CR#5035211 $1,000

CLEARWATER PAPER | Consumer Products Division

Clearwater Paper Corporation
801 Mill Road
Lewiston, Idaho 83501

RECEIVED
SEP 12 2011
DEPARTMENT OF ENVIRONMENTAL QUALITY
STATE A Q PROGRAM

Air Quality Program Office
Application Processing
Idaho Department of Environmental Quality
1410 North Hilton
Boise, Idaho 83706-1255

Attention: Mike Simon, Stationary Source Program Manager

Re: Permit to Construct Application Required by a Consent Order

Dear Mike:

Clearwater Paper Corporation, Consumer Products Division (CPD), and the Department recently finalized an air quality consent order. The effective date of the consent order was July 5th, 2011. Paragraph 9B of the consent order required Clearwater Paper to submit a permit to construct (PTC) application within 120 days of the effective date to obtain a voluntary enforceable facility-wide emissions limit of 39 tons of VOCs for CDP. Enclosed is a timely application that fulfills this obligation of the consent order.

No physical change or change in the method of operation prompted this application. Therefore, the application consists of only the relevant Department forms and an emissions inventory. The emissions inventory estimates a baseline of current (2010) VOC, HAPs, and TAPs emissions and projects HAPs and TAPs emissions in light of the negotiated voluntary VOC emissions limit of 39 tons. Emissions are generated from the use of inks, glues, and coatings applied on various converting lines operated by CPD. Based upon review of these operations by the Department during the recent enforcement discussions, Clearwater Paper volunteered to self-impose a facility-wide emissions limit, as described in Paragraph 9A of the consent order.

If you have any questions, please contact Marv Lewallen, Director of Environment and Energy for Clearwater Paper, at (509) 344-5956. Based upon information and belief formed after reasonable inquiry, the statements and information in the PTC application are true, accurate, and complete.

Sincerely,

William Copenspire

William Copenspire, Consumer Products Mill Manager

cc: Steve Bacom, IDEQ

**DEQ AIR QUALITY PROGRAM**
1410 N. Hilton, Boise, ID 83706
For assistance, call the
**Air Permit Hotline – 1-877-5PERMIT**

General Information **Form GI**
Revision 7
2/18/10

*Please see instructions on page 2 before filling out the form.*

***All information is required. If information is missing, the application will not be processed.***

## IDENTIFICATION

| 1. Company Name | 2. Facility Name: |
|---|---|
| Clearwater Paper Corporation, Lewiston Facility | Consumer Products Division |

| | |
|---|---|
| 3. Brief Project Description: | PTC application required by Consent Order E-2010.0019 executed on July 5th, 2011 to establish negotiated emissions limits. |

## FACILITY INFORMATION

| | | | | |
|---|---|---|---|---|
| 4. Primary Facility Permit Contact Person/Title | Cindy Eccles | | | |
| 5. Telephone Number and Email Address | 208-799-1904<br>cindy.eccles@clearwaterpaper.com | | | |
| 6. Alternate Facility Contact Person/Title | Dave Church | | | |
| 7. Telephone Number and Email Address | 208-799-8882<br>dave.church@clearwaterpaper.com | | | |
| 8. Address to Which the Permit Should be Sent | PO Box 57 | | | |
| 9. City/County/State/Zip Code | Lewiston | Nez Perce | Idaho | 83501 |
| 10. Equipment Location Address (if different than the mailing address above) | | | | |
| 11. City/County/State/Zip Code | | | | |
| 12. Is the Equipment Portable? | ☐ Yes ☒ No | | | |
| 13. SIC Code(s) and NAICS Code | Primary SIC: 2621 | Secondary SIC: | NAICS: 322110 | |
| 14. Brief Business Description and Principal Product | Tissue Manufacturing | | | |
| 15. Indentify any adjacent or contiguous facility that this company owns and/or operates | Clearwater Paper Corporation, Idaho Pulp and Paperboard & Wood Products Division | | | |
| 16. Specify the reason for the application | ☒ Permit to Construct (PTC)<br>For Tier I permitted facilities only: If you are applying for a PTC then you must also specify how the PTC will be incorporated into the Tier I permit.<br>☐ Incorporate the PTC at the time of the Tier I renewal<br>☐ Co-process the Tier I modification and PTC<br>☒ Administratively amend the Tier I permit to incorporate the PTC upon your request (IDAPA 58.01.01.209.05.a, b, or c)<br>☐ Tier I Permit<br>☐ Tier II Permit<br>☐ Tier II/Permit to Construct | | | |

## CERTIFICATION

In accordance with **IDAPA 58.01.01.123 (Rules for the Control of Air Pollution in Idaho)**, I certify based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

| | |
|---|---|
| 17. Responsible Official's Name/Title | William E. Copenspire General Manager<br>Consumer Products Division |

| | | | |
|---|---|---|---|
| 18. Responsible Official's Signature | William Copenspire | Date: | 8/30/11 |

19. ☒ Check here to indicate that you would like to review the draft permit prior to final issuance.

