Ink Mixing

<table>
<thead>
<tr>
<th>Point ID</th>
<th>Unit ID</th>
<th>Equipment</th>
<th>VOC Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>lb/hr</td>
</tr>
<tr>
<td>WV-1</td>
<td>MR-1</td>
<td>Ink Mixing Room</td>
<td>0.50</td>
</tr>
<tr>
<td>WV-1</td>
<td>DU-1</td>
<td>Solvent Distillation Unit</td>
<td>--</td>
</tr>
</tbody>
</table>

A. The solvent distillation unit is to be a closed loop with no continuously-operated vent.

2. The permittee shall be authorized to operate this facility continuously (24 hours per day, every day of the year) up to the following operating rates (12-month rolling totals):

[OAC 252:100-8-6(a)]

A. 87,100,000 lbs/yr plastic raw materials.
B. 2,141,000 kW-hr/yr electric power supplied to the ozone generators.
C. Total ink and solvent usage on the printing lines: 303,650 gallons per year.

3. The fuel-burning equipment shall be fired with pipeline grade natural gas. Compliance can be shown by the following methods: for pipeline grade natural gas, a current gas company bill; for other gaseous fuel, a current lab analysis, stain-tube analysis, gas contract, tariff sheet, or other approved methods. Compliance shall be demonstrated at least once every 12 months.

[OAC 252:100-31]
4. The following records shall be maintained on-site. All such records shall be made available to regulatory personnel upon request. These records shall be maintained for a period of at least five years after the time they are made. [OAC 252:100-43]

   A. Pyrolysis unit secondary chamber temperatures (daily when operated).
   B. Pyrolysis unit hours of operation (monthly).
   C. Film production (monthly and 12-month rolling totals).
   D. Electric power usage in the ozone generators (monthly and 12-month rolling totals).
   E. Usage of each solvent and ink (monthly and 12-month rolling totals).
   F. MSDS information for each product used as an ink or solvent.
   G. Amounts of solvent/ink recovered for disposal.
   H. Inspection and maintenance of ozone destructors (monthly).
   I. Flame zone temperatures of each RTO or equivalent device (at least every 15-minutes when processing emissions).
   J. Solvent tank capacities, contents, vapor pressures, and throughputs (monthly).
   K. For the fuel(s) burned, the appropriate document(s) as described in Specific Condition No. 3.

5. No later than 30 days after each anniversary date of the issuance of the initial Title V operating permit (January 3, 2008), the permittee shall submit to Air Quality Division of DEQ, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit. [OAC 252:100-8-6 (c)(5)(A) & (D)]

6. The following operational monitoring specifications shall be conducted on each RTO: [40 CFR Part 64]

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Thermal Oxidizer No. 1 and 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Indicator</td>
<td>Operating temperature</td>
</tr>
<tr>
<td>Measurement Approach</td>
<td>Temperature shall be monitored using a Type K thermocouple or equivalent</td>
</tr>
<tr>
<td>Indicator Range</td>
<td>An excursion is defined as a 1-hour average temperature below 1,600°F when the unit is processing VOC emissions. Excursions trigger an inspection, corrective actions, and a reporting requirement.</td>
</tr>
<tr>
<td>Data Representativeness</td>
<td>The thermocouples monitor the operating temperature downstream combustion zone of the thermal oxidizers.</td>
</tr>
<tr>
<td>Performance Criteria</td>
<td>Accuracy ± 3%; annual calibration or replacement of thermocouples</td>
</tr>
<tr>
<td>QA/QC Practices and Criteria</td>
<td>Temperature is monitored at least once every 15 minutes</td>
</tr>
<tr>
<td>Monitoring Frequency</td>
<td>Data are recorded by computer and 1-hour averages are displayed</td>
</tr>
<tr>
<td>Data Collection Procedure</td>
<td>1-hour</td>
</tr>
</tbody>
</table>

7. This permit supersedes all previous Air Quality operating permits, which are now null and void.
Mr. Scott Wagoner  
Plant Manager  
Pliant Corporation  
P O Box 1810  
McAlester, OK 74502

SUBJECT: Permit No. 2012-776-TVR  
Plastic Film Manufacturing Operation  
McAlester, Oklahoma

Dear Mr. Wagoner:

Enclosed is the permit authorizing operation of the referenced facility. Please note that this permit is issued subject to standard and specific conditions, which are attached. These conditions must be carefully followed since they define the limits of the permit and will be confirmed by periodic inspections.

