



**DIVISION OF
ENVIRONMENTAL QUALITY**

Sarah Huckabee Sanders
GOVERNOR

Shane E. Khoury
SECRETARY

01/10/2024

Via Email Only to: wayne.bailey@amgreetings.com

Wayne Bailey
Environmental, Health & Safety Manager
American Greetings Corporation
1400 Olendorf Road
Osceola, AR 72370

RE: Application for Registration
AFIN: 47-00030; Registration No.: 1899-A-REG315

Dear Mr. Bailey,

The Division of Environmental Quality has reviewed your facility's application for registration for the facility located at 1400 Ohlendorf Road, Osceola in Mississippi County, Arkansas.

The Division of Environmental Quality has determined that the information certified in the application fulfills the required criteria for registration as specified in Arkansas Air Pollution Control Code (Rule 18), Rule 18.315 and other applicable regulations. Your registration number has been assigned as 1899-A-REG315. Permit 1899-AR-3 is hereby void with this registration.

This registration is your authority to construct, operate, and maintain the equipment and/or control apparatus as set forth in your registration request received on January 5, 2024. American Greetings Corporation is required to update this registration should the facility operations or emissions change so that the current registration no longer reflects actual operations.

Please maintain a copy of this letter and the application at the facility.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas Rheaume'.

Thomas Rheaume, P.E.
Senior Operations Manager, Office of Air Quality, Division of Environmental Quality
5301 Northshore Drive, North Little Rock, AR 72118-5317

c: Compliance Monitoring

Attachment: Registration Application

Air Application for Registrations, Minor Source Permits, or Title V Permits

version 1.40

(Submission #: HPZ-JP0Y-TPB0C, version 1)

Digitally signed by:
nform
DPEPORTALIIS.ADPCEDMZ.state.ar.us
Date: 2024.01.05 14:11:01 -06:00
Reason: Copy Of Record
Location: North Little Rock, Arkansas



Details

AFIN 47-00030
Submission ID HPZ-JP0Y-TPB0C
Submission Reason Notification

Form Input

General Information

AFIN, Application Type, Current Registrations or Air Permits, and Changes

Indicate below the Arkansas DEQ Facility Identification Number (AFIN) if one has already been assigned; if this application is for a Registration, Minor Source air permit, or a Title V/Major Source air permit; the type of application; list any active registration or air permit numbers; and clearly and concisely indicate the changes associated with this application.

Specifically identify all changes requested in this application in the paragraph box below. Identify any physical modifications, including increases in the amount or type of throughputs, fuel use, control equipment, or other factors affecting emissions. Also, specifically identify any other requested changes to the permit or permit conditions, including but not limited to recordkeeping requirements, testing, monitoring, etc. Because of the complexity of permits, any changes not listed in the paragraph box below may not be reviewed or incorporated into the draft permit.

Arkansas DEQ Facility Identification Number (AFIN)
47-00030

Select the Type of Permit
Registration

Select the Type of Registration Application
Initial (New) Registration (Includes changes from Minor, Title V, and General Permit types)

List All Changes and Revised Sources Associated with this Application or Indicate "None"

American Greetings Corporation (AGC) requests that the current minor source permit for the AGC Osceola facility (1899-AR-3) be replaced by a Registration. Recent changes at the Osceola facility have reduced actual facility-wide emissions below the thresholds requiring a Minor Source permit. The only 40 CFR Part 60 and Part 63 regulations which apply to emission units at the facility are Part 60, Subpart IIII and Part 63, Subparts ZZZZ and CCCCCC (Regulation 18.301(B)(3))

AGC removed the etching process in 2022. This removal eliminated the use of hydrochloric acid, nitric acid, and ferric chloride to support the plate etching process.

The screen-printing production line has not been in production since December 2021, but has not been removed. All the Glycol Ether emissions came from the screen-printing process. Elimination of the screen printing process also eliminated PM emissions related to chemicals that contained glycol ethers. Since the screen-printing equipment has not been removed and could be restarted, for the purposes of this application, it has been assumed that glycol ether and PM emissions from screen-printing will be the maximum level they were in 2021.)

AGC estimates facility-wide actual emissions to be:

PM < 25 TPY
PM10 < 15 TPY
SO2 < 40 TPY
VOC < 40 TPY
CO < 75 TPY
NOX < 40 TPY
Total HAP < 5 TPY
Single HAP < 2 TPY
Glycol Ethers 0.6 TPY

The bases for these estimates are as follows:

SO2, NOX, and CO -- Current permit limits for fuel combustion sources.