**DEQ AIR QUALITY PROGRAM**
1410 N. Hilton, Boise, ID 83706
For assistance, call the
**Air Permit Hotline – 1-877-5PERMIT**

Cover Sheet for Air Permit Application – Permit to Construct **Form CSPTC**

*Please see instructions on page 2 before filling out the form.*

## COMPANY NAME, FACILITY NAME, AND FACILITY ID NUMBER

| | | | |
|---|---|---|---|
| 1. Company Name | Clearwater Paper Corporation, Lewiston Facility | | |
| 2. Facility Name | Consumer Products | 3. Facility ID No. | 069-00001 |
| 4. Brief Project Description - One sentence or less | PTC application required by Consent Order E-2010.0019 executed on July 5th, 2011 to establish negotiated emissions limits. | | |

## PERMIT APPLICATION TYPE

5. ☐ New Source ☐ New Source at Existing Facility ☐ PTC for a Tier I Source Processed Pursuant to IDAPA 58.01.01.209.05.c
☐ Unpermitted Existing Source ☐ Facility Emissions Cap ☐ Modify Existing Source: Permit No.:_____ Date Issued:_____
☒ Required by Enforcement Action: Case No.:E-2010.0019

6. ☒ Minor PTC ☐ Major PTC

## FORMS INCLUDED

| Included | N/A | Forms | | DEQ Verify |
|---|---|---|---|---|
| ☒ | ☐ | Form CSPTC – Cover Sheet | | ☐ |
| ☒ | ☐ | Form GI – Facility Information | | ☐ |
| ☐ | ☒ | Form EU0 – Emissions Units General | | ☐ |
| ☐ | ☒ | Form EU1– Industrial Engine Information | Please specify number of EU1s attached: _____ | ☐ |
| ☐ | ☒ | Form EU2– Nonmetallic Mineral Processing Plants | Please specify number of EU2s attached: _____ | ☐ |
| ☐ | ☒ | Form EU3– Spray Paint Booth Information | Please specify number of EU3s attached: _____ | ☐ |
| ☐ | ☒ | Form EU4– Cooling Tower Information | Please specify number of EU3s attached: _____ | ☐ |
| ☐ | ☒ | Form EU5 – Boiler Information | Please specify number of EU4s attached: _____ | ☐ |
| ☐ | ☒ | Form CBP– Concrete Batch Plant | Please specify number of CBPs attached: _____ | ☐ |
| ☐ | ☒ | Form HMAP – Hot Mix Asphalt Plant | Please specify number of HMAPs attached: _____ | ☐ |
| ☐ | ☒ | PERF – Portable Equipment Relocation Form | | ☐ |
| ☐ | ☒ | Form AO – Afterburner/Oxidizer | | ☐ |
| ☐ | ☒ | Form CA – Carbon Adsorber | | ☐ |
| ☐ | ☒ | Form CYS – Cyclone Separator | | ☐ |
| ☐ | ☒ | Form ESP – Electrostatic Precipitator | | ☐ |
| ☐ | ☒ | Form BCE– Baghouses Control Equipment | | ☐ |
| ☐ | ☒ | Form SCE– Scrubbers Control Equipment | | ☐ |
| ☐ | ☒ | Form VSCE – Venturi Scrubber Control Equipment | | ☐ |
| ☐ | ☒ | Form CAM – Compliance Assurance Monitoring | | ☐ |
| ☒ | ☐ | Forms EI-– Emissions Inventory | | ☐ |
| ☐ | ☒ | PP – Plot Plan | | ☐ |
| ☐ | ☒ | Forms MI1 – MI4 – Modeling | (Excel workbook, all 4 worksheets) | ☐ |
| ☐ | ☒ | Form FRA – Federal Regulation Applicability | | ☐ |

| Summary of Baseline & Proposed Emission Inventories | | | |
|---|---|---|---|
| | VOC's (tons) | HAPs (tons) | TAPs |
| Baseline Period (2010) | 20.2 | 0.5 | Note worksheet |
| Proposed | 39.2 | 0.6 | No change from baseline period |