Also note that you are required to annually submit an emissions inventory for this facility. An emissions inventory must be completed on approved AQD forms and submitted (hardcopy or electronically) by April 1st of every year. Any questions concerning the form or submittal process should be referred to the Emissions Inventory Staff at 405-702-4100.

If we may be of further service, or if you have any questions about this permit, please contact our office at (405) 702-4100.

Sincerely,

David S. Schutz, P.E.  
New Source Permit Section  
AIR QUALITY DIVISION

Enclosures
The Pliant Corporation,

having complied with the requirements of the law, is hereby granted permission to operate a plastic film plant located in Section 10-T5N-R14E, near McAlester in Pittsburg County, Oklahoma, subject to standard conditions dated July 21, 2009, and specific conditions, both attached.

This permit shall expire five (5) years from the issuance date below, except as authorized under Section VIII of the Standard Conditions.

________________________________________  __________________________
Division Director                                  Date

Air Quality Division

DEQ Form #100-890                                  Revised 10/20/06
MAJOR SOURCE AIR QUALITY PERMIT
STANDARD CONDITIONS
(July 21, 2009)

SECTION I. DUTY TO COMPLY

A. This is a permit to operate / construct this specific facility in accordance with the federal Clean Air Act (42 U.S.C. 7401, et al.) and under the authority of the Oklahoma Clean Air Act and the rules promulgated there under. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

B. The issuing Authority for the permit is the Air Quality Division (AQD) of the Oklahoma Department of Environmental Quality (DEQ). The permit does not relieve the holder of the obligation to comply with other applicable federal, state, or local statutes, regulations, rules, or ordinances. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

C. The permittee shall comply with all conditions of this permit. Any permit noncompliance shall constitute a violation of the Oklahoma Clean Air Act and shall be grounds for enforcement action, permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application. All terms and conditions are enforceable by the DEQ, by the Environmental Protection Agency (EPA), and by citizens under section 304 of the Federal Clean Air Act (excluding state-only requirements). This permit is valid for operations only at the specific location listed. [40 C.F.R. §70.6(b), OAC 252:100-8-1.3 and OAC 252:100-8-6(a)(7)(A) and (b)(1)]

D. 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 paragraph 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. [OAC 252:100-8-6(a)(7)(B)]

SECTION II. REPORTING OF DEVIATIONS FROM PERMIT TERMS

A. Any exceedance resulting from an emergency and/or posing an imminent and substantial danger to public health, safety, or the environment shall be reported in accordance with Section XIV (Emergencies). [OAC 252:100-8-6(a)(3)(C)(iii)(I) & (II)]

B. Deviations that result in emissions exceeding those allowed in this permit shall be reported consistent with the requirements of OAC 252:100-9, Excess Emission Reporting Requirements. [OAC 252:100-8-6(a)(3)(C)(iv)]

C. Every written report submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F. [OAC 252:100-8-6(a)(3)(C)(iv)]
SECTION III. MONITORING, TESTING, RECORDKEEPING & REPORTING

A. The permittee shall keep records as specified in this permit. These records, including monitoring data and necessary support information, shall be retained on-site or at a nearby field office for a period of at least five years from the date of the monitoring sample, measurement, report, or application, and shall be made available for inspection by regulatory personnel upon request. Support information includes all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Where appropriate, the permit may specify that records may be maintained in computerized form.

