



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

C.L. "Butch" Otter, Governor
Toni Hardesty, Director

February 13, 2008

Certified Mail No. 7190 0596 0014 0000 1645

Mr. Robert Farrell, CEO
Packaging Specialties of Idaho
P.O. Box 360
Fayetteville, AR 72702

RE: Facility ID No. 031-00036, Packaging Specialties of Idaho, Burley
Final Permit Letter

Dear Mr. Farrell:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2007.0219 to Packaging Specialties of Idaho in Burley, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on November 23, 2007. This permit is effective immediately. This permit does not release Packaging Specialties of Idaho from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to General Provision 5 of your permit, it is required that Construction and Operation Notification be provided. Please provide this information as listed to DEQ's Twin Falls Regional Office, 1363 Fillmore Street, Twin Falls, ID 83301, Fax (208) 736-2194.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Stephen VanZandt, Air Quality Coordinator, at (208) 736-2190 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

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Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to contact Jonathan Pettit at (208) 373-0502 or Jonathan.Pettit@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Simon". The signature is fluid and cursive, with a large initial "M" and "S".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\JP\hp

Project No. P-2007.0219

Enclosures

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HARD COPY TO FACILITY

en: Stephen Vanzandt, Twin Falls Regional Office
Jonathan Pettit, Permit Writer
Marilyn Seymore/ Pat Rayne, AQ Division
Helen Price, Stationary Source Administrative Assistant

en-web: Laurie Kral, U.S. EPA Region 10

ec: Robert Farrell, rfarrell@psi-ark.com
George Lon, glong@psi-ark.com
Shannon Lynn, ECCL, SLynn@eccci.com

c: Reading File (Ltr Only)
Source File
Permit Binder
Bill Rogers, Permit Coordinator (Ltr Only)
Phyllis Heitman, AQ Division (Ltr Only)



**Air Quality
PERMIT TO CONSTRUCT
State of Idaho
Department of Environmental Quality**

PERMIT No.: P-2007.0219
FACILITY ID No.: 031-00036
AQCR: 63 **CLASS:** B
SIC: 2759 **ZONE:** 12
UTM COORDINATE (km): 334.361, 4651.71

1. PERMITTEE
Packaging Specialties, Inc.

2. PROJECT
Initial PTC

3. MAILING ADDRESS P.O. Box 360	CITY Fayetteville	STATE AR	ZIP 72702
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4. FACILITY CONTACT George Long	TITLE Customer Service Manager	TELEPHONE (479) 521-0280
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5. RESPONSIBLE OFFICIAL Robert Farrell	TITLE CEO	TELEPHONE (479) 521-2580
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6. EXACT PLANT LOCATION 126 S. 100 West, Burley, ID 83318	COUNTY Cassia
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7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS
Flexographic printing facility

8. PERMIT AUTHORITY

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes in design, equipment or operations may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 through 228 of the Rules for the Control of Air Pollution in Idaho.


 JONATHAN PETTIT, PERMIT WRITER
 DEPARTMENT OF ENVIRONMENTAL QUALITY


 MIKE SIMON, STATIONARY SOURCE PROGRAM
 MANAGER
 DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE MODIFIED/REVISED:	
DATE ISSUED:	February 13, 2008

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Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pound per hour
MMBtu	million British thermal units
PTC	permit to construct
PTE	potential to emit
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
T/yr	tons per year
$\mu\text{g}/\text{m}^3$	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0219

Permittee: Packaging Specialties, Inc.

