



State of Mississippi

AIR POLLUTION CONTROL PERMIT

Permit To Construct Air Emissions Equipment



THIS CERTIFIES

BPI Packaging LLC, BPI Coating Solutions LLC

10136 Magnolia Drive

Olive Branch, MS

Desoto County

has been granted permission to construct air emissions equipment to comply with the emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

Mississippi Environmental Quality Permit Board

Mississippi Department of Environmental Quality

Issued/Modified: MAR 02 2016

Expires:

Permit No. 0680-00015

Agency Interest # 5596

Table of Contents

Subject Item Inventory.....i

Facility Requirements.....1

General Information.....A-1

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Subject Item Inventory

Permit Number: 0680-00015

Activity ID No.: PER20150001

Subject Item Inventory:

ID	Designation	Description
EQPT1	AA-001	8.369 MMBTU/hr Natural Gas-Fired Boiler
EQPT2	AA-002	10.461 MMBTU/hr Natural Gas-Fired Boiler
EQPT3	AA-003	Natural Gas-Fired Space Heaters
EQPT4	AA-004	525 HP Diesel-Fired Emergency Firewater Pump. Installed prior to 2002. Subject to RICE MACT.
EQPT5	AA-005	150 kW Natural Gas-Fired Emergency Generator. Installed in 2015. Subject to NSPS JJJJ.
EQPT6	AA-006	Mixing Operations -- Various amounts of raw materials will be pumped to one of several mixing tanks that will range from 100 gallons to 10,000 gallons to produce different industrial and commercial products.
EQPT7	AA-007	30,000 gallon Fixed Roof Toluene Storage Tank
EQPT8	AA-008	30,000 gallon Fixed Roof Xylene Storage Tank
EQPT9	AA-009	30,000 gallon Fixed Roof Butyl Acetate Storage Tank
EQPT10	AA-010	12,000 gallon Fixed Roof Ethyl 3-Ethoxypropionate Storage Tank
EQPT11	AA-011	20,000 gallon Fixed Roof Methyl Amyl Ketone Storage Tank
EQPT12	AA-012	30,000 gallon Fixed Roof Methyl Ethyl Ketone Storage Tank
EQPT13	AA-013	30,000 gallon Fixed Roof Aromatic 100 Fluid Storage Tank
EQPT14	AA-014	20,000 gallon Fixed Roof Hexamethylene Diisocyanate Prepolymer Storage Tank
EQPT15	AA-015	20,000 gallon Fixed Roof Hexamethylene Diisocyanate Prepolymer Storage Tank
EQPT16	AA-016	20,000 gallon Fixed Roof Hexamethylene Diisocyanate Prepolymer Storage Tank
EQPT17	AA-017	20,000 gallon Fixed Roof Hexamethylene Diisocyanate Prepolymer Storage Tank
EQPT18	AA-018	20,000 gallon Fixed Roof Parachlorobenzotrifluoride Storage Tank
EQPT19	AA-019	30,000 gallon Fixed Roof Acetone Storage Tank
EQPT20	AA-020	30,000 gallon Fixed Roof Acetone Storage Tank

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Subject Item Inventory

Permit Number: 0680-00015

Activity ID No.: PER20150001

Subject Item Inventory:

ID	Designation	Description
EQPT21	AA-021	20,000 gallon Fixed Roof Methyl Isobutyl Ketone Storage Tank
EQPT22	AA-022	30,000 gallon Fixed Roof Methanol Storage Tank
EQPT23	AA-023	30,000 gallon Fixed Roof Methanol Storage Tank
EQPT24	AA-024	20,000 gallon Fixed Roof Butyl Alcohol Storage Tank
EQPT25	AA-025	30,000 gallon Fixed Roof Solvent Storage Tank
EQPT26	AA-026	30,000 gallon Fixed Roof Mineral Spirits Storage Tank
EQPT27	AA-027	20,000 gallon Fixed Roof n-Propyl Acetate Storage Tank
EQPT28	AA-028	20,000 gallon Fixed Roof PM Acetate Storage Tank
EQPT29	AA-029	20,000 gallon Fixed Roof Methylene Chloride Storage Tank
AREA1	AA-030	Fugitive Emissions from Mixing Operations: includes emissions from piping and equipment necessary for mixing operations.
AI5596	5596	Paint manufacturer

Subject Item Groups:

ID	Description	Components
GRPT2	40 CFR 63, Subpart CCCCCC Requirements	AI 5596 Paint manufacturer

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Subject Item Inventory

Permit Number: 0680-00015

Activity ID No.: PER20150001

Receiving Stream Relationships:

Subject Item	Relationship	Receiving Stream
AI 5596 Paint manufacturer	Discharges Into	Unnamed Tributary of
	Then Into	Camp Creek

KEY

ACT = Activity

AREA = Area

CONT = Control Device

IA = Insignificant Activity

MAFO = Animal Feeding Operation

RPNT = Release Point

WDPT = Withdrawal Point

AI = Agency Interest

CAFO = Concentrated Animal Feeding Operation

EQPT = Equipment

IMPD = Impoundment

PCS = PCS

TRMT = Treatment

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Facility Requirements

Permit Number: 0680-00015

Activity ID No.:PER20150001

Page 1 of 28

EQPT0000000001 (AA-001) 8.369 MMBTU/hr Natural Gas-Fired Boiler:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Fuel Combusted	Fuel Combusted: For Emission Point AA-001, the permittee shall only use natural gas as fuel. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]
L-2		For Emission Point AA-001, the maximum opacity from any point source or emissions at any time shall not exceed 40% as determined by EPA Test Method 9, 40 CFR 60, Appendix A. [11 Miss. Admin. Code Pt. 2, R. 1.3.B.]
L-3		For Emission Point AA-001, the maximum permissible emission of ash and/or particulate matter from each fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input. [11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).]
L-4		For Emission Point AA-001, the maximum discharge of sulfur oxides from each fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. [11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).]

