

Air Permit Review

Permit Issue Date: **date, 2010**

Region: Winston-Salem Regional Office
County: Davidson
NC Facility ID: 2900116
Inspector's Name: Stephen Moser
Date of Last Inspection: 10/29/2009
Compliance Code: 3 / Compliance - inspection

Facility Data			Permit Applicability (this application only)
<p>Applicant (Facility's Name): Exopack - Thomasville, LLC</p> <p>Facility Address: Exopack - Thomasville, LLC 1308 Blair Street Thomasville, NC 27360</p> <p>SIC: 2673 / Bags: Plastics, Laminated And Coated NAICS: 326111 / Plastics Bag Manufacturing</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>			<p>SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:</p>
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	<p>Application Number: 2900116.10A Date Received: 05/04/2010 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 04444/T14 Existing Permit Issue Date: 04/04/2008 Existing Permit Expiration Date: 02/28/2011</p>
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Review Engineer: Mark Cuilla		Comments / Recommendations:	
Review Engineer's Signature:		Issue 04444/T15	
Date: date, 2010		Permit Issue Date: date, 2010	
		Permit Expiration Date: date, 2015	

I. Purpose of Application

This permitting action is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (**04444T14**) was issued on **April 4, 2008**, and is currently scheduled to expire on **February 28, 2011**. The renewal application was received on **May 4, 2010**, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

II. Facility Description

The facility produces plastic sheet film for the plastic bag industry, including the printing of images and data onto the film stock.

III. History/Background/Application Chronology

March 7, 2006 – Permit **04444T13** issued as a permit renewal.

April 4, 2008 – Permit **04444T14** issued as a minor modification for the removal of one flexographic printing press (ID No. P1) and the addition of one flexographic printing press (ID No. 138).

October 29, 2009 – Stephen Moser of the WSRO completed the annual facility inspection.

May 4, 2010 – Permit application **2900116.10A** received and deemed complete for processing.

June 23, 2010 – DRAFT permit sent to Permittee and Regional Office for comment prior to public notice and EPA review.

date, 2010 – DRAFT permit sent to 30-day public notice and 45-day EPA review.

IV. Permit Modifications/Changes and ESM Discussion

The following table describes the modifications to the current permit as part of the renewal process.

Pages	Section	Description of Changes
Attachment	Insignificant activities	-amended permit revision number
Cover	-	-amended all dates and permit revision numbers -amended mailing address
TOC	-	-removed all references to Part II (including asterisked language)
All	Header	-amended permit revision number
3	Equipment table	-added MACT designations where needed
4	2.1 A.1 (table)	-clarified equipment associated with 250 ton per year PSD avoidance limit
5	2.1 A.1.b 2.1 A.1.c 2.1 A.2.b	-corrected testing rule cross reference -updated shell language -corrected testing rule cross reference
6	2.1 A.3.b 2.1 A.3.c	-corrected testing rule cross reference -updated shell language
8	2.1 A.7.c	-updated shell reporting language
9	2.1 A.8	-renumbered Section (formerly Section 2.2 A.1)
9-10	2.1 A.9	-renumbered Section (formerly Section 2.2 B.1)
10	2.1 A.10 2.1 A.10.a 2.1 A.10.b 2.1 A.10.c	-renamed and renumbered Section (formerly Section 2.2 C.1) -updated shell language -corrected cross reference and updated shell language -updated shell language
10-11	2.1 A.11	-renumbered Section (formerly Section 2.2 D.1) -updated shell language and added TPER table
11-21	General conditions	-updated shell conditions (v3.1)
Attachment	List of Acronyms	-added acronyms for CAIR, NAA, and RACT per current shell language

Other than adding MACT designations where needed, there were no additional ESM modifications necessary as part of this permit renewal.

V. Regulatory Review

The facility is currently subject to the following regulations:

15A NCAC 2D .0515, Particulates from Miscellaneous Industrial Processes
15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources
15A NCAC 2D .0521, Control of Visible Emissions
15A NCAC 2D .0958, Work Practices for Sources of Volatile Organic Compounds
15A NCAC 2D .1100, Control of Toxic Air Pollutants
15A NCAC 2D .1111, Maximum Achievable Control Technology (40 CFR 63, Subpart KK)
15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions
15A NCAC 2Q .0317, Avoidance Conditions (15A NCAC 2D .0530, Prevention of Significant Deterioration)
15A NCAC 2Q .0711, Emission Rates Requiring a Permit

A regulatory review for these current permit conditions will not be included in this document.

VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS – The Permittee is not currently subject to any New Source Performance Standards. This permit renewal does not affect this status.

NESHAPS/MACT – The Permittee is subject to the National Emission Standards for the Printing and Publishing Industry (40 CFR 63, Subpart KK) and has elected to be defined as an area source as allowed by 63.820(a)(2). The Subpart reads:

63.820(a)(2) - The provisions of this Subpart apply to each new and existing facility at which ...wide-web flexographic printing presses are operated for which the owner or operator chooses to commit to, and meets the criteria of paragraphs (a)(2)(i) and (a)(2)(ii) of this section for the purposes of establishing the facility to be an area source with respect to this Subpart:

- (i) use less than 10 tons per each rolling 12-month period of each HAP at the facility, including materials **used** for source categories or purposes other than printing and publishing, and
- (ii) use less than 25 tons per each rolling 12-month period of any combination of HAP at the facility, including materials **used** for source categories or purposes other than printing and publishing.

63.820(a)(3) - Each facility for which the owner or operator chooses to commit to and meets the criteria stated in paragraph (a)(2) of this Section shall be considered an area source, and is subject to only the provisions of 63.829(d) and 63.830(b)(1) of this Section.

63.829(d) - The owner or operator of each facility which commits to the criteria of 40 CFR 63.820(a)(2) shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria, including the mass of all HAP containing materials **used** and the mass fraction of HAP present in each HAP containing material **used**, on a monthly basis.

63.830(b)(1) - Each owner or operator of an affected source subject to this Subpart shall submit an initial notification required in 60 CFR 63.9(b) to the Administrator.

These requirements are contained in the current permit. This permit renewal does not affect this status. However, the current permit designates these requirements as part of a “MACT Avoidance” via 15A NCAC 2Q .0317, Avoidance Conditions. This is incorrect, the requirements are actually part of the MACT Subpart. The sources are actually MACT applicable and complying with the MACT using the allowable procedures of the MACT. Therefore, the renewed permit will be modified to include MACT designations for the equipment as necessary.

PSD – The facility is subject to the following PSD avoidance conditions for volatile organic compounds:

1. Less than 250 tons combined per consecutive 12-month period for sources (**ID Nos. E1, E2, and E4 through E8, P2, P3, and F160**),
2. Less than 68.5 tons per consecutive 12-month period for sources (**ID Nos. PS1 through PS8**), and
3. Less than 40 tons per consecutive 12-month period for sources (**ID Nos. E9 through E12, and F163**).

For each of these three separate limits, the Permittee is required to calculate VOC emissions per month at the end of each month. VOC emissions shall be determined by multiplying the total amount of each type of VOC-containing material consumed during the month by the VOC content of the material. In addition, semi-annual reporting is also required. This permit renewal does not affect the status of these existing conditions. However, the following table gives a historical look at the PSD permitting for the facility.

Permit Revision No.	PSD Limit (Source ID Numbers)			
	Condition 1	Condition 2	Condition 3	Condition 4
R00	-	-	-	-
R01	<250 tpy (E1, E2, E4-E7, P1-P4, and F160)	-	-	-
R02	<250 tpy (E1, E2, E4-E8, P1-P3, and F160)	<250 tpy (E3, P4, and F161) Note. P4 was replaced in this modification. Therefore, the move from condition 1 to condition 2.	-	-
R03	<250 tpy (E1, E2, E4-E8, P1-P3, and F160)	<250 tpy (E3, P4, and F161)	-	-
R04	<250 tpy (E1, E2, E4-E8, P1-P3, and F160)	<250 tpy (E3, P4, and F161)	<40 tpy (E9-E12 and F163)	<40 tpy (136 and 170)
R05	Left off by mistake	<250 tpy (E3, P4, and F161)	<40 tpy (E9-E12 and F163)	<40 tpy (136 and 170)
R06	<250 tpy (E1, E2, E4-E8, P1-P3, and F160)	<250 tpy (E3, P4, and F161)	<40 tpy (E9-E12 and F163)	Condition removed. Potential of sources <40 tpy.
R07	<250 tpy (E1, E2, E4-E8, P1-P3, and F160)	<250 tpy (E3, P4, and F161)	<40 tpy (E9-E12 and F163)	-
R08	<250 tpy (E1, E2, E4-E8, P1-P3, and F160)	<250 tpy (E3, P4, and F161)	<40 tpy (E9-E12 and F163)	-

