

AIR EMISSION PERMIT NO. 12300718- 002

IS ISSUED TO

Hood Packaging Corporation

HOOD PACKAGING CORP - ARDEN HILLS

1887 Gateway Boulevard
Arden Hills, Ramsey County, MN 55112

The emission units, control equipment and emission stacks at the stationary source authorized in this permit are as described in the following permit application(s):

Permit Type	Application Date
Total Facility Oper. Permit - Reissuance	09/28/2004

This permit reissuance authorizes the Permittee to operate the stationary source at the address listed above unless otherwise noted in Table A. The Permittee must comply with all the conditions of the permit. Any changes or modifications to the stationary source must be performed in compliance with Minn. R. 7007.1150 to 7007.1500. Terms used in the permit are as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

Permit Type: Federal; Pt 70/Limits to Avoid NSR

Issue Date: November 7, 2006

Expiration: November 7, 2011
All Title I Conditions do not expire.

Richard J. Sandberg, Manager
Air Quality Permits Section
Industrial Division

for Brad Moore
Acting Commissioner
Minnesota Pollution Control Agency

TABLE OF CONTENTS

Notice to the Permittee

Permit Shield

Facility Description

Table A: Limits and Other Requirements

Table B: Submittals

Table C: Not used in this permit

Appendices: Attached and Referenced in Table A

NOTICE TO THE PERMITTEE:

Your stationary source may be subject to the requirements of the Minnesota Pollution Control Agency's (MPCA) solid waste, hazardous waste, and water quality programs. If you wish to obtain information on these programs, including information on obtaining any required permits, please contact the MPCA general information number at:

Metro Area	(651) 296-6300
Outside Metro Area	1-800-657-3864
TTY	(651) 282-5332

The rules governing these programs are contained in Minn. R. chs. 7000-7105. Written questions may be sent to: Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194.

Questions about this air emission permit or about air quality requirements can also be directed to the telephone numbers and address listed above.

PERMIT SHIELD:

Subject to the limitations in Minn. R. 7007.1800, compliance with the conditions of this permit shall be deemed compliance with the specific provision of the applicable requirement identified in the permit as the basis of each condition. Subject to the limitations of Minn. R. 7007.1800 and 7017.0100, subp. 2, notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

FACILITY DESCRIPTION:

Hood Packaging Corporation produces printed plastic bags and sheets. Rolls of plastic are printed on with one of the three flexographic printing presses at the facility. The sources of air emissions at the facility are the printing presses and their associated dryers. A catalytic oxidizer controls volatile organic compound emissions from all three of the presses at the facility. The facility has removed one flexographic printing press and six bag forming lines and three stacks. Two tanks were added to the Facility Description that were not included in previous permitting actions. This permit action is a permit reissuance.

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-1

11/07/06

Facility Name: Hood Packaging Corp - Arden Hills

Permit Number: 12300718 - 002

Table A contains limits and other requirements with which your facility must comply. The limits are located in the first column of the table (What To do). The limits can be emission limits or operational limits. This column also contains the actions that you must take and the records you must keep to show that you are complying with the limits. The second column of Table A (Why to do it) lists the regulatory basis for these limits. Appendices included as conditions of your permit are listed in Table A under total facility requirements.

