

NORTH CAROLINA DIVISION OF AIR QUALITY <p style="text-align: center;">Air Permit Review</p>		Region: Mooresville Regional Office County: Lincoln NC Facility ID: 5500089 Inspector's Name: Jim Hafner Date of Last Inspection: 07/14/2004 Compliance Code: C/In Compliance With Procedural Reqr	
Permit Issue Date:		Permit Applicability (this application only) SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Added stipulation Other: Permit Renewal	
Facility Data Applicant (Facility's Name): CPI Packaging, Inc. Facility Address: CPI Packaging, Inc. 536 North Generals Boulevard Lincolnton, NC 28092 SIC: 3086 / Plastics Foam Products NAICS: 32614 / Polystyrene Foam Product Manufacturing Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V		Application Data Application Number: 5500089.05A Date Received: 02/02/2005 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 07362/T09 Existing Permit Issue Date: 03/29/2005 Existing Permit Expiration Date: 10/31/2005	
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Review Engineer: Mike Benson Review Engineer's Signature: Date:		Comments / Recommendations: Issue 07362/T10 Permit Issue Date: Permit Expiration Date:	

I. Introduction:

CPI Packaging Inc., located in Lincolnton, North Carolina currently holds Title V Permit No. 07362T09, with an expiration date of October 31, 2005. The application was submitted to apply for renewal of the existing Title V Air Permit. This renewal permit will be issued as Permit No. 07362T10. Application No. 5500089.05A was received by the DAQ on February 2, 2005. The application was deemed complete on April 11, 2005, when a request for information was returned from the Company's consultant (Updated facility emissions, CAM applicability).

II. Proposed changes in Application 5500089.05A:

1. The addition of insignificant activity Bag Machine 2, ID No. I-ES-24.
2. Change in specific stipulation 2.1.A.b. as noted below.
3. Addition of 112(r) specific stipulation as noted below.

III. Changes to existing Title V Air Permit No. 07362T09:

Page	Section	Comments
all	throughout	Updated permit No., letter language, and formats.
Insig	Insig list	Changed name of I-ES-23, added I-ES-24.
8	2.3	Added 2.3 for 112(r).
8-16	3	Updated General Conditions.

IV. Facility Description:

This facility manufactures packaging foam and related packaging foam products.

V. Statement of Compliance:

This facility was inspected by Mr. Jim Hafner of MRO on July 14, 2004. The facility was in full operation at the time of the inspection, and was determined to be in compliance with applicable Air Quality regulations.

VI. Permitted Emissions Sources and Associated Air Pollution Control Devices and Appurtenances:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
C ES-4 and ES-9 (partial) C ES-6 and ES-7	PSD Avoidance Group One including: C Polyethylene Extruder (Line 4) and Foam Storage (Partial) C Polystyrene Expanders	C n/a C n/a	C n/a C n/a
C ES-5 and ES-9 (partial)	PSD Avoidance Group Two including: C Polyethylene Extruder (Line 5) and Foam Storage (Partial)	▪ n/a	C n/a
C ES-21	PSD Avoidance Group Three: C Polyethylene Reprocessor	C n/a	C n/a
C ES-22	NSR/NAA Avoidance Group One: C Polyethylene Extruder	C n/a	C n/a

VII. Emission Source-By-Source Evaluation:

A. Polyethylene Extruder (Line 4) and Foam Storage (Partial) (ID Nos. ES-4 and ES-9), Polystyrene Expanders (ID Nos. ES-6 and ES-7).

1. Description: Polyethylene extrusion lines that take polyethylene pellets, add heat and propane/butane and extrude an expanded packing foam product.
2. Applicable Regulatory Requirements:
 - 15A NCAC 2D .0186
 - 15A NCAC 2Q .0317

No regulatory review is required at this time since there are no new applicable regulations for these sources under this permit renewal.

However, specific condition 2.1.A.1.b needed to be changed to reflect the manner in which VOC emissions are calculated. Previous permits indicated that emissions from ES-4, ES-9, ES-6, and ES-7 were to be calculated based on the blowing agent throughput. This is correct for ES-4 and ES-9 only. VOC emissions from ES-6 and ES-7 are calculated using emission factors. This is consistent with Section 2.1.C. This change does not effect compliance with the PSD avoidance condition, and will allow more accurate tracking of VOC emissions in the future.