PM, PM10, VOC, Total HAP, and Single HAP -- Current permit limits for fuel combustion sources and emission calculations for SN-01 (Plantwide) based on material usage.

Glycol Ethers -- Based on 2021 records (the last full year of screen-printing operation).

Note: Actual emissions for the past 12 months for SN-01 are:

PM 0.0 TPY
VOC 4.1 TPY
Total HAP 0.4 TPY
Highest Single HAP 0.1 TPY (Hexane)
Glycol Esters 0.0 TPY

Detailed emission calculation records are available upon request.

List Current Active Registration or Air Permit Number for the Facility (If Applicable)

1899-AR-3

Dates of Construction/Reconstruction

If the facility is a new facility or the modifications to the facility involve construction of new emission units or reconstruction, enter the proposed construction or reconstruction and operation dates. If a modification does not involve construction of new emission units or reconstruction, do not enter any dates. [Note: Except for Registrations, permits are generally required before any construction may commence. Contact the Office of Air Quality for more information and exceptions.]

Expected Date of Commencement of Construction or Reconstruction

NONE PROVIDED

Expected Date of Completion of Construction or Reconstruction

NONE PROVIDED

Expected Date of Operation

NONE PROVIDED

Air Application Contact Information

In many cases, the person who prepared and is most knowledgeable about the application is someone other than the facility mailing contact. The air application contact's email will be copied on correspondence sent to the facility regarding this submission. This contact will only be used for this ePortal submission. If this section is blank and the Office of Air Quality requires

additional information, we will contact the person listed as the facility mailing address contact.

Air Application Contact Information

Air Application Contact

Prefix

Mr.

First Name

Wayne

Last Name

Bailey

Title

Environmental, Health and Safety Manager

Organization Name

American Greetings

Phone Type

Mobile

Number

8702279388

Extension**Email**

wayne.bailey@amgreetings.com

Fax

NONE PROVIDED

Air Application Contact Address

1400 Ohlendorf Rd.

Osceola, AR 72370

United States

Federal Regulations Applicability

Indicate the applicability of the listed federal regulations.

Are there any 40 C.F.R. 60, 61, or 63 federal regulations that are applicable to this application?

No

Applicant Information

Facility Information

Please provide the following information about the facility.

Legal Name - Facility Name

American Greetings Corporation

North American Industry Classification System (NAICS)

Please provide the NAICS codes and descriptions for your facility.

[Click here to search for and review the NAICS Codes via the Census Bureau NAICS Lookup](#)

Primary NAICS Code and Description

32311 - Printing

Secondary NAICS Code and Description

n/a

Tertiary NAICS Code and Description

n/a

Facility Physical Address

Physical Address

1400 Ohlendorf Rd.

Osceola, AR 72370

Facility Physical County
Mississippi

Facility Physical Location Latitude and Longitude
35.689742,-89.973165

Facility Mailing Address

Mailing Contact

Prefix

Mr.

First Name

Wayne

Last Name

Bailey

Title

Environmental, Health & Safety Manager

Organization Name

American Greetings

Phone Type

Business

Number

8702279388

Extension

Email

wayne.bailey@amgreetings.com

Fax

NONE PROVIDED

Mailing Address

1400 Ohlendorf Rd.

Osceola, AR 72370

United States

Additional Facility Email Contact

If you want an additional facility contact to be included on emails of correspondence for this facility, please enter their email address below. This contact should be facility personnel only.

Enter the Additional Facility Email Contact

wayne.bailey@amgreetings.com

Billing Information

Please provide the following information for the Billing contact for this application.

Billing Information

Billing Contact

Prefix

Mr.

First Name

Wayne

Last Name

Bailey

Title

Environmental, Health & Safety Manager

Organization Name

American Greetings

Phone Type

Mobile

Number

8702279388

Extension**Email**

wayne.bailey@amgreetings.com

Fax

NONE PROVIDED

Billing Address

1400 Ohlendorf Rd.

Osceola, AR 72370

United States

Organizational Information

Please provide the following information for the applicant. If the applicant is a Corporation, Limited Liability Company, Limited Partnership, or Cooperative; your legal name must exactly match the name registered with the Arkansas Secretary of State. Please use the following link to reference the Secretary of State registered name listing. The Secretary of State information is not required for Administrative Amendments.

