



State of Mississippi



FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL PERMIT

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

**THIS CERTIFIES**  
General Binding Corporation  
300 Quartet Avenue  
Booneville, MS  
Prentiss 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**

**Mississippi Department of Environmental Quality**

Issued/Modified: **APR 12 2012**

Expires: **MAR 31 2017**

Permit No. 2340-00004

Agency Interest # 947

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Other Relevant Documents:

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

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Subject Item Inventory

Permit Number:2340-00004

Activity ID No.: PER20110001

### Subject Item Inventory:

ID	Designation	Description
AI947		
EQPT34	AA-002	3 Wood Dimensioning saws
EQPT35	AA-001	109 natural gas-fired HVAC Units for facility heating (total of 24.49 MMBTU/Hr)
EQPT36	AA-003	Special Products Woodshop including Wood Frame Dimensioning and Routers using manually operated tools
EQPT37	AA-004	Aluminum frame cutting saw

### KEY

ACT = Activity

AREA = Area

CONT = Control Device

IA = Insignificant Activity

RPNT = Release Point

AI = Agency Interest

CAFO = Concentrated Animal Feeding Operation

EQPT = Equipment

MAFO = Animal Feeding Operation

TRMT = Treatment

## Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

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**AI0000000947:**

### Limitation Requirements:

Condition No.	Parameter	Condition
L-1		For Emission Points AA-001, AA-002, AA-003, and AA-004, the maximum opacity from any point source of emissions at any time shall not exceed 40% as determined by EPA Test Method 9, 40 CFR 60, Appendix A. [APC-S-1 3.1(a)]

### Submittal/Action Requirements:

Condition No.	Condition
S-1	The permittee shall submit to the Office of Pollution Control, a semi-annual report summarizing the emissions and fuel usage described by this permit. The semi-annual reports shall be post-marked no later than thirty (30) days following the end of the semi-annual reporting periods ending June 30 and December 31. Any exceedance of the limitations outlined in this permit shall be reported to the MDEQ no later than ten (10) days following the end of the month in which the exceedance occurred and shall report the cause of the exceedance and action(s) taken and/or to be taken to correct it. [APC-S-2 II.B(11)(a)]
S-2	General Condition: 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. [APC-S-2 II.B(10)]
S-3	Except as otherwise specified herein, the permittee shall Submit a certified semi-annual synthetic minor monitoring report: Due semi-annually by the 28th of January and July. This report shall address any required monitoring specified in the permit. [APC-S-2 II.B(11)]

### Narrative Requirements:

Condition No.	Condition
T-1	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49-17-29 1.b]

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**AI0000000947 (continued):**

### Narrative Requirements:

Condition No.	Condition
T-2	General Condition: The permittee shall at all times maintain in good working order and operate as efficiently as possible all air pollution control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit. [APC-S-2 V.A]
T-3	General Condition: Solids removed in the course of control of air emissions shall 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 1.a(i and ii)]
T-4	General Condition: Any diversion from or bypass of collection and control facilities is prohibited except as provided for in Regulation APC-S-1, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. [APC-S-1 Section 10]
T-5	General Condition: 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. [APC-S-2 X]
T-6	General Condition: 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. [Miss. Code Ann. 49-17-21]
T-7	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 cause including, but not limited to: (a) 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 required either a temporary or permanent reduction or elimination of authorized air emissions. [APC-S-2 II.C]
T-8	General Condition: This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for this 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 condition of the permit. [APC-S-2 II.B(15)b]

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### AI0000000947 (continued):

#### Narrative Requirements:

Condition No.	Condition
T-9	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]
T-10	General Condition: The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations. [APC-S-2 II.B(15)c]
T-11	General Condition: 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. [APC-S-2 II.B(7)]
T-12	General Condition: This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board. [APC-S-2 XVI.B]
T-13	General Condition: This permit is for air pollution control purposes only. [APC-S-2 I.D(1)]
T-14	General Condition: This permit is a Federally-approved permit to operate a synthetic minor source as described in Regulation APC-S-2, Section IV.D. [APC-S-2 IV.D]
T-15	General Condition: 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. [APC-S-2 I.D(7)]
T-16	General Condition: 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. [APC-S-2 II.B(15)d]

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**AI0000000947 (continued):**