Changes to the condition are as follows:

Monitoring/Recordkeeping [15A NCAC 2Q .0508 (f)]

- b. Calculations of VOC emissions shall be made at the end of each month. VOC emissions shall be determined by measuring and recording the actual quantity of the blowing agent used and assuming that 100 percent is emitted to the atmosphere (*ES-4 and ES-9 only*). The total amount of VOC emissions shall be recorded in a monthly emissions log. VOC emissions shall be determined by multiplying the production weights by the appropriate emission factor (ES-6 and ES-7 only). These production weights, calculations, and the total amount of VOC emissions shall be recorded in a monthly emissions log. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530 if the amounts of VOC containing materials are not monitored and recorded or if the VOC emissions exceed the limit in 2.1(A)(1)(a).

B. Polyethylene Extruder (Line 5) and Foam Storage (Partial) (ID Nos. ES-5 and ES-9).

1. Description: Polyethylene extrusion lines that take polyethylene pellets, add heat and propane/butane and extrude an expanded packing foam product.
2. Applicable Regulatory Requirements:
 - 15A NCAC 2D .0186
 - 15A NCAC 2Q .0317

No regulatory review is required at this time since there are no new applicable regulations for these sources under this permit renewal.

C. Polyethylene Reprocessor (ID No. ES-21).

1. Description: Polyethylene foam is shredded and recycled back into the extrusion lines.
2. Applicable Regulatory Requirements:
 - 15A NCAC 2D .0186
 - 15A NCAC 2Q .0317

No regulatory review is required at this time since there are no new applicable regulations for these sources under this permit renewal.

D. Polyethylene Extruder (ID No. ES-22).

1. Description: Polyethylene extrusion lines that take polyethylene pellets, add heat and propane/butane and extrude an expanded packing foam product.
2. Applicable Regulatory Requirements:
 - 15A NCAC 2D .0186
 - 15A NCAC 2Q .0317

No regulatory review is required at this time since there are no new applicable regulations for these sources under this permit renewal.

VIII. Compliance Assurance Monitoring (CAM):

This facility is not subject to Compliance Assurance Monitoring because there are no control devices.

IX. NSPS Issues:

This facility is not subject to any NSPS requirement.

X. PSD/NAA Issues:

The facility currently has three PSD avoidance conditions to limit the amount of VOC emissions. There are two separate 250 TPY limits and a 40 TPY limit. There is one NAA/NSR limit of 40 TPY.

XI. MACT Issues:

This facility is not subject to any MACT regulation.

XII. 112(r) Issues:

The facility is subject to 112(r), accidental releases, because both a propane storage tank (ID No. I-T-2) and a butane storage tank (ID No. I-T-1) are over 10,000 pounds). A specific condition indicating the facility is subject to 112(r) was included in the permit.

XIII. Facility-Wide Air Toxics:

This facility does not emit NC Air Toxics.

XIV. Facility Emissions Summary (2004):

Emission Source	VOC Emissions (TPY)
PSD Group 1	138.6
PSD Group 2	83.5
PSD Group 3	14.4
NAA Group 1	0

XV. Miscellaneous:

1. A consistency determination was not required for this renewal application.
1. A Professional Engineer seal was not required for this application.
2. An application-processing fee was not required for this application.
4. A 30-day public notice is required for this application. This application will also be submitted for a 45-day EPA review concurrent to the public notice period. South Carolina and Mecklenburg County are effected states.
<INSERT RESULTS OF COMMENTS HERE>
5. The previously exempted source "Bubble out bag machine", ID No. I-ES-23, was changed to "Bag Machine 1". "Bag machine 2", ID No. I-ES-24, was added to the permit.

XVI. Conclusions, Comments, and Recommendations.

This Air Permit issued as a renewal permit for CPI Packaging Inc., located in Lincolnton, North Carolina has been reviewed by the DAQ to determine compliance with all procedures and requirements. The DAQ has determined that this facility is complying with all applicable requirements.

Issue Air Quality Permit No. 07362T10 to CPI Packaging Inc.