**LEWISTON CPD - Converting Inks**

*(Baseline - 2010)*

| MATERIAL | | DATA | TOTALS USAGE (tons) | TOTALS VOC (tons) | TOTALS TOTAL HAPS (tons) |
|---|---|---|---|---|---|
| **Black** | | | 1.10 | 0.0015 | 0.00 |
| | #'s/gallon: | 8.55 | | | |
| | VOC (w/o): | 0.14000% | | | |
| | Total HAP: | 0.00000% | | | |
| **Process Yellow** | | | 27.14 | 0.04 | 0.0000 |
| | #'s/gallon: | 8.52 | | | |
| | VOC (w/o): | 0.15000% | | | |
| | Total HAP: | 0.00000% | | | |
| **Dense Black** | | | 13.20 | 0.03 | 0.0000 |
| | #'s/gallon: | 8.69 | | | |
| | VOC (w/o): | 0.20000% | | | |
| | Total HAP: | 0.00000% | | | |
| **Magenta** | | | 29.63 | 0.13 | 0.0682 |
| | #'s/gallon: | 8.59 | | | |
| | VOC (w/o): | 0.43000% | | | |
| | Ethylene Gylcol: | 0.23000% | | | |
| | Total HAP: | 0.23000% | | | |
| **Process Cyan** | | | 31.25 | 0.05 | 0.0000 |
| | #'s/gallon: | 8.59 | | | |
| | VOC (w/o): | 0.15000% | | | |
| | Total HAP: | 0.00000% | | | |
| **Purple** | | | 2.20 | 0.01 | 0.0024 |
| | #'s/gallon: | 8.54 | | | |
| | VOC (w/o): | 0.28000% | | | |
| | Ethylene Gylcol: | 0.11000% | | | |
| | Total HAP: | 0.11000% | | | |
| **Green** | | | 6.69 | 0.01 | 0.0000 |
| | #'s/gallon: | 8.5 | | | |
| | VOC (w/o): | 0.16000% | | | |
| | Total HAP: | 0.00000% | | | |
| **Red** | | | 5.55 | 0.02 | 0.0056 |
| | #'s/gallon: | 8.53 | | | |
| | VOC (w/o): | 0.28000% | | | |
| | Ethylene Gylcol: | 0.10000% | | | |
| | Total HAP: | 0.10000% | | | |
| **Total Inks - #'s** | | 233,516 | | | |
| **Total Inks - tons** | | 117 | | | |
| **Total VOCs - #'s YTD** | | 551 | | | |
| **Total HAPs - #'s YTD** | | 152 | | | |
| **Total VOCs - tons YTD** | | 0.3 | | | |
| **Total HAPs - tons YTD** | | 0.1 | | | |