All Corporations, Limited Liability Companies (LLC), Limited Partnerships (LP, LLP, and LLLP), and Cooperatives must be registered and in good standing with the Arkansas Secretary of State and the state of origin (if other than Arkansas).

[Click here to view the Secretary of State registered name listing.](#)

Legal Organization

Corporation (Domestic or Foreign, includes for-profit, nonprofit, and corporation d/b/a company)

Enter the Arkansas Secretary of State's Filing Number

100057015

Indicate if the Applicant is chartered in Arkansas (i.e. domestic) or chartered in a state other than Arkansas (i.e. foreign). Refer to the State of Origin that is listed on the Arkansas Secretary of State's website for this applicant.

Foreign (Chartered Outside of Arkansas)

Attach the Current Proof of Good Standing from the State of Origin

[American Greetings Corporation - OH Certificate of Good Standing \(Oct. 2023\).pdf - 12/08/2023 02:25 PM](#)

Comment

NONE PROVIDED

Disclosure Statement or Securities and Exchange Commission (SEC) Reports (Required for Registrations, Initial Permits, and Renewals)

Arkansas Code Annotated ♦ 8-1-106 requires that all applicants for the issuance or transfer of any permit submit a disclosure statement with their applications. Some exceptions apply (refer to the form for details).

The disclosure form is a separate form and can be obtained using the link below.

[Click Here for the DEQ Disclosure Statement Form](#)

Attach the Disclosure Statement or SEC Annual and Quarterly Reports

[Disclosure Statement ARDEQ 11.23.pdf - 12/08/2023 02:27 PM](#)

Comment

NONE PROVIDED

Responsible Official Information

Provide the information below for the person under whose electronic signature or hardcopy signature this form will be certified when completed. This person must be a responsible official. For the definition of responsible official click the link below.

[Click Here for the Definition of Responsible Official](#)

Responsible Official

First Name

Shannon

Last Name

Sullivan

Title

VP Distribution

Company or Agency of the Responsible Official

American Greetings

How Does the Person Certifying this Submission Qualify as a Responsible Official?

The person is the vice-president of the corporation, LLC, or cooperative in charge of a principle business function

How Will the Responsible Official Certify this Submission?

The Responsible Official will submit this submission using their electronic signature

Registration Information

Total Actual Emissions (Required for Registrations)

Enter the total actual emissions from the facility.

PM (tons per year)

0.2

PM10 (tons per year)

0.2

SO2 (tons per year)

0.2

VOC (tons per year)

19.8

CO (tons per year)

0.7

NOx (tons per year)

3.3

Lead (tons per year)

0.0

Single Hazardous Air Pollutant (tons per year)

1.2

Total Hazardous Air Pollutants (tons per year)

4.2

Air Contaminants (tons per year)

29.0

Process Information

Process Description (Required for All Applications Except Administrative Amendments)

A written description of the process by NAICS number must accompany each application. This must include a description of each relevant piece of equipment and process. The description must be in sufficient detail to provide the permit engineer an understanding of the process. The applicant should place special emphasis on any process or equipment with the potential to emit any pollutants to the atmosphere. The process description should describe material flow between processes (if any) and the source (SN) to which each process is vented should be identified in the narrative. The applicant should describe any work practice standards used to control emissions. Attach the process description below.

Attach the Process Description

[Process Flow 2023.docx - 12/08/2023 02:36 PM](#)

[Summary of Permit Activity 1.5.24.docx - 01/05/2024 08:48 AM](#)

Comment

NONE PROVIDED

Process Flow Diagram (Required for All Applications Except Administrative Amendments)

The process flow diagram must be in sufficient detail to understand the general process. The process flow diagram must clearly identify all relevant processes or pieces of equipment. All points where raw materials and/or chemicals are introduced into the process and all points where intermediate and/or finished products are removed from the process must be clearly identified with quantities of materials shown. The process flow diagram should show material flow between processes (if any) and the applicant should identify the source number (SN) on the diagram. Attach the process flow diagram below.

