

**STATE OF MISSISSIPPI
AND FEDERALLY ENFORCEABLE
AIR POLLUTION CONTROL
PERMIT**

**TO OPERATE AIR EMISSIONS EQUIPMENT AT A
SYNTHETIC MINOR SOURCE**

THIS CERTIFIES THAT

Adlam Films, LLC
62 County Road 520
Shannon, Mississippi
Lee County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), the regulations and standards adopted and promulgated thereunder, and the State Implementation Plan for operating permits for synthetic minor sources.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: December 21, 2016

Permit No.: 1540-00136

Expires: November 30, 2021

Section 1.

A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
2. This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.1.D [11 Miss. Admin.Code Pt. 2, R. 2.1.D.]
3. Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49-17-29 1.b]
4. 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 constructing or operating without a valid permit. [11 Miss. Admin. Code Pt. 2, R.2.2.B(5).]
5. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
6. 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 this 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).]
7. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)
8. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).]
9. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).)

10. 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. (Ref.: Miss. Code Ann. 49-17-29)
11. The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board 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.(Ref.: Miss. Code Ann. 49-17-21)
12. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:
 - 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 federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission [11 Miss. Admin. Code Pt. 2, R. 2.2.C.]
13. 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]
14. Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).]
15. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board. [11 Miss. Admin. Code Pt. 2, R. 2.16.B.]

16. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this 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. 2.1.D(7).]
17. The permittee shall furnish to MDEQ within a reasonable time any information MDEQ 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 MDEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to MDEQ along with a claim of confidentiality. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(15)(d).]
18. This permit does not authorize a modification as defined in Regulation 11 Miss. Admin. Code Pt. 2, "Permit Regulations for the Construction and/or Operation of Air Emission Equipment." A modification may require a Permit to Construct and a modification of this permit. Modification is defined and "Any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:
 - a. routine maintenance, repair, and replacement;
 - b. use of an alternative fuel or raw material by reason of an order under Sections 2(a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
 - c. use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
 - d. use of an alternative fuel or raw material by a stationary source which:
 - (a) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or
 - (b) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40CFR 51.66;
 - e. an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was

established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or

- f. any change in ownership of the stationary source.”

(11 Miss. Admin. Code Pt. 2, R. 2.1.D(2).

B. GENERAL OPERATIONAL CONDITIONS

1. Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee’s previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Regulation, 11 Miss. Admin. Code Pt. 2, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (11 Miss. Admin. Code Pt. 2, R.2.10.)
2. Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began. [11 Miss. Admin.Code Pt. 2, R.2.2.B(10).]
3. The permittee shall retain all required records, monitoring data, supported information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request. [11 Miss. Admin.Code Pt. 2, R.2.9.]
4. 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 11 Miss. Admin. Code Pt. 2, R. 1.10., "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants." (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)
5. Compliance Testing: Regarding compliance testing:
 - (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.
 - (b) Compliance testing will be performed at the expense of the permittee.
 - (c) Each emission sampling and analysis report shall include but not be limited to the following:

- (1) detailed description of testing procedures;
- (2) sample calculation(s);
- (3) results; and
- (4) comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B(3), (4), and (6).)

C. GENERAL SUBMITTAL REQUIREMENTS

- 6. For renewal of this permit, the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board. [11 Miss. Admin. Code Pt. 2, R. 2.8.]
- 7. Except as otherwise specified herein, the permittee shall submit a certified annual synthetic minor monitoring report by the 31st of January for preceding calendar year. This report shall address any required monitoring specified in the permit. [11 Miss. Admin. Code Pt. 2, R.2.2.B(11).]