LEWISTON CPD - Converting Glues
*(Baseline - 2010)*

| MATERIAL | DATA | TOTALS USAGE (tons) | VOC (tons) | TOTAL HAPS (tons) |
|---|---|---|---|---|
| **Hot Melt** | | 34.1 | 0.03 | 0.0191 |
| #'s/gallon: | 9.00 | | | |
| VOC (w/o): <.1% | 0.10000% | | | |
| Total HAP: | 0.05600% | | | |
| Vinyl Acetate | 0.05600% | | | |
| **Lotion Hot Melt** | | 32.4 | 0.02 | 0.0230 |
| #'s/gallon: | 9.00 | | | |
| VOC (w/o): | 0.07300% | | | |
| Total HAP: | 0.07100% | | | |
| Vinyl Acetate | 0.07100% | | | |
| **HHT Transfer** | | 64.4 | 12.88 | 0.0001 |
| #'s/gallon: | 9.00 | | | |
| VOC (w/o): | 20.00020% | | | |
| Total HAP: | 0.00020% | | | |
| Formaldehyde | 0.00020% | | | |
| **HHT Laminating** | Bulk Totes | 178.0 | 0.30 | 0.2919 |
| #'s/gallon: | 9.00 | | | |
| VOC (w/o): | 0.17000% | | | |
| Total HAP: | 0.16400% | | | |
| Methanol | 0.16400% | | | |
| **HHT Tail Tie** | | 63.5 | 0.01 | 0.0014 |
| #'s/gallon: | 9.00 | | | |
| VOC (w/o): | 0.0125% | | | |
| Formaldehyde | 0.002% | | | |
| 1,3Dichloropropene | 0.00018% | | | |
| Dichelormethane | 0.00020% | | | |
| Total HAP: | 0.00218% | | | |
| **BRT Tail Tie** | | 62.5 | 2.01 | 0.0000 |
| #'s/gallon: | 9.00 | | | |
| VOC (w/o): | 3.2090% | | | |
| Total HAP: | 0.00002% | | | 0.0000 |
| Formaldehyde maybe 20ppm | 0.00002% | | | |
| **Core Winding** | | 39.6 | 0.16 | 0.0345 |
| #'s/gallon: | 9.00 | | | |
| VOC (w/o): | 0.4150% | | | |
| Vinyl Acetate | 0.0600% | | | |
| Methanol | 0.0080% | | | |
| Formaldehyde | 0.01400% | | | |
| Acetaldehyde | 0.00500% | | | |
| Total HAP: | 0.00087 | | | |
| **Slip Sheet** | | 3.5 | 0.01 | 0.0059 |
| #'s/gallon: | 9.00 | | | |
| VOC (w/o): | 0.21000% | | | |
| Total Hap: | 0.17210% | | | |
| Vinyl Acetate | 0.02900% | | | |
| Methanol | 0.13400% | | | |
| Formaldehyde | 0.00660% | | | |
| Acetaldehyde | 0.00250% | | | |
| **BRT Transfer** | | 0.0 | 0.0 | 0.0000 |
| #'s/gallon: | 9.00 | | | |
| VOC (w/o): | 7.08400% | | | |
| Total HAP: | 0.0040% | | | |
| Formaldehyde | 0.0040% | | | |
| **Transfer Glue** | | 70.8 | 2.19 | 0.0000 |
| #'s/gallon: | 9.00 | | | |
| VOC (w/o): | 3.09000% | | | |
| Total HAP: | | | | |
| **Hot Melt Glue** | | 4.7 | 0.00 | 0.0009 |
| #'s/gallon: | 9.00 | | | |
| VOC (w/o): <.1% | 0.10% | | | |
| Total HAP: | 0.01900% | | | |
| Vinyle Acetate | 0.01900% | | | |
| **BRT Transfer Glue** | | 52.8 | 0.00 | 0.0000 |
| #'s/gallon: | 8.80 | | | |
| VOC (w/o): | 0.00% | | | |
| Total HAP: | 0.00000% | | | |
| **BRT Transfer Glue** | | 4.5 | 0.01 | 0.0000 |
| #'s/gallon: | 8.90 | | | |
| VOC (w/o): | 0.13% | | | |
| Total HAP: | 0.00000% | | | |
| **BRT Tail Tie** | | 46.1 | 2.31 | 0.0000 |
| #'s/gallon: | 9.00 | | | |
| VOC (w/o): <.1% | 5.00600% | | | |
| Total HAP: | 0.00002% | | | |
| Formaldehyde maybe 20ppm | 0.00002% | | | |
| **Total Glues - #'s** | 1,313,718 | | | |
| **Total Glues - tons** | 657 | | | |
| **Total VOCs - #'s** | 39,863 | | | |
| **Total HAPs - #'s** | 754 | | | |
| **Total VOCs - tons** | 19.9 | | | |
| **Total HAPs - tons** | 0.4 | | | |