Permit Revision No.	PSD Limit (Source ID Numbers)			
	Condition 1	Condition 2	Condition 3	Condition 4
R09	<250 tpy (E1, E2, E4-E8, P1-P3, and F160)	Condition removed. With the removal of P4, remaining sources potential <250 tpy.	<40 tpy (E9-E12 and F163)	<40 tpy (PS1-PS8)
R10	<250 tpy (E1, E2, E4-E8, P1-P3, and F160)	-	<40 tpy (E9-E12 and F163)	<68.5 tpy (PS1-PS8). Limit modified with removal of P4 – documented credible decrease in emissions of 28.5 tons. Should have been as part of R09.
T11	<250 tpy (E1, E2, E4-E8, P1-P3, and F160)	-	<40 tpy (E9-E12 and F163)	<68.5 tpy (PS1-PS8)
T12	<250 tpy (E1, E2, E4-E8, P1-P3, and F160)	-	<40 tpy (E9-E12 and F163)	<68.5 tpy (PS1-PS8)
T13	<250 tpy (E1, E2, E4-E8, P1-P3, and F160)	-	<40 tpy (E9-E12 and F163)	<68.5 tpy (PS1-PS8)
T14	<250 tpy (E1, E2, E4-E8, P2-P3, and F160)	-	<40 tpy (E9-E12 and F163)	<68.5 tpy (PS1-PS8)

* For the purposes of this table, the current equipment ID numbers are being used. There have been multiple changes throughout the revisions of equipment ID number changes.

112(r) – The facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the thresholds in the Rule. This permit renewal does not affect this status.

CAM – 40 CFR 64 requires that a continuous compliance assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. There are no control devices installed at the facility; therefore, the facility does not meet the CAM applicability criteria. This permit renewal does not affect this status.

VII. Facility Wide Air Toxics

The Permittee is subject emission limits for ammonia and ethyl acetate 15A NCAC 2D .1100. To ensure compliance with these limits, the Permittee is required to comply with the following operating restrictions:

- no more than 70.0 pounds per hour of ethyl acetate may be used at the facility on a daily basis, and
- no more than 5.70 pounds per hour of ammonia may be used at the facility on a daily basis.

The Permittee is also required to submit quarterly reporting of all monitoring and recordkeeping activities. This permit renewal does not affect this status.

In addition to the modeled emission rates above, the Permittee has made a demonstration that the corresponding toxic permit emission rates (TPERs) in 15A NCAC 2Q .0711 for acetaldehyde, formaldehyde, toluene, and xylene are not being exceeded. Prior to any exceedance of these TPERs, the Permittee is responsible for obtaining a permit to emit the toxic air pollutant and for

demonstrating compliance with 15A NCAC 2D .1100 for that pollutant. This permit renewal does not affect this status.

VIII. Facility Emissions Review

There is no change in emissions for this renewal.

The following table represents the latest years' emission inventories from the facility:

Pollutant(s)	2008 Actual Emissions (tpy)	2009 Actual Emissions (tpy)
CO	0.14	0.26
NO _x	0.17	0.30
PM ₁₀	0.01	0.03
SO ₂	-	0.00
VOC	99.29	26.86
Total HAPs/TAPs	84.20	20.10

IX. Stipulation Review

The facility was last inspected by Stephen Moser of the WSRO on **October 29, 2009**. Based on his inspection and data review, the facility appeared to be in compliance.

X. Public Notice/EPA and Affected State(s) Review

Pursuant to 15A NCAC 2Q .0521, a notice of the DRAFT Title V Permit shall be placed in a newspaper of general circulation in the area where the facility is located. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also pursuant to 2Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. The State of Virginia and the Forsyth County Local Program are affected States/areas within 50 miles of this facility.

XI. Conclusions, Comments, and Recommendations

A professional engineer's seal was not required for this renewal.

A consistency determination was not required for this renewal.

WSRO recommends issuance of the permit and was sent a DRAFT permit prior to issuance (See Section III of this document for a discussion).

RCO concurs with WSRO's recommendation to issue the renewed air permit.