

## Air Permit Review

Permit Issue Date: **date, 2011**

**Region:** Asheville Regional Office  
**County:** Rutherford  
**NC Facility ID:** 8100190  
**Inspector's Name:** Patrick Ballard  
**Date of Last Inspection:** 12/20/2010  
**Compliance Code:** 3 / Compliance - inspection

<b>Facility Data</b>			<b>Permit Applicability (this application only)</b>
<p><b>Applicant (Facility's Name):</b> Plastic Packaging, Inc. - Plant No. 2</p> <p><b>Facility Address:</b>                  Plastic Packaging, Inc. - Plant No. 2                  681 Piney Ridge Road                  Forest City, NC 28043</p> <p><b>SIC:</b> 2759 / Commercial Printing, Nec  <b>NAICS:</b> 323112 / Commercial Flexographic Printing</p> <p><b>Facility Classification: Before:</b> Title V    <b>After:</b> Title V  <b>Fee Classification: Before:</b> Title V    <b>After:</b> Title V</p>			<p><b>SIP:</b>  <b>NSPS:</b>  <b>NESHAP:</b>  <b>PSD:</b>  <b>PSD Avoidance:</b>  <b>NC Toxics:</b>  <b>112(r):</b>  <b>Other:</b></p>
<b>Contact Data</b>			<b>Application Data</b>
<b>Facility Contact</b>	<b>Authorized Contact</b>	<b>Technical Contact</b>	<p><b>Application Number:</b> 8100190.11A and 8100190.11B  <b>Date Received:</b> 05/26/2011 and 07/21/2011  <b>Application Type:</b> Renewal  <b>Application Schedule:</b> TV-Renewal  <b>Existing Permit Data</b>  <b>Existing Permit Number:</b> 08091/T13  <b>Existing Permit Issue Date:</b> 04/12/2011  <b>Existing Permit Expiration Date:</b> 02/29/2012</p>
Edward Sievers Plant Manager (828) 286-1356 P. O. Box 130 Forest City, NC 28043	Edward Sievers Plant Manager (828) 286-1356 P. O. Box 130 Forest City, NC 28043	Edward Sievers Plant Manager (828) 286-1356 P. O. Box 130 Forest City, NC 28043	
<p><b>Review Engineer:</b> Mark Cuilla</p> <p><b>Review Engineer's Signature:</b>  <b>Date:</b> <b>date, 2011</b></p>		<p style="text-align: center;"><b>Comments / Recommendations:</b></p> <p><b>Issue</b> 08091/T14  <b>Permit Issue Date:</b> <b>date, 2011</b>  <b>Permit Expiration Date:</b> <b>date, 2016</b></p>	

### I. Purpose of Application

This permitting action is:

1. renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (**08091T13**) was issued on **April 12, 2011**, with an expiration date of **February 29, 2012**. The renewal application was received on **May 26, 2011**, 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; and
2. consolidation of a second part application for 501(c)(2) significant modification. The first step permit was issued for the addition of press nine (**ID No. ES-P9**) and removal of press eight (**ID No. ES-P8**). This modification required the submittal of the second step application within 12 months of startup of press nine. This application completes that requirement. No permit changes are required as part of this permit modification (other than removal of corresponding 501(c)(2) asterisked language). Details of the part I application can be found in Joe Voelker's **December 15, 2010** permit review for permit **08091T12**.

## II. Facility Description

The facility is a plastic converter that prints customer designs, patterns and/or writing onto plastic (polyethylene/polypropylene) film and then converts the material into plastic packaging.

## III. History/Background/Application Chronology

**March 27, 2007** – Permit **08091T08** issued as a Title V renewal.

**April 9, 2007** – Permit **08091T09** issued as a 501(c)(2) part I modification for the addition of press 7 (**ID No. ES-P7**) and a solvent recovery unit.

**November 2, 2007** – Permit **08091T10** issued as a 501(c)(2) part I modification for the addition of press 8 (**ID No. ES-P8**) and the removal of presses 3 and 5 (**ID Nos. ES-P3 and ES-P5**).

**December 8, 2008** – Permit **08091T11** issued as a 501(c)(2) part II modification to complete the second step significant modifications per permits **08091T09** and **08091T10**.

**December 15, 2010** – Permit **08091T12** issued as a 501(c)(2) part I modification for the addition of press 9 (**ID No. ES-P9**) and the removal of press 8 (**ID No. ES-P8**).

