

SIP CONSTRUCTION PERMIT AND TITLE V MINOR MODIFICATION APPLICATION REVIEW

Facility Name: **Printpack, Inc.**

City: Villa Rica

County: Carroll

AIRS #: 04-13-045-00039

Application #: TV-11690

Date SIP Application Received: September 13, 1999

Date Title V Application Received: September 13, 1999

Permit No: 2759-045-0039-V-01-2

Program	Review Engineers	Review Managers
SSPP	Matthew Page	Terry Johnson
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TOXICS	n/a	n/a

Introduction

This narrative is being provided to assist the reader in understanding the content of the attached SIP permit to construct and draft/proposed operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Existing Permits

Table 1 below lists the current Title V permit, and all administrative amendments and minor and significant modifications to that permit. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
2759-045-0039-V-01-0	December 3, 1998		x
2759-045-0039-V-01-1	May 13, 1999		x

B. Regulatory Status

1. PSD/NSR

The facility is a major PSD source for VOC because the major equipment (all presses and laminator lines) at the facility is limited to a combined 899.7 tpy VOC and it is located in an ozone attainment area (Carroll County). The facility is a minor source for all other criteria pollutants.

The facility is located in the contributing area to the non-attainment area and is required to submit a RACT plan to the Division by October 1, 2000 since the facility can emit more than 100 tpy VOC and is located in the contributing area to the Atlanta area ozone non-attainment area (Carroll County).

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility=s Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	Yes			T
PM ₁₀	Yes			T
SO ₂	Yes			T
VOC	Yes	T		
NO _x	Yes			T
CO	Yes			T
TRS	Yes			T
H ₂ S	Yes			T

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
Individual	Yes			T
Total HAPs	Yes			T

The facility has a HAP limitation of 10/25 tpy in order to avoid applicability under NESHAP Subpart KK - Printing and Publishing MACT Standard.

II. Proposed Modification

A. Description of Modification

The facility will construct a total enclosure around the post coat station of Laminator L035 (Emission Unit ID No. L035). The emissions from the post coat station will be vented to the existing regenerative thermal oxidizer system (Air Pollution Control Device ID Nos. RTO1 and RTO2). The construction of the total enclosure is a minor modification because the potential VOC/HAP emissions from the facility will not increase, no emission limit is changing, no new emission limits are being added as a result of the modification, are not modifications under any NSPS, NESHAP, and PSD, and there will be no major change to any monitoring methodology in the existing permit. The facility requested that the SIC code be altered from 2759 to 2671 in order to better reflect the facility's operation (see Application No. 11984, dated January 12, 2000). The change of the SIC Code is an administrative change but will be handled when the permit is reissued by December 2003.

B. Emissions Change

Table 3: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)	Increase Less Than Minor Mod Threshold (y/n)
PM	No	n/a	n/a	n
PM ₁₀	No	n/a	n/a	n
SO ₂	No	n/a	n/a	n
VOC	Yes	(5)	0.0	n
NO _x	No	n/a	n/a	n
CO	No	n/a	n/a	n
TRS	n/a	n/a	n/a	n
H ₂ S	n/a	n/a	n/a	n

Table 3: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)	Increase Less Than Minor Mod Threshold (y/n)
Individual	Yes	(1)	0.0	n
Total HAPs	Yes	(1)	0.0	n

The facility is not adding any emission units and is only routing the laminator L035 to the thermal oxidizer system in order to handle an increase in production and maintain the 325 tpy VOC emission limitation specified in Condition No. 3.3.2. Laminator L035 as well Laminator L033, Parts Washer PW02, and Presses P004, P005, P006, P007, P008, and P009 are limited to VOC emissions of no more than 325 tpy. The facility will be utilizing the Laminator L035 for the permitted purpose and the only modification to the device is the total enclosure around the post coat station. Only the post coater station will be controlled because this is the station at which the thermal strip is applied. The primer station will remain uncontrolled for Laminator L035. Laminators L033 and L035 are limited to 39 tpy VOC, combined. The modification will not result in an increase in potential emissions since the VOC emissions limitations will not change (325 tpy and 39 tpy) and the emission unit is not being modified in any way to increase production or debottle neck any process. Any increases in actual emissions will be as a result of increased production. However, even if the facility increased production, the VOC/HAP emissions from the laminator L035 would be lower since the facility is controlling emissions from it by at least 95 percent. The facility would have to increase production 20 fold to see any increase in actual emissions.

C. PSD/NSR Applicability

The facility is not performing a physical change to Laminator L035 that will increase the capacity of the emission unit or debottle neck any downstream process line. The facility is also not requesting any increases in any emission limitations. Therefore, the modification (enclosure of the post coat station) will not trigger review under PSD. NSR is not applicable because the facility is located in an attainment area for ground level ozone (Carroll County). The is not making a physical modification to the laminator to increase emissions, therefore, the facility does not have to be concerned with the application triggering the additional provisions for the areas contributing to the ozone non-attainment area. The laminator L035 cannot possibly emit more than 39 tpy if the facility adheres to the permit. Therefore, the modification can only be considered minor.

All applicable regulations are federally enforceable by the Georgia Environmental Protection Division and the United States Environmental Protection Agency.

III. Facility Wide Requirements

A. Emission and Operating Caps

No new facility wide emission or operating limits are being added as a result of this application (No. TV-11690). No facility wide emission or operating limits are being modified.