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Facility Requirements

Permit Number: 0680-00015

Activity ID No.:PER20150001

Page 2 of 28

EQPT0000000002 (AA-002) 10.461 MMBTU/hr Natural Gas-Fired Boiler:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		For Emission Point AA-002, the permittee shall only use natural gas as fuel. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).]
L-2		For Emission Point AA-002, the maximum opacity from any point source or emissions at any time shall not exceed 40% as determined by EPA Test Method 9, 40 CFR 60, Appendix A. [11 Miss. Admin. Code Pt. 2, R. 1.3.B.]
L-3		For Emission Point AA-002, the maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations greater than 10 million BTU per hour heat input shall not exceed an emission rate as determined by the relationship $E=0.8808*I^{-0.1667}$ Where E is the emission rate in pounds per million BTU per hour heat input and I is the heat input in millions of BTU per hour. [11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).]
L-4		For Emission Point AA-002, the maximum discharge of sulfur oxides from each fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. [11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).]

Record-Keeping Requirements:

Fuel Combusted:

Condition No.	Condition
R-1	Fuel Combusted: For Emission Point AA-002, the permittee shall maintain records of the amount of natural gas combusted during each calendar month. [40 CFR 60.48c (g)(2)]

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Facility Requirements

Permit Number: 0680-00015

Activity ID No.:PER20150001

Page 3 of 28

EQPT0000000002 (AA-002) 10.461 MMBTU/hr Natural Gas-Fired Boiler:

Narrative Requirements:

Condition No.	Condition
T-1	For Emission Point AA-002, the permittee is subject to and shall comply with the applicable requirements of the New Source Performance Standards specified in 40 CFR Part 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) and in 40 CFR Part 60, Subpart A (General Provisions). [40 CFR 60.40c(a)]

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Facility Requirements

Permit Number: 0680-00015

Activity ID No.:PER20150001

Page 4 of 28

EQPT0000000003 (AA-003) Natural Gas-Fired Space Heaters:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		For Emission Point AA-003, the maximum opacity from any point source or emissions at any time shall not exceed 40% as determined by EPA Test Method 9, 40 CFR 60, Appendix A. [11 Miss. Admin. Code Pt. 2, R. 1.3.B.]
L-2		For Emission Point AA-003, the maximum permissible emission of ash and/or particulate matter from each fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input. [11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).]
L-3		For Emission Point AA-003, the maximum discharge of sulfur oxides from each fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. [11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).]

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Facility Requirements

Permit Number: 0680-00015

Activity ID No.:PER20150001

Page 5 of 28

EQPT0000000004 (AA-004) 525 HP Diesel-Fired Emergency Firewater Pump. Installed prior to 2002. Subject to RICE MACT.:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		For Emission Point AA-004, the permittee shall: (a) change oil and filter every 500 hours of operation or annually, whichever comes first, (b) inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and (c) inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. [40 CFR 63.6603(Table 2d)]
L-2		For Emission Point AA-004, the permittee shall operate and maintain the emergency stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR 63.6625(e)]
L-3		For Emission Point AA-004, the permittee shall install a non-resettable hour meter if one is not already installed. [40 CFR 63.6625(f)]
L-4		For Emission Point AA-004, the permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to the subpart apply. [40 CFR 63.6625(h)]

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Facility Requirements

Permit Number: 0680-00015

Activity ID No.:PER20150001

Page 6 of 28

EQPT0000000004 (AA-004) 525 HP Diesel-Fired Emergency Firewater Pump. Installed prior to 2002. Subject to RICE MACT.:

Limitation Requirements:

Condition No.	Parameter	Condition
L-5		<p>For Emission Point AA-004, the permittee shall operate the emergency stationary RICE in accordance with the following requirements:</p> <p>(a) There is no time limit on the use of the emergency stationary RICE in emergency situations</p> <p>(b) The emergency stationary RICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year.</p> <p>(c) The emergency stationary RICE may be operated up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing.</p> <p>Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in the conditions of this requirement, is prohibited. If the engine is not operated according to conditions (a)-(c) in this requirement, the engine will not be considered an emergency engine under the subpart and will need to meet all requirements for non-emergency engines. [40 CFR 63.6640(f)]</p>

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Facility Requirements

Permit Number: 0680-00015

Activity ID No.:PER20150001

Page 7 of 28

EQPT0000000004 (AA-004) 525 HP Diesel-Fired Emergency Firewater Pump. Installed prior to 2002. Subject to RICE MACT.:

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		<p>For Emission Point AA-004, to determine compliance with emission and operating limits, the permittee shall monitor and collect data according to the following:</p> <p>(a) Except for monitor malfunctions, associated repairs, required performance evaluations, and required quality assurance or control activities, the permittee shall monitor continuously at all times that the stationary RICE is operating. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.</p> <p>(b) The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels. The permittee must, however, use all the valid data collected during all other periods. [40 CFR 63.6635]</p>
M-2		<p>For Emission Point AA-004, the permittee shall operate and maintain the emergency stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or develop and follow their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in manner consistent with good air pollution control practice for minimizing emissions. [40 CFR 63.6655(d)]</p>

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Facility Requirements

Permit Number: 0680-00015

Activity ID No.:PER20150001

Page 8 of 28

EQPT0000000004 (AA-004) 525 HP Diesel-Fired Emergency Firewater Pump. Installed prior to 2002. Subject to RICE MACT.:

Record-Keeping Requirements:

Condition No.	Condition
R-1	For Emission Point AA-004, the permittee shall keep the following records: <ul style="list-style-type: none">(a) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment(b) Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii)(c) Records of all required maintenance performed on the air pollution control and monitoring equipment(d) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [40 CFR 63.6655(a)]
R-2	For Emission Point AA-004, the permittee shall keep records of the maintenance conducted on the emergency stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to the permittee's maintenance plan. [40 CFR 63.6655(e)]
R-3	For Emission Point AA-004, the permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the permittee shall keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response. [40 CFR 63.6655(f)]

Submittal/Action Requirements:

Condition No.	Condition
S-1	For Emission Point AA-004, the permittee shall report each instance in which the operating limit in Table 2d of the subpart was not met. These instances are deviations from the emission and operating limitations of the subpart. These deviations must be reported according to the requirements in 40 CFR 63.6550. [40 CFR 63.6640(b)]

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Facility Requirements

Permit Number: 0680-00015

Activity ID No.:PER20150001

Page 9 of 28

EQPT0000000004 (AA-004) 525 HP Diesel-Fired Emergency Firewater Pump. Installed prior to 2002. Subject to RICE MACT.:

Narrative Requirements:

Condition No.	Condition
T-1	For Emission Point AA-004, the permittee is subject to and shall comply with National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines and General Provisions (40 CFR 63, Subparts ZZZZ and A). [40 CFR 63.6585]

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Facility Requirements

Permit Number: 0680-00015

Activity ID No.:PER20150001

Page 10 of 28

EQPT0000000005 (AA-005) 150 kW Natural Gas-Fired Emergency Generator. Installed in 2015. Subject to NSPS JJJJ.:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		For Emission Point AA-005, the permittee shall comply with the emission standards in 40 CFR 60.4231(c) for their stationary SI ICE. [40 CFR 60.4233(c)]
L-2		For Emission Point AA-005, the permittee shall certify the stationary SI ICE to the certification emission standards and other requirements for new nonroad SI engines in 40 CFR part 1048. [40 CFR 60.4231(c)]
L-3		For Emission Point AA-005, the permittee shall not install an engine that does not meet the applicable requirements in 40 CFR 60.4233. [40 CFR 60.4236(c)]
L-4		For Emission Point AA-005, the permittee shall install a non-resettable hour meter. [40 CFR 60.4237(b)]

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		For Emission Point AA-005, the permittee shall operate and maintain stationary SI ICE that achieve the emission standards as required in 40 CFR 60.4233 over the entire life of the engine. [40 CFR 60.4234]
M-2		For Emission Point AA-005, the permittee shall comply by purchasing an engine certified to the emission standards in 40 CFR 60.4231(c) for the same engine class and maximum engine power. In addition, the permittee shall keep records of conducted maintenance to demonstrate compliance, but no performance testing is required. The permittee shall also meet the requirements as specified in 40 CFR part 1068, subparts A through D, as they apply. If you adjust engine settings according to and consistent with the manufacturer's instructions, the stationary SI internal combustion engine will not be considered out of compliance. [40 CFR 60.4243(a)]
M-3		For Emission Point AA-005, the permittee shall operate the emergency stationary ICE according to the requirements in the paragraphs below. In order for the engine to be considered an emergency stationary ICE, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year is prohibited. If not operating the engine according to the requirements below, the engine will not be considered an

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Facility Requirements

Permit Number: 0680-00015

Activity ID No.:PER20150001

Page 11 of 28

EQPT0000000005 (AA-005) 150 kW Natural Gas-Fired Emergency Generator. Installed in 2015. Subject to NSPS JJJJ.:

Monitoring Requirements:

Condition No.	Parameter	Condition
		emergency engine and must meet all requirements for non-emergency engines.
		(1) There is no time limit on the use of emergency stationary ICE in emergency situations.
		(2) The permittee shall operate the emergency stationary ICE for any combination of the purposes specified below for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (3) below counts as part of the 100 hours per calendar year allowed by this paragraph. (i) Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year. (ii) Emergency stationary ICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation, Capacity and Energy Emergencies, or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2. (iii) Emergency stationary ICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.
		(3) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (2). Except as provided in 40 CFR 60.4243(d)(i), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. (i) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: (A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator; (B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Facility Requirements

Permit Number: 0680-00015

Activity ID No.:PER20150001

Page 12 of 28

EQPT0000000005 (AA-005) 150 kW Natural Gas-Fired Emergency Generator. Installed in 2015. Subject to NSPS JJJJ.:

Monitoring Requirements:

Condition No.	Parameter	Condition
		(C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines. (D) The power is provided only to the facility itself or to support the local transmission and distribution system. (E) The permittee identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator. [40 CFR 60.4243(d)]
M-4		For Emission Point AA-005, the permittee may operate their engines using propane for a maximum of 100 hours per year as an alternative fuel solely during emergency operations, but must keep records of such use. If propane is used for more than 100 hours per year in an engine that is not certified to the emission standards when using propane, the permittee is required to conduct a performance test to demonstrate compliance with the emission standards of 40 CFR 60.4233. [40 CFR 60.4243(e)]

Record-Keeping Requirements:

Condition No.	Condition
R-1	For Emission Point AA-005, the permittee shall keep the following records: (1) All notifications submitted to comply with this subpart and all documentation supporting any notification. (2) Maintenance conducted on the engine. (3) Documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR parts 90, 1048, 1054, and 1060, as applicable. [40 CFR 60.4245(a)]
R-2	For Emission Point AA-005, the permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. [40 CFR 60.4245(b)]

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Facility Requirements

Permit Number: 0680-00015

Activity ID No.:PER20150001

Page 13 of 28

EQPT0000000005 (AA-005) 150 kW Natural Gas-Fired Emergency Generator. Installed in 2015. Subject to NSPS JJJJ.:

Narrative Requirements:

Condition No.	Condition
T-1	For Emission Point AA-005, the permittee is subject to and shall comply with National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines and General Provisions (40 CFR 63, Subparts ZZZZ and A). [40 CFR 63.6585]
T-2	For Emission Point AA-005, the permittee shall meet the requirements of Subpart ZZZZ by meeting the requirements of 40 CFR 60, Subpart JJJJ. No further requirements apply. [40 CFR 63.6590(c)]
T-3	For Emission Point AA-005, the permittee is subject to and shall comply with all applicable requirements of Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (40 CFR 60, Subpart JJJJ) and the General Provisions (40 CFR 60, Subpart A). [40 CFR 60.4230(a)(4)(iv)]

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Facility Requirements

Permit Number: 0680-00015

Activity ID No.:PER20150001

Page 14 of 28

AI0000005596 (5596) Paint manufacturer:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Particulate Matter	<p>Particulate Matter: The permittee shall not cause, permit, or allow the emissions of particulate matter in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship:</p> $E = 4.1p^{0.67}$ <p>where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour.</p> <p>Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond property boundary where the discharge occurs. [11 Miss. Admin. Code Pt. 2, R. 1.3.F(1)]</p>
L-2	VOC	<p>VOC: Facility-Wide Emission Limitations</p> <p>The permittee shall limit volatile organic compound (VOC) emissions to no more than 99.0 tons/year (TPY) as determined for each consecutive 12-month period. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]</p>
L-3	HAP	<p>HAP: Facility-Wide Emission Limitations</p> <p>The permittee shall limit hazardous air pollutant (HAP) emissions to no more than 9.9 tons/year (TPY) of any single HAP and no more than 24.9 TPY of total combined HAPs as determined for each consecutive 12-month period. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]</p>

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Facility Requirements

Permit Number: 0680-00015

Activity ID No.:PER20150001

Page 15 of 28

AI0000005596 (5596) Paint manufacturer:

Record-Keeping Requirements:

Condition No.	Condition
R-1	<p>Recordkeeping Requirements</p> <p>The permittee shall maintain copies of all records and reports on site for at least five (5) years and shall make them available upon request by Mississippi Department of Environmental Quality (MDEQ) personnel. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]</p>
R-2	<p>To demonstrate compliance with the facility-wide VOC and HAP limits, the permittee shall calculate and record the emissions of VOC and HAP for each calendar month and the total emissions for each consecutive 12-month period (in tons per year). All emissions sources of VOC and HAP shall be accounted for and calculated as follows:</p> <p>(A) Storage Tanks: The permittee shall use the actual monthly throughput of VOC/HAP-containing material to determine the emissions from each tank.</p> <p>(B) Fugitive Emissions from Equipment Leaks: The permittee shall use EPA's Protocol for Equipment Leak Emission Estimates (EPA-453/R-95-017) to determine fugitive emissions associated with equipment leaks. The factors used must be documented and all calculations maintained on file at the facility.</p> <p>(C) Mixing Operations: The permittee shall keep records of the actual throughput of each VOC/HAP-containing material used in the mixing operations to calculate VOC and HAP emissions based on either:</p> <p>(1) The emission factor of 20 lb/ton used in the application or</p> <p>(2) Results from actual testing performed on the mixing tank vents. For use of actual test results, the permittee shall use an EPA approved test method and submit test reports conducted during the calendar year with the annual compliance report required herein.</p> <p>(D) Fuel Burning Equipment: Monthly fuel usage and the corresponding EPA AP-42 factor shall be used to calculate VOC and HAP emissions resulting from fuel combustion. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]</p>

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Facility Requirements

Permit Number: 0680-00015

Activity ID No.:PER20150001

Page 16 of 28

AI0000005596 (5596) Paint manufacturer:

Submittal/Action Requirements:

Condition No.	Condition
S-1	General Condition: The permittee shall submit certification of construction: Due within thirty (30) days of completion of construction or installation of an approved stationary source or prior to startup, whichever is earlier. The notification shall certify that construction or installation was performed in accordance with the approved plans and specifications. In the event there is any change in construction from the previously approved plans and specifications or permit, the permittee shall promptly notify MDEQ in writing. If MDEQ determines the changes are substantial, MDEQ may require the submission of a new application to construct with "as built" plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an "as built" application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law. [11 Miss. Admin. Code Pt. 2, R. 2.5.D.]
S-2	Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun. [11 Miss. Admin.Code Pt. 2, R.2.5.C (2).]
S-3	The permittee must notify DEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more. [11 Miss. Admin.Code Pt. 2, R.2.5.C(4).]
S-4	For the entire facility, the permittee shall submit a monitoring report due annually by the 31st of January for the preceding calendar year. This report shall provide the the monthly and 12-month rolling total VOC and HAP emissions and supporting calculations. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]

Narrative Requirements:

General Condition:

Condition No.	Condition
T-1	General Condition: The stationary source shall be designed and constructed so as to operate without causing a violation of any Applicable Rules and Regulations or this permit, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards, and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries. [11 Miss. Admin.Code Pt. 2, R.2.5.A.]
T-2	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49_17_29 1.b]

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Facility Requirements

Permit Number: 0680-00015

Activity ID No.:PER20150001

Page 17 of 28

AI0000005596 (5596) Paint manufacturer:

Narrative Requirements:

Condition No.	Condition
T-3	General Condition: The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits. [Miss. Code Ann. 49_17_29]
T-4	General Condition: The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except as provided for in Regulation 11 Miss. Admin. Code Pt.2, R. 1.10 "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. [11 Miss. Admin. Code Pt. 2, R. 1.10]
T-5	General Condition: The permittee shall allow the Mississippi Environmental Quality Commission, the Mississippi Environmental Quality Permit Board, MDEQ staff and/or their authorized representatives, upon the presentation of credentials: a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring equipment or monitoring method required in this permit, and to sample any air emission. [Miss. Code Ann. 49_17_21]
T-6	General Condition: After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for good cause shown including, but not limited to, the following: a. Persistent violation of any terms or conditions of this permit; b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or c. A change in any condition that requires either a temporary or permanent reduction or elimination of previously authorized air emissions. [11 Miss. Admin.Code Pt. 2, R.2.2.C.]
T-7	General Condition: Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control. [Miss. Code Ann. 49_17_39]
Condition No.	Condition
T-8	General Condition: This permit is for air pollution control purposes only. [11 Miss. Admin.Code Pt. 2, R.2.1.D.]

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Facility Requirements

Permit Number: 0680-00015

Activity ID No.:PER20150001

Page 18 of 28

AI0000005596 (5596) Paint manufacturer:

Narrative Requirements:

Condition No.	Condition
T-9	General Condition: The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for operating without a valid permit pursuant to State Law. [11 Miss. Admin.Code Pt. 2, R.2.2.B(5).]
T-10	General Condition: It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits. [11 Miss. Admin.Code Pt. 2, R.2.1.D(6).]
T-11	General Condition: The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities. [11 Miss. Admin.Code Pt. 2, R.2.1.D(7).]
T-12	General Condition: 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, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(a).]
T-13	General Condition: The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. 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. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(b).]
T-14	General Condition: The permit does not convey any property rights of any sort, or any exclusive privilege. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(c).]
T-15	General Condition: The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or 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 or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(d).]
T-16	General Condition: This permit shall not be transferred except upon approval of the Permit Board. [11 Miss. Admin.Code Pt. 2, R.2.16.B.]
T-17	General Condition: The provisions of this permit are severable. If any provision of the permit, or the application of any provision of the permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. [11 Miss. Admin.Code Pt. 2, R.1.1.D(7).]

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Facility Requirements

Permit Number: 0680-00015

Activity ID No.:PER20150001

Page 19 of 28

AI0000005596 (5596) Paint manufacturer:

Narrative Requirements:

Condition No.	Condition
T-18	General Condition: The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance or if construction is suspended for eighteen (18) months or more. [11 Miss. Admin.Code Pt. 2, R.2.5.C(1).]
T-19	General Condition: A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee. [11 Miss. Admin.Code Pt. 2, R.2.5.D(3).]
T-20	General Condition: Except as prohibited in 11 Miss. Admin. Code Pt. 2,R. 2.5.D(7) after certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by 11 Miss. Admin. Code Pt. 2, R. 2.13.G. [11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).]
T-21	General Condition: Except as otherwise specified in 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7), the application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing. [11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).]
T-22	General Condition: Except as otherwise specified in 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7), upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate. [11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).]
T-23	General Condition: For moderate modifications that require contemporaneous enforceable emissions reductions from more than one emission point in order to net out of PSD/NSR, the applicable Title V Permit to Operate or State Permit to Operate must be modified prior to beginning operation of the modified facilities. [11 Miss. Admin.Code Pt. 2, R.2.5.D(7).]