Subject Item:**Total Facility**

What to do	Why to do it
SOURCE-SPECIFIC REQUIREMENTS	hdr
Volatile Organic Compounds: less than or equal to 221.7 tons/year using 12-month Rolling Sum	Title I Condition: To avoid major source classification under 40 CFR Section 52.21 and Minn. R. 7007.3000
Recordkeeping: by the 15th day of each month, calculate and record the VOC emission calculations for the previous month.	Title I Condition: To avoid major source classification under 40 CFR Section 52.21 and Minn. R. 7007.3000
Recordkeeping: by the 15th day of each month, calculate and record the VOC emission calculations for the previous 12-month period (12-month rolling sum).	Title I Condition: To avoid major source classification under 40 CFR Section 52.21 and Minn. R. 7007.3000
Recordkeeping: VOC emissions from the facility shall be calculated monthly by: 1. determining the VOC usage and then, 2. taking the control efficiency into consideration for the emission units which are controlled. If the control equipment is bypassed or not operating as required by this permit, a control efficiency of 0% shall be used for those periods.	Title I Condition: To avoid major source classification under 40 CFR Section 52.21 and Minn. R. 7007.3000
Recordkeeping: 1) the total facility VOC use for each month shall be determined as follows: $U = U_i + U_s$ $U_i = 0.70(V_i)$ $U_s = 1(V1s + A_s - V2s)$ where, U = total facility VOC use per month (lb VOC/mo) U _i = total facility VOC use per month from inks (lb VOC/mo) U _s = total facility VOC use per month from solvents (lb VOC/mo) 0.70 = worst case VOC content of the inks (wt %) V _i = total volume of inks sent to the four presses for the month (lb ink) 1 = VOC content of the solvents (100 %) V1s = total volume of solvents at the facility at the start of the month (lb solvent) A _s = all additions of solvents received for the month (lb solvent) V2s = total volume of solvents at the facility at the end of the month (lb solvent)	Minn. R. 7007.0800, subp. 5
Recordkeeping: 2) the VOC emissions for the facility shall be determined each month as follows: $E = (1-CE)U(P2 + P3 + P4)$ $P2 = EF2(h2)$ $P3 = EF3(h3)$ $P4 = EF4(h4)$ where, E = total facility VOC emissions, reflecting control equipment operation P2 = potential emissions of press number 2 (lb VOC/mo) P3 = potential emissions of press number 3 (lb VOC/mo) P4 = potential emissions of press number 4 (lb VOC/mo) U = total facility VOC use (lb VOC/mo), see previous requirement CE = control efficiency of the catalytic oxidizer (61%) (continued)	Minn. R. 7007.0800, subp. 5
Recordkeeping: 2) continued EF2 = press specific emission factor for press 2 (39 lb VOC/hr) EF3 = press specific emission factor for press 3 (45 lb VOC/hr) EF4 = press specific emission factor for press 4 (52 lb VOC/hr) h2 = hours press 2 ran for the month (hr/mo) h3 = hours press 3 ran for the month (hr/mo) h4 = hours press 4 ran for the month (hr/mo)	Minn. R. 7007.0800, subp. 5
Recordkeeping: During the first week of each calendar month, the Permittee shall 1) take and record the reading from the hour meter on each press; 2) calculate the number of hours each press was operated for the previous month.	Minn. R. 7007.0800, subp. 5
OPERATIONAL REQUIREMENTS	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-2**