Facility ID No. 031-00036

Location: Burley, Idaho

1. PERMIT TO CONSTRUCT SCOPE

Purpose

1.1 This is the initial Permit to Construct for the construction and operation of a new flexographic printing facility.

Regulated Sources

1.4 Table 1.1 lists all sources of regulated emissions in this PTC.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control
2	<p><u>Printing press Operations</u> <u>10-Color Printing Press (EU-001)</u> Manufacturer: P.C.M.C. Model: Infinity NT Max Capacity: 360 lb/hr of Solvent Date of Construction: November 2007</p> <p><u>10-Color Printing Press (EU-002)</u> Manufacturer: P.C.M.C. Model: Infinity NT Max Capacity: 360 lb/hr of Solvent Date of Construction: November 2007</p>	<p><u>Regenerative Thermal Oxidizer (RTO) (EU-003)</u> Manufacturer: Anguil. Model: 150 Max Capacity: 3.7 MMBtu/hr Fuel: Natural Gas Control Efficiency: 97% Date of Construction: November 2007</p>

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Location:	Burley, Idaho	

2. PRINTING PRESS OPERATIONS

2.1 Process Description

Printing press operations consist of two 10-color flexographic printing presses which utilize clear film that is unwound in the press as it passes through each of the printing decks where the ink is applied. An electric dryer with forced air dries the ink and exhausts the VOC-laden air to the Regenerative Thermal Oxidizer (RTO).

2.2 Emissions Control Description

Emissions from the printing presses are controlled by a Regenerative Thermal Oxidizer (RTO) with a minimum destruction efficiency of 97%. Each press is also equipped with an individual exhaust stack that is vented to the atmosphere. Each exhaust stack is locked in the closed position and would only be used during an upset condition with the RTO.

Table 2.1 PRINTING PRESS OPERATIONS DESCRIPTION

Emissions Units / Processes	Emissions Control Device	Emissions Point
<u>10-Color Printing Press (EU-001)</u> Manufacturer: P.C.M.C. Model: Infinity NT Max Capacity: 360 lbs of solvent/hr Date of Construction: November 2007	<u>Regenerative Thermal Oxidizer (RTO) (EU-003)</u> Manufacturer: Anguil. Model: 150 Max Capacity: 3.7 MMBtu/hr Fuel: Natural Gas Manufacturer Control Efficiency: 97% Date of Construction: November 2007	Each printing press will be exhausted to the RTO at stack EU-003. The printing press will also be vented to stack EU-001 directly from the emission unit.
<u>10-Color Printing Press (EU-002)</u> Manufacturer: P.C.M.C. Model: Infinity NT Max Capacity: 360 lbs of solvent/hr Date of Construction: November 2007		Each printing press will be exhausted to the RTO at stack EU-003. The printing press will also be vented to stack EU-002 directly from the emission unit.

Emissions Limits

2.3 Emissions Limits

- Volatile Organic Compound (VOC) emissions from the Printing Operation stacks shall not exceed 50 tons during any consecutive 12-calendar month period.
- Emissions of any single Hazardous Air Pollutant (HAP) from the entire facility shall not equal or exceed 10 tons per any consecutive 12-calendar month period.
- Emissions of any combination of HAPs from the entire facility shall not equal or exceed 25 tons per any consecutive 12-calendar month period.

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2.4 Opacity Limit

Emissions from the Printing press stacks and the Regenerative Thermal Oxidizer stack, or any other stack, vent, or functionally equivalent opening associated with the printing press operations, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

2.5 Odor Emissions

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere of such nature and duration and under such conditions as would be injurious to human health or welfare, to animal or plant life, or to property, or to interfere unreasonably with the enjoyment of life or property in accordance with IDAPA 58.01.01.776.

Operating Requirements

2.6 Ink and Solvent Usage

Prior to using any ink or solvent that contains a toxic air pollutant listed in either IDAPA 58.01.01.585 or IDAPA 58.01.01.586, the permittee shall determine the pounds of the ink and solvent that may be used during any calendar day. The amount that may be used shall be determined based on one of the following equations. Equations No. 1 shall be used to determine the amount of ink and/or solvent that may be used in operations where emissions are not controlled by the RTO and for inks and solvents that are volatile. Equation 2 shall be used to determine the amount of ink and/or solvent that may be used in operations where volatile TAP emissions are controlled by the RTO. Equation 3 shall be used to determine the amount of ink used in operations where there is a known ink solids transfer efficiency.