Attach the Process Flow Diagram

[Process Flow 2023.docx - 12/08/2023 02:37 PM](#)

Comment

NONE PROVIDED

Emission Information

Emission Calculations (Required for All Applications Except Administrative Amendments if No Changes to Emissions)

Provide detailed calculations for the emissions of the pollutants. The calculations must contain a detailed explanation of the source of the emission estimation. Please retain all sources in the emission calculations. While calculations are required for revised sources, calculations for all sources at the facility are preferred. Any calculations included in a spreadsheet format must also include a detailed sample calculation. Unless this is an Administrative Amendment that does not involve changes to emissions, attach the emission calculations below.

Additional instructions for the emission calculations may be found at the following link.

[Click Here for More Instructions for the Emission Calculations](#)

Attach the Emission Calculations

[Emission Calculation .pdf - 12/08/2023 02:49 PM](#)

Comment

NONE PROVIDED

Equipment Forms

Equipment Specifications (Required for All Applications Except Modifications that Do Not Involve New Construction or Do Not Change the Manner in which the Current Process Operates and Administrative Amendments)

Include engineering drawings, operating parameters, manufacturer's specifications, and other information as requested for each piece of equipment directly related to the emission of pollutants to the atmosphere. It is not necessary to submit specifications for equipment not relevant to air pollution. If this application involves new construction or changes the manner in which the current process operates or this is an initial or renewal application, attach any equipment specifications below.

Attach the Equipment Specifications

Equipment Modification 1.5.24.docx - 01/05/2024 09:17 AM

Comment

Modification Registration Permit.

Additional Information

Suggested Specific Conditions

If you have any specific conditions that you would like to propose, attach them below.

Attach Any Suggested Specific Conditions

NONE PROVIDED

Comment

NONE PROVIDED

Other Information

If you have any other information that you would like to submit for review, attach it below.

Attach Any Other Information

NONE PROVIDED

Comment

NONE PROVIDED

Modeling Information

DEQ will perform screening modeling for Criteria and Non-Criteria Air Pollutants. If you have information that you would like to submit regarding modeling, attach it below.

NAAQS

DEQ will perform screening modeling for Criteria Air Pollutants under the following circumstances. If potential issues are identified as a result of this modeling, the facility will be contacted for additional information and requirements.

Other than modeling for projects requiring Prevention of Significant Deterioration (PSD) dispersion modeling, a NAAQS evaluation is required under the Arkansas State Implementation Plan, National Ambient Air Quality Standards, Infrastructure SIPs and NAAQS SIP per Ark. Code Ann. [§ 8-4-318](#), dated March 2017 and the DEQ Air Permit Screening Modeling Instructions for emission increases of:

- 100 tpy or greater PM10, for the 24-hour PM10 NAAQS.
- 100 tpy or greater SO2, for the 1-hour SO2 NAAQS. Modeling for the 3-hour SO2 NAAQS is not required.
- 100 tpy or greater NOx, for the 1-hour NO2 NAAQS. Modeling for the annual NO2 NAAQS is not required.

Refer to the DEQ Air Permit Screening Modeling Instructions at the link below for further information.

[Click Here for the DEQ Air Permit Screening Modeling Instructions](#)

Non-Criteria Pollutants

DEQ will perform screening modeling for Non-Criteria Air Pollutants (Hazardous Air Pollutants and Others). If potential issues are identified as a result of this modeling, the facility will be contacted for additional information and requirements.

Refer to the NCAPCS implementation guidance at the link below for further information.

[Click Here for the NCAPCS Implementation Guidance](#)

Attach Any Modeling Information

NONE PROVIDED

Comment

NONE PROVIDED

Agreements and Signature(s)

SUBMISSION AGREEMENTS

- ☒ I am the owner of the account used to perform the electronic submission and signature.
- ☒ I have the authority to submit the data on behalf of the facility I am representing.
- ☒ I agree that providing the account credentials to sign the submission document constitutes an electronic signature equivalent to my written signature.
- ☒ I have reviewed the electronic form being submitted in its entirety, and agree to the validity and accuracy of the information contained within it to the best of my knowledge.

*****The person digitally signing this form must be the same person referenced as the Responsible Official in this form or you must return to the previous screen and select the hard copy signature option and submit the hard copy certification with the Responsible Official's wet ink signature. If you are using the hard copy certification method, your application will not be considered complete until the original hard copy certification is received.*****

Certification of Application

I certify under penalty of law that this application and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signed
By Shannon Sullivan on 01/05/2024 at 2:10 PM

Summary of Permit Activity

American Greetings Corporation operates a greetings card printing, packaging, storage, and distribution facility (SIC code: 2771; NAICS 32311) at 1400 Ohlendorf Road, in Osceola, Arkansas.