### Narrative Requirements:

Condition No.	Condition
T-17	<p>General Condition: This permit does not authorize a modification as defined in APC-S-2, "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment". Modification is defined as "Any physical change in or change in the method of operation of a facility which increases actual emissions or 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:</p> <ul style="list-style-type: none"><li>(a) routine maintenance, repair, and replacement;</li><li>(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;</li><li>(c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;</li><li>(d) use of an alternative fuel or raw material by a stationary source which: (i) 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 (ii) the source is approved to use under any permit issued under 40 CFR 52.51 or under regulations approved pursuant to 40 CFR 51.166;</li><li>(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 52.51, or under regulations approved pursuant to Subpart I or 40 CFR 51.166; or</li><li>(f) any change in ownership of the stationary source" [APC-S-2 I.D(2)]</li></ul>
T-18	<p>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 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. [APC-S-2 II.B(15)a]</p>
T-19	<p>General Condition: 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. [APC-S-2 IX]</p>
T-20	<p>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 constructing or operating without a valid permit. [APC-S-2 II.B(5)]</p>

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**AI0000000947 (continued):**

### Narrative Requirements:

Condition No.	Condition
T-21	<p>General Condition: Emergencies</p> <p>(a) Except as otherwise specified herein, 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 the 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 preventative maintenance, careless or improper operation, or operator error.</p> <p>(b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.</p> <p>(c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence as follows: (i) an emergency occurred and that the permittee can identify the cause(s) of the emergency; (ii) the permitted facility was at the time being properly operated; (iii) 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 the permit; and (iv) the permittee submitted notice of the emergency to MDEQ within two (2) working days of the time when emission limitations were exceeded due to the emergency which contained a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(d) In any enforcement proceeding, the permittee seeking to establish the occurrence of any emergency has the burden of proof.</p> <p>(e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein [APC-S-2 II.B(10)]</p>
T-22	<p>General Condition: Upsets</p> <p>(a) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows: (i) an upset occurred and that the permittee can identify the cause(s) of the upset; (ii) the source was at the time being properly operated; (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (iv) the permittee submitted notice of the upset to the DEQ within five (5) working days of the time the upset began which contained a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.</p> <p>(c) This provision is in addition to any upset provision contained in any applicable requirement. [APC-S-1 Section 10]</p>



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**AI0000000947 (continued):**

### Narrative Requirements:

Condition No.	Condition
T-23	<p>General Condition: Startups and Shutdowns</p> <p>(a) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows: (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above; (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.</p> <p>(c) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply. [APC-S-1 Section 10]</p>
T-24	<p>General Condition: Maintenance</p> <p>(a) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following: (i) the permittee can identify the need for the maintenance; (ii) the source was at the time being properly operated; (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (iv) the permittee submitted notice of the maintenance to MDEQ within five (5) working days of the time the maintenance began or such other times as allowed by MDEQ, which contained a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.</p> <p>(c) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. [APC-S-1 Section 10]</p>
T-25	<p>General Condition: 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. [APC-S-2 VIII]</p>

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### EQPT0000000034 (AA-002) 3 Wood Dimensioning saws:

#### Limitation Requirements:

Condition No.	Parameter	Condition
L-1		For Emission Point AA-002, the permittee shall operate the equipment as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]
L-2		For Emission Point AA-002, the emissions control equipment (baghouse filter) may not be bypassed at anytime when the process is operational. [APC-S-2 II.B(10)]

#### Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		For Emission Point AA-002, the permittee shall perform monthly visual inspections and/or maintenance, or more often if necessary, to ensure proper operation of pollution control equipment (baghouse filter). The permittee shall also maintain on hand at all times sufficient equipment necessary to repair and /or replace the pollution control equipment. [APC-S-2 II.B(11)(a)]

#### Record-Keeping Requirements:

Condition No.	Condition
R-1	For Emission Point AA-002, the permittee shall maintain records of inspections and/or maintenance made in log form and made available for review upon request. [APC-S-2 II.B(11)(a)]

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**EQPT0000000034 (continued):**

**Submittal/Action Requirements:**

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Condition No.	Condition
S-1	For Emission Point AA-002, the permittee shall prepare a summary report of the recordkeeping log to be submitted no later than 30 days from the semi-annual periods ending June 30 and December 31. [APC-S-2 II.B(11)(a)]