11/07/06

Facility Name: Hood Packaging Corp - Arden Hills

Permit Number: 12300718 - 002

The Permittee shall limit the operation of emission units to a total of 6390 hours per year based on a 12-month rolling sum.	Title I Condition: To avoid major source classification under 40 CFR Section 52.21 and Minn. R. 7007.3000
Daily Recordkeeping. On each day of operation, the Permittee shall record the number of operating hours for each emission unit.	Title I Condition: To avoid major source classification under 40 CFR Section 52.21 and Minn. R. 7007.3000
Monthly Recordkeeping - Operating Hours. By the 15th of the month, the Permittee shall calculate and record the following: 1) The total number of operating hours for each emission unit for the previous calendar month using the daily operating hour records. 2) The 12 month rolling sum of the operating hours for each emission unit for the previous 12 month period by summing the monthly operating hours data for the previous 12 months.	Minn. R. 7007.0800, subp. 4 & 5
Operation and Maintenance Plan: Retain at the stationary source an operation and maintenance plan for all air pollution control equipment. At a minimum, the O & M plan shall identify all air pollution control equipment and control practices and shall include a preventative maintenance program for the equipment and practices, a description of (the minimum but not necessarily the only) corrective actions to be taken to restore the equipment and practices to proper operation to meet applicable permit conditions, a description of the employee training program for proper operation and maintenance of the control equipment and practices, and the records kept to demonstrate plan implementation.	Minn. R. 7007.0800, subp. 14 & Minn. R. 7007.0800, subp. 16(J)
Operation Changes: In any shutdown, breakdown, or deviation the Permittee shall immediately take all practical steps to modify operations to reduce the emission of any regulated air pollutant. The Commissioner may require feasible and practical modifications in the operation to reduce emissions of air pollutants. No emissions units that have an unreasonable shutdown or breakdown frequency of process or control equipment shall be permitted to operate.	Minn. R. 7019.1000, subp. 4
Air Pollution Control Equipment: Operate all pollution control equipment whenever the corresponding process equipment and emission units are operated, unless otherwise noted in Table A.	Minn. R. 7007.0800, subps. 2 & 16(J)
Fugitive Emissions: Do not cause or permit the handling, use, transporting, or storage of any material in a manner which may allow avoidable amounts of particulate matter to become airborne. Comply with all other requirements listed in Minn. R. 7011.0150.	Minn. R. 7011.0150
Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. R. 7030.0010 - 7030.0080
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
Inspections: The Permittee shall comply with the inspection procedures and requirements as found in Minn. R. 7007.0800, subp. 9(A).	Minn. R. 7007.0800, subp. 9(A)
PERFORMANCE TESTING	hdr
Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A and/or B.	Minn. R. ch. 7017
Limits set as a result of a performance test (conducted before or after permit issuance) apply until superseded as specified by Minn. R. 7017.2025 following formal review of a subsequent performance test on the same unit and completion of permit reopening and reissuance. If limits serve to cause more stringent operating conditions, resulting changes to facility operation need to be made immediately. If limits serve to relax current operating conditions, resulting changes to facility operation must not be made prior to issuance of permit amendment with new limit incorporated.	Minn. R. 7017.2025
MONITORING REQUIREMENTS	hdr
The Permittee shall comply with National Primary and Secondary Ambient Air Quality Standards, 40 CFR pt. 50, and the Minnesota Ambient Air Quality Standards, Minn. R. 7009.0010 to 7009.0080. Compliance shall be demonstrated upon written request by the MPCA.	40 CFR pt. 50; Minn. Stat. Section 116.07, subds. 4a & 9; Minn. R. 7007.0100, subps. 7A, 7L & 7M; Minn. R. 7007.0800, subps. 1, 2 & 4; Minn. R. 7009.0010-7009.0080.
Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment.	Minn. R. 7007.0800, subp. 4(D)
Operation of Monitoring Equipment: Unless otherwise noted in Tables A and/or B, monitoring a process or control equipment connected to that process is not necessary during periods when the process is shutdown, or during checks of the monitoring systems, such as calibration checks and zero and span adjustments. If monitoring records are required, they should reflect any such periods of process shutdown or checks of the monitoring system.	Minn. R. 7007.0800, subp. 4(D)
Circumvention: Do not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a federal or state air pollution control rule, without reducing the total amount of pollutant emitted.	Minn. R. 7011.0020