Emissions from the facility result from various counters, cleaners, inks, glues, and other activities related to greetings card production. The raw materials used on site cause most of the facilities permitted emissions are volatile organic compounds (VOCs). There has been no manufacturing of screen-printed cards since December 2021. This was the sole source for Ethylene Glycol our only hazardous air pollutant.

We will continue operation of two (2) diesel fired water pump engines and two (2) diesel fired emergency generators. A small gasoline storage tank will remain on the property.

Process Description

The facility is primarily a card finishing and distribution point of seasonal greeting cards. The finishing work includes foil leaf application or embossing of card surfaces. In addition, specialty finishing includes thermographic powder, glitter, and water-based ink coating techniques.

Envelopes are also produced at this location. Tinting of paper, printing, and glue application are typical parts of the envelope process. Glue is also applied to specialty card boxes and card inserts. The facility produces a food packaging grade glue for these applications. Folding and Packaging of the cards into product sets finishes the production side of the card manufacturing.

This facility distributes several card lines and can re-sort incoming return items.

Equipment

The permittee is required to maintain a detailed list of equipment on site along with equipment identification numbers. This is required for the purpose of tracking changes made at the facility and the effects those changes will have on short term emission rates. This equipment tracking and evaluation of the effects to the emission rates will determine compliance with the permit limits and at the same time we'll determine the need for modifications to permit limits.

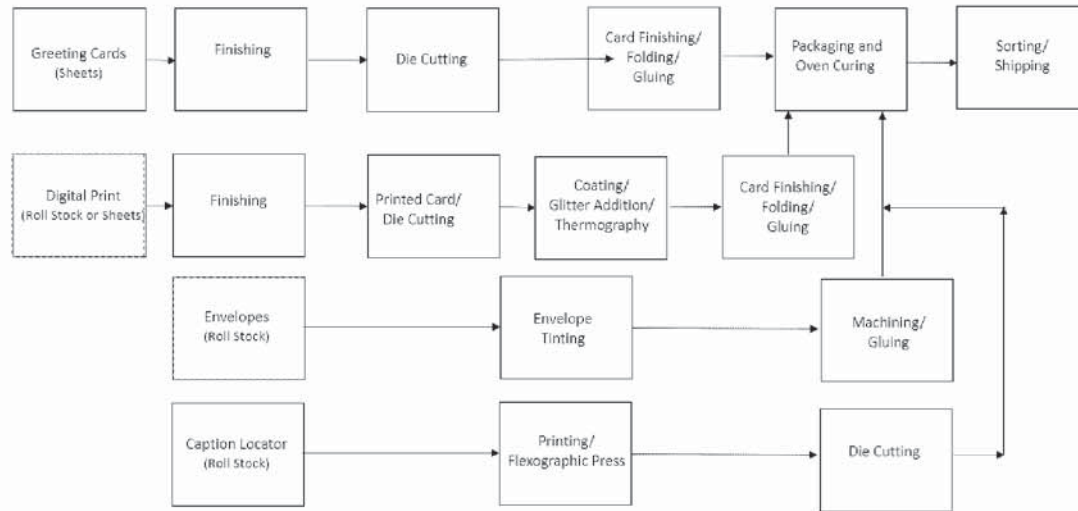
The permitted equipment associated with this facility is as follows:

- Printing and coating applicators;
- Hot stamp and embossing;
- Thermographic processes;
- Associated ink/coating dryers, ovens and boilers.

Regulations

This facility is not subject to any standards or requirements of 40 CFR 63 subpart K national emission standards for the printing and publishing industry. The facility operates flexographic printing equipment that does not meet the definition of a wide web flexographic press. Operating a flexographic press that is capable of printing substrates greater than 18 inches in width would subject the permittee to some of the requirements of this subpart.