## LEWISTON CPD - Converting Inks

*(Proposed)*

| MATERIAL | | DATA | RM # | TOTALS USAGE (tons) | TOTALS VOC (tons) | TOTALS TOTAL HAPS (tons) |
|---|---|---|---|---|---|---|
| **Black** | | | RM#40022 | 3.00 | 0.02 | 0.00 |
| | #'s/gallon: | 8.55 | | | | |
| | VOC (w/o): | 0.50000% | | | | |
| | Total HAP: | 0.00000% | | | | |
| **Process Yellow** | | | RM#40072 | 30.00 | 0.15 | 0.00 |
| | #'s/gallon: | 8.52 | | | | |
| | VOC (w/o): | 0.50000% | | | | |
| | Total HAP: | 0.00000% | | | | |
| **Dense Black** | | | RM#40077 | 25.00 | 0.13 | 0.00 |
| | #'s/gallon: | 8.69 | | | | |
| | VOC (w/o): | 0.50000% | | | | |
| | Total HAP: | 0.00000% | | | | |
| **Magenta** | | | RM#40082 | 60.00 | 0.30 | 0.14 |
| | #'s/gallon: | 8.59 | | | | |
| | VOC (w/o): | 0.50000% | | | | |
| | Ethylene Gylcol: | 0.23000% | | | | |
| | Total HAP: | 0.23000% | | | | |
| **Process Cyan** | | | RM#40092 | 75.00 | 0.38 | 0.00 |
| | #'s/gallon: | 8.59 | | | | |
| | VOC (w/o): | 0.50000% | | | | |
| | Total HAP: | 0.00000% | | | | |
| **Purple** | | | RM#40074 | 5.00 | 0.03 | 0.01 |
| | #'s/gallon: | 8.54 | | | | |
| | VOC (w/o): | 0.50000% | | | | |
| | Ethylene Gylcol: | 0.11000% | | | | |
| | Total HAP: | 0.11000% | | | | |
| **Green** | | | RM#40075 | 15.00 | 0.08 | 0.00 |
| | #'s/gallon: | 8.5 | | | | |
| | VOC (w/o): | 0.50000% | | | | |
| | Total HAP: | 0.00000% | | | | |
| **Red** | | | RM#40063 | 15.00 | 0.08 | 0.02 |
| | #'s/gallon: | 8.53 | | | | |
| | VOC (w/o): | 0.50000% | | | | |
| | Ethylene Gylcol: | 0.10000% | | | | |
| | Total HAP: | 0.10000% | | | | |
| **Blue** | | | RM#40073 | 5.00 | 0.03 | 0.00 |
| | #'s/gallon: | 8.56 | | | | |
| | VOC (w/o): | 0.50000% | | | | |
| | Total HAP: | 0.00000% | | | | |
| **Total Inks - tons** | | 233 | | | | |
| **Total VOCs - tons YTD** | | 1.15 | | | | |
| **Total HAPs - tons YTD** | | 0.16 | | | | |

**LEWISTON CPD - Converting Glues**
*(Proposed)*

| MATERIAL | DATA | TOTALS USAGE (tons) | VOC (tons) | TOTAL HAPS (tons) |
|---|---|---|---|---|
| **Hot Melt** | | 50.0 | 1.00 | 0.0280 |
| #'s/gallon: | 9.00 | | | |
| VOC (w/o): <.1% | 2.00000% | | | |
| Total HAP: | 0.05600% | | | |
| Vinyl Acetate | 0.05600% | | | |
| **Lotion Hot Melt** | | 55.0 | 4.13 | 0.0391 |
| #'s/gallon: | 9.00 | | | |
| VOC (w/o): | 7.50000% | | | |
| Total HAP: | 0.07100% | | | |
| Vinyl Acetate | 0.07100% | | | |
| **HHT Transfer** | | 90.0 | 22.50 | 0.0002 |
| #'s/gallon: | 9.00 | | | |
| VOC (w/o): | 25.00000% | | | |
| Total HAP: | 0.00020% | | | |
| Formaldehyde | 0.00020% | | | |
| **HHT Laminating** | Bulk Totes | 200.0 | 4.00 | 0.3280 |
| #'s/gallon: | 9.00 | | | |
| VOC (w/o): | 2.00000% | | | |
| Total HAP: | 0.16400% | | | |
| Methanol | 0.16400% | | | |
| **HHT Tail Tie** | | 75.0 | 1.50 | 0.0016 |
| #'s/gallon: | 9.00 | | | |
| VOC (w/o): | 2.0000% | | | |
| Formaldehyde | 0.002% | | | |
| 1,3Dichloropropene | 0.00018% | | | |
| Dicholormethane | 0.00020% | | | |
| Total HAP: | 0.00218% | | | |
| **BRT Tail Tie** | | 75.0 | 3.75 | 0.0000 |
| #'s/gallon: | 9.00 | | | |
| VOC (w/o): | 5.0000% | | | |
| Total HAP: | 0.00002% | | | |
| Formaldehyde maybe 20ppm | 0.00002% | | | |
| **Core Winding** | | 50.0 | 1.00 | 0.0435 |
| #'s/gallon: | 9.00 | | | |
| VOC (w/o): | 2.0000% | | | |
| Vinyl Acetate | 0.0600% | | | |
| Methanol | 0.0080% | | | |
| Formaldehyde | 0.01400% | | | |
| Acetaldehyde | 0.00500% | | | |
| Total HAP: | 0.00087 | | | |
| **Slip Sheet** | | 10.0 | 0.20 | 0.0172 |
| #'s/gallon: | 9.00 | | | |
| VOC (w/o): | 2.00000% | | | |
| Total Hap: | 0.17210% | | | |
| Vinyl Acetate | 0.02900% | | | |
| Methanol | 0.13400% | | | |
| Formaldehyde | 0.00660% | | | |
| Acetaldehyde | 0.00250% | | | |
| **Total Glues - tons** | 605 | | | |
| **Total VOCs - tons** | 38.1 | | | |
| **Total HAPs - tons** | 0.4 | | | |