[B. Records of required monitoring shall include:
(1) the date, place and time of sampling or measurement;
(2) the date or dates analyses were performed;
(3) the company or entity which performed the analyses;
(4) the analytical techniques or methods used;
(5) the results of such analyses; and
(6) the operating conditions existing at the time of sampling or measurement.

C. No later than 30 days after each six (6) month period, after the date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to AQD a report of the results of any required monitoring. All instances of deviations from permit requirements since the previous report shall be clearly identified in the report. Submission of these periodic reports will satisfy any reporting requirement of Paragraph E below that is duplicative of the periodic reports, if so noted on the submitted report.

D. If any testing shows emissions in excess of limitations specified in this permit, the owner or operator shall comply with the provisions of Section II (Reporting Of Deviations From Permit Terms) of these standard conditions.

E. In addition to any monitoring, recordkeeping or reporting requirement specified in this permit, monitoring and reporting may be required under the provisions of OAC 252:100-43, Testing, Monitoring, and Recordkeeping, or as required by any provision of the Federal Clean Air Act or Oklahoma Clean Air Act.

F. Any Annual Certification of Compliance, Semi Annual Monitoring and Deviation Report, Excess Emission Report, and Annual Emission Inventory submitted in accordance with this permit shall be certified by a responsible official. This certification shall be signed by a responsible official, and shall contain the following language: “I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.”
G. Any owner or operator subject to the provisions of New Source Performance Standards ("NSPS") under 40 CFR Part 60 or National Emission Standards for Hazardous Air Pollutants ("NESHAPs") under 40 CFR Parts 61 and 63 shall maintain a file of all measurements and other information required by the applicable general provisions and subpart(s). These records shall be maintained in a permanent file suitable for inspection, shall be retained for a period of at least five years as required by Paragraph A of this Section, and shall include records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of an affected facility, any malfunction of the air pollution control equipment; and any periods during which a continuous monitoring system or monitoring device is inoperative.

[40 C.F.R. §§60.7 and 63.10, 40 CFR Parts 61, Subpart A, and OAC 252:100, Appendix Q]

H. The permittee of a facility that is operating subject to a schedule of compliance shall submit to the DEQ a progress report at least semi-annually. The progress reports shall contain dates for achieving the activities, milestones or compliance required in the schedule of compliance and the dates when such activities, milestones or compliance was achieved. The progress reports shall also contain an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

[OAC 252:100-8-6(c)(4)]

I. All testing must be conducted under the direction of qualified personnel by methods approved by the Division Director. All tests shall be made and the results calculated in accordance with standard test procedures. The use of alternative test procedures must be approved by EPA. When a portable analyzer is used to measure emissions it shall be setup, calibrated, and operated in accordance with the manufacturer’s instructions and in accordance with a protocol meeting the requirements of the “AQD Portable Analyzer Guidance” document or an equivalent method approved by Air Quality.

[OAC 252:100-8(a)(3)(A)(iv), and OAC 252:100-43]

J. The reporting of total particulate matter emissions as required in Part 7 of OAC 252:100-8 (Permits for Part 70 Sources), OAC 252:100-19 (Control of Emission of Particulate Matter), and OAC 252:100-5 (Emission Inventory), shall be conducted in accordance with applicable testing or calculation procedures, modified to include back-half condensables, for the concentration of particulate matter less than 10 microns in diameter (PM$_{10}$). NSPS may allow reporting of only particulate matter emissions caught in the filter (obtained using Reference Method 5).

K. The permittee shall submit to the AQD a copy of all reports submitted to the EPA as required by 40 C.F.R. Part 60, 61, and 63, for all equipment constructed or operated under this permit subject to such standards.

[OAC 252:100-8-6(c)(1) and OAC 252:100, Appendix Q]

SECTION IV. COMPLIANCE CERTIFICATIONS

A. No later than 30 days after each anniversary date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to the AQD, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit and of any other applicable requirements which have become effective since the issuance of this permit.