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-3**

11/07/06

Facility Name: Hood Packaging Corp - Arden Hills

Permit Number: 12300718 - 002

RECORDKEEPING	hdr
Recordkeeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007. 1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350 subp. 2), including records of the emissions resulting from those changes.	Minn. R. 7007. 0800, subp. 5(B)
Recordkeeping: Retain all records at the stationary source for a period of five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A).	Minn. R. 7007.0800, subp. 5(C)
REPORTING/SUBMITTALS	hdr
Shutdown Notifications: Notify the Commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the owner or operator does not have advance knowledge of the shutdown, notification shall be made to the Commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 3. At the time of notification, the owner or operator shall inform the Commissioner of the cause of the shutdown and the estimated duration. The owner or operator shall notify the Commissioner when the shutdown is over.	Minn. R. 7019.1000, subp. 3
Breakdown Notifications: Notify the Commissioner within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 2. At the time of notification or as soon as possible thereafter, the owner or operator shall inform the Commissioner of the cause of the breakdown and the estimated duration. The owner or operator shall notify the Commissioner when the breakdown is over.	Minn. R. 7019.1000, subp. 2
Notification of Deviations Endangering Human Health or the Environment: As soon as possible after discovery, notify the Commissioner or the state duty officer, either orally or by facsimile, of any deviation from permit conditions which could endanger human health or the environment.	Minn. R. 7019.1000, subp. 1
Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description: 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.	Minn. R. 7019.1000, subp. 1
Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.	Minn. R. 7007.1150 through Minn. R. 7007.1500
Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H).	Minn. R. 7007.1400, subp. 1(H)
Emission Inventory Report: due on or before April 1 of each calendar year following permit issuance. To be submitted on a form approved by the Commissioner.	Minn. R. 7019.3000 - Minn. R. 7019.3010
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 - Minn. R. 7002.0095

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-4**

11/07/06

Facility Name: Hood Packaging Corp - Arden Hills

Permit Number: 12300718 - 002

Subject Item: GP 001 Presses**Associated Items:** EU 002 Press 10DF8CNC

EU 003 Press 34DFCNC

EU 004 Press 34DF8CNC

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. The PTE for PM is 0.00037 grains per dry standard cubic foot. This is so much less than the limit, no periodic monitoring will be required.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20.0 percent opacity . Particulate emissions from this unit are expected to be very low and therefore no periodic monitoring is required.	Minn. R. 7011.0715, subp. 1(B)

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-5**

11/07/06

Facility Name: Hood Packaging Corp - Arden Hills

Permit Number: 12300718 - 002

Subject Item: CE 001 Catalytic Afterburner w/Heat Exchanger**Associated Items:** EU 002 Press 10DF8CNC

EU 003 Press 34DFCNC

EU 004 Press 34DF8CNC

What to do	Why to do it
EMISSION LIMITS	hdr
Volatile Organic Compounds: greater than or equal to 64 percent capture efficiency demonstrated during the most recent performance test	Title I Condition: To avoid major source classification under 40 CFR Section 52.21 and Minn. R. 7007.3000
Volatile Organic Compounds: greater than or equal to 95 percent destruction efficiency demonstrated during the most recent performance test.	Title I Condition: To avoid major source classification under 40 CFR Section 52.21 and Minn. R. 7007.3000
General: Route all emissions from EU 002, EU 003, and EU 004 to the catalytic oxidizer at all times except during emergencies.	Title I Condition: To avoid major source classification under 40 CFR Section 52.21 and Minn. R. 7007.3000
TEMPERATURE AND MONITORING REQUIRMENTS	hdr
Temperature: greater than or equal to 549 degrees F as measured at the inlet to, and outlet of, the catalyst bed whenever in operation until a new minimum is set pursuant to Minn. R. 7017.2025, subp. 3, based on the average temperature recorded during the most recent performance test where compliance for VOC emissions was demonstrated. If at any time the measured inlet temperature drops below the minimum temperature requirement established during the most recent performance test, calculate 3-hour average inlet temperatures for each 3-hour block during the 12 hours immediately prior to and the 12 hours immediately following the time that the inlet temperature dropped below the minimum temperature requirement. If any of the calculated 3-hour average inlet temperatures is below the minimum temperature requirement, this incident shall be considered a deviation, reportable as described elsewhere in this permit.	Title I Condition: To avoid major source classification under 40 CFR Section 52.21 and Minn. R. 7007.3000
Monitoring: The Permittee shall install the necessary monitoring equipment for measuring the temperature as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the process is in operation.	Title I Condition: To avoid major source classification under 40 CFR Section 52.21 and Minn. R. 7007.3000
Monitoring QA/QC: Conduct a test of the inlet and outlet temperature monitors at least annually. The temperature monitor must be within +/- 5 degrees Fahrenheit of the reference temperature monitor. Verify the accuracy of the temperature monitor with a reference temperature monitor (traceable to National Institute of Standards and Technology (NIST) standards or an independent temperature measurement device dedicated for this purpose). During accuracy checking, the probe of the reference device shall be placed as close physically practicable to the location as that of the temperature monitor being tested, such that representative temperature measurements are obtained.	Minn. R. 7007.0800, subp. 4
STACK TESTING REQUIREMENTS	hdr
Performance Notifications and Submittals: Performance Tests are due as outlined in Table A of the permit. Performance Test Notification (written): due 30 days before each Performance Test to measure VOC capture and destruction efficiency Performance Test Plan: due 30 days before each Performance Test to measure VOC capture and destruction efficiency Performance Test Pre-test Meeting: due 7 days before each Performance Test to measure VOC capture and destruction efficiency Performance Test Report: due 45 days after each Performance Test to measure VOC capture and destruction efficiency Performance Test Report - Microfiche Copy: due 105 days after each Performance Test to measure VOC capture and destruction efficiency	Minn. R. 7017.2030, subp. 1-4; Minn. R. 7017.2018 and Minn. R. 7017.2035, subp. 1-2
Performance Test: due before end of each 60 months starting 09/24/2001 to measure VOC emissions.	Minn. R. 7017.2020, subp. 1
CATALYST SAMPLING AND ANALYSIS	hdr
Sample Analysis: due before the end of every two calendar years beginning in 2006. The Permittee must send a representative sample of the catalyst to a laboratory, as designated by the manufacturer, to test the catalyst's destruction efficiency. For test results showing a destruction efficiency of less than 95% follow the corrective actions contained in the catalytic oxidizer operation and maintenance plan. The results shall be kept at the site for a period of five years from the date of the analysis.	Title I Condition: To avoid major source classification under 40 CFR Section 52.21 and Minn. R. 7007.3000