## *TAPS Analysis*

(Baseline - 2010)

| Chemical | Estimated Maximum Usage Rate #/hr | Ammonia (7664-41-7) w/o | Ammonia (7664-41-7) #'s/hr | Formaldehyde (50-00-0) w/o | Formaldehyde (50-00-0) #'s/hr | Ethylene glycol, vapor (107-21-1) w/o | Ethylene glycol, vapor (107-21-1) #'s/hr | Acetaldehyde (75-07-0) w/o | Acetaldehyde (75-07-0) #'s/hr | Methanol (67-56-1) w/o | Methanol (67-56-1) #'s/hr | Vinyl acetate (108-05-04) w/o | Vinyl acetate (108-05-04) #'s/hr |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Black** | 1 | 0.030000% | 3.00E-04 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 |
| **Process Yellow** | 25 | 0.030000% | 7.50E-03 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 |
| **Dense Black** | 12 | 0.030000% | 3.60E-03 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 |
| **Magenta** | 27 | 0.030000% | 8.10E-03 | | 0.00E+00 | 0.230000% | 6.21E-02 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 |
| **Process Cyan** | 29 | 0.030000% | 8.70E-03 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 |
| **Purple** | 1 | 0.010000% | 1.00E-04 | | 0.00E+00 | 0.110000% | 1.10E-03 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 |
| **Green** | 5 | 0.010000% | 5.00E-04 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 |
| **Red** | 5 | 0.040000% | 2.00E-03 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 |
| **Blue** | 1 | 0.040000% | 4.00E-04 | | 0.00E+00 | 0.100000% | 1.00E-03 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 |
| **Swift ®therm3H010 Hot Melt** | 9 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | 0.056000% | 5.04E-03 |
| **Swift ®therm82516 Lotion Hot Melt** | 8 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | 0.071000% | 5.68E-03 |
| **Swift 48424 1,2 -N HHT Transfer** | 16 | | 0.00E+00 | 0.000003% | 4.80E-07 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 |
| **Swift 48574 HHT Laminating** | 45 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | 0.164000% | 7.38E-02 | | 0.00E+00 |
| **Swift®tak 48628 HHT Tail Tie** | 16 | | 0.00E+00 | 0.000053% | 8.48E-06 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 |
| **Swift®tak RP339 BRT Tail Tie** | 16 | | 0.00E+00 | 0.000020% | 3.20E-06 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 |
| **Swift RP299 Core Winding** | 10 | | 0.00E+00 | 0.013000% | 1.30E-03 | | 0.00E+00 | 0.005000% | 5.00E-04 | 0.008000% | 8.00E-04 | 0.060000% | 6.00E-03 |
| **Swift 17003-9P Slip Sheet** | 1 | | 0.00E+00 | 0.000020% | 2.00E-07 | | 0.00E+00 | 0.002500% | 2.50E-05 | 0.134000% | 1.34E-03 | 0.029000% | 2.90E-04 |
| **Swifttak 48503 2N** | 1 | | 0.00E+00 | 0.004000% | 4.00E-05 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 |
| **Swift®tak 48723** | 18 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 |
| **Swift®therm 89056** | 1 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | 0.019000% | 1.90E-04 |
| **HBFullerTT1002 LB** | 13 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 |
| **HBFullerTT5000B** | 1 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 |
| **Swift®tak 2R952-2N** | 12 | | 0.00E+00 | 0.000020% | 2.40E-06 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 |
| **IDAPA EL SCREENING VALUE (#'s/hr)** | | | 1.2 | | 5.10E-04 | | 8.46E-01 | | 3.00E-03 | | 1.73E+01 | | No EL |