B. Applicable Rules and Regulations

The facility will not be subject to any new facility wide rules or standards as a result of the modification.

C. Compliance Status

No compliance problems exist with this facility that would hinder the issuance of this permit amendment.

D. Operational Flexibility

The facility did not specify any operational flexibility in their application.

E. Permit Conditions

None applicable.

IV. Regulated Equipment Requirements

A. Brief Process Description

The facility is adding a total enclosure for the post coat station for Laminator L035 in order to control the VOC/HAP emissions from this emission unit. No other changes to the facility's operations will occur.

B. Equipment List for the Process

Table 4: Modified Equipment

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements / Standards	Corresponding Permit Conditions	ID No.	Description
L035	Laminator	391-3-1-.02(2)(w) 40 CFR 52.21	3.3.2, 3.3.3, 3.3.4, 3.3.7, 3.3.8, 4.2.1, 6.2.1, 6.2.2, 6.2.3, and 6.2.4	RTO1 and RTO2	Regenerative Thermal Oxidizer

* Generally Applicable Requirements contained in this permit may apply also to emission units listed above.

C. Equipment & Rule Applicability

! Emission and Operating Caps:

The laminators L031 and L035 are limited to 39 tpy VOC, combined, by Condition No. 3.3.3. This VOC limitation was put on the two laminators to avoid PSD review since the major modification threshold for VOC is 40 tpy per modification. This emission limitation will be maintained.

! Applicable Rules and Regulations -

Rules and Regulations Assessment:

The laminator is subject to the following rules:

391-3-1-.02(2)(w) AVOC Emissions form Paper Coating@

The laminator L035 (Emission Unit ID No. L035) is subject to Georgia Rule 391-3-1-.02(2)(w) because the emission unit is engaged in paper coating operations (the uniform application of a coating upon a substrate) that emit more than 100 tpy, combined, VOC (100 tpy operation exemption in the ozone attainment area).

Emission and Operating Standards:

391-3-1-.02(2)(w) VOC Emissions from Paper Coating: The facility must limit the VOC emissions from the coating operations (Emission Unit ID Nos. L031, L033, and L035) to no more than 2.9 pounds per gallon of coating, excluding water, delivered to the coating applicator. The facility can comply with the above limit by ensuring that each and every coating used on the laminator lines (Emission Unit ID Nos. L031, L033, and L035) meets the limit of 2.9 pounds VOC per gallon of coating. The facility can also comply with Rule (w) by ensuring that the daily weighted average of all coating applied on a single line (no cross line averaging allowed) meets the solids equivalent limit of 4.79 pounds VOC per gallon of coating solids delivered to the coating applicator. The facility will ensure that each and every coating meets the specified VOC limit or ensure that the daily weighted average solids equivalent limit is being meet. The facility is in compliance with the specified VOC limit.

D. Compliance Status

There are no compliance issues with the laminator L035.

E. Operational Flexibility

The source has not requested any operational flexibility.

F. Permit Conditions

1. Condition No. 3.3.8 will be modified to include L035. This condition requires that the VOC capture and control system for L035 is maintained such that the overall control efficiency equal or exceeds 95 percent. This condition will ensure that the laminator will maintain compliance with VOC limitation specified in Condition No. 3.3.3 (39 tpy VOC) and maintain compliance with Rule (w).

V. Testing Requirements (with Associated Record Keeping and Reporting)

A. Individual Equipment:

Condition No. 4.2.1 will be modified to include the performance testing for Laminator L035. Condition No. 4.2.1(b) will require the facility to verify that the Laminator L035 enclosure for the post coat station meets the Division approved criteria for a permanent total enclosure. Condition No. 4.2.1(b) will require that the facility

undergo performance testing for the RTO control system if the inlet flowrate to the control system varies significantly from the last performance test due to the addition of the L035 emissions to the control system. This condition will ensure that the facility can meet the overall VOC control efficiency specified in Condition No. 3.3.8.

B. Equipment Groups

None Applicable

VI. Monitoring Requirements (with Associated Record Keeping and Reporting)

A. Individual Equipment:

No monitoring conditions need to be modified or added as a result of this modification.

B. Equipment Groups:

No monitoring conditions need to be modified or added as a result of this modification.

VI. Other Record Keeping and Reporting Requirements

No recordkeeping and reporting conditions need to be modified or added as a result of the addition of the total enclosure around the post coat station of Laminator L035.

VII. Specific Requirements

A. Operational Flexibility

Not applicable

B. Alternative Requirements

None applicable

C. Insignificant Activities

The insignificant listing will not change as a result of this modification.

D. Temporary Sources

None applicable.

E. Short-Term Activities

None

F. Compliance Schedule/Progress Reports

None applicable

G. Emissions Trading

Not applicable

H. Acid Rain Requirements

This modification does not change the Acid Rain requirements for the facility.

I. Prevention of Accidental Releases

This modification does not changes the source's applicability.

J. Stratospheric Ozone Protection Requirements

This modification does not changes the source's applicability to Title VI.

K. Pollution Prevention

Not applicable

L. Specific Conditions

None

SIP CONSTRUCTION PERMIT AND TITLE V MINOR MODIFICATION APPLICATION REVIEW

Closing Block: We have reviewed and recommend issuance of draft/proposed Permit No. 2759-045-0039-V-01-2

Program	Review Engineers	Dates	Review Managers	Dates
SSPP				
SSCP				
ISMP				
TOXICS				

Stationary Source Permitting Program Manager

Date