Eq. 1 Uncontrolled and volatile TAPs

$$\frac{\text{Lbs. of Ink or Solvent}}{\text{Calander Day}} = \frac{EL^a * 24}{\% \text{ by weight of TAP in Ink or Solvent}^b}$$

^a Emission Screening Limit from IDAPA 58.01.01.585 or 586

^b TAP listed in Manufacturer Formulation Data Sheet or Material Safety Data Sheet

Eq. 2 RTO Controlled and Volatile TAPs

$$\frac{\text{Lbs. of Ink or Solvent}}{\text{Calander Day}} = \frac{EL^a * 24}{(\% \text{ by weight of TAP in Ink or Solvent}^b) * (1 - 0.97)^c}$$

^a Emission Screening Limit from IDAPA 58.01.01.585 or 586

^b TAP listed in Manufacturer Formulation Data Sheet or Material Safety Data Sheet

^c Manufacturers control efficiency of the Regenerative Thermal Oxidizer

Eq. 3 Non-volatile TAPs

$$\frac{\text{Lbs. of Ink}}{\text{Calander Day}} = \frac{EL^a * 24}{(\% \text{ by weight of TAP in Ink or Solvent}^b) * (1 - \% T.F.)^c}$$

^a Emission Screening Limit from IDAPA 58.01.01.585 or 586

^b TAP listed in Manufacturer Formulation Data Sheet or Material Safety Data Sheet

^c Printing Press Transfer efficiency as a percentage.

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2.7 Fuel Combustion

The owner or operator shall combust pipeline quality natural gas exclusively in the Regenerative Thermal Oxidizer.

2.8 Material Purchase Records

The permittee shall maintain material purchase records of all printing-related materials that contain, but are not limited to, the following information:

- the name and identification number for each solvent and ink used;
- the percent by weight of each VOC, TAP, and HAP in each compound;
- gallons and pounds of solvents and inks used; and
- the actual hours of operation per month at the facility.

The purchase records shall be maintained in accordance with General Provision 7.

2.9 Manufacturer Data Sheets

The owner or operator shall maintain the Manufacture Formulation Data Sheets or Material Safety Data Sheets for the printing-related materials that contain TAPs, HAPs and VOCs purchased pursuant to permit condition 2.8. Manufacturer data sheets shall be maintained in accordance with General Provision 7.

2.10 Regenerative Thermal Oxidizer (RTO) Operations

- The owner or operator shall operate the RTO at all times when printing operations are not operating with water based inks.
- The owner or operator shall operate and maintain the RTO in accordance with Manufacturer specifications and recommendations and in accordance with General Provision 2.

Monitoring and Recordkeeping Requirements

2.11 Odor Monitoring Requirements

The permittee shall maintain records of all odor complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the complaint, any corrective action taken, and the date the corrective action was taken.

2.12 VOC, HAP, and TAP Recordkeeping Requirements

The permittee shall collect and maintain records of the following information to demonstrate compliance with Permit Condition 2.3 and IDAPA 58.01.01.585 and 586. The permittee shall perform the required calculations on a monthly basis, using information from Permit Condition 2.8 and 2.9 and data from the previous 12-months of operation.

- The total HAP emission rate, in tons per 12-calendar month period, for each month. The total HAP emission rate shall be calculated as a rolling 12-month emission rate, and determined on a monthly basis.
- The total VOC emission rate, in tons per 12-calendar month period, for each month. The total VOC emission rate shall be calculated as a rolling 12-month emission rate, and determined on a monthly basis.

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For each TAP emitted, the permittee shall collect and maintain records of the following information in accordance with General Provision 7, to demonstrate compliance screening emission levels of IDAPA 58.01.01.585 and 586:

- The TAP emissions rate from the facility on a daily basis to demonstrate compliance with IDAPA 58.01.01.585. Pounds per hour TAP emissions rate shall be calculated by dividing the pounds of TAP emissions per day by the daily hours of operation.
- The TAP emissions rate from the facility on a monthly basis to demonstrate compliance with IDAPA 58.01.01.586. Pounds per hour TAP emissions rate shall be calculated as a rolling 12-month emission rate by dividing the pounds of TAP emissions per 12-calendar month period by the hours of operation per 12-calendar month period.
- If any TAP emissions rate exceeded the screening emissions level, the permittee shall conduct ambient air quality modeling to demonstrate compliance with the AAC or AACC listed in IDAPA 58.01.01.585 or 58.01.01.586. Any exceedance of an AAC or AACC shall be reported as an excess emission in accordance with General Provision 8.

