

ADEQ MINOR SOURCE AIR PERMIT

Permit #: 1899-AR-1

IS ISSUED TO:

American Greetings Corporation
1400 Ohlendorf Road
Osceola, AR 72370
Mississippi County
AFIN: 47-00030

THIS PERMIT IS YOUR AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'S MINOR SOURCE AIR PERMIT AND YOUR APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. SEC. 8-4-101 ET SEQ.) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels

Date

SECTION I: FACILITY INFORMATION

PERMITTEE:	American Greetings Corporation
AFIN:	47-00030
PERMIT NUMBER:	1899-AR-1
FACILITY ADDRESS:	1400 Ohlendorf Road Osceola, AR 72370
COUNTY:	Mississippi
CONTACT POSITION:	Steve Brothers, Plant Manager
TELEPHONE NUMBER:	(870) 563-5221
REVIEWING ENGINEER:	Bryan Leamons
UTM North-South (Y):	3952.9
UTM East-West (X):	230.4
Zone:	16

American Greeting Corporation
Permit #: 1899-AR-1
AFIN: 47-00030

SECTION II: INTRODUCTION

Summary

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

Emissions from the facility result from various counters, cleaners, inks, glues, and other activities related to greeting card production. The raw materials used on site cause most of the facility's permitted emissions of volatile organic compounds (VOCs) as well as hazardous air pollutants (HAPs).

This permitting action incorporates changes approved in *de Minimis* applications received in June 2002, August 2002, and January 2003. The approved June 2002, application allowed the construction and operation of a verse insert press, a flexographic printer, in the SN-01 source area. The approved August 2002, application incorporates retirement of ten envelope machines from the SN-01 source area. Also, the approval of the August application allowed the removal of two thermographic printers from the SN-02 area and installation of the same machines in a new area which was then designated as SN-05. The approved January 2003, application allowed consolidation of all sources into one source area (SN-01), adjustment to the HAP TLV table, and installation of silk screening equipment into a new area temporarily designated SN-02 for *de Minimis* purposes. This last *de Minimis* was subsequently followed up by a full modification application received in April 2003. The April 2003 modification requests changes to allow the permittee to operate SN-02 equipment from the January 2003, application without the *de Minimis* restrictions as part of SN-01. The modification also includes permit language to allow flexibility in changing out similar equipment at the facility.

The two *de Minimis* applications that were received in 2002 obtained a draft permit in October 2002, that was never finalized. This permit is the result of a redraft and incorporates all necessary changes to close all application listed above.

Process Description

This facility is primarily a 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 application of thermographic powder, glitter, flock, or 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.

American Greeting Corporation
Permit #: 1899-AR-1
AFIN: 47-00030

This facility distributes several card lines and has the ability to re-sort incoming returned 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 purposes 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 effects to emission rates will determine compliance with the permit limits and at the same time will determine the need for modifications to permit limits.

The permitted equipment associated with this facility is as follows:

- C Printing and coating applicators;
- C Hot stamp and embossing;
- C Die and plate preparation related equipment;
- C Silkscreen related equipment;
- C Thermographic processes;
- C Associated ink/ coating dryers, ovens and boiler.

Regulations

This facility is subject to regulation under the *Arkansas Air Pollution Control Code* (Regulation 18) and the *Regulations of the Arkansas State Implementation Plan for Air Pollution Control* (Regulation 19).

This facility is not subject to any standards or requirements of 40 CFR 63, Subpart KK, *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 requirements of this subpart.

This facility operates a 1.68 MM Btu/hr boiler which is not subject to requirements of 40 CFR 60, Subpart Dc, *Standards of Performance for Small - Industrial - Commercial - Institutional Steam Generating Units*. The boiler has a heat input capacity less than 10 MM Btu/hr.

Emission Summary

American Greeting Corporation
Permit #: 1899-AR-1
AFIN: 47-00030

The following table is a summary of the facility's total emissions.

TOTAL ALLOWABLE EMISSIONS

Pollutant	lb/hr	tpy
PM	1.8	5.7
PM ₁₀	1.8	5.7
VOC	79.6	92.9

Pollutant	tons per month	tpy
Combined HAPs	2.05	24.5
Individual HAPs	0.80	9.5
Glycol ethers [*]	0.39	4.6

^{*} Glycol ethers are included in Combined HAPs. All HAPs are included in VOC.

American Greeting Corporation
Permit #: 1899-AR-1
AFIN: 47-00030

SECTION III: PERMIT HISTORY

Permit #1899-A, issued May 14, 2002, was the initial permit for this facility allowing operation of a greeting card manufacturing facility.

American Greeting Corporation
Permit #: 1899-AR-1
AFIN: 47-00030

SECTION IV: EMISSION UNIT INFORMATION

Specific Conditions

- Pursuant to §19.501 et seq. of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control, effective February 15, 1999 (Regulation 19) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated by compliance with Specific Condition 6, 9, and 11

SN	Description	Pollutant	lb/hr	tpy
01	Plantwide	PM ₁₀	1.8	5.7
		VOC	79.6	92.9

- Pursuant to §18.801 of the Arkansas Air Pollution Control Code, effective February 15, 1999 (Regulation 18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated by compliance with Specific Condition 7, 9, and 11.