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Facility Requirements

Permit Number: 0680-00015

Activity ID No.:PER20150001

Page 20 of 28

AI0000005596 (5596) Paint manufacturer:

Narrative Requirements:

Condition No.	Condition
T-24	<p>General Condition: Regarding compliance testing:</p> <p>(a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.</p> <p>(b) Compliance testing will be performed at the expense of the permittee.</p> <p>(c) Each emission sampling and analysis report shall include but not be limited to the following:</p> <ol style="list-style-type: none">1. detailed description of testing procedures;2. sample calculation(s);3. results; and4. comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit. [11 Miss. Admin.Code Pt. 2, R.2.6.B(3),(4)&(6).]
T-25	<p>General Condition: The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum. [11 Miss. Admin.Code Pt. 2, R.2.5.A(4).]</p>

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Facility Requirements

Permit Number: 0680-00015

Activity ID No.:PER20150001

Page 21 of 28

GRPT0000000002 40 CFR 63, Subpart CCCCCC Requirements:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		<p>The permittee shall comply with the following: These requirements apply at all times.</p> <p>(1) Add the dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel and operate a capture system that minimizes fugitive particulate emissions during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling process.</p> <p>(2) Capture particulate emissions and route them to a particulate control device during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel. This requirement does not apply to pigments and other solids that are in paste, slurry, or liquid form.</p> <p>(3) The permittee shall:</p> <p>(i) Capture particulate emissions and route them to a particulate control device during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to the grinding and milling process; or</p> <p>(ii) Add pigments and other solids that contain compounds of cadmium, chromium, lead, or nickel to the grinding and milling process only in paste, slurry, or liquid form.</p> <p>(4) The permittee shall:</p> <p>(i) Capture particulate emissions and route them to a particulate control device during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel; or</p> <p>(ii) Fully enclose the grinding and milling equipment during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel; or</p> <p>(iii) Ensure that the pigments and solids are in the solution during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel.</p> <p>(5) The visible emissions from the particulate control device exhaust must not exceed 10-percent opacity for particulate control devices that vent to the atmosphere. This requirement does not apply to particulate control devices that do not vent to the atmosphere. [40 CFR 63.11601(a)]</p>

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Facility Requirements

Permit Number: 0680-00015

Activity ID No.:PER20150001

Page 22 of 28

GRPT0000000002 40 CFR 63, Subpart CCCCCC Requirements:

Limitation Requirements:

Condition No.	Parameter	Condition
L-2		<p>The permittee shall comply with the following:</p> <p>(1) Process and storage vessels that store or process materials containing benzene or methylene chloride, except for process vessels which are mixing vessels, must be equipped with covers or lids meeting the following requirements:</p> <p>(i) The covers or lids can be of solid or flexible construction, provided they do not warp or move around during the manufacturing process.</p> <p>(ii) The covers or lids must maintain contact along at least 90-percent of the vessel rim. The 90-percent contact requirement is calculated by subtracting the length of any visible gaps from the circumference of the process vessel, and dividing this number by the circumference of the process vessel. The resulting ratio must not exceed 90-percent.</p> <p>(iii) The covers or lids must be maintained in good condition.</p> <p>(2) Mixing vessels that store or process materials containing benzene or methylene chloride must be equipped with covers that completely cover the vessel, except as necessary to allow for safe clearance of the mixer shaft.</p> <p>(3) All vessels that store or process materials containing benzene or methylene chloride must be kept covered at all times, except for quality control testing and product sampling, addition of materials, material removal, or when the vessel is empty. The vessel is empty if:</p> <p>(i) All materials containing benzene or methylene chloride have been removed that can be removed using the practices commonly employed to remove materials from that type of vessel, e.g., pouring, pumping, and aspirating; and</p> <p>(ii) No more than 2.5 centimeters (one inch) depth of residue remains on the bottom of the vessel, or no more than 3 percent by weight of the total capacity of the vessel remains in the vessel.</p> <p>(4) Leaks and spills of materials containing benzene or methylene chloride must be minimized and cleaned up as soon as practical, but no longer than 1 hour from the time of detection.</p> <p>(5) Rags or other materials that use a solvent containing benzene or methylene chloride for cleaning must be kept in a closed container. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container. [40 CFR 63.11601(b)]</p>

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Facility Requirements

Permit Number: 0680-00015

Activity ID No.:PER20150001

Page 23 of 28

GRPT0000000002 40 CFR 63, Subpart CCCCCC Requirements:

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		<p>The permittee shall demonstrate initial compliance by conducting the following inspection and monitoring activities: The permittee shall conduct an initial inspection of each particulate control device according to the requirements in paragraphs (i) through (iii) below and perform a visible emissions test according to the requirements of paragraph (iv) below. The permittee shall record the results of each inspection and test according to 40 CFR 63.11602(b) and perform corrective action where necessary. The permittee shall conduct each inspection no later than 180 days after your applicable compliance date for each control device which has been operated within 60 days following the compliance date. For a control device which has not been installed or operated within 60 days following the compliance date, the permittee shall conduct an initial inspection prior to startup of the control device.</p> <p>(i) For each wet particulate control system, the permittee shall verify the presence of water flow to the control equipment. The permittee shall also visually inspect the system ductwork and control equipment for leaks and inspect the interior of the control equipment (if applicable) for structural integrity and the condition of the control system.</p> <p>(ii) For each dry particulate control system, the permittee shall visually inspect the system ductwork and dry particulate control unit for leaks. The permittee shall also inspect the inside of each dry particulate control unit for structural integrity and condition.</p> <p>(iii) An initial inspection of the internal components of a wet or dry particulate control system is not required if there is a record that an inspection meeting the requirements of this subsection has been performed within the past 12 months and any maintenance actions have been resolved.</p> <p>(iv) For each particulate control device, the permittee shall conduct a visible emission test consisting of three 1-minute test runs using Method 203C (40 CFR part 51, appendix M). The visible emission test runs must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. If the average test results of the visible emissions test runs indicate an opacity greater than the applicable limitation in §63.11601(a), the permittee shall take corrective action and retest within 15 days. [40 CFR 63.11602(a)]</p>
M-2		<p>The permittee shall demonstrate ongoing compliance by conduction the following inspection and testing activities: Following</p>