The permittee shall collect and maintain documentation of the assumptions and method of calculation used to determine the emission rates. Documentation shall include but is not be limited to the following:

- The name and volume of each ink and solvent used, in gallons per day, for each day.
- The name and volume of each ink and solvent used, in gallons per 12-calendar month period, for each month.
- The hours of operation each day for the facility.
- The hours of operation each 12-calendar month period for the facility, for each month.
- The density of each ink and solvent used, in pounds per gallon.
- The mass fraction of organic HAP, in percent by weight for each ink and solvent used.
- The mass fraction of each TAP contained in each ink and solvent used, in percent by weight.
- The screening emissions level of each TAP contained in each ink and solvent used.

Records of this information shall remain on site and be made available to DEQ representatives upon request and be maintained in accordance with General Provision 7.

2.13 Operations and Maintenance Manual Requirements

Within 60 days of permit issuance, the permittee shall have developed and submitted to DEQ an Operations and Maintenance (O&M) manual for the Regenerative Thermal Oxidizer which describes the procedures to be followed to comply with General Provision 2 of this permit and the manufacturer specifications for the air pollution control device. At a minimum the following shall be included in the manual:

- The manufacturer's recommended values that shall be maintained for each of the following operating parameters:
 - Minimum temperature
 - Maximum flow rate
- Requirements to periodically monitor and record the parameters listed above no less frequently than each 12-calander month.

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All records shall be maintained on site for a period of 5 years, shall be made available to DEQ representatives upon request, and be maintained in accordance with General Provision 7.

The contents of the O&M manual shall be based on the manufacturer's specifications. A copy of the manufacturer's recommendations shall be included with the O&M Manual and both shall be made available to DEQ representatives upon request.

As an alternative to the manufacture operating parameters the permittee may establish new operating parameters by conducting a performance test that demonstrates compliance Permit Condition 2.3 while operating at the alternative operating parameters. The performance test shall be conducted in accordance with the Test Methods and Procedures specified in the Rules (IDAPA 58.01.01.157) and in accordance with a DEQ approved source test protocol. All operating parameters specified in this permit condition shall be continuously monitored and recorded during each test run. The permittee may request to operate outside of the operating parameters specified by the manufacturer during the performance test by submitting a written source protocol to DEQ for approval and requesting to operate under alternative operating parameters during the duration of the test. The protocol shall describe how the operating parameters will be monitored during the performance test. Once the source test is completed the permittee may request in writing to operate in accordance with alternative operating parameters. The request shall include a source test report and justification for the alternative operating parameters. Upon receiving DEQ written approval of the source test and the requested alternative operating parameters, the permittee shall operate in accordance with those DEQ approved alternative operating parameters. A copy of DEQ's approval shall be maintained on site with a copy of this permit.

The O&M manual shall be submitted to DEQ within 60 days of permit issuance and shall contain a certification by a responsible official. Any changes to the O&M Manual shall be submitted within 15 days of the change.

The operation and monitoring requirements specified in the O&M manual are incorporated by reference to this permit and are enforceable permit conditions.

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3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

General Compliance

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.

[Idaho Code §39-101, et seq.]
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[IDAPA 58.01.01.211, 5/1/94]
3. Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
 - a. Enter upon the permittee's premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Construction and Operation Notification

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
 - a. A notification of the date of initiation of construction, within five working days after occurrence;
 - b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;

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- c. A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211, 5/1/94]

Performance Testing

6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

7. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

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Excess Emissions

8. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

Certification

9. All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

10. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

Tampering

11. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Transferability

12. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

13. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]