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-6**

11/07/06

Facility Name: Hood Packaging Corp - Arden Hills

Permit Number: 12300718 - 002

The Permittee shall prepare and maintain an Operation & Maintenance Plan for the catalytic oxidizer, to include quarterly and annual inspections and reports. Include in the plan corrective actions to be taken if the destruction efficiency of the catalyst is less than 95%, as indicated by the testing of a representative sample of the catalyst. This O and M plan must also contain the details of what "a representative sample" of the catalyst is.	Title I Condition: To avoid major source classification under 40 CFR Section 52.21 and Minn. R. 7007.3000
Quarterly Inspections: Once per calendar quarter, the Permittee shall complete a quarterly inspection form following visual inspection of the following components of the oxidizer: duct work, access doors, fan and motor assembly, burner, exhaust stack, observation port, temperature recording device, and inspection of entire perimeter for damage or extreme wear. If a problem is noted during an inspection, the Permittee shall follow corrective actions as specified in the Operation and Maintenance Plan. The inspection records shall be kept for a period of five years from the date of inspection at the source.	Title I Condition: To avoid major source classification under 40 CFR Section 52.21 and Minn. R. 7007.3000
Annual Inspections: Once annually, during oxidizer shutdown, the Permittee shall record inspection of the oxidizer components as described under the annual inspection guidelines in the equipment Operation and Maintenance Manual provided by the manufacturer. If a problem is noted during an inspection, the Permittee shall follow corrective actions as specified in the Operation and Maintenance Plan. The inspection records shall be kept at the source for a period of five years from the date of the inspection.	Title I Condition: To avoid major source classification under 40 CFR Section 52.21 and Minn. R. 7007.3000
RECORDKEEPING/REPORTING REQUIREMENTS	hdr
Control Equipment Bypasses: Record the date and time of each catalytic oxidizer bypass period.	Title I Condition: To avoid major source classification under 40 CFR Section 52.21 and Minn. R. 7007.3000
Control Equipment Bypasses: Report all catalytic oxidizer bypasses in the facility's semiannual deviation report.	Minn. R. 7007.0800, subp. 6
Daily Monitoring: The Permittee shall physically verify the operation of the temperature recording device at least once each operating day to verify that it is working and recording properly. The Permittee shall maintain a written record of the daily verifications.	Minn. R. 7007.0800, subp. 4 and 5
Recordkeeping: The Permittee shall maintain either a continuous hard copy readout of the inlet and outlet temperatures, or maintain a hard copy of manual readings taken at least every 15 minutes or maintain an electronic file of the temperature readings.	Title I Condition: To avoid major source classification under 40 CFR Section 52.21 and Minn. R. 7007.3000
Recordkeeping: The Permittee shall maintain records of the catalyst bed temperatures and catalyst destruction efficiency tests at the facility for a period of 5 years from the time the records were created.	Title I Condition: To avoid major source classification under 40 CFR Section 52.21 and Minn. R. 7007.3000