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Facility Requirements

Permit Number: 0680-00015

Activity ID No.:PER20150001

Page 24 of 28

GRPT0000000002 40 CFR 63, Subpart CCCCCC Requirements:

Monitoring Requirements:

Condition No.	Parameter	Condition
		<p>the initial inspections, the permittee shall perform periodic inspections of each PM control device according to the requirements in paragraphs (i) or (ii) below. The permittee shall record the results of each inspection according to 40 CFR 63.11602(b) and perform corrective action where necessary. The permittee shall also conduct tests according to the requirements in paragraph (iii) below and record the results according to 40 CFR 63.11602(b).</p> <p>(i) The permittee shall inspect and maintain each wet particulate control system according to the requirements in paragraphs (A) through (C) below.</p> <p>(A) Conduct a daily inspection to verify the presence of water flow to the wet particulate control system.</p> <p>(B) Conduct weekly visual inspections of any flexible ductwork for leaks.</p> <p>(C) Conduct inspections of the rigid, stationary ductwork for leaks, and the interior of the wet control system (if applicable) to determine the structural integrity and condition of the control equipment every 12 months.</p> <p>(ii) Inspect and maintain each dry particulate control unit according to the requirements in paragraphs (A) and (B) below.</p> <p>(A) Conduct weekly visual inspections of any flexible ductwork for leaks.</p> <p>(B) Conduct inspections of the rigid, stationary ductwork for leaks, and the interior of the dry particulate control unit for structural integrity and to determine the condition of the fabric filter (if applicable) every 12 months.</p> <p>(iii) For each particulate control device, the permittee shall conduct a 5-minute visual determination of emissions from the particulate control device every 3 months using Method 22 (40 CFR part 60, appendix A-7). The visible emission test must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. If visible emissions are observed for two minutes of the required 5-minute observation period, you must conduct a Method 203C (40 CFR part 51, appendix M) test within 15 days of the time when visible emissions were observed. The Method 203C test will consist of three 1-minute test runs and must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel HAP to a process vessel or to the grinding and milling equipment. If the Method 203C test runs indicates an opacity greater than the limitation in 40 CFR 63.11601(a)(5), the permittee shall comply with the requirements in paragraphs (A) through (C) below.</p> <p>(A) Take corrective action and retest using Method 203C within 15 days. The Method 203C test will consist of three 1-minute test runs and must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. The permittee shall continue to take</p>

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Facility Requirements

Permit Number: 0680-00015

Activity ID No.:PER20150001

Page 25 of 28

GRPT0000000002 40 CFR 63, Subpart CCCCCC Requirements:

Monitoring Requirements:

Condition No.	Parameter	Condition
		corrective action and retest each 15 days until a Method 203C test indicates an opacity equal to or less than the limitation in 40 CFR 63.11601(a)(5). (B) Prepare a deviation report in accordance with 40 CFR 63.11603(b)(3) for each instance in which the Method 203C opacity results were greater than the limitation in 40 CFR 63.11601(a)(5). (C) Resume the visible determinations of emissions from the particulate control device in accordance with paragraph (iii) 3 months after the previous visible determination. [40 CFR 63.11602(b)]

Record-Keeping Requirements:

Condition No.	Condition
R-1	<p>The permittee shall maintain the records specified in the following, for five years after the date of each recorded action.</p> <p>(1) As required in 40 CFR 63.10(b)(2)(xiv), keep a copy of each notification that was submitted, and all documentation supporting any Notification of Applicability and Notification of Compliance Status that was submitted. (2) Keep a copy of each Annual Compliance Certification Report prepared.(3) Keep records of all inspections and tests as required by 40 CFR 63.11602(b).</p> <p>(4) Records must be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1).</p> <p>(5) As specified in 40 CFR 63.10(b)(1), Keep each record for 5 years following the date of each recorded action.</p> <p>(6) Keep each record onsite for at least 2 years after the date of each recorded action according to 40 CFR 63.10(b)(1). You may keep the records offsite for the remaining 3 years. [40 CFR 63.11603(c)]</p>

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Facility Requirements

Permit Number: 0680-00015

Activity ID No.:PER20150001

Page 26 of 28

GRPT0000000002 40 CFR 63, Subpart CCCCCC Requirements:

Submittal/Action Requirements:

Condition No.	Condition
S-1	<p>The permittee shall submit an initial notification of applicability required by 40 CFR 63.9(b)(2) no later than 180 days after initial start-up of the operations. The notification of applicability must include the following information:</p> <ul style="list-style-type: none">(i) The name and address of the owner or operator;(ii) The address (i.e., physical location) of the affected source; and(iii) An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date. [40 CFR 63.11603(a)(1)]
S-2	<p>The permittee shall submit a Notification of Compliance Status within 180 days after initial start-up. This Notification of Compliance Status must include the following information:</p> <ul style="list-style-type: none">(i) Your company's name and address;(ii) A statement by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification, a description of the method of compliance (i.e., compliance with management practices, installation of a wet or dry scrubber) and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart. [40 CFR 63.11603(a)(2)]

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Facility Requirements

Permit Number: 0680-00015

Activity ID No.:PER20150001

Page 27 of 28

GRPT0000000002 40 CFR 63, Subpart CCCCCC Requirements:

Submittal/Action Requirements:

Condition No.	Condition
S-3	<p>The permittee shall prepare an annual compliance certification report according to the requirements in paragraphs (1) through (3) below. This report does not need to be submitted unless a deviation from the requirements of this subpart has occurred. When a deviation from the requirements of this subpart has occurred, the annual compliance certification report must be submitted along with the deviation report.</p> <p>(1) Dates. Prepare and, if applicable, submit each annual compliance certification report according to the dates specified below:</p> <p>(i) The first annual compliance certification report must cover the first annual reporting period which begins the day of the compliance date and ends on December 31.</p> <p>(ii) Each subsequent annual compliance certification report must cover the annual reporting period from January 1 through December 31.</p> <p>(iii) Each annual compliance certification report must be prepared no later than January 31 and kept in a readily-accessible location for inspector review. If a deviation has occurred during the year, each annual compliance certification report must be submitted along with the deviation report, and postmarked no later than February 15.</p> <p>(2) General Requirements. The annual compliance certification report must contain the following information:</p> <p>(i) Company name and address;</p> <p>(ii) A statement in accordance with 40 CFR 63.9(h) of the General Provisions that is signed by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart; and</p> <p>(iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period beginning on January 1 and ending on December 31.</p> <p>(3) Deviation Report. If a deviation has occurred during the reporting period, the permittee shall include a description of deviations from the applicable requirements, the time periods during which the deviations occurred, and the corrective actions taken. This deviation report must be submitted along with your annual compliance certification report. [40 CFR 63.11603(b)]</p>

Permit To Construct Air Emissions Equipment

BPI Packaging LLC, BPI Coating Solutions LLC

Facility Requirements

Permit Number: 0680-00015

Activity ID No.:PER20150001

Page 28 of 28

GRPT0000000002 40 CFR 63, Subpart CCCCCC Requirements:

Submittal/Action Requirements:

Condition No.	Condition
S-4	<p>If you no longer process, use, or generate materials containing HAP after December 3, 2009, submit a Notification in accordance with 40 CFR 63.11599(d), which must include the following information:</p> <p>(1) Your company's name and address;</p> <p>(2) A statement by a responsible official indicating that the facility no longer processes, uses, or generates materials containing HAP, as defined in 40 CFR 63.11607, and that there are no plans to process, use or generate such materials in the future. This statement should also include the date by which the company ceased using materials containing HAP, as defined in 40 CFR 63.11607, and the responsible official's name, title, phone number, e-mail address and signature. [40 CFR 63.11603(d)]</p>

Narrative Requirements:

Condition No.	Condition
T-1	<p>The permittee is subject to and shall comply with all the applicable requirements of National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing (40 CFR 63, Subpart CCCCCC) and the General Provisions (40 CFR 63, Subpart A).</p> <p>The permittee is considered a new source and shall comply with all applicable requirements upon startup of the affected source. [40 CFR 63.11599(a), 40 CFR 63.11599(b)(2), 40 CFR 63.11600(b)]</p>

GENERAL INFORMATION

BPI Packaging LLC, BPI Coating Solutions LLC
10136 Magnolia Drive
Olive Branch, MS
Desoto County

Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
5596	BPI Packaging, LLC	Official Site Name	11/09/2015	
2803300015	BPI Packaging LLC, BPI Coating Solutions LLC	Air-AIRS AFS	10/12/2000	
MSD000287417	Sherwin Williams Company	Hazardous Waste-EPA ID	10/12/2000	04/12/2010
068000015	Sherwin Williams Company	Air-State Operating	04/23/1998	01/01/2000
MSR000811	Sherwin Williams Company	GP-Baseline	02/24/1993	11/17/1993
MS0044296	Sherwin Williams Company	Water - NPDES	04/09/1996	04/08/2001
MSP091205	Sherwin Williams Company	Water - Pretreatment	11/12/1996	01/08/2002
MS0044296	Sherwin Williams Company	Water - NPDES	06/11/2001	05/31/2006
MSP091205	Sherwin Williams Company	Water - Pretreatment	01/08/2002	11/15/2005
MS0044296	Sherwin Williams Company	Water - NPDES	11/03/2006	06/04/2010
5596	Sherwin Williams Company	Historic Site Name	02/24/1993	06/04/2010
068000015	BPI Packaging LLC, BPI Coating Solutions LLC	Air-Construction	03/02/2016	

Basin: Yazoo River Basin