SECTION 2
EMISSION POINT DESCRIPTION

The permittee is authorized to operate air emissions equipment, as described in the following table:

Emission Point	Description
AA-000	Manufacturer of Laminated and Printed Flexible Packaging
AA-001a	One (1) 2.5 MMBtu/hr natural gas-fired Extrusion Laminator Primer Dryer (TC-01) - Primer Dryer Section
AA-001b	One (1) 2.5 MMBtu/hr natural gas-fired Extrusion Laminator Printer Dryer (TC-01) - Primer Dryer Section
AA-002a	One (1) 2.0 MMBtu/hr natural gas-fired Water-Based Press Dryer 1 (P-15)
AA-002b	One (1) 2.0 MMBtu/hr natural gas-fired Water-Based Press Dryer 2 (P-15)

Beginning upon receipt of Certification of Construction of the Permit to Construct Issued on [ISSUANCE DATE], the permittee is authorized to operate air emissions equipment, as described in the following table:

AA-003	One (1) 2.976 MMBtu/hr natural gas-fired Regenerative Thermal Oxidizer (RTO) controlling emissions from two (2) Solvent-Based Press Dryers (AA-003a and AA-003b)
AA-003a	One (1) 1.2 MMBtu/hr natural gas-fired Solvent-Based Press Dryer 1 (P 3-5)
AA-003b	One (1) 1.2 MMBtu/hr natural gas-fired Solvent-Based Press Dryer 2 (P 3-5)

SECTION 3 EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
AA-000 <i>(Entire Facility)</i>	11 Miss Admin. Code Pt. 2, R. 2.2.B(11).	3.1	VOC	99.0 TPY
		3.2	HAP	24.90 TPY combined
				9.90 TPY individual
AA-003 <i>(RTO Control)</i>		3.3	Destruction Efficiency	>95.0%
		3.4	Temperature	Minimum Combustion Chamber Temperature
AA-003a and AA-003b <i>(Solvent-Based Press Dryers)</i>		3.5	Emissions Capture	Emissions from these units shall be routed to RTO at all times units are operating
AA-000 <i>(Facility-Wide Fuel Burning Sources)</i>	11 Miss Admin. Code Pt. 2, R. 1.4.A(1).	3.6	SO2	4.8 lbs/MMBtu
	11 Miss Admin. Code Pt. 2, R. 1.3.D(1)(a.).	3.7	PM	0.6 lbs/MMBtu
AA-000 <i>(Entire Facility)</i>	11 Miss Admin. Code Pt. 2, R. 2.2.B(11).	3.8	Opacity	<40%

- 3.1 For Emission Point AA-000 (Entire Facility), the permittee shall limit emissions of Volatile Organic Compounds (VOCs) to no more than 99.0 tons per year as determined for each consecutive twelve month period. (Ref.: 11 Miss Admin. Code Pt. 2, R. 2.2.B(11).)
- 3.2 For Emission Point AA-000 (Entire Facility), the permittee shall limit emissions of Hazardous Air Pollutants (HAPs) to no more than 9.90 tons per year for each individual HAP and 24.9 tons per year for combined HAPs, as determined for each consecutive twelve month period. (Ref.: 11 Miss Admin. Code Pt. 2, R. 2.2.B(11).)
- 3.3 For Emission Point AA-003 (Regenerative Thermal Oxidizer), the permittee shall have a minimum Destruction Efficiency equal to or greater than 95% for demonstrating compliance with the emission limitations of Condition 3.1. (Ref.: 11 Miss Admin. Code Pt. 2, R. 2.2.B(11).)
- 3.4 For Emission Point AA-003 (Regenerative Thermal Oxidizer), the permittee shall have a minimum Combustion Chamber Temperature equal to or greater than the minimum

determined during the initial performance test. (Ref.: 11 Miss Admin. Code Pt. 2, R. 2. 2.2.B(11).)