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### EQPT0000000035 (AA-001) 109 natural gas-fired HVAC Units for facility heating (total of 24.49 MMBTU/Hr):

#### Limitation Requirements:

Condition No.	Parameter	Condition
L-1		For Emission Point AA-001, the permittee shall operate equipment such that emissions of ash and/or particulate matter shall not exceed 0.6 pounds per million BTU per hour heat input from fossil fuel burning installations of less than 10 million BTU per hour heat input. [APC-S-1 III.4(a(1))]
L-2		For Emission Point AA-001, the permittee shall not exceed 4.8 pounds per million BTU heat input for fuel burning installations used primarily to produce heat or power by indirect heat transfer. [APC-S-1 4.1(a)]
L-3		For Emission Point AA-001, the permittee shall burn only natural gas for the fuel burning equipment. [APC-S-2 II.B(10)]

#### Record-Keeping Requirements:

Condition No.	Condition
R-1	For Emission Point AA-001, the permittee shall monitor and maintain monthly records on quantity, quality, and heating value (BTU/ft3) of natural gas combusted. [APC-S-2 II.B(11)(a)]

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### **EQPT0000000036 (AA-003) Special Products Woodshop including Wood Frame Dimensioning and Routing using manually operated tools:**

#### Limitation Requirements:

Condition No.	Parameter	Condition
L-1		For Emission Point AA-003, such air emissions equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [Other]

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General Binding Corporation

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EQPT0000000037 (AA-004) Aluminum frame cutting saw:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		For emission point AA-004, such emissions equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [Other]

## GENERAL INFORMATION

General Binding Corporation  
300 Quartet Avenue  
Booneville, MS  
Prentiss County

### Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
947	Quartet Manufacturing Company	Historic Site Name	4/13/1997	1/9/2001
2811700004	General Binding Corporation	Air-AIRS AFS	10/12/2000	
MSD985969682	Quartet Manufacturing Company, Booneville Plant 1	Hazardous Waste-EPA ID	8/7/1998	1/24/2001
234000004	Quartet Manufacturing Company, Booneville Plant 1	Air-Construction	4/13/1997	
234000004	Quartet Manufacturing Company, Booneville Plant 1	Air-Construction	1/6/1999	
234000004	Quartet Manufacturing Company, Booneville Plant 1	Air-Synthetic Minor Operating	11/25/1998	11/1/2003
MSR110116	Quartet Manufacturing Company, Booneville Plant 1	GP-Baseline	1/12/1994	2/1/2001
MSR000283	Quartet Manufacturing Company, Booneville Plant 1	GP-Baseline	10/27/1992	1/12/1994
MSP090937	Quartet Manufacturing Company, Booneville Plant 1	Water - Pretreatment	4/16/1997	4/10/2002
947	General Binding Corporation, Booneville Plant 1	Historic Site Name	10/27/1992	10/16/2005
MSR110116	Quartet Manufacturing Company, Booneville Plant 1	GP-Baseline	2/1/2001	1/17/2006
MSP090937	General Binding Corporation, Booneville Plant 1	Water - Pretreatment	6/19/2002	8/18/2004
MSD985969682	General Binding Corporation	Hazardous Waste-EPA ID	1/24/2001	
234000004	General Binding Corporation, Booneville Plant 1	Air-Synthetic Minor Operating	3/24/2004	7/15/2004
947	ACCO Brands Corporation	Historic Site Name	10/17/2005	11/21/2005
947	General Binding Corporation	Official Site Name	11/22/2005	
MSD985969682	ACCO Brands Corporation	Hazardous Waste-EPA ID	10/13/2005	11/22/2005
MSR110116	General Binding Corporation, Booneville Plant 1	GP-Baseline	1/17/2006	2/2/2011
234000004	General Binding Corporation	Air-Synthetic Minor Operating	7/19/2007	4/12/2012
947 001	Quartet, A GBC Company	GARD	8/13/1997	
MSR110116	General Binding Corporation	GP-Baseline	2/2/2011	9/28/2015
234000004	General Binding Corporation	Air-Synthetic Minor Operating	4/12/2012	3/31/2017

**Basin:** Tombigbee River Basin

## **GENERAL INFORMATION**

**Location Description:**PG- Plant Entrance (General). Data collected by David Lee on 07/10/2003.