TABLE B: SUBMITTALS**B-1** 11/07/06

Facility Name: Hood Packaging Corp - Arden Hills
Permit Number: 12300718 - 002

Table B lists most of the submittals required by this permit. Please note that some submittal requirements may appear in Table A or, if applicable, within a compliance schedule located in Table C. Table B is divided into two sections in order to separately list one-time only and recurrent submittal requirements.

Each submittal must be postmarked or received by the date specified in the applicable Table. Those submittals required by parts 7007.0100 to 7007.1850 must be certified by a responsible official, defined in Minn. R. 7007.0100, subp. 21. Other submittals shall be certified as appropriate if certification is required by an applicable rule or permit condition.

Send any application for a permit or permit amendment to:

AQ Permit Technical Advisor
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

Also, where required by an applicable rule or permit condition, send to the Permit Technical Advisor notices of:

- accumulated insignificant activities,
- installation of control equipment,
- replacement of an emissions unit, and
- changes that contravene a permit term.

Unless another person is identified in the applicable Table, send all other submittals to:

AQ Compliance Tracking Coordinator
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

Send submittals that are required to be submitted to the U.S. EPA regional office to:

Mr. George Czerniak
Air and Radiation Branch
EPA Region V
77 West Jackson Boulevard
Chicago, Illinois 60604

Send submittals that are required by the Acid Rain Program to:

U.S. Environmental Protection Agency
Clean Air Markets Division
1200 Pennsylvania Avenue NW (6204N)
Washington, D.C. 20460

TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS

Facility Name: Hood Packaging Corp - Arden Hills
Permit Number: 12300718 - 002

What to send	When to send	Portion of Facility Affected
Application for Permit Reissuance	due 180 days before expiration of Existing Permit	Total Facility

TABLE B: RECURRENT SUBMITTALS**B-3** 11/07/06

Facility Name: Hood Packaging Corp - Arden Hills

Permit Number: 12300718 - 002

What to send	When to send	Portion of Facility Affected
Semiannual Deviations Report	due 30 days after end of each calendar half-year starting 08/30/2000. The first semiannual report submitted by the Permittee shall cover the calendar half-year in which the permit is issued. The first report of each calendar year covers January 1 - June 30. The second report of each calendar year covers July 1 - December 31. If no deviations have occurred, the Permittee shall submit the report stating no deviations.	Total Facility
Compliance Certification	due 30 days after end of each calendar year starting 08/30/2000 (for the previous calendar year). To be submitted on a form approved by the Commissioner, both to the Commissioner, and to the U.S. EPA regional office in Chicago. This report covers all deviations experienced during the calendar year.	Total Facility

APPENDIX MATERIAL

Facility Name:Hood Packaging Corp - Arden Hills

Permit Number: 12300718-002

TECHNICAL SUPPORT DOCUMENT
For
AIR EMISSION PERMIT NO. 12300718-002

This Technical Support Document (TSD) is for all the interested parties of the permit. The purpose of this document is to set forth the legal and factual basis for the permit conditions, including references to the applicable statutory or regulatory provisions.