Notes:

1. Maximum usage rate for adhesives is estimated as the peak hourly consumption rate based on 2010 annual consumption rates and a 90% equipment utilization rate.
2. Maximum usage rate for inks is estimated as the peak hourly consumption rate based on 2010 annual consumption and a 25% utilization rate.
3. TAPs concentrations based on vendor MSDS's, technical data and/or analytical results.
4. Note that RP299 estimated maximum hourly usage is broken down approximately as follows:

| Machine | RP299 Usage | Equipment Installation Date |
|---|---|---|
| BRT4 | 6 #'s/hr | 1979/80 |
| Four (4) core machines associated with BRT and HHT lines | 4 #'s/hr | 1978 |

(Proposed)

| Chemical | Estimated Maximum Usage Rate #/hr | Ammonia (7664-41-7) w/o | Ammonia (7664-41-7) #'s/hr | Formaldehyde (50-00-0) w/o | Formaldehyde (50-00-0) #'s/hr | Ethylene glycol vapor (107-21-1) w/o | Ethylene glycol vapor (107-21-1) #'s/hr | Acetaldehyde (75-07-0) w/o | Acetaldehyde (75-07-0) #'s/hr | Methanol (67-56-1) w/o | Methanol (67-56-1) #'s/hr | Vinyl acetate (108-05-04) w/o | Vinyl acetate (108-05-04) #'s/hr |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Black** | 1 | 0.030000% | 3.00E-04 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 |
| **Process Yellow** | 25 | 0.030000% | 7.50E-03 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 |
| **Dense Black** | 12 | 0.030000% | 3.60E-03 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 |
| **Magenta** | 27 | 0.030000% | 8.10E-03 | | 0.00E+00 | 0.230000% | 6.21E-02 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 |
| **Process Cyan** | 29 | 0.030000% | 8.70E-03 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 |
| **Purple** | 1 | 0.010000% | 1.00E-04 | | 0.00E+00 | 0.110000% | 1.10E-03 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 |
| **Green** | 5 | 0.010000% | 5.00E-04 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 |
| **Red** | 5 | 0.040000% | 2.00E-03 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 |
| **Blue** | 1 | 0.040000% | 4.00E-04 | | 0.00E+00 | 0.100000% | 1.00E-03 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 |
| **Hot Melt** | 9 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | 0.056000% | 5.04E-03 |
| **Lotion Hot Melt** | 8 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | 0.071000% | 5.68E-03 |
| **HHT Transfer** | 16 | | 0.00E+00 | 0.000003% | 4.80E-07 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 |
| **HHT Laminating** | 45 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | 0.164000% | 7.38E-02 | | 0.00E+00 |
| **HHT Tail Tie** | 16 | | 0.00E+00 | 0.000053% | 8.48E-06 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 |
| **BRT Tail Tie** | 16 | | 0.00E+00 | 0.000020% | 3.20E-06 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 | | 0.00E+00 |
| **Core Winding** | 10 | | 0.00E+00 | 0.013000% | 1.30E-03 | | 0.00E+00 | 0.005000% | 5.00E-04 | 0.008000% | 8.00E-04 | 0.060000% | 6.00E-03 |
| **Slip Sheet** | 1 | | 0.00E+00 | 0.000020% | 2.00E-07 | | 0.00E+00 | 0.002500% | 2.50E-05 | 0.134000% | 1.34E-03 | 0.029000% | 2.90E-04 |
| **IDAPA EL SCREENING VALUE (#'s/hr)** | | | 1.2 | | 5.10E-04 | | 8.46E-01 | | 3.00E-03 | | 1.73E+01 | | No EL |

Notes:

1. Maximum usage rate for adhesives is estimated as the peak hourly consumption rate based on 2010 annual consumption rates and a 90% equipment utilization rate.
2. Maximum usage rate for inks is estimated as the peak hourly consumption rate based on 2010 annual consumption and a 25% utilization rate.
3. TAPs concentrations based on vendor MSDS's, technical data and/or analytical results.
4. Note that core adhesive is estimated maximum hourly usage is broken down approximately as follows:

| Machine | Core Usage | Equipment Installation Date |
|---|---|---|
| BRT4 | 6 #'s/hr | 1979/80 |
| Four (4) core machines associated with BRT and HHT lines | 4 #'s/hr | 1978 |