[OAC 252:100-8-6(c)(5)(A), and (D)]
B. The compliance certification shall describe the operating permit term or condition that is the basis of the certification; the current compliance status; whether compliance was continuous or intermittent; the methods used for determining compliance, currently and over the reporting period. The compliance certification shall also include such other facts as the permitting authority may require to determine the compliance status of the source.

 [OAC 252:100-8-6(c)(5)(C)(i)-(v)]

C. The compliance certification shall contain a certification by a responsible official as to the results of the required monitoring. This certification shall be signed by a responsible official, and shall contain the following language: “I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.”

 [OAC 252:100-8-5(f) and OAC 252:100-8-6(c)(1)]

D. Any facility reporting noncompliance shall submit a schedule of compliance for emissions units or stationary sources that are not in compliance with all applicable requirements. This schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the emissions unit or stationary source is in noncompliance. This compliance schedule shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the emissions unit or stationary source is subject. Any such schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based, except that a compliance plan shall not be required for any noncompliance condition which is corrected within 24 hours of discovery.

 [OAC 252:100-8-5(e)(8)(B) and OAC 252:100-8-6(c)(3)]

SECTION V. REQUIREMENTS THAT BECOME APPLICABLE DURING THE PERMIT TERM

The permittee shall comply with any additional requirements that become effective during the permit term and that are applicable to the facility. Compliance with all new requirements shall be certified in the next annual certification.

 [OAC 252:100-8-6(c)(6)]

SECTION VI. PERMIT SHIELD

A. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC 252:100-8) shall be deemed compliance with the applicable requirements identified and included in this permit.

 [OAC 252:100-8-6(d)(1)]

B. Those requirements that are applicable are listed in the Standard Conditions and the Specific Conditions of this permit. Those requirements that the applicant requested be determined as not applicable are summarized in the Specific Conditions of this permit.

 [OAC 252:100-8-6(d)(2)]
SECTION VII. ANNUAL EMISSIONS INVENTORY & FEE PAYMENT

The permittee shall file with the AQD an annual emission inventory and shall pay annual fees based on emissions inventories. The methods used to calculate emissions for inventory purposes shall be based on the best available information accepted by AQD.

[OAC 252:100-5-2.1, OAC 252:100-5-2.2, and OAC 252:100-8-6(a)(8)]

SECTION VIII. TERM OF PERMIT

A. Unless specified otherwise, the term of an operating permit shall be five years from the date of issuance. [OAC 252:100-8-6(a)(2)(A)]

B. A source’s right to operate shall terminate upon the expiration of its permit unless a timely and complete renewal application has been submitted at least 180 days before the date of expiration. [OAC 252:100-8-7.1(d)(1)]

C. A duly issued construction permit or authorization to construct or modify will terminate and become null and void (unless extended as provided in OAC 252:100-8-1.4(b)) if the construction is not commenced within 18 months after the date the permit or authorization was issued, or if work is suspended for more than 18 months after it is commenced. [OAC 252:100-8-1.4(a)]

D. The recipient of a construction permit shall apply for a permit to operate (or modified operating permit) within 180 days following the first day of operation. [OAC 252:100-8-4(b)(5)]

SECTION IX. SEVERABILITY

The provisions of this permit are severable and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [OAC 252:100-8-6(a)(6)]

SECTION X. PROPERTY RIGHTS

A. This permit does not convey any property rights of any sort, or any exclusive privilege. [OAC 252:100-8-6(a)(7)(D)]

B. This permit shall not be considered in any manner affecting the title of the premises upon which the equipment is located and does not release the permittee from any liability for damage to persons or property caused by or resulting from the maintenance or operation of the equipment for which the permit is issued. [OAC 252:100-8-6(c)(6)]
SECTION XI. DUTY TO PROVIDE INFORMATION

A. The permittee shall furnish to the DEQ, upon receipt of a written request and within sixty (60) days of the request unless the DEQ specifies another time period, any information that the DEQ may request to determine whether cause exists for modifying, reopening, revoking, reissuing, terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit.