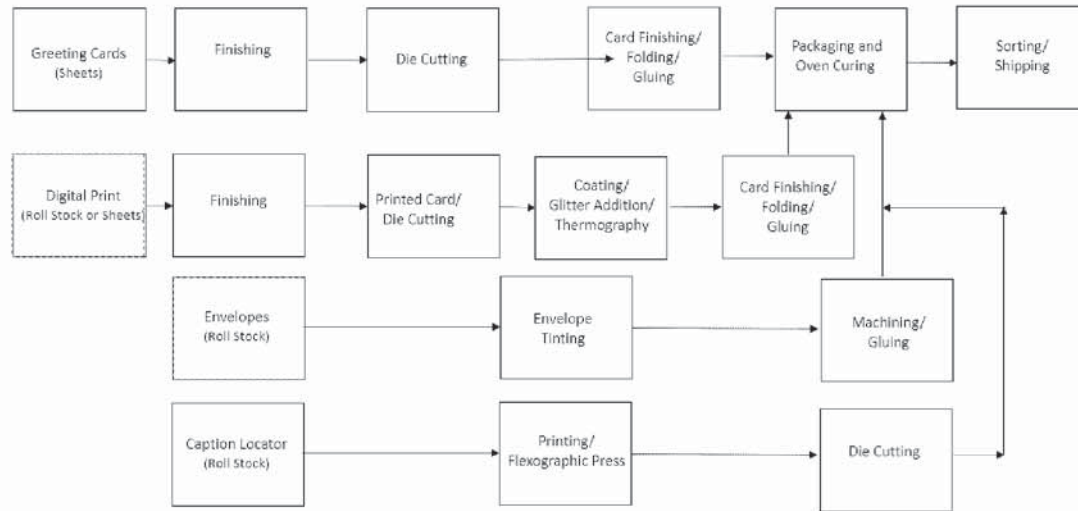
**American Greetings Corporation
Process Flow Diagram-Greeting Card Production**



Notes:

- 1) Finishing operations vary based on product and typically consist of hot stamping, thermography, die cutting, glitter addition, silk screening, flocking, and gluing/coating operations.
- 2) Various ancillary operations also occur at the plant such as engraving, laser cutting, and converting operations.
- 3) No process changes are occurring as a result of this De-Minimis application. See current air permit (1899-AR-2) for additional details on the facility's operations.

**American Greetings Corporation
Process Flow Diagram-Greeting Card Production**



Notes:

- 1) Finishing operations vary based on product and typically consist of hot stamping, thermography, die cutting, glitter addition, silk screening, flocking, and gluing/coating operations.
- 2) Various ancillary operations also occur at the plant such as engraving, laser cutting, and converting operations.
- 3) No process changes are occurring as a result of this De-Minimis application. See current air permit (1899-AR-2) for additional details on the facility's operations.

From: WB Wayne Bailey (1397) <Wayne.Bailey@amgreetings.com>
Sent: Tuesday, January 9, 2024 1:28 PM
To: Karen Cerney (adpce.ad)
Cc: CE Carol Edson (5218); John Shipp
Subject: RE: [External] Additional Information
Attachments: Example of Master Inventory-November 2023.xlsx; Air Emissions Calculations - Dec 2021 -- Nov 2023.xlsx

Ms. Cerney, regarding your request for calculations associated with the individual sources at the facility, please find two files attached. The first file provides the detailed emission calculations for the past 24 months (through November 2023 – December material usage data are not yet complete) and the second file is an example of the monthly detailed material usage data on which the monthly emission calculations are based. These emissions are the emissions from Source SN-01.

If you need additional information, please let me know.

Wayne Bailey

From: Karen Cerney (adpce.ad) <Karen.Cerney@adeq.state.ar.us>
Sent: Monday, January 8, 2024 4:18 PM
To: WB Wayne Bailey (1397) <Wayne.Bailey@amgreetings.com>
Subject: [External] Additional Information

You don't often get email from karen.cerney@adeq.state.ar.us. [Learn why this is important](#)

This email is from an external source. Do not open any attachments or click on any links unless you know the sender and are also certain the content is safe.

Mr. Bailey,

I am currently reviewing your registration request. I need calculations associated with each of the following individual sources at the facility (1.) printing & coating, 2.) Hot stamp and embossing, 3.) Thermographic processes, and 4.) Associated ink/coating dryers, ovens and boilers. I need each of these as actual calculations or the historic data that the emissions are being pulled from, not a summary of emissions for the whole facility so I can tell what is still being used at the facility. Please send them to me by January 15, 2024. If we do not receive the information by the requested date or if arrangements have not been made to submit the information, processing of your registration may be suspended or terminated.

Thank you,
Karen Cerney | Engineer Supervisor
Division of Environmental Quality | Office of Air Quality
5301 Northshore Drive | North Little Rock, AR 72118
t: 501.682.0731 | e: cerney@adeq.state.ar.us

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