1. General Information

1.1. Applicant and Stationary Source Location:

Owner and Operator Address and Phone Number	Facility Address (SIC Code: 3081/2759)
Southern Bag Corporation P.O. Box 2310 Madison, MS 39130-2310	Hood Packaging Corporation 1887 Gateway Boulevard Arden Hills, MN 55112 Ramsey County Mr. Gary Hilliard, (651) 636-2500

1.2. Description of the facility

Hood Packaging Corporation produces printed plastic bags and sheets. Rolls of plastic are printed on with one of the three flexographic printing presses at the facility. The sources of air emissions at the facility are the three printing presses and their associated dryers.

The permit requires the facility to track its inventory of inks and solvents so that it can calculate its Volatile Organic Compound (VOC) emissions based on a mass balance approach.

1.3. Description of any changes allowed with this permit issuance

The facility has removed one flexographic printing press and six bag forming lines and three stacks. Two tanks were added to the facility description that were not included in previous permitting actions. This permit action is a permit reissuance.

1.4. Facility Emissions:

Table 1. Total Facility Potential to Emit Summary:

EU CE #	SV #	Emission Unit Description	PM tpy	PM ₁₀ tpy	SO ₂ tpy	NO _x tpy	CO tpy	VOC tpy	Pb tpy	Single HAP tpy	All HAPs tpy
EU 002	002	Press 10DF8CNC	<1	<1	0.0	0.15	<1	63.5	0.0	0.0	0.0
EU 003	002	Press 34DFCNC	<1	<1	0.0	0.68	<1	73.5	0.0	0.0	0.0
EU 004	002	Press 34DF8CNC	<1	<1	0.0	1.02	<1	84.7	0.0	0.0	0.0
CE 001	002	Catalytic Oxidizer	<1	<1	0.0	2.37	<1	0.0	0.0	0.0	0.0

Total Facility	PM tpy	PM ₁₀ tpy	SO ₂ tpy	NO _x tpy	CO tpy	VOC tpy	Pb tpy	Single HAP tpy	All HAPs tpy
Limited Potential Emissions	0.1	0.1	0.0	2.25	0.32	221.7	0.0	0.0	0.0
Actual Emissions	-	-	-	-	-	83.7	-	-	-

Table 2. Facility(TF) and Permit Classification

Classification (list pollutant)	Major/Affected Source	*Synthetic Minor	*Minor
PSD		VOC	PM, PM ₁₀ , SO _x , NO _x , CO
NAAR	None	None	None
Part 70 Permit Program	VOC		PM ₁₀ , SO _x , NO _x , CO

* Refers to potential emissions that are less than those specified as major by 40 CFR § 52.21, 40 CFR pt. 51 Appendix S, and 40 CFR pt. 70.

2. Regulatory and/or Statutory Basis

Summary Regulatory and/or Statutory Basis of the Emission or operational Limit

Regulatory Overview of Facility

FC or CE	Applicable Regulations	Comments:
FC	40 CFR § 52.21	Title I Condition: VOC emissions limited to 221.7 tons per year and hours of operation have been limited, calculated using 12-month Rolling Sum
CE 001	40 CFR § 52.21	Title I Condition: Capture and destruction efficiency for VOC emissions; Temperature and Monitoring requirements; Recordkeeping/Reporting requirements.

FC = Facility, CE = Control Equipment

3. Technical Information

The emission units at this facility are subject to Standards of Performance for Industrial Process Equipment. However, the particulate emissions from these units are very insignificant and hence periodic monitoring for PM is not incorporated into this permit.

In the original permit the Direct Heating Equipment rule, Minn. R. 7011.1610 was applied to the Catalytic Oxidizer (CE001). This rule was not intended to apply to oxidizers that are destroying emissions from a piece of process equipment. This rule has been removed from the permit and the Industrial Process Equipment rule governs particulate emissions from the Presses.

4. Conclusion

Based on the information provided by the Hood Flexible Packaging, the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 12300718-002, and this TSD, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Staff Members on Permit Team: Greg Kvaal

Attachment: CD-01 Forms