[B] [OAC 252:100-8-6(a)(7)(E)]

B. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 27A O.S. § 2-5-105(18). Confidential information shall be clearly labeled as such and shall be separable from the main body of the document such as in an attachment.

[OAC 252:100-8-6(a)(7)(E)]

C. Notification to the AQD of the sale or transfer of ownership of this facility is required and shall be made in writing within thirty (30) days after such sale or transfer.

[Oklahoma Clean Air Act, 27A O.S. § 2-5-112(G)]

SECTION XII. REOPENING, MODIFICATION & REVOCATION

A. The permit may be modified, revoked, reopened and reissued, or terminated for cause. Except as provided for minor permit modifications, the filing of a request by the permittee for a permit modification, revocation and reissuance, termination, notification of planned changes, or anticipated noncompliance does not stay any permit condition.

[OAC 252:100-8-6(a)(7)(C) and OAC 252:100-8-7.2(b)]

B. The DEQ will reopen and revise or revoke this permit prior to the expiration date in the following circumstances:

[OAC 252:100-8-7.3 and OAC 252:100-8-7.4(a)(2)]

1. Additional requirements under the Clean Air Act become applicable to a major source category three or more years prior to the expiration date of this permit. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit.

2. The DEQ or the EPA determines that this permit contains a material mistake or that the permit must be revised or revoked to assure compliance with the applicable requirements.

3. The DEQ or the EPA determines that inaccurate information was used in establishing the emission standards, limitations, or other conditions of this permit. The DEQ may revoke and not reissue this permit if it determines that the permittee has submitted false or misleading information to the DEQ.

4. DEQ determines that the permit should be amended under the discretionary reopening provisions of OAC 252:100-8-7.3(b).

C. The permit may be reopened for cause by EPA, pursuant to the provisions of OAC 100-8-7.3(d).
D. The permittee shall notify AQD before making changes other than those described in Section XVIII (Operational Flexibility), those qualifying for administrative permit amendments, or those defined as an Insignificant Activity (Section XVI) or Trivial Activity (Section XVII). The notification should include any changes which may alter the status of a “grandfathered source,” as defined under AQD rules. Such changes may require a permit modification.

    [OAC 252:100-8-7.2(b) and OAC 252:100-5-1.1]

E. Activities that will result in air emissions that exceed the trivial/insignificant levels and that are not specifically approved by this permit are prohibited.

    [OAC 252:100-8-6(c)(6)]

SECTION XIII. INSPECTION & ENTRY

A. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized regulatory officials to perform the following (subject to the permittee's right to seek confidential treatment pursuant to 27A O.S. Supp. 1998, § 2-5-105(18) for confidential information submitted to or obtained by the DEQ under this section):

1. enter upon the permittee's premises during reasonable/normal working hours where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
2. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
3. inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
4. as authorized by the Oklahoma Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit.

    [OAC 252:100-8-6(c)(2)]

SECTION XIV. EMERGENCIES

A. Any exceedance resulting from an emergency shall be reported to AQD promptly but no later than 4:30 p.m. on the next working day after the permittee first becomes aware of the exceedance. This notice shall contain a description of the emergency, the probable cause of the exceedance, any steps taken to mitigate emissions, and corrective actions taken.

    [OAC 252:100-8-6 (a)(3)(C)(iii)(I) and (IV)]

B. Any exceedance that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to AQD as soon as practicable; but under no circumstance shall notification be more than 24 hours after the exceedance.

    [OAC 252:100-8-6(a)(3)(C)(iii)(II)]

C. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.

    [OAC 252:100-8-2]
D. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that: \[OAC \text{ 252:100-8-6 (e)(2)}\]

(1) an emergency occurred and the permittee can identify the cause or causes of the emergency;
(2) the permitted facility was at the time being properly operated;
(3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.

E. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. \[OAC \text{ 252:100-8-6(e)(3)}\]

F. Every written report or document submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F. \[OAC \text{ 252:100-8-6(a)(3)(C)(iv)}\]

SECTION XV. RISK MANAGEMENT PLAN

The permittee, if subject to the provision of Section 112(r) of the Clean Air Act, shall develop and register with the appropriate agency a risk management plan by June 20, 1999, or the applicable effective date. \[OAC \text{ 252:100-8-6(a)(4)}\]

SECTION XVI. INSIGNIFICANT ACTIVITIES

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate individual emissions units that are either on the list in Appendix I to OAC Title 252, Chapter 100, or whose actual calendar year emissions do not exceed any of the limits below. Any activity to which a State or Federal applicable requirement applies is not insignificant even if it meets the criteria below or is included on the insignificant activities list.

(1) 5 tons per year of any one criteria pollutant.
(2) 2 tons per year for any one hazardous air pollutant (HAP) or 5 tons per year for an aggregate of two or more HAP's, or 20 percent of any threshold less than 10 tons per year for single HAP that the EPA may establish by rule. \[OAC \text{ 252:100-8-2 and OAC 252:100, Appendix I}\]

SECTION XVII. TRIVIAL ACTIVITIES

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate any individual or combination of air emissions units that are considered inconsequential and are on the list in Appendix J. Any activity to which a State or Federal applicable requirement applies is not trivial even if included on the trivial activities list. \[OAC \text{ 252:100-8-2 and OAC 252:100, Appendix J}\]
SECTION XVIII. OPERATIONAL FLEXIBILITY

A. A facility may implement any operating scenario allowed for in its Part 70 permit without the need for any permit revision or any notification to the DEQ (unless specified otherwise in the permit). When an operating scenario is changed, the permittee shall record in a log at the facility the scenario under which it is operating.

B. The permittee may make changes within the facility that:

1. result in no net emissions increases,
2. are not modifications under any provision of Title I of the federal Clean Air Act, and
3. do not cause any hourly or annual permitted emission rate of any existing emissions unit to be exceeded;

provided that the facility provides the EPA and the DEQ with written notification as required below in advance of the proposed changes, which shall be a minimum of seven (7) days, or twenty four (24) hours for emergencies as defined in OAC 252:100-8-6 (e). The permittee, the DEQ, and the EPA shall attach each such notice to their copy of the permit. For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change. The permit shield provided by this permit does not apply to any change made pursuant to this paragraph.

SECTION XIX. OTHER APPLICABLE & STATE-ONLY REQUIREMENTS

A. The following applicable requirements and state-only requirements apply to the facility unless elsewhere covered by a more restrictive requirement:

1. Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in the Open Burning Subchapter.
2. No particulate emissions from any fuel-burning equipment with a rated heat input of 10 MMBTUH or less shall exceed 0.6 lb/MMBTU.
3. For all emissions units not subject to an opacity limit promulgated under 40 C.F.R., Part 60, NSPS, no discharge of greater than 20% opacity is allowed except for:
   (a) Short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity;
   (b) Smoke resulting from fires covered by the exceptions outlined in OAC 252:100-13-7;
   (c) An emission, where the presence of uncombined water is the only reason for failure to meet the requirements of OAC 252:100-25-3(a); or
(d) Smoke generated due to a malfunction in a facility, when the source of the fuel producing the smoke is not under the direct and immediate control of the facility and the immediate constriction of the fuel flow at the facility would produce a hazard to life and/or property.

(4) No visible fugitive dust emissions shall be discharged beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. [OAC 252:100-29]

(5) No sulfur oxide emissions from new gas-fired fuel-burning equipment shall exceed 0.2 lb/MMBTU. No existing source shall exceed the listed ambient air standards for sulfur dioxide. [OAC 252:100-31]

(6) Volatile Organic Compound (VOC) storage tanks built after December 28, 1974, and with a capacity of 400 gallons or more storing a liquid with a vapor pressure of 1.5 psia or greater under actual conditions shall be equipped with a permanent submerged fill pipe or with a vapor-recovery system. [OAC 252:100-37-15(b)]