- 3.5 For Emission Points AA-003a and 003b (Solvent-Based Press Dryers), the emissions from these operations shall be routed to Emission Point AA-003 (Regenerative Thermal Oxidizer) at all times the units are operating. ((Ref.: 11 Miss Admin. Code Pt. 2, R. 2. 2.2.B(11).)
- 3.6 For Emission Point AA-000 (Facility-Wide Fuel Burning Equipment), the maximum discharge of sulfur oxides from any 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)
- 3.7 For Emission Point AA-000 (Facility-Wide Fuel Burning Equipment), the maximum permissible emission of ash and/or particulate matter from 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).)
- 3.8 For Emission Point AA-000 (Entire Facility), no person shall cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Rule 1.3.A.(1). (Ref.: 11 Miss Admin. Code Pt. 2, R. 1.3.B.)

SECTION 4 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
AA-000 (Entire Facility)	11 Miss Admin. Code Pt. 2, R. 2.2.B(11).	4.1	VOCs	Monthly Records of Quality and Quantity of VOC and HAP containing material used and Emission Rate (Emission Point Specific Limitations and Combined Emission Point Limitations as defined in Section III)
			HAPs	
AA-003 (RTO Control)		4.2	Performance Testing	Once Every Five Years Performance Testing utilizing Method 25/25A or approved Method for demonstrating compliance with the Facility-Wide Limits by Developing Operational Ranges. These Operational Ranges shall be utilized for demonstrating compliance with Monthly Recordkeeping of Emission Rate.
		4.3	Combustion Temperature	Monthly Recordkeeping of Continuously Recorded Combustion Temperature
		4.4	VOC Mass Emissions	Record Inlet and Outlet for Determining Destruction Efficiency
			Destruction Efficiency	Monthly Recordkeeping of the RTO Destruction Efficiency

4.1 For Emission Point AA-000 (Entire Facility), the permittee shall determine for each coating, adhesive, solvent or other Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) containing material used and maintain sufficient monthly records to document:

- (a) Quantity used (gal or lb)
- (b) The percentage of VOC's and HAP's by weight
- (c) The density (lbs/gal), unless material usages are measured in lbs
- (d) The permittee may utilize data supplied by the manufacturer, or analysis of VOC and HAP content by EPA Test Method 24 and/or 311, 40 CFR 60, Appendix A.
- (e) The permittee shall calculate the VOC and HAP emissions from the use of these materials each month and compare the VOC and HAP emissions to those allowed under Conditions 3.1 and 3.2. Upon Certification of Construction of Emission Points AA-003, AA-003a and AA-003b, as defined in Condition 3.3 through 3.5, the permittee shall calculate the VOC emissions from Emission Point AA-003a

and AA-003b by using the methodology of Condition 4.4 for determining the facility-wide VOC emissions.

(Ref.: 11 Miss Admin. Code Pt. 2, R. 2.2.B(11)).

- 4.2 Upon receipt of the Certification of Construction of Emission Point AA-003 (Regenerative Thermal Oxidizer), the permittee shall perform a stack test every five years utilizing Method 25/25A or an approved equivalent during the performance test for developing operational ranges to provide a reasonable assurance of compliance with Conditions 3.1 and 3.2 of the permit herein. Operational ranges shall be derived from stack test data, vendor certification, operational history, and visual inspections, the combination of which demonstrates the proper operation of the equipment in compliance and the Destruction Efficiency is maintained accordingly. At a minimum, these operational ranges shall include a minimum Combustion Chamber Temperature in relation to the Destruction Efficiency. (Ref.: 11 Miss Admin. Code Pt. 2, R. 2.2.B(11).)
- 4.3 Upon receipt of the Certification of Construction of Emission Point AA-003 (Regenerative Thermal Oxidizer), the permittee shall maintain sufficient monthly records to document continuously record the Combustion Chamber Temperature during operation of the Solvent-Based Press Operations. (Ref.: 11 Miss Admin. Code Pt. 2, R. 2.2.B(11).)
- 4.4 Upon receipt of the Certification of Construction of Emission Point AA-003 (Regenerative Thermal Oxidizer), the permittee shall maintain sufficient monthly records to document the inlet and outlet mass emissions (lb/hr) using the combustion chamber temperature at the given time for determining the Destruction Efficiency. (Ref.: 11 Miss Admin. Code Pt. 2, R. 2.2.B(11).)