SN	Description	Pollutant	lb/hr	tpy
01	Plantwide	PM	1.8	5.7

SN	Description	Pollutant	tons per month	tpy
01	Plantwide	Combined HAPs	2.05	24.5
		Individual HAPs	0.80	9.5
		Glycol ethers*	0.39	4.6

* Glycol ethers are a subset of the "combined HAPs" and must be included in as a part of these but not by the individual HAPs

- Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions shall not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

SN	Limit	Regulatory Citation
01	15%	§18.501

American Greeting Corporation
Permit #: 1899-AR-1
AFIN: 47-00030

4. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation 18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303.
5. Pursuant to §18.901 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne.
6. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall demonstrate compliance with the facility-wide 92.9 tons per year VOC emission rate by maintaining monthly VOC material balance calculations. The permittee shall keep a plantwide twelve-month rolling total along with each individual month's data and calculations. Calculations shall be updated by the fifteenth day of the month following the month to which the records pertain. Calculations shall be kept on-site and made available to Department personnel upon request.
7. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall demonstrate compliance with the facility-wide HAP tons per year emission rates permitted by Specific Condition 2 by maintaining monthly HAP material balance calculations specific to each HAP plantwide. The permittee shall not exceed 9.5 tons per year of an individual HAP nor 24.5 tons per year of combined HAPs. Total glycol ethers shall not exceed 4.6 tons per year. The permittee shall keep a plantwide twelve month rolling total along with each individual month's data. Calculations shall be updated by the fifteenth day of the month following the month to which the records pertain. Calculations shall be kept on-site and made available to Department personnel upon request.
8. Pursuant to §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, with the exception of glycol ether containing materials, the permittee shall demonstrate compliance with the following table for any HAP or other non-criteria pollutant containing material used at the facility:

Minimum HAP/ Non-criteria TLV (mg/m3)	Maximum Allowable Content (Wt %)	Minimum HAP/ Non-criteria TLV (mg/m3)	Maximum Allowable Content (Wt %)
389.07	100	155.63	40

American Greeting Corporation
Permit #: 1899-AR-1
AFIN: 47-00030

Minimum HAP/ Non-criteria TLV (mg/m3)	Maximum Allowable Content (Wt %)	Minimum HAP/ Non-criteria TLV (mg/m3)	Maximum Allowable Content (Wt %)
350.16	90	116.72	30
311.26	80	77.81	20
272.35	70	38.91	10
233.44	60	19.45	5
194.54	50	3.89	1

The permittee shall keep copies of product labels, MSDS sheets, or similar content information of all HAP containing materials used on site. The labels shall be available for inspection in order to demonstrate compliance with these tables. TLVs used must be published by the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values (TLV) values as listed on current MSDS forms, or in the ACGIH handbook of Threshold Limit Values (TLVs) and Biological Exposure Indices (BEIs). TLVs not published by this reference must receive written approval by the Department.

9. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall operate baghouse control devices according to manufacturer specifications and control equipment specifications submitted in permit application materials.
10. Pursuant to §19.405(B) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not operate flexographic printing equipment which is capable of printing substrates greater than 18 inches in width.
11. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, compliance with all short term limits of Specific Conditions 1 and 2 shall be demonstrated by calculating the average hourly emission rate using monthly material usage records (material balance) divided by the monthly production run hours. AP-42 factors shall be used for PM/ PM₁₀. Calculations shall be updated by the fifteenth day of the month following the month to which the records pertain. Calculations shall be kept on-site and made available to Department personnel upon request.
12. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, and A.C.A. §8-4-203

American Greeting Corporation
Permit #: 1899-AR-1
AFIN: 47-00030

as referenced by §8-4-304 and §8-4-311, the permittee shall maintain an up-to-date list of all process emission sources present at this facility. This list shall be updated each time there is a change to any emission source at SN-01. Changes include but are not limited to swapping equipment for like replacements, changes in method of operation or operating rate, removal or addition of a new piece of equipment. This list shall include the manufacturer and model number of each piece of equipment at the facility. Each time a change is made affecting this list, the permittee shall evaluate the effect the new operation will have on actual emission rates and whether they will comply with the permitted short and long term emissions in Specific Conditions 1 and 2.

This list does not shield the permittee from violations to emission rates and subsequent enforcement actions. This list shall be maintained with a copy of the permit and made available to Department personnel upon request.

13. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee may implement equipment changes so long as the following requirements are met:
 - a. Equipment is used to produce greeting cards or is used in conjunction with equipment for the purpose of producing greeting cards;
 - b. The equipment is not regulated by federal standards, for example 40 CFR Part 60, *New Source Performance Standards* (NSPS) or 40 CFR Part 63, *National Emission Standards for Hazardous Air Pollutants* (NESHAP);
 - c. The equipment is of the type described and listed in the process description of this permit and does not involve VOC control devices;
 - d. The equipment complies with Specific Condition 12.
14. Pursuant to §18.1004 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, annually the permittee shall evaluate glycol ethers and their compliance with the Department's Non Criteria Pollutant Control Strategy. The permittee shall determine actual glycol ether pound per hour emission rates derived from the latest information regarding glycol ether containing product usage. Dispersion modeling shall be used to demonstrate that there are no off-site impacts greater than 1/100th of any specific glycol ether's threshold limit value. This analysis shall be updated annually by June 30th.

American Greeting Corporation
Permit #: 1899-AR-1
AFIN: 47-00030

SECTION V: INSIGNIFICANT ACTIVITIES

The following activities and emissions are specifically deemed insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application received by the Department on December 20, 1999, and subsequent information received through November 21, 2001.

The following activities are specifically exempted by A-1:

At Room 1, a 1.68 MM Btu/hr boiler used intermittently to produce steam for a glue production operation.

Discussion of activities exempted by A-13 and A-9:

At American Greetings several activities throughout the facility involve the usage of small amounts of HAP and VOC containing materials and the usage of materials containing extremely small weight fractions of HAPs (i.e. <1% by weight). According to application materials these emissions are insignificant in accordance with A-13 insignificant activities when calculated at their maximum potential usage. Calculations performed to quantify emissions from these activities show that these materials and associated emission rates need not be accounted for because of their low emissions and sporadic usage projections. Emissions from all of such activities are less than 5 tons per year of VOC, less than 1 ton per year of a single HAP, and less than 2.5 tons per year of combined HAPs. These exemptions do not apply to any bulk process materials (such as inks).

Several activities are insignificant based on the insignificant activities list, A-9. These are a verse insert and high speed folder and glue operations. In these operations the material used contains no more than 0.4 lb/gal. VOCs, no hexavalent chromium, and no more than 0.1 tpy of all other HAPs. Regardless of the citation (A-9 or A-13) all insignificant activities total less than the threshold values of 5 tons per year of VOC, less than 1 ton per year of a single HAP, and less than 2.5 tons per year of combined HAPs.

Laser Operations

Laser operation located in Room 4 is exempt by B-29.

American Greeting Corporation
Permit #: 1899-AR-1
AFIN: 47-00030

SECTION VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder.
3. Pursuant to §19.704 of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19) and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the Department shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
4. Pursuant to §19.410(B) of Regulation 19 and/or §18.309(B) of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, construction or modification must commence within eighteen (18) months from the date of permit issuance.
5. Pursuant to §19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, records must be kept for five years which will enable the Department to determine compliance with the terms of this permit--such as hours of operation, throughput, upset conditions, and continuous monitoring data. The records may be used, at the discretion of the Department, to determine compliance with the conditions of the permit.

American Greeting Corporation
Permit #: 1899-AR-1
AFIN: 47-00030

6. Pursuant to §19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any reports required by any condition contained in this permit shall be certified by a responsible official and submitted to the Department at the address below.

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor
Post Office Box 8913
Little Rock, AR 72219

7. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.
8. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:
- a. Sampling ports adequate for applicable test methods
 - b. Safe sampling platforms
 - c. Safe access to sampling platforms
 - d. Utilities for sampling and testing equipment
9. Pursuant to §19.303 of Regulation 19 and/or §18.1104 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.
10. Pursuant to §19.601 of Regulation 19 and/or §18.1101 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, if the permittee exceeds an emission limit established by this permit, they shall be deemed in violation of said permit and shall be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the

American Greeting Corporation
Permit #: 1899-AR-1
AFIN: 47-00030

following requirements are met:

- a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and that all reasonable measures have been taken to immediately minimize or eliminate the excess emissions.
 - b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
 - c. The permittee shall submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, it need not be submitted again.
11. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall allow representatives of the Department upon the presentation of credentials:
 - a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit
 - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act
 - c. To inspect any monitoring equipment or monitoring method required in this permit
 - d. To sample any emission of pollutants
 - e. To perform an operation and maintenance inspection of the permitted source
12. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit is issued in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus.
13. Pursuant to §19.410(A) of Regulation 19 and/or §18.309(A) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall be subject to revocation or modification when, in the judgment of the Department, such revocation or modification shall become necessary to comply with the applicable provisions of the

American Greeting Corporation
Permit #: 1899-AR-1
AFIN: 47-00030

Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder.

14. Pursuant to §19.407(B) of Regulation 19 and/or §18.307(B) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit may be transferred. An applicant for a transfer shall submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. A transfer may be denied on the basis of the information revealed in the disclosure statement or other investigation or, if there is deliberate falsification or omission of relevant information.
15. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall be available for inspection on the premises where the control apparatus is located.
16. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.
17. Pursuant to Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit supersedes and voids all previously issued air permits for this facility.
18. Pursuant to A.C.A §8-1-105(c), the permittee must pay all permit fees in accordance with the procedures established in Regulation 9.