**April 12, 2011** – Permit **08091T13** issued as a one-step significant modification to add facility-wide volatile organic compound PAM limits.

**May 26, 2011** – Permit application **8100190.11A** received as a Title V renewal application. Application was deemed complete for processing.

**July 21, 2011** – Permit application **8100190.11B** received as a 501(c)(2) part II modification to complete the second step significant modification per permit **08091T12**. Application was consolidated into Title V renewal application for processing.

**July 26, 2011** – DRAFT permit sent to Permittee and ARO for comment prior to public notice and EPA review. The Permittee commented via email on **July 26, 2011**. Mr. Ed Sievers pointed out that the wash-off tank (**ID No. IWOT2**) had been removed from the facility and should be removed from the permit as part of this permit renewal. This change has been made.

**date, 2011** – 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	-removed wash-off tank ( <b>ID No. IWOT2</b> ) per Permittee request
Cover	-	-amended permit revision number and all dates
All	Header	-amended permit revision number
3	Equipment table	-added “direct-fired” descriptor to combustion source descriptions -removed asterisk language associated with the addition of press 9 ( <b>ID No. ES-P9</b> )

Pages	Section	Description of Changes
4	2.1 A 2.1 A.1.a	-added “direct-fired” descriptor to combustion source descriptions -added ID numbers
5	2.1 A.1.d 2.1 A.2.a 2.1 A.2.c 2.1 A.3.a 2.1 A.3.c	-added ID numbers -added ID numbers -added ID numbers -added ID numbers -added ID numbers
8	2.3 A.1.b	-corrected VOC PAL limit (typo from 401 to 511 tons per year)
9	2.3 A.1.c	-corrected cross reference
10-12	2.3 A.1.m-aa	-corrected paragraph numbering
12-22	General Conditions	-updated shell conditions (v3.4)

There were only minor, non-significant modifications to the equipment descriptions needed in TVEE.

## 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 .0530, Prevention of Significant Deterioration  
15A NCAC 2D .0958, Work Practices for Sources of Volatile Organic Compounds  
15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions  
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 facility is classified as a Title III minor facility (natural small source of hazardous air pollutants). Because of this classification, applicability to the National Emission Standards for Hazardous Air Pollutants for the Printing and Publishing Industry (40 CFR 63, Subpart KK) is not required. No current area source GACTs have been promulgated for this source category. This permit renewal does not affect this status.

**PSD** – The facility is currently classified as a major stationary source for the purposes of the Prevention of Significant Deterioration program. The current permit includes a facility-wide volatile organic compound plant-wide applicability limitation (PAL) as allowed under 15A NCAC 2D .0530 and 40 CFR 51.666. The PAL limit of 511 tons per year was established per a Title V significant modification (See Joe Voelker’s permit review **08091T13, April 12, 2011**). This permit renewal does not affect this status. Minor typographical errors were corrected in this permit condition as detailed in the table of changes above.

**112(r)** – The facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store one or more 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. The Permittee does not currently employ any control devices to achieve compliance with any required permit conditions; therefore, CAM does not apply. This permit renewal does not affect this status.

## **VII. Facility Wide Air Toxics**

The Permittee is currently subject to requirements per 15A NCAC 2Q .0711, Emission Rates Requiring a Permit. This permit condition acknowledges that the Permittee has made a demonstration that facility-wide actual emissions of the respective toxic air pollutant (TAP) is below its corresponding toxic pollutant emission rate (TPER). The Permittee is required to submit a permit application demonstrating compliance with the ambient air level per 15A NCAC 2D .1100 prior to exceeding any TPER. 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:

<b>Pollutant(s)</b>	<b>2009 Actual Emissions (tpy)</b>	<b>2010 Actual Emissions (tpy)</b>
CO	0.16	0.2
NO <sub>x</sub>	0.2	0.24
PM <sub>10</sub>	0.01	0.01
VOC	172.31	180.01
Total HAPs/TAPs	0.46	0.24

## **IX. Stipulation Review**

The facility was last inspected by Patrick Ballard of the ARO on **December 20, 2010**. Based on his observations the facility appeared to be operating in compliance with their Title V permit requirements.

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

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 2Q .0521. 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 South Carolina is an affected State 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.

ARO 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 ARO's recommendation to issue the renewed air permit.