SECTION 5 REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number	Pollutant/Parameter	Reporting Requirement
AA-000 (Entire Facility)	11 Miss Admin. Code Pt. 2, R. 2.2.B(11).	5.1	VOCs	Annual Reports providing Quality and Quantity of VOC's and HAP's and subsequent Emission Rate.
			HAPs	
AA-003 (RTO Control)		5.2	Performance Test Protocol	Shall be submitted within 30 days prior to scheduled test
		5.3	Performance Test Results	Submitted within 60 days of Test
		5.4	Combustion Temperature	Annual Reports providing any exceedances of the Continuously Recorded Combustion Temperature
		5.5	VOC Mass Emissions	Record Inlet and Outlet for Determining Destruction Efficiency
Destruction Efficiency	Annual Reports providing the RTO Destruction Efficiency			

5.1 For Emission Point AA-000 (Entire Facility), the permittee shall submit annual reports containing the requirements of Condition 4.1 of the permit herein:

- (a) Quantity used (gal or lb)
- (b) The percentage of VOC's and HAP's by weight
- (c) The density (lbs/gal), unless material usages are measured in lbs
- (d) The permittee may utilize data supplied by the manufacturer, or analysis of VOC content by EPA Test Method 24 and/or 311, 40 CFR 60, Appendix A.
- (e) The permittee shall calculate the VOC and HAP emissions from the use of these materials, including the use of the RTO for Emission Points AA-003a and AA-003b utilizing the VOC Destruction Efficiency, each month and compare the VOC and HAP emissions to those allowed under conditions 3.B.1 and 3.B.2 of the permit herein.
- (f) These reports shall be submitted by the 31st of January for preceding calendar year.

(Ref.: 11 Miss Admin. Code Pt. 2, R. 2.2.B(11)).

5.2 Upon receipt of the Certification of Construction of Emission Point AA-003 (Regenerative Thermal Oxidizer), the permittee shall submit a written test protocol at least thirty (30) days prior to the scheduled test date(s) to ensure that all test methods and

procedures are acceptable to MDEQ. If the permittee is proposing an alternative test method not previously approved by EPA, a cover letter indicating such must be attached and submitted with the test protocol. If the initial test protocol is acceptable, subsequent protocols may be waived if these protocols contain no significant changes. Also, MDEQ must be notified at least ten (10) days prior to the scheduled test date so that an observer may be present to witness the test(s). If any changes were made to the operational ranges for Emission Point AA-003 (Regenerative Thermal Oxidizer) during the performance test during the annual reporting period, the permittee shall submit these changes on the annual report. (Ref.: 11 Miss Admin. Code Pt. 2, R. 2.2.B(11).)

- 5.3 Upon receipt of the Certification of Construction of Emission Point AA-003 (Regenerative Thermal Oxidizer), the permittee shall submit the performance test results to MDEQ within sixty (60) days of completion of the performance test. (Ref.: 11 Miss Admin. Code Pt. 2, R. 2.2.B(11).)
- 5.4 Upon receipt of the Certification of Construction of Emission Point AA-003 (Regenerative Thermal Oxidizer), the permittee shall submit annual reports of any exceedance of Condition 4.3 (Continuously Recorded Combustion Temperature). These reports shall be submitted by the 31st of January for preceding calendar year. (Ref.: 11 Miss Admin. Code Pt. 2, R. 2.2.B(11).)
- 5.5 Upon receipt of the Certification of Construction of Emission Point AA-003 (Regenerative Thermal Oxidizer), the permittee shall submit annual reports providing the inlet and outlet mass emissions (lb/hr) during the performance test for determining the Destruction Efficiency. The permittee shall also record the Destruction Efficiency achieved utilizing the minimum Combustion Chamber Temperature. (Ref.: 11 Miss Admin. Code Pt. 2, R. 2. 2.2.B(11).)