(7) All fuel-burning equipment shall at all times be properly operated and maintained in a manner that will minimize emissions of VOCs. [OAC 252:100-37-36]

SECTION XX. STRATOSPHERIC OZONE PROTECTION

A. The permittee shall comply with the following standards for production and consumption of ozone-depleting substances: [40 CFR 82, Subpart A]

(1) Persons producing, importing, or placing an order for production or importation of certain class I and class II substances, HCFC-22, or HCFC-141b shall be subject to the requirements of §82.4;
(2) Producers, importers, exporters, purchasers, and persons who transform or destroy certain class I and class II substances, HCFC-22, or HCFC-141b are subject to the recordkeeping requirements at §82.13; and
(3) Class I substances (listed at Appendix A to Subpart A) include certain CFCs, Halons, HBFCs, carbon tetrachloride, trichloroethane (methyl chloroform), and bromomethane (Methyl Bromide). Class II substances (listed at Appendix B to Subpart A) include HCFCs.

B. If the permittee performs a service on motor (fleel) vehicles when this service involves an ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all applicable requirements. Note: The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant. [40 CFR 82, Subpart B]
C. The permittee shall comply with the following standards for recycling and emissions reduction except as provided for MVACs in Subpart B: [40 CFR 82, Subpart F]

(1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 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 § 82.158;
(3) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161;
(4) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record-keeping requirements pursuant to § 82.166;
(5) Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to § 82.158; and
(6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

SECTION XXI. TITLE V APPROVAL LANGUAGE

A. DEQ wishes to reduce the time and work associated with permit review and, wherever it is not inconsistent with Federal requirements, to provide for incorporation of requirements established through construction permitting into the Source’s Title V permit without causing redundant review. Requirements from construction permits may be incorporated into the Title V permit through the administrative amendment process set forth in OAC 252:100-8-7.2(a) only if the following procedures are followed:

(1) The construction permit goes out for a 30-day public notice and comment using the procedures set forth in 40 C.F.R. § 70.7(h)(1). This public notice shall include notice to the public that this permit is subject to EPA review, EPA objection, and petition to EPA, as provided by 40 C.F.R. § 70.8; that the requirements of the construction permit will be incorporated into the Title V permit through the administrative amendment process; that the public will not receive another opportunity to provide comments when the requirements are incorporated into the Title V permit; and that EPA review, EPA objection, and petitions to EPA will not be available to the public when requirements from the construction permit are incorporated into the Title V permit.
(2) A copy of the construction permit application is sent to EPA, as provided by 40 CFR § 70.8(a)(1).
(3) A copy of the draft construction permit is sent to any affected State, as provided by 40 C.F.R. § 70.8(b).
(4) A copy of the proposed construction permit is sent to EPA for a 45-day review period as provided by 40 C.F.R. § 70.8(a) and (c).
(5) The DEQ complies with 40 C.F.R. § 70.8(c) upon the written receipt within the 45-day comment period of any EPA objection to the construction permit. The DEQ shall not issue the permit until EPA’s objections are resolved to the satisfaction of EPA.
(6) The DEQ complies with 40 C.F.R. § 70.8(d).
(7) A copy of the final construction permit is sent to EPA as provided by 40 CFR § 70.8(a).

(8) The DEQ shall not issue the proposed construction permit until any affected State and EPA have had an opportunity to review the proposed permit, as provided by these permit conditions.

(9) Any requirements of the construction permit may be reopened for cause after incorporation into the Title V permit by the administrative amendment process, by DEQ as provided in OAC 252:100-8-7.3(a), (b), and (c), and by EPA as provided in 40 C.F.R. § 70.7(f) and (g).

(10) The DEQ shall not issue the administrative permit amendment if performance tests fail to demonstrate that the source is operating in substantial compliance with all permit requirements.

B. To the extent that these conditions are not followed, the Title V permit must go through the Title V review process.

SECTION XXII. CREDIBLE EVIDENCE

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any provision of the Oklahoma implementation plan, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

[OAC 252:100-43-6]